

## **Glennallen Area – Units 11 & 13**

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**PROPOSAL 91 – 5 AAC 99.025. Customary and traditional uses of fish and game populations.** Modify the amount reasonably necessary for subsistence for caribou and moose in Unit 13 as follows:

I. Conduct a current ADF&G public “Customary and Traditional Use Public Survey” of sport, public personal use, and subsistence users residing in Units 7, 11, 12, 13, 14, 15, 16, and 20, including personal use and subsistence harvest of: (1) all big game including moose, caribou, sheep, goat, and bears; (2) harvests of fresh water and salt water fish including trout, grayling, Dolly Varden, salmon, halibut, cod, red snapper, and rock fish; and (3) small game harvest including spruce grouse, ptarmigan, rabbits, ducks, and geese.

II. Re-calculate the ANS for Unit 13 caribou and moose:

A current public survey of customary and traditional use of Tier-I, sport, personal use, and community subsistence harvest (CSH) subsistence use, is necessary and overdue for the determination of ANS for big game populations, to determine the increased number of subsistence users of fish and game, the current harvest rates, and to determine and update the stocks of fish and game populations that are presently used for subsistence use. AS 16.05.258(b) *et. seq*

**What is the issue you would like the board to address and why?** A current and updated public survey of customary and traditional use is necessary and lawfully required to maintain sustainable use management of fish and game resources, and to protect subsistence use priority benefits of fish and game resources, as well as prior to Board of Game (board) imposing restrictive regulations on bag limits and seasons. 5 AAC 99.010; 5 AAC 92.072(b)(1)-(4); AS 16.05.258(b) *et. seq*

The 2009 board determinations of ANS for Unit 13 caribou was struck down as **arbitrary and capricious** by Judge Bauman in *Manning v. State ADFG, Ahtna*, Case No. 3KN-09-178CI. The board has NOT completed any public survey of “Customary and Traditional Use” after the Judge Bauman decision. Prior to implementing regulation restrictions on harvests of fish and game, the board is required by law to identify customary and traditional uses by **Alaska residents** [i.e., NOT just the Ahtna tribal members]. 5 AAC 99.010(b)(1)-(8). [Note: Nothing in the regulations and statutory enabling authority AS 16.05.258 allow the board to impose limitations and bar the customary and traditional subsistence use based only on Ahtna **racial** customs and traditions, nor grant **racial** permit priority preferences to residents of the eight Ahtna Athabaskan villages, all in violation of Alaska Native Claims Settlement Act (ANCSA) 43 U.S.C. 1601 Section 4b terminating all future aboriginal native priority rights, Alaska Constitution Article VIII Section 3 common use, and U.S. Constitutional 14<sup>th</sup> Amendment equal protections. *Zobel v. Williams, 455, U.S. 55 (1982); McDowell v. State, 785 P.2d 1 (Alaska 1989); and Manning, Id. ]*

**PROPOSED BY:** Kenneth Manning

(HQ-F17-009)

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**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 you 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)  
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**PROPOSAL 93 – 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 92.072. Community subsistence harvest hunt area and permit conditions.** Eliminate the community subsistence harvest hunt for caribou in Unit 13 as follows:

Eliminate the community subsistence harvest caribou hunt in Unit 13.

**What is the issue you would like the board to address and why?** Eliminate the community subsistence harvest caribou hunt in Unit 13. This hunt offers one main advantage over the (other) Tier I caribou hunt in the unit, open designated hunting opportunity amongst group members. If the Unit 13-specific proxy regulations were eliminated, the vast majority of Unit 13 caribou permittees would be able to meet their needs under the existing Tier I caribou hunt in the unit.

**PROPOSED BY:** Rebecca Schwanke (EG-F17-112)  
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**PROPOSAL 94 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions, and 85.025. Hunting seasons and bag limits for caribou.** Eliminate the community subsistence harvest hunt for caribou in Unit 13 as follows:

Eliminate the CSH caribou permit hunt (CC001) for Unit 13. The other Tier I level hunts provides reasonable opportunity for all subsistence needs and general sport hunts for the Copper Basin Nelchina Caribou herd in Unit 13.

Keep the Tier I hunt (RC566) in effect; this will achieve all management objectives needed for the Copper Basin caribou hunting.

**What is the issue you would like the board to address and why?** The harvestable surplus of Nelchina caribou far exceeds the ANS allowing Tier-I-plus level hunts. Thus the CSH hunt is unnecessary, adds confusion and unnecessary administration costs to the regulations, management, and enforcement of Unit 13 caribou hunts.

**PROPOSED BY:** Kenneth Manning (HQ-F17-010)  
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**PROPOSAL 95 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions, and 85.055. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose in Unit 13 as follows:

Eliminate the CSH moose permit hunt (CM001) for Unit 13. The Tier I level hunt provides reasonable opportunity for all subsistence needs and general sport hunts for the Copper Basin Nelchina moose herd.

Keep the Tier I hunt for moose; this will achieve all management objectives needed for the Copper Basin moose hunting.

**What is the issue you would like the board to address and why?** The harvestable surplus of Unit 13 moose exceeds ANS allowing Tier-I-Plus level hunts. Thus the CSH hunt is unnecessary, adds confusion and unnecessary administration costs to the regulations and enforcement. “Reasonable opportunity” for subsistence use does NOT mean unconstitutional **racial** Ahtna “racial C&T” permit priority preferences.

**PROPOSED BY:** Kenneth Manning (HQ-F17-011)  
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**PROPOSAL 96 – 5 AAC 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 hunt for moose in the Copper Basin area, and establish a registration moose hunt for Unit 13 as follows:

Eliminate the community subsistence harvest moose hunt in Unit 13, 11, and a portion of 12.

Establish a new resident registration moose hunt for Unit 13. Season dates would be August 15–31. The bag limit would be one bull per household with antlers less than 50-inches wide, and at least two brow tines on both sides. If a household registers for this moose hunt, no member of the household may hunt moose outside Unit 13 during the regulatory year. Households would register during the November hunt application period.

This bag limit allows for more hunters to participate in the early hunt opportunity, helping meet subsistence needs, without over harvesting the resource. In addition, allow the department to set a quota for this hunt to ensure the resource is not over harvested.

**What is the issue you would like the board to address and why?** Eliminate the community subsistence harvest moose hunt in Unit 13, 11, and a portion of 12 (finalize during the next Region III meeting). This hunt offers a few advantages over other moose hunts in the unit, although the complexity of the hunt is not in the best interest of Unit 13 hunters as a whole or the department. The CSH moose hunt offers open designated hunting opportunity amongst group members, early hunt dates, and a limited number of highly coveted any bull moose permits. The demand for any bull moose permits is extremely high in Unit 13 for all hunters, local and non-local, as seen in the number of CSH participants as well as the number of any bull drawing permit applications. The demand for an early and/or longer moose hunting season is also high in Unit 13. Are these things necessary? No. The Unit 13 Amount Necessary for Subsistence is more than being met by other existing resident hunts in the unit. Are these things coveted by all hunters? Yes.

The CSH moose hunt however has morphed into a complicated and convoluted program that has ballooned out of control. In its most recent form following the March 2017 Board of Game meeting, it is now likely sideways of existing state laws governing allocation of game. For example, the Tier II application process has no place inside an otherwise stated Tier I moose hunt, especially considering the moose harvest far exceeds ANS, and nonresidents are still allowed to hunt in the unit. It is time to let go of the CSH moose hunt in Unit 13, 11, and a portion of 12.

To offer a replacement for the additional hunt opportunity for an any bull moose, consider adopting an early season registration bull hunt similar to the past Tier II hunt dates, August 15–August 31. This time period offers a jump on the general season moose hunters, and moose are not overly susceptible to harvest during this time. To accommodate the number of hunters that will be interested in participating, the bag limit must have an antler restriction. Unfortunately, an any bull registration hunt is just not an option given the hunter interest in this unit.

If the Unit 13-specific proxy regulations were also eliminated, and proxy hunting were again allowed for antler restricted bull moose hunts, the vast majority of Unit 13 moose hunters would be able to meet their needs under the existing general season and drawing hunts in the unit.

**PROPOSED BY:** Rebecca Schwanke (EG-F17-113)  
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**PROPOSAL 97 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.** Remove the requirement for applicants to have specific customary and traditional use patterns for participating in the community subsistence harvest hunts in Unit 13 as follows:

**Eliminate** the regulatory requirement that all applicants for community subsistence hunts (CSH) for Unit 13 caribou and moose, must practice or convert to local Ahtna Athabaskan customs and traditions (C&T) in accordance with board findings #206-170-BOG, and under penalty of \$10,000 fine and one year in jail for CSH permit non-compliance.

**What is the issue you would like the board to address and why?** Eliminate: Requiring all moose and caribou CSH applicants to practice or convert to Ahtna racial C&T imposes an **unconstitutional racial discrimination limitation and bar** to the community subsistence hunt user group. *McDowell v. State*, 785 P.2D1 (Alaska 1989); *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200 (1995) [racial preference is unconstitutional].

Requiring **racial C&T** compliance with **one race customs and traditions (Ahtna C&T)** exceeds and violates all statutory enabling authority of Alaska Statute 16.05.255, regulations of the Board of Game, management requirements, AS 16.05.258 Alaska Subsistence Law, and constitutional equal protections of Alaska Constitution Article I Section 1 equal rights, and Article VIII Section 3 common use; violates Alaska Native Claims Settlement Act (ANCSA) 43 U.S.C. 1601 Section 4b terminating all future aboriginal native priority hunting and fishing rights.

**PROPOSED BY:** Kenneth Manning (HQ-F17-012)  
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*Note: The following proposal requests regulatory changes that are both statewide (see Proposal 56) and specific to the Central/Southwest Region. The board may take action at the November 2017 Statewide Regulations Meeting or defer taking action until the February 2018 Central/Southwest Region Meeting.*

**PROPOSAL 98 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.** Modify the community subsistence harvest permit conditions as follows:

Amend 5 AAC 92.072. Community subsistence hunt area and permit conditions:

Throughout the regulation the term/phrase “a resident of a community or member of a group” is used to define those participating in the community subsistence hunt (CSH). The regulations should be amended to clarify that the CSH is for “communities”, not simply any “group” of individuals who are Alaska residents. The use of the term “group” diminishes the “community” aspect of the hunt. A “group” can be those who only get together over the internet. A “group” can consist of those who only get together once a year for a potluck that includes a dish or two containing a little moose or caribou taken by a member of the group. The use of the term “group” encourages the kind of abuse that has occurred in the CSH. It takes a “community” to practice the community pattern of C&T (customary and traditional) uses that the Board of Game (board) has set as a condition for participating in the hunt for the Copper Basin area (5 AAC 92.074(d)).

Therefore, the term “group” should be stricken from the regulation and replaced when necessary with “community.”

The term “resident” should also be stricken, because a “community” of subsistence users may not all be residing in the same physical location. For example, the community composed of the eight Ahtna villages includes some Alaska residents who do not live in the area, but who continue to hunt, fish and gather subsistence resources in the area and to participate in the Ahtna customary and traditional hunting way of life, including widespread sharing, teaching traditional knowledge and values, potlatches, etc. Therefore, the term “community members” should be uniformly applied throughout the regulation when describing who is eligible to participate in the CSH. The term “residents” should be stricken.

Likewise, when describing the CSH administrator, the term “community administrator” should be used throughout the regulations. The term “group” should be deleted when the regulation references CSH administration.

Additionally amend 5 AAC 92.072. Community subsistence harvest hunt areas as follows:

(a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074. **Prior to issuing a permit and harvest reports for the community hunt area described in 5 AAC 92.074(d), the commissioner or designee shall determine, on the basis of an application form developed by the department, that the community applying for the permit conforms with the definition of “community” set forth in section (i) of this regulation.**

...

(c) If the board has established a community harvest hunt area for a big game population, [RESIDENTS] **members** of the community [OR MEMBERS OF A GROUP] may elect to participate in a community harvest permit hunt in accordance with the following conditions:

(1)(D) make efforts to ensure that the applicable customary and traditional use pattern described by the board and included by the department as a permit condition, if any, is observed by subscribers [INCLUDING MEAT SHARING]; the applicable board finding and conditions will be identified on the permit; this provision does not authorize the community [OR GROUP] administrator to deny subscription to any community [**RESIDENT OR GROUP member who agrees to practice the applicable customary and traditional use pattern as practiced by the community;**]

...

(c)(3) in addition to the requirements of (1) of this subsection, the community [OR GROUP] representative must submit a complete written report, on a form provided by the department, for the community [OR GROUP] participating in the community harvest hunt area described in 5 AAC 92.074(d), that describes efforts by the community [OR GROUP] to observe the customary and traditional use pattern described by board findings for the game populations hunted under the conditions of this community harvest permit; in completing the report, the representative must

make efforts to collect a complete report from each household that is a member of the community [OR GROUP] that describes efforts by the household to observe the customary and traditional use pattern using the eight elements described in this paragraph; a copy of all household reports collected by the community [OR GROUP] representative shall be submitted to the department as a part of the representative's written report; complete reports must include information about efforts to observe the customary and traditional use pattern of the game population, as follows:

(A) Element 1: participation in a long-term, consistent pattern of noncommercial taking, use, and reliance on the game population: the number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and use of areas other than the community subsistence hunt area for harvest activities;

(B) Element 2: participation in the pattern of taking or use of the game population that follows a seasonal use pattern of harvest effort in the hunt area: the months and seasons in which noncommercial harvest activities occur in the hunt area;

(C) Element 3: participation in a pattern of taking or use of wild resources in the hunt area that includes methods and means of harvest characterized by efficiency and economy of effort and cost: costs associated with harvests; and methods used to reduce costs and improve efficiency of harvest; and number of species harvested during hunting activities;

(D) Element 4: participation in a pattern of taking or use of wild resources that occurs in the hunt area due to close ties to the area: number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and variety of harvesting activities that take place in the hunt area; and evidence of other areas used for harvest activities;

(E) Element 5: use of means of processing and preserving wild resources from the hunt area that have been traditionally used by past generations: complete listing of the parts of the harvested game that are used; and preservation methods of that game; and types of foods and other products produced from that harvest;

(F) Element 6: participation in a pattern of taking or use of wild resources from the hunt area that includes the handing down of knowledge of hunting skills, values, and lore about the hunt area from generation to generation: involvement of multiple generations in the taking and use of the game population; and evidence of instruction and training;

(G) Element 7: participation in a pattern of taking of wild resources from the hunt area in which the harvest is shared throughout the community: amount of harvest of the game population that is shared; and evidence of a communal sharing event; and support of those in need through sharing of the harvest of the game population; and

(H) Element 8: participation in a pattern that includes taking, use, and reliance on a wide variety of wild resources from the hunt area: the variety of resource harvest activities engaged in within the hunt area; and evidence of other areas used for harvest activities.

**(c)(4) the department may waive the annual reporting requirement and institute a five-year reporting period for any community which has demonstrated, through reports submitted**

**annually over a five-year period, a high degree of participation in the customary and traditional community use pattern described in board findings for the area.**

...

(f) The department may disapprove an application for a community subsistence harvest permit from a community [OR GROUP] that has previously failed to comply with requirements in (c)(1) and (3) of this section. The failure to **submit a** report by the community [OR GROUP] representative under (c) [(1) AND] (3) of this section **which demonstrates, pursuant to criteria and a scoring system established by the department, that the community is observing the customary and traditional use pattern described by board findings for the game populations hunted under the conditions of this community harvest permit shall** [MAY] result in denial of a community subsistence harvest permit for the area during the following **two** regulatory years **for all members of the community.** The department must allow a representative the opportunity to request a hearing if the representative fails to submit a complete report as required under (c)(1) and (3) of this section. A community [OR GROUP] aggrieved by a decision under this subsection will be granted a hearing before the commissioner or the commissioner's designee, if the community [OR GROUP] representative or **a member of the community** makes a request for a hearing in writing to the commissioner within 60 days after **receiving notice from the department that the community will be denied a community subsistence harvest permit for the following year.** [THE CONCLUSION OF THE HUNT FOR WHICH THE PERSON FAILED TO PROVIDE A REPORT]. The commissioner may determine that the penalty provided under this subsection will not be applied if the community [OR GROUP] representative **or member** provides the information required on the report **sufficient to satisfy the department's requirements** and if the commissioner determines that

(1) the failure to provide the report was the result of unavoidable circumstance; or

(2) extreme hardship would result to the community [OR GROUP] **or member.**

...

(h) Nothing in this section authorizes the department to delegate to a community [OR GROUP] representative determination of the lawful criteria for selecting who may hunt, for establishing any special restrictions for the hunt and for the handling of game, and for establishing the terms and conditions for a meaningful communal sharing of game taken under a community harvest permit, **except that a community representative shall require participating community members to observe the customary and traditional use pattern described by board findings for the game populations hunted as that pattern of use is practiced by the community.**

...

(i) In this section,

(2) a "community" [OR "GROUP"] is "a group **of 25 or more individuals** [OF PEOPLE] linked by a common interest in, and participation in **a consistent pattern of noncommercial taking, use, and reliance on a wide diversity of subsistence resources in** [,] an **identified** area [AND THE WILDLIFE POPULATIONS IN THAT AREA,] that **provides substantial economic, cultural or social, and nutritional elements of the subsistence way of life of the community**



**and its members** [IS CONSISTENT WITH THE CUSTOMARY AND TRADITIONAL USE PATTERN OF THAT WILDLIFE POPULATION AND AREA AS DEFINED BY THE BOARD].

**What is the issue you would like the board to address and why?** This proposal: 1) amends the regulation to delete the terms “group” and “residents” and replaces these terms with the term “community” and “members”; 2) amends the authority of the Department of Fish and Game (department) to issue community-based subsistence harvest permits and harvest reports for the Copper Basin area (5 AAC 92.074(d)) to require the department to create an application form that establishes that the applicant is a “community” as that term is defined in the regulation; 3) amends the definition of “community” to make it clear that groups applying for and participating in the CSH share a common interest and participation in the pattern of C&T community use identified by the board for wildlife resources in that area and which provides substantial economic, cultural or social, and nutritional elements of the subsistence way of life of the community and its members; 4) requires the department to develop and apply a scoring system for annual reports from CSH administrators for the CSH in the area described in 5 AAC 92.074(d), and to disqualify a community and all members of the community for two years from participating in a CSH in this area if the annual report fails to satisfy the minimum score developed by the department for demonstrating that a community is observing the community pattern of subsistence use that is a condition of the permit for the area; 5) allows the department to waive the annual CSH administrator reporting requirement for the area described in 5 AAC 92.074(d) if a community has established a solid record of practicing the applicable C&T pattern of use, and replace it with a report once every five years; and 6) allows a CSH administrator to require all members of the CSH community to observe the C&T pattern of use recognized by the board in establishing the CSH, including specific practices of the community that are consistent with the pattern of use recognized by the board.

**PROPOSED BY:** Ahtna Tene Nene’ (HQ-F17-026)  
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**PROPOSAL 99 – 5 AAC 92.050(a)(4)(I). Required permit hunt conditions and procedures.** Remove the requirement that Unit 13 Tier I caribou hunters, community subsistence harvest (CSH) moose and caribou hunters, and all members of their household, shall hunt moose only in Unit 13 as follows:

**Eliminate** the requirement for Unit 13 Tier I caribou hunters and all applicants for CSH caribou and moose hunts, and everyone in their household, are required to hunt moose only in Unit 13.

**What is the issue you would like the board to address and why?** Moose harvest numbers will continue to be reduced while the regulation of “coupling” requiring all caribou Tier I and CSH hunters, and all members of their household, shall hunt moose only in Unit 13. This “coupling” is a major factor of increasing the overcrowded moose and caribou hunters in Unit 13. The Department of Fish and Game promoting overcrowded moose hunters is not enabling reasonable opportunity for subsistence use for moose harvest in Unit 13, and denies the rights of Unit 13 hunters to hunt moose in other long-time traditional and customary subsistence moose hunting areas of the state.

**PROPOSED BY:** Kenneth Manning (HQ-F17-013)  
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**PROPOSAL 100 – 5 AAC 92.050(a)(4)(I). Required permit hunt conditions and procedures.** Remove the requirement for Unit 13 Tier I caribou hunters to hunt moose in Unit 13 as follows:

Remove Unit 13 Tier I caribou requirement to hunt moose in Unit 13.

**What is the issue you would like the board to address and why?** Remove the Unit 13 Tier I caribou requirement to hunt moose in Unit 13. This requirement was originally put in thinking that less people would choose to hunt caribou in Unit 13 if they had to hunt moose there also. We think this requirement that we originally supported backfired and now there are more folks hunting moose because of this requirement. As the number of Tier I caribou permits increase to now 8,500 permits, we have 8,500 people who now have to hunt their moose in Unit 13 and can't hunt in another unit.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee (EG-F17-038)  
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*Note: The Board of Game deferred this proposal as amended from the 2017 Special Meeting on Copper Basin Area Moose and Caribou Hunting. It was previously numbered Proposal 37. The amended proposal applies only to establishing a youth hunt, August 1–5, for caribou in Unit 13.*

**PROPOSAL 101 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Establish a youth hunting season for caribou in Unit 13 as follows:

~~Some ways to solve this problem would be to extend the season from August 10—March 31 with no closing time.~~

~~Allow a two caribou bag limit for the time frame of October 1—March 31. This would give more of an incentive for hunters to hunt the winter season and not during the season when moose is open at the same time.~~

Another suggestion would be to open a youth hunt from August 1–~~5~~ 20 which would allow families to be able to give the youths a chance to hunt when the Denali Highway isn't saturated with other hunters. This would also be during a time when the youth aren't in school so they would be given more incentive to hunt early.

**What is the issue you would like the board to address and why?** I am very concerned about the numbers of hunters on the Denali Highway at the same time. The Denali Highway allows for easy hunting with highway access for hunting of caribou and other game. This then brings a huge safety issue with hunters shooting over other hunters. The whole unit has become more and more saturated over the last three years. The issue comes from the high caribou tags given with Tier I and Tier II over the last few years, community harvest and general harvest all hunting the fall all at the same time.

Another issue is that many kids are being denied the chance to hunt on the Denali Highway. Parents are either not bringing their children or ending their hunts early due to this safety. Many friends voiced their concerns with their children being in an area where hunters are shooting over other hunters. This then discourages our next generation of hunters! The Denali Highway is a great place to bring children since it is an easy area to hunt with lots of support in case there is a need for lodging and food.

**PROPOSED BY:** Jennifer Bondy (EG-F16-121)  
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**PROPOSAL 102 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Open a nonresident caribou hunting season in Unit 13 and allocate up to ten percent of drawing permits to nonresidents when population objectives are met as follows:

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

(a)(8) Unit 13

Resident and **Nonresident** hunters: August 20 – September 20 and October 21 – March 31

One caribou every regulatory year by drawing permit; up to 5,000 permits may be issued. **Up to ten percent of drawing permits may be issued to nonresident hunters when the herd is within or above the population objective.**

**What is the issue you would like the board to address and why?** Provide for a nonresident caribou hunting opportunity in Unit 13 as follows:

Nonresident caribou hunting opportunity has been absent in the Nelchina herd even though the management objectives have been exceeded for several years and the ANS is being met by several fold.

I would like the board to allocate ten percent of the current drawing tags to nonresident hunters when the Nelchina Herd is within population objectives. This would have been around 2.5% of the total opportunity this last year (2016-17).

If the Unit 13 moose drawing hunts are any indication, 90% or more of these tags will go to hunters that accompany resident Alaskans or hunt on their own. Many of them are military, stationed here but not yet residents, others that have moved to Alaska in the last 12 months, and family and friends of resident hunters. Guided hunters are also a small portion, around five percent in the moose drawings.

**PROPOSED BY:** Aaron Bloomquist (EG-F17-094)  
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**PROPOSAL 103 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the community subsistence harvest hunt season dates for moose to align to align with the general hunt as follows:

Align the season dates for the CSH moose season and the general moose hunt season: September 1 through September 20.

**What is the issue you would like the board to address and why?** Change season dates for the community subsistence moose hunt. By removing this early opener from the CSH and aligning the season date with the general season would level the playing field for all Alaskans, and possibly remove some of the interest in the current CSH.

**PROPOSED BY:** Anchorage Fish and Game Advisory Committee (HQ-F17-016)  
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**PROPOSAL 104 – 5 AAC 85.045(11). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 13 as follows:

<b>Units and Bag Limits (11)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 13 1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf	Oct. 1–Oct. 31 Mar. 1–Mar. 31 (General hunt only)	No open season
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within objectives.

This Unit 13 antlerless hunt was initially adopted in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. The hunt was modified when the board adopted an October and March season during the February 2013 board meeting.

Since the inception of this hunt, the Department of Fish and Game (department) has issued ten permits annually for a hunt in Unit 13A. The department intentionally limited the number of permits issued annually to gain public support for the hunt, even though a higher rate of cow harvest was desirable to regulate the moose population within objectives. After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue a sufficient number of permits to allow the harvest of up to one percent of the cow population, when the moose population is above the midpoint of the population objective for the subunit.

Moose have generally increased at an average rate of 3% per year in the intensive wolf management area during the past ten years. The current population objective for Unit 13A is 3,500–4,200, and the population was estimated to be above objective in 2015 and 2016. The number of cows in western Unit 13A is expected to continue increasing, and the antlerless hunt in western Unit 13A is necessary to slow the growth of this population and to keep it within the intensive management objectives. The additional harvest provided by the hunt will also assist in achieving the harvest objectives for the population. No additional antlerless opportunities in other portions of Unit 13 are recommended at this time.

If this antlerless moose hunting opportunity is not reauthorized in Unit 13, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F17-033)  
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**PROPOSAL 105 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the antlerless moose hunt in Unit 13 as follows:

[R] [13] [ONE ANTLERLESS MOOSE BY PERMIT. HOWEVER, NO PERSON MAY TAKE A CALF OR COW ACCOMPANIED BY A CALF] [DM325] [OCT.1–OCT.31] [MAR.1–MAR.31]

**What is the issue you would like the board to address and why?** End DM325. Do not remove ten cow moose from a herd being managed by antler restrictions. There is no biology supporting this hunt

**PROPOSED BY:** John Raich (EG-F17-085)  
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**PROPOSAL 106 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the drawing permit hunt DM324 for moose in Unit 13 as follows:

[R] [13] [ONE BULL MOOSE BY PERMIT] [DM324] [SEPT.1–SEPT.20]

**What is the issue you would like the board to address and why?** End the DM324 hunt. Do not remove these five bulls from a herd of moose being managed by antler restrictions. There is no biology supporting this hunt.

**PROPOSED BY:** John Raich (EG-F17-084)  
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**PROPOSAL 107 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a late resident hunting season for moose in Units 11 and 13 as follows:

Amend resident moose hunting seasons in Units 11 and 13 by adding a late season any bull registration hunt.

Retain all other existing seasons and bag limits.

New Late Season Registration Permit Hunt(s): The late season registration moose hunt(s) will have a bag limit of any bull and run November 15–30. Registration permits will be issued in Unit 13 communities starting November 13. The hunt(s) will be offered in Units 11 and 13 as follows:

- Remainder of Unit 11. Issue up to ten permits.
- Unit13A west: Issue up to ten permits.
- Remainder of Unit13A: Issue up to 20 permits.
- Unit 13B: Issue up to 20 permits.
- Unit 13C: Issue up to 50 permits.
- Unit 13D: Issue up to 50 permits.
- Unit 13E: Issue up to 50 permits.

Hunters should be limited to one late season registration moose permit per season within Units 11 and 13.

**Permits will ONLY be issued if bull/cow ratios exceed the management objective by more than five bulls/100 cows in three consecutive years. Some of the subunits listed above would not have permits issued in the foreseeable future due to lower bull:cow ratios. Unit 13A west would likely never have permits issued.**

These hunts will provide an opportunity for subsistence moose hunting for all Alaskan hunters on under-harvested moose populations.

The two week November registration hunt offers a “second chance” for those not successful during the general season. This early winter time frame allows for travel into some areas that are normally un-hunted during the fall due to open water (supported by continually high bull:cow ratios in some areas). It also offers family hunting opportunity over the Thanksgiving holiday. While we recognize there will be post-rut concentrations of moose in higher elevations, the limited number of permits for these areas will reduce harassment and keep harvest sustainable.

High “UP TO” permit numbers are offered to allow flexibility in times of high moose numbers and annual conditions that may be less than ideal. Some years when freeze-up conditions are very poor the entire allowable number of permits may be necessary to take a few moose.

Conservative registration permit numbers should be set for areas with heavy fall hunting pressure given current bull:cow ratios such as in Unit 13B and the western portion of Unit 13A. Moderate permit numbers can be set for Units 13C, 13D and 13E considering much of the moose habitat in these areas is inaccessible during the fall and thus lightly hunted. Continually high bull:cow ratios and increasing moose numbers in these areas suggest additional harvest will be sustainable. In the case of Unit 13E there will also be some bulls migrating out of park areas that are otherwise closed to state hunters, becoming available to state subsistence hunters for the first time.

Given existing proxy regulations, late season registration hunters will be able to proxy hunt for others, but only once per season within Unit 13.

Regulations to be amended by adding the following to current regulations:

5 AAC 85.045. Hunting seasons and bag limits for moose

(9)

Unit 11, that portion east of the east bank of the Copper River upstream from and including the Slana River drainage

**1 bull by registration permit Nov. 15–Nov. 30**

**Available in local communities**

**Nov. 13–Nov. 30**

**Up to 10 permits may be issued**

(11)

Units and Bag Limits

Unit 13

**1 bull, by [Dec. 1–Dec. 31]**

**registration Nov. 15–Nov. 30**

**permit only as follows:**

**Unit 13A west of the Lake Louise**

**Road, Lake Louise, Susitna Lake,**

**Tyone Lake, and the Tyone River.**

**Permits available in local communities**

**Nov. 13–Nov. 30**

**Up to 10 permits may be issued**

**Unit 13A east of the Lake Louise Road, Lake Louise, Susitna Lake, Tyone Lake, and the Tyone River, Permits available in local communities Nov. 13–Nov. 30 Up to 20 permits may be issued**

**Unit 13B Permits available in local communities Nov. 13–Nov. 30 Up to 20 permits may be issued**

**Unit 13C Permits available in local communities Nov. 13–Nov. 30 Up to 50 permits may be issued**

**Remainder of Unit 13D Permits available in local communities Nov. 13–Nov. 30 Up to 50 permits may be issued**

**Unit 13E Permits available in local communities Nov. 13–Nov. 30 Up to 50 permits may be issued**

**What is the issue you would like the board to address and why?** Units 13 and 11, although heavily used by the public in some areas, have certain areas where moose are not accessible during the regular seasons. I would like the Board of Game to adopt regulations to provide an opportunity to harvest moose in these areas where bull:cow ratios are high and additional harvest will be sustainable.

**PROPOSED BY:** Aaron Bloomquist (EG-F17-081)  
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**PROPOSAL 108** – 5 AAC 85.045. **Hunting seasons and bag limits for moose.** Change the antler restrictions for moose in Unit 13 as follows:

R 13 One bull with spike-fork or 50-inch antlers or antlers with 3 [4] or more brow tines on at least one side. HT September 1 – September 20.

**What is the issue you would like the board to address and why?** Amend antler restriction rule in Unit 13 from four brow tines to three brow tines. There are dozens of bulls with a 48-inch antler spread and two or three brow tines. Twenty years ago adult bulls had brow palms. Antler restrictions removed them before breeding season.



**PROPOSED BY:** John Raich

(EG-F17-087)

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**PROPOSAL 109 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Change the “any ram” bag limit to “full-curl ram” for the Dall sheep permit hunts in Units 13D and 14A as follows:

Change the legal animal of harvest to a full-curl ram for these existing draw hunts:

- |                         |                             |
|-------------------------|-----------------------------|
| Subunit 13D West        | Subunit 14A Friday Creek    |
| DS 160                  | DS 180                      |
| DS 260                  | DS 185                      |
|                         | DS 280                      |
| Subunit 14A Metal Creek | DS 285                      |
| DS 170                  |                             |
| DS 175                  | Subunit 14A Carpenter Creek |
| DS 270                  | DS 190                      |
| DS 275                  | DS 195                      |
|                         | DS 290                      |
|                         | DS 295                      |

**What is the issue you would like the board to address and why?** Any ram hunts cost the Department of Fish and Game (department) more money to manage and necessitate fewer tags. Any ram hunts have the potential for higher impact on sheep populations, so they require more intensive management by the department to prevent over utilization. The high impact of any ram hunts leads the department to lower the number of tags awarded in order to maintain a sustainable harvest. The result of changing any ram hunts to full-curl hunts would be saving both department funds and staff time. Additionally, it would allow more hunters to participate in these coveted draw hunts.

**PROPOSED BY:** Brett Barringer

(EG-F17-007)

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**PROPOSAL 110 – 5 AAC 85.040. Hunting seasons and bag limits for goat.** Change the drawing permit hunt for goat in Unit 13D to a registration hunt as follows:

Unit 13D remainder: One goat by registration permit.....August 10 – November 30

**What is the issue you would like the board to address and why?** Eliminate the Unit 13D remainder drawing hunt for goat and make it a registration hunt. This area is a walk-in only area hunt. A registration hunt will allow people who really want to go into this area and know what they are getting into to be able to get a tag and hunt the area. Some folks are drawing the tag and not using it once they find out how hard and area it is to get in to.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee

(EG-F17-037)

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**PROPOSAL 111 – 5 AAC 85.015. Hunting seasons and bag limits for black bear; 85.020. Hunting seasons and bag limits for brown bear; and 92.044. Permit for hunting bear with the use of bait or scent lures.** Open a fall season for hunting brown bear and black bear over bait in Unit 13 as follows:

Brown bear and black bear may be taken over bait in Unit 13 from April 15 to June 30 **and from August 20 to October 15** except that portion of Unit 13E that is Denali State Park. **Hunting brown bear over bait from August 20 to October 15 will be by registration permit only. This hunt may be closed by emergency order if a harvest goal is met.**

**What is the issue you would like the board to address and why?** I am proposing a fall bear baiting season in Unit 13 for both brown and black bears. There is a very high population of both brown and black bear in Unit 13 that are under-harvested because most of this unit is very remote and hard to access and a lot of it is heavily timbered. Many hunters who bait in the spring in this area report seeing five to ten bears on every bait station in this area. I would like to see a higher utilization of this game resource. The Department of Fish and Game (department) has put video cameras on some brown bear in this area and some bears were observed killing or at least eating up to forty different moose and caribou in a very short period of time. Most of them calves. The Board of Game (board) has watched some of these videos. It can't hurt to take a few more of these bears. The board failed a similar proposal in February of 2015 that would have allowed fall baiting in Subunit 13D for fear of over-harvest of brown bear. I have personally been baiting bears in the spring in this unit since 2014 and have found brown bears to be very smart and cautious around bait stations and almost always approach from far down wind. They are not easy to harvest this way. They are nothing like the bold and care free black bears. I have also baited brown bear in Unit 16 in the fall and found them to be the same in the fall there, with most coming in after dark. There is a two brown bear bag limit in Unit 16 and there has not been a dramatically high brown bear harvest in this area, only a moderate one and the baiting season in Unit 16 runs from April 15 to October 15. I think there is almost no chance of over-harvest of brown bear on this hunt. Just to be cautious, I propose this hunt to be a registration hunt so the department can keep better track of the number of hunters in the field and the total number of bears taken this way. If the department are really concerned about over-harvest they could even put a harvest goal on it and close the season by emergency order if it is met.

**PROPOSED BY:** Dan Montgomery (EG-F17-068)  
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**PROPOSAL 112 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Lengthen the hunting season for brown bear in Unit 11 as follows:

Unit 11 brown/grizzly bear season: August 10 – June 30.

**What is the issue you would like the board to address and why?** Extend the brown/grizzly bear season to June 30 in Unit 11.

More closely align the season with similar adjoining areas. Example: Unit 12 brown bear season ends June 30, and Unit 13 has no closed season.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee (EG-F17-032)  
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**PROPOSAL 113 – 5 AAC 84.270. Furbearer trapping.** Lengthen the trapping season for wolverine in Unit 13 as follows:

Extend wolverine season in Unit 13 to February 28.

**What is the issue you would like the board to address and why?** The Denali Fish and Game Advisory Committee believes that there is an abundant population of wolverine and there are very few individuals trapping wolverine in Unit 13. By extending the season, this will allow for more opportunity to increase the participation of trapping in Unit 13. In addition, this will align the wolverine season with red fox, lynx, marten, mink and weasel. Due to wolf season ending on April 30, by extending wolverine season, this would further help prevent the trapper turning over the wolverine to law enforcement due to incidental catch in a wolf trap.

**PROPOSED BY:** Denali Fish and Game Advisory Committee (HQ-F17-003)  
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**PROPOSAL 114 – 5 AAC 84.270. Furbearer trapping.** Extend the trapping season for wolverine in Unit 13 as follows:

Change the dates for the wolverine trapping season in Unit 13 from November 10 to January 31 to **November 10 to February 28 annually.**

**What is the issue you would like the board to address and why?** Early closure date to wolverine trapping season in Unit 13 (January 31). The season would align with Unit 20 and others if it was extended to February 28. Access would be much improved with more daylight, possibly warmer temperature and better snow conditions. Much of Unit 13 is very remote and this additional time opportunity would not have a significant negative effect on wolverine populations. The current closure date for wolverine trapping season in Unit 13 unnecessarily restricts opportunity.

**PROPOSED BY:** John Basile (EG-F17-035)  
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**PROPOSAL 115 – 5 AAC 84.270. Furbearer trapping.** Extend the trapping season for wolverine in Units 11 and 13 as follows:

Wolverine trapping season in Units 11 and 13.....November 10 – February 28.....no limit

**What is the issue you would like the board to address and why?** Extend wolverine trapping season to the end of February in Units 11 and 13. It currently ends the end of January.

Provide a longer opportunity to take wolverine. It will cut down on incidental take when trapping other species.

It would more closely align with other trapping seasons within these units. Example: Wolf and coyote seasons go until the end of March in Unit 11 and the end of April in Unit 13. Lynx and fox both go until the end of February in both units. Adjoining Units 20A and Unit 6 wolverine season goes until February 28 and Unit 12 goes until March 15.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee (EG-F17-031)  
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**PROPOSAL 116 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**  
Allow trappers the incidental take of two furbearer in Units 11 and 13 as follows:

Either:

"Allow two (2) total incidental furbearer catch by trapping per licensed trapper per year for any species that have a "no limit" bag limit. The incidental closed season catch must have been taken in traps set for a species that still has an open season.

Or:

"If a trapper incidentally takes a furbearer during a closed season in a trap that is set for a furbearer species that is still open, the Department of Fish and Game may issue a total of two (2) incidental take tags per licensed trapper per year only for species that have a "no limit" bag limit. The trapper must report these within 30 days to ADF&G for tagging, and sealing if required. The trapper may then keep the incidentally taken furbearer.

**What is the issue you would like the board to address and why?** Allow two total incidental furbearer catch by trapping per licensed trapper per year. If all seasons are not aligned, there will be some incidental take of the closed species in traps set for species that are still open. You would still need to report to ADF&G within 30 days of take to get animal sealed or otherwise checked in.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee (EG-F17-046)  
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**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.**

**What is the issue you would like the board to address and why?** Reduce the harvest and possession limits for grouse in Unit 11. For several years, the Wrangell-St. Elias National Park Subsistence Resource Commission has been hearing about large groups of hunters from outside the area taking advantage of the current liberal bag limits and harvesting large numbers of grouse along the McCarthy and Nabesna Roads within Wrangell-St. Elias National Preserve. For example, a group of four to six hunters hunting for a couple of days could each harvest 30 each, or a total of 120 to 180 grouse. We are concerned about the potential for these high harvest levels

to impact the grouse populations, especially during years when recruitment is poor, and believe that reducing the harvest and possession limits would help to address this issue. We are fortunate that good conditions in recent springs have resulted in substantial numbers of birds, however, we will eventually go back to wet springs with less recruitment. Additionally, the lynx population is on the upswing, and they will also have an impact on grouse populations. The smaller harvest and possession limits on ruffed grouse is proposed because they are just coming into this area and limited in number.

**PROPOSED BY:** Wrangell-St. Elias National Park Subsistence Resource Commission (EG-F17-013)

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**PROPOSAL 118 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Reduce the bag limit and shorten the season for grouse in Unit 11 as follows:

A daily bag limit of five grouse per day, with a possession limit of ten; September 1 – December 15.

**What is the issue you would like the board to address and why?** Modify the hunting season and bag limits for grouse (Spruce Hens) in Unit 11 as follows: We propose that the season be shortened and open September 1 instead of August 10 so that the young birds have more time to develop before being hunted. The reason for this is that the population of Alaska is changing and the hunting pressure is increasing from folks who drive out to hunt from Anchorage and other urban areas.

**PROPOSED BY:** Howard Mozen and George Vue Yang (EG-F17-024)

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

Units 13A, B, C, D, E.....August 10 – March 31

**What is the issue you would like the board to address and why?** Extend ptarmigan season in Unit 13B to March 31. The advisory committee agreed several years ago that as an experiment we wanted to try a shorter season to see if that would help the rock ptarmigan population. It didn't seem to help. Willow ptarmigan numbers are up and we are missing the opportunity to hunt willow ptarmigan later in the season in Unit 13B, which encompasses a very large area and a lot of hunting area and opportunity is lost.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee (EG-F17-036)

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**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 as follows:

Align Unit 13E and 13B ptarmigan season by changing season dates to August 10 through January 31, and reduce harvest limit to five a day and possession limit of ten total.

**What is the issue you would like the board to address and why?** The Denali Fish and Game Advisory Committee feels that the population of ptarmigan has decreased from historical levels. The ptarmigan population decrease over the years has been caused from many factors but a major factor is from springtime recreation users along the corridors of the Denali Highway and popular recreation areas in Units 13E and 13B. Shortening the season will decrease the vulnerability of springtime ptarmigan. Decreasing the bag limit will help prevent overharvest. Aligning season dates will simplify enforcement and assist hunters with date compliance between areas. Despite the decreased opportunity to harvest, this could help repopulation the ptarmigan and in future, reinstitute previous bag limits with higher limits and longer seasons.

**PROPOSED BY:** Denali Fish and Game Advisory Committee (HQ-F17-002)  
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**PROPOSAL 121 – 5 AAC 85.065(3). Hunting seasons and bag limits for small game.** Lengthen the hunting season for ptarmigan in Unit 13B as follows:

Return the ptarmigan season length in Subunit 13B to the standard August 10 – March 31, aligning the subunit with surrounding units.

**What is the issue you would like the board to address and why?** The length of the ptarmigan season in Subunit 13B was reduced a number of years ago in an attempt to achieve higher rock ptarmigan numbers at calling stations located along the eastern Denali Highway. The late winter season was eliminated (December 1 – March 31), in hopes of reducing additive mortality. The change has not been successful in bringing rock ptarmigan numbers back up to previous highs. Meanwhile, with the natural swing in upland bird numbers, willow ptarmigan are now abundant in the subunit and surrounding areas. A significant amount of winter and spring upland bird hunting could be provided if the season was returned to the standard length August 10 – March 31. Given the popularity and accessibility of this area for ptarmigan hunting, the change would also take pressure off surrounding subunits.

**PROPOSED BY:** Rebecca Schwanke (EG-F17-109)  
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**PROPOSAL 122 – 5 AAC 92.540 Controlled Use Areas.** Modify the Sourdough Controlled Use Area as follows:

**5 AAC 92.540(3)(B)(ii)**

...

the area is closed to the use of any motorized vehicle for hunting, including the transportation of hunters, their hunting gear, or parts of game; however, this provision does not prohibit motorized access, or transportation of game, on the Richardson Highway, **Gulkana River, Sourdough Creek Campground or boat launch**, Sourdough and Haggard Creeks, Middle Fork and Haggard Creek trails, or other trails designated by the department.

...

**What is the issue you would like the board to address and why?** The Sourdough Controlled Use Area was created in 1971 to provide moose and caribou hunting opportunities for individuals without off-road vehicles (ORVs). As competition increased for moose and caribou in the late 1960s, it became evident that there was a substantial demand for areas to hunt without having to compete with ORVs. The Sourdough Controlled Use Area provides a large hunting area accessible from the Richardson Highway where moose and caribou can be found in fair numbers and roadside or non-motorized hunters have reasonable chance for success. The Sourdough CUA was not intended to restrict hunter access to or on the Gulkana River. This proposal will clarify the legality of motorized use and access for the Sourdough Campground and the adjacent public boat launch.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F17-040)

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**PROPOSAL 123 – 5 AAC 92.540(3)(C)(i). Controlled Use Areas.** Modify the Clearwater Creek Controlled Use Area description as follows:

...

(C) Clearwater Creek Controlled Use Area:

(i) the area consists of that portion of Unit 13(B) north of Denali Highway, west of and including **the Maclaren Summit trail and** the Maclaren River drainage, and east of, and including eastern bank drainages of the Middle Fork of the Susitna River downstream from and including the Susitna Glacier, and the eastern bank drainages of Susitna River downstream from its confluence with the Middle Fork

...

**What is the issue you would like the board to address and why?** The Clearwater Creek Controlled Use Area (CCUA) is closed to the use of any motorized vehicle for hunting, including the transportation of hunters, their hunting gear, or parts of game, except for brown/grizzly bears, wolves, and small game from March 15 through June 30. The area provides a large hunting area, accessible from the Denali Highway, where roadside and non-motorized hunters have a reasonable opportunity to harvest moose and caribou. Recently there has been some confusion by the public regarding the location of the Maclaren Summit Trail relative to the eastern boundary of the CCUA. Recent GIS analysis conducted by the Alaska Department of Natural Resources and the Alaska Department of Fish and Game has identified that the trailhead and the majority of the Maclaren Summit Trail lies within the Maclaren River drainage and the controlled use area.

Adding the Maclaren Summit Trail to the Clearwater Creek Controlled Use area description further refines the description, and should help alleviate public confusion.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F17-041)  
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**PROPOSAL 124 – 5 AAC 92.011. Taking of game by proxy.** Eliminate the Unit 13-specific proxy requirements as follows:

Eliminate all Unit 13-specific proxy regulations.

**What is the issue you would like the board to address and why?** Eliminate all Unit 13-specific proxy regulations. The current regulation that limits proxy hunting to once per season per species in Unit 13 limits an Alaskan cultural tradition of harvesting big game for family and friends that need assistance. Often a young hunter is willing and able to harvest big game for more than one individual that qualifies for a proxy. Utilization of the original proxy regulations in this manner was essential to providing elders and other individuals with wild game in Unit 13. Without this opportunity, many have turned to the community hunt structure where open designated hunting is allowed amongst a group.

Additionally, eliminate the Unit 13 requirement that only Tier II caribou hunters can proxy for other Tier II caribou hunters. Currently there is no Tier II caribou hunt in Unit 13. Even should it come back, this regulation should not be in place. Most often young hunters willing and able to hunt for Tier II permittees are not Tier II permit holders themselves.

**PROPOSED BY:** Rebecca Schwanke (EG-F17-111)  
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