



Submitted By  
Eric Menck  
Submitted On  
1/21/2018 3:05:18 PM  
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Please vote in favor of proposal 92 to repeal the community subsistence/harvest hunt in unit 13/copper river basin for moose and caribou. These hunts go against the constitution of the state of Alaska which mandates equal use/opportunity for ALL Alaska residents, not just a select few!! Vote for the repeal to be effective immediately for the 2018 /2019 Hunting season! Thank you, Eric Menck Thank you



Submitted By  
Adam Messmer  
Submitted On  
2/2/2018 8:51:29 AM  
Affiliation

I support proposal #128 to remove the restrictions on bull caribou in Unit 10, Adak Island. The intent of the proposal was **not** to remove any reporting requirements.

Adam Messmer



Submitted By  
Dan Montgomery  
Submitted On  
2/2/2018 4:14:32 PM  
Affiliation

I,m a 36 year resident of Alaska and have lived, hunted and guided in region 4 for the last 25 years.

I oppose the following proposals: 74, 75, 86, 87, 88, 107, 110, 131, 132, 133, and 148.

I support the following proposals: 79, 80, 90, 92, 93, 95, 102, 109, 111, 139, 141, 147, 1nd 149.

I strongly oppose proposal 133. It has no basis on conservation and is very self-serving to the proposer. There is no harvest data that suggests that the bears are being over harvested in this area. I have guided in this area since 1997 and have seen a lot of changes over the years and there has been a dramatic drop in harvest and participation in the last 6 years. In my opinion we had a bear die off in the winter of 2011/12 where we lost most of our young bears. The two younger bears we harvested in the fall of 2011 were thin with very little fat on them. I believe this very long, cold winter killed them. There was also a very high incidence of bear problems in the villages that summer and fall with a large number of bears being killed in defense of life and property. That is a indication of stess in the population. We saw very few sows with cubs and hardly any young bears in the fall of 2013, which alarmed us. We have personally cut the number of clients we take in half since 2013 and urge other guides to do the same until there is a recovery in the bear population. This will dramatically reduce any crowding issues. We saw some rebound in the number of sows with cubs and young bears observed in the fall of 2017. The ADF&G comment about shorting the seasons is a good idea in my opinion and I would recommend that they return to thier old dates of Fall seasons from October 7th to October 21st and Spring seasons from May 10th to Mat 25th. The Dept. and board needs to strongly recommend to avoid the harvest of sows to all hunters.

Thank you for this opportunity to comment.

Respectfully yours;

Dan Montgomery



Submitted By  
Benjamin R Moyer Sr.  
Submitted On  
1/22/2018 10:40:30 AM  
Affiliation

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I support Proposal 92-AAC 85.025 and 85.045 and 92.072. I have been hunting in Unit 13 since 1968 and have seen too many changes in access being closed off to hunting state lands and regulations that are limiting the rights of all residents to hunt in this unit. All game in this state belongs to all residents and all residents have the rights to hunt and harvest these resources. We deserve to be treated equally and fairly and all residents should be hunting under the same rules and regulations. Thank You, Benjamin Moyer SR.



Submitted By  
Tim Nelson  
Submitted On  
1/19/2018 10:59:31 AM  
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As lifelong trapper and resident of unit 11 **I fully support proposal 115.**

The short wolverine season has caused a lot of frustration for all trappers in units 11 and 13 because wolverine are caught in the same sets as Lynx and it is virtually impossible to target one and not the other. Aligning the seasons just makes sense.



## Pilot Point Tribal Council

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2200 Main Street  
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Pilot Point, Alaska 99649

Telephone (907) 797-2208  
Fax (907) 797-2258

September 14, 2017

ADF&G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526  
Juneau, AK 99811 – 5526

Re: PROPOSAL 125 – 5AAC 85.025. / OPPOSE

To: The Alaska Board of Game

The Pilot Point Tribal Council at a meeting held on September 13<sup>th</sup> unanimously agreed that we oppose proposal 125.

We do not feel changing the hunting season dates is in the best interest of our residents. By the end of September the caribou are in rut and not edible, we prefer the earlier dates of August 10<sup>th</sup> to September 20<sup>th</sup> for that reason. The proposed dates would put more pressure on hunters to only take female caribou. This is not acceptable as our herd is still rebounding from previous low numbers.

When Caribou were abundant (Prior to Tier II), the migration patterns were perfect for the current hunting season dates. Since the herd is still not back to the size it was, we do not want to change anything in hopes that the migration patterns will return. The migration is not a problem it is just that there are less caribou.

Thank you for your time and consideration of our comments.

Sincerely,

Victor Seybert, President  
Pilot Point Tribal Council



Submitted By  
Gina Poths  
Submitted On  
2/1/2018 11:13:50 PM  
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Based on the information I have read regarding the proposal to provide Ahtna Alaska Natives priority harvest of moose and caribou in the Nelchina Basin (GMU 13, 11 parts of 12) I would like to give my support to Proposal 92.

The Alaska State Constitution does not provide for a 'requirement' to provide any user group with a priority harvest of publicly owned game when abundant harvest is available.

My issue with giving any specific user group priority provisions clearly keeps the lines drawn between ethnicity and race. It is unacceptable to provide one race benefits not available to others. We are never going to live in a day where everyone is treated equal when there are still user groups asking for unique benefits based on their race, ethnicity, religion etc.

I believe the provisions provided in Proposal 92 to be discussed today at the Dillingham BOC meeting is fair to all user groups.

Thank you,

Gina Poths



Submitted By  
James Prichard  
Submitted On  
1/21/2018 6:15:28 AM  
Affiliation

Proposal 92: All hunters should be treated equally. If someone qualifies for subsistence, then those persons should be treated like others who qualify for subsistence. Natives should not be given a higher status for hunting than the rest of the hunters. Doing so opens up a Pandora's box. Who qualifies as a Native? Someone who is 1/2, 1/4, 1/8, etc? How does one prove they're a Native. By singling out one group, the cost of issuing permits will rise and residents will end up paying the price. The Natives have reasonable opportunity now. As the saying goes "if it ain't broke, don't fix it".



Submitted By  
Gregory Rodgers  
Submitted On  
1/21/2018 7:29:55 PM  
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I wish to add my enthusiastic support for Proposal #92.



Submitted By  
theresa rodgers  
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1/21/2018 3:37:39 PM  
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Dear Mr. Spraker, I am writing in support of Proposal 92 concerning moose and caribou in unit 13. The community subsistence harvest program is broken and unnecessary given the abundance of federal subsistence opportunities available in the area and the 1.7 million acres of private Ahtna land that is hunted without regard to management for a sustainable future. Please consider that these resources belong to all state residents and not special populations, regardless of politics. Thank you, Theresa Rodgers



Submitted By  
Danny Rosenkrans  
Submitted On  
10/30/2017 6:03:26 AM  
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I am in support of proposals #118 and/or #117. I have encountered numerous small parties of hunters in August and September along the McCarthy Road. The birds congregate along the road in August which is during the tourist season. Grouse are shot on, across and along the road which is dangerous and poses a risk to tourists and adversely affects their park experience. More importantly the current harvest limits significantly reduce the opportunities for local residents, affect the ecosystem natural balances and do not appear to be sustainable for the long-term given the current level and increase in hunting pressure.



Corey Schwanke  
PO Box 612  
Glennallen, AK 99588  
907 822 3421

I do not support proposals 113, 114 and 115 as written (lengthening the wolverine season in GMU 13). I would support a modified version of the proposals if subunits 13A, 13B and 13E were omitted. GMU 13 is 23,361 square miles, and the subunits are distinct enough to warrant different management strategies wolverine.

I've been trapping wolverine for 20 years, have read most scientific literature on them, and have written several articles about them in the Alaska Trapper Magazine as well as given presentations about trapping them. This testimony will consist of two parts: a very brief summary of scientific literature and how I think it relates to Unit 11 and 13, and then my personal experiences trapping in GMU 11 and 13.

All the literature suggests that refugia is paramount in the management of wolverine, wolverine need to be harvested at low levels, and that trapping during the denning season can be detrimental. This proposal goes against all of these concerns for much of the GMU 13.

**Refugia-** Unit 13 has plenty of trappers but due to its extensive size, refugia exists in parts of GMU 13. One important reason this refugia exists is because of conservative season lengths. The current wolverine season ends on January 31, and this regulation effectively ensures refugia because it self-regulates snowmachine and airplane access deep in the unit where the refugia currently is (certainly for Subunits 13A, B and E). Snowmachine and airplane travel is much easier in February than in November, December and January due to a combination of better snow conditions, better ice on the rivers and lakes, and more daylight. Extending the season will provide opportunity for trappers to penetrate the refugia.

**Harvest Trends-** In the absence of known wolverine population levels (especially in the trapped areas), basic harvest numbers are a key ingredient in the management process. Harvest numbers have increased the last decade. Extending the wolverine season during a time of increased harvest goes against conservative management. It is reasonable to believe there are more wolverine in the GMU13 than there was 15 years ago. Intensive management of wolves, a caribou herd above the population objective level, and all the thousands of ungulate remains left by hunters probably had a positive correlation with wolverine abundances. The unfortunate part is this information is merely speculation, and even if the wolverine population has ballooned a bit recently, one can argue that it may be temporary as wolf numbers increase and ADF&G/mother nature regain control of the caribou herd. Increasing harvest rates on a temporarily boosted wolverine population would likely create sustainability issues in the future.

**Denning-** Wolverine begin the denning process in February. Trapping into the denning season in a heavily trapped unit with increasing harvest rates is not a conservative approach preached in the scientific literature. Wolverine become more vulnerable during the denning season as females seek



denning habitat. Access to denning areas also becomes much easier in February as daylight and snow conditions improve.

Now for my personal experience portion of the testimony. I have trapped wolverine in 14C, 13D, 13B and 11. The bulk of my knowledge has come from trapping the heart of 13B. I can tell you, a lot has changed in 13B the last 15 years. When my wife and I first started trapping in 13B in 2003, overall harvest numbers were low. There were no trappers close to where we chose to trap and we had instant success. We initially trapped three consecutive years with decreasing catch rates those three years. We decided on a more conservative harvest approach and started trapping every other year. Our mean annual harvest increased substantially and we started doing quite well. Things unfortunately changed for us the last five years. More trappers started working adjacent areas (what we always considered core refugia) and our catch rates dropped significantly. Our catch rates have plummeted to near zero since then. I do not expect the Board to react based on my personal experiences alone in this single area, but I think my observations are significant for subunit 13B. We trap near the geometric center of subunit 13B and we now have trappers on all sides of us in the subunit. Trapper distribution is now widespread and there is little refugia left in subunit 13B. I suspect the mean annual harvest the last 5 years has approached, or exceeded sustainability. Extending the season another month and allowing people to trap during the onset of denning is very risky. Even though Subunit 13E is over twice as large as 13B, similar issues exist there. A large chunk of traditional refugia is now being trapped, and like 13B, it has a road transecting it which allows for easy access in the subunit's best wolverine habitat. Subunit 13A has plenty of people trapping it and extending the season is not warranted there either. There is certainly some refugia on the NW corner of subunit 13A and SE corner of 13E, but as I stated earlier, extending the season into the February when conditions are much better for traveling, and when wolverine start moving more might jeopardize these areas.

My experience and knowledge of wolverine trapping and trapper distribution suggests that extending the wolverine season in Subunits 13C, 13D and GMU 11 would provide for sustainable harvests. Early access to these areas is often constrained because of high gradient rivers and large lakes which do not freeze until well after trapping season begins. These areas are also difficult to access due to general remoteness. GMU 13 is over 23,000 square miles (the size of 6.5 Kodiak Islands), with one corner butting up to the most major metropolitan area of the state, and the other corners butting up to near nothing in the terms of population centers. If the Department and the Board of Game are inclined, now might be a good time to institute different seasons at the subunit level.

Corey Schwanke



Submitted By  
Rebecca Schwanke  
Submitted On  
2/2/2018 10:24:00 AM  
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Proposal 93 – I still support the concept of eliminating the community subsistence harvest caribou hunt in Unit 13. This hunt is unnecessary. There is ample subsistence opportunity offered under the Tier I registration hunt.

To improve the Tier I hunt, I would like to see hunters spread out into different hunt periods. Given the high numbers of caribou at this time, it might also help to extend the season, starting Aug. 1 and increase the bag limit to 2. Caribou are generally difficult to access Aug. 1 through Aug. 15, so this wouldn't have a huge effect except offering additional hunting opportunity for hunters that wanted to put in the extra effort.

Three possible fall hunt periods could run Aug. 1 to 15, Aug. 17 to 31, and Sept. 1 to 20. Tier I hunters would be able to sign up for one hunt period at a time, and permit numbers would be limited to 3000 permits (less in years of low caribou numbers, as determined by the Department). The winter season could run as a separate hunt period or hunt Oct. 21 to March 31.

With allowing hunters to proxy for up to two Unit 13 caribou per regulatory year, people would be able to help out neighbors, elders and friends that need it.

Proposal 96 – I still support the concept of eliminating the community subsistence harvest moose hunt in Unit 13, 11, and a portion of 12. This subsistence hunt does not reflect traditional harvest patterns of moose in this area. The longer seasons and pull of an any bull hunt has brought so many new hunters to Unit 13, now every participant believes they're a subsistence hunter here. This is unfortunate.

Please reassess whether a special subsistence moose hunt is even necessary in Unit 13 in particular. The moose population has increased substantially, general harvest is up. Combined with federal harvest in this area, the total take of moose well exceeds ANS.

I still support a registration hunt with a unique bag limit, one bull per household with antlers less than 50-inches wide, and at least two brow tines on both sides. Permit numbers should be set by the Department and offered on a first come first serve basis. This bag limit would help combat the constant pressure on the population from the general season bag limit 50-inches, 4BT.

If this is not an acceptable hunt option, please consider that the general hunt meets subsistence needs.

Given the increase in moose numbers across Unit 13 due to Intensive Management, it is conceivable at this time to consider a longer general season for those areas with bull:cow ratios above objective 13B, 13C, 13D, and 13E.

Harvest success increases significantly towards the end of September due to rutting behavior. Due to this, in the past I have not supported extending the moose hunt in Unit 13 to September 25th, instead I generally prefer an extension on the beginning of the season, adding 10 days at the end of August. At this time, given the pressure the moose population has received from the CSH hunt and increased general hunt numbers, I believe an extension either into August or later in September would be sustainable for 13B, 13, 13D, and 13E.

Proposals 113, 114, and 115 – Lengthening the wolverine trapping season across Unit 13 would likely result in lower wolverine populations in a few short years. Wolverine habitat spreads across the high country in this unit. The Denali Highway cuts through prime wolverine habitat in 13B and 13E, offering substantial access to important wolverine habitat. These animals are reclusive and slow to reproduce. Current trapping through Nov, Dec, and January offers ample opportunity to catch these highly valued furbearers. It's cold, rivers and waterways are still sometimes open, and wolverine stick to relatively small home ranges. Still, wolverine are harvested successfully across the unit, and harvest is up.

Come February daylight is longer, temperatures are warmer, and snow conditions are significantly better. Many more people would be out setting for wolverine, and success rates would climb significantly for a short period of time. Female wolverine begin to den in February and males tend to increase their home ranges during this time marking their territory and looking for food.

All wolverine literature available indicates harvest rates must be conservative, and refugia must be retained. Currently there is refugia in the core of Unit 13, but each year better snowmachines push further and further. Aircraft are also used for wolverine trapping in this unit, and can penetrate the best refugia.



There is very little data on wolverine population numbers in Unit 13, and existing data is insufficient to support a season extension unitwide at this time. Snapshot SUPE surveys must be viewed with caution, as scientific assumptions are generally broken every time. The main assumption broken regularly in these is that wolverine are always leaving tracks. Spending time in wolverine habitat teaches you quickly that hard packed snow and high winds commonly obliterate tracks on contact.

If any season extension is considered, I would suggest limiting it to 13C and 13D, units with less harvest pressure and more difficult access.



Submitted By  
Timothy Shine  
Submitted On  
1/27/2018 7:37:32 AM  
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??

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Proposal 92.072, to eliminate Community Subsistence harvest hunts in units 11,12,& 13, is long overdue. Here is why: 1) Community subsistence needs are abundantly met in these units through the forced imposition of discriminatory Federal Local Priority mechanisms. 2) Nothing in the Alaska Constitution requires the State to impose similar unfair rules. 3) The Community Harvest system is regularly abused, to the detriment of all all Alaskans not qualifying for the artificial priority. 4) The State of Alaska should manage public resources for equal opportunity during times of abundant harvest. Please do away with the grossly unfair Community Harvest System. Tim Shine



Submitted By  
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I support Proposal 92



**Sleetmute Traditional Council**  
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November 28, 2017

To: The Alaska State Board of Game

**RE: Proposal 165 - OPPOSE**

The Sleetmute Traditional Council, (STC), sent comments to the Board of Game, (BOG), opposing the acceptance of ACR 1. STC opposes Proposal 165 for the same reasons it gave then, as well those reasons given by the Stony Holitna Fish & Game Advisory Committee, (SHAC).

STC was, and is in full support of the closure that went into effect in 2006, This council, as well as those from Stony River, Red Devil, and Lime Village all sent resolutions of support to the Board of Game for that 2006 Region III BOG meeting. STC is aware that a harvestable surplus does not have to be hunted, and can be used to help build the moose herd. That is why it agreed to a closure rather than Tier II.

The ADF&G wolf and bear predator control programs have been beneficial for the increase of moose numbers. Within the Bear Control Area, tribal members have seen a noticeable increase in the moose herd, but not in the remainder of the closure area.

Certainly, members of the council and community would like to hunt, but we are concerned and anxious about how any hunt will impact the existing low moose herd numbers throughout the area. For that reason, STC fully supports the SHAC recommendations for conditions on any limited hunt that is open in future years. These recommendations were made to help provide a limited hunt, while allowing the herd to increase.

The author of Proposal 165 does not represent the people of Sleetmute or the area; SHAC does. STC is opposed to having permits issued at the author's store, and believes the council office to be a more appropriate place.

STC supports the recommendation that if a hunt is opened before the next Region III Cycle, it should not be sooner than fall of 2019. The purpose is to give another generation of cows the opportunity to calve and contribute to herd growth, before there is any hunting pressure in the area. This policy would be similar to the 5-year moratorium on moose hunting in the McGrath area, following its bear control program.

Thank you for your time and attention,

A handwritten signature in cursive script that reads "Sandra D Greger".

Sandra Greger, President, Sleetmute Traditional Council



Submitted By  
Joe Stam  
Submitted On  
1/30/2018 2:58:37 PM  
Affiliation

proposal #92 - 92-5 AAC 85.025. Hunting seasons and bag limits for caribou; 85.045. and hunting seasons and bag limits for moose; 92.072

**Repeal the current community subsistence harvest hunts for the Copper Basin Area.** Default back to the old general season moose hunt: Sept 1 through Sept 20, spike fork, four brow tines, 50 inch spread. increase the number of draw permit tags from 5 to 100 tags.

There is no longer a need for this special community hunt. customary and traditional needs are being met and this special hunt is no longer needed. Joe Stam



IN REPLY REFER TO

# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
1011 East Tudor Road  
Anchorage, Alaska 99503-6199



PC52  
1 of 3



FWS/R7/FES

FEB 02 2018

Mr. Ted Spraker, Chairman  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Mr. Spraker:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game (Board) during its February 16-23, 2018 meeting addressing Central and Southwest Region Regulations. We reviewed the proposals and offer the following comments regarding Proposals 136 -139, 142-145, and 147-148.

## **Proposal 136 - Reauthorize the antlerless moose season in Unit 17A.**

**POSTION:** The Service **Supports** the proposed regulatory change

**Rationale:** The Unit 17A Moose Management Plan (MMP) states that antlerless moose hunting can be offered when the population is above 600 moose and increasing. The MMP also recommends a bag limit of up to two moose when the population exceeds 1,200 moose. The October 2017 moose population survey estimated 1,715 moose in Unit 17A and therefore an increased harvest can be provided.

## **Proposal 137 - Shift the Unit 17A fall resident moose season by starting and ending the season five days later than the existing season.**

**POSTION:** The Service **Supports** the proposed regulatory change - see comments for Proposal 138.

## **Proposal 138 - Lengthen the Unit 17A fall resident moose season by five days.**

**POSTION:** The Service **Supports** the proposed regulatory change

**Rationale:** The Unit 17A moose population is above the management objective range of 800-1200 moose and can support additional harvest of bulls. Composition data from recent surveys in October 2016 and 2017 estimated 60 and 77 bulls:100 cows, respectively. Providing the additional harvest opportunity is consistent with the objectives of the Unit 17A Moose Management Plan.



Mr. Ted Spraker

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**Proposal 139 - Lengthen the Unit 17A fall nonresident drawing permit hunt by ten days.**

*POSTION:* The Service is **Neutral** regarding the proposed regulatory change

Rationale: The current September 5-15 season provides a reasonable opportunity for nonresident hunters to harvest moose in Unit 17A. Liberalizing the harvest of antlerless moose during resident seasons (Proposal 136) and modifying harvest season dates (Proposals 137-138) may be sufficient to reduce population growth.

**Proposal 142 - Shift the fall hunting season dates for moose in a portion of Unit 17C to start and end five days later than the current season dates.**

**Proposal 143 - Open the resident winter season for moose in a portion of Unit 17C by emergency order.**

*POSTION:* The Service **Opposes** both proposed regulatory changes

Rationale: 1) The moose population in the affected area is stable to decreasing and this proposal has the potential to increase harvest, 2) the proposal would change the hunt unit boundaries and proposes to use a river as a unit boundary which creates both compliance and enforcement problems, and 3) if adopted, the proposal could create inconsistencies between federal and state seasons, and inconsistencies within Unit 17C moose seasons.

**Proposal 144 - Controlled Use Areas. Allow the use of motorized vehicles for moose hunting in the Upper Mulchatna Controlled Use Area (UMCUA).**

*POSTION:* The Service **Opposes** this proposed regulatory change

Rationale: A small portion of Togiak National Wildlife Refuge (Refuge) lies within UMCUA in western Unit 17B. The regulations at 43 CFR 36.11(g) restrict use of off-road vehicles within the Refuge. If this proposal was adopted, federal regulations would be in conflict with State regulations. State and Federal regulations currently align within the UMCUA.

**Proposal 145 – Open a nonresident registration hunt for bull caribou in Unit 17 and the portion of Unit 9 that lies within the range of the Mulchatna caribou.**

*POSTION:* The Service **Opposes** this proposed regulatory change

Rationale: The estimated number (27,000) of caribou in the Mulchatna Herd is below the population objective of 30,000-80,000. A composition survey in October 2017, estimated 32 bulls:100 cows which is below the management objective of 35 bulls:100 cows.



Mr. Ted Spraker

3

**Proposal 147 – Open a nonresident draw hunt for bull caribou in Units 18 and 19.**

**POSTION:** The Service **Opposes** this proposed regulatory change

**Rationale:** The estimated number (27,000) of caribou in the Mulchatna Herd is below the population objective of 30,000-80,000. A composition survey in October 2017, estimated 32 bulls:100 cows which is below the management objective of 35 bulls:100 cows.

**Proposal 148 – Unlawful methods of taking big game. Allow the use of a snowmachine for positioning caribou, wolf, or wolverine in Unit 17.**

**POSTION:** The Service **Opposes** this proposed regulatory change

**Rationale:** An existing regulation (50 CFR 36.12 (d)(3)) on Alaska National Wildlife Refuges states snowmachines shall be operated in such a manner as to prevent the herding, harassment, hazing or driving of wildlife for hunting or other purposes. The language to permit “use of a snowmachine to position caribou, wolf and wolverine” implies consent to herd, harass, haze or drive animals. Given that caribou occur in herds, pursuing caribou by snowmachine puts the entire herd into flight, causing physiological stress to unharvested animals during stressful winter periods.

Thank you for your time to review our comments on these proposals. If you have any questions, please contact our Regional Subsistence Coordinator, Ms. Carol Damberg, at (907) 786-3400 or email at [carol\\_damberg@fws.gov](mailto:carol_damberg@fws.gov) or our Supervisory Biologist, Togiak National Wildlife Refuge, Mr. Patrick Walsh, at (907) 842-8404 or email at [patrick\\_walsh@fws.gov](mailto:patrick_walsh@fws.gov).

Sincerely,



Regional Director



IN REPLY REFER TO:

## United States Department of the Interior

Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199

OSM 17109.PM

**FEB 02 2018**

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet February 16-23, 2018 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central/Southwest region. We have reviewed the 94 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed, some of the proposals received a descending opinion.

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

Sincerely,

Eugene R. Peltola Jr.,  
Assistant Regional Director

Enclosure



Chairman Spraker

2

cc: Anthony Christianson, Chair, Federal Subsistence Board  
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Jennifer Hardin, PhD, Policy Coordinator, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Chris McKee, Wildlife Division Chief, Office of Subsistence Management  
Chair, Southcentral Alaska Subsistence Regional Advisory Council  
Chair, Bristol Bay Subsistence Regional Advisory Council  
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council  
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,  
Alaska Department of Fish and Game  
Bruce Dale, Wildlife Division Director, Alaska Department of Fish and Game  
Jill Klein, Federal Subsistence Liaison Team Leader,  
Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



**RECOMMENDATIONS**  
**ALASKA BOARD OF GAME PROPOSALS**

**Central/Southwest Region**

**February 16-23, 2018**

**Dillingham, Alaska**

**Office of Subsistence Management (OSM)**



**PROPOSAL 76 – 5 AAC 92.015. Brown bear tag fee exemption.** Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

**Current Federal Regulations:**

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

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

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

**Impact to Federal subsistence users/wildlife:** There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal (although the National Park Service expressed opposition).

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

**PROPOSAL 85 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the resident hunting season for moose in Unit 16B Remainder (DM540, YM541 and RM574).

**Current Federal Regulation**

**Unit 16— Moose**

<i>Unit 16B—Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull</i>	<i>Sep. 1 - 15</i>
<i>Unit 16B—Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household</i>	<i>Sep. 1 – 30 Dec. 1 – Feb. 28</i>
<i>Unit 16B, remainder—1 bull</i>	<i>Sep. 1 – 30</i>



*Dec. 1 – Feb. 28*

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

**Impact to Federal subsistence users/wildlife:** These changes may benefit Federally qualified subsistence users, who would be able to harvest any bull during an extended fall season under State regulation. Any benefit to Federally qualified subsistence users is expected to be modest, given the small amount of Federal land in Unit 16B, and its distance from communities. However, these changes may result in increased harvest by non-Federally qualified users on non-Federal land, which could have a detrimental effect on the Unit 16B moose population.

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

**Rationale:** The proponent’s request includes the addition of 5 days to the end of the season, the elimination of all antler restrictions, and the relaxation of permitting and reporting requirements. Collectively, these changes represent a significant liberalization of the harvest regulations for moose in Unit 16B. While bull:cow ratios are high and recruitment is good, the most recent management report published by ADF&G indicates that the Unit 16B moose population is within the State’s population objective. In addition, harvest has increased in recent years. For the three regulatory years between 2014 and 2016, total moose harvest from Unit 16B averaged 331 moose, a 37% increase compared to the previous 3 regulatory years, when 242 moose were harvested. For the past two regulatory years, harvest has been within the harvest objective established for this Unit. This increase is attributable to increased harvest in both the general season hunt (GM000) and in the draw hunts established for regulatory year 2014 (DM540, YM541). While some liberalization of harvest may be warranted in Unit 16B, a more conservative approach is appropriate at this time.

**PROPOSAL 104 – 5 AAC 85.045(11). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 13.

**Current Federal Regulations:**

**Unit 13—Moose**

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

*Unit 13, remainder—1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20.*

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. Additionally, the moose population in Unit 13A is above State



management objectives. Antlerless moose harvest is recommended to slow the growth of the Unit 13A moose population, preventing nutritional stress and habitat degradation.

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

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in this unit and provide management flexibility. Additionally, it may help to slow growth of the Unit 13A moose population.

**PROPOSAL 105 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the antlerless moose hunt in Unit 13.

**Current Federal Regulations:**

**Unit 13—Moose**

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

*Unit 13, remainder—1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20.*

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

**Impact to Federal subsistence users/wildlife:** Eliminating the antlerless moose season would decrease opportunity for Federally qualified subsistence users. Additionally, the moose population in Unit 13A is above State management objectives. Antlerless moose harvest is recommended to slow the growth of the Unit 13A moose population, preventing nutritional stress and habitat degradation.

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

**Rationale:** This proposal would decrease opportunity for Federally qualified subsistence users and may contribute to unsustainable growth of the Unit 13 moose population.

**PROPOSAL 112 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Lengthen the hunting season for brown bear in Unit 11.

**Current Federal Regulations:**

**Unit 11—Brown Bear**

*1 bear Aug. 10-June 15.*



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

**Impact to Federal subsistence users/wildlife:** Adopting Proposal 112 would provide Federally qualified subsistence users with more harvest opportunity. However, it would also misalign State and Federal regulations, which increases regulatory complexity and user confusion. There are no conservation concerns for this proposal as the Unit 11 brown bear population is considered abundant and likely not influenced by hunting, the unit experiences low harvest pressure, and most bears are harvested in the fall (Stantorf 2015).

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal (although the National Park Service expressed opposition with concurrence from the U.S. Fish and Wildlife Service).

**Rationale:** There are not conservation concerns and this proposal would provide an additional 15 days of harvest opportunity for Federally qualified subsistence users. However, it may increase user confusion and regulatory complexity by misaligning State and Federal regulations.

Stantorf, C.J. 2015. Unit 11 brown bear. Chapter 10, Pages 10-1 through 10-7 [In] P. Harper and L.A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012-30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau.

**PROPOSAL 113 – 5 AAC 84.270. Furbearer trapping.** Lengthen the trapping season for wolverine in Unit 13 to February 28.

**Current Federal Regulation**

**Trapping**

**Unit 13—Wolverine**

*No limit*

*Nov. 10 – Jan. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18-14, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, requests an extension of the wolverine hunting and trapping seasons in Unit 13. The proposed Unit 13 trapping season would change from Nov. 10 – Jan. 31 to Nov. 10 – Feb. 28, which would match the existing trapping season in Unit 11.



**Impact to Federal subsistence users/wildlife:** If adopted, Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed trapping regulations. The State and Federal seasons for wolverine trapping in Unit 13 would also be aligned if Proposal WP18-14 was adopted by the Board. In addition, it would allow trappers to keep wolverines incidentally caught in a lynx set.

Wolverines, which occur at low densities throughout Alaska, have large home ranges ranging from 39 mi<sup>2</sup> to 386 mi<sup>2</sup>. The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 kits are born between February and April. The kits remain with female for 12-14 weeks. Adoption of this proposal would extend the harvest into the denning period.

The annual wolverine harvest in Unit 13 from 2007-2016, averaged 51 (range 37-63) animals (Robbins 2013). Wolverine populations occur in low densities and thus are susceptible to overharvest. Harvest opportunity is already being provided for in Unit 13 and seems to be currently sustainable with the hunting and trapping season closing on January 31. Given the lack of biological data on wolverine populations in Unit 13, it is difficult for managers to monitor the harvest and thus the biological impact extending the harvest season is unknown. In the past this was one of the factors why the wolverine season was a month shorter in Unit 13 than in Unit 11.

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

**Rationale:** Extending the wolverine trapping season on State lands would provide Federally qualified subsistence users with additional harvest opportunity and has the potential, depending on the Federal Subsistence Board's action on WP18-14, to align State and Federal wolverine and lynx seasons. However, adopting these regulations also has the potential for overharvest. Low reproductive rates, inherently low population densities, and susceptibility to harvest pressure combined with the lack of population data to assess the biological impact of increased harvest suggest that conservative harvest strategies are warranted for wolverines in Unit 13.

**Literature Cited:**

Robbins, W. F. 2013. Units 11 and 13 furbearer management report. Pages 138-162 *in* P. Harper and L.A. McCarthy, editors. Furbearer management report of survey and inventory activities 1 July 2009 – 30 June 2012. ADF&G, Species Management Report, ADF&G/DWC/SMR-2013-5, Juneau, AK.

**PROPOSAL 114 – 5 AAC 84.270 Furbearer trapping.** Extend the trapping season for wolverine in Unit 13 to February 28.

See comments for Proposal 113.



**PROPOSAL 115 – 5 AAC 84.270. Furbearer trapping.** Extend the trapping season for wolverine in Units 11 and 13 to February 28.

**Current Federal Regulation**

**Trapping**

**Unit 11—Wolverine**

*No limit*

*Nov. 10 – Feb. 28*

**Unit 13—Wolverine**

*No limit*

*Nov. 10 – Jan. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18-14, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, requests an extension of the wolverine hunting and trapping seasons in Unit 13. The proposed Unit 13 trapping season would change from Nov. 10 – Jan. 31 to Nov. 10 – Feb. 28, which would match the existing trapping season in Unit 11.

**Impact to Federal subsistence users/wildlife:**

Unit 11

If adopted, Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed trapping regulations in Unit 11. State and Federal seasons for wolverine trapping in Unit 11 would also be aligned if Proposal WP18-14 was adopted by the Federal Subsistence Board. In addition, it would allow trappers to keep wolverines incidentally caught in a lynx set.

Wolverines, which occur at low densities throughout Alaska, have large home ranges ranging from 39 mi<sup>2</sup> to 386 mi<sup>2</sup>. The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 kits are born between February and April. The kits remain with the female for 12-14 weeks. Adoption of this proposal would extend the harvest into the denning period.

All harvested wolverines are required to be sealed by the State. Wolverine harvest in Unit 11 remains relatively low given the amount of potential wolverine habitat that is available. Between 2006 and 2016, an average of 10 wolverines/year were reported harvested in Unit 11. In Unit 11, wolverine harvest occurred from November to February with the peak months being December through February during the period 2007-2011.

Unit 13



See comments for Proposal 113 for Unit 13.

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

**Rationale:** Extending the wolverine trapping season on State lands provides Federally qualified subsistence users with additional harvest opportunity and has the potential, depending on the Federal Subsistence Board’s action on WP18-14, to align the State and Federal wolverine and lynx seasons. However, adopting these regulations also has the potential for overharvest. Low reproductive rates, inherently low population densities, susceptibility to harvest pressure and impacts of climate change combined with the lack of population data to assess the biological impact of increased harvest suggest that conservative harvest strategies are warranted for wolverines in Units 11 and 13.

**PROPOSAL 119 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Lengthen the hunting season for ptarmigan in Unit 13B.

**Current Federal Regulation:**

**Unit 13 – Ptarmigan (Rock, Willow, and White-tailed)**

*20 per day, 40 in possession*

*Aug. 10-Mar. 31*

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

**Impact to Federal subsistence users/wildlife:** This area experiences some of the highest levels of ptarmigan hunting statewide, due to its close proximity to the Denali and Richardson Highways. In 2009, the season was shortened due to low population numbers for rock ptarmigan. Since that time, rock ptarmigan and willow ptarmigan have shown a slight increasing population trend, indicating that late winter harvest in this unit may be additive and could have significant impacts to the population. Although both willow ptarmigan and rock ptarmigan populations have experienced growth during this time, rock ptarmigan populations are still low. Additional harvest in this heavily used area could result in population declines for this species.

Adoption of this proposal will result in alignment of State and Federal regulations, which will decrease regulatory complexity, user confusion, and law enforcement concerns.

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

**Rationale for comment:** Adoption of this proposal would increase harvest in one the most hunted units in the state. Late winter harvest in this area may be additive to natural ptarmigan mortality. Ptarmigan populations naturally fluctuate and are currently in a population high for this area and are expected to enter the population decline stage of the cycle in the next couple years. Maintaining the shorter season for ptarmigan in Unit 13B for a full population cycle would provide a better understanding of how late winter harvest impacts these populations and may also allow for the continued recovery of rock ptarmigan populations.



**PROPOSAL 120 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Align the hunting seasons and reduce the bag limit for ptarmigan in Units 13E and 13B.

**Current Federal Regulation:**

**Unit 13 – Ptarmigan (Rock, Willow, and White-tailed)**

*20 per day, 40 in possession*

*Aug. 10-Mar. 31*

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

**Impact to Federal subsistence users/wildlife:** This area experiences some of the greatest levels of ptarmigan hunting statewide, due to its close proximity to the Denali and Richardson Highways. In 2009, the season in Unit 13B was shortened due to low population numbers for rock ptarmigan. Since that time, rock ptarmigan and willow ptarmigan have shown a slight increasing population trend in the unit, indicating that late winter harvest may be additive and can have significant impacts to the population. Although both willow ptarmigan and rock ptarmigan populations have experienced growth during this time, rock ptarmigan populations are still low. Furthermore, willow ptarmigan abundance has remained low in Unit 13E since 2005. Additional harvest in this heavily used area could result in population declines for ptarmigan.

Adoption of this proposal will result in misalignment of State and Federal regulations, which may increase regulatory complexity, user confusion, and law enforcement concerns. It would also make ptarmigan harvest less efficient for Federally qualified subsistence users harvesting on non-Federal lands, by limiting the daily bag limit.

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

**Rationale for comment:** A shorter ptarmigan season is already in place for Unit 13B and appears to be having a positive impact on the population in the area. Further modification of harvest regulations in Unit 13B may be unwarranted. The season in Unit 13E still extends through March 31 although ptarmigan harvest is high and populations have remained low. Although it would limit harvest opportunity for Federally qualified users harvesting on non-Federal lands, it may be worth adopting more conservative regulations in Unit 13E in the future to match previous regulatory actions taken in Unit 13B.

**PROPOSAL 121 – 5 AAC 85.065 (3). Hunting seasons and bag limits for small game.** Lengthen the hunting season for ptarmigan in Unit 13B.

**Current Federal Regulation:**

**Unit 13 – Ptarmigan (Rock, Willow, and White-tailed)**

*20 per day, 40 in possession*

*Aug. 10-Mar. 31*

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



**Impact to Federal subsistence users/wildlife:**

See comments for Proposal 119.

**PROPOSAL 122 – 5 AAC 92.540. Controlled Use Areas.** Modify the Sourdough Controlled Use Area.

**Current Federal Regulations:**

**§ 100.26 Subsistence Taking of Wildlife**

*(13)(ii) Within the following areas, the taking of wildlife for subsistence uses is prohibited or restricted on public lands:*

*(C) Except for access and transportation of harvested wildlife on Sourdough and Haggard Creeks, Middle Fork trails, or other trails designated by the Board, you may not use motorized vehicles for subsistence hunting in the Sourdough Controlled Use Area. The Sourdough Controlled Use Area consists of that portion of Unit 13B bounded by a line beginning at the confluence of Sourdough Creek and the Gulkana River, then northerly along Sourdough Creek to the Richardson Highway at approximately Mile 148, then northerly along the Richardson Highway to the Middle Fork Trail at approximately Mile 170, then westerly along the trail to the Gulkana River, then southerly along the east bank of the Gulkana River to its confluence with Sourdough Creek, the point of beginning.*

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

**Impact to Federal subsistence users/wildlife:** This proposal would have no impact to wildlife. It will reduce user confusion by clarifying where motorized access is permitted near the Sourdough Controlled Use Area (Sourdough CUA). However, while the boundaries of the Sourdough CUA are identical under Federal and State regulations, these clarifications will not be reflected under Federal regulations. A similar Federal proposal would need to be submitted for consideration by the Federal Subsistence Board in order for Federal and State descriptors to match.

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

**Rationale:** There are no conservation concerns for this proposal, and it will reduce user confusion.

**PROPOSAL 126 - 5 AAC 85.025). Hunting seasons and bag limits for caribou.** Increase the bag limit for the Southern Alaska Peninsula Caribou Herd (SAPH) based on the harvestable surplus in Unit 9D.

**Current Federal Regulations:**



**Unit 9D – Caribou**

*1 bull caribou by Federal registration permit only. Quotas and any needed closures will be announced by the Izembek Refuge Manager after consultation with ADF&G.* Aug. 10–Sept.20  
Nov.15–Mar. 31

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18–20, submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council, requests that the harvest limit be changed from 1 bull to 1 caribou and that the fall harvest season be extended from Aug. 10 – Sept. 20 to Aug. 1 – Sept. 30 in Unit 9D.

**Impact to Federal Subsistence users/wildlife:** If adopted, this proposal would provide more opportunity for Federally qualified users hunting under State regulations.

The caribou population is currently at about 50% of the lower threshold of 3,000 recommended under the Southern Alaska Peninsula Caribou Herd Operational Plan. The increasing population trend and good bull:cow ratios since 2013 suggests that at current harvest rates and hunting intensity, the SAPH could sustain a slight increase in the harvest.

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

**Rationale:** The SAPH within Unit 9D is currently at approximately 1,500 animals. The population trend is increasing, and for the last 3 consecutive years, bull:cow ratios have been above 20:100, which suggest that increasing the harvest limit based on the harvestable surplus is a viable option. However, the tendency for this population to undergo wide fluctuations and a current population level at approximately 50% of the recommended lower threshold also suggests caution.

**PROPOSAL 127 – 5 AAC 85.025. Seasons and bag limits for caribou.** Open a resident hunting season for caribou in a portion of Unit 9C.

**Current Federal Regulation**

**Unit 9— Caribou**

*Unit 9C, that portion within the Alagnak River drainage—2 caribou by State registration permit; no more than 1 caribou may be a bull, and no more than 1 caribou may be taken Aug. 1-Jan. 31* Aug. 1 – Mar. 15

*Unit 9C, remainder—1 bull by Federal registration permit or State permit. Federal public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik* May be announced



**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18-21 requests, in part, the changes requested by State Proposal 127.

**Impact to Federal subsistence users/wildlife:** These changes will likely benefit Federally qualified subsistence users, who will have additional opportunity to harvest caribou in Unit 9C. In addition, if both the Alaska Board of Game and the Federal Subsistence Board adopt these proposals, State and Federal caribou regulations in this area will continue to be well aligned, minimizing confusion for those who hunt under both sets of regulations. These changes are not expected to have a detrimental effect on the Mulchatna Caribou Herd (MCH), primarily because they do not alter harvest limits for the herd. Rather, they align hunt areas for this population with its current distribution patterns.

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

**Rationale:** Establishing a season and harvest limit in the northern portion of the Naknek drainage shifts the primary regulatory emphasis from the Northern Alaska Peninsula Caribou Herd (NAPCH) to the MCH. This area has been used by the NAPCH in the past, when population density was high. However, the regulatory structure continues to reflect this, despite infrequent presence of the NAPCH north of the Naknek River. The proposed change will reflect the management needs of the MCH, and appears to be biologically appropriate at this time given current movement and distribution patterns. These changes are not expected to have a detrimental effect on either herd but will provide additional opportunity for resident hunters to harvest caribou in Unit 9.

**PROPOSAL 128 – 5 AAC 85.057. Hunting seasons and bag limits for caribou.** Allow the harvest of any caribou in Unit 10, Adak Island.

**Current Federal Regulation:**

**Unit 10 – Caribou**

*Unit 10 – remainder – no limit.*

*July 1–June 30*

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

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users would be provided more opportunity to harvest caribou with fewer restrictions under the proposed hunting regulations.

The Adak caribou population increased about 300% from 1993 to 2005 and has remained at approximately 2500 animals from 2005 -2012. The caribou population estimate in 2012 was between 2512 and 2880 animals. One of the concerns of the Alaska Maritime National Wildlife Refuge about this herd is the potential adverse impact on native plant communities and the natural integrity of Adak Island.



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

**Rationale:** The removal of restrictions under State regulations provides more opportunity for Federally qualified subsistence users. Maintaining hunting pressure on this introduced caribou herd on Adak Island may help limit the population size and limit the ecosystem impacts.

**PROPOSAL 129 – AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the resident hunting season for moose in Unit 9B.

**Current Federal Regulation**

**Unit 9— Moose**

*Unit 9B—1 bull by State registration permit*

*Sep. 1 – 20*

*Dec. 1 – Jan. 15*

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

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users will likely benefit from this change, due to increased opportunity on non-Federal lands. Because this change will align State and Federal fall moose seasons in Unit 9B, Federally qualified subsistence users will also benefit from reduced regulatory complexity. This change is not expected to have a detrimental effect on the Unit 9B moose population.

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

**Rationale:** Although the Unit 9B moose population is a low-density population, it is believed to be relatively stable. The bull:cow ratio has increased in recent years, and currently exceeds the State’s management objective. Harvest remains low, relative to population size, and it is likely that this population can support additional bull harvest. This change will align State and Federal fall moose seasons in Unit 9B, which will ease confusion among those users eligible to hunt under both State and Federal regulation.

**PROPOSAL 134 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Shorten the season for ptarmigan and reduce the bag limit in Unit 9.

**Current Federal Regulation:**

**Unit 9 – Ptarmigan (Rock, Willow, and White-tailed)**

*20 per day, 40 in possession*

*Aug. 10-Apr. 30*

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



**Impact to Federal subsistence users/wildlife:** Adoption of this proposal will result in misalignment of State and Federal regulations, which may increase regulatory complexity, user confusion, and law enforcement concerns. Furthermore, this proposal would decrease opportunity for Federally qualified subsistence users to harvest ptarmigan on non-Federal lands in Unit 9.

Ptarmigan populations in Unit 9 appear to be very low. Wet and cold summers during the last two years led to high chick mortality across the Alaska Peninsula. Populations have had limited concealment in the winter due to the lack of snow in the area, and therefore a lack of camouflage, which has led to higher predation.

Ending the season on March 1 would close the season prior to most ptarmigan arriving on breeding grounds. This would protect the population during the breeding season, but would also limit the ability of Federally qualified users to harvest ptarmigan on non-Federal lands, due to the season closure prior to the arrival of ptarmigan to the most western reaches of their range.

A companion proposal would need to be submitted to the Federal Subsistence Board to gain consistency across State and Federal regulations.

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

**Rationale for comment:** Although this proposal would decrease opportunity for local Federally qualified subsistence users, these users could still harvest under Federal regulations on Federal public lands and it would provide protection to ptarmigan and give populations a chance to recover in portions of Unit 9.

**PROPOSAL 135 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Close the season for Alaska hares in Unit 9.

**Current Federal Regulations:**

**Unit 9 – Hare**

*No limit.*

*July 1–June 30*

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

**Impact to Federal subsistence users/wildlife:** If this proposal was adopted there would be little to no impact on Federal qualified subsistence users but it would eliminate hunting pressure on declining populations of Arctic hare (*Lepus othus*) in the southern portion of the Alaska Peninsula. For these regulations to be more effective, similar regulations would need to be made in Federal Subsistence regulations as Federal public lands comprise approximately 85% of Unit 9C, 45% of Unit 9D, and 49% of Unit 9E. Since Federal Subsistence regulations currently do not distinguish between the two species of



hares that occur in Alaska, the snowshoe hare (*Lepus americanus*) and the Arctic hare (*Lepus othus*), new regulations, specifically for the Arctic hare, would have to be developed.

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

**Rationale:** Arctic hares were once abundant in Unit 9 and now occur at low densities. Although little is known about the Arctic hare populations in the Alaska Peninsula, the decrease may be related to habitat changes as a result of climate change and/or predation. Eliminating the hunting pressure will help address some conservation concerns for local populations of Arctic hares in Units 9C, 9D, and 9E.

**PROPOSAL 136 – 5 AAC 85.045(15). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in Unit 17A.

**Current Federal Regulation**

**Unit 17— Moose**

*Unit 17A—1 bull by State registration permit*

*Aug. 25 – Sep. 20*

*Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit*

*Up to a 31 – day season may be announced between Dec. 1 – last day of Feb.*

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. It is not expected to have a detrimental effect on the Unit 17A moose population.

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

**Rationale:** This proposal is consistent with the Unit 17A moose management plan, which indicates a limited antlerless harvest when the moose population exceeds 600 animals. The current population estimate is in excess of that threshold, and this proposal provides management flexibility. It also provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the population.

**PROPOSAL 142 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.** Shift the resident fall hunting season dates for moose in a portion of Unit 17C.

**Current Federal Regulation**



**Unit 17— Moose**

*Units 17B and 17C—one bull.*

*Aug. 20 – Sep. 15*

*Dec. 1 – 31*

*During the period Aug. 20 – Sep. 15—one bull by State registration permit;*

*or*

*During the period Sep. 1 – 15—one bull with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side with a State harvest ticket;*

*or*

*During the period Dec. 1 – 31—one antlered bull by State registration permit*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18-26 requests the same changes as State Proposal 142.

**Impact to Federal subsistence users/wildlife:** These changes would provide additional opportunity to Federally qualified subsistence users. Harvest would likely increase, which may have a detrimental effect on the Unit 17C moose population.

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

**Rationale:** These changes are likely to increase moose harvest within Unit 17C. Delaying the season by 5 days will allow hunters more access to moose as bulls enter the rutting season and become more vulnerable to harvest. While this may increase subsistence opportunity in the short term, it is not clear that the moose population in Unit 17C can sustain additional harvest without negative consequences. Maintaining more conservative harvest regulations in this area offers the best chance for long-term subsistence opportunity.

**PROPOSAL 143 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.** Open the resident winter season for moose in a portion of Unit 17C by emergency order only.

**Current Federal Regulation**

**Unit 17— Moose**



*Units 17B and 17C—one bull.*

*Aug. 20 – Sep. 15*

*Dec. 1 – 31*

*During the period Aug. 20 – Sep. 15—one bull by State registration permit;*

*or*

*During the period Sep. 1 – 15—one bull with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side with a State harvest ticket;*

*or*

*During the period Dec. 1 – 31—one antlered bull by State registration permit*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18-25 requests the same changes as State Proposal 143.

**Impact to Federal subsistence users/wildlife:** These changes would provide additional opportunity to Federally qualified subsistence users. Harvest would likely increase, which may jeopardize the long-term viability of the Unit 17C moose population.

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

**Rationale:** Winter moose harvest within Unit 17C is likely to increase if the season occurs when conditions are favorable, rather than at a fixed time. The proximity of this hunt area to Dillingham, whose residents harvest most of the moose taken within Unit 17C, increases the likelihood of additional harvest. While these changes are likely to increase subsistence opportunity in the short term, low recruitment in at least some portions of Unit 17C has resulted in low bull:cow and calf:cow ratios, which presents conservation concerns for this population. Maintaining more conservative harvest regulations in this area offers the best chance for long-term subsistence opportunity.

**PROPOSAL 148 – 5 AAC 92.080(4)(B)(i). Unlawful methods of taking big game.** Allow the use of a snowmachine for harvesting caribou, wolf, or wolverine in Unit 17.

### **Existing Federal Regulation**

#### **50 CFR 100.4 and 36 CFR 242.4 Definitions**

*Take or taking as used with respect to fish or wildlife, means to pursue, hunt, shoot, trap, net, capture, collect, kill, harm, or attempt to engage in any such conduct.*



§ \_\_\_\_ .26 Subsistence taking of wildlife

...

*(b) Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:*

...

*(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased;*

*(5) Using a motorized vehicle to drive, herd, or molest wildlife.*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP18-24 requests the same changes as State Proposal 148.

**Impact to Federal subsistence users/wildlife:** This proposal would address the need for Federally qualified subsistence users to be able to use the most efficient and effective methods to take wild resources important for their livelihood. The proposed regulation is not expected to result in significant population changes for caribou, wolves, or wolverines as snowmachines are already extensively utilized in Unit 17 to access hunting grounds and trap lines, and harvest numbers will continue to be managed by season and limits within regulation.

This proposal was opposed by the Bristol Bay Regional Subsistence Advisory Council.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal (although the National Park Service expressed opposition with concurrence from the U.S. Fish and Wildlife Service).

**Rationale:** The proposed regulatory changes would ensure that Federally qualified subsistence users are provided the opportunity to use snowmachines as an efficient and effective means to harvest caribou, wolves, and wolverines during winter months in Unit 17.

The proposed changes would have little to no effect on current hunting behavior, and any changes in the population status of caribou, wolves, and wolverines are anticipated to continue to be addressed through season and bag limits.

**PROPOSAL 150 – 5 AAC 85.045(1). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunts in Unit 1C.

**Current Federal Regulation**



**Unit 1— Moose**

*Unit 1C—that portion south of Point Hobart including all Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only*      *Sep. 15 – Oct. 15*

*Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only*      *Sep. 15 – Oct. 15*

*Unit 1C, Berners Bay*      *No open season*

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

**Impact to Federal subsistence users/wildlife:** This proposal will help ensure population viability and subsistence opportunity in the long term.

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

**Rationale:** The option for antlerless hunts is an important component in Unit 1C moose management. The Berners Bay hunt area is relatively small and its geography allows for little immigration or emigration of moose. Consequently, this population requires careful management of size and sex ratios. Similarly, habitat overuse is of concern in the Gustavus hunt area. In both of these areas, antlerless hunt have been used to help maintain appropriate population metrics. Although the harvestable surplus in these populations is sometimes quite low and antlerless hunts are not offered every year, they remain an important tool for local managers. Retention of this management flexibility offers the best potential for long term viability of these moose populations, which is important for long term subsistence opportunity.

**PROPOSAL 151 – AAC 85.045(3). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunt in Unit 5A, the Nunatak Bench hunt.

**Current Federal Regulation**

**Unit 5— Moose**

*Unit 5A—Nunatak Bench—1 moose by State registration permit only. The season will be closed when 5 moose have been taken from the Nunatak Bench*      *Nov. 15 – Feb. 15*



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

**Impact to Federal subsistence users/wildlife:** This proposal will help ensure harvest opportunity for Federally qualified subsistence users in the long term. There will be no effect on the moose population at this time, because no harvest permits are currently being offered. In the long term, this proposal helps ensure population viability.

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

**Rationale:** The option for antlerless hunts is an important component of managing this population. Because the hunt opens after other Unit 5 moose hunts have closed, it offers additional opportunity to hunters who were otherwise unsuccessful. However, this is a time when few moose carry antlers, particularly later in the season. Given the limited habitat in this area, careful regulation of population size is necessary to avoid overpopulation. Although the Nunatak Bench moose population is currently below the State’s population objective and no harvest is allowed, authorizing antlerless harvest provides local managers the flexibility to provide harvest opportunity if and when the population reaches the requisite size. It also guards against overpopulation. As such, it offers the best opportunity for both long term viability of the moose population and long term subsistence opportunity.

**PROPOSAL 152 - 5 AAC 85.045(4). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in Unit 6C.

**Current Federal Regulations**

***Unit 6C—Moose***

*1 antlerless moose by Federal drawing permit only. Permits for the portion of the antlerless moose quota not harvested in the Set. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.* *Sept. 1 – Oct. 31*

*1 bull by Federal drawing permit only.* *Sept. 1 – Dec. 31*

*In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose permit may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec. 31.*

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



**Impact to Federal Subsistence users/wildlife:** The population estimates for moose in Unit 6C in 2013 and 2104 was 609 and 601, respectively. The State population objective for Unit 6C is 400-500 moose and a minimum bull:cow ratio of 25 bulls:100 cows.

Currently, demand for moose in Unit 6C exceeds the number of moose that can be harvested. From 600 to 900 Cordova residents have annually applied for between 5 and 104 Federal subsistence draw permits for moose in Unit 6C. The current Federal regulations for moose in Unit 6C, generated with great community support, have worked well since adopted in its current form by the Federal Subsistence Board in 2002.

All allowable antlerless moose harvest and 75% of the allowable bull moose harvest in Unit 6C are allocated to Federally qualified subsistence users of Units 6A, 6B, and 6C, specifically, residents of Cordova. The State’s proposal was intended to harvest moose allocated to the Federal quota that may not be taken during the Federal subsistence hunt.

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

**Rationale:** This proposal has potential to allow additional opportunity for non-Federally qualified users to harvest moose in Unit 6C if the current demand for moose goes down. However, the demand by Federally qualified users currently exceeds the allowable harvest and is not likely to change in the immediate future.

**PROPOSAL 154 - 5 AAC 85.045(13). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season and targeted moose season in Unit 15C, that portion south of the south fork of the Anchor River and northwest of Kachemak Bay.

**Current Federal Regulations:**

**Unit 15A remainder, 15B, 15C—Moose**

*Unit 15A—remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug. 10–Sept. 20*

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

*Unit 15C—1 cow by Federal registration permit only Aug. 10–Sept. 20*



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

**Impact to Federal subsistence users/wildlife:** This proposal would increase harvest opportunity for Federally qualified subsistence users. In February 2013, the moose population in Unit 15C was 3,204 (range 2,544-3,855), which the State considers stable. The 2013 bull: cow ratio was 22 bulls:100 cows which is above the State's management post-hunting objective of 15-20 bulls: 100 cows but below recommendations by the Kenai NWR of 40-60 bulls:100 cows for the Caribou Hills and 25-30 bulls:100 cows for the remainder of Unit 15C.

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

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in this unit and provide management flexibility. An antlerless hunt is currently sustainable given the current population levels and tracking of harvest via a registration and drawing permits.

**PROPOSAL 155 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

**Current Federal Regulations:**

**Unit 7—Moose**

*Unit 7, remainder--1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 10-Sep. 20.*

**Unit 14—Moose**

*No Federal open season*

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. There are no conservation concerns because ADF&G determines the number of permits to issue for this hunt each year based on current estimates of the moose population, bull:cow ratios, and winter mortality.

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

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in this unit and provide management flexibility. There are no conservation concerns.

**PROPOSAL 161 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season and targeted moose season in the western portion of Unit 26A.



**Current Federal Regulations:**

**Unit 26A—Moose**

*Unit 26A—that portion west of 156°00'W Long. and excluding the Colville River Drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf. July 1–Sept. 14*

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users.

Moose numbers declined by 75% from 2008 in Unit 26A in 2013-2014 due to severe winter conditions and predation. As a result the Alaska Department of Fish and Game issued emergency orders for RY14 which closed the drawing permit hunts, all nonresident hunts, and the winter hunt. The limited moose hunt in western Unit 26A from July 1 - Sept. 14 remained open because very few moose are harvested in this area.

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

**Rationale:** Although this proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in, an antlerless hunt is not recommended at this time due to the declining moose population in this portion of Unit 26A.

**PROPOSAL 162 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.** Reauthorize resident brown bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

**Current Federal Regulations:**

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

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

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

**Impact to Federal subsistence users/wildlife:** There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.



**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal (although the National Park Service expressed opposition).

**Rationale:** There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.

**PROPOSAL 163 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.** Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23, and 26A.

**Current Federal Regulations:**

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

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

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

**Impact to Federal subsistence users/wildlife:** There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal (although the National Park Service expressed opposition).

**Rationale:** There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.



Submitted By  
Ernie Weiss  
Submitted On  
1/10/2018 10:26:37 AM  
Affiliation  
Aleutians East Borough

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Email  
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Anchorage, Alaska 99504

Re: Support for Proposal 126

The Aleutians East Borough is a municipal government located on the Alaska Peninsula and Eastern Aleutian Islands. Our local communities include Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon and Sand Point. Our Borough fully envelopes Game Unit area 9D. The Aleutians East Borough *supports* ADFG Proposal 126 to increase the bag limit for the South Alaska Peninsula caribou herd in Unit 9D as the population increases. We agree with the Department that the caribou population is increasing and can now support increased harvest. We believe the proposed strategy for a stepwise increase in the bag limit based on population increases will help keep the herd at sustainable levels, while providing needed increased hunting opportunities for AEB residents. The proposed strategy should be an excellent management tool for the Department to manage this caribou herd.

Thank you for the opportunity to comment.

Ernie Weiss, AEB Natural Resources Director



Submitted By  
Tom Wellman  
Submitted On  
1/21/2018 9:33:39 AM  
Affiliation  
None

I support Proposal 92. As a long time Alaska resident, I find this solution to be fair and equitable. It has been far too long that the table has been tipped too far toward local priority, thus depriving the rest of Alaskans to be disenfranchised.

**PROPOSAL 92** - 5 AAC 85.025. Hunting seasons and bag limits for caribou; 85.045.

Hunting seasons and bag limits for moose; and 92.072. Community subsistence harvest hunt area and permit conditions. Eliminate the community subsistence harvest hunts for moose and caribou as follows:

**Repeal the current community subsistence harvest hunt for the Copper Basin area.** Default back to the old general season moose hunt: September 1 through September 20, spike-fork, four brow tines, 50-inches. Increase the number of draw permit tags from the current allocation of five to 100 tags.

What is the issue I would like the board to address and why? Eliminate the community subsistence moose and caribou hunts.

Harvest and population data from ADF&G suggest that customary and traditional needs are being met for all qualified residents in Units 11, 12, and 13. Those qualifying residents are allowed a 50-day hunting season for one federal subsistence "any bull" moose permit, plus two federal subsistence caribou permits for hunting in the four million acres of federal lands. Then you have a 20-day state general season moose hunt, with a spike-fork, 50-inches or four brow tines regulation, and a 40-day fall season for Tier I caribou hunters. In addition to this, Ahtna members have access to another 1.7 million acres of Ahtna private lands which provides exclusive use by Ahtna members to hunt.

All of this opportunity combined meets the intent of reasonable opportunity.

PROPOSED BY: Anchorage Fish and Game Advisory Committee (HQ-F17-015)

Nothing in state law or the Alaska State Constitution **REQUIRES** that the BOG provide any user group with a priority harvest of publicly owned game when abundant harvest is available. Only the Feds are doing that on all the 60% of federally managed lands/waters in Alaska. Anyone living in the Nelchina Basin for at least a full year can walk into the BLM office in Glennallen and get 1 antlered bull moose and 2 caribou harvest tickets to hunt on over 4 million acres of federal lands before the state general hunt opens. Alaskans living in state non-subsistence areas do not qualify for that opportunity. Over 80 any bull moose (FM1301) and 300 caribou (FC1302) are being harvested annually in GMU 13 in federal hunts by residents of GMU 13, 11, 12, and 20 only. **That is a local priority.**

It's reasonable that the BOG would protect my equal opportunity to hunt during times of abundant harvest on 9.5 million acres of easily accessible state-owned lands in GMU 13.



Submitted By  
Don Welty  
Submitted On  
10/4/2017 9:45:15 AM  
Affiliation

~~PROPOSAL 117– 5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the harvest and possession limits for grouse in Unit 11 as follows:

Grouse --Unit 11: Five [FIFTEEN] per day, ten [THIRTY] in possession, of which not more than two per day and four in possession may be ruffed grouse.

Regarding the above proposal: I support the above proposal as written. I believe it will spread opportunity and the harvest of grouse out over a wider variety of users.

Submitted by: Brian West  
1000 Oceanview  
Anch Ak  
99515



OCT 25 2017

BOARDS  
ANCHORAGE

Central/Southwest Region

Proposal 74. Support. Why should it matter if a non-resident wants to hunt every year and is successful?

Proposal 75. Against. This would prohibit a sheep hunter from maximizing his guided hunt. Many non-resident sheep hunters also hunt moose, caribou or bear while on their sheep hunt, adopting this proposal would eliminate this opportunity. He already needs the guide for the sheep, why not let him take other animals too.

Proposal 76. Support.

Proposal 79. Against. Non-resident allocation should not be increased. Every year many residents apply for but do not receive permits. It is disgraceful that any permits go to non-residents when resident demand cannot be met.

Proposal 83. Against. Prosecute the illegal hunters. Just because a number of unethical hunters will shoot anything with antlers does not mean you should punish those who are able to determine antler spread. Prosecuting those who shoot under sized animals would solve the problem.

Proposal 92. Support. The CSH was instituted in response to the Ahtna tribe complaining that they did not receive enough permits under the Tier II system and their desire to be guaranteed hunting opportunities. There is no reasonable explanation as to why the CSH exists. Any hunter is free to share his kill with any community/household member he chooses. In its essence customs and traditions are based on an individual. Every community is made up of individuals. A CSH designation is not needed for a person or group of individuals to practice customs and traditions. These may also vary among individuals. Also, all customs and traditions can be passed from one generation to another through oral history.

Proposal 93. Support

Proposal 94. Support

Proposal 95. Support.

Proposal 96. Support

Proposal 97. Support.

Proposal 98. Against. This is another attempt by Ahtna to impose their values on all Alaskans. Some of the items identified are ill-legal for non-natives. How can new comers to the State ever hope to qualify under this proposal? This proposal and the CSH program are racially preferenced.

Proposal 99. Support

Proposal 100. Support.

Proposal 101. Against. Unit 13 caribou are highly sought after by many user groups. There is no logical reason for a youth hunt. The current hunt opens August 10, several weeks before the start of the



school year. This appears to be a means for adults to hunt early and bring a kid along. If they are worried about safety they may want to utilize the Clearwater controlled use area.

Proposal 102. Against.

Proposal 103. Against. Eliminate the CSH, it cannot be fixed.

Proposal 107. Against. I made a similar request last year in response to a number of proposals. However, this would only be agreeable if the CSH for any bull moose was eliminated.

Proposal 123. Support.

Proposal 124. Support. The intent of the proxy system is to allow an individual to harvest game for someone who is physically unable to do so. It is not always possible for an individual to find a proxy because of the restrictions. A willing hunter who hunts in a different area should be able to hunt by proxy for an individual regardless of where he may have hunted.

Proposal 140. Against. The Board has no authority to establish a guide requirement for moose. Such action should be opposed. The legislature established the species requiring guides and they do not include moose. The Board should not be in the business of providing clients to guides.

Proposal 141. Against.

Proposal 144. Against.

Proposal 146. Against. See response above to 140. Also a guide requirement is not necessary as it is doubtful that a non-resident would hunt this area without a guide.



RECEIVED

JAN 29 2018

BOARDS,  
ANCHORAGE

ADF & G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Submitted by: Brian West  
1000 Oceanview Dr.  
Anchorage, Alaska 99515

February 2018 Central/Southwest Region

### Proposal 166. AGAINST

This proposal appears to be about increasing the number of animals taken from the Fortymile herd. Changing the fall hunt opening to August 10 will have no impact on the number of caribou taken. Currently two of the four zones open Aug 10 and the two road accessible zones open Aug 29. The two highway zones normally close within 48 hours. Start date is not the issue, the issue is herd location relative to the Steese and Taylor Highways. The only way to increase the number of caribou taken is to increase the fall quota. The seasons were changed ~ 10 years ago from Aug 10 to Aug 29 to try and allow for a season that would be open more than a few days and to align closer with the moose season. This has worked in a few of the years. The fall seasons should remain as they are. To increase the number of caribou taken increase the quota. The Fish & Game might also consider a cow only drawing permit and allow successful applicants to still hunt for bulls under a registration permit.



**Wrangell-St. Elias National Park  
Subsistence Resource Commission**

P.O. Box 439  
Mile 106.8 Richardson Hwy.  
Copper Center, AK 99573

November 14, 2017

Ted Spraker, Chair  
Alaska Board of Game  
c/o ADF&G Boards Support  
PO Box 115526  
Juneau, AK 99811-5526

Subject: Comments on proposals for the February 2018 Southwest/Central Meeting

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 26 and 27, 2017. At this meeting, the SRC reviewed several proposals that will be considered at the February 2018 Southwest/Central meeting of the Alaska Board of Game and would like to provide the following comments:

**Proposal 113: Lengthen the trapping season for wolverine in Unit 13**

**Proposal 114: Extend the trapping season for wolverine in Unit 13**

**Proposal 115: Extend the trapping season for wolverine in Units 11 and 13**

These proposals all address wolverine trapping seasons in the Copper Basin. The Wrangell-St. Elias SRC supports these proposals with modification to extend wolverine trapping to the end of February in all of Unit 11 and in Unit 13A, 13C, 13D, and 13E. The commission opposes extending the season in Unit 13B due to the potential for conservation concerns from increased harvests. Unit 13B is more accessible and sees increased snowmachine traffic during February as the weather warms up.

**Proposal 117: Reduce the harvest and possession limits for grouse in Unit 11:** The Wrangell-St. Elias SRC supports Proposal 117 for the reasons stated in the proposal, which the commission submitted.

**Proposal 118: Reduce the bag limit and shorten the season for grouse in Unit 11:** The Wrangell-St. Elias SRC opposes Proposal 118. The commission does not see a need to shorten the season for grouse in Unit 11.

Thank you for the opportunity to comment.

Sincerely,

Daniel E. Stevens  
Chair

Note: Karen Linnell was not present for the SRC's discussion of Board of Game proposals.

Chair: Daniel Stevens; Members: Don Horrell, Gloria Stickwan, Karen Linnell, Jamie Marunde, Raymond Sensmeier, Robert Fithian, Sue Entsminger, and Suzanne McCarthy



Submitted By  
Craig Aglietti  
Submitted On  
1/20/2018 10:18:29 AM  
Affiliation

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Anchorage, Alaska 99502

Please reverse decision to spit up the Unit 13 caribou hunt.



Submitted By  
Nathaniel Buck  
Submitted On  
9/18/2017 2:26:50 PM  
Affiliation

**5 AAC 85.020. Seasons and bag limits for brown bear and for hunting brown bear with the use of bait.**

Proposal: increase the bag limit for brown bear across unit 14A from one bear every four regulatory years to one bear ever year or every regulatory year. Additionally, authorize the taking of brown bears at bait stations within this GMU and for the brown bear season to be extended to June 30th to match the black bear baiting season.

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

The brown bear population is out of control across GMU 14A; from Big Lake to Houston, through Hatcher's Pass and even in the Knik River Basin Brown Bears have become excessively prevalent. This has led to an increased number of human to bear conflict (such as Hatcher's Pass), it has driven black bears into residential areas and forced ADF&G to respond to bear problems (such as in the Butte), it has also created a large safety concern for hunters who hunt black bear with bait as they are unable to shoot brown bears in the area until they feel imminent danger.



Submitted By  
Larry DeBoard  
Submitted On  
11/11/2017 4:32:30 PM  
Affiliation

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Considering the latest herd population estimates of the Fortymile Caribou herd, would you please consider raising the number of caribou permits for YC831 for the 2018 draw? The current number of permits available is 30. I think we could raise that number substantially, at least for Zone 3. Thank you.



Submitted By  
Tamara Harper  
Submitted On  
10/25/2017 6:41:01 PM  
Affiliation  
McCarthy resident

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i think the limit for spruce grouse in unit 11 should be reduced to 5 per day/10 in possession. lots of people are coming from anchorage and hunting in groups on the mccarthy road and they sometimes have 50 birds or more! that's too much impact on our local grouse population and i think they are harvesting them for commercial reasons. 5 a day is plenty for most hunters, especially locals, and it would help maintain a viable population of grouse. 30 grouse in possession per person just encourages people to take too many and probably sell them. please limit the daily take to 5 per person. thank you, tamara harper



Submitted By  
Wally Hickel III  
Submitted On  
1/19/2018 3:58:13 PM  
Affiliation

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Address  
2734 Iliamna  
Anchorage, Alaska 99517

I'm writing to ask you to reverse the decision to divide the hunting times for the Unit 13 Nelchina Caribou hunt RC566 in 2018 and beyond. I understand the reason behind this was to alleviate hunting pressure and "spread out" hunters. I believe this will have an opposite effect and create a bottleneck of hunters into the September timeframe. When faced with the choice, I believe most hunters will choose September because; Labor Day weekend is the most popular time to hunt as most people take advantage of the three day weekend, and they are required to only hunt moose in Unit 13 in September. By limiting the times of this hunt people cannot go on a caribou hunt in August, come up empty, and try again in September. I own property along the Denali Highway across from the campground at Brushkana Creek and Labor Day weekend is always of particular concern because of the increased number of hunters. Over the years I've had break-ins and people camped out by my cabin due to the campground being full on Labor Day weekend. I understand stuff like this happens, but it has the potential to be more prevalent if this bottleneck takes place.

When hunters choose this hunt, they understand the advantages and disadvantages that come with it. The ease of access, guaranteed tag, and six week hunt time are nice. The disadvantages are of course; the crowds, only being allowed to harvest one caribou and requirements to only hunt moose in Unit 13. Now, with the decision to split up the hunt, we are restricted to essentially half the hunt time (three weeks from six weeks).

I respectfully ask that you reverse the decision to split up the hunt and restore it back to the way it was when hunters could choose to go from opening day in August to closing in September.

Regards,

Wally Hickel III



Submitted By  
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Submitted On  
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Sirs:

I got one thing to say. Your denying my wife and me permission to hunt caribou in unit 13 this fall was simply wrong. My wife is an Athabascan native born and raised in Nenana. She is 69 years old and has never taken a caribou. I am 73 years old and have lived in Alaska since 1954 except for the Army and college. I am a veteran. I haven't taken a caribou in over 50 years. We live in North Pole. We wanted to drive down and get a caribou in unit 13 when the season was extended. We were told at the Fairbanks F&G office on College Road that we couldn't legally take a caribou. Furthermore we were told if we get a permit after applying in October for next year we would have to hunt moose in Unit 13 and will not be able to hunt moose in unit 20.

Based on what we learned I talked to our Representative Tammie Wilson and asked her to cut the F&G budget to the bone. She replied that the F&G board doesn't listen to the public and that she and others have had difficulty dealing with them for years.

Yours,

Gerald Newton

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I was hunting unit 13 when the 3 brow tines or 36" was implemented.

The ADF&G said then it was to build a bigger, better herd by increasing the Bull to Cow ratio. In my opinion it works. Then came the 3 brows or 50" then the 4 brows or 50".

This moose season in unit 13 we seen 10 bulls in 9 days. Of the 10 bulls only one was probally over 50" but didn't chance it and one spike.

My understanding if I had 3 community tags, I could of shot three bulls including the one over 50". Out of the 10 bulls we seen, realistically we would of been able to shoot 7

We met a lone community hunter and we were thinking once he harvested his bull he would of been done and leave, but he had two tags.

As for policing , I have passed up a sub legal bull that gets shot a short time afterwards do you call ADF&G? or assume they are community hunters.

I'm trying to understand why the Board would allow community subsistance hunt in area with size restrictions and open the season earlier to boot.

I believe the size restrictions is working. On the amount of brow tines requirements shooting smaller bulls with 4 brows appears to be affecting the geneitics so there are less four brow tine moose.

I have several suggests.

- 1) Stopping the community hunts it size restricted areas.
- 2) Remove the 3 and 4 brow tines out of the equation for determining mature bulls.
- 3) If you believe you must keep a community hunt, then they should start at the same timeas all general hunters and not be allowed to shoot a bull over 50" or four brow tines.

I know the board must make some difficult decisions and can't please everyone.



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9/21/2017 12:30:59 PM  
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Board of Game Members, the purpose of my comment is to provide a suggestion to facilitate a method to assist in promoting the respect for obeying the hunting rules and regulations of Alaska.

Every year I spend considerable time in area 13B before and during the hunting season. I see numerous violations of hunters violating rules and regulations of shooting prohibited animals; not removing the required animal parts; waste of animal meat; violating rules of leaving the trails and driving on the tundra; disobeying the BLM trail markers and traveling on restricted trails.

Where I hunt there is no cell phone coverage and rarely frequented by a Fish and Wildlife Officer. To report violations, I have to break camp and travel to the nearest lodge to report the violation, and then only able to leave a message of the violation because the Officer is unavailable to talk to. By the time Law Enforcement arrives the violater is departed. Without names or vehicle license plate numbers, that violator faces no penalty.

I am a retired Alaska State Trooper and I am aware of other personnel who would be willing to be deputized to issue a citation, write a report, and testify in court. Three Fish and Wildlife Officers (one recovering from surgery and unable to perform his duty), and one additional Federal Park Ranger were the only law enforcement for the vast area 13 hunting area.

State Biologist of Fish and Game enforcement authority is a model of how this special deputizing could be implimented. They write citations, (they don't confiscate weapons or meat), they take pictures, write reports, and testify in court.

Thank you for considering my suggestion.