

*The enclosed proposal book has been updated with the addition of proposal #43, which was inadvertently omitted from the original book, and the updated agenda and board member roster.*

---

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526



**THE ALASKA BOARD OF GAME  
SPECIAL MEETING ON COPPER BASIN AREA  
MOOSE AND CARIBOU HUNTING  
PROPOSAL BOOK**

**The enclosed proposals will be considered at the  
Board of Game meeting scheduled for March 18-21, 2017 in  
Glennallen, Alaska.**

**The Alaska Department of Fish and Game administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.**

**If you believe you have been discriminated against in any program, activity, or facility, or if you desire further information please write to ADF&G, P.O. Box 115526, Juneau, AK 99811-5526; U.S. Fish and Wildlife Service, 4040 N. Fairfax Drive, Suite 300 Webb, Arlington, VA 22203; or O.E.O., U.S. Department of the Interior, Washington DC 20240.**

**For information on alternative formats for this and other department publications, please contact the department ADA Coordinator at (VOICE) 907-465-6077, (TDD) 1-800-478-3648 or 907-465-3646, or (FAX) 907-465-6078.**



## Alaska Board of Game

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

### REVIEWER LETTER PLEASE READ CAREFULLY

Dear Reviewer,

January, 2017

The Alaska Board of Game will consider the attached book of regulatory proposals at its meeting scheduled for **March 18-21, 2017**. The proposals concern changes to hunting regulations for caribou and moose in Units 11, 12 and 13. Proposals were submitted by members of the public, organizations, and fish and game advisory committees. With the exception of minor edits, the proposals are published essentially as they were received.

The proposals are presented as brief statements summarizing the intended regulatory changes. In cases where confusion might arise or where the regulation is complex, proposed changes are also indicated in legal format. In this format, bolded and underlined words are **additions** to the regulation text, and capitalized words in square brackets are [DELETIONS].

**Public Comment Requested:** Before taking action on these proposed changes to the regulations, the board would like your written comments and/or oral testimony on any effects the proposed changes would have on your activities.

The board relies heavily on written comments and oral testimony explaining the effect of the proposed changes. Public comment, in combination with advisory committee comments and ADF&G staff reports provide the Board of Game with useful biological and socioeconomic data to form decisions. Written comments can be submitted:

Online: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

Fax: 907-465-6094

Mail: ADF&G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526  
Juneau, AK 99811-5526

**Timely Submission:** Written comments are encouraged to be submitted by the set deadline for the meeting. Comments received by the deadline are provided to the board and the public on the meeting information website in advance of the meeting. Written comments will be accepted after the deadlines via fax and mail only, and will be provided to board members at the meeting. Comments are accepted in person during board meetings and need to include 20 paper copies. All meeting materials, including written comments, are uploaded to the meeting information website and distributed to board members, agency staff, and the public during the meeting.

**Tips for Providing Written Comments:**

- Clearly state the proposal number and your position by indicating “support” or “oppose” to the proposal(s). If the comments support a modification in the proposal, please indicate “support as amended” and provide your preferred amendment in writing.
- Include your name and if including graphs or charts, please indicate the source.
- Briefly explain why you support or oppose the proposal. The board benefits greatly from understanding the pros and cons of each issue. Board actions are based on a complete review of the facts involved, not the sum of total comments for or against a proposal.
- Keep comments brief. Clearly stating proposals and one’s position with supporting rationale will be helpful for the board members.
- Page limits: For on-time comments, the board will accept up to 100 single-sided pages from any one individual or grouping. For comments received after the on-time period or during the meetings, comment is limited to ten single-sided pages.
- If making comments on more than one proposal, please do not use separate pieces of paper. Simply begin the next set of written comments by listing the next proposal number.
- Write clearly, use dark ink and write legibly. Comments will be scanned and photocopied so please use 8 1/2" x 11" paper and leave reasonable margins.

**Advisory Committees:** In addition to the above, please make sure advisory committee (AC) meeting minutes reflect why the AC voted as it did. If the vote was split, include the minority opinion. A brief description consisting of a couple of sentences is sufficient. Detail the number of members in attendance (e.g., 12 of 15 members) and indicate represented interests such as subsistence, guides, trappers, hunters, wildlife viewers, and others. AC members are strongly encouraged to use the format prescribed by the board, and provided by Boards Support regional coordinators. For more information on providing recommendations on proposals and testimony during board meetings, refer to the AC manual available online and from Boards Support Section.

Meeting information, documents, and a link to the audio is available through the Board of Game website at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov) or through ADF&G Boards Support Section. Preliminary board actions will also be posted on the website during the meeting, followed by final actions after the meeting.

Persons with a disability needing special accommodations in order to comment on the proposed regulations should contact the Boards Support Section at (907) 465-4110 at least two weeks prior to the scheduled meeting to make any necessary arrangements.

Thank you for your interest and involvement with the Board of Game and the regulatory process.

Sincerely,

Kristy Tibbles, Executive Director  
Alaska Board of Game

**ALASKA BOARD OF GAME  
SPECIAL MEETING ON COPPER BASIN AREA  
MOOSE AND CARIBOU HUNTING  
PROPOSAL BOOK**

TABLE OF CONTENTS

<u>INTRODUCTION SECTION</u>	<u>PAGE NUMBER</u>
Reviewer Letter.....	i-ii
Table of Contents .....	iii-v
2016/2017 Meeting Schedule .....	vi
Board of Game Membership Roster .....	vii
Boards Support Section Staff.....	viii
Meeting Agenda.....	ix
Proposal Section.....	1-32

**The following list of proposals to be considered at the March 2017 Board of Game meeting is sorted by general topic. A final order of proposals for board deliberation (roadmap order) will be developed and distributed closer to the meeting date.**

<u>PROPOSAL NUMBER</u>	<u>SUBJECT</u>	<u>PAGE NUMBER</u>
1	Modify the amount reasonably necessary for subsistence for moose.	1
2	Eliminate the community subsistence harvest hunts.	2
3	Eliminate the community subsistence harvest hunts.	3
4	Eliminate the community subsistence harvest hunts.	3
5	Eliminate the community subsistence harvest hunts.	3
6	Eliminate the community subsistence harvest hunts.	4
7	Eliminate the community subsistence harvest hunts.	4
8	Eliminate the community subsistence harvest hunt for moose.	4
9	Eliminate the community subsistence harvest hunt for moose and allocate permits within the Unit 13 subunits based on population.	5
10	Eliminate the community subsistence harvest hunt for moose.	5
11	Eliminate the community subsistence harvest hunt for moose.	6

12	Eliminate the community subsistence harvest hunt for moose.	6
13	Eliminate the community subsistence harvest hunt for moose.	6
14	Eliminate the community subsistence harvest hunt and the December registration moose hunt, and modify the number of available drawing permits.	7
15	Eliminate the community subsistence harvest hunts, or change season dates and eliminate “any bull” tags.	8
16	Eliminate the community subsistence harvest moose hunt, or modify the season and bag limit.	8
17	Change the season dates for the community subsistence harvest moose hunt.	9
18	Eliminate or change season dates of the community subsistence harvest moose hunt.	9
19	Modify the community subsistence harvest moose hunts.	10
20	Replace the community subsistence harvest moose hunt with a Tier II moose season.	10
21	Eliminate the community subsistence harvest moose hunts and replace with a Tier II or registration moose season.	11
22	Eliminate the community subsistence harvest hunts for moose, and adopt a resident "any bull" registration hunt.	11
23	Eliminate the community subsistence harvest moose hunt.	12
24	Clarify the communities eligible for the “100 bull” quota and extend the season.	13
25	Eliminate the community subsistence harvest hunt for moose, or require hunters to choose subsistence or general hunt and restrict the hunt area.	14
26	Change the antler restrictions for the general seasons moose hunt in Unit 13.	15
27	Change the antler restrictions for the general season moose hunt in Unit 13.	15
28	Change the antler restrictions for the general season moose hunt in Unit 13.	15
29	Close the nonresident moose season in Unit 13.	16
30	Eliminate the community subsistence harvest hunt for caribou.	16
31	Eliminate the community subsistence harvest hunt for caribou.	17
32	Change the eligibility criteria for Tier I caribou and moose hunts in Unit 13.	17
33	Eliminate the caribou community subsistence harvest hunt, Tier I and drawing hunts, and the requirement to hunt moose in Unit 13; replace with a registration hunt period system.	18
34	Eliminate the community subsistence harvest hunt for caribou, increase the number of caribou household Tier I permits, and shorten the season.	21
35	Eliminate the community subsistence harvest moose hunt and remove the requirement for Tier I caribou hunters to hunt moose in Unit 13.	22

36	Increase the bag limit for the caribou community harvest hunt and clarify the communities eligible for receiving the 300 caribou quota.	22
37	Lengthen the caribou season, increase winter caribou bag limit, and establish a youth hunting season.	23
38	Eliminate drawing hunt for caribou in Unit 13, and remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13.	23
39	Remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13.	24
40	Remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13.	24
41	Shorten the season dates for the Unit 13 caribou draw hunt, and remove the requirement that Unit 13 Tier I caribou hunters to hunt moose in Unit 13	25
42	Change the dates for the Unit 13 caribou draw season.	25
<b><i>The following proposal was inadvertently omitted from the original proposal book.</i></b>		
43	Eliminate the community subsistence harvest hunt for moose, lengthen the general season and adopt an “any bull” registration permit.	25-32



**Alaska Board of Game**

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

www.boardofgame.adfg.alaska.gov

**ALASKA BOARD OF GAME  
2016/2017 Cycle  
Tentative Meeting Dates & Locations**

<b>Meeting Dates</b>	<b>Topic</b>	<b>Location</b>	<b>Comment Deadline</b>
<b>January 5, 2017</b> (1 day)	<b>Work Session</b>	<b>Bethel</b> Yupit Piciryarait Cultural Center	<b>December 22, 2016</b>
<b>January 6-9, 2017</b> (4 days)	<b>Arctic &amp; Western Region</b> (Units 18, 22, 23, and 26A)	<b>Bethel</b> Yupit Piciryarait Cultural Center	<b>December 22, 2016</b>
<b>February 17-25, 2017</b> (9 days)	<b>Interior &amp; Northeast Arctic</b> (Units 12, 19, 20, 21, 24, 25, 26B, and 26C)	<b>Fairbanks</b> Pike's Waterfront Lodge	<b>February 3, 2017</b>
<b>March 18 – 21, 2017</b> (4 days)	<b>Special Meeting on Copper Basin Area Moose and Caribou Hunting</b> Units 11, 12, & 13	<b>Glennallen</b> Alaska Bible College	<b>March 3, 2017</b>

Total Meeting Days: 17

2017/2018 Cycle Proposal Deadline: Monday, May 1, 2017

*Updated December 28, 2016*



**Alaska Board of Game**

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

**BOARD OF GAME MEMBERS**

<b><u>NAME AND ADDRESS</u></b>	<b><u>TERM EXPIRES</u></b>
Ted Spraker, Chair 49230 Victoria Ave. Soldotna, AK 99669	6/30/2020
Nathan Turner, Vice Chair P.O. Box 646 Nenana, AK 99760	6/30/2019
Stosh (Stanley) Hoffman P.O. Box 2374 Bethel, AK 99559	6/30/2020
Teresa Sager Albaugh HC 72 Box 835 Tok, AK 99780	6/30/2018
David Brown P.O. Box 491 Wrangell, AK 99929	6/30/2017
Karen Linnell P.O. Box 8 Glennallen, AK 99588	6/30/2019
Larry Van Daele 3401 Antone Way Kodiak, AK 99615-7124	6/30/2018

\*\*\*\*\*

Alaska Board of Game members may also be reached through:

ALASKA DEPARTMENT OF FISH AND GAME

Boards Support Section

P.O. Box 115526, Juneau, AK 99811-5526

(907) 465-4110 PHONE

(907) 465-6094 FAX

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

Kristy Tibbles, Executive Director, Alaska Board of Game

e-mail: [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov)

## BOARDS SUPPORT SECTION STAFF LIST

Alaska Department of Fish and Game  
Mailing address: P.O. Box 115526, Juneau, AK 99811-5526  
Physical location: 1255 West 8th Street  
Phone: (907) 465-4110; Fax: (907) 465-6094

---

### HEADQUARTERS

#### Board of Fisheries

**Glenn Haight**, Exec. Director II, 465-6095  
**Jessalynn Rintala**, Pub. Specialist II, 465-6097

#### Board of Game

**Kristy Tibbles**, Exec. Director I, 465-6098  
**Lena Gilbertson**, Pub. Specialist II, 465-4046

**Krista Messing** Administrative Assistant I, 465-6084

### REGIONAL OFFICES

#### Southeast Region (North of Frederick Sound)

**Lena Gilbertson**  
P.O. Box 115526  
Juneau, AK 99811-5526  
Phone: 465-4046  
Fax: 465-6094

#### Western Region

**Jen Peeks**  
P.O. Box 1467  
Bethel, AK 99559  
Phone: 543-1678  
Fax: 543-2021

#### Southeast Region (South of Frederick Sound)

**Jessalynn Rintala**  
P.O. Box 115526  
Juneau, AK 99811-5526  
Phone: 465-6097  
Fax: 465-6094

#### Arctic Region

**Vacant**  
P.O. Box 689  
Kotzebue, AK 99752  
Phone: 442-1717  
Fax: 442-2420

#### Southcentral Region

**Sherry Wright**  
333 Raspberry Road  
Anchorage, AK 99518-1599  
Phone: 267-2354  
Fax: 267-2489

#### Interior Region

**Nissa Pilcher**  
1300 College Road  
Fairbanks, AK 99701-1599  
Phone: 459-7263  
Fax: 459-7258

#### Southwest Region

**Taryn O'Connor-Brito**  
P.O. Box 1030  
Dillingham, AK 99576  
Phone: 842-5142  
Fax: 842-5514

**ALASKA BOARD OF GAME**  
**Special Meeting on Copper Basin Area**  
**Moose and Caribou Hunting**  
**Alaska Bible College, Ball Memorial Library**  
**Ridley Circle, Glennallen, Alaska**  
**March 18-21, 2017**

**TENTATIVE AGENDA**

**NOTE: This Tentative Agenda is subject to change throughout the course of the meeting.**

This Tentative Agenda is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this tentative agenda but is not constrained by it.

**Saturday, March 18, 2017, 11:00 AM**

**OPENING BUSINESS**

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

**AGENCY AND OTHER REPORTS**

**PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY** upon conclusion staff reports

**THE DEADLINE TO SIGN UP TO TESTIFY will be 10:00 a.m. Sunday, March 19.** 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.

**Sunday, March 19, 2017, 9:00 AM**

**PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY**

**BOARD DELIBERATIONS** upon conclusion of oral public testimony

**Monday, March 20, 2017, 8:30 AM**

**BOARD DELIBERATIONS** continued

**Tuesday, March 21, 2017, 8:30 AM**

**BOARD DELIBERATIONS** continued/concluded

**MISCELLANEOUS BUSINESS**, including petitions, findings, resolutions, letters, & other business  
**ADJOURN**

**Agenda Notes**

- A. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting the ADF&G Boards Support Office in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-4110 no later than March 3, 2017 to make any necessary arrangements.

*Note: The board does not have the ability to take action with regard to Unit 20 as it was not in the Call for Proposals for this meeting.*

**PROPOSAL 1 - 5 AAC 99.025. Customary and traditional uses of game populations.** Modify the amount reasonably necessary for subsistence for moose by adding a new section as follows:

99.25 (a) (8) Moose

**Parts of Units 11, 12, 13 and 20A included in the area described in 5 AAC 92.074(d); positive; 100 bull moose that do not meet antler size restrictions for other resident hunts in the area for the community representing the eight villages identified in 5 AAC 92.074(d).**

**What is the issue you would like the board to address and why?** Amend the amount necessary for subsistence (ANS) moose determination for the portion of units in the area described in 5 AAC 92.074(d) to include a specific finding for the amount of “any bull” moose necessary for subsistence for the communities that are authorized to participate in the community subsistence hunt in the area.

Ahtna Tene Nene’ has submitted companion proposals requesting that 5 AAC 92.072 and 92.074(d) be amended to require the board to specifically approve and identify in regulation all of the communities that are eligible to participate in the community subsistence harvest (CSH) for the area described in 92.074(d). Ahtna Tene Nene’ proposes that each community proposing a CSH under 92.072 and .074 identify its area of customary and traditional (C&T) use, the community’s C&T pattern of community-based subsistence use in the area, the ANS for the community and the hunting opportunity necessary to provide the community a reasonable opportunity. If the board finds that a community meets the conditions for establishing a CSH, it would adopt a regulation describing the CSH area for the community and the ANS and reasonable opportunity for that community within the area described as a new part of 92.074.

If the board approves these proposals and amends the regulations accordingly, the eight villages named in 5 AAC 99.074(d) which originally established the area, the C&T use pattern for the CSH in the area, the 100 “any bull” quota amount necessary for subsistence, and the season necessary to provide the eight villages a reasonable opportunity, would be identified as eligible for the CSH in the area. Eight villages jointly established the CSH, but all eight are united as one “community” for the purposes of the C&T use pattern upon which the CSH is founded and for administering the CSH for the participating households in the eight villages. Therefore, under the Ahtna Tene Nene’ proposal, only one “community” representing all eight villages would be eligible to hunt in the area described in 92.074(d) – which is the traditional hunting area for the eight villages.

If these original eight communities are the only communities the board approves for this area, the ANS would, consistent with past board findings and regulations, be 100 “any bulls” and the quota would remain 100 “any bulls”. If the board approves additional communities for the area described in 5 AAC 92.074(d), the board will have to make a separate determination of the ANS for the additional communities, as well as the season the additional community’s needs (season for example) for a reasonable opportunity. The board and department cannot merely assume that

the ANS or reasonable opportunity is the same for each community that proposes or applies to be part of the CSH established by the eight villages.

If the board rejects the Ahtna Tene Nene’ proposals to amend the CSH regulations, and continues to allow any group of 25 or more persons to participate in the CSH authorized by 5 AAC 92.074(d), it must adopt an ANS for the CSH that reflects an ANS for the total number of households authorized to participate in the moose hunt.

If the ANS adopted for the CSH “any bull” population under any scenario exceeds the allowable any bull harvest for the area, the board and department must establish a Tier II hunt for the CSH. Tier II applicants would be limited to only those communities and member households that are eligible for the CSH moose hunt authorized for the area described in 92.074(d).

**PROPOSED BY:** Ahtna Tene Nene’ (EG-F16-166)  
\*\*\*\*\*

**PROPOSAL 2 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts as follows:

Cancel the community hunt in Unit 13 for moose and caribou as currently regulated; effective January 1, 2017.

**What is the issue you would like the board to address and why?** The community subsistence hunt in Unit 13. Its original intent is not being met because the number of participants has increased to the point that there is no distinction between the CSH hunt and the regular season hunt. It is getting out of hand for the department to monitor and administer, and the quality of the hunt has diminished for reasons of too many people and the associated problems that come with that including:

1. Not enough enforcement/department personnel to see that the rules and regulations are being complied with. Many known instances of sublegal moose shot, fear of many more being taken over limit and sublegal and not turned in. Wildlife Troopers in Glennallen reported 17 sub-legal moose that were turned in or caught (doesn't include those from Palmer, Cantwell or Delta). There were also six-nine sublegal moose found killed along the highway and left in Unit 13. How many more are being left in the field? The hunt was originally intended for a small number of local participants that could be closely monitored and has turned in to a unmanageable mess.
2. Too many people all over, trash along highways and trails, toilet paper and human waste near turn outs and parking areas.
3. The large number of people is impacting all other species that are taken as a sideline while moose and caribou hunting.

**PROPOSED BY:** Copper Basin Fish and Game Advisory Committee (EG-F16-144)  
\*\*\*\*\*

**PROPOSAL 3 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts as follows:

Repeal the current community subsistence harvest hunt for the Copper Basin area. Default back to the old general season moose hunt: September 1 through September 20, spike-fork, four brow lines, 50-inches.

The “any bull” surplus portion would go to the draw system, for all Alaskans.

**What is the issue you would like the board to address and why?** The current community subsistence hunt for the Copper Basin area. This hunt has not met its intended expectation, and has grown into the new general season hunt with an early opener and an attractive “any bull” allocation. Managing this hunt is also adding a much larger than expected additional work load to the department staff. If you take into consideration all the current opportunity that exist for the Ahtna people, a 20 day general season State hunt, a 50 day fall hunting season for federally qualifying rural resident hunters, for any bull moose and two caribou, along with 1.7 million acres of private lands to hunt, that this would meet the interpretation of reasonable opportunity.

**PROPOSED BY:** Anchorage Fish and Game Advisory Committee (EG-F16-138)

\*\*\*\*\*

**PROPOSAL 4 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts as follows:

No community harvest. Same rules, same time, same regulations as everyone else.

**What is the issue you would like the board to address and why?** Eliminate the community harvest. The system is being taken advantage of.

**PROPOSED BY:** Carl Hiers (EG-F16-112)

\*\*\*\*\*

**PROPOSAL 5 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts as follows:

This hunts should be eliminated.

**What is the issue you would like the board to address and why?** The community subsistence hunts.

**PROPOSED BY:** Terry Harling (EG-F16-126)

\*\*\*\*\*

**PROPOSAL 6 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts as follows:

Take out the community subsistence hunt. Go back to regular subsistence hunt tags.

**What is the issue you would like the board to address and why?** The community subsistence hunt. It's a slaughter house. It needs to be one tag per person for caribou and moose each. The community subsistence hunt, if you've ever seen, it should be taken out of regulations. People are taking advantage of it and not using it for what it was meant for.

**PROPOSED BY:** Melody Callaghan (EG-F16-124)  
\*\*\*\*\*

**PROPOSAL 7 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts as follows:

Get rid of community hunts. If you are going to make a community hunt make it for all the units. It's not fair that people that live in Kodiak, Seldovia, Homer and many other places can say Unit 13 is in their community.

**What is the issue you would like the board to address and why?** It's destroying Unit 13 I have hunted the area since 1996 and I've have never seen the bull numbers drop like they have in the last five years. I know for a fact that people are lying on the application and lying when it comes to recording their moose. I've had people tell me they get it just so they can shoot the first bull they see and head home. It's called hunting not shooting. I just want there to be moose still there so my kids have moose to hunt. There needs to be more follow ups on people applying.

**PROPOSED BY:** Travis Lamont O'Brien (EG-F16-113)  
\*\*\*\*\*

**PROPOSAL 8 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose as follows:

We would like to propose that the community subsistence harvest (CM300) be eliminated and removed from the books. We feel that as these areas are in a harvest ticket and unregulated hunt areas for bull moose (GM000), that this meets the need that everyone has an opportunity to harvest a moose; that also there is the drawing moose (DM324) that the 100 "any bull" harvest objective could be added to and issued as a subunit drawing, to give everyone the opportunity to apply for the any bull drawing permits. Also there is the antlerless drawing moose hunt (DM325) available and the nonresident drawing moose (DM335-339) for nonresident opportunity.

**What is the issue you would like the board to address and why?** The community hunt has gotten out of hand and is hard to maintain and is unnecessary, the any bull permit reporting is

inaccurate, the reporting system allowed for 11 “any bull” moose above the quota to be harvested in Unit 13E. This is unacceptable and very confusing.

**PROPOSED BY:** Denali Fish and Game Advisory Committee (EG-F16-146)

\*\*\*\*\*

**PROPOSAL 9 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose and allocate permits within the Unit 13 subunits based on population as follows:

I propose shutting down the Unit 13 community harvest moose hunt completely. I think it should remain closed until a population survey is conducted throughout the unit and possibly adjacent subunits to ensure there is adequate numbers of moose traveling through the unit to even allow a subsistence hunt like this to take place. Even when the population is concluded to be sufficient I then propose that the permits are divided into the Unit 13 subunits proportionally to the population of moose in that area. I absolutely believe this is a high priority issue for the sake of the moose population stability in the most heavily hunted unit in the state of Alaska. Thank you.

**What is the issue you would like the board to address and why?** The issue I personally have is with the Unit 13 community harvest moose hunt. My family and I hunt in Unit 13D. Since the community harvest moose hunt began, it has brought in bigger numbers of hunters into the area and I believe they are taking advantage of the number of tags received for the hunt. One group of hunters admitted taking six bull moose from an area of about 12 square miles, all through one community harvest group. Now this is only one group of hunters. Now I know not everyone abuses hunting areas but why even make it possible for this to happen.

**PROPOSED BY:** Dylan Berg (EG-F16-129)

\*\*\*\*\*

**PROPOSAL 10 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose as follows:

Completely eliminate this hunt.

**What is the issue you would like the board to address and why?** Eliminate the community harvest hunt for moose in Unit 13. This hunt was supposed to help local subsistence hunters, but has only brought in hundreds of hunters from all over the state. The local hunters cannot compete with these hunters.

**PROPOSED BY:** Lee Adler (EG-F16-140)

\*\*\*\*\*

**PROPOSAL 11 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence hunt for moose as follows:

Eliminate the CM300 community hunt.

**What is the issue you would like the board to address and why?** It is not right that so few can decimate the moose population without any thought to hunting ability or thought of what is a legal animal, while so many others are held to a very suppressive high standard of animal evaluation for legal requirements. Is it fair for community hunters to kill and terrorize the moose herd before regular moose season and all the way through regular moose season? Do the right thing and disregard special interest groups, and benefit the good of the majority of Alaska residents who purchase hunting licenses. Are we not one actual community across the state?

**PROPOSED BY:** Ronald Faulkner (EG-F16-152)

\*\*\*\*\*

**PROPOSAL 12 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose as follows:

I propose shutting down the Unit 13 community harvest moose hunt. Do away with community hunt which will increase opportunity for individual hunters.

**What is the issue you would like the board to address and why?** Not enough moose for individual hunters in Unit 13.

**PROPOSED BY:** Adam Durland (EG-F16-135)

\*\*\*\*\*

**PROPOSAL 13 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose as follows:

No community hunts would allow ADF&G to issue out more draw tags for any bull. Too many people have problems judging 50-inch antlers.

**What is the issue you would like the board to address and why?** Community hunts need to end! People are just taking advantage of the longer season and not having to follow the normal antler restriction rules.

**PROPOSED BY:** Travis Price (EG-F16-116)

\*\*\*\*\*

**PROPOSAL 14 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt and the December registration moose hunt, and modify the number of available drawing permits as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence Open Season and General hunts)</b>	<b>Nonresident Open Season</b>
Unit 13 1 moose per regulatory year, only as follows: [1 BULL PER HARVEST REPORT BY COMMUNITY HARVEST PERMIT ONLY HOWEVER, NO MORE THAN 100 BULLS THAT DO NOT MEET ANTLER RESTRICTIONS FOR OTHER RESIDENT HUNTS IN THE SAME AREA MAY BE TAKEN IN THE ENTIRE COMMUNITY HARVEST AREA DURING THE AUG. 10 - SEPT. 20 SEASON; OR]	[AUG. 10 - SEPT. 20 DEC. 1 - DEC. 31; (SUBSISTENCE HUNT ONLY)]	
1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side; or [1 BULL, BY REGISTRATION PERMIT ONLY; OR ]	Sept. 1 - Sept. 20 (General <b>and Subsistence</b> hunt only)  [DEC. 1 - DEC. 31 (SUBSISTENCE HUNT ONLY)]	
1 antlerless moose by drawing permit only; up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or 1 bull moose by drawing permit only; up to <b>100</b> [5] permits may be issued;	Oct. 1 - Oct. 31 Mar. 1 - Mar. 31 (General <b>and Subsistence</b> hunt only) Sept. 1 - Sept. 20 (General <b>and Subsistence</b> hunt only)	
1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to <b>100</b> [150] permits may be issued on or after July 1 [, 2016]		Sept. 1 - Sept. 20

**What is the issue you would like the board to address and why?** The community subsistence harvest system is getting out of hand and appears to be unnecessary. Harvest and population data from ADF&G suggest reasonably necessary traditional needs are being met for federally

qualifying Unit 11, 12 and 13 residents. Those qualifying residents are allowed one federal subsistence “any bull” permit plus two federal subsistence caribou permits for hunting in roughly 4 million acres or 28% of land in Unit 13. In addition 1.3 million acres (9% of Unit 13) are posted ANSCA lands which provide exclusive use by Ahtna members through state general and subsistence hunts.

Since the board has determined that there are enough moose in the Unit 13 population to allow nonresident participation, one must conclude the number of moose is now large enough that state resident subsistence needs are being met. Thus Tier II hunts are also unnecessary.

As a cautionary step, we propose a reduction in the “up to” language for number of nonresident 50-inch/ 4-brow-tine permits. Reducing the maximum number to 100 permits allows a slower reintroduction of nonresidents into the Unit 13 moose hunt. While increasing the number of resident-only “any bull” permits to 100 will ensure resident needs will be met before nonresidents.

**PROPOSED BY:** Matanuska-Susitna Fish and Game Advisory Committee (EG-F16-142)

\*\*\*\*\*

**PROPOSAL 15 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunts, or change season dates and eliminate “any bull” tags as follows:

End the community hunt in Unit 13 or at least change season dates to that of general season and end “any bull” tags as well.

**What is the issue you would like the board to address and why?** I believe the community hunt in all of Unit 13 needs to be halted permanently. The people I see taking advantage of this hunt are not in any way hunting for subsistence. They are driving new vehicles with new wheelers in tow. I firmly believe that with Unit 13 (all of), the state should go back to general season regulation for everyone across the board. If the state for some reason felt they needed some sub 50 inch bulls harvested, there could always be a draw for “any bull” tags. There are no real villages that aren’t connected to the road system in Unit 13. If community hunters continue to harvest it will be ruined for everyone.

**PROPOSED BY:** Casey Allik (EG-F16-122)

\*\*\*\*\*

**PROPOSAL 16 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.072. Community subsistence harvest hunt area and permit conditions.** Eliminate the community subsistence harvest moose hunt or modify the season and bag limit as follows:

- 1) Cancel this hunt all together.
- 2) Rewrite opening day as the same as regular season hunters of September 1.
- 3) Bag limit should be restricted to one moose per group with the meat distributed by group leader.

**What is the issue you would like the board to address and why?** 1) Unit 13 moose count has been decimated by the community hunt. 2) Community subsistence harvest opening. The opening day for this should be the same as all regular season hunters in all fairness. 3) Bag limit for each group should be limited so the species is not decimated as it now has been.

**PROPOSED BY:** George Pederson (EG-F16-143)  
\*\*\*\*\*

**PROPOSAL 17 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the season dates for the community subsistence harvest moose hunt as follows:

Community harvest moose season: November 15 to November 20 or by emergency order.

**What is the issue you would like the board to address and why?** Community hunters should not be allowed to hunt moose in the sport hunt season. I have hunted an area for over 30 years and have come across hunting camps that have both community hunters and sport hunters in it, they shoot any and all size bulls if it's an undersized bull they put it on a community harvest tag and large bulls they put on sport license tag. The bull moose population I know has taken a big drop the last five years, I hunt the 20 day moose season and we use to see lots of bulls both big and small but since community harvest began very, very few if any at all. We have also counted the under-sized moose they have taken and check the community harvest counts and they don't add up so we know there are many community harvest moose taken and not reported.

**PROPOSED BY:** Jeffrey Berg (EG-F16-130)  
\*\*\*\*\*

**PROPOSAL 18 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate or change season dates of the community subsistence harvest moose hunt as follows:

The community hunt should be eliminated or at the very least opened after the regular season since the individual sportsman has restrictions on what they can harvest.

**What is the issue you would like the board to address and why?** Unit 13 has a community hunt that allows hunters to take any bull before regular season starts for individual sport hunters. When a hunter applies and gets a Tier I caribou they can only hunt moose in Unit 13. Unit 13 receives a lot of pressure from the community hunt, Tier I restriction and the individual sportsman. It equals the 90's where there was a winter hunt in Unit 14 for spike-fork and snow machines and four-wheelers could go anywhere, it hit the moose hard.

**PROPOSED BY:** Vern Cordell (EG-F16-133)  
\*\*\*\*\*

**PROPOSAL 19 - 5 AAC 85.045. Hunting seasons and bag limits for moose; 92.050. Required permit hunt conditions and procedures; and 92.052. Discretionary permit hunt conditions and procedures.** Modify the community subsistence harvest moose hunts as follows:

1. If in a community harvest, they can only hunt August 10-25.
2. If signed up in a community harvest hunt, they cannot hunt general season for moose.
3. Destroy trophy value of antlers.
4. Up the limit a few animals on DM300 and DM325 and do away with CSH.

**What is the issue you would like the board to address and why?** The community harvest moose is causing the moose population of legal bulls in Unit 13 to decline. These hunters are claiming community harvest in order to hunt 12 extra days and killing everything in sight. Most hunters I've come across that are part of a CSH group stay in the field thru the end of the season causing added pressure and stress on all game and other hunters. They are signed up for the give me moose and it's not regulated closely enough by ADF&G and AST due to lack of man power.

**PROPOSED BY:** Dan Berg (EG-F16-128)

\*\*\*\*\*

**PROPOSAL 20 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Replace the community subsistence harvest hunt for moose with a Tier II moose season as follows:

Unit 13 - 100 any bulls permits, one per household, Tier II subsistence permits.

Subsistence moose - Tier II, general season antler requirements during this season, August 20 to September 20.

Season: August 20 to September 20

**What is the issue you would like the board to address and why?** Unit 13 Tier II subsistence moose permits. The board is considering altering the community subsistence moose hunt in Unit 13 to make it more manageable, provide for subsistence and to distinguish among subsistence users per AS 16.05.258:

- (1) The customary and direct dependence on the game population by the subsistence user for human consumption as a mainstay of livelihood; and
- (2) the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated.

A possible replacement for the community subsistence moose hunt in Unit 13 is to distribute the 100 "any bull" permits using a Tier II point system. Only one "any bull" permit will be allocated per household.

In addition to the "any bull" permits, subsistence permits will be issued to qualified applicants for the taking of moose with general season antler requirements during this season August 20 to September 20.

Tier II is used in other areas such as in the Susitna River drainage for subsistence bull hunts. This will solve the concern over the number of CSH groups and meeting customary and traditional uses for subsistence.

**PROPOSED BY:** Van Putman (EG-F16-155)

\*\*\*\*\*

**PROPOSAL 21 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest moose hunts, and replace with a Tier II or registration moose season as follows:

Elimination of the community subsistence moose harvest program in Units 11, 12, and 13. Replace the program with either a Tier II moose hunt or a registration moose hunt with registration held locally.

**What is the issue you would like the board to address and why?** Multiple problems with community subsistence moose harvest program ; lack of harvest by local users, and overcrowding of the hunt area.

**PROPOSED BY:** James Holmes (EG-F16-154)

\*\*\*\*\*

**PROPOSAL 22 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.050 Required permit hunt conditions and procedures.** Eliminate the community subsistence harvest hunts for moose, and adopt a resident "any bull" registration hunt as follows:

AOC recommends deleting the CSH moose permit hunts (CM300) and adopting a resident registration permit hunt in Units 13 and 11 for "any bull".

**RESIDENT HUNTERS:**

1 any bull moose per harvest report by Registration Permit  
Harvest Reports due within 5 days of harvest.  
Open season; August 25th - Sept. 20. Dec. 1st - Dec. 31st.  
(Subsistence hunt only)

The any-bull moose harvest will be closed by Emergency Order when the harvest objective of 100 bulls (by subunit) are met. Unsuccessful registration permit holders may then continue to hunt under spike-fork antlers or 50-inches with 4 brow tines regulations in Unit 13 and under spike-fork antlers or 50-inches with three or more brow tines regulations in Unit 11.

Bag limit - one bull moose per household every three regulatory years. The board, based on plenty of moose harvest data, both state and federal, 5 AAC 99.025, and population counts, can determine that current moose hunting opportunity under 5 AAC 99.025(c) is providing a reasonable opportunity for subsistence uses of moose within the Gulkana, Cantwell, Chistochna, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) community harvest area. That decision by the board would be consistent with the state

subsistence law, AS 16.05.258(b)(1)(A) without the need of any CSH opportunity in the Copper Basin.

Any-bull moose registration permit holders are prohibited from participating in any other state moose hunts for the regulatory year. No restrictions on participating in state general or subsistence hunts for moose when not participating in the any-bull moose registration permit hunt in Unit 13 or 11.

**What is the issue you would like the board to address and why?** The board's goal in adopting 5 AAC 92.074(d) was to assure eight Ahtna communities that their members would be provided perpetual reasonable opportunity for subsistence uses of moose and caribou within the Gulkana, Cantwell, Chistochna, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community harvest area. The Alaska Supreme Court made it clear that the Board of Game could not provide a native priority to public resources, the Copper Basin CSH was opened to all groups of 25 Alaskan residents or more. Moose and caribou permits allocated under the Copper Basin CSH cannot achieve a harvest priority for eight Ahtna communities in Unit 13, 11, and 12 on state lands.

If nothing is done the Copper Basin CSH will continue to attract more Alaska residents moose hunters drawn to the advantageous of an early season in southcentral Alaska and an “any bull” moose hunt quota. According to requests from Ahtna Tene Nene submitted to the Board of Game at the March 2016 meeting, RC121, and again on August 30, 2016 the current Copper Basin CSH is not helping to meet their subsistence needs. Data from the ADF&G Glennallen office shows Ahtna group members only made up 7%(242) of CM300 hunters in 2016. Ahtna's desires to acquire an “any bull” moose allocation for their members is only exacerbated under current regulations.

There is no other solutions other than just repeal 5 AAC 92.074(d). But by some bizarre coincidence 5 AAC 92.074 was not on the ADF&G call for proposals dealing with the Copper Basin CSH for moose and caribou in Unit 13, 11, and 12.

**PROPOSED BY:** Alaska Outdoor Council (EG-F16-148)

\*\*\*\*\*

**PROPOSAL 23 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest moose hunt as follows:

Remove the community harvest moose hunt, and only general season moose season with spike/fork, 50–inch antlers, four brow tines are allowed.

**What is the issue you would like the board to address and why?** Community harvest moose is decimating the herd in Unit 13. If this is not changed it will take decades to rebuild the herd up. The current any bull season is taking away all the mid-sized bulls, insuring that all the work done in Unit 13 to manage bulls with spike/fork 50–inch, 4 brow tines, is for naught. I live in the middle of Unit 13 year-round and have seen the decline of moose over the last five years.

Consider making a two bag limit for grizzlies, or baiting year-round for grizzlies to help moose out.

The only other consideration that makes any sense is the complete removal of the entire community harvest program.

**PROPOSED BY:** Claude Bondy (EG-F16-114)

\*\*\*\*\*

*Note: The board does not have the ability to take action with regard to Unit 20 as it was not on the Call for Proposals for this meeting.*

**PROPOSAL 24 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Clarify the communities eligible for the “100 any bull” quota and extend the season as follows:

Amend 5AAC 85.045 Hunting seasons and bag limits for moose

(a) (9) Unit 11, *(all parts of the Unit 11)*

SUBSISTENCE HUNT ONLY: 1 bull per harvest report by community harvest permit **issued pursuant to 5 AAC 92.074(d)** only; however, no more than 100 bulls that do not meet antler restrictions for other resident hunts **may be taken in the the community hunt area identified in 5 AAC 92.074(d)and by the members of the eligible community identified in 5 AAC 92.074(d)** [IN THE SAME AREA MAY BE TAKEN IN THE ENTIRE COMMUNITY HARVEST AREA] during the Aug. 20 - Sept. **25**[20] season;

(a)(10) Unit 12, *(all parts of Unit 12)*

SUBSISTENCE HUNT ONLY: 1 bull per harvest report by community harvest permit **issued pursuant to 5 AAC 92.074(d)** only; however, no more than 100 bulls that do not meet antler restrictions for other resident hunts **may be taken in the the community hunt area identified in 5 AAC 92.074(d)and by the members of the eligible community identified in 5 AAC 92.074(d)** [IN THE SAME AREA MAY BE TAKEN IN THE ENTIRE COMMUNITY HARVEST AREA] during the Aug. 20 - Sept. **25**[20] season;

(a)(11) Unit 13, *(all parts of Unit 13)*

SUBSISTENCE HUNT ONLY: 1 bull per harvest report by community harvest permit **issued pursuant to 5 AAC 92.074(d)** only; however, no more than 100 bulls that do not meet antler restrictions for other resident hunts **may be taken in the community hunt area identified in 5 AAC 92.074(d)and by the members of the eligible community identified in 5 AAC 92.074(d)**[IN THE SAME AREA MAY BE TAKEN IN THE ENTIRE COMMUNITY HARVEST AREA] during the Aug. 20 - Sept. **25**[20] season;

(a)(18)

**SUBSISTENCE HUNT ONLY: only in that portion of Unit 20A that is identified as part of the community hunt area in 5 AAC 92.074(d); 1 bull per harvest report by community harvest permit issued pursuant to 5 AAC 92.074(d) only; however, no more than 100 bulls that do not meet antler restrictions for other resident hunts may be taken in the the community hunt area identified in 5 AAC 92.074(d)and by the members of the eligible community identified in 5 AAC 92.074(d)during a season from August 20 – September 25.**

**What is the issue you would like the board to address and why?** The community subsistence hunt (CSH) for the area established in 5 AAC 92.074(d) is currently administered such that any group of 25 people may simply fill out an application and will be issued a permit and a moose harvest ticket for each household in the group. As a result, the number of moose CSH groups and households has expanded far beyond the board’s expectations and intent and no longer provides the eight communities that originally established the moose CSH with a reasonable opportunity. When the board originally established the CSH for the eight communities, it also established a quota of 100 “any bull” moose for the CSH based on findings about the amount of moose these eight communities needed to meet subsistence needs. The quota has remained 100 despite the huge increase in households and groups in the moose CSH. The proposed amended regulation would clarify that the 100 “any bull” quota for the units in the hunt area established in 92.074(d) is only for the eight communities that board has approved as eligible to participate in the CSH in the area. The proposal also extends the CSH moose season five days, until September 25, in the CSH area and for the identified communities. The extended hunting season is necessary to provide the eight villages with a reasonable opportunity. This proposal is supported by, and follows from, the Ahtna Tene Nene’s proposal to amend the ANS findings for moose to include a specific ANS determination for the “any bull” moose population in the CSH area described in 5 AAC 92.074(d) for the eight villages eligible for a CSH in the area.

**PROPOSED BY:** Ahtna Tene Nene’ (EG-F16-162)  
\*\*\*\*\*

**PROPOSAL 25 - 5 AAC 85.045 Hunting seasons and bag limits for moose; and 92.050 Required permit hunt conditions and procedures.** Eliminate the community subsistence harvest hunt for moose, or require hunters to choose subsistence or general hunt and restrict the hunt area. as follows:

Unit 13 subsistence hunt should be closed. If closing is not an option then it should restrict hunters to choose subsistence or general season not both. The community subsistence hunt should also be restricted to the area in which the community lives, or within 50 miles. Community subsistence hunt should also be limited to non-legal general season moose. This will have a dual purpose of stopping trophy hunters and make the subsistence hunt more sporting.

**What is the issue you would like the board to address and why?** Unit 13 moose population has drastically decreased since the implementation of the subsistence harvest. Subsistence hunters can hunt both the subsistence hunt and general season moose hunt in Unit 13.

**PROPOSED BY:** Sam Smith (EG-F16-125)  
\*\*\*\*\*

**PROPOSAL 26 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the antler restrictions for the general seasons moose hunt in Unit 13 as follows:

**5 AAC 85.045.** Unit 13 Moose.

One bull **with spike-fork or [50-INCH ANTLERS] 4 or more brow tines on at least one side.**

**What is the issue you would like the board to address and why?** Identifying a legal moose in areas with a 50-inch antler or number of brow tines. It is very difficult to estimate a 50-inch spread in the field, even under the best of conditions. Every year there are hunters who have taken moose falling short of a measurement of 50-inches and do not qualify as legal by the number of brow tines. Most hunters report their action but I am sure there are also many moose left to rot in the field. This is a waste of our resource. All due to the pressure on the hunter to be able to estimate a length of 50-inches from a great distance in the field.

**PROPOSED BY:** Larry Leveen (EG-F16-127)  
\*\*\*\*\*

**PROPOSAL 27 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the antler restrictions for the general season moose hunt in Unit 13 as follows:

Add to the existing general season requirements: 3 or more brow tines on each/both sides.

**What is the issue you would like the board to address and why?** Unit 13 harvest ticket, legal bull moose requirements. There is a need to expand the opportunity to harvest legal bull moose besides estimating the 50-inch antler requirement. There is a need to reduce the unbelievable stress on hunters having to estimate a 50-inch bull.

From observation and discussion with many other hunters most 3 x 3 brow tine bull moose exceed 50-inches on antler measurements.

**PROPOSED BY:** Ronald Faulkner (EG-F16-150)  
\*\*\*\*\*

**PROPOSAL 28 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the antler restrictions for the general season moose hunt in Unit 13 as follows:

Go back to the 36-inch or larger for legal bulls. This is much easier to abide by in hunting. This would protect: calves, yearlings, and most two year olds.

**What is the issue you would like the board to address and why?** Size of antlers required for general moose season in Unit 13. The present 50-inch, four brow tine doesn't work.

**PROPOSED BY:** Lee Adler (EG-F16-141)  
\*\*\*\*\*

**PROPOSAL 29 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Close the nonresident moose season in Unit 13 as follows:

5AAC 85.045 is amended to read:

**Unit 13**

**NONRESIDENT HUNTERS:** [SEPT. 1 – SEPT. 20] **No open season**  
[1 BULL WITH 50-INCH ANTLERS OR  
ANTLERS WITH 4 OR MORE BROW  
TINES ON ONE SIDE BY DRAWING  
PERMIT ONLY; UP TO 150  
PERMITS MAY BE ISSUED]

**What is the issue you would like the board to address and why? Restrict Nonresident Moose Hunting in Unit 13.** The Alaska Board of Game called this special out-of-cycle regulatory meeting based on a letter from Ahtna Tene Nene´ Native Corporation that people living in the Copper Basin communities were not meeting their subsistence needs under the Community Subsistence Harvest hunt structure, specifically with moose.

Various solutions have been offered, from doing away with the CSH hunts altogether, to going beyond what our state laws will allow in providing a priority to Copper Basin residents.

In all this, one thing seems to stand out: Why are we allowing any nonresident moose hunting opportunities if residents aren’t meeting their subsistence needs?

Currently there are 115 nonresident moose permits offered for all of Unit 13 (DM 335-339) for 50-inch, four brow tines moose during the September 1 – 20 general season hunt, with allocations set by subunit. Per the 2016 Draw Hunt results, all of these nonresident permits are fully subscribed.

Any moose, whether it falls under the general (nonresident) season regulations of 50-inch, 4 brow tines or the “any bull” regulations of the CSH hunt structure, is a moose available to resident hunters. All nonresident moose hunting in Unit 13 should be restricted if Copper Basin residents aren’t meeting their subsistence needs. This should be the first logical step taken in situations like this to allow the 115 moose available to nonresidents to be allocated to residents.

**PROPOSED BY:** Resident Hunters of Alaska (EG-F16-159)  
\*\*\*\*\*

**PROPOSAL 30 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Eliminate the community subsistence harvest hunt for caribou as follows:

We would like to propose that the community hunt for caribou (CC001) be eliminated totally and be taken off the books. The Tier I hunt does everything that the community hunt does without the

confusion, we would like to see the Tier I hunt (RC566) and the drawing hunt (DC485) remain in effect and this would achieve everything needed for the Copper Basin caribou hunting.

**What is the issue you would like the board to address and why?** This hunt has gotten out of hand and is very confusing, and with the Tier I hunt it is not necessary.

**PROPOSED BY:** Denali Fish and Game Advisory Committee (EG-F16-145)

\*\*\*\*\*

**PROPOSAL 31 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Eliminate the community subsistence harvest hunt for caribou as follows:

Delete: One caribou per harvest report per regulatory year by community harvest permit only; up to 300 caribou may be taken.

**What is the issue you would like the board to address and why?** The Copper Basin community subsistence harvest hunt, 5 AAC 92.074(d) is a financial and administrative burden to the ADF&G that according to Ahtna's 2016 request to the board, RC121, does not provide the 1,800 Ahtna group members a reasonable opportunity for subsistence use of caribou. AOC proposes eliminating the Copper Basin caribou CSH permits. The Tier I subsistence permit for caribou in Unit 13 at current population levels provides a reasonable opportunity for subsistence uses.

If the regulation is not changed the state will continue spending funding and staff time on a program that cannot achieve Athna's desired outcome, a native priority to public resources.

The only other solution would be to provide an Alaska native priority to public resources in Alaska's State Constitution

**PROPOSED BY:** Alaska Outdoor Council (EG-F16-147)

\*\*\*\*\*

**PROPOSAL 32 – 5AAC 92.050. Required permit hunt conditions and procedures.** Change the eligibility criteria for Tier I caribou and moose hunts in Unit 13 as follows:

Amend 5AAC 92.050. Required permit hunt conditions and procedures:

(a) The following conditions and procedures for permit issuance apply to each permit hunt:

(4)(I) no more than one Unit 13 Tier I subsistence permit for caribou may be issued per **eligible household every regulatory year; no more than one Unit 13 Tier I subsistence permit for moose may be issued per eligible household every regulatory year; eligibility shall be determined by successful completion of an application submitted to the department that demonstrates that the applicant's household is engaged in a subsistence pattern of use including reliance for upon a wide diversity of fish and game resources from Unit 13 and the immediate surrounding area that provides substantial economic, cultural, social, and**

**nutritional elements of the household's subsistence way of life and other criteria listed in 5 AAC 99.010(b)** [THE HEAD OF HOUSEHOLD, AS DEFINED IN 5 AAC 92.071(B), AND ANY MEMBER OF THE HOUSEHOLD OBTAINING A UNIT 13 TIER I SUBSISTENCE PERMIT IN A REGULATORY YEAR FOR CARIBOU MAY NOT HUNT CARIBOU OR MOOSE IN ANY OTHER LOCATION IN THE STATE DURING THAT REGULATORY YEAR];

**What is the issue you would like the board to address and why?** Current regulations for the Tier I household permits for Unit 13 require a permit holder to limit the household's moose hunting to Unit 13. This requirement has significantly increased the number of moose hunters in Unit 13 resulting in a loss of moose hunting opportunity for subsistence moose hunters. Those who depend on subsistence harvest of moose in Unit 13 do not have a reasonable opportunity as a result of the regulation. Those who depend on subsistence harvest of caribou in Unit 13 also do not have a reasonable opportunity as a result of the overcrowded impact of the regulation. Moreover, the board's determinations for the amount necessary for subsistence for moose and caribou cannot be justified given the increased number of those classified as, and participating as, subsistence moose and caribou hunters under this regulation.

The restriction limiting moose hunting to Unit 13 was intended to reduce the number of hunters who would apply for a Tier I caribou permit. This has not occurred. The number of Tier I permits and caribou hunters has increased while the subsistence moose and caribou hunting opportunity has declined. It is necessary to ensure that those Alaska residents who apply for and hunt for caribou and moose in Unit 13 are genuinely engaged in a pattern of use that is a subsistence use rather than another consumptive use. Merely linking moose and caribou hunting does not accomplish this purpose. Instead, the board needs to require Unit 13 Tier I caribou applicants to demonstrate a subsistence pattern of use consistent with the criteria for identifying customary and traditional uses listed in 5 AAC 99.010(b). Unit 13 moose hunts also need to be limited to those who can successfully obtain a Tier I permit under a similar application process and criteria.

**PROPOSED BY:** Ahtna Tene Nene' (EG-F16-163)

\*\*\*\*\*

**PROPOSAL 33 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Eliminate the caribou community subsistence harvest hunt, Tier I and drawing hunts, and the requirement to hunt moose in Unit 13; replace with a registration hunt period system as follows:

Replace current Unit 13 caribou hunting regulations (community subsistence harvest, Tier I, and drawing hunts) with a registration permit hunt system. Hunters would be able to register for one hunt period at a time (one week periods during the fall season; two week periods during the winter season), with options for additional hunt periods until successful. Revert to standard salvage requirements and eliminate the restriction on moose hunting outside Unit 13 for Nelchina Caribou hunters.

**These registration hunt periods will provide a reasonable opportunity for subsistence caribou hunting for all Alaskan hunters, while eliminating the burdensome and ineffective hunts currently offered.**

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

(8) Unit 13

[[1 CARIBOU PER REGULATORY YEAR BY HARVEST REPORT	NO OPEN SEASON (SUBSISTENCE HUNT ONLY)
--	---

COMMUNITY HARVEST PERMIT ONLY; UP TO 300 CARIBOU MAY BE TAKEN; OR	AUG. 10 - SEPT. 20 AND OCT. 21 – MAR. 31 (SUBSISTENCE HUNT ONLY)
--	--

1 CARIBOU EVERY REGULATORY YEAR BY TIER I SUBSISTENCE PERMIT ONLY; OR	AUG. 10 - SEPT. 20 AND OCT. 21 – MAR. 31 (SUBSISTENCE HUNT ONLY)
--	--

1 CARIBOU EVERY REGULATORY YEAR BY DRAWING PERMIT; UPTO 5,000 PERMITS MAY BE ISSUED]]	AUG. 20 - SEPT. 20 AND OCT. 21 - MAR. 31
--	---

**Resident Hunters:** **Aug. 10 – Sept. 20 and Oct. 21 – Mar 31**  
**1caribou per regulatory year**  
**by Registration Permit**  
**Up to 2000 permits may be issued per period**  
***\*We could see up to 3000 permits issued per period***

**Hunters may register online for ONE hunt period at a time Hunters may register for additional period(s) that still have permits available only AFTER their current period has ended**

**Hunters may register beginning July 1 through the end of the last period but may only possess Permit at a time.**

**Seasons:**  
**Aug 10 - 16**  
**Aug 17 - 22**  
**Aug 24 - 30**

**Aug 31 - Sept 6**  
**Sept 7 - 13**  
**Sept 14 – 20**  
**Oct 21 – Nov 3**  
**Nov 4 – Nov 17**  
**Nov 18 – Dec 1**  
**Dec 2 – Dec 15**  
**Dec 16 – 29**  
**Dec 30 – Jan 12**  
**Jan 13 – Jan 26**  
**Jan 27 – Feb 9**  
**Feb 10 – Feb 23**  
**Feb 24 – Mar 9\***  
**Mar 10 – Mar 23**  
**Mar 24 – Mar 31**

**\*During leap years, the schedule will remain the same; the leap year period will have an additional day.**

Our intent is to have each period be a separate registration hunt with a different hunt number. Given the hunt condition of only being able to register for one hunt period at a time (and only after their current period has ended), hunters will need to be held responsible for abiding by this condition. All hunters can be reminded of this condition when they register online. There should be no need to perform an electronic check to see if a hunter is already registered for a hunt considering this can easily be investigated by AWT after the fact.

**What is the issue you would like the board to address and why?** Unit 13 caribou (and moose) hunting regulations have become needlessly complex, intertwined, and ineffective in achieving harvest objectives. The harvestable surplus of Nelchina caribou far exceeds ANS, yet confusing and unnecessarily restrictive subsistence hunting regulations remain. Resident hunters have been asked to choose between burdensome, complicated and restrictive subsistence hunts, and an inconsistent drawing hunt. Although caribou (and moose) are abundant in Unit 13 at this time, it is important to maintain a regulatory structure capable of offering continued subsistence opportunity even if caribou numbers decline. Clearly there are significant challenges to managing Nelchina caribou hunting given the immense hunter interest, although it is time to simplify Nelchina caribou hunting regulations for the benefit of all Unit 13 hunters.

In recent years we have seen resident Nelchina caribou hunters readily switch between the CSH, the Tier I, the drawing hunts, and even the local federal hunts indicating an indifference to what type of permit they get, opting for a specific hunt opportunity or lack of restriction year to year. The restrictions on Nelchina caribou subsistence hunts are needless and actually reduce one's opportunity to successfully put meat in the freezer. By eliminating opportunities to hunt moose outside Unit 13, the current subsistence caribou hunts are increasing pressure on Unit 13 moose. By requiring CSH hunters to salvage unnecessary animal parts such as all the fat, the

current regulations actually make it difficult for CSH hunters to backpack or hike off road to hunt. The existing hunts are just too complex and restrictive at the same time.

Finally, the current caribou hunting regulations do nothing to optimize the number of hunters in the field (and subsequent harvest). History has shown that throwing more permits out for a seven month season does not always equal more harvest. When hunters have such an extended hunt season, they often put off hunting until “later” or when the caribou “show up”. The result can be a number of unused permits and crowding when the caribou hit the Denali or Richardson Highways. In recent years, this has left the total harvest short of management objectives. By offering registration hunt periods throughout the season, hunters will plan ahead and put more effort into their hunt opportunity. Nelchina caribou are not always easily accessible, but some caribou are always available.

While the population is above the objective at this time, at some point the Nelchina caribou herd will decline. This registration hunt system will offer the department the flexibility to reduce permit numbers, and emergency close the hunt if necessary for conservation purposes. In line with historical Nelchina caribou management and known migration patterns, there can be no guaranteed winter season for caribou in Unit 13.

**PROPOSED BY:** Aaron Bloomquist and Rebecca Schwanke (EG-F16-160)  
\*\*\*\*\*

**PROPOSAL 34- 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Eliminate the community subsistence harvest hunt for caribou, increase the number of caribou household Tier I permits, and shorten the season as follows:

Eliminate the community subsistence caribou harvest program, CC001.

Issue all Tier I households two caribou permits when the herd population is high.

Shorten caribou drawing hunt season, DC485, to October 21 through March 31 to reduce overcrowding and competition with subsistence hunters.

**What is the issue you would like the board to address and why?** Overcrowding of the hunt area, failure to meet ADF&G harvest quotas, extra workload managing the community subsistence caribou harvest program.

**PROPOSED BY:** James Holmes (EG-F16-156)  
\*\*\*\*\*

**PROPOSAL 35 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.050(a)(4)(I). Required permit hunt conditions and procedures.** Eliminate the community subsistence harvest moose hunt and remove the requirement for Tier I caribou hunters to hunt moose in Unit 13 as follows:

Get rid of the community harvest completely. Take away the link for Tier I to have to hunt a moose in the same unit as the caribou tag.

**What is the issue you would like the board to address and why?** The population of the moose in Unit 13 is becoming extremely low! We aren't seeing many legal moose as we use to years ago. My concern is that the moose population is going to crash in Unit 13 and will never rebound. This is due to linking a moose to the Tier I, community harvest and then the general harvest. The pressure on the moose population extends way too long with the extra days of hunting moose by the community harvest and the serval thousand tags that then also link a moose to a caribou tag. The moose population can't withstand all that pressure for much longer.

**PROPOSED BY:** Jennifer Bondy (EG-F16-123)

\*\*\*\*\*

**PROPOSAL 36 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Increase the bag limit for the caribou community harvest hunt and clarify the communities eligible for receiving the 300 caribou quota as follows:

Amend **5 AAC 85.025(a)(8). Hunting seasons and bag limits for caribou**, in Unit 13

SUBSISTENCE HUNT ONLY; Caribou Unit 13:

1 2 [1] caribou per harvest report per regulatory year by community harvest permit **issued pursuant to 5 AAC 92.074(d)** only; up to 300 caribou may be taken **by the members of the eligible community identified pursuant to 5 AAC 92.074(d) during seasons from August 10 – September 30** [20] and October 21 – March 31;

**What is the issue you would like the board to address and why?** The community subsistence hunt (CSH) for caribou in the area established in 5 AAC 92.074(d) is currently administered such that any group of 25 people may simply fill out an application and will be issued a CSH permit and a harvest ticket for one caribou for each household in the group. When the board originally established the caribou CSH for the eight communities listed in the regulation, it also established a quota of 300 caribou for the CSH based on findings about the amount of caribou and hunting opportunity those original eight communities needed to meet subsistence needs. The quota has remained 300 despite the huge increase in households and groups in the caribou CSH. The board also changed the household bag limit for those participating in the CSH from two caribou per household to one caribou per household. The amended regulation changes the bag limit back to two caribou per household. The amendments also clarify that the 300 caribou quota for the CSH

applies only to those communities that board has approved as eligible to participate in the CSH pursuant to 92.074(d). The proposal also extends the CSH season 10 days, until September 30.

**PROPOSED BY:** Ahtna Tene Nene' (EG-F16-161)  
\*\*\*\*\*

**PROPOSAL 37 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Lengthen the caribou season, increase winter caribou bag limit, and establish a youth hunting season as follows:

Some ways to solve this problem would be to extend the season from August 10 - March 31 with no closing time.

Allow a two caribou bag limit for the time frame of October 1- March 31. This would give more of an incentive for hunters to hunt the winter season and not during the season when moose is open at the same time.

Another suggestion would be to open a youth hunt from August 1-20 which would allow families to be able to give the youths a chance to hunt when the Denali Highway isn't saturated with other hunters. This would also be during a time when the youth aren't in school so they would be given more incentive to hunt early.

**What is the issue you would like the board to address and why?** I am very concerned about the numbers of hunters on the Denali Highway at the same time. The Denali Highway allows for easy hunting with highway access for hunting of caribou and other game This then brings a huge safety issue with hunters shooting over other hunters. The whole unit has become more and more saturated over the last three years. The issue comes from the high caribou tags given with Tier I and Tier II over the last few years, community harvest and general harvest all hunting the fall all at the same time.

Another issue is that many kids are being denied the chance to hunt on the Denali Highway. Parents are either not bringing their children or ending their hunts early due to this safety. Many friends voiced their concerns with their children being in an area where hunters are shooting over other hunters. This then discourages our next generation of hunters! The Denali Highway is a great place to bring children since it is an easy area to hunt with lots of support in case there is a need for lodging and food.

**PROPOSED BY:** Jennifer Bondy (EG-F16-121)  
\*\*\*\*\*

**PROPOSAL 38 – 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 92.050. (a)(4)(I). Required permit hunt conditions and procedures.** Eliminate drawing hunt for caribou in Unit 13, and remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13 as follows:

Do away with the draw hunt for caribou in Unit 13 and just use the Tier I subsistence hunt. Stop making hunters hunt their moose in Unit 13 when they have a Tier I caribou tag and you will be able to control the caribou population with the Tier I hunt.

**What is the issue you would like the board to address and why?** The caribou herd is strong in Unit 13, numbers are high. Provide increase opportunity for hunters.

**PROPOSED BY:** Adam Durland (EG-F16-136)  
\*\*\*\*\*

**PROPOSAL 39 - 5 AAC 92.050(a)(4)(I). Required permit hunt conditions and procedures.**

Remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13 as follows:

There is no requirement to hunt moose in Unit 13 if applying for a Tier I caribou tag.

**What is the issue you would like the board to address and why?** Propose to remove requirement for Tier I caribou hunters to be required to hunt moose in Unit 13 also. Moose numbers are suffering out here for many factors, but tying caribou to moose is a major factor since the number of tags given out for caribou is increasing. While it is understood that the caribou herd is doing well, and the extra tags are needed to reduce numbers, the side effect is that the moose are getting thinned out. You need more caribou hunters and less moose hunters.

If nothing is changed, the moose numbers will become critically low, and under current regulations is not sustainable.

Considered increasing bag limit to two caribou per Tier I tag to help reduce caribou numbers. Also considered opening the season for everyone on August 1, and keep it open until March 31 the following year. Also, considered a youth caribou hunt for the first ten days of August, no stringent requirements to apply.

**PROPOSED BY:** Claude Bondy (EG-F16-111)  
\*\*\*\*\*

**PROPOSAL 40 - 5 AAC 92.050(a)(4)(I). Required permit hunt conditions and procedures.**

Remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13 as follows:

Allow residents to put in for other draw permits and still draw Tier I RC566.

**What is the issue you would like the board to address and why?** Please consider changing the requirement that hunters must hunt in Unit 13 if you draw a Tier I permit for caribou. RC566.

The requirement puts added pressure on the moose herd. A resident should be able to put in for other permits and not be required to hunt only Unit 13.

**PROPOSED BY:** Kenneth Ray

(EG-F16-134)

\*\*\*\*\*

**PROPOSAL 41 - 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 92.050(a)(4)(I). Required permit hunt conditions and procedures.** Shorten the season dates for the Unit 13 caribou draw hunt, and remove the requirement that Unit 13 Tier I caribou hunters to hunt moose in Unit 13 as follows:

Shorten the time that draw tag hunters have to harvest caribou. This would allow more tags to be issued and reduce crowding. Two week periods per tag. Do away with the requirement to only hunt Unit 13 when you have a Tier I tag.

**What is the issue you would like the board to address and why?** Unit 13 has become a zoo with way too many hunters concentrated.

**PROPOSED BY:** Travis Price

(EG-F16-120)

\*\*\*\*\*

**PROPOSAL 42 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Change the dates for the Unit 13 caribou draw season as follows:

No Hunting by DC485 permit holders after September 20 date.

**What is the issue you would like the board to address and why?** Closing state Tier I & II on day of federal subsistence opening. Most or all permit holders qualify for the federal anyway. Not enough room to safely hunt!

**PROPOSED BY:** Douglas Sickles

(EG-F16-139)

\*\*\*\*\*

*The following proposal was submitted prior to the proposal deadline but was inadvertently excluded from the proposal book. It is scheduled for consideration by the Board of Game at the March 2017 meeting.*

**PROPOSAL 43 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the community subsistence harvest hunt for moose, lengthen the general season and adopt an “any bull” registration permit as follows:

Amend resident moose hunting seasons in Units 11 and 13 by eliminating the CSH moose hunt, lengthening the general season, and adding a late season “any bull” registration hunt.

*Retain existing moose registration hunt in Unit 11 and moose drawing hunts in Unit 13.*

**General Season:** Align Units 11 and 13 general moose season length to run August 20 – September 20, retaining existing general season bag limits in each unit; Unit 13: spike-fork, 50-inch, four brow tine; Unit 11: spike-fork, 50-inch, three brow tine.

**New Late Season Registration Permit Hunt(s):** The late season registration moose hunt(s) will have a bag limit of “any bull” and run November 15 - 30. The hunt(s) will be offered in Units 11 and 13 as follows:

- That portion of Unit 11 (outside the Nabesna Road Registration Permit Area) and Unit 13 within 10 miles of the Edgerton Highway, the Tok Cutoff, and the Richardson Highway between the Tok Cutoff and the Edgerton Highway. Collectively, this area can be referred to as the Copper Valley Permit Area (CVPA). Registration permits for the CVPA must be picked up within the unit (Glennallen), first come first serve. Issue up to 500 permits.
- Remainder of Unit 11; registration permit available online, first come first serve. Issue up to 20 permits.
- Unit 13A West; registration permit available online, first come first serve. Issue up to 20 permits.
- Remainder of Unit 13A; registration permit available online, first come first serve. Issue up to 20 permits.
- Remainder of Unit 13B; registration permit available online, first come first serve. Issue up to 50 permits.
- Remainder of Unit 13C; registration permit available online, first come first serve. Issue up to 75 permits.
- Remainder of Unit 13D; registration permit available online, first come first serve. Issue up to 75 permits.
- Unit 13E; registration permit available online, first come first serve. Issue up to 75 permits.

Hunters should be limited to one late season registration moose permit per season within Units 11 and 13.

**Regulations to be amended as follows:**

5 AAC 85.045. Hunting seasons and bag limits for moose

(9)

Unit 11, that portion east of the east bank of the Copper River upstream from and including the Slana River drainage

[RESIDENT HUNTERS:

1 BULL PER HARVEST REPORT  
BY COMMUNITY HARVEST  
PERMIT ONLY; HOWEVER, NO  
MORE THAN

AUG. 10 - SEPT. 20  
DEC. 1 - DEC. 31  
(SUBSISTENCE HUNT ONLY)

100 BULLS THAT DO NOT MEET ANTLER RESTRICTIONS FOR OTHER RESIDENT HUNTS IN THE SAME AREA MAY BE TAKEN IN THE ENTIRE COMMUNITY HARVEST AREA DURING THE AUG. 10 - SEPT. 20 SEASON; OR]

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side, by registration permit only

Aug. 20 - Sept 17

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 3 or more brow tines on one side, by registration permit only

Aug. 20 - Sept. 17

[REMAINDER OF UNIT 11]  
[1 BULL PER

HARVEST REPORT BY COMMUNITY HARVEST PERMIT

AUG. 10 - SEPT. 20

(SUBSISTENCE HUNT ONLY)

ONLY; HOWEVER, NO MORE THAN

DEC. 1 - DEC. 31

100 BULLS THAT DO NOT MEET

(SUBSISTENCE HUNT ONLY)

ANTLER RESTRICTIONS FOR OTHER RESIDENT HUNTS IN THE SAME AREA MAY BE TAKEN IN THE ENTIRE COMMUNITY HARVEST AREA DURING THE AUG. 10 - SEPT. 20

SEASON; OR]

**Resident Hunters:**

**That portion of Unit 11 within  
10 miles of the Edgerton Highway, the  
Tok Cutoff, and the Richardson  
Highway between the Tok Cutoff and  
the Edgerton Highway, or**

1 bull with  
spike-fork antlers  
or 50-inch antlers or  
antlers  
with 3 or more brow tines  
on one side;

Aug. 20 - Sept. 20

**1 bull by Registration Permit**

**Available in Glennallen**

**Oct 1- Nov 30**

**Permits Available in Glennallen Only Up  
to 500 Permits may be issued, or**

**Nov. 15 – Nov. 30**

**Remainder of Unit 11**

**Resident Hunters:**

1 bull with  
spike-fork antlers  
or 50-inch antlers or  
antlers with 3 or more  
brow tines on one  
side;

Aug. 20 - Sept. 20

**1 bull by Registration Permit  
outside of the Copper Valley**

**Permit Area (CVPA)**

**Permits available online**

**Oct 1- Nov 30**

**Up to 20 permits may be issued**

**Nov. 15 – Nov. 30**

(11)

Units and Bag Limits

Unit 13

1 moose per  
regulatory year

only as follows:

Resident Hunters:

[1 BULL PER HARVEST  
REPORT

AUG. 20 - SEPT. 20

BY COMMUNITY

HARVEST PERMIT ONLY;  
HOWEVER, NO

DEC. 1 - DEC. 31

MORE THAN

(SUBSISTENCE HUNT ONLY)

100 BULLS THAT DO

NOT MEET ANTLER

RESTRICTIONS FOR

OTHER RESIDENT HUNTS

IN THE SAME AREA MAY

BE TAKEN IN THE ENTIRE

COMMUNITY HARVEST

AREA DURING THE AUG.

10 - SEPT. 20

SEASON; OR]

1 bull with

spike-fork antlers

or 50-inch antlers

or

antlers with 4 or

more brow tines

on one side;

**Aug. 20** [SEPT. 1] – Sept. 20

or

1 bull, by registration

[DEC. 1 – DEC. 31]

permit only **as follows:**

**Nov. 15 – Nov. 30**

**Copper Valley Permit Area (CVPA)**

**That portion of Unit 13 within**

**10 miles of the Edgerton Highway,**

**the Tok Cutoff, and the Richardson**

**Highway between the Tok Cutoff**

**and the Edgerton Highway,**

**Permits Available in Glennallen Only**

**Oct 1 - Nov 30**

**Up to 500 Permits may be issued**

**Unit 13A west of the Lake Louise**

**Road, Lake Louise, Susitna Lake,**

**Tyone Lake, and the Tyone River**

**Permits available online**

**Oct 1- Nov 30**

**Up to 20 permits may be issued**

**Unit 13A east of the Lake Louise  
Road, Lake Louise, Susitna Lake,  
Tyone Lake, and the the Tyone River,  
outside of the CVPA**

**Permits available online**

**Oct 1- Nov 30**

**Up to 20 permits may be issued**

**Remainder of Unit 13B**

**Permits available online**

**Oct 1 - Nov 30**

**Up to 50 permits may be issued**

**Remainder of Unit 13C**

**Permits available online**

**Oct 1 - Nov 30**

**Up to 75 permits may be issued**

**Remainder of Unit 13D**

**Permits available online**

**Oct 1 - Nov 30**

**Up to 75 permits may be issued**

**Unit 13E**

**Permits available online**

**Oct 1- Nov 30**

**Up to 75 permits may be issued**

1 antlerless  
moose by drawing  
permit only; up to  
200 permits  
may be issued; a person may  
not take a calf or  
a cow accompanied  
by a calf; or

Oct. 1 – Oct. 31  
Mar. 1 – Mar. 31  
(General hunt only)

1 bull moose by

Sept. 1 – Sept. 20

Drawing permit only,  
Up to 5 permits may  
Be issued;

(General hunt only)

NONRESIDENT HUNTERS:

Sept. 1 – Sept. 20

1 bull with 50-inch  
antlers or antlers  
with 4 or more brow  
tines on one side  
by drawing permit  
only; up to 150  
permits may be issued.

**What is the issue you would like the board to address and why?** These hunts will provide a reasonable opportunity for subsistence moose hunting for all Alaskan hunters, while eliminating the confusing and burdensome regulations associated with the community subsistence hunt. General season moose hunts offer subsistence opportunity throughout the state, and have in Unit 11 for many years. They can offer this opportunity again within Unit 13, particularly given recent general season harvest numbers that exceed ANS. Resident subsistence moose hunters will have a priority over nonresident and resident drawing permit hunters. Resident hunters will have four and a half weeks in the fall general season, and then another two weeks in early winter in the registration hunt to harvest a moose. The resident take through these hunts will more than meet ANS. The extended fall hunt dates should be sustainable in Unit 13 (as they are in Unit 11) given the high early hunt pressure recently seen during the CSH. The extended season will accommodate traditional moose hunting activities, including family oriented hunting opportunity (before school).

The two week November registration hunt offers a “second chance” for those not successful during the general season. This early winter time frame allows for travel into some areas that are normally un-hunted during the fall due to open water (supported by continually high bull:cow ratios in some areas). It also offers family hunting opportunity over the Thanksgiving holiday. While we recognize there will be post-rut concentrations of moose in higher elevations, the limited number of permits for these areas will reduce harassment and keep harvest sustainable.

This proposal moves Unit 13 moose management away from arbitrary subsistence harvest objectives such as 100 “any bull” moose, and towards a scenario where harvest opportunity can be maximized in direct relation to how many bulls remain after each hunting season. By establishing permit numbers in regulation, this hunt offers sustainability and a hunting opportunity hunters can plan for. We would like to see the maximum permit numbers be issued in year one. If in three years, bull:cow ratios are still above objectives or they are compromised in a specific area(s), permit numbers can be altered. If there is a demonstrated biological problem earlier, ADF&G can reduce permit numbers. No arbitrary quotas or Emergency Orders are necessary.

A high number of registration permits is suggested for the CVPA because it is mostly “pass through” country along the highway corridor in Unit 11 and 13. There are likely some resident moose within the corridor, but most moose in the area during November are likely moving in

from the surrounding lightly hunted areas. Much of this land is also privately owned, so access and harvest opportunity will be limited.

Conservative registration permit numbers should be set for areas with heavy fall hunting pressure given current bull:cow ratios such as in 13B and the western portion of 13A. Moderate permit numbers can be set for 13C, 13D and 13E considering much of the moose habitat in these areas is inaccessible during the fall and thus lightly hunted. Continually high bull:cow ratios and increasing moose numbers in these areas suggest additional harvest will be sustainable. In the case of 13E there will also be some bulls migrating out of park areas that are otherwise closed to state hunters, becoming available to state subsistence hunters for the first time.

Given existing proxy regulations, late season registration hunters will be able to proxy hunt for others, but only once per season within Unit 13.

Units 11 and 13 moose (and caribou) hunting regulations are needlessly complex and intertwined. The harvestable surplus of moose now far exceeds ANS, yet confusing and unnecessarily restrictive subsistence hunting regulations remain. What began as a limited subsistence priority through the Community Subsistence Hunt (CSH), has become a burdensome and complicated hunt for the masses of resident hunters interested in the once available proxy opportunity, a longer moose season and a chance at harvesting a bull moose without antler restrictions. These benefits have drawn in hunters from all over the state. The overly restrictive salvage requirements and the restrictions on other hunting opportunities have clearly not worked to restrict the hunt to those that may need it the most. The large number of CSH participants has actually increased the hunting competition in this area to the point of saturation, and no longer resembles subsistence hunting in any way. It is time to separate the Unit 11 and 13 moose (and caribou) hunts and simplify the hunting regulations.

**PROPOSED BY:** Aaron Bloomquist and Rebecca Schwanke (EG-F16-169)  
\*\*\*\*\*