

# **King Salmon Area Proposals – Units 9 & 10**

## **PROPOSAL 25**

### **5 AAC 92.108. Identified big game prey populations and objectives.**

Review the intensive management findings for Unimak caribou and determine objectives if applicable:

### **5AAC 92.108 Identified big game prey populations and objectives.**

<b>Caribou Herds</b>	<b>Finding</b>	<b>Population Objective</b>	<b>Harvest Objective</b>
...			
Southern Alaska Peninsula Unimak Island	Positive	1,500–4,000	150–200
	<b><u>Negative</u></b>		
<b><u>Or</u></b>	<b><u>Positive</u></b>	<b><u>1,000–1,500</u></b>	<b><u>20–150</u></b>
....			

**What is the issue you would like the board to address and why?** Historically the Unimak Island caribou herd (UCH) was considered part of the Southern Alaska Peninsula caribou herd (SAP), therefore the population and harvest objectives from 5 AAC 92.108 above applied to the combined mainland and island herds. As biologists learned more about herd distribution, movement, disparate calving areas, and genetics, it became apparent that the two herds were separate. In the last decade movement between these herds, based on collared caribou monitored in both herds, has been almost nonexistent. The ADF&G Division of Wildlife Conservation maintains separate population and composition monitoring of the two herds, and therefore recommends distinguishing between the two herds in regulation. No survey and inventory management objectives are in place for the UCH; however, currently-recommended objectives under the Intensive Management (IM) Plan in 92.112 (expires May 2020), define a minimum population of 1,000 caribou, a ratio of 35 bulls:100 cows, and annual harvest of 100–150 in combination with the SAP.

Options to manage predator populations on Unimak Island are limited because most lands are designated federal wilderness. Unsuccessful negotiations with the U.S. Fish and Wildlife Service to allow wolf control on federal lands ended in court decision upholding federal restrictions on wilderness lands. The UCH population remains below the population and harvest objective set in the IM plan, numbering approximately 430–460 caribou; however, the herd began increasing recently at a rate of about 10% per year. Bull- and calf-to-100 cow ratios exceeded IM objectives in 92.112(c)(4)(D)(i-ii) as of fall 2018 (80 bulls and 44 calves per 100 cows) without predation control. Annual wolf harvest by hunters and trappers is 3.1 wolves, 62% of which are taken by nonresident bear hunters. Wolf harvest has been encouraged by waiving the nonresident tag fee (2010) and providing liberal seasons and bag limits (2009). The UCH has remained closed to caribou hunting since 2009 except for limited subsistence hunting of three bulls allowed recently on federal lands. Although calf mortality studies indicated that brown bears were important predators of neonates, an IM program for bears was not considered possible on Unimak. Habitat is not considered a limiting factor on the island.

False Pass, population 46, is the only community on Unimak Island. False Pass residents have reported limited hunting activity on the UCH and SAP in the last two decades. Reported cumulative UCH harvest from 1997 to 2008 was 117 (range of 0–19 annually), only 11 of which were by False Pass residents, an average of 0.9 killed per year for the community. The number of UCH hunters who reported from False Pass ranged from zero to eight, with an average of 1.4 hunters per year during that period. Although False Pass residents have boat access to the SAP, no hunting participation in state hunts was reported on the SAP during the recent six years that state hunts have been open and liberalized. Izembek National Wildlife Refuge staff issues federal subsistence permits to False Pass residents and reported that recent subsistence harvest on the SAP ranges from one to six per year. Reported caribou harvest by False Pass residents on the UCH and SAP, combined, does not meet the criteria in 92.106(1)(A)(i) caribou: 100; and level for hunter demand is low (92.106(1)(D)).

The SAP is recognized as an intensive management population. IM programs for the SAP were approved by the Board of Game (board) in 2008, successfully implemented, and allowed to expire in 2017. Intensive management population objectives established for the SAP (listed above) are still relevant and should remain unchanged. The SAP population size is approximately 2,700 and since 2012 has been increasing at an average of about 9.7% with a liberal season and bag limit to encourage hunter participation. Reported harvest remains low at 40–50 per year because of remoteness and difficult access but is increasing slowly as guides and hunters find their way in.

If the board’s finding is negative under 92.108 for the UCH, then the chapter addressing the Unimak Wolf Management Area in 92.112 should be repealed from regulation. If the UCH receives a positive finding, a revision to the IM plan in 92.112 will be necessary. The recommended management objectives and harvest strategy, derived from the 2010 UCH Operational Plan, are as follows:

Population Objectives

- Population size: 1,000–1,500
- Minimum bull-to-cow ratio: 35 bulls:100 cows
- Minimum cow-to-calf ratio: 20 calves:100 cows

Harvest Objectives

- Annual Harvest: 20–150

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-048)

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**PROPOSAL 26**

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

Determine customary and traditional uses of the Unimak Island caribou herd (Unit 10 – Unimak Island).

**What is the issue you would like the board to address and why?** Under AS 16.05.258, the Board of Game (board) is required to identify game populations, or portions of populations, that are customarily and traditionally taken or used for subsistence. Historically the Unimak caribou herd (UCH) was considered part of the Southern Alaska Peninsula caribou herd (SAP). Under 5 AAC 99.025, in 1987 the board determined a positive customary and traditional use (C&T) finding for caribou on Unimak Island as part of the Southern Alaska Peninsula herd (SAP) with an amount reasonably necessary for subsistence (ANS) of 100–150 caribou. The positive C&T finding was applied to the combined mainland and island herds. In the last decade there has been very little movement between these herds based on collared caribou monitored in both herds. The Department of Fish and Game (department) is proposing that the herds be managed separately (Proposal 25).

Because the caribou on Unimak island are now managed as a herd separate from the SAP, there is no C&T finding specific to the UCH. False Pass (population 49) is the only community on Unimak Island. The UCH population is at a low level (approximately 430 caribou), is increasing slowly, and has remained closed to hunting under state regulations since 2008. Three federal subsistence permits were issued during the last two years through special action requests to the Federal Subsistence Board. Reported cumulative UCH harvest from 1997 to 2008 was 117.

The department will prepare a report with information relevant to the eight criteria (5 AAC 99.010) that the board uses to identify game populations with C&T uses, to assist the Board with this finding.

If the board chooses to make a positive C&T finding for the Unimak caribou herd, we recommend that the board postpone establishing an ANS for the herd until the population reaches management goals and harvests consistent with traditional levels are sustainable.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-035)

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## **PROPOSAL 27**

### **5 AAC 92.111. Intensive Management Plans I.**

Reauthorize the Northern Alaska Peninsula (NAP) Caribou Herd Intensive Management Plan (IM) as follows:

(a) **Plans established.** Intensive management plans for the following areas are established in this section:

...

Northern Alaska Peninsula Herd Management Area is entirely deleted and replaced by the following:

**(b) Northern Alaska Peninsula Herd Predation Management Area: to facilitate growth in the Northern Alaska Peninsula (NAP) caribou herd on the mainland portions of Units 9(C) and 9(E) to aid in achieving intensive management objectives in an area encompassing approximately 19,461 square miles (50,403 square kilometers); the wolf reduction area includes all Alaska Peninsula drainages south of the south bank of the Naknek River and the southern boundary of Katmai National Park to a line from the southernmost head of Port Moller Bay to the head of American Bay, encompassing approximately 10,734 square miles (27,802 square kilometers);**

**(1) This is a continuing control program that was first authorized by the board in March 2010 for wolf control; it is currently designed to increase caribou abundance and harvest by reducing predation on caribou by wolves and is expected to make a contribution to achieving the intensive management (IM) objectives in Units 9(C) and 9(E).**

**(2) Caribou, brown bear and wolf objectives are as follows:**

**(A) the intensive management objective for the NAP as established in 5 AAC 92.108 is 6,000–15,000 caribou; these objectives were based on historic information regarding population numbers, habitat limitations, human use, and sustainable harvests;**

**(B) the caribou harvest objective for the NAP as established in 5 AAC 92.108 is 600–1,500 caribou;**

**(C) the wolf population objective for Unit 9 is to maintain a wolf population that can sustain a three-year annual harvest of 50 wolves;**

**(D) the brown bear population objective for Unit 9 is to maintain a high-density bear population with a sex and age structure that can sustain a harvest composed of 60 percent males, with 50 males eight years of age or older during combined fall and spring seasons;**

- (3) **Board findings concerning populations and human use are as follows:**
- (A) **The board has designated the NAP as important for providing high levels of human consumptive use;**
  - (B) **the board established objectives for population size and annual sustained harvest of caribou in Units 9(C) and 9(E) consistent with multiple use and principles of sound conservation and management of habitat and all wildlife species in the area;**
  - (C) **the population and harvest for the NAP are below IM objectives throughout the range;**
  - (D) **wolves are a major predator of caribou in the range of the NAP and are an important factor in failing to achieve these objectives;**
  - (E) **a reduction of predation can reasonably be expected to aid in achieving the objectives;**
  - (F) **nutrition is not considered to be the primary factor limiting caribou population growth;**
  - (G) **reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;**
  - (H) **reducing predation is likely to be effective given land ownership patterns, and;**
  - (I) **reducing predation is in the best interests of subsistence users.**
- (4) **Authorized methods and means are as follows:**
- (A) **hunting and trapping of wolves by the public in treatment areas during the term of the management program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles as provided in 5 AAC 92.080;**
  - (B) **the commissioner may issue public aerial shooting permits, public land and shoot permits, or ground-based shooting permits, allow agents of the state, or department employees to conduct aerial, land and shoot, or ground-based shooting as a method of wolf removal under AS 16.05.783, including the use of any type of aircraft;**
  - (C) **the commissioner may authorize the use of state employees or agents or state owned, privately owned, or chartered equipment, including helicopters, as a method of wolf removal under AS 16.05.783;**

- (5) Time frame is as follows:
- (A) through June 30, 2031, the commissioner may authorize the removal of wolves in the NAP Predation Management 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 caribou 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 IM population and harvest objectives for the NAP are sustained or the population can grow at a sustained rate of five percent annually;
  - (B) if after three years, the harvest of wolves is not sufficient to make progress towards the intensive management population objectives for wolves;
  - (C) if after three years, there is no detectable increase in the total number of caribou in the control area;
  - (D) if after three years, bull-to-cow ratios show no appreciable increase or remain below 20 bulls per 100 cows;
  - (E) if after three years, fall calf-to-cow ratios show no appreciable increase or can be sustained at 25 or more calves per 100 cows;
  - (F) if after three years, any measure consistent with significant levels of nutritional stress in the caribou population are identified;
  - (G) when the caribou population and harvest objectives within the NAP Predation Management Area have been met; or
  - (H) upon expiration of the period during which the commissioner is authorized to reduce wolf numbers in the wolf reduction areas.

**What is the issue you would like the board to address and why?** The Northern Alaska Peninsula Caribou Herd Intensive Management Plan expires on June 30, 2020. IM objectives for the NAP have not been achieved because wolf harvest was not sufficient to make progress towards the intensive management population objective for wolves (6B above). During the seven years that the IM program was active, a total of 16 (5%) wolves were removed via public control (same-day-airborne) versus 275 taken from the wolf assessment area by hunters and trappers. The most effective predation control action taken for the NAP was the waiving of the nonresident wolf tag requirement. As a result, most harvest is taken by guided nonresident bear hunters during the odd regulatory year when the bear seasons are open. Since 2011, the NAP has been increasing by an

average of about 7.3% per year and hovers near 4,300 caribou (based on survey data and modelling). At this rate the population should reach the lower end of objectives in five - six years.

To comply with protocol for intensive management plans, ADF&G is removing unnecessary and outdated information from the previous version and introducing specific regulatory language for the intensive management plan for the NAP predation management area. This reauthorization proposal allows the Board of Game to modify the programs objectives and give further guidance to ADF&G if warranted.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-046)

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**PROPOSAL 28**

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

Remove the resident bag limit of one brown bear every four years in Unit 9 as follows:

Remove the “one bear every four regulatory years” requirement for residents hunting under the RB368, RB369, and RB370 registration permits for brown bear in Unit 9.

**What is the issue you would like the board to address and why?** One bear every four regulatory years for resident hunters in Unit 9.

The RB368, RB369, and RB370 registration permit hunts in Unit 9, that occur in the spring of even-numbered years and fall of odd-numbered years allow unlimited resident and nonresident opportunity and nonresident guided hunters make up the majority of participants and take 80 percent of the harvest each season. Any conservation concerns are clearly related to the nonresident component where the vast majority of the harvest comes from.

There is absolutely no need for a restriction on resident hunters to only take one bear every four regulatory years. These registration permits are only available every other regulatory year as it is, so residents already are restricted to one bear every two regulatory years.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F20-018)

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**PROPOSAL 29**

**5 AAC 84.270 Furbearer trapping.**

**5 AAC 92.095(a)(3). Unlawful methods of taking furbearers; exceptions.**

Lengthen the season and liberalize methods and means for trapping beaver in Unit 9 as follows:

Liberalize the season and methods and means for trapping beaver in Unit 9 or in just subunits 9D and 9E, if the board thinks a unit-wide liberalization is too much.

In Unit 9, no closed season and no bag limit. A trapping license is still required.

In Unit 9 you may shoot up to the established bag limit with a firearm throughout the season provided that either the meat or hide is salvaged.

In Unit 9, from June 1 to October 9, taking of beaver by any means other than firearm is prohibited.

Beaver taken in Unit 9 only need to be sealed if they are to be sold as raw fur.

In Unit 9 you may shoot a beaver on the same day you have flown in an airplane if the beaver is either caught in a trap or snare, or you are more than 300 feet from the airplane.

In Unit 9 you may disturb or destroy a beaver dam. (Under current regulations, you may not disturb or destroy a beaver house or den.)

**What is the issue you would like the board to address and why?** The beaver population is ever expanding in Unit 9. They are damming up more small streams every year and preventing salmon from reaching their spawning grounds. Many of these small streams have lost their entire run of salmon. It was especially bad in the summer of 2019 when there was an extensive drought. I witnessed where beavers dammed two of the major spawning streams where I guide for brown bear. There was no salmon in them at all and no bears on the streams. These streams are normally 15 feet wide and two-or-more feet deep but with the reduced water flow because of the drought they were able to dam them. As of May 12, 2020, they are still dammed. The beaver population needs to be reduced. The liberalization of the beaver season, harvest methods, bag limits, salvage requirements and eliminating some of the sealing requirements will give everyone the maximum opportunity to harvest the surplus of beavers in this unit. Many of the residents and some nonresidents have expressed interest in being able to harvest a few beavers when they are hunting other species. Local residents will be able to harvest beaver anytime they want for food or fur. Most of Unit 9 is very remote with very little harvest of beavers at all.

**PROPOSED BY:** Dan Montgomery (EG-F20-046)  
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**PROPOSAL 30**

**5 AAC 84.270. Furbearer trapping.**

Shorten the wolf trapping season in Units 9 and 10 as follows:

Unit 9: August 10 – [JUNE 30] **April 30** No limit

Unit 10: November 10 – [JUNE 30] **April 30** No limit

**What is the issue you would like the board to address and why?** Need to shorten the wolf trapping season. Trapping after April 30 for wolf will let trappers harvest during the denning season. This brings unwanted attention from anti-hunting and trapping groups. Units 9 and 10 are the only units that extend into the denning season. This regulation allows for the taking of cubs during this time frame.

**PROPOSED BY:** Jeff Lucas (EG-F20-082)  
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**PROPOSAL 31**

**5 AAC 84.270. Furbearer trapping.**

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

Close wolverine trapping and hunting in Unit 10 as follows:

**5 AAC 84.270. Furbearer trapping.**

Units and Bag Limits	Open Season	Bag Limit
...		
(14) Wolverine		
...		
Units 6, 7, 9(A), 9(C), 9(D), [10,] 15, and 16(B)	Nov. 10 – Last day of Feb.	No limit
...		
<b><u>Unit 10</u></b>	<b><u>No open season</u></b>	
...		

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(14) Wolverine		
...		
Units 6–9 [10], 12, 15, 16(B), [10,] 15, and 16(B) 17 and 19–25, and 26(A) 1 wolverine	Sept. 1–Mar. 31	Sept. 1–Mar. 31
...		

**What is the issue you would like the board to address and why?** Wolverines only occur in Unit 10 on Unimak Island where they are very rare. There is one sealing record for a wolverine shot in 1980, and an observation by a wildlife biologist of a lone wolverine high in alpine snow in 2011. There are no records of harvests in subsistence household surveys (however, the only data point is a 1988 survey for False Pass). Wolf, fox, bears and their tracks are routinely seen on beaches where marine mammal carcasses have washed up, but no wolverine sign has been observed at these important food sources in the last 6 years of regular trips to the island. Wolverine may have crossed Isanotski Strait regularly on pack ice in decades past; sea ice at Unimak was much more common early in the twentieth century than it is now. While there is a positive customary and traditional use finding for wolverines in all units with a harvestable portion, and an amount necessary for subsistence of 90% of the harvestable portion, the Department of Fish and Game does not consider Unit 10 to have a harvestable portion. Trapping and hunting pressure on Unimak is currently low to nonexistent, which, combined with a lack of data regarding wolverine presence justifies closing of the hunting and trapping seasons.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-071)

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**PROPOSAL 32**

**5 AAC 85.065(4). Hunting seasons and bag limits for small game.**

Close the nonresident season for Emperor geese in Units 9 and 10 as follows:

The Alaska Migratory Bird Co-Management Council (AMBCC) will be conducting intensive outreach and education activities prior to the spring-summer season in an effort to reduce the harvest numbers of Emperor geese.

We are requesting that the state close the nonresident season in Units 9 and 10 until the population index is above 28,000 birds.

**What is the issue you would like the board to address and why?** In accordance with the AMBCC’s Emperor Goose Management Plan, once the population index is below 28,000 birds, the AMBCC will consider implementing conservation measures for the 2020 spring-summer subsistence harvest season. The State of Alaska will do the same for the 2020 fall-winter season and have reduced the number of birds allowed to be taken from 1000 to 500. Currently, the State of Alaska allocates 25 of the 500 birds to nonresident hunters as a draw permit.

**PROPOSED BY:** Alaska Migratory Bird Co-Management Council (EG-F20-118)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 33**

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

Allocate 50% of the permits for harvesting Emperor geese in Units 9, 10, and 17 to nonresidents as follows:

We propose that 50% of all allotted Emperor goose permits go to nonresident hunters. This would be 500 nonresident permits when Emperor goose counts are high enough for regular seasons. If counts dipped to restrictive seasons, then the nonresident quota would drop to 250 permits. This should result in no Alaska residents being left out, since Alaska residents have shown decreased interest in this hunt and their total harvest in 2019 was 122 Emperors statewide.

We propose continuing the current drawing process for nonresidents as it generates income for ADF&G. The current process allows for a nonresident with an Alaska hunting license to apply up to six times (\$5 per try up to \$30) to be drawn for a nonresident Emperor permit. We believe that by having individuals spend \$60 on a nonresident small game license and an additional \$30 on the drawing it will keep individuals out of the drawing that really have no interest or financial capacity to travel to Alaska.

Proposed breakdown of available permits:

Regular season:

AK Residents: 500 permits // nonresidents: 500 permits

Restrictive season:

AK Residents: 250 permits // nonresidents: 250 permits

**NOTE:** Alaska resident sport harvest was less than 129 birds each year from 2017-2019 with lower harvest reported each consecutive year.

**What is the issue you would like the board to address and why?** The recovery of the Emperor goose is a success story in modern wildlife management. The Alaska population of this goose crashed in the mid-1980's, prompting a hunting closure that lasted thirty years. The three-year estimated population average from 2014 to 2016 rose above the population threshold set in 2016 by the US Fish and Wildlife Service (USFWS) to reestablish a hunting season for Emperor Geese in Alaska. USFWS oversees migratory bird management and develops frameworks for states to set harvest regulations to establish hunting seasons, rules, and limits. Given the potentially fragile nature of the population's recovery, USFWS rightfully set a conservative 1,000 bird quota for a sport hunting season starting in fall 2017, on a trial basis, to be reevaluated after three years.

The State of Alaska Department of Fish and Game (ADF&G) and the Alaska Board of Game established a resident sport hunting season for fall/winter 2017 with seven zones, each zone having its own quota. The total of these zones equaled the 1,000 bird quota under regular USFWS harvest quotas based off of the population index. The total quota would be reduced to 500 if the previous

year's population index fell within the moderate harvest prescription. A game management unit (GMU) will close after shooting hours on the last day of the season, or by Emergency Order when the GMU quota is met. The Emperor Goose hunt was set up as a registration hunt and the limit has been one bird per person per season for the entire state. Also established in 2017 was an application for nonresidents to apply for a drawing to hunt Emperors during the fall/winter 2018 season. In 2017, all of the 1,000 bird quota was allotted to Alaska residents; for fall/winter 2018 and 2019 seasons, the number allotted to non-residents was 25 of the total 1,000 quota.

Statewide, harvest for fall and winter sport-hunted Emperor geese was 129 for 2017 (Alaska residents only), 150 for 2018, and 147 for 2019. For 2018 and 2019, those numbers are a sum of the resident and nonresident sport harvested Emperor geese. Sport hunters have only harvested 12.9% to 15% of the allocated quota over the three years of sport hunting. Harvest has declined steadily over these first three years as interest from Alaska residents appears to be on the decline. Alaska resident harvest was: 129 (2017), 125 (2018), 122 (2019).

There is no evidence to support any expectation resident sport harvest of Emperor geese will increase. Alaska has only 6,500 licensed waterfowl hunters in the entire state. Current estimates put the number of active waterfowl hunters in the lower 48 states at about 1.2 million.

The number of annual Emperor permits available to Alaskan resident waterfowl hunters (975) vs nonresidents (25) is drastically different from actual demand and interest in hunting Emperor geese. Roughly 400 nonresidents applied in November 2019 for the 25 nonresident permits for the 2020 fall/winter Emperor hunt. We believe the number of interested non-resident hunters is much higher, but many do not apply due to the poor odds of being drawn. Because Emperor goose hunting was closed for thirty years, most active nonresident hunters have never had the opportunity

to hunt them. If the current regulations stay in effect, most non-resident hunters will never get an opportunity to hunt this migratory species.

We understand that the ADF&G were rightfully cautious when restarting the Emperor goose hunt for a three-year trial. We have learned that most Alaskan hunters are simply not that interested in hunting Emperors and that the demand for this species is largely from non-resident hunters. These nonresidents would be extremely grateful to harvest just one Emperor goose in their life and would spend a large sum to accomplish this. Emperors' habitat borders rural communities that could put vital tourism dollars to good use to support their local economies. Larger municipalities' airports, hotels, restaurants, taxis, retail stores, and more would also see increased business from September through January as non-residents would spend time in Anchorage and elsewhere before and after their hunts in rural communities.

**PROPOSED BY:** Chad Yamane, EG-F20-068; Clint Pollard, EG-F20-115; Rob Price, EG-F20-095; Robert Haney, EG-F20-099; Bill Sager, EG-F20-127; Gary English, EG-F20-146; Steve Timler, EG-F20-103; Mark Ihrie; Tony Roberts; Patrick Bradburn; Colby Sarvis; Patricio Gaudiano

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We propose continuing the current drawing process for nonresidents as it generates income for the Alaska Department of Fish and Game. The current process allows for a nonresident with an Alaska hunting license to apply up to six times (\$5 per try up to \$30) to be drawn for a nonresident Emperor permit. We believe that by having individuals spend \$60 on a nonresident small game license and an additional \$30 on the drawing it will keep individuals out of the drawing that really have no interest or financial capacity to travel to Alaska.

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The number of annual Emperor permits available to Alaskan resident waterfowl hunters (975) versus nonresidents (25) is drastically different from actual demand and interest in hunting Emperor geese. Roughly 400 nonresidents applied in November 2019 for the 25 nonresident permits for the 2020 fall/winter Emperor hunt. We believe the number of interested nonresident hunters is much higher, but many do not apply due to the poor odds of being drawn. Because Emperor goose hunting was closed for thirty years, most active non-resident hunters have never had the opportunity to hunt them. If the current regulations stay in effect, most nonresident hunters will never get an opportunity to hunt this migratory species.

We understand that the ADF&G were rightfully cautious when restarting the Emperor goose hunt for a three-year trial. We have learned that most Alaskan hunters are simply not that interested in hunting Emperors and that the demand for this species is largely from nonresident hunters. These nonresidents would be extremely grateful to harvest just one Emperor goose in their life and would spend a large sum to accomplish this. Emperors' habitat borders rural communities that could put vital tourism dollars to good use to support their local economies. Larger municipalities' airports, hotels, restaurants, taxis, retail stores, and more would also see increased business from September through January as nonresidents would spend time in Anchorage and elsewhere before and after their hunts in rural communities.

Discussion: The State of Alaska closed Emperor goose hunting in 1986 in response to a drastic drop in population. Emperor goose population surveys from 1964-1986 were intermittent, with some years skipped completely. The Emperor goose remained off limits to US hunters for roughly thirty years as the population slowly increased. Surveys for Emperor geese have been conducted by USFWS in different areas of Alaska to estimate the overall Emperor goose population. These different surveys have included fall and spring surveys along portions of the Aleutian Islands, Alaska Peninsula, and Bristol Bay region. Other surveys have been focused on the main nesting areas of the Emperors on the Yukon-Kuskokwim Delta (Y-K Delta) area of Southwest Alaska. Current management has focused on using a total bird index from the Y-K Delta Coastal Zone Survey to assess population status relative to setting regulations for Emperor goose harvest. The harvest strategy defines a regulatory harvest closure threshold of 23,000 birds. This represents approximately 120,000 Emperor geese based on a theta-logistic population model currently in development (USFWS, R7-Migratory Bird Management). A recent three-year average population index (2014–2016) is 30,965 birds; equivalent to approximately 161,000 emperor geese.

With the overall population estimate at 161,000 for the three-year average of 2014-2016 USFWS and ADF&G started management action for the creation of a hunting season for Emperor geese.

The most similar population of geese in Alaska to Emperors for the sake of management is the Pacific Black Brant. 2019 fall counts conducted on the Izembek Lagoon near Cold Bay, Alaska produced an estimate of 157,000 Brant. Both species nest in Alaska and rely on marine environments exclusively for their annual life cycle. All other species of geese that nest in Alaska utilize agricultural waste grain in their wintering grounds and most utilize waste grain at some point on staging areas for their spring and fall migrations. Pacific Black Brant, for these reasons and more, are the most similar goose population for comparison to the Emperor goose population for management purposes.

In 2019, the season dates for Brant in Alaska were September 1 through December 16 in the Southcentral GMUs where most Brant hunting occurs. The daily limit is three Brant and possession limit is nine for both residents and nonresidents. There are no seasonal limits for any geese species in Alaska (or anywhere else in North America) except Emperors. In comparison, the season dates are the same for Emperor geese, but the Emperor goose limit is one per season for both residents and non-residents. However, nonresidents must apply for a permit the previous year and face long odds in drawing one of the 25 available permits for the entire state. Current regulations for an arguably similar species with similar populations (Pacific Black Brant) are drastically different.

For example, a nonresident can travel to Alaska to hunt Brant for a week and legally shoot a possession limit of nine Brant and there are no restrictions on the number of individual non-

residents allowed to hunt Brant. By comparison, only 25 individual nonresident hunters are permitted to harvest an Emperor for the entire season for the entire state of Alaska. These 25 hunters can only shoot one Emperor goose each per season for the entire state. Again, USFWS has estimated the Emperor goose population to be about 150,000 geese and authorized a fall/winter sport harvest of 1,000 geese. This very conservative number of 1,000 is less than 1% of the overall USFWS-estimated Emperor goose population.

Both residents and nonresidents were unable to hunt Emperors for 30+ years and the state of Alaska rightfully gave much more of the 1,000 available permits to residents. It was impossible for anyone to know exactly how much interest Alaska residents would have in this hunt. After the three-year initial trial, we now know that Alaska residents have shown far less interest in the hunting of Emperor geese. Fall/winter resident sport harvest of Emperors dropped each year from an initial harvest of 129 in 2017 and had fallen to 122 by 2019. In comparison, the number of non-residents applying for Emperor goose permits has gone up each year. It is important to remember that nonresident interest in hunting Emperor geese is much higher than application numbers suggest, as many nonresidents do not apply given their very low probability of being drawn.

In addition, prior to the Emperor goose closure in 1986, daily bag limits were six per day with no restrictions for nonresidents. The daily bag limit did drop to two per day for the two years prior to the closure. There is no history of permits, nor discrimination upon nonresidents. In addition, there are no other waterfowl restrictions with discrimination to nonresidents in any other U.S. state. When there are permits, for example tundra swan hunts, none of the nine participating states discriminate for nonresidents. All tundra swan hunt states have a permit system. Most have a drawing as there are more applicants than available permits. But some states, like Nevada, sell them over the counter as it has been difficult to hand out their full allotment of available permits. This case in Nevada seems the most like the Emperor situation in Alaska in that in the past three years, no more than 15% of the quota has been killed. This suggests that permit allocation could be increase by 570% to attain the USFWS authorized kill. We find this discrepancy to be exceptionally large; it should be addressed now after this three-year period has ended. Basically, given the past three-year history of resident and non-resident permit applications, all applications (including non-residents) could be awarded.

As the outlook for Alaska's economy remains uncertain due to a variety of reasons, we as a state must look for ways to support our local economies with responsible uses of the resources available to us. Tourism is an increasingly important part of the overall Alaskan economy for both rural and urban areas – this is made obvious in a 2014 study by the ADF&G Division of Wildlife Conservation. Two years of research led to the publication of *The Economic Importance of Alaska's Wildlife in 2011*, which indicates that spending on hunting and wildlife viewing totaled \$3.4 billion in 2011 and generated \$4.1 billion in economic activity in Alaska. The importance of wildlife to Alaska's economy has grown steadily in the last six years since the results were published. If Alaska increased non-resident permits to a total of 500, it could easily see another 1,000 visitors, since most hunters want to experience this opportunity of a lifetime with friends and family. If the average visiting hunter spends \$5,000 per person on their trip, this reallocation of total Emperor permits could conservatively result in an additional \$5 million supporting Alaska's economy every fall. Some would certainly spend much more, but others could go on budget-friendly do it yourself trips. This money would help struggling airlines, restaurants, retail stores, hotels, small businesses, guides, and small rural communities where hunters would have to travel to hunt these geese.

Conclusion: We believe that it is time to change the regulations to allow far more nonresidents to participate in the Emperor goose hunt. We applaud the ADF&G for initially being cautious with this precious resource. We also understand that Alaska residents should be given priority if there is a conflict over hunting opportunities. Furthermore, we understand that the three-year trial is up, and we need to reevaluate how we allocate Emperor goose permits. Clearly, Alaska residents have not shown the anticipated interest in hunting Emperor geese and there is a huge demand for Emperor goose permits by non-residents. Science indicates that an additional harvest of 500 more Emperor geese should have no effect on a population of 150,000. The money generated by allowing more nonresident Emperor goose hunters will be substantial revenue for many Alaskan small businesses and rural communities. With the recent drop in oil prices and complications from the COVID-19 pandemic, Alaska must act now to provide more sustainable options for economic growth.

**PROPOSED BY:** Jeff Bringham, Andrew Williams, Matt Cates, Lucas Davis, Glenn Issette, Nathan Talbot, Erik Kauffman, Jeffrey Johnson, Joe Cook, Delbert Gatlin III, Benjamin Hillis, Gary Kramer, Robert Wasley, Jeffrey Wasley, City of Cold Bay, Angela Simpson, Patrick Bradburn, Daniel Talbot, Demetri Kritzas, Patrick Pitt, Ryan Breish, James Crews, III; Hugh Clark; Alaska Waterfowl Association; Domanic Heim; Andrew Gibson; Jake Greseth; Sherwood Breish; Scott Mohr; Jordan Hamann;

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 35**

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

Allocate 50% of the permits for harvesting Emperor geese in Units 9, 10, and 17 to nonresidents as follows:

Increase the proportion of annual Emperor goose permits allotted to nonresidents to 50% of overall permits. When Emperor goose population counts merit regular seasons, this would equate to 500 nonresident permits; if population counts dip to merit restrictive seasons, the nonresident quota would drop to 250 permits.

Because the peak sport harvest by Alaska residents topped out at 129 birds back in 2017, this should result in no Alaska resident being restricted from sport harvest of an Emperor.

Proposed breakdown of available permits:

Regular season:

AK Residents: 500 permits // nonresidents: 500 permits

Restrictive season:

AK Residents: 250 permits // nonresidents: 250 permits

**NOTE:** Alaska resident sport harvest was less than 129 birds each year from 2017-2019 with lower harvest reported each consecutive year.

**What is the issue you would like the board to address and why?** Increasing the allocation of Emperor goose permits for non-residents

I appreciate USFWS, ADF&G, and the Board of Game's cautious approach to the opening of Emperor goose sport harvest in 2017. As a longtime waterfowler from Montana, I have applied every year in hopes of being drawn for an Emperor permit, even though I knew the odds were long. It would be the honor of my lifetime to be able to harvest an Emperor, a conservation success story, on public lands of which I am a steward.

The evidence is clear that interest by Alaska residents for sport harvest of this species is limited and decreasing. Increasing the number of permits available to non-residents would immediately benefit ADF&G's budget and Alaska's economy.

I respectfully ask you to consider providing nonresidents with a better chance to be drawn for an Emperor goose permit.

**PROPOSED BY:** Brianne Rogers (EG-F20-152)  
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*Note: Proposal 36 is a combination of Two individual submissions both requesting a 50/50 split for the number of permits for residents and nonresidents to take Emperor geese. Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 36**

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

Allocate a 50/50 split for resident and nonresident Emperor goose permits for Units 9, 10, and 17 as follows:

Data supports that since inception that residents use less than 130 of the 1000 tags. Also that number has been decreasing slightly every year however the nonresident interest is at peak interest with a little less than 500. I would propose a 50/50 split on the tags so that everyone can have an opportunity to hunt the Emperors. I have unsuccessfully put in every year available and no "luck". With a meager 25 allotted to nonresidents it makes the odds near impossible. An increase in tags would bring more money into Alaska as sporting tourism brings in dollars

**What is the issue you would like the board to address and why?** Nonresident Emperor goose permits.

**PROPOSED BY:** Sean Tomlin (EG-F20-156)  
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I believe the new regulation should have a higher proportion of Emperor goose tags for residents of the lower 48 states. A 50/50 split seems reasonable.

**What is the issue you would like the board to address and why?** I believe that the allocation of Emperor goose tags should increase for residents of the lower 48 states. The current number of Emperor tags is being underutilized by Alaska residents.

**PROPOSED BY:** Robert Kelsey (EG-F20-170)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 37**

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

Allocate 500 permits to nonresidents for taking Emperor geese for Units 9, 10, and 17 as follows:

Increase the amount of nonresident tags for Emperor geese to 500.

**What is the issue you would like the board to address and why?** Emperor goose hunting for nonresidents. I would gladly pay thousands of dollars as would many of my friends to have the opportunity to travel to Alaska and hunt Emperor geese. As far as I can tell the 1,000 goose quota for Emperor geese has never even come close to being filled. As it stands only 25 tags are allocated to nonresidents. I would propose increasing that to at least 500 because they clearly are not being used by resident hunters. Thank you for considering this proposal.

**PROPOSED BY:** Stephen Wilber (EG-F20-071)

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*Note: Proposal 38 is a combination of two proposal submissions requesting 500 permits for residents and nonresidents for taking Emperor geese. Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 38**

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

Allocate 500 permits to residents and nonresidents for taking Emperor geese for Units 9, 10, and 17 as follows:

I would recommend setting aside fewer Emperor goose tags for Alaska residents only and allow more nonresident tags. I would recommend setting the draws at 500 tags for Alaska residents only and 500 tags for nonresidents and any Alaska residents that applied for a tag and were not drawn in the resident application. This would allow other US citizens to enjoy this National resource as well.

**What is the issue you would like the board to address and why?** Lack of opportunity for nonresident hunters to harvest Emperor geese. Alaska residents have had more than ample opportunity to harvest Emperor geese for several years. Nonresidents have only had the opportunity for 75 tags for the rest of the population. Between buying a license and applying for tags each year I have spent around \$300 with very low odds of a draw and have never been drawn. My understanding is that resident Alaskans have never harvested more than 130 Emperor geese in a given season.

**PROPOSED BY:** Britt Broadhurst (EG-F20-081)

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**Proposed solution:** Based on the extremely low interest and harvest by the resident pool, I would ask or recommend to make the allocation an even split, 500 permits to both groups. If you add a full successful nonresident pool to the average resident harvest, you are still well below the harvest allocation of 1,000 birds. Of course, if science data feels the overall harvest needs to be decreased, then it should to preserve the species, but again keep it even and reduce the allocation to both groups evenly.

**What is the issue you would like the board to address and why?** The drastically different allocation of Emperor goose hunting permits between residents and nonresidents. It seems well documented with data that the resident interest in the hunting opportunity is very low and therefore it would make sense to allow more nonresidents more of an opportunity and better odds to have the experience. By allowing more avid nonresident waterfowl hunters to visit Alaska for the once in a lifetime hunting experience would benefit the tourism income for the state and its residents just as all of the nonresident big game hunters and fisherman provide.

**PROPOSED BY:** Christopher Eikelberger (EG-F20-116)

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*Note: Proposal 39 is a combination of two proposal submissions both requesting an equal number of permits for residents and nonresidents to take Emperor geese. Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 39**

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

Allocate an equal number of permits for residents and nonresidents for taking Emperor geese for Units 9, 10, and 17 as follows:

I recommend offering an equal amount of tags to nonresidents as are available to residents.

**What is the issue you would like the board to address and why?** As a nonresident I would like to see more Emperor goose tags allotted to nonresident hunters.

**PROPOSED BY:** Josh Sowada (EG-F20-107)

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Have the goose limits be the same for residents and nonresidents.

**What is the issue you would like the board to address and why?** I propose allowing nonresident waterfowl hunters harvest the same limit of geese for all species. Do not reduce nonresident limits. I spend time in Alaska fishing every other year and I one day plane to come hunt waterfowl in Alaska. My nonresident fishing licenses and future hunting licenses should allow me the same opportunities to hunt as fish as residents.

**PROPOSED BY:** Brett McCausland (EG-F20-090)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 40**

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

Double the number of nonresident permits for taking Emperor geese for Units 9, 10, and 17 as follows:

Double the amount of nonresident tags issued and keep the same total overall quota

**What is the issue you would like the board to address and why?** I would like to see more nonresident permits issued for the Emperor goose hunt. The total quota annually is not being met by resident hunters. It would be nice to be able to have a better chance than one in 25 for nonresidents. There are many of us that would love the opportunity to come and hunt in Alaska and spend our money on your economy.

**PROPOSED BY:** Sherwin Lott (EG-F20-065)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting. Proposal 41 is a combination of twelve individual submissions requesting an increase in nonresident permits for taking Emperor geese.*

**PROPOSAL 41**

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

Increase the number of nonresident permits for taking Emperor geese for Units 9, 10, and 17 as follows:

I would like to see a higher number of permits for nonresident hunters. This would generate a large amount of revenue for rural Alaskan communities without causing significant damage to the population of Emperor geese.

**What is the issue you would like the board to address and why?** The disproportionate amount of nonresident Emperor goose permits for residents compared to nonresidents. There are 975 permits are available for residents of the State of Alaska, while just 25 permits are available for nonresidents on a limited draw basis. The majority of the resident permits aren't even utilized. Many nonresident hunters don't even apply for the draw because of the poor odds.

**PROPOSED BY:** Christopher O'Brien (EG-F20-070)

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My solution would be to increase tag numbers.

**What is the issue you would like the board to address and why?** Increased number of Emperor goose tags available for nonresident hunters. By increasing tags you allow more opportunities for revenue to Alaska. Waterfowl hunters spend a great deal of time and revenue traveling to different destinations to pursue different species. The emperor goose is on the bucket list for many hunters but with extremely low amount of tags being drawn is extremely unlikely.

**PROPOSED BY:** Matt Switlick (EG-F20-076)  
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Increase the number of Emperor goose permits for nonresidents. The small amount of permits for nonresidents will have no impact on the population.

**What is the issue you would like the board to address and why?** Emperor goose permits

**PROPOSED BY:** Breck Dickinson (EG-F20-078)  
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I think that more nonresident tags should be offered.

**What is the issue you would like the board to address and why?** The Emperor goose season.

**PROPOSED BY:** Lucien Gwin (EG-F20-083)  
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Increase availability to hunt Emperor geese for nonresidents.

**What is the issue you would like the board to address and why?** Increase hunting permits.

**PROPOSED BY:** Kevin Ryan (EG-F20-088)  
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More tags for nonresidents due to increase demand and populations of the Emperor geese available for harvest. There is no evidence to prove overharvest in hunting or subsistence at this point in time.

**What is the issue you would like the board to address and why?** More nonresident tags for Emperor geese.

**PROPOSED BY:** Mark Goldsworthy (EG-F20-091)  
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I don't know the data or have a solution based on science but from I've seen it looks like it could open up at least a little but for nonresidents.

**What is the issue you would like the board to address and why?** My name is Lee Thomas Kjos, longtime outdoor photographer, fisherman and hunter. My passion has always been

waterfowl conservation and hunting. I've made many trips to Alaska in my lifetime and on a number of those been fortunate enough to see and photograph Emperor geese. Guide friends and outfitters have offered to me many times that if there ever was a chance for me to hunt Emperors to come up. I'm sixty years old now and would sure love the opportunity. I did apply for the Adak Island area this year unsuccessfully. I was really looking forward to it. Thank you.

**PROPOSED BY:** Lee Thomas Kjos (EG-F20-102)

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Due to Emperor goose harvest numbers annually falling short of the maximum allotted harvest, and goose numbers holding strong or increasing since the opening of Alaska's Emperor goose season, I suggest increasing the number of Emperor goose permits available to nonresidents. This could result in millions of dollars coming into Alaska's economy and create more hunting opportunities for these highly sought-after waterfowl.

**What is the issue you would like the board to address and why?** Nonresident Emperor goose permit allocation.

**PROPOSED BY:** Scott Haugen (EG-F20-136)

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*Note: The Board of Game does not have authority to change permit fees.*

I would propose an allocated number of nonresident tags for purchase, at a reasonable dollar figure so as not to deter a potential hunter. After all, the travel to Alaska for most can be costly, especially within the islands.

**What is the issue you would like the board to address and why?** Increase the amount of nonresident Emperor goose permits. Based on the available data, it appears there is not a huge demand from Alaska residents for harvesting Emperor geese, at least not enough to constitute the previously available resident tags. There is a niche group of waterfowl collectors worldwide that would clamor at the chance to harvest just one of these birds in their lifetime, as I am one of them. I have witnessed residents harvest these birds, and there is little to no satisfaction evident other than a seemingly additional check mark on a list.

**PROPOSED BY:** Jason Pinter (EG-F20-143)

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I would recommend allocating more nonresident tags. Allowing more nonresident tags would give hunters more of a chance in drawing a tag. I also feel that it would help improve the drawing of tags from multiple people in the same hunting party. On multiple occasions my father, myself, and other family members and friends have not been drawn and one person in our group would be drawn. This causes trip cancellations etc. because the majority of tag seekers do not get drawn. If there were more tags available the odds of having more people in a group get drawn would increase.

**What is the issue you would like the board to address and why?** I would like to address the current Emperor goose regulations for nonresident hunters. I have had the great opportunity to

hunt waterfowl in the State of Alaska multiple times. My father and I have had opportunities to hunt in Adak, Seldovia, Kodiak, Cold Bay, and St. Paul Island. These travels and hunting experiences have been of those that I will forever remember. We have applied multiple times to hunt Emperor geese and have found it too difficult to obtain a tag. I feel that only allowing 25 nonresident tags for this species is too limited. The population of geese is a great level currently. I feel that with the limited interest in harvesting Emperor geese shown by residents of Alaska, there should be an increase in tags allocated to nonresidents. This would not only bring more revenue to the State of Alaska as a whole, but also help the local economies and businesses such as guide services.

**PROPOSED BY:** Delbert. Gatlin IV (EG-F20-149)

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Allow a larger percentage of the tags to be available for nonresident hunters.

**What is the issue you would like the board to address and why?** As a nonresident waterfowl hunter it would be nice to have the opportunity to hunt an Emperor goose and as of now you only allow 25 permits to nonresidents when there are 1,000 available and the balance are given to residents of Alaska and then the last three years they never use more than 130 of them so it would be nice if the nonresidents could have a chance at one of these special trophies once in their lifetime

**PROPOSED BY:** Steven Sadowski (EG-F20-163)

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Please allocate a larger percentage of the quota for emperor goose tags to mon resident hunters.

**What is the issue you would like the board to address and why?** I would like a greater portion of the emperor goose tags allotted to nonresident hunters. It seems like there is limited interest from resident hunters, increasing the quota for nonresidents allows more interest and opportunity and the fees, travel costs, etc. Contribute money to the local economy which can be used to aid in conservation of the geese and other species.

**PROPOSED BY:** Matt Frackelton (EG-F20-084)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting. In addition, the Board of Game does not have authority over the enforcement of regulations.*

**PROPOSAL 42**

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

Allow more years of nonresident Emperor goose tags to be allotted for a lottery for Units 9, 10, and 17 as follows:

Allow more years of Emperor harvest for nonresidents and residents and increase enforcement during subsistence hunting season so that over-harvest is reduced.

**What is the issue you would like the board to address and why?** Please allow more years of nonresident Emperor goose tags to be allotted for lottery.

**PROPOSED BY:** Moe Neale

(EG-F20-085)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting. In addition, the Board of Game does not have authority to increase permit application fees.*

**PROPOSAL 43**

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

Increase the number nonresident permits for harvesting Emperor geese to 10% for Units 9, 10, and 17 as follows:

Given the current population objective and harvest rates, I recommend the Board of Game increase nonresident permit numbers in concurrence with an increase in fees associated with permit applications. Increase the allocation to ten % for nonresidents and increase the permit application fee \$5.00 per application with those funds to be applied to long-term monitoring, marking, and reporting of waterfowl programs in the State of Alaska.

**What is the issue you would like the board to address and why?** I recommend the Board of Game (board) increase nonresident Emperor goose permit allocations: Having followed the three-year experimental season for resident and nonresident Emperor goose hunt in Alaska beginning in 2017, it appears that the regulated harvest system has worked. There is strong evidence for continued sustainable harvest and opportunities for nonresident hunters. Additionally, reported harvest indicates a saturation of resident hunters willing to undertake the expense and time commitment to harvest Emperor geese. The board can and should allocate ten % (100) of the permit quota (1,000) to nonresident hunters. This would likely lead to a small increase in harvest,

but still well within the long-term objectives of the Pacific Flyway, the US Fish and Wildlife Service, and the Alaska Department of Fish and Game.

**PROPOSED BY:** Matthew Wilson (EG-F20-130)  
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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 44**

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

Allow nonresidents to purchase un-issued Emperor geese permits for Units 9, 10, and 17 as follows:

I would like to see un-issued resident tags made available for over the counter purchase for nonresidents.

**What is the issue you would like the board to address and why?** The Emperor goose hunting opportunities for nonresidents. Given their resurgence, hunting opportunities have been re-established, but primarily for residents. In the first two seasons, many state tags have gone unused, while hundreds of nonresidents have applied and only 25 are issued each season. Would like to see the management of available tags be more favorable for nonresidents.

**PROPOSED BY:** Michael Bard (EG-F20-159)  
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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 45**

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

Increase permits and require use of an outfitter for nonresident harvest of Emperor geese for Units 9, 10, and 17 as follows:

Allow nonresidents to get Emperor goose tags, however nonresidents shall have to hunt through a reputable outfitter licensed in Alaska. So maybe allow a larger amount of goose tags to be available for nonresidents. It would be great for the Alaskan economy, as well as allow outfitter businesses to flourish, waterfowl hunters to pursue this trophy goose.

**What is the issue you would like the board to address and why?** I think it would be a very profitable venture for outfitters in Alaska and desirable to nonresidents to be able to hunt emperor

geese. There are many tags that are unused and not enough nonresident tags. I think it would be a privilege for nonresidents to hunt these geese.

**PROPOSED BY:** Gina Sadowski (EG-F20-166)  
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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 46**

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

Increase nonresident permits and establish preference points for harvesting Emperor geese for Units 9, 10, and 17 as follows:

Preference points and increase nonresident tags.

**What is the issue you would like the board to address and why?** You are not harvesting near the numbers that are allocated. You should be letting nonresident harvest more. Numbers show that there is no resident interest. Also, I have applied since the beginning and have no preference over someone who has just started. I've invested for three years to have an opportunity for a bird of a lifetime. Preference points are needed and so are more nonresident tags. If nothing else the state brings in more income.

**PROPOSED BY:** Thomas Losk (EG-F20-168)  
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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 47**

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

Increase the number of nonresidents permits for taking Emperor geese or set a hunt quota with 24-hour harvest reporting requirement for Units 9, 10, and 17 as follows:

Give a thousand Emperor goose tags out or you have it open as a quota hunt, mandatory 24-hour reporting of the bird to stay inside the 1,000-bird quota. These birds are in such remote areas that are expensive to get too. I guarantee there will be nowhere near the 1,000 birds harvested due to there geographic locations.

**What is the issue you would like the board to address and why?** If there is a 1,000 bird quota for residents and they have only harvested 125 birds they need to open up the amount of permits to nonresidents. As long as the 1,000 bird harvest is intact to sustain a healthy population. It should not matter if it is residents or nonresidents harvesting the birds. It would also create revenue for

Alaska to have more no residents to come up and hunt spending money to local communities. Creating a chance to take a trophy bird in a conservation program funding for further studies to learn more about Emperor geese.

**PROPOSED BY:** Luke Schmidt (EG-F20-172)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 48**

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

Increase the number nonresident permits for harvesting Emperor geese or offer a second drawing for Units 9, 10, and 17 as follows:

Increase the number of nonresident licenses for Emperor geese, or allow for a second lottery for remaining licenses.

**What is the issue you would like the board to address and why?** I am a nonresident who is interested in harvesting an Emperor goose at some time in the future. The current scientific study allows for the harvest of 1,000 Emperor geese annually, if which only 25 are allocated for nonresident hunters. The participation of resident hunters continues to leave licenses unused and available. These licenses could be used for nonresidents that would travel to Alaska and support not only local economies, but also wildlife through license purchases. Please take my comments into consideration.

**PROPOSED BY:** Terry Lassiter (EG-F20-072)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

**PROPOSAL 49**

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

Establish resident and nonresident quotas per region for taking Emperor geese with reporting requirements, or offer a second drawing for un-issued permits for Units 9, 10, and 17 as follows:

I would have a quota application/ draw for nonresidents and residents per region. Once the number of tags were drawn for that region, that would be all allowed for that area. Example: Kodiak Island is allowed 80 tags. One per person and each person pays a fee for that tag. The hunter must fill out a survey at seasons end stating whether they hunted or didn't hunt the birds. If they do not return the survey, they would not be eligible for the draw for two years. You could have regions based on area such as; Adak, Cold Bay/Izembek, Nelson Lagoon, Kodiak, etc. After the initial draw, if all tags weren't awarded, you could offer a second draw for leftover tags and they could be available to new applications and you could allow others who may have drawn an option for a second tag. Two max per season per person. The tag would need to be placed on the bird before

moving it from the hunting location for transportation. The same fees would apply that exist as of now.

**What is the issue you would like the board to address and why?** Emperor goose hunting. The need for nonresidents of the lower 48 to hunt on a limited basis.

**PROPOSED BY:** Shane Smith

(EG-F20-087)

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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

## **PROPOSAL 50**

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

Increase the number nonresident permits for harvesting Emperor geese or allow for a second lottery for Units 9, 10, and 17 as follows:

My suggestion is to consider a strict program that allows the 2021 program to include the list below. Nonresident allotment at 100% on valid AK license holders in a few areas throughout the Aleutian Islands including Cold Bay. The anticipated number would be less than 500 total harvests.

Resident allotment at 100% for first time harvesters, 75% for 2nd time harvesters and 50% on 3rd time harvesters.

1st timer up to two tags at 100%

2nd timer up to 1 tag at 100%

3rd timer up to 50% of them receiving 1 tag

500 harvests to nonresidents

500 harvests to 1st timers

200 harvests to 2nd timers

125 harvests to 3rd timers

1325 total harvests

Emperor goose population density 175,000

3/4 of 1% would be the impact on the population.

**What is the issue you would like the board to address and why?** As a waterfowl guide and enthusiast, I have sat back and watched the decline and rise of species. I have been watching and studying the emperor goose trends for over a decade. Knowing I would never have an opportunity to harvest one I continued to press onward. I have registered three times since the acceptance of the tag lottery draw and still been unsuccessful. The issuing of more tags per year to nonresidents will not even put a small statistical change of the overall population of these majestic winged species.

If you just sit back and calculate the number of nonresident hunters that would harvest an Emperor goose, well it is microscopic at best. The resident harvest allotment outside of “real” subsistence is microscopic as well. The math and statistical relevance of increasing the nonresident as well as the resident harvest rates combined is not enough to endanger the growth and prevalence of the Emperor goose. All that apply receive a tag. Thank you for your tune and consideration

**PROPOSED BY:** Christian Scudder

(EG-F20-089)

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**PROPOSAL 204**

**5 AAC 85.045(a)(8). Hunting seasons and bag limits for moose.**

Lengthen moose seasons in Units 9B and 9C and align hunt areas in Unit 9C as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(8)		
Unit 9(B)		
RESIDENT HUNTERS: 1 bull by registration permit only; or 1 antlered bull by registration permit only	<b><u>Sept. 1–Sept. 25</u></b> [SEPT. 1–SEPT. 20]  Dec. 15–Jan. 15	
NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by registra- tion permit only		Sept. 5–Sept. 15
Unit 9(C), [THAT PORTION DRAINING INTO THE NAKNEK RIVER]		
RESIDENT HUNTERS: 1 bull by registration permit only; or 1 antlered bull by registration permit only	<b><u>Sept. 1–Sept. 25</u></b> [SEPT. 1–SEPT. 20]  <b><u>Dec. 1–Jan. 15</u></b> [DEC. 1–DEC. 31]	
NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 3 or more brow tines on one side, by registra- tion permit only		Sept. 5–Sept. 20
[REMAINDER OF UNIT 9C]		

[RESIDENT HUNTERS:

1 BULL BY REGISTRATION PERMIT      SEPT 1–SEPT. 20  
ONLY; OR

1 ANTLERED BULL BY                      DEC. 15–JAN. 15  
REGISTRATION PERMIT  
ONLY

NONRESIDENT HUNTERS:

1 BULL WITH 50-INCH ANTLERS    SEPT. 5–SEPT. 20  
OR ANTLERS WITH 3 OR MORE  
BROW TINES ON ONE SIDE, BY  
REGISTRATION PERMIT ONLY]

...

**What is the issue you would like the board to address and why?** Moose populations in Units 9B and 9C are above management objectives regarding bull-to-cow ratios and could sustain additional bull harvest under registration moose permits RM272 (residents only). There are no moose population estimates for Unit 9, however, composition surveys indicate that the bull:cow ratio in Unit 9B was high in 2018 and was 67 bulls:100 cows in Unit 9C in 2020. This proposal would add five days to the fall season and 15 days to the winter season in Units 9B and 9C. On average (2011–2019), in Unit 9B there were 35 moose harvested annually during the fall season (86%) and 6 during winter (14%). In Unit 9C harvest averaged 21 moose in the fall (83%) and four during winter (17%). Winter seasons are often hampered by lack of snow. The Alaska Department of Fish and Game will monitor bull:cow ratios and recommend reverting to shorter seasons if necessary.

This proposal would also remove the split of Unit 9C into Naknek River drainages and the remainder portion for registration hunts RM272 and RM282 (nonresidents). The only difference currently is a two-week shift later in the winter season for the remainder portion for resident hunters. The proposed winter season dates for RM272 would span the entire range of current winter dates for both portions of Unit 9C.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-21-022)

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**PROPOSAL 205**

**5 AAC 92.112 Intensive Management Plan I.**

Reauthorize the Southern Alaska Peninsula Herd Intensive Management Plan as follows:

**5 AAC 92.112 Intensive Management Plan I.** (b) is entirely deleted and replaced by the following:

**(b) Southern Alaska Peninsula Predation Management Area. Notwithstanding any other provisions in this title, and based on the following information contained in this subsection, the commissioner or the commissioner’s designee may conduct a wolf**

**population reduction or wolf population regulation program on the Alaska Peninsula in Unit 9(D); the control area includes all drainages of the Alaska Peninsula west of a line from the southernmost head of Port Moller Bay to the head of American Bay, encompassing approximately 3,819 square miles;**

**(1) this is a continuing control program that was first established by the Board of Game (board) in 2008 for wolf control; it is designed to increase the Southern Alaska Peninsula Caribou Herd (SAPCH) on the mainland portion of Unit 9(D) to aid in achieving intensive management (IM) objectives;**

**(2) Caribou and wolf objectives are as follows:**

**(A) the IM population objective for the SAPCH as established in 5 AAC 92.108 is 1,500–4,000 caribou;**

**(B) the caribou harvest objective for the SAPCH as established in 5 AAC 92.108 is 150–200 caribou in combination with harvest from the Unimak caribou herd (UCH);**

**(C) the management objective for Unit 9 wolves is to maintain a wolf population that will sustain a 3-year average annual harvest of at least 50 wolves; and**

**(D) the brown bear population objective for Unit 9 is to maintain a high-density bear population with a sex and age structure that can sustain a harvest composed of 60 percent males, with 50 males eight years of age or older during combined fall and spring seasons.**

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

**(A) the board has designated the SAPCH as important for providing high levels of human consumptive use;**

**(B) the board established objectives for population size and annual sustained harvest of caribou in Units 9(D) consistent with multiple use and principles of sound conservation and management of habitat and all wildlife species in the area;**

**(C) the population and harvest is currently below IM objectives for the SAPCH, however harvest is below objectives because of low hunter participation;.**

**(D) wolves are a major predator of caribou in the range of the SAPCH and were an important factor in population and harvest levels falling below IM objectives during the mid 2000's;**

- (E) a reduction of predation was successful in achieving IM objectives in the late 2000's, setting a precedent for future actions;
  - (F) nutrition is not considered to be the primary factor limiting caribou population growth;
  - (G) future reduction in predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;
  - (H) future reduction in predation is likely to be effective given land ownership patterns; and
  - (I) future reduction in predation is in the best interests of subsistence users, and is recognized under the state's intensive management law as an area where caribou 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 treatment areas during the term of the management program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles as provided in 5 AAC 92.080;
  - (B) the commissioner may issue public aerial shooting permits, public land and shoot permits, or ground-based shooting permits, allow agents of the state, or department employees to conduct aerial, land and shoot, or ground-based shooting as a method of wolf removal under AS 16.05.783, including the use of any type of aircraft;
  - (C) the commissioner may authorize the use of state employees or agents or state owned, privately owned, or chartered equipment, including helicopters, as a method of wolf removal under AS 16.05.783; and
- (5) Time frame is as follows:
- (A) through June 30, 2031, the commissioner may authorize the removal of wolves in the SAPCH Predation Management Area to aid in population growth or improve harvest of SAPCH caribou; and
  - (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 caribou 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 or harvest objectives for the SAPCH are achieved;
- (B) if, after three years, the harvest of wolves is not sufficient to make progress towards the IM population objectives for wolves;
- (C) if, after three years, there is no detectable increase in the total number of caribou in the control area;
- (D) if, after three years, bull-to-cow ratios show no appreciable increase;
- (E) if, after three years, fall calf-to-cow ratios show no appreciable increase;
- (F) if, after three years, any measure consistent with significant levels of nutritional stress in the caribou population are identified; or
- (G) when the caribou population and harvest objectives within the SAPCH Predation Management Area have been met.

**What is the issue you would like the board to address and why?** The Southern Alaska Peninsula Caribou Herd (SAPCH) Intensive Management Plan was suspended during July 2010 and expired on June 30, 2017. IM population objectives for the SAPCH have been achieved since Regulatory Year (RY) 2012–13. Since RY08, the SAPCH has been increasing by an average of about 11% per year and was near 3,100 caribou (based on survey data and modeling) by RY20. However, harvest objectives have not been met because of low hunter participation.

During the three years that the IM program was active, a total of 38 (64%) wolves were removed by ADF&G staff on the calving grounds versus 21 (36%) taken from the wolf assessment area by hunters and trappers. Since suspension of the IM program in RY10, a total of 35 wolves (57%) were harvested by nonresident hunters and 26 wolves (43%) were taken by residents through RY19. Nonresident hunters harvest most of the wolves in Unit 9D and maintaining a tag fee exemption for nonresidents is expected to keep harvest at such a level where the department does not expect to implement active predation control in the near future.

To comply with the protocol for intensive management plans, ADF&G is removing unnecessary and outdated information from regulation and introducing specific language for the intensive management plan for the SAPCH predation management area. There have been no significant changes to the plan. This reauthorization proposal allows the board to modify the programs objectives and give further guidance to ADF&G if warranted.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F21-041)  
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## **PROPOSAL 206**

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

Open a resident only early/late season for brown bear in Unit 9 as follows:

The best solution would be for the Board of Game to provide a resident only early/late season by including the original season dates in Unit 9 that were wrongly shortened for residents in 2018:

#### **Unit 9 Alaska Peninsula brown/grizzly bear**

**RBXXX or DBXXX Resident only fall season, odd numbered years, October 1–6**

**RBXXX or DBXXX Resident only spring season, even numbered years, May 26-31**

Another solution would be to create a resident only draw hunt with a limited allocation determined by the Department of Fish and Game, mirroring the current RB368, 369, and 370 registration hunts, to allow a spring season on odd numbered years and a fall season on even numbered years.

#### **Unit 9 Alaska Peninsula brown/grizzly bear**

**DBXXX Resident only fall season, even numbered years, October 1–21**

**DB XXX Resident only spring season, odd numbered years, May 10–31**

**What is the issue you would like the board to address and why?** Resident hunting and harvest opportunity for brown bear in Unit 9.

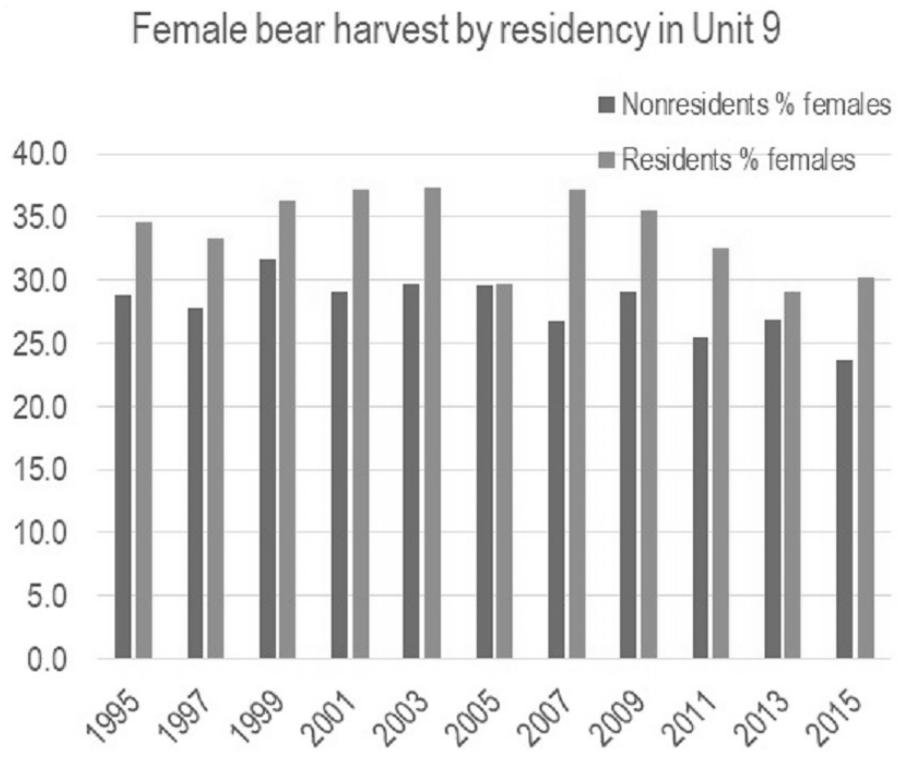
We continue to receive reports of conflicts between resident brown bear hunters and guides in Unit 9, particularly those guides that operate on federal lands with exclusive guide concessions. We also continue to receive reports of conflicts among different guides on state lands in Unit 9, as well as among guides and resident hunters. There are limited places to land an aircraft, and guides have most areas essentially “locked up.” The limited number of air taxis that will fly into Unit 9 often won’t fly resident hunters because of agreements with guides. When resident hunters do fly in they often get complaints from guides that it is “their area” and they should move on to another place, and if they go somewhere else they run into the same issues where competition between the nonresident hunters/guides and resident hunters leads to conflicts.

During the last Region IV (Central/Southwest) cycle, Resident Hunters of Alaska (RHAK) addressed this with Proposal #132, requesting resident-only early spring and fall brown bear seasons in Unit 9. We included data from the ADF&G on harvest levels by residents and nonresidents that showed (and still does) that nonresident guided hunters take 80 percent of the brown bear harvest each season.

Surprisingly, ADF&G stated during the last Region IV cycle meeting that they suddenly had conservation/biological concerns for the Unit 9 brown bear population, after years of unlimited nonresident opportunity and nonresident guided hunters taking 80 percent of the harvest. The board amended our proposal to do the very opposite of what we requested and shortened the spring and fall brown bear seasons in Unit 9 by one week for both residents and nonresidents based on those ADF&G concerns. From the meeting summary on Proposal 132: “Open a resident-only early

season for the current registration brown bear hunts in Unit 9, or open resident-only registration or drawing permit hunts. The board amended the proposal by changing the existing registration hunt dates in Unit 9 to October 7-21, and May 10-25, excluding the subsistence hunts.”

This was completely uncalled for as nonresident guided hunters are the component continually taking the vast majority of the harvest in Unit 9, and are most responsible for any overhunting or other biological effects on the bear population. Resident hunters should not have had their seasons shortened when it is nonresident hunters taking so much of the harvest.



As to sow harvests, the graph below from the ADF&G shows that the sow harvests among residents and nonresidents are not that far apart, but this data is misleading because it compares the total nonresident harvests with the total resident harvests:

This data below, also from ADF&G is a better example of what is really going on with sow harvests, and shows that it is the nonresident hunters who are overwhelmingly taking the vast majority of the sows among the Unit 9 brown bear population:

	<b>Nonresidents</b>		<b>Residents</b>	
	<u>no. females</u>	<u>% females</u>	<u>no. females</u>	<u>% females</u>
1995	109	28.8	45	34.6
1997	121	27.8	41	33.3
1999	166	31.7	53	36.3
2001	156	29.1	48	37.2
2003	143	29.7	54	37.2
2005	153	29.5	35	29.7

2007	139	26.7	39	37.1
2009	142	29	38	35.5
2011	123	25.4	39	32.5
2013	110	26.8	25	29.1
2015	87	23.7	26	30.2

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F21-012)  
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**PROPOSAL 207**

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

Close brown bear hunting in Unit 9A as follows.

Page 65 in the 2020-2021 Alaska Hunting Regulations:

**Proposed Action:** Close Game Management Subunit 9A to brown bear hunting (currently designated as Registration Permit Hunts RB368 and RB370) with no open season in all Regulatory Years, odd and even.

As it stands now, it is recognized that in RY2022 all of Unit 9 is already closed to brown bear hunting and it should remain so. The intent of this proposal is to close future Regulatory Years to brown bear hunting in Unit 9A. It is also recognized a Spring RY2020 Unit 9 brown bear season was approved in 2020 and is ongoing at proposal deadline. Per ADF&G, results from that hunt will not be available until late June, 2021 at the earliest. And it is recognized fall and spring RY2021 Unit 9 brown bear hunts are already scheduled, making three consecutive season hunts (spring, fall, spring) at a time when the Unit 9A brown bear population is already overharvested. Consideration should also be given to closing Unit 9A brown bear seasons in RY2021 by emergency order.

**What is the issue you would like the board to address and why?** Brown bear management in Unit 9 is on a subunit basis. The brown bear population in Unit 9A is small, under increasing and unsustainable hunting pressure, and is likely declining. The Unit 9A hunting season should be closed in all regulatory years, odd and even, to protect that resource.

Measured by the number of permittees who reported hunting, ADF&G data indicates increasing hunting pressure RY2011-RY2017 in Unit 9A though it is decreasing in Unit 9 as a whole. Accordingly, based on ADF&G bear populations estimates and reported kills, the Unit 9A brown bear harvest is unsustainable. Contrary to Unit 9 as a whole, Unit 9A reported brown bear kills have been increasing RY2011-RY2017. Based on ADF&G Unit 9 population estimates and density extrapolations, the brown bear population estimate for the portion of Unit 9A open to hunting is low. The average annual harvest for the period RY2011-RY2017 from that same area open to hunting is 11.6%, well above the level ADF&G considers sustainable (6-8%).

Although “widely misinterpreted by Division staff” (Interpretation of Bear Harvest Data, Miller and Miller, 1990), brown bear age-at-death data is still used by ADF&G to evaluate the status of the Unit 9 brown bear population. Namely, ADF&G maintains the lack of change in that metric indicates a stable population. But even by that apparent misinterpretation, ADF&G harvest age

data for Unit 9A shows a significant decline in the average age of harvested male bears from 2014-2015 to 2016-2017 (10.9 to 9.1 years of age). In 2018-2019 it fell further, to 8.1 years of age, though that was on a smaller sample size due to pandemic-influenced, reduced non-resident hunting effort.

While the area open to hunting is comparatively small, Unit 9A also represents an important link in the coastal brown bear habitat between Lake Clark National Park and McNeil River State Game Sanctuary and Refuge, both of which are increasingly popular brown bear viewing areas. Closing Unit 9A to brown bear hunting would increase the opportunity, and just as important, the appeal for expanded bear-viewing along the coast with increased positive economic impacts to the state and local economies. ADF&G could institute a system similar to registration permits but which would require the payment of permit fees for bear-viewers and bear-viewing operators using that portion of Unit 9A to replace and likely dramatically increase any state revenue lost by its closure to bear hunting.

More analysis and information will be provided in proposal commentary when more data and reports are available from ADF&G in the coming months, including the first Species Management Report since 2014 which should be available by late summer. Based on some of the information available now, following is a more detailed analysis in support of the closure of Unit 9A to brown bear hunting. All data is from ADF&G reports and correspondence. In most cases, RY2019 data is not used for comparisons due to the pandemic-related anomaly of the Spring 2020 hunt.

Overall, since RY2011, registration permit data indicates the number of hunters in Unit 9 has been declining. The number of Unit 9 permittees who reported hunting in RY2017 was substantially lower, less than half (48.5%) of those who reported hunting in RY2011. Similarly, reported RY2011-RY2017 harvests for Unit 9 have been declining with the RY2017 reported harvest only 39.5% of RY2011 reported harvest.

But contrary to Unit 9 overall, in Unit 9A the number of permittees who reported hunting in RY2017 was substantially higher, an increase of 173.4% over those who reported hunting in Unit 9A in RY2011. Similarly, and contrary to Unit 9 as a whole, Unit 9A reported harvest in RY2017 was also substantially higher, up 157.5% from the RY2011 reported harvest.

These ADF&G permit and harvest data for Unit 9A indicate increasing hunting pressure and harvest in the small portion of Unit 9A open to hunting.

From the “Species Management Report & Plan, in prep. Crowley 2021, Table 1. Bear abundance and density estimates in Unit 9, 1989 – 2005”, based on 2003 surveys, the most recent conducted in Unit 9A, the ADF&G average of the two 2003 Double Count Distance Sampling (DCDS) population estimates (693 and 703 bears) for all of Unit 9A, including areas closed to hunting, is 698 bears. From the same ADF&G report, the average of the two 2003 DCDS population estimates (367 and 406 bears) for the portion of Lake Clark National Park in Unit 9A, which is closed to hunting, is 387 bears. That leaves an average estimate of 311 bears in the areas of Unit 9A outside of Lake Clark National Park. However, the McNeil River State Game Sanctuary and Refuge is also part of Unit 9A and is also closed to bear hunting. The most recent published “Brown Bear Management Report” for Unit 9 (1 July 2012 to 30 June 2014) states “The McNeil River State Game Sanctuary and national parks within Unit 9 are thought to contain 2,000-2,500 additional

brown bears.” At a combined area of approximately 1000 km<sup>2</sup> for the Sanctuary and Refuge, and using the lowest ADF&G Unit 9A bear density estimate of 122 bears/1,000km<sup>2</sup>, that extrapolation would yield a population estimate of at least 100 bears in the McNeil River State Game Sanctuary and Refuge which is also closed to hunting. Using these most recent ADF&G-based estimates, the area of Unit 9A open to hunting has an estimated population of approximately 211 bears. This is considerably lower than the Unit 9A estimate of 296 bears in the area open to hunting which ADF&G had used for 30+ years.

For the four regulatory years with open seasons (RY2011, RY2013, RY2015 and RY2017), ADF&G Unit 9A reported brown bear harvest data (not including illegal or unreported kills) is 40, 45, 48, and 63 respectively. The average of the annual reported harvest percentage during that eight-calendar year period is 11.6%, well above the level ADF&G considers sustainable (6-8%). The RY2017 reported harvest alone represents 29.8% of the estimated population in the Unit 9A area open to hunting. An additional Spring RY2020 Unit 9 season was approved by the Board of Game (board) in 2020. Results from that hunt are not available as of the proposal deadline. RY2021 Unit 9 fall and spring hunts are already approved making a total of three consecutive Unit 9 open seasons when Unit 9A has already been subject to unsustainable hunting pressure. Conservative management principles would include closing Unit 9A brown bear seasons in RY2021 as well.

In Unit 9A, the small part currently open to hunting representing a small part of total Unit 9, there is another, more sustainable and revenue-producing use of brown bear. The economic impact of bear-viewing and the bear viewing industry has grown dramatically along western Cook Inlet from Lake Clark National Park to the McNeil River State Game Sanctuary and Refuge and Katmai National Park. Closing Unit 9A to brown bear hunting and the elimination of the current unsustainable harvest level will promote even more bear-viewing opportunity and positive economic impact as the Unit 9A bear population increases. ADF&G could implement a fee-based registration permit system for bear-viewers and bear-viewing operations using the state lands in Unit 9A between Lake Clark National Park and the McNeil River State Game Sanctuary and Refuge. This would result in a substantial boost to ADF&G revenue and allow bear-viewers to financially support their interests in wildlife. And the inevitable increase in the Unit 9A brown bear population will also in time increase the population in adjacent Unit 9B, which would remain open to hunting on the alternating, odd-RY schedule.

I urge approval of this proposal and will provide additional information before the January 2022 Board of Game meeting comment deadline.

**PROPOSED BY:** Wayne Hall (HQ-F21-016)  
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**PROPOSAL 208**

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

Change the brown bear hunting seasons in Unit 9C to align with Unit 9A as follows.

If the Board of Game adopted this solution, the new regulation would be as follows:

**1) SEASON DATES EVEN NUMBERED YEARS:**

Units 9A, 9B and **9C**: May 10-May 31; Units 9D, and 9E: May 10-May 25

**2) SEASON DATES ODD NUMBERED YEARS:**

Unit 9A and **9C**: October 1 – October 21; Units 9D and 9E: October 7 – October 21

*Note: The map referenced in this proposal is available on the Board of Game proposal book webpage at: <http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>.*

**What is the issue you would like the board to address and why?** The issue I would like to see the Board of Game address is the change of season dates in Unit 9C to align more with the “upper Alaskan Peninsula” season dates of Unit 9A.

Unit 9C, when looked at on a map (attached), is primarily the Katmai Preserve on the northern side, then wraps around to the west (BLM lands and private lands) and down towards the south, connecting to a small section of state land on the lower southwest corner. This is highlighted yellow on the attached Game Management Unit 9 map for reference.

When looking at Unit 9C, one can see that the majority of land is the Katmai National Park, where hunting is prohibited. This national park acts as a buffer from the lower Alaskan Peninsula of Units 9E and 9D. When the dates changed, Unit 9C was left out of being included with keeping its original dates of the upper peninsula like 9A and 9B and was instead “looped in” with 9E and 9D.

Unit 9C being on the upper Alaskan Peninsula has weather trends that are totally different from Units 9E and 9D. Unit 9C is adjoining 9B to the north and the majority of the southern line is the Katmai National Park adjoining Unit 9E to the south. In the fall and the spring, Units 9C’s weather patterns are more identical to Units 9A and 9B, rather than 9E and 9D. In the winter Unit 9C’s colder winter weather comes much earlier. In the spring the thaw tends to be much later. So with the change of the seasons to match the lower Alaskan Peninsula Units 9E and 9D, this puts 9C at a disadvantage of bear activity and movement and the weather patterns tend to limit successful hunting opportunity. The area in Unit 9C that is open to hunting is very small and limited since the majority of 9C is Katmai National Park, closed to hunting. By changing the seasons back to the original dates will allow both resident and nonresident opportunities at better weather patterns more in line with Units 9A and 9B with better success as well.

**PROPOSED BY:** Cabot Pitts (EG-F21-020)

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