

# **Glennallen Area Proposals – Units 11 & 13**

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## **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 Kukulana Glacier, west of the Kukulana 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.

**PROPOSED BY:** Tim Nelson (EG-F20-004)  
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## **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.)

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-026)

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**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] **500** 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.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-023)

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**PROPOSAL 54**

**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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**PROPOSAL 55**

**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 **August 10th to November 15th** [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.

**PROPOSED BY:** Herb Mansavage (HQ-F20-016)

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**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.

**PROPOSED BY:** Gary Weaver (EG-F20-049)

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**PROPOSAL 57**

**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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**PROPOSAL 58**

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

Reauthorize the antlerless moose seasons in Unit 13 as follows:

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

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-41)  
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**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 **150** [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.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-024)  
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**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.

**PROPOSED BY:** John Linnell (EG-F20-038)

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**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.

**PROPOSED BY:** Gary Weaver (EG-F20-050)

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**PROPOSAL 62**

**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)**

**Units and Bag Limits**

(11)

Unit 13

1 moose per regulatory year,  
only as follows:

...

**1 antlerless moose by 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**

...

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

**Nonresident Open Season**

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

**No open season**

**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)

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## **PROPOSAL 63**

**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.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-027)  
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**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.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-025)  
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**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.

**PROPOSED BY:** Ahtna Tene Nene' (EG-F20-037)

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**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.

**PROPOSED BY:** Copper Basin Advisory Committee (EG-F19-158)

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**PROPOSAL 67**

**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.

**PROPOSED BY:** Seth Wilson (EG-F20-137)  
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**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: **July 1 – August 9 by bow and arrow only; or** 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.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F20-097)  
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**PROPOSAL 69**

**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 13 four 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.

**PROPOSED BY:** Claude Bondy (EG-F19-143)

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**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.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-010)  
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**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.

**PROPOSED BY:** Copper Basin Advisory Committee (EG-F19-156)  
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**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.

**PROPOSED BY:** Herb Mansavage (HQ-F20-014)  
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**PROPOSAL 73**

**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.

**PROPOSED BY:** Copper Basin Advisory Committee (EG-F19-155)

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**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.

August 20 – 31: 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.

**PROPOSED BY:** Paxson Fish and Game Advisory Committee (EG-F20-011)  
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**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.

**PROPOSED BY:** Vincent Pokryfki (EG-F20-015)

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**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.

**PROPOSED BY:** Claude Bondy (EG-F19-144)

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**PROPOSAL 77**

**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.

**PROPOSED BY:** Paxson Fish and Game Advisory Committee (EG-F20-010)

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**PROPOSAL 209**

**5 AAC 85.010(a)(1) Hunting seasons and bag limits for bison.**

Modify the Copper River bison harvest opportunity in Units 11 and 13D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(1)		
...		
Unit 11, east of the Copper River, south of the Klawasi River, and west of a line from Mount Sanford to Mount Wrangell to Long Glacier, and west of the Kotsina River, and that portion of Unit 13(D) east of the Edgerton Highway	Sept. 1 – Mar. 31 (General hunt only)	Sept. 1 – Mar. 31 (General hunt only)
1 bison every 10 regulatory years by drawing permit only; up to <b><u>50 permits</u></b> [24 permits] may be issued.		
...		

**What is the issue you would like the board to address and why?** This proposal seeks to increase the number of permits allowable for the Copper River bison hunt in Units 11 and 13D (DI454) to provide additional harvest opportunity for resident and nonresident hunters in response to a growing bison population. The Copper River bison herd has been slowly increasing in abundance from an average of 70 animals in the mid 1990’s to an average of 181 animals over the past five years. The maximum number of permits (24) have been issued annually since 2004, except for 2008 (18 permits) and 2012 (15 permits). Due to an administrative error, there were 30 permits issued in 2017 and 45 permits issued in 2018. Over the past 10 years, permit success averages 38% and hunter success averages 56%, but harvest (average of 10 animals annually) does not optimize the harvestable surplus under maximum sustained yield as the herd grows. Additional permits will allow for additional sustainable bison hunting opportunities and will provide the tools to adjust the trajectory of the herd and prevent negative impacts of increased bison abundance on the range.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F21-20)  
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**PROPOSAL 210**

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

Eliminate the community subsistence harvest moose hunts in Unit 13 as follows.

Eliminate the community harvest moose hunts in Unit 13. General season moose hunt for all should be September 1st to September 20th.

**What is the issue you would like the board to address and why?** Discontinue community harvest moose hunts. This hunt, in its sixth or seventh year has destroyed the moose population in Unit 13. My family has survived off Unit 13 moose for 20 years continuously. On and off we have lived off them since 1961. We have gone two years, hunting every day of the 20-day season without seeing a legal moose. The community hunt is putting too much pressure on moose, and since they can also harvest spike-fork or 50", 4 brow tines moose before the general season without it counting on the community harvest quota, there is increase pressure on those moose, thus removing them from the woods before the general season. I live in the middle of Unit 13, and this fall, for the first time in 20 years, I will be forced to travel to other areas to harvest moose meat. Tier I caribou tied to moose in Unit 13 also has put added pressure on moose in Unit 13.

**PROPOSED BY:** Claude Bondy (EG-F21-005)  
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**PROPOSAL 211**

**5 AAC 92.074. Community subsistence harvest hunt areas.**

Repeal the Copper Basin area community subsistence harvest hunt area for moose and caribou as follows:

Repeal 5 AAC 92.074(d)(1) - (13)

The Alaska Board of Game would then implement **AS 16.05.258. Subsistence use and allocation of fish and game** consistent with **Article 8, Section 3. Common Use** under 5 AAC 92.070 - 71 whenever a reasonable opportunity for harvesting amounts necessary for subsistence are not being met.

**What is the issue you would like the board to address and why?** Repeal the **Gulkana, Cantwell, Chistochina, Gakona, Mentesta, Tazlina, Chitina, and Kluti Kash Community Harvest Area for moose and caribou 5 AAC 92.074(d)**; it has not achieved the goal intended by the Board of Game (board) when it was adopted. In 2006 the board assumed that under the current Tier I & II system (5 AAC 92.070 and .071) hunting permits had shifted from the most dependent local residents to less subsistence dependent urban residence. The board took action to provide local communities in the Copper Basin with a priority to hunt moose and caribou. The board's action was challenged in state court and determined to be unconstitutional, **Alaska State Constitution, Article VIII. Sec. 3 Common Use**.

After 15 years of implementation by ADF&G, the proposers of the proposal to create the Copper Basin Community harvest area are achieving their original request to the board on federal lands through the Federal Subsistence Board.

Federal law, ANILCA Title I, Sec.101(b)(C) allows for Ahtna Intertribal Resource Commission (AITRC) to achieve their goal of exclusive community member moose and caribou hunts on federal lands in Units 11, 12, and 13.

**PROPOSED BY:** Alaska Outdoor Council (EG-F21-038)

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*Note: The following proposal is an updated submission for Proposal 66. It was submitted by the proposal deadline for the 2020/2021 proposal book to replace the original submission, but was inadvertently omitted.*

**PROPOSAL 212**

**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:

The regulatory condition of the Unit 13 Tier I subsistence caribou permit should read:

“No more than one Unit 13 Tier I subsistence permit for caribou may be issued per household every regulatory year, the head of the household, as defined in 5 AAC 92.071 (b), and any member of the household obtaining a Unit 13 Tier I subsistence permit in a regulatory year for caribou may not hunt caribou or moose **in any 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?** There is ambiguity in regulatory wording that leads to a lack of agreement and understanding of the regulation. The current interpretation by the Department of Fish and Game (as found in their Subsistence Permit Hunt Supplement) seems to exceed the rule making authority of the board.

A regulatory condition of the Unit 13 Tier I subsistence caribou permit states, in part: “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 condition should only apply to state hunts, which are under the authority of the board.

The department has interpreted this to include limitations on federal subsistence hunts. Their hunt supplement states: “If you apply for this hunt, you and your household cannot participate in federal hunts for caribou or moose outside of Unit 13”. As the board’s regulatory authority covers state authorized hunts, there is questionable legal validity for the board to place limits on federal subsistence hunt opportunities for which they have no legal control. It would be beyond “the scope of authority conferred” (Chapter 62. Administrative Procedures Act, Sec. 44.62.020, Authority to adopt, administer, or enforce regulations). For the department’s interpretation to be valid and enforceable, it seems that the board would need the authority to regulate federal subsistence hunt opportunities; this authority would need to be delegated by the Federal Subsistence Board.

The current interpretation by the department leads to confusion, may lead to unwarranted citations, legal liability, and future lawsuits, and also seems arbitrary in nature. The purpose of the regulation was to reduce overcrowding and excessive pressure on the resources. Currently, a limited number of federal subsistence hunters do not apply for the Unit 13 Tier I subsistence caribou hunt because they may want to hunt moose outside of Unit 13, perhaps to avoid the crowds that still persist. This relatively low number of additional federal subsistence hunters that could participate in the Unit 13 Tier I hunt would likely have no significant impact to the purpose of reducing excessive crowding and pressure. It is not “reasonably necessary to carry out the purpose of the statute” (Chapter 62. Administrative Procedures Act, Sec. 44.62.030, Consistency between regulation and statute.).

In addition, there is inconsistent application by the department of regulations between game and fish. In a very similar manner of regulatory language, 5 AAC 77.591 Copper River Personal Use Dip Net Salmon Fishery Management Plan states, in part: “A household may not be issued both a Copper River subsistence salmon fishing permit and a Chitina Subdistrict personal use salmon permit.” Historically, the department has not interpreted this to mean that if one gets a state Chitina Subdistrict personal use salmon fishing permit, then that person would be ineligible for a federal subsistence fishing permit in the Copper River. It is implicit that this condition applies only to the fisheries under the authority of the department.

**PROPOSED BY:** Copper Basin Advisory Committee (HQ-F21-007)  
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**PROPOSAL 213**

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

Remove the requirement for Tier I caribou hunters to hunt moose in Unit 13 as follows:

The solution would be to remove the requirement that Alaskans would have to hunt moose in Unit 13, or remove Tier I altogether and manage the population with increased draw tags and increased Tier II tags.

**What is the issue you would like the board to address and why?** I would like to see the removal of the requirement to hunt moose in Unit 13 if an individual receives a Tier I caribou permit. The purpose of this requirement has failed in its intention to limit Alaskans who apply for these permits. With the closures of federal land in Unit 13, this has compounded the crowding and user conflicts that is the cause of the Unit 13 land closures. The removal of this requirement will spread out users and lower conflicts in this area and allow Alaskans increased opportunities throughout Alaska.

**PROPOSED BY:** Caleb Martin (EG-F21-039)  
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**PROPOSAL 214**

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

Eliminate all moose drawing permit hunts in Unit 13 as follows:

Eliminate all moose draw permit hunts in Unit 13 and comply with Section 16.05.258, if there is a shortage of resources.

**What is the issue you would like the board to address and why?** Eliminate all moose draw permit hunts in Unit 13.

Remove DM324 for resident hunt for antlerless moose with season dates of October 1 – October 31 and March 1 - March 31.

Remove resident hunt DM324 for one bull with season date of October 1- October 31.

Remove nonresident hunt DM335 - DM339 for one bull with 50-inch antlers or antlers with 4 or more brow tine on at least one side with season date September 1 – September 30.

The young bull moose population in Unit 13 is low. It is at or below management objectives in three of the subunits of Unit 13.

In Unit 13A the moose population has shown a slight decline in the past three to four years. The ratio of yearlings to cows is 2.8 per 100 cows. It is below ideal ratio of ten yearlings to 100 cows.

The moose population has dropped to the mid-point in the management objective. The mid-point population is the trigger to conduct a wolf control program. Due to a low moose count, the predator control program for wolves in Unit 13B has been ongoing since last year to reduce the wolf predation. Unit 13A has been added to the wolf program because it is adjacent to Unit 13B and also has a low yearling count.

Both Unit 13B and Unit 13D are below the moose management objectives. The moose are 1,000 under the management objective in Unit 13B.

Draw hunt permits must be eliminated to conserve the moose population. Subsistence law, Section 16.05.258, are in place to give priority to subsistence hunters in times of a shortage of the resource. Community Subsistence Harvest Tier II hunters are harvesting less moose in the field during the hunting season which may be due to low moose population.

With a low yearling count and below management objective moose count (-1,000), it is necessary to eliminate all Unit 13 moose draw hunts. ADF&G must take action to protect moose numbers and protect subsistence rights and eliminating all Unit 13 draw permit hunts will do so.

DM324 – bull moose hunt in October month needs to be removed. Hunting moose during the rutting season when moose are vulnerable and meat is not edible shouldn't be allowed in regulation. Moose will be needlessly killed and meat will be inedible.

**PROPOSED BY:** Ahtna Tene Nene' (HQ-F21-01)  
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**PROPOSAL 215**

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

Reauthorize the antlerless moose seasons in Unit 13A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(11)		
Unit 13		
1 moose per regulatory year, only as follows:		
...		
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; or	Oct. 1–Oct. 31 Mar. 1–Mar. 31 (General hunt only)	No open season
...		

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the Board of Game. 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 of Game adopted an October and March season during the February 2013 board meeting.

Since the inception of this hunt, the Alaska Department of Fish and Game (ADF&G) has issued 10 permits annually for a hunt 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 enough permits to allow the harvest of up to one percent of the cow population, when the moose population is above the midpoint of the population objective for the subunit. There were 20 permits issued for RY20 and 25 permits were issued for RY21.

Moose abundance has fluctuated in Unit 13A 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 2017–2020. 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 to achieve the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F21-028)

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**PROPOSAL 216**

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

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

<b>Units and Bag Limits</b> (11)	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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Unit 13  
1 moose per regulatory year,  
only as follows:

...

<b><u>1 antlerless moose by drawing permit only in Unit 13(C); up to 200 permits may be issued; a person may not take a calf, or a cow accompanied by a calf</u></b>	<b><u>Oct. 1–Oct. 31 (General hunt only)</u></b>	<b><u>No open season</u></b>
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...

**What is the issue you would like the board to address and why?** To maintain moose populations within their population and sex ratio objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities.

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence of 300–600 moose.

The current population abundance objective for Unit 13C is 2,000–3,000 moose. Moose abundance in Unit 13C has increased from less than 2,000 moose in 2004 to more than 3,300 moose in 2019 and 2020. The current abundance is in line with the peak observed for the Unit 13C population in

the late 1980s and late 1990s. Most recently the population peaked between 3,800 and 4,000 moose in 2014–2016 and then declined, supporting the long-term observations that suggest that Unit 13C cannot sustain those levels of moose abundance over the long-term. The calf-to-cow ratio in Unit 13C has shown a declining trend over the past decade, which is typical of an ungulate population as it becomes less productive when the population approaches the carrying capacity of the area.

The harvest objective for Unit 13C is 155–350 moose. Moose harvest in this subunit over the past five years averages 98 moose annually, which represents the highest harvest numbers since 1998. Recent composition surveys indicate that the bull-to-cow ratio has been hovering at or below 25 bulls per 100 cows, (the current objective for Unit 13C) indicating that there are no additional bulls available for harvest under the current intensive management program. An antlerless hunt in Unit 13C will allow the Alaska Department of Fish and Game to maintain the moose population within abundance objectives and composition objectives. Stabilizing the population within the objectives will allow for a more productive population, producing more bulls as well as cows for an increase in overall harvestable surplus.

If antlerless moose hunting opportunities are not available for Unit 13C, 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-F21-21)  
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**PROPOSAL 217**

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

Eliminate all caribou drawing permit hunts in Unit 13 as follows:

Eliminate draw permit hunts in Game Management Unit 13 for Nelchina caribou and comply with Section 16.05.258 regulatory law and criteria.

**What is the issue you would like the board to address and why?** Remove all Unit 13 caribou draw permit hunts from the regulations. Remove resident draw permit hunt DC485 with a season of August 20 – September 20 and October 21-March 31.

Remove nonresident draw permit hunt DC475 with a season of August 20 – September 20 regulations.

Unit 13 Nelchina Caribou calf survival is below management objective.

This past year DC485 was closed on January 10, 2021, RC561, RC562 and CC001 were closed on January 22, 2021. Unit 13 Nelchina caribou season was closed due to overharvest by draw permits, and Tier I permit hunt.

Good snow conditions, warm winter, and the Nelchina caribou herd staying in Unit 13 throughout the winter provided easy access to harvest caribou. Consequently, ADF&G deemed it best to combine CC001, RC561 and RC562 and closed the caribou season.

Draw hunt permittees were allowed to harvest 817 Nelchina caribou and CC001 hunters were only allowed to harvest 292 caribou before the Unit 13 caribou hunting season was closed.

Section 16.05.258 was not complied with, whenever consumptive uses for caribou cannot be met for all users, subsistence Tier II criteria must be applied. CC001 hunt quota was not reached (400 quota), yet CC001 subsistence hunt was closed before the season ended. The draw hunt was kept open far too long. The draw hunt should have been closed in January 2021, and CC001 should have been kept open until March 31st.

Eliminate the draw permit hunts for Unit 13 Nelchina caribou and comply with Section 16.05.095 subsistence laws whenever a decision is to be made to close the caribou hunting season.

**PROPOSED BY:** Ahtna Tene Nene' (HQ-F21-02)

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**PROPOSAL 218**

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

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

Unit 13: Allow two grizzlies per regulatory year to be taken.

**What is the issue you would like the board to address and why?** Grizzly populations in Unit 13 are very high and having a detrimental effect on moose populations, particularly in Unit 13B. On an average spring I will find dozens of dead moose calves, uneaten, and killed by grizzlies. In the last ten years, populations have at least doubled. Allowing baiting to be legal a few years ago has helped, but we are still gaining bears. Many hunters after moose and caribou will pass on shooting a grizzly incidentally unless they see a large one. But if two grizzlies were allowed to be harvested, those hunters would be more likely to shoot the first legal grizzly seen, and then hold out for a bigger one on their second one.

**PROPOSED BY:** Claude Bondy (EG-F21-006)

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**PROPOSAL 219**

**5AAC 92.121. Intensive Management Plan V.**

Modify the Unit 13 predation control program as follows:

**5 AAC 92.121. Intensive Management Plan V** (b) is amended as follows:

(b) **Unit 13 Predation Control Area**. the Unit 13 Predation Control Area is established and consists of all lands within Units 13(A), 13(B), 13(C), **13(D)**, and that portion of Unit 13(E) east of the Alaska Railroad, except National Park Service and other federal lands where same-day-

airborne take of wildlife is not allowed, encompassing approximately **21,066** [15,413] square miles;

(1) This is a continuing control program that was first authorized by the board in 2000 for wolf control; it is currently designed to increase moose numbers and harvest by reducing predation on moose by wolves, **thereby improving recruitment rates**, and is expected to make a contribution to achieving the intensive management (IM) objectives in Unit 13;

(2) Moose and wolf objectives are as follows:

(A) Moose IM objectives for Units 13(A), 13(B), 13(C), **13(D)**, and 13(E) as established in 5 AAC 92.108 are 3,500–4,200, 5,300–6,300, 2,000–3,000, **1,200–1,900**, and 5,000–6,000 moose respectively; [THESE OBJECTIVES ARE BELOW THE MAXIMUM MOOSE NUMBERS ESTIMATED IN THESE AREAS BETWEEN 1987 AND 1989 AND ARE LIKELY ATTAINABLE GIVEN THE HISTORY OF PRODUCTIVITY AND SURVIVAL PATTERNS IN THIS AREA; THE BULL-TO-COW OBJECTIVE IS 25:100 FOR UNIT 13;]

(B) The moose harvest objectives for Units 13(A), 13(B), 13(C), **13(D)**, and 13(E) as established in 5 AAC 92.108 are 210–420, 310–620, 155–350, **75–190**, and 300 - 600 moose respectively; [WITH THE HARVEST OF BULLS AND COWS, THE CURRENT HARVEST OBJECTIVES CAN BE MET IN UNIT 13(A) AND ARE LIKELY ATTAINABLE IN UNITS 13(B) GIVEN THE HISTORY OF HARVEST PATTERNS IN THIS AREAS; THE HARVEST OBJECTIVES FOR UNIT 13(E) MAY NOT BE ATTAINABLE AND WILL BE RE-EVALUATED;]

(C) The department adopted 135–165 wolves as the late winter **minimum** abundance [OBJECTIVE] **for Unit 13**. Maintaining this **minimum** population size will allow for sustained yield of wolves and will ensure that wolves persist in the control area;

(3) Board findings concerning populations and human use are as follows:

(A) Moose harvest has been consistently below IM objectives in Units 13(B), 13(C), and 13(E);

(B) predation by wolves is an important cause of the failure to achieve population and harvest objectives;

(C) a reduction in wolf predation in Unit 13 can reasonably be expected to make progress toward achieving the Unit 13(A), 13(B), 13(C), **13(D)**, and 13(E) IM objectives for moose;

(D) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(F) reducing predation is likely to be effective given land ownership patterns, and

(F) reducing predation is in the best interest of subsistence users; Unit 13 has long been an important subsistence hunting area for local area residents and much of the state's population in Anchorage, the Matanuska-Susitna Valley, as well as Fairbanks and other communities around the state; it is recognized under the state's intensive management law as an area where moose are to be managed for high levels of human consumptive use.

(4) Authorized methods and means are as follows:

(A) hunting and trapping of wolves by the public in the Unit 13 Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may issue public aerial permits or public land and shoot permits as a method for wolf removal under AS 16.05.783;

(5) Time frame is as follows:

(A) through **July 1, 2031** [JULY 1, 2027], the commissioner may authorize the removal of wolves in the Unit 13 Predation Control Area;

(B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan;

(6) The commissioner will review, modify or suspend program activities as follows:

(A) when the mid-point of the IM population and harvest objectives for the moose population are achieved;

(B) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers below the management objective of 135 wolves specified in this subsection;

(C) if after 3 years, the harvest of wolves is not sufficient to make progress towards the intensive management population objectives for wolves;

(D) predation control activities may be suspended:

(i) if after 3 years, there is no detectable increase in the total number of moose in the control area;

(ii) if after three years, any measure **such as estimates of rump fat, short-yearling mass, and twining rates,** consistent with significant levels of nutritional stress in the moose population are identified;

(iii) when the moose population and harvest objectives within Unit 13 predation control area have been met.

**(c) Habitat Enhancement. The department may plan and execute habitat enhancement projects in areas identified for improvement based on evidence at the landscape or population level through prescribed burns, wildfire, or mechanical means to increase the potential carrying capacity across the range in Unit 13.**

**What is the issue you would like the board to address and why?** Unit 13D was excluded from the original Unit 13 Predation Control Area to provide a refugia for wolves and ensure that wolves remained to contribute to repopulation into adjacent subunits. Since the inception of the Unit 13 predation control program, moose abundance in all other subunits has rebounded except for Unit 13D which has a declining moose population that would benefit from wolf reduction before the population reaches a low-density-dynamic-equilibrium mediated by predation. As the Unit 13 Predation Control Area continues to be used as an effective adaptive management tool it may be necessary to keep some subunits closed to aerial wolf removal due to high moose abundance in those areas. This may require that more than 165 wolves remain in Unit 13 in some years. To provide for maximum effectiveness and adaptive application, the minimum of 135 wolves in the spring should remain in the plan, but a maximum number of wolves annually is no longer necessary. In addition, in areas where moose abundance has increased but antlerless hunts are not available to adjust population trajectory and bull:cow ratios or take advantage of increased harvest opportunities; aerial wolf removal should be suspended until such time as the moose population is reduced below the midpoint of the objective.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F21-042)  
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**PROPOSAL 220**

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

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

Close moose and wolf hunting within Unit 13A as follows:

My solution would be to close Unit 13A to ALL moose hunting and wolf hunting for five years and let nature take its course allowing the whole moose population to rebound. Perhaps only allow caribou hunting with check stations.

**What is the issue you would like the board to address and why?** Aerial wolf and moose hunting in Unit 13A. Gentleman/Ladies, understanding that there is a low bull cow ratio in Unit 13A, I do not believe that wolf hunting is the answer. Overhunting is the major problem! I have seen undersize bulls come out of there many times. Unit 13A is overrun with hunters. What is going to happen when the moose population tips over from a bad winter and the wolves are too low to blame? Hunters know that if they make it to the highway in the dark, they are home free as there are no check stations north or south. Also, I have considered the requirement of 50-inch with four brow tines, but I believe this would result in many animals left dead in the field. I've considered cow hunts, but you cannot take your breeding stock out of the field at this time. Thank you for your time.

**PROPOSED BY:** Bob Lopetrone (HQ-F21-018)  
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**PROPOSAL 221**

**5 AAC 84.270. Furbearer trapping.**

Align otter and beaver trapping seasons in Unit 13 as follows:

We would like the otter trapping season to directly align with the current beaver season. September 25th to May 31st.

**What is the issue you would like the board to address and why?** Otter trapping is tough to do when the waters are frozen in Unit 13. It is very difficult to catch them, except during beaver trapping season, which runs from September 25th to May 31st. We would like to see otter trapping season align with beaver trapping season. River otters are tough on the beaver population in this unit. Every year we have to turn in a few otters to the troopers that we accidentally trap during beaver season. We have never understood why these to water animals trapping season doesn't coincide with each other, as the pelts are excellent on both beaver and otter during the entire beaver season trapping period.

**PROPOSED BY:** Claude Bondy (EG-F21-004)  
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**PROPOSAL 222**

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

Align the ptarmigan hunting season for all of Unit 13 and reduce the bag limit to five per day as follows:

In order to provide a hunting opportunity for a period of time in Unit 13 where few exist, move all of Unit 13 to August 10 to March 31st, and have a bag limit of five per day.

**What is the issue you would like the board to address and why?** Ptarmigan hunting seasons, Unit 13: The changes in the ptarmigan seasons have led to decreased outdoor opportunities in the spring. It was reduced from March 31st to February 15th a couple of years ago. This change didn't make any sense, as ptarmigan numbers are good in Unit 13. As someone who spends over 300 days a year in the field across all parts of Unit 13, the reduction in hunting season doesn't make sense. The late February, all of March season was great opportunities for hunters of all ages to participate in the sport when almost all other hunting is shut down. If there is a proven and documented study that shows the numbers are down, then it would be better to address the issue with a reduction from ten per day to five per day.

**PROPOSED BY:** Claude Bondy (EG-F21-003)  
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