Central & Southwest Region Meeting

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ALASKA BOARD OF GAME

Central and Southwest Region Meeting Best Western Lake Lucille Inn, Wasilla, Alaska January 10 - 17, 2025

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, January 10, 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 <u>SIGN UP</u> 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, January 11, 8:30 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

Sunday, January 12, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded BOARD DELIBERATIONS upon conclusion of public testimony

Monday, January 13 thru Thursday, January 16, 8:30 a.m.

BOARD DELIBERATIONS continued

Friday, January 17, 8:30 a.m.

BOARD DELIBERATIONS continued/conclude

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

Agenda Notes

- 1. 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 or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- 2. A live audio stream for the meeting is intended to be available at: https://boardofgame.adfg.alaska.gov
- 3. 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 465-4110 no later than two weeks prior to start of the meeting to make any necessary arrangements.

Regionwide & Multiple Units

PROPOSAL 1

5 AAC 92.015. Brown bear tag fee exemption.

Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units 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 brown bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 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 bear seasons and bag limits adopted in 2011 along with the elimination of the tag fee were intended to allow people to take bears before they destroy property, 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.

<u>Subsistence Brown Bear Hunts</u>: 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 from the general season hunts for hunters who take brown bears primarily for their meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Note: This proposal addresses Game Management Units outside the scope of the Central Southwest Region meeting.

PROPOSAL 2

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

5 AAC 95.052. Discretionary permit hunt conditions and procedures.

Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal as follows.

Proposed changes to the following bear baiting seasons are:

Units 1A, 1B, 1C, 1D, 2-3, 5	Apr 15-June 15 / Sept 1-Oct 15
Units 6A, 6B, 6C	Apr 15-June 15 / Aug 20-Oct 15
Unit 6D	Apr 15-June 10 / Sept 10-Oct 15
Units 7, 9, 11-13, 14A & B, 14C Remainder, 15, 20	Apr 15-June 30 / July 1 - Oct 15
Units 16, 17, 18, 19, 21, 22, 23, 24, 25	Apr 1 - Jun 30 / July 1 - Oct 15

With these changes in season dates and caribou herds dropping throughout the State of Alaska, the Department of Fish and Game can regulate / put in emergency orders if the bear population drops too low. In certain units of Alaska, it is harder for some hunters / subsistence users to gain access to their bear baiting sites and being able to hunt them due to the rivers not being safe to travel on.

What is the issue you would like the board to address and why? The Bethel Advisory Committee proposes to have two (2) bear baiting seasons in the State of Alaska in Units where bear baiting is legal. Hunters and subsistence users will have better opportunities to take bears during a two (2) season bear baiting. In certain units throughout the state, hunters & subsistence users may only have two (2) to three (3) weeks to get a legally take a take. There are nineteen (19) out of twenty-six (26) units in Alaska with a NO CLOSED SEASON for black bears.

Note: This proposal addresses Game Management Units outside the scope of the Central and Southwest Region meeting.

PROPOSAL 3

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

Allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 9, 11, 13, 14B, 16, and 17 as follows:

I would like the Board of Game to allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 7, 9, 11-13, 14A, 14B, 15-21, 23-25, 26B, and 26C, during applicable seasons (same units as airborne). This allows an easily enforceable regulation for law enforcement with concise purpose of use and time when these cameras can be used.

What is the issue you would like the board to address and why? Currently hunters are not allowed to use any camera or other sensory device that can send messages through wireless communication. This includes cellular game cameras over bear bait. These were prohibited with the assumption that this would give an unfair advantage to hunters, yet despite when the hunter gets a photo, he would still have to travel to hunt his bait station often requiring hours of travel

that is not feasible in a reasonable amount of time or the day of. In many units, hunters are already allowed to hunt bears same day airborne as long as they are 300 feet from a plane, which gives a higher advantage than a wireless cell camera could for most hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Caleb Martin (EG-F24-037)

PROPOSAL 4

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

Establish general season, archery only sheep hunts in Units 9, 11, 13, 14A, and 14B as follows:

Units 9, 11, 13, 14A, 14B (or limited to a specific combination of areas if managers see fit), HT sheep areas only: 1 ram with full curl horn or larger by bow and arrow only, HT, August 6 - August 9. (Or July 21-31 if an earlier date is preferred)

What is the issue you would like the board to address and why? For many years hunters in Alaska have requested an opportunity to hunt for sheep with archery equipment but there still remains no season or area (aside from the highly sought after DS140/141 draw tags) during which hunters can pursue sheep with a bow and arrow without the pressure and danger associated with hunting during the general rifle season. The author of this proposal has personally been shot at while stalking by rifle hunters who weren't aware of his presence and other anecdotes exist of hunters finding themselves near sheep that others are shooting from far away. The increased popularity of long-range shooting for mountain animals has increased this hazard. (A recent ADF&G survey study on goat harvest in Southeast Alaska showed that about 23% of shots were over 300 yards and some were out to 600!)

In addition, there is an ever-increasing population of hunters who are interested in pursuing sheep with a bow and arrow but who did not feel that there is adequate opportunity to do so without competing directly with rifle hunters especially in "walk-in" areas but also in areas where most hunter fly.

Currently there is a four-day gap between the youth season and the general season in most areas. In the past some opposition to sheep season proposals raised concerns that it would interfere with the youth season, but this would remove that concern because it takes place after the youth season is over. There have also been concerns about archery hunters displacing sheep but many studies from sheep biologists in Canada and Alaska have shown that rams do not move far from their established areas in the pre-rut period even when disturbed. In the worst case the rams spooked by bow hunters might move a few miles but often they just go into nearby escape terrain where they are safe from bowhunters. I have witnessed this behavior many times when bowhunting sheep in multiple mountain ranges of Alaska and even after spooking them, they almost always remain in sight or are easily relocated in an adjacent area. The displacement of sheep by bowhunters in an

early season is simply not a legitimate concern and any skilled mountain hunter will attest to being able to easily relocate sheep that were recently disturbed by a hunter.

The success rates of archery hunting for sheep are also very low so the effect on harvest will be essentially negligible but the increased opportunity will be greatly appreciated by all sheep hunters who are willing to accept some added challenge.

Further concerns have been raised in the past in regard to an early sheep season because it would allow for aerial scouting during season because of the scouting being allowed up to August 10. Please see the other proposal by this author which hopes to establish the "no aerial scouting" period to start on August 1 instead of August 10.

Also, as a matter of precedent, ADF&G has added early archery moose seasons to some of the areas up for proposals this year, including Units 14A and 14B. This has worked well and I'm not aware of any complaints that early season archery moose hunters have had any adverse effects on rifle hunters using the same areas later in the season.

If interference with other hunters was a significant concern, another option could be to move this hunt to July 20th (or some other date at the pleasure of the board), ending by August 1, so as not to interfere (as concerns were raised in the past) with the youth season and to still allow a small period before the general rifle season.

It is also important to note that archery seasons and areas have become very popular and well accepted throughout north America but currently, aside from draw hunts and a very small area in the Dalton Highway Corridor, there is no archery season or area for those wishing to pursue sheep with bow and arrow. Having bow hunted for many years in Alaska, I can attest that having a season, even just a few days, would provide a great amount of enjoyment and adventure for many hunters with essentially zero negative impact on other hunters or the sheep population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed this idea with several biologists at ADF&G and all of them felt that this proposal would have no adverse effect on our declining sheep population but would increase hunting opportunity,

PROPOSED BY: Paul Forward (EG-F24-097)

King Salmon Area – Units 9 & 10

PROPOSAL 5

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

Reduce the nonresident bag limit for caribou in Unit 9D from two bull caribou to one as follows:

Unit 9D. Nonresidents limited to one bull caribou by harvest ticket.

What is the issue you would like the board to address and why? Abuse of the liberal bag limits on bull caribou for nonresident hunters in Unit 9D. The current bag limit is two bulls per regulatory year. This is one of, if not the only, unit in Alaska that still allows nonresidents to take two bulls. The area was just opened up eight years ago after a long closure due to low numbers. Then shortly after opening back up to allow nonresidents to take two bulls seems out of line with the situation and herd. Some guides on state land are taking many hunters and allowing them to take two bulls, which is an abuse of the limited resource. The herd is healthy and trophy quality is good and can withstand sustainable harvest of the mature bulls, but not at the current two bag limit.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Developed in coordination with Unit 9 game biologists in King Salmon along with other commercial use operators in the area.

PROPOSAL 6

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

Shorten the nonresident hunting season for caribou in Unit 9D as follows:

Unit 9D, nonresident season: Sept. 1-30 by harvest ticket.

What is the issue you would like the board to address and why? Abuse of the liberal seasons on bull caribou for nonresident hunters in Unit 9D. The current season for nonresidents is August 1-September 30. August is a difficult time to keep meat and keep the bugs and heat from spoiling it. Also, hides and antlers in velvet are not prime at this time and also hard to keep from spoiling in these warmer conditions. Additionally, this long season in combination with the limit of two bulls is not sustainable long term. The area was closed for many years and just opened up eight years ago. Then shortly after opening back up, they developed this long season that seems out of line with the situation and herd. The herd is currently healthy and can withstand sustainable harvest of the mature bulls, but not at the current rate.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 7

5 AAC 85.025(4). Hunting seasons and bag limits for caribou.

Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents as follows:

	Resident		
	Open Season		
	(Subsistence and	Nonresident	
Units and Bag Limits	General Hunts)	Open Season	

(4)

Unit 9(D)

If the harvestable portion is

99 caribou or less:

RESIDENT HUNTERS: Aug. 1–Sept. 30
1 caribou by Tier II (Subsistence hunt only)

subsistence hunting Nov. 15–Mar. 31

permit only; (Subsistence hunt only)

NONRESIDENT HUNTERS: No open season

If the harvestable portion is greater than 99,

but less than 151 caribou:

RESIDENT HUNTERS: Aug. 1–Sept. 30 1 caribou by registration Nov. 15–Mar. 31

permit only

NONRESIDENT HUNTERS: No open season

If the harvestable portion is greater than 150, but less than 251 caribou:

RESIDENT HUNTERS: Aug. 1–Oct. 21
2 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS:

2 bulls <u>Aug. 1–Oct. 21</u> [AUG. 1–SEPT. 30]

If the harvestable portion is greater than 250, but less than 451 caribou:

RESIDENT HUNTERS: Aug. 1–Oct. 21
3 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS:

2 bulls <u>Aug. 1–Oct. 21</u> [AUG. 1–SEPT. 30]

If the harvestable portion is greater than 450, but less than 551 caribou:

RESIDENT HUNTERS: Aug. 1–Oct. 21
4 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS: Aug. 1–Oct. 21
[AUG. 1–SEPT. 30]

2 bulls

If the harvestable portion is great than 550:

RESIDENT HUNTERS: Aug. 1–Oct. 21
5 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS:

2 bulls <u>Aug. 1–Oct. 21</u>
[AUG. 1–SEPT. 30]

• • •

What is the issue you would like the board to address and why? The Southern Alaska Peninsula caribou herd has been showing an increasing population trend with high calf:cow ratios and bull:cow ratios that meet objectives. Currently, the population estimate is around 4,300, with a population objective of 1,500–4,000. To change the trajectory of herd growth and decrease the possibility of the herd crashing, a tiered harvest structure was passed by the Board of Game in 2022. Due to the remoteness of Unit 9D, complicated transportation logistics, and often difficult weather, harvest levels are well below sustainable harvest thresholds and increased harvest is recommended. Nonresident bull caribou harvest exceeded resident harvest in 2018 and has steadily

increased to 64 bull caribou harvested this last season while resident harvest remained steady around 25 caribou harvested each year since 2017 (Figure 1-1).

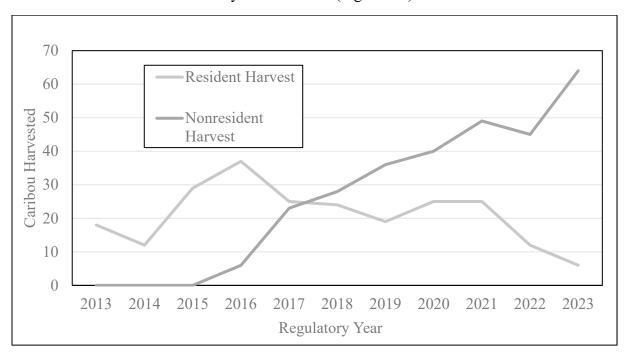


Figure 7.1. Caribou harvested by residents and nonresidents for the Southern Alaska Peninsula caribou herd.

The number of nonresidents that hunted surpassed resident hunter numbers in 2021 and it appears there is a greater interest in hunting this area by nonresidents than residents. Increasing season dates through the fall brown bear season has the potential to allow for additional caribou to be taken which will aid in keeping the herd within objectives.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 8

5 AAC 92.990(a)(21). Definitions.

Clarify that hunting feral reindeer in Unit 10, Umnak Island, is allowed under the current caribou hunting regulations as follows:

We are seeking clarification that reindeer hunting is currently allowed on Umnak Island under current regulations. If that is not the Board of Game's determination, then we are seeking to declare an open season through the deleterious exotic wildlife regulations. The intent is to provide harvest opportunity on the herd, and to develop an economically viable business opportunity for the

Chaluka Corporation. We can provide further input on suggested seasons, bag, and possession limits, etc. We would also recommend that the regulations note the need to respect the land ownership rights of each corporation, and that hunters contact the appropriate corporation to seek permission prior to accessing their land.

What is the issue you would like the board to address and why? Reindeer were introduced to Umnak Island in 1923 for the benefit of island residents. The herd size is now estimated at over 5,000 animals following an aerial survey conducted in 2022.

In reviewing the hunting regulations, it appears the best regulatory comparison is to that of Kodiak Island, where hunting feral reindeer existed with no limits and no closed season until roughly 2008, when the Board of Game adopted a new proposal to implement a hunting season of August 1 – January 31, with a limit of one bull per season. This was done out of a conservation concern. No such Board of Game proposals or regulations exist for Umnak Island.

We are seeking clarification regarding the regulations that should apply to feral reindeer on Umnak, and confirmation that hunting feral reindeer is allowable under current regulations.

Umnak Island is located in the Aleutians about 900 miles from Anchorage. The island is divided into a patchwork quilt of roughly eight landowners, including Chaluka Corporation (Nikolski), the U.S. wildlife refuge, St. George Tanaq Corporation (St. George) and TDX Corporation (St. Paul). There is also a cattle ranch which has operated on leased land, as well as some military land too. The only residents on the island live in Nikolski.

There is a history of reindeer ownership on Umnak Island which pre-dates ANCSA. Our understanding is that sometime after ANCSA in 1971, two Alaska Native Corporations applied for and reportedly acquired ownership of reindeer on the island. However, the herd has since spread throughout the Island and established itself elsewhere, including heavy concentrations of animals on land more than 25 miles away which is owned by the Chaluka Corporation (village corporation with land holding near Nikolski). Local residents, a key landowner (Chaluka Corporation) and tribal leadership have advised that there have been no efforts to manage the herd for at least 25 years.

The herd is now considered a nuisance and a habitat/conservation risk by local residents given its size and the risk of overgrazing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We have developed this proposal with some guidance from the Department of Fish and Game.

PROPOSAL 9

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

Lengthen the spring and fall brown bear hunting seasons in Unit 9 as follows:

Reinstate the previous season dates of a 21-day season for both spring a fall hunts on alternating years.

Season dates for even years 2026, 2028.... 5/10-5/31 and odd years 2025, 2027... 10/1-10/21.

This will help alleviate the compressed air travel schedule, allow local residents the opportunity to make more revenue and allow hunters more time to be more selective on the trophy they pursue.

What is the issue you would like the board to address and why? Season length for brown bears in Unit 9. While state website statistics are not complete, however a trend showing an increase of harvest of sows is up. This trend does not show a healthy population trend moving forward. With the shortening of the season more pressure is placed upon hunters that are going for once in a lifetime hunt to fill their tag and are more likely to shoot a legal bear instead of genetically selecting a mature boar that doesn't harm the overall population like a sow does. Since the season change, sow harvest has gone up 11% to 1/3 of the overall take.

An equal however different issue with the short season is the strain and safety issues it creates with an equal number of hunters in a compressed season does on all logistical operations. The number of flights and need for qualified pilots to get personnel, supplies and fuel to one of the most remote areas of Alaska in and out of the field cannot keep up with demand.

Subsequently the revenue generated for these remote villages and business has been impacted as well with only a two-week window for residents that stand to make money to help live in an expensive and logistically challenging portion of our great state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? N/A.

PROPOSAL 10

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

Close Unit 9A to nonresident brown bear hunting as follows:

Close Game Management Subunit 9A to brown bear hunting by nonresidents (currently designated as registration permit hunts RB368 and RB370).

What is the issue you would like the board to address and why? The brown bear population in the small portion of Unit 9A open to hunting is under likely significant hunting pressure. The

Unit 9A hunting season should be closed to nonresidents in all regulatory years, odd and even, to protect that resource while still providing opportunity to residents.

Available ADF&G data on the number of permittees who reported hunting indicates increasing hunting pressure RY2011-RY2017 in Unit 9A, though it is decreasing in Unit 9 as a whole. Contrary to Unit 9 as a whole, Unit 9A reported brown bear kills have been increasing RY2011-RY2017. ADF&G has conducted no Unit 9A brown bear population or density surveys in recent decades.

In Unit 9A the number of permittees who reported hunting in RY2017 was substantially higher, an increase of 173.4% over those who reported hunting in Unit 9A in RY2011. Similarly, and also contrary to Unit 9 as a whole, Unit 9A reported harvest in RY2017 was substantially higher, up 157.5% from the RY2011 reported harvest.

Recent percentages of Unit 9A resident permittees range from 6-15% of the total Unit 9A permittees who reported hunting.

More analysis and information will be provided in proposal commentary if more data and reports are made available by ADF&G. No published summary harvest data is yet available from the fall 2023 hunt and the spring 2024 hunt will occur well after the deadline for these proposals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Wayne Hall (EG-F24-050)

PROPOSAL 11

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

Shorten the spring and fall brown bear hunting seasons in Unit 9C by one week for residents and nonresidents as follows:

I request that the Board of Game shorten the brown bear hunting season by one week (back to its previous length) in both the spring and the fall for Unit 9C, re-establishing the season as October 7–21 and May 10–25 respectively.

Shortening the season allows for the last of the other user groups to exit the popular rivers and lakes where hunting takes place.

In the Department of Fish and Game's 2022 comments, they wrote that "The department and Board of Game have for decades supported short seasons and reduced bag limits for nonresident and resident hunters in Unit 9 for bear conservation and hunt quality. The management objective for bears in all of Unit 9 is to maintain a high bear density with a sex and age structure that will sustain

a harvest composed of 60% males, with 50 males 8 years or older taken during the combined fall and spring seasons. "

Also, at issue is whether it is ethical to sport hunt animals that are habituated to humans. The bears hunted on Moraine, Funnel and Kulik Rivers are known worldwide. Photographers, film crews and other visitors pay thousands of dollars a day to view and photograph these bears. They are used to the presence of humans: sows will nurse their cubs next to fishermen and wildlife viewers. Many of the bears are known individually by guides and visitors alike. Much of the visiting public is unaware that these bears will be hunted later in the season.

What is the issue you would like the board to address and why? In 2022, the Board of Game adopted a proposal to increase brown bear fall and spring seasons in Unit 19C by one week each, allowing hunters to hunt earlier in the fall and later spring. In the passing of that proposal, the board extended the brown bear seasons to October 1-21 and May 10-31.

In the 35 years I've lived in Alaska I have worked as a resource manager for three different land management agencies, including Alaska State Parks. For 16 of those years, I was a law enforcement officer; part of my job was dealing with user conflicts, human-wildlife conflicts, enforcing Alaska game regulations and public safety. What I observed with this early season hunt was the potential for major user conflicts and public safety issues.

- User conflicts- Several operators were still dropping off sport fisherman and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitat where bears were fishing, forcing other users to avoid these areas.
- **Public Safety** Bears were being shot right at the outlet of the Kulik River. The Kulik Lodge still has employees breaking down camp, there were several groups of sport fisherman on the river as well as wildlife viewers. A bear had cached a hunter shot carcass right at the outlet of the Kulik River where aircraft picked up sportfisherman and other visitors.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed addressing this early season hunt with other guides and businesses that use this area for sport fishing and bear viewing. I am a member of Katmai Service providers.

PROPOSAL 12

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

Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents as follows:

Units 9D and 9E: Both residents and nonresidents, October 1-21: 1 bear every four regulatory years by registration permit RB368

What is the issue you would like the board to address and why? The shortened fall season for brown bear for nonresidents in Units 9D & 9E. Several years ago, due to guide conflict in Unit 9B and 9C, a proposal was passed to limit the harvest of bears in those subunits due to user conflict and perceived abuse of the resource. Units 9D and 9E were not at all affected by this user conflict and issue. However, the proposal was passed to shorten the seasons for all of Unit 9 from October 1-21 to October 7-21. This cut the first six days of the season and shortened it from 21 days to 15 days. The first six days of October are much better weather and more favorable hunting conditions for large mature boars than the end of the season. Additionally, the weather in Units 9D and 9E can be downright terrible later in October and make it difficult to hunt and even more difficult for outfitters to operate safely, and even more difficult to get home at the end of the season.

Then last year, those same "upper" Unit 9 subunits that had the issues that caused the shortening of the season, successfully proposed to extend their seasons. Unit 9A and 9C to October 1-21 and Unit 9B September 20-21, while Units 9D and 9E were left unchanged at our October 7 start date. Consultation with the Unit 9 biologist in King Salmon confirmed the bear population in Units 9D and 9E is healthy and consistent with the other subunits. Also confirmed the harvest statistics are similar in all Unit 9 subunits for ratio of male/female harvest. This indicates that there is no statistical evidence to suggest a limited season for these two subunits when the other subunits have a longer season.

A shift in the season dates would not increase the number of hunters in the field. It will simply increase hunter experience and harvest of mature boars, which is already determined to be a sustainable practice. It will also be adding additional safety factor for operators that is more aligned with other subunits and the current weather patterns.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? In coordination with other outfitters in Units 9D and 9E as well as consultation and insight from the Unit 9 biologist.

PROPOSED BY: Jordan Wallace and Dave Leonard (EG-F24-049)

PROPOSAL 13

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

Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents, and lengthen the nonresident spring season as follows:

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

Units 9D and 9E

One bear every four regulatory years by permit available online at http://hunt.alaska.gov and in person in King Salmon beginning July 5, RB368, both residents and nonresidents, **October 1 - October 21** [OCT 7- OCT 21].

One bear every four regulatory years by permit available online at http://hunt alaska.gov and in person in King Salmon beginning April 2, RB370, residents, May 10 - May 31. Nonresidents, May 10 - May 31 [MAY 10 - MAY 25].

What is the issue you would like the board to address and why? Hunting seasons and bag limits for brown bear.

I recommend restoring the brown bear seasons to what they were prior to 2018 when they were shortened. At the 2018 Dillingham meeting, the seasons were shortened by six days each, spring and fall. They are presently May 10 - May 25th for nonresidents for the even years, and October 7th to October 21st for residents and nonresidents in the odd years. The winter of 2011-12 was devastating to the brown bears in these Units. During this winter, in my estimation, we lost 50 to 75% of our young bears and sows; the older boars seemed to have made it through the winter in good shape. This was reflected in the skull size of harvested bears. The season was shortened to reduce the harvest of sows until the population had recovered. It has been 12 years, and we are seeing many more sows with cubs and young bears these days. I believe they have recovered enough to restore these seasons back to their prior lengths.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I spoke with some other guides who guide in these areas and they were in agreement.

PROPOSAL 14

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

Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents as follows:

Change the brown bear season in Units 9E and 9D to October 1st to Oct 21st of odd number years for residents and nonresidents.

What is the issue you would like the board to address and why? The start brown bear season in Unit 9 was changed from October 1st to October 7th of odd numbered years a few years ago. I would like for the season to start on October 1st again. The bear population is doing great with a diverse age class of bears. There was concern after the late winter/spring of 2012 that some sows and cubs were lost. The population has rebounded, and we are seeing a very diverse age class of bears.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 15

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

Lengthen the nonresident, spring brown bear hunting seasons in Units 9D and 9E as follows:

Units 9D and 9E. Nonresident season May 10-31. One bear every four regulatory years by registration permit, RB370.

What is the issue you would like the board to address and why? The shortened spring season for brown bear for nonresidents in Units 9D and 9E. Several years ago, due to guide conflict in Unit 9B and 9C, a proposal was passed to limit the harvest of bears in those subunits due to user conflict and perceived abuse of the resource. Units 9D and 9E were not at all affected by this user conflict and issue. However, the proposal was passed to shorten the seasons for all of Unit 9 from May 10-31 to May 10-25. This cut the last six days of the season and shortened it from 22 days to 16 days. This drastically cut valuable hunting time away from nonresident hunters and placed undue stress and demand on the outfitters to conduct the hunts in a shorter amount of time. Any weather delay or bad winds, which are increasingly common, cuts precious days off a hunters' time. Additionally, the last week of May can be an excellent time for harvesting large mature boars and the weather is getting better and safer to operate. Furthermore, any chance of a "late spring" where bear activity is less early on due to larger snow years and other factors, causes the last week of May to be even more valuable for hunter harvest and success of large mature boars. Then last year, those same units 9B and C that had the issues that caused the shortening of the season, successfully proposed to extend the season back to May 10-31, but Units 9D and 9E were left unchanged at our 16 days.

Consultation with the Unit 9 biologist in King Salmon confirmed the bear population in Unit 9D and 9E is healthy and consistent with the other subunits. Also confirmed the harvest statistics are similar in all Unit 9 subunits for ratio of male/female harvest. This indicates that there is no statistical evidence to suggest a limited season for these two subunits when the other subunits have a longer season.

A longer season would not increase the number of hunters in the field. It will simply increase hunter experience and harvest of mature boars, which is already determined to be a sustainable practice. It will also be adding additional safety factors for operators.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? In coordination with outfitters in Units 9D and 9E. as well as consultation and insight from the Until 9 biologists.

PROPOSAL 16

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

Lengthen the fall brown bear hunting seasons for in Units 9D and 9E for residents and nonresidents as follows:

5 AAC 85.020(18) Unit 9D and 9E Brown/Grizzly Bear.

Brown/Grizzly Bear for both residents and nonresidents in Unit 9D and 9E.

One bear every 4 regulatory years by permit available online at http://hunt.alaska.gov and in person in King Salmon beginning July 5.

Open Season: October 1 [October 7] – October 21.

If nothing is done, the brown/grizzly bear hunting opportunity in Unit 9D and 9E will continue to be underutilized with only a 14-day season.

What is the issue you would like the board to address and why? Lengthen the registration RB368 fall hunting season for brown/grizzly bears in Units 9D and 9E to October 1-21. This would then align all of Units 9A, C, D and E RB368 registration hunts. Currently the season is October 7-21 in Units 9D and 9E and October 1-21 in Units 9A and C.

I believe the intent of shortening the season last cycle was to lessen the overall harvest of brown bears. Currently, there is no shortage of brown bears in Units 9D and E. The brown bear population appears to be healthy and on the rise with a diverse age class of brown bears. On a side note, having the season start earlier will thus create a safer hunting experience. Throughout the fall the days get shorter, and the weather patterns worsen. Hunters going afield or returning are constantly negotiating a travel window and that window gets smaller every day throughout the October season. Allowing hunters into the field a week earlier will facilitate the daylight and weather window easier.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSAL 17

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

Lengthen the spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents as follows:

Change the brown bear hunting seasons in Unit 9E, for both resident and nonresident hunters, (RB368) and (RB370). Lengthen the bear season to mirror Units 9A & C.

Unit 9E (RB 368) brown bear season date: Oct. 1 - Oct. 21, [Oct. 7 to Oct. 21] odd number years.

(RB 370) brown bear season date: May 10 - May 31, [May 10- May 25] even number years.

What is the issue you would like the board to address and why? Change the brown bear hunting seasons in Unit 9E, for both **resident and nonresident hunters**, (RB 368) and (RB370). Lengthen the bear season to mirror Units 9A and C.

The brown bear population in Unit 9E has been increasing for the last eight - ten years. Sows are routinely birthing three - four cubs, per litter, (personal observation).

The Alaska Department of Fish and Game's plan, to help the population of the Northern Alaska Peninsula grow, is as follows:

- **5 AAC 92.111. Intensive Management Plans I.** Northern Alaska Peninsula (NAP) Caribou Herd Intensive Management Plan, in unit 9(C) and 9(E)
- (2) Caribou, brown bear and wolf objectives are as follows:
- (D) the brown bear population objectives for Unit 9 is to maintain a high density bear population with a sex and age structure that can sustain a harvest composed of 60 percent males, with 50 males eight years of age or older during combined fall and spring season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have been guiding hunters every year on the Alaska Peninsula since 1978. I spend an average of 120 days per year in Unit 9E, guiding hunters and fisherman.

PROPOSAL 18

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

Shorten the spring and fall brown bear hunting seasons in Unit 9C for residents and nonresidents, and convert to drawing permits hunts as follows:

Unit 9C: Restore brown bear hunting season to October 7-21 (from October 1-21) and May 10-25 (from May 10-31), and establish 1 bear every four years by drawing permit only.

ISSUE: The current regulation for Unit 9C establishes an October 1 to October 21 (odd years only) and May 10 - May 31 (even year only) season for brown bear hunting. Part of Unit 9C includes Katmai National Preserve and the Funnel, Moraine, and Battle Creek drainages. While hunting is permitted within national preserves under the Alaska National Interest Lands Conservation Act (ANILCA) of 1980, the act also directed that the National Park Service provide for "high concentrations of brown/grizzly bears and their denning areas" in Katmai National Park and Preserve. Bear viewing guides in this area have reported a decline in the number of bears, most notably trophy class mature males, observed by their clients.

While there may be multiple factors causing the viewable number of bears to decline, we don't know for sure the full range of the causes. Recent population data and harvest analysis has not been provided by the National Park Service or ADF&G to support the extended hunting season in Unit 9C, Uniform Coding Units (UCU) 702 and 703.

My concern is the high probability that too many Katmai Preserve bears are being harvested to meet the congressional mandate in ANILCA of providing for "high concentrations" of brown bears. In addition, the impact of this harvest on the age distribution, as well as the overall populations numbers, is at odds with the National Park Organic Act and with direction in Chapter Four of the National Park Management Policies that, in part, directs the Park Service to "strive to understand, maintain, restore and protect the inherent integrity of the natural resources...". To support a sustainable bear harvest in Unit 9C that also meets the Park Service mandate, a reliable study needs to be done on bear populations, including age classes.

The National Park Service and the State of Alaska need to collaborate to determine what level of harvest can occur in Katmai Preserve and still meet the federal mandate of "high concentrations" of brown bears. Once a harvest level is determined, we request that the department adopt a draw hunt to ensure that only a sustainable harvest is taken each year.

Will the quality of the resources harvested or the products produced be improved? It improves the quality of the bear viewing resource by reducing the overharvest of brown bears. This will also, eventually, improve the quality of the hunting in this area as only a few bears will be harvested each year and those bears will undoubtedly be trophy sized.

Who is likely to benefit? The bear population will increase, particularly large mature males. The National Park Service will benefit from being able to meet its congressional mandate. The State of Alaska will benefit by being seen as partnering with the federal government on how to sustain a hunt in an area with a specific population directive from Congress. Those hunters that are eventually allowed back into this area will benefit from trophy size bears. Visitors and residents alike will benefit by the return to historic brown bear population numbers giving unsurpassed brown bear viewing experiences found nowhere else in the world. The opportunity to view bears will continue to be an economic benefit to gateway communities on the Kenai Peninsula, Anchorage, and Kodiak.

Who is likely to suffer? A small number of hunters will not be able to hunt bears in this area. There is some economic loss from air transport and guide services.

Other solutions considered? Restore hunting season to October 7-21 and May 10-25, and establish drawing permit for that portion of Unit 9C in Katmai Preserve; namely, UCU 702 and UCU 703.

What will happen if nothing if done? There will continue to be harvested levels of brown bears that conflict with the National Park Organic Act and other federal laws, including the mandate found in ANILCA to provide for "high concentrations" of brown bears. Not only will this

continued violation of federal law exacerbate state/federal tensions over jurisdiction, but continued hunting without reliable population data will contribute to the depletion of brown bears in Katmai National Park and Preserve. Observations by bear viewing operators in the immediate area in Katmai Preserve have recently noted a decline in number of large mature male bears.

At risk here is one of the world's premier brown bear viewing areas. Because of the lack of vegetation, this area provides a unique opportunity to observe brown bears in their natural habitat. These bears become habituated to human observation and the result is bear viewing unlike anywhere else in the world. This is exemplified by the volume of people that utilize bear viewing guides each summer and pay significant money to observe these bears. The close proximity of these bears to Alaska's major population centers have created a unique bear viewing opportunity that provides jobs and a good source of income to bear viewing guides living on the Kenai Peninsula, King Salmon, and Kodiak.

A study by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in Southcentral Alaska, stated that bear viewing related service providers (air/boat taxis, guides, lodging) reported \$34.5 million in sales in 2017 and that bear viewing service providers paid approximately \$10 million in direct wages and benefits and hired 371 employees in 2017. Direct spending by service providers and households contributes approximately \$19 million in value added to the regional economy. This sustainable economic activity is at risk, as well as the educational and inspirational opportunities provided by this unique bear viewing experience.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No Advisory Committee or others were involved.

PROPOSAL 19

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10 as follows:

Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10. Establishing a hunting season will prevent Pribilof foxes from being hunted during their breeding season. The rationale behind suggesting a bag limit only for nonresidents is to avoid undue hardship for residents living on the Pribilof Islands who may seek to harvest foxes as a means of livelihood. (The majority of nonresident hunters to the Pribilofs are believed to be from out of state.)

Suggested draft regulatory language:

Hunting Regulations – Fur Animals

Arctic fox: Unit 10, Pribilof Islands located in a portion of Unit 10,

RESIDENT HUNTERS: No Limit, open season Nov 10 – Feb 28 [NO CLOSED SEASON].

NONRESIDENT HUNTERS: Two foxes [NO LIMIT], open season Nov 10 – Feb 28 [NO CLOSED SEASON].

This establishes an open season that does not overlap the fox breeding season, and is similar to the two fox bag limit for Arctic fox hunting in other units.

What is the issue you would like the board to address and why? Unit 10 includes the Pribilof Islands in the Bering Sea, in addition to the western and central Aleutian Islands from Attu Island to Unimak Island.

The Alaska Department of Fish and Game (2015) identifies the Arctic fox, Vulpes lagopus, as a Stewardship Species, a Sentinel Species, and a Species of Greatest Conservation Need (SGCN). Arctic fox on the Pribilof Islands, i.e., Pribilof foxes, are further recognized as an endemic subspecies, Vulpes lagopus pribilofensis (Angerbjörn et al. 2004; Norén et al. 2023) and are the islands' only terrestrial carnivore. There are no red fox (V. vulpes) on the Pribilof Islands.

Foxes (arctic and red) were historically introduced onto many Aleutian Islands (Bailey 1993) in Unit 10. Subsequently, introduced foxes have been successfully eradicated from many Aleutian Islands in Unit 10 through a USFWS removal program (Bailey 1993; Petersen et al. 2015). Possibly influenced by this history of past introductions and eradications of foxes on Aleutian Islands, the Alaska Hunting Regulations (2023-2024, and previous years) stipulate "No Limit" and "No Closed Season" for Arctic fox hunting throughout Unit 10.

Because the Pribilof Islands are designated as being in Unit 10, Pribilof foxes may be legally hunted with no bag limit and no closed season.

Why is this an issue?

On the Pribilof Islands, the lack of bag limits on the hunting of Arctic foxes could result in unsustainable levels of harvest. In particular, having "No Closed Season" allows for Pribilof foxes to be hunted throughout their breeding season. [In addition to hunting, the trapping of Arctic fox is permitted throughout Unit 10, including the Pribilofs, with "No Limit" during the open season.]

Pribilof foxes are part of the Pribilof Islands' native faunal and floral biodiversity (Elliott 1881). Pribilof foxes provide unique photo-tourism viewing opportunities, and serve as a first-line of defense against introduced rodents, i.e., rats, becoming established on the Pribilof Islands.

Pribilof fox populations appear to be in decline (Fig.1)(White 1992, 2017) as a result of reductions in natural food sources e.g., northern fur seals, nesting sea birds. Other factors, including decreasing sea ice (Geffen et al. 2007), exposure to organochlorine contaminants (Bolton et al. 2017), and disease (White 2010; Spraker and White 2016) may be further contributing to the observed decline in Pribilof fox numbers.

Compared to historic population estimates of >250 breeding pairs on each of St. Paul and St. George Islands (Jones 1914; Isto 2012), Pribilof foxes currently exist in low numbers. A

standardized island-wide survey last conducted in July 2023 on St. Paul documented a total of 57 active dens, 34 of which appeared to be natal (although pups were observed at only 26 dens).

What would happen if nothing is changed?

Unlimited hunting, especially during the fox breeding season, is likely to be detrimental to the long-term conservation and survival of endemic Pribilof foxes. As small, genetically-isolated populations, Pribilof foxes are vulnerable to a myriad of natural and anthropogenic threats, as noted above. A combination of factors, including climate change, and future and emergent threats such as increasing risk of disease e.g., avian flu, could drive Pribilof foxes towards extinction.

In the short-term, unlimited harvest reduces opportunities for tourism viewing, and reduces the fox populations' capacity to prevent introduced rodents from becoming established on the Pribilof Islands.

The local St. Paul Island Ecosystem Conservation Office (ECO) informally oversees resident hunting. However, an unknown number of nonresidents who travel to the Pribilof Islands specifically to hunt (primarily sea ducks and reindeer) also harvest Pribilof foxes. The lack of available data on nonresident fox harvest, and the current regulations that allow for "No Closed Season" and "No Limit" on Arctic fox hunting throughout Unit 10, hampers ECO's ability to effectively monitor or conserve the Pribilof Island's natural resources.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. While there are concerns about the lack of monitoring of visiting hunters who harvest local wildlife (Pribilof foxes, sea ducks), overall, the Tribal Council was not in consensus as to whether the proposed changes would address concerns about fox conservation without interfering with local activities e.g., fox hunting, control of "nuisance" animals in town.

The Tribal Council supports the concept of ECO establishing a local monitoring program of all on-island hunting to obtain harvest data that can help inform local conservation programs, similar to ECO's established and successful reindeer hunt monitoring program. However, in the absence of both a monitoring program and any local enforcement authority, the Tribal Council expressed doubt as to how the proposed regulatory changes could be reasonably enforced.

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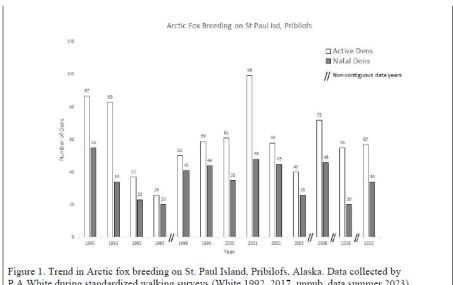
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Continued on next page.



P.A. White during standardized walking surveys (White 1992, 2017, unpub. data summer 2023).

PROPOSED BY: Paula White, PhD ****************************

(HQ-F24-034)

PROPOSAL 20

5 AAC 84.270. Furbearer trapping.

Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10 as follows:

Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10. The rationale behind suggesting a bag limit only for nonresidents is to avoid undue hardship for residents living on the Pribilof Islands who may seek to harvest Arctic foxes as a means of livelihood.

There already exists an open season for Arctic fox trapping throughout Unit 10. There are no changes proposed to the existing open season dates. There are no changes proposed for bag limits on resident trapping.

Suggested draft regulatory language:

Trapping Regulations – Central/Southwest Alaska, Units 9-11, 13, 14A, 14B, 16, and 17

Arctic fox: Unit 10, Pribilof Islands located in a portion of Unit 10

RESIDENT TRAPPERS: Nov 10 – Feb 28..... No Limit.

NONRESIDENT TRAPPERS: Nov 10 – Feb 28..... **Two foxes** [NO LIMIT].

What is the issue you would like the board to address and why? Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands which are located in a portion of Unit 10 as follows:

NONRESIDENT TRAPPERS: BAG LIMIT 2 FOXES

Unit 10 includes the Pribilof Islands in the Bering Sea, in addition to the western and central Aleutian Islands from Attu Island to Unimak Island.

The Alaska Department of Fish and Game (2015) identifies the Arctic fox, Vulpes lagopus, as a Stewardship Species, a Sentinel Species, and a Species of Greatest Conservation Need (SGCN). Arctic fox on the Pribilof Islands, i.e., Pribilof foxes, are further recognized as an endemic subspecies, Vulpes lagopus pribilofensis (Angerbjörn et al. 2004; Norén et al. 2023) and are the islands' only terrestrial carnivore. There are no red fox (V. vulpes) on the Pribilof Islands.

Foxes (arctic and red) were historically introduced onto many Aleutian Islands (Bailey 1993) in Unit 10. Subsequently, introduced foxes have been successfully eradicated from many Aleutian Islands in Unit 10 through a USFWS removal program (Bailey 1993; Petersen et al. 2015). Possibly influenced by this history of past introductions and eradications of foxes on Aleutian Islands, the Alaska Trapping Regulations (2023-2024, and previous years) stipulate "No Limit" for Arctic fox trapping during the open season (Nov 10 – Feb 29) throughout Unit 10.

Because the Pribilof Islands are designated as being in Unit 10, Pribilof foxes may be legally trapped (including shot) with no bag limit during the open season.

Why is this an issue?

On the Pribilof Islands, the lack of bag limits on the trapping of Arctic foxes could result in unsustainable levels of harvest. [In addition to trapping, the hunting of Arctic fox is currently permitted throughout Unit 10, including the Pribilofs, with "No Limit" and "No Closed Season".]

Pribilof foxes are part of the Pribilof Islands' native faunal and floral biodiversity (Elliott 1881). Pribilof foxes provide unique photo-tourism viewing opportunities, and serve as a first-line of defense against introduced rodents, i.e., rats, becoming established on the Pribilof Islands.

Pribilof fox populations appear to be in decline (Fig.1) (White 1992, 2017) as a result of reductions in natural food sources e.g., northern fur seals, nesting sea birds. Other factors, including decreasing sea ice (Geffen et al. 2007), exposure to organochlorine contaminants (Bolton et al. 2017), and disease (White 2010; Spraker and White 2016) may be further contributing to the observed decline in Pribilof fox numbers.

Compared to historic population estimates of >250 breeding pairs on each of St. Paul and St. George Islands (Jones 1914; Isto 2012), Pribilof foxes currently exist in low numbers. A standardized island-wide survey last conducted in July 2023 on St. Paul documented a total of 43 active dens, 26 of which were confirmed as natal (one or more surviving pups present).

What would happen if nothing is changed?

Unlimited trapping is likely to be detrimental to the long-term conservation and survival of endemic Pribilof foxes. As small, genetically-isolated populations, Pribilof foxes are vulnerable to a myriad of natural and anthropogenic threats, as noted above. A combination of factors, including climate change, and future and emergent threats such as increasing risk of disease e.g., avian flu, could drive Pribilof foxes towards extinction.

In the short-term, unlimited harvest reduces opportunities for tourism viewing, and reduces the fox populations' capacity to prevent introduced rodents from becoming established on the Pribilof Islands.

The local St. Paul Island Ecosystem Conservation Office (ECO) informally oversees resident trapping. However, an unknown number of nonresidents who travel to the Pribilof Islands specifically to hunt (primarily sea ducks and reindeer) also 'trap' Pribilof foxes (legally by shooting). The lack of data on nonresident fox harvest, and current regulations that allow for "No Limit" on Arctic fox trapping throughout Unit 10, hampers ECO's ability to monitor or effectively conserve the Pribilof Island's natural resources.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. While there are concerns about the lack of monitoring of visiting hunters who harvest local wildlife (Pribilof foxes, sea ducks), including visitors who may legally shoot foxes under a trapping license, overall, the Tribal Council was not in consensus as to whether the proposed changes would address concerns about fox conservation without interfering with local activities e.g., local fox trapping. [The proposed changes do not apply to resident trappers.]

The Tribal Council supports the concept of ECO establishing a local monitoring program of all on-island hunting/trapping to obtain harvest data that can help inform local conservation programs, similar to ECO's established and successful reindeer hunt monitoring program. However, in the absence of both a monitoring program and any local enforcement authority, the Tribal Council expressed doubt as to how the proposed regulatory changes could be reasonably enforced.

(See references provided in corresponding proposal to establish a hunting season and nonresident bag limit.)

PROPOSED BY: Paula White, PhD (HQ-F24-035)

PROPOSAL 21

5 AAC 84.270 Furbearer trapping.

Remove the two per day bag limit for beaver when taken by firearm during April 15–May 31 in Unit 9 as follows:

Species and Units Open Season Bag Limit

(1) Beaver

. . .

Unit 9[, FIREARMS MAY BE USED TO TAKE UP TO 2 BEAVER PER DAY FROM APR. 15–MAY31] Oct 10–May 31 No limit.

. . . .

What is the issue you would like the board to address and why? Unit 9 currently has no bag limit for beaver under trapping and hunting regulations and no closed season under hunting regulations so having a limit under trapping regulations for beaver taken by firearm is unreasonably more restrictive. Anyone with a hunting license can take an unlimited number of beavers with a firearm during that time period in Unit 9. Beaver populations are healthy and are found in the majority of drainages where there is suitable habitat in Unit 9 and there are no conservation concerns.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 22

5 AAC 85.057. Hunting seasons and bag limits for wolverine.

Shorten the season for hunting wolverine in Unit 9 for both residents and nonresidents as follows:

September 1 through **February 28** [March 31].

What is the issue you would like the board to address and why? Shorten the season dates for wolverine hunting in Unit 9.

Wolverine enter the breeding stage during late February and are in full swing by March with activity increasing drastically which makes them easy targets for hunting with a rifle on a snowmachine. Considering they only reproduce two - three kits per year and often fail to reproduce I believe the hunting season should coincide with the closure of trapping on February 28. This would give them the best chance at reproduction.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this solution on my own and from personal experience in the area. I have trapped and hunted in this area for over 35 years and do not see how killing breeding wolverines allows a future in which we will be able to harvest them. Wolverines are now on the endangered species list in the lower 48.

Note: Game Management Unit 8 is outside the scope of the Central Southwest Region meeting.

PROPOSAL 23

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

Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresident hunters as follows:

Oct. 8 - Jan. 22 NONRESIDENT HUNTERS: 1 goose by drawing permit only; up to <u>150</u> [25] permits may be issued in combination with Unit 9, that portion within the Izembek State Game Refuge.

Oct. 16 <u>— Dec. 16</u> [Oct. 31] NONRESIDENT HUNTERS: 1 goose by drawing permit only; up to <u>150</u> [25] permits may be issued in combination with Units 8, the remainder of Unit 9, and 10 Unit 9, remainder.

Sept. 1 - Dec. 16 NONRESIDENT HUNTERS: 1 goose by drawing permit only; up to <u>150</u> [25] permits may be issued in combination with Units 8, that portion of Unit 9 within the Izembek State Game Refuge, and 10.

What is the issue you would like the board to address and why? Emperor goose fall-winter hunting has now been open for seven seasons. Residents may register for one permit to harvest up to a statewide total of 1,000 (liberal) or 500 (restrictive) geese harvested each season. Nonresidents have been allowed to hunt for the past six of those seven years and have been limited to 25 total tags allowed. Resident hunters have harvested fewer than 150 geese each season and participation appears to be declining among resident hunters. Meanwhile, nonresident interest has increased as demonstrated by a 200%+ increase in the numbers of nonresident hunters applying for DO508 permits - from 263 applicants for the 2018 season to 826 applicants for the 2024 season. Harvest data shows that resident hunters are not interested in hunting Emperor Geese - nonresidents are very interested. Nonresident hunts take place in November through January in rural areas and benefit local economies while not taking resource opportunities away from local Alaskans.

Did you develop your proposal in coordination with others, or with your local Fish and game Advisory Committee? No.

PROPOSAL 24

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

Close the season for Alaska hares in Units 9 and 17 as follows:

Resident Open Season (Subsistence and General Hunts) Nonresident Open Season

Units and Bag Limits

(2)

Snowshoe and Alaska hares

. . .

Units 9 and 17 Alaska hares
[ONLY 1 PER DAY, 4 TOTAL]

No open season [NOV. 1 – JAN. 31]

No open season
[NOV. 1 – JAN. 31]

What is the issue you would like the board to address and why? Alaska hare, one of two species of hare found in Alaska, are an endemic species that were once abundant in western coastal areas and their range extended from Cold Bay on the Alaska Peninsula north to Kotzebue on the Baldwin Peninsula (Units 9, 17, 18, 22, and 23). Historical accounts from the 1970's described a high abundance of Alaska hares often observed in groups ranging from 50-100 individuals. Recent research and anecdotal observations indicate the population is currently at historic lows for this species across their range, including in Units 9 and 17.

In 2018, in response to the sustained low abundance, a department project was initiated to develop survey methods for this elusive species to examine population dynamics and gain insight into Alaska hare movement ecology. Genetic fecal pellet surveys with hundreds of miles of transects were conducted from 2018-2022 in Units 9, 17, 18, 22, and 23 to gain a better understanding of Alaska hare distribution and abundance. Results from this work documented extremely low numbers of individual Alaska hares, especially in areas surveyed in Units 9, 17, and 23. Larger survey efforts in Units 22 and 23 yielded similar results with low abundances or complete absences from historical ranges that were last confirmed to have Alaska hares as recently as 2006.

Specific causes of this apparent decrease in abundance remain unknown. In response to the low abundance of Alaska hares, both the State Board of Game (Unit 9 in 2018; Units 18, 22, 23 in 2020 and Unit 17 in 2022) and the Federal Subsistence Board (Units 9, 17, 18, 22, and 23 in 2022) changed harvest regulations limiting harvest via bag limits, season restrictions, and salvage requirements.

Hunting seasons in Units 9 and 17 should be closed to address the low abundance and conservation concern for Alaska hare. Snowshoe hare hunting would remain open and unchanged in the area. A closed hunting season in the southern Alaska Peninsula may protect localized populations for quicker

recovery and recolonization. It remains unclear if human harvest is one of the factors preventing a recovery of the species but closing the hunting season is the first step in a conservation effort. Considering the extremely low abundances in this area eliminating the hunting season may be necessary to protect vulnerable Alaska hare populations.

There is a positive customary and traditional use finding for Alaska hares in Units 9 and 17. Any take is inconsistent with sustained yield and could jeopardize future harvest opportunity for subsistence and other harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Dillingham Area – Unit 17

PROPOSAL 25

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

Increase the number of moose drawing permits issued to nonresidents for Unit 17A as follows:

Allow for more nonresident draw tags to be issued. The management plans allows for a maximum of 50 nonresident tags. In 2023 only **six** moose were harvested from 20 tags issued in Unit 17A. With a healthy population that is 50% over the recommended population, allowing for another 30 tags would likely result in less than 10 more moose being harvested.

What is the issue you would like the board to address and why? ADF&G surveys in Unit 17A have identified an estimated 1,200 moose. Eight hundred moose is what the Department of Fish and Game has deemed to be the ideal highest population of moose in that area.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This has been a proposal I have come up with.

PROPOSAL 26

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

Lengthen the nonresident, fall noose hunt in Unit 17A as follows:

Allow nonresident hunting from September 1-20. The moose surveys have showed 1200 moose in an area that 800 animals was the top to the target range, according to the Togiak National Wildlife Refuge representative.

What is the issue you would like the board to address and why? An eleven-day hunting season in Unit 17A.

Did you develop your proposal with others, or with your local fish and game advisory committee? Developed proposal myself.

PROPOSAL 27

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

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

Resident
Open Season
(Subsistence and
General Hunts)

Nonresident Open Season

(15)

Unit 17(A)

Up to 2 moose per regulatory year only as follows:

RESIDENT HUNTERS:

Units and Bag Limits

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

. . .

1 antlerless moose by registration 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 the 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 in October 2022, the population

estimate was $1,967 \pm 358$ moose. After further analyses, this estimate will be corrected for sightability which will result in a higher population estimate further supporting liberal harvest strategies. The bag limit of two moose and antlerless harvest opportunity provide a mechanism to limit population growth and allow hunters to harvest surplus animals.

The moose population in subunit 17A is over objective 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.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 28

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

Reduce population and harvest objectives for moose in Unit 17B as follows:

Population	Finding	Population Objective	Harvest Objective
 Moose			
 GMU 17B	Positive	2,800–3,500 [4,900-6,000]	<u>100–250</u> [200-400]

What is the issue you would like the board to address and why? Current population objectives for moose in Unit 17B have never been met and harvest objectives have rarely been met. Robust moose population surveys across the Unit have been conducted by the department six times since 2000 but are challenging to complete due to the distance from Dillingham and poor survey conditions. Unit 17B is split into two survey units, 17B-West comprised of the Tikchik and upper Nushagak River watersheds, and 17B-East comprised of the Mulchatna watershed. Between 2000 and 2009, 17B-West was surveyed three times with an average population estimate of 1,183 (range of 1,137–1,210); 17B-East was surveyed twice with an average population estimate of 1,709 (range 1,466–1,953). Ideally, survey units are completed in consecutive years which occurred in 2000 and 2001 and 2008 and 2009. The combined estimates from 2000 and 2001 resulted in 3,155 moose, and from 2008 and 2009 resulted in an estimated combined 2,603 moose. Neighboring Unit 17C has similar moose habitat quality and quantity (~ 5,450 mi² moose habitat), a defined objective of 0.5 moose/mi² (~5,800 mi²), and a population objective of 2,800–3,500. Unit 17B population estimates from the robust surveys have never been documented within the existing lower population management objective of 4,900, nor the upper objective at 6,000.

Table 28-1. Unit 17B moose population estimates, regulatory year (RY) 2000–2009

Year	17B-West	17B-East	Total Estimate
2000	1,202	_*	
2001	_*	1,953	3,155
2005	1,210	_*	
2008	_*	1,466	
2009	1,137	_*	2,603

^{*}Survey not completed.

The reported annual harvest for Unit 17B over the last 40 years demonstrates that the minimum harvest objective has only been achieved in two independent years. The current harvest objectives for Unit 17B are not attainable due to a lack of resident hunter participation within the subunit and difficult access for nonlocal resident and nonresident hunters. The proposed new harvest objective for Unit 17B is 100–250 moose, which includes the 40-year average harvest of 121 moose, and also reflects the most recent harvest levels.

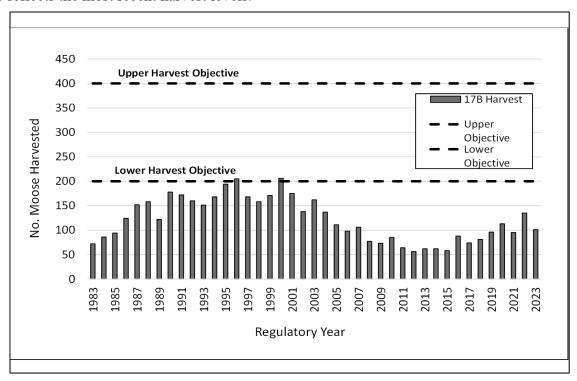


Figure 28-1. Unit 17B moose harvest RY1983–2023

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 29

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

Review the population and harvest objectives for the Mulchatna caribou herd as follows:

I recommend establishing new population and harvest objectives after a habitat assessment has been performed to determine the current ecological potential of the range to support caribou. Further, I recommend consideration of recent population and distribution data collected by state and federal Mulchatna caribou herd (MCH) managers that suggest that there are multiple, independent caribou populations within the designated range of the MCH.

Caribou Herds, Population Finding Population Harvest

Adak Negative

Beaver Mountain Negative

Central Arctic Positive 28,000 - 32,000 1,400 - 1,600

Chisana Negative

Delta Negative Denali Negative

Farewell/Big River Negative

Fortymile Positive 50,000 - 100,000 1,000 - 15,000

Galena Mountain Negative

Kenai Lowlands Negative

Kenai Mountains Negative

Killey River, Fox River, and Twin Lakes Negative

Macomb Positive 600 - 800 30 - 50

Mentasta Negative

Mulchatna Positive To be determined [30,000 – 80,000 2,400 – 8,000]

Nelchina Positive 35,000 - 40,000 3,000 - 6,000

Northern Alaska Peninsula Positive 6,000 - 15,000 600 - 1,500

Nushagak Peninsula Negative

Porcupine Positive 100,000 - 150,000 1,500 - 2,000

Rainy Pass Negative

Ray Mountain Negative

Southern Alaska Peninsula Positive 1,500 - 4,000 150 - 200

Sunshine Mountain Negative

Teshekpuk Positive 15,000 - 28,000 900 - 2,800

Tonzona Negative

Unimak Island

Western Arctic Positive at least 200,00012,000 - 20,000

White Mountain Negative

Wolf Mountain Negative

What is the issue you would like the board to address and why? The Mulchatna caribou herd has changed continuously from the time monitoring began, increasing from an estimated 14,000 in 1974 to 200,000 in 1996, then decreasing to ~12,000 currently. A population objective of 25,000 was initially established in 1987, and since then revised multiple times. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then. The multiple revisions in objectives over time have been a sensible approach to management of a changing resource. I request that the Board of Game review the Intensive Management population and harvest objectives with the goal of adjusting objectives to an ecologically sustainable level. I recommend this review include consideration of habitat quality, which almost certainly has changed in response to caribou grazing, reducing population potential.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed this concept with local federal and state MCH managers but am submitting the proposal individually.

PROPOSED BY: Patrick Walsh (EG-F24-090)

PROPOSAL 30

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

Implement a three-year moratorium on caribou hunting in Units 17 and 19 as follows:

Mulchatna caribou herd implements a three-year moratorium in the following Units: 9B, 17, 19A, and 19B in conjunction with the three-year moratorium in Unit 18.

What is the issue you would like the board to address and why? Due to the continued decline of the Mulchatna caribou herd, all efforts to rebuild the population is vital. Implementing a three-year moratorium on the herd in the following Units: 9B, 17, 19A, and 19B is necessary to ensure that there will be no hunting as "Every Caribou Counts." With active efforts on both state and federal management doing everything we can to ensure that rebuilding the caribou population is vital.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? After submitting a Federal Special Action Request (SAR) to close hunting on the Mulchatna caribou herd. Office of Subsistence management Wildlife Supervisor, Yukon Kuskokwim Delta Regional Advisory Council Coordinator, and I met on 4/11/2024 at 10AM to discuss in depth the SAR. During our discussion it resulted in the following actions that needed to take place. Implement a moratorium on the full range of the Mulchatna caribou herd's migratory areas. This will provide clarity that there is no open hunting season on the full range of the Mulchatna caribou herd. That we civilians, managers, and both state and feds are working together

to rebuild the caribou population. As the herd is still declining in numbers, we want to ensure that hunting remains closed until we meet or exceed the threshold.

PROPOSAL 31

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

Close the resident caribou season in Units 9B, 17 and 19 as follows.

Units 9B, 19A, 19B, 17A, 17B, 17C: Change the Resident Open Season (Subsistence and General Hunt) from 19: (August 10- September 30) change to (No open season). 17: (August 1- March 31) change to (No open season).

What is the issue you would like the board to address and why? For the security and protection that "Every Caribou Counts" on the Mulchatna caribou herd. The following changes need to be addressed to ensure hunting on the full range of the caribou migratory range continues to be closed until the population numbers have met or exceeded the 30,000 threshold to harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? After submitting a Federal Special Action Request (SAR) to close hunting on the Mulchatna caribou herd. Office of Subsistence Management Wildlife Supervisor, Yukon Kuskokwim Delta Regional Advisory Council Coordinator, and I met on 4/11/2024 at 10AM to discuss in depth the SAR. During our discussion it resulted in the following actions that needed to take place. Change state regulations to open season to No open Season. This will provide clarity that there is no open hunting season on the full range of the Mulchatna caribou herd. That we civilians, managers, and both State & Feds are working together to rebuild the caribou population. As the herd is still declining in numbers, we want to ensure that hunting remains closed until we meet or exceed the threshold.

PROPOSAL 32

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

Allow the year-round take of brown bear in Unit 17 as follows:

Allow year-round harvest of bears in Unit 17. Legal harvest still requires sealing and reporting of bears but it is far less onerous on the harvester. Less burden on the shooters will encourage more complete reporting and better data for management needs.

Specifically: in Unit 17

Resident Nonresident Open Season Open Season (Subsistence and **General Hunts)**

Units and Bag Limits

(15)

Unit 17

2 bears every regulatory year by registration permit only

2 bears every regulatory year

No closed season

[AUG. 20 – MAY 31] (Subsistence only)

No closed season [AUG. 20 – MAY 31] No closed season

No open seasons.

[AUG. 20 – MAY 31]

What is the issue you would like the board to address and why? Quite a few bears are shot in the "off season" in Unit 17 and not reported or sealed. Most of these might be considered defense of life and property (DLP) bears. However, people are generally subsistence fishing and conflict between bears and subsistence users prevent individuals from coming into Dillingham during this important season. The DLP process is extremely onerous and inconvenient, especially for those who live outside of hub communities. In other cases, the shooters fear prosecution or investigation and suspicion while just trying to put up fish, and gather food for the rest of the year Therefore, shot bears are commonly disposed of without contacting ADF&G or wildlife troopers. There is a strong desire in many villages for reduction in bear numbers, especially in close proximity to their communities and subsistence sites. With a number of guides working in the unit, and with the intensive management program in the unit, there is a strong management need for ADF&G to have better bear harvest data.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Partially, I tried to bring up the concept at the recent Nushagak Advisory Committee meeting but since development of proposals was not advertised or on the agenda, I was only allowed to briefly mention my idea. I was advised to submit a proposal and the advisory committee could review once it's in the proposal book. However, I did discuss this with area biologist who helped me with wording.

PROPOSED BY: Dan Dunaway (HQ-F24-032)*************************

Note: The Board of Game can only allow the take of wolf same day airborne under a predator control plan for which a permit is required.

PROPOSAL 33

5 AAC 92.085 Unlawful methods for taking big game.

Allow same day airborne take of brown bear and wolves Unit 17 as follows:

Allow same day airborne hunting of brown bear and wolves Unit 17.

What is the issue you would like the board to address and why? Increased liberalization of bag limits: continually meeting the harvest goals of brown bear annually warrant increased means and methods.

Record salmon returns since 2017 have likely increased bear survival and productivity.

Same day airborne would facilitate increased harvest especially in a predator control zone / area.

No conservation concerns for brown bears relatively minimal harvest primarily by nonresidents.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 34

5 AAC 92.085 Unlawful methods for taking big game.

Allow the same day airborne take of brown bear in Unit 17 as follows:

5 AAC 92.085 Unlawful methods for taking big game; exceptions.

17 Brown Bear.

Resident Hunters: You may hunt brown bear in Unit 17 from Aug. 20-May 31 the same day you have flown, provided you are at least 300 feet from the airplane.

What is the issue you would like the board to address and why? I'm writing this proposal to ask the board to adopt same day airborne hunting of brown bears for residents in Unit 17. Since 2017 Bristol Bay has seen record high returns of sockeye salmon. One can infer that due to record sockeye returns the Bristol Bay bear population has likely increased with higher productivity and higher survival due to the increased sockeye salmon abundance, the bears primary food resource.

ADFG's Unit 17 Brown Bear Species Management Report states a management objective of at least 50 bears harvested annually, with no more than 50% of the harvest comprising of females. This harvest objective has been met since at least 2011, possibly longer. This means even though harvest methods are being met, Unit 17 still has a significant abundance of brown bears. Harvest is largely driven by guided non-resident hunters, and steps have been taken to liberalize harvest and increase the take of brown bears over the last three Region 4 board cycles.

Very few individuals harvest two bears in a single season. 2022- 6 2021- 5 2020- 2 2019- 3 2018-3.

Even with the liberalization of harvest, and the sale of hides being legal resident harvest and interest still remains low. Same day airborne is a method in which more residents are likely to participate in, particularly in the spring which really drives harvest rates (two graphs below should

help show this), but fall harvest has been on a generally increasing trend the last five years. Fall harvest in Unit 17 is relatively stable due to a high proportion of moose hunters on guided combination hunts for both bears and moose. Same day airborne is already a method used across the state for other big game species (black bears, 16, deer Statewide).

In the spring of 2023 ADF&G implemented a removal project using fix wing aircraft as well as a helicopter. This costs the state hundreds of thousands of dollars in resources and staffing. Residents would be able to harvest more bears if they were able to hunt them same day airborne and alleviate some of the workload that is put on the state for removing bears in Unit 17.

The use of same day airborne means would likely increase bear harvest within the Greater Mulchatana Predator Control Area, and may help increase both caribou and moose populations due to:

- Eight years of MCH calf mortality study that determined brown bears were the leading cause of caribou calf mortality
- Three-year Unit 17B/C calf mortality study where all 23 mortalities (of 49 collared moose calves) were attributed to brown bear predation.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No, I developed this proposal myself.

Note: Trapping wolverine in Game Management Unit 18 is outside the scope of the Central Southwest Region meeting.

PROPOSAL 35

5 AAC 84.270. Furbearer trapping.

Shorten the trapping seasons for wolverine in Units 9 and 17, to the last day of February as follows:

Return the wolverine seasons in Units 9B, 17 and 18 to November 10 - last day in February.

Section 5 AAC 84.270. Furbearer trapping.

Trapping seasons and bag limits for furbearers are as follows:

(14) Wolverine

Units 1 - 5 Nov. 10 - Last day of Feb. No limit. Units 6, 7, 9(A), 9(C), 9(D), 9(E), 11, 15, and 16(B) Nov. 10 - Last day of Feb. No limit. Nov. 10 - Last day of Feb. No limit. No limit. No limit.

Unit 10	No open season	
Unit 13	Nov. 10 - Feb. 15	No limit.
Unit 14(A)	Dec. 15 - Jan. 31	2 per season
Units 14(B), 14(C), and 16(A)	Nov. 10 - Jan. 31	2 per season
Units 20(A), 20(B), 20(C) east of the Toklat River, 20(D), 20(F), and 25(C)	Nov. 1 - Last day of Feb.	No limit.
Units 12 and 20(E)	Nov. 1 - Mar. 15	No limit.
Units 17 and 18	Nov. 10 – <u>last day of Feb.</u> [MAR. 31]	No limit.

What is the issue you would like the board to address and why? The trapping season for wolverine in southwest Alaska extends into the denning period in March. If a female wolverine is trapped or shot during March, she may already have kits in the den. Changing this regulation would also maintain consistency across Unit 9 and 17 and 18 with similar habitat, terrain and latitude.

What will happen if nothing is done? Trappers will continue to trap and shoot wolverines into their denning period causing some newborns to die in the den.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This has been a topic of conversation in the area since the wolverine seasons was extended from the end of February to March 31 over 10 years ago. I have received input from other residents and trappers who the killing of female wolverines during the season is this extended trapping season is unethical.

PROPOSED BY: Rick Grant	(EG-F24-052)
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PROPOSAL 36

5 AAC 85.057 Hunting seasons and bag limits for wolverine.

Shorten the hunting season for wolverine in Unit 17 as follows:

Change the wolverine hunting season in Game Management Unit 17 to September 1 - February 29.

Section 5 AAC 85.057 - Hunting seasons and bag limits for wolverine

(a) In this section the phrase "General hunt only" means that there is a general hunt for residents, but no subsistence hunt during the relevant open season. Hunting seasons and bag limits for wolverine are also as follows: **Resident Open Season (Subsistence and Nonresident Units and Bag Limits General Hunts) Open Season** Units 1 - 5, and 13 Sept. 1 - Feb. 15 Sept. 1 - Feb. 15 (General hunt only) 1 wolverine Units 6 - 9, 12, 15, 16(B), Sept. 1 - Mar. 31 **Sept. 1 - Feb. 29**

<u>Unit 17 1 wolverine</u>, Sept. 1 - Mar. 31 [17, AND] 19 - 25, and 26(A) 1 wolverine Unit 10 No open season. No open season. Units 11, 14, and 16(A) Sept. 1 - Jan. 31 Sept. 1 - Jan. 31 1 wolverine Unit 18 Sept. 1 - Mar. 31 Sept. 1 - Mar. 31 (General hunt only) 2 wolverine Units 26(8) and 26(C) Aug. 20-Mar. 31 Aug. 20-Mar. 31

What is the issue you would like the board to address and why? The hunting season for wolverine in southwest Alaska extends into the denning period. If a female wolverine is hunted and killed during March, she may already have kits in the den.

What will happen if nothing is done? Hunters will continue to be able to shoot wolverines into their denning period causing some newborns to be abandoned and die in the den.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This has been a topic of conversation in the area since the hunting and

trapping season for wolverine were extended from the end of February to March 31, over 10 years ago. I have received input from other residents who agree killing female wolverines during their denning period is unethical.

PROPOSAL 37

Species and Units

5 AAC 84.270 Furbearer trapping.

Remove the two per day bag limit for beaver when taken by firearm and allow the use of firearm from October 10 - May 31 in Unit 17 as follows:

Open Season

Rag Limit

species and omes	Open Season	Dag Lillit
(1) Beaver		
Unit 17[, FIREARMS OR BOW AND ARROW MAY BE USED TO TAKE BEAVER FROM DEC. 1–APR. 14, AND FIREARMS MAY BE USED TO TAKE UP TO 2 BEAVER PER DAY FROM APR. 15—MAY 31]	Oct 10 – May 31	No limit.

What is the issue you would like the board to address and why? Unit 17 currently has no limit for beaver under trapping regulations and no open season under hunting regulations. The current regulation is prohibitive when there is no limit via trapping. Beaver populations are doing well and are found in the majority of drainages where there is suitable habitat in Unit 17. The harvest trend

has been decreasing since its peak in 2005 primarily due to decreased trapper numbers in Bristol Bay, lower demand for fur, decreasing fur prices, and decreased trapper incentive (Figure 37.1).

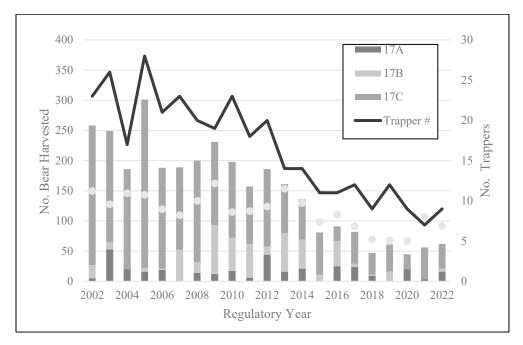


Figure 37-1. Beaver harvest through trapping and hunting in Unit 17, RY2002–2022.

There are currently no conservation concerns for beaver in Unit 17 and allowing increased methods of take and aligning season dates for take with firearm with the trapping season should reduce regulatory confusion, and aid those who subsist on fall beaver for meat and spring beaver for their fur.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 38

5 AAC 92.066. Permit for access to Walrus Island State Game Sanctuary.

Lengthen the permit dates to access Walrus Island State Game Sanctuary for hunting as follows.

5 AAC 92.006 (4) an access permit for hunting may be issued under the conditions specified by the department on a case-by-case basis, subject to the application procedures and rules set out in (1) and (2) of this section, to hunting parties for the period of September 10 - October 20 September 5 - October 20 only;

What is the issue you would like the board to address and why? Extend the hunting period from Sept 10th—October 20th to September 5th – October 20th.

Background:

- A.) Dates were chosen based off how harvesting was done by our ancestors. Now that we have new technology and just about every household has freezers to store their subsistence, preservation is no longer an issue.
- B.) Weather is becoming more of a challenge, with climate change, weather patterns are more severe into the Fall season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The proposal was developed by the Qayassiq Walrus Commission working with ADF&G and USF&WS.

Glennallen Area – Units 11 & 13

PROPOSAL 39

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

Reduce population and harvest objectives for moose in Unit 13B as follows:

Finding	Population Objective	Harvest Objective
Positive	<u>4,500–5,500</u> [5,300–6,300]	200–400 [310–620]
	G	

What is the issue you would like the board to address and why? Subunit 13B is included in an active intensive management program to benefit moose in Unit 13. A long history of harvest and population monitoring has demonstrated that moose abundance and harvest have peaked twice since 1967 (Figure 39-1, Figure 39-2).

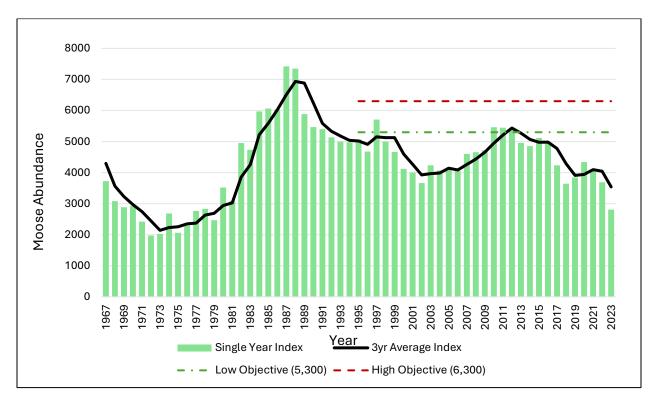


Figure 39-1. Moose abundance index in Unit 13B, RY1967–2023.

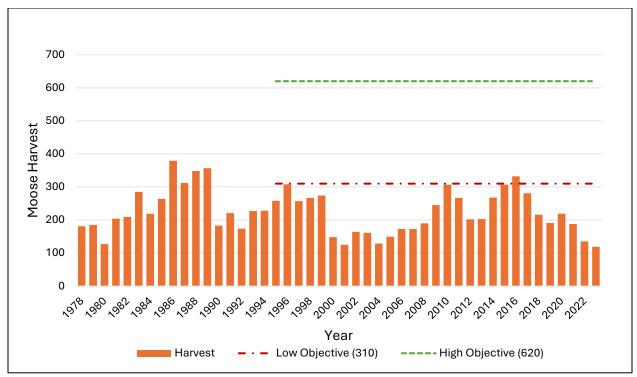


Figure 39-2. Moose harvest in Unit 13B, RY1978-2023.

The department proposes a more biologically appropriate productive and sustainable objective would be an abundance of 4,500–5,500 moose with 200–400 moose for annual harvest, based on historic peaks and valleys for these metrics. This represents a harvest rate of roughly 4.3%–6.8% and includes the long-term average of 225 harvested, with a historic range of 125–379.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-081)

PROPOSAL 40

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

Change the population objective for moose in Unit 13C as follows:

Changing the moose abundance objective in Unit 13C.

What is the issue you would like the board to address and why? The current is 2,000-3,000, and our recommendation is to change it to 2,500-3,250.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes; with the public at our local advisory committee, and the ADF&G staff.

PROPOSAL 41

5 AAC 92.108 Identified big game prey populations and objectives.

Reduce harvest objectives for moose in Unit 13C as follows:

Population	Finding	Population Objective	Harvest Objective
 Moose			
 GMU 13C	Positive	2,000–3,000	<u>80–200</u> [155–350]
• • • •			

What is the issue you would like the board to address and why? Unit 13C is included in an active intensive management program for moose in Unit 13. A long history of harvest and population monitoring has shown that moose abundance has gone through three peaks since 1967 (Figure 41-1).

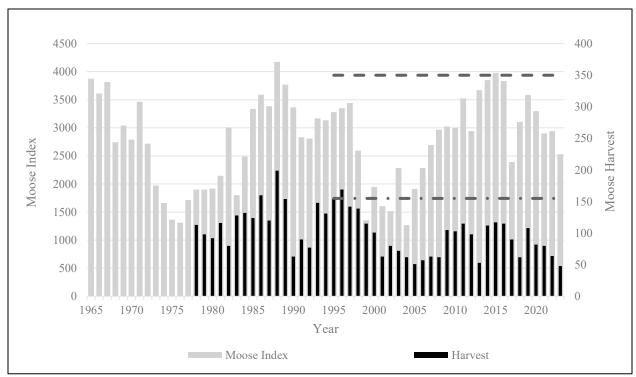


Figure 41-1. Moose abundance index and harvest in Unit13C, RY1965–2023.

Reported harvest numbers are available since 1978, but in those 46 years the minimum harvest objective has only been achieved three single years. The current harvest objectives for Unit 13C are not attainable. Furthermore, the current harvest objectives of 155–350 moose represents roughly 7.2%–10.4% of the current moose population objectives, which is not a sustainable goal. The proposed new harvest objectives for Unit 13C is 80–200 moose, which includes the long-term (approximately 65 year) average of 102 moose and also reflects harvest levels reported in recent years when moose abundance was at a historically more sustainable level. The historic range (1965-2022) of moose harvest in Unit 13C is 51–199. The new harvest objectives would represent a harvest rate of roughly 3.8%–6.3%.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 42

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

Reduce harvest objectives for moose in Unit 13E as follows:

Population	Finding	Population Objective	Harvest Objective
 Moose			
 GMU 13(E)	Positive	5,000-6,000	<u>150–300</u> [300–600]
••••			

What is the issue you would like the board to address and why? Unit 13E is included in an active intensive management program to benefit moose in Unit 13. A more than 40-year history of harvest monitoring demonstrates that moose harvest in Unit 13E has peaked twice since 1978 which coincide with peaks in moose abundance (Figure 42-1). The only year in which the lower harvest objective was achieved was in 1988, when 303 moose were harvested. The historic range (1978-2023) of harvest in Unit 13E is 86–303 moose. The current harvest objectives for Unit 13E are not attainable as demonstrated by the harvest history of the herd. The proposed harvest objectives for Unit 13E is 150–300 moose, and is based on the long-term (approx. 45 year) average of 176 moose. These new harvest objectives would represent a roughly 2.9%–4.8% harvest rate, which is reasonable for an area in which cow harvest cannot reliably be obtained due to regulatory frameworks.

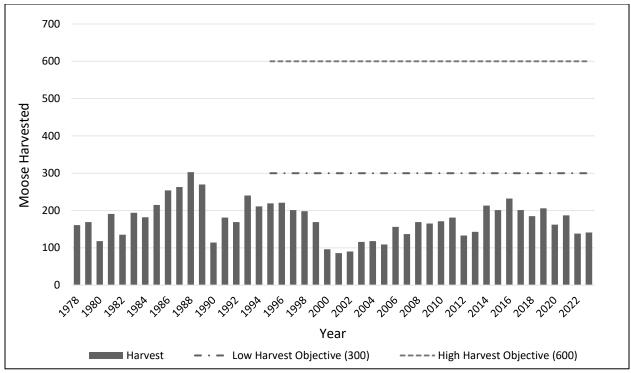


Figure 42-1. Moose harvest and objectives in Unit 13E, RY1978–2023.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-078)

PROPOSAL 43

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

Establish an antlerless moose season in Unit 13A as follows:

Resident
Open Season
(Subsistence and Nonresident
Units and Bag Limits General Hunts)
Open Season

Unit 13 1 moose per regulatory year, only as follows:

• • •

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? Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities. Unit 13A has a history of successful sustainable cow harvest incorporated into the harvest strategy with relatively high overall productivity and harvest rate for the population since 2012 (Table 43-1). This antlerless hunt opportunity was not reauthorized by local Advisory Committees in 2024 despite moose abundance being within objectives.

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence uses of 300–600 moose. After deliberating a Unit 13 proposal during the 2015 Board of Game meeting, 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. The hunt area for the antlerless hunt was restricted to the western half of Unit 13A (west of Lake Louise Road), which maintains higher moose densities than the eastern half of Unit 13A.

Table 43-1. Antlerless moose permits and total harvest in Unit 13A, Regulatory Year (RY)12–24.

		DM	.325	Otl	her			
		Har	vest	Harv	vest ^a		1% of	Estimated
Regulatory	DM325					Total	Estimated	Overall Harvest
Year	Permits	Cows	Bulls	Cows	Bulls	Harvest	Cows in 13A	Rate
2012	10	4	0	3	230	237	29	5%
2013	10	2	0	1	260	263	30	6%
2014	10	4	3	0	255	262	27	6%
2015	10	7	0	1	333	341	30	7%
2016	10	5	0	3	311	319	28	7%
2017	10	6	2	4	318	330	23	7%
2018	10	7	0	0	246	253	28	6%
2019	10	8	2	0	271	281	27	7%
2020	20	16	0	1	272	289	25	7%

2021	25	22	0	1	264	287	32	7%
2022	25	19	1	3	235	258	24	6%
2023°	20	14	0	5	148	167 ^b	27	4%
2024^{d}	20	_	-	-	-	-	-	-

^a Other harvest includes ceremonial harvest.

The current population objective for Unit 13A is 3,500–4,200 moose with a harvest objective of 210–420 moose, which represents a harvest rate of roughly 5.7%–9%. Moose abundance indices are derived from annual minimum trend counts, which can vary from year to year even when a population is stable (Figure 43-1). To address this variation the 3-year average moose abundance index is typically used to determine subunit status in relation to the midpoint of the population objectives (Figure 43-2). Moose abundance in 13A peaked near historic highs in 2013, 2015, and 2021 and has since declined to more reasonable and productive levels. A combination of intermittent wolf control and cow harvest has recently allowed the 13A moose population to stabilize at a more reasonable level within objectives. The goal is to maintain this stabilization and provide more moose in freezers, which requires cow harvest. Cow moose hunts should be implemented when a population is within objectives, with the goal of stabilizing the population before a population reaches or exceeds the higher objective because of density dependence concerns.

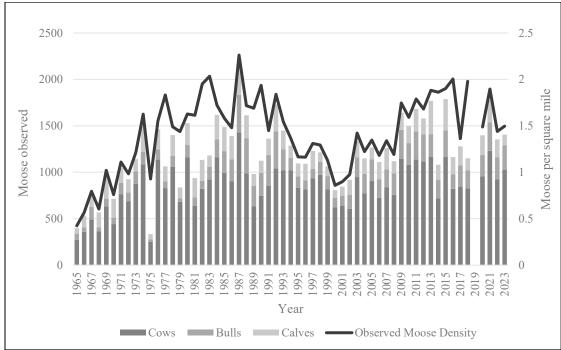


Figure 43-1. Moose minimum counts and observed density in western Unit 13A, RY1965–2023. In 1975, 1977, 1979, 1981–83, 1989–90, 2014, 2016, and 2018 only one out of two count areas were surveyed.

^b Moose hunter numbers declined with the closure of caribou seasons in Unit 13 and hunters reported unusually difficult hunting conditions, including stormy weather and late leaf drop.

^c Data has not been finalized for RY23.

^d Permits were announced for RY24 prior to Advisory Committee votes.

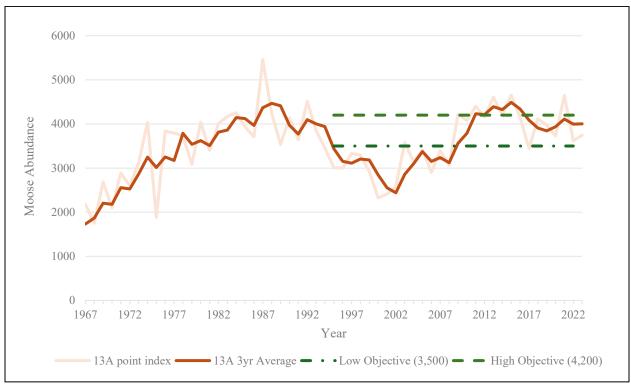


Figure 43-2. Moose population index in Unit 13A, RY1967–2023.

If antlerless moose hunting opportunities are not available in Unit 13A, the intensive management program and objectives will likely need to be reduced 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.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-079)

PROPOSAL 44

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

Establish an antlerless moose season in Unit 13C as follows:

	Resident Open Season (Salasistanes and	N	
Units and Bag Limits	(Subsistence and General Hunts)	Nonresident Open Season	
(11)			

Unit 13 1 moose per regulatory year,

only as follows:

. . .

1 antlerless moose by drawing permit only in Unit 13(C); up to 100 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or

No open season

. . .

What is the issue you would like the board to address and why? Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use when populations are doing well requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from reaching or exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities.

Oct. 1-Oct. 31

(General hunt only)

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence of 300–600 moose. The current population abundance objective for Unit 13C is 2,000–3,000 moose. Moose minimum counts in Unit 13C were near record highs from 2013 to 2019; that level of abundance has not been seen in Unit 13C since the late 1980s and late 1990s (Figure 44-1). With no cow harvest opportunity, the population peaked with an abundance index of nearly 4,000 moose in 2015, nearly 3,600 moose in 2019, and has since declined to just over 2,500 moose in 2023, suggesting that Unit 13C cannot sustain those high levels of moose abundance over the long-term. The calf-to-cow ratio in Unit 13C has shown a declining trend over the past decade, which suggests the population may have become less productive as it approached or exceeded the carrying capacity of the area. Wolf control has been suspended in Unit 13C since 2019 due to the high numbers of moose and lack of cow harvest opportunity.

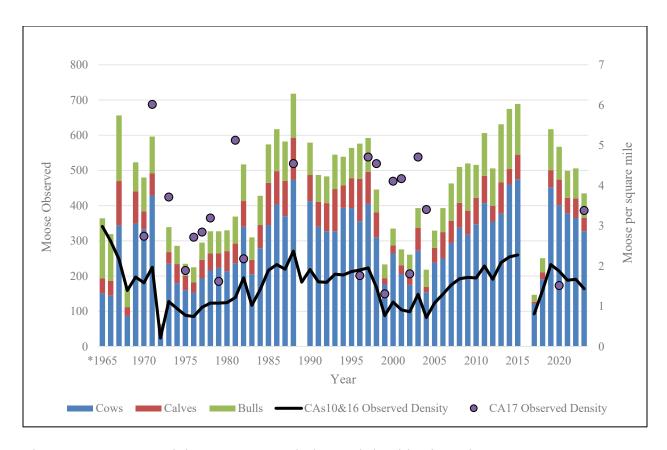


Figure 44-1. Moose minimum counts and observed densities in Unit 13C, RY65–23. In 1965, 1966, 1968, 2017, and 2018 only one count area was completed.

After considering a Unit 13 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.

Recent composition surveys indicate that the bull-to-cow ratio has been hovering at or below 25 bulls per 100 cows, (the current objective for Unit 13C) indicating that there are no additional bulls available for harvest. Stabilizing the population within the objectives will allow for a more productive population, producing more bulls as well as cows for an increase in the overall harvestable surplus. Population growth cannot be controlled through bull harvest only. Waiting to implement cow harvest after a population has peaked and beginning to decline is short-sighted and ineffective. The tool needs to be available when a population is growing toward the higher objective with the understanding that hunting permits will not be issued when the population is below the midpoint of the objectives.

If antlerless moose hunting opportunities are not available in Unit 13C, the intensive management program and objectives will likely need to be reduced 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.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 45

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

Add a five-day archery only season for hunting moose in Unit 13 as follows:

I would like to see the Board of Game take additional steps to maximize the Unit 13 moose hunting opportunity while preserving the resource.

Add a 5-day archery only season in Unit 13.

"One bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least one side by bow and arrow only" HT, August 27-31.

What is the issue you would like the board to address and why? I am not a fan of regulations that provide certain user groups exclusive access to the detriment of other user groups. I do however support adding weapon restricted seasons in addition to an existing general harvest season, when it can be used to increase the overall number of available days afield without causing a detrimental impact to the resource. Units 14 and 16 already have successfully managed archery only seasons and this would bring Unit 13 more in line with those neighboring units.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No but, by submitting this I hope to get feedback from ADF&G biologists on its viability.

PROPOSED BY: Jon Freeman	(HQ-F24-029)
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PROPOSAL 46

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

Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions as follows:

Proposed Language:

Alaska residents only:

Unit 13 Moose

August 15-27; Bull (by registration permit only).

When the harvest is projected to reach 100 animals, antler requirements of spike/fork or 50-inch antlers with at least 4 or more brow tines on one side will take immediate effect.

This hunt is closed to the use of motorized transport or pack animals, (except in portions of Unit 13 along the Parks, Denali, Richardson, and Glenn Highways), for hunting moose --- including the transportation of big game hunters, their hunting gear and/or parts of big game.

Hunters must report to the nearest ADF&G office within 24 hours of a successful kill. ADF&G may limit the number of moose to be taken in specific zones; (presently outlined in the Community Hunt guidelines.) Should the 100 bull harvest be obtained, zone requirements may be waived.

Proxy-hunting will be allowed in the August 15-27 hunt.

THIS HUNT IS DESIGNED AS A REPLACEMENT TO THE PRESENT COMMUNITY HUNT not as an additional opportunity.

What is the issue you would like the board to address and why? Replace the community hunt for moose in Unit 13 with a more equitable solution for all hunters. The present community hunt does not achieve the compete with intended purpose of helping local communities compete in the field with urban hunters. Many "communities" are composed of urban hunters who can "out-gun" locals who are not as well-funded. Our proposal levels the field and gives all hunters equal opportunity.

Read this proposal carefully. It does not take away or affect the harvest ticket hunt in Unit 13 which is presently from September 1-20th.

Our proposal is a separate entity that is contingent on [REPLACEMENT OF THE COMMUNITY HUNT] that is presently in place.

A non-motorized hunt levels the field and allows locals a significant advantage in locales that they live and work around throughout the season while not restricting anyone who wishes to hunt.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Developed by Paxson Fish and Game Advisory

PROPOSAL 47

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

Open a late season archery only drawing permit hunt for any bull moose in Units 13E and 13B, along the Denali Highway as follows:

Create a late season ANY BULL moose drawing permit for ARCHERY ONLY along the Denali highway in Units 13E and 13B.

I would propose the hunt area to be a 5-mile-wide corridor extending on either side of the Denali highway with a season of September 25th to September 30th.

What is the issue you would like the board to address and why? Alaska needs more archery specific hunting opportunities for moose. Unit 13 has some of the best access of any Unit in the state.

A late season archery only hunt for any bull moose along the Denali Highway would not increase harvest drastically but would offer a great opportunity to hunt moose in an uncrowded environment with easy access.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSAL 48

5 AAC 92.121. Intensive Management Plan V.

Modify the intensive management plan for Unit 13 to include Nelchina caribou as follows:

Modify the existing intensive management plan, or create a new intensive management plan to add the Nelchina caribou herd populations; to include cow/calf ratios, population objectives.

We expect the Department of Fish and Game to take into consideration both caribou and moose populations when creating the intensive management plan.

What is the issue you would like the board to address and why? There is not a trigger to implement intensive management to address the declining Nelchina caribou population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, with the public at our local advisory committee.

Note: Game Management Units 12 and 20 are outside the scope of the Central Southwest Region meeting.

PROPOSAL 49

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

Eliminate the harvest of Nelchina caribou as follows:

Close caribou hunting for six years or until the herd reaches the midpoint of the management objective of 37,500. This includes caribou hunting closures in Units 11, 12, 13, 14B, and 20E when Nelchina caribou are present.

What is the issue you would like the board to address and why? Eliminate any incidental take of Nelchina caribou due to the dramatic population decline seen in recent years. With an estimated population of 7,000-8,000 in fall 2023 and a population objective of 35,000-40,000, ensuring no harvest occurs of Nelchina caribou is crucial to rebuilding the herd. We are requesting a six-year hunting moratorium, or hunting closures until the population recovers and reaches the midpoint of the population objective of 37,500. This request is consistent with the March 2023 AITRC recommendation RC081 (see Attachment A).

For the 2023-2024 hunting season, both state and federal harvest of the Nelchina caribou within Unit 13 was closed; with the herd at such a low population estimate and after another heavy snow load, it is expected that winter mortality and calf recruitment will exasperate current population trends. For the herd's future longevity, AITRC asks for a six-year moratorium of the Nelchina caribou or until the herd reaches the midpoint of the population objective of 37,500. In addition, it is crucial that the Board of Game expand closures to all Units Nelchina occupies, or when present, to reduce any incidental take of a herd that has experienced such a rapid decline in recent years. This would include Units 11, 12, 13, 14B, and 20E.

Looking at reports and figures produced by the Alaska Department of Fish and Game in the Nelchina Caribou News 2017 (Figure 1) and Nelchina Caribou News 2023 (Figure 2), it is clear that GPS collared individuals reside within the Units recommended for closure. In addition, it has been observed through GPS collar data and radio tracking in fall 2012-2015 that considerable mixing occurred with Nelchina caribou within Unit 14B. Through the capture effort 22 animals were deployed with GPS collars and through tracking 40% of the caribou traveled into Unit 13E and 13A (Peltier and Brockman 2020).

It is critical that regulations are adopted to ensure the Nelchina caribou herd's additional protection while it is at one of the lowest populations observed in the last 50 years. This will allow the herd the best chance for a speedy recovery, as this herd has significant cultural ties and has been a staple food source for not only Tribal Citizens but many Alaskan residents as well.

Reference Cited:

Peltier, T. C., and C. Brockman. 2020. Caribou management report and plan, Game Management Units 14A and 14B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-11, Juneau.

Note: The figures and attachments provided with this proposal are available on the proposal book website at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? N/A

PROPOSAL 50

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

Change the sheep draw hunt DS165 in Unit 13D to a general season hunt as follows:

I would propose the board eliminate the sheep drawing permit DS165 and return it to harvest ticket regulations. This aligns that portion of 13D with the current management strategy for sheep hunting.

The new regulation would be:

Unit 13D
East of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek to the Richardson Highway

Resident Hunters: HT: One ram with full-curl horn or larger, Aug.10-Sept. 20

What is the issue you would like the board to address and why? The issue is restricted hunting opportunity on sheep hunters and the consistency of the current management strategy.

Hunt DS165 was created in 2008 when that portion of Unit 13D was converted from general harvest regulations for sheep to a drawing permit hunt. DS165 is not being managed for trophy potential or hunt aesthetics (like Tok or Delta drawing permits) and prior to being converted to a draw permit, Unit 13D received hunting pressure consistent with Unit 20A which is currently still utilizing general harvest regulations.

Since there is no biological concern with low density sheep numbers and harvesting rams under the full curl regulation, hunt DS165 goes against the current management strategy and is not necessary for conservation purposes.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? No.

PROPOSAL 51

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

Open a resident only sheep hunt in the Chitina River drainage in Unit 11 as follows.

If adopted, the new regulation would appear under the sheep regulations of Unit 11, on page 71 and read as follows:

The area of Unit 11, North of the Chitina River, west of canyon creek, and south of young creek (MacColl ridge): Nonresident: No open season.

What is the issue you would like the board to address and why? Create a RESIDENT ONLY sheep hunt in the Chitina River drainage, specifically the MacColl Ridge complex. MacColl Ridge is an isolated area within Unit 11 that holds a small population of Dall sheep. Due to its close proximity to a hunting lodge that specializes in sheep hunts, the majority of hunting pressure and harvest of sheep on MacColl Ridge is likely from guided nonresidents. In a time with declining sheep populations but high nonresident demand, there needs to be areas of opportunity for resident hunters to hunt sheep without the added competition and pressure from guided nonresidents. This regulation takes very little opportunity from nonresident hunters, as they can freely hunt the remainder of Unit 11.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was developed solely by myself.

PROPOSAL 52

5 AAC 92.530. Management areas.

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

Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only, as follows:

If adopted, the new regulation would appear under the sheep regulations of Unit 11, on page 71 as well as on page 69 as a management area and read as follows:

MacColl Ridge Management Area:

The area of Unit 11 North of the Chitina River, west of Canyon Creek, and south of Young Creek (MacColl Ridge): **Open to sheep hunting by registration permit only.**

RESIDENT SEASON: Aug. 10th to Sept. 20th

NONRESIDENT SEASON: No open season

What is the issue you would like the board to address and why? Create a new management area around MacColl Ridge open to sheep hunting by registration permit only, with no open season for nonresidents.

MacColl Ridge is an isolated set of mountains in the Chitina River drainage within Unit 11 and holds a small population of Dall sheep. Due to its close proximity to a hunting lodge specializing in sheep hunts, the majority of hunting pressure and harvest of sheep on MacColl Ridge is likely from guided nonresidents. At the present time, sheep populations around Alaska are severely depleted, areas are being shut down further limiting resident opportunity, and non-resident demand for hunts is at an all time high. There needs to be areas that give opportunity and preference to resident sheep hunters to hunt without the added competition and pressure from guided non-residents.

MacColl Ridge is an ideal location for this proposed regulation because: 1) It's an easily defined landmark and boundary. 2) It's one of the more accessible areas of unit 11 with ample landing spots to drop hunters. 3) Takes very little opportunity from non-resident hunters, as they can freely hunt the remainder of Unit 11.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Coordination with other hunters.

PROPOSED BY: Jesse Dunshie	(EG-F24-006)
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PROPOSAL 53

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

Establish a resident, archery only sheep drawing hunt in Unit 13D as follows:

Create an archery only resident Dall sheep drawing hunt for Unit 13D that includes both Units 13D West and East into one hunt area. Season dates would be October 1-15th and the bag limit would be a full curl ram. It is understood that sheep numbers are down in these areas so the Department of Fish and Game may only want to issue 1-5 tags until populations begin to recover. Archery hunting for full curl rams is very low success < 5% but provides archery hunters the opportunity to hunt without the competition of rifle hunters who can shoot rams at ever increasing distances. As an item of note an additional proposal was submitted in the statewide regulations that would NOT allow the use of aerial scouting during these season dates.

What is the issue you would like the board to address and why? Limited archery only sheep hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-078)

PROPOSAL 54

5 AAC 85.055. Hunting season and bag limits for Dall sheep.

Change the bag limit for the Unit 13D sheep drawing hunts, DS160 and DS260 as follows:

R Unit 13D "west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek" One ram with a full curl horn or larger, 8 yrs old or two broken tips (broomed) [ANY RAM] by permit.

NR Unit 13D "west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek" One ram with a full curl horn or larger, 8 yrs old or two broken tips (broomed)
[ANY RAM] every four regulatory year by permit.

What is the issue you would like the board to address and why? Currently there are low ram populations in permits DS160 and DS260 area, which includes "west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek". This needs to align with the rest of Unit 13D's permit hunts including DS165 and DS265, with a full curl horn or larger, 8 years old or two broken tips (broomed) regulation criteria. This area, "east of a line along the west side of Tazlina Glacier, Tazlina Lake and to Mendeltna Creek to the Richardson Highway", would then align with the conservation approach of the neighboring permit area as mentioned above. Full curl horn or larger, eight years old or two broken tips (broomed) regulation criteria should be used in areas with low ram populations to secure future healthy ram populations by not harvesting young and immature, non-breeding rams.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed with the coordination of the Matanuska Valley Advisory Committee. Members of the committee were able to share information regarding this hunt area to develop this proposal.

PROPOSAL 55

5 AAC 85.040. Hunting season and bag limits for goat.

Divide the goat drawing permit hunt DG720 into three separate permit hunts as follows:

I would propose the DG720 permit be split up into three different permits with smaller hunt areas and separate quotas. The new structure could look as follows:

DG720 = Area east of the Richardson hwy to include the Tonsina Controlled Use Area, DGXXX = Unit 13D west of the Richardson hwy to east side of Tazlina Glacier, and DGXXX = Unit 13D Tazlina Glacier west to Coal Creek drainage (remainder of current DG720 area).

What is the issue you would like the board to address and why? DG720 receives about 2,000 applications per year but only eight permits were issued for 2024. With such a large hunt area, it should be able support a harvest of more than eight goats. Only a small portion of DG720 is road accessible, which probably sees the highest hunter effort and therefore harvest. To offer more permits, better opportunity to hunters, and most likely better population management, DG720 should be split into three separate permits consisting of smaller hunt areas with separate quotas.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSAL 56

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

Establish an archery only registration goat hunt in Units 13D and 11 as follows:

Create an additional archery only registration goat hunt for RG580 (Units 13D and 11) with season dates of August 16 - 31. The permit bag limit is one goat for residents and nonresidents and the permit may only be issued in person at the same locations as the RG580 permit.

What is the issue you would like the board to address and why? Limited archery only goat hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSAL 57

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

Increase the bag limit for brown bear in Unit 13 as follows:

B -Brown/Grizzly Bear: 13E within Denali State Park <u>TWO</u> [One] bear(s) every regulatory year from August 10-June 15

B -Brown/Grizzly Bear: 13 remainder **TWO** [One] bear(s) every regulatory – no closed season

What is the issue you would like the board to address and why? Brown and grizzly bears are currently at high population levels in Unit 13 and their hardship on moose and caribou are reaching

unstainable levels. Many hunters use bait stations and/or motorized vehicles hunt for brown/grizzly bears during the spring and early summer in Alaska but are unable to take a bear in the fall due to the one bear per regulatory regulation. This would allow for another opportunity to hunt brown/grizzly bears in the fall, while still allowing for traditional spring bear hunting opportunity. Unit 16 saw an increase to two brown/grizzly bears per regulatory year and the unit has seen the positive effects on moose populations with its change.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed in coordination with the Matanuska Valley Advisory Committee as many of our members are closely familiar with Unit 13 and its constituents are primary members of Unit 13.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (HQ-F24-033)

PROPOSAL 58

5 AAC 92.121. Intensive Management Plan V.

Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves as follows:

Decrease the minimum wolf population to 100 in Unit 13 in the Intensive Management Plan.

What is the issue you would like the board to address and why? The current minimum wolf population in Unit 13 is 135 which is too high for Nelchina caribou population recovery. The Nelchina caribou herd population objective is 35,000 - 40,000, we are currently at around $8000 \sim$ animals. The entire caribou harvest is closed, and the management objective for this herd is to provide for subsistence needs.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, with the public at our local advisory committee, and the ADF&G staff.

PROPOSAL 59

5 AAC 84.270. Furbearer trapping

Lengthen the wolf trapping season in Unit 11 as follows:

October 15 [NOV 10] - April 30 [MARCH 31]

What is the issue you would like the board to address and why? Lengthen the Unit 11 wolf trapping season to align with the season dates in Units 12 and 13 in order to provide additional opportunity to harvest wolves. SRC members noted that wolves are abundant and that providing

additional harvest opportunity could help mitigate predation on other species such as sheep, moose, and caribou.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal is being submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, a citizen advisory committee. The Commission met in Gakona, Alaska, on March 14 and 15, to hear from the public and discuss a variety of issues related to fish and wildlife harvest. The Commission developed this proposal during that meeting.

PROPOSAL 60

5 AAC 84.270. Furbearer trapping.

Lengthen the coyote trapping season in Unit 11 as follows:

October 15 [NOV 10] - April 30 [MARCH 31]

What is the issue you would like the board to address and why? Lengthen the Unit 11 coyote trapping season to align with the season in Unit 12 in order to provide additional opportunity to harvest coyotes. Providing additional harvest opportunity could help mitigate predation on other species such as sheep, moose, and caribou.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal is being submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, a citizen advisory committee. The Commission met in Gakona, Alaska, on March 14 and 15, to hear from the public and discuss a variety of issues related to fish and wildlife harvest. The Commission developed this proposal during that meeting.

PROPOSAL 61

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

Change the start date for the ptarmigan hunting season in Unit 13B as follows:

Ptarmigan Unit 13B

August 20 - February 15

10 per day - 20 in possession

What is the issue you would like the board to address and why? Ptarmigan season opening date in Unit 13B.

Ptarmigan season in Unit 13B opens August 10. Unit 13B is road accessible and sees a fair amount of hunt pressure. Much of the high country along the Denali Highway where the majority of the ptarmigan are taken, experience late spring hatches due to snow cover. The results in later hatching chicks that are still peeping when the present season opens August 10.

Birds that small are of marginal use for food. Hunting is enjoyable to be sure, but the primary objective should be the use of animals and birds we take. Thus, our committee feels that an August 20 opening would better address the issue of having a bird worth eating. This is the fifth game cycle our advisory committee has addressed the issue to no avail. We hope that this board would consider our experience and accept our proposal.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Paxson Fish and Game Advisory Committee.

PROPOSAL 62

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

Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D as follows:

Option 1

Unit	Season	Bag Limit
13A, 13C, 13D	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
13A, 13C, 13D	August 10 – March 31	10 ptarmigan per day, 20 in possession
13A, 13C, 13D	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Units 13A, 13C, and 13D to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Units 13A, 13C, and 13D ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17- 26 to do so. This would also allow individuals living in the region to take

advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Units 13A, 13C, and 13D by one month would be unlikely to cause a negative impact on the population. In the alternative, any potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.

PROPOSED BY: Jonathon Green (HQ-F24-028)

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PROPOSAL 63

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

Require a registration permit to hunt ptarmigan in Units 13B and 13E as follows:

Units and Bag Limits (3)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 13(B) 10 per day 20 in possession, by registration permit only;	Aug. 10–Feb. 15	Aug. 10–Feb. 15
Unit 13(E) 10 per day 20 in possession, by registration permit only;	Aug. 10–Feb. 15	Aug. 10–Feb. 15

What is the issue you would like the board to address and why? Ptarmigan hunting in Alaska is a very popular activity for both subsistence and non-subsistence users. Data from voluntarily submitted hunter harvested wings suggest Unit 13B is one of the most popular, if not the most popular, subunits to hunt ptarmigan in terms of the number of hunters that successfully harvested ptarmigan. Despite this popularity, there is no requirement for small game hunters to report on their harvest and all harvest data available is voluntarily submitted, with a few exceptions in state game refuges or management areas near urban areas.

Although voluntarily submitted harvest information is helpful to ADF&G, biologists have very limited ability to collect data on the total number of small game hunters from year to year or annual

harvest rates. Previous efforts to collect data through hunter surveys (2012–2013) from the large number of resident and non-resident hunters that had multiple license purchase options (e.g., resident hunting, resident hunting and trapping, non-resident small game, non-resident hunting, non-resident military hunting and trapping, etc.) were hampered by low hunter response rates (11–30%) and the need to sample from all license purchase options to obtain a meaningful data set.

A registration permit for hunting ptarmigan in Unit 13B would provide important data from an area that receives heavy hunting pressure, has limited participation in voluntarily submitted harvest information, and has historically experienced multiple regulatory changes resulting from proposals submitted by members of the public and local advisory committees.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-076)

Palmer Area – Units 14A, 14B & 16

PROPOSAL 64

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:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(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 of Game (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.

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. Increased harvest based on the increased permit levels has brought the population closer to the objective of 6,000–6,500 for the nit. Permit levels have been reduced significantly as the population approached the objective and will be adjusted as necessary.

Moose surveys conducted in November 2023 yielded an estimate of 6,657 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2020 survey estimate of 7,112 moose indicating that antlerless harvests are having the desired effect of reducing the population to near objectives. The sex and age composition demonstrated a bull:cow ratio of 30 bulls:100 cows and a calf:cow ratio of 28 calves:100 cows.

Moose-human conflicts have declined along with the moose population as it has approached the population objective. The targeted moose hunts in Units 14A and 14B, which are authorized to include an antlerless component, have been a tool to address public safety concerns related to moose-vehicle collisions and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 316 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. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure. Antlerless hunts are an important tool to control the moose population's trajectory and recommend additional moose hunting opportunity in the Matanuska-Susitna Valley when appropriate.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

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

Decrease the number of antlerless moose permits for Unit 14A as follows:

Aug. 25 - Sept. 25 1 antlerless moose by drawing permit only; up to **1,000** [2,000] antlerless moose permits may be issued;

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 by emergency order.

Total annual permits that may be issued to harvest antlerless moose in Unit 14A shall not exceed 1,000.

In order to better control moose reductions in specific habitat areas, all November and December Unit 14A moose permits may only be issued in the same specific hunt areas as the fall permit hunts — Not Unit-wide.

Note: this proposal only seeks to address the portions of 5 AAC 85.045 allowing harvest of antlerless moose by permit(s) in Unit 14A.

What is the issue you would like the board to address and why? Antlerless moose permit hunting regulations in Game Management Unit 14A are too liberal with amounts of permits allowed far in excess of what has ever been granted. Issuing hundreds of November and / or December permits adds stress to the moose population at times when they may already be struggling through winter conditions, and can result in over harvest of moose in easily accessible areas with prime winter habitat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? YES. This proposal was considered and approved without objection for submission at the April 17, 2024, Matanuska Valley Fish and Game Advisory Committee meeting, which included considerable discussion with ADF&G game division staff about this proposal.

PROPOSAL 66

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

Open a fall, archery only moose hunt in Units 14A and 14B as follows:

Units 14A, 14B (Harvest Tag areas only) One bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines on at least one side by bow and arrow only from August 10-19 and **September 26-30.**

What is the issue you would like the board to address and why? Years ago, the general moose season in Units 14A and 14B was augmented with an early archery season. While this was a positive move for increasing hunter opportunity but the early season, especially in recent years, is fraught with challenge, most notably the warm temperatures which make responsible meat handling (and aging) difficult. Archery hunting has a low success rate even during the rut and extending the archery season for the last five days of September would increase opportunity during a colder, more meat friendly time of year, without significant impact on moose populations. This would also give hunters who wish to hunt with bow and arrow a few days of time later in the season to hunt without fear of being shot at/over trying to get close to a bull.

It's also worth noting that, based on the popularity of the Eklutna Lake archery moose hunt, there are a lot of hunters very interested in finding archery moose hunting opportunities. This would be a step in the right direction toward increasing opportunity for them.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Paul Forward (EG-F24-095)

PROPOSAL 67

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

Open a fall, archery only moose hunt in Unit 16A as follows:

Unit 16A (Harvest Tag areas only): 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 from August 10-19 and **September 26-30.**

What is the issue you would like the board to address and why? Years ago, the general moose season in Units 14A, 14B and 16A was augmented with an early archery season. While this was a positive move for increasing hunter opportunity but the early season, especially in recent years, is fraught with challenge, most notably the warm temperatures which make responsible meat handling (and aging) difficult. Archery hunting has a low success rate even during the rut and extending the archery season for the last five days of September would increase opportunity during a colder, more meat friendly time of year, without significant impact on moose populations. This would also give hunters who wish to hunt with bow and arrow a few days of time later in the season to hunt without fear of being shot at/over trying to get close to a bull.

It's also worth noting that, based on the popularity of the Eklutna Lake archery moose hunt, there are a lot of hunters very interested in finding archery moose hunting opportunities. This would be a step in the right direction toward increasing opportunity for them.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

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

Change the bag limit of the fall, Tier II moose hunt in Unit 16B as follows:

If the harvestable portion of moose in Unit 16B is 199 moose or less then there will be a Tier II season in the fall, August 20 to September 25th with a <u>limit of 1 bull</u> and the winter season.

What is the issue you would like the board to address and why? Current regulations state that when the harvestable surplus of moose in Unit 16B numbers 199 or less, the Unit goes to a Tier II season with a fall season that requires spike-fork, three brow tines, or 50-inch antler requirement and a winter season that is any bull. The committee sees no reason to limit the fall portion of this season if it occurs, to bulls with these antler configurations when the winter portion of the hunt has no restriction. We fail to see the logic. This hunt is already limited by the number of participants which will limit harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Mt. Yenlo discussed and recommended this proposal.

PROPOSED BY: Mt. Yenlo Fish and Game Advisory Committee (EG-F24-022)

PROPOSAL 69

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

Shorten the season for the Tier II moose hunt in Unit 16B as follows:

TM565, TM567, and TM569 season: December 15th to February 28th

We would like to eliminate March from the Tier II season in Unit 16B.

What is the issue you would like the board to address and why? Harassment of winter stressed moose in March. The Tier II moose hunt was extended into March when the season start date was pushed back to December 15th to curtail trophy hunting of winter moose under the guise of subsistence. The season prior to this change ended February 28th. We feel that two and half months is plenty of time for a diligent subsistence hunter to harvest a better quality animal and the later period just leads to more harassment determining legality as antler shed spots grow darker and unnecessary stressing of already winter stressed moose.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was discussed and recommended by the Mt. Yenlo Advisory Committee.

5 AAC 85.050. Hunting seasons and bag limits for brown bear.

Extend the hunting season for brown bear in Units 14A and 14B as follows:

I suggest extending the brown bear hunting season in Unit 14A and 14B to June 15.

Unit 14A: One bear every regulatory year Sept 1-June 15

Unit 14B: One bear every regulatory year Aug 10-June 15

What is the issue you would like the board to address and why? With Heavy snow fall becoming a norm in Southcentral, in these Units brown bear hunters often do not get an opportunity to harvest when bears are in accessible areas. Brown bears will often show up on bait stations and accessible areas one-two weeks after the season closes May 31st.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 71

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

Extend the brown bear hunting season in Unit 14B as follows:

I recommend extending brown bear season through June 30 allowing these bears to be taken through the baiting season. To align with some of the other areas opened to baiting brown bears.

The new regulation change would read "One bear every regulatory year **August 10-June 30** in Unit 14B."

What is the issue you would like the board to address and why? The population of brown bears in Unit 14B is growing rapidly. In the span of eight years my trail cameras in Unit 14B over bait have shown five-six brown bears and five-six black bears in 2015 and in 2023, 10-15 brown bears and only one black bear.

Brown bear season closes on May 31, depending on the spring the brown bears are not showing up until around the first week of June. If the population of brown bears is not controlled I believe we will continue to see increasing brown bear populations and decreased black bear populations until eventually the area will be depleted of black bears completely.

Also in Unit 14B, the moose population is on the lower end of the acceptable objective. Why not try to get ahead of it with extending the brown bear season and giving hunters more hunting opportunity to harvest brown bears.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Dominic Nickles (EG-F24-010)

PROPOSAL 72

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

Eliminate the harvest ticket requirement for hunting black bear in Unit 16 as follows:

Black Bear GMU 16 No harvest ticket. Must be sealed within 30 days of harvest.

What is the issue you would like the board to address and why? Unnecessary requirement for harvest ticket for black bears in Unit 16. This has never been necessary. Bears are required to be sealed just like brown bears, however no harvest ticket is required for brown bears. This requirement just leads to fraud, waste and abuse and possibly less bears harvested due to not having a harvest ticket when defending property, fishing, or hunting other species.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The Mt. Yenlo Advisory Committee discussed and recommended this proposal.

PROPOSAL 73

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

Change the bag limit for sheep in Unit 14A draw hunts to any ram as follows:

This proposal would change the bag limit for Dall sheep in Unit 14A south and east of Matanuska River from one ram with full-curl horns or larger, both horns broken, or at least eight-years-old, to one ram.

What is the issue you would like the board to address and why? The issue is reduced sheep hunter satisfaction and harvest opportunity. Many new and inexperienced sheep hunters are less likely to participate because of challenges with judging legal full-curl rams, Previously, many of the any-ram sheep hunters reported high satisfaction and less stress when not having to "be 100% sure" of shooting what they believe to be a legal ram. In addition, ADF&G staff have reported recent increased take of sub-legal rams (statewide) under full-curl bag limits concurrent with

reduced overall sheep populations. The any-ram bag-limit is a positive alternative to full-curl and is entirely manageable and appropriate under a regulated drawing hunt by setting permit levels based on population survey data and observed mature ram numbers. Sheep hunters participating in any-ram hunts still prefer older-aged rams and generally take more older rams (>4 yrs) which may be more closely simulating natural mortality in the ram component of the population. Having a few limited sheep drawing hunts with this type of bag limit benefits both sheep hunters and ADF&G by providing unique draw hunt opportunity, increased hunter satisfaction, and reduced sub-legal harvest.

According to ADF&G, more people applied for the Unit 14A any-ram drawing hunts than any other sheep draw hunts available in Alaska except for the Tok Management Area (TMA) draw hunts (currently significantly reduced due to population issues). Even for a limited number of sheep draw hunts - in this case Unit 14A - the any-ram bag limit would provide a popular alternative for sheep hunters and address current concerns regarding sub-legal harvest, both of which increase hunter satisfaction and meet department goals (reduce sub-legal harvest and increase hunter satisfaction).

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? As of this date I have not coordinated with others regarding the proposal. Earlier, I consulted with ADF&G staff regarding current trends. I plan to discuss the proposal with the Mat Valley Fish and Game Advisory Committee and possibly other advisory committees when they resume meeting in the fall.

PROPOSAL 74

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

Establish a resident, archery only, sheep drawing hunt in Unit 14A as follows:

Create an archery only resident dall sheep drawing hunt for Unit 14A that includes all units within 14A into one hunt area. Season dates would be October 1-15th and the bag limit would be a full curl ram. It is understood that sheep numbers are down in these areas so the department may only want to issue 1-5 tags until populations begin to recover. Archery hunting for full curl rams is very low success < 5% but provides archery hunters the opportunity to hunt without the competition of rifle hunters who can shoot rams at ever increasing distances. As an item of note an additional proposal was submitted in the statewide regulations that would NOT allow the use of arial scouting during these season dates.

What is the issue you would like the board to address and why? Limited archery only sheep hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

5 AAC 92.122. Intensive Management Plan VI.

Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan as follows:

5 AAC 92.122

. . .

(b)

(4)

. . .

(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 of wolf removal <u>and may allow</u> <u>department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783.</u>

. . . .

What is the issue you would like the board to address and why? The wolf control objective in the Intensive Management Plan for Moose in Unit 16 is to reduce the population to 35–55 wolves in Unit 16B. In March of 2023 the minimum count of wolves in Unit 16 indicated at least 120 wolves with several packs being reported in the unit that were not included in the minimum count. Six of the packs were located again in the fall of 2023, and all had increased in number by 2–6 per pack, indicating that the population was over 120 with the addition of the 2023 recruitment. A take of at least 70% annually is needed to achieve the population reduction objective. Given the high recruitment rate of wolves, population reduction is unlikely unless there is substantial harvest over a short period of time.

100 wolves need to be taken annually to reach the wolf population objective of 35-55 wolves. Based on participation the last time the program was active, it is unlikely this level of harvest will be achieved in this first year of the reactivated program due to potentially low participation in the program. There are two primary reasons that participation is low. First, a high proportion of wolves sealed from Unit 16 have lice (~60% in RY23) resulting in poor pelt quality; and second, control pilots have many options to participate in same day airborne programs such as in Units 9, 17, 19, and all of Unit 13 except 13C. If pelt quality remains an issue and pilots and public participation remains low in the future it may be necessary for the department to actively remove wolves from this area to achieve the wolf reduction objectives.

When the Unit 16 Predation Control Area was created the regulations did not allow for the department to do the removal. Adding the ability for the department to conduct control efforts of wolves and bears ensures the department has the ability to actively manage predators in the area to aid in achieving the population and harvest objectives set by the board. The department has no plans to activate bear control at this time.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 76

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

Allow the take of brown bear in Unit 16, the same day airborne as follows:

Existing regulation

•You may hunt black bear in Unit 16 from Oct. 1-Aug. 9 the same day you have flown, provided you are at least 300 feet from the airplane

Proposed regulation

•You may hunt black bear <u>and brown bears</u> in Unit 16 from Oct. 1-Aug. 9 the same day you have flown, provided you are at least 300 feet from the airplane

What is the issue you would like the board to address and why? Increase harvest opportunity for brown bears in Unit 16B.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 77

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

Extend the brown bear season in Unit 14B as Follows:

Unit 14B One bear every regulatory year Aug. 10- June 15th

Extending the season by 15 days would ensure that brown bears hides would still be of good trophy quality. If this regulation is passed it would align with the Unit 14C remainder of June 15th for brown bear.

What is the issue you would like the board to address and why? Brown bear population currently in Unit 14B has increased substantially. Due to the late springs/ break ups over the past few years, brown bears are showing up after season is closed. Taking over bait stations, making it very difficult to harvest a black bear. With the surplus of brown bears, extending the brown bear season in Unit 14B would allow hunters to harvest brown bears into June. It also has the potential to have positive effects on the moose population. There is no threat of over harvest in this very heavily forested unit by extending the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed in coordination with the Matanuska Valley Advisory Committee.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (HQ-F24-049)

PROPOSAL 78

5 AAC 92.122. Intensive Management Plan VI.

Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan as follows:

Change the regulation so if the intensive management is active, hunters or trappers holding a current license can hunt same day airborne as long as 300' from airplane. If the intensive management area is inactive, we go back to the past 3 a.m. regulation.

What is the issue you would like the board to address and why? Change same day airborne for wolf in active intensive management areas to allow hunting same day airborne as long as 300' from the airplane. I believe it should be allowed in the predator control areas for hunters and trappers to have the opportunity to shoot the same day airborne when the state is allowing aerial shooting but only to a few approved pilots and gunners.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee.

PROPOSAL 79

5 AAC 84.270. Furbearer trapping.

Extend the wolf trapping season in Unit 14A as follows:

Unit 14A wolf trapping season extended by one month to April 30th.

What is the issue you would like the board to address and why? To lengthen wolf trapping season in Unit 14A by one month to April 30th like all of the other units in Alaska. I think by having one extra month it'll give more time as the weather is changing to be able to harvest more wolves.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No. I trap all over in Alaska and having that one extra month like over in Unit 16 helps tremendously in reducing predator numbers.

PROPOSED BY: Michael Gozdor II (EG-F24-007)

PROPOSAL 80

5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

Require sealing of beaver taken in Unit 16 as follows:

Beaver GMU 16 Must be sealed within 30 days of close of season.

What is the issue you would like the board to address and why? A severe decline in beaver in much of Unit 16 has occurred. At the same time, the Board of Game has liberalized seasons, methods and means. It has been at least a couple of decades since beaver were sealed in Unit16. The committee has some theories as to why the beaver have declined. We would like the Department of Fish and Game to collect some sealing information, so as to compare current harvests, take, and size composition with past data when populations were far more robust. This information would be valuable in assessing current problem and cost very little. We would like this to continue for three years.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The Mt. Yenlo AC discussed and recommended this proposal.

PROPOSAL 81

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

Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours as follows:

Persons setting traps and snares for furbearers and fur animals must check their traps and snares not less frequently than every 36 hours in those parts of Unit 14A that are within two miles of a publicly maintained road (i.e. a road that is open to the public and plowed to be accessible by automobile).

What is the issue you would like the board to address and why? Many Alaskans, including myself, think it is inhumane to leave an animal caught in a trap or snare to die of starvation or exposure because a trapper fails to check his traps frequently. Criminal penalties are imposed under Alaska law against the owners of domestic animals who fail to feed or shelter their domestic animals because it is inhumane. Ethical trappers of furbearers and fur animals return frequently to their traps to prevent waste and also to lessen the suffering of trapped animals. This proposal is intended to apply only to a small part of a heavily populated part of Alaska in the hope that trappers and persons opposed to trapping on ethical grounds can work together in lessening the suffering of animals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I am a member of the Anchorage Advisory Committee and serve on the Game subcommittee. The Anchorage AC does not usually submit proposals and does not meet until October 2024. The Anchorage AC will review and comment on this proposal when it reviews all the proposals to be considered by the Board of Game.

PROPOSED BY: Kneeland Taylor (EG-F24-083)

PROPOSAL 82

5 AAC 92.550. Areas closed to trapping.

Establish 50-yard trapping setbacks along specific trails in Unit 14 as follows:

In 2022, Alaska Wildlife Alliance submitted a proposal for 50-yard trap setbacks from multiple trails in Units 13, 14 and 16. At the 2022 Central & Southwest meeting, the Board of Game deferred the proposal until a stakeholder meeting between trappers and non-trappers was convened under the facilitation of a board member. The purpose of the meeting was to discuss the setback proposal and "attempt to come up with solutions that would reduce potential conflicts between trapping and loose dogs, along highly developed trails in the Matsu Borough."[1]

Stakeholders included representatives from Alaska Wildlife Alliance, non-trapper trail users, and trappers representing Alaska Frontier Trappers Association and Alaska Trappers Association. ADF&G staff were also present. The one-day meeting adjourned with consensus on the following setback location and conditions. We seek for these agreed-upon trails and restrictions to be codified in this proposal:

No trapping or snaring within 50-yards of the below-listed trails unless the traps are elevated three feet above hard ground, enclosed, underwater, or under ice. Trapping would still be permitted on the below-listed trails if they are elevated three feet above hard ground, enclosed, underwater, or under ice. All other forms of lawful trapping would also still be allowed near the below-listed trails, provided they are placed farther than 50-yards from the trail.

Unit	Trail name	Description
14B	Talkeetna Lakes Park trail system (XYZ lakes trails)	A trail system for skiing, hiking and mountain biking located within the Talkeetna Lakes Park. Construction of a trailhead facility at the park entrance was completed in 2007 and trails are maintained by Denali Nordic Ski Club. See map here
14B	Dorothy Jones Trail System (Susitna Valley High School)	Trail system consists of a series of loops built on rolling hills between the Su Valley High School and Montana Lake. There are varying levels of difficulty from novice to expert.
14A	Matanuska Lakes State Recreation Area developed trails	Includes a pedestrian year round trail system and maintained ski trails. Map available here.
14A	Scout Ridge Loop	Well-established trail located off Hayfield Road in the Knik-Fairview area. This year-round trail is used in the winter by hikers, skiers and snowshoers. See <u>map here</u> .
14A	Reflections Lake Trail	Located south of Palmer just off the west side of the Glenn Highway on the north side of the Knik River. This year-round trail is used in the winter by hikers, skiers and snowshoers, and in the summer/fall by hikers, hunters and fishermen. See map here .
14A	Nelson Road	Palmer Hay Flats area. See map <u>here</u> .
14A	Rabbit Slough Boat Launch Access Road	Palmer Hay Flats. See map <u>here</u> .
14A	Wasilla Creek Boardwalk (Nelson Road)	Palmer Hay Flats. See map <u>here.</u>
14A	Government Peak Recreation Area developed Trails system within the southern development area	There are 4 miles (6.5 km) of Nordic skiing/hiking trails built for all skill levels. There is an additional 4 miles of bike trails intertwining with the skiing/hiking trails. Below the Chalet there is a sledding hill for all ages. The ski trails area maintained by the Mat-Su Ski Club for both summer and winter use. Mountain bike trails are maintained by the Valley Mountain Bikers and Hikers. See map here.

14B	Independence Mine ski trails	Year round trail within the Hatcher Pass Management area. See map <u>here.</u>
14B	Gold Mint trail to Mint Glacier	Year round trail within the Hatcher Pass Management area. See map <u>here.</u>
14B	Reed Lakes trails to lower Reed Lake	Year round trail within the Hatcher Pass Management area. See map <u>here.</u>
14B	Archangel Road to the gate	Year round trail within the Hatcher Pass Management area. See map <u>here.</u>

Fifty yards is the minimum precedented distance for trap setbacks in Alaska. In Unit 1C, for example, Juneau-area designated trails have a regulated ¼ mile trap setback and 15C has 100-yard trap setbacks from specific trails. For trails outside the Juneau area in Unit 1C, the ¼ mile setback is also applied except for traps with an inside jaw spread of five inches or less, which can only be set if they are at least five feet above the ground and snow and are more than 50 yards from the trail. Additionally, in 2019 the Anchorage municipality passed an ordinance for 50 yard no-trap setbacks from designated trails in the Anchorage Municipality. In sum, the 50-yard distance is precedented as a reasonable compromise between various users, and has been implemented in other areas of the state. Trappers at the stakeholder meeting agreed that the setback distance would be appropriate on the above-listed trails.

The setback distance is small enough to not significantly reduce the Board of Game's ability to manage wildlife. Should trapping of a species within this setback be proven biologically necessary, the board may utilize a temporary permit system that identifies active traps in specific cases or modify the list of trails in the setback system. In areas that permit off-leash dog use, dogs must still be under voice and sight control to be protected by this setback. For the protection of users and wildlife, dogs must be in voice and sight control in all multi-use settings.

Finally, defining the trail would not pose a regulatory burden, as the trails are mapped and the same process for identifying the trail boundaries and regulating trap setbacks in Units 1C and 15C could be applied to Unit 14.

[1] 2022 RC014

What is the issue you would like the board to address and why? While the majority of trappers set traps a responsible distance from multi-use trails, some traps on/near Mat Su area trails and trailheads have incurred serious consequences for skiers, bikers, and walkers with pets. This issue was brought to the Matanuska-Susitna Borough (MSB) Assembly in 2017, when over 3,500 MSB residents petitioned assembly members to protect multi-use trails after 11 dogs had been caught in traps on local trails. The MSB approved trapping restrictions on six borough-managed trails and on school grounds, but did not issue regulations for state-managed trails in deference to the regulatory powers of the Board of Game. While the borough regulations limited trapping on a few

trails in 2017, each year since there have been reports of pets in off-leash areas being caught and even killed in legally set traps on/near multiuse trails.

Land managers and law enforcement do not track trap-safety incidents, so reports are collected ad hoc and considered incomplete. Since 2019, Alaska Wildlife Alliance started tracking the incidents reported to our organization, and transitioned the reporting platform online so the public could see when a trap encounter was reported on an interactive map (www.akwildlife.org/safetrails).

Many people live in Alaska for the year-round recreational activities, and tens of thousands of people in the MSB and surrounding areas enjoy multi-use trails during the trapping season. We respect the rights of trappers to utilize multi-use trails, and seek reasonable, regulated boundaries that ensure safe multi-use on some trails for the benefit of thousands of other trail users. The goal of this proposal is not to unduly restrict trapping, but to protect and reduce the uncertainty for users of multi-use trails by providing defined boundaries on trap placement.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The setback conditions and trail recommendations in this proposal were negotiated by representatives present at the 2022 stakeholder meeting. Alaska Trappers Association (ATA) was presented with a draft of this proposal before submission, but ATA has not decided whether to support or oppose or amend this proposal before it was submitted.

PROPOSED BY: Alaska Wildlife Alliance	(EG-F24-087)
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PROPOSAL 83

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

Extend the spring hunting season for ptarmigan in Unit 16 as follows:

Option 1

Unit	Season	Bag Limit
16	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
16	August 10 – March 31	10 ptarmigan per day, 20 in possession
16	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Unit 16 to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Unit 16 ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17- 26 to do so. This would also allow individuals living in the region to take advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Unit 16 by one month would be unlikely to cause a negative impact on the population. In the alternative, any potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.

PROPOSAL 84

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

Extend the spring hunting season for ptarmigan in Units 14A and 14B as follows:

Option 1

Unit	Season	Bag Limit
14A, 14B	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
14A, 14B	August 10 – March 31	10 ptarmigan per day, 20 in possession
14A, 14B	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Units 14A and 14B to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Units 14A and 14B ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17-26 to do so. This would also allow individuals living in the region to take advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Units 14A and 14B by one month would be unlikely to cause a negative impact on the population. In the alternative, any

potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.