

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS: 44, 58-65, 67-71, 73, 75
76, 78, 82-85, 94, 107, 108, 113, 114, 131, 136, 139-151, and 154
INTERIOR AND EASTERN ARCTIC REGION PROPOSALS
ALASKA BOARD OF GAME MEETING
FAIRBANKS, ALASKA
MARCH 6-14, 2020



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 6-14, 2020 in Fairbanks, 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 44 – 5 AAC 99.025(a)(12). Customary and traditional uses of migratory bird and waterfowl population(s). Address customary and traditional use findings for migratory birds and waterfowl in Units 12, 19, 20, 21, 24, and 25 & develop regulations to provide reasonable opportunity for subsistence uses.

PROPOSED BY: Darrell Vent, Sr.

WHAT WOULD THE PROPOSAL DO? Determine if there are customary and traditional (C&T) subsistence uses of migratory birds and waterfowl in Units 12, 19, 20, 21, 24, and 25.

WHAT ARE THE CURRENT REGULATIONS? There are various state and federal regulations governing the hunting of migratory game birds, which include ducks, geese, swans (which together constitute “waterfowl”), cranes, and snipe. The department prepared an in-depth customary and traditional use worksheet (Special Publication No. BOG 2017-10), which is posted on the Board of Game’s website for the November 2017 Statewide meeting. Detailed state and federal regulations can be found in the report. At its 2017 statewide meeting, the Board found that migratory game birds are customarily and traditionally used for subsistence in all units except within the nonsubsistence areas defined in 5 AAC 99.015. The Board did not establish an amount reasonably necessary for subsistence (ANS).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? No effect, as the Board has determined there are customary and traditional uses of migratory game birds throughout their ranges in Alaska.

BACKGROUND: AS 16.05.258 requires the board to identify game populations or portions of populations that support customary and traditional subsistence uses (a “C&T finding”) and to adopt regulations that provide reasonable opportunities for Alaska residents to participate in these subsistence uses. At its January 2017 meeting in Bethel, the Board made a positive C&T finding for migratory game birds in the Arctic/Western region (Units 18, 22, 23, and 26A) and then expanded this finding statewide at its November 2017 meeting.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal; there already exists a positive C&T finding for migratory game birds in Units 12, 19, 20, 21, 24, and 25.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in these hunts or in additional costs to the department.

PROPOSAL 58 – 5 AAC 92.540. Create a Controlled Use Area in the Kaiyuh Flats area of Unit 21D. Create a controlled use area in Unit 21D south of the Yukon River to restrict aircraft for moose hunting.

PROPOSED BY: Middle Yukon Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal will prevent moose hunters from using aircraft in the portion of Unit 21D south of the Yukon River downstream from Kala Creek. The proposed Controlled Use Area (CUA) would have the same boundaries as the RM831 winter hunt area that was adopted in 2019 in response to the increasing moose population and harvest opportunity.

WHAT ARE THE CURRENT REGULATIONS? There is currently no controlled use area restricting means of access in this portion of Unit 21D. Moose hunting regulations are as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(a)

(19)

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Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek

RESIDENT HUNTERS:

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
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1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder; or	Sept. 5–Sept. 25
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1 moose, by registration permit only (RM831), up to 15 days during March, however, a person may not take a cow accompanied by a calf	(Winter season to be announced)
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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 600 permits may be issued in combination	Sept. 5–Sept. 25
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with Unit 21D remainder

...

Unit 21D has a positive finding for intensive management (IM), with IM objectives for a population of 7,000–10,000 and harvest of 450–1,000 moose.

The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21, with an established amounts reasonably necessary for subsistence (ANS) of 600–800 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, opportunity to harvest moose could be reduced in the Kaiyuh area for some hunters who only use aircraft for access. The number of aircraft hunters who might shift to other means of access is unknown. If adopted, this proposal has the potential to increase competition among boat hunters on limited navigable waterways, if aircraft hunters begin using boats as a means of transportation.

BACKGROUND: The proposed Controlled Use Area (CUA) includes approximately 21% (2,559 mi²) of the land in Unit 21D (12,094 mi²). Hunter participation in this area has been stable since 2006 (avg. = 181 hunters/75 moose per year). Reported aircraft use makes up 5–6% of the hunting activity, whereas 94–95% of hunters use boats. The moose population in this portion of 21D is increasing, especially the number of cows (Figure 58-1). Current harvest levels are sustainable and the Unit 21 ANS can be provided for by the moose population in Unit 21.

An average of 181 hunters/year harvested an average of 75 moose/year in the proposed CUA during 2006–2018, including an average of 9.8 aircraft hunters who harvested an average of 4.8 moose/year. In addition, 5 cows and 3 bulls were harvested in the initial winter registration hunt (RM831) in March 2019.

The stability of hunter participation and harvest in this area is due to the combination of the drawing and registration permit management strategy, which balances maximum hunting opportunity with public concerns about overcrowding. The drawing permits for the September moose season are limited and available to both residents and nonresidents. The fall registration permits for bull moose are unlimited and available only to resident hunters and require destruction of the trophy value of the antlers. The checker-board distribution of federal lands and a limited number of nonresident drawing permits in the proposed CUA limits guiding activity.

The IM harvest objective has not been met since 2003 when the estimated harvest was 489 moose. The average estimated harvest during regulatory years 2008–2017 was 412 moose, including reported and estimated unreported harvest. The overall Unit 21D population estimate at the end of 2018 was 10,478 moose ($\pm 1,572$). The current estimated combined harvestable surplus is least 1,095 moose for Unit 21.

RM831 has a quota of 25 moose, including up to 20 cows, and is intended to slow growth of this rapidly-increasing population while maximizing hunter opportunity when river ice and daylight conditions are optimal. Moose abundance in this hunt area is estimated at 4,000–4,500 moose (approximately 39–44% of the estimated total Unit 21D moose population).

An analysis of 2001–2018 data from three Trend Count Areas (i.e., Squirrel Creek, Pilot Mtn., and Kaiyuh Slough) shows an increase in the number of moose among all age classes, and a 57% increase over the average count of 748 adult moose for the same timeframe (Figure 58-1).

In addition, analysis of the Geospatial Population Estimator data shows a significant increase: from 1,897 ±11% moose in 2011 to 4,116 ±10% moose in 2017. Analysis of the moose twinning data for the same time frame in the proposed CUA area shows high but stable twinning rates since 2004, indicating that the habitat can support this increasing population. A 265,916 acre wildfire in the Kaiyuh Flats area in 2004 likely explains the increased productivity for the area, and ultimately the increase of the moose population. The graph below shows the average total moose counted from 2001-2018: 748 moose (165 bulls & 583 cows).

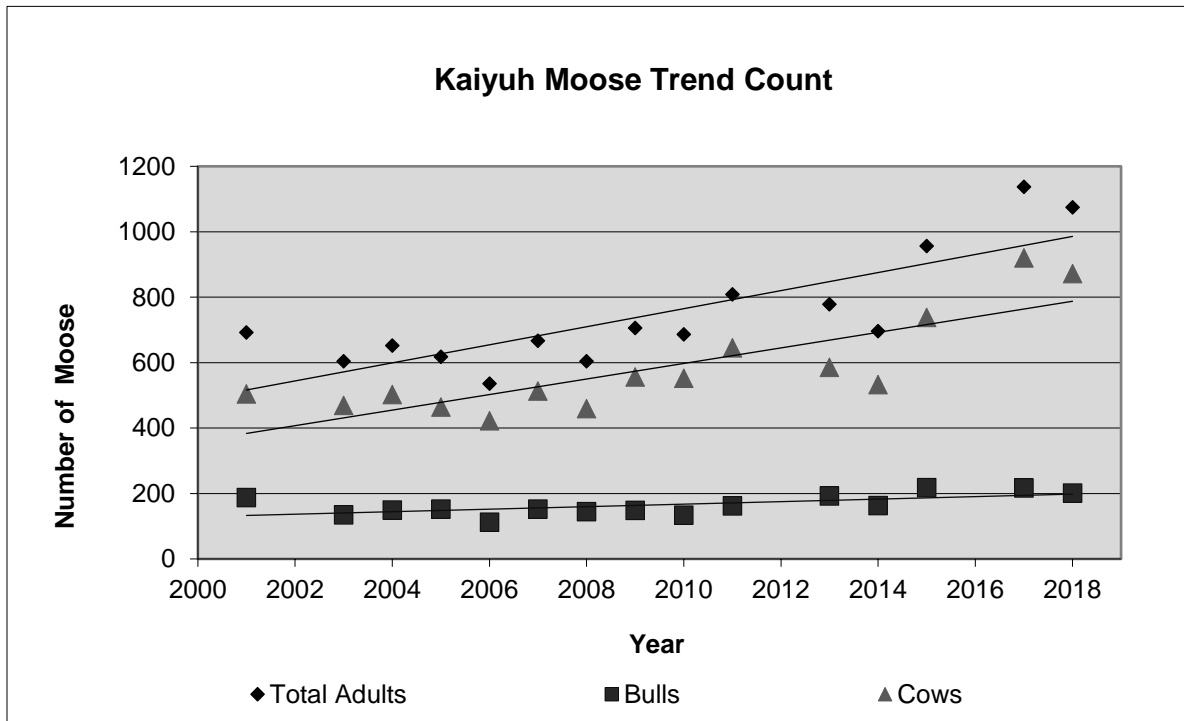


Figure 58-1. Kaiyuh Trend Count Areas combined count of adult moose, 2001–2018, Unit 21D.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal, because this is an allocation issue. If adopted, the board may wish to consider whether this CUA will be in effect during a limited time each year.

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

PROPOSAL 59 – 5 AAC 85.045(19). Add additional season dates for the RM831 permit in a portion of Unit 21D. Add a December season to the new RM831 antlerless hunt that was adopted by the board at the January 2019 meeting.

PROPOSED BY: Western Interior Regional Subsistence Advisory Council

WHAT WOULD THE PROPOSAL DO? This proposal would add 15 days in December to the RM831 any-moose winter registration hunt. The proposal requests that the harvest quota established for the winter hunt be made available first in December and if additional harvestable surplus exists at the end of that hunt, then open a March hunt.

WHAT ARE THE CURRENT REGULATIONS? The RM831 any-moose season is announced by emergency order in March when conditions allow for good success in harvesting moose and is closed after 15 days or once the quota is reached. This hunt was first opened in 2019.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(a)

(19)

...

Unit 21D, that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek

RESIDENT HUNTERS:

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder; or	Sept. 5–Sept. 25
1 moose, by registration permit (RM831) only, up to 15 days during March, however, a person may not take a cow accompanied by a calf	(Winter season to be announced)

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 600 permits may be issued in combination with Unit 21D remainder

Sept. 5–Sept. 25

...

Unit 21D has a positive finding for intensive management (IM), with IM objectives for a population of 7,000–10,000 and harvest of 450–1,000 moose.

The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21, with an established amounts reasonably necessary for subsistence (ANS) of 600–800 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would add 15 days in December to RM831, before the existing to-be-announced March hunting opportunity. It is unknown if adoption of this proposal would eliminate March hunting opportunity, change the number of days of opportunity, cause harvest in RM831 to increase, or whether additional effects would result. Some large bulls retain their antlers in December, which could generate demand for a December season.

BACKGROUND: The goals of the new 15-day to-be-announced March season (RM831) are to provide additional opportunity during a time of year when conditions allow for good success in harvesting moose, slow the growth of this moose population, and to make progress toward achieving the board’s intensive management (IM) harvest objective of 450–1,000 moose in all of Unit 21D by harvesting cows from this highly productive area. Proponents of the new March hunt expressed concern about safety of ice in early winter and lack of snow when the board considered a December option for this hunt.

An analysis of 2001–2018 data from three Trend Count Areas (i.e., Squirrel Creek, Pilot Mtn., and Kaiyuh Slough) shows an increase in the number of moose among all age classes, and a 57% increase over the average count of 748 adult moose for the same timeframe (Figure 58-1).

In addition, analysis of the Geospatial Population Estimator data shows a significant increase: from 1,897 ±11% moose in 2011 to 4,116 ±10% moose in 2017. Analysis of the moose twinning data for the same time frame in the proposed CUA area shows high but stable twinning rates since 2004, indicating that the habitat can support this increasing population. A 265,916 acre wildfire in the Kaiyuh Flats area in 2004 likely explains the increased productivity for the area, and ultimately the increase of the moose population. The graph below shows the average total moose counted from 2001–2018: 748 moose (165 bulls & 583 cows).

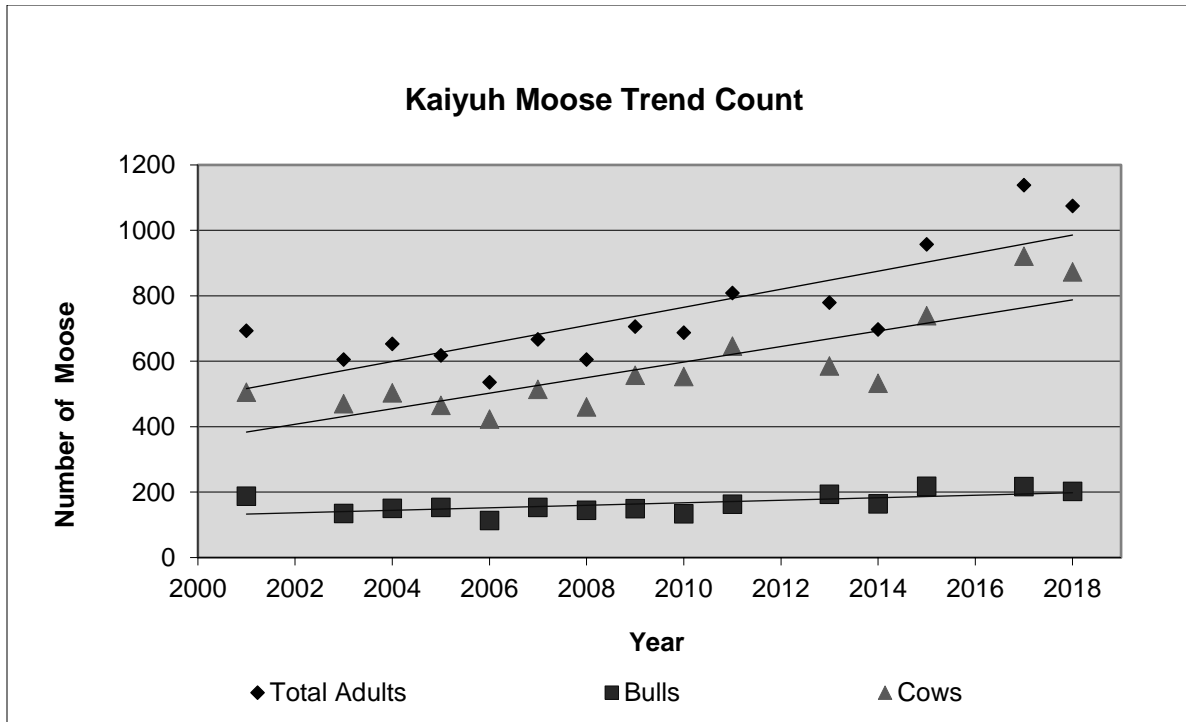


Figure 59-1. Kaiyuh Trend Count Areas combined count of adult moose, 2001–2018, Unit 21D.

The IM population objective in Unit 21D is 7,000–10,000 moose; the estimate at the end of 2018 was 10,478 moose ($\pm 1,572$). The RM831 hunt area is approximately 2,559 mi² (21%) of the 12,094 mi² encompassed by Unit 21D. The current estimated combined harvestable surplus is least 1,095 moose for Unit 21.

Moose abundance in the RM831 hunt area is estimated at 4,000–4,500 moose which is approximately 39–44% of the estimated total Unit 21D moose population. The initial harvest rate in the hunt area is ~0.5% of the pre-hunt estimate (0.9% of estimated number of cows), which is a relatively low rate initially because we intend to slow the rate of increase for the moose population, not stabilize the population. The harvest rate will be adjusted in the future depending on our most recent population estimates and our assessment of carrying capacity, as monitored by twinning surveys. Five cows and 3 bulls were harvested in the initial March 2019 hunt. The department intends to open the hunt again in March 2020, with a 2-day reporting requirement and a quota of 25 moose, including no more than 20 cows.

The IM harvest objective has not been met since 2003 when the estimated harvest was 489 moose.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The newly-implemented RM831 hunt has not been in place long enough to assess its effectiveness. Changing season dates after only one hunting season will affect the department’s ability to evaluate the effectiveness of this new opportunity. The department recommends monitoring the harvest trends and public input for the March 2020 season before implementing a change.

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

PROPOSAL 60 – 5 AAC 85.045 (a)(19). **Reauthorize a winter any-moose season in a portion of Unit 21D.** Reauthorize the antlerless moose hunting season in a portion of Unit 21D.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal will reauthorize RM831, the 15-day registration any-moose season to-be-announced during March in a portion of Unit 21D. The season has a harvest quota established by the department prior to the beginning of the season, and if the total harvest or harvest of cows reaches the quota, the season will be closed by emergency order.

WHAT ARE THE CURRENT REGULATIONS? The RM831 any-moose season is announced by emergency order in March when conditions allow for good success in harvesting moose and is closed after 15 days or once the quota is reached.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(a)		
(19)		
...		
Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek		

RESIDENT HUNTERS:

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder; or	Sept. 5–Sept. 25

1 moose, by registration permit only, up to 15 days during March, however, a person may not take a cow accompanied by a calf

(Winter season to be announced)

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 600 permits may be issued in combination with Unit 21D remainder

Sept. 5–Sept. 25

...

Unit 21D has a positive finding for intensive management (IM), with IM objectives of a population of 7,000–10,000 and harvest of 450–1,000 moose.

The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21, with an established amounts reasonably necessary for subsistence (ANS) of 600–800 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would continue to allow harvest of cows and antlerless bulls in March when conditions allow for good success in harvesting moose. Because few moose have antlers during March, hunter success is higher with an antlerless season. This will not increase harvest in excess of harvestable surplus, because there is a harvest quota for this hunt.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The goals of this antlerless moose season are to provide additional opportunity during a time of year when conditions allow for good success in harvesting moose, slow the growth of this moose population, and to make progress toward achieving the board’s intensive management (IM) harvest objective of 450–1,000 moose in all of Unit 21D by harvesting cows from this highly productive area. Reauthorizing this hunt will likely make progress toward achieving these goals.

If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost and our ability to meet Intensive Management (IM) harvest objectives could be compromised. In addition, rather than allow large population expansions and contractions, we believe it is important to manage the population for stability and a consistent harvestable surplus.

The department intends to open RM831 in March 2020, with a 2-day reporting requirement and a quota of 25 moose, with no more than 20 cows. Harvest from this hunt will make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. Five cows and 3 bulls were harvested in the March 2019 hunt, and we expect harvest to increase as more hunters begin participating in this hunt.

The IM harvest objective in Unit 21D has not been met since 2003 when the estimated harvest was 489 moose. The average estimated harvest during regulatory years 2008–2017 was 412 moose, including reported and estimated unreported harvest. This is below the IM harvest objective for the Unit 21D moose population of 10,478 moose ($\pm 1,572$). Current harvest levels are sustainable and the Unit 21 ANS can be provided for by the moose population in Unit 21.

This antlerless moose hunt area is approximately 2,559 mi² (21%) of the 12,094 mi² encompassed by Unit 21D. Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the estimated total Unit 21D moose population.

The moose population in this portion of 21D is increasing rapidly, especially the number of cows in the population (Figure 60-1). An analysis of 2001–2018 data from three Trend Count Areas (Squirrel Creek, Pilot Mtn., and Kaiyuh Slough) shows an increase in moose abundance among all age classes. Geospatial Population Estimate data also show a statistically significant increase: from 1,897 ($\pm 11\%$) moose in 2011 to 4,116 ($\pm 10\%$) moose in 2017. Moose twinning data for the same time frame from the winter any-moose hunt area shows high but stable twinning rates since 2004 (avg. = 38.7%). The graph below shows the average total moose counted from 2001–2018: 748 moose (165 bulls & 583 cows).

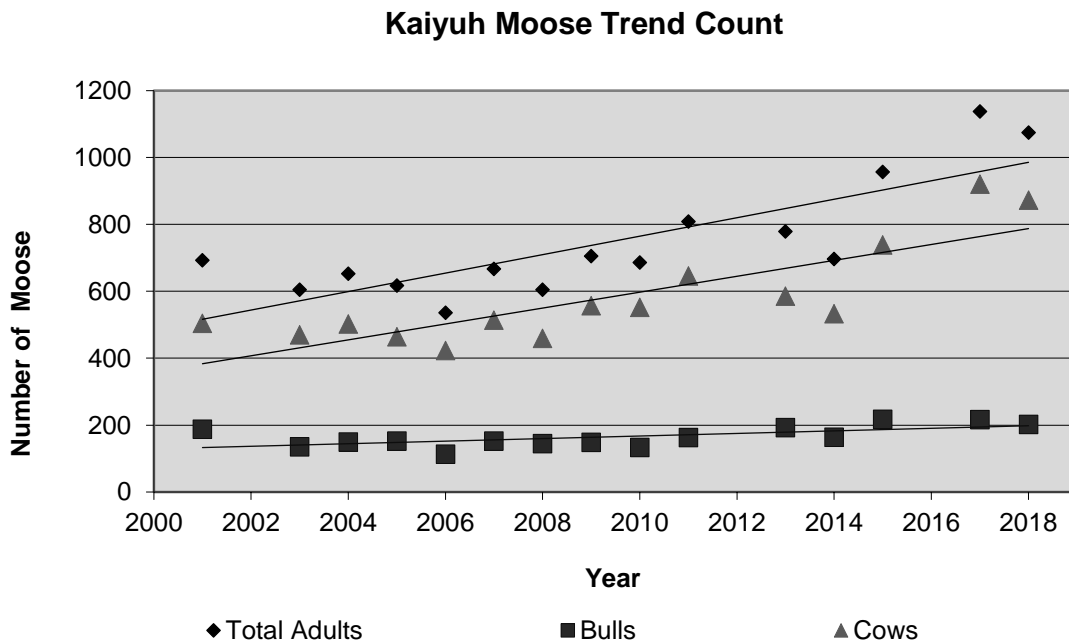


Figure 60-1. Kaiyuh Trend Count Areas combined count of adult moose, 2001–2018, Unit 21D.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. Additional harvest opportunity, including the harvest of cows, exists in this portion of 21D.

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

....

The board has made a positive C&T finding for moose in Unit 24 and an ANS of 170–270 moose.

Unit 24B has a positive finding for intensive management (IM), with IM objectives of a population of 4,000–4,500 and IM harvest objective of 150–250 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adding 6 days of harvest opportunity to the end of the September 1–25 moose season, by extending it to September 1–October 1, would match the federal season. For this population, the 6 days of harvest opportunity during the rut could delay calving. Subsequently, these younger calves would be more prone to winter mortality, likely affecting the ability of this population to meet IM population objectives. Although harvest and hunter success would increase by an unknown amount, but likely by fewer than 10 moose (current daily harvest averages 1.4 moose/day), in the localized area requested by this proposal, an additional 10 moose would result in a harvest rate increase of as much as 1.3–2.5% of the KCUA’s low density moose population.

BACKGROUND: The moose population in Unit 24B, including the KCUA, remains at low density. The 2017 estimate of 3,203 (± 850) observable moose is below the IM population objective of 4,000–4,500 moose (0.29–0.33 moose/mi².) The population in the KCUA portion of Unit 24B increased from 0.22 moose/mi² in 2007 (prior to wolf control) to 0.48 moose/mi² in 2017, although the Unit 24B moose population outside the wolf control area (which included some state and Alaska Native corporation lands within the KCUA) did not experience a similar increased population density.

Because survival of calves and yearlings is low in this low-density population and the potential for high overwinter mortality exists, the management strategy is conservative and avoids introducing any factors that could potentially disrupt the peak of rut. While productivity in the KCUA is high (average twinning rate is 47%), calf survival to adulthood (reproductive age) is low, with 40 calves and 10 yearling bulls per 100 cows in the fall. Furthermore, while winters 2013–2014 and 2016–2017 were mild, a snowfall of >30-inches in Bettles during early December 2019 illustrates that the potential for high overwinter mortality remains a concern.

The late September hunt proposed would occur during the 10- to 12-day peak in the breeding period of the rut (Miquelle 1991, Van Ballenberghe and Miquelle 1993). Because cow moose estrus lasts only 15–26 hours (Schwartz and Hundertmark 1993), there is a potential of some level of disruption to breeding groups from hunt during that time (Franzman and Schwartz 1998). Satellite bulls seldom stay with harems for long periods (Bubenik 1998), so delayed replacement of harvested harem bulls has the potential to miss the estrus window of the individual cow, or cows may not be receptive to sub-dominant bulls. Mysterud et al. (2002) stated that young bulls may not induce estrus in cows and that calving is delayed with a young male age structure. Therefore, concerns about potential disruption of the peak breeding period is analogous to low bull-to-cow ratios or young-bull age structures in a population that predicts delayed breeding of cows. Furthermore, late born calves are more prone to winter mortality (Schwartz et al. 1994, Keech 2000). Because the amount of potential disruption is unknown, a management strategy to mitigate the effect cannot be planned.

There are 146 days of hunting opportunity in the KCUA portion of Unit 24B under current state moose hunting seasons: during September 1–25, and December 15–April 15. There are an additional 13 days on federal lands (58% of KCUA lands) for federally qualified hunters in that area. Despite the increasing population and high bull-to-cow ratios in the KCUA, federal lands in this area are closed to moose hunting except by federally qualified hunters within the federally defined KCUA, which is larger than the state-defined KCUA. Therefore, there are zero days of opportunity on the federal lands of the KCUA for hunters who are not federally qualified. In the remainder of Unit 24B on federal lands, there are up to 258 days of hunting opportunity for federally-qualified hunters, during August 1–April 15. Moose hunting on these federal lands is closed to the taking of moose except by residents of Unit 24, Koyukuk, and Galena, by state harvest ticket. The department was opposed to the late September–early October federal season with which this proposal seeks to align. We also opposed the federal KCUA closure to non-federally qualified hunters because an opportunity for additional bull harvest exists (although not during the critical 10- to 12-day breeding period).

The board may want to consider the ANS compared to harvestable surplus and harvest history. The average reported harvest for all of Unit 24B during regulatory years 2011 through 2018 (RY2011–RY2018; e.g., RY2011 is 1 July 2011 through 30 June 2012) for all hunters was 35.3 moose/year. Based on Subsistence Division household surveys, including harvest reported on a report form, the estimated average annual harvest is 65 moose, which is below the IM harvest objective of 150–250 moose. Due to incomplete reporting, location of harvest does not allow us to determine the proportion of harvest in 24B that occurs exclusively within the KCUA. Harvest in Unit 24B was stable during this period (Table 61-1). Household subsistence surveys estimated annual harvest by residents of Allakaket and Alatna was 17.7 moose/year during the IM wolf control program conducted during 2011–2017 within the KCUA. The average reported and estimated unreported harvest for all of Unit 24 during RY2009–RY2018 for all hunters was 316 moose/year.

Table 61-1. Moose harvest in Unit 24B compiled from harvest reporting data collected by the Division of Wildlife Conservation and the Division of Subsistence, RY2011–RY2018.

Regulatory Year	Allakaket/Alatna Household Surveys	Harvest Reports ^b		
	Estimated Harvest	Allakaket/Alatna harvest reports in 24B	Other Hunters in 24B	All Harvest Reports in 24B ^d
2011	16.2	4	28	32
2012	18.7	13	26	39
2013	11.8	3	24	27
2014	20.0	12	37	49
2015	18.3	7	27	34
2016	20.7	12	20	32
2017	18.0	10	31	41
2018	n/a	7	21	28
Avg.	17.7	8.5	26.8	35.3

^aAlatna and Allakaket weighted averages calculated from Subsistence Division household surveys.

^bUnit 24B harvest reported on permits and harvest tickets.

^cA regulatory year is 1 July to 30 June (e.g., regulatory year 2011 is 1 July 2011 through 30 June 2012)

^dAn unknown amount of moose harvest has been reported on federal harvest reporting mechanisms.

The moose population in Unit 24B is estimated at 2,353–4,053 moose and has trended upward since 2011. The moose population is estimated to be at the lower end or below the population objective of 4,000–4,500 moose. Data suggest mild winters during 2013–2014 and 2016–2017 combined with wolf control during RY2012–RY2016 contributed to the population increase. Although mortality of young is high, bull-to-cow ratios were stable and averaged 62 bulls per 100 cows on the Kanuti National Wildlife Refuge Survey Area in Unit 24B during RY1989–RY2017.

DEPARTMENT COMMENTS: The department **SUPPORTS** the additional harvest opportunity and while additional opportunity for bull harvest exists, the critical 10- to 12-day breeding period should be avoided. This proposal would align the state season with the federal season. However, the department is concerned that introducing any factor that may decrease recruitment (such as disruption of the rut) into this low-density population that experiences high natural mortality. Such action has potential to reverse the positive population trend, jeopardizing progress toward meeting the IM objectives.

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

PROPOSAL 62 – 5 AAC 92.069. Special provisions for moose drawing permit hunts.

Change the permit allocation in Unit 21B (upper Nowitna area) to 90% to residents and up to 10% percent to nonresidents and allocate surplus nonresident drawing permits to resident hunters only.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would change the current allocation of permits between resident and nonresident hunters in a corridor extending 2 miles on either side of the upper Nowitna River in Unit 21B for drawing permits DM809, DM810, and DM811 to a 90% resident and up to 10% nonresident allocation instead of the current 50% resident and 50% nonresident allocation. The proposal would also require surplus nonresident drawing permits be made available to residents.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.069. Special provisions for moose drawing permit hunts.

...

(b) The department shall issue permits as follows:

(3) In Unit 21B, that portion within the Nowitna River drainage and within the corridor extending two miles on either side of and including the Nowitna River, the drawing permit hunt is allocated 50 percent to residents and 50 percent to nonresidents; the department shall issue a maximum of 75 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 25 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of nonresidents applying for permits for either nonresident hunt is insufficient to award the required percentage, the department may award the remaining available nonresident drawing permits to the other nonresident hunt;

...

5 AAC 85.045

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(a)

(19)

...

Unit 21B, that portion within the Nowitna River drainages upstream from the Little Mud River drainage and outside a corridor extending two miles on either side of and including the Nowitna River

RESIDENT HUNTERS:

1 bull Aug. 22–Aug. 31
Sept. 5–Sept. 25

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers Sept. 5–Sept. 25
with 4 or more brow tines on one side,

Remainder of Unit 21B,

RESIDENT HUNTERS:

1 bull by registration permit Aug. 22–Aug. 31
only; or Sept. 5–Sept. 25

1 bull by drawing permit only; Sept. 5–Sept. 25
up to 300 permits may be issued in
Unit 21B

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers Sept. 5–Sept. 25
with 4 or more brow tines on one side
by drawing permit only; up to 300
permits may be issued in Unit 21B

...

The trophy value of moose taken under the registration hunt (RM834) in the remainder of 21B must be destroyed.

Unit 21B has a positive finding for intensive management (IM), with IM objectives for a population of 4,000–6,000 and harvest of 200–300 moose.

The board made a positive C&T for moose all of Unit 21, with an established ANS of 600–800 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Availability of the limited number of permits for the upper Nowitna hunt area in Unit 21B for drawing hunts DM809, DM810, and DM811 would be allocated 90% to residents and up to 10% for nonresidents. Surplus nonresident drawing permits would be made available to resident hunters instead of to nonresident hunters.

BACKGROUND: Unit 21B permits are allocated according to the board’s finding *Nonresident Drawing Permit Allocation Policy* (2007-173-BOG), which requires allocations for specific hunts to be decided individually, based on historic patterns of nonresident and resident use over the past 10 years. The department issues undersubscribed permits in accordance with 5 AAC

92.069 which recognizes the allocation between guided and unguided hunters, and these permits are made available through the Fairbanks ADF&G office similar to registration permits. In 2008, the board allocated 50% of the moose drawing permits to residents (DM810) and 50% to nonresidents (DM809 and DM811). The allocation between residents and nonresidents was decided based on historic patterns of participation. Of the 50% nonresident allocation, 75% of those permits were to be issued to guided nonresidents (DM811) with the remaining 25% to unguided nonresidents (DM809).

The department has issued 20 drawing permits for all 3 hunts combined since the RY09 allocation was implemented (DM809 = 3 permits, DM810 = 10 permits, DM811 = 7 permits). This is consistent with the proportion of resident-to-nonresident hunter participation and harvest during RY1997–RY2006, prior to the implementation of the drawing permit system (Table 62-1).

Table 62-1. Resident and nonresident moose hunters and harvest in Unit 21B compiled from data collected by the Division of Wildlife Conservation, before and after implementation of drawing permit allocations in regulatory year RY2006^a.

Unit and regulatory years	Avg. number of resident hunters	Avg. number of nonresident hunters	Avg. resident harvest	Avg. nonresident Harvest
Unit 21B – All				
1997–2006	168	28	63	11
2007–2018 ^b	195	25	67	10
Upper Unit 21B				
1997–2006	15 (63%)	9 (37%)	8	5
2007–2018 ^c	15 (60%)	10 (40%)	9	6

^aA regulatory year is 1 July to 30 June (e.g., RY2018 is 1 July 2018 through 30 June 2019)

^bIncludes hunts GM000, RM834, DM802, DM805, DM806, DM808, DM809, DM810, and DM811

^cIncludes hunts GM000, RM834, DM809, DM810, and DM811

The department issued surplus nonresident permits according to regulatory language in 5 AAC 92.069 (Table 62-2). Guided allocation never exceeded 75% and nonguided allocation always had a minimum of 25%.

Table 62-2. Guided and unguided nonresident moose hunters and harvest in Unit 21B upper Nowitna corridor using harvest reporting data collected by the Division of Wildlife Conservation, regulatory years RY2008–RY2019^a.

Regulatory year	DM809 (nonguided)			DM811 (guided)		
	Number of permits	%	surplus	# permits	%	surplus
2009	2	25%	0	6	75%	1
2010	3	30%	0	7	70%	4
2011	3	30%	0	7	70%	0
2012	3	30%	0	7	70%	0

Regulatory year	DM809 (nonguided)			DM811 (guided)		
	Number of permits	%	surplus	# permits	%	surplus
2013	3	30%	0	7	70%	0
2014	3	33%	0	6	67%	1
2015	3	30%	0	7	70%	3
2016	3	30%	0	7	70%	0
2017	3	30%	0	7	70%	2
2018	3	30%	0	7	70%	7
2019	3	30%	0	7	70%	4
average		29.8%			70.2%	

^aA regulatory year is 1 July to 30 June (e.g., RY2018 is 1 July 2018 through 30 June 2019)

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocation issue. The board may wish to re-evaluate the current allocation pattern based on the updated finding *Nonresident Hunter Allocation Policy (2017-222-BOG)*.

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

PROPOSAL 63 – 5 AAC 92.530. Management areas. Repeal the Dalton Highway Corridor Management Area regulation.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? The proposal would repeal the Dalton Highway Corridor Management Area in 5 AAC 92.530(7).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.530. Management areas.

...

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24–26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area;

(B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway Corridor Management Area is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no motorized vehicle may be used to transport hunters, hunting gear, or parts of game, within the Dalton Highway Corridor Management Area, except that

(i) licensed highway vehicles may be used on the following designated roads:

(1) Dalton Highway,

(2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the trail is open for winter travel,

(3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open,

(4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility,

(5) the Sagavanirktok River access road two miles north of Pump Station 2, and

(6) any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;

(ii) aircraft and boats may be used;

(iii) a snowmachine may be used to cross the management area from land outside the management area to access land on the other side of the management area;

(iv) game may be transported by motorized vehicle unless prohibited by statute;

(D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area;

...

AS 16.05.789. Prohibition on hunting adjacent to highway between Yukon River and Arctic Ocean.

(a) Hunting with firearms is prohibited north of the Yukon River in the area within five miles on either side of the highway between the Yukon River and the Arctic Ocean.

(b) A person who violates this section is guilty of a class A misdemeanor.

AS 19.40.210. Prohibition of off-road vehicles.

(a) Off-road vehicles are prohibited on land within the highway corridor. However, this prohibition does not apply to

(1) off-road vehicles necessary for oil and gas exploration, development, production, or transportation;

(2) a person who holds a mining claim in the vicinity of the highway and who must use land in the highway corridor to gain access to the mining claim;

(3) the use of a snow machine to travel across the highway corridor from land outside the corridor to access land outside the other side of the corridor; this paragraph does not permit the use of a snow machine for any purpose within the corridor if the use begins or ends within the corridor or within the right-of-way of the highway or if the use is for travel within the corridor that is parallel to the right-of-way of the highway; or

(4) a person who must use land in the highway corridor to gain access to private property that

(A) is located outside the corridor; and

(B) has an established history of use as a homestead.

(b) Nothing in this section authorizes a person to access the land of another person unlawfully.

(c) In this section, “highway corridor” or “corridor” means land within five miles of the right-of-way of the highway.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Repeal of the DHCMA will reduce the number of inadvertent violations that are occurring. It will also reduce confusion for hunters and trappers who do not understand what actions are specifically allowed and not allowed in the DHCMA. Because this regulation is largely redundant with Alaska Statutes, use of motorized vehicles by hunters and trappers will continue relatively unchanged.

BACKGROUND: The department has no biological concerns for game populations that are a result of hunting, trapping, and transportation methods used by hunters and trappers within the DHCMA. Hunting and trapping are managed effectively by seasons and bag limits within the DHCMA and in adjacent game management units.

There is public confusion and frustration with inconsistent agency interpretation of the multi-tiered legal framework. Redundant state and federal laws defining use of the DHCMA are complex and not always clearly in alignment with one another. For nearly 40 years significant improvement and expansion of the corridor’s road system occurred, which has broadened the public’s expectations of which uses within the corridor should be allowed under the law. For example, members of the public expect to be able to drive vehicles to Nuiqsut, Bettles, Coldfoot, Wiseman, or Anaktuvuk Pass, and subsequently hunt (a violation of the DHCMA regulation), similar to the ability to drive to Galbraith Lake and hunt. Consequently, the public experiences confusion and frustration with the complexity of the management regime, resulting in frequent and inadvertent violations within the DHCMA.

The DHCMA in Units 20, 24, 25, and 26 extends 5 miles from each side of the Dalton Highway, from the Yukon River to the Arctic Ocean, and includes the Prudhoe Bay Closed Area. The initial reference to the DHCMA occurred in 1974 when the department issued an Emergency Order defining the corridor and the accompanying restrictions that closed the area to big game hunting. Emergency regulations were adopted in 1978. In 1980, the Alaska State Legislature promulgated the DHCMA in Alaska statutes AS 19.40.210 and AS 16.05.789, and in 1983 the board adopted the DHCMA hunting regulations in 5 AAC 92.530(7). Since 1983, the Legislature and the board have enacted multiple changes to these statutes and regulations.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. If the regulation is not repealed or regulations and statutes substantially revised, enforcement is likely to become more controversial as the extent of violations becomes more apparent to the public (e.g., hunters driving to the Coldfoot airstrip to originate a hunt, or people driving home to Nuiqsut and subsequently hunting). There are no biological concerns for wildlife; however, the complexity of regulations associated with the corridor results in confusion by various user groups. Two options could reduce confusion and clarify legal uses by hunters and trappers in the DHCMA. Repeal of the DHCMA would eliminate one layer of redundancy in the laws. A second option would be to revise the DHCMA regulation so that it uses exactly the same terms as statutes. This could reduce the number of inadvertent violations that result from confusion with current Alaska statutes and would not change existing uses. Neither repeal nor revision of the regulation would result in increased use by hunters and trappers, because statutes and land management regulations are redundant. Land management agencies are better suited than the board or the department to regulate land access. This would allow the board and the department to change seasons and bag limits, if needed, to manage wildlife population in the DHCMA.

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

PROPOSAL 64 – 5 AAC 92.530. Revise the Dalton Highway Corridor Management Area. Revise the Dalton Highway Corridor Management Area regulation.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? The proposal is seeking clarification from the board, and input from the public regarding what both would like to see in regulation regarding the stretch of land within five miles of either side of the James Dalton Highway between the Yukon River and the Arctic Ocean,

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.530. Management areas.

...

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24–26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area;

(B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway Corridor Management Area is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no motorized vehicle may be used to transport hunters, hunting gear, or parts of game, within the Dalton Highway Corridor Management Area, except that

(i) licensed highway vehicles may be used on the following designated roads:

(1) Dalton Highway,

(2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the trail is open for winter travel,

(3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open,

(4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility,

(5) the Sagavanirktok River access road two miles north of Pump Station 2, and

(6) any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;

(ii) aircraft and boats may be used;

(iii) a snowmachine may be used to cross the management area from land outside the management area to access land on the other side of the management area;

(iv) game may be transported by motorized vehicle unless prohibited by statute;

(D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area;

...

AS 16.05.789. Prohibition on hunting adjacent to highway between Yukon River and Arctic Ocean.

(a) Hunting with firearms is prohibited north of the Yukon River in the area within five miles on either side of the highway between the Yukon River and the Arctic Ocean.

(b) A person who violates this section is guilty of a class A misdemeanor.

AS 19.40.210. Prohibition of off-road vehicles.

(a) Off-road vehicles are prohibited on land within the highway corridor. However, this prohibition does not apply to

(1) off-road vehicles necessary for oil and gas exploration, development, production, or transportation;

(2) a person who holds a mining claim in the vicinity of the highway and who must use land in the highway corridor to gain access to the mining claim;

(3) the use of a snow machine to travel across the highway corridor from land outside the corridor to access land outside the other side of the corridor; this paragraph does not permit the use of a snow machine for any purpose within the corridor if the use begins or ends within the corridor or within the right-of-way of the highway or if the use is for travel within the corridor that is parallel to the right-of-way of the highway; or

(4) a person who must use land in the highway corridor to gain access to private property that

(A) is located outside the corridor; and

(B) has an established history of use as a homestead.

(b) Nothing in this section authorizes a person to access the land of another person unlawfully.

(c) In this section, “highway corridor” or “corridor” means land within five miles of the right-of-way of the highway.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Revising the DHCMA regulation will reduce the number of inadvertent violations that are occurring. It will also reduce confusion for hunters and trappers who do not understand what actions are specifically allowed and not allowed in the DHCMA. Because the regulation is largely redundant with Alaska Statute, use will continue relatively unchanged.

BACKGROUND: The department has no biological concerns for game populations that are a result of hunting, trapping, and transportation methods used by hunters and trappers within the DHCMA. Hunting and trapping are managed effectively by seasons and bag limits within the DHCMA and in adjacent game management units.

There is public confusion and frustration with inconsistent agency interpretation of the multi-tiered legal framework. Redundant state and federal laws defining use of the DHCMA are

complex and not always clearly in alignment with one another. For nearly 40 years significant improvement and expansion of the corridor’s road system occurred, which has broadened the public’s expectations of which uses within the corridor should be allowed under the law. For example, members of the public expect to be able to drive vehicles to Nuiqsut, Bettles, Coldfoot, Wiseman, or Anaktuvuk Pass, and subsequently hunt (a violation of the DHCMA regulation), similar to the ability to drive to Galbraith Lake and hunt. Consequently, the public experiences confusion and frustration with the complexity of the management regime, resulting in frequent and inadvertent violations within the DHCMA.

The DHCMA in Units 20, 24, 25, and 26 extends 5 miles from each side of the Dalton Highway, from the Yukon River to the Arctic Ocean, and includes the Prudhoe Bay Closed Area. The initial reference to the DHCMA occurred in 1974 when the department issued an Emergency Order defining the corridor and the accompanying restrictions that closed the area to big game hunting. Emergency regulations were adopted in 1978. In 1980, the Alaska State Legislature promulgated the DHCMA in Alaska statutes AS 19.40.210 and AS 16.05.789, and in 1983 the board adopted the DHCMA hunting regulations in 5 AAC 92.530(7). Since 1983, the Legislature and the board have enacted multiple changes to these statutes and regulations.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to reduce confusion and clarify legal uses by hunters and trappers in the DHCMA. Revision of the regulation so that it uses exactly the same terms as statutes could reduce the number of inadvertent violations that result from confusion with current Alaska statutes and would not change existing uses. Repeal of the DHCMA would eliminate one layer of redundancy in the laws. Neither revision nor repeal of the regulation would result in increased use by hunters and trappers, because statutes and land management regulations are redundant. Land management agencies are better suited than the board or the department to regulate land access. This would allow the board and the department to change seasons and bag limits, if needed, to manage wildlife populations in the DHCMA.

If the regulation is not repealed or substantially revised, enforcement is likely to become more controversial as the extent of violations becomes more apparent to the public (e.g., hunters driving to the Coldfoot airstrip to originate a hunt, or people driving home to Nuiqsut and subsequently hunting).

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

PROPOSAL 65 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Establish a new, resident only, general season hunt for caribou in Unit 20F.

PROPOSED BY: Tanana–Rampart Manley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The bag limit for caribou in Unit 20F North of the Yukon River (excluding the Dalton Highway Corridor Management Area) for residents would increase to 2 caribou total during August 10–March 31, only one of which could be taken before November 1.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(a)		
(15)		
...		
Unit 20(F), north of the Yukon River		
RESIDENT HUNTERS		
1 caribou	Aug. 10–Mar. 31	
NONRESIDENT HUNTERS		
1 caribou		Aug. 10–Sept. 30
...		

There is a positive C&T finding for caribou in Units 20F, 21B, 21C, 21D and 24, with an ANS of 150–200. These C&T and ANS findings are for the Galena Mountains, Wolf Mountains, and Ray Mountains herds combined.

There is a negative Intensive Management (IM) finding for the Ray Mountains herd. There are also negative IM findings for the Galena Mountains and Wolf Mountains herds.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, caribou harvest by residents who hunt the RMH in Unit 20F could increase.

BACKGROUND: There is limited information available for the RMH, therefore it is managed conservatively. Despite conservative management and low reported harvest, minimum population counts indicate that the RMH has been declining since 2000 (Figure 65-1). Furthermore, these minimum counts declined from 1,213 to 679 caribou between 2011 and 2019, indicating that the RMH cannot sustain additional harvest. During 2000–2011 the average peak count was 1,242 caribou. During 2014–2019 the average peak count was 749 caribou, a 40% decrease in the peak minimum counts.

Small herds such as the RMH are usually predator limited and have low recruitment rates. Therefore, the department estimates the harvestable surplus at 2–3% of the estimated population (a lower rate than larger herds.) This allows for a total harvest of 15–20 caribou per year.

Unreported harvest is a concern. The requirement that residents who live north of the Yukon River must obtain caribou harvest tickets was first implemented in 2016 and it is likely that not

all local residents are aware of this regulatory change. An estimated 3–5 caribou are harvested from the Rampart–Tanana portion of the Yukon River and an additional 5–7 are harvested using snowmachines in the winter. Subsistence household surveys indicate that 8–13 caribou were potentially harvested annually in Unit 24B during 2013–2017 within the range of the RMH (Brown et al. 2016.)

Hunting mortality appears to be low. The annual reported harvest from the RMH was 0–10 caribou (average = 3.6) during regulatory years 2013 through 2017 (RY13–RY17; i.e., RY13 = July 1, 2013 through June 30, 2014). However, combined with estimated unreported harvest, the estimated harvestable surplus is being exceeded (Figure 65-2).

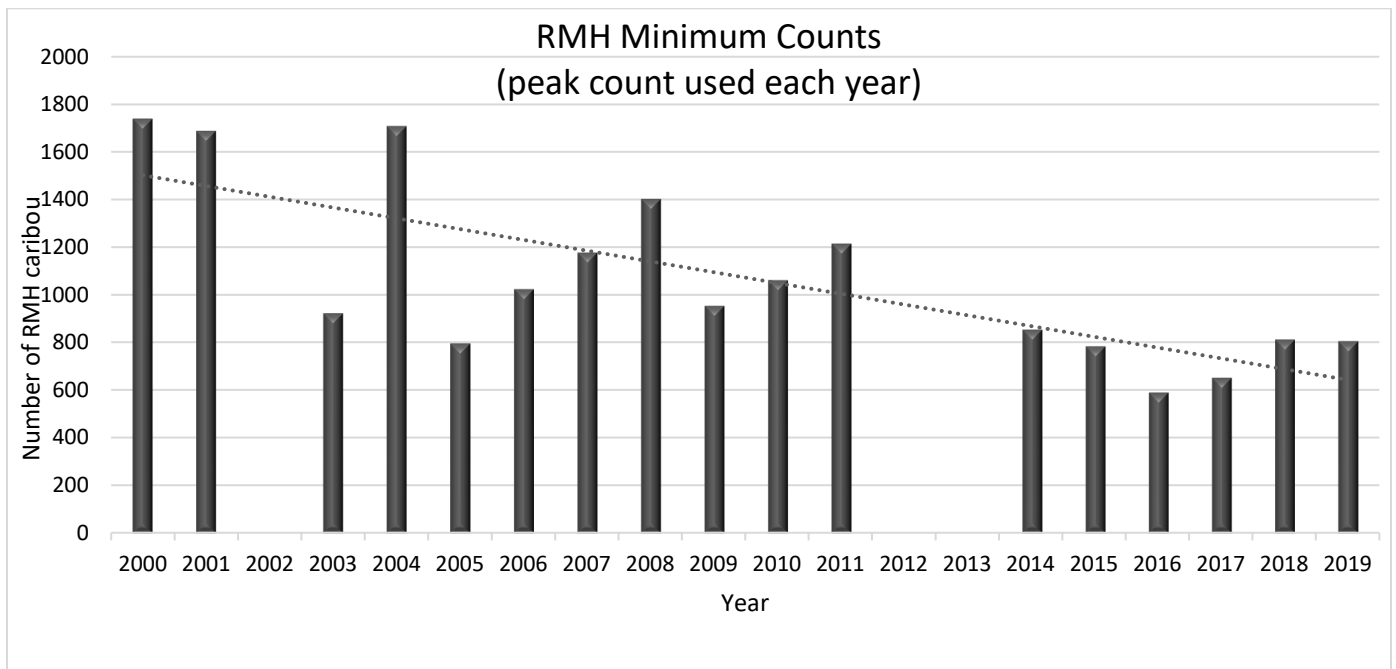


Figure 65-1. Ray Mountains Caribou Herd minimum counts 2000–2019 (missing data indicates years without surveys).

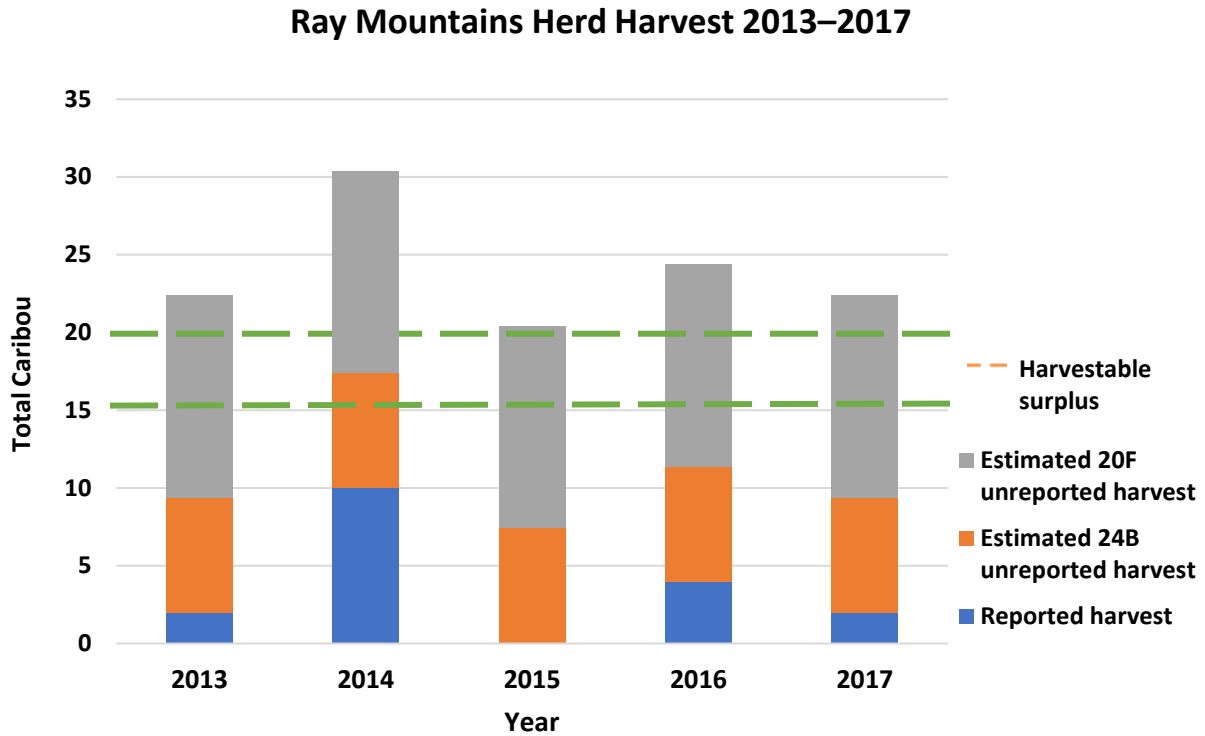


Figure 65-2. Ray Mountains Caribou Herd Harvest 2013–2017.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because there is a harvestable portion of approximately 15–20 caribou per year and total harvest likely exceeds the harvestable surplus. The department has conservation concerns regarding this herd, will continue to monitor the population, and will submit a proposal should the bag limit or season dates need adjusting in the future. If outside the Board cycle the Department can use its Emergency Order authority to restrict or close hunting if necessary for conservation.

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

PROPOSAL 67 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear and 5 AAC 92.132. Bag limit for brown bears. Increase the resident bag limit for brown bears in Unit 21D.

PROPOSED BY: Middle Yukon Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal seeks to increase the resident bag limit of brown bears from 1 to 2 bears per regulatory year in Unit 21D.

WHAT ARE THE CURRENT REGULATIONS?

Brown bear regulations in Unit 21D are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.

Open to	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	<i>One bear</i> <ul style="list-style-type: none"> • <i>Hide and skull salvage required</i> • <i>Sealing required within 30 days of kill.</i> • <i>Spring and fall baiting allowed.</i> 	Aug 10-June 30
Residents	One bear by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> • <i>Meat salvage REQUIRED for human consumption</i> • <i>Permit must be obtained in advance</i> • <i>Hide and skull salvage NOT required</i> • <i>Sealing not required, unless removed from subsistence area or tanned.</i> • <i>If sealed, the skin of the head & front claws are removed & kept by ADF&G.</i> • <i>No aircraft use allowed.</i> • <i>Subject to Failure to Report penalties.</i> 	Aug 10-June 30

There is a positive C&T finding for brown bears in Units 21 and 22 combined, and an ANS of 20–25 in Units 21 and 22 combined.

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

Harvest of brown bears at bear bait stations is allowed in Unit 21D with the following season dates:

- August 10–September 30;
- April 15–June 30.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The bag limit of brown bears would increase from 1 to 2 bears per regulatory year in Unit 21D. This proposal would likely result in an additional annual harvest of 0–6 brown bears, based on similar bag limits and harvest rates in other parts of Region III. Hunters would have additional opportunity to harvest brown bears and the bag limit would no longer be aligned with nearby Units 21B, 21C, and 24D, but would be aligned with 21E. Brown bears harvested in Unit 21D by residents would also be legal to be sold.

BACKGROUND: Additional brown bears could be sustainably harvested in Unit 21D, providing more opportunity for resident hunters.

Estimates of known bear densities in similar habitats in Interior Alaska are used to estimate a brown bear population of 350–400 in Units 21B, 21C and 21D, combined. The management

objective for Units 21B, 21C and 21D, combined, is to manage a brown bear population that will sustain a 3-year mean harvest of at least 25 bears (50% males). Harvest was below this level during RY16–RY18, at 17 bears/year (63% males). Based on a conservative estimated sustainable harvest rate of 5–6%, the bear population in these units can sustain an annual harvest of at least 18–24 bears/year (50% males). Residents reported taking 38% of the harvest and nonresidents took 62%. In Unit 21D the average annual reported harvest during RY16–RY18 was 10 bears.

The 20-year harvest trend in the Galena Area (including Unit 21D) indicates that harvest remained stable even though bag limits, seasons, and methods were expanded during this time. Males were harvested at a higher rate than females. Average ages of harvested bears in the Galena Area remained stable, indicating that the population was not overexploited.

Two-bear bag limits and spring brown bear baiting are available to hunters in Units 19A, 19D and 20E. Unit 19D also has fall brown bear baiting, which has the broadest season and bag limit in Region III. The harvest data from these units were used to determine potential additional harvest if this proposal is adopted. The reported annual harvest since RY12 for those units indicates that most hunters do not take more than 1 bear per year. Three of 35 hunters in 19A, 0 of 24 hunters in 19D, and 6 of 109 hunters in 20E harvested 2 bears/year.

DEPARTMENT COMMENTS: The department **SUPPORTS** expanded hunter opportunity, since there are no biological concerns. The department also urges the Board to consider expanding non-resident opportunity given the harvestable surplus.

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

PROPOSAL 68 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.
Establish a fall bear baiting season in Unit 21C.

PROPOSED BY: Craig Hill

WHAT WOULD THE PROPOSAL DO? This proposal seeks to allow harvest of brown and black bears during August 1–September 30 at registered bear bait stations in Unit 21C. If adopted hunters would be able to take black bears at bait stations in Unit 21C from August 1 - September 30, and brown bears at bait stations from August 10 - September 30.

WHAT ARE THE CURRENT REGULATIONS?

Brown bear regulations in Unit 21C are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.

- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- There is a positive C&T finding for brown bears in Units 21 and 22 combined, with an ANS of 20-25 bears, combined.

Open to	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	<i>One bear</i> <ul style="list-style-type: none"> • <i>Hide and skull salvage required</i> • <i>Sealing required within 30 days of kill</i> • <i>Spring baiting allowed April 15–June 30</i> 	Aug 10–June 30

Black bear regulations in Unit 21C are as follows:

- *No resident locking-tag required.*
- *Sealing not required*
- *Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.*
- *Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.*
- *There is a positive C&T finding for black bears in Unit 21 with no established ANS.*

Open to	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	<i>Three bears</i> <ul style="list-style-type: none"> • <i>Meat salvage required (January 1–May 31)</i> • <i>Meat or hide (with claws attached) salvage required (June 1–December 31)</i> • <i>No sealing requirement</i> • <i>Spring baiting allowed April 15–June 30</i> 	No closed season

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Harvest of brown and black bears at registered bear bait stations in Unit 21C would be allowed for an additional 61 days during the fall. This may result in increased harvest.

BACKGROUND: The board first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014, and Unit 21C in 2017. Since 2012, there has been an annual average of 26 black bear bait stations registered in these units. The reported annual harvest from Regulatory Year 2012 (RY12; i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18 for those units shows an average of fewer than 1 brown bear per year was harvested over bait. There is no sealing or harvest ticket requirement for black bears in Unit 21C, but with an annual average of 6 bait sites registered (RY12–RY18) the department believes black bear harvest is low.

The 20-year trend in the harvest data in the Galena Area (including Unit 21C) indicated that brown bear harvest was stable even though bag limits, seasons, and methods were broadened.

Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the Galena Area population was not over-exploited.

DEPARTMENT COMMENTS: The department **SUPPORTS** aspects of this proposal to provide additional hunting opportunity, because it does not cause any biological concerns with brown or black bear harvest in Unit 21C. Based on harvest history the department does not anticipate additional brown and black bear harvest that might occur at bait sites in Unit 21C to increase to unsustainable levels.

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

PROPOSAL 69 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.
Establish a fall bear baiting season in Unit 21C.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal seeks to allow harvest of brown and black bears during August 1–September 30 at registered bear bait stations in Unit 21C. If adopted hunters would be able to take black bears at bait stations in Unit 21C from August 1 - September 30, and brown bears at bait stations from August 10 - September 30.

WHAT ARE THE CURRENT REGULATIONS?

Brown bear regulations in Unit 21C are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- There is a positive C&T finding for brown bears in Units 21 and 22 combined, and an ANS of 20–25 bears combined.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21C	<i>One bear</i> <ul style="list-style-type: none"> • <i>Hide and skull salvage required</i> • <i>Sealing required within 30 days of kill</i> • <i>Spring baiting allowed April 15–June 30</i> 	Aug 10–June 30

Black bear regulations in Unit 21C and adjacent areas are as follows:

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21C, 24	<i>Three bears</i> <ul style="list-style-type: none"> • <i>Meat salvage required (January 1– May 31)</i> • <i>Meat or hide (with claws attached) salvage required (June 1– December 31)</i> • <i>No sealing requirement</i> • <i>Spring baiting allowed April 15–June 30</i> • <i>There are positive C&T findings for black bears in Unit 21 and in Unit 24 but no established ANS in either unit.</i> 	No closed season

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Harvest of brown and black bears at registered bear bait stations in Unit 21C would be allowed for an additional 61 days during the fall, which may result in increased harvest.

BACKGROUND: The board first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014, and Unit 21C in 2017. Since 2012, there has been an annual average of 26 black bear bait stations registered in these units combined. The reported annual harvest from Regulatory Year 2012 (RY12; i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18 for those units shows an average of fewer than 1 brown bear per RY was harvested over bait. There is no sealing or harvest ticket requirement for black bears in unit 21C, but with an annual average of 6 black bear sites registered (RY12–RY18) the department believes harvest is low.

The 20-year trend in the harvest data indicated that brown bear harvest in the Galena Area (including Unit 21C) was stable even though bag limits, seasons, and methods were broadened. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the population in the Galena Area was not over-exploited.

DEPARTMENT COMMENTS: The department **SUPPORTS** aspects of this proposal to provide additional hunting opportunity, since it does not cause any biological concerns with brown or black bear harvest in Unit 21C. Based on this harvest history we anticipate that any additional brown and black bear harvest that might occur at bait sites in Unit 21C will not increase harvest to unsustainable levels.

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

PROPOSAL 70 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the season dates for brown bears in Unit 24A.

PROPOSED BY: Jonah Stewart, Rudy Martinez and Nicholas Muche

WHAT WOULD THE PROPOSAL DO? This proposal seeks to extend the season date for brown bears in Unit 24A from August 10–June 30 to July 25–June 30.

WHAT ARE THE CURRENT REGULATIONS?

Dalton Highway Corridor Management Area: Units 20, 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area. The area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the DHCMA is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only. Small game may also be taken by falconry. Aircraft and boats may be used to transport hunters, their gear, or parts of game within the DHCMA. A snowmachine may be used to transport hunters, their hunting gear, or parts of game across the management area from land outside the management area to access land on the other side of the management area. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game, within the DHCMA, EXCEPT licensed highway vehicles may be used on the following designated roads: 1) Dalton Highway; 2) Bettles Winter Trail during periods when BLM and the City of Bettles announce that the trail is open to winter travel; 3) Galbraith Lake road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open; 4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility; 5) The Sagavanirktok River access road two miles north of Pump Station 2; 6) any constructed roadway or gravel pit within 1/4 mile of the Dalton Highway. Any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the DHCMA.

Brown bear regulations in Unit 24A and adjacent areas are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Nonresident hunters must be accompanied by a guide or resident relative within second-degree kindred age 19 or older who possesses a valid Alaska hunting license.
- There is a positive C&T finding for brown bears in Units 23, 24, and 26 combined, with an ANS of 25–35 bears combined.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	24A, 24B	One bear <ul style="list-style-type: none"> • Hide and skull salvage required • Sealing required within 30 days of kill 	Aug 10–June 30

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Residents Only	24	One bear by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> • Meat salvage REQUIRED for human consumption • Permit must be obtained in advance • Hide and skull salvage NOT required • Sealing not required, unless removed from subsistence area or tanned. • If sealed, the skin of the head & front claws are removed & kept by ADF&G. • No aircraft use allowed. • Subject to Failure to Report penalties. 	Aug 10–June 30
Both residents & nonresidents	25A	One bear <ul style="list-style-type: none"> • Hide and skull salvage required • Sealing required within 30 days of kill • Spring baiting allowed April 15–June 30 • Same day airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane 	July 25–June 30

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would extend the brown bear season in Unit 24A by adding 17 days of additional harvest opportunity. This proposal would align season dates with Unit 25A (adjacent unit to the east) but would misalign season dates with Unit 24B (adjacent unit to the west). Sheep hunters would benefit by being able to hunt brown bears prior to the start of sheep season, which is August 10. If adopted, the regular season, which is open to residents and nonresidents, would begin 17 days before the resident RB601 hunt season.

BACKGROUND Additional brown bear harvest opportunity is sustainable in Unit 24A, however, Unit 24A is easily accessed by the Dalton Highway and has the highest reported brown bear harvest for all of Unit 24. The average reported annual harvest of brown bears in Unit 24A during Regulatory Year 2012 (RY12, i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18, was 11 bears. For all of Unit 24, the average reported annual harvest was 17 bears. Based on the estimated sustainable harvest rate of 5–6% in Unit 24, a minimum annual harvest of 39–56 bears can be sustained for all of Unit 24. The department estimated a population of 450 bears in northern Unit 24 (north of Allakaket) and 320–480 in the remainder of the unit (south of Allakaket), based on extrapolated densities of similar habitats from other surveys.

The 20-year trend in the harvest data indicated that harvest in the Galena Area (including Unit 24A) was stable even though bag limits, seasons, and methods were liberalized. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the population in the Galena Area was not overexploited.

DEPARTMENT COMMENTS: The department **SUPPORTS** expanded seasons, since additional harvest opportunity exists. The department has no biological concerns with current brown bear harvest in Unit 24A. However, due to the accessibility of the unit, the board may wish to be cautious regarding expanding season dates into July and may wish to consider season dates of August 1–June 30. This would provide 10 additional days of brown bear hunting which will provide an increase in opportunity with reduced concerns about overharvest.

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

PROPOSAL 71 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Establish a brown bear baiting season in Unit 24A.

PROPOSED BY: Adam Owen

WHAT WOULD THE PROPOSAL DO? This proposal seeks to allow the take of brown bears at registered black bear bait stations in Unit 24A.

WHAT ARE THE CURRENT REGULATIONS?

Dalton Highway Corridor Management Area: Units 20, 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the driveable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area. The area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the DHCMA is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only. Small game may also be taken by falconry. Aircraft and boats may be used to transport hunters, their gear, or parts of game within the DHCMA. A snowmachine may be used to transport hunters, their hunting gear, or parts of game across the management area from land outside the management area to access land on the other side of the management area. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game, within the DHCMA, EXCEPT licensed highway vehicles may be used on the following designated roads: 1) Dalton Highway; 2) Bettles Winter Trail during periods when BLM and the City of Bettles announce that the trail is open to winter travel; 3) Galbraith Lake road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open; 4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility; 5) The Sagavanirktok River access road two miles north of Pump Station 2; 6) any constructed roadway or gravel pit within 1/4 mile of the Dalton Highway. Any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the DHCMA.

Brown bear regulations in Unit 24A and adjacent areas are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed

- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Nonresident hunters must be accompanied by a guide or resident relative within second-degree kindred age 19 or older who possesses a valid Alaska hunting license.
- There is a positive C&T finding for brown bears in Units 23, 24, and 26 combined, and an ANS of 25–35 bears in Units 23, 24 and 26 combined. Units 21 and 22 combined have a positive C&T finding for brown bears, with a combined ANS of 20-25. Unit 25 has a negative C&T finding for brown bears.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	24A, 24B	One bear <ul style="list-style-type: none"> • Hide and skull salvage required • Sealing required within 30 days of kill 	Aug 10–June 30
Both residents & nonresidents	21C, 25A	One bear <ul style="list-style-type: none"> • Hide and skull salvage required • Sealing required within 30 days of kill • Spring baiting allowed April 15–June 30 • Same-day-airborne hunting at bait stations is permitted, if hunter is at least 300 feet from the airplane 	Aug 10–June 30
Both residents & nonresidents	21D, 24C, 24D	One bear <ul style="list-style-type: none"> • Hide and skull salvage required • Sealing required within 30 days of kill • Spring <u>and fall</u> baiting allowed (August 1–September 30 and April 15–June 30) • Same day airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane 	Aug 10–June 30

Black bear regulations in Unit 24A and adjacent areas are as follows:

- No resident locking-tag required.
- Sealing not required
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- There are positive C&T findings for black bears in Unit 21 and in Unit 24 with no established ANS for either unit.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21C, 24	Three bears <ul style="list-style-type: none"> • Meat salvage required (January 1– May 31) • Meat or hide (with claws attached) salvage required (June 1– December 31) • No sealing requirement • Spring baiting allowed April 15–June 30 	No closed season
Both residents & nonresidents	21D, 24C, and 24D	Three bears <ul style="list-style-type: none"> • Meat salvage required (January 1– May 31) • Meat or hide (with claws attached) salvage required (June 1– December 31) • No sealing requirement • Spring <u>and fall</u> baiting allowed (August 1– September 30 and April 15–June 30) 	No closed season

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Harvest of brown bears at registered bear bait stations in Unit 24A would be allowed during the spring black bear baiting season. This may result in minimal increased harvest.

BACKGROUND: The board first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014, and Unit 21C in 2017. Since 2012, there has been an annual average of 26 black bear bait stations registered in these units combined. The reported annual harvest from Regulatory Year 2012 (RY12; i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18 for those units shows an average of fewer than 1 brown bear per year was harvested over bait. In all of Unit 24 during that time, the average annual reported harvest was 17 brown bears/year. Based on our estimated minimum sustainable harvest rate of 5–6% in Unit 24, a minimum annual harvest of 39–56 bears can be sustained for all of Unit 24.

Unit 24A is accessible by the Dalton Highway and 33% of the unit (1,395.42 mi²) is within the DHCMA. There are no sealing or harvest ticket requirements for black bears in Unit 24A, but with an annual average of 4 black bear bait sites registered (RY12–RY18) harvest is expected to be low.

The 20-year trend in the harvest data indicated that brown bear harvest in the Galena Area (including Unit 24A) was stable even though bag limits, seasons, and methods were broadened. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the population in the Galena Area was not overexploited. The department estimates a population of 450 bears in northern Unit 24 (north of Allakaket) and 320–480 in the remainder of the unit (south of Allakaket), based on extrapolated densities of similar habitats from other surveys.

DEPARTMENT COMMENTS: The department **SUPPORTS** aspects of this proposal to provide additional hunting opportunity, since it does not cause any biological concerns with brown bear harvest in Unit 24A. Based on this harvest history the department anticipates that any additional brown bear harvest that might occur at bait sites in Unit 24A will not increase harvest to unsustainable levels.

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

PROPOSAL73 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Eliminate the RB601 subsistence brown bear permit for Units 21D, 24A, 24B, 24C, 24D.

PROPOSED BY: Jack Reakoff

WHAT WOULD THE PROPOSAL DO? This proposal seeks to eliminate the RB601 subsistence brown bear permit.

WHAT ARE THE CURRENT REGULATIONS?

Brown bear regulations in Units 21D, 24A, 24B, 24C, 24D are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21D	One bear <ul style="list-style-type: none"> • <i>Hide and skull salvage required</i> • <i>Sealing required within 30 days of kill.</i> • <i>Spring and fall baiting allowed.</i> 	Aug 10-June 30
Residents	21D, 24A, 24B, 24C, 24D	One bear by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> • <i>Meat salvage REQUIRED for human consumption</i> • <i>Permit must be obtained in advance</i> • <i>Hide and skull salvage NOT required</i> • <i>Sealing not required, unless removed from subsistence area or tanned.</i> • <i>If sealed, the skin of the head & front claws are removed & kept by ADF&G.</i> • <i>No aircraft use allowed.</i> • <i>Subject to Failure to Report penalties.</i> 	Aug 10-June 30

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	24A, 24B	One bear <ul style="list-style-type: none"> • <i>Hide and skull salvage required</i> • <i>Sealing required within 30 days of kill.</i> 	Aug 10-June 30
Both residents & nonresidents	24C, 24D	One bear <ul style="list-style-type: none"> • <i>Hide and skull salvage required</i> • <i>Sealing required within 30 days of kill.</i> • <i>Spring <u>and</u> fall baiting allowed.</i> 	Aug 10-June 30

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5AAC 99.025 Customary and traditional uses of game populations.

The board has made a positive C&T finding for brown bears in Units 21 and 23 combined, with a combined ANS of 20–25 bears. The board has also made a positive C&T finding for brown bears in Units 23, 24, and 26 combined, with a combined ANS of 25–35.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The RB601 subsistence permit in Units 21D and 24 would be eliminated and would remain in Units 19A and 19B. The Unit 21D and 24 regulations would no longer reflect customary and traditional uses previously recognized by the board. Brown bear hunters previously participating under RB601 will have to have their bear sealed, even if it does not leave the unit or is not commercially tanned, which may come at a cost to private parties to participate in this hunt. Hunters previously participating would also have to salvage the skull, which may be contrary to customary and traditional uses. Allowing aircraft transport may increase hunter effort by an unknown amount.

BACKGROUND: The RB601 subsistence brown bear permit is no longer utilized by residents of Units 21D and 24, and some hunters have expressed confusion by the regulation. The elimination of this permit would not affect season dates. In accordance with customary and traditional uses, subsistence hunters are required to salvage the meat; meat cannot be used for trapping bait; no tag is required (both subsistence and general season hunts); and salvage of the hide or skull is not required. If the hide is salvaged and removed from the unit or commercially tanned it must be sealed, and at that time the skin of the head and front claws will be removed and kept by the department. The use of aircraft is prohibited for subsistence hunts. Under the other brown bear hunt, the hunter can choose whether they want to salvage the meat and the hunter does not have to obtain the permit in advance. The Department has provided broad flexibility for sealing hides for all hunters in order to accommodate limited access to sealers in rural communities. In order to make sure bear sealing was convenient, the Galena area biologist has traveled to remote villages, had hides shipped to him (freight collect), had local sealers do the sealing, or sent temporary sealing forms to the hunter.

Brown Bear Regulation	Required for Other Brown Bear Hunts	Required for RB601
Sealing	Yes	No (unless hide and/or skull are taken from the unit or commercially tanned)
Hide salvage	Yes	No (unless sealed)
Skull salvage	Yes	No (unless sealed)
Meat salvage	No (unless baited)	Yes
Permit	No	Yes
Tag fee	No	No
Trophy destruction	No	Yes (if hide and/or skull are taken from the unit or commercially tanned)
Aircraft transport allowed	Yes	No
Season	Aug 10–June 30	Aug 10–June 30
Bag limit	1 bear per regulatory year	1 bear per regulatory year

The RB601 subsistence brown bear permit is seldom utilized. Only 1 bear was harvested during RY09–RY18 on the RB601 by local residents in Units 21D and 24, and only 5 bears have been harvested on RB601 in those units since its implementation in 2004. Twenty-six bears were harvested under the other hunt by local residents during RY09–RY18. Although 97 RB601 permits were issued during this time, hunters who checked in at the Koyukuk check station often said they misunderstood the requirements of the RB601 regulations as the reason they obtained the permit and they intended to hunt under the other harvest regulations once they understood the conditions of the RB601 permit.

Subsistence implications from the Alaska Supreme Court’s *Morry* case (1992) invalidated 5 AAC 92.012(c) (brown bear tag fee requirement) and 5 AAC 92.165 (bear sealing requirement) as subsistence regulations and resulted in the brown bear tag fee exemption and sealing exemption. In *Morry*, the plaintiff objected to (among other things) the tag and sealing requirement as applied to subsistence hunting for brown bears. The court agreed that the regulation was invalid for subsistence hunts because a) leaving the meat at the kill site is not a subsistence use; it recognized a distinction between subsistence uses and trophy harvest of brown bears, and b) there had been no regulatory process in accordance with the Administrative Procedure Act where a public hearing addressed subsistence uses under the 1986 subsistence law. Based on *Morry* (1992), sealing, salvaging meat, and salvaging hides are customary and traditional use distinctions that should be addressed in any proposal and in the public hearing that would be held when considering adoption of a change in regulation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this issue. The department has no biological concerns with brown bear harvest in Units 21D, 24A, 24B, 24C and 24D. If adopted, the board should determine if the new regulations will continue to provide a reasonable opportunity for success in harvesting and using brown bears for subsistence uses.

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

PROPOSAL 75–5 AAC 92.XXX. Establish a predation control plan in Units 21D and 24.

PROPOSED BY: Darrell Vent, Sr.

WHAT WOULD THE PROPOSAL DO? If the proposal is adopted and the department were directed to do so by the board, the department would conduct a feasibility assessment of the potential effectiveness of implementing a predation control program for wolves and bears in Units 21D and 24 to assess the feasibility of implementing predation control due to land status, social factors, economic factors, and expectations for providing improved moose hunting opportunity in this area. This assessment would be presented to the board at the next Interior and Eastern Arctic Region board meeting in 2022/2023.

WHAT ARE THE CURRENT REGULATIONS?

There are no existing predation control plans in these units.

Intensive Management:

- These units all have positive IM findings for moose, as follows:

	Population	Harvest
	Objective	Objective
21D	7,000–10,000	450–1,000
24A	1,200–1,500	75–125
24B	4,000–4,500	150–250
24C	1,000–1,500	50–125
24D	5,000–6,000	225–425

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department would collect the necessary data and complete a feasibility assessment to determine whether a predation control program to increase the moose population is feasible in this area at this time.

BACKGROUND: The proponent identifies several issues: 1) concern about high numbers of wolf and bears in Units 21D and 24; 2) concern about the ability of local subsistence users to meet their needs for moose; 3) a desire for broader regulations for wolves and bears; 4) a desire for the department to complete a feasibility assessment; and 5) concern of public safety related to predators.

Units 21D and 24 include 38,164 mi² and approximately 65% of the area is federal land. In the area near Huslia, those federal lands are primarily the Koyukuk National Wildlife refuge lands, which are managed by the U.S. Fish and Wildlife Service (USFWS). Predation control has not been allowed on USFWS lands.

Moose densities vary throughout Units 21D and 24, with the highest density of 5–6 moose/mi² in the lower Koyukuk portion of 21D and the lowest density of 0.25 moose/mi² in the Brooks Range portion of Unit 24. Wolf survey data are limited to small portions of this area and bear surveys are not conducted.

Although moose in the lower Koyukuk River drainage portion of Unit 21D declined during the early 2000s, moose in the Kaiyuh Flats portion of 21D increased, therefore the overall population in 21D was stable. Most of Unit 24 has moose densities of 0.25–0.50 moose/mi² and has remained stable within that range. However, moose trend count surveys in Unit 24D indicated fewer total moose than average from 2011 through 2018, due to poor calf recruitment (Figure 75.1). Trend count survey results corroborated concerns by residents of Huslia for Unit 24D.

Harvest by Galena area residents, including harvest in Units 21D and 24, has been stable since 2008 (Figure 75.2). Harvest of moose by local and Huslia residents was also stable during that period. Estimated moose populations and estimated harvest for Unit 21D and 24 are in Table 75.1.

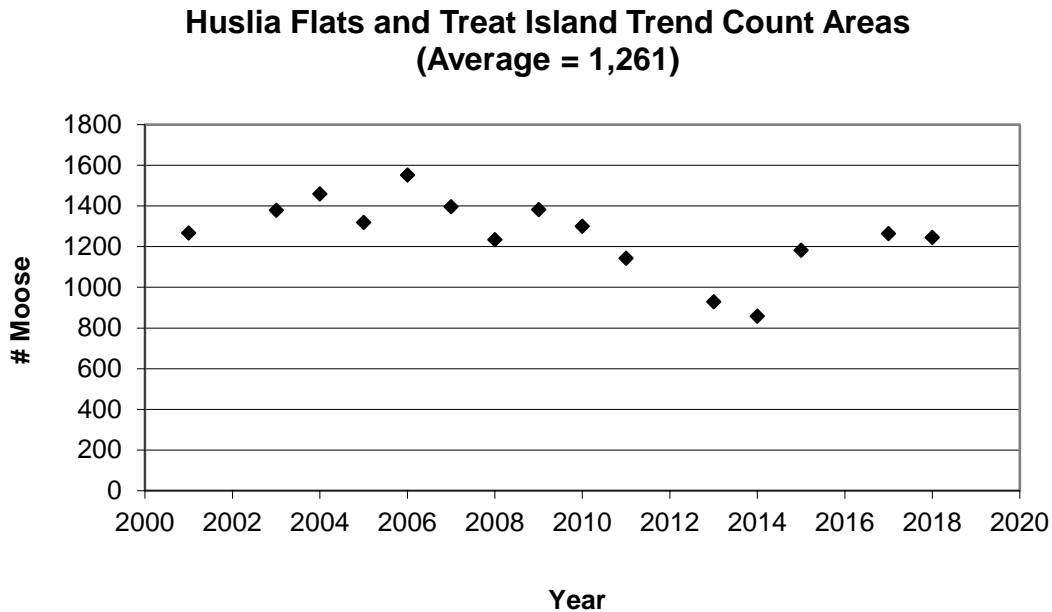


Figure 75.1. Total moose counted for the combined Huslia Flats and Treat Island Trend Count Areas, Regulatory Years 2001 to 2018. A regulatory year is 1 July through 30 June (e.g., RY 2001 is 1 July 2001 through 30 June 2001).

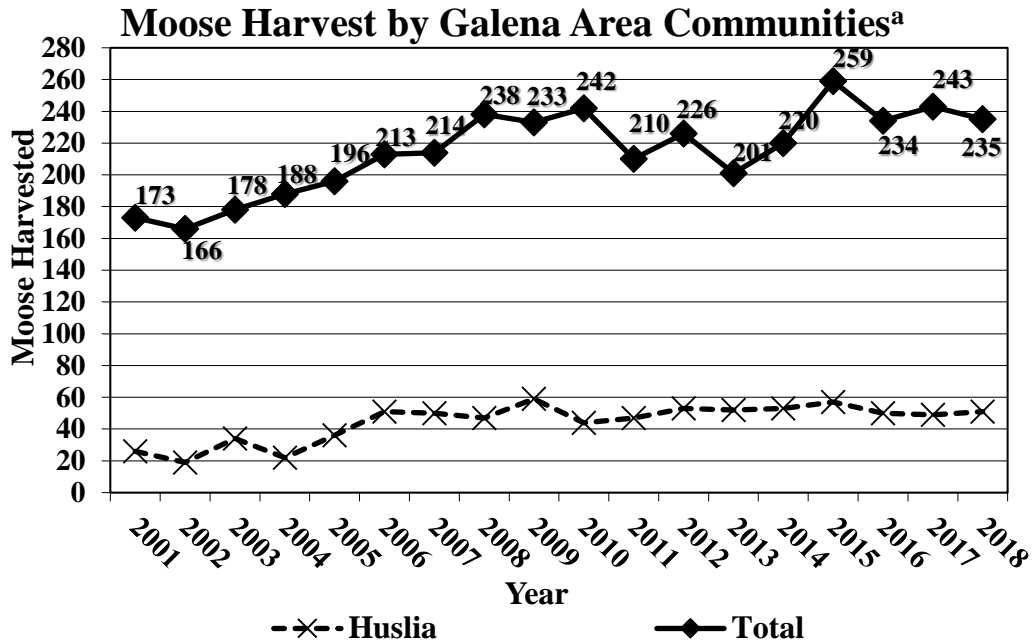


Figure 75.2. Moose harvest by Galena area communities in Units 21B, 21C, 21D, and 24, Regulatory Years^b 2001 to 2018.

^aIncludes the communities of Tanana, Ruby, Galena, Koyukuk, Nulato, Kaltag, Huslia Hughes, Allakaket, Alatna, Bettles, Evansville, Coldfoot, and Wiseman.

^bRegulatory year is 1 July through 30 June (e.g., RY 2001 is 1 July 2001 through 30 June 2001)

Table 75.1. Units 21D and 24 Intensive Management population and harvest objectives (5 AAC 92.108), and current estimated moose population and harvest.

Unit	Moose			
	IM Population objective	Population estimate	IM Harvest objective	Harvest estimate ^a
21D	7,000–10,000	10,478 ($\pm 1,572$)	450–1,000	412
24A	1,200–1,500	3,991 ($\pm 1,101$) ^b	75–125	36
24B	4,000–4,500		150–250	65
24C	1,000–1,500	562 (± 130)	50–125	37
24D	5,000–6,000	4,380 (± 477)	225–425	179

^aHarvest estimate derived from 10-year average reported harvest and estimated unreported harvest.

^bUnits 24A and 24B combined.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because there are no conservation concerns regarding these populations. The proposal describes a large area with varying predator and prey populations, and portions of Unit 24 have current IM plans. The proposal identifies public safety as a component of the IM program request. The department prepares for and conducts IM activities based on ungulate populations that have been found to have high levels of harvest for human consumptive use rather than human/wildlife

conflicts.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department.

PROPOSAL 76 – 5 AAC 92.126. Non-Intensive Management Predator Control Plans.

Establish a predation control plan for caribou in a portion of Units 21B, 21C and 21D to benefit the Galena Mountain caribou herd (GMH) and Wolf Mountain caribou herd (WMH).

PROPOSED BY: Craig Hill.

WHAT WOULD THE PROPOSAL DO? A predation control plan would establish objectives for population recovery of the GMH and WMH caribou herds and establish objectives for wolf, black bear, and grizzly bear population abundance in the range of these caribou herds. The program could consider habitat enhancement alternatives to improve transitional habitat and visual security for cows traveling between calving areas and their summer range.

WHAT ARE THE CURRENT REGULATIONS?

There are no existing predation control plans to benefit caribou in these units.

The GMH and WMH caribou have negative Intensive Management (IM) findings as identified big game prey populations important for providing high levels of human consumptive use. Therefore, these herds do not have IM population and harvest objectives.

The board has made a positive C&T finding for the Galena Mountains and Wolf Mountain caribou herds combined (along with the Ray Mountains herd), and ANS of 150–200 animals for all three herds combined.

The current seasons and bag limits are the following.

5 AAC 85.025	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		
(a)		
...		
(16)		
...		
Unit 21B, that portion north of the Yukon River and downstream from	No open season.	No open season.

Ukawutni Creek

Remainder of Unit 21B 1 caribou	Aug. 10–Sept. 30	Aug. 10–Sept. 30
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Unit 21C, that portion within the Dulbi River drainage and that portion within the Melozitna River Drainage downstream from Big Creek	No open season.	No open season.
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Remainder of Unit 21C 1 caribou	Aug. 10–Sept. 30	Aug. 10–Sept. 30
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Unit 21D, that portion north of the Yukon River and east of the Koyukuk River	(Winter season to be announced)	No open season.
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2 caribou;

Remainder of Unit 21D

RESIDENT HUNTERS:
5 caribou per day; as follows:

up to 5 bulls per day; however, calves may not be taken	July 1–Oct. 14 Feb. 1–June 30
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up to 5 cows per day; however, calves may not be taken	Sept. 1–Mar. 31
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NONRESIDENT HUNTERS:
1 bull; however, calves may not
be taken

Aug. 1–Sept. 30

...

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted and the department were directed to do so by the board, a feasibility assessment of the potential effectiveness of predation control in this area would be initiated. This assessment would include identifying data gaps in the biological understanding of caribou, habitat, and predation in these herds. The department would develop predation control program objectives for caribou, black bear, grizzly bear, and wolf abundance. The department would assess potential response to predation control and the limiting factors of the GMH. This assessment would include habitat factors that may limit the caribou populations, including actions that may improve visual security for escape from predators when caribou transition through valleys separating calving and summer habitats. The department would assess feasibility of implementation due to land status, social factors, economic factors, and expectations for

providing improved hunting opportunity for caribou in this area. The department would develop an experimental protocol to assess the response to management activities implemented. The department would develop a budget for completing the program and then assess funding priorities. If feasible and approved by the board, the department would implement a predation control or habitat improvement program when funded.

BACKGROUND: This proposal addresses the conservation concern regarding population sustainability of the GMH, and, to a lesser extent, the sustainability of the WMH. Although calf production in both herds can be high, calf survival is low and population counts have declined. Encroachment of trees and shrubs on the caribou range is a concern because they provide good cover for bears to prey on caribou that must transition through this habitat with their young calves to reach summer range.

Alaska's Constitution requires the department to manage populations on a sustainable basis. The board has identified the GMH and WMH as distinct populations in 5 AAC 92.108 and 5 AAC 99.025. Because the GMH and WMH are not important for providing high levels of harvest for human consumptive uses (5 AAC 92.108), an intensive management plan cannot be considered. However, the proponent is asking for a non-intensive management plan to address this conservation concern, similar to that described in 5 AAC 92.126.

Ridgeline travel corridors once dominated by open alpine tundra are now forested with high shrubs, birch, and spruce. This may affect the ability of caribou to see and avoid predators in this narrow transitional zone. Pregnant cows from the GMH cross the Melozitna River near Galena Mountain to calve in the Kokrines Hills to the east on talus slopes and open ridges above the tree-line. Cows and calves returning west to the summer range transition through the Melozitna River riparian zone and forested uplands. Black and grizzly bears appear to focus on caribou in this zone during spring.

Minimum counts have been conducted for the GMH caribou since 1982. Beginning in the early 1990s, radiocollars were used to locate the herd and improve survey efficiency and population estimation. In the 1990s and early 2000s minimum counts were as high as 313 caribou during post-calving aggregation surveys. Large numbers of mature bulls were not typically in these groups and small groups were likely missed; therefore, the herd was estimated at 300–500 caribou. Minimum counts conducted since 2002 have remained below 150 animals, except in 2012 when 162 caribou were counted (including a high number of calves); therefore, the abundance is currently estimated at fewer than 150 caribou.

The estimated population size of the GMH has been fewer than 150 caribou since 1999 but the range historically supported more than 350 caribou. Due to low abundance, the hunting season for the GMH has been closed since regulatory year 2004 (RY04; i.e., RY04 = July 1, 2004 through June 30, 2005), with no reported harvest. The estimated population size for the WMH is 450–650 caribou. A somewhat higher count (684) of the WMH in 2019 included large numbers of calves, but calf survival in 2019 remains to be quantified. Hunting is open in the WMH range due to this higher, relatively stable population. Reported harvest in the WMH has averaged 1.4 caribou/year since RY09.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because of the negative Intensive Management finding for these herds. Should the board adopt this proposal, the department will conduct a feasibility assessment and report back to the board at a later date. The department has concerns about the sustainability of these populations.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department.

PROPOSAL 78 – 5AAC 92.010 (g). Harvest tickets and reports. Eliminate the registration caribou permit RC907 and the general season caribou harvest ticket requirement for North Slope residents (Point Hope, Anaktuvuk Pass, residents of Unit 26) in portions of Unit 23 and 24B, and in all of Unit 26A, 26B, and 26C.

PROPOSED BY: North Slope Fish & Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Proposal 78 would eliminate the requirement for North Slope residents to obtain caribou harvest tickets to hunt caribou and report their harvest in a portion of Unit 24B, Unit 26B, and Unit 26C. Regulations associated with RC907 will be addressed at the Region V board meeting under Proposal 28.

WHAT ARE THE CURRENT REGULATIONS?

5AAC 92.010(g). Harvest tickets and reports. For caribou, a person may not hunt caribou, except in a permit hunt, unless the person has in possession a harvest ticket and has obtained a harvest report (issued with the harvest ticket).

There are 4 caribou herds that range through Units 24B, 26B and 26C. The board has found positive C&T use determinations for the Western Arctic herd, the Teshekpuk herd, the Porcupine herd, and the Central Arctic herd. ANSs are 8,000–12,000 Western Arctic and Teshekpuk combined), 1,250–1,550, and 250–450 caribou, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposal would eliminate the requirement for North Slope residents to obtain caribou harvest tickets to hunt caribou and report their harvest in a portion of Unit 24B, Unit 26B, and Unit 26C. Harvest Tickets are used by the department to inform management decisions which allow biologists to manage wildlife populations on sustained yield principles. Lack of harvest data represents a challenge to the management of caribou in Units 24B, 26B, and 26C.

BACKGROUND: North slope communities hunting these subunits include Anaktuvuk Pass, Utqiagvik, Nuiqsut, and Kaktovik. Prior to the requirement of caribou harvest tickets in regulatory year 2016, all hunters living and hunting caribou north of the Yukon River drainage were required to register with Alaska Department of Fish and Game (ADF&G) or an authorized representative. This requirement did not include mandatory reporting and provided minimal harvest information.

Accurate harvest estimates are a critical component of sustainable management across the wide range of the Central Arctic and Porcupine caribou herds. The adoption of a harvest ticket with mandatory reporting requirements was a step toward collecting the harvest information needed for caribou management. It is important to acknowledge that new reporting requirements usually take many years to show robust success as hunt participants learn the new system. In addition, the department is improving its outreach and education efforts with the introduction to the use of this new harvest reporting system.

Efforts by the Division of Subsistence, local entities such as the North Slope Borough, and contracted data collection funded by various agencies and industry have contributed to an important body of historical data regarding caribou harvest. However, currently these data do not provide comprehensive depictions of annual harvest needed for responsive management, which is necessary when attempting to allocate limited resources, prevent overharvest, and maximize hunting opportunity. The new mandatory reporting system is designed to improve data collection efforts.

The Central Arctic caribou herd (CAH) declined substantially in 2016 which resulted in more restrictive hunting regulations beginning RY2017. Obtaining comprehensive harvest data and managing harvest for this herd is critical because the herd has remained stable since 2016, and the department seeks to prevent overharvest, maximize hunting opportunity, and allow some growth in the herd. Harvest data are essential to the department's ability to manage for all 3 of these purposes. Currently the Porcupine caribou herd population size is large. It is important to maximize hunting opportunity when populations are high and to prevent overharvest if the population declines and harvest data provides the information necessary to manage responsibly.

Regulations associated with the WAH and TCH (Unit 26A and a portion of Unit 23) are also potentially affected by this proposal and will be addressed at the Region V Board of Game meeting.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the mechanism used to collect timely harvest data, and residency requirements of the proposal. The department is **OPPOSED** to eliminating the only existing regulatory means to generate timely harvest data because of biological concerns. The department is interested in working with local users to develop a system that achieves this goal. Caribou harvest information is crucial to sound management of caribou to ensure sustained harvest is maintained.

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

PROPOSAL 82 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. and 5 AAC 92.530(X). Management areas. Establish the Arctic Village Sheep Management Area (AVSMA) in Unit 25A, open a new resident and nonresident drawing hunt for sheep within the management area, and change the bag limit for registration permit RS595.

PROPOSED BY: Eastern Interior Alaska Subsistence Regional Advisory Council

WHAT WOULD THE PROPOSAL DO? Create the Arctic Village Sheep Management Area (AVSMA, already defined by federal regulation) in state regulation, create a drawing permit hunt and modify the youth hunt within the management area, and change the bag limit for RS595 in the management area and east of the Middle Fork Chandalar in Unit 25A.

WHAT ARE THE CURRENT REGULATIONS? There is no management area in this portion of the state under state regulations. The AVSMA is defined in federal regulation as: the area bounded on the east by the East Fork Chandalar River beginning at the confluence of Red Sheep Creek and proceeding downstream to the confluence with Crow Nest Creek; continuing up Crow Nest Creek, through Portage Lake, to its confluence with the Junjik River; then down the Junjik River past Timber Lake and a larger tributary, to a major unnamed tributary, northwesterly, for approximately 6 miles where the stream forks into two roughly equal drainages; the boundary follows the easternmost fork, proceeding almost due north to the headwaters and intersects the Continental Divide; the boundary then follows the Continental Divide easterly, through Carter Pass; then easterly and northeasterly approximately 62 miles along the divide to the head waters of the most northerly tributary of Red Sheep Creek; then follows southerly along the divide designating the eastern extreme of the Red Sheep Creek drainage; and then to the confluence of Red Sheep Creek and the East Fork Chandalar (see map). By federal regulation, the AVSMA is closed to sheep hunting except for federally qualified subsistence hunters of Arctic Village, Chalkyitsik, Fort Yukon, Kaktovik, and Venetie.

The RS595 Tier I subsistence hunt area includes all of Unit 26C and that portion of Unit 25A east of the Middle Fork Chandalar River (see map in Fig. 82.1). The hunt is open to residents only during Oct. 1–Apr. 30 with a bag limit of 3 sheep. The use of aircraft for access to hunt sheep and to transport harvested sheep is prohibited except into and out of Arctic Village and Kaktovik airports. There is no motorized access from the Dalton Highway.

All of Unit 25A has a resident and nonresident general season full curl season during Aug. 10–Sept. 20 and a youth full curl season during Aug. 1–5. Nonresidents may only harvest 1 ram every 4 years. Units 23, 24, 25A and 26 have a positive C&T finding for sheep and a combined ANS of 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would change the hunt structure by allocating hunting opportunity between several user groups under state regulation. The AVSMA would be created in state regulation along with a youth hunt; a drawing permit hunt for residents and nonresidents; and would change the existing bag limit for sheep taken under the RS595 hunt within the AVSMA and that portion of Unit 25A east of the Middle Fork Chandalar River (see table below for proposed regulatory changes:

Unit 25A – Sheep, proposed changes				
Resident	East of Middle Fork of Chandalar River, <u>excluding the Arctic Village Sheep Management Area</u>	One ram with full-curl horn or larger. Youth hunt only	HT	Aug 1–Aug 5
Resident		One ram with full-curl horn or larger.	HT	Aug 10–Sept 20
Resident		[THREE SHEEP] <u>One ram with full-curl horn or larger</u> by permit.	RS595	Oct 1–Apr 30
Nonresident		One ram with full-curl horn or larger every 4 regulatory years.	HT	Aug 10–Sept 20
<u>Resident</u>	<u>Arctic Village Sheep Management Area</u>	<u>One ram with full-curl horn or larger. Youth hunt only.</u>	HT	Aug 1–Aug 5
<u>Resident</u>		<u>One ram with full-curl horn or larger every 4 regulatory years by permit.</u>	<u>DSXX</u> <u>X</u>	<u>Aug 10–Sept 20</u>
<u>Resident</u>		<u>One ram with full-curl horn or larger every 4 regulatory years by permit.</u>	<u>RS595</u>	<u>Oct 1–Apr 30</u>
<u>Non-resident</u>		<u>One ram with full-curl horn or larger every 4 regulatory years by permit.</u>	<u>DSXX</u> <u>X</u>	<u>Aug 10–Sept 20</u>

BACKGROUND: The AVSMA was first created in 1991 by the Federal Subsistence Board (FSB) which closed the area to sheep hunting except by federally qualified subsistence hunters. The FSB expanded the AVSMA to include the drainages of Cane Creek and Red Sheep Creek in 1995. The Federal closure was rescinded for Cane Creek and Red Sheep Creek during 2006–2011 and then reenacted in 2012 and has remained that way since.

The U.S. Fish and Wildlife Service (USFWS) Office of Subsistence Management reports that a total of 33 federal permits were issued to local subsistence hunters for the AVSMA during 1995–2017 (average = 1.4 per year). A total of 8 sheep were harvested (average = 0.3 per year) by 14 hunters (average = 0.6 per year) during this period. Additional harvest may have occurred by hunters who either did not obtain a federal permit or did not report.

During 2006–2011, the Cane Creek and Red Sheep Creek portion of the AVSMA was open to a state managed full-curl general season. During that period, a total of 40 hunters (average = 6.7 per year) harvested 27 sheep (average = 4.5 per year) from the Uniform Coding Unit (UCU; the geographic area within a unit to which harvest is assigned based on the kill location description from harvest reports) 25A-Y03-0507 that encompass Cane Creek and Red Sheep Creek (see map). Some of this harvest likely occurred outside Cane Creek and Red Sheep Creek since this UCU also includes an area northeast of those drainages (see map).

The hunt area for state Tier I subsistence hunt RS595 includes all of Unit 26C and that portion of Unit 25A east of the Middle Fork Chandalar River (see map). Since 2009, an average of 11

RS595 permits have been issued per year (range = 6–16). Of those, an average of 4 hunters (range = 1–8), harvested 3 sheep (range = 0–7), annually. Of the sheep harvested, 93% were rams with an average age of 8.1 years (range = 3–11). Almost all harvest occurs in Unit 26C (96%) with 100% of the harvest occurring in March or April by snowmachine.

The last surveys of the AVSMA were conducted by the USFWS in 2012 and 2015. Results of those surveys were sheep density estimates of 0.79 and 0.67 sheep/mi², respectively. In 2016, a survey conducted by the USFWS of the Hulahula drainage and the AVSMA, combined, resulted in a sheep density estimate of 0.86 sheep/mi². Surveys conducted by the National Park Service in Gates of the Arctic National Park and Preserve resulted in a sheep density estimate of 0.66 sheep/mi² in 2015 and 0.85 sheep/mi² in the Itkilik Preserve in 2016. A 2018 survey conducted by the department in eastern unit 25A and western unit 24A resulted in a sheep density of 0.86 sheep/mi². Estimated sheep densities in the AVSMA are similar to other areas of the Brooks Range.

Units 23, 24, 25A and 26 have a positive finding for customary and traditional uses of sheep and a combined amount reasonably necessary for subsistence uses of 75–125 sheep. If this proposal is adopted, there would be a reduction in the bag limit for portions of the RS595 hunt area outside the AVSMA, and the board may wish to consider if reasonable opportunity still exists for subsistence uses.

Estimates of sheep abundance for the entire Brooks Range (Units 23, 24, 25A, and 26) as well as other hunt areas within the Brooks Range (RS595) are unknown because surveys at these large spatial scales have never been conducted. However, extrapolation of sheep densities from smaller survey areas throughout the Brooks Range suggest the following abundances:

Area	Density (sheep/mi ²)	Abundance (total sheep)
Units 23, 24, 25A, and 26	0.66–0.86 sheep/mi ²	13,600–19,500 sheep
RS595 hunt area	0.67–0.86 sheep/mi ²	6,200–8,200 sheep
RS595 hunt area (that portion of 25A only)	0.67–0.86 sheep/mi ²	3,700–4,700 sheep
AVSMA	0.67 sheep/mi ²	960 sheep

Based on extrapolated sheep densities for Units 23, 24, 25A, and 26, the upper range of the combined amount reasonably necessary for subsistence uses of 125 sheep represents less than 1% of the population and well within the annual harvestable surplus.

If adopted, proposed changes to the area defined as the AVSMA would not be implemented by the state unless the FSB rescinds the sheep hunting closure to non-federally qualified subsistence users. The FSB will deliberate a proposal to rescind the closure at their April 2020 meeting. The board should also recognize that in 2012 the BOG adopted a proposal that requires persons that hunts sheep within the Red Sheep and Cane Creek drainages within the AVSMA of Unit 25A, must possess proof of completion of a department approved hunter ethics and orientation course,

including land status and trespass information. Because this regulation only applies to a portion of the AVSMA, if the board were to adopt regulations within the entirety of the AVSMA, the department requests that the board determine whether the ethics and orientation course should apply to all of the AVSMA, just that portion within the Cane Creek and Red Sheep Creek drainages, or if the requirement should be modified or eliminated entirely.

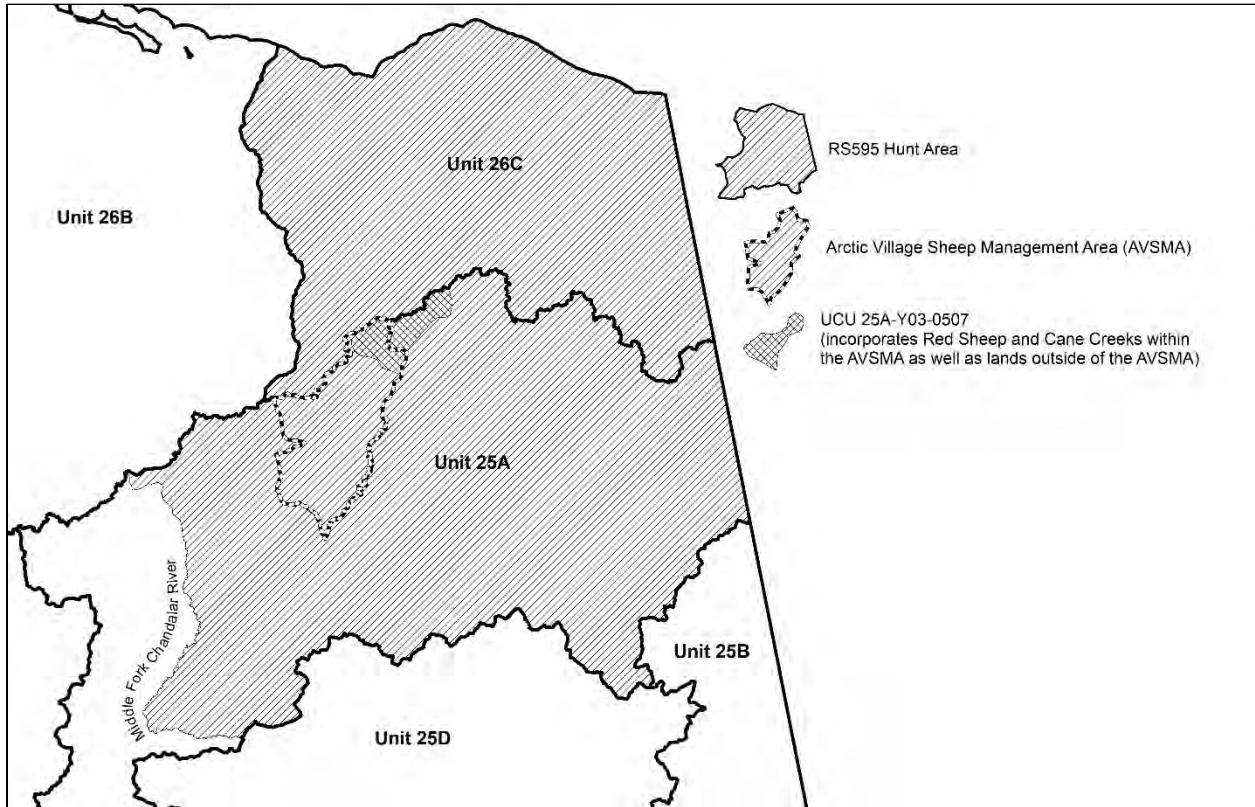


Figure 82.1. RS595 hunt area and proposed AVSMA.

The authors of the proposal state that “the Council views this as a placeholder proposal and will further discuss this proposal at their fall 2019 meeting and will submit additional comments to the Alaska Board of Game by the February 21, 2020, deadline.” As such, the department’s analyses and recommendations only reflect the proposal written in its current state.

DEPARTMENT COMMENTS: The department SUPPORTS this proposal to establish a state hunting season for Dall sheep in the Units identified and is neutral on the allocation of permits as described in the proposal. The department has no biological concerns associated with any element of this proposal. Sheep abundance within the AVSMA appears to be similar to other areas of the Brooks Range. Based on full-curl ram bag limits any additional harvest in the AVSMA is unlikely to have any effect on sheep population size. Sheep hunts with a currently-authorized any-sheep bag limit may provide a reasonable opportunity for success in harvesting a sheep for subsistence uses, but may have the potential to reduce population size if the reproductive component (ewes) are overharvested. However, based on long term harvest data for RS595, few sheep are harvested annually and most of the harvest consists of mature rams. Therefore, it is unlikely that sheep populations have been affected by harvest occurring from the

RS595 hunt to date. The board will need to determine if the changes will continue to provide for a reasonable opportunity of success in harvesting sheep for subsistence uses.

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

PROPOSAL 83 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the bag limit for sheep in the RS595 hunt in Unit 26C.

PROPOSED BY: Leonard Jewkes.

WHAT WOULD THE PROPOSAL DO? This proposal would modify the legal bag limit for sheep in a portion of the RS595 subsistence hunt to 3 sheep, where rams must be $\frac{3}{4}$ curl horn or smaller, excluding rams with both horn tips broken in Unit 26C. Ewes of any horn configuration would still be legal.

WHAT ARE THE CURRENT REGULATIONS? RS595 is open to residents only with a bag limit of 3 sheep during October 1–April 30. The hunt area includes all of Unit 26C and that portion of Unit 25A east of the Middle Fork Chandalar River. The use of aircraft for access to hunt sheep and to transport harvested sheep is prohibited except into and out of Arctic Village and Kaktovik airports. No motorized access is allowed from the Dalton Highway.

All of Unit 26C has a resident and nonresident harvest ticket season for 1 full-curl ram during Aug. 10–Sept. 20 and a youth-only season for 1 full-curl ram during August 1–5. Nonresidents may only harvest 1 ram every 4 years.

There is a positive C&T finding for sheep in Units 23, 24, 25A and 26 and a combined ANS of 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Only rams that are $\frac{3}{4}$ curl horn or smaller, excluding rams with both horn tips broken, would be legal for take under RS595; full curl or larger rams will no longer be legal in this hunt. In the future, hunters seeking large rams may not hunt in RS595 as younger (smaller) rams may be harvested which will reduce the number of mature rams attaining full-curl horns.

BACKGROUND: Estimates of sheep abundance for units 26C and 25A, or for the RS595 hunt area are unknown because surveys at these large spatial scales have never been conducted. However, in 2015, the U.S. Fish and Wildlife Service (USFWS) conducted a sheep survey in a small portion of Unit 25A that resulted in a sheep density estimate of 0.67 sheep/mi². In 2016, the USFWS conducted a survey in a portion of 26C and 25A, combined, which resulted in a sheep density estimate of 0.86 sheep/mi². Extrapolation of sheep densities from these two surveys suggest that sheep abundance is about 3,500 sheep in Unit 26C and 6,200–8,200 sheep in the RS595 hunt area (includes all of Unit 26C and that portion of 25A east of the Middle Fork Chandalar River).

Since 2009, an average of 11 RS595 permits are issued per year (range = 6–16). Of those, an average of 4 hunters (range = 1–8) harvested 3 sheep (range = 0–7) annually. Of the sheep harvested, 93% are rams with an average age of 8.1 years (range = 3–11). Almost all harvest occurs in Unit 26C (96%) with 100% of the harvest occurring in March or April by hunters accessing the area by snowmachine.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because it addresses allocation. The department has no biological concerns associated with the current level of harvest that occurs during the RS595 hunt. Based on extrapolated sheep densities across the hunt area, current harvest is well below 1% of the population and within the annual harvestable surplus. If this proposal is adopted as written, it would change the bag limit for a portion of the RS595 hunt area (Unit 26C) while the remainder of the hunt area (Unit 25A, east of the Middle Fork Chandler River) would maintain the current bag limit. Although not a biological concern, the bag limit would be inconsistent across the hunt area and may warrant separate registration permits for each hunt area.

Units 23, 24, 25A and 26 have a positive finding for customary and traditional uses of sheep and a combined amount reasonably necessary for subsistence uses of 75–125 sheep. If this proposal is adopted, there would be a reduction in the bag limit for portions of the RS595 subsistence hunt area, and the Board may wish to consider if reasonable opportunity is still provided for success in harvesting sheep for subsistence uses.

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

PROPOSAL 84 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. Extend the Dall sheep hunting season in the Dalton Highway Corridor Management Area (DHCMA) within Units 24A, 25A, and 26B.

PROPOSED BY: Austin Manelick

WHAT WOULD THE PROPOSAL DO? This proposal would lengthen the Dall sheep hunting season within the DHCMA in Units 24A, 25A, and 26B from August 10–September 20 to August 10–October 5.

WHAT ARE THE CURRENT REGULATIONS? The current Dall sheep hunting season for residents and nonresidents in the DHCMA is during August 10–September 20 and for youth hunters during August 1–5. Nonresidents may only harvest 1 ram every 4 years. The DHMCA extends 5 miles from each side of the Dalton Highway from the Yukon River to the Arctic Ocean, including the Prudhoe Bay Closed Area (PBCA). The area within the PBCA is closed to the taking of big game. The remainder of the DHCMA is open to hunting by bow and arrow only. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game within the DHCMA, except licensed vehicles may be used on the Dalton Highway and other designated roads described in regulation.

There is a positive C&T finding for sheep in Units 23, 24, 25A and 26 (Brooks Range), with an

ANS of 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effect of this proposal would be that residents and nonresidents would be allowed to hunt sheep within the DHCMA until October 5, which would provide 15 days of additional hunting opportunity, compared to the current season length. The department expects additional harvest but no conservation concerns because of the full-curl bag limit.

BACKGROUND: Sheep surveys to estimate abundance or trend information for the DHCMA have never been conducted and sheep abundance in the eastern Brooks Range is unknown. A trend count survey in a portion of eastern Unit 24A and western Unit 25A has been conducted in most years since 2002. Results of those surveys indicate sheep abundance is variable but stable.

Based on full-curl ram bag limits any additional harvest in the DHCMA as a result of a longer full-curl hunt is unlikely to have any effect on sheep population size. Harvest of sheep within the DHCMA is unknown because Uniform Coding Units (the geographic area within a Unit to which harvest is assigned based on the kill location description from harvest reports) do not align with the DHCMA. However, during regulatory years 2008–2018, a total of 1,278 sheep were harvested in Units 24A, 25A, and 26B combined. Sheep harvested by bow and arrow accounted for 3% of the harvest, or 41 sheep. On average, only 4 sheep were harvested by bow and arrow annually across Units 24A, 25A, and 26B combined. Annual harvest of sheep by bow and arrow within the DHCMA is likely fewer than 4.

DEPARTMENT COMMENTS: The department SUPPORTS the additional harvest opportunity but is **NEUTRAL** regarding the allocative aspects of this proposal. There are no biological concerns associated with a longer season because any additional harvest is expected to be minimal and sustainable. In addition, the season extension would close before the breeding season; therefore, no additional disturbance of sheep breeding behavior would be expected.

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

PROPOSAL 85 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open an archery-only registration sheep hunt in the Dalton Highway Corridor Management Area (DHCMA) within Units 24A, 25A, and 26B.

PROPOSED BY: Austin Manelick

WHAT WOULD THE PROPOSAL DO? This proposal would open an archery-only registration hunt during September 20–October 5 or September 25–October 5 within the DHCMA in Units 24A, 25A, and 26B.

WHAT ARE THE CURRENT REGULATIONS? The current Dall sheep hunting season for residents and nonresidents in the DHCMA is August 10–September 20 and for youth

hunters during August 1–5. Nonresidents may only harvest 1 ram every 4 years. The DHMCA extends 5 miles from each side of the Dalton Highway from the Yukon River to the Arctic Ocean, including the Prudhoe Bay Closed Area (PBCA). The PBCA is closed to the taking of big game. The remainder of the DHCMA is open to hunting by bow and arrow only. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game, within the DHCMA, except licensed vehicles may be used on the Dalton Highway and other designated roads described in regulation.

There is a positive C&T finding for sheep in Units 23, 24, 25A and 26 (Brooks Range), with an ANS of 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Residents and nonresidents would be allowed to hunt sheep within the DHCMA until Oct. 5, which would provide either 11 or 15 days (depending on the hunt start date) of additional hunting opportunity. The department expects additional harvest but no conservation concern based on full-curl bag limits.

BACKGROUND: Sheep surveys to estimate abundance or trend for the DHCMA have never been conducted and sheep abundance in the eastern Brooks Range is unknown. A trend count survey in a portion of eastern Unit 24A and western Unit 25A has been conducted in most years since 2002. Results of those surveys indicate sheep abundance is variable but stable.

Based on full-curl ram bag limits any additional harvest in the DHCMA as a result of a longer full-curl hunt is unlikely to have any effect on sheep populations within the DHCMA. Harvest of sheep within the DHCMA is unknown because Uniform Coding Units (the geographic area within a Unit to which harvest is assigned based on the kill location description from harvest reports) do not align with the DHCMA. However, during 2008–2018, a total of 1,278 sheep were harvested in Units 24A, 25A, and 26B combined. Sheep harvested by bow and arrow accounted for 3% of the harvest or 41 sheep. On average, only 4 sheep were harvested by bow and arrow annually across units 24A, 25A, and 26B combined. Annual harvest of sheep by bow and arrow within the DHCMA was likely less than 4.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because it addresses allocation. The department has no biological concerns associated with a longer season because any additional harvest is expected to be minimal and sustainable. In addition, the season extension would close before the breeding season, therefore, no additional disturbance effects on sheep breeding behavior would be expected.

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

PROPOSAL 94– 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 Unit 20D.

WHAT ARE THE CURRENT REGULATIONS? Unit 20D currently has antlerless hunts available by drawing permit only, with fewer than 40 permits available. Current antlerless moose (except a calf or a cow accompanied by a calf) seasons in Unit 20D are as follows:

- Bison Range Youth Moose Hunt (YM792): youth (ages 10 to 17) hunters that are residents or nonresident children of residents; one bull per lifetime, with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side, or one antlerless moose, however a calf or cow accompanied by a calf may not be taken; September 1–30.
- Purple Heart Recipient Hunt (DM795): qualified Purple Heart Recipient, resident and nonresident hunters; one moose every 4 years, however a calf or cow accompanied by a calf may not be taken; September 1–15 within the Delta Junction management Area.
- Southwestern Unit 20D drawing hunt (DM791) excluding the Delta Junction Management Area; resident hunters; one antlerless moose, however a calf or cow accompanied by a calf may not be taken; October 10–16.

In addition to these drawing hunts, registration hunts are retained in the codified regulation for the department to utilize in reducing or maintaining the moose population in some areas of southern Unit 20D by increasing antlerless harvest.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would allow the department to continue to provide the public with opportunity to sustainably harvest antlerless moose.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The goals of Unit 20D antlerless hunts are to make progress toward achieving the board’s intensive management (IM) harvest objective by harvesting cows from this highly productive population and to address concerns about range degradation, reduced nutritional conditions, and reduced reproductive success by slowing the moose population growth. It is important to manage this population for stability and a consistent harvestable surplus, rather than allow large population expansions and contractions, which can cause wide swings in the number of cow moose available for harvest.

These antlerless moose hunts will likely improve or maintain the ability of moose habitat to support the current moose population. Hunting opportunity and harvest could increase, and the additional harvest could contribute to meeting Intensive Management (IM) harvest objectives. Meat hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by having moose densities compatible with their habitat. Delta Junction residents and motorists may benefit from reduced moose–vehicle collisions and moose–human conflicts.

To maintain a healthy and productive moose population, department research (Boertje et al. 2007) indicates that 10-month-old calves should weigh at least 385 pounds and that the population should not be allowed to grow when the 2-year average twinning rate is 11–20%.

Although the department confirmed in 2019 that 10-month-old calves exceeded the minimum weight, the 2-year twinning rate of 11% may be an indication this population is showing signs of nutritional stress. The department will continue to monitor these, and other, density-dependent indices of nutritional condition.

The department intends to adjust the number of antlerless moose permits needed to maintain a healthy moose population in Unit 20D and expects to issue 20–75 drawing permits for antlerless moose in RY20. During RY16–RY18 an average of 29 drawing permits were issued in Unit 20D for which the bag limit included antlerless moose, with an average harvest of 17 females. Registration permits will only be issued in specific areas if additional harvest is necessary to maintain optimal moose densities.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal and has no biological concerns regarding continued antlerless hunts. However, the department does have biological concerns regarding habitat degradation, reduced nutritional condition, and reduced reproductive success if antlerless hunts are eliminated. The Unit 20D moose population has great potential for growth due to the extensive agricultural land, wildland fire footprints, and high predator harvest. If antlerless moose hunts are not reauthorized, the moose population may quickly exceed carrying capacity. These hunts maintain the opportunity to hunt a harvestable surplus of cow moose and help to meet IM harvest objectives.

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

PROPOSAL 107 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a registration winter moose hunt in Unit 21E for resident hunters.

PROPOSED BY: Grayling, Anvik, Shageluk, Holy Cross (GASH) Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would establish a winter moose registration season for resident hunters during February 15–March 15. The bag limit would be any moose except cows with calves and a quota would be established by the department. The permits would be available in the hunt area and online. Aircraft use would remain restricted within the Paradise Controlled Use Area.

WHAT ARE THE CURRENT REGULATIONS?

Unit 21E:

Residents

- One antlered bull
- September 1–25
- Registration permit

Nonresidents Unit 21E:

- One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side

- September 5–25
- Drawing permit

Paradise Controlled Use Area (PCUA) is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, and/or parts of moose; however, this does not apply to the transportation of moose hunters, their hunting gear, and/or parts of moose by aircraft between publicly owned airports within the controlled use area or the transportation into the area of game meat that has been processed for human consumption. The PCUA is bounded by a line beginning at the old village of Paimiut, then north along the west bank of the Yukon River to Paradise, then northwest to the mouth of Stanstrom Creek on the Bonasila River, then northeast to the mouth of the Anvik River, then along the west bank of the Yukon River to the lower end of Eagle Island (approximately 45 miles north of Grayling), then to the mouth of the Iditarod River, then down the east bank of the Innoko River to its confluence with Paimiut Slough then south along the east bank of Paimiut Slough to its mouth and then to the old village of Paimiut.

Unit 21 has a positive C&T finding for moose and an ANS of 600–800 moose.

Unit 21E has a positive Intensive Management (IM) finding for moose with a population objective of 9,000–11,000 and a harvest objective of 550–1,100.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, it would make progress toward meeting the Intensive Management (IM) harvest objective and is intended to slow this population’s growth. antlerless moose would be harvested, which would also help in making progress toward meeting IM harvest objectives, provide additional opportunity, and help to stabilize the moose density.

BACKGROUND: This moose population is beginning to show signs of nutritional stress. Opening a hunt that includes cow harvest would likely stabilize moose densities. The most current survey in 2019 indicated there are 9,777 moose in Unit 21E and a harvestable surplus of 390. Bull-to-cow ratios are high, with 42 bulls per 100 cows in 2018.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 2.1 moose/mi² in 2019. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. The 2-year average twinning rate in the Holy Cross area is 12%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 32%. The current intensive management plan calls for stabilizing the population through harvest when the 2-year average twinning rate is 15–20%. Browse utilization is high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

DEPARTMENT COMMENTS: The department **SUPPORTS** opening a hunt that includes cow harvest to stabilize moose densities but is **NEUTRAL** on the allocative aspects of this proposal. Twinning rates are a strong indicator of the nutritional status of a moose population and as the population has grown in Unit 21E, the twinning rates observed during spring surveys have declined. Browse utilization is high and it is time to stabilize this growing moose population with carefully regulated cow harvest. Additional harvest is available and allowing winter opportunity will spread out hunting pressure and increase harvest.

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

PROPOSAL 108 – 5 AAC 92.052 (5). Discretionary permit hunt conditions and procedures. Establish check stations and require trophy destruction of moose antlers for RM836 in 21E. Institute antler destruction for moose taken with an RM836 permit and establish check stations in specific communities in the Yukon River drainage.

PROPOSED BY: Eugene Paul

WHAT WOULD THE PROPOSAL DO? This proposal would require destruction of antlers from moose harvested under a RM836 permit and establish 4 mandatory check stations in the communities of Grayling, Anvik, Shageluk, and Holy Cross.

WHAT ARE THE CURRENT REGULATIONS?

Unit 21E:

Residents

One antlered bull by registration permit (RM836) during September 1–25

Nonresidents

One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side by drawing permit (DM837/DM839) during September 5–25

In Unit 21E, the moose meat that must be left on the bone when salvaged prior to October 1 are the front quarters, hind quarters, and ribs for both resident and nonresident hunters.

Unit 21E has a positive finding for intensive management (IM), with IM objectives for a population of 9,000–11,000 and harvest of 550–1,100 moose.

There is a positive C&T finding for moose, and an ANS of 600–800 moose for all of Unit 21.

The department has the discretionary authority to require permit holders to stop at check stations before entering and upon leaving the field, for the dissemination of information and for collection of biological samples. The department also has the discretionary authority to nullify the trophy value of animals taken under subsistence permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it would require hunters who harvest a moose under the resident only RM836 registration permit to destroy the trophy value of their antlers by cutting at least one antler in half upon harvest. Hunters passing through Grayling, Anvik, Shageluk, or Holy Cross would present their meat and antlers at established check stations to ensure regulation compliance involving meat care and trophy destruction.

BACKGROUND: The proposed regulation would only impact resident hunters, who must hold a RM836 permit, by requiring permit holders to destroy antlers and check their moose in at one of 4 check stations run by local volunteers or vendors. As written, this proposal would not impact nonresident drawing permit holders. No more than 50 nonresident drawing permits are issued each year in Unit 21E.

The 2019 moose population estimate for all of Unit 21E (7,993 mi²) is 9,777 moose (2.1 moose/mi².) There is a harvestable surplus of approximately 391 moose; an average of 169 moose have been taken under RM836 annually during RY14–RY18; and an average of 23 moose/year were taken by an average of 49 nonresident drawing permit holders. The combined resident and nonresident harvest during RY14–RY18 is 200 moose/year, well below the harvestable surplus and the IM harvest objective of 550–1,100.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because there are no biological concerns regarding the moose population at current harvest levels or densities.

There are no biological samples needed to achieve management goals or to monitor moose populations in Unit 21E. Absent the need to collect biological samples, the department cannot set up mandatory check stations. The proponent mentions an enforcement aspect; however, volunteers have no enforcement authority.

COST ANALYSIS: Adoption of this proposal, mostly concerning the implementation of check stations, would result in additional costs to the department because they cannot be staffed entirely by volunteers.

PROPOSAL 113 – 5AAC 92.003. Hunter education and orientation requirements. This would require nonresident hunters to complete hunter orientation prior to hunting moose in Units 21A and 21E.

PROPOSED BY: Grayling, Anvik, Shageluk, and Holy Cross (GASH) and McGrath Fish and Game Advisory Committees

WHAT WOULD THE PROPOSAL DO? This proposal would require nonresidents who hunt moose in Units 21A and 21E to watch the videos “*Is This Bull Legal?*” and “*Field Care of Big Game*” before hunting in these units unless they are guided or hunting with a family member within the second degree of kindred. There would be no changes to seasons, antler restrictions, or bag limits.

WHAT ARE THE CURRENT REGULATIONS? Current moose hunting regulations are as follows:

Unit 21A

- Residents — One antlered bull by harvest ticket during September 5–25
- Nonresidents — One bull with 50-inch antlers or antlers with 4 or more brow tines on

at least one side with a harvest ticket during September 5–25.

Unit 21E

- Residents — One antlered bull by registration permit (RM836) during September 1–25. Permits available online, from license vendors in Unit 21E, or ADF&G (McGrath and Fairbanks) beginning August 1
- Nonresidents — One bull with 50-inch antlers or antlers with 4 or more brow tines on at least on side by drawing permit (DM837/DM839) during September 5–25.

Paradise Controlled Use Area (PCUA) in southwestern Unit 21A is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, and/or parts of moose; however, this does not apply to the transportation of moose hunters, their hunting gear, and/or parts of moose by aircraft between publicly owned airports within the controlled use area or the transportation into the area of game meat that has been processed for human consumption. The PCUA is bounded by a line beginning at the old village of Paimiut, then north along the west bank of the Yukon River to Paradise, then northwest to the mouth of Stanstrom Creek on the Bonasila River, then northeast to the mouth of the Anvik River, then along the west bank of the Yukon River to the lower end of Eagle Island (approximately 45 miles north of Grayling), then to the mouth of the Iditarod River, then down the east bank of the Innoko River to its confluence with Paimiut Slough then south along the east bank of Paimiut Slough to its mouth and then to the old village of Paimiut.

In Units 21A and 21E, moose meat that must be left on the bone when salvaged prior to October 1, includes the front quarters, hind quarters, and ribs.

There is a positive C&T finding for moose and an ANS finding of 600–800 moose for all of Unit 21.

There are currently no orientation requirements for moose hunters in these units; however, the department has the discretionary authority to require that permit holders watch the videos prior to hunting. The department does not have the authority to impose the requirement on hunters participating in hunts administered with harvest tickets.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would further efforts to reduce waste and spoilage of moose taken by unguided nonresident moose hunter. In addition, this proposal would align the orientation requirements with Unit 19B.

BACKGROUND: A requirement like that found in Unit 19B where nonresident hunter orientation has been required since RY1997 could improve meat care, although the department has no data regarding meat care improvements in Unit 19B. Much of the moose meat harvested by nonresidents in Unit 21E is donated to people in GASH communities, McGrath, and other surrounding communities.

Meeting the nonresident hunter orientation requirement would be accomplished through online videos, a quiz, and certification of completion, and are all obtainable through the internet.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal

because there are no biological concerns regarding moose in these areas. The department is supportive of hunter education.

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

PROPOSAL 114-5 AAC 85.025. Hunting seasons and bag limits. Delete the Unit 19D Remainder winter harvest ticket hunt for one caribou and open an antlerless winter registration hunt for caribou in Units 19D and 21A with a longer season.

PROPOSED BY: McGrath Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would open a winter registration hunt for one antlerless caribou in Units 19D and 21A during November 1–last day of February.

WHAT ARE THE CURRENT REGULATIONS? The current regulations are as follows:

Unit 21A:

Both residents and nonresidents: One bull with a harvest ticket, August 10–September 20.

Unit 19D Within drainages of the Nixon Fork River:

Both residents and nonresidents: One bull with a harvest ticket, August 10–September 20.

Unit 19D Remainder:

Residents: One bull with harvest ticket, August 10–September 20.

OR

One caribou with harvest ticket, November 1–January 31.

Nonresidents: One bull with harvest ticket, August 10–September 20.

The board has made a positive C&T finding for caribou of the Big River and Rainy Pass herds in Units 16B, 19B, 19C, and 19D, with an ANS of 50–70 caribou. The board has made a positive C&T finding for caribou of the Beaver Mountains and Sunshine Mountains herds in Units 19A, 19D, 21A, and 21E, with an ANS of 5. The board has also made a positive C&T finding for caribou of the Tonzona herd in Unit 19 with an ANS of 20–30 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted it would begin an antlerless winter caribou registration hunt in all of Unit 19D and Unit 21A during November 1–last day of February. Although the new regulation would expand the season and hunt area, the antler restriction would limit harvest to mostly bull caribou and nonpregnant cows. The proposal also requests unspecified aircraft restrictions; however, it is the department’s understanding that the intent was to prohibit aircraft use except between public airports. There would be no changes to the fall seasons.

BACKGROUND: The Beaver and Sunshine Mountain caribou herds, estimated at about 1,000 animals combined, provide a majority of the caribou harvest opportunity in Units 19D and 21A.

Average harvest from the Beaver and Sunshine herds during RY2014–RY2018 was about 3 caribou/year (range 0–6). Harvest is generally low due to difficult access in fall and winter.

During winter, a large portion of the Beaver Mountains and Sunshine Mountains caribou are found within the Nixon Fork River drainages in Unit 19D and are easily accessible by snowmachine. This proposal would increase access to these previously restricted areas during the winter months, and open new opportunities in Unit 21A. The proposed hunt creates a longer season to pursue these caribou. Due to the length of the season and new accessibility to areas of caribou occupation, harvest would need to be monitored closely, such as with a registration permit, in season, to ensure overharvest does not occur.

DEPARTMENT COMMENTS: The department **SUPPORTS** additional harvest where possible, however information about these herds is limited. The Beaver Mountains and Sunshine Mountains caribou herds can sustain a very small amount of additional harvest. If adopted, the hunt must be closely monitored to ensure that harvest does not exceed sustainable levels. If this proposal is adopted, the department will implement a short reporting requirement (e.g., report within 24 hours of taking a caribou) and will close the hunt by emergency order authority when the harvest quota is met. The board will also need to clarify exactly what aircraft restrictions should be implemented as part of this new hunt, if this proposal is adopted. If adopted, this will be the first hunt for antlerless caribou, which may result in some confusion for hunters.

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

PROPOSAL 131 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.
Limit the use of off-road vehicles for moose hunting in Unit 20A.

PROPOSED BY: Leroy Sutton.

WHAT WOULD THE PROPOSAL DO? The proposed change would make it illegal to hunt moose on the same day you have operated or were conveyed by an off-road vehicle in Unit 20A.

WHAT ARE THE CURRENT REGULATIONS? There are currently no regulations prohibiting hunting moose on the same day you have operated or were conveyed in an off-road vehicle in Unit 20A.

5 AAC 92.004. Policy for off-road vehicle use for hunting and transporting game

(a) Off-road vehicles are a legitimate method of transporting hunters and game in the state, subject to requirements of federal, state, and local landowners. If the Board of Game, through its public process, finds that off-road vehicle use attributed to hunting activities in a specific area has resulted or is likely to result in one or more of the following conditions, it will, in its discretion, take action to avoid or minimize the conditions:

- (1) soil erosion or compaction, or vegetative changes, significantly affecting important wildlife habitat, including wildlife food sources such as fish and fish streams, or

- wildlife distribution or abundance;
- (2) harvest of a population, sex, or age class significantly affecting condition, abundance, or trophy size relative to area management goals;
 - (3) wildlife disturbance significantly affecting reproductive success, abundance, or condition; movement patterns, distribution, or behavior; or avoidance of important habitats such as mineral licks, birthing sites, wintering habitat, or fish spawning, incubation, and rearing sites, and other wildlife feeding sites and food sources;
 - (4) chronic conflicts with other user groups leading to a decline in the quality of the outdoor experience.

(b) The provisions of (a) of this section do not prevent the board from taking other action that it considers necessary or advisable to adopt or modify off-road vehicle regulations that might affect hunting or the transportation of hunters, hunting gear, or game.

(c) In this section, “off-road vehicle” includes four-wheel drive trucks and automobiles, motorcycles, three- to eight-wheeled all-terrain recreation and utility vehicles, vehicles with two tracks, air-cushioned vehicles, and airboats operated outside of a navigable waterway.

Intensive management (IM) of moose in Unit 20A was adopted by the board because this population is important for providing high levels of harvest for human consumptive uses. The IM population objective is 10,000–15,000 and the harvest objective is 500–900 moose.

The current moose hunts in Unit 20A include a harvest ticket bull hunt with antler restrictions, antlerless drawing and registration hunts, and 8 any-bull drawing hunts (7 in various portions of Unit 20A during September and 1 by muzzleloader during November–December).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposed changes were adopted it would be illegal to hunt moose in Unit 20A on the same day the hunter operated an off-road vehicle or was transported by an off-road vehicle. Hunters would have to wait to hunt moose until after 3:00 am the day after they operated the vehicle or were transported by off-road vehicle. If this proposal is adopted little impact to current harvest levels is anticipated.

BACKGROUND: Motorized vehicle access is allowed in Unit 20A outside of non-motorized areas (Wood River Controlled Use Area and Yanert Controlled Use Area) and is by far the most popular way to hunt moose. Off road vehicles and 4 wheelers accounted for 55% of the transportation methods used to hunt moose in Unit 20A during regulatory years 2014 through 2018. Over the same period, other methods used included highway vehicles (20%), airplanes (11%), snowmachines (6%), horses (3%), and hunted on foot (both at 2%).

The most recent population survey estimate of 12,315 moose was within the IM population objective of 10,000–15,000, and the average harvest of 589 moose during RY14–RY18 was also within the IM harvest objective. The bull-to-cow management objective for Unit 20A (30 bulls to 100 cows) has been maintained.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding the allocative aspects of this proposal. Under the current land access regulations, the department has no biological concerns regarding the moose population in Unit 20A. However, the proposed

change could result in decreased moose harvest. If the harvest falls below the IM harvest objective of 500 moose/year, the department may have to request that the board increase the season length or increase drawing permits in order to meet this objective. ATV use is restricted in some controlled use areas, this proposal provides an interesting concept to treat them similar to aircraft, which allows them to be used to access areas, but not to actually hunt.

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

PROPOSAL 136 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend the nonresident hunting season for moose in Unit 20B Remainder.

PROPOSED BY: Ken Wenger

WHAT WOULD THE PROPOSAL DO? This proposal would lengthen the nonresident moose season from September 5–15 to September 1–15.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20B, that portion of the Salcha River drainage downstream of Goose Creek and upstream and including Butte Creek

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Unit 20B, that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson Highway

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Remainder of Unit 20B

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in this portion of Unit 20B.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would increase the nonresident moose season by 5 days and would likely increase the nonresident harvest.

BACKGROUND: The bull-to-cow ratio has been declining in the accessible portions of Unit 20B since 2015. Unit 20B has a management objective to maintain a bull-to-cow ratio of 30 bulls per 100 cows. The 2017 survey showed 17 bulls per 100 cows, an indication that the harvest of bull moose was likely too high. After providing this information to, and gaining support from the local advisory committees, emergency orders were issued in July 2018 and 2019 to shorten the season dates to improve the bull-to-cow ratio in these portions of Unit 20B; Sept 1-Sept 15 for resident hunters and Sept 5-Sept 15 for nonresident hunters.

Prior to 2011, these portions of Unit 20B had a September 1–15 moose season for residents and a September 5–15 season for nonresidents. In 2011, the board lengthened the season to September 1–20 for residents and September 5–20 for nonresidents as part of a management strategy to decrease the moose population. At the time, this population was above the IM population objective of 12,000–15,000 moose and was likely to exceed habitat capability if measures were not taken to bring the population to a level more appropriate for the available habitat and the harvestable surplus of bulls was high enough at that time to provide more harvest opportunity.

The moose population has decreased to 12,871 moose, which is a more appropriate level for the available habitat. The department has submitted a proposal (Proposal 135) to return the moose season to the pre-2011 dates to alleviate the low bull-to-cow ratio and allow it to return to the objective of 30 bull per 100 cows.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Increased harvest is a conservation concern because the bull-to-cow ratio is already below the objective. Increasing harvest would be counterproductive to efforts to increase the bull-to-cow ratio in Unit 20B. At this time the department is proposing to shorten Unit 20B moose seasons and this proposal would increase the season for nonresidents.

Although the low bull-to-cow ratio in Unit 20B warrants limiting bull harvest to improve that ratio, the board may wish to consider whether extending the length of the nonresident season and offering simultaneous resident and nonresident opportunity reduces reasonable opportunity for subsistence users.

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

PROPOSAL 139 – 5 AAC 5 AAC 85.045. Hunting seasons and bag limits for moose. Allow muzzleloader hunting in addition to the archery hunt in the drainage of the Middle Fork of the Chena River in Unit 20B.

PROPOSED BY: Dane Happ

WHAT WOULD THE PROPOSAL DO? This proposal would change the archery only moose season in a portion of Unit 20B to allow the use of a muzzleloader.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20B, Drainage of the Middle Fork of the Chena River

Residents and Nonresidents

- One bull by bow and arrow only, September 26–30

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in this area.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would likely increase the number of moose harvested during the September 26–30 moose season.

BACKGROUND: This proposal will likely not increase harvest significantly in this remote portion of Unit 20B. The harvest ticket archery-only hunt in the drainage of the Middle Fork of the Chena River has been in place for many years. The hunt exists because there are a low number of participants and harvest is low. During 2014–2018 only 2 moose were reported harvested during this hunt period.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is an allocation issue at this time. It is unknown how the participation would change if this proposal was adopted and harvest from the hunt would have to be monitored to determine if the hunt was sustainable. Due to the remote nature of this area, it is likely that participation would be low and that harvest would be fewer than 5 moose annually.

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

PROPOSAL 140 – 5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Reauthorize antlerless moose hunting seasons in Unit 20B.

WHAT ARE THE CURRENT REGULATIONS? Antlerless moose hunts are available in Unit 20B by drawing, registration, or targeted permit only, as follows:

Creamer’s Field within the Fairbanks Management Area

Residents and nonresidents:

- 1 antlerless moose by drawing permit, by bow and arrow only, up to 150 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, September 1–November 27;
- 1 antlerless moose by muzzleloader by drawing permit, up to 10 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, Dec. 1–January 31.

Remainder of the Fairbanks Management Area

Residents and nonresidents:

- 1 antlerless moose by drawing permit, by bow and arrow only, up to 150 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, September 1–November 27.

Residents only:

- 1 moose by targeted permit by shotgun, crossbow or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Minto Flats Management Area

Residents only:

- 1 antlerless moose by registration permit, October 15–February 28.

Middle Fork of the Chena River drainage

Residents only:

- 1 antlerless moose by drawing permit, up to 300 permits, taking of calves or cows with calves is prohibited, August 15–November 15;
- 1 antlerless moose by registration permit, taking of calves or cows with calves is prohibited, October 1–February 28.

Southeast of the Moose Creek dike within ½ mile each side of the Richardson Highway

Residents only:

- 1 moose by drawing permit, by bow and arrow, crossbow, or muzzleloader, up to 100 permits, September 16–February 28;
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Remainder of Unit 20B

Residents only:

- 1 antlerless moose by drawing permit, by youth hunt only, up to 200 permits, August 5–14;
- 1 antlerless moose by drawing permit, up to 1,500 permits, taking of cows with calves is prohibited, August 15–November 15;
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Hunts for bull moose are also available in Unit 20B. Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about moose hunting seasons in Unit 20B.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B, within the Minto Flats Management Area, with an ANS of 20–40 moose.

There is a positive C&T finding for moose in Unit 20B, outside the boundaries of the Minto Flats Management Area and outside the boundaries of the Fairbanks Nonsubsistence Area, with an ANS of 75–100 moose.

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: Antlerless moose hunting seasons must be reauthorized annually. The department’s goal in Unit 20B 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, provide hunting opportunity, help 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 hunts are not reauthorized, subsistence hunters in the portion of Unit 20B outside the Fairbanks Nonsubsistence Area may not have a reasonable opportunity to pursue moose for subsistence uses. Many different antlerless hunts have been implemented over the last 10 years in Unit 20B. Currently the moose population is estimated to be within the Intensive Management objective of 12,000–15,000 moose, therefore the necessity for antlerless harvest is minimal and fewer hunts are offered at this time. The antlerless hunts that are currently offered are as follows:

Fairbanks Management Area (FMA) – The purposes of these antlerless hunts are to regulate population growth in the urban and suburban Fairbanks area to potentially reduce moose–vehicle collisions and moose–human conflicts.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose–human conflicts continue to place significant demands on property owners. To increase hunting opportunity and harvest and to reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during Regulatory Year 1999 (RY99; that is, RY = 1 July 1999 through 30 June 2000) through RY10. Moose–vehicle collisions and moose–human conflicts declined during RY06–RY19, presumably, in part due to the consistent antlerless moose harvests during RY09–RY19.

Minto Flats Management Area (MFMA) – The primary purposes of this antlerless hunt are 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 showed a more sustainable density (2.6 moose/mi²) in the MFMA. The 2017 estimate now indicates densities are at approximately 1.7 moose/mi². The antlerless harvest in this area is intended to stabilize this population, therefore we intend to only harvest antlerless moose at about 1% of the total population to maintain the current population size.

Targeted Hunts – The purpose of the targeted hunts is primarily to reduce moose–vehicle collisions and moose–human conflict near schools, neighborhoods, and roads by harvesting moose that habitually spend time along roadways and have a high likelihood of being injured by highway vehicles or have already been injured. We also use targeted hunts as an option for resolving moose–human conflict situations. These permits are used sparingly but allow the public to harvest specific moose instead of the department dispatching them.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with the harvest of antlerless moose taken under these regulations in these hunt areas; however, elimination of these hunts would create a biological concern as the population grows beyond capability of its habitat. The board may also wish to consider whether a reasonable opportunity for subsistence uses on populations with positive C&T findings would still be provided if these hunts were eliminated. The Unit 20B moose population has potential for growth due to the extensive burns (i.e., increased productivity) and high survival rates. If antlerless moose hunts are not reauthorized, the moose population may exceed carrying capacity and would require population reduction. These hunts maintain the opportunity to hunt a harvestable surplus of cow moose, and help to meet IM harvest objectives.

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

PROPOSAL 141 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate registration moose permit hunt RM785, in the Minto Flats Management Area (MFMA) in Unit 20B.

PROPOSED BY: Tanana, Rampart, Manley Fish & Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the MFMA.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20B MFMA antlerless moose hunt

Residents only:

- 1 antlerless moose by registration permit (RM785), October 15–Last day of February, unless closed by Emergency Order.

Unit 20B MFMA bull moose hunts

Residents:

- One bull by harvest ticket, August 21–27,
- or
- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side, by harvest ticket, September 8–25

Nonresidents:

- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side by drawing permit, September 8–25. Ten permits are issued.

There is a positive C&T finding for moose in Unit 20B within the Minto Flats Management Area, with an ANS of 20–40 moose.

Unit 20B has a positive finding for intensive management (IM) because the unit is important for providing high levels of harvest for human consumptive use. The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the Minto Flats Management Area, therefore a customary and traditional opportunity to harvest antlerless moose would be lost.

BACKGROUND: The MFMA has consistently held one of the highest densities of moose in Unit 20B. At a density of 2–2.5 moose per square mile, this moose population is at a level appropriate for the current habitat. The harvestable surplus of bull moose in the MFMA area is 100–125, while the harvestable surplus of antlerless moose is 20–30. This is above the ANS of 20–40.

To help stabilize this population at its current density, the department recommends antlerless moose harvest of 1–1.5% of the population. For regulatory year 2019 (RY19; that is, 1 July 2019 through 30 June 2020), the quota for the RM785 antlerless moose hunt is 20 moose. This will help stabilize the moose population so that it does not increase beyond what the habitat can support. The estimated harvestable surplus of antlerless moose during RY16–RY18 was 20–30 moose/year, the approximate harvest during each of those years. This antlerless harvest also contributes to the IM harvest objective for Unit 20B of 600–1,500 moose.

Ceremonial harvest and cultural education harvest in the MFMA is generally low (estimated at 4–5 moose annually). However, during RY18 an increase in this harvest (estimated at 10 moose) combined with antlerless harvest in subsistence permit hunt RM785 (which was also closed by Emergency Order) caused the department to limit ceremonial harvest and cultural education permits to bulls only during 5 December 2018 through 30 June 2019 because the RY18 harvestable surplus of cows had been taken.

In 2010, the density of moose in MFMA was estimated at about 4 moose per square mile. Twinning rates were low and browse removal rates in the area were high which indicates that moose density was too high. By increasing harvest to as much as 130 antlerless moose per year during RY12–RY15, the department reduced the moose population to prevent further density-dependent issues in this area.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it is a reduction in opportunity to harvest an available surplus of moose. Antlerless moose hunts are a valuable tool the department has to reduce or maintain populations, provide subsistence opportunity (especially in a longer winter season), and to meet intensive management harvest levels. Antlerless harvest at current harvest rates, as managed by quota, is minimal and likely does not affect the population. If the population does begin to grow to inappropriate levels, then antlerless moose harvest would be crucial.

The board must provide reasonable opportunity for hunting moose in the MFMA under the requirements of the subsistence statute, unless that provision is inconsistent with sustainable management. Elimination of the RM785 hunt would challenge the department’s ability to manage the moose population at appropriate levels and the board’s ability to provide reasonable opportunity. Additionally, if ANS is consistently not met, the board may choose to evaluate whether reasonable opportunity is being provided through the current hunt structure. If this proposal is adopted, the board may wish to consider whether reasonable opportunity is being provided given that eliminating the registration hunt RM785 would be a reduction in subsistence opportunity.

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

PROPOSAL 142 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate registration moose permit hunt RM785, in the Minto Flats Management Area (MFMA) in Unit 20B.

PROPOSED BY: Anna Frank

WHAT WOULD THE PROPOSAL DO? Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the MFMA.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20B MFMA antlerless moose hunt

Residents only:

- 1 antlerless moose by registration permit (RM785), October 15–Last day of February, unless closed by Emergency Order.

Unit 20B MFMA bull moose hunts

Residents:

- One bull by harvest ticket, August 21–27, or
- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side, by harvest ticket, September 8–25

Nonresidents:

- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side by drawing permit, September 8–25. Ten permits are issued.

Refer to the *2019–2020 Alaska Hunting Regulations* for bull moose hunting seasons in this area.

There is a positive C&T finding for moose in Unit 20B within the MFMA, with an ANS of 20–40 moose.

Unit 20B has a positive finding for intensive management (IM) because the unit is important for providing high levels of harvest for human consumptive use. The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the Minto Flats Management Area, therefore a customary and traditional opportunity to harvest antlerless moose would be lost.

BACKGROUND: The MFMA has consistently held one of the highest densities of moose in Unit 20B. At a density of 2–2.5 moose per square mile, this moose population is at a level appropriate for the current habitat. The harvestable surplus of bull moose in the MFMA area is 100–125, while the harvestable surplus of antlerless moose is 20–30. This is above the ANS) of 20–40.

To help stabilize this population at its current density, the department recommends antlerless moose harvest of 1–1.5% of the population. For regulatory year 2019 (RY19; that is, 1 July 2019 through 30 June 2020), the quota for the RM785 antlerless moose hunt is 20 moose. This will help stabilize the moose population so that it does not increase beyond what the habitat can support. The estimated harvestable surplus of antlerless moose during RY16–RY18 was 20–30 moose/year, the approximate harvest during each of those years. This antlerless harvest also contributes to the IM harvest objective for Unit 20B of 600–1,500 moose.

Ceremonial harvest and cultural education harvest in the MFMA is generally low (estimated at 4–5 moose annually). However, during RY18 an increase in this harvest (estimated at 10 moose) combined with antlerless harvest in subsistence permit hunt RM785 (which was also closed by Emergency Order) caused the department to limit ceremonial harvest and cultural education permits to bulls-only during 5 December 2018 through 30 June 2019 because the RY18 harvestable surplus of cows had been taken.

In 2010, the density of moose in MFMA was estimated at about 4 moose per square mile. Twinning rates were low and browse removal rates in the area were high which indicates that moose density was too high. By increasing harvest to as much as 130 antlerless moose per year

during RY12–RY15, the department reduced the moose population to prevent further density-dependent issues in this area.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it is a reduction in opportunity to harvest an available surplus moose. Antlerless moose hunts are a valuable tool the department has to reduce or maintain populations, provide subsistence opportunity (especially in a longer winter season), and to meet intensive management harvest levels. Antlerless harvest at current harvest rates, as managed by quota, is minimal and likely does not affect the population. If the population does begin to grow to inappropriate levels, then antlerless moose harvest would be crucial.

The board must provide reasonable opportunity for hunting moose in the MFMA under the requirements of the subsistence statute, unless that provision is inconsistent with sustainable management. Elimination of the RM785 hunt would challenge the department’s ability to manage the moose population at appropriate levels and the board’s ability to provide reasonable opportunity. Additionally, if ANS is consistently not met, the board may choose to evaluate whether reasonable opportunity is being provided through the current hunt structure. If this proposal is adopted, the board may wish to consider whether reasonable opportunity is being provided given that eliminating the registration hunt RM785 would be a reduction in subsistence opportunity.

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

PROPOSAL 143 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate all antlerless moose drawing hunts, including antlerless moose drawing hunts for youth, in Unit 20B except for the Minto Flats Management Area (MFMA).

PROPOSED BY: Anna Frank

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would eliminate all drawing permits for antlerless moose in Unit 20B.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20B Drawing Hunts that Include Antlerless Moose in the Bag Limit:

Within the Fairbanks Management Area (DM788 archery only, DM786 archery only, Qualified Disabled Veterans only)

- One antlerless moose
- September 1–November 27
- Both hunts are open to residents and nonresidents

Within the Creamer’s Field Migratory Waterfowl Refuge (DM789)

- One antlerless moose by muzzleloader

- December 1–January 31
- Open to resident and nonresidents

Richardson Highway Corridor (DM783)

- One moose by bow and arrow, crossbow, or muzzleloader
- September 21–Last day of February
- Open to residents only

Unit 20B Target Hunt(AM751)

- One moose as determined by the department
- Announced when available
- Open to residents only

Refer to the *2019–2020 Alaska Hunting Regulations* for additional hunting seasons for bull moose in this portion on Unit 20B.

Unit 20B is identified by the board as being important for providing high levels of harvest for human consumptive use and has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the IM harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would eliminate antlerless moose drawing permit hunts in the Fairbanks Management Area, Creamer’s Field Migratory Waterfowl Refuge, Richardson Highway Corridor, and the Unit 20B target moose registration hunt. None of the other drawing hunts in the proposal are being administered at this time. This proposal would allocate all antlerless moose to ceremonial harvest in Unit 20B.

BACKGROUND: Antlerless moose hunts in Unit 20B help to make progress toward meeting the IM objectives for high levels of human consumptive use, and help to regulate this moose population, which has the ability to quickly outgrow the capability of its habitat. Because hunts currently utilized occur in populated areas, they also enhance public safety by reducing moose–vehicle collisions and moose–human conflicts.

The harvestable surplus of antlerless moose in central and western Unit 20B includes about 80 antlerless moose/year. If all of these antlerless moose are taken, this population will likely remain stable and nutritionally healthy. About 25 antlerless moose will likely be harvested from the MFMA under the registration hunt (RM785), approximately 35 antlerless moose will be harvested from the Fairbanks Management Area and Richardson Highway drawing permits (DM786, DM788, DM789 and DM783) and the remaining harvest (approximately 17 antlerless moose/year) is estimated to come from ceremonial harvest, cultural education permits and unreported harvest.

Only 4 antlerless moose drawing permit hunts are used at this time outside the MFMA. The Fairbanks Management Area and Creamer’s Field Migratory Waterfowl refuge have 3 drawing

permit hunts that will yield an estimated 30–35 antlerless moose annually. These hunts are either archery only or muzzleloader only. Because these moose are harvested in the immediate Fairbanks area, moose–vehicle collisions and moose–human conflicts are reduced. The fourth drawing permit hunt is the Richardson Highway Corridor hunt (DM783). This hunt area includes ½-mile on each side of the Richardson Highway with a bag limit of any moose. The hunt is limited to archery, muzzleloader, and crossbow and is intended to reduce moose–vehicle collisions. The harvest is generally fewer than 10 antlerless moose. The remaining drawing permits listed in this proposal are not being used at this time; however, they are in codified for use if the moose population grows too large for the habitat to support.

In 2009, the population estimate for Unit 20B was approximately 20,000 moose. This was above the IM population objective and biological indicators showed that the moose population was too large for the habitat in this area. Antlerless moose hunts were administered throughout most of central and western Unit 20B to help reduce the population. Drawing permits were used for most of the road system portion of the unit and a registration hunt was used in MFMA. These permits helped reduce the population to a more appropriate level. By 2017, the population was within the IM population objective and at a more appropriate size for the amount of habitat available. As a result, most drawing permits for antlerless moose were eliminated.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The hunt structure in Unit 20B is set up to comply with the Intensive Management finding for the area. Antlerless hunts are used to provide hunting opportunity and to manage the moose population. Currently, only 4 of the 77 drawing permits listed by the proponent are being administered. Those 4 hunts all exist near the city of Fairbanks and are weapons restricted. These hunts provide hunting opportunity while reducing moose–human conflict and moose–vehicle collisions in populated areas. The other 73 drawing permits listed in the proposal have not been administered since 2017. The department would like to continue to keep these hunts available for use in the event the moose population reaches a level in which cow harvest is needed to control population growth.

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

PROPOSAL 144 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Shorten the antlerless moose seasons in Units 20A and 20B.

PROPOSED BY: Leonard Jewkes

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would shorten or eliminate any antlerless moose season that extends beyond or starts after November 30.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20A Antlerless hunts:

Unit 20A

- One antlerless moose by drawing permit (DM628 through DM679)
- August 15–November 15

Western Unit 20A

- One antlerless moose by limited registration permit (RM768, 20 permits)
- October 1–Last day of February

Unit 20A target hunt (AM751)

- One moose, limited registration permit
- Season: determined by ADF&G

Unit 20B Antlerless moose hunts:

Fairbanks Management Area by drawing permit (DM786, DM788)

- One antlerless moose by bow and arrow
- September 1–November 27

Creamer’s Field Migratory Waterfowl Refuge by drawing permit (DM789)

- One antlerless moose by muzzleloader
- December 1–January 31

Richardson Highway Corridor by drawing permit (DM783)

- One moose by bow and arrow, muzzleloader or crossbow
- September 21–Last day of February

Minto Flats Management Area by registration permit (RM785)

- One antlerless moose
- October 15–Last day of February unless closed by emergency order

Unit 20B target hunt (AM751)

- One moose, limited registration permit
- Season: determined by ADF&G

Refer to the *2019–2020 Alaska Hunting Regulations* for bull moose hunting seasons in this area.

Both Units 20A and 20B have positive findings for intensive management (IM) for high levels of consumptive uses of moose. The Unit 20A IM population objective is 10,000–15,000 moose and the IM harvest objective is 500–900 moose. The Unit 20B IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

The portion of Unit 20A outside the boundaries of the Fairbanks Nonsubsistence Area has a positive C&T finding for moose with an ANS of 50–70 moose. The portion of Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Flats Management Area has a positive C&T finding for moose with an ANS of 75–100. There is a positive C&T finding for moose in Unit 20B within the Minto Flats Management Area, with ANS of 20–40 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would shorten or eliminate 4 different antlerless moose hunts in Unit 20A and 20B, including some customary and traditional opportunities.

BACKGROUND: Units 20A and 20B currently have a moose population within the Intensive Management population objectives and the current management strategy is to maintain the current population size. During the last decade, in both Units 20A and 20B we implemented various antlerless moose hunts to reduce moose populations that were too large for the existing habitat. Department personnel worked with local advisory committees and developed hunts that would best suit the public. Hunts spanned from August to as late as March. Currently antlerless moose hunts are being used at low levels in both units and most hunts end prior to November 30. The total harvest of antlerless moose taken after November 30 in both units is low.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it is a reduction in opportunity to harvest moose. No conservation concern would be addressed or created by adoption of this proposal. Antlerless moose hunts are a valuable tool the department has to reduce or maintain populations, provide subsistence opportunity (especially during a longer winter season), and to meet intensive management harvest levels. Antlerless harvest at current harvest rates, as managed by permit hunts, is minimal and likely does not affect the population. If the population does begin to grow to inappropriate levels, then antlerless moose harvest would be crucial. Harvest of antlerless moose after November 30 is low currently. Adoption of this proposal would eliminate some subsistence opportunity and hunting opportunity during the winter months.

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

PROPOSAL 145 – Hunting seasons and bag limits for moose. Modify the nonresident bag limit for moose in Unit 25C.

PROPOSED BY: Jormah Pope

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would change the bag limit for nonresident moose hunters from one bull to one bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side.

WHAT ARE THE CURRENT REGULATIONS?

Unit 25C:

Residents

- One bull, September 1–15

Nonresidents

- One bull, September 5–15

Unit 25C does not have a positive finding for Intensive Management. It does have a positive C&T finding for moose outside the Fairbanks Nonsubsistence Area, and an ANS of 8–15 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would require nonresident hunters to harvest moose with antlers 50 inches wide or with 4 or more brow tines on at least 1 side. Therefore, it is likely that nonresident harvest would decrease in this area.

BACKGROUND: The average total moose harvest during 2014–2018 was 80 bulls per year (an average of 63 by residents and 17 by nonresidents.) A moose survey has not been conducted for many years so we do not have a recent estimate of harvestable surplus. However, historical surveys and anecdotal information suggest that the Unit 25C moose population is similar to many low-density populations. Hunter participation is moderate and lower than in Units 20A, 20B and 20D. The harvest has remained stable for many years, suggesting that harvest levels are not a biological concern for the area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is an allocation issue.

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

PROPOSAL 146 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Allocate up to ten percent of the caribou drawing permits DC827 in Unit 20A to nonresidents.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would allocate up to 10% of the Unit 20A caribou drawing permits (DC827) to nonresidents.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20A Caribou:

Residents and Nonresidents

One Bull by drawing permit (DC827)

August 10–September 20

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would limit nonresidents to no more than 10% of the drawing permits for Unit 20A caribou. At this time 150 permits are issued so nonresidents would be limited to 15 permits.

BACKGROUND: The Delta caribou herd in Unit 20A has an estimated population of 2,000–3,000 caribou. The department issues 150 caribou permits annually and the average total harvest

during 2014–2018 was 54 bull caribou. During 2014–2018, nonresidents averaged drawing 15 permits annually and had an average harvest of 13 caribou. In 2017 and 2018 the number of permits drawn by nonresidents was 22 (15% of all permits) and 27 (18% of all permits) respectively compared to 11 (7%), 9 (6%), and 7 (5%) drawn during 2014, 2015, and 2016, respectively. This hunt is within the Fairbanks Nonsubsistence Area and does not have a positive finding for Intensive Management.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is an allocation issue, and recommends the board examine board finding 2017-222-BOG regarding nonresident hunter allocation as it deliberates the allocation of hunting opportunity to nonresidents.

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

PROPOSAL 147 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the hunting season for brown bear in Units 20A and 20B Remainder

PROPOSED BY: Jeff Lucas

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would add 30 days to the current brown/grizzly bear season in Units 20A and 20B and it would align the end of the brown/grizzly bear season with the end of black bear baiting season on June 30.

WHAT ARE THE CURRENT REGULATIONS?

Unit 20A and remainder of Unit 20B

Resident and nonresident hunters:

- One brown bear every regulatory year, September 1–May 31.
- Cubs and sows with cubs may not be taken.
- Hunting brown bears over bait is legal, April 15–May 31.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing brown bears is required within 30 days of harvest.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

There is a positive C&T finding for brown bears in Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Area, combined with Unit 20C. The ANS is 1–3 brown bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? By extending the brown bear season to June 30, this proposal would align the brown bear baiting season with the black bear baiting season (April 15–June 30) and it would likely increase the number of bears harvested.

BACKGROUND: Brown bear harvest in Unit 20A and Unit 20B remainder is higher than the estimated sustainable harvest. Results of research in the 1980s and 1990s indicate that the estimated annual sustainable harvest of bears ≥ 2 years old was ≤ 12 bears in Unit 20A and ≤ 9 bears in Unit 20B. Average reported harvest during 2014–2018 was 27 bears in Unit 20A and 15 bears in Unit 20B. In Unit 20A, the proportion of females in the harvest was higher (49%) during RY14–RY18 than the recommended 45% or less of the estimated population. No more than 45% females in the harvest is considered to be necessary to sustain a stable population. The department recognizes that the data from the 1980s and 1990s may be outdated or that increases in the population may have occurred since those studies. However, the current harvest has been sustained over many years and the higher percentage of females in the harvest may be linked to a high proportion of young bears in the population. Other indicators (such as moose calf-to-cow ratios) have been consistently high in both Units 20A and 20B, indicating that bear predation is not affecting the moose population. Also, the number of nuisance bears or bears killed in Defense of Life and Property (DLP) is low in both units. These anecdotal indicators suggest that the population may be at an appropriate level for the habitat and the current harvest may be sustainable. The department has concerns regarding the sustainability of additional harvest on this bear population.

Brown bear hunting seasons and bag limits have been broadened over the last decade in Region III through resident tag fee exemptions, increased bag limits, longer seasons, and, in some units (including Units 20A and 20B), allowing the take of brown bears at registered bear bait stations. In the Fairbanks area, the take of brown bears over bait was first allowed in Unit 20C during RY12, followed by Units 20A and 20B in RY14. Most bear hunting seasons in Region III are August 10–June 30, except for easily-accessed and heavily hunted areas, including Unit 20A and central and western portions of Unit 20B (remainder), where the season ends May 31.

There is a high volume of registered bear bait stations in Units 20A and 20B (n=116 and 525, respectively, during RY14–RY18). Harvest of brown bears taken over bait during RY14–RY18 averaged 4 in Unit 20A and 9 in Unit 20B.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because of biological concerns regarding the sustainability of additional harvest on this bear population. The department lacks precise scientific data on the number of bears and harvest rates and recommends a conservative management strategy. Units 20A and 20B have a high density of bear bait stations and extending the brown bear baiting season for 1 month would likely result in a significant increase of brown bear harvest in these units. The risk of substantial increase in harvest is high because of the high volume of bear bait sites registered in the area coupled with extensive access, particularly in central Unit 20B.

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

PROPOSAL 148 – Hunting seasons and bag limits for brown bear. Extend the hunting season for brown bear in Unit 20B Remainder.

PROPOSED BY: Nicholas Muche

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would add 30 days to the current brown/grizzly bear season in Unit 20B and align the end of the brown/grizzly bear season with the end of Black bear baiting season (June 30).

WHAT ARE THE CURRENT REGULATIONS?

Remainder of Unit 20B

Resident and nonresident hunters:

- One brown bear every regulatory year, September 1–May 31.
- Cubs and sows with cubs may not be taken.
- Hunting brown bears over bait is legal, April 15–May 31.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing of hide and skull are required within 30 days of harvest.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? By extending the brown bear season to June 30, this proposal would align the brown bear baiting season with the black bear baiting season (April 15–June 30) and it would likely increase the number of bears harvested.

BACKGROUND: Brown bear harvest in Unit 20A and Unit 20B remainder is higher than the estimated sustainable harvest. Results of research in the 1980s and 1990s indicate that the estimated annual sustainable harvest of bears ≥ 2 years old was ≤ 12 bears in Unit 20A and ≤ 9 bears in Unit 20B. Average reported harvest during 2014–2018 was 27 bears in Unit 20A and 15 bears in Unit 20B. In Unit 20A, the proportion of females in the harvest was higher (49%) during RY14–RY18 than the recommended 45% or less of the estimated population. No more than 45% females in the harvest is considered to be necessary to sustain a stable population. The department recognizes that the data from the 1980s and 1990s may be outdated or that increases in the population may have occurred since those studies. However, the current harvest has been sustained over many years and the higher percentage of females in the harvest may be linked to a high proportion of young bears in the population. Other indicators (such as moose calf-to-cow ratios) have been consistently high in both Units 20A and 20B, indicating that bear predation is not affecting the moose population. Also, the number of nuisance bears or bears killed in Defense of Life and Property (DLP) is low in both units. These anecdotal indicators suggest that the population may be at an appropriate level for the habitat and the current harvest may be sustainable. The department has concerns regarding the sustainability of additional harvest on this bear population.

Brown bear hunting seasons and bag limits have been broadened over the last decade in Region III through resident tag fee exemptions, increased bag limits, longer seasons, and, in some units (including Units 20A and 20B), allowing the take of brown bears at registered bear bait stations. In the Fairbanks area, the take of brown bears over bait was first allowed in Unit 20C during RY12, followed by Units 20A and 20B in RY14. Most bear hunting seasons in Region III are August 10–June 30, with the exception of easily-accessed and heavily hunted areas, including Unit 20A and central and western portions of Unit 20B (remainder), where the season ends May 31.

There is a high volume of registered bear bait stations in Units 20A and 20B (n=116 and 525, respectively, during RY14–RY18). Harvest of brown bears taken over bait during RY14–RY18 averaged 4 in Unit 20A and 9 in Unit 20B.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because of biological concerns regarding the sustainability of additional harvest on this bear population. The department lacks precise scientific data on the number of bears and harvest rates and recommends a conservative management strategy. The take of brown bears at bait stations became legal in RY12 in Unit 20B. The average harvest during the 5 years previous to the legalization of baiting was 14 bears annually. After baiting became legal the average harvest for the past 5 years was 15 bears. A majority of the harvest now occurs during the spring hunting season. At this time the department would prefer to maintain a conservative harvest strategy. The risk of substantial increase in harvest is high because of the high volume of bear bait sites registered in the area coupled with extensive access, particularly in central Unit 20B.

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

PROPOSAL 149 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Allow brown bears to be taken over bait in Unit 25C.

PROPOSED BY: Michael Hajworonky

WHAT WOULD THE PROPOSAL DO? Allow the harvest of brown bears at bear bait stations in Unit 25C.

WHAT ARE THE CURRENT REGULATIONS?

Unit 25C

Resident and nonresident hunters:

- One brown/grizzly bear every regulatory year, September 1–May 31.
- Cubs and sows with cubs may not be taken.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing of hide and skull is required within 30 days of harvest.

- Hunting brown/grizzly bears over bait is not legal.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would result in increased opportunity and harvest.

BACKGROUND: The department does not have any quantifiable data regarding the brown bear population in Unit 25C. However, a large portion of the area is remote with minimal access, harvest is low, and most of the harvest occurs incidentally by hunters pursuing other species. Harvest in Unit 25C during 2014–2018 averaged 4 bears per year.

DEPARTMENT COMMENTS: The department **SUPPORTS** the additional harvest opportunity because there are no biological concerns. Any additional harvest would be minimal due to low human density and relatively poor access. Thus, there would be no measurable population effect.

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

PROPOSAL 150 – 5 AAC 92.113. Intensive Management Plans III. Establish an intensive management (IM) plan for wolves and bears in the Minto Flats Management Area in Unit 20B.

PROPOSED BY: Hanna Alexander

WHAT WOULD THE PROPOSAL DO? If adopted the department would create an IM plan that would include predator control for both wolves and bears in Minto Flats Management Area (MFMA). The first step in creating an IM plan would be for the board to direct the department to conduct a feasibility assessment to determine whether IM is feasible.

WHAT ARE THE CURRENT REGULATIONS? Currently there is no IM plan or predator control plan in the Minto Flats Management area.

There is a positive C&T finding for moose in Unit 20B within the MFMA, with an ANS of 20–40 moose.

Unit 20B (including MFMA) has a positive finding for IM because the unit is important for providing high levels of harvest for human consumptive use. The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would require the department to conduct an assessment of the feasibility of creating an IM plan in this area. If the board then determines an IM plan would be feasible, it would result in controlling predation on moose by wolves and/or bears in MFMA with the intent to increase the moose population and increase moose harvest.

BACKGROUND: The Minto Flats Management Area (MFMA) is a 951 mi² area in western Unit 20B with a nutritionally-stressed moose population. The MFMA currently has a moose density of 2.5 moose per square mile. Recent data collected by the department show that low twinning rates and low 10-month-old calf weights, which are indicators of nutritional stress, persist in this moose population.

Unit 20B had a population estimate of approximately 13,000 moose in 2017, which falls within the IM population objective of 12,000–15,000. In 2010, the MFMA population was estimated at about 4,100 moose (about 4 moose per square mile.) This high-density population exhibited signs of nutritional stress with low twinning rates, high browse removal rates, and low calf weights. With the use of antlerless moose harvest, the population was intentionally reduced to the current population of about 2,500 moose. Limited antlerless moose harvest continues in the area to maintain the population at this level.

During the spring of 2018, while investigating an outbreak of dog lice in the MFMA, the department located as many wolf packs as possible within the MFMA and adjacent areas (1,607 mi²). It was estimated that 9 packs contained 85–96 wolves. In the spring of 2019 while conducting the same project, a total of 50 wolves were estimated in this area. Although wolf densities appear to be high in this area, likely due to the high density of moose, 2018 and 2019 are the only years wolf surveys have been conducted in the past 20 years. At this time, the department has no data on bear populations within this area, but anecdotal information suggests that black bears are at moderate densities and grizzly bears exist at low densities.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This is a high-density moose population that continues to exhibit signs of nutritional stress. It would not be appropriate to reduce the predator population within this area to attempt to grow this moose population. The harvest of antlerless moose is currently at a level that does not allow growth of this population.

COST ANALYSIS: Adopting this proposal would have significant cost to the department.

PROPOSAL 151 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Lengthen the season dates for hunting wolves in a portion of Unit 20C.

PROPOSED BY: Hunter and Gatherers Lives Matter

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would align the wolf hunting season in this small portion of Unit 20C near Denali National Park with the remainder of Unit 20C and with nearby Unit 20A. This proposal would increase the wolf hunting season by 16 days.

WHAT ARE THE CURRENT REGULATIONS?

Resident and nonresident wolf hunting seasons and bag limits in Unit 20 for are as follows:

Unit 20C, that portion west of a line beginning at 63°48.146' N. LAT., 148° 59.934' W. LONG., North to 63° 49.445' N. LAT., 148° 59.935' W. LONG., then West to 63° 49.445' N. LAT., 149° 12.699' W. LONG., then North to 63° 54.642' N. LAT., 149° 12.699' W. LONG., and bounded on the South, West, and North by Denali National Park

- 10 wolves during August 10–April 15
Remainder of Unit 20

- 10 wolves during August 10–May 31

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would lengthen the wolf hunting season in the portion of Unit 20C near Denali National Park and align it with the remainder of Unit 20. It would increase wolf hunting opportunity by 16 days.

BACKGROUND: This is a high-profile area that has had many different regulations over the last 20 years. In March 2016, the board passed a proposal by the National Park Service to shorten the wolf hunting season to end April 15. The change was an effort to prevent wolves from being harvested over black bear bait stations in the area. During 2006–2016, a total of 3 wolves were reported harvested in May in this area when the wolf hunting season was aligned with the remainder of Unit 20.

DEPARTMENT COMMENTS: The department is **SUPPORTS** the increase in harvest opportunity because there are no biological concerns because the harvest of wolves in the area is low (averaging fewer than 5 annually), and is **NEUTRAL** on the allocative aspect of this proposal. Increasing the season by 16 days likely would minimally increase harvest and would not impact the Unit 20C wolf population.

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

PROPOSAL 154 – 5 AAC 92.530. Management areas. Restrict the taking of waterfowl in the Badger Slough area in Unit 20B to falconry and archery with flu-flu arrows.

PROPOSED BY: Debra Vance

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would change the methods by which a hunter would be allowed to harvest waterfowl. Only the use of a bow and arrow with flu-flu arrows and falconry would be allowed as methods to harvest waterfowl in this area.

WHAT ARE THE CURRENT REGULATIONS? Waterfowl season in Unit 20B, within the Chena Slough area is September 1–December 16. The use of shotguns is currently permitted in this area. This area is entirely within the Fairbanks Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would limit waterfowl hunters to archery equipment or falconry and would limit waterfowl hunting opportunity along Badger Slough.

BACKGROUND: Chena Slough (also known as Badger Slough) is a tributary of the Chena River that flows from the North Pole area along Badger Road to its confluence with the Chena River upstream of Fort Wainwright. The slough mainly flows through residential areas and near roadways and rarely flows through remote areas. The slough is outside city limits, therefore the use of firearms is not prohibited. The department does not have any data on effort or harvest by waterfowl hunters in this area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative portion of this, and in general **OPPOSES** the potential limitation of opportunity since there is no biological issue associated with it. Although the department rarely receives complaints from homeowners in the area, the Alaska Wildlife Troopers regularly field complaints about waterfowl hunters shooting near housing developments and other urban centers in this area.

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