

# Dillingham Area Proposals – Unit 17

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## PROPOSAL 12

### 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(15)		
Unit 17(A)		
Up to 2 moose per regulatory year, only as follows:		
<b>RESIDENT HUNTERS:</b>		
1 moose by registration permit only; or	Aug. 25–Sept. 25 (Subsistence hunt only)	
1 antlered bull by registration permit; during the period Dec. 1–Last day of Feb. a season of up to 31 days may be announced by emergency order; or	Winter Season to be announced by emergency order (Subsistence hunt only)	
1 antlerless moose by registration permit; during the period Dec. 1–Last day of Feb. a season of up to 31 days may be announced by emergency order;	Winter Season to be announced by emergency order (Subsistence hunt only)	
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**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 board adopted an antlerless moose hunt in Unit 17A in support of the Unit 17A Moose Management Plan, which was modified during a meeting of the Unit 17A Moose Management Planning Group in December 2012. The planning group consists of entities interested in the management of this moose population and includes representatives from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game.

According to the third goal of the revised Unit 17A Moose Management Plan, antlerless moose hunting opportunity can be offered when the population is above 600 moose and increasing. The revised plan also recommends that when the population exceeds 1,200 moose a bag limit of up to two moose is established. Based on the most recent survey with good conditions in March 2017, both conditions have been met with a population estimate of 1,990 moose  $\pm 437$ . The bag limit of two moose and antlerless harvest opportunity provides a mechanism to limit population growth and allows hunters to harvest surplus animals.

The moose population in subunit 17A is growing and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-067)  
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**PROPOSAL 13**

**5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.**

Increase the number of nonresident draw hunt permits and extend the nonresident season by 10 days in Unit 17A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 17(A)		
Up to 2 moose per regulatory year, only as follows:		
<b>RESIDENT HUNTERS:</b>		
1 moose by regulatory permit only, or	Aug. 25–Sept. 25 (Subsistence hunt only)	
1 antlered bull by registration permit; during the period Dec. 1–Last day of Feb. a season of up to 31 days may be announced by emergency order; or	Winter season to be announced by emergency order (Subsistence hunt only)	
1 antlerless moose by registration permit; during the period Dec. 1–Last day of Feb. a season of up to 31 days may	Winter season to be announced by emergency order (Subsistence hunt only)	

be announced by emergency order;

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to [50] **100** permits may be issued.

Sept. 5–[Sept 15] **Sept. 25**

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**What is the issue you would like the board to address and why?** Based on the most recent population survey in March of 2017 the point estimate was 1,990 moose ±437 in Unit 17A. The management objectives are to maintain a population of 1,100-1,700 moose. The moose population in Unit 17A is growing and can sustain additional harvest, and winter hunt quotas have rarely been met in the last four years. Out of concern for over-browsing which would impact the quality and quantity of forage available for moose in Unit 17A, additional harvest opportunities are warranted by extending the nonresident hunting season by 10 days and increasing the “up to” number of permits from 50 to 100.

Management objectives for this population recognize the importance of this population expanding into neighboring areas to provide additional harvest opportunities. This population is likely responsible in part to the recent growth of adjacent populations, particularly in the north and west. With the already long and liberal resident season the department recommends the board consider additional nonresident opportunity.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-073)

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**PROPOSAL 14**

**5AAC 85.045(15). Hunting seasons and bag limits for moose.**

Establish fixed-season dates for resident registration moose hunts RM575 & RM576 in Unit 17A as follows:

<b>Units and Bag Limits (15)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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Unit 17(A)

Up to 2 moose per regulatory

year, only as follows:

RESIDENT HUNTERS:

1 moose by registration permit only; or Aug. 25—Sept.25  
(Subsistence hunt only)

1 antlered bull by registration permit; [DURING THE PERIOD JAN.1—LAST DAY OF FEB. A SEASON UP TO 31 DAYS MAY BE ANNOUNCED BY EMERGENCY ORDER;] or **Jan.1—Last day of Feb.**  
[WINTER SEASON TO BE ANNOUNCED BY EMERGENCY ORDER]  
(Subsistence hunt only)

1 antlerless bull by registration Permit; [DURING THE PERIOD DEC.1—LAST DAY OF FEB. A SEASON UP TO 31 DAYS MAY BE ANNOUNCED BY EMERGENCY ORDER;] **Jan.1—Last day of Feb.**  
[WINTER SEASON TO BE ANNOUNCED BY EMERGENCY ORDER]  
(Subsistence hunt only)

NONRESIDENT HUNTERS:

No open season.

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 50 permits may be issued Sept. 5—Sept. 15

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**What is the issue you would like the board to address and why?** The Unit 17A moose population is above population objective (N=2,370). Unit 17A provides quality moose habitat that supports a robust moose population. Based on this fact, the 2013 Moose Management group established a population objective of 800–1,200 moose to prevent the population from increasing to numbers above what the landscape can support. The Alaska Department of Fish and Game (ADF&G) relies on both.

Registration hunts RM575 and RM576 were created by the Board of Game in 2011 with the intent of targeting one antlerless bull and one antlered bull. These hunts are opened by emergency order (EO) each year and may only be extended up to 31 days by EO to target weather conditions suitable for travel. Since 2012 this hunt has been extended by EO every year except the 2015/2016 winter season because poor winter travelling conditions have prevented users from accessing moose in the first 31-day period. Given that the Unit 17A population continues to remain above objectives, ADF&G recommends continuing to administer these hunts by registration permit but with a set season of January 1 to the last day of February providing up to a 60-day season. The hunts will continue to be closed by EO when the established harvest quota is reached. This hunt structure

allows hunters the flexibility to engage in hunting activities as soon as conditions are appropriate, for longer periods and to facilitate our ability to bring this population within objectives.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-050)

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**PROPOSAL 15**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a registration hunt for bull moose limited to resident certified bowhunters only within Unit 17B as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on September 16 and closing on September 25 or by emergency order. This hunt would be for residents only and subject to the same bag limit and reporting requirements as outlined for RM583. RM583 is an existing hunt that is open to any weapon for residents only from August 20 to September 15 in Units 17B and 17C.

This new registration hunt would be for the entirety of Unit 17B only.

The purpose of this new hunt being a registration hunt would be so that the Department of Fish and Game (ADF&G) can monitor the participation and success rates more closely.

The purpose of the season being September 16 to September 25 would be so not to conflict with already existing hunts in the unit while at the same time not extending beyond normal moose seasons in surrounding areas.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more resident hunters the opportunity to spend time in the field pursuing moose within Unit 17B without having a negative impact on the resource. According to ADF&G, 699 moose were harvested in Unit 17B from 2009 to 2018. According to the ADF&G Dillingham office, only 7 of the 699 moose harvested were reported taken with archery equipment. These reported harvests with bow and arrow account for 1% of all moose taken in Unit 17B over a 10-year period, showing an extremely low impact to moose populations. There is only one other registration hunt for moose in the entire state of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADF&G. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations. Having a registration hunt rather than extending the general season would allow ADF&G to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises. Lastly, having a season that does not extend beyond September 25 would mirror most other moose season end dates in the surrounding units. The ADF&G biologist responsible for this area believes that current moose populations in Unit 17B can sustain this proposed hunt given that it would be restricted to certified bowhunters only.

**PROPOSED BY:** Mike Harris (EG-F20-041)

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**PROPOSAL 16**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a registration hunt for bull moose open to nonresident certified bowhunters only within Unit 17B, remainder as follows:

Institute a registration hunt open to nonresident certified bowhunters only with season dates starting on September 16 and closing on September 25 or by emergency order. Number of permits and harvest reporting requirements would be set by the Department of Fish and Game (ADF&G). This hunt for nonresidents would be subject to the of the same antler restrictions and hunter orientation requirements as outlined in all other Unit 17 nonresident hunts. Currently, all nonresident hunters in Unit 17 may only harvest bull moose with 50-inch antlers or antlers with four or more brow tines on at least one side. Nonresidents are also required to complete a nonresident orientation prior to hunting moose in Unit 17.

This new registration hunt would be for the entirety of Unit 17B, remainder only.

The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely.

The purpose of the season being September 16 to September 25 would be so not to conflict with already existing hunts in the Unit while at the same time not extending beyond normal moose seasons in surrounding areas.

Having an additional hunt open to nonresidents would bring in more revenue to the State of Alaska as well as to local communities.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 17B without having a negative impact on the resource. According to ADF&G, 699 moose were harvested in Unit 17B from 2009 to 2018. According to the ADF&G Dillingham office, only 7 of the 699 moose harvested were reported taken with archery equipment. These reported harvests with bow and arrow account for 1% of all moose taken in Unit 17B over a 10-year period, showing the extremely low impact to moose populations. There is only one other registration hunt for moose in the entire State of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADF&G. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations. Having a registration hunt rather than extending the general season would allow the department to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises. Having a season that does not extend beyond September 25 would mirror most other moose season end dates in the surrounding units. The ADF&G biologist responsible for this area believes that current moose populations in Unit 17B can sustain this proposed hunt given that it would be restricted to certified bowhunters only. Lastly, having an additional hunt open to nonresidents would give the opportunity for guides to sell additional hunts to certified bowhunters, therefore, bringing in more revenue to the State of Alaska as well as to local communities.

**PROPOSED BY:** Mike Harris (EG-F20-042)

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## **PROPOSAL 17**

### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish a registration hunt for bull moose limited to certified bowhunters only within Unit 17B as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on September 16 and closing on September 25 or by emergency order. This hunt would be for residents and nonresidents. Residents would be subject to the same bag limit and reporting requirements as outlined for RM583. RM583 is an existing hunt that is open to any weapon for residents only from August 20 to September 15 in Units 17B and 17C.

Nonresidents would be subject to the same antler restrictions and hunter orientation requirements as outlined in all other Unit 17 nonresident hunts. Currently, all nonresident hunters in Unit 17 may only harvest bull moose with 50-inch antlers or antlers with four or more brow tines on at least one side. Nonresidents are also required to complete a nonresident orientation prior to hunting moose in Unit 17. Number of permits and would be set by the Department of Fish and Game (ADF&G).

Registration would be available online or in person at ADF&G offices.

This new registration hunt would be for the entirety of Unit 17B only.

The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely.

The purpose of the season being September 16 to September 25 would be so not to conflict with already existing hunts in the unit while at the same time not extending beyond normal moose seasons in surrounding areas.

Having an additional hunt open to nonresidents would bring in more revenue to the state of Alaska as well as to local communities.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 17B without having a negative impact on the resource. According to ADF&G, 699 moose were harvested in Unit 17B from 2009 to 2018. According to the ADF&G Dillingham office, only 7 of the 699 moose harvested were reported taken with archery equipment. These reported harvests with bow and arrow account for 1% of all moose taken in Unit 17B over a 10-year period, showing an extremely low impact to moose populations. There is only one other registration hunt for moose in the entire State of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADFG. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations. Having a registration hunt rather than extending the general season would allow the department to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises. Having a season that does not

extend beyond September 25 would mirror most other moose season end dates in the surrounding units. Lastly, having an additional hunt open to nonresidents would give the opportunity for guides to sell additional hunts to certified bowhunters, therefore, bringing in more revenue to the state of Alaska as well as to local communities.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F20-055)  
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**PROPOSAL 18**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Extend the resident winter moose season in Units 17B and 17C as follows:

5 AAC 95.045. Hunting seasons and bag limits for moose. Add hunting season for moose in Units 17B and 17C as follows:

Unit 17B remainder: One antlered bull by permit available in person in Dillingham beginning October 25 and Nushagak River Villages.

RM585: December 1 – January 31 Nushagak River Drainage.

Unit 17C: One antlered bull by permit available in person in Dillingham beginning October 25 and Nushagak River villages.

RM585 December 1 - January 31 Nushagak River Drainage.

**What is the issue you would like the board to address and why?** Extend the resident open season for the winter moose hunt in the Nushagak River Drainage in Units 17B and 17C in order to increase hunter opportunity in the area. Alaska has warmed up about 2.5 degrees Fahrenheit compared to about 1.5 degrees Fahrenheit for the contiguous United States as a whole. Most of the warming has occurred in the winter and spring seasons (NOAA). Lack of snow and late freeze up of the Nushagak River conditions have limit hunting during the scheduled one-month open season in December. Only a few hunters participated in the hazardous conditions with a few moose harvested. Climate change has affected the warmer winter conditions in 2019 and will continue into the future. With lack of snow and dangerous ice conditions, hunters had little access to traditional hunting areas, and predators had also scattered game close to villages. The extended season will allow hunters to safely travel with sufficient snow cover and river freeze up.

**PROPOSED BY:** Moxie Andrew Jr. (EG-F20-061)  
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*Note: The range of the Mulchatna caribou herd is Units 9 and 17 in the Central & Southwest Region; Unit 18 for the Western Arctic/Western Region; and Unit 19 for the Interior and Eastern Arctic Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

## **PROPOSAL 19**

### **5 AAC 92.108. Identified big game prey populations and objectives.**

Establish new population and harvest objectives for the Mulchatna caribou herd in Units 9, 17, 18, and 19 as follows:

We recommend establishing new population and harvest objectives after a habitat assessment has been performed to determine the current ecological potential of the range to support caribou and additional analysis of causes of mortality including harvest.

<b>Population Caribou Herds</b>	<b>Finding</b>	<b>Population</b>	<b>Harvest</b>
Adak	Negative		
Beaver Mountain	Negative		
Central Arctic	Positive	28,000 - 32,000	1,400 - 1,600
Chisana	Negative		
Delta	Negative		
Denali	Negative		
Farewell/Big River	Negative		
Fortymile	Positive	50,000 - 100,000	1,000 - 15,000
Galena Mountain	Negative		
Kenai Lowlands	Negative		
Kenai Mountains	Negative		
Killey River, Fox River, And Twin Lakes	Negative		
Macomb	Positive	600 - 800	30 - 50
Mentasta	Negative		
Mulchatna	Positive	<b><u>To be determined</u></b> [30,000 – 80,000	2,400 – 8,000]
Nelchina	Positive	35,000 - 40,000	3,000- 6,000
Northern Alaska Peninsula	Positive	6,000 - 15,000	600 - 1,500
Nushagak Peninsula	Negative		
Porcupine	Positive	100,000 - 150,000	1,500 - 2,000
Rainy Pass	Negative		
Ray Mountain	Negative		
Southern Alaska Peninsula	Positive	1,500 - 4,000	150 - 200
Sunshine Mountain	Negative		
Teshekpuk	Positive	15,000 - 28,000	900 - 2,800
Tonzona	Negative		
Unimak Island Western Arctic	Positive	at least 200,000	12,000-20,000
White Mountain	Negative		
Wolf Mountain	Negative		

**What is the issue you would like the board to address and why?** The Mulchatna caribou herd has changed continuously from the time monitoring began, increasing from an estimated 14,000 in 1974 to 200,000 in 1996, then decreasing to 13,500 in 2019. A population objective of 25,000 was initially established in 1987, and since then revised multiple times. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then. The 2019 population estimate was 13,500, less than half of the minimum of the objective range.

The multiple revisions in objectives over time have been a sensible approach to management of a changing resource. We are requesting that the Board of Game review the Intensive Management population and harvest objectives with the goal of adjusting objectives to an ecologically sustainable level. We recommend this review include careful consideration of habitat quality, which almost certainly has changed in response to caribou grazing, reducing population potential.

**PROPOSED BY:** Togiak National Wildlife Refuge (HQ-F20-030)  
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*Note: The range of the Mulchatna caribou herd is Units 9 and 17 in the Central & Southwest Region; Unit 18 for the Western Arctic/Western Region; and Unit 19 for the Interior and Eastern Arctic Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 20**

**5 AAC 85.025 (3)(4)(12)(13)(14). Hunting seasons and bag limits for caribou.**

**5 AAC 92.062. Priority for subsistence hunting; Tier II permits.**

Establish Tier II subsistence hunting season and bag limit for the Mulchatna caribou herd (MCH) as follows:

The proposed structure would replace the existing RC503 permit across the entire range of the MCH with a Tier II subsistence hunting structure providing up to 5,000 permits, a bag limit of one caribou, and updated season dates in Units 9A, 18, 19A, and 19B from August 1 to September 30 and November 15 to March 15, providing a break during the rut. The season in Units 9B, 9C, and 17 would continue to extend until March 30. No nonresident opportunity would be provided.

**What is the issue you would like the board to address and why?** The current harvest strategy across the range of the Mulchatna caribou herd (MCH) is administered under registration caribou permit RC503 which allows up to two caribou. In Units 9A, 9C (within the Alagnak River drainage), 18, 19A and 19B, the season runs from August 1 to March 15. In Units 9B, 9C (the portion of north of the north bank of the Naknek River and south of the Alagnak River drainage) and 17, the season is 15 days longer, from August 1 to March 31.

Additional caribou seasons in these units are available for residents targeting the Northern Alaska and Southern Alaska Peninsula herds in Units 9C and 9E (TC505) and for residents and nonresidents in Unit 9D (harvest ticket). Registration permit RC501 provides resident opportunity on the Nushagak Peninsula caribou herd in portions of Units 17A and 17C. Both residents and nonresidents can also hunt caribou in Units 19C and 19D under a general season harvest ticket.

According to 5 AAC 92.062, when nonsubsistence uses of a game population have been eliminated and the taking of game must be further restricted to ensure that the population is maintained and managed on a sustained yield basis, or to ensure the continuation of subsistence uses of the population, hunting permits must be issued and allocated under the Tier II system. The MCH has been in decline since the late 1990s and has failed to stabilize. Over the course of the last 5–10 years, the MCH has not met intensive management goals or the amount reasonably necessary for subsistence, which is 2,100 to 2,400 caribou (ANS). There has been no nonresident harvest of this herd since the 2000s, and bag limits on this herd have consistently remained reduced for residents. The herd’s decline to an estimated 13,500 caribou in 2019 initiated another range-wide bag limit reduction followed by an early closure of the RC503 hunt.

In addition to establishing a Tier II harvest structure, we propose a) changing the hunt season to exclude harvest during the rut so that animals can breed without the additional pressure exerted on the herd by hunters, and b) standardizing the season across most of the MCH range to reduce hunter confusion and encourage reporting.

**PROPOSED BY:** The Alaska Department of Fish and Game (HQ-F20-060)

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*Note: The range of the Mulchatna caribou herd is Units 9 and 17 in the Central & Southwest Region; Unit 18 for the Western Arctic/Western Region; and Unit 19 for the Interior and Eastern Arctic Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

## **PROPOSAL 21**

### **5 AAC 92.111. Intensive Management Plans I.**

Establish a second predation control area for Mulchatna caribou on federal lands in Game Management Units 17 and 18.

**What is the issue you would like the board to address and why?** The Mulchatna Caribou Herd Predation Management Area is established to increase the Mulchatna caribou herd (MCH) within Units 9B, 17B, 17C, 19A and 19B to aid in achieving intensive management (IM) objectives. The Mulchatna Caribou Herd Predation Management Area encompasses approximately 39,683 square miles (multiple predator control areas may be utilized within the management area); however, the current active control areas is limited to a total of 10,000 square miles, which is 25 percent of the management area.

The current control program was first established by the Board of Game (board) in 2011 for wolf control. It is designed to increase the caribou herd’s population size and human harvest by reducing wolf predation on caribou and is expected to contribute to achieving the IM objectives across the range. The IM objective for the MCH as established in 5 AAC 92.108 is 30,000–80,000 caribou. These objectives were based on historical information regarding population numbers, habitat limitations, human use, and sustainable harvests. The caribou harvest objective established for the MCH is 2,400–8,000.

Wolves are a major predator of caribou in the range of the MCH and are an important factor in failing to achieve objectives. The wolf population objective for the MCH Predation Management Area is to annually reduce the number of wolves in predator control areas to a level that results in increased calf survival and recruitment. A reduction of wolf predation can reasonably be expected to aid in achieving objectives using recognized, prudent active management techniques based on scientific information.

The population and harvest objectives for the MCH are still well below the IM objectives throughout the herd's range and state and federal hunts have been affected, resulting in bag limit changes and an early closure to the 2019/2020 season. It is still believed that reducing wolf predation is likely effective and that reducing wolf predation is in the best interests of subsistence users. Under 5 AAC 99.025, in 1988, the board made a positive customary and traditional use (C&T) finding for caribou in Units 9A, 9B, 17, and 18, with an amount reasonably necessary for subsistence (ANS) of 2,100– 2,400 caribou. To date, the program has been affected by the limitations of flying and tracking conditions and hampered to a degree by an inability to reduce predation on large portions of federal land where much of the MCH range. In winter 2020 the Secretary of the Interior communicated to the Commissioner of the Alaska Department of Fish and Game (department) that the Division of Wildlife Conservation should draft a plan for predation control on federal lands in Units 17 and 18 to address the declining caribou population. This proposal seeks to establish additional predation control area(s) by expanding the current authorized limit of 10,000 mi<sup>2</sup> for implementation on federal lands (Togiak National Wildlife Refuge).

This proposal requires concurrence from the Department of Interior for implementation on federal lands. The department anticipates this approval prior to the Board of Game meeting in January 2021.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-052)  
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## **PROPOSAL 22**

### **5 AAC 99.025. Customary and traditional uses of game populations.**

Determine customary and traditional uses of the Nushagak Peninsula caribou herd in Game Management Units 17A and 17C – Nushagak Peninsula, Bristol Bay.

**What is the issue you would like the board to address and why?** Under AS 16.05.258, the Board of Game (board) is required to identify game populations, or portions of populations, that are customarily and traditionally taken or used for subsistence. Under 5 AAC 99.025, in 1988, the board made a positive customary and traditional use (C&T) finding for caribou in Units 9A, 9B, 17, and 18, with an amount reasonably necessary for subsistence (ANS) of 2,100– 2,400 caribou. Generally, the Board of Game makes C&T findings for specific caribou herds. In early 1988, most caribou taken in Unit 17 were from the Mulchatna caribou herd (MCH). Therefore, the information provided to the board in support of the positive C&T determination generally addressed uses specific to the MCH. Since 1988, however, two distinct caribou populations have been present in Unit 17: the MCH and the Nushagak Peninsula caribou herd (NPCH). A customary and traditional

use finding specific to the NPCH herd has not been made. The department is proposing the board make a C&T determination specifically for the NPCH.

Following the C&T determination for caribou in Unit 17, caribou were reintroduced to the Nushagak Peninsula to provide additional caribou hunting opportunities. The NPCH primarily occupies the approximately 425 square mile Nushagak Peninsula, which is the portion of Units 17A and 17C south of the Igushik River, the Tuklung River, and the Tuklung Hills, and west to Tvativak Bay. Prior to 2016, caribou hunting on the Nushagak Peninsula was limited to federally-qualified subsistence users under permit FC1702. In 2016, an area within the Nushagak Peninsula was opened to hunters using the state RC501 permit to increase harvest and lower the population of the Nushagak Peninsula herd, which had exceeded population objectives. With a reported harvest of 378 caribou during the 2016–2017 season, and 100 caribou during the 2017–2018 season, the population estimate declined from 1,294 in 2016 to 822 in 2019. The NPCH is now closer to the optimum level of 750.

The Department of Fish and Game (department) will prepare a report with information relevant to the eight criteria (5 AAC 99.010) that the board uses to identify game populations with customary and traditional uses, to assist the board with this finding.

If the board chooses to make a positive C&T finding for the Nushagak Peninsula caribou herd, the department will also provide options for the board to consider establishing an ANS.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-034)  
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### **PROPOSAL 23**

#### **5 AAC 92.080(4)(B)(vii). Unlawful methods of taking game; exceptions.**

Allow the use of snowmachine to position wolf or wolverine for harvest in Unit 17 as follows:

On page 18 of the hunting regulations book, it would read: “A snowmachine may be used to position a wolf or wolverine for harvest, and a wolf or wolverine may be shot from a stationary snowmachine in Units 17, 18, 22, 23, and 26A.”

In 5AAC 92.080(4)(B)(vii) it would read “in Units 17 and 18, a snowmachine may be used to position a wolf or wolverine for harvest, and wolves or wolverines may be shot from a stationary snowmachine;”

**What is the issue you would like the board to address and why?** Currently, the restrictions against driving, herding, harassing, or molesting game, in the accepted allowance for the use of snowmachines to position hunters to select individual wolves, and the absence of wolverines in the accepted allowance for snow machine positioning, conflicts with the long standing local, wolf and wolverine hunting practices which is the only practical way to hunt wolves, and wolverines in Unit 17 during the winter. Also, the allowance for snowmachine use to position a hunter does not satisfactorily address this issue, as it does not clarify whether this includes actually tracking down wolves, or wolverine, including pursuing animals, until close enough to shoot. This proposal

simply seeks to provide Unit 17 hunters and trappers the same opportunities currently available in Units 18, 22, 23, and 26A.

If the Board of Game does not change the regulation, local people hunting these species with snowmachines will continue to live with the threat of prosecution for hunting with snowmachines in the only way practical, making people feel like criminals and interfering with the ability to freely pursue these animals for critical and irreplaceable fur products and income. These animals are critical to the local economy and way of life and enforcement of current regulations is viewed as insensitive to the culture, economy and food security in the region.

Allowing a hunter to use a snowmachine to get within range of fleeing wolves, and wolverines will allow the precise shot placement which will minimize unnecessary waste of fur and is the most humane method of killing an animal with a rifle. Wildlife enforcement officers will also have a clear understanding of the intent to allow for the pursuit of these species, reducing unnecessary conflicts and increasing the cooperation of the people on the other enforcement issues where local cooperation is necessary to the mission to protect all species in the areas.

The local people will appreciate the Board of Game and the Department of Fish and Game being responsive to the needs of the people and by correcting this issue will put integrity back in the system by getting rid of a longstanding conflict between regulatory prohibitions and common local practices that are the only practical way to pursue these species in the winter. In addition, the future cooperative management strategies and goals will be more likely to succeed as the people will have increased faith that the system takes their needs into account and is responsive to them.

**PROPOSED BY:** Nushagak Fish and Game Advisory Committee (HQ-F20-031)  
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**PROPOSAL 24**

**5 AAC 85.065. Hunting seasons and bag limits for small game.**

**5 AAC 92.220. Salvage of game meat, furs, and hides.**

Establish a season, daily and seasonal bag limit, and salvage requirement for Alaska hare in Unit 17 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(2)		
Snowshoe and Alaska hares		
Units 1–5	Sept. 1 – Apr. 30	Sept. 1 – Apr. 30
Units 6–26, except	No closed season	No closed season

14(A) and 14(C) and  
Alaska hares in Units 9,  
**17**, 18, 22, and 23  
No limit

Unit 9 and **17**,  
Alaska hares only  
1 per day, 4 total

Nov. 1 – Jan. 30

Nov. 1 – Jan. 30

Unit 18, 22, and 23, Alaska hares only  
2 per day, 6 total

Unit 14(A)  
5 per day

No closed season  
(General hunt only)

No closed season

Unit 14(C)  
5 per day

Day after Labor Day–  
April. 30  
(General hunt only)

Day after Labor Day–  
Apr. 30

**5 AAC 92.220. Salvage of game meat, furs, and hides.**

(a) Subject to additional requirements in 5 AAC 84-5AAC 85, a person taking game shall salvage the following parts for human use:

...

(7) the hide or meat of Alaska hares taken in Units 9, **17**, 18, 22, and 23;

**What is the issue you would like the board to address and why?** Currently there are season dates, daily and annual bag limit, and salvage requirement for Alaska hare throughout the species range in Alaska (Units 9, 18, 22, and 23) except Unit 17. Given the ongoing research, continued low abundance, and public concern about this species it is important to consider a cohesive and comprehensive management framework for this species across the entire range within Alaska. Many rural residents have reported seeing far fewer Alaska hares in the past 1-2 decades throughout their local areas, and reconnaissance of Alaska hares by ADF&G staff in Unit 17 have yielded few observations. The Board of Game has made positive customary and traditional use findings for Alaska hares throughout their range in Alaska.

The current Alaska hare salvage requirement is described as human use. We recommend this categorization also be used in Unit 17. The human use requirement would be met as long as some portion of the carcass is used for human consumption, trapping, sewing, dog training, dog food, etc. This proposal would simply prohibit the harvest of an Alaska hare with no attempt to recover, eat, or in any way attempt to use part or all of the carcass. Trappers would be allowed to use a whole or portion of a carcass for trapping bait.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F20-037)

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**PROPOSAL 200**

**5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(15)		
Unit 17(A)		
Up to 2 moose per regulatory year only as follows:		
<b>RESIDENT HUNTERS:</b>		
1 moose by registration permit only; or	Aug. 25–Sept. 25 (Subsistence hunt only)	
1 antlered bull by registration permit; during the period Dec. 1 –Last day of Feb. a season of up to 31 days may be announced by emergency order; or	Winter Season to be Announced by Emergency Order (Subsistence hunt only)	
1 antlerless moose by registration permit; during the period Dec. 1 –Last day of Feb. a season of up to 31 days may be announced by emergency order;	Winter Season to be Announced by Emergency Order (Subsistence hunt only)	

...

**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. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The board adopted an antlerless moose hunt in 2013 after hearing much comments from heavily invested groups such as

the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, and the Togiak National Wildlife Refuge.

The Unit 17A moose management plan calls for antlerless moose hunting opportunity when the population is above 600 moose and increasing. When the population exceeds 1,200 moose, a bag limit of up to two moose is needed to provide increased opportunity and to reduce moose abundance to protect habitat. Based on the most recent survey with good conditions in March 2017, both conditions have been met with a population estimate of 1,990  $\pm$ 437 moose. After further analyses, this estimate will be corrected for sightability which will result in a higher population estimate further supporting liberal harvest strategies. The bag limit of two moose and antlerless harvest opportunity provides a mechanism to limit population growth and allows hunters to harvest surplus animals.

The moose population in Unit 17A is growing and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F21-029)

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## **PROPOSAL 201**

### **5 AAC 92.540. Controlled use areas.**

Allow motorized vehicles for hunting moose and caribou in the Upper Mulchatna Controlled Use Area in Unit 17B as follows:

#### **5 AAC 92.540(5)**

(A) the Upper Mulchatna Controlled Use Area:

(i) the area consists of Unit 17(B);

(ii) the area is closed to the use any motorized vehicles for **guided hunters hunting** big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1, except that the use of an aircraft or a boat is not prohibited, and a motorized vehicle in a legally permitted hunting camp is not prohibited;

**(iii) hunters with a RM 583 or RC 503 permit may use motorized vehicles no bigger than 1800 lbs to hunt big game in the Upper Mulchatna Controlled Use area: from August 1 through November 1.**

**What is the issue you would like the board to address and why?** Access to the area is closed to big game motorized hunting. Resident hunters can access the same area with motorized vehicles for small game, waterfowl and berries but if they see a moose or caribou hunters are not allowed to harvest big game. Only hunters who have access to planes can hunt off the river corridor which discriminates against subsistence gatherers, handicapped, and resident hunters. Subsistence hunters on a RM583 or a RC503 who live on the river don't have the resources to hunt by airplane.

**PROPOSED BY:** Richard King (HQ-F21-014)

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**PROPOSAL 202**

**5 AAC 92.095(3). Unlawful methods of taking furbearers; exceptions.**

Allow the use of a firearm to take beaver while trapping in Unit 17 as follows:

We would recommend that the regulation be changed to read like most of the western units in the state that:

A firearm is allowed to take beaver during the season within the bag limits that are established in regulations.

In this case, at this time for Unit 17 it would mean all season with no limits

**What is the issue you would like the board to address and why?** Unit 17 has some of the most complex regulations for beaver in the state. We would like to see the regulations cleaned up for simplicity for both the trappers and law enforcement.

Currently a person cannot use a firearm to take beaver from October 10- November 30. Then on December 1 until April 14 a firearm can be used to take an unlimited amount of beaver. Then on April 15 until May 31 a firearm may be used to take up to two beaver a day that must be used for human consumption.

As you can see, this is very complex. How law enforcement can determine that a particular beaver was shot at one time of the year, and not another so it's illegal to use as bait but must be consumed is beyond us.

We can currently trap as many beaver in a day as we want the entire season. The use of a firearm as a method of take will simply help achieve the goal of securing a few additional beaver for fur, food, or bait. Some people worry that this will lead to the demise of the beaver but our personal experience in hunting beaver has shown us that really shooting more than three or four in a day would be a major undertaking with a lot of luck. This is due to the limited amount of time beaver are actually out of their huts and available to take with a firearm.

**PROPOSED BY:** Todd Fritze and Kenton Moos (EG-F21-025)

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**PROPOSAL 203**

**5 AAC 84.270. Furbearer trapping.**

Extend the trapping season for muskrat in Unit 17 as follows:

I would propose that the muskrat season be changed to mirror the beaver season in the spring so they can be taken simultaneously making it more efficient and effective for trappers. The new regulations would be as follows:

Muskrat

**November 10 - May 31** [NOVEMBER 20 - MARCH 31]

**What is the issue you would like the board to address and why?** The season for muskrats in Unit 17 is currently November 10 - March 31. This gives us a very limited amount of time to trap muskrats some years, and virtually no time without drilling through substantial amounts of ice most years. During the majority of this season muskrats are under the ice and hard for trappers to find in any volume.

There are plenty of muskrats in Unit 17 but they are generally available to trap ice free in the spring April and May months. Extending the season to mirror the beaver season would give trappers added opportunity to take muskrats along with beaver. Unit 17 is one of the few units in the state and the only western unit that does not have a spring muskrat season so those of us who use their fur or consume them must trap them through the ice which is very time consuming and quite unproductive overall.

**PROPOSED BY:** Todd Fritze

(EG-F21-029)

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