

# Interior and Eastern Arctic Region

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**ALASKA BOARD OF GAME**  
**Interior and Eastern Arctic Region Meeting**  
**Pike's Waterfront Lodge, Fairbanks, Alaska**  
**March 15-22, 2024**

**TENTATIVE AGENDA**

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

**Friday, March 15, 8:30 a.m.**

OPENING BUSINESS

Call to Order / Purpose of Meeting

Introductions of Board Members and Staff

Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

**THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting.** Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

**Saturday, March 16, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

**Sunday, March 17, 9:00 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

**Monday, March 18 thru Thursday, March 21, 8:30 a.m.**

BOARD DELIBERATIONS continued

**Friday, March 22, 8:30 a.m.**

BOARD DELIBERATIONS continued/conclude

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

ADJOURN

**Agenda Notes**

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



## **Regionwide & Multiple Units**

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### **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 as follows:

To address the issue of overcrowding, we propose that all general harvest ticket sheep hunts in Region III (including the youth hunt) be turned into a registration hunt. Within the registration hunt permit conditions, hunters would only be allowed to obtain the registration permit at a maximum of once every two years. Meaning, individual hunters would only be allowed to hunt sheep in Region III using the registration permit at a maximum frequency of every other year. Eligibility for draw sheep hunts would not be impacted by the registration permit, meaning hunters could obtain registration and draw permits within the same or subsequent years. Although our preference is to include all of Region III in the registration hunt, it could also be limited to just Unit 12.

We believe this solution would help reduce hunter crowding but the reduction in hunting opportunity would not impact all sheep hunters since not all hunters hunt every year. For example, of the 369 reported general harvest ticket sheep hunters in Unit 12 in fall 2021, 24% (88 hunters) also hunted sheep in Unit 12 in fall 2020.

**What is the issue you would like the board to address and why?** There is overcrowding of sheep hunters which has cascading effects on hunt quality and aesthetics. This issue of overcrowding has been amplified by the current low numbers of sheep throughout much of Region III, which has pushed more hunters into the few areas where sheep numbers remained closer to long-term averages and has increased competition for the lower number of remaining legal rams in the areas where sheep numbers are low. Furthermore, crowding will increase as a result of the recent closure of Unit 19C to youth and nonresident hunters and the closure of portions of the Brooks Range to non-federally qualified subsistence users. Although we recognize that crowding is not a biological issue, it has impacts on hunt quality and aesthetics.

Our solution to this issue is to limit individuals to hunting sheep in general harvest ticket areas at a maximum frequency of once every two years via a registration permit hunt. Although we considered alternative solutions such as shorter seasons and drawing hunts, we feel this solution would best address the issue while retaining the most available open hunting opportunity. If no action is taken, we are concerned that federal closures to non-federally qualified users may be enacted throughout more of Region III, which will have negative impacts on many sheep hunters.

**PROPOSED BY:** Upper Tanana/Fortymile Fish and Game Advisory Committee (EG-F23-225)

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## **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 as follows:

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

#### **Unit 12, 19, 20, 24, 25, 26B & 26C Sheep.**

Resident hunters: One ram with full-curl horn or larger **every two 2 regulatory years** [One ram with full curl horn larger] Harvest ticket. August 10-September 20.

**What is the issue you would like the board to address and why?** Issue: reduced Dall sheep numbers due to winter events over a large percentage of Alaska resulting in fewer available rams available for potential harvest by hunters. Fewer mature legal rams can create competition amongst hunters in the field. Competition often results in pressure to fill tags leading to unacceptable levels of sub-legal harvest. Harvesting of 8-year-old/full curl/both horns broken has been established by ADF&G professional biologists as effective to maintain the sheep populations.

Goal: maintain hunting opportunity for all hunters pursuing Dall sheep by giving incentive to harvest mature legal rams while reducing harvest and pressure on sheep, reducing competition amongst hunters, and allowing for breeding age rams to remain in the herd longer.

Solution: implement a one ram every two years for resident hunters. Nonresident hunters are already one ram every four years. This will force hunters to be more selective in taking rams lowering the number of small breeding age and sub-legal rams taken. Allowing more breeding age mature yet less than full curl rams to remain in the herd after hunting season will reduce pressure on the sheep herd while maintaining resident priority.

**PROPOSED BY:** Jeff Pralle

(EG-F23-267)

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## **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 as follows:

Implement one ram with full-curl horn or larger every four regulatory years for residents. This regulation already exists for nonresidents and as minor as it is, has made a positive impact towards the resource. As different as it is, the one brown bear every four regulatory years for both residents and nonresidents on Kodiak Island and the Alaska Peninsula has boosted the brown bear population and created the best brown bear hunting opportunity in North America. Very rarely does a brown bear hunter go home empty handed. This same regulation geared towards Dall sheep would have a major impact on the resource in a positive manner.

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

#### **Unit 12, 19, 20, 24, 25, 26B & 26C Sheep.**

Resident hunters: One ram with full-curl horn or larger **every four regulatory years** [One ram with full curl horn or larger] Harvest ticket. August 10-September 20.

If nothing is done, the pressure will continue to increase on the Dall sheep resource. Which will eventually lead the Board of Game and or the Alaska Department of Fish and Game to implement restrictions, such as shortening of the season, creation of weapons restriction hunts, limitations or closures placed on different usure groups, creation of a statewide draw and maybe even an emergency closure. Ultimately, it will lead to the loss of another Dall sheep hunting opportunity.

**What is the issue you would like the board to address and why?** It is known and documented by the Alaska Department of Fish and Game and anyone that has hunted Dall sheep in the past couple of years, that the Dall sheep population is down across the entire state. This downturn has created more pressure on the remaining harvestable population of Dall sheep rams. The 2022 season saw an alarming uptick in sub-legal harvest. Ushare group controversy and overall negative sheep hunting experiences have been expressed profusely by the public. Where there are Dall sheep, there is a noticeable presence of hunters. Which ultimately creates higher than normal hunting pressure, increased competition amongst hunters, and even in some cases hunter on hunter conflicts. In order to create an overall enjoyable hunting experience and keep Dall sheep from going to a draw statewide, and most importantly keep sheep on the mountain, a mechanism needs to be put in place to decrease the pressure on the resource, even if it's a minor one.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, Jeff Rost and Jon Burrows (EG-F23-255)

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## **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 as follows:

All sheep hunting in Units 12, 19 and 20 should be by draw permit only. Nonresidents are guaranteed 20% of the permits. 10% of the total of these nonresident permits will be issued to second degree of kindred hunters with a separate draw permit number. The nonresident permits should be issued by Guide Use Area and the number determined by the department from their counts. Nonresidents will have to apply with a guide and have a guide-client contract in place with them before they apply. Guides have to be registered for the area the year their hunters are applying and the year the hunt will occur and the guides have to have a Unique Verification Code issued by the Big Game Commercial Services Board before hunters apply. Guides will have a separate code for each guide use area.

**What is the issue you would like the board to address and why?** There has been a dramatic decline in the Dall sheep population in Units 12, 19, and 20. I think all sheep hunters should be on draw permit in these areas until the sheep population recovers to 75% of population from the last complete count done before year 2020. Once it has recovered it would then revert back to a general season open to all hunters. There is a possibility it will never reach this level again. 20% of the permits would be guaranteed to nonresidents and 10% of these permits would be issued to second-degree of kindred non-residents under a separate draw. The sheep in these areas need to be protected from over hunting which is obviously occurring with only a 50% success rate for guided nonresidents (normally 75% to 85%) and an 8% success rate for residents (normally 25-30%.) This will give the hunters that draw permits a much higher quality

hunt and rebuild the ram population faster. The nonresident permits should be divided and issued to each guide use area in the units. The number of permits in each area should be determined by the department based on their survey counts.

**PROPOSED BY:** Dan Montgomery

(EG-F23-326)

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#### **PROPOSAL 47**

##### **5 AAC 92.011 Taking of game by proxy.**

Allow proxy hunting for bison in Units 12, 19 and 20 as follows:

Allow proxy to hunt bison for anyone meeting requirements for other proxy hunts.

**What is the issue you would like the board to address and why?** I am a disabled veteran with 100% disability rating. I am wheelchair-bound and unable to shoot a rifle. In the past, I drew a bison tag, but was not allowed by ADF&G to designate a proxy to fill the tag. I believe the major benefit of filling a bison tag is the meat harvested. The possibility of doing so should not be kept from the disabled.

**PROPOSED BY:** Ivan Nance

(EG-F23-177)

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#### **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 as follows:

- (a) A resident tag is not required for taking a brown bear in the following units:

...

- (4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

...

**What is the issue you would like the board to address and why?** Brown bear tag fee exemptions must be reauthorized annually. Reauthorizing the exemption allows residents who have not purchased the \$25 brown bear tag to take bears opportunistically. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically.

Region III (Interior and Northeast Alaska) brown bear populations are healthy, and harvest is monitored through the brown bear sealing requirement. Reauthorizing all resident brown bear tag fees throughout Region III maintains simpler regulations, provides high resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization includes tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

The Department of Fish and Game estimates that brown bear harvest accounts for less than 6% of the bear population. Harvest is composed primarily of males and is sustainable. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed by adjusting seasons and bag limits. The absence of resident tag fees that were in place prior to 2010 appears to have little effect on net harvest across the region in general.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-041)  
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## **PROPOSAL 49**

### **92.044. Permits for hunting bear with the use of bait or scent lures.**

Clarify which rivers in Units 12, 19, 20, 21, 24, 25, 26B, and 26C are major rivers for the purposes of bear baiting as follows:

Clarify under bear baiting regulations what rivers in the interior are a “major river system” that would comply with that definition under 5 AAC 92.044.

**What is the issue you would like the board to address and why?** Current bear baiting regulations under 5AAC 92.044 (5)(B)(i) state that a person may not use bait or scent lures within:

“(B) one mile of a

(i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on *the opposite side of a major river system*, as identified by the department in the permit, from the bear baiting station;”

There is no definition we can find of what rivers in the interior are a “major river system.” So, bear baiters don’t know what is really legal. Certainly, the Tanana and Yukon Rivers are major river systems, but what about other interior rivers like the Salcha, Chena, Birch Creek etc.?

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (EG-F23-216)  
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## **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 as follows:

#### **5 AAC 84.270(6) Furbearer trapping. Marten.**

Extend the marten trapping season in Units 12, 19 - 21, 24, and 25 by as follows: November 1 through **March 15** [FEBRUARY 28]

**What is the issue you would like the board to address and why?** The Eastern Interior Regional Advisory Council (EIRAC) would like the board to lengthen the season end dates for marten in Units 12, 19, 20, 21, 24, and 25 until March 15 so that trappers targeting lynx during March can have concurrent opportunity to harvest marten. Currently, marten trapping season closes on the last day of February in the aforementioned units but lynx trapping season is open until March 15 in Units 12, 19A, 19B, 19E, 20, 21B, 21C, 21D, 21E, and 25 and until March 31 in Units 19C, 19D, and 21A. Many trappers target both marten and lynx, and this 15-day season extension would allow trappers the opportunity to harvest

a few additional marten.

Shifting climate patterns are causing warmer falls but pushing cold weather farther into the spring. Marten fur quality is still prime in early to mid-March. March typically has the best trail conditions for trapping. In recent years of deep snowfall, it has been difficult to access traplines in February.

EIRAC is also submitting a federal proposal during the current wildlife regulatory cycle that requests the same season extension in the same units. This proposal would align state and federal regulations if both proposals are adopted.

**PROPOSED BY:** Eastern Interior Regional Advisory Council (EIRAC) (HQ-F23-007)

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## **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 as follows:

I recommend changing the trapping season for muskrat in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C to align with (be the same as) the beaver trapping seasons in those units (i.e. from September until June) to allow for simultaneous open water trapping of these two species in the fall, winter, and spring.

**What is the issue you would like the board to address and why?** The current trapping season for muskrat in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C begins on 1 November, while the beaver trapping seasons in these areas opens in September. Beaver and muskrat are often trapped in overlapping habitats by “water trappers” who pursue them simultaneously using similar gear and equipment. Better aligning the muskrat and beaver seasons to allow for open water trapping in the fall would expand opportunity for trappers who pursue both species.

**PROPOSED BY:** Stephen Meyers (EG-F23-166)

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## **PROPOSAL 52**

### **5 AAC 92.080. Unlawful methods of taking game; exceptions.**

Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C as follows:

Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers under a trapping license in all of Region III.

5AAC 92.080(7)(C) artificial light, except that artificial light, **night vision goggles, and forward looking infrared devices** may be used

(i) for the purpose of taking furbearers under a trapping license during an open season November 1 – March 31 in Units 7 and 9-26.

**What is the issue you would like the board to address and why?** Under current regulations, hunters and trappers can only use artificial light for furbearers in Units 7 and 9 - 26. Opportunity for harvest is lost because of the short “daylight” during the winter months in the Interior and Eastern Arctic Region.

Adding the use of night vision goggles and forward looking infrared devices to the exceptions under unlawful methods would allow hunters and trappers many more hours each day besides what is defined as “daylight.” Region III has a very healthy population of furbearers, and the harvest would be sustainable and provide additional “reasonable opportunity” for harvest for personal use and subsistence.

This could be considered for a statewide proposal but we would like to use the Interior and Eastern Arctic Region as a test area. We anticipate that any additional harvest would not be a conservation issue and testing in one region before considering it statewide would provide an opportunity to look for abuses. This change would be expected to add some burden on the Alaska Wildlife Troopers.

**PROPOSED BY:** Fairbanks Fish & Game Advisory Committee (EG-F23-219)

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## **McGrath Area – Units 19, 21A and 21E**

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### **PROPOSAL 53**

#### **5 AAC 99.025. Customary and traditional uses of game populations.**

Revise the Amount Necessary for Subsistence (ANS) for moose in Unit 19 as follows:

**“5 AAC 99.025. Customary and traditional uses of game populations.** (a) The Board of Game has examined whether the game populations in the units set out in the following table, excluding those units or portions of those units within nonsubsistence areas established by the Joint Board of Fisheries and Game (5 AAC 99.015), are customarily and traditionally taken or used for subsistence and make the following findings: SPECIES & UNIT FINDING AMOUNT REASONABLY NECESSARY FOR SUBSISTENCE USES”.....

...

(8) Moose

...

Unit 19, that portion outside of the Lime Village Management Area positive 400 - 700, including 175 - 300 in Units 19(A) and 19(E), and 20 - 24 in Unit 19(B)

Unit 19, that portion within the Lime Village Management Area positive 30 – 40.

**What is the issue you would like the board to address and why?** The Central Kuskokwim Advisory Committee would like to remain in Tier II for longer to give local hunters more opportunity to meet food security means.

**PROPOSED BY:** Central Kuskokwim Fish and Game Advisory Committee (HQ-F23-029)

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### **PROPOSAL 54**

#### **5 AAC 99.025. Customary and traditional uses of game populations.**

Review the Amount Necessary for Subsistence (ANS) for moose in Unit 19 as follows:

**The Lime Village Management Area will remain 30-40 moose and Unit 19E Remainder will be included in the unit-wide ANS of 400-700 moose.**

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

- In 2006, the Board of Game (BOG) adjusted the moose Amount Necessary for Subsistence (ANS) for Unit 19A and 19B and nested it – separating it from the rest of Unit 19. This was done in an attempt to lower the ANS enough so that the existing harvestable surplus would not force western Unit 19A into a Tier II hunt. This was unsuccessful, but the ANS remained lower than it had been.
- In 2022, BOG adopted Stony Holitna Advisory Committee Proposal 171 – and split Unit 19A into two smaller subunits – Unit 19A and 19E.
- Now that Unit 19A has been split into the new Units 19A and 19E, 19E has no ANS..



- The ANS set in 2006, which was arguably low for the “old” Unit 19A, is not an unreasonable number for the “new” and smaller Unit 19A.
- ANS is usually not computed when a wildlife population is low and hunting is restricted

**PROPOSED BY:** Stony Holitna Fish and Game Advisory Committee (HQ-F23-024)

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## **PROPOSAL 55**

### **5 AAC 92.108. Identified big game prey populations and objectives.**

Establish a positive Intensive Management finding for moose in Unit 19C as follows:

Establish a positive Intensive Management (IM) finding for moose in Unit 19C.

**What is the issue you would like the board to address and why?** Establish a positive finding for Intensive Management (IM) for moose in Unit 19C.

Justification: there is documented annual moose harvest in Unit 19C of over one hundred moose.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee (EG-F23-240)

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## **PROPOSAL 56**

### **5 AAC 92.108. Identified big game prey populations and objectives.**

Create separate Intensive Management (IM) population and harvest objectives for Unit 19A, Unit 19B and Unit 19E.

...

Moose

...	Finding	Population	Harvest
<b><u>GMU 19A</u></b>	<b><u>Positive</u></b>	<b><u>x,xxx – x,xxx</u></b>	<b><u>xxx – xxx</u></b>
<b><u>GMU 19B</u></b>	<b><u>Positive</u></b>	<b><u>x,xxx – x,xxx</u></b>	<b><u>xxx – xxx</u></b>
[19(A) AND 19(B)	POSITIVE	13,500 - 16,500	750 – 950]
GMU 19(C)	Negative		
GMU 19(D)- East	Positive	6,000 - 8,000 3,000 - 3,500	400 – 600
GMU 19(D)- remainder	Positive	4,000 - 6,000	250 – 600

...

**What is the issue you would like the board to address and why?** In 2021 the board passed proposal 171 to split unit 19A into units 19A and 19E. This created several administrative errors including in 5 AAC 92.108. Currently the Intensive Management (IM) harvest and population objectives are for all of Unit 19A (which is now split into 19A and 19E) and Unit 19B, combined. This proposal creates separate IM population and harvest objectives for Unit 19A, Unit 19B and Unit 19E. The department will provide current and previous population estimates and harvest trends to assist the board in setting population and harvest objectives for the three subunits. Objectives set in this proposal will be used in the two Unit 19 Intensive Management proposals also submitted for this meeting.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-063)

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### **PROPOSAL 57**

#### **5 AAC 92.123. Intensive Management Plans VII.**

Modify the Intensive Management Plan for Unit 19 as follows:

(a) Plans established. Intensive management plans for the following areas are established in this section:

(1) Unit **19(E)** [19(A)] Predation Control Area;

(2) Unit 19(D)-East Predation Control Area.

(b) Unit **19(E)** [19(A)] Predation Control Area: the Unit **19(E)** [19(A)] Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit **19(E)** [19(A)], encompassing approximately **4,269** [9,972] square miles; this predation control program does not apply to any National Park Service or National Wildlife Refuge lands unless approved by the federal agencies; notwithstanding any other provisions in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf and black bear and brown bear population reduction or a wolf and black bear and brown bear population regulation program in Unit **19(E)** [19(A)] to benefit moose:

(1) the following Wolf and Bear Predation Control Focus Areas are established in the Unit **19(E)** [19(A)] Predation Control Area; the areas do not delineate a moose, wolf, or bear population and are not intended to distinguish animals within the focus areas from populations in Unit **19(E)** [19(A)]; the purpose is to focus wolf and bear control in a relatively small area where moose numbers can be better estimated, where moose are accessible to hunters, and where harvest can be closely monitored;

(A) the Wolf Predation Control Focus Area (WCFA) encompasses approximately 3,905 square miles within all Unit **19(E)** [19(A)] drainages of the Kuskokwim River upstream from and including the Holitna River Drainage; wolf control will be conducted only within the WCFA; the department has the discretion to adjust the focus area's size and shape to include up to approximately 4,400 square miles of Unit **19(E)** [19(A)];

(B) the Black Bear and Brown Bear Predation Control Focus Area (BCFA) encompasses approximately 534 square miles consisting of those portions of the Kuskokwim River drainage within the area enclosed by a line starting at Sleetmute at 61° 42.00' N. lat., 157° 10.00' W. long., then east to 61° 42.00' N. lat., 157° 00.00' W. long., then north to 61° 44.00' N. lat., 157° 00.00' W. long., then east to 61° 44.00' N. lat., 156° 55.00' W. long., then north to 61° 46.00' N. lat., 156° 55.00' W. long., then east to 61° 46.00' N. lat., 156° 50.00' W. long., then north to 61° 48.00' N. lat., 156° 50.00' W. long., then east to 61° 48.00' N. lat., 156° 45.00' W. long., then north to 61° 50.00' N. lat., 156° 45.00' W. long., then east to 61° 50.00' N. lat., 156° 30.00' W. long., then south to 61° 40.00' N. lat., 156° 30.00' W. long., then west to 61° 40.00' N. lat., 156° 45.00' W. long., then south to 61° 18.00' N. lat., 156° 45.00' W. long., then west to 61° 18.00' N. lat., 157° 15.00' W. long., then north to 61° 24.00' N. lat., 157° 15.00' W. long., then east to 61° 24.00' N. lat., 157° 10.00' W. long., then north to 61° 42.00' N. lat., 157° 10.00' W. long.; bear control will be conducted only within the BCFA; the department has the discretion to adjust the area's size and shape up to approximately 800 square miles of Unit 19(A); the BCFA is mostly within the WCFA;

(2) this is a continuing control program that was first authorized by the board in 2004 for wolf control, with bear control added by the board in 2012; it is currently designed to increase moose numbers and harvest in the WCFA and BCFA by reducing predation on moose and is expected to make a contribution to achieving the intensive management (IM) objectives in Unit **19(E)** [19(A)];

(3) moose, wolf, black bear, and brown bear objectives are as follows:

(A) the IM population objective established by the board for **Unit 19(E) is X,XXX – X,XXX** moose [UNITS 19(A) AND 19(B) IS 13,500 – 16,500 MOOSE; BASED ON THE RELATIVE SIZES OF THE TWO UNITS, THE PROPORTIONAL POPULATION OBJECTIVE FOR UNIT 19(A) ALONE IS 7,600 – 9,300 MOOSE]; the IM moose harvest objective for **Unit 19(E) is XXX – XXX moose annually** [UNITS 19(A) AND 19(B) IS 750 – 950 MOOSE ANNUALLY; THE PROPORTIONAL HARVEST OBJECTIVE FOR UNIT 19(A) ALONE IS 400 – 550 MOOSE ANNUALLY];

(B) the density objective for moose in the WCFA is 1.0 moose per square mile (corrected for sightability) during late winter surveys; the annual moose harvest objective for the WCFA is 155 moose;

(C) the wolf control population objective in the WCFA is to reduce wolf numbers by at least 60 – 80 percent; the pre-control estimate within the WCFA is 75 wolves; the pre-control wolf population in Unit **19(E)** [19(A)] is estimated at 150 wolves; only removing wolves from the WCFA will ensure that wolves persist in Unit **19(E)** [19(A)];

(D) the black bear control objective in the BCFA is to reduce black bear numbers to the lowest level possible; the pre-control black bear population in Unit **19(E)** [19(A)] is estimated at 2,500 – 3,000 black bears; the pre-control estimate within the BCFA is 92 – 102 black bears; because the BCFA is a relatively small geographic area, removing black bears from within the BCFA will have only a minor effect on the black bear population in Unit **19(E)** [19(A)];

(E) the brown bear control objective in the BCFA is to reduce brown bear numbers to the lowest level possible; the pre-control brown bear population in Unit **19(E)** [19(A)] is estimated at 180 – 210 brown bears; the pre-control estimate within the BCFA is 10 – 15 brown bears; because the BCFA us

a relatively small geographic area, removing brown bears from within the BCFA will have only a minor effect on the brown bear population in Unit **19(E)** [19(A)];

(4) board findings concerning populations and human use are as follows:

(A) the Unit **19(E)** [19(A)] IM moose population and harvest objectives have not been achieved;

(B) the WCFA objectives for moose density and moose harvest have not been achieved:

(C) predation by wolves and bears is an important cause of the failure to achieve moose population and harvest objectives;

(D) a reduction of wolf and bear predation within the WCFA and BCFA can reasonably be expected to make progress towards achieving the Unit **19(E)** [19(A)] IM objectives;

(E) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(F) reducing predation is likely to be effective given land ownership patterns;

(5) authorized methods and means are as follows:

(A) hunting and trapping of wolves and hunting of black bears and brown bears by the public in Unit **19(E)** [19(A)] during the term of this program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783;

(C) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits using fixed-wing aircraft as a method of wolf removal under AS 16.05.783;

(6) time frame is as follows:

(A) through June 30, **2030** [2026], the commissioner may authorize removal of wolves and black bears and brown bears in Unit **19(E)** [19(A)];

(B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose, wolf, and bear populations, and recommendations for changes, if necessary to achieve the objectives of the plan;

(7) the commissioner will review, modify, or suspend program activities when:

(A) the moose density and harvest objectives specified in this subsection are achieved within the WCFA;

(B) any measure consistent with signs of nutritional stress in the moose population are identified.

**What is the issue you would like the board to address and why?** In 2021 the Board of Game (board) passed Proposal 171 which split Unit 19A into two smaller subunits; Unit 19A and Unit 19E. This created various administrative errors including in 5AAC 92.108 and 5 AAC 92.123. Intensive Management (IM) is no longer being conducted in Unit 19A, but only in the new Unit 19E. Additionally, the current IM plan will expire on June 30, 2026, which is out of cycle with the Interior and Northeastern Arctic Region regular board of Game meeting. Due to COVID-19, the regularly scheduled meeting was postponed by one year, and this IM plan is now out of sync with that cycle. This proposal corrects the identification of the IM areas, updates the IM objectives and brings the IM plan back into alignment with the regularly scheduled board meetings for this area.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-050)

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## **PROPOSAL 58**

### **5 AAC 92.123. Intensive Management Plans VII.**

Authorize a Unit 19A predation control program as follows:

(a) **Plans established.** Intensive management plans for the following areas are established in this section:

(3) Unit 19(A) Predation Control Area;

...

(b) Unit 19(A) Predation Control Area: the Unit 19(A) Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(A), encompassing approximately 5,703 square miles; this predation control program does not apply within National Park Service or National Wildlife Refuge lands unless approved by the federal agencies; notwithstanding any other provision in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf population reduction or a wolf population regulation program in Unit 19(A) to benefit moose:

(1) the following Wolf Predation Control Focus Area is established in the Unit 19(A) Predation Control Area; the area does not delineate a moose, or wolf population and is not intended to distinguish animals within the area from populations in Unit 19(A); the purpose is to focus wolf control in a relatively small area where moose numbers can be better estimated, where moose are accessible to hunters, and where harvest can be closely monitored;

(A) the Wolf Predation Control Focus Area (WCFA) encompasses approximately 2,380 square miles within all Unit 19(A) drainages of the Kuskokwim River downstream of the Holokuk River; wolf control will be conducted only within the WCFA; the department

has the discretion to adjust the area's size and shape to include up to approximately 3,000 square miles of Unit 19(A);

(2) this program is designed to increase moose numbers and harvest in the WCFA by reducing predation on moose and is expected to make a contribution toward achieving the intensive management (IM) objectives in Unit 19(A);

(3) moose and wolf, objectives are as follows:

(A) the IM population objective established by the board for Unit 19(A) is X,XXX-X,XXX moose; the IM moose harvest objective for Unit 19(A) is XXX-XXX moose annually;

(B) the density objective for moose in the WCFA is 1.0 moose per square mile (corrected for sightability) during late winter surveys; the annual moose harvest objective for the WCFA is 100 moose;

(C) the wolf control population objective in the WCFA is to reduce wolf numbers by at least 60–80 percent; the pre-control estimate within the WCFA is 35 wolves; the pre-control wolf population in Unit 19(A) is estimated at 85; only removing wolves from the WCFA will ensure that wolves persist in Unit 19(A);

(4) board findings concerning populations and human use are as follows:

(A) the Unit 19(A) IM moose population objective has been met; the Unit 19(A) IM harvest objective has not been achieved;

(B) the WCFA objective for moose density has been met but moose harvest has not been achieved;

(C) predation by wolves is an important cause of the failure to achieve moose population and harvest objectives;

(D) a reduction of wolf predation within the WCFA can reasonably be expected to make progress towards achieving the Unit 19(A) IM objectives;

(E) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(F) reducing predation is likely to be effective given land ownership patterns;

(5) authorized methods and means are as follows:

(A) hunting and trapping of wolves by the public in Unit 19(A) during the term of this program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783;

(C) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits using fixed-wing aircraft as a method of wolf removal under AS 16.05.783;

(6) time frame is as follows:

(A) through June 30, 2030, the commissioner may authorize removal of wolves in Unit 19(A);

(B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose, and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan;

(7) the commissioner will review, modify, or suspend program activities as follows:

(A) when the moose density and harvest objectives specified in this subsection are achieved within the WCFA;

(B) when any measure consistent with signs of nutritional stress in the moose population are identified.

...

**What is the issue you would like the board to address and why?** The Board accepted Proposal 205 at the March 2020 Region III meeting. This proposal was submitted by the Central Kuskokwim Advisory Committee and requested an Intensive Management (IM) program in Unit 19A. The proposal had no detail other than a request for predator removals, and the Board requested the department submit a proposal at the next regularly scheduled meeting. This area had an active IM program for wolves from 2004 until 2009, however it was discontinued because of a lack of success removing wolves. Reasons for the lack of success primarily included land status which was a mix of private and federal lands, and poor snow conditions. Reliable snow conditions are still a challenge and there are still substantial federal lands. However, access to private lands has been granted by the local corporation which is the primary landowner. Population objectives are currently being met, but the goal of this plan would be to improve harvest and work towards meeting the IM harvest objectives.

This proposal will authorize the program for a six-year period from July 1, 2024 through June 30, 2030. It includes options for aerial wolf control conducted by public permittees and the department. Additional details will also be made available for public review in a separate IM operational plan prior to the board meeting.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-062)

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## **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 as follows:

Unit 19(A) RESIDENT HUNTERS: 1 antlered bull by Tier II permit only; up to 300 permits may be issued August 25 - Sept. 20

NONRESIDENT HUNTERS: No open season.

**What is the issue you would like the board to address and why?** In Unit 19A, we would like to open moose hunting on August 25<sup>th</sup>. It would give more hunting opportunity for working people.

**PROPOSED BY:** Central Kuskokwim Fish and Game Advisory Committee (HQ-F23-028)

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## **PROPOSAL 60**

### **5 AAC 92.123. Intensive Management Plans VII.**

Allow aerial wolf control in a portion of Unit 19C as follows:

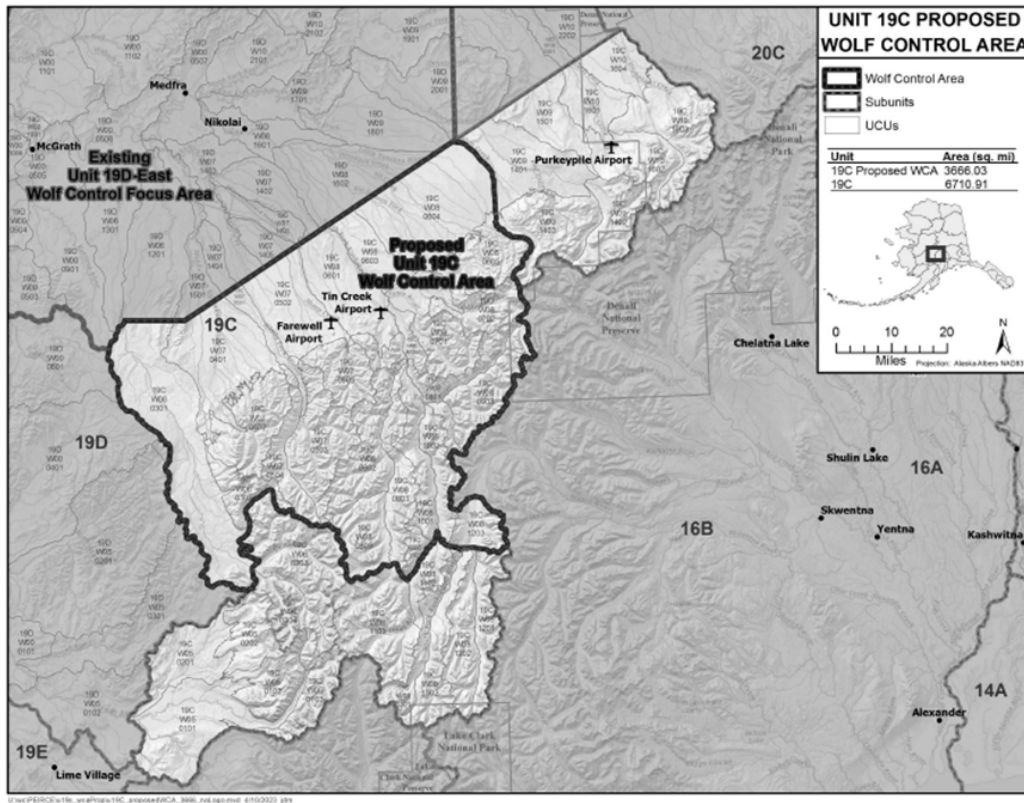
Allow for aerial predator control of wolves beginning in regulatory year 2024 in the portions of Unit 19C as defined in the proposal between November 1st and April 30th.

**What is the issue you would like the board to address and why?** Allow for predator control for wolves in a portion of Unit 19C (see map), beginning in RY2024.

Currently wolves prey heavily on moose in this area, which has recently seen declining moose numbers. The area is used heavily by hunters who rely on moose meat. There is currently very little harvest of wolves in this area.

Additionally, increased harvest of wolves in this area would likely benefit populations of moose, Dall sheep, bison and caribou in the area which have seen recent declines.





**PROPOSED BY:** McGrath Fish and Game Advisory Committee (EG-F23-241)  
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## **PROPOSAL 61**

### **5 AAC 92.123. Intensive Management Plans VII.**

Allow the take of wolves in Unit 19C the same day a person has been airborne and create an Intensive Management Plan for Unit 19C as follows:

Allow for same day airborne for wolf in Unit 19 C.

Adopt an Intensive Management (IM) plan for Unit 19C similar to the current IM in Unit 19D.

**What is the issue you would like the board to address and why?** In the last several years in Unit 19C, I have witnessed the decline of sheep, moose and black bear populations. I have also seen a significant increase in wolf activity, as they have minimal to no predators.

Most of our fall hunting camps are seeing wolves regularly. I have witnessed and seen countless fresh moose kills by wolves this winter. These wolf packs run down low and target moose and they run the tree line and target sheep.

**PROPOSED BY:** Andrew Weaver (EG-F23-320)  
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## **PROPOSAL 62**

### **5 AAC 92.123. Intensive Management Plans VII.**

Establish an Intensive Management program for Unit 19C as follows:

#### **Establishment of a Predator Management Program for Unit 19C.**

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

#### **Establish a Predator Management Program for Unit 19C.**

Unit 19C moose, sheep and caribou populations have long been managed to support important hunting opportunities for subsistence, resident and nonresident hunters.

Furthermore, the outstanding diversified wildlife habitats within Unit 19C region has for centuries been utilized for subsistence living by the Upper Kuskokwim People.

Professional guiding within Unit 19C has for many decades supported substantial local economy with family-owned professional guide services, employment, revenue for locally owned business and very important and significant game meat sharing within the Upper Kuskokwim region.

Prior to the late the 1980's and early 1990's ballot initiatives that took away Alaska's viable wolf control initiatives, moose, sheep and caribou populations thrived within this region. The ADF&G Upper Kuskokwim Advisory Committee process was vibrant with meetings so full that they could not hold another participant.

Numerous locally owned air services were active. There were active professional guide residents from every town or village within the Upper Kuskokwim Region working within Unit 19C. Economy and revenue from hunting related activity fueled many locally owned and operated businesses.

The amount of customary and traditional harvest, sharing of professional guide service donated game meat and utilization of wildlife harvest from Unit 19C was high.

The wolf population within Unit 19C was healthy with no endangerment concerns prior to the ballot initiatives.

The doctrines of sustained yield, maximum benefit and abundance were all being utilized successfully.

The post ballot initiative era has resulted in greatly reduced ungulate populations. Moose, sheep and caribou have never returned to even a medium density compared to what they were prior to the ballot initiatives.

Important species of willows, sedges, grasses and lichens are healthy within this region. Although some change is occurring, healthy, unutilized ungulate habitat is commonplace.

The results of this conservation failure have been greatly felt not just by the wildlife populations, but also by all of the people who depended, or are dependent upon prudent stewardship of these treasured wildlife resources.

Current wolf population within Unit 19C is very high. In recent years numerous packs have been observed with one numbering over fourteen animals, and another, yet different pack, of eight in the same general area, along with numerous pairs and individual animals. These sightings, although from primarily the same limited region of Unit 19C of which I am familiar, compare to the sightings which I know are valid from the much broader extent of Unit 19C.

We love our wolves; we just do not love them in mass quantities.

When ungulate numbers are held at low density equilibriums primarily by wolf populations, and have hard winters on top of the challenge of living with high wolf numbers, the challenge to survive is compounded.

Additionally, when the wolf numbers are high, moose, and especially Dall's sheep populations, have to try to survive year around within "protective habitats" instead of bountiful flora bearing habitats.

The combination of these significant stress factors carries a strong detriment to overall ungulate health.

Success of the Unit 19D East Predator Control Program initially included black, grizzly and brown bear objectives. However, the long-term success has been quantified by maintaining the focus on wolves.

My recommendation for the best interest of Unit 19C ungulate populations is to work with ADF&G to establish a carrying capacity of wolves for Unit 19C, then with Board of Game assistance, establish a predator management program that works to reduce and then maintain that number of wolves for a ten-year period, subject to an annual review and adjustment of wolf numbers by ADF&G.

Upon completion of the ten-year plan, it should come up for review and renewal.

It is significant to note that when important ungulate numbers are held at low density within healthy habitats by predation, and human interests begin fighting for what's left of declining resources, the results are a conservation tragedy. We need to be better stewards than this.

**PROPOSED BY:** Taiga Resources Conservation (EG-F23-316)

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## **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 as follows:

I recommend changing the Unit 19C RM653 registration permit moose hunt to a draw for nonresident up to 20 permits. Additionally, change the season to a 10-day hunt from September 8-17.

**What is the issue you would like the board to address and why?** Unit 19C RM653 registration hunt due to the over harvest of moose in the RM653 registration moose hunting by other resident and non-resident, declining in Moose population.

**PROPOSED BY:** Donald and Karla Ruhoff (EG-F23-201)

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## **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.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, and Jeff Rost (EG-F23-213)

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## **PROPOSAL 65**

### **5 AAC 92.123 Intensive Management Plans VII.**

Reauthorize the Unit 19D Intensive Management Plan as follows:

(A) **Plans established.** Intensive management plans for the following areas are established in this section:

...

(2) Unit 19(D)-East Predation Control Area.

#### **© Unit 19(D)-East Predation Control Area:**

...

(6) time frame is as follows:

(A) through **June 30, 2030** [June 30, 2026], the commissioner may authorize removal of wolves and black bears and brown bears in Unit 19(D)-East;

**What is the issue you would like the board to address and why?** The current Unit 19D intensive management plan will expire on June 30, 2026, which is out of cycle with the Region III (Interior and Eastern Arctic) regular board of game meeting. Due to COVID-19, the regularly scheduled Region III meeting was shifted by one year, and this Intensive Management (IM) plan is now out of sync with that cycle. This proposal will bring the IM plan back into alignment with the regularly scheduled board meetings for this area.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-049)

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## **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 as follows:

-RM650 valid in all of Unit 19D September 1-30.

-Harvest ticket in Unit 19D upstream of the Selatna River, but excluding two miles on either side of the Kuskokwim River from the mouth of the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim River, and two miles either side of the South Fork of the Kuskokwim River from the mouth of the South Fork to Nikolai, and two miles either side of the Takotna River from the mouth to the bridge at Takotna, September 1-30.

-Harvest ticket in Unit 19D downstream of and including the Selatna River, September 1-20.

-Resident draw permit for up to 20 cows above the Selatna River, September 1-30.

**What is the issue you would like the board to address and why?** We would like to modify portions of the RM650 registration permit in Unit 19D, in order to increase opportunity, to include the following:

-RM650 valid in all of Unit 19D September 1-30.

-Harvest ticket in Unit 19D upstream of the Selatna River, but excluding two miles on either side of the Kuskokwim River from the mouth of the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim River, and two miles either side of the South Fork of the Kuskokwim River from the mouth of the South Fork to Nikolai, and two miles either side of the Takotna River from the mouth to the bridge at Takotna, September 1-30.

-Harvest ticket in Unit 19D downstream of and including the Selatna River September 1-20.

-Resident draw permit for up to 20 cows above the Selatna River September 1-30.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee (EG-F23-237)

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**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 as follows.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(17)

...

Unit 19(D) that portion upstream  
from the Selatna River, excluding  
the Black River

**RESIDENT HUNTERS:**

...

1 moose, by registration permit only, a person may not take a cow accompanied by a calf	Feb 1 – Last day of Feb.
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...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The moose population in Unit 19D East has approximately doubled since predator removals began in 2003. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. By 2022 ratios had declined again and the two-year average was 21 bulls per 100 cows.

Additional harvest opportunity is available, particularly outside of the BCFA. Winter hunts distribute hunter pressure temporally and allow access to areas which are inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-047)  
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## **PROPOSAL 68**

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

Allow moose registration permit RM682 to be obtained online as follows:

Unit 19E, permit RM682: One antlered bull by permit availableonline July 18-22.

**What is the issue you would like the board to address and why?** Hunt RM682 permit ought to be available online. Having the permit available only in person, causes undo economical strain for communities along the Kuskokwim River. Fuel prices along the Kuskokwim River are excessive. Meaning individuals living along the Lower Kuskokwim River have to make the trip twice. With the restrictions of the Holitna-Hoholitna Contolled Use Are (HCUA) it will be a two-day travel, with a 40 horsepower outboard motor. This rule is allocating RM682 permit to only approximal locations and those who can fly from Anchorage.

**PROPOSED BY:** Samuel Hancock

(EG-F23-265)

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## **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 as follows:

If you receive a RM682 permit you MAY receive anther permit to hunt moose in the Kuskokwim drainage this regulatory year. This includes TM680, TM684, RM615, RM650, RM653, RM655 and RM660.

**What is the issue you would like the board to address and why?** Individuals fortunate enough to obtain a RM682 permit are not allowed to receive any other permit in the Kuskokwim drainage. These harvest opportunities are about filling the freezers for the populations living here. RM682 permit holders are being punished for having this permit. With the decline of subsistence fishing and economic hardship for people living in this area. People should be afforded more opportunities to feed their families.

**PROPOSED BY:** Samuel Hancock

(EG-F23-264)

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## **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 as follows:

Would recommend also issuing at least fifteen permits in Bethel, Alaska to resident hunters that live on the Kuskokwim River, but are still able to hunt statewide if there are limits to having this permit in possession of the said hunter.

**What is the issue you would like the board to address and why?** The Unit 19E registration hunt gives the Alaska Department of Fish and Game to limit the amount of hunters to hunt the Holitna River during the periods Sept 1-5 by issuing the permit in Sleetmute and Stoney River only. Over the past years less than 30 moose have been legally taken on the Holitna River with these permits being issued and would

help control the moose population if they get over populated and would not have enough food for the winter.

**PROPOSED BY:** Mike Glore (EG-F23-309)

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## **PROPOSAL 71**

### **5 AAC 92.540. Controlled use areas.**

Eliminate the Holitna-Hoholitna Controlled Use Area in Unit 19 as follows:

Holitna-Hoolitna Controlled Use Area (HCUA) is dissolved.

**What is the issue you would like the board to address and why?** Eliminate the Holitna-Hoholitna Controlled Use Area (HCUA). Restricting outboard motors to 40 horsepower is over regulation. There are other tools being used to manage moose populations. Historical data show Lower Kuskokwim communities have relied on natural resources provided by this area. HCUA puts unjustified economical strain on the communities of the Kuskokwim. The state is regulating these underserved communities out of the area under the guises of moose management.

**PROPOSED BY:** Samuel Hancock (EG-F23-263)

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## **PROPOSAL 72**

### **5 AAC 92.540. Controlled use areas.**

Change the restrictions of the Holitna-Hoholitna Controlled Use Area by allowing outboards with greater than 40 horsepower to hunt a portion of the season as follows:

If the hunter has an outboard of 40 horsepower, let the issuing permit holder hunt September 1-30.

For hunters that have a outboards greater than 40 horsepower and are a permit holder, let them be able to hunt September 10-20 which will still give the Department of Fish and Game a limit on which dates these hunters are able to hunt within the Controlled Use Area of the Holitna-Hoholitna River downstream of Kasheglok.

**What is the issue you would like the board to address and why?** Remove the outboard and inboard horsepower restriction in the Holitna - Hoholitna Controlled Use Area of Unit 19E.

The Department of Fish and Game has many tools to limit the amount of hunters to hunt the Holitna and Hoholitna River and or keep harvest at sustainable levels while limiting the amount of registration permits to be issued to hunt on the Holitna and Hoholitna River. This restriction of having a 40 horsepower limit discriminates other hunters to hunt the Unit 19E Controlled Use Area of the Holitna - Hoholitna River.

**PROPOSED BY:** Mike Glore (EG-F23-311)

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**PROPOSAL 73**

**5 AAC 92.124. Intensive Management Plans VIII.**

Reauthorize the Intensive Management Plan for Unit 21E for six years as follows:

Extend the Intensive Management Plan in Unit 21E for six years.

**What is the issue you would like the board to address and why?** The current Intensive Management (IM) Plan for Unit 21E expires June 30, 2024. The Grayling, Anvik, Shageluk and Holy Cross (GASH) Advisory Committee would like the board to extend the IM Plan for Unit 21E for six years. There will be no changes to the current regulatory language and the plan would run from July 1, 2024 to June 30, 2030.

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross (GASH) Fish and Game Advisory Committee (EG-F23-261)  
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**PROPOSAL 74**

**5 AAC 92.050. Required permit hunt conditions and procedures.**

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

Require applicants for Unit 21E moose drawing hunt DM837 to provide a unique verification number when applying for that hunt as follows:

Require a unique verification code for people applying to the DM837 draw hunts in Unit 21E.

**What is the issue you would like the board to address and why?** The Grayling, Anvik, Shageluk, and Holy Cross (GASH) Fish and Game Advisory Committee would like to require a unique verification number for nonresidents applying for a DM837 unguided moose hunting permit. This would be the same as the current regulations for guided DM839 hunters who need to provide a unique verification number before they can apply to that permit. We are concerned about illegal transporters in our area and requiring a unique verification code would solve this issue. Additionally, people are currently obtaining DM837 permits without arranging a transporter and when they start looking after they win the draw most transporters are already booked and those permits then go unused. Finally, requiring a unique verification number will be beneficial for enforcement and help them identify illegal transporters.

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross (GASH) Fish and Game Advisory Committee (EG-F23-262)  
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## **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 as follows.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(19)

...

Unit 21(E)

RESIDENT HUNTERS:

...

1 moose, by registration permit  
only, a person may not take a cow  
accompanied by a calf

Feb 15 – Mar 15

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The most current survey in 2022 indicated there are approximately 9,300 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000–11,000 moose. There is currently a harvestable surplus of 390 moose, however many of those moose are not accessible in the fall. Approximately 200 moose are harvested each fall along the rivers. Bull-to-cow ratios are high, with 46 bulls per 100 cows in 2022. The Intensive Management (IM) harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 1.9 moose/mi<sup>2</sup> in 2022. The 2-year average twinning rate in the Holy Cross area is 26%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 43%.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure temporally and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-046)

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## **PROPOSAL 76**

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

Reopen all Unit 19C sheep hunts as follows:

Full curl management is the best option biologically for Dall sheep management supported by our ADF&G biologist. I propose that the Board of Game (BOG) reinstates the subsistence sheep hunt as previously allowed. As well as reinstate a nonresident hunt of one ram every four regulatory years with hunt dates of 8/15-9/10 annually.

**What is the issue you would like the board to address and why?** The nonresident and subsistence season for Dall sheep in Unit 19C. Dall sheep have been shown to be on cyclical patterns since the beginning of their study and tracking in Alaska in the 1920s. Full curl management has been implemented since 1992 and this is one of the most conservative approaches to sheep management in the United States that have sheep. This ruling was decided on at a time where Dall sheep were at remarkably similar numbers to their current numbers. We have seen an abundance of sheep in 2003 and 2018 since that time. Biologist support this management strategy and do not support closures. The numbers seen in Unit 19C are paralleled in other units of the state including those in national parks where no hunting is permitted. This is a predator and weather issue much more than it is hunter take. Over the past five years numbers of hunters have declined by 62%, this is resident, nonresident & subsistence hunters. The numbers are reflecting the effort in the field and self regulating already. By closing two user groups down this will send more pressure into other areas of the state and create even more problems. ADF&G studies have shown that the mortality rate of Dall sheep greatly increase after eight years. This population which is legal to hunt is going to die of natural causes and go unused. This eight year old population is also at the end of their competitive mating life. Not managing these animals does not add sheep on the mountains.

**PROPOSED BY:** Anthony Marchini

(EG-F23-268)

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## **PROPOSAL 77**

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

Reopen Unit 19C to sheep hunting as follows:

The Board should rescind Proposal 204 as passed in Soldotna.

**What is the issue you would like the board to address and why?** The Board erred greatly by passing Proposal 204 as amended from the last Board of Game meeting in Soldotna.

I urge the board to rescind its actions on Proposal 204 which was “faulty” on several fronts. Here are a few of the elements which were disregarded:

#### **Board-Generated Proposals**

The Board should be receiving proposals from the public, not creating its own proposals that it then passes. This action essentially supersedes the rights of the public and appears to be a conflict of interest since the board can hardly be unbiased as to its very own proposal.

#### **Conservation to Discrimination**

The drafting of board-generated Proposal 204, based on emotion and not facts, was written as a self-perceived rescue operation for the sheep of Unit 19C by precluding all hunting for five years. This is so outlandish it clearly has absolutely no basis in fact for its creation, either for the duration or the severity of the proposal. But somewhere along the chronology of the discussion, the conservation motive was cast aside for an arbitrary and capricious substitute precluding only nonresident sheep hunting. There was no legitimate reason to discriminate against nonresidents.

#### Board of Game Usurps the Commissioner's Authority to Manage

We can see the first duty of the Commissioner in statute is to manage. So why did the board step in and presume to do so by creating Proposal 204? If there really was a conservation concern, the Commissioner could at any time create an emergency order to modify the harvest. But there wasn't a conservation concern on the part of the real manager to justify the board's actions, therefore the Board overstepped its bounds in creating and passing Proposal 204.

#### Ignores the Economic Wellbeing of the State per AS 16.05.020

In sheep hunting across the state, if you don't include the sale of Governor's tags, nonresident sheep hunters contribute about 86% of the sheep hunting revenue that goes to the Fish and Game Fund. Residents contribute 14%. Historically in Unit 19C nonresident hunters contribute 95% of sheep hunter funds going into the Fish and Game Fund. So if the statutes require, in the decisions about how wildlife should be managed, that the "general wellbeing of the economy" be given credence, under what mathematical system would the board exclude the users who pay 95% of sheep hunter revenue in Unit 19C? Before the current weather mediated lower sheep numbers, equal numbers of resident and nonresidents hunted in that unit each year. With the Pittman-Robertson match residents on average over five years brought to the Fish and Game Fund \$18,000 per year while nonresidents contributed \$367,000 annually. Failing to consider the importance of the economic implications of the final outcome of the board's decision, precluding nonresidents is clearly nothing short of a grievous fiscal error on the part of the board.

#### Ignores the October Department Sheep Report

In October the board called on the department for a "state of sheep" report. Department staff gave a wonderful and detailed report, and in so doing said straight out the decline in sheep numbers, where they occur, are weather-driven, AND there is NO CONSERVATION CONCERN. The board apparently failed to hear what everyone else heard from these dedicated department sheep biologists. But the department again sent the same message to the board at the recent Board of Game meeting, and the board appeared to have not heard it. It would be inappropriate if this occurred because the board was so invested in their own proposal (read conflict of interest) that they once more ignored what the experts had to say and acted in contrary to the data provided them (twice). Indeed, if there is no conservation concern as stated by the managers (the department), why did the board act so egregiously by taking matters into its own hands thinking they had the data and scientific knowledge greater than that of the department's experts?

#### Ignores the Protective Nature of Full Curl

It is widely known and accepted by biologists who have been in the business for several decades that a full curl harvest regime is helpful to the population as a whole in that only the surplus mature rams are harvested. The father of sheep biology, having proved the benefits of full curl, and this work was retested on Dall sheep<sup>1</sup>, Testimony was given to the Board of Game that this regime is the most protective to sheep while also keeping the young rams from over stressing at breeding time and wearing themselves out trying to copulate as they would without the presence of mature rams to disincentivize them from acting out.

Oddly, in Units 7 and 15 where the sheep situation is much worse off than that in Unit 19C, the board just let full curl ride, but in Unit 19C, a lesser affected area, the board went straight to not letting full curl do its job and instead did the irrational thing by precluding hunters when there was no reason to.

### Going Emotional Instead of Relying on The Science

I was told that a retired trooper in the hopes of precluding any sheep hunting in Unit 19C (where his son got a 42" ram a couple years ago) was saying if there are no rams to break trail in the snow for the lambs, the latter would die. If it is true, this story got any traction at all it is a fanciful fabrication. Lambs don't hang out with rams. They stay with their mothers who don't hang out with the rams either. The board must base its decisions on truth and data as shared by the department's experts, not on emotional tales invented to elicit an emotional response.

### Ignores the Adaptability of Sheep

Sheep have been in Alaska for thousands of years. And in those years there surely must have been fluctuations in population numbers. We know that parts of Alaska experienced both tropical epochs followed by deep glaciation. Sheep are adaptable. They have probably suffered much worse than things are now in Unit 19C, or even Units 7 and 15. They will be fine. The current low numbers are due to weather events, and they will rebound. Until then there is no reason or any scientific basis to curtail any hunting at this time.

So please rescind what was passed for all the wrong reasons of Proposal 204.

Thank you very much.

<sup>1</sup>The author provided names of individuals which were redacted as a matter of proposal policy.

**PROPOSED BY:** Karen Gordon

(EG-F23-315)

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### **PROPOSAL 78**

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

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

#### **5 AAC 85.055. Unit 19C Sheep**

**Nonresident hunters. One ram with full curl horn or larger every four regulatory years. Harvest ticket. August 10 - September 20** [No open season]

**What is the issue you would like the board to address and why?** Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have shown a cyclical pattern since record keeping began in the 1920s. Per the Alaska Department of Fish & Game (ADF&G) website, "Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well." This

cyclical pattern is well documented in the 2022 Board of Game (BOG) Dall's Sheep Informational Meeting Presentation that was presented by ADF&G. In 1945, 1992 and 2022 were all noticeable downturns in overall sheep populations. In retrospect, an abundance of sheep were observed in 1930, 1968, 2003 and 2018. The department opposes a closure of Dall sheep hunting but remains neutral as to who gets to hunt Dall sheep based on historical trends in Dall sheep populations and the states full curl eight-year-old regulation.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. The harvesting of full curl, eight plus year old rams is just a small fraction of the overall population and the empirical evidence has shown to have no detrimental effects on the overall population. This regulation has allowed the department to have a longer hunting season and provides ample opportunity for all to hunt a full curl ram. Full curl regulation has been the best management tool for 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chances of survival greatly diminish within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Furthermore, harvesting these older rams gives the younger adults, which are in their prime, protection from injury during the rutting season. The full curl eight plus year old ram resource will go unutilized when hunter participation is limited and or restricted. Since the start of the decline, Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five year period. Why? The short answer is self-regulation. ADF&G records of hunter participation show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts in other areas of the state. A quick search on the ADF&G website indicates that other mountain ranges have seen an increase in sheep hunters since 2018. On the flip side, the five year period leading up to 2018 saw a steady increase in Dall sheep hunter participation due to good numbers of sheep and higher than normal success rates. Hunter participation will rise and fall right along with the rise and fall of Dall sheep populations. The department estimated 40 harvestable rams in Unit 19C for the 2022 season and records show that 27 residents participated in the hunt. Again, the Dall sheep resource will go unutilized by limiting nonresident participation.

If nothing is changed, a harvestable number of rams will go unutilized in Unit 19C. Other units will see a noticeable increase in Dall sheep hunter participation. Not only in guided nonresident hunters but also in second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. On a side note, any Alaska businesses that are related to nonresident sheep hunting will suffer.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, Jeff Rost, and Jon Burrows

(EG-F23-307)

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## **PROPOSAL 79**

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

Reopen Unit 19C to nonresident sheep hunters as follows:

Unit 19C Dall Sheep Hunting Season Dates 2024:

Nonresident Hunters: Aug 10 - Sept 20, 2024.

**What is the issue you would like the board to address and why?** Reauthorize nonresident Dall sheep hunting opportunity within Unit 19C.

Dall sheep management in Alaska has been successfully conducted for several decades by utilizing the “Full Curl” concept of management which recognizes that harvest of older age class rams does not impact overall sheep population trends. This is a long time proven scientific basis that has successfully spanned numerous historical varying Dall sheep population trends, eras, and regions throughout the state without requiring changes to allocation.

Through addressment of an out of cycle proposal (2023 instead of 2024) relative to closing nonresident Dall sheep allocation within Unit 19C, the proposal as passed was emotionally driven, ignored long term proven scientific management, was out of bounds in relation to the integrity of the process, and hurtful to those who depend upon the scientific driven conservation basis of wildlife management.

By deviating from proven, scientific management guidelines, we have paved the way for utilization of non-science-based action to base similar hunter restriction or elimination efforts within both State and Federal wildlife management arenas.

Board of Game (BOG) decisions turning away from Dall sheep full curl management will lead to similar requests relative to moose management by antler restrictions.

If it is not broken, don’t fix it. Do not open Pandora’s Box of curses. Full curl management and antler restrictions work.

Elimination of allocation without proven science and ignoring proven science to take away livelihoods generates unneeded disrespect for the BOG process. How can any professional guide service provider try to build viability and sustainability within a conservation based operating basis, not live in fear of BOG actions. This type of action generates unneeded disrespect for the process.

BOG action taking away nonresident hunter allocation, will not affect the Dall’s sheep population trend within Unit 19C.

ADF&G Department of Wildlife Conservation staff provided the BOG solid data that Dall sheep management by full curl guidelines works. The BOG chose to differ from known and proven science by eliminating nonresident allocation within Unit 19C.

Professional guides would have a few hunters according to viable opportunity, the dreams of their clients would be intact, local businesses would have continued to have revenue, resident hunters would have opportunity and all of us should have turned together to focus on initiatives that would actually help our wild sheep.

The Alaska Board of Game and Big Game Commercial Services Board have a liaison position which was developed for situations that need addressed by both entities. That position should be encouraged to bring

concerns relative to conservation trends for distribution to professional service providers who operate within the regions and species of concern. This position was designed to help buffer conservation and allocation concerns and should be encouraged.

Respectfully Submitted

**PROPOSED BY:** Taiga Resources Conservation

(EG-F23-310)

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## **PROPOSAL 80**

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

Reopen sheep hunting in Unit 19C to nonresidents as follows:

What solution do you recommend?

#### **Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:**

##### **5 AAC 85.055. Unit 19C Sheep**

Nonresident hunters. One ram with full curl horn or larger every four regulatory years. Harvest ticket. **August 10 - September 20** [No open season]

**What is the issue you would like the board to address and why?** Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have a cyclical pattern observed since the 1920s when record keeping began.

I quote, from Alaska Department of Fish and Game (ADF&G) website, “Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.”

The cyclical pattern has been documented in the 2022 Board of Game (BOG) Dall Sheep Informational Meeting Presentation presented by ADF&G. In 1945, 1992 and 2022 displayed noticeable downturns in overall sheep populations. While an abundance of sheep were observed in 1930, 1968, 2003 and 2018. Primarily due to weather events.

The board adopted the full curl regulation in 1992. This is one of the most conservative approaches to Dall sheep management. Limiting harvest to full curl, eight plus year old rams, which are a small percentage of the overall sheep population has been proven to have no detrimental effects on population. Even compared to National Parks in Unit 19C where hunting is not allowed. Full curl regulation has been the standard management tool for 30 years protecting our sheep herds from overharvest while allowing all users opportunity to hunt.

Department studies show once a ram is more than eight years, chances of survival are much lower. Very few rams survive beyond 12 years. Full curl, eight plus year old rams’ constitute less than 5% of the total

sheep population. The harvesting these older rams eight years + has shown no negative impacts on sheep populations. Taking older rams out of the herd gives the younger sheep less risk of injury during the rutting season and less grazing competition. Resulting in better chance of breeding age rams surviving a difficult winter.

Unit 19C recently has seen a large decline in hunter participation.

During the 2018 season, Unit19C saw a record number of 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. In a 5-year period there was a 62% decline in sheep hunters. Hunters tend to self-regulate as game populations cycle leading to fewer hunters. ADF&G records of hunter participation show when game populations are low, fewer hunters hunt that area. Dall sheep hunter participation in Unit 19C represents these trends. The sheep population declined, success rates were lower, sheep hunters moved to other areas. ADF&G website indicates other units with sheep populations have increased in hunter participation since 2018. In Unit 19C the five year period leading up to 2018 there was an increase in Dall sheep hunters due to good numbers of sheep and above historical success rates. These trends show hunter participation follows the cyclic nature of Dall sheep populations. An ADF&G estimated 40 harvestable rams in Unit19C for the 2022 season, 27 residents participated in the hunt. By closing the nonresident season the Board of Game went against ADF&G opposing the proposal to close the season for five years. This shuts out an entire user group. Following the data this will move sheep hunters to other areas of the state while there is an opportunity for harvestable rams in Unit 19C.

If nothing is changed:

Other units will see a noticeable increase in Dall sheep hunter participation many of which are showing the same decline due to winter events as Unit 19C. From guided nonresident hunters, second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. Creating additional competition amongst user groups in these areas. All while harvestable mature rams will be available the to hunt is lost for three (yes 3) user groups.

Alaska businesses that are related to nonresident sheep hunting will suffer:

1. Loss of revenue
2. Loss of jobs
3. Loss of license monies and associated Pittman-Robertson match funds
4. Land use permit monies
5. Potential business closures by commercial operators

All from an adopted proposal unsupported by our professional biologists at the Alaska Department of Fish and Game.

**PROPOSED BY:** Jeff Pralle

(EG-F23-275)

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## **PROPOSAL 81**

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

Reestablish seasons and bag limits for sheep hunting in Unit 19C as follows:

I don't have access to the new language passed by the board in March. My ideal suggestion would be for two members of the board call a meeting to delay implementation of this action for one year pending better data. Failing that, the seasons and bag limits for Unit 19C should be reestablished for the 2024 season.

**END NOTE: The practice of board-generated or board amended proposals is not clearly permitted in Alaska Statute or regulations.** Just where the idea arose is uncertain, but it seems to have come along when former ADF&G biologists (who were accustomed to being managers) began to serve on the Board of Game.

Complicating the issue is the underlying confusion between “management” and “allocation.” management has to comply with the Alaska Constitution and statutes. However, “management” can be effectively altered or truncated by regulation. There is little safeguard against this eventuality. If the Board of Game cannot tease this confusion out satisfactorily with the actual manager of record, the Commissioner’s Office/department, it would be rational for the legislature to provide more direct guidance. That process is presently being debated for the “Area M” commercial fishery via HB 128.

When the Board of Game makes its own proposal for regulatory change where the manager has not been substantively involved, then subsequently amends the proposal in deliberation (with no opportunity for public comment), and the final board vote is apparently swayed by emotional appeal. The optics (whether procedurally allowable or not) are not good.

**What is the issue you would like the board to address and why?** The recent board action banning nonresident Dall ram hunting in Unit 19C should be rescinded or delayed. I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

#### **BIOLOGY AND MANAGEMENT:**

1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today’s declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.

2.This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.

3.Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.

4.The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.

#### **PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)**

1. The apparent declines in Dall sheep populations have led to the *intuitive assumption* that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.
2. Sufficient concern over these *intuitive assumptions* was expressed to the Board of Game that it requested an informational meeting with Alaska's Dall sheep biologists and managers about the status of Dall sheep research and management last October.
  - a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner's Office through the Department of Fish and Game. According to the established statutes, the Commissioner's Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.
3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.
4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.
5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.
6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board-generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.
7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted.
  - a. At this time, the total input from the "generating board" is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.
8. Subsequently, the board met in mid March to consider the board-generated proposal to close all Dall sheep in Unit 19C for five years.
9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass.
  - a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim.
    - i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK's request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.

10. In an apparent effort to garner more board support (votes) for the (his or the Board's?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting.

a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.

11. The board approved the amendment, and moved to consider the amended proposal.

12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.

13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote margin.

a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.

14. As things stand at present, nonresident participation in mature Dall ram harvesting is scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt. are still allowed by regulation.

#### PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,

“... the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner's Office.

a. Alaska law (AS 16. ARTICLE 1. Sec. 16.05.010.

**Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME)** says “The commissioner is the principle executive officer of the Department of Fish and Game.”

2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the... game resources of the state in the interest of the economy and general well-being of the state.”

a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner's obligation and authority to manage in the best interests of Alaska's economy.

1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.

2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the

State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”

a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.

b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.

3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says:

“ . . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”

a. If use isn’t maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident-free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

**PROPOSED BY:** Wayne Heimer

(EG-F23-266)

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## **PROPOSAL 82**

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

Change nonresident sheep hunting in Unit 19C as follows:

#### **Unit 19C**

##### **Nonresident Hunters**

**One ram with full curl horn or larger by  
drawing permit only, every four regulatory years;  
up to 10 permits may be issued**

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN  
OR LARGER, EVERY FOUR REGULATORY YEARS]

Alternatively, the board could use a percentage of the estimated harvestable surplus of legal rams to allocate draw permits to nonresidents, as follows:

#### **Unit 19C**

##### **Nonresident Hunters**

**One ram with full curl horn or larger by  
drawing permit only, every four regulatory years;  
the number of permits issued may be up to 25**

Aug 10 – Sept 20

**percent of the estimated harvestable surplus of sheep.**

[ONE RAM WITH FULL CURL HORN  
OR LARGER, EVERY FOUR REGULATORY YEARS]

*Note: The Department states that there is currently a harvestable surplus of 30 legal rams in Unit 19C.*

**What is the issue you would like the board to address and why?** Since our formation in 2016, Resident Hunters of Alaska (RHAK) has been submitting proposals (all voted down) to limit nonresident sheep hunters in Unit 19C, based on sheep conservation concerns and fears residents would lose general sheep hunting opportunities if nonresidents were not limited. For over a decade, unlimited nonresident sheep hunters have taken nearly 80 percent of the annual ram harvest in Unit 19C. In RY 2020, the department closed the winter subsistence sheep hunt based on biological concerns for the sheep population, but the board did not act as required to place any restrictions on the general hunt. The sheep population continued to decline and in 2022 nonresident sheep hunters took 90 percent of the harvest of a significantly reduced sheep population.

Our concerns and fears were realized when the board, after years of implying that unlimited sheep hunting opportunity under full-curl harvest management was sustainable, submitted their own board-generated Proposal 204 out of cycle for the 2023 Region II (Southcentral) meeting to completely close all sheep hunting in Unit 19C for five years for everyone, based on conservation concerns for the sheep population.

Proposal 204 was amended to close Unit 19C sheep hunting only for nonresidents for five years and passed by a 4-3 vote.

RHAK has never sought to eliminate nonresident sheep hunters, and had the board taken action in previous years to limit nonresident sheep hunters, this complete nonresident sheep hunting closure in Unit 19C would not have been necessary and would not have had such an impact on guides and their clients who already had hunts booked, as well as impacts to department revenues from the loss of income from the sale of nonresident hunting licenses and sheep tags.

This proposal is being drafted after the board decision in March of 2023 to close Unit 19C to all nonresident sheep hunting for five years, recognizing that there will likely be proposals submitted for the Region III (Interior and Eastern Arctic) meeting in 2024 to open the nonresident sheep hunt earlier.

We could support a nonresident opening prior to 2028 if nonresident sheep hunters were put on a draw permit system now with a limited allocation of permits.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F23-015)

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**PROPOSAL 83**

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

Reopen sheep hunting in Unit 19C to nonresidents, by bow and arrow only, as follows:

Reinstate nonresident Dall sheep hunting in Unit 19 but by bow and arrow only as follows:

Unit 19

Nonresidents

**BAG LIMIT: ONE RAM WITH FULL-CURL HORN OR LARGER EVERY 4 REGULATORY YEARS BY BOW AND ARROW ONLY**

**SEASON DATES: AUG 10 - SEPT 20**

[No open season]

**What is the issue you would like the board to address and why?** I believe a solution to continue nonresident sheep hunting opportunity while also reducing the take would be to allow hunting by bow and arrow only. The Board of Game recently closed sheep hunting to nonresidents in Unit 19 due to perceived ideas of hunter impact by locals. The department evidence did not support that nonresident sheep hunters who were limited to one full curl ram every four years, were the reason for sheep population decline in Unit 19. The department cited that weather was the driving factor in the sheep decline. I feel that taking away hunting opportunity in this case is not solving anything and is also potentially hurting outfitters in the area for no good reason.

Bringing back the nonresident season, but limiting the take to bow and arrow only would accomplish three things. First, it would bring back the opportunity to pursue mature rams and allow guides to continue offering sheep hunts. Second, the take would be extremely minimal due to the challenges of hunting sheep with archery equipment, therefore accomplishing the original goal of limiting harvest numbers. Third, this would be a great opportunity to build a record and data of how bowhunting can be used as a valuable management tool that can save hunting opportunities while at the same time not making a negative impact on game populations.

This data could also be used to revisit this topic in the next Board of Game cycle for this area.

**PROPOSED BY:** Mike Harris

(EG-F23-299)

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## **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 as follows:

One full-curl or larger ram every two regulatory years for residents. Nonresidents are already at one legal ram every four regulatory years. This places a higher priority on shooting mature aged rams and lessens the chance of a sub legal ram taken by mistake. Rams “close” to legal will be passed over and saved for the next season when they are obviously of age and legal hence giving them at least one more season of mating to help the population.

**What is the issue you would like the board to address and why?** The harvesting of sublegal rams. While the bulk of the sheep population issue is weather and predator related. An issue that we can help is the taking of sub legal rams. 8 year old, full curl or double broken rams are the statewide professional biologist standard of management. To put more of an emphasis on this and leaving breeding age rams in the population longer therefore putting more sheep on the mountain in the long term. Taking of sub legal or immature rams needs to be placed in a higher priority.

**PROPOSED BY:** Anthony Marchini

(EG-F23-274)

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## **PROPOSAL 85**

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

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to eight year old rams, as follows:

Resident hunters in Unit 19C:

Harvest of a ram 8-year-old or older and hunter will be eligible to hunt sheep the next season.

Harvest a 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a 6-year-old or younger ram, and the hunter will be ineligible to hunt sheep for the next three seasons.

\*\*\*If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

**What is the issue you would like the board to address and why?** In recent years there has been widespread concern raised about the harvesting of young rams during Full-Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska’s sheep population has been noted to be on a steady decline and it’s time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 during the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this

sheep decline will not be changing in a meaningful way. Unlike previous sheep declines, which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight years-old and if a few old outliers are removed, from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5-years-old with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Full-Curl Management regulation. Shooting a full curl seven-year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C. I am open to this being adopted region or statewide but have targeted it here to Unit 19C due to recent concerns. Unit 12 would also be a good place to introduce this regulation.

**PROPOSED BY:** Paul Forward

(EG-F23-285)

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## **PROPOSAL 86**

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

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to ten year old rams, as follows:

\*\*\*This is a more conservative version of the other proposal with more conservative age requirements. This is consistent with some of the theories on ram viability put forth by multiple wildlife biologists from Alaska and British Columbia.

Resident hunters in Unit 19C:

Harvest of a ram 10-years-old or older and hunter will be able to sheep hunt again in Alaska the next season.

Harvest of a full-curl or carger ram 8 or 9-year-old, the hunter will be ineligible to hunt sheep for next one season.

Harvest a full-curl or larger but 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a full-curl or larger but 6-year-old or younger ram, the hunter will be ineligible to hunt sheep for the next three seasons.

\*\*\*If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

**What is the issue you would like the board to address and why?** In recent years there has been widespread concern raised about the harvesting of young rams during Full Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska's sheep population has been noted to be on a steady decline and it's time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 in at the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight-years-old and if a few old outliers are removed from the approximately 50 or so rams killed when calculating, the average age of a sheep killed is under 7.5 with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Management regulation. Shooting a full-curl seven7-year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C.

**PROPOSED BY:** Paul Forward (EG-F23-287)

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## **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 as follows:

Unit 19C Resident Dall Sheep General Season: August 15th - September 10th.

Nonresident Dall Sheep Season: August 21st - September 10th.

Youth Hunt Season: None

Subsistence Hunt Season: no recommendations

Bag limit for resident or nonresident: Same as current - one ram that is 8-years-old, broken on both sides, or full-curl or passes the angle or stick test on at least one side.

Methods and Means: General harvest methods.

**What is the issue you would like the board to address and why?** The Board of Game (BOG) had legitimate conservation concerns about Dall sheep populations in Unit 19C and submitted a board generated proposal for the Southcentral Region Meeting in Soldotna in March of 2023. It would've impacted all user groups equally by closing the season for five years for everyone. They ended up amending the original proposal and passing one that was mostly if not entirely allocative, by closing in entirely to nonresidents and leaving the entire resident season - except for the youth hunt, in place. This caused serious financial losses to many, including the state of Alaska Department of Fish and Game.

**PROPOSED BY:** Wayne Kubat (EG-F23-322)  
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**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 as follows:

This proposal would transition all sheep hunting in Unit 19C to **by bow and arrow only**.

**Resident:** One ram with full-curl horn or larger **by bow and arrow only**.

**Nonresident (when/if moratorium ends):** One ram with full-curl horn or larger every four regulatory years **by bow and arrow only**.

**What is the issue you would like the board to address and why?** The purpose of this proposal is to maintain hunting opportunity for resident and nonresident hunters (when/if the moratorium is removed) while decreasing harvest in the Unit 19C sheep population that has felt a dramatic population decrease in recent years. The goal of this proposal is to transition Unit 19C general season sheep hunting to archery only.

Justification:

As our state sheep population continues to decline or remains low, archery can be a very valuable management tool that will maintain opportunity while reducing harvest impact.

During the 2022/2023 Board of Game meeting in Soldotna, a five year moratorium on nonresident hunters (Proposal 204) was passed because of significant concern that the sheep population was decreasing beyond sustainable limits despite Full Curl Management (FCM). While this five year moratorium will likely substantially decrease harvest, it will also decrease opportunity for nonresident hunters. Going forward, an alternative would be to change Unit 19C to archery only. This will likely have an even more dramatic effect on sheep harvest (archery hunt success rates for sheep are generally much lower). This will have zero adverse affect on opportunity because anyone who wants to hunt sheep in that area, including nonresidents will still be able to hunt. They will just have to use a bow instead of a rifle.

Of note, the success rate for nonresident hunting in these areas has been as high as 80% over the past five years and is consistently over 40% for resident hunters. These are extremely high success rates, higher

than those for many other species in many parts of the state. Transitioning this area to archery hunting would allow for true fair chase hunting with decreased success rates but will maintain opportunity for *anyone* who wants to hunt it (they would just use a bow now). Skilled hunters who know how to pursue and stalk sheep will still kill rams but the overall take will be reduced due the increased difficulty.

\*\*\*Regarding opportunity: in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and learning to shoot a bow. Those who wish to sheep hunt in Unit 19C who are not already among the thousands of Alaskans who enjoy bowhunting, can easily obtain equipment and proficiency. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks. This change will not adversely affect any hunters opportunity, it will just make the hunt a little more challenging and thereby decrease total harvest.

\*\*\*Precedent: There are examples, both in and outside Alaska of the success of archery only sheep areas. In In Alaska, DS140/141 and DS240/241, which are bowhunting only draw hunts for any ram in an easily accessible area, the success rate over a ten-year period was about 2–3 rams per year for almost 70 tags awarded each year, and only a small fraction of the rams that were killed in these hunts would be considered legal in a full curl only area. Specifically, in the Eklutna area, where almost 70 hunters per year are allowed to bow hunt for any ram in an easily accessible area, there is still a steady population of mature rams despite all the hunting pressure. This is an example of how archery hunting allows for tremendous amounts of hunting opportunity with minimal impact on the animal population.

Similarly, there are very popular and well accepted hunts in Canada including the Canmore “Bow Zone” and the Todagin Mountain area of British Columbia. Both are over the counter archery sheep hunts that have proven popular with hunters and very affective in expanding hunter opportunity while having minimal harvest affect.

**PROPOSED BY:** Paul Forward

(EG-F23-288)

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## **PROPOSAL 89**

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

Reopen the subsistence winter sheep hunts in Unit 19C as follows:

***Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)***

RS380

Oct. 1-Apr. 30

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

Reinstate:

**One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323**

RS380

Oct. 1-Apr. 30

This hunt was closed at the last Board of Game meeting along with closing the nonresident season against the opposition by Alaska Department of Fish and Game to this proposal of a five year closure to all hunters due to lack of biological reason for a closure. Reopening this hunt will allow local residents without use of aircraft traditional harvest of sheep. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition.

**PROPOSED BY:** Jeff Pralle (EG-F23-278)

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### **PROPOSAL 90**

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

Reopen the late season resident only subsistence sheep registration hunt RS380 in Unit 19C as follows:

Reinstate RS380 Dall sheep hunt.

#### **5 AAC 85.055 Unit 19C Sheep**

**Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited.** (no open season)

### **RS380**

#### **Oct 1-Apr 30**

**What is the issue you would like the board to address and why?** Reauthorize RS380. One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning September 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323.

The Alaska Department of Fish & Game advised the Board of Game in March of 2023 that there is no biological reason to close this hunt as well as the general season hunt for Dall sheep. Reopening this hunt will allow LOCAL residents to traditionally harvest sheep for subsistence needs. Historical use and harvest of RS380 is low with an average of two sheep taken a year. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition. The low harvest has no detrimental effects on the overall sheep population.

**PROPOSED BY:** Spencer Pape (EG-F23-300)

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## **PROPOSAL 91**

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

Modify sheep hunting opportunity in Unit 19C or other subunits in the western Alaska Range by implementing a sheep management plan as follows:

#### Unit 19C Sheep Hunting

Guided nonresident bag limit- *management plan recommendation*

Non-guided nonresident nag limit- *management plan recommendation*

Resident nag limit- *management plan recommendation*

Subsistence hunt bag limit- *management plan recommendation*

Youth hunt bag limit- *management plan recommendation*

\*\*\*\*\*

Guided nonresident season- *management plan recommendation*

Non-guided nonresident season- *management plan recommendation*

Resident season- *management plan recommendation*

Subsistence season- *management plan recommendation*

Youth hunt season- *management plan recommendation*

\*\*\*\*\*

#### Sheep hunting Methods and Means-

Guided nonresident- *management plan recommendation*

Non-guided nonresident- *management plan recommendation*

Resident- *management plan recommendation*

Youth hunt- *management plan recommendation*

**What is the issue you would like the board to address and why?** This proposal is designed to provide a vehicle to address significant weather driven sheep declines in the western Alaska Range. In response to sheep declines the board has closed nonresident sheep hunting only for nonresidents for a period of five years. This closure is only allocative in nature and will not result in positive conservation outcomes for depleted sheep populations in the affected area.

The Alaska Professional Hunters Association (APHA) supports a more holistic and comprehensive approach to sheep management and conservation. The APHA is on record supporting the development of a western Alaska Range sheep management plan that could be limited to Unit 19C or expanded to other Unit subunits in the western Alaska Range. This proposal is designed to be a vehicle to be amended to incorporate the portions of such a plan that require Board of Game action.

**PROPOSED BY:** Alaska Professional Hunters Association

(EG-F23-259)

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## **PROPOSAL 92**

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

Close all nonresident sheep hunting in Unit 19 as follows:

Close all nonresident hunts for sheep in Unit 19.

**What is the issue you would like the board to address and why?** Declining numbers of legal rams in Unit 19. Over hunting plus harvesting of sub legal rams by guided nonresident hunters.

**PROPOSED BY:** Chris Bouch

(EG-F23-171)

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## **PROPOSAL 93**

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

Lengthen the resident and nonresident brown/grizzly bear season in Unit 19C by opening the season on August 10 as follows:

Unit 19B, 19C BOTH RESIDENT AND NONRESIDENT HUNTERS:

ONE BEAR EVERY REGULATORY YEAR **AUG.10** [SEPT.1]-MAY 31.

Lengthen the brown/grizzly bear season in Unit **19B and 19C** to open **August 10th**. Current bag limit to remain the same at one bear every regulatory year.

**What is the issue you would like the board to address and why?** Over the course of the last five to six years, while hunting and also while out flying in large portions of Unit 19B and 19C, I have witnessed an increasing number of brown/grizzly bears. Units 19B and 19C have significantly shorter open seasons for brown/grizzly bears than do the other three corresponding subunits, as well as having a one bear per year bag limit as opposed to a two bear per year bag limit found in the other three subunits. Considering the impact that bears are known to have on moose and caribou calf survival rates, and to an extent sheep as well, and in light of the recent decline in caribou and sheep numbers in some parts of Units 19B and 19C I would like to see the brown/grizzly bear season lengthened. This would allow additional hunting opportunity as well as helping to manage the current brown/grizzly bear population.

**PROPOSED BY:** Drew Hilterbrand

(EG-F23-180)

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## **PROPOSAL 94**

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

Lengthen the brown/grizzly bear season by opening the hunt in the fall on the same day as the sheep and caribou seasons and closing the hunt on June 30 as follows:

Change Brown/grizzly bear season dates to coincide with sheep and caribou season opener in the fall and extend it to the end of June do to the amount of snowpack in Unit 19C each spring. It is hard to get around in Unit 19C until after the snow has melted making June a prime time to hunt Grizzly bears. I propose making changes to reflect the same dates as subunits 19A, 19D and 19E. Dates changed annually to 8/10-6/30.

**What is the issue you would like the board to address and why?** Season dates for brown/grizzly bear in Unit 19C. With the growing concerns of the ungulate population in Unit 19C and changes taken to ungulate harvest (moose and sheep). Making the grizzly season uniform for the entire unit like it is in sub units 19A, 19D and 19E. While hunters are in the field they should have the opportunity to help manage the Grizzly population for the entire hunting season.

**PROPOSED BY:** Anthony Marchini

(EG-F23-189)

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## **PROPOSAL 95**

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

Lengthen the brown/grizzly bear hunting season in Unit 19C as follows:

I am proposing a change to the season dates for brown/grizzly bear in Unit 19C. The season dates for Units 19A, 19D, 19E and the Aniak drainage within Unit 19B, have seasons open to the hunting of brown/grizzly bears of August 10 - June 30. I propose that the brown/grizzly bear hunting season within Unit 19C be amended to fall inline with the other season dates within Unit 19.

The extension of this season may reveal two benefits; firstly, based on the Board of Game (BOG) decision at its meeting in Soldotna (March 2023) regarding Dall sheep hunting in Unit 19C shows that there is an obvious concern for the increased sheep mortality. Lengthening the brown bear season in Unit 19C, with a season open date of August 10 will provide hunters the opportunity to harvest a brown bear while afield for dall sheep. Secondly, by also lengthening the season in the spring to June 30, which would provide a more efficient means of hunting bears after the snow pack has dissipated, will hopefully lead to a higher hunter harvest and help reduce predation of the ungulates that the BOG is trying to protect in Unit 19C, based on the approval of amended Proposals 204 and 205

**What is the issue you would like the board to address and why?** Lengthen the season dates of brown/grizzly bear hunting in Unit 19C to Aug. 10 - June 30.

**PROPOSED BY:** Jake Lamphier

(EG-F23-198)

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## **PROPOSAL 96**

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

Lengthen the resident and nonresident brown/grizzly bear hunting season by changing the start date to August 10 as follows:

Lengthen the hunting season for brown/grizzly bear in Unit 19C as follows:

#### **AAC 85.020(18) Unit 19(C) Brown/Grizzly Bear.**

Brown/grizzly bear for both residents and nonresidents in Unit 19C. One bear every regulatory year. Open Season: **August 10** [September 1]– May 31.

If nothing is done, the brown/grizzly bear population will continue to increase, which will have a negative effect in the carrying capacity for all wildlife in Unit 19C. Furthermore, this increase in brown/grizzly bears will have a negative impact on all ungulate populations. Ungulate populations will struggle to

rebound or even maintain there current numbers and the department will have to confiscate or destroy any defense of life or property (DLP) or problem bear.

**What is the issue you would like the board to address and why?** Lengthen the hunting season for Brown/Grizzly bears in Unit 19C. Currently the season is September 1-May 31. Lengthen the season to August 10-May 31. In the pastfive years I have personally witnessed a steady increase in the population of brown/grizzly bears in Unit 19C and a steady decrease in Bison, Moose, Caribou and a sharp decrease in Dall sheep. Causing ADF&G to decrease the number of bison permits issued from 30 to 20 and the Board of Game (BOG) to implement a nonresident moose draw within the registration hunt area of Unit 19C and furthermore a complete shutdown of nonresident Dall sheep hunting in Unit 19C. I've watched numerous brown/grizzly bears take down bison calves, moose calves and Dall sheep lambs in the spring and have had multiple Dall sheep stalks blown by brown/grizzly bears. While brown/grizzly bears aren't overly successful in the catching of Dall sheep in the fall, the constant harassment of getting pushed off good grazing ground has detrimental effects to the sheep in the long run. Having brown/grizzly bear season coincide with Dall sheep and caribou, will allow hunters to harvest a brown/grizzly bear that they wouldn't necessarily be able to otherwise. Harvesting a brown/grizzly bear in August will in turn help all ungulates in Unit 19C. Secondly, the early season will allow the lawful take of any problem or defense of life and property (DLP) bear that a Dall sheep hunter or caribou hunter might encounter.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, and Jeff Rost (EG-F23-212)

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## **PROPOSAL 97**

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

Lengthen the brown/grizzly bear hunting season and increase the bag limit in Unit 19C as follows:

I propose changing brown bear harvest take of one bear every regulatory year from September 1st to May 31st to a two brown bear harvest take every regulatory year from August 10th to June 30th.

It would read: 2 bears every regulatory year. August 10th-June 30th.

**What is the issue you would like the board to address and why?** The issue I would like the board to address is the over population of brown bears in Unit 19C which is having a negative effect on dall sheep, moose and caribou populations in this unit.

**PROPOSED BY:** Steve Johnson (EG-F23-251)

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## **PROPOSAL 98**

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

Lengthen the brown/grizzly bear hunting season in Unit 19C by one month to align with Units 19A, 19D, and 19E as follows:

Change the season dates of brown/grizzly bears in Unit 19C to 8/10 - 6/30 which aligns with neighboring Units 19A, D, and E.

**What is the issue you would like the board to address and why?** Season dates of 9/1 - 5/31 for brown/grizzly bears in Unit 19C. Recent closure for nonresident sheep hunting in Unit 19C was implemented due to a severely depressed population. Moose and caribou in the area have been struggling as well due to predation and hard winters with elevated snowpack. Opening the season on September 1st prevents the majority of sheep hunters from opportunistic harvest of a brown/grizzly bear when they're still in the field. Additionally, closing the season May 31st prevents access to areas which have been receiving elevated snow levels that do not recede fully until the following month.

**PROPOSED BY:** Kyle Virgin

(EG-F23-271)

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## **PROPOSAL 99**

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

Open the brown/grizzly bear hunting season in Unit 19C for residents and nonresidents on August 10 as follows:

#### **5 AAC 85.020(18) Unit 19(C) Brown/Grizzly Bear.**

Brown/grizzly bear for both residents and nonresidents in Unit 19C. One bear every regulatory year. Open Season: **August 10** [SEPTEMBER1]– May 31.

If nothing is done, brown/grizzly bear population will continue to increase, which will have a negative effect on calf/lamb survival. This increase in brown/grizzly bears will have a negative impact on all ungulate populations and will struggle to rebound from a harsh winter.

**What is the issue you would like the board to address and why?** Increase in bear sightings and moose calf and bison calf survival concerns. Extend the hunting season for Unit 19C brown/grizzly bears. Existing season is September 1 - May 31. Extending the season will allow hunters more time to potentially take bears helping with calf survival for all ungulates.

ADF&G has reduced the number of bison permits issued from 30 to 20 and a nonresident moose draw within the registration hunt area of Unit 19C as well as the complete shutdown of nonresident Dall sheep hunting in Unit 19C. Reducing predation will help ungulate populations.

Solution: Change the hunting season for brown/grizzly bear in Unit 19C to August10 – May31.

**PROPOSED BY:** Jeff Pralle

(EG-F23-276)

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## **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 as follows:

For Alaska residents, brown bear in Unit 19E - no closed season.

**What is the issue you would like the board to address and why?** The Stony Holitna Advisory Committee proposes that for brown bear in Unit 19E there be no closed season for residents.

The brown bear season is presently August 10 – June 30. It is closed 41 days.

- Large areas of game habitat have been depleted due to multiple wildfires in recent years.
- The Kuskokwim is experiencing poor salmon runs
- Moose predation is high making stock increases low or non-existent.
- Brown bears, (and black bear), have been foraging in villages and picking fishnets and smoke houses, creating a safety concern for humans.
- When village and other local residents are forced to kill bears out of season to defend life and property, they are required by law to salvage the hides and skulls, and turn them over to ADF&G. This requires much work and time – these animals should remain the property of the person who killed it.

**PROPOSED BY:** Stony Holitna Fish and Game Advisory Committee

(HQ-F23-025)

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## **PROPOSAL 101**

### **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 taken over bait in Unit 19C, and to be taken at a bait site the same day a hunter has flown as follows:

Allow the harvest of brown/grizzly bear at bear bait stations in Unit 19C as follows:

### **5 AAC 92.044(1)(13), Unit 19C**

(1) a person may establish a black bear bait station, or a black and brown bear bait station in Units 7, 11, 12, 13, 14(A), 14(B), 14(C) remainder, 15, 16, 18, 19(A), **19(C)**, 19(D), 19(E), 20(A), 20(B), 20(C), 20(D) north of the Tanana River, 20(E), 20(F), 21(C), 21(D), 23, 24(C), 24(D), 25(C) and 25(D), only if that person obtains a permit under this section;

...

(13) in Units 7, 9, 11, 12, 13, 14(A), 14(B), 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26(B), and 26(C), a hunter who has been airborne may take or assist in taking a black bear at a bait station with the use of bait or scent lures under a permit issued by the department, and if the hunter is at least 300 feet from the airplane at the time of taking; in Units 7, 11, 12, 13, 14(A), 14(B), 14(C) remainder, 15, 16, 18, 19(A), **19(C)**, 19(D), 19(E), 20(A), 20(B), 20(C), 20(D) North of the Tanana river, 20(E), 20(F), 21(C), 21(D), 23, 24(C), 24(D), 25(C) and 25(D), a hunter who has been airborne may take or assist in taking a

brown bear at a bait station with the use of bait or scent lures under a permit issued by the department, and if the hunter is at least 300 feet from the airplane at the time of taking.

#### **Unit 19C open for brown/grizzly bear baiting April 15-May 31.**

**What is the issue you would like the board to address and why?** In recent years within Unit 19C we have seen brown/grizzly bears more frequently at black bear bait stations. In the past five years I have personally witnessed a steady increase in the population of brown/grizzly bears in Unit 19C and a steady decrease in bison, moose, caribou and a sharp decrease in Dall sheep. Causing ADF&G to decrease the number of bison permits issued from 30 to 20 and the Board of Game (BOG) to implement a nonresident moose draw within the registration hunt area of Unit 19C and furthermore a complete shutdown of nonresident Dall sheep hunting in Unit 19C. I've watched numerous brown/grizzly bears take down bison calves, moose calves and Dall sheep lambs in the spring and have had multiple Dall sheep stalks blown by a brown/grizzly bear. While brown/grizzly bears aren't overly successful in catching Dall sheep in the fall, the constant harassment of getting pushed off good grazing ground has detrimental effects to the sheep in the long run. Being able to harvest a brown/grizzly over a bait station will allow hunters to harvest a brown/grizzly bear that they wouldn't necessarily be able to otherwise. The harvest of a brown/grizzly bear will in turn help all ungulates in Unit 19C. If nothing is changed the ungulate populations will struggle to rebound and the department will have to confiscate or destroy any defense of life or property (DLP) or problem bear.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, and Jeff Rost

(EG-F23-210)

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#### **PROPOSAL 102**

**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.**

Open a fall bear bait season in Unit 19E as follows:

I am proposing a fall baited season from August 1st- September 30th for both black and grizzly bear. In the area of Unit 19E it's very thick bush and almost flat right on the river making a spot and stalk hunt difficult. Currently folks have to fly to the hills to find success hunting bears as a spot and stalk method. If a fall baited season was open it would greatly help the opportunity in harvesting bears on the Holitna River and get the numbers in check. Also accessing the river and baits in the fall is much easier. Not only that but the bugs are gone for the most part making hunting in the fall more attractive. Help us help the moose population!

**What is the issue you would like the board to address and why?** Too many bears. It's clear and evident that Unit 19E and our area on the Holitna River has a very healthy predator population. I live on the Holitna River and in the spring, we see moose calves arrive and in a lot of cases they quickly disappear. Often, we witness a cow with two calves and three days later one and then a few days later none. We do as well see a lot of predators at our place and up and down the river. In the area of Unit 19E from what we see there is a great abundance of bears.

The spring baited season is ok for baiting to help thin out these predators however the spring thaw sometimes limits people from being able to access the area. Sometimes the river doesn't open till the second week of May and then the rest of the month is high water making it not only difficult to access the area but difficult to bait. June the water levels come down but by then we are busy focusing in on working

with our fishing clients. Not only that but the bugs in June can be really bad and at that point no one wants to sit on a bait for hours on end.

These factors make it difficult for a lodge/outfitter to make it attractive for nonresidents to come and help us with a population problem. Therefore, we are hardly able to help make any dent in the population. If this continues the moose population will continue to struggle.

**PROPOSED BY:** Daniel Paull

(EG-F23-196)

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### **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 from three to five as follows:

Black bear bag limit for Units 19B and 19C is five bears for both residents and nonresidents.

OR

Black bear bag limit for Unit 19 is five bears for both residents and nonresidents.

**What is the issue you would like the board to address and why?** The Stony Holitna Advisory Committee proposes an increase in the resident and nonresident black bear bag limit in Unit 19B and 19C to five bears.

The bag limit in these two subunits is presently three bears.

Units 19A, D, and E have a five-bear bag limit.

- There is a surplus of bears throughout Unit 19
- At the 2020 Interior Region Board of Game (BOG) meeting, the Stony Holitna Advisory Committee made Proposal 106 to activate a lethal bear predation control in eastern Unit 19E, mostly along the Stony River, between the villages of Stony River and Lime Village (which is already part of the intensive management plan in Units 19E and 19A). The proposal failed due to perceived ineffectiveness due to limited habitat in that area, as well as the huge cost for that sort of program.
- Large areas of game habitat have been depleted due to multiple wildfires in recent years.
- The Kuskokwim is experiencing poor salmon runs.
- Moose predation by bears is high and increasing.
- Both black and brown bears have been foraging in villages and picking fish nets & smoke houses, creating a safety concern.
- A five-bear bag limit in Units 19B and 19C will make the bag limit for black bears consistent throughout Unit 19.

**PROPOSED BY:** Stony Holitna Fish and Game Advisory Committee

(HQ-F23-023)

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## **PROPOSAL 104**

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

Remove the requirement for a general season black bear harvest ticket in Unit 19D as follows:

The new regulation would not include the requirement for a harvest ticket for black bears in Unit 19D.

**What is the issue you would like the board to address and why?** We would like to remove the harvest ticket requirement for black bears in Unit 19D. This requirement places an unnecessary burden on hunters and Fish and Game gets the information they need through the sealing process. Harvest tickets expire in the middle of the summer and this causes confusion with the public. If a hunter sees a bear on July 1st but they don't have a new harvest ticket they can't shoot the bear which is a missed opportunity.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee (EG-F23-239)

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## **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 taken over bait in Unit 21A as follows:

Allow for the harvest of both black & brown/grizzly bears with the use of bait stations in Unit 21A.

The harvest season utilizing bait stations for the harvest of both black & brown/grizzly bears will overlap with the general hunting season that will include a bear baiting season open from April 15th through June 30th as well as from August 10th through October 31st of each calendar year.

All general permits and regulations for bear baiting across the state will apply to Unit 21A including the provision that nonresident hunters targeting brown/grizzly bears with the use of a bait station must be accompanied with a registered guide.

**What is the issue you would like the board to address and why?** Black and brown/grizzly bear hunting is allowed in Unit 21A from August 10th through June 30th of the following calendar year.

Hunting black bears with the use of a bait station is allowed in Unit 21A from April 15th to June 30<sup>th</sup> however, there is no designation for hunting brown/grizzly bears with the use of a bait station in Unit 21A.

Baiting stations that target black bears will most certainly draw in brown/grizzly bears in Unit 21A.

Currently there is very little harvest of brown/grizzly bears in Unit 21A, and there are no conservation concerns associated with any increase in harvest that would occur through the use of baiting.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee (EG-F23-238)

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## **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 or scent lures.**

Allow hunting of black and brown bear with the use of bait or scent lures in Unit 21E as follows:

Amend 5 AAC 92.044(b)(1) as follows:

(b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:

(1) a person may establish a black bear bait station, or a black and brown bear bait station in Units 7, 11, 12, 13, 14(B), 14(C), that portion of the remainder, of excluding Glacier Creek drainage outside of Chugach State Park, 15, 16, 18, 19(A), 19(D), 20(A), 20(B), 20(C), that portion of 20(D) north of the Tanana River, 20(E), 20(F), 21(C), 21(D), **21(E)**, 23, 24(C), 24(D), 25(C), and 25(D), only if that person obtains a permit under this section;

**What is the issue you would like the board to address and why?** The Grayling, Anvik, Shageluk, & Holy Cross (GASH) Fish and Game Advisory Committee (GASH AC) would like the board to allow hunting of brown/grizzly bears over bait in Unit 21E.

There is concern in the area that populations of brown/grizzly bear are increasing at a higher rate than local residents harvest brown/grizzly bears, and that brown/grizzly bears are encroaching into communities and presenting safety concerns. This proposal seeks to provide an opportunity for additional harvest by residents and nonresident hunters of brown/grizzly bears over bait stations in Unit 21E.

**PROPOSED BY:** Grayling, Anvik, Shageluk, & Holy Cross (GASH) Fish and Game Advisory Committee (EG-F23-260)

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## **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 as follows:

Brown/grizzly bear to be taken at a bear bait station in Unit 21E from April 15th-June 30th (spring) and August 10th-October 15th (fall). Hunters must comply with seasons, bag limits, salvage, and sealing requirements for brown/grizzly bears.

**What is the issue you would like the board to address and why?** The brown/grizzly bear population has grown over the past few years in Unit 21E. With the lack of salmon returning to the Yukon River and its tributaries it is causing the brown/grizzly bears too prey upon moose more often as a result. Although Unit 21E has a two brown/grizzly bear bag limit for residents there is still a low harvest rate. The rivers and streams, where most of the bears inhabit, are heavily timbered making it difficult to spot and stalk bears. Opening a spring and fall baiting season will provide a more effective method for hunters to hunt the denser forest while also allowing hunters to observe the bears longer allowing for a more selective harvest of older mature bears. This unit is directly adjacent to units of similar characteristics where the taking of grizzly bears at a black bear bait station is currently permitted.

**PROPOSED BY:** Blair Hickson (EG-F23-200)

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## **Tok Area - Units 12 & 20E**

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### **PROPOSAL 108**

#### **5 AAC 92.113. Intensive Management Plans III.**

Reactivate wolf control in a portion of Units 12, 20D, and 20E to benefit moose as follows:

Re-implement same day airborne (SDA) wolf control within the portion of Unit 12, within the upper Mansfield Creek drainage, the portion of Unit 20D within the upper Sand Creek, upper Billy Creek and upper Healy River drainages, and the portion of Unit 20E within the Fortymile River Drainage excluding the portions of the North Fork upstream of it's confluence with the Middle Fork, the Mainstem downstream of the confluence of the North and South Forks, the Walker Fork and the East Fork of the Dennison. This is an approximate area that is currently being discussed and refined with ADF&G to manage moose primarily within the Tok West and Taylor Corridor moose survey areas.

Allow SDA shooting from private fixed wing aircraft, retrieval of wolves with private rotorcraft and placement of wolf traps and snares with private rotocraft. In addition, the department may remove wolves using helicopters if necessary to supplement private efforts to meet wolf removal objectives.

Current moose densities in southern Unit 20E offer adequate hunter opportunity and are below the carrying capacity of the habitat. Rather than trying to continue to increase the population to a higher level closer to carrying capacity, we recommend ADF&G manage for a level of wolf removal adequate to maintain this productive population near current levels, the bull:cow ratios above objectives, and moose hunter numbers, harvest and success rates near current levels.

We recommend using moose density thresholds to determine when to turn wolf control on and off, and when to harvest cows, to maintain the moose population near current levels (~1.0 – 1.4 moose/sq. mile). For example, if the moose population falls below 1.0 moose/sq mile in 2 consecutive annual fall moose surveys in the Taylor Corridor moose survey area, the department would activate wolf control (private and possibly department) for several years to reduce wolves in the proposed control area and allow the moose population to rebound. If the moose density increases and exceeds 1.2 moose/sq mile in the Taylor Corridor moose survey area for two consecutive years, suspend wolf control and continue to monitor the moose population in subsequent years. As long as the moose population remains above 1.0 moose/sq. mile keep wolf control suspended. And if the moose population continues to increase and exceeds 1.4 moose/sq mile in the Taylor Corridor moose survey area for two consecutive years, consider issuing a small number of cow moose permits to maintain the moose population between 1.0 – 1.4 moose/sq. mile and keep the bull:cow ratio within objectives. Antlerless moose permits can be issued under Unit 20E antlerless moose regulations adopted by the Board of Game in spring of 2022.

We worked with the department to identify this proposed control area, so wolf removal from this area will not interfere with their wolf study in western Unit 20E, within the Fortymile Caribou calving range or have an effect on the population trend of the Fortymile Caribou Herd, which is currently in decline. This proposal is specifically intended to be used for Intensive Management for moose.

In addition, as part of a holistic moose management program, we recommend ADF&G work with Tok forestry to allow wildland fires to spread and develop and implement prescribed fires in southern Unit 20E and northern Unit 12 where possible and implement a regular program to crush or roller chop ~200

acres each winter in road or trail accessible portions of this area that burned in 2004 and 2005 to maintain moose habitat.

**What is the issue you would like the board to address and why?** Following the suspension of wolf control to benefit Fortymile Caribou under the Upper Yukon–Tanana Predation Control Program (UYTPCP) in RY2018, we have concerns about being able to maintain moose numbers at an adequate level, in the southeast portion of the UYTPCP area (southern Unit 20E and northern Unit 12), to continue to meet bull:cow ratio objectives, maintain the moose population at current levels and maintain current harvest levels and success rates in this area. Wolf control was conducted in this area under the UYTPCP for 14 years (January 1, 2005 – April 30, 2018) and resulted in substantial progress toward Intensive Management (IM) moose population and harvest objectives and increased success rate among moose hunters in this IM area. Without continued wolf control in this heavily hunted area, we believe the wolf predation on moose will increase and the moose population size and bull:cow ratios will fall below objectives, requiring ADF&G to implement more restrictive moose hunting regulations in the future.

Based on ADF&G staff reports of data collected on moose in the Tok West and Taylor Corridor moose survey areas (that are mostly within the proposed IM area) the calf:cow ratios have declined and the moose population trend has stabilized, or may be starting to decline slightly, since the suspension of the wolf control program in the UYTPCP area in spring of 2018. In addition, the bull:cow ratio has declined and approached the minimum management objective in recent years with increased hunter numbers.

It has taken a lot of years for this moose population to increase to current levels and we don't want to lose the progress made since the early 2000s.

In 2014, when the department removed moose from the existing UYTPCP we were told by department staff that it would be easy to put moose back into the control program if needed in the future. With the substantial increase in hunter use of this area in recent years, bull:cow ratios have declined to levels near the minimum bull:cow ratio objective. Wolf control is needed in this area to maintain the moose population near the current size to ensure the bull:cow ratio remains above the minimum objective to avert the need for additional moose harvest restrictions. More restrictive harvest regulations would result in reduced harvest levels and reverse the progress we have made toward the IM moose population and harvest objectives from the recent wolf control program in this important Intensive Management area.

**PROPOSED BY:** Upper Tanana/Fortymile Fish and Game Advisory Committee (EG-F23-227)

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*Note: The Board of Game can only allow the take of wolf same day airborne under a predator control plan for which a permit is required.*

### **PROPOSAL 109**

#### **5 AAC 92.113. Intensive Management Plans III.**

Allow wolves to be taken in Unit 12 the same day a person has been airborne as follows:

You may hunt wolf in Unit 12 the same day you have flown, provided you are 300 feet from the airplane.

**What is the issue you would like the board to address and why?** Over the past several years we have seen an increase in predation on sheep and moose due to multiple very large packs of wolves and multiple singles. It is becoming more common to see and hear these packs on a regular basis. A change to liberalize the hunting regulations allowing more opportunity for incidental harvest will help ungulate populations.

**PROPOSED BY:** Jeff Burwell

(EG-F23-220)

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### **PROPOSAL 110**

#### **5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(18) ...		
Unit 20(E), remaining portion of the Ladue River Controlled Use Area		
RESIDENT HUNTERS ...		
1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or	Aug. 5–Sept. 5 Oct. 15–Nov. 30	
1 antlerless moose by drawing permit only; up	Oct. 15–Nov. 30	

to 400 permits may be issued;  
a person may not take a cow  
accompanied by a calf

#### NONRESIDENT HUNTERS:

...

1 antlerless moose by  
drawing permit only; by youth  
hunt only; up to 100 permits  
may be issued in combination  
with the nonresident drawing  
hunt; a person may  
not take a cow accompanied  
by a calf

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

Unit 20(E), that portion outside of  
the Ladue River Controlled Use  
draining into 1) the Ladue River  
upstream of the South Fork of the  
Ladue River, 2) the Dennison Fork of  
the Fortymile River, and 3) the  
Mosquito Fork of the Fortymile River  
drainage.

#### RESIDENT HUNTERS

...

1 antlerless moose by  
drawing permit only; by youth  
hunt only; up to 100 permits  
may be issued in combination  
with the nonresident drawing  
hunt; a person may  
not take a cow accompanied  
by a calf; or

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

1 antlerless moose by  
drawing permit only; up  
to 400 permits may be issued;  
a person may not take a cow  
accompanied by a calf

Oct. 15–Nov. 30

#### NONRESIDENT HUNTERS:

...

1 antlerless moose by  
drawing permit only; by youth  
hunt only; up to 100 permits

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

may be issued in combination  
with the nonresident drawing  
hunt; a person may  
not take a cow accompanied  
by a calf  
...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The Unit 20E antlerless moose hunts were originally adopted by the Board of Game in March 2022 as a proactive management tool with the primary goals to 1) slow population growth to avoid habitat damage, 2) help achieve Intensive Management (IM) harvest objectives, and 3) provide the management flexibility to rapidly respond to changes in nutrition.

The decision framework to initiate antlerless harvest in Unit 20E includes population trend, bull:cow ratios, and nutritional indices. The moose population within a 1,821 mi<sup>2</sup> area along the Taylor Highway in southern Unit 20E approximately doubled from 0.7 moose/mi<sup>2</sup> in 2005 to 1.4 moose/mi<sup>2</sup> in 2018, although the population appears to have stabilized since then. Bull:cow ratio estimates in southern Unit 20E are currently stable above the minimum management objectives. Finally, nutritional indices show that the moose population is currently at healthy nutritional levels. Twinning rates are healthy at 42% (2020-2022, 3-year weighted average), and the department closely monitors these rates given the potential for them to lag as a reflection of population-level nutritional condition. Additionally, the estimated browse removal rate in spring 2022 was 28%, which is below the rate observed in nutritionally stressed populations.

Given the current stable population trend and bull:cow ratios and healthy nutritional indices, the department does not plan to enact antlerless hunts during RY24 but would like to retain the hunts as a proactive management tool. The Unit 20E antlerless harvest framework provides management flexibility to rapidly respond to potential future changes in nutrition and the ability to proactively reduce population growth rates, if necessary, to maintain the current high nutritional levels.

Current Unit 20E moose harvest is below IM harvest objectives; therefore, antlerless harvest, if enacted, would help achieve IM harvest objectives without reducing bull:cow ratios below management objectives. The Unit 20E IM harvest objective is 250–450 moose, and the RY18–RY22 annual average unit wide reported harvest was 199 moose.

**PROPOSED BY:** Alaska Department of Fish & Game (HQ-F23-045)  
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**PROPOSAL 111**

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

Add an archery only, five-day season for residents and nonresidents in Unit 12 as follows:

Extend the current moose season by five days in Unit 12 Remainder for certified bowhunters only as follows:

Unit 12, remainder

Residents only

Bag limit: One bull total (see details in season dates below)

Season dates: Aug 24 – Aug 28

**OR:**

Sept 8 – Sept 17

**OR:**

**SEPT 18 - SEPT 22 BY BOW AND ARROW ONLY**

Unit 12, remainder

Nonresidents

Bag limit: One bull, with 50-inch antlers or antlers with 4 or more brow tines on at least one side.

Season dates: Sept 8 – Sept 17

**OR:**

**SEPT 18 - SEPT 22 BY BOW AND ARROW ONLY**

**What is the issue you would like the board to address and why?** An additional five days for bowhunters in Unit 12 remainder would afford much greater hunting opportunity while at the same time keeping the impact to the resource to a minimum. This extension would be similar to already existing season extensions in the state for bowhunters.

**PROPOSED BY:** Alaskan Bowhunters Association

(EG-F23-293)

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## **PROPOSAL 112**

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

Limit nonresident hunting of the Fortymile caribou herd as follows:

Limit nonresident Fortymile caribou hunters to Zone 2 only until the herd is within the Intensive Management (IM) population objective and stabilizes.

#### **RC 860 Fortymile Caribou**

##### **Nonresidents**

**Zone 2 only** [Zones 1, 2, 3, &4]      One bull      Aug 10 – Sept 30

We would also support including parts of Zone 3 off the road system included for nonresidents, such as the Joseph area, and Fortymile River upstream of the South Fork.

**What is the issue you would like the board to address and why?** The Fortymile caribou herd (FCH) is an identified big game prey population under our Intensive Management (IM) law important for high levels of human harvest by Alaskans. It has an IM population objective of 50,000 - 100,000 animals.

Based on department information at this time (April 2023), the 2023 fall quota for the Fortymile caribou hunt RC860 will only be 450-500 caribou, bull only. The current FCH population is well under the IM objective, at about 38,000 animals, yet caribou are showing signs of nutritional stress. We expect 2024 quotas to be even less.

Along with Nelchina caribou herd declines and very little harvest opportunity for that herd now and in the near future, we expect increased hunting pressure on the FCH. Added pressure on FCH will lead to more problems along the Steese and Taylor Highways, especially if the caribou are near the road during hunting season. The quota could be reached very quickly, allowing little opportunity for many residents to put some meat in their freezer. We could also go over the quota, which has happened in the past, resulting in a lower winter subsistence hunt quota or a closure of the resident-only winter subsistence hunt.

Our main emphasis with this proposal is to outline the importance of the FCH to resident Alaskans who want to put food on the table to feed their families. We question whether any nonresident hunting opportunity should exist at all when the population is below the IM objective, or when that additional harvest may lead to a winter subsistence hunt closure or reduced quota.

We have spoken to transporters and understand their concerns with a complete closure to nonresidents. In that light, we'd like to offer a compromise position at this time to restrict nonresident RC860 caribou hunters to Zone 2 only. This will still allow ample nonresident opportunity off the road system, and keep the road systems and other zones available to residents only.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F23-014)

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## **PROPOSAL 113**

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

Close caribou hunting within ¼ mile or 100 yards of the Steese Highway above tree line on Eagle and Twelvemile summits in Unit 20 as follows:

Include a hunt provision that closes fall hunting within 1/4 mile of the Steese Highway above treeline on Eagle and Twelvemile Summits. If the board is hesitant to institute a closure of 1/4 mile, a 100 foot area would probably be effective as well. This would decrease the likelihood of an accidental shooting, improve hunt quality by decreasing congestion/chaos, and help ensure that quotas are not exceeded. This approach has been taken on the Taylor Highway to address similar concerns. Since 2017, ADF&G has effectively implemented a no-hunt corridor between mileposts 75 and 117 when the herd approaches/crosses this area during the fall season.

**What is the issue you would like the board to address and why?** Since the 2020 fall caribou hunt, interest and participation along the Steese Highway has remained high. During the fall hunt, the roadway and immediately adjacent land is heavily used for ATV travel and camping. Public safety is threatened when hunting is also permitted in the same vicinity.

**PROPOSED BY:** Sarah Behr

(EG-F23-313)

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## **PROPOSAL 114**

### **5 AAC 92.011. Taking of game by proxy.**

Allow proxy hunting for caribou in Units 20B, 20D, 20E, 20F, and 24C registration hunts as follows:

You may proxy hunt for caribou in Units 20B, 20D, 20E, 20F, and 25C caribou registration hunts (RC860 and RC867)

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

You may proxy hunt for caribou [except]

- In Units 20B, 20D, 20E, 20F, and 25C caribou (RC860 and RC867)

**PROPOSED BY:** Roy Flemmer

(HQ-F23-020)

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## **PROPOSAL 115**

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

Require hunters taking Fortymile caribou to gut the animals in the field as follows:

Hunters shall gut their kills in the field. Such a provision would provide Alaska Wildlife Troopers with a kill site, minimize spoilage, improve roadway safety, and improve the image of the hunt.

**What is the issue you would like the board to address and why?** While the Fortymile Management Plan does suggest a hunt provision requiring participants to remove viscera from the drivable surfaces of the roadway, this frequently does not happen. Carcasses are also often left in ditches and in the pull outs on top of Eagle and Twelve Mile Summits. This detracts from the hunt, can be unpleasant for people using the pull outs, and also attracts other animals to the roadway and ditches, which can be unsafe for motorists.

**PROPOSED BY:** Sarah Behr

(EG-F23-312)

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## **PROPOSAL 116**

### **5 AAC 92.126. Non-Intensive Management Predator Control Plans.**

Implement a non-intensive management predator control plan within the Tok Management Area to benefit Dall sheep as follows:

Implement a non-intensive management predator control plan within the Tok Management Area (TMA) via aerial coyote and wolf control. Aerial coyote and wolf shooting would be allowed via private fixed wing aircraft and retrieval of coyotes and wolves would be allowed via private rotorcraft. In addition, the Department could remove coyotes and wolves using helicopters if necessary to supplement private efforts to meet removal objectives.

Our goal for predator control is to help the sheep population recover to historic averages more quickly than if intervention did not occur. We propose predator control be conducted until the sheep population recovers to the long-term (2006–2019) averages. Alternatively, we propose predator control cease following five years if there are no signs that the control is positively impacting population growth.

**What is the issue you would like the board to address and why?** The Tok Management Area (TMA) sheep population, like many sheep populations throughout Alaska, is currently at a historic low. The total number of sheep observed by the department during their 2022 survey within the TMA survey area was 457, which is 60% fewer than the 2006–2019 average of 1145 sheep. Furthermore, the number of sheep observed in 2022 was 45% fewer than the previous low number of sheep observed in 2014, which followed the very late spring in 2013. The current population decline resulted in a historic low number of draw sheep permits awarded during fall 2022 and fall 2023. Prior to these years, the lowest number of permits awarded was 60, while only ten permits were issued annually during 2022 and 2023.

Although we recognize that weather was likely the primary contributing factor to the current decline, predation is likely an additional contributing factor. According to department sheep research conducted in Unit 20A during the early 2000s, coyotes are one of the primary predators of lambs, while wolf predation also occurs albeit at a lower level. We believe managing predation could help the TMA sheep population recover.

**PROPOSED BY:** Upper Tanana/Fortymile Fish and Game Advisory Committee

(EG-F23-224)

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## **PROPOSAL 117**

### **5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.**

Allocate Tok Management Area sheep drawing permits as follows:

10% of the total number of Dall sheep permits in the Tok Management Area are guaranteed to nonresidents. If there are less than ten permits issued, there will be none issued to nonresidents. No more than 20% of the nonresident permits will be issued to second degree of kindred nonresidents with a separate draw permit number.

**What is the issue you would like the board to address and why?** I want to clarify that 10% of the drawing permits for Dall sheep in the Tok Management area are guaranteed to nonresidents. I think they already are but I'm not positive. Also remove the language that states up to 50% of the nonresident permits may be issued to second degree of kindred hunters. Instead apply the language from Proposal 149 from the Statewide meeting in March of 2021 of no more than 20% of the nonresident permits will be issued to second degree of kindred nonresidents with their own draw permit number.

**PROPOSED BY:** Dan Montgomery

(EG-F23-324)

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## **PROPOSAL 118**

### **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.**

Allocate a portion of the Tok Management Area sheep drawing permits to archery only, or create a new archery only hunting the area as follows:

Allocate 20% of the total DS102 tag allotment each year to a separate tag that is archery only for the same area. If managers see fit, this archery hunt could take place during the same time as the general DS102 hunt or could take place during a separate time period.

Option 1:

20% of the total number of DS102 tags that would currently be allotted will be re-allocated to a new drawing hunt. **One full-curl ram by bow and arrow only 8/10-9/20.**

Option 2:

20% of the total number of DS102 tags that would currently be allotted will be re-allocated to a new drawing hunt. **One full-curl ram by bow and arrow only 8/1-8/10.**

**What is the issue you would like the board to address and why?** This proposal is one of several written this year with the intention of **maintaining hunting opportunity for all hunters while decreasing harvest on sheep populations.**

The current tag allotment for DS102 is adjusted each year to accommodate the estimated harvestable surplus of sheep in this area. This proposal is intended to maintain that number of tags but to allocate 20% of them each year to archery only. Because of the increased difficulty of archery hunting this will shield

an overall decrease in harvest which, over time, may result in more sheep being available for harvest in future year. Similarly, in the event that sheep population does decline, wildlife managers may be able to maintain the number of tags because of the overall decrease harvest rate of tag holders (due to 20% of them being archery hunters who will have lower success rates.) Over time this could demonstrate the effectiveness of using archery as an effective management tool for sheep hunting in Alaska.

Overall, this will maintain opportunity while decreasing harvest and thereby enhancing the overall resource for future generations of hunters.

\*\*\*Of note, in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and layering to shoot a bow. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks.

**PROPOSED BY:** Paul Forward

(EG-F23-292)

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## **PROPOSAL 119**

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

Set the sheep bag limit in Unit 12 for resident hunters based on the age of the ram harvested as follows:

Ideally the below regulation would also apply to hunting guides who would have to skip a season or more of guiding if their clients kill a ram under 8-years of age.

Unit 12 Resident:

Harvest of a ram 8-years-old or older and hunter will be eligible to hunt sheep the next season.

Harvest a 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a 6-year or younger ram, and the hunter will be ineligible to hunt sheep for the next three seasons.

**What is the issue you would like the board to address and why?** In recent years there has been widespread concern raised about the harvesting of young rams during full-curl management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and BC, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska's sheep population has been noted to be on a steady decline and it's time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 in at the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under 8-years-old and if a few old outliers are removed from the from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5 years with a concerning number of 6 and even a 5-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2-years-old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change FCM regulation. Shooting a full curl 7-year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

**PROPOSED BY:** Paul Forward

(EG-F23-286)

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### **PROPOSAL 120**

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

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

Within Wrangell St Elias National Preserve in Unit 12, east of the Nabesna River, south of the winter trail, southeast from Pickerel Lake to U.S./Canadian border:

Increase the resident bag limit for brown bears to two bears per regulatory year.

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

Unit 12 east of the Nabesna River, south of the winter trail, southeast from Pickerel Lake to U.S./Canadian border

Resident

[ONE BEAR] **Two bears** every regulatory year

**What is the issue you would like the board to address and why?** Interior grizzly bears are an important food source for many resident hunters. There are abundant grizzly bears in Unit 12, and we'd like more harvest opportunity to put meat in our freezers.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

(EG-F23-218)

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## **PROPOSAL 121**

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

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

Unit 12. East of the Nabesna River and south of the winter trail running southeast from pickerel Lake to the U.S/Canada border.

Resident:                    2 Bear   every regulatory year.                    Aug 10-Jun 30

Nonresident:                1 Bear   every regulatory year.                    Aug 10-Jun 30

**What is the issue you would like the board to address and why?** I am asking the board to allow residents to harvest two grizzly bears per year in this unit/area. My family has been going into the area since the 70s and it has always held a healthy population of bears. We really enjoy bear meat (to the point my kids prefer over moose.) We salvage the whole bear when a harvest is made, and frankly, a second allowable bear would provide extra meat to be enjoyed over the winter (we make roasts, breakfast sausage, chorizo, kielbasa, smoked hams and meat sticks). Not to leave out the bear fat that gets rendered down for baking and frying.

**PROPOSED BY:** Jacques Etcheverry (EG-F23-203)

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## **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 as follows:

Unit 12 and 20E wolf hunting season, Aug 1- June 15th.

**What is the issue you would like the board to address and why?** Extend the wolf hunting season in Units 12 and 20E to June 15th. This would give the option to harvest wolves during a portion of the spring bear season. This would also provide for additional sustainable wolf hunting opportunity for those interested in harvesting wolves during spring and early summer.

**PROPOSED BY:** Upper Tanana/Fortymile Fish and Game Advisory Committee (EG-F23-226)

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## **PROPOSAL 123**

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

Lengthen the wolf hunting season by approximately six weeks as follows:

Currently:

Wolf- Ten Aug 1- April 30

Proposed:

Wolf- Ten Aug 1- June 15

**What is the issue you would like the board to address and why?** Over the past few years we have seen an increase in predation on moose and sheep by several very large packs of wolves and multiple singles. A change to the wolf season dates allowing for more opportunity while hunting other species will help increase ungulate populations.

**PROPOSED BY:** Jeff Burwell

(EG-F23-221)

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## **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 as follows:

Amend 5 AAC 84.270 (6) as follows:

(6) Marten

....

Units 12, 19[ -], 21, and 24 [AND 25] Nov. 10 – Last day of Feb. No Limit

**Unit 20(E) Nov. 10 – Mar. 15 No Limit**

**Remainder of Unit 20 Nov. 10 – Last day of Feb. No Limit**

**Unit 25(B) Nov. 10 – Mar. 15 No Limit**

**Remainder of Unit 25 Nov. 10 – Last day of Feb. No Limit**

**What is the issue you would like the board to address and why?** Extend marten trapping season by 15 days to align with the closure of Lynx trapping regulations in Unit 20E and 25B.

This will also align state and federal regulations to allow marten trapping until March 15.

With climate change and the prolonged length of spring, marten are staying prime longer. This will allow a small number of local trappers the opportunity to keep marten traps operational until lynx season closes and allow potential for modest income increase opportunity.

Extend marten trapping season by 15 days to align with the closure of Lynx trapping regulations in Units 20E and 25B.

This will also align state and federal regulations to allow marten trapping until March 15.

With climate change and the prolonged length of spring, marten are staying prime longer.

This will allow a small number of local trappers the opportunity to keep marten traps operational until lynx season closes and allow potential for modest income increase opportunity.

**PROPOSED BY:** Eagle Fish and Game Advisory Committee (EG-F23-215)

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## **Delta Junction Area – Unit 20D**

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### **PROPOSAL 125**

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

Change all general season harvest ticket moose hunts in Unit 20D to a registration permit as follows:

For all harvest ticket moose hunts in Unit 20D, change the [HT] under column heading “PERMIT/HUNT #\*” to “**RM \_ \_ \_**”, with ADF&G assigning one hunt number to replace all ten harvest ticket hunts.

**What is the issue you would like the board to address and why?** Given recent severe winter kill of moose in Unit 20D, which has extensive road-network access to hunting areas, high hunter effort and high harvest, better data is needed to aid in moose management. During 2018-2022, an annual average of 1014 hunters harvested 251 moose from this unit. Current harvest ticket hunts for moose in Unit 20D do not provide ADF&G biologists adequate hunter effort and harvest data to proactively manage the moose population. There are currently ten harvest ticket hunts in Unit 20D. Changing all harvest ticket hunts in Unit 20D to a single registration hunt, with a requirement to report the harvest to ADF&G within 14 days from the end of the season, will provide the department more accurate, reliable, and timely data upon which to base moose management decisions. It will also simplify the regulation booklet by reducing the number of different hunts to help maximize moose hunting opportunity and harvest, as well as make it easier for hunters to have the proper paperwork to hunt an area. Hunters would be able to obtain these permits at any ADF&G office or online.

**PROPOSED BY:** Delta Fish and Game Advisory Committee

(EG-F23-242)

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### **PROPOSAL 126**

#### **5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

<b>Units and Bag Limits (18)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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...

Unit 20(D), that portion lying  
west of the west bank of the  
Johnson River and south of the  
north bank of the Tanana River,  
except the Delta Junction  
Management Area and the Bison  
Range **Controlled Use Area**  
[YOUTH HUNT  
MANAGEMENT AREA]

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion in the Delta Junction Management Area; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25  
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10–Nov. 25  
(General hunt only)

...

Unit 20(D), that portion within the Bison Range Controlled Use Area

...

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf;

Sept. 1–Sept. 30  
(General hunt only)

Sept. 1–Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15  
(General hunt only)

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River; a person may not take a calf or a cow accompanied by a calf; or	Oct. 10–Nov. 25 (General hunt only)
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1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf	Oct. 10–Nov. 25 (General hunt only)
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NONRESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or	Sept. 1–Sept. 15
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...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually. The objectives of the Unit 20D antlerless moose hunts are to 1) stabilize population growth of this high-density moose population; 2) address concerns about range degradation, reduced nutritional condition of moose, and reduced reproductive success of moose; 3) make progress toward meeting the Unit 20D intensive management (IM) harvest objective of 500–700 moose; and 4) provide youth and disabled veteran hunting opportunity. These objectives are being met.

If antlerless moose hunts are not reauthorized, the moose population could quickly increase to levels beyond the ability of the habitat to support the moose population. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Additionally, the population may need to be reduced dramatically when new data are available and analyzed.

Antlerless moose hunts are offered in southwest Unit 20D, which has the highest moose density in the unit. This area has great potential for population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 30 years. Total moose harvest in all of Unit 20D averaged 225 moose (an average of 201 bulls and 24 antlerless moose) during regulatory years 2020 and 2021. No antlerless moose were harvested in RY22 and no harvest is planned for RY23.

Antlerless hunting opportunity and harvest is limited at present to help maintain this moose population at current densities and within the ability of the habitat to support the population. The largest antlerless harvest (n=113) that occurred in Unit 20D was in 2009, when antlerless hunts were first authorized for the

purpose to reduce population size and address moose nutritional concerns. Since 2011, the southwest Unit 20D population estimates (range = 2,500–4,500 moose), and bull harvest in southwestern Unit 20D (201–282) have been stable. The 2022 population estimate for southwest Unit 20D was 2,459 moose (corrected for sightability) with a density of 1.94 moose per square mile, 28 calves:100 cows and 23 bulls:100 cows. The 2022 population estimate is 40% lower than the 2020 estimate, likely due to increased mortality as a result of severe winter conditions during 2021–2022, which included deep snow and winter rain events. The department does expect nutritional indices to improve because of the current reduced population size. However, to maintain this moose population from experiencing nutritional stress in the future, a limited antlerless harvest may still be warranted in future years.

Continued antlerless harvest will likely be needed to maintain this population at the optimal density relative to habitat constraints and will contribute additional harvest towards meeting the IM harvest objective of 500–700 moose without reducing bull-to-cow ratios below management objectives. The current population trend suggest that low, consistent antlerless harvest provided by drawing permit hunts in Unit 20D, in conjunction with other mortality factors (including ceremonial harvest, vehicle collision, accidents, and predation), is appropriate to maintain population stability.

The Department of Fish and Game will continue to evaluate antlerless moose hunts and their effect on moose density and population growth. Future antlerless moose hunts will be implemented as needed based on the evaluation of three indices of density-dependent moose nutritional conditions in relation to changes in moose density: biomass removal of current annual growth on winter browse, proportion of females with twin calves, and late-winter calf weights.

Additional drawing or registration permits will be issued only if more harvest is needed in specific areas to maintain optimal moose densities.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-044)  
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## **PROPOSAL 127**

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

Expand the hunt area and change the bag limit for the Unit 20D youth moose hunt YM792, and eliminate the drawing hunt DM791 as follows:

Unit 20D, expand the YM792 hunt boundaries to the entirety of southwest Unit 20D including the Delta Junction Management Area (DJMA) and eliminate DM791 from regulation. Hunt Dates: Sept 16th-25th

Resident youth who will be 10-17 years old by the starting date of the hunt are eligible to apply, and can only hunt (with) a youth permit while they are 10-17 years old. Each permittee must be accompanied in the field by a licensed Alaska resident adult at least 21 years old.

One (1) Moose: antlerless moose permits (up to 100), by youth hunt (YM792) drawing permit only; up to ten Any Moose permits may be issued; a person may not take a calf or a cow accompanied by a calf; If the moose surveys determines there are a surplus of bulls, one any moose could be the bag limit for a portion of (example 1st-10th) successful applicants drawn. The remaining successful applicants' bag limit would be one antlerless moose.

Luck of the draw for bull tags. The bag limit (any moose or antlerless) and the number of permits will be a permit condition decided upon annually by the Delta area biologist based on most recent population and habitat surveys.

Example: The department determined it should harvest approximately 30 antlerless moose and has determined up to ten any bulls (Any Moose) could be harvested. Therefore, the department would issue 40 permits and the first ten applicants drawn would have the option to harvest. Any Moose, and the remaining 30 successful applicants could only harvest an antlerless moose.

Suggested language for the handy dandy:

Resident

20D

South of the north bank of the Tanana River and west of the west bank of the Johnson River, including the Delta Junction Management Area and the Bison Range Controlled Use Area

One moose by qualified youth hunters. Taking calves or cows accompanied by calves is prohibited.

YM792

Sept 16th–25th

Suggested language in the draw supplement:

Game Management Unit, Area20D, Southwest, Qualified Youth Residents Only

Hunt No.

YM792

Number of Permits

Up to 100

Season Dates

September 16th–25th

Legal Moose

Any Moose for the first 10 successful applicants drawn, except calves or cows accompanied by calves may not be taken.

Or

Antlerless for the remaining successful applicants. Taking calves or cows accompanied by calves is prohibited.

Specimens Required

Specimens may be required

Reporting Requirements if Successful

In person to ADF&G in Delta Junction within two days of kill

Additional Requirements and Information

Hunt Area: That portion of Unit 20D south of the north bank of the Tanana River and west of the west bank of the Johnson River.

See hunting regulations for motorized restrictions within the Bison Range Controlled Use Area. Bag limit will be determined by order drawn with up to 10 Any Moose permits being awarded.

(Table submitted with proposal)

Suggested language for the handy dandy:

R	20D	South of the north bank of the Tanana River and west of the west bank of the Johnson River, including the Delta Junction Management Area and the Bison Range Controlled Use Area	ONE MOOSE by <b>Qualified Youth Hunters</b> . Taking calves or cows accompanied by calves is prohibited.	YM792	Sept 16 <sup>th</sup> – 25th
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Suggested language in the draw supplement:

Game Management Unit, Area	Hunt No.	Number of Permits	Season Dates	Legal Moose	Specimens Required	Reporting Requirements if Successful	Additional Requirements and Information
20D, Southwest, Qualified Youth <b>Residents Only</b>	YM792	Up to 100	September 16th-25th	Any Moose for the first 100 successful applicants drawn, except calves or cows accompanied by calves may not be take.  Or  Antlerless for the remaining successful applicants. Taking calves or cows accompanied by calves is prohibited.	Specimens may be required	In person to ADF&G in Delta Junction within 2 days of kill	Hunt Area: That portion of Unit 20D South of the north bank of Tanana River and west of the west bank of the Johnson River.  See hunting regulations for motorized restrictions with the Bison Range Controlled Use Area  Bag limit will be determined by order drawn with up to 10 Any Moose permits being awarded.

**What is the issue you would like the board to address and why?** Simplify antlerless moose hunts in southwest Unit 20D.

In existing regulations, DM791 is an antlerless hunt in southwest Unit 20D. There is also a youth hunt (YM792) on the books that allows for bull and antlerless moose harvest, but in a very small area. With the recent severe decline in moose population, we are projected to issue fewer permits for the near future. Eliminating DM791, and expanding YM792 will provide a high quality youth hunt, and antlerless moose harvest while simplifying the regulations.

In January 2023, the department (ADF&G) presented a moose management workshop at which it confirmed that moose in Unit 20 suffered a significant population loss from the winter of 2021-2022.

The Delta Advisory Committee was asked how to move forward and make decisions for the future harvest of antlerless moose. (There are no antlerless hunts planned for this area in 2023, but future harvest may be needed)

The goal of the Delta AC is to create and maintain a productive and healthy moose population in southwest Unit 20D. This will be assessed through moose abundance and condition, habitat condition, and twinning rates as measured by the following surveys conducted by ADF&G:

- 1) Biennial geospatial population estimation (GSPE) moose population surveys
- 2) Annual calf twinning surveys
- 3) Short yearling calf weights
- 4) Browse removal surveys

Equipped with this information, the department will determine the number of antlerless permits to issue for southwest Unit 20D. These draw permits will be available through the expanded youth hunt (YM792).

The Delta AC recommends the harvest of bull moose also be included in this youth hunt. Adding the desired number of "Any Moose" (up to ten) permits to this hunt will provide opportunity for the youth to harvest a bull. Any moose permits will also allow the department to maintain the desired bull/cow ratio for the unit.

ADF&G staff has stated in moose management meetings that a bull/cow ratio of approximately 15/100 is sufficient for reproduction. However, many moose populations (including Unit 20D) are managed at 25 to 30 bulls per 100 cows to increase hunter satisfaction through seeing more bulls while hunting in antler-restricted areas. Keeping a close watch on bull/cow ratios will determine the number of bull of tags allocated for this hunt (up to ten). The allocation of ten or less tags to this (any moose) hunt should be sustainable most years. ADF&G reported the southwest Unit 20D bull/cow ratio to be at 25/100 based on their most recent survey in 2022.

These tags would be put into this proposed expanded youth hunt (YM792) that will be a high quality youth hunt to help manage our moose population into the future.

**PROPOSED BY:** Delta Fish and Game Advisory Committee (EG-F23-246)

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## **PROPOSAL 128**

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

Change the bag limit for the youth moose hunt YM792 to one bull as follows:

#### **Amended: "One bull by permit"**

Removed: [with spike-fork or 50-inch antlers or antlers with four or more brow tines on at least one]

**What is the issue you would like the board to address and why?** Would like consideration for YM792 youth hunt to consider expanding the bag limit to "any bull" in the event that the "antlerless" portion of the hunt is removed. This year's hunt (2023) removed antlerless due to the harsh winter the season before.

The bag limit for this season is now, “One bull per lifetime, with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side.” This extremely limits the youth hunters on chances of success. After speaking with Delta Junction fish and game, it was confirmed that the large majority of all moose taken on that hunt are antlerless. With only a four day window of hunting per permit, it is very limiting on success since the area is not very large and closed to motorized vehicles. Parents or guardians taking their youth on the hunt will not have the ability to cover as much terrain as needed to find a legal bull on this hunt. My understanding of the youth program is to get the next generation taught, excited and interested in the great resources we have in this state. My fear is that this year will result in a low success rate for all the YM792 hunters and/or the tags not even being hunted. Also, the rest of Unit 20D has the same bag requirements. So in a year where antlerless is removed from the youth hunt, the youth have no advantage other than the small areas bounded off to them. If the regulation for this youth hunt isn’t addressed, it could result in a significant drop in applicants and an even bigger drop in successful moose taken.

Suggest allowing motorized vehicles when the antlerless portion is removed to assist the maximizing the land area the youth can cover in the area.

**PROPOSED BY:** Lucas Wacker

(EG-F23-179)

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### **PROPOSAL 129**

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

Change the bag limit for the youth moose hunt YM792 as follows:

The YM792 Bison Range Youth Hunt Controlled Use Area hunt legal animal should be changed to one moose of either sex, excluding calves. At a minimum it should be changed to any bull.

**What is the issue you would like the board to address and why?** The YM792 Bison Range Youth Hunt Controlled Use Area legal animal should be changed to one moose of either sex, excluding calves. At a minimum it should be changed to any bull. According to the local fish and game officials in the area, there is a large population of moose in this area. This hunt is limited to ten tags only. This is an excellent opportunity to introduce children into the sport of hunting and I think that limiting the tag to a spike-fork or 50” or more bull is unnecessarily handicapping this hunt. While it is the responsibility of the adult hunter accompanying the child on the hunt, these restrictions also have a potential of placing a youth hunter at a larger risk of taking an illegal animal. This could have a devastating effect on their view of hunting moving forward. Overall, this is a once in a lifetime tag and opportunity for these children and I believe that they should not be limited so much on what they can harvest, especially in an area that can support the low number of harvests that would occur on this hunt.

**PROPOSED BY:** Kenneth Bowman

(EG-F23-187)

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## **PROPOSAL 130**

### **5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.**

Award up to 10% of permits for DS203 and DS204 to nonresidents, and remove the allocation between guided and nonguided nonresidents as follows:

Up to 10% of permits for each hunt (DS203 and DS204) shall be awarded to nonresidents by random draw from among all applicants, with no forced separation of nonresident permits between guided and 2DK. If the total number of nonresidents drawn is less than 10%, that is the number awarded to non-residents, with all remaining permits awarded to resident applicants. The total non-residents drawn will be from none to the 10% maximum. The suggested new language in the regulation would be:

#### **5 AAC 92.057**

(6) The department shall issue a maximum of 20 percent of the drawing permits allocated to nonresidents in (2), (3), **and** (4)[, AND (5)] of this subsection to nonresidents accompanied by a resident over 19 years of age who is the spouse or other relative of the applicant within the second degree of kindred, as described in AS 16.05.407(a).

**What is the issue you would like the board to address and why?** Resolve unintended consequences to ADF&G implementation of 5 AAC 92.057 provisions put in place due to 2022 Proposal 149. As a result of the adoption of Proposal 149, the AAC now states: “(6)the department shall issue a maximum of 20 percent of the drawing permits allocated to nonresidents in (2), (3), (4), and (5) of this subsection to nonresidents accompanied by a resident over 19 years of age who is the spouse or other relative of the applicant within the second degree of kindred, as described in AS 16.05.407(a).”

The Delta Controlled Use Area (DCUA) is included as number (5), which states “the department shall issue a maximum of 10 percent of the drawing permits to nonresidents and a minimum of 90 percent of the drawing permits to resident, ...”

The draw hunt supplement in previous years stated “up to 10% to nonresidents.” In the 13 years immediately preceding 2023, the average percentage of total permits awarded to all nonresidents ranged from 1.4% to a high of 8.1% with an average of 5.1%. The 2023 implementation of this regulation was technically correct but did not meet the intent of the proposal, and is definitely opposed by the Delta AC. It did not provide “up to” 10% of each hunt, but instead split the guided nonresident and second degree of kindred (2DK) nonresidents between the two hunts, with the walk-in early hunt having 1.4% of the permits set aside for 2DK nonresident hunters and the motorized late hunt having 17% of the permits set aside for guided nonresidents. This implementation guarantees a total of 10% of all permits in the DCUA to nonresidents, but significantly disadvantages residents, guided nonresidents, and 2DK nonresidents on one hunt or the other. It also means any nonresident tags not awarded during the draw, become undersubscribed and are then available for nonresidents on a first-come first-served basis.

In 2023 there were 73 applicants for the single 2DK nonresident permit, and only one qualified guided nonresident application for seven available .

The author of Proposal 149, is not familiar with the hunters or guides operating in the DCUA but included it in his proposal because it was a place with nonresident allocation limits in its sheep hunts. The rationale of Proposal 149 is based on numbers of 2DK and guided nonresidents applying for permits in areas where the author hunts and do not extend to the DCUA. His statement that “*Less than 15% of nonresident sheep hunters are second degree of kindred (2DK) hunters statewide, (hunting with a relative)...*” obviously

misses the mark for the DCUA hunts where the latest draw application cycle saw 98.7% of nonresident applications from 2DK hunters (73 of 74 total qualified applications). Further, in the 13 years from 2009-2022, the percentage of 2DK applicants from all nonresidents ranged from 29.3% to a high of 97.1% and averaged 72.8% annually.

These numbers reflect that in the same period, there were only two guides registered to operate in Units 20D/20A and one of those does not offer sheep hunts. Predictably, following the results of this year's draw and six nonresident tags being available on the first-come first-served basis, two more guides have registered in 20D/20A within weeks of the draw permit results being published. There is a small portion of the DCUA in Unit 13. Based on outfitter websites, only one of the six registered guides in Unit 13 could be guiding sheep hunters in DCUA, and it is unknown if he does.

The Delta AC is ambivalent about the split of nonresident permits between 2DK and guided hunters.

The Delta AC unanimously supports returning the application and drawing process for DCUA sheep hunts, including allocation of non-resident permits, to the way it was done prior to implementation of Proposal 149.

**PROPOSED BY:** Delta Fish and Game Advisory Committee (EG-F23-244)

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## **PROPOSAL 131**

### **5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.**

Allocate 10% of the Delta Controlled Use Area sheep drawing permits to nonresidents as follows:

10% of the total number of sheep permits issued in the Delta Controlled Use Area will be guaranteed to nonresidents and these nonresident permits will be divided evenly as possible between the two hunts in this area that occur August 10<sup>th</sup> to August 25<sup>th</sup> and August 26<sup>th</sup> to September 20<sup>th</sup>. The second degree of kindred permit can be issued in either hunt at the departments discretion if there is one issued.

**What is the issue you would like the board to address and why?** I would like to have 10% of the sheep draw permits in the Delta Controlled Use Area guaranteed to nonresidents in the draw. It is currently up to 10% but in the 2023 draw permit supplement the department gave nonresidents 10% of the total permits and I would like to see them get that permanently.

10% of the permits have been issued in the past under the current regulations and this would give guides some certainty when applying their hunters for these permits.

**PROPOSED BY:** Dan Montgomery (EG-F23-323)

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## **PROPOSAL 132**

**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.**

Allocate 20% of the resident only late season Delta Controlled Use Area sheep drawing hunt DS204 to archery only as follows:

Allocate 20% of the total DS204 tag allotment each year to a separate tag that is archery only for the same area. If managers see fit, this archery hunt could take place during the same time as the general DS204 hunt or could take place during a separate time period.

20% of the total number of DS204 tags that would currently be allotted will be re-allocated to a new drawing hunt. **1 Full Curl Ram by bow and arrow only 8/26-9/20**

**What is the issue you would like the board to address and why?** This proposal is one of several written this year with the intention of **maintaining hunting opportunity for all hunters while decreasing harvest on sheep populations.**

The current tag allotment for DS204 is adjusted each year to accommodate the estimated harvestable surplus of sheep in this area. This proposal is intended to maintain that number of tags but to allocate 20% of them each year to archery only. Because of the increased difficulty of archery hunting this will shield an overall decrease in harvest which, over time, may result in more sheep being available for harvest in future year. Similarly, in the event that sheep population does decline, wildlife managers may be able to maintain the number of tags because of the overall decrease harvest rate of tag holders (due to 20% of them being archery hunters who will have lower success rates.) Over time this could demonstrate the effectiveness of using archery as an effective management tool for sheep hunting in Alaska.

Overall, this will maintain opportunity while decreasing harvest and thereby enhancing the overall resource for future generations of hunters.

\*\*\*Of note, in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and layering to shoot a bow. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks.

**PROPOSED BY:** Paul Forward

(EG-F23-290)

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## **PROPOSAL 133**

### **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.**

Allocate 20% of the resident only early season Delta Controlled Use Area sheep drawing hunt DS203 to archery only or create a new early season archery only hunt as follows:

Allocate 20% of the total DS203 tag allotment each year to a separate tag that is archery only for the same area. If managers see fit, this archery hunt could take place during the same time as the general DS102 hunt or could take place during a separate time period.

#### **Option 1:**

20% of the total number of DS203 tags that would currently be allotted will be re-allocated to a new drawing hunt. **1 full-curl ram by bow and arrow only 8/10-8/25**

#### **Option 2:**

20% of the total number of DS203 tags that would currently be allotted will be re-allocated to a new drawing hunt. **1 full-curl ram by bow and arrow only 8/1-8/10.**

**What is the issue you would like the board to address and why?** This proposal is one of several written this year with the intention of **maintaining hunting opportunity for all hunters while decreasing harvest on sheep populations.**

The current tag allotment for DS203 is adjusted each year to accommodate the estimated harvestable surplus of sheep in this area. This proposal is intended to maintain that number of tags but to allocate 20% of them each year to archery only. Because of the increased difficulty of archery hunting this will shield an overall decrease in harvest which, over time, may result in more sheep being available for harvest in future year. Similarly, in the event that sheep population does decline, wildlife managers may be able to maintain the number of tags because of the overall decrease harvest rate of tag holders (due to 20% of them being archery hunters who will have lower success rates.) Over time this could demonstrate the effectiveness of using archery as an effective management tool for sheep hunting in Alaska.

Overall, this will maintain opportunity while decreasing harvest and thereby enhancing the overall resource for future generations of hunters.

\*\*\*Of note, in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and layering to shoot a bow. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks.

**PROPOSED BY:** Paul Forward

(EG-F23-291)

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## **PROPOSAL 134**

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

Change the time frame for which a person can be awarded Mt. Harper sheep drawing permit DS206 in Units 20E and 20D, to one permit every four regulatory years or once per lifetime as follows:

I would ask that the same one per every four years rule or a one per lifetime rule be applied to DS206 as an obvious means to increasing opportunity for those who have never drawn the hunt. I would ask this to be the minimum time allowance for any one individual to win this permit with a consideration for an even longer time period such as perhaps “one per lifetime.”

**What is the issue you would like the board to address and why?** For sheep drawing permit 206 (Mt Harper) the current regulations allow for resident individuals to apply (and potentially win) a permit every year. As we continue to see a changing environment adversely affect our sheep populations with a corresponding reduction in permit numbers, the federal government closing areas to sheep hunting, and no points system for Alaskas drawing permits it becomes increasingly difficult for Dall sheep hunters to have an opportunity to harvest a large representation of the species. The one per every four regulatory years rules already applies to areas that have historically held far larger populations of sheep such as the Tok Management Area than occur in the Mount Harper area.

**PROPOSED BY:** Donald Lee III

(EG-F23-229)

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## **PROPOSAL 135**

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

Close Mount Harper sheep drawing hunt DS206 in Units 20D and 20E, to nonresidents as follows:

I would as the board to consider permanently closing this hunt to nonresidents.

**What is the issue you would like the board to address and why?** For sheep drawing permit 206 (Mount Harper) the current regulations allow nonresident individuals to apply (and potentially win) a permit every four years. As we continue to see a changing environment adversely affect our sheep populations with a corresponding reduction in permit numbers, the federal government closing areas to sheep hunting, and no points system for Alaskas drawing permits it becomes increasingly difficult for resident Dall sheep hunters to have an opportunity to harvest a large representation of the species.

**PROPOSED BY:** Donald Lee III

(EG-F23-230)

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## **PROPOSAL 136**

### **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 bears to be taken over bait in Unit 20D south of the Tanana River, and require a registration permit as follows:

A spring grizzly bear season similar to brown bear in Kenai that is regulated via registration permits, subject to closer monitoring of harvests, and closure (if necessary) to allow hunters an opportunity to hunt grizzly bear over bait in Unit 20D. I would not want to change the fall season to continue the opportunity to harvest a bear while moose hunting without registering for a tag. I have outlined how I think this change would say if adopted by the Board of Game.

On page 26 of the 2023-2024 Hunting Regulations booklet, the bullet currently reads (the underlined portion is the affected portion):

In Units 7, 11-13, 14A, 14B, 14C Remainder, 15-16, 18, 19A, 19D, 19E, 20A, 20B, 20C, 20D north of the Tanana River, 20E, 20F, 21C, 21D, 23, 24C, 24D, 25C, and 25D brown/grizzly bears may be taken at bear bait stations. Hunters must comply with seasons, bag limits, salvage, and sealing requirements for brown/grizzly bears. (Registration permits and locking-tags may be required in some areas, contact ADF&G for details).

If my proposal is adopted, it would read (the underlined portion is the affected portion):

In Units 7, 11-13, 14A, 14B, 14C remainder, 15-16, 18, 19A, 19D, 19E, 20, 21C, 21D, 23, 24C, 24D, 25C, and 25D brown/grizzly bears may be taken at bear bait stations. Hunters must comply with seasons, bag limits, salvage, and sealing requirements for brown/grizzly bears. (Registration permits and locking-tags may be required in some areas, contact ADF&G for details).

On page 108, the regulations currently state for both resident and nonresident hunters in Unit 20D one bear may be taken every regulatory year, with an open season of August 10- June 30.

If my proposal is adopted, the regulations would read for both resident and nonresident hunters in Unit 20D, one bear may be taken every regulatory year by registration permit available online or in person, with an open season of April 15 - June 30.

With a second entry stating for both residents and nonresidents in Unit 20D, one bear may be taken every regulatory year, with an open season of August 10 - April 14.

**What is the issue you would like the board to address and why?** Unit 20D south of the Tanana River is the only area in Unit 20 that does not authorize the harvest of grizzly bears over bait. I would like to see all of Unit 20 open to the harvest of grizzly bears over bait. While a portion of 20D does have extensive developed access which could lead to a spike in hunter interest and harvest, it also may not, based on what happened in surrounding units when baiting was allowed (20A, 20B, 20C). In these units, interest and harvest spiked when the regulation was changed to allow baiting for two to three years but then that interest decreased. If this pattern does not follow suit my proposal with the registration permit allows ADF&G to quickly close the season if harvest levels go well beyond what the department determines as sustainable. According to ADF&G some bear populations (and other species) are monitored by harvest data via looking at changes in harvest rates, or a change in skull size, or age of certain animals at time of harvest when accurate population estimates are not available. ADF&G has yet to document any significant

changes to the harvest data for Unit 20D grizzly bears, but if they do see a change indicating a population decline they have the registration permit as a tool to make quick changes to the season in order to protect bears. Until ADF&G can document a definite biological concern there seems to be a lost opportunity for being able to bait Unit 20D grizzly bears.

**PROPOSED BY:** Nicholaus Solomon (EG-F23-186)

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### **PROPOSAL 137**

**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 bears to be taken over bait in all of Unit 20 as follows:

Allow the hunting of brown/grizzly bears over bait in all of Unit 20: Brown/grizzly bears MAY NOT be taken over bait or scent lures EXCEPT under conditions of a bear baiting permit in Units 7, 11-13, 14A, 14B, 14C remainder, 15-16, 18, 19A, 19D, 19E, 20, 21C, 21D, 23, 24C, 24D, 25C, and 25D.

**What is the issue you would like the board to address and why?** There is a large and healthy population of brown/grizzly bears in Unit 20 and we need to have the ability to use this resource and help our moose and caribou populations through more lenient limitations on baiting within all of Unit 20.

**PROPOSED BY:** Tyrel Palmer (EG-F23-205)

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### **PROPOSAL 138**

**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 bears to be taken over bait in Unit 20D south of the Tanana River as follows:

Amend the current regulation to allow grizzly/brown bears to be harvested at a bait station in the entirety of Unit 20D by striking the phrases “that portion of” and “north of the Tanana River”, from Section (b)(1) and (b)(13). After amendment the regulation would read “...20(A), 20(B), 20(C), 20(D), 20(E)...”, for both of the aforementioned sections.

**What is the issue you would like the board to address and why?** In the Delta Junction area, the winter of 2021-2022 had the largest snow accumulation in recorded history, per USDA-NRCS snow accumulation data. Making the event even more destructive, a mid-winter rain event put a two-inch ice layer in the middle of the snowpack. All wildlife in Unit 20D south suffered from the extremely hard winter, but especially the ungulates. According to ADF&G surveys completed and reported to the Delta Advisory Committee by local area biologists, the Delta bison and the Macomb Plateau caribou herd populations were reduced by almost 50% and the moose population by 40%.

According to ADF&G biologist out of Palmer, Alaska, in his “determining kill rates of ungulate calves” research, a mature female grizzly/brown bear consumed 44 calves in 25 days and a mature male consumed 42 calves in 26 days. This amount of predation could be extremely devastating to the remaining population of the ungulates in the unit. The biologist also produced and compiled data that states: “the cautious approach applied to grizzly/brown bear management may not be necessary” and that the population

estimates should not be based on harvest but along with other facts that support a higher harvest of grizzly/brown bears as long as the breeding females and their young are protected. This information is in the research article “Effects on Harvest of Brown Bear Population in Alaska” which also supports research completed by the Delta ADF&G office that demonstrates that these bears travel a large area and will repopulate areas with lower bear densities and even produce more cubs to do so. Unit 20D south has basically become a sanctuary for these bears as you can bait in every unit surrounding this portion of land, yet all of the surrounding areas are still supporting a healthy population of grizzly/brown bears after years of baiting. At this point, there is no biological data that shows any type of a conservation concern for the grizzly/brown bear population. There is, however, growing concern based on last years surveys, for the ungulate population after our heavy losses of sheep, caribou, bison and moose last year, which demonstrates that this area should be opened to harvesting grizzly bears over bait stations. This would also simplify the regulation to create continuity throughout the unit. It may also be prudent to be proactive in this matter and eliminate this lost opportunity for harvest, rather than having to depend on the department to conduct predator control later on which is a costly endeavor.

**PROPOSED BY:** Delta Fish and Game Advisory Committee

(EG-F23-243)

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## **Galena Area - Units 21B, 21C, 21D & 24**

*Note: This proposal is also scheduled for the January 26-29, 2024 Western Arctic / Western Region meeting in Kotzebue, Alaska as Proposal 2, during which Units 22, 23 and 26A will be considered. The board may defer final action on all Units to the Interior and Eastern Arctic Region meeting.*

### **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 as follows:

**RESIDENT HUNTERS: Four caribou [FIVE CARIBOU PER DAY] per year, however, no more than 1 cow may be taken.**

**What is the issue you would like the board to address and why?** Data from biologists at the ADF&G illustrate that there has been continued decline in the Western Arctic caribou herd (WACH). The July 2022 photo census estimated 164,000 caribou in the Western Arctic caribou herd which is down from 188,000 in 2021. Census numbers for past years: 2020 – no census; 2019 – 244,000; 2018 – no census; 2017 – 259,000; 2016 – 201,000. In the two years between the 2019 and 2021 census, the herd declined nearly 12% per year. Additionally, data shows that the cow survival rate is at 71% in 2021, well below the herd's average of 81% (1981-2020). ADF&G presented this information to the WACH Working Group in December 2022.

At its annual meeting the WACH Working Group assigned the management level “Preservative, Declining” to the herd based on the current census (within the range of 130,000-200,000) and adult cow survival rate less than 80%.

In doing so, the WACH Working Group sees the immediate need to address the current herd decline by limiting the harvest of both bulls and cows to allow the herd population to begin to recover.

In the units identified above, the current bag limit is set at five caribou per person per day during the open periods for bulls and cows. The WACH WG proposes to change regulations to four caribou per person per year, with no more than one cow allowed.

**PROPOSED BY:** Western Arctic Caribou Herd Working Group, Vern Cleveland, Chair (EG-F23-208)

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*Note: This proposal is also scheduled for the January 26-29, 2024 Western Arctic / Western Region meeting in Kotzebue, Alaska as Proposal 3, during which Units 22, 23, and 26A will be considered. The board may defer final action on all Units to the Interior and Eastern Arctic Region meeting.*

### **PROPOSAL 140**

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

Close nonresident caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A as follows:

The Western Arctic caribou herd (WACH) Working Group proposes to close caribou hunting in units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A to non-Alaska residents.

NONRESIDENT HUNTERS: **No open season** [1 BULL].

**What is the issue you would like the board to address and why?** Data from biologists at the ADF&G illustrate that there has been continued decline in the Western Arctic caribou herd (WACH). The July 2022 photo census estimated 164,000 caribou in the Western Arctic caribou herd which is down from 188,000 in 2021. Census numbers for past years: 2020 – no census; 2019 – 244,000; 2018 – no census; 2017 – 259,000; 2016 – 201,000. In the two years between the 2019 and 2021 census, the herd declined nearly 12% per year. Additionally, data shows that the cow survival rate is at 71% in 2021, well below the herd’s average of 81% (1981-2020). ADF&G presented this information to the WACH Working Group in December 2022.

At its annual meeting the WACH Working Group assigned the management level “Preservative, Declining” to the herd based on the current census (within the range of 130,000-200,000) and adult cow survival rate less than 80%. In doing so, the WACH Working Group sees the immediate need to address the current herd decline by limiting caribou harvest to allow the herd population to begin to recover.

In a separate proposal, the WACH Working Group proposes a reduction in harvest for resident hunters. The working group feels that if harvest reductions are placed on Alaskans to allow the herd to recover, there should also be harvest reductions for nonresident hunters.

Currently, in the units identified above, non-Alaska resident hunters are allowed to harvest one (1) bull per year. The WACH Working Group proposes to close caribou hunting in units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A to non-Alaska residents.

**PROPOSED BY:** Western Arctic Caribou Herd Working Group, Vern Cleveland, Chair (EG-F23-209)  
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## **PROPOSAL 141**

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

Close the youth sheep hunts in Units 24A and 25A as follows:

Eliminate the youth hunts in Units 24A and 25A which fall outside the regular season therefore allowing sheep to be spotted from the air.

**What is the issue you would like the board to address and why?** I would like the board to address the issue of the declining Dall sheep population in Units 24A and 25A.

**PROPOSED BY:** Tim Nelson (EG-F23-223)  
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## **PROPOSAL 142**

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

Change sheep hunting in portions of Units 24A and 25A to archery only as follows:

In Units 24A and 25A, in the vicinity of the Dalton Highway Corridor Management Area (DHCMA), on the east side of the road, all sheep hunting is by bow and arrow only within 15 miles of the Dalton Highway for one ram, full-curl or larger.

Or, put another way:

In Units 24A and 25A, all areas within 15 miles of the Dalton Highway is open to sheep hunting by bow and arrow only for one ram, full curl or larger.

Upon manager discretion, the season could either revert back to the previous 8/10-9/20 or update to the new 8/10-10/5 for the DHCMA.

All other existing regulations for this area would remain unchanged by this proposal.

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

**The purpose of this proposal is maintain hunting opportunity along the Dalton Highway while significantly decreasing the harvest in an area with recent sheep population concerns that resulted in a temporary emergency closure.**

In July of 2022 the Federal Subsistence Board approved WSA22-02 which put a two-year closure for sheep hunting in part of the Dalton Highway Corridor Management Area (DHCMA). The explanation given was that “although sheep numbers across the entire Brooks Range may be generally stable, declines in sheep populations along the DHCMA are a substantial concern for rural Alaska subsistence users. These subsistence users depend on efficiency of harvest, close to where they live, regarding the local sheep population. The local rural Alaska residents are especially concerned with the population status of sheep within the DHCMA.” Furthermore, as in some other areas of Alaska, biologists have begun to question (and potentially study) whether full-curl management (FCM) is an adequate strategy to conserve sheep populations, especially those within relatively easy reach from places like the Dalton Highway.

Those who have spent extensive time hunting in the DHCMA are aware that within the relatively narrow five mile corridor there are only few isolated areas that hold sheep and there are even fewer areas in which bands of rams typically reside. The success rate of archery hunters for sheep in this portion of the DHCMA is close to zero sheep per year by bow for much of the past decade. Groups of sheep that live near the five mile boundary are often hunted by those using rifles who have easy access given the narrow band of bowhunting terrain separating them from the highway. Because archery hunters kill less than one sheep per year in the DHCMA, if there is decline in the area related to hunting, it is very likely due to that fact that the Dalton Highway allows easy access to the sheep who live just five miles off the road to the much more efficient use of rifles for sheep hunting.

One solution to this issue that would **maintain opportunity while essentially cutting the non-subsistence harvest to almost zero**, would be to expand the archery only corridor in Units 24 and 25A for Dall sheep to 15 miles. This would provide a large enough area of respite from rifle use that rams of all ages would have much higher survival rates. This would also decrease the amount of airplane hunters

using planes to find (during preseason scouting or illegally during the season) and harvest sheep close to the road where subsistence users also rely on them. Creating an enlarged archery only area would have **zero negative impact in overall hunting opportunity** because anyone who wants to hunt via general season harvest tag would still be able to. They would just have to accept a little more challenge by taking a bow instead of a rifle. Skilled and/or lucky hunters would still occasionally kill a ram but the harvest within 15 miles of the road would be greatly decreased as would the impact on local subsistence users.

**If this were to be passed a proposal would then be submitted by this author to the Federal Subsistence Board asking to rescind the closure due to the change in regulation. With the prospect of essentially zero rams being killed within 15 miles of the highway by non-subsistence users, this may prove a tenable option.**

On Precedent:

There is precedent in Alaska demonstrating that archery only sheep hunting has a very low impact on sheep populations while providing excellent opportunity for hunters. In the two existing archery draw hunts in Alaska, DS140 and DS 141, which are easily accessible by road system near anchorage and have an established ATV trail within a couple of miles of much of the hunting area, there are still abundant sheep and mature rams in the area. Of the 64 resident hunters who receive that tag each year, on average one to three sheep have been killed in total in recent years and those are *any ram hunts*. This precedent demonstrates that archery hunts provide great opportunity for hunters but have little to no affect on animal populations. Based on this precedent in Unit 14C, we can expect that the proposed hunt in Units 24 and 25 hunt would have essentially zero adverse effect on sheep populations while increasing hunter opportunity.

On Opportunity:

In the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and layering to shoot a bow. Currently, it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks.

\*\*\*Limiting the expansion of the corridor like this in just Units 24A and 25A for sheep hunting would not create any issues for other rifle hunting opportunities outside of the five mile corridor.

**PROPOSED BY:** Paul Forward

(EG-F23-325)

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## **PROPOSAL 143**

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

Eliminate the extended season archery sheep hunts within the Dalton Highway Corridor Management Area as follows:

Eliminate the extended archery season in Units 24 and 25 within the Dalton Highway Corridor Management Area (DHCMA.)

This hunt falls outside of the regular season which means that sheep can be spotted from the air during this hunt giving guides with airplanes an unfair advantage.

**What is the issue you would like the board to address and why?** The issue that I would like the board to address is the decline of the Dall sheep population in Units 24 and 25.

**PROPOSED BY:** Tim Nelson

(EG-F23-252)

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## **PROPOSAL 144**

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

Allow nonresident sheep hunting by drawing permit only in portions of Units 24A and 26B and reduce the season as follows:

Limit nonresident sheep hunters in Units 24A and 26B west of the Sagavanirktok River to draw-only hunts with a limited allocation and shorten the season.

**Unit 24A within the Dalton Highway Corridor Management Area, Unit 24A Remainder, and Unit 26B west of the Sagavanirktok River:**

#### **Nonresidents**

**One ram with full curl horn or larger  
by drawing permit only, every four  
regulatory years; up to 10 permits  
may be issued**

**Aug 10 – Sept 20** [AUG 10 – OCT 5]

[ONE RAM WITH FULL CURL HORN OR LARGER  
EVERY FOUR REGULATORY YEARS]

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

**Unlimited nonresident sheep hunting opportunity, federal sheep hunting closure**

Just prior to the 2022 sheep hunting season, the Federal Subsistence Board (FSB) closed all sheep hunting on federal lands in Unit 24A and 26B west of the Sagavanirktok River for two years based on conservation concerns for the sheep population.

This temporary closure will be reviewed in two years at which time the FSB will determine whether to open sheep hunting opportunity again for both federally qualified subsistence users (FQU) and non-federally-qualified users (NFQU).

Much of this closure area is within the Dalton Highway Corridor Management Area (DHCMA) where bowhunters are able to access sheep country from the road and is very popular with resident sheep hunters.

Guides have taken advantage of no limits on nonresident sheep hunters in these areas by booking more hunts for nonresident sheep hunters who want to attempt to harvest a Dall sheep ram with a bow. Nonresident sheep hunters are now harvesting a bit over 40% of the rams in these units, and that impact was part of why the FSB shut down sheep hunting.

Nonresident sheep hunters need to be limited across the state to draw-only hunts with a limited allocation and that especially needs to happen in these units. Limiting nonresident sheep hunters now sends a message to the FSB that the Board of Game is willing to take action on reducing overall harvests on declining sheep populations by non-Alaskans and will go a long way in encouraging the FSB to again open these lands to sheep hunting by both FQU and NFQU. If nothing is done to limit nonresident sheep hunters, it is doubtful the FSB will open sheep hunting at all in the near future to NFQU.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F23-016)  
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## **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 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
...		
(19)		
...		

(B) on or after July 1, 2018, the hunting seasons and bag limits for moose in Unit 21 are as follows:

...

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

RESIDENT HUNTERS:

...

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

(Winter season to be  
announced)

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. Our goal is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose recently emerged because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost, and our ability to meet Intensive Management (IM) harvest objectives could be reduced. In addition, rather than allow the population to go through dramatic rates of expansion and contraction, we believe it is necessary to slow the rate of increase.

The IM harvest objective for Unit 21D is 450–1,000 moose. The ten-year average estimated harvest during 2012–2021 was 401 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not met the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make progress toward achieving the IM harvest objectives without reducing bull:cow ratios to low levels. Subsistence hunters will benefit from the opportunity to harvest cow moose.

Analysis of three Trend Count Areas (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough TCAs) within the Kaiyuh Flats demonstrated an increase in moose abundance among all age classes from 2001 to present. Geospatial Population Estimate data also increased from 1,897 ( $\pm 11\%$ ) moose in 2011 to 4,116 ( $\pm 10\%$ ) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates 2004–2022 (avg. = 35.7%), although the five-year twinning rate average (2018–2022) was 25.4%.

The portion of Unit 21D affected by this reauthorization is approximately 21% (2,559 mi<sup>2</sup>) of Unit 21D (12,093.6 mi<sup>2</sup>). Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the total moose estimated in Unit 21D at 10,478 moose ( $\pm 1,572$ ) in 2021. The mid-point for the total Unit 21D moose population estimate was above the IM population objective for all of Unit 21D (12,093.6 mi<sup>2</sup>) of 9,000–10,000 moose.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-048)

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## **PROPOSAL 146**

### **5 AAC 92.124. Intensive Management Plans VIII.**

Adopt an Intensive Management Program and implement wolf control on all state lands in Units 24A and 25A as follows:

Adopt and implement a wolf Intensive Management program on all state lands in Unit 24A and 25A.

**What is the issue you would like the board to address and why?** In the last three years we have noticed a substantial increase in predation on moose in Unit 24A and 25A. I believe this to be caused by two main factors. The first being the crash of the snowshoe hares in 2019, and the second being the Porcupine Caribou Herd wintering in the area. Each fall when the caribou migrate in we see new packs of wolves following the caribou. These are in addition to the local wolf packs that are there year round. In the last few years it has not been uncommon to see wolves on a daily basis while in the field moose and sheep hunting in the fall. I believe that a wolf Intensive Management predator control program implemented on all state lands in Units 24A and 25A would help to maintain moose, and caribou populations as well as benefit other ungulates in the area.

**PROPOSED BY:** Jonah Stewart

(EG-F23-199)

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## **PROPOSAL 147**

### **5 AAC 92.124. Intensive Management Plans VIII.**

Allow hunters to take wolves in Units 24 and 25 the same day they have been airborne as follows:

Same Day Airborne Exceptions:

You may hunt wolf in unit Units 24 & and 25 the same day you have flown, provided you are at least 300 feet from the airplane.

**What is the issue you would like the board to address and why?** We have seen increased predation on moose and sheep within this area since the crash of the snowshoe hair population a few years ago. It is not uncommon to see wolves chasing sheep and moose during the fall on a regular basis. Changes in regulation to liberalize harvest methods will allow for more incidental harvest on wolves and help increase ungulate populations.

**PROPOSED BY:** Jonah Stewart

(EG-F23-182)

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## **PROPOSAL 148**

### **5 AAC 92.124. Intensive Management Plans VIII.**

Create a predator control program for wolves in Units 24A and 25A as follows:

Creation of a predator control program with the intention of harvesting wolves on state lands in Units 24A and 25A. Aerial predator control in these areas from fixed wing aircraft would be highly effective.

**What is the issue you would like the board to address and why?** Over the past three years we have observed an increase in the wolf population and an associated increase in predation on moose resulting in a drop in the overall moose population in the area. The Porcupine Caribou Herd has had an increased presence in these areas in the early fall through late spring, bringing with them more wolf packs. A predator control program aimed at harvesting wolves on state lands in Units 24A and 25A would greatly benefit moose and sheep populations in these areas.

**PROPOSED BY:** Luke Tyrrell

(EG-F23-270)

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## **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 as follows:

Wolf trapping season Units 19D, 21A, 24, and 25..... Oct. 1 - April 30.....No Limit

**What is the issue you would like the board to address and why?** In recent years the Porcupine caribou herd has wintered in Unit 24A and 25A near the Dalton Highway. This has brought in more wolves than we have seen in a long time. I believe it would be helpful to align the wolf trapping season in all of Units 24 and 25 with the current trapping season dates in Unit 25D of October 1-April 30.

**PROPOSED BY:** Jonah Stewart

(EG-F23-256)

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## **PROPOSAL 150**

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

Lengthen the wolf hunting season in Units 24 and 25 as follows:

Change wolf season to August 1-June 15 for residents and nonresidents in Units 24 and 25. This will allow for incidental wolf harvest during spring bear hunting, benefiting prey species in the area.

**What is the issue you would like the board to address and why?** Over the past three years we have observed an increase in the wolf population and an associated increase in predation on moose resulting in a drop in the overall moose population in the area. The Porcupine Caribou Herd has had an increased presence in these areas in the early fall through late spring, bringing with them more wolf packs. Liberalizing the wolf season to allow harvest during spring bear hunting would increase the harvest of wolves in these areas.

**PROPOSED BY:** Luke Tyrrell

(EG-F23-269)

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## **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 as follows:

Wolf - Unit 24 Ten wolves August 1 - June 30

Wolf - Unit 25 Ten wolves August 1 - June 30

**What is the issue you would like the board to address and why?** Predation on moose and sheep have been high in recent years since the crash of the snowshoe hare population. Lengthening the wolf season in the spring will result in more incidental wolf harvest during spring bear hunts and help recovery of ungulate populations.

**PROPOSED BY:** Jonah Stewart

(EG-F23-183)

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## **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 as follows:

Establish a resident two bear bag limit for residents (5AAC 85.020) in Units 24C and 24D.

Establish a fall bear baiting season (5AAC 92.044) in Unit 21B and 24B.

**What is the issue you would like the board to address and why?** This proposal seeks to increase the harvest opportunity from one brown bear per regulatory year to a two brown bear bag limit for residents in Units 24C and 24D and allow harvest of brown and black bears from August 1 –September 30 at registered bear bait stations in Units 21B and 24B. Resident hunters that take brown bears are low in number and should be afforded additional harvest opportunity with a two brown bear limit. Units 21 and 24B already has a two brown bear limit for residents and this would align bag limits with nearby Units.

Adding fall bear baiting in Units 21B and 24B would align brown bear baiting with surrounding units. The Board of Game first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014 spring bear baiting in Unit 21C in 2017 and spring bear baiting in 2020.

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

**PROPOSED BY:** Koyukuk River Fish and Game Advisory Committee

(HQ-F23-069)

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**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 as follows:

Wolverine hunting and trapping season ends April 30th.

**What is the issue you would like the board to address and why?** Extend wolverine hunting and trapping seasons to include through April. Wolverine have always been harvested during April by rural hunters and trappers when traditional beaver trapping season. Many wolverine are harvested for traditional potlatch. It is against our cultural beliefs to not accept what we believe has been provided. Most rural residents are not even aware the season is closed in April.

**PROPOSED BY:** Gilbert Huntington

(EG-F23-248)

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## **Northeast Alaska – Units 25A, 25B, 25D, 26B & 26C**

### **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 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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Remainder of Unit 26(B)

RESIDENT HUNTERS:

<b><u>5 caribou</u></b> [4 BULLS]	July 1–Apr. 30
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NONRESIDENT HUNTERS:

<b><u>2 bulls</u></b> [1 BULL]	Aug. 1–Sept. 15
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**What is the issue you would like the board to address and why?** The Central Arctic caribou herd (CAH) grew throughout the early 2000s from an estimated 29,5019 (95% C.I. = 26,504–32,533) in 2000 to a high of 68,442 (95% C.I. = 54,571–82,312) in 2010 then declined precipitously by 2016 to 22,630 (95% C.I. = 20,074–25,186). Since 2016 the herd has slowly grown to an estimated population size of 34,642 (95% C.I. = 32,419–36,866). The management objective for CAH is 28,000–32,000 caribou and the current estimate is above the objective. In the past, harvest has shown to have little effect on this population but harvesting a few cows could help slow the growth of this herd. Regardless of the herd growth concerns, there is currently a harvestable surplus of cow caribou available. This proposed regulation change would allow the opportunity to harvest those surplus animals and provide some ability to slow the growth of this herd. Allowing the small number of nonresidents that harvest caribou in this area to take an additional bull would have negligible impact on the herd and would align the nonresident bag limit with Units 26C, 25A, 25B, and 25D.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-051)

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## **PROPOSAL 155**

### **5 AAC 85.025 Hunting seasons and bag limit for caribou.**

Increase resident caribou hunting opportunity in Unit 26B Remainder as follows:

Residents **5 caribou** [4 BULLS] July 1 – April 30

No change to nonresident season or bag limit.

**What is the issue you would like the board to address and why?** The Central Arctic caribou herd (CAH) is an identified big game prey population under our Intensive Management (IM) Law important for high levels of human harvest by Alaskans. It has an IM population objective of 28,000 – 32,000 animals.

In 2010, the CAH population was wildly over the population objective at 68,000 animals and hunting was basically unlimited. The CAH then crashed to 22,000 animals in 2016, which led to the Board of Game at their 2017 Region III meeting significantly reducing hunting opportunity for both residents and nonresidents. However, the new bag limits the board levied on residents were much more restrictive than those on nonresidents, and subsequently nonresident CAH hunters began to take the majority of the harvest.

The CAH population began to slowly increase, and the board later increased the resident bag limit to four bulls to give residents more opportunity to put meat in their freezers, leaving the nonresident season and bag limit of one bull the same.

Currently, the CAH population is just over the Intensive Management (IM) population objective at 32,416 animals based on the 2022 photo census estimate, and there is a harvestable surplus of animals. Resident hunting opportunities –especially the opportunity to take cows – can now be expanded back to where they were in the past for this Intensive Management population.

The Department of Fish and Game believes that with the current population and trajectory of the CAH, we can sustainably harvest 350-400 cows annually. When hunting was unlimited, the highest cow harvest seen was 346 in 2011. While we don't believe we need a cow quota based on this information, the board may want to consider giving the department the ability to reduce cow harvests if necessary, as the herd is monitored.

We do not support any increase in the nonresident season or bag limit, or any amendments to this proposal that would increase the nonresident season or bag limit. Information, the board may want to consider giving the department the ability to reduce cow harvests if necessary, as the herd is monitored.

**We do not support any increase in the nonresident season or bag limit, or any amendments to this proposal that would increase the nonresident season or bag limit.**

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F23-012)

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## **PROPOSAL 156**

### **5 AAC 85.025. Hunting seasons and bag limit for caribou.**

Change the nonresident caribou hunt in Unit 26B Remainder to a drawing hunt or registration hunt with a limited number of permits available as follows:

Change the nonresident caribou hunt in Unit 26B Remainder to draw only or registration with a limit to the amount of tags given out.

**What is the issue you would like the board to address and why?** While caribou hunting the Dalton Highway in Unit 26B the past few years, there has been a huge increase in the amount of hunters (primarily nonresident) being transported via airboat on the Sag and Echooka Rivers. It has gotten to the point where there is a camp placed every mile or so in some areas over vast stretches of river. While I have never used these services, I have routinely hiked out past the five mile corridor and have noticed the massive amount of boat and hunter traffic. I do believe that this sort of access to this area is having a negative impact on the caribou herd and the amazing remoteness of this area. While I believe that nonresident hunters should have an opportunity to hunt this area, I do believe that there should be a limit on the amount. If this is left unchecked, I am afraid this will lead to another ruined wilderness area and a dwindling caribou herd. While I understand limiting the amount of transporters transporting hunters will be difficult, I believe that limiting the amount of hunters in the area would help immensely.

**PROPOSED BY:** Kenneth Bowman

(EG-F23-188)

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*Note: This proposal is also scheduled for the January 26-29, 2024 Western Arctic / Western Region meeting in Kotzebue, Alaska as Proposal 35 during which Unit 26A will be considered. The board may defer final action on Unit 26A to the Interior and Eastern Arctic Region meeting.*

## **PROPOSAL 157**

### **5 AAC 85.050. Hunting seasons and bag limits for muskoxen.**

Change the Unit 26A and Unit 26B muskox hunt area boundaries to match federal hunt boundaries, and expand the state hunt areas as follows:

Unit 26A, that portion west of the eastern shore of Admiralty Bay where the Alaktak River drains, following the Alaktak River to 155°00' W longitude south to the Units 26A border- 1 muskox by Tier II permit Aug. 1-Mar. 15. Unit 26A East and 26B West, that portion from West of the Dalton Highway to 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 Tier II permit Aug. 1-Mar. 15.

**What is the issue you would like the board to address and why?** Modify the boundary of the western Unit 26A and eastern Unit 26A-26B muskox hunts so the boundaries match the federal hunt boundaries and so the state hunt boundaries abut.

**PROPOSED BY:** North Slope Fish and Game Advisory Committee

(EG-F23-193)

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## **PROPOSAL 158**

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

Allow nonresident sheep hunting by drawing permit only in portions of Units 25A, 26B, and 26C as follows:

Limit nonresident sheep hunters within the Arctic National Wildlife Refuge:

#### **Units 25a, 26B, and 26C within the Arctic National Wildlife Refuge Guide Concession Areas 1 -16**

##### **Nonresident Hunters**

**One ram with full curl horn or larger  
by drawing permit only, every four  
regulatory years; up to 7 permits may  
be issued** [ONE RAM WITH FULL CURL HORN  
OR LARGER EVERY FOUR REGULATORY YEARS]

Aug 10 – Sept 20

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

**Federal management of sheep within the Arctic National Wildlife Refuge, allowing feds to manage a state resource.**

Recent sheep declines are a growing concern for federal land managers. Within the Arctic National Wildlife Refuge (ANWR), all guides have exclusive concession areas, and the number of sheep hunting clients and sheep those clients can harvest is determined by the approved federal guide concession prospectus application submitted by the guide.

For example, if a guide has a concession within ANWR and he or she is approved to run seven sheep clients and harvest a maximum of seven sheep annually, that agreement is within the contract that runs for ten years. The refuge manager has no means to change that contract and lower that allocation when sheep are in decline and there are conservation concerns. All the refuge manager can do is recommend to the guides with concessions and 10-year contracts to voluntarily take less sheep. And while some guides do voluntarily take fewer sheep hunting clients and fewer sheep, some do not.

This essentially leaves sheep conservation decisions in the hands of guides who charge upwards of \$25,000 for a guided sheep hunt.

#### **State Management of our Wildlife Resources**

For a long time now, the Board of Game and the department have rightly been decrying “federal overreach” of our state game management and have pushed for state management of our wildlife resources on federal lands. But the Board of Game and the department are entirely hypocritical when it comes to allowing the feds to manage our sheep on federal refuge and National Park Service lands. The board and department are perfectly willing to have the feds manage our sheep within ANWR.

As sheep populations decline, the board needs to take control of sheep management on National Park Service and refuge lands and set allocations for nonresident sheep hunters. If the feds believe that current

allowable allocations of sheep to guides with exclusive concession contracts under the federal system are too high, yet have no way of lowering those allocations, it is a problem that the state needs to address.

There are sixteen exclusive guide concession areas within ANWR. The wildlife resources in each of those areas belong to the state and should be managed by the state! The Board of Game needs to take control of sheep management within ANWR and stop allowing the feds to manage our declining sheep resource.

There should be no opposition by guides to draw permits within exclusive concession areas, as each guide with an exclusive concession is guaranteed the clients who draw for that area. It is our understanding that most of the current federally approved sheep allocations to guides within ANWR are six to seven sheep. We suggest “up to” language as high as those current allocations, that would allow the department to manage sheep allocations within ANWR as they best see fit, so when sheep are in decline, allocations to nonresidents can be adjusted under state management regulations.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F23-017)

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### **PROPOSAL 159**

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

**5 AAC 92.530(31). Management areas.**

Open a resident only archery only hunt for sheep in the Eastern Brooks Range Management Area with aircraft restrictions, and modify the existing youth hunt in the same area as follows:

#### **Eastern Brooks Range Management Area:**

Resident One ram with full-curl horn or larger **by bow and arrow only**. August 10-September 20. **No hunter may access or exit the hunt by landing aircraft inside the EMBRMA/AVSMA except for the Arctic Village airstrip itself.**

#### **AND:**

\*\*\* Amend the existing (in regulation only due to federal closure) **Youth Hunt** to include: **No hunter may access or exit the hunt by landing aircraft inside the EMBRAM/AVSMA except for the Arctic Village airstrip itself.**

(This hunt could also be created as a registration hunt if desired by wildlife managers to closer monitor and control the harvest.)

**What is the issue you would like the board to address and why?** The purpose of this hunt is to **increase hunter opportunity while having a minimal effect on the sheep population and on local subsistence hunters** by creating a new archery only hunt in the Arctic Village Sheep Management Area/Eastern Brooks Range Management Area.

Per the ADF&G regulations, the Eastern Brooks Range Management Area (EBRMA) currently has a youth sheep hunt from August 1-5 and then a registration hunt that takes place starting in October. However, the EBRMA directly overlays the Arctic Village Sheep Management Area (AVSMA) **which is currently under federal closure** except for the late season/winter registration hunt. **The aim of this proposal is to create a state supported hunt that might prove more acceptable to AVSMA managers** because the increased difficulty of a foot accessed, archery only hunt will make the hunt



challenging enough that, despite the added hunter opportunity, will result in which very few sheep will be killed and local subsistence hunting activities and communities will not be affected.

On archery hunting:

Archery hunting is an ideal management tool in areas sensitive to harvest numbers and/or in areas being managed to create the least disturbance possible on local subsistence hunting communities. Archery hunting increases or maintains hunting opportunity for all hunters (any sheep hunter can purchase and learn to shoot a bow) while dramatically decreasing the harvest/impact compared to a hunt in which rifles are allowed. Alaska should begin to implement archery hunting for sheep as a management tool and this hunt, if it were ever to become available, would be an ideal place to utilize this strategy.

(For reference: in the two existing archery draw hunts in Alaska, DS140 and DS141, which are easily accessible by road system near anchorage and have an established ATV trail within a couple of miles of much of the hunting area, there are still abundant sheep and mature rams in the area. Of the 64 resident hunters who receive that tag each year, on average one to three sheep have been killed in total in recent years and this is an any ram hunt. This demonstrates that archery hunts provide great opportunity for hunt but have little to no affect on animal populations. This hunt would have essentially zero adverse affect on sheep populations while increasing hunter opportunity.)

On access restrictions:

To decrease interruption to local subsistence hunters, an added feature of this hunt could be that it may only be accessed by foot from outside the EBRMA/AVSMA or from Arctic Village itself. To clarify, hunters would have to enter the EBRMMA/AVSMA by foot only unless walking from Arctic Village itself. Air access would only be allowed if planes drop hunters outside of the EBRMA/AVSMA. This would create a unique “controlled access” style hunt that would drastically minimize interruption to the local community and their subsistence hunting activities.

It is the intent of this proposal that the existing youth hunt, if allowed, (which has never been an actual available hunt due to federal regulations described above) would also transition to these air access restrictions, again with the intent of minimizing any interruption to the local community.

**PROPOSED BY:** Paul Forward

(EG-F23-279)

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## **PROPOSAL 160**

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

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only as follows:

That area, identified on ANWR land status maps as GUA/ARC-6 (main Branch of the Marsh Fork the Canning)

**Resident: HT: One ram full curl or larger, by bow and arrow only.**

**Nonresident: HT: One ram full curl or larger every four years by bow and arrow only.**

**What is the issue you would like the board to address and why?** We need to adopt archery only sheep hunting areas as a conservation management tool that will maintain hunting opportunity for all but will decrease harvest. This proposal, similar to several others here is proposing a region wide transition to archery only for sheep hunting in the interest of preserving hunting opportunity in the face of sheep population decline.

Throughout the state sheep populations are generally in decline. This has been the topic of constant discussion at the state and federal level of wildlife managers and has led to a recent closure in the federal lands west of the Sagavanirktok River. Further south, in Unit 19C, this decline has resulted in an emergency closure to nonresidents at the most recent Board of Game (BOG) meeting. Sheep are in decline and concern has been raised by biologists throughout the state that full-curl management (FCM) may not be sufficient. Closures and transition to draw hunts have been the primary tools utilized by ADF&G but this proposal encourages the BOG to consider using archery hunts as a conservation management tool. Both with sheep in Alaska (DS 140/141, 240/241) and many other species in the state and around North America, archery areas and/or seasons have consistently shown that management by archery creates the ideal situation of maintaining opportunity while decreasing harvest. It is a perfect solution that benefits the game population while having very little negative affect on hunters. It simply makes the hunting a little more difficult. Skilled and/or lucky hunters will still harvest rams but the overall take will be much smaller.

Aside from a very narrow portion of the Brooks Range within the Dalton Highway Corridor, Alaska does not have any areas or seasons for for sheep. In contrast, we have at least limited seasons and a few set aside areas for hunting almost every other big game species in the state. Similarly, in British Columbia and Alberta there are designated archery areas or seasons available to all hunters. Because of the nature of archery hunting and the time and stealth often required, it is less compatible with having rifle hunters in the area, especially when some rifle hunters are shooting at 500+ yards.

For well over a decade hundreds of bowhunters have stepped forward, representing potentially thousands more hunters, resident and nonresident, requesting archery sheep seasons but thus far the BOG and ADF&G have not been willing to provide opportunity. This proposal, of taking a specific area and transitioning it to archery only for sheep will maintain opportunity for all hunters (they need only take bow instead of a rifle) but will answer the decades of request for such an area.

Despite biologists consistently telling us that sheep numbers, overall are in decline in much of the Brooks Range (and elsewhere in the state), the harvest numbers from the nonresident hunters in ANWR have shown no significant decrease. I will enclose numbers in supporting documentation but, for example, harvest statistics since 2012 show that guided hunters in ANWR had their highest harvest number ever in

2020, with the third highest being 2021. With use of extensive aerial scouting hunters in these areas year after year, have success rates above 80%. Based on ADF&G statistics resident hunters using airplanes in those same areas are also reporting success rates above 60-70% despite official and anecdotal reports that overall sheep are much more sparse than they've been in decades.

For all of these reasons, we need to start thinking about way to maintain opportunity but decrease harvest. One of these ways is to make the hunting a little bit harder through the transition to archery only hunting. Archery only sheep hunts are the perfect solution. Anyone can buy and fairly quickly learn to use a bow and everyone who wants to hunt sheep will still have the same opportunity to be out there hunting and enjoying the pursuit of these amazing animals in amazing places. The hunting will just be a little more difficult and, resulting in fewer animals being killed every year.

In this proposal we have identified one specific area within ANWR because it was identified by the ANWR management office as being up for outfitter allotment renewal soon. This criteria was utilized in an effort to avoid disrupting an existing outfitter allotment that may not be renewed for several years. If the BOG or DOI/ANWR would suggest another GUA/ARC or area,

**PROPOSED BY:** Paul Forward

(EG-F23-294)

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## **PROPOSAL 161**

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

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only as follows:

That area, identified on ANWR land status maps as GUA/ARC-04

**Resident: HT: One ram full curl or larger, by bow and arrow only.**

**Nonresident: HT: One ram full curl or larger every four years by bow and arrow only.**

**What is the issue you would like the board to address and why?** We need to adopt archery only sheep hunting areas as a conservation management tool that will maintain hunting opportunity for all but will decrease harvest. This proposal, similar to several others here is proposing a region wide transition to archery only for sheep hunting in the interest of preserving hunting opportunity in the face of sheep population decline.

Throughout the state sheep populations are generally in decline. This has been the topic of constant discussion at the state and federal level of wildlife managers and has led to a recent closure in the federal lands west of the Sagavanirktok River. Further south, in Unit 19C, this decline has resulted in an emergency closure to nonresidents at the most recent Board of Game (BOG) meeting. Sheep are in decline and concern has been raised by biologists throughout the state that full-curl management (FCM) may not be sufficient. Closures and transition to draw hunts have been the primary tools utilized by ADF&G but this proposal encourages the BOG to consider using archery hunts as a conservation management tool. Both with sheep in Alaska (DS 140/141, 240/241) and many other species in the state and around North America, archery areas and/or seasons have consistently shown that management by archery creates the ideal situation of maintaining opportunity while decreasing harvest. It is a perfect solution that benefits the game population while having very little negative affect on hunters. It simply makes the hunting a little more difficult. Skilled and/or lucky hunters will still harvest rams but the overall take will be much smaller.

Aside from a very narrow portion of the Brooks Range within the Dalton Highway Corridor, Alaska does not have any areas or seasons for sheep. In contrast, we have at least limited seasons and a few set aside areas for hunting almost every other big game species in the state. Similarly, in British Columbia and Alberta there are designated archery areas or seasons available to all hunters. Because of the nature of archery hunting and the time and stealth often required, it is less compatible with having rifle hunters in the area, especially when some rifle hunters are shooting at 500+ yards.

For well over a decade hundreds of bowhunters have stepped forward, representing potentially thousands more hunters, resident and non-resident, requesting archery sheep seasons but thus far the BOG and ADF&G have not been willing to provide opportunity. This proposal, of taking a specific area and transitioning it to archery-only for sheep will maintain opportunity for all hunters (they need only take bow instead of a rifle) but will answer the decades of request for such an area.

Despite biologists consistently telling us that sheep numbers, overall are in decline in much of the Brooks Range (and elsewhere in the state), the harvest numbers from the nonresident hunters in ANWR have shown no significant decrease. I will enclose numbers in supporting documentation but, for example, harvest statistics since 2012 show that guided hunters in ANWR had their highest harvest number ever in 2020, with the 3rd highest being 2021. With use of extensive aerial scouting hunters in these areas year after year, have success rates above 80%. Similarly, based on ADF&G statistics resident hunters using airplanes in those same areas are also reporting success rates above 60-70% despite official and anecdotal reports that overall sheep are much more sparse than they've been in decades. It would be reasonable to conclude that the nature of this terrain and the ability to easily scout large areas by plane pre-season (and very difficult enforcement of in-season scouting) that sheep in these areas are extremely vulnerable to airplane utilizing rifle hunters.

For all of these reasons, we need to start thinking about way to maintain opportunity but decrease harvest. One of these ways is to make the hunting a little bit harder through the transition to archery only hunting. Archery only sheep hunts are the perfect solution. Anyone can buy and fairly quickly learn to use a bow and everyone who wants to hunt sheep will still have the same opportunity to be out there hunting and enjoying the pursuit of these amazing animals in amazing places. The hunting will just be a little more difficult and, resulting in fewer animals being killed every year.

**PROPOSED BY:** Paul Forward

(EG-F23-296)

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## **PROPOSAL 162**

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

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only as follows:

That area, identified on ANWR land status maps as GUA/ARC-01

**Resident: HT: One ram full curl or larger, by bow and arrow only.**

**Nonresident: HT: One ram full curl or larger every four years by bow and arrow only.**

**What is the issue you would like the board to address and why?** We need to adopt archery only sheep hunting areas as a conservation management tool that will maintain hunting opportunity for all but will decrease harvest. This proposal, similar to several others here is proposing a region wide transition to archery only for sheep hunting in the interest of preserving hunting opportunity in the face of sheep population decline.

Throughout the state sheep populations are generally in decline. This has been the topic of constant discussion at the state and federal level of wildlife managers and has led to a recent closure in the federal lands west of the Sagavanirktok River. Further south, in Unit 19C, this decline has resulted in an emergency closure to nonresidents at the most recent Board of Game (BOG) meeting. Sheep are in decline and concern has been raised by biologists throughout the state that full-curl management (FCM) may not be sufficient. Closures and transition to draw hunts have been the primary tools utilized by ADF&G but this proposal encourages the BOG to consider using archery hunts as a conservation management tool. Both with sheep in Alaska (DS 140/141, 240/241) and many other species in the state and around North America, archery areas and/or seasons have consistently shown that management by archery creates the ideal situation of maintaining opportunity while decreasing harvest. It is a perfect solution that benefits the game population while having very little negative affect on hunters. It simply makes the hunting a little more difficult. Skilled and/or lucky hunters will still harvest rams but the overall take will be much smaller.

Aside from a very narrow portion of the Brooks Range within the Dalton Highway Corridor, Alaska does not have any areas or seasons for for sheep. In contrast, we have at least limited seasons and a few set aside areas for hunting almost every other big game species in the state. Similarly, in British Columbia and Alberta there are designated archery areas or seasons available to all hunters. Because of the nature of archery hunting and the time and stealth often required, it is less compatible with having rifle hunters in the area, especially when some rifle hunters are shooting at 500+ yards.

For well over a decade hundreds of bowhunters have stepped forward, representing potentially thousands more hunters, resident and nonresident, requesting archery sheep seasons but thus far the BOG and ADF&G have not been willing to provide opportunity. This proposal, of taking a specific area and transitioning it to archery only for sheep will maintain opportunity for all hunters (they need only take bow instead of a rifle) but will answer the decades of request for such an area.

Despite biologists consistently telling us that sheep numbers, overall are in decline in much of the Brooks Range (and elsewhere in the state), the harvest numbers from the nonresident hunters in ANWR have shown no significant decrease. I will enclose numbers in supporting documentation but, for example, harvest statistics since 2012 show that guided hunters in ANWR had their highest harvest number ever in 2020, with the 3rd highest being 2021. With use of extensive aerial scouting hunters in these areas year

after year, have success rates above 80%. Similarly, based on ADF&G statistics resident hunters using airplanes in those same areas are also reporting success rates above 60-70% despite official and anecdotal reports that overall sheep are much more sparse than they've been in decades. It would be reasonable to conclude that the nature of this terrain and the ability to easily scout large areas by plane pre-season (and very difficult enforcement of in-season scouting) that sheep in these areas are extremely vulnerable to airplane utilizing rifle hunters.

For all of these reasons, we need to start thinking about way to maintain opportunity but decrease harvest. One of these ways is to make the hunting a little bit harder through the transition to archery only hunting. Archery only sheep hunts are the perfect solution. Anyone can buy and fairly quickly learn to use a bow and everyone who wants to hunt sheep will still have the same opportunity to be out there hunting and enjoying the pursuit of these amazing animals in amazing places. The hunting will just be a little more difficult and, resulting in fewer animals being killed every year.

**PROPOSED BY:** Paul Forward

(EG-F23-295)

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### **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 as follows:

Align meat on bone for caribou in Unit 25B, C, and D with Unit 25A to require the meat of the front quarters, hindquarters, and ribs to be left on the bone prior to October 1 until removed from the field or processed for human consumption.

**What is the issue you would like the board to address and why?** This would prevent spoilage in the hot fall weather because it would make the meat easier to handle when hanging and/or transporting.

**PROPOSED BY:** Amanda Pope

(HQ-F23-005)

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### **PROPOSAL 164**

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

Require the liver, heart, and tongue of moose and caribou harvested in Units 25 to be salvaged as follows:

Organ meat such as liver, heart, and tongue must be salvaged in Units 25A, 25B, 25C, and 25D.

**What is the issue you would like the board to address and why?** If organ meat such as liver, heart, and tongue of a beef cow can be purchased in a retail store, it should be salvaged when a moose or caribou is harvested. If organ meat is good, salvageable for human consumption, then it should be taken out of the field. If the person doesn't eat the organ meat, then those parts can be donated to the nearest community.

**PROPOSED BY:** Amanda Pope

(HQ-F23-006)

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## **PROPOSAL 165**

### **5 AAC 92.XXX. Intensive Management Plans.**

Create an intensive management plan for reducing wolves in Unit 25D as follows:

Establish a wolf population reduction plan in Unit 25D and issue permits for same-day airborne shooting/public taking of wolves by land and shoot on private and state lands as allowed under 5 AAC 92.039.

**What is the issue you would like the board to address and why?** Allow same-day airborne shooting/public taking of wolves by land and shoot in Unit 25D.

Our moose population in Unit 25D is low. Probably one of the lowest in the state. There are seven villages in Unit 25D which mostly subsist on moose meat as their primary food. The state managed lands are only a certain percentage of Unit 25D. This proposal mostly applies to tribal corporation/private lands in the refuge. Wolves and bears are becoming more and more abundant in Unit 25D. We are needing to hunt, trap, and shoot as many as possible in these seven communities. There have been reports of wolves and bears within the communities at certain times of year – bears in the summer months, and wolves in the winter months – all which are looking for food closer and closer to villages. Moose are tending to stay closer to communities in order to find safety. Wolf packs are always getting larger, breeding six to eight wolf pups per year. And living in remote areas of the refuge. Black bears and brown bears are hunting moose calves thru out the birthing times. We need more resources (tools in the toolbox) to address the need to reduce the number of wolves and bears in Unit 25D in order to bring our moose populations back up to a more sustainable level.

**PROPOSED BY:** Yukon Flats Fish and Game Advisory Committee

(EG-F23-318)

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## **PROPOSAL 166**

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

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

Establish trapping seasons for black and brown/grizzly bears and allow black and brown/grizzly bears to be taken by bucket snares in Unit 25D as follows:

Add bucket snaring under trapping regulations as a legal method of taking black and brown bear (grizzlies) in Unit 25D. Request the Board of Game (BOG) and ADF&G to develop seasons and regulations associated with implementing bear bucket snaring.

**What is the issue you would like the board to address and why?** People can take five black bears and 2 brown bears (grizzlies) a year including sows and cubs. I would like to allow people to harvest more bears for human consumption using the bucket snaring method, under trapping regulations. This would be a more efficient method to harvest a bear than baiting bears alone. I added brown bears (grizzlies) because you can take them over bait, so allowing them to also be taken legally using a bucket snare would be beneficial for those who want to fill their freezers. This would also help the declining moose population in the unit.

**PROPOSED BY:** Amanda Pope

(HQ-F23-004)

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## **PROPOSAL 167**

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

Lengthen the season dates for Unit 26B nonresident drawing brown bear hunt DB987 by opening the season two weeks earlier, on August 10 as follows:

DB987: Season dates: 08/10/20xx - 05/31/20xx

**What is the issue you would like the board to address and why?** DB987: I would like to propose that the season dates be extended to begin on August 10th. An earlier start date of August 10th instead of August 25th would allow for more harvest opportunity on grizzly bears. Over harvest would not be a concern because DB987 has a set number of permits available for nonresidents.

**PROPOSED BY:** Emily Thoft

(EG-F23-247)

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## **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 as follows:

Extend the brown bear spring season to **Jan 1 - June 15th** in Unit 26B "Within Dalton Highway Corridor" and Unit 26B Remainder.

Open the fall season 15 days earlier to **Aug 10- Dec 31** in hunt area Unit 26B Remainder.

Align the nonresident hunt dates of DB987 to match the resident dates and allow a nonresident with a draw permit to hunt **Aug 10-June 15**

**What is the issue you would like the board to address and why?** Lost brown bear hunting opportunity in the spring and fall seasons in Unit 26B hunts RB988/989 and nonresident draw hunt DB987.

The hunts in these areas are closely managed by registration and draw harvest reporting. Therefore a risk to over harvest is not a concern.

There will be some concern about harvesting bears with poor hide quality if spring dates are extended however some bears have poor hides in the spring and fall and hunters can be selective and avoid harvesting a bear with a poor hide.

**PROPOSED BY:** Craig Van Arsdale

(EG-F23-308)

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## **PROPOSAL 169**

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

Remove the resident registration permits RB988 and RB989 for brown bear in Unit 26B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 26(B), that portion within the Dalton Highway Corridor Management Area		
RESIDENT HUNTERS: 1 bear every regulatory year [BY REGISTRATION PERMIT ONLY]; by bow and arrow only;[ OR	Aug. 10 – <b><u>May 31</u></b> [AUG. 24]	
1 BEAR EVERY REGULATORY YEAR BY REGISTRATION PERMIT ONLY]	[AUG. 25 – MAY 31]	
NONRESIDENT HUNTERS: 1 bear every regulatory year by drawing permit only; up to 20 permits may be issued in combination with the remainder of 26(B)		Aug. 25 – May 31
Remainder of Unit 26(B)		
RESIDENT HUNTERS: 1 bear every regulatory year [BY REGISTRATION PERMIT ONLY]	Aug. 25 – May 31	
NONRESIDENT HUNTERS: 1 bear every regulatory year by drawing permit only; up to 20 permits may be issued in combination with that portion of Unit 26(B) within the Dalton Highway Corridor Management Area		Aug. 25 – May 31

**What is the issue you would like the board to address and why?** These registration permits were put in place as a measure to limit the hunting pressure on brown bears in Unit 26B. These registration permits were not limited in recent years and the harvest has remained below management objectives. Removing the requirement for obtaining a registration permit prior to hunting in Unit 26B may allow more opportunistic hunting to occur where there is a harvestable surplus.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-052)

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### **PROPOSAL 170**

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

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

Proposed regulatory language would read:

#### **5 AAC 84.270(14) Wolverine.**

Units 19, remainder of 20(C), 21, 24, and 25 (except 25(A) and 25(C)) Nov. 1 - Mar. 31 No limit. Units 22, 23, and 26 Nov. 1 - Apr. 15 No limit.

#### **Unit 25(A), Nov 1 - April 15, No limit.**

**What is the issue you would like the board to address and why?** I would like to change the closing date for trapping wolverine in Unit 25A by extending the closure date from March 31 to April 15.

I am writing this proposal to request an extension of the trapping season for wolverine in Unit 25A. Wolverine trapping season currently closes on March 31. I am requesting that the season closure date be extended to April 15.

I have been a trapper in the upper part of Unit 25A since the 1980s and have not only seen some of the coldest winters in Alaska but also some of the longest. Many winters in this area last several weeks longer than many parts of the interior. This being said, I feel wolverine trapping can not only be extended until April 15, and still produce well primed pelts, but the weather at that time of year can be advantageous for longer trapping days.

Unit 26C is the adjacent unit to the north where the trapping season for wolverine is open until April 15th. With very similar winter conditions and seasonal changes for both units (at least in the upper portion of Unit 25A), I feel wolverine trapping for Unit 25A can be extended with no issues. Thank you for your consideration.

**PROPOSED BY:** Daniel Hayden

(EG-F23-249)

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## **Fairbanks Area – Units 20A, 20B, 20C, 20F & 25C**

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### **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 as follows:

Require a registration permit instead of a general season harvest ticket for all general season moose hunts in Units 20A, 20B, 20C, 20F, and 25C. No changes to seasons or bag limits.

**What is the issue you would like the board to address and why?** The Fairbanks area Units 20A, 20B, 20C, 20F and 25C, have some of the highest hunter effort and harvest in the state. During 2018-2022 an average of 5,088 hunters harvested 1,200 moose from these units. Units 20A, 20B and 20C are designated Intensive Management (IM) units and are managed for high harvest. Units 20F and 25C both have low density moose populations but are highly accessible and have “any bull” bag limits. The department would like to switch from harvest tickets in these units to one single registration permit. This would allow the department to collect more reliable harvest and effort data and help maximize moose hunting opportunity and harvest. Registration permits allow the department to better track how many permits are issued and have proven to provide the department more accurate and reliable harvest and effort data. Issuing one permit for all five units makes it easier for hunters to have the proper paperwork to hunt an area. Hunters would also be able to obtain these permits at any ADF&G office and they would also be available online.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-058)

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### **PROPOSAL 172**

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

Create a muzzleloader only moose hunt for residents and nonresidents in Unit 20A as follows:

We would like the Board of Game to consider creating a new draw hunt in Unit 20A for certified muzzleloader hunters. A legal animal would be defined as any bull for residents and four brow tines or 50” or more for nonresidents. The hunt area would be the Yanert River drainage, above Revine Creek, including the portion of the Moody Creek drainage above the mouth of Copeland Creek. The hunt dates would be the same as the current DM766 permit (Nov. 1-Dec. 15). The proposed area is away from residential housing and the highway; and would therefore take some planning to be successful, similar to DM766. The number of permits would be set by the local moose biologist’s recommendation annually, but I would anticipate up to 40 permits be made available.

**What is the issue you would like the board to address and why?** There are a limited number of winter moose hunts available. The current muzzleloader hunt in Unit 20A (DM766) is becoming more popular and is only available to hunters at most every other year, due to the regulation limiting hunters to not apply for draw hunts the following year after they have been awarded a permit. Creating a draw hunt in the Yanert and Moody River drainages with a limited number of permits would enable hunters to access an area that is normally difficult to access during general season. Harvesting a limited number of bulls would likely have little impact on the overall population.

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**PROPOSAL 173**

**5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20A as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(18)

Unit 20(A), the Ferry Trail  
Management Area,  
Wood River Controlled  
Use Area, and the Yanert  
Controlled Use Area

**RESIDENT HUNTERS:**

...

1 antlerless moose by  
drawing permit only; up  
to 2,000 permits may  
be issued in combination  
with the Remainder of  
Unit 20(A); a person may  
not take a cow accompanied  
by a calf; or

Aug. 15–Nov. 15

1 antlerless moose by  
registration permit only;  
a person may not take  
a cow accompanied by a  
calf; or

Oct. 1–Feb. 28

...

1 moose by targeted  
permit only; by crossbow  
shotgun, or bow and arrow  
only; up to 100 permits may  
be issued

Season to be announced  
by emergency order

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts are important for maintaining the moose population at levels that the habitat can support. Antlerless hunts also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull:cow ratios.

If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Subsistence hunters in the portion of Unit 20A outside the

Fairbanks Nonsubsistence Area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

Reauthorizing antlerless moose hunts will allow hunting opportunity and harvest to increase and allow the Department of Fish and Game to manage the moose populations at an optimum level. The additional harvest will help in meeting IM harvest objectives without reducing bull:cow ratios. Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at a level compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The current objective is to maintain moose numbers within the IM population objective of 10,000–15,000 moose, while monitoring indicators of moose and habitat condition for positive density-dependent responses. The Unit 20A population was estimated at between 9,240–12,800 moose (90% confidence interval) in November 2022. There is an estimated 5,040 mi<sup>2</sup> of moose habitat in Unit 20A which equates to a moose density of between 1.8 and 2.5 moose/mi<sup>2</sup>. The median of this estimate falls within the IM population objective. The department will continue to monitor Unit 20A twinning rates and short yearling weights as indices of nutritional condition for this moose population. The department has observed a slow and consistent increase in both twinning rates (16%) and short yearling weights (400lbs) and are nearing the nutritional thresholds of 20% twinning rates and 400lb short yearlings. This indicates that the nutritional condition of this population is improving. However, the department does not want the population to further increase until we observe both 20% twinning rate and 400lb short yearlings weight thresholds. The department will continue to monitor Unit 20A twinning rates and short yearling weights and may recommend fewer antlerless hunts in the future if these two thresholds are surpassed. However, at the current density of moose, the intention is to harvest antlerless moose at a rate of 1% of the population (92-128 antlerless moose) which has been shown to stabilize the moose population at its current level. Antlerless harvest will occur by drawing permit for a majority of Unit 20A and by registration permit outside the Fairbanks non-subsistence area in northwest Unit 20A near Nenana. The harvest objective will be based on the most recent survey results. The antlerless harvest will target the highest density portions of Unit 20A. The department did not issue antlerless moose permits in 2022 because of the severe winter that occurred in 2021/2022 and the anticipated increased mortality. Antlerless moose permits in 2023 were not issued because a population estimate was not completed until after the drawing permit application period ended. The next possible antlerless moose hunt would occur in the fall of 2025.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-042)

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## **PROPOSAL 174**

### **5 AAC 92.540. Controlled use areas.**

Change the boundary of the Wood River Controlled Use Area in Unit 20A as follows:

Change the Western Boundary of the Wood River Controlled Use Area (WRCUA) to **"then along the Eastern bank of Dexter Creek to the confluence of All Gold Creek, then following a straight line to the intersection of the Totatlanika River and the established Ferry Trail, and then down the East Bank of the Totatlanika River to"** from "THEN ALONG THE EAST BANK OF DEXTER CREEK TO THE TOTATLANIKA RIVER, AND THEN DOWN THE EAST BANK OF THE TOTATLANIKA RIVER".

**What is the issue you would like the board to address and why?** Modify the Wood River Controlled Use Area (WRCUA) boundary line for a portion of the Totatlanika River boundary line. The specific area is the portion that lies between Dexter Creek and the Ferry Trail intersection along the Totatlanika River. This portion of the Totatlanika River has established mining trails that weave from bank to bank of the river, some of which cross the current boundary for the WRCUA. Hunters have been cited for crossing the boundary line while on the established mining trails along the river and unnecessary trails are being created across the nearby marshy tundra to avoid such citations. This change will minimally impact the usable portion of the WRCUA and simply serve to facilitate travel along existing trails as well as minimize impact on the landscape from unnecessary trail creation/use.

**PROPOSED BY:** Middle Nenana River Advisory Committee

(EG-F23-272)

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## **PROPOSAL 175**

### **5 AAC 92.540. Controlled use areas.**

Change the boundary of the Wood River Controlled Use Area in Unit 20A as follows:

Change the boundary of the Wood River Controlled Use Area (WRCUA) to: "then along the Eastern bank of Dexter Creek to [THE TOTATLANIKA RIVER] **the confluence of All Gold Creek, then following a straight line to Murphy Peak, then following a straight line to the intersection of the Totatlanika River and the Ferry Trail,** and then down the east bank of the Totatlanika River to the Rex Trail.

**What is the issue you would like the board to address and why?** The Wood River Controlled Use Area (WRCUA) has as a portion of its boundary the Totatlanika River, from its headwaters at All Gold and Dexter Creeks to where it meets the Ferry Trail. That area has established mining trails that have been in constant use for 100 years or so. Over the years, the river's course has changed and portions of the trail cross the river at various points, creating confusion for hunters and leading to tickets. The only alternatives for hunters are 1) to create new routes across the tundra, which is pretty hard on the tundra or 2) drive up the river, which could negatively impact the stream habitat. Please consider modifying the boundary of the WRCUA. This change would have minimal impact on the WRCUA as a whole, but would provide clarity and protect the surrounding environment by using existing trails.

**PROPOSED BY:** Joseph Kurber

(EG-F23-258)

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## **PROPOSAL 176**

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

Reduce the nonresident moose bag limit in portions of Unit 20B, and eliminate nonresident moose hunting opportunity in portions of Unit 20B as follows:

Change nonresident any-bull moose hunts for nonresidents in Unit 20B drainage of the Middle (East) Fork of the Chena River, and Unit 20B Salcha River drainage upstream from and including Goose Creek, to one bull with 50-inch antlers, or antlers with four or more brow tines on at least one side.

Change nonresident any-bull moose hunts in Unit 20B within Creamer's Field Migratory Waterfowl Refuge, and Unit 20B remainder of Fairbanks Management Area, to one bull with 50-inch antlers, or antlers with four or more brow tines on at least one side. Remove opportunity for nonresidents to harvest antlerless moose

*All resident bag limits and seasons remain the same.*

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

**Unit 20B drainage of the Middle Fork of the Chena River, and Unit 20B that portion of the Salcha River drainage upstream from and including Goose Creek:**

**One bull with 50-inch antlers,  
or antlers with 4 or more brow  
tines on at least one side** [ONE BULL]

**Nonresidents**  
Sept 1 – Sept 25

**One bull with 50-inch antlers,  
or antlers with 4 or more brow  
tines on at least one side** [ONE BULL]  
*by bow and arrow only*

Sept 26 – Sept 30

**Unit 20B within Creamer's Field Migratory Waterfowl Refuge:**

**One bull with 50-inch antlers,  
or antlers with 4 or more brow  
tines on at least one side** [ONE BULL  
WITH SPIKE FORK OR GREATER  
ANTLERS] *by bow and arrow only*

**Nonresidents**  
Sept 1 – Sept 30  
Nov 21 – Nov 27

**OR**

One antlerless moose *by bow and arrow only*  
by permit DM 786/788

**No open season** [SEPT 1 – NOV 27]

**OR**



One antlerless moose *by muzzleloader only*  
by permit DM 789

**No open season** [DEC 1 – JAN 31]

**Unit 20B remainder of Fairbanks Management Area:**

**One bull with 50-inch antlers,**  
**or antlers with 4 or more brow**  
**tines on at least one side** [ONE BULL  
WITH SPIKE FORK OR GREATER  
ANTLERS] *by bow and arrow only*

**Nonresidents**  
Sept 1 – Sept 30  
Nov 21 – Nov 27

**OR**

One antlerless moose *by bow and arrow only*  
by permit DM 786/788

**No open season** [SEPT 1 – NOV 27]

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

**Nonresident opportunities for antlerless and any-bull moose hunts.**

Any-bull moose hunts are coveted by resident Alaskans who want to put meat in their freezer and feed their families. Not having to judge the antlers on a bull moose, and being able to take younger bulls, prevents sub-legal harvests and ensures a higher success rate. Over-the-counter any-bull moose hunts, such as the ones in Unit 20B, are especially helpful to residents.

The taking of cows under antlerless hunts is designed to be a resident-only opportunity to put meat in the freezer under our Intensive Management law.

We do not believe the state should allow nonresidents to participate in any-bull or antlerless moose hunts in the interior, whether by over-the-counter or draw permits. These types of hunts are “meat” hunts designed to provide more opportunity for Alaskans to put food on the table. Most nonresident moose hunters are not hunting to put food in their freezers, and there are plenty of nonresident over-the-counter moose hunting opportunities in the interior and statewide for bulls with antler restrictions.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F23-018)

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**PROPOSAL 177**

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

Extend the current moose season in Unit 20B Remainder by five days for certified bowhunters only as follows:

Unit 20B, remainder

Residents only

Bag limit: One bull

Season dates: Sept 1 – Sept 15

**OR**

**ONE BULL BY BOW AND ARROW:**

**SEPT 16 – SEPT 20**

Unit 20B, remainder

Nonresidents

Bag limit: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side.

Season dates: Sept 5 – Sept 15

**OR**

**ONE BULL WITH 50-INCH ANTLERS OR ANTLERS WITH 4 OR MORE BROW TINES ON AT LEAST ONE SIDE BY BOW AND ARROW:**

**SEPT 16 - SEPT 20**

**What is the issue you would like the board to address and why?** An additional five days for bowhunters in Unit 20B remainder would afford much greater hunting opportunity while at the same time keeping the impact on the resource to a minimum. There are already two areas within Unit 20B that have an additional five day season for bowhunters which extends from September 26 - September 30.

**PROPOSED BY:** Alaskan Bowhunters Association

(EG-F23-289)

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## **PROPOSAL 178**

### **5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20B as follows:

<b>Units and Bag Limits (18)</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
...		
Unit 20(B), that portion within Creamer's refuge		
...		
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27	Sept. 1–Nov. 27
1 antlerless moose by muzzle-loader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area	Dec. 1–Jan. 31	Dec. 1–Jan. 31
Unit 20(B), remainder of the Fairbanks Management Area		
...		
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27	Sept. 1–Nov. 27

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
1 moose by targeted permit only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
Unit 20(B), that portion within the Minto Flats Management Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by registration permit only	Oct. 15–Feb. 28	No open season.
...		
Unit 20(B), the drainage of the Middle Fork of the Chena River		
1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Feb. 28	No open season.
...		
Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway		
...		
1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Last day of Feb.	No open season.
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
Remainder of Unit 20(B)		
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14	No open season
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull:cow ratios.

If antlerless moose hunts are not reauthorized, the moose population may exceed population objectives causing habitat degradation and a loss of opportunity to hunt a surplus of antlerless moose. The reauthorization of antlerless moose hunts in Unit 20B will allow Alaska Department of Fish and Game (ADF&G) to manage the moose population within the population objectives of 12,000 to 15,000 moose. Hunting opportunity and harvest will increase, and antlerless hunts allow ADF&G to manage this moose population at optimum levels. The additional harvest is necessary to meet intensive management harvest objectives while maintaining bull:cow ratios within objectives. Moose populations will benefit by maintaining moose densities at levels compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The moose population level in Unit 20B is currently within the population objective of 12,000–15,000 moose. The population declined from an estimated 20,173 moose in 2009 to 11,064 in 2015, due in large part to antlerless moose hunts designed to lower the population to those objectives. The population increased slightly to 12,871 moose in 2017 and was estimated at 12,479 in 2020. A population estimate in Unit 20B has not been completed since the winter of 2022 which likely cause reduced survival of moose due to deep snow and rain on snow events. The department suggests that antlerless hunts should be limited until we can evaluate this population. The department recommends limited antlerless hunts in the Fairbanks Management Area (FMA) and the Richardson Highway corridor hunt. The department will continue to monitor the moose population and may implement additional antlerless hunts in the future if the population can sustain the harvest.

*Fairbanks Management Area (FMA)*—The purpose of this antlerless hunt is to regulate population growth in the FMA and reduce potential moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA is high and pose significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest and reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during RY99–RY10. Moose–vehicle collisions and moose nuisance problems have remained low since, presumably, in part due to consistent antlerless moose harvests.

*Richardson Highway Corridor Hunt*—This hunt is an “any” moose drawing permit that allows hunters to hunt within a half mile of each side of the Richardson Highway. The purpose of this hunt is to allow hunters to harvest moose along the Richardson Highway to help reduce moose-vehicle collisions.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-043)  
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## **PROPOSAL 179**

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

Shift the moose season dates in Unit 20B as follows:

Move season for residents to Sept 15th - 30th.

**What is the issue you would like the board to address and why?** It is becoming more difficult to keep game fresh in early September. Temperatures have changed since the 1980’s. There used to be cooler temps and ice, now many hunting days reach 60 degrees or more during hunting season.

**PROPOSED BY:** Alan Horstman (EG-F23-168)  
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## **PROPOSAL 180**

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

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

Change the allocation of permits for Delta caribou hunt DC827 in Unit 20A as follows:

Rescind action taken by the board on Proposal 146 in 2020 that guaranteed nonresident allocation of 25% of all DC827 permits.

**OR**

Establish an allocation of DC827 permits whereby residents receive 90% of the permits and nonresidents up to 10 percent of the permits.

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

**DC 827 permit allocation to nonresidents**

At the 2020 Interior and Eastern Arctic Region meeting, the Board of Game deliberated on Proposal 146, which requested that the allocation for the DC827 caribou hunt be set to a firm 90/10 resident/nonresident allocation. We brought up that hunt bookers were flooding the permit pool with application and as it was an open draw for all that nonresidents were now getting 25% of the permits.

The board amended Proposal 146 to completely change it 180 degrees, to permanently grant nonresidents 25 percent of the DC827 permits, which passed and became regulation.

Subsequently a request was sent to the Board of Game referring to the Board of Fisheries policy that prohibits amendments to proposals that completely change the intent, asking the board to institute that same policy. These kind of amendments that change a proposal from the complete opposite of what was intended should not be allowed. The board voted not to adopt such a policy.

What the board did in 2020 with Proposal 146 was wrong. The issues we still have with hunt bookers flooding the application pools continues for other permit hunts that are open to both residents and nonresidents equally.

Any draw-permit hunt in the state, no matter what species, is based on there not being enough animals for everyone to have the opportunity to hunt. Every draw permit in the state should have a 90/10 resident/nonresident percentage allocation and provide a clear priority for Alaskan hunters.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F23-013)

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## **PROPOSAL 181**

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

Limit nonresident sheep hunting in Unit 20A by drawing permit only as follows:

Limit nonresident sheep hunters in Unit 20A to draw only permits with a limited allocation of up to 20 permits.

#### **Unit 20 Remainder Nonresident Hunters**

**One ram with full curl horn or larger  
by drawing permit only, every four  
regulatory years; up to 20 permits may be issued**

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORNS  
OR LARGER EVERY FOUR REGULATORY YEARS]

We understand that the board and the department may want higher “up to” language so when/if the sheep population increases the number of permits can increase. At this time, however, considering the declining sheep population in Unit 20A and the extremely low recruitment, we do not believe nonresidents should receive more than 20 permits.

Alternatively, the board has in the past set regulations for sheep hunting that only offer hunting opportunity when there is a certain amount of estimated harvestable surplus. So, if for example the estimated harvestable surplus of sheep in Unit 20A was 50 legal rams, the board could, under a nonresident draw permit system, allocate a percentage of the harvestable surplus to nonresidents.

We would support allocating 25% of the estimated harvestable surplus to nonresidents under such a system, which would look like this:

#### **Unit 20 Remainder Nonresident Hunters**

**One ram with full curl horn or larger  
by drawing permit only, every four  
regulatory years; the number of permits  
issued is up to 25 percent of the estimated  
harvestable surplus**

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN  
OR LARGER EVERY FOUR REGULATORY YEARS]

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

- Conservation concerns for the declining sheep population in Unit 20A.
- Continued unlimited nonresident sheep hunting opportunity in Unit 20A
- Nonresident sheep hunters taking majority of the harvest in Unit 20A



- Crowding and conflicts with unlimited nonresident sheep hunting opportunity in Unit 20A
- Concerns residents could lose general sheep hunting opportunity in Unit 20A.
- Questions on whether FC harvest management is always sustainable.

At the 2023 Southcentral Region meeting in Soldotna, the Board of Game spent considerable time deliberating board-generated Proposal 204 to completely close sheep hunting in Unit 19C for five years, based on conservation concerns the board had for that declining sheep population.

The department opposed Proposal 204, saying that while they were concerned with the recent sheep population declines, they had no conservation concerns for the sheep population because full-curl management (FCM) was sustainable under all conditions. Hunting was not the cause of sheep declines, they said, and any hunting restrictions would not help the sheep rebound faster.

The board, however, questioned the department's position on FCM harvest sustainability, based on recommendations the department made in the past to restrict sheep hunting in other areas that allowed unlimited hunting opportunity. For example, the department used an Emergency Order in 2014 to close all sheep hunting in Unit 23, and recommended that the board completely close Unit 23 to all sheep hunting in 2015, based on conservation concerns for the sheep population.

Unit 23 is still closed to all state sheep hunts, even though the sheep population there is much higher than in other areas, like the Kenai Peninsula, where the Department opposes any sheep hunting restrictions.

### **Department Position that Unlimited Sheep Hunting Opportunity under FC Harvest Management is Sustainable Doesn't Add Up**

Here is part of the Department's statement and justification for closing Unit 23 to all sheep hunting in 2014<sup>1</sup>: *"This emergency order closes all sheep seasons in Game Management Units 23 and 26(A) for all resident and nonresident hunters due to severe decline in sheep numbers in the contiguous populations of the DeLong Mountains and Schwatka Mountains.*

*Sheep populations in the western Brooks Range within Units 23 and 26(A) experienced severe winter conditions in 2013-2014. Starvation and loss of protective habitat resulting from ground-fast ice have contributed to increased declines of sheep populations in the De Long Mountains and Schwatka Mountains. Previous declines during 2009–2011, low reproductive potential, and poor lamb production over a multi-year period have significantly reduced the number of sheep in Units 23 and 26(A).*

*The large decline in the overall population, the low numbers of rams in the population, and the apparent very low recruitment rate **all suggest that any level of harvest could be detrimental to the population, prolong the decline, and limit recovery.**"* [our emphasis]

This statement from the department on the Unit 23 sheep hunting closure is the exact opposite of what the department has been saying about other sheep populations in other areas (like Unit 19C and 20A) that are experiencing similar declines for similar reasons. For those areas, the department has stated that continued unlimited sheep hunting opportunity will **not** prolong the declines and will **not** limit recovery.

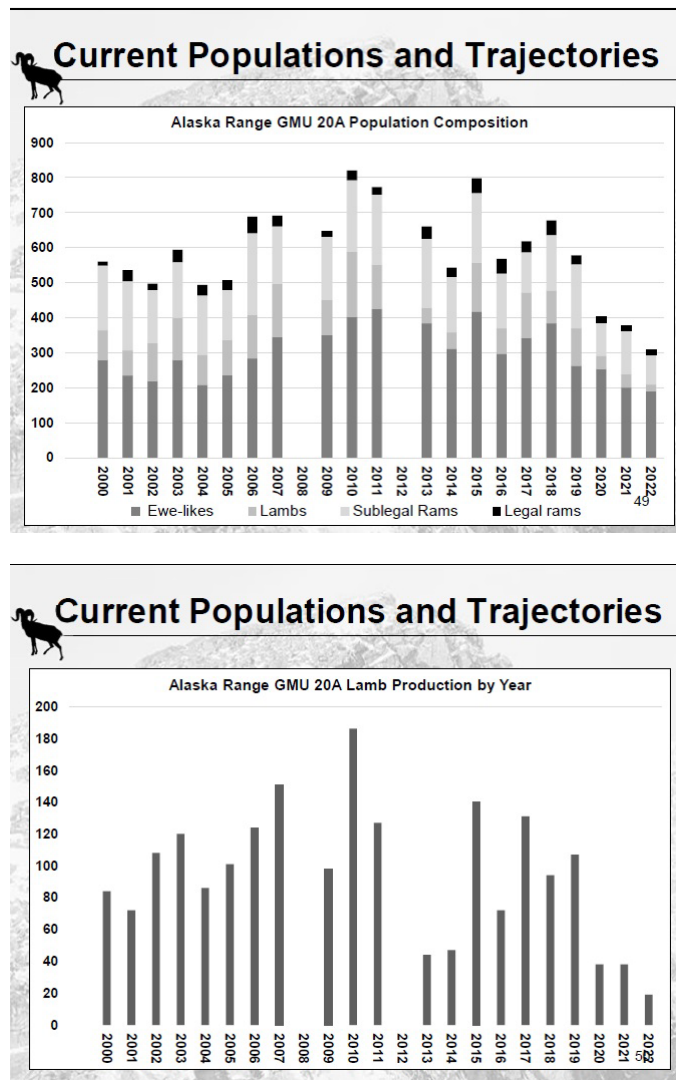
## And What About the Sheep Hunting Restrictions in the Chugach Mountains?

A similar thing happened in the Chugach Mountains where maximum sheep hunting opportunity was allowed under FCM harvest, until the department suddenly had conservation concerns for that sheep population in 2008 and recommended hunting restrictions, which the board then passed and are still in place today.

These concrete examples of the department disagreeing with their own premise that unlimited sheep hunting opportunity under FCM harvest is always sustainable are why we believe that continued unlimited nonresident sheep hunting opportunity in Unit 20A needs to be curtailed and limited.

Below are sheep population and harvest data from the Department and further comments.

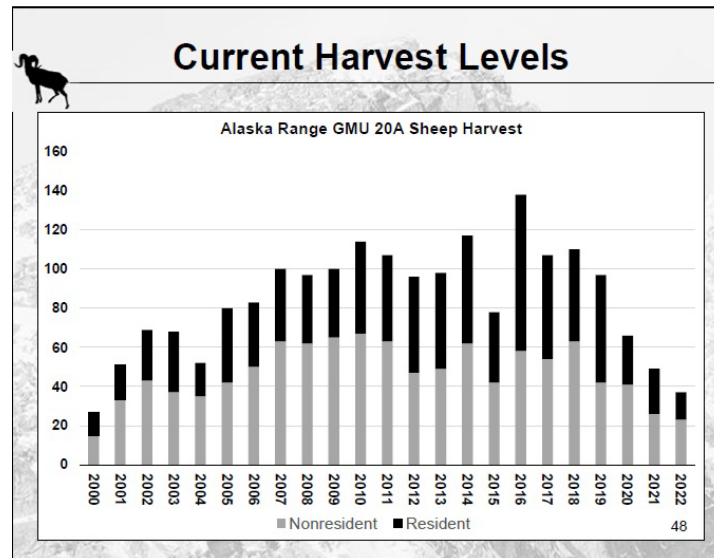
### ADF&G 20A Sheep Population & Harvest Data:



Looking at the increased lamb production in 2015 and 2017 may lead one to believe that 2023 and 2025 will see better legal ram numbers, but information from the most recent 2022 trend count shows that recent severe winters have devastated those cohorts, as well as recruitment the past few years.

The low lamb recruitment the past three years in Unit 20A is as much a concern as the “*poor lamb production over a multi-year period*” that “*significantly reduced the number of sheep in Units 23 and 26(A)*” and led to the complete sheep hunting closure in those units.

The bottom line is that the near future for sheep in Unit 20A is grim.



Hunters consistently harvested 100 sheep from Unit 20A for over a decade, but consistent severe winters, late springs, predation and other factors led to steep population declines that became noticeable in the decreased harvest numbers starting in 2019.

#### Unit 20A Sheep Harvest Statistics from ADF&G (Last Five Years):

Year	Total Hunters	Resident Hunters	Nonres Hunters	Total Harvest	Nonres Harvest	Resident Harvest
2018	276	196	80	107	62	45
2019	249	183	66	89	40	48
2020	245	184	61	63	41	22
2021	179	134	45	44	26	18
2022	138	93	45	36	24	12

Average nonresident sheep harvest over last five years is 58%. **Nonresident hunters took 66% of the sheep harvest in 2022.**

Below are some quotes from the department memorandum with the results of the Unit 20A 2022 sheep survey:

*“The number of observed lambs in 2020 and 2021 was the fewest ever seen in the survey area dating back to 1983. This 2022 survey was the third consecutive year of exceeding the poorest lamb crop on record.”*

*“The number of sheep observed on this survey was the lowest ever observed in this survey area. The low number of sheep during the 2020, 2021 and 2022 surveys (Table 1) are likely attributed to 3 consecutive hard winters which had deep snow and late breakup, both of which can lead to poor lamb survival. This may have also had a negative effect on adult sheep as well. We are also entering the time frame in which the poor cohorts of 2013 and 2014 may be shown in the low number of legal rams available.”*

Again, this is comparable to the situation we had in Unit 23, yet somehow the department does not have any conservation concerns.

How can we trust the department not to eventually say they have conservation concerns for the sheep in Unit 20A and then recommend restrictions that once again fall on resident sheep hunters? It is past time for the board to put all nonresident sheep hunters in Unit 20A on draw-only hunts with a limited allocation to protect the sheep resource and protect resident sheep hunting opportunities.

<sup>1</sup><https://www.ADF&G.alaska.gov/static/applications/webintra/wcnews/2014/orders/05-06-14.pdf>

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F23-019)

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## **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 as follows:

Extend the brown bear season for residents and nonresidents in Units 20A, 20B, and 25C to June 15th.

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

Unit 20(A) and Remainder of Unit 20(B)

Unit 20(B)

Unit 25(C)

One bear every regulatory year

Resident Nonresident

Sept 1 – [May 31} **June 15** Sept 1 – [May 31} **June 15**

**What is the issue you would like the board to address and why?** Grizzly bears usually show up to bear bait sites in early June. This causes a safety concern to bear hunters trying to fill their freezers with black bear meat, and a loss of opportunity to take a grizzly bear over bait. Grizzly bears are an ever-increasing occurrence in June in Units 20A, 20B, and 25C. Extending the grizzly bear season by 15 days should not pose any conservation concern.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (EG-F23-217)

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## **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 as follows:

A solution would be simple and one that the public has been asking of the board for years. Extend grizzly season in Unit 20A until at a minimum of June 15th. This would align seasons more to other areas of Unit 20 as well where grizzly season has been permitted to stay open until June 30th. Similar changes in these other subunits of 20 that have allowed grizzly baiting later into June have proven to be effective without having an overall detriment to grizzly bear populations.

**What is the issue you would like the board to address and why?** In most of the Tanana Flats, grizzly's aren't moving out of the hills and becoming more apparent until late in May/June. For many hunters who bait in the flats, this becomes an issue as grizzlies take over bait stations, keeping black bears out of stations and limiting hunter success. Because of current season dates, hunters are unable to harvest grizzlies during this timeframe and help in reducing overall grizzly populations in the interior. Additionally because of this, hunters in the field are seeing an increasing abundance of grizzlies and fewer black bears as there have been traditionally in the Tanana Flats.

**PROPOSED BY:** Middle Nenana River Fish and Game Advisory Committee (EG-F23-314)

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## **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 as follows:

My solution is to change opening day of grizzly bear season in Unit 20A from September 1st to August 10th to coincide with sheep and caribou hunting seasons.

**What is the issue you would like the board to address and why?** I would like to propose grizzly bear season in Unit 20A open on August 10th rather than September 1st as many hunters are in the area hunting sheep and caribou at that time as well. From my personal experience, I have seen significant grizzly bear activity in the area while I am hunting. I would like to reduced the number of ewes, lambs and calves preyed upon during this time as well as feel safer as a hunter and have the opportunity to harvest the grizzly rather than dispatch for defense of life or property (DPL) and the subsequent measured needed following a DPL.

**PROPOSED BY:** Mylinda Cizmowski (EG-F23-234)

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## **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 as follows:

I believe the brown/grizzly season should be open until June 30th across all of Unit 20:

B 20A, 20B, 20C, 20F	One bear every regulatory year Sept 1-June 30
B 20E	Two bears every regulatory year Aug 10-June 30

**What is the issue you would like the board to address and why?** There is a large and healthy population of brown/grizzly bears in Unit 20 and we need to have the ability to use this resource as well as help our moose and caribou populations through more lenient limitations on brown/grizzly hunting within all of Unit 20.

**PROPOSED BY:** Tyrel Palmer

(EG-F23-206)

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### **PROPOSAL 186**

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

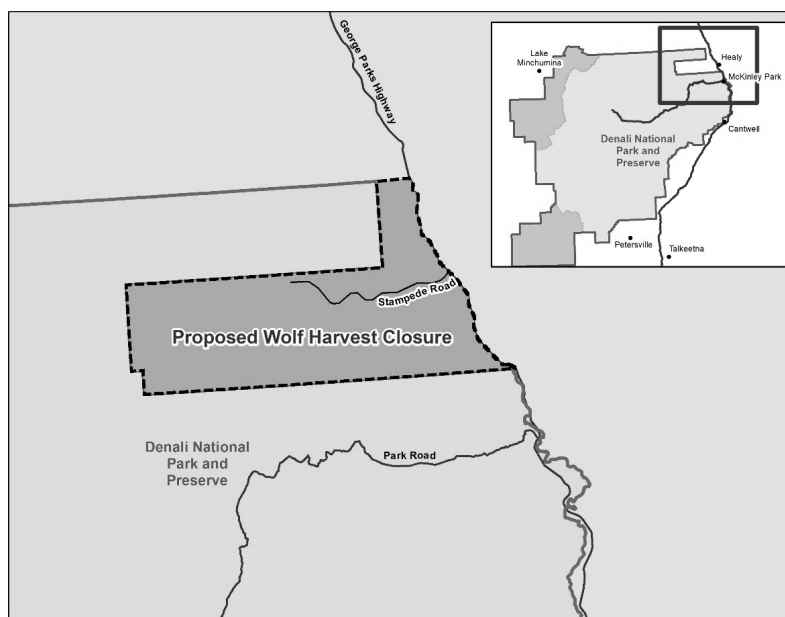
**5 AAC 92.550. Areas closed to trapping.**

Close a portion of Unit 20C to wolf hunting and trapping as follows:

**PROPOSAL: 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.**

Restore prohibition on the harvest of wolves in a portion of Unit 20C as follows:

Within Unit 20C; those portions of Uniform Coding Unit (UCU) 0607, 0605, and 0502 west of George Parks Highway and bounded by Denali National Park on three sides, is closed to the taking of wolves by hunting and by trapping.



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

### **ISSUE**

In Alaska, wolves are among the most desired species for viewing (Shea & Tankersley 1991), and state wildlife management includes mandates to provide for multiple uses, including non- consumptive uses such as wildlife viewing (Alaska Department of Fish and Game 2006).

Wildlife viewing also brings an important socioeconomic benefit to the state of Alaska. Wildlife viewing activities in Alaska supported over \$2.7 billion dollars in economic activity in 2011 and 40% of visitors to Alaska reported hoping to view wild wolves during their visit (ECONorthwest 2014).

More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali) provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park (Manning & Hallo 2010).

Wolf viewing opportunities in Denali are primarily provided by one to three packs of wolves that center their activity near the Denali Park Road during the summer months. Analysis of 14 years of data from the National Park Service (NPS) on wolves equipped with GPS radio collars shows that the same wolf packs that provide the majority of wolf sightings during the visitor season also show a pattern of use of areas just outside of the boundary of the park during the winter and spring. Harvest of wolves in this area has the potential to decrease wolf numbers, alter wolf behavior, and decrease opportunities for wolf viewing by park visitors. While wolf harvest just outside the northeastern boundary of the park may have little effect on regional wolf populations, it can have significant effects on wolf packs whose territories intersect the Park Road and on the experience of Denali's visitors.

Prior to the pandemic, over 400,000 people visited Denali annually (Fix, Ackerman & Fay 2012). The number of active trappers in the Stampede Corridor ranged from one to three in any given year (Alaska Department of Fish and Game 2013). The NPS recognizes the impact of the closure to the lifestyle and livelihood of these trappers may represent a significant trade-off.

### **WHAT SOLUTION DO YOU RECOMMEND?**

Within Game Management Unit 20C; those portions of Uniform Coding Unit (UCU) 0607, 0605, and 0502 west of George Parks Highway and bounded by Denali National Park on three sides, is closed to the taking of wolves by hunting and trapping.

The proposed closure represents the most effective closure in terms of limiting harvest of wolves that primarily reside within the boundaries of the park and provide the majority of wolf sightings. Additionally, the extent of the closure will facilitate interpretation of the effects of the closure on wolf sightings.

### **WHAT WILL HAPPEN IF NOTHING IS DONE?**

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. During periods when the harvest closure was in place, the probability of seeing a wolf from the Park Road was as high as 45%. Following the elimination of the harvest closure (2011 to 2019 - pre pandemic) the probability of seeing a park wolf ranged from 21% to 1%.

### **WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?**

This proposal would help to facilitate opportunities for Alaskans and others to see wolves along the Denali Park Road. It would have a small effect on the number of wolves harvested in the entirety of Unit 20C.

## WHO IS LIKELY TO BENEFIT?

- Visitors who come to Alaska to see a diversity of wildlife (~ 400,000 annually).
- Tour operators and the Alaska tourism industry that promote and provide wildlife viewing tour products.

## WHO IS LIKELY TO SUFFER?

Trappers and hunters who wish to harvest wolves in the area that we are proposing to close within the Stampede Corridor. This proposed change may impact the lifestyle or livelihood of trappers who use the area.

## OTHER SOLUTIONS CONSIDERED?

Previous proposals in 2017 and 2020 considered a reduced spatial extent and duration for a wolf harvest closure in the area.

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Manning, R. E., and J. C. Hallo. 2010. In Focus: Denali Park Road: The Denali Park Road experience: Indicators and standards of quality. Park Science 27(2):33–41.

Shea, L., & N. Tankersley. (1991). Wildlife watching and Alaska's tourism potential. Alaska's Wildlife. Alaska Department of Fish & Game. Juneau,23(2).

**PROPOSED BY:** Denali National Park and Preserve (HQ-F23-002)

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**Correction: The title for Proposal 187 incorrectly states the proposed change. The actual proposal asks to lengthen the wolverine trapping season in Unit 20C to March 31.**

## **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 as follows:

Units 19, 20C, 21, 24, 25A, 25B, and 25D..... Nov 1 - Mar 31.....No limit

Units 20A, 20B, 20D, 20F, and 25C ..... Nov 1 - Feb 28 .....No limit



**What is the issue you would like the board to address and why?** I would like to standardize the trapping season dates for wolverine in Unit 20C. Currently there is a small portion of the unit that has a much shorter trapping season than the remainder of the subunit. I would like to see the dates standardized to the longer season dates throughout. Sealing data indicates harvests of: 2017, 14 wolverine; 2018, 6 wolverine; 2019, 9 wolverine; 2020, 14 wolverine; and 2021, 15 wolverines harvested for all of Unit 20C. With Denali Park located in this subunit there is a significant land mass where trapping of wolverines is not allowed. So, it is unlikely that an overharvest would occur as a result of this change. Current wolf season in this unit run Nov. 1 – Apr. 30, lynx season in this area is Nov. 1- Mar. 15. It is possible for a wolverine to be caught in one of these sets, and the trapper would then need to turn it in as an incidental harvest.

**PROPOSED BY:** Raymond Heuer

(EG-F23-202)

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### **PROPOSAL 188**

**5 AAC 84.270. Furbearer trapping.**

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

Open beaver trapping in a portion of Unit 20B as follows:

I recommend opening beaver trapping in Unit 20B in “that portion of the Chena River downstream from its confluence with the Little Chena River,” using underwater/under-ice sets from 1 November until 15 April. This would expand trapping opportunities and allow for a modest harvest of beavers while ice covers the river, thereby helping to control the beaver population in this portion of the Chena River while minimizing the possibility of unintentional harm to or conflict with boaters, pets, and other recreational users of this portion of the river.

**What is the issue you would like the board to address and why?** Beaver trapping is currently closed in Unit 20B in “that portion of the Chena River downstream from its confluence with the Little Chena River,” presumably due to relatively high population density in this region relative to other areas of Unit 20B. There is a very high density of active beaver lodges in this area, and consequently, a significant amount of damage caused by beavers. This proposal opens up trapping opportunities while minimizing potential for conflict with other recreational users of the Chena River.

**PROPOSED BY:** Stephen Meyers

(EG-F23-165)

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# **Antlerless Moose & Brown Bear Tag Fee Reauthorizations for Other Regions**

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## **PROPOSAL 189**

### **5 AAC 92.015. Brown bear tag fee exemption.**

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

#### **5AAC 92.015. Brown bear tag fee exemption**

(a) A resident tag is not required for taking a brown bear in the following units:

- (1) Unit 11;
- (2) Units 13 and 16(A);
- (3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

- (A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;
- (B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;
- (C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;
- (D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- (1) Unit 9(B);
- (2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);
- (3) Unit 17;

...

**What is the issue you would like the board to address and why?** Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 and are managed

primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The liberalized bear seasons and bag limits adopted along with the elimination of the tag fee were intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-040)

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## **PROPOSAL 190**

### **5 AAC 92.015. Brown bear tag fee exemptions.**

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

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units... 26;

...

(8) Unit 22;

(9) Unit 23;

...

(13) Unit 18;

...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

...

(4) Unit 18;

...

(7) Unit 22;

(8) Unit 23;

...

(10) Unit 26(A).

**What is the issue you would like the board to address and why?** The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. The department recommends continuing resident tag fee exemptions for the general season and subsistence season hunts in Region V (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 10 years; Unit 22, where the tag fee has been exempted for 20 years; Unit 23, where the tag fee has been

exempted for 15 years; and Unit 26A, where the tag fee has been exempted for 10 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for RY2012 and harvest has remained within sustained yield and continues to be similar to the preceding ten-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements include: 1) registration permit, 2) tag fee exemption, 3) salvaging meat for human consumption, 4) no use of aircraft in Units 22, 23 and 26A, 5) no sealing requirement unless hide and skull are removed from subsistence hunt area, and 6) if sealing is required, the skin of the head and front claws must be removed and retained by ADFG at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADFG for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, we estimate zero to three bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging less than one bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest is less than five bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between zero and five bears are taken annually by subsistence hunters.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-068)  
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## **PROPOSAL 191**

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

Reauthorize the antlerless moose season in Unit 6C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		

1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued	Sept. 1-Oct. 31 (General hunt only)	No open season.
--	--	-----------------

or

1 moose by registration permit only;	Nov. 1-Dec. 31	No open season.
--------------------------------------	----------------	-----------------

...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The department recommends reauthorizing the state antlerless hunt in Unit 6C to achieve the harvest objectives when the federal subsistence hunt is not able to achieve the desired level of harvest.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. Because the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, we have not held the antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as indented if it is needed. Continuation of the antlerless hunts may be necessary to manage population growth and keep it within the limits of what the habitat can support.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-033)

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## **PROPOSAL 192**

### **5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13A as follows:

<b>Units and Bag Limits (11)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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Unit 13  
1 moose per regulatory year,  
only as follows:

...

1 antlerless moose by drawing permit only in Unit 13(A); up to 200 permits may	Oct. 1–Oct. 31 Mar. 1–Mar. 31 (General hunt only)	No open season
--	---	----------------

be issued; a person may not  
take a calf or a cow  
accompanied by a calf; or  
...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

This Unit 13 antlerless hunt was initially adopted in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. The hunt was modified when the Board of Game adopted an October and March season during the February 2013 board meeting.

Since the inception of this hunt, the department has issued 10 permits annually for a hunt in Unit 13A. The department intentionally limited the number of permits issued annually to gain public support for the hunt, even though a higher rate of cow harvest was desirable to regulate the moose population within objectives. After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to one percent of the cow population, when the moose population is above the midpoint of the population objective for the subunit. Twenty-five permits were issued for regulatory year (RY) RY2021 and 25 permits were issued for RY22.

The current population objective for Unit 13A is 3,500–4,200, and the population was estimated to be above objective in 2015 and 2016, within the higher end of the objectives in 2017–2021. In 2022 the Unit 13A moose population was estimated to be above the objectives at 3,621, and the 3-year average remains just within the higher end of the objectives. The antlerless hunt in western Unit 13A contributes to maintaining the moose population within the intensive management objectives. The additional harvest provided through this hunt will also assist in achieving the harvest objectives for the population.

If antlerless moose hunting opportunities are not reauthorized in Unit 13A, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-064)

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## **PROPOSAL 193**

### **5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13C as follows:

<b>Units and Bag Limits (11)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 13 1 moose per regulatory year, only as follows:  ...		
1 antlerless moose by drawing permit only in Unit 13(C); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or  ...	Oct. 1–Oct. 31 (General hunt only)	No open season

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

Unit 13 has an active intensive management program, designed to increase moose abundance to within objectives, and increase available harvest for humans. Since the early 2000s, moose abundance in most subunits has increased until recent years when many subunits have peaked and/or stabilized at, above, or within abundance objectives.

As moose populations approach carrying capacity, the population becomes less productive, and may eventually decline. Stabilizing a population below carrying capacity allows it to remain highly productive if additional moose are removed annually. This requires harvest of both cows and bulls. The Intensive Management abundance objectives for moose in Unit 13 are designed to maintain moose populations in Unit 13 subunits below carrying capacity, at a more productive level. Unit 13C has reached abundance levels for which cow harvest is necessary to stabilize the population at a more productive level and allow for human harvest of excess moose. In recent years the bull-to-cow ratio in Unit 13C averages just below the objective of 25 bulls per 100 cows, suggesting that there are not additional bulls available for harvest at this time. Harvest of up to 1% of the estimated cow moose population in Unit 13C would allow for roughly 23 cow moose to be harvested annually in recent years.

Harvest objectives for Unit 13C are 155–350 moose, but those objectives have not been met since 1995, when 154 moose were harvested, and 1996, when 169 moose were harvested. The only other years when harvest exceeded 150 moose were in 1989 (154 harvested), and 1988 (199 harvested), which was the most

moose ever reported harvested in a single year in Unit 13C. As moose abundance in Unit 13C increased above objectives in recent years, harvest peaked at 117 moose in 2014. Evidence suggests that the current moose harvest objectives for Unit 13C may not be attainable due primarily to accessibility. Harvest of excess cow moose to stabilize the Unit 13C population will increase overall harvest and provide additional opportunity for hunters to harvest cows as well as additional bulls. The department plans on providing five resident antlerless permits in Unit 13C for RY23.

If antlerless moose hunting opportunities are not reauthorized in Unit 13C, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-065)

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## **PROPOSAL 194**

### **5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13E as follows:

<b>Units and Bag Limits (11)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 13 1 moose per regulatory year, only as follows:  ...		
1 antlerless moose by drawing permit only in Unit 13(E); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or  ...	Oct. 1–Oct. 31 (General hunt only)	No open season

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

Unit 13 has an active intensive management program, designed to increase moose abundance to within objectives, and increase available harvest for humans. Since the early 2000s, moose abundance in most



subunits has increased until recent years when many subunits have peaked and/or stabilized at, above, or within abundance objectives. As moose populations approach carrying capacity, the population becomes less productive, and may eventually decline. Stabilizing a population below carrying capacity allows it to remain highly productive if additional moose are removed annually. This requires harvest of both cows and bulls. The Intensive Management abundance objectives for moose in Unit 13 are designed to maintain moose populations in Unit 13 subunits below carrying capacity, at a more productive level. Unit 13E has reached abundance levels for which cow harvest is necessary to stabilize the population at a more productive level and allow for human harvest of excess moose.

The moose abundance index indicated fewer than 4,000 moose in Unit 13E in 2000 but the population has been increasing since then and the current abundance is well above the abundance objectives of 5,000 to 6,000 moose. Harvest levels increased with the increase in abundance, but harvest levels remain below the harvest objectives of 300 to 600 moose. Bull-to-cow ratios are at the objective of 25 bulls to 100 cows. Additional harvest has been requested by the public for Unit 13E but cannot be obtained without harvesting cow moose. Cow moose harvest opportunity will provide for the reduction of moose abundance to within objectives before the population becomes nutritionally stressed and experiences a decline due to nutritional constraints. The department plans to provide five resident antlerless moose permits in Unit 13E for RY23.

If antlerless moose hunting opportunities are not reauthorized in Unit 13E, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-066)

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## **PROPOSAL 195**

### **5 AAC 85.045(a)(12). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose draw permits in Units 14A and 14B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
Unit 14(A) 1 moose per regulatory year, only as follows:  ...		
1 antlerless moose by drawing permit only; up to 2,000 antlerless moose permits may be issued; or	Aug. 20–Sept. 25 (General hunt only)	No open season
1 moose by targeted permit only; by crossbow, shotgun or bow and arrow only; up to 200 permits may be issued	Nov. 1–Dec. 25 (General hunt only) Winter season to be announced (General hunt only)	No open season
Unit 14(B)  1 moose per regulatory year, only as follows: ...		
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued.	Winter season to be announced (General hunt only)	No open season

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. There are two types of antlerless moose hunts in the Matanuska-Susitna Valley – a drawing permit hunt used to regulate growth of the moose population in Unit 14A, and targeted hunts used to mitigate public safety concerns in Units 14A and 14B.

Moose surveys conducted in November 2020 yielded an estimate of 7,112 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2019 survey estimate of 7,900 moose indicating that the increased antlerless harvests are having the desired effect of

reducing the population. A sex and age composition survey in 2021 demonstrated a bull ratio of 28 bulls:100 cows and a calf ratio of 35 calves:100 cows.

Antlerless moose hunts have been authorized in Unit 14A since 2001 in order to regulate the growth of the population. The permit level was increased from 450 to 1,000 in 2013 to account for the continued increase in the population and again in spring 2018 from 1,000 to 2,000. Continued increased harvest based on the increased permit levels is expected to bring the population back to within the objective for the unit of 6,000–6,500.

The current increases in the harvest have seemingly slowed the population growth; however, it has not reduced the moose population to within objectives. An increase the number of moose-human conflicts is anticipated as the moose density increases, and moose may experience nutritional stress as the population nears carrying capacity. Cow harvests are warranted to control the moose population's growth and recommended to provide additional moose hunting opportunity in the Matanuska-Susitna Valley.

The targeted moose hunts in Units 14A and 14B are an effective tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 316 moose per year were killed in the Matanuska-Susitna Valley area during the last five years of average snowfall and substantially more are killed during higher snowfall years. ADFG also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-038)

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## **PROPOSAL 196**

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

Reauthorize the antlerless moose seasons in Unit 14C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		
Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloading black powder rifle only; up to 50 permits may be issued		
Unit 14(C), that portion of the Ship Creek drainage upstream of the Joint Base Elmendorf-Richardson (JBER) Management Area		
1 moose by drawing permit only; up to 50 permits may	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30

be issued; or

1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
...		
Remainder of Unit 14(C)		
1 moose per regulatory year, only as follows:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
1 bull by drawing permit only, by bow and arrow only; up to 10 permits may be issued	Oct. 20—Nov. 15	No open season
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually, and the department recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population level, which has been demonstrated to reduce over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and significant mortality events during severe winters. These hunts have also been successful in providing additional moose hunting opportunities in the state's human population center with little controversy.

The number of antlerless permits issued depends on the current population level and bull:cow ratios, as well as estimated winter mortality. A combined 2021 aerial composition count of the Joint Base Elmendorf-Richardson (JBER) Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14C) found 301 moose with a bull:cow ratio of 44 bulls per 100 cows and a calf:cow ratio of 20 calves per 100 cows. In 2020, a survey of the same area found a total of 242 moose with bull:cow and calf:cow ratios of 30:100 and 25:100, respectively. Compared to the 2013 survey, which found 225 moose with a bull:cow ratio of 39 bulls per 100 cows and a calf:cow ratio of 20 calves per 100 cows, little change has occurred. In addition, harvest numbers have remained relatively steady, indicating that the population level has likely not changed dramatically. At this population level, we have received fewer reports of human-moose conflicts and of winter mortalities. Harvesting cow moose is paramount to maintaining the population at lower levels while providing harvest opportunity.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-036)

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**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 as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(5) ... Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage		
RESIDENT HUNTERS:		
1 moose by drawing permit only; up to 60 permits for bulls will be issued in combination with nonresident hunts, and up to 70 permits for antlerless moose will be issued	Aug. 20—Oct. 10 (General hunt only)	
NONRESIDENT HUNTERS:		
1 bull by drawing permit only; up to 60 permits for bulls will be issued in combination with resident hunts		Aug. 20—Oct. 10
...		

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

to the December 2020 count, which found 153 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 14 calves per 100 cows, and the December 2016 count which found 153 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 18 calves per 100 cows.

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

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-035)  
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**PROPOSAL 198**

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

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(13)		
...		
Unit 15(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 20	Aug. 20—Sept. 20
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective.

In response to concerns that the moose population on Kalgin Island had exceeded the island’s carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective.

During the most recent moose survey, department staff counted 90 moose on Kalgin Island in December 2022. This count is larger than the population objective of 20–40 moose. In the last 10 years, an average of 118 permits were issued for this hunt; of which 89 permittees hunted, with an annual average harvest of 30 moose.

The any moose registration hunt is recommended to provide liberal harvest opportunity on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make over-harvest unlikely.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-034)  
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**PROPOSAL 199**

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

Reauthorize the antlerless moose seasons in Unit 15C as follows:

This proposal would reauthorize the antlerless moose hunt for the Homer bench (DM549) and the targeted hunt (AM550).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; the taking of calves, and females accompa- nied by calves, is prohibited; up to 100 permits may be issued in combination with the nonresident drawing hunt: or	Oct. 20—Nov. 20	
...		
1 moose by targeted permit only[,]	Oct. 15—Mar. 31	
NONRESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; the taking of		Oct. 20—Nov. 20



calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the resident drawing hunt

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only[,] Oct. 15—Mar. 31

**What is the issue you would like the board to address and why?** Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorization of the Homer bench hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in 15C for the 2023-24 hunting season.

In February 2023, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay). Analyses of this data to account for high degree of spatial variability in winter density is in process. Preliminary data indicates the population is within or above Intensive Management Population Objective for this GMU. Fall composition counts in core count areas during December 2022 provided a bull ratio of 34 bulls:100 cows.

The Homer bench land in Unit 15C, which encompasses the hunt boundary of DM549, contains high densities of moose when deep snow drives moose into human populated areas. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 25 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 63 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-037)

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## **PROPOSAL 200**

### **5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(15)		
Unit 17(A)		
Up to 2 moose per regulatory year only as follows:		
RESIDENT HUNTERS:		
1 moose by registration permit only; or	Aug. 25–Sept. 25 (Subsistence hunt only)	
1 antlered bull by registration permit; during the period Dec. 1 –Last day of Feb. a season of up to 31 days may be announced by emergency order; or	Winter Season to be Announced by Emergency Order (Subsistence hunt only)	
1 antlerless moose by registration permit; during the period Dec. 1 –Last day of Feb. a season of up to 31 days may be announced by emergency order;	Winter Season to be Announced by Emergency Order (Subsistence hunt only)	
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth; help to meet Intensive Management (IM) objectives for high levels of harvest; and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The board adopted an antlerless moose hunt in 2013 after hearing comments from heavily invested groups such as the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, and the Togiak National Wildlife Refuge.

The Unit 17A moose management plan calls for antlerless moose hunting opportunity when the population is above 600 moose and increasing. When the population exceeds 1,200 moose, a bag limit of up to two moose is needed to provide increased opportunity and to reduce moose abundance to protect habitat. Based on the most recent survey, conducted under good conditions, in March 2017, both conditions have been

met with a raw data population estimate of 1,990  $\pm$  437 moose. After further analyses, this estimate will be corrected for sightability which will result in a higher population estimate further supporting liberal harvest strategies. The bag limit of two moose and antlerless harvest opportunity provides a mechanism to limit population growth and allows hunters to harvest surplus animals.

The moose population in subunit 17A is growing and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F23-039)

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## **Proposals Outside the Board of Game's Authority**

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The Board of Game does not have authority to adopt the requested changes in the following proposals. They are included in the book for review, comments, and discussions at the applicable board meeting.

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*Alaska Statute 16.05.407 requires a nonresident brown bear hunter to be accompanied by a guide.*

### **PROPOSAL 201**

As an emergency declaration I propose allowing non-residents to kill a grizzly on an over the counter permit without the requirement of a guide. This proposal would remain in effect until the Grizzly population is adjusted to meet the Department of Fish and Game's population goal.

It is my belief this time sensitive emergency declaration (regulation) change would more expeditiously address the grizzly over population existing in Unit 19C with the increase of moose numbers and increase in age class of both cows and bulls.

**What is the issue you would like the board to address and why?** Predation Control in Unit 19C; Unit 19C has a major bear and wolf predation problem that is affecting the numbers and age class of moose. As a nonresident I encounter five to ten grizzlies in Unit 19C on every moose hunt for the past 20+ years. I have had multiple issues prior to harvesting a bull along with issues while skinning and while the meat is hanging. Additionally, Without drastic measures to reduce the predation issues; the moose population will decline appreciatively with irreparable harm to the herd.

**PROPOSED BY:** Les Butters

(EG-F23-176)

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*Nonresident license and tag requirements and fees are set in Alaska Statute.*

### **PROPOSAL 202**

If we can make it attractive to nonresidents, I think we can really help get the bear population down or at least help get the numbers to a sustainable level. To make it attractive to nonresidents since they are the number one in hunting and harvesting bears, I propose a non resident purchase two things.

A. A hunting license.

B. A Bear permit for (\$500) Allowing a non-resident to harvest up to 5 black bears on that permit.

In my opinion based on what I have seen this would make it attractive for nonresidents to want to come to Alaska (specifically 19E) to hunt bears in compared to hunting other areas of the world. If we wish to help out the moose population this is probable a really great place to start.

**What is the issue you would like the board to address and why?** Nonresident black bear tag cost.

It's no secret that Unit 19E has an abundance of bears. It's no secret that the bears that are there are really doing a number on moose calves. Currently as it is a nonresident can harvest up to five black bears in Unit 19E. Over the years we have noticed a couple things in regard to this.

1. If a hunter wants to hunt black bears and has a choice to make as to where he wants to hunt he has lots of options. Alaska and unit 19E usually does not come to the top of that list due to a couple of factors.

a. A hunter can spend a lot less and go somewhere else to harvest bigger black bears.

b. Unit 19E is not known for any really big bears.

c. Benefits of going elsewhere outweigh coming to 19E.

2. If we are lucky enough to get a hunter committed to come, they usually only purchase one tag. They do and have had plenty of opportunity to harvest multiple bears however financially they could only afford harvest one.

3. We have never seen a resident hunting bears in our area so the only populous to help in thinning out the Bear population to help the moose population is nonresidents.

**PROPOSED BY:** Dan Paull

(EG-F23-197)

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*Wildlife population monitoring is an authority of the Department of Fish and Game.*

#### **PROPOSAL 203**

Monitor predator populations carefully and implement more aggressive controls when populations increase beyond a balanced level.

**What is the issue you would like the board to address and why?** Predator population need to be better managed. It seems the wolf population grows fast when game population increases. Once the wolves have done their damage, game populations take much longer to recover.

**PROPOSED BY:** Alan Horstman

(EG-F23-169)

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*The Board of Game cannot discriminate between Alaskan subsistence hunters based on rural residence.*

#### **PROPOSAL 204**

Make all Unit 23 moose hunts for non-federally qualified subsistence users, archery only.

Unit 23 (all currently only areas for moose)

RM880: One antlered bull by permit available in person at license vendors within Unit 23 August 1-December 31 except **by Bow and Arrow Only for NON-federally qualified subsistence users.**

HT: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side except **by Bow and Arrow Only for NON-federally qualified subsistence users**

**What is the issue you would like the board to address and why?** The purpose of this proposal is to maintain (or regain) moose hunting opportunity in unit 23, (where an emergency closure was recently enacted to decrease harvest) by utilizing archery as a conservation tool to decrease harvest without decreasing total opportunity for hunters.

In April of 2022 the Federal Subsistence Board approved WSA21-01b to close moose hunting to non-Federally qualified subsistence users on Federal public lands in Unit 23. The Subsistence Board stated the closure in Unit 23 provides more subsistence harvest opportunity (by removing the non-subsistence harvest) and is necessary to conserve the moose population, which they state, has declined substantially; and in their words “the harvestable surplus may also be exceeded”. In the ADFG memorandum response to the closure they showed that through 2020, the moose harvest numbers that did not exceed the harvest objective (average harvest of around 110-150 moose with objective harvest higher than that and allowable surplus of over 300 moose) but local resident hunters and local biologists have expressed concern about decreased moose populations in that area since the 2020 season. There is also concern that because the western arctic caribou herd (WCHA) has decreased in recent years and because of changing migration patterns, local hunters who traditionally relied on caribou, have been pushed to hunt moose more frequently. Because of these concerns (emergency closure for non-qualified subsistence users due to population concerns) we should make efforts to decrease harvest in this area by non-federally qualified subsistence users. By transitioning the hunt for non-subsistence users to archery only, opportunity for anyone who wants to hunt will be preserved but due to the more limited shooting range of archery equipment, the harvest will be decreased.

This would maintain opportunity while decreasing the harvest by non-federally qualified hunters in the context of widespread concern for adequate moose numbers in this area.

\*\*\*Of note, in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and layering to shoot a bow. Currently it’s possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks.

**PROPOSED BY:** Paul Forward

(EG-F23-284)

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*The permit application process is an administrative authority exercised by the Department of Fish and Game.*

## **PROPOSAL 205**

I would ask the boards at large and ADF&G as a whole to consider a change to this practice. For instance, when I log onto my personal GoOutdoorsIdaho page when I apply for permits in Idaho, I can readily see whether I won or did not win a permit. To my knowledge, my personal results are not published elsewhere for others to see. I would ask for the same level of privacy, in my home State of Alaska.

**What is the issue you would like the board to address and why?** I would ask the state/board to consider the privacy, in an increasingly competitive hunting environment, of winners of drawing permits in Alaska. I vehemently disagree with publishing in a publicly accessible format, the names of the winners of these permits. There are several, readily identifiable privacy issues with the practice of publishing (online or elsewhere) the names of permit winners.

**PROPOSED BY:** Donald Harold Lee III

(EG-F23-228)

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*The Board of Game does not have authority to regulate guides.*

**PROPOSAL 206**

If such has not already been done, I would ask the boards/ADFG, using science/data on carrying capacity and past harvest and perhaps aerial survey of GUAs to cap the numbers of sheep and moose that can be taken by a guide within their GUA for all GUAs in Alaska. I believe this has been done on a limited basis for certain areas but am unsure. I would ask that this be the practice statewide.

**What is the issue you would like the board to address and why?** Certain guiding operations within the state of Alaska are well known to overharvest their areas to the detriment of hunting quality, species quality and the population health of the given species within those areas. While this has been looked at in a round about manner with the push from some quarters for Guide Concession Programs, limiting the numbers of guides in Alaska or placing more limits on non-resident opportunity, I feel that much opportunity remains to create/protect robust game populations and to create better opportunity for resident hunters. Sheep, I believe are particularly vulnerable to overharvest. While we would like to believe that guides will self regulate their take within their GUAs, this is not always the case.

**PROPOSED BY:** Donald Harold Lee III

(EG-F23-231)

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