

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

---

### **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)

\*\*\*\*\*

### **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)  
 \*\*\*\*\*

## **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)  
 \*\*\*\*\*

## **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)

\*\*\*\*\*

### **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*



## **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)

\*\*\*\*\*

## **PROPOSAL 60**

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

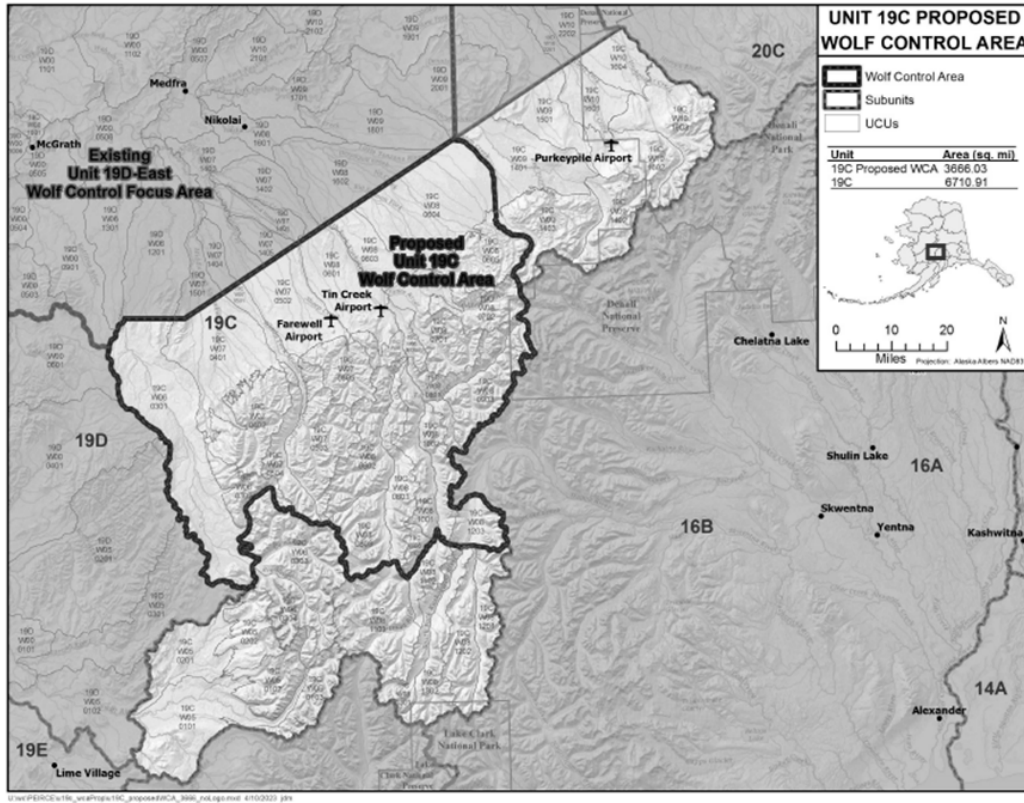
Allow aerial wolf control in a portion of Unit 19C as follows:

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)  
 \*\*\*\*\*

## **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)  
 \*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*



**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.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
----------------------	---	----------------------------

(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.
---	--------------------------

...

**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)  
\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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>
-----------------------------	---	------------------------------------

(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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

### **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

**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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

### **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)

\*\*\*\*\*



## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

#### **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)

\*\*\*\*\*

### **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)

\*\*\*\*\*



## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

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

---

### **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)

\*\*\*\*\*

*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)

\*\*\*\*\*

### **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)  
\*\*\*\*\*

**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)

\*\*\*\*\*



## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

### **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*

## **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)

\*\*\*\*\*