



## Alaska Board of Game

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

Dear Reviewer,

September 2022

The Alaska Board of Game (board) will consider the enclosed regulatory proposals during the board meetings scheduled **for January and March 2023**. The proposals primarily concern changes to hunting and trapping regulations for the Southeast Region (Units 1-5) and the Southcentral Region (Units 6-8, 14C and 15). It also includes proposals for annual reauthorizations for antlerless moose hunts and brown bear tag fee exemptions.

The proposals have been submitted by members of the public, organizations, advisory committees, ADF&G, and other agencies. With the exception of minor edits and clarifications, the proposals are published essentially as they were received, with the insertion of the appropriate Alaska Administrative Code citation and a brief description of the action requested. The proposals are presented as brief statements summarizing the intended regulatory changes. In cases where confusion might arise or where the regulation is complex, proposed changes are indicated in legal format. In this format, bolded and underlined words are **additions** to the regulation text, and capitalized words in square brackets are [DELETIONS].

Readers are encouraged to view all proposals in both proposal books as some proposals may affect other regions and units. Proposals are grouped by each meeting to which they pertain (see Proposal Indices). The proposals are listed in the tentative order in which they are expected to be considered during the meeting. The final order of all proposals to be deliberated on, also known as the “roadmap,” will be available approximately two weeks prior to the meetings.

**Public Comment Requested:** Before taking action on these proposed changes to the regulations, the board would like to consider your written comments and/or oral testimony on any effects the proposed changes would have on your activities and interests. The board relies heavily on written comments and oral testimony explaining the effect of the proposed changes. Public comment, in combination with advisory committee comments and ADF&G staff reports, provide the board with useful biological and socioeconomic data to form decisions. Anyone interested in or affected by the subject matter contained in the proposals scheduled for the January and March 2023 meetings are encouraged to provide written or oral comments if they wish to have their views considered by the board. Please review the additional information for providing written comment and testimony to the board on page v.

New this cycle, Boards Support will be utilizing an online form that will allow comments to be uploaded as a file or entered manually. With the new system in place, Boards Support will no longer accept comments via email.

Written comments can be submitted to the board the following methods by announced deadlines:

Online: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)  
Fax: 907-465-6094  
Mail: ADF&G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526 | Juneau , AK 99811-5526

Meeting information, documents, and a link to the audio is available through the Board of Game website at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov) or through the ADF&G Boards Support Section. Please watch the website for notices and updates closer to the meeting dates, or sign up at the same link to receive notices about the Board of Game. Preliminary board actions will also be posted on the website during the meeting, followed by final actions after the meeting.

Persons with a disability needing special accommodations in order to comment on the proposed regulations should contact the Boards Support Section at (907) 465-6098 at least two weeks prior to the schedule meeting to make any necessary arrangements.

Thank you for your interest and involvement with the Alaska Board of Game and the regulatory process.

Sincerely,



Kristy Tibbles, Executive Director  
Alaska Board of Game

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## Guidelines for Written Comments and Public Testimony

The Board of Game (board) relies heavily on information provided by the public. Explaining the effect of the proposed changes help inform the board members for their decisions on the hundreds of proposals scheduled for consideration each year. The following information provides guidelines and helpful tips to be effective with submitting written comments and oral testimony.

### GUIDELINES FOR WRITTEN COMMENTS

Timely submission: Written comments are strongly encouraged to be submitted online at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov), by the set deadline for each meeting, usually two weeks in advance. New this cycle, Boards Support will be utilizing an online form that will allow comments to be uploaded as a file or entered manually. With the new system in place, Boards Support will no longer accept comments via email.

Comments received by the deadline are provided to the board and the public on the meeting information webpages in advance of the meeting. Each public and advisory committee comment is indexed, assigned a public comment ("PC") or advisory committee ("AC") log number, and cross-referenced with proposals. Comments are public documents and part of the board record.

#### Tips for format and content:

- Clearly state the proposal number and your position by indicating "support" or "oppose". If the comments support a modification in the proposal, please indicate "support as amended" and provide your preferred amendment in writing.
- Briefly explain why you support or oppose the proposal to help the board members understand the pros and cons of each issue. Board actions are based on a complete review of the facts involved, not the sum of total comments for or against a proposal.
- For advisory committees (AC), meeting recommendations should reflect why the AC voted as it did. If the vote was split, include the minority opinion. A brief description consisting of a couple sentences is sufficient.
- Include your name and if including graphs or charts, please indicate the source.
- If using acronyms, please state what the acronym stands for.
- Page limits: For on-time comments, up to 100 single-sided pages from any one individual or organization; during the meeting, comments are limited to ten single-sided pages.
- If commenting on multiple proposals, please do not use separate pieces of paper.
- If handwriting comments, write clearly, use dark ink and write legibly. Comments will be scanned and photocopied so please use 8 1/2" x 11" paper and leave reasonable margins.

Comments submitted as Record Copies: Written comments, which are limited to ten single-sided pages, will be accepted during the board meetings. Comments can be submitted via online form, fax, or hand-delivery. Comments received by Boards Support during the meeting will be logged with a record copy ("RC") number and distributed to the board members two to three times each day. As a practical matter, comments submitted during the meeting are likely to receive less consideration from the board than those submitted by the deadline.

More detailed information about submitting comments during the meeting will be provided via advisory announcement as the meeting approaches.

## **GUIDELINES FOR ORAL PUBLIC TESTIMONY**

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Oral hearings are scheduled at the beginning of each regulatory meeting, typically following agency reports, and continue until everyone who has signed up by the announced deadline and is present when called has been given the opportunity to be heard. Advisory Committee (AC) and Regional Advisory Council (RAC) representatives may elect to provide testimony at a later portion of the meetings.

Persons planning to testify at Board of Game meetings must sign up with the Boards Support staff prior to the announced cut-off time. If submitting written or visual content at the meeting to accompany oral testimony, please review the guidelines for submitting written comments. At the discretion of the chair, PowerPoint presentations may be allowed, and will require a hard copy of the presentation be provided to Boards Support staff well in advance.

Once the oral hearing portion of the meeting begins, Boards Support staff will prepare and post a list of testifiers. The chair will call testifiers in the order provided on the list. When it is your turn to testify, please go to the testimony table, press the button on the microphone, and state your name for the record, where you reside and whom you represent, if speaking for an organization. When giving testimony, be sure to reference the proposal number as well as the title or subject matter, and the public comment or record copy log number for any written material accompanying your testimony. Follow the tips for comments shown on page v.

The board utilizes a light indicator system for timing testifiers. When you begin your testimony, a green light will come on. When you have one-minute remaining, a yellow light will come on followed by a red light or buzzer to indicate your time is up. When you are finished speaking, please stay seated and wait for any questions board members may have regarding your comments. Be aware that when you testify, you may not ask questions of board members or of agency staff. This is your chance to make comments on proposals before the board. If board members and/or department staff need clarification, they will ask you questions. **Please do not use derogatory or threatening language or you will not be allowed to continue speaking.**

The board allows testimony for one organization in addition to personal testimony, or AC testimony. Each testimony is allotted its own time. **If you are giving testimony for yourself and an organization or an AC,** you only need to sign-up once entering your name and the group you wish to speak for. When giving testimony for yourself and an organization or AC, state on the record who you are speaking for. For example: give comments for the organization you are representing, then, after stating clearly that you are now testifying for yourself, give your personal comments.

The length of testimony time will be announced on the agenda prior to each meeting and stated by the board chair at the beginning of the meeting. The board typically allows five minutes for oral testimony for an individual or organization and 15 minutes for ACs and Regional Advisory Councils. Time limits on testimony do not include questions the board members may have for you. Preparing and practicing your testimony ahead of time will help ensure you stay within the time limit, while making your points clear.

Note: Updates related to public testimony and submitting public comments will be provided via advisory announcement prior to each meeting. Please watch the board's website for any updates or sign up to receive announcements via email at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov).



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## About the Board of Game & Advisory Committees

### Alaska Board of Game

The Board of Game (board) is Alaska's regulatory entity authorized to adopt regulations to conserve and develop the state's wildlife resources and to allocate uses of those resources. This includes establishing open and closed seasons, areas for taking game, setting bag limits, and regulating methods and means. The board consists of seven members, serving three-year terms. Each member is appointed by the governor and confirmed by the Alaska State Legislature.

The board considers regulatory topics on a three-year cycle, holding two to three meetings each year to address proposed regulations on a regional basis. Each year, the board solicits proposals for new regulations and changes to existing regulations. Any individual or organization may submit proposals and offer oral and/or written testimony for the board's consideration. More information about the Board of Game members, process and meeting information is online at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov).

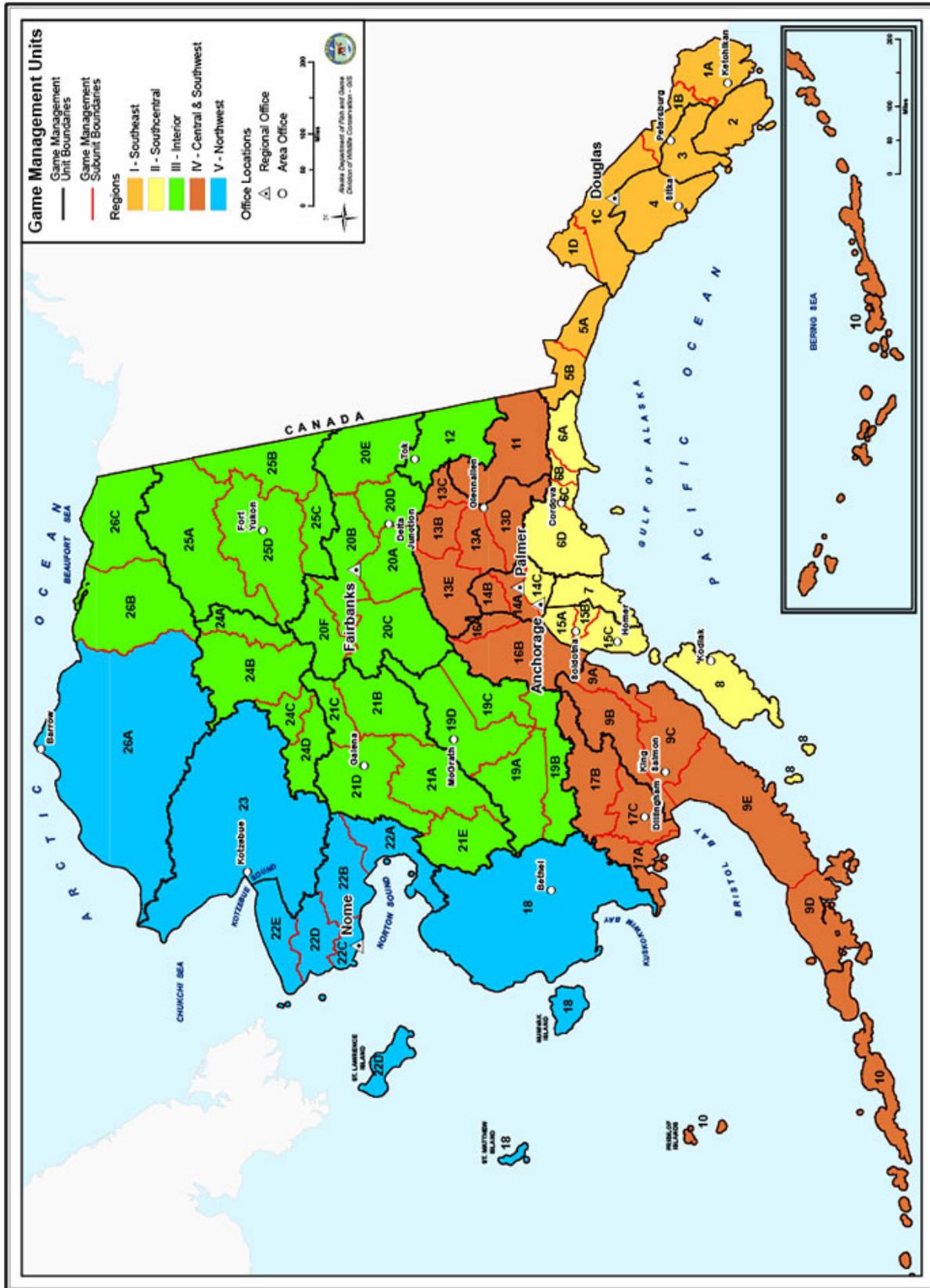
### Advisory Committees

The local fish and game advisory committees (ACs) play a key role in the regulatory process for both fisheries and wildlife management. While the boards make the final decisions on proposed regulations, they rely heavily on ACs to offer their local knowledge on fish and wildlife issues of interest by submitting proposals and comments on proposals.

There are 84 ACs in the state; nearly all actively participate in the state regulatory process as well as the federal subsistence process. ACs have up to 15 members and many have community seats designated under regulation. AC members serve three-year terms and are elected by local community members. ACs begin meeting as early as September and throughout the board meeting cycle to review proposals and submit recommendations to the boards. Meetings are open to the public and meeting information is online at: [www.advisory.adfg.alaska.gov](http://www.advisory.adfg.alaska.gov), or from Boards Support Regional Coordinators.

Boards Support Regional Coordinators facilitate AC participation in the regulatory process by coordinating AC meetings and ensuring the ACs have the necessary information to be effective before the boards. Contact information for the Regional Coordinators can be found on the Boards Support staff listing on page xiv.

# Region and Game Management Unit Boundaries



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**ALASKA BOARD OF GAME**

**2022/2023 Meeting Cycle**

**Tentative Meeting Dates**

<b>Meeting Dates</b>	<b>Topic</b>	<b>Location</b>	<b>Comment Deadline</b>
<b>January 19, 2023</b> (1 day)	<b>Work Session</b>	<b>Ketchikan</b> The Landing Hotel	<b>January 13, 2023</b>
<b>January 20 - 24, 2023</b> (5 days)	<b>Southeast Region</b> Game Management Units 1, 2, 3, 4 & 5	<b>Ketchikan</b> The Landing Hotel	<b>January 6, 2023</b>
<b>March 17 - 21, 2023</b> (5 days)	<b>Southcentral Region</b> Game Management Units 6, 7, 8, 14C and 15	<b>Soldotna</b> Soldotna Sports Complex	<b>March 3, 2023</b>

Total Meeting Days: 11

**Agenda Change Request Deadline: Monday, November 1, 2022**

*(The Board of Game will meet via teleconference to consider Agenda Change Requests following the November 1 deadline.)*



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**Long-Term Meeting Cycle**

The Board of Game meeting cycle generally occurs from November through March. The board considers changes to regulations on a region-based schedule that cycle every three years. When the regional regulations are before the board, the following regulations are open for consideration within that region:

- Trapping Seasons and Bag Limits -- All species
- General and Subsistence Hunting Seasons and Bag Limits -- All species (Except antlerless moose hunts as noted below)
- Intensive Management Plans
- Closures and Restrictions in State Game Refuges
- Management Areas, Controlled Use Areas, and Areas Closed to Hunting and Trapping
- Changes specific to Units or Regions under 5 AAC Chapter 92, excluding Game Management Unit Boundaries under 92.450

Proposals pertaining for the reauthorization of all antlerless moose hunts, 5 AAC 85.045, and all brown bear tag fee exemptions, 5 AAC 92.015, are taken up annually. Changes having statewide applicability to 5 AAC Chapter 92 listed on the following page, Game Management Unit boundaries, and 98.005 dealing with antlerless moose reauthorizations are considered at the Statewide Regulations meetings.

The proposal deadline is May 1 every preceding year. If May 1 falls on a weekend, the deadline is the Friday before. Boards Support issues a “Call for Proposals” generally in January before the May 1 deadline, which will also specify which regulations are open for proposed changes.

<b>Topic &amp; Meeting Schedule</b>
<p><b>Southeast Region - Game Management Units: 1, 2, 3, 4, 5</b>  <i>Meeting Cycle: 2022/2023 2025/2026 2028/2029</i></p>
<p><b>Southcentral Region - Game Management Units: 6, 7, 8, 14C, 15</b>  <i>Meeting Cycle: 2022/2023 2025/2026 2028/2029</i></p>
<p><b>Western Arctic / Western Region - Game Management Units: 18, 22, 23, 26A</b>  <i>Meeting Cycle: 2023/2024 2026/2027 2029/2030</i></p>
<p><b>Interior and Eastern Arctic Region - Game Management Units: 12, 19, 20, 21, 24, 25, 26B, 26C</b>  <i>Meeting Cycle: 2023/2024 2026/2027 2029/2030</i></p>
<p><b>Central and Southwest Region - Game Management Units: 9, 10, 11, 13, 14A, 14B, 16, &amp; 17</b>  <i>Meeting Cycle: 2024/2025 2027/2028 2030/2031</i></p>
<p><b>Statewide Regulations*</b> (see next page)  <i>Meeting Cycle: 2024/2025 2027/2028 2030/2031</i></p>
<p><i>*5 AAC 92.037. Permits for falconry is scheduled every six years: 2027/2028 2033/2034 2039/2040</i></p>

**ALASKA BOARD OF GAME**  
**Statewide Regulations ~ 5 AAC Chapters 92 and 98**

**General Provisions & Definitions:**

- 92.001 Application of this Chapter
- 92.002 Liability for Violations
- 92.003 Hunter Education and Orientation Requirements
- 92.004 Policy for Off-Road Vehicle Use for Hunting and transporting game.
- 92.005 Policy for Changing the Board of Agenda
- 92.008 Harvest Guideline Levels
- 92.009 Policy Obstruction or Hindrance of Lawful Hunting or Trapping
- 92.990 Definitions

**Licenses, Harvest Tickets, Reports, Tags, & Fees:**

- 92.010 Harvest Tickets and Reports
- 92.011 Taking of Game by Proxy
- 92.012 Licenses and Tags
- 92.013 Migratory Bird Hunting Guide Services
- 92.018 Waterfowl Conservation Tag
- 92.019 Taking of Big Game for Certain Religious Ceremonies

**Permits:**

- 92.020 Application of Permit Regulations and Permit Reports
- 92.028 Aviculture Permits
- 92.029 Permit for Possessing Live Game
- 92.030 Possession of Wolf Hybrid and Wild Cat Hybrids Prohibited
- 92.031 Permit for Selling Skins, Skulls, and Trophies
- 92.033 Permit for Science, Education, Propagative, or Public Safety Purposes
- 92.034 Permit to Take Game for Cultural Purposes
- 92.035 Permit for Temporary Commercial Use of Live Game
- 92.037 Permit for Falconry (to be *addressed every 6 years*)
- 92.039 Permit for Taking Wolves Using Aircraft
- 92.040 Permit for Taking of Furbearers with Game Meat
- 92.041 Permit to Take Beavers to Control Damage to Property
- 92.042 Permit to Take Foxes for Protection of Migratory Birds
- 92.043 Permit for Capturing Wild Furbearers for Fur Farming
- 92.044 Permit for Hunting Bear w/the Use of Bait or Scent Lures
- 92.047 Permit for Using Radio Telemetry Equipment
- 92.049 Permits, Permit Procedures, and Permit Conditions
- 92.050 Required Permit Hunt Conditions and Procedures
- 92.051 Discretionary Trapping Permit Conditions & Procedures
- 92.052 Discretionary Permit Hunt Conditions and Procedures
- 92.057 Special Provisions for Dall Sheep Drawing Permit Hunts
- 92.061 Special Provisions for Brown Bear Drawing Permit Hunts
- 92.062 Priority for Subsistence Hunting; Tier II Permits
- 92.068 Permit Conditions for Hunting Black Bear with Dogs
- 92.069 Special Provisions for Moose Drawing Permit Hunts
- 92.070 Tier II Subsistence Hunting Permit Point System
- 92.071 Tier I Subsistence Permits
- 92.072 Community subsistence Harvest Hunt Area and Permit Conditions

**Methods & Means:**

- 92.075 Lawful Methods of Taking Game
- 92.080 Unlawful Methods of Taking Game; Exceptions
- 92.085 Unlawful Methods of Taking Big Game; Exceptions
- 92.090 Unlawful Methods of Taking Fur Animals
- 92.095 Unlawful Methods of Taking Furbearers; Exceptions
- 92.100 Unlawful Methods of Hunting Waterfowl, Snipe, Crane
- 92.104 Authorization for Methods and Means Disability Exemptions

**Intensive Management and Predator Control:**

- 92.106 Intensive Management of Identified Big Game Prey Populations
- 92.110 Control of Predation by Wolves
- 92.115 Control of Predation by Bears
- 92.116 Special Provisions in Predation Control Areas

**Possession and Transportation:**

- 92.130 Restrictions to Bag Limit
- 92.135 Transfer of Possession
- 92.140 Unlawful Possession or Transportation of Game
- 92.141 Transport, Harboring, or Release of Live Muridae Rodents Prohibited
- 92.150 Evidence of Sex and Identity
- 92.151 Destruction of trophy value of game required in specific areas.
- 92.160 Marked or Tagged Game
- 92.165 Sealing of Bear Skins and Skulls
- 92.170 Sealing of Marten, Lynx, Beaver, Otter, Wolf, and Wolverine
- 92.171 Sealing of Dall Sheep Horns

**Use of Game:**

- 92.200 Purchase and Sale of Game
- 92.210 Game as Animal Food or Bait
- 92.220 Salvage of Game Meat, Furs, and Hides
- 92.230 Feeding of Game
- 92.250 Transfer of Musk oxen for Science and Education Purposes
- 92.260 Taking Cub Bears & Female Bears with Cubs Prohibited

**Emergency Taking of Game:**

- 92.400 Emergency Taking of Game
- 92.410 Taking Game in Defense of Life or Property
- 92.420 Taking Nuisance Wildlife

**Game Management Units:**

- 92.450 Description of Game Management Units

**Antlerless Moose Reauthorization:**

- 98.005 Areas of Jurisdiction for Antlerless Moose Season



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**Alaska Board of Game Members**

<u>NAME AND ADDRESS</u>	<u>TERM EXPIRES</u>
Jerry Burnett, Juneau, Chair <a href="mailto:Jerry.burnett@alaska.gov">Jerry.burnett@alaska.gov</a>	6/30/2024
Stosh (Stanley) Hoffman, Bethel, Vice- <a href="mailto:Stosh.hoffman@alaska.gov">Stosh.hoffman@alaska.gov</a>	6/30/2023
Al Barrette, Fairbanks <a href="mailto:Allen.barrette@alaska.gov">Allen.barrette@alaska.gov</a>	6/30/2025
Lynn Keogh, Wasilla <a href="mailto:Lynn.keogh@alaska.gov">Lynn.keogh@alaska.gov</a>	6/30/2023
Jake Fletcher, Talkeetna <a href="mailto:Jacob.fletcher@alaska.gov">Jacob.fletcher@alaska.gov</a>	6/30/2023
James Cooney, Eagle River <a href="mailto:James.Cooney@alaska.gov">James.Cooney@alaska.gov</a>	6/30/2024
Ruth Cusack, Chugiak <a href="mailto:Ruth.Cusack@alaska.gov">Ruth.Cusack@alaska.gov</a>	6/30/2025

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Alaska Board of Game members may also be reached by contacting  
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 Email: [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov) | Phone: (907) 465-6098  
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**Alaska Department of Fish and Game**  
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## BOARDS SUPPORT SECTION STAFF LIST

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### HEADQUARTERS

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### REGIONAL OFFICES / REGIONAL COORDINATORS

#### Southwest Region

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**Southeast Region** (South of Frederick Sound)  
Henry Leasia (see above contact info)

**Southeast Region** (North of Frederick Sound)  
Annie Bartholomew (see above contact info)

[www.adfg.alaska.gov/index.cfm?adfg=process.regcoordinators](http://www.adfg.alaska.gov/index.cfm?adfg=process.regcoordinators)

# Southeast Region

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**ALASKA BOARD OF GAME**  
**Southeast Region Meeting**  
**The Landing Hotel, Ketchikan, Alaska**  
**January 20-24, 2023**

**TENTATIVE AGENDA**

**Note: This Tentative Agenda is subject to change throughout the course of the meeting.** It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

**Friday, January 20, 8:30 a.m.**

OPENING BUSINESS

Call to Order / Purpose of Meeting  
Introductions of Board Members and Staff  
Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

**THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting.**

Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

**Saturday, January 21, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

BOARD DELIBERATIONS upon conclusion of public testimony

**Sunday, January 22, 9:00 a.m.**

BOARD DELIBERATIONS upon conclusion of public testimony

**Monday, January 23 8:30 a.m.**

BOARD DELIBERATIONS continued

**Tuesday, January 24, 8:30 a.m.**

BOARD DELIBERATIONS conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

**Agenda Notes**

- A. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-6098 no later than two weeks prior to start of the meeting to make any necessary arrangements.

# **Regionwide & Multiple Units**

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## **PROPOSAL 1**

### **5 AAC 92.003. Hunter education and orientation requirements.**

Require certified hunter safety education to hunt in Units 1 - 5 as follows:

Amend Section 5 AAC 92.003 to include:

Beginning January 2025, a person born after January 1, 2010 that is required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 1, 2, 3, 4, and 5. Additionally, if you are under 18 years of age, you must have either successfully completed a certified hunter education course or be under the direct immediate supervision of a licensed hunter who is: (a) 18 years of age or older and has successfully completed a certified hunter education course OR (b) born on or before January 1, 2010.

**What is the issue you would like the board to address and why?** Requiring a certified hunter education course to hunt in Units 1, 2, 3, 4, and 5 will lead to safer more informed hunters. ADF&G reports that “hunter education courses have dramatically reduced hunting related firearms accidents — up to 75% in some states — and have brought about positive change in hunter skills, attitudes, and behavior.” Over the last twenty years, barriers to accessing hunter education course have come down, especially with the advent of hybrid and online versions of the curriculum. We would like to follow other Units and require hunter safety for Units 1 - 5. Adopting this proposal will make hunting safer for everyone in our region.

**PROPOSED BY:** Juneau-Douglas Fish and Game Advisory Committee (EG-F22-118)

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## **PROPOSAL 2**

### **5 AAC 92.003. Hunter education and orientation requirements.**

Require hunter orientation for hunting goat in Southeast Region units as follows:

All hunters must complete the goat hunter orientation prior to hunting. Orientation and quiz are available online at XXXXXXXXXX.

-Rocky Mountain Goat alliance has a YouTube video and are currently making another revision to assist goat hunters. I have asked the board if they would work with ADF&G biologists on a video and quiz and they are in support.

**What is the issue you would like the board to address and why?** I believe that there will be a “trickle down effect” from the dwindling sheep numbers, where many sheep hunters will now look to other species. I believe that goat hunting will become more prevalent over the next few years. My concern is that with the increase in goat hunting, there will be an increase in novice goat hunters. This is of grave concern for the harvest of nannie and sub-adult goats. I believe an educational video, such as was done for bear and moose, should be mandatory for all goat hunts.

**PROPOSED BY:** Brian Watkins (EG-F22-008)

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**PROPOSAL 3**

**5 AAC 92.165. Sealing of bear skins and skulls.**

Remove the requirement for residents to seal black bear skulls harvested in Units 1 - 4 as follows:

Eliminate the need for resident black bear hunters in Units 1 - 4 to have black bear skulls sealed.

**What is the issue you would like the board to address and why?** The regulation to require resident black bear hunters to have black bear skulls sealed should be eliminated. This is unnecessary burden on resident hunters such as myself that live far away from a sealing officer. I live on a boat and cruise to remote southeast Alaska locations.

Sealing nonresident black bear skulls should provide enough information for ADF&G. It would be reasonable to have resident hunters report their kill as to where, when, and what sex was taken.

**PROPOSED BY:** Mark Freshwaters (EG-F22-117)

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**PROPOSAL 4**

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

Change the resident bag limit for brown bear in Unit 1 to one bear every two years as follows:

Change the harvest limit for resident brown bear in Unit 1, from one brown bear every four years to one brown bear every two years.

**What is the issue you would like the board to address and why?** Currently Southeast Alaska residents can only harvest one brown bear every four regulatory years and this needs to change in order to align with the ADF&G mission to manage wildlife. There is no data or science showing that brown bears in Unit 1 have any population concerns, but rather have high densities and actually show evidence of population increase in areas on the Chilkat Peninsula, Tracy Arm, Endicott Arm, and south to Port Houghton (Scott 2009). As a year-round sportsman, I have seen the increase in older brown bears on trail cams which supports the trend of an increasing population. The Southeast Brown Bear Management Plan has not been changed in over 20 years and the one every four years was initiated in 1968 with no update to this timeframe in over 50 years. To further support this change, it has been shown that when RB063 and RB073 (Berners Bay area) went from one bear every four regulatory years to one bear every regulatory year in 2013, the harvest did not increase in an area that is close to, and easy to access by Juneau residents. Registration permits provide accurate in season management data to help managers monitor harvest closely. In the event that managers felt that too many bears were being harvested, they can always issue an emergency order. In other areas of the state, Unit 13 for example, liberalizing the brown bear harvest actually helped the overall numbers of brown bears (the land only has so much carrying capacity for large apex predators) as well as bolstered ungulate populations. Another need for this change is that British Columbia has not allowed any hunting of brown bears since December 2017.

This change will benefit the wildlife as well as resident hunters.

**PROPOSED BY:** Jesse Ross (EG-F22-103)

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**PROPOSAL 5**

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

Change the waterfowl season in Units 1 - 4 by creating a split season as follows:

5 AAC 85.065. (a)(4)(A) Duck (B) Sea Ducks (C) Geese, Canada and cackling combined (D) Geese, White-fronted (E) Geese, Light (Snow and Ross’) (F) Brant (H) Cranes (I) Snipe

Season split recommendations will be determined through advisory committees and presented to the Board of Game at the January 2023 meeting.

An example configuration of a two-segment ‘split’ open season for Units 1 - 4: Sept. 1 – Nov. 23; Dec. 9 – Dec. 31

**What is the issue you would like the board to address and why?** At the Southeast Region meeting in 2019, the Board of Game (board) adopted an amended proposal to set the season dates in Units 1 - 4 (Southeast Migratory Bird Hunt Zone) for hunting migratory game birds to September 16 – December 31 in even numbered years and September 1 – December 16 in odd numbered years. This action by the board was intended to accommodate a public desire to better align hunting opportunity with species-specific abundance corresponding to the general fall movement and winter settling patterns of migratory game birds (e.g., hunting early season migrants vs. late season wintering birds). Federal regulations prohibited the board from considering a two-segment or ‘split’ season configuration (open – closed – open) to address the issue – Alaska is allowed a single split season, which at the time was assigned to the Kodiak Zone (Unit 8). A split season is structured with a mid-season closure to extend the early and/or late hunting dates, within the federal framework season length of 107 days.

The current regulation of odd-even numbered year season dates creates a regulatory burden in the Southeast Zone via inconsistent interannual season dates that adds complexity for hunters, enforcement, and the regulations publication process. In addition, the current regulation reduces early or late season hunting opportunity in alternating years by shifting between early and late open/closed season dates. In even numbered years, hunting opportunity for early migrant game birds is reduced and likewise in odd numbered years, opportunity is reduced for late migrant species that winter in the Southeast Region, such as sea ducks.

Since the 2019 Southeast Region meeting, federal regulations were modified to reassign Alaska’s single split season option from the Kodiak Zone to the Southeast Zone (Units 1 - 4), allowing this option to be considered in state regulation. Accordingly, the department recommends implementing a split season in Units 1 - 4 to hunt migratory game birds. The benefit of this regulation change is establishing a consistent set of interannual season dates, thereby reducing regulatory complexity, while allowing in-season early and late hunting opportunity to satisfy better hunting season alignment with species-specific abundance.

The department proposes a regulation change that includes replacing the current regulation of odd-even numbered year season dates in Units 1 - 4 with a two-segment ‘split’ season structure; open on September 1 – closed for up to 2 + weeks – reopen until the end of 107 days for:

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-057)

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**PROPOSAL 6**

**5 AAC 84.270. Furbearer trapping.**

Lengthen river otter trapping seasons in Units 1 - 4 to align with Unit 5 as follows:

Extend and unify river otter seasons across Units 1 - 5 to November 10 - March 31

**What is the issue you would like the board to address and why?** Extend and unify river otter seasons across Units 1-5 to November 10 - March 31. This would be the same as Unit 9, which is at a similar latitude. Fur primeness is related to the amount of daylight, so having similar seasons for similar latitudes makes sense. River otters are not widely harvested in Units 1-5, so while an expansion of the season has the potential to deplete localized populations, the overall population will likely see no impact

There is some concern that river otters might be having kits during this proposed season extension, though in my experience with otter bycatch while targeting beavers, only otters in May exhibited signs of recent birth.

**PROPOSED BY:** Nicholas Orr (EG-F22-102)  
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**PROPOSAL 7**

**5 AAC 84.270. Furbearer trapping.**

Extend marten trapping seasons to align with wolverine seasons in portions of Units 1 - 4 and 5 as follows:

Marten season would become November 10 – February 28 for the following areas: Units 1 - 3 (except Kuiu Island); Remainder of Unit 4, and Unit 5.

**What is the issue you would like the board to address and why?** Extend the marten season to line up with the wolverine season. This would allow marten bycatch in wolverine traps to be retained. It would also allow people who are out deer hunting to participate in marten trapping, as the early part of the season extension overlaps with the deer rut.

Fur primeness is related to daylight hours and is likely to be prime in the proposed extended season. British Columbia Regions 6 and 7 (which roughly line up latitude-wise with all of Southeast Alaska) have a season of November 1 – February 28, not unlike the proposed season in this proposal.

**PROPOSED BY:** Nicholas Orr (EG-F22-104)  
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**PROPOSAL 8**

**5 AAC 84.270. Furbearer trapping.**

Extend the marten trapping season in Units 1 and 2 as follows:

Marten trapping season:

<b>Units</b>	<b>Open Season</b>	<b>Bag Limit</b>
Units 1-2	Dec. 1 – Feb. 28	No Limit

**What is the issue you would like the board to address and why?** The Ketchikan Fish and Game Advisory Committee would like the board to address the marten trapping season for Units 1 and 2. The current season dates are December 1 – February 15. The Ketchikan AC would like the board to consider changing the end date to February 28.

We would like to see this change made for the following reasons. First of all, the fur is still prime, and the majority of marten trapping occurs along roads and beaches, therefore there is still plenty of un-trapped habitat for marten to breed in and remain undisturbed. Also, with fur prices down, trapping effort has gone down, which means less pressure and stress on the population. Lastly, wolf and wolverine trapping is still open, so it would be beneficial to trappers to be able to take advantage of as much opportunity as possible while out checking their trapline.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (EG-F22-110)  
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**PROPOSAL 9**

**5 AAC 84.270. Furbearer trapping.**

Extend the wolverine trapping season to March 15 in Units 1 - 5 as follows:

Area Units 1 - 5

Open wolverine trapping season November 10<sup>th</sup> – March 15<sup>th</sup>

**What is the issue you would like the board to address and why?** We would like to extend the wolverine season in Units 1-5 to gain back some trapping days lost during previous Board of Game meetings.

The 2007-08 meeting cycle changed the start date for hunting wolverine in Southeast AK from November 10<sup>th</sup> to September 1<sup>st</sup> (41 more days). The meeting cycle of 2009 – 2010, the mostly resident trapper lost 75-76 days at the end of the wolverine season in Southeast AK from April 30<sup>th</sup> to February 15<sup>th</sup>. The 2015-2016 meeting cycle the state gave back 13-14 days (February 28/29<sup>th</sup>). This return of days still has trappers short 60 days.

We have not heard of a female wolverine being caught in the month of April with milk or a bad pelt.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-019)  
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# Sitka Area – Unit 4

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## PROPOSAL 10

### **5 AAC 85.030. Hunting seasons and bag limits for deer.**

Decrease the bag limit to four deer in Unit 4, Remainder as follows:

Decrease bag limit for deer in Unit 4 Remainder (the area outside of the area of Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages into Tenakee Inlet) from six deer to four deer.

**What is the issue you would like the board to address and why?** Decreasing the bag limit would have minimal impact on most sport hunters while reestablishing a clearer priority for federally qualified subsistence hunters. Returning the bag limit to the historically more common four deer should reduce conflict between rural and urban hunters.

Background: In 2019, the Alaska Board of Game voted to increase the deer bag limit in Unit 4 from four to six deer, replacing a four deer bag limit that had been in place since 1992. While ADF&G data suggest the Unit 4 deer populations are healthy, and that there remain populations that satisfy what the Board of Game calls “amounts necessary for subsistence,” federally qualified hunters have noted that they are finding it more difficult to meet their subsistence needs. Title VIII of the Alaska National Interest Lands Conservation Act mandates that the Federal Subsistence Board ensure that “subsistence needs” are met. In the latest round of the Federal Subsistence Board process, federally qualified hunters have cited conflicts with non-federally qualified hunters, asking for broad closures of federal land to non-federally qualified hunters. To help avoid such drastic closures, advisory committees, advocacy groups, and individual Juneau hunters have volunteered to work with federally qualified hunters as well as the Federal Subsistence Board to reduce these conflicts and find compromises--this proposal represents part of that effort.

While reducing the bag limit will likely have minimal impact on the deer population or individual hunter harvests, it will encourage more conservative approaches while discouraging individuals from taking more than is needed, especially when deer populations are most vulnerable.

According to ADF&G data, from 1997-2019 the estimated average annual harvest in Unit 4 has been 5,725 deer. Harvest has remained fairly stable, with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout Unit 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season. Very few individual non-federally qualified hunters harvest a six deer limit in Unit 4; however, there are conditions when it is possible to take this many deer in a single day. These conditions typically coincide with deep snow, which forces the deer to the beach—that is, precisely when the deer are most vulnerable to overharvest and winterkill, as these data from the 2006/2007 winter suggest. Finally, as there is not much hunting effort in Unit 4 from hunters outside of Southeast Alaska, this change would impact almost exclusively residents of Juneau.

**PROPOSED BY:** Kevin Maier

(EG-F22-081)

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## **PROPOSAL 11**

### **5 AAC 85.030. Hunting seasons and bag limits for deer.**

Decrease the bag limit to four deer in Unit 4, Remainder as follows:

General Season

Unit 4, Remainder

Residents and Nonresidents

Bag limit: **four** deer total (see details in season dates below)

Season dates:

Bucks: August 1 – September 14

Any deer: September 15 – December 31

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** I would like to address concerns with deer hunting harvests across Unit 4 by reducing the bag limit for both residents and nonresidents to four deer in Unit 4 Remainder. Until the last Southeast Region meeting in Petersburg, the bag limit for deer in Unit 4 was set at four. This bag limit was broadly accepted across the region and has provided enough meat for individuals and families for years, even decades. The four deer bag limit also was successful through population declines due to bad winters in the mid-2000s'. Unit 4 is special because of the quality of habitat and the lack of natural predators. The four deer bag limit is a success in how stable it has been over the years and well the deer have done.

Having lived in Southeast Alaska for almost 70 years, I remember many years where hunting has not been as good as it has been recently. I also remember times when hunting was pretty good, like it has been for the past few years. I have watched the habitat change over the years both for the better and worse. I've lived and worked with generations of biologists and different Boards of Game, I was just a kid in the early days of statehood. Through most of it all, the four deer bag limit was successful in taking care of the deer population and keeping my family with enough opportunity to eat well.

The recent proposals to close deer hunting to folks in Juneau, Ketchikan and the rest of the world in large parts portions of Unit 4 sadden and trouble me deeply. How did we get here when we have a healthy deer population? There have been times when we had more hunters in the field than now. It used to be in the old days boats were slower and hunters hiked more. Maybe some of the "crowding" we see has to do with how focused hunters have become on hunting the beach instead of climbing up in the muskeg. What I do know is that a four deer limit worked for a long time and I'm sure it will work again.

A four deer limit in Unit 4 Remainder is sustainable in good years and bad years and that is what matters most. This proposal will take us back to a tried-and-true bag limit for deer in Unit 4. On the allocation side, I hope my friends and neighbors across the region can come together and share the country with each other like we always have done. Folks in Juneau and Ketchikan enjoy deer meat too and a lot of those folks have kids who are learning to hunt. Why is it that adults are working to cut the country up for themselves and cut out the kids? There are many folks in Juneau and Ketchikan that grew up in areas that might be closed by the feds. As far as subsistence goes, southeast Alaska has an abundance of fish and game to this day. I think four deer per hunter is a

good number when you factor in all the other animals we can harvest and the opportunities we have to use proxies for old-timers who can't hunt for themselves anymore. I never have been worried about "only" being able to take four deer when you factor in all of our opportunities.

Even if this proposal has no effect on the federal closures it is still important to consider. Four deer per person is a good number. A family of four hunters can take 16 deer per year with this limit, a nice amount of deer meat. If the feds decide to cut out Alaskans, well, then the only legal place to take deer will be below the tideline. All of this is a tragedy putting Alaskans against Alaskans when we have enough deer to go around. If there is an opportunity to pass this proposal and keep the lands open to hunting like they always have, I urge you to act. I also urge you to act if this proposal will help with the feds because there will be less country to hunt and a four deer limit worked for a long time.

**PROPOSED BY:** Paul Johnson (EG-F22-089)

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**PROPOSAL 12**

**5 AAC 92.510. Areas closed to hunting.**

Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting as follows:

It is proposed to open:

“Mitchell Bay Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area open to the taking of brown bears”.

**What is the issue you would like the board to address and why?** Open the Mitchell Bay Closed Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area currently closed to taking brown bears. We ask that the area be opened due to recent food security concerns brought forward by Angoon community members to the Federal Subsistence Board. The request to close Unit 4 Admiralty Island, west side to the taking of Sitka Black Tail deer by non-qualified subsistence users; reasons stated was the number and access to Sitka black-tailed deer.

It is known and accepted that brown bear prey on deer and fawns each year. Having a large area and complete bay complex immediately adjacent to and just north of the village and City of Angoon where brown bear hunting is closed could be a factor limiting deer numbers available for human harvest. This area also has a landfill that creates human/bear conflicts that could likely be reduced by opening the area around the village to hunting.

Unit 4 brown bear under the direction of ADF&G and the Brown Bear Management Strategy (BBMS) is very well managed at a 4% harvest level and has been under the harvest thresholds for over eight years. If there are private lands within this Controlled Use Area, access to that land should be controlled by the landowner and not the State of Alaska dictating the closed area. There is no biological reason that this area needs to be closed to the taking of brown bear

**PROPOSED BY:** Zach Decker (EG-F22-047)

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## **PROPOSAL 13**

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

Change the RB088 hunt boundary in Unit 4 to include Northeast Chichagof, and increase the allowable harvest for brown bear as follows:

Proposed Regulation:

(Outside drainages) Chichagof Island East Point (57.80'N 134.94 W) following the common Big Game Commercial Services Board Guide Use Area (GUA) line of 04-11 to 58.02'N 135.96 W to 57.96 N-136.09 W following GUA line 04-15 to including Yakobi and other adjacent islands; Baranof Island south and west of a line which follows the crest of the island from Nisemi Point (57°34' N. lat.,135°25' W. long), to the entrance of Gut Bay (56°44' N. lat.,134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

Allow ADF&G under the Brown Bear Management Strategy (BBMS) to increase allowable harvest in these areas and GUA 04-11, 04-16, 04-15 *up to* 15% on their discretion to help reduce brown bear/human conflict and therefore reduce Defense of Life or Property (DLP) loss.

**What is the issue you would like the board to address and why?** Change the RB088 open area to include Northeast Chichagof. This area that is commonly referred to by ADF&G and the USFWS land managers as Northeast Chichagof is inclusive of the City of Hoonah that includes such areas defined by the Big Game Commercial Services Boards as Guide Use Area (GUA) 04-11 and 04-16. Recent wildlife proposal 22-08 to the Federal Subsistence Board to reduce the bag limits of Sitka black-tailed-deer to non-federally qualified users to two bucks indicates local concern of food security for this area. Another Federal Subsistence Board proposal for the Pelican Area (GUA 04-15) to restrict non-local harvest of deer similar to proposal 22-08 has also been submitted over the concern of food security in the area.

Further, Defense of Life or Property (DLP) reports for the last ten years includes 42 brown bear DLP in the GUA 04-11 and GUA 04-16 area reported to Sitka ADF&G. These numbers seem to support the indication that a high number of bears reside in this area.

Year	Sitka	Hoonah NE Chichagof	Angoon
2012	0	3M, 2F	0
2013	1M	2M, 2F	0
2014	1M	1F	0
2015	0	0	0
2016	1M, 2F	2M, 2F	0
2017	3M	1M, 2F	1M
2018	2M, 3F	8M, 5F	1M
2019	1F	1M, 2F	3M
2020	3M	3M, 2F	2M
2021	5M, 8F	4M	0

The regulation for RB088 currently reads:

(Outside drainages) Chichagof Island south and west of a line which follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W. long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line which follows

the crest of the island from Nismeni Point (57°34' N. lat.,135°25' W. long), to the entrance of Gut Bay (56°44' N. lat.,134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

**Note:** The author submitted attachments with this proposal which are available on the Board of Game proposal book webpage at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook) or by contacting the ADF&G Boards Support Section at (907) 465-4046.

**PROPOSED BY:** David Summers (HQ-F22-002)  
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**PROPOSAL 14**

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

Change the brown bear hunt area for RB088 in Unit 4 to include all of Lisianski Inlet drainage as follows:

Proposed regulation reads:

(Outside Drainages) From Point Lucan outside of the Port Althorp closed area following the Althorp Peninsula ridge common line of Guide Use Area 04-15 south and west of a line which follows the crest of the island including Yakobi and other adjacent islands to (57.82701, -135.86404) over to (57. 79173, -135.99264) south and west of a line which follows the crest of the island to Point (57°34' N. lat,135°25' W. long), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

**Note:** The author submitted maps with this proposal which are available on the Board of Game proposal book webpage at [www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook) or by contacting the ADF&G Boards Support Section at (907) 465-4046.

*See red line on the submitted map for illustration.*

**What is the issue you would like the board to address and why?** Change RB088 hunt boundary to follow the common Big Game Commercial Services Board border of Guide Use Area (GUA) 04-15. Opening all of Lisianski Inlet to remain open until May 31. Change in boundary line would allow user to better understand open and closed areas of hunt RB088. This change would align GUA 04-15 hunt area with RB088 regulation. Change in regulation would allow hunters to use both sides of the inlet making the regulation easier to understand.

Current regulation reads:

(Outside drainages) Chichagof Island south and west of a line which follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W.long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line which follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long), to the entrance of Gut Bay (56°44' N. lat.,134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

*See yellow line on the submitted map for illustration.*

**PROPOSED BY:** David Summers (HQ-F22-003)  
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# **Petersburg & Wrangell Area – Units 1B & 3**

## **PROPOSAL 15**

### **5 AAC 92.510(a)(5)(B) Areas closed to hunting.**

Change the description of the Petersburg Road System Closed Area as follows:

5 AAC 92.510(a)(5)

(B) in the Petersburg vicinity, a strip one-fourth mile wide on each side of the Mitkof Highway from mile marker 8.75 of the Mitkof Highway to **mile marker 17.22** [THE CRYSTAL LAKE CAMPGROUND] is closed to the taking of big game, except wolves;

**What is the issue you would like the board to address and why?** The current description of the Petersburg Road System Closed Area is inaccurate. The southern most boundary of the closed area is described as the Crystal Lake campground. While the US Forest Service does maintain a public use facility at mile marker 17.22 of the Mitkof Highway, there is no campground present. Additionally, the name of the public use facility is not consistent and varies on currently available maps from “Blind Slough Campground” to “Bind Slough Picnic Area”.

To avoid confusion, the department proposes correcting the boundary description by replacing Crystal Lake campground with mile marker 17.22 of the Mitkof Highway.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-056)

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## **PROPOSAL 16**

### **5 AAC 85.030(a)(5). Hunting seasons and bag limits for deer.**

Lengthen the deer season in Unit 3, that portion of Mitkof Island within the Petersburg Management Area as follows:

5 AAC 85.030 - Hunting seasons and bag limits for deer.

(2) Unit 3, that portion of Mitkof Island within the Petersburg Management Area

2 bucks **Aug 1** [OCT 1] - Dec 15

**What is the issue you would like the board to address and why?** Currently the Petersburg Management Area’s deer season runs October 1 - December 15 with a limit of two bucks by bow and arrow only. There are no August/September deer opportunities on Mitkof Island and the Lindenberg Peninsula areas of Unit 3. These areas provide the easiest access to locals. Petersburg residents do have nearby August and September deer opportunities in Unit 1B. However, these hunts take a larger time commitment and are often weather dependent as one needs to cross a sizeable body of water with limited areas to safely store a watercraft. By opening the Petersburg Management Area’s deer season August 1 – December 15, it would allow an early season opportunity for bowhunters with limited time and resources and expand opportunity to an area that was created to minimize deer impacts near town.

**PROPOSED BY:** Kaleb Baird (EG-F22-105)

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**PROPOSAL 17**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Establish a fall drawing permit hunt for elk on Zarembo Island in Unit 3 as follows:

**Unit 3, Zarembo Island, October 1 - October 31, one bull elk by drawing permit only, up to 25 permits may be issued.**

**What is the issue you would like the board to address and why?** Establish a drawing hunt on Zarembo Island for elk. Zarembo has become an elk sanctuary with no allowable harvest. Zarembo Island deer population is a valuable food source for local communities and is being displaced by elk populations.

**PROPOSED BY:** Chris Guggenbickler and Jordan Bunes (EG-F22-053)

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**PROPOSAL 18**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Establish a fall, drawing permit hunt for elk on Zarembo, Bushy, Shrubby and Kashevarof Islands in Unit 3 as follows:

Section 5 AAC 85.035 - Hunting seasons and bag limits for elk.

Unit 3, Zarembo, Bushy, Shrubby Islands, and the Kashevarof Islands **UP TO 5 permits will be issued, 1 bull by drawing permit only; Sept. 15 - Oct. 15** [No open season].

**What is the issue you would like the board to address and why?** That portion of Unit 3 that includes Zarembo, Bushy, Shrubby and the Kashevarof Islands is currently closed to elk hunting. Elk dispersed to the area following the Etolin Island introductions and were hunted previously, however numbers were deemed too low to sustain a hunt in 2008. Recently elk sightings and observations in the area have led some to believe the herd is indeed growing and capable of sustaining a limited opportunity bull-only hunt. A limited draw hunt allowing up to five bull permits would allow some opportunity to this resource that is otherwise off limits and in competition for food resources with native deer populations. While a number lower than five permits is the most likely starting place, allowing the department room to adjust up or down on a yearly basis as more is learned about the herd and hunter observations are taken into consideration will be vital to a successful herd and hunt.

Further, the earliest any-weapon season for elk in the state is currently September 25 in Unit 8. Nearby Etolin Island has a bow and arrow only season for elk during the month of September, but any weapon seasons are conducted in October and November. If a Zarembo, Bushy, Shrubby, and Kashevarof Islands season is adopted, there is interest for an earlier season structure including a significant portion of the month of September.

**PROPOSED BY:** Kaleb Baird (EG-F22-109)

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**PROPOSAL 19**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Change the hunt structure for elk on Etolin Island in Unit 3 as follows:

Make the following changes to the Etolin Island elk hunting seasons:

Shorten DE318:

DE318            September 1 - **15** [30]            25 tags            Archery Only

Create a new hunt DE319

**DE319**            **Sep. 16 - 30**            **25 tags**            **Residents Only**

Reduce the number of tags for DE321:

DE321            Oct. 1-15            40 tags

Eliminate DE32:

DE323            [OCT16 - 31            50 TAGS]

Start the registration hunt earlier:

RE325            **Nov. 1 - Dec. 1**

**What is the issue you would like the board to address and why?**

- The Etolin Island elk hunt consistently produces a low harvest.
- The resource is underutilized.
- The vast majority of hunting effort during the month-long archery season regularly occurs within the first two weeks of the season, leaving the latter half of the month largely un-hunted.
- The number of DE321 tags allotted annually creates crowding in the field, effectively diminishing the quality, productivity and safety of the hunt.
- The season dates of both DE323 and RE325 reduce the productivity of the hunts due to short days and typically inclement weather.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-014)

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**PROPOSAL 20**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Split Etolin Island in Unit 3 into two hunt areas for elk as follows:

I would like to recommend Etolin Island be split into two hunt areas. The dividing line would extend from Anita Bay through Burnett Inlet. This would result in a hunt area south of Anita Bay and east of Burnett Inlet which currently attracts the vast majority of effort and harvest. The remainder of Etolin Island north of Anita Bay and West of Burnett Inlet would be a second area. There has been historic harvest in Steamer Bay, Rocky Bay, Three Way Passage and Mosman Inlet.

I would suggest that the archery and registration hunts remain the same, however, the October hunts would include the two new hunt areas. I would also recommend that the current up to maximum of 50 draw permits for DE321 and DE323 would be split with the new subunit to include DE322 and DE324. The split would be determined by the area management biologist.

My suggested split is referenced below.

Unit/Area

### **Hunt Area 1**

**Etolin Island area bounded by a line from Anita Bay to Zimovia Strait, running north to the intersection of Chichagof Passage, west along Chichagof passage to Stikine Strait to the intersection of Clarence Strait, south to Stan Hope Island, east to Fawn Island and north up through Burnett Inlet.**

**One bull by permit DE331, Oct 1st- Oct 15th, up to 10 permits**

**One bull by permit DE 333, Oct 15th-Oct31st, up to 10 permits**

### **Hunt Area 2**

**Etolin Island area bounded by a line from the intersection of Clarence Strait and Ernest Sound, a line running northeast excluding Niblack Islands to the intersection of Zimovia Strait, north to Anita Bay. From Anita Bay south to Burnett Inlet, east of Fawn Island, west to Stan Hope Island, extending to the intersection of Clarence Strait southeast to the intersection of Clarence Strait and Ernest Sound.**

**One bull by permit DE321, Oct 1st – Oct 15th, up to 40 permits**

**One bull by permit DE 323, Oct 16th – Oct 31st, up to 40 permits**

**What is the issue you would like the board to address and why?** The current October hunt structure and level of participation, particularly from Alaska residents and more specifically from southeast Alaska residents is causing congestion, burdensome competition, a loss of hunt aesthetics, resulting in potentially dangerous situations. I would recommend a change in hunt structure to help alleviate these issues.

The vast majority of effort is isolated to the southern end of Etolin Island from Canoe Pass to McHenry Inlet and the mountain peaks and drainages from Mount Shakes, Navy Peak, McHenry Lake and Mt. Etolin. It isn't uncommon to have multiple hunting parties pursuing elk in the same bowl, drainage, beach, inlet or mountain range.

Effort is focused in these areas because of historic harvest and access. In the mid 2000's an average of seven to eight elk were harvested per year by about 50 hunters. In the last several years the harvest rate has been similar but with around 75 hunters participating. The majority of the hunters are hunting in October and with the condensed two week draw seasons crowding is often the result.

Management of this small, isolated elk herd is largely done through harvest data due to the significant difficulty in estimating the population due to the thick old growth habitat and forested

drainages of south Etolin. Due to fiscal constraints, weather, time, distance and habitat, it is exceedingly difficult to accurately estimate elk on Etolin.

By splitting Etolin into two hunt areas and dividing the available up to draw permits I believe it will spread out effort (improve aesthetics, limit conflicts), lead to other viable hunt options (increased opportunity) and provide the Department of Fish and Game with valuable information to better manage the herd I would request the Board consider the following changes to the existing hunt structure to reduce crowding, potential conflict and to restore the aesthetics of the hunt.

**PROPOSED BY:** Matt Allen (HQ-F22-015)

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**PROPOSAL 21**

**5 AAC 92.150. Evidence of sex and identity.**

Eliminate the regulation that excludes broken, damaged, or altered antlers from the definition of spike-fork antlers for Units 1B, 1C and 3 as follows:

**5 AAC 92.150. Evidence of sex and identity(a)** Horns of a Dall sheep must be salvaged. (b) If the taking of a big game animal, except sheep, is restricted to one sex, a person may not possess or transport the carcass of an animal unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except that antlers are considered proof of sex for a deer if the antlers are naturally attached to an entire carcass, with or without the viscera; however, this section does not apply to the carcass of a big game animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed. (c) If a big game bag limit includes an antler size or configuration restriction, both antlers must be salvaged. A person possessing a set of moose antlers with less than the required number of brow tines on one antler shall leave the antlers naturally attached to the unbroken, uncut skull plate. If antlers or horns must be salvaged, they may not be altered before the completion of all salvage requirements, unless alteration is required under permit conditions. [IN UNIT 1(B), THAT PORTION OF UNIT 1(C) SOUTH OF PORT HOBART, INCLUDING ALL PORT HOUGHTON DRAINAGES, AND UNIT 3, A DAMAGED, BROKEN, OR ALTERED ANTLER IS NOT CONSIDERED A SPIKE-FORK ANTLER AS DEFINED IN 5 AAC 92.990.] (d) In those areas where sealing is required, until the hide has been sealed by a representative of the department, no person may possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear. (e) In those areas where sealing is required only for the skull of a bear, a person who possesses or transports the meat of a bear must keep sufficient portions of the external sex organs naturally attached to indicate conclusively the sex of the bear until the skull of the bear has been sealed by a representative of the department.

**What is the issue you would like the board to address and why?** Remove language [In Unit 1(B), that portion of Unit 1(C) south of Port Hobart, including all Port Houghton drainages, and Unit 3, a damaged, broken, or altered antler is not considered a spike-fork antler as defined in 5 AAC 92.990.] from 5 AAC 92.150 to align spike-fork definition with the rest of the state.

**PROPOSED BY:** Chris Guggenbickler and Jordan Bunes (EG-F22-052)

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*Note: Proposal 22 is a combination of seven submissions all requesting elimination of the restriction for using motorized vehicles for the RM038 moose hunt in Unit 1B.*

**PROPOSAL 22**

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Eliminate the restriction for using motorized vehicles for the RM038 moose hunt in Unit 1B as follows:

Delete this special condition completely, as it is no longer necessary.

**What is the issue you would like the board to address and why?** Concerning RM038, there is a special condition. "Hunting with the use of a motorized land vehicle is prohibited in Unit 1B, except to retrieve moose, establish camps, or check boats."

This "rule" was added in 1978, when the area was logged. "Road" hunting afforded easy access to the moose moving into the area. The area has since grown back, providing a lot of cover for the moose, and "road" hunting no longer would provide such easy access to moose.

The area allows for the use of motorized land vehicles for hunting of all other game species. So you may drive a vehicle in this area to hunt deer during moose season.

**PROPOSED BY:** Kris Thynes

(EG-F22-077)

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I recommend that the current no motorized land vehicle hunt stipulation in Unit 1B be discarded. There is absolutely no scientific reason behind the regulation and there is no reason why we shouldn't be allowed to moose hunt the exact same way as everywhere else in the state. Being as this is currently a unique hunt condition, I don't think anything even needs to be worded, just get rid of it and state in the new books that Unit 1B is now open to hunting by any legal means as any other unit.

**What is the issue you would like the board to address and why?** Special condition for general moose hunt in Unit 1B, the prohibition of motorized land vehicles for hunting, except for getting to camp, checking boat, and retrieving a moose once harvested. This regulation is out of date and makes it unfair for certain hunters. Currently there are several moose camps at various pull-offs on the logging roads in the area. Only one of the camps is owned by a resident of Point Agassiz. Frankly the rest of us can't afford to buy campers and move them up the road so we can hunt on foot or on bicycle. I am a resident of Point Agassiz and I am a disabled Veteran. I have a messed up neck, two bad shoulders, a messed up back and cannot ride a bike, or hike far enough up the valley to hunt moose. I spent ten years in the interior where I harvested a moose every year on the remote lake I lived on. Here in Unit 1B I don't have a chance because I can't ride an ATV up the road system to hunt, or my truck. This is the only place in the state where you can't use an ATV or truck. Frankly it is dangerous for me to try to hunt as I can't carry weight on my back because of my disability so I can't carry survival gear.

The area biologist just explained at the last board meeting that this stipulation was created because of a group of drunk driving, night shooting hunters in the 80s' that is a non-issue out here now. Now most the cabin owners and moose hunters are elderly, and they should have just as much of chance to hunt as anyone in the rest of the state. For all those who don't have a moose camper, we can't get to an area of moose, on foot or bike from our residence without hiking or biking all day. How would we be able to turn around and get all the way home to grab a truck or ATV and a winch to safely recover our moose if we could manage to harvest one? That would be wanton waste!!

**PROPOSED BY:** Cody Ledoux

(EG-F22-083)

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The solution would be to allow hunters to use motorized vehicles in regards to hunting moose.

**What is the issue you would like the board to address and why?** The hunt condition regarding moose hunting in Unit 1B saying we can't use motorized vehicles to hunt. It's an out-of-date condition based on events that occurred between individuals decades ago. The scenarios that brought about this hunting condition are obsolete and currently only cause difficulty due to territory hoarding among current hunters, and the inability to travel to better hunting grounds without an established and maintained camp. I am requesting this hunt condition be removed.

**PROPOSED BY:** Faith Nelson

(EG-F22-085)

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The solution is to eliminate the "special conditions" for the Unit 1B's moose hunt. I propose no new regulations regarding the game Unit 1B

**What is the issue you would like the board to address and why?** The issue is the "special condition" rule prohibiting the use of motorized land vehicles in all of game Unit 1B. I would like the board to eliminate this "special condition" rule for the Unit 1B moose hunt. As a long time moose hunter in game Unit 1B. I find this "special condition" rule in a non-controlled use area a rule that serves no purpose other than to limit access for hunters. The fact that this is the only game unit in Southeast Alaska that has this "special condition" makes no sense. In order for me to hunt from my cabin I have to either walk or use a bicycle and travel many miles on a logging road to access the spots I choose to hunt. I can drive my truck on these roads and hunt any other animal in season, but a moose is ruled illegal.

**PROPOSED BY:** Mark Hofstad

(EG-F22-090)

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Legalize the use of motorized vehicles to hunt moose in Unit 1B.

**What is the issue you would like the board to address and why?** I would like to address the no driving of motorized vehicles while hunting moose on the Thomas Bay road system in Unit 1B. The point of it, years ago, was because of it's a small area and lots of hunters used to go there.

However, the habitat has changed the days of driving and hunting. The clear cuts are over, the habitat has grown up, and very few hunters go there anymore because hunting isn't as good as it used be with the lack of moose habitat. Yet jet boats are allowed to drive and hunt the rivers in the same area while road access isn't allowed. Use of vehicles to hunt moose would be beneficial for the residents that live there, as well as anyone else hunting Unit 1B

**PROPOSED BY:** Austin Sollars

(EG-F22-099)

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I recommend deleting the hunt condition, special stipulation that prohibits the use of motorized land vehicles in Unit 1B. There is no scientific reason behind it and it is an unfair rule. There doesn't need to be a new regulation, just make it the same as every other place in the state.

**What is the issue you would like the board to address and why?** There is currently a hunt condition for moose hunting in Unit 1B that doesn't allow land-based motor vehicles for hunting. This is the only place in the state that has this stipulation, and it is ridiculous. This is in Southeast Alaska, in a rainforest where people can die from hypothermia in a day. To not be able to provide enough meat for our family, due to the risks of not being able to carry proper survival gear is just plain stupid. I have lived in Unit 1B, remotely since 2003. I have never been able to moose hunt because the moose live 5 miles from my home, and I have a bad back so I cannot ride a bicycle. We should have the same rights as everyone else in the state.

**PROPOSED BY:** Steve Nelson

(EG-F22-106)

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I recommend that the restrictions on motorized land vehicles, for moose hunting in Unit 1B, be lifted to allow everyone a fair chance at harvesting a moose.

**What is the issue you would like the board to address and why?** Hello, My name is Sidney Nelson. My family lives, off-grid, out at Point Agassiz in Unit 1B. We live on the coast. There is currently a special rule, that only applies to Unit 1B that states you cannot use a motorized land vehicle for moose hunting, until after you shoot the moose. This is an unfair law to anyone who isn't either young and in shape (who can either hike or bike 10 miles to shoot a moose and then back to get a vehicle in time to salvage it before it spoils) or for the 6 or 8 people who are fortunate enough to have a moose camp set up. As anyone who lives out here knows, there are only so many places for a moose camp, those spots have been in use by the same people for dozens of years. There was no new places for our boys to hunt when we moved here in 2003 and there still isn't. The only option would be to hunt with ATVs which should be allowed. We are low income and cannot afford a riverboat, but we do own ATVs. Everywhere else in Alaska you are allowed to hunt using an ATV, here should be no different. Some people are talking about suggesting using e-bikes, that would only allow the rich who can afford a \$1500-\$3000 bike to have another advantage over us. We just want a fair chance to provide for our families.

**PROPOSED BY:** Sidney Nelson

(EG-F22-108)

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**PROPOSAL 23**

**5 AAC 92.085. Unlawful methods for taking big game.**

Allow the use of electric bikes for the RM038 moose hunt in Unit 1B as follows:

**"The use of "E-bikes" with 750 watts or less are permitted for hunting."**

**What is the issue you would like the board to address and why?** Concerning RM038, there is a special condition. "Hunting with the use of a motorized land vehicle is prohibited in Unit 1B, except to retrieve moose, establish camps or check boats."

I would like to allow the use of "E-bikes" in this area . "E-bikes" below 750 watts are considered in many areas of the state and federally to be non-motorized vehicles.

This was presented to the local advisory committee at a public meeting on April 25, 2022 and after discussion the committee voted 7 Yeas, 1 Nay and 3 members abstained.

**PROPOSED BY:** Kris Thynes (EG-F22-075)

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**PROPOSAL 24**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.510. Areas closed to hunting.**

Open the Petersburg Creek drainage of Kupreanof Island in Unit 3 to black bear hunting as follows:

5 AAC 92.510(a)(5)(C)

That portion of Kupreanof Island that includes the Petersburg Creek drainages is closed to black bear hunting **except that: black bears may be taken by resident certified bowhunters who obtain a limited registration permit**

5 AAC 85.015

Kupreanof Island RESIDENT HUNTERS: **Petersburg Creek drainage, one bear by bow and arrow only, April 15 - June 30, UP TO 10 permits will be issued on a first come first serve basis at Petersburg ADF&G office, limit one bear per hunter**

**What is the issue you would like the board to address and why?** Currently the Petersburg Creek drainage of Kupreanof Island is closed to the taking of black bears. Hunters and anglers are allowed to participate in all other forms of recreation in the area. This includes opportunities for moose, deer, wolves, waterfowl, and various fish species, though black bears remain protected. There is some desire from local bear hunters to access this area due to proximity of town and the seemingly high population. A limited access and weapon restricted hunt could provide the necessary opportunity to harvest some bears with minimal interference of and considerations towards other common user groups in the area (sport fishing, fall bear watching, sightseeing, etc.) A spring-only season for certified bowhunters with a limited number of permits (only available at the Petersburg ADF&G office) would allow for a unique opportunity to hunt bears and keep hunter interactions with other user groups at a minimum.

**PROPOSED BY:** Kaleb Baird (EG-F22-107)

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**PROPOSAL 25**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.510. Areas closed to hunting.**

Allow black bear hunting in the Petersburg Creek Drainage area, with season dates to align with Unit 3 as follows:

I would like it to say you can kill black bear in the Petersburg Creek drainage with the season matching the rest of Unit 3.

**What is the issue you would like the board to address and why?** I would like to allow hunting of black bear in the Petersburg Creek drainage.

**PROPOSED BY:** Max Worhatch

(EG-F22-142)

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**PROPOSAL 26**

**5 AAC 85.015. Hunting seasons and bag limits for black bear**

Reduce the permit allocation and bag limit for nonresident, nonguided black bear hunters on Kuiu and Kupreanof Islands in Unit 3 as follows:

DL029 - DL030

Nonresident hunters NOT using a registered guide, not accompanied by resident second-degree of kindred. Reduce nonresident, non-guided draw allocation from 75 to 35 annually.

Nonresident hunter NOT using a registered guide, not accompanied by a resident second-degree of kindred. One black bear every four (or set by Board of Game) regulatory years.

**What is the issue you would like the board to address and why?** Reduce nonresident, non-guided draw from 75 to 35 annually due biological concerns for the black bear population on Kuiu and Kupreanof Island. As well as crowding, interactions and 'conflicts' in the field. Over the last 20 years, there has been a marked, steady, dramatic decline of population and age of bears on the island. Increased harvest and the lack of any substantive population study for the bear population is causing harm to the long-term viability of the island resource. The last population study regarding the black bear resource on Kuiu island was done in the early 2000s by a graduate student. The study, while possibly effective in the areas that it covered, was extrapolated over the entire island that most certainly does not provide equal quality habitat for bears, providing false data that has been relied on for harvest management by ADF&G. Habitat alteration, prolonged high harvest, and wolf predation have caused substantial reductions in the population that have not been addressed or even acknowledged by the managing agency.

At the last southeast Board of Game meeting ADF&G increased available draw limit from 50 to 75 with no new study of bear population. DL029 - DL030 has an extremely high field participation rate. Kuiu has around 18 huntable bays on the island. Kupreanof has six huntable bays. These islands also have around 14 guide outfitters with US Forest Service hunt permit allocation that vary in location of hunts. Over the years hunt draw application service companies and booking agents have been providing hunt services from maps, gear list and local service providers assisting

in the hunt from outside of State of Alaska. Some application service company has been known to accompany their draw application clients successful in the draw on the hunt acting in the capacity of a "Hunt Advisor". This has increased hunters' interest and success in these areas in providing logistical service.

**PROPOSED BY:** Todd Boughner (HQ-F22-001)  
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**PROPOSAL 27**

**5 AAC 92.550. Areas closed to trapping.**

Require 100-yard trapping setbacks along hiking trails and drivable surfaces on Wrangell Island in Unit 3 as follows:

I recommend that a 100-yard no-trapping buffer be implemented around all established hiking trails and drivable surfaces on Wrangell Island.

**What is the issue you would like the board to address and why?** Trapping along highly trafficked roads on Wrangell Island has led to many user conflicts. Implementing a road setback would resolve these conflicts with minimal disturbance to trappers.

**PROPOSED BY:** Tyler Riberio (EG-F22-136)  
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# **Juneau, Haines, Skagway & Yakutat Areas – Units 1C, 1D & 5**

## **PROPOSAL 28**

### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the hunt boundary from Little Sheep Creek to Sheep Creek, for the RG014 goat hunt in Unit 1C as follows:

Unit 1C, that mainland portion draining into the south bank of Sheep Creek, Gastineau Channel south of Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Sheep Creek and Taku Glacier including the south side of Blackerby Ridge encompassed by a line from Observation Peak west along the ridgeline down to the 1,000-foot contour, east along that contour to the north shore of Salmon Creek Reservoir, north of the main drainage into the head of the reservoir following that drainage south and east up to the ridgeline and east to Olds Mountain.

**What is the issue you would like the board to address and why?** Change the boundary line from Little Sheep Creek to Sheep Creek for RG014. Current boundary lines for RG014 (archery only goat hunt) are confusing. The current boundary on the southeast end of the hunt area is Little Sheep Creek. But the upper watershed of Little Sheep Creek is a maze of tributaries and it is impossible to tell if you are in the legal hunt area when in the field. Changing the boundary line to the much larger watershed of Sheep Creek will connect with the existing boundary in a more logical way that matches terrain and will make navigation easier.

Changing the boundary line from Little Sheep Creek to Sheep Creek would marginally increase the size of legal hunt area but would be much less confusing for hunters to stay within the legal boundary. This change is unlikely to substantially increase mountain goat harvest as this change only includes a small amount of additional mountain goat habitat.

**PROPOSED BY:** Peter Robertson (EG-F22-088)  
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## **PROPOSAL 29**

### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Expand the hunt area of the RG014 archery goat hunt in Unit 1C as follows:

I recommend that the hunt area be expanded:

The most preferable expansion of RG014 would be to include the north side of Blackerby Ridge and the entirety of Thunder Mountain/Heintzelmann Ridge. This hunt area includes the area of Thunder Mountain/Heintzelmann Ridge and reduces potential conflicts with goat viewing opportunities associated with the Mendenhall Glacier Recreation Area by limiting the hunt to over the 2000-ft contour. The hunt area would read:

"that mainland portion draining into the south bank of Little Sheep Creek, Gastineau Channel south of Little Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Little Sheep Creek and Taku Glacier including Blackerby Ridge, portions of Thunder Mountain, and Heintzelmann Ridge encompassed by a line from Nugget Mountain northwest to the 2000-ft contour, along that contour around Thunder Mountain/Heintzelmann Ridge and Blackerby Ridge to the northern shore

of the Salmon Creek Reservoir, then following the north shore of the Salmon Creek Reservoir to the main drainage at the head of the reservoir following that drainage south and east up the ridgeline and east to Olds Mountain, then following a line back to Nugget Mountain."

**What is the issue you would like the board to address and why?** RG014 has been a successful example of small population management for goats in areas of higher population in Southeast Alaska. The current hunt area, which is generally limited to the south face of Blackerby Ridge in Juneau, is unnecessarily restrictive for hunters. The area is generally used by hikers which further limits hunter success. In order to reduce the number of user conflicts, I propose that the hunt area under RG014 be expanded.

**PROPOSED BY:** Tyler Riberio (EG-F22-122)  
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**PROPOSAL 30**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula as follows:

Unit 1C Chilkat Peninsula south of south end of Sullivan Island.

Bow only

RG--- August 1 - September 1

**What is the issue you would like the board to address and why?** The southern end of Chilkat Peninsula in Unit 1C season starts September 1. This is when storms typical start and weather plays a huge role in safety and success of a hunt. Most of the bays in the area have little to no protection from wind and seas.

**PROPOSED BY:** Jonathan Geary (EG-F22-073)  
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**PROPOSAL 31**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Lengthen the resident, registration goat hunt in Unit 1C, the Southern end of the Chilkat Range as follows:

Unit 1C Chilkat Peninsula southern portion drainages of the Chilkat Range south of the south bank of the Endicott River:

Residents Only – one goat by registration permit

RG XXX Aug. 1 – Nov. 30

**What is the issue you would like the board to address and why?** Later season for goat in the southern Chilkat Range area of Unit 1C.

The resident goat season for the northern area of the Chilkat Range in Unit 1C is by registration permit and starts on August 1st but the resident goat season for the southern area of the Chilkat

Range doesn't start until September 1st, which is when storms frequent the area, making access from the coast and hunting much more difficult.

According to ADF&G information, over the past five years there were three - nine goats harvested off of the entire Chilkat Peninsula, with very few nannies taken. Goats have increased on the Chilkat Peninsula from the lows of the past and the current harvest quota is not being met, so we see no reason to continue the later season opener for the southern part of the Chilkat Range.

Concerns over the taking of nannies are still present, and the goat "points" method of decreasing the quota when nannies are taken is still in place. We also recommend imposing a requirement that all goat hunters in Unit 1C must watch and pass the ADF&G goat gender identification quiz: <http://www.adfg.alaska.gov/index.cfm?adfg=quiz.mountaingoaquiz>

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F22-021)

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### **PROPOSAL 32**

#### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Restrict hunters who take nanny goat in Unit 1D from hunting goat the following regulatory year in Unit 1D as follows:

The committee would like this regulation to be changed to read the following: **"If a nanny is taken in subunit 1D, the hunter is prohibited from hunting any goats in subunit 1D the following regulatory year."**

**What is the issue you would like the board to address and why?** In Unit 1, the regulations currently read, **"the taking of nannies with kids is prohibited. Taking of males is encouraged."**

There are 22 hunt areas in Unit 1D. Of those 22 subunits, nine of them are one to two point units and three units as of 2021 were closed to goat hunting entirely. These are fragile populations of ungulates. While we do have a huntable population amongst some of the subunits, nearly half of the areas with populations are teetering on the huntable/emergency closure line. Nannies not accompanying a kid can be harvested. The committee wants to see this stopped.

Numbers show that in Unit 1D, people are hunting any goat and not targeting billies. For example, preliminary ADF&G data indicates that 40% of females harvested were done so knowingly, and not a result of misidentification. These numbers have all been extracted from Alaska Department of Fish and Game's harvest data (available publicly on their website). They have shown that in Unit 1D from 2010-2020, 30% (86/284) of harvested goats were nannies. To expand on that, in 2016, 13 of the 28 goats harvested were nannies. That's 46%.

For example, if 50 harvest points were allowed in Unit 1D and 46% of the harvest was females only 35 mtn goats (19M: 16F) could be harvested before the quota was met. However, if all harvest was males then a total of 50 mountain goats could be harvested (50M: 0F). Thus, in this real-world scenario, harvest opportunity could be increased by 15 mountain goats (46%) if only males were harvested!

**PROPOSED BY:** Upper Lynn Canal Fish and Game Advisory Committee (EG-F22-040)

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**PROPOSAL 33**

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

Increase the brown bear bag limit in that portion of Unit 1C of the Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island for resident hunters, from one bear every four regulatory years to one bear every regulatory year as follows:

Unit 1C Chilkat Range mainland north of point Couverden and south of south end of Sullivan Island.

One brown bear, every year by registration permit. Residents Only

RB --- September 15 - December 31

RB--- March 15 - May 31

**What is the issue you would like the board to address and why?** Over the past 25 plus years I've been hunting and fishing in Unit 1C, I've noticed how brown bears are taking over. You can pull into any one bay where you used to see black bear, moose, and deer, now you see 13 brown bear. I see this as a huge issue. We need to manage this area the same as Berners Bay where you can harvest one brown bear every year to help bring back moose, deer, and black bear.

**PROPOSED BY:** Jonathan Geary (EG-F22-072)  
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**PROPOSAL 34**

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

Increase the brown bear bag limit in that portion of Unit 1C of the Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island for resident hunters, from one bear every four regulatory years to one bear every regulatory year as follows:

Unit 1C Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island:

Residents Only – one brown bear every year by registration permit.

RB XXX Sept 15 – Dec 31

RB XXX Mar 15 – May 31

**What is the issue you would like the board to address and why?** Berner’s Bay area of Unit 1C is one brown bear every regulatory year for residents by registration permit but the remainder of Unit 1C including the Chilkat Peninsula is one bear every four years for residents.

There has been an increase of brown bears on the mainland area of the Chilkat Peninsula in Unit 1C, with increased deer predation that has also led to black bears moving into the more upland areas away from the coast, making black bear harvests more difficult. Brown bears are abundant on the mainland Chilkat Peninsula area of Unit 1C and we see no need to manage this area

differently than the Berner's Bay area of Unit 1C, and no need to manage that area according to Unit 4 brown bear management plans.

The Department of Fish and Game can monitor an increase in brown bear harvests should this proposal pass, and if any conservation concerns come to light there are avenues to decrease harvests via a harvest quota and reporting requirements.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F22-020)  
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**PROPOSAL 35**

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

Extend the bear baiting season for Unit 1D as follows:

The new season date for baiting black bears in Unit 1D would read:

"Areas Open for Bear Baiting: Unit 1D

Dates: Apr 15 - **June 30** "

**What is the issue you would like the board to address and why?** I would like to see a longer black bear baiting season in Unit 1D. The black bear season currently only runs another 15 days past the end of the current baiting season. So that we may provide more continuity and less confusion within the regulations, I would like to see the baiting season end the same day as the regulatory black bear hunting season (**June 30**). More fluid and consistent dates make abiding by the law not only easier but also creates a two-week longer window of opportunity for hunters.

Currently, the regulations on page 27 in the 2021-2022 regulations book read:

" Areas Open for Bear Baiting: Unit 1D

Dates: Apr 15 - **June 15** "

**\*\*If for management/enforcement reasons, it would be easier to blanket all of Unit 1 instead of just picking the subunit of Unit 1D specifically, I am not opposed to all of Unit 1 bear baiting dates changing. I am however specifically requesting Unit 1D.\*\***

**PROPOSED BY:** Adam Smith (EG-F22-004)  
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**PROPOSAL 36**

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

Reduce the bag limit for grouse for drainages that cross the Juneau-Douglas Road system in Unit 1C as follows:

Reduce the grouse bag limit to three per day for the drainages that cross the Juneau-Douglas Road System.

**What is the issue you would like the board to address and why?** Increased hunting pressure has led to localized population declines in the sooty grouse. There are multiple reasons for the increased hunting pressure: 1) Advances in outdoor recreation technology has resulted in more capable snow-machines that are able to traverse steeper terrain giving more access to grouse habitat. Similarly, the increased popularity of backcountry skiing has increased the number of users who can access grouse terrain that previously would have remained inaccessible until the snows melted. 2) Hunting shows and social media have highlighting this fun and unique species, and there has been a desire to introduce non-hunters to the sport of hunting with classes and workshops highlighting spring grouse. 3) Declines in the Chinook population has limited the early fishing season opportunities. Chinook fishing frequently doesn't begin until after spring grouse season has closed. Those seeking a spring activity have shifted to grouse hunting. While the population of sooty grouse is stable across southeast Alaska, areas with high hunting pressure are often reduced to only the most inaccessible birds hooting from perilous cliffs.

Sooty grouse is one of the best species to introduce beginners to the sport of hunting. Decreasing the daily bag limit in the most accessible and heavily used areas will help spread out the harvest of grouse between more hunters and will keep more grouse in the areas that beginner hunters are likely to use when introduced to the sport.

**PROPOSED BY:** Peter Robertson (EG-F22-086)  
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**PROPOSAL 37**

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

Reduce the bag limit for ptarmigan for drainages that cross the Juneau Douglas Road system in Unit 1C as follows:

Reduce ptarmigan bag limit to five per day for the drainages that cross the Juneau-Douglas Road System.

**What is the issue you would like the board to address and why?** Increased hunting pressure and lack of population monitoring has caused population declines in ptarmigan in areas with high use. Advances in outdoor recreation technology has resulted in more capable snow-machines that are able to traverse steeper terrain giving more access to ptarmigan habitat. Similarly, the increased popularity of backcountry skiing has increased the number of users who can access ptarmigan terrain that previously would have remained inaccessible until the snows melted.

Further, the current regulation of 20 birds per day gives the illusion that the species is extremely bountiful. Hunters who come upon a flock of birds are unconcerned, and may attempt to take the entire covey because the daily limit is so high. Finally, ADF&G doesn't monitor local populations of ptarmigan or reduce bag limits when weather conditions means brood survival is low and when hunting pressure would be the most detrimental.

**PROPOSED BY:** Peter Robertson (EG-F22-087)  
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**PROPOSAL 38**

**5 AAC 92.520(a). Closures and restrictions in state game refuges.**

Amend the youth hunt for Unit 1C Mendenhall Wetland State Game Refuge as follows:

*“The first two days of the established waterfowl season is open to youth hunters 17 years old or younger accompanied by a licensed hunter 21 years old or older, and both the child and accompanying adult must register with the department.”*

**What is the issue you would like the board to address and why?** The current regulation states that youth hunters must be between ages 10 and 17. I believe this is not necessary and it needlessly excludes many young people from participating in the hunt with their parents or guardians. If a parent or guardian believes a child under 10 is capable of safely hunting under their supervision, there is no need to impose a minimum age. The permit registration requirements for child and adult would remain. The responsible adult must have their hunter's education and refuge permit, so they have passed two tests that cover responsible behavior statewide and locally on the Mendenhall Refuge and they are capable of supervising a child during the youth hunt.

**PROPOSED BY:** Erich Schaal

(EG-F22-111)

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**PROPOSAL 39**

**5 AAC 92.520(a). Closures and restrictions in state game refuges.**

Amend the hunter education requirement for the Unit 1C Mendenhall Wetland State Game Refuge as follows:

*“a hunter for waterfowl on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is under 13 years of age must be accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge,”...*

**What is the issue you would like the board to address and why?** This proposal will address an inadvertent hole in the current rules for youth who want to hunt on the refuge and it will increase a young person’s access to learning about the outdoors and responsible waterfowl hunting. The state provides an exceptional hunters education program through the Juneau School District to all Juneau students in 6th grade. Many young people have parents or other adults in their lives who already hunt on the refuge and they have accompanied these adults since they were very little. Under the current regulations, a 9-year-old can hunt with an adult but when they turn 10, they must be ready to pass the hunters safety course to continue to hunt. This restriction makes no sense, so it’s important to move the hunter education requirements from 10 to 13 because it allows youth to continue to hunt with the responsible adults in their lives and take the hunters education course with their classmates in 6th grade.

As an example, a typical 6th grader will turn 12 during that school year (September 1st through August 30th). By choosing age 13 as the requirement, it means that a youth who turns 12 on September 2nd is not excluded from hunting that coming waterfowl season because they have not taken the hunters education class yet. In speaking with the Juneau School District, the course usually takes place in the spring, therefore 13 is the logical age to correct this issue.

As national organizations like Delta Waterfowl, Ducks Unlimited, and US Fish and Wildlife Service have found, waterfowl hunter numbers in the US have been on a steady decline for the last several decades (see especially <https://deltawaterfowl.org/wpcontent/uploads/2017/03/LoomingCrisis.pdf>). Important efforts are in place to recruit underrepresented groups like women (Becoming an Outdoors Woman) and youth (hunter education courses), and there are efforts to engage with lapsed and new adult hunters, too, but these educational opportunities are not always met with adequate youth-friendly hunting opportunities. Equal access to the Mendenhall Refuge for all youth is very important. This slight adjustment to the regulations will fix this issue.

**PROPOSED BY:** Erich Schaal (EG-F22-113)  
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**PROPOSAL 40**

**5 AAC 92.520(a). Closures and restrictions in state game refuges.**

Allow the take of deleterious exotic wildlife in the Mendenhall Wetlands State Game Refuge as follows:

Amend the closures and restrictions section to the following:

*“(a) Unit 1: The Mendenhall Wetlands State Game Refuge, as described in AS 16.20.034, is closed to hunting, except for waterfowl including snipe and crane during established seasons, **and deleterious exotic wildlife, as defined in 5 AAC 92.990, there is no closed season, except by approved methods for taking migratory game birds or air rifles with nontoxic pellets must be used;** a person may not use any off-road or all-terrain vehicle, motorcycle, or other motorized vehicle, except a boat within the refuge; a hunter for waterfowl **or deleterious exotic wildfire** on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is under 10 years of age must be accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge, **except for deleterious exotic wildlife,** a person must register for a permit annually with the department and demonstrate an understanding of informational materials provided at the time of registration; the permit is valid for all or specific waterfowl hunting zones **and deleterious exotic wildlife** within the Mendenhall Wetlands State Game Refuge, subject to closure at the discretion of the department; a person convicted of a hunting violation within the Mendenhall Wetlands State Game Refuge is not eligible to register for a permit to hunt in the refuge the following year; a hunter on the refuge shall present in the field, upon request, proof of registration; the first two days of the established waterfowl season is open to youth hunters ages 10 to 17 only, and both the child and accompanying adult must register with the department.”*

**What is the issue you would like the board to address and why?** Deleterious exotic wildlife are a serious ecological issue across our nation and the world. These species are almost as destructive as man’s effects on the environment. When the Mendenhall Refuge was created in the early 1990s’, it wasn’t contemplated that Juneau would be impacted by deleterious exotic wildlife

(DEW) and specific protections were not written into the founding documents. I believe this was an honest oversight, but it needs to be corrected. Since then, several deleterious species have arrived in Juneau, specifically the European Starling. While waterfowl hunting, I routinely see flocks of these invaders. Under the current refuge regulations, Starlings may not be legally taken, even during waterfowl season. Other Alaskan refuges have properly allowed for the removal of deleterious exotic wildlife, so the Mendenhall Refuge should allow it as well.

Some people may worry that allowing the removal of DEW will negatively impact the refuge, due to increased hunting pressure. I disagree with this concern. The current refuge rules and use policies have been in place for almost 15 years and the negative interactions between hunters and other user groups have drastically subsided. I contend that the requirement that all hunters are permitted under the current rules will provide the same high level of competency and respect for other users. The impacts will only be felt by these most uninvited invaders and not the Juneau residents who love and frequent the refuge.

My proposal has two allowable methods of taking deleterious exotic wildlife. 1. By approved waterfowl hunting methods (shotgun, bow/arrow, and falconry) and 2. Air rifles with non-toxic pellets. I included air rifles as an approved method to provide a quiet, precise, and non-toxic method for surgical removal of DEW. I realize that allowing the use of a rifle in the refuge may sound dangerous to some people, but it is not. Remember, all hunters will have passed hunters safety (or are supervised by an adult who has) and they are responsible to know what directions are safe to shoot. I will remind the Board of Game that each spring, many Juneau residents head into the hills, behind their homes and around the refuge with .22 rifles looking for spruce grouse. This annual activity does not create safety issues. I'll also remind the Board of Game that federal and state laws for waterfowl hunting are well understood by Juneau hunters and the risk to misuse on the refuge are non-existent.

I've researched the City and Borough of Juneau's code (42.20.050 Discharging firearms) in the refuge and the only limitation is that shotguns are exempt from the 1/4 mile from a road rule while in the refuge. By city code, pellet rifles could only be fired if more than 1/4 mile from a road, and I don't think this is a problem. The sand islands on the refuge are the main target locations for DEW, so I don't see a need to change the city code at this time.

I ask the Board of Game to consider several points:

Please keep the reference to all deleterious exotic wildlife, as defined in 5 AAC 92.990, so that any new species added to the statute in the future can be assimilated accordingly. Carving out one or two species, such as saying "only starlings can be hunted on the refuge," is not a useful management tool. Who knows what new invader will arrive in the future and the sooner an invading species can be eradicated, the better.

Secondly, allowing the use of air rifles is a low-risk addition to the regulations to combat this important issue. Starlings (and all deleterious exotic wildlife) must be eradicated and air rifles are a low impact, highly effective tool to be used by permitted Juneau hunters.

**Alternative Amendment:** If the Board of Game must modify my request, I ask that at the very least, that the regulations be changed to allow the taking of all deleterious exotic wildlife during established waterfowl seasons with approved methods for waterfowl. At the very least, we should be able to remove DEW when we're already out on the refuge hunting waterfowl.

Below are just a few references to the damage caused by the European Starling and why they must be eradicated from the refuge.

In the 2004 document “**HOTSPOTS Bird Survey of the Mendenhall Wetlands,**” the local authors noted the presence of the European Starling and multiple bird species, such as the Mountain Bluebird, who are often directly displaced by the Starling. Starlings are incredibly aggressive, and it has been well documented that they devastate native bird populations as they displace fellow cavity-nesting birds.

<https://www.naturebob.com/sites/default/files/Hotspot%20report.pdf>

**USDA Document on Starling Damages:**

[www.aphis.usda.gov/wildlife\\_damage/reports/Wildlife%20Damage%20Management%20Technical%20Series/European-Starlings-WDM-Technical-Series.pdf](http://www.aphis.usda.gov/wildlife_damage/reports/Wildlife%20Damage%20Management%20Technical%20Series/European-Starlings-WDM-Technical-Series.pdf)

**European Starlings: A review of an Invasive Species with Far-reaching Impacts:**

<https://digitalcommons.unl.edu/nwrcinvasive/24/>

**PROPOSED BY:** Erich Schaal

(EG-F22-116)

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**PROPOSAL 41**

**5 AAC 92.530(23). Management areas.**

Eliminate the Douglas Island Management Area in Unit 1C as follows:

Remove the Douglas Island Management Area in Unit 1C from regulation.

**What is the issue you would like the board to address and why?** This proposal would remove the Unit 1C Douglas Island Management Area from current regulation. There is no science or data suggesting this management area is necessary or effective, particularly as it applies to wolf management. Wolves are transient to and from Douglas by either swimming the Gastineau Channel at high tide or crossing overland at low tide. It is very hard to manage and set a quota for a population of any species, especially one that is very wide-ranging. Wolf predation has reduced the deer population on the island which is estimated using the Department of Fish and Game’s (ADF&G) annual deer pellet survey at two locations on the north end of the island. Douglas Island is used by deer hunters who don’t have boats; it is often where youth and new hunters have relatively easy access. ADF&G data show that the deer populations on Douglas increased when wolves were actively trapped without a quota. Removing this management area from regulation will allow for wolf management using hunters and trappers during the allowed seasons, while removing a burden on ADF&G staff, and potentially increasing deer populations for sport hunting and wildlife viewing.

**PROPOSED BY:** Juneau Douglas Fish and Game Advisory Committee

(EG-F22-082)

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## **Ketchikan Area & Prince of Wales Island – Units 1A & 2**

### **PROPOSAL 42**

#### **5 AAC 85.030. Hunting seasons and bag limits for deer.**

Extend the deer season to December 31, in Unit 1A Remainder as follows:

Make the following changes to:

Unit/Area: Unit 1A Remainder

Bag limit: Four Bucks

Permit/Hunt #: Harvest Ticket

Open Season: Aug. 1- **Dec. 31.**

Note; the only thing that changes is the ending season date from Nov. 30 to Dec. 31.

**What is the issue you would like the board to address and why?** I would like to see more deer hunting opportunity in Unit 1A. Adding one more month of deer hunting to the Remainder of Unit 1A (not to include the Cleveland Peninsula) would aid hunters who have time or financial constraints to fill their deer tags in the current season. The deer season was changed in 2011, shortened by one month to allow the low deer population to recover after the hard winters of 2007/2008. Current harvest data from ADF&G indicates the deer numbers have rebounded.

**PROPOSED BY:** Ed Toribio

(EG-F22-100)

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### **PROPOSAL 43**

#### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Increase the resident bag limit to two goats in Unit 1A as follows:

We propose to allow Alaska residents the opportunity to harvest a second mountain goat in the defined area of RG001, Unit 1A.

- a) Resident Open Season (Subsistence and Nonresident Units and Bag Limits General Hunts) Open Season (1) Unit 1(A), Revillagigedo Aug. 1 - Dec. 31 Aug. 1 - Dec. 31 Island, except that portion (General hunt only) south and west from Donnelly Point to Naha Bay, Roosevelt Lagoon, Naha River, and Heckman Lake, the divide between Heckman Lake and the head of Salt Lagoon and the western shores of Salt Lagoon and George Inlet to Mountain Point 1 goat by registration permit only; the taking of nannies with kids is prohibited Unit 1(A)
- b) **For Alaska residents, a second mountain goat registration permit (Unit 1A) may only be issued if the goat harvested with the first registration permit was a billy. For those hunters who harvested their first goat in Unit 1A the pursuit of a second goat can't occur in the TCA (Trend Count Area) of the original harvest. Taking of nannies with kids is prohibited in Unit 1A.**
- c) **Resident hunters looking to pursue a second goat can receive a second registration permit after presenting the harvest record or sealing documents from their first harvest to ADF&G in Ketchikan.**

If adopted an Alaska resident is only allowed to be issued and in possession of one RG001 goat permit at one time. A second RG001 goat permit will be issued only after successful harvest and sealing of a male mountain goat. If a female goat is harvested on the first permit the hunter is ineligible to receive a second permit. If a second permit is issued the hunter would be unable to hunt in the trend count area (TCA) of the first harvest. The second permit must be hunted in another TCA. The change in regulation would not prevent a hunter from harvesting a female mountain goat with the first permit. It would prevent a hunter who did harvest a female goat on their first registration permit from being issued a second. The second permit would allow for harvest of a male or female goat, harvesting of a female goat with kids is prohibited.

It is our belief that if the board was to implement this change to regulation the increase in hunting pressure and harvest would be minimal. Due to well established limitations such as access, weather, time and resources, only a few local residents would consider and pursue this additional harvest opportunity. For those that would pursue a second mountain goat, it would be another opportunity to secure high quality protein and could lead to distributing effort to other less traditional areas.

For local hunters the ability to harvest a second mountain goat while being required to hunt in a different TCU could lead some hunters to explore and pioneer new areas. Pioneering of new areas utilized by mountain goats will better distribute hunting pressure and help to maintain the aesthetics of the hunt for more individuals. Boots on the ground and the information derived from exploring new hunting grounds would be of value to local wildlife managers.

**What is the issue you would like the board to address and why?** The Ketchikan Fish and Game Advisory Committee would like to increase the bag limit for goats in Unit 1A for Alaska residents to two goats.

Mountain goats are the most under-utilized game species in Unit 1A. Recent modifications in management, namely expanding the number of TCAs from 14 to 43, the use of a sightability correction model and harvest based on a sliding scale are expected to increase harvest opportunity. Modifications in management with current sealing requirements will allow for TCAs to be closed by emergency order when harvest warrants, thus protecting potentially vulnerable populations while maintaining harvest opportunity in other TCAs.

Unit 1A has three distinct goat populations. Two mainland populations are considered native to the Cleveland Peninsula and Misty Fjords. The third population was introduced to Revillagigedo Island from plants in 1983 and 1991. Populations resultant from the plants currently provide registration and draw permit opportunity. Goats are currently distributed throughout all suitable habitat on Revillagigedo. Modifications in management will also allow for the harvest of a greater percentage of the population of an introduced population vs. a native population. Local resident hunters are the largest group currently pursuing mountain goats. From 2013-2017 they represented 50% of successful hunters for an annual average of 16 harvests.

Due to loss of deer hunting opportunity on federal land on Prince of Wales and increasing pressure on Gravina Island and Revillagigedo Island, mountain goats provide a viable hunting opportunity to put meat on one's table and in the freezer for local resident hunters.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-016)  
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**PROPOSAL 44**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Extend the goat season in Unit 1A Remainder as follows:

Extend the current goat season in the Remainder of Unit 1A for RG001 from its current season to allow the month of January to harvest of goats.

Season dates: August 1–January 31 for RG001

**What is the issue you would like the board to address and why?** To extend the current registration goat hunting season in Unit 1A (RG001) to January 31.

The current mountain goat season runs from August 1st to December 31st in Unit 1A Remainder. Extending the season to January 31st would allow 31 additional days to harvest goats within the unit which residents could take advantage of after the deer seasons end on December 31st.

This season would be for both resident and nonresident hunters.

Allowing the season to be extended would allow trappers who pursue furbearers in areas inhabited by goats to hunt goats opportunistically.

Allowing the season to be extended would be beneficial to the local residents as it offers an alternative source of game meat after the deer season is over in Unit 1A.

The most current harvest and effort information from the Department of Fish and Game website done in 2017 states that there were 107 permits issued for RG001 which 66 of those applicants did not hunt.

A solution would be to implement a block management process with goats so that certain drainages may be shut down, but not the entire hunt.

This proposal would advocate for the harvest of goats by local people, but also allow the nonresident and nonlocal hunters to harvest goats during this time of year.

Note all nonresident hunters must be accompanied by a guide or immediate family.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-017)  
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## **PROPOSAL 45**

**5 AAC 84.270. Furbearer trapping.**

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

**5 AAC 92.008. Harvest guideline levels.**

Raise the population objective from 150-200 wolves to 250-350 wolves in Unit 2, and raise the threshold for closing the season from 100 to 200 wolves as follows:

General authority, as applicable: 5 AAC 84.270. (13), 5 AAC 85.056(1), and 5 AAC 92.008.

The annual harvest of wolves in Unit 2 shall be managed to maintain a unit-wide population objective of 250-350 wolves.

In light of this historic data, we suggest the current population objective of 150-200 wolves is both too low and too narrow. It should align more closely with ~250-350 wolves when conservation measures were initially put in place. The goal is to maintain a number that may sustain a significant annual harvest and not lead to a downward spiral in the wolf population.

To that end, and until a more rigorous evaluation of this vulnerable population is completed, we suggest that the Board of Game raise the threshold for season closure from 100 to 200 wolves, and raise the population objective from 150-200 wolves (current), to 250-350 wolves.

**What is the issue you would like the board to address and why?** At the January 2019 Board of Game (BOG) meeting, the BOG adopted a spring wolf population objective between 135-180 wolves in Unit 2. In the discussion record, the lower goal of the population objection (135 wolves) was derived by subtracting 40% of the Department of Fish and Game (department) historic population point estimate. One hundred wolves was set as the lowest acceptable population level for wolves in Unit 2. This was because the BOG believed that there was a 40% maximum mortality that the wolf population could recover from year-to-year, as long as trappers do not take too many adults. The upper limit of the population objective was based on 20% of the low-end population estimate.

The population objectives were adopted by the board in 2019 in step with a new proposal to manage wolves by population objective. The department specifically avoided recommending those objectives, deferring instead to the BOG and the public process. In that process, the BOG referenced wolf population estimates gathered in the 2014 and 2015 season<sup>1</sup>, which was the all-time low point in the Unit 2 wolf population. The department has since adopted the position that these early estimates were likely biased low.<sup>2</sup> On that basis alone, the population objectives need to be revised to reflect the new, more accurate population numbers.

Some history may be useful in revising this objective. The department's research biologist in 1996 published a population estimate for Unit 2 that was based on two different methodologies. One, based on home range modeling, estimated the wolf population at 321. The second, based on empirical observations of wolves from the air, returned a population estimate of 218 wolves. He believed the first method (home range) *overestimated* the population due to the fact that many of the islands in Unit 2 are not permanently occupied by wolves. The second method (empirical observations) was believed to underestimate the population because of heavy wolf harvest in the area preceding the fall 1994 counts. He therefore averaged the two and produced his best estimate of the Unit 2 wolf population at the time: 269 wolves<sup>3</sup> (Roffler et al. 2016).

This population estimate was low enough to raise concerns by the BOG about unsustainable harvest, which at the time, was ranging from 85-105 wolves per year<sup>4</sup>. Consequently, the BOG, in

1997, enacted wolf harvest guidelines that capped legal harvest at 25% of the most recent population estimate.

During the 1980s and early 1990s, the Unit 2 wolf population probably hovered between 250 and 350 wolves, with 30-50% being harvested annually. As the population declined through the 1990s and 2000s, the static harvest cap of 90 wolves (later reduced to 60 wolves) drove the population further downward. In 2014, if the Spatially Explicit Capture–Recapture (SECR) population estimate showed the Unit 2 wolf population numbered just 89 animals.

The department excused itself from establishing a population objective in 2019, preferring, instead, to let local residents set it. The public has no way of knowing wolf carrying capacity, much less what number of wolves might be needed to maintain viability or to provide for a maximum sustained yield.

The decision to set 100 wolves as the minimum did not include a consideration of the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking, susceptibility to rabies and disease; resiliency to harvest over 40%; or resilience to habitat fragmentation and loss from old growth logging. In fact, the department conducted no population viability analysis to support the BOG’s decision to set 100 wolves as the minimum acceptable level.

Since 2019, and in light of new genetic studies, it appears the minimum population number has been on the department’s mind. At a public hearing in Prince of Wales on November 9<sup>th</sup>, 2021, the department representative stated, that “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”

There is no area within Unit 2 where a wolf pack is not exposed to legal and illegal killing. With no evidence of immigration into Unit 2 from surrounding management areas, a small residual population of 100 wolves could be feasibly extirpated, and risks a positive ESA listing decision.

<sup>1</sup> “When setting the current fall population objective (150–200 wolves) the Alaska Board of Game referenced estimates from 2014 and 2015.” (ADF&G press release 10 Nov 2021)

<sup>2</sup> “Although ADF&G’s Unit 2 wolf population estimates have always been reasonable and consistent with the DNA collected, analysis of data from 2019 and 2020 suggests earlier estimates may have been biased low. Along with incremental improvements in capturing DNA from hair samples, in 2019 and 2020 ADF&G first had access to DNA from relatively large numbers of wolves harvested within the study area during the October–December study period. That DNA collected at sealing contributed to larger datasets available for the 2019 and 2020 population estimates and in part, appears responsible for higher estimates in those years. Fewer samples from harvested wolves available for earlier estimates may have biased those estimates low.” (ibid)

<sup>3</sup> Page 9, in: *Roffler, G. H., J. N. Waite, R. W. Flynn, K. R. Larson, and B. D. Logan. 2016. Wolf population estimation on Prince of Wales Island, Southeast Alaska: a comparison of methods. Alaska Department of Fish and Game, Final Wildlife Research Report ADF&G/DWC/WRR-2016-1, Juneau.*

<sup>4</sup> “These results are consistent with observations made in the field by biologists and trappers who believe that wolves on Prince of Wales and Kosciusko Islands were at a population peak during winter 1992-93 and have declined since, owing primarily to trapping and hunting (in GMU 2, 86, 105, 103, 85, and 99 wolves were reported killed during the 1991-92, 1992-93, 1993-94, 1994-95, and 1995-96 trapping seasons, respectively”. From *Person, David K.; Kirchhoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.* Person et al. 1996. *Person, David K.; Kirchhoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-023)  
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**PROPOSAL 46**

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

Lengthen the hunting season for wolves in Unit 2, to open September 1 as follows:

Open to residents and nonresidents:

Five wolves

**September 1st** [December 1st] - March 31st

All wolves taken in Unit 2 must be sequentially numbered or marked by the hunter, the hunter must call the ADF&G office at (907) 225-2475 within 7 days of take to report the date and location of take, and all hides must be sealed within 15 days of take.

**What is the issue you would like the board to address and why?** We would like to see the start of wolf season in Unit 2 start on September 1 to better align with the federal season and to provide additional harvest opportunity.

Wolves are often encountered throughout the deer hunting season in Unit 2. Opportunistic harvest of wolves during this time is prohibited because the current season does not open until December 1.

We believe the department could benefit from the information that would be gathered from wolves harvested prior to the current season start date.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-018)

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**PROPOSAL 47**

**5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.**

Require wolf harvest information be reported within 48 hours of recovery and sealing within 14 days in Unit 2 as follows:

5 AAC 92.170. Adjust the requirement for all wolves taken in Unit 2 to be reported via call in as follows: Wolves taken during either the hunting season or during the trapping season must be called in within 48 hours and sealed within 14 days of harvest.

Require hunters and trappers that kill wolves to call in harvest information to a recorded department line within 48 hours of recovery. As wolves are taken and reported, they should be numbered sequentially to assist the department in censoring the wolf from the mark-recapture study. Very general location data should also be provided in the call-in. Sealing requirement remain the same (within 14 days). An area office, or a wolf sealing station, on Prince of Wales Island would make reporting and sealing requirements easy for the public, and provide other useful information.

**What is the issue you would like the board to address and why?** To manage wolves sustainably, the annual mortality the population experiences must be sustainable. The best way to ensure that is to monitor the harvest during the season, and close it if necessary to avoid over-

harvest. It is a standard management practice with many fish and wildlife populations, especially where the economic valuation is high (e.g. herring), or where the populations are small and relatively vulnerable (e.g. bowhead whales, musk ox). Historically, harvest information has been gathered when hunters and trappers present the wolf hides for sealing, typically within 30 days after the season closes. While presentation of the animal for sealing yields beneficial data (including genetic samples), a late report does not benefit the Spatially Explicit Capture–Recapture (SECR) population estimation technique, nor does it signal to the department when an overharvest is being approached.

The sooner a report is filed with the department, the better they can manage. We suggest a cell phone call to a recorded department line within 48 hours of recovery. This is a light burden to impose and does not affect a large number of people. During RY10–RY14 an average of 12 trappers per year were successful (range 10–17).<sup>1</sup> If one doubles it for safe measure, the reporting burden still falls on relatively few shoulders.

<sup>1</sup> Porter, B. 2018. Wolf management report and plan, Game Management Unit 2: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018- 10, Juneau.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-030)  
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**PROPOSAL 48**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.056. Hunting seasons and bag limits for wolf.**
- 5 AAC 92.008. Harvest guideline levels.**

Change the methodology for setting the population objective for wolves in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85. 056(1); 5 AAC 92.008.

5 AAC 92.008 is amended to read:

The minimum population objective for wolves in Unit 2 shall be based on a biological population viability analysis, using available demographic data.

We recommend that ADF&G contract with a qualified researcher to conduct a population viability analysis for wolves in Unit 2 using available demographic data. From that research, ADF&G recommends a baseline population objective based on the results. This will ensure that the population objective considers genetic diversity (based on the agency’s best available science), resilience to habitat loss or fragmentation, carrying capacity, and other biological factors.

**What is the issue you would like the board to address and why?** In the January 2019 Board of Game (BOG) discussion which set the population objective for wolves in Unit 2, the BOG adopted a spring population objective between 135-180 wolves. In the discussion record, the lower goal of the population objection (135 wolves) was derived by subtracting 40% of ADF&G’s historic population point estimate. One hundred wolves was set as the lowest acceptable limit of wolves in Unit 2. This was because the BOG believed that there was a 40% maximum mortality that the wolf population could recover from year-to-year, as long as trappers do not take too many adults. The upper limit of the population objective was based on 20% of the low-end population estimate.

The population objectives were adopted by the board in 2019 in step with a new proposal to manage wolves by “population objective”. Managing to a population objective is not a flaw, we simply have concerns that the minimum population objective (100 wolves) is inadequate to assure viability over the long term.

The department (ADF&G) excused itself from establishing a population objective, preferring, instead, to let local residents set it. The public has no way of knowing wolf carrying capacity, much less what number of wolves might be needed to maintain viability or to provide for a maximum sustained yield.

The decision to set 100 wolves as the minimum did not include a consideration of the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecks, susceptibility to rabies and disease; resiliency to harvest over 40%; or resilience to habitat fragmentation and loss from old growth logging. In fact, ADF&G conducted no population viability analysis to support the board’s decision to set 100 wolves as the minimum acceptable level.

Since 2019, and in light of new genetic studies, it appears the minimum population number has been on ADF&G’s mind. At a public hearing in Prince of Wales on November 9<sup>th</sup>, 2021, a representative from ADF&G stated that “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”

There is no area within Unit 2 where a wolf pack is not exposed to legal and illegal killing. With no evidence of immigration into Unit 2 from surrounding management areas, a small residual population of 100 wolves could be feasibly extirpated, and risks a positive ESA listing decision.

In sum, even if the minimum number of wolves (100) currently set by the BOG is sustained, there are serious concerns that 100 is too few wolves to provide a viable population. If the population objective, particularly the minimum, does not consider the above-listed conservation considerations, the state risks violating sustained yield principles by not taking what the courts consider a “hard look” at variables influencing a resource’s sustainability.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-024)  
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**PROPOSAL 49**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.056. Hunting seasons and bag limits for wolf.**
- 5 AAC 92.008. Harvest guideline levels.**

Utilize the lower confidence interval of the wolf population for estimating the population in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85. 056(1), 5 AAC 92.008

5 AAC 92.008 is amended to read:

The lower confidence interval of the population estimate shall be utilized for the purposes of estimating the wolf population in Unit 2.

To exercise the state's precautionary management policy in the face of high uncertainty, utilize the lower bound of the confidence interval as the assumed wolf population for purposes of management and quota-setting. To gauge the magnitude of this adjustment, this proposed change would lower the official estimated wolf population size in the fall of 2020 from 386 wolves to 320 wolves.

**What is the issue you would like the board to address and why?** The Board of Game (BOG) is currently utilizing the statistical mean of the Spatially Explicit Capture–Recapture (SECR) analysis as the assumed wolf population for purposes of management and quota-setting in Unit 2. Given uncertainty about the veracity of these population estimates, a more conservative measure is advisable.

The department has acknowledged that the observed changes in the Unit 2 wolf population from year to year, concurrent with reported harvests, are not particularly logical. An experienced trapper on Prince of Wales Island who sits on the Federal Subsistence Regional Advisory Council was succinct: “This roller-coaster ride of population estimates has really upset a lot of people, including myself....Somebody ought to admit there's some shortcomings somewhere.”<sup>1</sup>

Let's examine this “roller-coaster ride” he references, starting in regulatory year 2013<sup>2</sup>, to illustrate why the population estimates for wolves in Unit 2 are questionable:

- In 2013, after 26% of the estimated wolf population was harvested, the population *declined* 60% (unlikely).
- In 2014, after 34% of the estimated Unit 2 wolf population was harvested, the population *increased* 21% (unlikely).
- In 2015, after 6% of the estimated wolf population was harvested, the population *increased* 114% (impossible).
- In 2016, after 13% of the estimated wolf population was harvested, the population *decreased* 3% (possible).
- In 2017, after 27% of the estimated wolf population was harvested, the population *decreased* 24% (unlikely).
- In 2018, after 25% of the estimated population was harvested, the population *increased* 76% (highly unlikely).
- In 2019, after 52% of the estimated population was harvested, the population *increased* 23% (impossible).

The numbers simply do not align. A barely sustainable 26% harvest in 2013 caused wolves to *decrease* 60%, while the same percentage harvest in 2018 supposedly caused wolf numbers to *increase* 86%. A population more than doubling in a single year (2015-2016) is impossible. A harvest of 52% in one year causing wolf numbers to increase 23% the next is impossible.

Year after year, the department reports the new numbers, absent critical thought as to their believability. Their desire to show wolf population increases, and “fight off” a possible listing by the U.S. Fish and Wildlife Service reflects the department's mindset, and a lack of objectivity.<sup>3</sup>

Why these estimates might be wrong is not for the Alaska Wildlife Alliance, or the Board of Game to determine. Any number of assumptions in the SECR methodology may have been violated, and

those violations may differ year to year. But what the Board of Game *must* do is recognize the inherent unreliability of these population estimates, and err on the side of caution when managing wolves on this basis.

The department has sometimes excused these swings by pointing out that these are the means (i.e., point estimates) and that there are quite broad confidence intervals around those means.

Pointing to poor precision as a positive, and as an excuse for population trends that do not make sense, only underscores the basis for our concerns.

Likewise, it is incorrect to claim, as the department does, that because confidence intervals overlap in consecutive years, the population is stable.<sup>4</sup> Failure to detect a decline does not mean there was no decline...it simply means the data were too variable to detect a decline. Declines of 50% or more can be “not significant” if the underlying data are noisy, and the confidence limits excessively large.

It appears the “goodness” of the population estimates is, in the department’s eyes, linked to the value itself. Signs of abundance, or increase, are trustworthy. Signs of scarcity, or decline, are discounted with reference to small sample size, or unrefined methods. Such post-hoc rationalizing damages the department’s credibility.

<sup>1</sup> From transcripts of an ADFG meeting with the regional Advisory Committee, held 20 November 2020.

<sup>2</sup> Data on population size and number of wolves harvested are by same regulatory year, as reported in ADF&G memos and reports, available online. The harvest numbers are for legally reported harvest only. They do not include illegal kills or natural mortality. Regulatory year, population size, and reported harvest are as follows: (2013,221,57) (2014,89,30) (2015,108,7) (2016,231,29) (2017,225,61) (2018,187,44) (2019,316,165) (2020,389,68) (2021, ,64)

<sup>3</sup> “And we need to keep that (cooperation) going, because we have a petition we have to fight off. Like I said, this is the time when we really have to work together to avoid a listing decision. Because this petition is more likely than the last one to end up in a listing decision, just because of how it’s structured.” (*quote from ADF&G Region 1 supervisor, at a 20 November 2020 meeting with the Southeast Regional Advisory Committee*).

<sup>4</sup> “The fall 2019 and fall 2020 population estimates are statistically indistinguishable suggesting that the Unit 2 wolf population is stable.” From: *6 Dec 2021 ADFG memo on Unit 2 Wolf Population update, fall 2020*.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-025)

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## **PROPOSAL 50**

**5 AAC 84.270. Furbearer trapping.**

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

**5 AAC 92.008. Harvest guideline levels.**

Establish a population estimate and harvest limit based on Prince of Wales Island wolf population that excludes extrapolation from outer islands in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270. (13), 5 AAC 85.056(1), 5 AAC 92.008

5 AAC 92.008. is amended to read:

The preseason population estimate of wolves in Unit 2 shall be based on the estimated population of wolves on Prince of Wales Island alone, with no extrapolation for the outer islands in Unit 2.

Estimate the population of wolves on Prince of Wales Island, alone, and set a harvest cap based on this number. This would directly align the trapper effort with the department's population estimate. To the extent that some Unit 2 wolves occur on small islands, they can provide a minor source of immigration to Prince of Wales if and when wolf packs on that island are over exploited. This proposal echoes a recommendation of the interagency wolf technical committee.<sup>5</sup>

**What is the issue you would like the board to address and why?** The wolf population estimates in Unit 2 make untested assumptions about the relative density of wolves on the outer islands, leading to an overestimate of wolves on Unit 2, and a potential overharvest of wolves on Prince of Wales.

The department has little to no data on wolf densities on the outer Islands west of Prince of Wales. Since the Spatially Explicit Capture–Recapture (SECR) genetic population estimation method was developed (first estimate in 2013), > 99% of the cumulative samples (nodes x years) have been drawn from the northern 2/3rds of Prince of Wales Island<sup>1</sup>. Less than 1% of the sample effort is on islands (one, Sukkwan Island, which is separated from Prince of Wales Island by ~ 600 m of protected water).

The department has no samples in 40% of the Game Management Unit, including southern Prince of Wales Island, and scores of medium-sized and highly insular<sup>2</sup> islands to the west. The department justifies extrapolating to these islands with weak statements to the effect that “they have no reason to believe the wolf densities are different”.

That requires willful disregard for evidence from ADF&G wolf and deer researchers who have conducted field work on many of these islands and found wolf use was low and sporadic, especially on smaller, more distant islands. Only the three largest islands—Prince of Wales, Kosciusko, and Dall are large enough to have been continuously occupied by wolves for more than 20 years.<sup>3</sup>

Wolves that must piece together a pack home range by swimming among numerous islands have far greater energetic costs than a wolf pack that merely trots down a logging road. While wolves can swim, the odds of them making long swims (> 2 km), or multiple swims (> 3), or swims in high seas (outer islands) to reach an island too small to sustain a pack are scant. It is telling that when wolves were transplanted by boat to Coronation Island (in Unit 3), they quickly outstripped their food resources and began cannibalizing each other. They lasted 10 years, starving in place rather than swim 900-m of open-water to nearby islands with deer<sup>4</sup>...strong evidence that swimming represents considerable friction to wolf movements.

To assume that wolf habitat use on small islands, requiring multiple or long swims, is equivalent to wolf use on a large, contiguous land mass is contravened by empirical evidence. By ignoring this evidence, the department overestimates the Unit 2 wolf population, and so too overestimates the number of wolves that can be safely harvested.

<sup>1</sup> This summary is derived from maps showing the locations of sample nodes, by year, as reported in annual Departmental memos on the most recent Unit 2 wolf population estimate.

<sup>2</sup> Insularity refers to how likely an island is to be visited, or colonized. Smaller islands are less likely to be inhabited than large islands; and islands that require long swims, multiple swims, or swims in heavy seas are less likely to be inhabited than islands accessible via easy swims.

<sup>3</sup> “Within Unit 2, only the three largest islands—Prince of Wales, Kosciusko, and Dall—are known to have been continuously occupied by wolves for more than 20 years. Wolf packs may include several smaller islands...in their home ranges or may exclusively inhabit smaller islands for a few years, but they are unable to persist permanently”. From: *Person, David K.; Kirchoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

<sup>4</sup> “Wolves failed to cross the 900 m of water to the adjacent Spanish Islands where deer densities remained moderately high throughout the study.” (from *Klein, D. R. (1995). The introduction, increase, and demise of wolves on Coronation Island, Alaska. Ecology and conservation of wolves in a changing world, 275, p. 280.*

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-026)

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## **PROPOSAL 51**

### **5 AAC 84.270. Furbearer trapping.**

### **5 AAC 85.056. Hunting seasons and bag limits for wolf.**

### **5 AAC 92.008. Harvest guideline levels.**

Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days’ notice before closing the season by emergency order as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85.056(1), 5 AAC 92.008.

5 AAC 92.008 is amended to read:

The Board of Game (BOG) is to establish the percentage of the wolf population that can be safely harvested on a sustainable basis. Using the department’s latest available population estimate, and accounting for wolf mortality (natural, legal human harvest, and illegal human harvest), the department develops a harvest quota each season. The department shall monitor the annual harvest of wolves in Unit 2 with in-season reporting. That reported taking shall be tallied and made available so trappers and hunters know whether the harvest quota is being approached. At least three days notice shall be given before a season is closed by emergency. An additional allowance of up to three days may be given if adverse weather conditions require.

This proposal speaks to the management framework only, and adopts the same method that was used to manage wolves in Unit 2 from 1997 through 2018. Returning to that method, with the benefit of annual population estimates, a population objective, more convenient in-season reporting requirements, and a transparent public process represents a significant improvement over the current system. This proposal echoes a recommendation of the Interagency Wolf Technical committee. <sup>2</sup>

It is understood that a majority of lands in Unit 2 (72%) are federal lands, administered by the USDA Forest Service (USFS). The USFS recognizes the state to be the primary manager of game species on federal lands when not in conflict with USFS government regulations. Hence, state regulations apply to all federal and state lands in Unit 2 unless a person is harvesting under federal subsistence regulations. The Federal Subsistence Board (FSB) sets regulations for federally qualified subsistence users on federal lands. In order to reduce regulatory confusion and ensure successful management of game species the FSB often aligns with State regulations. If the BOG adopts this proposal it is likely the FSB will adopt the regulation on federal lands for federally qualified users to avoid regulatory confusion and ensure successful management of wolves.

**What is the issue you would like the board to address and why?** The management scheme that the BOG adopted in 2019 (per the department’s recommendation), which aims to meet wolf population objectives set by the BOG by season length alone, is too blunt to meet the management needs of this wolf population. The current management scheme inadequately controls harvest, and requires annual Emergency Orders to work.

The department manages wolf populations by managing direct human-caused mortality. Mortality is most commonly controlled by limiting the number of hunters and trappers, installing bag limits, or establishing harvest quotas. It can be crudely controlled by adjusting season length, but without bag limits, trappers can take too many animals if conditions are ideal, or too few animals if conditions are poor. It is difficult to consistently and accurately predict the number of trappers that will participate, and the number of animals that will be taken, in a given season.

This was proven in the very first year (2019) the new population objectives management system went into effect. The prior year population estimate was 170 wolves in Unit 2 (or 178, depending on which department report is referenced). Either is squarely within the desired wolf population range of 150-200 wolves. The department had suggested, and the board adopted, a season length guideline of up to eight weeks when populations were in that range. In-season reporting requirements were also rescinded on the mistaken belief that this system would work well without monitoring the kill.

In that first 8-week season, a record 165 wolves were legally harvested and an untold additional number lost to natural mortality, wounding loss, and illegal take. The gross overharvest was shocking, but was explained by the department as being a result of higher-than expected trapper numbers—an admission that reinforces the inadequacy of a season-length only management tool.

To correct for this apparent problem, the department has abandoned the general season-length guidelines the board adopted. Instead, in every season since 2019, the department has shortened the trapping season by a “pre-emptive” emergency order/regulation. In effect, they anticipate the emergency, and substantially shorten the season under emergency authority before it even starts.

Using season length to control harvest amounts to a guessing game. Compounding the problem is the fact that this game now takes place behind closed doors. There is no opportunity for input from the BOG, or the public. The crude nature of this tool leaves wolves at risk. The opaque nature of this tool leaves the public frustrated and distrusting.<sup>1</sup>

<sup>1</sup> Resolution 21-04 by the City of Coffman Cove, passed 4 November 2020.

<sup>2</sup> “Any management plan should include population and **harvest objectives** for wolves, clear direction on how wolf abundance will be estimated and **measurable indicators that will trigger specific management actions** (emphasis added). This larger planning effort would be outside the scope of normal survey and inventory activities and to be successful should be led by ADF&G.” from:

**PROPOSED BY:** Alaska Wildlife Alliance

(HQ-F22-027)

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**PROPOSAL 52**

**5 AAC 84.270. Furbearer trapping.**

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

**5 AAC 92.008. Harvest guideline levels.**

Establish a harvest quota for wolves, between 20% and 35% of the estimated wolf population in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270 (13), 5 AAC 85. 056(1), 5 AAC 92.008.

5 AAC 92.008 is amended to read:

A harvest quota between 20% - 35% of the estimated population of wolves in Unit 2 is established by the Board of Game based on conservation concerns.

As a matter of policy, the Board of Game should establish an allowable percent mortality figure that varies between 20% and 35%, depending on where the current population sits relative to the objective. If the population needs to be reduced to meet population objectives, the Board of Game can institute a 35% mortality guideline. If, on the other hand, there is a conservation concern for wolves, a lower cap of 20% can be instituted.

This approach provides to trappers the maximum possible number of wolves to harvest while honoring the constitutional sustainability requirement, and moving towards the population objective. It is a biologically driven, based on empirical data from Unit 2, and can be set in a clear and transparent fashion by the board. Establishing this percentage is consistent with past practice, and will be even more successful as the department improves on its ability to estimate wolf population size and monitor in-season harvest.

**What is the issue you would like the board to address and why?** Neither the Board of Game nor the department has established a sustainable wolf harvest level for Unit 2.

The department is obligated under the Alaska State Constitution to manage wildlife resources on the sustained yield principle.<sup>1</sup> In common terms, sustained yield means managing for an ongoing annual harvest without jeopardizing the harvest (or yield) for future generations.

The percentage of a population that can be harvested annually, in perpetuity, is driven by various population traits, including age and sex structure, productivity, recruitment, immigration and natural mortality. Where human-caused mortality is compensatory, and immigration likely, human harvest rates of 17-48% of wolf populations can be sustained. If there is no possible immigration (as on Unit 2), or if human-caused mortality is partially additive to natural mortality, sustainable rates are lower—in the range of 22-25%.<sup>2</sup>

In studies of the wolf population on Unit 2, it was determined that in order to maintain current population levels, a level of mortality (from all causes: including natural, legal, and illegal harvest) for wolves in southeast Alaska is 30-35%<sup>3</sup>

The Board of Game has variously set the percentage of sustainable mortality between 20-30%, adopting the more conservative figure in years of particularly acute conservation concerns, and 30% in years of lesser concern.<sup>4</sup>

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<sup>1</sup>§ 4. **Sustained Yield** — Fish, forests, wildlife, grasslands, and all other replenishable resources belong to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses. From: *The Alaska State Constitution*.

<sup>2</sup>“Most studies demonstrate that high rates of reproduction and immigration can compensate for human-caused mortality rates of 17–48% (±8%; Fuller et al. 2003, pp. 184–185; Adams et al. 2008 [29%], p. 22; Creel and Rotella 2010 [22%], p. 5; Sparkman et al. 2011 [28%], p. 5; Gude et al. 2012 [25%], pp. 113–116). However, results of other studies suggest that harvest of wolves by humans are at least partially additive (Murray et al. 2010, pp. 2519–2520), and therefore, sustainable mortality rates may be lower than expected (~22–25%; Creel and Rotella 2010, p. 5). From: *Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.*

<sup>3</sup>“Based on our analysis of birth rates and population size for wolves on Prince of Wales and Kosciusko Islands, we estimate the per capita birth rate for wolves to be approximately 0.33 (SE = 0.15). The buffering effects of immigration and emigration are probably limited for most of the wolves in southeast Alaska; consequently, total annual mortality should not exceed reproduction to maintain current population levels. Thus, to maintain current population levels, a level of mortality (from all causes: including natural, legal, and illegal harvest) for wolves in southeast Alaska is likely to be less than or equal to 30 to 35 percent. From: *Person, David K.; Kirchhoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

<sup>4</sup>Since 1997, there have been 2 years at 25%, 17 years at 30%, and 3 years at 20%.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-028)  
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## **PROPOSAL 53**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.056. Hunting seasons and bag limits for wolf.**
- 5 AAC 92.008. Harvest guideline levels.**

Establish an estimated unreported mortality rate for Unit 2 wolves to be used for establishing the harvest quota as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85.056(1), 5 AAC 92.008.

5 AAC 92.008 is amended to read:

An estimated unreported mortality rate of 35-50% shall be utilized in establishing an annual harvest quota of wolves in Unit 2.

The Board of Game should establish an estimated percentage of unreported mortality in the Unit 2 wolf population of between 35-50%, and count that percentage toward the annual allowable mortality. This proposal echoes a recommendation made by the Interagency Wolf Technical Committee recommends that harvest quotas continue to be adjusted annually for unreported kill.<sup>4</sup>

**What is the issue you would like the board to address and why?** The legal take of wolves in Unit 2 underestimates the total mortality in the wolf population, and thus leaves the state vulnerable to overharvesting a genetically distinct, isolated wolf population.

Wolves die from any number of causes, including legal harvest by trapping and hunting, wounding loss, illegal harvest (wolves killed but not reported or sealed per regulations), and natural mortality. Illegal mortality is particularly difficult to assess because illegal activities are not self-reported, and there is a minimal enforcement presence on Prince of Wales Island. Unreported human-caused mortality has been documented in Unit 2 at rates of 38% (Roffler et al. 2016a) and 47% (Person and Russell 2008) of collared wolves killed by humans (3 of 8 and 16 of 34 wolves, respectively). Causes of death in these unreported instances included gun shot, snare, and trap wounds, though it is important to recognize that data from most of these cases do not speak to intent. Some of these animals may have been injured during attempted lawful harvest but escaped, and so were not successfully recovered and therefore went unreported. Regardless, unreported human-caused mortality exists at fairly high levels in Unit 2. Harvest quotas should continue to account for this.<sup>1</sup>

There may be a bias against reporting killing of radio-collared wolves, which would inflate these numbers somewhat. That acknowledged, it is reasonable to assume that 35-50% more wolves die each year (including natural mortality) than are accounted for in the reported harvest.<sup>2</sup>

Explicit recognition of unreported mortality is not without precedent. For 2015 and 2016 the department documented an apparent decline in wolf numbers and documented a high rate of unreported human-caused mortality (Roffler et al. 2016). Consequently, as a conservation measure, the Board of Game reduced the wolf harvest quota by 50% to account for unreported mortality<sup>3</sup>.

<sup>1</sup> From: *Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.*

<sup>2</sup> *Person, David K.; Kirchoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

<sup>3</sup> *Porter, B. 2018. Wolf management report and plan, Game Management Unit 2: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018- 10, Juneau.*

<sup>4</sup> *Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game*

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-029)

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**PROPOSAL 54**

**5 AAC 92.008. Harvest guideline levels.**

Identify an area in Unit 2 for protected status for wolves as follows:

Under general authority, as applicable: 5 AAC 84.270(13), 5 AAC 85.056(1), 5 AAC 92.008.

Task the department with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas have relatively high deer carrying capacity and are large enough to be buffered from trapping pressure.

**What is the issue you would like the board to address and why?** Managing wolves by population objective requires accurate population size estimates. Tracking mortality requires accurate and timely reporting, as well as an estimate of illegal and natural mortality. Obtaining population and mortality data is difficult and costly, and its accuracy has been questioned.

An alternative is to manage the system spatially. If the wolf population can sustain ~30% annual mortality, then open ~ 1/3rd of the unit to wolf trapping each year and close the remainder. The areas subject to closure, and those that are open, could be established permanently by the Board of Game, or perhaps rotated on a long-term schedule. The goal would be to maintain large enough reserves for two-three packs of wolves to be protected and thereby serve as a source population for the “sink areas” that are producing the 30% annual harvest. Spreading the protected areas across the unit could help maximize genetic diversity.

**PROPOSED BY:** Alaska Wildlife Alliance

(HQ-F22-031)

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# Southcentral Region

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**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Soldotna Sports Center**  
**Soldotna, Alaska**  
**March 17 - 21, 2023**

**TENTATIVE AGENDA**

**Note: This Tentative Agenda is subject to change throughout the course of the meeting.** It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

**Friday, March 17, 8:30 a.m.**

OPENING BUSINESS

Call to Order / Purpose of Meeting  
Introductions of Board Members and Staff  
Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

**THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting.**

Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

**Saturday, March 18, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

BOARD DELIBERATIONS upon conclusion of public testimony

**Sunday, March 19, 9:00 a.m.**

BOARD DELIBERATIONS upon conclusion of public testimony

**Monday, March 20, 8:30 a.m.**

BOARD DELIBERATIONS continued

**Tuesday, March 21, 8:30 a.m.**

BOARD DELIBERATIONS conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

**Agenda Notes**

- A. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-6098 no later than two weeks prior to start of the meeting to make any necessary arrangements.



# **Regionwide & Multiple Units**

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## **PROPOSAL 55**

### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

Reduce resident cow permits and nonresident bull permits for Southcentral Region units as follows:

I would like the board to consider a minimal amount of nonresident draw permits being issued as well as a decrease in the amount of resident cow permits.

**What is the issue you would like the board to address and why?** Due to the increased populous within the Mat-Su Valley and Kenai Peninsula and beyond, and the number of vehicle/moose collisions that have occurred in the past ten years, I would like the board to consider a minimal amount of nonresident draw permits being issued as well as a decrease in the amount of resident cow permits.

Most vehicle/moose collisions occur during winter months and most are assumed to be pregnant cows. Yes, this would affect the guides. But up until about 2006, moose seemed to be highly abundant and were roaming just about everywhere. In the Anchorage bowl, aside from a draw hunt on JBER (Joint Base Elmendorf-Richardson), moose are sanctified within no hunting zones. As we go south on the Seward Highway and north on the Parks and the Glenn Highways, it is apparently obvious that moose numbers have been in drastic decline for at least a decade.

In hopes to eventually increase moose numbers in these areas, which would provide more opportunity resident harvest of legal bulls, I am asking the board to decrease the amount of resident draw cow permits and nonresident bull permits. There's no reason why vehicle/moose collisions should contribute more to charity than local hunters contribute to our families. Thank you for your consideration.

**PROPOSED BY:** Erik Anderson (EG-F22-078)

\*\*\*\*\*

## **PROPOSAL 56**

### **5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Prohibit taking of big game from boats in Units 6, 7, and 15 as follows:

Illegal to take big game from a boat in Units 6, 7, and 15.

**What is the issue you would like the board to address and why?** It is currently illegal to take big game from a boat in Units 1-5, or black bear in Unit 6D. This regulation should be extended to include all big game in Units 6, 7 and 15. This would bring all coastal units in Southcentral and Southeast into conformity.

**PROPOSED BY:** Dave Lyon (EG-F22-091)

\*\*\*\*\*

**PROPOSAL 57**

**5 AAC 92.090. Unlawful methods of taking fur animals ; exceptions.**

Allow the use of dogs to track and retrieve dead or wounded fur animals in Units 6 - 8, 14C, and 15 as follows:

Allow for more efficient and ethical recovery of fur animals in Units 6-8, 14C and 15 as follows:

Fur Animals:

- Fur animals MAY NOT be taken under the hunting regulations by the following methods:
  - with a dog (except coyote in Unit 20D after registering with ADF&G **and in Units 6 - 8, 14C and 15 a dog may be used to track and retrieve dead or wounded fur animals**), trap, snare, net, or fish trap;

**What is the issue you would like the board to address and why?** Next to ethical shots and lethal shot placement, efficient game recovery is paramount. An individual sitting with his dog while calling in a fox is no different than sitting in a duck blind calling waterfowl. In the event that an animal is wounded and evades the hunter, whether it be a duck, goose, fox, coyote, etc., a well-trained retrieving dog should be allowed to be sent to track, locate and retrieve it. There is NO downside to ensuring a mortally wounded animal is not wasted. Currently on page 13 of the Alaska trapping regulation booklet, the use of dogs is allowed for retrieving dead furbearers. The same should be applied to the small game hunting regulations for dead and wounded fur animals.

**PROPOSED BY:** Mike Harris (EG-F22-160)

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**PROPOSAL 58**

**5 AAC 92.003. Hunter education and orientation requirements.**

Require hunter orientation for hunting goat in Southcentral Region units as follows:

All hunters must complete the Goat Hunter Orientation Prior to hunting. Orientation and quiz are available online at XXXXXXXXX.

-Rocky Mountain Goat alliance has a YouTube video and are currently making another revision to assist goat hunters. I have asked the board if they would work with ADF&G biologists on a video and quiz and they are in support.

**What is the issue you would like the board to address and why?** I believe that there will be a “trickle down effect” from the dwindling sheep numbers, where many sheep hunters will now look to other species. I believe that goat hunting will become more prevalent over the next few years. My concern is that with the increase in goat hunting, there will be an increase in novice goat hunters. This is of grave concern for the harvest of nanny and sub-adult goats. I believe an educational video, such as was done for bear and moose, should be mandatory for all goat hunts.

**PROPOSED BY:** Brian Watkins (EG-F22-008)

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## **Cordova Area Proposals – Unit 6**

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### **PROPOSAL 59**

#### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the RG231 to an archery only hunt for goat in Unit 6 for certified bowhunters as follows:

RG231 One goat by **bow and arrow only** by permit available in person in Cordova beginning Sept. 22 **by certified bowhunters.**

**What is the issue you would like the board to address and why?** RG231 in Unit 6C routinely closes down early because of high success rates and has a high rate of nanny harvest. (This information was obtained from a local wildlife biologist.) In addition, there are limited opportunities for hunters who enjoy the challenge of archery hunting mountain goats. Switching RG231 to archery only would have multiple benefits.

First, it would create a safe environment for hunters who wish to pursue archery hunting for goats without having to worry about being shot over while stalking or having goats chased off by hunters using longer range tactics.

Second, the limited harvest rate of archery would reduce the overall take of goats providing for a longer season and more hunting opportunity, but less impact on population.

Third and most important, the time and attention required to successfully harvest a mountain goat with archery equipment will make it much less likely to kill a nanny. Often, it requires many hours, even days, of close proximity observation before getting close enough to shoot a goat with a bow and this time will be invaluable in studying gender characteristics to ensure harvest of only billies.

This represents another situation where using archery hunting as conservation tool is an excellent option.

**PROPOSED BY:** Paul Forward

(EG-F22-146)

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### **PROPOSAL 60**

#### **5 AAC 85.030. Hunting seasons and bag limits for deer.**

Create an archery only deer hunt in Unit 6 for resident and nonresident certified bowhunters only as follows:

RESIDENT/NONRESIDENT HUNTERS: 5 deer total, bucks only from August 1-September 30 **by bow and arrow only, but during Nov. 1 - Nov. 15 open to certified bowhunters only**

**What is the issue you would like the board to address and why?** Unit 6 deer are relatively easy to access from major population centers and are very vulnerable during the November rut. In addition, the area is open to rifle hunting from August 1-December 31, so there are many periods of time when hunters can legally use rifles to hunt but currently no window of time when those who prefer archery hunting can hunt deer without worry of rifle hunters shooting over them while stalking deer.

The season is very long but the deer are concentrated in certain areas during much of the years making it very difficult for hunters to have a quality and safe experience if they choose to bow hunt. On Kodiak Island there is an archery season so that hunters who wish to bow hunt can have a period of time during which they can safely hunt and this is lacking in Unit 6.

Most importantly, there is an increase pressure on that deer population and overall relatively low numbers in many areas during recent years. Using an archery hunt during some of the deer’s most vulnerable time period would decrease the overall harvest while maintaining the same hunting opportunity for anyone willing to use a bow during that two week period. This would be of benefit to the population and to the hunters in the community.

**PROPOSED BY:** Paul Forward (EG-F22-148)  
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**PROPOSAL 61**

**5 AAC 85.030. Hunting seasons and bag limits for deer.**

Lower the resident and nonresident general season bag limit for deer in Unit 6 as follows:

General Season

Unit 6

Nonresidents

Bag limit: **Two** [FOUR] deer total (see details in season dates below)

Season Dates

Bucks: Aug. 1 – Sep. 30

Any deer: Oct. 1 – Dec. 31

Hunt requires harvest ticket

General Season

Unit 6

Residents Only

Bag limit: **Three** [FIVE] deer total (see details in season dates below)

Season dates:

Bucks : Aug. 1 – Sep. 30

Any deer: Oct. 1 – Dec. 31

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** Resident sport hunters for deer in Unit 6 do not need five deer and nonresidents do not need four. Deer populations in Unit 6 “seem” to not be doing as well in recent years. Between bad winters and “meat hunts” where deer are taken off the beach from a boat, the quality of the hunt is going down.

**PROPOSED BY:** Mike Harris (EG-F22-159)  
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**PROPOSAL 62**

**5 AAC 85.045(4) Hunting seasons and bag limits for moose.**

Re-establish an antlerless moose season in Unit 6C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 <b><u>moose</u></b> [BULL] by drawing permit only; up to 40 permits <b><u>for bulls and up to 20 permits for antlerless moose</u></b> may be issued; or	Sept. 1-Oct. 31 (General hunt only)	No open season.
1 <b><u>moose</u></b> [BULL] by registration permit only;	Nov. 1-Dec. 31	No open season.
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts are used to manage population growth and keep it within the limits of what the habitat can support. Antlerless moose hunting opportunity has been consistently provided in Unit 6C since 1984. The Copper River/Prince William Sound Fish and Game Advisory Committee did not meet during 2021 and was unable to reauthorize the hunt, thus it had to be removed from regulation.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2018 yielded an estimate of 677 moose, 32% of which were calves. Because the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, the state has not held an antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as intended if it is needed.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-059)  
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**PROPOSAL 63**

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

Lengthen the brown bear season in Unit 6D, excluding Montague Island as follows:

Brown/Grizzly Bear:

Resident and Nonresident

Unit 6D Remainder: One bear every four regulatory years

Oct. 1 – May 25

**What is the issue you would like the board to address and why?** Lengthen the brown bear season in Unit 6D, except Montague Island as follows: October 1 through May 25. Changing the season opening would align with the opening of doe (antlerless) deer season. General public would be able to harvest a bear legally, instead of DLP (Defense of Life or Property) or unreported take during brown bear confrontations while black-tailed deer hunting.

**PROPOSED BY:** Wayne Woods (HQ-F22-005)  
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**PROPOSAL 64**

**5 AAC 92.095(4). Unlawful methods of taking furbearers; exceptions.**

Change the minimum jaw spread for trapping land otter in Unit 6 as follows:

[5 7/8] **5 1/8**

**What is the issue you would like the board to address and why?** Inside jaw spread of 5 7/8” or greater. That is the equivalent of a number five long spring which most people cannot set with their hands. Otter season should end with the end of mink season or the inside jaw spread should be 5 1/8” or greater, or do away with jaw spread requirements.

This poses an inconvenience and safety hazard.

**PROPOSED BY:** Gary Facteau (EG-F22-016)  
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# **Kodiak Area Proposals – Unit 8**

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## **PROPOSAL 65**

### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Establish a fall, registration goat hunt for residents and nonresidents in Unit 8, that portion of the Aliulik Peninsula as follows:

Make a separate registration mountain goat hunt on the Aliulik Peninsula (DB 107/207) area, and reduce the bag limit to one goat and restrict the season dates to September 1 - November 15.

**What is the issue you would like the board to address and why?** RG480 mountain goat hunts which includes the Aliulik Peninsula (DB 107/207). The billy:nanny ratio, billy age class, and overall population are all in decline. The mountain goats along the Aliulik Peninsula are very susceptible to harvest from boat operators during the winter months when the goats move down the mountain and can be harvested from watercraft. Along with the billy:nanny ratio, billy age class, and overall population being in decline, we have also witnessed a decline in the nanny per kid ratio. The young age class of billies in the area could definitely be contributing to the low nanny to kid ratio.

**PROPOSED BY:** Lance Kronberger (EG-F22-046)

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## **PROPOSAL 66**

### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Create an archery only, resident goat hunt within the Unit 8, RG480 hunt area as follows:

I propose that ADF&G work with area biologists to create an archery only area within the RG480 hunt. Some of the more popular float plane lake destinations would be good candidates as would the Hepburn Peninsula that gets heavy pressure from boat based hunters.

**What is the issue you would like the board to address and why?** RG480 is a wonderful opportunity for Alaska residents to hunt mountain goats in a sustainable way. Unfortunately, some areas of the RG480 area get hunted very hard while others see very little traffic, and thus less of the intended population reduction. One solution for this would be to create an archery only area within RG480. Choosing a more high traffic area for the archery only area would decrease traffic, pressure and harvest in that area while increasing hunting pressure in other, currently less utilized areas, thus spreading out the overall harvest and hunting pressure.

This would also create a wonderful opportunity for Alaskans who would enjoy the challenge of more safely hunting mountain goats with archery equipment away from the pressure and hazards associated with rifle hunters being in the same area.

As with all archery only hunts, it should be reiterated that this hunt would not decrease any hunting opportunity for any Alaska resident. It would simply require that hunters who wish to use these areas do so with archery equipment.

**PROPOSED BY:** Paul Forward (EG-F22-151)

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**PROPOSAL 67**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Decrease the number of tags for the DG478 and DG479 goat hunts in Unit 8, to guarantee allocation of the weapons restricted, late season registration hunt as follows:

Decrease allocation of DG permits by 10-20 tags per hunt (or whatever reduction local game management believes would allow for five to ten RG478 and RG479 tags, respectively, per season) and guarantee an allocation of RG tags each year for the weapons restricted late season registration hunt.

**What is the issue you would like the board to address and why?** In the past, the RG478 and RG479 archery goat hunts reliably opened, but most of the last five years, they have been limited to no registration archery goat hunts during most seasons for the Kodiak road system. In the past, RG478 and RG479 were some of the only economical goat hunts for resident archery hunters in the state. Because of recent harvest success rates during the DG478 and DG479, the registration tags have not become as available, depriving hunters who prefer to hunt with archery equipment the chance to pursue goats without the risk associated with hunting the relatively small road system area while rifle hunters are also afield. (The risk of being shot over or at while stalking goats with a bow is real, not mention the more common scenario of rifle hunters spooking game at longer distances while archery hunters are stalking the same animals.)

Decreasing the number of tags awarded during DG478 and DG479 to ensure that the registration hunt can still happen would create the unique opportunity for resident hunters to pursue mountain goats in an economical way (i.e. without the need of air or water taxis or transporters) from the road system. Additionally, the limited efficacy of archery equipment would ensure that few goats would be harvested and the nature of the registration hunt would allow game managers to shut down the hunt if the desired number of goats were killed during the RG hunt.

**PROPOSED BY:** Paul Forward (EG-F22-150)  
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**PROPOSAL 68**

**5 AAC 85.025 Hunting seasons and bag limits for caribou.**

Modify the Unit 8, caribou hunting season from a general season harvest ticket to a registration hunt as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(2)		
Unit 8	Aug. 1–Jan. 31	Aug. 1–Jan. 31

1 caribou **by registration permit only**

**What is the issue you would like the board to address and why?** This proposal changes the Kodiak Island Unit 8 caribou hunt from a general season harvest ticket hunt to a registration hunt. Administering the hunt as a registration permit allows the department to utilize its discretionary permit authority to maintain harvest at sustainable levels. If passed, the department will establish an annual harvest quota and implement a 5-day reporting requirement (in person or by phone) to the ADF&G Kodiak office following the completion of the hunt. Implementation of a 5-day reporting requirement will provide the department near real time harvest information and provide the opportunity to close the hunt promptly when the harvest quota is reached. The Kodiak Island caribou herd has been consistently estimated at 300-400 animals since the late 1990s'. Caribou harvest was relatively consistent between 2000-2014 with an average annual harvest of approximately 18 animals per year. However, beginning in 2015 the interest and resulting harvest of caribou on Kodiak has increased significantly to an average annual harvest of 43 caribou per year. The widespread interest in hunting caribou on Kodiak continues to increase as documented by the increased number of hunters participating in the hunt. The average number of hunters participating in the caribou hunt annually from 2000-2013 was 34. The average number of hunters participating in the caribou hunt annually from 2014-present was 73, more than double the previous average. Modifying the caribou hunt from a general season harvest ticket to a registration hunt will aid the department in achieving and maintaining the caribou herd at a management objective of 350-500 animals.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-060)  
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**PROPOSAL 69**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Exclude Kodiak Island from the hunt area for elk in Unit 8 Remainder as follows:

Modify the definition of elk area “Unit 8 Remainder” to remove Kodiak Island and include only the areas on Afognak Island.

**What is the issue you would like the board to address and why?** Closing Kodiak Island from elk hunting may give Roosevelt elk a chance to populate the area. Roosevelt elk have successfully populated Afognak (and Raspberry) Island since 1929. Some Roosevelt elk have occasionally been able to swim to Kodiak Island, but were hunted and killed after. If the season was closed on Kodiak Island indefinitely, it would allow elk that migrate to grow into a huntable population.

A huntable population could increase revenues to the Alaska Department of Fish and Game as well as guides by attracting more hunters. Elk are some of the most highly desirable species to hunt in the United States.

Elk on Kodiak Island could increase food security for the island in two ways. First, having elk on the island simply increases physical access to food. One elk can often yield over 400 lbs. of meat, nearly the weight of a butchered moose. Secondly, it would increase the economic access to food on Kodiak, where meat is expensive to purchase. Any resident of Kodiak Island could benefit from a significant meat source, but more specifically, residents of the town of Kodiak have limited subsistence food sources on the road system. Often the subsistence users with the greatest need have few economic resources. In Kodiak, in most years, residents need expensive vehicles to get

off the road system (either ATVs or a seaworthy vessel) to gather large volumes of fish or meat. The two subsistence meat sources that can fill a freezer on the road system are the Buskin and Pasagshak rivers' sockeye run, and they often have a run too weak for subsistence fishing. Elk would likely populate near the road system due to the large amount grazing areas nearby. This would allow the subsistence users with limited economic resources to simply walk or drive a highway vehicle to start hunting a freezer filling source of food. The other villages on Kodiak could also benefit from another large food resource.

If elk were to swim to Kodiak Island, as has been reported in the past, the state would not have to expend any resources transplanting animals.

If animals from the same archipelago were to migrate, there would be no concerns of disease. It would also keep the unique and valuable genetics of Afognak elk – the nation's largest elk.

There have been reports of Rocky Mountain elk escaping from the ranch on Narrow Cape on Kodiak. It is possible that the Rocky Mountain elk could risk the genetic makeup of the Afognak Roosevelt elk with cross breeding. The risk exists today because some Roosevelt elk have been reported on Kodiak. One suggestion that can be included with this proposal is to have an open season elk hunt within a certain radius of Narrow Cape – with reporting requirements. If no elk are killed within a certain number of years, the open season could be reevaluated. Another suggestion is to have the state regulate animals that have a risk of being an invasive species or breeding with wild animals.

The US Fish and Wildlife (USFWS) has historically shown they are adverse to the introduction of new species in wildlife refuges. The USFWS could manage the elk on the Kodiak Island Wildlife Refuge as they see fit. However, a large part of Kodiak is not on the refuge and can be managed through a pro-hunting and pro-resource management style as the Board of Game and Alaska residents see best for themselves.

Elk would likely thrive on Kodiak Island, because of the extensive graze and habitat. The deer on Kodiak would have few shared resources with the elk. Elk are grazers, and feed on grasses and sedges. Deer are browsers and consume a different diet. Mountain goats also have little overlap in their diet compared to elk.

There are many advantages to elk populating Kodiak Island, including increased revenue for the state, food security, and more hunting opportunity. All with no startup costs and utilizing mostly unused grazing vegetation on the island.

**PROPOSED BY:** Chris Sibrel (EG-F22-045)  
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**PROPOSAL 70**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Modify the Unit 8, Raspberry Island hunting season and bag limit by changing the antlerless elk drawing hunt to an antlerless registration hunt as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(2)		
Unit 8, Raspberry Island  1 bull elk by drawing permit only; up to 100 permits will be issued	Oct. 1–Oct. 22 (General hunt only)	Oct. 1–Oct. 22
1 antlerless elk by <b>registration</b> [DRAWING] permit only; [UP TO 200 PERMITS WILL BE ISSUED]	Oct. 23–Nov. 30 (General hunt only)	Oct. 23–Nov. 30

...

**What is the issue you would like the board to address and why?** Additional harvest opportunities for resident and nonresident hunters is available and the department recommends changing the drawing hunt to a registration hunt to increase hunter success. Historically, only a small percentage of Raspberry Island antlerless drawing permit winners show up to hunt. On average, over the last ten years (2011-2020) only 38% of the antlerless drawing winners participated in the hunt resulting in an average of 4.9 antlerless elk harvested annually. The population objective for Raspberry Island is 150-200 elk with a bull:cow ratio of 20-25 bulls:100 cows. Historically, when the total population of elk on Raspberry Island approaches 230-250 animals, the population suffers an abrupt decline. This abrupt reduction in the population has been documented multiple times since the 1960s’ (1965, 1987, 1996, 2018) with the most recent occurring in 2018. Interestingly, the estimated number of bulls on Raspberry Island has stayed relatively consistent over time with drastic fluctuations primarily observed within the cow population. Multiple attempts have been made to decrease the cow population (by increasing the number of antlerless drawing permits) with little to no results. Providing additional opportunities to harvest antlerless elk through a registration hunt will aid the department in achieving and maintaining the management objective of 150-200 elk with a 20-25:100 bull:cow ratio.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-061)  
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**PROPOSAL 71**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Establish a drawing permit hunt for elk, open to take by bow and arrow only in Unit 8, Southwest Afognak as follows:

**Hunt Details**

Hunt Number: DEXXX

Hunt Type: Draw

Species: Elk

Legal Animal: One elk

Method: Bow and arrow only. Bowhunter certification is required.

Number of Permits: To be set by the department with up to 10 being issued.

Unit, Area: 08, Southwest Afognak Island

Season Dates: 09/14 – 09/24

Residency Restrictions:

    Hunt available to nonresidents

    Hunt available to Alaska residents

Reporting Requirements:

    Successful Hunters: Report in person or by phone to Kodiak within two days of end of hunt and permit report by mail within five days.

    Unsuccessful Hunters: Report online or by mail within 15 days of season end.

**What is the issue you would like the board to address and why?** Establishing a drawing permit hunt restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would be earlier than existing hunts in the area, which, combined with the limits of archery equipment, would add to the difficulty in harvest and limit impact on elk populations. An example of the low impact of archery equipment can be taken from existing drawing permit hunt DE318 in Unit 3. DE318 takes place from September 1- September 30 and precedes two drawing permit hunts that allow firearms in the same hunt area. According to data pulled from ADF&G, from 2009-2020, 276 permits were issued for DE318 with only 12 bulls being taken. This data shows an average of just over one bull per year being taken. We believe that adding an early season archery hunt should have little ecological effect on the elk population on Southwest Afognak. This hunt would be for the same area as current existing DE711 and DE713.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-128)

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**PROPOSAL 72**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Establish a drawing permit hunt for elk, open to take by bow and arrow only in Unit 8, Raspberry Island as follows:

**Hunt Details**

Hunt Number: DEXXX

Hunt Type: Draw

Species: Elk

Legal Animal: One elk

Method: Bow and arrow only. Bowhunter certification is required.

Number of Permits: To be set by the department with up to six being issued.

Unit, Area: 8, Raspberry Island

Season Dates: 09/15 – 09/25

**Residency Restrictions**

Hunt available to nonresidents

Hunt available to Alaska residents

**Reporting Requirements**

Successful Hunters: Report in person or by phone to Kodiak within two days of end of hunt and permit report by mail within 5 days.

Unsuccessful Hunters: Report online or by mail within 15 days of season end.

**What is the issue you would like the board to address and why?** Establishing a drawing permit hunt restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would be earlier than existing hunts in the area, which, combined with the limits of archery equipment, would add to the difficulty in harvest and limit impact on elk populations. An example of the low impact of archery equipment can be taken from existing drawing permit hunt DE318 in Unit 3. DE318 takes place from September 1 - September 30 and precedes two drawing permit hunts that allow firearms in the same hunt area. According to data pulled from ADF&G, from 2009-2020, 276 permits were issued for DE318 with only 12 bulls being taken. This data shows an average of just over one bull per year being taken. We believe that adding an early season archery hunt should have little ecological effect on the elk population on Raspberry Island. This hunt would be for the same area as current existing DE702, DE704 and DE706.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-129)

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**PROPOSAL 73**

**5 AAC 85.030. Hunting seasons and bag limits for deer.**

Reduce the bag limit for deer in Unit 8, Remainder as follows:

In the Remainder of Unit 8, reduce the bag limit to two deer per year for residents and one deer per year for nonresidents.

**What is the issue you would like the board to address and why?** Kodiak Island deer populations are very low and depressed after two consecutive hard winters in 2019-2020 and 2020-2021.

There are not enough deer for people, especially local Kodiak Island residents to get what they need for eating.

I suggest that the bag limit for Sitka black-tailed deer in Unit 8 be reduced to two deer a year for Alaska residents and one deer a year for nonresidents.

**PROPOSED BY:** Stig Yngve (EG-F22-018)

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**PROPOSAL 74**

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

Require that meat must be left on the bone when hunting deer in Unit 8 as follows:

All deer harvested in Unit 8 must remain bone-in until processed at a land-based location.

**What is the issue you would like the board to address and why?** Wanton waste of deer is the issue here, especially with boat based transporters.

**PROPOSED BY:** Stig Yngve (EG-F22-020)

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**PROPOSAL 75**

**5 AAC 92.130(f). Restrictions to bag limit.**

Count brown bear wounded by hunters in Unit 8 against the bag limit of one bear every four calendar years as follows:

If you wound a bear in Unit 8, you cannot hunt for brown bear again in Unit 8 for four regulatory years.

**What is the issue you would like the board to address and why?** I would like to address the issue of wounded bears in Unit 8. Because a calendar year of hunting is different than a regulatory management year, a person can wound a bear in a spring hunt on Kodiak Island and hunt again legally in the fall because the fish and game regulatory year ended in July. I would like to see this changed such that a wounded bear in Unit 8 counts against your tag, just like a harvested bear. It is an issue of hunting morality that needs to be addressed.

If you wound a bear you are done hunting for Kodiak brown bear for four calendar years.

**PROPOSED BY:** Stig Yngve (EG-F22-017)

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**PROPOSAL 76**

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

Lengthen the brown bear registration hunt seasons for RB230 and RB260 in Unit 8 as follows:

Currently, fall Kodiak brown bear registration permit RB230 is October 25 - November 30. Change dates to October 25 - **December 31**.

Spring brown bear registration permit RB260 is April 1 - May 15. Change dates to **March 1** - May 15. This recommendation is to extend the hunting season in proximity to the town of Kodiak and livestock ranches in Pasagshak for public safety.

**What is the issue you would like the board to address and why?** Brown bear mortality from Defense of Life or Property activity is increasing in areas surrounding Kodiak and the livestock ranches with the road system area. There is general community concern for public safety and increased destruction of private property. Early in the spring and late in the fall appear to have more disruptive bear behavior. This may be due to lack of plentiful food sources during this time of year. Once a bear finds a garbage or livestock food source, they rarely leave it. Kodiak has ongoing issues with both.

**PROPOSED BY:** Jason Bunch (EG-F22-031)

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**PROPOSAL 77**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

Eliminate brown bear permits the following season, when a female bear is taken in Unit 8 as follows:

In Unit 8, if a resident or nonresident hunter kills a female brown bear in Kodiak bear management Units 8-16, the department will eliminate a permit from the management unit in which the harvest occurred during the next regulatory year. Permits will be eliminated from the corresponding nonresident or resident allocation, during the spring or fall season respectively.

**What is the issue you would like the board to address and why?** In 1994, the board responded to department concerns of a declining brown bear population in the southwest portion of Kodiak Island by passing a regulation that restricted the take of female brown bears. If a guided nonresident hunter killed a female brown bear with a skull that was not at least 9 inches wide or 15 inches long, the department eliminated a nonresident permit from that area during the next season. This regulation was in effect RY94-RY06.

The department has again expressed concerns about a decline in the brown bear population in the southwest portion of Kodiak Island (Kodiak bear management Units 8-16). This regulatory change is intended to reduce the overall harvest of female brown bears by both resident and nonresident hunters which may prevent further declines and allow for a more rapid recovery of the population.

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**PROPOSAL 78**

**92.061 Special provisions for brown bear drawing permit hunts.**

Require all hunters to apply for Unit 8 brown bear drawing permits as follows:

Amend language in 5AAC 92.061 to close any existing loopholes, to absolutely require that all nonresidents or their guides **must** file a draw permit application and pay the fee during the application period in order to have an opportunity to hunt. An alternate list for cancellations may be implemented, but if there was no application and application fee received during the application period, you are not eligible to hunt that permit. There will be no over-the-counter tags awarded outside the draw permit process.

**What is the issue you would like the board to address and why?**

**Guides and their nonresident clients being allowed to intentionally “skip” the Kodiak brown bear draw permit process.**

Resident hunters must go through a “lottery” draw permit selection process with very low odds in order to have the opportunity to hunt brown bears on most of Kodiak Island. Residents must apply for a Kodiak brown bear draw permit during the Nov. 1 – Dec. 15 draw permit application period and pay an application fee for a chance to hunt, and many residents put in for decades without ever drawing a permit.

Nonresident guided hunters are allocated up to 40 percent of all Kodiak brown bear draw permits, but unlike residents they (or their guide) do not have to submit a draw permit application during the Nov. 1 – Dec. 15 application period or pay an application fee. They simply contact the guide with an exclusive guide concession within Kodiak National Wildlife Refuge, which encompasses most of the island, agree to a fee, sign a contract, then pick up an over-the-counter permit when they arrive on Kodiak.

Here are some examples of what is happening:

***“EXCLUSIVE! NO DRAWING KODIAK BROWN BEAR HUNT – GIANTS OF KODIAK ISLAND, ALASKA. SKIP THE PERMIT DRAWING PROCESS AND HUNT THE WORLD’S LARGEST BROWN BEARS!***

*We have a few openings for the ultimate bear hunt – Kodiak Island brown bears – and if you book with this outfitter, you can bypass the permit drawing process and start planning your trip now.”*

- Above is an advertisement from a well-known hunt booking agent in the Lower 48 (we have left out the name of the agent but are happy to provide copies of his March 2020 advertisement)

***“12-day spring Kodiak Island brown bear for 1 hunter. License and tag fees not included. DATES: This hunt must be scheduled for spring April 22 - May 4th, 2022. This includes travel days to and from camp. This hunt cannot be delayed.”***

- Above is a donated Kodiak brown bear hunt from a guide with concession on Kodiak National Wildlife Refuge for a hunt that was supposed be applied for during the previous year application period. Hunt was auctioned off in January 2022.

What is happening is also clearly evident by looking at the draw permit supplement results over the years for the DB 100 series of nonresident draw permits. Going down the list of the 2021 results there are many instances of zero applications received and zero permits awarded. Yet most all of those hunts were actually conducted by guides and their clients who chose to skip the draw permit process entirely. Other DB 100 series hunts list fewer applications than the total number of draw permits available, and most all of those hunts were conducted as well without going through the draw permit process.

For the 2021 DB 100 series of nonresident guided-only draw hunts, DB 107, 114, 116, 117, 122, 123, 137, 124, 125, 141, and 144 had zero applications. DB 105, 110, 113, 137, 140, 145, 149, 150, and 152 had fewer applications than the number of permits available.

In speaking with department staff, we were informed that this is not how the permit process is supposed to work and that guides who choose to skip the permit application process create headaches when they show up at a crowded time at the office expecting to pick up an over-the-counter permit for their client who did not go through the draw permit application process.

We submitted a similar proposal (#151) at the 2022 Statewide Board of Game (BOG) meeting that included other nonresident guided-only draw permit hunts on USFWS Refuge lands. Proposal 151 was widely opposed by guides and the guide industry, with guides saying that these permits do **not** go to the guides, while at the same time saying that they “take permits off the table” for their concession area for various reasons. How can a guide take a permit “off the table” if in reality the permit doesn’t actually go to the guide? This is semantics and **the truth is that guides on USFWS lands with exclusive concessions control the draw permits that are allocated to their specific concession area.** They can and do choose to use them or not use them as they see fit.

Guides also stated in opposition to Proposal 151 at the 2022 Statewide BOG meeting that if it was required for them or their client to turn in a draw permit application during the application period (as required!) it would somehow infringe on consumer protections to their clients, because any cancellations would then not allow them to choose an “alternate” client. But that is the reason for the “alternate list” described in the regulation that is not being followed.

Also at the 2022 Statewide BOG meeting, the department stated that Proposal 151 should be a regional proposal, so it could be considered specific to the regions it encompassed. Hence this proposal now before the board specific to Region II Unit 8.

#### **5AAC 92.061 Special provisions for Unit 8 brown bear permit hunts, reads:**

“In the Unit 8 general brown bear drawing permit hunt, the department shall issue permits, and a hunter may apply for a permit, as follows:

- (1) the department shall issue a maximum of 40 percent of the drawing permits to nonresidents and a minimum of 60 percent to residents; each guide may submit the same number of nonresident applications for a hunt as the number of permits available for that hunt;

(3) the department **shall** enter, in a guided nonresident drawing, each complete application from a nonresident who will be accompanied by a guide; the department may enter an application and issue a drawing permit for the general hunt only to a successful nonresident applicant who presents proof at the time of application that the applicant will be accompanied by a guide, as required in [AS 16.05.407](#) (a);

(4) the following provisions apply to a guided nonresident drawing under this section:

(A) an applicant for a guided nonresident drawing permit may apply for only one such permit per application period;

(B) **after the successful applicants have been selected by drawing**, the department shall create an alternate list by drawing the remaining names of applicants for a specific hunt and placing the names on the alternate list in the order in which the names were drawn;

(C) if a successful applicant cancels the guided hunt, the person whose name appears first on the alternate list for that hunt shall be offered the permit; if an alternate applicant fails to furnish proof that the applicant will be accompanied by a guide, the permit must be offered in turn to succeeding alternate applicants until the alternate list is exhausted;

(D) **if a guided nonresident drawing permit is available, but the alternate list is exhausted**, the permit becomes available, by registration at the Kodiak ADF&G office, to the first applicant furnishing proof that the applicant will be accompanied by a guide;” [our emphasis]

What is going on has nothing to do with any “alternate list.” Draw permit applications are purposely not being submitted during the application period, even though the regulation states that the department “shall” enter each complete draw permit application from a nonresident who will be accompanied by a guide. The only way there can be an alternate list according to the regulation is “after the successful applicants have been selected by drawing.”

This loophole that allows guides and their nonresident clients to skip the draw permit process and have a 100 percent opportunity to hunt needs to be fixed. The abuse of the current regulation was never intended but is now widespread to the point it has become a norm for many guides and their clients. To mandate that resident hunters go through a draw permit lottery process in order to have a chance for the opportunity to hunt one of the most iconic brown bear populations in the world, yet allow nonresident hunters with enough money to bypass such a lottery process and have a 100 percent opportunity to hunt is clearly not constitutional.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F22-022)

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**PROPOSAL 79**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

Transfer under-subscribed nonresident brown bear permits for Unit 8 to the resident allocation as follows:

Any hunt area DB101-DB193 tag not applied for by a nonresident, that tag will be placed into an alternate pool list and awarded to a resident hunter, or the tag will be placed into the corresponding DB201-293 resident application pool the following regulatory year.

**What is the issue you would like the board to address and why?** Hunt area DB101-DB193 nonresident tags are not always hunted. If they do not, then the opportunity should be given to a resident hunter.

**PROPOSED BY:** Christopher Wallstrum (EG-F22-036)  
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**PROPOSAL 80**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

Adjust the allocation for Unit 8 brown bear permit hunts, DB101 - DB193, as follows:

Any Kodiak hunt draw permit area DB101 - DB193 cannot be allocated over the current average .35% of the tags in an individual hunt.

**What is the issue you would like the board to address and why?** The tag allocation in hunt areas DB101-DB193 is not close to equal amongst each area. The distribution is between 20%-44%. Why the disparity? The allocation of some areas need to go up and others need to go down to get them closer to equal to distribute the resident and nonresident tag allocation more equal.

**PROPOSED BY:** Christopher Wallstrum (EG-F22-037)  
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**PROPOSAL 81**

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

Require all snares set on the Kodiak road system to include breakaway mechanisms as follows:

On the Kodiak road system, all snares must be equipped with a breakaway mechanism (of a designated minimum poundage) on the loop end of the snare and the snare cable and anchor must be stronger than the breakaway mechanism.

This change was proposed last cycle by the Kodiak Fish and Game Advisory Committee (Southcentral Region meeting: March 14–19, 2019; Proposal 109). Proposal 109 found broad community support, but ultimately failed on a split 3-3 vote by the board. Since that time, the number of incidents and volume of community discussion related to this issue has only increased. The inclusion of appropriately sized breakaway mechanisms would allow trappers to continue targeting furbearers with snares along the Kodiak road system while reducing catch of non-target

animals, promoting responsible trapping practices, and reducing user group conflict. Inclusion of breakaway mechanisms is not expected to significantly increase direct costs for an individual to participate in trapping activities.

The Humane Society of Kodiak is not a member of, nor formally affiliated with, the Humane Society of the United States or the American Humane Society.

**What is the issue you would like the board to address and why?** There has been an increase in catch of non-target animals in snares set along the Kodiak road system, including bears, deer, and domestic animals. The main concern is with locking style snares that do not incorporate breakaway mechanisms. Snares without breakaway mechanisms cause severe injury or death to non-target animals, resulting in increased mortality of valuable game resources (i.e., bears and deer) and conflicts between trappers and other user groups, particularly when domestic animals (i.e., dogs and livestock) are involved.

**PROPOSED BY:** Humane Society of Kodiak Board of Directors (EG-F22-131)  
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# **Anchorage Area Proposals – Unit 14C**

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## **PROPOSAL 82**

### **5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Expand the Unit 14C northeast sheep drawing hunt areas to include the East Fork Eklutna hunt area as follows:

Add East Fork Eklutna area, former hunt numbers DS127, DS128 and DS129 to the Unit 14C northeast unit hunt numbers DS124, DS125 DS126 and DS224.

**What is the issue you would like the board to address and why?** The East Fork Eklutna area, hunt numbers DS127, DS128 and DS129 has been closed to rifle sheep hunting since a least 2012. The only open season is for the late areawide bow season DS140 and DS240. There was a massive die off in the winter of 1998-1999 and the sheep population continued to decline until there was no full curls in the unit and it was closed in 2011 or 2012. In the last four years there has been a number of rams that have been in the unit with three or four being mature full curls but rifle hunters had no open season to hunt them. It hasn't been consistent enough in my opinion to issue permits just in the East Fork Eklutna. I would like to see the East Fork Eklutna area added to the adjoining area in Unit14C northeast unit hunt numbers DS124, DS125, DS126 and DS224 without increasing the permits in the area unless the department thinks there is enough rams to do so. This would allow hunters more opportunity and more area to hunt and better access without putting more pressure on the resource.

**PROPOSED BY:** Dan Montgomery (EG-F22-070)

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## **PROPOSAL 83**

### **5 AAC 85. 055. Hunting seasons and bag limits for Dall sheep.**

Reopen the late rifle hunt for sheep in Unit 14C and redistribute the existing permits to not increase the total take of rams as follows:

Reopen the late areawide rifle season DS139 but don't increase the total number of permits issued by taking some permits from DS132-one permit, DS137- one permit, DS138 - two permits and eliminating DS232.

The new hunt structure would be as follows:

DS132 - 5 resident permits

DS137 - 7 resident permits

DS138 - 6 resident permits

DS139 - 4 resident permits

DS239 - 1 nonresident permit

DS232 - Eliminated for now but could be issued again if the sheep population in the area increases and the permits for all hunters are increased for this area.

**What is the issue you would like the board to address and why?** I would like to see the areawide late rifle season DS139 reopened. DS139 did not include the hunt areas of DS123 and it would not include them now. The season dates were Sept. 18 to Sept. 30. This hunt was discontinued in 2012 because of a sharp decline in the sheep population and the department was issuing 20 permits and there was too much pressure on the rams. The population has stabilized now but there can be a lack of legal full curl rams in the late hunts in the Ship Creek unit hunts DS138 - eight resident permits and DS238 - one nonresident permit and the Peters Creek unit hunts DS132 - six resident hunters and DS232 - one nonresident hunter. At the same time we have observed a surplus of 10 year-old plus rams in the Upper Eagle River unit and the northeast - Hunter Creek unit lately. It would be beneficial to all hunters to have a very limited increased access to these other areas and the rams in them. By closing DS139 in 2012, it also prevented the governor's permit holder from hunting this time period. My proposal would be to open DS139 again but not to increase the number of permits issued overall but to take some of the later season permits from DS137 - one resident permit, DS138 - two resident permits, DS132 - one resident permit and DS232 - one nonresident permit and take these five permits, four resident and one nonresident and place the four resident permits in DS139 and the one nonresident permit in DS239. I would also recommend never increasing the number of permits for these two hunts. These permit holders would still be able to hunt the original areas if they wanted to but also the three additional areas. Weather can be very harsh this time of year and I think there will be a very low success rate for this hunt. There is a 13.5% nonresident permit allocation for Unit 14C and this change would keep the permit allocation in compliance with that.

**PROPOSED BY:** Dan Montgomery (EG-F22-071)  
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**PROPOSAL 84**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create a new archery only, drawing hunt for sheep in Unit 14C, that portion within the Eklutna River drainage area as follows:

I propose to create another tag that runs Aug. 5 - 12 to allow better opportunity as well as experience for bowhunters. This would cover the same areas as DS141. If permitted, ADF&G biologists can decide tag allotment between this new tag and DS141. I would be open to taking tags from DS141 and moving to this new tag. Currently, DS141 has 24 tags allotted. Splitting to 12 and 12 or whatever the board decides, would be beneficial.

Bow only draw tag for sheep hunt area: that portion of Unit 14C within the Eklutna River drainage upstream of the Eklutna River closed area excluding the East Fork Eklutna River.

Bowhunters: must be IBEP (International Bowhunters Education Program) certified prior to hunting in DSXXX. Call ADF&G for more information.

Hunt Area: that portion of Unit 14C within the Eklutna River drainage upstream of the Eklutna River closed area excluding the East Fork Eklutna River.

Season Dates Aug. 5 - 12.

Tag Allotment: Per ADF&G and/or Board of Game referral as stated above.

**What is the issue you would like the board to address and why?** I have hunted DS141 (archery only Sept. 1 – Sept. 30) multiple times. Although the tag appears to cover a substantial area, the sheep are concentrated to small areas within the unit. I have experienced hunters hunting directly on top of each other. It takes away from the experience of the hunt and puts higher stress on the sheep population. There is also a rifle hunt adjacent to DS141 (DS 124) that runs August 10 - 22. Hunters often access this area via the DS141 tag area and push the sheep up and out of DS141, into DS124.

**PROPOSED BY:** Brian Watkins (EG-F22-007)  
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**PROPOSAL 85**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Create an archery only drawing hunt for goat in Unit 14C, within the drainage of the West Fork of Eklutna River as follows:

Bow only draw tag for goats:

Hunt Area: Unit 14C, West Eklutna, within the drainage of the West Fork of the Eklutna River.

Bowhunters: must be IBEP (International Bowhunters Education Program) certified prior to hunting in DGXXX. Call ADF&G for more information.

Season Dates Sept. 1-Oct. 15.

Taking of a nanny accompanied by a kid is prohibited.

HUNTERS SHOULD TRY TO TAKE MALE GOATS

**What is the issue you would like the board to address and why?** In my time spent in the West Fork of the Eklutna River, I have observed a population of goats within the West Fork of the Eklutna River. This area is adjacent to DG852, so ADF&G biologists would have to advise on tag allotment. There are not many goat only bow opportunities in Alaska that I am aware of. I would like a bow only tag in this area.

**PROPOSED BY:** Brian Watkins (EG-F22-010)  
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**PROPOSAL 86**

**5 AAC 85.045(5). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C as follows:

	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<b>Seasons and Bag Limits</b>		

(5)

...

Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage

RESIDENT HUNTERS:

1 moose by drawing permit only; up to 60 permits for bulls will be issued in combination with nonresident hunts, and up to 70 permits for antlerless moose will be issued; or

Aug. 20—Oct. 10  
(General hunt only)

...

**What is the issue you would like the board to address and why?** Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorizing the antlerless hunt in Units 7 and 14C. The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters and sharp reductions during severe winters. In 2009, antlerless permits were issued for the first time since 2004. The number of permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A December 2021 aerial composition count of moose in the Twentymile, Portage, and Placer River drainages found 185 moose with a bull:cow ratio of 36 bulls per 100 cows and a calf:cow ratio of 19 calves per 100 cows. This is an increase when compared to the December 2020 count, which found 153 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 14 calves per 100 cows, and the December 2016 count which found 153 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 18 calves per 100 cows.

The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. The moose population will be healthier and more productive due to decreased stress levels associated with winter food shortages. This hunt has been successful in creating additional moose hunting opportunity with little or no controversy.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-055)

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**PROPOSAL 87**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a general moose season open for take by bow and arrow only, in Unit 14C Remainder as follows:

Unit 14C Remainder

Residents and nonresidents

**One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side, by bow and arrow only Aug. 22-Aug. 29**

**OR**

One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side Sept. 1 - Sept. 30.

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would precede the current general season which, combined with the already existing antler restrictions and limits of archery equipment, would add to the difficulty in harvest and limit impact on moose populations. This hunt would mirror almost exactly the existing bow and arrow only seasons in Units 15A Remainder and 15B Remainder.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-121)

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**PROPOSAL 88**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Change the registration moose hunt, RM445, in the Chugach State Park Management Area in Unit 14C to an archery only hunt as follows:

*Chugach State Park Management Area (excluding Ship Creek drainage):*

**One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by bow and arrow only by certified bowhunters.**

*September 1 - 30*

**What is the issue you would like the board to address and why?** The Chugach State Park Management area is currently open to moose hunting from September 1 - 30 for one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines on at least one side. Much of this area is prohibitively remote for ethical moose hunting but the areas that are accessible are close to very popular multi use trails and pathways. This creates potential for hunter/non-hunter conflict and the potential for accidents when using long range centerfire rifles around populated areas and heavily used trails.

In addition, there are currently limited opportunities for local hunters who wish to pursue moose with bow and arrow, the exception being RM445 where many years of archery hunting close to a heavily used trail has set a positive precedent. Unfortunately, RM445 is very heavily hunted because so many local hunters enjoy the challenge of archery hunting for moose.

One solution to these issues would be to transition the Chugach State Park Management area, or at least a large portion of it, to archery only for moose hunting. This would likely be a popular hunt given the proximity to Anchorage and the increasing popularity of archery hunting for moose but given the limited range of archery equipment would also not increase the overall harvest of moose in the area.

As with all archery only hunts, it should be reiterated that this hunt would not decrease any hunting opportunity for any Alaska resident or nonresident. It would simply require that hunters who wish to use these areas do so with archery equipment.

**PROPOSED BY:** Paul Forward (EG-F22-152)  
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**PROPOSAL 89**

**5 AAC 85.045(5). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 14C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		

Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
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1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued

Unit 14(C), that portion of the Ship Creek drainage upstream of the Joint Base Elmendorf-Richardson (JBER) Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
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...

Remainder of Unit 14(C)

1 moose per regulatory year, only as follows:

...

1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
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...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually, and the department recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population level, which has been demonstrated to reduce over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and starvation during severe winters. These hunts have also been successful in providing additional moose hunting opportunities in the state’s human population center with little controversy.

The number of antlerless permits issued depends on the current population level and bull:cow ratios, as well as estimated winter mortality. A combined 2021 aerial composition count of the Joint Base Elmendorf Richardson Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14C found 301 moose with a bull:cow ratio of 44 bulls per 100 cows and a calf:cow ratio of 20 calves per 100 cows. In 2020, a survey of the same area found a total of 242 moose with bull:cow and calf:cow ratios of 30:100 and 25:100, respectively. Compared to the 2013 survey, which found 225 moose with a bull:cow ratio of 39 bulls per 100 cows and a calf:cow ratio of 20 calves per 100 cows, little change has occurred. In addition, harvest numbers have remained relatively steady, indicating that the population level has likely not changed dramatically. At this population level, there are few reports of human-moose conflicts and of winter mortalities. Harvesting cow moose is paramount to maintaining the population at the low end of the objective while providing harvest opportunity.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-054)  
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**PROPOSAL 90**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Establish a primitive weapons hunt or any weapons hunt for black bear in the West Fork of Eagle River Drainage in Unit 14C as follows:

Hunt Area: Unit 14C, South Fork Eagle River: all drainages into South Fork Eagle River, excluding that area within ½ mile of a developed facility. Black bear.

**What is the issue you would like the board to address and why?** The West Fork of Eagle River drainage is known for having a substantial population of bears. There have been several known bear attacks. The latest in June 2018. I have a view of the north facing side of Highland Mountain and consistently see brown and black bears on that mountain in the fall. It's important we hunt bears in this area to maintain their fear of human encounters. I would like the Board of Game (BOG) to either implement a primitive weapons hunt or an any weapons hunt in this area. Season dates and tag allotment to be determined by ADF&G biologists. Recommended by submitter to be the same dates as DL457 (Oct. 1-31) to alleviate hunter/hiker encounters. I am intentionally separating black and brown bears for this submission for deliberation within BOG and tag allotment by ADF&G biologists.

**PROPOSED BY:** Brian Watkins (EG-F22-011)  
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**PROPOSAL 91**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Add bow and arrow to the legal means of take for the DL455 black bear hunt in Unit 14C, Joint Base Elmendorf-Richardson as follows:

DL455

Unit 14C, portions of Joint Base Elmendorf-Richardson Management Area (former Fort Richardson portion)

One bear by shotgun **or bow and arrow** only by permit Sept. 1-June 15

**What is the issue you would like the board to address and why?** Drawing permit hunt DL455 already allows the take of one black bear by shotgun only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. There are currently multiple archery hunts that already take place on the Joint Base Elmendorf-Richardson (JBER) and there is no reason DL455 should exclude archery equipment. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun or a bow rather than only being limited to using a shotgun.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-125)  
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**PROPOSAL 92**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Add bow and arrow to the legal means of take for the DL457 black bear hunt in Unit 14C, McHugh Creek area as follows:

DL457

Unit 14C, McHugh Creek

One bear by **bow and arrow**, shotgun or muzzleloader only by permit Oct. 1-Oct. 31

**What is the issue you would like the board to address and why?** Drawing permit hunt DL457 already allows the take of one black bear by shotgun or muzzleloader only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun, muzzleloader, or a bow rather than only being limited to using a shotgun or muzzleloader.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-127)  
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**PROPOSAL 93**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Allow certified bowhunters to participate in DL455 and DL457 black bear hunts in Unit 14C, Joint Base Elmendorf-Richardson and McHugh Creek areas as follows:

Add certified bowhunters to applicants for drawing hunts DL455 and DL457.

“...(3) Unit 14(C), JBER Management Area 1 bear every regulatory year, by drawing permit Sept. 1 – June 15 Sept. 15 - June 15 only; by shotgun **and archery** only; (General hunt only) up to 25

permits may be issued Unit 14(C), that portion Sept. 1 - May. 31 known as the Anchorage (General hunt only) Management Area 1 bear by drawing permit only. shotgun, archery, or muzzleloader only; weekdays only; up to 20 permits may be issued in the McHugh Creek area and up to 20 permits may be issued in the Upper Campbell Creek area...”

The option to also hunt with a shotgun or shotgun/muzzleloader would remain unchanged, allowing for follow up shots (if needed). This solution presents arguably less wounding loss potential than archery-only hunts (e.g., DM424).

**What is the issue you would like the board to address and why?** Low participation and hunter success in Unit 14C black bear drawing hunts. The current regulations limit hunters to shotgun and shotgun/muzzleloader only in DL455/457, respectively. This deters a large pool of certified black bear archery hunters from applying to hunt this underutilized resource in an area that already has a successful archery hunt for moose.

**PROPOSED BY:** Bryce Eckroth (EG-F22-114)  
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**PROPOSAL 94**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**  
**5 AAC 92.530. Management areas.**

Open a black bear archery drawing hunt in the McHugh Creek hunt area in the Unit 14C, Anchorage Management Area as follows:

Open a black bear drawing archery hunt in the existing area within the DL457 McHugh Creek hunt area. Weekday hunt only with season dates from September 1 through May 31.

**What is the issue you would like the board to address and why?** Provide more hunting opportunities for archery black bear hunts in Unit 14C.

**PROPOSED BY:** Matt Moore (EG-F22-138)  
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**PROPOSAL 95**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**  
**5 AAC 92.530. Management areas.**

Open a resident only, limited registration black bear archery hunt in McHugh Creek hunt area in the Unit 14C Anchorage Management Area as follows:

Open a resident only, limited participation, black bear registration archery hunt in the existing area within the DL457 McHugh Creek hunt area. Weekday hunt only with season dates from September 1 through May 31.

**What is the issue you would like the board to address and why?** Provide additional black bear hunting opportunities of resident archers in Unit 14C.

**PROPOSED BY:** Matt Moore (EG-F22-137)  
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**PROPOSAL 96**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Establish a black bear archery hunt in Unit 14C, the Joint Base Elmendorf-Richardson management area for hunters who also draw an archery moose tag as follows:

Add a black bear archery registration hunt for residents and nonresidents in the Joint Base Elmendorf-Richardson management hunt area. These registration permits would be made available only to those hunters who draw a moose tag and hunt by bow and arrow. The permits and hunt period would remain valid while the moose draw tag is valid.

**What is the issue you would like the board to address and why?** Provide more black bear archery hunting opportunities in Unit 14C. This is specifically for archers who have drawn a moose tag and could take a black bear while in the field if the opportunity presented itself. It is another way/opportunity to reduce the black bear predation on moose calves in Unit 14C.

**PROPOSED BY:** Matthew Moore (EG-F22-140)

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**PROPOSAL 97**

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

**5 AAC 92.530. Management areas.**

Establish a primitive weapons hunt or any weapons hunt for brown bear in the West Fork of Eagle River Drainage in Unit 14C as follows:

Hunt Area: Unit 14C, South Fork Eagle River: all drainages into South Fork Eagle River, excluding that area within ½ mile of a developed facility. Brown bear.

**What is the issue you would like the board to address and why?** The West Fork of Eagle River drainage is known for having a substantial population of bears. There have been several known bear attacks. The latest in June 2018. I have a view of the north facing side of Highland Mountain and consistently see brown and black bears on that mountain in the fall. It’s important we hunt bears in this area to maintain their fear of human encounters. With the increase in hiking post-pandemic, there is an increased likelihood of hiker/bear encounters. I would like the Board of Game (BOG) to either implement a primitive weapons hunt or an any weapons hunt in this area. Season dates and tag allotment to be determined by ADF&G Biologists. Recommended by submitter to be the same dates as DL457 (Oct. 1 - 31) to alleviate hunter/hiker encounters. I am intentionally separating black and brown bears for this submission for deliberation within BOG and tag allotment by ADF&G biologists.

**PROPOSED BY:** Brian Watkins (EG-F22-012)

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**PROPOSAL 98**

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

**5 AAC 92.530. Management areas.**

Open a hunt for brown bear within the Rainbow Creek drainage in Unit 14C as follows:

Hunt Area: Unit 14C, Rainbow creek: all drainages into Rainbow, excluding that area within a ½ mile of the Seward Highway or within ½ mile of a developed facility. Brown bear.

**What is the issue you would like the board to address and why?** In the last cycle of the Board of Game (BOG) meetings for Unit 14C, the BOG deliberated on Rainbow Creek drainage. The way it was written was for black bears, but biologists said it is not an area where black bears frequent. They said the area is frequented by brown bears. After discussion, this was rejected instead of amended by the BOG, so I am submitting with brown bears. With the increase in hiking post-pandemic, there is a likelihood of hiker/bear encounters. To get ahead of the issue, there should be a draw tag within the Rainbow Creek drainage. Season dates and tag allotment to be determined by ADF&G biologists. If primitive weapons will help to get the tag accepted, submitter agrees to that.

**PROPOSED BY:** Brian Watkins (EG-F22-013)

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**PROPOSAL 99**

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

**5 AAC 92.530. Management areas.**

Open an archery drawing hunt for brown bear in Unit 14C, the McHugh Creek area for residents and nonresidents as follows:

Open a drawing hunt for archery brown bear in same hunt area as DL457 hunt. Proposal is written for a weekday hunt only with season dates from September 1 through May 31.

**What is the issue you would like the board to address and why?** Provide additional brown bear hunting opportunity in Unit 14C.

**PROPOSED BY:** Matt Moore (EG-F22-139)

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**PROPOSAL 100**

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

**5 AAC 92.530. Management areas.**

Establish an archery only drawing hunt for brown bear in Unit 14C, Joint Base Elmendorf-Richardson area, with a bag limit of one bear every four regulatory years as follows:

Provide an archery only drawing hunt for both residents and nonresidents. One bear every four regulatory years by bow and arrow only. Season to be open from September 1st through May 31st.

**What is the issue you would like the board to address and why?** Create an archery brown bear hunting opportunity on Joint Base Elmendorf-Richardson management area.

**PROPOSED BY:** Matt Moore (EG-F22-141)  
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**PROPOSAL 101**

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

Extend the general season for brown bear, open for take by bow and arrow only, in Unit 14C Remainder as follows:

Unit 14C, Remainder

Residents and Nonresidents

One bear every regulatory year, Sept. 1 – May 31

**OR**

**One (1) brown bear, every regulatory year, by bow and arrow only June 1-June 30**

**What is the issue you would like the board to address and why?** Adding additional hunting days that are restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. Members of our organization have reported seeing a rise in brown bear activity in remote areas of Unit 14C Remainder while pursuing black bears. These members report often seeing more brown bears than black bears in this area and would like additional time to pursue them during the spring season. We believe that this extension can be accomplished without having a big impact on brown bear populations if it is restricted to the use of archery equipment only. Unit 14C Remainder is already remote, and hunters willing to access these areas are not numerous. The limited access as well as the limits of archery equipment would add to the difficulty in harvest, limiting impact on brown bear populations while also providing more opportunity for hunters to pursue bears.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-124)  
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**PROPOSAL 102**

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

Lengthen the season for brown bear in Unit 14C Remainder as follows:

Unit 14C, Remainder

Residents and Nonresidents

One bear every regulatory year **Sept 1 - June 15** [Sept 1 - May 31]

**What is the issue you would like the board to address and why?** Unit 14C Remainder is remote and at times, snow conditions don't allow access until later in the spring season. There appears to be a VERY healthy population of brown bears in this area and an additional two weeks of season does not seem to be a big ask. While hunting black bears in early June but seeing mostly brown bears, it would be nice to be able to attempt to take one.

**PROPOSED BY:** Landon Albertson (EG-F22-157)  
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**PROPOSAL 103**

- 5 AAC 85.015. Hunting seasons and bag limits for black bear.**
- 5 AAC 85.020. Hunting seasons and bag limits for brown bear.**
- 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**
- 5 AAC 92.530. Management areas.**

Establish a bear bait hunt in Unit 14C, the McHugh Creek drainage area for black and brown bear as follows:

(1) Station for bear baiting for brown and black bears in Unit 14C McHugh Creek Drainage area starting May 1 through June 15. Up to six certified users of the bait station shall operate the bait station by registration permit.

**What is the issue you would like the board to address and why?** Create a bear bait hunt within the Chugach State Park for brown and black bears. The area proposed is around the McHugh Creek area. Exact location of the bait station will be approved by ADF&G to help eliminate dangerous encounters with bears and recreational users of the park. The purpose of the proposal is to help reduce the overall number of bears on the hillside through conservation. After speaking with ADF&G biologists, a large number of bear are present in this area. Over the years there has been encounters with bears that have taken the lives of people using the park for recreational purposes. After a recent encounter ADF&G had to kill several bears when a 14-year-old boy was stalked and eaten by a bear. By using a bait station for hunting bears, the chances of wounding a bear is greatly reduced because the bears are lured in to close range and are usually moving slow or standing still for the hunter to take the shot. The location of the bait station will lure the bears away from heavily used trails and help prevent these dangerous encounters. If this proposal does not pass more dangerous encounters and possible deaths may occur. The bear population will increase and put more pressure on ADF&G staff to control population growth.

**PROPOSED BY:** Phillip Calhoun (EG-F22-135)  
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**PROPOSAL 104**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.060. Hunting seasons and bag limits for fur animals.**

Close Chugach State Park and Glacier Creek drainage in Unit 14C to lynx hunting and trapping as follows:

I am recommending the closure of all of Chugach State Park plus the Glacier Creek drainage be closed to hunting and trapping of lynx. The regulatory language I propose is as follows:

5 AAC 85.060(4) Lynx Units 6, 7, 11, 13 - 16 (General hunt only) Nov. 10 - Feb. 28 except that all of Chugach State Park and the Glacier Valley drainage are closed.

5 AAC 84. 270(5) Lynx Units 7, 11, and 13 - 16 Nov. 10 - Last day of Feb. No limit: season may be closed by emergency order; except that all of Chugach State Park and the Glacier Creek drainage are closed.

**What is the issue you would like the board to address and why?** Thousands of Alaskans who live in and around Anchorage currently have the rare opportunity to see lynx in the wild in the Anchorage bowl and Eagle River drainage, including at the Eagle River Nature Center. Videos of these cats often appear in social media, and on commercial tv. These cats are truly a premier species of watchable wildlife. These rare opportunities exist primarily because the Anchorage bowl, Joint Base Elmendorf-Richardson (JBER), the Eagle River drainage, and large parts of the Eklutna drainage are currently closed to the hunting and trapping of lynx. and because most of the rest of Unit 14C is closed to lynx hunting and trapping by emergency order in those years when population numbers are low. But much of Unit 14C is open to the hunting and trapping of lynx, and was not closed by emergency order in 2021 - 2022. The areas permanently closed to hunting and trapping lynx should be expanded to include all of Chugach State Park and also the Glacier Creek drainage. (Most of the Glacier Creek drainage is outside Chugach State Park.) The purpose would be to increase the opportunity for residents and visitors to see these cats in the wild, and to provide a larger refuge. The value of these watchable wildlife to the thousands of people who are thrilled by the occasional glimpse exceeds the value of these cats to a handful of hunters and trappers. These animals are a publicly owned resource owned by all Alaskans, and their highest and best use is as watchable wildlife

**PROPOSED BY:** Kneeland Taylor

(EG-F22-033)

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# **Kenai Peninsula Area - Units 7 & 15**

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## **PROPOSAL 105**

### **5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Limit hunters to one big game registration permit at a time in Units 7 and 15 as follows:

Add Units 7 and 15 to the areas in regulation that hunters are limited to one big game registration permit at a time.

5 AAC 92.052 (19) a person may be limited to one big game registration permit at a time in Units 1, **7 and 15**, 17, 20(E), 22, and 23.

**What is the issue you would like the board to address and why?** In Units 7 and 15, there are currently registration goat hunts with limited permit numbers. Each year some hunters pick up more than one registration permit even though it is physically impossible to hunt more than one area at a time. When hunters do this it takes opportunities away from other hunters.

**PROPOSED BY:** Tom Young (EG-F22-025)

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## **PROPOSAL 106**

### **5 AAC 92.540(4). Controlled use areas.**

Modify the restrictions for using ATVs to hunt moose in Unit 15C as follows:

Change to delete the restrictions totally.

Change restrictions to read: ATV uses every other week unrestricted.

Change restrictions to read: ATV use every 3 days unrestricted.

**What is the issue you would like the board to address and why?** I am a retired disabled Veteran with limited mobility. For at least 23 years, the Alaska Board of Fish and Game has discriminated against disabled Veterans and disabled Americans, for limited use of All Terrain Vehicles on limited dates in Unit 15C. Oftentimes, not everybody can get off or schedule limited time to go moose hunting in our home area. Why are we, as disabled Alaskans being penalized? I have been doing some research on this matter and found out this rule/regulation was intended for a few guides that use horses for guiding hunters back into Unit 15C. I have also talked to AK Wildlife Troopers and state game biologists advising me to request a change to the regulation. As we all get older, our mobility gets harder. There are a lot of existing trails in the area that can be used.

**PROPOSED BY:** John Reich (EG-F22-002)

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**PROPOSAL 107**

**5 AAC 92.540(5)(b). Controlled use areas.**

Allow an exemption for disabled Veterans to hunt in the Lower Kenai Controlled Use Area in Unit 15C using motorized vehicles as follows:

A veteran upon providing proof of a service-connected disability of 50% or more, may receive an exemption to the "Controlled Use Area ATV restrictions".

**What is the issue you would like the board to address and why?** The Lower Kenai Controlled Use Area in Unit 15C restricts the use of motorized vehicles during the latter days of the hunting season which prevents many disabled Veterans from accessing the hunting grounds. For a disabled Veteran to access the hunting grounds without motorized means essentially eliminates all access for a disabled Veteran who cannot walk or ride a horse. Without a change this restriction will continue to prevent a disabled Veteran from providing for one's family as well as improving the quality of life the Disabled Veteran can still enjoy.

I would like to see some consideration of exempting a verified disabled Veteran with a service-connected disability of 50% or more from this restriction. This change would provide an increased opportunity for those veterans who have already given to this country and now carry the scars of such service.

**PROPOSED BY:** Robert Ward (EG-F22-005)  
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**PROPOSAL 108**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Make all sheep hunts in Units 7 and 15 registration as follows:

Make all Dall sheep hunts in Units 7 and 15 registration hunts. This would give managers the ability to open or close areas based on survey data and allow potential harvests to be aligned with actual sheep numbers, contributing to overall hunt quality for participants.

**What is the issue you would like the board to address and why?** Dall sheep numbers on the Kenai Peninsula have been in drastic decline for a number of years. General season sheep openings are not sustainable given the scarcity of legal rams.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-063)  
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**PROPOSAL 109**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Close sheep hunting on the Kenai Peninsula, Unit 15 as follows:

An easy way to fix the problem would be to simply shut it down. Like I said, it would not affect many hunters and I think you must put the animals first.

**What is the issue you would like the board to address and why?** I think the sheep hunting on the Kenai Peninsula should be shut down. There are few sheep spread thinly throughout the Kenai Peninsula and if you did shut it down it would only affect a small group of hunters. About five sheep are taken a year and two of which are not legal. These five sheep taken could really help the sheep population in the long run and some day you might have a good sheep population. Thanks for your consideration.

**PROPOSED BY:** Rockwell Bates (EG-F22-054)  
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**PROPOSAL 110**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create an archery only registration hunt and youth hunt for sheep in Unit 7 Remainder as follows:

Unit 7 Remainder:

One ram with full curl horn or larger by **Bow and Arrow for certified bowhunters** only; August 10 - September 20.

One ram with full curl horn or larger, by **Bow and Arrow only for certified bowhunters**. Youth hunt only; August 1 - 5.

**What is the issue you would like the board to address and why?** Over the past decade the Unit 7 sheep harvest has decreased to 1 - 3 rams harvested on average per year and about 40 hunters per year hunting the area. In addition, the average ram size ranges in the low to mid 30” range suggesting that rams are being harvested shortly after they first reach legal size. In addition, there is currently no archery sheep hunting area in the entire state of Alaska aside from a narrow corridor along the Dalton highway, very far from where most hunters live. Creating an archery only sheep hunting area would have multiple benefits.

First, it would allow for a place for hunters to safely hunt sheep with a bow without worry of long range shooters shooting over them while stalking. Archery hunters would also much less likely to interrupt each other while on a stalk or approach due the increased observation time and stalking time required.

Second, the existing archery registration hunts, in areas with high concentrations of rams and easy access, have consistently shown that archery sheep hunts allow for increased hunter opportunity while having very little affect on actual sheep populations. This would allow for rams to grow older on average increasing horn size and increasing age diversity in the population. (Of note, research is currently underway in in Alaska to determine if there is a population benefit from having larger numbers of rams and older rams.)

Third, much of Unit 7 is composed of very high use trails and waterways and limiting hunting to short range weapons in this areas will decrease potential or user conflict. Archery hunts have been used with good success in other parts of the state that are more heavily used with good community acceptance.

Fourth, there is a precedent in British Columbia and Alberta for archery only sheep hunting areas and both remain very popular as places where hunters can enjoy the adventure of sheep hunting

with a bow each year with opportunities at legal rams in relative proximity to road systems and populated areas.

Fifth, after a few years of archery only seasons and the subsequent increase in survival of mature rams, this hunt would likely become very popular with sheep hunters, many of whom would welcome the chance to challenge themselves by hunting with archery equipment. This could potentially draw pressure off of other units where sheep populations are known to be suffering and hunter conflict has become more common.

**PROPOSED BY:** Paul Forward (EG-F22-147)  
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**PROPOSAL 111**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create an archery only, registration sheep hunt for residents and nonresidents in Units 7 and 15 Remainder as follows:

**Unit 7 and 15 Remainder: Resident: One ram, with full curl horn or larger, by bow and arrow only from August 1 - August 5, by registration permit available at <http://adfg.alaska.gov>. Certified bowhunters only.**

**Unit 7 and 15 Remainder: Nonresident: One ram, with full curl horn or larger, by bow and arrow only, every four regulatory years from August 1 - August 5, by registration permit available at <http://adfg.alaska.gov>. Certified bowhunters only.**

**Aerial scouting is not allowed during this time period.**

**What is the issue you would like the board to address and why?** There is an increasing interest in bowhunting opportunities for Dall sheep in Alaska but, aside from very low odds draw tags, there are currently no archery seasons or areas for sheep hunting in the Southcentral. This is a proposal for a resident and nonresident, August 1 – August 5 registration archery season for full curl Dall Sheep in Units 7 and 15 Remainder.

During the regular rifle season, bowhunting is difficult to safely achieve given the overall popularity of sheep hunting and the ability of rifle hunters to take very long shots. Bowhunters often spend many hours to days attempting to get within bow range of a particular ram and rifle hunters can easily interfere with any chance of a successful bow hunt. In the worst case, it’s even possible for rifle hunters to unknowingly shoot over the backs of bowhunters stalking sheep, especially in more popular and easily accessible areas.

In addition, there are many nonresident bowhunters who would welcome an opportunity for a guided bow hunt outside of the regular sheep season. Such a season would provide additional revenue for guiding operations and make Alaska a more competitive and appealing option for nonresidents bowhunters planning to book a sheep hunt.

In the past, early bow seasons were rejected by the Board of Game, in part, because of concern that bowhunters would push sheep out of certain areas just prior to the season. In this proposal the bow season would match the existing youth season, August 1 – August 5, thereby giving the sheep

a five-day break from hunting all pressure prior to the general season.

A bowhunting season in Units 7 and 15 Remainder would provide a wonderful opportunity for bowhunters to spend time safely in the mountains and is very unlikely to impact sheep populations and numbers of legal rams. Over the ten-year period from 2009-2018 bowhunters killed about 1% of legal rams taken in the Alaska's general season. Even in the DS140/141 and DS240/241, which are bowhunting only draw hunts for *any ram* in an easily accessible area, the success rate over the same ten-year period was about two – three rams per year for almost 70 tags awarded each year, and only a small fraction of the rams that were killed in these hunts would be considered legal in a full curl only area.

Combined with a short season that is separated from the general season by five days and a very low projected success rate, there is no downside to allowing bowhunters an opportunity to safely pursue sheep each season in this region. It would simply allow bowhunters a short window each year to pursue sheep in a safer and more enjoyable fashion.

Making this a registration hunt would allow for accurate statistics about harvest and use.

In addition, aerial scouting should not be allowed during this season (or any other time while sheep hunting is allowed).

**PROPOSED BY:** Paul Forward (EG-F22-149)

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**PROPOSAL 112**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Establish a general sheep hunting season, open for take by bow and arrow only in Unit 15 Remainder as follows:

General Season

15

Unit 15, Remainder

Nonresidents

Bag limit: One ram with full-curl horn or larger every four regulatory years

Season dates: Aug. 10 – Sept. 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only every four regulatory years**

**Season dates: Sept. 21 – Oct. 5**

Hunt requires harvest ticket

General Season

15

Unit 15, Remainder

Residents only

Bag limit: One ram with full-curl horn or larger

Season dates: Aug 10 – Sept 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only every four regulatory years**

**Season dates: Sept. 21 – Oct. 5**

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would proceed the current general season which, combined with the already existing full curl requirements and limits of archery equipment, would add to the difficulty in harvest and limit impact on sheep populations. This hunt would most likely only result in the taking of a couple of rams per year if any at all.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-154)

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**PROPOSAL 113**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Establish a general sheep season open for take by bow and arrow only, in Unit 7 Remainder as follows:

General Season

07

Unit 7, Remainder

Residents only

Bag limit: One ram with full-curl horn or larger

Season dates: Aug. 10 – Sept. 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only**

**Season dates: Sept 21 – Oct 5**

Hunt requires harvest ticket

General Season

07

Unit 7, Remainder

Nonresidents

Bag limit: One ram with full-curl horn or larger every four regulatory years

Season dates: Aug 10. – Sept. 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only every four regulatory years**

**Season dates: Sept 21 – Oct 5**

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would proceed the current general season which, combined with the already existing full curl requirements and limits of archery equipment, would add to the difficulty in harvest and limit impact on sheep populations. This hunt would most likely only result in the taking of a couple of rams per year if any at all.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-156)  
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**PROPOSAL 114**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the RG331 goat hunt in Unit 7 to an archery only hunt as follows:

RG331 - 1 goat by **Bow and Arrow only for certified bowhunters**, by permit available online at <http://hunt.alaska.gov> or in person in Anchorage, Homer, Palmer, and Soldotna beginning Oct 27 (only selected areas open)

**What is the issue you would like the board to address and why?** RG 331 does not appear to have been opened for several years but does have a resident goat population. Much of the unit also lies within close proximity to very popular hiking and biking trails and is also close to the community of Hope. In addition there are essentially no road accessible registration goat hunting opportunities for archery hunters in the Chugach and Kenai Mountains. Changing RG331 to archery only would allow for increased hunter opportunity, decrease user conflict but avoiding the loud discharges and perceived danger or long range weapons in close proximity to popular trails and community, and would likely have very little impact on the local goat population based on harvest success rates of archery goat hunts. Finally, archery hunters are much less likely to inadvertently harvest a nanny because of the extended amounts of close range observation required to successfully take a goat with a bow.

**PROPOSED BY:** Paul Forward (EG-F22-145)  
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**PROPOSAL 115**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Divide all Unit 15C goat drawing hunts into two seasons as follows:

Modify all goat draw hunts on Kenai Peninsula units to two draw hunts with the first season August 10 to September 15 and the second season September 16 to October 15

**What is the issue you would like the board to address and why?** The draw goat hunts on the Kenai Peninsula have limited access and although there are low number of tags given out annually, hunters still end up competing with other hunters. Also, given the ability to apply for up to six hunts now has made drawing a tag more difficult in some units. Splitting the draw hunts into two hunts would provide more draw opportunities and reduce crowding at popular access locations.

**PROPOSED BY:** Dave Lyon (EG-F22-143)

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**PROPOSAL 116**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the regulation to clarify goat hunters in Unit 15C are restricted from taking goat on the Kenai Peninsula for five years if a nanny is harvested as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(3)

Unit 15(C), that portion beginning at the mouth of Jakalof Creek, then southwesterly along the shore of Kachemak Bay to the mouth of the Port Graham River, then southeasterly up the Port Graham River approximately 6 miles, then southerly up the south fork to the divide, then easterly across the divide to the main drainage that flows into Windy Bay, then southeasterly down the creek to Windy Bay, then easterly along the shoreline to the mouth of Rocky River, then northerly up the Rocky River and Windy River to the divide separating Windy River from

Jakalof Creek, then across that divide to Jakalof Creek, then down Jakalof Creek to the point of origin

1 goat by drawing permit only; **however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years;** the taking of nannies with kids is prohibited

Aug.10—Oct. 15 No open season.  
Nov.1—Nov. 30 No open season.

1 goat by registration permit only; **however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years;** the taking of nannies with kids is prohibited; or

Aug.10—Oct. 15 No open season.  
Nov.1—Nov. 30 No open season.

Unit 15(C), that portion beginning at the mouth of the Port Graham River, then southeasterly up the Port Graham River approximately 6 miles, then southerly up the south fork to the divide, then easterly across the divide to the main drainage that flows into Windy Bay, then southeasterly down the creek to Windy Bay, then along the southern shore of Windy Bay, then westerly along the shore of the Gulf of Alaska and around the tip of the Kenai Peninsula and easterly to the point of origin

1 goat by registration permit only; **however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years;** the taking of nannies with kids is prohibited

Aug.10—Oct. 15 Aug.10—Oct. 15  
Nov.1—Nov. 30 No open season.

**What is the issue you would like the board to address and why?** At the 2019 Board of Game meeting, the board established a new hunt, DG364, and separated the late season of RG364 and RG365 into RG374 and RG375 to aid ADF&G in the distribution of tags and tracking hunts in these management areas. When these new hunts were established, the board was asked to clarify that the five year no hunting penalty that has been listed in the handy dandy hunting regulations applies to all Kenai hunts. Unfortunately, the codified wording was not clarified. Since 2009, the general public including the communities of Seldovia, Nanwalek, and Port Graham have been under the impression that if a hunter harvested a nanny in these hunt areas, he or she was unable to hunt goats on the Kenai Peninsula for five years. The regulation wording available to the general public has read “If a nanny is taken, the hunter is prohibited from hunting any goats in Units 7 & 15 for 5 regulatory years”. The local communities understand the importance of limiting harvest to billies to preserve the integrity of the hunt and encourage their hunters to do so.

**PROPOSED BY:** Seldovia Fish and Game Advisory Committee (EG-F22-039)  
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**PROPOSAL 117**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Implement the penalty for taking nannies in the RG364, 365 and 374 goat hunts in Unit 15C as follows:

Instate the nanny penalty for goat hunts RG 364, 365 and 374. This is housekeeping and should not be an issue.

**What is the issue you would like the board to address and why?** Recently created goat hunts (RG 364, 374 and 365) are on the Kenai end in the area where there is a penalty for taking a nanny this was inadvertently overlooked when the hunts were authorized.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-066)  
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**PROPOSAL 118**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Change the general season, resident bag limit for moose in Unit 15 to include bulls with fork antlers as follows:

One bull with spike-fork antlers on at least one side or 50-inch antlers, or antlers with three or more brow tines on at least one side.

**What is the issue you would like the board to address and why?** The issue I would like the board to address is to look at including fork antlered moose becoming a legal bull again in all of Unit 15, during the general hunting season.

Why: The moose population on the Kenai Peninsula west of the Kenai Mountains is increasing nicely. The increase is largely because of fires, brown bear hunting seasons which in some areas include baiting and a series of relatively easy winters. By including the fork bull as a legal animal, it would bring Unit 15 in line with the Alaska Constitution management plan of sustainable yield

basis. It would also open another opportunity for Alaska families to provide food for the dinner table. Having the fork antlers back would make Unit 15 the same as all other units with spike-fork regulations.

**PROPOSED BY:** Laine Lahndt (HQ-F22-004)  
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**PROPOSAL 119**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Create an archery only moose hunt in Unit 7 Remainder for both residents and nonresidents as follows:

Unit 7 Remainder

Residents and nonresidents

**One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only Aug. 22 – Aug. 29**

**OR**

One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side Sept. 1-Sept. 25.

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would precede the current general season which, combined with the already existing antler restrictions and limits of archery equipment, would add to the difficulty in harvest and limit impact on moose populations. This hunt would mirror exactly the early, bow and arrow only seasons in Units 15A Remainder and 15B Remainder.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-119)  
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**PROPOSAL 120**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Open an archery, fall moose hunt in Unit 15 as follows:

Open moose season, bow and arrow, August 15 to August 30 for a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side

**What is the issue you would like the board to address and why?** I would like to see a bow and arrow opening for moose from August 15 to August 30.

**PROPOSED BY:** Gary Deiman (EG-F22-153)  
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**PROPOSAL 121**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish an early archery only moose hunt in Unit 15C to align with Units 15A and 15B as follows:

Establish an early season, archery only hunt in Unit 15C to run concurrent with the existing archery hunts in Units 15A and 15B.

**What is the issue you would like the board to address and why?** Units 15A and 15B have an early archery only moose season on the Kenai Peninsula. There is no reason not to extend this to Unit 15C. This would bring the entire unit into the same regulations. This would also negate the occasional incident where hunters unknowingly shoot a moose in Unit 15C during the archery season.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-069)  
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**PROPOSAL 122**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish an early, archery only registration moose hunt in Unit 15C to align with Units 15A and 15B as follows:

This is a proposal to establish an early archery only season for moose in Unit 15C. This would be a registration hunt. The dates should reflect the dates for Unit 15A and 15B.

**What is the issue you would like the board to address and why?** Absence of an archery season in Unit 15C for moose. Justification: Units 15A and 15B already have an archery only season and this would simply complete and make consistent this season for the rest of Unit 15.

**PROPOSED BY:** Joseph Brewer (EG-F22-023)  
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**PROPOSAL 123**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish an archery only, fall moose hunt in Unit 15C as follows:

Early moose season bow and arrow only: August 10 - 29.

**What is the issue you would like the board to address and why?** Hopefully granting Unit 15C an early bow and arrow only moose season just like Units 15A and B, from 8/10 - 8/29.

**PROPOSED BY:** Dave Hahn (EG-F22-015)  
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**PROPOSAL 124**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a general moose season open for take by bow and arrow only, in Unit 15C Remainder as follows:

Unit 15C Remainder

Residents

**One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only Aug. 22 - Aug. 29**

**OR**

One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side Sept. 1 - Sept. 25

Nonresidents

**One bull with 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only Aug 22-Aug 29**

**OR**

One bull with 50-inch antlers or antlers with three or more brow tines on at least one side Sept. 1-Sept. 25.

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would precede the current general season which, combined with the already existing antler restrictions and limits of archery equipment, would add to the difficulty in harvest and limit impact on moose populations. This hunt would mirror almost exactly the existing bow and arrow only seasons in Unit 15A Remainder and 15B Remainder.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-120)

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**PROPOSAL 125**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a fall archery hunt for moose in Unit 15C to align with Units 15A and 15B as follows:

Add a taking one bull with spike-fork, three brow tines and 50-inch antlers between Aug. 22 – Aug. 29 in Unit 15C.

**What is the issue you would like the board to address and why?** Unit 15C currently has no archery season for moose. I request that the Board of Game add an archery season that aligns with

the seasons already in place in Units 15A and 15B. These subunits hold less moose than Unit 15C and would help spread out the harvest over the entire unit instead of the areas with higher predator populations and less moose.

**PROPOSED BY:** Caleb Martin (EG-F22-126)

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**PROPOSAL 126**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish an early archery moose hunt in Unit 15C as follows:

I would recommend changing the law so that early moose archery season in Unit 15 includes 15C. It currently excludes Unit 15C.

**What is the issue you would like the board to address and why?** I would like to see the early moose archery season, currently limited to Units 15A and 15B, expanded to include Unit 15C. I see no reason for the current exclusion, and am a hunter in Unit 15C. This proposal is solely in reference to Unit 15.

**PROPOSED BY:** David Lama (HQ-F22-035)

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**PROPOSAL 127**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Extend the TM549 moose hunting season in Unit 15C, Southwest of Point Pogibshi as follows:

**Sept. 1** [AUG. 25] – Sept. 30 **and Nov. 1 - Nov.15.**

**What is the issue you would like the board to address and why?** Extend the TM549 open season for moose in Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky and Windy Bays in order to increase hunter opportunity in the area. Inconsistent weather conditions have in the past limited hunting during the scheduled open season that is currently between August 25 and September 30. Area hunters have been experiencing effects of climate change and moose are migrating and rutting later than usual. A longer season would allow hunters more flexibility to schedule hunts around challenging weather conditions. ADF&G data shows that Tier II TM549 moose harvest has declined in recent years. From 2011-2017 hunter harvest averaged 2.4 moose/year. However, the most recent three-year average is 1.3 moose/year. ADF&G reported that no moose have been harvested between 2010-2021 prior to September 1st. The earliest date of harvest during this time was September 4th.

**PROPOSED BY:** Chugach Regional Resources Commission (EG-F22-049)

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**PROPOSAL 128**

**5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 15C as follows:

This proposal would reauthorize the antlerless moose hunt for the Homer bench (DM549) and the targeted hunt (AM550).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the nonresident drawing hunt: or	Oct. 20—Nov. 20	
...		
1 moose by targeted permit only[,]	Oct. 15—Mar. 31	
NONRESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the resident drawing hunt		Oct. 20—Nov. 20
Remainder of Unit 15(C)		
...		
RESIDENT HUNTERS:		
...		

1 moose by targeted permit only[,]

Oct. 15—Mar. 31

**What is the issue you would like the board to address and why?** Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorization of the Homer bench hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in Unit 15C for the 2023-24 hunting season.

In February 2017, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in a population estimate of 3,529 moose (95% CI: range 2,769–4,289), of which 19% (95% CI: 14–24) were calves. This equates to a density of approximately 3 moose/mi<sup>2</sup> in the census area. Fall composition counts in core count areas during December 2019 provided a bull ratio of 33 bulls:100 cows.

The Homer bench land in Unit 15C, which encompasses the hunt boundary of DM549, contains high densities of moose when deep snow drives moose into human populated areas. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 25 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 63 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-048)  
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**PROPOSAL 129**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Expand the hunt area boundaries for the antlerless moose hunt in Unit 15C as follows:

Expand the boundaries of the Homer cow moose hunt as follows... Beginning at the mouth of Deep Creek then easterly along Deep Creek to Caribou Lake to the outlet of Fox Creek, then south along Fox Creek to the mouth of Fox Creek.

**What is the issue you would like the board to address and why?** Since the inception of the Homer cow moose hunt (DM549) the land that was once open has for the most part been developed and/or posted. This has resulted in increasing conflict as hunting effort is concentrated in only a few legal areas.

Research has shown that cows in Unit 15C wander widely and that expanding the area of the hunt would not be detrimental to the overall moose population.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-064)  
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## **PROPOSAL 130**

### **5 AAC 92.118. Intensive Management Plans IV.**

Renew and update the Unit 15C Intensive Management Plan as follows:

(c) Unit 15(C) Predation Control Area. The Unit 15(C) Predation Control Area is established and consists of all lands within Unit 15(C) north of Kachemak Bay including the Fox River Flats (1,171 square miles); state and private lands are approximately 856 square miles;

(1) this is a continuing **habitat enhancement and predator** control program that was first established by the Board of Game (board) in 2012 for wolf control; it is [CURRENTLY] designed to increase moose **abundance** [NUMBERS] and harvest by **improving habitat and** reducing predation on moose by wolves and is expected to [MAKE A CONTRIBUTION TO ACHIEVING] **maintain** the intensive management (IM) objectives in Unit 15(C);

(2) moose and wolf objectives are as follows:

(A) moose IM population objectives for Unit 15(C) as established in 5 AAC 92.108 are 2,500 - 3,500 moose. This objective is within the range of historic population estimates; the bull-to-cow objective is 20 - 25:100 for Unit 15(C);

(B) the moose harvest objectives for Unit 15(C) is 200 - 350 moose; which is eight percent of the low population objective and 10 percent of the high population objective;

(C) the department has determined that wolves can be removed from public and private lands within the control area to the extent possible without affecting the sustainability of the wolf population in Unit 15(C) because the control area is approximately 33 percent of Unit 15(C) and does not include all lands that the wolf population occupies;

(3) findings concerning populations and human use are as follows:

(A) **repealed** \_\_ / \_\_ / \_\_\_\_;

(B) wolf predation is likely **a factor in the failure to achieve moose population and harvest objectives** [AN IMPORTANT CAUSE OF THE FAILURE TO ACHIEVE THESE OBJECTIVES];

(C) a reduction in wolf predation in Unit 15(C) may make progress toward achieving the Unit 15(C) IM harvest objectives for moose;

(D) reducing wolf predation **is likely to be effective and feasible using** [HAS BEEN EFFECTIVE UTILIZING] recognized and prudent active management techniques and based on scientific information;

(E) reducing wolf numbers is likely to be effective given land ownership patterns if conducted by department personnel;

(F) **repealed** \_\_ / \_\_ / \_\_\_\_;

(4) authorized methods and means are as follows:

(A) hunting and trapping of wolves by the public in the Unit 15(C) Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits as a method for wolf removal

under AS 16.05.783;

(C) department personnel will be allowed to conduct aerial wolf removal using aircraft under AS 16.05.783.

(5) time frame is as follows:

(A) through **June 30, 2029** [JULY 1, 2022], the commissioner may authorize the removal of wolves in the Unit 15(C) Predation Control Area;

(B) annually the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose and wolf populations, and recommendations for changes, if necessary to achieve the objectives of the plan.

(6) the commissioner will review, modify, or suspend program activities as follows:

(A) when the mid-point of the IM population and harvest objectives for the moose population are achieved;

(B) if, after three years, the harvest of wolves is not sufficient to make progress towards the IM population objectives for wolves;

(C) wolf predation control activities may be suspended:

(i) if, after three years, there is no detectable increase in the total harvest of moose in the control area;

(ii) if, after three years, any measure **such as twinning rates and short-yearling mass**, consistent with significant levels of nutritional stress in the moose population is identified;

(iii) when the moose population and harvest objectives within Unit 15(C) have been met; or

(iv) if the population exceeds a density of 3.0 moose per square mile;

**(7) The department may plan and execute habitat enhancement projects in areas identified for improvement based on evidence at the landscape or population level through prescribed burns, wildfire, or mechanical means to increase the potential carrying capacity across the range in the Unit 15(C) Predation Control Area.**

**What is the issue you would like the board to address and why?** The Unit 15C Intensive Management (IM) plan expires July 1, 2022. Due to rescheduling of board meetings due to the CoV-SARS 2 pandemic this proposal will be presented to the board after expiration. The department would like to have the plan reauthorized with predator control and habitat enhancement options. While the Unit 15C moose population and harvest objectives are currently being met the department sees a benefit to reauthorizing and updating the plan. Updates to the plan include adding habitat enhancement, which was not the focus in the initial IM plan development. The department's intent is to utilize habitat work to maintain moose populations within objectives, which will support meeting harvest objectives. Several habitat enhancement operations are being developed for use in Unit 15C and because of recent fire activity the department has the opportunity to research and monitor habitat changes over time.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-058)

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**PROPOSAL 131**

**5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 20	Aug. 20—Sept. 20
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective.

In response to concerns that the moose population on Kalgin Island had exceeded the island’s carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective.

During the most recent moose survey, department staff counted 30 moose on Kalgin Island in February 2022. However, this survey suffered from poor conditions for detecting moose and long term data indicates the population has been relatively stable for 10 years. This count is within the population objective of 20–40 moose. In the last 10 years, an average of 121 permits were issued for this hunt; of which 91 permittees hunted, with an annual average harvest of 30 moose.

The any moose registration hunt is recommended to provide liberal harvest opportunity on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make over-harvest unlikely.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-049)  
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**PROPOSAL 132**

**5 AAC 92.171(b). Sealing of horns and antlers.**

Remove the antler sealing requirement for moose harvested on Kalgin Island and from the TM549 Tier II subsistence area as follows:

5 AAC 92.171(b).

(b) A person may not alter, possess, transport, or export from the state, the antlers of a moose taken in any hunt in Units 7, excluding the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and 15, **excluding Kalgin Island and that portion of Unit 15C southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay**, unless the antlers have been permanently sealed by a department representative within 10 days after the taking, or a lesser time if designated by the department.

**What is the issue you would like the board to address and why?** During the 2010 Board of Game meeting the board passed a regulation requiring all antlers from moose harvested on the Kenai Peninsula be sealed by a department representative. When this regulation was established, the Tier II subsistence moose hunt (TM549) was unintentionally included, and Kalgin Island was located in Unit 16. The bag limit on Kalgin Island is one moose, and the bag limit in the Tier II hunt is one bull. The sealing requirement in Units 7 and 15 was established to address the take of sublegal bulls, and because neither of these areas has antler restrictions there is no need to seal moose harvested in those hunts.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-062)  
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**PROPOSAL 133**

**5 AAC 92.085. Unlawful methods of taking big game, exceptions.**

Prohibit the taking of black bear from boats in Unit 15C as follows:

Illegal to shoot black bear from boat in Unit 15C.

**What is the issue you would like the board to address and why?** Currently it is legal to shoot black bear from a boat in Unit 15C. This is confusing as it is prohibited in Unit 6D, Prince William sound.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-065)  
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**PROPOSAL 134**

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

Extend the brown bear season in Units 7 and 15 as follows:

Change hunting regulations to read:

One bear every regulatory year by permit available online at <http://hunt.alaska.gov> or in person in Anchorage, Homer, Palmer, and Soldotna beginning Aug. 4.

RB300 August 10 - June 30

**What is the issue you would like the board to address and why?** Currently, Units 7 and 15 brown bear seasons start in September and end May 30th. Brown bears are commonly seen on sheep hunts and close to residential areas in August. Due to the season not starting yet, these conflicts must be handled by agencies rather than the public. Furthermore, brown bears are commonly seen on black bear bait sites in June and can be seen with a full hide even late in the season. It is not known exactly when a bear will or will not rub. The trophy value of a bear or if it is too rubbed should be left to the hunter to make a determination when he has the opportunity. It is common to see rubbed bears during the season early just as it is late. If the season is open to match the black bear season, hunters could have more opportunity to take these late season bears that have still full hides.

**PROPOSED BY:** Caleb Martin (EG-F22-134)  
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**PROPOSAL 135**

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

Extend the brown bear season in Unit 15 from May 31 to June 30, to align with the black bear baiting season as follows:

Brown /Grizzly Bear season: Sept. 1<sup>st</sup> - June 30<sup>th</sup>.

**What is the issue you would like the board to address and why?** Brown bear season in Unit 15, for hunting opportunity and season alignment with the black bear baiting season.

**PROPOSED BY:** Wayne Ctibor and Dennis Johns (EG-F22-074 and 076)  
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**PROPOSAL 136**

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

Extend the season for the brown bear registration hunts in Units 7 and 15 to June 15 as follows:

Brown bear

Units 7 and 15

1 brown bear every year by registration permit only

Resident season

Nonresident season

Sept. 1 to [MAY 31] **June 15**

Sept. 1 to [MAY 31] **June 15**

**What is the issue you would like the board to address and why?** Lost brown bear hunting opportunity during the spring season on the Kenai Peninsula, Units 7 and 15. Hunting for brown bear on the Kenai Peninsula is closely managed using an annual harvest quota of 50 to 60 bears or 8-12 females five years old or older, from all known mortality. Harvested brown bear in these Units must be reported to ADF&G within five days and presented for sealing within ten days. Since this quota management system has been in place (fall of 2013), the season has only been closed one time on the Kenai National Refuge portion of Unit 15. The hunting method of baiting

bears is allowed on the Kenai National Refuge for black bear, but it is not allowed for brown bear.

A review of brown bears seasons reveals 12 units or portions of units have spring seasons ending either June 15 or June 30. Unit 13 has an open season all year.

There will be some concern about harvesting a bear with a poor-quality hide if hunting is extended later in the spring. However, some bears have poor-quality hides in the fall and spring. Hunters can be selective and avoid harvesting a bear with a rubbed hide.

**PROPOSED BY:** Ted Spraker (EG-F22-055)  
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**PROPOSAL 137**

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

Extend the brown bear registration hunt (RB300) in Unit 7 to June 15 as follows:

Extend RB300 to June 15<sup>th</sup>.

**What is the issue you would like the board to address and why?** Brown bear season ends May 31st for RB300. I am looking to extend it to June 15th. It seems the brown bears in this Unit rut later for higher elevations and I believe extending the season would assist hunters in success. This would also increase opportunity for Alaskan residents

**PROPOSED BY:** Brian Watkins (EG-F22-006)  
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**PROPOSAL 138**

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

Extend the brown bear season in Unit 15 to June 15 as follows:

The new regulation would say: Sept. 1<sup>st</sup> - June 15th.

**What is the issue you would like the board to address and why?** Brown bear season dates. I believe the season closes to early, in my observations I believe the bear movement is just starting to pick up for the spring season when the current season closes.

**PROPOSED BY:** Danielle Wendt (EG-F22-050)  
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**PROPOSAL 139**

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

Extend the brown bear season for the RB300 hunt in Units 7 and 15 to June 15 as follows:

All of Units 7 and 15, where hunting is legal:

One brown bear, every regulatory year by permit Sept 1- **June 15** [May 31]

**What is the issue you would like the board to address and why?** There seems to be a very

stable brown bear population in units 7 and 15 and the opportunity to pursue them after May 31 should not have a negative impact. This area is already a registration hunt so ADF&G could close it early if too many bears were being taken. A few more bears taken would surely help the moose population as well.

**PROPOSED BY:** Logan Kurtz (EG-F22-158)

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**PROPOSAL 140**

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

Extend the season for brown bear under RB300 open for take by bow and arrow only, in Units 7 and 15 as follows:

RB300

All of Unit 7 and 15, where hunting is legal.

Residents and Nonresidents

One (1) brown bear, every regulatory year by permit Sept. 1-May 31

**OR**

**All of Unit 7 and 15, where hunting is legal excluding within 1/2 mile of the Russian and Kenai Rivers.**

**Residents and Nonresidents**

**One (1) brown bear, every regulatory year by permit, by bow and arrow only June 1 - June 30**

**What is the issue you would like the board to address and why?** Adding additional hunting days that are restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. Members of our organization have reported seeing a rise in brown bear activity on the Kenai Peninsula and desire an extended time in which to pursue them during the spring season. We believe that this extension can be accomplished without having a big impact on brown bear populations if it is restricted to the use of archery equipment only. This hunt is already a registration hunt and the department can easily close it by emergency order if deemed necessary. It should be remembered that this hunt currently has an unlimited number of permits to be issued. The geographic restrictions as well as the limits of archery equipment would add to the difficulty in harvest, limiting impact on brown bear populations while also providing more opportunity for hunters to pursue bears.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-123)

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**PROPOSAL 141**

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

Lengthen the bear baiting season in Unit 7 as follows:

Unit 7 Dates: April 1- June 30<sup>th</sup>

**What is the issue you would like the board to address and why?** Baiting season in Unit 7 currently runs April 15 - June 30. I am proposing the season start date be changed to April 1st. My justification is hunter safety. A season that starts two weeks earlier creates less dangerous conditions for hunters due to; avalanches, open creeks, and open lakes. I have been baiting in Unit 7 for a decade and the bear harvest should not be affected by the earlier start date. April 15th is typically close to when over flow is rampant on lakes and avalanche danger from longer, warmer days is prevalent. It would be safer for hunters to get their initial set up in two weeks earlier

**PROPOSED BY:** Brian Watkins (EG-F22-009)  
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**PROPOSAL 142**

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

Lengthen the brown bear baiting season in Unit 15 as follows:

Start the bear baiting season April 1 instead of April 15.

**What is the issue you would like the board to address and why?** Open bear baiting start from April 1 instead of April 15.

**PROPOSED BY:** Gary Deiman (EG-F22-155)  
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**PROPOSAL 143**

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

Restrict bear bait stations within a half mile of certain structures in Unit 15 as follows:

Change the restriction from 1 mile to 1/2 mile from structure.

You may not set up a bait station within 1/2 mile of a:

- house (including your own)
- school
- business
- ETC

**What is the issue you would like the board to address and why?** Setting up bear baits within 1 mile of a structure. Restricts access to a lot of land for bear baiting.

**PROPOSED BY:** Danielle Wendt (EG-F22-051)  
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**PROPOSAL 144**

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

Define "developed recreation facility" and "permanent dwelling" for bear baiting in Units 15 and 7 as follows:

I would ask the Board of Game to define “developed recreational facility” as a state-maintained multiuse area that provides services for shooting, launching of watercraft, or camping. It also must include signage and buildings that are regularly maintained for the purpose of recreation.

I would ask the board to define “permanent dwelling” as a structure permanently fixed in place, legally owned by the public or a private individual, and occupied for a minimum of 30 days per year.

**What is the issue you would like the board to address and why?** Currently for bear baiting in Units 15 and 7 the regulations read:

- 5) a person may not use bait or scent lures within
  - (A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;
  - (B) one mile of a
    - (i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on the opposite side of a major river system, as identified by the department in the permit, from the bear baiting station;
    - (ii) business; or
    - (iii) school; or
  - (C) one mile of a developed campground or developed recreational facility;

**There is no definition of what a permanent dwelling or recreational facility is.** When I spoke to three different Alaska Wildlife Troopers and multiple ADF&G offices, not only was there different answers, but several officials assumed it was up to the INTERPRETATION of the wildlife officers to determine how to define these areas. I have spoken to many members of the public who have spoken about getting fined or had to prove in court what is, or is not legal when it comes to these areas. One officer may determine a bait site legal, while another may charge a hunter. The regulations currently allow an officer to determine a duck blind, tree stand or any type of structure as a permanent dwelling with no recourse when the courts determine otherwise.

**PROPOSED BY:** Caleb Martin (EG-F22-130)  
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**PROPOSAL 145**

**5 AAC 92.510. Areas closed to hunting.**

**5 AAC 92.550. Areas closed to trapping.**

Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15 as follows:

**5 AAC 92.510. Areas closed to hunting.**

Amend to include all lands within ¼ mile of the five wildlife structures (including the structures themselves) being constructed as part of the Sterling Highway MP 45-60 Project: two underpasses and one overpass in Unit 7 and two underpasses in Unit 15A.

**5 AAC 92.550. Areas closed to trapping.**

Amend to include all lands within ¼ mile of the five wildlife structures (including the structures themselves) being constructed as part of the Sterling Highway MP 45-60 Project: two underpasses and one overpass in Unit 7 and two underpasses in Unit 15A.

**What is the issue you would like the board to address and why?** The Sterling Highway mile post (MP) 45-60 Project (aka Cooper Landing Bypass) includes more than \$10.5 million in mitigation for wildlife crossings including four underpasses and the first overpass in Alaska. Two underpasses are in Unit 15A between Jim’s Landing and Sportsman’s Landing along the existing highway; two underpasses and one vegetated overpass are in Unit 7 between Sportsman’s Landing and Cooper Landing along the new bypass.

These structures are expected to help reduce moose-vehicle collisions (that average more than \$35,000 per incident in damage, injury and sometimes human death according to the Alaska Moose Federation) and allow for other wildlife species to move unimpeded across a road segment that currently averages > 1.2 million vehicles per year.

Cameras installed to monitor similar wildlife underpasses on the adjacent Sterling Highway MP 58-79 through the Kenai National Wildlife Refuge have already documented use by moose, lynx, snowshoe hare, brown and black bears, porcupine, caribou, river otter, ermine, mink, ducks and sandhill cranes. More wildlife use is expected once game trails become well established, a likely outcome because trapping and hunting around those structures are incidentally prohibited by other safety restrictions imposed by the Refuge near roads, campgrounds, trailheads, and buildings.

However, the new structures being installed on the Sterling Highway MP 45-60 project do not have protections for wildlife while they use them. Without a change in regulation, hunting and trapping would be permitted on and at the entrance/exit of multi-million dollar structures meant to create safe passage across the highway; these underpasses and this bypass, meant to benefit wildlife, could turn into a population sink.

We seek to ensure that the \$10+ million investment of public funds to help wildlife navigate an increasingly congested part of the Kenai Peninsula is honored by State hunting and trapping regulations.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-032)

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**PROPOSAL 146**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks on specific trails within the Kachemak Bay State Park in Unit 15C as follows:

**5 AAC 92.550 Areas closed to trapping.**

.....(4) Unit 15:

...

**(E) Those portions in Unit 15C that are within 100 yards from the Diamond Creek Trail, the Grewingk Glacier Lake Trail and the Grewingk Saddle Trail are closed to trapping.**

**What is the issue you would like the board to address and why?** Require a 100-yard setback of traps from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail within Kachemak Bay State Park. These trails are heavily used by the public during trapping season, accompanied by their dogs.

Other considerations, including appropriate signage warning park users of traps during trapping seasons, would help avoid conflicts but is labor intensive and requires funding which is currently not available.

Requiring [ark visitors to have their dogs on a leash during trapping season is another option. Skiing and snowshoeing with a dog on a leash is difficult and is not adhered to. Our rangers are already strapped with responsibilities and regulation enforcement is difficult at best.

Requiring trappers to get permits in the park, like Chugach State Park, would better educate users but would again require unavailable staff time, energy and additional funding.

If nothing is changed, dogs getting caught in traps will increase causing unnecessary trauma to [ark users and dogs, and huge public outcry. User conflicts are time consuming and energy draining for all involved. Already overtaxed and underfunded, ADF&G employees and Park staff will be increasingly burdened.

**PROPOSED BY:** Kachemak Bay State Park Citizen Advisory Board (EG-F22-030)  
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**PROPOSAL 147**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along certain snow machine and Nordic ski trails in Unit 15C as follows:

We recommend no trapping within 100 yards from Snomad mapped trails in Unit 15C and 100 yards from Kachemak Nordic Ski Club Trails in Unit 15C.

**5 AAC 92.550**

**(4) Unit 15C**

...

**E. within 100 yards from Snomad trails in 15(C);**

**F. within 100 yards from Kachemak Nordic Ski Club Trails in 15(C).**

**What is the issue you would like the board to address and why?** With a growing population on the lower Kenai Peninsula and an increase in non-consumptive users on multi-use trails, conflict with traditional trapping areas and incidents of pet dogs being caught in traps is becoming more common in Unit 15C.

Local trappers, non-consumptive trail users, and the Homer AC working together propose that: traps set adjacent to public mapped trails in Unit 15C be at least 100 yards from the main trail.

If a 100-yard setback is not implemented, there will be more user conflicts on public trails, as the number of non-consumptive users increases on public trails in winter each year in Unit 15C.

**PROPOSED BY:** Homer Fish and Game Advisory Committee, Sid Wolford and Kathy Sarns Irwin (EG-F22-048)  
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**PROPOSAL 148**

**5 AAC 92.550. Areas closed to trapping.**

Require 100-yard trapping setbacks from known multi-use trails in Unit 7 as follows:

I propose that traplines need to be set up, say 100 yards from known multi-use trails.

**What is the issue you would like the board to address and why?** I live in Seward. Last winter on popular trails in the area, trappers were setting up traplines directly on the side of trails. I understand that this is not illegal but they are catching people’s dogs on these trails and causing quite a bit of user conflict.

**PROPOSED BY:** Jacob Swartz (EG-F22-098)  
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**PROPOSAL 149**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along the perimeter of campgrounds in Unit 7 as follows:

**1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along the perimeter of the campgrounds listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing campgrounds in the Cooper Landing area.

2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards on all sides of the campgrounds listed. Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from all sides of the campgrounds listed.”**

- Quartz Creek Campground
- Crescent Creek Campground
- Russian River Campground
- Cooper Creek Campgrounds, North & South

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state-managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

**What is the issue you would like the board to address and why?**

1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along the perimeter of the campgrounds listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets’ utilizing campgrounds in the Cooper Landing area.

Unit	Campground Name	Location	Winter Uses
7	Quartz Creek Campground	Mile 1 Quartz Creek Road, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Crescent Creek Campground	Mile 3 Quartz Creek Road, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Russian River Campground	Entrance is Mile 53 Sterling Highway, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,

7	Cooper Creek Campgrounds, North & South	Mile 50.7 Sterling Highway, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
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2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area’s economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from campgrounds, trap placements close to campgrounds, present a very real danger, especially for young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near campgrounds, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers’ opportunity to trap near a campground. Proposing setbacks for campgrounds still leave most other areas unrestricted to trapping. Trappers who follow the Trapper’s Code of Ethics’ third tenant, to “promote trapping methods that will reduce the possibility of catching non-target animals,” most likely already set traps back from campgrounds. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups’ safety. These proposed setbacks would also align with the Forest Service’s Our Values Statement, which includes the intention of managing for “*Safety. In every way: physical, psychological, and social.*”

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than 1 minute. **A local Cooper Landing trapper, as well as trappers from other nearby GMUs, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game’s ability to manage wildlife along the listed campgrounds. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit

system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes all public campgrounds accessed by a variety of users groups during the trapping season. The campgrounds that we have proposed for trapping setbacks are used for: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-008)  
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## **PROPOSAL150**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along certain roads and pullouts in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular roads and pullouts in the Cooper Landing area.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: "Trap setback of 100-yards on both sides of roads and all sides of pullouts listed. Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from the road or pullout."**

- Quartz Creek Road - Quartz Creek Road from its intersection with the Sterling Highway to the powerline crossing at approximately mile 2.5.
- Quartz Creek Road - From powerline crossing to Crescent Creek Trailhead at mile 3.5(used in winter for skiing)
- East Quartz Creek and Williams Road - Entire East Quartz Creek Road

from its intersection with Quartz Creek Road and Williams Road

- Old Sterling Highway (unmaintained portion of Quartz Creek Road) - Old Sterling Highway from the Crescent Creek Trailhead to Tern Lake Rest and Picnic area
- Snug Harbor Road - The first 2.8 miles of Snug Harbor Road from its intersection with the Sterling Highway to the entrance of the Chugach Electric Power Station
- Bean Creek Road - The entire distance from the Sterling Hwy to end.

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

**What is the issue you would like the board to address and why?**

1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular roads and pullouts in the Cooper Landing area.

Unit	Road or Pullout Name:	Description	Winter Uses
7	Quartz Creek Road	Quartz Creek Road from its intersection with the Sterling Highway to the powerline crossing at approximately mile 2.5.	Walking, hiking, fat tire biking
7	Quartz Creek Road	From powerline crossing to Crescent Creek Trailhead at mile 3.5	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, and access to backcountry skiing
7	East Quartz Creek and Williams Road	Entire East Quartz Creek Road from its intersection with Quartz Creek Road and Williams Road	Walking, hiking, fat tire biking,

7	Old Sterling Highway (unmaintained portion of Quartz Creek Road)	Old Sterling Highway from the Crescent Creek Trailhead to Tern Lake Rest and Picnic area	Cross-country skiing, access to backcountry skiing, snowshoeing, hiking, skijoring, snowmachine use
7	Snug Harbor Road	The first 2.8 miles of Snug Harbor Road from its intersection with the Sterling Highway to the entrance of the Chugach Electric Power Station	Walking, hiking, fat tire biking
7	Bean Creek Road	The entire distance. This road is mostly surrounded by private property, but unless posted, traps can be set.	Walking, hiking, fat tire biking
7	Russian Gap Road	The entire distance. This road is mostly surrounded by private property, but unless posted, traps can be set.	Walking, hiking fat-tire biking
	All vehicle pullouts along the Sterling Highway	Pullouts along the Sterling Highway from its junction with the Seward Highway to the entrance to the Russian River Ferry and Boat Launch	People use these pullouts to let their animals and children take bathroom breaks, stretch their legs, take in the views and gear up for backcountry activities

2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from roads and pullouts, trap placements close

to roadways, or in pullouts, present a very real danger, especially for young children and pets. As

of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near roads and pullouts, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers' opportunity to trap near a road or pullout. Proposing setbacks for only the most popular and heavily used roads and pullouts leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used roads and pullouts. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than one minute. **A local Cooper Landing trapper, as well as trappers from other nearby Units, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game's ability to manage wildlife along the listed roads and pullouts. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100- yard setback from trails has been submitted and endorsed by the Homer Advisory Committee. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes only the most popular roads and pullouts accessed by a variety of users groups during the trapping season. The popular roadways and pullouts that we have proposed for trapping setbacks are used for: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-009)  
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## **PROPOSAL 151**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along highway pullouts, backcountry access points, and winter trails in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails described in the table provided. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of backcountry user groups to Unit 7.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards along the perimeter of highway pullouts accessing backcountry areas along the Seward Highway, and on both sides of the winter trails listed within the Summit Lake Recreational Area. However, traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from the trail or pullout.”**

- Japan Woods - The west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) north to Colorado Creek (MP 46.5).
- Tenderfoot Campground – Ski Area - MP 46 of the Seward Highway.
- Park N Poke - The west side of the Seward Highway from the southern-most tip of Lower Summit Lake (MP 47) to the gravel pit at (MP 49).
- Manitoba Mountain - MP 48 of the Seward Highway, pullout on the east side of the highway for the Alaska Mountain Huts (non-profit organization), following the established .7-mile trail to the Manitoba Cabin, and up the Polly Mine Trail (1 mile) to where it meets with the Manitoba Mountain Trail and continuing up to tree line at the summit of Little Manitoba Mountain.

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

### **What is the issue you would like the board to address and why?**

#### **1) ISSUE:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails described in the table provided. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of backcountry user groups to Unit 7

Unit	Trail Name	Description	Winter Uses
7	Japan woods	The west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) north to Colorado Creek (MP 46.5).	Backcountry skiing, snowshoeing, bird hunting, hiking
7	Tenderfoot Campground – Ski Area	MP 46 of the Seward Highway.	Backcountry skiing, cross-country skiing, snowshoeing, bird hunting, hiking, snow machine use
7	Park N Poke	The west side of the Seward Highway from the southern-most tip of Lower Summit Lake (MP 47) to the gravel pit at (MP 49).	Backcountry Skiing, snowshoeing, bird hunting, hiking
7	Manitoba Mountain	MP 48 of the Seward Highway, pullout on the east side of the highway for the Alaska Mountain Huts (non-profit organization), following the established .7-mile trail to the Manitoba Cabin, and up the Polly Mine Trail (1 mile) to where it meets with the Manitoba Mountain Trail and continuing to tree line at the summit of Little Manitoba Mountain. <a href="https://www.alaskahuts.org/manitoba-hiking-guide/">https://www.alaskahuts.org/manitoba-hiking-guide/</a>	Backcountry and cross- country skiing, snowshoeing, bird hunting, hiking, backpacking for camping and cabin use

Note: Maps for the following proposal are available at: [https://www.cnfaic.org/wp-content/uploads/2013/10/Summit\\_Lake\\_Area.jpg](https://www.cnfaic.org/wp-content/uploads/2013/10/Summit_Lake_Area.jpg)

## 2) WHY:

Trapping setbacks would establish safe zones for user groups accessing backcountry areas for: cross-country skiing, backcountry skiing, snowboarding, snowshoeing, ice fishing, bird hunting, cabin rentals and more.

Trapping setbacks would reduce some of the dangers to safety personnel called to respond to an area requiring the use of search and rescue dogs to find injured, lost, or buried victims.

The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings.

To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates **2,500 to 3,500** trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses. It would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social*".

A survey conducted in Cooper Landing by the Cooper Landing Safe Trails Committee, in March 2021, found that 90% of respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt that setbacks were unnecessary. **A local Cooper Landing trapper, as well as trappers from other nearby GMU's, have endorsed a 100-yard setback as reasonable and logical.**

A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer Advisory Committee. Having regulations that are consistent within the region will make management, education, and enforcement easier in Units 7 and 15.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-011)  
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## **PROPOSAL 152**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along trails and trailheads in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the trailheads listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use trails in the Cooper Landing area.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: "Trap setback of 100-yards on both sides of the trails and trailheads listed. Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from the trail."**

- Crescent Creek Trail
- Lower Russian Lake Trail
- Bean Creek Trail

- Russian Gap Trail/Historic Quartz Creek Trail
- Resurrection Trail, South End
- West Juneau Bench Trail
- Devil's Pass Ski Loops
- Stetson Trail parking area and first 400 yards

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

**What is the issue you would like the board to address and why?**

1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the trailheads listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use trails in the Cooper Landing area.

Unit	Trail Name	Description	Winter Uses
7	Crescent Creek Trail  USGS Map Seward B7, C7 and C8  USFS, Chugach National Forest Map for Crescent Creek Trail	Begins at Crescent Creek Trailhead parking area at mile 3.5 of Quartz Creek Road and ascends 6.5 miles to the Crescent Lake Cabin at the west end of the lake.	Backcountry skiing, snowshoeing, hiking, backpacking, fat tire biking, and access to public use cabins
7	Lower Russian Lake Trail  USGS Map Seward B8, Kenai B1  USFS, Chugach National Forest Map for Russian Lakes Trail	Lower Russian Lake Trail from the trailhead parking located in the Russian River Campground about 1.0 miles from the campground entrance to both the Barber Cabin on the shore of Lower Russian Lake and to the Russian River Falls Overlook.	Backcountry and cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, backpacking and access to public use cabins

7	Bean Creek Trail	Bean Creek Trail starting at its trailhead at mile 0.5 of the west end of Slaughter Ridge Road to its intersection of the main Resurrection Pass Trail above Juneau Falls.	Backcountry and cross-country skiing, snowshoeing, hiking, fat tire biking, snow machining, dog mushing, backpacking, and access to public use cabins
7	Russian Gap Trail/Historic Quartz Creek Trail	This trail is referred to as the Quartz Creek Trail on the 2004 plat approved by the Kenai Peninsula Borough for the Russian Gap Subdivision. This trail ascends behind the west side of KPB parcel 11912507 and continues through parcel 11912513, connecting with the Russian Gap Trail and heading north easterly along a bench below Russian Gap.	Backcountry and cross-country skiing, snowshoeing, hiking, snowmachine use
7	Resurrection Trail, South End USGS Maps Seward B8, C8 and D8	From the southern Resurrection Trail trailhead on the Sterling Highway continuing to the Swan Lake public use cabin	Backcountry and cross-country skiing, snowshoeing, hiking, fat tire biking, backpacking and access to public use cabins
7	West Juneau Bench Trail USGS Maps Seward B8, C8 and D8	From the Sterling Highway pullout at mile 53.25 just west of the southern Resurrection Trail trailhead continuing to its intersection with the Resurrection Trail.	Back country and cross-country skiing, snowshoeing, hiking, snow machining, fat tire biking, backpacking for camping and cabin use

7	Devil's Pass Ski Loops USGS Map Seward C7 and C8 USFS, Chugach National Forest Map for Devil's Pass Trail	These trails begin at the far end of the parking area for Devil's Pass Trail head at mile 39.5 of the Seward Highway. They loop along the cleared area to the northeast of the parking lot between Quartz Creek and the Seward Highway.	Backcountry ski access, cross country skiing, snowshoeing, fat-tire biking, skijoring
7	Stetson Creek Parking area and Trail	Stetson Trail parking area at milepost 50.7 of Sterling Highway. Setback of 100 yards around clearing beyond gate under the power line and first 400 yards up the trail.	Cooper Landing EMT training, search and rescue dog training, hiking and snowshoeing

2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the number of winter trail users has increased immensely over the past 20 years, so have the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from multi-use trails, trap placements close to (or in) trails and trailheads present a very real danger to all users, especially young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to use these multi-use trails, we are seeking trapping regulation that will ensure the safety of all trail users.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers' opportunity along multi-use trails. Proposing setbacks for only the most popular

and heavily used multi-use trails leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used

trails. The setbacks we are requesting will not unduly impact trappers and will greatly improve trail user safety. These proposed setbacks would also align with the Forest Service’s Our Values Statement, which includes the intention of managing for “*Safety. In every way: physical, psychological, and social.*”

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than one minute. **A local Cooper Landing trapper, as well as trappers from other nearby GMUs, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game’s ability to manage wildlife along the listed trails. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary. 86-89% responded in favor of setbacks along the trails and trailheads listed above, while 10-12% did not feel they were necessary.

Our proposal includes only the most popular multi-use trails used by a variety of users during the trapping season. Popular trail uses in our area include: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping. The Stetson Trail parking area and first 400 yards has been utilized for search and rescue dog training which is critical to the active avalanche areas close by.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates **2,500 to 3,500** trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-012)  
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## **PROPOSAL 153**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along Kenai Lake beaches in Unit 7 as follows:

#### 1) SOLUTION:

We are requesting the Board of Game amend 5 ACC 92.550 to establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake as described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use beaches in the Cooper Landing area.

#### 2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards from mean high-water mark of Kenai Lake on the north side from the Kenai River Bridge to 1 mile past the end of Williams Road and on the south side from the Kenai River Bridge to ¼ mile past the powerline crossing (powerline is at mile 2.8 Snug Harbor Road), also, Kenai Lake Beach (Locally known as Waikiki Beach) ¼ mile north to ¼ mile south of the lake access road at mile 5.8 Snug Harbor Road. Traps with an inside spread of 5 inches or less which are at least 5 feet above the ground or snow level are allowed if more than 50-yards from the beach.”**

- Kenai Lake Beaches
- Kenai Lake Beach (Waikiki Beach)

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

### **What is the issue you would like the board to address and why?**

#### 1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake as described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use beaches in the Cooper Landing area.

Unit	Beach Area	Description	Winter Uses
7	Kenai Lake Beaches	Kenai Lake Beaches: on the North side from the Kenai River Bridge to 1 mile past the end of Williams Road and on the south side from the Kenai River Bridge to ¼ mile past the powerline crossing (powerline is at mile 2.8 Snug Harbor Road). <i>Area from the mean high-water mark to 100yds back.</i>	Cross-country skiing, snowshoeing, hiking, fat tire biking, skjoring, snow machining
7	Kenai Lake Beach	Kenai Lake Beach (Locally known as Waikiki Beach) ¼ mile north to ¼ mile south of the lake access road at mile 5.8 Snug Harbor Road. <i>Area from the mean high-water mark to 100yds back.</i>	Cross-country skiing, snowshoeing, hiking, fat tire biking, skjoring, snow machining

## 2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area’s economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from popular beaches, trap placements close to (or on) multi-use beaches present a very real danger to all users, especially young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near beaches, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers’ opportunity to trap near beaches. Proposing setbacks for only the most popular and heavily used beaches leaves all other areas unrestricted. Trappers who follow the Trapper’s Code of Ethics’ third tenant, to “promote trapping methods that will reduce the possibility of catching non-target animals,” most likely already set traps back from heavily used beaches. The setbacks

we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than 1 minute. **A local Cooper Landing trapper, as well as trappers from other nearby Units, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game's ability to manage wildlife along the listed beaches. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes only the most popular beaches used by a variety of user groups during the trapping season. Popular beach uses in our area include: cross-country skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-007)  
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## **PROPOSAL 154**

**5 AAC 92.550. Areas closed to trapping.**

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

Require signs be posted at all active trapping access points in Unit 7 as follows:

### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish mandatory signs posted at all access points of active trapping in the area. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Unit 7.

## 2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7:** “Active Trapping signs posted at all access points to operating traplines. Signs must be: 1) at least 8” x 11”, 2) brightly colored (orange or yellow), 3) waterproof/tear proof, and 4) posted at eye level clearly denoting active trapping in the area. Must include ADF&G license number or Fish & Wildlife ID number; contact information optional.”

### **What is the issue you would like the board to address and why?**

1) **ISSUE:** We are requesting the board amend 5 AAC 92.550 to establish mandatory signs posted at all access points of active trapping in the area. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Unit 7.

Posted trapping signs would alert user groups to trapping in the area and give them the opportunity to take safety precautions. Trapping signs would also alert safety personnel to added dangers if called to respond to an emergency requiring the use of Search and Rescue Dogs to find injured, lost, or buried victims. **A local Cooper Landing trapper already posts signs in a plastic bag warning of his traplines, and he supports a regulation to add “active trapping” signs indicating the presence of traplines as do several of the Cooper Landing AC members.**

Mandatory posted signs are in line with the Alaska Trappers Association Official Position Statement “Trapline Signs” that was adopted on September 27<sup>th</sup>, 2016, and states:

*“The Alaska Trappers Association encourages trappers in road-accessible regions of the State to post signs near major points of access to their personal trapline trails. These signs should explain that there are traps and/or snares on or near the trail. The signs could also include the trappers name and contact information. These signs are intended to alert other trail users of the purpose of the trail, so that they can avoid conflict with the trapper. This approach of posting signs should be beneficial for everyone involved.”*

Trapping signs would also be in alignment with the Forest Service’s Our Values Statement, which includes the intention of managing for “*Safety. In every way: physical, psychological, and social.*”

This is a low cost, low maintenance way to reduce conflicts between trappers and recreational users, and allows trapping to continue.

2) **WHY:** The community of Cooper Landing is located on the Sterling Highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper Landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, back country skiing, snowshoeing, ice fishing, trail running, and back country cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area for visitors to enjoy with their family and pets.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state.

By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and better align with current area resident's recreational use.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-010)

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**PROPOSAL 155**

**5 AAC 92.550 Areas closed to trapping.**

Close Unit 15C to beaver trapping as follows:

5 AAC 92.550 Southcentral Trapping Regulations

The following areas are closed to trapping as indicated: .....Unit 15 - Kenai Peninsula Area

- Skilak Loop Wildlife Management Area, consisting of that portion of Unit 15A bounded by a line beginning at the easternmost junction of the Sterling Highway and the Skilak Loop Road (milepost 58.0), then due south to the south bank of the Kenai River, then southerly along the south bank of the Kenai River to its confluence with Skilak Lake, then westerly along the north shore of Skilak Lake to Lower Skilak Lake Campground, then northerly along the Lower Skilak Lake Campground Road and the Skilak Loop Road to its westernmost junction with the Sterling Highway, then easterly along the Sterling Highway to the point of beginning;
- Kenai Moose Research Center Closed Area in Unit 15A, which consists of the area within the outer boundary fences of the Kenai Moose Research Center, located west and south of Coyote and Vixen Lakes.

**\*Unit 15C closed.**

**What is the issue you would like the board to address and why?** Close beaver trapping in Unit 15C.

There are very few beaver around these days on the Kenai Peninsula. Please give beavers some time to replenish themselves down here...just a few years, get the population back up. Give trappers some beaver to catch.

This is an issue bigger then beaver trapping. Beavers are engineers in rewetting and recharging ground water, essential for our diminishing salmon. They also have a huge ability to restore drying peatlands, vital for carbon sequestration and climate change mitigation. We need them.

**PROPOSED BY:** Sue Christiansen (EG-F22-132)

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**PROPOSAL 156**

**5 AAC 84.270. Furbearer trapping.**

Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years as follows:

Close all beaver trapping in the Anchor River and Deep Creek drainages in Unit 15C for two board cycles with a required sunset review.

**What is the issue you would like the board to address and why?** In recent years beavers have been nearly completely extra paid from the Anchor River and Deep Creek drainages. Given historic numbers and an abundance of suitable habitat it seems likely that with protection they may recall and ice these drainages and again offer trapping opportunities.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-067)  
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**PROPOSAL 157**

**5 AAC 84.270. Furbearer trapping.**

Shorten the beaver trapping season in Unit 7 as follows:

Beaver trapping season: Unit 7 – **Nov. 1** [Oct. 15] - April 30

**What is the issue you would like the board to address and why?** Since 2015, beaver are at least locally depleted in Unit 7. For example, along the Seward and Sterling Highways where beaver were once fairly common now they appear to be virtually absent.

Traditional Unit 7 beaver season was November 10 - March 31, generally necessitating under ice trapping which is less efficient than open water trapping. Beaver populations seemed to be fairly stable. At some point the season was extended to April 30 allowing weeks of open water opportunity. Beginning 2015, the season was again extended, this time to open October 15. Beaver abundance seemed to hold up pretty well after the season was extended to April 30 but soon became obviously depleted after the change to October 15 open.

There is also a federal subsistence hunting season for beaver in Unit 7:

BEAVER • All rural residents, 1 beaver per day, May 1 - October 10.

Beaver pelt quality improves November 1 versus October 15.

Shortening the beaver season in Unit 7 to open November 1 will continue to provide abundant harvest opportunity while giving the population a better chance to recover.

Shortening the beaver season in Unit 15 was considered. However much of Unit 15 is within the Kenai National Wildlife Refuge which already has additional beaver trapping restrictions in place. Further we are not familiar enough with Unit 15 beaver populations to ask for a shorter season.

Reducing the bag limit was also considered but presumably few trappers seal 20 beavers from Unit 7 so that probably is not a contributing factor to observed declines.

**PROPOSED BY:** Cooper Landing Fish and Game Advisory Committee (EG-F22-079)  
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**PROPOSAL 158**

**5 AAC 84.270. Furbearer trapping.**

Shorten the coyote trapping season in Units 7 and 15 as follows:

Coyote trapping season Units 7 and 15: **Nov 10** [Oct 15]- March 31

**What is the issue you would like the board to address and why?** Coyote trapping season in Units 7 and 15 opens October 15 with 3/32" or greater diameter snare cable. Most other trapping seasons in Units 7 and 15 open November 10.

Confusing regulations, bycatch and conflict with other users are all problems. Bears are more active and more likely to encounter snares prior to November 10. 3/32" snares cannot exclude wolverine and lynx. At least one dog has been trapped during the early coyote season because the owner thought the trapping season opened November 10 and so allowed the dog to run off leash. Additionally, the dog was caught in a trap, not a snare, suggesting that whoever set the trap was possibly unaware of the snare-only requirement. Finally, according to the dog owner, ADF&G stated the trapping season for coyotes was open, again apparently unaware of the snare-only requirement. While ignorance is said to not be an excuse, clearly the early coyote season has been problematic. Aligning the coyote trapping season with most other trapping seasons will help address these issues.

**PROPOSED BY:** Cooper Landing Fish and Game Advisory Committee (EG-F22-080)  
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**PROPOSAL 159**

**5 AAC 85.057. Hunting seasons and bag limits for wolverine.**

Lengthen the wolverine hunting season in Units 7 and 15 as follows:

Adjust the wolverine season to start August 10 in Units 7 and 15.

**What is the issue you would like the board to address and why?** Currently the regulations for wolverine in Units 7 and 15 starts the season on September 1st. Wolverines are primarily found in the high country feeding on Dall sheep and mountain goats. By having a later season than Dall sheep and wolves, this means many hunters miss an opportunity to help manage these predators. If wolverines are harvested for their fur just like wolves and bears, why can a hunter harvest wolves and bears in August during sheep season, but not wolverine. The Dall sheep in the Kenai Mountains are on a steady decline while predators continue to grow.

**PROPOSED BY:** Caleb Martin (EG-F22-133)  
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**PROPOSAL 160**

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

Limit beaver trapping to one set per lodge for Units 7 and 15, and require visual markers as follows:

Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice. This regulation has been successful in the Kenai National Wildlife Refuge.

**What is the issue you would like the board to address and why?** Trapping appears to be a major factor in the extirpation of beavers in many areas of the Kenai Peninsula. Multiple trappers in one area can contribute to overharvest of beaver lodges.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-068)

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**PROPOSAL 161**

Direct ADF&G to conduct a feasibility study for transporting Sitka Blacktail deer to Unit 15C, south side of Kachemak Bay as follows:

Direct the Department of Fish and Game to conduct its scoping report, feasibility assessment, and biological and social risk analyses, which would precede department and public review before a potential formal ADF&G plan regarding transplanting and growing a population of Sitka Blacktail deer to the south side of Kachemak Bay in Unit 15C. Reference "Game Transplants in Alaska, Technical Bulletin #4 second edition by Thomas Paul, ADFG, 2009" or a later edition.

**What is the issue you would like the board to address and why?** Increase opportunity for hunting, food security, local economy, and wildlife viewing in Unit 15c.

The south side of Kachemak Bay would be a productive area to explore the idea of transplanting deer. The area is ecologically quite different than the Homer side and provides very similar habitat, browse, and other fauna to Prince William Sound, northern Southeast Alaska, and much of the Kodiak archipelago; all locations of successful past ADF&G transplant operations which now provide opportunity for all.

It is understood that this is the purview of the ADF&G Commissioner; we do not believe the Board of Game (board) has the authority to enact transplants. By submitting this as a board proposal, we are aiming only to begin a dialogue, allowing everyone who follows wildlife issues: public, private, agency staff, and administrators, to begin thinking about its viability if and when it pleases this or a future Administration.

**PROPOSED BY:** The Homer Fish and Game Advisory Committee (EG-F22-029)

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**PROPOSAL 162**

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

Extend the ptarmigan season in a portion of Unit 15C to March 31 as follows:

I propose leaving the bag limit at five and ten in possession with the hunt dates increased back to original that were August 10th - March 31st. The spring hatch has been good, and the numbers are high.

**What is the issue you would like the board to address and why?** Change back to original dates August 10th - March 31st for ptarmigan in Unit 15C, that portion north of Kachemak Bay and north of Fox River, leaving the bag limit of five and ten in possession as it is now.

**PROPOSED BY:** Rollin Braden (EG-F22-027)

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**PROPOSAL 163**

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

Rescind the bag limit restrictions for sea duck hunting in Unit 15C as follows:

In effect, eliminate special sea duck restrictions for Unit 15C, restoring seasons and bag limits applicable to the entire Gulf Coast Zone – Units 5-7, 9, 10 (Unimak Is. only) and Units 14-16.

**5 AAC 85.065. Hunting seasons and bag limits for small game. (a)**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
Migratory game birds (except by falconry) <sup>1</sup>		
...		
(B) Sea Ducks (except Spectacled and Steller's eiders) <sup>3</sup>		
...		
Units 5 - 7, 9, 10 (Unimak Is. only), and Units 14 - 16		
RESIDENT HUNTERS: 10 per day, 20 in possession, of which no more than 6 each per day, 12 in	Sept. 1-Dec. 16 (General hunt only)	

possession may be harlequin ducks and no more than 6 per day, 12 in possession may be long-tailed ducks.

NONRESIDENT HUNTERS:

8 per day, 20 in possession; however, no more than 4 each of any sea duck species may be taken per season; and no more than 20 sea ducks of all species may be taken per season

Sept. 1-Dec. 16

[UNIT 15C, THAT PORTION IN KACHEMAK BAY EAST OF A LINE FROM POINT POGIBSHI TO ANCHOR POINT

RESIDENT HUNTERS:

SEPT. 1-DEC. 16]

10 PER DAY, 20 IN (GENERAL HUNT ONLY) POSSESSION, OF WHICH NO MORE THAN 2 PER DAY, 4 IN POSSESSION MAY BE LONG-TAILED DUCKS AND NO MORE THAN 1 PER DAY, 2 IN POSSESSION MAY BE AN EIDER]

[NONRESIDENT HUNTERS:

8 PER DAY, 20 IN POSSESSION; OF WHICH NO MORE THAN 2 PER DAY, 4 IN POSSESSION MAY BE HARLEQUIN DUCKS, NO MORE THAN 2 PER DAY, 4 IN POSSESSION MAY BE LONG-TAILED DUCKS, AND NO MORE THAN 1 PER DAY, 2 IN POSSESSION MAY BE AN EIDER; HOWEVER, NO MORE THAN 4 EACH OF ANY SEA DUCK SPECIES MAY BE TAKEN PER SEASON; AND NO MORE THAN 20 SEA DUCKS OF ALL SPECIES MAY BE TAKEN PER SEASON]

Sept. 1-Dec. 16

...

**What is the issue you would like the board to address and why?** Rescind bag limit restrictions for sea duck hunting in Unit 15C adopted by the Board of Game in 2010. The reductions in bag limits for eiders, harlequin ducks and long-tailed ducks were not based on best available scientific data nor were they consistent with management guidelines by ADF&G, Pacific Flyway Council or U.S. Fish and Wildlife Service to address necessary conservation needs.

There is no documented biological problem indicating low population levels or substantial declines for eiders, harlequin ducks or long-tailed ducks (nor for buffleheads or goldeneyes that are the subject of current discussions by local supporters of restrictions). There is no evidence that changes in sea duck abundance are caused by harvest.

There are no documented indications that sea duck harvests in Alaska are excessive in relation to duck population levels or increasing to the point of concern. Harvest assessment needs to be examined from a flyway-wide or large region perspective that is consistent with defined species populations that can be feasibly monitored—not from anecdotal or biased claims about small-scale effects.

It is critical that sea duck regulation decisions be framed at the appropriate scale and continue the biologically sound regime of population and harvest assessments for populations that seasonally migrate thousands of miles across thousands of square miles of breeding and wintering habitat. The numbers of birds that occupy individual bays and coves at any given time is highly variable in response to many conditions and is not relevant to the status of entire species populations at regional or flyway levels.

**PROPOSED BY:** Alaska Waterfowl Association (EG-F22-101)  
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**PROPOSAL 164**

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

Reduce the bag limit for goldeneye in Units 7 and 15 as follows:

Bag limit for Goldeneye: 4/day, 8 in possession.

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends, we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-058)  
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**PROPOSAL 165**

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

Reduce the bag limit for goldeneye in Unit 15C as follows:

4 Goldeneye per day, 8 in possession.

**What is the issue you would like the board to address and why?** A bag limit reduction on goldeneye is needed to ensure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted the same proposal. I am submitting this to add supporting information.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest place to access sea ducks in Alaska. Since goldeneye prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of Sea Ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

For the most part sea ducks are targeted for trophies—this proposal is designed to allow for trophies, meat harvest, incidental take, and traditional tribal harvest.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s, and according to ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”

Bag limits for migratory waterfowl are set on the level of the Pacific Flyway, but Alaska can set more restrictive limits, as happened when the Board of Game set special bag limit restrictions on eiders, harlequin, and long-tailed ducks in Kachemak Bay in 1999.

**PROPOSED BY:** Penelope Haas (EG-F22-093)

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**PROPOSAL 166**

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

Reduce the bag limit for bufflehead in Units 7 and 15 as follows:

Bufflehead: 4/day, 8 in possession.

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-060)

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**PROPOSAL 167**

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

Reduce the bag limit for bufflehead in Unit 15C as follows:

4 Bufflehead per day, 8 in possession.

**What is the issue you would like the board to address and why?** A bag limit reduction on bufflehead is needed to ensure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted the same proposal. I am submitting this to add supporting information.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest place to access sea ducks in Alaska. Since bufflehead prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of sea ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

For the most part sea ducks are targeted for trophies—this proposal is designed to allow for trophies, meat harvest, incidental take, and traditional tribal harvest.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s’, and according to

ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”

Bag limits for migratory waterfowl are set on the level of the Pacific Flyway, but Alaska can set more restrictive limits, as happened when the Board of Game set special bag limit restrictions on eiders, harlequin, and Long-tailed ducks in Kachemak Bay in 1999.

**PROPOSED BY:** Penelope Haas (EG-F22-095)

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**PROPOSAL 168**

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

Reduce the bag limit for harlequin duck for Units 7 and 15 as follows:

Harlequin duck: 1/day, 2 in possession

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15 it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-061)

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**PROPOSAL 169**

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

Reduce the bag limit for harlequin in Unit 15C as follows:

1 Harlequin per day, 2 in possession.

**What is the issue you would like the board to address and why?** A bag limit reduction on harlequin is needed to ensure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted the same proposal. I am submitting this to add supporting information.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest place to access sea ducks in Alaska. Since harlequin prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree

of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of sea ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

For the most part sea ducks are targeted for trophies—this proposal is designed to allow for trophies, meat harvest, incidental take, and traditional tribal harvest.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s, and according to ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”

Bag limits for migratory waterfowl are set on the level of the Pacific Flyway, but Alaska can set more restrictive limits, as happened when the Board of Game set special bag limit restrictions on eiders, harlequin, and Long-tailed ducks in Kachemak Bay in 1999.

**PROPOSED BY:** Penelope Haas (EG-F22-094)  
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**PROPOSAL 170**

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

Reduce the bag limit for long-tailed duck in Units 7 and 15 as follows:

Long-tailed duck: 1/day, 2 in possession.

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15 it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-062)  
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**PROPOSAL 171**

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6, 7 and 15 as follows:

Direct the Department of Fish and Game to institute means and methods to record sea duck harvest as accurately as possible.

**What is the issue you would like the board to address and why?** Given that there is nearly no current data on sea duck harvest and that there is growing concern about population trends hunter harvest data should be collected.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-057)

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**PROPOSAL 172**

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Require mandatory harvest reporting for sea ducks in Kachemack Bay in Unit 15C as follows:

I propose mandatory harvest reporting for sea ducks in Kachemak Bay.

Regulatory language could be modeled on regulations in the State of Washington, which reads:

“To improve management of certain limited migratory bird species, you are required to possess a Migratory Bird Authorization and Harvest Record Card(s) if you are hunting those species (see page 10). Immediately after taking a band-tailed pigeon, brant, sea duck (scoters, long-tailed duck, harlequin, goldeneyes) in western Washington, snow goose (Goose Management Area 1) or any goose in Goose Management Area 2 — Coast & Inland into possession, you must fill out the required harvest record card information in ink. You must report hunting activity on your harvest record cards to WDFW using the online reporting system at: [fishhunt.dfw.wa.gov/](http://fishhunt.dfw.wa.gov/), or by mailing the cards to: WDFW, Wildlife Program — Waterfowl Section, PO Box 43141 Olympia, WA 98504. Reports need to be postmarked by the reporting deadlines even if you did not harvest any birds. Please note that you must comply with these reporting requirements or you will be required to pay a \$10 administrative fee before obtaining a harvest record card the next year.”

**What is the issue you would like the board to address and why?** Accurate sea duck harvest numbers in Kachemak Bay are needed to assure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted a similar proposal. I am submitting this to add supporting information.

The current reporting system, Alaska’s Migratory Bird Harvest Information Program (HIP), does not give us enough information and puts us in danger of over-harvest. HIP invites voluntary reporting from a very small, randomized group of hunters from across the state: it gives a just a little information on a statewide level and does not consider regional variations.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest places to access sea ducks in Alaska. Since bufflehead prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower

reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of sea ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s, and according to ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of indigenous fish and wildlife populations.”

**PROPOSED BY:** Penelope Haas

(EG-F22-096)

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# **Antlerless Moose & Brown Bear Tag Fee Reauthorizations for Other Regions**

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## **PROPOSAL 173**

### **5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only in Unit 13(A); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or	Oct. 1–Oct. 31 Mar. 1–Mar. 31 (General hunt only)	No open season
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

This Unit 13 antlerless hunt was initially adopted in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. The hunt was modified when the Board of Game adopted an October and March season during the February 2013 board meeting.

Since the establishment of this hunt, the department has issued 10 permits annually in Unit 13A. The department intentionally limited the number of permits issued annually to gain public support for the hunt, even though a higher rate of cow harvest was desirable to regulate the moose population within objectives. After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to one percent of the cow population, when the moose population is above the midpoint of the population objective for the subunit. Twenty permits were issued for regulatory year (RY) 2020 and 25 permits were issued for RY21.

The current population objective for Unit 13A is 3,500–4,200, and the population was estimated to be above objective in 2015 and 2016, within the higher end of the objectives in 2017–2020. In

2021 the 13A moose population was estimated to be above the objectives, and the 3-year average remains just within the higher end of the objectives. The antlerless hunt in western Unit 13A contributes to maintaining the moose population within the intensive management objectives. The additional harvest provided through this hunt will also assist in achieving the harvest objectives for the population.

If antlerless moose hunting opportunities are not reauthorized in Unit 13A, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-053)  
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**PROPOSAL 174**

**5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13C as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only in Unit 13(C); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or	Oct. 1–Oct. 31 (General hunt only)	No open season
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. This hunt was established during the January 2022 board meeting and as a result has not yet been held. The earliest the hunt can occur is in October of 2023, and the number of permits to be issued has not yet been determined. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

Unit 13 has an active intensive management program, designed to increase moose abundance to

within objectives, and increase available harvest for humans. The program has included a predation control component that began in 2004. Since the early 2000s, moose abundance in most subunits has increased until recent years when many subunits have peaked and/or stabilized at, above, or within abundance objectives.

As moose populations approach carrying capacity, the population becomes less productive, and may eventually decline. Stabilizing a population below carrying capacity allows it to remain highly productive if additional moose are removed annually. This requires harvest of both cows and bulls. The intensive management abundance objectives for moose in Unit 13 are designed to maintain moose populations in Unit 13 subunits below carrying capacity, at a more productive level. Unit 13C has reached abundance levels for which cow harvest is necessary to stabilize the population at a more productive level and allow for human harvest of excess moose. In recent years the bull-to-cow ratio in Unit 13C averages just below the objective of 25 bulls per 100 cows, suggesting that there are not additional bulls available for harvest currently. Harvest of up to 1% of the estimated cow moose population in 13C would allow for roughly 23 cow moose to be harvested annually in recent years.

Harvest objectives for 13C are 155–350 moose, but those objectives have not been met since 1995, when 154 moose were harvested, and 1996, when 169 moose were harvested. The only other years when harvest exceeded 150 moose was in 1989 (154 harvested), and 1988 (199 harvested), which was the most moose ever reported harvested in a single year in 13C. As moose abundance in 13C increased above objectives in recent years, harvest peaked at 117 moose in 2014. Evidence suggests that the current moose harvest objectives for 13C may not be attainable due primarily to accessibility. Harvest of excess cow moose to stabilize the 13C population will increase overall harvest and provide additional opportunity for hunters to harvest cows as well as additional bulls.

If antlerless moose hunting opportunities are not reauthorized in Unit 13C, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-052)  
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**PROPOSAL 175**

**5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year,		

only as follows:

...

1 antlerless moose by drawing permit only in Unit 13(E); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or

Oct. 1–Oct. 31  
(General hunt only)

No open season

...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. This hunt was established during the January 2022 board meeting and as a result has not yet been held. The earliest the hunt can occur is in October of 2023, and the number of permits to be issued has not yet been determined. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

Unit 13 has an active intensive management program, designed to increase moose abundance to within objectives, and increase available harvest for humans. The program has included a predator control component that began in 2004. Since the early 2000s, moose abundance in most subunits has increased until recent years when many subunits have peaked and/or stabilized at, above, or within abundance objectives. As moose populations approach carrying capacity, the population becomes less productive, and may eventually decline. Stabilizing a population below carrying capacity allows it to remain highly productive if additional moose are removed annually. This requires harvest of both cows and bulls. The intensive management abundance objectives for moose in Unit 13 are designed to maintain moose populations in Unit 13 subunits below carrying capacity, at a more productive level. Unit 13E has reached abundance levels for which cow harvest is necessary to stabilize the population at a more productive level and allow for human harvest of excess moose.

The moose abundance index indicated fewer than 4,000 moose in Unit 13E in 2000 but the population has been increasing since then and the current abundance is well above the abundance objectives of 5,000 to 6,000 moose. Harvest levels increased with the increase in abundance, but harvest levels remain below the harvest objectives of 300 to 600 moose. Bull-to-cow ratios are at the objective of 25 bulls to 100 cows. Additional harvest has been requested by the public for Unit 13E but cannot be obtained without harvesting some cows. Cow moose harvest opportunity will provide for the reduction of moose abundance to within objectives before the population becomes nutritionally stressed and experiences a decline due to nutritional constraints. Furthermore, harvest of cows will allow for additional bull harvest without compromising bull-to-cow ratios, and populations under sustained-yield management are more productive with both bull and cow harvest.

If antlerless moose hunting opportunities are not reauthorized in Unit 13E, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

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**PROPOSAL 176**

**5 AAC 84.045(a)(12). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose draw permits in Units 14A and 14B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
Unit 14(A)		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 2,000 antlerless moose permits may be issued; or	Aug. 20–Sept. 25 (General hunt only) Nov. 1–Dec. 25 (General hunt only)	No open season
1 moose by targeted permit only; by crossbow, shotgun or bow and arrow only; up to 200 permits may be issued	Winter season to be announced (General hunt only)	No open season
Unit 14(B)		
1 moose per regulatory year, only as follows:		
...		
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued.	Winter season to be announced (General hunt only)	No open season

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. There are two types of antlerless moose hunts in the Matanuska-Susitna Valley – a drawing permit hunt used to regulate growth of the moose

population in Unit 14A, and targeted hunts used to mitigate public safety concerns in Units 14A and 14B.

Moose surveys conducted in November 2020 yielded an estimate of 7,112 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2019 survey estimate of 7,900 moose indicating that the increased antlerless harvests are having the desired effect of reducing the population. A sex and age composition of the 2020 survey demonstrated a bull ratio of 30 bulls:100 cows and a calf ratio of 36 calves:100 cows.

Antlerless moose hunts have been authorized in Unit 14A since 2001 in order to regulate the growth of the population. The permit level was increased from 450 to 1,000 in 2013 to account for the continued increase in the population and again in spring 2018 from 1,000 to 2,000. Continued increased harvest based on the increased permit levels is expected to bring the population back to within the objective for the unit of 6,000–6,500.

The current increases in the harvest have seemingly slowed the population growth; however, it has not reduced the moose population to within objectives. An increase the number of moose-human conflicts is anticipated as the moose density increases, and moose may experience nutritional stress as the population nears carrying capacity. Cow harvests are warranted to control the moose population’s growth and recommended to provide additional moose hunting opportunity in the Matanuska-Susitna Valley.

The targeted moose hunts in Units 14A and 14B are an effective tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 338 moose per year were killed in the Matanuska-Susitna Valley area during the last five years of average snowfall and substantially more are killed during higher snowfall years. ADF&G also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-047)  
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**PROPOSAL 177**

**5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(15)

Unit 17(A)

Up to 2 moose per regulatory year only as follows:

**RESIDENT HUNTERS:**

1 moose by registration permit only; or Aug. 25–Sept. 25 (Subsistence hunt only)

1 antlered bull by registration permit only; or Jan. 1 – Last day of Feb. (Subsistence hunt only)

1 antlerless moose by registration permit only; Jan. 1 – Last day of Feb. (Subsistence hunt only)

...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The board adopted an antlerless moose hunt in 2013 after hearing many comments from heavily invested groups such as the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, and the Togiak National Wildlife Refuge.

The Unit 17A moose management plan calls for antlerless moose hunting opportunity when the population is above 600 moose and increasing. When the population exceeds 1,200 moose, a bag limit of up to two moose is needed to provide increased opportunity and to reduce moose abundance to protect habitat. Based on the most recent survey with good conditions in March 2017, there is a population estimate of 1,990 +437 moose. The bag limit of two moose and antlerless harvest opportunity provide a mechanism to limit population growth and allow hunters to harvest surplus animals.

The moose population in subunit 17A is growing and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-050)  
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**PROPOSAL 178**

**5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.**

Reauthorize the resident antlerless moose season in Unit 18 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(16)

...

Unit 18, that portion that drains into Kuskokwim Bay south of the Carter Bay drainage

RESIDENT HUNTERS:

...

1 moose by registration Permit only; to be announced by emergency order	Dec. 1—Mar. 31 (Season to be announced)	No open season.
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Remainder of Unit 18

RESIDENT HUNTERS:

2 moose; of which only 1 may be an antlered bull; a person may not take a calf or a cow accompanied by a calf; or	Aug. 1—Sept. 30
2 antlerless moose; or	Oct. 1—Nov. 30.
2 moose	Dec. 1—April 30.

NONRESIDENT HUNTERS:

...

1 antlerless moose	Dec. 1—Mar. 15
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...

**What is the issue you would like the board to address and why?** To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually. The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014 Board of Game meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area, and the nonresident antlerless hunt, were both adopted at the January 2017 Board of Game meeting in Bethel. The board has previously reauthorized the antlerless moose season for resident hunts in Unit 18 Remainder for regulatory year (RY) 2016 through RY2021. This proposal requests reauthorization of all antlerless hunts for RY2023.

Implementation of antlerless hunts began in 2006 and has continued each year due to increased moose abundance and continued high reproductive rates along the Yukon River drainage in Unit 18. Based on the steady growth in moose abundance, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated at a minimum of 23,000 animals with calf:cow ratios ranging from 36:100 to 61:100, and twinning rates from 18% to 36% for all areas. Population growth continues in this portion of Unit 18 and anecdotal evidence suggests that calf survival rates were high for the winter of 2021-2022. The population is expected to continue to grow with high recruitment and adult survival.

Although the current year harvest data in the Remainder of Unit 18 has not been finalized due to the early proposal deadline, harvest is expected to be similar to the past four years and well within sustained yield for this robust population. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18.

The moose population in the Goodnews River drainage had grown steadily in the past 15 years following a closure in 2004. The fall hunt has had a quota of 10 moose in the first few years of the hunt and recently increased to 30. The season has not been closed by emergency order and the past few years the quota was not met. In the two years that the winter hunt has been held, harvest has been low (only five moose harvested in RY2017 and none in RY2018). The population now is over 400 moose and based on the steady growth in moose abundance, ADF&G proposes continued antlerless moose hunts in the Goodnews River Drainage.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-039)  
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**PROPOSAL 179**

**5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during February in a portion of Unit 19D as follows.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(17)

...

Unit 19(D), that portion upstream of the Selatna River, excluding the Black River

1 moose, by registration permit only, a person may not take a cow accompanied by a calf

Feb 1 – Last day of Feb.

No open season.

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The moose population in Unit 19D East has approximately doubled since predator removals began in 2003. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. By 2020 ratios had declined again and the two-year average was 17 bulls per 100 cows.

To maintain a healthy and productive moose population, department research (Boertje et al. 2007) indicates that when the 2-year average twinning rate is 11–20% populations should be stabilized. Twinning rates in Unit 19D East remained high until 2015 (30-40%); however, the current 2-year average twinning rate is now 19%, indicating a lower nutritional status in this population. The current Intensive Management plan for Unit 19D East calls for stabilization of the population through harvest when the 2-year average twinning rate is between 15 and 20%.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-046)

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**PROPOSAL 180**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
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(18)

Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Oct. 1–Feb. 28

...

1 moose by targeted permit only; by crossbow shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts are important for maintaining the moose population at levels that the habitat can support. Antlerless hunts also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Subsistence hunters in the portion of Unit 20A outside the Fairbanks nonsubsistence area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

Reauthorizing antlerless moose hunts will allow hunting opportunity and harvest to increase and allow the Department of Fish and Game to manage the moose populations at an optimum level. The additional harvest will help in meeting IM harvest objectives without reducing bull-to-cow ratios. Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at a level compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The current objective is to maintain moose numbers within the IM population objective of 10,000–15,000 moose, while monitoring indicators of moose and habitat condition for positive density-dependent responses. The Unit 20A population was estimated at between 12,100–15,900 moose (90% confidence interval) in November 2021. There is an estimated 5,040 mi<sup>2</sup> of moose habitat in Unit 20A which equates to a moose density of between 2.4 and 3.2 moose/mi<sup>2</sup>. The median of this estimate falls within the IM population objective but at the upper end. The department does not want the population to further increase because of concerns about density effects such as twinning rates below 20% and short-yearling weights below 400 pounds, both of which indicate a nutritionally stressed population. The department will continue to monitor Unit 20A twinning rates and short yearling weights and may recommend fewer antlerless hunts in the

future if these two thresholds are surpassed. However, at the current density of moose the intention is to harvest moose at a rate of 1% of the population which has been shown to stabilize the moose population at its current level. Antlerless harvest will be by drawing permits for a majority of Unit 20A and a registration permit outside the Fairbanks nonsubsistence area in northwest Unit 20A near Nenana. The harvest objective will be based on the most recent survey results. The three-year average antlerless moose harvest in Unit 20A is 80 moose. The department did not issue antlerless moose permits in 2022 because of a severe 2021/2022 winter and the anticipated high mortality. The department will evaluate overwinter survival and other factors throughout 2022 and early winter 2023 to determine if and how many antlerless permits will be issued in fall 2023.

The number of moose in Unit 20A was estimated at 17,768 (3.5 moose/mi<sup>2</sup>) in 2003. Research indicated this high-density moose population was experiencing density-dependent effects, including low productivity, relatively light calf weights, and high removal rates of winter forage. The objective beginning in regulatory year 2004–2005 (RY04) was to reduce moose numbers to the population objective of 10,000–12,000 moose (1.5–1.8 moose/mi<sup>2</sup>) unless indicators of moose condition showed signs of improvement at higher densities. In 2016, the Board of Game adopted the IM population objective of 10,000–15,000 moose and the 2021 population estimate is within the IM objective.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-045)  
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**PROPOSAL 181**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
(18)		
...		
Unit 20(B), that portion within Creamer’s Refuge		
...		
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27 (General hunt only)	Sept. 1–Nov. 27

<p>1 antlerless moose by muzzle-loader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area</p>	<p>Dec. 1–Jan. 31 (General hunt only)</p>	<p>Dec. 1–Jan. 31</p>
<p>Unit 20(B), remainder of the Fairbanks Management Area</p>		
<p>...</p>		
<p>1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or</p>	<p>Sept. 1–Nov. 27 (General hunt only)</p>	<p>Sept. 1–Nov. 27</p>
<p>1 moose by targeted permit only; up to 100 permits may be issued</p>	<p>Season to be announced by emergency order (General hunt only)</p>	<p>No open season.</p>
<p>Unit 20(B), that portion within the Minto Flats Management Area</p>		
<p>RESIDENT HUNTERS:</p>		
<p>...</p>		
<p>1 antlerless moose by registration permit only</p>	<p>Oct. 15–Feb. 28 (Subsistence hunt only)</p>	<p>No open season.</p>
<p>...</p>		
<p>Unit 20(B), the drainage of the Middle Fork of the Chena River</p>		
<p>1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or</p>	<p>Aug. 15–Nov. 15 (General hunt only)</p>	

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb. (General hunt only)	No open season.
...		
Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway		
...		
1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Last day of Feb. (General hunt only)	No open season.
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
Remainder of Unit 20(B)		
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14 (General hunt only)	No open season
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order (General hunt only)	No open season.
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population may exceed population objectives causing habitat degradation and a loss of opportunity to hunt a surplus of antlerless moose. Furthermore, subsistence hunters in the portion of Unit 20B in the Minto Flats Management Area may not have a reasonable opportunity to pursue moose for subsistence uses.

The reauthorization of antlerless moose hunts in Unit 20B will allow the Alaska Department of Fish and Game (ADF&G) to manage the moose population within the population objectives of 12,000 to 15,000 moose. Hunting opportunity and harvest will increase and allow ADF&G to manage this moose population at optimum levels. The additional harvest is necessary to meet intensive management harvest objectives while maintaining bull-to-cow ratios within objectives. Subsistence hunters will have reasonable opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at levels compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The moose population level in Unit 20B is currently within the population objective of 12,000–15,000 moose. The population declined from an estimated 20,173 moose in 2009 to 11,064 in 2015, due in large part to antlerless moose hunts designed to lower the population to those objectives. The population increased slightly to 12,871 moose in 2017 and was estimated at 12,479 in 2020. To maintain the current population level the department recommends limited antlerless hunts in the Minto Flats Management Area (MFMA) and the Fairbanks Management Area (FMA). The department will continue to monitor the moose population and may implement additional antlerless hunts if the population continues to trend upward.

*Fairbanks Management Area (FMA)*—The purpose of this antlerless hunt is to regulate population growth in the FMA and reduce potential moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA is high and they pose significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest and reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during RY99–RY10. Moose–vehicle collisions and moose nuisance problems have remained lower since, presumably, in part due to consistent antlerless moose harvests.

*Minto Flats Management Area (MFMA)*—The primary purpose of this antlerless hunt is to provide a reasonable opportunity for subsistence uses and to regulate the moose population in the MFMA.

The MFMA moose density was high in 2010 (4.4 moose/mi<sup>2</sup>). To reduce the moose population, the harvest of antlerless moose during RY12 and RY13 was about 2.5% of the population. The fall 2015, 2017, and 2019 estimates showed more appropriate densities of 1.6, 1.7, and 2.0

moose/mi<sup>2</sup>, respectively. Because the population level has been stable and within the population objectives, the antlerless harvest has been reduced to approximately 1% of the total population to maintain the current population level.

*Targeted Hunt*—The purpose of the targeted hunt is to allow the public to harvest moose that are causing nuisance or public safety issues. These permits are used sparingly but allow the public to harvest the moose instead of the department just dispatching them.

Due to severe winter weather and anticipated high levels of natural mortality, the department did not issue antlerless moose drawing permits for certain hunts within Unit 20B for fall of 2022, and does not intend to hold the fall antlerless registration hunt in the MFMA. Reauthorization of these antlerless hunts is needed to retain the management options, as described for each hunt, to maintain appropriate moose abundance levels. The department will evaluate overwinter survival in the area along with other factors throughout 2022 and early winter 2023 to determine if and how many antlerless permits will be issued in Fall 2023.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-044)  
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**PROPOSAL 182**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(18)

...

Unit 20(D), that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River, except the Delta Junction Management Area and the Bison Range **Controlled Use Area** [YOUTH HUNT MANAGEMENT AREA]

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion in the Delta Junction Management Area; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25  
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10–Nov. 25  
(General hunt only)

...

Unit 20(D), that portion within the Bison Range Controlled Use Area

...

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf;

Sept. 1–Sept. 30  
(General hunt only)

Sept. 1–Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15  
(General hunt only)

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25  
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10–Nov. 25  
(General hunt only)

NONRESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15

...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually. The objectives of the Unit 20D antlerless moose hunts are to 1) stabilize population growth of this high-density moose population; 2) address concerns about range degradation, reduced nutritional condition, and reduced reproductive success; 3) make progress toward meeting the Unit 20D intensive management (IM) harvest objective of 500–700 moose; and 4) provide youth and disabled veteran hunting opportunity.

If antlerless moose hunts are not reauthorized, the moose population could quickly increase to levels beyond the ability of the habitat to support the moose population. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Additionally, the population may need to be reduced dramatically if populations increase substantially.

Antlerless moose hunts have been conducted in southwest Unit 20D, which has the highest moose density in the unit. This area has demonstrated population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 30 years. Total moose harvest in all of Unit 20D averaged 270 moose (an average of 252 bulls and 18 antlerless moose) during regulatory years 2018 and 2019.

Antlerless hunting opportunity is limited at present because this opportunity helps to maintain the moose population within the ability of habitat to support the population. The 2020 population estimate for southwest Unit 20D was 3,399 moose (corrected for sightability) with a density of 3.3 moose per square mile, 32 calves:100 cows and 23 bulls:100 cows. The population has been relatively stable for a decade. Bull:cow ratios have been below 30:100 for the past 5 years, and twinning rates are among the lowest observed in the state (<10%).

Continued antlerless harvest will likely be needed to maintain the population at the optimal density and will help make progress toward the IM harvest objective of 500–700 moose without reducing bull-to-cow ratios below the management objectives. The population trend and harvest rate suggest the low, consistent antlerless harvest provided by the drawing permit hunts in Unit 20D, in conjunction with other mortality factors, is an appropriate rate of antlerless moose mortality that contributes to stability in the southwest Unit 20D moose population. The department did not issue antlerless moose drawing permits in southwest 20D for the fall of 2022 due to the severity of the 2021/2022 winter and the anticipated increase in natural mortality. The department will evaluate browse removal, twinning rates and abundance and other factors throughout 2022 and early winter 2023 to determine if and how many antlerless permits will be issued in fall 2023.

The department will continue to evaluate antlerless moose hunts and their effect on moose density and population growth while monitoring indices of density-dependent moose nutritional conditions in relation to changes in moose density, including proportional removal of current annual growth of winter browse, proportion of females with twin calves, and late-winter calf weights.

Additional drawing or registration permits will be issued only if more harvest is needed in specific areas to maintain optimal moose densities.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-043)  
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**PROPOSAL 183**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(18)		
...		
Unit 20(E), the remainder of of the Ladue River Controlled Use Area		
<b>RESIDENT HUNTERS</b>		
...		
1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing	Aug. 5–Sept. 5 (General hunt only) Oct. 15–Nov. 30 (General hunt only)	

hunt; a person may not take a cow accompanied by a calf; or

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15–Nov. 30  
(General hunt only)

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

Unit 20(E), that portion outside of the Ladue River Controlled Use draining into the Ladue River upstream of the South Fork of the Ladue River, the Dennison Fork of the Fortymile River, and the Mosquito Fork of the Fortymile River drainage.

RESIDENT HUNTERS

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or

Aug. 5–Sept. 5  
(General hunt only)  
Oct. 15–Nov. 30  
(General hunt only)

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15–Nov. 30  
(General hunt only)

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The Unit 20E antlerless moose hunts were originally passed by the Board of Game in March 2022, and the primary objectives of the hunts are: 1) slow population growth to avoid habitat damage, 2) help achieve Intensive Management (IM) harvest objectives, and 3) provide the management flexibility to rapidly respond to changes in nutrition.

The moose population within a portion of southern Unit 20E has shown consistent growth since 2005 and has approximately doubled since then, with the cow component of the population growing at a significantly faster rate than the bull component of the population. Moose densities within a 1,821 mi<sup>2</sup> area along the Taylor Highway in southern Unit 20E increased from 0.68 moose/mi<sup>2</sup> in 2005 to 1.36 moose/mi<sup>2</sup> in 2020, with an estimated annual growth rate of 4.9%. The cow segment of the population grew at an estimated 5.8% per year while the bull segment of the population, which is limited by higher natural mortality and harvest, grew at half the rate. Slowing the population growth rate in order to avoid habitat damage is largely dependent on the ability to control the growth of the female component of the population.

Antlerless harvest will help achieve IM harvest objectives without reducing bull:cow ratios below management objectives. The Unit 20E IM harvest objective is 250–450 moose, and the RY17–RY21 annual average unit-wide reported harvest was 209 moose. Unless nutritional indices decline, the department’s general goal is to harvest 1% or less of the moose population within the antlerless hunt area, which equates to approximately 30 or less moose. This level of harvest would contribute substantially to meeting IM harvest objectives.

Moose nutritional levels are currently healthy in Unit 20E, and the antlerless harvest framework provides management flexibility to rapidly respond to potential future changes in nutrition. Twinning rates are currently 39% (2018-2021 3-year weighted average), and the department closely monitors these rates given the potential for them to lag as a reflection of population-level nutritional condition. The antlerless harvest framework not only provides the ability for the department to rapidly respond to potential future changes in twinning rates (or other nutritional indices), but it also provides the ability to proactively reduce population growth rates in order to maintain the current high nutritional levels.

If the Unit 20E antlerless moose hunts are not reauthorized, and the population growth rates from the last 15 years continue, the ability to stabilize or reduce the population in the future might be inhibited by logistical and social issues. For example, although portions of the area are road

accessible, large portions are more remote, and there are logistical challenges to distributing harvest (especially higher levels of harvest) throughout the area. Furthermore, if past growth rates continue unabated and nutritional condition declines, social challenges could occur if more rapid and severe management action (e.g., high number of hunters) was necessary.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-042)  
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**PROPOSAL 184**

**5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during March in a portion of Unit 21D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<p>(19)</p> <p>Unit 21(D), that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek</p> <p>RESIDENT HUNTERS:</p> <p>...</p> <p>1 moose, by registration permit only, up to 15 days during March; a person may not take a cow accompanied by a calf</p> <p>...</p>	<p>(Winter season to be announced)</p>	

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose recently emerged because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost, and our ability to meet Intensive Management (IM) harvest objectives could be reduced. In addition, rather than allow the population to go through dramatic rates of expansion and contraction, it is prudent to dampen the current accelerating rate of increase.

The Intensive Management (IM) harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2012–2021 was 401 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not met the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make

progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. Subsistence hunters will benefit from the opportunity to harvest cow moose.

Analysis of three Trend Count Areas (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough TCAs) within the Kaiyuh Flats in this hunt area increased in moose abundance among all age classes, and adult moose abundance was 32% above the 18-year average by 2021. Geospatial Population Estimate data also increased from 1,897 ( $\pm 11\%$ ) moose in 2011 to 4,116 ( $\pm 10\%$ ) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates between 2004 and 2021 (avg. = 36%), although the 5-year twinning rate average (2017-2021) was 29%.

The portion of 21D affected by this reauthorization is approximately 21% (2,559 mi<sup>2</sup>) of Unit 21D (12,093.6 mi<sup>2</sup>). Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the total moose estimated in Unit 21D at 10,478 moose ( $\pm 1,572$ ) in 2021. The mid-point for the total 21D moose population estimate was above the IM population objective for all of Unit 21D (12,093.6 mi<sup>2</sup>) of 9,000–10,000 moose.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-041)  
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**PROPOSAL 185**

**5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during part of February and March in Unit 21E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(19)		
...		
Unit 21(E)		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, a person may not take a cow accompanied by a calf	Feb 15 – Mar 15	
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

This moose population is beginning to show signs of nutritional stress. The most current survey in 2019 indicated there are 9,777 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000–11,000 moose. There is currently a harvestable surplus of 390 moose; approximately 200 moose are harvested each year and there are additional moose available to harvest. Bull-to-cow ratios are high, with 42 bulls per 100 cows in 2018. The Intensive Management (IM) harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 2.1 moose/mi<sup>2</sup> in 2019. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. The 2-year average twinning rate in the Holy Cross area is 19%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 41%. The current intensive management plan calls for stabilizing the population through harvest when the 2-year average twinning rate is 15–20%. Browse utilization is high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-040)  
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**PROPOSAL 186**

**5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

...

**What is the issue you would like the board to address and why?** Brown bear tag fee exemptions must be reauthorized annually. Reauthorizing the exemption allows residents who have not purchased the \$25 brown bear tag to take bears opportunistically. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically.

Region III (Interior and Northeast Alaska) brown bear populations are healthy, and harvest is monitored through the brown bear sealing requirement. Reauthorizing all resident brown bear tag fees throughout Region III maintains simpler regulations, high resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization includes tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

The Alaska Department of Fish and Game estimates that brown bear harvest accounts for less than 6% of the bear population. Harvest is composed primarily of males and is sustainable. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed by adjusting seasons and bag limits. The absence of resident tag fees that were in place prior to 2010 appears to have little effect on net harvest across the region in general.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-038)  
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**PROPOSAL 187**

**5 AAC 92.015. Brown bear tag fee exemption.**

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

**5AAC 92.015. Brown bear tag fee exemption**

(a) A resident tag is not required for taking a brown bear in the following units:

(1) Unit 11;

(2) Units 13 and 16(A);

(3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

(1) Unit 9(B);

(2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);

(3) Unit 17;

...

**What is the issue you would like the board to address and why?** Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for bear hunts near communities in Units 9 and 10 to address public safety concerns in communities. Brown bears are abundant in Units 9 and 10 and are managed primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The liberalized bear seasons and bag limits adopted along with the elimination of the tag fee were intended to allow people to take bears opportunistically, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-037)  
\*\*\*\*\*

**PROPOSAL 188**

**5 AAC 92.015. Brown bear tag fee exemptions.**

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

- ...
- (4) Units... 26;
- ...
- (8) Unit 22;
- (9) Unit 23;
- ...
- (13) Unit 18;
- ...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- ...
- (4) Unit 18;

- ...
- (7) Unit 22;
- (8) Unit 23;
- ...
- (10) Unit 26(A)

**What is the issue you would like the board to address and why?** The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. We recommend continuing resident tag fee exemptions for the general season and subsistence season hunts in Region V (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 9 years; Unit 22, where the tag fee has been exempted for 19 years; Unit 23, where the tag fee has been exempted for 14 years; and Unit 26A, where the tag fee has been exempted for 9 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for RY2012 and harvest has remained within sustained yield and continues to be similar to the preceding ten-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements include: 1) registration permit, 2) tag fee exemption, 3) salvaging meat for human consumption, 4) no use of aircraft in Units 22, 23 and 26A, 5) no sealing requirement unless hide and skull are removed from subsistence hunt area, and 6) if sealing is required, the skin of the head and front claws must be removed and retained by ADF&G at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADF&G for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, we estimate 0–3 bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging fewer than one bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest has been fewer than five bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between zero and five bears are taken annually by subsistence hunters.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-036)  
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# Proposals Outside the Board of Game's Authority and Other Proposals

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# **Proposals Outside the Board of Game's Authority and Other Proposals**

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*The Board of Game does not have authority to regulate guide activity. Fees for tags are set in Alaska Statute and would require an act by the legislature.*

## **PROPOSAL 189**

Lower the cost for nonresident hunters and remove the hunting guide requirements.

**What is the issue you would like the board to address and why?** Tags for nonresident hunters are too expensive and difficult to find a guide for a reasonable price.

**PROPOSED BY:** Curtis Wright (EG-F22-003)

\*\*\*\*\*

*The Board of Game does not have authority to add trapping licenses to the Alaska Resident Disabled Veteran License program. It would require the legislature to change to Alaska Statute 16.05.341.*

## **PROPOSAL 190**

Solution: include trapping license as part of the Alaska Resident Disabled Veteran Licenses program.

**What is the issue you would like the board to address and why?** Issue: Disabled Veterans Hunting/Fishing License.

Why: Currently the Alaska Resident Disabled Veteran License does not include trapping. After speaking with ADF&G there was no knowledge of why this is. It would certainly make sense and add benefits to Alaska's disabled Veterans if this could be included in the free license at no cost to the Veteran.

**PROPOSED BY:** Sean McKenney (EG-F22-026)

\*\*\*\*\*

*The Board of Game does not have authority to regulate transporter activity.*

## **PROPOSAL 191**

A transporter shall transport hunters in Prince William Sound every year or Kodiak Island, but not both.

**What is the issue you would like the board to address and why?** Transporters on Kodiak Island is what I would like to address. There are too many. Every year more and more. There is no cap on them, no limit, just more every year. I propose like guide areas with hunting guides, a limit on transporter areas.

**PROPOSED BY:** Stig Yngve (EG-F22-019)

\*\*\*\*\*

*The Board of Game does not have authority to regulate transporter activity.*

**PROPOSAL192**

Transported hunts in Unit 8 shall be from October 25 - November 30 and January 1 to May 15.

**What is the issue you would like the board to address and why?** There are too many transporters in Unit 8 during the fall deer season. It is dangerous to hunt for Kodiak Island residents in many bays at risk of getting shot from October onward. Money and money opportunity is taking precedence over subsistence. You can eat deer but you can't eat money.

**PROPOSED BY:** Stig Yngve (EG-F22-021)

\*\*\*\*\*

*The Board of Game does not have authority to regulate transporter activity.*

**PROPOSAL 193**

No business entity or individual may operate more than one transporter vessel in Unit 8.

**What is the issue you would like the board to address and why?** There are too many transporters in Unit 8.

**PROPOSED BY:** Stig Yngve (EG-F22-022)

\*\*\*\*\*

*The Board of Game does not have authority to regulate guide activity.*

**PROPOSAL 194**

Any individual that holds a federal exclusive guide use concession area is excluded from having any employed or contracted guide, second degree of kindred relative, or themselves apply for a drawing permit hunt in the area in which they hold the exclusive guide area.

**What is the issue you would like the board to address and why?** Exclusive guide concession owners have guides and family members apply for resident pool tags in their exclusive area. \$30 a year investment for a chance to keep a resident out of their area is very financially lucrative. There are numerous owners having their kids, guides, and wives doing this every year, and at least four tags will most likely not be used in this fashion in the last draw cycle that I know of, if not more. This proposal does not exclude guides and relatives from hunting other Unit 8 sub-areas, just not taking away legal resident opportunity for the sake of reducing competition in their contracted area.

**PROPOSED BY:** Chris Wallstrum (EG-F22-034)

\*\*\*\*\*

*The Board of Game does not have authority to regulate guide activity,*

**PROPOSAL 195**

Any individual cannot hold more than one federal exclusive guide use concession area for Units 8 or 9.

**What is the issue you would like the board to address and why?** Too many guide concession permits are concentrated with too few individuals creating a monopoly in hunt areas of Units 8 and 9. Additional guides operating will help with competition and create a more healthy system of competition and price.

**PROPOSED BY:** Christopher Wallstrum (EG-F22-038)

\*\*\*\*\*

*The Board of Game does not have authority to create migratory bird hunting zones due to the US Fish and Wildlife Service federal framework for waterfowl hunting zones.*

**PROPOSAL 196**

Create a new migratory bird hunting zone consisting of the waters of Kachemak Bay and its drainages. This would allow for regulations addressing specific conservation concerns, and open the possibility of changing season dates for cranes, geese, and ducks to allow for later season hunting for ducks, and possibly a specific earlier season to increase opportunities for crane hunters.

**What is the issue you would like the board to address and why?** Kachemak Bay is a unique ecosystem and it is difficult to manage discrete populations of wintering sea ducks when any adapted regulation would affect the entire Gulf Coast migratory bird hunting zone.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-056)

\*\*\*\*\*

*Changes to Game Management Unit boundaries is on the board's Statewide Regulations schedule. Because the Call for Proposals for this cycle may not have been clear, the proposal is included in this section of the book for board review. The board could request it be scheduled for consideration at the Southcentral Region meeting when the board meets in November to address agenda change requests. If the board requests it be scheduled, the public will be notified well in advance of the meetings.*

**PROPOSAL 197**

**5 AAC 92.450. Description of game management units. .**

Divide Unit 15C into two subunits as follows:

Unit 15D consists of that portion of Unit 15 that will include all of 15C south of the Tustumena Glacier, Glacier Creek Tustumena Lake, and the large bend in the Fox River where the river turns south.

**What is the issue you would like the board to address and why?** Divide Unit 15C to create two subunits: 15C and 15D to align management prescriptions with areas of stark physiographic

differences of topography, climate, geology, vegetation, wildlife species, distributions and density.

ADF&G utilizes the USGS Unified Ecoregions of Alaska map to depict Alaska’s 32 ecoregions.

ADF&G website defines an ecoregion as “an area of land and water containing vegetation communities that share species and ecological dynamics, environmental conditions, and interactions that are critical for their long-term persistence.”

North Unit 15C, overlays the Coast Mountain Boreal; Cook Inlet Basin ecoregion of gently sloping lowlands of lakes, swamps, bogs, and rivers drained from glaciers.

Annual snowfall 63 - 100 inches. Precipitation from 15 - 27 inches.

15D (South 15C), would overlay two rugged ecoregions within the distinct Hyper-maritime Forests; the Chugach (Kenai) Mountains Ecoregion, with ice fields, narrow deep gorged valleys; fringed with the Gulf of Alaska Coastal Ecoregion. of deeply carved glacial fjords, archipelagos and short swift streams. Elevations dramatically rise from sea level up to 5000 feet. Maritime climate.

Annual snowfall from 32 - 236 inches. Precipitation from 30 - 160 inches.

The proposed Unit 15D area consists of Kenai National Wildlife Refuge land, Kachemak Bay State Park and Wilderness Park land, and Alaska Native Corporation land.

Kachemak Bay waters and submerged intertidal lands are legislatively designated State Critical Habitat Areas (CHA) for the “perpetuation of fish and wildlife”. These CHA overlay Special Purpose Site Park lands and waters located within the proposed Unit 15D.

**PROPOSED BY:** N.J. Hillstrand (EG-F22-092)

\*\*\*\*\*

*The Board of Game does not have authority to regulate guiding activities nor issue multiple permits to guides.*

**PROPOSAL 198**

I would like to see guides get a number of tags to take nonresidents hunting, so they can come hunting and while hunting with a guide, there will be fewer nannies killed and the number of goats will go up.

**What is the issue you would like the board to address and why?** Number of tags for goats.

**PROPOSED BY:** Frank Danford (EG-F22-115)

\*\*\*\*\*

*The Board of Game does not have authority to establish a hunt that restricts eligibility based on residence.*

**PROPOSAL 199**

Create a village registration elk hunt by designating eight permits each to be distributed in person in the communities of Ouzinkie and Port Lions. Each community would receive two permits that are removed from each of the existing Elk drawing hunts DE715, DE717, DE721, and DE723. The new village registration elk hunt permits would begin two (2) weeks prior to the first day of DE715 & DE721 and shall last two (2) full weeks.

**What is the issue you would like the board to address and why?** The issue we are looking to address with this proposal is the reduced or no elk hunting opportunities for residents of Ouzinkie and Port Lions in Unit 8 (Afognak and Raspberry Islands). Elk harvesting opportunities have declined dramatically in recent years due to a combination of circumstances. All Roosevelt Elk hunting is conducted on Afognak and Raspberry Islands, located in the northern portion of the Kodiak Archipelago. Nearly half of all land on these islands is private property and owned by the Ouzinkie Native Corporation and the Afognak Native Corporation which are Alaska Native Claims Settlement Act (ANCSA) Village Corporations. Additionally, the majority of Ouzinkie and Port.Lions residents are shareholders of these corporations. Over the past two years, no one from Ouzinkie or Port Lions has drawn an Elk tag for Afognak. This has been a traditional hunt for both villages since 1950.

The first is an increase in the overall number of individuals submitting for those drawing tags, thus reducing the potential for residents to receive a permit. The second is an increased rate of success by those who did receive a permit in Unit 8 (Afognak and Raspberry Islands). These factors have prevented the ADF&G from opening some sections of Afognak for elk registration hunting, further reducing village residents from obtaining their game.

**PROPOSED BY:** Harold Squantsoff, Chair, Hunting Committee, Ouzinkie Native Corp.  
(HQ-F22-033)

\*\*\*\*\*

*Proposals 200 – 203 were submitted prior to the Board’s regularly scheduled deadline of May 1, but because that date fell on a Sunday, the deadline was moved up to Friday, April 29, 2022. Because the change in the deadline may have been confusing, the proposals are included in this section of the book for board review. The board could request they be scheduled for consideration at the regulatory meetings when the board meets in November to address agenda change requests. If the board requests any of these proposals be scheduled, the public will be notified well in advance of the meetings.*

**PROPOSAL 200**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Create a moose hunt in the Southcentral Region for seniors over the age 65 with ADF&G Permanent ID as follows:

Special moose season for seniors.

No proxy allowed.

Sept. 26 - 30

**What is the issue you would like the board to address and why?** Moose season for seniors over 65 with PID license. Motivate the younger crowd to take seniors hunting, help seniors call moose to areas accessible to them

**PROPOSED BY:** David Strawser (EG-F22-161)  
\*\*\*\*\*

**PROPOSAL 201**

Create a sea otter management plan to begin the process of creating a state hunting season for sea otters as follows:

Yes, it is illegal federally to harm or kill a sea otter. As past practice has shown, the federal government will not prosecute if the state allows an activity. For example, marijuana or a felon in possession of a firearm. Creating a state sea otter management plan will allow for state legal harvest of sea otters by residents only. Currently, the sea otters are destroying Southeast Alaska and their population and range is growing

**What is the issue you would like the board to address and why?** Create a sea otter management plan to begin the process of creating a state hunting season for sea otters.

**PROPOSED BY:** John Ryan (EG-F22-162)  
\*\*\*\*\*

**PROPOSAL 202**

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

Set the season length for taking wolves in Unit 2, without closing early due to emergency order as follows:

The last board cycle, ADF&G submitted a new Unit 2 Wolf Management Plan. They followed it for one year and have since disregarded it and catered to outside special interest groups for wolf preservation. Unit 2 has an overwhelming high wolf population. I'm asking the Board of Game to come up with some protection so the wolves can be managed in Unit 2 without ADF&G interfering with the wolf management season.

**What is the issue you would like the board to address and why?** Unit 2 wolf season: set season length without interference of emergency closures.

**PROPOSED BY:** John Ryan (EG-F22-163)  
\*\*\*\*\*

**PROPOSAL 203**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a moose drawing hunt within Unit 14C in Kincaid Park for hunters that meet the 70% disability standard with mobility impairments as follows:

The proposal is for a drawing tag for antlerless moose in Kincaid Park in Anchorage (Unit 14C) for hunters that meet the 70% disabled standard and require a mobility device like a wheelchair or prosthetic limbs to get around (similar to hunting with a motor vehicle in the Kenai National Wildlife Refuge). This hunt would occur later in the fall than many other moose hunts due to the abundance of organized events in the early fall. This hunt would require short-range firearms such as shotguns with slug or black powder rifles and a proficiency exam similar to DM666. Not all portions of the park will be open for this hunt. hunters issued this permit will require an able-bodied assistant to ensure the safe and efficient removal of the harvested animal.

**What is the issue you would like the board to address and why?** There are no current moose hunting opportunities for hunters with mobility impairments that are not US military Veterans in the State of Alaska.

Kincaid Park has many documented moose attacks on park users with EMS calls and many more undocumented attacks where the victim or an associate took them to receive medical attention.

This hunt would solve both an equity and a public safety issue.

**PROPOSED BY:** Ira Edwards

(EG-F22-164)

\*\*\*\*\*