

Nome Area – Unit 22

PROPOSAL 18

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

Open the caribou season in a portion of Unit 22A as follows:

Open up the caribou season in Unit 22A in all Golsovia River drainages and north of the Klikitarik River for resident and nonresident hunters.

What is the issue you would like the board to address and why? I would like to see the caribou season in Unit 22A south of and including the Golsovia River opened back up. Now I realize the Western Arctic caribou herd has been in decline. But the reason for closing this area to hunting caribou was unwarranted. The Stebbins and Saint Michael reindeer herders claimed there were no caribou down here and that local villages were coming up and killing their reindeer and calling them caribou. The truth is, there has always been caribou scattered up in the hills. If you look online, you can find documented cases of caribou that were found in the Andreafski hills back in the late 1800's. They were described as a smaller herd that didn't migrate like other herds in the state. They also tell stories from long ago of a herder who lost his herd between Saint Michael and Saint Mary that scattered and stayed up in the hills. I believe there is truth in both of these stories. I also know that when the caribou used to migrate down this way in the winter several would stay behind and mix in with other caribou and wild reindeer. So there has always been a herd if not smaller of caribou/wild reindeer in this area.

Now that first year the season was shut down, man oldest son run into some caribou up in Chief Mountains at the headwaters of the Golsovia. And when word got out, guess who were the first ones to go after them. The same reindeer herders that were telling everyone to quit hunting caribou because they are reindeer. Shutting this season down has stopped nothing. Yukon people are still coming up and hunting these caribou/wild reindeer and so are people from up north.

The only thing shutting this season down has done, was make it for someone like myself whom holds a guide license, unable to legally harvest caribou in this area. I don't believe anyone had done their homework when they closed down this season. I've been trapping, subsistence hunting and guiding in this area for 28 years and was not even aware they were thinking of shutting it down until afterwards. I've heard some of the herder's report of the herd size as much as 5,000 to 6,000 animals. When they fly around and do their count, they are going as far back as the head waters of the Andreafski, the upper Golsovia and beyond. There are caribou/wild reindeer scattered from the hills above Kotlik, through Step Mountain, Chief Mountains, the Nulato hills over to Needle Mountain and all the way north to upper South River of the Unalakleet River. Just north of the Golsovia River in Unit 22A, the season is open. And they have a fall season just over the ridge in Unit 21E. I think it only fair to open up the Unit 22A Remainder to caribou hunting, if nothing else at least in the Golsovia River drainages or north of the Klikitarik River. All that land is past the corporation property and gives a buffer zone for the local reindeer herd to free range in without being bothered.

Resident hunters and the few nonresident hunters should not be penalized because of the fact that the reindeer are just running wild. As stated, I realize the caribou herd has been in decline and this is not the time to expand the regulation. But this in my opinion is a regulation that should of never been instated. I would like to see it reopened, even if the limit is set as one caribou per hunter per year.

PROPOSED BY: Johnny Richardson

(EG-F23-167)

PROPOSAL 19

5 AAC 92.052. Discretionary permit hunt conditions and procedures.

5 AAC 92.151. Destruction of trophy value of game required in specific areas.

Change the trophy destruction requirements for muskox taken in Unit 22 subsistence hunts as follows:

Destruction of the horn at the kill site should remain and a section of horn should still be required to be submitted to ADF&G.

The new regulation would state: “The hunter must submit at least 5” of horn surrounding the eye socket to ADF&G.” (This is written to replace the language on page 32 of the regulation book.)

What is the issue you would like the board to address and why? Tier II muskox hunt trophy destruction. Horn destruction and submission to ADF&G for a subsistence hunt is appropriate. Currently the section of muskox horn that must be submitted to ADF&G to meet the trophy destruction is from within two inches of the eye to the tip. This is the section of horn that has the most use for crafts and other projects. One important aspect of subsistence hunting is to use as much of the animal as possible. Allowing the hunter to keep the horn ends while submitting a mid-section of horn would allow hunter to better utilize the horn.

PROPOSED BY: Southern Norton Sound Fish and Game Advisory Committee (HQ-F23-022)

PROPOSAL 20

5 AAC 85.050. Hunting seasons and bag limits for muskoxen.

Change the bag limit for Tier II muskox hunts in Unit 22 to one muskox every two years as follows:

Establish a multi-year bag limit for all Unit 22 Tier II musk ox hunts as follows:

Unit 22A. One bull by permit every two years. TX090

Unit 22B east of the Darby Mtns., including drainages of the Kwiniuk, Tubutulik, Koyuk, and Inglutalik rivers. One bull by permit every two years. TX105

Unit 22B remainder. One bull by permit every two years. TX105

Unit 22C that portion of the Snake River drainage... mouths of the Nome River and the Snake River. One bull by permit every two years. TX095

Unit 22C that portion of drainages flowing into Norton Sound... to the Safety Bridge. One bull by permit every two years. TX096

Unit 22D that portion west of the Tisuk... confluence with Tuksuk Channel. One bull by permit every two years. TX103

Unit 22D Kuzitrin River drainage (includes Kougarok and Pilgrim rivers). One bull by permit every two years. TX102

Unit 22D remainder. One bull by permit every two years. TX102

Unit 22E. One bull by permit every two years. TX104

What is the issue you would like the board to address and why? Under the points-based Tier II system, recipients of muskox hunting permits are limited to a relatively small pool of residents who are able to claim the maximum number of points on their application every year. Although the spirit of this system is in good faith and was established for good reason it eliminates longtime residents of communities who score slightly fewer points. This has led to a heavily skewed and very uneven distribution of the muskox resource in Unit 22 and added additional frustration for residents that perceive negative impacts from muskox without being able to benefit from the animal in any tangible way. Members of the Northern Norton Sound Advisory Committee have voiced frustration with the allocation of permits as well as heard testimony from many frustrated members of the public.

Because of the current population of muskox in Unit 22 and the amount necessary for subsistence, it is not practical to address the frustrations of the community by issuing more tags. This would run contrary to the current management plan and the sustained yield principle. My proposed solution is to establish a multi-year bag limit to ensure that permittees, who are successful in harvesting a muskox, cannot be selected for a permit two years in a row, allowing for increased participation in a subsistence hunt, albeit on a biennial basis.

Under the Tier II system it is anticipated that there is not a reasonable opportunity for all eligible residents to participate in subsistence hunting, so applications are scored. This proposal would not change that, nor would it change a hunter's opportunity to participate in a subsistence hunt two years in a row if they were not successful in the first year. Only if a muskox was harvested in one hunt would the bag limit be met and the hunter would be ineligible for the permit the following year, opening up the opportunity for another eligible resident to participate in the subsistence hunt.

PROPOSED BY: Jacob Mannix

(EG-F23-207)

PROPOSAL 21

5 AAC 85.050. Hunting seasons and bag limits for muskoxen.

Establish season dates for the harvest of cow muskox in the TX095 and TX096 Tier II hunts in Unit 22C, beginning August 1st and ending October 31st as follows.

"R 22C that portion...and the Snake river" One Bull ... TX095 Aug 1- Mar 15

One Cow ... TX095 May be Announced Aug 1- Oct 31

"R 22C that portion... to the Safety bridge" One Bull ... TX096 Aug 1- Mar 15

One Cow ... TX096 May Be Announced Aug 1- Oct 31

What is the issue you would like the board to address and why? Traditional harvest of muskox takes place during the winter and spring months from approximately December through the end of season on March 15th. Selection of this timeframe for optimal harvest can be attributed to several reasons, primarily the quality of meat post-rut, quality of the hide mid-winter, and ease of access and transportation of meat by snowmobile. Harvest outside of this timeframe has become very uncommon since residents of the Seward Peninsula have learned over the years that the prolonged rutting season of muskox has a significant effect on meat quality and the valuable qiviut in the hide is prime later in the winter. However, growing concern over human- muskox encounters over the years, followed by the recent human fatality caused by a muskox has spurred discussion of increased hunting to attempt to disperse or decrease the number of muskox present in certain areas.

The Alaska Department of Fish and Game has recently changed the bag limit for the TX095 and TX096 hunts to include the harvest of cow muskox. This was largely, if not solely, due to the recent muskox caused human fatality, a response to the following public outcry, and an effort to dissuade or disperse muskox herds from the near Nome areas. However, this may have little to no effect if the increased harvest is not targeted to a specific date range when muskox would normally not see any hunting pressure.

The current season dates allow for the harvest of muskox beginning August 1st, and ending March 15th, but as stated previously, the vast majority of the harvest occurs in the mid to late winter months. There is little reason for this harvest pattern to change and over the last number of years harvest during the mid and late winter months has not proven successful in deterring muskox presence from the near Nome areas.

If season dates were to be established for the harvest of cow muskox for the early part of the season it may be enough of a deterrent during the rut to move animals away from areas where human-muskox encounters are more likely to be problematic. Establishing season dates would ensure that consistent hunting pressure is applied in the relatively small areas of the inner and outer Nome areas and may educate muskox faster. Additionally, cow muskox are not known to undergo the strong physiological changes that male muskox go through during the rut and the meat will still be of good quality, although the qiviut will be poor or non-existent.

Finally, establishing season dates for the cow muskox hunt does not compel the department to hold a cow muskox season. Under the current regulatory structure there may, or may not be, cows available for harvest. This proposal, if adopted would only set the window of time during which a cow muskox may be harvested if there is any allowable harvest.

PROPOSED BY: Jacob Mannix

(EG-F23-235)

PROPOSAL 22

5 AAC 92.080. Unlawful methods of taking big game; exceptions.

Establish a minimum caliber for moose hunting in Unit 22A and a portion of Unit 22B as follows:

A set minimum .243 caliber size rifle for moose hunting in Units 22A and a portion of 22B in the Koyuk and Inglutalik River drainages.

What is the issue you would like the board to address and why? Minimum rifle caliber for moose hunting in Unit 22A and a portion of Unit 22B in the Koyuk and Inglutalik Rivers drainages. In the last several years, reports of moose being wounded and not recovered have increased. In many instances, young adults (in their teens and twenties) shooting small caliber rifles have been responsible for these reports. In 2022 alone, two moose were harvested in the Unalakleet River drainage that had evidence of rifle wounds. Small caliber bullets were recovered from both. Setting a minimum caliber for moose hunting is one part of a larger effort to better educate hunters in the area. The Southern Norton Sound Advisory Committee has been working with ADF&G to increase hunter education classes within communities of the Southern Norton Sound Area. Another possible regulation would be to require one person in a hunting party to possess a larger caliber rifle if there was a young hunter carrying a smaller caliber rifle.

PROPOSED BY: Southern Norton Sound Fish and Game Advisory Committee (HQ-F23-021)

PROPOSAL 23

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

Revisit the Amount Reasonably Necessary for subsistence uses for moose in Unit 22 as follows:

ADF&G is making sound management decisions based off of current data, not data that is over 20 years old. The Amount Necessary for Subsistence for moose hunting needs to be revisited and revised to reflect the current situation for local residents in Unit 22.

What is the issue you would like the board to address and why? The information on the Amount Necessary for Subsistence (ANS) for moose in Unit 22 is over 20 years old (24 years) and should be updated with current data on subsistence users' needs. Communities on the Seward Peninsula have grown substantially in the last 20 years. The Nome population has almost doubled. According to the ADF&G data for 2022, 539 permits were given to Unit 22 local residents. The 2022 harvest in Unit 22B west was at 32, Unit 22C harvest was at 33, Unit 22D Kuzitrin/Pilgrim/Teller was at 38, and Unit 22D Remainder is at 15, with the total harvest of moose in these Units at 118.

By moose harvest tickets issued alone many residents are not getting a moose. The cost of meat in stores alone in rural Alaska is extremely high. Many residents within Unit 22 highly depend on moose meat to offset this cost as well as prefer moose over store bought meat. For several years Unit 22 residents have gone over the quota amounts as set forth by ADF&G staff; this indicates the need for moose by residents in Unit 22 is very high. A.S. 16.05.258(f) definition "An opportunity, as determined by the appropriate board, that allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant with a reasonable expectation of success of taking of fish or game." By definition, local subsistence moose hunters are not being allotted a reasonable amount of time to harvest moose when

quite often the moose hunt is closed the very next day after opening ex: fall of 2022 Unit 22C closed on day two of the hunt. In the Fall of 2022, the beginning of the moose hunt fell on a Thursday and closed on a Friday in Unit 22C. Many local residents simply cannot afford to take time off during the week to participate in a moose hunt, many local residents have to wait for Friday evening right after work or even the beginning of the weekend to start a moose hunt. These hunters are put at an extreme disadvantage, again by definition are not even being given a reasonable amount of time to participate in a hunt that is already closed.

PROPOSED BY: Kawerak, Inc, Melanie Bahnke President (EG-F23-306)

PROPOSAL 24

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

Modify the winter season for moose in Unit 22A as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(20)		
Unit 22(A), that portion in the Unalakleet River drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage		
1 antlered bull by registration permit only; or 1 antlered bull by registration permit only[; DURING THE PERIOD DEC 1- JAN 31, A SEASON MAY BE ANNOUNCED BY EMERGENCY ORDER]	Sept. 1 – Sept. 30 Dec. 1 –Jan. 31 [(SEASON TO BE ANNOUNCED)]	No Open Season

What is the issue you would like the board to address and why? Removing the requirement to announce the winter moose season in Unit 22A Central would provide Department of Fish and Game the flexibility to administer registration permit hunt RM844 during the full range of season dates adopted by the Alaska Board of Game (board) without the need to announce the season by emergency order.

The department began administering registration permit RM844 during regulatory year (RY) 2008 following a closure to moose hunting in the area RY2005-RY2007. The RM844 winter season exists to

provide additional opportunity to harvest a moose when the estimated harvestable surplus was not taken during the fall season which is managed under RM841. The department will issue an emergency order to announce the winter season when the harvestable surplus was not taken in the fall.

In the spring of 2021, the department completed a spring adaptive cluster sampling (ACS) moose survey within the Unit 22A Central area which resulted in a moose abundance estimate of 766 moose (90% CI: 643-888). These results indicated that the population has remained stable since the population was last surveyed in 2017. Additionally, results from a composition survey completed in 2020 indicated the bull:cow ratio in the area was above the management objective. The results of both the abundance and composition survey led to the decision to remove the quota for the Unit 22A Central moose hunt area beginning in RY21.

Now that there is no quota for the RM841/RM844 hunt, needing to announce the winter RM844 season by emergency order creates unnecessary regulatory burden. The RM844 hunt will still be managed as a registration permit and the department will retain the ability to close the season by emergency order if the harvestable surplus were to be lowered in the future as a result of updated abundance and/or composition data.

If adopted, the department does not anticipate the extended season will create a conservation concern. The RM844 winter hunt is administered as registration permit hunts and managed with harvest quotas. Successful hunters are required to report their harvest to the department within two days of the kill resulting in timely harvest information, and the department has the authority to issue an emergency order closure. Reported harvest for the RM844 hunt has been just 0-2 moose annually for the history of the winter hunt.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-059)

PROPOSAL 25

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

Close the nonresident moose hunting season in Unit 22C as follows:

Unit 22C - Moose - Nonresident - No Open Season.

What is the issue you would like the board to address and why? Address the nonresident moose hunt in Unit 22C. Currently Unit 22C is under a registration moose hunt with a strict quota system that is often met within the first two days. Many Nome area hunters are not getting a moose.

According to ADF&G data in 2022, 539 registration moose permits were issued to local area residents with 33 moose harvested in Unit 22C. Unit 22B West of the Darby's, Unit 22D Kuzitrin/Pilgrim/Teller, Unit 22D Remainder are all under a registration moose hunt and quota, in all of these units the nonresident moose hunt was the first hunt to be removed from regulation. This would imply local ADF&G staff are being allocative regarding the Unit 22C nonresident moose hunt.

PROPOSED BY: Kawerak, Inc. Melanie Bahnke President (EG-F23-305)

PROPOSAL 26

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

Lengthen the nonresident moose hunting season in Unit 22E by two weeks, to open on August 15 as follows:

Expanding the season in order to disperse hunting pressure, as well as allowing hunters opportunities on other species, brown bear and caribou that are in more abundance in August.

Nonresidents: Unit 22E - One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side by permit DM855 **August 15** [SEPT 1] through September 14.

What is the issue you would like the board to address and why? DM855 is a drawn hunt limited to ten nonresident moose tags, with the hunting season between September 1-14. Most of these nonresidents have contracted with registered guides to help with their hunt. In the past three years, the number of registered guides in this area has tripled, thus creating competitive hunting practices.

These particular two weeks in September also reduce the successful targeting of other migratory species since caribou have already moved on, and brown bears are seeking other food options along the coast in September.

PROPOSED BY: Justin Horton

(EG-F23-303)

PROPOSAL 27

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

Align the resident seasons for brown bear in Unit 22D and 22E with those in Unit 22B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(20)		
Unit 22(C)		
RESIDENT HUNTERS:		
1 bear every regulatory year by registration permit; or	<u>Aug. 1 – June 30</u> [AUG. 1 – OCT. 31] [APR. 1 – JUNE 30] (subsistence hunt only)	
1 bear every regulatory year by registration permit only	<u>Aug. 1 – June 30</u> [AUG. 1 – OCT. 31] [APR. 1 – JUNE 30]	
...		

Remainder of Unit 22

RESIDENT HUNTERS: Aug. 1 – June **30** [15]
2 bears every regulatory year (subsistence hunt only)
by registration permit; or

RESIDENT HUNTERS: Aug. 1 – June **30** [15]
2 bears every regulatory year

...

What is the issue you would like the board to address and why? Changing the resident season dates for brown bear in Units 22D and 22E would align the season with Unit 22B. Currently, the registration subsistence hunt (RB699) and general season hunt season for Units 22D and 22E end on June 15, while seasons in Unit 22B end on June 30, which creates unnecessary confusion for hunters and adds complexity to the regulatory language in the regulations book. The registration subsistence hunt (RB699) and registration hunt (RB670) for Unit 22C closes from November 1 to March 31. This proposed season change aligns the season dates for the registration subsistence and other registration permit hunt in Unit 22C with the other hunts in Unit 22B, 22D, and 22E. This should resolve confusion in the hunting regulations.

Changing the resident season dates for brown bear in Unit 22C would align the season with Unit 22B. Currently the season for Unit 22C is managed by a split fall and spring season, while the season in Unit 22B ends on June 30. The split season in Unit 22C creates unnecessary confusion for hunters and adds complexity to the regulatory language in the regulations book.

Very little harvest of brown bears occurs in Unit 22 during November – March so this extended season is not anticipated to have a biological concern.

This proposed season change should resolve confusion in the hunting regulations. Unit 22C brown bear hunting would still be managed by a quota according to the combined harvest under the RB670, DB685, and RB699 permits.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-061)

PROPOSAL 28

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

Change the Unit 22D and 22E nonresident brown bear drawing permit hunt to a general season hunt as follows:

I am recommending changing drawing tag DB690 to an over-the-counter tag beginning August 1, 2024. Nonresidents: Unit 22D/E - One bear every regulatory year [BY PERMIT] August 1-June 15.

What is the issue you would like the board to address and why? The brown bear population in Unit 22D and Unit 22E has been increasing, and harvest is low. Currently, the nonresident hunters that apply for the Unit 21 available nonresident bear tags are traveling to this area to primarily hunt caribou and

moose in the fall, with the bear being a bonus species. The caribou tags are over the counter, and moose tags are now a draw. Moose hunters unsuccessful in the draw but successful in drawing the brown bear are not coming to take advantage of the drawn brown bear tag. Changing from a draw to an over-the-counter tag would allow more nonresidents to purchase a metal locking tag and hunt for brown bears in Unit 22D and Unit 22E. This increases revenue for Alaska and the local area and potentially the harvest of more brown bears by guided nonresidents.

PROPOSED BY: Justin Horton

(EG-F23-302)

PROPOSAL 29

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

Increase the number of brown bear drawing permits available in Unit 22B for DB685 to 40 permits, or change DB685 to a registration permit as follows:

I would like the Board of Game to keep the draw hunt number DB685 for Unit 22B and to issue 40 nonresident permits or make Unit 22B a registration hunt. Registration would be better and cheaper for the department.

Every year since the DB685 was adopted it has been undersubscribed. Every year, ADF&G has to go back and forth between draw results and issue undersubscribed permits creating more paperwork and work for both the department and users. As a commercial operator this is difficult at times, but I also understand this is just the cost of doing business. I would like Board of game to not include Unit 22C nonresidents, but to be on a separate DB or RB number. This would allow additional user opportunities for both areas and there not being a biological concern. I don't see a problem with this, nor will see an increase in harvest. This would simply allow nonresidents for an increase of opportunity. If adopted, please make the registration via online or in person at any ADF&G office. If the board does not increase or make Unit 22B a registration hunt, I would ask the board not to change anything to DB685.

What is the issue you would like the board to address and why? DB685 includes both Unit 22B and Unit 22C and they issue 27 permits for grizzly for nonresidents. Any left over permits after the draw period become undersubscribed. DB685 was adopted in 2012 and has been undersubscribed every year. Twentyseven permits are being issued between the draw and undersubscribed application periods and not all of them are being used. The problem is once they are issued, an individual like myself cannot not book another hunt because of no permits left over. A lot of these permits are being issued and not being filled. In this area there is a one bear bag limit for nonresidents and two bear for residents per regulatory year. There is definitely not a biological concern for grizzly in Unit 22B. As for a matter of fact many locals have told me to harvest more bear. The harvest has been around fifteen bears annually between Units 22B and 22C. Units 22B and 22C should be separated. A majority of the pressure is in Unit 22C around the Nome area. Unit 22B is a much much larger area (164.46 miles by 85.67 miles) than Units 22C (74.55 miles by 38.14 miles) and far more remote than Unit 22C. ADF&G has had one emergency closure in Unit 22C when 25 bears were harvested. I believe with the size of Unit 22B and the number of bears in Unit 22B, it could handle 45 bear harvests.

PROPOSED BY: James Smith

(EG-F23-204)
