

# Southcentral Region

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**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Soldotna Sports Center**  
**Soldotna, Alaska**  
**March 17 - 21, 2023**

**TENTATIVE AGENDA**

**Note: This Tentative Agenda is subject to change throughout the course of the meeting.** It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

**Friday, March 17, 8:30 a.m.**

OPENING BUSINESS

Call to Order / Purpose of Meeting  
Introductions of Board Members and Staff  
Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

**THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting.**

Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

**Saturday, March 18, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

BOARD DELIBERATIONS upon conclusion of public testimony

**Sunday, March 19, 9:00 a.m.**

BOARD DELIBERATIONS upon conclusion of public testimony

**Monday, March 20, 8:30 a.m.**

BOARD DELIBERATIONS continued

**Tuesday, March 21, 8:30 a.m.**

BOARD DELIBERATIONS conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

**Agenda Notes**

- A. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-6098 no later than two weeks prior to start of the meeting to make any necessary arrangements.



# **Regionwide & Multiple Units**

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## **PROPOSAL 55**

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

Reduce resident cow permits and nonresident bull permits for Southcentral Region units as follows:

I would like the board to consider a minimal amount of nonresident draw permits being issued as well as a decrease in the amount of resident cow permits.

**What is the issue you would like the board to address and why?** Due to the increased populous within the Mat-Su Valley and Kenai Peninsula and beyond, and the number of vehicle/moose collisions that have occurred in the past ten years, I would like the board to consider a minimal amount of nonresident draw permits being issued as well as a decrease in the amount of resident cow permits.

Most vehicle/moose collisions occur during winter months and most are assumed to be pregnant cows. Yes, this would affect the guides. But up until about 2006, moose seemed to be highly abundant and were roaming just about everywhere. In the Anchorage bowl, aside from a draw hunt on JBER (Joint Base Elmendorf-Richardson), moose are sanctified within no hunting zones. As we go south on the Seward Highway and north on the Parks and the Glenn Highways, it is apparently obvious that moose numbers have been in drastic decline for at least a decade.

In hopes to eventually increase moose numbers in these areas, which would provide more opportunity resident harvest of legal bulls, I am asking the board to decrease the amount of resident draw cow permits and nonresident bull permits. There's no reason why vehicle/moose collisions should contribute more to charity than local hunters contribute to our families. Thank you for your consideration.

**PROPOSED BY:** Erik Anderson (EG-F22-078)

\*\*\*\*\*

## **PROPOSAL 56**

### **5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Prohibit taking of big game from boats in Units 6, 7, and 15 as follows:

Illegal to take big game from a boat in Units 6, 7, and 15.

**What is the issue you would like the board to address and why?** It is currently illegal to take big game from a boat in Units 1-5, or black bear in Unit 6D. This regulation should be extended to include all big game in Units 6, 7 and 15. This would bring all coastal units in Southcentral and Southeast into conformity.

**PROPOSED BY:** Dave Lyon (EG-F22-091)

\*\*\*\*\*

**PROPOSAL 57**

**5 AAC 92.090. Unlawful methods of taking fur animals ; exceptions.**

Allow the use of dogs to track and retrieve dead or wounded fur animals in Units 6 - 8, 14C, and 15 as follows:

Allow for more efficient and ethical recovery of fur animals in Units 6-8, 14C and 15 as follows:

Fur Animals:

- Fur animals MAY NOT be taken under the hunting regulations by the following methods:
  - with a dog (except coyote in Unit 20D after registering with ADF&G **and in Units 6 - 8, 14C and 15 a dog may be used to track and retrieve dead or wounded fur animals**), trap, snare, net, or fish trap;

**What is the issue you would like the board to address and why?** Next to ethical shots and lethal shot placement, efficient game recovery is paramount. An individual sitting with his dog while calling in a fox is no different than sitting in a duck blind calling waterfowl. In the event that an animal is wounded and evades the hunter, whether it be a duck, goose, fox, coyote, etc., a well-trained retrieving dog should be allowed to be sent to track, locate and retrieve it. There is NO downside to ensuring a mortally wounded animal is not wasted. Currently on page 13 of the Alaska trapping regulation booklet, the use of dogs is allowed for retrieving dead furbearers. The same should be applied to the small game hunting regulations for dead and wounded fur animals.

**PROPOSED BY:** Mike Harris (EG-F22-160)

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**PROPOSAL 58**

**5 AAC 92.003. Hunter education and orientation requirements.**

Require hunter orientation for hunting goat in Southcentral Region units as follows:

All hunters must complete the Goat Hunter Orientation Prior to hunting. Orientation and quiz are available online at XXXXXXXXX.

-Rocky Mountain Goat alliance has a YouTube video and are currently making another revision to assist goat hunters. I have asked the board if they would work with ADF&G biologists on a video and quiz and they are in support.

**What is the issue you would like the board to address and why?** I believe that there will be a “trickle down effect” from the dwindling sheep numbers, where many sheep hunters will now look to other species. I believe that goat hunting will become more prevalent over the next few years. My concern is that with the increase in goat hunting, there will be an increase in novice goat hunters. This is of grave concern for the harvest of nanny and sub-adult goats. I believe an educational video, such as was done for bear and moose, should be mandatory for all goat hunts.

**PROPOSED BY:** Brian Watkins (EG-F22-008)

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## **Cordova Area Proposals – Unit 6**

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### **PROPOSAL 59**

#### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the RG231 to an archery only hunt for goat in Unit 6 for certified bowhunters as follows:

RG231 One goat by **bow and arrow only** by permit available in person in Cordova beginning Sept. 22 **by certified bowhunters.**

**What is the issue you would like the board to address and why?** RG231 in Unit 6C routinely closes down early because of high success rates and has a high rate of nanny harvest. (This information was obtained from a local wildlife biologist.) In addition, there are limited opportunities for hunters who enjoy the challenge of archery hunting mountain goats. Switching RG231 to archery only would have multiple benefits.

First, it would create a safe environment for hunters who wish to pursue archery hunting for goats without having to worry about being shot over while stalking or having goats chased off by hunters using longer range tactics.

Second, the limited harvest rate of archery would reduce the overall take of goats providing for a longer season and more hunting opportunity, but less impact on population.

Third and most important, the time and attention required to successfully harvest a mountain goat with archery equipment will make it much less likely to kill a nanny. Often, it requires many hours, even days, of close proximity observation before getting close enough to shoot a goat with a bow and this time will be invaluable in studying gender characteristics to ensure harvest of only billies.

This represents another situation where using archery hunting as conservation tool is an excellent option.

**PROPOSED BY:** Paul Forward

(EG-F22-146)

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### **PROPOSAL 60**

#### **5 AAC 85.030. Hunting seasons and bag limits for deer.**

Create an archery only deer hunt in Unit 6 for resident and nonresident certified bowhunters only as follows:

RESIDENT/NONRESIDENT HUNTERS: 5 deer total, bucks only from August 1-September 30 **by bow and arrow only, but during Nov. 1 - Nov. 15 open to certified bowhunters only**

**What is the issue you would like the board to address and why?** Unit 6 deer are relatively easy to access from major population centers and are very vulnerable during the November rut. In addition, the area is open to rifle hunting from August 1-December 31, so there are many periods of time when hunters can legally use rifles to hunt but currently no window of time when those who prefer archery hunting can hunt deer without worry of rifle hunters shooting over them while stalking deer.

The season is very long but the deer are concentrated in certain areas during much of the years making it very difficult for hunters to have a quality and safe experience if they choose to bow hunt. On Kodiak Island there is an archery season so that hunters who wish to bow hunt can have a period of time during which they can safely hunt and this is lacking in Unit 6.

Most importantly, there is an increase pressure on that deer population and overall relatively low numbers in many areas during recent years. Using an archery hunt during some of the deer’s most vulnerable time period would decrease the overall harvest while maintaining the same hunting opportunity for anyone willing to use a bow during that two week period. This would be of benefit to the population and to the hunters in the community.

**PROPOSED BY:** Paul Forward (EG-F22-148)  
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**PROPOSAL 61**

**5 AAC 85.030. Hunting seasons and bag limits for deer.**

Lower the resident and nonresident general season bag limit for deer in Unit 6 as follows:

General Season

Unit 6

Nonresidents

Bag limit: **Two** [FOUR] deer total (see details in season dates below)

Season Dates

Bucks: Aug. 1 – Sep. 30

Any deer: Oct. 1 – Dec. 31

Hunt requires harvest ticket

General Season

Unit 6

Residents Only

Bag limit: **Three** [FIVE] deer total (see details in season dates below)

Season dates:

Bucks : Aug. 1 – Sep. 30

Any deer: Oct. 1 – Dec. 31

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** Resident sport hunters for deer in Unit 6 do not need five deer and nonresidents do not need four. Deer populations in Unit 6 “seem” to not be doing as well in recent years. Between bad winters and “meat hunts” where deer are taken off the beach from a boat, the quality of the hunt is going down.

**PROPOSED BY:** Mike Harris (EG-F22-159)  
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**PROPOSAL 62**

**5 AAC 85.045(4) Hunting seasons and bag limits for moose.**

Re-establish an antlerless moose season in Unit 6C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 <b>moose</b> [BULL] by drawing permit only; up to 40 permits <b><u>for bulls and up to 20 permits for antlerless moose</u></b> may be issued; or	Sept. 1-Oct. 31 (General hunt only)	No open season.
1 <b>moose</b> [BULL] by registration permit only;	Nov. 1-Dec. 31	No open season.
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts are used to manage population growth and keep it within the limits of what the habitat can support. Antlerless moose hunting opportunity has been consistently provided in Unit 6C since 1984. The Copper River/Prince William Sound Fish and Game Advisory Committee did not meet during 2021 and was unable to reauthorize the hunt, thus it had to be removed from regulation.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2018 yielded an estimate of 677 moose, 32% of which were calves. Because the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, the state has not held an antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as intended if it is needed.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-059)  
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**PROPOSAL 63**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Lengthen the brown bear season in Unit 6D, excluding Montague Island as follows:

Brown/Grizzly Bear:

Resident and Nonresident

Unit 6D Remainder: One bear every four regulatory years

Oct. 1 – May 25

**What is the issue you would like the board to address and why?** Lengthen the brown bear season in Unit 6D, except Montague Island as follows: October 1 through May 25. Changing the season opening would align with the opening of doe (antlerless) deer season. General public would be able to harvest a bear legally, instead of DLP (Defense of Life or Property) or unreported take during brown bear confrontations while black-tailed deer hunting.

**PROPOSED BY:** Wayne Woods (HQ-F22-005)  
\*\*\*\*\*

**PROPOSAL 64**

**5 AAC 92.095(4). Unlawful methods of taking furbearers; exceptions.**

Change the minimum jaw spread for trapping land otter in Unit 6 as follows:

[5 7/8] 5 1/8

**What is the issue you would like the board to address and why?** Inside jaw spread of 5 7/8” or greater. That is the equivalent of a number five long spring which most people cannot set with their hands. Otter season should end with the end of mink season or the inside jaw spread should be 5 1/8” or greater, or do away with jaw spread requirements.

This poses an inconvenience and safety hazard.

**PROPOSED BY:** Gary Facteau (EG-F22-016)  
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# **Kodiak Area Proposals – Unit 8**

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## **PROPOSAL 65**

### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Establish a fall, registration goat hunt for residents and nonresidents in Unit 8, that portion of the Aliulik Peninsula as follows:

Make a separate registration mountain goat hunt on the Aliulik Peninsula (DB 107/207) area, and reduce the bag limit to one goat and restrict the season dates to September 1 - November 15.

**What is the issue you would like the board to address and why?** RG480 mountain goat hunts which includes the Aliulik Peninsula (DB 107/207). The billy:nanny ratio, billy age class, and overall population are all in decline. The mountain goats along the Aliulik Peninsula are very susceptible to harvest from boat operators during the winter months when the goats move down the mountain and can be harvested from watercraft. Along with the billy:nanny ratio, billy age class, and overall population being in decline, we have also witnessed a decline in the nanny per kid ratio. The young age class of billies in the area could definitely be contributing to the low nanny to kid ratio.

**PROPOSED BY:** Lance Kronberger (EG-F22-046)

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## **PROPOSAL 66**

### **5 AAC 85.040. Hunting seasons and bag limits for goat.**

Create an archery only, resident goat hunt within the Unit 8, RG480 hunt area as follows:

I propose that ADF&G work with area biologists to create an archery only area within the RG480 hunt. Some of the more popular float plane lake destinations would be good candidates as would the Hepburn Peninsula that gets heavy pressure from boat based hunters.

**What is the issue you would like the board to address and why?** RG480 is a wonderful opportunity for Alaska residents to hunt mountain goats in a sustainable way. Unfortunately, some areas of the RG480 area get hunted very hard while others see very little traffic, and thus less of the intended population reduction. One solution for this would be to create an archery only area within RG480. Choosing a more high traffic area for the archery only area would decrease traffic, pressure and harvest in that area while increasing hunting pressure in other, currently less utilized areas, thus spreading out the overall harvest and hunting pressure.

This would also create a wonderful opportunity for Alaskans who would enjoy the challenge of more safely hunting mountain goats with archery equipment away from the pressure and hazards associated with rifle hunters being in the same area.

As with all archery only hunts, it should be reiterated that this hunt would not decrease any hunting opportunity for any Alaska resident. It would simply require that hunters who wish to use these areas do so with archery equipment.

**PROPOSED BY:** Paul Forward (EG-F22-151)

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**PROPOSAL 67**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Decrease the number of tags for the DG478 and DG479 goat hunts in Unit 8, to guarantee allocation of the weapons restricted, late season registration hunt as follows:

Decrease allocation of DG permits by 10-20 tags per hunt (or whatever reduction local game management believes would allow for five to ten RG478 and RG479 tags, respectively, per season) and guarantee an allocation of RG tags each year for the weapons restricted late season registration hunt.

**What is the issue you would like the board to address and why?** In the past, the RG478 and RG479 archery goat hunts reliably opened, but most of the last five years, they have been limited to no registration archery goat hunts during most seasons for the Kodiak road system. In the past, RG478 and RG479 were some of the only economical goat hunts for resident archery hunters in the state. Because of recent harvest success rates during the DG478 and DG479, the registration tags have not become as available, depriving hunters who prefer to hunt with archery equipment the chance to pursue goats without the risk associated with hunting the relatively small road system area while rifle hunters are also afield. (The risk of being shot over or at while stalking goats with a bow is real, not mention the more common scenario of rifle hunters spooking game at longer distances while archery hunters are stalking the same animals.)

Decreasing the number of tags awarded during DG478 and DG479 to ensure that the registration hunt can still happen would create the unique opportunity for resident hunters to pursue mountain goats in an economical way (i.e. without the need of air or water taxis or transporters) from the road system. Additionally, the limited efficacy of archery equipment would ensure that few goats would be harvested and the nature of the registration hunt would allow game managers to shut down the hunt if the desired number of goats were killed during the RG hunt.

**PROPOSED BY:** Paul Forward (EG-F22-150)  
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**PROPOSAL 68**

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

Modify the Unit 8, caribou hunting season from a general season harvest ticket to a registration hunt as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(2)		
Unit 8	Aug. 1–Jan. 31	Aug. 1–Jan. 31

1 caribou **by registration permit only**

**What is the issue you would like the board to address and why?** This proposal changes the Kodiak Island Unit 8 caribou hunt from a general season harvest ticket hunt to a registration hunt. Administering the hunt as a registration permit allows the department to utilize its discretionary permit authority to maintain harvest at sustainable levels. If passed, the department will establish an annual harvest quota and implement a 5-day reporting requirement (in person or by phone) to the ADF&G Kodiak office following the completion of the hunt. Implementation of a 5-day reporting requirement will provide the department near real time harvest information and provide the opportunity to close the hunt promptly when the harvest quota is reached. The Kodiak Island caribou herd has been consistently estimated at 300-400 animals since the late 1990s'. Caribou harvest was relatively consistent between 2000-2014 with an average annual harvest of approximately 18 animals per year. However, beginning in 2015 the interest and resulting harvest of caribou on Kodiak has increased significantly to an average annual harvest of 43 caribou per year. The widespread interest in hunting caribou on Kodiak continues to increase as documented by the increased number of hunters participating in the hunt. The average number of hunters participating in the caribou hunt annually from 2000-2013 was 34. The average number of hunters participating in the caribou hunt annually from 2014-present was 73, more than double the previous average. Modifying the caribou hunt from a general season harvest ticket to a registration hunt will aid the department in achieving and maintaining the caribou herd at a management objective of 350-500 animals.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-060)  
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**PROPOSAL 69**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Exclude Kodiak Island from the hunt area for elk in Unit 8 Remainder as follows:

Modify the definition of elk area “Unit 8 Remainder” to remove Kodiak Island and include only the areas on Afognak Island.

**What is the issue you would like the board to address and why?** Closing Kodiak Island from elk hunting may give Roosevelt elk a chance to populate the area. Roosevelt elk have successfully populated Afognak (and Raspberry) Island since 1929. Some Roosevelt elk have occasionally been able to swim to Kodiak Island, but were hunted and killed after. If the season was closed on Kodiak Island indefinitely, it would allow elk that migrate to grow into a huntable population.

A huntable population could increase revenues to the Alaska Department of Fish and Game as well as guides by attracting more hunters. Elk are some of the most highly desirable species to hunt in the United States.

Elk on Kodiak Island could increase food security for the island in two ways. First, having elk on the island simply increases physical access to food. One elk can often yield over 400 lbs. of meat, nearly the weight of a butchered moose. Secondly, it would increase the economic access to food on Kodiak, where meat is expensive to purchase. Any resident of Kodiak Island could benefit from a significant meat source, but more specifically, residents of the town of Kodiak have limited subsistence food sources on the road system. Often the subsistence users with the greatest need have few economic resources. In Kodiak, in most years, residents need expensive vehicles to get

off the road system (either ATVs or a seaworthy vessel) to gather large volumes of fish or meat. The two subsistence meat sources that can fill a freezer on the road system are the Buskin and Pasagshak rivers' sockeye run, and they often have a run too weak for subsistence fishing. Elk would likely populate near the road system due to the large amount grazing areas nearby. This would allow the subsistence users with limited economic resources to simply walk or drive a highway vehicle to start hunting a freezer filling source of food. The other villages on Kodiak could also benefit from another large food resource.

If elk were to swim to Kodiak Island, as has been reported in the past, the state would not have to expend any resources transplanting animals.

If animals from the same archipelago were to migrate, there would be no concerns of disease. It would also keep the unique and valuable genetics of Afognak elk – the nation's largest elk.

There have been reports of Rocky Mountain elk escaping from the ranch on Narrow Cape on Kodiak. It is possible that the Rocky Mountain elk could risk the genetic makeup of the Afognak Roosevelt elk with cross breeding. The risk exists today because some Roosevelt elk have been reported on Kodiak. One suggestion that can be included with this proposal is to have an open season elk hunt within a certain radius of Narrow Cape – with reporting requirements. If no elk are killed within a certain number of years, the open season could be reevaluated. Another suggestion is to have the state regulate animals that have a risk of being an invasive species or breeding with wild animals.

The US Fish and Wildlife (USFWS) has historically shown they are adverse to the introduction of new species in wildlife refuges. The USFWS could manage the elk on the Kodiak Island Wildlife Refuge as they see fit. However, a large part of Kodiak is not on the refuge and can be managed through a pro-hunting and pro-resource management style as the Board of Game and Alaska residents see best for themselves.

Elk would likely thrive on Kodiak Island, because of the extensive graze and habitat. The deer on Kodiak would have few shared resources with the elk. Elk are grazers, and feed on grasses and sedges. Deer are browsers and consume a different diet. Mountain goats also have little overlap in their diet compared to elk.

There are many advantages to elk populating Kodiak Island, including increased revenue for the state, food security, and more hunting opportunity. All with no startup costs and utilizing mostly unused grazing vegetation on the island.

**PROPOSED BY:** Chris Sibrel (EG-F22-045)  
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**PROPOSAL 70**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Modify the Unit 8, Raspberry Island hunting season and bag limit by changing the antlerless elk drawing hunt to an antlerless registration hunt as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(2)		
Unit 8, Raspberry Island	Oct. 1–Oct. 22 (General hunt only)	Oct. 1–Oct. 22
1 bull elk by drawing permit only; up to 100 permits will be issued		
1 antlerless elk by <b>registration</b> [DRAWING] permit only; [UP TO 200 PERMITS WILL BE ISSUED]	Oct. 23–Nov. 30 (General hunt only)	Oct. 23–Nov. 30

...

**What is the issue you would like the board to address and why?** Additional harvest opportunities for resident and nonresident hunters is available and the department recommends changing the drawing hunt to a registration hunt to increase hunter success. Historically, only a small percentage of Raspberry Island antlerless drawing permit winners show up to hunt. On average, over the last ten years (2011-2020) only 38% of the antlerless drawing winners participated in the hunt resulting in an average of 4.9 antlerless elk harvested annually. The population objective for Raspberry Island is 150-200 elk with a bull:cow ratio of 20-25 bulls:100 cows. Historically, when the total population of elk on Raspberry Island approaches 230-250 animals, the population suffers an abrupt decline. This abrupt reduction in the population has been documented multiple times since the 1960s’ (1965, 1987, 1996, 2018) with the most recent occurring in 2018. Interestingly, the estimated number of bulls on Raspberry Island has stayed relatively consistent over time with drastic fluctuations primarily observed within the cow population. Multiple attempts have been made to decrease the cow population (by increasing the number of antlerless drawing permits) with little to no results. Providing additional opportunities to harvest antlerless elk through a registration hunt will aid the department in achieving and maintaining the management objective of 150-200 elk with a 20-25:100 bull:cow ratio.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-061)

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**PROPOSAL 71**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Establish a drawing permit hunt for elk, open to take by bow and arrow only in Unit 8, Southwest Afognak as follows:

**Hunt Details**

Hunt Number: DEXXX

Hunt Type: Draw

Species: Elk

Legal Animal: One elk

Method: Bow and arrow only. Bowhunter certification is required.

Number of Permits: To be set by the department with up to 10 being issued.

Unit, Area: 08, Southwest Afognak Island

Season Dates: 09/14 – 09/24

Residency Restrictions:

    Hunt available to nonresidents

    Hunt available to Alaska residents

Reporting Requirements:

    Successful Hunters: Report in person or by phone to Kodiak within two days of end of hunt and permit report by mail within five days.

    Unsuccessful Hunters: Report online or by mail within 15 days of season end.

**What is the issue you would like the board to address and why?** Establishing a drawing permit hunt restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would be earlier than existing hunts in the area, which, combined with the limits of archery equipment, would add to the difficulty in harvest and limit impact on elk populations. An example of the low impact of archery equipment can be taken from existing drawing permit hunt DE318 in Unit 3. DE318 takes place from September 1- September 30 and precedes two drawing permit hunts that allow firearms in the same hunt area. According to data pulled from ADF&G, from 2009-2020, 276 permits were issued for DE318 with only 12 bulls being taken. This data shows an average of just over one bull per year being taken. We believe that adding an early season archery hunt should have little ecological effect on the elk population on Southwest Afognak. This hunt would be for the same area as current existing DE711 and DE713.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-128)

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**PROPOSAL 72**

**5 AAC 85.035. Hunting seasons and bag limits for elk.**

Establish a drawing permit hunt for elk, open to take by bow and arrow only in Unit 8, Raspberry Island as follows:

**Hunt Details**

Hunt Number: DEXXX

Hunt Type: Draw

Species: Elk

Legal Animal: One elk

Method: Bow and arrow only. Bowhunter certification is required.

Number of Permits: To be set by the department with up to six being issued.

Unit, Area: 8, Raspberry Island

Season Dates: 09/15 – 09/25

**Residency Restrictions**

Hunt available to nonresidents

Hunt available to Alaska residents

**Reporting Requirements**

Successful Hunters: Report in person or by phone to Kodiak within two days of end of hunt and permit report by mail within 5 days.

Unsuccessful Hunters: Report online or by mail within 15 days of season end.

**What is the issue you would like the board to address and why?** Establishing a drawing permit hunt restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would be earlier than existing hunts in the area, which, combined with the limits of archery equipment, would add to the difficulty in harvest and limit impact on elk populations. An example of the low impact of archery equipment can be taken from existing drawing permit hunt DE318 in Unit 3. DE318 takes place from September 1 - September 30 and precedes two drawing permit hunts that allow firearms in the same hunt area. According to data pulled from ADF&G, from 2009-2020, 276 permits were issued for DE318 with only 12 bulls being taken. This data shows an average of just over one bull per year being taken. We believe that adding an early season archery hunt should have little ecological effect on the elk population on Raspberry Island. This hunt would be for the same area as current existing DE702, DE704 and DE706.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-129)

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**PROPOSAL 73**

**5 AAC 85.030. Hunting seasons and bag limits for deer.**

Reduce the bag limit for deer in Unit 8, Remainder as follows:

In the Remainder of Unit 8, reduce the bag limit to two deer per year for residents and one deer per year for nonresidents.

**What is the issue you would like the board to address and why?** Kodiak Island deer populations are very low and depressed after two consecutive hard winters in 2019-2020 and 2020-2021.

There are not enough deer for people, especially local Kodiak Island residents to get what they need for eating.

I suggest that the bag limit for Sitka black-tailed deer in Unit 8 be reduced to two deer a year for Alaska residents and one deer a year for nonresidents.

**PROPOSED BY:** Stig Yngve (EG-F22-018)

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**PROPOSAL 74**

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

Require that meat must be left on the bone when hunting deer in Unit 8 as follows:

All deer harvested in Unit 8 must remain bone-in until processed at a land-based location.

**What is the issue you would like the board to address and why?** Wanton waste of deer is the issue here, especially with boat based transporters.

**PROPOSED BY:** Stig Yngve (EG-F22-020)

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**PROPOSAL 75**

**5 AAC 92.130(f). Restrictions to bag limit.**

Count brown bear wounded by hunters in Unit 8 against the bag limit of one bear every four calendar years as follows:

If you wound a bear in Unit 8, you cannot hunt for brown bear again in Unit 8 for four regulatory years.

**What is the issue you would like the board to address and why?** I would like to address the issue of wounded bears in Unit 8. Because a calendar year of hunting is different than a regulatory management year, a person can wound a bear in a spring hunt on Kodiak Island and hunt again legally in the fall because the fish and game regulatory year ended in July. I would like to see this changed such that a wounded bear in Unit 8 counts against your tag, just like a harvested bear. It is an issue of hunting morality that needs to be addressed.

If you wound a bear you are done hunting for Kodiak brown bear for four calendar years.

**PROPOSED BY:** Stig Yngve (EG-F22-017)  
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**PROPOSAL 76**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Lengthen the brown bear registration hunt seasons for RB230 and RB260 in Unit 8 as follows:

Currently, fall Kodiak brown bear registration permit RB230 is October 25 - November 30. Change dates to October 25 - **December 31**.

Spring brown bear registration permit RB260 is April 1 - May 15. Change dates to **March 1** - May 15. This recommendation is to extend the hunting season in proximity to the town of Kodiak and livestock ranches in Pasagshak for public safety.

**What is the issue you would like the board to address and why?** Brown bear mortality from Defense of Life or Property activity is increasing in areas surrounding Kodiak and the livestock ranches with the road system area. There is general community concern for public safety and increased destruction of private property. Early in the spring and late in the fall appear to have more disruptive bear behavior. This may be due to lack of plentiful food sources during this time of year. Once a bear finds a garbage or livestock food source, they rarely leave it. Kodiak has ongoing issues with both.

**PROPOSED BY:** Jason Bunch (EG-F22-031)  
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**PROPOSAL 77**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

Eliminate brown bear permits the following season, when a female bear is taken in Unit 8 as follows:

In Unit 8, if a resident or nonresident hunter kills a female brown bear in Kodiak bear management Units 8-16, the department will eliminate a permit from the management unit in which the harvest occurred during the next regulatory year. Permits will be eliminated from the corresponding nonresident or resident allocation, during the spring or fall season respectively.

**What is the issue you would like the board to address and why?** In 1994, the board responded to department concerns of a declining brown bear population in the southwest portion of Kodiak Island by passing a regulation that restricted the take of female brown bears. If a guided nonresident hunter killed a female brown bear with a skull that was not at least 9 inches wide or 15 inches long, the department eliminated a nonresident permit from that area during the next season. This regulation was in effect RY94-RY06.

The department has again expressed concerns about a decline in the brown bear population in the southwest portion of Kodiak Island (Kodiak bear management Units 8-16). This regulatory change is intended to reduce the overall harvest of female brown bears by both resident and nonresident hunters which may prevent further declines and allow for a more rapid recovery of the population.

**PROPOSAL 78**

**92.061 Special provisions for brown bear drawing permit hunts.**

Require all hunters to apply for Unit 8 brown bear drawing permits as follows:

Amend language in 5AAC 92.061 to close any existing loopholes, to absolutely require that all nonresidents or their guides **must** file a draw permit application and pay the fee during the application period in order to have an opportunity to hunt. An alternate list for cancellations may be implemented, but if there was no application and application fee received during the application period, you are not eligible to hunt that permit. There will be no over-the-counter tags awarded outside the draw permit process.

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

**Guides and their nonresident clients being allowed to intentionally “skip” the Kodiak brown bear draw permit process.**

Resident hunters must go through a “lottery” draw permit selection process with very low odds in order to have the opportunity to hunt brown bears on most of Kodiak Island. Residents must apply for a Kodiak brown bear draw permit during the Nov. 1 – Dec. 15 draw permit application period and pay an application fee for a chance to hunt, and many residents put in for decades without ever drawing a permit.

Nonresident guided hunters are allocated up to 40 percent of all Kodiak brown bear draw permits, but unlike residents they (or their guide) do not have to submit a draw permit application during the Nov. 1 – Dec. 15 application period or pay an application fee. They simply contact the guide with an exclusive guide concession within Kodiak National Wildlife Refuge, which encompasses most of the island, agree to a fee, sign a contract, then pick up an over-the-counter permit when they arrive on Kodiak.

Here are some examples of what is happening:

***“EXCLUSIVE! NO DRAWING KODIAK BROWN BEAR HUNT – GIANTS OF KODIAK ISLAND, ALASKA. SKIP THE PERMIT DRAWING PROCESS AND HUNT THE WORLD’S LARGEST BROWN BEARS!***

*We have a few openings for the ultimate bear hunt – Kodiak Island brown bears – and if you book with this outfitter, you can bypass the permit drawing process and start planning your trip now.”*

- Above is an advertisement from a well-known hunt booking agent in the Lower 48 (we have left out the name of the agent but are happy to provide copies of his March 2020 advertisement)

***“12-day spring Kodiak Island brown bear for 1 hunter. License and tag fees not included. DATES: This hunt must be scheduled for spring April 22 - May 4th, 2022. This includes travel days to and from camp. This hunt cannot be delayed.”***

- Above is a donated Kodiak brown bear hunt from a guide with concession on Kodiak National Wildlife Refuge for a hunt that was supposed be applied for during the previous year application period. Hunt was auctioned off in January 2022.

What is happening is also clearly evident by looking at the draw permit supplement results over the years for the DB 100 series of nonresident draw permits. Going down the list of the 2021 results there are many instances of zero applications received and zero permits awarded. Yet most all of those hunts were actually conducted by guides and their clients who chose to skip the draw permit process entirely. Other DB 100 series hunts list fewer applications than the total number of draw permits available, and most all of those hunts were conducted as well without going through the draw permit process.

For the 2021 DB 100 series of nonresident guided-only draw hunts, DB 107, 114, 116, 117, 122, 123, 137, 124, 125, 141, and 144 had zero applications. DB 105, 110, 113, 137, 140, 145, 149, 150, and 152 had fewer applications than the number of permits available.

In speaking with department staff, we were informed that this is not how the permit process is supposed to work and that guides who choose to skip the permit application process create headaches when they show up at a crowded time at the office expecting to pick up an over-the-counter permit for their client who did not go through the draw permit application process.

We submitted a similar proposal (#151) at the 2022 Statewide Board of Game (BOG) meeting that included other nonresident guided-only draw permit hunts on USFWS Refuge lands. Proposal 151 was widely opposed by guides and the guide industry, with guides saying that these permits do **not** go to the guides, while at the same time saying that they “take permits off the table” for their concession area for various reasons. How can a guide take a permit “off the table” if in reality the permit doesn’t actually go to the guide? This is semantics and **the truth is that guides on USFWS lands with exclusive concessions control the draw permits that are allocated to their specific concession area.** They can and do choose to use them or not use them as they see fit.

Guides also stated in opposition to Proposal 151 at the 2022 Statewide BOG meeting that if it was required for them or their client to turn in a draw permit application during the application period (as required!) it would somehow infringe on consumer protections to their clients, because any cancellations would then not allow them to choose an “alternate” client. But that is the reason for the “alternate list” described in the regulation that is not being followed.

Also at the 2022 Statewide BOG meeting, the department stated that Proposal 151 should be a regional proposal, so it could be considered specific to the regions it encompassed. Hence this proposal now before the board specific to Region II Unit 8.

#### **5AAC 92.061 Special provisions for Unit 8 brown bear permit hunts, reads:**

“In the Unit 8 general brown bear drawing permit hunt, the department shall issue permits, and a hunter may apply for a permit, as follows:

- (1) the department shall issue a maximum of 40 percent of the drawing permits to nonresidents and a minimum of 60 percent to residents; each guide may submit the same number of nonresident applications for a hunt as the number of permits available for that hunt;

(3) the department **shall** enter, in a guided nonresident drawing, each complete application from a nonresident who will be accompanied by a guide; the department may enter an application and issue a drawing permit for the general hunt only to a successful nonresident applicant who presents proof at the time of application that the applicant will be accompanied by a guide, as required in [AS 16.05.407](#) (a);

(4) the following provisions apply to a guided nonresident drawing under this section:

(A) an applicant for a guided nonresident drawing permit may apply for only one such permit per application period;

(B) **after the successful applicants have been selected by drawing**, the department shall create an alternate list by drawing the remaining names of applicants for a specific hunt and placing the names on the alternate list in the order in which the names were drawn;

(C) if a successful applicant cancels the guided hunt, the person whose name appears first on the alternate list for that hunt shall be offered the permit; if an alternate applicant fails to furnish proof that the applicant will be accompanied by a guide, the permit must be offered in turn to succeeding alternate applicants until the alternate list is exhausted;

(D) **if a guided nonresident drawing permit is available, but the alternate list is exhausted**, the permit becomes available, by registration at the Kodiak ADF&G office, to the first applicant furnishing proof that the applicant will be accompanied by a guide;” [our emphasis]

What is going on has nothing to do with any “alternate list.” Draw permit applications are purposely not being submitted during the application period, even though the regulation states that the department “shall” enter each complete draw permit application from a nonresident who will be accompanied by a guide. The only way there can be an alternate list according to the regulation is “after the successful applicants have been selected by drawing.”

This loophole that allows guides and their nonresident clients to skip the draw permit process and have a 100 percent opportunity to hunt needs to be fixed. The abuse of the current regulation was never intended but is now widespread to the point it has become a norm for many guides and their clients. To mandate that resident hunters go through a draw permit lottery process in order to have a chance for the opportunity to hunt one of the most iconic brown bear populations in the world, yet allow nonresident hunters with enough money to bypass such a lottery process and have a 100 percent opportunity to hunt is clearly not constitutional.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F22-022)

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**PROPOSAL 79**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

Transfer under-subscribed nonresident brown bear permits for Unit 8 to the resident allocation as follows:

Any hunt area DB101-DB193 tag not applied for by a nonresident, that tag will be placed into an alternate pool list and awarded to a resident hunter, or the tag will be placed into the corresponding DB201-293 resident application pool the following regulatory year.

**What is the issue you would like the board to address and why?** Hunt area DB101-DB193 nonresident tags are not always hunted. If they do not, then the opportunity should be given to a resident hunter.

**PROPOSED BY:** Christopher Wallstrum (EG-F22-036)  
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**PROPOSAL 80**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

Adjust the allocation for Unit 8 brown bear permit hunts, DB101 - DB193, as follows:

Any Kodiak hunt draw permit area DB101 - DB193 cannot be allocated over the current average .35% of the tags in an individual hunt.

**What is the issue you would like the board to address and why?** The tag allocation in hunt areas DB101-DB193 is not close to equal amongst each area. The distribution is between 20%-44%. Why the disparity? The allocation of some areas need to go up and others need to go down to get them closer to equal to distribute the resident and nonresident tag allocation more equal.

**PROPOSED BY:** Christopher Wallstrum (EG-F22-037)  
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**PROPOSAL 81**

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

Require all snares set on the Kodiak road system to include breakaway mechanisms as follows:

On the Kodiak road system, all snares must be equipped with a breakaway mechanism (of a designated minimum poundage) on the loop end of the snare and the snare cable and anchor must be stronger than the breakaway mechanism.

This change was proposed last cycle by the Kodiak Fish and Game Advisory Committee (Southcentral Region meeting: March 14–19, 2019; Proposal 109). Proposal 109 found broad community support, but ultimately failed on a split 3-3 vote by the board. Since that time, the number of incidents and volume of community discussion related to this issue has only increased. The inclusion of appropriately sized breakaway mechanisms would allow trappers to continue targeting furbearers with snares along the Kodiak road system while reducing catch of non-target

animals, promoting responsible trapping practices, and reducing user group conflict. Inclusion of breakaway mechanisms is not expected to significantly increase direct costs for an individual to participate in trapping activities.

The Humane Society of Kodiak is not a member of, nor formally affiliated with, the Humane Society of the United States or the American Humane Society.

**What is the issue you would like the board to address and why?** There has been an increase in catch of non-target animals in snares set along the Kodiak road system, including bears, deer, and domestic animals. The main concern is with locking style snares that do not incorporate breakaway mechanisms. Snares without breakaway mechanisms cause severe injury or death to non-target animals, resulting in increased mortality of valuable game resources (i.e., bears and deer) and conflicts between trappers and other user groups, particularly when domestic animals (i.e., dogs and livestock) are involved.

**PROPOSED BY:** Humane Society of Kodiak Board of Directors (EG-F22-131)  
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# **Anchorage Area Proposals – Unit 14C**

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## **PROPOSAL 82**

### **5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Expand the Unit 14C northeast sheep drawing hunt areas to include the East Fork Eklutna hunt area as follows:

Add East Fork Eklutna area, former hunt numbers DS127, DS128 and DS129 to the Unit 14C northeast unit hunt numbers DS124, DS125 DS126 and DS224.

**What is the issue you would like the board to address and why?** The East Fork Eklutna area, hunt numbers DS127, DS128 and DS129 has been closed to rifle sheep hunting since a least 2012. The only open season is for the late areawide bow season DS140 and DS240. There was a massive die off in the winter of 1998-1999 and the sheep population continued to decline until there was no full curls in the unit and it was closed in 2011 or 2012. In the last four years there has been a number of rams that have been in the unit with three or four being mature full curls but rifle hunters had no open season to hunt them. It hasn't been consistent enough in my opinion to issue permits just in the East Fork Eklutna. I would like to see the East Fork Eklutna area added to the adjoining area in Unit14C northeast unit hunt numbers DS124, DS125, DS126 and DS224 without increasing the permits in the area unless the department thinks there is enough rams to do so. This would allow hunters more opportunity and more area to hunt and better access without putting more pressure on the resource.

**PROPOSED BY:** Dan Montgomery (EG-F22-070)

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## **PROPOSAL 83**

### **5 AAC 85. 055. Hunting seasons and bag limits for Dall sheep.**

Reopen the late rifle hunt for sheep in Unit 14C and redistribute the existing permits to not increase the total take of rams as follows:

Reopen the late areawide rifle season DS139 but don't increase the total number of permits issued by taking some permits from DS132-one permit, DS137- one permit, DS138 - two permits and eliminating DS232.

The new hunt structure would be as follows:

DS132 - 5 resident permits

DS137 - 7 resident permits

DS138 - 6 resident permits

DS139 - 4 resident permits

DS239 - 1 nonresident permit

DS232 - Eliminated for now but could be issued again if the sheep population in the area increases and the permits for all hunters are increased for this area.

**What is the issue you would like the board to address and why?** I would like to see the areawide late rifle season DS139 reopened. DS139 did not include the hunt areas of DS123 and it would not include them now. The season dates were Sept. 18 to Sept. 30. This hunt was discontinued in 2012 because of a sharp decline in the sheep population and the department was issuing 20 permits and there was too much pressure on the rams. The population has stabilized now but there can be a lack of legal full curl rams in the late hunts in the Ship Creek unit hunts DS138 - eight resident permits and DS238 - one nonresident permit and the Peters Creek unit hunts DS132 - six resident hunters and DS232 - one nonresident hunter. At the same time we have observed a surplus of 10 year-old plus rams in the Upper Eagle River unit and the northeast - Hunter Creek unit lately. It would be beneficial to all hunters to have a very limited increased access to these other areas and the rams in them. By closing DS139 in 2012, it also prevented the governor's permit holder from hunting this time period. My proposal would be to open DS139 again but not to increase the number of permits issued overall but to take some of the later season permits from DS137 - one resident permit, DS138 - two resident permits, DS132 - one resident permit and DS232 - one nonresident permit and take these five permits, four resident and one nonresident and place the four resident permits in DS139 and the one nonresident permit in DS239. I would also recommend never increasing the number of permits for these two hunts. These permit holders would still be able to hunt the original areas if they wanted to but also the three additional areas. Weather can be very harsh this time of year and I think there will be a very low success rate for this hunt. There is a 13.5% nonresident permit allocation for Unit 14C and this change would keep the permit allocation in compliance with that.

**PROPOSED BY:** Dan Montgomery (EG-F22-071)  
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**PROPOSAL 84**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create a new archery only, drawing hunt for sheep in Unit 14C, that portion within the Eklutna River drainage area as follows:

I propose to create another tag that runs Aug. 5 - 12 to allow better opportunity as well as experience for bowhunters. This would cover the same areas as DS141. If permitted, ADF&G biologists can decide tag allotment between this new tag and DS141. I would be open to taking tags from DS141 and moving to this new tag. Currently, DS141 has 24 tags allotted. Splitting to 12 and 12 or whatever the board decides, would be beneficial.

Bow only draw tag for sheep hunt area: that portion of Unit 14C within the Eklutna River drainage upstream of the Eklutna River closed area excluding the East Fork Eklutna River.

Bowhunters: must be IBEP (International Bowhunters Education Program) certified prior to hunting in DSXXX. Call ADF&G for more information.

Hunt Area: that portion of Unit 14C within the Eklutna River drainage upstream of the Eklutna River closed area excluding the East Fork Eklutna River.

Season Dates Aug. 5 - 12.

Tag Allotment: Per ADF&G and/or Board of Game referral as stated above.

**What is the issue you would like the board to address and why?** I have hunted DS141 (archery only Sept. 1 – Sept. 30) multiple times. Although the tag appears to cover a substantial area, the sheep are concentrated to small areas within the unit. I have experienced hunters hunting directly on top of each other. It takes away from the experience of the hunt and puts higher stress on the sheep population. There is also a rifle hunt adjacent to DS141 (DS 124) that runs August 10 - 22. Hunters often access this area via the DS141 tag area and push the sheep up and out of DS141, into DS124.

**PROPOSED BY:** Brian Watkins (EG-F22-007)  
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**PROPOSAL 85**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Create an archery only drawing hunt for goat in Unit 14C, within the drainage of the West Fork of Eklutna River as follows:

Bow only draw tag for goats:

Hunt Area: Unit 14C, West Eklutna, within the drainage of the West Fork of the Eklutna River.

Bowhunters: must be IBEP (International Bowhunters Education Program) certified prior to hunting in DGXXX. Call ADF&G for more information.

Season Dates Sept. 1-Oct. 15.

Taking of a nanny accompanied by a kid is prohibited.

HUNTERS SHOULD TRY TO TAKE MALE GOATS

**What is the issue you would like the board to address and why?** In my time spent in the West Fork of the Eklutna River, I have observed a population of goats within the West Fork of the Eklutna River. This area is adjacent to DG852, so ADF&G biologists would have to advise on tag allotment. There are not many goat only bow opportunities in Alaska that I am aware of. I would like a bow only tag in this area.

**PROPOSED BY:** Brian Watkins (EG-F22-010)  
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**PROPOSAL 86**

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

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C as follows:

	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<b>Seasons and Bag Limits</b>		

(5)

...

Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage

RESIDENT HUNTERS:

1 moose by drawing permit only; up to 60 permits for bulls will be issued in combination with nonresident hunts, and up to 70 permits for antlerless moose will be issued; or

Aug. 20—Oct. 10  
(General hunt only)

...

**What is the issue you would like the board to address and why?** Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorizing the antlerless hunt in Units 7 and 14C. The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters and sharp reductions during severe winters. In 2009, antlerless permits were issued for the first time since 2004. The number of permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A December 2021 aerial composition count of moose in the Twentymile, Portage, and Placer River drainages found 185 moose with a bull:cow ratio of 36 bulls per 100 cows and a calf:cow ratio of 19 calves per 100 cows. This is an increase when compared to the December 2020 count, which found 153 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 14 calves per 100 cows, and the December 2016 count which found 153 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 18 calves per 100 cows.

The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. The moose population will be healthier and more productive due to decreased stress levels associated with winter food shortages. This hunt has been successful in creating additional moose hunting opportunity with little or no controversy.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-055)

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**PROPOSAL 87**

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

Establish a general moose season open for take by bow and arrow only, in Unit 14C Remainder as follows:

Unit 14C Remainder

Residents and nonresidents

**One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side, by bow and arrow only Aug. 22-Aug. 29**

**OR**

One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side Sept. 1 - Sept. 30.

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would precede the current general season which, combined with the already existing antler restrictions and limits of archery equipment, would add to the difficulty in harvest and limit impact on moose populations. This hunt would mirror almost exactly the existing bow and arrow only seasons in Units 15A Remainder and 15B Remainder.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-121)

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**PROPOSAL 88**

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

Change the registration moose hunt, RM445, in the Chugach State Park Management Area in Unit 14C to an archery only hunt as follows:

*Chugach State Park Management Area (excluding Ship Creek drainage):*

**One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by bow and arrow only by certified bowhunters.**

*September 1 - 30*

**What is the issue you would like the board to address and why?** The Chugach State Park Management area is currently open to moose hunting from September 1 - 30 for one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines on at least one side. Much of this area is prohibitively remote for ethical moose hunting but the areas that are accessible are close to very popular multi use trails and pathways. This creates potential for hunter/non-hunter conflict and the potential for accidents when using long range centerfire rifles around populated areas and heavily used trails.

In addition, there are currently limited opportunities for local hunters who wish to pursue moose with bow and arrow, the exception being RM445 where many years of archery hunting close to a heavily used trail has set a positive precedent. Unfortunately, RM445 is very heavily hunted because so many local hunters enjoy the challenge of archery hunting for moose.

One solution to these issues would be to transition the Chugach State Park Management area, or at least a large portion of it, to archery only for moose hunting. This would likely be a popular hunt given the proximity to Anchorage and the increasing popularity of archery hunting for moose but given the limited range of archery equipment would also not increase the overall harvest of moose in the area.

As with all archery only hunts, it should be reiterated that this hunt would not decrease any hunting opportunity for any Alaska resident or nonresident. It would simply require that hunters who wish to use these areas do so with archery equipment.

**PROPOSED BY:** Paul Forward (EG-F22-152)  
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**PROPOSAL 89**

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

Reauthorize the antlerless moose seasons in Unit 14C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		

Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
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1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued

Unit 14(C), that portion of the Ship Creek drainage upstream of the Joint Base Elmendorf-Richardson (JBER) Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
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...

Remainder of Unit 14(C)

1 moose per regulatory year, only as follows:

...

1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
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...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually, and the department recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population level, which has been demonstrated to reduce over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and starvation during severe winters. These hunts have also been successful in providing additional moose hunting opportunities in the state’s human population center with little controversy.

The number of antlerless permits issued depends on the current population level and bull:cow ratios, as well as estimated winter mortality. A combined 2021 aerial composition count of the Joint Base Elmendorf Richardson Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14C found 301 moose with a bull:cow ratio of 44 bulls per 100 cows and a calf:cow ratio of 20 calves per 100 cows. In 2020, a survey of the same area found a total of 242 moose with bull:cow and calf:cow ratios of 30:100 and 25:100, respectively. Compared to the 2013 survey, which found 225 moose with a bull:cow ratio of 39 bulls per 100 cows and a calf:cow ratio of 20 calves per 100 cows, little change has occurred. In addition, harvest numbers have remained relatively steady, indicating that the population level has likely not changed dramatically. At this population level, there are few reports of human-moose conflicts and of winter mortalities. Harvesting cow moose is paramount to maintaining the population at the low end of the objective while providing harvest opportunity.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-054)  
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**PROPOSAL 90**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Establish a primitive weapons hunt or any weapons hunt for black bear in the West Fork of Eagle River Drainage in Unit 14C as follows:

Hunt Area: Unit 14C, South Fork Eagle River: all drainages into South Fork Eagle River, excluding that area within ½ mile of a developed facility. Black bear.

**What is the issue you would like the board to address and why?** The West Fork of Eagle River drainage is known for having a substantial population of bears. There have been several known bear attacks. The latest in June 2018. I have a view of the north facing side of Highland Mountain and consistently see brown and black bears on that mountain in the fall. It's important we hunt bears in this area to maintain their fear of human encounters. I would like the Board of Game (BOG) to either implement a primitive weapons hunt or an any weapons hunt in this area. Season dates and tag allotment to be determined by ADF&G biologists. Recommended by submitter to be the same dates as DL457 (Oct. 1-31) to alleviate hunter/hiker encounters. I am intentionally separating black and brown bears for this submission for deliberation within BOG and tag allotment by ADF&G biologists.

**PROPOSED BY:** Brian Watkins (EG-F22-011)  
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**PROPOSAL 91**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Add bow and arrow to the legal means of take for the DL455 black bear hunt in Unit 14C, Joint Base Elmendorf-Richardson as follows:

DL455

Unit 14C, portions of Joint Base Elmendorf-Richardson Management Area (former Fort Richardson portion)

One bear by shotgun **or bow and arrow** only by permit Sept. 1-June 15

**What is the issue you would like the board to address and why?** Drawing permit hunt DL455 already allows the take of one black bear by shotgun only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. There are currently multiple archery hunts that already take place on the Joint Base Elmendorf-Richardson (JBER) and there is no reason DL455 should exclude archery equipment. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun or a bow rather than only being limited to using a shotgun.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-125)  
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**PROPOSAL 92**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Add bow and arrow to the legal means of take for the DL457 black bear hunt in Unit 14C, McHugh Creek area as follows:

DL457

Unit 14C, McHugh Creek

One bear by **bow and arrow**, shotgun or muzzleloader only by permit Oct. 1-Oct. 31

**What is the issue you would like the board to address and why?** Drawing permit hunt DL457 already allows the take of one black bear by shotgun or muzzleloader only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun, muzzleloader, or a bow rather than only being limited to using a shotgun or muzzleloader.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-127)  
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**PROPOSAL 93**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Allow certified bowhunters to participate in DL455 and DL457 black bear hunts in Unit 14C, Joint Base Elmendorf-Richardson and McHugh Creek areas as follows:

Add certified bowhunters to applicants for drawing hunts DL455 and DL457.

“...(3) Unit 14(C), JBER Management Area 1 bear every regulatory year, by drawing permit Sept. 1 – June 15 Sept. 15 - June 15 only; by shotgun **and archery** only; (General hunt only) up to 25

permits may be issued Unit 14(C), that portion Sept. 1 - May. 31 known as the Anchorage (General hunt only) Management Area 1 bear by drawing permit only. shotgun, **archery**, or muzzleloader only; weekdays only; up to 20 permits may be issued in the McHugh Creek area and up to 20 permits may be issued in the Upper Campbell Creek area...”

The option to also hunt with a shotgun or shotgun/muzzleloader would remain unchanged, allowing for follow up shots (if needed). This solution presents arguably less wounding loss potential than archery-only hunts (e.g., DM424).

**What is the issue you would like the board to address and why?** Low participation and hunter success in Unit 14C black bear drawing hunts. The current regulations limit hunters to shotgun and shotgun/muzzleloader only in DL455/457, respectively. This deters a large pool of certified black bear archery hunters from applying to hunt this underutilized resource in an area that already has a successful archery hunt for moose.

**PROPOSED BY:** Bryce Eckroth (EG-F22-114)  
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**PROPOSAL 94**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**  
**5 AAC 92.530. Management areas.**

Open a black bear archery drawing hunt in the McHugh Creek hunt area in the Unit 14C, Anchorage Management Area as follows:

Open a black bear drawing archery hunt in the existing area within the DL457 McHugh Creek hunt area. Weekday hunt only with season dates from September 1 through May 31.

**What is the issue you would like the board to address and why?** Provide more hunting opportunities for archery black bear hunts in Unit 14C.

**PROPOSED BY:** Matt Moore (EG-F22-138)  
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**PROPOSAL 95**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**  
**5 AAC 92.530. Management areas.**

Open a resident only, limited registration black bear archery hunt in McHugh Creek hunt area in the Unit 14C Anchorage Management Area as follows:

Open a resident only, limited participation, black bear registration archery hunt in the existing area within the DL457 McHugh Creek hunt area. Weekday hunt only with season dates from September 1 through May 31.

**What is the issue you would like the board to address and why?** Provide additional black bear hunting opportunities of resident archers in Unit 14C.

**PROPOSED BY:** Matt Moore (EG-F22-137)  
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**PROPOSAL 96**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.530. Management areas.**

Establish a black bear archery hunt in Unit 14C, the Joint Base Elmendorf-Richardson management area for hunters who also draw an archery moose tag as follows:

Add a black bear archery registration hunt for residents and nonresidents in the Joint Base Elmendorf-Richardson management hunt area. These registration permits would be made available only to those hunters who draw a moose tag and hunt by bow and arrow. The permits and hunt period would remain valid while the moose draw tag is valid.

**What is the issue you would like the board to address and why?** Provide more black bear archery hunting opportunities in Unit 14C. This is specifically for archers who have drawn a moose tag and could take a black bear while in the field if the opportunity presented itself. It is another way/opportunity to reduce the black bear predation on moose calves in Unit 14C.

**PROPOSED BY:** Matthew Moore (EG-F22-140)

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**PROPOSAL 97**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

**5 AAC 92.530. Management areas.**

Establish a primitive weapons hunt or any weapons hunt for brown bear in the West Fork of Eagle River Drainage in Unit 14C as follows:

Hunt Area: Unit 14C, South Fork Eagle River: all drainages into South Fork Eagle River, excluding that area within ½ mile of a developed facility. Brown bear.

**What is the issue you would like the board to address and why?** The West Fork of Eagle River drainage is known for having a substantial population of bears. There have been several known bear attacks. The latest in June 2018. I have a view of the north facing side of Highland Mountain and consistently see brown and black bears on that mountain in the fall. It’s important we hunt bears in this area to maintain their fear of human encounters. With the increase in hiking post-pandemic, there is an increased likelihood of hiker/bear encounters. I would like the Board of Game (BOG) to either implement a primitive weapons hunt or an any weapons hunt in this area. Season dates and tag allotment to be determined by ADF&G Biologists. Recommended by submitter to be the same dates as DL457 (Oct. 1 - 31) to alleviate hunter/hiker encounters. I am intentionally separating black and brown bears for this submission for deliberation within BOG and tag allotment by ADF&G biologists.

**PROPOSED BY:** Brian Watkins (EG-F22-012)

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**PROPOSAL 98**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

**5 AAC 92.530. Management areas.**

Open a hunt for brown bear within the Rainbow Creek drainage in Unit 14C as follows:

Hunt Area: Unit 14C, Rainbow creek: all drainages into Rainbow, excluding that area within a 1/2 mile of the Seward Highway or within 1/2 mile of a developed facility. Brown bear.

**What is the issue you would like the board to address and why?** In the last cycle of the Board of Game (BOG) meetings for Unit 14C, the BOG deliberated on Rainbow Creek drainage. The way it was written was for black bears, but biologists said it is not an area where black bears frequent. They said the area is frequented by brown bears. After discussion, this was rejected instead of amended by the BOG, so I am submitting with brown bears. With the increase in hiking post-pandemic, there is a likelihood of hiker/bear encounters. To get ahead of the issue, there should be a draw tag within the Rainbow Creek drainage. Season dates and tag allotment to be determined by ADF&G biologists. If primitive weapons will help to get the tag accepted, submitter agrees to that.

**PROPOSED BY:** Brian Watkins (EG-F22-013)

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**PROPOSAL 99**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

**5 AAC 92.530. Management areas.**

Open an archery drawing hunt for brown bear in Unit 14C, the McHugh Creek area for residents and nonresidents as follows:

Open a drawing hunt for archery brown bear in same hunt area as DL457 hunt. Proposal is written for a weekday hunt only with season dates from September 1 through May 31.

**What is the issue you would like the board to address and why?** Provide additional brown bear hunting opportunity in Unit 14C.

**PROPOSED BY:** Matt Moore (EG-F22-139)

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**PROPOSAL 100**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

**5 AAC 92.530. Management areas.**

Establish an archery only drawing hunt for brown bear in Unit 14C, Joint Base Elmendorf-Richardson area, with a bag limit of one bear every four regulatory years as follows:

Provide an archery only drawing hunt for both residents and nonresidents. One bear every four regulatory years by bow and arrow only. Season to be open from September 1st through May 31st.

**What is the issue you would like the board to address and why?** Create an archery brown bear hunting opportunity on Joint Base Elmendorf-Richardson management area.

**PROPOSED BY:** Matt Moore (EG-F22-141)  
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**PROPOSAL 101**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the general season for brown bear, open for take by bow and arrow only, in Unit 14C Remainder as follows:

Unit 14C, Remainder

Residents and Nonresidents

One bear every regulatory year, Sept. 1 – May 31

**OR**

**One (1) brown bear, every regulatory year, by bow and arrow only June 1-June 30**

**What is the issue you would like the board to address and why?** Adding additional hunting days that are restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. Members of our organization have reported seeing a rise in brown bear activity in remote areas of Unit 14C Remainder while pursuing black bears. These members report often seeing more brown bears than black bears in this area and would like additional time to pursue them during the spring season. We believe that this extension can be accomplished without having a big impact on brown bear populations if it is restricted to the use of archery equipment only. Unit 14C Remainder is already remote, and hunters willing to access these areas are not numerous. The limited access as well as the limits of archery equipment would add to the difficulty in harvest, limiting impact on brown bear populations while also providing more opportunity for hunters to pursue bears.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-124)  
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**PROPOSAL 102**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Lengthen the season for brown bear in Unit 14C Remainder as follows:

Unit 14C, Remainder

Residents and Nonresidents

One bear every regulatory year **Sept 1 - June 15** [Sept 1 - May 31]

**What is the issue you would like the board to address and why?** Unit 14C Remainder is remote and at times, snow conditions don't allow access until later in the spring season. There appears to be a VERY healthy population of brown bears in this area and an additional two weeks of season does not seem to be a big ask. While hunting black bears in early June but seeing mostly brown bears, it would be nice to be able to attempt to take one.

**PROPOSED BY:** Landon Albertson (EG-F22-157)  
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**PROPOSAL 103**

- 5 AAC 85.015. Hunting seasons and bag limits for black bear.**
- 5 AAC 85.020. Hunting seasons and bag limits for brown bear.**
- 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**
- 5 AAC 92.530. Management areas.**

Establish a bear bait hunt in Unit 14C, the McHugh Creek drainage area for black and brown bear as follows:

(1) Station for bear baiting for brown and black bears in Unit 14C McHugh Creek Drainage area starting May 1 through June 15. Up to six certified users of the bait station shall operate the bait station by registration permit.

**What is the issue you would like the board to address and why?** Create a bear bait hunt within the Chugach State Park for brown and black bears. The area proposed is around the McHugh Creek area. Exact location of the bait station will be approved by ADF&G to help eliminate dangerous encounters with bears and recreational users of the park. The purpose of the proposal is to help reduce the overall number of bears on the hillside through conservation. After speaking with ADF&G biologists, a large number of bear are present in this area. Over the years there has been encounters with bears that have taken the lives of people using the park for recreational purposes. After a recent encounter ADF&G had to kill several bears when a 14-year-old boy was stalked and eaten by a bear. By using a bait station for hunting bears, the chances of wounding a bear is greatly reduced because the bears are lured in to close range and are usually moving slow or standing still for the hunter to take the shot. The location of the bait station will lure the bears away from heavily used trails and help prevent these dangerous encounters. If this proposal does not pass more dangerous encounters and possible deaths may occur. The bear population will increase and put more pressure on ADF&G staff to control population growth.

**PROPOSED BY:** Phillip Calhoun (EG-F22-135)  
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**PROPOSAL 104**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.060. Hunting seasons and bag limits for fur animals.**

Close Chugach State Park and Glacier Creek drainage in Unit 14C to lynx hunting and trapping as follows:

I am recommending the closure of all of Chugach State Park plus the Glacier Creek drainage be closed to hunting and trapping of lynx. The regulatory language I propose is as follows:

5 AAC 85.060(4) Lynx Units 6, 7, 11, 13 - 16 (General hunt only) Nov. 10 - Feb. 28 except that all of Chugach State Park and the Glacier Valley drainage are closed.

5 AAC 84. 270(5) Lynx Units 7, 11, and 13 - 16 Nov. 10 - Last day of Feb. No limit: season may be closed by emergency order; except that all of Chugach State Park and the Glacier Creek drainage are closed.

**What is the issue you would like the board to address and why?** Thousands of Alaskans who live in and around Anchorage currently have the rare opportunity to see lynx in the wild in the Anchorage bowl and Eagle River drainage, including at the Eagle River Nature Center. Videos of these cats often appear in social media, and on commercial tv. These cats are truly a premier species of watchable wildlife. These rare opportunities exist primarily because the Anchorage bowl, Joint Base Elmendorf-Richardson (JBER), the Eagle River drainage, and large parts of the Eklutna drainage are currently closed to the hunting and trapping of lynx. and because most of the rest of Unit 14C is closed to lynx hunting and trapping by emergency order in those years when population numbers are low. But much of Unit 14C is open to the hunting and trapping of lynx, and was not closed by emergency order in 2021 - 2022. The areas permanently closed to hunting and trapping lynx should be expanded to include all of Chugach State Park and also the Glacier Creek drainage. (Most of the Glacier Creek drainage is outside Chugach State Park.) The purpose would be to increase the opportunity for residents and visitors to see these cats in the wild, and to provide a larger refuge. The value of these watchable wildlife to the thousands of people who are thrilled by the occasional glimpse exceeds the value of these cats to a handful of hunters and trappers. These animals are a publicly owned resource owned by all Alaskans, and their highest and best use is as watchable wildlife

**PROPOSED BY:** Kneeland Taylor

(EG-F22-033)

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# **Kenai Peninsula Area - Units 7 & 15**

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## **PROPOSAL 105**

### **5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Limit hunters to one big game registration permit at a time in Units 7 and 15 as follows:

Add Units 7 and 15 to the areas in regulation that hunters are limited to one big game registration permit at a time.

5 AAC 92.052 (19) a person may be limited to one big game registration permit at a time in Units 1, **7 and 15**, 17, 20(E), 22, and 23.

**What is the issue you would like the board to address and why?** In Units 7 and 15, there are currently registration goat hunts with limited permit numbers. Each year some hunters pick up more than one registration permit even though it is physically impossible to hunt more than one area at a time. When hunters do this it takes opportunities away from other hunters.

**PROPOSED BY:** Tom Young (EG-F22-025)

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## **PROPOSAL 106**

### **5 AAC 92.540(4). Controlled use areas.**

Modify the restrictions for using ATVs to hunt moose in Unit 15C as follows:

Change to delete the restrictions totally.

Change restrictions to read: ATV uses every other week unrestricted.

Change restrictions to read: ATV use every 3 days unrestricted.

**What is the issue you would like the board to address and why?** I am a retired disabled Veteran with limited mobility. For at least 23 years, the Alaska Board of Fish and Game has discriminated against disabled Veterans and disabled Americans, for limited use of All Terrain Vehicles on limited dates in Unit 15C. Oftentimes, not everybody can get off or schedule limited time to go moose hunting in our home area. Why are we, as disabled Alaskans being penalized? I have been doing some research on this matter and found out this rule/regulation was intended for a few guides that use horses for guiding hunters back into Unit 15C. I have also talked to AK Wildlife Troopers and state game biologists advising me to request a change to the regulation. As we all get older, our mobility gets harder. There are a lot of existing trails in the area that can be used.

**PROPOSED BY:** John Reich (EG-F22-002)

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**PROPOSAL 107**

**5 AAC 92.540(5)(b). Controlled use areas.**

Allow an exemption for disabled Veterans to hunt in the Lower Kenai Controlled Use Area in Unit 15C using motorized vehicles as follows:

A veteran upon providing proof of a service-connected disability of 50% or more, may receive an exemption to the "Controlled Use Area ATV restrictions".

**What is the issue you would like the board to address and why?** The Lower Kenai Controlled Use Area in Unit 15C restricts the use of motorized vehicles during the latter days of the hunting season which prevents many disabled Veterans from accessing the hunting grounds. For a disabled Veteran to access the hunting grounds without motorized means essentially eliminates all access for a disabled Veteran who cannot walk or ride a horse. Without a change this restriction will continue to prevent a disabled Veteran from providing for one's family as well as improving the quality of life the Disabled Veteran can still enjoy.

I would like to see some consideration of exempting a verified disabled Veteran with a service-connected disability of 50% or more from this restriction. This change would provide an increased opportunity for those veterans who have already given to this country and now carry the scars of such service.

**PROPOSED BY:** Robert Ward (EG-F22-005)

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**PROPOSAL 108**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Make all sheep hunts in Units 7 and 15 registration as follows:

Make all Dall sheep hunts in Units 7 and 15 registration hunts. This would give managers the ability to open or close areas based on survey data and allow potential harvests to be aligned with actual sheep numbers, contributing to overall hunt quality for participants.

**What is the issue you would like the board to address and why?** Dall sheep numbers on the Kenai Peninsula have been in drastic decline for a number of years. General season sheep openings are not sustainable given the scarcity of legal rams.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-063)

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**PROPOSAL 109**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Close sheep hunting on the Kenai Peninsula, Unit 15 as follows:

An easy way to fix the problem would be to simply shut it down. Like I said, it would not affect many hunters and I think you must put the animals first.

**What is the issue you would like the board to address and why?** I think the sheep hunting on the Kenai Peninsula should be shut down. There are few sheep spread thinly throughout the Kenai Peninsula and if you did shut it down it would only affect a small group of hunters. About five sheep are taken a year and two of which are not legal. These five sheep taken could really help the sheep population in the long run and some day you might have a good sheep population. Thanks for your consideration.

**PROPOSED BY:** Rockwell Bates (EG-F22-054)  
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**PROPOSAL 110**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create an archery only registration hunt and youth hunt for sheep in Unit 7 Remainder as follows:

Unit 7 Remainder:

One ram with full curl horn or larger by **Bow and Arrow for certified bowhunters** only; August 10 - September 20.

One ram with full curl horn or larger, by **Bow and Arrow only for certified bowhunters**. Youth hunt only; August 1 - 5.

**What is the issue you would like the board to address and why?** Over the past decade the Unit 7 sheep harvest has decreased to 1 - 3 rams harvested on average per year and about 40 hunters per year hunting the area. In addition, the average ram size ranges in the low to mid 30” range suggesting that rams are being harvested shortly after they first reach legal size. In addition, there is currently no archery sheep hunting area in the entire state of Alaska aside from a narrow corridor along the Dalton highway, very far from where most hunters live. Creating an archery only sheep hunting area would have multiple benefits.

First, it would allow for a place for hunters to safely hunt sheep with a bow without worry of long range shooters shooting over them while stalking. Archery hunters would also much less likely to interrupt each other while on a stalk or approach due the increased observation time and stalking time required.

Second, the existing archery registration hunts, in areas with high concentrations of rams and easy access, have consistently shown that archery sheep hunts allow for increased hunter opportunity while having very little affect on actual sheep populations. This would allow for rams to grow older on average increasing horn size and increasing age diversity in the population. (Of note, research is currently underway in in Alaska to determine if there is a population benefit from having larger numbers of rams and older rams.)

Third, much of Unit 7 is composed of very high use trails and waterways and limiting hunting to short range weapons in this areas will decrease potential or user conflict. Archery hunts have been used with good success in other parts of the state that are more heavily used with good community acceptance.

Fourth, there is a precedent in British Columbia and Alberta for archery only sheep hunting areas and both remain very popular as places where hunters can enjoy the adventure of sheep hunting

with a bow each year with opportunities at legal rams in relative proximity to road systems and populated areas.

Fifth, after a few years of archery only seasons and the subsequent increase in survival of mature rams, this hunt would likely become very popular with sheep hunters, many of whom would welcome the chance to challenge themselves by hunting with archery equipment. This could potentially draw pressure off of other units where sheep populations are known to be suffering and hunter conflict has become more common.

**PROPOSED BY:** Paul Forward (EG-F22-147)  
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**PROPOSAL 111**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create an archery only, registration sheep hunt for residents and nonresidents in Units 7 and 15 Remainder as follows:

**Unit 7 and 15 Remainder: Resident: One ram, with full curl horn or larger, by bow and arrow only from August 1 - August 5, by registration permit available at <http://adfg.alaska.gov>. Certified bowhunters only.**

**Unit 7 and 15 Remainder: Nonresident: One ram, with full curl horn or larger, by bow and arrow only, every four regulatory years from August 1 - August 5, by registration permit available at <http://adfg.alaska.gov>. Certified bowhunters only.**

**Aerial scouting is not allowed during this time period.**

**What is the issue you would like the board to address and why?** There is an increasing interest in bowhunting opportunities for Dall sheep in Alaska but, aside from very low odds draw tags, there are currently no archery seasons or areas for sheep hunting in the Southcentral. This is a proposal for a resident and nonresident, August 1 – August 5 registration archery season for full curl Dall Sheep in Units 7 and 15 Remainder.

During the regular rifle season, bowhunting is difficult to safely achieve given the overall popularity of sheep hunting and the ability of rifle hunters to take very long shots. Bowhunters often spend many hours to days attempting to get within bow range of a particular ram and rifle hunters can easily interfere with any chance of a successful bow hunt. In the worst case, it’s even possible for rifle hunters to unknowingly shoot over the backs of bowhunters stalking sheep, especially in more popular and easily accessible areas.

In addition, there are many nonresident bowhunters who would welcome an opportunity for a guided bow hunt outside of the regular sheep season. Such a season would provide additional revenue for guiding operations and make Alaska a more competitive and appealing option for nonresidents bowhunters planning to book a sheep hunt.

In the past, early bow seasons were rejected by the Board of Game, in part, because of concern that bowhunters would push sheep out of certain areas just prior to the season. In this proposal the bow season would match the existing youth season, August 1 – August 5, thereby giving the sheep

a five-day break from hunting all pressure prior to the general season.

A bowhunting season in Units 7 and 15 Remainder would provide a wonderful opportunity for bowhunters to spend time safely in the mountains and is very unlikely to impact sheep populations and numbers of legal rams. Over the ten-year period from 2009-2018 bowhunters killed about 1% of legal rams taken in the Alaska's general season. Even in the DS140/141 and DS240/241, which are bowhunting only draw hunts for *any ram* in an easily accessible area, the success rate over the same ten-year period was about two – three rams per year for almost 70 tags awarded each year, and only a small fraction of the rams that were killed in these hunts would be considered legal in a full curl only area.

Combined with a short season that is separated from the general season by five days and a very low projected success rate, there is no downside to allowing bowhunters an opportunity to safely pursue sheep each season in this region. It would simply allow bowhunters a short window each year to pursue sheep in a safer and more enjoyable fashion.

Making this a registration hunt would allow for accurate statistics about harvest and use.

In addition, aerial scouting should not be allowed during this season (or any other time while sheep hunting is allowed).

**PROPOSED BY:** Paul Forward (EG-F22-149)

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**PROPOSAL 112**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Establish a general sheep hunting season, open for take by bow and arrow only in Unit 15 Remainder as follows:

General Season

15

Unit 15, Remainder

Nonresidents

Bag limit: One ram with full-curl horn or larger every four regulatory years

Season dates: Aug. 10 – Sept. 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only every four regulatory years**

**Season dates: Sept. 21 – Oct. 5**

Hunt requires harvest ticket

General Season

15

Unit 15, Remainder

Residents only

Bag limit: One ram with full-curl horn or larger

Season dates: Aug 10 – Sept 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only every four regulatory years**

**Season dates: Sept. 21 – Oct. 5**

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would proceed the current general season which, combined with the already existing full curl requirements and limits of archery equipment, would add to the difficulty in harvest and limit impact on sheep populations. This hunt would most likely only result in the taking of a couple of rams per year if any at all.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-154)

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**PROPOSAL 113**

**5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Establish a general sheep season open for take by bow and arrow only, in Unit 7 Remainder as follows:

General Season

07

Unit 7, Remainder

Residents only

Bag limit: One ram with full-curl horn or larger

Season dates: Aug. 10 – Sept. 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only**

**Season dates: Sept 21 – Oct 5**

Hunt requires harvest ticket

General Season

07

Unit 7, Remainder

Nonresidents

Bag limit: One ram with full-curl horn or larger every four regulatory years

Season dates: Aug 10. – Sept. 20

**OR**

**One ram with full-curl horn or larger by bow and arrow only every four regulatory years**

**Season dates: Sept 21 – Oct 5**

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would proceed the current general season which, combined with the already existing full curl requirements and limits of archery equipment, would add to the difficulty in harvest and limit impact on sheep populations. This hunt would most likely only result in the taking of a couple of rams per year if any at all.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-156)  
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**PROPOSAL 114**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the RG331 goat hunt in Unit 7 to an archery only hunt as follows:

RG331 - 1 goat by **Bow and Arrow only for certified bowhunters**, by permit available online at <http://hunt.alaska.gov> or in person in Anchorage, Homer, Palmer, and Soldotna beginning Oct 27 (only selected areas open)

**What is the issue you would like the board to address and why?** RG 331 does not appear to have been opened for several years but does have a resident goat population. Much of the unit also lies within close proximity to very popular hiking and biking trails and is also close to the community of Hope. In addition there are essentially no road accessible registration goat hunting opportunities for archery hunters in the Chugach and Kenai Mountains. Changing RG331 to archery only would allow for increased hunter opportunity, decrease user conflict but avoiding the loud discharges and perceived danger or long range weapons in close proximity to popular trails and community, and would likely have very little impact on the local goat population based on harvest success rates of archery goat hunts. Finally, archery hunters are much less likely to inadvertently harvest a nanny because of the extended amounts of close range observation required to successfully take a goat with a bow.

**PROPOSED BY:** Paul Forward (EG-F22-145)  
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**PROPOSAL 115**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Divide all Unit 15C goat drawing hunts into two seasons as follows:

Modify all goat draw hunts on Kenai Peninsula units to two draw hunts with the first season August 10 to September 15 and the second season September 16 to October 15

**What is the issue you would like the board to address and why?** The draw goat hunts on the Kenai Peninsula have limited access and although there are low number of tags given out annually, hunters still end up competing with other hunters. Also, given the ability to apply for up to six hunts now has made drawing a tag more difficult in some units. Splitting the draw hunts into two hunts would provide more draw opportunities and reduce crowding at popular access locations.

**PROPOSED BY:** Dave Lyon (EG-F22-143)

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**PROPOSAL 116**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Change the regulation to clarify goat hunters in Unit 15C are restricted from taking goat on the Kenai Peninsula for five years if a nanny is harvested as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(3)

Unit 15(C), that portion beginning at the mouth of Jakalof Creek, then southwesterly along the shore of Kachemak Bay to the mouth of the Port Graham River, then southeasterly up the Port Graham River approximately 6 miles, then southerly up the south fork to the divide, then easterly across the divide to the main drainage that flows into Windy Bay, then southeasterly down the creek to Windy Bay, then easterly along the shoreline to the mouth of Rocky River, then northerly up the Rocky River and Windy River to the divide separating Windy River from

Jakalof Creek, then across that divide to Jakalof Creek, then down Jakalof Creek to the point of origin

1 goat by drawing permit only; **however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years;** the taking of nannies with kids is prohibited

Aug.10—Oct. 15 No open season.  
Nov.1—Nov. 30 No open season.

1 goat by registration permit only; **however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years;** the taking of nannies with kids is prohibited; or

Aug.10—Oct. 15 No open season.  
Nov.1—Nov. 30 No open season.

Unit 15(C), that portion beginning at the mouth of the Port Graham River, then southeasterly up the Port Graham River approximately 6 miles, then southerly up the south fork to the divide, then easterly across the divide to the main drainage that flows into Windy Bay, then southeasterly down the creek to Windy Bay, then along the southern shore of Windy Bay, then westerly along the shore of the Gulf of Alaska and around the tip of the Kenai Peninsula and easterly to the point of origin

1 goat by registration permit only; **however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years;** the taking of nannies with kids is prohibited

Aug.10—Oct. 15 Aug.10—Oct. 15  
Nov.1—Nov. 30 No open season.

**What is the issue you would like the board to address and why?** At the 2019 Board of Game meeting, the board established a new hunt, DG364, and separated the late season of RG364 and RG365 into RG374 and RG375 to aid ADF&G in the distribution of tags and tracking hunts in these management areas. When these new hunts were established, the board was asked to clarify that the five year no hunting penalty that has been listed in the handy dandy hunting regulations applies to all Kenai hunts. Unfortunately, the codified wording was not clarified. Since 2009, the general public including the communities of Seldovia, Nanwalek, and Port Graham have been under the impression that if a hunter harvested a nanny in these hunt areas, he or she was unable to hunt goats on the Kenai Peninsula for five years. The regulation wording available to the general public has read “If a nanny is taken, the hunter is prohibited from hunting any goats in Units 7 & 15 for 5 regulatory years”. The local communities understand the importance of limiting harvest to billies to preserve the integrity of the hunt and encourage their hunters to do so.

**PROPOSED BY:** Seldovia Fish and Game Advisory Committee (EG-F22-039)  
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**PROPOSAL 117**

**5 AAC 85.040. Hunting seasons and bag limits for goat.**

Implement the penalty for taking nannies in the RG364, 365 and 374 goat hunts in Unit 15C as follows:

Instate the nanny penalty for goat hunts RG 364, 365 and 374. This is housekeeping and should not be an issue.

**What is the issue you would like the board to address and why?** Recently created goat hunts (RG 364, 374 and 365) are on the Kenai end in the area where there is a penalty for taking a nanny this was inadvertently overlooked when the hunts were authorized.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-066)  
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**PROPOSAL 118**

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

Change the general season, resident bag limit for moose in Unit 15 to include bulls with fork antlers as follows:

One bull with spike-fork antlers on at least one side or 50-inch antlers, or antlers with three or more brow tines on at least one side.

**What is the issue you would like the board to address and why?** The issue I would like the board to address is to look at including fork antlered moose becoming a legal bull again in all of Unit 15, during the general hunting season.

Why: The moose population on the Kenai Peninsula west of the Kenai Mountains is increasing nicely. The increase is largely because of fires, brown bear hunting seasons which in some areas include baiting and a series of relatively easy winters. By including the fork bull as a legal animal, it would bring Unit 15 in line with the Alaska Constitution management plan of sustainable yield

basis. It would also open another opportunity for Alaska families to provide food for the dinner table. Having the fork antlers back would make Unit 15 the same as all other units with spike-fork regulations.

**PROPOSED BY:** Laine Lahndt (HQ-F22-004)  
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**PROPOSAL 119**

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

Create an archery only moose hunt in Unit 7 Remainder for both residents and nonresidents as follows:

Unit 7 Remainder

Residents and nonresidents

**One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only Aug. 22 – Aug. 29**

**OR**

One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side Sept. 1-Sept. 25.

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would precede the current general season which, combined with the already existing antler restrictions and limits of archery equipment, would add to the difficulty in harvest and limit impact on moose populations. This hunt would mirror exactly the early, bow and arrow only seasons in Units 15A Remainder and 15B Remainder.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-119)  
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**PROPOSAL 120**

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

Open an archery, fall moose hunt in Unit 15 as follows:

Open moose season, bow and arrow, August 15 to August 30 for a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side

**What is the issue you would like the board to address and why?** I would like to see a bow and arrow opening for moose from August 15 to August 30.

**PROPOSED BY:** Gary Deiman (EG-F22-153)  
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**PROPOSAL 121**

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

Establish an early archery only moose hunt in Unit 15C to align with Units 15A and 15B as follows:

Establish an early season, archery only hunt in Unit 15C to run concurrent with the existing archery hunts in Units 15A and 15B.

**What is the issue you would like the board to address and why?** Units 15A and 15B have an early archery only moose season on the Kenai Peninsula. There is no reason not to extend this to Unit 15C. This would bring the entire unit into the same regulations. This would also negate the occasional incident where hunters unknowingly shoot a moose in Unit 15C during the archery season.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-069)  
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**PROPOSAL 122**

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

Establish an early, archery only registration moose hunt in Unit 15C to align with Units 15A and 15B as follows:

This is a proposal to establish an early archery only season for moose in Unit 15C. This would be a registration hunt. The dates should reflect the dates for Unit 15A and 15B.

**What is the issue you would like the board to address and why?** Absence of an archery season in Unit 15C for moose. Justification: Units 15A and 15B already have an archery only season and this would simply complete and make consistent this season for the rest of Unit 15.

**PROPOSED BY:** Joseph Brewer (EG-F22-023)  
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**PROPOSAL 123**

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

Establish an archery only, fall moose hunt in Unit 15C as follows:

Early moose season bow and arrow only: August 10 - 29.

**What is the issue you would like the board to address and why?** Hopefully granting Unit 15C an early bow and arrow only moose season just like Units 15A and B, from 8/10 - 8/29.

**PROPOSED BY:** Dave Hahn (EG-F22-015)  
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**PROPOSAL 124**

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

Establish a general moose season open for take by bow and arrow only, in Unit 15C Remainder as follows:

Unit 15C Remainder

Residents

**One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only Aug. 22 - Aug. 29**

**OR**

One bull with a spike on at least one side or 50-inch antlers or antlers with three or more brow tines on at least one side Sept. 1 - Sept. 25

Nonresidents

**One bull with 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only Aug 22-Aug 29**

**OR**

One bull with 50-inch antlers or antlers with three or more brow tines on at least one side Sept. 1-Sept. 25.

**What is the issue you would like the board to address and why?** Adding additional hunting days to the general season and restricting them to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. This hunt would precede the current general season which, combined with the already existing antler restrictions and limits of archery equipment, would add to the difficulty in harvest and limit impact on moose populations. This hunt would mirror almost exactly the existing bow and arrow only seasons in Unit 15A Remainder and 15B Remainder.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-120)

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**PROPOSAL 125**

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

Establish a fall archery hunt for moose in Unit 15C to align with Units 15A and 15B as follows:

Add a taking one bull with spike-fork, three brow tines and 50-inch antlers between Aug. 22 – Aug. 29 in Unit 15C.

**What is the issue you would like the board to address and why?** Unit 15C currently has no archery season for moose. I request that the Board of Game add an archery season that aligns with

the seasons already in place in Units 15A and 15B. These subunits hold less moose than Unit 15C and would help spread out the harvest over the entire unit instead of the areas with higher predator populations and less moose.

**PROPOSED BY:** Caleb Martin (EG-F22-126)

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**PROPOSAL 126**

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

Establish an early archery moose hunt in Unit 15C as follows:

I would recommend changing the law so that early moose archery season in Unit 15 includes 15C. It currently excludes Unit 15C.

**What is the issue you would like the board to address and why?** I would like to see the early moose archery season, currently limited to Units 15A and 15B, expanded to include Unit 15C. I see no reason for the current exclusion, and am a hunter in Unit 15C. This proposal is solely in reference to Unit 15.

**PROPOSED BY:** David Lama (HQ-F22-035)

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**PROPOSAL 127**

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

Extend the TM549 moose hunting season in Unit 15C, Southwest of Point Pogibshi as follows:

**Sept. 1** [AUG. 25] – Sept. 30 **and Nov. 1 - Nov.15.**

**What is the issue you would like the board to address and why?** Extend the TM549 open season for moose in Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky and Windy Bays in order to increase hunter opportunity in the area. Inconsistent weather conditions have in the past limited hunting during the scheduled open season that is currently between August 25 and September 30. Area hunters have been experiencing effects of climate change and moose are migrating and rutting later than usual. A longer season would allow hunters more flexibility to schedule hunts around challenging weather conditions. ADF&G data shows that Tier II TM549 moose harvest has declined in recent years. From 2011-2017 hunter harvest averaged 2.4 moose/year. However, the most recent three-year average is 1.3 moose/year. ADF&G reported that no moose have been harvested between 2010-2021 prior to September 1st. The earliest date of harvest during this time was September 4th.

**PROPOSED BY:** Chugach Regional Resources Commission (EG-F22-049)

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**PROPOSAL 128**

**5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 15C as follows:

This proposal would reauthorize the antlerless moose hunt for the Homer bench (DM549) and the targeted hunt (AM550).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the nonresident drawing hunt: or	Oct. 20—Nov. 20	
...		
1 moose by targeted permit only[,]	Oct. 15—Mar. 31	
NONRESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the resident drawing hunt		Oct. 20—Nov. 20
Remainder of Unit 15(C)		
...		
RESIDENT HUNTERS:		
...		

1 moose by targeted permit only[,]

Oct. 15—Mar. 31

**What is the issue you would like the board to address and why?** Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorization of the Homer bench hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in Unit 15C for the 2023-24 hunting season.

In February 2017, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in a population estimate of 3,529 moose (95% CI: range 2,769–4,289), of which 19% (95% CI: 14–24) were calves. This equates to a density of approximately 3 moose/mi<sup>2</sup> in the census area. Fall composition counts in core count areas during December 2019 provided a bull ratio of 33 bulls:100 cows.

The Homer bench land in Unit 15C, which encompasses the hunt boundary of DM549, contains high densities of moose when deep snow drives moose into human populated areas. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 25 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 63 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-048)  
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**PROPOSAL 129**

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

Expand the hunt area boundaries for the antlerless moose hunt in Unit 15C as follows:

Expand the boundaries of the Homer cow moose hunt as follows... Beginning at the mouth of Deep Creek then easterly along Deep Creek to Caribou Lake to the outlet of Fox Creek, then south along Fox Creek to the mouth of Fox Creek.

**What is the issue you would like the board to address and why?** Since the inception of the Homer cow moose hunt (DM549) the land that was once open has for the most part been developed and/or posted. This has resulted in increasing conflict as hunting effort is concentrated in only a few legal areas.

Research has shown that cows in Unit 15C wander widely and that expanding the area of the hunt would not be detrimental to the overall moose population.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-064)  
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## **PROPOSAL 130**

### **5 AAC 92.118. Intensive Management Plans IV.**

Renew and update the Unit 15C Intensive Management Plan as follows:

(c) Unit 15(C) Predation Control Area. The Unit 15(C) Predation Control Area is established and consists of all lands within Unit 15(C) north of Kachemak Bay including the Fox River Flats (1,171 square miles); state and private lands are approximately 856 square miles;

(1) this is a continuing **habitat enhancement and predator** control program that was first established by the Board of Game (board) in 2012 for wolf control; it is [CURRENTLY] designed to increase moose **abundance** [NUMBERS] and harvest by **improving habitat and** reducing predation on moose by wolves and is expected to [MAKE A CONTRIBUTION TO ACHIEVING] **maintain** the intensive management (IM) objectives in Unit 15(C);

(2) moose and wolf objectives are as follows:

(A) moose IM population objectives for Unit 15(C) as established in 5 AAC 92.108 are 2,500 - 3,500 moose. This objective is within the range of historic population estimates; the bull-to-cow objective is 20 - 25:100 for Unit 15(C);

(B) the moose harvest objectives for Unit 15(C) is 200 - 350 moose; which is eight percent of the low population objective and 10 percent of the high population objective;

(C) the department has determined that wolves can be removed from public and private lands within the control area to the extent possible without affecting the sustainability of the wolf population in Unit 15(C) because the control area is approximately 33 percent of Unit 15(C) and does not include all lands that the wolf population occupies;

(3) findings concerning populations and human use are as follows:

(A) **repealed** \_\_ / \_\_ / \_\_\_\_;

(B) wolf predation is likely **a factor in the failure to achieve moose population and harvest objectives** [AN IMPORTANT CAUSE OF THE FAILURE TO ACHIEVE THESE OBJECTIVES];

(C) a reduction in wolf predation in Unit 15(C) may make progress toward achieving the Unit 15(C) IM harvest objectives for moose;

(D) reducing wolf predation **is likely to be effective and feasible using** [HAS BEEN EFFECTIVE UTILIZING] recognized and prudent active management techniques and based on scientific information;

(E) reducing wolf numbers is likely to be effective given land ownership patterns if conducted by department personnel;

(F) **repealed** \_\_ / \_\_ / \_\_\_\_;

(4) authorized methods and means are as follows:

(A) hunting and trapping of wolves by the public in the Unit 15(C) Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits as a method for wolf removal

under AS 16.05.783;

(C) department personnel will be allowed to conduct aerial wolf removal using aircraft under AS 16.05.783.

(5) time frame is as follows:

(A) through **June 30, 2029** [JULY 1, 2022], the commissioner may authorize the removal of wolves in the Unit 15(C) Predation Control Area;

(B) annually the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose and wolf populations, and recommendations for changes, if necessary to achieve the objectives of the plan.

(6) the commissioner will review, modify, or suspend program activities as follows:

(A) when the mid-point of the IM population and harvest objectives for the moose population are achieved;

(B) if, after three years, the harvest of wolves is not sufficient to make progress towards the IM population objectives for wolves;

(C) wolf predation control activities may be suspended:

(i) if, after three years, there is no detectable increase in the total harvest of moose in the control area;

(ii) if, after three years, any measure **such as twinning rates and short-yearling mass**, consistent with significant levels of nutritional stress in the moose population is identified;

(iii) when the moose population and harvest objectives within Unit 15(C) have been met; or

(iv) if the population exceeds a density of 3.0 moose per square mile;

**(7) The department may plan and execute habitat enhancement projects in areas identified for improvement based on evidence at the landscape or population level through prescribed burns, wildfire, or mechanical means to increase the potential carrying capacity across the range in the Unit 15(C) Predation Control Area.**

**What is the issue you would like the board to address and why?** The Unit 15C Intensive Management (IM) plan expires July 1, 2022. Due to rescheduling of board meetings due to the CoV-SARS 2 pandemic this proposal will be presented to the board after expiration. The department would like to have the plan reauthorized with predator control and habitat enhancement options. While the Unit 15C moose population and harvest objectives are currently being met the department sees a benefit to reauthorizing and updating the plan. Updates to the plan include adding habitat enhancement, which was not the focus in the initial IM plan development. The department's intent is to utilize habitat work to maintain moose populations within objectives, which will support meeting harvest objectives. Several habitat enhancement operations are being developed for use in Unit 15C and because of recent fire activity the department has the opportunity to research and monitor habitat changes over time.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-058)

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**PROPOSAL 131**

**5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 20	Aug. 20—Sept. 20
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the board. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective.

In response to concerns that the moose population on Kalgin Island had exceeded the island’s carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective.

During the most recent moose survey, department staff counted 30 moose on Kalgin Island in February 2022. However, this survey suffered from poor conditions for detecting moose and long term data indicates the population has been relatively stable for 10 years. This count is within the population objective of 20–40 moose. In the last 10 years, an average of 121 permits were issued for this hunt; of which 91 permittees hunted, with an annual average harvest of 30 moose.

The any moose registration hunt is recommended to provide liberal harvest opportunity on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make over-harvest unlikely.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-049)  
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**PROPOSAL 132**

**5 AAC 92.171(b). Sealing of horns and antlers.**

Remove the antler sealing requirement for moose harvested on Kalgin Island and from the TM549 Tier II subsistence area as follows:

5 AAC 92.171(b).

(b) A person may not alter, possess, transport, or export from the state, the antlers of a moose taken in any hunt in Units 7, excluding the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and 15, **excluding Kalgin Island and that portion of Unit 15C southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay**, unless the antlers have been permanently sealed by a department representative within 10 days after the taking, or a lesser time if designated by the department.

**What is the issue you would like the board to address and why?** During the 2010 Board of Game meeting the board passed a regulation requiring all antlers from moose harvested on the Kenai Peninsula be sealed by a department representative. When this regulation was established, the Tier II subsistence moose hunt (TM549) was unintentionally included, and Kalgin Island was located in Unit 16. The bag limit on Kalgin Island is one moose, and the bag limit in the Tier II hunt is one bull. The sealing requirement in Units 7 and 15 was established to address the take of sublegal bulls, and because neither of these areas has antler restrictions there is no need to seal moose harvested in those hunts.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-062)  
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**PROPOSAL 133**

**5 AAC 92.085. Unlawful methods of taking big game, exceptions.**

Prohibit the taking of black bear from boats in Unit 15C as follows:

Illegal to shoot black bear from boat in Unit 15C.

**What is the issue you would like the board to address and why?** Currently it is legal to shoot black bear from a boat in Unit 15C. This is confusing as it is prohibited in Unit 6D, Prince William sound.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-065)  
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**PROPOSAL 134**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the brown bear season in Units 7 and 15 as follows:

Change hunting regulations to read:

One bear every regulatory year by permit available online at <http://hunt.alaska.gov> or in person in Anchorage, Homer, Palmer, and Soldotna beginning Aug. 4.

RB300 August 10 - June 30

**What is the issue you would like the board to address and why?** Currently, Units 7 and 15 brown bear seasons start in September and end May 30th. Brown bears are commonly seen on sheep hunts and close to residential areas in August. Due to the season not starting yet, these conflicts must be handled by agencies rather than the public. Furthermore, brown bears are commonly seen on black bear bait sites in June and can be seen with a full hide even late in the season. It is not known exactly when a bear will or will not rub. The trophy value of a bear or if it is too rubbed should be left to the hunter to make a determination when he has the opportunity. It is common to see rubbed bears during the season early just as it is late. If the season is open to match the black bear season, hunters could have more opportunity to take these late season bears that have still full hides.

**PROPOSED BY:** Caleb Martin (EG-F22-134)  
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**PROPOSAL 135**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the brown bear season in Unit 15 from May 31 to June 30, to align with the black bear baiting season as follows:

Brown /Grizzly Bear season: Sept. 1<sup>st</sup> - June 30<sup>th</sup>.

**What is the issue you would like the board to address and why?** Brown bear season in Unit 15, for hunting opportunity and season alignment with the black bear baiting season.

**PROPOSED BY:** Wayne Ctibor and Dennis Johns (EG-F22-074 and 076)  
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**PROPOSAL 136**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the season for the brown bear registration hunts in Units 7 and 15 to June 15 as follows:

Brown bear

Units 7 and 15

1 brown bear every year by registration permit only

Resident season

Nonresident season

Sept. 1 to [MAY 31] **June 15**

Sept. 1 to [MAY 31] **June 15**

**What is the issue you would like the board to address and why?** Lost brown bear hunting opportunity during the spring season on the Kenai Peninsula, Units 7 and 15. Hunting for brown bear on the Kenai Peninsula is closely managed using an annual harvest quota of 50 to 60 bears or 8-12 females five years old or older, from all known mortality. Harvested brown bear in these Units must be reported to ADF&G within five days and presented for sealing within ten days. Since this quota management system has been in place (fall of 2013), the season has only been closed one time on the Kenai National Refuge portion of Unit 15. The hunting method of baiting

bears is allowed on the Kenai National Refuge for black bear, but it is not allowed for brown bear.

A review of brown bears seasons reveals 12 units or portions of units have spring seasons ending either June 15 or June 30. Unit 13 has an open season all year.

There will be some concern about harvesting a bear with a poor-quality hide if hunting is extended later in the spring. However, some bears have poor-quality hides in the fall and spring. Hunters can be selective and avoid harvesting a bear with a rubbed hide.

**PROPOSED BY:** Ted Spraker (EG-F22-055)  
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**PROPOSAL 137**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the brown bear registration hunt (RB300) in Unit 7 to June 15 as follows:

Extend RB300 to June 15<sup>th</sup>.

**What is the issue you would like the board to address and why?** Brown bear season ends May 31st for RB300. I am looking to extend it to June 15th. It seems the brown bears in this Unit rut later for higher elevations and I believe extending the season would assist hunters in success. This would also increase opportunity for Alaskan residents

**PROPOSED BY:** Brian Watkins (EG-F22-006)  
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**PROPOSAL 138**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the brown bear season in Unit 15 to June 15 as follows:

The new regulation would say: Sept. 1<sup>st</sup> - June 15th.

**What is the issue you would like the board to address and why?** Brown bear season dates. I believe the season closes to early, in my observations I believe the bear movement is just starting to pick up for the spring season when the current season closes.

**PROPOSED BY:** Danielle Wendt (EG-F22-050)  
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**PROPOSAL 139**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the brown bear season for the RB300 hunt in Units 7 and 15 to June 15 as follows:

All of Units 7 and 15, where hunting is legal:

One brown bear, every regulatory year by permit Sept 1- **June 15** [May 31]

**What is the issue you would like the board to address and why?** There seems to be a very

stable brown bear population in units 7 and 15 and the opportunity to pursue them after May 31 should not have a negative impact. This area is already a registration hunt so ADF&G could close it early if too many bears were being taken. A few more bears taken would surely help the moose population as well.

**PROPOSED BY:** Logan Kurtz (EG-F22-158)  
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**PROPOSAL 140**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the season for brown bear under RB300 open for take by bow and arrow only, in Units 7 and 15 as follows:

RB300

All of Unit 7 and 15, where hunting is legal.

Residents and Nonresidents

One (1) brown bear, every regulatory year by permit Sept. 1-May 31

**OR**

**All of Unit 7 and 15, where hunting is legal excluding within ½ mile of the Russian and Kenai Rivers.**

**Residents and Nonresidents**

**One (1) brown bear, every regulatory year by permit, by bow and arrow only June 1 - June 30**

**What is the issue you would like the board to address and why?** Adding additional hunting days that are restricted to archery equipment would greatly add to hunter opportunity, while also keeping the impact on the resource to a minimum. Harvest rates for bowhunters are much lower than those who use firearms, which creates a valuable opportunity for hunters to enjoy more time in the field without necessarily expecting to take an animal. Members of our organization have reported seeing a rise in brown bear activity on the Kenai Peninsula and desire an extended time in which to pursue them during the spring season. We believe that this extension can be accomplished without having a big impact on brown bear populations if it is restricted to the use of archery equipment only. This hunt is already a registration hunt and the department can easily close it by emergency order if deemed necessary. It should be remembered that this hunt currently has an unlimited number of permits to be issued. The geographic restrictions as well as the limits of archery equipment would add to the difficulty in harvest, limiting impact on brown bear populations while also providing more opportunity for hunters to pursue bears.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F22-123)  
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**PROPOSAL 141**

**5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Lengthen the bear baiting season in Unit 7 as follows:

Unit 7 Dates: April 1- June 30<sup>th</sup>

**What is the issue you would like the board to address and why?** Baiting season in Unit 7 currently runs April 15 - June 30. I am proposing the season start date be changed to April 1st. My justification is hunter safety. A season that starts two weeks earlier creates less dangerous conditions for hunters due to; avalanches, open creeks, and open lakes. I have been baiting in Unit 7 for a decade and the bear harvest should not be affected by the earlier start date. April 15th is typically close to when over flow is rampant on lakes and avalanche danger from longer, warmer days is prevalent. It would be safer for hunters to get their initial set up in two weeks earlier

**PROPOSED BY:** Brian Watkins (EG-F22-009)  
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**PROPOSAL 142**

**5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Lengthen the brown bear baiting season in Unit 15 as follows:

Start the bear baiting season April 1 instead of April 15.

**What is the issue you would like the board to address and why?** Open bear baiting start from April 1 instead of April 15.

**PROPOSED BY:** Gary Deiman (EG-F22-155)  
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**PROPOSAL 143**

**5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Restrict bear bait stations within a half mile of certain structures in Unit 15 as follows:

Change the restriction from 1 mile to 1/2 mile from structure.

You may not set up a bait station within 1/2 mile of a:

- house (including your own)
- school
- business
- ETC

**What is the issue you would like the board to address and why?** Setting up bear baits within 1 mile of a structure. Restricts access to a lot of land for bear baiting.

**PROPOSED BY:** Danielle Wendt (EG-F22-051)  
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**PROPOSAL 144**

**5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Define "developed recreation facility" and "permanent dwelling" for bear baiting in Units 15 and 7 as follows:

I would ask the Board of Game to define “developed recreational facility” as a state-maintained multiuse area that provides services for shooting, launching of watercraft, or camping. It also must include signage and buildings that are regularly maintained for the purpose of recreation.

I would ask the board to define “permanent dwelling” as a structure permanently fixed in place, legally owned by the public or a private individual, and occupied for a minimum of 30 days per year.

**What is the issue you would like the board to address and why?** Currently for bear baiting in Units 15 and 7 the regulations read:

- 5) a person may not use bait or scent lures within
  - (A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;
  - (B) one mile of a
    - (i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on the opposite side of a major river system, as identified by the department in the permit, from the bear baiting station;
    - (ii) business; or
    - (iii) school; or
  - (C) one mile of a developed campground or developed recreational facility;

**There is no definition of what a permanent dwelling or recreational facility is.** When I spoke to three different Alaska Wildlife Troopers and multiple ADF&G offices, not only was there different answers, but several officials assumed it was up to the INTERPRETATION of the wildlife officers to determine how to define these areas. I have spoken to many members of the public who have spoken about getting fined or had to prove in court what is, or is not legal when it comes to these areas. One officer may determine a bait site legal, while another may charge a hunter. The regulations currently allow an officer to determine a duck blind, tree stand or any type of structure as a permanent dwelling with no recourse when the courts determine otherwise.

**PROPOSED BY:** Caleb Martin (EG-F22-130)  
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**PROPOSAL 145**

**5 AAC 92.510. Areas closed to hunting.**

**5 AAC 92.550. Areas closed to trapping.**

Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15 as follows:

**5 AAC 92.510. Areas closed to hunting.**

Amend to include all lands within ¼ mile of the five wildlife structures (including the structures themselves) being constructed as part of the Sterling Highway MP 45-60 Project: two underpasses and one overpass in Unit 7 and two underpasses in Unit 15A.

**5 AAC 92.550. Areas closed to trapping.**

Amend to include all lands within ¼ mile of the five wildlife structures (including the structures themselves) being constructed as part of the Sterling Highway MP 45-60 Project: two underpasses and one overpass in Unit 7 and two underpasses in Unit 15A.

**What is the issue you would like the board to address and why?** The Sterling Highway mile post (MP) 45-60 Project (aka Cooper Landing Bypass) includes more than \$10.5 million in mitigation for wildlife crossings including four underpasses and the first overpass in Alaska. Two underpasses are in Unit 15A between Jim’s Landing and Sportsman’s Landing along the existing highway; two underpasses and one vegetated overpass are in Unit 7 between Sportsman’s Landing and Cooper Landing along the new bypass.

These structures are expected to help reduce moose-vehicle collisions (that average more than \$35,000 per incident in damage, injury and sometimes human death according to the Alaska Moose Federation) and allow for other wildlife species to move unimpeded across a road segment that currently averages > 1.2 million vehicles per year.

Cameras installed to monitor similar wildlife underpasses on the adjacent Sterling Highway MP 58-79 through the Kenai National Wildlife Refuge have already documented use by moose, lynx, snowshoe hare, brown and black bears, porcupine, caribou, river otter, ermine, mink, ducks and sandhill cranes. More wildlife use is expected once game trails become well established, a likely outcome because trapping and hunting around those structures are incidentally prohibited by other safety restrictions imposed by the Refuge near roads, campgrounds, trailheads, and buildings.

However, the new structures being installed on the Sterling Highway MP 45-60 project do not have protections for wildlife while they use them. Without a change in regulation, hunting and trapping would be permitted on and at the entrance/exit of multi-million dollar structures meant to create safe passage across the highway; these underpasses and this bypass, meant to benefit wildlife, could turn into a population sink.

We seek to ensure that the \$10+ million investment of public funds to help wildlife navigate an increasingly congested part of the Kenai Peninsula is honored by State hunting and trapping regulations.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-032)

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**PROPOSAL 146**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks on specific trails within the Kachemak Bay State Park in Unit 15C as follows:

**5 AAC 92.550 Areas closed to trapping.**

.....(4) Unit 15:

...

**(E) Those portions in Unit 15C that are within 100 yards from the Diamond Creek Trail, the Grewingk Glacier Lake Trail and the Grewingk Saddle Trail are closed to trapping.**

**What is the issue you would like the board to address and why?** Require a 100-yard setback of traps from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail within Kachemak Bay State Park. These trails are heavily used by the public during trapping season, accompanied by their dogs.

Other considerations, including appropriate signage warning park users of traps during trapping seasons, would help avoid conflicts but is labor intensive and requires funding which is currently not available.

Requiring [ark visitors to have their dogs on a leash during trapping season is another option. Skiing and snowshoeing with a dog on a leash is difficult and is not adhered to. Our rangers are already strapped with responsibilities and regulation enforcement is difficult at best.

Requiring trappers to get permits in the park, like Chugach State Park, would better educate users but would again require unavailable staff time, energy and additional funding.

If nothing is changed, dogs getting caught in traps will increase causing unnecessary trauma to [ark users and dogs, and huge public outcry. User conflicts are time consuming and energy draining for all involved. Already overtaxed and underfunded, ADF&G employees and Park staff will be increasingly burdened.

**PROPOSED BY:** Kachemak Bay State Park Citizen Advisory Board (EG-F22-030)

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**PROPOSAL 147**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along certain snow machine and Nordic ski trails in Unit 15C as follows:

We recommend no trapping within 100 yards from Snomad mapped trails in Unit 15C and 100 yards from Kachemak Nordic Ski Club Trails in Unit 15C.

**5 AAC 92.550**

**(4) Unit 15C**

...

**E. within 100 yards from Snomad trails in 15(C);**

**F. within 100 yards from Kachemak Nordic Ski Club Trails in 15(C).**

**What is the issue you would like the board to address and why?** With a growing population on the lower Kenai Peninsula and an increase in non-consumptive users on multi-use trails, conflict with traditional trapping areas and incidents of pet dogs being caught in traps is becoming more common in Unit 15C.

Local trappers, non-consumptive trail users, and the Homer AC working together propose that: traps set adjacent to public mapped trails in Unit 15C be at least 100 yards from the main trail.

If a 100-yard setback is not implemented, there will be more user conflicts on public trails, as the number of non-consumptive users increases on public trails in winter each year in Unit 15C.

**PROPOSED BY:** Homer Fish and Game Advisory Committee, Sid Wolford and Kathy Sarns Irwin (EG-F22-048)  
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**PROPOSAL 148**

**5 AAC 92.550. Areas closed to trapping.**

Require 100-yard trapping setbacks from known multi-use trails in Unit 7 as follows:

I propose that traplines need to be set up, say 100 yards from known multi-use trails.

**What is the issue you would like the board to address and why?** I live in Seward. Last winter on popular trails in the area, trappers were setting up traplines directly on the side of trails. I understand that this is not illegal but they are catching people’s dogs on these trails and causing quite a bit of user conflict.

**PROPOSED BY:** Jacob Swartz (EG-F22-098)  
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**PROPOSAL 149**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along the perimeter of campgrounds in Unit 7 as follows:

**1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along the perimeter of the campgrounds listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing campgrounds in the Cooper Landing area.

2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards on all sides of the campgrounds listed. Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from all sides of the campgrounds listed.”**

- Quartz Creek Campground
- Crescent Creek Campground
- Russian River Campground
- Cooper Creek Campgrounds, North & South

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state-managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along the perimeter of the campgrounds listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets’ utilizing campgrounds in the Cooper Landing area.

Unit	Campground Name	Location	Winter Uses
7	Quartz Creek Campground	Mile 1 Quartz Creek Road, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Crescent Creek Campground	Mile 3 Quartz Creek Road, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Russian River Campground	Entrance is Mile 53 Sterling Highway, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,

7	Cooper Creek Campgrounds, North & South	Mile 50.7 Sterling Highway, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
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2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area’s economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from campgrounds, trap placements close to campgrounds, present a very real danger, especially for young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near campgrounds, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers’ opportunity to trap near a campground. Proposing setbacks for campgrounds still leave most other areas unrestricted to trapping. Trappers who follow the Trapper’s Code of Ethics’ third tenant, to “promote trapping methods that will reduce the possibility of catching non-target animals,” most likely already set traps back from campgrounds. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups’ safety. These proposed setbacks would also align with the Forest Service’s Our Values Statement, which includes the intention of managing for “*Safety. In every way: physical, psychological, and social.*”

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than 1 minute. **A local Cooper Landing trapper, as well as trappers from other nearby GMUs, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game’s ability to manage wildlife along the listed campgrounds. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit

system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes all public campgrounds accessed by a variety of users groups during the trapping season. The campgrounds that we have proposed for trapping setbacks are used for: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-008)  
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## **PROPOSAL150**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along certain roads and pullouts in Unit 7 as follows:

#### 1) SOLUTION:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular roads and pullouts in the Cooper Landing area.

#### 2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7: "Trap setback of 100-yards on both sides of roads and all sides of pullouts listed. Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from the road or pullout."**

- Quartz Creek Road - Quartz Creek Road from its intersection with the Sterling Highway to the powerline crossing at approximately mile 2.5.
- Quartz Creek Road - From powerline crossing to Crescent Creek Trailhead at mile 3.5(used in winter for skiing)
- East Quartz Creek and Williams Road - Entire East Quartz Creek Road

from its intersection with Quartz Creek Road and Williams Road

- Old Sterling Highway (unmaintained portion of Quartz Creek Road) - Old Sterling Highway from the Crescent Creek Trailhead to Tern Lake Rest and Picnic area
- Snug Harbor Road - The first 2.8 miles of Snug Harbor Road from its intersection with the Sterling Highway to the entrance of the Chugach Electric Power Station
- Bean Creek Road - The entire distance from the Sterling Hwy to end.

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular roads and pullouts in the Cooper Landing area.

Unit	Road or Pullout Name:	Description	Winter Uses
7	Quartz Creek Road	Quartz Creek Road from its intersection with the Sterling Highway to the powerline crossing at approximately mile 2.5.	Walking, hiking, fat tire biking
7	Quartz Creek Road	From powerline crossing to Crescent Creek Trailhead at mile 3.5	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, and access to backcountry skiing
7	East Quartz Creek and Williams Road	Entire East Quartz Creek Road from its intersection with Quartz Creek Road and Williams Road	Walking, hiking, fat tire biking,

7	Old Sterling Highway (unmaintained portion of Quartz Creek Road)	Old Sterling Highway from the Crescent Creek Trailhead to Tern Lake Rest and Picnic area	Cross-country skiing, access to backcountry skiing, snowshoeing, hiking, skijoring, snowmachine use
7	Snug Harbor Road	The first 2.8 miles of Snug Harbor Road from its intersection with the Sterling Highway to the entrance of the Chugach Electric Power Station	Walking, hiking, fat tire biking
7	Bean Creek Road	The entire distance. This road is mostly surrounded by private property, but unless posted, traps can be set.	Walking, hiking, fat tire biking
7	Russian Gap Road	The entire distance. This road is mostly surrounded by private property, but unless posted, traps can be set.	Walking, hiking fat-tire biking
	All vehicle pullouts along the Sterling Highway	Pullouts along the Sterling Highway from its junction with the Seward Highway to the entrance to the Russian River Ferry and Boat Launch	People use these pullouts to let their animals and children take bathroom breaks, stretch their legs, take in the views and gear up for backcountry activities

2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from roads and pullouts, trap placements close

to roadways, or in pullouts, present a very real danger, especially for young children and pets. As

of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near roads and pullouts, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers' opportunity to trap near a road or pullout. Proposing setbacks for only the most popular and heavily used roads and pullouts leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used roads and pullouts. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than one minute. **A local Cooper Landing trapper, as well as trappers from other nearby Units, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game's ability to manage wildlife along the listed roads and pullouts. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100- yard setback from trails has been submitted and endorsed by the Homer Advisory Committee. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes only the most popular roads and pullouts accessed by a variety of users groups during the trapping season. The popular roadways and pullouts that we have proposed for trapping setbacks are used for: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-009)  
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## **PROPOSAL 151**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along highway pullouts, backcountry access points, and winter trails in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails described in the table provided. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of backcountry user groups to Unit 7.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards along the perimeter of highway pullouts accessing backcountry areas along the Seward Highway, and on both sides of the winter trails listed within the Summit Lake Recreational Area. However, traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from the trail or pullout.”**

- Japan Woods - The west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) north to Colorado Creek (MP 46.5).
- Tenderfoot Campground – Ski Area - MP 46 of the Seward Highway.
- Park N Poke - The west side of the Seward Highway from the southern-most tip of Lower Summit Lake (MP 47) to the gravel pit at (MP 49).
- Manitoba Mountain - MP 48 of the Seward Highway, pullout on the east side of the highway for the Alaska Mountain Huts (non-profit organization), following the established .7-mile trail to the Manitoba Cabin, and up the Polly Mine Trail (1 mile) to where it meets with the Manitoba Mountain Trail and continuing up to tree line at the summit of Little Manitoba Mountain.

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

#### **1) ISSUE:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails described in the table provided. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of backcountry user groups to Unit 7

Unit	Trail Name	Description	Winter Uses
7	Japan woods	The west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) north to Colorado Creek (MP 46.5).	Backcountry skiing, snowshoeing, bird hunting, hiking
7	Tenderfoot Campground – Ski Area	MP 46 of the Seward Highway.	Backcountry skiing, cross-country skiing, snowshoeing, bird hunting, hiking, snow machine use
7	Park N Poke	The west side of the Seward Highway from the southern-most tip of Lower Summit Lake (MP 47) to the gravel pit at (MP 49).	Backcountry Skiing, snowshoeing, bird hunting, hiking
7	Manitoba Mountain	MP 48 of the Seward Highway, pullout on the east side of the highway for the Alaska Mountain Huts (non-profit organization), following the established .7-mile trail to the Manitoba Cabin, and up the Polly Mine Trail (1 mile) to where it meets with the Manitoba Mountain Trail and continuing to tree line at the summit of Little Manitoba Mountain. <a href="https://www.alaskahuts.org/manitoba-hiking-guide/">https://www.alaskahuts.org/manitoba-hiking-guide/</a>	Backcountry and cross- country skiing, snowshoeing, bird hunting, hiking, backpacking for camping and cabin use

Note: Maps for the following proposal are available at: [https://www.cnfaic.org/wp-content/uploads/2013/10/Summit\\_Lake\\_Area.jpg](https://www.cnfaic.org/wp-content/uploads/2013/10/Summit_Lake_Area.jpg)

## 2) WHY:

Trapping setbacks would establish safe zones for user groups accessing backcountry areas for: cross-country skiing, backcountry skiing, snowboarding, snowshoeing, ice fishing, bird hunting, cabin rentals and more.

Trapping setbacks would reduce some of the dangers to safety personnel called to respond to an area requiring the use of search and rescue dogs to find injured, lost, or buried victims.

The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings.

To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates **2,500 to 3,500** trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses. It would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social*".

A survey conducted in Cooper Landing by the Cooper Landing Safe Trails Committee, in March 2021, found that 90% of respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt that setbacks were unnecessary. **A local Cooper Landing trapper, as well as trappers from other nearby GMU's, have endorsed a 100-yard setback as reasonable and logical.**

A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer Advisory Committee. Having regulations that are consistent within the region will make management, education, and enforcement easier in Units 7 and 15.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-011)  
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**PROPOSAL 152**

**5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along trails and trailheads in Unit 7 as follows:

1) SOLUTION:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the trailheads listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use trails in the Cooper Landing area.

2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7: "Trap setback of 100-yards on both sides of the trails and trailheads listed. Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50-yards from the trail."**

- Crescent Creek Trail
- Lower Russian Lake Trail
- Bean Creek Trail

- Russian Gap Trail/Historic Quartz Creek Trail
- Resurrection Trail, South End
- West Juneau Bench Trail
- Devil's Pass Ski Loops
- Stetson Trail parking area and first 400 yards

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the trailheads listed and described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use trails in the Cooper Landing area.

Unit	Trail Name	Description	Winter Uses
7	Crescent Creek Trail  USGS Map Seward B7, C7 and C8  USFS, Chugach National Forest Map for Crescent Creek Trail	Begins at Crescent Creek Trailhead parking area at mile 3.5 of Quartz Creek Road and ascends 6.5 miles to the Crescent Lake Cabin at the west end of the lake.	Backcountry skiing, snowshoeing, hiking, backpacking, fat tire biking, and access to public use cabins
7	Lower Russian Lake Trail  USGS Map Seward B8, Kenai B1  USFS, Chugach National Forest Map for Russian Lakes Trail	Lower Russian Lake Trail from the trailhead parking located in the Russian River Campground about 1.0 miles from the campground entrance to both the Barber Cabin on the shore of Lower Russian Lake and to the Russian River Falls Overlook.	Backcountry and cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, backpacking and access to public use cabins

7	Bean Creek Trail	Bean Creek Trail starting at its trailhead at mile 0.5 of the west end of Slaughter Ridge Road to its intersection of the main Resurrection Pass Trail above Juneau Falls.	Backcountry and cross-country skiing, snowshoeing, hiking, fat tire biking, snow machining, dog mushing, backpacking, and access to public use cabins
7	Russian Gap Trail/Historic Quartz Creek Trail	This trail is referred to as the Quartz Creek Trail on the 2004 plat approved by the Kenai Peninsula Borough for the Russian Gap Subdivision. This trail ascends behind the west side of KPB parcel 11912507 and continues through parcel 11912513, connecting with the Russian Gap Trail and heading north easterly along a bench below Russian Gap.	Backcountry and cross-country skiing, snowshoeing, hiking, snowmachine use
7	Resurrection Trail, South End USGS Maps Seward B8, C8 and D8	From the southern Resurrection Trail trailhead on the Sterling Highway continuing to the Swan Lake public use cabin	Backcountry and cross-country skiing, snowshoeing, hiking, fat tire biking, backpacking and access to public use cabins
7	West Juneau Bench Trail USGS Maps Seward B8, C8 and D8	From the Sterling Highway pullout at mile 53.25 just west of the southern Resurrection Trail trailhead continuing to its intersection with the Resurrection Trail.	Back country and cross-country skiing, snowshoeing, hiking, snow machining, fat tire biking, backpacking for camping and cabin use

7	Devil's Pass Ski Loops USGS Map Seward C7 and C8 USFS, Chugach National Forest Map for Devil's Pass Trail	These trails begin at the far end of the parking area for Devil's Pass Trail head at mile 39.5 of the Seward Highway. They loop along the cleared area to the northeast of the parking lot between Quartz Creek and the Seward Highway.	Backcountry ski access, cross country skiing, snowshoeing, fat-tire biking, skijoring
7	Stetson Creek Parking area and Trail	Stetson Trail parking area at milepost 50.7 of Sterling Highway. Setback of 100 yards around clearing beyond gate under the power line and first 400 yards up the trail.	Cooper Landing EMT training, search and rescue dog training, hiking and snowshoeing

2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the number of winter trail users has increased immensely over the past 20 years, so have the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from multi-use trails, trap placements close to (or in) trails and trailheads present a very real danger to all users, especially young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to use these multi-use trails, we are seeking trapping regulation that will ensure the safety of all trail users.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers' opportunity along multi-use trails. Proposing setbacks for only the most popular

and heavily used multi-use trails leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used

trails. The setbacks we are requesting will not unduly impact trappers and will greatly improve trail user safety. These proposed setbacks would also align with the Forest Service’s Our Values Statement, which includes the intention of managing for “*Safety. In every way: physical, psychological, and social.*”

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than one minute. **A local Cooper Landing trapper, as well as trappers from other nearby GMUs, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game’s ability to manage wildlife along the listed trails. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary. 86-89% responded in favor of setbacks along the trails and trailheads listed above, while 10-12% did not feel they were necessary.

Our proposal includes only the most popular multi-use trails used by a variety of users during the trapping season. Popular trail uses in our area include: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping. The Stetson Trail parking area and first 400 yards has been utilized for search and rescue dog training which is critical to the active avalanche areas close by.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates **2,500 to 3,500** trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-012)  
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## **PROPOSAL 153**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along Kenai Lake beaches in Unit 7 as follows:

#### 1) SOLUTION:

We are requesting the Board of Game amend 5 ACC 92.550 to establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake as described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use beaches in the Cooper Landing area.

#### 2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards from mean high-water mark of Kenai Lake on the north side from the Kenai River Bridge to 1 mile past the end of Williams Road and on the south side from the Kenai River Bridge to ¼ mile past the powerline crossing (powerline is at mile 2.8 Snug Harbor Road), also, Kenai Lake Beach (Locally known as Waikiki Beach) ¼ mile north to ¼ mile south of the lake access road at mile 5.8 Snug Harbor Road. Traps with an inside spread of 5 inches or less which are at least 5 feet above the ground or snow level are allowed if more than 50-yards from the beach.”**

- Kenai Lake Beaches
- Kenai Lake Beach (Waikiki Beach)

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

#### 1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake as described in the table provided. 2) We are requesting a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use beaches in the Cooper Landing area.

Unit	Beach Area	Description	Winter Uses
7	Kenai Lake Beaches	Kenai Lake Beaches: on the North side from the Kenai River Bridge to 1 mile past the end of Williams Road and on the south side from the Kenai River Bridge to ¼ mile past the powerline crossing (powerline is at mile 2.8 Snug Harbor Road). <i>Area from the mean high-water mark to 100yds back.</i>	Cross-country skiing, snowshoeing, hiking, fat tire biking, skijoring, snow machining
7	Kenai Lake Beach	Kenai Lake Beach (Locally known as Waikiki Beach) ¼ mile north to ¼ mile south of the lake access road at mile 5.8 Snug Harbor Road. <i>Area from the mean high-water mark to 100yds back.</i>	Cross-country skiing, snowshoeing, hiking, fat tire biking, skijoring, snow machining

2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area’s economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from popular beaches, trap placements close to (or on) multi-use beaches present a very real danger to all users, especially young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near beaches, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100- and 50-yard trapping setbacks are not large enough to significantly limit a trappers’ opportunity to trap near beaches. Proposing setbacks for only the most popular and heavily used beaches leaves all other areas unrestricted. Trappers who follow the Trapper’s Code of Ethics’ third tenant, to “promote trapping methods that will reduce the possibility of catching non-target animals,” most likely already set traps back from heavily used beaches. The setbacks

we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- and 50-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than 1 minute. **A local Cooper Landing trapper, as well as trappers from other nearby Units, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard and 50-yard setback distances will not impact the Board of Game's ability to manage wildlife along the listed beaches. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes only the most popular beaches used by a variety of user groups during the trapping season. Popular beach uses in our area include: cross-country skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-007)  
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**PROPOSAL 154**

**5 AAC 92.550. Areas closed to trapping.**

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

Require signs be posted at all active trapping access points in Unit 7 as follows:

**1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish mandatory signs posted at all access points of active trapping in the area. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Unit 7.

## 2) REGULATORY LANGUAGE:

**ADD Regulatory Language for Unit 7:** “Active Trapping signs posted at all access points to operating traplines. Signs must be: 1) at least 8” x 11”, 2) brightly colored (orange or yellow), 3) waterproof/tear proof, and 4) posted at eye level clearly denoting active trapping in the area. Must include ADF&G license number or Fish & Wildlife ID number; contact information optional.”

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

1) **ISSUE:** We are requesting the board amend 5 AAC 92.550 to establish mandatory signs posted at all access points of active trapping in the area. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Unit 7.

Posted trapping signs would alert user groups to trapping in the area and give them the opportunity to take safety precautions. Trapping signs would also alert safety personnel to added dangers if called to respond to an emergency requiring the use of Search and Rescue Dogs to find injured, lost, or buried victims. **A local Cooper Landing trapper already posts signs in a plastic bag warning of his traplines, and he supports a regulation to add “active trapping” signs indicating the presence of traplines as do several of the Cooper Landing AC members.**

Mandatory posted signs are in line with the Alaska Trappers Association Official Position Statement “Trapline Signs” that was adopted on September 27<sup>th</sup>, 2016, and states:

*“The Alaska Trappers Association encourages trappers in road-accessible regions of the State to post signs near major points of access to their personal trapline trails. These signs should explain that there are traps and/or snares on or near the trail. The signs could also include the trappers name and contact information. These signs are intended to alert other trail users of the purpose of the trail, so that they can avoid conflict with the trapper. This approach of posting signs should be beneficial for everyone involved.”*

Trapping signs would also be in alignment with the Forest Service’s Our Values Statement, which includes the intention of managing for “*Safety. In every way: physical, psychological, and social.*”

This is a low cost, low maintenance way to reduce conflicts between trappers and recreational users, and allows trapping to continue.

2) **WHY:** The community of Cooper Landing is located on the Sterling Highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper Landing’s primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, back country skiing, snowshoeing, ice fishing, trail running, and back country cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area for visitors to enjoy with their family and pets.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state.

By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and better align with current area resident's recreational use.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee (HQ-F22-010)

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**PROPOSAL 155**

**5 AAC 92.550 Areas closed to trapping.**

Close Unit 15C to beaver trapping as follows:

5 AAC 92.550 Southcentral Trapping Regulations

The following areas are closed to trapping as indicated: .....Unit 15 - Kenai Peninsula Area

- Skilak Loop Wildlife Management Area, consisting of that portion of Unit 15A bounded by a line beginning at the easternmost junction of the Sterling Highway and the Skilak Loop Road (milepost 58.0), then due south to the south bank of the Kenai River, then southerly along the south bank of the Kenai River to its confluence with Skilak Lake, then westerly along the north shore of Skilak Lake to Lower Skilak Lake Campground, then northerly along the Lower Skilak Lake Campground Road and the Skilak Loop Road to its westernmost junction with the Sterling Highway, then easterly along the Sterling Highway to the point of beginning;
- Kenai Moose Research Center Closed Area in Unit 15A, which consists of the area within the outer boundary fences of the Kenai Moose Research Center, located west and south of Coyote and Vixen Lakes.

**\*Unit 15C closed.**

**What is the issue you would like the board to address and why?** Close beaver trapping in Unit 15C.

There are very few beaver around these days on the Kenai Peninsula. Please give beavers some time to replenish themselves down here...just a few years, get the population back up. Give trappers some beaver to catch.

This is an issue bigger then beaver trapping. Beavers are engineers in rewetting and recharging ground water, essential for our diminishing salmon. They also have a huge ability to restore drying peatlands, vital for carbon sequestration and climate change mitigation. We need them.

**PROPOSED BY:** Sue Christiansen (EG-F22-132)

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**PROPOSAL 156**

**5 AAC 84.270. Furbearer trapping.**

Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years as follows:

Close all beaver trapping in the Anchor River and Deep Creek drainages in Unit 15C for two board cycles with a required sunset review.

**What is the issue you would like the board to address and why?** In recent years beavers have been nearly completely extra paid from the Anchor River and Deep Creek drainages. Given historic numbers and an abundance of suitable habitat it seems likely that with protection they may recall and ice these drainages and again offer trapping opportunities.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-067)

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**PROPOSAL 157**

**5 AAC 84.270. Furbearer trapping.**

Shorten the beaver trapping season in Unit 7 as follows:

Beaver trapping season: Unit 7 – **Nov. 1** [Oct. 15] - April 30

**What is the issue you would like the board to address and why?** Since 2015, beaver are at least locally depleted in Unit 7. For example, along the Seward and Sterling Highways where beaver were once fairly common now they appear to be virtually absent.

Traditional Unit 7 beaver season was November 10 - March 31, generally necessitating under ice trapping which is less efficient than open water trapping. Beaver populations seemed to be fairly stable. At some point the season was extended to April 30 allowing weeks of open water opportunity. Beginning 2015, the season was again extended, this time to open October 15. Beaver abundance seemed to hold up pretty well after the season was extended to April 30 but soon became obviously depleted after the change to October 15 open.

There is also a federal subsistence hunting season for beaver in Unit 7:

BEAVER • All rural residents, 1 beaver per day, May 1 - October 10.

Beaver pelt quality improves November 1 versus October 15.

Shortening the beaver season in Unit 7 to open November 1 will continue to provide abundant harvest opportunity while giving the population a better chance to recover.

Shortening the beaver season in Unit 15 was considered. However much of Unit 15 is within the Kenai National Wildlife Refuge which already has additional beaver trapping restrictions in place. Further we are not familiar enough with Unit 15 beaver populations to ask for a shorter season.

Reducing the bag limit was also considered but presumably few trappers seal 20 beavers from Unit 7 so that probably is not a contributing factor to observed declines.

**PROPOSED BY:** Cooper Landing Fish and Game Advisory Committee (EG-F22-079)  
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**PROPOSAL 158**

**5 AAC 84.270. Furbearer trapping.**

Shorten the coyote trapping season in Units 7 and 15 as follows:

Coyote trapping season Units 7 and 15: **Nov 10** [Oct 15]- March 31

**What is the issue you would like the board to address and why?** Coyote trapping season in Units 7 and 15 opens October 15 with 3/32" or greater diameter snare cable. Most other trapping seasons in Units 7 and 15 open November 10.

Confusing regulations, bycatch and conflict with other users are all problems. Bears are more active and more likely to encounter snares prior to November 10. 3/32" snares cannot exclude wolverine and lynx. At least one dog has been trapped during the early coyote season because the owner thought the trapping season opened November 10 and so allowed the dog to run off leash. Additionally, the dog was caught in a trap, not a snare, suggesting that whoever set the trap was possibly unaware of the snare-only requirement. Finally, according to the dog owner, ADF&G stated the trapping season for coyotes was open, again apparently unaware of the snare-only requirement. While ignorance is said to not be an excuse, clearly the early coyote season has been problematic. Aligning the coyote trapping season with most other trapping seasons will help address these issues.

**PROPOSED BY:** Cooper Landing Fish and Game Advisory Committee (EG-F22-080)  
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**PROPOSAL 159**

**5 AAC 85.057. Hunting seasons and bag limits for wolverine.**

Lengthen the wolverine hunting season in Units 7 and 15 as follows:

Adjust the wolverine season to start August 10 in Units 7 and 15.

**What is the issue you would like the board to address and why?** Currently the regulations for wolverine in Units 7 and 15 starts the season on September 1st. Wolverines are primarily found in the high country feeding on Dall sheep and mountain goats. By having a later season than Dall sheep and wolves, this means many hunters miss an opportunity to help manage these predators. If wolverines are harvested for their fur just like wolves and bears, why can a hunter harvest wolves and bears in August during sheep season, but not wolverine. The Dall sheep in the Kenai Mountains are on a steady decline while predators continue to grow.

**PROPOSED BY:** Caleb Martin (EG-F22-133)  
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**PROPOSAL 160**

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

Limit beaver trapping to one set per lodge for Units 7 and 15, and require visual markers as follows:

Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice. This regulation has been successful in the Kenai National Wildlife Refuge.

**What is the issue you would like the board to address and why?** Trapping appears to be a major factor in the extirpation of beavers in many areas of the Kenai Peninsula. Multiple trappers in one area can contribute to overharvest of beaver lodges.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-068)

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**PROPOSAL 161**

Direct ADF&G to conduct a feasibility study for transporting Sitka Blacktail deer to Unit 15C, south side of Kachemak Bay as follows:

Direct the Department of Fish and Game to conduct its scoping report, feasibility assessment, and biological and social risk analyses, which would precede department and public review before a potential formal ADF&G plan regarding transplanting and growing a population of Sitka Blacktail deer to the south side of Kachemak Bay in Unit 15C. Reference "Game Transplants in Alaska, Technical Bulletin #4 second edition by Thomas Paul, ADFG, 2009" or a later edition.

**What is the issue you would like the board to address and why?** Increase opportunity for hunting, food security, local economy, and wildlife viewing in Unit 15c.

The south side of Kachemak Bay would be a productive area to explore the idea of transplanting deer. The area is ecologically quite different than the Homer side and provides very similar habitat, browse, and other fauna to Prince William Sound, northern Southeast Alaska, and much of the Kodiak archipelago; all locations of successful past ADF&G transplant operations which now provide opportunity for all.

It is understood that this is the purview of the ADF&G Commissioner; we do not believe the Board of Game (board) has the authority to enact transplants. By submitting this as a board proposal, we are aiming only to begin a dialogue, allowing everyone who follows wildlife issues: public, private, agency staff, and administrators, to begin thinking about its viability if and when it pleases this or a future Administration.

**PROPOSED BY:** The Homer Fish and Game Advisory Committee (EG-F22-029)

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**PROPOSAL 162**

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

Extend the ptarmigan season in a portion of Unit 15C to March 31 as follows:

I propose leaving the bag limit at five and ten in possession with the hunt dates increased back to original that were August 10th - March 31st. The spring hatch has been good, and the numbers are high.

**What is the issue you would like the board to address and why?** Change back to original dates August 10th - March 31st for ptarmigan in Unit 15C, that portion north of Kachemak Bay and north of Fox River, leaving the bag limit of five and ten in possession as it is now.

**PROPOSED BY:** Rollin Braden (EG-F22-027)

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**PROPOSAL 163**

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

Rescind the bag limit restrictions for sea duck hunting in Unit 15C as follows:

In effect, eliminate special sea duck restrictions for Unit 15C, restoring seasons and bag limits applicable to the entire Gulf Coast Zone – Units 5-7, 9, 10 (Unimak Is. only) and Units 14-16.

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

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
Migratory game birds (except by falconry) <sup>1</sup>		
...		
(B) Sea Ducks (except Spectacled and Steller's eiders) <sup>3</sup>		
...		
Units 5 - 7, 9, 10 (Unimak Is. only), and Units 14 - 16		
RESIDENT HUNTERS: 10 per day, 20 in possession, of which no more than 6 each per day, 12 in	Sept. 1-Dec. 16 (General hunt only)	

possession may be harlequin ducks and no more than 6 per day, 12 in possession may be long-tailed ducks.

NONRESIDENT HUNTERS:

8 per day, 20 in possession; however, no more than 4 each of any sea duck species may be taken per season; and no more than 20 sea ducks of all species may be taken per season

Sept. 1-Dec. 16

[UNIT 15C, THAT PORTION IN KACHEMAK BAY EAST OF A LINE FROM POINT POGIBSHI TO ANCHOR POINT

RESIDENT HUNTERS:

SEPT. 1-DEC. 16]

10 PER DAY, 20 IN (GENERAL HUNT ONLY) POSSESSION, OF WHICH NO MORE THAN 2 PER DAY, 4 IN POSSESSION MAY BE LONG-TAILED DUCKS AND NO MORE THAN 1 PER DAY, 2 IN POSSESSION MAY BE AN EIDER]

[NONRESIDENT HUNTERS:

8 PER DAY, 20 IN POSSESSION; OF WHICH NO MORE THAN 2 PER DAY, 4 IN POSSESSION MAY BE HARLEQUIN DUCKS, NO MORE THAN 2 PER DAY, 4 IN POSSESSION MAY BE LONG-TAILED DUCKS, AND NO MORE THAN 1 PER DAY, 2 IN POSSESSION MAY BE AN EIDER; HOWEVER, NO MORE THAN 4 EACH OF ANY SEA DUCK SPECIES MAY BE TAKEN PER SEASON; AND NO MORE THAN 20 SEA DUCKS OF ALL SPECIES MAY BE TAKEN PER SEASON]

Sept. 1-Dec. 16

...

**What is the issue you would like the board to address and why?** Rescind bag limit restrictions for sea duck hunting in Unit 15C adopted by the Board of Game in 2010. The reductions in bag limits for eiders, harlequin ducks and long-tailed ducks were not based on best available scientific data nor were they consistent with management guidelines by ADF&G, Pacific Flyway Council or U.S. Fish and Wildlife Service to address necessary conservation needs.

There is no documented biological problem indicating low population levels or substantial declines for eiders, harlequin ducks or long-tailed ducks (nor for buffleheads or goldeneyes that are the subject of current discussions by local supporters of restrictions). There is no evidence that changes in sea duck abundance are caused by harvest.

There are no documented indications that sea duck harvests in Alaska are excessive in relation to duck population levels or increasing to the point of concern. Harvest assessment needs to be examined from a flyway-wide or large region perspective that is consistent with defined species populations that can be feasibly monitored—not from anecdotal or biased claims about small-scale effects.

It is critical that sea duck regulation decisions be framed at the appropriate scale and continue the biologically sound regime of population and harvest assessments for populations that seasonally migrate thousands of miles across thousands of square miles of breeding and wintering habitat. The numbers of birds that occupy individual bays and coves at any given time is highly variable in response to many conditions and is not relevant to the status of entire species populations at regional or flyway levels.

**PROPOSED BY:** Alaska Waterfowl Association (EG-F22-101)  
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**PROPOSAL 164**

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

Reduce the bag limit for goldeneye in Units 7 and 15 as follows:

Bag limit for Goldeneye: 4/day, 8 in possession.

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends, we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-058)  
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**PROPOSAL 165**

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

Reduce the bag limit for goldeneye in Unit 15C as follows:

4 Goldeneye per day, 8 in possession.

**What is the issue you would like the board to address and why?** A bag limit reduction on goldeneye is needed to ensure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted the same proposal. I am submitting this to add supporting information.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest place to access sea ducks in Alaska. Since goldeneye prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of Sea Ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

For the most part sea ducks are targeted for trophies—this proposal is designed to allow for trophies, meat harvest, incidental take, and traditional tribal harvest.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s, and according to ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”

Bag limits for migratory waterfowl are set on the level of the Pacific Flyway, but Alaska can set more restrictive limits, as happened when the Board of Game set special bag limit restrictions on eiders, harlequin, and long-tailed ducks in Kachemak Bay in 1999.

**PROPOSED BY:** Penelope Haas (EG-F22-093)

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**PROPOSAL 166**

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

Reduce the bag limit for bufflehead in Units 7 and 15 as follows:

Bufflehead: 4/day, 8 in possession.

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-060)

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**PROPOSAL 167**

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

Reduce the bag limit for bufflehead in Unit 15C as follows:

4 Bufflehead per day, 8 in possession.

**What is the issue you would like the board to address and why?** A bag limit reduction on bufflehead is needed to ensure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted the same proposal. I am submitting this to add supporting information.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest place to access sea ducks in Alaska. Since bufflehead prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of sea ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

For the most part sea ducks are targeted for trophies—this proposal is designed to allow for trophies, meat harvest, incidental take, and traditional tribal harvest.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s’, and according to

ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”

Bag limits for migratory waterfowl are set on the level of the Pacific Flyway, but Alaska can set more restrictive limits, as happened when the Board of Game set special bag limit restrictions on eiders, harlequin, and Long-tailed ducks in Kachemak Bay in 1999.

**PROPOSED BY:** Penelope Haas (EG-F22-095)

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**PROPOSAL 168**

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

Reduce the bag limit for harlequin duck for Units 7 and 15 as follows:

Harlequin duck: 1/day, 2 in possession

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15 it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-061)

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**PROPOSAL 169**

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

Reduce the bag limit for harlequin in Unit 15C as follows:

1 Harlequin per day, 2 in possession.

**What is the issue you would like the board to address and why?** A bag limit reduction on harlequin is needed to ensure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted the same proposal. I am submitting this to add supporting information.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest place to access sea ducks in Alaska. Since harlequin prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree

of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of sea ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

For the most part sea ducks are targeted for trophies—this proposal is designed to allow for trophies, meat harvest, incidental take, and traditional tribal harvest.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s, and according to ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”

Bag limits for migratory waterfowl are set on the level of the Pacific Flyway, but Alaska can set more restrictive limits, as happened when the Board of Game set special bag limit restrictions on eiders, harlequin, and Long-tailed ducks in Kachemak Bay in 1999.

**PROPOSED BY:** Penelope Haas (EG-F22-094)  
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**PROPOSAL 170**

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

Reduce the bag limit for long-tailed duck in Units 7 and 15 as follows:

Long-tailed duck: 1/day, 2 in possession.

**What is the issue you would like the board to address and why?** Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three-year delay in addressing management issues in Units 7 and 15 it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of population trends we suggest that a bag limits on some sea ducks be reduced.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-062)  
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**PROPOSAL 171**

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6, 7 and 15 as follows:

Direct the Department of Fish and Game to institute means and methods to record sea duck harvest as accurately as possible.

**What is the issue you would like the board to address and why?** Given that there is nearly no current data on sea duck harvest and that there is growing concern about population trends hunter harvest data should be collected.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (EG-F22-057)  
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**PROPOSAL 172**

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Require mandatory harvest reporting for sea ducks in Kachemack Bay in Unit 15C as follows:

I propose mandatory harvest reporting for sea ducks in Kachemak Bay.

Regulatory language could be modeled on regulations in the State of Washington, which reads:

“To improve management of certain limited migratory bird species, you are required to possess a Migratory Bird Authorization and Harvest Record Card(s) if you are hunting those species (see page 10). Immediately after taking a band-tailed pigeon, brant, sea duck (scoters, long-tailed duck, harlequin, goldeneyes) in western Washington, snow goose (Goose Management Area 1) or any goose in Goose Management Area 2 — Coast & Inland into possession, you must fill out the required harvest record card information in ink. You must report hunting activity on your harvest record cards to WDFW using the online reporting system at: [fishhunt.dfw.wa.gov/](http://fishhunt.dfw.wa.gov/), or by mailing the cards to: WDFW, Wildlife Program — Waterfowl Section, PO Box 43141 Olympia, WA 98504. Reports need to be postmarked by the reporting deadlines even if you did not harvest any birds. Please note that you must comply with these reporting requirements or you will be required to pay a \$10 administrative fee before obtaining a harvest record card the next year.”

**What is the issue you would like the board to address and why?** Accurate sea duck harvest numbers in Kachemak Bay are needed to assure hunt opportunities now and in the future. The Homer Fish and Game Advisory Committee voted unanimously to sponsor this proposal at its April 2022 meeting, and they have submitted a similar proposal. I am submitting this to add supporting information.

The current reporting system, Alaska’s Migratory Bird Harvest Information Program (HIP), does not give us enough information and puts us in danger of over-harvest. HIP invites voluntary reporting from a very small, randomized group of hunters from across the state: it gives a just a little information on a statewide level and does not consider regional variations.

Residents and hunters are noticing increased sea duck hunting pressure in Kachemak Bay. In 2021, we saw a disturbing spike in harvest, and we learned that the addition of a few more guides means significantly increased harvest.

Kachemak Bay is one of the easiest places to access sea ducks in Alaska. Since bufflehead prefer protected bays and coves that are particularly easy to access, they are among the most threatened species of sea ducks.

Depressed populations of sea ducks do not recover quickly. They are known to have a high degree of site fidelity, which means that if an area’s population is depressed, birds from other areas are unlikely to boost the population. Also, according to the Sea Duck Joint Venture, they have lower

reproductive and chick survival rates than other ducks.

The proposal is supported by two consecutive years of community sea duck surveys in Kachemak Bay—a local effort of over 30 people motivated by concern of over-harvest and lack of data. Our data suggests that the number of sea ducks in Kachemak Bay are limited and that populations do not bounce back after significant harvest occurs.

Populations of sea ducks in Kachemak Bay declined significantly in the 1990s, and according to ADF&G surveys and community science surveys, they have not yet recovered.

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of indigenous fish and wildlife populations.”

**PROPOSED BY:** Penelope Haas

(EG-F22-096)

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# **Antlerless Moose & Brown Bear Tag Fee Reauthorizations for Other Regions**

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## **PROPOSAL 173**

### **5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only in Unit 13(A); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or	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. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios 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 of Game adopted an October and March season during the February 2013 board meeting.

Since the establishment of this hunt, the department has issued 10 permits annually 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 enough 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. Twenty permits were issued for regulatory year (RY) 2020 and 25 permits were issued for RY21.

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, within the higher end of the objectives in 2017–2020. In

2021 the 13A moose population was estimated to be above the objectives, and the 3-year average remains just within the higher end of the objectives. The antlerless hunt in western Unit 13A contributes to maintaining the moose population within the intensive management objectives. The additional harvest provided through this hunt will also assist in achieving the harvest objectives for the population.

If antlerless moose hunting opportunities are not reauthorized in Unit 13A, 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-F22-053)  
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**PROPOSAL 174**

**5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13C as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only in Unit 13(C); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or	Oct. 1–Oct. 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. This hunt was established during the January 2022 board meeting and as a result has not yet been held. The earliest the hunt can occur is in October of 2023, and the number of permits to be issued has not yet been determined. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

Unit 13 has an active intensive management program, designed to increase moose abundance to

within objectives, and increase available harvest for humans. The program has included a predation control component that began in 2004. Since the early 2000s, moose abundance in most subunits has increased until recent years when many subunits have peaked and/or stabilized at, above, or within abundance objectives.

As moose populations approach carrying capacity, the population becomes less productive, and may eventually decline. Stabilizing a population below carrying capacity allows it to remain highly productive if additional moose are removed annually. This requires harvest of both cows and bulls. The intensive management abundance objectives for moose in Unit 13 are designed to maintain moose populations in Unit 13 subunits below carrying capacity, at a more productive level. Unit 13C has reached abundance levels for which cow harvest is necessary to stabilize the population at a more productive level and allow for human harvest of excess moose. In recent years the bull-to-cow ratio in Unit 13C averages just below the objective of 25 bulls per 100 cows, suggesting that there are not additional bulls available for harvest currently. Harvest of up to 1% of the estimated cow moose population in 13C would allow for roughly 23 cow moose to be harvested annually in recent years.

Harvest objectives for 13C are 155–350 moose, but those objectives have not been met since 1995, when 154 moose were harvested, and 1996, when 169 moose were harvested. The only other years when harvest exceeded 150 moose was in 1989 (154 harvested), and 1988 (199 harvested), which was the most moose ever reported harvested in a single year in 13C. As moose abundance in 13C increased above objectives in recent years, harvest peaked at 117 moose in 2014. Evidence suggests that the current moose harvest objectives for 13C may not be attainable due primarily to accessibility. Harvest of excess cow moose to stabilize the 13C population will increase overall harvest and provide additional opportunity for hunters to harvest cows as well as additional bulls.

If antlerless moose hunting opportunities are not reauthorized in Unit 13C, 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-F22-052)  
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**PROPOSAL 175**

**5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year,		

only as follows:

...

1 antlerless moose by drawing permit only in Unit 13(E); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or

Oct. 1–Oct. 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. This hunt was established during the January 2022 board meeting and as a result has not yet been held. The earliest the hunt can occur is in October of 2023, and the number of permits to be issued has not yet been determined. The current regulation allows hunters to take a limited number of cows in specific areas to keep the population and composition ratios within objectives.

Unit 13 has an active intensive management program, designed to increase moose abundance to within objectives, and increase available harvest for humans. The program has included a predator control component that began in 2004. Since the early 2000s, moose abundance in most subunits has increased until recent years when many subunits have peaked and/or stabilized at, above, or within abundance objectives. As moose populations approach carrying capacity, the population becomes less productive, and may eventually decline. Stabilizing a population below carrying capacity allows it to remain highly productive if additional moose are removed annually. This requires harvest of both cows and bulls. The intensive management abundance objectives for moose in Unit 13 are designed to maintain moose populations in Unit 13 subunits below carrying capacity, at a more productive level. Unit 13E has reached abundance levels for which cow harvest is necessary to stabilize the population at a more productive level and allow for human harvest of excess moose.

The moose abundance index indicated fewer than 4,000 moose in Unit 13E in 2000 but the population has been increasing since then and the current abundance is well above the abundance objectives of 5,000 to 6,000 moose. Harvest levels increased with the increase in abundance, but harvest levels remain below the harvest objectives of 300 to 600 moose. Bull-to-cow ratios are at the objective of 25 bulls to 100 cows. Additional harvest has been requested by the public for Unit 13E but cannot be obtained without harvesting some cows. Cow moose harvest opportunity will provide for the reduction of moose abundance to within objectives before the population becomes nutritionally stressed and experiences a decline due to nutritional constraints. Furthermore, harvest of cows will allow for additional bull harvest without compromising bull-to-cow ratios, and populations under sustained-yield management are more productive with both bull and cow harvest.

If antlerless moose hunting opportunities are not reauthorized in Unit 13E, 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.

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**PROPOSAL 176**

**5 AAC 84.045(a)(12). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose draw permits in Units 14A and 14B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
Unit 14(A)		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 2,000 antlerless moose permits may be issued; or	Aug. 20–Sept. 25 (General hunt only) Nov. 1–Dec. 25 (General hunt only)	No open season
1 moose by targeted permit only; by crossbow, shotgun or bow and arrow only; up to 200 permits may be issued	Winter season to be announced (General hunt only)	No open season
Unit 14(B)		
1 moose per regulatory year, only as follows:		
...		
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued.	Winter season to be announced (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. There are two types of antlerless moose hunts in the Matanuska-Susitna Valley – a drawing permit hunt used to regulate growth of the moose

population in Unit 14A, and targeted hunts used to mitigate public safety concerns in Units 14A and 14B.

Moose surveys conducted in November 2020 yielded an estimate of 7,112 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2019 survey estimate of 7,900 moose indicating that the increased antlerless harvests are having the desired effect of reducing the population. A sex and age composition of the 2020 survey demonstrated a bull ratio of 30 bulls:100 cows and a calf ratio of 36 calves:100 cows.

Antlerless moose hunts have been authorized in Unit 14A since 2001 in order to regulate the growth of the population. The permit level was increased from 450 to 1,000 in 2013 to account for the continued increase in the population and again in spring 2018 from 1,000 to 2,000. Continued increased harvest based on the increased permit levels is expected to bring the population back to within the objective for the unit of 6,000–6,500.

The current increases in the harvest have seemingly slowed the population growth; however, it has not reduced the moose population to within objectives. An increase the number of moose-human conflicts is anticipated as the moose density increases, and moose may experience nutritional stress as the population nears carrying capacity. Cow harvests are warranted to control the moose population’s growth and recommended to provide additional moose hunting opportunity in the Matanuska-Susitna Valley.

The targeted moose hunts in Units 14A and 14B are an effective tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 338 moose per year were killed in the Matanuska-Susitna Valley area during the last five years of average snowfall and substantially more are killed during higher snowfall years. ADF&G also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-047)  
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**PROPOSAL 177**

**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>
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(15)

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 only; or Jan. 1 – Last day of Feb. (Subsistence hunt only)

1 antlerless moose by registration permit only; Jan. 1 – Last day of Feb. (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. 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 many 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, there is a population estimate of 1,990 +437 moose. The bag limit of two moose and antlerless harvest opportunity provide a mechanism to limit population growth and allow 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-F22-050)  
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**PROPOSAL 178**

**5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.**

Reauthorize the resident antlerless moose season in Unit 18 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(16)

...

Unit 18, that portion that drains into Kuskokwim Bay south of the Carter Bay drainage

RESIDENT HUNTERS:

...

1 moose by registration Permit only; to be announced by emergency order	Dec. 1—Mar. 31 (Season to be announced)	No open season.
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Remainder of Unit 18

RESIDENT HUNTERS:

2 moose; of which only 1 may be an antlered bull; a person may not take a calf or a cow accompanied by a calf; or	Aug. 1—Sept. 30
2 antlerless moose; or	Oct. 1—Nov. 30.
2 moose	Dec. 1—April 30.

NONRESIDENT HUNTERS:

...

1 antlerless moose	Dec. 1—Mar. 15
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...

**What is the issue you would like the board to address and why?** To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually. The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014 Board of Game meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area, and the nonresident antlerless hunt, were both adopted at the January 2017 Board of Game meeting in Bethel. The board has previously reauthorized the antlerless moose season for resident hunts in Unit 18 Remainder for regulatory year (RY) 2016 through RY2021. This proposal requests reauthorization of all antlerless hunts for RY2023.

Implementation of antlerless hunts began in 2006 and has continued each year due to increased moose abundance and continued high reproductive rates along the Yukon River drainage in Unit 18. Based on the steady growth in moose abundance, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated at a minimum of 23,000 animals with calf:cow ratios ranging from 36:100 to 61:100, and twinning rates from 18% to 36% for all areas. Population growth continues in this portion of Unit 18 and anecdotal evidence suggests that calf survival rates were high for the winter of 2021-2022. The population is expected to continue to grow with high recruitment and adult survival.

Although the current year harvest data in the Remainder of Unit 18 has not been finalized due to the early proposal deadline, harvest is expected to be similar to the past four years and well within sustained yield for this robust population. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18.

The moose population in the Goodnews River drainage had grown steadily in the past 15 years following a closure in 2004. The fall hunt has had a quota of 10 moose in the first few years of the hunt and recently increased to 30. The season has not been closed by emergency order and the past few years the quota was not met. In the two years that the winter hunt has been held, harvest has been low (only five moose harvested in RY2017 and none in RY2018). The population now is over 400 moose and based on the steady growth in moose abundance, ADF&G proposes continued antlerless moose hunts in the Goodnews River Drainage.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-039)  
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**PROPOSAL 179**

**5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during February in a portion of Unit 19D as follows.

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

...

Unit 19(D), that portion upstream of the Selatna River, excluding the Black River

1 moose, by registration permit only, a person may not take a cow accompanied by a calf

Feb 1 – Last day of Feb.

No open season.

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The moose population in Unit 19D East has approximately doubled since predator removals began in 2003. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. By 2020 ratios had declined again and the two-year average was 17 bulls per 100 cows.

To maintain a healthy and productive moose population, department research (Boertje et al. 2007) indicates that when the 2-year average twinning rate is 11–20% populations should be stabilized. Twinning rates in Unit 19D East remained high until 2015 (30-40%); however, the current 2-year average twinning rate is now 19%, indicating a lower nutritional status in this population. The current Intensive Management plan for Unit 19D East calls for stabilization of the population through harvest when the 2-year average twinning rate is between 15 and 20%.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-046)

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**PROPOSAL 180**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
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(18)

Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Oct. 1–Feb. 28

...

1 moose by targeted permit only; by crossbow shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts are important for maintaining the moose population at levels that the habitat can support. Antlerless hunts 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.

If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Subsistence hunters in the portion of Unit 20A outside the Fairbanks nonsubsistence area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

Reauthorizing antlerless moose hunts will allow hunting opportunity and harvest to increase and allow the Department of Fish and Game to manage the moose populations at an optimum level. The additional harvest will help in meeting IM harvest objectives without reducing bull-to-cow ratios. Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at a level compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The current objective is to maintain moose numbers within the IM population objective of 10,000–15,000 moose, while monitoring indicators of moose and habitat condition for positive density-dependent responses. The Unit 20A population was estimated at between 12,100–15,900 moose (90% confidence interval) in November 2021. There is an estimated 5,040 mi<sup>2</sup> of moose habitat in Unit 20A which equates to a moose density of between 2.4 and 3.2 moose/mi<sup>2</sup>. The median of this estimate falls within the IM population objective but at the upper end. The department does not want the population to further increase because of concerns about density effects such as twinning rates below 20% and short-yearling weights below 400 pounds, both of which indicate a nutritionally stressed population. The department will continue to monitor Unit 20A twinning rates and short yearling weights and may recommend fewer antlerless hunts in the

future if these two thresholds are surpassed. However, at the current density of moose the intention is to harvest moose at a rate of 1% of the population which has been shown to stabilize the moose population at its current level. Antlerless harvest will be by drawing permits for a majority of Unit 20A and a registration permit outside the Fairbanks nonsubsistence area in northwest Unit 20A near Nenana. The harvest objective will be based on the most recent survey results. The three-year average antlerless moose harvest in Unit 20A is 80 moose. The department did not issue antlerless moose permits in 2022 because of a severe 2021/2022 winter and the anticipated high mortality. The department will evaluate overwinter survival and other factors throughout 2022 and early winter 2023 to determine if and how many antlerless permits will be issued in fall 2023.

The number of moose in Unit 20A was estimated at 17,768 (3.5 moose/mi<sup>2</sup>) in 2003. Research indicated this high-density moose population was experiencing density-dependent effects, including low productivity, relatively light calf weights, and high removal rates of winter forage. The objective beginning in regulatory year 2004–2005 (RY04) was to reduce moose numbers to the population objective of 10,000–12,000 moose (1.5–1.8 moose/mi<sup>2</sup>) unless indicators of moose condition showed signs of improvement at higher densities. In 2016, the Board of Game adopted the IM population objective of 10,000–15,000 moose and the 2021 population estimate is within the IM objective.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-045)  
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**PROPOSAL 181**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
(18)		
...		
Unit 20(B), that portion within Creamer’s Refuge		
...		
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27 (General hunt only)	Sept. 1–Nov. 27

<p>1 antlerless moose by muzzle-loader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area</p>	<p>Dec. 1–Jan. 31 (General hunt only)</p>	<p>Dec. 1–Jan. 31</p>
<p>Unit 20(B), remainder of the Fairbanks Management Area</p>		
<p>...</p>		
<p>1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or</p>	<p>Sept. 1–Nov. 27 (General hunt only)</p>	<p>Sept. 1–Nov. 27</p>
<p>1 moose by targeted permit only; up to 100 permits may be issued</p>	<p>Season to be announced by emergency order (General hunt only)</p>	<p>No open season.</p>
<p>Unit 20(B), that portion within the Minto Flats Management Area</p>		
<p>RESIDENT HUNTERS:</p>		
<p>...</p>		
<p>1 antlerless moose by registration permit only</p>	<p>Oct. 15–Feb. 28 (Subsistence hunt only)</p>	<p>No open season.</p>
<p>...</p>		
<p>Unit 20(B), the drainage of the Middle Fork of the Chena River</p>		
<p>1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or</p>	<p>Aug. 15–Nov. 15 (General hunt only)</p>	

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb. (General hunt only)	No open season.
...		
Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway		
...		
1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Last day of Feb. (General hunt only)	No open season.
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
Remainder of Unit 20(B)		
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14 (General hunt only)	No open season
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order (General hunt only)	No open season.
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. 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.

If antlerless moose hunts are not reauthorized, the moose population may exceed population objectives causing habitat degradation and a loss of opportunity to hunt a surplus of antlerless moose. Furthermore, subsistence hunters in the portion of Unit 20B in the Minto Flats Management Area may not have a reasonable opportunity to pursue moose for subsistence uses.

The reauthorization of antlerless moose hunts in Unit 20B will allow the Alaska Department of Fish and Game (ADF&G) to manage the moose population within the population objectives of 12,000 to 15,000 moose. Hunting opportunity and harvest will increase and allow ADF&G to manage this moose population at optimum levels. The additional harvest is necessary to meet intensive management harvest objectives while maintaining bull-to-cow ratios within objectives. Subsistence hunters will have reasonable opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at levels compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The moose population level in Unit 20B is currently within the population objective of 12,000–15,000 moose. The population declined from an estimated 20,173 moose in 2009 to 11,064 in 2015, due in large part to antlerless moose hunts designed to lower the population to those objectives. The population increased slightly to 12,871 moose in 2017 and was estimated at 12,479 in 2020. To maintain the current population level the department recommends limited antlerless hunts in the Minto Flats Management Area (MFMA) and the Fairbanks Management Area (FMA). The department will continue to monitor the moose population and may implement additional antlerless hunts if the population continues to trend upward.

*Fairbanks Management Area (FMA)*—The purpose of this antlerless hunt is to regulate population growth in the FMA and reduce potential moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA is high and they pose significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest and reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during RY99–RY10. Moose–vehicle collisions and moose nuisance problems have remained lower since, presumably, in part due to consistent antlerless moose harvests.

*Minto Flats Management Area (MFMA)*—The primary purpose of this antlerless hunt is to provide a reasonable opportunity for subsistence uses and to regulate the moose population in the MFMA.

The MFMA moose density was high in 2010 (4.4 moose/mi<sup>2</sup>). To reduce the moose population, the harvest of antlerless moose during RY12 and RY13 was about 2.5% of the population. The fall 2015, 2017, and 2019 estimates showed more appropriate densities of 1.6, 1.7, and 2.0

moose/mi<sup>2</sup>, respectively. Because the population level has been stable and within the population objectives, the antlerless harvest has been reduced to approximately 1% of the total population to maintain the current population level.

*Targeted Hunt*—The purpose of the targeted hunt is to allow the public to harvest moose that are causing nuisance or public safety issues. These permits are used sparingly but allow the public to harvest the moose instead of the department just dispatching them.

Due to severe winter weather and anticipated high levels of natural mortality, the department did not issue antlerless moose drawing permits for certain hunts within Unit 20B for fall of 2022, and does not intend to hold the fall antlerless registration hunt in the MFMA. Reauthorization of these antlerless hunts is needed to retain the management options, as described for each hunt, to maintain appropriate moose abundance levels. The department will evaluate overwinter survival in the area along with other factors throughout 2022 and early winter 2023 to determine if and how many antlerless permits will be issued in Fall 2023.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-044)  
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**PROPOSAL 182**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
-----------------------------	---	------------------------------------

(18)

...

Unit 20(D), that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River, except the Delta Junction Management Area and the Bison Range **Controlled Use Area** [YOUTH HUNT MANAGEMENT AREA]

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion in the Delta Junction Management Area; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25  
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10–Nov. 25  
(General hunt only)

...

Unit 20(D), that portion within the Bison Range Controlled Use Area

...

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf;

Sept. 1–Sept. 30  
(General hunt only)

Sept. 1–Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15  
(General hunt only)

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25  
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10–Nov. 25  
(General hunt only)

NONRESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15

...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually. The objectives of the Unit 20D antlerless moose hunts are to 1) stabilize population growth of this high-density moose population; 2) address concerns about range degradation, reduced nutritional condition, and reduced reproductive success; 3) make progress toward meeting the Unit 20D intensive management (IM) harvest objective of 500–700 moose; and 4) provide youth and disabled veteran hunting opportunity.

If antlerless moose hunts are not reauthorized, the moose population could quickly increase to levels beyond the ability of the habitat to support the moose population. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Additionally, the population may need to be reduced dramatically if populations increase substantially.

Antlerless moose hunts have been conducted in southwest Unit 20D, which has the highest moose density in the unit. This area has demonstrated population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 30 years. Total moose harvest in all of Unit 20D averaged 270 moose (an average of 252 bulls and 18 antlerless moose) during regulatory years 2018 and 2019.

Antlerless hunting opportunity is limited at present because this opportunity helps to maintain the moose population within the ability of habitat to support the population. The 2020 population estimate for southwest Unit 20D was 3,399 moose (corrected for sightability) with a density of 3.3 moose per square mile, 32 calves:100 cows and 23 bulls:100 cows. The population has been relatively stable for a decade. Bull:cow ratios have been below 30:100 for the past 5 years, and twinning rates are among the lowest observed in the state (<10%).

Continued antlerless harvest will likely be needed to maintain the population at the optimal density and will help make progress toward the IM harvest objective of 500–700 moose without reducing bull-to-cow ratios below the management objectives. The population trend and harvest rate suggest the low, consistent antlerless harvest provided by the drawing permit hunts in Unit 20D, in conjunction with other mortality factors, is an appropriate rate of antlerless moose mortality that contributes to stability in the southwest Unit 20D moose population. The department did not issue antlerless moose drawing permits in southwest 20D for the fall of 2022 due to the severity of the 2021/2022 winter and the anticipated increase in natural mortality. The department will evaluate browse removal, twinning rates and abundance and other factors throughout 2022 and early winter 2023 to determine if and how many antlerless permits will be issued in fall 2023.

The department will continue to evaluate antlerless moose hunts and their effect on moose density and population growth while monitoring indices of density-dependent moose nutritional conditions in relation to changes in moose density, including proportional removal of current annual growth of winter browse, proportion of females with twin calves, and late-winter calf weights.

Additional drawing or registration permits will be issued only if more harvest is needed in specific areas to maintain optimal moose densities.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-043)  
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**PROPOSAL 183**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(18)		
...		
Unit 20(E), the remainder of of the Ladue River Controlled Use Area		
<b>RESIDENT HUNTERS</b>		
...		
1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing	Aug. 5–Sept. 5 (General hunt only) Oct. 15–Nov. 30 (General hunt only)	

hunt; a person may not take a cow accompanied by a calf; or

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15–Nov. 30  
(General hunt only)

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

Unit 20(E), that portion outside of the Ladue River Controlled Use draining into the Ladue River upstream of the South Fork of the Ladue River, the Dennison Fork of the Fortymile River, and the Mosquito Fork of the Fortymile River drainage.

RESIDENT HUNTERS

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or

Aug. 5–Sept. 5  
(General hunt only)  
Oct. 15–Nov. 30  
(General hunt only)

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15–Nov. 30  
(General hunt only)

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5–Sept. 5  
Oct. 15–Nov. 30

...

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The Unit 20E antlerless moose hunts were originally passed by the Board of Game in March 2022, and the primary objectives of the hunts are: 1) slow population growth to avoid habitat damage, 2) help achieve Intensive Management (IM) harvest objectives, and 3) provide the management flexibility to rapidly respond to changes in nutrition.

The moose population within a portion of southern Unit 20E has shown consistent growth since 2005 and has approximately doubled since then, with the cow component of the population growing at a significantly faster rate than the bull component of the population. Moose densities within a 1,821 mi<sup>2</sup> area along the Taylor Highway in southern Unit 20E increased from 0.68 moose/mi<sup>2</sup> in 2005 to 1.36 moose/mi<sup>2</sup> in 2020, with an estimated annual growth rate of 4.9%. The cow segment of the population grew at an estimated 5.8% per year while the bull segment of the population, which is limited by higher natural mortality and harvest, grew at half the rate. Slowing the population growth rate in order to avoid habitat damage is largely dependent on the ability to control the growth of the female component of the population.

Antlerless harvest will help achieve IM harvest objectives without reducing bull:cow ratios below management objectives. The Unit 20E IM harvest objective is 250–450 moose, and the RY17–RY21 annual average unit-wide reported harvest was 209 moose. Unless nutritional indices decline, the department’s general goal is to harvest 1% or less of the moose population within the antlerless hunt area, which equates to approximately 30 or less moose. This level of harvest would contribute substantially to meeting IM harvest objectives.

Moose nutritional levels are currently healthy in Unit 20E, and the antlerless harvest framework provides management flexibility to rapidly respond to potential future changes in nutrition. Twinning rates are currently 39% (2018-2021 3-year weighted average), and the department closely monitors these rates given the potential for them to lag as a reflection of population-level nutritional condition. The antlerless harvest framework not only provides the ability for the department to rapidly respond to potential future changes in twinning rates (or other nutritional indices), but it also provides the ability to proactively reduce population growth rates in order to maintain the current high nutritional levels.

If the Unit 20E antlerless moose hunts are not reauthorized, and the population growth rates from the last 15 years continue, the ability to stabilize or reduce the population in the future might be inhibited by logistical and social issues. For example, although portions of the area are road

accessible, large portions are more remote, and there are logistical challenges to distributing harvest (especially higher levels of harvest) throughout the area. Furthermore, if past growth rates continue unabated and nutritional condition declines, social challenges could occur if more rapid and severe management action (e.g., high number of hunters) was necessary.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-042)  
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**PROPOSAL 184**

**5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during March in a portion of Unit 21D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<p>(19)</p> <p>Unit 21(D), that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek</p> <p>RESIDENT HUNTERS:</p> <p>...</p> <p>1 moose, by registration permit only, up to 15 days during March; a person may not take a cow accompanied by a calf</p> <p>...</p>	<p>(Winter season to be announced)</p>	

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose recently emerged because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost, and our ability to meet Intensive Management (IM) harvest objectives could be reduced. In addition, rather than allow the population to go through dramatic rates of expansion and contraction, it is prudent to dampen the current accelerating rate of increase.

The Intensive Management (IM) harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2012–2021 was 401 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not met the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make

progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. Subsistence hunters will benefit from the opportunity to harvest cow moose.

Analysis of three Trend Count Areas (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough TCAs) within the Kaiyuh Flats in this hunt area increased in moose abundance among all age classes, and adult moose abundance was 32% above the 18-year average by 2021. Geospatial Population Estimate data also increased from 1,897 ( $\pm 11\%$ ) moose in 2011 to 4,116 ( $\pm 10\%$ ) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates between 2004 and 2021 (avg. = 36%), although the 5-year twinning rate average (2017-2021) was 29%.

The portion of 21D affected by this reauthorization is approximately 21% (2,559 mi<sup>2</sup>) of Unit 21D (12,093.6 mi<sup>2</sup>). Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the total moose estimated in Unit 21D at 10,478 moose ( $\pm 1,572$ ) in 2021. The mid-point for the total 21D moose population estimate was above the IM population objective for all of Unit 21D (12,093.6 mi<sup>2</sup>) of 9,000–10,000 moose.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-041)  
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**PROPOSAL 185**

**5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during part of February and March in Unit 21E as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(19)		
...		
Unit 21(E)		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, a person may not take a cow accompanied by a calf	Feb 15 – Mar 15	
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

This moose population is beginning to show signs of nutritional stress. The most current survey in 2019 indicated there are 9,777 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000–11,000 moose. There is currently a harvestable surplus of 390 moose; approximately 200 moose are harvested each year and there are additional moose available to harvest. Bull-to-cow ratios are high, with 42 bulls per 100 cows in 2018. The Intensive Management (IM) harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 2.1 moose/mi<sup>2</sup> in 2019. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. The 2-year average twinning rate in the Holy Cross area is 19%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 41%. The current intensive management plan calls for stabilizing the population through harvest when the 2-year average twinning rate is 15–20%. Browse utilization is high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-040)  
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## **PROPOSAL 186**

### **5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

...

**What is the issue you would like the board to address and why?** Brown bear tag fee exemptions must be reauthorized annually. Reauthorizing the exemption allows residents who have not purchased the \$25 brown bear tag to take bears opportunistically. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically.

Region III (Interior and Northeast Alaska) brown bear populations are healthy, and harvest is monitored through the brown bear sealing requirement. Reauthorizing all resident brown bear tag fees throughout Region III maintains simpler regulations, high resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization includes tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

The Alaska Department of Fish and Game estimates that brown bear harvest accounts for less than 6% of the bear population. Harvest is composed primarily of males and is sustainable. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed by adjusting seasons and bag limits. The absence of resident tag fees that were in place prior to 2010 appears to have little effect on net harvest across the region in general.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-038)  
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**PROPOSAL 187**

**5 AAC 92.015. Brown bear tag fee exemption.**

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

**5AAC 92.015. Brown bear tag fee exemption**

(a) A resident tag is not required for taking a brown bear in the following units:

(1) Unit 11;

(2) Units 13 and 16(A);

(3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

(1) Unit 9(B);

(2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);

(3) Unit 17;

...

**What is the issue you would like the board to address and why?** Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for bear hunts near communities in Units 9 and 10 to address public safety concerns in communities. Brown bears are abundant in Units 9 and 10 and are managed primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The liberalized bear seasons and bag limits adopted along with the elimination of the tag fee were intended to allow people to take bears opportunistically, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-037)  
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**PROPOSAL 188**

**5 AAC 92.015. Brown bear tag fee exemptions.**

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

- ...
- (4) Units... 26;
- ...
- (8) Unit 22;
- (9) Unit 23;
- ...
- (13) Unit 18;
- ...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- ...
- (4) Unit 18;

- ...
- (7) Unit 22;
- (8) Unit 23;
- ...
- (10) Unit 26(A)

**What is the issue you would like the board to address and why?** The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. We recommend continuing resident tag fee exemptions for the general season and subsistence season hunts in Region V (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 9 years; Unit 22, where the tag fee has been exempted for 19 years; Unit 23, where the tag fee has been exempted for 14 years; and Unit 26A, where the tag fee has been exempted for 9 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for RY2012 and harvest has remained within sustained yield and continues to be similar to the preceding ten-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements include: 1) registration permit, 2) tag fee exemption, 3) salvaging meat for human consumption, 4) no use of aircraft in Units 22, 23 and 26A, 5) no sealing requirement unless hide and skull are removed from subsistence hunt area, and 6) if sealing is required, the skin of the head and front claws must be removed and retained by ADF&G at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADF&G for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, we estimate 0–3 bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging fewer than one bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest has been fewer than five bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between zero and five bears are taken annually by subsistence hunters.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-036)  
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