



Name: Raymond Heuer

Community of Residence: Fairbanks, Alaska

Comment:

I am the author of proposal 187. I support this proposal with the following changes. It was not my intent to standardize the wolverine season throughout the region to mirror 20C season dates. I simply want all of 20C to close on the same day (which is one month longer, for the small portion of 20C East of the Toklat and South of the Kantishna rivers). There may verywell be good reason to leave the other units or subunit dates as they are. I am simply suggesting that this small offset of 20C does not appear to be of significant enough importance to the wolverine populations to demand it to be seperated from the remainder of 20C. In fact the portion of the unit that remains open longer is actually better wolverine habitate and there is no trapping allowed in the National Park.

I would recomend striking:

west of the Toklat and Kantishna rivers.

And

20C remainder.

The regulation should then read :

Area.	Open Season
Unit 19, 20C, 21, 25A, 25B, and 25D	Nov 1- Mar 31

Proposal 187: Support with Amendment



PC52

Name: Bill Iverson

Community of Residence: Soldotna Alaska

Comment:

Proposal 195. Do not Adopt

The cow population in the area around Deska Landing is almost nonexistent. I've seen 4 cows in the last three years. I am in the area for most of the entire season

The area biologist said that most of the count numbers were in the upper areas. Therefore they need to focus the hunts there instead of in the easily accessible areas. Limit the hunts to the northeast side of the Parks highway in the upper sections only.

We really need to break up 14a into some smaller units.

I have hunted this area for close to 50 years and it has been decimated by these aggressive Antlerless hunts.

The winter hunts are the worst idea as the moose are already distressed and the snow machines chasing them around burns up the needed fat they need to survive.

Proposal 154: Oppose

Proposal 159: Oppose



PC53

Name: Diane Jewkes

Community of Residence: North Pole, Alaska

Comment:

Members of Alaska Board of Game

I am writing to express my support for Proposal 176. I believe the changes in 176 will allow continued quality hunts for both residents and nonresidents. As a 50yr resident, I have hunted the Salcha River as a way to fill the freezer and enjoy the State of Alaska for most of those years.

Please adopt proposal #176.

thank you.

Diane Jewkes



Proposal 176: Support



PC54

Name: Eric Jewkes

Community of Residence: Fairbanks, Alaska

Comment:

I am writing to express my support for Proposal 176. Several factors continue to place increased hunting pressure on the upper Salcha river. Factors such as; rapid and steady increases in modes of transportation, increases in the 40 mile caribou hunt, widespread antler restrictions and shorter seasons in other areas of the state, make proposal 176 a needed adaptation.

While the upper Salcha area may be a relatively large area, the hunting area is almost universally limited to the river corridor. As you well know the upper Salcha is accessed through the lower Salcha, effectively increasing hunting pressure on both areas. A corridor which is also home to a large property owners group, and used by caribou hunters. Proposal 176 will spare this corridor from an influx of non-resident hunters looking to avoid the restrictions of most other areas. As their ability to access this area becomes easier from increased technology, the long term effect would be to impose restrictions on all hunters.

Thank you,

Eric Jewkes

Proposal 176: Support



PC55

Name: Leonard Jewkes

Community of Residence: North Pole, Alaska

Comment:

Proposal 176

Please adopt 176, because of moose decline, harsh winters, increase of hunting pressure from non-residents because of antler restrictions in many other areas of the state and predators. This offers residents a hunt to fill freezers and still offers non-residents a quality hunt.

If not adopted, I believe all user groups will need to be restricted in the future.

Proposal 176: Support



PC56

Name: Kaylene Johnson-Sullivan

Community of Residence: Palmer

Comment:

I live in Palmer, AK, and would like to comment in support of NPS Proposal 186. The value of wildlife must be measured in more than consumptive uses for harvest and subsistence. The majority of Alaskans and visitors to Alaska support the conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC57

Name: Nick Jouflas

Community of Residence: Anchorage, AK

Comment:

Proposal 88 - Unit 19C

Hello,

I am writing in opposition of proposal 88 in unit 19C to change from a general season hunt to an archery only season.

After the 2022 season, when the moratorium for non-resident hunters was placed on unit 19C, there were only 3 rams harvested by resident hunters in unit 19C. Mr. Forward claims in his proposal that resident success was as high as 40%, however the harvest data from 2022 shows that Resident success was only 7.9%.

I believe that the moratorium on Non-Resident hunting in 19C was appropriate given the condition of the statistics. However, changing 19C to an archery only season is not only unnecessary, but an unfair resource allocation to a specific user group. Changing 19C to an archery only season for Residents, will have a net-zero impact on the sheep population in 19C.

Thank you for your consideration.

Proposal 88: Oppose

Proposal 130: Oppose

Proposal 131: Oppose

Proposal 181: Oppose



PC58

Name: Chris Keefe

Community of Residence: Denver, Colorado

Comment:

Wildlife management must be driven by science, not politics and special interest. Wolves don't recognize human boundaries.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



PC59

Name: Michael King

Community of Residence: Fairbanks, Ak

Comment:

I support this proposal.

Proposal 176: Support



PC60

Name: Jenna Klein

Community of Residence: Anchorage, Alaska

Comment:

My name is Jenna Klein, and I moved to Alaska in September 2018 from California. I have made this beautiful place my new home, in part, because of the incredible respect Alaskans show for its wild places and wild animals.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



Name: Grant Kopplin

Community of Residence: Palmer Alaska

Comment:

You have to approve proposal 130

And go back to the way things were. Proposal 131 is just a tag grab to give more hunts to guides to sell. If 10% of the tags happen to go to nonresidents because they got lucky and beat the 1% odds we all face, then great. But do not guarantee them

10%. That's just taking away opportunities and tags from residents. Please go back to the way it was with the delta tags, like the Delta AC is requesting.

Proposal 130: Support

Proposal 131: Oppose

If you approve 130 first to prevent 10% of all tags being guaranteed to non residents , then 133 would be great way to give bow hunters an exciting opportunity at delta sheep. I've never hunted sheep with a bow, but would apply for this tag with the hope of having slightly better draw odds and then getting to pursue sheep in DCUA

Proposal 130: Support

Proposal 133: Support

In regards to these 19c sheep proposals. I ask that the board realize that these are basically all written from commercial users who stand to gain financially from selling dall sheep hunts in 19c. Regardless of how low the sheep population is right now over there, guides and outfitters will continue to sell sheep hunts and hunt every last ram They find because they are just worried about getting paid. There is no guide concessions over so any outfitter can go back to selling however many sheep hunts they want.

All that being said, I do not believe non resident opportunity should be completely gone or taken away. I think proposal 82 is the best way to reintroduce non resident opportunity. A very limited draw hunt like to non residents still presents opportunity for them and then they can hire whatever guide they want and the guides still make money but it doesn't over run the hills with outfitters hunting down every ram and will

Hopefully let a few more make it and spread their genes and have a few older age class rams on the land scape. Residents have already reduced their pressure in the area.

The only thing stopping an army of guides is you guys so please do the right thing. A small draw hunt is the best way I believe to bring non residents back into the picture in 19c

There does not need to be winter subsistence sheep hunt. Thats ridiculous. Sheep are not a subsistence animal. Go bag a moose or caribou to fill the freezer.

I also support proposal 85. I think having some sort of consequence for shooting a younger ram would be good for the sheep and residents as well. This proposal would encourage residents to

pursue older rams which would improve hunt quality and be good for the resource. Proposal 86 would be good as well. I think proposals to encourage older age class ram Harvest and pushing the sheep hunting culture that direction would be good. There would hopefully be more mature rams on the land scape.

Proposal 76: Oppose
Proposal 77: Oppose
Proposal 78: Oppose
Proposal 79: Oppose

Proposal 80: Oppose
Proposal 82: Support
Proposal 84: Oppose
Proposal 85: Support

Proposal 86: Support
Proposal 87: Oppose
Proposal 89: Oppose
Proposal 90: Oppose

Proposal 43-46.

The board of game is looking at a lot of proposals aimed to limit resident opportunity. Besides proposal 43, all of these proposals were written by commercial users who stand to gain finically from the loss of resident opportunity. Or at least gain from having less pesky residents in the field competing for the same sheep that they make money from. The resources of the state belong to the people of the state, and the vast majority of your constituents, are residents of Alaska and I hope that you all remember that and put them first. If there is to be any reduction in opportunity or allocation of dall sheep to residents, than the non residents and guided hunting industry also need to give and should bear the brunt of any allocative reductions.

Any resident of Alaska who is a guide will still be able to hunt sheep and enjoy the resource, they just might not be able to exploit it for \$25,000-\$50,000 a head anymore or have less of an opportunity to do so. The average Alaska resident hunter is the primary individual that the board of game represents and I please ask that you remember that and put that individual first in your decision making when dealing with these dall sheep proposals. If someone isn't a resident of Alaska, especially non resident guides, then their concerns or worries don't matter because it's our state and our resources. I know there are a lot of resident outfitters and guides, and they would enjoy the same benefits or resident opportunity like every other resident. They just might face some reduction in being able to exploit the resource for finical gain.

If there is going to be any reduction to resident opportunity or allocation, then there should be HEAVY reduction to non resident/guiding opportunity first

Proposal 43: Oppose
Proposal 44: Oppose

Proposal 45: Oppose
Proposal 46: Oppose

Proposal 181 is great way to reduce to pressure and harvest on 20a sheep. There is a lot of guide pressure and user conflict from the amount of outfitters in the area, due to there being non guide use

Concession areas. Non residents have accounted for over half the harvest of sheep in 20a for the last several years and this limited draw hunt for non residents would protect their opportunity and also improve the quality of the hunt in the area by more rams surviving to mature age

Proposal 188: Support

This proposal would help with pressure and user conflict in this area of the state. It still allows some non resident opportunity, but reduces it and will ultimately reduce the harvest, which has been a concern in this area recently. Reducing non resident pressure before residents is the logical thing to do and falls inline with our state constitution. Putting

Non residents on a limited draw (say 10% of historical harvest for an area?) is the best way to limit their pressure but also protect their opportunity.

Proposal 144: Support

Proposal 117 is just a tag grab from residents to the guides. Please do not do this. If a nonresident draws the tag then great they can hire a guide and hunt it. But make them face the less than 1% draw odds residents face to get it. This is just taking away opportunity from residents and giving it to guides and non residents. They did this with DCUA tags (which you need to reverse and approve the proposal from the delta AC) and the tag went undersubscribed! All this is is a tag grab to give guides more hunts to sell. If a non resident wants to hunt tok or delta, make them face the same odds everyone else has to!

Proposal 119 is a great way to encourage residents to harvest older rams in a heavily pressured area. It would hopefully produce some older rams on the landscape

Proposal 117: Oppose

Proposal 118: Support



Name: Wayne Kubat

Community of Residence: Wasilla Alaska

Comment:

March 2024 BOG Comments

43 support - I see it as a compromise solution to complete closure and drawing permits

47 oppose – drawing permits are my least favorite option

48 support – I agree with making it as easy as possible for residents to take grizzlies

56-58 support – I’m in support of intensive mgt. efforts by ADF&G

60-62 I support - I support liberalized seasons and methods and means through a mgt plan to decrease current wolf numbers in 19C

76 – 81, 91 & 92: I support proposal 91 to form a sheep mgt. plan as first choice. I would hope to find a way to help the sheep and not just deal with allocation. Short of that, I’m torn between opening it back up as per proposals 76-81 or closing it completely as per proposal 92. In support of opening it back up to like it was, I generally support full curl management. I don’t think FC management is contributing to the decline or will slow the rebound. In support of closing it completely, sometimes it takes drastic action to get serious about fixing something and or making it better.

83 – 88 oppose - 87 is my proposal. I think there are better solutions as mentioned above.

93 – 99 – I could support any of these but 94 & 95 are probably my favorites. I support liberalized bear seasons and methods and means. Prey species in 19 C need help.

101 support

103 support

*Proposal 43: Support
Proposal 47: Oppose
Proposal 48: Support
Proposal 56: Support
Proposal 57: Support
Proposal 58: Support
Proposal 60: Support
Proposal 61: Support
Proposal 62: Support*

*Proposal 83: Support
Proposal 84: Support
Proposal 85: Support
Proposal 86: Support
Proposal 87: Support
Proposal 88: Support
Proposal 91: Support
Proposal 93: Support
Proposal 94: Support*

*Proposal 95: Support
Proposal 96: Support
Proposal 97: Support
Proposal 98: Support
Proposal 99: Support
Proposal 101: Support
Proposal 103: Support*



PC63

Name: Thomas Lamal

Community of Residence: Fairbanks, Alaska

Comment:

Proposal 176 tries to address an overcrowding issue which limits success for moose hunters. I know several families that hunt both the Salcha and Chena drainages and the current moose populations are stressed. These are narrow rivers and added boats make navigating a little challenging. Everyone that I know who hunts these drainages has a goal of filling their freezer.

This proposal will help make a trip for families and their kids more enjoyable and hopefully successful.

Proposal 176: Support



PC64

Name: Donald Lee

Community of Residence: Fairbanks, AK

Comment:

Proposal #110

I strongly oppose any cow moose hunts in any portion of unit 20E. I have hunted moose as a resident of first Tok and then Fairbanks for many decades including the Ladue (winter) hunts. On the ground evidence in the areas I have hunted would suggest that moose numbers have declined. I have seen less cows in both fall and winter hunts over the last 4 years than I have seen in many many years! ADFG's own data suggests moose numbers have at the very least, plateaued. The reasoning that allowing cow hunts would bring cow:bull ratios more in line with what it desired seems like a backward way to address the ratio "problem." Killing cows is only going to result in even less bulls on the landscape (in the future) and less cows too for that matter. Another proposal in this current cycle is to reinstate aerial wolf hunting (presumably to increase moose/caribou numbers). Which is it? Are we going to try to encourage moose numbers to rise through predator control or are we going to start killing cows??? I would instead suggest that we undertake intensive habitat measures. In otherwords, managing for increased opportunity, improved bull:cow ratios and habitat/forage that can support increased numbers of ungulates should involve the regular usage of prescribed burning.

Thankyou for this opportunity to comment.

Donald Lee III

Proposal 110: Oppose



PC65

Name: Mike Lee

Community of Residence: Central point Oregon

Comment:

I have archery hunted off the Dalton for 2022 and 2023 seasons. This proposal is written to only address an acute area. Limiting tags unit wide to address one transporters ability to take a massive number of people upriver is not a solution. The archery hunters that are hunting within the 5 mile area would be the ones negatively impacted by this. This proposition is written to address an over pressure in one area that is caused by one transporter. A simpler solution would be to limit the number or time frame a transporter can operate in the affected area.

Proposal 156: Oppose



PC66

Name: Dave Leonard

Community of Residence: Bettles Field, AK

Comment:

Proposal #44

In order to be consistent with current Non Resident requirements and in consideration of the current Sheep populations across the state, the board should adopt a one Full curl ram every four years for Residents until the Sheep population recovers.

Proposal #45

I strongly support the Department on the 4 regulatory year requirement for Residents.

Non Resident 4 year requirements have been in place for a good number of years.

Proposal #46

With the condition that Non Resident Sheep hunters receive 20% of the drawing permits and Guides who are currently conducting Sheep hunts on Federal Lands receive a specific number of Sheep permits. This could be based similar to the Kodiak system.

Proposal#140

Harvest of Caribou in Unit 24B specifically by non residents is incidental to the overall harvest. Therefore there is no need for a closure.

Proposal #181

Using the data provided for GMU 20A, if a drawing hunt was implemented, in order to be consistent, it should be required for both Residents and Non Residents.

In addition, the Board should consider limiting both Residents and Non Residents to one Full Curl Ram every 4 Regulatory years.

Proposal 43: Support
Proposal 44: Support with Amendment
Proposal 45: Support
Proposal 46: Support with Amendment
Proposal 47: Support

Proposal 48: Support
Proposal 49: Support
Proposal 50: Support
Proposal 51: Support
Proposal 52: Support
Proposal 140: Oppose
Proposal 146: Support

Proposal 147: Support
Proposal 149: Support
Proposal 150: Support
Proposal 151: Support
Proposal 152: Support
Proposal 181: Support with Amendment



PC67

Organization: Cory Lescher Photography

Name: Cory Lescher

Community of Residence: Anchorage, AK

Comment:

I support the National Park Service Proposal 186. I own and operate my own photography business in the State of Alaska and value the protection of Alaska Wildlife. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. Thank you for considering my comments today, I hope you will approve Proposal 186.

Proposal 186: Support



PC68

Name: Sherry Lewis

Community of Residence: Fairbanks, Alaska

Comment:

I support proposal 186. Wolves are very important for the tourist industry and for study for science in Denali National Park. Tourism is one of the businesses that brings in the most money to Alaska. Many tourist come to Alaska to see wolves as they figure it's their only chance to see them. Denali National Park is one of the places they come to see wolves, however, because of heavy trapping and hunting of wolves, especially in the stampede area, there has been very few wolves seen in the park in recent years. I used to work in the Park in the 80s and we saw wolves all the time. Now they are rarely seen, which is a very sad state of affairs.

Please pass proposal 186 and help protect wolves on state lands in the wolf townships.

Thank you, Sherry

Proposal 186: Support



PC69

Name: Farhana Loonat

Community of Residence: Mount Vernon, WA

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC70

Name: Eugene Lunceford

Community of Residence: North Pole, Alaska

Comment:

171- No. Hunting opportunities near Fairbanks should not be restricted, but expanded.

172- Yes, more opportunities are better and I dont think there are that many muzzleloaders hunters.

173- No, Too many cow moose were taken in previous years and the winter die off that closed the season proved it. Give them a few more years and re-address. A better option would be a bounty on wolves.

182, 183, 184, 185. Any proposal to extend grizzly season in unit 20 should considered. In 20A we never saw a Grizzly for decades. Last September had a sow and cub 2 miles from camp and a boar (I was forced to take) just behind moose camp on Salchaket. Change the regulatory year to be Calender year. If you kill one in the fall you cant the next spring.

186- Each wolf kills something like 7 moose a year. Less wolves, more moose survive.

Proposal 171: Oppose

Proposal 172: Support

Proposal 173: Oppose

Proposal 182: Support

Proposal 183: Support

Proposal 184: Support

Proposal 185: Support

Proposal 186: Oppose



PC71

Name: Mont Mahoney

Community of Residence: Big Lake, Alaska

Comment:

Proposal # 43, Mont Mahoney

I wholeheartedly support this proposal as submitted by the Upper Tanana/Fortymile Fish and Game Advisory Committee. Reducing the number of sheep hunters in an equitable manners, as stated in the proposal, will not only improve the sheep hunting experience but reduce the pressure on the sheep. In the name of CONSERVATION, we can give the sheep a little break! This is a win win proposal!

Proposal # 45, Mont Mahoney

I support this proposal to reduce the bag limit for Dall Sheep for residents, to one ram every four years but keep the current Alaska Fish & Game Regulation for a legal ram to not only full curl but also the three other methods of determining a legal ram such as, double broom and 8 years old, as in counting annul, etc.

Proposal 43: Support

Proposal 45: Support



PC72

Name: Sylvia Maiellaro

Community of Residence: Anchorage, AK

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support

Dear Members of the Board of Game,



PC73

My name is Herb Mansavage and I would like to make a comment regarding Dall sheep rams of Alaska, which pertains equally to proposals being brought up for the 2024 Interior and Eastern Arctic region Board of Game meeting.

As a lifelong resident Dall sheep hunter, and member of this unique user group, we have seen our Dall sheep numbers fall dramatically in the past several years. Much of this can be attested to unfortunate icing conditions and harsh winters. Development of predator roles in this decline has been observed by the department and lamb take by predators seems to be a significant issue as well. But one subject that I do not believe is being monitored from a biological perspective enough is the trophy quality of rams being taken. Higher trophy quality with Dall sheep rams is, in most cases, synonymous with old rams. Whether mature rams are taking larger hardships due to harsh winters, icing conditions or predators, they are fundamental in creating and maintaining healthy sheep herds. Their ability to teach younger rams how to survive is essential to the health of the individual herds.

While I believe full curl, 8 years or older and/or broomed on both sides is a sound management strategy, there needs to be more focus on the take of older rams and even more focus on not harvesting younger rams. The latter I believe is extremely pivotable to the success of our Dall sheep herds. Environmental factors are uncontrollable, besides predator management, but creating a plan to limit the take of rams under 8 years old is one way that the future of our sheep herds would only see benefit from.

There are proposals that seek to penalize hunters for harvesting rams under 8 years old by restricting hunting rights for future years after a harvest of said ram. While I support this idea, I do not believe the penalty is correct and believe there are other options that could be explored. A couple options that could be explored would be:

- Education for hunters explaining the biological reasons for harvesting larger/older rams and avoiding harvesting young, but still legal rams.
- Encouraging guides to limit client numbers when known areas do not hold trophy/old rams.
- Changing regulations to an older age. Such as from 8 years old to 9 years old. Or even from 8 years old to 10 years old.

The caveat to the whole issue is that Dall sheep are one of the most prized animals to hunt in the world. Sheep hunters generally do not want to share information, understandably, and others do not find the trophy value as significant as others. There is no doubt that harvesting any legal ram is an incredible experience. While I understand changing the legal requirements would not be a popular opinion, this is not being proposed from a perspective of healthy and strong Dall sheep populations. Unless we address the need for more trophy/old Dall sheep rams on the mountain, we may soon discover that we have crossed a line that will only mean a slower return of Dall sheep and lost hunting opportunities due to this population crisis.

For next year's meeting I will provide more data regarding the decline of trophy/old sheep in the state of Alaska in hopes of bringing less anecdotal evidence to the table. I would ask the board to carefully consider the Dall sheep proposals this year and amend where needed to create a larger focus on the need for more trophy/old sheep in the mountains.

Sincerely,

Herb Mansavage



PC74

Name: Melinda Marquis

Community of Residence: Nederland, Colorado

Comment:

I support the National Park Service Proposal 186.

I live in Colorado and frequently go backpacking in Alaska. The National Park Service Proposal 186l will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Sincerely,

Melinda Marquis

Proposal 186: Support



PC75

Name: Dominick Martinson

Community of Residence: Valdez Alaska

Comment:

Taking of full curl rams has no effect on the population of rams, so this rule change is not for conservation purposes.

All it will do is take opportunities from the residents and give it to the guides. These guides by the way are mostly all based out of state, so most of the money isn't even staying in the state. These proposals are not going to help the sheep populations and there not going to help the residents of the state so what is the point ?

Proposal 43: Oppose
Proposal 44: Oppose
Proposal 45: Oppose
Proposal 46: Oppose

Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose



PC76

Name: Margaret McGinnis

Community of Residence: Hull, MA

Comment:

Although I don't live in Alaska, I want to see wolves protected. I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem. Wildlife, including wolves, and vast wilderness are the reasons people come to Alaska - there are no Disneylands, tropical beaches, etc. Without healthy wolf and other wildlife populations, why would anyone come?

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC77

Name: Thomas Meade

Community of Residence: Anchorage, Alaska

Comment:

I strongly support Proposal 186 limiting wolf hunting.

Proposal 186: Support



PC78

Name: Peggy Meisch

Community of Residence: North Branch, MN

Comment:

I was a volunteer, teaching about wolves for many years. Alaska occupies a large part of my heart with wonderful memories of my 7 trips there. The mindset of many Alaskans against wildlife causes me great concern. Alaska is their home. We do not have the right to destroy any

animal that is an inconvenience. The Lower 48 is a bleak example of what happens when humans destroy their natural habitat. Please don't make Alaska "Outside."

Proposal 43: Support

Proposal 44: Support with Amendment

Proposal 45: Support

Proposal 48: Oppose

Proposal 50: Oppose

Proposal 51: Support

Proposal 52: Oppose



PC79

Name: Dan Montgomery

Community of Residence: Wasilla, Alaska

Comment:

Thank you chairman Burnett for this opportunity to comment on these proposals.

My name is Dan Montgomery. I'm a 42 year resident of Alaska, I've lived in Southeast Alaska, the Arctic and the last 32 years in the Mat- Su Valley. I've served on the Mat Valley A/C for the last 15 years. I've made my living as a big game guide since 1993.

Proposal 46. I'm the author of this proposal and I support it. I think going to draw permits in these units is the best way to reduce the hunting pressure on the ram population in these areas. There has been a 50% to 80% decline in the sheep populations in unit 19 and 20 and unit 12 is down some and is receiving a tremendous amount of resident pressure the last 2 years. There were 340 rams harvested statewide last year by 1,491 sheep hunters. About 40% or 136 of these rams were 7 years old or younger. Almost all of these rams were full curl or they were broken on both horns otherwise they wouldn't have been legal to harvest. These are the rams with superior genetics that reach full curl at a young age that you want to live and breed in the fall but they never had a chance too. My only goal for this proposal is to turn down the hunting pressure on these sheep populations and get more mature rams back in the populations and have all hunters have a better experience with less crowding. Winter weather is the main reason for the population declines and we can't change that. I envision a large number of permits for unit 19 and 20, somewhere around 120 in each unit. There were 282 resident hunters and only 21 non-residents hunters in unit 12 in 2023. I envision about 200 total permits for this unit. That would be 160 resident permits and 40 non-resident permits. Not all of the non-resident permits would be used at this time because most of the sheep are on federal ground and the guides have exclusive guide use areas and have reduced the number of hunters they are taking because of the lack of mature full curl rams in the population. This is a good solution to the problems these sheep populations are having.

Proposals 76,77,78,79,80,81and 87. I support all these proposals to reopen 19C to non-residents with amendments. I would amend them to have the non-resident season from August 10th to August 19. This 10 day season would reduce the number of hunters guides could take in that short season. The resident season would be August 10th to August 31st eliminating any hunting

during the moose and caribou seasons. There is no justification for a 42 day season with these depressed populations.

Proposal 131. I wrote this proposal and it is some house cleaning to lock in the 10% of permits for non-resident that the board adopted in the last statewide meeting and do away with any up to language in regulation.

Proposal 130. I appose this proposal it would take away the guaranteed 10% for non-residents.

Proposal 43: Oppose
Proposal 44: Support
Proposal 45: Oppose
Proposal 46: Support
Proposal 47: Oppose
Proposal 48: Support
Proposal 49: Support
Proposal 52: Oppose
Proposal 60: Support
Proposal 68: Support
Proposal 71: Oppose
Proposal 72: Oppose
Proposal 74: Oppose
Proposal 75: Oppose
Proposal 76: Support with Amendment
Proposal 77: Support with Amendment
Proposal 78: Support with Amendment
Proposal 79: Support with Amendment
Proposal 80: Support with Amendment
Proposal 81: Support with Amendment
Proposal 82: Oppose
Proposal 83: Oppose

Proposal 84: Support
Proposal 85: Support
Proposal 86: Support
Proposal 87: Support with Amendment
Proposal 88: Oppose
Proposal 91: Support
Proposal 92: Oppose
Proposal 93: Support
Proposal 94: Support
Proposal 95: Support
Proposal 96: Support
Proposal 97: Support
Proposal 98: Support
Proposal 99: Support
Proposal 100: Support
Proposal 101: Support
Proposal 102: Support
Proposal 103: Support
Proposal 104: Oppose
Proposal 105: Support
Proposal 106: Support
Proposal 107: Support
Proposal 108: Support
Proposal 111: Oppose
Proposal 112: Oppose
Proposal 118: Oppose
Proposal 119: Support

Proposal 130: Oppose
Proposal 131: Support
Proposal 132: Oppose
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Support
Proposal 137: Support
Proposal 138: Support
Proposal 142: Oppose
Proposal 156: Oppose
Proposal 157: Support
Proposal 158: Oppose
Proposal 159: Oppose
Proposal 160: Oppose
Proposal 161: Oppose
Proposal 162: Oppose
Proposal 163: Oppose
Proposal 164: Oppose
Proposal 165: Support
Proposal 167: Support
Proposal 168: Support
Proposal 177: Oppose
Proposal 181: Oppose
Proposal 182: Support
Proposal 183: Support
Proposal 184: Support
Proposal 185: Support



PC80

Name: Lenora Morford

Community of Residence: Chugiak Alaska

Comment:

BOARD OF GAME

I support Proposition 186 to protect the wolves north of Denali Park.

I have lived in Alaska since Feb. 1982.

I have never seen a wolf except in Denali National Park.

I have made many visits to the Park with friends and tourists. It is important to them that they see wolves in the wild.

The wolves are important for the ECONOMICS of the tourist industry (\$2 billion value last year) but also for the packs that are studied for science in the Park.

These important wolves need extra protection, and are MUCH MORE VALUABLE alive than dead. These Wolf townships used to protect wolves. Why not now??

Please vote to support Proposition 186.

Thank you,

Lenora Morford

42 year resident

Chugiak

Proposal 186: Support



United States Department of the Interior

NATIONAL PARK SERVICE

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

Date: 02/26/2024

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

Dear Chairman Burnett,

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

Proposal 43, 44, 45, 46, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 98, 90, 91, 92, 119, 158: NPS Recommendation: Neutral

The NPS has partnered with the Alaska Department of Fish and Game and others to document recent declines and changes in Dall's sheep populations across the state. We generally support creative solutions to address harvest reductions where needed, while recognizing the importance of sheep as a traditional source of sustenance for Alaskans. The NPS is currently funding sheep population surveys across multiple park units.

Proposal 52: NPS Recommendation: Oppose

This proposal would allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Game Management Units (GMUs) 12, 19, 20, 21, 24, 25, 26B, and 26C. The NPS opposes this proposal as the use of night vision goggles, forward-looking infrared devices, and artificial light runs counter to the principles of fair chase and sportsmanship. The use of artificial light is also prohibited for subsistence purposes under Federal hunting regulations, with few exceptions. If the Board adopts this proposal, NPS lands should be excluded.



Proposal 61, 62, 109, 147: NPS Recommendation: Oppose

Proposals 61 and 62 seek to establish an Intensive Management plan/program for Unit 19C and proposals 61, 109 and 147 would allow for the take of wolves the same day a person has been airborne in GMUs 19C, 12, and 24A and 25A, respectively. The NPS opposes all 4 proposals on the basis that these State determined predator control and Intensive Management strategies are not consistent with NPS 2006 Management Policy 4.4.3, and therefore are not allowed on NPS managed lands. Intensive Management programs are authorized under non-hunting regulations, and therefore they require NPS approval on national preserves. If the Board adopts these

proposals, NPS lands should be excluded from predator control efforts.

Proposal 120, 121: NPS Recommendation: Oppose

These proposals would increase the brown/grizzly bear bag limit for residents in a portion of GMU 12, which is almost entirely within Wrangell-St. Elias National Preserve, from one to two bears every regulatory year. The NPS has concerns with these proposals to liberalize brown bear harvest. There is a lack of reliable biological data on this brown bear population, although current densities are not considered high. This lack of information, coupled with inherently low brown bear reproductive rates, should be considered when evaluating these proposals. The Alaska National Interest Lands Conservation Act requires that subsistence and sport harvest be managed to minimize the likelihood of irreversible or long-term adverse effects upon such populations and species. If the Board adopts either of these proposals, we request that NPS lands be excluded.

Proposal 122, 123: NPS Recommendation: Oppose

These proposals would lengthen the wolf hunting season by approximately six weeks from April 30 to June 15 in GMUs 12 and 20E. The justification for Proposal 123 is predator control, which the NPS cannot support on NPS managed lands based on NPS 2006 Management Policy 4.4.3. Further, a hunting season extending past April 30 may allow take of females with dependent young during the pupping and rearing season. Therefore, an extended hunting season could jeopardize pup production and survival. Additionally, the quality of wolf pelts declines later in spring, so a result of this season extension could be to deny prime pelts to hunters the following fall.

Proposal 139, 140: NPS Recommendation: Neutral

Proposal 139 would reduce the bag limit for taking caribou from five caribou per day to four caribou per year, only one of which may be a cow, in GMUs 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A. Proposal 140 would close nonresident



caribou hunting in GMUs 21D Remainder, 22, 23, and 24B Remainder, 24C, 24D, and 26A. The NPS has partnered with the Alaska Department of Fish and Game and others to document recent declines and changes in migratory habits of the Western Arctic Caribou Herd, and we recognize the challenges facing those who depend on these caribou as a primary source of sustenance, both culturally and physically. While the current population size is not unprecedented, the environmental conditions facing the herd largely are unprecedented. Regulatory bodies must emphasize reductions in harvest, especially cows, while considering the needs and practices of local residents. We encourage and actively support efforts to improve harvest reporting to allow for the evaluation of impacts of regulation changes. The NPS is and will continue to be actively engaged with the Western Arctic Caribou Herd Working Group and supports actions consistent with the Western Arctic Caribou Herd Cooperative Management Plan's "Preservative Declining" management level.

Proposal 150: NPS Recommendation: Oppose

This proposal would lengthen the wolf hunting season by approximately six weeks from April 30 to June 15 in GMUs 24 and 25. The justification for Proposal 150 is predator reduction, to allow for incidental wolf harvest during spring bear hunting, benefiting prey species in the area, which the NPS cannot support on NPS managed lands based on NPS 2006 Management Policy 4.4.3. Further a hunting season extending past 30 April may allow take of females with dependent young during the pupping and rearing season. Therefore, an extended hunting season could jeopardize pup production and survival. Additionally, the quality of wolf pelts declines later in spring, so a result of this season extension could be to deny prime pelts to hunters the following fall.

Proposal 152: NPS Recommendation: Oppose

This proposal would increase the resident bag limit for brown bear in GMUs 24C and 24D and would open a fall bait season in GMUs 21B and 24B. NPS research on bears in this area indicates this is a low-density population, warranting caution when considering increased harvest. The Alaska National Interest Lands Conservation Act requires that subsistence and sport harvest be managed to minimize the likelihood of irreversible or long-term adverse effects upon populations and species. If the Board adopts this proposal, we request that NPS lands be excluded.

Proposal 157: NPS Recommendation: Support

This proposal would change the GMU 26A and 26B muskox hunt area boundaries to match federal hunt boundaries, effectively expanding state hunt areas. The NPS supports bringing federal and state regulations into alignment.



Proposal 167, 169: NPS Recommendation: Neutral

Proposal 167 would lengthen the season for nonresident drawing brown bear hunt DB987 by opening the season two weeks earlier in GMU 26B, and proposal 169 would remove the resident registration permits RB988 and RB989 for brown bear in GMU 26B. NPS research on bears in this area indicates this population is at low density and warrants caution when considering increased harvest opportunities. The NPS is concerned with minimizing the likelihood of irreversible or long-term adverse effects upon this brown bear population.

Proposal 186: NPS Recommendation: Support

This proposal would close a portion of GMU 20C to wolf hunting and trapping. Wolves in this area use portions of Denali National Park and Preserve where visitors come to enjoy wildlife viewing. Wildlife viewing provides important socioeconomic benefit to the state of Alaska. If this proposal is not adopted, wolves from the most commonly viewed packs will continue to be trapped and hunted just outside of park boundaries, in places as close as four miles from the park road. If the board supports this proposal, wolf packs important for wildlife viewing within Denali National Park will be protected.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me.

Sincerely,

**GRANT
HILDERBRAND**

Digitally signed by GRANT
HILDERBRAND
Date: 2024.02.27 12:16:25
-09'00'

Grant Hilderbrand
Associate Regional Director - Resources
National Park Service - Alaska Region
240 W. 5th Avenue
Anchorage, AK 99501

cc:

Superintendents, National Park Service, Alaska Region
Regional Director, National Park Service, Alaska Region
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Regional Director, U.S. Fish and Wildlife Service



To: Alaska Board of Game
Re: Proposal 186
From: National Parks Conservation Association

Dear Board of Game Members,

National Parks Conservation Association (NPCA) respectfully requests the Board adopt Proposal 186 in order to increase the chance visitors to Denali National Park will have the opportunity to see a wolf in the wild.

NPCA is a non-profit organization focused on protecting national parks for today and for future generations. Denali National Park is one of the great visitor experiences in the world, and people come from all over to drive the 90-mile road and be surrounded by wilderness. It is the closest many of them—particularly those with mobility challenges—will ever be to some of the things that make Alaska such an incredible place.

Surveys have shown that seeing a large carnivore is the highlight of such a trip. This goes for visitors from out of state, but for Alaskans too. Most Alaskans do not have the opportunity to see wolves in the wild in their daily lives and Denali is a relatively affordable, road-system alternative.

By adopting Proposal 186, the Board can significantly increase the percentage chance that visitors to Denali will see wolves. For many visitors, this can be a transformative, once in a lifetime experience. This is important in itself. It is also important for Alaska. The better people's experience visiting Alaska National Parks, the better Alaska's chance of increasing the size of our tourism industry and the better jobs and opportunities Alaskans will have in the Interior of the state.

Thank you for your consideration.

Jim Adams
Alaska Regional Director
National Parks Conservation Association
750 West Second Ave, #205
Anchorage, AK 99501



Organization: Tim's Alaskan guide Service

Name: Tim Nelson

Community of Residence: Chitina, AK

Comment:

#43

I oppose this proposal. As an outfitter operating out of units 24 and 25, it would be very inconvenient and expensive for my clients to end their hunt due to a registration hunt closure. It would also be logistically difficult for me to move their hunt to a new date because my hunts are already booked in advance.

#44

I support this proposal. Non-residents are already limited to 1 sheep every 4 years. Limiting residents to 1 sheep every 2 years would lower the overall harvest while still allowing residents to have more opportunities to hunt than non-residents.

#141

I support this proposal. Not only does the youth hunt in 24A and 25A allow spotting from the air, but it was created after the sheep population had already begun to decline and I believe that it should never have been put into regulation in the first place.

#142

I oppose this proposal. There is already a bow-only five-mile corridor on either side of the Dalton highway. I have a permitted camp inside the proposed 15-mile corridor and another one a few miles outside of the area. This proposal would be detrimental to my business and my livelihood.

#143

I support this proposal. Not only does the late-season archery hunt in 24A and 25A allow spotting from the air, but it was created after the sheep population had already begun to decline, and in my opinion, it should never have been put into regulation in the first place.

#144

I oppose this proposal. My main camp is in 24A. If sheep went to draw only in 24A it would be very difficult to book hunts which would put my business in jeopardy. I believe conservation could be better addressed by increased predator control.

#147

I support this proposal. Allowing hunters to take wolves in Units 24 and 25 the same day they have been airborne would help decrease sheep predation in turn helping to increase the local sheep population.

#149

I support this proposal. Extending the wolf trapping season in Units 24 and 25 would increase the harvest of wolves which would help decrease sheep predation in turn helping to increase the local sheep population.

#150

I support this proposal. Extending the wolf hunting season in Units 24 and 25 would increase the harvest of wolves which would help decrease sheep predation in turn helping to increase the local sheep population.

Proposal 43: Oppose

Proposal 44: Support

Proposal 141: Support

Proposal 142: Oppose

Proposal 143: Support

Proposal 144: Oppose

Proposal 147: Support

Proposal 148: Support

Proposal 149: Support

Proposal 150: Support



PC84



PC84



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM 24026

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

Dear Chairman Burnett:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the March 15-22, 2024 Interior and Eastern Arctic Region Meeting.

The Office of Subsistence Management, working with other Federal agencies, reviewed each of these proposals. The attached document includes comments from OSM regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources on or adjacent to Federal public lands in Alaska. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

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

Sincerely,

Amee Howard
Acting Assistant Regional Director

Enclosure



PC84

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
North Slope Subsistence Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director Wildlife Division, Alaska Department of Fish and Game
Administrative Record



PC84

OFFICE OF SUBSISTENCE MANAGEMENT

RECOMMENDATIONS

on

ALASKA BOARD OF GAME PROPOSALS

Interior/Eastern Arctic Region Meeting

March 15—22, 2024

Fairbanks, Alaska

Office of Subsistence Management (OSM)

**PROPOSAL 43 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Change all general season sheep harvest tickets in Units 12, 19, 20, 21, 24, 25, 26B, and 26C to registration permits, and allow hunters to obtain a registration permit once every two years.

Current Federal Regulations:**Unit 12 – Sheep**

Unit 12—1 ram with full curl or larger horn Aug. 10–Sep. 20.

Unit 12, that portion within Wrangell-St. Elias National Park and Preserve—1 ram with full curl horn or larger by Federal registration permit only by persons 60 years of age or older Aug. 1–Oct. 20.

Unit 19 – Sheep

Sheep: 1 ram with 7/8 curl horn or larger Aug. 10–Sep. 20.

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. Oct. 1–Mar. 30.

Unit 20 – Sheep

Unit 20E—1 ram with full-curl horn or larger Aug. 10–Sep. 20.

Unit 20, remainder No open season.

Unit 24 – Sheep

Units 24A and 24B (Anaktuvuk Pass residents only), that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes, and a daily possession limit of 3 sheep per person, no more than 1 of which may be an ewe July 15–Dec. 31.

Units 24A and 24B (excluding Anaktuvuk Pass residents), that portion within the Gates of the Arctic National Park—3 sheep, no more than one of which may be an ewe, by Federal registration permit only, with exception for residents of Alatna and Allakaket who will report by a National Park Service community harvest system Aug. 1–Apr. 30.



Unit 24A, except that portion within the Gates of the Arctic National Park—1 ram by Federal registration permit only Aug. 20–Sep. 30.

Unit 24, remainder—1 ram with 7/8 curl or larger horn Aug. 10–Sep. 20.

Unit 25 – Sheep

Unit 25A, that portion within the Dalton Highway Corridor Management Area No open season.

Units 25A, Arctic Village Sheep Management Area—2 rams by Federal registration permit only. Aug. 10–Apr. 30.

Federal public lands are closed to the taking of sheep except by rural Alaska residents of Arctic Village, Venetie, Fort Yukon, Kaktovik, and Chalkyitsik hunting under these regulations.

Unit 25A remainder—3 sheep by Federal registration permit only Aug. 10–Apr. 30.

Units 25B, 25C, and 25D—1 ram with full-curl horn or larger Aug. 10–Sep. 20.

Unit 26 – Sheep

Units 26A and 26B (Anaktuvuk Pass residents only), that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe July 15–Dec. 31.

Unit 26B, that portion within the Dalton Highway Corridor Management Area—1 ram with 7/8 curl or larger horn by Federal registration permit only Aug. 10–Sep. 20.

Unit 26A, remainder and 26B, remainder, including the Gates of the Arctic National Preserve—1 ram with 7/8 curl or larger horn Aug. 10–Sep. 20.

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

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board (Board) will consider two proposals (WP24-25 and WP24-26) submitted by the Western Interior Alaska Subsistence Regional Advisory Council at the Board's April 2024 regulatory meeting. WP24-25 requests to reduce the sheep harvest limit in Units 24A and 24B (excluding residents of Anaktuvuk Pass), that portion within Gates of the Arctic National Park from 3 sheep, no more than one of which may be an ewe, to 1 ram. WP24-26 requests that Dall sheep hunting on Federal public lands in Unit 24A and Unit



26B, west of the Sagavanirktok River be closed to all users for the 2024-2026 wildlife regulatory cycle. This would be a two-year continuation of the closure initiated by Wildlife Special Action WSA22-02.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users currently have opportunities to harvest sheep within these units on Federal public lands. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt under State regulations would need to obtain a State registration permit instead of a harvest ticket and would be limited to one ram every two years, which would reduce their opportunities under State regulations.

Adopting this proposal could benefit sheep populations, which are generally declining across the state (ADF&G 2022). Changing all harvest ticket hunts to registration permit hunts would provide ADF&G with better harvest data and more management flexibility, which could help conserve these sheep populations and enhance long-term hunting opportunity. Limiting everyone hunting under State regulations to one ram every two years by registration permit should decrease overall sheep harvest as well as the number of hunters targeting a dwindling number of available rams, which would also relieve overcrowding issues reported by the proponent.

Adopting this proposal would misalign State and Federal permit requirements, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: OSM supports changing the harvest ticket hunts to registration permit hunts. Improved harvest reporting data would provide a better understanding of harvest mortality, enhancing sheep management, while the increased management options provided by registration permit hunts (i.e., closing seasons early and limiting the number of permits issued) could help conserve sheep, ensuring long-term hunting opportunity.

OSM is neutral on limiting hunters to one permit every two years (except in Unit 19; see comments on Proposal 84). This could help conserve sheep populations, but it would also substantially decrease opportunity for federally qualified subsistence users hunting under State regulations.

Literature Cited

ADF&G. 2022. Board of Game Sheep Informational Meeting Presentation. Alaska Department of Fish and Game, Division of Wildlife Conservation. <https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/sheep/adfg-presentation.pdf>. Accessed January 24, 2024.

PROPOSAL 44 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reduce the sheep bag limit for resident hunters in Units 12, 19, 20, 24, 25, 26B and 26C to one ram with full-curl horn or larger every two regulatory years.

See comment for Proposal 43.



PROPOSAL 45 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reduce the Unit 12, 19, 20, 24, 25, 26B, and 26C sheep bag limit for residents to one ram with full-curl horn or larger every four regulatory years.

See comment for Proposal 43.

PROPOSAL 46 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.

Change all sheep hunting in Units 12, 19, and 20 to drawing permit only for residents and nonresidents, with a set allocation of permits between user groups.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt or allocation portion of this proposal.

See comment for Proposal 43.

PROPOSAL 48 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.

Current Federal Regulations:

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

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

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

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal is adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bear in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for federally qualified subsistence users. Retaining this tag fee exemption is particularly important in areas where there are few vendors.

**PROPOSAL 50 – 5 AAC 84.270 Furbearer trapping.**

Lengthen the marten trapping season in Units 12, 19, 20, 21, 24 and 25 by two weeks to end March 15.

Current Federal Regulations:**Units 12, 19, 20, 21, 24, and 25 – Marten**

Marten: No limit

Nov. 1–Feb. 28.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Board will consider Proposal WP24-32 at their April 2024 meeting. This proposal, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council, requests extending the Federal marten trapping season in Units 12, 19, 20, 21, 24, and 25 from Nov. 1–Feb. 28 to Nov. 1–Mar. 15.

Impact to Federal subsistence users/wildlife: Extending the marten season will increase the opportunity for federally qualified subsistence users to trap marten under State regulations, especially since many subsistence users are still trapping lynx during this time. Subprime fur conditions during March may reduce participation during the extended season, reducing trapper effort.

Milder temperatures and more daylight in March may allow an increase in trapping effort and harvest as people would have greater access to areas farther from the roads. This may be a concern as trappers have reported more females than males get trapped in the late winter. Since this is the breeding portion of the population that is close to parturition, this would be considered additive mortality. However, much of the affected areas are very remote with little trapping pressure. Currently, with no harvest limit and the 2020 Alaska Trapper Report considering marten abundance stable (Bogle 2021), there does not appear to be a conservation concern, and impact to the marten population is expected to be minimal in most of the affected units. The exception may be the road accessible areas where trapping pressure is likely higher.

If both Proposal WP24-32 and this proposal are adopted, Federal and State season dates would remain in alignment. However, if only one of these proposals is adopted, Federal and State season dates would become misaligned, increasing regulatory complexity and confusion.

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

Rationale: This proposal would increase trapping opportunity for federally qualified subsistence users. The marten population in these units seems stable with no conservation concerns, although definitive data is lacking. Trappers are noted to self-regulate harvest of marten when populations are perceived as low, mitigating concerns for potential overharvest.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

**PROPOSAL 51 - 5 AAC 84.270. Furbearer trapping.**

Align muskrat trapping seasons with beaver trapping seasons in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C.

Current Federal Regulations:**Muskrat**

Units 19, 20A, 20B, 20C, 20D, 20F, 21, 22, 23, 24, 25, and 26—No Nov. 1- June 10. limit.

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

Impact to Federal subsistence users/wildlife: This proposal would increase trapping opportunity for federally qualified subsistence users under State regulations. It could also eliminate incidental take of muskrat in the fall when the State beaver season is open. However, OSM notes that there is no open season for beaver trapping under State regulations in Units 26B and 26C, counter to what is written in Proposal 51.

The impact to the muskrat population is uncertain. While the ‘no limit’ harvest limit suggests no conservation concerns, according to trapper questionnaires, muskrats are considered scarce in Region III (Bogle 2022). As trapping reports are voluntary, harvest information is lacking.

It would also misalign the opening dates for muskrat trapping under State and Federal regulation, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 51.

Rationale: This proposal would increase trapping opportunity for federally qualified subsistence users under State regulations. While extending the trapping season seems unlikely to create conservation concerns for muskrat in these units, more data on muskrat population and harvest pressure are needed to effectively evaluate the impacts of this proposal.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau, AK.

**PROPOSAL 59 - 5 AAC 85.045. Hunting seasons and bag limits for moose.**

Lengthen the resident only Tier II moose hunt, TM680, in Unit 19A by opening the season five days earlier.

Current Federal Regulations:**Unit 19A—Moose**

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

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

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR24-43 reviews the current closure to moose hunting on Federal public lands, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek in Unit 19A, remainder.

Additionally, Proposal WP24-24 requests splitting Unit 19A into two subunits, Unit 19A and 19E, to match the recently divided State subunits.

Impact to Federal subsistence users/wildlife: This proposal would provide an additional five days of harvest opportunity for federally qualified subsistence users under State regulations.

The Unit 19A moose population has increased over the years but remains at the lower end of the State's population goals (Seavoy 2014). The population survey in winter 2020 yielded estimates of 5,224 moose and 0.9 moose/mi² (Peirce 2022, pers. comm.). This represents a 26% increase in the population since the last survey in 2017. At the 2019 winter meeting of the Western Interior Alaska Subsistence Regional Advisory Council, the ADF&G area biologist stated that the harvestable surplus is currently 160-165 moose per year while total reported harvest is roughly 150 moose per year (WIRAC 2019). Harvest success rate for the TM680 has remained approximately 63% since 2019 (ADF&G 2022).

As harvest is closely managed through a Tier II hunt, minimal impact on the moose population is expected. While hunt success may increase due to a longer season, permit numbers could be adjusted as needed to maintain harvest within sustainable levels.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025. Given the current Federal lands closure, eligible Tier II permit holders could only hunt on Federal public lands during September if this proposal passes. Hunting during the August season would be limited to State-managed lands only.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 59.



Rationale: This proposal would increase hunting opportunity for federally qualified subsistence users hunting under State regulations. Adding five days at the beginning of the State hunting season is not likely to create any conservation concerns due to the ability to adjust permit numbers, the growing moose population, and the current harvestable surplus.

Literature Cited

ADF&G. 2022. General Harvest Reports. Alaska Department of Fish and Game.
<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed Sept 1, 2022.

Peirce, J.M. 2022. Wildlife Biologist. Personal communication: e-mail. Alaska Department of Fish and Game. McGrath, AK.

Seavoy, R.J. 2014. Units 19A, 19B, 19C, and 19D moose. Chapter 21, pages 21-1 through 21-34 [In] P. Harper and L.A. McCarthy, editors. Moose management report of survey and inventory activities 1 July 2011-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2014-6, Juneau, AK

WIRAC. 2019. Transcripts of the Western Interior Alaska Subsistence Regional Advisory Council proceedings. March 26, 2019. Fairbanks, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 63 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Change the Unit 19C registration permit moose hunt RM653, to a drawing permit for nonresidents, issue up to 20 permits, and shorten the season to September 8-17.

NOTE: OSM’s comment only applies to the resident season portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19C—Moose

<i>Unit 19C—1 antlered bull.</i>	<i>Sept. 1-20</i>
<i>Unit 19C—1 bull by State registration permit</i>	<i>Jan. 15–Feb. 15</i>

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

Impact to Federal subsistence users/wildlife: This proposal would reduce harvest opportunity for federally qualified subsistence users under State regulations. The shorter season would likely decrease harvest from this moose population.

There is limited population data for the moose population in Unit 19C. State management objectives is to maintain a minimum fall post hunt bull:cow ratio of 30 bulls:100 cows. The ratio was 29 bulls:100 cows in the 2010 composition survey. No other composition surveys have been conducted in 19C due to



unfavorable weather and other priorities (Peirce 2018). Residents, on average account for less than half of the total moose harvest in Unit 19C (ADF&G 2024).

Additionally, adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 63.

Rationale: This proposal would decrease hunting opportunity for federally qualified subsistence users hunting under State regulation. OSM does not have enough recent biological data to effectively assess whether there are conservation concerns for the Unit 19C moose population that would warrant shortening the season and reducing opportunity.

Literature Cited

ADF&G. 2024. General Harvest Reports. Alaska Department of Fish and Game.
<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed Jan 8, 2024.

Peirce, J. M. 2018. Moose management report and plan, Game Management Unit 19: 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-2018-22, Juneau, AK.

PROPOSAL 64 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

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

Change the Unit 19C moose hunts to a drawing hunt for both residents and nonresidents, and specify the number of permits available for residents, guided nonresidents, and nonguided nonresidents.

NOTE: OSM’s comment only applies to the resident permit portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19C—Moose

Unit 19C—1 antlered bull.

Sept. 1-20

Unit 19C—1 bull by State registration permit

Jan. 15–Feb. 15

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

Impact to Federal subsistence users/wildlife: This proposal would substantially curtail harvest opportunity for federally qualified subsistence users under State regulations. Currently, an unlimited number of registration permits are available, while this proposal would limit permit numbers to only 100



drawing permits. Additionally, federally qualified subsistence users would need to apply for the drawing permits in the preceding fall with no guarantee of receiving a permit.

Changing to a drawing hunt with limited permits would decrease harvest from this moose population. There is limited population data for the moose population in Unit 19C. The State management objective is to maintain a minimum fall post-hunt bull:cow ratio of 30 bulls:100 cows. The ratio was 29 bulls:100 cows in the 2010 composition survey. No other composition surveys have been conducted in 19C due to unfavorable weather and other priorities (Peirce 2018). Residents, on average account for less than half of the total moose harvest in Unit 19C (ADF&G 2024).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 63.

Rationale: While OSM opposes decreasing hunting opportunity for federally qualified subsistence users, OSM does not have enough recent biological data to effectively assess whether there are conservation concerns for the Unit 19C moose population that would warrant such a restriction in permit numbers and administration.

Literature Cited

ADF&G. 2024. General Harvest Reports. Alaska Department of Fish and Game. <https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed Jan 8, 2024.

Peirce, J. M. 2018. Moose management report and plan, Game Management Unit 19: 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-2018-22, Juneau, AK

PROPOSAL 66 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Modify the moose hunting season dates and permit requirements in Unit 19D.

Current Federal Regulations:

Unit 19D—Moose

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

Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sept. 1–30.
Dec. 1–Feb. 28.

Unit 19D, remainder—1 antlered bull Sept. 1–30.
Dec. 1–15.

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



Impact to Federal subsistence users/wildlife: This proposal would increase hunting opportunity for federally qualified subsistence users under State regulations but would eliminate the Federal subsistence priority during the existing Federal-only season of September 26-30. It would also provide additional opportunity by establishing a draw permit hunt for up to 20 cows in a portion of Unit 19D, although this opportunity would be very limited due to the small number of permits available. Adopting this proposal would also align fall State and Federal seasons, reducing regulatory complexity.

Extending the season five days may increase harvest of the Unit 19D moose population. It may have negative impacts on the Unit 19D population if bull harvest substantially increases during the five-day season extension. According to ADF&G in Proposal 67, the bull:cow ratio in Unit 19D is low at 21 bulls:100 cows. This suggests there are not many surplus bulls available for harvest. Based on the existing Unit 19D winter antlerless moose and ADF&G’s Proposal 67, the Unit 19D moose population can support some cow harvest. However, it is unclear how a fall cow season could impact the winter antlerless moose hunt and overall opportunity for federally qualified subsistence users.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 66.

Rationale: Adopting this proposal would increase opportunity for federally qualified subsistence users hunting under State regulations. OSM supports providing opportunity to harvest some cows but is neutral on whether this opportunity occurs in the fall or the winter. However, the impacts of an extended fall bull season on the moose population are uncertain. Low bull:cow ratios suggest the Unit 19D moose population cannot withstand additional bull harvest. However, harvest pressure during the extended fall season may be low enough that the Unit 19D moose population is not negatively affected.

PROPOSAL 67 - 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D—Moose

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

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

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

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



Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users. As ADF&G states in their proposal, additional harvest opportunity is available for the Unit 19D moose population. In past years, this permit has only been available in person in McGrath, Nikolai, and Takotna. If permit numbers are limited, OSM supports residents who are closest to and most dependent on the Unit 19D moose population receiving the permits.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 67.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for federally qualified subsistence users, and this moose population can withstand some additional harvest.

PROPOSAL 68 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Allow moose registration permit RM682 to be obtained online.

Current Federal Regulations:

Unit 19A—Moose

*Unit 19A, north of the Kuskokwim River, upstream from but excluding Sept. 1-5.
the George River drainage, and south of the Kuskokwim River
upstream from and including the Downey Creek drainage, not
including the Lime Village Management Area—1 antlered bull by State
registration permit available in Sleetmute and Stoney River on July 24.
Permits issued on a first come, first served basis (number of permits to
be announced annually).*

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits, Units 19A and 19E, to align with State subunit boundaries.

Impact to Federal subsistence users/wildlife: Adopting this proposal may decrease opportunity for federally qualified subsistence users most dependent on the resource by increasing competition and potentially limiting the number of permits available to them. Any resident of Alaska would be able to obtain this registration permit online rather than requiring a special trip to the area to receive a permit in person. Distributing permits in person only provides those who live within the hunt area with an advantage in acquiring permits. This method of distribution is typically used when there is a very limited harvestable surplus of the wildlife population being permitted.

The impact on the Unit 19E moose population would be minimal since ADF&G could continue adjusting the total number of permits available in response to the Unit 19E moose population status. However, as the number of permits for this hunt is limited and available on a first come-first serve basis, making them available online could disenfranchise people with slow, unreliable or no internet connections, which is often the case in small villages like Sleetmute and Stoney River. Online registration greatly increases



competition for permits, and those in nonrural areas with better, more reliable internet access have an advantage.

This proposal would also misalign State and Federal regulations, increasing regulatory complexity. However, if this proposal is adopted, Federal regulations could be corrected administratively.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 68.

Rationale: This proposal would greatly increase competition for permits, and federally qualified subsistence users may be at a disadvantage due to internet capabilities. This would likely result in reduction or elimination of hunting opportunity for users closest to and most dependent on the Unit 19E moose population.

PROPOSAL 69 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Allow hunters that hold registration moose permit RM682 in Unit 19 to be eligible to hold other moose permits in the Kuskokwim River drainage.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from but excluding Sept. 1-5. the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area—1 antlered bull by State registration permit available in Sleetmute and Stoney River on July 24. Permits issued on a first come, first served basis (number of permits to be announced annually).

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits, Units 19A and 19E, to align with State subunit boundaries.

Impact to Federal subsistence users/wildlife: This proposal would increase competition for federally qualified subsistence users during the RM682 permit hunt under both State and Federal regulations (Federal regulations also require the RM682 permit). Conservation concerns exist for this proposal, as it precludes a method of reserving harvestable animals for local residents and limiting harvest without resorting to a Tier II permit hunt. However, some users reside along hunt area boundaries. The ability to hold multiple permits for those users would increase the opportunity to meet their subsistence needs.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 69

Rationale: This proposal would increase competition for *some* federally qualified subsistence users, while increasing opportunity for other federally qualified subsistence users. Conservation concerns exist



for this proposal, as it precludes a method of reserving harvestable animals for local residents and limiting harvest without resorting to a Tier II permit hunt. However, some users reside along hunt area boundaries. The ability to hold multiple permits for those users would increase the opportunity to meet their subsistence needs.

PROPOSAL 70 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Make fifteen registration moose permits for the Unit 19E moose hunt available in Bethel.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area—1 antlered bull by State registration permit available in Sleetmute and Stony River on July 24. Permits issued on a first come, first served basis (number of permits to be announced annually). Sept. 1-5.

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits, Units 19A and 19E, to align with State subunit boundaries.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for federally qualified subsistence users most dependent on the resource by increasing competition and reducing the number of permits available to them. Permits that are restricted in this manner are intended to limit the people who receive them to people who live within the hunt area. This is typically done because there is a very limited harvestable surplus of the wildlife population being permitted. The impact on the Unit 19E moose population would be minimal, since ADF&G could continue adjusting the total number of permits available in response to the Unit 19E moose population status.

This would also misalign State and Federal regulations, increasing regulatory complexity. However, if this proposal is adopted, Federal regulations could be corrected administratively.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 70.

Rationale: This proposal would increase competition for federally qualified subsistence users and could decrease opportunity for users closest to and most dependent on the Unit 19E moose population.

**PROPOSAL 75 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during part of February and March in Unit 21E.

Current Federal Regulations:**Unit 21 – Moose**

Unit 21E - 1 moose; however, only bulls may be taken Aug. 25-Sep. 30 Aug. 25-Sept. 30.

*During the Feb. 15-Mar. 15 season, a Federal registration permit is Feb. 15-Mar. 15.
required. The permit conditions and any needed closures for the winter
season will be announced by the Innoko NWR manager after
consultation with the ADF&G area biologist and the Chairs of the
Western Interior Regional Advisory Council and the Middle Yukon Fish
and Game Advisory Committee as stipulated in a letter of delegation.
Moose may not be taken within one-half mile of the Innoko or Yukon
Rivers during the winter season*

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

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for federally qualified subsistence users and easier access to moose habitat closer to rural communities. According to ADF&G in their proposal, additional harvest opportunity is available. The 2022 population estimation was 9,300 moose, which is within population objectives, and declining twinning rates indicate that this moose population could benefit from antlerless harvest.

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

Rationale: No conservation concerns exist as the moose population in Unit 21E can support some antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits federally qualified subsistence users.

PROPOSAL 84 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years.

Current Federal Regulations:**Unit 19 – Sheep**

Sheep: 1 ram with 7/8 curl horn or larger Aug. 10–Sep. 20.



Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system.

Oct. 1–Mar. 30.

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt under State regulations would be limited to one ram every two years, decreasing their opportunity to harvest sheep. This proposal would also modify the State subsistence hunt, which would take away the opportunity of federally qualified subsistence users to harvest a 3/4 curl or smaller ram under State regulations. While not stated in the proposal, implementation of a registration permit during the early fall hunt would likely be needed to track hunter participation, limiting them to one permit every two years.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 60% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 75% in recent years (ADF&G 2022).

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

Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted, conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from the Unit 19C sheep population may exacerbate conservation concerns.

OSM also supports implementing registration permits for the Unit 19C sheep hunts, which is likely necessary to effectively implement this proposal and would also improve harvest monitoring and sheep management (see comments on Proposal 43).

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting. Presentation. ADF&G DWC. Juneau, AK. 56 pp.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

**PROPOSAL 87 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:**Unit 19 – Sheep**

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10–Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. *Oct. 1–Mar. 30.*

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 from Aug. 10-Sep. 20 under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users hunting under State regulations would be limited to a season of Aug. 15-Sep. 10, reducing their opportunity.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 60% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 75% in recent years (ADF&G 2022).

Adopting this proposal would misalign State and Federal sheep seasons in Unit 19C, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted, conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from the Unit 19C sheep population may exacerbate conservation concerns.



Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting. Presentation. ADF&G DWC. Juneau, AK. 56 pp.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

PROPOSAL 88 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change all sheep hunting in Unit 19C to archery only and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19 – Sheep

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10–Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. *Oct. 1–Mar. 30.*

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently hunt sheep with a rifle in Unit 19C under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt sheep in Unit 19C under State regulations would be restricted to harvesting with only archery equipment. This would decrease opportunity for federally qualified subsistence users under State regulations by requiring a less efficient means of harvest.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: This proposal would decrease opportunity for federally qualified subsistence users to harvest sheep under State regulations in Unit 19C. While OSM supports conservation measures for the declining



Unit 19C sheep population, OSM supports measures other than weapon restricted hunts. Weapon restricted hunts could disenfranchise federally qualified subsistence users who do not own a bow or have experience using one.

PROPOSAL 100 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear season in Unit 19E to year-round.

Current Federal Regulations:

Unit 19A–Brown bear

Unit 19A and 19B, those portions which are downstream of and including the Aniak River drainage—1 bear by State registration permit only Aug. 10 – June 30

Unit 19A, 19B remainder, and 19D–1 bear. Aug. 10 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board will consider Proposal WP24-24, which requests splitting subunit 19A into subunits 19A and 19E, at their April 2024 meeting.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional brown bear hunting opportunity for federally qualified subsistence users under State regulations.

Brown bears are distributed throughout Unit 19, with very little biological information available. Population surveys have never been done in Unit 19E (previously part of Unit 19A), and population estimates are based on areas with similar habitats (Seavoy 2015).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 100.

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users harvesting brown bears under State regulations; however, the impacts on the Unit 19E brown bear population are uncertain.

Literature Cited

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.

**PROPOSAL 103 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.**

Increase the bag limit for black bear in Units 19B and 19C.

Current Federal Regulations:**Unit 19–Black Bear**

3 bear

July 1 – June 30

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional black bear hunting opportunity for federally qualified subsistence users under State regulations.

Black bears are distributed throughout Units 19B and 19C, with very little biological information available and population estimates are based on areas with similar habitats (Barton 2021). There is no monitoring of black bear harvest numbers in Units 19B or 19C (Barton 2021). This is typically done through a harvest ticket or a sealing requirement, neither of which are required in Units 19B or 19C.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 103.

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users harvesting black bears under State regulations; however, the impacts on the Unit 19B and 19C black bear population are uncertain.

Literature cited

Barton, J. S., 2021. Black bear management report and plan, Game Management Units 19, 21A, and 21E: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-14, Juneau, AK.

PROPOSAL 104– 5 AAC 85.015. Hunting seasons and bag limits for black bear.

Remove the requirement of a general season black bear harvest ticket in Unit 19D.

Current Federal Regulations:**Unit 19–Black Bear**

3 bear

July 1 – June 30



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

Impact to Federal subsistence users/wildlife: Eliminating the harvest ticket requirement would decrease the administrative burden for federally qualified subsistence users hunting black bear under both State and Federal regulations in Unit 19D. (Federal regulations require compliance with State permit and harvest reporting requirement unless a Federal permit is required.) No impacts on the Unit 19D black bear population are expected if this proposal is adopted.

Harvest tickets and sealing requirements are used to help monitor black bear populations and track their harvests (Barton 2021). As sealing is not required for harvested black bears in Unit 19D, removing the harvest ticket requirement would eliminate the primary method of monitoring this population. However, Unit 19D is currently the only subunit in Unit 19 where a harvest ticket is required. Harvest tickets are also not required for black bears in many other units (i.e. Units 21, 22, 23, 24) across the State.

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

Rationale: There are no known conservation concerns for black bears in Unit 19D. Adopting this proposal would decrease the administrative burden for federally qualified subsistence users to harvest black bears in Unit 19D, while neighboring subunits already do not require a harvest ticket.

Literature cited

Barton, J. S., 2021. Black bear management report and plan, Game Management Units 19, 21A, and 21E: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-14, Juneau, AK.

PROPOSAL 105 – 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.

Allow brown/grizzly bears to be take over bait in Unit 21A.

Current Federal Regulations:

§ 100.26(21)(iv)(a) *You may use bait to hunt black bear April 15-June 30; and in Koyukuk Controlled Use Area, you may also use bait to hunt black bear between September 1 and September 25.*

Use of bait or scent lures to harvest brown bears in Unit 21A is not authorized under Federal subsistence regulations.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to harvest black and brown bear under State



regulations. While the proposal language is a bit unclear, OSM understands the proponent is requesting a fall black bear baiting season as well as a fall and spring brown bear baiting season in Unit 21A.

Black Bears

Black bears are distributed throughout Unit 21A, with very little biological information available and population estimates are based on areas with similar habitats (Barton 2021). There is no monitoring of black bear harvest numbers in Unit 21A (Barton 2021). This is typically done through a harvest ticket or a sealing requirement, neither are currently required in Unit 21A.

Brown Bears

Brown bears are distributed throughout Unit 21A, with very little biological information available. Population surveys have never been done in Unit 21A, and population estimates are based on areas with similar habitats (Seavoy 2015).

Total reported harvest of brown bears in Unit 21A between 2009-2013 averaged 1.4 bears per year (Seavoy 2015). It is unlikely there would be a significant impact on the brown bear population if this proposal is adopted due to very low reported harvest rates.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: There are no known conservation concerns for brown bears in Unit 21A. If this proposal is adopted, it would provide additional opportunity for federally qualified subsistence users to harvest brown bears under State regulations.

Literature Cited

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.

PROPOSAL 106 – 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 and scent lures.

Allow hunting of black and brown bear with the use of bait and scent lures in Unit 21E.

See comments on Proposal 107. This proposal as submitted does not specify a baiting season. OSM provided comments on Proposal 107, which also requests a brown bear baiting season in Unit 21E with dates specified. Also, a spring baiting season for black bear is already allowed in Unit 21E and Proposal



106 only discusses brown bear baiting seasons, so OSM does not consider this proposal to affect black bear baiting seasons.

PROPOSAL 107 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Open a fall brown/grizzly bear baiting season in Unit 21E.

Current Federal Regulations: Not applicable. Use of bait or scent lures to harvest brown bears in Unit 21E is not authorized under Federal subsistence regulations.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears under State regulations. This proposal requests both a spring and fall baiting season for brown bears. As a spring black bear baiting season is already in State regulation, adopting this proposal would enable federally qualified subsistence users to harvest both black and brown bears over bait in the spring; however, only brown bears could be harvested over bait in the fall, even though black bears might also be attracted to the bait stations.

Brown bears are distributed throughout Unit 21E, with very little biological information available. Population surveys have not been done in Unit 21E, and population estimated based on areas with similar habitats (Seavoy 2015).

Total reported harvest of brown bears in Unit 21A between 2009-2013 averaged 5 bears per year (Seavoy 2015). It is unlikely there would be a significant impact on the brown bear population if this proposal is adopted due to very low reported harvest rates.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: There are no known conservation concerns for brown bears in Unit 21E. If this proposal is adopted, it would provide additional opportunity for federally qualified subsistence users to harvest brown bears.

Literature Cited

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.



PROPOSAL 110 - 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20E.

Current Federal Regulations:

Unit 20E — Moose

Unit 20E, that portion within Yukon-Charley Rivers National Preserve - 1 bull Aug. 20-Sept. 30.

Unit 20E, that portion drained by the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage - 1 bull Aug. 20-Sept. 30.

Unit 20E, remainder - 1 bull by joint Federal/State registration permit Aug. 20-Sept. 30.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users. No impact to the moose population is expected since ADF&G states in their proposal that they do not plan on announcing an antlerless season in Unit 20E next year because the moose population has stabilized. However, maintaining the antlerless season provides flexibility in managing this population and maximizing harvest opportunity in the future when warranted.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 110.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for federally qualified subsistence users and retains a management tool that ADF&G can enact if needed. Conservation concerns are mitigated as this is a drawing permit hunt with a limited number of permits that can be adjusted or not announced annually based on population status.

PROPOSAL 120 – 5 AAC 85.020. Hunting seasons and bag limit for brown bear.

Increase the brown/grizzly bear bag limit for residents in a portion of Unit 12.

Current Federal Regulations:

Unit 12–Brown Bear

1 bear Aug. 10 – June 30

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears under State regulations and would enable hides of brown bears harvested in this area to be sold.



Brown bears are distributed throughout Unit 12, with very little biological information available. Population surveys have not been done in Unit 12, and brown bear populations are estimated based on areas with similar habitats (Wells 2021). Brown bear management objectives in Unit 12 are to manage harvests so 3-year mean harvest does not exceed 28 brown bears (of which no more than 5 can be females greater than 5-years old) per year, and includes at least 55% males in the harvest. From 2014-2018, brown bear harvest ranged from 16-26 bears/year with an average of 21 bears. Over the same time period, male bears comprised 59% of the total harvest, meeting management objectives (Wells 2021).

After take of brown bears over bait was allowed in Unit 12 under State regulations in 2012, brown bear harvest did not increase. Similarly, brown bear harvest is not expected to increase significantly if this proposal is adopted, especially because the affected hunt area is very remote and difficult to access.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: The proposal would provide additional opportunity for federally qualified subsistence users. Based on the most recent information available, there are no conservation concerns for brown bears in Unit 12. However, harvest approached management objectives according to the most recent management report available. While adoption of this proposal is not anticipated to significantly increase the number of brown bears harvested in Unit 12, even a small increase in harvest might be unsustainable. Additionally, OSM does not have enough current biological or harvest information to effectively evaluate the conservation concerns for and impacts of this proposal on this brown bear population.

Literature cited

Bentzen, T. W. 2013. Unit 12 brown bear. Pages 132–142 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2010–30 June 2012. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR2013-4, Juneau, AK.

Wells, J. J. 2021. Brown bear management report and plan, Game Management Units 12 and 20E: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-28, Juneau, AK.

PROPOSAL 121 – 5 AAC 85.020. Hunting seasons and bag limit for brown bear.

Increase the brown/grizzly bear bag limit for residents in a portion of Unit 12.

See comment for Proposal 120.

**PROPOSAL 122 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.**

Lengthen the wolf hunting season in Units 12 and 20E by approximately six weeks to end on June 15.

Current Federal Regulations:**Unit 12 – Wolf Hunting**

Unit 12—10 wolves

Aug. 10–Apr. 30.

Unit 20 – Wolf Hunting

Unit 20—10 wolves

Aug. 10–Apr. 30.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users hunting wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. The existing individual hunting harvest limit of ten wolves per year (and trapping harvest limit of ‘no limit’) suggests no conservation concerns for wolves in Units 12 and 20E. According to the annual report on Intensive Management for the Fortymile Caribou Herd, wolf harvest has exhibited a slight overall decreasing trend from 2004–2022, while the wolf population appears to have remained stable (ADF&G 2023). Population management objectives are to maintain a combined 160 post-harvest wolves in both units (Gross 2021), although the spring post-harvest wolf population estimates have never been that low (ADF&G 2023). While adopting this proposal would likely increase wolf harvest, it seems unlikely to cause conservation concerns, as the wolf population estimate has always been above management objectives.

Adopting this proposal would misalign the closing date of the State and Federal wolf seasons, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to hunt wolves under State regulations. While impacts to the wolf population are uncertain, wolf numbers in Units 12 and 20E appear healthy enough to withstand more harvest.

Literature Cited

ADF&G. 2023. Annual Report on Intensive Management for Fortymile Caribou Herd with Wolf Predation Control in the Upper Yukon–Tanana Predation Control Area. Alaska Department of Fish & Game, Division of Wildlife Conservation, February 2023.



Gross, J. A. 2021. Wolf management report and plan, Game Management Units 12 and 20E: 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-2021-4, Juneau.

PROPOSAL 123 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Lengthen the wolf hunting season by approximately six weeks.

See comments for Proposal 122.

PROPOSAL 124 – 5 AAC 84.270 Furbearer trapping.

Lengthen the marten trapping season in Units 20E and 25B by two weeks to close March 15.

See comment for Proposal 50.

PROPOSAL 139 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A to four caribou per year, only one of which may be a cow.

NOTE: OSM submitted these same comments on Proposal 2 for the Western Arctic/Western Region meeting.

Current Federal Regulations:

Unit 21D—Caribou

Unit 21D, remainder— 5 caribou per day, as follows: Calves may not be taken.

*Bulls may be harvested. July 1-Oct. 14.
Feb. 1-June 30.*

Cows may be harvested. Sept. 1-Mar. 31.

Unit 22—Caribou

*Unit 22B that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River and excluding all portions of the Niukluk River drainage Oct. 1-Apr. 30.
May 1-Sept. 30, a season may be*



upstream from and including the Libby River drainage - 5 caribou per day by State registration permit. Calves may not be taken. announced.

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

Unit 22A, remainder - 5 caribou per day by State registration permit. Calves may not be taken. July 1-June 30, season may be announced.

Unit 22D, that portion in the Pilgrim River drainage - 5 caribou per day by State registration permit. Calves may not be taken. Oct. 1-Apr. 30. May 1-Sep. 30, season may be announced

Units 22C, 22D remainder, 22E remainder - 5 caribou per day by State registration permit. Calves may not be taken. July 1-June 30, season may be announced

Unit 23–Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage—5 caribou per day by State registration permit as follows:

Bulls may be harvested July 1–June 30

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

Unit 23, remainder—5 caribou per day by State registration permit as follows:

Bulls may be harvested July 1–June 30

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

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National



Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations.

Bureau of Land Management managed lands between the Noatak and Kobuk Rivers and Noatak National Preserve are closed to caribou hunting from Aug. 1-Sep. 30 for the 2022-24 regulatory cycle, except by federally qualified subsistence users hunting under these regulations.

Unit 24—Caribou

Unit 24B remainder - 5 caribou per day, as follows: Calves may not be taken.

<i>Bulls may be harvested.</i>	<i>July 1-Oct. 14.</i>
	<i>Feb. 1-June 30.</i>

<i>Cows may be harvested.</i>	<i>July 15-Apr. 30.</i>
-------------------------------	-------------------------

Units 24C, 24D - 5 caribou per day, as follows: Calves may not be taken.

<i>Bulls may be harvested.</i>	<i>July 1-Oct. 14.</i>
	<i>Feb. 1-June 30.</i>

<i>Cows may be harvested</i>	<i>Sep. 1-Mar. 31.</i>
------------------------------	------------------------

Unit 26—Caribou

Unit 26A - that portion of the Colville River drainage upstream from the Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and including the Utukok River drainage - 5 caribou per day by State registration permit as follows: Calves may not be taken



Bulls may be harvested

July 1-Oct. 14.

Dec. 6-June 30.

Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15

July 16-Mar. 15.

Noatak National Preserve is closed to caribou hunting from Aug. 1-Sep. 30 for the 2022-24 regulatory cycle, except by federally qualified subsistence users hunting under these regulations.

Unit 26A remainder - 5 caribou per day by State registration permit as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 15.

Dec. 6-June 30.

Up to 3 cows per day may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15

July 16-Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Four proposals affecting the Western Arctic Caribou Herd (WACH) will be considered by the Federal Subsistence Board in April 2024.

Proposal WP24-28 is the Federal counterpart to State Proposal 2. It was also submitted by the WACH working group and requests the same harvest limit reductions in the same units. Proposal WP24-29 requests a reduction in the caribou harvest limit in Unit 23 only to four caribou per year, only one of which may be a cow.

Proposals WP24-30 and WP24-31 request closing Federal public lands in Unit 23 to caribou hunting by non-federally qualified users from August 1 to October 31.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the individual caribou harvest limit throughout the range of the WACH would be reduced from five caribou per day to four caribou per year, only one of which may be a cow. The decreased harvest limits and more restrictive cow harvest would reduce hunting opportunity and harvest under State regulations. However, these regulatory changes could help conserve the WACH and aid in its recovery, which, in turn, could provide more hunting opportunity in the future. The Teshekpuk and Central Arctic caribou herds occupy portions of Unit 26A.

As these herds have not experienced substantial population declines like the WACH, adopting this proposal may unnecessarily restrict harvest from these herds.

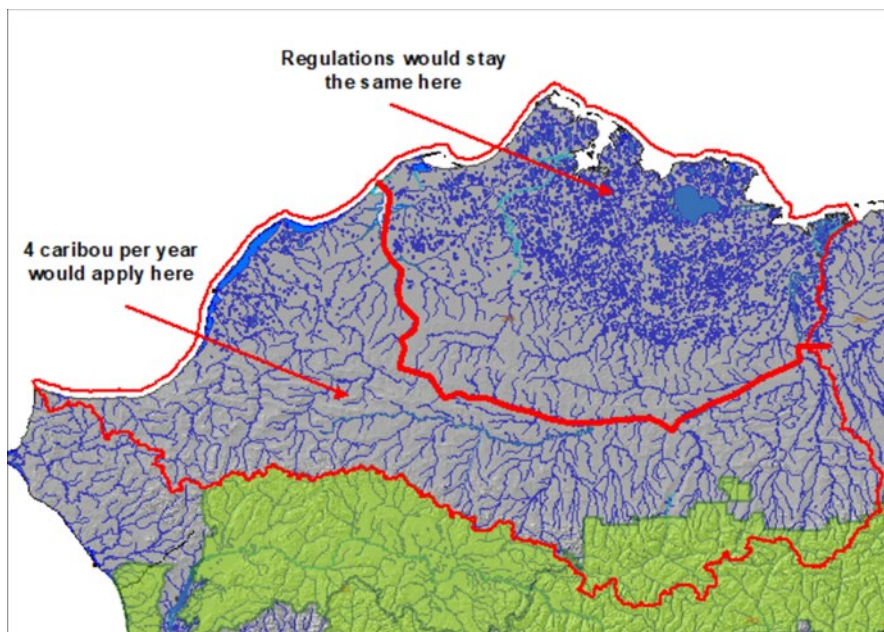
Additionally, reduced harvest limits could also impact sharing networks, which are an important cultural component for subsistence users in these areas and contribute to food security. While four caribou per year may be enough for individuals and some families (NWARAC 2022), many families and elders depend on higher harvesting households (the “super households”) to provide caribou meat (Wolfe et al. 2007).

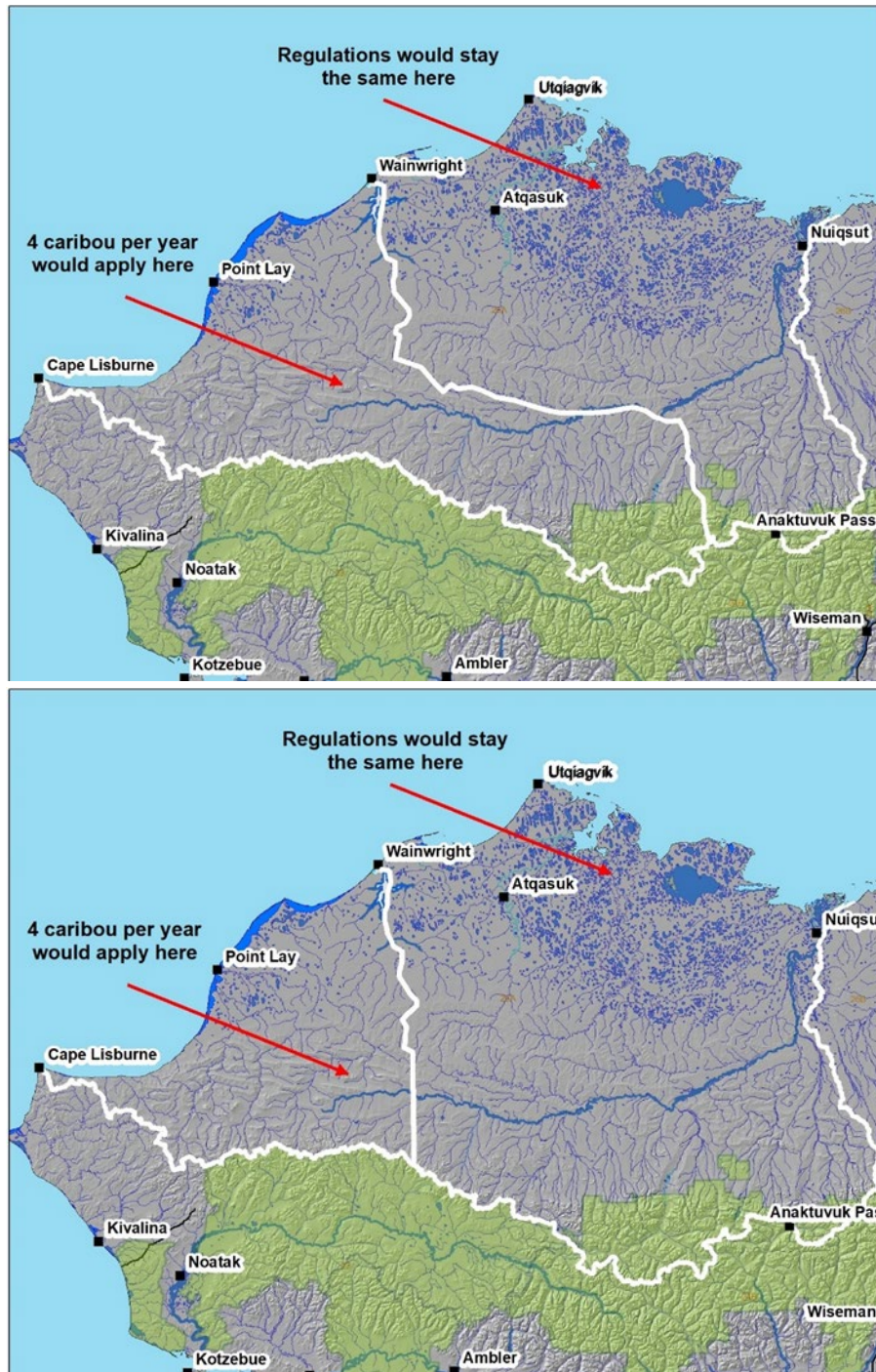
Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 2 **with modification** to exclude the eastern portion of Unit 26A from the harvest limit reductions (**Map 1**).

Rationale: OSM supports measures to reduce conservation concerns for the WACH. The lengthy and precipitous decline of the WACH warrants strong measures to aid in the recovery and conservation of this population. Current harvest rates, especially the taking of cows, could prolong or worsen the current decline, and hamper recovery efforts. Additionally, while causes of the decline are multi-faceted and uncertain, reducing human harvest is the most controllable factor.

However, reducing the individual harvest limit to four caribou per year throughout the range of the WACH may prevent some communities from meeting their subsistence needs. While OSM believes harvest reduction is necessary to conserve the WACH, OSM supports conservation measures that are workable for and supported by the affected communities and subsistence users.

This proposal, as written, may also cause unnecessary hardship and restrictions for users in the portions of the WACH range that are primarily occupied by other caribou herds that are above State population objectives and are currently not of conservation concern. Therefore, OSM supports excluding the eastern portion of Unit 26A from the harvest limit reductions, although OSM is neutral on the exact boundaries. Several examples are provided below (**Map 1**).





Map 1. Examples of the eastern portion of Unit 26A to be excluded from the individual caribou harvest limit reductions.

Literature Cited

NWARAC. 2022. Transcripts of the Northwest Arctic Subsistence Regional Advisory Council proceedings, October 31 and November 1, 2022, in Kotzebue, AK. Office of Subsistence Management, USFWS. Anchorage, AK.



Wolfe, R.J., C.L. Scott, W.E. Simeone, C.J. Utermohle, and M.C. Pete. 2007. The “Super-Household” in Alaska. Native subsistence economics. National Science Foundation, ARC 0352677. Washington DC. 31 pages.

PROPOSAL 145 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21D–Moose

Unit 21D, 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—1 moose by State registration permit Aug. 22–31. Sept. 5–25.

Antlerless moose may be taken only during Sep. 21–25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR Manager and the BLM Central Yukon Field Office Manager. Antlerless moose may be harvested during any of the winter seasons. Harvest of cow moose accompanied by calves is prohibited Mar. 1–31 season may be announced.

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

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and easier access to moose habitat closer to rural communities. Additionally, reauthorization would maintain alignment between State and Federal regulations, reducing regulatory complexity and law enforcement concerns, which is especially important in this hunt area given the checkerboard pattern of land ownership in this area.

The Unit 21D moose population has been stable, within State management objectives and can sustain limited antlerless moose harvest (Bryant 2022). The USFWS conducted surveys in 2022, indicating stable moose populations that are above the long-term average and recommended to maintain the harvest opportunity for Federally qualified subsistence users (Bryant 2022). Additionally, ADF&G states in their proposal there a harvestable surplus of cow moose in this area.

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

Rationale: No conservation concerns exist as the moose population in Unit 21D is healthy enough to sustain antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits federally qualified subsistence users.

Literature Cited

Bryant, Jenny. 2022. Moose Trend Survey Summary 2022. USFWS. Galena, AK. 34 pp.

**PROPOSAL 149 – 5 AAC 84.270. Furbearer trapping.**

Lengthen the wolf trapping season in Units 24 and the remainder of 25 by one month, to open October 1.

Current Federal Regulations:**Unit 24 – Wolf Trapping**

Wolf: No limit

Nov. 1–Apr. 30.

Unit 25 – Wolf Trapping

Wolf: No limit

Oct. 1–Apr. 30.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users trapping wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. While little is known on the status of the wolf population in this area, the lack of an individual harvest limit suggests no conservation concerns exist for wolves in Units 24 and 25. Reported wolf harvest is low but provides for sustained opportunity to engage in wolf hunting or trapping, meeting an ADF&G management goal (Caikoski 2023). Recent Alaska Trapper Reports classify the relative abundance of wolves in Region 3 as scarce or common with no change in population trend since the previous year (Bogle 2021, 2022). From 2015-2021, the number of wolves sealed in Region 3 has remained relatively stable, with an average of 500 wolves sealed per year (Bogle 2021, 2022). While extending the State trapping season by one month would likely increase wolf harvest, it seems unlikely to cause conservation concerns, as harvest has been low and any increases would likely be minimal.

Adopting this proposal would align State and Federal wolf trapping seasons in Unit 25, reducing regulatory complexity. However, it would misalign State and Federal wolf trapping seasons in Unit 24, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to trap wolves under State regulations. While impacts to the wolf population are uncertain, the limited information available indicates harvest is low and has remained stable, while the wolf population is able to support some additional harvest.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.



Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.

Caikoski, J. R. 2023. Wolf management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-25, Juneau.

PROPOSAL 150 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Lengthen the wolf hunting season in Units 24 and 25.

Current Federal Regulations:

Unit 24 – Wolf Hunting

Unit 24—15 wolves; however, no more than 5 wolves may be taken prior to Nov. 1 Aug. 10–Apr. 30.

Unit 25 – Wolf Hunting

Unit 25A—No limit Aug. 10–Apr. 30.

Unit 25, remainder—10 wolves Aug. 10–Apr. 30.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users hunting wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. While little is known on the status of the wolf population in this area, the lack of an individual harvest limit suggests no conservation concerns exist for wolves in Units 24 and 25. Reported wolf harvest is low but provides for sustained opportunity (Caikoski 2023). Recent Alaska Trapper Reports classify the relative abundance of wolves in Region 3 as scarce or common with no change in population trend since the previous year (Bogle 2021, 2022). From 2015-2021, the number of wolves sealed in Region 3 has remained relatively stable, with an average of 500 wolves sealed per year (Bogle 2021, 2022). While extending the State trapping season by one month would likely increase wolf harvest, it seems unlikely to cause conservation concerns, as harvest is considered low.

While the increase in wolf harvest resulting from this proposal may be small, the take of lactating females may result in loss of pups as well, compounding mortality and having undue effects on the wolf population (Joly, et al 2018).

Adopting this proposal would misalign the closing date of State and Federal wolf hunting seasons in these units, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.



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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to hunt wolves under State regulations. However, the impacts to the wolf population are uncertain and may be compounded by harvesting during the denning and pup rearing season, which is a sensitive time for pack cohesion and survival (Joly et al. 2018).

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.

Caikoski, J. R. 2023. Wolf management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-25, Juneau.

Joly, K., M. S. Sorum, and M. D. Cameron. 2018. Denning ecology of wolves in east-central Alaska, 1993-2017. *Arctic Institute of North America* 71(4).

PROPOSAL 151 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Increase the hunting bag limit for wolves in Units 24 and 25.

See comments for Proposal 150.

PROPOSAL 152 – 5 AAC 85.020. Seasons and bag limits for brown bear.

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

Increase the resident bag limit for brown bear in Units 24C and 24D, and open a fall bait season in Units 21B and 24B.

Current Federal Regulations: Use of bait or scent lures to harvest brown bears in Units 21B and 24B is not authorized under Federal subsistence regulations.

Unit 24–Brown Bear

Unit 24B, that portion within Gates of the Arctic National Park—2 bears by State registration permit Aug. 10 – June 30

Unit 24 remainder—1 bear by State registration permit Aug. 10 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No. In 2022, the Federal Subsistence Board adopted Proposal WP22-46 to increase the harvest limit for brown bears in Unit 24B, that portion within Gates of the Arctic National Park to 2 bears by State registration permit.



Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears under State regulations and would enable the hides of brown bears harvested in Units 24C and 24D to be sold.

Unit 21

The brown bear population of Unit 21 is estimated to be 350-400 bears, with Unit 21A estimated to only have 50 bears (Longson 2021). The average brown bear harvest in Unit 21 during regulatory years 2014-2018 was 24 bears (**Table 1**) (Longson 2021). Based on data from other areas of Interior Alaska, the minimum sustainable harvest rate for brown bears is 5-6% of the population. This indicates a minimum annual harvest rate for Unit 21 being 18-24 brown bears, indicating no additional bears are available for harvest (Longson 2021).

Table 1. Harvest information for brown bears in Unit 21. The reported harvest in Unit 21 is only in 21B, 21C, and 21D (Longson 2021).

Regulatory Year	Unit 21 Reported Harvest	Unit 21 Unreported Estimated Harvest	Unit 21 Total Bears Harvested
2014	8	10	18
2015	11	10	21
2016	16	10	26
2017	18	10	28
2018	17	10	27

Unit 24

Brown bears are distributed throughout Units 24B, 24C, and 24D, with very little biological information available and population estimates are based on areas with similar habitats (Longson 2021). The estimated brown bear population is 450 in the northern portion of Unit 24 and 180-320 in the southern portion of Unit 24 (Schmidt 2021). As the sustainable harvest rate is estimated at 5-6% of the population, 39-56 bears could be harvested sustainably from Unit 24. However, the average brown bear harvest in Unit 24 during regulatory years 2014-2018 was 21 bears (**Table 2**), indicating additional bears are available harvest (Longson 2021).



Table 2. Harvest information for brown bears in Unit 24 and the three applicable subunits (Longson 2021).

Regulatory Year	Unit 24 Reported Harvest	Unit 24 Unreported/Illegal Estimated Harvest	Unit 24 Total Bears Harvested	Unit 24B Bears Harvested	Unit 24C Bears Harvested	Unit 24D Bears Harvested
2014	19	5	25	8	0	3
2015	19	5	24	5	0	1
2016	17	5	23	3	0	0
2017	12	5	17	1	0	0
2018	13	5	18	7	0	0

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 152 **with modification** to only adopt the Unit 24 portion of the proposal.

Rationale: There is currently no conservation concern for brown bears in Units 24B, 24C, and 24D. Based on the available information, additional brown bears may be available for harvest within these units. This would also provide more opportunity for federally qualified subsistence users.

There is currently no conservation concern for brown bears in Unit 21. However, the harvest objective is consistently met in Unit 21 and no additional bears appear available for harvest. Unit 21B has an estimated low density of bears and providing a more efficient means of harvest could increase harvest to unsustainable levels and have a negative impact on the population. Therefore, OSM opposes establishing a fall brown bear baiting season in Unit 21B.

Literature cited

Longson, S. M. 2021. Brown bear management report and plan, Game Management Units 21B, 21C, 21D, and 24: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-24, Juneau, AK.

Schmidt, Joshua, H., H.L. Robison, L.S. Parrett, T.S. Gorn, B.S. Shults. 2021. Brown Bear Density and Estimated Harvest Rates in Northwestern Alaska. *The Journal of Wildlife Management* 85(2):202–214; 2021; DOI: 10.1002/jwmg.21990



PROPOSAL 153 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine. 5 AAC 84.270.
Furbearer trapping.

Lengthen the wolverine hunting and trapping seasons in Unit 21 by one month to end on April 30.

Current Federal Regulations:

Unit 21–Wolverine Hunting

Wolverine: 1 wolverine

Sept. 1–Mar. 31.

Unit 21–Wolverine Trapping

Wolverine: No limit

Nov. 1–Mar. 31.

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

Impact to Federal subsistence users/wildlife: Extending the wolverine hunting and trapping season will provide federally qualified subsistence users more harvest opportunity under State regulations. Changing weather patterns and late springs have allowed access and reportedly kept fur in prime condition later in the season.

Little is known about the Unit 21 wolverine population as they are difficult to study. Most information regarding wolverines comes from sealing records and the annual trapper questionnaire, which in 2021 had a reporting rate of only 6.7% in Region 3. The relative abundance of wolverines was reported as scarce but with no change in population trend. Using harvest as an index for population, sealing records show harvest has remained stable since RY2016, indicating the wolverine population has also remained stable (Bogle 2022). OSM has some reservations over the possibility of trapping lactating females with kits during April, which could have a disproportionate impact on the wolverine population. However, any increases in harvest resulting from this proposal are expected to be small due to the remoteness of Unit 21 and likely low harvest pressure throughout the unit.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: No conservation concerns appear to exist for the Unit 21 wolverine population as harvest has remained stable. However, an April season could result in higher mortality of females with kits. Also, the additional opportunity to harvest wolverine later in the season under State regulations benefits federally qualified subsistence users.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.



PROPOSAL 154 - 5 AAC 85.025 Hunting seasons and bag limit for caribou.

Change the bag limit for caribou in the Remainder of Unit 26B.

Note: OSM’s comment only applies to the resident hunt portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 26B—Caribou

Unit 26B, that portion south of 69°30' N lat. and west of the Dalton Highway—5 caribou per day as follows:

<i>Bulls may be harvested</i>	<i>July 1–Oct. 14.</i>
	<i>Dec. 10–June 30.</i>
<i>Cows may be harvested</i>	<i>July 1–Apr. 30.</i>

Unit 26B remainder—5 caribou per day as follows:

<i>Bulls may be harvested</i>	<i>July 1–June 30.</i>
<i>Cows may be harvested</i>	<i>July 1–May 15.</i>

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

Impact to Federal subsistence users/wildlife: This proposal would increase hunting opportunity for federally qualified subsistence users under State regulations. This may be particularly beneficial due to the decline of the Western Arctic Caribou Herd, although the far distance to travel may be prohibitive for many users.

Increasing the bag limit and removing the bull restriction will increase cow harvest and overall caribou harvest. However, no negative impacts to the Central Arctic Herd (CAH) are expected due to current population levels that are above objectives and can withstand additional harvest. Historically, harvest has shown to have little effect on this caribou population but harvesting a few cows could help slow the growth of this herd.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 154.

Rationale: This proposal would increase harvest opportunity for federally qualified subsistence users under State regulations. There is currently a harvestable surplus of cow caribou available. This proposal would allow the opportunity to harvest those surplus animals and help to slow the growth of this herd.



OSM supports the suggestion in Proposal 155 of allowing ADF&G to implement a “cow quota” in the future if necessary. This would be a safeguard to help prevent the population swings and crashes and subsequent hunting restrictions that occurred in 2016 and 2017.

PROPOSAL 155 - 5 AAC 85.025 Hunting seasons and bag limit for caribou.

Increase resident caribou hunting opportunity in Unit 26B Remainder.

See comments for Proposal 154.

PROPOSAL 157 – 5 AAC 85.050. Hunting seasons and beg limit for muskoxen.

Change the Unit 26A and Unit 26B muskox hunt area boundaries to match federal hunt boundaries and expand the state hunt areas.

NOTE: OSM submitted these same comments on Proposal 35 for the Western Arctic/Western Region meeting.

Current Federal Regulations:

Unit 26A—Muskox

Unit 26A—that portion west of the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155°00' W longitude south to the Unit 26A border—1 muskox by Federal drawing permit Aug. 1-Mar. 15

Unit 26A remainder and Unit 26B No open season

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board adopted Proposal WP22-55 in 2022, which established the Federal muskox hunt in the western portion of Unit 26A and associated hunt area boundary.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional muskox hunting opportunity for federally qualified subsistence users under State regulations. Currently, there is ‘no open season’ for muskox in Unit 26A remainder. This proposal would eliminate the current Unit 26A remainder hunt area by expanding the eastern and western hunt areas, which both have a Tier II muskox hunt. This proposed boundary provides a well-known landscape feature that is easy to identify by users (NSRAC 2021).

This proposal would have minimal impact on the muskox population, which is closely managed under a Tier II permitting system. The muskox population has increased in the western portion of Unit 26A from



253 in 2016 to 455 in 2020 (NSRAC 2021). The muskox population has increased in the eastern portion of Unit 26A and Unit 26B above management objectives (NSRAC 2021), and the State issued RY 2023/24 Tier II permits (TX108) for the first time since 2005 (ADF&G 2023).

Adopting this proposal would align the Federal and State hunt area boundaries for muskox in Unit 26A, which could reduce regulatory complexity and confusion. The Federal Subsistence Board adopted Proposal WP22-55 in 2022, which established the Federal muskox hunt and hunt area boundaries in Unit 26A to accommodate subsistence users. The TX108 hunt area is part of the Federal Unit 26A remainder hunt area. If the Board of Game adopts Proposal 35, OSM strongly encourages the State to identify the expanded TX108 hunt area as Unit 26A remainder to align with the Federal hunt area. If the TX109 hunt area is identified as Unit 26A remainder under State regulations, that would be opposite the Federal hunt area descriptors, which would greatly increase regulatory complexity and confusion.

Federal Position/Recommended Action: The OSM recommendation is **support** Proposal 35.

Rationale: This proposal poses no conservation concerns, would increase opportunity for federally qualified subsistence users, and aligns State and Federal hunt areas. OSM recommends the expanded TX108 hunt area to become Unit 26A remainder (not TX109), so that Federal and State hunt area descriptors match.

Literature Cited

ADF&G. 2023. General Harvest Reports.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup&MSG=No%20records%20match%20your%20search%20criteria%2E>. Retrieved: November 2, 2023.

NSRAC. 2021. Transcripts of the North Slope Subsistence Regional Advisory Council proceedings. November 3, 2021. Utqiagvik, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 163 - 5 AAC 92.220. Salvage of game meat, furs, and hides.

Align salvage requirements for caribou in Units 25B, 25C, and 25D with Unit 25A to require meat of caribou remain on the bone when harvested prior to October 1.

Current Federal Regulations:

100.26(h) Removing harvest from the field

(4) You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 25 until you remove the meat from the field or process it for human consumption.

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



Impact to Federal subsistence users/wildlife: It may take longer for federally qualified subsistence users to pack out caribou due to heavier loads and potentially, multiple trips. Warmer temperatures prior to Oct. 1 contribute to meat spoilage. Keeping the meat on the bone reduces spoilage and would make State regulations throughout Unit 25 consistent. Colder temperatures after Oct. 1 reduce the chance of meat spoilage.

There would be no impact on the caribou in Units 25B, 25C and 25D as the animals will have already been harvested. Adopting this proposal would also align State and Federal caribou salvage requirements in Unit 25, reducing regulatory complexity.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 163

Rationale: This proposal would reduce meat spoilage and potential wastage issues. It would also reduce regulatory complexity.

PROPOSAL 168 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the Unit 26B brown bear hunting seasons within the Dalton Highway Corridor Management Area for residents and nonresidents.

Note: These comments only apply to the resident season. OSM has no position on the nonresident season.

Current Federal Regulations:

Unit 26B–Brown Bear

1 bear

Jan. 1 – Dec. 31

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

Impact to Federal subsistence users/wildlife: If adopted, the resident portion of this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears in Unit 26B under State regulations.

From 2014-2018, the brown bear population in Unit 26B was conservatively estimated to be about 333 bears, with 78 of those bears being in the northern portion of Unit 26B and 255 bears in the southern portion (Lenart 2021). The Unit 26B brown bear harvest management objective is to manage for a 3-year mean annual human caused brown bear mortality of $\leq 8\%$ of brown bears being ≥ 2 years old, of which no more than 40% are females (Lenart 2021).

The calculated allowable harvest for brown bears in Unit 26B is approximately 27 bears (8% of 333 bears). From 2010-2018, harvest has ranged from 7-26 brown bears annually, and the maximum sustainable harvest was approached twice since 2010 (**Table 1**, Lenart 2021).



Table 1. Unit 26B brown bear harvest numbers for Alaska residents and the total harvested from 2010-2018 (Lenart 2021).

Year	Alaska Resident	Total
2010	20	26
2011	16	22
2012	15	18
2013	20	22
2014	16	18
2015	20	24
2016	10	12
2017	6	7
2018	12	15

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

Rationale: This proposal would increase opportunity for federally qualified subsistence users, and there is currently no conservation concern for brown bears in Unit 26B. However, it is unknown what the impact of this proposal could be on the Unit 26B brown bear population. Brown bear harvest has ranged widely since 2010, approaching the harvestable surplus in some years, and population estimates are outdated and imprecise. This proposal might result in the annual harvest of brown bears exceeding the harvestable surplus.

Literature cited

Lenart, E. A. 2021. Brown bear management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-17, Juneau, AK.

PROPOSAL 170 – 5 AAC 84.270. Furbearer trapping.

Lengthen the wolverine trapping season in Unit 25A by two weeks to close on April 15.

Current Federal Regulations:

Unit 25–Wolverine Trapping

Unit 25C—No limit

Nov. 1–Mar. 31.

Unit 25, remainder—No limit

Nov. 1–Mar. 31.

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



Impact to Federal subsistence users/wildlife:

Extending the wolverine hunting and trapping season will provide federally qualified subsistence users more harvest opportunity under State regulations. Changing weather patterns and late springs have allowed access and reportedly kept fur in prime condition later in the season.

Little is known about the Unit 25A wolverine population as they are difficult to study. Most information regarding wolverines comes from sealing records and the annual trapper questionnaire, which in 2021 had a reporting rate of only 6.7% in Region 3. The relative abundance of wolverines was reported as scarce but with no change in population trend. Using harvest as an index for population, sealing records show harvest has remained stable since RY2016, indicating the wolverine population has also remained stable (Bogle 2022). OSM has some reservations over the possibility of trapping lactating females with kits during April, which could have a disproportionate impact on the wolverine population. Any increases in harvest resulting from this proposal are expected to be small due to the remoteness of Unit 25A and likely low harvest pressure throughout the unit.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: No conservation concerns appear to exist for the Unit 25 wolverine population as harvest has remained stable. However, an April season could result in higher mortality of females with kits. Also, the additional opportunity to harvest wolverine later in the season under State regulations benefits federally qualified subsistence users.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

PROPOSAL 171 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F and 25C.

Current Federal Regulations:

Unit 20—Moose

Unit 20A—1 antlered bull.

Sept. 1–20.

Unit 20B—1 antlered bull

Sept. 1–20.



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

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

Unit 20F, that portion within the Dalton Highway Corridor Management Area—1 antlered bull by Federal registration permit only Sept. 1–25

Unit 20F, remainder—1 antlered bull Sept. 1–30.
Dec. 1–10.

Unit 25C—Moose

Unit 25C—1 antlered bull Aug. 20–Sept. 30.

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

Impact to Federal subsistence users/wildlife: This proposal would increase the regulatory burden on federally qualified subsistence users by requiring them to obtain a registration permit. However, the data provided if this proposal was adopted would be extremely useful in tracking harvest of moose, including determining if overharvest is occurring. This would allow ADF&G to collect more reliable harvest and effort data and help maximize moose hunting opportunity and harvest. This proposal would also allow for increased management flexibility and quicker responses to changing conditions by allowing for more responsive management action via improved harvest monitoring.

However, federally qualified subsistence users could still harvest moose on Federal public lands with only a harvest ticket under Federal regulations if this proposal was adopted. Due to the mix of State and Federal public lands within these units, in order for this proposal to be truly effective, a similar proposal would need to be adopted by the Federal Subsistence Board. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 171

Rationale: This proposal would aid in the conservation and management of a vital subsistence resource while helping to maximize moose hunting opportunity and harvest.



PROPOSAL 182 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear season in Units 20A, 20B, and 25C for residents and nonresidents by two weeks to close on June 15.

Note: These comments only apply to the resident season. OSM has no position on the nonresident season.

Current Federal Regulations:

Unit 20–Brown Bear

Unit 20A—1 bear *Sept. 1 – May 31*

Unit 20 remainder—1 bear *Sept. 1 – May 31*

Unit 25–Brown Bear

Unit 25C—1 bear *Sept. 1 – May 31*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to harvest brown bears in Units 20A, 20B, and 25C under State regulations. It would also likely increase brown bear harvests in these units, particularly over bait.

Readily available information for brown bears in these subunits is sparse and very outdated. However, in regulatory years (RY) 2009-11, the mountainous portion of Unit 20A with high densities of brown bear well exceeded the human-caused mortality objective of $\leq 8\%$ of the bears ≥ 2 years old, with a human-caused mortality of 16-20% in regulatory years (RY) 2009-11 (Young 2013). The second portion of Unit 20A, referenced as the flats, has low densities of brown bears, and appears to be a location for emigration from the higher density areas (Young 2013). This area has met the human-caused mortality objective of ≤ 3 bears of the bears ≥ 2 years old in RY2009-11 (Young 2013). Overall Unit 20A is exceeding its human caused mortality objective and not meeting the objective for the mean portion of harvest to be $\geq 55\%$ male brown bear (Young 2013).

Unit 20B has objectives for the eastern portion for a 3-year mean human caused mortality of 6 bears ≥ 2 years old (Young 2013). This objective was exceeded in RY 2011-13 with 8 bears ≥ 2 years old. The western portion of Unit 20B has a 3-year mean human caused mortality of ≤ 3 bears that are ≥ 2 years old. This management objective was met in RY2011-2013 with a 3-year mean human caused mortality of 1.7 bears (Young 2013).



Unit 25C has a medium density of brown bears. This area has roads and trails throughout providing easy access for hunters but has maintained brown bear harvest below management objectives. The primary harvest of brown bears in this area is incidental to moose and caribou harvest (Young 2013). This area has been below the human-caused mortality objective of ≤ 6 bears of the bears ≥ 2 years old in RY2009-11 (Young 2013).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: Currently, no conservation concerns exist for brown bears in Units 20A, 20B, and 25C. Based on currently available information, the human caused mortality objectives were being met or exceeded across all three subunits. Increasing the harvest of brown bears in Units 20A, 20B, and 25C may not be sustainable for these brown bear populations. OSM does not have enough current biological or harvest information to effectively evaluate the conservation concerns for and impacts of this proposal on these brown bear populations.

Literature cited

Young Jr., D. D. 2013. Units 20A, 20B, 20C, 20F, and 25C brown bear. Pages 215–232 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2010–30 June 2012. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2013-4, Juneau, AK.

PROPOSAL 183 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear hunting season in Unit 20A by two weeks to close on June 15.

See comment on proposal 182.

PROPOSAL 184 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear hunting season in Unit 20A by three weeks to open August 10.

See comment on proposal 182.

PROPOSAL 185 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Extend the brown/grizzly bear hunting season in Unit 20A and Unit 20B remainder to close on June 30, to align with the rest of Unit 20.

See comment on proposal 182.

**PROPOSAL 187 – 5 AAC 84.270. Furbearer trapping.**

Lengthen the wolverine trapping season in Units 20A, 20B, 20D, and 20F by two weeks to align with 20C.

Current Federal Regulations:**Unit 20–Wolverine Trapping**

Wolverine: No limit

Nov. 1–Feb. 28.

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

Impact to Federal subsistence users/wildlife: Extending the season in Unit 20C, remainder will allow federally qualified subsistence users trapping wolverine under State regulations more harvest opportunity. Changing weather patterns has allowed for more access later in the season and has reportedly kept fur in the prime for longer times.

Little is known about the wolverine population in this region as they are difficult to study. Most information regarding wolverines comes from sealing records and the annual trapper questionnaire, which in 2021 had a reporting rate of only 6.7% in Region 3. The relative abundance of wolverines was reported as scarce but with no change in population trend. Using harvest as an index for population, sealing records show harvest has remained stable since RY2016, indicating the wolverine population has also remained stable (Bogle 2022). As the proponent mentions, much of Unit 20C is comprised of Denali National Park where no trapping occurs under State regulations, and most of the unit is very remote and likely receives little trapping pressure.

Adopting this proposal would misalign State and Federal wolverine trapping season dates in Unit 20C, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: No conservation concerns appear to exist as the wolverine population in Unit 20C has produced stable harvest recently. Also, the additional opportunity to harvest wolverine later in the season under State regulations benefits federally qualified subsistence users.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.



PROPOSAL 189 – 5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

See comments for Proposal 48.

PROPOSAL 190 – 5 AAC 92. 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

See comments for Proposal 48.

PROPOSAL 191 – 5 AAC 85.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C–Moose

Unit 6C–1 antlerless moose by Federal drawing permit (FM0603) Sept. 1- Oct. 31 only. Permits for the portion of the antlerless moose quota not harvested in the Sept. 1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31 hunt.

Unit 6C–1 bull by Federal drawing permit (FM0601) only. Sept. 1- Dec. 31

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

Federal public lands are closed to the harvest of moose except by federally qualified users with a Federal permit for Unit 6C moose, Nov. 1 – Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No. However, in April 2024 the Board will consider Wildlife Closure Review WCR24-41, which reviews the closure to moose hunting in Unit 6C on Federal public lands by non-federally qualified users from Nov. 1 – Dec. 31.

Impact to Federal subsistence users/wildlife: The moose population in Unit 6C is cooperatively managed by the U.S. Forest Service (USFS) Cordova Ranger District and ADF&G. The strategies used



are a result of the cooperative moose management plan developed by the Prince William Sound/Copper River Delta AC, ADF&G and local residents. Part of the management plan allocates 75% of bull harvest permits to federally qualified subsistence users and the remaining 25% for people hunting under State regulations, while 100% of the antlerless moose permits are allocated to federally qualified subsistence users (OSM 2020a).

Therefore, this proposal would have a minimal effect on federally qualified subsistence users as they are allocated 100% of the antlerless moose permits under Federal regulations. As ADF&G notes in their proposal, an antlerless moose hunt has not occurred in Unit 6C under State regulations since 1999 (ADF&G 2023). Close coordination between the Federal in-season manager and ADF&G is important if this hunt ever occurs.

The Unit 6C moose population management objective is to maintain a post hunting population of 600-800. The moose population estimate for 2022/23 was 504 (Namitz 2023). This is the first time since 2010/11 that the moose population has been below the management objective.

No impact to the Unit 6C moose population is expected if this proposal is adopted due to the close management of harvest quotas and permits.

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

Rationale: Re-authorizing State antlerless moose seasons in Unit 6C provides management flexibility, although they are unlikely to be held due to current management strategies and harvest allocations.

Literature Cited

ADF&G. 2023. On-Time Public Comments Alaska Board of Game proceedings. March 17-23, 2023. <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-17-2023&meeting=kenai>. ADF&G. Juneau, AK.

Namitz, S. 2023. Chugach National Forest District Ranger. Personal communication: email. U.S. Forest Service. Cordova, AK.

OSM. 2020a. Staff analysis WCR20-41. Pages 801-813 *in* Federal Subsistence Board Meeting Materials. April 21-23, 2020. Office of Subsistence Management, USFWS. Anchorage, AK. 1455 pp.



PROPOSAL 192 – 5 AAC 85.045(a)(11). Hunting season and bag limit for moose.

Reauthorize the antlerless moose season in Unit 13A.

Current Federal Regulations:

Unit 13 Remainder–Moose

Unit 13 remainder—1 antlered bull moose by Federal registration (FMI301) only. Aug. 1 – Sept. 20

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The population objectives for moose in Unit 13A is 3,500-4,200, and all of Unit 13 is 17,000-21,400. As of 2019 the moose population in Unit 13 was 18,997 and had been within management objectives since 2007 (OSM 2020b). As mentioned by ADF&G in their proposal, the 2022 moose population estimate for Unit 13A was within management objectives at 3,621 moose.

The antlerless season in Unit 13A provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through draw permit numbers, ensuring sustainable harvests at no more than 1% of the cow population.

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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 13A and increase hunting opportunity for federally qualified subsistence users. As the number of antlerless moose permits issued in Unit 13A is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population.

Literature Cited

OSM. 2020b. Staff analysis WSA20-03. Office of Subsistence Management, USFWS. Anchorage, AK. 50 pp.



PROPOSAL 193 – 5 AAC 85.045(a)(11). Hunting season and bag limit for moose.

Reauthorize the antlerless moose season in Unit 13C.

Current Federal Regulations:

Unit 13 Remainder–Moose

Unit 13 remainder—1 antlered bull moose by Federal registration (FMI301) only. Aug. 1 – Sept. 20

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The population objectives for moose in Unit 13C is 2,000-3,000, and all of Unit 13 is 17,000-21,400. As of 2019 the moose population in Unit 13 was 18,997 and had been within management objectives since 2007 (OSM 2020b). As mentioned by ADF&G in their proposal, the Unit 13C moose population may be approaching carrying capacity, and cow harvest is necessary to help stabilize the population at more productive levels.

The antlerless season in Unit 13C provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through draw permit numbers, ensuring sustainable harvests at no more than 1% of the cow population.

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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 13C and increase hunting opportunity for federally qualified subsistence users. As the number of antlerless moose permits issued in Unit 13C is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population.

Literature Cited

OSM. 2020b. Staff analysis WSA20-03. Office of Subsistence Management, USFWS. Anchorage, AK. 50 pp.



PROPOSAL 194 – 5 AAC 85.045(a)(11). Hunting season and bag limit for moose.

Reauthorize the antlerless moose season in Unit 13E.

Current Federal Regulations:

Unit 13E–Moose

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

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The population objectives for moose in Unit 13E is 5,000-6,000, and all of Unit 13 is 17,000-21,400. As of 2019 the moose population in Unit 13 was 18,997 and had been within management objectives since 2007 (OSM 2020b). As mentioned by ADF&G in their proposal, moose abundance in Unit 13E exceed objectives, and cow harvest is necessary to help stabilize the population at more productive levels.

The antlerless season in Unit 13E provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through draw permit numbers, ensuring sustainable harvests at no more than 1% of the cow population.

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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 13E and increase hunting opportunity for federally qualified subsistence users. As the number of antlerless moose permits issued in Unit 13C is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population.

Literature Cited

OSM. 2020b. Staff analysis WSA20-03. Office of Subsistence Management, USFWS. Anchorage, AK. 50 pp



PROPOSAL 197 – 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.

NOTE: These comments only apply to Unit 7.

Current Federal Regulations:

Unit 7—Moose

Unit 7, that portion draining into Kings Bay - Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek *No open season*

Unit 7, remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only *Aug. 20 - Sep. 25*

Unit 14—Moose

No Federal regulations. *No Federal open season.*

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations and has long-term benefits for the moose population. In the Twentymile/Portage/Placer drainages, where the moose population greatly fluctuates in tandem with the weather and winter severity, antlerless hunts provide a management tool to maintain the population within desired levels. Population metrics associated with these moose have shown increases over the last several years. Because the number of antlerless permits issued for the Twentymile/Portage/Placer hunt is adjusted annually, accounting for current population metrics, there are no conservation concerns.

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

Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. Additionally, these hunts are an important management tool to keep the moose population within management objectives.

**PROPOSAL 199 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 15C.

Current Federal Regulations:**Unit 15 – Moose**

Units 15A remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 20-Sept. 25.

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

Unit 15C - 1 cow by Federal registration permit only Aug. 20-Sept. 25.

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users can already harvest cow moose with a Federal subsistence registration permit on Federal public lands during the fall in Unit 15C, although Federal public lands only comprise 28% of Unit 15C and habitat can be a limiting factor during winters with deep snow accumulations. Reauthorizing the antlerless moose season in this subunit would provide additional opportunity for Federally qualified subsistence users who can receive a State AM550 or DM549 permit to harvest an antlerless moose on State managed lands.

Antlerless moose harvest is limited by annual quotas and the number of permits available. According to ADF&G estimates, the moose population in Unit 15C is stable and within management objectives (Herreman 2022) and the moose population can withstand restricted cow harvest. Because there are such high densities of moose in the area, large snow events may concentrate moose on or near human habitats and roadways, creating negative interactions with humans. Having the flexibility to manage this moose population via drawing permit and targeted hunts allows ADF&G to maintain the moose population at sustainable levels.

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

Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. These hunts allow take of a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will also maintain management flexibility within the unit, mitigating moose-vehicle collisions and other negative moose-human interactions.



Literature Cited

Herreman, J. 2022. Moose management report and plan, Game Management Unit 15: Report period 1 July 2015-30 June 2020, and plan period 1 July 2020-30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-24, Juneau, AK.

PROPOSAL 200 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A.

Current Federal Regulations:

Unit 17A–Moose

Unit 17A—1 bull by State registration permit. *Aug. 25 – Sept. 25*
OR

1 antlerless moose by State registration permit *Aug. 25 – Sept. 25*
OR

Unit 17A—up to 2 moose; 1 antlered bull by State registration permit, *Up to a 31-day season*
1 antlerless moose by State registration permit. *may be announced*
between Dec. 1 and
the last day of Feb.

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

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The antlerless hunt in the fall and winter helps to limit the Unit 17A moose population growth and allows hunters to harvest surplus animals.

An antlerless season was opened in December 2013 in support of the Unit 17A Moose Management Plan. Under the plan, an antlerless moose hunt can be offered when the moose population is increasing, and the population reaches a minimum of 600 moose, while a two moose harvest limit is permitted when the population exceeds 1,200 moose. In March of 2017, the Unit 17A moose population estimate was 2,369 ± 564 and growing (OSM 2020c). While the 2017 population estimates are outdated, ADF&G attests in their proposal that the Unit 17A moose population is growing and can sustain additional harvest.

The antlerless season in Unit 17A provides additional opportunity for Federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through quotas (OSM 2020c).



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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 17A and increase hunting opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is in-line with the Unit 17A Moose Management Plan.

Literature Cited

OSM. 2020c. Staff analysis WP20-28/29. Pages 416-429 in Federal Subsistence Board Meeting Materials. April 21-23, 2020. Office of Subsistence Management, USFWS. Anchorage, AK. 1455 pp

PROPOSAL 207 – 5 AAC 92.990(30). Definitions.

Repeal the age criteria for full-curl horn rams for Dall sheep hunts in Interior and Eastern Arctic Region Units.

Current Federal Regulations:

§100.25(a) Definitions:

Full curl horn means the horn of a Dall sheep ram; the tip of which has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or that both horns are broken, or that the sheep is at least 8 years of age as determined by horn growth annuli.

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may harvest a full curl ram judged by any of three different methods; measuring the curl, if both horn tips are broken, and by counting annuli under Federal regulations. If this proposal is adopted, counting of horn annuli would be eliminated as a method for determining full-curl rams in Units 12, 19, 20, 24, 25, 26B and 26C under State regulations. Removing one method of determining a legal ram under a full-curl harvest limit might require additional time observing rams before harvesting, but it should not substantially impact federally qualified subsistence users' opportunity to harvest sheep under State regulations.

Sub-legal harvest of sheep has been noted during the sealing process and reported by three ADF&G offices during the 2022 season. A total of 26 out of 315 harvested sheep reported, or 8.2%, were declared sublegal during the 2022 season. This is up from the 3-4% estimated annual sublegal harvest from the 2015-2019 sheep seasons. Anecdotally reported at the time of sealing, the most common mistake leading to sublegal harvest was attributed to hunters aging sheep by annuli, of which 42% were hunters using the services of a guide (ADF&G 2022). Aging of sheep in the field, at a distance is extremely difficult and ADF&G recommends to hunters not to use this method for determining legality of a ram in their publication, *Dall Sheep Hunting: Full-curl identification guide* (Taras 2016).



Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Adopting this proposal would remove a difficult method of aging sheep in the field. All users would still be able to identify full-curl rams for harvest by either of the two remaining methods. Given the current declines in sheep populations and relatively high rate of sublegal rams harvested in 2022, removing this method would benefit sheep by helping to keep sublegal rams in the population to bolster productivity and aid in recovery of sheep populations.

OSM supports removing this method of aging sheep on a Statewide basis but recognizes that would require a follow-up proposal during the next Statewide regulatory cycle. However, given the current declines of sheep populations statewide, but particularly in Units 19C and in the Central Brooks Range, OSM urges the Board of Game to remove this method on a regional basis until it can be addressed on a Statewide level.

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting Presentation. Alaska Department of Fish and Game, Division of Wildlife Conservation.

Taras, M. 2016. Dall sheep hunting: Full-curl identification guide. 2017. Alaska Department of Fish and Game, Division of Wildlife Conservation, Fairbanks.

PROPOSAL 208 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Lengthen the RM682 moose hunting season in Unit 19E by five days.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area—1 antlered bull by State registration permit available in Sleetmute and Stoney River on July 24. Permits issued on a first come, first served basis (number of permits to be announced annually). Sept. 1-5.

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits (Units 19A and 19E) to align with State subunit boundaries.



Impact to Federal subsistence users/wildlife: Adopting this proposal would provide an additional five days of harvest opportunity under State regulations, which would increase harvest opportunities for federally qualified subsistence users. Allowing proxy hunting would also benefit federally qualified subsistence users, supporting sharing networks.

The additional harvest opportunity could also increase pressure on the moose population, hampering further growth. However, this moose population has steadily increased since 2004 and permit numbers can be adjusted annually to help keep harvest within sustainable levels. The bull:cow ratios have also been high since 2018 (40-63 bulls:100 cows), indicating surplus bulls are available for harvest (ADF&G 2023).

Adopting this proposal would misalign State and Federal seasons, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 208.

Rationale: This proposal would increase hunting opportunity for users and the moose population has continued to increase since limited hunting was opened in 2019. Permit numbers can be annually adjusted to address potential conservation concerns.

Literature Cited

ADF&G. 2023. Annual Report to the Alaska Board of Game on Intensive Management for Moose with Wolf, Black Bear, and Grizzly Bear Predation Control in Game Management Unit 19E. Alaska Department of Fish and Game. Division of Wildlife Conservation. February 2023.
https://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/2023_gmu_19e_intensive_management_annual_report.pdf Accessed January 24, 2024.



PC85

Name: Rebecca OHara

Community of Residence: Anchorage, Alaska

Comment:

I wholeheartedly and enthusiastically support Proposal 186. As a frequent visitor to Denali National Park for almost 50 years I concur that wildlife viewing is a highlight of visiting the park. I can also state that in the past 30 or so years wolves are very rarely sighted, if ever, especially near the front end of the park. In my earlier visits to the park it was not uncommon to see wolves, even from the road on the bus. This area is one small part of Alaska that is worth preserving from hunting and trapping.

Proposal 186: Support



PC86

Name: Steven O'Hara

Community of Residence: Anchorage, Alaska

Comment:

I support proposal 186. The wolves of Denali enrich the lives of the American people. It is in the national interest to preserve the wolves of Denali. It is in the national interest to preserve opportunities for the maximum number of Americans to view wolves in Denali National Park and Preserve. Nearly 600,000 visitors to the park in 2016 translates into a high probability that millions of Americans will visit the park over the coming years. Yet the likelihood that these millions of Americans will see a wolf in the park has become insignificant. In my personal experience, I have not seen a wolf in Denali for many years now, whereas in the past I saw wolves not very far into the park. I was riding a park bus when I saw the wolves. However, this has all changed, which is one of the many reasons I support proposal 186.

Proposal 186: Support



PC87

Name: Christina Owen

Community of Residence: North Pole

Comment:

Ladies and Gentlemen, let's refocus our attention on the core issues driving the impact on sheep, and more critically, consider who truly benefits from these proposed changes. Firstly, it's essential to recognize that hunters constitute only a marginal fraction of sheep harvests. Alaska needs to acknowledge that the predominant factors contributing to mature ram deaths are weather-related and predator kills. While we may not have control over the weather, empowering

guides to manage their respective areas can effectively mitigate predator threats, such as wolves and bears.

Secondly, let's scrutinize Proposal 45, revealing a self-serving agenda that prioritizes personal interests over the well-being of the sheep population. The proposition to restrict Alaska residents to one harvest ticket every four years is not only deeply troubling but also presents a stark contrast to the individuals who put forth this proposal—affording them the freedom to guide and harvest as many sheep as their bookings allow. This discrepancy raises concerns about the fairness and equity of the proposed measures.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose



PC88

Name: Connor Owen

Community of Residence: North Pole Alaska

Comment:

Ladies and Gentlemen, let's refocus our attention on the core issues driving the impact on sheep, and more critically, consider who truly benefits from these proposed changes. Firstly, it's essential to recognize that hunters constitute only a marginal fraction of sheep harvests. Alaska needs to acknowledge that the predominant factors contributing to mature ram deaths are weather-related and predator kills. While we may not have control over the weather, empowering guides to manage their respective areas can effectively mitigate predator threats, such as wolves and bears.

Secondly, let's scrutinize Proposal 45, revealing a self-serving agenda that prioritizes personal interests over the well-being of the sheep population. The proposition to restrict Alaska residents to one harvest ticket every four years is not only deeply troubling but also presents a stark contrast to the individuals who put forth this proposal—affording them the freedom to guide and harvest as many sheep as their bookings allow. This discrepancy raises concerns about the fairness and equity of the proposed measures.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose



PC89

Name: Spencer Pape

Community of Residence: Wasilla, Alaska

Comment:

To the Board of Game,

Proposal 44 & 45. I am in support of making the bag limit for both residents and nonresidents to 1 full curl ram every 4 years will be instrumental in preserving and strengthening Dall sheep and lesson the overall hunting pressure on Dall sheep. Similar to the 1 brown bear every 4 years on the Alaska peninsula and Kodiak. One might argue taking a ram every year is necessary to provide food on the table. However, based on the States overall success rate of under 25% per year. The chances of a successful harvest is already 1 in every 4 years.

Proposal 64. I am in full support of of turning the RM653 moose registration hunt within 19C into a draw area for all users. With 100 tags to residents, 14 to unguided nonresidents and 6 to guide required nonresidents. The ease of access within the area(large airstrip and ATV trails) and the way moose migrate through make it impossible to achieve the harvest goal of 70 bull moose (department biologist recommendation) a year. The registration hunt has been in place for the past 4 seasons and every year the overall harvest has been 15 to 20% above it's goal of 70 bull moose. The Board approved the proposal to make the RM653 area a draw for up to 20 nonresident tags at the meeting in Soldotna last spring. I recommend taking that proposal a step forward and making a percentage of those nonresident tags guide required. Similar to DM811, 819, 823,825 and 839 in Unit 21. The 2023 RM653 season recorded 96 bull moose taken, 16 of which were sublegal. This sublegal take is 2 to3 times the historical take for the area. By making a percentage of the tags guide required will help curb the sublegal take. Unit 19C has a deep rooted history of big game guiding. Within that, guide use area 19-09 is 75% comprised of the RM653 hunt area and private lands. I myself am a big game guide and guiding in 19-09 for the past 13 years and currently hold a guide concession on the private land within. With the closure of nonresident sheep hunting and the RM653 moose registration hunt going to a draw for nonresidents, it has destroyed the lively hood of myself and other guides that operate in the area.

Proposal 78. I support reopening a nonresident Dall sheep season in 19C. The department and studies have proved that harvesting full curl or larger Dall rams does not effect the overall population. Limiting user groups will not bring the Dall sheep population back up or any other ungulate species. Mild winter conditions, habitat improvements and predator control is key and has been proven to increase ungulate populations.

Proposal 96. I support the proposal to lengthen the grizzly bear season in unit 19C. I have witnessed a steady increase in grizzly bear population in 19-09 over the past 5 years. This increase has been detrimental to the ungulate calf survival rates within the area. Extending the season will give all user groups the liberty to harvest a grizzly while hunting for other species and decrease any defense of life or property take.

Proposal 101. I support the proposal to allow the taking of a grizzly bear over bait in the spring. Harvesting of black bears over bait is already permitted. By allowing the take of grizzly during the same period will decrease any illegal take, help maintain a healthy bear population and decrease bear predation on ungulates.

Thank you for your time, consideration of my proposals and dedication to the State of Alaska.

Proposal 44: Support
Proposal 45: Support
Proposal 48: Support
Proposal 50: Support
Proposal 52: Support
Proposal 55: Support
Proposal 57: Support
Proposal 58: Support
Proposal 60: Support
Proposal 61: Support
Proposal 62: Support
Proposal 63: Oppose
Proposal 64: Support
Proposal 65: Support
Proposal 73: Support

Proposal 76: Support
Proposal 77: Support
Proposal 78: Support
Proposal 79: Support
Proposal 80: Support
Proposal 81: Support
Proposal 82: Oppose
Proposal 83: Oppose
Proposal 84: Support
Proposal 85: Oppose
Proposal 86: Oppose
Proposal 87: Support
Proposal 88: Oppose
Proposal 91: Support
Proposal 92: Oppose

Proposal 93: Support
Proposal 94: Support
Proposal 95: Support
Proposal 96: Support
Proposal 97: Support with Amendment
Proposal 98: Support
Proposal 99: Support
Proposal 101: Support
Proposal 102: Oppose
Proposal 108: Support
Proposal 109: Support
Proposal 116: Support
Proposal 122: Support
Proposal 123: Support



PC90

Name: Shaun Patterson

Community of Residence: Fairbanks, Alaska

Comment:

I support proposal 176 that will change the regulations for out of state hunters. The Salcha River valley has seen increased pressure over the last number of years and a tightening of regulations on out of state hunters will help ease that.

Proposal 176: Support



PC91

Name: Richard Piliero

Community of Residence: Vermont

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed

information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



RESIDENT HUNTERS OF ALASKA unapologetically FOR ALASKAN RESIDENTS

Working hard to ensure our wildlife is managed sustainably with an emphasis on protecting and enhancing resident hunting opportunities!

www.residenthuntersofalaska.org

**Resident Hunters of Alaska (RHAK)
Comments to Alaska Board of Game
Region III Interior & Eastern Arctic Meeting
March 15 – 22, 2024**

Proposals we support: 82, 89, 90, 93-99, 101, 105, 106, 112, 120-121, 130, 135, 136, 144, 155, 158, 167, 169, 176, 180-185.

Proposals we oppose: 43-46, 76-81, 83-88, 91, 92, 111, 117-119, 131-134, 142, 154, 159-162, 172, 177, 186.

General Comments on Proposals

Nonresident Sheep Hunting Opportunities in Region III

RHAK’s position is that all nonresident sheep hunting in Region III should be limited via draw-only permits with a limited allocation. See our *Proposals 82, 144, & 181* that ask for these limits on nonresident sheep hunters in Units 19C, 24A & 26B, and 20A.

The Board of Game advocated for – and the state spent several hundred thousand dollars on – a previous Sheep Working Group and the Brinkman sheep survey, which reached consensus on these two recommendations to the board:

1. All nonresident sheep hunting should be limited
2. Resident sheep hunters should have a sheep hunting priority

RHAK’s position mirrors the consensus of the former Sheep Working Group and Brinkman survey.

Crowding and Conflicts among Sheep Hunters and Guides on State Lands

In 2008, the guide industry, represented by the Alaska Professional Hunters Association (APHA), made this statement: *“Currently, overcrowding of guides on State lands combined with decreasing wildlife populations is stimulating social disorder between hunter user groups and biological harm to our wildlife, which leads to establishment of the restrictive drawing permit hunts.”*

This statement came with a request to Governor Palin for \$200,000 for initial funding to work on a Guide Concession Program (GCP) that would limit guides on state lands. This solution would come with “exclusive” concessions for individual guides and was much



preferable to the guide industry than nonresident sheep hunters – their clients – being limited via draw-only hunt opportunities.

The Board of Game (BOG) fully agreed with APHA that the known problems surrounding sheep hunting on state lands were being caused by “too many guides.” Even the Big Game Commercial Services Board (BGCSB) – the body that regulates guides – said the problems were being caused by “too many guides.” And both boards, instead of using their authority to limit the number of hunters (BOG), or guides (BGCSB), said the GCP was the only solution to the known problems.

More than a million dollars was spent on a proposed GCP under the authority of the Department of Natural Resources. The state even paid for a meeting in the lower-48 for nonresident guides. But after all that money spent, and legislation introduced to authorize such a program, the legislature wanted nothing to do with approving something that was legally questionable and came with a million-dollar fiscal note to get it started. Yet the BOG and the BGCSB are still saying that a GCP is the only way to fix the known problems.

Let’s be clear: the problem was never “too many guides.” The problem is too many nonresident sheep hunters *who are required to hire a guide* being given unlimited sheep hunting opportunity by the Board of Game. The Board of Game has the authority to limit nonresident sheep hunters; they don’t have to propose new legislation to do so or spend a million dollars to figure out a solution.

Economic Considerations

Every cycle that RHAK has proposed limits on nonresident sheep hunters, the guide industry and the Board of Game have opined that we could not afford to lose the funding brought in by those nonresident sheep hunters to the Department from the sale of hunting licenses, tags, and matching federal funds. This rationale was another one of the stated reasons the board chose not to pass any of our RHAK proposals to limit nonresident sheep hunters.

At the same time, the guide industry and the Board of Game have stuck with the proposed Guide Concession Program as the only solution to the known problems addressed by APHA in 2008, which if enacted is supposed to strictly *limit* guides on state lands.

Yet, at no time has the guide industry or the Board of Game expressed any economic concerns whatsoever over a concession program on state lands that would limit guides, thereby reducing the number of their nonresident sheep-hunting clients. ***Fewer guides = fewer nonresident sheep hunters = fewer dollars going to the Department.***

Again, the problem was never too many guides; it is too many nonresident sheep hunters who are required to hire a guide being given unlimited sheep hunting opportunity by the BOG.

Reductions to Resident Sheep Hunting Opportunities

There are several proposals to reduce resident sheep hunting opportunities. We don’t support any reduction in resident sheep hunting opportunities due to conservation or other concerns unless and until the nonresident component is addressed first.



The board needs to be truthful about the current nonresident one-sheep-every-four-years regulation; ***that regulation does absolutely nothing to reduce the number of nonresident sheep hunters.*** The worldwide demand to hunt Dall sheep far exceeds the number of Dall sheep hunting opportunities guides can provide in Alaska and Canada.

Before any resident general sheep hunting opportunities can be reduced, nonresident general sheep hunting opportunity should be eliminated.

State Management Authority of our Wildlife Resources

RHAK was founded in 2016 and our mission is tied to Article 8 of our state constitution that holds our wildlife as a public trust for the common use of Alaskans. We do not want to voluntarily cede any of the authority to manage and allocate our wildlife to the federal government on any lands within the state.

However, within the Arctic National Wildlife Refuge (ANWR), where guides have exclusive concession areas, the Board of Game allows federal managers to dictate how many sheep can be taken by guided hunters within each concession area.

The way it works, a guide who applies for a concession area submits a prospectus that outlines how many sheep hunting clients he or she intends to take on, and the maximum number of sheep they may harvest. If federal managers approve, a contract is signed, that typically lasts for ten years. Federal managers are essentially allocating our sheep resource to the guides with exclusive concessions within ANWR.

What is odd is that this isn't the norm for other federal Refuge lands where guides have exclusive concessions. On those other Refuge lands, the Board of Game allocates our wildlife via draw hunts that apply to each concession area. The board doesn't let the feds determine allocations. This is the emphasis of our *Proposal 158*, which asks the board to take over the allocation of our sheep resource to guides within ANWR.

The Board of Game should put all nonresident guided sheep hunters within ANWR on draw-only hunts with a limited up-to allocation for each concession area that has sheep. The up-to number of permits can be equal to the number of sheep guided hunters are currently allowed to harvest under the guide's prospectus and contract, so that it doesn't take away any of the existing federal allocations. Then, if/when there are sheep conservation concerns, the Board of Game can make adjustments if needed to the number of permits available.

This is how it works on most all other federal Refuge lands. We see no reason why the board has allowed the feds to allocate our sheep resource to guided hunters on federal lands within ANWR, instead of that being under state management authority.

Fortymile Caribou Herd Declines & Issues

The Fortymile caribou herd has declined, and there appears to be range/habitat issues preventing a rebound of the population. With the closure of Nelchina caribou hunting due to that herd's declines, the Fortymile caribou hunt is one of the last road-accessible caribou hunts in the state that provides opportunity for residents to put food in their freezers.



The Fortymile caribou herd is an Intensive Management population recognized as important for providing food for Alaskans, with a population objective of 50,000 – 100,000 animals, and a harvest objective of 1,000 – 15,000 animals. We are well under the population objective and are not meeting the harvest objective.

In 2023, nonresident caribou hunters took 22% of the fall Fortymile caribou harvest of a declining population that is ostensibly managed to provide food for Alaskans. In looking at the harvest data, the majority of the nonresident harvest occurs along the road system, but a good chunk also comes from Zone 2 which is a fly-in only area. With the Fortymile caribou herd in trouble, we don't believe there should be any nonresident hunting allowed. But we wanted to offer a compromise that is amenable to transporters, which is the intent of our *Proposal 112*.

Proposal 112 asks to eliminate all nonresident Fortymile caribou hunting opportunities in the road accessible Zones 1, 3, & 4, but leave that opportunity open in Zone 2. This would still allow plenty of nonresident opportunity for the fly-in area, not take away from transporters who fly nonresident hunters into Zone 2 and allow for more resident harvest along the road system, where most residents hunt.

Antlerless and Any-Bull Moose Hunts

Cow hunts and any-bull hunts are coveted by Alaskans for the opportunity they provide to put food in the freezer. We don't believe that these types of hunts should be open to nonresidents.

In Unit 20B, within the Creamer's Field Refuge, and the remainder of Unit 20B within the Fairbanks management area, we allow nonresidents to participate in cow and any-bull weapons-restricted hunts. In Unit 20B drainage of the middle fork of the Chena River, and Unit 20 drainage of the Salcha River upstream from and including Goose Creek, we allow nonresidents to participate in any-bull hunts.

RHAK *Proposal 176* addresses these issues. We ask that all nonresident any-bull hunts in portions of Unit 20B on the Chena River and Salcha River upstream from and including Goose Creek revert to the same 50"/4 brow tine bag limit restrictions for nonresidents in other parts of those units.

The Creamer's Field Refuge and Fairbanks Management area weapons-restricted hunts are antlerless and any-bull hunts. These hunts really are meant for Alaskans to provide extra opportunity and prevent vehicle collisions with moose along the road system. We don't believe nonresidents should be allowed to participate in these moose hunts.

Again, antlerless/cow hunts and any-bull hunts are there to provide more opportunity for Alaskans to put food in their freezers. These types of hunts should not allow opportunity for nonresidents.



Draw Permits

Wherever we have draw permits, that means there isn't enough of that game population to provide general hunting opportunities for everyone.

We believe that residents should have an opportunity to participate in every single draw hunt opportunity in the state. But that isn't happening. So, where we do have existing draw hunts that separate out resident and nonresident hunting opportunities, our position is that nonresidents should never receive more than 10 percent of the total number of permits available.

This is the intent of our *Proposal 180*, to institute a 90/10 percent resident/nonresident permit allocation for the DC 827 caribou draw permit.

Liberalized Bear Seasons and Expanding Bear Hunting Opportunities

There are many proposals to increase the brown bear seasons in Region III. RHAK supports increased opportunity to hunt brown and black bears, as long as the Department has no conservation concerns with any subsequent increased harvest of bears.

Intensive Management Programs

RHAK supports Intensive Management predator reduction efforts to increase low moose and caribou populations that are grounded in science and efficacy.

Archery-only Hunts

RHAK opposes new special opportunity archery-only hunts unless weapons restrictions are necessary due to proximity to roads, public trails, and in urban areas. Bowhunters have plenty of opportunities already during general season hunts and existing archery-only hunts.

We should not use archery-only hunts as a way of reducing harvests for low or declining game populations due to the lower success rates of bowhunters. If there are concerns of overharvests, hunts should be draw or registration hunts with a quota and available to all hunters.

Thank you to Board members for your service and taking the time to read our comments,

Mark Richards
Executive Director Resident Hunters of Alaska (RHAK)



PC93

Name: Mark Rowenhorst

Community of Residence: Fairbanks

Comment:

Proposal 130: Oppose

This non-resident permit allocation has allowed guides some level of assurance that non-resident clients have a good chance of getting permits. Without this allocation there is no incentive for a sheep guide to use up one of their 3 Guide Use

Areas in one of the two GUA's represented in the DCUA. I think this is an important NR opportunity to maintain as it has allowed a few guides like myself to disperse guided sheep hunting pressure across more of the huntable sheep populations in the state.

As of right now there are 3 registered guides offering sheep hunts in the DCUA spread across 2 Guide Use Areas, whereas in the remainder of the central Alaska range in Unit 20A there are somewhere between 15-25 registered guides hunting sheep in 2 Guide Use Areas.

I also value my hunting rights in other states, and I believe that allocating 10% of permits to NR's is very modest and fair to the resident population.

Proposal 130: Oppose



PC94

Name: Donald Ruhoff

Community of Residence: Willow, Alaska

Comment:

My proposal 65 I would like to withdraw shorting the season. Now that have 20 non-resident draw permit in place. Let's see how it works going forward.

Sorry it for proposal 63 not 65 to withdraw shorting the season. Now that we have a non-resident 20 permit in place for 2024 and see how this works going forward. Thanks Don and Karla.

Brown bear unit 19C. Set place non-resident can hunt brown bear with out a license guide but need to be

accompanied by other licensed hunter. Must use a 300 caliber rifle or larger. If were going to try to keep this

predator control under control. I been hunting 19c for 34 years and there is a lot more brown bears then

ever before. That goes for wolves and black bears too. There been lots changes over the years to save the

moose. Shortening the season. Antler restrictions. This year non- resident draw permit.

Proposal 63: Support with Amendment

Proposal 65: Support with Amendment

Brown bear unit 19C. Set place non-resident can hunt brown bear with out a license guide but need to be accompanied by other licensed hunter. Must use a 300 caliber rifle or larger. If were going to try to keep this predator control under control. I been hunting 19c for 34 years and there is a lot more brown bears then ever before. That goes for wolves and black bears too. There been lots changes over the years to save the moose. Shortening the season. Antler restrictions. This year non- resident draw permit.



PC95

Name: Jim Sackett

Community of Residence: Fairbanks

Comment:

Regarding proposal 171, harvest reports are already required with general tags, adding additional paperwork is unnecessary.

Regarding proposal 177, increased hunting opportunity is always a good idea. I would add via amendment that crossbows be allowed during this increased archery opportunity. 37 states allow

the use of crossbow during archery season for residents over 60, Alaska should be also be allowing this.

Regarding proposal 179, the season should be September 1-25, not just a shifting of the two week season currently available.

Proposal 48: Support
Proposal 171: Oppose
Proposal 174: Support
Proposal 175: Support

*Proposal 177: Support with
Amendment*
Proposal 182: Support
Proposal 183: Support

Proposal 184: Support
Proposal 185: Support
Proposal 186: Oppose



PC96

Name: Jim Sampson

Community of Residence: Fairbanks, Alaska

Comment:

I would like to go on record in support of Proposal 176 which would limit non-resident hunters to a 50+ or 4 brow tine moose on the Salcha River, including above Goose Creek. We are seeing tremendous pressure on the Salcha river by non-resident hunters, especially above Goose Creek. In just the last four to five years, we have seen these non-resident hunting groups (many boats carrying four hunters) expand to dominate hunting in the upper Salcha above Goose Creek leaving few opportunities for Alaska resident hunters.

Thank you for your consideration.

Proposal 176: Support



PC97

Name: John Sauer

Community of Residence: Fairbanks, Alaska

Comment:

I strongly oppose proposals 43, 44, 45, 46. Harvesting legal rams has no impact on population recovery and reducing resident harvest through these restrictions is strictly a loss of opportunity for residents, benefiting guides and outfitter operations. The population of sheep is very dependent on the winter conditions. So by restricting the opportunity for residents to hunt based off the fact that we are the reason the population is down, only benefits guides and outfitters by keeping resident hunters out of there guiding area.

Proposal 43: Oppose
Proposal 44: Oppose

Proposal 45: Oppose
Proposal 46: Oppose



PC98

Name: Linda Shaw

Community of Residence: Juneau, Alaska

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem. These non-consumptive values of wolves enrich the State of Alaska in multiple ways. It is short sighted and archaic to continue to degrade the ecosystem and values of Denali National Park, a jewel of the United States and a place that Alaska should be proud of, protect and conserve.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



PC99

3/1/2024

Alaska Board of Game

RE: Proposals for Region III Board of Game meeting in Fairbanks, AK in March 2024

Proposals 186, 183-185, 60-62:

Comments by: **Paul Shearer**

[REDACTED], Healy AK [REDACTED] ([REDACTED], [REDACTED], Healy AK [REDACTED])

The purpose of this letter is to provide public comment on the following Proposals

PROPOSAL 186

5 AAC 92.510. Areas closed to hunting.

5 AAC 92.550. Areas closed to trapping.

I support this Proposal 186 and I agree the above areas should be closed to wolf hunting and trapping.

I have a residence in Healy, Alaska, that I built in 1980 and I have been a part time resident in Healy for forty four years (1980-2024). I have also lived in New Jersey and Oregon, but spend on increasing amount of my time living at my Healy residence each year.

I have over the last 44 years traveled up the Stampede road to look for wolves and bear and have taken other visiting guests up the Stampede with the same interest in wildlife viewing and the hopes of seeing wolves in the wild. The wolf sightings have been rare, but I would say that I may have seen more wolves (and tracks) the first 20 years out the stampede (1980-2000) then in the more recent 24 years (2000-2024). However we still see wolf tracks out the Stampede road and when hiking past the end of the road so I know there is wolf presence in the Stampede corridor in recent years.

The Proposal 186 closure to wolf hunting and trapping would give more opportunity for Healy residents and their guest visitors to see wolves out the Stampede, which is a much closer area to visit from Healy than traveling the 17 miles to the Denali National Park entrance and having to travel 30+ miles on the Park Road by bus before reaching good habitat for viewing wolves. I have spoken to my neighbors in Healy who are hunters and the primary game they hunt is moose and none of my neighbor hunters have shown an interest in hunting wolves and none have expressed an opinion that wolves need to be controlled in the Healy area to improve the moose hunting for local residents.

I also own land in Kantishna within the interior of Denali National Park. I have traveled extensively in that area of Denali Park and had many opportunities for viewing wolves in Kantishna both near my property (mining claims) and along the Park Road and the Alaska State Road in downtown Kantishna. It is my understanding that the Grant Creek wolf pack can extend all the way from the Stampede corridor (areas covered by Proposal 186) and out to Moose Creek in the Kantishna Hills. Therefore the closures proposed by Proposal 186 could also increase the potential for viewing wolves in Kantishna. Currently there are three active lodges in Kantishna and all of them take guests hiking and wildlife viewing to see



wolves and bear and other mammals. At peak season (pre pandemic) there could be 250 park visitors per day in Kantishna and most have come for opportunities of viewing wildlife. Therefore Proposal 186 will support those businesses and provide more park visitors the opportunity to view wolves in the wild.

In addition to supporting Proposal 186,

I also want to comment that **I do NOT support Proposals 183, 184, 185** that lengthen the hunting season for brown bear in specific areas. Again I think the local tourist economy is best served by increasing the opportunity for viewing wildlife, especially brown bear since they are more easily seen than wolves and are a high priority for most tourists that come to the area for the purpose of viewing wildlife.

Finally **I do NOT support Proposals 60-62** that would start wolf control in a portion or all of Unit 19C. Again the local neighbor hunters that I have spoken with do not think that wolf control is necessary in our local hunting areas to improve their hunting of moose, and therefore I do not think the local resident hunters support these proposals for wolf control.

Thank you for the opportunity to comment on the above Proposals being considered at the Region III Board of Game meeting in March 2024.

Respectfully submitted,

/s/ Paul Shearer

Paul Shearer

[REDACTED]
Healy, AK [REDACTED]

Residence:

[REDACTED]
Healy, AK [REDACTED]



PC100

Name: Bill Sherwonit

Community of Residence: Anchorage, Alaska

Comment:

PROPOSAL 186

I am a long-time Alaskan and resident of Anchorage writing in SUPPORT of PROPOSAL 186, which proposes that protections for wolves be reinstated on state lands in what's known as the Stampede Corridor, just outside Denali National Park, in an area that once was part of a protective "buffer" area set aside by the Alaska Board of Game (BOG) to protect wolves that venture outside the national park in pursuit of prey.

I'm among the Alaskans who believe that the BOG should honor its mandate to manage wildlife for ALL Alaskans. And many of us believe that this proposal is a reasonable request to protect wolves that leave the national park in winter during their search for food, and it will protect them during the critical time (from February until summer) when the wolves are breeding, forming family groups, and establishing territories, and the loss of a breeding wolf is most harmful to a family group/pack.

As the board is well aware, its mandate is to provide for both consumptive and non-consumptive "uses" of wildlife, including wildlife viewing, photography, and the enjoyment and appreciation of living animals in their natural habitat. There's abundant evidence that over the years, many of the wolves killed by hunters and trappers on state lands adjacent to Denali National Park are also wolves that are highly valued for their presence inside the national park, including for scientific research, and that the killing of breeding wolves on those state lands has greatly harmed the families of wolves (or packs) that spend most of their lives inside the park and which are greatly valued by park visitors, including many Alaskans.

Members of the BOG are also well aware of the issues here, so I won't repeat the many arguments in support of Proposal 186 that other Alaskans are presenting to you. I simply ask the board to take an action that would help to prevent the death of breeding wolves and disruption of families/packs in late winter and spring.

I thank you for considering my comments, and those of many other Alaskans who are asking the BOG to take a reasonable action that is long overdue and recognize the value of wolves not only to a small number of trappers and hunters, but to others who prefer to experience them alive.

Bill Sherwonit

Anchorage, Alaska

Proposal 186: Support
