



Submitted By
Sierra McLane
Submitted On
2/13/2020 9:35:54 PM
Affiliation

Dear Board of Game,

I live just outside of Denali National Park and I encourage you to support proposal 152. There is a time and a place for hunting and trapping in Alaska, but the Stampede corridor during breeding season is not one of them. The NPS has done good research and their proposal is as scientifically sound and socially reasonable as I expect anyone could formulate. Please support this proposal.

Thank you for your consideration,

Sierra McLane



Submitted By
Thomas E. Meacham
Submitted On
2/21/2020 1:57:03 PM
Affiliation
none

Phone
907-346-1077

Email
tmeacham@gci.net

Address
9500 Prospect Drive
Anchorage, Alaska 99507

On behalf of my wife and myself, I wish to indicate our support for Board Proposal No. 152 involving establishment of a limited wolf buffer zone on state land east of Denali National Park — but with an amendment that would extend it year-round instead of just a seasonally-limited period, and an amendment that would extend it to protect from hunting and trapping bears and all fur-bearers, not just wolves.

With Proposal No. 152 as amended, the “trapping opportunities lost” are infinitesimally small when compared to the anticipated enhancement of wildlife viewing opportunities within the Park, and particularly from the Park Road. This proposal will have the long-term benefit of raising public awareness of wildlife viewing opportunities within the Park, and will have a very positive effect on both in-state tourism and visitor numbers from Outside — and consequently, on the Alaskan economy.

The amended proposal that we are supporting coincides with that put forward by environmental consultant Richard Steiner, and others. This amended proposal should remain in place for a period of at least five years, to enable the objective quantification of its positive and negative effects, and a conclusion reached as to whether it has achieved its intended purposes.

Thank you for including this letter in support of Proposal No. 152, as amended, in the compilation of public comments on this proposal.

Sincerely,

Thomas E. Meacham and Jane C. Meacham
Anchorage, Alaska



Submitted By
William Meyerhoff
Submitted On
2/21/2020 11:19:15 PM
Affiliation
ATA

I am in opposition to Proposal 56 which bans the setting of traps within one mile of a house, dwelling, etc.

This proposal is unnecessary due to the fact that many organized municipalities have leash laws and it is pet owners responsibility to make sure that domestic pets are not free roaming harassing birds and wildlife during the time of year when they are most vulnerable to exhaustion and possible starvation due to exhaustion or injury. Responsible pet owners do not let pets roam free.



Submitted By
Nathan Miller
Submitted On
2/21/2020 1:31:33 PM
Affiliation

Phone
907-803-1517

Email
nmiller72@gmail.com

Address
PO BOX 1229
DELTA JUNCTION, Alaska 99737-0000

In regards to proposal 56 which would ban trapping within a mile of a house or mailbox. As a person living in rural Alaska, I don't see this as a good option. I trap within 1/2 mile of my house and don't want to stop doing that. This would potentially tie up thousands of acres of public land and make it off limits for harvest. I disagree with continued government meddling in law abiding citizen's affairs.

Nate



Submitted By
Kevin Morford
Submitted On
2/21/2020 3:33:28 PM
Affiliation
Alaska Resident

Phone
(907) 688-5888
Email
kmorfordjob@gmail.com
Address
P. O. Box 672263
Chugiak, Alaska 99567

I strongly urge the Board of Game to enact Proposal 152, and to adopt the Closure 1, option. While 1 to 3 trappers might be stopped from trapping for a part of the year as a result of this proposal, they would still have the ability to trap wolves for the remaining part of the year. On the other side of the equation, over 400,000 people visit Denali National Park each year, and many of them look forward to seeing wolves as a vital part of that experience. This tourism is a vital economic engine for Alaska, and produces hundreds of jobs for local residents. Studies have shown that trapping in the Stampede corridor is a major factor that reduces the prevalence of wolves in Denali National Park. Please help protect this vital economic resource by adopting Closure 1 as proposed in Proposal 152 at your upcoming meeting.



Submitted By
Lenore J Morford
Submitted On
2/21/2020 2:32:36 PM
Affiliation

Phone
9076885888

Email
lenorajm@gmail.com

Address
P.O.Box 672263
Chugiak, Alaska 99567

I support Prop 152 and Closure 1. I drove a shuttle bus through the park for 4 years in the 1980s. Tourists were very excited and grateful to see a wolf in the wild, living its life. This was a once in a lifetime experience for them that they would repeatedly tell me again and again. And many would say they would never forget seeing that wolf. Never forget their Denali Park visit because of the wildlife they saw.

This is not a solely biological issue. Wolves that will tolerate bus noises are extremely important to the tourists and their experience. This is important to visitor satisfaction and to Alaska's tourist economic engine.

As Alaskans we need to share our valuable wildlife with others. These wolves need to be protected. They are too important to too many people.

Sincerely,

Lenora Morford



Submitted By
Nicholas Muche
Submitted On
2/20/2020 5:54:34 PM
Affiliation

I'm in opposition to Proposal 49.

The process to obtain a crossbow permit in Alaska for those that are unable to draw a bow is not very difficult. Those that would like to use a crossbow because they cannot use a bow are able to go through the process very easily and obtain that permit. Just because someone is 60 years old does not mean that they are unable to shoot a bow and must use a crossbow. As stated, there is a process and those that need to use a crossbow have a way of making that happen, regardless of age.

Submitted By
Nicholas Muche
Submitted On
2/6/2020 9:13:46 AM
Affiliation

I oppose Proposal 71 to allow baiting of Grizzly/Brown Bears in Unit 24A. Unit 24A is road accessible via the Dalton Highway and provides a pristine environment to hunt both Brown/Grizzly Bears and Black Bears with archery equipment. There are many Grizzly bears in this unit and allowing hunters to bait them would congregate them into prime moose calving grounds when they are most vulnerable. Additionally, this area receives little pressure from hunters in the spring and if baiting is allowed for grizzly bears there stands to be a significant increase in activity, hunter conflict, etc. There are many units that allow Brown/Grizzly Bear baiting but none of them are nearly as accessible or pristine as the DHCMA portion of Unit 24A. If the Department feels the need for an increased harvest in this particular area, there are other means to achieve that, such as allowing for a 2 bear harvest, reduction in NR Tag prices, same day airborne harvest or an extended season. I strongly oppose this proposal.



Submitted By
Jere & Sandy Murray
Submitted On
1/31/2020 4:35:02 PM
Affiliation

We whole heartedly support Proposal 91 (below).

We have visited the area in question for several weeks in nearly all falls since late 1990s and since 2015 both spring and fall for a month to six weeks each. We have hunted and/or observed the upland birds of the area extensively during each visit. We have observed the behavior of visiting and local hunters as well.

During this time period we have observed a definite pronounced decrease in the overall population of all three grouse populations in the area.

There are so many roads in the area access is significantly different than most areas in Alaska. Birds are available along roads morning and evening as they gather gravel. Hunters take advantage of this behavior and the impact on population is, In my opinion, significant. The harvest limits should be set lower than the general levels in wilder areas of the state in recognition of the different nature of area 20D. Spruce grouse should also be included in the harvest limit reductions but Proposal 91 is a good start.

Thank you for this opportunity to comment.

Jere & Sandy Murray

Interior and Eastern Arctic Region

Meeting dates: March 6-14, 2020

In Fairbanks (9 days) at Pike's Waterfront Lodge Comments due: February 21, 2020 Game Management Units 12, 19, 20, 21, 24, 25, 26B, and 26C

Delta Area Proposals – Unit 20D

PROPOSAL 91

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

Reduce the bag and possession limits for grouse in a portion of Unit 20D as follows:

The Hunting Regulations Booklet would read:

Unit 20D, that portion lying west of the east bank of the Johnson River and south of the north bank of the Tanana River:

Five per day, fifteen in possession, provided that not more than ten in possession may be ruffed grouse or sharp-tailed grouse.....Aug 25 - Mar 31

By falconry only, five per day, ten in possession, provided that not more than two per day

and two in possession may be ruffed grouse or sharp-tailed grouse.....Aug 10 - Aug 24 Change 5 AAC 85.065 to read:

Unit 20D, that portion lying west of the east bank of the Johnson River and south of the north bank of the Tanana River

5 [10] per day, of which not more than Aug. 10 - Aug. 24 Aug. 10 - Aug. 24

2 may be ruffed grouse or sharp



tailed grouse, by falconry only;

10 in possession, of which not

more than 2 may be ruffed grouse or

sharp-tailed grouse, by falconry only

5 [15] per day, 15 in possession,

of which not more than 10 [5] may be

Aug. 25 - Mar. 31 Aug. 25 - Mar. 31

ruffed grouse or sharp-tailed grouse

[30 IN POSSESSION, OF WHICH NOT

MORE THAN 10 MAY BE SHARP-TAILED

GROUSE;] however, a season may be

announced by emergency order during

which the bag limit is less than 5 [15] grouse per day, 15 [30] in possession, and less than 10 [5] ruffed grouse or sharp-tailed grouse [PER DAY, 10] in possession What is the issue you would like the board to address and why? Grouse hunting opportunity and harvest allocation in Unit 20D. Grouse populations, while naturally cyclic, are notoriously slow to recover from greater than normal population declines caused by weather, habitat loss, and over harvest. Unit 20D enjoys a reputation as the epicenter of quality grouse hunting in Alaska, due to huntable populations of all three species of grouse found in interior Alaska, and a road and trail network that provides easy access to large areas of prime grouse habitat. That reputation, buoyed by outdoor TV show coverage, articles in hunting periodicals, and books on grouse hunting in Alaska, draws many hunters from around the state, as well as nonresidents. Hunters from Alaska urban centers and nonresidents far outnumber local hunters and are more likely to continue to harvest birds up to the limit, even when populations are noticeably down. This is natural since they have invested time and money to get to Unit 20D and want to maximize their return. Because of the consistently increasing pressure from these hunters, local hunters often choose to forego hunting and harvesting grouse when populations are down.

In addition, with the increasing number of hunters, more each year come earlier in the season to try and beat other hunters and take advantage of higher grouse numbers early on, before grouse numbers have been substantially reduced. This has resulted in a disproportionate share of available grouse being harvested during the first two weeks of the fall season, leaving few grouse for hunters choosing to wait until the later part of the fall season (mid-September and later) when grouse are more mature, cooler/drier conditions are available for working dogs, and hunters can enjoy a more traditional mid to late fall upland hunting experience. Another factor contributing to the high early pressure is the "two-fer" opportunity that allows hunters to get in a week of grouse hunting in August, then switch to hunting waterfowl and/or moose - two other hunting opportunities for which the area is well-known, and which draw non-local hunters.

To more equitably allocate the pre-season grouse population to hunters throughout the fall season, harvest during the early part of the season needs to be reduced by lowering the daily bag and possession limits. This will more equally allocate the portion of the grouse population available for harvest annually to all grouse hunters regardless of when they decide to hunt in the fall. Thus, rather than incentivizing grouse hunters to concentrate their efforts earlier and earlier, they can have similar harvest opportunities longer in the season. As the trend toward high pressure early in the season increases, and the accessible areas become crowded, the quality of the hunting experience is degraded.

A daily bag limit that matches species limits also removes potential for accidentally exceeding a species limit. A very common grouse hunting technique, especially for hunters without dogs, is to shoot sitting grouse from the ground or from trees. Especially with a rim fire rifle, it is possible to harvest all or most of the birds in a flock, since they often don't spook and fly at the shot, or go very far when they do. These hunters are more likely to shoot birds before the species is identified, as identification is more difficult when the tail is not readily visible prior to the decision to shoot.

In these situations, with a daily limit of 15, it is easily possible that a hunter could exceed a species specific limit of five birds without even realizing it.

The Delta Advisory Committee originally conceived a proposal to limit ruffed grouse to five per day, to match the current sharp-tailed grouse limit, and leave the total daily bag (15) and possession



(30) limits unchanged. We decided to modify that into a five bird per day total limit to increase opportunity, maintain sustainable harvest levels for all species, simplify the regulation, and to reduce the complexity of shoot/don't shoot decisions in the field.

In addition to helping stabilize populations of our various grouse to normal cyclic variations, the five-bird daily limit will maximize opportunity for all hunters throughout the season and eliminate the possibility of accidentally exceeding a species specific limit. While this proposal reduces the daily bag limit by two thirds, it only reduces the possession limit by one half, to reduce the overall impact of the new bag limit on hunters who have limited time in the area.

PROPOSED BY: Delta Fish & Game Advisory Committee (EG-F19-067)

Interior and Eastern Arctic Region Proposals



Submitted By
Bill Nash
Submitted On
2/19/2020 1:50:12 PM
Affiliation

I am in favor of Proposals #50 and #53. I ask that you please approve. These proposals provide for more opportunity while having almost no impact on wildlife populations. I am **not** in favor of Proposal #49. Alaska already allows individuals with disabilities to apply for using a crossbow. Allowing the mass use of crossbows has shown to have a significant impact on wildlife populations creating more restrictions and less opportunity. Crossbows have no place in an archery season.



United States Department of the Interior
NATIONAL PARK SERVICE

Interior Region 11 • Alaska
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
I.B (AKRO-NR) 20200206

FEB 21 2020

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for the Interior and Eastern Arctic Region being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS areas. We recognize and support the State's primary stewardship role in wildlife management and appreciate the recognition of federal laws and regulations applicable to the NPS.

Proposal 45: NPS Recommendation: Support

This proposal was submitted by the Grayling, Anvik, Shageluk, Holy Cross Fish and Game Advisory Committee. NPS supports this proposal to restrict the use of moose, caribou and reindeer urine as scent lures in Units 12, 19, 20, 21, 24, 25, 26B and 26C to reduce the risk of introducing Chronic Wasting Disease (CWD). The use of deer and elk urine is currently prohibited in State regulations for CWD prevention. CWD has not yet been found in Alaska, and this is a positive step to keep Alaska CWD-free.

Proposal 46 & 75: NPS Recommendation: Oppose

These proposals seek to establish an intensive management program for brown and black bears in Units 12, 19, 20, 21, 24, 25, 26B, 26C and for wolves in Units 21D and 24. Because Intensive management programs are authorized under non-hunting regulations, they require NPS approval on national preserves. If the Board adopts either of these proposals, NPS lands should be excluded from predator control efforts, as is reflected in ADG&G proposals 86 and 96.

Proposal 48: NPS Recommendation: Oppose

This proposal would extend the wolf hunting season by ten days in Units 19, 20, 21, 24, 25, 26B and 26C with a stated purpose of reducing wolves to enhance populations of Dall's sheep and



caribou. This proposal, if implemented in units proximate to Denali National Park and Preserve, could exacerbate reduced wolf viewing opportunities in the park. Since 2010, seeing a wolf during a Denali bus tour has gone from common to quite rare. If the Board adopts this proposal, we recommend limiting any increase adjacent to Denali National Park and Preserve, consistent with the NPS recommendation for Proposal 152.

Proposal 79 & 80: NPS Recommendation: Oppose

These proposals were submitted by the Fairbanks AC and Resident Hunters of Alaska. They would lengthen the hunting season by 30 days, double the bag limit for caribou bulls and significantly increase the bag limit for cows of the Central Arctic Caribou herd (CAH), and establish a limited registration-permit hunt for cows. The current regulations were put in place in 2017 in response to a dramatic population decline of the herd. Considering the short time since the regulation change, evidence of a recovery from the dramatic decline has not been established to warrant an increase in harvest.

Proposal 81: NPS Recommendation: Oppose

This proposal would increase the nonresident bag limit from one to two bull caribou for the Central and Western Arctic Caribou Herds. Recent research suggests that the Central Arctic Herd has not recovered following a dramatic decline (approximately stable at 20,000 from 2016 to 2019). Similarly, the Western Arctic Herd (WAH) declined significantly beginning in 2003 and has yet to recover. This proposal is also inconsistent with the Western Arctic Caribou Working Group's recommendations for harvest.

Proposal 149: NPS Recommendation: Neutral

This proposal would allow brown/grizzly bears to be taken over bait in Unit 25C. NPS is currently considering a regulatory change that would allow the harvest of bears over bait in certain National Preserves. However, this practice is currently prohibited on NPS lands. If the Board adopts this proposal, NPS lands may need to be excluded.

Proposal 151: NPS Recommendation: Oppose

This proposal was submitted by the group, Hunter & Gatherers Lives Matter. It would change the wolf season in a small portion of 20C to realign with the rest of the Unit. Adopting this proposal would reverse a previous (2017) change to eliminate the overlap between spring bear hunting over bait and wolf hunting and trapping. Prior to the 2017 regulatory change, several wolves were harvested at bear bait stations. This proposal could exacerbate established problems with Denali National Park and Preserve's reduced wolf viewing opportunities. Since 2010, seeing a wolf during a Denali bus tour has gone from common to quite rare. We recommend limiting any harvest increase adjacent to Denali National Park and Preserve, consistent with our recommendation for Proposal 152.

Proposal 152: NPS Recommendation: Support

This proposal was submitted by Denali National Park & Preserve staff. Recent research suggests that limiting harvest of wolves along the boundaries of protected areas is associated with



increased wolf-sighting opportunities for visitors to these areas. This in turn can increase economic benefits of wolf viewing in adjacent communities.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me or Mary Hake, Wildlife Biologist and liaison to the Board of Game, at 907-644-3576.

Sincerely,

Joel Hard
Deputy Regional Director
National Park Service

cc:

Doug Vincent-Lang, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Eddie Grasser, Director, Division of Wildlife Conservation, ADF&G
Steve Wackowski, Special Assistant to the Secretary for Alaska
Don Striker, Acting Regional Director, NPS
Greg Siekaniec, Regional Director, USFWS
Tom Doolittle, Deputy Assistant Regional Director, USFWS-Office of Subsistence Management
Ben Bobowski, Superintendent, Wrangell-St. Elias National Park and Preserve
Susanne Fleek-Green, Superintendent, Lake Clark National Park and Preserve
Greg Dudgeon, Superintendent, Gates of the Arctic National Park and Preserve and Yukon-Charley Rivers National Preserve
Denice Swanke, Acting Superintendent, Denali National Park and Preserve
Grant Hilderbrand, Regional Chief of Natural Resources, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office



Submitted By
Tim Nelson
Submitted On
1/31/2020 11:10:33 AM
Affiliation

Phone
9078234076

Email
tim@timsalaskanguideservice.com

Address
po box 110
Chitina, Alaska 99566

Proposal 70

My name is Tim Nelson and I oppose proposal 70

I have guided in units 24A and 25A since 2004. In this time I have spent thousands of hours surveying game in the area. The grizzly bears in this area rarely have prime fur before September. Since the grizzlies this far north tend to be smaller than in other parts of the state it is their long thick fur with its wide range of color variance that is the real trophy. In my opinion, harvesting a grizzly before September 1st is wasteful and unethical.

In 2004 the season for Brown/Grizzly Bear in both 24A and 25A opened on September 1st and has since become earlier and earlier. I understand guides and outfitters wanting to book more hunts but it has to stop somewhere. We shouldn't let greed override good judgment and ethical hunting practices. **Just because there is a bear in the woods doesn't mean that you have to shoot it!**



Submitted By
John Nichols
Submitted On
2/21/2020 10:19:06 PM
Affiliation

I do not support Proposal 56. Having a one mile no trapping zone around all homes, mailboxes, etc will be extremely hard to determine and enforce. Trapping is a big part of what made Alaska a state, and to do away with trapping so pets can be allowed to run feral is the wrong approach.



Submitted By

Dominic Nickles

Submitted On

2/20/2020 10:07:42 AM

Affiliation

Phone

907232871

Email

Never_summer_1@hotmail.com

Address

380 e diamond wood way

Wasilla, Alaska 99654

I Support Proposals 50, 53, 84, 85



Submitted By
Jon Nierenberg
Submitted On
2/21/2020 3:58:56 AM
Affiliation
Owner, EarthSong Lodge and Denali Dog Sled Expeditions

Phone
9074509793
Email
earthsong@mtaonline.net
Address
PO Box 89
Healy, Alaska 99743

Dear Alaska Department of Fish and Game,

This comment submitted is to show full support for Proposal 152, the seasonal closure to wolf hunting and trapping for the Stampede Trail corridor. EarthSong Lodge and Denali Dog Sled Expeditions are year-round businesses located on Stampede Road, and are geared towards the tourism industry both in-state and out-of-state visitors. We agree with the science that supports this proposal, but this comment will be based on the economics that support the closure in specific. The presence of a healthy wolf population both inside and immediately outside the Denali National Park boundary greatly enhances our guests' experience. Our summer guests are traveling into Denali National Park and observation of a wolf in addition to other wildlife is the highlight of their visit. Our winter guests traveling by sled dog team have a significantly better mushing experience if they observe wolves or their signs/tracks while sledding the Stampede Corridor. EarthSong Lodge has been in operation since 1997, and Denali Dog Sled Expeditions and its guiding operation has been in operation since 1985. We are the longest continually operated business on Stampede Road and in the Wolf Townships. We hope the Department adopts this proposal based upon economics and science.

Sincerely,

Jon Nierenberg

Owner, EarthSong Lodge and Denali Dog Sled Expeditions



Submitted By
Patrick Nolde
Submitted On
2/20/2020 8:42:08 PM
Affiliation

Re: Proposal 112 Unit 19C

I have hunted the unit discribed above for several years now and look forward to it every year with my hunting partners. It has become somewhat of a tradition that we talk about all year and look forward to. Every year we have seen several moose and it continues to be a good quality hunt. I would like to see it stay as is with a Harvest ticket for residents and with no changes for residents of Alaska. I really don't believe any new changes need to be done. However, if something is to be changed I urge you to first consider the changes to affect non-residents before affecting others. The Alaska state constitution states we are to manage the resources for the maximum benefit of Alaska residents. There is a sense of pride, respect and courtesy that exists amongst the residents of Alaska that hunt this unit yearly. So, much so that we have picked up trash and litter from others in which we haul out to be disposed of at our own expense. Residents have also helped in the past, clear out brush from the local landing strip. In the last couple of years, the proportion of non-resident hunters appears to be increasing. The residents that hunt this area yearly - have a valued interest in keeping the moose population healthy so we can return year after year. Non-residents may treat it as a one and done scenario, with little of no conservation motives for future hunting excursions. I suggest speaking to the Alaska State Trooper that was out there in 2019 as he worked very hard at getting data from each camp on hunt success and following the laws. His information is a must for the local biologist to see to get some hard data.

In closing I hope you consider no changes - but if the hard evidence and supported facts show some provable trend, then I suggest thinking about our Alaska Culture first and non-residents second.

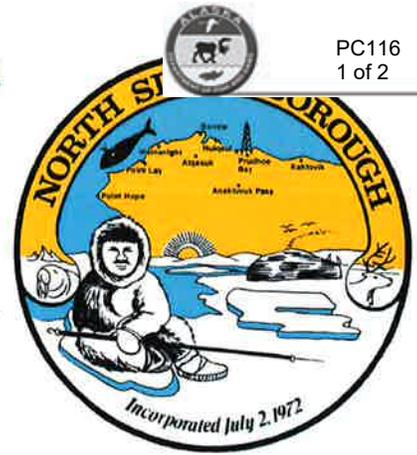
North Slope Borough

OFFICE OF THE MAYOR

PC116
1 of 2

P.O. Box 69
Barrow, Alaska 99723
Phone: 907 852-2611 or 0200
Fax: 907 852-0337 or 2595

Harry K. Brower, Jr., Mayor



ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526 | Juneau, AK 99811-5526

Submitted Via Email: dfg.bog.comments@alaska.gov

The North Slope Borough appreciates this opportunity to submit the following comments on Board of Game Proposals 63 and 64 as presented in the Proposal Book published in August 2019.

Proposal 63 would repeal Alaska Administrative Code Section 5 AAC 92.530(7) in total, thereby eliminating the Dalton Highway Corridor Management Area (DHCMA). Proposal 64 has been presented as a placeholder to solicit public and agency input regarding the interpretation of state statutes and regulations pertaining to the DHCMA. Proposal 64 states that clarification is needed to resolve confusion within state government and the public regarding which activities and methods of access are legal within the DHCMA and what changes to 5 AAC 92.530(7) the Board of Game could legally undertake.

Proposal 63 is misleadingly presented as a simple and reasonable action to remove provisions that are duplicative, unnecessary, and confusing to the public and to law enforcement. Our attempts to discuss the proposals with state representatives in recent months have made it clear that adopting these measures as proposed is more complex than presented. In fact, there is much confusion around these proposals. In several responses to Borough staff seeking clarity regarding the intent and potential implications of these proposals, Alaska Department of Fish and Game and Department of Law representatives have acknowledged that the measures raise a concerning level of underlying complexity involving the authorities and responsibilities of multiple departments, including the Alaska Wildlife Troopers, Department of Fish and Game, Department of Law, Department of Natural Resources, and Department of Transportation. We were informed in November 2019 that those departments were undertaking independent reviews and analyses intended to inform ultimate decision making, and that the work would be concluded by early January. We have repeatedly asked to be afforded the opportunity to review those analyses prior to formulating final comments on the proposals. We have yet to see any.

Perhaps more important than the failure to share completed analyses, it appears that the proponents of the Proposals and no State department has reached out to the Borough or any other potentially affected stakeholder to discuss specific concerns and participate in the formulation of the Proposals or the analyses. Of particular concern is the potential for unintended consequences that may result from adoption of the proposals. Foremost among these is the likelihood that adoption of the proposals would result in increased recreational use of the Highway, the corridor, and adjacent lands.

Any significant increase would require heightened attention, and likely funding, across management systems, including those dealing with public safety, wildlife and transportation safety, communication, emergency response, sanitation, waste disposal, search and rescue, subsistence use, and security of the Highway, Trans-Alaska Oil Pipeline, and other infrastructure of national importance. Any required expansion of responsibility or increased workload within any state department would also likely have budgetary implications which have yet to be considered. Furthermore, it is likely that the Proposal would have substantial financial and resource impacts to the North Slope Borough for law enforcement, public safety, and search and rescue. Consultation between the multiple affected state departments, the municipalities within which the Highway and corridor are located, and with other concerned stakeholders would certainly contribute to the identification of any such consequences. Publication of Proposal 64 seeking written comment or testimony is no substitute for the kind of multiple party consultation that must take place prior to Board of Game's consideration of a proposal acknowledged to raise issues as far ranging and complex as Proposal 63.

Accordingly, it is the strong recommendation of the Borough that the State, led by the Department of Fish and Game, initiate outreach to potentially affected communities and stakeholders and convene a multi-departmental meeting, the North Slope Borough, and stakeholder representatives to clarify and arrive at a common understanding of the current legal issues at play. In order for all parties to submit informed comments and testimony, and for the Board to make a responsible decision, there must be prior clarification of the definition and legal use of highway vehicles, snow machines and off-road vehicles in the DHCMA for hunting and trapping, of firearms, and of the transport of furbearers and trapping bait when trapping in the DHCMA, as well as consideration of the intended and potential unintended consequences of eliminating the DHCMA within the context of that common understanding. Proposal 63 should not be considered or acted upon by the Board of Game until that consultation has been conducted, some consensus has been reached, and its resulting conclusions made available. The North Slope Borough has great concerns regarding the lack of clarity by any department regarding the intent of Proposal 63, the lack of outreach to affected stakeholders, and the lack of consideration of unintended consequences passage may have.

Thank you for considering these comments.

Sincerely,


Harry K. Brower, Jr.
Mayor

Cc: Governor Mike Dunleavy
Commissioner Doug Vincent-Lang, Alaska Department of Fish and Game
Senator Donald Olson
Representative John Lincoln
Taquik Hepa, NSB Director of Wildlife Management
Gordon Brower, NSB Director of Planning



NORTH SLOPE BOROUGH

Department of Wildlife Management

P.O. Box 69
Barrow, Alaska 99723

Phone: Central Office : (907) 852-2611 ext. 350
 or: (907) 852-0350
 FAX: (907) 852 0351
Arctic Research Facility: (907) 852-0352



RAYNITA "TAQULIK" HEPA, DIRECTOR

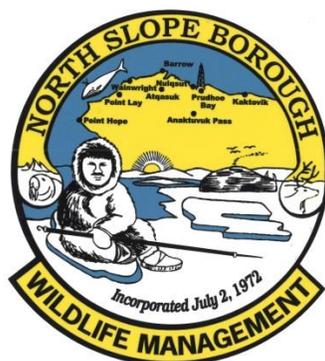
20 November, 2019

Dear Chairman Spraker and Members of the Alaska Board of Game:

Please find attached a copy of "Subsistence harvest of caribou in eight North Slope villages, Alaska: 2014-2018". I am submitting this as support documentation for Proposal 28 and 78 submitted by the North Slope Advisory Committee to be discussed at the 2020 Arctic / Western Region meeting in Nome and the Interior / Northeast Arctic region BOG meeting in Fairbanks, respectively. As you may be aware our Department traveled to all communities on the North Slope to discuss registration permit and harvest ticket requirements for North Slope communities. At those meetings we listened to testimony that opposed those requirements and they overwhelmingly supported our Department's collection of that harvest information to be used to make informed management decisions. It is our hope that this document will help to demonstrate our commitment to collecting this important information. I look forward to testifying in the upcoming Board of Game meetings in January and March 2020.

Respectfully,

Brian Person
Senior Wildlife Biologist
NSB Department of Wildlife management
Brian.Person@north-slope.org



Subsistence Harvest of Caribou in Eight North Slope Villages, Alaska: 2014-2018

Brian T. Person, Carla Kayotuk, and Frances (JackyLou) Olemaun

North Slope Borough Department of Wildlife Management

P.O. Box 69, Barrow, AK 99723



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Subsistence harvest of caribou in eight North Slope villages, Alaska: 2014-2018

Overview:

The North Slope Borough Department of Wildlife Management (DWM) has collected subsistence harvest data on fish, birds, marine and terrestrial mammals, and plants utilized by residents of the North Slope beginning in the early 1990's. In some years this program has struggled to consistently collect and analyze these data in all communities due to various staffing, logistic, and financial set-backs. Beginning in 2014, the DWM has made a concerted effort to improve the consistent collection of caribou harvest data due to the decline of caribou populations on the North Slope. This report provides information on the methods used to collect and analyze caribou harvest data, discusses ways that we have tried to improve this program, and presents caribou harvest estimates for each North Slope community.

Methods:

The DWM attempted to conduct household caribou harvest surveys in all communities between 2014 and 2018 using the same survey instrument (Appendix A). In 2016 we slightly modified the survey instrument by adding 8 activity codes to facilitate data management. In 2015 the North Slope Borough Planning & Community Services Department collected data for an Economic Profile and Census Report in all North Slope communities. To avoid *survey fatigue* we requested that they include our survey instrument as part of the Census rather than having DWM staff conduct an independent survey. Similarly, in 2015 there were 3 independent surveys scheduled in most North Slope communities and we requested that Stephen R. Braund & Associates (SRB&A) collect household caribou harvest data on the DWM's behalf so as to avoid a 4th survey. Finally, as part of a stipulation to Conoco Phillips AK Alpine Satellite Development Project SRB&A was contracted to collect subsistence harvest data from the village of Nuiqsut. They agreed and collected household caribou harvest data using the DWM instrument between 2015 and 2018. DWM staff collected household harvest data from 2016 through 2018.

Caribou harvest data was collected at the household level for all surveys (*i.e.* if multiple hunters lived in the same household their harvest was combined into the reported household harvest). In most years data were collected using a one year recall- two exceptions to this exist. The 2017 data was collected using a two year recall for all communities except for Nuiqsut (NUI), Wainwright (AIN), and Kaktovik (KAK); and in 2015 through 2017 the communities of AIN and KAK data was collected using two six month recall surveys in each year.

In all communities other than Barrow (BRW) we attempted to conduct a census. Despite this, we worked off of a randomized household list because some of our visits to villages were only for a few days and we recognized that we might not be able to complete the census. We wanted to ensure that our choice of households to be interviewed was unbiased and therefore worked down the list of random households. In Barrow we also generated a random household list annually and we attempted to survey the first 300 households on that list (~ one-quarter of the total households).



Metrics:

Reported household harvest is the sum of male, female, and unknown sex (some respondents could not remember the number of bull or cows harvested) harvested caribou and reported during the interview. We estimated *community harvest* to be the ratio of the sum of reported household harvest divided by the number of households surveyed in each community multiplied by the total number of households in that community. We estimated the variation surrounding that estimate using methods by Cochran (1977) which are presented in Appendix B. We estimated the 95 % confidence interval (95 % CI) by multiplying the standard error by 1.96. We did not have the databases from the North Slope Borough Planning & Community Services Department's contractor or SRB&A therefore we cannot present 95% CI for those estimates. We estimated the *average household caribou harvest* to be the ratio of community harvest divided by the total number of households in that community. Our estimates of the *sex ratio* of the harvest are derived from the total number of males or females reported harvested divided by the sum of male and females reported harvested multiplied by 100. It is assumed that caribou reported with unknown sex were harvested at a similar ratio as the reported harvest.

We also collected information on the health of caribou harvested using standardized methods developed by CARMA, the general harvest location, and the month in which harvest occurred. We have yet to summarize that information.

Results and Discussion:

Community caribou harvest varied by community and year (Table 1). All communities harvest a fairly substantial number of caribou and its importance to the diet and culture of these largely Inupiat communities has been documented (Fuller and George 1997, Bacon et al. 2011, Braem 2017). Community caribou harvest was consistently highest in Barrow and Wainwright. Community harvest estimates for Point Lay in 2014 and 2015 were much higher than in 2016 through 2018 which could be attributed to the distribution of caribou being closer to the community in those years. Similarly, our 2017 estimate for Point Hope is high when compared to other years included in this report and reflects a favorable distribution of caribou near that community. Average household caribou harvest was consistently highest for the communities of Wainwright and Anaktuvuk Pass which underscores the importance of caribou to these communities (Table 2). Point Hope and Kaktovik tended to have the lowest average household harvest. Both of these communities have limited access to caribou when they are near the community. Kaktovik's best access is via snow machine in winter and caribou typically don't overwinter on the Coastal Plain in large numbers. Similarly, their access in the summer is limited via boat to coastal regions when caribou use the coast as insect relief for brief periods of the summer before moving back towards the mountains.

Our estimates of the sex ratio of caribou harvest are presented in Table 3. Bull caribou are the preferred harvest (Fuller and George 1997, Bacon et al. 2011). Our bull : cow harvest estimates don't necessarily reflect that preference. Atqasuk usually has caribou near the community year round and their bull : cow ratio reflects that they typically have the option to harvest bulls. Cow harvest is usually higher when caribou are only accessible during rut or in the few months post rut. Anaktuvuk Pass prefers to harvest



caribou in August and September if caribou migrate through their valley. Over the past decade caribou have only been accessible in large numbers in late October and November and in those months they have to rely on cow caribou. Our bull:cow ratios may reflect a change in caribou preference towards the harvest of cows, the lack of accessibility to bull caribou during the fall and early winter months, a decrease in the bull:cow ratio in the population, or a combination of these factors.

Moving Forward with our Harvest Documentation Program:

We have made a concerted effort to census caribou harvest in all 8 North Slope communities (Table 4). We are very grateful to SRB&A for their efforts to collect harvest information in Nuiqsut and in the coastal communities in 2015 for our Department. It is unfortunate that we failed to collect caribou harvest information in Anaktuvuk Pass in 2015 and 2018 and we intend to improve these efforts by hiring a Subsistence Research Assistant (see below) from that community and by traveling to AKP more often. We recognize that we surveyed a fairly low percentage of households in Barrow. Barrow is a large and culturally diverse community that has posed challenges to researchers in the past. One problem we encountered was that household participants were working when we attempted to interview them. Shifting our schedule to evenings and weekends helped somewhat but in the future we will try to interview participants at their work place.

We have made several improvements to our harvest documentation project and we will continue to find new ways to improve it while maintaining consistent data collection. We listened to suggestions from participants and have begun to provide communities with calendars which an increasing number of hunters use to document their harvest. This helps to improve harvest recall, thus data quality. We have created a database and continue to update it to facilitate data management, data quality, and data storage. We have changed the structure of the subsistence section of our Department and are attempting to fill Subsistence Research Assistant positions in more communities. We have not yet summarized harvest location data. This data exists in the format of Inupiat place names. Our plan is to work with focal hunters in each community to document those place names on maps (some already exist) and to translate those areas into a GIS format. Similarly, we have yet to summarize the data on the health and body condition of harvested caribou and intend to work on that in the near future. Finally, we are in the early stages of developing a program for our database that will summarize harvest data by sex and month.

**Table 1.** Estimated annual caribou harvest by community.

Estimated community harvest of caribou ($\pm 95\%$ CI)								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	951	1042	173	2860	248	358 ¹	212	951
2015 ²	756	----	----	3000	303	621 \pm 82	422	756
2016 ³	914 \pm 372	859 \pm 474	269 \pm 55	3246 \pm 1033	133 \pm 37	481 \pm 108	242 \pm 22	215 \pm 43
2017 ³	806 \pm 188	548 \pm 133	145 \pm 70	2636 \pm 1397	119 \pm 202	635 \pm 104	1282 \pm 243	290 \pm 74
2018 ³	1012 \pm 453	----	380 \pm 127	3829 \pm 1866	108 \pm 122	497	294 \pm 241	191 \pm 24

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was conducted during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**Table 2.** Average annual household caribou harvest by community.

Average household caribou harvest								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	6.2	9.7	2.7	2.4	3.1	2.9	1	12.7
2015 ²	4.9	----	----	2.5	3.8	5	2	10.1
2016 ³	5.9	8	4.1	2.7	1.7	1.7	1.1	2.9
2017 ³	5.2	5.1	2.2	2.2	1.5	5	6	3.9
2018 ³	6.6	----	5.8	3.2	1.4	4	1.4	2.5

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was conducted during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**Table 3.** Sex ratio of reported caribou harvest by community and year.

Sex ratio of reported harvest (% Bull : % Cow)								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	24 : 76	44 : 56	70 : 30	62 : 38	75 : 25	¹ 84 : 16	65 : 35	52 : 48
2015 ²	52 : 48	----	----	65 : 35	22 : 78	14 : 86	37 : 63	52 : 48
2016 ³	61 : 39	77 : 23	76 : 24	57 : 43	55 : 45	----	69 : 31	72 : 28
2017 ³	55 : 45	56 : 44	74 : 26	76 : 24	51 : 49	----	94 : 6	71 : 29
2018 ³	57 : 43	----	83 : 17	77 : 23	71 : 29	----	100 : 0	78 : 22

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was completed during the NSB 2015 NSB 2015 Economic Profile & Census

²survey was conducted by Stephan R. Braund & Associates (SRB&A).

³Survey completed by the NSB DWM

**Table 4.** Percent of total households surveyed in each community by year.

Percent of total households surveyed								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	50 %	48 %	42 %	15 %	26 %	¹ 45 %	22 %	75 %
2015 ²	59 %	----	----	65 %	67 %	81 %	76 %	82 %
2016 ³	47 %	36 %	68 %	21 %	76 %	83 %	88 %	79 %
2017 ³	79 %	58 %	52 %	10 %	83 %	79 %	39 %	63 %
2018 ³	52 %	0 %	52 %	8 %	64 %	----	35 %	88 %

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was completed during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM



Appendix A.

NSB DWM caribou harvest questions for JAN-DEC 20XX:

Village _____ Household ID _____ Interviewer _____

Date of Interview _____

1. Did you hunt caribou from January to December in 20XX? Yes _____ No _____

Activity Code _____ 1) Harvested 2) Attempted but no harvest 3) Did not attempt harvest
4) Out hunting 5) Out of town 6) Could not contact 7) Did not want
to be interviewed 8) Other

If Yes:

2. What month/s did you harvest them? Please write the number harvested and sex in each month:

Month	Bull	Cow	UNK	Month	Bull	Cow	UNK
Jan				Feb			
Mar				Apr			
May				Jun			
Jul				Aug			
Sep				Oct			
Nov				Dec			

3. How many did you harvest? Male _____ Female _____ UNK _____ Total _____

4. In general how would you assess the health of the caribou you harvested? _____

1. **Skinny** (no back fat, little or no gut or kidney fat).
2. **Not Bad** (little back fat, some gut or kidney fat).
3. **Fat** (nice layer back fat, plenty of gut or kidney fat).
4. **Very Fat** (thick layer back fat all the way up the back & fat inside).

5. General hunt location (kill site/s)



Appendix B.

Computing a total annual harvest estimate for a species and its standard error

Let y_{hi} represent the total number harvested by the i th sampled household in Stratum h . Then the sample mean number \bar{y}_h harvested in stratum h is given by Equation (1):

Equation (1)

$$\bar{y}_h = \frac{1}{n_h} \sum_{i=1}^{n_h} y_{hi},$$

and total annual harvest T is given by Equation (2):

Equation (2)

$$T = \sum_{h=1}^6 N_h \bar{y}_h.$$

with estimated variance $V(T)$ given by Equation (3):

Equation (3)

$$V(T) = \sum_{h=1}^6 N_h (N_h - n_h) s_h^2 / n_h$$

where s_h^2 , the sample variance in Stratum h , is given by Equation (4):

Equation (4)

$$s_h^2 = \frac{1}{n_h - 1} \sum_{i=1}^{n_h} (y_{hi} - \bar{y}_h)^2$$

so s_h is the sample standard deviation in the stratum. Note that s_h^2 cannot be computed if $n_h = 1$, i.e. only a single household in the stratum harvested the species.

The standard error SE of T is given by Equation (5):

Equation (5)

$$SE = \sqrt{V(T)}$$

with $V(T)$ given by Equation (3).



Literature Cited

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Fuller, A.S., George, J.C. 1977. Evaluation of subsistence harvest data from the North Slope Borough 1993 census for eight North Slope villages: for the calendar year 1992. North Slope Borough Department of Wildlife Management: 152 pp.

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Bream, N.M. 2017. Revised options for amounts reasonably necessary for subsistence uses of the Teshekpuk caribou herd. Alaska Department of Fish and Game Division of Subsistence, Special Publication No. BOG 2017-02, Fairbanks.



Submitted By
Frank Noska
Submitted On
2/20/2020 3:08:26 PM
Affiliation

Phone
907-841-7372
Email
franknoska67@gmail.com
Address
PO BOX 872025
Wasilla, Alaska 99687

Proposal 49

I am against Proposal 49. Crossbows are not anything like hand held bows. They should not be included in any regular archery season. I have nothing against crossbows, I just feel they need to hunt in regular seasons, since the crossbow has nothing in common with the primitive weapon hand held bow. Archery seasons were never meant to allow crossbows. Frank Noska

Submitted By
Frank Noska
Submitted On
2/20/2020 3:18:25 PM
Affiliation

Phone
907-841-7372
Email
franknoska67@gmail.com
Address
PO BOX 872025
Wasilla, Alaska 99687

Proposal 50

I am in favor of Proposal 50. Having a 10 day archery moose season following the regular moose season will have a MINIMAL impact or affect on the species. It would allow a few archery hunters a chance to stay in the field 10 days longer to try and fill their bag limit. Archery hunting is considerably more difficult and has a much lower success than regular rifle hunting. This extra 10 days would give archery hunters more time to hunt. Even with this 10 day extension, archery hunters will always have a much lower percentage of success than their rifle hunting partners. I think this proposal is a great idea and makes a lot of sense. Thank you. Frank Noska

Submitted By
Frank Noska
Submitted On
2/20/2020 3:32:58 PM
Affiliation

Phone
907-841-7372
Email
franknoska67@gmail.com
Address
PO BOX 872025
Wasilla, Alaska 99687

Proposal 53

I am in favor of Proposal 53. Having an Archery registration sheep season 9 days before the regular sheep season will have a MINIMAL impact and effect on the sheep population. The archery sheep hunting success is always extremely low. Allowing archery hunters to hunt a few days before the regular sheep season would give them a chance to hunt undisturbed sheep, which a bowhunter needs to raise his chance of success. There is so little archery sheep hunting to begin with, adopting this proposal would have little or no effect on the sheep population. It would however, allow the few archery hunters that hunt sheep a small advantage by getting in the field before the rifle hunters. Nearly all western states in the lower 48 have archery seasons that begin before the regular and general seasons for these obvious reasons. I think Alaska should adopt the same principal. And also, with this being a registration hunt, ADF&G will be able to closely monitor the participation and success percentage of this hunt. Thank you for your time and consideration. Frank Noska



Submitted By
Patricia OBrien
Submitted On
2/19/2020 7:08:31 AM
Affiliation
Alaska citizen

Phone
907 789-9405
Email
patriciaobrien@gci.net
Address
PO Box 35451
Juneau, Alaska 99803

As an Alaskan since 1968 I have been watching this issue for a long time. Tourism is critical to our economy and wolf sightings are high value. It is time for you to support this repeated proposal in variations for decades. It is the wish of the majority of Alaskans.

Support Proposal 152, Closure option 1.

1. Proposal 152 is NOT an attempt to expand the park and this is NOT an issue of federal overreach. We are asking, as Alaskan citizens, that the Board of Game honor its mandates to manage for all Alaskans, including non-consumptive users. This is an attempt to reduce the risk on wolves that venture onto state lands, **during those weeks and months from February until summer, when research finds they are consolidating their family groups, mating, and establishing territories, and when the death of a breeding wolf is most damaging to the integrity of the pack.**
2. **Approving this proposal is well within the interests and mandates of the Board of Game**
 1. **Statewide policy recognizes both consumptive and non-consumptive management options.**

“...ADF&G will manage wolf populations to provide for human uses and to ensure that wolves remain an integral part of Interior Alaska’s ecosystems. Compatible human uses include hunting and trapping (both for personal use and commercial sale of furs), photography, viewing, listening, and scientific and educational purposes (ADF&G 2002). The aesthetic value of being aware of or observing wolves in their natural environment is also recognized as an important human use of wolves. We also recognize that integral to wolf management is the premise that wolf populations are renewable resources that can be harvested and manipulated to enhance human uses of other resources. Management may include both the manipulation of wolf population size and total protection of wolves from human influence...”
Species Management Report and Plan ADFG/DWC/SMR&P – 2018-30
 2. The Denali region, and specifically the Stampede townships, are by history, science and public opinion the **ideal state lands on which to practice non-consumptive use of wolves.** Furthermore, there is nothing in the Board of Game policies that prevents managing at a sub-population level.
3. **This is not a subsistence issue.** Wolf hunting and trapping in the area identified for closure in Stampede lands does not satisfy the eight criteria for Customary and Traditional Use (5 AAC 99.010).
4. In Alaska, wolves are among the most desired species for viewing, and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing. More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park.
5. From 2000 to 2010, the Alaska Board of Game (BOG) approved the closure of certain areas adjacent in the Stampede Corridor to the park boundary to wolf hunting and trapping year-round in order to protect wolf viewing opportunities in the park. In 2010, members of the BOG **removed the buffer** protections and requested more information and research into the relationship between hunting of wolves in the Stampede corridor and wolf sightings within Denali National Park Service and Preserve (DNPP) (“Unit 20C Wolf Closure Proposals” 2010). In September 2010, the National Park Service, with collaboration from the Alaska Department of Fish and Game embarked on a 5-year study of the relationship of wolf harvest adjacent to the park boundaries on wolf population and pack dynamics and on wolf viewing opportunities (Borg 2015).

Based on this research, Denali National Park found that **the presence of the no-trapping and hunting buffer zone during 2000-2010 was associated with increased wolf sightings in Denali National Park** compared to 2011-2013 and 1997-2000 (Borg et al 2016). Both the wolf population size and an index measuring the number of wolves denning near the park road, which were strongly associated with increased wolf sightings, were also greater during the period when the buffer zone was in place. Thus, the presence of the buffer may have increased local population size and the likelihood that wolves would den near the park road.

6. **Non-consumptive users are Wildlife viewing also brings an important socio-economic benefit to the state of Alaska,** with



7. The average number of people hunting and trapping wolves in the proposed closure **is less than two people per year over the last 20 years**. Those average two individuals would only lose 29% of their access to wolf hunting and 50% of their access to wolf trapping (in days) in this area. It is important to note that wolf hunting and trapping opportunities are still available in surrounding game units— this would not preclude people from trapping anywhere else outside this small area during the breeding season. The impact on trappers is extremely minimal. Annually, well **over 400,000 people visit DNPP** (Fix, Ackerman & Fay 2012).
8. When it existed, the old buffer did not decrease the average annual number of wolves hunted or trapped in UCUs overlapping the Stampede Corridor (UCUs 502, 605, 607), in fact wolf take was higher during the years the buffer was in place (Alaska Department of Fish & Game 2013). During the presence of the buffer zone, hunting and trapping of wolves adjacent to DNPP was on average greater than during the period without the presence of the buffer zone. Simultaneously, the buffer was associated with substantially increased wolf sightings (Borg et al 2016).
9. We recognize that this proposal does not remove all risks to wolves. However, given the almost unlimited take authorized under current Fish and Game hunting/trapping regulations, those local wolves that are most viewed and studied **remain vulnerable to disruption and possible complete loss of the pack**.
10. This proposal does not assert a biological emergency or population-level crisis. It is meant to **prevent disruption of wolf packs during late winter and spring**, making it more likely that their denning activities inside the National Park are completed successfully.
11. **We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. Opportunity for both consumptive and non-consumptive users is provided within this proposal.**



IN REPLY REFER TO:

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

OSM 19096.PM

Mr. Ted Spraker, Chairman
ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 17-20, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Western Arctic/Western Region. We have reviewed the 43 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle,
Acting Assistant Regional Director

Enclosure



Chairman Spraker

2

cc: Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Karen Deatherage, Council Coordinator, Office of Subsistence Management
Zachary Stevenson, Office of Subsistence Management
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Western Arctic/Western Region

January 17-20, 2020

Nome, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 7 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the opening date for the registration moose hunt, RM615 in Unit 18.

Current Federal Regulations:

Unit 18—Moose

Unit 18 – that portion east of a line running from the mouth of the Ishkowiak River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W 162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage—1 antlered bull by State registration permit; quotas will be announced annually by the Yukon Delta National Wildlife Refuge Manager

Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmaultauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP20-35 requests establishing a may-be-announced season between Dec. 1-Jan. 31. Wildlife Closure Review WCR20-38 analyzes the current closure to non-Federally qualified users and some Federally qualified subsistence users in the lower Kuskokwim hunt area.

Impact to Federal subsistence users/wildlife: As this hunt has a quota, which is usually met, no impact on the moose population is expected from this proposal. Federally qualified subsistence users could benefit from the season opening later in Zone 1 as cooler temperatures would facilitate proper meat care. They could still hunt on Federal public lands beginning Sept. 1. Desire for a later moose hunt due to warm weather in early September inhibiting proper meat care has been expressed at Yukon-Kuskokwim Delta Subsistence Regional Advisory Council meetings.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist for this proposal. It will increase harvest opportunity for Federally qualified subsistence users by providing a season when conditions better facilitate proper meat care.



PROPOSAL 8 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend resident season for moose hunting in Unit 18 Remainder.

Current Federal Regulations:

Unit 18—Moose

*Unit 18, remainder - 2 moose, only one of which may be antlered. Aug. 1-Apr. 30.
Antlered bulls may not be harvested from Oct. 1 through Nov. 30*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Extending the State season would likely result in additional harvest of moose. Given the high density of moose in this hunt area and the targeted harvest of cows, this population can withstand additional harvest. Additional harvest may help slow population growth and benefit long-term harvest and the moose population, which may be limited by density-dependent factors such as habitat.

Extending the State season to April 30 would align Federal and State regulations, decreasing regulatory complexity and user confusion. It would also increase harvest opportunity for Federally qualified subsistence users, who would no longer need to distinguish between State and Federal lands while hunting moose in Unit 18, remainder.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist given the high moose densities in this hunt area. Extending the season increases opportunity for Federally qualified subsistence users and aligns State and Federal seasons.

PROPOSAL 9 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the hunting season and bag limit for moose in Unit 18.

Current Federal Regulations:

Unit 18—Moose

*Unit 18--Goodnews River drainage and south to the Unit 18 boundary—1 Sep. 1 – 30
antlered bull by State registration permit*

Or



1 moose by State registration permit

A season may be announced between Dec. 1 and the last day of Feb.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: As this hunt has a quota, which is usually not met, minimal impact on the moose population is expected from this proposal. Lengthening the may-be-announced season to increase access may result in harvest meeting the quota, which would still be within sustainable levels. Lengthening the season to facilitate access due to inconsistent snow and weather conditions would increase harvest opportunity and likely harvest success for Federally qualified subsistence users. The proposed State season is a month longer than the current Federal season, precluding a Federal subsistence priority.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist and harvest opportunity for Federally qualified subsistence users would increase.

PROPOSAL 10 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 18.

Current Federal Regulations:

Unit 18—Moose

Unit 18—Goodnews River drainage and south to the Unit 18 boundary—1 antlered bull by State registration permit

Sep. 1 – 30

Or

1 moose by State registration permit

A season may be announced between Dec. 1 and the last day of Feb.

Unit 18, remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30

Aug. 1 – Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: Cow moose harvest is warranted in Unit 18 remainder due to high population density and signs that the population may be reaching carrying capacity and limited by density dependent factors such as habitat. A quota system prevents overharvest in the Goodnews River hunt area, although harvest during the winter season has historically been low. Allowance of cow moose harvest increases harvest opportunity for Federally qualified subsistence users and maintains alignment between State and Federal harvest limits. Changing the harvest limit to *Up to 2* moose provides management flexibility. However, if the Alaska Department of Fish and Game (ADF&G) changes the State harvest limit in-season, Federally qualified subsistence users would still be able to harvest two moose on Federal public lands under Federal regulations.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist due to high moose densities and historically low harvests. Additionally, harvest is managed via a quota and delegated authority, which protects against overharvest. Reauthorizing antlerless moose harvest increases harvest opportunity for Federally qualified subsistence users.

PROPOSAL 14 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the bag limit for ptarmigan in Unit 18.

Current Federal Regulation:

Unit 18 – Ptarmigan (Rock and Willow)

15 per day, 30 in possession

Aug. 10–May 30

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in alignment of State and Federal regulations, which will decrease regulatory complexity, user confusion, and law enforcement concerns.

There are no current population surveys being conducted for ptarmigan in Unit 18. However, ADF&G staff observations near Bethel and Dillingham suggest that ptarmigan populations in this area may be much lower than in the past. Part of this decline is thought to be caused by warmer weather in the area and little or no snow in recent years, which would help to camouflage these birds and provide cover.

It is unknown what effect current harvest is having on the ptarmigan population in Unit 18. Although the general consensus of biologists in Unit 18 is that the ptarmigan population is declining due to climatic changes, it is uncertain what the cumulative effects caused by additional mortality due to harvest may be. It is possible that more than a 15% harvest may have additive impacts to the population. Without an estimate of ptarmigan populations in Unit 18, it is not possible to predict the impacts caused by current harvest levels.



Federal Position/Recommended Action: The OSM position is to **support** this proposal.

Rationale for comment: Local residents indicate that willow ptarmigan numbers are declining in Unit 18. Although it is expected that this decrease is likely caused by climatic changes impacting levels of natural predation over the last few years, human harvest could have an additive effect on the already declining population. It may be important to limit harvest until ptarmigan numbers rebound to maintain this resource for local users.

PROPOSAL 15 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Address customary and traditional use findings for Alaska hares in Unit 18 and modify the season and bag limits.

Current Federal Regulations:

Unit 18 – Hare

No limit.

July 1–June 30

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Although Proposal WP20-20 addresses Unit 9, the request is similar and the conservation concern for Arctic hare populations is the same throughout their range, which includes Units 18 and 22. Proposal WP20-30 requests that the hare season be shortened from year-round to Nov. 1-Jan. 31 and the harvest limit be reduced from no limit to 1 per day and 4 annually for Unit 9. OSM’s preliminary conclusion is replace the term “tundra” hare with “Arctic hare” and to support the shortened season and lower harvest limit. This change, if adopted by the Federal Subsistence Board (Board), would reduce regulatory complexity by aligning Federal regulation with the recently changed State regulation.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, there would be little to no impact on Federal qualified subsistence users but it would reduce hunting pressure on declining populations of Arctic hare (*Lepus othus*) in Unit 18. For the proposed changes to the State regulations to be more effective, similar regulations would be needed for Federal Subsistence regulations in Units 9, Unit 18, and Unit 22. Since Federal regulations currently do not distinguish between the two species of hares that occur in Alaska (snowshoe hare (*Lepus americanus*) and the Arctic hare (*Lepus othus*)), new regulations, specifically for the Arctic hare, would need to be developed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Arctic hares were once abundant in Unit 18 and now occur at low densities. Although little is known about the Arctic hare populations in the Alaska Peninsula, the decrease may be related to habitat changes and/or predation. Reducing hunting pressure by lowering the harvest limits and shortening the harvest season will help address some conservation concerns for local populations of Arctic hares in Unit 18.



PROPOSAL 16 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the hunting season for brown bear from May 30 to June 30 in Unit 18.

Current Federal Regulation

Unit 18— Brown Bear

One bear by a State registration permit

Sep. 1 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: These changes may benefit Federally qualified subsistence users, who would be able to harvest a brown bear during an extended season under State regulations. However, this change would result in State regulations being more liberal than Federal regulations.

From 2012 to 2018 participation and success by local subsistence hunters was low. The harvest rate from 2012 to 2014 was approximately 6% of the estimated population, which is near the upper limit for brown bears. The harvest ratio was 70% male and 30% female, which is considered sustainable.

Federal Position/Recommended Action: The OSM recommendation is **neutral**.

Rationale: The proponent’s request includes the addition of a month to the end of the brown bear season. Brown bears are attracted to black bear bait stations, which close on June 30, and they could become more vulnerable if the brown bear season coincides with the end of the black bear baiting season. The current harvest rate is sustainable but near the upper limit for the species.

PROPOSAL 18 – 5 AAC 92.210. Game as animal food or bait. Allow the use of game bird wings and backs to be used for trapping bait in Unit 18 as follows:

Current Federal Regulations:

§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:

(i) The hide, skin, viscera, head, or bones of wildlife;

(ii) The skinned carcass of a furbearer;



(iii) Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;

(iv) Unclassified wildlife.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

PROPOSAL 19 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a year-round, resident season for caribou bull harvest in Unit 23.

Current Federal Regulations:

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 14

Feb. 1–June 30



Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14. July 15–Apr. 30

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14. July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposals WP20-43, WP20-45, and WP20-46 request the same changes as State Proposals 19 and 20.

Impact to Federal subsistence users/wildlife: Eliminating the bull closure would allow harvest of young bulls, which could reduce harvest pressure on cows, helping to grow the herd and increase harvest opportunity for Federally qualified subsistence users. As the timing of the fall caribou migration has changed in recent years, it would also provide more harvest flexibility by alleviating pressure on Federally qualified subsistence users to harvest caribou during a particular timeframe. While the risk of harvesting a bull in rut exists, Federally qualified subsistence users have been selectively harvesting bulls before the closure was adopted in 2016.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Adopting Proposal 19 increases harvest opportunity for Federally qualified subsistence users. Eliminating the bull closure may help grow the Western Arctic Caribou herd by reducing harvest pressure on cows.

PROPOSAL 20 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a year-round, resident season for caribou bull harvest in Unit 23.

See comments for Proposal 19.



PROPOSAL 21 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Reduce the bag limit for caribou in Unit 23.

Current Federal Regulations:

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 14

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.

July 15–Apr. 30

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.

July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While reducing cow caribou harvest could aid in the recovery of the Western Arctic herd, it is unclear how much effect this proposal would have on cow caribou conservation and herd recovery. Enforcement of this regulation would also be difficult.

Fall caribou harvest is critical in fulfilling subsistence needs in Unit 23. Currently, there is a bull closure from Oct. 15-Jan. 31. As caribou are migrating later in the year, subsistence users are shifting fall harvest



to coincide with when caribou are accessible from major rivers. Adopting Proposal 21 could result in subsistence users being unable to meet their needs if they are limited to only five caribou during the cow-only season when caribou are migrating through accessible areas.

The RC907 registration permit requirement was recently adopted in State and Federal regulations. Federally qualified subsistence users should have time to adjust to this permit requirement before additional permit restrictions are implemented.

Adopting this proposal would misalign Federal and State harvest limits for caribou in Unit 23. Federally qualified subsistence users would be able to harvest more than 25 caribou, including five cows on Federal public lands in Unit 23. However, a similar situation already exists in Unit 22. While State regulations limit caribou harvest to 20 caribou total in Unit 22, Federal regulations do not have an annual limit, so Federally qualified subsistence users could harvest more than 20 caribou on Federal public lands in Unit 22.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: This proposal would have limited conservation benefits to the Western Arctic herd and would burden Federally qualified subsistence users with additional regulatory requirements. State and Federal harvest limits would be misaligned if this proposal is adopted.

PROPOSAL 22 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Extend the season for taking cow caribou in Unit 23 Remainder.

Current Federal Regulations:

Unit 23—Caribou

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.

July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed



to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would increase cow harvest when pregnant cows are migrating to their calving grounds, potentially decreasing calf production and recruitment, as well as adult cow survival. While the herd may have stabilized or even increased, conservative management is still warranted, especially of cow caribou, whose survival has the biggest impact on herd trajectory and recovery. The bull caribou season is open during this time period, providing harvest opportunity.

This proposal would also result in Federal regulations being more restrictive than State regulations, precluding a Federal subsistence priority. While an extended State season would provide more harvest opportunity for Federally qualified subsistence users, misalignment of State and Federal caribou seasons could result in user confusion, especially in National Parks and the Federal public lands closure around Noatak where only Federal regulations apply.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Conservative management of the Western Arctic herd is warranted given its recent decline and lack of recent population estimates. Cow caribou survival has the greatest impact on herd conservation and trajectory. While this proposal would increase harvest opportunity for Federally qualified subsistence users, the bull season is currently open during this time period. Adopting this proposal would also misalign State and Federal seasons.

PROPOSAL 25 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Remove the restriction on caribou calf harvest in Unit 23.

See comments for Proposal 24.

PROPOSAL 28 – 5 AAC 85.025(g). Hunting seasons and bag limits for caribou. Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope resident hunters.

Current Federal Regulation:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports



(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: According to the proponent, the Department of Wildlife Management (DWM) travelled to all the North Slope communities and the residents overwhelmingly supported the collection of harvest data by DWM rather than by the use of State harvest ticket or registration permits. In addition, the information collected from RC907 duplicates information required by the North Slope Borough Department of Wildlife Management.

To assess the impact of harvest on Western Arctic, Teshekpuk, and Central Arctic caribou populations, accurate harvest information on location, date of harvest, and sex is needed. Detailed harvest information has not been readily available from the DWM in recent years. Accurate harvest information is critical to the proper management of caribou populations in this region.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Harvest reports are an important management tool that provides valuable information to aid caribou population management decisions. To address the effects of hunting pressure and changes to State and Federal regulations on North Slope caribou populations, accurate harvest information on location, number, date of harvest, and sex is needed. To date, detailed harvest data has not been available.

PROPOSAL 29 – 5 AAC 85.045(11). Hunting seasons and bag limits for brown bear.

5 AAC 92.132. Bag limit for brown bears. Increase the resident bag limit for brown bears in Unit 26A.

Current Federal Regulations:

Unit 13—Brown Bear

Unit 26A—1 bear by State subsistence registration permit only.

July 1-June 20.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

In 2014, the brown bear population in Unit 26A appeared to be stable to increasing. However, there have been no density estimates or information on brown bear population trends since 2014. From 2000-2013, an average of 23-30 brown bears were take annually in Unit 26A. This includes an estimated 6-12 bears



that are not reported each year. As of 2014, ADF&G believes that this level of harvest was sustainable based on density estimates.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest brown bear in Unit 26A. However, updated population information on this species is recommended before the harvest limit is increased to two bears every regulatory year.

PROPOSAL 31 – 5 AAC 85.050. Hunting seasons and bag limits for muskoxen. Establish a registration permit hunt for muskoxen in Units 21D, 22A, and 24D.

Current Federal Regulation:

Unit 21D – Muskox	<i>No Federal Open Season</i>
Unit 22A – Muskox	<i>No Federal Open Season</i>
Unit 24D – Muskox	<i>No Federal Open Season</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Muskox were reintroduced to Units 22C and 22D of the Seward Peninsula in 1970, and have since expanded their range to the north and east. Currently, muskox occupy suitable habitat in Units 22A, 22B West, 22C, 22D, 22E, and 23-Southwest. Limited harvest of this population is permitted in Units 22B, 22C, 22D, 22E, and 23 under either State or Federal regulations. A majority of the Federal public lands in these areas are closed to the taking of muskox except by Federally qualified subsistence users, due to the low muskox population in the region.

Although the muskox population experienced periods of growth between 1970 and 2010, the Seward Peninsula muskox population began to decline in 2010. Between 2010 and 2012 the muskox population declined 12.5% annually throughout the Seward Peninsula. Recent research suggested that selective harvest of mature bulls on the Seward Peninsula could be a driver of reduced population growth and that



annual harvest be restricted to less than 10% of the estimated number of mature bulls. Following this change in harvest strategy, the Seward Peninsula muskox population remained stable through 2017, but populations still remain lower than in the past. Increasing harvest of this population could lead to another decline in the overall population of muskox in this region.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: In addition to direct mortality due to harvest, muskox survival could be susceptible to herd disturbances during winter months if caloric expenditures are too high. Harvest on the Seward Peninsula was reevaluated and reduced in 2012 due to a declining muskox population. Recently, some localized populations have experienced a slight increase or have remained stable, but they still remain at much lower numbers than in the past. Current harvest strategies should remain in place to ensure that these muskox populations have the opportunity to reach healthy levels.

PROPOSAL 32 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E.

Current Federal Regulations:

Unit 22E—Caribou

<i>Units 22A—that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E—that portion east of and including the Tin Creek drainage—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30</i>
<i>Units 22C, 22D remainder, 22E remainder—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30, season may be announced</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase harvest opportunity for Federally qualified subsistence users hunting between the Sanaguich and Nuluk River drainages. Federal and State hunt areas in Unit 22E are currently misaligned and would remain misaligned if this proposal is adopted. Federal regulations would become slightly more restrictive than State regulations since the season for the area between the Tin Creek and Nuluk River drainages would still be may-be-announced under Federal regulations. However, Federally qualified subsistence users would still be able to harvest caribou on Federal public lands in this area under State regulations. No conservation concerns exist for this proposal as the primary reason western Unit 22E has a may-be-announced caribou season is to protect reindeer.



Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: There are no conservation concerns for this proposal, and it would increase harvest opportunity for Federally qualified subsistence users. State and Federal hunt area boundaries are currently misaligned and would remain misaligned if this proposal is adopted.

PROPOSAL 33 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify hunting seasons and require a registration permit for moose hunting in Unit 22D Remainder.

Current Federal Regulation:

Unit 22D – Moose

<i>Unit 22D remainder—1 bull</i>	<i>Aug. 10–Sept. 14</i>
	<i>Oct. 1–Nov. 30</i>
<i>Unit 22D remainder—1 moose; however, no person may take a calf or a cow accompanied by a calf</i>	<i>Dec. 1–31</i>
<i>Unit 22D remainder—1 antlered bull</i>	<i>Jan. 1–31</i>

Is a similar issue being addressed by the Federal Subsistence Board? Yes

Impact to Federal subsistence users/wildlife: This proposal would mostly align with Proposal WP20-38 that was submitted to the Board and will be considered at the Board’s April 2020 meeting.

The moose population in Unit 22D remainder is currently below State management goals and has been declining at a rate of 14% annually since 2011. The current estimated annual harvest may be above sustainable levels. Due to the declining population, the State removed antlerless hunts from their regulations in Unit 22 and eliminated non-resident harvest opportunity in the area. Requiring a registration permit will help to obtain more accurate harvest data, which is necessary to properly manage the species.

Fall composition surveys indicate a negative change in the composition within Unit 22D remainder. Results from 2016 and 2018 surveys showed a bull:cow ratio of 23 and 18 bulls:100 cows, respectively, both of which are below the State management objective of 30 bulls: 100 cows. Due to the vulnerability of rutting bulls, the removal of the October and November season may be beneficial to the stabilization of this moose population.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: If this proposal is adopted, it would limit subsistence opportunity for Federally qualified subsistence users in Unit 22D remainder, but it would also help to ensure that users have the



moose resource available for future generations. Requiring a registration permit would put more of a burden on users, but it would provide more accurate tracking of moose harvest in the hunt area.

PROPOSAL 35 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting with an option to require a registration permit for the Unit 22D Remainder hunt.

Current Federal Regulation:

Unit 22 – Moose

Unit 22A—that portion north of and including the Tagoomenik and Shaktoolik River drainages—1 bull. Federal public lands are closed to hunting except by federally qualified users hunting under these regulations Aug. 1–Sep. 30.

Unit 22A—that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of the Tagoomenik and Shaktoolik River drainages—Federal public lands are closed to the taking of moose, except that residents of Unalakleet, hunting under these regulations, may take 1 bull by Federal registration permit, administered by the BLM Anchorage Field Office with the authority to close the season in consultation with ADF&G Aug. 15–Sep. 14.

Unit 22A, remainder—1 bull. However, during the period Jan.1-Feb. 15, only an antlered bull may be taken. Federal public lands are closed to the taking of moose except by federally qualified subsistence users Aug. 1–Sep. 30.
Jan. 1–Feb. 15.

Unit 22B—west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations Sep. 1–14.

Unit 22B—west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS, and ADF&G. Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations Jan. 1–31.

Unit 22B, remainder—1 bull Aug. 1–Jan. 31.



Unit 22C—1 antlered bull Sep. 1–14.

Unit 22D—that portion within the Kougarok, Kuzitrin, and Pilgrim River drainages—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by residents of Units 22D and 22C hunting under these regulations Sep. 1–14.

Unit 22D—that portion west of the Tisuk River drainage and Canyon Creek—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G Sep. 1–14.

Unit 22D—that portion west of the Tisuk River drainage and Canyon Creek—1 bull by Federal registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by residents of Units 22D and 22C hunting under these regulations Dec. 1–31.

Unit 22D, remainder—1 bull Aug. 10–Sep. 14.
Oct. 1–Nov. 30.

Unit 22D, remainder—1 moose; however, no person may take a calf or a cow accompanied by a calf Dec. 1–31.

Unit 22D, remainder—1 antlered bull Jan. 1–31.

Unit 22E—1 antlered bull. Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations Aug. 1–Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in local priority for users residing within Unit 22, by making nonlocal users travel to the region in July to obtain their permits.

Federal public lands in many portions of Unit 22 are currently closed to the harvest of moose except by Federally qualified subsistence users, due to low moose populations throughout the region. This proposal would increase opportunity for local users, by limiting competition near villages. This proposal may also decrease overall harvest, thus allowing the moose populations to increase and protecting this important resource into the future.



Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: Moose populations are low in many portions of Unit 22. This proposal would provide increased opportunity for local Federally qualified subsistence users throughout Unit 22 by limiting competition with non-local users.

PROPOSAL 36 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting.

See comments for Proposal 35.

PROPOSAL 41 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the season dates for brown bear hunting in Unit 22B and 22C.

Current Federal Regulation:

Unit 22 – Brown Bear

Unit 22B—2 bears by State registration permit only. Aug. 1–May 31

*Unit 22C—1 bear by State registration permit only. Aug. 1–Oct. 31
Apr. 1–May 31*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations and registration permit seasons, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Although there are no current population estimates for the area, the current brown bear population appears to be healthy and productive. Current harvest levels within Units 22C and 22B are currently within State management goals.

Although harvest in Unit 22C increased by 87% from 2014 to 2015 with a previous liberalization of regulations, the population appears to be healthy throughout the unit. Federal public lands make up a negligible fraction of the total land area of Unit 22C, so the proposed regulation is unlikely to impact Federally qualified subsistence users hunting on Federal public lands. This proposal could, however, provide local users with an increased opportunity to harvest brown bear on State managed lands under State regulations.

This proposal would allow for harvest of brown bear during the time of year when these animals have used the majority of their winter fat reserves. Brown bears are rarely hunted by locals during this time of year when the bears are considered lean and their hides are of lesser quality. Therefore, this would not be a time of year when brown bears are typically harvested for subsistence purposes.



Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: If this proposal is adopted, it would misalign State and Federal regulations which could lead to user confusion in the area. This proposal would also extend the harvest season into a time of year when Federally qualified subsistence users do not typically harvest brown bear for subsistence uses, however it could still provide additional opportunity for users if needed.

PROPOSAL 43 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Address customary and traditional use findings for Alaska hares in Unit 22 and modify the season and bag limits.

See Proposal 15.



United States Department of the Interior



PC120
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U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503

In Reply Refer to:
FWS/IR11/20008

FEB 21 2020

Mr. Ted Spraker, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The Alaska Board of Game (Board) is scheduled to meet March 6-14, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Interior and Eastern Arctic Regions. We have reviewed the 123 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle
Acting Assistant Regional Director

Enclosure



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Interior and Eastern Arctic Region

March 6-14, 2020

Fairbanks, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 45 – 5 AAC 92.080(15). Unlawful methods of taking game; exceptions. Prohibit the use of moose, caribou and reindeer urine as scent lures in the Interior and Eastern Arctic Region.

Current Federal Regulations:

§ __.25(a) *Definitions.* The following definitions apply to all regulations contained in this part:

Scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal could benefit wildlife populations by preventing the infection and spread of chronic wasting disease (CWD). While CWD has not been detected in Alaska, preventing disease is much easier than mitigating its spread once detected. This proposal could burden subsistence users who would no longer be able to use moose, caribou, or reindeer urine as a scent lure.

Of note, the definition for scent lure under Federal regulations pertains only to bear baiting and contains no prohibition on any cervid urine. As such, cervid urine can be used as a scent lure under Federal regulations.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: OSM supports preventing the transmission of disease to maintain healthy wildlife populations. However, to be truly effective, a similar proposal needs to be submitted to the Federal Subsistence Board.

PROPOSAL 58 – 5 AAC 92.540(x). Controlled use areas. Establish a Controlled Use Area for the Kaiyuh Flats area in Unit 21D.

Current Federal Regulations: None.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It is unclear in the proposal whether or not the proponent intends for the controlled use area (CUA) to apply only to the RM831 hunt as suggested by the submitted map or to apply to all hunts within the Kaiyuh Flats hunt area of Unit 21D. (The proposal also refers to RM833, which is in Unit 24). If the CUA applies only to the RM831 winter hunt, no effects to the moose population are expected because the RM831 hunt has a quota. If the CUA applies to both fall and winter hunts, the CUA could benefit the moose population by decreasing bull harvest during the fall hunt in the



northern portion of the hunt area where bull:cow ratios are very low. However, as most users access this area by boat, the benefits to the moose population would likely be minimal.

Decreased competition from non-local users accessing the hunt area by aircraft would benefit Federally qualified subsistence users. Additionally, if non-local hunters using aircraft are harvesting moose during the RM831 hunt, excluding them from this hunt would make more moose available to Federally qualified subsistence users before the quota is met. However, as the RM831 hunt only began in 2019, patterns of use such as who (local v. non-local) is primarily harvesting and what their form of access is (boat v. plane) are likely not yet established. Therefore, this CUA might be premature. If this proposal is adopted, Federally qualified subsistence users would still be able to access Federal public lands within the hunt area by aircraft under Federal regulations.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: It is unclear to which hunts the CUA would apply. The RM831 is a very new hunt. More time may be needed to establish harvest patterns. OSM is not aware of how quickly the 2019 quotas was met. If quotas are not being met, OSM does not support the CUA since it could be detrimental to the sustainable growth of the moose population. If quotas are being met, OSM supports establishment of the CUA to provide more opportunity for Federally qualified subsistence users.

PROPOSAL 59 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the winter, any-moose season for residents in Unit 21D.

Current Federal Regulations:

Unit 21D—Moose

Unit 21D, remainder—1 moose; however, antlerless moose may be taken only during Aug. 22-31. Sep. 21-25 and the Mar. 1-5 season if authorized jointly by the Koyukuk/Nowitna National Wildlife Refuge Manager and the Central Yukon Field Office Manager, Sep. 5-25. Bureau of Land Management. Harvest of cow moose accompanied by calves is Mar. 1-5 season to be prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit is required. During the Mar. 1-5 season, a Federal registration permit is required. announced. Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Proposal WP20-36 requests establishing a 15-day March moose season in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State’s new Kala Slough hunt area), eliminating the March to be announced moose season in Unit 21D remainder, requiring a State registration permit in the Koyukuk



Controlled Use Area (Koyukuk CUA), and eliminating the March and April to be announced moose seasons in the Koyukuk CUA.

WP20-37 requests establishing a 15-day to-be-announced moose season between Dec. 1-31 and a 15-day may-be-announced season between Mar. 1-31 in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State’s new Kala Slough hunt area). The March season would be announced if the harvest quota is not met during the December hunt.

Impact to Federal subsistence users/wildlife: Bull:cow ratios in the northern portion of the hunt area are only 10 bulls:100 cows. The intent of the March hunt was to target cows, not bulls. Establishing a hunt in December before all bulls have dropped their antlers could encourage additional bull harvest, creating a conservation concern.

Providing a hunt in December rather than March provides Federally qualified subsistence users with an opportunity to harvest a moose to provide meat over the winter. However, due to warmer falls in recent years, travel conditions (adequate snow for snowmachine travel, freeze-up of rivers/lakes) during December are uncertain.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: OSM opposes this proposal as submitted due to conservation concerns over harvesting additional bulls in the northern portion of the hunt area where bull:cow ratios are very low. At their 2019 fall meeting, the Western Interior Alaska Subsistence Regional Advisory Council amended their Federal proposal, WP20-37 to exclude the area with very low bull:cow ratios during the December season. Given the complexity and interspersed of Federal and non-Federal lands in Unit 21D, OSM supports alignment of State and Federal regulations in this subunit, if possible, to alleviate user confusion and law enforcement concerns.

PROPOSAL 60 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose. Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21D—Moose

Unit 21D, remainder—1 moose; however, antlerless moose may be taken only during Aug. 22-31. Sep. 21-25 and the Mar. 1-5 season if authorized jointly by the Koyukuk/Nowitna National Wildlife Refuge Manager and the Central Yukon Field Office Manager, Sep. 5-25. Bureau of Land Management. Harvest of cow moose accompanied by calves is Mar. 1-5 season to be prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit announced. is required. During the Mar. 1-5 season, a Federal registration permit is required.



Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Proposal WP20-36 requests establishing a 15-day March moose season in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State’s new Kala Slough hunt area), eliminating the March to be announced moose season in Unit 21D remainder, requiring a State registration permit in the Koyukuk Controlled Use Area (Koyukuk CUA), and eliminating the March and April to be announced moose seasons in the Koyukuk CUA.

WP20-37 requests establishing a 15-day to-be-announced moose season between Dec. 1-31 and a 15-day may-be-announced season between Mar. 1-31 in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State’s new Kala Slough hunt area). The March season would be announced if the harvest quota is not met during the December hunt.

Impact to Federal subsistence users/wildlife: Given the rapid increase of the moose population in the Kaiyuh Flats area of Unit 21D, OSM supports the harvest of cow moose to provide additional harvest opportunity and to slow population growth to be more sustainable. Given very low bull:cow ratios (10 bulls:100 cows) in the northern part of the hunt area between Koyukuk and Galena, OSM supports targeting cows for this winter hunt.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no conservation concerns. Federally qualified subsistence users would benefit from additional harvest opportunity.

PROPOSAL 61 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend the resident moose season within the Kanuti Controlled Use Area of Unit 24B.

Current Federal Regulations:

Unit 24–Moose

Unit 24B, remainder—1 bull by State harvest ticket *Aug. 25-Oct. 1.*

OR

1 antlered bull by State registration permit *Dec. 15-Apr. 15.*

Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose, except by Federally



qualified subsistence users of Unit 24, Koyukuk, and Galena hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-20 analyzes the current closure to moose hunting in the Kanuti Controlled Use Area (Kanuti CUA) of Unit 24B, except by Federally qualified subsistence users.

Impact to Federal subsistence users/wildlife: Bull:cow ratios within the Kanuti CUA are high (75 bulls:100 cows in 2017) and can support additional harvest, indicating no conservation concerns for this proposal. Extending the resident fall season would benefit Federally qualified subsistence users by providing additional harvest opportunity on State managed lands. It would also reduce regulatory complexity and user confusion by aligning State and Federal fall seasons. Therefore, Federally qualified subsistence users would no longer need to differentiate between State and Federal lands, which can be difficult.

Due to aircraft restrictions and the Federal lands closure, moose harvest within the CUA is primarily by Federally qualified subsistence users. The Western Interior Alaska Subsistence Regional Advisory Council stated moose harvest has not met the subsistence needs of local communities in recent years. This proposal could help local communities meet their subsistence needs.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no conservation concerns due to high bull:cow ratios and low harvest pressure. Federally qualified subsistence users would benefit from increased harvest opportunity.

PROPOSAL 63 – 5 AAC 92.530(7). Management Areas. Repeal the Dalton Highway Corridor Management Area.

Current Federal Regulations:

§ Unit 24. Special Provisions

(ii)(A) You may not use firearms, snowmobiles, licensed highway vehicles, or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions Units 20, 24, 25, and 26 extending five miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakeaket, Analtuvuk pass, Bettles, Evansville, and Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.



Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: A repeal of the Dalton Highway Corridor Management Area (DHCMA) would have a significant impact on subsistence users living within the DHCMA and residents of Alatna, Allakeaket, Analtuvuk Pass, Bettles, Evansville, and Stevens Village, as they currently can use snowmobiles and firearms to take wildlife within the DHCMA. If this proposal is adopted, competition with other Alaska residents would increase and would likely result in lower success rates and decreased opportunity for local subsistence users.

Caribou populations from the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WCH), and the Central Arctic Caribou Herd (CACH) have ranges that overlap the DHCMA. Although the population dynamics differ between the three caribou populations, they all currently appear to be stable. Repeal of the DHCMA is not recommended as this would increase the disturbance from hunting pressure on caribou and other wildlife populations.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Repealing the DHCMA may create a conservation concern for caribou and other wildlife due to increased access and disturbance from snowmachines and firearms. Retaining the DHMCA allows caribou to move more freely with less disturbance during migration. Additionally, such a closure would have a limited impact as the DCMHA would still exist under Federal regulations.

PROPOSAL 66 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Extend the resident caribou season and reduce the bag limit for Unit 24A remainder.

Current Federal Regulations:

Unit 24—Caribou

*Units 24A remainder, 24B remainder—5 caribou per day as follows:
Calves may not be taken.*

Bulls may be harvested

*July 1-Oct. 10
Feb. 1-June 30*

Cows may be harvested

Oct. 1 – Feb. 1

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Caribou harvest in Unit 24A is dependent upon the migration patterns of the Central Arctic Caribou Herd (CACH), Western Arctic Caribou Herd (WACH), Porcupine Caribou Herd (PCH) and the Teshekpuk Caribou Herd (TCH). Harvests in the summer and



early fall in Unit 24A occur primarily from the PCH, TCH, or WACH and during fall and winter, near Wiseman and Coldfoot, from the CACH. Extending the season to May 15 is likely to have little impact on Federally qualified subsistence users since the calving areas for the four caribou herds do not occur in Unit 24A remainder. Reducing the limit from 10 caribou to 5 caribou in Unit 24A remainder may reduce opportunity for Federally qualified subsistence users to harvest enough caribou if caribou move through the area quickly during migration.

There would be no impact to caribou if this proposal was adopted.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: The calving areas of the four caribou herds mentioned previously do not occur in Unit 24A remainder, so extending the season to May 15 is likely to have little effect on the caribou populations. Reducing the caribou limit from 10 to 5 per day is not likely to have much impact on Federally qualified subsistence users as hunting, processing, and packing 5 caribou a day per hunter is time intensive.

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

Current Federal Regulations:

Unit 21 – Brown Bear

Unit 21C – 1 bear

Aug. 10–June 30.

*hunting over bait is not permitted for brown bear in this unit.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal could allow more opportunity for Federally qualified subsistence users to harvest brown bear.

Hunting brown bear over bait is currently permitted under State regulations in Unit 21C during a spring season. This spring season was adopted into State regulations via Proposal 92 in 2018. When the Board of Game considered Proposal 92, it was expressed by biologists that current harvest levels fall below the State management objective for minimum annual reported harvest in this unit and it is unlikely that allowing the use of bait would increase harvest to unsustainable levels. In neighboring units where bait sites are permitted (21D, 24C, and 24D), only two brown bear were reported harvested over bait between 2012 and 2016.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale for comment: While this proposal may increase opportunity for subsistence users, it would misalign Federal and State regulations which may lead to user confusion. This proposal is not expected



to substantially increase harvest, and therefore would not negatively impact the brown bear population in the area. Due to the isolated nature of Unit 21C and the lack of communities within the boundary, it is unlikely that fall bear baiting in this subunit would habituate brown bears to human use areas.

PROPOSAL 69 – 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 21C.

See comments for Proposal 68.

PROPOSAL 70 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Change the season start date for taking brown bear in Unit 24A to align with Unit 25A.

Current Federal Regulations:

Unit 24 – Brown Bear

1 bear by State registration permit

Aug. 10–June 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would misalign State and Federal regulations that use the same registration permit. This could cause user confusion and difficulty for law enforcement. Unit 25A only constitutes a very small portion of the Dalton Highway corridor, with the majority of the unit being isolated and far from the road system. This makes Unit 25A very different from Unit 24A, which is primarily characterized by the Dalton Highway corridor. Other surrounding units along the corridor (Units 26B and 20F) have brown bear harvest seasons that align with the current harvest season start date in Unit 24, which is August 10.

According to the ADF&G 2012–2014 Brown Bear Management Report, current harvest of brown bear in Unit 24 is below the minimum annual sustainable harvest. A majority of the harvest that takes place in Unit 24 is from the northern portion of the unit (sub-units 24A and 24B), with very few bears being harvested in the southern portion of the unit. This discrepancy in hunting pressure could lead to localized over-harvesting in Unit 24. Due to hunting restrictions within Gates of the Arctic National Park, a large area of brown bear habitat is protected that can support a high density of brown bears; this limits the possibility of over-harvest of the brown bear population in the northern section of Unit 24.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: Although the current reported harvest of brown bear in Unit 24 is below the minimum annual sustainable harvest, modifying the opening season date would misalign Federal and State regulations that use the same registration permit and would misalign brown bear harvest seasons along the Dalton Highway corridor. The portion of Unit 25A located within the Dalton Highway corridor region is minor compared to the rest of the corridor and is also not representative of the rest of Unit 25A,



which is much more isolated. Unit 24A is a highly trafficked area due to its vicinity to the Dalton Highway. Lengthening the season in 24A could lead to increased use of this area, which is characteristically much different than Unit 25A. However, it could be worth considering modifying the regulations for the Dalton Highway corridor section of 25A to match season dates in Unit 24A, 26B, and 20F.

PROPOSAL 73 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. 5 AAC 92.165. Sealing of bear skins and skulls. 5AAC 92.220. Salvage of game meat, furs, and hides. Eliminate the RB601 brown bear subsistence registration permit for Unit 21D and Unit 24A, B, C, & D.

Current Federal Regulations:

Unit 21 – Brown Bear

Unit 21D – 1 bear by State registration permit only *Aug. 10–June 30.*

Unit 24 – Brown Bear

1 bear by State registration permit *Aug. 10–June 30.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would remove the option for subsistence users to harvest brown bear without a sealing requirement under State regulations. Removal of the registration permit would cause discrepancies with Federal regulations that also require this permit.

According to the ADF&G registration hunt statistics, there are no current records available for this hunt. This may show that users are not currently hunting under these regulations or that harvest is minimal.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale for comment: If this proposal is adopted, it would remove an opportunity for subsistence users to harvest brown bear for human consumption without the need for sealing. Although the season and harvest limits are the same for the general hunt, we are not certain how many users prefer to use the registration permit subsistence hunt. If this permit hunt is eliminated, then a new Federal permit will need to be established in the Federal regulations.

PROPOSAL 78 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope residents.

Current Federal Regulations:



§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Requiring Federally qualified subsistence users residing north of the Yukon River to obtain a registration permit and submit reports when hunting caribou could be burdensome, especially for those residents living in very remote areas. According to the proponent, the North Slope Department of Wildlife Management (DWM) travelled to all the North Slope communities and the residents overwhelmingly supported the collection of harvest data by DWM rather than by the use of State harvest ticket or registration permits. In addition, the information collected from RC907 duplicates information required by the North Slope Borough Department of Wildlife Management.

However, to assess the impact of harvest on Western Arctic, Tespkpuk, and Central Arctic caribou populations, accurate harvest information on location, date of harvest, and sex is needed. Detailed harvest information has not been readily available from the DWM in recent years. Accurate harvest information is critical to the proper management of caribou populations in this region.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Accurate harvest information provides valuable information for the Federal and State biologists and managers to assess population trends and composition of North Slope caribou populations. To address the effects of hunting pressure and changes to State and Federal regulations on North Slope caribou populations, accurate harvest information on location, number, date of harvest and sex is needed. To date, detailed harvest data for these populations has not been available.

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

Current Federal Regulations:

Unit 26—Sheep

Unit 26C — 3 sheep per regulatory year; the Aug. 10-Sept. 20 season is restricted to 1 ram with 7/8 curl horn or larger. A Federal registration permit (FS2603) is required for the Oct. 1-Apr. 30 season. Aug. 1-Sept. 20
Oct. 1-Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife:

The opportunity for Federally qualified subsistence users to harvest a sheep may increase slightly from a change in hunt stipulations of RS595 to match RS380. However the proposed change in management may not be compatible with the State's full-curl management strategy.

The Eastern Brooks Range Sheep population includes a portion of Unit 24A within and east of Dalton Highway Management Corridor, Unit 25A, Unit 26B, and Unit 26C. Most of the Dall sheep habitat in Unit 26C is within the Arctic National Wildlife Refuge. Information from limited survey data and reports from hunters and guides suggest that there was a complete failure in lamb recruitment in 2013 and 2014 across the entire Eastern Brooks Range. In 2016 and 2017, staff from the Arctic National Wildlife Refuge estimated that the sheep population in the eastern two-thirds of the refuge in Unit 26C was 5,321 sheep. Although the results from these surveys are not directly comparable to previous surveys, the numbers appeared low compared to numbers seen during 2000-2010 (ANWR 2019). However, the abundance of lambs seen during the 2016 and 2017 surveys was good, suggesting that the population may be in recovery. Results from the 2018 surveys are still being analyzed.

The State has no management objective for population size or composition as their management strategy is based on the assumption that a full-curl harvest strategy allows for sustained hunter opportunity and harvest regardless of sheep abundance. This is based on the premise that success rate would decline when the abundance of legal rams declines. Participation and harvest by hunters using RS595 has been low from 2011/2012 to 2015/2016 with an annual harvest of 3 sheep (range 0-7). This harvest is very small compared to the annual reported sheep harvest of 70 sheep under the general hunt in Unit 26C.

Given the most recent sheep population and harvest data and the low participation and harvest in RS595 hunt, it is unlikely that the changes would have a significant negative effect on the sheep populations in Unit 26C.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** because there is no way to determine what the potential for increased participation and harvest would be if the current stipulations for RS595 were changed similar to those for RS380.

Rationale: Although the sheep population may be currently in the process of recovery, a potential increase in harvest is not recommended until the Eastern Brooks Range sheep population has fully recovered.

Literature Cited

Arctic National Wildlife Refuge (ANWR) 2019. Summary of activities on the Arctic National Wildlife Refuge – Report for the Eastern Interior and North Slope Regional Advisory Councils, October 2019. 20 pp.

PROPOSAL 95 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a resident winter moose hunt in Unit 19D East.



Current Federal Regulations:

Unit 19D–Moose

Unit 19D-that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork—1 antlered bull Sep. 1-30.

Unit 19D-remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sep. 1-30.
Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sep. 1-30.
Dec. 1-15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: The proponent refers to Unit 19D East, which is an intensive management area, but not a specific hunt area. Unit 19D East includes all of the Upper Kuskokwim Controlled Use Area (CUA) and portions of Unit 19D, remainder. For this proposal, OSM assumes the proponent intended the winter moose hunt to apply to both the Unit 19D, Upper Kuskokwim CUA and the Unit 19D, remainder hunt areas.

This proposal would provide additional harvest opportunity, benefiting Federally qualified subsistence users. Aircraft restrictions would alleviate potential competition from non-local hunters. The quota would ensure sustainable harvests. A proposal would need to be submitted to the Federal Subsistence Board to establish a similar hunt under Federal regulations.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no conservation concerns as the moose population Unit 19D has increased in recent years, meeting State management objectives. A quota would ensure sustainable harvests. A winter any-moose season would benefit Federally qualified subsistence users by providing additional harvest opportunity.

PROPOSAL 97 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Tier II permit hunt for moose in Unit 19A to a registration permit hunt.

Current Federal Regulations:



Unit 19A—Moose

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit.

Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-43 analyzes the current closure to moose hunting in the western portion of Unit 19A, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under Federal regulations.

Impact to Federal subsistence users/wildlife: Currently, reported harvest (~150 moose/year; 100 from Tier II permits and 50 from Federal permits) approximates the harvestable surplus (~160 moose/year) for this moose population. Additionally, low bull:cow ratios in 2016 and 2017 indicate few surplus bulls are available for harvest. If unlimited permits are distributed through a registration hunt, OSM supports establishing a quota to ensure sustainable harvests.

A registration permit would allow any Federally qualified subsistence user to obtain a permit and hunt on State managed lands. However, a registration permit could also increase competition from non-local hunters.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: While OSM does not have a preference on how permits are distributed for this hunt, OSM is concerned about the potential for overharvesting this moose population.

PROPOSAL 98 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Tier II permit hunt for moose in Unit 19A to a registration permit hunt.

[See comments for Proposal 97.](#)

PROPOSAL 99 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Tier II moose permit hunt (TM680) in Unit 19A to a household permit.



Current Federal Regulations:

Unit 19A—Moose

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-43 analyzes the current closure to moose hunting in the western portion of Unit 19A, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under Federal regulations.

Impact to Federal subsistence users/wildlife: Household permits would support traditional hunting practices and mentoring of the younger generation, which would benefit Federally qualified subsistence users. Hunting as a group would also increase safety. As the number of permits and harvest limit would remain the same, minimal increases in harvest are expected.

OSM suggests establishing a household permit hunt in addition to (rather instead of) a Tier II permit hunt may better accommodate all Federally qualified subsistence users. The number of permits would be the same, but divided between the two permitted hunts.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no conservation concerns, and this proposal would benefit Federally qualified subsistence users.

PROPOSAL 100 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend the resident season dates for moose hunting in Unit 19A Remainder.

Current Federal Regulations:



Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from (but excluding) the George River drainage, and south of the Kuskokwim River upstream from (and including) the Downey Creek drainage, not including the Lime Village Management Area. No Federal open season

Federal public lands are closed to the harvest of moose.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-39 analyzes the current closure to moose hunting in the eastern portion of Unit 19A to all users.

Impact to Federal subsistence users/wildlife: This is a very new and conservative hunt. Federal lands are currently closed to all moose hunting because of conservation concerns. The State hunt is limited by the number of permits distributed, but does not have a quota. If a longer season is established, the number of available permits would likely decrease because more hunters would be successful. The shorter season allows more permits to be distributed, but decreases individual hunters' success. No effects to the moose population are expected due to the various safeguards associated with this hunt.

A potential modification could be shifting the season later in the fall to correspond with cooler temperatures that facilitate proper meat care. More time may be needed to assess the success rates and impacts of this hunt. Currently, up to 75 permits can be distributed. If the harvestable surplus exceeds 75 moose, then OSM supports extending the season to increase success rates and opportunity. However, only 30 permits were issued for the 2019/20 regulatory year and, while conservative, indicates the moose population cannot currently withstand much more harvest.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal may benefit some Federally qualified subsistence users by providing a longer season, while being detrimental to other users who would not receive a permit.

PROPOSAL 102 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Shift the season dates for the Tier II moose permit hunt in Unit 19A.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked



Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-43 analyzes the current closure to moose hunting in the western portion of Unit 19A, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under Federal regulations.

Impact to Federal subsistence users/wildlife: No impacts to the moose population are expected from this proposal as season length would remain the same and ends before the height of rut, avoiding breeding disruptions. This proposal could benefit Federally qualified subsistence users by providing a season during better weather conditions, which would facilitate proper meat care.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: This proposal would benefit Federally qualified subsistence users by easing meat care in the field. There are no conservation concerns.

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

Current Federal Regulations:

Unit 21 – Moose

Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30. During the Feb. 15—Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: In 2016, moose population surveys showed that the population in 21E had increased since the 2012 surveys were conducted. This placed the population within the State management objectives for the unit. Bull:cow ratios also fell within management goals for the unit. Although Unit 21E is an intensive management area, as of 2017 no wolf or bear control had been conducted.

Currently, there is a winter registration hunt for moose under Federal subsistence regulations. If this proposal is adopted, it may be worth considering the use of a joint State/Federal registration permit to decrease regulatory complexity due to the checkerboard land status in this unit.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: There is currently no biological concern for this moose population. If this proposal is adopted, it could provide more opportunity to Federally qualified subsistence users by permitting a winter harvest on State managed lands that border many of the communities.

PROPOSAL 109 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Replace the moose general season hunt for residents and nonresidents in Unit 21A with registration permit hunts.

Current Federal Regulations:

Unit 21 – Moose

Units 21A—1 bull

Aug. 20–Sep. 25.

Nov. 1–30

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase the burden on Federally qualified subsistence users by requiring a registration permit to hunt under State regulations. However, Federally qualified subsistence users could still harvest moose under Federal regulations with a harvest ticket.

Moose populations in Unit 21A appear to be stable, but populations are only monitored opportunistically in this area. Better harvest reporting would help managers to better understand the dynamics of this population.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: If this proposal is adopted, it could improve harvest reporting in the unit.



PROPOSAL 112 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a registration permit hunt for moose in a portion of Unit 19C and eliminate the general season hunt.

Current Federal Regulations:

Unit 19 – Moose

Units 19C—1 antlered bull

Sep. 1–20.

1 bull by State registration permit

Jan. 15–Feb. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase the burden on Federally qualified subsistence users by requiring a registration permit to hunt under State regulations. However, Federally qualified subsistence users could still harvest moose on Federal public lands under Federal regulations with a harvest ticket.

There have been no reported moose surveys conducted in 19C since 2010; at this time the bull:cow ratio was recorded as 29 bulls:100 cows, which is slightly below the management goal of 30 bulls:100 cows. Since that time, there have been complaints of crowded hunting conditions in Unit 19C. Very little of the reported harvest in 19C has been by residents of Unit 19.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: If this proposal is adopted, it could improve harvest reporting in this small portion of the unit, but it would also increase the burden on Federally qualified subsistence users. The area in which the registration permit is requested is a small corridor. A registration permit for the entirety of Unit 19C may be more useful if the goal is to increase reporting and to better understand moose harvest in the area. It may also be warranted to conduct composition surveys in the area to better understand trends in moose population dynamics.

PROPOSAL 115 - 5 AAC 92.220. Salvage of game meat, furs, and hides. Require meat to be left on the bone for caribou, moose, and bison in Units 19, 21A, and 21E.

Current Federal Regulations:

36 CFR Part 242.25(a) and 50 CFR Part 100.25(a) Definitions

Salvage means to transport the edible meat, skull, or hide, as required by regulation, of a regulated fish, wildlife, or shellfish to the location where the edible meat will be consumed by humans or processed for human consumption in a manner which saves or prevents the edible meat from waste, and preserves the skull or hide for human use.



Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption. This includes the meat of the ribs, neck, brisket, front quarters as far as the distal joint (bottom) of the radius-ulna (knee), hindquarters as far as the distal joint (bottom) of the tibia-fibula (hock), and that portion of the animal between the front and hindquarters; for black, brown and grizzly bear, it is the meat of the front and hindquarter and meat along the backbone (backstrap); however, edible meat of species listed above does not include meat of the head; meat that has been damaged and made inedible by the method of taking; bones; sinew; viscera; and incidental meat reasonably lost as a result of boning or close trimming if the bones, or viscera.

§ ____ .25(j) Utilization of fish, wildlife, or shellfish.

(3) You must salvage the edible meat of ungulates, bear, grouse, and ptarmigan

(5) Failure to salvage the edible meat may not be a violation if such failure is caused by circumstances beyond the control of a person, including theft of the harvested fish, wildlife, or shellfish, unanticipated weather conditions, or unavoidable loss to another animal.

100.26(h) Removing harvest from the field

You must leave all edible meat on the bones of the front quarters and hind quarters of caribou and moose harvested in Units 9, 17, 18, and 19B prior to October 1 until you remove the meat from the field or process it for human consumption. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of moose harvested in Unit 21 prior to October 1 until you remove the meat from the field or process it for human consumption. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 24 prior to October 1 until you remove the meat from the field or process it for human consumption. Meat of the front quarters, hind quarters, or ribs from a harvested moose or caribou may be processed for human consumption and consumed in the field; however, meat may not be removed from the bones for purposes of transport out of the field.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It may take longer for Federally qualified subsistence users to pack out game from the field due to heavier loads. There would be no impact on the caribou, moose, or bison in Units 19, 21A and 21E as the animals will have already been harvested.

Federal Position /Recommended Action: The OSM recommendation is to **support** this proposal **with modification** to apply the regulation only to the period prior to October 1.

Rationale: If this proposal is adopted, it would require that the edible meat of the front quarters, hind quarters, and the ribs remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption. These regulations would be in effect prior to Oct. 1 for caribou, moose, and bison in Units 19, 21A, and 21E. Warmer temperatures prior to Oct. 1 contribute to



meat spoilage. Keeping the meat on the bone reduces spoilage and would make State regulations throughout the McGrath Management Area consistent. Colder temperatures after Oct. 1 reduce the chance of meat spoilage.

PROPOSAL 132 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Shorten the moose hunting season in Units 20A and 20C.

Current Federal Regulations:

Unit 20 – Moose

Unit 20A—1 antlered bull *Sep. 1-20.*

Unit 20C—that portion within Denali National Park and Preserve west of the Toklat River, excluding lands within Mount McKinley National Park as it existed prior to December 2, 1980—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken *Sep. 1-30.
Nov. 15-Dec. 15.*

Unit 20C, remainder—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken *Sep. 1-30.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Although adoption of this proposal would align some State and Federal seasons, there are multiple seasons in Unit 20A and 20C under State regulations. If the September 1–25 season is shortened by five days to provide moose time to become settled prior to the rut, this would still leave other seasons open to moose harvest in Unit 20A during the specified time period.

The moose population in Unit 20A is within State population objectives and research suggests that moose production in this subunit is limited by habitat condition. Due to this factor, shortening the harvest season may not have the intended outcome of increasing production.

Moose densities in Unit 20C are low and have been for multiple years. Since the September 1–25 season is the only open season for Unit 20C, this request could be suitable and have the intended effect for this subunit. However, it may be worth mentioning that the BOG extended the season to the current end date in 2012 to increase moose harvest to meet the intensive management harvest objective.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: If this proposal is adopted, it will most likely not have the intended results in Unit 20A due to the habitat being a limiting factor for moose production in the area and the availability of other open seasons during that time-frame. There is the possibility that this proposal could have the



intended effect in Unit 20C, but Federally qualified subsistence users would still be able to harvest moose through September 30th.

PROPOSAL 153 – 5 AAC 84.270. Fur bearer trapping. Extend the trapping season for wolverine in Unit 20F.

Current Federal Regulations:

Trapping

Unit 20— Wolverine

No limit

Nov. 1–Feb.28.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed hunting regulations. In addition, it would allow trappers to keep wolverines incidentally caught in a lynx set. However, this would also misalign Federal and State regulations, which could lead to user confusion.

Wolverines, which occur at low densities throughout Alaska, have large home ranges ranging from 39 mi² to 386 mi². The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 young are born between February and April. Adoption of this proposal would extend the harvest into the denning period. While females likely only leave the dens for short periods of time to access food, the risk of litter loss would increase.

The wolverine population is listed as scarce in every region throughout the state, according to the 2017 Alaska trapper report, and the biological impact of extending the harvest season is unknown. The Alaska Department of Fish and Game reported in their 2009–2011 Furbearer Management Report that male wolverine made up 40% of the wolverine harvested in Unit 20F in 2010 and 25% in 2011. It was reported that long-term trends of male wolverine harvest below 50% could indicate unsustainable harvest rates.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: The proposed change to extend the hunting season to mid-March would overlap with the wolverine denning period. This proposed change would also result in misalignment of Federal and State wolverine hunting seasons for Unit 20. The most recent published furbearer management report indicated that wolverine harvest in 20F may be unsustainable. It will be important to monitor this trend and see what the upcoming furbearer management report states before extending the trapping season in this area. Maintaining the current harvest season from Nov. 1 – end of February is recommended.



PROPOSAL 155 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 1C.

Current Federal Regulations:

Unit 1—Moose

Unit 1C—that portion south of Point Hobart including all of the Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only. Sept. 15 – Oct. 15

Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only. Sept. 15 – Oct. 15

Unit 1C—Berners Bay—1 bull by drawing permit. Sept. 15 – Oct. 15 (will be announced starting in December 2019)
Only one moose permit per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up the next whole number) of bull moose permits.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 1C would provide potential additional opportunity for Federally qualified subsistence users.

There are four management areas in Unit 1C, the Taku River drainage, Berners Bay, Chilkat Range, and the Gustavus Forelands.

Taku River: Only two moose surveys (2000, 2007) have been conducted in the Taku River area. Thirty seven and 21 moose were seen in 2000 and 2007, respectively. The annual moose harvest has averaged approximately 15 moose from 2010-2014.

Berners Bay: Due to the small closed population of moose in Berners Bay, this population is monitored by ADF&G to ensure declines in survival and reproduction are detected in time to make effective management decisions. The area is subject to severe winters and has limited moose habitat along the river corridor. The total number of moose seen in Berners Bay from 2010-2014 ranged from 73 to 105, which is within the range of the State management objective of 80-90 moose. Five moose were reported harvested annually from Berners Bay drainage from 2014-2019, which is approximately 3.5% of the 2019 population estimate of 137±23.



Gustavus Forelands: In the 1990s the population grew rapidly and accounted for over half the moose harvest in Unit 1C. In 2000, ADF&G instituted an antlerless hunt to reduce the population over concern that the available moose habitat was being over browsed. The total number of moose seen during aerial surveys from 2010-2014 ranged from 91-274 and the population estimate was 244±98. In 2018, the population estimate was 218±22, so despite the yearly fluctuations, the population currently is relatively stable to slightly increasing. From 2002-2008, hunters harvested between 11 and 67 antlerless moose annually. There was no hunt during fall 2007 due to high moose mortality during the severe winter of 2006/2007. There have been no antlerless hunts since 2009. From 2010-2014, an average of 10 bulls were harvested annually. The antlerless hunt was closed from 2010-2014.

Chilkat Range: The status of the moose population in the Chilkat Range is unknown because no recent surveys have been conducted due to the limited snow cover and a dense forest canopy. An annual harvest of 13 bull moose occurred in the Chilkat Range from 2010-2014.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas combined with drawing or limited registration hunts. Antlerless moose hunts have been conducted in both Berners Bay and Gustavus Forelands to prevent overpopulation within the limited habitat. Reauthorizing the antlerless season is not anticipated to have a negative impact on the moose populations in Unit 1C because it is intensively managed by ADF&G, there is a limited season from July 1 to September 14, and relatively low rates of participation.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season will retain management flexibility in Unit 1C and allows Federally qualified subsistence users additional opportunity to harvest a moose if implemented.

PROPOSAL 156 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 5A, Nunatak Bench.

Current Federal Regulations:

Unit 5A—Moose

*Unit 5A— Nunatak Bench—1 bull by State registration permit only. Nov. 15 - Feb. 15
The season will be closed when 5 moose have been taken from Nunatak Bench.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Nunatak Bench contains a small isolated moose population of approximately 50 animals. This population undergoes extreme fluctuations due to severe winters and limited habitat. The moose population declined from 52 in 2001 to less than 20 from 2005-2012. In 2015, only 14 moose were seen and a series of severe winters from 2006-2012 may have



prevented or slowed down the recovery. Much of the hunt occurs after bulls have lost their antlers so both bulls and cows may be harvested. An average of two moose per year were harvested between 1997 and 2004. No permits have been issued since 2004.

Due to low population numbers, there has been no opportunity for Federally qualified subsistence users to harvest moose from the Unit 5A-Nunatak Bench population since 2004. There are better areas within Unit 5A that provide more opportunity for Federally qualified subsistence users to harvest moose.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas combined with drawing or limited registration hunts. The State would like to retain the ability to implement an antlerless hunt to prevent habitat loss due to overpopulation if needed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season will retain management flexibility in Unit 5A-Nunatak Bench.

PROPOSAL 157 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 6C.

Current Federal Regulations:

Unit 6C—Moose

1 antlerless moose by Federal drawing permit only.

Sept. 1 – Oct. 31

Permits for the portion of the antlerless moose quota not harvested in the Sept. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.

1 bull by Federal drawing permit only.

Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose permit may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are



closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec.31.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: In 2018, the moose population estimate was 677, which is within State management objectives of 600-800 moose in Unit 6C. Federal public lands in Unit 6C, which have some of the best moose habitat in the unit, are currently closed to the harvest of moose except by Federally qualified subsistence users. Thus, support for this proposal is not likely to negatively affect the moose population or restrict opportunity for Federally qualified subsistence users to harvest moose in Unit 6C.

The State has not held an antlerless moose season in unit 6C since 1999/2000, since the available antlerless harvest quota has been managed by the U.S. Forest Service under Federal Subsistence regulations. Antlerless moose harvest under State regulations is limited primarily through the use of quotas combined with drawing or limited registration hunts. The State would like to retain the ability to implement an antlerless moose hunt to prevent overpopulation overgrazing on prime habitat areas if needed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless season will retain management flexibility in Unit 6C. Adoption of this proposal is unlikely to have a significant negative population level effect or adversely affect Federally qualified subsistence users.

PROPOSAL 158 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 13.

Current Federal Regulations:

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; Aug. 1–Sept. 20 only 1 permit will be issued per household.

Unit 13, remainder —1 antlered bull moose by Federal registration permit only. Aug. 1–Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 13 would provide additional opportunity for Federally qualified subsistence users.

Moose populations in Unit 13 have grown since 2001, due to a combination of mild winters, predator control, and more conservative hunting regulations. In 2018, the population estimate was 18,863, which is within the State management objective of 17,600-21,900 moose.

Anterless moose harvest under State regulations is limited primarily through the use of quotas and drawing or limited registration permits. The State would like to retain the ability to implement an anterless hunt to regulate moose populations if needed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the antlerless season will retain management flexibility in Unit 13. Adoption of this proposal is not likely to have a negative effect on the local moose populations or restrict opportunity for Federally qualified subsistence users.

PROPOSAL 160 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the Twentymile/Portage/Placer hunt areas Units 7 and 14C.

Current Federal Regulations:

Unit 7—Moose

Unit 7 – that portion draining into Kings Bay *No open season*

Federal Public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek.

*Unit 7 remainder –1 antlered bull with spike-fork or 50 inch antlers
ore with 3 or more brow tines on either antler, by Federal registration
permit only* *Aug. 10-Sept. 20*

Unit 14—Moose

Unit 14 *No open season*



Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Units 7 would provide additional opportunity for Federally qualified subsistence users.

Moose populations in the Twentymile/Portage/Placer area fluctuate widely, with rapid increases during mild winters and declines due to over-browsing limited winter habitat, severe winters, and moose-vehicle collisions. In 2016, the moose population in this area was 153, with a bull:cow ratio of 30 bulls:100 cows and a calf cow ratio of 18 calves:100 cows. The antlerless moose season has been used in the past to reduce the population to prevent over-browsing of winter habitat, reduce moose-vehicle collisions, and to reduce stress associated with winter food shortages.

The State would like to retain the ability to implement an antlerless hunt to regulate moose populations if needed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will retain management flexibility in Units 7 and Unit 14. Adoption of this proposal is not likely to have a negative effect on moose populations in the Twenty Mile/Portage/Placer area or restrict opportunity for Federally qualified subsistence users.

PROPOSAL 163- 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 15C.

Current Federal Regulations:

Unit 15—Moose

Unit 15A remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug 10–Sept 20

Units 15B and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October/November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council. Oct 20–Nov 10



Unit 15C—1 cow by Federal registration permit only

Aug. 10-Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 15C would provide additional opportunity for Federally qualified subsistence users.

Federally qualified subsistence users hunting moose under Federal regulations have an earlier and longer season than the State season, a cow hunt, and less restrictive antler conditions. However, refuge lands make up only a small portion of Unit 15C and available habitat can be a limiting factor during winters with deep snow accumulations. Since 2004, fires have burned over 87,000 acres and thus there is good potential for increased moose browse. A State antlerless hunt was established in Unit 15C to limit winter loss on the Homer Bench, prevent habitat destruction, and reduce moose-human conflicts.

In 2001, the moose population estimate for the area north of Kachemak Bay was 3,529 (95% CI:2,769-4,289), which is within the State intensive management objectives of 2,500-3,500 moose for Unit 15C. Population estimates and bull:cow ratios above 20 bulls:100 cows suggest that the moose population is on a positive trend.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas and drawing or limited registration permits. The State would like to retain the ability to implement an antlerless hunt to for the Homer Bench hunt (DM549), targeted hunt along the Sterling Highway (AM550) for the 2020-2021 season.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will retain management flexibility in Unit 15C. Adoption of this proposal is not likely to have a negative effect on moose populations or restrict opportunity for Federally qualified subsistence users.

PROPOSAL 165- 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 17A.

Current Federal Regulations:

Unit 17—Moose

Unit 17A—1 bull by State registration permit only.

Aug 25–Sept 20

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit.

Up to a 31-day season may be announced between Dec. 1-last



day of Feb.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 17A would provide additional opportunity for Federally qualified subsistence users.

An antlerless season was opened in December 2013 in support of the Unit 17A Moose Management Plan. Under the plan, an antlerless moose hunt can be offered when the moose population is increasing and the population reaches a minimum of 600 moose. In March 2017, the Unit 17A moose population estimate was 2,369±564 and growing. Due to the high moose population, the Board of Game adopted a fall antlerless hunt in 2018 with an increase in the harvest limit to two moose. The antlerless hunt in the fall and winter allows ADF&G to limit the population growth and allows hunters to harvest surplus animals.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas and drawing or limited registration permits. The State would like to retain the ability to implement an antlerless hunt during the spring and fall in Unit 17A if needed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Current regulations allow hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will retain management flexibility in Unit 15C. Adoption of this proposal will allow for control of local moose populations and will provide additional opportunity for Federally qualified subsistence users.



IN REPLY REFER TO:

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

OSM 19096.PM

Mr. Ted Spraker, Chairman
ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 17-20, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Western Arctic/Western Region. We have reviewed the 43 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle,
Acting Assistant Regional Director

Enclosure



Chairman Spraker

2

cc: Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Karen Deatherage, Council Coordinator, Office of Subsistence Management
Zachary Stevenson, Office of Subsistence Management
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Western Arctic/Western Region

January 17-20, 2020

Nome, Alaska

Office of Subsistence Management (OSM)



that are not reported each year. As of 2014, ADF&G believes that this level of harvest was sustainable based on density estimates.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest brown bear in Unit 26A. However, updated population information on this species is recommended before the harvest limit is increased to two bears every regulatory year.

PROPOSAL 31 – 5 AAC 85.050. Hunting seasons and bag limits for muskoxen. Establish a registration permit hunt for muskoxen in Units 21D, 22A, and 24D.

Current Federal Regulation:

Unit 21D – Muskox	<i>No Federal Open Season</i>
 Unit 22A – Muskox	 <i>No Federal Open Season</i>
 Unit 24D – Muskox	 <i>No Federal Open Season</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Muskox were reintroduced to Units 22C and 22D of the Seward Peninsula in 1970, and have since expanded their range to the north and east. Currently, muskox occupy suitable habitat in Units 22A, 22B West, 22C, 22D, 22E, and 23-Southwest. Limited harvest of this population is permitted in Units 22B, 22C, 22D, 22E, and 23 under either State or Federal regulations. A majority of the Federal public lands in these areas are closed to the taking of muskox except by Federally qualified subsistence users, due to the low muskox population in the region.

Although the muskox population experienced periods of growth between 1970 and 2010, the Seward Peninsula muskox population began to decline in 2010. Between 2010 and 2012 the muskox population declined 12.5% annually throughout the Seward Peninsula. Recent research suggested that selective harvest of mature bulls on the Seward Peninsula could be a driver of reduced population growth and that



annual harvest be restricted to less than 10% of the estimated number of mature bulls. Following this change in harvest strategy, the Seward Peninsula muskox population remained stable through 2017, but populations still remain lower than in the past. Increasing harvest of this population could lead to another decline in the overall population of muskox in this region.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: In addition to direct mortality due to harvest, muskox survival could be susceptible to herd disturbances during winter months if caloric expenditures are too high. Harvest on the Seward Peninsula was reevaluated and reduced in 2012 due to a declining muskox population. Recently, some localized populations have experienced a slight increase or have remained stable, but they still remain at much lower numbers than in the past. Current harvest strategies should remain in place to ensure that these muskox populations have the opportunity to reach healthy levels.

PROPOSAL 32 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E.

Current Federal Regulations:

Unit 22E—Caribou

<i>Units 22A—that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E—that portion east of and including the Tin Creek drainage—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30</i>
<i>Units 22C, 22D remainder, 22E remainder—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30, season may be announced</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase harvest opportunity for Federally qualified subsistence users hunting between the Sanaguich and Nuluk River drainages. Federal and State hunt areas in Unit 22E are currently misaligned and would remain misaligned if this proposal is adopted. Federal regulations would become slightly more restrictive than State regulations since the season for the area between the Tin Creek and Nuluk River drainages would still be may-be-announced under Federal regulations. However, Federally qualified subsistence users would still be able to harvest caribou on Federal public lands in this area under State regulations. No conservation concerns exist for this proposal as the primary reason western Unit 22E has a may-be-announced caribou season is to protect reindeer.



Submitted By
Adam Owen
Submitted On
2/13/2020 2:24:55 PM
Affiliation

~~To: Alaska Board of Game

Re: Withdrawal Request Proposal #71

Dear Chairman Spraker and Board members,

I am the author of Proposal #71 which is before the Board at the 2020 Region III meeting. After further consideration and in talks with other hunters, it is my desire to withdraw my proposal #71 which is written to allow brown bear to be taken over bait in Unit 24A. The rationale of this withdrawal request is because the DHCMA is one of the last areas in the state where bow hunters can drive to spot and stalk grizzly bears without the pressure of bear baiting stations influencing the movement of grizzly bears. This unique hunting opportunity should be preserved and given priority over baiting. Hunters have many areas across the state of Alaska to hunt grizzly bears over bait, but very few, if any, areas on the road system where they can spot and stalk grizzly bears without the pressure and influence of bait stations.

Should the Board decide to deny this request to withdraw my proposal #71, I therefore request that Proposal #71 be amended to allow a compromise such that hunting grizzly bears over bait stations be allowed south of Slate Creek only. This would still provide bow hunters spot and stalk opportunities from Slate Creek north without the influence of bait stations affecting grizzly bear behavior.

Thank you for your consideration,
Adam Owen



Submitted By
Matt Palmquist
Submitted On
2/13/2020 8:00:14 AM
Affiliation

Phone
7858260995

Email
matthewp@ruraltel.net

Address
PO Box 218
Grainfield, Kansas 67737

I am in favor of proposal 50 and proposal 53. I do not support proposal 49. Thank you, Matt Palmquist



Submitted By
Sylvia & Marius Panzarella
Submitted On
2/21/2020 1:30:57 PM
Affiliation
Self

Phone
907-334-9296

Email
Chipscout@mac.com

Address
7022 Tanaina Dr.
Anchorage , Alaska 99502

We support Proposal 152. Surely you can agree on this proposal which shortens the hunting and trapping season in this area. It allows for more breeding wolves and pups to live longer which supports the tourism industry. If you understand nothing about fairness for all users, perhaps you can understand \$\$\$\$ which is growing by leaps and bounds with the tourist industry. Please support this proposal. People in Alaska and the world are watching the decisions you make. Thank you.

Sylvia & Marius Panzarella



Submitted By
Stan Parkerson
Submitted On
2/19/2020 8:00:40 PM
Affiliation
Guide

Phone
9073787977

Email
stan@denalihunts.com

Address
1441 Ivan's Alley
Fairbanks, Alaska 99709

I would like to go on record as opposing Proposal # 71. I have NO issues with baiting of Grizzlies and in some areas the likelihood of harvesting a bear without bait is very unlikely. However, this is not one of those areas, quite the contrary, this is an ideal area for glassing and spot and stalk hunting.

I further understand that the person that submitted this proposal has asked that it be withdrawn and not passed. Please honor his wishes and not pass Proposal 71



Submitted By
Rob Patuto
Submitted On
2/17/2020 5:35:41 AM
Affiliation

Phone
2086103795
Email
robpatuto@gmail.com
Address
821 W. Shingle Mill Rd.
Sandpoint, Idaho 83864

Re; Proppsal #49

I ask that you look at the negative impact that allowing widespread use of the crossbow in archery seasons across the country has resulted in. It has been proposed in all of these state under the guise of a solution, generally to problems that did not exist. A 50 lb bow at 85% letoff is not an unattainable goal for someone who wants to bowhunt. This has been a can of worms that many states wish had never been open. The increased harvest being one of the most impactful consequences.

Thank You, Rob

Submitted By
Rob Patuto
Submitted On
2/17/2020 5:13:57 AM
Affiliation

Phone
2086103795
Email
robpatuto@gmail.com
Address
821 W. Shingle Mill Rd.
Sandpoint, Alabama 83864

Proposal #50

I hope the board would consider ruling in favor of proposal #50 regarding extending the Moose season. The limited impact, the tight regulation, and increased hunter days seems like a great deal for everyone. Doesn't exclude anyone.

Thank You, Rob

Submitted By
Rob Patuto
Submitted On
2/17/2020 5:21:20 AM
Affiliation

Phone
2086103795
Email
robpatuto@gmail.com
Address
821 W. Shingle Mill Rd.
Sandpoint, Idaho 83864

Re; Proposal #53

I am writing in support of this proposal. It does not take any opportunity away, it increases days afield with very low impact. As a registered hunt it keeps a close eye on statistics and would increase revenue for the state.

Thank You, Rob



Submitted By
 steven Perrins
Submitted On
 2/21/2020 10:25:12 PM
Affiliation
 rainy pass lodge

Phone
 9072306093
Email
 theperrins@rainypasslodge.net
Address
 PO Box 221267
 Anchorage, Alaska 99522

Proposal 47

RHAK is at it again, and they won't be happy until they can kill the Guiding industry. This is just another tactic to start the non-resident hunter in a total drawing permit scheme in the state of Alaska. The board has a responsibility to all Alaskans, including those of us that make our living in the hunting business, We are the ones that spend hundreds of thousands of dollars promoting tourism to Alaska. We donate tens of thousands of pounds of meat a year to Alaskans. We report game findings to our fish & game biologists annually to protect the species for our future generations of Alaskans and non-residents. It's the non-resident hunter that provides the line share of income to the state to manage the game for all Alaskans. IM programs have been used as a tool to help manage ungulate populations, and it is not unusual to have those in place for many years at a time and they tend to stay in place because they are effective. In Unit 16 the IM program has been ongoing and now even with a 1000 surplus moose it stays in place. This new regulation would have put the oldest hunting lodge in Alaska (Rainy Pass Lodge) out of business. The fact that as professionals we spend more time and money in the field, it stands to reason guides success rate would be proportionately above the resident hunter. In proposal 52 RHAK wants sheep on a permit, on Kodiak they want bears on permit and only 10% allotment. RHAK does not represent the average Resident hunter in Alaska, they don't even represent the majority of its own membership. Drawing permits are the death of the industry for guides, and are not liked even by residents themselves in most areas. There is enough to go around and moose and Caribou in unit 19 is not suffering because of the non-resident hunter, in fact it brings in needed commerce for all those areas, and the conservation model has always been best supported by the non-resident guided hunts. I strongly oppose this proposal. I have hunted and guided in unit 19c for over 42 years and the only real problem we had was when a terrible governor closed aerial wolf hunting which caused the greatest damage to our ungulate populations. Now the game are on the grow and IM programs are working well along side the Non-resident hunter as well as the resident hunter.

Steven H. Perrins
Master Guide #123



Submitted By
 steven Perrins
Submitted On
 2/21/2020 10:27:05 PM
Affiliation
 Rainy Pass Lodge

Phone
 9072306093
Email
 theperrins@rainypasslodge.net
Address
 PO Box 221267
 Anchorage, Alaska 99522

Proposal 52

Again RHAK is at it to eliminate guides and guiding businesses. They know we can't survive and make a living on drawing hunt areas. we will become a state of part time guide operators and the Alaska reputaion of professionalism in the hunting and guiding world will be done. This is not a subsistence issue or a put meat on the table for Alaskans issue. This is RHAK wanting it all for a few wealthy resident hunters, not the majority of Alaskan hunters. If it's about the resource, I say close the sheep season for 3-4 years and give the animlas a break. However we know that the full curl law is taking care of the conservation of sheep. Is it a crowding issue, or is it RHAK just wants it all for themselves. If you really want to please them, Tell them to come to the table with APHA or myself as a liason to what residnet hunters really want or need, But I have offered that and there answer is they don't want to compromise, they want it all there way. I have a suggestion you may consider. Allow non-resident hunts on even years and resident hunts on odd years and therefore the residents can have it all one year and the non-residents can have it the next year. That may cause a little imbalance on license and tag finances for the state, but not a total flop. I'm sure that won't make them happy either. However it may show there true colors, again. It would stop their crying about guides over crowding them, and we won't have to put up with their un-ethical behavior in the field on the odd years. Oh but maybe a few of us guides will get out and hunt as residents for sheep too. Let's think outside the box, and maybe they would except an invite to sit at the table, before they bring their bias proposals to the board next time. I suggest we can still hunt together as I hunt alongside resident hunters every year and have for 42 years in our area.

Sincerely,

Steven H. Perrins

Master Guide #123

The Perrins' Rainy Pass Lodge LLC



Submitted By
Jon Marc Petersen
Submitted On
2/18/2020 2:37:28 PM
Affiliation

Phone
907-715-8467
Email
jmp@denalilaw.com
Address
360 North Main Street
Wasilla, Alaska 99654

Regarding Proposal 112, and 5AAC 85.045

I have hunted this area since 2015. I have not harvested a moose on every hunt and have reported the moose I have taken. I would say that most of the hunters I hunt with and have come to know who hunt this area are also reporting the game they harvest. What is the evidence that there is an under-reporting of harvested moose? No supporting data or evidence is mentioned to substantiate this assertion that hunters are not reporting. The proposal for a registration hunt would seem an extreme reaction to a problem that should have empirical evidence to back it up.

Farewell is a remote hunt and requires a great deal of logistical coordination and financial resources, frequently commencing right after one hunt's conclusion. There are freight and passenger flights that are booked and scheduled a year in advance. Being a remote hunt provides a unique opportunity to unplug and get away to rejuvenate and recharge. As an attorney, this time is treasured and valued. This hunt has been meaningful not only from a meat harvesting stance (I have six children, so moose in the freezer is very important) but also as enrichment for my personal and business life. Those who routinely hunt this area have become close friends who I see once a year in Farewell, and this is a unique opportunity that I don't want to lose.

Making this a registration hunt seems to be a reach given the information provided to the board, and I would request the board make decisions based on facts and not speculation regarding underreporting of harvest. The Troopers have a very active presence and visited our camp, which is 13 miles from the airstrip, so they are actively patrolling and monitoring the hunters and game in this unit going into and out of the strip. A registration hunt is not warranted for this region.

Jon-Marc Petersen



Submitted By

William Pettett

Submitted On

2/13/2020 12:20:05 PM

Affiliation

Phone

3035706017

Email

bill_pettett@hotmail.com

Address

PO Box 965

Kremmling, Colorado 80459

Proposal 50 - SUPPORT

Proposal 53 - SUPPORT

Proposal 49 - DO NOT SUPPORT



Submitted By
James Pfitzer
Submitted On
2/21/2020 12:08:06 PM
Affiliation

Phone
4239870003

Email
jim@jimpfitzer.com

Address
7303 N. Douglas Highway
Juneau, Alaska 99801

Dear Alaska Board of Game,

I am writing to support Proposal 152, which would implement a seasonal closure on hunting and trapping of wolves within the Stampede Corridor of the Denali Borough.

As a professional guide and wildlife photographer in Alaska, I recognize the world class wildlife viewing opportunities found in Denali National Park. Those opportunities are a big part of why well over a half million people visit to the park every year, and why countless more visit the surrounding area. And, of course, there is hardly a more desired wildlife encounter than a chance to see—and for many, to photograph—a wild wolf.

Unfortunately, wolves that roam Denali are not bound by park boundaries and are therefore vulnerable to management practices outside the park proper. So, in order to have a healthy and sustainable wolf population in the park, there must be some protections around the park as well.

But beyond the important tourism dollars that come from people visiting Denali in hopes of seeing a wolf, it is important to look at the intrinsic value of wolves in the ecosystem. In his famous essay *Thinking Like a Mountain*, Aldo Leopold very eloquently spelled out what a landscape that has been robbed of its wolves looks like. He wrote:

“I have lived to see state after state extirpate its wolves. I have watched the face of many a newly wolfless mountain, and seen the south-facing slopes wrinkle with a maze of new deer trails. I have seen every edible bush and seedling browsed, first to anaemic desuetude, and then to death. I have seen every edible tree defoliated to the height of a saddlehorn...”

Leopold went on to say, “I now suspect that just as the deer herd lives in mortal fear of its wolves, so does a mountain live in mortal fear of its deer. And perhaps with better cause, for while a buck pulled down by wolves can be replaced in two or three years, a range pulled down by too many deer may fail of replacement in as many decades.”

To put it bluntly, where wolves have evolved to roam, the health of the land is dependent upon their presence, and no place is more emblematic of wolf country than Denali National Park.

If the economic impact and the health of the land are not enough, consider a few more of Leopold’s lines in the opening of *Thinking Like a Mountain*:

“A deep chesty bawl echoes from rimrock to rimrock, rolls down the mountain, and fades into the far blackness of the night. It is an outburst of wild, defiant sorrow, and of contempt for all the adversities of the world. Every living thing (and perhaps many a dead one as well) pays heed to that call... Those unable to decipher the meaning know nevertheless that it is there, for it is felt in all wolf country, and distinguishes that country from all other land. It tingles in the spine of all who hear wolves by night, or who scan their tracks by day.”

As Leopold suggests, simply knowing one is in wolf country is to experience a little bit of wild magic, and for most park visitors who don’t actually lay eyes on a wolf, that knowledge is worth the trip. That knowledge is reason enough to be there, and in order for them to have that knowledge, in order to ensure Denali remains wolf country, we must do what we can to protect the wolves in this important corridor outside the park boundary.

So, for economic reasons, for the health of the land, and quite simply to keep Denali the wild and magical place it is, please take the responsible path and adopt Closure 1, which would protect the larger area in the corridor.

Thank you for the opportunity to weigh in on this important issue.

Sincerely,

James M Pfitzer



Submitted By
Shannon Polson
Submitted On
2/21/2020 12:37:05 PM
Affiliation
resident

Dear Alaska Board of Game, I am writing to support Proposal 152, which would implement a seasonal closure on hunting and trapping of wolves within the Stampede Corridor of the Denali Borough. My family owns a cabin just outside of the park. We are grateful for the time we have in true wild places, and the highlight of all of our trips has been the opportunity to observe wildlife such as wolves in the wild, interacting in a place where nature, not humans, dominate the landscape. These opportunities exist in Denali National Park, but are vulnerable to conflicting wildlife management practices outside park boundaries. Tourism is critical to our community's and state's economy. Let us take reasonable measures to preserve such opportunities for Alaska's visitors. I support Closure 1, which would protect the larger area in the corridor. Thank you for the opportunity to comment.



Submitted By
Richard A. Price
Submitted On
2/9/2020 11:16:50 AM
Affiliation

PROPOSAL 120 – 5AAC 85.045:

Shorten the season for the any-Bull Moose drawing permit hunt in Unit 20A.

WHAT WOULD THE PROPOSAL DO? Change/shorten the hunting season length in **Unit 20A**, for the any-Bull Moose drawing permit hunting season **from Sept. 1 – Sept. 25 (current regulations), To Sept.1 – Sept. 10 (new proposal).**

COMMENTS (Richard A. Price) : **I – OPPOSE** the requested modification to the existing closure dates for the any-Bull Moose drawing permit season in **Unit 20A** from **Sept. 1 – Sept. 25 To Sept. 1 – Sept 10.**

The Alaska Department of Fish and Game (the Department) instituted the any-Bull Moose permit hunts in Unit 20A in 2006. Presently the Department has established that the **management objective** for a **healthy bull: cow ratio** is **30 bulls per 100 cows**. When Department **surveys** indicate, that the **bull: cow ratios** in Unit 20A are presently **at or above their objectives**, they issue any bull permits to take the additional harvestable portion of the bulls.

Subsequently, there is **NO BIOLOGICAL BASIS** for modifying the current opening and closure dates of the any-Bull Moose drawing permit hunt in Unit 20A. The **Department** has established that the **bull: cow ratios meet their present management objectives** under the existing harvest strategy.



Submitted By
Richard A. Price
Submitted On
2/9/2020 11:22:11 AM
Affiliation

PROPOSAL 129 5 AAC 92.540(3)(H)(ii):

Change the closure dates for the Yanert River Controlled Use Area (CUA) in Unit 20A to **align** with the Wood River CUA.

Clarify whether horse feed is considered "**hunting gear**".

WHAT WOULD THE PROPOSAL DO? Change/designate specific motorized closure dates in the Yanert River CUA, from **year-round** to **2 months**.

In addition, clarify whether horse feed is considered "**hunting gear**." Currently, there is **NO** available information explicitly identifying whether horse feed is considered "**hunting gear**."

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The closure dates for the Yanert River CUA in Unit 20A would **align** with the Wood River CUA **allowing motorized vehicles access during October through July**. As a result, allowing motorized usage throughout this period would permit hauling big game hunting gear to camps prior to August and hauling gear out of camps after September.

Horse feed would be recognized/documented as **hunting gear**, or recognized/documented as **not hunting gear**.

COMMENTS (Richard A. Price): – I **SUPPORT** the alignment of Yanert River CUA with the Wood River CUA, designating specific closure dates for hunting with motorized vehicles, from **Aug. 1 – Sept. 30**.

The Alaska Department of Fish and Game (the Department) established by regulation a winter caribou hunt in the Yanert River drainage; possibly sometime around statehood.

Ultimately, the **last winter caribou hunt** allowed in the Yanert River CUA was during the **1982-1983 seasons**; (from Dec. 1-March 31).

- During the early 1980s, the Department recognized that a small group of caribou in the Yanert River drainage, the Yanert caribou herd, eventually mixed with the Delta caribou herd, and after 1986, the Yanert caribou herd melded with and adopted the movement patterns of the larger Delta herd (Valkenburg et al. 1988).

With that said, as the winter caribou movement patterns in the Yanert River drainage changed; the Department management objectives changed leading to the cancellation of the winter caribou hunt in the Yanert River CUA.

Subsequently, there is **NO biological basis** for not implementing a closure date of Aug. 1 – Sept. 30 for motorized vehicle usage in the Yanert River drainage and allow motorized vehicles access during October through July as is allowed in the Wood River CUA.

Please note, the proposed change is not likely to notably alter current harvest levels as the August and September access restrictions for hunter for motorized access would still be in place.

Also, I **SUPPORT** the clarification on a statewide basis of identifying whether horse feed is considered **hunting gear** as this would clearly define for **Alaska hunters** and **State of Alaska (SOA) Peace Officers** what is considered **hunting gear**.

Presently, a great deal of confusion exist; some SOA Peace Officers interpret that horse feed be defined as hunting gear, and yet other SOA Peace Officers contend that horse feed should not be defined as hunting gear (horse feed **is not** defined as such in the Departments Hunting Regulation Booklet).



Submitted By
Mark Reinhardt
Submitted On
2/20/2020 1:25:56 PM
Affiliation
No to Proposal # 49



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

**Comments to Alaska Board of Game
Region III Interior/Northeast Arctic
March 6 – 14, 2020**

Proposals we support: 47, 48, 51, 52, 54, 62, 65, 79, 80, 82, 129, 134, 145, 146

Proposals we oppose: 77, 78, 81, 87, 90, 152

**Proposal 47 - 5AAC 85.025 Hunting seasons and bag limits for caribou
5AAC 85.045 Hunting seasons and bag limits for moose**

Nonresident hunting shall not be allowed in Region III (Interior/Northeast Arctic) for any moose or caribou population under a current active Intensive Management (IM) Predation Control Program designed to help feed Alaskans until the minimum IM population or harvest objective for that population has been reached.

SUPPORT

This is a RHAK proposal we believe is consistent with the intent of Intensive Management (IM) Law and consistent with the board’s past opinions.

Case in point: the board passed a proposal to allow limited nonresident hunting of the Nelchina caribou herd, which is an IM listed caribou population thousands of Alaskans depend upon for food, stating that nonresident hunting will only be allowed when the herd is within IM objectives. Every moose and caribou herd in the state listed as an IM population with specific objectives should fall under this same guideline, regardless if there is an Active IM predation control program in place.

According to our Intensive Management law, the highest and best use of certain prey populations is for human consumption by Alaskans, and Alaskans are given a priority to these populations. When those populations are under the population or IM objective, no nonresident hunting should be allowed.

Proposal 51 – 5AAC 85.055 Hunting seasons and bag limits for sheep

Remove the bag limit restriction of one sheep every four years for nonresidents over the age of 60

SUPPORT as AMENDED – no age class restriction



This one-every-four-year restriction on nonresident sheep hunters was the result of proposal #30 from the Alaska Professional Hunters Association (APHA) that the board passed at the 2016 Statewide meeting.

The intent of the proposal was to *"save some sheep each year, thus this helps to conserve our resource."*

RHAK continues to ask the Board to limit all nonresident sheep hunters to draw only permits with a limited allocation in certain areas. Certainly, that would "save some sheep every year." This one-every-four year restriction does nothing overall in that regard and hurts 2DK nonresidents who want to hunt with a relative as their guide more so than the typical guided hunter.

The Department reported that only 4.5 percent of nonresident sheep hunters return to hunt again within a 4-year period, and because the demand to hunt Dall sheep was high among nonresident hunters overall it would likely have zero effect on sheep conservation.

The Department also stated, as they do now, that they have no conservation concerns for Dall sheep; the full-curl management strategy is sustainable.

It should be noted that RHAK **opposed** proposal 30 based on the same opinion of the Department in their presentation to the board, and because we felt it was a backhanded attempt to go after second-degree-of-kindred (2DK) nonresident hunters who come to Alaska to hunt with a resident relative acting as their guide.

Ironically, after Proposal 30 passed, the Wild Sheep Foundation accused RHAK of proposing it, and negatively affecting the 93 percent of their members that did not live in Alaska. Somehow the organization that advocates for a resident hunting priority got falsely smeared for something the guide industry pressed for. Even more ironic considering that the Wild Sheep Foundation has donated hundreds of thousands of dollars to APHA and partners with them on many issues.

Some guides have repeat clients, which is a good thing. Some resident Alaskans may want to hunt sheep with their nonresident brother every year while they are able, also a good thing whenever the opportunity (draw or general hunt) is available and the Department has no conservation concerns.

We do not support the age-class restriction in this proposal; it is not necessary. We support as amended to remove the age class restriction.

Proposal 52 – 5AAC 85.055 Hunting seasons and bag limits for sheep

Put all nonresidents on draw permits for Units 20 Remainder and 19C, with a limited allocation of up to 50 permits for each subunit



This is a RHAK proposal asking to limit nonresident sheep hunters in Subunits 20A Remainder and 19C.

We urge and remind board members and the public to read through our proposal and recognize that the problems Chairman Spraker outlined back in 2013 in his testimony to the legislature are ongoing today, seven years later. Chairman Spraker and the Board of Game have long recognized the problems of unlimited nonresident guided sheep hunting opportunity, but have been reluctant to use their authority to place limits on that user group, blaming the problem on “too many guides,” rather than too many nonresident sheep hunters who are required to hire a guide being given unlimited sheep hunting opportunity.

Yes, even guides agree there are too many guides but that’s the purview of their professional licensing board to deal with; it’s the Board of Game’s job and duty to protect and conserve our wildlife populations, but also to deal with conflicts afield, competition between nonresident guided hunters and resident hunters, and opportunities for residents to be successful. The way the board deals with those issues revolves around allocation.

The bottom line: the Board of Game for over a decade has stated that we have problems afield in certain areas during sheep season related to nonresident sheep hunter numbers. One of those areas is 20A Remainder we include in our proposal. The problems remain, and while they may not at this time be related to conservation concerns, they are real and greatly impact resident and nonresident hunter alike and it’s time to correct them via limits on nonresident sheep hunters.

Proposal 62 – 5AAC 92.069 Special provisions for moose drawing hunts

Change the 50 percent allocation of permits to nonresidents to 10 percent. Allocate any nonresident permits not applied for to the resident pool.

SUPPORT

This is a RHAK proposal and we’ve extensively outlined the rationale for it within the proposal.

In 2008 the Board of Game passed Proposal #55 from a guide with exclusive guiding rights within the Nowitna National Wildlife Refuge, to change the allocation format of an already existing moose draw hunt with 20 available permits. Prior to that, the draw hunt was open to both residents and nonresidents to equally apply for and receive one of the 20 permits. The guide complained that too many residents were putting in for and winning that permit, many didn’t show up for the hunt, and he was losing business as a guide who catered to mostly nonresident hunters.

The Board voted to allocate half of the 20 permits to nonresidents.



But that didn't necessarily help the guide because moose are not a required must-be-guided species. So the guide had also argued to make moose a must-be-guide species for nonresidents for that individual draw hunt.

(Please note: RHAK opposes the creation of any new must-be-guided species hunts for any species not listed in AS 16.05.407/408. It is outside the Board's authority and is only used to benefit guides.)

The Board voted that 10 of the available draw permits would be awarded to nonresidents and out of those 10 permits, 7 would be awarded to those who must contract with a licensed guide. That licensed guide, of course, was the guide who had submitted the proposal.

So we have what is essentially a subsidy to an individual guide at the expense of resident hunting opportunity. A guarantee that in this coveted area with "trophy" moose he will have 7 clients willing to pay his fee of \$17,000 per hunt.

If that weren't bad enough, it turns out that for this hunt, for the 7 nonresident must-be-guided permits, the nonresidents wanting to put in for that hunt don't have to actually apply for a permit during the application period. Since this hunt is within a federal Refuge where the guide has exclusive guiding rights, any must-be-guided permits are essentially awarded to the guide. It's up to the guide who gets to hunt.

In 2017 there were zero applicants during the Nov/Dec application period for the 7 DM 811 nonresident must-be-guided permits. We originally requested within our proposal to allocate any permits not applied for during the application permit period, be transferred back to the resident pool. But come to find out from the Department all of those 7 unapplied-for permits in 2017 were actually hunted in 2018 via an over-the-counter tag and signed guide-client agreement. During the 2018 application period 3 DM 811 permits were applied for and the other 4 "were picked up by hunters."

How can it be that residents are absolutely required to go through the lottery permit process, yet nonresident guided hunters are allowed to bypass it completely? Think of what could be going on under this type of scenario where guides have exclusive guiding rights on Refuge lands and the permits are actually allocated to them. Guides pick and choose their clients rather than all nonresidents having the opportunity to equally draw. Rates go up as preference is given.

There is no better example of Board of Game malfeasance than the original passage of proposal 55 in 2008 to allocate **50 percent of the moose draw permits to nonresidents** to benefit a particular guide at the expense of resident hunters, and the Board's continued refusal to change the allocation back to where it clearly favors residents.

Proposal 80 – 5AAC 85.025 Hunting seasons and bag limits for caribou



Extend the resident season and increase bag limits for residents only in Unit 26B Remainder

SUPPORT AS AMENDED – Remove the quota and registration requirement restrictions on nonresident hunters; leave nonresident season and bag limit the same

This is a RHAK proposal. Since its submission last May, the Department has done survey and inventory flights and new data is available that show the herd may be nearing 30,000 animals, which is within the population objective of 28,000 – 32,000 animals, and that allowable harvest is not being met.

We have amended our proposal so that there be no changes to nonresident opportunity. But we certainly do not support increasing nonresident opportunity at this time.

When the Board in 2017 placed new restrictions on resident and nonresident caribou hunters of the Central Arctic Herd (CAH), the restrictions to residents were too severe. 25% of resident harvest opportunity was lost when the Board placed a 2-caribou bag limit on residents. Removing cow harvests and shortening the season ended up being another near-25 percent of the harvest opportunity residents had enjoyed in the past.

Since the new restrictions in 2017, resident hunter numbers have dropped because these restrictions made it less economical to hunt and herd migration patterns have changed. Nonresidents now take half the harvest annually, yet there is now an allowable harvest that isn't being met. The ANS is also not being met.

Let's increase resident opportunity back to near the way it was and see if residents can take up that allowable harvest. Leave nonresident opportunity the same.

Proposal 81 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Increase nonresident bag limit for caribou in Unit 26

OPPOSE

In 2017 the Board of Game drastically reduced seasons and bag limits for the Central Arctic herd (which is an identified Intensive Management population) for both residents and nonresidents, due to a sudden decline in the herd from ~50,000 animals to ~22,000 animals, putting it well below the IM population objective of 28,000 – 32,000 animals.

The action the board took was based on Department analysis that there was now a harvestable surplus of 680 caribou and projections that the reduced seasons and bag limits needed to sustain and regrow the herd would result in nonresident hunters taking 43 percent of the harvest, and resident hunters taking 57 percent of the harvest.

Right there and then, the board was not adhering to the guidelines, much less the intent, of our Intensive Management law (AS 16.05.255(f)) that states:



"The Board of Game may not significantly reduce the taking of an identified big game prey population by adopting regulations relating to restrictions on harvest or access to the population, by customary adjustments in seasons, bag limits, open and closed areas, methods and means, or by other customary means authorized under (a) of this section, unless the board has adopted regulations, or has scheduled for adoption at the next regularly scheduled meeting of the board regulations, that provide for intensive management to increase the take of the population for human harvest consistent with (e) of this section."

The board did not adopt regulations that would provide for Intensive Management and neither did the board schedule for adoption at the next meeting regulations that would provide for Intensive Management of the Central Arctic herd.

What is unconscionable here is that with the sudden decline of the CAH below the IM population objective the board would even consider severely restricting resident hunters who depend on this herd to feed their families and at the same time allocate nearly half the harvest to nonresident hunters. As it turned out, the first year (2017) under the new restrictions to seasons and bag limits, nonresident hunters took 52 percent of the harvest of the CAH and the year after (2018) nonresidents took 46 percent of the harvest.

Total hunter numbers, especially resident hunter numbers, have declined after the imposition of these new restrictions, and for the past three years the total harvest in Unit 26B has only been about half of the 680 animals the Department has determined is the harvestable surplus.

Being as the harvestable surplus is not being met, the author of Proposal 27 seeks to double the nonresident bag limit from one to two bulls, keeping the season the same, based it seems on an economic argument that this would help his air-taxi business and bring in more revenues to the Division of Wildlife Conservation.

Allocating more caribou to nonresident hunters under these conditions is the exact opposite of what the board should do.

The Central Arctic herd, again, is a designated IM population and under 5AAC 99.025 has a positive Customary and Traditional use finding and an Amount Necessary for Subsistence (ANS) for all of Unit 26B of 250-400 animals. We are currently ***not meeting*** ANS requirements.

The federal subsistence Regional Advisor Councils (RAC) have also been concerned about the decline of the Central Arctic herd and for the past two cycles the North Slope RAC has submitted Wildlife Special Action requests to the Federal Subsistence Board (FSB) to ban the hunting of the CAH by non-federally qualified subsistence users on federal lands. Much of the hunting of the CAH by non-federally qualified subsistence users has traditionally been in the Arctic National Wildlife Refuge.

RHAK has testified at the FSB meetings in opposition to these closure requests and each time the vote was tied, meaning the requests did not pass. If the board chooses to allocate more harvest to nonresidents we expect these Wildlife Special Action requests to continue.



The real reason for the decline in resident hunters and resident harvest is because opportunity has been severely curtailed, especially with the complete elimination of cow harvests and a later season start date. The reduction from 5 caribou to 2 bulls also took away 25 percent of resident harvest opportunity according to F&G data. On top of that, the herd has not been following what in the past was considered their "normal" migration pattern along the haul road. They are more spread out, often to the northwest.

As we all know, you can't predict what caribou will do, and perhaps the CAH will return to its "normal" migration route and become more accessible off the haul road.

**Proposal 82 – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep
5AAC 92.530 (X) Management Areas**

Establish the Arctic Village Sheep Management Area and open a new resident and nonresident drawing hunt for sheep

SUPPORT AS AMENDED

We have long supported opening up this area again to sheep hunting. If the Board passes this proposal we request that no more than 10 percent of the permits go to nonresidents.

Proposal 129 - 5AAC 92.540(3)(H)(ii) Controlled Use Areas

Change the closure dates for the Yanert Controlled Use Area (CUA) and clarify whether horse feed is considered "hunting gear"

SUPPORT

This is a RHAK proposal stemming from a member request. The Board should review the original reasons for not applying a certain timeframe to the Yanert CUA closure period, as they do with other CUAs, particularly the Wood River CUA. We believe there is no longer a reason for a year-round closure to all motorized land vehicles.

Beyond that, with the closure in place year round, those with moose camps in the Yanert CUA who use horses to hunt have been told by wildlife troopers that they can't even haul in hay via snowmachine in winter to feed horses because hay falls under "hunting gear" according to the regulation. We ask the Board to clarify whether hay is actually "hunting gear."

Proposal 146 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Allocate up to 10 percent of DC 827 permits to nonresidents

It came to our attention that the number of permit applications for the DC 827 caribou hunt has dramatically increased since the Board changed the regs to allow for 6 applications per person. Hunt bookers are flooding the system with nonresident applicants to where



nonresident applications are four times that of resident applications, giving residents much less a chance of drawing.

Something should be done so that residents have a draw permit preference to hunt this herd.

Thank you to Board of Game members for your service, and Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)
www.residenthuntersofalaska.org
info@residenthuntersofalaska.org



Submitted By
Janet Rhodes
Submitted On
2/18/2020 9:28:38 PM
Affiliation

1. Proposal 152 is NOT an attempt to expand the park and this is NOT an issue of federal overreach. We are asking, as Alaskan citizens, that the Board of Game honor its mandates to manage for all Alaskans, including non-consumptive users. This is an attempt to reduce the risk on wolves that venture onto state lands, **during those weeks and months from February until summer, when research finds they are consolidating their family groups, mating, and establishing territories, and when the death of a breeding wolf is most damaging to the integrity of the pack.**
2. **Approving this proposal is well within the interests and mandates of the Board of Game**
 1. **Statewide policy recognizes both consumptive and non-consumptive management options.**

“...ADF&G will manage wolf populations to provide for human uses and to ensure that wolves remain an integral part of Interior Alaska’s ecosystems. Compatible human uses include hunting and trapping (both for personal use and commercial sale of furs), photography, viewing, listening, and scientific and educational purposes (ADF&G 2002). The aesthetic value of being aware of or observing wolves in their natural environment is also recognized as an important human use of wolves. We also recognize that integral to wolf management is the premise that wolf populations are renewable resources that can be harvested and manipulated to enhance human uses of other resources. Management may include both the manipulation of wolf population size and total protection of wolves from human influence...”
Species Management Report and Plan ADFG/DWC/SMR&P – 2018-30
 2. The Denali region, and specifically the Stampede townships, are by history, science and public opinion the **ideal state lands on which to practice non-consumptive use of wolves.** Furthermore, there is nothing in the Board of Game policies that prevents managing at a sub-population level.
3. **This is not a subsistence issue.** Wolf hunting and trapping in the area identified for closure in Stampede lands does not satisfy the eight criteria for Customary and Traditional Use (5 AAC 99.010).
4. In Alaska, wolves are among the most desired species for viewing, and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing. More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park.
5. From 2000 to 2010, the Alaska Board of Game (BOG) approved the closure of certain areas adjacent in the Stampede Corridor to the park boundary to wolf hunting and trapping year-round in order to protect wolf viewing opportunities in the park. In 2010, members of the BOG **removed the buffer** protections and requested more information and research into the relationship between hunting of wolves in the Stampede corridor and wolf sightings within Denali National Park Service and Preserve (DNPP) (“Unit 20C Wolf Closure Proposals” 2010). In September 2010, the National Park Service, with collaboration from the Alaska Department of Fish and Game embarked on a 5-year study of the relationship of wolf harvest adjacent to the park boundaries on wolf population and pack dynamics and on wolf viewing opportunities (Borg 2015).

Based on this research, Denali National Park found that **the presence of the no-trapping and hunting buffer zone during 2000-2010 was associated with increased wolf sightings in Denali National Park** compared to 2011-2013 and 1997-2000 (Borg et al 2016). Both the wolf population size and an index measuring the number of wolves denning near the park road, which were strongly associated with increased wolf sightings, were also greater during the period when the buffer zone was in place. Thus, the presence of the buffer may have increased local population size and the likelihood that wolves would den near the park road.

6. **Non-consumptive users are Wildlife viewing also brings an important socio-economic benefit to the state of Alaska,** with wildlife viewing activities in Alaska supporting over \$2.7 billion dollars in economic activity in 2011. Forty percent of visitors to Alaska reported hoping to view wild wolves during their visit. (ECONorthwest 2012).
7. The average number of people hunting and trapping wolves in the proposed closure **is less than two people per year over the last 20 years.** Those average two individuals would only lose 29% of their access to wolf hunting and 50% of their access to wolf trapping (in days) in this area. It is important to note that wolf hunting and trapping opportunities are still available in surrounding game units— this would not preclude people from trapping anywhere else outside this small area during the breeding season. The impact on trappers is extremely minimal. Annually, well **over 400,000 people visit DNPP** (Fix, Ackerman & Fay 2012).
8. When it existed, the old buffer did not decrease the average annual number of wolves hunted or trapped in UCUs overlapping the Stampede Corridor (UCUs 502, 605, 607), in fact wolf take was higher during the years the buffer was in place (Alaska Department of Fish & Game 2013). During the presence of the buffer zone, hunting and trapping of wolves adjacent to DNPP was on average greater than during the period without the presence of the buffer zone. Simultaneously, the buffer was associated with substantially increased wolf sightings (Borg et al 2016).



9. We recognize that this proposal does not remove all risks to wolves. However, given the almost unlimited tak current Fish and Game hunting/trapping regulations, those local wolves that are most viewed and studied **remain vulnerable to disruption and possible complete loss of the pack.**
10. This proposal does not assert a biological emergency or population-level crisis. It is meant to **prevent disruption of wolf packs during late winter and spring**, making it more likely that their denning activities inside the National Park are completed successfully.
11. **We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. Opportunity for both consumptive and non-consumptive users is provided within this proposal.**



Submitted By
Tyler Riberio
Submitted On
2/20/2020 9:31:10 AM
Affiliation

Proposal 49: Strongly Oppose

This proposal will have a negative impact on bowhunting opportunity in the Interior and Eastern Arctic region, and ultimately the entire state. The State of Alaska already allows individuals with disabilities to apply for “Methods and Means Exemptions” to use crossbows during archery seasons. This proposal is simply a way to circumvent that process.

Further, an elderly individual is able to draw a 50-pound compound bow to full draw. Once at full draw, most modern compound bows employ at least 80% let-off. This equates to the individual holding approximately 10 pounds of draw weight. This is well within the ability of most seniors. If it isn't, these individuals have the ability to apply for the Methods and Means Exemptions described above.

The State already has a plethora of any-weapon hunts available for crossbow use. This proposal is meant to incrementally free the use of crossbows in archery only hunts across the State. This will negatively impact the opportunity of true archers to harvest animals, and I recommend that you disapprove this proposal.

Proposal 50: Strongly Support

This proposal is in the best interest of the State. Bowhunting in Alaska has shown relatively low harvest success. This fact, coupled with the employment of already existing antler restrictions, will result in a *de minimis* impact on moose populations in the region. It will, however, provide increased revenue to the state and local business through increased hunter participation. This proposal will particularly increase non-resident interest in Alaska. I recommend that you approve this proposal.

Proposal 53: Strongly Support

This proposal will increase hunter interest in Alaska sheep hunting, thereby increasing revenue for the State and local outfitters. The proposal will have little impact on wildlife due to the low success of archery hunting, particularly on sheep. This proposal, in conjunction with Proposal 50, will increase Alaska's competitive edge on other states for non-resident hunter interest and revenue, and I recommend that you approve this proposal.



Submitted By
Kristopher Richard
Submitted On
2/21/2020 6:55:29 PM
Affiliation

Phone
907 953 1567

Email
krichard1122@hotmail.com

Address
PO Box 1144
Kasilof, Alaska 99610

I oppose prop 56. To ban trapping in such a manner would detrimental to my self and many other folks in my community. It would hinder trappers from helping others with wildlife related issues, such as and not limited to beaver damage to private property, roads, and driveways, also coyote and lynx breaking into chicken coops. These are just two examples of how myself and other trappers help folks in my community. Resolving these issues has helped everyone involved understand the importance of trapping, and having people around with the skills and knowledge to have a positive outcome.

Thank for your time. Kristopher Richard, Kasilof AK



Submitted By
Micahel Ritter Jr.
Submitted On
2/18/2020 12:01:46 PM
Affiliation

Phone
574-229-6545
Email
customcreationsstudio@yahoo.com
Address
66615 Walnut Road
Walkerton , Indiana 46574

As an avid archery hunter that has been blessed to visit your state on a number of hunts I want to thank you for your great stewardship. It is evident that past decisions have had the wildlife and it's conservation as the forefront. I acknowledge each of you have greater knowledge in that area than myself and will continue to respect your decisions going forward as they have been fruitful thus far. Thank you for considering my input on some issues you are soon to be making decisions on that, hopefully, will continue the legacy before you of stewardship and wise management.

As a bowhunter, Proposal 49 concerns me. I am an aging bowhunter and I certainly will want to continue to hunt when I am no longer able to do so strictly with a bow so this is not a slight towards other weapons as I believe all weapons are excellent ways to manage wildlife and safely enjoy this creation. Alaska, however already has numerous areas and the VAST majority of tags going towards the use of any weapon including crossbows. My understanding is we are really only talking about 14 tags set aside for archery only AND my understanding is if someone is disabled in such a way they are not able to use a bow they can already apply for an exemption and use a crossbow in lieu of a regular bow. Therefore there really is no reason to add or change this. Doing so will open the door for future hunters that are fully able to hunt with a bow but not willing to put in the practice time to be proficient to flood archery seasons and have a larger impact on wildlife while also reducing the solitude and opportunities for genuine archers. The kill rate of a crossbow is greater than that of standard archery. This will mean an eventual reduction in tags or a drop in quality and quantity of game further reducing the opportunities for all hunters. I understand the temptation to allow this may come from the increased revenue from license sales and hunts to the state. That, however would be short term as the impacts it has on wildlife and the experience lessen.

Proposal 50 on the other hand is one that will bring in, a slight amount more, license sales and booked hunts in the state. Doing so while having a relatively minimum impact, if any, on wildlife and the quality of the hunt. It will occur when temps are cooler does allow for more people to spend more time in the field, which equates to more time in your state spending more money. Most bowhunters including myself are perfectly ok with the same restrictions given during the general seasons even though it would be a harder hunt for a few reasons including having to get closer for an ethical kill and hunting animals that may have already been "educated" during the general season.

Proposal 53 is also a terrific proposal and the same general season restrictions should still apply. Again this provides the same increase in opportunity for hunters with more income to the state and little if any impact on the wildlife. I don't see any downside to these last 2 proposals. In addition, as mentioned in my comments about Proposal 49, if someone is truly disabled they too could, if they apply and are granted permission, hunt with a crossbow during these seasons.

I want to close as I opened, by thanking you for reading this and for your excellent past management. I have been blessed to see and experience the fruits of that stewardship and trust you will continue in that wonderful example.

Respectfully submitted,

Michael L. Ritter Jr.



Submitted By
Doug Robbins
Submitted On
2/18/2020 10:47:36 PM
Affiliation
None

I am submitting a comment in support of Proposal 152 for seasonal closure of units 502, 605 and 607 bounding Denali National Park to wolf hunting and trapping. Seasonal closure of these units will protect wolves during the breeding season, promoting a healthy population of wolves within and outside the National Park.

Hunting and trapping of wolves near the park significantly impacts wolf populations within the park. Little economic value is realized from the hunting. On the other hand, nearly a half-million people visit the park every year with the goal of seeing Alaskan wildlife, and wolves in particular. The economic value of park visitors vastly outweighs the value of dead wolves to a few hunters & trappers.

Alaska's constitution requires the state to manage natural resources for the maximum benefit of Alaskans. Wildlife resources are included in resources that should be managed for maximum benefit of all Alaskans, not a handful of hunters & trappers. Maintaining wolf populations in their natural state is the best way to provide that benefit, through the jobs and revenue of Alaska's tourism industry.



Submitted By
Hope Roberts
Submitted On
2/6/2020 6:59:45 PM
Affiliation

Phone
9073225439

Email
hope.lorena@gmail.com

Address
P.O. Box 3461
Valdez, Alaska 99686

Proposal 143- I support that the ceremonial hunts should be prioritized over any other permitted hunting, by law. Proposal 142- I support that the permit hunt be eliminated. To help sustain the harvest for future generations. Proposal 141- I support the local residents concern for this proposal.



Submitted By
Ron Roper
Submitted On
2/21/2020 9:32:48 PM
Affiliation
n/a

Dear Board Members, Please do not approve Proposal 56 seeking to ban trapping within 1 mile of a house, cabin, dwelling, or mailbox. Approval of this proposal as written would trample on private property owners' rights by prohibiting them from trapping on their own property. This would preclude anyone from using traps or snares to prevent or end depredations on pets or livestock, or from simply exercising their rightful choice to legally trap on their own property. Thank you for considering my opinion.



Submitted By
David K Rush
Submitted On
2/18/2020 7:09:28 AM
Affiliation
Hunter

Phone
907-355-1770
Email
ak_fishin@yahoo.com
Address
13333 S old Knik Harbor Drive
Wasilla , Alaska 99623

Dear Board Members,

Regarding Proposal 112, and 5AAC 85.045. Hunting seasons and bag limits for Moose in Unit 19C. I Oppose this Proposal. This area is very remote and cost my Hunting partners and I thousands of dollars to access this area I can't imagine that anyone paying that kind of money to access this area would be unethical and not report it on there harvest report as this is a very special place to hunt. Currently there are about 10 groups of hunters (50 to 60 people) that hunt this area and due to the logistics to access this area we all know each other and work well together on sharing freight, and passenger flights to the area. We also hold each other accountable for cleaning up waste, maintaining the Farewell Airstrip and making sure everyone reports any unethical behaviors, within those groups are current and retired State Troopers, Anchorage APD Officers, Oilfield workers, Business owners, etc. Some of these folks are serious hunters, while for others it's just a chance to get away from the hustle and bussell of everyday life and really don't care if they harvest an animal or not. the Alaska State wildlife Troopers in this area do a good job of patrolling the area and are always checking the camps and hunters for license, tags to insure everyone is reporting properly. To me and my group of hunting partners we feel proposal 112 is just an Assumption on someone's behalf and has no merit.

Kind Regards David K Rush



Submitted By

Nick Rusnak

Submitted On

2/19/2020 7:50:34 PM

Affiliation

Phone

808-579-6058

Email

cissyfuss@hotmail.com

Address

PO Box 462

Talkeetna, Alaska 99676

I support Prop 152, please give the wolves a buffer.



Submitted By
william schaffer
Submitted On
2/20/2020 7:15:27 AM
Affiliation
AK resident

Phone
585-671-2323

Email
schaffer1849@gmail.com

Address
PO box 1749
Homer, Alaska 99603

I strongly support Proposal 152 to ensure protections of and for Denali's wolves. It's limitations on hunting and trapping of wolves near the park boundaries are minimal in comparison to the benefits for sustaining the wolf populations within the parks boundaries! This would sustain wolf viewing and support educational opportunities for the visitors to the park as well as maintaining a balanced eco system!



Submitted By

Laurie Schlueb

Submitted On

2/21/2020 4:31:19 AM

Affiliation

My livelihood depends on tourism dollars. One of the primary reasons tourists visit Denali is to see wolves. It's one of the last places in the world. One of two that are easily accessible. I support Proposal 152. Please protect this sustainable sector of our economy- tourism- by supporting Proposal 152, as well.



Submitted By
Scott Schueller
Submitted On
2/19/2020 6:01:15 PM
Affiliation

Phone
906-455-6923

Email
Sdschue@acsalaska.net

Address
PO Box 83798
Fairbanks, Alaska 99708

Scott Schueller Fairbanks, AK Proposal 147 & 148 I would also like to see the brown/grizzly bear hunting season extended to June 30. I agree with both proposals, #147 and #148, and really would like to see a longer brown bear season in the spring. My friends and I have hunted in the same bait stations in 20B for maybe 25 years now and there used to be a lot of black bears. They are all gone now because of all the brown bears moving in. I have all kinds of game cam pictures of brown boars and sows and big cubs and don't see any blackies anymore. There are way too many grizz and they always seem to show up in May. I'm getting sorta tired of feeding them without being able to hunt them.



Submitted By
Christopher Seaman
Submitted On
2/14/2020 11:51:39 AM
Affiliation

I am writing in support of proposal #52 to change nonresident sheep hunting in units 19c and 20a to draw permit only. I am a life long AK resident and hunter. I have hunted unit 19c for sheep the last several years and everywhere you go in the unit there is way too much sheep hunting pressure. Every year I have hunted I have run into several groups of hunters, most of them guided groups and many of them non-residents. Most residents don't have the resources to fly all over the mountains all summer and fall looking for sheep. They do their research from home the best they can, pick a spot and get dropped off to hunt for a week. After waiting to the next day to start hunting they strike out only to find that there are guided hunters in every valley and half of the ridge tops. They don't that the ability to move and end up spending the whole week trying to fine groups of rams that don't have hunters on them. I've run into 3 groups of hunters in a single day before. I have a friend who was hunting with his young son, they spent several days locating a legal ram then waited several hours for the ram to move into a location for a safe shot. His son took a shot at the ram, missed the first shot and was reloading to take another shot when a guided hunter shot the ram from out underneath them. This is completely unacceptable, unsafe and very unprofessional behavior. Requiring non-residents to have a draw tag would also eliminate the ridiculous practice of non-resident guides "guiding" their non-resident guide buddies to a sheep. This practice is just cheating the system and should not be allowed! The bottom line is that 19c is too crowded and at times unsafe. Requiring non-residents to have a draw tag will lower pressure and make 19c huntable again.

Thank you for your time,

Chris Seaman



Submitted By

Alan Seegert

Submitted On

2/20/2020 12:19:49 AM

Affiliation

Hey. Just wanted to support Proposal 152. Last summer was the first year I saw no wolves in Denali. I have been driving there since 1978. I think the available data suggest that ending the taking of wolves from Feb on is likely to benefit the wolves most visible along the road corridor. I'd rather see the Stampede closed to wolf hunting and trapping, as it was in the past, but 152 is a lot better than nothing. Peace out, Alan Seegert



Submitted By
John Shaubach
Submitted On
2/21/2020 10:22:45 AM
Affiliation

In reference to Proposal #56.

This proposal does nothing to reduce user conflict.

This proposal takes away from law abiding trappers and property owners.

This proposal is nothing more than a feel good proposal for those that do not abide by the law and allow their pets to roam free destroying and harassing our states resources.



Submitted By
Bill Sherwonit
Submitted On
2/20/2020 1:02:21 PM
Affiliation
self

PROPOSAL 152, Closure Option 1

I am writing in SUPPORT of PROPOSAL 152, Closure Option 1, which proposes partial hunting and trapping closures on state lands just outside Denali National Park, in an area that once was part of a protective "buffer" area set aside by the Alaska Board of Game (BOG) to protect wolves that venture outside the national park in pursuit of prey.

While I would prefer a full protective buffer, I understand the chances of that happening right now are minimal. I'm among those who believe that a partial closure as proposed will at least protect wolves during their breeding and post-breeding season, a crucial time of year.

I'm among the Alaskans who believe that the BOG should honor its mandate to manage wildlife for ALL Alaskans. And many of us believe that this proposal is a reasonable request to protect wolves that leave the national park in winter during their search for food, and it will protect them during the critical time (from February until summer) when the wolves are breeding, forming family groups, and establishing territories, and the loss of a breeding wolf is most harmful to a family group/pack.

As the board is well aware, its mandate is to provide for both consumptive and non-consumptive "uses" of wildlife, including wildlife viewing, photography, and the enjoyment and appreciation of living animals in their natural habitat. There's abundant evidence that over the years, many of the wolves killed by hunters and trappers on state lands adjacent to Denali National Park are also wolves that are highly valued for their presence inside the national park, and that the killing of breeding wolves on those state lands has greatly harmed the families of wolves (or packs) that spend most of their lives inside the park and which are greatly valued by park visitors, including many Alaskans.

Members of the BOG are also well aware of the issues here, so I won't repeat the many arguments in support of Proposal 152 that other Alaskans are presenting to you. I simply ask the board to take an action that is a more-than-reasonable compromise, one that would help to prevent the death of breeding wolves and disruption of families/packs in late winter and spring.

I thank you for considering my comments, and those of many other Alaskans who are asking the BOG to take a reasonable action that is long overdue and recognize the value of wolves not only to a small number of trappers and hunters, but to others who prefer to experience them alive.

Bill Sherwonit

Anchorage, Alaska



Submitted By
Jim Shine
Submitted On
2/13/2020 1:33:59 PM
Affiliation

Board of Game,

I am writing to voice my support for BOG Proposal #52, which would change the nonresident general season sheep hunts in Units 20 and 19C to draw permits only for nonresident hunters. This proposal is one that resident hunters have advocated that the BOG adopt for years, and provides resident hunters an opportunity to pursue hunting sheep during the general season without the increased pressure and competition from far too many guides in these areas.

Thank you.