



Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION
Headquarters

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An Agenda Change Request (ACR 2) has been submitted by Justin Horton to the Alaska Board of Game requesting to change 5 AAC 85.045(a)(20) Hunting seasons and bag limit for moose. The proponent is asking the board to convert nonresident registration moose hunt RM855 to a drawing hunt, retain the current bag limit, issue permits equal to available harvest, require a hunter/guide contract, and establish an alternate hunter list.

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 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 situation that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action.

Nonresident registration moose hunt RM855 (hunt area Unit 22E) was adopted by the Board of Game in 2015 and administered during RY2015 to RY2021. Hunt administration for RM855 includes an annual harvest quota, issuance of an unlimited number of permits, and a bag limit of one bull with antlers greater than 50" or 4 or more brow tines on at least one side, during RY2015 to RY2019. Access to Unit 22E is difficult and 86% of nonresident hunters used guide services between RY2015 and RY2019. Historically, participation by guide outfitters was limited and emergency order closures weren't needed to close seasons before published hunting season dates (September 1-September 14).

The quota for RM855 was 9 bulls during RY2020. The number of guide outfitters operating in the area increased during the same time period and as a result the harvest increased, which in turn resulted in emergency order season closure on September 8 to ensure a sustainable harvest level. Hunters harvested 13 bulls during the RY2020 hunting season.

The Department altered RM855 hunt conditions during RY2021 by issuing 10 permits (available online at hunt.alaska.gov) to ensure sustainable harvest and prevent the issuance of an emergency order season closure that would reduce season length and hunting opportunity.

The department received several complaints from hunters and outfitters about the process for issuing permits on a first come first served basis using the online permitting system. The majority of the complaints centered around issues navigating the system, not receiving a permit, and a belief that some applicants may have an unfair advantage when applying for permits. In total 10 permits were issued, 8 permit holders reported hunting, and 7 were successful.

The need to limit the overall number of permits available for the RM855 registration permit hunt was not anticipated when it was first established in 2015 because of the limited number of guide outfitters operating in the area. Increases in the number of guide outfitters in RY2020 resulted in an unforeseen effect on the administration of the RM855 hunt, requiring that future hunts be administered with a limited number of permits. Administering the hunt as a draw permit may provide clarity to non-resident hunters about permit availability and issuance.

The next regularly scheduled board meeting for Unit 22 regulations is during winter/spring of 2023/2024.

If the board accepts this ACR, the department recommends the proposal come before the board at its March 2022 meeting in Fairbanks to allow for more public input.

Sincerely,



Ryan Scott
Assistant Director
Division of Wildlife Conservation