

Miscellaneous Topics and Game Management Unit Boundaries

(Licensing and feeding animals; Game Management Unit boundaries, Dalton Highway Corridor Management Area; Nonresident non-guided hunts; and prohibiting harvest of white animals)

PROPOSAL 166

5 AAC 92.012. Licenses and tags.

Amend the requirement for licenses and tags to include game legally taken with dogs and cats as follows:

5 AAC 92.012. Licenses and tags

(a) No hunting or trapping license is required of a resident under the age of 18. An appropriate license and big game tag are required of nonresidents, regardless of age, for hunting and trapping. No person may take waterfowl unless that person has a current, validated, federal migratory bird hunting stamp or "duck stamp" in possession as required under federal regulations. **No person may take game (except deleterious exotic wildlife) with a dog or cat, unless the dog or cat is used to find, tree, or retrieve game taken in season and in an area open to hunting in association with a hunting license or permit.**

(b) ...

What is the issue you would like the board to address and why? In 1916 Edward Howe Forbush observed that "a man may be fined \$10 for killing a songbird, but he may keep any number of cats." Our pets, particularly cats and dogs, are capable of injuring and killing wildlife. Dogs can kill a moose or caribou; however, state and local regulations have significantly reduced the number of wild animals killed by dogs. For instance, AS 03.55.030 allows any person to kill a free-ranging dog that habitually annoys domestic or wild animals after giving the owner reasonable opportunity to restrain the animal. And the local jurisdictions where most dogs live usually require dogs to be licensed and leashed, which promotes responsible ownership. Not so with cats. State law does not allow a person to shoot a cat harassing wildlife and most local jurisdictions do not require licenses, much less leashes for cats.

Cats are not native to North America. However, the number of pet cats has tripled during the last 40 years, and pet cats are now more numerous than dogs, with an estimated 94 million pet and 70-100 million unowned cats in the U.S. Cats are now the most abundant terrestrial carnivore in North America.

Free-ranging cats, including many pets but also feral, abandoned, and stray cats, kill an estimated 1.3 to 4 billion wild birds and 6.3 to 22.3 billion mammals annually in the contiguous United States.¹ Using the same predation rates as the national study, an estimated 30,000 free-ranging and 74,600 pet cats are estimated to kill 1,148,000 birds and 5,975,000 mammals annually in the Municipality of Anchorage alone.² These estimates are driven primarily by the high numbers of cats. The average pet cat probably kills less than a bird a month, but it adds up.

Cats kill far more wild animals than they do house mice, rats or other deleterious exotic species. Cats are now the single greatest cause of wild bird mortalities. They kill more birds than windows, communication towers, vehicles, and pesticides combined.¹ Many of their prey are not normally considered game animals. However, cats compete with coyotes, foxes, lynx, ermine and other mid-sized furbearers and fur animals by removing voles, shrews, squirrels and even snowshoe hares from the food chain. Cats hunt and kill even when well fed.

If your dog is harassing wildlife and you know about it but don't do anything, Alaska law allows your neighbor to shoot the dog. If your young son is shooting protected birds or game birds out of season with his BB gun, you are responsible and may be fined. If you use your dog to find or retrieve game birds, you need a hunting license. Alaskan falconers, who possess birds of prey to hunt game animals, are required to purchase a hunting license even if the bird isn't flown that year. But if your cat is killing dozens of birds and small mammals every year, you don't need a hunting license and you'll never suffer the indignity of a game violation for your cat's wanton waste.

That's wrong and it should be rectified. People who own pet cats or feed stray or feral cats should be held responsible for taking protected species or "hunting" in closed areas or out of season. In other words, they should be required to purchase a hunting license annually if they know or can be reasonably expected to know that their cat is hunting wildlife, and to take reasonable precautions to prevent the cat from hunting protected species, in closed areas, or out of season.

Everyone knows free-roaming cats kill wild birds and mammals and, in a perverse sense, that cat predation is "hunting related." Reasonable precautions should include keeping cats indoors or otherwise under control, affixing a predation-control device to the cat's collar, or not owning a cat in the first place. Certainly, abandoning a cat or allowing a cat to roam outside presupposes that the cat will prey on wild birds and mammals.

¹ Loss, S.R., T. Will, and P.P. Marra. 2013. The impact of free-ranging domestic cats on wildlife in the United States. Nature Communications 4. <http://www.nature.com/articles/ncomms2380>

² Sinnott, R. 2019. Animal control in Anchorage, Alaska: cats and dogs deserve equal treatment. Prepared for the Anchorage Animal Control Advisory Board and Anchorage Watershed and Natural Resources Advisory Commission, Anchorage, Alaska. 110 pp. <https://www.muni.org/Departments/OCPD/Planning/SiteAssets/Pages/WNRCReso-MinutesArchive/WNRC%20ltr%20to%20Animal%20Control%20Board%20w%20Report-12-20-2019%20rev.pdf>

PROPOSED BY: Rick Sinnott

(EG-F20-033)

PROPOSAL 167

5 AAC 92.230. Feeding of game.

Add cats and dogs (and wild birds from April 1 to September 30) to the list of species that may not be intentionally or negligently fed outdoors without a permit, as follows:

5 AAC 92.230. Feeding of game

(a) Except as provided in (b) of this section or under the terms of a permit issued by the department, a person may not

(1) negligently feed a moose, deer, elk, sheep, bear, wolf, coyote, fox, wolverine, **dog, cat,** [OR] deleterious exotic wildlife, **or wild birds from April 1 to September 30,** or negligently leave human food, animal food, mineral supplements, or garbage in a manner that attracts these animals;

(2) intentionally feed a moose, deer, elk, sheep, bear, wolf, coyote, fox, wolverine, **dog, cat,** [OR] deleterious exotic wildlife, **or wild birds from April 1 to September 30,** or intentionally leave human food, animal food, mineral supplements, or garbage in a manner that attracts these animals.

(b) The prohibitions described in (a) of this section do not apply to the use of bait for trapping furbearers or deleterious exotic wildlife, or hunting bears under 5 AAC 92.044, or hunting wolf, fox, or wolverine with bait as described in 5 AAC 92.210, and elsewhere under 5 AAC 84 - 5 AAC 92.

(c) It is an affirmative defense to a prosecution for illegal feeding under this section that the food placed outside to feed dogs or cats or to attract birds is in a feeder that is designed, reinforced, enclosed, mounted or suspended in such a fashion that prevents a wild or deleterious exotic animal listed in (a) from consuming the food, or any animal from spilling the food so that it can be consumed by a wild or deleterious exotic animal listed in (a).

What is the issue you would like the board to address and why? In the 1970s the State of Alaska prohibited feeding bears to minimize habituation to humans and attracting them to human habitation. Habituation combined with a desire for anthropogenic foods can result in wildlife threatening public safety or damaging property. In the past four decades a variety of other species have been added to the list, and the prohibition on the feeding of game has been refined and made more enforceable.

Feeding domestic animals outdoors is prohibited if it attracts bears and other animals on the list. Presumably, feeding cats, dogs and wild birds outdoors is also prohibited when it attracts bears and other species on the list. And yet many people do so. The problem is that a bear, coyote, fox or other species on the list must be attracted by the food in order to trigger the violation. Once that happens, of course, the cat is already out of the bag. Many pet owners and bird feeders are unaware that a bear, rat, house mouse, pigeon or other animal on the list is consuming the food, at least initially. The problem is magnified many fold by the sheer number of households in a place like Anchorage, the Mat-Su Valley, Fairbanks, Juneau, or Kenai.

Species have been included on the list because feeding them outdoors leads to property damage and threats to public safety. If cats and dogs were not fed outdoors, that would significantly limit the amount of food left outside for other species to eat.

This is not mere speculation. Food left outdoors for pets or unowned domestic animals like feral cats often attracts wild and deleterious exotic animals, thereby negligently violating the law. Some “feeding stations” for feral cats in rural settings and city parks attract far more wildlife than cats and “feeding stations” in urban and suburban areas also attract rats, house mice, pigeons and starlings.^{1,2,3}

Similarly, bird feeders attract bears during the months they are out of their dens. Birdseed, suet, peanuts, sugar water, and other foods placed outside for wild birds are just as likely to attract bears as pet food left outdoors. This doesn’t seem like much of a problem until you realize that thousands of Alaskans feed birds during the summer months when bears are active. The birds don’t need anthropogenic foods during the summer, and relatively few birds are attracted to feeders. Often, a bird feeder filled in spring retains the same seeds all summer long.

Adding cats, dogs and wild birds to the list of species that cannot be fed outdoors without taking precautions will promote safer pet feeding practices, attract and habituate far fewer bears and other listed species, and greatly simplify enforcement of this regulation.

¹ Hawkins, C.C., W.E. Grant, and M.T. Longnecker. 2004. Effect of house cats, being fed in parks, on California birds and rodents. Pp. 164-170 in Proceedings 4th International Urban Wildlife Symposium. <https://cals.arizona.edu/pubs/adjunct/snr0704/snr070421.pdf>

² Theimer, T.C., A.C. Clayton, A. Martinez, D.L. Peterson, and D.L. Bergman. 2015. Visitation rate and behavior of urban mesocarnivores differs in the presence of two common anthropogenic food sources. Urban Ecosystems 18:895-906. <https://link.springer.com/article/10.1007/s11252-015-0436-x>

³ Leikam, B., and G. Kerekes. [2018]. Feeding the feral: a study on feral cat’s environmental impact. Urban Wildlife Research Project blog. <https://urbanwildliferesearchproject.com/feeding-the-feral-a-study-on-feral-cats-environmental-impact/>

PROPOSED BY: Rick Sinnott (EG-F20-036)

PROPOSAL 168

5 AAC 92.XXX. New regulation.

Adopt a new regulation that specifies the Board of Game will not require guides for nonresidents hunting moose, caribou or black bear as follows:

Prohibit the creation of any new must-be-guided moose, caribou, or black bear hunts for nonresident U.S. citizens.

What is the issue you would like the board to address and why? Creation of new “must-be-guided” hunts for nonresidents.

The Alaska Legislature in statute (AS 16.05.407) requires all nonresident (U.S. citizen) hunters to be accompanied by a licensed guide when hunting Dall sheep, brown bear, or mountain goat, and

requires all nonresident aliens (AS 16.05.408) to be accompanied by a licensed guide when hunting any big game animal.

Resident Hunters of Alaska (RHAK) continues to believe that the Board of Game does not have the authority outside the legislature to create new must-be-guided species for nonresident U.S. citizens. However, the Department of Law attorney attached to the board believes otherwise.

Aside from taking this issue before the legislature, we would like the board to prohibit the creation of any new must-be-guided hunts for nonresident U.S. citizens for species not within AS 16.05.407.

Whenever the board creates these new must-be-guided hunts for moose, for example, in the interior, it causes residents to lose opportunity. These must-be-guided moose hunts for nonresident U.S. citizens are in fact a separate subsidy and allocation to individual guides and the legislature never intended to require nonresident U.S. citizens to be accompanied by a guide when hunting moose, or caribou or black bear.

PROPOSED BY: Resident Hunters of Alaska (HQ-F20-019)

PROPOSAL 169

5 AAC 92.XXX. New regulation.

Prohibit the harvest of white animals as follows:

No white animals should be harvested for any reason as it violates Native American religion.

What is the issue you would like the board to address and why? No white animals should be harvested as it violates Native American religions. A white bison was born in our state along with white moose, ravens, and a killer whale in the last few years which is prophecy according to Native American religions which indicates the times we live in and spiritual responsibility. Killing them for any reason violates this spiritual belief that there could be negative natural effects to earth and mankind for doing so. We now have many “lower 48” natives who hold this spiritual belief that are now residents of Alaska. If this proposal is not enacted profiteers could make multiple thousands of dollars for the hide while insulting and committing spiritual blasphemy to Native American religions. It could have a worse effect than we know.

PROPOSED BY: Ed Sarten (EG-F19-142)

PROPOSAL 170

5 AAC 92.450. Description of game management units.

Modify the Unit 1C and Unit 4 boundaries as follows:

Unit 1C: that portion draining into Stephens Passage and Lynn Canal north of Cape Fanshaw and south of the latitude of Eldred Rock, including Berner's Bay, Sullivan Island, **Pleasant Island, Porpoise Islands**, and all mainland portions north of Chichagof Island and south of the latitude of Eldred Rock, and excluding drainages into Farragut Bay.

Unit 4: All islands south and west of Unit 1C and north of Unit 3, including Admiralty, Baranof, Chichagof, Yakobi, **and** Inian [, AND PLEASANT] Islands and all seaward waters and lands within three (3) miles of the coastlines.

What is the issue you would like the board to address and why? Shift the boundary between Unit 1C and 4 to include Pleasant and Porpoise Islands in Unit 1C

Pleasant and Porpoise Islands are much more closely related ecologically and geographically with the Gustavus Forelands (Unit 1C) than with Chichagof Island (Unit 4) to the south. Pleasant Island is a small island approximately one mile south of Gustavus. Porpoise Islands are a very small series of islands east of Pleasant Island. For management purposes, current big game regulations for the remainder of Unit 1C are more appropriate for Pleasant and Porpoise Islands than Unit 4 regulations.

Pleasant Island is an important source of deer for the community of Gustavus. From RY2014 to RY2018 hunters harvested five deer total (range 0-4) on Pleasant Island. During the previous five-year period (RY2009 – RY2013), 152 deer (range 8-56) were harvested. Winters have been mild which can result in greater dispersal of deer across the landscape contributing to variability in harvest. Wildlife can move freely between Pleasant Island and the Gustavus Forelands. The distance between Pleasant Island and the mainland is approximately 0.65 mile (~1 km).

Deer hunting regulations for Unit 4 allow residents and nonresidents to harvest six deer annually between August 1 and December 31. Antlerless harvest is allowed after September 15. Federally qualified hunters can hunt through January and may harvest additional deer for any other federally qualified hunter under the federal designated hunter program. Gustavus residents are federally qualified. Harvest under these regulations are currently unsustainable for this island.

Deer hunting regulations for the Remainder of 1C are two bucks for residents and nonresidents from August 1 to December 31 under state regulations and four deer for federally qualified rural residents. Under federal regulations, does are allowed between September 15 and December 31. These regulations are likely unsustainable for Pleasant Island as well, but are currently more suitable than Unit 4 regulations.

Black bears are occasionally observed on Pleasant Island. There is currently no hunting season for black bears in Unit 4. If Pleasant Island was moved to Unit 1C, there would be a black bear season from September 1 to June 30 for both residents and nonresidents.

Wolf seasons and bag limits for wolves are currently identical for Unit 1C and Unit 4 under both hunting and trapping regulations.

Porpoise Islands are a group of very small islands east of Pleasant Island and while not much wildlife occur on these, it is appropriate to include these in Unit 1C.

Adoption of this proposal will require assessment of current customary and traditional findings and amounts necessary for all species for subsistence determinations for both Unit 4 and Unit 1C.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F20-059)

PROPOSAL 171

5 AAC 92.450. Description of game management units.

Divide Unit 19A into two subunits as follows:

The description of the eastern boundary of **Unit 19A** will be the same description for the TM680 moose hunt in the ADF&G Hunting Regulations book.

That is – “*The Kuskokwim River drainage downstream from, and including the George River drainage, and downstream from and excluding the Downey Creek drainage.*”

The description of the western, (same), border of **Unit 19E** will be - “*The Kuskokwim River drainage upstream from, and excluding the George River drainage, and upstream from, and including the Downey Creek drainage.*”

Note: The Stony Holitna Advisory Committee submitted maps with this proposal which are available on the Board of Game proposal book webpage at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook or by contacting the ADF&G Boards Support Section at (907) 465-4046.

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

The division of Game Management Unit 19A into two subunits - 19A West to remain 19A and 19A East to become 19E.

Background Information:

The Tier II hunt in 19A West and the Closure in 19A East, came about in 2006, primarily because residents in the two areas had/ have fundamentally different views on moose management.

There are two Advisory Committees in 19A –

- Acting in the interests of western 19A - The Central Kuskokwim Advisory Committee (CKAC), representing five villages – Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek.
- Acting in the interests of eastern 19A - The Stony Holitna Advisory Committee (SHAC), representing four villages – Red Devil, Sleetmute, Stony River, and Lime Village.

The existence of two separate Game Management Units will simplify and facilitate wildlife management by ADF&G in each of the new subunits, particularly in regard to moose.

There are several differences between the two areas that offer compelling reasons for the division of 19A.

This following info is excepting the Lime Village Management Area, LVMA.

- Although all of 19A is designated as an Intensive Management Area, and qualifies for aerial wolf predator control, this program has been operational only in 19A East since 2009.
- 19A has two identified moose stocks, with two separate harvestable surpluses, which are managed separately by ADF&G.
- 19A East and West have different use patterns from each other.
- There are two separate hunts in 19A- RM682 in 19A East & TM680 in 19A West.
- SHAC and CKAC want these hunts to continue to remain separate.
- The topography of those portions of 19A that is accessible by boat is mainly heavily timbered, upland in the west, and mainly lowlands with both tundra and timber in the east.
- Land ownership is mainly federal and native corporation land in the west, and state and Native corporation land in the east, which has negatively affected the success of predator control programs, due to its prevention on both federal and Native corporation land. *In 2019, the local Native corporation board voted to allow predator control on its lands. This will contribute to the success of the two predator control programs in both 19A East and 19A West.*
- As of the March, 2020 Board of Game meeting, 19A West now has a separate predator control program

PROPOSED BY: Stony Holitna Fish and Game Advisory Committee (HQ-F20-032)

The Board of Game deferred this proposal from the Interior and Eastern Arctic Region meeting in March 2020. The original proposal was Proposal 64.

PROPOSAL 172

5 AAC 92.530. Management areas.

Clarify the legal use of highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area (DHCMA) for hunting and trapping. Clarify the use of firearms, and transport of furbearers and trapping bait when trapping in the DHCMA:

- Do hunting restrictions in 5 AAC 92.530(7) allow travelers who exit the DHCMA (e.g. to travel by licensed highway vehicle or other motorized means to Nuiqsut, Anaktuvuk Pass, Bettles, Wiseman, Coldfoot airport, or by snow machine to a homestead outside the corridor) to hunt once they exit the DHCMA?
- Does the definition of “off-road vehicle,” in AS 19.40.210 affect use of a “licensed highway vehicle” and “snow machine” in 5 AAC 92.530(7)?
 - When it is operated off the highway, is a “licensed highway vehicle” in 5 AAC 92.530(7) an “off-road vehicle,” as defined by 19.40.210?
 - Is the prohibition in 5 AAC 92.530(7) on use of motorized vehicles, with exceptions

for use of licensed highway vehicles, snow machines, aircraft and boats consistent with restrictions placed on off-road vehicles and snow machines in AS 19.40.210?

- Does the prohibition on hunting in 5 AAC 92.530(7)(B) also prohibit trapping?
 - If 5 AAC 92.530(7)(B) allows use of firearms for trapping in 5 AAC 92.530(7), is this consistent with the prohibition of hunting with firearms in AS 16.05.789?
- May a trapper or hunter crossing the DHCMA with a snow machine, stop to hunt or trap within the DHCMA, or become “parallel to the right-of-way of the highway” without violation of AS 19.40.210?
- May a trapper or hunter use a snow machine to enter the DHCMA from outside the area and trap or hunt within the DHCMA if the trapper does not travel all the way across the DHCMA?

What is the issue you would like the board to address and why? This is a placeholder proposal, intended to solicit public and agency input regarding the interpretation of state statutes and regulations pertaining to the Dalton Highway Corridor Management Area (DHCMA). Clarification is needed, as there is confusion within state government and the public regarding which activities and methods of access are legal within the DHCMA and what changes to 5 AAC 92.530(7) the Board of Game could legally undertake.

Although the above list is not a comprehensive list of issues associated with the DHCMA, the department recommends clarification of these issues in order to give the public the ability to correctly follow the restrictions set out in 5 AAC 92.530(7) and statutes AS 19.40.210 and AS 16.05.789, or to recommend changes to 5 AAC 92.530(7).

Federal access permits are also a consideration on federal lands within the DHCMA. For example, on federal lands in the DHCMA, federally-qualified users may use a snowmachine to trap, but cannot use a snowmachine to transport furbearers they catch or parts of game used as bait because of current language in 5 AAC 92.530(7). Additionally, nonfederally qualified users may obtain a permit to cross federal lands in the DHCMA by snowmachine in order to access property outside the DHCMA, but they may not use a snowmachine to trap in the DHCMA or transport game across the DHCMA. Federally-qualified trappers and nonfederally-qualified trappers who obtain such a permit can use snowmachines on federal land, but not state lands such as frozen rivers, and cannot transport game.

To aid the board in their decisions regarding 5 AAC 92.530(7) and possible conflicts this regulation may have with Alaska Statutes, we provide the relevant statutes below. Regulation 5 AAC 92.530(7) prior to the March 2019 Board of Game meeting is also included. The most recent board changes to 5 AAC 92.530(7) will be provided when they are available to the department.

Regulation 5 AAC 92.530. Management areas. The following management areas are subject to special restrictions:

...

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24–26 extending five miles from

each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area;

(B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway Corridor Management Area is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no motorized vehicle may be used to transport hunters, hunting gear, or parts of game, within the Dalton Highway Corridor Management Area, except that

(i) licensed highway vehicles may be used on the following designated roads:

(1) Dalton Highway, (2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the trail is open for winter travel, (3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open, (4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility, (5) the Sagavanirktok River access road two miles north of Pump Station 2, and (6) any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;

(ii) aircraft and boats may be used;

(iii) a snowmachine may be used to cross the management area from land outside the management area to access land on the other side of the management area;

(D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area

...

Alaska Statute Sec. 16.05.789. Prohibition on hunting adjacent to highway between Yukon River and Arctic Ocean.

(a) Hunting with firearms is prohibited north of the Yukon River in the area within five miles on either side of the highway between the Yukon River and the Arctic Ocean.

(b) A person who violates this section is guilty of a class A misdemeanor.

Alaska Statute Sec. 19.40.210. Prohibition of off-road vehicles.

(a) Off-road vehicles are prohibited on land within the highway corridor. However, this prohibition does not apply to

(1) off-road vehicles necessary for oil and gas exploration, development, production, or transportation;

(2) a person who holds a mining claim in the vicinity of the highway and who must use land in the highway corridor to gain access to the mining claim;

(3) the use of a snow machine to travel across the highway corridor from land outside the

corridor to access land outside the other side of the corridor; this paragraph does not permit the use of a snow machine for any purpose within the corridor if the use begins or ends within the corridor or within the right-of-way of the highway or if the use is for travel within the corridor that is parallel to the right-of-way of the highway; or

(4) a person who must use land in the highway corridor to gain access to private property that

(A) is located outside the corridor; and

(B) has an established history of use as a homestead.

(b) Nothing in this section authorizes a person to access the land of another person unlawfully.

(c) In this section, “highway corridor” or “corridor” means land within five miles of the right-of-way of the highway.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F19-152)

The Board of Game deferred this proposal from the Interior and Eastern Arctic Region meeting in March 2020. The original proposal was Proposal 63.

PROPOSAL 173

5 AAC 92.530(7). Management areas.

Repeal the Dalton Highway Corridor Management Area as follows:

Repeal 5 AAC 92.530(7) in total. Present language does not mirror all of the restrictions in Alaska Statute 19.40.210 causing confusion among hunters and enforcement. Present language in codified:

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24-26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area.

(B) the area within the Prudhoe Bay Closed Area is closed hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no motorized vehicle may be used to transport hunters, hunting gear, or parts of game, within the Dalton Highway Corridor Management Area, except that

(i) licensed highway vehicles may be used on the following designated roads:

(1) Dalton Highway,

(2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce the trail is open for winter travel,

(3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open,

(4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility,

- (5) the Sagavanirktok River access road two miles north of Pump Station 2, and any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;
 - (ii) aircraft and boats may be used
 - (iii) a snowmachine May be used to cross the Management area from land outside the management area to access land on the other side of the management area
- (D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area;

What is the issue you would like the board to address and why? REPEAL (7) the Dalton Highway Corridor Management Area. The restrictive regulations codified are unnecessary and confusing to the public and law enforcement. The guiding restrictions are clear in AS 19.40.210. Hunting regulations should refer to the statute. Conflicts arise from federal agency management for federally qualified rural Alaskans to the detriment of Alaskans who are subsistence hunting. The statutory limits prevail so let's use the instead of re-creating some of them.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (EG-F19-116)

PROPOSAL 247

5AAC 92.110. Control of predation by wolves.

Discontinue lethal taking of wolves under predation control implementation programs as follows:

I recommend:

Non-lethal predator control only.

Discontinuation of all "Judas wolf" programs.

Full protection of all wolves in a ten mile boundary surrounding federal conservation areas, state and national parks.

Prohibition on killing of wolves, including pups, during seasons of reproduction and care of the young.

An end of all aerial hunting of wolves.

What is the issue you would like the board to address and why? The current methods used to manage wolves in Alaska, as explained in previous letters:

- **Are based on poor science and inadequate predator/prey population surveys;**
- **Are not scientifically peer reviewed;**
- **Do not recognize or protect natural variability of dynamic ecosystems;**
- **Do not account for the growing ecological impacts of climate change;**
- **Are designed for mostly urban, not rural subsistence, hunters;**
- **Are not supported by many Alaska citizens;**
- **Can result in prey populations exceeding habitat carrying capacity, thus degrading habitat;**
- **Can lead to unintended consequences, including increasing predation due to immigration of predators into control areas;**
- **Prioritize consumptive use of wildlife over non-consumptive use, contrary to the Alaska constitution; and**
- **Produce little scientific evidence that the programs are effective.**

It is time for reputable, professional wildlife scientists in ADF&G to admit such practices harm more than helping.

I urge you to do the following:

1. Discontinue all lethal programs of so-called predator control and institute only non-lethal methods.

2. Immediately discontinue and disallow "Judas wolf" programs which undermine the health of the ecosystem.
3. Directly prohibit any taking or hunting in any form of wolves within 10 miles of federal and state parks, conservation units and other protected areas. As experts and lay persons know well, the range of wolves does not necessarily adhere to government delineated boundaries, and without protections, wolves will be eliminated from areas which should be safe for them.

I am not a resident of Alaska. When I visited Alaska, I was appalled by the dominance of the "bad boy" hunter mentality in which frankly ignorant views are promoted over scientific ones, and in which torture and cruelty to valuable predators is not just tolerated but encouraged. Please work to revise your so-called predator control laws. Wolves help maintain a healthy ecosystem and lead to better prey hunting for those who choose to do so, not worse. Let science and not ignorance prevail. You have the power to make the change.

Sincerely, Lydia Furman MD

Member of Alaska Wildlife Alliance

PROPOSED BY: Lydia Furman (EG-F21-022)

PROPOSAL 248

5 AAC 92.010. Harvest tickets and reports.

5 AAC 92.003. Hunter education and orientation requirements.

Allow nonresident youth to harvest big game on behalf of an adult permit holder as follows:

On page 13 of the Alaska Hunting Regulations book, we could simply add nonresidents to the following regulations. See below:

Big game bag limit for hunters under age 10, all hunts: **Resident and nonresident** hunters under age 10 may not have their own big game bag limit, so they may not obtain harvest tickets or permits. They may only take big game on behalf of a licensed hunter at least 18 years of age, and they must be under the direct, immediate supervision of that hunter. The supervising adult hunter is responsible for ensuring all legal requirements are met, and must comply with big game locking-tag requirements, if applicable, and validate required harvest tickets or permits.

Big game general season hunts for hunters age 10 and older: Hunters age 10 and older have their own big game bag limit and must obtain their own harvest tickets. Adult supervision is not a requirement for hunters with their own harvest tickets. Big game youth hunts only: Basic Hunter Education is required for all youth hunters participating in "youth hunts." See page 35 for "youth hunt" definition and additional information.

Big game permit hunts for hunters age 10 and older: Hunters age 10 and older are allowed their own big game bag limit and may obtain their own permits. Adult supervision is not a requirement for hunters with their own permits (except youth hunts). Resident **and nonresident** hunters age

10–17 who have successfully completed a Basic Hunter Education course are allowed to hunt on behalf of an adult permit holder, under the direct, immediate supervision of that adult. The adult permit holder must be a licensed hunter, 18 or older, and is responsible for ensuring all legal requirements are met. This does not apply to harvest tickets. In all cases, if a youth is hunting big game on behalf of an adult, the bag limit and responsibility to report belongs to the adult.

What is the issue you would like the board to address and why? Alaska regulations limit the amount of opportunities for non-resident youth hunters. We as outdoors-men (outdoors people), need to promote youth involvement in every aspect. Alaska regulations allow for resident youth age 10-17 to "hunt on behalf of an adult permit holder." There needs to be an opportunity for nonresident youth to experience an Alaskan hunt in the same manner. This would allow many youth who may not have an opportunity to come to Alaska, the ability to experience what this amazing state has to offer.

Changing this regulation does not affect draw results, nor does it dilute the applications. It simply allows for youth to LEGALLY harvest an animal under someone else's tag. This would afford the same opportunities to ALL youth hunters.

PROPOSED BY: Adam Bowers

(EG-F21-021)
