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 as follows:

Make registration area RM653 into a drawing hunt area within Unit 19C for both residents and nonresidents with up to 100 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents.

Unit 19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W:

Residents – One bull - with spike-fork, 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM???** [RM653] September 1-20 or one bull - by permit available in person in McGrath and Nikolai beginning Jan 9; aircraft prohibited Jan 1-Feb 28. RM655. Feb 1-Feb 28.

Nonresidents – One bull with 50-inch antlers or antlers with four or more brow tines on at least one side **DM???** [RM653] (unguided) **or DM???** [RM653} (guided) September 1-20.

Nonresidents can only put in for one of the nonresident draws.

If nothing is done, the bull moose population will continue to be overharvested which will further depress the bull to cow ratio, the continual decline of the average width of trophy bull moose will continue and the systemic take of sub-legal bulls will never decrease, much less end. If these trends continue, the Department of Fish and Game (ADF&G) will have no choice but to implement further restrictions. Restrictions such as limiting nonresidents further, decreasing the hunting season by several days, deleting the spike/fork regulation, the creation of weapon restriction moose hunts and emergency closures or a combination of the aforementioned. Furthermore, and coincidentally the degradation and increase of trash/debris on Farewell strip and surrounding lands will continue to worsen.

What is the issue you would like the board to address and why? The first alarms are being rung about the moose population around Farewell (RM653) and I believe regulations and/or restrictions are in order. I am equally concerned about the blatant disregard shown by users of the Farewell airstrip, surrounding lands, resources, and wildlife in the area. The amount of trash, fuel drums (empty and full), and ATVs left at the taxiway and hidden in the bushes that hunters leave behind is atrocious! The Denali Highway is cleaner than Farewell airstrip. I find it extremely embarrassing, so much, that I load and offload my clients on the opposite end of the airstrip from the designated apron. The length of the Farewell airstrip, the many ATV trails that spider out from Farewell and its relatively closeness to Anchorage, make it a moose hunting magnet for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt. My predecessor started hunting the Farewell area in 1968 and described the area as the best that Alaska has to offer up until the mid-90s. I recently learned from an "old timer" that Reeve Aleutian Airways use to offer regular scheduled service to Farewell, and that people would fly there just for the day and go for a picnic! Since the influx of hunters in the 90s, my predecessor describes the month of September as "the rat race", with four wheelers zipping all around and a mentality of "if it has horns, it's going down". Over the past three decades the moose seasons have been shortened and horn restrictions put in place to maintain a healthy moose herd within the area to try to combat this practice. The registration permit area RM653 was created to achieve a more accurate grasp on the number of hunters

and moose harvested within the Farewell area. RM653 is three years old now and is made up of roughly 325 square miles with the Farewell airstrip sitting near the center of the hunt area. The registration permit area also sits near the center of guide use area 19-09, which at this time has two licensed guide/outfitters, me and one other, registered for the area according to the Big Game Commercial Services database. This 2022 season saw the highest number of permits issued to date at 201 with 106 legal bulls and eight sublegal bulls harvested. Historically, users are made up of 55% residents and 45% nonresidents with the moose harvest being about the same percentages of resident versus nonresidents. This past season saw 107 residents and 94 nonresidents, with 56 bulls harvested by residents and 50 by nonresidents, according to ADF&G. My outfit guided two nonresident moose hunters into the RM653 hunt area and harvested one bull. According to ADF&G, the bull to cow ratio is 30 to 100 in the Farewell area currently. The bottom threshold for the area is 25 to 100. In more remote inaccessible areas, the bull to cow ratio is 60-80 to 100 according to the article "Recovery of Low Bull: Cow Ratios of Moose in Interior Alaska" by Young and Boertje (2008). According to ADF&G personnel, to get the bull ratio back up, a cap needs to be put on the number of bulls harvested within the registration area and that number is 60-70 bulls per year. The passing of Proposal 205 (making the registration hunt area a draw for nonresidents with up to 100 tags given out) will not solve the problem and ensure the goal of harvesting 60-70 bulls. The most recent numbers from 2022 season saw 107 residents hunt within the registration area. Based on that number and the goal of only harvesting 60-70 bulls only allows 20 nonresident tags to be issued. Only 20 because the historical success rate for the area is 53%. Thus 127 hunters multiplied by 53% equals 67 bulls harvested. Yes, based on the historical data that achieves the harvest goal. However, I predict that the harvest will be much higher with the area being relatively small, ease of transport by ATV within the area, cutting the hunting pressure in half and the number of resident hunters continuing to increase.

A secondary concern is the multiple large camps in the registration hunt area that bring in several hunters (friends, customers, employees, etc.) September 1st through 10th, with a change out halfway through the season and another set of hunters September 11th through 20th. These large camps resemble a guiding and or outfitting operation to anyone on the outside. As noted previously, there are only two state licensed outfitter/guides that are registered to conduct big game commercial services in the hunt area.

Another area of concern is the number of sublegal bulls harvested per year. I was told by an Alaska wildlife trooper some years ago that eight to ten sublegal bulls are taken in the registration area every season. To the novice moose hunter, a 45" to 55" moose is difficult to judge at a distance, especially if it doesn't have the required brow points to make it legal. I can only assume that, with the amount of hunting competition in the area, hunters can feel pressured, or even entitled to harvest a moose, leading to shots taken when a questionable legal bull walks out. The hunter may pull the trigger to avoid watching the next hunter overharvest the questionably legal bull.

To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the registration hunt area, I suggest establishing a moose draw permit for all user groups and mirror the nonresident draw permits to the Unit 21E moose hunt regulations. Unit 21E states that nonresident applicants may only apply for DM837 (nonguided only) or DM839 (guided only), but not both. Second, meat must remain on the bones of the front quarters, hindquarters, and ribs until removed from the field or it has been processed for human consumption. This is already a requirement in Unit 19C. Third, nonresident moose hunters must complete the Nonresident Moose Hunter Orientation online at http://hunt.alaska.gov or must be accompanied in the field by an Alaska licensed guide. In accordance with the recommended harvest of 60-70 bulls and the historical user group history within the hunt area, the distribution of draw tags would be 100 tags to residents, 14 tags to nonguided nonresidents and 6 tags to guided nonresidents.

An event like what the registration hunt area is experiencing now occurred in Unit 24 and the northern section of Unit 21D along the Koyukuk River and could serve as case precedent for the registration hunt area of RM653. Obviously, Units 24 and 21D are on a much larger scale and include multiple villages, however, the percentages of moose hunters versus successful harvest, and the increase in hunting pressure over a 10-year period, is similar. In 1988 the moose harvest success rate was 60%. Eleven years later, with 731 moose hunters, the success rate had dropped to 50%. In addition to human harvest, a significant increase in the area's wolf population took place during this time that took a large toll on the overall moose herd. The Koyukuk River Moose Management Plan (KRMMP) was developed in conjunction with ADF&G Division of Wildlife Conservation and the Koyukuk River Moose Hunters' Working Group (KMWG or working group). The Alaska Board of Game (BOG) adopted regulatory proposals in the fall of 2000 that were spawned from the working group and in the 2001 spring meeting the BOG voted unanimously to support the process and endorse the KRMMP. The working group established a baseline maximum number of hunters based on moose biology concerns and what is considered a quality hunting experience. The general registration was changed to a drawing hunt with separate resident and nonresident drawing pools. Separate draws were established to retain opportunity for nonresidents and commercial guides based on user group history. The working group met after the close of the 2000 hunting season to review the regulation changes. Members of the working group all agreed that the season was greatly improved and that both local and nonlocal hunters enjoyed a higher quality hunt than in years past. A 2021 moose trend survey summary conducted by the Department of Interior Federal Subsistence Management Program through aerial survey shows a stable and healthy bull to cow moose population.

In closing, it is a supply and demand situation. The current demand for moose in the registration hunt area cannot be sustained with the current moose population and its downward trend. I understand you as the board must start somewhere and the board has by implementing a draw for nonresidents. But if the current users want to keep and maintain a 20-day season with the spike/fork, 50" and or four brow point regulation, then a cap needs to be put on the overall number of moose hunters within the hunt area.

