

*Note: Proposal 265 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.*

**PROPOSAL 265**

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

Change the Unit 22E registration moose hunt to a drawing hunt with specific application conditions as follows:

Change RM855 to DM855. That it become a drawing hunt conducted by ADF&G in November - December 2022 for the 2023 season, at the latest. That registered guides may only submit as many applicants as there are tags allotted for the upcoming season. A hunter/ guide contract must be submitted as well. That an alternate list be established should a hunter back out for medical or personal reasons and the next eligible hunter would be contacted. If there are no alternate hunters that the tag would become available on a first come first served basis upon request. Basically, similar to how nonresident brown bear tags are issued on Kodiak.

I would make a special request that on July 7, 2022, that all applicants need to submit an application between 9 a.m. and 5 p.m. and ADF&G conduct a drawing so that it will be a fair distribution of these limited tags.

**What is the issue you would like the board to address and why?** As stated on page 123 of the current regulations for Unit 22E nonresident moose: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side by permit available online at <http://hunt.alaska.gov>, July 7 at 9 am. In red: permits issued on first come first-served basis (number of permits to be announced).

This does not allow hunters and guides reasonable time to plan a hunt with the season opening on September 1.

The area the last few years has had only one guide operating in the area. In 2020 there were two registered guides in the area conducting hunts. For the 2021 season four registered guides are currently registered in Unit 22E. The demand for the limited moose tags is significantly greater.

If the problem is not solved prior to the regular cycle, nonresident hunters will not be given reasonable or fair opportunity to obtain a permit. Internet speed and the age of the applicant could favor one hunter over another. The first online distribution of 10 tags in July 2021 required applicants to purchase a hunting license before attempting to obtain a tag; they then encountered confusing steps to select the tag, which in the end, all tags were distributed in under 30-seconds. There is no way to monitor if one applicant has several individuals applying on-line to obtain a tag for just this one person. Hunters should be given an equal playing field to obtain these tags and adequate time to plan a hunt. Contracting guides will also only be given seven weeks to prepare for their client's hunts as well.

This affects all nonresident moose hunters applying for RM855.

**PROPOSED BY:** Justin Horton

(HQ-F21-ACR2)

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*Note: Proposal 266 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.*

**PROPOSAL 266**

**5 AAC 92.450 (21)(C) and (21)(D). Description of game management units.**

Change the boundary for Game Management Units 21C and 21D to match the Koyukuk/Nowitna/Innoko National Wildlife Refuge designated guide use areas as follows:

The Koyukuk National Refuge is requesting to make a boundary change to the current Unit 21C/D boundary that lies within the southeastern corner of the Koyukuk National Wildlife Refuge. We would like this boundary to be shifted to the east to directly match our refuge boundary. (Maps are attached with the current boundaries and proposed changes).

By making this change, we feel this will aid in simplifying things for guides. We have talked with the local area biologist for ADF&G and he noted that he has no biological concerns or regulatory concerns. If this Unit boundary change is approved, we would work with the Alaska Commercial Services Board to make changes to the Guide Use Areas (GUAs). This would be in conjunction with the Refuge making specific changes to the Refuge Designated Guide Use Area (RDGUA) boundaries. The overall goal is to make it so there is a single game management unit (GMU) and GUA in each RDGUA.

*Note: The maps submitted with the proposals are available online at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-04-2022&meeting=fairbanks](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-04-2022&meeting=fairbanks).*

**What is the issue you would like the board to address and why?** On the Koyukuk National Wildlife Refuge, we offer guiding in six Refuge Designated Guide Use Areas (RDGUA's). For these RDGUA's, we have a competitive process where every 10 years applicants apply for these RDGUA's and the Refuge Manager selects one registered guide for each RDGUA. This process helps eliminate crowding, while allowing visitors to experience remote areas of the Koyukuk National Wildlife Refuge and providing commercial opportunities for registered guides. Currently on the Koyukuk National Wildlife Refuge, there are issues with registered guides not applying for certain RDGUA's. We have not had any applications for some of the RDGUA's in over 10 years. We feel this is due to the differing boundaries of the Game Management Units (GMU's), Guide Use Areas (GUA's), and the RDGUA's. By having multiple GMU's in the RDGUA's, guides are required to take additional tests to certify in new GMU's. This is a burden on the registered guides, and it would benefit all users by having these boundaries align.

The Koyukuk National Wildlife Refuge will be finalizing our selection for a guide in the affected RDGUA's for the 2023 hunting season in the Spring of 2023. If this issue is not addressed before the next regularly scheduled cycle, we will continue to have no applications for the RDGUA's and certain RDGUA's will remain vacant.

**PROPOSED BY:** Koyukuk/Nowitna/Innoko National Wildlife Refuge (HQ-F21-ACR3)

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*Note: Proposal 267 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.*

## **PROPOSAL 267**

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

Limit or restrict all nonresident sheep hunting in Unit 19C as follows:

Limit or restrict all nonresident sheep hunting in Unit 19C. Our preferred option would be for all current nonresident sheep hunting in Unit 19C to go to draw only, with a limited allocation of not more than 30 permits. With continuing sheep declines and high nonresident harvests, this would be a far better solution than going to draw only for everyone down the line – which is very likely if sheep don't rebound – and a subsequent draw only hunt for all with a 10 percent nonresident allocation of permits.

The Board of Game (board) really should have a framework in place so that before any resident sheep hunting opportunities can be limited or restricted; if nonresident hunting is allowed, then that component should always be addressed first. That didn't happen in Units 13D/14A in the Chugach when we had similar issues and conservation concerns. That didn't happen in Unit 19C in 2020 when the Department of Fish and Game (department) closed the subsistence sheep season.

**What is the issue you would like the board to address and why?** Continued sheep declines in Unit 19C, unlimited nonresident opportunity and increasing nonresident harvests.

The department had conservation concerns for the Unit 19C sheep population in 2020, enough so that the RC380 subsistence sheep hunt in the unit was canceled. No trend counts were able to be conducted in 2020 or 2021, but reports from guides and hunters in 2021, and department observations, show that the situation has not improved and in fact is likely worse .

The 2021 RC380 subsistence sheep hunt will nearly be eliminated, with no ewes allowed to be taken and a reduced quota of only two rams less than  $\frac{3}{4}$  curl.

Customary and traditional subsistence sheep hunting opportunities in Unit 19C were denied in 2020 and severely curtailed in 2021 over sheep conservation concerns, yet unlimited nonresident sheep hunting opportunities are still being allowed.

We are greatly concerned that a continued delay to address severe sheep declines in Unit 19C will lead to the area going draw only for all, or an emergency action by the department restricting sheep hunting for all, when the hunters taking the vast majority of the sheep harvest each year are nonresident hunters. Continued unlimited sheep hunting opportunity in Unit 19C, along with unlimited number of guides in the unit, has gone on too long and needs to be addressed before resident sheep hunting opportunities are limited or restricted. The same is true on the subsistence side when the department restricts subsistence sheep hunting opportunities because of ongoing sheep conservation concerns in Unit 19C. The current dynamics with the sheep population and unlimited nonresident sheep hunting opportunity is not beneficial to any group, including guides and their nonresident clients.

The unanticipated postponement by a year of in-cycle board meetings due to the ongoing pandemic has further pushed this issue to the Region III (Interior Eastern Arctic Region) 2024 meeting. Continuing to wait until the in-cycle regional meeting to address this issue could lead to all resident hunters losing opportunities should the sheep population continue to decline. The board should address this issue at one of the 2022 regulatory meetings.

The board considered a similar ACR in 2020 submitted by a longtime guide in Unit 19C who relayed that he'd witnessed severe sheep declines and requested that all sheep hunting in Unit 19C (for both residents and nonresidents) be restricted for two years. At that 2020 ACR meeting, the board heard testimony from the department in which sheep data was presented showing that "a likely decline of 40% to 60% has occurred in 19C." The department also canceled the 2020 RC380 subsistence sheep hunt in Unit 19C due to conservation concerns. That ACR was voted down 2-5.

The new information is that in Unit 19C (and statewide), sheep numbers are even lower and less legal rams were available in 2021. Also, the percentage of sub-legal sheep that went through the Anchorage office in 2021 was >10 percent, with sub-legal take evenly split between guided and unguided hunters.

Some of the declines and less available full-curl rams in 2021 can be attributed to previous bad winters and low recruitment, but overall we are seeing different weather patterns and warmer, wetter winters that will exacerbate declines and lead to decreased sheep habitat.

Since 2016, Resident Hunters of Alaska (RHAK) has submitted proposals to the board regarding conservation concerns for the Unit 19C sheep population and continued unlimited nonresident sheep hunting and harvests in Unit 19C. The vast majority of sheep harvests in Unit 19C are from nonresident guided hunters, and with continued sheep declines in the unit the percentage of nonresident harvests has only increased. In 2021, preliminary data for Unit 19C is that there were a total of 97 sheep hunters, 58 nonresident, and 39 resident. Total sheep hunters overall in Unit 19C continues to decline, which correlates with decreased involvement due to sheep hunters recognizing poor sheep population dynamics. **Nonresident sheep hunters accounted for 60 percent of total sheep hunters in Unit 19C in 2021 and took 85 percent of the total harvest.** (See department data below). There are no limits on guides in Unit 19C or nonresident hunters required to hire a guide. This same scenario of unlimited guides and nonresident hunters led to the loss of general hunting opportunity for all in the Chugach in 2009. This has been our concern all along, that the board would wait too long to impose limits on nonresident hunters, until the situation became more concerning and it went to draw only for all, with residents again losing opportunity when resident hunting was far and away much less of an impact on sheep harvests.

RHAK fully understands that the root of these sheep declines in Unit 19C and elsewhere across the state are the result of changing weather patterns and bad winter conditions, avalanches, drownings, predation etc. We have no real means to control non-human predation, as sheep are not included in our Intensive Management species. The main non-human predators of sheep are golden eagles, which are federally protected. **The one thing we can control, however, is the human component.**

**To be clear, we are not intimating that limiting nonresident sheep hunters in Unit 19C will somehow lead to increased sheep populations.** In other areas with longstanding draw-only sheep

hunting opportunities with limited allocations for all, sheep populations have declined. Available tags are being decreased due to conservation concerns or meeting the management goals.

**What we are saying, is that limiting nonresident opportunity now will lead to less sheep mortality overall and help prevent the loss of resident sheep hunting opportunities down the line (including subsistence sheep hunts) should the sheep population not rebound.**

We recognize that the management strategy for Unit 19C is to provide maximum sheep hunting opportunity, given the department’s continued position that the full-curl management regime is sustainable in areas where unlimited sheep hunting opportunity is allowed. But in other units with the same management strategy, sheep hunts have gone to draw only because of sheep conservation concerns. It isn’t at all far-fetched to believe the same could happen in Unit 19C. Continued unlimited nonresident sheep hunting opportunity and increasing nonresident harvests in Unit 19C should be addressed now.

**ADF&G Data 19 C sheep harvests 2017-2021 (\*2021 data is preliminary)**

	N	R	Total killed
2017	61	46	107
2018	79	39	118
2019	75	39	114
2020	53	14	67
2021	33	6	39

(\*Total # of sheep hunters in 2021 was 97, with 58 nonresident and 39 resident)

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F21-ACR4)

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*Note: Proposal 268 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.*

**PROPOSAL 268**

**5 AAC 92.029(b). Permit for possession live game.**

Prohibit the possession of swine other than *Sus scrofa domesticus* as follows.

**5 AAC 92.029(b):** The following species, not including a hybrid of a game animal and a species listed in this subsection, may be possessed, imported, exported, bought, sold, or traded without a permit from the department but may not be released into the wild.

<b>Common Name</b>	<b>Scientific Name</b>
...	
Swine	<u><i>Sus scrofa domesticus</i></u> [ <i>SUS SCROFA</i> VAR.]

**WHAT IS THE ISSUE YOU WOULD LIKE THE BOARD TO ADDRESS AND WHY?**

The existing language in 5 AAC 92.029 allows for all types of swine (*Sus scrofa* Var.) to be possessed in Alaska and causes concern for both the Department of Environmental Conservation and the Department of Fish and Game (department). Boars are known to severely impact habitats for which they are not native and are particularly adept at escaping confinement. Boars can also reproduce rapidly and produce multiple young per litter; and have the ability to thrive in high latitude environments such as Alaska. Other states have been overrun with boars and removal, once established, has proved difficult to impossible. Boars also carry the disease Pseudorabies which lynx, and other mammals, are susceptible to.

The department has received inquiries from the public about importing particular types of swine which are known to thrive at high latitudes and severely impact habitats for which they are not native. The department does have a biological concern for all species because feral boars represent a threat to indigenous wildlife and their habitats. It is unknown if the Board of Game intended to allow only domestic swine, such as those commonly found in farming operations, or if the intent was to allow all types of swine and the department would like clarification.

**PROPOSED BY:** Alaska Department of Fish & Game (HQ-F21-ACR5)  
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*Note: Proposal 269 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.*

**PROPOSAL 269**

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

Create a tiered hunt structure and open a hunt for the Unimak Island caribou herd as follows:

Establish a hunt for caribou in Unit 10. The Department of Fish and Game recommends a tiered hunt structure, with specific allocations to be determined pending the outcome of Proposal 26 scheduled for the January 2022 Board of Game meeting.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(5)		
Unit 10, Unimak Island only	[NO OPEN SEASON.]	[NO OPEN SEASON.]

**If the harvestable portion is  
XX caribou or less:**

**RESIDENT HUNTERS:**

**No open season.**

**NONRESIDENT HUNTERS:**

**No open season.**

**If the harvestable portion is  
greater than XX, but less  
than XX caribou:**

**RESIDENT HUNTERS:**

**1 bull by registration permit only**

**Aug. 1–Sept. 30**

**Nov. 15–Mar. 31**

**NONRESIDENT HUNTERS:**

**1 bull by registration permit only**

**Aug. 1–Sept. 30**

**Nov. 15–Dec. 31**

**If the harvestable portion is  
greater than XX, but less  
than XX caribou:**

**RESIDENT HUNTERS:**

**3 caribou**

**Aug. 1–Sept. 30**

**Nov. 15–Mar. 31**

**NONRESIDENT HUNTERS:**

**3 caribou**

**Aug. 1–Sept. 30**

**Nov. 15–Dec. 31**

**If the harvestable portion is  
greater than XX:**

**RESIDENT HUNTERS:**

**4 caribou**

**Aug. 1–Sept. 30**

**Nov. 15–Mar. 31**

**NONRESIDENT HUNTERS:**

**4 caribou**

**Aug. 1–Sept. 30**

**Nov. 15–Dec. 31**

**WHAT IS THE ISSUE YOU WOULD LIKE THE BOARD TO ADDRESS AND WHY?**

Pending board action on Proposal 26 regarding a customary and traditional use determination for the Unimak Island caribou herd, this proposal, if passed, will provide an opportunity to increase caribou harvest on Unimak Island (Unit 10) and should not be delayed. High bull to cow and calf to cow ratios and an annual increase in the population by 10% annually can immediately provide a harvestable surplus of 10–25 bulls. Historically, the remoteness of the herd and small human population has not provided the level of harvest necessary to contain the herd within carrying capacity, which has led to declines in population and habitat quality.

A harvestable surplus exists on the UCH for the first time in a number of years and this opportunity should be taken advantage of to provide hunting opportunities while controlling the trajectory of an increasing herd.

If the problem is not solved prior to the regular cycle, state harvest opportunity would be lost but federal opportunity would remain or increase since most Unimak Island is federal land. This proposal seeks to arrest growth of the herd.

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

(HQ-F21-ACR6)

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*Note: Proposal 270 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.*

**PROPOSAL 270**

**5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Open an antlerless moose hunt in a portion of Unit 20E as follows:

**Unit 20E – that portion within the Ladue River drainage upstream of but excluding the South Fork of the Ladue River, the Dennison Fork of the Fortymile River drainage excluding the East Fork drainage, and the Mosquito Fork of the Fortymile River drainage.**

**Resident and Nonresident Hunters**

**August 5 – September 5 and October 15 – November 30**

**1 antlerless moose by youth drawing permit only; up to 100 permits may be issued; a person may not take a cow accompanied by a calf; OR**

**Resident Hunters**

**October 15 – November 30**

**1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf.**

**WHAT IS THE ISSUE YOU WOULD LIKE THE BOARD TO ADDRESS AND WHY?**

The moose population within a portion of southern Unit 20E has shown consistent growth since 2005 and has approximately doubled since then, with the cow component of the population growing at a significantly faster rate than the bull component of the population. Limited antlerless harvest would: 1) slow population growth to avoid habitat damage while ensuring long-term sustainability of the population and the increased yield it is currently capable of supporting, 2) help achieve intensive management (IM) harvest objectives, and 3) provide the management flexibility to rapidly respond to changes in nutrition.

As this population approaches carrying capacity, stabilizing growth will prevent long-term damage to habitat and help to ensure a high yield that is sustainable long-term. The population is currently healthy, however taking this action will reduce the likelihood of having to reduce the population with limited options in the future. Implementing an antlerless hunt in this area will begin a process that will allow hunt managers to slow population growth.

There are several aspects of this population that warrant immediate attention:

First, the moose population has grown steadily since 2005. Moose densities within a 1,821 mile<sup>2</sup> area along the Taylor Highway in southern Unit 20E increased from 0.68 moose/mi<sup>2</sup> in 2005 to 1.36 moose/mi<sup>2</sup> in 2020, with an estimated annual growth rate of 4.9%. The cow segment of the population grew at an estimated 5.8% per year while the bull segment of the population, which is limited by higher natural mortality and harvest, grew at half the rate. Reducing the population

growth rate will increasingly be dependent on the ability to control the growth of the female component of the population. Although twinning rates are currently nominally healthy at 39% (2018-2021 3-year weighted average), the department is closely monitoring them given the potential for twinning rates to lag as a reflection of population-level nutritional condition.

Second, if current population growth rates continue, the ability to stabilize or reduce the population in the future might be inhibited by social and logistical issues. Although portions of the area are road accessible, large portions are more remote; therefore, it may take some time to develop the capacity to effectively harvest cows within the area. This request would allow for more incremental change that could potentially preempt more rapid and severe management action that may be necessary to address changes in nutritional condition if the current growth rate continues unabated.

This request would allow for antlerless harvest opportunity. Delaying regulatory action now may increase the potential for the moose population to exceed carrying capacity. This could result in the need for larger harvests that can often become socially difficult to implement. Furthermore, delayed action could result in density-dependent changes to demography and abundance that reduce yield through loss of productivity or density-dependent mortality.

The purpose of this request is to allow for antlerless harvest opportunity within a portion of Unit 20E, independent of final allocative decisions. Although the proposed regulations contain allocative components, as do all harvest regulations, the proposed allocation aligns with other antlerless moose youth and regular draw permits. The proposed antlerless harvest opportunity would be open to residents and nonresidents for the youth permit and for residents only for the regular draw permit.

**PROPOSED BY:** Alaska Department of Fish & Game (HQ-F21-ACR7)

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