

**ALASKA DEPARTMENT OF FISH AND GAME**  
**STAFF COMMENTS**  
**INTERIOR AND EASTERN ARCTIC REGION PROPOSALS**  
**ALASKA BOARD OF GAME MEETING**  
**FAIRBANKS, ALASKA**  
**MARCH 6-14, 2020**



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 6-14, 2020 in Fairbanks, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

**PROPOSAL 44 – 5 AAC 99.025(a)(12). Customary and traditional uses of migratory bird and waterfowl population(s).** Address customary and traditional use findings for migratory birds and waterfowl in Units 12, 19, 20, 21, 24, and 25 & develop regulations to provide reasonable opportunity for subsistence uses.

**PROPOSED BY:** Darrell Vent, Sr.

**WHAT WOULD THE PROPOSAL DO?** Determine if there are customary and traditional (C&T) subsistence uses of migratory birds and waterfowl in Units 12, 19, 20, 21, 24, and 25.

**WHAT ARE THE CURRENT REGULATIONS?** There are various state and federal regulations governing the hunting of migratory game birds, which include ducks, geese, swans (which together constitute “waterfowl”), cranes, and snipe. The department prepared an in-depth customary and traditional use worksheet (Special Publication No. BOG 2017-10), which is posted on the Board of Game’s website for the November 2017 Statewide meeting. Detailed state and federal regulations can be found in the report. At its 2017 statewide meeting, the Board found that migratory game birds are customarily and traditionally used for subsistence in all units except within the nonsubsistence areas defined in 5 AAC 99.015. The Board did not establish an amount reasonably necessary for subsistence (ANS).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** No effect, as the Board has determined there are customary and traditional uses of migratory game birds throughout their ranges in Alaska.

**BACKGROUND:** AS 16.05.258 requires the board to identify game populations or portions of populations that support customary and traditional subsistence uses (a “C&T finding”) and to adopt regulations that provide reasonable opportunities for Alaska residents to participate in these subsistence uses. At its January 2017 meeting in Bethel, the Board made a positive C&T finding for migratory game birds in the Arctic/Western region (Units 18, 22, 23, and 26A) and then expanded this finding statewide at its November 2017 meeting.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal; there already exists a positive C&T finding for migratory game birds in Units 12, 19, 20, 21, 24, and 25.

**COST ANALYSIS:** Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in these hunts or in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 45 – 5AAC 92.080. Unlawful methods of taking game; exceptions.** Prohibit the use of moose, caribou and reindeer urine as scent lures in the Interior and Eastern Arctic (Region 3).

**PROPOSED BY:** Grayling, Anvik, Shageluk, Holy Cross (GASH) Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would add moose, caribou, and reindeer urine to the list of prohibited scent lures in Region 3.

**WHAT ARE THE CURRENT REGULATIONS?**

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

The following methods of taking game are prohibited:

...

(15) with the use of deer or elk urine, and while in immediate personal possession of deer or elk urine, including scent lures;

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would make it illegal in Region 3 to use urine of moose, caribou and reindeer as lures. This may decrease the likelihood of urine of these additional species that may be part of diseased populations outside Alaska being used in this portion of Alaska.

**BACKGROUND:** In 2011 the department submitted a proposal to prohibit the use of deer or elk urine as a method of taking game, citing concerns for the transmission of Chronic Wasting Disease (CWD). At the time, deer and elk urine were known for having the potential to transmit the disease and other states had already banned the import and use of them as well. Since then, new information has become available and moose urine is now recognized as being as risk for being capable of transmitting CWD. There is no reason to believe caribou and reindeer urine are not susceptible to the same problems and therefore the proponent is asking the board to take similar action as a precautionary step rather than a reactionary step after it is potentially too late.

CWD could be brought to the state and spread through urine used as scent lures. Since the prions bind to the soil, the risk of transmission remains for many years and there is no known mitigation or way to destroy the prions in the soil.

The infectious agent CWD, a fatal disease of deer, elk, moose, and likely caribou, is a mutant protein or “prion” that can be passed in urine. Because CWD is not present in Alaska, it is in the best interest of Alaska’s wildlife to prohibit use of any substance that might bring this disease into the state. This mutant protein can bind to soils and remain infectious for many years and there is no known way to destroy the prions in the soil. Some captive deer facilities producing urine products for hunting have not complied with mandatory disease prevention and monitoring regulations. As a result, their products might be capable of transmitting diseases such as CWD. Other states and provinces have enacted regulations to prevent the import and use of doe urine.

Moose, caribou, reindeer, deer, elk, moose, sheep, goat, and caribou populations will be afforded some protection against this disease being brought into the state. As more states detect CWD in their wild cervid populations each year, an Alaska free of CWD will put our cervids at a premium for hunters.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal due to concerns about CWD. If adopted, the board should use the existing language that prohibits having these

items in immediate personal possession while hunting, similar to deer and elk urine. Because of statewide implications, the board should consider deferring this proposal to the 2021 statewide meeting. This issue goes beyond Region 3 and therefore should be addressed at the statewide meeting so the language and criteria can be consistent across the state.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 46–5 AAC 92.115.** Establish a predation control plan for both brown and black bears throughout the Interior–Northeast Arctic Region (Region III).

**PROPOSED BY:** Alissa Nadine Rogers

**WHAT WOULD THE PROPOSAL DO?** The proposal asks the Board of Game and the department to establish predator control for bears in the Interior and Eastern Arctic Region of the state (Region III) with the goal of reducing bear predation on ungulate populations.

**WHAT ARE THE CURRENT REGULATIONS?**

Moose hunting seasons are listed in 5 AAC 85.045 and caribou hunting seasons are listed in 5 AAC 85.025. The regulations are also summarized in the current Alaska Hunting Regulations.

IM programs have been established to restore moose, caribou, and deer populations throughout Alaska and are listed in 5 AAC 92.111-127. A list of current intensive management (IM) programs and their status is maintained on the department’s website at:

<http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.programs> .

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, the department will complete a feasibility assessment for each of the 21 big game prey populations identified as having a positive IM finding in 5 AAC 92.108. The board would then direct the department to develop IM operational plans for the situations that the board considers feasible and have a reasonable chance of success. Anticipated beginning and end dates of approved IM programs would be included in adopted programs.

**BACKGROUND:** A feasibility assessment summarizes available biological and management information and gauges the potential that a proposed IM program will meet ungulate population and harvest objectives within a defined time frame. IM programs are developed to meet IM objectives for caribou, moose, and deer populations that have been identified as important for high levels of consumptive use.

IM programs can include habitat manipulation, predation control, or both to meet IM objectives for specific caribou and moose populations identified by the board as important for high levels of consumptive use. The board will consider 8 Region III proposals (numbers 75, 76, 86, 88, 96, 104, 105, and 106) that request predation control be reauthorized or implemented to benefit specific ungulate populations.

Region III covers 247,292 mi<sup>2</sup>. Moose and caribou densities vary throughout Region III, depending on habitat quality, predation, weather, and other factors. While some ungulate populations may benefit from predation control, some are at carrying capacity of the habitat, while others may be limited by weather, or other factors.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal. The department considers implementing predator control when ungulate populations are below IM objectives, and follows guidance in AS 16.05.255 and 5 AAC 92.106, when warranted. This issue is best addressed at a population level (see proposals 75, 76, 86, 88, 96, 104, 105, and 106). Predation control may or may not be feasible for each of these 21 populations, depending on biological factors combined with other factors, such as land ownership patterns, program cost, and social concerns such as hunter crowding or accessibility of the moose or caribou populations to hunters.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 47 – 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045 Hunting seasons and bag limits for moose.** Prohibit nonresident hunting of any prey species in the Interior–Northeast Arctic Region under an Intensive Management Plan in the Interior–Eastern Arctic Region (Region III) until harvest or population objectives are met.

**PROPOSED BY:** Resident Hunters of Alaska.

**WHAT WOULD THE PROPOSAL DO?** This proposal would eliminate the ability to have nonresident moose hunting seasons in Unit 19A and Unit 19D East (which currently do not have nonresident seasons), and in Unit 21E (which has a drawing hunt for nonresident hunters).

This proposal has the potential to eliminate hunting for Fortymile caribou (RC860) by nonresidents in Units 20E and 25C and in portions of Units 20B, 20D, and 20F if the herd drops below the Intensive Management (IM) population or harvest objectives during the life of the IM plan in 5 AAC 92.113.

**WHAT ARE THE CURRENT REGULATIONS?**

*Unit 19A* — The Unit 19A predation control plan in 5 AAC 92.123(b) authorizes predation control for wolves and bears to aid in achieving moose IM objectives. The board will consider whether to renew this plan in Proposal 104, since it will expire June 30, 2020. Moose in Unit 19A have a positive IM finding in 5 AAC 92.108 for providing high levels of harvest for human consumptive use, with a population objective of 13,500–16,500 and harvest objective of 750–950, which represent Units 19A and 19B, combined. According to 5 AAC 92.123(b), the proportional harvest objective for Unit 19A is 400–550 moose annually.

As outlined in 5 AAC 99.025, Unit 19 outside the Lime Village Management Area (LVMA) has a positive C&T use finding and an ANS of 400–700 moose, including 175–225 moose in Unit

19A and 20–24 in Unit 19B. Unit 19 in the LVMA (which is in Unit 19A) has a positive C&T and an ANS of 30–40 moose.

The IM population objective for moose in Unit 19A would require a moose density within the entire area of approximately 0.75–0.93 moose/mi<sup>2</sup>. The recent moose density estimate of 0.6 moose/mi<sup>2</sup> in Unit 19A during 28 February–9 March 2017 was well below this objective. The average annual harvest of 113 moose in Unit 19A and 30 in Unit 19B during RY16–RY18 is typical and is well below the IM harvest objective of 750–950 moose.

In accordance with AS 16.05.255(d), residents have preference for subsistence and personal uses over taking by nonresidents. There are no nonresident seasons for moose in Unit 19A.

*Unit 19D-East* — The Unit 19D-East predation control plan in 5 AAC 92.123(c) authorizes predation control for wolves and bears to aid in achieving moose IM objectives. The board will consider whether to renew this plan in Proposal 96, since it will expire June 30, 2020. Moose in Unit 19D East have a positive IM finding in 5 AAC 92.108 for providing high levels of harvest for human consumptive use with a population objective of 6,000–8,000, and a harvest objective of 400–600. the LVMA also has a positive C&T and an ANS of 30–40 moose.

Residents may hunt for antlered bulls throughout Unit 19D during either a 20- or 25-day season in September, depending on the area and whether they are hunting under a harvest ticket or a registration permit. There are no nonresident seasons within the Unit 19D East IM area. Nonresidents may hunt for bulls with at least 50-inch antlers or antlers with 4 or more brow tines on at least one side during 20 days only in the portion of Unit 19D in and between the Cheeneetnuk and Gagaryah River drainages and at least 2 miles off the Swift River (this area is not included in an IM plan and therefore would not be affected by this proposal).

The population in Unit 19D East is estimated to be about 8,400 moose, which is above the IM objective of 6,000–8,000. The moose population is likely below the objective of 4,000–6,000 within the remainder of Unit 19D. Reported harvest of 156 moose in Unit 19D during RY16–RY18 is typical, and did not meet the Unit 19D East harvest objective of 400–600 or the harvest objective of 250–600 in the remainder of Unit 19D.

*Unit 21E* — The Unit 21E predation control plan in 19.124(b) authorizes predation control for wolves and bears to aid in achieving moose IM objectives for moose. Moose in Unit 21E have a positive finding in 5AAC 92.108 for providing high levels of harvest for human consumptive use, with a population objective of 9,000–11,000, and a harvest objective of 550–1,100. As outlined in 5 AAC 99.025, Unit 21 has a positive C&T finding for moose and ANS of 600–800, including those taken in Unit 21E.

Residents have a 25-day season and nonresidents have a 21-day season. Residents may hunt for any antlered bull, using an unlimited number of registration permits, while nonresidents are limited to 50 drawing permits and may only harvest a bull with at least 50-inch antlers or antlers with 4 or more brow tines on at least one side.

The current population estimate for all of Unit 21E is 9,777 moose. This is in the middle of the range of the Unit 21E intensive management objective (9,000–11,000). The current estimate of

harvestable surplus is 390 moose. Harvest during RY16–RY18 was about 210 moose per year (about 28 by nonresidents), which is well below the IM harvest objective of 550–1,100 moose.

*Fortymile Caribou Herd* — The Upper Yukon–Tanana Predation control plan in 5 AAC 92.113 authorizes predation control for wolves to aid in achieving Fortymile caribou herd IM objectives. This plan encompasses Units 20E and 25C and parts of Units 12, 20B, 20D, and 20F. This herd has met the IM population and harvest objectives, and so would not be affected by this proposal unless the population or harvest levels drop below these thresholds. The board will consider whether to renew this plan in Proposal 86, since it will expire June 30, 2020.

The Fortymile caribou herd has a positive IM finding in 5 AAC 92.108 for providing high levels of harvest for human consumptive use, a population objective of 50,000–100,000 caribou, and a harvest objective of 1,000–15,000 caribou. The herd has a positive C&T use finding and ANS of 350–400 caribou.

Residents may take any caribou during the RC860 fall hunt, while nonresidents are restricted to bulls. Only residents may hunt the 121-day RC867 winter hunt for any caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, population and harvest objectives in 5 AAC 92.108 would determine whether the board could consider a nonresident season in areas with active predation control plans. Factors including the harvestable surplus, C&T findings, ANS, and historical harvest by residents and nonresidents would only be considered after the Intensive Management population or harvest objectives are met.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of hunting opportunity between resident and nonresident hunters. The board may wish to review the Nonresident Hunter Allocation Policy found in Board Findings 2017-222-BOG. This proposal was also submitted for the Western Arctic/Western Region meeting which would indicate that the proponent would prefer the regulation implemented statewide.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 48 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.** Change the hunting season for wolves in Units 19, 20, 21, 24, 25, 26B, and 26C to start on August 1.

**PROPOSED BY:** Brian Watkins

**WHAT WOULD THE PROPOSAL DO?** This proposal would lengthen wolf hunting seasons in Units 19, 20, 21, 24, 25, 26B, and 26C by changing the starting date from August 10 to August 1 throughout Region 3 (except Unit 12). Ending dates in these areas would remain the same.

**WHAT ARE THE CURRENT REGULATIONS?**

Residents and nonresidents

- Unit 12 (the only unit in Region 3 not part of this proposal); August 10–May 31 with a bag limit of 10 wolves.
- Unit 19; 20 remainder, 21, 24, 25; August 10–May 31 with a bag limit of 10 wolves.
- Unit 20C in the Stampede road area; August 10–April 15, with a bag limit of 10 wolves.
- Units 26B and 26C, August 10–April 30 with a bag limit of 10 wolves.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The wolf hunting season would begin August 1, which would provide 9 days of additional opportunity to hunters in the fall. The closing dates in the spring would not change.

**BACKGROUND:** This proposal seeks to extend wolf hunting seasons throughout most of Region III in order to decrease wolf predation on sheep and caribou.

Substantially reducing (60–80%) a wolf population for multiple consecutive years can increase survival in moose or caribou populations. In general, wolf harvest throughout Region 3 does not approach this level of harvest, and occurs at sustainable levels.

During Regulatory Year 2014 (RY14; e.g. RY14 = 1 July 2014–30 June 2015) through RY18, an average of 15 wolves/year were taken during August 10–31 (fewer than 1 wolf per day) by hunters throughout Units 19, 20, 21, 24, 25, 26B, and 26C. Increasing the wolf hunting season by 9 days will add opportunity for hunters, and a few more wolves may be harvested.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** the additional harvest opportunity and is **NEUTRAL** on this allocation issue because lengthening the wolf hunting season throughout most of Region 3 will have minimal effect on wolf, sheep, and caribou populations, but would add 9 days of hunter opportunity in August. Changes to the season dates are not expected to significantly change harvest of wolves in these units and there is no biological concern with the wolf populations in these areas.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 49 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.** For the Interior and Eastern Arctic Region, allow the use of crossbows in archery-only hunt areas for hunters possessing permanent identification cards.

**PROPOSED BY:** Jim Sackett

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the use of crossbows in an archery/bow-only area to take big game species by anyone possessing an Alaska permanent identification card and who has completed the crossbow certification course by ADF&G in all of Units 12, 19, 20, 21, 24, 25, and 26B and 26C.

**WHAT ARE THE CURRENT REGULATIONS?**



5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game are prohibited:

(11) with the use of a crossbow in any restricted weapons hunt that authorizes taking by bow and arrow;

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

(3) with a longbow, recurve bow, or compound bow, unless the

(A) bow is not less than

(i) 40 pounds peak draw weight when hunting black-tailed deer, wolf, wolverine, black bear, Dall sheep, and caribou;

(ii) 50 pounds peak draw weight when hunting mountain goat, moose, elk, brown/grizzly bear, musk ox, and bison;

(B) arrow is tipped with a broadhead and is a minimum of 20 inches in overall length and is a minimum of 300 grains in total weight;

(C) repealed 7/1/2012

(D) hunter has successfully completed a department-approved bowhunter education course for any restricted weapons hunt that authorizes taking by bow and arrow;

5 AAC 92.990. Definitions.

(11) “bow” means a long bow, recurve bow, or compound bow that is a device for launching an arrow which derives its propulsive energy solely from the bending and recovery of two limbs, and that is hand-held and hand-drawn by a single and direct pulling action of the bowstring by the shooter with the shooter’s fingers or a hand-held or wrist-attached release aid; the energy used to propel the arrow may not be derived from hydraulic, pneumatic, explosive, or mechanical devices, but may be derived from the mechanical advantage provided by wheels or cams if the available energy is stored in the bent limbs of the bow; no portion of the bow’s riser (handle) or an attachment to the bow’s riser may contact, support, or guide the arrow from a point rearward of the bowstring when strung and at rest; “bow” does not include a crossbow or any device that has a gun-type stock or incorporates any mechanism that holds the bowstring at partial or full draw without the shooter’s muscle power;

(19) “crossbow” means a bow, mounted on a stock, which mechanically holds the string at partial or full draw, that shoots projectiles which are generally called bolts or quarrels;

There are no archery-only areas within Units 12, 19, 21, 25B, 25C, and 26C. Archery-only areas within Units 20, 24A, 25A, and 26B include the following:

- Dalton Highway Corridor Management Area in Units 20F, 24A, 25A, 25D
- Fairbanks Management Area in Unit 20B
- Healy–Lignite Management Area in Unit 20A
- 1 targeted moose hunt (AM751; bow and arrow only) occurring in the remainder of Fairbanks Management Area in Unit 20B (outside Creamer’s Field Migratory Waterfowl Refuge).
- the Lost Lake Closed Area in Unit 20B.

In addition, portions of the Middle Fork of the Chena River and the upper Salcha River are open for short archery-only moose seasons following the closure of the regular moose season.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about hunting seasons in Units 12, 19, 20, 21, 24, 25, 26B and 26C.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If the proposal were adopted, resident hunters who are 60 years or older and in possession of a permanent hunting, fishing, and trapping license would be able to use a crossbow in archery-only hunts in Units 12, 19, 20, 21, 24, 25, 26B, and 26C. A person in this age category would no longer need to apply for a methods and means exemption per 5 AAC 92.104 to use a crossbow for these hunts.

**BACKGROUND:** Currently, a person who is physically disabled and unable to use a bow may apply for a methods and means exemption permit, which allows him or her to use a crossbow in an archery-only hunt. A crossbow’s effective shooting range is similar to a bow and arrow. Crossbows and bows deliver similar kinetic energy to the target. A crossbow’s bolt travels approximately 300 feet per second (fps) with a 420-grain bolt, and generates 86.78 foot-pounds of kinetic energy, while a compound bow shooting a 350-grain arrow travelling 335 fps generates 87.24 foot-pounds of energy.

The minimum draw weight requirements for bow and arrow are 40- or 50-pounds, depending on the species hunted. The technology of modern archery equipment makes it easier to reach the minimum draw weights required to hunt big game in Alaska. With archery equipment, the hunter must physically hold the bow in the cocked position, whereas a crossbow uses a cocking device that cocks the bow and holds it in the cocked position until the hunter pulls the trigger.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of hunting opportunity to a subset of hunters. If the proposal is adopted, the board may wish to consider allowing those residents with disabled veteran hunting and trapping licenses to be granted the same automatic allowance as those with permanent identification cards over the age of 60.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 50 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish registration archery-only hunts for bull moose in the Interior and Eastern Arctic Region Units that have general moose seasons.

**PROPOSED BY:** The Alaskan Bowhunters Association

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would create a bowhunting-only registration permit and extend the moose season by 10 days in all areas throughout the region where hunting seasons are currently managed through a harvest ticket. The new season would begin the day after each harvest ticket season ends. The proponent requests that only conventional bows be allowed. The current antler restrictions or sex requirements would remain in place.

**WHAT ARE THE CURRENT REGULATIONS?** Harvest ticket moose hunting seasons in Region III start as early as August 15 (Unit 20D–Healy River drainage) and end as late as February 29 (25D remainder) with a wide variation among these hunts in season length and required antler configurations.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about hunting seasons in Units 12, 19, 20, 21, 24, 25, 26B and 26C.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Effects of this proposal range from providing more hunting opportunity to creating user conflict and declines in bull-to-cow ratios. This broad proposal has the potential to affect the management regimes in place that address increasing, decreasing, or stable moose populations with varying sex ratios and health or habitat assessments, as well as varying levels of hunting pressure.

**BACKGROUND:** Such season extension and allocation issues are best addressed at a population level. Broadly applying a 10-day registration permit season extension to follow all harvest ticket moose hunting opportunities in Region III could alter the ability of biologists to manage for maximum sustained yield. Moose densities and hunter numbers vary throughout the 247,292 mi<sup>2</sup> in Region III, depending on natural factors, as well as distance to population centers, and hunter accessibility. While some moose populations may withstand (or even benefit from) additional harvest, some are likely to suffer adverse effects of increased harvest. For example, in some areas managers are actively trying to reduce or slow harvest to conserve bull-to-cow ratios (e.g., easily accessible portions of Unit 20B) and in other areas managers are actively trying to manage cow harvest (e.g., southwestern Unit 20D) to maintain the moose population within carrying capacity.

The department recognizes that harvest from a 10-day conventional archery season extension would likely be low in most places. However, 10-day extensions occurring during peak rut when bull moose are most susceptible to harvest could lower bull-to-cow ratios in areas that need stability or growth.

Area biologists use the current regulations as a management tool to maximize hunting opportunity while managing for optimum population size for available habitat. This includes analyses of long-term survey and inventory datasets, harvest records, and research.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal because not all moose populations in Region III can sustain more harvest. However, the department is **NEUTRAL** regarding allocation of harvest between user groups. Some of the moose populations (outside the Fairbanks Nonsubsistence Area) have positive C&T findings, so if

currently existing seasons were to change, the board would need to consider if the new regulations still provide a reasonable opportunity for subsistence uses of moose.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 51 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Remove the bag limit restriction of one sheep every four years for nonresidents over the age of 60 for the Interior and Eastern Arctic Region.

**PROPOSED BY:** Hunter and Gatherers Lives Matter

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would allow any nonresident over the age of 60 to harvest one legal ram every year rather than every four years.

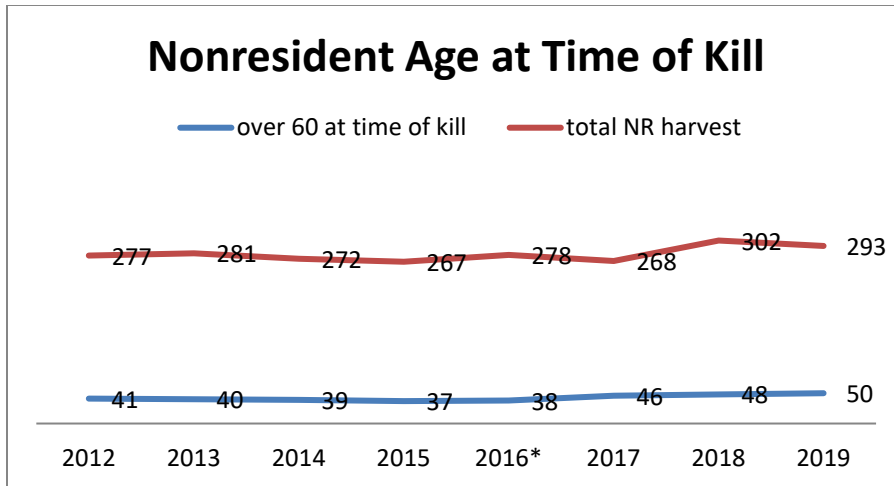
**WHAT ARE THE CURRENT REGULATIONS?**

- **Resident hunters:** Drawing hunts in the Mt. Harper Area and the Delta Controlled Use Area (DCUA) and all harvest ticket Dall sheep hunts in the region have a bag limit of one full-curl ram per regulatory year. The Tok Management Area (TMA) drawing permit hunts (DS102 and DS103) have a bag limit of one ram every 4 regulatory years.
- **Nonresident hunters:** All harvest ticket and drawing permit hunts for Dall sheep in the region have a bag limit of one full-curl ram every four years. This bag limit was established by the board during the 2016 statewide meeting.
- Unit 19 sheep, as well as sheep populations in the DeLong, Baird, and Schwatka mountains, and sheep in the Brooks Range all have positive C&T findings, with varying ANSs.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal affects successful nonresident sheep hunters that are 60 years or older who want to hunt sheep more frequently than once every four years. It allows nonresidents that are 60 years or older to apply for permits and take a sheep more frequently than allowed under the current bag limit (one sheep every four years).

**BACKGROUND:** The full-curl bag limit provides maximum participation in sheep hunts and has not been linked to any negative effects on the sheep population or lamb production.

Between RY15 – RY19, a total of 1,055 rams with an average of 211 per year were harvested by nonresidents in Region III. Statewide, 4.5% of successful nonresidents returned to Alaska to hunt sheep within 4 years of successfully harvesting a ram.



**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of sheep hunting opportunity for residents and nonresidents. No conservation concerns are addressed or created by this proposal, and the department does not have conservation concerns with the current hunt management structure.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 52 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Change the nonresident general season sheep hunts in Unit 19C and Unit 20 remainder to drawing permit hunts.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the nonresident harvest ticket sheep hunts in Units 20 remainder and 19C to drawing permit hunts and limit the allocation of nonresident permits to 50 permits for each hunt. Residents would continue to hunt under harvest ticket or registration permit (RS380) in Unit 19C and under harvest tickets in Unit 20 remainder.

**WHAT ARE THE CURRENT REGULATIONS?** Currently, nonresidents may hunt sheep in Unit 19C and Unit 20 remainder with a harvest ticket. The nonresident bag limit is one ram with full-curl horn or larger every 4 regulatory years. Season dates are as follows:

- August 1–5 (Youth hunt only)
- August 10–September 20

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

Nonresidents would be required to obtain a drawing permit for Units 20 remainder and 19C and only 50 permits would be available for each hunt. Adoption of this proposal would reduce

nonresident hunter opportunity. In Units 19C and 20 nonresidents hunters take an estimated 44% (116 sheep) of the total harvest. Based on current harvest data, reducing the number of sheep available for nonresident harvest to 50 animals/permits would equate to an estimated 19% of the current harvest.

**BACKGROUND:** Board Finding 2017-222-BOG indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 or more years. Nonresident hunting for sheep in Unit 19C and Unit 20 remainder is currently managed using harvest tickets. Guided hunts are common throughout the area and issues of crowding, hunt quality, and restricted access are common. A little less than half of the sheep hunters in Unit 19C are guided nonresidents with an average of 85 nonresidents taking 64 sheep per year during RY15–RY19. An average of 92 resident hunters took 36 sheep per year during the same time frame. Currently, nonresident sheep hunters in Unit 19C take 64% of the sheep harvested each year and are almost twice as successful as resident hunters. Approximately 18% of sheep hunters in Unit 20 remainder are guided nonresidents with an average of 73 nonresidents taking 52 sheep per year during RY15–RY19. An average of 328 residents took 111 sheep per year during the same time frame. Currently, nonresident sheep hunters in Unit 20 remainder take 42% of the sheep harvested each year and are more than twice as successful as resident hunters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative proposal. This proposal would reduce nonresident opportunity in both locations. There is no biological concern with the current hunt management structure and full curl bag limit.

**COST ANALYSIS:** Adoption of this proposal would result in minimal additional costs for the department.

\*\*\*\*\*

**PROPOSAL 53 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Establish an archery only registration permit hunt for Dall sheep in the Interior and Eastern Arctic Region.

**PROPOSED BY:** The Alaskan Bowhunters Association

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would create a conventional archery only sheep registration permit and add 10 days to the beginning of the season in all areas where there is a general harvest ticket sheep hunt.

**WHAT ARE THE CURRENT REGULATIONS?** Opportunity for all residents and nonresidents is as follows:

- Resident and nonresident hunters may hunt using harvest tickets in most of the region during August 10–September 20.
- Nonresident hunters may harvest one full-curl ram every 4 years.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about all sheep hunting seasons in the Interior–Eastern Arctic Region.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal creates a registration permit for a conventional archery only sheep season in all harvest ticket hunt areas throughout the region with a season of August 1–9. The new season would overlap with the youth sheep hunt (August 1–5), which allows the use of firearms. The proponent requests that only conventional bows be allowed (not crossbows or other primitive weapons). Adoption of this proposal is unlikely to result in a significant increase in sheep harvest; however, user conflicts may result with overlapping firearm seasons (i.e., youth hunt).

**BACKGROUND:** This proposal is not likely to affect sheep populations because the current full-curl bag limit adequately guards against overharvest. Allocating additional hunting opportunity could increase sheep harvests, but it is difficult to predict how many hunters will participate in the hunt and how successful they will be.

Some sheep hunts have season dates and bag limits that provide a reasonable opportunity for success in harvesting a sheep for subsistence uses. All of these hunts are by harvest ticket or registration permit.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of sheep hunting opportunity between archers and hunters who use other methods of taking sheep. No biological concerns are addressed or created by this proposal because the requirement to harvest full-curl rams should prevent overharvest from affecting sustainability of sheep populations. If adopted, the record should show that the board has determined that the new regulations continue to provide a reasonable opportunity for success in customary and traditional uses of Dall sheep in units with positive customary and traditional use findings.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 54 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.** Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** The proposal would reauthorize the current resident tag fee exemptions for brown bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

**WHAT ARE THE CURRENT REGULATIONS?** Brown bear tag fees and locking tags are not required for residents in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

The customary and traditional use findings and amounts reasonably necessary for subsistence are presented below:

**Table 54-1.–Customary and traditional uses of brown bear populations, Region III:**

<b>Unit</b>	<b>Finding</b>	<b>Amount reasonably necessary for subsistence</b>
Unit 12	Negative	---
Unit 17B, that portion not draining into the Nuyakuk and Tikchik Lake, Unit 17C, Units 19A and 19B upstream of and excluding the Aniak River drainage, and Unit 19D	Positive	10–15
Units 19A and 19B downstream of and including the Aniak River drainage	Positive	5
Unit 19C	Negative	---
Unit 19D	Positive	2–6
Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Use Area and Unit 20C	Positive	1–3
Unit 20D, outside the boundaries of the Fairbanks Nonsubsistence Area	Positive	1–2
Unit 20E	Negative	---
Units 21 and 22	Positive	20–25
Units 23, 24, and 26	Positive	25–35
Unit 25A, 25B, 25C	Negative	---
Unit 25D	Positive	---

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The \$25 resident tag fee exemption would be continued for brown bear hunts in Units 12, 19, 20, 21, 24, 25, 26B, and 26C, including subsistence registration hunts.

**BACKGROUND:** The Board of Game must annually reauthorize all resident tag fee exemptions. Resident brown bear tag fees were put in place statewide during the mid-1970s to discourage incidental harvest, elevate the status of brown bears to trophies, and to provide revenue. Today, Region III populations are healthy, brown bears are highly regarded as trophies, and season dates and bag limits effectively regulate harvest. Reauthorizing these tag fee exemptions would allow residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, to opportunistically and legally harvest brown bears.

Eliminating all resident brown bear tag fees throughout Region III simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization would assist with the objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically. During regulatory years 2006–2015 approximately 22% of brown bears harvested by resident hunters in Region III were taken incidentally to other activities, compared with 9% statewide.



The department estimates that a harvest rate of up to 8%, composed primarily of males, is sustainable. Human-caused mortality in most of Region III has been consistently less than 6% of the population. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are effectively managed through changes in seasons and bag limits. Resident tag fees that were in place prior to 2010 appeared to have no effect on harvest rates in these areas.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Brown bear numbers appear to be stable in the Interior and Northeast Arctic region. Resident tag fees that were in place prior to 2010 appeared to have no effect on harvest rates in the region. Therefore, this proposal does not present a biological concern. As part of this request to reauthorize exemption of resident brown bear tag fees throughout Region III, the department recommends that the board, at a minimum, continue to reauthorize the tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 55 – 5 AAC 92.085(5). Unlawful methods of taking big game; exceptions.**  
Allow the use of dogs for hunting lynx in Units 12 and 20.

**PROPOSED BY:** Tyler OBrien

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would create a resident and nonresident season for using hounds to aid in hunting lynx starting October 15 and ending December 31 in Units 12 and 20. This new season would be under the same bag limit restriction as the general trapping season.

**WHAT ARE THE CURRENT REGULATIONS?** Dogs may not be used to pursue lynx under current hunting or trapping regulations.

The lynx hunting season in Units 12 and 20 are:

- Unit 12 and 20E: Two lynx, November 1–March 15
- Unit 20A, 20B, 20C, 20D, and 20F: Two lynx, December 1–January 31

The lynx trapping season in Units 12 and 20 is:

- Units 12 and 20: no bag limit, November 1–March 15

Lynx must be sealed when taken under either hunting or trapping regulations.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Taking lynx with the aid of hunting dogs would become a legal method in Units 12 and 20 for residents and nonresidents. This method of hunting lynx would begin 2 weeks earlier than other hunting methods in Units 12 and 20E and 6 weeks earlier than other hunting methods in Units 20A, 20B,

20C, 20D, and 20F. This would also begin 2 weeks earlier than trapping seasons open. Adoption of this proposal would likely result in increased harvest. The impacts of this increase are unknown and would depend on the interest and realized effort by lynx hunters and trappers.

**BACKGROUND:** Currently, the earliest hunting season for lynx in Alaska starts on November 1 and lynx hides are rarely prime before November. The proponent suggests the October 15 start date possibly because deep snow and low-temperature conditions that often develop in November are difficult for the type of dogs used to pursue furbearing game species (e.g., bluetick coonhounds, redbone coonhounds, black-mouth curs, etc.) The use of dogs to aid in hunting furbearers is common in the Lower 48. In Alaska it is only allowed for hunting coyotes in Unit 20D (no closed season or bag limit) after registering with the department, and for hunting black bears with a permit issued by the department, and interest for both is consistently low.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal, since it is primarily allocative. If the board considers this method of take, the department recommends aligning season dates with existing hunting or trapping seasons.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 56 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**  
Establish minimum distance requirements for trapping around dwellings in the Interior and Eastern Arctic Region.

**PROPOSED BY:** Doug and Opal Welton

**WHAT WOULD THE PROPOSAL DO?** Prohibit trapping within one mile of a house, cabin, dwelling, or mailbox.

**WHAT ARE THE CURRENT REGULATIONS?** There are currently no regulations regulating the distance a trap can be set from a house, cabin, dwelling, or mailbox. Trapping on private land requires the permission of the landowner.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would make it illegal to trap within one mile of a house, cabin, dwelling, or mailbox in the Interior and Eastern Arctic (Units 12, 19, 20, 21, 24, 25, 26B, and 26C). Landowners with any type of house, cabin, dwelling, or mailbox would no longer be able to use trapping to harvest furbearers or to address wildlife conflicts on their own property.

**BACKGROUND:** There are currently no regulations requiring trapping activity be a certain distance from a house, cabin, dwelling, or mailbox in the Interior and Eastern Arctic. However, trappers are required to obtain permission from private landowners prior to trapping on their land and it is the responsibility of the trapper to understand the land status of the area they trap. Ethical and safe trapping practices are actively encouraged and taught throughout the state by the

Alaska Trappers Association. The department relies heavily upon the experience and collaboration of local trappers to pursue and deal with furbearers with which people have conflicts on a regular basis. Without this relationship, the department would spend an inordinate amount of time and money addressing human-wildlife conflicts.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal, since it is primarily allocative. The department is in general opposed to a reduction in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics. In addition, many wildlife conflict issues are alleviated by licensed trappers taking problem animals near homes and roads. Conflict issues include beavers creating dams and raising water levels into houses and septic systems, beavers cutting down trees in yards, squirrels getting into houses and attics, groundhogs digging into gardens and building foundations, and foxes, coyotes, wolves, weasels, and lynx taking pets and livestock. While some of these could be taken under the defense of life or property law, allowing licensed trappers to take animals with which humans have a conflict under established trapping seasons and bag limits alleviates this issue.

**COST ANALYSIS:** Adoption of this proposal may result in additional costs to the department to deal with human-wildlife conflict issues that licensed trappers currently take under trapping seasons and bag limits.

\*\*\*\*\*

**PROPOSAL 57 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.** Allow the harvest of game from a boat under power in Unit 21.

**PROPOSED BY:** Middle Yukon Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Allow hunters in Unit 21 to harvest game from a boat under power.

**WHAT ARE THE CURRENT REGULATIONS?** Although this proposal addresses all game, there are regulations similar to the requested change specific to big game only, so both regulations are included below.

**5 AAC 92.080 Unlawful methods of taking game; exceptions.** The following methods of taking game are prohibited:

...

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

(A) motor-driven boat may be used as follows:

(i) in Units 23 and 26 to take caribou;

(ii) notwithstanding any other provision in this section, in Unit 22 to position hunters to select individual wolves for harvest;

(iii) under authority of a permit issued by the department

...

**5 AAC 92.085. Unlawful methods of taking big game; exceptions.** The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

(1) with the use of a firearm other than a shotgun, muzzleloader, or rifle or pistol using a center-firing cartridge, except that

(A) in Units 23 and 26, swimming caribou may be taken with a firearm using rim fire cartridges;

...

(7) while a big game animal is swimming, except that a swimming caribou may be taken in Unit 23;

...

(9) from a boat in Units 1–5; however, a person with physical disabilities, as defined in AS 16.05.940 , may hunt from a boat under authority of a permit issued by the department;

...

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal has the potential to increase wounding loss for all game animals by an unknown amount. Harvest of game not correctly identified could potentially increase. Unsafe firearm handling in boats under power is likely to occur and human safety could be impacted.

**BACKGROUND:** Attempting to take big or small game animals from a boat while it is under power is an unsafe hunting practice because shooting from a moving surface is unstable and creates improper balance. This could result in more hunting accidents and increased wounding loss. The ability to make a clean shot and not wound an animal is important to assure that the animal is ethically harvested and not wasted due to inaccurate shooting. The department regularly provides guidance in education courses and produces materials explaining the difficulties and dangers of shooting from a boat, and emphasizes good shot placement as a way of preventing wounding loss.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it is an allocative issue. The board may wish to consider whether adopting this proposal would increase wounding loss or create a public safety issue.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 58 – 5 AAC 92.540. Create a Controlled Use Area in the Kaiyuh Flats area of Unit 21D.** Create a controlled use area in Unit 21D south of the Yukon River to restrict aircraft for moose hunting.

**PROPOSED BY:** Middle Yukon Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal will prevent moose hunters from using aircraft in the portion of Unit 21D south of the Yukon River downstream from Kala Creek. The proposed Controlled Use Area (CUA) would have the same boundaries as the RM831 winter hunt area that was adopted in 2019 in response to the increasing moose population and harvest opportunity.

**WHAT ARE THE CURRENT REGULATIONS?** There is currently no controlled use area restricting means of access in this portion of Unit 21D. Moose hunting regulations are as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(a)		
(19)		
...		

Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek

**RESIDENT HUNTERS:**

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
-----------------------------------------	-------------------------------------

1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder; or	Sept. 5–Sept. 25
-----------------------------------------------------------------------------------------------------------	------------------

1 moose, by registration permit only (RM831), up to 15 days during March, however, a person may not take a cow accompanied by a calf	(Winter season to be announced)
--------------------------------------------------------------------------------------------------------------------------------------	---------------------------------

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 600 permits may be issued in combination	Sept. 5–Sept. 25
------------------------------------------------------------------------------------------------------------------------------------------------------	------------------

with Unit 21D remainder

...

Unit 21D has a positive finding for intensive management (IM), with IM objectives for a population of 7,000–10,000 and harvest of 450–1,000 moose.

The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21, with an established amounts reasonably necessary for subsistence (ANS) of 600–800 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, opportunity to harvest moose could be reduced in the Kaiyuh area for some hunters who only use aircraft for access. The number of aircraft hunters who might shift to other means of access is unknown. If adopted, this proposal has the potential to increase competition among boat hunters on limited navigable waterways, if aircraft hunters begin using boats as a means of transportation.

**BACKGROUND:** The proposed Controlled Use Area (CUA) includes approximately 21% (2,559 mi<sup>2</sup>) of the land in Unit 21D (12,094 mi<sup>2</sup>). Hunter participation in this area has been stable since 2006 (avg. = 181 hunters/75 moose per year). Reported aircraft use makes up 5–6% of the hunting activity, whereas 94–95% of hunters use boats. The moose population in this portion of 21D is increasing, especially the number of cows (Figure 58-1). Current harvest levels are sustainable and the Unit 21 ANS can be provided for by the moose population in Unit 21.

An average of 181 hunters/year harvested an average of 75 moose/year in the proposed CUA during 2006–2018, including an average of 9.8 aircraft hunters who harvested an average of 4.8 moose/year. In addition, 5 cows and 3 bulls were harvested in the initial winter registration hunt (RM831) in March 2019.

The stability of hunter participation and harvest in this area is due to the combination of the drawing and registration permit management strategy, which balances maximum hunting opportunity with public concerns about overcrowding. The drawing permits for the September moose season are limited and available to both residents and nonresidents. The fall registration permits for bull moose are unlimited and available only to resident hunters and require destruction of the trophy value of the antlers. The checker-board distribution of federal lands and a limited number of nonresident drawing permits in the proposed CUA limits guiding activity.

The IM harvest objective has not been met since 2003 when the estimated harvest was 489 moose. The average estimated harvest during regulatory years 2008–2017 was 412 moose, including reported and estimated unreported harvest. The overall Unit 21D population estimate at the end of 2018 was 10,478 moose ( $\pm 1,572$ ). The current estimated combined harvestable surplus is least 1,095 moose for Unit 21.

RM831 has a quota of 25 moose, including up to 20 cows, and is intended to slow growth of this rapidly-increasing population while maximizing hunter opportunity when river ice and daylight conditions are optimal. Moose abundance in this hunt area is estimated at 4,000–4,500 moose (approximately 39–44% of the estimated total Unit 21D moose population).

An analysis of 2001–2018 data from three Trend Count Areas (i.e., Squirrel Creek, Pilot Mtn., and Kaiyuh Slough) shows an increase in the number of moose among all age classes, and a 57% increase over the average count of 748 adult moose for the same timeframe (Figure 58-1).

In addition, analysis of the Geospatial Population Estimator data shows a significant increase: from 1,897 ±11% moose in 2011 to 4,116 ±10% moose in 2017. Analysis of the moose twinning data for the same time frame in the proposed CUA area shows high but stable twinning rates since 2004, indicating that the habitat can support this increasing population. A 265,916 acre wildfire in the Kaiyuh Flats area in 2004 likely explains the increased productivity for the area, and ultimately the increase of the moose population. The graph below shows the average total moose counted from 2001-2018: 748 moose (165 bulls & 583 cows).

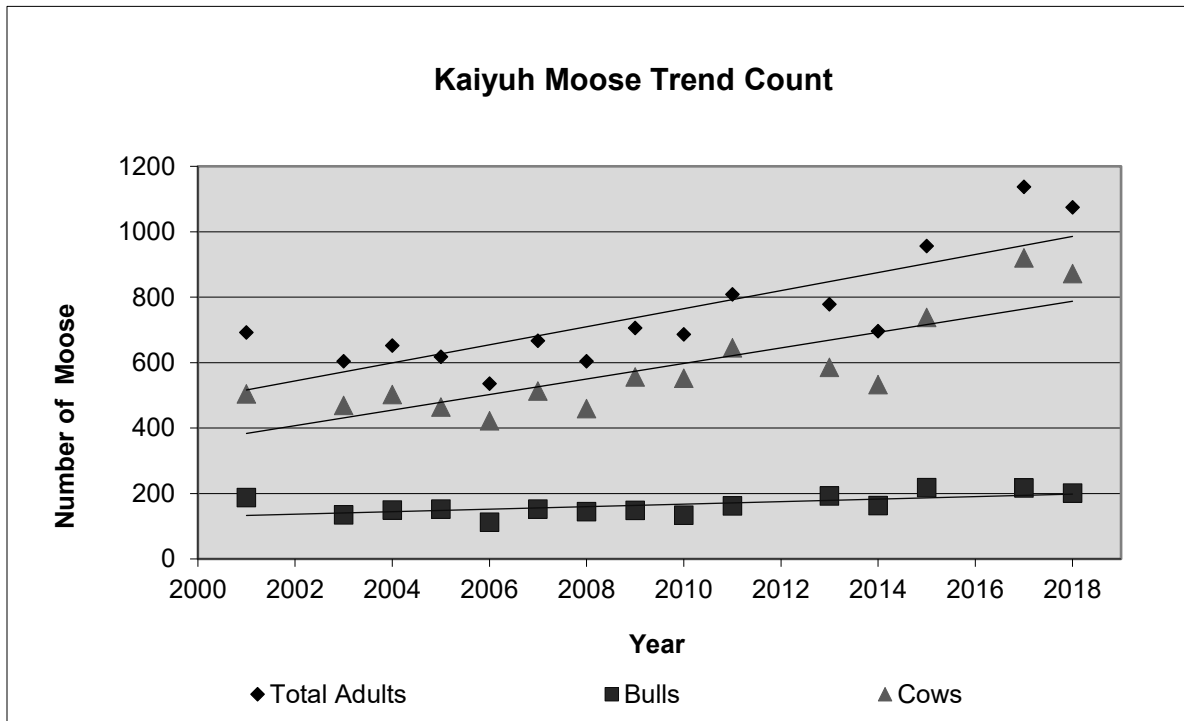


Figure 58-1. Kaiyuh Trend Count Areas combined count of adult moose, 2001–2018, Unit 21D.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal, because this is an allocation issue. If adopted, the board may wish to consider whether this CUA will be in effect during a limited time each year.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 59 – 5 AAC 85.045(19).** Add additional season dates for the RM831 permit in a portion of Unit 21D. Add a December season to the new RM831 antlerless hunt that was adopted by the board at the January 2019 meeting.

**PROPOSED BY:** Western Interior Regional Subsistence Advisory Council

**WHAT WOULD THE PROPOSAL DO?** This proposal would add 15 days in December to the RM831 any-moose winter registration hunt. The proposal requests that the harvest quota established for the winter hunt be made available first in December and if additional harvestable surplus exists at the end of that hunt, then open a March hunt.

**WHAT ARE THE CURRENT REGULATIONS?** The RM831 any-moose season is announced by emergency order in March when conditions allow for good success in harvesting moose and is closed after 15 days or once the quota is reached. This hunt was first opened in 2019.

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

(a)

(19)

...

Unit 21D, that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek

**RESIDENT HUNTERS:**

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
-----------------------------------------	-------------------------------------

1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder; or	Sept. 5–Sept. 25
-----------------------------------------------------------------------------------------------------------	------------------

1 moose, by registration permit (RM831) only, up to 15 days during March, however, a person may not take a cow accompanied by a calf	(Winter season to be announced)
--------------------------------------------------------------------------------------------------------------------------------------	---------------------------------

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side,	Sept. 5–Sept. 25
-------------------------------------------------------------------------------	------------------



by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder

...

Unit 21D has a positive finding for intensive management (IM), with IM objectives for a population of 7,000–10,000 and harvest of 450–1,000 moose.

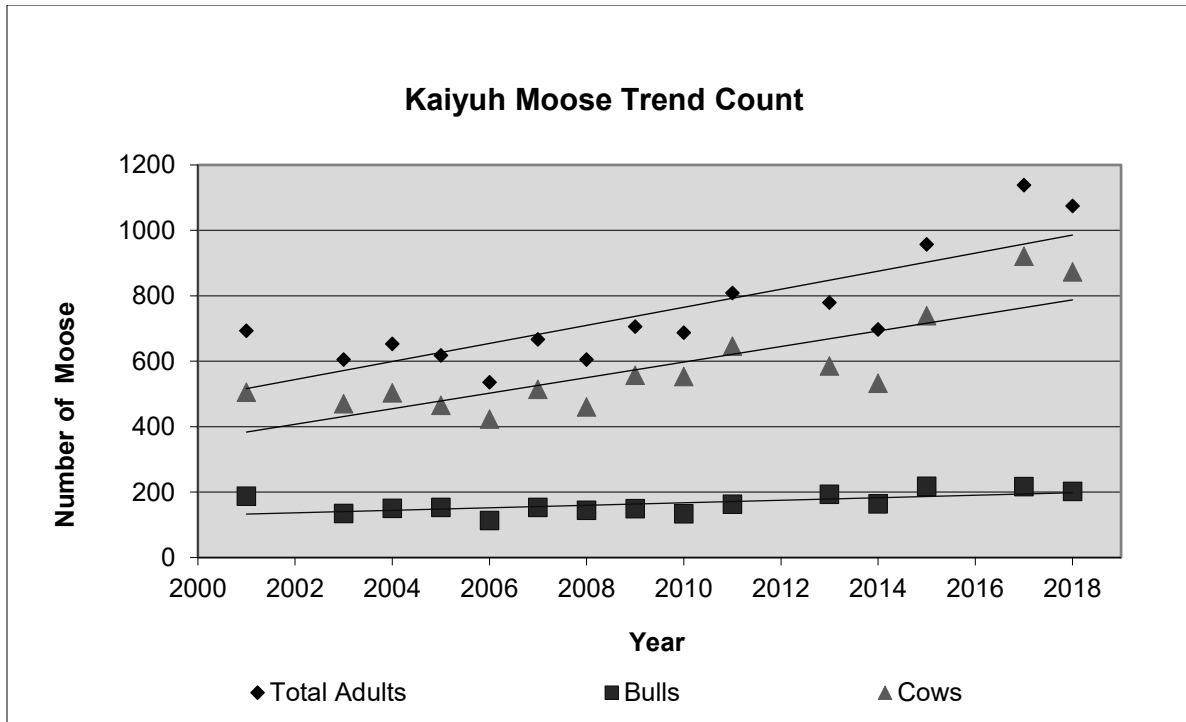
The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21, with an established amounts reasonably necessary for subsistence (ANS) of 600–800 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would add 15 days in December to RM831, before the existing to-be-announced March hunting opportunity. It is unknown if adoption of this proposal would eliminate March hunting opportunity, change the number of days of opportunity, cause harvest in RM831 to increase, or whether additional effects would result. Some large bulls retain their antlers in December, which could generate demand for a December season.

**BACKGROUND:** The goals of the new 15-day to-be-announced March season (RM831) are to provide additional opportunity during a time of year when conditions allow for good success in harvesting moose, slow the growth of this moose population, and to make progress toward achieving the board’s intensive management (IM) harvest objective of 450–1,000 moose in all of Unit 21D by harvesting cows from this highly productive area. Proponents of the new March hunt expressed concern about safety of ice in early winter and lack of snow when the board considered a December option for this hunt.

An analysis of 2001–2018 data from three Trend Count Areas (i.e., Squirrel Creek, Pilot Mtn., and Kaiyuh Slough) shows an increase in the number of moose among all age classes, and a 57% increase over the average count of 748 adult moose for the same timeframe (Figure 58-1).

In addition, analysis of the Geospatial Population Estimator data shows a significant increase: from 1,897  $\pm$ 11% moose in 2011 to 4,116  $\pm$ 10% moose in 2017. Analysis of the moose twinning data for the same time frame in the proposed CUA area shows high but stable twinning rates since 2004, indicating that the habitat can support this increasing population. A 265,916 acre wildfire in the Kaiyuh Flats area in 2004 likely explains the increased productivity for the area, and ultimately the increase of the moose population. The graph below shows the average total moose counted from 2001-2018: 748 moose (165 bulls & 583 cows).



**Figure 59-1. Kaiyuh Trend Count Areas combined count of adult moose, 2001–2018, Unit 21D.**

The IM population objective in Unit 21D is 7,000–10,000 moose; the estimate at the end of 2018 was 10,478 moose ( $\pm 1,572$ ). The RM831 hunt area is approximately 2,559 mi<sup>2</sup> (21%) of the 12,094 mi<sup>2</sup> encompassed by Unit 21D. The current estimated combined harvestable surplus is least 1,095 moose for Unit 21.

Moose abundance in the RM831 hunt area is estimated at 4,000–4,500 moose which is approximately 39–44% of the estimated total Unit 21D moose population. The initial harvest rate in the hunt area is ~0.5% of the pre-hunt estimate (0.9% of estimated number of cows), which is a relatively low rate initially because we intend to slow the rate of increase for the moose population, not stabilize the population. The harvest rate will be adjusted in the future depending on our most recent population estimates and our assessment of carrying capacity, as monitored by twinning surveys. Five cows and 3 bulls were harvested in the initial March 2019 hunt. The department intends to open the hunt again in March 2020, with a 2-day reporting requirement and a quota of 25 moose, including no more than 20 cows.

The IM harvest objective has not been met since 2003 when the estimated harvest was 489 moose.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of this proposal. The newly-implemented RM831 hunt has not been in place long enough to assess its effectiveness. Changing season dates after only one hunting season will affect the department’s ability to evaluate the effectiveness of this new opportunity. The department recommends monitoring the harvest trends and public input for the March 2020 season before implementing a change.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 60** – 5 AAC 85.045 (a)(19). **Reauthorize a winter any-moose season in a portion of Unit 21D.** Reauthorize the antlerless moose hunting season in a portion of Unit 21D.

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** This proposal will reauthorize RM831, the 15-day registration any-moose season to-be-announced during March in a portion of Unit 21D. The season has a harvest quota established by the department prior to the beginning of the season, and if the total harvest or harvest of cows reaches the quota, the season will be closed by emergency order.

**WHAT ARE THE CURRENT REGULATIONS?** The RM831 any-moose season is announced by emergency order in March when conditions allow for good success in harvesting moose and is closed after 15 days or once the quota is reached.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(a)		
(19)		
...		
Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek		

**RESIDENT HUNTERS:**

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder; or	Sept. 5–Sept. 25

1 moose, by registration permit only, up to 15 days during March, however, a person may not take a cow accompanied by a calf

(Winter season to be announced)

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 600 permits may be issued in combination with Unit 21D remainder

Sept. 5–Sept. 25

...

Unit 21D has a positive finding for intensive management (IM), with IM objectives of a population of 7,000–10,000 and harvest of 450–1,000 moose.

The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21, with an established amounts reasonably necessary for subsistence (ANS) of 600–800 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal would continue to allow harvest of cows and antlerless bulls in March when conditions allow for good success in harvesting moose. Because few moose have antlers during March, hunter success is higher with an antlerless season. This will not increase harvest in excess of harvestable surplus, because there is a harvest quota for this hunt.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The goals of this antlerless moose season are to provide additional opportunity during a time of year when conditions allow for good success in harvesting moose, slow the growth of this moose population, and to make progress toward achieving the board’s intensive management (IM) harvest objective of 450–1,000 moose in all of Unit 21D by harvesting cows from this highly productive area. Reauthorizing this hunt will likely make progress toward achieving these goals.

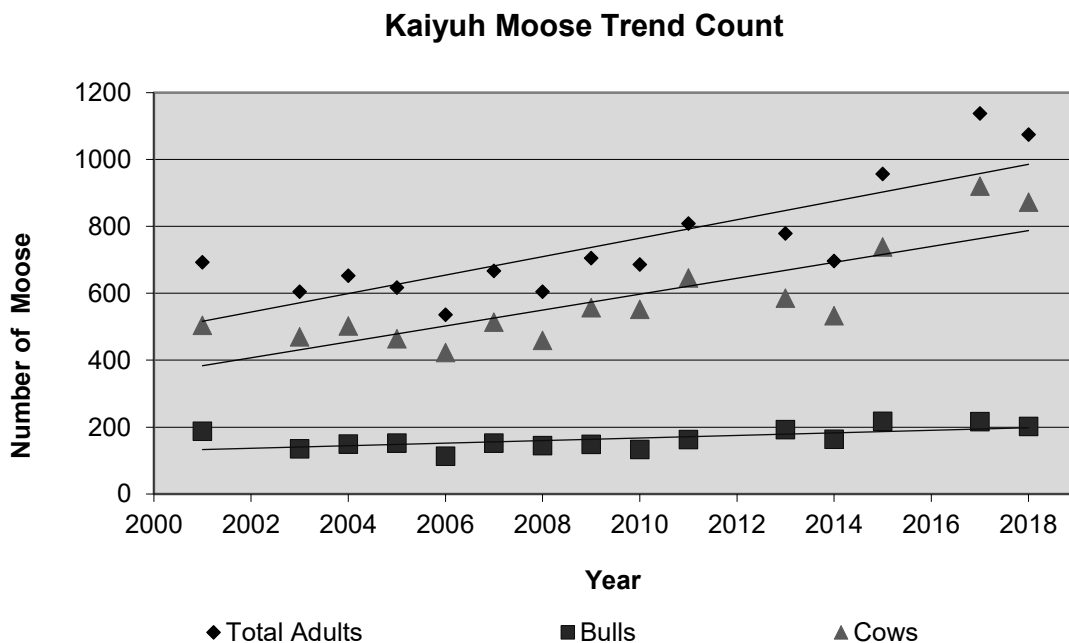
If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost and our ability to meet Intensive Management (IM) harvest objectives could be compromised. In addition, rather than allow large population expansions and contractions, we believe it is important to manage the population for stability and a consistent harvestable surplus.

The department intends to open RM831 in March 2020, with a 2-day reporting requirement and a quota of 25 moose, with no more than 20 cows. Harvest from this hunt will make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. Five cows and 3 bulls were harvested in the March 2019 hunt, and we expect harvest to increase as more hunters begin participating in this hunt.

The IM harvest objective in Unit 21D has not been met since 2003 when the estimated harvest was 489 moose. The average estimated harvest during regulatory years 2008–2017 was 412 moose, including reported and estimated unreported harvest. This is below the IM harvest objective for the Unit 21D moose population of 10,478 moose ( $\pm 1,572$ ). Current harvest levels are sustainable and the Unit 21 ANS can be provided for by the moose population in Unit 21.

This antlerless moose hunt area is approximately 2,559 mi<sup>2</sup> (21%) of the 12,094 mi<sup>2</sup> encompassed by Unit 21D. Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the estimated total Unit 21D moose population.

The moose population in this portion of 21D is increasing rapidly, especially the number of cows in the population (Figure 60-1). An analysis of 2001–2018 data from three Trend Count Areas (Squirrel Creek, Pilot Mtn., and Kaiyuh Slough) shows an increase in moose abundance among all age classes. Geospatial Population Estimate data also show a statistically significant increase: from 1,897 ( $\pm 11\%$ ) moose in 2011 to 4,116 ( $\pm 10\%$ ) moose in 2017. Moose twinning data for the same time frame from the winter any-moose hunt area shows high but stable twinning rates since 2004 (avg. = 38.7%). The graph below shows the average total moose counted from 2001–2018: 748 moose (165 bulls & 583 cows).



**Figure 60-1. Kaiyuh Trend Count Areas combined count of adult moose, 2001–2018, Unit 21D.**

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal. Additional harvest opportunity, including the harvest of cows, exists in this portion of 21D.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 61 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Extend the moose season in Kanuti Controlled Use Area (KCUA) portion of Unit 24B to October 1.

**PROPOSED BY:** Koyukuk River Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** The proposal will add 6 days to the fall moose hunting season in the KCUA portion of 24B.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.540(8)(B), The Kanuti Controlled Use Area** is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, or parts of moose; however, this provision does not apply to the transportation of moose hunters, their hunting gear, or parts of moose by aircraft between publicly owned airports, or the transportation into the area of game meat that has been processed for human consumption. The area consists of that portion of Unit 24 bounded by a line from a point at the northernmost headwaters of Siruk Creek at 66° 48.557' N. Lat., 153° 53.267' W. long., to the highest peak of Double Point Mountain at 66° 40.322' N. lat., 152° 30.132 W. Long., to the northern end of Fish Creek Lake, including all waters of the lake, at 66° 36.071' N. lat., 151° 27.936' W. long., to the east side of Old Dummy Lake, including all waters of the lake, at 66° 08.241' N. lat., 151° 49.276' W. long., to the south end of Lake Todatonten, including all waters of the lake, at 66° 07.556' N. lat., 152° 55.520' W. long., then back to the point of origination at Siruk Creek.

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

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(22)		

...

Unit 24B

**RESIDENT HUNTERS:**

1 bull; or	Sept. 1–Sept. 25
1 antlered bull, by registration permit only	Dec. 15–Apr. 15

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side	Sept. 5–Sept. 25
------------------------------------------------------------------------------	------------------

....

The board has made a positive C&T finding for moose in Unit 24 and an ANS of 170–270 moose.

Unit 24B has a positive finding for intensive management (IM), with IM objectives of a population of 4,000–4,500 and IM harvest objective of 150–250 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adding 6 days of harvest opportunity to the end of the September 1–25 moose season, by extending it to September 1–October 1, would match the federal season. For this population, the 6 days of harvest opportunity during the rut could delay calving. Subsequently, these younger calves would be more prone to winter mortality, likely affecting the ability of this population to meet IM population objectives. Although harvest and hunter success would increase by an unknown amount, but likely by fewer than 10 moose (current daily harvest averages 1.4 moose/day), in the localized area requested by this proposal, an additional 10 moose would result in a harvest rate increase of as much as 1.3–2.5% of the KCUA’s low density moose population.

**BACKGROUND:** The moose population in Unit 24B, including the KCUA, remains at low density. The 2017 estimate of 3,203 ( $\pm 850$ ) observable moose is below the IM population objective of 4,000–4,500 moose (0.29–0.33 moose/mi<sup>2</sup>.) The population in the KCUA portion of Unit 24B increased from 0.22 moose/mi<sup>2</sup> in 2007 (prior to wolf control) to 0.48 moose/mi<sup>2</sup> in 2017, although the Unit 24B moose population outside the wolf control area (which included some state and Alaska Native corporation lands within the KCUA) did not experience a similar increased population density.

Because survival of calves and yearlings is low in this low-density population and the potential for high overwinter mortality exists, the management strategy is conservative and avoids introducing any factors that could potentially disrupt the peak of rut. While productivity in the KCUA is high (average twinning rate is 47%), calf survival to adulthood (reproductive age) is low, with 40 calves and 10 yearling bulls per 100 cows in the fall. Furthermore, while winters 2013–2014 and 2016–2017 were mild, a snowfall of >30-inches in Bettles during early December 2019 illustrates that the potential for high overwinter mortality remains a concern.

The late September hunt proposed would occur during the 10- to 12-day peak in the breeding period of the rut (Miquelle 1991, Van Ballenberghe and Miquelle 1993). Because cow moose estrus lasts only 15–26 hours (Schwartz and Hundertmark 1993), there is a potential of some level of disruption to breeding groups from hunt during that time (Franzman and Schwartz 1998). Satellite bulls seldom stay with harems for long periods (Bubenik 1998), so delayed replacement of harvested harem bulls has the potential to miss the estrus window of the individual cow, or cows may not be receptive to sub-dominant bulls. Mysterud et al. (2002) stated that young bulls may not induce estrus in cows and that calving is delayed with a young male age structure. Therefore, concerns about potential disruption of the peak breeding period is analogous to low bull-to-cow ratios or young-bull age structures in a population that predicts delayed breeding of cows. Furthermore, late born calves are more prone to winter mortality (Schwartz et al. 1994, Keech 2000). Because the amount of potential disruption is unknown, a management strategy to mitigate the effect cannot be planned.

There are 146 days of hunting opportunity in the KCUA portion of Unit 24B under current state moose hunting seasons: during September 1–25, and December 15–April 15. There are an additional 13 days on federal lands (58% of KCUA lands) for federally qualified hunters in that area. Despite the increasing population and high bull-to-cow ratios in the KCUA, federal lands in this area are closed to moose hunting except by federally qualified hunters within the federally defined KCUA, which is larger than the state-defined KCUA. Therefore, there are zero days of opportunity on the federal lands of the KCUA for hunters who are not federally qualified. In the remainder of Unit 24B on federal lands, there are up to 258 days of hunting opportunity for federally-qualified hunters, during August 1–April 15. Moose hunting on these federal lands is closed to the taking of moose except by residents of Unit 24, Koyukuk, and Galena, by state harvest ticket. The department was opposed to the late September–early October federal season with which this proposal seeks to align. We also opposed the federal KCUA closure to non-federally qualified hunters because an opportunity for additional bull harvest exists (although not during the critical 10- to 12-day breeding period).

The board may want to consider the ANS compared to harvestable surplus and harvest history. The average reported harvest for all of Unit 24B during regulatory years 2011 through 2018 (RY2011–RY2018; e.g., RY2011 is 1 July 2011 through 30 June 2012) for all hunters was 35.3 moose/year. Based on Subsistence Division household surveys, including harvest reported on a report form, the estimated average annual harvest is 65 moose, which is below the IM harvest objective of 150–250 moose. Due to incomplete reporting, location of harvest does not allow us to determine the proportion of harvest in 24B that occurs exclusively within the KCUA. Harvest in Unit 24B was stable during this period (Table 61-1). Household subsistence surveys estimated annual harvest by residents of Allakaket and Alatna was 17.7 moose/year during the IM wolf control program conducted during 2011–2017 within the KCUA. The average reported and estimated unreported harvest for all of Unit 24 during RY2009–RY2018 for all hunters was 316 moose/year.



**Table 61-1. Moose harvest in Unit 24B compiled from harvest reporting data collected by the Division of Wildlife Conservation and the Division of Subsistence, RY2011–RY2018.**

Regulatory Year	Allakaket/Alatna Household Surveys	Harvest Reports <sup>b</sup>		
	Estimated Harvest	Allakaket/Alatna harvest reports in 24B	Other Hunters in 24B	All Harvest Reports in 24B <sup>d</sup>
2011	16.2	4	28	32
2012	18.7	13	26	39
2013	11.8	3	24	27
2014	20.0	12	37	49
2015	18.3	7	27	34
2016	20.7	12	20	32
2017	18.0	10	31	41
2018	n/a	7	21	28
Avg.	17.7	8.5	26.8	35.3

<sup>a</sup>Alatna and Allakaket weighted averages calculated from Subsistence Division household surveys.

<sup>b</sup>Unit 24B harvest reported on permits and harvest tickets.

<sup>c</sup>A regulatory year is 1 July to 30 June (e.g., regulatory year 2011 is 1 July 2011 through 30 June 2012)

<sup>d</sup>An unknown amount of moose harvest has been reported on federal harvest reporting mechanisms.

The moose population in Unit 24B is estimated at 2,353–4,053 moose and has trended upward since 2011. The moose population is estimated to be at the lower end or below the population objective of 4,000–4,500 moose. Data suggest mild winters during 2013–2014 and 2016–2017 combined with wolf control during RY2012–RY2016 contributed to the population increase. Although mortality of young is high, bull-to-cow ratios were stable and averaged 62 bulls per 100 cows on the Kanuti National Wildlife Refuge Survey Area in Unit 24B during RY1989–RY2017.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** the additional harvest opportunity and while additional opportunity for bull harvest exists, the critical 10- to 12-day breeding period should be avoided. This proposal would align the state season with the federal season. However, the department is concerned that introducing any factor that may decrease recruitment (such as disruption of the rut) into this low-density population that experiences high natural mortality. Such action has potential to reverse the positive population trend, jeopardizing progress toward meeting the IM objectives.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 62 – 5 AAC 92.069. Special provisions for moose drawing permit hunts.**

Change the permit allocation in Unit 21B (upper Nowitna area) to 90% to residents and up to 10% percent to nonresidents and allocate surplus nonresident drawing permits to resident hunters only.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the current allocation of permits between resident and nonresident hunters in a corridor extending 2 miles on either side of the upper Nowitna River in Unit 21B for drawing permits DM809, DM810, and DM811 to a 90% resident and up to 10% nonresident allocation instead of the current 50% resident and 50% nonresident allocation. The proposal would also require surplus nonresident drawing permits be made available to residents.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.069. Special provisions for moose drawing permit hunts.**

...

(b) The department shall issue permits as follows:

(3) In Unit 21B, that portion within the Nowitna River drainage and within the corridor extending two miles on either side of and including the Nowitna River, the drawing permit hunt is allocated 50 percent to residents and 50 percent to nonresidents; the department shall issue a maximum of 75 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 25 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of nonresidents applying for permits for either nonresident hunt is insufficient to award the required percentage, the department may award the remaining available nonresident drawing permits to the other nonresident hunt;

...

**5 AAC 85.045**

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

(a)

(19)

...

Unit 21B, that portion within the Nowitna River drainages upstream from the Little Mud River drainage and outside a corridor extending two miles on either side of and including the Nowitna River

RESIDENT HUNTERS:

1 bull Aug. 22–Aug. 31  
Sept. 5–Sept. 25

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers Sept. 5–Sept. 25  
with 4 or more brow tines on one side,

Remainder of Unit 21B,

RESIDENT HUNTERS:

1 bull by registration permit Aug. 22–Aug. 31  
only; or Sept. 5–Sept. 25

1 bull by drawing permit only; Sept. 5–Sept. 25  
up to 300 permits may be issued in  
Unit 21B

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers Sept. 5–Sept. 25  
with 4 or more brow tines on one side  
by drawing permit only; up to 300  
permits may be issued in Unit 21B

...

The trophy value of moose taken under the registration hunt (RM834) in the remainder of 21B must be destroyed.

Unit 21B has a positive finding for intensive management (IM), with IM objectives for a population of 4,000–6,000 and harvest of 200–300 moose.

The board made a positive C&T for moose all of Unit 21, with an established ANS of 600–800 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Availability of the limited number of permits for the upper Nowitna hunt area in Unit 21B for drawing hunts DM809, DM810, and DM811 would be allocated 90% to residents and up to 10% for nonresidents. Surplus nonresident drawing permits would be made available to resident hunters instead of to nonresident hunters.

**BACKGROUND:** Unit 21B permits are allocated according to the board’s finding *Nonresident Drawing Permit Allocation Policy* (2007-173-BOG), which requires allocations for specific hunts to be decided individually, based on historic patterns of nonresident and resident use over the past 10 years. The department issues undersubscribed permits in accordance with 5 AAC

92.069 which recognizes the allocation between guided and unguided hunters, and these permits are made available through the Fairbanks ADF&G office similar to registration permits. In 2008, the board allocated 50% of the moose drawing permits to residents (DM810) and 50% to nonresidents (DM809 and DM811). The allocation between residents and nonresidents was decided based on historic patterns of participation. Of the 50% nonresident allocation, 75% of those permits were to be issued to guided nonresidents (DM811) with the remaining 25% to unguided nonresidents (DM809).

The department has issued 20 drawing permits for all 3 hunts combined since the RY09 allocation was implemented (DM809 = 3 permits, DM810 = 10 permits, DM811 = 7 permits). This is consistent with the proportion of resident-to-nonresident hunter participation and harvest during RY1997–RY2006, prior to the implementation of the drawing permit system (Table 62-1).

**Table 62-1. Resident and nonresident moose hunters and harvest in Unit 21B compiled from data collected by the Division of Wildlife Conservation, before and after implementation of drawing permit allocations in regulatory year RY2006<sup>a</sup>.**

Unit and regulatory years	Avg. number of resident hunters	Avg. number of nonresident hunters	Avg. resident harvest	Avg. nonresident Harvest
Unit 21B – All				
1997–2006	168	28	63	11
2007–2018 <sup>b</sup>	195	25	67	10
Upper Unit 21B				
1997–2006	15 (63%)	9 (37%)	8	5
2007–2018 <sup>c</sup>	15 (60%)	10 (40%)	9	6

<sup>a</sup>A regulatory year is 1 July to 30 June (e.g., RY2018 is 1 July 2018 through 30 June 2019)

<sup>b</sup>Includes hunts GM000, RM834, DM802, DM805, DM806, DM808, DM809, DM810, and DM811

<sup>c</sup>Includes hunts GM000, RM834, DM809, DM810, and DM811

The department issued surplus nonresident permits according to regulatory language in 5 AAC 92.069 (Table 62-2). Guided allocation never exceeded 75% and nonguided allocation always had a minimum of 25%.

**Table 62-2. Guided and unguided nonresident moose hunters and harvest in Unit 21B upper Nowitna corridor using harvest reporting data collected by the Division of Wildlife Conservation, regulatory years RY2008–RY2019<sup>a</sup>.**

Regulatory year	DM809 (nonguided)			DM811 (guided)		
	Number of permits	%	surplus	# permits	%	surplus
2009	2	25%	0	6	75%	1
2010	3	30%	0	7	70%	4
2011	3	30%	0	7	70%	0
2012	3	30%	0	7	70%	0

Regulatory year	DM809 (nonguided)			DM811 (guided)		
	Number of permits	%	surplus	# permits	%	surplus
2013	3	30%	0	7	70%	0
2014	3	33%	0	6	67%	1
2015	3	30%	0	7	70%	3
2016	3	30%	0	7	70%	0
2017	3	30%	0	7	70%	2
2018	3	30%	0	7	70%	7
2019	3	30%	0	7	70%	4
average		<b>29.8%</b>			<b>70.2%</b>	

<sup>a</sup>A regulatory year is 1 July to 30 June (e.g., RY2018 is 1 July 2018 through 30 June 2019)

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocation issue. The board may wish to re-evaluate the current allocation pattern based on the updated finding *Nonresident Hunter Allocation Policy (2017-222-BOG)*.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 63 – 5 AAC 92.530. Management areas.** Repeal the Dalton Highway Corridor Management Area regulation.

**PROPOSED BY:** Fairbanks Fish & Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** The proposal would repeal the Dalton Highway Corridor Management Area in 5 AAC 92.530(7).

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.530. Management areas.**

...

(7) the Dalton Highway Corridor Management Area:

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

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

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

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

(1) Dalton Highway,

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

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

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

(5) the Sagavanirktok River access road two miles north of Pump Station 2, and

(6) any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;

(ii) aircraft and boats may be used;

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

(iv) game may be transported by motorized vehicle unless prohibited by statute;

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

...

AS 16.05.789. Prohibition on hunting adjacent to highway between Yukon River and Arctic Ocean.

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

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

AS 19.40.210. Prohibition of off-road vehicles.

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

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

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

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

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

(A) is located outside the corridor; and

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

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

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

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Repeal of the DHCMA will reduce the number of inadvertent violations that are occurring. It will also reduce confusion for hunters and trappers who do not understand what actions are specifically allowed and not allowed in the DHCMA. Because this regulation is largely redundant with Alaska Statutes, use of motorized vehicles by hunters and trappers will continue relatively unchanged.

**BACKGROUND:** The department has no biological concerns for game populations that are a result of hunting, trapping, and transportation methods used by hunters and trappers within the DHCMA. Hunting and trapping are managed effectively by seasons and bag limits within the DHCMA and in adjacent game management units.

There is public confusion and frustration with inconsistent agency interpretation of the multi-tiered legal framework. Redundant state and federal laws defining use of the DHCMA are complex and not always clearly in alignment with one another. For nearly 40 years significant improvement and expansion of the corridor’s road system occurred, which has broadened the public’s expectations of which uses within the corridor should be allowed under the law. For example, members of the public expect to be able to drive vehicles to Nuiqsut, Bettles, Coldfoot, Wiseman, or Anaktuvuk Pass, and subsequently hunt (a violation of the DHCMA regulation), similar to the ability to drive to Galbraith Lake and hunt. Consequently, the public experiences confusion and frustration with the complexity of the management regime, resulting in frequent and inadvertent violations within the DHCMA.

The DHCMA in Units 20, 24, 25, and 26 extends 5 miles from each side of the Dalton Highway, from the Yukon River to the Arctic Ocean, and includes the Prudhoe Bay Closed Area. The initial reference to the DHCMA occurred in 1974 when the department issued an Emergency Order defining the corridor and the accompanying restrictions that closed the area to big game hunting. Emergency regulations were adopted in 1978. In 1980, the Alaska State Legislature promulgated the DHCMA in Alaska statutes AS 19.40.210 and AS 16.05.789, and in 1983 the board adopted the DHCMA hunting regulations in 5 AAC 92.530(7). Since 1983, the Legislature and the board have enacted multiple changes to these statutes and regulations.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal. If the regulation is not repealed or regulations and statutes substantially revised, enforcement is likely to become more controversial as the extent of violations becomes more apparent to the public (e.g., hunters driving to the Coldfoot airstrip to originate a hunt, or people driving home to Nuiqsut and subsequently hunting). There are no biological concerns for wildlife; however, the complexity of regulations associated with the corridor results in confusion by various user groups. Two options could reduce confusion and clarify legal uses by hunters and trappers in the DHCMA. Repeal of the DHCMA would eliminate one layer of redundancy in the laws. A second option would be to revise the DHCMA regulation so that it uses exactly the same terms as statutes. This could reduce the number of inadvertent violations that result from confusion with current Alaska statutes and would not change existing uses. Neither repeal nor revision of the regulation would result in increased use by hunters and trappers, because statutes and land management regulations are redundant. Land management agencies are better suited than the board or the department to regulate land access. This would allow the board and the department to change seasons and bag limits, if needed, to manage wildlife population in the DHCMA.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 64 – 5 AAC 92.530. Revise the Dalton Highway Corridor Management Area.** Revise the Dalton Highway Corridor Management Area regulation.

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** The proposal is seeking clarification from the board, and input from the public regarding what both would like to see in regulation regarding the stretch of land within five miles of either side of the James Dalton Highway between the Yukon River and the Arctic Ocean,

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.530. Management areas.**

...

(7) the Dalton Highway Corridor Management Area:



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

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

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

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

(1) Dalton Highway,

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

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

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

(5) the Sagavanirktok River access road two miles north of Pump Station 2, and

(6) any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;

(ii) aircraft and boats may be used;

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

(iv) game may be transported by motorized vehicle unless prohibited by statute;

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

...

AS 16.05.789. Prohibition on hunting adjacent to highway between Yukon River and Arctic Ocean.

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

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

AS 19.40.210. Prohibition of off-road vehicles.

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

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

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

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

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

(A) is located outside the corridor; and

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

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

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

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Revising the DHCMA regulation will reduce the number of inadvertent violations that are occurring. It will also reduce confusion for hunters and trappers who do not understand what actions are specifically allowed and not allowed in the DHCMA. Because the regulation is largely redundant with Alaska Statute, use will continue relatively unchanged.

**BACKGROUND:** The department has no biological concerns for game populations that are a result of hunting, trapping, and transportation methods used by hunters and trappers within the DHCMA. Hunting and trapping are managed effectively by seasons and bag limits within the DHCMA and in adjacent game management units.

There is public confusion and frustration with inconsistent agency interpretation of the multi-tiered legal framework. Redundant state and federal laws defining use of the DHCMA are complex and not always clearly in alignment with one another. For nearly 40 years significant improvement and expansion of the corridor's road system occurred, which has broadened the public's expectations of which uses within the corridor should be allowed under the law. For example, members of the public expect to be able to drive vehicles to Nuiqsut, Bettles, Coldfoot, Wiseman, or Anaktuvuk Pass, and subsequently hunt (a violation of the DHCMA regulation), similar to the ability to drive to Galbraith Lake and hunt. Consequently, the public experiences confusion and frustration with the complexity of the management regime, resulting in frequent and inadvertent violations within the DHCMA.

The DHCMA in Units 20, 24, 25, and 26 extends 5 miles from each side of the Dalton Highway, from the Yukon River to the Arctic Ocean, and includes the Prudhoe Bay Closed Area. The initial reference to the DHCMA occurred in 1974 when the department issued an Emergency Order defining the corridor and the accompanying restrictions that closed the area to big game hunting. Emergency regulations were adopted in 1978. In 1980, the Alaska State Legislature promulgated the DHCMA in Alaska statutes AS 19.40.210 and AS 16.05.789, and in 1983 the board adopted the DHCMA hunting regulations in 5 AAC 92.530(7). Since 1983, the Legislature and the board have enacted multiple changes to these statutes and regulations.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to reduce confusion and clarify legal uses by hunters and trappers in the DHCMA. Revision of the regulation so that it uses exactly the same terms as statutes could reduce the number of inadvertent violations that result from confusion with current Alaska statutes and would not change existing uses. Repeal of the DHCMA would eliminate one layer of redundancy in the laws. Neither revision nor repeal of the regulation would result in increased use by hunters and trappers, because statutes and land management regulations are redundant. Land management agencies are better suited than the board or the department to regulate land access. This would allow the board and the department to change seasons and bag limits, if needed, to manage wildlife populations in the DHCMA.

If the regulation is not repealed or substantially revised, enforcement is likely to become more controversial as the extent of violations becomes more apparent to the public (e.g., hunters driving to the Coldfoot airstrip to originate a hunt, or people driving home to Nuiqsut and subsequently hunting).

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 65 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Establish a new, resident only, general season hunt for caribou in Unit 20F.

**PROPOSED BY:** Tanana–Rampart Manley Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** The bag limit for caribou in Unit 20F North of the Yukon River (excluding the Dalton Highway Corridor Management Area) for residents would

increase to 2 caribou total during August 10–March 31, only one of which could be taken before November 1.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(a)		
(15)		
...		
Unit 20(F), north of the Yukon River		
RESIDENT HUNTERS		
1 caribou	Aug. 10–Mar. 31	
NONRESIDENT HUNTERS		
1 caribou		Aug. 10–Sept. 30
...		

There is a positive C&T finding for caribou in Units 20F, 21B, 21C, 21D and 24, with an ANS of 150–200. These C&T and ANS findings are for the Galena Mountains, Wolf Mountains, and Ray Mountains herds combined.

There is a negative Intensive Management (IM) finding for the Ray Mountains herd. There are also negative IM findings for the Galena Mountains and Wolf Mountains herds.

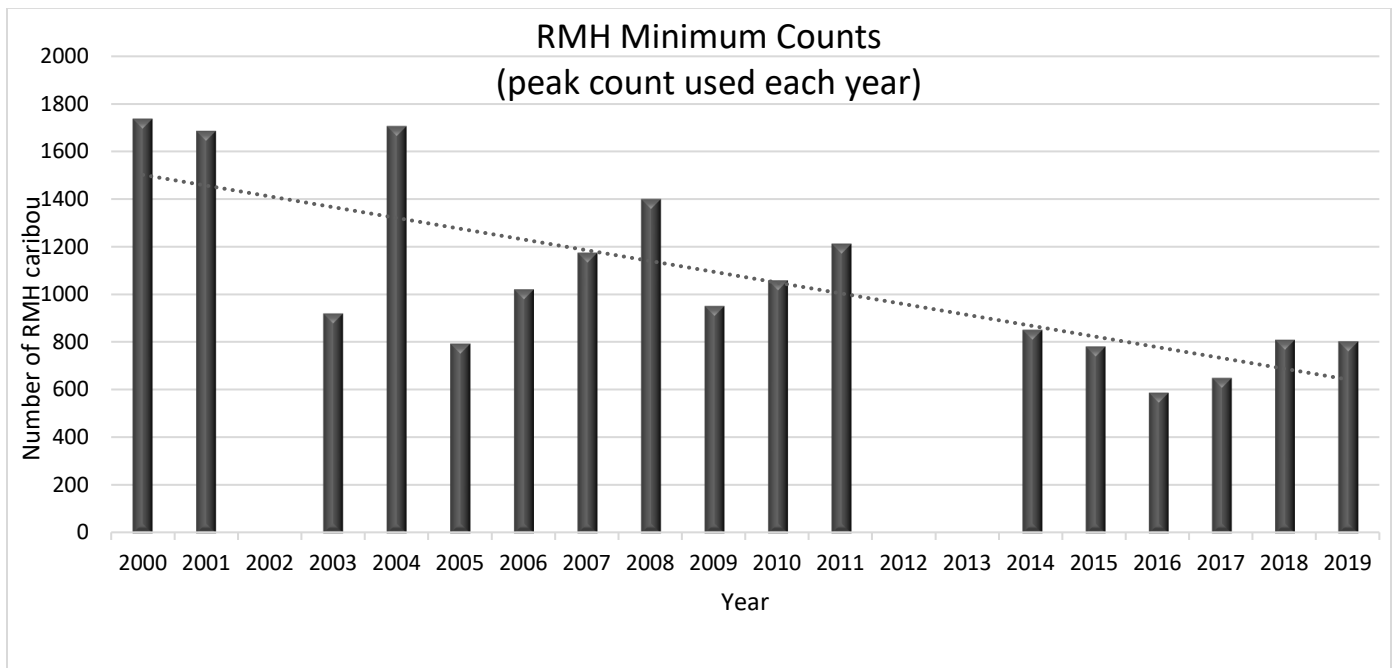
**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, caribou harvest by residents who hunt the RMH in Unit 20F could increase.

**BACKGROUND:** There is limited information available for the RMH, therefore it is managed conservatively. Despite conservative management and low reported harvest, minimum population counts indicate that the RMH has been declining since 2000 (Figure 65-1). Furthermore, these minimum counts declined from 1,213 to 679 caribou between 2011 and 2019, indicating that the RMH cannot sustain additional harvest. During 2000–2011 the average peak count was 1,242 caribou. During 2014–2019 the average peak count was 749 caribou, a 40% decrease in the peak minimum counts.

Small herds such as the RMH are usually predator limited and have low recruitment rates. Therefore, the department estimates the harvestable surplus at 2–3% of the estimated population (a lower rate than larger herds.) This allows for a total harvest of 15–20 caribou per year.

Unreported harvest is a concern. The requirement that residents who live north of the Yukon River must obtain caribou harvest tickets was first implemented in 2016 and it is likely that not all local residents are aware of this regulatory change. An estimated 3–5 caribou are harvested from the Rampart–Tanana portion of the Yukon River and an additional 5–7 are harvested using snowmachines in the winter. Subsistence household surveys indicate that 8–13 caribou were potentially harvested annually in Unit 24B during 2013–2017 within the range of the RMH (Brown et al. 2016.)

Hunting mortality appears to be low. The annual reported harvest from the RMH was 0–10 caribou (average = 3.6) during regulatory years 2013 through 2017 (RY13–RY17; i.e., RY13 = July 1, 2013 through June 30, 2014). However, combined with estimated unreported harvest, the estimated harvestable surplus is being exceeded (Figure 65-2).



**Figure 65-1. Ray Mountains Caribou Herd minimum counts 2000–2019 (missing data indicates years without surveys).**

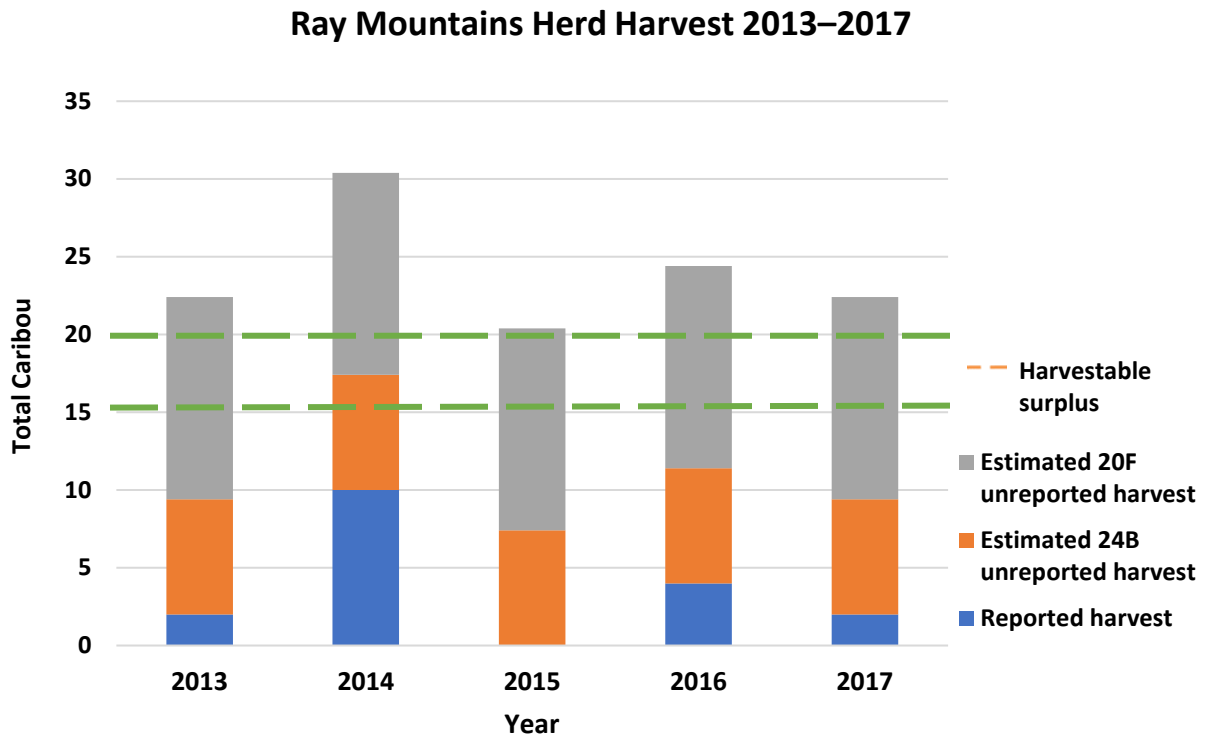


Figure 65-2. Ray Mountains Caribou Herd Harvest 2013–2017.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal because there is a harvestable portion of approximately 15–20 caribou per year and total harvest likely exceeds the harvestable surplus. The department has conservation concerns regarding this herd, will continue to monitor the population, and will submit a proposal should the bag limit or season dates need adjusting in the future. If outside the Board cycle the Department can use its Emergency Order authority to restrict or close hunting if necessary for conservation.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 66 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Extend the season dates and reduce the bag limit for caribou in Unit 24A remainder.

**PROPOSED BY:** Sean Timmons

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to reduce the resident bag limit for caribou and extend the season from July 1–April 30 to July 1–May 15 in Unit 24A remainder (north of the south bank of the Kanuti River).

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(a)		
(19)		
...		
Remainder of Unit 24A (North of the south bank of the Kanuti River)		
RESIDENT HUNTERS: 10 caribou	July 1–Apr. 30	
NONRESIDENT HUNTERS: 2 bulls		Aug. 1–Sept. 30
...		

There is a positive C&T finding for the Galena Mountains, Wolf Mountains, and Ray Mountains caribou herds combined in Units 20F, 21B, 21C, 21D and 24, with an ANS of 150-200.

There is a positive C&T finding for the Porcupine Caribou Herd (PCH) in Units 25A, 25B, 25D, 26B and 26C, with an ANS of 1,250–1,550.

There is a positive C&T finding for the Western Arctic Caribou herd (WAH) and Teshekpuk Lake Caribou herd (TCH) combined in Units 21, 22, 23, 24, and 26, with an ANS of 8,000-12,000.

There is a positive C&T finding for the Central Arctic Caribou herd (CAH) in Unit 26B with an ANS of 250-450.

There is a negative Intensive Management (IM) finding for the Ray Mountains herd. There are also negative IM findings for the Galena Mountains and Wolf Mountains herds. There is a positive IM finding for the PCH with a population objective of 100,000-150,000 and a harvest objective of 1,500-2,000. There is also a positive IM finding for the WAH with a population objective of at least 200,000 and a harvest objective of 12,000-20,000. There is also a positive IM finding for the TCH with a population objective of 15,000-28,000 and a harvest objective of 900-2,800. There is a positive IM finding for the CAH with a population objective of 28,000-32,000 and a harvest objective of 1,400-1,600.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The season dates and bag limits would no longer be aligned within the range of the PCH. The season would be extended by 15 days and the bag limit would be reduced to 5 caribou in the remainder of Unit 24A.

**BACKGROUND:** In 2017 the board aligned the seasons and bag limits within the ranges of the PCH and CAH in Units 24A, 25A, 25D, 26B and 26C. Prior to 2017, seasons and bag limits in Unit 24A north of the south bank of the Kanuti River (24A remainder) reflected the WAH regulations (5 caribou/day), even though the WAH rarely ranges into Unit 24A.

The board's action in 2017 aligned seasons and bag limits in this portion of Unit 24A with other portions of the PCH range by increasing the resident season 15 days from 15 July–30 April to 1 July–30 April, and changing the resident bag limit from 5 caribou/day with no season bag limit to 10 caribou per season. Simplifying and aligning seasons and bag limits for the entire PCH range increased opportunity for resident hunters by extending seasons during late spring and summer and increased opportunity for nonresident hunters by increasing the bag limit in 24A remainder from 1 bull to 2 bulls.

#### *Porcupine Caribou Herd (PCH)*

Northern Unit 24A is occupied mostly by PCH caribou during late fall through early spring. Most caribou harvested in this area are PCH and harvest is relatively small. Hunters typically access caribou via the Dalton Highway in October and November and in March and April. The average annual reported harvest of caribou from 24A remainder during regulatory year 2016 (RY16; i.e., RY16 = July 1, 2016 through June 30, 2017) through RY18 was 3 caribou. In Unit 24A remainder, harvest is associated with the PCH. Based on recent distribution, seasons and bag limits should remain consistent throughout the PCH range to avoid confusion in regulation.

The PCH was estimated at 218,000 caribou in 2017 and is likely stable or increasing based on trends in abundance, low adult mortality, average pregnancy rates and early calf survival. Hunting pressure on the PCH is relatively low because the herd is frequently inaccessible to hunters. The combined annual harvest rate between Alaska and Canada was <3% of the population during RY12–RY13.

#### *Hodzana Hills caribou herd (HHH)*

The HHH also occupies a portion of Unit 24A from north of the Kanuti River to the South Fork of the Koyukuk River. The reported annual harvest of caribou from the HHH during RY09–RY18 was 0–3 caribou (average = 1.2).

Small herds such as the HHH are usually predator-limited and have low recruitment rates. Therefore, the harvestable surplus is estimated at a lower rate (i.e., 2–3% of the estimated population) which allows for a harvest of 14–30 caribou per year for the HHH.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal because it reduces opportunity unnecessarily. In addition, based on recent distribution, seasons and bag limits should remain consistent throughout the PCH range to avoid confusion in regulation.



The board may wish to consider address C&T uses for the HHH by either expanding current C&T findings for related herds to include HHH or by evaluating evidence for a new finding for HHH individually.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 67 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear and 5 AAC 92.132. Bag limit for brown bears.** Increase the resident bag limit for brown bears in Unit 21D.

**PROPOSED BY:** Middle Yukon Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to increase the resident bag limit of brown bears from 1 to 2 bears per regulatory year in Unit 21D.

**WHAT ARE THE CURRENT REGULATIONS?**

Brown bear regulations in Unit 21D are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.

<b>Open to</b>	<b>Bag limit &amp; Special Instructions</b>	<b>Open Season</b>
Both residents & nonresidents	<i>One bear</i> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill.</i></li> <li>• <i>Spring and fall baiting allowed.</i></li> </ul>	Aug 10-June 30
Residents	<b>One bear</b> by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> <li>• <i>Meat salvage REQUIRED for human consumption</i></li> <li>• <i>Permit must be obtained in advance</i></li> <li>• <i>Hide and skull salvage NOT required</i></li> <li>• <i>Sealing not required, unless removed from subsistence area or tanned.</i></li> <li>• <i>If sealed, the skin of the head &amp; front claws are removed &amp; kept by ADF&amp;G.</i></li> <li>• <i>No aircraft use allowed.</i></li> <li>• <i>Subject to Failure to Report penalties.</i></li> </ul>	Aug 10-June 30

There is a positive C&T finding for brown bears in Units 21 and 22 combined, and an ANS of 20–25 in Units 21 and 22 combined.

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

Harvest of brown bears at bear bait stations is allowed in Unit 21D with the following season dates:

- August 10–September 30;
- April 15–June 30.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The bag limit of brown bears would increase from 1 to 2 bears per regulatory year in Unit 21D. This proposal would likely result in an additional annual harvest of 0–6 brown bears, based on similar bag limits and harvest rates in other parts of Region III. Hunters would have additional opportunity to harvest brown bears and the bag limit would no longer be aligned with nearby Units 21B, 21C, and 24D, but would be aligned with 21E. Brown bears harvested in Unit 21D by residents would also be legal to be sold.

**BACKGROUND:** Additional brown bears could be sustainably harvested in Unit 21D, providing more opportunity for resident hunters.

Estimates of known bear densities in similar habitats in Interior Alaska are used to estimate a brown bear population of 350–400 in Units 21B, 21C and 21D, combined. The management objective for Units 21B, 21C and 21D, combined, is to manage a brown bear population that will sustain a 3-year mean harvest of at least 25 bears (50% males). Harvest was below this level during RY16–RY18, at 17 bears/year (63% males). Based on a conservative estimated sustainable harvest rate of 5–6%, the bear population in these units can sustain an annual harvest of at least 18–24 bears/year (50% males). Residents reported taking 38% of the harvest and nonresidents took 62%. In Unit 21D the average annual reported harvest during RY16–RY18 was 10 bears.

The 20-year harvest trend in the Galena Area (including Unit 21D) indicates that harvest remained stable even though bag limits, seasons, and methods were expanded during this time. Males were harvested at a higher rate than females. Average ages of harvested bears in the Galena Area remained stable, indicating that the population was not overexploited.

Two-bear bag limits and spring brown bear baiting are available to hunters in Units 19A, 19D and 20E. Unit 19D also has fall brown bear baiting, which has the broadest season and bag limit in Region III. The harvest data from these units were used to determine potential additional harvest if this proposal is adopted. The reported annual harvest since RY12 for those units indicates that most hunters do not take more than 1 bear per year. Three of 35 hunters in 19A, 0 of 24 hunters in 19D, and 6 of 109 hunters in 20E harvested 2 bears/year.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** expanded hunter opportunity, since there are no biological concerns. The department also urges the Board to consider expanding non-resident opportunity given the harvestable surplus.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 68 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**  
 Establish a fall bear baiting season in Unit 21C.

**PROPOSED BY:** Craig Hill

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to allow harvest of brown and black bears during August 1–September 30 at registered bear bait stations in Unit 21C. If adopted hunters would be able to take black bears at bait stations in Unit 21C from August 1 - September 30, and brown bears at bait stations from August 10 - September 30.

**WHAT ARE THE CURRENT REGULATIONS?**

Brown bear regulations in Unit 21C are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- There is a positive C&T finding for brown bears in Units 21 and 22 combined, with an ANS of 20-25 bears, combined.

Open to	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	<i>One bear</i> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill</i></li> <li>• <i>Spring baiting allowed April 15–June 30</i></li> </ul>	Aug 10–June 30

Black bear regulations in Unit 21C are as follows:

- *No resident locking-tag required.*
- *Sealing not required*
- *Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.*
- *Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.*
- *There is a positive C&T finding for black bears in Unit 21 with no established ANS.*

Open to	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	<i>Three bears</i> <ul style="list-style-type: none"> <li>• <i>Meat salvage required (January 1–May 31)</i></li> <li>• <i>Meat or hide (with claws attached) salvage required (June 1–December 31)</i></li> <li>• <i>No sealing requirement</i></li> <li>• <i>Spring baiting allowed April 15–June 30</i></li> </ul>	No closed season

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Harvest of brown and black bears at registered bear bait stations in Unit 21C would be allowed for an additional 61 days during the fall. This may result in increased harvest.

**BACKGROUND:** The board first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014, and Unit 21C in 2017. Since 2012, there has been an annual average of 26 black bear bait stations registered in these units. The reported annual harvest from Regulatory Year 2012 (RY12; i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18 for those units shows an average of fewer than 1 brown bear per year was harvested over bait. There is no sealing or harvest ticket requirement for black bears in Unit 21C, but with an annual average of 6 bait sites registered (RY12–RY18) the department believes black bear harvest is low.

The 20-year trend in the harvest data in the Galena Area (including Unit 21C) indicated that brown bear harvest was stable even though bag limits, seasons, and methods were broadened. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the Galena Area population was not over-exploited.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** aspects of this proposal to provide additional hunting opportunity, because it does not cause any biological concerns with brown or black bear harvest in Unit 21C. Based on harvest history the department does not anticipate additional brown and black bear harvest that might occur at bait sites in Unit 21C to increase to unsustainable levels.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 69 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**  
Establish a fall bear baiting season in Unit 21C.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to allow harvest of brown and black bears during August 1–September 30 at registered bear bait stations in Unit 21C. If

adopted hunters would be able to take black bears at bait stations in Unit 21C from August 1 - September 30, and brown bears at bait stations from August 10 - September 30.

**WHAT ARE THE CURRENT REGULATIONS?**

Brown bear regulations in Unit 21C are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- There is a positive C&T finding for brown bears in Units 21 and 22 combined, and an ANS of 20–25 bears combined.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21C	<i>One bear</i> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill</i></li> <li>• <i>Spring baiting allowed April 15–June 30</i></li> </ul>	Aug 10–June 30

Black bear regulations in Unit 21C and adjacent areas are as follows:

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21C, 24	<i>Three bears</i> <ul style="list-style-type: none"> <li>• <i>Meat salvage required (January 1– May 31)</i></li> <li>• <i>Meat or hide (with claws attached) salvage required (June 1– December 31)</i></li> <li>• <i>No sealing requirement</i></li> <li>• <i>Spring baiting allowed April 15–June 30</i></li> <li>• <i>There are positive C&amp;T findings for black bears in Unit 21 and in Unit 24 but no established ANS in either unit.</i></li> </ul>	No closed season

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Harvest of brown and black bears at registered bear bait stations in Unit 21C would be allowed for an additional 61 days during the fall, which may result in increased harvest.

**BACKGROUND:** The board first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014, and Unit 21C in 2017. Since 2012, there has been

an annual average of 26 black bear bait stations registered in these units combined. The reported annual harvest from Regulatory Year 2012 (RY12; i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18 for those units shows an average of fewer than 1 brown bear per RY was harvested over bait. There is no sealing or harvest ticket requirement for black bears in unit 21C, but with an annual average of 6 black bear sites registered (RY12–RY18) the department believes harvest is low.

The 20-year trend in the harvest data indicated that brown bear harvest in the Galena Area (including Unit 21C) was stable even though bag limits, seasons, and methods were broadened. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the population in the Galena Area was not over-exploited.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** aspects of this proposal to provide additional hunting opportunity, since it does not cause any biological concerns with brown or black bear harvest in Unit 21C. Based on this harvest history we anticipate that any additional brown and black bear harvest that might occur at bait sites in Unit 21C will not increase harvest to unsustainable levels.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 70 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Extend the season dates for brown bears in Unit 24A.

**PROPOSED BY:** Jonah Stewart, Rudy Martinez and Nicholas Muche

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to extend the season date for brown bears in Unit 24A from August 10–June 30 to July 25–June 30.

**WHAT ARE THE CURRENT REGULATIONS?**

**Dalton Highway Corridor Management Area:** Units 20, 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area. The area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the DHCMA is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only. Small game may also be taken by falconry. Aircraft and boats may be used to transport hunters, their gear, or parts of game within the DHCMA. A snowmachine may be used to transport hunters, their hunting gear, or parts of game across the management area from land outside the management area to access land on the other side of the management area. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game, within the DHCMA, EXCEPT licensed highway vehicles may be used on the following designated roads: 1) Dalton Highway; 2) Bettles Winter Trail during periods when BLM and the City of Bettles announce that the trail is open to winter travel; 3) Galbraith Lake road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open; 4) Toolik Lake Road, excluding the driveway to the Toolik

Lake Research Facility; 5) The Sagavanirktok River access road two miles north of Pump Station 2; 6) any constructed roadway or gravel pit within 1/4 mile of the Dalton Highway. Any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the DHCMA.

Brown bear regulations in Unit 24A and adjacent areas are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Nonresident hunters must be accompanied by a guide or resident relative within second-degree kindred age 19 or older who possesses a valid Alaska hunting license.
- There is a positive C&T finding for brown bears in Units 23, 24, and 26 combined, with an ANS of 25–35 bears combined.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	24A, 24B	One bear <ul style="list-style-type: none"> <li>• Hide and skull salvage required</li> <li>• Sealing required within 30 days of kill</li> </ul>	Aug 10–June 30
Residents Only	24	One bear by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> <li>• Meat salvage REQUIRED for human consumption</li> <li>• Permit must be obtained in advance</li> <li>• Hide and skull salvage NOT required</li> <li>• Sealing not required, unless removed from subsistence area or tanned.</li> <li>• If sealed, the skin of the head &amp; front claws are removed &amp; kept by ADF&amp;G.</li> <li>• No aircraft use allowed.</li> <li>• Subject to Failure to Report penalties.</li> </ul>	Aug 10–June 30
Both residents & nonresidents	25A	One bear <ul style="list-style-type: none"> <li>• Hide and skull salvage required</li> <li>• Sealing required within 30 days of kill</li> <li>• Spring baiting allowed April 15–June 30</li> <li>• Same day airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane</li> </ul>	July 25–June 30

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would extend the brown bear season in Unit 24A by adding 17 days of additional

harvest opportunity. This proposal would align season dates with Unit 25A (adjacent unit to the east) but would misalign season dates with Unit 24B (adjacent unit to the west). Sheep hunters would benefit by being able to hunt brown bears prior to the start of sheep season, which is August 10. If adopted, the regular season, which is open to residents and nonresidents, would begin 17 days before the resident RB601 hunt season.

**BACKGROUND** Additional brown bear harvest opportunity is sustainable in Unit 24A, however, Unit 24A is easily accessed by the Dalton Highway and has the highest reported brown bear harvest for all of Unit 24. The average reported annual harvest of brown bears in Unit 24A during Regulatory Year 2012 (RY12, i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18, was 11 bears. For all of Unit 24, the average reported annual harvest was 17 bears. Based on the estimated sustainable harvest rate of 5–6% in Unit 24, a minimum annual harvest of 39–56 bears can be sustained for all of Unit 24. The department estimated a population of 450 bears in northern Unit 24 (north of Allakaket) and 320–480 in the remainder of the unit (south of Allakaket), based on extrapolated densities of similar habitats from other surveys.

The 20-year trend in the harvest data indicated that harvest in the Galena Area (including Unit 24A) was stable even though bag limits, seasons, and methods were liberalized. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the population in the Galena Area was not overexploited.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** expanded seasons, since additional harvest opportunity exists. The department has no biological concerns with current brown bear harvest in Unit 24A. However, due to the accessibility of the unit, the board may wish to be cautious regarding expanding season dates into July and may wish to consider season dates of August 1–June 30. This would provide 10 additional days of brown bear hunting which will provide an increase in opportunity with reduced concerns about overharvest.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 71 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**  
Establish a brown bear baiting season in Unit 24A.

**PROPOSED BY:** Adam Owen

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to allow the take of brown bears at registered black bear bait stations in Unit 24A.

**WHAT ARE THE CURRENT REGULATIONS?**

**Dalton Highway Corridor Management Area:** Units 20, 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the driveable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area. The area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the DHCMA is closed to hunting; however, big game, small game, and fur animals may be taken in



the area by bow and arrow only. Small game may also be taken by falconry. Aircraft and boats may be used to transport hunters, their gear, or parts of game within the DHCMA. A snowmachine may be used to transport hunters, their hunting gear, or parts of game across the management area from land outside the management area to access land on the other side of the management area. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game, within the DHCMA, EXCEPT licensed highway vehicles may be used on the following designated roads: 1) Dalton Highway; 2) Bettles Winter Trail during periods when BLM and the City of Bettles announce that the trail is open to winter travel; 3) Galbraith Lake road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open; 4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility; 5) The Sagavanirktok River access road two miles north of Pump Station 2; 6) any constructed roadway or gravel pit within 1/4 mile of the Dalton Highway. Any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the DHCMA.

Brown bear regulations in Unit 24A and adjacent areas are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Nonresident hunters must be accompanied by a guide or resident relative within second-degree kindred age 19 or older who possesses a valid Alaska hunting license.
- There is a positive C&T finding for brown bears in Units 23, 24, and 26 combined, and an ANS of 25–35 bears in Units 23, 24 and 26 combined. Units 21 and 22 combined have a positive C&T finding for brown bears, with a combined ANS of 20-25. Unit 25 has a negative C&T finding for brown bears.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	24A, 24B	One bear <ul style="list-style-type: none"> <li>• Hide and skull salvage required</li> <li>• Sealing required within 30 days of kill</li> </ul>	Aug 10–June 30
Both residents & nonresidents	21C, 25A	One bear <ul style="list-style-type: none"> <li>• Hide and skull salvage required</li> <li>• Sealing required within 30 days of kill</li> <li>• Spring baiting allowed April 15–June 30</li> <li>• Same-day-airborne hunting at bait stations is permitted, if hunter is at least 300 feet from the airplane</li> </ul>	Aug 10–June 30

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21D, 24C, 24D	One bear <ul style="list-style-type: none"> <li>• Hide and skull salvage required</li> <li>• Sealing required within 30 days of kill</li> <li>• Spring <u>and fall</u> baiting allowed (August 1–September 30 and April 15–June 30)</li> <li>• Same day airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane</li> </ul>	Aug 10–June 30

Black bear regulations in Unit 24A and adjacent areas are as follows:

- No resident locking-tag required.
- Sealing not required
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- There are positive C&T findings for black bears in Unit 21 and in Unit 24 with no established ANS for either unit.

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21C, 24	Three bears <ul style="list-style-type: none"> <li>• Meat salvage required (January 1– May 31)</li> <li>• Meat or hide (with claws attached) salvage required (June 1– December 31)</li> <li>• No sealing requirement</li> <li>• Spring baiting allowed April 15–June 30</li> </ul>	No closed season

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Both residents & nonresidents	21D, 24C, and 24D	Three bears <ul style="list-style-type: none"> <li>• Meat salvage required (January 1– May 31)</li> <li>• Meat or hide (with claws attached) salvage required (June 1– December 31)</li> <li>• No sealing requirement</li> <li>• Spring and fall baiting allowed (August 1– September 30 and April 15–June 30)</li> </ul>	No closed season

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Harvest of brown bears at registered bear bait stations in Unit 24A would be allowed during the spring black bear baiting season. This may result in minimal increased harvest.

**BACKGROUND:** The board first approved harvest of brown bears at black bear bait stations in Unit 21D in 2012, Units 24C and 24D in 2014, and Unit 21C in 2017. Since 2012, there has been an annual average of 26 black bear bait stations registered in these units combined. The reported annual harvest from Regulatory Year 2012 (RY12; i.e., RY12 = July 1, 2012 through June 30, 2013) through RY18 for those units shows an average of fewer than 1 brown bear per year was harvested over bait. In all of Unit 24 during that time, the average annual reported harvest was 17 brown bears/year. Based on our estimated minimum sustainable harvest rate of 5–6% in Unit 24, a minimum annual harvest of 39–56 bears can be sustained for all of Unit 24.

Unit 24A is accessible by the Dalton Highway and 33% of the unit (1,395.42 mi<sup>2</sup>) is within the DHCMA. There are no sealing or harvest ticket requirements for black bears in Unit 24A, but with an annual average of 4 black bear bait sites registered (RY12–RY18) harvest is expected to be low.

The 20-year trend in the harvest data indicated that brown bear harvest in the Galena Area (including Unit 24A) was stable even though bag limits, seasons, and methods were broadened. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable, indicating that the population in the Galena Area was not overexploited. The department estimates a population of 450 bears in northern Unit 24 (north of Allakaket) and 320–480 in the remainder of the unit (south of Allakaket), based on extrapolated densities of similar habitats from other surveys.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** aspects of this proposal to provide additional hunting opportunity, since it does not cause any biological concerns with brown bear harvest in Unit 24A. Based on this harvest history the department anticipates that any additional brown harvest that might occur at bait sites in Unit 24A will not increase harvest to unsustainable levels.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 72 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Increase the bag limit for brown bears in Unit 24B.

**PROPOSED BY:** Gates of the Arctic Subsistence Resource Commission

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to increase the resident bag limit for brown bears from 1 to 2 bears per regulatory year in Unit 24B.

**WHAT ARE THE CURRENT REGULATIONS?**

Brown bear regulations in Unit 24B and adjacent areas are as follows:

- *No resident locking-tag required.*
- *Evidence of sex must remain naturally attached to the hide.*
- *Harvest of cubs or females accompanied by cubs is not allowed*
- *Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.*

Open to	Unit/ Area	Bag limit & Special Instructions	Open Season
Residents	21D, 24A, 24B, 24C, 24D	<b>One bear</b> by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> <li>• <i>Meat salvage REQUIRED for human consumption</i></li> <li>• <i>Permit must be obtained in advance</i></li> <li>• <i>Hide and skull salvage NOT required</i></li> <li>• <i>Sealing not required, unless removed from subsistence area or tanned.</i></li> <li>• <i>If sealed, the skin of the head &amp; front claws are removed &amp; kept by ADF&amp;G.</i></li> <li>• <i>No aircraft use allowed.</i></li> <li>• <i>Subject to Failure to Report penalties.</i></li> </ul>	Aug 10-June 30
Both residents & nonresidents	24A, 24B	<b>One bear</b> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill.</i></li> </ul>	Aug 10-June 30

There is a positive customary and traditional use finding for brown bears in Unit 24; the board found that 25–35 animals are reasonably necessary for subsistence in Units 23, 24 and 26 combined.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Hunters would have additional opportunity to harvest brown bears and harvest may increase. This proposal could result in an additional annual harvest of 0–6 brown bears, based on similar bag limits and harvest rates in other parts of Region III; however, the 20-year harvest trend indicates

that harvest remained stable even though bag limits, seasons, and methods were expanded during this time. Brown bears harvested in Unit 24B would also be legal to be sold.

**BACKGROUND:** Additional brown bears could be sustainably harvested in Unit 24B, providing more opportunity for hunters.

The management objective for Unit 24 is to manage a brown bear population that will sustain a 3-year mean reported harvest of at least 20 bears in the northern portion of the unit (north of Allakaket) and at least 15 bears in the southern (remaining portion) part of the unit, with at least 50% males reported in the harvest. The average reported harvest for the northern portion of the unit during RY16–RY18 was 14 bears (64% male) and for the remainder of the unit, the reported harvest was 1 bear (100% male). Residents reported 51% of the harvest during these years and non-residents reported 49%. In Unit 24B the average annual reported harvest from RY16–RY18 was 3.7 bears.

The 20-year trend in the harvest data indicated that harvest in the Galena Area (including Unit 24B) was stable even though bag limits, seasons and methods were liberalized. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable indicating that the population in the Galena Area was not over exploited.

Two-bear bag limits occur in Units 19A, 19D and 20E. Unit 19D also has fall brown bear baiting in addition to a spring brown bear baiting and a 2-bear bag limit, which is the most liberal season and bag limit in Region III. The harvest data from these units were used to determine potential additional harvest if this proposal is adopted. The reported annual harvest since RY12 for those units show that most hunters do not take more than 1 bear per year. Three of 35 hunters in 19A, 0 of 24 hunters in 19D (which is not connected by road to large population centers) and 6 of 109 hunters in 20E (where road and trail access are good) harvested 2 bears/year.

The department estimated a population of 450 bears in northern Unit 24 (north of Allakaket) and 320–480 in the remainder of the unit (south of Allakaket), based on extrapolated densities of similar habitats from other surveys. Based on the estimated sustainable harvest rate of 5–6% in Unit 24, a minimum annual harvest of 39–56 bears can be sustained for all of Unit 24. Based on this harvest history, harvest is not anticipated to increase to unsustainable levels.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on allocative aspects of this proposal but **SUPPORTS** expanded hunter opportunity as there are no biological concerns.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL73– 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Eliminate the RB601 subsistence brown bear permit for Units 21D, 24A, 24B, 24C, 24D.

**PROPOSED BY:** Jack Reakoff

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to eliminate the RB601 subsistence brown bear permit.

**WHAT ARE THE CURRENT REGULATIONS?**

Brown bear regulations in Units 21D, 24A, 24B, 24C, 24D are as follows:

- No resident locking-tag required.
- Evidence of sex must remain naturally attached to the hide.
- Harvest of cubs or females accompanied by cubs is not allowed
- Bears killed in defense of life or property must be skinned and the hide (with claws and evidence of sex attached) and skull turned over to ADF&G.

<b>Open to</b>	<b>Unit/ Area</b>	<b>Bag limit &amp; Special Instructions</b>	<b>Open Season</b>
Both residents & nonresidents	21D	<b>One bear</b> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill.</i></li> <li>• <i>Spring and fall baiting allowed.</i></li> </ul>	Aug 10-June 30
Residents	21D, 24A, 24B, 24C, 24D	<b>One bear</b> by RB601 permit available at ADF&G offices beginning July 11. <ul style="list-style-type: none"> <li>• <i>Meat salvage REQUIRED for human consumption</i></li> <li>• <i>Permit must be obtained in advance</i></li> <li>• <i>Hide and skull salvage NOT required</i></li> <li>• <i>Sealing not required, unless removed from subsistence area or tanned.</i></li> <li>• <i>If sealed, the skin of the head &amp; front claws are removed &amp; kept by ADF&amp;G.</i></li> <li>• <i>No aircraft use allowed.</i></li> <li>• <i>Subject to Failure to Report penalties.</i></li> </ul>	Aug 10-June 30
Both residents & nonresidents	24A, 24B	<b>One bear</b> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill.</i></li> </ul>	Aug 10-June 30
Both residents & nonresidents	24C, 24D	<b>One bear</b> <ul style="list-style-type: none"> <li>• <i>Hide and skull salvage required</i></li> <li>• <i>Sealing required within 30 days of kill.</i></li> <li>• <i>Spring and fall baiting allowed.</i></li> </ul>	Aug 10-June 30

...

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

The board has made a positive C&T finding for brown bears in Units 21 and 23 combined, with a combined ANS of 20–25 bears. The board has also made a positive C&T finding for brown bears in Units 23, 24, and 26 combined, with a combined ANS of 25–35.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The RB601 subsistence permit in Units 21D and 24 would be eliminated and would remain in Units 19A and 19B. The Unit 21D and 24 regulations would no longer reflect customary and traditional uses previously recognized by the board. Brown bear hunters previously participating under RB601 will have to have their bear sealed, even if it does not leave the unit or is not commercially tanned, which may come at a cost to private parties to participate in this hunt. Hunters previously participating would also have to salvage the skull, which may be contrary to customary and traditional uses. Allowing aircraft transport may increase hunter effort by an unknown amount.

**BACKGROUND:** The RB601 subsistence brown bear permit is no longer utilized by residents of Units 21D and 24, and some hunters have expressed confusion by the regulation. The elimination of this permit would not affect season dates. In accordance with customary and traditional uses, subsistence hunters are required to salvage the meat; meat cannot be used for trapping bait; no tag is required (both subsistence and general season hunts); and salvage of the hide or skull is not required. If the hide is salvaged and removed from the unit or commercially tanned it must be sealed, and at that time the skin of the head and front claws will be removed and kept by the department. The use of aircraft is prohibited for subsistence hunts. Under the other brown bear hunt, the hunter can choose whether they want to salvage the meat and the hunter does not have to obtain the permit in advance. The Department has provided broad flexibility for sealing hides for all hunters in order to accommodate limited access to sealers in rural communities. In order to make sure bear sealing was convenient, the Galena area biologist has traveled to remote villages, had hides shipped to him (freight collect), had local sealers do the sealing, or sent temporary sealing forms to the hunter.

<b>Brown Bear Regulation</b>	<b>Required for Other Brown Bear Hunts</b>	<b>Required for RB601</b>
Sealing	Yes	No (unless hide and/or skull are taken from the unit or commercially tanned)
Hide salvage	Yes	No (unless sealed)
Skull salvage	Yes	No (unless sealed)
Meat salvage	No (unless baited)	Yes
Permit	No	Yes
Tag fee	No	No
Trophy destruction	No	Yes (if hide and/or skull are taken from the unit or commercially tanned)
Aircraft transport allowed	Yes	No
Season	Aug 10–June 30	Aug 10–June 30
Bag limit	1 bear per regulatory year	1 bear per regulatory year

The RB601 subsistence brown bear permit is seldom utilized. Only 1 bear was harvested during RY09–RY18 on the RB601 by local residents in Units 21D and 24, and only 5 bears have been

harvested on RB601 in those units since its implementation in 2004. Twenty-six bears were harvested under the other hunt by local residents during RY09–RY18. Although 97 RB601 permits were issued during this time, hunters who checked in at the Koyukuk check station often said they misunderstood the requirements of the RB601 regulations as the reason they obtained the permit and they intended to hunt under the other harvest regulations once they understood the conditions of the RB601 permit.

Subsistence implications from the Alaska Supreme Court’s *Morry* case (1992) invalidated 5 AAC 92.012(c) (brown bear tag fee requirement) and 5 AAC 92.165 (bear sealing requirement) as subsistence regulations and resulted in the brown bear tag fee exemption and sealing exemption. In *Morry*, the plaintiff objected to (among other things) the tag and sealing requirement as applied to subsistence hunting for brown bears. The court agreed that the regulation was invalid for subsistence hunts because a) leaving the meat at the kill site is not a subsistence use; it recognized a distinction between subsistence uses and trophy harvest of brown bears, and b) there had been no regulatory process in accordance with the Administrative Procedure Act where a public hearing addressed subsistence uses under the 1986 subsistence law. Based on *Morry* (1992), sealing, salvaging meat, and salvaging hides are customary and traditional use distinctions that should be addressed in any proposal and in the public hearing that would be held when considering adoption of a change in regulation.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this issue. The department has no biological concerns with brown bear harvest in Units 21D, 24A, 24B, 24C and 24D. If adopted, the board should determine if the new regulations will continue to provide a reasonable opportunity for success in harvesting and using brown bears for subsistence uses.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 74 –5 AAC 85.050. Hunting seasons and bag limits for muskox.** Establish a limited quota muskoxen season in Units 21D and 24D.

**PROPOSED BY:** Middle Yukon Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would establish a muskox hunt in Units 21D and 24D (Nulato Hills) for up to 5 bulls during February 1–April 30, in combination with Unit 22A (Proposal 31 in the Region V meeting).

**WHAT ARE THE CURRENT REGULATIONS?** There is no open hunting season for muskox in Units 21D or 24D.

There is a positive C&T finding for muskoxen in Unit 22 and Unit 23 combined, south and west of the Kobuk River drainage, with an ANS of 100–150, including 10–25 in Unit 22E. C&T findings have not been made for muskoxen in Units 21D and 24D.



**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would provide additional muskox harvest opportunity, depending on the available harvestable surplus.

**BACKGROUND:** This proposal is also scheduled for the Region V meeting as Proposal 31 to address the Unit 22A portion of this muskox population.

The Seward Peninsula muskox population was reintroduced in 1970. Muskoxen were transplanted to the western Seward Peninsula in 1970, and then again in 1981. The Seward Peninsula population grew 12% annually between 1970 and 2007; from 2007 to 2010 growth slowed to a 3% annual increase. The population peaked in 2010 at an estimated 2,903 muskoxen (95% CI: 2,690 to 3,271) but then declined 12% annually from 2010 to 2012 following several years of high adult female mortality and low recruitment. An abundance survey completed in 2017 estimated 2,353 muskoxen (95% CI: 1,908 to 2,936) indicating the population likely stabilized from 2015 to 2017. Concurrent with the population changes described above, the population slowly expanded its range eastward. Muskoxen within Units 21D and Unit 24D occupy an area of contiguous habitat that spans shared administrative boundaries with Unit 22 and Unit 23 and are believed to have emigrated to this area from the Seward Peninsula muskox population. Population survey results also indicate a shift in the distribution of groups within their range. Changes in the distribution of groups occurred gradually beginning in 2005, while the establishment of mixed-sex groups in the easternmost portions of their current range resulted from eastward range expansion across the Seward Peninsula that has occurred continuously since the reintroduction of muskoxen to the Seward Peninsula. Population survey areas were adapted through time to best document and monitor these changes.

Muskox hunting on the Seward Peninsula began in 1995 and was guided by the Seward Peninsula Cooperative Muskox Management Plan and the Muskox Cooperators Group. This group was instrumental in developing recommendations for consideration by the Board of Game as well as guidelines the department still uses to administer muskoxen hunts on the Seward Peninsula cooperatively with federal hunt administrators. Although 57% of Unit 22 is state land, there is a patchwork of federal land, and federal hunts are cooperatively administered along with state hunts. Objectives of the Seward Peninsula Cooperative Muskox Management Plan include providing for multiple uses of muskoxen and for harvest opportunity in a manner that allows for continued range expansion and growth of the population. Following range expansion of mixed-sex groups into the Nulato Hills, and documented long term use of the area, local Unit 22A residents and representatives of the Southern Norton Sound Fish and Game Advisory Committee discussed plans to initiate a muskox hunt in Unit 22A. Through these discussions, an abundance of 200-250 muskoxen was determined to be a biologically acceptable objective that should be achieved prior to the initiation of hunting in this expanded portion of the population's range.

A population survey completed in 2017 estimated 473 muskox (95% CI: 314 to 688) in the Nulato Hills. Composition surveys completed in the same area estimated mature bull: cow ratios between 48-69 mature bulls:100 cows in 4 surveys completed from 2012 through 2019. Estimates of recruitment from 2012 through 2019 averaged 14.5%.

The department estimates the harvestable surplus in the proposed hunt area is 9 bull muskoxen.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** with regards to this proposal, because it does not create or address a conservation concern.

Muskoxen in Units 21D and 24 emigrated to this area from the Seward Peninsula muskox population. Currently there is no C&T finding for muskox in Units 21 and 24. The board may wish to consider expanding the existing C&T finding for Seward Peninsula muskox to Units 21D and 24D. Addressing the C&T finding will also help guide what type of hunt to hold in the area (registration, drawing, Tier II, etc.) This action would be allocative; therefore, the department is neutral.

**COST ANALYSIS:** Approval of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 75–5 AAC 92.XXX.** Establish a predation control plan in Units 21D and 24.

**PROPOSED BY:** Darrell Vent, Sr.

**WHAT WOULD THE PROPOSAL DO?** If the proposal is adopted and the department were directed to do so by the board, the department would conduct a feasibility assessment of the potential effectiveness of implementing a predation control program for wolves and bears in Units 21D and 24 to assess the feasibility of implementing predation control due to land status, social factors, economic factors, and expectations for providing improved moose hunting opportunity in this area. This assessment would be presented to the board at the next Interior and Eastern Arctic Region board meeting in 2022/2023.

**WHAT ARE THE CURRENT REGULATIONS?**

There are no existing predation control plans in these units.

**Intensive Management:**

- These units all have positive IM findings for moose, as follows:

	<b>Population</b>	<b>Harvest</b>
	<b>Objective</b>	<b>Objective</b>
21D	7,000–10,000	450–1,000
24A	1,200–1,500	75–125
24B	4,000–4,500	150–250
24C	1,000–1,500	50–125
24D	5,000–6,000	225–425

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The department would collect the necessary data and complete a feasibility assessment to determine whether a predation control program to increase the moose population is feasible in this area at this time.

**BACKGROUND:** The proponent identifies several issues: 1) concern about high numbers of wolf and bears in Units 21D and 24; 2) concern about the ability of local subsistence users to meet their needs for moose; 3) a desire for broader regulations for wolves and bears; 4) a desire for the department to complete a feasibility assessment; and 5) concern of public safety related to predators.

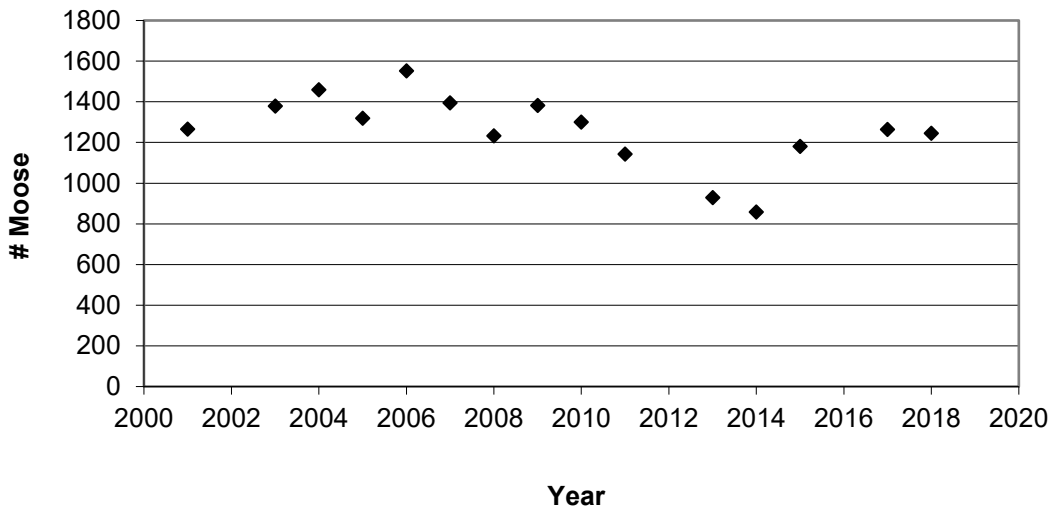
Units 21D and 24 include 38,164 mi<sup>2</sup> and approximately 65% of the area is federal land. In the area near Huslia, those federal lands are primarily the Koyukuk National Wildlife refuge lands, which are managed by the U.S. Fish and Wildlife Service (USFWS). Predation control has not been allowed on USFWS lands.

Moose densities vary throughout Units 21D and 24, with the highest density of 5–6 moose/mi<sup>2</sup> in the lower Koyukuk portion of 21D and the lowest density of 0.25 moose/mi<sup>2</sup> in the Brooks Range portion of Unit 24. Wolf survey data are limited to small portions of this area and bear surveys are not conducted.

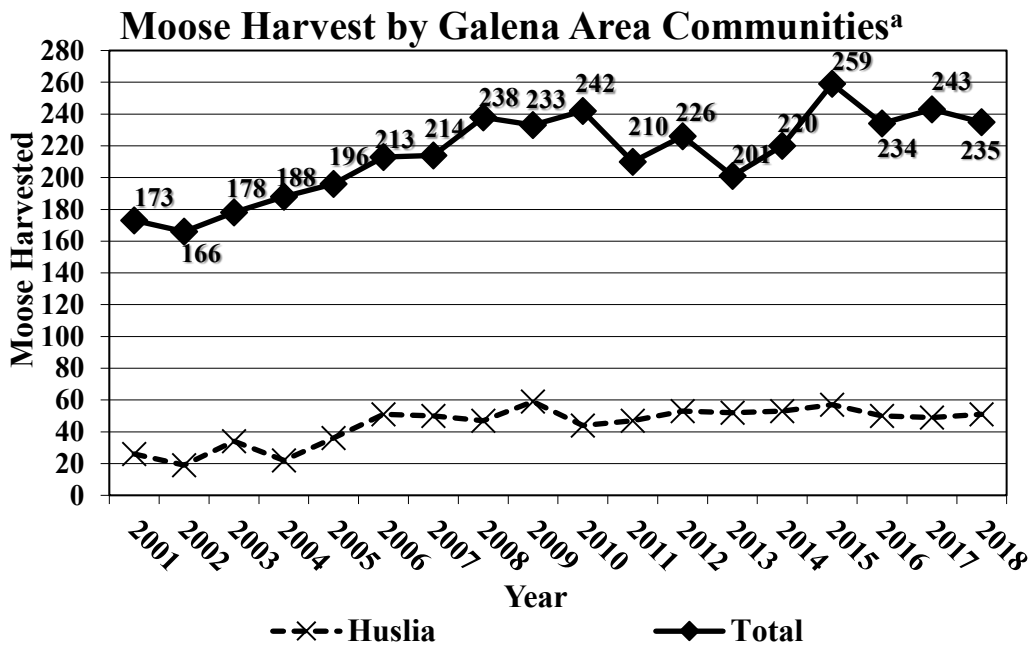
Although moose in the lower Koyukuk River drainage portion of Unit 21D declined during the early 2000s, moose in the Kaiyuh Flats portion of 21D increased, therefore the overall population in 21D was stable. Most of Unit 24 has moose densities of 0.25–0.50 moose/mi<sup>2</sup> and has remained stable within that range. However, moose trend count surveys in Unit 24D indicated fewer total moose than average from 2011 through 2018, due to poor calf recruitment (Figure 75.1). Trend count survey results corroborated concerns by residents of Huslia for Unit 24D.

Harvest by Galena area residents, including harvest in Units 21D and 24, has been stable since 2008 (Figure 75.2). Harvest of moose by local and Huslia residents was also stable during that period. Estimated moose populations and estimated harvest for Unit 21D and 24 are in Table 75.1.

**Huslia Flats and Treat Island Trend Count Areas  
(Average = 1,261)**



**Figure 75.1. Total moose counted for the combined Huslia Flats and Treat Island Trend Count Areas, Regulatory Years 2001 to 2018. A regulatory year is 1 July through 30 June (e.g., RY 2001 is 1 July 2001 through 30 June 2001).**



**Figure 75.2. Moose harvest by Galena area communities in Units 21B, 21C, 21D, and 24, Regulatory Years<sup>b</sup> 2001 to 2018.**

<sup>a</sup>Includes the communities of Tanana, Ruby, Galena, Koyukuk, Nulato, Kaltag, Huslia Hughes, Allakaket, Alatna, Bettles, Evansville, Coldfoot, and Wiseman.

<sup>b</sup>Regulatory year is 1 July through 30 June (e.g., RY 2001 is 1 July 2001 through 30 June 2001)

**Table 75.1. Units 21D and 24 Intensive Management population and harvest objectives (5 AAC 92.108), and current estimated moose population and harvest.**

Unit	Moose			
	IM Population objective	Population estimate	IM Harvest objective	Harvest estimate <sup>a</sup>
21D	7,000–10,000	10,478 ( $\pm 1,572$ )	450–1,000	412
24A	1,200–1,500	3,991 ( $\pm 1,101$ ) <sup>b</sup>	75–125	36
24B	4,000–4,500		150–250	65
24C	1,000–1,500	562 ( $\pm 130$ )	50–125	37
24D	5,000–6,000	4,380 ( $\pm 477$ )	225–425	179

<sup>a</sup>Harvest estimate derived from 10-year average reported harvest and estimated unreported harvest.

<sup>b</sup>Units 24A and 24B combined.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because there are no conservation concerns regarding these populations. The proposal describes a large area with varying predator and prey populations, and portions of Unit 24 have current IM plans. The proposal identifies public safety as a component of the IM program request. The department prepares for and conducts IM activities based on ungulate populations that have been found to have high levels of harvest for human consumptive use rather than human/wildlife conflicts.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 76 – 5 AAC 92.126. Non-Intensive Management Predator Control Plans.**

Establish a predation control plan for caribou in a portion of Units 21B, 21C and 21D to benefit the Galena Mountain caribou herd (GMH) and Wolf Mountain caribou herd (WMH).

**PROPOSED BY:** Craig Hill.

**WHAT WOULD THE PROPOSAL DO?** A predation control plan would establish objectives for population recovery of the GMH and WMH caribou herds and establish objectives for wolf, black bear, and grizzly bear population abundance in the range of these caribou herds. The program could consider habitat enhancement alternatives to improve transitional habitat and visual security for cows traveling between calving areas and their summer range.

**WHAT ARE THE CURRENT REGULATIONS?**

There are no existing predation control plans to benefit caribou in these units.

The GMH and WMH caribou have negative Intensive Management (IM) findings as identified big game prey populations important for providing high levels of human consumptive use. Therefore, these herds do not have IM population and harvest objectives.

The board has made a positive C&T finding for the Galena Mountains and Wolf Mountain caribou herds combined (along with the Ray Mountains herd), and ANS of 150–200 animals for all three herds combined.

The current seasons and bag limits are the following.

5 AAC 85.025	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<b>Units and Bag Limits</b>		
(a)		
...		
(16)		
...		
Unit 21B, that portion north of the Yukon River and downstream from Ukawutni Creek	No open season.	No open season.
Remainder of Unit 21B 1 caribou	Aug. 10–Sept. 30	Aug. 10–Sept. 30
Unit 21C, that portion within the Dulbi River drainage and that portion within the Melozitna River Drainage downstream from Big Creek	No open season.	No open season.
Remainder of Unit 21C 1 caribou	Aug. 10–Sept. 30	Aug. 10–Sept. 30
Unit 21D, that portion north of the Yukon River and east of the Koyukuk River	(Winter season to be announced)	No open season.
2 caribou;		
Remainder of Unit 21D		

RESIDENT HUNTERS:

5 caribou per day; as follows:

up to 5 bulls per day; however,  
calves may not be taken

July 1–Oct. 14  
Feb. 1–June 30

up to 5 cows per day; however,  
calves may not be taken

Sept. 1–Mar. 31

NONRESIDENT HUNTERS:

1 bull; however, calves may not  
be taken

Aug. 1–Sept. 30

...

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If the proposal is adopted and the department were directed to do so by the board, a feasibility assessment of the potential effectiveness of predation control in this area would be initiated. This assessment would include identifying data gaps in the biological understanding of caribou, habitat, and predation in these herds. The department would develop predation control program objectives for caribou, black bear, grizzly bear, and wolf abundance. The department would assess potential response to predation control and the limiting factors of the GMH. This assessment would include habitat factors that may limit the caribou populations, including actions that may improve visual security for escape from predators when caribou transition through valleys separating calving and summer habitats. The department would assess feasibility of implementation due to land status, social factors, economic factors, and expectations for providing improved hunting opportunity for caribou in this area. The department would develop an experimental protocol to assess the response to management activities implemented. The department would develop a budget for completing the program and then assess funding priorities. If feasible and approved by the board, the department would implement a predation control or habitat improvement program when funded.

**BACKGROUND:** This proposal addresses the conservation concern regarding population sustainability of the GMH, and, to a lesser extent, the sustainability of the WMH. Although calf production in both herds can be high, calf survival is low and population counts have declined. Encroachment of trees and shrubs on the caribou range is a concern because they provide good cover for bears to prey on caribou that must transition through this habitat with their young calves to reach summer range.

Alaska's Constitution requires the department to manage populations on a sustainable basis. The board has identified the GMH and WMH as distinct populations in 5 AAC 92.108 and 5 AAC 99.025. Because the GMH and WMH are not important for providing high levels of harvest for human consumptive uses (5 AAC 92.108), an intensive management plan cannot be considered. However, the proponent is asking for a non-intensive management plan to address this conservation concern, similar to that described in 5 AAC 92.126.

Ridgeline travel corridors once dominated by open alpine tundra are now forested with high shrubs, birch, and spruce. This may affect the ability of caribou to see and avoid predators in this

narrow transitional zone. Pregnant cows from the GMH cross the Melozitna River near Galena Mountain to calve in the Kokrines Hills to the east on talus slopes and open ridges above the tree-line. Cows and calves returning west to the summer range transition through the Melozitna River riparian zone and forested uplands. Black and grizzly bears appear to focus on caribou in this zone during spring.

Minimum counts have been conducted for the GMH caribou since 1982. Beginning in the early 1990s, radiocollars were used to locate the herd and improve survey efficiency and population estimation. In the 1990s and early 2000s minimum counts were as high as 313 caribou during post-calving aggregation surveys. Large numbers of mature bulls were not typically in these groups and small groups were likely missed; therefore, the herd was estimated at 300–500 caribou. Minimum counts conducted since 2002 have remained below 150 animals, except in 2012 when 162 caribou were counted (including a high number of calves); therefore, the abundance is currently estimated at fewer than 150 caribou.

The estimated population size of the GMH has been fewer than 150 caribou since 1999 but the range historically supported more than 350 caribou. Due to low abundance, the hunting season for the GMH has been closed since regulatory year 2004 (RY04; i.e., RY04 = July 1, 2004 through June 30, 2005), with no reported harvest. The estimated population size for the WMH is 450–650 caribou. A somewhat higher count (684) of the WMH in 2019 included large numbers of calves, but calf survival in 2019 remains to be quantified. Hunting is open in the WMH range due to this higher, relatively stable population. Reported harvest in the WMH has averaged 1.4 caribou/year since RY09.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because of the negative Intensive Management finding for these herds. Should the board adopt this proposal, the department will conduct a feasibility assessment and report back to the board at a later date. The department has concerns about the sustainability of these populations.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 77 – 5AAC 85.050. Hunting seasons and bag limits for muskoxen.** Open a resident permit hunt for muskoxen in Unit 26B as follows: Reauthorize registration or drawing muskoxen permits to residents only for Unit 26B.

**PROPOSED BY:** Nicholas Muche

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to re-open muskoxen hunting in Unit 26B. The department already has the authority to re-open this hunt.

**WHAT ARE THE CURRENT REGULATIONS?** Currently, muskoxen seasons in Unit 26B are closed; however, the following regulations remain in codified.



Unit and location	Resident open season	Nonresident open season
Units 26A and 26B, that portion west of the Dalton Highway	Aug. 1–Mar. 31 (Subsistence hunt only)	No open season
1 muskox by Tier II subsistence permit only; up to 20 muskoxen may be taken ( <i>Permits were issued for east of longitude 153 and west of DHCMA</i> )		
Unit 26B, that portion east of the Dalton Highway	Season to be announced (Subsistence hunt only)	No open season
1 muskox by Tier I permit only ( <i>Permits were issued east of the DHCMA</i> )		
Or		
1 bull by drawing permit only if the harvestable surplus is greater than 4 muskoxen; up to 5 muskoxen may be taken	Sept. 20–Oct. 10 Mar 10–Mar. 30	

Other relevant regulations include the following:

Unit 26B has a positive C&T finding for muskoxen, and an ANS of 20 muskoxen west of the DHCMA and 4 muskoxen east of the DHCMA.

The Dalton Highway Corridor Management Area (DHCMA) includes an area extending 5 miles on both sides of the Dalton Highway between the Yukon River and the Arctic Ocean. The DHCMA (5 miles on either side of the Dalton Highway) and the Prudhoe Bay Closed Area (PBCA) are closed to hunting; however, big game, small game, and fur animals may be taken by bow and arrow only, and small game may also be taken by falconry. In addition, the PBCA is closed to the taking of big game.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

Opportunity to hunt muskoxen in Unit 26B would be provided.

**BACKGROUND:** This muskoxen population appears to be nearing the minimum population objective of 300 muskoxen ≥1-year old needed to open this hunt. However, the population trend is unknown.

Muskoxen populations in Alaska disappeared in the late 1800s or early 1900s (Lent 1998). During 1969 and 1970, muskoxen from Nunivak Island were reintroduced into Units 26C and 26B, respectively. The number of muskoxen in Unit 26C increased steadily through the 1980s and

expanded eastward into Canada and westward into Unit 26B and eastern Unit 26A through the early 1990s. The population was considered stable during the mid-1990s at around 500–600 in Alaska, and approximately 100 animals in Canada. However, in 1999, calf production, yearling recruitment, and the number of adults declined substantially in Unit 26C, and since 2004, the number of muskoxen observed in Unit 26C has ranged from 1 to 44 animals. Muskoxen numbers in Unit 26B declined to 216 by 2006, and during 2007–2017, the population averaged approximately 200 muskoxen per year.

Unit 26B Regulatory History: By 1990, most of the muskoxen population in Unit 26B inhabited the area east of the Dalton Highway. Regulations for hunting were established as follows: During RY90–RY97, Tier II permits for 1 bull muskox were issued for east of the DHCMA. During RY98–RY04, Tier I permits for 1 muskox were issued for east of the DHCMA (harvest quota = 4); and 3 drawing permits for 1 bull were issued for east of the Dalton Highway. Tier II permits were issued west of the DHCMA during RY95–RY05, with a bag limit of 1 bull during RY95–RY97 and 1 muskox during RY98–RY05.

By 2004, the Unit 26B muskoxen population declined to approximately 200 animals. Beginning in RY05, no Tier I or drawing permits were issued east of the DHCMA. Beginning in RY06, no Tier II permits were issued west of the DHCMA.

During RY90–RY97, Unit 26B harvest ranged between 0 and 3 bull muskoxen at a harvest rate of 0–2% under a Tier II permit. During RY98–RY05, harvest ranged between 3 and 14 muskoxen (mean=7.5) with a harvest rate of 1–5 % (mean=3%) under Tier II, Tier I, and drawing hunts combined.

Muskoxen Recovery Plan: During the January 2012 meeting, the board adopted a Unit 26B Muskoxen Recovery Program (*Operational Plan for Unit 26B Muskox Recovery 2012–2018*, [ADF&G 2012]) which authorized a predation control plan to reduce the effects of brown bear predation on muskoxen. The operational plan is available here <http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.unit26b#anchor> .

The recovery plan prescribes a muskoxen population objective in Unit 26B to be increased from 190 (population size in April 2011) to at least 300 muskoxen  $\geq$ 1-year-old. ADF&G predicted this growth would take at least 7 years if the strategy was successful. Once the population reached 300 animals  $\geq$ 1-year, the department would consider re-opening a hunt and would maintain a harvest rate of 1–3% per year of the spring precalving population in eastern Unit 26A and Unit 26B until the population in eastern Unit 26A, Unit 26B, and Unit 26C exceeded 650 muskoxen.

The 2019 muskox population estimate in eastern Unit 26A and Unit 26B was 297 muskoxen and has nearly reached the minimum objective of 300 muskoxen  $\geq$ 1-year old needed to consider re-opening a hunt. In 2019, calf production was good, summer calf survival was moderate, but some adult female mortality occurred during the year.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal. The muskoxen population has nearly reached the minimum objective of 300 muskoxen  $\geq$ 1-year-old. We recommend first determining the trajectory of this population and allowing time for additional

population growth, which could result in the ability of the board and the department to more successfully implement a sustainable hunt.

If a hunt is implemented, the department will apply a 1% harvest rate which results in an allowable harvest of 3 bull muskoxen. Of those 3 bulls, the allowable harvest west of the Dalton Highway is 1 bull muskox, and east of the Dalton Highway is 2 bull muskoxen. Given the ANS in the area, these would likely be offered as Tier II permits.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 78 – 5AAC 92.010 (g). Harvest tickets and reports.** Eliminate the registration caribou permit RC907 and the general season caribou harvest ticket requirement for North Slope residents (Point Hope, Anaktuvuk Pass, residents of Unit 26) in portions of Unit 23 and 24B, and in all of Unit 26A, 26B, and 26C.

**PROPOSED BY:** North Slope Fish & Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Proposal 78 would eliminate the requirement for North Slope residents to obtain caribou harvest tickets to hunt caribou and report their harvest in a portion of Unit 24B, Unit 26B, and Unit 26C. Regulations associated with RC907 will be addressed at the Region V board meeting under Proposal 28.

**WHAT ARE THE CURRENT REGULATIONS?**

**5AAC 92.010(g). Harvest tickets and reports.** For caribou, a person may not hunt caribou, except in a permit hunt, unless the person has in possession a harvest ticket and has obtained a harvest report (issued with the harvest ticket).

There are 4 caribou herds that range through Units 24B, 26B and 26C. The board has found positive C&T use determinations for the Western Arctic herd, the Teshekpuk herd, the Porcupine herd, and the Central Arctic herd. ANSs are 8,000–12,000 Western Arctic and Teshekpuk combined), 1,250–1,550, and 250–450 caribou, respectively.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposal would eliminate the requirement for North Slope residents to obtain caribou harvest tickets to hunt caribou and report their harvest in a portion of Unit 24B, Unit 26B, and Unit 26C. Harvest Tickets are used by the department to inform management decisions which allow biologists to manage wildlife populations on sustained yield principles. Lack of harvest data represents a challenge to the management of caribou in Units 24B, 26B, and 26C.

**BACKGROUND:** North slope communities hunting these subunits include Anaktuvuk Pass, Utqiagvik, Nuiqsut, and Kaktovik. Prior to the requirement of caribou harvest tickets in regulatory year 2016, all hunters living and hunting caribou north of the Yukon River drainage were required to register with Alaska Department of Fish and Game (ADF&G) or an authorized

representative. This requirement did not include mandatory reporting and provided minimal harvest information.

Accurate harvest estimates are a critical component of sustainable management across the wide range of the Central Arctic and Porcupine caribou herds. The adoption of a harvest ticket with mandatory reporting requirements was a step toward collecting the harvest information needed for caribou management. It is important to acknowledge that new reporting requirements usually take many years to show robust success as hunt participants learn the new system. In addition, the department is improving its outreach and education efforts with the introduction to the use of this new harvest reporting system.

Efforts by the Division of Subsistence, local entities such as the North Slope Borough, and contracted data collection funded by various agencies and industry have contributed to an important body of historical data regarding caribou harvest. However, currently these data do not provide comprehensive depictions of annual harvest needed for responsive management, which is necessary when attempting to allocate limited resources, prevent overharvest, and maximize hunting opportunity. The new mandatory reporting system is designed to improve data collection efforts.

The Central Arctic caribou herd (CAH) declined substantially in 2016 which resulted in more restrictive hunting regulations beginning RY2017. Obtaining comprehensive harvest data and managing harvest for this herd is critical because the herd has remained stable since 2016, and the department seeks to prevent overharvest, maximize hunting opportunity, and allow some growth in the herd. Harvest data are essential to the department’s ability to manage for all 3 of these purposes. Currently the Porcupine caribou herd population size is large. It is important to maximize hunting opportunity when populations are high and to prevent overharvest if the population declines and harvest data provides the information necessary to manage responsibly.

Regulations associated with the WAH and TCH (Unit 26A and a portion of Unit 23) are also potentially affected by this proposal and will be addressed at the Region V Board of Game meeting.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the mechanism used to collect timely harvest data, and residency requirements of the proposal. The department is **OPPOSED** to eliminating the only existing regulatory means to generate timely harvest data because of biological concerns. The department is interested in working with local users to develop a system that achieves this goal. Caribou harvest information is crucial to sound management of caribou to ensure sustained harvest is maintained.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 79 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** In Unit 26B Remainder, modify the resident season and bag limit for caribou and open a resident-only registration permit hunt for cows.

**PROPOSED BY:** Fairbanks Fish & Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would increase resident hunting opportunity in Unit 26B Remainder for Central Arctic Herd (CAH) caribou by changing the resident bag limit from 2 bulls to 4 bulls and opening the season earlier on 1 July vs. 1 August. In addition, this proposal would open a limited (registration) cow hunt for residents only, after 15 August.

**WHAT ARE THE CURRENT REGULATIONS?** There is a positive C&T finding for the CAH in Unit 26B and an ANS of 250–450 caribou.

The CAH has a positive Intensive Management (IM) finding with a population objective of 28,000–32,000 caribou and a harvest objective of 1,400–1,600 caribou.

**Unit 26B, Northwest:** That portion north of 69° 30' N. Lat. and west of the east bank of the Kuparuk River to a point at 70° 10' N. Lat., 149° 04' W. Long., then west about 22 miles to 70° 10' N. Lat., 149° 56' W. Long., then following the east bank of the Kalubik River to the Arctic Ocean):

- Resident hunters: 5 caribou per day  
Bulls: no closed season  
Cows: 1 July–15 May
- Nonresident hunters: One bull  
1 Aug–15 Sep

**Unit 26B, Remainder**

- Resident hunters: 2 bulls total  
1 Aug–30 Apr
- Nonresident hunters: One bull  
1 Aug–15 Sep

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Caribou hunting opportunity in Unit 26B would increase for resident hunters. The increase in resident harvest is expected to be small.

**BACKGROUND:** Harvest of 231 CAH caribou during regulatory year 2017 (RY17, that is 1 July 2017 through 30 June 2018) and 215 caribou during RY18 was far below the allowable harvest of 840 caribou. Therefore, additional bull harvest is sustainable. However, additional cow harvest could slow or halt population growth.

The department applied a 3% harvest rate to the 2017 population estimate of 28,051 caribou to determine the allowable harvest of 840 caribou, of which no more than 75 can be cows. The 2017 population estimate was used for RY17–RY19. In addition, the bull-to-cow ratio in fall 2019 was 50 bulls per 100 cows, above the management objective of 40 bulls per 100 cows.

The current management objective for the CAH is a population of at least 28,000–32,000 caribou, which reflects the IM objective.

The CAH declined substantially from approximately 68,000 caribou in 2010 to approximately 23,000 caribou in 2016. Data from radiocollared caribou indicated that lower adult female survival was the most important factor in the decline, followed by emigration to the Porcupine and Teshekpuk caribou herds. The most recent population estimate in 2017 indicated a population size of 28,051 caribou. Based on demographic data (e.g., adult female survival, parturition rates, bull:100 cow ratios) collected during 2017 through 2019, the population is likely stable or has declined some (mortality rates for adult females was high in RY18).

During the March 2017 meeting, the board reduced seasons and bag limits for both residents and nonresidents for caribou in Unit 26B in response to the decline observed in 2016. Although harvest was not identified as a factor in the decline, the population had declined to 22,630 caribou and the department’s objective was to apply a 3% harvest rate and limit cow harvest to allow growth in the herd. Therefore, to meet this objective, the number of caribou harvested needed to be reduced; consequently, more restrictive regulations were implemented.

Caribou regulations in Unit 26B prior to RY17 were more liberal, and the current regulations that went into effect on 1 July 2017 are described above.

Total reported harvest in RY17 (231 caribou) and RY18 (215) and estimated local unreported harvest (100 caribou based on subsistence household surveys in Unit 26B communities) was far below the estimated allowable harvest of 840 caribou. Reported resident and nonresident hunter numbers, harvest, and success rates for the previous 2 years are described in Table 79-1. Reported percent successful hunters for all hunters was 35% in RY17 and 40% in RY18 (Table 79-1). Reported percent successful hunters for all hunters during RY10–RY15 ranged 47–57%, when the herd was considerably larger.

Reported harvest in RY17 and RY18 indicated that 84 and 82 resident hunters, respectively, harvested 1 bull caribou. In RY17, 11 resident hunters reported harvesting 2 bull caribou and in RY18, 17 resident hunters reported harvesting 2 bull caribou. During RY10–R15, an average of 101 resident hunters harvested 2 caribou, 31 resident hunters harvested 3 caribou, and 12 resident hunters harvested 4 caribou. If this proposal is adopted, the average number of resident hunters harvesting 3 and 4 caribou (limited to bulls only) would be considerably less than the average number harvested during RY10–RY15; therefore, the increase in resident harvest is expected to be small (<100 caribou).

**Table 79-1. Number of hunters and harvest by residency for CAH in Unit 26B, regulatory years 2017 and 2018.**

Regulatory Year	Resident Hunters	Resident Harvest (% success <sup>a</sup> )	Nonresident Hunters	Nonresident Harvest (% success <sup>a</sup> )	Total Hunters <sup>b</sup>	Total Harvest (% success <sup>a</sup> )
2017	348	109 (31%)	268	119 (44%)	617	231 (38%)
2018	295	116 (39%)	195	99 (51%)	490	215 (44%)

<sup>a</sup> Percent success is calculated by dividing successful hunters by number of total hunters which equals percent successful hunters.

<sup>b</sup> Total hunters may not equal resident hunters plus nonresident hunters because of unknown hunter residency.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding on the portion of this proposal that requests to change the bag limit for resident hunters from 2 bulls to 4 bulls and to open the season 1 July instead of 1 August, because this portion of the proposal is an allocation issue (see proposal 81 which requests an increase in nonresident opportunity, and proposal 80 which requests a decrease in nonresident opportunity) because there is opportunity for more harvest. Harvest has been low since restricted regulations were implemented in RY17 (reported harvest is about 220 caribou and estimated local unreported harvest based on subsistence household surveys is 100); therefore, opportunity to harvest more bulls does exist (allowable harvest = 840), provided that bull-to-cow ratios do not decline substantially and the population does not decline.

The department **OPPOSES** a registration hunt for cows in Unit 26B, particularly in the fall season, which is when most cows were harvested in previous years. Moderate gains in growth of the CAH could be curtailed if additional cows are harvested.

The department estimates that 20–30 cows are harvested in Northwestern Unit 26B. There may be limited opportunity for harvest of up to 40 cows in Unit 26B remainder, but the department opposes a registration hunt because of the uncertainty in the number of cows that would be harvested, even with a short reporting period. Cow harvest in the fall was high during RY10–RY16 with an average of 240 cows harvested annually (although more hunters and caribou were on the landscape during this period).

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 80 – 5AAC 85.025. Hunting seasons and bag limits for caribou.** In Unit 26B Remainder, increase the resident season and bag limit for caribou, open a resident registration permit hunt for cows with a quota, and decrease nonresident hunting opportunity by changing it from a harvest ticket hunt to a registration permit, and imposing a quota.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** Increase resident hunting opportunity in Unit 26B Remainder by increasing the resident bag limit from 2 to 5 bulls and opening the season earlier on 1 July vs 1 August. In addition, open a resident-only registration cow hunt with a defined harvest quota for 15 Aug–30 Mar for 1 cow, with a reporting requirement of 5 days, and no more than 5 caribou total may be taken. The proposal would also change the existing nonresident hunt currently managed with a harvest ticket to a registration permit hunt with a quota and strict reporting requirements, and in-season management requirements that stipulate nonresident take accounts for no more than 10% of the harvest.

**WHAT ARE THE CURRENT REGULATIONS?** There is a positive C&T finding for the Central Arctic caribou herd (CAH) in Unit 26B and an ANS of 250–450 caribou.

The CAH has a positive Intensive Management (IM) finding with a population objective of 28,000–32,000 caribou and a harvest objective of 1,400–1,600 caribou.

**Unit 26B, Northwest** (That portion north of 69° 30' N. Lat. and west of the east bank of the Kuparuk River to a point at 70° 10' N. Lat., 149° 04' W. Long., then west about 22 miles to 70° 10' N. Lat., 149° 56' W. Long., then following the east bank of the Kalubik River to the Arctic Ocean):

- Resident hunters: 5 caribou per day  
Bulls: no closed season  
Cows: 1 July–15 May
- Nonresident hunters: One bull  
1 Aug–15 Sep

**Unit 26B, Remainder**

- Resident hunters: 2 bulls total  
1 Aug–30 Apr
- Nonresident hunters: One bull  
1 Aug–15 Sep

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would decrease nonresident hunting opportunity based on the department's projection of resident harvest, such that nonresidents would be allowed to take no more than 10% of the total harvest and the hunt would close when the quota is met. Resident harvest would also be increased due to the new registration hunt for cows and the change from 2 bulls to 5 bulls in the remainder of Unit 26B.

**BACKGROUND:** Harvest of 231 CAH caribou during regulatory year 2017 (RY17, that is 1 July 2017 through 30 June 2018) and 215 caribou in RY18 was far below the allowable harvest of 840 caribou. Therefore, additional bull harvest is sustainable. Demographic data suggest the CAH can grow without compromising nutritional condition. However; additional cow harvest could slow or halt population growth.

The department applied a 3% harvest rate to the 2017 population estimate of 28,051 caribou to determine the allowable harvest of 840 caribou, of which no more than 75 can be cows. The 2017 population estimate was used for regulatory years 2017–2019 (RY17–RY19; a regulatory year is 1 July through 30 June, for example RY17 is 1 July 2017 through 30 June 2018). In addition, the bull-to-cow ratio in fall 2019 was 50 bulls per 100 cows, above the management objective of 40 bulls per 100 cows.

The current management objective for the CAH is a population of at least 28,000–32,000 caribou, which reflects the IM objective.

The CAH declined substantially from approximately 68,000 caribou in 2010 to approximately 23,000 caribou in 2016. Data from radiocollared caribou indicated that lower adult female survival was the most important factor in the decline, followed by emigration to the Porcupine and Teshekpuk caribou herds. The most recent population estimate in 2017 indicated a



population size of 28,051 caribou. Based on demographic data (e.g., adult female survival, parturition rates, bull:100 cow ratios) collected during 2017 through 2019, the population is likely stable or has declined some (mortality rates for adult females was high in RY18).

During the March 2017 Board of Game meeting, the board reduced both resident and nonresident seasons and bag limits for caribou in Unit 26B in response to the decline observed in 2016. Although harvest was not identified as a factor in the decline, the population had declined to 22,630 caribou and the department’s objective was to apply a 3% harvest rate and limit cow harvest to allow growth in the herd. Therefore, to meet this objective, the number of caribou harvested needed to be reduced; consequently, more restrictive regulations were implemented.

Caribou regulations in Unit 26B prior to RY17 were more liberal, and the current regulations that went into effect on 1 July 2017 are described above.

Total reported harvest of 231 caribou in RY17 and 215 in RY18 and estimated local unreported harvest (100 caribou based on subsistence household surveys in Unit 26B communities) was far below the estimated allowable harvest of 840 caribou. Reported resident and nonresident hunter numbers, harvest, and success rates for the previous 2 years are described in Table 80-1. Reported percent success for all hunters was 35% in RY17 and 40% in RY18 (Table 80-1). Reported percent success for all hunters during RY10–RY15 ranged 47–57%, when the herd was considerably larger.

Reported harvest in RY17 and RY18 indicated that 84 and 82 resident hunters, respectively harvested 1 bull caribou. In RY17, 11 resident hunters reported harvesting 2 bull caribou and in RY18, 17 resident hunters reported harvesting 2 bull caribou. During RY10–R15, an average of 101 resident hunters harvested 2 caribou, 31 resident hunters harvested 3 caribou, and 12 resident hunters harvested 4 caribou. It is likely that in the next few years, the average number of resident hunters harvesting 3 and 4 caribou (limited to bulls only) will be considerably less than the average number harvested during RY10–RY15; therefore, the increase in resident harvest in the next few years is expected to be moderate if this proposal is adopted.

Table 80-1. Number of hunters and harvest by residency for CAH in Unit 26B, regulatory years 2017 and 2018.

Regulatory Year	Resident Hunters	Resident Harvest (% success <sup>a</sup> )	Nonresident Hunters	Nonresident Harvest (% success <sup>a</sup> )	Total Hunters <sup>b</sup>	Total Harvest (% success <sup>a</sup> )
2017	348	109 (31%)	268	119 (44%)	617	231 (38%)
2018	295	116 (39%)	195	99 (51%)	490	215 (44%)

<sup>a</sup> Percent success is calculated by dividing successful hunters by number of total hunters which equals percent successful hunters.

<sup>b</sup> Total hunters may not equal resident hunters plus nonresident hunters because of unknown hunter residency.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding the portion of this proposal that requests to change the bag limit for resident hunters from 2 bulls to 5 bulls and to open the season 1 July vs 1 August, because this portion is an allocation issue (See proposal 79 which requests an increase in resident opportunity and proposal 81 which requests an increase in nonresident opportunity.) There is opportunity for more harvest; therefore, this portion of the

proposal is an allocation issue (see proposal 81 which requests an increase in nonresident opportunity, and proposal 80 which requests a decrease in nonresident opportunity.) Harvest has been low since restricted regulations were implemented in RY17 (total harvest = approximately 320 caribou); therefore, opportunity to harvest more bulls does exist (allowable harvest = 840), provided that bull-to-cow ratios do not decline substantially, and the population does not decline.

The department **OPPOSES** a registration hunt for cows in Unit 26B, particularly in the fall season which is when most cows were harvested in previous years. Moderate gains in growth of the CAH could be curtailed if additional cows are harvested.

The department estimates that 20–30 cows are harvested in Northwestern Unit 26B. There may be limited opportunity for harvest of up to 40 cows in Unit 26B remainder; but the department opposes a registration hunt because of the uncertainty in the number of cows that would be harvested, even with a short reporting period. Cow harvest in the fall was high during RY10–RY16 with an average of 240 cows harvested annually (although more hunters and caribou were on the landscape during this period). In RY16, when the herd had declined substantially, the cow harvest represented 46% of the harvest.

The department is **NEUTRAL** on the portion of the proposal that would decrease nonresident hunting opportunity because this is an allocation issue. However, if the board adopted the proposal as outlined, to set a harvest quota of 10% of the total harvest, the department **OPPOSES** a registration hunt as a mechanism to maximize use of all estimated sustainable harvest. For example, if the department used the total harvest from RY18 of 315 caribou (reported + estimated), the nonresident harvest quota would be 31–32 bulls, which would be impracticable to manage with a 5-day reporting period. Allocating a percent harvest in-season would be difficult to implement and the department does not currently have a mechanism to do this.

**COST ANALYSIS:** Adoption of this proposal would result in minimal additional costs to the department.

\*\*\*\*\*

**PROPOSAL 81 – 5AAC 85.025. Hunting seasons and bag limits for caribou.** Increase the nonresident bag limit for caribou in Unit 26 from 1 bull to 2 bulls.

**PROPOSED BY:** Howard Tieden

**WHAT WOULD THE PROPOSAL DO?** Increase nonresident hunting opportunity in Unit 26B for caribou by changing the nonresident bag limit from 1 bull to 2 bulls. The bag limit in 26C is currently 2 bulls; thus, this proposal would have no effect in Unit 26C. Unit 26A was addressed at the January 2020 Region V Board of Game meeting in Proposal 27.

**WHAT ARE THE CURRENT REGULATIONS?** There is a positive C&T finding for the Central Arctic caribou herd in Unit 26B and an ANS of 250–450 caribou.

The Central Arctic Caribou Herd (CAH) has a positive Intensive Management (IM) finding with a population objective of 28,000–32,000 caribou and a harvest objective of 1,400–1,600

caribou.

**Unit 26B, Northwest,** That portion north of 69° 30' N. Lat. and west of the east bank of the Kuparuk River to a point at 70° 10' N. Lat., 149° 04' W. Long., then west about 22 miles to 70° 10' N. Lat., 149° 56' W. Long., then following the east bank of the Kalubik River to the Arctic Ocean):

- Resident hunters: 5 caribou per day  
Bulls: no closed season  
Cows: 1 July–15 May
- Nonresident hunters: One bull  
1 Aug–15 Sep

**Unit 26B, Remainder**

- Resident hunters: 2 bulls total  
1 Aug–30 Apr
- Nonresident hunters: One bull  
1 Aug–15 Sep

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Caribou hunting opportunity in Unit 26B would increase for nonresident hunters. The increase in nonresident harvest is expected to be small (<50).

**BACKGROUND:** Harvest of 231 CAH caribou during regulatory year 2017 (RY17, that is 1 July 2017 through 30 June 2018) and 215 caribou during RY18 was far below the allowable harvest of 840 caribou. The department applied a 3% harvest rate to the 2017 population estimate of 28,051 caribou to determine the allowable harvest of 840 caribou, of which no more than 75 can be cows. This number was used for regulatory years 2017–2019. In addition, bull-to-cow ratios in fall 2019 were 50 bulls per 100 cows, above the management objective of 40 bulls per 100 cows.

The current management objective for the CAH is a population of at least 28,000–32,000 caribou, which reflects the IM objective.

The CAH declined substantially from approximately 68,000 caribou in 2010 to approximately 23,000 caribou in 2016. Data from radiocollared caribou indicated that lower adult female survival was the most important factor in the decline, followed by emigration to the Porcupine and Teshekpuk caribou herds. The most recent population estimate in 2017 indicated a population size of 28,051 caribou. Based on demographic data (e.g., adult female survival, parturition rates, bull:100 cow ratios) collected during 2017 through 2019, the population is likely stable or has declined some (mortality rates for adult females was high in RY18).

During the March 2017 meeting, the board reduced caribou seasons and bag limits for both residents and nonresidents in Unit 26B in response to the population decline observed in 2016.

Although harvest was not identified as a factor in the decline, the population had declined to 22,630 caribou and the department’s objective was to apply a 3% harvest rate and limit cow harvest to allow growth in the herd. Therefore, to meet this objective, the number of caribou harvested needed to be reduced; consequently, more restrictive regulations were implemented.

Caribou regulations in Unit 26B prior to RY17 were more liberal. The current regulations that went into effect on 1 July 2017 are described above.

Total reported harvest in RY17 (231 caribou) and RY18 (215) and estimated local unreported harvest (100 caribou) was far below the estimated allowable harvest of 840 caribou. Reported resident and nonresident hunter numbers, harvest, and success rates for the previous 2 years are described in Table 81-1. Reported percent successful hunters for all hunters was 35% in RY17 and 40% in RY18 (Table 81-1). Reported percent successful hunters for all hunters during RY10–RY15 ranged 47–57%, when the herd was considerably larger.

During RY10–RY15, when nonresidents could harvest up to 5 caribou, an average of 182 nonresident hunters reported harvesting 1 caribou and 53 nonresident hunters reported harvesting 2 caribou. If this proposal is adopted, the average number of nonresident hunters harvesting 2 caribou (limited to bulls only) would be considerably less than the average number observed during RY10–RY15; therefore, the increase in nonresident harvest is expected to be small (<50).

**Table 81-1. Number of hunters and harvest by residency for CAH in Unit 26B, regulatory years 2017 and 2018.**

Regulatory Year	Resident Hunters	Resident Harvest (% success <sup>a</sup> )	Nonresident Hunters	Nonresident Harvest (% success <sup>a</sup> )	Total Hunters <sup>b</sup>	Total Harvest (% success <sup>a</sup> )
2017	348	109 (31%)	268	119 (44%)	617	231 (38%)
2018	295	116 (39%)	195	99 (51%)	490	215 (44%)

<sup>a</sup> Percent success is calculated by dividing successful hunters by number of total hunters which equals percent successful hunters.

<sup>b</sup> Total hunters may not equal resident hunters plus nonresident hunters because of unknown hunter residency.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it is an allocation issue, since there is opportunity for more harvest (see proposals 79 and 80 which request an increase in resident opportunity). Harvest has been low since restricted regulations were implemented in RY17 (reported harvest = approximately 220 caribou and estimated additional local unreported harvest =100); therefore, opportunity to harvest more bulls exists (allowable harvest = 840), provided that bull-to-cow ratios do not decline substantially and the population does not decline.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 82 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. and 5 AAC 92.530(X). Management areas.** Establish the Arctic Village Sheep Management Area (AVSMA) in Unit 25A, open a new resident and nonresident drawing hunt for sheep within the

management area, and change the bag limit for registration permit RS595.

**PROPOSED BY:** Eastern Interior Alaska Subsistence Regional Advisory Council

**WHAT WOULD THE PROPOSAL DO?** Create the Arctic Village Sheep Management Area (AVSMA, already defined by federal regulation) in state regulation, create a drawing permit hunt and modify the youth hunt within the management area, and change the bag limit for RS595 in the management area and east of the Middle Fork Chandalar in Unit 25A.

**WHAT ARE THE CURRENT REGULATIONS?** There is no management area in this portion of the state under state regulations. The AVSMA is defined in federal regulation as: the area bounded on the east by the East Fork Chandalar River beginning at the confluence of Red Sheep Creek and proceeding downstream to the confluence with Crow Nest Creek; continuing up Crow Nest Creek, through Portage Lake, to its confluence with the Junjik River; then down the Junjik River past Timber Lake and a larger tributary, to a major unnamed tributary, northwesterly, for approximately 6 miles where the stream forks into two roughly equal drainages; the boundary follows the easternmost fork, proceeding almost due north to the headwaters and intersects the Continental Divide; the boundary then follows the Continental Divide easterly, through Carter Pass; then easterly and northeasterly approximately 62 miles along the divide to the head waters of the most northerly tributary of Red Sheep Creek; then follows southerly along the divide designating the eastern extreme of the Red Sheep Creek drainage; and then to the confluence of Red Sheep Creek and the East Fork Chandalar (see map). By federal regulation, the AVSMA is closed to sheep hunting except for federally qualified subsistence hunters of Arctic Village, Chalkyitsik, Fort Yukon, Kaktovik, and Venetie.

The RS595 Tier I subsistence hunt area includes all of Unit 26C and that portion of Unit 25A east of the Middle Fork Chandalar River (see map in Fig. 82.1). The hunt is open to residents only during Oct. 1–Apr. 30 with a bag limit of 3 sheep. The use of aircraft for access to hunt sheep and to transport harvested sheep is prohibited except into and out of Arctic Village and Kaktovik airports. There is no motorized access from the Dalton Highway.

All of Unit 25A has a resident and nonresident general season full curl season during Aug. 10–Sept. 20 and a youth full curl season during Aug. 1–5. Nonresidents may only harvest 1 ram every 4 years. Units 23, 24, 25A and 26 have a positive C&T finding for sheep and a combined ANS of 75–125 sheep.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would change the hunt structure by allocating hunting opportunity between several user groups under state regulation. The AVSMA would be created in state regulation along with a youth hunt; a drawing permit hunt for residents and nonresidents; and would change the existing bag limit for sheep taken under the RS595 hunt within the AVSMA and that portion of Unit 25A east of the Middle Fork Chandalar River (see table below for proposed regulatory changes:

Unit 25A – Sheep, proposed changes				
Resident	East of Middle Fork of Chandalar River, <b><u>excluding the Arctic Village Sheep Management Area</u></b>	One ram with full-curl horn or larger. Youth hunt only	HT	Aug 1–Aug 5
Resident		One ram with full-curl horn or larger.	HT	Aug 10–Sept 20
Resident		[THREE SHEEP] <b><u>One ram with full-curl horn or larger</u></b> by permit.	RS595	Oct 1–Apr 30
Nonresident		One ram with full-curl horn or larger every 4 regulatory years.	HT	Aug 10–Sept 20
<b><u>Resident</u></b>	<b><u>Arctic Village Sheep Management Area</u></b>	<b><u>One ram with full-curl horn or larger. Youth hunt only.</u></b>	<b>HT</b>	<b>Aug 1–Aug 5</b>
<b><u>Resident</u></b>		<b><u>One ram with full-curl horn or larger every 4 regulatory years by permit.</u></b>	<b><u>DSXX</u></b> <b><u>X</u></b>	<b><u>Aug 10–Sept 20</u></b>
<b><u>Resident</u></b>		<b><u>One ram with full-curl horn or larger every 4 regulatory years by permit.</u></b>	<b><u>RS595</u></b>	<b>Oct 1–Apr 30</b>
<b><u>Non-resident</u></b>		<b><u>One ram with full-curl horn or larger every 4 regulatory years by permit.</u></b>	<b><u>DSXX</u></b> <b><u>X</u></b>	<b><u>Aug 10–Sept 20</u></b>

**BACKGROUND:** The AVSMA was first created in 1991 by the Federal Subsistence Board (FSB) which closed the area to sheep hunting except by federally qualified subsistence hunters. The FSB expanded the AVSMA to include the drainages of Cane Creek and Red Sheep Creek in 1995. The Federal closure was rescinded for Cane Creek and Red Sheep Creek during 2006–2011 and then reenacted in 2012 and has remained that way since.

The U.S. Fish and Wildlife Service (USFWS) Office of Subsistence Management reports that a total of 33 federal permits were issued to local subsistence hunters for the AVSMA during 1995–2017 (average = 1.4 per year). A total of 8 sheep were harvested (average = 0.3 per year) by 14 hunters (average = 0.6 per year) during this period. Additional harvest may have occurred by hunters who either did not obtain a federal permit or did not report.

During 2006–2011, the Cane Creek and Red Sheep Creek portion of the AVSMA was open to a state managed full-curl general season. During that period, a total of 40 hunters (average = 6.7 per year) harvested 27 sheep (average = 4.5 per year) from the Uniform Coding Unit (UCU; the geographic area within a unit to which harvest is assigned based on the kill location description from harvest reports) 25A-Y03-0507 that encompass Cane Creek and Red Sheep Creek (see map). Some of this harvest likely occurred outside Cane Creek and Red Sheep Creek since this UCU also includes an area northeast of those drainages (see map).

The hunt area for state Tier I subsistence hunt RS595 includes all of Unit 26C and that portion of Unit 25A east of the Middle Fork Chandalar River (see map). Since 2009, an average of 11

RS595 permits have been issued per year (range = 6–16). Of those, an average of 4 hunters (range = 1–8), harvested 3 sheep (range = 0–7), annually. Of the sheep harvested, 93% were rams with an average age of 8.1 years (range = 3–11). Almost all harvest occurs in Unit 26C (96%) with 100% of the harvest occurring in March or April by snowmachine.

The last surveys of the AVSMA were conducted by the USFWS in 2012 and 2015. Results of those surveys were sheep density estimates of 0.79 and 0.67 sheep/mi<sup>2</sup>, respectively. In 2016, a survey conducted by the USFWS of the Hulahula drainage and the AVSMA, combined, resulted in a sheep density estimate of 0.86 sheep/mi<sup>2</sup>. Surveys conducted by the National Park Service in Gates of the Arctic National Park and Preserve resulted in a sheep density estimate of 0.66 sheep/mi<sup>2</sup> in 2015 and 0.85 sheep/mi<sup>2</sup> in the Itkilik Preserve in 2016. A 2018 survey conducted by the department in eastern unit 25A and western unit 24A resulted in a sheep density of 0.86 sheep/mi<sup>2</sup>. Estimated sheep densities in the AVSMA are similar to other areas of the Brooks Range.

Units 23, 24, 25A and 26 have a positive finding for customary and traditional uses of sheep and a combined amount reasonably necessary for subsistence uses of 75–125 sheep. If this proposal is adopted, there would be a reduction in the bag limit for portions of the RS595 hunt area outside the AVSMA, and the board may wish to consider if reasonable opportunity still exists for subsistence uses.

Estimates of sheep abundance for the entire Brooks Range (Units 23, 24, 25A, and 26) as well as other hunt areas within the Brooks Range (RS595) are unknown because surveys at these large spatial scales have never been conducted. However, extrapolation of sheep densities from smaller survey areas throughout the Brooks Range suggest the following abundances:

Area	Density (sheep/mi <sup>2</sup> )	Abundance (total sheep)
Units 23, 24, 25A, and 26	0.66–0.86 sheep/mi <sup>2</sup>	13,600–19,500 sheep
RS595 hunt area	0.67–0.86 sheep/mi <sup>2</sup>	6,200–8,200 sheep
RS595 hunt area (that portion of 25A only)	0.67–0.86 sheep/mi <sup>2</sup>	3,700–4,700 sheep
AVSMA	0.67 sheep/mi <sup>2</sup>	960 sheep

Based on extrapolated sheep densities for Units 23, 24, 25A, and 26, the upper range of the combined amount reasonably necessary for subsistence uses of 125 sheep represents less than 1% of the population and well within the annual harvestable surplus.

If adopted, proposed changes to the area defined as the AVSMA would not be implemented by the state unless the FSB rescinds the sheep hunting closure to non-federally qualified subsistence users. The FSB will deliberate a proposal to rescind the closure at their April 2020 meeting. The board should also recognize that in 2012 the BOG adopted a proposal that requires persons that hunts sheep within the Red Sheep and Cane Creek drainages within the AVSMA of Unit 25A, must possess proof of completion of a department approved hunter ethics and orientation course,

including land status and trespass information. Because this regulation only applies to a portion of the AVSMA, if the board were to adopt regulations within the entirety of the AVSMA, the department requests that the board determine whether the ethics and orientation course should apply to all of the AVSMA, just that portion within the Cane Creek and Red Sheep Creek drainages, or if the requirement should be modified or eliminated entirely.

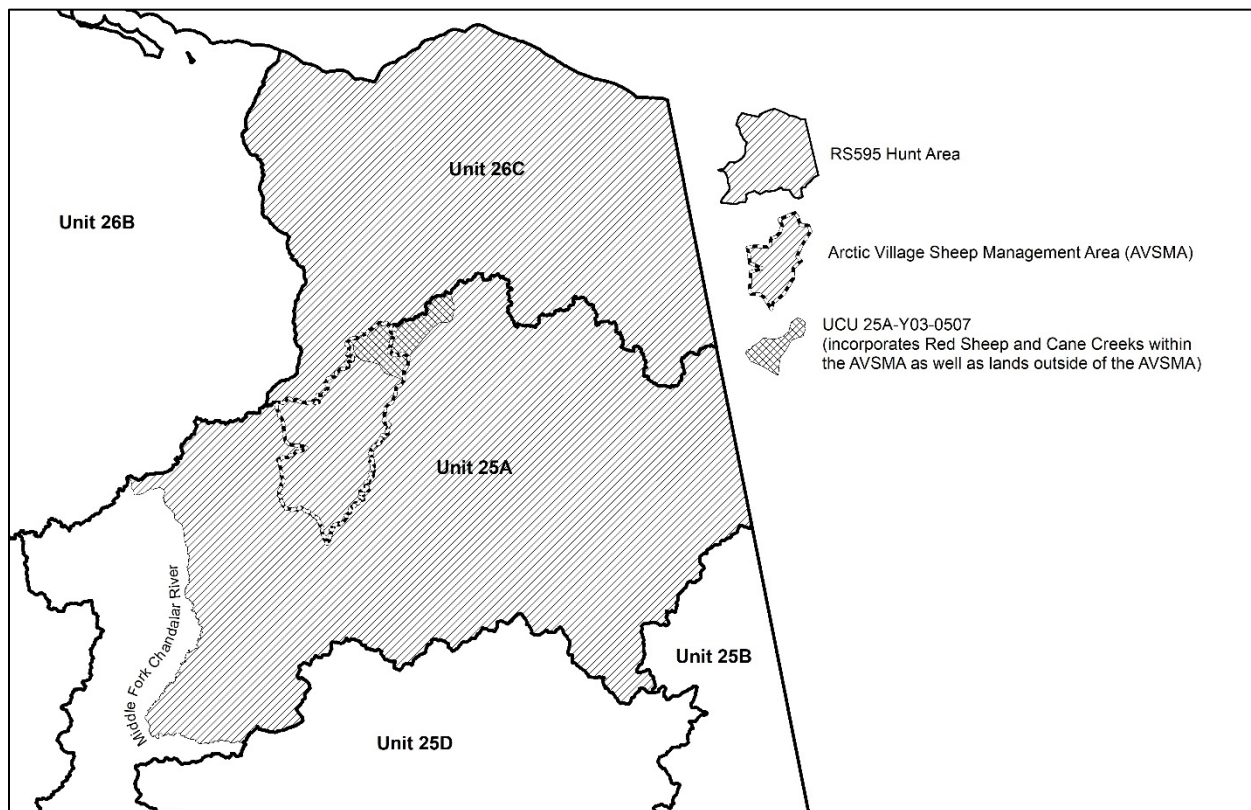


Figure 82.1. RS595 hunt area and proposed AVSMA.

The authors of the proposal state that “the Council views this as a placeholder proposal and will further discuss this proposal at their fall 2019 meeting and will submit additional comments to the Alaska Board of Game by the February 21, 2020, deadline.” As such, the department’s analyses and recommendations only reflect the proposal written in its current state.

**DEPARTMENT COMMENTS:** The department SUPPORTS this proposal to establish a state hunting season for Dall sheep in the Units identified and is neutral on the allocation of permits as described in the proposal. The department has no biological concerns associated with any element of this proposal. Sheep abundance within the AVSMA appears to be similar to other areas of the Brooks Range. Based on full-curl ram bag limits any additional harvest in the AVSMA is unlikely to have any effect on sheep population size. Sheep hunts with a currently-authorized any-sheep bag limit may provide a reasonable opportunity for success in harvesting a sheep for subsistence uses, but may have the potential to reduce population size if the reproductive component (ewes) are overharvested. However, based on long term harvest data for RS595, few sheep are harvested annually and most of the harvest consists of mature rams. Therefore, it is unlikely that sheep populations have been affected by harvest occurring from the



RS595 hunt to date. The board will need to determine if the changes will continue to provide for a reasonable opportunity of success in harvesting sheep for subsistence uses.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 83 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Modify the bag limit for sheep in the RS595 hunt in Unit 26C.

**PROPOSED BY:** Leonard Jewkes.

**WHAT WOULD THE PROPOSAL DO?** This proposal would modify the legal bag limit for sheep in a portion of the RS595 subsistence hunt to 3 sheep, where rams must be  $\frac{3}{4}$  curl horn or smaller, excluding rams with both horn tips broken in Unit 26C. Ewes of any horn configuration would still be legal.

**WHAT ARE THE CURRENT REGULATIONS?** RS595 is open to residents only with a bag limit of 3 sheep during October 1–April 30. The hunt area includes all of Unit 26C and that portion of Unit 25A east of the Middle Fork Chandalar River. The use of aircraft for access to hunt sheep and to transport harvested sheep is prohibited except into and out of Arctic Village and Kaktovik airports. No motorized access is allowed from the Dalton Highway.

All of Unit 26C has a resident and nonresident harvest ticket season for 1 full-curl ram during Aug. 10–Sept. 20 and a youth-only season for 1 full-curl ram during August 1–5. Nonresidents may only harvest 1 ram every 4 years.

There is a positive C&T finding for sheep in Units 23, 24, 25A and 26 and a combined ANS of 75–125 sheep.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Only rams that are  $\frac{3}{4}$  curl horn or smaller, excluding rams with both horn tips broken, would be legal for take under RS595; full curl or larger rams will no longer be legal in this hunt. In the future, hunters seeking large rams may not hunt in RS595 as younger (smaller) rams may be harvested which will reduce the number of mature rams attaining full-curl horns.

**BACKGROUND:** Estimates of sheep abundance for units 26C and 25A, or for the RS595 hunt area are unknown because surveys at these large spatial scales have never been conducted. However, in 2015, the U.S. Fish and Wildlife Service (USFWS) conducted a sheep survey in a small portion of Unit 25A that resulted in a sheep density estimate of 0.67 sheep/mi<sup>2</sup>. In 2016, the USFWS conducted a survey in a portion of 26C and 25A, combined, which resulted in a sheep density estimate of 0.86 sheep/mi<sup>2</sup>. Extrapolation of sheep densities from these two surveys suggest that sheep abundance is about 3,500 sheep in Unit 26C and 6,200–8,200 sheep in

the RS595 hunt area (includes all of Unit 26C and that portion of 25A east of the Middle Fork Chandalar River).

Since 2009, an average of 11 RS595 permits are issued per year (range = 6–16). Of those, an average of 4 hunters (range = 1–8) harvested 3 sheep (range = 0–7) annually. Of the sheep harvested, 93% are rams with an average age of 8.1 years (range = 3–11). Almost all harvest occurs in Unit 26C (96%) with 100% of the harvest occurring in March or April by hunters accessing the area by snowmachine.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it addresses allocation. The department has no biological concerns associated with the current level of harvest that occurs during the RS595 hunt. Based on extrapolated sheep densities across the hunt area, current harvest is well below 1% of the population and within the annual harvestable surplus. If this proposal is adopted as written, it would change the bag limit for a portion of the RS595 hunt area (Unit 26C) while the remainder of the hunt area (Unit 25A, east of the Middle Fork Chandler River) would maintain the current bag limit. Although not a biological concern, the bag limit would be inconsistent across the hunt area and may warrant separate registration permits for each hunt area.

Units 23, 24, 25A and 26 have a positive finding for customary and traditional uses of sheep and a combined amount reasonably necessary for subsistence uses of 75–125 sheep. If this proposal is adopted, there would be a reduction in the bag limit for portions of the RS595 subsistence hunt area, and the Board may wish to consider if reasonable opportunity is still provided for success in harvesting sheep for subsistence uses.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 84 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Extend the Dall sheep hunting season in the Dalton Highway Corridor Management Area (DHCMA) within Units 24A, 25A, and 26B.

**PROPOSED BY:** Austin Manelick

**WHAT WOULD THE PROPOSAL DO?** This proposal would lengthen the Dall sheep hunting season within the DHCMA in Units 24A, 25A, and 26B from August 10–September 20 to August 10–October 5.

**WHAT ARE THE CURRENT REGULATIONS?** The current Dall sheep hunting season for residents and nonresidents in the DHCMA is during August 10–September 20 and for youth hunters during August 1–5. Nonresidents may only harvest 1 ram every 4 years. The DHMCA extends 5 miles from each side of the Dalton Highway from the Yukon River to the Arctic Ocean, including the Prudhoe Bay Closed Area (PBCA). The area within the PBCA is closed to the taking of big game. The remainder of the DHCMA is open to hunting by bow and arrow only. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game within the DHCMA, except licensed vehicles may be used on the Dalton Highway and

other designated roads described in regulation.

There is a positive C&T finding for sheep in Units 23, 24, 25A and 26 (Brooks Range), with an ANS of 75–125 sheep.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The effect of this proposal would be that residents and nonresidents would be allowed to hunt sheep within the DHCMA until October 5, which would provide 15 days of additional hunting opportunity, compared to the current season length. The department expects additional harvest but no conservation concerns because of the full-curl bag limit.

**BACKGROUND:** Sheep surveys to estimate abundance or trend information for the DHCMA have never been conducted and sheep abundance in the eastern Brooks Range is unknown. A trend count survey in a portion of eastern Unit 24A and western Unit 25A has been conducted in most years since 2002. Results of those surveys indicate sheep abundance is variable but stable.

Based on full-curl ram bag limits any additional harvest in the DHCMA as a result of a longer full-curl hunt is unlikely to have any effect on sheep population size. Harvest of sheep within the DHCMA is unknown because Uniform Coding Units (the geographic area within a Unit to which harvest is assigned based on the kill location description from harvest reports) do not align with the DHCMA. However, during regulatory years 2008–2018, a total of 1,278 sheep were harvested in Units 24A, 25A, and 26B combined. Sheep harvested by bow and arrow accounted for 3% of the harvest, or 41 sheep. On average, only 4 sheep were harvested by bow and arrow annually across Units 24A, 25A, and 26B combined. Annual harvest of sheep by bow and arrow within the DHCMA is likely fewer than 4.

**DEPARTMENT COMMENTS:** The department SUPPORTS the additional harvest opportunity but is **NEUTRAL** regarding the allocative aspects of this proposal. There are no biological concerns associated with a longer season because any additional harvest is expected to be minimal and sustainable. In addition, the season extension would close before the breeding season; therefore, no additional disturbance of sheep breeding behavior would be expected.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 85 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Open an archery-only registration sheep hunt in the Dalton Highway Corridor Management Area (DHCMA) within Units 24A, 25A, and 26B.

**PROPOSED BY:** Austin Manelick

**WHAT WOULD THE PROPOSAL DO?** This proposal would open an archery-only registration hunt during September 20–October 5 or September 25–October 5 within the DHCMA in Units 24A, 25A, and 26B.

**WHAT ARE THE CURRENT REGULATIONS?** The current Dall sheep hunting season for residents and nonresidents in the DHCMA is August 10–September 20 and for youth

hunters during August 1–5. Nonresidents may only harvest 1 ram every 4 years. The DHMCA extends 5 miles from each side of the Dalton Highway from the Yukon River to the Arctic Ocean, including the Prudhoe Bay Closed Area (PBCA). The PBCA is closed to the taking of big game. The remainder of the DHCMA is open to hunting by bow and arrow only. No motorized vehicle may be used to transport hunters, their hunting gear, or parts of game, within the DHCMA, except licensed vehicles may be used on the Dalton Highway and other designated roads described in regulation.

There is a positive C&T finding for sheep in Units 23, 24, 25A and 26 (Brooks Range), with an ANS of 75–125 sheep.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Residents and nonresidents would be allowed to hunt sheep within the DHCMA until Oct. 5, which would provide either 11 or 15 days (depending on the hunt start date) of additional hunting opportunity. The department expects additional harvest but no conservation concern based on full-curl bag limits.

**BACKGROUND:** Sheep surveys to estimate abundance or trend for the DHCMA have never been conducted and sheep abundance in the eastern Brooks Range is unknown. A trend count survey in a portion of eastern Unit 24A and western Unit 25A has been conducted in most years since 2002. Results of those surveys indicate sheep abundance is variable but stable.

Based on full-curl ram bag limits any additional harvest in the DHCMA as a result of a longer full-curl hunt is unlikely to have any effect on sheep populations within the DHCMA. Harvest of sheep within the DHCMA is unknown because Uniform Coding Units (the geographic area within a Unit to which harvest is assigned based on the kill location description from harvest reports) do not align with the DHCMA. However, during 2008–2018, a total of 1,278 sheep were harvested in Units 24A, 25A, and 26B combined. Sheep harvested by bow and arrow accounted for 3% of the harvest or 41 sheep. On average, only 4 sheep were harvested by bow and arrow annually across units 24A, 25A, and 26B combined. Annual harvest of sheep by bow and arrow within the DHCMA was likely less than 4.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it addresses allocation. The department has no biological concerns associated with a longer season because any additional harvest is expected to be minimal and sustainable. In addition, the season extension would close before the breeding season, therefore, no additional disturbance effects on sheep breeding behavior would be expected.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 86– 5 AAC 92.113(a)(1). Intensive Management Plans III.** Reauthorize the Upper Yukon–Tanana Predation Control Program.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the Upper Yukon–Tanana Predation Control Program to benefit the Fortymile Caribou Herd. The Upper Yukon–Tanana Intensive Management (IM) Plan will expire on June 30, 2020. This proposal would reauthorize the department to conduct wolf predation control within the UYTPCA to benefit the FCH during 1 July 2020–30 June 2026. It includes options for aerial wolf control conducted by public permittees and the department.

**WHAT ARE THE CURRENT REGULATIONS?** The department is authorized to conduct wolf control within the Upper Yukon–Tanana Predation Control Area (UYTPCA) to benefit the Fortymile Caribou Herd (FCH) in Units 12, 20B, 20D, 20E, and 25C through June 30, 2020.

**Other relevant regulations include:**

The board has identified the Fortymile caribou herd as being important for providing high levels of harvest for human consumptive use and established Intensive Management (IM) objectives of 50,000–100,000 caribou and an annual harvest of 1,000–15,000.

The Fortymile Caribou herd has a positive C&T finding with an ANS of 350–400 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted the department would be authorized to conduct wolf predation control within the UYTPCA to keep the caribou population and harvest within codified objectives.

**BACKGROUND:** This wolf predation control program was first authorized by the board in 2004 to benefit moose in southern Unit 20E. Wolf and bear control began in 2005. The wolf control portion of the program was expanded to include the FCH in 2006. The bear control portion of the program was deleted in 2009 because it was ineffective at removing bears due to ineffective methods. Moose were removed in 2014 because no focused predation control efforts specifically intended to benefit moose had been conducted since the FCH was added. However, moose were expected to benefit to some degree from wolf control that was conducted to increase the FCH.

Predation control is currently suspended in the Upper Yukon–Tanana predation control area and the department is evaluating the effects of IM in the area. Even though predation control is currently suspended, retaining the ability to resume wolf control is important for managers to respond to caribou population declines in a timely manner to ensure population size and harvest do not decline below IM Objectives.

The estimated FCH population in July 2017 was 83,659 and the annual harvest ranged from 987 to 2,458 caribou/year during regulatory years 2014 through 2018 (RY14–RY18; e.g. RY14 is 1 July 2014 through 30 June 2015). The population is near the mid-point of the IM population objective and the harvest is within the lower end of the IM harvest objective.

Public wolf control has been conducted in the majority of the FCH range since 2006. Department wolf control focused on the FCH calving area was conducted during the winters of 2008–2009, 2009–2010, 2011–2012, and 2017–2018. The wolf predation control objective for the wolf control area is for a wolf population of 88–103 animals. The pre-control wolf population in the wolf control area was estimated in fall of 2004 at 350–410 wolves; a minimum population of 88

wolves is approximately a 75% reduction from the pre-control population and will assure that wolves persist in the plan area.

Additional control program details will be made available for public review in a separate IM operational plan prior to the board meeting.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal so the department can reimplement wolf control in a timely manner if a population decline occurs during 2020–2026 or more caribou harvest is desired to be reallocated from wolves to humans. This will help to ensure that population size and harvest do not decline below IM objectives.

**COST ANALYSIS:** Approval of this proposal would not result in any additional cost to the department.

\*\*\*\*\*

**PROPOSAL 87 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Eliminate the Fortymile caribou registration hunt in Unit 20 and implement a drawing hunt with longer seasons.

**PROPOSED BY:** Janner Morgan

**WHAT WOULD THE PROPOSAL DO?** The proposal seeks to eliminate the Fortymile caribou registration hunt and establish a drawing permit hunt for Fortymile caribou.

**WHAT ARE THE CURRENT REGULATIONS?** Fortymile caribou hunting in Unit 20 is managed under fall (RC860) and winter (RC867) registration hunts, along with Unit 25C. The fall season is open to residents and nonresidents during August 10–September 30, with a bag limit of up to 3 caribou for residents and 1 bull for nonresidents. The winter season is open to residents only during October 21–March 31, with a bag limit of up to 3 caribou. Season openings and bag limits for the Fortymile herd are managed by discretionary permit authority, while hunt closures are frequently implemented by Emergency Order due to unpredictable caribou and hunter distribution. There is also a youth drawing permit for portions of the hunt area: up to 30 permits are available, the season is August 1 - August 21, with a bag limit of 1 caribou per lifetime.

The board has identified the Fortymile caribou herd as being important for providing high levels of harvest for human consumptive use and established Intensive Management (IM) objectives of 50,000–100,000 caribou and an annual harvest of 1,000–15,000.

The Fortymile Caribou Herd has a positive C&T finding with an ANS of 350–400 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If drawing permits are used in Unit 20, it may cause more people to hunt Fortymile caribou in a smaller area than under a registration permit in Unit 25C. If the entire Fortymile hunt area is changed to drawing permit hunts, the department may need to issue an unlimited number of drawing permits to ensure harvest objectives are met by allowing enough hunters to be in the field when the herd moves through different areas. Without adequate harvest the herd could grow beyond sustainable

levels, increasing the risk of a precipitous decline, resulting in the population and harvest declining below IM objectives as well as needing to be provided under a Tier II hunt.

In some years, a limited number of drawing permits could substantially reduce the likelihood of achieving Fortymile herd harvest objectives and would result in reduced opportunity to harvest a caribou. Under a drawing permit hunt, applicants would apply and pay the application fee during the previous fall. This would likely reduce the number of hunters obtaining permits, but would not reduce hunter numbers enough to address the hunt quality or safety issues the proponent is concerned about. Opportunity for subsistence uses of the Fortymile herd would likely be reduced due to the random nature of drawing hunt structures.

**BACKGROUND:** The Fortymile Caribou Herd is an important resource for subsistence uses. Drawing permit hunts for the Fortymile herd have not been adopted by the board because of concerns regarding the statutory requirement to provide a reasonable opportunity for subsistence uses, which is defined under Alaska Statute 16.05.258(f). Additionally, a limited number of available permits may hamper the ability to meet IM harvest objectives.

The board endorsed the Fortymile Caribou Herd Harvest Plan (harvest plan), which guides herd management. The harvest plan was developed by the Fortymile Harvest Management Coalition, consisting of members of the Anchorage, Central, Delta, Eagle, Fairbanks, Matanuska Valley, and Upper Tanana–Fortymile advisory committees, and the Eastern Interior Regional Subsistence Advisory Council in cooperation with the Yukon Fish and Wildlife Management Board, the Yukon Department of Environment, Yukon First Nations, the Bureau of Land Management, and the Alaska Department of Fish and Game. Management provisions specific to Alaska were developed by the Alaska delegates of the coalition. Yukon delegates abstained from Alaska hunt management decisions. The harvest plan can be viewed online at: [http://www.adfg.alaska.gov/static/research/plans/pdfs/fortymile\\_harvest\\_plan\\_2012\\_2018.pdf](http://www.adfg.alaska.gov/static/research/plans/pdfs/fortymile_harvest_plan_2012_2018.pdf)

**DEPARTMENT COMMENTS:** While the department is **NEUTRAL** on the allocation aspects of this proposal, a drawing hunt would reduce the number of hunters eligible to receive permits, which will reduce hunter opportunity. The drawing permit hunts could make it difficult to achieve harvest objectives, which could result in growth of the herd beyond sustainable levels and the risk of a precipitous decline and the population and harvest declining below IM objectives. In addition, under the subsistence statute, the board “shall adopt regulations that provide a reasonable opportunity for subsistence uses”, which is defined as an opportunity that provides “a normally diligent participant with a reasonable expectation of success of taking of fish or game” (AS 16.05.258 (b)(2)(A) and (f)). Because of their random nature, drawing permits have not been found to provide a reasonable opportunity for subsistence uses because the chance of success in taking game is reduced.

If the board chooses to eliminate the current registration hunts and establish drawing permit hunts for the herd, the board should consider whether the resulting hunt structure will provide for reasonable opportunity for subsistence uses.

**COST ANALYSIS:** Approval of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 88 – 5AAC 92.113(1). Intensive Management Plans.** Reimplement an intensive management (IM) program for wolves to benefit moose in portions of Unit 12, 20D, and 20E.

**PROPOSED BY:** Upper Tanana–Fortymile Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Implement wolf control under an IM program to benefit moose within portions of Units 12, 20D, and 20E.

**WHAT ARE THE CURRENT REGULATIONS?** Moose were removed from the Upper Yukon–Tanana Predator Control Program (UYTPCP) in 2014; therefore, no wolf control activities specifically to benefit moose have been conducted within the proposed area since 2014. However, wolf control to benefit the Fortymile caribou herd (FCH) did occur within portions of the proposed area through spring 2018 as part of the UYTPCP.

The Board of Game (board) has identified the moose populations in Units 12, 20D, and 20E as important for providing high levels of harvest for human consumptive use. The board established IM population objectives of 4,000–6,000 moose in Unit 12 and 8,000–10,000 moose in both Units 20D and 20E. The IM harvest objectives are 250–400, 500–700, and 500–1,000 for Units 12, 20D, and 20E, respectively.

The board made a positive customary and traditional use finding for moose in Unit 12, Unit 20E, and a portion of Unit 20D. The amount reasonably necessary for subsistence uses (ANS) is 60–70 moose in Unit 12 and 50–75 moose in Unit 20E. The ANS for the portion of Unit 20D north of the Tanana River and outside of the Fairbanks Nonsubsistence Area is 5–15 moose, while the ANS for the portion of 20D south of the Tanana River and outside of the Fairbanks Nonsubsistence Area is 5 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, the department will complete a feasibility assessment. This would help the board determine the feasibility of an IM program with wolf control as the primary mechanism to benefit moose within a 6,710 mi<sup>2</sup> portion of Units 12 (1,167 mi<sup>2</sup>; 12% of Unit 12), 20D (401 mi<sup>2</sup>; 7% of Unit 20D), and 20E (5,142 mi<sup>2</sup>; 48% of Unit 20E). The assessment would be presented to the board, and the board would then determine whether to adopt regulations to implement predation control.

The proposal includes options for aerial wolf control conducted by public permittees (with a control permit) and the department, and the option for the public retrieval of wolves using private rotorcraft with a control permit.

**BACKGROUND:** The board adopted an IM program to benefit moose using wolf (6,600 mi<sup>2</sup>) and brown bear (2,700 mi<sup>2</sup>) control in a portion of southern Unit 20E in spring 2004 and control permits were issued beginning in regulatory year 2004 (RY04; i.e. RY04 is 1 July 2004 through 30 June 2005.) In RY06, the wolf control portion of the program was expanded to 18,750 mi<sup>2</sup> to benefit the FCH, while the brown bear control portion was expanded to 4,050 mi<sup>2</sup>. The bear control portion of the program was removed in RY09 because the bear removal objectives were not being met. Moose were removed from the program in RY14 because no focused wolf control



specifically intended to benefit moose had been conducted nor was any planned at that time. However, wolf control to benefit the FCH continued through RY17, and it was assumed that moose within the active wolf control portions of the UYT-PCP would continue to benefit to some degree from this wolf control. Public aerial wolf control permits were issued annually during RY04–RY17, and department wolf control using helicopters was conducted during RY08, RY09, and RY11–RY17. The department wolf control was concentrated within the FCH calving and post-calving range during RY11–RY17, only a small portion of which overlaps the proposed area. Because only 6% of the proposed area is within Unit 20D, the remainder of this analysis will focus on Units 12 and 20E.

The most recent unit-wide moose population estimate in Unit 12 exceeds the minimum IM population objective while the Unit 20E population estimate is likely near the minimum IM objective. Reported harvest is below the IM harvest objectives in both units. The current Unit 12 observable moose population estimate, which primarily incorporated survey data from 2017 with small portions from 2011 and 2014 surveys, was 6,394 moose (range 5,279–7,509). The current Unit 20E observable moose population estimate, which incorporated survey data from 2012–2018, was 7,582 moose (range 6,153–9,010). This estimate increases to 8,075 moose (likely range 6,553–9,597) when a sightability correction factor (SCF) of 1.065 is applied. The SCF of 1.065 was the average SCF measured during sightability trials in southern Unit 20E moose surveys during 2017–2018. The Unit 20E estimate includes an extrapolation to 36% of the unit that has not been surveyed recently and the Unit 12 estimate does not include a correction for sightability. Total reported harvest (including reported potlatch harvest) during RY14–RY18 averaged 154 in Unit 12 and 224 in Unit 20E, well below the IM harvest objectives for these units. Achieving the IM harvest objectives is limited to some degree by factors that include land ownership (e.g. federal and private lands) and associated access restrictions in Unit 12 and limited access to the remote portions of both Units 12 and 20E. All areas included within the proposed wolf control area currently have an Alaska resident any-bull bag limit for moose.

Observable moose densities within a 1,821 mi<sup>2</sup> area along the Taylor Highway in southern Unit 20E, located within the proposed predator control area, increased from 0.68 moose/mi<sup>2</sup> (90% confidence interval [CI] ± 0.10 moose/mi<sup>2</sup>) in 2005 to 1.41 moose/mi<sup>2</sup> (90% CI ± 0.27 moose/mi<sup>2</sup>) in 2018, with an estimated annual growth rate of 5% (95% CI ± 1.6%). This increase was likely due to a combination of large wildfires during 2004 and 2005 and wolf control during 2005–2018. During this period, Unit 20E moose harvest increased from an average of 151 annually during 2005–2009 to 224 annually during 2014–2018. Conversely, in recent years, estimated bull-to-cow and calf-to-cow ratios decreased. Early winter bull-to-cow ratio estimates decreased from 37 bulls:100 cows (90% CI ± 10 bulls:100 cows) in 2014 to 26 bulls:100 cows (90% CI ± 8 bulls:100 cows) in 2018. The midpoint bull-to-cow ratio estimate was below the minimum bull-to-cow ratio management objective of 30 bulls:100 cows during both the 2017 (28 bulls:100 cows) and 2018 surveys. Early winter calf-to-cow ratios averaged 32 calves:100 cows during 2005–2010 surveys and 21 calves to 100 cows during 2011–2018 surveys.

The decreased estimated bull-to-cow ratio during recent surveys does not appear to be the result of a decreasing bull population but instead appears to be the result of a relatively stable to slowly increasing bull portion of the population, and a cow portion of the population that is increasing at a faster rate. During 2005–2018 in southern Unit 20E, the bull numbers grew at an average

annual rate of 3% (95% CI ± 1.9%) while the cow numbers grew at twice the rate, at an estimated 6% (95% CI ± 1.9%).

Habitat does not appear to be a limiting factor for the southern Unit 20E moose population. Twinning rates in southern Unit 20E and northern Unit 12 during 2004–2019 averaged 30%, while the 2017–2019 3-year weighted average twinning rate was 34% (90% CI ± 7%). Twinning rates greater than 20% generally indicate that the habitat can likely support a larger population. During 1989–2018, 2,982 mi<sup>2</sup> (44% of the total area) burned in the proposed wolf control area, with most of the area burned during 2004–2005 (2,296 mi<sup>2</sup>). The department is also in the beginning stages of working on a prescribed fire burn plan for portions of southern Unit 20E with the goal of maintaining early seral stage forests, particularly as the large area burned in 2004–2005 matures.

Past research suggests that grizzly bears and wolves are the primary predators of moose in Unit 20E. Research in Unit 20E in the 1980s estimated that grizzly bears killed 22% and wolves killed 8% of the total post-calving moose population, annually. This study also found that grizzly bears were the primary predator on moose calves (killed 52% of radio-collared calves) followed by wolves (12–15%) and black bears (3%). However, this study was conducted when wolf numbers were estimated to be at reduced levels due to 1 year of wolf control. Nevertheless, research conducted in southwestern Yukon Territory during the same period found similar results and concluded that grizzly bears and wolves killed an estimated 26% and 14%, respectively, of the post-calving moose population annually.

Annual wolf harvest within the proposed area during RY04–RY17 averaged 54 (range = 35–78), with most of the harvest taken by hunters/trappers. Hunters/trappers took an average of 34 (range = 14–51) wolves annually, while public aerial wolf control permittees took an average of 15 (range = 1–34), and department-conducted wolf control averaged 4 (range = 0–21).

The proposed area minimizes potential impacts of the proposed wolf control on the ongoing FCH calf mortality and wolf studies. Although the annual range of the FCH overlaps with the proposed area, the FCH calving and post-calving range is outside of the proposed area and the wolf control would likely have minimum impacts on the FCH as a whole.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because no conservation concerns were identified. The board should be aware that this analysis represents an initial review of the proposal and does not represent a feasibility assessment.

One of the primary goals for the proposed wolf control is to maintain or increase the bull-to-cow ratio and thereby avoid more restrictive moose harvest regulations (e.g., antler restrictions) within portions of the proposed area. The other goals of the proposal are to: 1) maintain this moose population near current levels, and 2) maintain moose harvest and success rates near current levels. Should this proposal be adopted, the department recommends that limited cow harvest be allowed in conjunction with the wolf control. Given the recent growth trajectory of the moose population and the fact that the lower estimated bull-to-cow ratios during recent years appear to be the result of cow numbers growing at a faster rate than bull numbers, cow harvest is recommended to both help meet the goal of maintaining the population near current levels and to help maintain or increase the bull-to-cow ratio. In addition, cow harvest would aid in making progress towards achieving IM harvest objectives. However, the department recognizes that

additional steps are needed before antlerless harvest can occur (e.g., a proposal to the Board of Game, a feasibility assessment, and Advisory Committee authorization).

The board also may wish to reconsider the IM harvest objectives for both Units 12 and 20E and whether they are feasible considering access and land ownership patterns within each unit.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs to the department if department wolf control was conducted.

\*\*\*\*\*

**PROPOSAL 89 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Allow hunters in Unit 20E to simultaneously possess registration permits for both caribou (RC860) and moose (RM865).

**PROPOSED BY:** Joel Mitchell

**WHAT WOULD THE PROPOSAL DO?** Allow hunters in Unit 20E to simultaneously possess registration permits for both caribou (RC860) and moose (RM865).

**WHAT ARE THE CURRENT REGULATIONS?** Unit 20E caribou and moose hunters can currently possess either the caribou (RC860) or moose (RM865) permit but cannot simultaneously possess both permits. This restriction applies only to individuals and not to groups of hunters, which means that hunting parties of  $\geq 2$  people can possess a mix of caribou and moose permits as long as no individual hunter possesses both permits simultaneously. In addition, individual hunters can switch from one permit to the other if they first report and close out the permit they are interested in swapping. A small portion (6%) of Unit 20E is open to moose hunting under a moose harvest ticket (GM000), and hunters can simultaneously possess GM000 and RC860 permits. The RC860, GM000, and RM865 seasons and bag limits for Unit 20E are as follows:

Caribou: RC860 (All hunt zones, including Unit 20E):

- Residents: 1 caribou, August 10–September 30
- Nonresidents: 1 bull, August 10–September 30

Moose: GM000 (Drainages of the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage):

- Residents: 1 bull, August 24–28 and September 8–17
- Nonresidents: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side, September 8–17

Moose: RM865 (Unit 20E remainder):

- Residents: 1 bull, August 24–28 and September 8–17
- Nonresidents: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side, September 8–17

The Unit 20E moose population has a positive C&T finding, as determined by the board, with an ANS of 50–75 moose. The Unit 20E moose intensive management (IM) objectives are to maintain a population of 8,000–10,000 moose and a harvest of 500–1,000 moose annually.

The Fortymile caribou herd also has a positive C&T finding, as determined by the board, in Units 12, 20D, 20E, and 25C, with an ANS of 350–400 caribou. The Fortymile caribou herd IM objectives are to maintain a population of 50,000–100,000 caribou and a harvest of 1,000–15,000 caribou annually.

There is a winter Fortymile registration hunt (RC867) but it does not overlap with the fall RM865 season.

In addition to the prohibition of holding both RC860 and RM865 at the same time, the board has also adopted regulations that prohibit proxy hunting for Fortymile and White Mountains caribou registration hunts (RC860 and RC867) and for 20E moose registration hunts (RM865).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Unit 20E hunters would be allowed to simultaneously hunt and harvest moose and caribou throughout the entire unit. This could result in some additional moose and/or caribou harvest during years when seasons overlap.

**BACKGROUND:** The current restriction was instituted in 2001 to reduce moose harvest by an increasing number of Fortymile caribou hunters at a time when moose densities were low (~0.6 moose/mi<sup>2</sup>.) Since 2001, moose densities within southern Unit 20E have increased to approximately 1.4 moose/mi<sup>2</sup> while unitwide moose densities have increased to approximately 0.75 moose/mi<sup>2</sup>. In conjunction with the increase in moose numbers, unitwide moose hunters and harvest have also increased. Moose bull-to-cow ratios are currently near the minimum objective of 30 bulls:100 cows in southern Unit 20E but remain high within the more remote sections of the unit.

During some years, the Fortymile caribou hunt is closed in portions of Unit 20E prior to the start of the Unit 20E moose hunt, while in other years the caribou season is open. The fall Fortymile caribou hunt is regulated via a harvest quota, which is distributed over 4 hunt zones that encompass the hunt area. When the harvest quota is met within a hunt zone, the zone is closed to caribou hunting for the remainder of the season. The portion of Unit 20E that is accessible from the Taylor Highway is located within Zone 3 of the Fortymile caribou hunt, while the more remote portions of Unit 20E are located within Zone 2. During some years, the Fortymile caribou hunt is closed within Zone 3 for the entirety or a portion of the moose season because the caribou harvest quota was met. Due to factors that include the fall distribution of caribou and a larger harvest quota, the Fortymile caribou season has remained open in Zone 3 during the entire moose season during recent years. Excluding 2015, when the Fortymile caribou hunt in Zone 3 closed on 15 September, Zone 3 was open during the entire 10-day September portion of the moose season during 2014–2019 and during the 5-day August portion of the moose season during 2018 and 2019. Zone 2 of the Fortymile caribou hunt, which is more remote and has more limited access than Zone 3, remained open during the entire Unit 20E moose season during 2014–2019. Due to the recent larger Fortymile caribou harvest quota, overlapping moose and caribou seasons are likely to continue in the coming years.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative nature of this proposal, and **SUPPORTS** the additional opportunity for hunters because there are no biological concerns with the populations. This change can be made via the department's discretionary permit hunt conditions authority. However, since the proposed change is largely an

allocation issue, the department requests the board's input on the issue. Although the passage of this proposal might result in additional caribou and/or moose harvest, the department has no biological concerns at this time because: 1) Fortymile caribou harvest is regulated via a quota and the season closes once the harvest quota is met, and 2) estimated moose bull-to-cow ratios are currently near or above the minimum management objectives and the moose population could likely withstand a small increase in harvest in some areas.

If the board passes this proposal, they may also wish to consider eliminating the small portion of Unit 20E open to moose hunting with a general harvest ticket and instead require the RM865 moose registration permit unit-wide. The purpose of the general harvest ticket area is to allow hunters to simultaneously hunt caribou and moose, which would be allowed unit-wide should this proposal pass. The elimination of the general moose harvest ticket area would simplify the Unit 20E moose regulations by requiring the same joint state-federal moose registration permit unit-wide.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 90 – 5AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.** Reduce the proportion of nonresident Tok Management Area sheep draw permits awarded to nonresidents hunting with relatives within second-degree of kindred.

**PROPOSED BY:** Lance Kronberger

**WHAT WOULD THE PROPOSAL DO?** Reduce the proportion of nonresident Tok Management Area (TMA) sheep draw permits awarded to nonresidents hunting with relatives within second-degree of kindred (SDK) from a maximum of 50% to a maximum of 25% of the total nonresident permits.

**WHAT ARE THE CURRENT REGULATIONS?** Of the total TMA draw permits awarded, 10% are allocated to nonresidents. Of the 10% of permits that are allocated to nonresidents, a maximum of 50% are issued to nonresidents hunting with relatives within SDK, while the remainder are issued to guided nonresidents.

The board has made a negative C&T finding for sheep in the TMA.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The number of TMA permits awarded to nonresidents hunting with a guide will increase while the number of TMA permits awarded to nonresidents hunting with SDK family members will decrease. Guided nonresident hunters have higher success rates than nonresidents hunting with SDK, so annual harvest will likely increase slightly.

**BACKGROUND:** Beginning in 2007, the Board of Game (board) limited nonresidents to a maximum of 10% of the TMA permits. In 2008, the board set the nonresident allocation for those nonresidents hunting with SDK to a maximum of 50% of the total nonresident permits.

This change was made due to concerns by some members of the guiding industry who felt that too many permits were awarded to nonresidents hunting with SDK. In 2014, the board changed the nonresident allocation to 10% of the total permits.

During 2015 to 2019, a total of 40 TMA permits were issued to nonresidents (range of 6–10 permits annually). Of these 40 permits, 14 (35%) were issued to nonresidents hunting with SDK out of a maximum of 17 that could have been issued to nonresidents hunting with SDK. The maximum number that could have been issued to nonresidents hunting with SDK was lower than 50% of the total nonresident permits because of how the permits are split between the 2 separate TMA draw hunts (early and late season). The number of TMA permits are split equally between the early and late season, and the allocation of permits for nonresidents hunting with SDK is calculated separately for each draw hunt. For example, when a total of 80 TMA permits are issued, 40 permits (of which 4 can be nonresident permits) are issued for both the early and late draw hunts. Of the 4 nonresident permits for each hunt, a maximum of 2 can be issued to nonresidents hunting with SDK. Conversely, during years when 100 TMA permits are issued, 50 permits (of which 5 are nonresident permits) are issued for both the early and late draw hunts. Therefore, of the 5 nonresident permits for each hunt, a maximum of 2 can be issued to nonresidents hunting with SDK, or a total of 4 out of the 10 nonresident permits.

Guided nonresident TMA hunters have had higher success rates than nonresidents hunting with SDK. During 2014–2018, guided nonresident TMA hunters had an average success rate of 88% while nonresidents hunting with SDK had an average success rate of 68%.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it seeks to address the allocation of nonresident permits, and no biological concerns were identified. Although harvest might increase slightly if this proposal is passed because guided nonresidents historically have had higher success rates than nonresidents hunting with SDK, the increase in harvest will be minimal and will not result in any biological concerns. The board may wish to consider the ramifications associated with this proposal during years when low numbers of permits are issued. During years when 60 permits are issued, no permits would be available to nonresidents hunting with SDK because 25% of 3 permits (3 nonresident permits per draw hunt) is <1 permit.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 91– 5 AAC 85.065. Hunting seasons and bag limits for small game.**

**PROPOSED BY:** Delta Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to reduce both the bag and possession limits for grouse (including ruffed, spruce, and sharp-tailed) to 5 per day, 15 in possession in Unit 20D west of the Johnson River and south of the Tanana River.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20D, that portion lying west of the east bank of the Johnson River and south of the north bank of the Tanana River

Fifteen grouse per day, thirty in possession provided that not more than 5 per day and 10 in possession may be sharp-tailed grouse.....Aug 25–Mar 31

By falconry only: Ten grouse per day, ten in possession, provided that not more than two per day and two in possession may be sharp-tailed grouse.....Aug 10–Aug 24

The portion of Unit 20D west of the east bank of the Johnson River and south of the north bank of the Tanana River is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would align the bag limit for all grouse species in southwestern Unit 20D and reduce the combined bag limit from 15 to 5 birds per day. The possession limit would be reduced from 30 to 15 grouse, provided not more than 10 are ruffed or sharp-tailed. This would reduce the daily bag limit for ruffed and spruce grouse by two-thirds (from 15 to 5) and the overall possession limit by one half (from 30 to 15) in this portion of Unit 20D. Falconry limits also would be reduced from 10 to 5 grouse per day and align possession to 10 grouse, provided not more than 2 may be ruffed grouse or sharp-tailed grouse. This is a 50% overall reduction by falconry and an 80% reduction for ruffed grouse. Daily hunting opportunity would be reduced if this proposal were adopted, but these birds may become available to hunters later in the season. This proposal would also help limit potential violations by hunters who shoot too many of one species and are unable to identify the 3 different grouse species in the area.

**BACKGROUND:** Ruffed, sharp-tailed, and spruce grouse are present throughout all of Unit 20D. This proposal only addresses southwestern Unit 20D, which is the most easily accessed portion of the Unit.

Spring breeding surveys in this area have been completed for sharp-tailed grouse since 2000 and for ruffed grouse since 2008. These surveys provide annual estimates of relative abundance and allow managers to estimate population trends. Survey data from 2019 suggest that ruffed grouse are likely recovering from a low point in their 8–10 year population cycle, which was documented in 2018. Sharp-tailed grouse populations do not exhibit population cycles like ruffed grouse.

The department does not have specific data about the harvest rate on ruffed grouse in southwestern Unit 20D. Based on data collected in other areas of Alaska, we expect that harvest in this area is considerably higher than in areas that do not have extensive trail system like this portion of Unit 20D. Data collected by ADF&G on ptarmigan populations along frequently used, easily accessible hunting routes show considerable localized depletion within 2 miles of roadways. The same harvest and population patterns likely apply to grouse and other ptarmigan populations, such as in southwestern Unit 20D. Small game survey data collected by the department indicate the number of small game hunters has been increasing in the Delta area over the last 10 years.

The proponent has specifically expressed concerns about high ruffed grouse harvest but has asked for an overall grouse bag reduction to simplify regulations and to help minimize mistakes by hunters in the field. A daily bag limit that matches species limits removes the potential for accidentally exceeding a species limit by hunters who are not familiar with identifying the 3 grouse species found in the unit.

The portion of Unit 20D west of the east bank of the Johnson River and south of the north bank of the Tanana River is entirely within the Fairbanks Nonsubsistence Area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. The department has not identified any allocation issue and has no data to suggest there is a biological concern regarding the current grouse bag limits and seasons or with changes requested in this proposal. If adopted, this proposal represents a reduction in subsistence opportunity; as such the board may wish to consider whether reasonable opportunity would still be provided in Unit 20D for grouse.

**COST ANALYSIS:** Approval of this proposal is not expected to result in any additional direct costs for the department.

\*\*\*\*\*

**PROPOSAL 92 – 5 AAC 92.104 or 92.540(3)(ii). Authorization for methods and means disability exemptions.**

**PROPOSED BY:** Delta Junction Fish & Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** Specifically allow methods and means disability exemptions in the Delta Controlled Use Area (DCUA) for registration caribou hunt RC835 during August 5–25 for hunters who are permanently wheelchair bound or similarly disabled. This regulation would only apply to caribou hunting and would not affect any other big game hunting, or other non-hunting activities currently conducted inside of the DCUA.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.104. Authorization for methods and means disability exemptions**

(a) A person with a disability, or their personal representative, may submit an application on a form available from the department for an exemption from a methods and means requirement set out in this chapter. The application must

- (1) include a signed statement from a licensed physician explaining the nature and extent of the person's disability;
- (2) specifically identify the methods and means limitation at issue and the type of exemption requested;
- (3) include a statement by the person with a disability that explains the causal relationship between the disability and the requested accommodation, or how the regulation at issue prohibits meaningful access to a program, service or benefit; and



(4) be submitted at least 30 days before the requested effective date of the exemption, unless the exemption is being requested as a result of an emergency order or emergency regulation.

(b) The department shall issue a special authorization in writing that grants the requested exemption or an alternate exemption, if it determines that the exemption would provide a person with a disability with meaningful access to the program, service, or benefit in question, and meets the standard set out in this section. In granting the exemption, the department may include any conditions it determines are reasonable to conform the exemption to existing conservation and management objectives. In considering whether to grant the exemption, the department shall consider, among other factors, whether the exemption would

- (1) fundamentally alter a program, service or benefit of the department;
- (2) place an undue administrative burden or expense on the department;
- (3) have an unreasonable impact on the conservation, development, or utilization of game; or
- (4) constitute an unreasonable risk to public health or safety.

(c) The department may require a hunter or trapper who receives an exemption under this section to be accompanied by another hunter or trapper who has a valid hunting and trapping license and is capable of retrieving game.

(d) The department will not authorize an exemption under this section

- (1) if the regulation does not substantially prohibit the person from meaningful access to the program, service, or benefit;
- (2) that would allow exemption or modifications to seasons or bag limits; or
- (3) for any accommodation if the Board of Game has previously reviewed and acted on the same request.

(e) Notwithstanding any other provision in this title, the department may issue a permit to take brown bears with the use of bait during established seasons and with established bag limits to an applicant who qualifies for the hunt and meets the requirements of (a) and (b) of this section, and who is permanently wheelchair-bound or similarly disabled to the extent that use of bait is the only reasonable option the applicant has to harvest a brown bear.

**Delta Controlled Use Area** - beginning at the confluence of Miller Creek and the Delta River then west to Vertical Angle Benchmark (VABM) Miller, then west to include all drainages of Augustana Creek and Black Rapids Glacier, then north and east to include all drainages of McGinnis Creek to its confluence with the Delta River, then east in a straight line across the Delta River to the east bank of the Delta River, then north along the east bank to a point opposite the intersection of the Alaska and Richardson highways then east in a straight line to the intersection of the Alaska and Richardson highways, then east along the Alaska Highway, to the west bank of the Johnson River, then south along the west bank of the Johnson River and Johnson Glacier to the head of the Canwell Glacier, then west along the north bank of the Canwell Glacier, and Miller Creek to the Delta River. The area is **closed to any motorized**

vehicle or pack animal for big game hunting, including the transportation of big game hunters, their hunting gear, and/or parts of big game, Aug 5-25. However, this does not prohibit motorized access to the area for hunting, or transportation of game on the Richardson Highway, or the use of aircraft at the Charlie Boyd airstrip (63° 29'30" N. lat., 144° 50' 45" W. long.) along the Johnson River.

Open to	Unit/Area	Bag limit & Special Instructions	Open Season
Residents only	<i>Unit 20D south of the Tanana River &amp; east of Jarvis Creek (Macomb Herd)</i>	<p><b>One bull caribou</b> by permit available online or in person in Delta Junction, Tok, and Fairbanks beginning Aug 1</p> <ul style="list-style-type: none"> <li>• Harvest quota of 40–70 bulls (in combination with RC835 portion of Unit 12)</li> <li>• Only nonmotorized access during August 10–25 within the Delta Controlled Use Area.</li> <li>• Motorized access is allowed within the DCUA during August 26–27, if the harvest quota is not reached prior to these days.</li> <li>• The Macomb Plateau Controlled Use Area is restricted to nonmotorized access August 10–September 30.</li> <li>• The remainder of the hunt area within Unit 20D has no motorized restrictions.</li> </ul>	August 10–27. Closes by emergency order if harvest quota of ~70 bulls is reached.
Residents only	<i>Unit 12 west of the Glenn Highway (Tok Cutoff) &amp; south of the Alaska Hwy excluding the Tok River drainage (Macomb Herd)</i>	<p><b>One bull caribou</b> by permit available online or in person in Delta Junction, Tok, and Fairbanks beginning Aug 1</p> <ul style="list-style-type: none"> <li>• Harvest quota of 40–70 bulls (in combination with RC835 portion of Unit 20D)</li> <li>• There are no motorized restrictions within Unit 12.</li> </ul>	August 10–27. Closes by emergency order if harvest quota of ~70 bulls is reached.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would not allow the department to deny applicants who are otherwise qualified under (a) and (b) of 5 AAC 92.104, an exemption to participate in caribou hunt RC835 within the Delta Controlled Use Area (DCUA) based on a determination that motorized access on the last 2 days of the hunt provides meaningful access. Applicants who meet the proposed criteria would be able to use a motorized vehicle within the DCUA to hunt caribou during the non-motorized portion of the RC835 caribou hunt. Adoption of this proposal would not change management of the RC835 hunt. However, one form of disability or condition might be favored

over other qualifying disabilities listed on the ADF&G Methods and Means Exemption application form.

**BACKGROUND:** Methods and means exemption permit applications are evaluated by ADF&G on a case by case basis. If ADF&G determines reasonable opportunities exist for hunters to harvest an animal outside of a motorized-restricted area then the request may be denied. To determine this, staff assess the situation temporally and spatially by determining if a portion of the hunt area is outside of the controlled use area, or if the controlled use area is not in effect for the entire duration of the hunt. Staff from ADF&G review applications for completeness, including detailed information about which species, hunt numbers, area and exemption(s) are being requested. The applicant must explain and certify how their physical condition limits their ability to participate in the hunt without receiving an exemption. This statement is compared to the description provided by a licensed medical doctor, describing and certifying the nature and extent of the condition or disability. The medical doctor then indicates whether this is a permanent disability, ultimately determining the effective period of the exemption (Permanent Disability (Alaska resident) = 5 year exemption; non-permanent disability (Alaska resident) = calendar year; nonresident = calendar year), should it be approved.

ADF&G has had 1–2 requests per year for this permit. At the statewide level, since 2016 ADF&G has been denying applications for methods and means exemption permits requesting use of a motorized vehicle within a CUA if reasonable opportunity to harvest game during that hunt exists outside of the CUA. ADF&G began denying these permits in an attempt to treat all requests the same at a statewide level. Prior to 2016, ADF&G had not been denying applications requesting use of a motorized vehicle for hunts in this CUA.

At the beginning of RY16, ADF&G staff determined that if sufficient opportunity to take part in hunts such as RC835 exists outside of the CUA portion of the hunt, then no motorized vehicle exemption would be issued. Specific to the RC835 caribou hunt, a motorized vehicle may be used during the last two days of the hunt in the DCUA and a motorized vehicle may be used during the entire season in the eastern part of the hunt area outside of the DCUA and MPCUA. However, as the proponent suggested, the last 2 days of the hunt may not occur if harvest quotas are reached and the hunt is closed early by emergency order. Additionally, the last 2 days of this hunt are highly competitive among able-bodied hunters, which may reduce success for disabled persons. The proponent also cites the eastern side of the hunt area, outside of the DCUA, as not providing reasonable opportunity due to the lack of a developed trail system such as the one in the DCUA.

The department has recently denied this request for an exemption, citing existing opportunity to use motorized vehicles to hunt RC835 caribou either outside the DCUA or during the last 2 days of the hunt inside the DCUA. The same criteria have been applied to other methods and means exemption requests that request similar use of motorized vehicles in hunts that include a CUA within a portion of the hunt area.

Direction from the board is needed regarding how applications for methods and means exemptions are determined. Specifically, we request direction regarding determination of reasonable opportunity when a hunt is partially in a CUA that restricts motorized access. This would greatly assist the department in issuing permits effectively and consistently.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative issue and has no evidence to suggest there is a biological concern regarding the adoption of this proposal. However, the department asks that this proposal be deferred to the 2021 statewide meeting. This issue has implications statewide and therefore should be addressed at the statewide meeting so the language and criteria for this permit can be consistent across the state. The board needs to determine what constitutes as a qualifying disability. The department also intends to continue to evaluate each request on a case-by-case basis using consistent and standardized criteria for determining eligibility.

*Note: The Americans with Disabilities Act requires the State of Alaska to make reasonable modifications when the modifications are necessary to avoid discrimination on the basis of disability, unless the modification would fundamentally alter the nature of the program or activity.*

**COST ANALYSIS:** Approval of this proposal will not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 93 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Expand the area in Unit 20D where brown/grizzly bears can be taken over bait to include a portion of southern Unit 20D.

**PROPOSED BY:** Ryan Johnson

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow harvest of brown bear at bear bait stations in the portion of southern Unit 20D between the Gerstle and Robertson Rivers. This would align baiting for both brown bears and black bears in most portions of Unit 20D, during the April 15–June 30 bear baiting season.

**WHAT ARE THE CURRENT REGULATIONS?**

Resident and nonresident hunters: Unit 20D; one brown/grizzly bear every regulatory year, August 10–June 30. Cubs and sows with cubs may not be taken. Hunters must salvage the entire hide (including claws attached) and skull of a brown bear. Sealing brown bears is required within 30 days of harvest.

- Brown/grizzly bears are allowed to be taken over bait in Unit 20D north of the Tanana River during April 15–June 30
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

There is a positive customary and traditional use determination for brown/grizzly bears in Unit 20D outside of the Fairbanks Nonsubsistence Area with an amount necessary for subsistence (ANS) range of 1–2 bears.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would allow harvest of brown/grizzly bears over bait in the portion of southern Unit 20D between the Gerstle and Robertson Rivers. Brown/grizzly bears would also be allowed to be taken the same day the hunter is airborne. Adoption of this proposal will result in increased harvest. Increased harvest may result in exceeding the overall brown bear harvestable surplus and desired female bear take.

**BACKGROUND:** At the February 2017 Board of Game meeting the board heard several proposals to allow the take of brown bears over bait, and based on concerns for the population the board ultimately allowed the take of brown bears at bait stations in the northern portion only.

Additional harvest that could result from take of brown bears over bait in southeastern 20D likely would cause both the total harvest objective and target proportion of females in the harvest to be exceeded. The probability of increased harvest is high due to ease of access (extensive trails and roads) in the area coupled with a high density of black bear bait stations.

The Unit 20D brown bear harvest objective is 5–15 bears and is based on the estimated population of 185–220 total bears (including 143–167 bears  $\geq$ 2-years old). The average 10-year harvest is 11 bears per year (range = 3–18), although harvest has trended higher the past 2 years (RY17 and RY18) after baiting was implemented in northern Unit 20D.

The department estimates the recommended sustainable brown bear harvest in Unit 20D is no more than 15 brown bears per year, with no more than 45% females. Unit 20D brown bear harvest was 18 bears (including 5 over bait) in RY17 and 15 bears (6 over bait) in RY18. During RY09–RY18, females made up 47% of the total harvest, exceeding the recommended 45% maximum female harvest during half of those years.

Black bear baiting is popular in Unit 20D, with 75 black bear bait stations registered during RY18. Nearly 75% of Unit 20D bait stations are in southern Unit 20D where access is well-developed and most brown bear harvest already occurs.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because of biological concerns that this proposal would likely increase harvest beyond the current estimate of sustainable levels. Harvest is currently above management objectives for both total harvest and the female component of the harvest, therefore a conservative management approach is recommended.

**COST ANALYSIS:** Approval of this proposal is not expected to result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 94– 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

**PROPOSED BY:** Alaska Department of Fish & Game

**WHAT WOULD THE PROPOSAL DO?** Reauthorize antlerless moose hunting seasons in Unit 20D.

**WHAT ARE THE CURRENT REGULATIONS?** Unit 20D currently has antlerless hunts available by drawing permit only, with fewer than 40 permits available. Current antlerless moose (except a calf or a cow accompanied by a calf) seasons in Unit 20D are as follows:

- Bison Range Youth Moose Hunt (YM792): youth (ages 10 to 17) hunters that are residents or nonresident children of residents; one bull per lifetime, with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side, or one antlerless moose, however a calf or cow accompanied by a calf may not be taken; September 1–30.
- Purple Heart Recipient Hunt (DM795): qualified Purple Heart Recipient, resident and nonresident hunters; one moose every 4 years, however a calf or cow accompanied by a calf may not be taken; September 1–15 within the Delta Junction management Area.
- Southwestern Unit 20D drawing hunt (DM791) excluding the Delta Junction Management Area; resident hunters; one antlerless moose, however a calf or cow accompanied by a calf may not be taken; October 10–16.

In addition to these drawing hunts, registration hunts are retained in the codified regulation for the department to utilize in reducing or maintaining the moose population in some areas of southern Unit 20D by increasing antlerless harvest.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would allow the department to continue to provide the public with opportunity to sustainably harvest antlerless moose.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The goals of Unit 20D antlerless hunts are to make progress toward achieving the board’s intensive management (IM) harvest objective by harvesting cows from this highly productive population and to address concerns about range degradation, reduced nutritional conditions, and reduced reproductive success by slowing the moose population growth. It is important to manage this population for stability and a consistent harvestable surplus, rather than allow large population expansions and contractions, which can cause wide swings in the number of cow moose available for harvest.

These antlerless moose hunts will likely improve or maintain the ability of moose habitat to support the current moose population. Hunting opportunity and harvest could increase, and the additional harvest could contribute to meeting Intensive Management (IM) harvest objectives. Meat hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by having moose densities compatible with their habitat. Delta Junction residents and motorists may benefit from reduced moose–vehicle collisions and moose–human conflicts.

To maintain a healthy and productive moose population, department research (Boertje et al. 2007) indicates that 10-month-old calves should weigh at least 385 pounds and that the population should not be allowed to grow when the 2-year average twinning rate is 11–20%. Although the department confirmed in 2019 that 10-month-old calves exceeded the minimum weight, the 2-year twinning rate of 11% may be an indication this population is showing signs of nutritional stress. The department will continue to monitor these, and other, density-dependent indices of nutritional condition.

The department intends to adjust the number of antlerless moose permits needed to maintain a healthy moose population in Unit 20D and expects to issue 20–75 drawing permits for antlerless

moose in RY20. During RY16–RY18 an average of 29 drawing permits were issued in Unit 20D for which the bag limit included antlerless moose, with an average harvest of 17 females. Registration permits will only be issued in specific areas if additional harvest is necessary to maintain optimal moose densities.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal and has no biological concerns regarding continued antlerless hunts. However, the department does have biological concerns regarding habitat degradation, reduced nutritional condition, and reduced reproductive success if antlerless hunts are eliminated. The Unit 20D moose population has great potential for growth due to the extensive agricultural land, wildland fire footprints, and high predator harvest. If antlerless moose hunts are not reauthorized, the moose population may quickly exceed carrying capacity. These hunts maintain the opportunity to hunt a harvestable surplus of cow moose and help to meet IM harvest objectives.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 95 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish a registration winter moose hunt for resident hunters in Unit 19D East.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would establish a resident registration moose hunt during Feb 1 – 28 in Unit 19D East. The bag limit would be any moose except cows with calves with a quota established by the department. The permits would be available in the hunt area from January 1 through the end of the season and aircraft would only be permitted between publicly owned airports including McGrath, Takotna, Medfra, Nikolai and Telida.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 19D, Resident hunters only:

- One antlered bull
- Sept 1–25
- Registration permit (RM650)

Unit 19D outside the Upper Kuskokwim Controlled Use Area: Resident hunters only:

- One antlered bull
- Sept 1–20
- Harvest ticket

The Board has made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A and 20–24 in Unit 19B. The Board has also made a separate positive C&T finding for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–

40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted a winter moose season open to residents only would be established during Feb 1–28 in Unit 19D East, which would provide additional subsistence opportunity in Unit 19D East for resident hunters. In addition, an antlerless moose hunt in this area has potential to provide additional harvest opportunity, and make progress toward meeting IM harvest objectives, stabilize or slow growth of this population which may be reaching carrying capacity, and improve bull-to-cow ratios.

**BACKGROUND:** The moose population in Unit 19D East has approximately doubled since predator removals began. The department is starting to observe decreasing nutritional status as indicated by declining twinning rates. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. By 2017 ratios had declined again and were at 15 bulls per 100 cows.

Intensive management for moose began in Unit 19D East in 2003. Research designed to assess changes in the moose population began in 2001. Between 2001 and 2017, moose densities increased from 1.0 to 1.9 moose per  $\text{mi}^2$  in a 528  $\text{mi}^2$  area surrounding McGrath known as the BCFA. In the larger 19D East Moose Survey Area (5,313  $\text{mi}^2$ ), the population increased from 0.5 to 1.1 moose per  $\text{mi}^2$  in the same time period.

Twinning rates are a strong indicator of the nutritional status of a moose population and as the population has grown in 19D East, the twinning rates observed during spring surveys have declined. At the same time, bull to cow ratios have been declining and most of the growth in the population has been cows. To maintain a healthy and productive moose population, department research (Boertje et al. 2007) indicates that when the 2-year average twinning rate is 11–20% populations should be stabilized. Twinning rates in Unit 19D East remained high until 2015; however, the current 2-year average twinning rate is now 16%, indicating a decreasing nutritional status in this population. The current Intensive Management plan calls for to stabilization of the population through harvest when the 2-year average twinning rate is between 15 and 20%. The department will continue to monitor this, and other, density-dependent indices of nutritional condition.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** opening a hunt that includes cow harvest to stabilize moose densities, provide additional harvest opportunity, and make progress toward meeting IM harvest objectives. However, the department is **NEUTRAL** on the allocative aspects of this proposal. The additional harvest that is available within the BCFA is primarily cows, which will both maintain bull-to-cow ratios and stabilize the population.

If this proposal passes the number of antlerless moose permits will be adjusted to maintain a healthy moose population in Unit 19D East. In RY20, a limited harvest of antlerless moose can be expected by issuing 20–50 registration permits or issuing an Emergency Order to close the hunt when the harvest quota for antlerless moose is reached. If the proposal passes the department will also ask the board to specify when and where permits are available, and the extent of the aircraft restriction requested.



**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 96 – 5 AAC 92.123(a)(2). Intensive Management Plans VII.** Reauthorize the Unit 19D East Intensive Management plan.

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the Unit 19D East Intensive Management (IM) plan.

**WHAT ARE THE CURRENT REGULATIONS?** Under the Unit 19D East IM Plan, the board authorized the department to reduce black bears and brown bears within the Bear Control Focus Areas (BCFA) and wolves within the Wolf Control Focus Area (WCFA). Public aerial wolf control permits are issued within the WCFA and control efforts are designed to benefit moose. The Unit 19D East IM Plan will expire on June 30, 2020.

The IM population and harvest objectives for Unit 19D East are 6,000–8,000 moose with a harvest of 400–600.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would authorize black bear, brown bear, and wolf reductions to meet moose population and harvest objectives. It establishes a 528 mi<sup>2</sup> BCFA and a 5,579 mi<sup>2</sup> WCFA. The board would be authorizing only the department to conduct bear control in the BCFA. Public aerial wolf control permits would continue to be issued within the WCFA with the option for department-conducted wolf control. The program would be reauthorized for 6 years during July 1, 2020–June 30, 2026. Population and harvest objectives for moose are established within the WCFA.

**BACKGROUND:** To remedy low moose numbers and harvest, the Board adopted a wolf predation control plan in Unit 19D East beginning in the fall of 1995; however, bear and wolf control did not begin until 2003. The department relocated bears during May 2003 and 2004, and successfully reduced black bears by 96% and grizzly bears by an estimated 50%. The Department issued public bear control permits beginning in RY06 including the use of bucket snares from May 2010 through June 30, 2014. However, success was limited and public bear control was not reauthorized during the current plan (RY14–RY19). Wolf control by the public began in RY03 and permittees have successfully reduced wolves within the WCFA by at least 60% since aerial control began.

The IM population objective of 6,000–8,000 moose has been achieved; however, the IM harvest objective has not. Within the WCFA where wolf and bear control have been conducted, point estimates of moose numbers increased from 2,564 (0.5 moose/mi<sup>2</sup>) in fall 2001 to 5,884 (1.1 moose/mi<sup>2</sup>) in fall 2017. Harvest over the last 5 years within the WCFA has averaged approximately 125 moose, which is well below the IM harvest objective.

The department will also provide additional details for public review in a separate IM operational plan prior to the March 2020 board meeting.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Although the IM moose population objective within Unit 19D East has been reached, moose harvest objectives have not been met. A typographical error appeared in the original proposal, in which paragraph (c) should correctly read “the Unit 19(D) East Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage, [AND] **but excluding** the Black River drainage,”

**COST ANALYSIS:** Adoption of this proposal is expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 97 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change Tier II moose permit TM680 to a registration permit.

**PROPOSED BY:** Bethel Fish and Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** This proposal would replace the current Tier II moose hunt TM680 with a registration permit hunt, and requests the registration hunt be available only in Units 18 and 19. The season dates and bag limit would remain the same, but the number of permits would not be limited to 300 as with the current Tier II hunt. Permits would be issued in Units 18 and 19 before the hunt, but specific locations are not specified.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 19A, that portion of the Kuskokwim River drainage downstream from and including the George River drainage and downstream from and excluding the Downey Creek drainage:

Resident hunters only

- One antlered bull
- Sept 1–20
- Tier II permit, one per household
- Up to 300 permits may be issued

The board made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, the hunt area in Unit 19A downstream from and including the George River drainage and downstream from and excluding Downey Creek drainage would change from a Tier II permit to a registration permit, available to all Alaskans, and harvest would likely increase by a significant amount.

**BACKGROUND:** Currently, the maximum sustainable number of animals is being harvested from this population. Because of concerns of declining moose numbers available for harvest in Unit 19A, the board implemented a Tier II hunt in western Unit 19A and closed the eastern half of Unit 19A (excluding the Lime Village Management Area [LVMA]) to all moose hunting in 2006. Since RY06 the department has issued 200 Tier II permits annually with only 1 available

per household. The U.S. Fish and Wildlife Service, through the Yukon-Kuskokwim Wildlife Refuge, issues 100 permits. Harvest in both RY17 and RY18 was approximately 160 moose per year (including federal harvest and mortality moose) and there were 26 bulls per 100 cows observed in November 2018. During the most recent Geospatial Population Estimator (GSPE) survey in 2017 the department observed 6,300 moose and determined the harvestable surplus in 19A outside of the LVMA to be 240. The ANS for Unit 19A outside the LVMA is 175–225 and the harvestable surplus is now above the upper end of the ANS range. Within the TM680 hunt area the department estimated 4,135 moose and the harvestable surplus is 165 moose. Harvest within the TM680 area is currently very close to the harvestable surplus.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding changing TM680 to a registration permit because this is an allocation issue. The department is **OPPOSED** to the proposal as written because hunters are currently harvesting the maximum number of animals available, and if this proposal is adopted as written, harvest would likely increase significantly. The department currently issues 200 permits while the U.S. Fish and Wildlife Service issue an additional 100 permits. Currently with 300 total permits issued and success rates just above 50% there is no additional harvest available. Therefore, if the board decides to make the change from a Tier II hunt to a registration permit, ensuring harvest does not increase will be essential. Changes to seasons and bag limits may need to be considered, or other options, such as limiting the number of registration permits issued, allowing only one permit per household, only being able to hold one registration permit in the Kuskokwim River drainage, or a very short reporting requirement. The department will need clear guidance regarding how widely permits will be available and the time frame to issue them.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 98 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change TM680 to a registration permit.

**PROPOSED BY:** Sam Hancock.

**WHAT WOULD THE PROPOSAL DO?** This proposal would replace the current Tier II moose hunt TM680 with a registration permit hunt available only in Units 18 and 19. The season dates and bag limit would remain the same, but the number of permits would not be limited to 300 as with the current tier II hunt. Permits would be issued in Units 18 and 19 before the hunt, but specific locations are not specified.

**WHAT ARE THE CURRENT REGULATIONS?**

Residents 19A: Kuskokwim River drainage downstream from and including the George River and downstream from and excluding Downey Creek:

- One antlered bull
- Sept 1–20
- Tier II permit
- Up to 300 permits may be issued

The board made a positive customary and traditional use (C&T) finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an amount reasonably necessary for subsistence (ANS) of 400–700 moose, including 175–225 in Unit 19A. The board has also found a separate positive C&T use for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted 19A downstream from and including the George River and downstream from and excluding Downey Creek would change from a tier II permit to a registration permit, available to all Alaskans, and harvest would likely increase by a significant amount.

**BACKGROUND:** Currently, the maximum sustainable number of animals are being harvested from this population. Because of concerns of declining moose numbers in Unit 19A, the board implemented a Tier II hunt in western Unit 19A and closed the eastern half of Unit 19A (excluding the Lime Village Management Area [LVMA]) to all moose hunting in 2006. Since RY06 the department has issued 200 tier II permits annually with only 1 available per household. The U.S. Fish and Wildlife Service, through the Yukon-Kuskokwim Wildlife Refuge, issues 100 permits. Harvest in both RY17 and RY18 was approximately 160 moose per year (including federal harvest and mortuary moose) and there were 26 bulls per 100 cows observed in November 2018. During the most recent Geospatial Population Estimator (GSPE) survey in 2017 the department observed 6,300 moose and determined the harvestable surplus in 19A outside of the LVMA to be 240. The ANS for Unit 19A outside the LVMA is 175–225 and the harvestable surplus is now above the upper end of the ANS range. Within the TM680 hunt area the department estimated 4,135 moose and the harvestable surplus is 165 moose. Harvest within the TM680 area is currently very close to the harvestable surplus.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding changing TM680 to a registration permit because this is an allocation issue. The department is **OPPOSED** to the proposal as written because hunters are currently harvesting the maximum number of animals available, and if this proposal is adopted as written, harvest would likely increase significantly. The department currently issues 200 permits while the U.S. Fish and Wildlife Service issue an additional 100 permits. Currently with 300 total permits issued and success rates just above 50% there is no additional harvest available. Therefore, if the board decides to make the change from a Tier II hunt to a registration permit, ensuring harvest does not increase will be essential. Changes to seasons and bag limits may need to be considered, or other options, such as limiting the number of registration permits issued, allowing only one permit per household, only being able to hold one registration permit in the Kuskokwim River drainage, or a very short reporting requirement. The department will need clear guidance regarding how widely permits will be available and the time frame to issue them.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 99 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Change the Tier II permit TM680 from an individual permit for 1 moose to a household permit for 1 moose.

**PROPOSED BY:** Central Kuskokwim Fish and Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** This proposal would modify the TM680 permit from an individual permit to a household permit.

**WHAT ARE THE CURRENT REGULATIONS?** Unit 19A, that portion of the Kuskokwim River drainage downstream from and including the George River drainage and downstream from and excluding the Downey Creek drainage:

Residents only

- One antlered bull
- Sept 1–20
- Tier II permit (TM680)

The board has made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted the permit would become a household permit and any member of the household listed on the permit would be able to hunt. Currently the TM680 permit is an individual permit and only 1 permit may be issued per household. Adoption of this proposal would provide additional opportunity for subsistence hunters, particularly younger hunters and other household members who may not demonstrate a sufficient score under the current individual Tier II permit application process to be awarded a TM680 hunting permit.

**BACKGROUND:** Currently, the maximum sustainable number of animals is being harvested from this population. Because of concerns of declining moose harvestable surplus numbers in Unit 19A, the board implemented a Tier II hunt in western Unit 19A and closed the eastern half of Unit 19A (excluding the Lime Village Management Area [LVMA]) to all moose hunting in 2006. Since RY06 the department has issued 200 Tier II permits annually with only 1 available per household; the U.S. Fish and Wildlife Service Yukon-Kuskokwim Wildlife Refuge issues 100 permits. Harvest in both RY17 and RY18 was approximately 160 moose per year (including federal harvest and mortuary moose) and there were 26 bulls per 100 cows observed in November 2018. During the most recent Geospatial Population Estimator (GSPE) survey in 2017 the department observed 6,300 moose and determined the harvestable surplus in 19A outside of the LVMA to be 240. The ANS for Unit 19A outside the LVMA is 175–225 and the harvestable surplus is now above the upper end of the ANS range. Within the TM680 hunt area the department estimated 4,135 moose and the harvestable surplus is 165 moose. Harvest within the TM680 area is currently very close to the harvestable surplus.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal, since it is an allocation issue. Harvest is steady at the maximum number of animals available, but it is unlikely this proposal would change harvest rates. The department has been authorized by the board to issue up to 300 TM680 permits per year and if harvest increased, the number of permits could be adjusted. The board may wish to explore this idea on a statewide basis, as a means of

providing additional opportunity.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 100 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Extend the Unit 19A Remainder moose season from September 1–5 to September 1–30.

**PROPOSED BY:** Sam Hancock.

**WHAT WOULD THE PROPOSAL DO?** Extend the 19A remainder moose season from September 1–5 to September 1–30.

**WHAT ARE THE CURRENT REGULATIONS?**

Residents only, Unit 19A remainder:

- Bag limit of one antlered bull
- Season September 1–5
- Registration permit (RM682)
  - available in person in Sleetmute and Stony River during month of July
  - only one permit per household
  - may not hold any other moose hunting permits on the Kuskokwim River
  - proxy hunting is not allowed
  - reporting required by Sept. 20
- The department may issue up to 75 permits each regulatory year with 30 permits issued in the first year.
- If the 2-year average bull-to-cow ratio drops below 35 bulls per 100 cows, the area will close until the 2-year average is above 35 bulls per 100 cows.
- If the harvestable portion of the population drops below the lower range of the ANS, the hunt will close until the harvestable portion reaches the minimum ANS.
- Holitna–Hoholitna Controlled Use Area: The area is closed to the use of any boat equipped with inboard or outboard motor(s) with an aggregate horsepower in excess of manufactures rating of 40 h.p. for taking big game, including transportation of big game hunters, their gear, and or parts of big game during Aug. 1–Nov. 1.

The board has made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A. The board has also found a separate positive C&T use for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, the moose season in Unit 19A Remainder would be open during September 1–30, adding 25 days to the season. This would likely result in a significant increase in harvest, which would hamper efforts to increase moose abundance in the area.

**BACKGROUND:** Because of declining moose numbers, the board in 2006 implemented a Tier II hunt in western Unit 19A and closed the eastern half of the unit (19A remainder) to all moose

hunting. Based on department survey data, the board had determined there was no harvestable surplus in this area. Unit 19A Remainder was closed to moose hunting for 13 years until the board reopened a 5-day season at their March meeting in 2019. While moose numbers have not increased substantially, the board determined there was opportunity available and there was a hunting season in September 2019 for the first time since 2005. Thirty permits were issued this year and 8 bulls were harvested.

The board implemented RM682 restrictions to limit harvest in order to prevent another decline in this population, while allowing hunting opportunity that has not been available for 13 years. Further extending the season will not allow us to fully assess the department's extended efforts in recovering this population. We would like several years of survey and harvest data under the new Sept 1–5 season to evaluate trends in population and bull to cow ratios before increasing harvest.

During the most recent moose survey of Unit 19A in 2017 the department estimated 6,300 moose and determined the harvestable surplus outside of the LVMA to be 240 moose. The current estimate for 19A Remainder is 1,932 and the harvestable surplus is 77 moose. However, most of the harvest is likely to take place within a much smaller area along the Holitna and Hoholitna rivers where the harvestable surplus is only 29 moose.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal. Adding 25 days of hunting would increase success rates dramatically. Restrictions put in place by the board to limit harvest were deliberate since the intent was to open this hunt in a very conservative fashion to prevent another decline in the population.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 101 – 5 AAC 92.540(7)(B). Controlled use areas.** Eliminate horsepower restrictions in the Unit 19A Holitna-Hoholitna Controlled Use Area.

**PROPOSED BY:** Sam Hancock.

**WHAT WOULD THE PROPOSAL DO?** Eliminate the Holitna–Hoholitna Controlled Use Area (HCUA) in Unit 19A.

**WHAT ARE THE CURRENT REGULATIONS?** The HCUA in Units 19A and 19B consists of the Holitna River downstream from Kasheglok, the Titnuk Creek downstream from Fuller Mountain and the Holitna River downstream from the confluence of the South Fork and the main Holitna River. The area is closed to the use of any boat equipped with inboard or outboard motor(s) with an aggregate horsepower in excess of 40 horsepower for taking big game, including transportation of big game hunters, their gear, and/or parts of big game from Aug 1 through Nov 1.

The board has made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A, and 20–24 in Unit 19B. The board has also made a separate positive C&T

finding for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, the HCUA would be eliminated and big game hunters would be permitted to use any boat motor configuration regardless of horsepower rating. Adoption of this proposal would result in user conflict in the area.

**BACKGROUND:** Moose hunting was reestablished in this area after a 13-year closure (RY06–RY18). If the HCUA were eliminated, the historical user conflicts for which the CUA was created to address would likely return. The board established the HCUA in 1992 to restrict access to smaller boats as a way of reducing conflicts among hunters in the drainage.

In 2002 the department formed the Central Kuskokwim Moose Management Planning Committee (CKMC), a diverse group of individuals representing resident subsistence hunters; area state fish and game advisory committees; state, federal, and tribal agencies; big game guides and transporters; and conservation organizations. One of the primary objectives of the CKMC was to review biological and harvest information of moose in Units 19A and 19B to restore and maintain area moose populations that would ensure reasonable subsistence opportunities and provide for high levels of human consumptive uses. The CKMC’s recommendations guided the department’s development of the Central Kuskokwim Moose Management Plan (CKMMP), which was written to address these concerns over the moose population in Units 19A and 19B. The existence of the HCUA is one of the key regulations recommended by the CKMC. Proposals to eliminate the HCUA were submitted to the board in 1994, 2008, and 2017, but all these proposals failed because the board recognized the continued importance of the HCUA.

Beginning in RY19 there was a 5-day resident hunting season under registration permit RM682. This was the first moose hunt in 19A remainder since 2005 and the HCUA was an important tool in reducing user conflicts.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it is a methods and means issue. The board recently established a conservative registration permit hunt (RM682) in RY19, which includes continuation of the 40 horsepower restriction within the HCUA. Additionally, with moose hunting reestablished after a 13-year closure (RY05–RY18), the historical user conflicts for which the HCUA was created to address would likely return if it were eliminated. Therefore, the department recommends the board proceed cautiously in implementing any changes that could affect the moose harvest rate in this area.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 102 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Shift the season dates for Tier II moose hunt TM680 from September 1–20 to September 5–25.

**PROPOSED BY:** Gregory Thomas Hoffman Sr.



**WHAT WOULD THE PROPOSAL DO?** Shift the season dates for the Tier II moose hunt TM680 from September 1–20 to September 5–25.

**WHAT ARE THE CURRENT REGULATIONS?** The current moose season for resident hunters in Unit 19A, in the Kuskokwim River drainage downstream from and including the George River and downstream from and excluding Downey Creek, is Sept. 1–20, with a bag limit of one antlered bull, by Tier II permit (TM680) only. The department may issue up to 300 permits. There is no nonresident season.

The board made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A. The board has also made a separate positive C&T finding for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, the TM680 moose season in Unit 19A would shift from September 1–20 (20 days) to September 5–25 (21 days), as a result, an increase in harvest can be expected due to rutting behavior of bulls.

**BACKGROUND:** Currently, the maximum sustainable number of animals are being harvested from this population. Because of concerns of declining moose numbers in Unit 19A, the board implemented a Tier II hunt in western Unit 19A and closed the eastern half of Unit 19A (excluding the LVMA) to all moose hunting in 2006. Since RY06 the department has issued 200 Tier II permits annually with only 1 available per household. Harvest in both RY17 and RY18 was approximately 160 moose per year (including federal harvest and ceremonial moose).

The 2-year average bull-to-cow ratio is 23 bulls per 100 cows, which is below our objective of 30 bulls per 100 cows. A composition survey in November 2018 resulted in a bull-to-cow ratio of 26 bulls per 100 cows, which remains below the management objective.

Harvest within the TM680 area is currently very close to the harvestable surplus. During the most recent Geospatial Population Estimator (GSPE) survey in 2017 the department observed 6,300 moose and determined the harvestable surplus in 19A outside of the LVMA to be 240. The ANS for Unit 19A outside the LVMA is 175–225 and the harvestable surplus is now above the upper end of the ANS range. Within the TM680 hunt area the department estimated 4,135 moose and the harvestable surplus is 165 moose.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** to shifting the season dates for TM680 in Unit 19A, however, the number of permits issued may be decreased to adjust for any additional harvest because the bull:cow ratios are below the management objective and we are very close to the maximum harvestable surplus for the area. This shift in season dates would not only add a day of hunting opportunity but would also likely increase harvest because bulls become more susceptible to harvest as the rut approaches in late September.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 103 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Transition to Tier II for moose seasons in Unit 19A remainder if the harvestable surplus falls below the amount reasonably necessary for subsistence (ANS).

**PROPOSED BY:** Sam Hancock

**WHAT WOULD THE PROPOSAL DO?** If the harvestable surplus in Unit 19A Remainder were to fall below the ANS, this proposal would require establishment of a Tier II hunt.

**WHAT ARE THE CURRENT REGULATIONS?** The current hunt is administered under a mix of codified regulations and board findings that instruct the department to use discretionary authority to implement the hunt in a certain manner.

Residents only, Unit 19A remainder:

- Bag limit of one antlered bull
- Season September 1–5
- Registration permit (RM682)
  - available in person in Sleetmute and Stony River during month of July
  - only one permit per household
  - may not hold any other moose hunting permits on the Kuskokwim River
  - proxy hunting is not allowed
  - reporting required by September 20
- The department may issue up to 75 permits each regulatory year with 30 permits issued in year one.
- If the two year average bull-to-cow ratio drops below 35 bulls per 100 cows the area will close until the 2 year average is above 35 bulls per 100 cows again.
- If the harvestable portion of the population drops below the lower range of the ANS, the hunt will close until the harvestable portion reaches the minimum ANS.
- Holitna-Hoholitna Controlled Use Area: The area is closed to the use of any boat equipped with inboard or outboard motor(s) with an aggregate horsepower in excess of manufactures rating of 40 h.p. for taking big game, including transportation of big game hunters, their gear, and or parts of big game from August 1–November 1.

The board has made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A. The board has also made a separate positive C&T finding for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, moose hunting in Unit 19A Remainder would continue under a Tier II program if the harvestable surplus for moose falls below the ANS, rather than returning to a closure.

**BACKGROUND:** Because of declining moose numbers, the board in 2006 implemented a Tier II hunt in western Unit 19A and closed the eastern half of the unit (19A remainder) to all moose

hunting. Based on department survey data, the board determined there was no harvestable surplus in this area at that time.

Unit 19A Remainder was closed to moose hunting for 13 years until the board opened a 5-day season at their March meeting in 2019. The board implemented RM682 restrictions in regulation and as instruction to the department under discretionary permit authority to limit harvest in order to prevent another decline in this population while providing hunting opportunity. While moose numbers have not increased substantially, the board determined there was opportunity available and there was a hunting season in September 2019 for the first time since 2005. Thirty permits were issued this year and 8 bulls were harvested.

During the most recent moose survey of Unit 19A (2017) the department estimated 6,300 moose and determined the harvestable surplus outside of the LVMA to be 240 moose. This is above the upper end of the ANS, which is 175–225.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on whether moose hunting in 19A remainder is conducted with a registration permit or a Tier II permit because it is an allocation issue. Currently the harvestable surplus for moose is above the upper end of the range of the ANS. Board findings (2019-225-BOG) state the area will return to a closure if the harvestable surplus drops below the lower range of the ANS. Therefore, if this proposal were to pass, the board may need to amend their findings to authorize a Tier II hunt.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 104 – 5AAC 92.123(a)(1). Intensive Management Plans VII.** Reauthorize the Unit 19A intensive management plan.

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the Unit 19A Intensive Management Plan.

**WHAT ARE THE CURRENT REGULATIONS?** Under the Unit 19A Intensive Management (IM) Plan, the department is authorized to reduce black bears and brown bears within the Bear Control Focus Area (BCFA) and wolves within the Wolf Control Focus Area (WCFA). Public aerial wolf control permits are issued within the WCFA and control efforts are designed to benefit moose. The Unit 19A IM Plan will expire on June 30, 2020.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would authorize black bear, brown bear, and wolf reductions to meet moose population and harvest objectives. It establishes a 534 mi<sup>2</sup> BCFA and a 3,905 mi<sup>2</sup> WCFA. If bear control were conducted it would be by the department only. Public aerial wolf control permits would continue to be issued within the WCFA with the option for department-conducted wolf control as well. The program would be reauthorized for 6 years from July 1, 2020–June 30, 2026. Population and harvest objectives for moose are established within the WCFA. Reauthorization

of this plan will increase the likelihood that the department will achieve the moose population and harvest objectives established by the plan.

**BACKGROUND:** Beginning in 2004, the board adopted a wolf predation control plan in Unit 19A to address low moose numbers and low harvest. In 2009, when the IM plan was reauthorized, predator removals were focused in the eastern half of 19A only, in an area upstream of Sleetmute in the Kuskokwim River drainage. By 2012 moose densities had not increased. In response, the board approved bear control in the area. The department conducted bear control in 2013 and 2014 to simulate the success seen in the McGrath area. Moose densities have been slow to respond to these treatments; however, some improvements are now being documented in the moose population. Based partly upon increased moose density in eastern 19A, the Board adopted a proposal to open a registration permit moose hunt in RY19, the first opportunity to hunt moose in eastern 19A since RY05.

The IM population objective that the Board established for Units 19A and 19B is 13,500–16,500 moose. Based on the relative sizes of the two units, the proportional population objective for Unit 19A alone is 7,600–9,300 moose. The IM moose harvest objective for Units 19A and 19B is 750–950 moose annually while the proportional harvest objective for Unit 19A alone is 400–550 moose annually. The population and harvest objectives have not been met. The current 19A moose population is 6,300 and current harvest is approximately 160 moose per year.

Additional details will also be made available for public review in a separate IM operational plan prior to the board meeting.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Moose population and harvest objectives within the WCFA have not been achieved. Moose densities have increased slightly and calf survival improved after bear removals in 2013 and 2014. Additionally, hunting was reopened in RY19 for the first time in 13 years in the Unit 19A remainder area. Reauthorization of this plan will increase the likelihood that the department will achieve the moose population and harvest objectives established by the plan.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 105 – 5 AAC 92.123(a)(1). Intensive Management Plans VII.** Open predation control in all of Unit 19A.

**PROPOSED BY:** Central Kuskokwim Fish and Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** Open all of Unit 19A to predation control.

**WHAT ARE THE CURRENT REGULATIONS?** Unit 19A has a positive finding for Intensive Management (IM). Under the Unit 19A Intensive Management (IM) Plan, the department is authorized to reduce black bears and brown bears within the Bear Control Focus Areas (BCFA; 534 mi<sup>2</sup>) and wolves within the Wolf Control Focus Area (WCFA; 3,995 mi<sup>2</sup>). Both of these areas are in the eastern portion of the unit only.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would authorize black bear, brown bear, and wolf reductions in all of Unit 19A. Authorization of predation control throughout all of Unit 19A may help the department to achieve the moose population and harvest objectives established by the plan. However, the board may wish to consider whether poor conditions and land access issues would limit predation control effectiveness, especially in western Unit 19A.

**BACKGROUND:** To address low moose numbers and harvest, the Board of Game adopted a wolf predation control plan (public permittees only) in Unit 19A which began in 2004. At the time, seasons and bag limits for moose were becoming more restrictive. By 2006, western 19A (downstream of and including the George River drainage) transitioned to a Tier II hunt and eastern 19A (upstream of the George River drainage) was closed except for the Lime Village Management Area. In 2009, when the IM plan was reauthorized by the board, predator removals were only authorized in the eastern half of Unit 19A. The take of wolves by the public in western 19A had been extremely low due to access issues caused by land status and weather conditions. As a result, wolf predation control in this area was determined to be ineffective. Since 2009, predator removals have only been authorized in eastern 19A. From 2010 to 2017, the moose density has approximately doubled in western 19A (i.e., 0.3 to 0.7 moose/mi<sup>2</sup>). In the area around Aniak, moose population density increased from 0.4 to 1.3 moose/mi<sup>2</sup> over the same period. However, harvest is still limited and managed by a Tier II hunt structure with only one permit available per household.

The IM population objective established by the board for Units 19A and 19B is 13,500–16,500 moose. Based on the relative sizes of the 2 units, the proportional population objective for Unit 19A alone is 7,600–9,300 moose. The IM moose harvest objective for Units 19A and 19B is 750–950 moose annually while the proportional harvest objective for Unit 19A alone is 400–550 moose annually. The population and harvest objectives for 19A have not been met. The current 19A moose population is 6,300 animals. Current harvest is approximately 160 moose per year, and is near the maximum sustainable harvest. There is a high demand for moose meat in the area. During 2004 and 2005, with a registration permit in the unit, over 1,000 permits were issued annually. Currently we issue only 200 permits in western Unit 19A and 30 in eastern Unit 19A.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because of uncertainties about how effective a program in this area would be. Predator removals were ineffective from 2004 to 2009, in part due to poor snow conditions that limited pilot effectiveness. Additionally, restrictions to predation control activities on private and federal lands limited the success of this program. In general, because of the remoteness and difficult logistics, few pilots are available in Unit 19A. This is limiting the existing program’s effectiveness in the eastern portion of Unit 19A and few wolves have been taken in recent years. Therefore, if the board adopts this proposal the department recommends maintaining separate control areas in the eastern and western portions of the unit due to a lack of certainty in the future success of the program.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 106** – 5 AAC 92.123(a)(1). **Intensive Management Plans VII.** Expand the bear control area in Unit 19A.

**PROPOSED BY:** Stony–Holitna Fish and Game Advisory Committee (SHAC).

**WHAT WOULD THE PROPOSAL DO?** Expand the bear control area in Unit 19A.

**WHAT ARE THE CURRENT REGULATIONS?** Under the Unit 19A Intensive Management (IM) Plan, the department is authorized to reduce black bears and brown bears within the 534 mi<sup>2</sup> Bear Control Focus Area (BCFA) with the discretion to adjust the size and shape up to approximately 800 mi<sup>2</sup>. Public aerial wolf control permits are issued within the Wolf Control Focus Area (WCFA) and control efforts are designed to benefit moose.

The IM population objective established by the Board for Units 19A and 19B is 13,500–16,500 moose. Based on the relative sizes of the two units, the proportional population objective for Unit 19A alone is 7,600–9,300 moose. The IM moose harvest objective for Units 19A and 19B is 750–950 moose annually while the proportional harvest objective for Unit 19A alone is 400–550 moose annually.

The ANS for Unit 19 is 30-40 moose in the LVMA and 400–700 in Unit 19 outside the LVMA, including 175–225 in Unit 19A and 20–24 in Unit 19B.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would authorize department-conducted black bear and brown bear removals within the 870 mi<sup>2</sup> Lime Village Management Area (LVMA). The department has the authority to increase the control area to 800 mi<sup>2</sup>. It is unclear if increasing bear control efforts will have a positive effect on area moose populations.

**BACKGROUND:** The IM population and harvest objectives have not been met in this area. Moose densities in the LVMA are extremely low and moose habitat is limited. However, an improvement in calf survival might help improve moose densities. The current Unit 19A moose population is 6,300 and current harvest is approximately 160 moose per year.

To remedy low moose numbers and harvest, the Board of Game adopted a wolf predation control plan in Unit 19A which began in 2004. In 2009, when the IM plan was reauthorized, predator removals were focused in the eastern half of 19A only, in an area generally upstream of Sleetmute. By 2012, moose densities still had not increased and the board authorized bear control which the department conducted in 2013 and 2014. The McGrath control effort had strong local support and residents of Lime Village are hopeful bear control could be conducted in their area as well. The LVMA has a very low density moose population (0.3 moose/mi<sup>2</sup>) and currently has a Tier II hunt with only 7 people awarded permits annually (bag limit is 2 bulls, so 2 permits are issued to the permittees). The LVMA is entirely within the 19A WCFA which has had ongoing wolf control since 2004. None of the LVMA is within the current BCFA.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is unclear if the efforts would produce any measurable results. The densities of moose in the LVMA are extremely low and habitat is limited to a narrow band of riparian habitat. While population and harvest objectives within the WCFA and LVMA have not been met, an improvement in calf

survival, such as was seen in the McGrath area and the Holitna, may help improve moose densities.

**COST ANALYSIS:** Adoption of this proposal will result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 107 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish a registration winter moose hunt in Unit 21E for resident hunters.

**PROPOSED BY:** Grayling, Anvik, Shageluk, Holy Cross (GASH) Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would establish a winter moose registration season for resident hunters during February 15–March 15. The bag limit would be any moose except cows with calves and a quota would be established by the department. The permits would be available in the hunt area and online. Aircraft use would remain restricted within the Paradise Controlled Use Area.

**WHAT ARE THE CURRENT REGULATIONS?**

**Unit 21E:**

Residents

- One antlered bull
- September 1–25
- Registration permit

Nonresidents Unit 21E:

- One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side
- September 5–25
- Drawing permit

**Paradise Controlled Use Area (PCUA)** is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, and/or parts of moose; however, this does not apply to the transportation of moose hunters, their hunting gear, and/or parts of moose by aircraft between publicly owned airports within the controlled use area or the transportation into the area of game meat that has been processed for human consumption. The PCUA is bounded by a line beginning at the old village of Paimiut, then north along the west bank of the Yukon River to Paradise, then northwest to the mouth of Stanstrom Creek on the Bonasila River, then northeast to the mouth of the Anvik River, then along the west bank of the Yukon River to the lower end of Eagle Island (approximately 45 miles north of Grayling), then to the mouth of the Iditarod River, then down the east bank of the Innoko River to its confluence with Paimiut Slough then south along the east bank of Paimiut Slough to its mouth and then to the old village of Paimiut.

Unit 21 has a positive C&T finding for moose and an ANS of 600–800 moose.

Unit 21E has a positive Intensive Management (IM) finding for moose with a population objective of 9,000–11,000 and a harvest objective of 550–1,100.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, it would make progress toward meeting the Intensive Management (IM) harvest objective and is intended to slow this population's growth. antlerless moose would be harvested, which would also help in making progress toward meeting IM harvest objectives, provide additional opportunity, and help to stabilize the moose density.

**BACKGROUND:** This moose population is beginning to show signs of nutritional stress. Opening a hunt that includes cow harvest would likely stabilize moose densities. The most current survey in 2019 indicated there are 9,777 moose in Unit 21E and a harvestable surplus of 390. Bull-to-cow ratios are high, with 42 bulls per 100 cows in 2018.

Within the Unit 21E moose survey area (4,094 mi<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 2.1 moose/mi<sup>2</sup> in 2019. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. The 2-year average twinning rate in the Holy Cross area is 12%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 32%. The current intensive management plan calls for stabilizing the population through harvest when the 2-year average twinning rate is 15–20%. Browse utilization is high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** opening a hunt that includes cow harvest to stabilize moose densities but is **NEUTRAL** on the allocative aspects of this proposal. Twinning rates are a strong indicator of the nutritional status of a moose population and as the population has grown in Unit 21E, the twinning rates observed during spring surveys have declined. Browse utilization is high and it is time to stabilize this growing moose population with carefully regulated cow harvest. Additional harvest is available and allowing winter opportunity will spread out hunting pressure and increase harvest.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 108 – 5 AAC 92.052 (5). Discretionary permit hunt conditions and procedures. Establish check stations and require trophy destruction of moose antlers for RM836 in 21E.** Institute antler destruction for moose taken with an RM836 permit and establish check stations in specific communities in the Yukon River drainage.

**PROPOSED BY:** Eugene Paul

**WHAT WOULD THE PROPOSAL DO?** This proposal would require destruction of antlers from moose harvested under a RM836 permit and establish 4 mandatory check stations in the communities of Grayling, Anvik, Shageluk, and Holy Cross.

**WHAT ARE THE CURRENT REGULATIONS?**

**Unit 21E:**



Residents

One antlered bull by registration permit (RM836) during September 1–25

Nonresidents

One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side by drawing permit (DM837/DM839) during September 5–25

In Unit 21E, the moose meat that must be left on the bone when salvaged prior to October 1 are the front quarters, hind quarters, and ribs for both resident and nonresident hunters.

Unit 21E has a positive finding for intensive management (IM), with IM objectives for a population of 9,000–11,000 and harvest of 550–1,100 moose.

There is a positive C&T finding for moose, and an ANS of 600–800 moose for all of Unit 21.

The department has the discretionary authority to require permit holders to stop at check stations before entering and upon leaving the field, for the dissemination of information and for collection of biological samples. The department also has the discretionary authority to nullify the trophy value of animals taken under subsistence permits.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, it would require hunters who harvest a moose under the resident only RM836 registration permit to destroy the trophy value of their antlers by cutting at least one antler in half upon harvest. Hunters passing through Grayling, Anvik, Shageluk, or Holy Cross would present their meat and antlers at established check stations to ensure regulation compliance involving meat care and trophy destruction.

**BACKGROUND:** The proposed regulation would only impact resident hunters, who must hold a RM836 permit, by requiring permit holders to destroy antlers and check their moose in at one of 4 check stations run by local volunteers or vendors. As written, this proposal would not impact nonresident drawing permit holders. No more than 50 nonresident drawing permits are issued each year in Unit 21E.

The 2019 moose population estimate for all of Unit 21E (7,993 mi<sup>2</sup>) is 9,777 moose (2.1 moose/mi<sup>2</sup>.) There is a harvestable surplus of approximately 391 moose; an average of 169 moose have been taken under RM836 annually during RY14–RY18; and an average of 23 moose/year were taken by an average of 49 nonresident drawing permit holders. The combined resident and nonresident harvest during RY14–RY18 is 200 moose/year, well below the harvestable surplus and the IM harvest objective of 550–1,100.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because there are no biological concerns regarding the moose population at current harvest levels or densities.

There are no biological samples needed to achieve management goals or to monitor moose populations in Unit 21E. Absent the need to collect biological samples, the department cannot set up mandatory check stations. The proponent mentions an enforcement aspect; however, volunteers have no enforcement authority.

**COST ANALYSIS:** Adoption of this proposal, mostly concerning the implementation of check stations, would result in additional costs to the department because they cannot be staffed entirely by volunteers.

\*\*\*\*\*

**PROPOSAL 109 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the current harvest ticket requirements for moose to a registration permit in Unit 21A.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee, and Grayling, Anvik, Shageluk, and Holy Cross (GASH) Fish and Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the general season moose harvest ticket hunt to a registration permit hunt in Unit 21A. The seasons and bag limits would otherwise remain the same.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations for moose hunting in Unit 21A are as follows:

Residents- One antlered bull by harvest ticket September 5–25

Nonresidents- One bull with 50-inch antler or antler with 4 or more brow tines on at least one side by harvest ticket September 5–25.

Unit 21A includes a small portion of the **Paradise Controlled Use Area (PCUA)**, in southwestern Unit 21A, which *is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, and/or parts of moose*; however, this does not apply to the transportation of moose hunters, their hunting gear, and/or parts of moose by aircraft between publicly owned airports within the controlled use area or the transportation into the area of game meat that has been processed for human consumption. The PCUA is bounded by a line beginning at the old village of Paimiut, then north along the west bank of the Yukon River to Paradise, then northwest to the mouth of Stanstrom Creek on the Bonasila River, then northeast to the mouth of the Anvik River, then along the west bank of the Yukon River to the lower end of Eagle Island (approximately 45 miles north of Grayling), then to the mouth of the Iditarod River, then down the east bank of the Innoko River to its confluence with Paimiut Slough then south along the east bank of Paimiut Slough to its mouth and then to the old village of Paimiut.

In Unit 21E, moose meat that must be left on the bone when salvaged prior to October 1 are the front quarters, hind quarters, and ribs for both resident and nonresident hunters.

Unit 21A has a negative finding for intensive management (IM).

There is a positive C&T use finding for moose with an ANS of 600–800 moose for all of Unit 21.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, both resident and nonresident moose hunters would be required to

possess a registration permit instead of a moose harvest ticket in Unit 21A. Seasons and bag limits would remain the same. This permit would be available at Fish and Game Offices and online. The department would likely receive better reporting information than that obtained through a harvest ticket; however the department does not currently have concerns with the population so the absence of this additional information has not prevented the department from managing the hunt.

**BACKGROUND:** During RY2009–RY2018, nonresident moose harvest in Unit 21A averaged 22 moose/year and resident hunters harvested an average of 23 moose/year.

The harvestable surplus in Unit 21A is about 100 moose based on a 4 percent harvest rate of the overall population. Current reporting and success indicate that about 50 percent of the harvestable surplus is being harvested. There are concerns with unreported harvest that may be at a level that is closer to the maximum sustainable harvest for the population. For comparison, to address poor reporting issues in Unit 21E, the board adopted a GASH proposal in 2014, which requires residents to possess registration permit RM836 to hunt moose in Unit 21E. During RY2009–RY2013, prior to implementation of RM836, an average of 138 residents/year hunted moose in Unit 21E and reported an average annual harvest of 96 moose/year. That average rose to 287 hunters/year and reported harvest increased to an average annual harvest of 180 moose/year during RY2014–RY2018 after the implementation of RM836. This suggests increased reporting accuracy in this area resulted from the registration permit requirement.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it does not currently have any biological concerns for the population. However, registration permits do promote better reporting to aid in moose management decisions in Unit 21A. If the proposal is adopted, the board will need to determine if reasonable opportunity is still provided because of the change in hunt administration for this portion of Unit 21, including the use of department discretionary permit authority.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 110 – 5 AAC 92.011 (k)(3). Taking of game by proxy.** Allow proxy hunting for moose in Unit 19D.

**PROPOSED BY:** Roger Seavoy

**WHAT WOULD THE PROPOSAL DO?** This would amend 92.011(k) (3) to add Unit 19D as an area in which proxy hunting for moose is permitted.

**WHAT ARE THE CURRENT REGULATIONS?** Currently, proxy hunting by Alaska residents is allowed for moose in Tier II hunts, any-bull hunts, and antlerless moose hunts.

In Unit 19D residents may harvest “one antlered bull” by harvest ticket or registration permit depending on the drainage and area.

The board has made a positive C&T finding for moose in Unit 19, in that portion outside of the

Lime Village Management Area (LVMA), with an ANS) of 400–700 moose, including 175–225 in Unit 19A and 20-24 in Unit 19B. The Board has also made a separate positive C&T finding for moose in the LVMA, which is entirely within Unit 19A, with an ANS of 30–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Proxy hunting for moose would be allowed in Unit 19D, which may result in increased opportunity and harvest.

**BACKGROUND:** In previous regulatory years, the department interpreted that an any antlered bull bag limit was eligible for proxy hunting in Unit 19D because there were no antler restrictions; however, the interpretation was not consistent with what is found in 5 AAC 92.011 (k)(3). The department stopped issuing proxy forms the following regulatory year in hunts with an any antlered bull bag limit. The proponent wishes to allow proxy hunting in Unit 19D but maintain the any antlered bull bag limit because they want to reduce the harvest of calves. An any antlered bull bag limit allows bulls of any antler size and configuration to be harvested so long as antlers are present, whereas any-bull hunts allows bull calves to be harvested.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because no biological concerns are generated or addressed by this proposal. In general, the department is supportive of additional harvest opportunity where possible.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 111 – 5 AAC 92.011 (k)(3). Taking of game by proxy.** Allow proxy hunting for moose in Units 21A and 21E.

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross (GASH) Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** This would add Units 21A and Unit 21E as areas in which proxy hunting for moose is permitted.

**WHAT ARE THE CURRENT REGULATIONS?** Currently proxy hunting is allowed for moose in Tier II hunts, any-bull hunts, and antlerless moose hunts.

In Unit 21A, residents may harvest “one antlered bull” by harvest ticket September 5–25.

In Unit 21E, residents may harvest “one antlered bull” by registration permit September 1–25.

Unit 21 has a positive C&T finding for moose and an ANS of 600–800 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Proxy hunting for moose would be allowed in Units 21A and 21E. Adoption of this proposal is not expected to result in a significant change in harvest because this was the practice for many years.

**BACKGROUND:** In previous regulatory years, the department interpreted that an any antlered bull bag limit was eligible for proxy hunting in Units 21A and 21E because there were no antler

restrictions; however, our interpretation was not consistent with what is found in 5 AAC 92.011 (k)(3) We stopped issuing proxy forms in hunts with an any antlered bull bag limit. The GASH AC wishes to allow proxy hunting in 21A and 21E but maintain the any antlered bull bag limit because they want to reduce the harvest of calves. An any antlered bull bag limit allows bulls of any antler size and configuration to be harvested so long as an antler is present, whereas any-bull hunts allows bull calves to be harvested.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it is an allocation issue.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 112 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the moose harvest ticket requirement to a registration permit within the Farewell area of Unit 19C.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the moose harvest ticket requirement to a registration permit within the portion of Unit 19C between the east bank of the Windy Fork and the west bank of South Fork, from the Alaska Range mountains north to the boundary between Units 19C and 19D. The season dates, antler restrictions, and bag limits would otherwise remain the same.

**WHAT ARE THE CURRENT REGULATIONS?** All of Unit 19C requires both resident and nonresident moose hunters to possess a harvest ticket. The season is September 1–20. The bag limit for residents is one bull with spike, fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side. The bag limit for nonresidents is one bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side.

The board has made a positive C&T finding for moose in Unit 19, in that portion outside of the Lime Village Management Area (LVMA), with an ANS of 400–700 moose, including 175–225 in Unit 19A.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, both resident and nonresident hunters would be required to possess a registration permit instead of a harvest ticket to hunt moose in a newly designated portion of Unit 19C between the east bank of the Windy Fork and the west bank of South Fork, from the mountains north to the boundary between Units 19C and 19D commonly known as the Farewell hunt area. Seasons, antler restrictions, and bag limits would not change, and the department does not anticipate limiting permits or adding any discretionary permit conditions, such as salvage requirements or locking tags. Similar to harvest tickets, the permit would be available at ADF&G offices and online.

**BACKGROUND:** The Farewell area north of the Alaska Range in Unit 19C is a popular moose hunting destination for both resident and nonresident hunters. During September, this area is busy with aircraft and ATVs utilized by hunters to harvest moose. Hunters achieve high harvest

rates within a relatively small hunt area, necessitating the need for accurate harvest reporting. Through analysis of harvest reports in conjunction with law enforcement observations, we observed that the reported harvest through harvest tickets in Unit 21A does not reasonably represent harvest and effort in this area. We estimate that about 60–70% of hunters report their hunting activity in this area.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal because it would promote better harvest reporting. Accurate harvest reporting is essential to properly manage this heavily hunted area.

**COST ANALYSIS:** Adoption of this proposal would result in minimal additional costs to the department.

\*\*\*\*\*

**PROPOSAL 113 – 5AAC 92.003. Hunter education and orientation requirements.** This would require nonresident hunters to complete hunter orientation prior to hunting moose in Units 21A and 21E.

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross (GASH) and McGrath Fish and Game Advisory Committees

**WHAT WOULD THE PROPOSAL DO?** This proposal would require nonresidents who hunt moose in Units 21A and 21E to watch the videos “*Is This Bull Legal?*” and “*Field Care of Big Game*” before hunting in these units unless they are guided or hunting with a family member within the second degree of kindred. There would be no changes to seasons, antler restrictions, or bag limits.

**WHAT ARE THE CURRENT REGULATIONS?** Current moose hunting regulations are as follows:

**Unit 21A**

- Residents — One antlered bull by harvest ticket during September 5–25
- Nonresidents — One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side with a harvest ticket during September 5–25.

**Unit 21E**

- Residents — One antlered bull by registration permit (RM836) during September 1–25. Permits available online, from license vendors in Unit 21E, or ADF&G (McGrath and Fairbanks) beginning August 1
- Nonresidents — One bull with 50-inch antlers or antlers with 4 or more brow tines on at least on side by drawing permit (DM837/DM839) during September 5–25.

**Paradise Controlled Use Area (PCUA)** in southwestern Unit 21A is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, and/or parts of moose; however, this does not apply to the transportation of moose hunters, their hunting gear, and/or parts of moose by aircraft between publicly owned airports within the controlled use area or the transportation into the area of game meat that has been processed for

human consumption. The PCUA is bounded by a line beginning at the old village of Paimiut, then north along the west bank of the Yukon River to Paradise, then northwest to the mouth of Stanstrom Creek on the Bonasila River, then northeast to the mouth of the Anvik River, then along the west bank of the Yukon River to the lower end of Eagle Island (approximately 45 miles north of Grayling), then to the mouth of the Iditarod River, then down the east bank of the Innoko River to its confluence with Paimiut Slough then south along the east bank of Paimiut Slough to its mouth and then to the old village of Paimiut.

In Units 21A and 21E, moose meat that must be left on the bone when salvaged prior to October 1, includes the front quarters, hind quarters, and ribs.

There is a positive C&T finding for moose and an ANS finding of 600–800 moose for all of Unit 21.

There are currently no orientation requirements for moose hunters in these units; however, the department has the discretionary authority to require that permit holders watch the videos prior to hunting. The department does not have the authority to impose the requirement on hunters participating in hunts administered with harvest tickets.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal would further efforts to reduce waste and spoilage of moose taken by unguided nonresident moose hunter. In addition, this proposal would align the orientation requirements with Unit 19B.

**BACKGROUND:** A requirement like that found in Unit 19B where nonresident hunter orientation has been required since RY1997 could improve meat care, although the department has no data regarding meat care improvements in Unit 19B. Much of the moose meat harvested by nonresidents in Unit 21E is donated to people in GASH communities, McGrath, and other surrounding communities.

Meeting the nonresident hunter orientation requirement would be accomplished through online videos, a quiz, and certification of completion, and are all obtainable through the internet.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because there are no biological concerns regarding moose in these areas. The department is supportive of hunter education.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 114–5 AAC 85.025. Hunting seasons and bag limits.** Delete the Unit 19D Remainder winter harvest ticket hunt for one caribou and open an antlerless winter registration hunt for caribou in Units 19D and 21A with a longer season.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would open a winter registration hunt for one antlerless caribou in Units 19D and 21A during November 1–last day of February.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are as follows:

Unit 21A:

Both residents and nonresidents: One bull with a harvest ticket, August 10–September 20.

Unit 19D Within drainages of the Nixon Fork River:

Both residents and nonresidents: One bull with a harvest ticket, August 10–September 20.

Unit 19D Remainder:

Residents: One bull with harvest ticket, August 10–September 20.

OR

One caribou with harvest ticket, November 1–January 31.

Nonresidents: One bull with harvest ticket, August 10–September 20.

The board has made a positive C&T finding for caribou of the Big River and Rainy Pass herds in Units 16B, 19B, 19C, and 19D, with an ANS of 50–70 caribou. The board has made a positive C&T finding for caribou of the Beaver Mountains and Sunshine Mountains herds in Units 19A, 19D, 21A, and 21E, with an ANS of 5. The board has also made a positive C&T finding for caribou of the Tonzona herd in Unit 19 with an ANS of 20–30 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted it would begin an antlerless winter caribou registration hunt in all of Unit 19D and Unit 21A during November 1–last day of February. Although the new regulation would expand the season and hunt area, the antler restriction would limit harvest to mostly bull caribou and nonpregnant cows. The proposal also requests unspecified aircraft restrictions; however, it is the department’s understanding that the intent was to prohibit aircraft use except between public airports. There would be no changes to the fall seasons.

**BACKGROUND:** The Beaver and Sunshine Mountain caribou herds, estimated at about 1,000 animals combined, provide a majority of the caribou harvest opportunity in Units 19D and 21A. Average harvest from the Beaver and Sunshine herds during RY2014–RY2018 was about 3 caribou/year (range 0–6). Harvest is generally low due to difficult access in fall and winter.

During winter, a large portion of the Beaver Mountains and Sunshine Mountains caribou are found within the Nixon Fork River drainages in Unit 19D and are easily accessible by snowmachine. This proposal would increase access to these previously restricted areas during the winter months, and open new opportunities in Unit 21A. The proposed hunt creates a longer season to pursue these caribou. Due to the length of the season and new accessibility to areas of caribou occupation, harvest would need to be monitored closely, such as with a registration permit, in season, to ensure overharvest does not occur.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** additional harvest where possible, however information about these herds is limited. The Beaver Mountains and Sunshine Mountains caribou herds can sustain a very small amount of additional harvest. If adopted, the hunt must be closely monitored to ensure that harvest does not exceed sustainable levels. If this



proposal is adopted, the department will implement a short reporting requirement (e.g., report within 24 hours of taking a caribou) and will close the hunt by emergency order authority when the harvest quota is met. The board will also need to clarify exactly what aircraft restrictions should be implemented as part of this new hunt, if this proposal is adopted. If adopted, this will be the first hunt for antlerless caribou, which may result in some confusion for hunters.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 115 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** This proposal would standardize requirements of meat to be left on the bones of caribou, moose, and bison harvested in Units 19, 21A, and 21E.

**PROPOSED BY:**

McGrath Fish and Game Advisory Committee, Stony Holitna Fish and Game Advisory Committee, Central Kuskokwim Fish and Game Advisory Committee, and Grayling, Anvik, Shageluk, and Holy Cross (GASH) Fish and Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** This proposal would require meat to be left on the front quarter, hind quarter and ribs for moose, caribou, and bison harvested in Units 19, 21A, and 21E.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations for meat that must be left on the bone when salvaged prior to October 1 are as follows:

<b>Unit</b>	<b>Caribou</b>	<b>Moose</b>	<b>Bison</b>
Unit 19A (Holitna–Hoholitna Controlled Use Area)	Front quarter, hind quarter	Front quarter, hind quarter	No meat on bone requirements
Unit 19A remainder	No meat on bone requirements	No meat on bone requirements	No meat on bone requirements
Unit 19B	Front quarter, hind quarter	Front quarter, hind quarter	No meat on bone requirements
Unit 19C	No meat on bone requirements	No meat on bone requirements	No meat on bone requirements
Unit 19D	No meat on bone requirements	No meat on bone requirements	No meat on bone requirements
Unit 21A	Front quarter, hind quarter	Front quarter, hind quarter, ribs	No meat on bone requirements
Unit 21E	No meat on bone requirements	Front quarter, hind quarter, ribs	No meat on bone requirements

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would standardize the meat on bone requirements across Units 19, 21A, and 21E. The standardized regulation would require front quarter, hind quarter, and rib meat to be left on the bones of caribou, moose, and bison harvested in these units until transported to the location it will be processed for human consumption. This would simplify regulations and alleviate potential confusion among users, increase meat quality, and aid law enforcement in determining if all meat was salvaged. This will also be the first area in the state with a meat on the bone requirement for bison.

**BACKGROUND:** Currently, there is broad variation concerning meat-on-bone salvage requirements for caribou and moose harvested across Units 19, 21A, and 21E. If adopted, this proposal would standardize those salvage requirements. Bison were added to the list of meat on the bone requirements in order to address harvests of Farewell bison as well as the eventual harvest of wood bison in Unit 21E.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal. The department has no biological concerns regarding meat salvage in any of these areas. If adopted, the board should consider if this will apply to animals harvested prior to October 1, as is the standard for most meat on the bone salvage requirements.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 116 – #2020-XXX-BOG Finding.** This proposal seeks findings for the Unit 19A muskox population management strategy.

**PROPOSED BY:** Central Kuskokwim Fish and Game Advisory Committee (CKAC)

**WHAT WOULD THE PROPOSAL DO?** This proposal would seek findings issued from the Board of Game regarding muskox herd management strategies in Unit 19A.

**WHAT ARE THE CURRENT REGULATIONS?** There is currently no open season for muskox in Unit 19A and the board has not determined if muskox are customarily and traditionally taken or used for subsistence in Unit 19A. Muskoxen in Unit 18 have a negative C&T finding.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposal seeks the following findings from the Board of Game:

This strategy applies to the Unit 19A portion of the Kuskokwim River drainage, Portage Mountain muskox herd.

- The muskox season in this area will remain closed for 4 years beginning in 2020;
- The season will be opened with a limited number of permits only after 4 years of no hunting, or after there is a minimum muskox population in the Portage Mountains of 150 animals;
- There will be no cow hunts unless habitat degradation occurs from excessive browsing;

- It is understood that a large muskox population will serve (but not completely) the subsistence needs of the residents of this area. The Central Kuskokwim AC fully expects that as limited subsistence hunting begins on this herd, the number of musk ox harvested locally will be a priority;
- Enforcement has a role in this strategy that needs to be developed in a cooperative fashion;
- The CKAC desires to collaborate with the local communities in drafting the management plan
- The department is committed to achieving at least 150 muskoxen in the Portage Mountain Musk Ox count area.

**BACKGROUND:** The southwestern Alaska muskox population (which originates from Nelson Island in Unit 18) recently expanded their range to include portions of Units 19A and 21E. Approximately 100 muskoxen are located within the Portage Mountain area north and northeast of Lower Kalskag and Upper Kalskag in Unit 19A and South of Paimiut in Unit 21E.

Movement patterns and demographics are not well documented at this time, but aerial surveys to collect composition, recruitment, and minimum population counts have been recently implemented to start accumulating baseline population data to inform management of this herd. The department is in the process of writing a 5-year muskox management plan for this new population as part of our standard survey and inventory work. It is expected to be published in December 2020.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal. This is not a regulatory issue, but a means to establish a management plan from findings for future allocation purposes. Should the board adopt the proposal and adopt findings that allow for a hunt to happen in the future, the board will also need to determine whether or not there are customary and traditional uses of muskoxen in the area.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 117 – 5 AAC 99.025(a)(12)(B). Customary and traditional uses of game population(s).** Address customary and traditional use findings for grouse in Unit 19 & develop regulations to provide reasonable opportunity for subsistence uses.

**PROPOSED BY:** Anna Frank

**WHAT WOULD THE PROPOSAL DO?** Determine if there are customary and traditional (C&T) subsistence uses of grouse in Unit 19 and establish an amount reasonably necessary for subsistence uses (ANS).

**WHAT ARE THE CURRENT REGULATIONS?** The Board has not made a determination regarding the customary and traditional uses of grouse hunted in Unit 19. Current regulations include positive customary and traditional use findings for grouse in units 11, 12, 13, 15, 16, 20–25, and outside the

Anchorage-Matsu-Kenai and Fairbanks nonsubsistence areas, with no established ANS. The current hunting season for grouse in Unit 19 is August 10–April 30, with a bag limit of 15 per day, 30 in possession.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Subsistence uses of grouse in Unit 19 would be given priority over other uses.

**BACKGROUND:** When considering regulations to provide hunting opportunities, the Board is required by state law (AS 16.05.258) to identify game populations, or portions of populations, that support customary and traditional subsistence uses (a “C&T finding”) and to determine the amount of a harvestable portion of a stock or population that is reasonably necessary for subsistence uses (ANS). Because no findings for grouse in Unit 19 were in regulation, the department has presented a C&T worksheet, Special Publication BOG 2020-XX, that addresses grouse. Residents of Unit 19 and other Alaska residents have an established history of harvest and use of grouse as a wild food source as documented in household surveys and ethnographic studies conducted by the department.

**DEPARTMENT COMMENTS:** The department supports determining a C&T finding for grouse in Unit 19 and is **NEUTRAL** on this proposal due to allocative aspects; however, the department notes the long-documented subsistence harvest and use of grouse in Unit 19. The board should evaluate the customary and traditional uses of grouse in Unit 19 and evaluate the options for establishing an amount reasonably necessary for subsistence uses.

**COST ANALYSIS:** Approval of this proposal is not expected to result in an additional cost to the department.

\*\*\*\*\*

**PROPOSAL 118 – 5 AAC 99.025(a)(12)(C). Customary and traditional uses of game population(s).** Address customary and traditional use findings for ptarmigan in Unit 19 & develop regulations to provide reasonable opportunity for subsistence uses.

**PROPOSED BY:** Anna Frank

**WHAT WOULD THE PROPOSAL DO?** Determine if there are customary and traditional (C&T) subsistence uses of ptarmigan in Unit 19 and establish an amount reasonably necessary for subsistence uses (ANS).

**WHAT ARE THE CURRENT REGULATIONS?** The Board has not made a determination regarding the customary and traditional uses of ptarmigan hunted in Unit 19. Current regulations include positive customary and traditional use findings for ptarmigan in units 11, 12, 13, 15, 16, 20–25, and outside the Anchorage-Matsu-Kenai and Fairbanks nonsubsistence areas. The Board has established an amount reasonably necessary for subsistence in Unit 18 at 3,000 – 23,000 ptarmigan, and in Unit 22 at 125–900 ptarmigan. The Board has not determined an amount reasonably necessary for subsistence in any other units where there is an established customary and traditional use finding. The current hunting season for ptarmigan in Unit 19 is August 10–April 30, with a bag limit of 20 per day, 40 in possession.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Subsistence uses of ptarmigan in Unit 19 and an amount reasonably necessary for subsistence would be given priority over other uses.

**BACKGROUND:** When considering regulations to provide hunting opportunities, the Board is required by state law (AS 16.05.258) to identify game populations, or portions of populations, that support customary and traditional subsistence uses (a “C&T finding”) and to determine the amount of a harvestable portion of a stock or population that is reasonably necessary for subsistence uses (ANS). Because no findings for ptarmigan in Unit 19 were in regulation, the department has presented a C&T worksheet, Special Publication BOG 2020-XX, that addresses ptarmigan. Residents of Unit 19 and other Alaska residents have an established history of harvest and use of ptarmigan as a wild food source as documented in household surveys and ethnographic studies conducted by the department.

**DEPARTMENT COMMENTS:** The department supports determining a C&T finding for ptarmigan in Unit 19 and is **NEUTRAL** on this proposal due to allocative aspects; however, the department notes the long-term documented subsistence harvest and use of ptarmigan in Unit 19. The board should evaluate the customary and traditional uses of ptarmigan in Unit 19 and evaluate the options for establishing an amount reasonably necessary for subsistence uses.

**COST ANALYSIS:** Approval of this proposal is not expected to result in an additional cost to the department.

\*\*\*\*\*

**PROPOSAL 119 – 5 AAC 84.270(5). Furbearer trapping.** Lengthen the lynx trapping season in Units 19C, 19D, and 21A to November 1–March 31.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would extend the current lynx trapping season by 16 days from November 1–March 15 to November 1–March 31 in Units 19C, 19D, and 21A.

**WHAT ARE THE CURRENT REGULATIONS?** Current trapping season and bag limits for lynx in Units 19C, 19D, and 21A are November 1–March 15, with no bag limit.

Current hunting season and bag limits for lynx in Units 19C, 19D, and 21A are November 1–Last day of February, with a bag limit of two lynx.

The board has made a positive C&T use finding for lynx in all units with a harvestable surplus and established the ANS at 90% of the harvestable portion.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted it would extend the lynx trapping season 16 days to the end of March in Units 19C, 19D, and 21A. Bag limits would remain the same. This would also align lynx trapping season dates with wolverine trapping season dates within these subunits.

**BACKGROUND:** Lynx caught after March 15 are considered incidental catch and must be surrendered to the department. Lynx can be caught in wolf traps or wolverine traps during this period since trapping is still permitted for those species.

There are no conservation concerns resulting from a longer lynx season and potential increased harvest during this 16-day period. The longer season is unlikely to substantially increase harvest because lynx trapping does not drive trapping effort in these areas. Most trappers in Units 19C, 19D, and 21A primarily target marten. Many trappers leave their trapline after marten season closes on the last day of February.

In 2014, the board adopted a proposal to extend the lynx trapping season from November 1–Last day of February to November 1–March 15. Average annual lynx harvest in Units 19C, 19D, and 21A during RY09–RY13 was 33 (range 15–55), 28 (range 27–39), and 2 (range 1–4) respectively. During those 5 regulatory years, there were no incidental catches in March in 19C or 21A, and a total of 4 lynx in 19D.

After the board adopted the November 1–March 15 trapping season, the average annual lynx harvests in Unit 19C, 19D, and 21A during RY14–RY18 was 8 (range 0–20), 10 (range 7–16), and 1 lynx, respectively. The total number of additional lynx harvested within the 15 day extension in March during RY14–RY18 was 10 lynx in 19C, 7 lynx in 19D, and 0 in 21A.

With the addition of 15 days to the trapping season in RY14, there was no overall increase in lynx harvest. Annual lynx harvest declined during RY14–RY18, most likely because the few high-volume trappers no longer trap in the area.

The board may wish to consider the issue of pelt quality during the extension of the season. Some trappers contend that fur quality decreases towards the end of March, and therefore lynx should not be trapped. Others believe there is no difference in fur quality during the time frame of the extension.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal for increased opportunity because harvest pressure is low, and there are no biological concerns. The numbers of lynx that were harvested with the addition of 15 days to the season starting in RY14 resulted in 17 additional lynx across all 3 Units. Even if this number were to double with the proposed extension through the end of March 31, there would be no conservation concerns.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 120 – 5AAC 85.045. Hunting seasons and bag limits for moose.** Shorten the season for the any-bull moose drawing permit hunt in Unit 20A.

**PROPOSED BY:** Leroy Sutton

**WHAT WOULD THE PROPOSAL DO?** Shorten the length of the any-bull drawing permit season from 1–25 September to 1–10 September.

## **WHAT ARE THE CURRENT REGULATIONS?**

The bull moose seasons in Unit 20A are:

Unit 20A Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area

### **Residents:**

- One bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, harvest ticket, 1–25 September
- One bull, drawing permit (DM770, DM771, DM774), 1–25 September
- One bull, by muzzleloader, drawing permit (DM766), 1 November–15 December

### **Nonresidents:**

- One bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, harvest ticket, 1–25 September
- One bull, by muzzleloader, drawing permit (DM766), 1 November–15 December

Unit 20A Remainder

### **Residents:**

- One bull with spike-fork or 50-inch antlers or antlers with 3 or more brow tines on at least one side, harvest ticket, 1–25 September
- One bull, drawing permit (DM768, DM769, DM772, DM773), 1–25 September

### **Nonresidents:**

- One bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, harvest ticket, 1–25 September

Refer to the *2019–2020 Alaska Hunting Regulations* for antlerless moose hunting seasons in this area.

The intensive management (IM) population objective for moose in Unit 20A is 10,000–15,000 moose and the IM harvest objective is 500–900 moose.

Portions of Unit 20A are outside the Fairbanks Nonsubsistence Area and have a positive C&T finding for moose, with an ANS of 50–75.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, the current season length for these 7 drawing permit hunts would decrease from 25 days to 10 days. The resulting shorter any-bull draw season would result in decreased harvest and potential failure to meet IM harvest objective minimum (500 moose). If IM objectives are not met when the shorter season is implemented, the department will need to increase the number of drawing permits in the future to ensure objectives are met.

**BACKGROUND:** There are no biological concerns with the moose population in Unit 20A under the current harvest strategy. The current moose hunts in Unit 20A include a harvest ticket

antler-restricted bull hunt, antlerless drawing and registration hunts, and 8 any-bull drawing hunts (7 in September and 1 by muzzleloader in November–December). The most recent population estimate (12,315 moose in 2015) was within the IM population objective and the average harvest (589 moose) was also within the IM harvest objective during regulatory years 2014 through 2018 (RY14–RY18; for example, RY14 is 30 July 2014 through 30 June 2015). Harvest in the 7 any-bull drawing hunts during September averaged 219 moose/year and the harvest ticket antler-restricted (spike/fork/>50 inch) hunt averaged 269 moose/year over the same 5-year period. The current bull-to-cow management objective for Unit 20A over this period has remained at 30 bulls per 100 cows.

The department attempted a moose population survey in Unit 20A in 2018 but was unsuccessful in completing it because of inadequate snow cover. Another attempt during November 2019 may provide more updated information. Due to a lack of current survey data and concern from local advisory committees, the department has taken a conservative approach to these hunts and reduced the total number of fall 2019 any-bull permits in Unit 20A from 1,205 to 798 permits.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal given its allocative aspects. However, a shorter any-bull draw season would result in decreased harvest and potential failure to meet the IM harvest objective minimum (500 moose). If IM objectives are not met during the shortened season, the number of drawing permits will need to be increased to ensure objectives are met, which could lead to increased crowding.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 121 – 5AAC 85.045. Hunting seasons and bag limits for moose.** Establish hunt areas for moose drawing permit DM770 in Unit 20A.

**PROPOSED BY:** Paul Nyberg

**WHAT WOULD THE PROPOSAL DO?** Divide the drawing moose hunt DM770 into 6 hunt areas aligned with the current antlerless drawing hunt areas.

**WHAT ARE THE CURRENT REGULATIONS?**

The bull moose seasons in Unit 20A are:

Unit 20A Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area

**Residents:**

- One bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, harvest ticket, 1–25 September
- One bull, drawing permit (DM770, DM771, DM774), 1–25 September
- One bull, by muzzleloader, drawing permit (DM766), 1 November–15 December

**Nonresidents:**



- One bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, harvest ticket, 1–25 September
- One bull, by muzzleloader, drawing permit (DM766), 1 November–15 December

#### Unit 20A Remainder

##### Residents:

- One bull with spike-fork or 50-inch antlers or antlers with 3 or more brow tines on at least one side, harvest ticket, 1–25 September
- One bull, drawing permit (DM768, DM769, DM772, DM773), 1–25 September

##### Nonresidents:

- One bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, harvest ticket, 1–25 September

Refer to the *2019–2020 Alaska Hunting Regulations* for antlerless moose hunting seasons in this area.

The intensive management (IM) population objective for moose in Unit 20A is 10,000–15,000 moose and the IM harvest objective is 500–900 moose.

Portions of Unit 20A are outside the Fairbanks Nonsubsistence area and have a positive C&T finding for moose, with an ANS of 50–75.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted the current any-bull drawing hunts would remain unchanged except DM770 would be broken into the same 6 hunt areas as current antlerless drawing permit hunt areas. The proposal recommends using hunt areas that are associated with antlerless moose drawing permits DM631 (Western Tanana Flats Central), DM642 (Ferry Trail Management Area East), DM644 (Healy–Lignite Management Area), DM647 (Healy Creek), DM652 (Moody Creek), and DM657 (Wood River CUA West). However, only 5 of these hunt areas overlap with DM770, and DM631 overlaps with any-bull hunt DM768, so it is unclear why that area was recommended in the proposal.

**BACKGROUND:** The department has no biological concerns with the moose population in Unit 20A under the current harvest strategy. The current moose hunts in Unit 20A include a harvest ticket antler-restricted bull hunt, antlerless drawing and registration hunts, and 8 any-bull drawing hunts (7 in September and 1 by muzzleloader in November–December). The most recent population estimate (12,315 moose in 2015) was within the IM population objective and the average harvest (589 moose) was also within the IM harvest objective during regulatory years 2014 through 2018 (RY14–RY18; for example, RY14 is 30 July 2014 through 30 June 2015). Harvest in the 7 any-bull drawing hunts in September averaged 219 moose/year and the harvest ticket antler-restricted (spike/fork/>50 inch) hunt averaged 269 moose/year over the same 5-year period. The bull-to-cow ratio during RY14–RY18 has remained at the management objective for Unit 20A of 30 bulls per 100 cows. This suggests that adequate bulls are in the area.

The department attempted a moose population survey in Unit 20A in 2018 but was unable to complete it because of inadequate snow cover. Another attempt during November 2019 may provide more updated information. Due to a lack of current survey data and concern from local advisory committees, we are proceeding with a conservative approach to these hunts and have reduced the total number of fall 2019 any-bull permits in Unit 20A from 1,205 to 798 permits.

For the fall 2019 season, DM770 permits were reduced from 125 to 50; if divided into 5 or 6 hunt areas, each area would be allocated 8–10 permits.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal, since it is primarily allocative and neither creates nor alleviates a conservation concern. Dividing the DM770 hunt area into smaller areas will spread hunters across the landscape. The department has already reduced the number of DM770 permits for this area by 60%. The board may wish to consider whether smaller hunt areas, such as those requested in this proposal are necessary or whether the current reduction in permit numbers will alleviate the perception that there are few bulls in the area.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 122 – 5 AAC 85.045(18) Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose seasons in Unit 20A.

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the antlerless moose hunting seasons in Unit 20A.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20A Ferry Management Trail, Wood River Controlled Use, and the Yanert Controlled Use Areas

Residents:

- Drawing permit for one antlerless moose, August 15–November 15.
- Targeted hunt for one moose by permit (AM751) announced by emergency order.
- Nonresidents:
- No antlerless moose seasons

Unit 20A remainder

Residents:

- Drawing permit for one antlerless moose, August 15–November 15.

- Registration permit for one antlerless moose, August 25–February 28, permits for most of Unit 20A have not been issued for several years because harvest is being obtained with drawing permits.
- Registration permit, RM768, has been issued to provide reasonable opportunity to harvest antlerless moose for subsistence uses; this hunt occurs outside the Fairbanks Nonsubsistence Area.

Nonresidents:

- No antlerless moose seasons

Refer to the *2019–2020 Alaska Hunting Regulations* for bull moose hunting seasons in this area.

The intensive management (IM) population objective for moose in Unit 20A is 10,000–15,000 moose and the IM harvest objective is 500–900 moose.

There is a positive C&T finding for moose in Unit 20A outside the boundaries of the Fairbanks Nonsubsistence Area with an ANS of 50–75 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The Alaska Department of Fish and Game (department) will have the authority to use antlerless hunts as a management tool to regulate the moose population in Unit 20A and to provide subsistence moose hunting opportunity.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts help regulate population growth, provide subsistence hunters with a reasonable opportunity to harvest moose, and can reduce incidences of vehicle collision and other nuisance situations. Overall, the goal is to protect the health and habitat of the moose population over the long term and to provide for a wide range of public uses and benefits.

The department intends to maintain the Unit 20A population at roughly 12,000 moose and monitor nutritional condition. In 2015, the post-hunt population estimate was 12,315 moose (10,622–14,009 @ 90% confidence interval). This high-density moose population (approximately 2.5 moose/mi<sup>2</sup>) continues to experience density-dependent effects, including low productivity and relatively light short-yearling female weights. Although sporadic signs of improvement in nutritional condition have been observed (i.e., higher twinning rates in 2017 and 2018 and increases in male short-yearling weights in 2015 and 2016 compared to the late 1990s through early 2000s), no clear signals or significant trends have yet been detected. The department recommends continued antlerless hunts in regulatory year 2020 to regulate population growth (i.e., stabilize the population at 12,000 moose).

Hunts for bull moose are also available in Unit 20A. Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about bull moose hunting seasons in Unit 20A.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal because antlerless hunts are an important management tool in regulating this high-density, nutritionally stressed moose population. If antlerless moose hunts are not reauthorized, the department will lose the ability to regulate this moose population, the IM harvest objectives

may not be met, and the IM population objective may be exceeded. Additionally, the public will lose opportunity to harvest a surplus of cow moose and subsistence hunters in the portion of Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 123 – 5 AAC 92.530 (13). Healy–Lignite Management Area.** Expand the Healy–Lignite Management Area in Unit 20A.

**PROPOSED BY:** Paul Nyberg

**WHAT WOULD THE PROPOSAL DO?** This proposal will expand the Healy–Lignite Management Area to the north to include all or portions of the drainages of Winter, Bonanza, Marguerite, and Emma creeks.

**WHAT ARE THE CURRENT REGULATIONS?** The Healy–Lignite Management Area is open to hunting by bow and arrow only and small game may also be taken by falconry. The area is currently defined as that portion of Unit 20A that includes the entire Lignite Creek drainage, and that portion of the Nenana River drainage south of the Lignite Creek drainage and north of a boundary beginning at the confluence of the Nenana River and Healy Creek, then easterly along the south bank of Healy Creek to its confluence with Coal Creek, then northeasterly to the headwaters of Sanderson Creek at Usibelli Peak. The Healy–Lignite Management Area is entirely within the Fairbanks Nonsubsistence Area.

The Ferry Trail Management Area is open to caribou hunting by permit only. It is also used as a hunt area descriptor for moose hunting in seasons and bag limits listed in 5 AAC 85.045.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would expand the Healy–Lignite Management Area (currently 71 square miles) to the north by adding 26 square miles to include the drainages of Winter Creek, Bonanza Creek, Marguerite Creek, and Emma Creek east of the east bank of Emma Creek. The written description in the proposal is somewhat unclear on the Emma Creek portion, but after a discussion with the proponent the area depicted on the map describes the intended expansion. This expanded area would result in a larger weapons-restricted hunting area while decreasing the size of the Ferry Trail Management Area. This would primarily affect moose hunters, but hunters pursuing bears, caribou, and other game would also be affected by enlarging the weapons-restricted hunting area, which would decrease the size of the unrestricted methods area. In addition to being restricted to archery-only, moose hunters in this area would have a less restrictive bag limit — a bull with spike–fork or 50-inch antlers or antlers with 3 or more brow tines on at least one side, instead of spike–fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side.

The Ferry Trail Management Area is open to caribou hunting by permit only. All caribou hunting throughout Unit 20A is by permit only, so decreasing the size of the Ferry Trail Management Area would not result in changes for caribou hunting.

**BACKGROUND:** The proposed expansion of the Healy–Lignite Management Area will transfer land from the Ferry Trail Management Area to the Healy–Lignite Management Area. The Healy–Lignite Management Area is restricted to hunting by bow and arrow and small game by falconry.

The area surrounding the Usibelli Coal Mine was closed to all hunting in 1973 and was referred to as the Healy–Lignite Closed Area. In 1990 the area was changed to the Healy–Lignite Management Area and was opened to hunting by bow and arrow only. In 2012, hunting small game by falconry was added. The boundaries of the area have changed somewhat over the years but remain largely similar to the original designated area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal, since it is allocative. There are no biological concerns associated with this proposal.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 124 – 5AAC 92.530 (13). Healy–Lignite Management Area.** Allow shotguns for hunting within the Healy–Lignite Management Area in Unit 20A.

**PROPOSED BY:** Jonathan Talerico

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow for the use of shotguns for hunting in the Healy–Lignite Management Area.

**WHAT ARE THE CURRENT REGULATIONS?** The Healy–Lignite Management Area is open to hunting by bow and arrow only and small game may also be taken by falconry. The area is currently defined as that portion of Unit 20A that includes the entire Lignite Creek drainage, and that portion of the Nenana River drainage south of the Lignite Creek drainage and north of a boundary beginning at the confluence of the Nenana River and Healy Creek, then easterly along the south bank of Healy Creek to its confluence with Coal Creek, then northeasterly to the headwaters of Sanderson Creek at Usibelli Peak; the area is open to hunting by bow and arrow only, and small game may be taken by falconry.

The Healy–Lignite Management Area is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposal would make it legal to hunt with shotguns in the Healy–Lignite Management Area. The proponent indicates the desire to hunt small game and game birds with shotguns, and while not directly stated, it would also be legal to hunt big game such as moose with shotguns as well.

**BACKGROUND:** The area surrounding the Usibelli Coal Mine was closed to all hunting in 1973 and was referred to as the Healy–Lignite Closed Area. In 1990, the area was changed to the Healy–Lignite Management Area and was opened to hunting by bow and arrow only. In 2012, hunting small game by falconry was added. The boundaries of the area have changed somewhat over the years but remain largely similar to the original designated area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal, since this is an allocation issue. There are no biological concerns regarding this proposal. The maximum projectile distance for both a bow and arrow and for a shotgun is under 1,000 yards (even less with shot smaller than 00 buck).

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 125 – 5 AAC 92.530 (13). Healy–Lignite Management Area.** Allow shotguns for hunting small game within the Healy–Lignite Management Area in Unit 20A.

**PROPOSED BY:** Jonathan Talerico

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow for the use of shotguns for hunting small game in the Healy–Lignite Management Area.

**WHAT ARE THE CURRENT REGULATIONS?** The Healy–Lignite Management Area is open to hunting by bow and arrow only and small game may also be taken by falconry. The area is currently defined as that portion of Unit 20A that includes the entire Lignite Creek drainage, and that portion of the Nenana River drainage south of the Lignite Creek drainage and north of a boundary beginning at the confluence of the Nenana River and Healy Creek, then easterly along the south bank of Healy Creek to its confluence with Coal Creek, then northeasterly to the headwaters of Sanderson Creek at Usibelli Peak; the area is open to hunting by bow and arrow only, and small game may be taken by falconry.

The Healy–Lignite Management Area is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposal would make shotguns legal for hunting small game in the Healy–Lignite Management Area. Allowing small game to be taken by shotgun in the Healy–Lignite Management Area would likely not create a situation more dangerous than hunting by bow and arrow.

**BACKGROUND:** The area surrounding the Usibelli Coal Mine was closed to all hunting in 1973 and was referred to as the Healy–Lignite Closed area. In 1990, the area was changed to the Healy–Lignite Management Area and was opened to hunting by bow and arrow only. In 2012, hunting small game by falconry was added. The boundaries of the area have changed somewhat over the years but remain largely similar to the original designated area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocative issue. There are no biological concerns regarding this proposal. The maximum projectile

distance for both a bow and arrow and for a shotgun is under 1,000 yards (even less with shot smaller than 00 buck).

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 126– 5 AAC 92.530 (13). Healy–Lignite Management Area.** Allow shotguns and rimfire weapons for hunting small game within the Healy-Lignite Management Area in Unit 20A.

**PROPOSED BY:** Zachary Cizmowski

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the use of shotguns and rimfire firearms for hunting small game in the Healy–Lignite Management Area.

**WHAT ARE THE CURRENT REGULATIONS?** The Healy–Lignite Management Area is open to hunting by bow and arrow only and small game may also be taken by falconry. The area is currently defined as that portion of Unit 20A that includes the entire Lignite Creek drainage, and that portion of the Nenana River drainage south of the Lignite Creek drainage and north of a boundary beginning at the confluence of the Nenana River and Healy Creek, then easterly along the south bank of Healy Creek to its confluence with Coal Creek, then northeasterly to the headwaters of Sanderson Creek at Usibelli Peak; the area is open to hunting by bow and arrow only, and small game may be taken by falconry.

The Healy–Lignite Management Area is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposed change would make it legal to hunt small game in the Healy–Lignite Management Area with shotguns and rimfire firearms. Hunting small game by shotgun in the Healy–Lignite Management Area would likely not create a situation more dangerous than hunting by bow and arrow.

**BACKGROUND:** In 1973, the area surrounding the Usibelli Coal Mine was closed to all hunting as a safety measure for mine workers and was referred to as the Healy–Lignite Closed area. In 1990 the area was changed to the Healy–Lignite Management Area and was opened to hunting by bow and arrow only. In 2012 hunting small game by falconry was added. The boundaries of the area have changed somewhat over the years but remain largely similar to the original designated area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocative issue. There are no biological concerns regarding this proposal. The maximum projectile distance is under 1,000 yards for a bow and arrow and a shotgun (even less with shot smaller than 00 buck), but the maximum projectile distance for a rimfire is 2–3 times that distance. If this proposal is adopted, clarification on what type of shotgun projectile (slugs, shot size, etc.) and which rimfire calibers would be allowed is recommended.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 127 – 5 AAC 92.540(3)(F) Wood River Controlled Use Area.** Modify the boundary of the Wood River Controlled Use Area (WRCUA) in Unit 20A.

**PROPOSED BY:** Eric Haugen

**WHAT WOULD THE PROPOSAL DO?** The proposed change would remove a large portion of the Wood River Controlled Use Area (WRCUA).

The proposed change would remove all the WRCUA west of the Wood River (Fig. 127.1). This would allow motorized access by decreasing the area of the WRCUA from 1,172 square miles to 223 square miles, a reduction of about 81%. The new boundary would be as follows:

The area consists of that portion of Unit 20A starting at the point where Snow Mountain Gulch Creek meets the Wood River, then bounded on the west by the east bank of the Wood River, following the Wood River upstream to its headwaters, then following the glacier east to the divide separating drainages flowing east (such as the West Fork Little Delta River) and those flowing west (such as Virginia Creek, Kansas Creek, Chute Creek, Rodgers Creek, Sheep Creek, Glacier Creek, and Three mile Creek), then following the divide north to the south bank of Snow Mountain Gulch Creek drainage, then following west down Snow Mountain Gulch Creek drainage to its intersection with the Wood River;



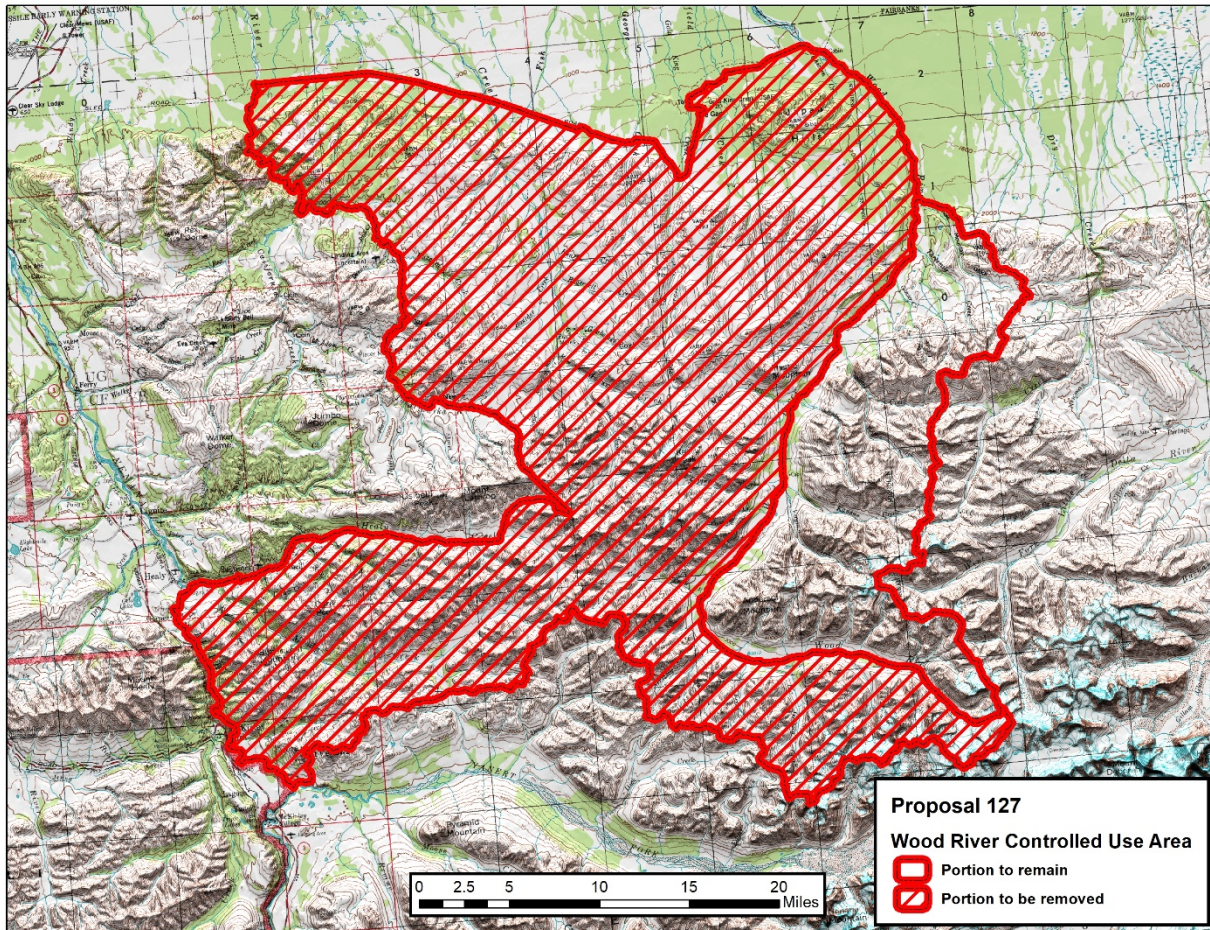


Figure 127.1. Proposed boundary change for the Wood River Controlled Use Area. Crosshatch area is proposed to be removed.

**WHAT ARE THE CURRENT REGULATIONS?** The Wood River Controlled Use Area (WRCUA) is closed to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through September 30; however, this provision does not prohibit motorized access via, or transportation of game on, the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption.

The WRCUA consists of that portion of Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the

south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along the east bank of Dexter Creek to the Totatlanika River, and then down the east bank of the Totatlanika River to the Rex Trail.

The WRCUA is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

If this proposal is adopted, a substantial increase of motorized use in the area can be expected. An increase in motorized use will likely result in user conflicts and a potential increase in harvest of all game species; however, moose antler and sheep horn restrictions and moose and caribou drawing permits already in place would prevent overharvest of those species.

**BACKGROUND:** Since its inception, the WRCUA in southcentral Unit 20A has had substantial use by hunters and guides who access the area by aircraft and horseback to hunt moose, sheep, caribou, and grizzly bear.

The WRCUA was established in 1976, and at that time included the Yanert drainage to the south and the Tanana Flats to the north. The purpose of creating this CUA was to reduce conflicts among ATV users, airplane users, and horse users. After the WRCUA was created, boats and aircraft were the only motorized access allowed for hunting. In 1977, the Tanana Flats portion was removed from the WRCUA. In 1983, the Yanert drainage also was removed and was made into the Yanert Controlled Use Area with year-round restrictions on the use of motorized vehicles for big game hunters, except aircraft. That same year, the WRCUA's current boundaries were adopted (with the exception that the boundary along the Wood River downstream from Snow Mountain Gulch was clarified in 2000) and the year-round restriction on motorized vehicles, except aircraft, in the WRCUA was scaled back to a restriction between August 1 and September 30 for the purpose of big game hunting.

A portion of the area covered under this proposal was opened to motorized access in 1998 after the board passed a proposal by the Middle Nenana Fish and Game Advisory Committee (AC). By 2000, the same AC proposed that vehicle restrictions be reinstated in that area and the board passed their proposal. This proposal would allow motorized access over a much larger portion of Unit 20A than the previous change and would likely result in many user conflicts between motorized land vehicles, aircraft, and non-motorized users.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocation issue. The WRCUA was put into place to address user conflicts among hunters using different modes of transportation and should therefore be determined by the board.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 128 – 5AAC 92.540(3)(F) Wood River Controlled Use Area.** Modify the boundary of the Wood River Controlled Use Area in Unit 20A.

**PROPOSED BY:** Jonathan and Andrew Talerico

**WHAT WOULD THE PROPOSAL DO?** The proposed change would remove a portion of the WRCUA.

The proposed change would move the northwestern boundary of the WRCUA from the Totatlanika River to the Tatlanika Creek (Fig. 128-1). This would decrease the overall area of the WRCA from 1,172 square miles to 951 square miles, a reduction of about 19%. The new boundary would be as follows:

The area consists of that portion of Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the east bank of the Tatlanika Creek, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of the Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Last Chance Creek, then along the east bank of Last Chance Creek to the confluence of Last Chance Creek and Moose Creek, then along the east bank of Moose Creek to the confluence of Moose Creek and the Tatlanika Creek, and then along the east bank of the Tatlanika creek to the Rex Trail.



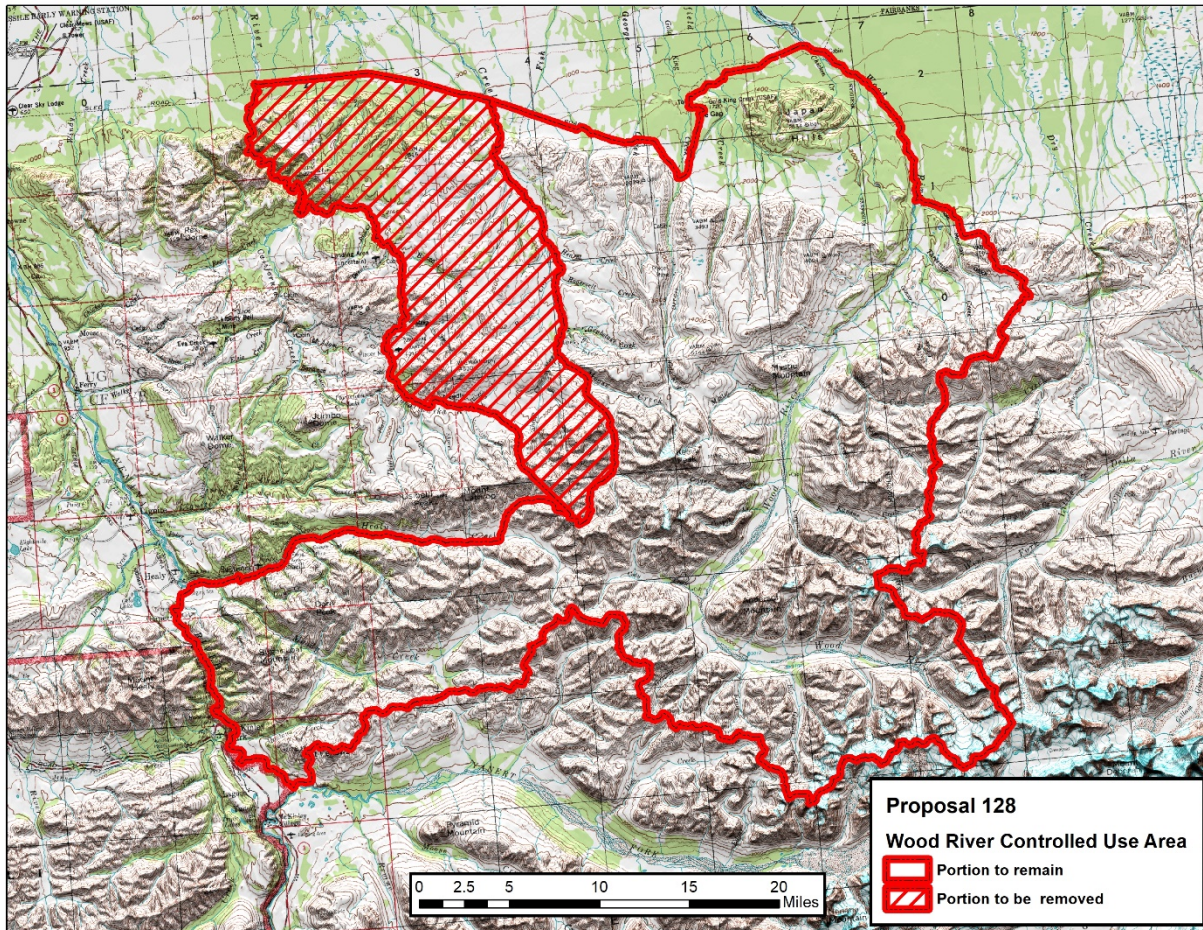


Figure 128-1. Proposed boundary change for the Wood River Controlled Use Area. Crosshatch area is proposed to be removed.

**WHAT ARE THE CURRENT REGULATIONS?** The WRCUA is closed to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through September 30; however, this provision does not prohibit motorized access via, or transportation of game on, the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption.

The WRCUA consists of that portion of Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along

the east bank of Dexter Creek to the Totatlanika River, and then down the east bank of the Totatlanika River to the Rex Trail;

The WRCUA is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

If this proposal is adopted, a substantial increase of motorized use in the area can be expected. An increase in motorized use will likely result in user conflicts and a potential increase in harvest of all game species; however, moose antler and sheep horn restrictions and moose and caribou drawing permits already in place would prevent overharvest of those species.

**BACKGROUND:** Since its inception, the WRCUA in southcentral Unit 20A has had substantial use by hunters and guides who access the area by aircraft and horseback to hunt moose, sheep, caribou, and grizzly bear.

The WRCUA was established in 1976, and at that time included the Yanert drainage to the south and the Tanana Flats to the north. The purpose of creating this CUA was to reduce conflicts among ATV users, airplane users, and horse users. After the WRCUA was created, boats and aircraft were the only motorized access allowed for hunting. In 1977, the Tanana Flats portion was removed from the WRCUA. In 1983, the Yanert drainage also was removed and was made into the Yanert Controlled Use Area with year-round restrictions on the use of motorized vehicles for big game hunters, except aircraft. That same year, the WRCUA’s current boundaries were adopted (with the exception that the boundary along the Wood River downstream from Snow Mountain Gulch was clarified in 2000) and the year-round restriction on motorized vehicles, except aircraft, in the WRCUA was scaled back to a restriction between August 1 and September 30 for the purpose of big game hunting.

A portion of the area covered under this proposal was opened to motorized access in 1998 after the board passed a proposal by the Middle Nenana Fish and Game Advisory Committee (AC). By 2000, the same AC proposed that vehicle restrictions be reinstated in that area and the board passed their proposal. This proposal would allow motorized access over a much larger portion of Unit 20A than the previous change and would likely result in many user conflicts between motorized land vehicles, aircraft, and non-motorized users.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocation issue. The WRCUA was put into place to address user conflicts among hunters using different modes of transportation and should therefore be determined by the board.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 129 – 5 AAC 92.540(3)(H)(ii) Controlled Use Area.** Change the closure dates for the Yanert Controlled Use Area (YCUA) in Unit 20A to align with the Wood River CUA and clarify whether horse feed is considered “hunting gear”.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** Change the motorized closure dates of the Yanert CUA (YCUA) from year-round to 2 months.

**WHAT ARE THE CURRENT REGULATIONS?** The Yanert CUA is **closed year-round** to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game; however, this provision does not prohibit motorized access, or transportation of game, on the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption. The area contains that portion of Unit 20A drained by the Nenana River upstream from and including the Yanert Fork Drainage.

The Wood River Controlled Use Area (WRCUA) is **closed** to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game, **from August 1 through September 30**; however, this provision does not prohibit motorized access via, or transportation of game on, the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption. The WRCUA consists of that portion of Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along the east bank of Dexter Creek to the Totatlanika River, and then down the east bank of the Totatlanika River to the Rex Trail.

The YCUA and WRCUA are entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would allow motorized vehicle access for big game hunters in the Yanert CUA during October through July, which aligns with the Wood River CUA. Motorized use could include hauling big game hunting gear to camps prior to August and hauling gear out of camps after September. This proposed change is unlikely to significantly change current harvest levels because the August and September access restrictions would still be in place; however, the full extent of this proposed change is unknown.

**BACKGROUND:** Most hunters and guides have accessed the YCUA in southwestern Unit 20A by aircraft and horseback to hunt moose, sheep, caribou, and grizzly bear since its inception. However, some hunters walk from the Parks Highway.

The WRCUA was established in 1976 and included the Yanert drainage to the south and the Tanana Flats to the north. The purpose of creating this CUA was to reduce conflicts among ATV, airplane, and horse users. After the WRCUA was created, boats and aircraft were the only motorized access allowed for hunting. In 1977, the Tanana Flats portion was removed from the WRCUA. In 1983, the Yanert drainage also was removed and was made into the Yanert Controlled Use Area with year-round restrictions on the use of motorized vehicles for big game hunters, except aircraft. That same year, the WRCUA's current boundaries were adopted (with the exception that the boundary along the Wood River downstream from Snow Mountain Gulch was clarified in 2000) and the year-round restriction on motorized vehicles, except aircraft, in the WRCUA was scaled back to a restriction between August 1 and September 30 for the purpose of big game hunting.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocation issue. If hunting pressure increases significantly, the current strategy of moose antler and sheep horn restrictions and moose and caribou drawing permits already in place would prevent overharvest of those species. If the board intends to define "hunting gear" and/or "gear" the department recommends the board do so on a statewide basis.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 130 – 5 AAC 92.104 Authorization for methods and means disability exemptions and 5 AAC 92.540(3)(H) Controlled Use Areas.** Disallow the issuance of methods and means disability exemption permits for the Yanert Controlled Use Area (YCUA) in Unit 20A.

**PROPOSED BY:** Tom Malapanis

**WHAT WOULD THE PROPOSAL DO?** Change the regulation to prohibit the issuance of methods and means exemption permits within the YCUA.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.104. Authorization for methods and means disability exemptions**

(a) A person with a disability, or their personal representative, may submit an application on a form available from the department for an exemption from a methods and means requirement set out in this chapter. The application must

- (1) include a signed statement from a licensed physician explaining the nature and extent of the person's disability;
- (2) specifically identify the methods and means limitation at issue and the type of exemption requested;
- (3) include a statement by the person with a disability that explains the causal relationship between the disability and the requested accommodation, or how the regulation at issue prohibits meaningful access to a program, service or benefit; and



(4) be submitted at least 30 days before the requested effective date of the exemption, unless the exemption is being requested as a result of an emergency order or emergency regulation.

(b) The department shall issue a special authorization in writing that grants the requested exemption or an alternate exemption, if it determines that the exemption would provide a person with a disability with meaningful access to the program, service, or benefit in question, and meets the standard set out in this section. In granting the exemption, the department may include any conditions it determines are reasonable to conform the exemption to existing conservation and management objectives. In considering whether to grant the exemption, the department shall consider, among other factors, whether the exemption would

- (1) fundamentally alter a program, service or benefit of the department;
- (2) place an undue administrative burden or expense on the department;
- (3) have an unreasonable impact on the conservation, development, or utilization of game; or
- (4) constitute an unreasonable risk to public health or safety.

(c) The department may require a hunter or trapper who receives an exemption under this section to be accompanied by another hunter or trapper who has a valid hunting and trapping license and is capable of retrieving game.

(d) The department will not authorize an exemption under this section

- (1) if the regulation does not substantially prohibit the person from meaningful access to the program, service, or benefit;
- (2) that would allow exemption or modifications to seasons or bag limits; or
- (3) for any accommodation if the Board of Game has previously reviewed and acted on the same request.

(e) Notwithstanding any other provision in this title, the department may issue a permit to take brown bears with the use of bait during established seasons and with established bag limits to an applicant who qualifies for the hunt and meets the requirements of (a) and (b) of this section, and who is permanently wheelchair-bound or similarly disabled to the extent that use of bait is the only reasonable option the applicant has to harvest a brown bear.

**5 AAC 92.540(3)(H) Controlled Use Areas.** The Yanert Controlled Use Area:

That portion of Unit 20A drained by the Nenana River upstream from and including the Yanert Fork Drainage. The area is closed to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game; however, this provision does not prohibit motorized access, or transportation of game, on the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption.



Species	Unit/Area	Special instructions
Black bear	Unit 20A, Yanert Controlled Use Area	Closed to the use of any motorized vehicle, except aircraft, for big game hunting
Brown/Grizzly bear		
Caribou		
Moose		
Sheep		
Wolf		
Wolverine		
Small game		No restrictions on motorized vehicle use for small game hunting

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would prohibit the department from issuing methods and means exemption permits authorizing motorized access into the YCUA. This would limit hunting opportunity for disabled hunters in this area.

**BACKGROUND:** The Americans with Disabilities Act requires the State of Alaska to make reasonable modifications when the modifications are necessary to avoid discrimination on the basis of disability, unless the modification would fundamentally alter the nature of the program or activity.

Methods and means exemption permit applications are evaluated by ADF&G on a case by case basis. If ADF&G determines reasonable opportunities exist for hunters to harvest an animal outside of a motorized-restricted area then the request may be denied. To determine this, staff assess the situation temporally and spatially by determining if a portion of the hunt area is outside of the controlled use area, or if the controlled use area is not in effect for the entire duration of the hunt. Staff from ADF&G review applications for completeness, including detailed information about which species, hunt numbers, area and exemption(s) are being requested. The applicant must explain and certify how their physical condition limits their ability to participate in the hunt without receiving an exemption. This statement is compared to the description provided by a licensed medical doctor, describing and certifying the nature and extent of the condition or disability. The medical doctor then indicates whether this is a permanent disability, ultimately determining the effective period of the exemption. Alaska residents with a permanent disability can be granted a 5 year exemption and Alaska residents with non-permanent disabilities can be granted exemptions for 1 calendar year. All nonresident exemptions that are granted, regardless of disability type, are for 1 calendar year.

The YCUA is closed year-round to motorized travel for big game hunters. While methods and means exemption requests for motorized access into motorized-restricted areas are rare (~5 requests/year statewide), the issuance of these exemptions has created user conflicts between people accessing the area via non-motorized transportation and those with a methods and means exemption permit.

The YCUA was originally part of the Wood River CUA (WRCUA), which was established in 1976. The purpose of the WRCUA was to reduce conflicts among ATV, airplane, and horse users. After the WRCUA was created, boats and aircraft were the only motorized access allowed

for hunting. In 1983, the Yanert drainage was removed and was made into the YCUA with year-round restrictions on the use of motorized vehicles for big game hunters, except aircraft.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocation issue, and supports providing hunting opportunity to all Alaskans. There is no evidence to suggest there is a biological concern for any of the species hunted within the YCUA. However, the department asks that this proposal be deferred to the 2021 statewide meeting. This issue goes beyond these exemptions in the YCUA and therefore should be addressed at the statewide meeting so the language and criteria for this exemption permit can be consistent across the state. The department will continue to evaluate each request on a case-by-case basis using consistent and standardized criteria for determining eligibility.

*Note: The Americans with Disabilities Act requires the State of Alaska to make reasonable modifications when the modifications are necessary to avoid discrimination on the basis of disability, unless the modification would fundamentally alter the nature of the program or activity.*

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 131 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.**  
Limit the use of off-road vehicles for moose hunting in Unit 20A.

**PROPOSED BY:** Leroy Sutton.

**WHAT WOULD THE PROPOSAL DO?** The proposed change would make it illegal to hunt moose on the same day you have operated or were conveyed by an off-road vehicle in Unit 20A.

**WHAT ARE THE CURRENT REGULATIONS?** There are currently no regulations prohibiting hunting moose on the same day you have operated or were conveyed in an off-road vehicle in Unit 20A.

**5 AAC 92.004. Policy for off-road vehicle use for hunting and transporting game**

(a) Off-road vehicles are a legitimate method of transporting hunters and game in the state, subject to requirements of federal, state, and local landowners. If the Board of Game, through its public process, finds that off-road vehicle use attributed to hunting activities in a specific area has resulted or is likely to result in one or more of the following conditions, it will, in its discretion, take action to avoid or minimize the conditions:

- (1) soil erosion or compaction, or vegetative changes, significantly affecting important wildlife habitat, including wildlife food sources such as fish and fish streams, or wildlife distribution or abundance;
- (2) harvest of a population, sex, or age class significantly affecting condition, abundance, or trophy size relative to area management goals;
- (3) wildlife disturbance significantly affecting reproductive success, abundance, or

condition; movement patterns, distribution, or behavior; or avoidance of important habitats such as mineral licks, birthing sites, wintering habitat, or fish spawning, incubation, and rearing sites, and other wildlife feeding sites and food sources; (4) chronic conflicts with other user groups leading to a decline in the quality of the outdoor experience.

(b) The provisions of (a) of this section do not prevent the board from taking other action that it considers necessary or advisable to adopt or modify off-road vehicle regulations that might affect hunting or the transportation of hunters, hunting gear, or game.

(c) In this section, “off-road vehicle” includes four-wheel drive trucks and automobiles, motorcycles, three- to eight-wheeled all-terrain recreation and utility vehicles, vehicles with two tracks, air-cushioned vehicles, and airboats operated outside of a navigable waterway.

Intensive management (IM) of moose in Unit 20A was adopted by the board because this population is important for providing high levels of harvest for human consumptive uses. The IM population objective is 10,000–15,000 and the harvest objective is 500–900 moose.

The current moose hunts in Unit 20A include a harvest ticket bull hunt with antler restrictions, antlerless drawing and registration hunts, and 8 any-bull drawing hunts (7 in various portions of Unit 20A during September and 1 by muzzleloader during November–December).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If the proposed changes were adopted it would be illegal to hunt moose in Unit 20A on the same day the hunter operated an off-road vehicle or was transported by an off-road vehicle. Hunters would have to wait to hunt moose until after 3:00 am the day after they operated the vehicle or were transported by off-road vehicle. If this proposal is adopted little impact to current harvest levels is anticipated.

**BACKGROUND:** Motorized vehicle access is allowed in Unit 20A outside of non-motorized areas (Wood River Controlled Use Area and Yanert Controlled Use Area) and is by far the most popular way to hunt moose. Off road vehicles and 4 wheelers accounted for 55% of the transportation methods used to hunt moose in Unit 20A during regulatory years 2014 through 2018. Over the same period, other methods used included highway vehicles (20%), airplanes (11%), snowmachines (6%), horses (3%), and hunted on foot (both at 2%).

The most recent population survey estimate of 12,315 moose was within the IM population objective of 10,000–15,000, and the average harvest of 589 moose during RY14–RY18 was also within the IM harvest objective. The bull-to-cow management objective for Unit 20A (30 bulls to 100 cows) has been maintained.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding the allocative aspects of this proposal. Under the current land access regulations, the department has no biological concerns regarding the moose population in Unit 20A. However, the proposed change could result in decreased moose harvest. If the harvest falls below the IM harvest objective of 500 moose/year, the department may have to request that the board increase the season length or increase drawing permits in order to meet this objective. ATV use is restricted in some controlled use areas, this proposal provides an interesting concept to treat them similar

to aircraft, which allows them to be used to access areas, but not to actually hunt.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 132– 5 AAC 85.045 Hunting seasons and bag limits for moose.**

Shorten the moose hunting season in Units 20A and 20C

**PROPOSED BY:** Wayne Valcq

**WHAT WOULD THE PROPOSAL DO?** This proposal would shorten the moose season in Units 20A and 20C by 5 days at the end of the season(s).

**WHAT ARE THE CURRENT REGULATIONS?** Seasons and bag limits in Unit 20A vary. Harvest ticket hunts, drawing permit hunts and registration hunts are all available for moose in Unit 20A. The moose bag limit also varies in Unit 20A depending on which portion of the unit a person wishes to hunt. Unit 20C only has a harvest ticket moose season.

**Unit 20A Harvest Ticket Season**

Residents:

- One bull with Spike/Fork or 50-inch antlers or antlers with at least 3 or 4 brow tines (depending on area) on one side, September 1–25

Nonresidents:

- One bull with 50-inch antlers or antlers with 4 or more brow tines on one side, September 1–25

**Unit 20A Drawing Permits**

Residents and Nonresidents

- One bull, September 1–25
- One antlerless moose, August 15–November 15

**Unit 20A Registration Permits**

Residents

- One antlerless moose, October 1–February 28

**Unit 20C Harvest Ticket Season**

Residents:

- One bull, September 1–25

Nonresident:

- One bull with 50 inch antlers or antlers with 4 or more brow tines on one side, September 1–25

Both Units 20A and 20C have positive findings for intensive management (IM). The Unit 20A IM population objective is 10,000–15,000 moose and the harvest objective is 500–900 moose.

The Unit 20C IM population objective is 3,000–4,000 moose and the harvest objective is 150–400 moose.

There is a positive C&T finding for moose in Unit 20A outside the Fairbanks Nonsubsistence Area, with an ANS of 50–75 moose. There is also a positive C&T finding for moose in Unit 20C in combination with Unit 20F, with ANS of 100–130 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would shorten the moose season(s) in Units 20A and 20C by 5 days. It is unknown if the intent of this proposal is for all moose hunts or just a harvest ticket season. This proposal would decrease hunting opportunity and likely decrease harvest in these areas.

**BACKGROUND:** Harvest in Units 20A and 20C meet IM harvest objectives set by the board. In Unit 20A, the combination of harvest ticket hunts for bulls, any-bull drawing hunts, and antlerless hunts help to provide maximum hunter opportunity and contain growth of this nutritionally stressed moose population. The department estimated 3,800 moose in Unit 20C during the last survey in 2011. Hunter access is limited in Unit 20C. Large fires in Unit 20C since 2010 have created several hundred thousands of acres of good habitat throughout the unit and the moose population is expected to increase in the area over the next 20 years.

The average annual moose harvest in Unit 20A during 2014–2018 was 536 moose. Of this average harvest, 269 bulls are harvested during the harvest ticket hunt while the remaining harvest in Unit 20A comes from drawing permits for any bull and drawing permits for antlerless moose. In Unit 20C, the average annual harvest during 2014–2018 was 163 moose. All of this harvest occurs during the harvest ticket hunt.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal. This proposal would reduce the season length by 20% and would likely reduce harvest by 20% or more. This would likely reduce that average annual harvest in both units below the IM harvest objective even though both units have a population size and harvestable surplus that supports the current harvest. Because these units have maintained bull-to-cow ratios above 25 bulls per 100 cows, the department has no concerns about overharvesting moose in this area.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 133 – 5 AAC 85.045. Hunting seasons and bag limits for moose.**

**5 AAC 92.530. Management areas.** Establish the Stampede Trail Management Area in Unit 20C for archery and muzzleloader hunting only.

**PROPOSED BY:** Middle Nenana River Fish & Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a management area around the Stampede Trail in Unit 20C that would only allow hunting by archery or muzzleloader.

**WHAT ARE THE CURRENT REGULATIONS?** In the proposed area there are no restrictions on the use of firearms, shotguns, bow and arrows, crossbows, or muzzleloaders for the taking of game except the standard restrictions applied to legal equipment for hunting in all game management units.

Unit 20C has a positive finding for Intensive Management (IM). The IM population objective is 3,000–4,000 moose outside Denali National Park and Preserve and an IM harvest objective of 150–400 moose.

There is a positive C&T finding for moose in Unit 20C combined with 20F, with an ANS of 100–130 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would eliminate the opportunity to hunt in this area by any method except archery equipment or muzzleloaders.

**BACKGROUND:** The proposed area, which includes the Stampede Trail, is an area that has a long historical use by hunters. The area is surrounded on 3 sides by Denali National Park land. The area is popular among moose, bear (black and brown), wolf, and small game hunters. The department does not have the means to quantify the total number of hunters using the area. The total number of small game hunters, brown bear hunters, and wolf hunters is unknown because there is no reporting requirement for any of these species if the hunter is unsuccessful.

It is likely that moose hunting (September 1–25) is the most popular hunting activity in this area. During 2017 and 2018, an average of 150 hunters/year reported using the proposed area to hunt moose. Reported moose harvest was 39 in 2017 and 39 in 2018. During that period, 5 grizzly bears were sealed, and 4 black bear bait stations were registered in the area. It is important for the board to consider that the IM population and harvest objective are currently being met; however, this proposal may reduce harvest enough to bring the 20C harvest below the IM harvest objective.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue and there is no conservation concern in the area. If adopted, this proposal would eliminate hunting opportunity for all hunters except those that are certified with archery or muzzleloader equipment. It would also likely reduce harvest of all species in the area. If adopted, this proposal would reduce subsistence opportunity in Unit 20C; the board may wish to evaluate if reasonable opportunity would still be provided in these units if the proposal is adopted.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 134 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a resident youth hunt for moose in Unit 20C.

**PROPOSED BY:** Paul Nyberg

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a resident moose season for youth hunters with season dates of August 25–August 31 and a bag limit of one bull.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20C Harvest Ticket

Residents:

- One bull September 1–25

Nonresident:

- One bull with 50-inch antlers or antlers with 4 or more brow tines on one side, September 1–25

Unit 20C has a positive finding for Intensive Management (IM). The IM population objective is 3,000–4,000 moose and the harvest objective is 150–400 moose.

There is a positive C&T finding for moose in Unit 20C with an ANS of 100–130 moose.

"Youth hunt" means a hunt limited to a child aged 10 to 17 and an accompanying adult; if the child is a

(A) resident, the accompanying adult may be any licensed resident hunter 21 years of age or older;

(B) nonresident, the accompanying adult must be a licensed resident hunter 21 years of age or older who is a parent, stepparent, or legal guardian of the child.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would create a resident moose season for youth hunters with the season dates of August 25–31 with a bag limit of one bull. Youth hunts for residents are limited to youth hunters age 10–17 and an accompanying adult that is a licensed resident hunter 21 years of age and older. The bag limit of one bull would count towards the bag limit for both the youth and the accompanying adult. Because this season is early, when moose hunting is more difficult, and because of the type of flat terrain that exists in Unit 20C, it is likely that harvest would be fewer than 20 moose if the hunt was adopted.

**BACKGROUND:** Unit 20C is has a low-density moose population and most of the unit is not accessible from the road system. The department estimated 3,800 moose in Unit 20C during the last survey in 2011. Large fires in Unit 20C since 2010 have created several hundred thousand acres of good habitat throughout the unit and the moose population is expected to increase in the area over the next 20 years. During 2014–2018 an average of 163 moose were harvested annually.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue and there is no biological concern regarding this moose population. This said the Department supports creation of youth hunts as a means to pass on hunting traditions.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 135 – 5 AAC 85.045(18). Hunting seasons and bag limits for moose.** Shorten the moose season by 5 days in a portion of Unit 20B.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal would revert the harvest ticket moose season to pre-2011 season dates by shortening the season by 5 days in much of Unit 20B. The season dates would be September 1–15 for residents and September 5–15 for nonresidents. The bag limit would remain one bull moose.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B, that portion of the Salcha River drainage downstream of Goose Creek and upstream and including Butte Creek (within the Fairbanks Nonsubsistence Area):

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Unit 20B, that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson Highway (within the Fairbanks Nonsubsistence Area)

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Remainder of Unit 20B (outside the Fairbanks Nonsubsistence Area)

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in this portion on Unit 20B.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would shorten the moose season by 5 days and would likely decrease the annual bull moose harvest in the area.

**BACKGROUND:** The bull-to-cow ratio has been declining in accessible portions of Unit 20B since 2015. Unit 20B has a management objective to maintain a bull-to-cow ratio of 30 bulls per 100 cows. The 2017 survey showed 17 bulls per 100 cows, an indication that the harvest of bull moose is likely too high. After providing this information to, and gaining support from the local advisory committees, emergency orders were issued in July 2018 and 2019 to shorten this season



to the proposed dates to improve the bull-to-cow ratio in these portions of Unit 20B, and the dates updated in the regulation summary.

Prior to 2011, these portions of Unit 20B had a September 1–15 moose season for residents and a September 5–15 season for nonresidents. In 2011, the board lengthened the season to September 1–20 for residents and September 5–20 for nonresidents as part of a management strategy to decrease the moose population. At the time, this population was above the IM population objective of 12,000–15,000 moose and was likely to exceed habitat capability if measures were not taken to bring the population to a level more appropriate for the available habitat. Furthermore, the harvestable surplus of bulls was high enough at that time to provide more harvest opportunity.

The moose population has since decreased to 12,871 moose, a more appropriate level for the available habitat. Returning the moose season to the pre-2011 dates during the coming regulatory year is likely to alleviate the low bull-to-cow ratio and allow it to return to the objective of 30 bulls per 100 cows.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. There is a conservation concern with the bull-to-cow ratio being below the objective. To increase this ratio the hunting season needs to be shortened. The board may wish to consider whether reducing the season dates by 5 days will continue to provide reasonable opportunity for success in moose hunting for subsistence uses in Unit 20B Remainder, outside the Fairbanks Nonsubsistence Area.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 136 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Extend the nonresident hunting season for moose in Unit 20B Remainder.

**PROPOSED BY:** Ken Wenger

**WHAT WOULD THE PROPOSAL DO?** This proposal would lengthen the nonresident moose season from September 5–15 to September 1–15.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B, that portion of the Salcha River drainage downstream of Goose Creek and upstream and including Butte Creek

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Unit 20B, that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson Highway

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose

- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Remainder of Unit 20B

- Residents, by harvest ticket, September 1–20 with a bag limit of one bull moose
- Nonresidents, by harvest ticket, September 5–20 with a bag limit of one bull moose.

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in this portion of Unit 20B.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would increase the nonresident moose season by 5 days and would likely increase the nonresident harvest.

**BACKGROUND:** The bull-to-cow ratio has been declining in the accessible portions of Unit 20B since 2015. Unit 20B has a management objective to maintain a bull-to-cow ratio of 30 bulls per 100 cows. The 2017 survey showed 17 bulls per 100 cows, an indication that the harvest of bull moose was likely too high. After providing this information to, and gaining support from the local advisory committees, emergency orders were issued in July 2018 and 2019 to shorten the season dates to improve the bull-to-cow ratio in these portions of Unit 20B; Sept 1-Sept 15 for resident hunters and Sept 5-Sept 15 for nonresident hunters.

Prior to 2011, these portions of Unit 20B had a September 1–15 moose season for residents and a September 5–15 season for nonresidents. In 2011, the board lengthened the season to September 1–20 for residents and September 5–20 for nonresidents as part of a management strategy to decrease the moose population. At the time, this population was above the IM population objective of 12,000–15,000 moose and was likely to exceed habitat capability if measures were not taken to bring the population to a level more appropriate for the available habitat and the harvestable surplus of bulls was high enough at that time to provide more harvest opportunity.

The moose population has decreased to 12,871 moose, which is a more appropriate level for the available habitat. The department has submitted a proposal (Proposal 135) to return the moose season to the pre-2011 dates to alleviate the low bull-to-cow ratio and allow it to return to the objective of 30 bull per 100 cows.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal. Increased harvest is a conservation concern because the bull-to-cow ratio is already below the objective. Increasing harvest would be counterproductive to efforts to increase the bull-to-cow ratio in Unit 20B. At this time the department is proposing to shorten Unit 20B moose seasons and this proposal would increase the season for nonresidents.

Although the low bull-to-cow ratio in Unit 20B warrants limiting bull harvest to improve that ratio, the board may wish to consider whether extending the length of the nonresident season and offering simultaneous resident and nonresident opportunity reduces reasonable opportunity for subsistence users.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 137 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate the muzzleloader registration moose permit hunt RM782 in Unit 20B.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would eliminate moose hunt RM782, which is a muzzleloader only moose hunt for one bull moose in a remote portion of Unit 20B.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B:

The drainage of the Middle Fork of the Chena River and the Salcha River drainage upstream from and including Butte Creek

Residents Only

- One bull by registration permit RM782 (by muzzleloader only), November 10–December 10

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in Unit 20B. This hunt occurs entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, hunters could no longer to pursue a late season bull moose with a muzzleloader in this portion of Unit 20B. Adoption of this proposal would reduce opportunity to take moose in this portion of Unit 20B.

**BACKGROUND:** The registration moose hunt RM782 began in 2011 as a drawing permit for any moose. During 2011–2014, only 2 moose were harvested. The hunt was then changed to a registration permit beginning in 2015 and the bag limit was changed to one bull moose. An average of 12 hunters/year participated in the registration hunt during 2015–2018 and no moose have been harvested. The hunt area for RM782 is remote and travel into the area is difficult, especially with warmer fall temperatures and later freeze-up.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocation issue. No conservation concerns are addressed or would result from adoption of this proposal.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional cost to the department.

\*\*\*\*\*

**PROPOSAL 138 – 5 AAC 5 AAC 85.045. Hunting seasons and bag limits for moose.**

Create a fall archery and muzzleloader hunt for moose in Unit 20B Remainder.

**PROPOSED BY:** Dane Happ

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a 5-day archery and muzzleloader moose season in the remainder of Unit 20B after the regular bull moose season.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B Remainder (The road system and more accessible areas in Unit 20B)

1 bull,

**Residents Sept. 1–Sept. 20\***

**Nonresidents Sept. 5–Sept. 20\***

*\*Note: ADF&G issued emergency orders in 2018 and 2019 to shorten the moose hunting season to end September 15 in Unit 20B Remainder due to conservation concerns with the low bull-to-cow ratio in Unit 20B, and updated the regulation summary to show the revised dates.*

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in Unit 20B Remainder.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would create a late moose hunting season for both archery and muzzleloader hunters, giving archery and muzzleloader hunters 5 more days to hunt moose in Unit 20B Remainder. This would increase the harvest of moose in Unit 20B Remainder.

**BACKGROUND:** The bull-to-cow ratio has been declining in the accessible portions of Unit 20B since 2015. Unit 20B has a management objective to maintain a bull-to-cow ratio of 30 bulls per 100 cows. The 2017 survey showed 17 bulls per 100 cows, an indication that the harvest of bull moose is likely too high. After providing this information to, and gaining support from, the local advisory committees, emergency orders were issued in July 2018 and 2019 to shorten the season to improve the bull-to-cow ratio in this portion of Unit 20B.

Prior to 2011, this portion of Unit 20B had a September 1–15 moose season for residents and a September 5–15 season for nonresidents. In 2011, the board lengthened the season to September 1–20 for residents and September 5–20 for nonresidents as part of a management strategy to decrease the moose population. At the time, this population was above the IM population objective of 12,000–15,000 moose and was likely to exceed habitat capability if measures were not taken to bring the population to a level more appropriate for the available habitat. Furthermore, the harvestable surplus of bulls was high enough at that time to provide more harvest opportunity.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal because of conservation concerns. Due to the low bull-to-cow ratio in Unit 20B remainder, the department is trying to reduce the harvest of bull moose in Unit 20B Remainder. Proposal 135 was submitted by the department to reduce the season length in an attempt to reduce harvest and allow the bull-to-cow ratio to recover. Allowing additional harvest at this time would be counterproductive to this goal.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional cost to the department.

\*\*\*\*\*

**PROPOSAL 139 – 5 AAC 5 AAC 85.045. Hunting seasons and bag limits for moose.** Allow muzzleloader hunting in addition to the archery hunt in the drainage of the Middle Fork of the Chena River in Unit 20B.

**PROPOSED BY:** Dane Happ

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the archery only moose season in a portion of Unit 20B to allow the use of a muzzleloader.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B, Drainage of the Middle Fork of the Chena River

Residents and Nonresidents

- One bull by bow and arrow only, September 26–30

Refer to the *2019–2020 Alaska Hunting Regulations* for additional moose hunting seasons in this area.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would likely increase the number of moose harvested during the September 26–30 moose season.

**BACKGROUND:** This proposal will likely not increase harvest significantly in this remote portion of Unit 20B. The harvest ticket archery-only hunt in the drainage of the Middle Fork of the Chena River has been in place for many years. The hunt exists because there are a low number of participants and harvest is low. During 2014–2018 only 2 moose were reported harvested during this hunt period.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue at this time. It is unknown how the participation would change if this proposal

was adopted and harvest from the hunt would have to be monitored to determine if the hunt was sustainable. Due to the remote nature of this area, it is likely that participation would be low and that harvest would be fewer than 5 moose annually.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 140 – 5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20B.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** Reauthorize antlerless moose hunting seasons in Unit 20B.

**WHAT ARE THE CURRENT REGULATIONS?** Antlerless moose hunts are available in Unit 20B by drawing, registration, or targeted permit only, as follows:

Creamer’s Field within the Fairbanks Management Area

Residents and nonresidents:

- 1 antlerless moose by drawing permit, by bow and arrow only, up to 150 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, September 1–November 27;
- 1 antlerless moose by muzzleloader by drawing permit, up to 10 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, Dec. 1–January 31.

Remainder of the Fairbanks Management Area

Residents and nonresidents:

- 1 antlerless moose by drawing permit, by bow and arrow only, up to 150 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, September 1–November 27.

Residents only:

- 1 moose by targeted permit by shotgun, crossbow or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Minto Flats Management Area

Residents only:

- 1 antlerless moose by registration permit, October 15–February 28.

Middle Fork of the Chena River drainage

Residents only:

- 1 antlerless moose by drawing permit, up to 300 permits, taking of calves or cows with calves is prohibited, August 15–November 15;
- 1 antlerless moose by registration permit, taking of calves or cows with calves is prohibited, October 1–February 28.

Southeast of the Moose Creek dike within ½ mile each side of the Richardson Highway

Residents only:

- 1 moose by drawing permit, by bow and arrow, crossbow, or muzzleloader, up to 100 permits, September 16–February 28;
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Remainder of Unit 20B

Residents only:

- 1 antlerless moose by drawing permit, by youth hunt only, up to 200 permits, August 5–14;
- 1 antlerless moose by drawing permit, up to 1,500 permits, taking of cows with calves is prohibited, August 15–November 15;
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Hunts for bull moose are also available in Unit 20B. Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about moose hunting seasons in Unit 20B.

Unit 20B has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B, within the Minto Flats Management Area, with an ANS of 20–40 moose.

There is a positive C&T finding for moose in Unit 20B, outside the boundaries of the Minto Flats Management Area and outside the boundaries of the Fairbanks Nonsubsistence Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Antlerless hunts will continue to be available to hunters, and the department will continue to have the authority to use antlerless hunts as a tool to regulate the moose populations.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The department's goal in Unit 20B 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, provide hunting opportunity, help meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless hunts are not reauthorized, subsistence hunters in the portion of Unit 20B outside the Fairbanks Nonsubsistence Area may not have a reasonable opportunity to pursue moose for subsistence uses. Many different antlerless hunts have been implemented over the last 10 years in Unit 20B. Currently the moose population is estimated to be within the Intensive Management objective of 12,000–15,000 moose, therefore the necessity for antlerless harvest is minimal and fewer hunts are offered at this time. The antlerless hunts that are currently offered are as follows:

*Fairbanks Management Area (FMA)* – The purposes of these antlerless hunts are to regulate population growth in the urban and suburban Fairbanks area to potentially reduce moose–vehicle collisions and moose–human conflicts.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose–human conflicts continue to place significant demands on property owners. To increase hunting opportunity and harvest and to reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during Regulatory Year 1999 (RY99; that is, RY = 1 July 1999 through 30 June 2000) through RY10. Moose–vehicle collisions and moose–human conflicts declined during RY06–RY19, presumably, in part due to the consistent antlerless moose harvests during RY09–RY19.

*Minto Flats Management Area (MFMA)* – The primary purposes of this antlerless hunt are to provide a reasonable opportunity for subsistence uses and to regulate the moose population in the MFMA.

The MFMA moose density was high in 2010 (4.1 moose/mi<sup>2</sup>). In order to reduce the moose population, harvest of antlerless moose during RY12 and RY13 was about 2.5% of the population. The fall 2013 estimate showed a more sustainable density (2.6 moose/mi<sup>2</sup>) in the MFMA. The 2017 estimate now indicates densities are at approximately 1.7 moose/mi<sup>2</sup>. The antlerless harvest in this area is intended to stabilize this population, therefore we intend to only harvest antlerless moose at about 1% of the total population to maintain the current population size.

*Targeted Hunts* – The purpose of the targeted hunts is primarily to reduce moose–vehicle collisions and moose–human conflict near schools, neighborhoods, and roads by harvesting moose that habitually spend time along roadways and have a high likelihood of being injured by highway vehicles or have already been injured. We also use targeted hunts as an option for resolving moose–human conflict situations. These permits are used sparingly but allow the public to harvest specific moose instead of the department dispatching them.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with the harvest of antlerless moose taken under these regulations in these hunt areas; however, elimination of these hunts would create a biological concern as the population grows beyond capability of its habitat. The board may also wish to consider whether a reasonable opportunity for subsistence uses on populations with positive C&T findings would still be provided if these hunts were eliminated. The Unit 20B moose population has potential for growth due to the extensive burns (i.e., increased productivity) and high survival rates. If antlerless moose hunts are not reauthorized, the moose population may exceed carrying capacity and would require population reduction. These hunts



maintain the opportunity to hunt a harvestable surplus of cow moose, and help to meet IM harvest objectives.

**COST ANALYSIS:** Approval of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 141 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate registration moose permit hunt RM785, in the Minto Flats Management Area (MFMA) in Unit 20B.

**PROPOSED BY:** Tanana, Rampart, Manley Fish & Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the MFMA.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B MFMA antlerless moose hunt

Residents only:

- 1 antlerless moose by registration permit (RM785), October 15–Last day of February, unless closed by Emergency Order.

Unit 20B MFMA bull moose hunts

Residents:

- One bull by harvest ticket, August 21–27,
- or
- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side, by harvest ticket, September 8–25

Nonresidents:

- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side by drawing permit, September 8–25. Ten permits are issued.

There is a positive C&T finding for moose in Unit 20B within the Minto Flats Management Area, with an ANS of 20–40 moose.

Unit 20B has a positive finding for intensive management (IM) because the unit is important for providing high levels of harvest for human consumptive use. The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the Minto Flats Management Area, therefore a customary and traditional opportunity to harvest antlerless moose would be lost.

**BACKGROUND:** The MFMA has consistently held one of the highest densities of moose in Unit 20B. At a density of 2–2.5 moose per square mile, this moose population is at a level appropriate for the current habitat. The harvestable surplus of bull moose in the MFMA area is 100–125, while the harvestable surplus of antlerless moose is 20–30. This is above the ANS of 20–40.

To help stabilize this population at its current density, the department recommends antlerless moose harvest of 1–1.5% of the population. For regulatory year 2019 (RY19; that is, 1 July 2019 through 30 June 2020), the quota for the RM785 antlerless moose hunt is 20 moose. This will help stabilize the moose population so that it does not increase beyond what the habitat can support. The estimated harvestable surplus of antlerless moose during RY16–RY18 was 20–30 moose/year, the approximate harvest during each of those years. This antlerless harvest also contributes to the IM harvest objective for Unit 20B of 600–1,500 moose.

Ceremonial harvest and cultural education harvest in the MFMA is generally low (estimated at 4–5 moose annually). However, during RY18 an increase in this harvest (estimated at 10 moose) combined with antlerless harvest in subsistence permit hunt RM785 (which was also closed by Emergency Order) caused the department to limit ceremonial harvest and cultural education permits to bulls only during 5 December 2018 through 30 June 2019 because the RY18 harvestable surplus of cows had been taken.

In 2010, the density of moose in MFMA was estimated at about 4 moose per square mile. Twinning rates were low and browse removal rates in the area were high which indicates that moose density was too high. By increasing harvest to as much as 130 antlerless moose per year during RY12–RY15, the department reduced the moose population to prevent further density-dependent issues in this area.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because it is a reduction in opportunity to harvest an available surplus of moose. Antlerless moose hunts are a valuable tool the department has to reduce or maintain populations, provide subsistence opportunity (especially in a longer winter season), and to meet intensive management harvest levels. Antlerless harvest at current harvest rates, as managed by quota, is minimal and likely does not affect the population. If the population does begin to grow to inappropriate levels, then antlerless moose harvest would be crucial.

The board must provide reasonable opportunity for hunting moose in the MFMA under the requirements of the subsistence statute, unless that provision is inconsistent with sustainable management. Elimination of the RM785 hunt would challenge the department's ability to manage the moose population at appropriate levels and the board's ability to provide reasonable opportunity. Additionally, if ANS is consistently not met, the board may choose to evaluate whether reasonable opportunity is being provided through the current hunt structure. If this proposal is adopted, the board may wish to consider whether reasonable opportunity is being provided given that eliminating the registration hunt RM785 would be a reduction in subsistence opportunity.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 142 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate registration moose permit hunt RM785, in the Minto Flats Management Area (MFMA) in Unit 20B.

**PROPOSED BY:** Anna Frank

**WHAT WOULD THE PROPOSAL DO?** Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the MFMA.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B MFMA antlerless moose hunt

Residents only:

- 1 antlerless moose by registration permit (RM785), October 15–Last day of February, unless closed by Emergency Order.

Unit 20B MFMA bull moose hunts

Residents:

- One bull by harvest ticket, August 21–27, or
- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side, by harvest ticket, September 8–25

Nonresidents:

- One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side by drawing permit, September 8–25. Ten permits are issued.

Refer to the *2019–2020 Alaska Hunting Regulations* for bull moose hunting seasons in this area.

There is a positive C&T finding for moose in Unit 20B within the MFMA, with an ANS of 20–40 moose.

Unit 20B has a positive finding for intensive management (IM) because the unit is important for providing high levels of harvest for human consumptive use. The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would eliminate the antlerless moose winter hunt (RM785) in the Minto Flats Management Area, therefore a customary and traditional opportunity to harvest antlerless moose would be lost.

**BACKGROUND:** The MFMA has consistently held one of the highest densities of moose in Unit 20B. At a density of 2–2.5 moose per square mile, this moose population is at a level appropriate for the current habitat. The harvestable surplus of bull moose in the MFMA area is

100–125, while the harvestable surplus of antlerless moose is 20–30. This is above the ANS) of 20–40.

To help stabilize this population at its current density, the department recommends antlerless moose harvest of 1–1.5% of the population. For regulatory year 2019 (RY19; that is, 1 July 2019 through 30 June 2020), the quota for the RM785 antlerless moose hunt is 20 moose. This will help stabilize the moose population so that it does not increase beyond what the habitat can support. The estimated harvestable surplus of antlerless moose during RY16–RY18 was 20–30 moose/year, the approximate harvest during each of those years. This antlerless harvest also contributes to the IM harvest objective for Unit 20B of 600–1,500 moose.

Ceremonial harvest and cultural education harvest in the MFMA is generally low (estimated at 4–5 moose annually). However, during RY18 an increase in this harvest (estimated at 10 moose) combined with antlerless harvest in subsistence permit hunt RM785 (which was also closed by Emergency Order) caused the department to limit ceremonial harvest and cultural education permits to bulls-only during 5 December 2018 through 30 June 2019 because the RY18 harvestable surplus of cows had been taken.

In 2010, the density of moose in MFMA was estimated at about 4 moose per square mile. Twinning rates were low and browse removal rates in the area were high which indicates that moose density was too high. By increasing harvest to as much as 130 antlerless moose per year during RY12–RY15, the department reduced the moose population to prevent further density-dependent issues in this area.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because it is a reduction in opportunity to harvest an available surplus moose. Antlerless moose hunts are a valuable tool the department has to reduce or maintain populations, provide subsistence opportunity (especially in a longer winter season), and to meet intensive management harvest levels. Antlerless harvest at current harvest rates, as managed by quota, is minimal and likely does not affect the population. If the population does begin to grow to inappropriate levels, then antlerless moose harvest would be crucial.

The board must provide reasonable opportunity for hunting moose in the MFMA under the requirements of the subsistence statute, unless that provision is inconsistent with sustainable management. Elimination of the RM785 hunt would challenge the department’s ability to manage the moose population at appropriate levels and the board’s ability to provide reasonable opportunity. Additionally, if ANS is consistently not met, the board may choose to evaluate whether reasonable opportunity is being provided through the current hunt structure. If this proposal is adopted, the board may wish to consider whether reasonable opportunity is being provided given that eliminating the registration hunt RM785 would be a reduction in subsistence opportunity.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 143 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Eliminate all antlerless moose drawing hunts, including antlerless moose drawing hunts for youth, in Unit 20B except for the Minto Flats Management Area (MFMA).

**PROPOSED BY:** Anna Frank

**WHAT WOULD THE PROPOSAL DO?** If adopted this proposal would eliminate all drawing permits for antlerless moose in Unit 20B.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20B Drawing Hunts that Include Antlerless Moose in the Bag Limit:

Within the Fairbanks Management Area (DM788 archery only, DM786 archery only, Qualified Disabled Veterans only)

- One antlerless moose
- September 1–November 27
- Both hunts are open to residents and nonresidents

Within the Creamer’s Field Migratory Waterfowl Refuge (DM789)

- One antlerless moose by muzzleloader
- December 1–January 31
- Open to resident and nonresidents

Richardson Highway Corridor (DM783)

- One moose by bow and arrow, crossbow, or muzzleloader
- September 21–Last day of February
- Open to residents only

Unit 20B Target Hunt(AM751)

- One moose as determined by the department
- Announced when available
- Open to residents only

Refer to the *2019–2020 Alaska Hunting Regulations* for additional hunting seasons for bull moose in this portion on Unit 20B.

Unit 20B is identified by the board as being important for providing high levels of harvest for human consumptive use and has a positive finding for intensive management (IM). The IM population objective is 12,000–15,000 moose and the IM harvest objective is 600–1,500 moose.

There is a positive C&T finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would eliminate antlerless moose drawing permit hunts in the Fairbanks Management Area, Creamer’s Field Migratory Waterfowl Refuge, Richardson Highway

Corridor, and the Unit 20B target moose registration hunt. None of the other drawing hunts in the proposal are being administered at this time. This proposal would allocate all antlerless moose to ceremonial harvest in Unit 20B.

**BACKGROUND:** Antlerless moose hunts in Unit 20B help to make progress toward meeting the IM objectives for high levels of human consumptive use, and help to regulate this moose population, which has the ability to quickly outgrow the capability of its habitat. Because hunts currently utilized occur in populated areas, they also enhance public safety by reducing moose–vehicle collisions and moose–human conflicts.

The harvestable surplus of antlerless moose in central and western Unit 20B includes about 80 antlerless moose/year. If all of these antlerless moose are taken, this population will likely remain stable and nutritionally healthy. About 25 antlerless moose will likely be harvested from the MFMA under the registration hunt (RM785), approximately 35 antlerless moose will be harvested from the Fairbanks Management Area and Richardson Highway drawing permits (DM786, DM788, DM789 and DM783) and the remaining harvest (approximately 17 antlerless moose/year) is estimated to come from ceremonial harvest, cultural education permits and unreported harvest.

Only 4 antlerless moose drawing permit hunts are used at this time outside the MFMA. The Fairbanks Management Area and Creamer’s Field Migratory Waterfowl refuge have 3 drawing permit hunts that will yield an estimated 30–35 antlerless moose annually. These hunts are either archery only or muzzleloader only. Because these moose are harvested in the immediate Fairbanks area, moose–vehicle collisions and moose–human conflicts are reduced. The fourth drawing permit hunt is the Richardson Highway Corridor hunt (DM783). This hunt area includes ½-mile on each side of the Richardson Highway with a bag limit of any moose. The hunt is limited to archery, muzzleloader, and crossbow and is intended to reduce moose–vehicle collisions. The harvest is generally fewer than 10 antlerless moose. The remaining drawing permits listed in this proposal are not being used at this time; however, they are in codified for use if the moose population grows too large for the habitat to support.

In 2009, the population estimate for Unit 20B was approximately 20,000 moose. This was above the IM population objective and biological indicators showed that the moose population was too large for the habitat in this area. Antlerless moose hunts were administered throughout most of central and western Unit 20B to help reduce the population. Drawing permits were used for most of the road system portion of the unit and a registration hunt was used in MFMA. These permits helped reduce the population to a more appropriate level. By 2017, the population was within the IM population objective and at a more appropriate size for the amount of habitat available. As a result, most drawing permits for antlerless moose were eliminated.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal. The hunt structure in Unit 20B is set up to comply with the Intensive Management finding for the area. Antlerless hunts are used to provide hunting opportunity and to manage the moose population. Currently, only 4 of the 77 drawing permits listed by the proponent are being administered. Those 4 hunts all exist near the city of Fairbanks and are weapons restricted. These hunts provide hunting opportunity while reducing moose–human conflict and moose–vehicle collisions in populated areas. The other 73 drawing permits listed in the proposal have not been administered since 2017. The department would like to continue to keep these hunts available for use in the event

the moose population reaches a level in which cow harvest is needed to control population growth.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 144 – 5 AAC 85.045 Hunting seasons and bag limits for moose.** Shorten the antlerless moose seasons in Units 20A and 20B.

**PROPOSED BY:** Leonard Jewkes

**WHAT WOULD THE PROPOSAL DO?** If adopted this proposal would shorten or eliminate any antlerless moose season that extends beyond or starts after November 30.

**WHAT ARE THE CURRENT REGULATIONS?**

**Unit 20A Antlerless hunts:**

Unit 20A

- One antlerless moose by drawing permit (DM628 through DM679)
- August 15–November 15

Western Unit 20A

- One antlerless moose by limited registration permit (RM768, 20 permits)
- October 1–Last day of February

Unit 20A target hunt (AM751)

- One moose, limited registration permit
- Season: determined by ADF&G

**Unit 20B Antlerless moose hunts:**

Fairbanks Management Area by drawing permit (DM786, DM788)

- One antlerless moose by bow and arrow
- September 1–November 27

Creamer’s Field Migratory Waterfowl Refuge by drawing permit (DM789)

- One antlerless moose by muzzleloader
- December 1–January 31

Richardson Highway Corridor by drawing permit (DM783)

- One moose by bow and arrow, muzzleloader or crossbow
- September 21–Last day of February

Minto Flats Management Area by registration permit (RM785)

- One antlerless moose
- October 15–Last day of February unless closed by emergency order

Unit 20B target hunt (AM751)

- One moose, limited registration permit
- Season: determined by ADF&G

Refer to the *2019–2020 Alaska Hunting Regulations* for bull moose hunting seasons in this area.

Both Units 20A and 20B have positive findings for intensive management (IM) for high levels of consumptive uses of moose. The Unit 20A IM population objective is 10,000–15,000 moose and the IM harvest objective is 500–900 moose. The Unit 20B IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

The portion of Unit 20A outside the boundaries of the Fairbanks Nonsubsistence Area has a positive C&T finding for moose with an ANS of 50–70 moose. The portion of Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Flats Management Area has a positive C&T finding for moose with an ANS of 75–100. There is a positive C&T finding for moose in Unit 20B within the Minto Flats Management Area, with ANS of 20–40 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would shorten or eliminate 4 different antlerless moose hunts in Unit 20A and 20B, including some customary and traditional opportunities.

**BACKGROUND:** Units 20A and 20B currently have a moose population within the Intensive Management population objectives and the current management strategy is to maintain the current population size. During the last decade, in both Units 20A and 20B we implemented various antlerless moose hunts to reduce moose populations that were too large for the existing habitat. Department personnel worked with local advisory committees and developed hunts that would best suit the public. Hunts spanned from August to as late as March. Currently antlerless moose hunts are being used at low levels in both units and most hunts end prior to November 30. The total harvest of antlerless moose taken after November 30 in both units is low.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because it is a reduction in opportunity to harvest moose. No conservation concern would be addressed or created by adoption of this proposal. Antlerless moose hunts are a valuable tool the department has to reduce or maintain populations, provide subsistence opportunity (especially during a longer winter season), and to meet intensive management harvest levels. Antlerless harvest at current harvest rates, as managed by permit hunts, is minimal and likely does not affect the population. If the population does begin to grow to inappropriate levels, then antlerless moose harvest would be crucial. Harvest of antlerless moose after November 30 is low currently. Adoption of this proposal would eliminate some subsistence opportunity and hunting opportunity during the winter months.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.



\*\*\*\*\*

**PROPOSAL 145** – **Hunting seasons and bag limits for moose.** Modify the nonresident bag limit for moose in Unit 25C.

**PROPOSED BY:** Jormah Pope

**WHAT WOULD THE PROPOSAL DO?** If adopted this proposal would change the bag limit for nonresident moose hunters from one bull to one bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side.

**WHAT ARE THE CURRENT REGULATIONS?**

**Unit 25C:**

Residents

- One bull, September 1–15

Nonresidents

- One bull, September 5–15

Unit 25C does not have a positive finding for Intensive Management. It does have a positive C&T finding for moose outside the Fairbanks Nonsubsistence Area, and an ANS of 8–15 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would require nonresident hunters to harvest moose with antlers 50 inches wide or with 4 or more brow tines on at least 1 side. Therefore, it is likely that nonresident harvest would decrease in this area.

**BACKGROUND:** The average total moose harvest during 2014–2018 was 80 bulls per year (an average of 63 by residents and 17 by nonresidents.) A moose survey has not been conducted for many years so we do not have a recent estimate of harvestable surplus. However, historical surveys and anecdotal information suggest that the Unit 25C moose population is similar to many low-density populations. Hunter participation is moderate and lower than in Units 20A, 20B and 20D. The harvest has remained stable for many years, suggesting that harvest levels are not a biological concern for the area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 146** – **5 AAC 85.025. Hunting seasons and bag limits for caribou.** Allocate up to ten percent of the caribou drawing permits DC827 in Unit 20A to nonresidents.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** If adopted, this proposal would allocate up to 10% of the Unit 20A caribou drawing permits (DC827) to nonresidents.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20A Caribou:

Residents and Nonresidents

One Bull by drawing permit (DC827)

August 10–September 20

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would limit nonresidents to no more than 10% of the drawing permits for Unit 20A caribou. At this time 150 permits are issued so nonresidents would be limited to 15 permits.

**BACKGROUND:** The Delta caribou herd in Unit 20A has an estimated population of 2,000–3,000 caribou. The department issues 150 caribou permits annually and the average total harvest during 2014–2018 was 54 bull caribou. During 2014–2018, nonresidents averaged drawing 15 permits annually and had an average harvest of 13 caribou. In 2017 and 2018 the number of permits drawn by nonresidents was 22 (15% of all permits) and 27 (18% of all permits) respectively compared to 11 (7%), 9 (6%), and 7 (5%) drawn during 2014, 2015, and 2016, respectively. This hunt is within the Fairbanks Nonsubsistence Area and does not have a positive finding for Intensive Management.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue, and recommends the board examine board finding 2017-222-BOG regarding nonresident hunter allocation as it deliberates the allocation of hunting opportunity to nonresidents.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

\*\*\*\*\*

**PROPOSAL 147 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Extend the hunting season for brown bear in Units 20A and 20B Remainder

**PROPOSED BY:** Jeff Lucas

**WHAT WOULD THE PROPOSAL DO?** If adopted, this proposal would add 30 days to the current brown/grizzly bear season in Units 20A and 20B and it would align the end of the brown/grizzly bear season with the end of black bear baiting season on June 30.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20A and remainder of Unit 20B

Resident and nonresident hunters:

- One brown bear every regulatory year, September 1–May 31.
- Cubs and sows with cubs may not be taken.
- Hunting brown bears over bait is legal, April 15–May 31.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing brown bears is required within 30 days of harvest.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

There is a positive C&T finding for brown bears in Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Area, combined with Unit 20C. The ANS is 1–3 brown bears.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** By extending the brown bear season to June 30, this proposal would align the brown bear baiting season with the black bear baiting season (April 15–June 30) and it would likely increase the number of bears harvested.

**BACKGROUND:** Brown bear harvest in Unit 20A and Unit 20B remainder is higher than the estimated sustainable harvest. Results of research in the 1980s and 1990s indicate that the estimated annual sustainable harvest of bears  $\geq 2$  years old was  $\leq 12$  bears in Unit 20A and  $\leq 9$  bears in Unit 20B. Average reported harvest during 2014–2018 was 27 bears in Unit 20A and 15 bears in Unit 20B. In Unit 20A, the proportion of females in the harvest was higher (49%) during RY14–RY18 than the recommended 45% or less of the estimated population. No more than 45% females in the harvest is considered to be necessary to sustain a stable population. The department recognizes that the data from the 1980s and 1990s may be outdated or that increases in the population may have occurred since those studies. However, the current harvest has been sustained over many years and the higher percentage of females in the harvest may be linked to a high proportion of young bears in the population. Other indicators (such as moose calf-to-cow ratios) have been consistently high in both Units 20A and 20B, indicating that bear predation is not affecting the moose population. Also, the number of nuisance bears or bears killed in Defense of Life and Property (DLP) is low in both units. These anecdotal indicators suggest that the population may be at an appropriate level for the habitat and the current harvest may be sustainable. The department has concerns regarding the sustainability of additional harvest on this bear population.

Brown bear hunting seasons and bag limits have been broadened over the last decade in Region III through resident tag fee exemptions, increased bag limits, longer seasons, and, in some units (including Units 20A and 20B), allowing the take of brown bears at registered bear bait stations. In the Fairbanks area, the take of brown bears over bait was first allowed in Unit 20C during RY12, followed by Units 20A and 20B in RY14. Most bear hunting seasons in Region III are August 10–June 30, except for easily-accessed and heavily hunted areas, including Unit 20A and central and western portions of Unit 20B (remainder), where the season ends May 31.

There is a high volume of registered bear bait stations in Units 20A and 20B (n=116 and 525, respectively, during RY14–RY18). Harvest of brown bears taken over bait during RY14–RY18 averaged 4 in Unit 20A and 9 in Unit 20B.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because of biological concerns regarding the sustainability of additional harvest on this bear population. The department lacks precise scientific data on the number of bears and harvest rates and recommends a conservative management strategy. Units 20A and 20B have a high density of bear bait stations and extending the brown bear baiting season for 1 month would likely result in a significant increase of brown bear harvest in these units. The risk of substantial increase in harvest is high because of the high volume of bear bait sites registered in the area coupled with extensive access, particularly in central Unit 20B.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 148 – Hunting seasons and bag limits for brown bear.** Extend the hunting season for brown bear in Unit 20B Remainder.

**PROPOSED BY:** Nicholas Muche

**WHAT WOULD THE PROPOSAL DO?** If adopted, this proposal would add 30 days to the current brown/grizzly bear season in Unit 20B and align the end of the brown/grizzly bear season with the end of Black bear baiting season (June 30).

**WHAT ARE THE CURRENT REGULATIONS?**

Remainder of Unit 20B

**Resident and nonresident hunters:**

- One brown bear every regulatory year, September 1–May 31.
- Cubs and sows with cubs may not be taken.
- Hunting brown bears over bait is legal, April 15–May 31.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing of hide and skull are required within 30 days of harvest.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** By extending the brown bear season to June 30, this proposal would align the brown bear baiting season with the black bear baiting season (April 15–June 30) and it would likely increase the number of bears harvested.

**BACKGROUND:** Brown bear harvest in Unit 20A and Unit 20B remainder is higher than the estimated sustainable harvest. Results of research in the 1980s and 1990s indicate that the estimated annual sustainable harvest of bears  $\geq 2$  years old was  $\leq 12$  bears in Unit 20A and  $\leq 9$  bears in Unit 20B. Average reported harvest during 2014–2018 was 27 bears in Unit 20A and 15 bears in Unit 20B. In Unit 20A, the proportion of females in the harvest was higher (49%) during

RY14–RY18 than the recommended 45% or less of the estimated population. No more than 45% females in the harvest is considered to be necessary to sustain a stable population. The department recognizes that the data from the 1980s and 1990s may be outdated or that increases in the population may have occurred since those studies. However, the current harvest has been sustained over many years and the higher percentage of females in the harvest may be linked to a high proportion of young bears in the population. Other indicators (such as moose calf-to-cow ratios) have been consistently high in both Units 20A and 20B, indicating that bear predation is not affecting the moose population. Also, the number of nuisance bears or bears killed in Defense of Life and Property (DLP) is low in both units. These anecdotal indicators suggest that the population may be at an appropriate level for the habitat and the current harvest may be sustainable. The department has concerns regarding the sustainability of additional harvest on this bear population.

Brown bear hunting seasons and bag limits have been broadened over the last decade in Region III through resident tag fee exemptions, increased bag limits, longer seasons, and, in some units (including Units 20A and 20B), allowing the take of brown bears at registered bear bait stations. In the Fairbanks area, the take of brown bears over bait was first allowed in Unit 20C during RY12, followed by Units 20A and 20B in RY14. Most bear hunting seasons in Region III are August 10–June 30, with the exception of easily-accessed and heavily hunted areas, including Unit 20A and central and western portions of Unit 20B (remainder), where the season ends May 31.

There is a high volume of registered bear bait stations in Units 20A and 20B (n=116 and 525, respectively, during RY14–RY18). Harvest of brown bears taken over bait during RY14–RY18 averaged 4 in Unit 20A and 9 in Unit 20B.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because of biological concerns regarding the sustainability of additional harvest on this bear population. The department lacks precise scientific data on the number of bears and harvest rates and recommends a conservative management strategy. The take of brown bears at bait stations became legal in RY12 in Unit 20B. The average harvest during the 5 years previous to the legalization of baiting was 14 bears annually. After baiting became legal the average harvest for the past 5 years was 15 bears. A majority of the harvest now occurs during the spring hunting season. At this time the department would prefer to maintain a conservative harvest strategy. The risk of substantial increase in harvest is high because of the high volume of bear bait sites registered in the area coupled with extensive access, particularly in central Unit 20B.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 149 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Allow brown bears to be taken over bait in Unit 25C.

**PROPOSED BY:** Michael Hajworonky

**WHAT WOULD THE PROPOSAL DO?** Allow the harvest of brown bears at bear bait stations in Unit 25C.

**WHAT ARE THE CURRENT REGULATIONS?**

*Unit 25C*

Resident and nonresident hunters:

- One brown/grizzly bear every regulatory year, September 1–May 31.
- Cubs and sows with cubs may not be taken.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing of hide and skull is required within 30 days of harvest.
- Hunting brown/grizzly bears over bait is not legal.

Refer to the *2019–2020 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would result in increased opportunity and harvest.

**BACKGROUND:** The department does not have any quantifiable data regarding the brown bear population in Unit 25C. However, a large portion of the area is remote with minimal access, harvest is low, and most of the harvest occurs incidentally by hunters pursuing other species. Harvest in Unit 25C during 2014–2018 averaged 4 bears per year.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** the additional harvest opportunity because there are no biological concerns. Any additional harvest would be minimal due to low human density and relatively poor access. Thus, there would be no measurable population effect.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 150– 5 AAC 92.113. Intensive Management Plans III.** Establish an intensive management (IM) plan for wolves and bears in the Minto Flats Management Area in Unit 20B.

**PROPOSED BY:** Hanna Alexander

**WHAT WOULD THE PROPOSAL DO?** If adopted the department would create an IM plan that would include predator control for both wolves and bears in Minto Flats Management Area (MFMA). The first step in creating an IM plan would be for the board to direct the department to conduct a feasibility assessment to determine whether IM is feasible.

**WHAT ARE THE CURRENT REGULATIONS?** Currently there is no IM plan or predator control plan in the Minto Flats Management area.

There is a positive C&T finding for moose in Unit 20B within the MFMA, with an ANS of 20–40 moose.

Unit 20B (including MFMA) has a positive finding for IM because the unit is important for providing high levels of harvest for human consumptive use. The IM population objective is 12,000–15,000 moose and the harvest objective is 600–1,500 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would require the department to conduct an assessment of the feasibility of creating an IM plan in this area. If the board then determines an IM plan would be feasible, it would result in controlling predation on moose by wolves and/or bears in MFMA with the intent to increase the moose population and increase moose harvest.

**BACKGROUND:** The Minto Flats Management Area (MFMA) is a 951 mi<sup>2</sup> area in western Unit 20B with a nutritionally-stressed moose population. The MFMA currently has a moose density of 2.5 moose per square mile. Recent data collected by the department show that low twinning rates and low 10-month-old calf weights, which are indicators of nutritional stress, persist in this moose population.

Unit 20B had a population estimate of approximately 13,000 moose in 2017, which falls within the IM population objective of 12,000–15,000. In 2010, the MFMA population was estimated at about 4,100 moose (about 4 moose per square mile.) This high-density population exhibited signs of nutritional stress with low twinning rates, high browse removal rates, and low calf weights. With the use of antlerless moose harvest, the population was intentionally reduced to the current population of about 2,500 moose. Limited antlerless moose harvest continues in the area to maintain the population at this level.

During the spring of 2018, while investigating an outbreak of dog lice in the MFMA, the department located as many wolf packs as possible within the MFMA and adjacent areas (1,607 mi<sup>2</sup>). It was estimated that 9 packs contained 85–96 wolves. In the spring of 2019 while conducting the same project, a total of 50 wolves were estimated in this area. Although wolf densities appear to be high in this area, likely due to the high density of moose, 2018 and 2019 are the only years wolf surveys have been conducted in the past 20 years. At this time, the department has no data on bear populations within this area, but anecdotal information suggests that black bears are at moderate densities and grizzly bears exist at low densities.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal. This is a high-density moose population that continues to exhibit signs of nutritional stress. It would not be appropriate to reduce the predator population within this area to attempt to grow this moose population. The harvest of antlerless moose is currently at a level that does not allow growth of this population.

**COST ANALYSIS:** Adopting this proposal would have significant cost to the department.

\*\*\*\*\*

**PROPOSAL 151 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.** Lengthen the season dates for hunting wolves in a portion of Unit 20C.

**PROPOSED BY:** Hunter and Gatherers Lives Matter

**WHAT WOULD THE PROPOSAL DO?** If adopted this proposal would align the wolf hunting season in this small portion of Unit 20C near Denali National Park with the remainder of Unit 20C and with nearby Unit 20A. This proposal would increase the wolf hunting season by 16 days.

**WHAT ARE THE CURRENT REGULATIONS?**

Resident and nonresident wolf hunting seasons and bag limits in Unit 20 for are as follows:

Unit 20C, that portion west of a line beginning at 63°48.146' N. LAT., 148° 59.934' W. LONG., North to 63° 49.445' N. LAT., 148° 59.935' W. LONG., then West to 63° 49.445' N. LAT., 149° 12.699' W. LONG., then North to 63° 54.642' N. LAT., 149° 12.699' W. LONG., and bounded on the South, West, and North by Denali National Park

- 10 wolves during August 10–April 15  
Remainder of Unit 20

- 10 wolves during August 10–May 31

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would lengthen the wolf hunting season in the portion of Unit 20C near Denali National Park and align it with the remainder of Unit 20. It would increase wolf hunting opportunity by 16 days.

**BACKGROUND:** This is a high-profile area that has had many different regulations over the last 20 years. In March 2016, the board passed a proposal by the National Park Service to shorten the wolf hunting season to end April 15. The change was an effort to prevent wolves from being harvested over black bear bait stations in the area. During 2006–2016, a total of 3 wolves were reported harvested in May in this area when the wolf hunting season was aligned with the remainder of Unit 20.

**DEPARTMENT COMMENTS:** The department is **SUPPORTS** the increase in harvest opportunity because there are no biological concerns because the harvest of wolves in the area is low (averaging fewer than 5 annually), and is **NEUTRAL** on the allocative aspect of this proposal. Increasing the season by 16 days likely would minimally increase harvest and would not impact the Unit 20C wolf population.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 152 – 5 AAC 92.510. Areas closed to hunting, and 5 AAC 92.550. Areas closed to trapping.** Establish closed areas for the taking of wolves near Denali National Park in Unit 20C.



**PROPOSED BY:** Denali National Park and Preserve

**WHAT WOULD THE PROPOSAL DO?** This proposal would close the part of Unit 20C that is within the portion of Unit 20C in Uniform Coding Units 0502, 0605 and 0607 west of the George Parks Highway and bounded by Denali National Park on 3 sides (Stampede Road area), to the taking of wolves by hunting during February 1–July 31 and by trapping during February 1–October 31.

**WHAT ARE THE CURRENT REGULATIONS?**

*Resident and nonresidents*

Hunting:

- Unit 20C, remainder: Aug. 10–May 31 (ten wolves)
- Unit 20C, within the Stampede Corridor: Aug. 10–Apr. 15 (10 wolves)

Trapping:

- 20C: Nov. 1–Apr. 30 (No limit)

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would reduce hunting and trapping opportunity in a portion of Unit 20C.

**BACKGROUND:** From 2000 to 2010, the board approved the year-round closure of certain areas near the Denali National Park boundary to wolf hunting and trapping in order to protect wolf viewing opportunities in the park. In 2010, the board rescinded the Stampede and Nenana Canyon closed areas. In 2017, the board passed a regulation which closed the wolf hunting season in the Stampede area on April 15 to prevent the take of wolves at bear bait stations.

The department provides the following factors for the board to consider when making this decision: 1) the existing biological data show that the harvest of wolves outside the park is not a biological concern for sustainability of populations or packs within or outside of the park and preserve; 2) although harvest occurs by trappers adjacent to the park, not all of the harvest likely occurred within the proposed buffer area and not all was from packs that have been available for viewing by park visitors; and 3) viewing opportunities for the public in the park depend mostly on where wolves den, where they make kills, and the predominant vegetation types along the viewing routes.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because this is an allocation issue. There are no biological concerns because the harvest of wolves in the proposed area is low (averaging fewer than 5 annually) and has no effect on the area's wolf population. The department in general is opposed to the reduction in harvest opportunity when there is no concern for the population.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 153 – 5 AAC: 84.270. Furbearer trapping.** Extend the trapping season for wolverines in Unit 20F.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee and Russel Wood

**WHAT WOULD THE PROPOSAL DO?** If adopted this proposal would extend the wolverine trapping season by 15 days, from November 1–Last day of February to November 1–March 15.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20F:

Wolverine trapping season

- November 1–Last day of February

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would increase the trapping season for wolverines in Unit 20F by 15 days and may increase harvest.

**BACKGROUND:** The department does not have wolverine population data for Unit 20F. Most of the unit is remote and has some prime wolverine habitat. Trapping effort is limited to a small number of trappers and most of them access the unit from the Dalton Highway. The average annual harvest during 2014–2018 was 9 wolverines.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** the increase in harvest opportunity because there are no biological concerns because the harvest of wolverine in the area is low. It is unlikely that an additional 15 days of trapping season would increase harvest enough to have a measurable effect on the wolverine population.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

\*\*\*\*\*

**PROPOSAL 154 – 5 AAC 92.530. Management areas.** Restrict the taking of waterfowl in the Badger Slough area in Unit 20B to falconry and archery with flu-flu arrows.

**PROPOSED BY:** Debra Vance

**WHAT WOULD THE PROPOSAL DO?** If adopted this proposal would change the methods by which a hunter would be allowed to harvest waterfowl. Only the use of a bow and arrow with flu-flu arrows and falconry would be allowed as methods to harvest waterfowl in this area.

**WHAT ARE THE CURRENT REGULATIONS?** Waterfowl season in Unit 20B, within the Chena Slough area is September 1–December 16. The use of shotguns is currently permitted in this area. This area is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would limit waterfowl hunters to archery equipment or falconry and would limit waterfowl hunting opportunity along Badger Slough.

**BACKGROUND:** Chena Slough (also known as Badger Slough) is a tributary of the Chena River that flows from the North Pole area along Badger Road to its confluence with the Chena River upstream of Fort Wainwright. The slough mainly flows through residential areas and near roadways and rarely flows through remote areas. The slough is outside city limits, therefore the use of firearms is not prohibited. The department does not have any data on effort or harvest by waterfowl hunters in this area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative portion of this, and in general **OPPOSES** the potential limitation of opportunity since there is no biological issue associated with it. Although the department rarely receives complaints from homeowners in the area, the Alaska Wildlife Troopers regularly field complaints about waterfowl hunters shooting near housing developments and other urban centers in this area.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

\*\*\*\*\*

**PROPOSAL 155 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 1C as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 1C, Berners Bay drainages 1 moose by drawing permit only; up to 30 permits may be issued	Sept. 15—Oct. 15 (General hunt only)	Sept. 15—Oct. 15
...		
Unit 1C, that portion west of Excursion Inlet and north of Icy Passage		

1 moose per regulatory year,  
only as follows:

...

1 antlerless moose by drawing  
permit only; up to 100 permits  
may be issued

Nov. 10—Dec. 10  
(General hunt only)

Nov. 10—Dec. 10

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow for cow moose harvest in Berners Bay (DM041) and Gustavus (RM049). Reauthorization is required annually.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 1C, Berners Bay drainages 1 moose by drawing permit only; up to 30 permits may be issued	Sept. 15—Oct. 15 (General hunt only)	Sept. 15—Oct. 15
...		
Unit 1C, that portion west of Excursion Inlet and north of Icy Passage		

1 moose per regulatory year,  
only as follows:

...

1 antlerless moose by drawing  
permit only; up to 100 permits  
may be issued

Nov. 10—Dec. 10  
(General hunt only)

Nov. 10—Dec. 10

The Berner's Bay population is in the Juneau Nonsubsistence Area, and the Gustavus Forelands moose population has a negative customary and traditional use finding.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal allows for cow moose hunts for Berners Bay and Gustavus to manage the moose population within carrying capacity and provide additional harvest opportunity.

**BACKGROUND:** Antlerless moose hunts have been authorized for the Berners Bay and Gustavus moose populations in Unit 1C for over a decade. Those hunts were instituted as tools that could be used to manage both populations to within carrying capacity of the limited habitat in each area and to offer additional harvest opportunity as warranted. Antlerless hunts have been periodically and successfully used in both areas but must be reauthorized each year.

**Berners Bay:** The Berners Bay (Unit 1C) strategic moose management plan calls for a post-hunt population of 90 moose based on the area's estimated carrying capacity. The Department of Fish and Game (department) has been successful at maintaining the Berners Bay population close to the post-hunt population objective by implementing both bull and cow hunts.

From 1998–2006, the number of drawing permits for Berners Bay moose ranged from ten bull and ten antlerless permits to seven bull permits and no antlerless permits. The average annual harvest of bulls during that period was seven moose, and in years when antlerless permits were issued, the annual harvest averaged four cow moose. Although the department has authorization to issue a total of 30 permits each year, no more than 20 total permits have been issued during a single year. Several severe winters from 2006–2009 resulted in overwinter mortality and population declines. No Berners Bay moose permits were issued from 2007–2013.

The number of drawing permits issued annually for Berners Bay is based on the number of moose observed during winter aerial surveys. The mean number of moose seen during aerial surveys conducted from 1990–2006 was 77 (range: 59–108). The number of moose seen on surveys declined during consecutive severe winters from 2006–2009 and only 33–62 moose were seen during surveys from 2007–2009. Since 2010, most winters have been moderate to mild and the population has recovered. Under ideal survey conditions in 2012, 116 moose were observed, including 21 bulls, 81 cows, and 14 calves. Adjusted for sightability based on collared moose, the 2012 population was estimated at 113 +/-11 moose. During the most recent survey in December 2016, a total of 115 moose were observed, including 18 bulls, 31 cows, 27 calves, and 39 adult moose of unknown sex. Based on that survey and sightability of collared moose, the population was estimated to be 141 +/-25 moose. The winter of 2017–18 was relatively snow-free until mid-February, and we were unable to survey this population. In late winter February 2019, we were able to survey and observed 2 bulls, 13 calves, 26 cows, and 65 unknown sex moose, which estimated to 137±23 moose. Most of the bulls had lost their antlers and we were unable to calculate a reliable bull:cow ratio. Survival of radiocollared moose has been high in the last few winters and we believe the population continues to slowly grow. The Berners Bay population now exceeds the population and bull:cow objectives in the management plan. However, more recent habitat data suggest habitat in Berners Bay can support a higher post-hunt population than previously thought.

The department plans to manage the population by harvesting bulls. Five bull permits were issued in 2014 and 2015, and, in response to growing population estimates, seven bull permits were issued in 2016–2018. Starting in 2019, however, the Federal Subsistence Board has claimed 25% of the permits in Berners Bay for subsistence hunters under a drawing hunt for two permits, leaving 5 permits available for the state hunt. The department would like to retain the ability to implement an antlerless moose hunt should the population or habitat conditions warrant that type of management.

**Gustavus:** The Gustavus moose population (Unit 1C) rapidly expanded from just a few animals in the 1980s and early 1990s to a peak of about 400 animals in 2003. In 2002, the department estimated the density of moose on the Gustavus Forelands winter range exceeded five moose per km<sup>2</sup> despite only a small proportion of the area consisting of productive (abundant willow) winter habitat. In response to concerns about moose damaging the winter habitat, the department initiated spring browse surveys in 1999 and determined that an unsustainable level (85% – 95%) of the current annual growth of willow twigs had been consumed by moose.

To conserve winter habitat, the department requested the Board of Game authorize an antlerless moose hunt and the first antlerless hunt was held in the fall of 2000. From 2002–2008, hunters harvested between 11 and 67 antlerless moose annually, depending on the number of permits issued. No hunt was held in fall 2007 due to high moose mortality during the severe winter of 2006–2007 and no antlerless hunts have been held since 2009.

The objective of antlerless moose hunts in Gustavus is to maintain the moose population using the winter range to levels commensurate with habitat capability. Based on aerial surveys corrected for sightability and annual browse surveys, management of the population using antlerless hunts has been successful. In 2013, under favorable survey conditions, 186 moose (25 bulls, 121 cows, and 40 calves) were observed. The population estimate corrected for sightability was 323 +/-87 moose. Under poor late winter survey conditions in March 2014, 91 (24 cows, 12 calves, and 55 unknown) moose were seen, yielding a sightability corrected population estimate of 244 +/-98 moose. Due to exceptionally mild winter weather at the time of this survey, a number of radiocollared moose had already transitioned to forested summer range outside the survey area. There was little snow cover during the winter of 2014–15, so no survey was attempted. The most recent surveys under moderate conditions in March 2018 resulted in a population estimate of 230 ± 30 moose, and a survey of most of the moose habitat in November 2019 resulted in an estimate of 244 ± 72 moose.

Severe winters from 2006 through 2009 reduced calf survival, but since then calf survival has improved. Even during severe winters, survival of adult females remained high at about 89%. Given the improved survival rate of calves during successive mild winters and stable cow survival, the potential exists for the Gustavus moose population to rapidly increase.

The Gustavus moose population is currently at a level the department believes is appropriate for the available winter habitat. However, we believe it is important to retain the ability to implement antlerless hunts should the population increase to a level that is detrimental to the habitat.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 156 – 5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 5A, Nunatak Bench, as follows:

**Resident Open Season**

<b>Units and Bag Limits</b>	<b>(Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(3)		
Unit 5(A), that portion south of Wrangell -Saint Elias National Park, north and east of Russell and Nunatak Fiords, and east of the east side of East Nunatak Glacier to the Canadian Border (Nunatak Bench) 1 moose by registration permit only; up to 5 moose may be taken	Nov. 15—Feb. 15	Nov. 15—Feb. 15

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the Nunatak Bench moose hunt (RM059) to continue and allow for the harvest of cow moose in this hunt.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(3)		
Unit 5(A), that portion south of Wrangell -Saint Elias National Park, north and east of Russell and Nunatak Fiords, and east of the east side of East Nunatak Glacier to the Canadian Border (Nunatak Bench) 1 moose by registration permit only; up to 5 moose may be taken	Nov. 15—Feb. 15	Nov. 15—Feb. 15

The board has made a positive customary and traditional use finding for moose in Unit 5, with an amount reasonably necessary for subsistence of 50 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal allows for additional moose hunting opportunities in unit 5A, especially important to those hunters who did not harvest a moose earlier in the season.

**BACKGROUND:** The Nunatak Bench (Unit 5A) hunt area is managed as a separate population because it is generally isolated from other moose populations by fiords and glaciers. The area is subject to severe winters and has low capability to support moose relative to other moose habitat in Unit 5A. The purposes of this hunt are to provide opportunity as the population allows and to maintain the number of moose within a level the limited habitat can support. This hunt opens after other moose hunts in the unit have closed, and it is a popular alternative for hunters who were unsuccessful during those hunts. Because much of the open season for this hunt takes place after bulls have dropped their antlers, either sex may be harvested.

The Nunatak Bench strategic moose management plan calls for a post-hunt population of no more than 50 moose. During an aerial survey in 2001, 52 moose were seen. From 2005 through 2012, only 11–14 moose with one or two calves were seen during surveys. The decline in moose numbers following the 2001 survey may be related to the 68-foot rise of Russel Fiord flooding and damaging habitat when it was blocked by the surging Hubbard Glacier during 2003. Due to poor weather and the remoteness of the location, this area was not surveyed again until December 2015 when a total of 14 moose (three bulls, two cows, three calves, and six unknown) were seen. A series of severe winters from 2006 through 2012 may have inhibited recovery of the population. We have been unable to complete another survey since 2015 due to poor snow conditions.

From 1997 through 2004, an average of 12 either-sex permits were issued annually with an average of four people hunting each year. During that period a total of 15 moose (nine bulls, six cows) were harvested for an average of about two moose per year. No permits have been issued and no moose have been harvested in this area since 2004.

The Department of Fish and Game believes it is important to retain the ability to implement an antlerless hunt in this area to prevent habitat damage should the population increase. The department will continue to monitor this population as conditions allow, but we do not plan to issue hunt permits until the population reaches at least 25 moose.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 157 – 5 AAC 085.045(a)(4) Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose seasons in Unit 6(C).

**PROPOSED BY:** Alaska Department of Fish and Game.



**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would ensure that the department has the necessary tools to manage the Unit 6(C) moose population within objectives.

**WHAT ARE THE CURRENT REGULATIONS?**

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
...		
Unit 6(C)  1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued	Sept. 1–Oct. 31 (General hunt only)	No open season
1 moose by registration permit only	Nov. 1–Dec. 31	No open season
...		

The board made a negative customary and traditional use finding for moose in all of Unit 6.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes antlerless hunts in Unit 6(C) as required by statute. Resident hunters would be able to continue to harvest antlerless moose during hunts administered by ADF&G on state-managed lands in Unit 6.

**BACKGROUND:** Antlerless moose seasons must be reauthorized annually. The population objective is 600–800 moose. Population objectives were increased in 2017 in consultation with the local advisory committee and are documented in the most recent moose Management and Operational Plan:

[http://www.adfg.alaska.gov/static/research/wildlife/speciesmanagementreports/pdfs/moose\\_2015\\_2020\\_smr\\_gmu\\_6.pdf](http://www.adfg.alaska.gov/static/research/wildlife/speciesmanagementreports/pdfs/moose_2015_2020_smr_gmu_6.pdf).

A population survey completed during March 2018 yielded an estimate of 677 moose, 32% of which were calves. This population is aggressively harvested to maintain it within population objectives. We have managed this hunt cooperatively with the U. S. Forest Service and the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season. We have not held the state antlerless hunt since the 1999–2000 season. In 2013, a registration hunt was established that could be used to harvest moose, including antlerless moose, if the federal subsistence hunt is not held or it does not result in the desired amount of harvest. At this time, quotas have been raised on both the federal and state side to increase harvest and to bring the population within its objectives. A state hunt for antlered bull moose

(DM167) is held each year, in addition to the federal subsistence hunts. Continuation of the antlerless hunts is a necessary tool to achieve population objectives.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to reauthorize antlerless harvests in Unit 6.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 158 – 5 AAC 85.045(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose hunts in Unit 13; these hunts must be re-authorized annually by the Board to comply with statutory requirements.

**WHAT ARE THE CURRENT REGULATIONS?** The department is authorized to issue up to 200 drawing permits for antlerless moose hunts in Unit 13 for an October 1–31 and March 1–31 season. Hunters are prohibited from taking calves and cows accompanied by a calf.

<b>Units and Bag Limits (11)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 13 1 moose per regulatory year, only as follows:  ...	Oct. 1—Oct. 31 Mar. 1—Mar. 31 (General hunt only)	No open season
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		

...  
The board has made a positive customary and traditional use finding for moose in all of Unit 13, with an amount reasonably necessary for subsistence of 300–600 moose for the entire game management unit.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes the antlerless moose hunts in Unit 13 for the 2020 regulatory year; these hunts are needed to keep the moose population within intensive management objectives and provide additional hunting opportunity for residents.

**BACKGROUND:** The Unit 13 antlerless hunt was established in March 2011 and the first Unit 13 antlerless hunt under this regulation took place in September 2012. Ten permits have been issued annually for a single hunt area in the western portion of Unit 13A. The hunt area was extended for RY19 to include all of 13A West, where bull-to-cow ratios are low, twinning rates are low, browse removal is relatively high, and overall moose abundance in 13A has been at or above the upper end of the abundance objectives since 2009. This hunt resulted in the harvest of four cow moose during the 2012 season, two during the 2013 season, seven during the 2014 season, seven during the 2015 season, five during the 2016 season, eight during the 2017 season, and seven during the 2018 season. Twenty permits will be issued for RY20.

During the 2013 Board of Game meeting in Wasilla, the board adopted a proposal that changed the hunt from September 1–20 to October 1–31 and March 1–31. These new season dates were implemented in the fall of 2014, after which harvest success appears to have increased.

The board has also directed the department to issue antlerless moose permits when the moose population is at or above the midpoint of the population objective with the goal of harvesting up to 1% of the cow moose population. The current population objective for Unit 13A is 3,500–4,200, and the population was estimated to be above objective in 2015 and 2016, within objectives in 2017, and near the higher end of the objectives in 2018. The antlerless hunt in western Unit 13A contributes to maintaining the moose population within the intensive management objectives. The additional harvest provided through this hunt will also assist in achieving the harvest objectives for the population.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Antlerless moose hunts must be re-authorized annually by the board to comply with statutory requirements. These hunts are required to regulate the moose population within the established Intensive Management (IM) objectives for population size and harvest.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 159– 5 AAC 85.045 Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose draw permits in Units 14A and 14B and increase permit levels in Unit 14A.

**PROPOSED BY:** Alaska Department of Fish & Game

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts must be re-authorized annually by the Board to comply with statutory requirements.

**WHAT ARE THE CURRENT REGULATIONS?**

- The department has the authority to issue up to 2,000 drawing permits to resident hunters in Unit 14A with a bag limit of one antlerless moose. The season is August 20–September 25 for DM400–DM412 and November 1–December 25 for DM413.
- The department may also issue up to 200 permits to resident hunters for the targeted hunt in Unit 14A with a bag limit of one moose during a winter season to be announced by emergency order.
- The department may also issue up to 100 additional permits to resident hunters for a targeted hunt in Unit 14B with a bag limit of one moose during a winter season to be announced by emergency order.
- These opportunities are within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts are needed to keep the moose population within management objectives and provide additional hunting opportunity for residents. The targeted hunt also provides managers with a tool to reduce moose-vehicle collisions and address nuisance moose issues.

**BACKGROUND:** Moose surveys conducted in February 2019 provided an estimate of 7,900 moose in Unit 14A. This is less than the 2018 population estimate of 8,700; however, it is greater than the population objective of 6,000–6,500 moose. Twinning surveys conducted in the spring of 2019 showed a twinning rate of 21%: this is indicative of a population that is still increasing.

The number of antlerless permits available was raised in spring of 2011, from 400 to 1,000. Due to the heavy snows that same winter, there were no antlerless permits issued in 2012. Subsequent surveys indicated that the moose population was not adversely affected by the winter of 2011 and was continuing to grow. The number of permits available has been increasing and was raised to the limit of 1,000 permits for the fall of 2017. In spring of 2018 the board increased the permit levels to 2,000 permits and 1,302 permits were issued for RY18 and 1,310 in RY19. The success rate for hunters under the antlerless permits has remained steady at about 62% over the past five years.

The targeted moose hunt in Units 14A and 14B provide an additional tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. The AM415 targeted hunt has been in place since 2012. Under this permit, hunters are either designated a specific nuisance moose to take or are assigned one of four areas where a high number of moose–vehicle collisions are known to occur. In this scenario permits are issued as snow increases and moose become more prevalent along roadways. The winter of 2014 was very mild with almost no snow. As a result, only 20 permits were issued that year. No permits were

issued in the winter of 2017 or 2018. Excluding 2014, 2017, and 2018, on average 143 permits have been issued and 110 moose have been taken, providing an average success rate of 77%.

Based on current projections, the Unit 14A moose population is expected to grow and continue to exceed population objectives. If the density of moose is allowed to increase, we anticipate an increase in the number of moose-human conflicts, and moose may experience nutritional stress, particularly during severe winters.

Browse surveys completed in the spring of 2016 demonstrated a removal rate of 37.13% ( $\pm 6.9\%$  at the 95% CI). This offtake indicated a relatively high proportion of commonly browsed plants in the unit are being consumed, suggesting the moose population in Unit 14A may be approaching their carrying capacity. Browse surveys were conducted at the end of a winter which had little snowfall and browsing appeared to be more evenly distributed than in what would be found in a 'typical' year.

Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 318 moose per year have been killed in the Mat-Su Valley area during the last few years of average snowfall and substantially more were 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.

The Department uses the targeted hunts to mitigate public safety concerns by issuing permits to selected hunters and assigning them to hunt areas that correspond with areas of high moose-vehicle collisions or reoccurring nuisance issues.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Antlerless moose harvests are warranted to control the moose population's growth and reduce moose-human conflicts in the Mat-Su Valley. These hunts also provide additional moose hunting opportunity in the Mat-Su Valley.

**COST ANALYSIS:** Adoption of this proposal would not result in significant costs to the department.

\*\*\*\*\*

**PROPOSAL 160– 5 AAC 85.045(a)(5). Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C).

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C).

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are:

**Resident**

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

(5)

...

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

**RESIDENT HUNTERS:**

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

Aug. 20—Oct. 10  
(General hunt only)

**NONRESIDENT HUNTERS:**

1 bull by drawing permit only; up to 60 permits for bulls will be issued in combination with resident hunts

Aug. 20—Oct. 10

...

These opportunities are within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Antlerless moose seasons must be reauthorized annually. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. The moose population will be healthier and more productive due to decreased stress levels associated with winter food shortages.

**BACKGROUND:** The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters, and sharp reductions during severe winters. The number of permits issued (Table 160-1) depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A December 2016 aerial composition count of moose in

the Twentymile, Portage, and Placer river drainages found 155 moose with a bull:cow ratio of 31 bulls per 100 cows and a calf:cow ratio of 18 calves per 100 cows. In 2017 and 2018, there was not enough snow to conduct surveys.

Table 160-1. Moose harvest in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C), regulatory years 2014-2018.

<b>Regulatory Year</b>	<b>Bull Permits</b>	<b>Antlerless Permits</b>	<b>Bulls Harvested</b>	<b>Cows Harvested</b>
2014	40	30	17	10
2015	30	30	11	8
2016	30	30	13	12
2017	30	30	16	6
2018	31	30	13	6

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to maintain antlerless hunts in Units 7 and 14(C). These hunts have been successful in creating additional moose hunting opportunities with little or no controversy. In addition, the harvest of antlerless moose has helped achieve the department’s goal of maintaining moose numbers at a level to avoid die-offs during harsh winters.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 161 – 5 AAC 85.045 (12). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 14(C).

**PROPOSED BY:** Alaska Department of Fish and Game.

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the antlerless moose seasons in Unit 14(C).

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are:

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

(12)

...

Unit 14(C), Joint Base Elmendorf-Richardson	Sept. 1—Mar 31 (General hunt only)	Sept. 1—Mar 31
------------------------------------------------	---------------------------------------	----------------

(JBER) Management  
Area

1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued

Unit 14(C), that portion known as the Birchwood Management Area

Sept. 1—Sept. 30  
(General hunt only)

Sept. 1—Sept. 30

1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued

Unit 14(C), that portion known as the Anchorage Management Area

Sept. 1—Nov. 30  
(General hunt only)

No open season

1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued

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

1 moose by drawing permit only; up to 50 permits may be issued; or

Sept. 1—Sept. 30  
(General hunt only)

Sept. 1—Sept. 30

1 bull by registration permit only

Oct. 1—Nov. 30  
(General hunt only)

Oct. 1—Nov. 30

...

Remainder of Unit 14(C)

1 moose per regulatory year, only as follows:

1 bull with spike-fork antlers or 50-inch

Sept. 1—Sept. 30  
(General hunt only)

Sept. 1—Sept. 30



antlers or antlers with  
3 or more brow tines on one  
side; or

1 antlerless moose by  
drawing permit only; up  
to 60 permits may be  
issued; or

Sept. 1—Sept. 30  
(General hunt only)

No open season

1 bull by drawing permit only,  
by bow and arrow only; up to  
10 permits may be issued

Oct. 20—Nov. 15

No open season

...

These opportunities are within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal is necessary for the hunts to continue. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14(C) at the desired population objective (1,500 moose). At this population level we have seen reductions in over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and starvation during severe winters. At this level, the moose population will be healthier due to decreased stress levels associated with winter food shortages.

**BACKGROUND:** Moose in Unit 14(C) are managed intensively for a population objective of 1,500–1,800 moose and an annual harvest objective of 90–270 moose (5 AAC 92.108; Table 161-1). In 2013, we estimated a moose population of approximately 1,533 moose in Unit 14(C) from a combination of population census, composition surveys and extrapolation to unsurveyed areas. At this population level, we have received fewer reports of human-moose conflicts and of winter mortalities. Harvesting cow moose is paramount to maintaining the population at the low end of the objective while providing harvest opportunity.

Antlerless moose hunts must be reauthorized annually. The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality.

Table 161-1. Cow moose harvest in Unit 14(C), regulatory years 2014–2018.

Regulatory Year	Either Sex Permits	Antlerless Permits	Cows Harvested
2014	50	26	19
2015	65	25	23
2016	51	26	20
2017	50	26	28
2018	50	26	22

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to reauthorize antlerless hunts in Unit 14(C). These hunts have been successful in providing

additional moose hunting opportunities in the state’s human population center with little controversy. In addition, the harvest of antlerless moose has helped achieve the department’s goal of maintaining moose numbers at the low end of the population objective.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the department.

\*\*\*\*\*

**PROPOSAL 162 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO** This proposal would reauthorize the antlerless moose hunt for Kalgin Island in Unit 15B.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations as defined in 85.045 are:

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

There is a positive customary and traditional finding for moose on Kalgin Island, and an amount reasonably necessary of 2 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The antlerless moose season for Kalgin Island (RM572) in Unit 15B would be reauthorized. This hunt will help to maintain moose populations within sustainable levels on Kalgin Island, provide subsistence opportunity, maximize other harvest opportunity, and decrease the chance of high winterkill due to a lack of suitable forage.

**BACKGROUND:** Antlerless moose hunts must be reauthorized annually by the Board. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective.

In response to concerns that the moose population on Kalgin Island had exceeded the island’s carrying capacity, and due to deteriorating habitat conditions, the Board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the Board established a registration hunt for any moose in 1999. Despite these measures

to reduce moose numbers, moose remain abundant on the island and continue to exceed the management objective.

During the most recent moose survey (2018), department staff counted 85 moose on Kalgin Island. This count exceeded the population objective of 20–40 moose. In the last 10 years, an average of 122 permits were issued for this hunt; of which 85 permittees hunted, with an annual harvest of 30 moose.

The "any moose" registration hunt is recommended to provide additional mortality on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will minimize the danger of overharvest.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. This hunt helps to control the moose population on Kalgin Island and keep it within sustainable limits and provides subsistence opportunity.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the Department.

\*\*\*\*\*

**PROPOSAL 163 – 5 AAC 85.045.(a)(13). Hunting seasons and bag limits for moose.**

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

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

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal would reauthorize the antlerless moose hunt for the Homer Bench and the targeted antlerless hunt along the Sterling Highway in Unit 15C.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations as defined in 85.045 are:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay		

RESIDENT HUNTERS:

1 bull with spike  
or 50-inch antlers or antlers  
with 4 or more brow tines  
on one side; or

Sept. 1–Sept. 25  
(General hunt only)

1 antlerless moose by drawing  
permit only; the taking of  
calves, and females accompa-  
nied by calves, is prohibited;  
up to 100 permits may be issued in  
combination with the nonresident  
drawing hunt: or

Oct. 20–Nov. 20

1 moose by targeted permit only,

Oct. 15–Mar. 31

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or  
antlers with 4 or more brow  
tines on one side; or

Sept. 1–Sept. 25  
(General hunt only)

1 antlerless moose by drawing  
permit only; the taking of  
calves, and females accompa-  
nied by calves, is prohibited;  
up to 100 permits may be issued in  
combination with the resident  
drawing hunt

Oct. 20–Nov. 20

These hunts are within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The antlerless moose season for the Homer Bench (DM549) and the targeted hunt (AM550) along the Sterling Highway in 15C would be reauthorized for the 2020–2021 hunting season. This harvest will help minimize human–moose conflicts and winter kill deaths of moose due to limited habitat on the Homer Bench.

**BACKGROUND:** Antlerless moose seasons must be re–authorized annually. The Homer Bench in Unit 15C, which encompasses the hunt boundary of DM549, often holds high moose densities in winters when deep snow pushes the moose down into human populated areas. Even without deep snow, moose die due to malnutrition, and negative interactions with humans are also common as moose become more aggressive in their search for food around human residences.

In February 2017, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) that produced a population estimate of 3,529 moose (95% CI: range 2,769–4,289), of which 19% (95% CI: 14–24) were calves. When compared to the 2013 GSPE estimate of 3,204 ± 650, the 2017 estimate suggests the 15C moose population is stable or increasing slightly. Fall composition counts in core count areas in December 2018 provided a bull ratio of 40 bulls:100 cows. Fifty permits were issued in each of the last 10 years, resulting in an average annual harvest of 24 cows per year.

The purpose of AM550 is to allow for the harvest of moose along the Sterling Highway in Unit 15C during winters with deep snow accumulation that result in moose congregating near the Sterling Highway, which pose a significant threat to highway vehicles. On average, 61 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. The hunt is administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years. This hunt was established in 2015 and no permits have been issued to date.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Local residents are in favor of a limited antlerless moose harvest that provides additional opportunity and helps to limit habitat degradation and wildlife conflicts.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional costs to the Department.

\*\*\*\*\*

**PROPOSAL 164 – 5 AAC 85.045 Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose draw permits in Unit 16A.

**PROPOSED BY:** Alaska Department of Fish & Game

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose hunt in Unit 16A; this hunt must be re-authorized annually by the Board to comply with statutory requirements.

**WHAT ARE THE CURRENT REGULATIONS?** One antlerless moose by drawing permit only; up to 200 antlerless permits may be authorized. Unit 16A is within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes the antlerless moose hunt in Unit 16A; this hunt is needed to keep the moose population within management objectives and provide additional hunting opportunity for residents.

**BACKGROUND:** Although antlerless hunts may not be offered every year, antlerless moose hunts must be reauthorized annually. The board passed a proposal to add up to 200 antlerless draw permits at the 2019 Southcentral Meeting.

Moose surveys conducted in March 2019 yielded an estimate of 4,200 moose in Unit 16A. This estimate was greater than the post-hunt objective of 3,500–4,000 moose but less than the 2017

survey estimate of almost 8,700 moose. Previous information supports that this population is growing.

Densities of moose in excess of the population objective can have a negative impact on the habitat thereby creating a condition that leads to starvation in heavy snow winters. Reducing the population through antlerless permits can alleviate over-browsing of vegetation and help sustain the moose population within the unit.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Antlerless moose harvests are warranted to control the moose population's growth. These hunts also provide additional moose hunting opportunity in the Mat-Su Valley.

**COST ANALYSIS:** Adoption of this proposal would not result in significant costs to the department.

\*\*\*\*\*

**PROPOSAL 165 – 5 AAC 85.045(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose seasons for Unit 17A.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations for the Unit 17A moose hunt allow resident hunters a bag limit of two moose per regulatory year under registration permits; however, only 1 moose can be taken during the fall season. Nonresidents are restricted to a bag limit of one bull moose with antler restrictions by drawing permit.

- There are three fall hunts, one of which allows the harvest of an antlerless moose:
  - Registration permit (RM573), for resident hunters only with a bag limit of one bull moose, Aug 25–Sept 25;
  - Registration permit (RM571), for resident hunters only with a bag limit of one antlerless moose, Aug 25–Sept 25;
  - Drawing permit (DM570 - up to 20 permits are available), for non-resident hunters only, with a bag limit of one bull moose with 50” antlers or antlers with 4 or more brow tines on at least one side, Sept 5–Sept 15.
- There are two winter hunts, open to resident hunters only, one of which allows for the harvest of antlerless moose.
  - Registration permit (RM575), with a bag limit of one antlered bull moose;

- Registration permit (RM576), with a bag limit of one antlerless moose.
  - Winter hunt season dates for the winter hunts are as follows: “up to a 31-day season may be announced December 1–the end of February”. The seasons are opened concurrently by emergency order when good snow conditions exist for winter travel.

There is a positive customary and traditional use finding for moose in Unit 17, and an amount reasonably necessary for subsistence of 100–150 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would reauthorize the antlerless moose hunts in Unit 17A. These antlerless hunts would continue to provide hunters with additional harvest opportunity while helping managers by limiting the growth of the Unit 17A moose population that is already beyond the upper limit of our population objectives.

**BACKGROUND:** Moose are relative newcomers to much of Unit 17A, with only about 35 animals being present along the eastern border in 1980. Since then, moose have continued to increase in population size and expand throughout Unit 17A and west into Unit 18. Minimum counts of moose in Unit 17A were conducted in 14 different years during the period of 1991–2011, revealing a steady increase in moose numbers over time, with 1,166 moose counted in March 2011. During 2012–2015, surveys were not conducted due to inadequate snow conditions. Beginning in fall 2016, a Geospatial Population Estimator (GSPE) replaced the minimum count for enumerating moose in Unit 17A. We successfully implemented a GSPE for moose in 17A in 2016 and 2017; however, because Unit 17 did not receive enough snowfall to provide adequate tracking and identification of individual moose, we were unable to conduct the survey for a 2018 estimate. In spring 2017, this survey technique produced an estimate corrected for sightability (1.2) of 2,370 moose, ( $\pm 563$ ). The uncorrected estimate was 1,990 moose ( $\pm 437$ ). Although we do not have a 2018 estimate and conditions have not yet been appropriate to obtain a 2019 estimate, we do not anticipate that the moose population in Unit 17A has declined.

Moose management in Unit 17A has been guided by the Unit 17A Moose Management Group, consisting of members from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game advisory committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game. This group produced a Unit 17A Moose Management Plan that went through several iterations during 1996–2013, with the 2013 plan being used as the guiding document today. This plan has goals and objectives for hunter opportunity, harvest allocation, habitat mapping and population monitoring. The population objective for Unit 17A listed in the plan is 800–1,200 moose.

A drawing hunt for nonresident hunters was adopted by the board in 2013, with fall 2014 being the first year of that hunt. The impetus behind the nonresident hunt was abundant harvest

opportunity provided by this growing moose population, and objectives within the moose management plan that provide for the nonresident opportunity when the moose population exceeds 1,000 animals and is at a stable or increasing trend.

The winter antlerless hunt was adopted by the board and initiated in RY13. It allows for an antlerless harvest when the moose population is above 600 animals and is stable or increasing. During the five years of the RM576 antlerless hunt (RY13-RY17), 73 antlerless moose have been taken (66 cows and 7 bulls), for an average of ~13 cows/year.

Because of the concerns with the increasing moose numbers in Unit 17A that are already well above population objectives, a proposal was adopted by the board during their spring 2018 meeting in Dillingham to open an antlerless hunt in fall 2018 to increase harvest on the female segment of the population. During the first year of this hunt, in fall 2018, 8 antlerless moose were harvested, all were cows.

During RY2013–2017 the mean annual moose harvest in Unit 17 was 303 moose.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. The moose population in this unit is above the upper limit of the population objective. Allowing a small harvest of antlerless moose will help limit population growth while providing additional harvest opportunity for hunters.

**COST ANALYSIS:** Adoption of this proposal would not result in significant costs to the department.

\*\*\*\*\*

**PROPOSAL 166 – 5 AAC 92.015. Brown bear tag fee exemption.** Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal will reauthorize the brown bear tag fee exemptions in Units 9, 11, 13, 16, and 17.

**WHAT ARE THE CURRENT REGULATIONS?** The following regulations are currently in effect for Region IV brown bear hunts:

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 16A;
  - (3) Units 16B and 17;



...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9B, 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 9C, within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9D, within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9E, 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 9B;

(2) Unit 9E, that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Units 9D and 9E;

(3) Unit 17;

...

There is a positive customary and traditional use finding for brown bears in those portions of Units 17A and 17B that drain into the Nuyakuk and Tikchik lakes, with an amount reasonably necessary for subsistence of 5. There is a positive customary and traditional use finding for brown bears in the remainder of Unit 17B, and in Unit 17C, with an amount reasonably necessary for subsistence of 10–15 bears.

There is a positive customary and traditional use finding in Unit 9B, with an amount reasonably necessary for subsistence of 10–20 bears, and a positive customary and traditional use finding in 9E, with an amount reasonably necessary for subsistence of 10–15 bears. The remainder of Unit 9 has a negative customary and traditional use finding.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Hunters will not be required to purchase a brown bear locking tag before hunting brown bears in Units 11, 13, 16, and 17. In addition, brown bear tag fees will not be required for subsistence hunts in Units 9 and 17 or for permit hunts near communities in Unit 9.

**BACKGROUND:** 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 opportunity to take 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 take.

The board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities during the March 2011 Board of Game meeting. Brown bears are abundant in Unit 9 and are managed as a trophy species. Brown bears are frequently observed in communities destroying property in search of food or garbage and occasionally killing pets. The liberalized bear seasons and bag limits along with the elimination of the tag fee is 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 DLP bears.

**Subsistence Brown Bear Hunts:** The Board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9.

Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal because it provides greater sustainable harvest opportunity in Units 11, 13, 16, and 17; addresses public safety concerns in Unit 9; and provides subsistence harvest opportunity in portions of Units 9 and 17.

**COST ANALYSIS:** Adoption of this proposal would not result in significant costs to the department.

\*\*\*\*\*

