



## Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION  
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An Agenda Change Request (ACR 2) has been submitted to the Alaska Board of Game requesting to change 5 AAC 92.050(a)(4)(F) and (G), required permit hunt conditions and procedures. The proponent is asking the board to allow 2020 moose drawing permits for DM892 in Unit 24D remainder to be used in 2021 or allow the 2020 permit holders to apply for DM892 in 2021.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is unaware of any error in regulation.
- B. The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.
- C. The department does not believe that there is a biological concern that is caused by existing regulations.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f).
- E. The department is unaware of any unexpected resource situations that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action.

Existing regulations are as follows:

### **5 AAC 92.050(a)(4). Required permit hunt conditions and procedures.**

(4) permit issuance:

- (F) An individual who is a successful applicant for a specific drawing permit hunt is ineligible to apply for a permit for that specific hunt the following year;
- (G) an individual who is a successful applicant for a Koyukuk Controlled Use Area moose drawing permit is ineligible to apply for a Koyukuk Controlled Use Area moose drawing permit the following year.

In June 2020, the board considered similar proposals that were submitted as ACRs to provide bear hunting opportunity to hunters who were unable to hunt in the spring of 2020 due to COVID-related restrictions. A synopsis of board actions from this meeting include:

- Opening a spring 2021 brown bear registration hunt in Game Management Unit 9.

- Providing resident brown bear hunters in Unit 8 with the opportunity to use their drawing permits in spring 2022.
- Providing nonresident brown bear hunters in Unit 8 the opportunity to use their drawing permits in spring 2021.
- Providing nonresident black bear hunters in Southeast the opportunity to use their drawing permits in spring 2022.
- Providing nonresident brown bear hunters in Unit 22 the opportunity to use their drawing permits in spring 2021

However, the board declined to take action on bear drawing hunts in Units 14C and 26B: these seasons remained unchanged because most hunters were able to participate earlier in the regulatory year.

When the board met in June to deliberate transferring spring 2020 bear hunts, it was very clear that the actions taken for spring 2020 hunts would not be taken for fall 2020 hunts. It is also important to note the action the board took was in direct response to the State of Alaska closing all nonresident bear hunts in spring 2020. Board action resulted in the department transferring approximately 600 nonresident bear hunting permits, which resulted in a significant increase in workload for staff in multiple divisions. The need to spread hunters out and not damage the populations or overcrowd hunt areas means that management of the transfers will continue to spring 2022.

The department is aware of similar circumstances, as the ACR outlines, across the state for many species. Absent a specific reason to treat DM892 permit holders differently from other drawing permit holders, there may be a legal need, should the board accept this, to broaden the scope of the ACR to address all fall 2020 drawing hunts. In regulatory year 2019 drawing permits amounted to an estimated 8,450 individual permits (resident and nonresident). Transferring this number of permits and that associated manpower to manage the permits would result in a significant increase in workload and interfere with wildlife and hunt management activities.

The next regularly scheduled board meeting for Unit 24 regulations is during winter/spring of 2022/2023. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2021 meeting in Fairbanks to allow for more public input.

Sincerely,



Eddie Grasser  
Director  
Division of Wildlife Conservation