<u>Glennallen Area Proposals – Units 11 & 13</u>

PROPOSAL 51

5 AAC 85.010. Hunting seasons and bag limits for bison.

Expand the DI454 bison hunt area in Unit 11 as follows:

I would suggest amending the description of the hunt area.

East of the Copper River, south of the Klawasi River and west of a line from Mount Sanford to Mount Blackburn to Kuskulana Glacier, west of the Kuskulana River and north of the Chitina River [MOUNT WRANGELL TO LONG GLACIER, WEST OF THE KOTSINA RIVER]

What is the issue you would like the board to address and why? I propose extending the DI454 bison hunt area south beyond the Kotsina River to the Chitina River.

In the last ten years, bison from the Copper River herd have been extending their range south and eastward across the Kotsina River to the Chitina River and at times becoming a nuisance to vehicles traveling on the McCarthy Road. Extending the hunt area would allow motor vehicle access to a portion of the Copper River herd giving more hunting opportunities to people without the equipment or knowledge to safely cross the Copper River.

When the current description of the hunt area was originally written it was not generally believed that the herd would travel South beyond the Kotsina River. Now that bison frequently cross the Kotsina River it makes sense to amend the description of the hunt area to include that area which lies between the Kotsina and Chitina Rivers.

PROPOSAL 52

5 AAC 85.025(a)(8). Hunting seasons and bag limits for caribou.

Repeal the "pre-2018" caribou hunting regulations for Unit 13 as follows:

Repeal the following language from 5 AAC 85.025(a)(8):

[(A) BEFORE JULY 1, 2018, THE HUNTING SEASONS AND BAG LIMITS FOR CARIBOU IN UNIT 13 ARE AS FOLLOWS:

UNIT 13

1 CARIBOU PER HARVEST REPORT PER REGULATORY YEAR BY COMMUNITY HARVEST PERMIT ONLY; UP TO 300 CARIBOU MAY BE TAKEN AUG.10-SEPT.20 (SUBSISTENCE HUNT ONLY) OCT.21-MARCH 31 (SUBSISTENCE HUNT ONLY); OR

- 1 CARIBOU EVERY REGULATORY YEAR BY TIER 1 SUBSISTENCE PERMIT ONLY AUG.10-SEPT.20 (SUBSISTENCE HUNT ONLY) OCT.21-MARCH 31 (SUBSISTENCE HUNT ONLY); OR
- 1 CARIBOU EVERY REGULATORY YEAR BY DRAWING PERMIT; UP TO 5,000 PERMITS MAY BE ISSUED AUG.10-SEPT.20 OCT.21-MARCH 31.

UNITS 14(A) AND 14(B)

RESIDENTS

1 CARIBOU BY DRAWING PERMIT ONLY; AUG.10-SEPT.20 (WINTER SEASON TO BE ANNOUNCED)(GENERAL HUNT ONLY)

NONRESIDENTS

- 1 CARIBOU BY DRAWING PERMIT ONLY; AUG.10-SEPT.20 (WINTER SEASON TO BE ANNOUNCED).
- (B) ON OR AFTER JULY 1, 2018, THE HUNTING SEASONS AND BAG LIMITS FOR CARIBOU IN UNIT 13 ARE AS FOLLOWS:]

What is the issue you would like the board to address and why? Repeal pre-2018 regulations and return Unit 13 caribou hunting regulations to conventional style. It is our understanding that this approach to pre-July 1, 2018 regulations and post-July 1, 2018 regulations resulted from the fact that drawing permits had already been issued. The need for the pre-July 1, 2018 regulations has passed. (Housekeeping proposal.)

PROPOSAL 53

5 AAC 85.025(a)(8). Hunting seasons and bag limits for caribou.

Increase the community subsistence caribou hunt allocation in Unit 13 as follows:

Amend 5 AAC 85.025(a)(8) as follows:

up to 2 caribou per harvest report per regulatory year by community harvest permit only; up to [400] <u>500</u> caribou may be taken; or

What is the issue you would like the board to address and why? Increase the community subsistence caribou hunt allocation from up to 400 caribou may be taken to up to 500 caribou may be taken.

This change is requested in order to address the fact that addition caribou are needed in the community subsistence caribou hunt to provide for customary and traditional harvest and uses of caribou by Alaska residents living in Unit 13.

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

Increase the youth hunting season for caribou in Unit 13 as follows:

Increase the hunting season for Nelchina caribou (YC495) in Unit 13 as follows: One caribou every regulatory year by youth hunt drawing permit; up to 200 permits may be issued. August 1 - August **9** [5] and **October 21 - March 31**. Nonresidents: No open season.

What is the issue you would like the board to address and why? Currently, the season dates for Unit 13 Nelchina caribou under permit YC495 are August 1 – August 5. The five-day window is rather short. Additionally, CC001, DC485, RC561, and RC562 are open October 21 – March 31 after their first openings, if quotas are not met. Allowing participants in YC495 to participate from August 1 – August 9 and participate in the October 21- March 31 achieves the following:

- Allow for more opportunities for youth hunting participation.
 - Increasing the number of days to August 9 allows for a great window of opportunity for harvest. Herd locations in early August are scattered compared to mid to late September. Depending on year, it may take multiple days to scout an area as there have been no caribou hunters in the field.
 - If the current dates fall within the work week (such as August 1st being a Monday), it does not provide families opportunities to hunt on the weekend. Changing the end of the youth first season to August 9 would guarantee at least one full weekend to allow families to hunt and not take off any time from work.
 - The winter period provides dates such as Thanksgiving break, Winter break, and Spring break for students to hunt and not be taken away from academic commitments and provides greater flexibility for families to plan appropriately.
- Streamline dates for all draw and Tier I permits to have the same second season.
- Increases the amount of harvested caribou to help with desired population management. As stated on the Unit 13 Nelchina Caribou Hotline (at time of writing this), it does not appear that the 2019/2020 harvest quotas will be reached. I know a few families that would have liked to have their youth participate in the winter hunt and it would help with population management.

| PROPOSED BY: Tyler Eggen | (HQ-F20-002) |
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5 AAC 85.040. Hunting seasons and bag limits for goat.

Open a registration goat hunt for residents in Unit 13 as follows:

Create a goat registration hunt for Unit 13A from <u>August 10th to November 15th</u> [NO OPEN SEASON].

Harvest limit: (1) billy or nanny without kids.

What is the issue you would like the board to address and why? Create a goat registration hunt for Unit 13A from August 10th to November 15th.

Goats cross the Matanuska River from the Chugach Range on an abnormal and inconsistent basis. For this reason, they are not able to successfully create any legitimate herds that could be considered a natural range. There have been populations that have succeeded in establishing themselves in the past but have not been able to maintain any natural consistency.

With this, I feel it would be appropriate to offer a registration hunt for billies and nannies without kids. It is known that goats and sheep do not naturally co-habitat well together, therefore it would seem reasonable to harvest these particular goats that do not have a natural range or herd.

PROPOSAL 56

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

Extend the general season for moose by bow and arrow only for residents and nonresidents within Unit 11, remainder as follows:

Extend the general season from September 20 to September 25 by bow and arrow only. This hunt would be subject to the same residency requirements, area, and antler restrictions as outlined in the existing Unit 11 general season hunt. Hunters during the general season in Unit 11 currently may only harvest bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side. The purpose of extending the general season by bow and arrow only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 11 without having a negative impact on the resource.

What is the issue you would like the board to address and why? Extending the general season by bow and arrow only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 11 without having a negative impact on the resource. According to the Alaska Department of Fish and Game (ADF&G), from 2014 to 2018, only 1% of moose harvested in Unit 11 were taken with a bow. These reported archery harvests show the extremely low impact to moose populations. Lastly, having a season that does not extend beyond September 25 would mirror most other moose season end dates in the surrounding units.

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

Establish a registration hunt for bull moose open to certified bowhunters only within Unit 11, remainder as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on September 21 and closing on September 30 or by emergency order. Number of permits and harvest reporting requirements would be set by the Department of Fish and Game. This hunt would be subject to the same residency requirements, area, and antler restrictions as outlined in the existing Unit 11 general season hunt. Hunters during the general season in Unit 11 currently may only harvest bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side.

Registration would be available online or in person at ADF&G offices.

The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely.

Having an additional hunt open to non-residents would bring in more revenue to the state of Alaska as well as to local communities.

What is the issue you would like the board to address and why? A registration hunt for certified bowhunters only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 11 without having a negative impact on the resource. According to the Alaska Department of Fish and Game (ADF&G), from 2014 to 2018, only 1% of moose harvested in Unit 11 were taken with a bow. These reported archery harvests show the extremely low impact to moose populations. Lastly, having an additional hunt open to non-residents would give the opportunity for guides to sell additional hunts to certified bowhunters, therefore, bringing in more revenue to the State of Alaska as well as to local communities.

| PROPOSED BY: Alaskan Bowhunters Association | (EG-F20-062) |
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5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 13 as follows:

Resident Open Season (Subsistence and General Hunts)

Nonresident Open Season

Units and Bag Limits

(11)

Unit 13

1 moose per regulatory year, only as follows:

RESIDENT HUNTERS:

. . .

1 antlerless moose by drawing permit only in Unit 13(A); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf Oct. 1–Oct. 31 Mar. 1–Mar. 31 (General hunt only)

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within objectives.

This Unit 13 antlerless hunt was initially adopted in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. The hunt was modified when the board adopted an October and March season during the February 2013 board meeting.

Since the establishment of this hunt, the Department of Fish and Game (ADF&G) has issued 10 permits annually in Unit 13A. ADF&G intentionally limited the number of permits issued annually to gain public support for the hunt, even though a higher rate of cow harvest was desirable to regulate the moose population within objectives. After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed ADF&G to issue a sufficient number of permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit.

Moose have generally increased at an average rate of 2% per year in the intensive wolf management area over the past 10 years. The current population objective for Unit 13A is 3,500–4,200, and the population was estimated to be above objectives in 2015–2016 and within objectives

in 2017. The antlerless hunt in western Unit 13A is necessary to maintain the population within the intensive management objectives. The additional harvest provided by the hunt will also assist in achieving the harvest objectives for the population. If antlerless moose hunting opportunities are not reauthorized in Unit 13, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and achieves the harvest objectives recommended by the public, advisory committees, and the board.

PROPOSAL 59

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

Increase the community subsistence any bull moose hunt allocation in Unit 13 as follows:

Amend 5 AAC 85.045(a)(11) as follows:

1 moose per regulatory year, only as follows:

RESIDENT HUNTERS:

1 bull per harvest report by community harvest permit only; however, no more than <u>150</u> [100] bulls that do not meet antler restrictions for other resident hunts in the same area may be taken by Tier II permit in the entire community harvest area during the August 20 - September 20 season, up to 350 Tier II permits may be issued; or

What is the issue you would like the board to address and why? Increase community subsistence any bull moose hunt allocation from no more than 100 bulls that do not meet antler restrictions to 150 any bull moose.

This change is requested in order to address the fact that additional moose are needed in the community subsistence any bull moose hunt to provide for customary and traditional harvest and uses of moose by Alaska residents living in Unit 13.

PROPOSAL 60

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

Create a registration archery only hunt for bull moose in Unit 13 as follows:

Establish a registration archery only hunt for bull moose in Unit 13, that has requirements to commit to that specific hunt as the only moose hunt the hunter will participate in Alaska for that regulatory year; effectively redistributing those hunters to a specific time period not in competition with other moose hunters.

It is understood that the area biologist has concerns that adding this hunt may increase overall harvest of moose in the unit, which may impact bull cow ratios below what they would like to see.

In recognition of this and in an effort to minimize this potential; require commitment to this as the only specific moose hunt the hunter will participate in by making it a registration hunt that has tags only available prior to other moose seasons opening, placing the hunt five days after the regular general season in the unit closes will provide opportunity for some of the in season harvest reporting to be monitored and allowing emergency order restrictions reducing the hunt area as needed. It is unlikely that there will be a large influx of additional hunters that do not typically already hunt Unit 13 with the requirement that this is the only moose hunt they participate in. Additionally as you know typical archery hunt success is typically 10-20% of rifle hunter success.

By making it a registration hunt it provides the necessary controls for effective enforcement of the requirements of the hunt and allows the ability to more closely monitor participation and success rates. In exchange for the hunter commitment to the specific hunt with more primitive equipment that reduces success rate, they get a minor adjustment to the legal animal from the general season requirements.

Proposed draft regulatory language:

Hunt Details

Hunt Number: RM XXX Regulatory Year: 202X Hunt Type: Registration

Species: Moose

Legal Animal: One (1) bull moose with spike-fork or 50-inch antlers or antlers with three or more

brow tines on at least one side.

Season Dates: 09/25/202X – 10/15/202X

Residency Restrictions: Resident only

Reporting Requirements:

Successful Hunters report within five days of kill online, or in person to ADF&G.

Unsuccessful Hunters report online, by mail, or in person to ADF&G within 15 days of season end.

Hunting Conditions:

1) Permit: The RMXXX permit shall be in the possession of the permittee while hunting or transporting moose and shall be exhibited to any person authorized to enforce state and federal laws who requests to see it. The permit is NONTRANSFERABLE and cannot be proxy hunted.

Those who register for this hunt cannot obtain any other moose hunting authorization in Alaska, i.e. permit, harvest ticket, subsistence, community, etc. and cannot hunt moose anywhere else in Alaska during the regulatory year the permit is valid.

Permits available from ADF&G from July 1 to August 15.

2) Season: September 25 – October 15

3) Where: Unit 13

- 4) Bag Limit: One (1) bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only.
- 5) Method: Bow and arrow only. Bowhunter certification is required.
- 6) Penalty for Failure to Report: If you fail to report, you will not be eligible for any drawing, Tier II, or registration (including Tier I Nelchina caribou) permits the following regulatory year. In addition your name will be turned over to the Alaska Wildlife Troopers for enforcement action.

What is the issue you would like the board to address and why? Provide a specific bowhunting season in Unit 13 to distribute hunters across a greater length of time to reduce crowding and competition.

PROPOSAL 61

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

Establish a drawing permit hunt for bull moose limited to resident certified bowhunters only within Unit 13E as follows:

Institute a drawing permit hunt open to resident certified bowhunters only with the number of permits to be set by the Department of Fish and Game (ADF&G). This hunt would have the same season dates, area, and reporting requirements as DM339. This hunt would be for residents only and open to the take of any bull.

The purpose of this new hunt being a drawing permit hunt would be so that the ADF&G can monitor the participation and success rates more closely as well as determine the number of permits issued.

What is the issue you would like the board to address and why? A drawing permit hunt for certified bowhunters only would give more resident hunters the opportunity to spend time in the field pursuing moose within Unit 13 E without having a big impact on the resource. According to ADF&G, less than 1% of moose harvested in Unit 13 were taken with a bow from 2014 to 2018. These reported archery harvests show the extremely low impact to moose populations. According to the area biologist, Unit 13 moose populations are steady with Unit 13E being above objectives. Having a drawing permit hunt would allow ADF&G to collect data, closely monitor success rates, as well as determine the number of permits issued. Unit 13E currently has a drawing permit hunt open to nonresidents but no drawing permit hunts open to residents.

5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

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

5AAC 85.045(a)(11)

Resident Open Season

Units and Bag Limits (Subsistence and General Seagen)

General Season) N

Nonresident Open Season

(11)

Unit 13

1 moose per regulatory year, only as follows:

. . .

<u>1 antlerless moose by</u> drawing permit only in Unit

13(E);up to 200 permits may be issued; a person may not

take a cow accompanied by a calf

...

Oct. 1-Oct. 31 No open season (General hunt only)

What is the issue you would like the board to address and why? An Intensive Management plan for moose in Unit 13 is in effect, and antlerless moose hunts are a management tool that provides additional harvest opportunity when moose populations rise above objectives, and also gives the Department of Fish and Game the ability to maintain moose abundance within population objectives.

There has been an antlerless hunt in Unit 13A since 2012, but currently there are no other antlerless hunts in Unit 13.

Moose abundance in Unit 13E has increased from an index of less than 4,000 moose in 2000 to 6,400 moose in 2018 and 2019. The current population objective for Unit 13E is an index of 5,000–6,000 moose. The harvest objective for Unit 13E is 300–600 moose. Moose harvest over the past five years averages 200 moose annually, which represents the highest harvest numbers since 1998. Recent composition surveys indicate that the bull-to-cow ratio is approximately 25 bulls per 100 cows, which is the management objective for Unit 13E, indicating that there are not additional bulls available for harvest under the current Intensive Management program. An antlerless hunt in Unit 13E will allow the department to maintain the moose population within abundance objectives and composition objectives while providing additional harvest opportunity.

If antlerless moose hunting opportunities are not available for Unit 13E, the intensive management program and objectives will need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose, and the harvest objectives recommended by the public, advisory committees, and the board will need to be reevaluated.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F20-039)

5 AAC 92.050. Required permit hunt conditions and procedures.

5 AAC 92.072. Community subsistence harvest hunt and permit conditions.

Eliminate the restrictions of one harvest report per household and one bag limit per household in the community subsistence caribou hunt for Unit 13 as follows:

Amend 5 AAC 92.050(a)(4)(I) as follows:

No more than one Unit 13 Tier I subsistence permit for caribou may be issued per household every regulatory year, except as otherwise specified for community subsistence hunt harvest reports in 5 AAC 92.072(c)(2) and (d); the head of household, as defined in 5 AAC 92.071(b), and any member of the household obtaining a Unit 13 Tier I subsistence permit or community subsistence hunt harvest report in a regulatory year for caribou may not hunt caribou or moose in any other location in the state during that regulatory year; a community subsistence harvest report may be issued to all participating members of a participating household with the total bag limit for a household equal to the sum of the individual participants' bag limits as defined in 5 AAC 85.025(a)(8); [UP TO TWO CARIBOU MAY BE RETAINED PER HOUSEHOLD;]

Amend 5 AAC 92.072(c)(2)(A) as follows:

may not hold a harvest ticket or other state hunt permit for the same species where the bag limit is the same or for fewer animals during the same regulatory year; however, a person may hold harvest tickets or permits for same-species hunts in areas with a larger bag limit following the close of the season for the community harvest permit, except that in Unit 13, [PRIOR TO JULY 1, 2018, ONLY ONE CARIBOU MAY BE RETAINED PER HOUSEHOLD, AND ON OR AFTER JULY 1, 2018, a community subsistence harvest report may be issued to all participating members of a participating household with the total bag limit for a household equal to the sum of the individual participants' bag limits as defined in 5 AAC 85.025(a)(8); [UP TO TWO CARIBOU MAY BE RETAINED PER HOUSEHOLD;]

Amend 5 AAC 92.072(d) as follows:

Seasons for community harvest permits will be the same as those established for other subsistence harvests for that species in the geographic area included in a community harvest hunt area, unless separate community harvest hunt seasons are established. The total bag limit for a community harvest permit will be equal to the sum of the individual participants' bag limits[, ESTABLISHED FOR OTHER SUBSISTENCE HARVESTS FOR THAT SPECIES IN THE HUNT AREA OR OTHERWISE BY THE BOARD]. Seasons and bag limits may vary within a hunt area according to established subsistence regulations for different game management units or other geographic delineations in a hunt area, or as otherwise established by the board. In Unit 13, the total community subsistence caribou bag limit shall be equal to the sum of the individual participants' bag limits from all households participating in the community subsistence caribou hunt harvest report as determined by the board.

What is the issue you would like the board to address and why? Eliminate the restriction of one harvest report per household and one bag limit per household in the community subsistence

caribou hunt in Unit 13 (CC001). Allow all members of a household participating in the community subsistence caribou hunt to each to obtain a harvest report and bag limit.

These changes are requested in order to address the fact that one caribou per households is not enough to provide for customary and traditional harvest and uses of caribou by Alaska residents living in Unit 13.

PROPOSAL 64

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

Eliminate the salvage requirement for hide of moose for Alaska residents aged 60 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional as follows:

Amend 5 AAC 92.220(a)(6) as follows:

In addition to (d) of this section, the heart, liver, kidneys, and fat of caribou taken in 5 AAC 92.074(d) must be salvaged, and the head, heart, liver, kidneys, stomach and hide of moose taken in 5 AAC 92.074(d) must be salvaged, except that moose hide salvage is optional for Alaska residents aged 60 years or older;

What is the issue you would like the board to address and why? Eliminate the salvage requirement for hide of moose taken in the community subsistence moose hunt in 5 AAC 92.074(d) for Alaska residents aged 60 years and older, and instead make this salvage optional. This request is submitted on behalf of a number of Ahtna elders who indicated that the hide is too heavy for them to salvage at their ages.

PROPOSAL 65

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

Eliminate the moose hide salvage requirement for hunters aged 62 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional as follows:

HUNT TERMS AND CONDITIONS

Therefore, all participants in the Copper Basin moose community subsistence harvest hunt must salvage for human consumption: 1. the head, heart, liver, kidneys, stomach, and hide.

1(a). Transporting hide from the field is optional for CM300 participants who are 62 years and older.

2. meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

What is the issue you would like the board to address and why? Revise the CM300 hunt conditions requirement that transporting moose hide from the field is optional for CM300 hunters who are 62 years and older.

Carrying hide from the field is difficult for older hunters. Moose hide is extremely heavy and large to carry from the field. Hunters 62 years and older should have the option to either leave moose hide in the field or haul it from the field.

PROPOSAL 66

5 AAC 92.050(a)(4)(I). Required permit hunt conditions and procedures.

Clarify the Unit 13 Tier I subsistence caribou permit condition that members of a household may not hunt caribou or moose in any other state hunts in other locations as follows:

Add words: "any member of the household obtaining a Unit 13 Tier I subsistence permit in a regulatory year for caribou may not hunt caribou or moose in any **State** authorized hunt in any other location in the state during that regulatory year."

What is the issue you would like the board to address and why? Clarify regulation. Existing ambiguity in regulatory wording leads to a lack of agreement and understanding of the regulations.

Currently a regulatory condition of Unit 13 Tier I subsistence caribou permit states: "any member of the household obtaining a Unit 13 Tier I subsistence permit in a regulatory year for caribou may not hunt caribou or moose in any other location in the state during that regulatory year."

This has been interpreted to include limitations on federal subsistence hunts. In the federal subsistence hunt qualified rural residents can hunt moose and caribou in Units 11, 12 and 13. So if a federally qualified rural resident gets a Tier I state caribou tag, there is a question as to if that federally qualified rural resident could participate in a federal subsistence moose hunt in a different unit in which they qualify.

As the Board of Game regulatory authority covers state authorized hunts, there seems to be questionable legal validity for the state to place limits on federal subsistence hunt opportunities for which they have no legal control.

This interpretation leads to confusion, may create the legal liability for future lawsuits, and seems arbitrary in nature.

Simply adding the words: in any state authorized hunt.... would clarify this issue.

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

Change the salvage requirements for sheep taken in Unit 11 as follows:

I would like to see a meat-on-bone salvage requirement for the two front quarters and two rear quarters and ribs for all sheep taken from Unit 11.

What is the issue you would like the board to address and why? There should be a meat-on-bone salvage requirement for sheep coming from the Wrangell Mountains. Through casual conversations with enforcement personnel and personal observation, I fear there might be a trend towards light sheep in the Wrangell Mountains. A stricter salvage requirement would aid enforcement activities and ensure that the resource is adequately used.

Boning out sheep meat in the field is a very common practice for sheep hunters. It saves the hunter weight and space in their pack for the hike out of the field. Unfortunately, careless or novice hunters can do a poor job removing all the edible meat from the bones. If they are inspected, the enforcement officer has to recreate a full sheep from a bag of scraps. It seems that it would be hard to issue a citation for a light bag without locating the kill site.

Furthermore, meat on the bone is easier to keep dry and cool. Alaska mountain weather is unpredictable and wet, particularly later in the season. Hunters also have a long trip out. Keeping the meat on the bone would ensure that it is in good quality when it arrives to the place it will be processed.

PROPOSAL 68

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

Extend the general season for brown bear by bow and arrow only for residents and nonresidents within Unit 11 as follows:

Unit 11: <u>July 1 – August 9 by bow and arrow only; or</u> August 10 - June 30, one bear every regulatory year.

What is the issue you would like the board to address and why? Extending the general season for bow and arrow only would give more hunters the opportunity to spend time in the field pursuing bears within Unit 11 without having a negative impact on the resource. According to the Alaska Department of Fish and Game, only four of 55 brown bears were taken with a bow in the last five years. These reported archery harvests show the extremely low impact to the population.

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

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

A good solution would be to increase the grizzly harvest in Unit 13 to two per year. Many hunters pass on shooting smaller bears because they only have one per year limit and are hoping to find a larger one. With a two-bear limit, hunters would be more likely to take the first one they see, and possibly make them more selective on the second bear.

What is the issue you would like the board to address and why? The grizzly/brown bear population in Unit 13 continues to grow. Predation on moose and caribou in the area is high, and doing more to control the population will help to increase moose and caribou populations. Every year the numbers of bears seen, and bear sign grows, along with dozens of dead moose calves found in June during the calving season, and including full grown moose killed by grizzlies throughout the summer. Adding the baiting to Unit 13four or five years ago helped, but because a lot of the unit is way beyond reasonable for most people to keep barrels active, hunting pressure/harvest remains low.

PROPOSAL 70

5 AAC 85.020 Hunting seasons and bag limits for brown bear. 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

Open a fall baiting season in Unit 13 for brown and black bear as follows:

Brown bear and black bear may be taken over bait in Unit 13 from April 15 to June 30 and from August 20 to October 15 except that portion of Unit 13E that is Denali State Park. Hunting brown bear over bait from August 20 to October 15 will be by registration permit only. This hunt may be closed by emergency order if a harvest goal is met.

What is the issue you would like the board to address and why? We are proposing a fall bear baiting season in Unit 13 for both brown and black bears. There is a very high population of both brown and black bear in Unit 13 that are under-harvested because most of this unit is very remote and hard to access and a lot of it is heavily timbered. Many hunters who bait in the spring in this area report seeing five to ten bears on every bait station in this area. We would like to see a higher utilization of this game resource. The Department of Fish and Game has put video cameras on some brown bear in this area and some bears were observed killing or at least eating up to forty different moose and caribou in a very short period of time. Most of them calves. The Board of Game (board) has watched some of these videos. It can't hurt to take a few more of these bears. The board failed a similar proposal in February of 2015 that would have allowed fall baiting in subunit 13D for fear of over-harvest of brown bear. Some of us have hunted baited bears in the spring in this unit since 2014 and have found brown bears to be very smart and cautious around bait stations and almost always approach from far down wind. They are not easy to harvest this way. They are nothing like the bold and carefree black bears. Some of us have also baited brown bear in Unit 16 in the fall and found them to be the same in the fall there, with most coming in

after dark. There is a two brown bear bag limit in Unit 16 and there has not been a dramatically high brown bear harvest in this area, only a moderate one and the baiting season in Unit 16 runs from April 15 to October 15. We think there is almost no chance of over-harvest of brown bear on this hunt.

PROPOSAL 71

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

Lengthen the wolverine hunting season in Unit 13 as follows:

Extend wolverine hunting season in Unit 13 to the end of February.

What is the issue you would like the board to address and why? Currently wolverine hunting season opens September 1 and ends January 31. We would like to extend hunting of wolverine in Unit 13 to the end of February. You can shoot wolverine in Unit 12 until the end of March. There is no biological reason not to extend the season a couple more weeks to the end of February. Just provides more opportunity to get a wolverine if you are out. There are not a lot of wolverine taken in Unit 13 in September.

PROPOSAL 72

5 AAC 84.270. Furbearer trapping.

Extend the wolverine trapping season in Unit 13 as follows:

November 10th to **February 29th [FEBRUARY 15TH]**

What is the issue you would like the board to address and why? Extend the wolverine trapping season in Unit 13 from February 15 to February 29. Extending this season would allow for two more weeks of realistic trapping as the last 10 years have been generally late snow years and has not allowed travel by snowmachine until the middle of December. Setting a successful wolverine trapline requires long distances and longer bait exposure times than many of the other species trapped in the same areas. With no current limit, there should be no biological concern for allowing two more weeks of trapping.

5 AAC 84.270(14). Furbearer trapping.

Extend the wolverine trapping season in Unit 13 as follows:

Extend wolverine trapping season in Unit 13 to end at the end of February.

What is the issue you would like the board to address and why? Currently wolverine trapping season ends February 15. We would like to extend the trapping season for wolverine to the end of February, to match other trapping seasons in Unit 13. Federal Subsistence trapping season ends on February 28 and we would like to match that (going to end of February due to leap years).

There is a good chance of incidental catch with other sets still out that wolverines could get into. Many rivers in Unit 13 are not freezing up until January/February now so access to areas is later in the season and thus does not give much time to trap wolverine. You can shoot wolverine in Unit 12 until the end of March. There is no biological reason not to extend the season a couple more weeks to the end of February.

PROPOSAL 74

5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

Limit motorized access during the community subsistence moose hunt in Unit 13 as follows:

Moose: One bull with spike-fork antlers or over 50-inch antlers, or with four or more brow tines on either side.

<u>August 20 - 31</u>: No pack animals or motorized access except along the Parks, Richardson, Glenn, Denali Highways or Tok Cut-Off.

September 1-20: One bull with spike-fork or over 50-inch antlers, or four or more brow tines on either side.

Motorized access allowed (See Controlled Use exceptions.)

What is the issue you would like the board to address and why? Overcrowding of moose hunters in portions of Unit 13. Inequality among hunting groups. Ineffectiveness of present regulations to meet hunters of all categories needed.

This proposal addresses the hunt inequality and division that presently exists in Unit 13. The proposal also deals with the past and present inequality and ineffectiveness of the current ongoing community hunt which has failed to meet its' stated goals since its inception in spite of constant "fix-it" attempts.

We modeled our proposal in part after the very effective working model of the Unit 20 Macomb caribou hunt regulation. The Macomb hunt is a registration hunt that allows non-motorized access for both hunting groups to hunt either or both seasons without restriction. We chose not to place

a number of bulls that could be taken during the walk-in portion of the season. The local ADF&G biologist is best able to address that issue should it become necessary.

Our proposal restricts no one. Nor does it give any particular user group a defined advantage. Contingent for the success of these regulations the elimination of the community hunt in its entirety.

The unregulated advantage of this proposal is that local hunters will face less competition there hunting. Locals will be able to hunt almost any day of the season, whereas out-of-area hunters will need to travel substantial distances. Also, familiarity with local areas will offer residents a substantial step up on other groups. Additionally, rural users will still retain their federal hunt opportunities.

Information:

Sixty-three percent of successful local hunters used motorized transport to hunt moose. Ninety percent of out-of-area hunters used motorized transport.

One step further: a respondent quoted in Section 5 of Foraging and Motorized Mobility in Contemporary Alaska by ADF&G Subsistence Division (James Van Lane): "hundreds, if not thousands of hunters come to Unit 13 for the CSH. They come in \$100,000 motorhomes and they bring multiple \$10,000 all-terrain vehicles... They're competing with people who actually need the meat."

The community hunt was designed with the local population in mind. Our proposal gives them that opportunity in a workable format.

Without this regulation we will see the continuation of a very divisive and unsuccessful community subsistence hunt with the local needs far from being met.

PROPOSAL75

5 AAC 92. 5 AAC 92.075. Lawful methods of taking game.

5 AAC 92.540. Controlled use areas.

Close the Tokositna State Recreation Area in Units 13E and 16A to the use of airboats for hunting as follows:

The Tokositna State Recreation Area, except the Tokositna River, is closed to the use of airboats for hunting, between April 20 through September 30, annually.

What is the issue you would like the board to address and why? According to 11 AAC 20.985, the Tokositna State Recreation Area, except the Tokositna River, is closed to the use of airboats between April 20 and July 10 annually. The rationale for this regulation is to protect the habitat of trumpeter swans. I propose that the language in this regulation is revised and adopted into ADF&G regulations within 5 AAC 92.075 so that the Tokositna State Recreation Area, except the Tokositna River, be closed to the use of airboats from April 20 through September 30 annually. This change is to not only protect the bird habitat but also to prevent unfair chase of moose during hunting

season. Airboats draw so little water that they have the ability to jump riverbanks and leave navigable waterways to access miles of interconnected swamps where birds are nesting and moose are subsisting. This not only endangers the nesting habitat of migratory birds, it also constitutes unfair chase of moose during hunting season.

I am an Alaska resident since 1980, a recreationist and riverboater in the Tokositna Recreation Area, and a property owner on Bunco Lake near the Tokositna River. I have been hunting moose in this area for over 35 years. I have personally witnessed numerous infractions by airboat owners who disregard the laws and regulations, endanger the environment, destroy sensitive habitat, and thumb their noses to the ethics of fair chase. They jump the banks, use beaver dams as ramps, and destroy fragile vegetation as they pursue a moose using a motorized boat away from the navigable waterway.

PROPOSAL 76

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

Extend the ptarmigan season and the lower bag limit in Unit 13B and 13E as follows:

I understand the criticality of holding a stable population in an area and support that, but the changes last year were too dramatic in cutting the season so short. While I don't see any decrease in birds, I would suggest an alternative: decreasing the bag limit to five per day, per person, and increasing the time back to March 31, in both Unit 13B and 13E, areas that are susceptible to more traffic along the Denali and Richardson Highways.

Decreasing hunting opportunities is always bad for the sport, when populations are healthy. There are many new hunters coming into the sport that birds offer an opportunity to get those new hunters interested and active, and many of those used to hunt in the March season, when the temperatures and weather are a little more comfortable. I have rarely ever bagged ten birds in a day, and I don't know many people that do that consistently. This option gives us more time in the field with at least a chance at getting a few birds for dinner.

What is the issue you would like the board to address and why? Ptarmigan hunting. The season was recently cut back in Unit 13E to February 15 (was March 31). The season was increased in 13B to February 15, (was November 30). Numbers of birds have been stable and doing well in both units by my personal view, living in the middle of those units and being in the field more than 250 days a year for the last 11 years. Hunting pressure in the area has increased due to the increased caribou tags that have been put out in recent years, pushing the birds away from the roads, but they are still there.

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

Open a youth only hunt for ptarmigan in Unit 13, August 10-24 as follows:

Ptarmigan – Unit 13B: 10 per day; 20 in possession. Hunters under 16 (youth): August 10 – February 15 Hunters greater than 16: August 25 – February 15

What is the issue you would like the board to address and why? Ptarmigan seasons in Unit 13B. Ptarmigan season begins August 10 and goes through February 15. Ptarmigan hatch late in Unit 13B. The young birds are too small to eat – lots of waste in early birds. Opening the season later would help mitigate that.