



Alaska Board of Game

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

<https://boardofgame.adfg.alaska.gov>

Dear Reviewer,

September 2024

The Alaska Board of Game (board) will consider the enclosed regulatory proposals during the board meetings scheduled for **January and March 2025**. The proposals primarily concern changes to hunting and trapping regulations pertaining to the Central and Southwest Region (Game Management Units 9, 10, 11, 13, 14A, 4B, 16 & 17) and Statewide Regulatory Provisions under 5 AAC Chapters 92 and 98. The book also includes annual reauthorizations for antlerless moose hunts and brown bear tag fee exemptions, and Unit 19C sheep hunting proposals deferred from the March 2024 board meeting.

The proposals have been submitted by members of the public, organizations, advisory committees, ADF&G, and other agencies. With the exception of minor edits and clarifications, the proposals are published essentially as they were received, with the insertion of the appropriate Alaska Administrative Code citation and a brief description of the action requested. The proposals are often presented as brief statements summarizing the intended regulatory changes. Proposed changes are also often written in legal format for which bold and underlined words indicate **additions** to the regulation text, and capitalized words in square brackets indicate [DELETIONS].

Readers are encouraged to view all proposals as some apply statewide or affect multiple units or regions. Proposals are grouped by each meeting to which they pertain (see Proposal Indices). The proposals are listed in the tentative order in which they are expected to be considered during the meeting. The final order of all proposals to be deliberated on, also known as the “roadmap,” will be available approximately two weeks prior to the meetings.

Public Comment Requested: Before taking action on these proposed changes to the regulations, the board would like to consider your written comments and/or oral testimony on any effects the proposed changes would have on your activities and interests. The board relies heavily on written comments and oral testimony explaining the effect of the proposed changes. Public comments, in combination with advisory committee comments and ADF&G staff reports, provide the board with useful biological and socioeconomic data to form decisions. Anyone interested in or affected by the subject matter contained in the proposals scheduled for the January and March 2025 meetings are encouraged to provide written or oral comments if they wish to have their views considered by the board.

Written comments can be submitted to the board by the announced deadlines as follows:

Online: <https://boardofgame.adfg.alaska.gov>

Fax: 907-465-6094

Mail: ADF&G Boards Support Section

ATTN: Board of Game Comments

P.O. Box 115526 | Juneau , AK 99811-5526

Comments received by the announced deadlines will be included in the board meeting workbooks and posted on the meeting website for public viewing in advance of the meetings. Comments can also be submitted once the meeting begins. **Please review the additional information for providing written comment and oral testimony to the board on page v.**

Meeting information, documents, and a link to the audio is available through the Board of Game website at <https://boardofgame.adfg.alaska.gov> or by contacting ADF&G Boards Support Section. Please watch the website for notices and updates closer to the meeting dates, or sign up to receive notices about the Board of Game at: www.adfg.alaska.gov/index.cfm?adfg=process.emailsubscription .

To learn the board actions on proposals, a preliminary summary will also be posted on the meeting website during each meeting. Afterwards, a final meeting summary will be provided which will direct viewers to the audio recording for the board discussion on each section of proposals.

Persons with a disability needing special accommodations in order to comment on the proposed regulations should contact the Boards Support Section at (907) 465-6098 at least two weeks prior to the schedule meeting to make any necessary arrangements.

Thank you for your interest and involvement with the Alaska Board of Game and the regulatory process.

Sincerely,

A handwritten signature in black ink that reads "Kristy Tibbles". The signature is written in a cursive style and is positioned above the typed name and title.

Kristy Tibbles, Executive Director
Alaska Board of Game

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Guidelines for Written Comments and Public Testimony

The Board of Game (board) relies heavily on information provided by the public. Explaining the effect of the proposed changes help inform the board members for their decisions on the hundreds of proposals scheduled for consideration each year. The following information provides guidelines and helpful tips to be effective with submitting written comments and oral testimony.

GUIDELINES FOR WRITTEN COMMENTS

Timely submission: Written comments are strongly encouraged to be submitted online at <https://boardofgame.adfg.alaska.gov>, by the set deadline for each meeting, usually two weeks in advance. Comments can be submitted on an online form that will allow comments to be uploaded as a file or entered manually. Boards Support does not accept comments for board meetings via email.

Comments received by the deadline are provided to the board and the public on the meeting information webpages in advance of the meeting. Each public and advisory committee comment is indexed, assigned a public comment ("PC") or advisory committee ("AC") log number, and cross-referenced with proposals. Comments are public documents and part of the board record.

Tips for format and content:

- Clearly state the proposal number and your position by indicating "support" or "oppose". If the comments support a modification in the proposal, please indicate "support as amended" and provide your preferred amendment in writing.
- Briefly explain why you support or oppose the proposal to help the board members understand the pros and cons of each issue. Board actions are based on a complete review of the facts involved, not the sum of total comments for or against a proposal.
- For advisory committees (AC), meeting recommendations should reflect why the AC voted as it did. If the vote was split, include the minority opinion. A brief description consisting of a couple sentences is sufficient.
- Include your name and if including graphs or charts, please indicate the source.
- If using acronyms, please state what the acronym stands for.
- Page limits: For on-time comments, up to 100 single-sided pages from any one individual or organization; during the meeting, comments are limited to ten single-sided pages.
- If commenting on multiple proposals, please do not use separate pieces of paper.
- If handwriting comments, write clearly, use dark ink and write legibly. Comments will be scanned and photocopied so please use 8 1/2" x 11" paper and leave reasonable margins.

Comments submitted as Record Copies: Once a board meeting has convened, written comments will be accepted during the board meetings via online form, fax, or hand-delivery. Comments received by Boards Support during the meeting will be logged with a record copy ("RC") number and distributed to the board members two to three times each day. Comments submitted during a board meeting are limited to ten single-sided pages. As a practical matter, comments submitted during the meeting are likely to receive less consideration from the board than those submitted by the deadline.

GUIDELINES FOR ORAL PUBLIC TESTIMONY

Oral hearings are scheduled at the beginning of each regulatory meeting, typically following agency reports, and continue until everyone who has signed up by the announced deadline and is present when called has been given the opportunity to be heard. Advisory Committee (AC) and Regional Advisory Council (RAC) representatives may elect to provide testimony at a later portion of the meetings.

Persons planning to testify at Board of Game meetings must sign up with the Boards Support staff prior to the announced cut-off time. If submitting written or visual content at the meeting to accompany oral testimony, please review the guidelines for submitting written comments. At the discretion of the chair, PowerPoint presentations may be allowed, and will require a hard copy of the presentation be provided to Boards Support staff well in advance.

Once the oral hearing portion of the meeting begins, Boards Support staff will prepare and post a list of testifiers. The chair will call testifiers in the order provided on the list. When it is your turn to testify, please go to the testimony table, press the button on the microphone, and state your name for the record, where you reside and whom you represent, if speaking for an organization. When giving testimony, be sure to reference the proposal number as well as the title or subject matter, and the public comment or record copy log number for any written material accompanying your testimony. Follow the tips for comments shown on the previous page.

The board utilizes a light indicator system for timing testifiers. When you begin your testimony, a green light will come on. When you have one-minute remaining, a yellow light will come on followed by a red light or buzzer to indicate your time is up. When you are finished speaking, please stay seated and wait for any questions board members may have regarding your comments. Be aware that when you testify, you may not ask questions of board members or of agency staff. This is your chance to make comments on proposals before the board. If board members and/or department staff need clarification, they will ask you questions. **Please do not use derogatory or threatening language or you will not be allowed to continue speaking.**

The board allows testimony for one organization in addition to personal testimony, or AC testimony. Each testimony is allotted its own time. **If you are giving testimony for yourself and an organization or an AC**, you only need to sign-up once entering your name and the group you wish to speak for. When giving testimony for yourself and an organization or AC, state on the record who you are speaking for. For example: give comments for the organization you are representing, then, after stating clearly that you are now testifying for yourself, give your personal comments.

The length of testimony time will be announced on the agenda prior to each meeting and stated by the board chair at the beginning of the meeting. The board typically allows five minutes for oral testimony for an individual or organization and 15 minutes for ACs and Regional Advisory Councils. Time limits on testimony do not include questions the board members may have for you. Preparing and practicing your testimony ahead of time will help ensure you stay within the time limit, while making your points clear.

Note: Updates related to public testimony and submitting public comments will be provided via advisory announcement prior to each meeting. Please watch the board's website for any updates or sign up to receive announcements via email at <https://www.adfg.alaska.gov/index.cfm?adfg=process.emailsubscription>.



Alaska Board of Game

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www.adfg.alaska.gov/index.cfm?adfg=process.regcoordinators



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ALASKA BOARD OF GAME
2024/2025 Cycle
Tentative Meeting Dates

Meeting Dates	Topic	Location	Comment Deadline
January 9, 2025 (1 day)	Work Session	Wasilla Best Western Lake Lucille Inn	TBD
January 10-17, 2025 (8 days)	Central & Southwest Region Game Management Units 9, 10, 11, 13, 14A, 14B, 16 & 17	Wasilla Best Western Lake Lucille Inn	December 27, 2025
March 21-28, 2025 (8 days)	Statewide Regulations 5 AAC Chapters 92 and 98	Anchorage Egan Civic & Convention Center	March 7, 2025

Total Meeting Days: 17

Agenda Change Request Deadline: Friday, November 1, 2024

(The Board of Game will meet via teleconference to consider Agenda Change Requests following the November 1 deadline.)



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Long-Term Meeting Cycle

The Board of Game meeting cycle generally occurs from November through March. The board considers changes to regulations on a region-based schedule that cycle every three years. When the regional regulations are before the board, the following regulations are open for consideration within that region:

- Trapping Seasons and Bag Limits -- All species
- General and Subsistence Hunting Seasons and Bag Limits -- All species (Except antlerless moose hunts as noted below)
- Intensive Management Plans
- Closures and Restrictions in State Game Refuges
- Management Areas, Controlled Use Areas, and Areas Closed to Hunting and Trapping
- Changes specific to Units or Regions under 5 AAC Chapter 92, excluding Game Management Unit Boundaries in 92.450

Proposals pertaining for the reauthorization of all antlerless moose hunts, 5 AAC 85.045, and all brown bear tag fee exemptions, 5 AAC 92.015, are taken up annually. Changes having statewide applicability to 5 AAC Chapters 92 and 98.005 listed on the following page and Game Management Units are considered once every three years at Statewide Regulations meetings.

The proposal deadline is May 1 every preceding year. Boards Support issues a “Call for Proposals” generally in January before the May 1 deadline, which will also specify which regulations are open for proposed changes.

Topic & Meeting Schedule
<p>Southeast Region - Game Management Units: 1, 2, 3, 4, 5 <i>Meeting Cycle: 2025/2026 2028/2029 2031/2032</i></p>
<p>Southcentral Region - Game Management Units: 6, 7, 8, 14C, 15 <i>Meeting Cycle: 2025/2026 2028/2029 2031/2032</i></p>
<p>Western Arctic / Western Region - Game Management Units: 18, 22, 23, 26A <i>Meeting Cycle: 2023/2024 2026/2027 2029/2030</i></p>
<p>Interior and Eastern Arctic Region - Game Management Units: 12, 19, 20, 21, 24, 25, 26B, 26C <i>Meeting Cycle: 2023/2024 2026/2027 2029/2030</i></p>
<p>Central and Southwest Region - Game Management Units: 9, 10, 11, 13, 14A, 14B, 16, & 17 <i>Meeting Cycle: 2024/2025 2027/2028 2030/2031</i></p>
<p>Statewide Regulations* (see next page) <i>Meeting Cycle: 2024/2025 2027/2028 2030/2031</i></p>
<p><i>*5 AAC 92.037. Permits for falconry is scheduled every six years: 2027/2028 2033/2034 2039/2040</i></p>

ALASKA BOARD OF GAME
Statewide Regulations ~ 5 AAC Chapters 92 and 98

General Provisions & Definitions:

- 92.001 Application of this Chapter
- 92.002 Liability for Violations
- 92.003 Hunter Education and Orientation Requirements
- 92.004 Policy for Off-Road Vehicle Use for Hunting and transporting game.
- 92.005 Policy for Changing the Board of Agenda
- 92.008 Harvest Guideline Levels
- 92.009 Policy Obstruction or Hindrance of Lawful Hunting or Trapping
- 92.990 Definitions

Licenses, Harvest Tickets, Reports, Tags, & Fees:

- 92.010 Harvest Tickets and Reports
- 92.011 Taking of Game by Proxy
- 92.012 Licenses and Tags
- 92.013 Migratory Bird Hunting Guide Services
- 92.018 Waterfowl Conservation Tag
- 92.019 Taking of Big Game for Certain Religious Ceremonies

Permits:

- 92.020 Application of Permit Regulations and Permit Reports
- 92.028 Aviculture Permits
- 92.029 Permit for Possessing Live Game
- 92.030 Possession of Wolf Hybrid and Wild Cat Hybrids Prohibited
- 92.031 Permit for Selling Skins, Skulls, and Trophies
- 92.033 Permit for Science, Education, Propagative, or Public Safety Purposes
- 92.034 Permit to Take Game for Cultural Purposes
- 92.035 Permit for Temporary Commercial Use of Live Game
- 92.037 Permit for Falconry (to be *addressed every 6 years*)
- 92.039 Permit for Taking Wolves Using Aircraft
- 92.040 Permit for Taking of Furbearers with Game Meat
- 92.041 Permit to Take Beavers to Control Damage to Property
- 92.042 Permit to Take Foxes for Protection of Migratory Birds
- 92.043 Permit for Capturing Wild Furbearers for Fur Farming
- 92.044 Permit for Hunting Bear w/the Use of Bait or Scent Lures
- 92.047 Permit for Using Radio Telemetry Equipment
- 92.049 Permits, Permit Procedures, and Permit Conditions
- 92.050 Required Permit Hunt Conditions and Procedures
- 92.051 Discretionary Trapping Permit Conditions & Procedures
- 92.052 Discretionary Permit Hunt Conditions and Procedures
- 92.057 Special Provisions for Dall Sheep Drawing Permit Hunts
- 92.061 Special Provisions for Brown Bear Drawing Permit Hunts
- 92.062 Priority for Subsistence Hunting; Tier II Permits
- 92.068 Permit Conditions for Hunting Black Bear with Dogs
- 92.069 Special Provisions for Moose Drawing Permit Hunts
- 92.070 Tier II Subsistence Hunting Permit Point System
- 92.071 Tier I Subsistence Permits
- 92.072 Community subsistence Harvest Hunt Area and Permit Conditions

Methods & Means:

- 92.075 Lawful Methods of Taking Game
- 92.080 Unlawful Methods of Taking Game; Exceptions
- 92.085 Unlawful Methods of Taking Big Game; Exceptions
- 92.090 Unlawful Methods of Taking Fur Animals
- 92.095 Unlawful Methods of Taking Furbearers; Exceptions
- 92.100 Unlawful Methods of Hunting Waterfowl, Snipe, Crane
- 92.104 Authorization for Methods and Means Disability Exemptions

Intensive Management and Predator Control:

- 92.106 Intensive Management of Identified Big Game Prey Populations
- 92.110 Control of Predation by Wolves
- 92.115 Control of Predation by Bears
- 92.116 Special Provisions in Predation Control Areas

Possession and Transportation:

- 92.130 Restrictions to Bag Limit
- 92.135 Transfer of Possession
- 92.140 Unlawful Possession or Transportation of Game
- 92.141 Transport, Harboring, or Release of Live Muridae Rodents Prohibited
- 92.150 Evidence of Sex and Identity
- 92.151 Destruction of trophy value of game required in specific areas.
- 92.160 Marked or Tagged Game
- 92.165 Sealing of Bear Skins and Skulls
- 92.170 Sealing of Marten, Lynx, Beaver, Otter, Wolf, and Wolverine
- 92.171 Sealing of Dall Sheep Horns

Use of Game:

- 92.200 Purchase and Sale of Game
- 92.210 Game as Animal Food or Bait
- 92.220 Salvage of Game Meat, Furs, and Hides
- 92.230 Feeding of Game
- 92.250 Transfer of Musk oxen for Science and Education Purposes
- 92.260 Taking Cub Bears & Female Bears with Cubs Prohibited

Emergency Taking of Game:

- 92.400 Emergency Taking of Game
- 92.410 Taking Game in Defense of Life or Property
- 92.420 Taking Nuisance Wildlife

Game Management Units:

- 92.450 Description of Game Management Units

Antlerless Moose Reauthorization:

- 98.005 Areas of Jurisdiction for Antlerless Moose Season



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About the Board of Game & Advisory Committees

Alaska Board of Game

The Board of Game (board) is Alaska's regulatory entity authorized to adopt regulations to conserve and develop the state's wildlife resources and to allocate uses of those resources. This includes establishing open and closed seasons, areas for taking game, setting bag limits, and regulating methods and means. The board consists of seven members, serving three-year terms. Each member is appointed by the governor and confirmed by the Alaska State Legislature.

The board considers regulatory topics on a three-year cycle, holding two to three meetings each year to address proposed regulations on a regional basis. Each year, the board solicits proposals for new regulations and changes to existing regulations. Any individual or organization may submit proposals and offer oral and/or written testimony for the board's consideration. More information about the Board of Game members, process and meeting information is online at: <https://boardofgame.adfg.alaska.gov>

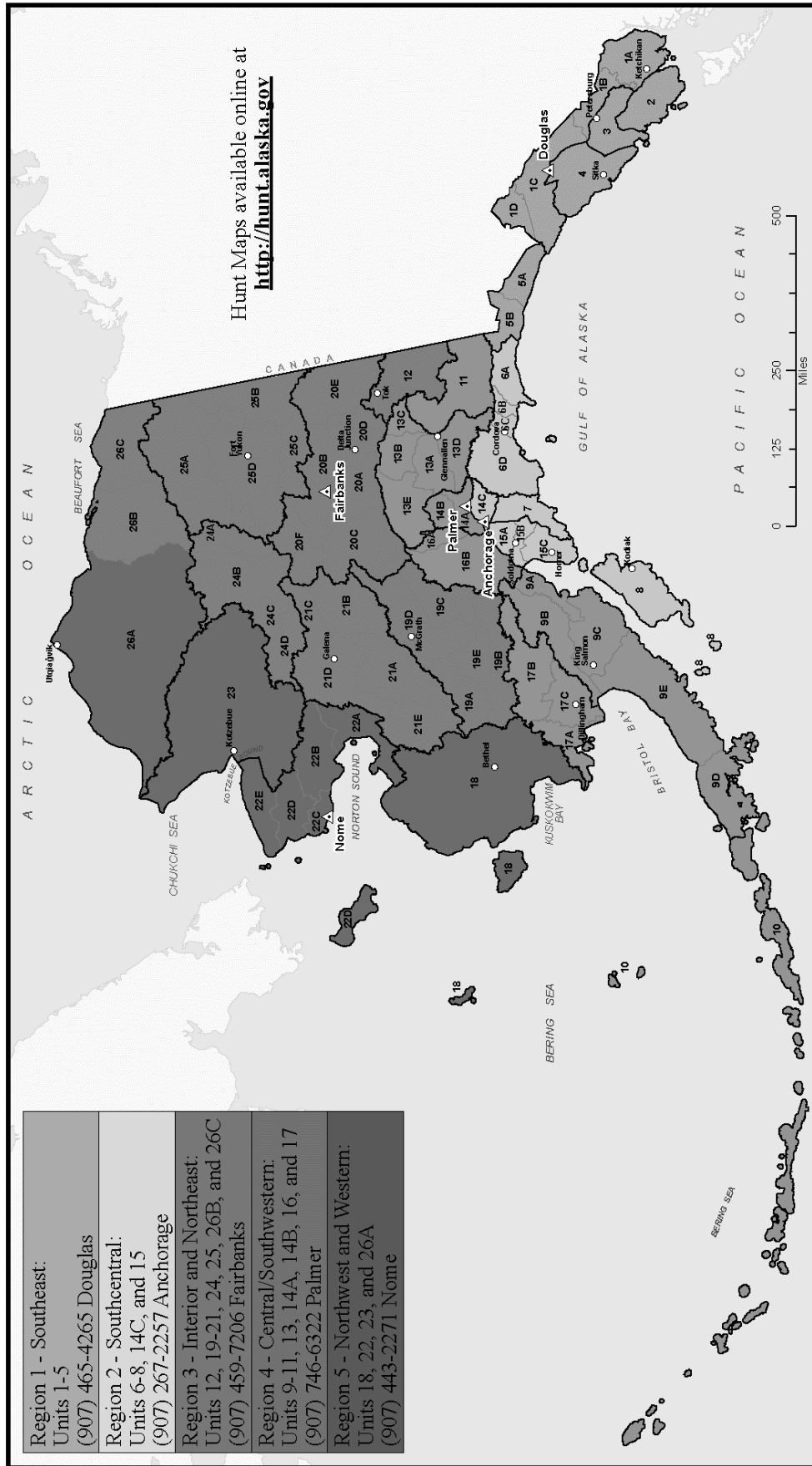
Fish and Game Advisory Committees

The local fish and game advisory committees (ACs) play a key role in the regulatory process for both fisheries and wildlife management. While the boards make the final decisions on proposed regulations, they rely heavily on ACs to offer their local knowledge on fish and wildlife issues of interest by submitting proposals and comments on proposals.

There are 84 ACs in the state; nearly all actively participate in the state regulatory process as well as the federal subsistence process. ACs have up to 15 members and many have community seats designated under regulation. AC members serve three-year terms and are elected by local community members. ACs begin meeting as early as September and throughout the board meeting cycle to review proposals and submit recommendations to the boards. Meetings are open to the public and meeting information is online at: <https://advisory.adfg.alaska.gov>, or from Boards Support Regional Coordinators.

Boards Support Regional Coordinators facilitate AC participation in the regulatory process by coordinating AC meetings and ensuring the ACs have the necessary information to be effective before the boards. Contact information for the Regional Coordinators can be found on the Boards Support staff listing on page viii.

Region and Game Management Unit Boundaries



Commonly Used Acronyms & Terms

AAC	Alaska Administrative Code	Region II	Southcentral Region – Game Management Units 6, 7, 8, 14C, & 15
AC	Advisory Committee	Region III	Interior & Eastern Arctic Region Game Management Units 12, 19, 20, 21, 24, 25, 26B & 26C
ADF&G	Alaska Department of Fish and Game	Region IV	Central & Southwest Region – Game Management Units 9, 10, 11, 13, 14A, 14B, 16 & 17
ANS	Amount Necessary for Subsistence	Region V	Western Arctic & Western Region – Game Management Units 18, 22, 23 & 26A
AS	Alaska Statute	RAC	Federal Regional Advisory Council
AWT	Alaska Wildlife Troopers	SAP	Southern Alaska Peninsula caribou herd
BOG/Board	Board of Game	SDA	Same Day Airborne
BGCSB	Big Game Commercial Services Board	SHS	Selective Harvest Strategy
C.I.	Confidence Interval	USF&WS	U.S. Fish and Wildlife Service
C&T	Customary and Traditional Use	2DK	Second degree of kindred
CUA	Controlled Use Area	Permit Hunt Abbreviations	
DLP	Defense of Life and Property	<i>Some proposals reference specific permit hunt numbers that begin with the initials to indicate the type of hunt and big game animal, followed by three digits for the hunt number:</i>	
DWC	Division of Wildlife Conservation	RB	Registration brown bear
EO	Emergency Order	RC	Registration caribou
FSB	Federal Subsistence Board	RG	Registration goat
GMU/Unit	Game Management Unit	RL	Registration black bear
GSPE	Geospatial Population Estimator	RM	Registration moose
GUA	Guide Use Area	RX	Registration Musk ox
GCP	Guide Concession Program	DB	Drawing brown bear
HGL	Harvest Guideline Level	DC	Drawing caribou
IM	Intensive Management	DG	Drawing goat
MCH	Mulchatna caribou herd	DL	Drawing black bear
NAP	Norther Alaska Peninsula caribou herd	DM	Drawing moose
NFQU	Non-federal qualified users	DS	Drawing sheep
NPS	National Park Service	YS	Youth sheep
OSM	Office of Subsistence Management, U.S. Dept. of the Interior	DX	Drawing must ox
RY	Regulatory Year; July 1- June 30	YM	Youth moose
Region I	Southeast Region – Game Management Units 1, 2, 3, 4, & 5		

Central & Southwest Region Meeting

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ALASKA BOARD OF GAME
Central and Southwest Region Meeting
Best Western Lake Lucille Inn, Wasilla, Alaska
January 10 - 17, 2025

TENTATIVE AGENDA

Note: This Tentative Agenda is subject to change throughout the course of the meeting. It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

Friday, January 10, 8:30 a.m.

OPENING BUSINESS

Call to Order / Purpose of Meeting

Introductions of Board Members and Staff

Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting. Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

Saturday, January 11, 8:30 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

Sunday, January 12, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

Monday, January 13 thru Thursday, January 16, 8:30 a.m.

BOARD DELIBERATIONS continued

Friday, January 17, 8:30 a.m.

BOARD DELIBERATIONS continued/conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

Agenda Notes

1. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
2. A live audio stream for the meeting is intended to be available at: <https://boardofgame.adfg.alaska.gov>
3. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-4110 no later than two weeks prior to start of the meeting to make any necessary arrangements.

Regionwide & Multiple Units

PROPOSAL 1

5 AAC 92.015. Brown bear tag fee exemption.

Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units as follows:

5AAC 92.015. Brown bear tag fee exemption

(a) A resident tag is not required for taking a brown bear in the following units:

- (1) Unit 11;
- (2) Units 13 and 16(A);
- (3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- (1) Unit 9(B);
- (2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);
- (3) Unit 17;

...

What is the issue you would like the board to address and why? Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for brown bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 and are managed primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The bear seasons and bag limits adopted in 2011 along with the elimination of the tag fee were intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative from the general season hunts for hunters who take brown bears primarily for their meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-064)

Note: This proposal addresses Game Management Units outside the scope of the Central Southwest Region meeting.

PROPOSAL 2

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

5 AAC 95.052. Discretionary permit hunt conditions and procedures.

Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal as follows.

Proposed changes to the following bear baiting seasons are:

Units 1A, 1B, 1C, 1D, 2-3, 5 -----	Apr 15-June 15 / Sept 1-Oct 15
Units 6A, 6B, 6C -----	Apr 15-June 15 / Aug 20-Oct 15
Unit 6D -----	Apr 15-June 10 / Sept 10-Oct 15
Units 7, 9, 11-13, 14A & B, 14C Remainder, 15, 20 -----	Apr 15-June 30 / July 1 - Oct 15
Units 16, 17, 18, 19, 21, 22, 23, 24, 25-----	Apr 1 - Jun 30 / July 1 - Oct 15

With these changes in season dates and caribou herds dropping throughout the State of Alaska, the Department of Fish and Game can regulate / put in emergency orders if the bear population drops too low. In certain units of Alaska, it is harder for some hunters / subsistence users to gain access to their bear baiting sites and being able to hunt them due to the rivers not being safe to travel on.

What is the issue you would like the board to address and why? The Bethel Advisory Committee proposes to have two (2) bear baiting seasons in the State of Alaska in Units where bear baiting is legal. Hunters and subsistence users will have better opportunities to take bears during a two (2) season bear baiting. In certain units throughout the state, hunters & subsistence users may only have two (2) to three (3) weeks to get a legally take a take. There are nineteen (19) out of twenty-six (26) units in Alaska with a NO CLOSED SEASON for black bears.

Current State of Alaska Fish and Game Areas Open for Bear Baiting:

Units 1-(A, B, C), 2-3, 5, 6(A, B, C) -----Apr 15 – Jun 15
Unit 6D* -----Apr 15 – Jun 15
Units 1D, 7,9, 11-13, 14A & B, 14C Remainder, 15, 19(A, B, C, E) ---Apr 15 – Jun 30
19D remainder, 20, 21(A, B, E), 23, 24 A & B, 25(A, B, C)
Unit 16-----Jul 1–Oct 15 / Apr 15-Jun30
Unit 17-----Apr 15-May 31
Unit 18-----Apr 1 – Jun30
Unit 19D East Predator Control Area: Those portions of the Kuskokwim River Drainage within Unit 19D Upstream from Selatna River Drainage and the Black River Drainage 21C & D, 24C & D and 25D-----Aug 1-Sept 30 / Apr 15-Jun 30

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes.

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-016)

Note: This proposal addresses Game Management Units outside the scope of the Central and Southwest Region meeting.

PROPOSAL 3

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

Allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 9, 11, 13, 14B, 16, and 17 as follows:

I would like the Board of Game to allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 7, 9, 11-13, 14A, 14B, 15-21, 23-25, 26B, and 26C, during applicable seasons (same units as airborne). This allows an easily enforceable regulation for law enforcement with concise purpose of use and time when these cameras can be used.

What is the issue you would like the board to address and why? Currently hunters are not allowed to use any camera or other sensory device that can send messages through wireless communication. This includes cellular game cameras over bear bait. These were prohibited with the assumption that this would give an unfair advantage to hunters, yet despite when the hunter gets a photo, he would still have to travel to hunt his bait station often requiring hours of travel

that is not feasible in a reasonable amount of time or the day of. In many units, hunters are already allowed to hunt bears same day airborne as long as they are 300 feet from a plane, which gives a higher advantage than a wireless cell camera could for most hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Caleb Martin (EG-F24-037)

PROPOSAL 4

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

Establish general season, archery only sheep hunts in Units 9, 11, 13, 14A, and 14B as follows:

Units 9, 11, 13, 14A, 14B (or limited to a specific combination of areas if managers see fit),

HT sheep areas only: 1 ram with full curl horn or larger by bow and arrow only,

HT, August 6 - August 9. (Or July 21-31 if an earlier date is preferred)

What is the issue you would like the board to address and why? For many years hunters in Alaska have requested an opportunity to hunt for sheep with archery equipment but there still remains no season or area (aside from the highly sought after DS140/141 draw tags) during which hunters can pursue sheep with a bow and arrow without the pressure and danger associated with hunting during the general rifle season. The author of this proposal has personally been shot at while stalking by rifle hunters who weren't aware of his presence and other anecdotes exist of hunters finding themselves near sheep that others are shooting from far away. The increased popularity of long-range shooting for mountain animals has increased this hazard. (A recent ADF&G survey study on goat harvest in Southeast Alaska showed that about 23% of shots were over 300 yards and some were out to 600!)

In addition, there is an ever-increasing population of hunters who are interested in pursuing sheep with a bow and arrow but who did not feel that there is adequate opportunity to do so without competing directly with rifle hunters especially in "walk-in" areas but also in areas where most hunter fly.

Currently there is a four-day gap between the youth season and the general season in most areas. In the past some opposition to sheep season proposals raised concerns that it would interfere with the youth season, but this would remove that concern because it takes place after the youth season is over. There have also been concerns about archery hunters displacing sheep but many studies from sheep biologists in Canada and Alaska have shown that rams do not move far from their established areas in the pre-rut period even when disturbed. In the worst case the rams spooked by bow hunters might move a few miles but often they just go into nearby escape terrain where they are safe from bowhunters. I have witnessed this behavior many times when bowhunting sheep in multiple mountain ranges of Alaska and even after spooking them, they almost always remain in sight or are easily relocated in an adjacent area. The displacement of sheep by bowhunters in an

early season is simply not a legitimate concern and any skilled mountain hunter will attest to being able to easily relocate sheep that were recently disturbed by a hunter.

The success rates of archery hunting for sheep are also very low so the effect on harvest will be essentially negligible but the increased opportunity will be greatly appreciated by all sheep hunters who are willing to accept some added challenge.

Further concerns have been raised in the past in regard to an early sheep season because it would allow for aerial scouting during season because of the scouting being allowed up to August 10. Please see the other proposal by this author which hopes to establish the “no aerial scouting” period to start on August 1 instead of August 10.

Also, as a matter of precedent, ADF&G has added early archery moose seasons to some of the areas up for proposals this year, including Units 14A and 14B. This has worked well and I’m not aware of any complaints that early season archery moose hunters have had any adverse effects on rifle hunters using the same areas later in the season.

If interference with other hunters was a significant concern, another option could be to move this hunt to July 20th (or some other date at the pleasure of the board), ending by August 1, so as not to interfere (as concerns were raised in the past) with the youth season and to still allow a small period before the general rifle season.

It is also important to note that archery seasons and areas have become very popular and well accepted throughout north America but currently, aside from draw hunts and a very small area in the Dalton Highway Corridor, there is no archery season or area for those wishing to pursue sheep with bow and arrow. Having bow hunted for many years in Alaska, I can attest that having a season, even just a few days, would provide a great amount of enjoyment and adventure for many hunters with essentially zero negative impact on other hunters or the sheep population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed this idea with several biologists at ADF&G and all of them felt that this proposal would have no adverse effect on our declining sheep population but would increase hunting opportunity,

PROPOSED BY: Paul Forward (EG-F24-097)

King Salmon Area – Units 9 & 10

PROPOSAL 5

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

Reduce the nonresident bag limit for caribou in Unit 9D from two bull caribou to one as follows:

Unit 9D. Nonresidents limited to one bull caribou by harvest ticket.

What is the issue you would like the board to address and why? Abuse of the liberal bag limits on bull caribou for nonresident hunters in Unit 9D. The current bag limit is two bulls per regulatory year. This is one of, if not the only, unit in Alaska that still allows nonresidents to take two bulls. The area was just opened up eight years ago after a long closure due to low numbers. Then shortly after opening back up to allow nonresidents to take two bulls seems out of line with the situation and herd. Some guides on state land are taking many hunters and allowing them to take two bulls, which is an abuse of the limited resource. The herd is healthy and trophy quality is good and can withstand sustainable harvest of the mature bulls, but not at the current two bag limit.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Developed in coordination with Unit 9 game biologists in King Salmon along with other commercial use operators in the area.

PROPOSED BY: Jordan Wallace

(EG-F24-046)

PROPOSAL 6

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

Shorten the nonresident hunting season for caribou in Unit 9D as follows:

Unit 9D, nonresident season: Sept. 1-30 by harvest ticket.

What is the issue you would like the board to address and why? Abuse of the liberal seasons on bull caribou for nonresident hunters in Unit 9D. The current season for nonresidents is August 1-September 30. August is a difficult time to keep meat and keep the bugs and heat from spoiling it. Also, hides and antlers in velvet are not prime at this time and also hard to keep from spoiling in these warmer conditions. Additionally, this long season in combination with the limit of two bulls is not sustainable long term. The area was closed for many years and just opened up eight years ago. Then shortly after opening back up, they developed this long season that seems out of line with the situation and herd. The herd is currently healthy and can withstand sustainable harvest of the mature bulls, but not at the current rate.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 7

5 AAC 85.025(4). Hunting seasons and bag limits for caribou.

Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
Unit 9(D) If the harvestable portion is 99 caribou or less:		
RESIDENT HUNTERS: 1 caribou by Tier II subsistence hunting permit only;	Aug. 1–Sept. 30 (Subsistence hunt only) Nov. 15–Mar. 31 (Subsistence hunt only)	
NONRESIDENT HUNTERS:		No open season
If the harvestable portion is greater than 99, but less than 151 caribou:		
RESIDENT HUNTERS: 1 caribou by registration permit only	Aug. 1–Sept. 30 Nov. 15–Mar. 31	
NONRESIDENT HUNTERS:		No open season
If the harvestable portion is greater than 150, but less than 251 caribou:		
RESIDENT HUNTERS: 2 caribou	<u>Aug. 1–Oct. 21</u> [AUG. 1–SEPT. 30] Nov. 15–Mar. 31	
NONRESIDENT HUNTERS:		

2 bulls

Aug. 1–Oct. 21
[AUG. 1–SEPT. 30]

If the harvestable portion
is greater than 250,
but less than 451 caribou:

RESIDENT HUNTERS: **Aug. 1–Oct. 21**
3 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1–Oct. 21
[AUG. 1–SEPT. 30]

If the harvestable portion
is greater than 450,
but less than 551 caribou:

RESIDENT HUNTERS: **Aug. 1–Oct. 21**
4 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1–Oct. 21
[AUG. 1–SEPT. 30]

If the harvestable portion
is great than 550:

RESIDENT HUNTERS: **Aug. 1–Oct. 21**
5 caribou [AUG. 1–SEPT. 30]
Nov. 15–Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1–Oct. 21
[AUG. 1–SEPT. 30]

...

What is the issue you would like the board to address and why? The Southern Alaska Peninsula caribou herd has been showing an increasing population trend with high calf:cow ratios and bull:cow ratios that meet objectives. Currently, the population estimate is around 4,300, with a population objective of 1,500–4,000. To change the trajectory of herd growth and decrease the possibility of the herd crashing, a tiered harvest structure was passed by the Board of Game in 2022. Due to the remoteness of Unit 9D, complicated transportation logistics, and often difficult weather, harvest levels are well below sustainable harvest thresholds and increased harvest is recommended. Nonresident bull caribou harvest exceeded resident harvest in 2018 and has steadily

increased to 64 bull caribou harvested this last season while resident harvest remained steady around 25 caribou harvested each year since 2017 (Figure 1-1).

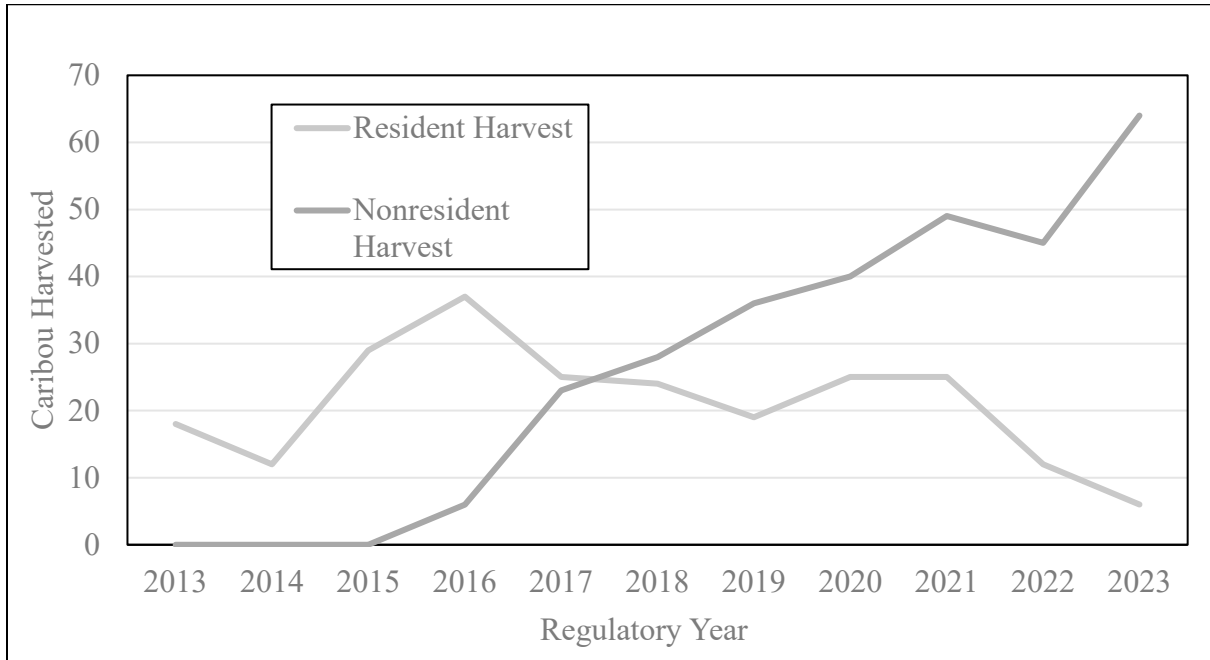


Figure 7.1. Caribou harvested by residents and nonresidents for the Southern Alaska Peninsula caribou herd.

The number of nonresidents that hunted surpassed resident hunter numbers in 2021 and it appears there is a greater interest in hunting this area by nonresidents than residents. Increasing season dates through the fall brown bear season has the potential to allow for additional caribou to be taken which will aid in keeping the herd within objectives.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-072)

PROPOSAL 8

5 AAC 92.990(a)(21). Definitions.

Clarify that hunting feral reindeer in Unit 10, Umnak Island, is allowed under the current caribou hunting regulations as follows:

We are seeking clarification that reindeer hunting is currently allowed on Umnak Island under current regulations. If that is not the Board of Game’s determination, then we are seeking to declare an open season through the deleterious exotic wildlife regulations. The intent is to provide harvest opportunity on the herd, and to develop an economically viable business opportunity for the

Chaluka Corporation. We can provide further input on suggested seasons, bag, and possession limits, etc. We would also recommend that the regulations note the need to respect the land ownership rights of each corporation, and that hunters contact the appropriate corporation to seek permission prior to accessing their land.

What is the issue you would like the board to address and why? Reindeer were introduced to Umnak Island in 1923 for the benefit of island residents. The herd size is now estimated at over 5,000 animals following an aerial survey conducted in 2022.

In reviewing the hunting regulations, it appears the best regulatory comparison is to that of Kodiak Island, where hunting feral reindeer existed with no limits and no closed season until roughly 2008, when the Board of Game adopted a new proposal to implement a hunting season of August 1 – January 31, with a limit of one bull per season. This was done out of a conservation concern. No such Board of Game proposals or regulations exist for Umnak Island.

We are seeking clarification regarding the regulations that should apply to feral reindeer on Umnak, and confirmation that hunting feral reindeer is allowable under current regulations.

Umnak Island is located in the Aleutians about 900 miles from Anchorage. The island is divided into a patchwork quilt of roughly eight landowners, including Chaluka Corporation (Nikolski), the U.S. wildlife refuge, St. George Tanaq Corporation (St. George) and TDX Corporation (St. Paul). There is also a cattle ranch which has operated on leased land, as well as some military land too. The only residents on the island live in Nikolski.

There is a history of reindeer ownership on Umnak Island which pre-dates ANCSA. Our understanding is that sometime after ANCSA in 1971, two Alaska Native Corporations applied for and reportedly acquired ownership of reindeer on the island. However, the herd has since spread throughout the Island and established itself elsewhere, including heavy concentrations of animals on land more than 25 miles away which is owned by the Chaluka Corporation (village corporation with land holding near Nikolski). Local residents, a key landowner (Chaluka Corporation) and tribal leadership have advised that there have been no efforts to manage the herd for at least 25 years.

The herd is now considered a nuisance and a habitat/conservation risk by local residents given its size and the risk of overgrazing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We have developed this proposal with some guidance from the Department of Fish and Game.

PROPOSED BY: Chaluka Corporation (HQ-F24-022)

PROPOSAL 9

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

Lengthen the spring and fall brown bear hunting seasons in Unit 9 as follows:

Reinstate the previous season dates of a 21-day season for both spring a fall hunts on alternating years.

Season dates for even years 2026, 2028.... 5/10-5/31 and odd years 2025, 2027... 10/1-10/21.

This will help alleviate the compressed air travel schedule, allow local residents the opportunity to make more revenue and allow hunters more time to be more selective on the trophy they pursue.

What is the issue you would like the board to address and why? Season length for brown bears in Unit 9. While state website statistics are not complete, however a trend showing an increase of harvest of sows is up. This trend does not show a healthy population trend moving forward. With the shortening of the season more pressure is placed upon hunters that are going for once in a lifetime hunt to fill their tag and are more likely to shoot a legal bear instead of genetically selecting a mature boar that doesn't harm the overall population like a sow does. Since the season change, sow harvest has gone up 11% to 1/3 of the overall take.

An equal however different issue with the short season is the strain and safety issues it creates with an equal number of hunters in a compressed season does on all logistical operations. The number of flights and need for qualified pilots to get personnel, supplies and fuel to one of the most remote areas of Alaska in and out of the field cannot keep up with demand.

Subsequently the revenue generated for these remote villages and business has been impacted as well with only a two-week window for residents that stand to make money to help live in an expensive and logistically challenging portion of our great state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? N/A.

PROPOSED BY: Anthony Marchini (EG-F24-044)

PROPOSAL 10

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

Close Unit 9A to nonresident brown bear hunting as follows:

Close Game Management Subunit 9A to brown bear hunting by nonresidents (currently designated as registration permit hunts RB368 and RB370).

What is the issue you would like the board to address and why? The brown bear population in the small portion of Unit 9A open to hunting is under likely significant hunting pressure. The

Unit 9A hunting season should be closed to nonresidents in all regulatory years, odd and even, to protect that resource while still providing opportunity to residents.

Available ADF&G data on the number of permittees who reported hunting indicates increasing hunting pressure RY2011-RY2017 in Unit 9A, though it is decreasing in Unit 9 as a whole. Contrary to Unit 9 as a whole, Unit 9A reported brown bear kills have been increasing RY2011-RY2017. ADF&G has conducted no Unit 9A brown bear population or density surveys in recent decades.

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 also contrary to Unit 9 as a whole, Unit 9A reported harvest in RY2017 was substantially higher, up 157.5% from the RY2011 reported harvest.

Recent percentages of Unit 9A resident permittees range from 6-15% of the total Unit 9A permittees who reported hunting.

More analysis and information will be provided in proposal commentary if more data and reports are made available by ADF&G. No published summary harvest data is yet available from the fall 2023 hunt and the spring 2024 hunt will occur well after the deadline for these proposals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Wayne Hall (EG-F24-050)

PROPOSAL 11

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

Shorten the spring and fall brown bear hunting seasons in Unit 9C by one week for residents and nonresidents as follows:

I request that the Board of Game shorten the brown bear hunting season by one week (back to its previous length) in both the spring and the fall for Unit 9C, re-establishing the season as October 7–21 and May 10–25 respectively.

Shortening the season allows for the last of the other user groups to exit the popular rivers and lakes where hunting takes place.

In the Department of Fish and Game’s 2022 comments, they wrote that “The department and Board of Game have for decades supported short seasons and reduced bag limits for nonresident and resident hunters in Unit 9 for bear conservation and hunt quality. The management objective for bears in all of Unit 9 is to maintain a high bear density with a sex and age structure that will sustain

a harvest composed of 60% males, with 50 males 8 years or older taken during the combined fall and spring seasons. “

Also, at issue is whether it is ethical to sport hunt animals that are habituated to humans. The bears hunted on Moraine, Funnel and Kulik Rivers are known worldwide. Photographers, film crews and other visitors pay thousands of dollars a day to view and photograph these bears. They are used to the presence of humans: sows will nurse their cubs next to fishermen and wildlife viewers. Many of the bears are known individually by guides and visitors alike. Much of the visiting public is unaware that these bears will be hunted later in the season.

What is the issue you would like the board to address and why? In 2022, the Board of Game adopted a proposal to increase brown bear fall and spring seasons in Unit 19C by one week each, allowing hunters to hunt earlier in the fall and later spring. In the passing of that proposal, the board extended the brown bear seasons to October 1-21 and May 10-31.

In the 35 years I’ve lived in Alaska I have worked as a resource manager for three different land management agencies, including Alaska State Parks. For 16 of those years, I was a law enforcement officer; part of my job was dealing with user conflicts, human-wildlife conflicts, enforcing Alaska game regulations and public safety. What I observed with this early season hunt was the potential for major user conflicts and public safety issues.

- **User conflicts-** Several operators were still dropping off sport fisherman and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitat where bears were fishing, forcing other users to avoid these areas.
- **Public Safety-** Bears were being shot right at the outlet of the Kulik River. The Kulik Lodge still has employees breaking down camp, there were several groups of sport fisherman on the river as well as wildlife viewers. A bear had cached a hunter shot carcass right at the outlet of the Kulik River where aircraft picked up sportfisherman and other visitors.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed addressing this early season hunt with other guides and businesses that use this area for sport fishing and bear viewing. I am a member of Katmai Service providers.

PROPOSED BY: Jennifer Culbertson (EG-F24-061)

PROPOSAL 12

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

Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents as follows:

Units 9D and 9E: Both residents and nonresidents, October 1-21: 1 bear every four regulatory years by registration permit RB368

What is the issue you would like the board to address and why? The shortened fall season for brown bear for nonresidents in Units 9D & 9E. Several years ago, due to guide conflict in Unit 9B and 9C, a proposal was passed to limit the harvest of bears in those subunits due to user conflict and perceived abuse of the resource. Units 9D and 9E were not at all affected by this user conflict and issue. However, the proposal was passed to shorten the seasons for all of Unit 9 from October 1-21 to October 7-21. This cut the first six days of the season and shortened it from 21 days to 15 days. The first six days of October are much better weather and more favorable hunting conditions for large mature boars than the end of the season. Additionally, the weather in Units 9D and 9E can be downright terrible later in October and make it difficult to hunt and even more difficult for outfitters to operate safely, and even more difficult to get home at the end of the season.

Then last year, those same "upper" Unit 9 subunits that had the issues that caused the shortening of the season, successfully proposed to extend their seasons. Unit 9A and 9C to October 1-21 and Unit 9B September 20-21, while Units 9D and 9E were left unchanged at our October 7 start date. Consultation with the Unit 9 biologist in King Salmon confirmed the bear population in Units 9D and 9E is healthy and consistent with the other subunits. Also confirmed the harvest statistics are similar in all Unit 9 subunits for ratio of male/female harvest. This indicates that there is no statistical evidence to suggest a limited season for these two subunits when the other subunits have a longer season.

A shift in the season dates would not increase the number of hunters in the field. It will simply increase hunter experience and harvest of mature boars, which is already determined to be a sustainable practice. It will also be adding additional safety factor for operators that is more aligned with other subunits and the current weather patterns.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? In coordination with other outfitters in Units 9D and 9E as well as consultation and insight from the Unit 9 biologist.

PROPOSED BY: Jordan Wallace and Dave Leonard (EG-F24-049)

PROPOSAL 13

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

Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents, and lengthen the nonresident spring season as follows:

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

Units 9D and 9E

One bear every four regulatory years by permit available online at <http://hunt.alaska.gov> and in person in King Salmon beginning July 5, RB368, both residents and nonresidents, **October 1 - October 21** [OCT 7- OCT 21].

One bear every four regulatory years by permit available online at <http://hunt.alaska.gov> and in person in King Salmon beginning April 2, RB370, residents, May 10 - May 31. Nonresidents, **May 10 - May 31** [MAY 10 - MAY 25].

What is the issue you would like the board to address and why? Hunting seasons and bag limits for brown bear.

I recommend restoring the brown bear seasons to what they were prior to 2018 when they were shortened. At the 2018 Dillingham meeting, the seasons were shortened by six days each, spring and fall. They are presently May 10 - May 25th for nonresidents for the even years, and October 7th to October 21st for residents and nonresidents in the odd years. The winter of 2011-12 was devastating to the brown bears in these Units. During this winter, in my estimation, we lost 50 to 75% of our young bears and sows; the older boars seemed to have made it through the winter in good shape. This was reflected in the skull size of harvested bears. The season was shortened to reduce the harvest of sows until the population had recovered. It has been 12 years, and we are seeing many more sows with cubs and young bears these days. I believe they have recovered enough to restore these seasons back to their prior lengths.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I spoke with some other guides who guide in these areas and they were in agreement.

PROPOSED BY: Dan Montgomery (EG-F24-023)

PROPOSAL 14

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

Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents as follows:

Change the brown bear season in Units 9E and 9D to October 1st to Oct 21st of odd number years for residents and nonresidents.

What is the issue you would like the board to address and why? The start brown bear season in Unit 9 was changed from October 1st to October 7th of odd numbered years a few years ago. I would like for the season to start on October 1st again. The bear population is doing great with a diverse age class of bears. There was concern after the late winter/spring of 2012 that some sows and cubs were lost. The population has rebounded, and we are seeing a very diverse age class of bears.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: David Byrd

(EG-F24-028)

PROPOSAL 15

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

Lengthen the nonresident, spring brown bear hunting seasons in Units 9D and 9E as follows:

Units 9D and 9E. Nonresident season May 10-31. One bear every four regulatory years by registration permit, RB370.

What is the issue you would like the board to address and why? The shortened spring season for brown bear for nonresidents in Units 9D and 9E. Several years ago, due to guide conflict in Unit 9B and 9C, a proposal was passed to limit the harvest of bears in those subunits due to user conflict and perceived abuse of the resource. Units 9D and 9E were not at all affected by this user conflict and issue. However, the proposal was passed to shorten the seasons for all of Unit 9 from May 10-31 to May 10-25. This cut the last six days of the season and shortened it from 22 days to 16 days. This drastically cut valuable hunting time away from nonresident hunters and placed undue stress and demand on the outfitters to conduct the hunts in a shorter amount of time. Any weather delay or bad winds, which are increasingly common, cuts precious days off a hunters' time. Additionally, the last week of May can be an excellent time for harvesting large mature boars and the weather is getting better and safer to operate. Furthermore, any chance of a "late spring" where bear activity is less early on due to larger snow years and other factors, causes the last week of May to be even more valuable for hunter harvest and success of large mature boars. Then last year, those same units 9B and C that had the issues that caused the shortening of the season, successfully proposed to extend the season back to May 10-31, but Units 9D and 9E were left unchanged at our 16 days.

Consultation with the Unit 9 biologist in King Salmon confirmed the bear population in Unit 9D and 9E is healthy and consistent with the other subunits. Also confirmed the harvest statistics are similar in all Unit 9 subunits for ratio of male/female harvest. This indicates that there is no statistical evidence to suggest a limited season for these two subunits when the other subunits have a longer season.

A longer season would not increase the number of hunters in the field. It will simply increase hunter experience and harvest of mature boars, which is already determined to be a sustainable practice. It will also be adding additional safety factors for operators.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? In coordination with outfitters in Units 9D and 9E. as well as consultation and insight from the Unit 9 biologists.

PROPOSED BY: Jordan Wallace and Dave Leonard

(EG-F24-048)

PROPOSAL 16

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

Lengthen the fall brown bear hunting seasons for in Units 9D and 9E for residents and nonresidents as follows:

5 AAC 85.020(18) Unit 9D and 9E Brown/Grizzly Bear.

Brown/Grizzly Bear for both residents and nonresidents in Unit 9D and 9E.

One bear every 4 regulatory years by permit available online at <http://hunt.alaska.gov> and in person in King Salmon beginning July 5.

Open Season: **October 1** [October 7] – October 21.

If nothing is done, the brown/grizzly bear hunting opportunity in Unit 9D and 9E will continue to be underutilized with only a 14-day season.

What is the issue you would like the board to address and why? Lengthen the registration RB368 fall hunting season for brown/grizzly bears in Units 9D and 9E to October 1-21. This would then align all of Units 9A, C, D and E RB368 registration hunts. Currently the season is October 7 – 21 in Units 9D and 9E and October 1-21 in Units 9A and C.

I believe the intent of shortening the season last cycle was to lessen the overall harvest of brown bears. Currently, there is no shortage of brown bears in Units 9D and E. The brown bear population appears to be healthy and on the rise with a diverse age class of brown bears. On a side note, having the season start earlier will thus create a safer hunting experience. Throughout the fall the days get shorter, and the weather patterns worsen. Hunters going afield or returning are constantly negotiating a travel window and that window gets smaller every day throughout the October season. Allowing hunters into the field a week earlier will facilitate the daylight and weather window easier.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Spencer Pape (EG-F24-057)

PROPOSAL 17

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

Lengthen the spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents as follows:

Change the brown bear hunting seasons in Unit 9E, for both resident and nonresident hunters, (RB368) and (RB370). Lengthen the bear season to mirror Units 9A & C.

Unit 9E (RB 368) brown bear season date: **Oct. 1 - Oct. 21**, [Oct. 7 to Oct. 21] odd number years.

(RB 370) brown bear season date: **May 10 - May 31**, [May 10- May 25] even number years.

What is the issue you would like the board to address and why? Change the brown bear hunting seasons in Unit 9E, for both **resident and nonresident hunters**, (RB 368) and (RB370). Lengthen the bear season to mirror Units 9A and C.

The brown bear population in Unit 9E has been increasing for the last eight - ten years. Sows are routinely birthing three - four cubs, per litter, (personal observation).

The Alaska Department of Fish and Game’s plan, to help the population of the Northern Alaska Peninsula grow, is as follows:

5 AAC 92.111. Intensive Management Plans I. Northern Alaska Peninsula (NAP) Caribou Herd Intensive Management Plan, in unit 9(C) and 9(E)

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

(D) the brown bear population objectives 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 season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have been guiding hunters every year on the Alaska Peninsula since 1978. I spend an average of 120 days per year in Unit 9E, guiding hunters and fisherman.

PROPOSED BY: Tracy Vrem (EG-F24-068)

PROPOSAL 18

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

Shorten the spring and fall brown bear hunting seasons in Unit 9C for residents and nonresidents, and convert to drawing permits hunts as follows:

Unit 9C: Restore brown bear hunting season to October 7-21 (from October 1-21) and May 10- 25 (from May 10-31), and establish 1 bear every four years *by drawing permit only*.

ISSUE: The current regulation for Unit 9C establishes an October 1 to October 21 (odd years only) and May 10 - May 31 (even year only) season for brown bear hunting. Part of Unit 9C includes Katmai National Preserve and the Funnel, Moraine, and Battle Creek drainages. While hunting is permitted within national preserves under the Alaska National Interest Lands Conservation Act (ANILCA) of 1980, the act also directed that the National Park Service provide for "high concentrations of brown/grizzly bears and their denning areas" in Katmai National Park and Preserve. Bear viewing guides in this area have reported a decline in the number of bears, most notably trophy class mature males, observed by their clients.

While there may be multiple factors causing the viewable number of bears to decline, we don't know for sure the full range of the causes. Recent population data and harvest analysis has not been provided by the National Park Service or ADF&G to support the extended hunting season in Unit 9C, Uniform Coding Units (UCU) 702 and 703.

My concern is the high probability that too many Katmai Preserve bears are being harvested to meet the congressional mandate in ANILCA of providing for "high concentrations" of brown bears. In addition, the impact of this harvest on the age distribution, as well as the overall populations numbers, is at odds with the National Park Organic Act and with direction in Chapter Four of the National Park Management Policies that, in part, directs the Park Service to "strive to understand, maintain, restore and protect the inherent integrity of the natural resources...". To support a sustainable bear harvest in Unit 9C that also meets the Park Service mandate, a reliable study needs to be done on bear populations, including age classes.

The National Park Service and the State of Alaska need to collaborate to determine what level of harvest can occur in Katmai Preserve and still meet the federal mandate of "high concentrations" of brown bears. Once a harvest level is determined, we request that the department adopt a draw hunt to ensure that only a sustainable harvest is taken each year.

Will the quality of the resources harvested or the products produced be improved? It improves the quality of the bear viewing resource by reducing the overharvest of brown bears. This will also, eventually, improve the quality of the hunting in this area as only a few bears will be harvested each year and those bears will undoubtedly be trophy sized.

Who is likely to benefit? The bear population will increase, particularly large mature males. The National Park Service will benefit from being able to meet its congressional mandate. The State of Alaska will benefit by being seen as partnering with the federal government on how to sustain a hunt in an area with a specific population directive from Congress. Those hunters that are eventually allowed back into this area will benefit from trophy size bears. Visitors and residents alike will benefit by the return to historic brown bear population numbers giving unsurpassed brown bear viewing experiences found nowhere else in the world. The opportunity to view bears will continue to be an economic benefit to gateway communities on the Kenai Peninsula, Anchorage, and Kodiak.

Who is likely to suffer? A small number of hunters will not be able to hunt bears in this area. There is some economic loss from air transport and guide services.

Other solutions considered? Restore hunting season to October 7-21 and May 10-25, and establish drawing permit for that portion of Unit 9C in Katmai Preserve; namely, UCU 702 and UCU 703.

What will happen if nothing is done? There will continue to be harvested levels of brown bears that conflict with the National Park Organic Act and other federal laws, including the mandate found in ANILCA to provide for "high concentrations" of brown bears. Not only will this

continued violation of federal law exacerbate state/federal tensions over jurisdiction, but continued hunting without reliable population data will contribute to the depletion of brown bears in Katmai National Park and Preserve. Observations by bear viewing operators in the immediate area in Katmai Preserve have recently noted a decline in number of large mature male bears.

At risk here is one of the world's premier brown bear viewing areas. Because of the lack of vegetation, this area provides a unique opportunity to observe brown bears in their natural habitat. These bears become habituated to human observation and the result is bear viewing unlike anywhere else in the world. This is exemplified by the volume of people that utilize bear viewing guides each summer and pay significant money to observe these bears. The close proximity of these bears to Alaska's major population centers have created a unique bear viewing opportunity that provides jobs and a good source of income to bear viewing guides living on the Kenai Peninsula, King Salmon, and Kodiak.

A study by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in Southcentral Alaska, stated that bear viewing related service providers (air/boat taxis, guides, lodging) reported \$34.5 million in sales in 2017 and that bear viewing service providers paid approximately \$10 million in direct wages and benefits and hired 371 employees in 2017. Direct spending by service providers and households contributes approximately \$19 million in value added to the regional economy. This sustainable economic activity is at risk, as well as the educational and inspirational opportunities provided by this unique bear viewing experience.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No Advisory Committee or others were involved.

PROPOSED BY: David Bachrach (EG-F24-091)

PROPOSAL 19

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10 as follows:

Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10. Establishing a hunting season will prevent Pribilof foxes from being hunted during their breeding season. The rationale behind suggesting a bag limit only for nonresidents is to avoid undue hardship for residents living on the Pribilof Islands who may seek to harvest foxes as a means of livelihood. (The majority of nonresident hunters to the Pribilofs are believed to be from out of state.)

Suggested draft regulatory language:

Hunting Regulations – Fur Animals
Arctic fox: Unit 10, **Pribilof Islands located in a portion of Unit 10,**

RESIDENT HUNTERS: No Limit, open season Nov 10 – Feb 28 [NO CLOSED SEASON].

NONRESIDENT HUNTERS: Two foxes [NO LIMIT], **open season Nov 10 – Feb 28** [NO CLOSED SEASON].

This establishes an open season that does not overlap the fox breeding season, and is similar to the two fox bag limit for Arctic fox hunting in other units.

What is the issue you would like the board to address and why? Unit 10 includes the Pribilof Islands in the Bering Sea, in addition to the western and central Aleutian Islands from Attu Island to Unimak Island.

The Alaska Department of Fish and Game (2015) identifies the Arctic fox, *Vulpes lagopus*, as a Stewardship Species, a Sentinel Species, and a Species of Greatest Conservation Need (SGCN). Arctic fox on the Pribilof Islands, i.e., Pribilof foxes, are further recognized as an endemic subspecies, *Vulpes lagopus pribilofensis* (Angerbjörn et al. 2004; Norén et al. 2023) and are the islands' only terrestrial carnivore. There are no red fox (*V. vulpes*) on the Pribilof Islands.

Foxes (arctic and red) were historically introduced onto many Aleutian Islands (Bailey 1993) in Unit 10. Subsequently, introduced foxes have been successfully eradicated from many Aleutian Islands in Unit 10 through a USFWS removal program (Bailey 1993; Petersen et al. 2015). Possibly influenced by this history of past introductions and eradications of foxes on Aleutian Islands, the Alaska Hunting Regulations (2023-2024, and previous years) stipulate “No Limit” and “No Closed Season” for Arctic fox hunting throughout Unit 10.

Because the Pribilof Islands are designated as being in Unit 10, Pribilof foxes may be legally hunted with no bag limit and no closed season.

Why is this an issue?

On the Pribilof Islands, the lack of bag limits on the hunting of Arctic foxes could result in unsustainable levels of harvest. In particular, having “No Closed Season” allows for Pribilof foxes to be hunted throughout their breeding season. [In addition to hunting, the trapping of Arctic fox is permitted throughout Unit 10, including the Pribilofs, with “No Limit” during the open season.]

Pribilof foxes are part of the Pribilof Islands' native faunal and floral biodiversity (Elliott 1881). Pribilof foxes provide unique photo-tourism viewing opportunities, and serve as a first-line of defense against introduced rodents, i.e., rats, becoming established on the Pribilof Islands.

Pribilof fox populations appear to be in decline (Fig.1)(White 1992, 2017) as a result of reductions in natural food sources e.g., northern fur seals, nesting sea birds. Other factors, including decreasing sea ice (Geffen et al. 2007), exposure to organochlorine contaminants (Bolton et al. 2017), and disease (White 2010; Spraker and White 2016) may be further contributing to the observed decline in Pribilof fox numbers.

Compared to historic population estimates of >250 breeding pairs on each of St. Paul and St. George Islands (Jones 1914; Isto 2012), Pribilof foxes currently exist in low numbers. A

standardized island-wide survey last conducted in July 2023 on St. Paul documented a total of 57 active dens, 34 of which appeared to be natal (although pups were observed at only 26 dens).

What would happen if nothing is changed?

Unlimited hunting, especially during the fox breeding season, is likely to be detrimental to the long-term conservation and survival of endemic Pribilof foxes. As small, genetically-isolated populations, Pribilof foxes are vulnerable to a myriad of natural and anthropogenic threats, as noted above. A combination of factors, including climate change, and future and emergent threats such as increasing risk of disease e.g., avian flu, could drive Pribilof foxes towards extinction.

In the short-term, unlimited harvest reduces opportunities for tourism viewing, and reduces the fox populations' capacity to prevent introduced rodents from becoming established on the Pribilof Islands.

The local St. Paul Island Ecosystem Conservation Office (ECO) informally oversees resident hunting. However, an unknown number of nonresidents who travel to the Pribilof Islands specifically to hunt (primarily sea ducks and reindeer) also harvest Pribilof foxes. The lack of available data on nonresident fox harvest, and the current regulations that allow for "No Closed Season" and "No Limit" on Arctic fox hunting throughout Unit 10, hampers ECO's ability to effectively monitor or conserve the Pribilof Island's natural resources.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. While there are concerns about the lack of monitoring of visiting hunters who harvest local wildlife (Pribilof foxes, sea ducks), overall, the Tribal Council was not in consensus as to whether the proposed changes would address concerns about fox conservation without interfering with local activities e.g., fox hunting, control of "nuisance" animals in town.

The Tribal Council supports the concept of ECO establishing a local monitoring program of all on-island hunting to obtain harvest data that can help inform local conservation programs, similar to ECO's established and successful reindeer hunt monitoring program. However, in the absence of both a monitoring program and any local enforcement authority, the Tribal Council expressed doubt as to how the proposed regulatory changes could be reasonably enforced.

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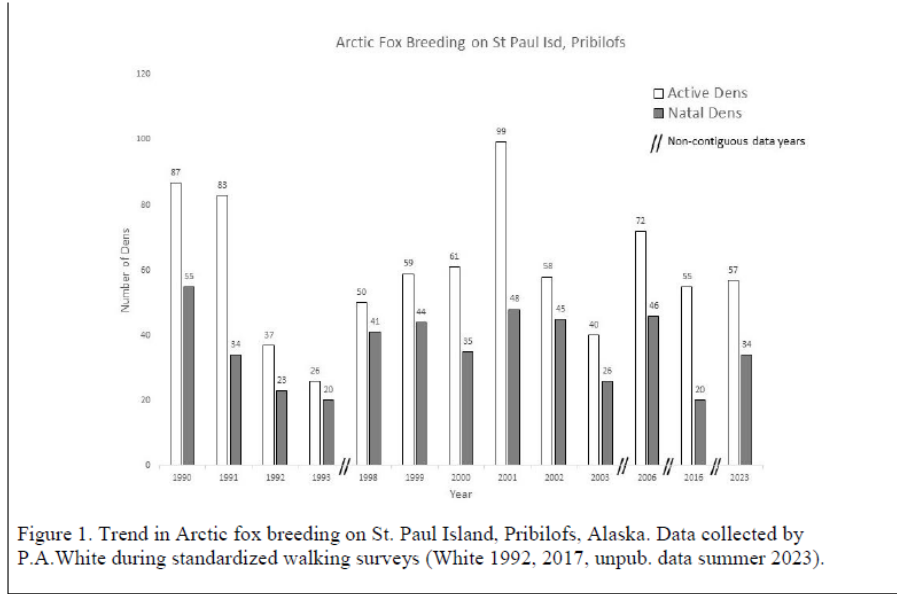
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Continued on next page.



PROPOSED BY: Paula White, PhD

(HQ-F24-034)

PROPOSAL 20

5 AAC 84.270. Furbearer trapping.

Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10 as follows:

Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10. The rationale behind suggesting a bag limit only for nonresidents is to avoid undue hardship for residents living on the Pribilof Islands who may seek to harvest Arctic foxes as a means of livelihood.

There already exists an open season for Arctic fox trapping throughout Unit 10. There are no changes proposed to the existing open season dates. There are no changes proposed for bag limits on resident trapping.

Suggested draft regulatory language:

Trapping Regulations – Central/Southwest Alaska, Units 9-11, 13, 14A, 14B, 16, and 17

Arctic fox: Unit 10, **Pribilof Islands located in a portion of Unit 10**

RESIDENT TRAPPERS: Nov 10 – Feb 28..... No Limit.

NONRESIDENT TRAPPERS: Nov 10 – Feb 28..... **Two foxes** [NO LIMIT].

What is the issue you would like the board to address and why? Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands which are located in a portion of Unit 10 as follows:

NONRESIDENT TRAPPERS: BAG LIMIT 2 FOXES

Unit 10 includes the Pribilof Islands in the Bering Sea, in addition to the western and central Aleutian Islands from Attu Island to Unimak Island.

The Alaska Department of Fish and Game (2015) identifies the Arctic fox, *Vulpes lagopus*, as a Stewardship Species, a Sentinel Species, and a Species of Greatest Conservation Need (SGCN). Arctic fox on the Pribilof Islands, i.e., Pribilof foxes, are further recognized as an endemic subspecies, *Vulpes lagopus pribilofensis* (Angerbjörn et al. 2004; Norén et al. 2023) and are the islands' only terrestrial carnivore. There are no red fox (*V. vulpes*) on the Pribilof Islands.

Foxes (arctic and red) were historically introduced onto many Aleutian Islands (Bailey 1993) in Unit 10. Subsequently, introduced foxes have been successfully eradicated from many Aleutian Islands in Unit 10 through a USFWS removal program (Bailey 1993; Petersen et al. 2015). Possibly influenced by this history of past introductions and eradications of foxes on Aleutian Islands, the Alaska Trapping Regulations (2023-2024, and previous years) stipulate “No Limit” for Arctic fox trapping during the open season (Nov 10 – Feb 29) throughout Unit 10.

Because the Pribilof Islands are designated as being in Unit 10, Pribilof foxes may be legally trapped (including shot) with no bag limit during the open season.

Why is this an issue?

On the Pribilof Islands, the lack of bag limits on the trapping of Arctic foxes could result in unsustainable levels of harvest. [In addition to trapping, the hunting of Arctic fox is currently permitted throughout Unit 10, including the Pribilofs, with “No Limit” and “No Closed Season”.]

Pribilof foxes are part of the Pribilof Islands' native faunal and floral biodiversity (Elliott 1881). Pribilof foxes provide unique photo-tourism viewing opportunities, and serve as a first-line of defense against introduced rodents, i.e., rats, becoming established on the Pribilof Islands.

Pribilof fox populations appear to be in decline (Fig.1)(White 1992, 2017) as a result of reductions in natural food sources e.g., northern fur seals, nesting sea birds. Other factors, including decreasing sea ice (Geffen et al. 2007), exposure to organochlorine contaminants (Bolton et al. 2017), and disease (White 2010; Spraker and White 2016) may be further contributing to the observed decline in Pribilof fox numbers.

Compared to historic population estimates of >250 breeding pairs on each of St. Paul and St. George Islands (Jones 1914; Isto 2012), Pribilof foxes currently exist in low numbers. A standardized island-wide survey last conducted in July 2023 on St. Paul documented a total of 43 active dens, 26 of which were confirmed as natal (one or more surviving pups present).

What would happen if nothing is changed?

Unlimited trapping is likely to be detrimental to the long-term conservation and survival of endemic Pribilof foxes. As small, genetically-isolated populations, Pribilof foxes are vulnerable to a myriad of natural and anthropogenic threats, as noted above. A combination of factors, including climate change, and future and emergent threats such as increasing risk of disease e.g., avian flu, could drive Pribilof foxes towards extinction.

In the short-term, unlimited harvest reduces opportunities for tourism viewing, and reduces the fox populations' capacity to prevent introduced rodents from becoming established on the Pribilof Islands.

The local St. Paul Island Ecosystem Conservation Office (ECO) informally oversees resident trapping. However, an unknown number of nonresidents who travel to the Pribilof Islands specifically to hunt (primarily sea ducks and reindeer) also 'trap' Pribilof foxes (legally by shooting). The lack of data on nonresident fox harvest, and current regulations that allow for "No Limit" on Arctic fox trapping throughout Unit 10, hampers ECO's ability to monitor or effectively conserve the Pribilof Island's natural resources.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. While there are concerns about the lack of monitoring of visiting hunters who harvest local wildlife (Pribilof foxes, sea ducks), including visitors who may legally shoot foxes under a trapping license, overall, the Tribal Council was not in consensus as to whether the proposed changes would address concerns about fox conservation without interfering with local activities e.g., local fox trapping. [The proposed changes do not apply to resident trappers.]

The Tribal Council supports the concept of ECO establishing a local monitoring program of all on-island hunting/trapping to obtain harvest data that can help inform local conservation programs, similar to ECO's established and successful reindeer hunt monitoring program. However, in the absence of both a monitoring program and any local enforcement authority, the Tribal Council expressed doubt as to how the proposed regulatory changes could be reasonably enforced.

(See references provided in corresponding proposal to establish a hunting season and nonresident bag limit.)

PROPOSED BY: Paula White, PhD (HQ-F24-035)

PROPOSAL 21

5 AAC 84.270 Furbearer trapping.

Remove the two per day bag limit for beaver when taken by firearm during April 15–May 31 in Unit 9 as follows:

Species and Units	Open Season	Bag Limit
--------------------------	--------------------	------------------

(1) Beaver

...

Unit 9[, FIREARMS MAY BE USED TO TAKE UP TO 2 BEAVER PER DAY FROM APR. 15–MAY31]

Oct 10–May 31

No limit.

....

What is the issue you would like the board to address and why? Unit 9 currently has no bag limit for beaver under trapping and hunting regulations and no closed season under hunting regulations so having a limit under trapping regulations for beaver taken by firearm is unreasonably more restrictive. Anyone with a hunting license can take an unlimited number of beavers with a firearm during that time period in Unit 9. Beaver populations are healthy and are found in the majority of drainages where there is suitable habitat in Unit 9 and there are no conservation concerns.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-066)

PROPOSAL 22

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

Shorten the season for hunting wolverine in Unit 9 for both residents and nonresidents as follows:

September 1 through **February 28** [March 31].

What is the issue you would like the board to address and why? Shorten the season dates for wolverine hunting in Unit 9.

Wolverine enter the breeding stage during late February and are in full swing by March with activity increasing drastically which makes them easy targets for hunting with a rifle on a snowmachine. Considering they only reproduce two - three kits per year and often fail to reproduce I believe the hunting season should coincide with the closure of trapping on February 28. This would give them the best chance at reproduction.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this solution on my own and from personal experience in the area. I have trapped and hunted in this area for over 35 years and do not see how killing breeding wolverines allows a future in which we will be able to harvest them. Wolverines are now on the endangered species list in the lower 48.

PROPOSED BY: Graham Morrison

(HQ-F24-007)

Note: Game Management Unit 8 is outside the scope of the Central Southwest Region meeting.

PROPOSAL 23

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

Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresident hunters as follows:

Oct. 8 - Jan. 22 NONRESIDENT HUNTERS: 1 goose by drawing permit only; up to **150** [25] permits may be issued in combination with Unit 9, that portion within the Izembek State Game Refuge.

Oct. 16 – **Dec. 16** [Oct. 31] NONRESIDENT HUNTERS: 1 goose by drawing permit only; up to **150** [25] permits may be issued in combination with Units 8, the remainder of Unit 9, and 10 Unit 9, remainder.

Sept. 1 - Dec. 16 NONRESIDENT HUNTERS: 1 goose by drawing permit only; up to **150** [25] permits may be issued in combination with Units 8, that portion of Unit 9 within the Izembek State Game Refuge, and 10.

What is the issue you would like the board to address and why? Emperor goose fall-winter hunting has now been open for seven seasons. Residents may register for one permit to harvest up to a statewide total of 1,000 (liberal) or 500 (restrictive) geese harvested each season. Nonresidents have been allowed to hunt for the past six of those seven years and have been limited to 25 total tags allowed. Resident hunters have harvested fewer than 150 geese each season and participation appears to be declining among resident hunters. Meanwhile, nonresident interest has increased as demonstrated by a 200%+ increase in the numbers of nonresident hunters applying for DO508 permits - from 263 applicants for the 2018 season to 826 applicants for the 2024 season. Harvest data shows that resident hunters are not interested in hunting Emperor Geese - nonresidents are very interested. Nonresident hunts take place in November through January in rural areas and benefit local economies while not taking resource opportunities away from local Alaskans.

Did you develop your proposal in coordination with others, or with your local Fish and game Advisory Committee? No.

PROPOSED BY: Jeff Wasley

(HQ-F24-040)

PROPOSAL 24

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

Close the season for Alaska hares in Units 9 and 17 as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(2)		
Snowshoe and Alaska hares		
...		
Units 9 and 17 Alaska hares [ONLY 1 PER DAY, 4 TOTAL]	<u>No open season</u> [NOV. 1 – JAN. 31]	<u>No open season</u> [NOV. 1 – JAN. 31]

What is the issue you would like the board to address and why? Alaska hare, one of two species of hare found in Alaska, are an endemic species that were once abundant in western coastal areas and their range extended from Cold Bay on the Alaska Peninsula north to Kotzebue on the Baldwin Peninsula (Units 9, 17, 18, 22, and 23). Historical accounts from the 1970’s described a high abundance of Alaska hares often observed in groups ranging from 50-100 individuals. Recent research and anecdotal observations indicate the population is currently at historic lows for this species across their range, including in Units 9 and 17.

In 2018, in response to the sustained low abundance, a department project was initiated to develop survey methods for this elusive species to examine population dynamics and gain insight into Alaska hare movement ecology. Genetic fecal pellet surveys with hundreds of miles of transects were conducted from 2018-2022 in Units 9, 17, 18, 22, and 23 to gain a better understanding of Alaska hare distribution and abundance. Results from this work documented extremely low numbers of individual Alaska hares, especially in areas surveyed in Units 9, 17, and 23. Larger survey efforts in Units 22 and 23 yielded similar results with low abundances or complete absences from historical ranges that were last confirmed to have Alaska hares as recently as 2006.

Specific causes of this apparent decrease in abundance remain unknown. In response to the low abundance of Alaska hares, both the State Board of Game (Unit 9 in 2018; Units 18, 22, 23 in 2020 and Unit 17 in 2022) and the Federal Subsistence Board (Units 9, 17, 18, 22, and 23 in 2022) changed harvest regulations limiting harvest via bag limits, season restrictions, and salvage requirements.

Hunting seasons in Units 9 and 17 should be closed to address the low abundance and conservation concern for Alaska hare. Snowshoe hare hunting would remain open and unchanged in the area. A closed hunting season in the southern Alaska Peninsula may protect localized populations for quicker

recovery and recolonization. It remains unclear if human harvest is one of the factors preventing a recovery of the species but closing the hunting season is the first step in a conservation effort. Considering the extremely low abundances in this area eliminating the hunting season may be necessary to protect vulnerable Alaska hare populations.

There is a positive customary and traditional use finding for Alaska hares in Units 9 and 17. Any take is inconsistent with sustained yield and could jeopardize future harvest opportunity for subsistence and other harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-075)

Dillingham Area – Unit 17

PROPOSAL 25

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

Increase the number of moose drawing permits issued to nonresidents for Unit 17A as follows:

Allow for more nonresident draw tags to be issued. The management plans allows for a maximum of 50 nonresident tags. In 2023 only **six** moose were harvested from 20 tags issued in Unit 17A. With a healthy population that is 50% over the recommended population, allowing for another 30 tags would likely result in less than 10 more moose being harvested.

What is the issue you would like the board to address and why? ADF&G surveys in Unit 17A have identified an estimated 1,200 moose. Eight hundred moose is what the Department of Fish and Game has deemed to be the ideal highest population of moose in that area.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This has been a proposal I have come up with.

PROPOSED BY: Gabriel Davis (EG-FF24-041)

PROPOSAL 26

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

Lengthen the nonresident, fall moose hunt in Unit 17A as follows:

Allow nonresident hunting from September 1-20. The moose surveys have showed 1200 moose in an area that 800 animals was the top to the target range, according to the Togiak National Wildlife Refuge representative.

What is the issue you would like the board to address and why? An eleven-day hunting season in Unit 17A.

Did you develop your proposal with others, or with your local fish and game advisory committee? Developed proposal myself.

PROPOSED BY: Gabriel Davis (EG-F24-043)

PROPOSAL 27

5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(15)		
Unit 17(A)		
Up to 2 moose per regulatory year only as follows:		
RESIDENT HUNTERS:		
1 moose by registration permit only; or	Aug. 25–Sept. 25 (Subsistence hunt only)	
...		
1 antlerless moose by registration permit only;	Jan. 1 – last day of Feb. (Subsistence hunt only)	
....		

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the board. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with the opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The board adopted an antlerless moose hunt in 2013 after hearing many comments from heavily invested groups such as the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, and the Togiak National Wildlife Refuge.

The Unit 17A moose management plan calls for antlerless moose hunting opportunity when the population is above 600 moose and increasing. When the population exceeds 1,200 moose, a bag limit of up to two moose is needed to provide increased opportunity and to reduce moose abundance to protect habitat. Based on the most recent survey in October 2022, the population

estimate was 1,967 ±358 moose. After further analyses, this estimate will be corrected for sightability which will result in a higher population estimate further supporting liberal harvest strategies. The bag limit of two moose and antlerless harvest opportunity provide a mechanism to limit population growth and allow hunters to harvest surplus animals.

The moose population in subunit 17A is over objective and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-063)

PROPOSAL 28

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

Reduce population and harvest objectives for moose in Unit 17B as follows:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 17B	Positive	<u>2,800–3,500</u> [4,900-6,000]	<u>100–250</u> [200-400]
....			

What is the issue you would like the board to address and why? Current population objectives for moose in Unit 17B have never been met and harvest objectives have rarely been met. Robust moose population surveys across the Unit have been conducted by the department six times since 2000 but are challenging to complete due to the distance from Dillingham and poor survey conditions. Unit 17B is split into two survey units, 17B-West comprised of the Tikchik and upper Nushagak River watersheds, and 17B-East comprised of the Mulchatna watershed. Between 2000 and 2009, 17B-West was surveyed three times with an average population estimate of 1,183 (range of 1,137–1,210); 17B-East was surveyed twice with an average population estimate of 1,709 (range 1,466–1,953). Ideally, survey units are completed in consecutive years which occurred in 2000 and 2001 and 2008 and 2009. The combined estimates from 2000 and 2001 resulted in 3,155 moose, and from 2008 and 2009 resulted in an estimated combined 2,603 moose. Neighboring Unit 17C has similar moose habitat quality and quantity (~ 5,450 mi² moose habitat), a defined objective of 0.5 moose/mi² (~5,800 mi²), and a population objective of 2,800–3,500. Unit 17B population estimates from the robust surveys have never been documented within the existing lower population management objective of 4,900, nor the upper objective at 6,000.

Table 28-1. Unit 17B moose population estimates, regulatory year (RY) 2000–2009

Year	17B-West	17B-East	Total Estimate
2000	1,202	-*	
2001	-*	1,953	3,155
2005	1,210	-*	
2008	-*	1,466	
2009	1,137	-*	2,603

*Survey not completed.

The reported annual harvest for Unit 17B over the last 40 years demonstrates that the minimum harvest objective has only been achieved in two independent years. The current harvest objectives for Unit 17B are not attainable due to a lack of resident hunter participation within the subunit and difficult access for nonlocal resident and nonresident hunters. The proposed new harvest objective for Unit 17B is 100–250 moose, which includes the 40-year average harvest of 121 moose, and also reflects the most recent harvest levels.

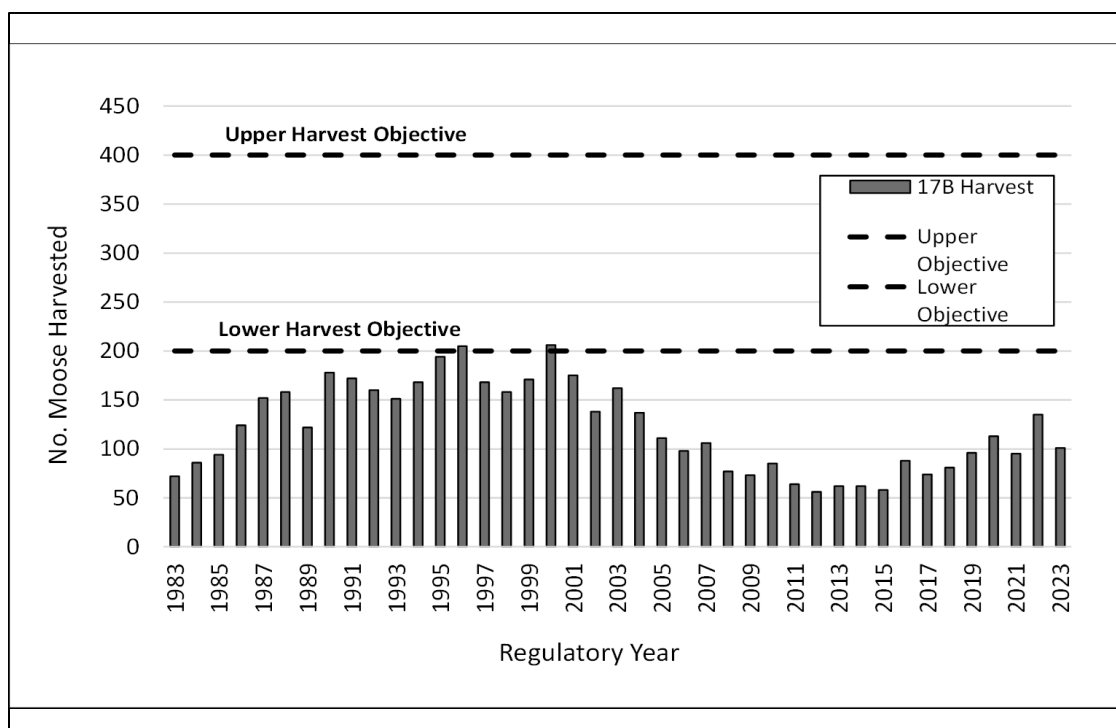


Figure 28-1. Unit 17B moose harvest RY1983–2023

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-077)

PROPOSAL 29

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

Review the population and harvest objectives for the Mulchatna caribou herd as follows:

I recommend establishing new population and harvest objectives after a habitat assessment has been performed to determine the current ecological potential of the range to support caribou. Further, I recommend consideration of recent population and distribution data collected by state and federal Mulchatna caribou herd (MCH) managers that suggest that there are multiple, independent caribou populations within the designated range of the MCH.

Caribou Herds, Population Finding Population Harvest

Adak Negative

Beaver Mountain Negative

Central Arctic Positive 28,000 - 32,000 1,400 - 1,600

Chisana Negative

Delta Negative Denali Negative

Farewell/Big River Negative

Fortymile Positive 50,000 - 100,000 1,000 - 15,000

Galena Mountain Negative

Kenai Lowlands Negative

Kenai Mountains Negative

Killey River, Fox River, and Twin Lakes Negative

Macomb Positive 600 - 800 30 - 50

Mentasta Negative

Mulchatna Positive To be determined [30,000 – 80,000 2,400 – 8,000]

Nelchina Positive 35,000 - 40,000 3,000 - 6,000

Northern Alaska Peninsula Positive 6,000 - 15,000 600 - 1,500

Nushagak Peninsula Negative

Porcupine Positive 100,000 - 150,000 1,500 - 2,000

Rainy Pass Negative

Ray Mountain Negative

Southern Alaska Peninsula Positive 1,500 - 4,000 150 - 200

Sunshine Mountain Negative

Teshkepuk Positive 15,000 - 28,000 900 - 2,800

Tonzona Negative

Unimak Island

Western Arctic Positive at least 200,000 12,000 - 20,000

White Mountain Negative

What is the issue you would like the board to address and why? The Mulchatna caribou herd has changed continuously from the time monitoring began, increasing from an estimated 14,000 in 1974 to 200,000 in 1996, then decreasing to ~12,000 currently. A population objective of 25,000 was initially established in 1987, and since then revised multiple times. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then. The multiple revisions in objectives over time have been a sensible approach to management of a changing resource. I request that the Board of Game review the Intensive Management population and harvest objectives with the goal of adjusting objectives to an ecologically sustainable level. I recommend this review include consideration of habitat quality, which almost certainly has changed in response to caribou grazing, reducing population potential.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed this concept with local federal and state MCH managers but am submitting the proposal individually.

PROPOSED BY: Patrick Walsh (EG-F24-090)

PROPOSAL 30

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

Implement a three-year moratorium on caribou hunting in Units 17 and 19 as follows:

Mulchatna caribou herd implements a three-year moratorium in the following Units: 9B, 17, 19A, and 19B in conjunction with the three-year moratorium in Unit 18.

What is the issue you would like the board to address and why? Due to the continued decline of the Mulchatna caribou herd, all efforts to rebuild the population is vital. Implementing a three-year moratorium on the herd in the following Units: 9B, 17, 19A, and 19B is necessary to ensure that there will be no hunting as "Every Caribou Counts." With active efforts on both state and federal management doing everything we can to ensure that rebuilding the caribou population is vital.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? After submitting a Federal Special Action Request (SAR) to close hunting on the Mulchatna caribou herd. Office of Subsistence management Wildlife Supervisor, Yukon Kuskokwim Delta Regional Advisory Council Coordinator, and I met on 4/11/2024 at 10AM to discuss in depth the SAR. During our discussion it resulted in the following actions that needed to take place. Implement a moratorium on the full range of the Mulchatna caribou herd's migratory areas. This will provide clarity that there is no open hunting season on the full range of the Mulchatna caribou herd. That we civilians, managers, and both state and feds are working together

to rebuild the caribou population. As the herd is still declining in numbers, we want to ensure that hunting remains closed until we meet or exceed the threshold.

PROPOSED BY: Alissa Nadine Rogers (EG-F24-017)

PROPOSAL 31

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

Close the resident caribou season in Units 9B, 17 and 19 as follows.

Units 9B, 19A, 19B, 17A, 17B, 17C: Change the Resident Open Season (Subsistence and General Hunt) from 19: (August 10- September 30) change to (No open season). 17: (August 1- March 31) change to (No open season).

What is the issue you would like the board to address and why? For the security and protection that "Every Caribou Counts" on the Mulchatna caribou herd. The following changes need to be addressed to ensure hunting on the full range of the caribou migratory range continues to be closed until the population numbers have met or exceeded the 30,000 threshold to harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? After submitting a Federal Special Action Request (SAR) to close hunting on the Mulchatna caribou herd. Office of Subsistence Management Wildlife Supervisor, Yukon Kuskokwim Delta Regional Advisory Council Coordinator, and I met on 4/11/2024 at 10AM to discuss in depth the SAR. During our discussion it resulted in the following actions that needed to take place. Change state regulations to open season to No open Season. This will provide clarity that there is no open hunting season on the full range of the Mulchatna caribou herd. That we civilians, managers, and both State & Feds are working together to rebuild the caribou population. As the herd is still declining in numbers, we want to ensure that hunting remains closed until we meet or exceed the threshold.

PROPOSED BY: Alissa Nadine Rogers (EG-F24-016)

PROPOSAL 32

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

Allow the year-round take of brown bear in Unit 17 as follows:

Allow year-round harvest of bears in Unit 17. Legal harvest still requires sealing and reporting of bears but it is far less onerous on the harvester. Less burden on the shooters will encourage more complete reporting and better data for management needs.

Specifically: in Unit 17

Resident Open Season	Nonresident Open Season
---------------------------------	------------------------------------

Units and Bag Limits	(Subsistence and General Hunts)	
(15)		
Unit 17		
2 bears every regulatory year by registration permit only	<u>No closed season</u> [AUG. 20 – MAY 31] (Subsistence only)	No open seasons.
2 bears every regulatory year	<u>No closed season</u> [AUG. 20 – MAY 31]	<u>No closed season</u> [AUG. 20 – MAY 31]

What is the issue you would like the board to address and why? Quite a few bears are shot in the "off season" in Unit 17 and not reported or sealed. Most of these might be considered defense of life and property (DLP) bears. However, people are generally subsistence fishing and conflict between bears and subsistence users prevent individuals from coming into Dillingham during this important season. The DLP process is extremely onerous and inconvenient, especially for those who live outside of hub communities. In other cases, the shooters fear prosecution or investigation and suspicion while just trying to put up fish, and gather food for the rest of the year. Therefore, shot bears are commonly disposed of without contacting ADF&G or wildlife troopers. There is a strong desire in many villages for reduction in bear numbers, especially in close proximity to their communities and subsistence sites. With a number of guides working in the unit, and with the intensive management program in the unit, there is a strong management need for ADF&G to have better bear harvest data.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Partially, I tried to bring up the concept at the recent Nushagak Advisory Committee meeting but since development of proposals was not advertised or on the agenda, I was only allowed to briefly mention my idea. I was advised to submit a proposal and the advisory committee could review once it's in the proposal book. However, I did discuss this with area biologist who helped me with wording.

PROPOSED BY: Dan Dunaway (HQ-F24-032)

Note: The Board of Game can only allow the take of wolf same day airborne under a predator control plan for which a permit is required.

PROPOSAL 33

5 AAC 92.085 Unlawful methods for taking big game.

Allow same day airborne take of brown bear and wolves Unit 17 as follows:

Allow same day airborne hunting of brown bear and wolves Unit 17.

What is the issue you would like the board to address and why? Increased liberalization of bag limits: continually meeting the harvest goals of brown bear annually warrant increased means and methods.

Record salmon returns since 2017 have likely increased bear survival and productivity.

Same day airborne would facilitate increased harvest especially in a predator control zone / area.

No conservation concerns for brown bears relatively minimal harvest primarily by nonresidents.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Dennis Williams (HQ-F24-012)

PROPOSAL 34

5 AAC 92.085 Unlawful methods for taking big game.

Allow the same day airborne take of brown bear in Unit 17 as follows:

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

17 Brown Bear.

Resident Hunters: You may hunt brown bear in Unit 17 from Aug. 20-May 31 the same day you have flown, provided you are at least 300 feet from the airplane.

What is the issue you would like the board to address and why? I'm writing this proposal to ask the board to adopt same day airborne hunting of brown bears for residents in Unit 17. Since 2017 Bristol Bay has seen record high returns of sockeye salmon. One can infer that due to record sockeye returns the Bristol Bay bear population has likely increased with higher productivity and higher survival due to the increased sockeye salmon abundance, the bears primary food resource.

ADFG's Unit 17 Brown Bear Species Management Report states a management objective of at least 50 bears harvested annually, with no more than 50% of the harvest comprising of females. This harvest objective has been met since at least 2011, possibly longer. This means even though harvest methods are being met, Unit 17 still has a significant abundance of brown bears. Harvest is largely driven by guided non-resident hunters, and steps have been taken to liberalize harvest and increase the take of brown bears over the last three Region 4 board cycles.

Very few individuals harvest two bears in a single season. 2022- 6 2021- 5 2020- 2 2019- 3 2018- 3.

Even with the liberalization of harvest, and the sale of hides being legal resident harvest and interest still remains low. Same day airborne is a method in which more residents are likely to participate in, particularly in the spring which really drives harvest rates (two graphs below should

help show this), but fall harvest has been on a generally increasing trend the last five years. Fall harvest in Unit 17 is relatively stable due to a high proportion of moose hunters on guided combination hunts for both bears and moose. Same day airborne is already a method used across the state for other big game species (black bears, 16, deer Statewide).

In the spring of 2023 ADF&G implemented a removal project using fix wing aircraft as well as a helicopter. This costs the state hundreds of thousands of dollars in resources and staffing. Residents would be able to harvest more bears if they were able to hunt them same day airborne and alleviate some of the workload that is put on the state for removing bears in Unit 17.

The use of same day airborne means would likely increase bear harvest within the Greater Mulchatana Predator Control Area, and may help increase both caribou and moose populations due to:

- Eight years of MCH calf mortality study that determined brown bears were the leading cause of caribou calf mortality
- Three-year Unit 17B/C calf mortality study where all 23 mortalities (of 49 collared moose calves) were attributed to brown bear predation.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No, I developed this proposal myself.

PROPOSED BY: Adam Grenda (EG-F24-060)

Note: Trapping wolverine in Game Management Unit 18 is outside the scope of the Central Southwest Region meeting.

PROPOSAL 35

5 AAC 84.270. Furbearer trapping.

Shorten the trapping seasons for wolverine in Units 9 and 17, to the last day of February as follows:

Return the wolverine seasons in Units 9B, 17 and 18 to November 10 - last day in February.

Section 5 AAC 84.270. Furbearer trapping.

Trapping seasons and bag limits for furbearers are as follows:

(14) Wolverine

Units 1 - 5	Nov. 10 - Last day of Feb.	No limit.
Units 6, 7, 9(A), 9(C), 9(D), 9(E), 11, 15, and 16(B)	Nov. 10 - Last day of Feb.	No limit.
Unit 9(B)	Nov. 10 - <u>last day of Feb.</u> [MAR. 31]	No limit.

Unit 10	No open season	
Unit 13	Nov. 10 - Feb. 15	No limit.
Unit 14(A)	Dec. 15 - Jan. 31	2 per season
Units 14(B), 14(C), and 16(A)	Nov. 10 - Jan. 31	2 per season
Units 20(A), 20(B), 20(C) east of the Toklat River, 20(D), 20(F), and 25(C)	Nov. 1 - Last day of Feb.	No limit.
Units 12 and 20(E)	Nov. 1 - Mar. 15	No limit.
Units 17 and 18	Nov. 10 – <u>last day of Feb.</u> [MAR. 31]	No limit.

What is the issue you would like the board to address and why? The trapping season for wolverine in southwest Alaska extends into the denning period in March. If a female wolverine is trapped or shot during March, she may already have kits in the den. Changing this regulation would also maintain consistency across Unit 9 and 17 and 18 with similar habitat, terrain and latitude.

What will happen if nothing is done? Trappers will continue to trap and shoot wolverines into their denning period causing some newborns to die in the den.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This has been a topic of conversation in the area since the wolverine seasons was extended from the end of February to March 31 over 10 years ago. I have received input from other residents and trappers who the killing of female wolverines during the season is this extended trapping season is unethical.

PROPOSED BY: Rick Grant (EG-F24-052)

PROPOSAL 36

5 AAC 85.057 Hunting seasons and bag limits for wolverine.

Shorten the hunting season for wolverine in Unit 17 as follows:

Change the wolverine hunting season in Game Management Unit 17 to September 1 - February 29.

Section 5 AAC 85.057 - Hunting seasons and bag limits for wolverine

(a) In this section the phrase "General hunt only" means that there is a general hunt for residents, but no subsistence hunt during the relevant open season. Hunting seasons and bag limits for wolverine are also as follows: **Resident Open Season (Subsistence and Nonresident Units and Bag Limits General Hunts) Open Season** Units 1 - 5, and 13 Sept. 1 - Feb. 15 Sept. 1 - Feb. 15 (General hunt only) 1 wolverine Units 6 - 9, 12, 15, 16(B), Sept. 1 - Mar. 31 **Sept. 1 - Feb. 29**

Unit 17 1 wolverine, Sept. 1 - Mar. 31 [17, AND] 19 - 25, and 26(A) 1 wolverine Unit 10 No open season. No open season. Units 11, 14, and 16(A) Sept. 1 - Jan. 31 Sept. 1 - Jan. 31 1 wolverine Unit 18 Sept. 1 - Mar. 31 Sept. 1 - Mar. 31 (General hunt only) 2 wolverine Units 26(8) and 26(C) Aug. 20-Mar. 31 Aug. 20-Mar. 31

What is the issue you would like the board to address and why? The hunting season for wolverine in southwest Alaska extends into the denning period. If a female wolverine is hunted and killed during March, she may already have kits in the den.

What will happen if nothing is done? Hunters will continue to be able to shoot wolverines into their denning period causing some newborns to be abandoned and die in the den.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This has been a topic of conversation in the area since the hunting and

trapping season for wolverine were extended from the end of February to March 31, over 10 years ago. I have received input from other residents who agree killing female wolverines during their denning period is unethical.

PROPOSED BY: Rick Grant (EG-F24-086)

PROPOSAL 37

5 AAC 84.270 Furbearer trapping.

Remove the two per day bag limit for beaver when taken by firearm and allow the use of firearm from October 10 – May 31 in Unit 17 as follows:

Species and Units	Open Season	Bag Limit
(1) Beaver		
Unit 17[, FIREARMS OR BOW AND ARROW MAY BE USED TO TAKE BEAVER FROM DEC. 1–APR. 14, AND FIREARMS MAY BE USED TO TAKE UP TO 2 BEAVER PER DAY FROM APR. 15—MAY 31]	Oct 10 – May 31	No limit.

....

What is the issue you would like the board to address and why? Unit 17 currently has no limit for beaver under trapping regulations and no open season under hunting regulations. The current regulation is prohibitive when there is no limit via trapping. Beaver populations are doing well and are found in the majority of drainages where there is suitable habitat in Unit 17. The harvest trend

has been decreasing since its peak in 2005 primarily due to decreased trapper numbers in Bristol Bay, lower demand for fur, decreasing fur prices, and decreased trapper incentive (Figure 37.1).

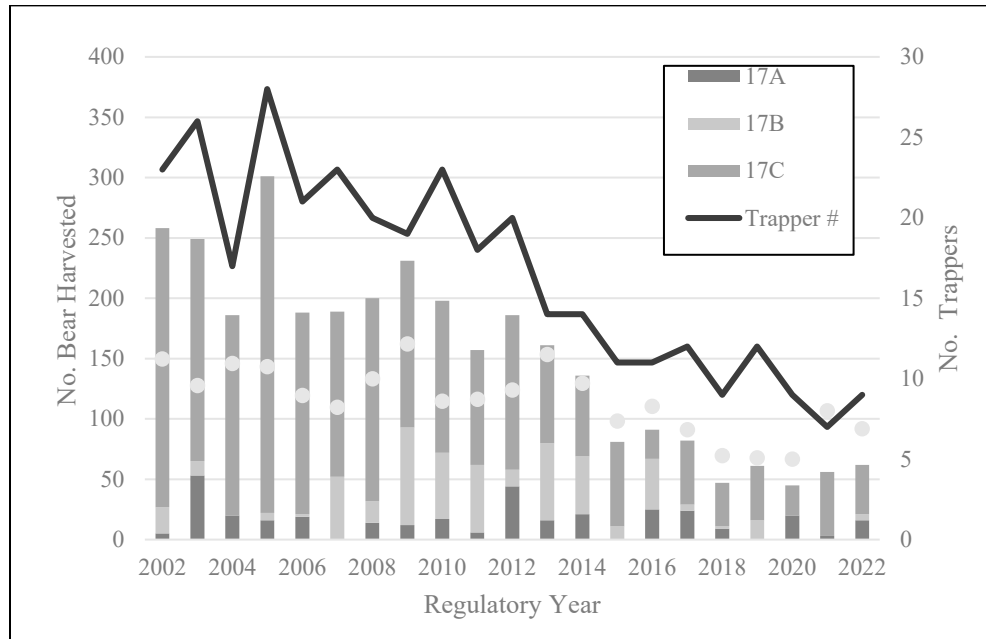


Figure 37-1. Beaver harvest through trapping and hunting in Unit 17, RY2002–2022.

There are currently no conservation concerns for beaver in Unit 17 and allowing increased methods of take and aligning season dates for take with firearm with the trapping season should reduce regulatory confusion, and aid those who subsist on fall beaver for meat and spring beaver for their fur.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-065)

PROPOSAL 38

5 AAC 92.066. Permit for access to Walrus Island State Game Sanctuary.

Lengthen the permit dates to access Walrus Island State Game Sanctuary for hunting as follows.

5 AAC 92.006 (4) an access permit for hunting may be issued under the conditions specified by the department on a case-by-case basis, subject to the application procedures and rules set out in (1) and (2) of this section, to hunting parties for the period of ~~September 10 – October 20~~ **September 5 - October 20** only;

What is the issue you would like the board to address and why? Extend the hunting period from ~~Sept 10th – October 20th~~ to **September 5th – October 20th**.

Background:

A.) Dates were chosen based off how harvesting was done by our ancestors. Now that we have new technology and just about every household has freezers to store their subsistence, preservation is no longer an issue.

B.) Weather is becoming more of a challenge, with climate change, weather patterns are more severe into the Fall season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The proposal was developed by the Qayassiq Walrus Commission working with ADF&G and USF&WS.

PROPOSED BY: Qayassiq Walrus Commission (EG-F24-012)

Glennallen Area – Units 11 & 13

PROPOSAL 39

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

Reduce population and harvest objectives for moose in Unit 13B as follows:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13B	Positive	<u>4,500–5,500</u> [5,300–6,300]	<u>200–400</u> [310–620]
....			

What is the issue you would like the board to address and why? Subunit 13B is included in an active intensive management program to benefit moose in Unit 13. A long history of harvest and population monitoring has demonstrated that moose abundance and harvest have peaked twice since 1967 (Figure 39-1, Figure 39-2).

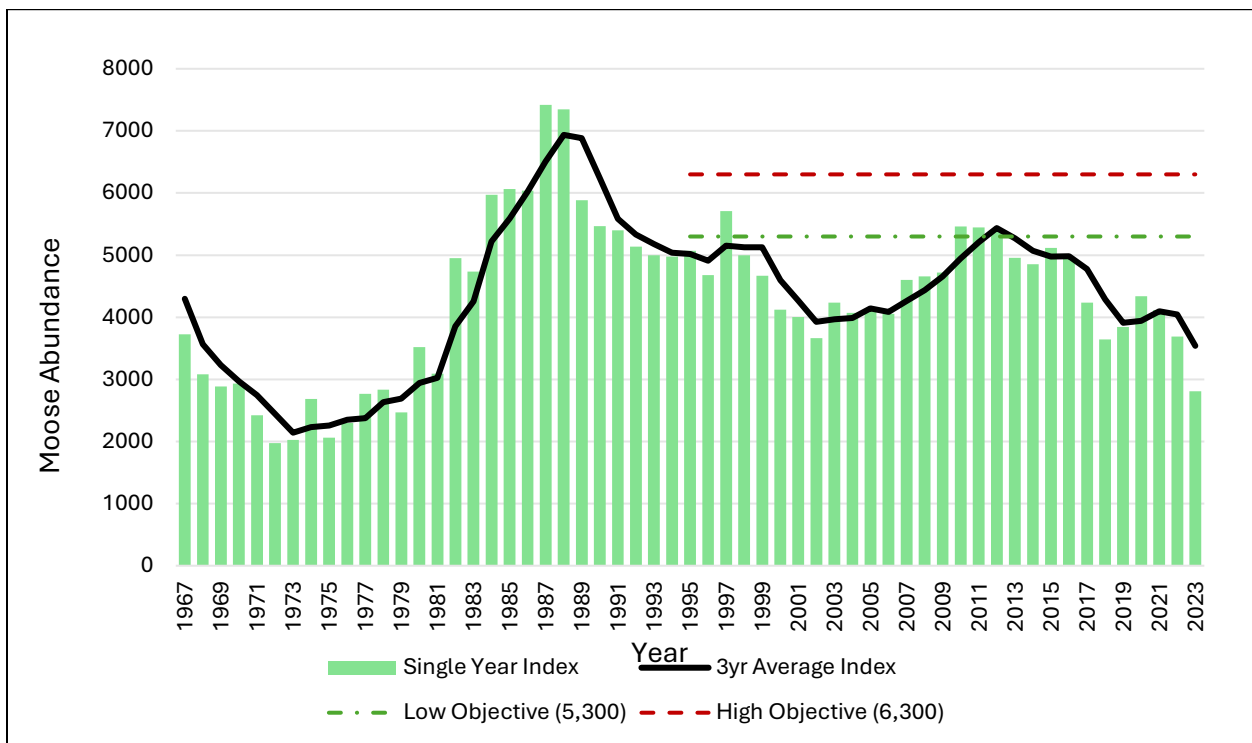


Figure 39-1. Moose abundance index in Unit 13B, RY1967–2023.

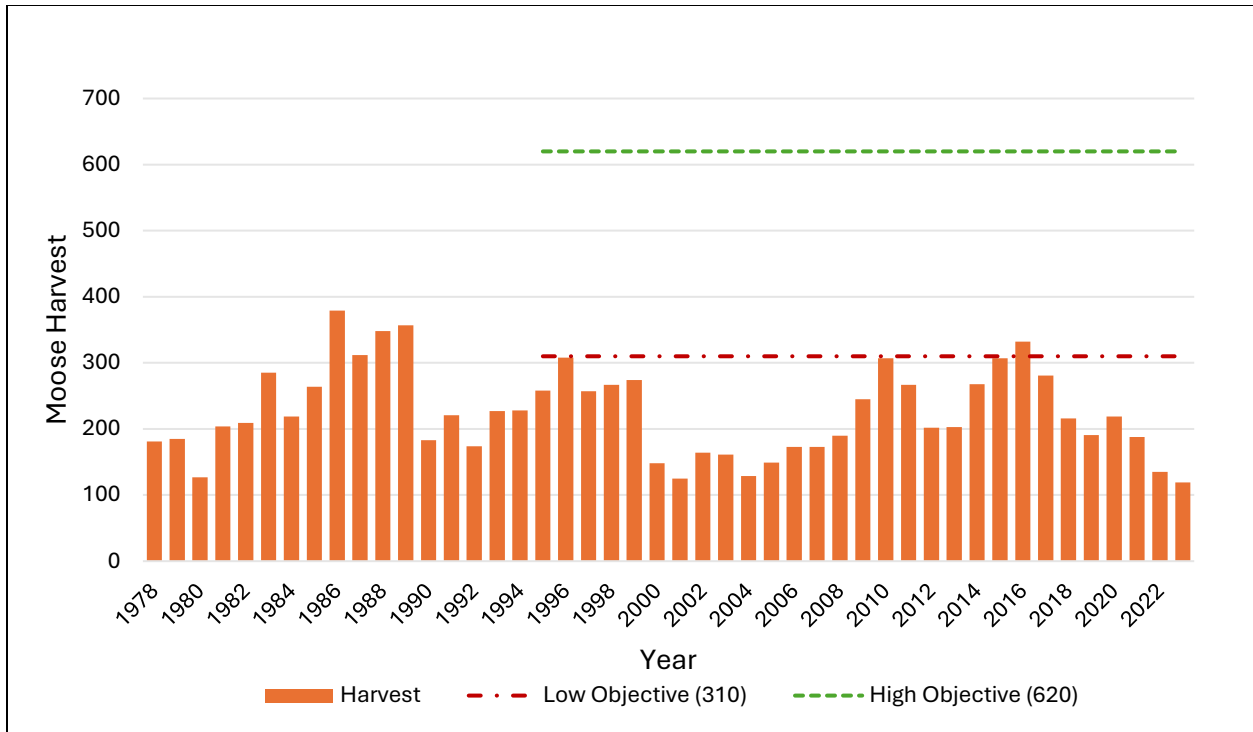


Figure 39-2. Moose harvest in Unit 13B, RY1978–2023.

The department proposes a more biologically appropriate productive and sustainable objective would be an abundance of 4,500–5,500 moose with 200–400 moose for annual harvest, based on historic peaks and valleys for these metrics. This represents a harvest rate of roughly 4.3%–6.8% and includes the long-term average of 225 harvested, with a historic range of 125–379.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-081)

PROPOSAL 40

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

Change the population objective for moose in Unit 13C as follows:

Changing the moose abundance objective in Unit 13C.

What is the issue you would like the board to address and why? The current is 2,000-3,000, and our recommendation is to change it to 2,500-3,250.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes; with the public at our local advisory committee, and the ADF&G staff.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee (HQ-F24-001)

PROPOSAL 41

5 AAC 92.108 Identified big game prey populations and objectives.

Reduce harvest objectives for moose in Unit 13C as follows:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13C	Positive	2,000–3,000	<u>80–200</u> [155–350]
....			

What is the issue you would like the board to address and why? Unit 13C is included in an active intensive management program for moose in Unit 13. A long history of harvest and population monitoring has shown that moose abundance has gone through three peaks since 1967 (Figure 41-1).

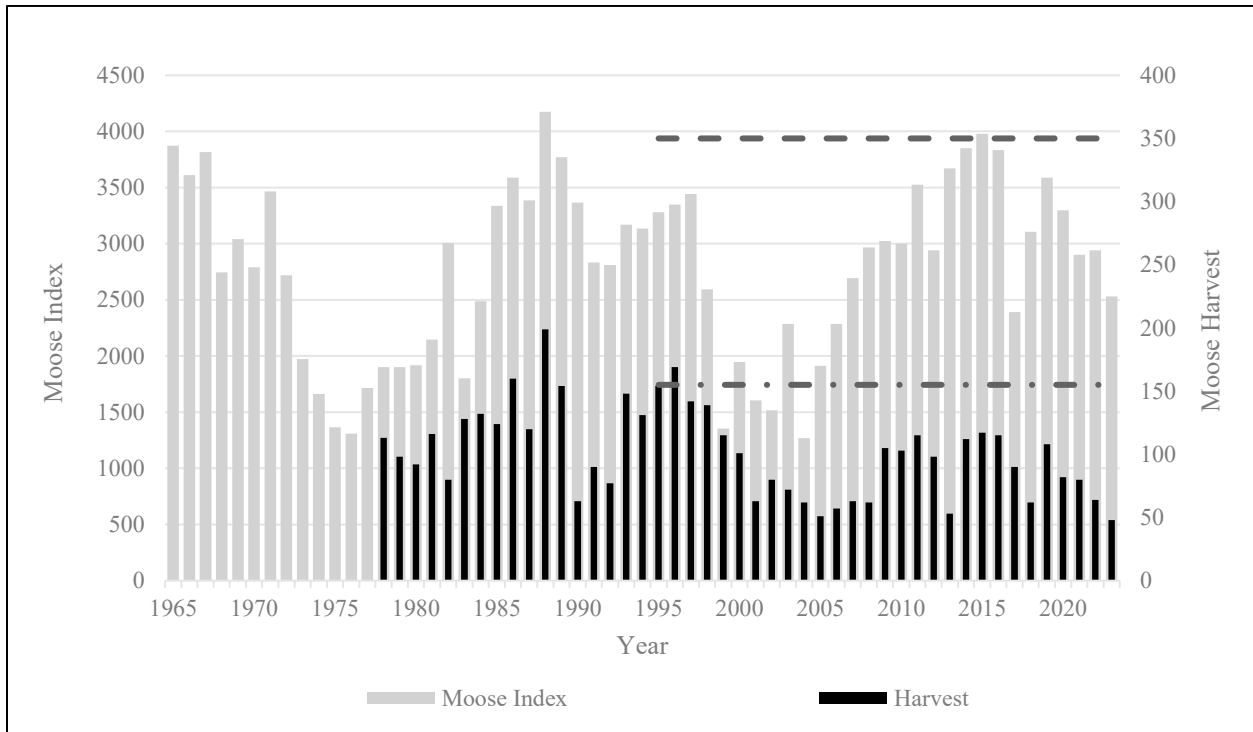


Figure 41-1. Moose abundance index and harvest in Unit13C, RY1965–2023.

Reported harvest numbers are available since 1978, but in those 46 years the minimum harvest objective has only been achieved three single years. The current harvest objectives for Unit 13C are not attainable. Furthermore, the current harvest objectives of 155–350 moose represents roughly 7.2%–10.4% of the current moose population objectives, which is not a sustainable goal. The proposed new harvest objectives for Unit 13C is 80–200 moose, which includes the long-term (approximately 65 year) average of 102 moose and also reflects harvest levels reported in recent years when moose abundance was at a historically more sustainable level. The historic range (1965-2022) of moose harvest in Unit 13C is 51–199. The new harvest objectives would represent a harvest rate of roughly 3.8%–6.3%.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-082)

PROPOSAL 42

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

Reduce harvest objectives for moose in Unit 13E as follows:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13(E)	Positive	5,000–6,000	<u>150–300</u> [300–600]
....			

What is the issue you would like the board to address and why? Unit 13E is included in an active intensive management program to benefit moose in Unit 13. A more than 40-year history of harvest monitoring demonstrates that moose harvest in Unit 13E has peaked twice since 1978 which coincide with peaks in moose abundance (Figure 42-1). The only year in which the lower harvest objective was achieved was in 1988, when 303 moose were harvested. The historic range (1978-2023) of harvest in Unit 13E is 86–303 moose. The current harvest objectives for Unit 13E are not attainable as demonstrated by the harvest history of the herd. The proposed harvest objectives for Unit 13E is 150–300 moose, and is based on the long-term (approx. 45 year) average of 176 moose. These new harvest objectives would represent a roughly 2.9%–4.8% harvest rate, which is reasonable for an area in which cow harvest cannot reliably be obtained due to regulatory frameworks.

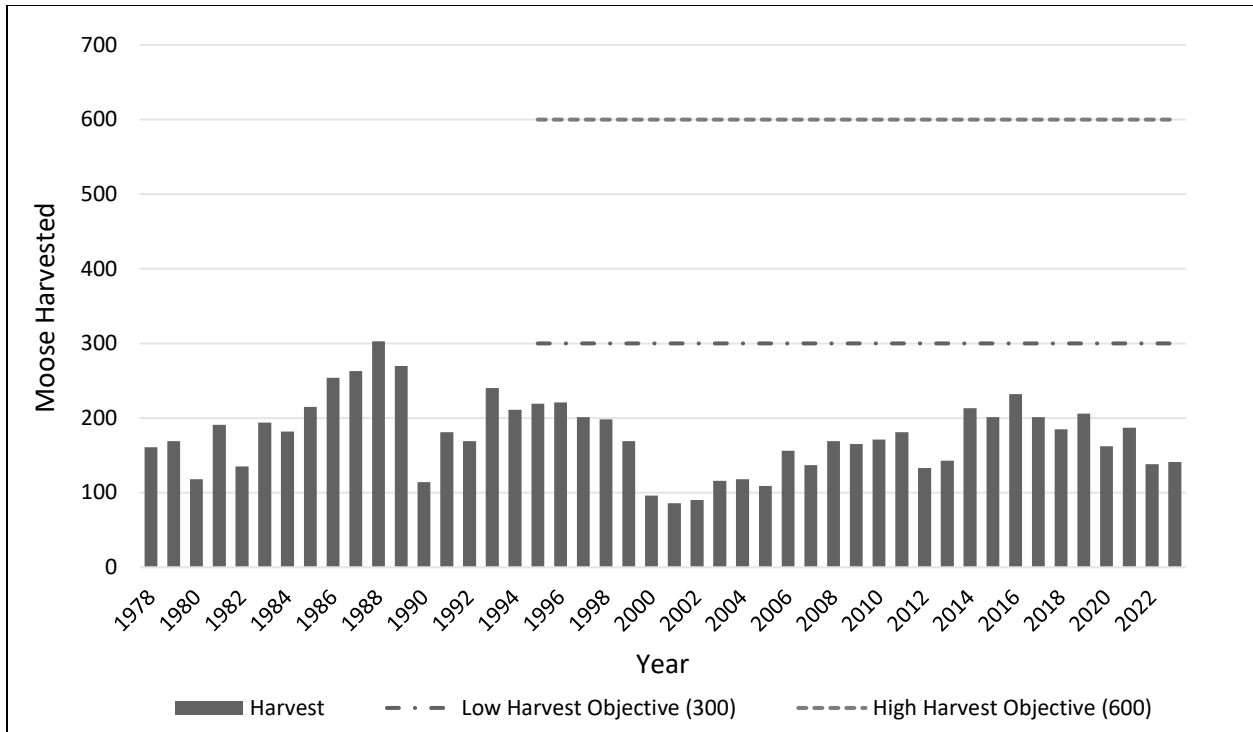


Figure 42-1. Moose harvest and objectives in Unit 13E, RY1978–2023.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-078)

PROPOSAL 43

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

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

Units and Bag Limits (11)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
-------------------------------------	---	------------------------------------

Unit 13
 1 moose per regulatory year,
 only as follows:
 ...

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

Oct. 1–Oct. 31 (General hunt only)

No open season

....

What is the issue you would like the board to address and why? Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities. Unit 13A has a history of successful sustainable cow harvest incorporated into the harvest strategy with relatively high overall productivity and harvest rate for the population since 2012 (Table 43-1). This antlerless hunt opportunity was not reauthorized by local Advisory Committees in 2024 despite moose abundance being within objectives.

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence uses of 300–600 moose. After deliberating a Unit 13 proposal during the 2015 Board of Game meeting, submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit. The hunt area for the antlerless hunt was restricted to the western half of Unit 13A (west of Lake Louise Road), which maintains higher moose densities than the eastern half of Unit 13A.

Table 43-1. Antlerless moose permits and total harvest in Unit 13A, Regulatory Year (RY)12–24.

Regulatory Year	DM325 Permits	DM325 Harvest		Other Harvest ^a		Total Harvest	1% of Estimated Cows in 13A	Estimated Overall Harvest Rate
		Cows	Bulls	Cows	Bulls			
2012	10	4	0	3	230	237	29	5%
2013	10	2	0	1	260	263	30	6%
2014	10	4	3	0	255	262	27	6%
2015	10	7	0	1	333	341	30	7%
2016	10	5	0	3	311	319	28	7%
2017	10	6	2	4	318	330	23	7%
2018	10	7	0	0	246	253	28	6%
2019	10	8	2	0	271	281	27	7%
2020	20	16	0	1	272	289	25	7%

2021	25	22	0	1	264	287	32	7%
2022	25	19	1	3	235	258	24	6%
2023 ^c	20	14	0	5	148	167 ^b	27	4%
2024 ^d	20	-	-	-	-	-	-	-

^a Other harvest includes ceremonial harvest.

^b Moose hunter numbers declined with the closure of caribou seasons in Unit 13 and hunters reported unusually difficult hunting conditions, including stormy weather and late leaf drop.

^c Data has not been finalized for RY23.

^d Permits were announced for RY24 prior to Advisory Committee votes.

The current population objective for Unit 13A is 3,500–4,200 moose with a harvest objective of 210–420 moose, which represents a harvest rate of roughly 5.7%–9%. Moose abundance indices are derived from annual minimum trend counts, which can vary from year to year even when a population is stable (Figure 43-1). To address this variation the 3-year average moose abundance index is typically used to determine subunit status in relation to the midpoint of the population objectives (Figure 43-2). Moose abundance in 13A peaked near historic highs in 2013, 2015, and 2021 and has since declined to more reasonable and productive levels. A combination of intermittent wolf control and cow harvest has recently allowed the 13A moose population to stabilize at a more reasonable level within objectives. The goal is to maintain this stabilization and provide more moose in freezers, which requires cow harvest. Cow moose hunts should be implemented when a population is within objectives, with the goal of stabilizing the population before a population reaches or exceeds the higher objective because of density dependence concerns.

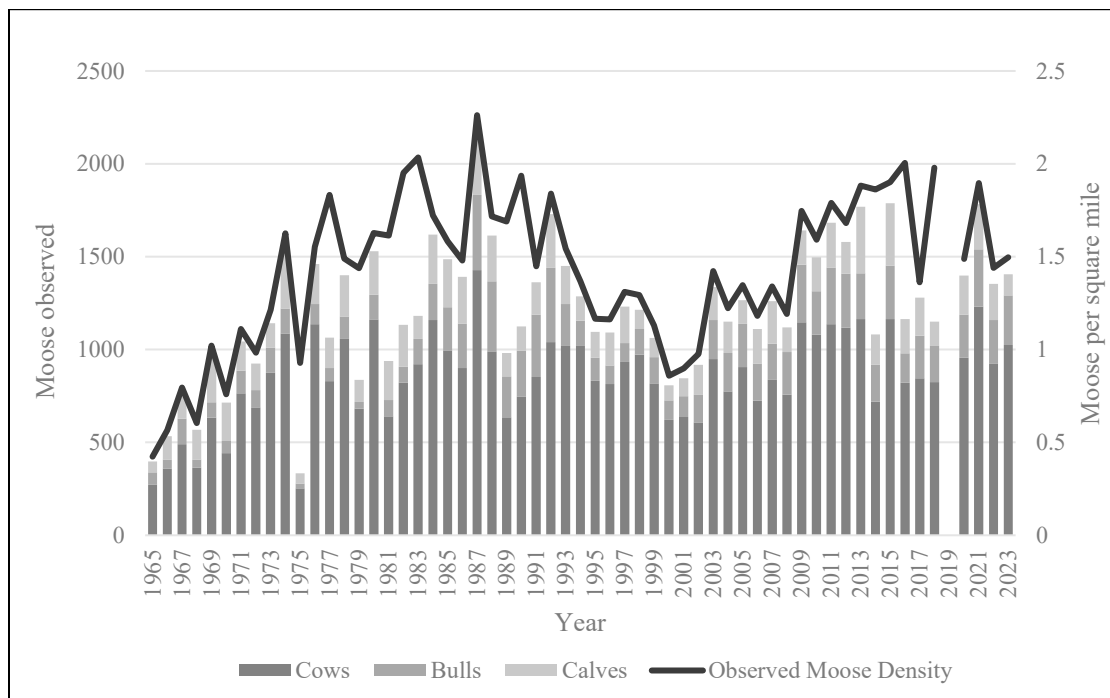


Figure 43-1. Moose minimum counts and observed density in western Unit 13A, RY1965–2023. In 1975, 1977, 1979, 1981–83, 1989–90, 2014, 2016, and 2018 only one out of two count areas were surveyed.

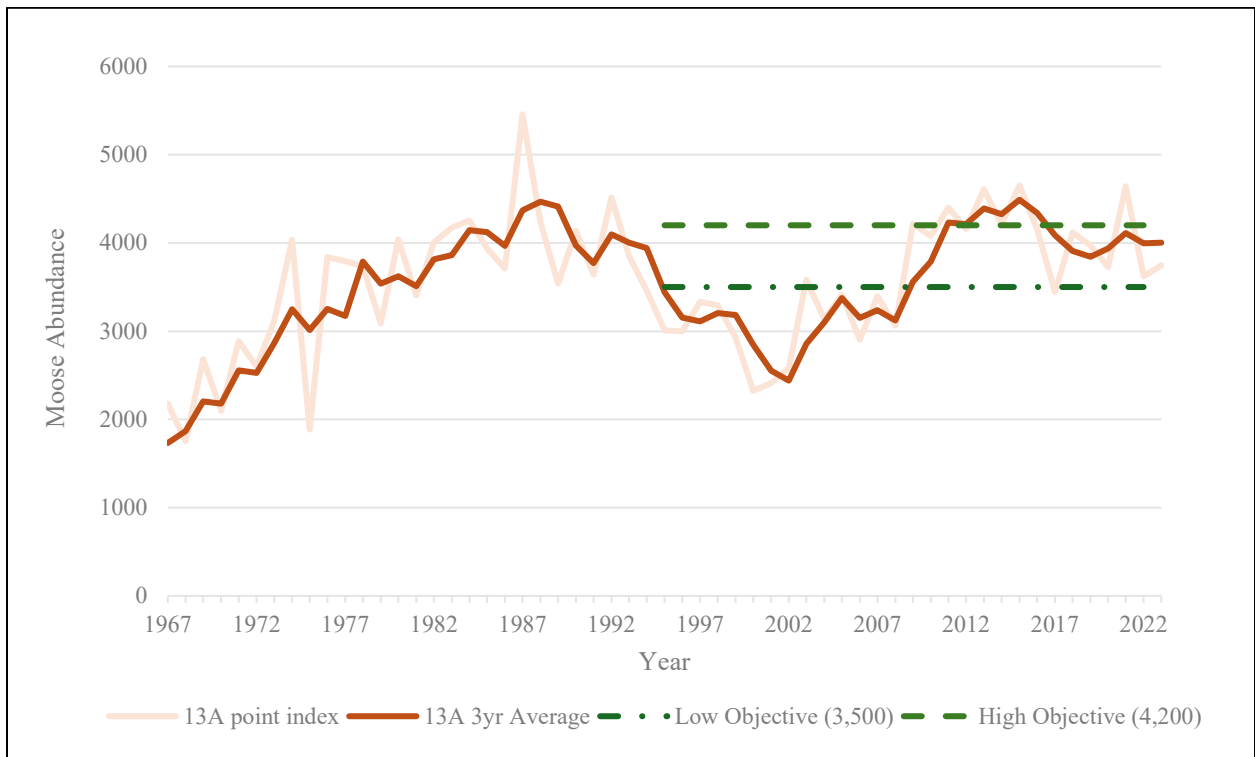


Figure 43-2. Moose population index in Unit 13A, RY1967–2023.

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

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-079)

PROPOSAL 44

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

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
-----------------------------	---	------------------------------------

(11)

Unit 13

1 moose per regulatory year,

only as follows:

...

1 antlerless moose by drawing permit only in Unit 13(C); up to 100 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or

Oct. 1–Oct. 31 (General hunt only)

No open season

....

What is the issue you would like the board to address and why? Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use when populations are doing well requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from reaching or exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities.

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence of 300–600 moose. The current population abundance objective for Unit 13C is 2,000–3,000 moose. Moose minimum counts in Unit 13C were near record highs from 2013 to 2019; that level of abundance has not been seen in Unit 13C since the late 1980s and late 1990s (Figure 44-1). With no cow harvest opportunity, the population peaked with an abundance index of nearly 4,000 moose in 2015, nearly 3,600 moose in 2019, and has since declined to just over 2,500 moose in 2023, suggesting that Unit 13C cannot sustain those high levels of moose abundance over the long-term. The calf-to-cow ratio in Unit 13C has shown a declining trend over the past decade, which suggests the population may have become less productive as it approached or exceeded the carrying capacity of the area. Wolf control has been suspended in Unit 13C since 2019 due to the high numbers of moose and lack of cow harvest opportunity.

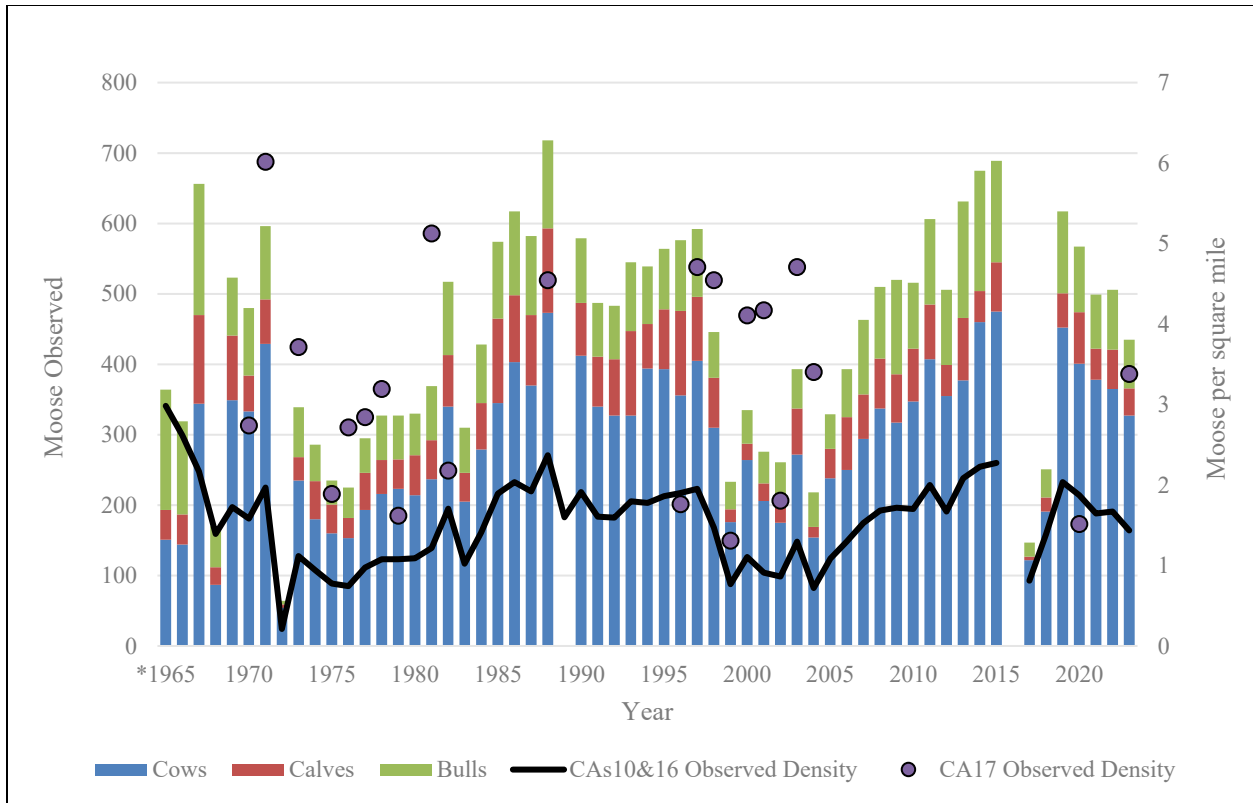


Figure 44-1. Moose minimum counts and observed densities in Unit 13C, RY65–23. In 1965, 1966, 1968, 2017, and 2018 only one count area was completed.

After considering a Unit 13 proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit.

Recent composition surveys indicate that the bull-to-cow ratio has been hovering at or below 25 bulls per 100 cows, (the current objective for Unit 13C) indicating that there are no additional bulls available for harvest. Stabilizing the population within the objectives will allow for a more productive population, producing more bulls as well as cows for an increase in the overall harvestable surplus. Population growth cannot be controlled through bull harvest only. Waiting to implement cow harvest after a population has peaked and beginning to decline is short-sighted and ineffective. The tool needs to be available when a population is growing toward the higher objective with the understanding that hunting permits will not be issued when the population is below the midpoint of the objectives.

If antlerless moose hunting opportunities are not available in Unit 13C, the intensive management program and objectives will likely need to be reduced to maintain the moose population within a

population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-080)

PROPOSAL 45

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

Add a five-day archery only season for hunting moose in Unit 13 as follows:

I would like to see the Board of Game take additional steps to maximize the Unit 13 moose hunting opportunity while preserving the resource.

Add a 5-day archery only season in Unit 13.

"One bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least one side by bow and arrow only" HT, August 27-31.

What is the issue you would like the board to address and why? I am not a fan of regulations that provide certain user groups exclusive access to the detriment of other user groups. I do however support adding weapon restricted seasons in addition to an existing general harvest season, when it can be used to increase the overall number of available days afield without causing a detrimental impact to the resource. Units 14 and 16 already have successfully managed archery only seasons and this would bring Unit 13 more in line with those neighboring units.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No but, by submitting this I hope to get feedback from ADF&G biologists on its viability.

PROPOSED BY: Jon Freeman (HQ-F24-029)

PROPOSAL 46

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

Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions as follows:

Proposed Language:

Alaska residents only:

Unit 13 Moose

August 15-27; Bull (by registration permit only).

When the harvest is projected to reach 100 animals, antler requirements of spike/fork or 50-inch antlers with at least 4 or more brow tines on one side will take immediate effect.

This hunt is closed to the use of motorized transport or pack animals, (except in portions of Unit 13 along the Parks, Denali, Richardson, and Glenn Highways), for hunting moose --- including the transportation of big game hunters, their hunting gear and/or parts of big game.

Hunters must report to the nearest ADF&G office within 24 hours of a successful kill. ADF&G may limit the number of moose to be taken in specific zones; (presently outlined in the Community Hunt guidelines.) Should the 100 bull harvest be obtained, zone requirements may be waived.

Proxy-hunting will be allowed in the August 15-27 hunt.

THIS HUNT IS DESIGNED AS A REPLACEMENT TO THE PRESENT COMMUNITY HUNT not as an additional opportunity.

What is the issue you would like the board to address and why? Replace the community hunt for moose in Unit 13 with a more equitable solution for all hunters. The present community hunt does not achieve the compete with intended purpose of helping local communities compete in the field with urban hunters. Many “communities” are composed of urban hunters who can “out-gun” locals who are not as well-funded. Our proposal levels the field and gives all hunters equal opportunity.

Read this proposal carefully. It does not take away or affect the harvest ticket hunt in Unit 13 which is presently from September 1-20th.

Our proposal is a separate entity that is contingent on [REPLACEMENT OF THE COMMUNITY HUNT] that is presently in place.

A non-motorized hunt levels the field and allows locals a significant advantage in locales that they live and work around throughout the season while not restricting anyone who wishes to hunt.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Developed by Paxson Fish and Game Advisory

PROPOSED BY: Paxson Fish and Game Advisory Committee (HQ-F24-048)

PROPOSAL 47

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

Open a late season archery only drawing permit hunt for any bull moose in Units 13E and 13B, along the Denali Highway as follows:

Create a late season ANY BULL moose drawing permit for ARCHERY ONLY along the Denali highway in Units 13E and 13B.

I would propose the hunt area to be a 5-mile-wide corridor extending on either side of the Denali highway with a season of September 25th to September 30th.

What is the issue you would like the board to address and why? Alaska needs more archery specific hunting opportunities for moose. Unit 13 has some of the best access of any Unit in the state.

A late season archery only hunt for any bull moose along the Denali Highway would not increase harvest drastically but would offer a great opportunity to hunt moose in an uncrowded environment with easy access.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Jessie Dunshie (HQ-F24-015)

PROPOSAL 48

5 AAC 92.121. Intensive Management Plan V.

Modify the intensive management plan for Unit 13 to include Nelchina caribou as follows:

Modify the existing intensive management plan, or create a new intensive management plan to add the Nelchina caribou herd populations; to include cow/calf ratios, population objectives.

We expect the Department of Fish and Game to take into consideration both caribou and moose populations when creating the intensive management plan.

What is the issue you would like the board to address and why? There is not a trigger to implement intensive management to address the declining Nelchina caribou population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, with the public at our local advisory committee.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee (HQ-F24-002)

Note: Game Management Units 12 and 20 are outside the scope of the Central Southwest Region meeting.

PROPOSAL 49

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

Eliminate the harvest of Nelchina caribou as follows:

Close caribou hunting for six years or until the herd reaches the midpoint of the management objective of 37,500. This includes caribou hunting closures in Units 11, 12, 13, 14B, and 20E when Nelchina caribou are present.

What is the issue you would like the board to address and why? Eliminate any incidental take of Nelchina caribou due to the dramatic population decline seen in recent years. With an estimated population of 7,000-8,000 in fall 2023 and a population objective of 35,000-40,000, ensuring no harvest occurs of Nelchina caribou is crucial to rebuilding the herd. We are requesting a six-year hunting moratorium, or hunting closures until the population recovers and reaches the midpoint of the population objective of 37,500. This request is consistent with the March 2023 AITRC recommendation RC081 (see Attachment A).

For the 2023-2024 hunting season, both state and federal harvest of the Nelchina caribou within Unit 13 was closed; with the herd at such a low population estimate and after another heavy snow load, it is expected that winter mortality and calf recruitment will exasperate current population trends. For the herd's future longevity, AITRC asks for a six-year moratorium of the Nelchina caribou or until the herd reaches the midpoint of the population objective of 37,500. In addition, it is crucial that the Board of Game expand closures to all Units Nelchina occupies, or when present, to reduce any incidental take of a herd that has experienced such a rapid decline in recent years. This would include Units 11, 12, 13, 14B, and 20E.

Looking at reports and figures produced by the Alaska Department of Fish and Game in the Nelchina Caribou News 2017 (Figure 1) and Nelchina Caribou News 2023 (Figure 2), it is clear that GPS collared individuals reside within the Units recommended for closure. In addition, it has been observed through GPS collar data and radio tracking in fall 2012-2015 that considerable mixing occurred with Nelchina caribou within Unit 14B. Through the capture effort 22 animals were deployed with GPS collars and through tracking 40% of the caribou traveled into Unit 13E and 13A (Peltier and Brockman 2020).

It is critical that regulations are adopted to ensure the Nelchina caribou herd's additional protection while it is at one of the lowest populations observed in the last 50 years. This will allow the herd the best chance for a speedy recovery, as this herd has significant cultural ties and has been a staple food source for not only Tribal Citizens but many Alaskan residents as well.

Reference Cited:

Peltier, T. C., and C. Brockman. 2020. Caribou management report and plan, Game Management Units 14A and 14B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-11, Juneau.

Note: The figures and attachments provided with this proposal are available on the proposal book website at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? N/A

PROPOSAL 50

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

Change the sheep draw hunt DS165 in Unit 13D to a general season hunt as follows:

I would propose the board eliminate the sheep drawing permit DS165 and return it to harvest ticket regulations. This aligns that portion of 13D with the current management strategy for sheep hunting.

The new regulation would be:

Unit 13D
East of a line along the west
side of Tazlina Glacier, Tazlina
Lake and Mendeltna Creek to
the Richardson Highway

Resident Hunters: HT: One ram with full-curl horn or larger, Aug.10-Sept. 20

What is the issue you would like the board to address and why? The issue is restricted hunting opportunity on sheep hunters and the consistency of the current management strategy.

Hunt DS165 was created in 2008 when that portion of Unit 13D was converted from general harvest regulations for sheep to a drawing permit hunt. DS165 is not being managed for trophy potential or hunt aesthetics (like Tok or Delta drawing permits) and prior to being converted to a draw permit, Unit 13D received hunting pressure consistent with Unit 20A which is currently still utilizing general harvest regulations.

Since there is no biological concern with low density sheep numbers and harvesting rams under the full curl regulation, hunt DS165 goes against the current management strategy and is not necessary for conservation purposes.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? No.

PROPOSAL 51

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

Open a resident only sheep hunt in the Chitina River drainage in Unit 11 as follows.

If adopted, the new regulation would appear under the sheep regulations of Unit 11, on page 71 and read as follows:

The area of Unit 11, North of the Chitina River, west of canyon creek, and south of young creek (MacColl ridge): Nonresident: No open season.

What is the issue you would like the board to address and why? Create a RESIDENT ONLY sheep hunt in the Chitina River drainage, specifically the MacColl Ridge complex. MacColl Ridge is an isolated area within Unit 11 that holds a small population of Dall sheep. Due to its close proximity to a hunting lodge that specializes in sheep hunts, the majority of hunting pressure and harvest of sheep on MacColl Ridge is likely from guided nonresidents. In a time with declining sheep populations but high nonresident demand, there needs to be areas of opportunity for resident hunters to hunt sheep without the added competition and pressure from guided nonresidents. This regulation takes very little opportunity from nonresident hunters, as they can freely hunt the remainder of Unit 11.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was developed solely by myself.

PROPOSED BY: Jessie Dunshie (HQ-F24-010)

PROPOSAL 52

5 AAC 92.530. Management areas.

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

Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only, as follows:

If adopted, the new regulation would appear under the sheep regulations of Unit 11, on page 71 as well as on page 69 as a management area and read as follows:

MacColl Ridge Management Area:

The area of Unit 11 North of the Chitina River, west of Canyon Creek, and south of Young Creek (MacColl Ridge): **Open to sheep hunting by registration permit only.**

RESIDENT SEASON: Aug. 10th to Sept. 20th

NONRESIDENT SEASON: **No open season**

What is the issue you would like the board to address and why? Create a new management area around MacColl Ridge open to sheep hunting by registration permit only, with **no open season for nonresidents.**

MacColl Ridge is an isolated set of mountains in the Chitina River drainage within Unit 11 and holds a small population of Dall sheep. Due to its close proximity to a hunting lodge specializing in sheep hunts, the majority of hunting pressure and harvest of sheep on MacColl Ridge is likely from guided nonresidents. At the present time, sheep populations around Alaska are severely depleted, areas are being shut down further limiting resident opportunity, and non-resident demand for hunts is at an all time high. There needs to be areas that give opportunity and preference to resident sheep hunters to hunt without the added competition and pressure from guided non-residents.

MacColl Ridge is an ideal location for this proposed regulation because: **1)** It's an easily defined landmark and boundary. **2)** It's one of the more accessible areas of unit 11 with ample landing spots to drop hunters. **3)** Takes very little opportunity from non-resident hunters, as they can freely hunt the remainder of Unit 11.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Coordination with other hunters.

PROPOSED BY: Jesse Dunshie (EG-F24-006)

PROPOSAL 53

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

Establish a resident, archery only sheep drawing hunt in Unit 13D as follows:

Create an archery only resident Dall sheep drawing hunt for Unit 13D that includes both Units 13D West and East into one hunt area. Season dates would be October 1-15th and the bag limit would be a full curl ram. It is understood that sheep numbers are down in these areas so the Department of Fish and Game may only want to issue 1-5 tags until populations begin to recover. Archery hunting for full curl rams is very low success < 5% but provides archery hunters the opportunity to hunt without the competition of rifle hunters who can shoot rams at ever increasing distances. As an item of note an additional proposal was submitted in the statewide regulations that would NOT allow the use of aerial scouting during these season dates.

What is the issue you would like the board to address and why? Limited archery only sheep hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-078)

PROPOSAL 54

5 AAC 85.055. Hunting season and bag limits for Dall sheep.

Change the bag limit for the Unit 13D sheep drawing hunts, DS160 and DS260 as follows:

R Unit 13D “west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek” One ram **with a full curl horn or larger, 8 yrs old or two broken tips (broomed)** [ANY RAM] *by permit.*

NR Unit 13D “west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek” One ram **with a full curl horn or larger, 8 yrs old or two broken tips (broomed)** [ANY RAM] *every four regulatory year by permit.*

What is the issue you would like the board to address and why? Currently there are low ram populations in permits DS160 and DS260 area, which includes “west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek”. This needs to align with the rest of Unit 13D’s permit hunts including DS165 and DS265, with a full curl horn or larger, 8 years old or two broken tips (broomed) regulation criteria. This area, “east of a line along the west side of Tazlina Glacier, Tazlina Lake and to Mendeltna Creek to the Richardson Highway”, would then align with the conservation approach of the neighboring permit area as mentioned above. Full curl horn or larger, eight years old or two broken tips (broomed) regulation criteria should be used in areas with low ram populations to secure future healthy ram populations by not harvesting young and immature, non-breeding rams.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed with the coordination of the Matanuska Valley Advisory Committee. Members of the committee were able to share information regarding this hunt area to develop this proposal.

PROPOSED BY: Herb Mansavage and Dan Montgomery (HQ-F24-037)

PROPOSAL 55

5 AAC 85.040. Hunting season and bag limits for goat.

Divide the goat drawing permit hunt DG720 into three separate permit hunts as follows:

I would propose the DG720 permit be split up into three different permits with smaller hunt areas and separate quotas. The new structure could look as follows:

DG720 = Area east of the Richardson hwy to include the Tonsina Controlled Use Area,

DGXXX = Unit 13D west of the Richardson hwy to east side of Tazlina Glacier, and

DGXXX = Unit 13D Tazlina Glacier west to Coal Creek drainage (remainder of current DG720 area).

What is the issue you would like the board to address and why? DG720 receives about 2,000 applications per year but only eight permits were issued for 2024. With such a large hunt area, it should be able support a harvest of more than eight goats. Only a small portion of DG720 is road accessible, which probably sees the highest hunter effort and therefore harvest. To offer more permits, better opportunity to hunters, and most likely better population management, DG720 should be split into three separate permits consisting of smaller hunt areas with separate quotas.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Jesse Dunshie (EG-F24-059)

PROPOSAL 56

5 AAC 85.040. Hunting seasons and bag limits for goat.

Establish an archery only registration goat hunt in Units 13D and 11 as follows:

Create an additional archery only registration goat hunt for RG580 (Units 13D and 11) with season dates of August 16 - 31. The permit bag limit is one goat for residents and nonresidents and the permit may only be issued in person at the same locations as the RG580 permit.

What is the issue you would like the board to address and why? Limited archery only goat hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-080)

PROPOSAL 57

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

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

B -Brown/Grizzly Bear: 13E within Denali State Park **TWO** [One] bear(s) every regulatory year from August 10-June 15

B -Brown/Grizzly Bear: 13 remainder **TWO** [One] bear(s) every regulatory – no closed season

What is the issue you would like the board to address and why? Brown and grizzly bears are currently at high population levels in Unit 13 and their hardship on moose and caribou are reaching

unstainable levels. Many hunters use bait stations and/or motorized vehicles hunt for brown/grizzly bears during the spring and early summer in Alaska but are unable to take a bear in the fall due to the one bear per regulatory regulation. This would allow for another opportunity to hunt brown/grizzly bears in the fall, while still allowing for traditional spring bear hunting opportunity. Unit 16 saw an increase to two brown/grizzly bears per regulatory year and the unit has seen the positive effects on moose populations with its change.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed in coordination with the Matanuska Valley Advisory Committee as many of our members are closely familiar with Unit 13 and its constituents are primary members of Unit 13.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (HQ-F24-033)

PROPOSAL 58

5 AAC 92.121. Intensive Management Plan V.

Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves as follows:

Decrease the minimum wolf population to 100 in Unit 13 in the Intensive Management Plan.

What is the issue you would like the board to address and why? The current minimum wolf population in Unit 13 is 135 which is too high for Nelchina caribou population recovery. The Nelchina caribou herd population objective is 35,000 - 40,000, we are currently at around 8000 ~ animals. The entire caribou harvest is closed, and the management objective for this herd is to provide for subsistence needs.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, with the public at our local advisory committee, and the ADF&G staff.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee (HQ-F24-003)

PROPOSAL 59

5 AAC 84.270. Furbearer trapping

Lengthen the wolf trapping season in Unit 11 as follows:

October 15 [NOV 10] - **April 30** [MARCH 31]

What is the issue you would like the board to address and why? Lengthen the Unit 11 wolf trapping season to align with the season dates in Units 12 and 13 in order to provide additional opportunity to harvest wolves. SRC members noted that wolves are abundant and that providing

additional harvest opportunity could help mitigate predation on other species such as sheep, moose, and caribou.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal is being submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, a citizen advisory committee. The Commission met in Gakona, Alaska, on March 14 and 15, to hear from the public and discuss a variety of issues related to fish and wildlife harvest. The Commission developed this proposal during that meeting.

PROPOSED BY: Wrangell-St. Elias National Park Subsistence Resource Commission (HQ-F24-005)

PROPOSAL 60

5 AAC 84.270. Furbearer trapping.

Lengthen the coyote trapping season in Unit 11 as follows:

October 15 [NOV 10] - **April 30** [MARCH 31]

What is the issue you would like the board to address and why? Lengthen the Unit 11 coyote trapping season to align with the season in Unit 12 in order to provide additional opportunity to harvest coyotes. Providing additional harvest opportunity could help mitigate predation on other species such as sheep, moose, and caribou.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal is being submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, a citizen advisory committee. The Commission met in Gakona, Alaska, on March 14 and 15, to hear from the public and discuss a variety of issues related to fish and wildlife harvest. The Commission developed this proposal during that meeting.

PROPOSED BY: Wrangell-St. Elias National Park Subsistence Resource Commission (HQ-F24-004)

PROPOSAL 61

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

Change the start date for the ptarmigan hunting season in Unit 13B as follows:

Ptarmigan Unit 13B

August 20 - February 15

10 per day - 20 in possession

What is the issue you would like the board to address and why? Ptarmigan season opening date in Unit 13B.

Ptarmigan season in Unit 13B opens August 10. Unit 13B is road accessible and sees a fair amount of hunt pressure. Much of the high country along the Denali Highway where the majority of the ptarmigan are taken, experience late spring hatches due to snow cover. The results in later hatching chicks that are still peeping when the present season opens August 10.

Birds that small are of marginal use for food. Hunting is enjoyable to be sure, but the primary objective should be the use of animals and birds we take. Thus, our committee feels that an August 20 opening would better address the issue of having a bird worth eating. This is the fifth game cycle our advisory committee has addressed the issue to no avail. We hope that this board would consider our experience and accept our proposal.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Paxson Fish and Game Advisory Committee.

PROPOSED BY: Paxson Fish and Game Advisory Committee (EG-F24-030)

PROPOSAL 62

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

Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D as follows:

Option 1

Unit	Season	Bag Limit
13A, 13C, 13D	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
13A, 13C, 13D	August 10 – March 31	10 ptarmigan per day, 20 in possession
13A, 13C, 13D	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Units 13A, 13C, and 13D to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Units 13A, 13C, and 13D ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17- 26 to do so. This would also allow individuals living in the region to take

advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Units 13A, 13C, and 13D by one month would be unlikely to cause a negative impact on the population. In the alternative, any potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.

PROPOSED BY: Jonathon Green (HQ-F24-028)

PROPOSAL 63

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

Require a registration permit to hunt ptarmigan in Units 13B and 13E as follows:

Units and Bag Limits (3)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Unit 13(B) 10 per day 20 in possession, <u>by registration permit only;</u>	Aug. 10–Feb. 15	Aug. 10–Feb. 15
...		
Unit 13(E) 10 per day 20 in possession, <u>by registration permit only;</u>	Aug. 10–Feb. 15	Aug. 10–Feb. 15
...		

What is the issue you would like the board to address and why? Ptarmigan hunting in Alaska is a very popular activity for both subsistence and non-subsistence users. Data from voluntarily submitted hunter harvested wings suggest Unit 13B is one of the most popular, if not the most popular, subunits to hunt ptarmigan in terms of the number of hunters that successfully harvested ptarmigan. Despite this popularity, there is no requirement for small game hunters to report on their harvest and all harvest data available is voluntarily submitted, with a few exceptions in state game refuges or management areas near urban areas.

Although voluntarily submitted harvest information is helpful to ADF&G, biologists have very limited ability to collect data on the total number of small game hunters from year to year or annual

harvest rates. Previous efforts to collect data through hunter surveys (2012–2013) from the large number of resident and non-resident hunters that had multiple license purchase options (e.g., resident hunting, resident hunting and trapping, non-resident small game, non-resident hunting, non-resident military hunting, non-resident military hunting and trapping, etc.) were hampered by low hunter response rates (11–30%) and the need to sample from all license purchase options to obtain a meaningful data set.

A registration permit for hunting ptarmigan in Unit 13B would provide important data from an area that receives heavy hunting pressure, has limited participation in voluntarily submitted harvest information, and has historically experienced multiple regulatory changes resulting from proposals submitted by members of the public and local advisory committees.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F24-076)

Palmer Area – Units 14A, 14B & 16

PROPOSAL 64

5 AAC 84.045(a)(12). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose draw permits in Units 14A and 14B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
Unit 14(A)		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 2,000 antlerless moose permits may be issued; or	Aug. 20–Sept. 25 (General hunt only) Nov. 1–Dec. 25 (General hunt only)	No open season
...		
1 moose by targeted permit only; by crossbow, shotgun or bow and arrow only; up to 200 permits may be issued	Winter season to be announced (General hunt only)	No open season
Unit 14(B)		
1 moose per regulatory year, only as follows:		
...		
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued.	Winter season to be announced (General hunt only)	No open season

....

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the Board of Game (board). There are two types of antlerless moose hunts in the Matanuska-Susitna Valley – a drawing permit hunt used to regulate growth of the moose population in Unit 14A, and targeted hunts used to mitigate public safety concerns in Units 14A and 14B.

Antlerless moose hunts have been authorized in Unit 14A since 2001 in order to regulate the growth of the population. The permit level was increased from 450 to 1,000 in 2013, to account for the continued increase in the population, and again in spring 2018 from 1,000 to 2,000. Increased harvest based on the increased permit levels has brought the population closer to the objective of 6,000–6,500 for the nit. Permit levels have been reduced significantly as the population approached the objective and will be adjusted as necessary.

Moose surveys conducted in November 2023 yielded an estimate of 6,657 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2020 survey estimate of 7,112 moose indicating that antlerless harvests are having the desired effect of reducing the population to near objectives. The sex and age composition demonstrated a bull:cow ratio of 30 bulls:100 cows and a calf:cow ratio of 28 calves:100 cows.

Moose-human conflicts have declined along with the moose population as it has approached the population objective. The targeted moose hunts in Units 14A and 14B, which are authorized to include an antlerless component, have been a tool to address public safety concerns related to moose-vehicle collisions and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 316 moose per year were killed in the Matanuska-Susitna Valley area during the last five years of average snowfall and substantially more are killed during higher snowfall years. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure. Antlerless hunts are an important tool to control the moose population’s trajectory and recommend additional moose hunting opportunity in the Matanuska-Susitna Valley when appropriate.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-062)

PROPOSAL 65

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

Decrease the number of antlerless moose permits for Unit 14A as follows:

Aug. 25 - Sept. 25 1 antlerless moose by drawing permit only; up to **1,000** [2,000] antlerless moose permits may be issued;

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 200 permits may be issued. Winter season to be announced by emergency order.

Total annual permits that may be issued to harvest antlerless moose in Unit 14A shall not exceed 1,000.

In order to better control moose reductions in specific habitat areas, all November and December Unit 14A moose permits may only be issued in the same specific hunt areas as the fall permit hunts — Not Unit-wide.

Note: this proposal only seeks to address the portions of 5 AAC 85.045 allowing harvest of antlerless moose by permit(s) in Unit 14A.

What is the issue you would like the board to address and why? Antlerless moose permit hunting regulations in Game Management Unit 14A are too liberal with amounts of permits allowed far in excess of what has ever been granted. Issuing hundreds of November and / or December permits adds stress to the moose population at times when they may already be struggling through winter conditions, and can result in over harvest of moose in easily accessible areas with prime winter habitat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? YES. This proposal was considered and approved without objection for submission at the April 17, 2024, Matanuska Valley Fish and Game Advisory Committee meeting, which included considerable discussion with ADF&G game division staff about this proposal.

PROPOSED BY: Matanuska Valley Fish & Game Advisory Committee (HQ-F24-020)

PROPOSAL 66

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

Open a fall, archery only moose hunt in Units 14A and 14B as follows:

Units 14A, 14B (Harvest Tag areas only) One bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines on at least one side by bow and arrow only from August 10-19 and **September 26-30.**

What is the issue you would like the board to address and why? Years ago, the general moose season in Units 14A and 14B was augmented with an early archery season. While this was a positive move for increasing hunter opportunity but the early season, especially in recent years, is fraught with challenge, most notably the warm temperatures which make responsible meat handling (and aging) difficult. Archery hunting has a low success rate even during the rut and extending the archery season for the last five days of September would increase opportunity during a colder, more meat friendly time of year, without significant impact on moose populations. This would also give hunters who wish to hunt with bow and arrow a few days of time later in the season to hunt without fear of being shot at/over trying to get close to a bull.

It's also worth noting that, based on the popularity of the Eklutna Lake archery moose hunt, there are a lot of hunters very interested in finding archery moose hunting opportunities. This would be a step in the right direction toward increasing opportunity for them.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Paul Forward (EG-F24-095)

PROPOSAL 67

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

Open a fall, archery only moose hunt in Unit 16A as follows:

Unit 16A (Harvest Tag areas only): One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by bow and arrow only from August 10-19 and **September 26-30.**

What is the issue you would like the board to address and why? Years ago, the general moose season in Units 14A, 14B and 16A was augmented with an early archery season. While this was a positive move for increasing hunter opportunity but the early season, especially in recent years, is fraught with challenge, most notably the warm temperatures which make responsible meat handling (and aging) difficult. Archery hunting has a low success rate even during the rut and extending the archery season for the last five days of September would increase opportunity during a colder, more meat friendly time of year, without significant impact on moose populations. This would also give hunters who wish to hunt with bow and arrow a few days of time later in the season to hunt without fear of being shot at/over trying to get close to a bull.

It's also worth noting that, based on the popularity of the Eklutna Lake archery moose hunt, there are a lot of hunters very interested in finding archery moose hunting opportunities. This would be a step in the right direction toward increasing opportunity for them.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Paul Forward

(EG-F24-098)

PROPOSAL 68

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

Change the bag limit of the fall, Tier II moose hunt in Unit 16B as follows:

If the harvestable portion of moose in Unit 16B is 199 moose or less then there will be a Tier II season in the fall, August 20 to September 25th with a **limit of 1 bull** and the winter season.

What is the issue you would like the board to address and why? Current regulations state that when the harvestable surplus of moose in Unit 16B numbers 199 or less, the Unit goes to a Tier II season with a fall season that requires spike-fork, three brow tines, or 50-inch antler requirement and a winter season that is any bull. The committee sees no reason to limit the fall portion of this season if it occurs, to bulls with these antler configurations when the winter portion of the hunt has no restriction. We fail to see the logic. This hunt is already limited by the number of participants which will limit harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Mt. Yenlo discussed and recommended this proposal.

PROPOSED BY: Mt. Yenlo Fish and Game Advisory Committee

(EG-F24-022)

PROPOSAL 69

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

Shorten the season for the Tier II moose hunt in Unit 16B as follows:

TM565, TM567, and TM569 season: December 15th to February 28th

We would like to eliminate March from the Tier II season in Unit 16B.

What is the issue you would like the board to address and why? Harassment of winter stressed moose in March. The Tier II moose hunt was extended into March when the season start date was pushed back to December 15th to curtail trophy hunting of winter moose under the guise of subsistence. The season prior to this change ended February 28th. We feel that two and half months is plenty of time for a diligent subsistence hunter to harvest a better quality animal and the later period just leads to more harassment determining legality as antler shed spots grow darker and unnecessary stressing of already winter stressed moose.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was discussed and recommended by the Mt. Yenlo Advisory Committee.

PROPOSED BY: Mt. Yenlo Fish and Game Advisory Committee (EG-F24-019)

PROPOSAL 70

5 AAC 85.050. Hunting seasons and bag limits for brown bear.

Extend the hunting season for brown bear in Units 14A and 14B as follows:

I suggest extending the brown bear hunting season in Unit 14A and 14B to June 15.

Unit 14A: One bear every regulatory year Sept 1-June 15

Unit 14B: One bear every regulatory year Aug 10-June 15

What is the issue you would like the board to address and why? With Heavy snow fall becoming a norm in Southcentral, in these Units brown bear hunters often do not get an opportunity to harvest when bears are in accessible areas. Brown bears will often show up on bait stations and accessible areas one-two weeks after the season closes May 31st.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Caleb Martin (EG-F24-034)

PROPOSAL 71

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

Extend the brown bear hunting season in Unit 14B as follows:

I recommend extending brown bear season through June 30 allowing these bears to be taken through the baiting season. To align with some of the other areas opened to baiting brown bears.

The new regulation change would read “One bear every regulatory year **August 10-June 30** in Unit 14B.”

What is the issue you would like the board to address and why? The population of brown bears in Unit 14B is growing rapidly. In the span of eight years my trail cameras in Unit 14B over bait have shown five-six brown bears and five-six black bears in 2015 and in 2023, 10-15 brown bears and only one black bear.

Brown bear season closes on May 31, depending on the spring the brown bears are not showing up until around the first week of June. If the population of brown bears is not controlled I believe we will continue to see increasing brown bear populations and decreased black bear populations until eventually the area will be depleted of black bears completely.

Also in Unit 14B, the moose population is on the lower end of the acceptable objective. Why not try to get ahead of it with extending the brown bear season and giving hunters more hunting opportunity to harvest brown bears.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Dominic Nickles (EG-F24-010)

PROPOSAL 72

5 AAC 85.015. Hunting seasons and bag limits for black bear.

Eliminate the harvest ticket requirement for hunting black bear in Unit 16 as follows:

Black Bear GMU 16 No harvest ticket. Must be sealed within 30 days of harvest.

What is the issue you would like the board to address and why? Unnecessary requirement for harvest ticket for black bears in Unit 16. This has never been necessary. Bears are required to be sealed just like brown bears, however no harvest ticket is required for brown bears. This requirement just leads to fraud, waste and abuse and possibly less bears harvested due to not having a harvest ticket when defending property, fishing, or hunting other species.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The Mt. Yenlo Advisory Committee discussed and recommended this proposal.

PROPOSED BY: Mt. Yenlo Fish and Game Advisory Committee (EG-F24-020)

PROPOSAL 73

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

Change the bag limit for sheep in Unit 14A draw hunts to any ram as follows:

This proposal would change the bag limit for Dall sheep in Unit 14A south and east of Matanuska River from one ram with full-curl horns or larger, both horns broken, or at least eight-years-old, to one ram.

What is the issue you would like the board to address and why? The issue is reduced sheep hunter satisfaction and harvest opportunity. Many new and inexperienced sheep hunters are less likely to participate because of challenges with judging legal full-curl rams. Previously, many of the any-ram sheep hunters reported high satisfaction and less stress when not having to "be 100% sure" of shooting what they believe to be a legal ram. In addition, ADF&G staff have reported recent increased take of sub-legal rams (statewide) under full-curl bag limits concurrent with

reduced overall sheep populations. The any-ram bag-limit is a positive alternative to full-curl and is entirely manageable and appropriate under a regulated drawing hunt by setting permit levels based on population survey data and observed mature ram numbers. Sheep hunters participating in any-ram hunts still prefer older-aged rams and generally take more older rams (>4 yrs) which may be more closely simulating natural mortality in the ram component of the population. Having a few limited sheep drawing hunts with this type of bag limit benefits both sheep hunters and ADF&G by providing unique draw hunt opportunity, increased hunter satisfaction, and reduced sub-legal harvest.

According to ADF&G, more people applied for the Unit 14A any-ram drawing hunts than any other sheep draw hunts available in Alaska except for the Tok Management Area (TMA) draw hunts (currently significantly reduced due to population issues). Even for a limited number of sheep draw hunts - in this case Unit 14A - the any-ram bag limit would provide a popular alternative for sheep hunters and address current concerns regarding sub-legal harvest, both of which increase hunter satisfaction and meet department goals (reduce sub-legal harvest and increase hunter satisfaction).

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? As of this date I have not coordinated with others regarding the proposal. Earlier, I consulted with ADF&G staff regarding current trends. I plan to discuss the proposal with the Mat Valley Fish and Game Advisory Committee and possibly other advisory committees when they resume meeting in the fall.

PROPOSED BY: Tony Kavalok (EG-F24-055)

PROPOSAL 74

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

Establish a resident, archery only, sheep drawing hunt in Unit 14A as follows:

Create an archery only resident dall sheep drawing hunt for Unit 14A that includes all units within 14A into one hunt area. Season dates would be October 1-15th and the bag limit would be a full curl ram. It is understood that sheep numbers are down in these areas so the department may only want to issue 1-5 tags until populations begin to recover. Archery hunting for full curl rams is very low success < 5% but provides archery hunters the opportunity to hunt without the competition of rifle hunters who can shoot rams at ever increasing distances. As an item of note an additional proposal was submitted in the statewide regulations that would NOT allow the use of arial scouting during these season dates.

What is the issue you would like the board to address and why? Limited archery only sheep hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSAL 75

5 AAC 92.122. Intensive Management Plan VI.

Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan as follows:

5 AAC 92.122

...

(b)

(4)

...

(B) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land-and-shoot permits as a method of wolf removal **and may allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783.**

....

What is the issue you would like the board to address and why? The wolf control objective in the Intensive Management Plan for Moose in Unit 16 is to reduce the population to 35–55 wolves in Unit 16B. In March of 2023 the minimum count of wolves in Unit 16 indicated at least 120 wolves with several packs being reported in the unit that were not included in the minimum count. Six of the packs were located again in the fall of 2023, and all had increased in number by 2–6 per pack, indicating that the population was over 120 with the addition of the 2023 recruitment. A take of at least 70% annually is needed to achieve the population reduction objective. Given the high recruitment rate of wolves, population reduction is unlikely unless there is substantial harvest over a short period of time.

100 wolves need to be taken annually to reach the wolf population objective of 35-55 wolves. Based on participation the last time the program was active, it is unlikely this level of harvest will be achieved in this first year of the reactivated program due to potentially low participation in the program. There are two primary reasons that participation is low. First, a high proportion of wolves sealed from Unit 16 have lice (~60% in RY23) resulting in poor pelt quality; and second, control pilots have many options to participate in same day airborne programs such as in Units 9, 17, 19, and all of Unit 13 except 13C. If pelt quality remains an issue and pilots and public participation remains low in the future it may be necessary for the department to actively remove wolves from this area to achieve the wolf reduction objectives.

When the Unit 16 Predation Control Area was created the regulations did not allow for the department to do the removal. Adding the ability for the department to conduct control efforts of wolves and bears ensures the department has the ability to actively manage predators in the area to aid in achieving the population and harvest objectives set by the board. The department has no plans to activate bear control at this time.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-073)

PROPOSAL 76

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

Allow the take of brown bear in Unit 16, the same day airborne as follows:

Existing regulation

•You may hunt black bear in Unit 16 from Oct. 1-Aug. 9 the same day you have flown, provided you are at least 300 feet from the airplane

Proposed regulation

•You may hunt black bear **and brown bears** in Unit 16 from Oct. 1-Aug. 9 the same day you have flown, provided you are at least 300 feet from the airplane

What is the issue you would like the board to address and why? Increase harvest opportunity for brown bears in Unit 16B.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Jon Kruger (HQ-F24-008)

PROPOSAL 77

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

Extend the brown bear season in Unit 14B as Follows:

Unit 14B One bear every regulatory year Aug. 10- June 15th

Extending the season by 15 days would ensure that brown bears hides would still be of good trophy quality. If this regulation is passed it would align with the Unit 14C remainder of June 15th for brown bear.

What is the issue you would like the board to address and why? Brown bear population currently in Unit 14B has increased substantially. Due to the late springs/ break ups over the past few years, brown bears are showing up after season is closed. Taking over bait stations, making it very difficult to harvest a black bear. With the surplus of brown bears, extending the brown bear season in Unit 14B would allow hunters to harvest brown bears into June. It also has the potential to have positive effects on the moose population. There is no threat of over harvest in this very heavily forested unit by extending the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed in coordination with the Matanuska Valley Advisory Committee.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (HQ-F24-049)

PROPOSAL 78

5 AAC 92.122. Intensive Management Plan VI.

Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan as follows:

Change the regulation so if the intensive management is active, hunters or trappers holding a current license can hunt same day airborne as long as 300' from airplane. If the intensive management area is inactive, we go back to the past 3 a.m. regulation.

What is the issue you would like the board to address and why? Change same day airborne for wolf in active intensive management areas to allow hunting same day airborne as long as 300' from the airplane. I believe it should be allowed in the predator control areas for hunters and trappers to have the opportunity to shoot the same day airborne when the state is allowing aerial shooting but only to a few approved pilots and gunners.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee.

PROPOSED BY: Greg Nelson (EG-F24-009)

PROPOSAL 79

5 AAC 84.270. Furbearer trapping.

Extend the wolf trapping season in Unit 14A as follows:

Unit 14A wolf trapping season extended by one month to April 30th.

What is the issue you would like the board to address and why? To lengthen wolf trapping season in Unit 14A by one month to April 30th like all of the other units in Alaska. I think by having one extra month it'll give more time as the weather is changing to be able to harvest more wolves.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No. I trap all over in Alaska and having that one extra month like over in Unit 16 helps tremendously in reducing predator numbers.

PROPOSED BY: Michael Gozdor II (EG-F24-007)

PROPOSAL 80

5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

Require sealing of beaver taken in Unit 16 as follows:

Beaver GMU 16 Must be sealed within 30 days of close of season.

What is the issue you would like the board to address and why? A severe decline in beaver in much of Unit 16 has occurred. At the same time, the Board of Game has liberalized seasons, methods and means. It has been at least a couple of decades since beaver were sealed in Unit16. The committee has some theories as to why the beaver have declined. We would like the Department of Fish and Game to collect some sealing information, so as to compare current harvests, take, and size composition with past data when populations were far more robust. This information would be valuable in assessing current problem and cost very little. We would like this to continue for three years.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The Mt. Yenlo AC discussed and recommended this proposal.

PROPOSED BY: Mt Yenlo Fish and Game Advisory Committee (EG-F24-021)

PROPOSAL 81

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours as follows:

Persons setting traps and snares for furbearers and fur animals must check their traps and snares not less frequently than every 36 hours in those parts of Unit 14A that are within two miles of a publicly maintained road (i.e. a road that is open to the public and plowed to be accessible by automobile).

What is the issue you would like the board to address and why? Many Alaskans, including myself, think it is inhumane to leave an animal caught in a trap or snare to die of starvation or exposure because a trapper fails to check his traps frequently. Criminal penalties are imposed under Alaska law against the owners of domestic animals who fail to feed or shelter their domestic animals because it is inhumane. Ethical trappers of furbearers and fur animals return frequently to their traps to prevent waste and also to lessen the suffering of trapped animals. This proposal is intended to apply only to a small part of a heavily populated part of Alaska in the hope that trappers and persons opposed to trapping on ethical grounds can work together in lessening the suffering of animals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I am a member of the Anchorage Advisory Committee and serve on the Game subcommittee. The Anchorage AC does not usually submit proposals and does not meet until October 2024. The Anchorage AC will review and comment on this proposal when it reviews all the proposals to be considered by the Board of Game.

PROPOSED BY: Kneeland Taylor (EG-F24-083)

PROPOSAL 82

5 AAC 92.550. Areas closed to trapping.

Establish 50-yard trapping setbacks along specific trails in Unit 14 as follows:

In 2022, Alaska Wildlife Alliance submitted a proposal for 50-yard trap setbacks from multiple trails in Units 13, 14 and 16. At the 2022 Central & Southwest meeting, the Board of Game deferred the proposal until a stakeholder meeting between trappers and non-trappers was convened under the facilitation of a board member. The purpose of the meeting was to discuss the setback proposal and “attempt to come up with solutions that would reduce potential conflicts between trapping and loose dogs, along highly developed trails in the Matsu Borough.”[1]

Stakeholders included representatives from Alaska Wildlife Alliance, non-trapper trail users, and trappers representing Alaska Frontier Trappers Association and Alaska Trappers Association. ADF&G staff were also present. The one-day meeting adjourned with consensus on the following setback location and conditions. We seek for these agreed-upon trails and restrictions to be codified in this proposal:

No trapping or snaring within 50-yards of the below-listed trails unless the traps are elevated three feet above hard ground, enclosed, underwater, or under ice. Trapping would still be permitted on the below-listed trails if they are elevated three feet above hard ground, enclosed, underwater, or under ice. All other forms of lawful trapping would also still be allowed near the below-listed trails, provided they are placed farther than 50-yards from the trail.

Unit	Trail name	Description
14B	Talkeetna Lakes Park trail system (XYZ lakes trails)	A trail system for skiing, hiking and mountain biking located within the Talkeetna Lakes Park. Construction of a trailhead facility at the park entrance was completed in 2007 and trails are maintained by Denali Nordic Ski Club. See map here
14B	Dorothy Jones Trail System (Susitna Valley High School)	Trail system consists of a series of loops built on rolling hills between the Su Valley High School and Montana Lake. There are varying levels of difficulty from novice to expert.
14A	Matanuska Lakes State Recreation Area developed trails	Includes a pedestrian year round trail system and maintained ski trails. Map available here .
14A	Scout Ridge Loop	Well-established trail located off Hayfield Road in the Knik-Fairview area. This year-round trail is used in the winter by hikers, skiers and snowshoers. See map here .
14A	Reflections Lake Trail	Located south of Palmer just off the west side of the Glenn Highway on the north side of the Knik River. This year-round trail is used in the winter by hikers, skiers and snowshoers, and in the summer/fall by hikers, hunters and fishermen. See map here .
14A	Nelson Road	Palmer Hay Flats area. See map here .
14A	Rabbit Slough Boat Launch Access Road	Palmer Hay Flats. See map here .
14A	Wasilla Creek Boardwalk (Nelson Road)	Palmer Hay Flats. See map here .
14A	Government Peak Recreation Area developed Trails system within the southern development area	There are 4 miles (6.5 km) of Nordic skiing/hiking trails built for all skill levels. There is an additional 4 miles of bike trails intertwining with the skiing/hiking trails. Below the Chalet there is a sledding hill for all ages. The ski trails area maintained by the Mat-Su Ski Club for both summer and winter use. Mountain bike trails are maintained by the Valley Mountain Bikers and Hikers. See map here .

14B	Independence Mine ski trails	Year round trail within the Hatcher Pass Management area. See map here .
14B	Gold Mint trail to Mint Glacier	Year round trail within the Hatcher Pass Management area. See map here .
14B	Reed Lakes trails to lower Reed Lake	Year round trail within the Hatcher Pass Management area. See map here .
14B	Archangel Road to the gate	Year round trail within the Hatcher Pass Management area. See map here .

Fifty yards is the minimum precedented distance for trap setbacks in Alaska. In Unit 1C, for example, Juneau-area designated trails have a regulated ¼ mile trap setback and 15C has 100-yard trap setbacks from specific trails. For trails outside the Juneau area in Unit 1C, the ¼ mile setback is also applied except for traps with an inside jaw spread of five inches or less, which can only be set if they are at least five feet above the ground and snow and are more than 50 yards from the trail. Additionally, in 2019 the Anchorage municipality passed an ordinance for 50 yard no-trap setbacks from designated trails in the Anchorage Municipality. In sum, the 50-yard distance is precedented as a reasonable compromise between various users, and has been implemented in other areas of the state. Trappers at the stakeholder meeting agreed that the setback distance would be appropriate on the above-listed trails.

The setback distance is small enough to not significantly reduce the Board of Game’s ability to manage wildlife. Should trapping of a species within this setback be proven biologically necessary, the board may utilize a temporary permit system that identifies active traps in specific cases or modify the list of trails in the setback system. In areas that permit off-leash dog use, dogs must still be under voice and sight control to be protected by this setback. For the protection of users and wildlife, dogs must be in voice and sight control in all multi-use settings.

Finally, defining the trail would not pose a regulatory burden, as the trails are mapped and the same process for identifying the trail boundaries and regulating trap setbacks in Units 1C and 15C could be applied to Unit 14.

[1] 2022 RC014

What is the issue you would like the board to address and why? While the majority of trappers set traps a responsible distance from multi-use trails, some traps on/near Mat Su area trails and trailheads have incurred serious consequences for skiers, bikers, and walkers with pets. This issue was brought to the Matanuska-Susitna Borough (MSB) Assembly in 2017, when over 3,500 MSB residents petitioned assembly members to protect multi-use trails after 11 dogs had been caught in traps on local trails. The MSB approved trapping restrictions on six borough-managed trails and on school grounds, but did not issue regulations for state-managed trails in deference to the regulatory powers of the Board of Game. While the borough regulations limited trapping on a few

trails in 2017, each year since there have been reports of pets in off-leash areas being caught and even killed in legally set traps on/near multiuse trails.

Land managers and law enforcement do not track trap-safety incidents, so reports are collected ad hoc and considered incomplete. Since 2019, Alaska Wildlife Alliance started tracking the incidents reported to our organization, and transitioned the reporting platform online so the public could see when a trap encounter was reported on an interactive map (www.akwildlife.org/safetrails).

Many people live in Alaska for the year-round recreational activities, and tens of thousands of people in the MSB and surrounding areas enjoy multi-use trails during the trapping season. We respect the rights of trappers to utilize multi-use trails, and seek reasonable, regulated boundaries that ensure safe multi-use on some trails for the benefit of thousands of other trail users. The goal of this proposal is not to unduly restrict trapping, but to protect and reduce the uncertainty for users of multi-use trails by providing defined boundaries on trap placement.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The setback conditions and trail recommendations in this proposal were negotiated by representatives present at the 2022 stakeholder meeting. Alaska Trappers Association (ATA) was presented with a draft of this proposal before submission, but ATA has not decided whether to support or oppose or amend this proposal before it was submitted.

PROPOSED BY: Alaska Wildlife Alliance (EG-F24-087)

PROPOSAL 83

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

Extend the spring hunting season for ptarmigan in Unit 16 as follows:

Option 1

Unit	Season	Bag Limit
16	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
16	August 10 – March 31	10 ptarmigan per day, 20 in possession
16	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Unit 16 to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Unit 16 ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17- 26 to do so. This would also allow individuals living in the region to take advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Unit 16 by one month would be unlikely to cause a negative impact on the population. In the alternative, any potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.

PROPOSED BY: Jonathon Green (HQ-F24-025)

PROPOSAL 84

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

Extend the spring hunting season for ptarmigan in Units 14A and 14B as follows:

Option 1

Unit	Season	Bag Limit
14A, 14B	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
14A, 14B	August 10 – March 31	10 ptarmigan per day, 20 in possession
14A, 14B	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Units 14A and 14B to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Units 14A and 14B ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17- 26 to do so. This would also allow individuals living in the region to take advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Units 14A and 14B by one month would be unlikely to cause a negative impact on the population. In the alternative, any

potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.

PROPOSED BY: Jonathon Green

(HQ-F24-026)

Statewide Regulations Meeting

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ALASKA BOARD OF GAME
Statewide Regulations Meeting
Evan Civic and Convention Center
March 21-28, 2025

TENTATIVE AGENDA

Note: This Tentative Agenda is subject to change throughout the course of the meeting. It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

Friday, March 21, 8:30 a.m.

OPENING BUSINESS

Call to Order / Purpose of Meeting

Introductions of Board Members and Staff

Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting. Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

Saturday, March 22, 8:30 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

Sunday, March 23, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

Monday, March 24 thru Thursday, March 27, 8:30 a.m.

BOARD DELIBERATIONS continued

Friday, March 28, 8:30 a.m.

BOARD DELIBERATIONS continued/conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

Agenda Notes

1. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
2. A live audio stream for the meeting is intended to be available at: <https://boardofgame.adfg.alaska.gov>
3. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-4110 no later than two weeks prior to start of the meeting to make any necessary arrangements.

Migratory Bird Hunting

PROPOSAL 85

5 AAC 92.013 Migratory bird hunting guide services.

Change the definition for migratory bird hunting guide services to include transporter services as follows:

5 AAC 92.013 Migratory bird hunting guide services.

...

(c) For purposes of this section,

(1) “migratory bird hunting guide” means a person who provides migratory bird hunting guide services;

(2) “migratory bird hunting guide services” means to assist **or transport**, for compensation or with the intent to receive compensation, a migratory bird hunter to take or attempt to take migratory birds by accompanying, **transporting**, or personally directing the hunter in migratory bird hunting activities:

(3) “person” includes a business entity **or affiliated services such as water taxi, air taxi, fishing charter outfitters; combo hunting/fishing boats; or lodges; when serving small game hunters to, from, or in the field; their equipment; or migratory birds harvested.**

What is the issue you would like the board to address and why? There are many different migratory bird hunting guide services not providing registration forms required by the department under 5 AAC 92.013 for basic information on who and where commercially compensated migratory bird hunting services are taking place.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Nancy Hillstrand (EG-F24-062)

PROPOSAL 86

5 AAC 92.010. Harvest tickets and reports.

Require mandatory harvest reporting of sea ducks as follows:

I propose a mandatory harvest reporting of sea ducks in Alaska.

ADF&G should monitor changes in sea duck harvest through a regulation requiring sea duck harvest reporting. New management language could include:

- Required possession a paper or electronic harvest record card for sea ducks.
- After taking a sea duck into possession, required recording of all information on the harvest record card or through a mobile application.
- Consequences for not reporting.

Language could be modeled on the State of Washington’s management approach through Washington Admin. Code § 220-416-060 - 2023-2024, which reads: “Hunters must physically possess a special 2023-2024 paper or electronic hunting authorization and harvest record card for sea ducks when hunting scoter, long-tailed duck, and goldeneye in Western Washington. Immediately after taking a sea duck into possession, hunters must record all required information on the harvest record card. Hunters required to physically possess a paper harvest record card must enter all required information in ink. Hunters required to physically possess an electronic harvest record card must enter all required information through the licensing mobile application.”

What is the issue you would like the board to address and why? Accurate sea duck harvest numbers are needed to assure hunt opportunities now and in the future. Alaska’s current migratory bird harvest reporting system, known as HIP, uses randomized voluntary reporting and provides only slim and spotty information. As a result, Alaska has never adjusted bag limits on the basis of HIP reporting, according to ADF&G managers.

Alaska does not currently require sea duck harvest reporting, since sea ducks are classified as small game. Harvest reporting isn’t typically required for small game, because, in general, these species are evolved to recover quickly from big drops in population. But sea ducks are special and they do not recover quickly, which means there are long-term negative effects of over-harvest. According to the Sea Duck Joint Venture, populations are slow to recover for the following reasons:

1. Sea ducks are known to have a remarkable degree of site fidelity—around 5 miles or so—which means that if an area’s population is depressed, birds from other areas will not boost recovery.
2. In general, sea ducks do not breed until they are 2 or 3 or so years old, which is late in comparison darling ducks.
3. They lay only one clutch of eggs per year, in contrast with the 2 or 3 for many dabbling ducks.
4. They have significantly lower chick survival rates than other ducks.

Sea duck populations across the United States have fallen 30% since 1970, and they remain in decline, according to the U.S. Committee of the North American Bird Conservation Initiative’s “2022 State of Birds Report”. On the bright side, the report notes that efforts at conservation have been shown to be effective. This proposal is supported by three consecutive years of Kachemak Bay Community Science Sea Duck Surveys—a local annual effort of 10 boats and over 30 people. This survey effort started in 2020/21, because residents and hunters in Kachemak Bay noticed a significant increase to sea duck hunting pressure, as a result of the arrival of a few more guides. Local birders began monitoring populations to create a population index. Our population index does not aim to estimate total number of birds in Kachemak Bay, but by focusing on a few areas with dense sea duck populations, we are able to see population trends—an approach used by

ADF&G managers across many species in Alaska. Our data shows that populations have not bounced back after a significant harvest. Fish and Game has historically monitored sea duck populations in Kachemak Bay, but they have not surveyed in Kachemak Bay since several years before community science surveys began, so our data is the only record of this trend.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was submitted at the 2022 the Southcentral Board of Game meeting with support from the Homer AC. At that time, the BOG recommended that it be resubmitted as a statewide proposal.

PROPOSED BY: Penelope Haas (HQ-F24-030)

PROPOSAL 87

5 AAC 92.100. Unlawful methods of hunting waterfowl, snipe, and cranes.

Restrict the use of boats for hunting waterfowl as follows:

5 AAC 92.100. Unlawful methods of hunting waterfowl, snipe, and cranes.

(a) The following methods and means of taking waterfowl, snipe, and cranes are prohibited, in addition to the prohibitions in 5 AAC 92.080:

(1) with a rifle or pistol, a shotgun larger than 10 gauge, or a shotgun not plugged to a three shell capacity;

(2) from a motor-driven boat unless the motor has been completely shut off and the boat's progress from the motor's power has ceased;

(3) from any mechanical vehicle; however, a power or sailboat may be used only as a direct means of retrieving a dead or injured bird; **all boats shall remain stationary throughout the duration of the hunt, beached or anchored, within 100 yards of those discharging firearms to eliminate driving, herding, or chasing migratory birds into hunters on land, or on other boats.**

What is the issue you would like the board to address and why? While use of a moving vessel is legal for retrieval of dead or crippled waterfowl, this exception is used to justify continual movement of affiliated vessels during a hunt resulting in illegal driving, herding, or chasing migratory birds into single or multiple hunter parties on shore, or on other boats.

Consistent with resource conservation, please remove loopholes that invalidate fair chase purposes of 5 AAC 92.100 Unlawful methods of hunting waterfowl snipe and cranes.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Nancy Hillstrand (EG-F24-066)

Cultural Permits

PROPOSAL 88

5 AAC 92.034. Permit to take game and use game for cultural purposes.

Add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Department of Fish and Game as follows:

The commissioner may issue a permit for the taking, and use within this state, of game for the teaching and preservation of historic or traditional Alaskan cultural practices, knowledge, and values, only under the terms of a permit issued by the department upon application. A permit may not be issued if the taking of the game can be reasonably accommodated under existing regulations. For purposes of this section, "game" includes

- (1) deer;
- (2) moose;
- (3) caribou;
- (4) black bear;
- (5) mountain goat;
- (6) small game;
- (7) furbearers;
- (8) any migratory bird for which a federal permit has been issued; and
- (9) musk oxen in Unit 18;

(10) wood bison

What is the issue you would like the board to address and why? On April 2, 2024, the Commissioner announced that ADF&G will reintroduce wood bison to the Minto Flats State Game Refuge in summer of 2024. In the announcement, the commissioner articulates the desire of the state to continue developing ways in which residents of local communities might be involved in the bison restoration project. As articulated in ADF&G's Spring 2023 news release, "This restoration isn't just about ecological conservation; it's about enhancing the cultural, economic, and social fabric of our state, enriching the lives of its people and communities."

A regulatory response is needed to protect Alaskan cultural practices, knowledge, and values. In regions where bison's cultural significance now exists predominantly in story form, such as Fort Yukon, testimonies shed light on ancestral knowledge that has simply not been practiced for over a generation now, but tradition still exists. Despite historical disruptions like boarding schools and cultural loss, the resurgence of wood bison offers a tangible opportunity for reconnection and revitalization.

In other communities such as Minto, Nenana, and Manley surrounding the Lower Tanana lands in which the new herd is to be released, less oral tradition exists and any ceremonial or cultural practices that Tribes once engaged in is minimal. However, Alaska Native values are based around adaptivity - adaptivity to the seasons, the land, changes to the environment and ecosystem, and abundance of the landscape. Cultural traditions are based on what the land provides and relationship to species or resources. As the environment and resources of the land, management decisions, and climate to evolve, so will Alaskan cultural practices and knowledge. Regulation must evolve at the same rate.

This proposal embraces the adaptive nature of Alaska Native values, and recognizes the evolving landscape of ceremonial practices. Including regulatory language, empowers Tribes and communities to preserve traditions using both established and newly introduced species in ceremonies and practices. Adding “wood bison” to 5AAC 92.034 honors Alaskan cultural practices and knowledge. It upholds honoring Alaska Native traditions, revitalizing cultural practices, and fostering a deeper connection to our shared heritage. The inclusion of wood bison represents the profound cultural and educational opportunities that Wood Bison present for the transference of both new and ancestral knowledge and skills.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed by the Minto-Nenana Fish and Game Advisory Committee with involvement from Tanana- Rampart-Manly Advisory Committee members and ADF&G staff.

PROPOSED BY: Minto-Nenana Fish and Game Advisory Committee and Tanana Chiefs Conference (HQ-F24-044)

Hunter Education Requirements

PROPOSAL 89

5 AAC 92.003. Hunter education and orientation requirements.

Require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second degree of kindred as follows:

Amend hunter education requirements for nonresident hunters as follows:

92.003 Hunter education and orientation requirements.

(c) A nonresident hunter [in Unit 17(B)] must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose [or] **and** must be accompanied by a registered guide or resident family member within the second degree of kindred.

[(d) A nonresident hunter in Unit 19(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or caribou or must be accompanied by a registered guide or resident family member within the second degree of kindred.]

What is the issue you would like the board to address and why? Currently, all adult Alaskan residents under the age of 39 must successfully complete a certified hunters education course in order to hunt in Units 7, 13, 14, 15, and 20 under

5 AAC 92.003. Hunter education and orientation requirements. A person born after January 1, 1986 that is

(1) required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 7, 13, 14, 15, and 20

Whereas nonresident hunters are afforded the option to forgo a certified hunters education course (including trophy recognition and meat care) under

(2)(c) A nonresident hunter in Unit 17(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or must be accompanied by a registered guide or resident family member within the second degree of kindred.

(d) A nonresident hunter in Unit 19(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or caribou or must be accompanied by a registered guide or resident family member within the second degree of kindred.

As such, nonresidents are legally sanctioned to sidestep hunters' education (including trophy recognition and meat care) so long as they are accompanied by a registered guide or resident family

member within second degree of kindred. Whereas adult Alaskan residents are not provided with this option to hunt in Units 7, 13, 14, 15, and 20.

Whereas the Board of Game must provide that the subsistence taking of moose, deer, elk, and caribou by residents has preference over taking by nonresidents under:

Sec. 16.05.255. Regulations of the Board of Game; management requirements

(d) Regulations adopted under (a) of this section must provide that, consistent with the provisions of AS 16.05.258, the taking of moose, deer, elk, and caribou by residents for personal or family consumption has preference over taking by nonresidents.

Additionally, nonresidents are required to be accompanied by a registered guide or resident family member within second degree for brown bear, grizzly bear, mountain goat, or sheep hunting under **Sec. 16.05.407. Nonresident hunting big game animals must be accompanied.** While **Sec. 16.05.407** does not apply for the taking of moose or caribou, it also does not prevent the board from doing so.

Moreover, residents born before January 1, 1986, are not required to complete a hunters education course. Therefore, hunts where nonresident hunters are accompanied by a 39-year-old or older family member (within the second degree of kindred), neither have received formal training in firearms safety, wildlife conservation, and respect for Alaska’s natural resources, landowners, and other hunters. Requiring nonresident hunters to take a hunters education course (including trophy recognition and meat care) provides them with the maximum safety and education.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I worked with members of the public and received feedback from ADFG staff.

PROPOSED BY: Janessa Newman and Charlie Wright (EG-F24-099)

PROPOSAL 90

5 AAC 92.003. Hunter education and orientation requirements.

Require all goat hunters to pass an online mountain goat quiz prior to hunting as follows:

Existing regulation:

If you are planning to hunt goats in Units 1, 4, 5, 6C, or 6D you are required to pass the online mountain goat quiz prior to hunting.

Proposed regulation

All goat hunters are required to pass the online mountain goat quiz prior to hunting.

What is the issue you would like the board to address and why? Increase hunter awareness and training in sex identification of mountain goats to help reduce female harvest. Reduced female harvest supports greater populations and more opportunity for hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Jon Nicholas Kruger (EG-F24-085)

PROPOSAL 91

5 AAC 92.003. Hunter education and orientation requirements.

Require all goat hunters to pass an online mountain goat quiz prior to hunting as follows:

Hunters planning to hunt mountain goats in Alaska are required to pass the online mountain goat quiz prior to hunting. https://www.adfg.alaska.gov/index.cfm?adfg=quiz.overview&quiz_id=3

What is the issue you would like the board to address and why? It is well established and accepted that the harvest of nanny's is detrimental to the mountain goat population. According to statistics from ADF&G staff, recent efforts to educate hunters by requiring that they complete a mountain goat gender identity quiz have proven successful in reducing the nanny harvest in those areas. Currently Units 1, 4, 5, 6C and 6D require that hunters complete the Gender Identification quiz found at https://www.adfg.alaska.gov/index.cfm?adfg=quiz.overview&quiz_id=3

There are other areas in the state where there exist mountain goat hunts, both draw and registration, that do not require gender ID education and quiz completion and it is the intention of this proposal to increase the mountain goat gender awareness of hunters by requiring that all registration and draw tags in the state of Alaska include the requirement that the hunter must successfully complete the gender ID quiz prior to hunting. Even in areas like RG480 on Kodiak, where nanny harvest is now required if a second goat is taken, there would be significant benefit to requiring this educational process. It is the hope of this author that this could be a small step in enhancing mountain goat population health and encouraging hunter engagement on goat conservation throughout the state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, I have discussed this with one current and one former ADF&G biologist who are in favor of this proposal and believe that it could be a difference in decreasing nanny harvest.

PROPOSED BY: Paul Forward (EG-F24-094)

Sheep Hunting

PROPOSAL 92

5 AAC 92.003. Hunter education and orientation requirements.

Require sheep hunters to complete an online education course as follows:

Education requirements on Unit 15 moose have shown to reduce sublegal harvest. I suggest developing an educational course and quiz to educate sheep hunters on what a legal ram is and require all sheep hunters to take it.

What is the issue you would like the board to address and why? Currently there is no education to requirements for Dall sheep hunters in Alaska. With the increase in sublegal harvest as available surplus continues to decline, this will have a larger impact on the population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? None

PROPOSED BY: Caleb Martin (EG-F24-035)

PROPOSAL 93

5 AAC 92.171. Sealing of horns and antlers.

Change the sealing requirement for Dall sheep horns from permanent to nonpermanent as follows:

To continue sealing ram horns, the department should mirror the CITES sealing requirements already in place and used for grizzly bears and several furbearers. A plastic seal similar to the CITES seals, can be placed on the skull of harvested rams at the time of sealing. A plastic seal was used on ram horns when sealing was first implemented in 2004.

What is the issue you would like the board to address and why? Repeal the requirement to PERMANENTLY seal (plug) ram horns. There is no scientific or enforcement reason to permanently plug ram horns. I have witnessed several sets of ram horns being permanently disfigured by improper handling during the current process of drilling a hole in the horn and implanting the permanent plug. Several areas in the state require mountain goat sealing and no permanent seal/plug is used during the process to accomplish the same goal of sealing ram horns.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed in coordination with several like-minded sheep hunters.

PROPOSED BY: Jessie Dunshie (HQ-F24-009)

PROPOSAL 94

5 AAC 92.990(30). Definitions.

Change the definition for “full-curl” ram as follows:

A full-curl ram, **whose horn tip of at least one horn, when viewed squarely from the side at right angles to the center of the skull completes, a 360-degree circle.** [WHOSE TIP OF AT LEAST ONE HORN HAS GROWN THROUGH 360-DEGREES OF A CRICLE DESCRIBED BY THE OUTER SURFACE OF THE HORN], as viewed from the side (**figure 1**) [(FIGURE 1)].

What is the issue you would like the board to address and why? Determining full curl legality of Dall sheep rams when field judging or sealing has become far too ambiguous and needs to have a clearer definition that cannot be skewed by different tests and often opinions. This would effectively remove the tube test from a sealing perspective and ensure the hunter is viewing the ram from the correct perspective while in the field. This would simplify the sealing process and still allow for a correct method of using the stick test to establish whether a ram is full-curl or not.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Herb Mansavage (HQ-F24-038)

PROPOSAL 95

5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram as follows:

The proposed regulatory change would repeal the age criteria #3, for a full-curl horn of a male (ram) Dall sheep as follows:

1. The tip of at least one horn has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or
2. Both horn tips are broken; broken means the lamb tip is completely absent; horn tips that are chipped or cracked are not broken if any portion of the lamb tip is present; characteristics of the lamb tip include:
 - (i) a length of less than four inches,
 - (ii) the inside surface of the lamb tip is distinctly concave when compared to the remainder of the horn, and
 - (iii) the lamb tip is the section of a horn that is grown during the first six months of a sheep's life and is the section of horn distal of the first annulus, which is the swelling of the horn that forms during the first winter of life.

3. (THE SHEEP IS AT LEAST EIGHT YEARS OF AGE AS DETERMINED BY HORN GROWTH ANNULI)

What is the issue you would like the board to address and why? Repeal criteria #3 for harvest of Dall Sheep statewide. Current definition of full curl harvest by hunters attempting to count annuli rings has led to misidentification of sub-legal sheep being taken.

Statewide Dall sheep populations are far below historical carrying capacities. Rain on snow events, combined with a late spring in 2012/13, as well as similar conditions in subsequent winters, have decimated multiple cohorts of Dall sheep in most populations statewide.

Many ram groups currently do not have full-curl, or both horns broken horns. Dall sheep hunters that do not see these rams then rely on aging a sheep in the field at a distance. This method can easily lead to miscounting the annuli and result in the take of sublegal young rams. This loss of the very few young recruiting breeding rams is of critical concern to the sustainability of the Dall sheep population's recovery to carrying capacity.

Most hunters and even professional biologists can mistakenly miscount annuli rings on 3/4 and 7/8 curl rams on the mountainside. Many hunters cannot age the sheep when in hand, which can be documented with the high numbers of young rams being seized by the department at sealing. Some sub legal rams are abandoned and not documented as a loss.

Very few rams will not eventually become legal under the full curl definition criteria #1 and #2, by either achieving a full curl, or by breaking off both horn tips if left to mature, so having the aging option is unnecessary and detrimental. At this time, few rams are the true full curl definition 1. and 2. due to hunting or environmental related mortality prior to maturity being reached. It is imperative to retain all recruitment rams to maturity during this unprecedented time.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I am the chairman of the Koyukuk River Advisory Committee. I have discussed the issue with the committee, Regional Councils, and many sheep hunters I encounter. I have discussed the issue with ADF&G staff, and other land management staff.

PROPOSED BY: Jack Reakoff (EG-F24-045)

PROPOSAL 96

5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram as follows:

The proposed regulatory change would repeal the age criteria for a full-curl horn of a male (ram) Dall sheep as follows:

- (A) the tip of at least one horn has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or

- (B) both horn tips are broken; broken means the lamb tip is completely absent; horn tips that are chipped or cracked are not broken if any portion of the lamb tip is present; characteristics of the lamb tip include:
- (i) a length of less than four inches,
 - (ii) the inside surface of the lamb tip is distinctly concave when compared to the remainder of the horn, and
 - (iii) the lamb tip is the section of a horn that is grown during the first six months of a sheep's life and is the section of horn distal of the first annulus, which is the swelling of the horn that forms during the first winter of life.
- (C) [THE SHEEP IS AT LEAST EIGHT YEARS OF AGE AS DETERMINED BY HORN GROWTH ANNULI.]

What is the issue you would like the board to address and why? Statewide Dall sheep populations are far below historical carrying capacities. Rain on snow events in the winter, late springs, and other changing weather patterns have continued to decimate multiple cohorts of Dall sheep statewide.

Many ram groups do not contain animals with full-curl horns or horns that are broomed on both sides. Dall sheep hunters that do not see these rams then rely on aging a sheep in the field at a distance. This method can easily lead to miscounting the annuli which results in the take of sublegal rams. The loss of any animal that is sublegal in a population that is declining statewide is of critical concern to the sustainability of the Dall sheep population's recovery.

Sheep can be difficult to age, and it is not always a cut and dry process even in settings outside of the field, such as when the animal is taken to an ADF&G office to be sealed by department staff and law enforcement officers that have seen hundreds of horns.

The percentage of rams have genetics that will make it so they will not achieve full curl in their lifetime appear to be low. Another viable option for the take of a legal sheep is take one with broomed horns, which is an easier feat then counting annuli rings through a scope. Having the aging option is unnecessary and is detrimental to the recovery of sheep population. If there is a situation where a fully mature sheep is taken in the field that somehow does not meet the full curl or broomed criteria, law enforcement officers can use their discretion on issuing citations during the sealing process.

As sheep populations rebound, this change in regulation can always be reexamined and reversed if it is deemed that the removal of the age criteria has been too unfavorable to sheep hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was not developed with others, although the Eastern Interior Alaska Regional Advisory Council and the Koyukuk River Fish and Game Advisory Committee were aware of its submission.

PROPOSAL 97

5 AAC 92.085 (8). Unlawful methods of taking big game; exceptions.

Lengthen the time period hunters are restricted from using aircraft for hunting sheep as follows:

From August 1-September 20, aircraft may only be used by and for sheep hunters to place and remove hunters and camps, maintain existing camps, and salvage harvested sheep. A person may not use or employ an aircraft to locate sheep or direct hunters to sheep during the open sheep hunting season.

What is the issue you would like the board to address and why? The Board of Game has wisely restricted the use of aircraft to “locate sheep or direct hunters to sheep during the open sheep hunting season”. In the experience of many sheep hunters this has made a very positive impact on the experience of sheep hunting and has created a much more fair chase hunt. This regulation does not, however, account for the fact that there is a youth hunt that starts in many parts of the state on August 1 during which time aircraft could be legally used to locate sheep and direct hunters. This is the antithesis of a fair chase hunt and, if/when this happens we are setting a poor example for young impressionable hunters instead of teaching them the importance of fair chase hunting that creates challenge and adventure.

Furthermore, the author of this proposal has also written a proposal to create an archery sheep season from August 6 – 9 and limiting aerial scouting during that time would be important to maintain the spirit of fair chase for that hunt as well.

It’s also worth noting that officially that the Boone and Crocket Club has the following to say:

“I. Spotting or herding game from the air, followed by landing in its vicinity for the purpose of pursuit and shooting;

With the popularity of personal aircraft in the 1960s increasing and being used for hunting to access remote areas in North America, it became apparent that some hunters were using aircraft not only to reach their hunting destination, but locate their game from the air, and in the vicinity, and pursue for a shot. In some cases, hunters were using aircraft to herd game into a more accessible situation. The Club determined that this was an unfair advantage to both the game and other hunters. At the same time the Club established this policy, some states and provinces began outlawing the practice and instituting laws prohibiting hunting the same day as flying.”

Spotting game from the air prior to harvest is clearly a violation of the basic principles of fair chase and pushing back the date for which Alaska permits this would be acting in a way consistent with fair chase and ethical hunting. Even for areas without youth hunts, pushing back the aerial scouting prohibition to the August 1 would decrease the amount number of hunters who fly to their intended

hunting areas in the couple of days prior to August 10 and then locate sheep, land near them by the 9th and subsequently kill them. Anyone who has spent extensive time in sheep terrain has seen examples of this style of “hunting”.

In the past some of the opposition to the exiting aerial scouting ban from August 10 – September 20 have complained that there is increased aviation hazard during the days immediately prior to August 10 because it’s the only time hunters have to locate sheep and move hunters into position. (There are also limited pilot position reports during that period because of the intent to keep sheep hunting locations secret.) If the period was pushed back to August 1, this would potentially create a safer situation because pilots would only be flying directly to predetermined sites to drop hunters instead the low and circuitous flying that has been cited as hazard if several pilots are doing it in the same area. This proposal could potentially decrease aviation hazard during sheep season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I discussed this proposal with several ADF&G biologists who agree with the spirit and sentiment of the proposal.

PROPOSED BY: Paul Forward (EG-F24-093)

PROPOSAL 98

5 AAC. 92.085 (8). Unlawful methods of taking big game; exceptions.

Lengthen the time period hunters are restricted from using aircraft for hunting sheep as follows:

From August 1 - October 15, aircraft may only be used by and for sheep hunters to place and remove hunters and camps, maintain existing camps, and salvage harvested sheep. A person may not use or employ an aircraft to locate sheep or direct hunters to sheep during the open sheep hunting season.

What is the issue you would like the board to address and why? Aerial scouting for Dall sheep is currently allowed outside of the general season Dall sheep season of August 10 - September 20. Currently all youth hunts and some archery hunts fall outside of these general season dates and therefore aerial scouting during those seasons is allowed. Dall sheep populations are in decline. Restrictions on all aerial scouting during all open seasons will reduce pressure on sheep.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-077)

PROPOSAL 99

5 AAC 92.085 (8). Unlawful methods of taking game.

Shorten the time period hunters are restricted from using aircraft for hunting sheep, and modify the use of aircraft restrictions as follows:

My solution is to change the length of the restrictions and modify them after the first 11 days of the season as follows:

(8) From August 10th through August 20th [SEPTEMBER 20th] aircraft may not be used by and for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during THIS PART OF the open sheep hunting season, however, aircraft other than helicopters may be used by and for sheep hunters to place and remove hunters and camps, maintain existing camps, and salvage harvested sheep DURING THIS PERIOD. From August 21st through September 20th aircraft cannot intentionally approach any closer than 1500 feet or 500 yards from any sheep for the purpose of hunting them.

What is the issue you would like the board to address and why? I think the aircraft restrictions in 5 AAC 92.085 (8) are too long and overly restrictive and should be shortened and modified.

This regulation has been in place since 2015 and restricts anyone from using an aircraft to intentionally spot ANY sheep from ANY distance from the air during the entire general season, August 10th to September 20th for the purpose of hunting them. Most of the public thinks you can not even fly in sheep country during the open season under this regulation and resident hunters with their own airplanes fear being turned in to the troopers and don't even attempt to hunt later in the season because of it. Most of the sheep guides were adamantly against this regulation at first but changed their minds after they realized it had basically eliminated resident hunters after the first 10 days of the season. This was a board generated proposal that they said was to stop people from buzzing sheep and disrupting other sheep hunters hunts but it went way beyond that. It needs to be changed.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this change and language myself.

PROPOSED BY: Dan Montgomery (EG-F24-076)

Note: Proposed amendments to 5 AAC 85.055, including changing hunts to drawing permit hunts and changing seasons and bag limits for Dall sheep, are outside the scope of the Statewide Regulations meeting.

PROPOSAL 100

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.

Limit nonresident sheep hunting opportunity statewide so that nonresidents do not harvest more than 35 percent of total sheep harvest from any game management subunit as follows:

Regulatory Changes this Proposal Requests

The solution we seek with this proposal is to limit nonresident sheep hunting opportunity statewide in a manner **whereby nonresidents do not harvest more than 35 percent of the total sheep harvest from any game management subunit**. Such a harvest allocation is more than fair to nonresidents. If nonresident sheep harvest exceeds 35 percent of the total harvest in any one area, that area's allocation of permits shall be reduced. We did not suggest specific allocations for several units listed below, leaving that to the board to best determine based on Department of Fish and Game nonresident sheep harvest data.

If the allocation remains an up-to number, the department will need direction and guidance from the board as to a starting point and when a higher number of permits should be awarded.

Please note, for multiple subunits listed together, the suggested up-to number of permits is for each individual subunit.

Unit 7 Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 2 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 11

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 12 Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 13A, 13B Remainder, 13C Remainder, 13D Remainder, 13E

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 14A Remainder, 14B

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 15 Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 2 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 16

Nonresident

One ram with full curl horn or larger

Aug 10 – Sept 20

every four regulatory years by permit;
up to X number of permits may be issued

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 19A, 19B, 19D, 19E

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 19C

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to 15 permits may be issued

Aug 10 – Sept 20

[NO OPEN SEASON]

Unit 20 Remainder

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to 20 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 24A within the Dalton Highway Corridor Management Area

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to 10 permits may be issued

Aug 10 – Sept 20
[AUG 10 – OCT 5]

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 24A Remainder, 24B Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 25A east of the middle fork of the Chandalar River, excluding the Eastern Brooks Range Management Area

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 25A within the Dalton Highway Corridor Management Area

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

**Aug 10 – Sept 20
[AUG 10 – OCT 5]**

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 25B, 25C.25D

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 26A east of and including the Etivluk River drainage, excluding Gates of the Arctic National Park, and Unit 26C

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 26B within the Dalton Highway Corridor Management Area

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

**Aug 10 – Sept 20
[AUG 10 – OCT 5]**

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

What is the issue you would like the board to address and why? Unlimited nonresident sheep hunting opportunity in many units, conservation concerns, conflicts and crowding.

Problem Statement

The Board of Game (board) *has known for a long time* that unlimited nonresident sheep hunting in certain areas causes crowding and conflicts and leads to nonresident guided sheep hunters taking the majority of the sheep harvest each year.

But the board, while acknowledging these problems, has continually refused to limit nonresident sheep hunters in the known problem areas to draw-only permits – as Resident Hunters of Alaska (RHAK) has proposed each cycle – using the rationale that nonresident draw permits with limited allocations “don’t provide stability to guide businesses.”

In 2023, after nonresident guided sheep hunters took 90 percent of the sheep harvest in Unit 19C the previous year from a severely declining sheep population, the board completely closed all nonresident sheep hunting in the subunit for five years due to sheep conservation concerns. For some reason the board preferred a complete closure to nonresident sheep hunters – which shuts down all guided sheep hunting businesses in the area – over limiting nonresident sheep hunters.

The board believes the best, and thus, *only* solution to unlimited nonresident sheep hunting opportunity *that the board itself allows* is to limit the number of guides on state lands. The real problem, according to the board, is not too many nonresident sheep hunters who are required to be guided; it's too many guides, and the solution is a convoluted and expensive Guide Concession Program (GCP) on state lands that would ostensibly limit guides and in turn limit the number of their nonresident clients and harvests.

The board has pursued and supported a GCP as the only solution to the known problems for over a decade, but such a program requires legislative action and approval. During the 28th legislative session in 2014, a bill was introduced (SB 160) to create a GCP on state lands where most all these problems occur, but it had a million-dollar fiscal note and other issues and never even made it out of committee. After that failure the board continued to do nothing to limit nonresident sheep hunters and kept pushing for another bite at the apple. A similar bill was introduced in 2024 during the current (at time of this writing) 33rd legislative session in both chambers (SB 253/HB 396), with a smaller half-million-dollar fiscal note, that would put the Department of Natural Resources (DNR), a land management agency, in control of a Guide Concession Program on state lands to regulate the number of guides and determine which guides win exclusive concessions. At the time this proposal is being drafted, with two weeks left in the legislative session, those bills are not expected to go anywhere.

For nearly 20 years now, the board has been aware of the known problems they have created by allowing unlimited nonresident sheep hunting opportunity in certain areas but has kicked the can down the road on using their authority to limit nonresident sheep hunters.

This proposal asks the board to do the right thing now and put all nonresident sheep hunters in areas where they are not currently limited on draw permits with a limited allocation. The board could put a sunset clause on any new limits on nonresident sheep hunters, whereby should a GCP pass the legislature and be incorporated in these areas, those regulations are voided. But it's highly likely that any limits placed on nonresident sheep hunters in specific areas via a draw permit system would be the same or similar to the limits on guided hunters imposed by a GCP. The board could also stipulate that the number of permits awarded can be reviewed in cycle for that region if sheep populations rebound.

RHAK's Overall Objective with this Proposal

Our main objective is to ensure our Dall sheep populations are managed sustainably with an emphasis on protecting future resident general sheep hunting opportunities. This should also be the primary objective of the board. Our secondary objective is to reduce the crowding and conflicts and ensure nonresident sheep hunters retain *some* sheep hunting opportunities, rather than having their opportunity completely shut down in individual units.

Unlimited nonresident sheep hunting opportunity should never be allowed anywhere in the state, regardless of if it leads to sheep conservation concerns, simply because we know the problems that creates in the field that also lead to excessive nonresident harvests.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Resident Hunters of Alaska (RHAK) (HQ-F24-041)

PROPOSAL 101

5 AAC 92.106. Intensive management of identified big game prey populations.

Add sheep to the list of species identified as important for providing high levels of human consumptive use as follows:

5 AAC 92.106. Intensive management of identified big game prey populations.

For purposes of implementing AS 16.05.255(e) - (g), the Board of Game (board) will

(1) consider the following criteria when identifying big game prey populations that are important for providing high levels of human consumptive use:

(A) harvest size: the average annual historic human harvest meets or exceeds values as follows:

- (i) caribou: 100;
- (ii) deer: 500;
- (iii) moose: 100;
- (iv) sheep: XX;**

What is the issue you would like the board to address and why? The Board of Game (board) and Department of Fish and Game have received numerous requests to take action to benefit sheep populations that have declined across the state. Currently, sheep are not an intensive management (IM) species.

The Legislature tasked the board in statute (AS 16.05.258(e)-(g)) with adopting regulations to provide for IM programs to restore the abundance or productivity of big game prey populations the board has identified as necessary to achieve the human consumptive use goals established by the board in regulation. While there are other statutes that specify a particular species, AS 16.05.258 only speaks to big game prey populations providing the board with the ability to determine which species qualify under AS 16.05.258. To further clarify the duties of the board, the Legislature tasked the board with identifying prey populations that are important for providing high levels of human consumptive use, and the board has set an average annual historic human harvest size for the three current IM species (caribou, deer, and moose). The board then created regulations, for the purposes of implementing AS 16.05.258(e)-(g), identifying specific big game prey populations or portions of populations as important for providing high levels of harvest for human consumptive use, and to establish the population objectives and harvest objectives for those populations.

AS 16.05.258(e)-(g) allows for both predator and habitat management to restore big game prey population abundance. Regulations adopted by the board under that statute are specific to each

population and can include a mix of varying degrees of both predator control and habitat enhancement.

Both the board and department have received significant input on the question of designating Dall's sheep as an IM species. This proposal is an opportunity for the board, advisory committees, the public, and the department to have robust discussions and deliberations on this subject. If adopted, this proposal is the first step in a very long public regulatory process to allow IM of Dall's sheep populations and does not guarantee sheep will be intensively managed if it is adopted. If adopted, the next steps will be for the board to evaluate populations to determine if there is a positive IM finding for a given population, and if so, to establish population and harvest objectives which is typically done at the regularly scheduled board meetings for the regions where the populations are located.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F24-083)

Unit 19C Sheep Hunting

Proposal 102 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 76.

PROPOSAL 102

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

Reopen all Unit 19C sheep hunts as follows:

Full curl management is the best option biologically for Dall sheep management supported by our ADF&G biologist. I propose that the Board of Game (BOG) reinstates the subsistence sheep hunt as previously allowed. As well as reinstate a nonresident hunt of one ram every four regulatory years with hunt dates of 8/15-9/10 annually.

What is the issue you would like the board to address and why? The nonresident and subsistence season for Dall sheep in Unit 19C. Dall sheep have been shown to be on cyclical patterns since the beginning of their study and tracking in Alaska in the 1920s. Full curl management has been implemented since 1992 and this is one of the most conservative approaches to sheep management in the United States that have sheep. This ruling was decided on at a time where Dall sheep were at remarkably similar numbers to their current numbers. We have seen an abundance of sheep in 2003 and 2018 since that time. Biologist support this management strategy and do not support closures. The numbers seen in Unit 19C are paralleled in other units of the state including those in national parks where no hunting is permitted. This is a predator and weather issue much more than it is hunter take. Over the past five years numbers of hunters have declined by 62%, this is resident, nonresident & subsistence hunters. The numbers are reflecting the effort in the field and self regulating already. By closing two user groups down this will send more pressure into other areas of the state and create even more problems. ADF&G studies have shown that the mortality rate of Dall sheep greatly increase after eight years. This population which is legal to hunt is going to die of natural causes and go unused. This eight year old population is also at the end of their competitive mating life. Not managing these animals does not add sheep on the mountains.

PROPOSED BY: Anthony Marchini (EG-F23-268)

Proposal 103 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 77.

PROPOSAL 103

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

Reopen Unit 19C to sheep hunting as follows:

The Board should rescind Proposal 204 as passed in Soldotna.

What is the issue you would like the board to address and why? The Board erred greatly by passing Proposal 204 as amended from the last Board of Game meeting in Soldotna.

I urge the board to rescind its actions on Proposal 204 which was “faulty” on several fronts. Here are a few of the elements which were disregarded:

Board-Generated Proposals

The Board should be receiving proposals from the public, not creating its own proposals that it then passes. This action essentially supersedes the rights of the public and appears to be a conflict of interest since the board can hardly be unbiased as to its very own proposal.

Conservation to Discrimination

The drafting of board-generated Proposal 204, based on emotion and not facts, was written as a self-perceived rescue operation for the sheep of Unit 19C by precluding all hunting for five years. This is so outlandish it clearly has absolutely no basis in fact for its creation, either for the duration or the severity of the proposal. But somewhere along the chronology of the discussion, the conservation motive was cast aside for an arbitrary and capricious substitute precluding only nonresident sheep hunting. There was no legitimate reason to discriminate against nonresidents.

Board of Game Usurps the Commissioner’s Authority to Manage

We can see the first duty of the Commissioner in statute is to manage. So why did the board step in and presume to do so by creating Proposal 204? If there really was a conservation concern, the Commissioner could at any time create an emergency order to modify the harvest. But there wasn’t a conservation concern on the part of the real manager to justify the board’s actions, therefore the Board overstepped its bounds in creating and passing Proposal 204.

Ignores the Economic Wellbeing of the State per AS 16.05.020

In sheep hunting across the state, if you don’t include the sale of Governor’s tags, nonresident sheep hunters contribute about 86% of the sheep hunting revenue that goes to the Fish and Game Fund. Residents contribute 14%. Historically in Unit 19C nonresident hunters contribute 95% of sheep hunter funds going into the Fish and Game Fund. So if the statutes require, in the decisions about how wildlife should be managed, that the “general wellbeing of the economy” be given credence, under what mathematical system would the board exclude the users who pay 95% of sheep hunter revenue in Unit 19C? Before the current weather mediated lower sheep numbers, equal numbers of resident and nonresidents hunted in that unit each year. With the Pittman-Robertson match residents on average over five years brought to the Fish and Game Fund \$18,000 per year while nonresidents contributed \$367,000 annually. Failing to consider the importance of the economic implications of the final outcome of the board’s decision, precluding nonresidents is clearly nothing short of a grievous fiscal error on the part of the board.

Ignores the October Department Sheep Report

In October the board called on the department for a “state of sheep” report. Department staff gave a wonderful and detailed report, and in so doing said straight out the decline in sheep

numbers, where they occur, are weather-driven, AND there is NO CONSERVATION CONCERN. The board apparently failed to hear what everyone else heard from these dedicated department sheep biologists. But the department again sent the same message to the board at the recent Board of Game meeting, and the board appeared to have not heard it. It would be inappropriate if this occurred because the board was so invested in their own proposal (read conflict of interest) that they once more ignored what the experts had to say and acted in contrary to the data provided them (twice). Indeed, if there is no conservation concern as stated by the managers (the department), why did the board act so egregiously by taking matters into its own hands thinking they had the data and scientific knowledge greater than that of the department's experts?

Ignores the Protective Nature of Full Curl

It is widely known and accepted by biologists who have been in the business for several decades that a full curl harvest regime is helpful to the population as a whole in that only the surplus mature rams are harvested. The father of sheep biology, having proved the benefits of full curl, and this work was retested on Dall sheep¹, Testimony was given to the Board of Game that this regime is the most protective to sheep while also keeping the young rams from over stressing at breeding time and wearing themselves out trying to copulate as they would without the presence of mature rams to disincentivize them from acting out. Oddly, in Units 7 and 15 where the sheep situation is much worse off than that in Unit 19C, the board just let full curl ride, but in Unit 19C, a lesser affected area, the board went straight to not letting full curl do its job and instead did the irrational thing by precluding hunters when there was no reason to.

Going Emotional Instead of Relying on The Science

I was told that a retired trooper in the hopes of precluding any sheep hunting in Unit 19C (where his son got a 42" ram a couple years ago) was saying if there are no rams to break trail in the snow for the lambs, the latter would die. If it is true, this story got any traction at all it is a fanciful fabrication. Lambs don't hang out with rams. They stay with their mothers who don't hang out with the rams either. The board must base its decisions on truth and data as shared by the department's experts, not on emotional tales invented to elicit an emotional response.

Ignores the Adaptability of Sheep

Sheep have been in Alaska for thousands of years. And in those years there surely must have been fluctuations in population numbers. We know that parts of Alaska experienced both tropical epochs followed by deep glaciation. Sheep are adaptable. They have probably suffered much worse than things are now in Unit 19C, or even Units 7 and 15. They will be fine. The current low numbers are due to weather events, and they will rebound. Until then there is no reason or any scientific basis to curtail any hunting at this time.

So please rescind what was passed for all the wrong reasons of Proposal

204. Thank you very much.

¹The author provided names of individuals which were redacted as a matter of proposal policy.

Proposal 104 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 78.

PROPOSAL 104

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

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

5 AAC 85.055. Unit 19C Sheep

Nonresident hunters. One ram with full curl horn or larger every four regulatory years.

Harvest ticket. August 10 - September 20 [No open season]

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have shown a cyclical pattern since record keeping began in the 1920s. Per the Alaska Department of Fish & Game (ADF&G) website, “Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.” This cyclical pattern is well documented in the 2022 Board of Game (BOG) Dall’s Sheep Informational Meeting Presentation that was presented by ADF&G. In 1945, 1992 and 2022 were all noticeable downturns in overall sheep populations. In retrospect, an abundance of sheep were observed in 1930, 1968, 2003 and 2018. The department opposes a closure of Dall sheep hunting but remains neutral as to who gets to hunt Dall sheep based on historical trends in Dall sheep populations and the states full curl eight-year-old regulation.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. The harvesting of full curl, eight plus year old rams is just a small fraction of the overall population and the empirical evidence has shown to have no detrimental effects on the overall population. This regulation has allowed the department to have a longer hunting season and provides ample opportunity for all to hunt a full curl ram. Full curl regulation has been the best management tool for 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chances of survival greatly diminish within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Furthermore, harvesting these older rams gives the younger adults, which are in their prime, protection from injury during the rutting season. The full curl eight plus year old ram resource will go unutilized when hunter participation is limited and or restricted. Since the start

of the decline, Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five year period. Why? The short answer is self-regulation. ADF&G records of hunter participation show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts in other areas of the state. A quick search on the ADF&G website indicates that other mountain ranges have seen an increase in sheep hunters since 2018. On the flip side, the five year period leading up to 2018 saw a steady increase in Dall sheep hunter participation due to good numbers of sheep and higher than normal success rates. Hunter participation will rise and fall right along with the rise and fall of Dall sheep populations. The department estimated 40 harvestable rams in Unit 19C for the 2022 season and records show that 27 residents participated in the hunt. Again, the Dall sheep resource will go unutilized by limiting nonresident participation.

If nothing is changed, a harvestable number of rams will go unutilized in Unit 19C. Other units will see a noticeable increase in Dall sheep hunter participation. Not only in guided nonresident hunters but also in second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. On a side note, any Alaska businesses that are related to nonresident sheep hunting will suffer.

PROPOSED BY: Spencer Pape, Seth Kroenke, Jeff Rost, and Jon Burrows (EG-F23-307)

Proposal 105 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 79.

PROPOSAL 105

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

Reopen Unit 19C to nonresident sheep hunters as follows:

Unit 19C Dall Sheep Hunting Season Dates 2024:
Nonresident Hunters: Aug 10 - Sept 20, 2024.

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting opportunity within Unit 19C.

Dall sheep management in Alaska has been successfully conducted for several decades by utilizing the “Full Curl” concept of management which recognizes that harvest of older age class rams does not impact overall sheep population trends. This is a long time proven scientific basis that has successfully spanned numerous historical varying Dall sheep population trends, eras, and regions throughout the state without requiring changes to allocation.

Through addressment of an out of cycle proposal (2023 instead of 2024) relative to closing nonresident Dall sheep allocation within Unit 19C, the proposal as passed was emotionally

driven, ignored long term proven scientific management, was out of bounds in relation to the integrity of the process, and hurtful to those who depend upon the scientific driven conservation basis of wildlife management.

By deviating from proven, scientific management guidelines, we have paved the way for utilization of non-science-based action to base similar hunter restriction or elimination efforts within both State and Federal wildlife management arenas.

Board of Game (BOG) decisions turning away from Dall sheep full curl management will lead to similar requests relative to moose management by antler restrictions.

If it is not broken, don't fix it. Do not open Pandora's Box of curses. Full curl management and antler restrictions work.

Elimination of allocation without proven science and ignoring proven science to take away livelihoods generates unneeded disrespect for the BOG process. How can any professional guide service provider try to build viability and sustainability within a conservation based operating basis, not live in fear of BOG actions. This type of action generates unneeded disrespect for the process.

BOG action taking away nonresident hunter allocation, will not affect the Dall's sheep population trend within Unit 19C.

ADF&G Department of Wildlife Conservation staff provided the BOG solid data that Dall sheep management by full curl guidelines works. The BOG chose to differ from known and proven science by eliminating nonresident allocation within Unit 19C.

Professional guides would have a few hunters according to viable opportunity, the dreams of their clients would be intact, local businesses would have continued to have revenue, resident hunters would have opportunity and all of us should have turned together to focus on initiatives that would actually help our wild sheep.

The Alaska Board of Game and Big Game Commercial Services Board have a liaison position which was developed for situations that need addressed by both entities. That position should be encouraged to bring

concerns relative to conservation trends for distribution to professional service providers who operate within the regions and species of concern. This position was designed to help buffer conservation and allocation concerns and should be encouraged.

Respectfully Submitted

PROPOSED BY: Taiga Resources Conservation

(EG-F23-310)

Proposal 106 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 80.

PROPOSAL 106

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

Reopen sheep hunting in Unit 19C to nonresidents as follows:

What solution do you recommend?

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

5 AAC 85.055. Unit 19C Sheep

Nonresident hunters. One ram with full curl horn or larger every four regulatory years. Harvest ticket. **August 10 - September 20** [No open season]

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have a cyclical pattern observed since the 1920s when record keeping began.

I quote, from Alaska Department of Fish and Game (ADF&G) website, “Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.”

The cyclical pattern has been documented in the 2022 Board of Game (BOG) Dall Sheep Informational Meeting Presentation presented by ADF&G. In 1945, 1992 and 2022 displayed noticeable downturns in overall sheep populations. While an abundance of sheep were observed in 1930, 1968, 2003 and 2018. Primarily due to weather events.

The board adopted the full curl regulation in 1992. This is one of the most conservative approaches to Dall sheep management. Limiting harvest to full curl, eight plus year old rams, which are a small percentage of the overall sheep population has been proven to have no detrimental effects on population. Even compared to National Parks in Unit 19C where hunting is not allowed. Full curl regulation has been the standard management tool for 30 years protecting our sheep herds from overharvest while allowing all users opportunity to hunt.

Department studies show once a ram is more than eight years, chances of survival are much lower. Very few rams survive beyond 12 years. Full curl, eight plus year old rams’ constitute less than 5% of the total sheep population. The harvesting these older rams eight years + has shown no negative impacts on sheep populations. Taking older rams out of the herd gives the younger sheep

less risk of injury during the rutting season and less grazing competition. Resulting in better chance of breeding age rams surviving a difficult winter.

Unit 19C recently has seen a large decline in hunter participation

During the 2018 season, Unit19C saw a record number of 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. In a 5-year period there was a 62% decline in sheep hunters. Hunters tend to self-regulate as game populations cycle leading to fewer hunters. ADF&G records of hunter participation show when game populations are low, fewer hunters hunt that area. Dall sheep hunter participation in Unit 19C represents these trends. The sheep population declined, success rates were lower, sheep hunters moved to other areas. ADF&G website indicates other units with sheep populations have increased in hunter participation since 2018. In Unit 19C the five year period leading up to 2018 there was an increase in Dall sheep hunters due to good numbers of sheep and above historical success rates. These trends show hunter participation follows the cyclic nature of Dall sheep populations. An ADF&G estimated 40 harvestable rams in Unit19C for the 2022 season, 27 residents participated in the hunt. By closing the nonresident season the Board of Game went against ADF&G opposing the proposal to close the season for five years. This shuts out an entire user group. Following the data this will move sheep hunters to other areas of the state while there is an opportunity for harvestable rams in Unit 19C.

If nothing is changed:

Other units will see a noticeable increase in Dall sheep hunter participation many of which are showing the same decline due to winter events as Unit 19C. From guided nonresident hunters, second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. Creating additional competition amongst user groups in these areas. All while harvestable mature rams will be available the to hunt is lost for three **(yes 3)** user groups.

Alaska businesses that are related to nonresident sheep hunting will suffer:

1. Loss of revenue
2. Loss of jobs
3. Loss of license monies and associated Pittman-Robertson match funds
4. Land use permit monies
5. Potential business closures by commercial operators

All from an adopted proposal unsupported by our professional biologists at the Alaska Department of Fish and Game.

PROPOSED BY: Jeff Pralle

(EG-F23-275)

Proposal 107 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 81.

PROPOSAL 107

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

Reestablish seasons and bag limits for sheep hunting in Unit 19C as follows:

I don't have access to the new language passed by the board in March. My ideal suggestion would be for two members of the board call a meeting to delay implementation of this action for one year pending better data. Failing that, the seasons and bag limits for Unit 19C should be reestablished for the 2024 season.

END NOTE: The practice of board-generated or board amended proposals is not clearly permitted in Alaska Statute or regulations. Just where the idea arose is uncertain, but it seems to have come along when former ADF&G biologists (who were accustomed to being managers) began to serve on the Board of Game.

Complicating the issue is the underlying confusion between “management” and “allocation.” management has to comply with the Alaska Constitution and statutes. However, “management” can be effectively altered or truncated by regulation. There is little safeguard against this eventuality. If the Board of Game cannot tease this confusion out satisfactorily with the actual manager of record, the Commissioner’s Office/department, it would be rational for the legislature to provide more direct guidance. That process is presently being debated for the “Area M” commercial fishery via HB 128.

When the Board of Game makes its own proposal for regulatory change where the manager has not been substantively involved, then subsequently amends the proposal in deliberation (with no opportunity for public comment), and the final board vote is apparently swayed by emotional appeal. The optics (whether procedurally allowable or not) are not good.

What is the issue you would like the board to address and why? The recent board action banning nonresident Dall ram hunting in Unit 19C should be rescinded or delayed. I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

BIOLOGY AND MANAGEMENT:

1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today’s declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.
2. This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.

3. Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.
4. The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.

PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)

1. The apparent declines in Dall sheep populations have lead to the *intuitive assumption* that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.
2. Sufficient concern over these *intuitive assumptions* was expressed to the Board of Game that it requested an informational meeting with Alaska’s Dall sheep biologists and managers about the status of Dall sheep research and management last October.
 - a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner’s Office through the Department of Fish and Game. According to the established statutes, the Commissioner’s Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.
3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.
4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.
5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.
6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board- generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.
7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted.
 - a. At this time, the total input from the “generating board” is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.
8. Subsequently, the board met in mid March to consider the board-generated proposal to close all

Dall sheep in Unit 19C for five years.

9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass.
 - a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim.
 - i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK's request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.
10. In an apparent effort to garner more board support (votes) for the (his or the Board's?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting.
 - a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.
11. The board approved the amendment, and moved to consider the amended proposal.
12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.
13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote margin.
 - a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.
14. As things stand at present, nonresident participation in mature Dall ram harvesting is scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt. are still allowed by regulation.

PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,
 - “ . . . the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner's Office.
 - a. Alaska law (**AS 16. ARTICLE 1. Sec. 16.05.010.**

Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME) says “The commissioner is the principle executive officer of the Department of Fish

and Game.”

2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the . . . game resources of the state in the interest of the economy and general well-being of the state.”
 - a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner’s obligation and authority to manage in the best interests of Alaska’s economy.
 1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.
 2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”
 - a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.
 - b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.
3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says: “. . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”
 - a. If use isn’t maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident- free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

PROPOSED BY: Wayne Heimer

(EG-F23-266)

Proposal 108 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 82.

PROPOSAL 108

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

Change nonresident sheep hunting in Unit 19C as follows:

**Unit 19C
Nonresident Hunters**

One ram with full curl horn or larger by drawing permit only, every four regulatory years; up to 10 permits may be issued
[ONE RAM WITH FULL CURL HORN
OR LARGER, EVERY FOUR REGULATORY YEARS]

Aug 10 – Sept 20

Alternatively, the board could use a percentage of the estimated harvestable surplus of legal rams to allocate draw permits to nonresidents, as follows:

**Unit 19C
Nonresident Hunters**

One ram with full curl horn or larger by drawing permit only, every four regulatory years; the number of permits issued may be up to 25 percent of the estimated harvestable surplus of sheep.
[ONE RAM WITH FULL CURL HORN
OR LARGER, EVERY FOUR REGULATORY YEARS]

Aug 10 – Sept 20

Note: The Department states that there is currently a harvestable surplus of 30 legal rams in Unit 19C.

What is the issue you would like the board to address and why? Since our formation in 2016, Resident Hunters of Alaska (RHAK) has been submitting proposals (all voted down) to limit nonresident sheep hunters in Unit 19C, based on sheep conservation concerns and fears residents would lose general sheep hunting opportunities if nonresidents were not limited. For over a decade, unlimited nonresident sheep hunters have taken nearly 80 percent of the annual ram harvest in Unit 19C. In RY 2020, the department closed the winter subsistence sheep hunt based on biological concerns for the sheep population, but the board did not act as required to place any restrictions on the general hunt. The sheep population continued to decline and in 2022 nonresident sheep hunters took 90 percent of the harvest of a significantly reduced sheep population.

Our concerns and fears were realized when the board, after years of implying that unlimited sheep hunting opportunity under full-curl harvest management was sustainable, submitted their own board-generated Proposal 204 out of cycle for the 2023 Region II (Southcentral) meeting to completely close all sheep hunting in Unit 19C for five years for everyone, based on conservation concerns for the sheep population.

Proposal 204 was amended to close Unit 19C sheep hunting only for nonresidents for five years and passed by a 4-3 vote.

RHAK has never sought to eliminate nonresident sheep hunters, and had the board taken action in previous years to limit nonresident sheep hunters, this complete nonresident sheep hunting closure in Unit 19C would not have been necessary and would not had such an impact on guides and their clients who already had hunts booked, as well as impacts to department revenues from the loss of income from the sale of nonresident hunting licenses and sheep tags.

This proposal is being drafted after the board decision in March of 2023 to close Unit 19C to all nonresident sheep hunting for five years, recognizing that there will likely be proposals submitted for the Region III (Interior and Eastern Arctic) meeting in 2024 to open the nonresident sheep hunt earlier.

We could support a nonresident opening prior to 2028 if nonresident sheep hunters were put on a draw permit system now with a limited allocation of permits.

PROPOSED BY: Resident Hunters of Alaska (HQ-F23-015)

Proposal 109 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 83.

PROPOSAL 109

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

Reopen sheep hunting in Unit 19C to nonresidents, by bow and arrow only, as follows:

Reinstate nonresident Dall sheep hunting in Unit 19 but by bow and arrow only as follows:

Unit 19

Nonresidents

BAG LIMIT: ONE RAM WITH FULL-CURL HORN OR LARGER EVERY 4 REGULATORY YEARS BY BOW AND ARROW ONLY

SEASON DATES: AUG 10 - SEPT 20

[No open season]

What is the issue you would like the board to address and why? I believe a solution to

continue nonresident sheep hunting opportunity while also reducing the take would be to allow hunting by bow and arrow only. The Board of Game recently closed sheep hunting to nonresidents in Unit 19 due to perceived ideas of hunter impact by locals. The department evidence did not support that nonresident sheep hunters who were limited to one full curl ram every four years, were the reason for sheep population decline in Unit 19. The department cited that weather was the driving factor in the sheep decline. I feel that taking away hunting opportunity in this case is not solving anything and is also potentially hurting outfitters in the area for no good reason.

Bringing back the nonresident season, but limiting the take to bow and arrow only would accomplish three things. First, it would bring back the opportunity to pursue mature rams and allow guides to continue offering sheep hunts. Second, the take would be extremely minimal due to the challenges of hunting sheep with archery equipment, therefore accomplishing the original goal of limiting harvest numbers. Third, this would be a great opportunity to build a record and data of how bowhunting can be used as a valuable management tool that can save hunting opportunities while at the same time not making a negative impact on game populations.

This data could also be used to revisit this topic in the next Board of Game cycle for this area.

PROPOSED BY: Mike Harris (EG-F23-299)

Proposal 110 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 84.

PROPOSAL 110

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

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years as follows:

One full-curl or larger ram every two regulatory years for residents. Nonresidents are already at one legal ram every four regulatory years. This places a higher priority on shooting mature aged rams and lessens the chance of a sub legal ram taken by mistake. Rams “close” to legal will be passed over and saved for the next season when they are obviously of age and legal hence giving them at least one more season of mating to help the population.

What is the issue you would like the board to address and why? The harvesting of sublegal rams. While the bulk of the sheep population issue is weather and predator related. An issue that we can help is the taking of sub legal rams. 8 year old, full curl or double broken rams are the statewide professional biologist standard of management. To put more of an emphasis on this and leaving breeding age rams in the population longer therefor putting more sheep on the mountain in the long term. Taking of sub legal or immature rams needs to be placed in a higher priority.

PROPOSED BY: Anthony Marchini (EG-F23-274)

Proposal 111 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 85.

PROPOSAL 111

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

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to eight year old rams, as follows:

Resident hunters in Unit 19C:

Harvest of a ram 8-year-old or older and hunter will be eligible to hunt sheep the next season. Harvest a 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a 6-year-old or younger ram, and the hunter will be ineligible to hunt sheep for the next three seasons.

***If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

What is the issue you would like the board to address and why? In recent years there has been widespread concern raised about the harvesting of young rams during Full-Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska's sheep population has been noted to be on a steady decline and it's time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 during the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines, which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight years-old and if a few old outliers are removed, from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5-years-old with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large

number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Full-Curl Management regulation. Shooting a full curl seven- year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C. I am open to this being adopted region or statewide but have targeted it here to Unit 19C due to recent concerns. Unit 12 would also be a good place to introduce this regulation.

PROPOSED BY: Paul Forward (EG-F23-285)

Proposal 112 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 86.

PROPOSAL 112

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

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to ten year old rams, as follows:

***This is a more conservative version of the other proposal with more conservative age requirements. This is consistent with some of the theories on ram viability put forth by multiple wildlife biologists from Alaska and British Columbia.

Resident hunters in Unit 19C:

Harvest of a ram 10-years-old or older and hunter will be able to sheep hunt again in Alaska the next season.

Harvest of a full-curl or carger ram 8 or 9-year-old, the hunter will be ineligible to hunt sheep for next one season.

Harvest a full-curl or larger but 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a full-curl or larger but 6-year-old or younger ram, the hunter will be ineligible to hunt sheep for the next three seasons.

***If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

What is the issue you would like the board to address and why? In recent years there has been widespread concern raised about the harvesting of young rams during Full Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent

concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska’s sheep population has been noted to be on a steady decline and it’s time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 in at the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight-years-old and if a few old outliers are removed from the approximately 50 or so rams killed when calculating, the average age of a sheep killed is under 7.5 with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Management regulation. Shooting a full-curl seven7-year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C.

PROPOSED BY: Paul Forward (EG-F23-287)

Proposal 113 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 87.

PROPOSAL 113

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

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C as follows:

Unit 19C Resident Dall Sheep General Season: August 15th - September 10th.

Nonresident Dall Sheep Season: August 21st - September 10th.

Youth Hunt Season: None

Subsistence Hunt Season: no recommendations

Bag limit for resident or nonresident: Same as current - one ram that is 8-years-old, broken on both sides, or full-curl or passes the angle or stick test on at least one side.

Methods and Means: General harvest methods.

What is the issue you would like the board to address and why? The Board of Game (BOG) had legitimate conservation concerns about Dall sheep populations in Unit 19C and submitted a board generated proposal for the Southcentral Region Meeting in Soldotna in March of 2023. It would've impacted all user groups equally by closing the season for five years for everyone. They ended up amending the original proposal and passing one that was mostly if not entirely allocative, by closing in entirely to nonresidents and leaving the entire resident season - except for the youth hunt, in place. This caused serious financial losses to many, including the state of Alaska Department of Fish and Game.

PROPOSED BY: Wayne Kubat (EG-F23-322)

Proposal 114 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 88.

PROPOSAL 114

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

Change all sheep hunting in Unit 19C to archery only, and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only as follows:

This proposal would transition all sheep hunting in Unit 19C to **by bow and arrow only**.

Resident: One ram with full-curl horn or larger **by bow and arrow only**.

Nonresident (when/if moratorium ends): One ram with full-curl horn or larger every four regulatory years **by bow and arrow only**.

What is the issue you would like the board to address and why? The purpose of this proposal is to maintain hunting opportunity for resident and nonresident hunters (when/if the moratorium is removed) while decreasing harvest in the Unit 19C sheep population that has felt a dramatic population decrease in recent years. The goal of this proposal is to transition Unit 19C general season sheep hunting to archery only.

Justification:

As our state sheep population continues to decline or remains low, archery can be a very valuable management tool that will maintain opportunity while reducing harvest impact.

During the 2022/2023 Board of Game meeting in Soldotna, a five year moratorium on nonresident hunters (Proposal 204) was passed because of significant concern that the sheep population was decreasing beyond sustainable limits despite Full Curl Management (FCM). While this five year

moratorium will likely substantially decrease harvest, it will also decrease opportunity for nonresident hunters. Going forward, an alternative would be to change Unit 19C to archery only. This will likely have an even more dramatic effect on sheep harvest (archery hunt success rates

for sheep are generally much lower). This will have zero adverse affect on opportunity because anyone who wants to hunt sheep in that area, including nonresidents will still be able to hunt. They will just have to use a bow instead of a rifle.

Of note, the success rate for nonresident hunting in these areas has been as high as 80% over the past five years and is consistently over 40% for resident hunters. These are extremely high success rates, higher than those for many other species in many parts of the state. Transitioning this area to archery hunting would allow for true fair chase hunting with decreased success rates but will maintain opportunity for *anyone* who wants to hunt it (they would just use a bow now). Skilled hunters who know how to pursue and stalk sheep will still kill rams but the overall take will be reduced due the increased difficulty.

***Regarding opportunity: in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and learning to shoot a bow. Those who wish to sheep hunt in Unit 19C who are not already among the thousands of Alaskans who enjoy bowhunting, can easily obtain equipment and proficiency. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks. This change will not adversely affect any hunters opportunity, it will just make the hunt a little more challenging and thereby decrease total harvest.

***Precedent: There are examples, both in and outside Alaska of the success of archery only sheep areas. In In Alaska, DS140/141 and DS240/241, which are bowhunting only draw hunts for any ram in an easily accessible area, the success rate over a ten-year period was about 2–3 rams per year for almost 70 tags awarded each year, and only a small fraction of the rams that were killed in these hunts would be considered legal in a full curl only area. Specifically, in the Eklutna area, where almost 70 hunters per year are allowed to bow hunt for any ram in an easily accessible area, there is still a steady population of mature rams despite all the hunting pressure. This is an example of how archery hunting allows for tremendous amounts of hunting opportunity with minimal impact on the animal population.

Similarly, there are very popular and well accepted hunts in Canada including the Canmore “Bow Zone” and the Todagin Mountain area of British Columbia. Both are over the counter archery sheep hunts that have proven popular with hunters and very affective in expanding hunter opportunity while having minimal harvest affect.

PROPOSED BY: Paul Forward (EG-F23-288)

Proposal 115 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 89.

PROPOSAL 115

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

Reopen the subsistence winter sheep hunts in Unit 19C as follows:

Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)

RS380

Oct. 1-Apr. 30

What is the issue you would like the board to address and why?

Reinstate:

One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323

RS380

Oct. 1-Apr. 30

This hunt was closed at the last Board of Game meeting along with closing the nonresident season against the opposition by Alaska Department of Fish and Game to this proposal of a five year closure to all hunters due to lack of biological reason for a closure. Reopening this hunt will allow local residents without use of aircraft traditional harvest of sheep. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition.

PROPOSED BY: Jeff Pralle (EG-F23-278)

Proposal 116 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 90.

PROPOSAL 116

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

Reopen the late season resident only subsistence sheep registration hunt RS380 in Unit 19C as

follows:

Reinstate RS380 Dall sheep hunt.

5 AAC 85.055 Unit 19C Sheep

Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)

RS380

Oct 1-Apr 30

What is the issue you would like the board to address and why? Reauthorize RS380. One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning September 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323.

The Alaska Department of Fish & Game advised the Board of Game in March of 2023 that there is no biological reason to close this hunt as well as the general season hunt for Dall sheep. Reopening this hunt will allow LOCAL residents to traditionally harvest sheep for subsistence needs. Historical use and harvest of RS380 is low with an average of two sheep taken a year. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition. The low harvest has no detrimental effects on the overall sheep population.

PROPOSED BY: Spencer Pape (EG-F23-300)

Proposal 117 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 91.

PROPOSAL 117

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

Modify sheep hunting opportunity in Unit 19C or other subunits in the western Alaska Range by implementing a sheep management plan as follows:

Unit 19C Sheep Hunting

- Guided nonresident bag limit- *management plan recommendation*
- Non-guided nonresident nag limit- *management plan recommendation*
- Resident nag limit- *management plan recommendation*
- Subsistence hunt bag limit- *management plan recommendation*
- Youth hunt bag limit- *management plan recommendation*

Guided nonresident season- *management plan recommendation*
Non-guided nonresident season- *management plan recommendation*
Resident season- *management plan recommendation* Subsistence season- *management plan recommendation* Youth hunt season- *management plan recommendation*

Sheep hunting Methods and Means-

Guided nonresident- *management plan recommendation*
Non-guided nonresident- *management plan recommendation*
Resident- *management plan recommendation*
Youth hunt- *management plan recommendation*

What is the issue you would like the board to address and why? This proposal is designed to provide a vehicle to address significant weather driven sheep declines in the western Alaska Range. In response to sheep declines the board has closed nonresident sheep hunting only for nonresidents for a period of five years. This closure is only allocative in nature and will not result in positive conservation outcomes for depleted sheep populations in the affected area.

The Alaska Professional Hunters Association (APHA) supports a more holistic and comprehensive approach to sheep management and conservation. The APHA is on record supporting the development of a western Alaska Range sheep management plan that could be limited to Unit 19C or expanded to other Unit subunits in the western Alaska Range. This proposal is designed to be a vehicle to be amended to incorporate the portions of such a plan that require Board of Game action.

PROPOSED BY: Alaska Professional Hunters Association (EG-F23-259)

Proposal 118 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 92.

PROPOSAL 118

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

Close all nonresident sheep hunting in Unit 19 as follows:

Close all nonresident hunts for sheep in Unit 19.

What is the issue you would like the board to address and why? Declining numbers of legal rams in Unit 19. Over hunting plus harvesting of sub legal rams by guided nonresident hunters.

PROPOSED BY: Chris Bouch

(EG-F23-171)

Game Management Unit Boundaries

PROPOSAL 119

5 AAC 92.450. Description of game management units.

Change the boundary between Units 21E and 21D as follows:

5 AAC 92.450

...

(E) Unit 21(E) consists of that portion of Unit 21 in the Yukon River and Arhymot Lake drainages upstream from a line starting at the downriver boundary of Paimiut on the north bank of the Yukon River, then south across the Yukon River to the northern terminus of the Paimiut Portage, then south along the Portage to its intersection with Arhymot Lake, then along the northern and western bank of Arhymot Lake to the outlet at Crooked Creek (locally known as Johnson River) drainage, then to **and including all waters flowing into Honey Moon Slough, and to** but not including, the **Eagle Creek** drainage [BLACKBURN CREEK DRAINAGE], and the Innoko River drainage downstream from the Iditarod River drainage;

What is the issue you would like the board to address and why? Boundary change for Units 21E and 21D. Unit 21D has antler destruction, Unit 21E does not and does not want this restriction on Unit 21E. No other solutions discussed or wanted.

Residents in Grayling are having to travel 120 miles by boat to hunt in their old grounds, the Innoko River near the old Holikachuck Village. Grayling hunters now have to travel 120 miles by boat, if the Yukon, Shageluk Slough does not have enough water for travel, causing hunting issues on Anvik and Holy Cross corporation lands on the Yukon and Lower Innoko Rivers.

Residents of Grayling will be able to hunt the area now in Unit 21D under the permit RM836 if the boundaries are extended.

The GASH AC will have some say in the management of this area in question – trend counts, predator numbers and measures to help control bear and wolf populations.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes. Discussion by the committee was on two occasions, voted yes by all present. The chair was directed to proceed with proposal and have further talks with the area biologist.

Note: The advisory committee submitted maps with this proposal, which are available on the proposal book website at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook.

PROPOSED BY: Grayling/Anvik/Shageluk/Holy Cross (GASH) Fish and Game Advisory Committee (HQ-F24-039)

PROPOSAL 120

5 AAC 92.450. Description of game management units.

Change the boundary between Units 25C and 25D as follows:

Unit 25C: The drainages into the south bank of the Yukon River upstream from Circle to the Unit 20E boundary, the Birch Creek drainage upstream from the Steese Highway bridge (MP 147) and then following the Steese Highway to the northeast staying on the north side of the road from the Steese Bridge at MP 147 to Circle; the Preacher Creek drainage upstream from and including the Rock Creek drainage, and the Beaver Creek drainage upstream from and including the Moose Creek drainage.

What is the issue you would like the board to address and why? This realignment of the 25C/D boundary would reduce confusion on where the boundary is located as you drive between Central and Circle. The suggested fix would move the boundary to the road between Birch Creek and Circle, which would help to know exactly where the game Units start and end.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Amanda Pope

(HQ-F24-011)

PROPOSAL 121

5 AAC 92.450. Description of game management units.

Divide Unit 15C into two subunits as follows:

Unit 15D consists of the current portion of Unit 15C south of Kachemak Bay, Sheep Creek, and the Dinglestadt Glacier.

What is the issue you would like the board to address and why? Divide Unit 15C to create two subunits, 15C and 15D, to align management boundaries with areas of stark physiographic differences of topography, climate, geology, vegetation, and wildlife species distributions and densities.

ADF&G utilizes the USGS Unified Ecoregions of Alaska map to depict Alaska's 32 ecoregions. An ecoregion is defined as "an area of land and water containing vegetation communities that share species and ecological dynamics, environmental conditions, and interactions that are critical for their long-term persistence."

North Unit 15C, overlays the Coast Mountain Boreal; Cook Inlet Basin ecoregion of gently sloping lowlands of lakes, swamps, bogs, and rivers drained from glaciers with an annual snowfall of 63 - 100 inches and total yearly precipitation averaging 15 - 27 inches.

15D (South 15C), would overlay two rugged ecoregions within the distinct Hyper-maritime Forests; the Chugach (Kenai) Mountains Ecoregion, with ice fields, narrow deep gorged valleys; fringed with the Gulf of Alaska Coastal Ecoregion, of deeply carved glacial fjords, archipelagos and short swift streams. Elevations dramatically rise from sea level to over 5,400 feet with a maritime climate. Annual snowfall averages 32 - 236 inches and total precipitation 30 - 160 inches.

Land ownership within the proposed Unit 15D area consists of primarily Kenai National Wildlife Refuge land, Kachemak Bay State Park and Wilderness Park land, and Alaska Native Corporation land.

Kachemak Bay waters and submerged intertidal lands are legislatively designated a State Critical Habitat Area (CHA) for the "perpetuation of fish and wildlife". This CHA overlays Special Purpose Site Park lands and waters located within the proposed Unit 15D.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: N.J. Hillstrand

(HQ-F24-006)

Proxy Hunting

PROPOSAL 122

5 AAC 92.011. Taking of game by proxy.

Allow proxy hunting for plains bison statewide as follows:

- (k) Proxy hunting under this section is only allowed for
 - (1) caribou;
 - (2) deer;
 - (3) moose in Tier II hunts, any-bull hunts, antlered-bull hunts without antler restrictions, and antlerless moose hunts;
 - (4) emperor geese;
 - (5) muskoxen in Tier II hunts; **and**
 - (6) plains bison.**

What is the issue you would like the board to address and why? At the 2024 Interior and Eastern Arctic Region Board of Game meeting in Fairbanks, the board passed a proposal to allow plains bison to be proxy hunted in that region. To reduce regulatory complexity the Department of Fish and Game proposes to allow proxy hunting for plains bison statewide. There are two plains bison populations outside of the Interior and Eastern Arctic Region (the Chitina herd in Unit 11, and the Copper River herd in Units 11 and 13D) and hunting opportunity for these populations is offered by drawing permit only, when a harvestable surplus exists.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-074)

PROPOSAL 123

5 AAC 92.011 (i). Taking of game by proxy.

Allow remuneration to be provided to proxy hunters as follows:

Solution: Remove language:

~~A person may not give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.~~

What is the issue you would like the board to address and why? Remove the language item (i). A person may not give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.

- 1) Irrelevant and outdated regulation that is no longer practiced or required.
- 2) Illegal on state lands but allowed on federal lands.
- 3) Provide more opportunity to meet needs of harvestable resources.

PROPOSED BY: Alissa Nadine Rogers

(EG-F24-008)

Permits for Bear Baiting

PROPOSAL 124

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

Change the term “permanent dwelling” to “permanent domicile” for the purpose of bear baiting as follows:

Change the wording Permanent Dwelling to Permanent Domicile as defined by AS 16.05.940. Definitions.

(11) "domicile" means the true and permanent home of a person from which the person has no present intention of moving and to which the person intends to return whenever the person is away; domicile may be proved by presenting evidence acceptable to the boards of fisheries and game;

You MAY NOT:

• Set up a bait station within 1 mile of a:

»house (including your own home),

»school,

»business,

»developed recreational facility,

»campground, or

»permanent domicile including a seasonally occupied cabin (including your own).

Establishing bait stations within 1 mile of a seasonally occupied cabin is allowed in some areas. (See page 27 for the list of places this is allowed.)

What is the issue you would like the board to address and why? According to the Regulations, a hunter MAY NOT place bait within 1 mile of a Permanent Dwelling. Currently there is no definition of what that is and multiple hunters have been charged for baiting within a mile of abandoned camps, outhouses, squatter cabins or other structures that may not fit the intended definition. This leaves this up to the Interpretation to the officer currently on duty and Hunters have been charged by One officer after having been cleared by others previously.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was brought up originally at the Southcentral Board of Game meeting and law enforcement and many communities members agreed on the need for to clarify this.

PROPOSED BY: Caleb Martin

(EG-F24-033)

The following proposal was deferred by the Board of Game from the March 2023, Southcentral Region meeting. It was previously published as Proposal 144.

PROPOSAL 125

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

Define "developed recreation facility" and "permanent dwelling" for bear baiting in Units 15 and 7 as follows:

I would ask the Board of Game to define “developed recreational facility” as a state-maintained multiuse area that provides services for shooting, launching of watercraft, or camping. It also must include signage and buildings that are regularly maintained for the purpose of recreation.

I would ask the board to define “permanent dwelling” as a structure permanently fixed in place, legally owned by the public or a private individual, and occupied for a minimum of 30 days per year.

What is the issue you would like the board to address and why? Currently for bear baiting in Units 15 and 7 the regulations read:

- 5) a person may not use bait or scent lures within
 - (A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;
 - (B) one mile of a
 - (i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on the opposite side of a major river system, as identified by the department in the permit, from the bear baiting station;
 - (ii) business; or
 - (iii) school; or
 - (C) one mile of a developed campground or developed recreational facility;

There is no definition of what a permanent dwelling or recreational facility is. When I spoke to three different Alaska Wildlife Troopers and multiple ADF&G offices, not only was there different answers, but several officials assumed it was up to the INTERPRETATION of the wildlife officers to determine how to define these areas. I have spoken to many members of the public who have spoken about getting fined or had to prove in court what is, or is not legal when it comes to these areas. One officer may determine a bait site legal, while another may charge a hunter. The regulations currently allow an officer to determine a duck blind, tree stand or any type of structure as a permanent dwelling with no recourse when the courts determine otherwise.

PROPOSED BY: Caleb Martin (EG-F22-130)

Unlawful Methods & Means

PROPOSAL 126

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

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide as follows:

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

(7) with the aid of.....

(E) electronically enhanced night vision; **except that electronically enhanced night vision can be used for taking furbearers;**

(F) any forward looking infrared device; **except that forward looking infrared devices can be used for taking furbearers;**

What is the issue you would like the board to address and why? The Board of Game adopted proposal 52 in March 2024 to allow the use of electronically enhanced night vision and forward looking infrared devices for Region III. This proposal requests the board expand that opportunity to statewide. There is a small but growing number of hunters in other regions that would benefit from the adoption of this request.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was supported by several hunters and will be presented at the next local advisory committee meeting.

PROPOSED BY: Ted Spraker

(EG-F24-040)

PROPOSAL 127

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

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide as follows:

We are proposing 5AAC 92.080(7)(C) artificial light, except that artificial light, night vision goggles, and forward-looking infrared devices may be used:

(I) for the purpose of taking furbearers under a trapping license during an open season November 1 - March 31 in all units.

What is the issue you would like the board to address and why? Make the Region III changes apply statewide. The board discussed, amended and passed this proposal for some units at its recent Region III meeting. This proposal could/should be applied to all units unless there is a unit specific reason not to do so.

The original intent was, and is, to provide more opportunity for harvest when short "daylight" hours restrict opportunity. Adding the use of night vision devices as they are now defined in the regulation for some units to the exceptions under unlawful methods would allow hunters and trappers many more hours each day besides what is defined as "daylight". There are healthy populations of furbearers and the harvest would be sustainable and provide additional "reasonable opportunity" for harvest personal use and subsistence. We anticipate that any additional harvest would not be a conservation issue. This change would be expected to add some burden on the Alaska Wildlife Troopers.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Local committee and discussions with trappers and some Board of Game members.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (EG-F24-054)

PROPOSAL 128

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

Allow the use of night vision and thermal optics taking furbearers statewide as follows:

Proposed solution:

Night vision and thermal optics may be used to take furbearing animals with a trapping license during open trapping seasons in all game management units and sub-units.

What is the issue you would like the board to address and why? The taking of furbearing animals with night vision or thermal devices should be allowed with a trapping license in all game management units not just a select few that was permitted in earlier game review board.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Self-developed.

PROPOSED BY: Don Coatney (EG-F24-039)

PROPOSAL 129

5 AAC 92.085. Unlawful methods of taking game; exceptions

Establish a minimum standard of centerfire rifle cartridges for taking big game as follows:

Legal rifle cartridges for big game must have a barrel bore of at least .25 inches and be chambered to fire a centerfire cartridge of not less than two inches overall length including the bullet which is designed to expand.

What is the issue you would like the board to address and why? I have personally been aware of several moose that were shot and lost after being hit with too small of a caliber rifle. Some were shot several times with .223 rifles. The shooters in some cases said, "They shot an entire AR-15 magazine of ammo but must have missed."

I recovered two moose that a shooter said they must have missed. I had people tell me about shooting a brown bear over "eighteen times with a .223 and then it died slow."

I have spent 16 years summer through fall in rural Alaska. I have heard about the lack of moose-hunting opportunities. The waste of game due to the use of insufficient cartridge size is a significant contributor to the dwindling game populations. A larger cartridge size would reduce the loss of animals significantly. Most state game regulations require a cartridge minimum size for big game hunting. Alaska, having the largest big game animals surely should also establish minimum cartridge sizes.

PROPOSED BY: Robert Hammond (EJ-F23-679)

PROPOSAL 130

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

Establish a minimum standard of centerfire rifle cartridges for taking moose as follows:

A minimum of .243 caliber rifle is required for taking of moose.

What is the issue you would like the board to address and why? We would like an established minimum caliber requirement for moose statewide as follows: Require a minimum of .243 caliber centerfire rifle for the harvest of moose.

Unfortunately, moose are shot with rifles and ammo that inadequate to kill them.

Moose are one of the largest North American big game species and unfortunately, some moose are shot with rifles and ammo that are inadequate to kill them. The common rifle to hunt moose in some parts of the state is the .223 Remington. With the high number of variables, perfect shot placement is not a guarantee every time a trigger is pulled, and often can end in a dead and

unharvested moose with the .223. Because of this, the true number of moose killed is higher than what is reported at harvest, thus negatively impacting the number of moose that can be harvested.

Finally, one of the most common uses of the .223 and other centerfire 22 caliber rifles and smaller in North America is predator/varmint hunting. As a result, a majority of the ammo loaded commercially for the .223 use hollow point or other fragmenting ballistic tip bullets, none of which are made for the deep bone breaking penetration needed to effectively kill moose. Rather, ballistic tip and hollow point bullets so commonly loaded for the .223 are designed to penetrate and explode inside the body of the coyote, fox or other predator/varmint targeted. Frequently, when these types of bullets are used for big game, especially moose, the targeted animal is maimed by a bullet that comes apart before getting adequate penetration to effectively kill the moose.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This is a proposal is by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-018)

PROPOSAL 131

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags be attached to traps and snares as follows:

5 AAC 92.095 should be amended to add a provision stating as follows:

A person may not set a trap or snare unless there is attached to the trap or snare an identification tag. Identification tags must provide either the person's name, or a personal identification number (PIN) registered with the Alaska Department of Fish and Game. The Department will make identities of trappers who register their traps and snares with the Department available to law enforcement, but otherwise keep identities confidential except in circumstances where children or pets are trapped or snared, in which circumstances the identity of the owner of the trap or snare shall be released to the parent of a child caught in a trap or snare, or a pet owner whose pet has been caught in a trap or snare..

What is the issue you would like the board to address and why? The need for identification of illegally set traps and snares to assist law enforcement; and also pet owners and parents whose pets and/or children are caught in traps or snares.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I submitted a similar proposal previously, and law enforcement very strongly supported the proposal when it was considered by the Board of Game at the January 2022 meeting held in Wasilla. I am a member of the Anchorage Advisory Committee and a member of its Game subcommittee, the Anchorage Advisory Committee does not meet again until October 2024, and does not usually submit proposals, I expect the game subcommittee and full advisory committee will support this proposal when we review the proposal book.

PROPOSAL 132

5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit nonresidents from using snowmachines to approach and pursue the take of wolves and wolverine as follows:

Section 5 AAC 92.080 - Unlawful methods of taking game; exceptions.

The following methods of taking game are prohibited:

(4)(B)(ix) **Alaska residents may use** a snowmachine [MAY BE USED] to approach and pursue wolves and wolverine; an approach and pursuit under this sub-subparagraph is not harassment under (5) of this section, but may not come in contact with a live animal;

Limit the trapping methods and means exception to taking of wolves and wolverines by use of a snowmachine to approach and pursue animals to only Alaska residents.

What is the issue you would like the board to address and why? The trapping methods and means exception for use of a snowmachine to approach, pursue and take wolves and wolverines affords nonresident trappers an improper and unfair advantage in the taking of free ranging wolves and wolverines, counter to basic hunter and trapper ethics and contrary to fair chase.

A key reason this trapping methods and means exception was allowed for wolves and wolverines was for subsistence users. As written, the methods and means exception also granted nonresidents in all game management units the legal authority to run wolves and wolverines to exhaustion, which is accepted as an unethical method of taking game. Nonresident hunters and trappers should not be afforded this exception and should be held to basic fair chase principles including taking any free ranging wild game animal in a manner that does not give the hunter an improper or unfair advantage over the game animals. Subsistence methods and means for the take of fish and game often allow an unfair advantage, but such advantages should not be afforded to nonresident users.

What will happen if nothing is done? Nonresidents will continue to be allowed to use a snowmachine to chase wolves and wolverines to exhaustion, counter to basic hunter and trapper ethics.

Who is likely to benefit? Resident trappers

Who is likely to suffer? Nonresident trappers

Other solutions considered? Rescind exception to methods and means to approach and pursue wolves and wolverine by snowmachine to all trappers. I don't believe removing this exception for all trappers is likely to gain much support by subsistence users in rural areas of the state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This has been a topic of conversation in the area since the positioning regulation was adopted. I have received input from other residents and trappers who feel the pursuit of wolverines and wolves by snowmachine is an unethical method of taking game.

PROPOSED BY: Rick Grant (EG-F24-051)

PROPOSAL 133

5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit the use of snowmachines to approach and pursue wolverine as follows:

Section 5 AAC 92.080 - Unlawful methods of taking game; exceptions.

The following methods of taking game are prohibited:

(4)(B)(ix) A snowmachine may be used to approach and pursue wolves [AND WOLVERINE]; an approach and pursuit under this sub-subparagraph is not harassment under (5) of this section, but may not come in contact with a live animal;

What is the issue you would like the board to address and why? Rescind trapping exception in methods and means allowing the approach and pursuit of wolverines by snowmachine. This exception for use of a snowmachine affords trappers an improper and unfair advantage in the taking of wolverines, counter to basic hunter and trapper ethics and contrary to fair chase.

What will happen if nothing is done? Trappers will continue to be allowed to use a snowmachine to chase wolverines to exhaustion, counter to basic hunter and trapper ethics.

Who is likely to benefit? n/a

Who is likely to suffer? Trappers

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This has been a topic of conversation in the area since the positioning regulation was adopted. I have received input from other residents and trappers who feel the pursuit of wolverines by snowmachine is an unethical method of taking game.

PROPOSED BY: Rick Grant (EG-F24-053)

Hunting & Other Permits

PROPOSAL 134

5 AAC 92.069. Special provisions for moose and caribou drawing permit hunts.

Allocate 90% of all moose drawing permits to residents as follows:

Issue 90% of moose drawing permits to Alaska residents.

What is the issue you would like the board to address and why? The issue I'd like to address, on a statewide basis, is the allocation of primary meat animals in drawing hunts as spelled out in 5 AAC 92.069.

Moose drawing permit allocations should reflect food security needs for Alaskan residents. As a primary meat animal, there is no reason to allocate half of the moose in any given draw hunt to outside hunters, many if not most of whom do not want the meat. This is currently in practice, most egregiously in Unit 21B as spelled out in AAC 92.069(b)(3). I'd like the Board of Game to consider, during drawing permit distributions, a more reasonable share of these important subsistence animals: 90% guaranteed to residents of the State of Alaska. Other allocation solutions considered are numbers of 80 or 75 percent, as for caribou in 92.069(c), although I feel these are too low.

I understand the normal rationale for draw hunts; that there are not enough animals to satisfy the demand of a general season hunt. I also understand another rationale for draw hunts; the economic security of commercial users, and also that when hunts go to draw for "trophy" purposes, or to effectively add a new animal to the "must be guided" class as exists in statute, that there are often other opportunities available. One primary problem with this second rationale is that those additional opportunities, on federal land, are weighted to local residents, not equal access to all Alaskans as per state mandate. Another is that all harvesters should be able to use all parts of the animal to meet their needs, be it meat for the freezer, hide for clothing or sewing, or bones and antlers for hardware, handicrafts, decoration, and medicinal use. This is limited in some of those additional opportunities, along with adding onerous reporting and specimen requirements.

In summary, state regulation in 5 AAC 92.069 should be amended to reflect the prevailing guidance of the Alaska Supreme Court (McDowell 1989) and the Constitutional provisions of Alaskans' common use, maximum use, and maximum benefit clauses by the Board of Game using its authority to protect the harvest needs of all Alaskans, prioritized over those of nonresidents of the state, by issuing 90% of moose draw permits to resident Alaskans.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, see above.

PROPOSED BY: Douglas Malone

(EG-F24-065)

PROPOSAL 135

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

Allocate 10% of the big game permits to nonresidents as follows:

Nonresidents shall be guaranteed 10% of the available permits for each hunt as long as a hunt has at least 10 permits. If a hunt has less than 10 permits no nonresident tag will be issued. If the number of nonresident permits is not a round number, it shall be rounded down to the next round number.

This is consistent with most other Western states in the United States. This language shall not apply to hunts already allocated specifically to nonresidents either guided or unguided. In the case of drawing hunts with less than 10 permits the Department of Fish and Game shall have the authority to issue up to one permit specifically for nonresidents granted it does not take a resident permit away to meet the original permit quota. This language, because it would set aside permits for nonresidents would be less restrictive than many western states that allow UP TO 10% of the permits to be allocated to nonresidents.

What is the issue you would like the board to address and why? Nonresident drawing permit allocation is uncapped in many drawing hunts. Currently there are many drawing hunts that have no nonresident allocation limits. Alaska residents are finding it increasingly difficult to draw permits. Nonresident allocations in the lower 48 have been drastically reduced in the last five years resulting in more interest by nonresidents to hunt and apply in Alaska. The current regulations are unit or hunt specific as it relates to nonresident allocation thus making it difficult and cumbersome to address in the usual regional proposal process.

Did you develop your proposal in coordination with others, or with your local fish and game advisory Committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-084)

Note: Alaska Statute 16.05.340 establishes fees for hunting permits.

PROPOSAL 136

5 AAC 92.050. Required permit hunt conditions and procedures.

Limit bison and musk ox drawing permit hunts to once in a lifetime, and only allow applicants to apply once per hunt as follows:

First, make it a lifetime hunt, one and done. Second, get rid of the multiple chance drawings and just increase the price to \$50.00 for a chance. It would still create plenty of revenue and there would be folks still trying to get this fabulous draw.

What is the issue you would like the board to address and why? Since the musk ox and the bison tags are so hard to get; why doesn't the state do two things for the hunters to give them a realistic chance to hunt these animals.

I have been putting in for this draw for 18 years and not successful and yet others have had multiple draws to hunt them. There is also another option to make it a one per household also. I just read today where my co-worker and husband both drew for bison. It is just my opinion but I would like a real chance to get one. Thanks for letting me vent.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We often talk about it at work and with others that I am friends with that share my concerns.

PROPOSED BY: Russel Hawkins (EG-F24-003)

PROPOSAL 137

5 AAC 92.050. Required permit hunt conditions and procedures.

Change the drawing hunt permit process as follows:

Options and alternative strategies to consider either singly or in combination:

1. Increase waiting period(s) by species if successful in harvest and/or draw.
2. Reduce application number by species (e.g., 6 to 4)
3. Restrict applications for one applicant (or party) to maximum of three species per draw application year.
4. Restrict applications to apply for bison OR muskox, caribou OR elk, and/or sheep OR goat per draw application year.
5. Reduce resident bag limit for bison to once-in-a-lifetime if successful in harvest of a bison on a resident draw permit.
6. Increase opportunity for additional registration hunts with quotas where possible as an alternative to draw hunts.

Other options considered:

1. Bonus Point System - previously considered by Board (several different meetings).
2. Create and establish separate draw hunts for longtime applicants - requires tracking applicant history and possibly establishing a "hunter identification number".

Options rejected:

1. Preference Point System - previously considered by Board (same as above).
2. Once-in-a-lifetime drawing with unsuccessful harvest.
3. Long waiting periods for successful moose draw applicants.

What is the issue you would like the board to address and why? The probability of successfully drawing a hunt permit (for most of the current hunts offered) has become exceedingly difficult over the last several years. In 2018, there were 321,126 applications for 8,302 draw permits. Just five years later (2023), there were 373,511 applications for 5,216 draw permits - an overall average

reduction of almost half from 2.6% to 1.4%. The majority of the most desirable draw hunts have seen significant reductions in drawing opportunity. For example, DM410 (antlerless moose) has shown an increase from 2013 to 2023 of 2,628 applications for 75 permits to 8,674 for 100. Similarly, DC590 (caribou) has went from 906 applications for 100 permits (2013) to 9,248 for 100 (2023). Others include DE702 (elk) - 627 applications/8 permits (2013) to 3394 applications/6 permits, DI403 (bison) - 11,320 applications/50 permits to 33,306 applications/60 permits, and DS123 (sheep) - 560 applications/1 permit to 3,127 applications/1 permit.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed in consultation with local hunters interested in improving the opportunity to be successful in the hunt permit drawing. The alternatives were created to stimulate discussion at the Board of Game meeting to encourage action to address the significant reduction in drawing opportunity for the average resident hunter. The local fish and game advisory committee has not consulted at this time nor is aware of this proposal.

PROPOSED BY: Gary Feaster (EG-F24-011)

PROPOSAL 138

5 AAC 92.016. Musk oxen tag fees.

Remove the requirement for a locking tag in subsistence hunts for musk ox as follows:

5 AAC 92.016. Musk oxen tag fees. The resident tag fee for hunting musk oxen by registration permit on Nelson Island and on Nunivak Island is \$25. The Board of Game waives the resident tag [FEE] for subsistence musk oxen hunting.

or

5 AAC 92.016. Musk oxen tag fees. The resident tag fee for hunting musk oxen by registration permit on Nelson Island and on Nunivak Island is \$25. **A resident tag is not required for taking musk oxen in subsistence hunts.** [THE BOARD OF GAME WAIVES THE RESIDENT TAG FEE FOR SUBSISTENCE MUSK OXEN HUNTING.]

What is the issue you would like the board to address and why? The current regulation waives the resident tag fee for hunting musk oxen in subsistence hunts yet still requires the hunter to have the locking tag in their possession and to lock it onto the portion of the animal required to be salvaged if successful. AS 16.05.340(a)(16)(B) allows the board to reduce or eliminate the resident big game tag and fee for musk oxen for all or a portion of a game management unit. The board waived the tag fee for subsistence hunts but did not waive the tag requirement. The Department of Fish and Game implemented the regulation by telling permit holders the tag is not required, which is technically incorrect. This proposal is an attempt to align the regulation with how the

department is administering the regulation, and in the manner that is the least cumbersome for the hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-084)

Salvage, Sealing & Sale of Game

PROPOSAL 139

5 AAC 92.150. Evidence of sex and identity.

Change the evidence of sex requirements for horned big game animals as follows.

Evidence of sex naturally connected to part of the hindquarter is not required for horned animals (sheep, goat, muskox). Horns are evidence of sex and must be kept with the meat until processed for human consumption. Horns may be transported simultaneously with final load of meat.

What is the issue you would like the board to address and why? Sex organs are not considered edible meat. This adds to more bacterial growth in the field. Heavier pack outs. This is already not required for sheep. Where horns are enough to show evidence of sex, this statute is inconsistent with goats and musk ox.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Bethel advisory committee.

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-017)

PROPOSAL 140

5 AAC 92.150. Evidence of sex and identity.

Eliminate the evidence of sex requirement for big game having bag limits restricted to one sex as follows:

The solution is fairly simple. Stop requiring evidence of sex to be left on big game animals when the hunt is limited to a single sex. When this regulation was put into place, DNA testing was not very common and was cost prohibitive. Today though, for <\$100, a sample of muscle can be submitted to a lab and the sex determined easily and relatively quickly. If the Alaska Wildlife Troopers were suspicious of meat that was claimed to be from a male when in fact was a female the Troopers could take a sample from every single quarter and any other piece of the meat that they felt suspicious of and determine if ALL meat was from the same sex. Further, if the Troopers felt meat came from another male, not associated with the antlers or horns they accompany, they could submit the samples for a single nucleotide polymorphism (SNP) markers analysis. This is a common technique in wildlife forensic science. Simply put, you could use DNA to test if the skull matched the meat.

Regardless of the method used, this genetic testing is much more versatile for troopers in the field and provides much better data than simply leaving a bit of gender identifying tissue on a single hindquarter.

Another factor that could be considered is to change the definition of the evidence of sex to include horns or antlers. Currently only the horns of a Dall sheep are considered as evidence of sex. Ironically, both male and female Dall sheep have horns so it does not make sense for moose antlers to not count as evidence of sex.

Ultimately, this proposal will simplify the hunters responsibility to care for their meat in the field and will not limit the Troopers ability conduct an investigation when suspicious of an illegal activity. The advances in DNA testing make this regulation obsolete.

What is the issue you would like the board to address and why? We would like to address the requirement to leave evidence of sex on moose. There are multiple issues with this regulation that I will mention here.

1. One option is to leave the penis attached to a hind quarter as evidence of sex. When choosing to leave the penis you must cut through the penis to have a section to leave on the hind quarter. When cutting through the penis there is always a small amount of urine that comes out and that comes in contact with your meat. This is less than ideal from a meat care standpoint. The tissue of the penis is one of the first places that bacteria will begin to cause spoilage and this can more easily infiltrate the meat once it is started. This is exacerbated when on a longer hunting trip.
2. The second option is to leave a testicle on a hind quarter. The testicles are connected very loosely by tissue that can be easily torn from the hindquarter once the quarter is removed from the animal and during hanging and transport. Besides the delicate nature of their connection to the meat, the testicle can also be one of the first places to spoil and in turn begin to spoil the meat. Again, this is exacerbated when on a longer hunting trip where the meat care is already difficult. Finally, leaving a testicle on the hind quarter does not allow them to be eaten in camp which is a tradition for many and ultimately ruins the testicle for consumption later on because they spoil faster than the rest of the meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We talked about this at the March Fairbanks Advisory Committee meeting. The committee was in favor of this change as written.

PROPOSED BY: Lance Nelson (EG-F24-013)

PROPOSAL 141

5 AAC 92.135(a). Transfer of possession.

Allow the transfer of possession of game meat and game parts to be captured in a digital video format or on paper as follows:

Amend **5 AAC 92.135(a)** for both permanent (given as a gift) or temporary transfer for the purpose of transport to be conducted electronically via video recording on a smart phone or tablet. This would not replace the paper forms but would also be recognized as an acceptable Transfer of Possession.

Both hunter and recipient would simultaneously record video on their smart phones or tablets. The hunter would state all of the information requested on the paper form: Date, name, hunting license #, address/city/state/zip, species taken, specific parts of the animal being transferred, date of kill, kill location, whether it is a permanent or transport transfer, and the recipient's name and address/city/state/zip.

The hunter and recipient would be able to save the video on their smart phone or tablet as proof of Transfer of Possession. Upon request by law enforcement or an ADF&G official, the video could be reviewed for proper Transfer of Possession.

The ability to video the Transfer of Possession on a smart phone or tablet would provide proof of the Transfer of Possession. Videos on smart phones and tablets are also date & time stamped, which would provide further proof.

The new regulation would now read:

5 AAC 92.135(a) *for both permanent (given as a gift) or temporary transfer for the purpose of transport may be filled out on the paper form provided in the Alaska Hunting Regulations booklet or conducted electronically by video recording on a smart phone or tablet. All information requested on the paper form must be clearly stated and recorded by the Hunter. The Hunter and Recipient shall retain the video as proof of Transfer of Possession.*

What is the issue you would like the board to address and why? To provide a secondary method to the Transfer of Possession of game meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No. I just believe many people have their smart phones or tablets within the field for photos, etc. and that video with audio is much better proof than a piece of paper. It also gives the hunter and recipient a secondary or back-up method to perform the Transfer of Possession should paper forms not be available.

PROPOSED BY: Regg Simon

(EG-F24-004)

PROPOSAL 142

5 AAC 92.031(h). Permit for selling skins, skulls, and trophies.

Allow for the sale of legally harvested big game trophies without a permit as follows:

[(h) A PERSON MAY SELL A LAWFULLY HARVESTED PREPARED BIG GAME TROPHY IF THAT PERSON FIRST OBTAINS A PERMIT FROM THE DEPARTMENT]

What is the issue you would like the board to address and why? Repeal (h). There is no data suggesting that there is an issue with Alaskans selling their big game trophies. Repealing this section would benefit the ADF&G Division of Wildlife Conservation staff.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Russell Knight

(HQ-F24-024)

PROPOSAL 143

5 AAC 92.200. Purchase and sale of game.

Allow for the sale of legally harvested big game trophies without a permit as follows:

- (a) In accordance with AS 16.05.920(a) and 16.50.930(e), the purchase, sale, or barter of game or any part of game is permitted except as provided in this section.
- (b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale:
 - (1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear, and except skulls and hides with claws attached of brown bears harvested in area where the bag limit is two bears per regulatory year by permit issued under 5 AAC 92.031;
 - (2) **except a lawfully harvested big game trophy. [, OR A BLACK BEAR TROPHY OF ANY KIND];**
 - (3) **except a lawfully harvested big game trophy animal** -skull, except [THE -SKULL OF A BLACK BEAR, WOLF, OR WOLVERINE, OR] a horn or antler that is still attached to any part of the skull, **that in not a trophy;**
 - (4) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
 - (5) unsealed marten taken in Units 1 – 7, and 15, or unsealed fisher taken in Units 1 – 5, except as provided in 5 AAC 91.170(a);
 - (6) unsealed beaver taken in Units 1 – 11 and Units 13 – 17;
 - (7) unsealed land otter, lynx, wolf, or wolverine;
 - (8) the meat of big game and small game, except hares and rabbits;
 - (9) the gall bladder of a bear.
- (c) A person may not barter, advertise for barter, or otherwise offer for barter
 - [(1) A BIG GAME TROPHY, OR A BLACK BEAR TROPHY OF ANY KIND;]
 - (2) The antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
 - (3) the gallbladder of a bear.

What is the issue you would like the board to address and why? If 5AAC92.031(h) is repealed. We have suggested amendments to 5 AAC 92.200 The purchase and sale of game. To still allow the sale of trophies without a permit requirement.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Russell Knight (HQ-F24-023)

PROPOSAL 144

5 AAC 92.031. Permit for selling skins, skulls, and trophies.

Shorten the time period from six months to 60 days for taxidermist to obtain a permit to sell unclaimed furs, skins, and trophies as follows:

- (a) A licensed taxidermist may sell unclaimed, finished skin or trophy under a permit issued by the department after the finished skin or trophy has been held unclaimed for [SIX MONTHS,] **60 days**, and after the taxidermist sends notice of intent to sell, by registered mail at least 15 days before the sale, to the last known address of the person who ordered the taxidermy work.

What is the issue you would like the board to address and why? Currently, a taxidermist has to wait SIX months or about 183 days for a customer who fails to pay on time, Before the taxidermist can take lawful steps in possibly recouping cost associated with the commissioned piece. This burdensome and unreasonable to expect a business to operate with such long restrictions in order to receive compensation for finished commissions.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Contacted Precision Taxidermy, Kin’s Taxidermy, B. Bear Tax, Knight’s Taxidermy, Gunsmoke Taxidermy, etc. etc.

PROPOSED BY: Josh Livingston (HQ-F24-046)

Permits for Possessing Live Game (Clean List)

PROPOSAL 145

5 AAC 92.029. Permit for possessing live game.

Add Eurasian Eagle to the list of animals allowed to be possessed in Alaska without a permit as follows:

Add Eurasian Eagle – Owl (Bubo bubo) onto the clean list.

What is the issue you would like the board to address and why? I request that the Eurasian Eagle-Owl (Bubo bubo) be added to the clean list (5 AAC 92.029). Falconers often host educational programs that help positively impact the conservation and public awareness of raptors worldwide. As a falconer in Alaska, I frequently organize and provide educational demonstrations about raptors, including their biology, ecological roles, and conservation. Currently, falconers are prohibited from receiving payment for their presentations with native species of raptors. However, importing and possessing these non-native species would become legal without a permit if the Eurasian Eagle-Owl (Bubo bubo) is added to the clean list. This would enable payment for conservation talks.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Bennett Wong

(EG-F24-092)

PROPOSAL 146

5 AAC 92.029. Permit for possessing live game.

Exempt sterilized cats from the list of species prohibited from being released into the wild as follows:

5 AAC 92.029. Permit for possessing live game.

Exempt sterilized cats from the list of species prohibited from being released into the wild.

What is the issue you would like the board to address and why? Feral cats are impacting communities across the state, and there is broad agreement it's in both their and our best interest to reduce their numbers. They can be disease vectors and predate on local wildlife; their presence can also be distressing for people, all of which is evidenced by this issue having come before the Board of Game several times before. I'm submitting a proposal in support of TNR (Trap-Neuter-Release) practices yet again because of Juneau's growing feral cat problem and my own first-hand experience.

The board permitting the release only of sterilized cats back to the wild would not increase feral cat numbers. It might reduce them. I can say plainly that allowing TNR in Juneau might have helped prevent the establishment of a feral cat colony in my neighborhood, and it certainly would not have made it worse. I have worked with animal control, the local humane society, and at least two vets in town attempting to reduce or limit a nearby cat colony, so I'm familiar with how the prohibition on releasing feral cats directly translates to inaction and a growing problem.

In 2022, the board expressed reluctance to allow the release of strays, citing their quality of life. However, trap-and-euthanize is already allowed, and is not sufficiently addressing the problem on its own. It is also broadly unpalatable to the public, which is always going to limit its efficacy. An open season on cats as deleterious wildlife, another proposal the board has seen before, is not practicable for similar reasons of palatability as well as its numerous undesirable side effects, like hunting pets for sport. In Juneau, there is will and enthusiasm here to see if we can solve this problem humanely, balancing reducing numbers with outright killing.

TNR may not be appropriate for all communities, but allowing this choice to be implemented locally would allow communities to create right-sized solutions for their particular situations. In Juneau, for example, when the shelter is overfull with kittens, stray cats simply go unsterilized (as they can be neither housed nor released). Allowing the release of sterilized cats would allow a spectrum of action, from motivated individuals helping neuter colonies in their neighborhood to a full TNR program.

This is currently illegal, which I clarify because in 2022, the board heard that anyone can trap and neuter stray cats. This is not true; because releasing stray cats is illegal, those who are able to sterilize them cannot and do not do so. More, agencies such as animal control in Juneau undertake enforcement, prohibiting access to traps and veterinary services and threatening trooper action on individuals. This is counter to everyone's goals in reducing feral cat numbers.

The board has heard requests from individuals and the municipality of Anchorage to have this tool made legal. We hear and understand department objections, which previously have been that vaccine boosters cannot be guaranteed, and that high rates of sterilization may be required for TNR to be deeply effective. I also understand the board's reluctance to allow the trapping of an animal if it is to be released back to a life of suffering. Neither of these does anything to reduce feral cat numbers or their suffering. However, TNR is a tool Alaskans have repeatedly asked the board to permit us to try. There is less harm in allowing individual communities to attempt to fund and find their own solutions with this tool than continuing a blanket prohibition that clearly isn't effective enough.

I would support any amendment to regulation that permits implementation of humane TNR practices with whatever surgical language the board feels appropriate to both protect our wildlife and support reduction of feral cats in Alaska. Thank you for your time & service.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have worked with neighbors, community members, the humane society,

and vets in trying to find a solution for feral cat colony in my neighborhood. The proposal is mine, though many referenced in the regulation and weren't familiar with how to change it.

PROPOSED BY: J. Rintala (EG-F24-024)

PROPOSAL 147

5 AAC 92.029. Permit for possessing live game.

Delegate authority from the Board of Game to the Commissioner of the Department of Fish and Game as follows:

The Department of Fish and Game (department) proposes to have the Board of Game (board) utilize statute AS 16.05.270 to delegate its authority to manage 5 AAC 92.029, commonly referred to as the clean list, to the Commissioner.

What is the issue you would like the board to address and why? Delegating authority to the Commissioner would allow the department to evaluate requests for additions to the clean list in a timely manner. For each proposal the board receives to add a species to the clean list, the department conducts a thorough review of the species. If authority is delegated to the commissioner, the department will conduct the same level of review for each request received.

The Governor's office submitted Executive Order 124 to the legislature in 2024 to move AS 16.05.255(a)(8) from the *Regulations of the Board of Game; management requirements* to AS 16.05.050 the *Powers and duties of the commissioner*. Both the House and Senate jointly rejected the executive order. Delegating the authority from the board to the commissioner as proposed is much narrower than the executive order was, and limits the scope to only those species allowed to be possessed without a permit.

This proposal is an opportunity for the board, advisory committees, the public and the department to collaborate on the best ways to meet the requests of the public when it comes to which species should be allowed to be possessed without a permit in this state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-085)

Intensive Management

Note: Conducting management activities and exercising administrative authority to implement intensive management plans are legislatively authorized powers of the Department of Fish and Game and are not regulations subject to the Administrative Procedure Act.

PROPOSAL 148

5 AAC 92.110(e). Control of predation by wolves.

Impose certain conditions on the commissioner's ability to implement an intensive management plan following its adoption by the Board of Game as follows:

Modify and amend 5AAC 92,110(e) to provide as follows: (e) After the board has adopted a predation control implementation plan, the commissioner may, at any time during the period for which the plan is in effect, determine whether to implement the plan: but only (i) if the commissioner finds that the conditions specified in AS 16.05.255(e) apply at that time; and (ii) in the event the commissioner determines to authorize the use of aircraft and/or the taking of wolves from aircraft the same day airborne, the commissioner also finds that the conditions specified in AS 16.05.783(a) apply at that time. Before proceeding with implementation, prior public notice of the commissioner's determination and findings must be given, and the public given the opportunity to comment as provided in the Administrative Procedures Act.

What is the issue you would like the board to address and why? In Unit 15C, and in other units, the Board of Game has avoided the mandatory provisions of Alaska Statutes 16.05.255(e) and AS 16.05.783(a) when approving intensive management plans, apparently relying on representations by the Department of Fish and Game that the intensive management (IM) plan will be inactive until the commissioner implements the IM plan. 5AAC 92.118(c) which was adopted by the Board of Game at its March 2023 meeting, and which provides for intensive management of moose and control of wolves, including aerial and same day airborne taking of wolves, is a good example of a plan where the board appears to have relied on the department's representations that the IM plan would be inactive. The problem is that by approving IM plans intended to be inactive until the Commissioner makes the determination to implement the plan, the Board of Game has been delegating its nondelegable obligations set forth in these two statutes to the commissioner: who can then commence active predator control, including the use of aerial and same-day airborne taking of wolves, in the commissioner's sole discretion, without going through any public process and without providing prior notice to the public, and the opportunity for public comment as provided in the Administrative Procedures Act.

If nothing is done, the violation of the mandatory provisions contained in these two statutes will continue throughout the state. No other solution to this problem is possible; that is with the exception of litigation, which is ongoing at this time, namely April 30,2024. Adoption of this proposal might make most of the substantive issues of that litigation moot.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The Anchorage Advisory Committee doesn't meet again until October, and

ordinarily doesn't make proposals. The undersign is a member of the Anchorage Advisory Committee and is on the Game Subcommittee; and believes that a majority of the Anchorage AC will support this proposal, although there will be dissent and perhaps modifications.

PROPOSED BY: Kneeland Taylor

(EG-F24-064)

Advisory Committee Jurisdiction for Antlerless Moose Hunts

PROPOSAL 149

5 AAC 98.005. Areas of jurisdiction for antlerless moose seasons.

Add the Nushagak and Togiak ACs to the applicable subunits for authorizing antlerless moose hunts, and move the Stony/Holitna AC from the Western Region to the Interior Region as follows:

5 AAC 98.005. Areas of jurisdiction for antlerless moose seasons. (a) For the purpose of implementing AS 16.05.780, antlerless moose seasons require approval by a majority of the active local advisory committees for the affected game management unit or subunit. For the purpose of this section, an "active local advisory committee" is a committee that holds a meeting and acts on the proposal. The following advisory committees as established in 5 AAC 96.021, have jurisdiction over antlerless moose hunts in the units and subunits specified in this section:

...

(3) in the Southwest Region

...

(B) Unit 17: Nushagak, Togiak

(i) committees with represented communities in subunit 17(A): Togiak

(ii) committees with represented communities in subunit 17(B): **Nushagak**

(iii) committees with represented communities in subunit 17(C): Nushagak **and Togiak**

...

(4) in the Western Region

...

(B) Unit 19: Central Kuskokwim[, STONY/HOLITNA]

...

(v) committees with represented communities in subunit 19(E): **None** [STONY/HOLITNA];

...

(6) in the Interior Region

...

(B) Unit 19: McGrath, **Stony/Holitna**

...

(v) committees with represented communities in subunit 19(E): Stony/Holitna

...

What is the issue you would like the board to address and why? The Togiak AC has community

designated seats under 5 AAC 96.021(c) for Manokotak, Togiak and Twin Hills. Manokotak is located in Unit 17C while the other two are located in Unit 17A.

The Nushagak AC has community designated seats for Dillingham, Aleknagik, Togiak, Manokotak, Clarks Point, Koliganek, New Stuyahok, Ekwok, and Portage Creek. All but Koliganek are located in Unit 17C. Koliganek is located in Unit 17B.

In 2019, the Stony/Holitna AC was moved in regulation by the Joint Board from the Western Region ACs to the Interior Region ACs.

This proposal reflects the region change in 2019 for the Stony/Holitna AC. It also adds the Nushagak and Togiak ACs to the applicable subunits under 5 AAC 98.005 which were inadvertently excluded when the regulation was established in 2014.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F24-067)

Reauthorizations for Antlerless Moose Hunts and Brown Bear Tag Fee Exemptions

PROPOSAL 150

5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska as follows:

- (a) A resident tag is not required for taking a brown bear in the following units:

...

- (4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

...

What is the issue you would like the board to address and why? Brown bear tag fee exemptions must be reauthorized annually. Reauthorizing the exemption allows residents who have not purchased the \$25 brown bear tag to take bears opportunistically. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically.

Region III (Interior and Northeast Alaska) brown bear populations are healthy, and harvest is monitored through the brown bear sealing requirement. Reauthorizing all resident brown bear tag fees throughout Region III maintains simpler regulations, provides high resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization includes tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

The Department of Fish and Game estimates that brown bear harvest accounts for less than 6% of the bear population. Harvest is composed primarily of males and is sustainable. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed by adjusting seasons and bag limits. The absence of resident tag fees that were in place prior to 2010 appears to have little effect on net harvest across the region in general.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish & Game

(HQ-F24-050)

PROPOSAL 151

5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

- ...
- (4) Units... 26;
- ...
- (8) Unit 22;
- (9) Unit 23;
- ...
- (13) Unit 18;
- ...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- ...
- (4) Unit 18;
- ...
- (7) Unit 22;
- (8) Unit 23;
- ...
- (10) Unit 26(A).

What is the issue you would like the board to address and why? The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. The department recommends continuing resident tag fee exemptions for the general season and subsistence season hunts in Region V (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 10 years; Unit 22, where the tag fee has been exempted for 20 years; Unit 23, where the tag fee has been exempted for 15 years; and Unit 26A, where the tag fee has been exempted for 10 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for RY2012 and harvest has remained within sustained yield and continues to be similar to the preceding ten-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in

response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements include: 1) registration permit, 2) tag fee exemption, 3) salvaging meat for human consumption, 4) no use of aircraft in Units 22, 23 and 26A, 5) no sealing requirement unless hide and skull are removed from subsistence hunt area, and 6) if sealing is required, the skin of the head and front claws must be removed and retained by ADF&G at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADF&G for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, it is estimated that zero to three bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging less than one bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest is less than five bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between zero and five bears are taken annually by subsistence hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-069)

Proposal 152

5 AAC 085.045(4) Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6(C) as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 moose by drawing permit only; up to 40 permits	Sept. 1-Oct. 31 (General hunt only)	No open season.

for bulls and up to 20 permits for antlerless moose may be issued

or

1 moose by registration permit only;

Nov. 1-Dec. 31

No open season.

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the Board of Game. The department recommends reauthorizing the state antlerless hunt in Unit 6C to achieve the harvest objectives when the federal subsistence hunt is not able to achieve the desired level of harvest.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. Because the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, we have not held the antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as indented if it is needed. Continuation of the antlerless hunts may be necessary to manage population growth and keep it within the limits of what the habitat can support.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-059)

Proposal 153

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

Reauthorize the antlerless moose season in the Twenty mile/Portage/Placer hunt area in Units 7 and 14(C) as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(5)		

...

Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage

RESIDENT HUNTERS:

1 moose by drawing permit only; up to 60 permits for bulls will be issued in combination with nonresident hunts, and up to 70 permits for antlerless moose will be issued

Aug. 20—Oct. 10
(General hunt only)

...

NONRESIDENT HUNTERS:

1 bull by drawing permit only; up to 60 permits for bulls will be issued in combination with resident hunts

Aug. 20—Oct. 10

...

What is the issue you would like the board to address and why? Antlerless moose seasons must be reauthorized annually, and the Department of Fish and Game recommends reauthorizing the antlerless hunt in Units 7 and 14C. The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters and sharp reductions during severe winters. In 2009, antlerless permits were issued for the first time since 2004. The number of permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A November 2023 aerial composition count of moose in the Twentymile, Portage, and Placer river drainages found 176 moose with a bull:cow ratio of 22 bulls per 100 cows and a calf:cow ratio of 21 calves per 100 cows.

The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at an abundance level that reduces the possibility of over-browsing of winter habitat, moose-vehicle collisions, and significant mortality events during severe winters. This hunt, in previous years, has been successful in creating additional moose hunting opportunity with little or no controversy among resource users.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-070)

Proposal 154

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

Reauthorize the antlerless moose seasons in Unit 14(C) as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar. 31 (General hunt only)	Sept 1.—Mar. 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Sept. 30 (General hunt only)	Sept 1.— Sept. 30
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		
Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloading black powder rifle only; up to 50 permits		

may be issued

Unit 14(C), that portion
of the Ship Creek drainage
upstream of the Joint Base
Elmendorf-Richardson (JBER)
Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
--	---	------------------

1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
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...

Remainder of Unit 14(C)

1 moose per regulatory year,
only as follows:

...

1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
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...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually, and the Department of Fish and Game recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population objective (1,500 moose). This population size has been demonstrated to reduce over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and significant mortality events during severe winters. These hunts have also been successful in providing additional moose hunting opportunities in the state's human population center with little or no controversy among resource users.

Moose in Unit 14C are managed intensively for a population objective of 1,500–1,800 moose and an annual harvest objective of 90–270 moose (5AAC 92.108). The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. In 2013, the department estimated that the moose population contained approximately 1,533 moose in Unit 14C based on a combination of population censuses, composition surveys and extrapolation

to areas not surveyed. A combined 2023 aerial composition count of the Joint Base Elmendorf-Richardson Management Area and the Ship Creek drainage found 222 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 9 calves per 100 cows. In 2021, a survey of the same area found a total of 301 moose with ratios of 44 bulls per 100 cows and 20 calves per 100 cows, respectively. The persistent, deep snowpack during the winter of 2022 likely resulted in additional winter mortality and an increase in the late winter energetic demands on pregnant cows, potentially reducing both the bull:cow and calf:cow estimates for the population. However, harvest numbers continue to remain relatively steady, and at this population level, there have been fewer reports of human-moose conflicts and moose-vehicle collisions.

Harvesting cow moose is paramount to maintaining the population at the low end of the objective while providing harvest opportunity.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-071)

Proposal 155

5 AAC 085.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(B), Kalgin Island

1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 20	Aug. 20—Sept. 20
---	------------------	------------------

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the Board of Game. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective.

In response to concerns that the moose population on Kalgin Island had exceeded the island’s carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt

for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective. Antlerless hunts, such as RM572, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat at this time.

During the most recent moose survey, department staff counted 90 moose on Kalgin Island in December 2022. This count is larger than the population objective of 20–40 moose. In the last 10 years, an average of 120 permits were issued for this hunt; of which 89 permittees hunted, with an annual average harvest of 31 moose.

The any moose registration hunt is recommended to provide liberal harvest opportunity on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make over-harvest unlikely.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-060)

Proposal 156

5 AAC 85.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 15C as follows:

This proposal would reauthorize the antlerless moose hunt for the Homer bench (DM549) and the targeted hunt (AM550).

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(C), that portion from the mouth of Deep Creek easterly along the south bank of Deep Creek to N 59° 55.183', W 151° 8.155'; then southeasterly in a straight line to the unnamed

creek at N 59° 54.342',
W 151° 6.459'; and easterly down
the south bank of this stream to
Caribou Lake and easterly along
the south shore to the outlet of Fox
Creek, then south along the west
bank of Fox Creek to the mouth of
Fox Creek, and along the mean
high tide line to the point of origin

RESIDENT HUNTERS:

...

1 antlerless moose by drawing
permit only; the taking of
calves, and females accompa-
nied by calves, is prohibited;
up to 100 permits may be issued in
combination with the nonresident
drawing hunt: or

Oct. 20—Nov. 20

...

1 moose by targeted permit only; Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing
permit only; the taking of
calves, and females accompa-
nied by calves, is prohibited;
up to 100 permits may be issued in
combination with the resident
drawing hunt

Oct. 20—Nov. 20

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only Oct. 15—Mar. 31

...

What is the issue you would like the board to address and why? Antlerless moose seasons must be reauthorized annually, and the Department of Fish and Game recommends reauthorization of the Homer bench hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in Unit 15C for the 2023-24 hunting season.

In February 2023, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in a population estimate of 5,162 moose (95% CI: range 3,934–6,390), of which 22% (95% CI: 17–27) were calves. This equates to a density of approximately 4.4 moose/mi² in the census area and indicates the population has continued to grow since 2010. However, the spatial distribution of moose during winter is heavily skewed away from elevations > 1000 feet in Unit 15C. The creates high variance of moose abundance in grid cells and removal of a single high density grid cell from the GSPE census reduces the population estimate to 4,486 moose (95% CI: range 5,391–3581), of which 22% (95% CI: 14–28) were calves. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be at or above the upper end of the Intensive Management population objective. Fall composition counts in core count areas during November 2022 provided a bull ratio of 36 bulls:100 cows. Antlerless hunts, such as DM549 and AM550, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat at this time.

The lowlands in Unit 15C, south of Deep Creek and Caribou Lake, which encompasses the hunt boundary of DM549, contain high densities of moose when deep snow drives moose to lower elevations. The human population continues to grow in these areas doubling in size since the 1980's, according to U.S. Census Bureau statistics. In 2023, the hunt area was expanded to reduce hunter conflicts with private property owners. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 25 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 63 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-061)

PROPOSAL 157

5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 18 as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
-----------------------------	---	------------------------------------

(16)

Unit 18 Kuskokwim Area, that portion easterly of a line from the mouth of the Ishkowitz River to the closest point of Dall Lake then to east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (60 59.41' N. latitude, 162 22.14' W. longitude), continuing upriver along a line one-half mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver along the east bank of Crooked Creek to the outlet at Arhymot lake, then following the south bank of Arhymont Lake easterly to the Unit 18 border and north of and including the Eek River drainage

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only, up to 100 permits may be issued

Sept. 1-Oct. 15

...

Unit 18, that portion that drains into Kuskokwim Bay south of the Carter Bay drainage

RESIDENT HUNTERS:

...

1 moose by registration permit only; to be announced by emergency order

Dec. 1—Mar. 31
(Season to be announced)

No open season.

Remainder of Unit 18

RESIDENT HUNTERS:

3 moose; of which only 1 may be an antlered bull; a person may not take a calf or a cow accompanied by a calf; or

Aug. 1—Sept. 30

3 antlerless moose; or

Oct. 1—Nov. 30

3 moose

Dec. 1—April 30

NONRESIDENT HUNTERS:

1 antlerless moose

Dec. 1— Mar. 15

...

What is the issue you would like the board to address and why? To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually. The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014 Board of Game meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area and nonresident antlerless hunt was adopted at the January 2017 board meeting in Bethel. The Kuskokwim hunt was adopted at the January 2024 board meeting in Kotzebue. Both the Remainder and Goodnews antlerless hunts were amended at the board meeting in Nome in 2020 . The board has previously reauthorized the antlerless moose

season for resident hunts in Unit 18 remainder for regulatory year (RY) 2016 through RY2023. This proposal requests reauthorization for RY2024.

Implementation of antlerless hunts began in 2007 and has continued each year due to increased moose abundance, productivity, and population growth along the Yukon River drainage in Unit 18. Based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated at a minimum of 24,000 animals with calf:cow ratios ranging from 36:100 to 61:100, and twinning rates from 15% to 50% for all areas. Population growth and range expansion continues in this portion of Unit 18. The population is expected to continue to grow with high recruitment and adult survival.

Current year harvest data in the Remainder of Unit 18 has not been finalized; harvest is expected to be similar to the past 4 years and well below sustained yield for this robust population. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18. The nonresident antlerless moose hunt has had very low participation. Harvest has been three antlerless moose (all cows) in the past 5 years.

The moose population in the Goodnews River drainage has grown steadily in the past 15 years following a closure in 2004. The fall hunt had a quota of 10 in the first few years of the hunt and recently increased to 45. The season has not been closed by executive order in that time, and for the past few years the quota has not been met. In the seven years that the winter hunt has been held, harvest has been low (with a range of 0-6 animals). The March of 2024 survey observed 450 moose and based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Goodnews River Drainage.

In January of 2024 at the board meeting in Kotzebue, the board adopted a drawing hunt for antlerless moose on the Kuskokwim River. The first hunt is anticipated to be held in the fall of 2025. In February of 2024 the midpoint of the population estimate was 3,336 moose in Zone 1 of the Kuskokwim hunt area. In the same month, the department counted an additional 2,327 moose in a minimum count of Zone 2 of the hunt area. Following a moratorium, the Kuskokwim moose population has experienced rapid growth and range expansion and is starting to see early signs of resource limitation and high browse removal rates.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-057)

PROPOSAL 158

5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a fall antlerless hunt during September and a winter any-moose season during February in a portion of Unit 19D as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		
...		
Unit 19(D) upstream of the Selatna River, excluding the Black River		
1 antlerless moose by drawing permit only; up to 20 permits may be issued	Sept. 1 – Sept. 30	No open season
...		
1 moose by registration permit only, a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season
...		

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually.

The moose population in Unit 19D upstream of the Selatna River recently experienced a significant decline due to an extremely difficult winter in 2022/2023. During a November 2023 survey a decline was documented from 2,471 moose (2.2 moose/mi²) to 1,591 moose (1.4 moose/mi²). Due to this decline the Department of Fish and Game closed the winter hunt in regulatory year (RY) 23 by emergency order. Proposal 66, which was passed by the Board of Game in March 2024, authorized a new draw permit hunt in the fall for antlerless moose in a portion of Unit 19D. This proposal was submitted by the McGrath Advisory Committee prior to the documented decline of moose. While the department does not intend to issue antlerless permits in RY24 we would like to keep the hunt available as a tool to provide additional opportunity when it is again warranted.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 159

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

Reauthorize the antlerless moose seasons in Unit 20A as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18) Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb.	
...		
1 moose by targeted permit only; by crossbow	Season to be announced by emergency order	

shotgun, or bow and arrow only; up to 100 permits may be issued

(General hunt only)

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts are important for maintaining the moose population at levels that the habitat can support. Antlerless hunts also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest,

and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Subsistence hunters in the portion of Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

Reauthorizing antlerless moose hunts will allow hunting opportunity and harvest to increase and allow the Department of Fish and Game to manage the moose populations at an optimum level. The additional harvest will help meet IM harvest objectives without reducing bull-to-cow ratios. Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at a level compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The current objective is to maintain moose numbers within the IM population objective of 10,000–15,000 moose, while monitoring indicators of moose and habitat condition for positive density-dependent responses. The Unit 20A population was estimated at between 9,240–12,800 moose (90% confidence interval) in November 2022. There is an estimated 5,040 mi² of moose habitat in Unit 20A which equates to a moose density of between 1.8 and 2.5 moose/mi². The median of this estimate falls within the IM population objective. The department will continue to monitor Unit 20A twinning rates and short yearling weights as indices for nutritional condition of the moose population. The department has seen a slow and steady increase in both twinning rates (16%) and short yearling weights (400lbs) and are nearing the thresholds of 20% twinning rates and 400lb short yearling weights. This indicates that the nutritional condition of these moose is improving. However, the department does not want the population to further increase until we reach the thresholds of both 20% twinning rate and 400lb short yearlings. As the department continues to monitor Unit 20A twinning rates and short yearling weights, it may recommend fewer antlerless hunts in the future if these two thresholds are surpassed. The Unit 20A population is currently at the low end of the IM population objective and recovering from the difficult winter of 2021/2022. The department wants to survey the Unit 20A population in November of 2024 and evaluate the population and how it is recovering after the difficult winter. No antlerless hunts have been conducted since that winter and a cautious approach on when antlerless harvest is again appropriate is being taken. If the department detects the population is again growing in Unit 20A and is within IM population objectives then a modest harvest rate may be available for hunters. A harvest rate of 1% of the population has been shown to stabilize the moose population at its current level. Antlerless harvest would be by drawing permits for a majority of Unit 20A and a registration permit outside the Fairbanks non-subsistence area in northwest Unit 20A near Nenana. The harvest objective will be based on the most recent survey results. The antlerless harvest will target the highest density portions of Unit 20A. The Department did not issue antlerless moose permits in 2022 because of a severe 2021/2022 winter

and the anticipated high mortality, or in 2023 and 2024 because a population estimate was not completed until after the drawing permit application period. The next possible time to hunt antlerless moose would be in the fall of 2026.

The number of moose in Unit 20A was estimated at 17,768 (3.5 moose/mi²) in 2003. Research indicated this high-density moose population was experiencing density-dependent effects, including low productivity, relatively light calf weights, and high removal rates of winter forage. The objective beginning in regulatory year 2004–2005 (RY04) was to reduce moose numbers to the population objective of 10,000–12,000 moose (1.5–1.8 moose/mi²) unless indicators of moose condition showed signs of improvement at higher densities. In 2016, the Board of Game adopted the IM population objective of 10,000–15,000 moose and the 2022 population estimate is within the IM objective.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-051)

PROPOSAL 160

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

Reauthorize the antlerless moose seasons in Unit 20B as follows:

Units and Bag Limits (18)	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
...		
Unit 20(B), that portion within Creamer’s refuge		
...		

Units and Bag Limits

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

1 antlerless moose by muzzle-loader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area

Unit 20(B), remainder of the Fairbanks Management Area

...

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

1 moose by targeted permit only; up to 100 permits may be issued

Unit 20(B), that portion within the Minto Flats Management Area

RESIDENT HUNTERS:

...

**Resident
Open Season
Subsistence and
General Hunts**
Sept. 1–Nov. 27
(General hunt only)

Dec. 1–Jan. 31

Sept. 1–Nov. 27
(General hunt only)

Season to be announced
by emergency order

**Nonresident
Open Season**
Sept. 1–Nov. 27
(DM786 only)

No Open Season

Sept. 1–Nov. 27
(DM786 only)

No open season.

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
1 antlerless moose by registration permit only	Oct. 15–Feb. 28 (Subsistence hunt only)	No open season.
...		
Unit 20(B), the drainage of the Middle Fork of the Chena River		
1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb. (General hunt only)	No open season.
...		
Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway		
...		
1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Last day of Feb. (General hunt only)	No open season.
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
Remainder of Unit 20(B)		
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14 (General hunt only)	No open season

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
...		

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population may exceed population objectives causing habitat degradation and a loss of opportunity to hunt a surplus of antlerless moose. The reauthorization of antlerless moose hunts in Unit 20B will allow Alaska Department of Fish and Game (ADF&G) to manage the moose population within the population objectives of 12,000 to 15,000 moose. Hunting opportunity and harvest will increase and allow ADF&G to manage this moose population at optimum levels. The additional harvest is necessary to meet intensive management harvest objectives while maintaining bull-to-cow ratios within objectives. Moose populations will benefit by maintaining moose densities at levels compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The moose population level in Unit 20B is currently below the population objective of 12,000–15,000 moose. The population declined from an estimated 20,173 moose in 2009 to 11,064 in 2015, due in large part to antlerless moose hunts designed to lower the population to those objectives. The population increased slightly to 12,871 moose in 2017 and was estimated at

12,479 in 2020. A population estimate was conducted in the fall of 2023. It was the first survey completed since the winter of 2021/2022 which was a difficult winter for moose due to weather events. The 2023 Unit 20B moose population estimate was 7,848 moose. The department feels that at this time antlerless hunts should be limited until the population recovers and is within IM objectives. The department recommends limited antlerless hunts in the Fairbanks Management Area (FMA) and the Richardson Highway corridor hunt. The department will continue to monitor the moose population and may implement additional antlerless hunts in the future if the population can sustain the harvest.

Fairbanks Management Area (FMA)—The purpose of this antlerless hunt is to regulate population growth in the FMA and reduce potential moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest, and reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during RY99–RY10. Moose–vehicle collisions and moose nuisance problems have remained lower since this time, presumably, in part due to consistent antlerless moose harvests.

Richardson Highway Corridor Hunt- This hunt is an “any” moose drawing permit that allows hunters to hunt within ½ mile of each side of the Richardson Highway. The purpose of this hunt is to allow hunters to harvest moose along the Richardson Highway to help reduce moose-vehicle collisions.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game. (HQ-F24-052)

PROPOSAL 161

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

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

(18) hunting seasons and bag limits for moose in Unit 20 are as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		

Unit 20(D), that portion lying

west of the west bank of the Johnson River and south of the north bank of the Tanana River, except the Delta Junction Management Area and the Bison Range Controlled Use Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued may be issued in combination with those portion in the Delta Junction Management Area and the Bison Range Controlled Use Area; a person may not take a calf or a cow accompanied by a calf;

Sept. 16 – Sept. 25
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10 - Nov. 25
(General hunt only)

...

Unit 20(D), that portion within the Bison Range Controlled Use Area

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued in Unit 20(D) lying west of the west bank of the Johnson River and south of the north bank of the Tanana River and the Delta Junction Management Area; a person may

Sept. 16 – Sept. 25
(General hunt only)

not take a calf or a cow accompanied by a calf;

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued Unit 20(D) lying west of the west bank of the Johnson River and south of the north bank of the Tanana River and the Bison Range Controlled Use Area; a person may not take a calf or a cow accompanied by a calf;

Sept. 16 – Sept. 25
(General hunt only)

1 moose every four regulatory years by drawing permit a person may not take a calf or a cow accompanied by a calf; or

Sept. 1 - Sept. 15
(General hunt only)

...

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10 - Nov. 25
(General hunt only)

NONRESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1 - Sept. 15

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually. The objectives of the Unit 20D antlerless moose hunts are to 1) stabilize population growth of this high-density moose population; 2) address concerns about range degradation, reduced nutritional condition of moose, and reduced reproductive success of moose; 3) make progress toward meeting the Unit 20D intensive management (IM) harvest objective of 500–700 moose; and 4) provide youth and disabled veteran hunting opportunity. These objectives are being met.

If antlerless moose hunts are not reauthorized, the moose population could quickly increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised.

Antlerless moose hunts are offered in southwest Unit 20D, which has the highest moose density in the unit. This area has great potential for population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 40 years. Total moose harvest in all of Unit 20D averaged 146 bull moose during regulatory years 2020 and 2021. No antlerless moose were harvested in regulatory year (RY) 22 or RY23 as the moose population experienced a 40% decline as a result of the severe winter of 2021 – 2022. However, the population has begun to rebound, and a very small antlerless hunt is planned for RY24 with less than 20 tags issued.

Antlerless hunting opportunity and harvest is limited at present to help maintain this moose population at current densities and within habitat carrying capacity. The largest antlerless harvest (n=510) occurred in Unit 20D in 2007, when antlerless hunts were first authorized to reduce population size and address moose nutritional concerns. Since 2011, the southwest Unit 20D population estimates (range = 2,500–4,500 moose) and bull harvest in southwestern Unit 20D (201–282) have been stable. The 2022 population estimate for southwest Unit 20D was 2,459 moose (corrected for sightability) with a density of 1.94 moose per square mile, 28 calves:100 cows and 23 bulls:100 cows. The 2022 population estimate is 40% lower than the 2020 estimate, likely due to increased mortality as a result of severe winter conditions during 2021–2022, which included deep snow and winter rain events. The Department of Fish and Game does expect nutritional indices to improve because of fewer moose on the landscape relative to habitat capacity. This process is already evident as the 2023 population estimate of 3,555 moose was an increase compared to 2,459 moose in 2022. In order to prevent the moose population from experiencing nutritional stress in future years, a few antlerless permits will be warranted annually going forward.

Continued antlerless harvest will likely be needed to maintain this population at the optimal density relative to habitat constraints and will contribute additional harvest toward meeting the IM harvest objective of 500–700 moose without reducing bull-to-cow ratios below management objectives. The current population trend suggests that low, consistent antlerless harvest provided by drawing permit hunts in Unit 20D, in conjunction with other mortality factors (including ceremonial harvest, vehicle collision, accidents, and predation), is appropriate to maintain population stability.

The department will continue to evaluate antlerless moose hunts and their effect on moose density and population growth. Future antlerless moose hunts will be implemented as needed based on the evaluation of the following three indices of density-dependent moose nutritional conditions in relation to changes in moose density: biomass removal of current annual growth on winter browse, proportion of females with twin calves, and late-winter calf weights.

Additional drawing or registration permits will be issued only if more harvest is needed in specific areas to maintain optimal moose densities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-053)

PROPOSAL 162

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

Reauthorize the antlerless moose seasons in Unit 20E as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
...		
Unit 20(E), remaining portion of the Ladue River Controlled Use Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or	Aug. 5–Sept. 5 Oct. 15–Nov. 30	

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

Oct. 15–Nov. 30

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5–Sept. 5

Oct. 15–Nov. 30

Unit 20(E), that portion outside of the Ladue River Controlled Use draining into 1) the Ladue River upstream of the South Fork of the Ladue River, 2) the Dennison Fork of the Fortymile River, and 3) the Mosquito Fork of the Fortymile River drainage.

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or

Aug. 5–Sept. 5

Oct. 15–Nov. 30

1 antlerless moose by drawing permit only; up

Oct. 15–Nov. 30

to 400 permits may be issued;
a person may not take a cow
accompanied by a calf

NONRESIDENT HUNTERS:

...

1 antlerless moose by
drawing permit only; by youth
hunt only; up to 100 permits
may be issued in combination
with the nonresident drawing
hunt; a person may
not take a cow accompanied
by a calf

Aug. 5–Sept. 5
Oct. 15–Nov. 30

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The Unit 20E antlerless moose hunts were originally adopted by the Board of Game in March 2022 as a proactive management tool with the primary goals to 1) slow population growth to avoid habitat damage, 2) help achieve intensive management (IM) harvest objectives, and 3) provide the management flexibility to rapidly respond to changes in nutrition.

Current Unit 20E moose harvest is below IM harvest objectives; therefore, antlerless harvest, if enacted, would help achieve IM harvest objectives without reducing bull:cow ratios below management objectives. The Unit 20E IM harvest objective is 250–450 moose, and the RY19–RY23 annual average unit wide reported harvest was 191 moose.

The decision framework to initiate antlerless harvest in Unit 20E includes population trend, bull:cow ratios, and nutritional indices. The moose population within a 1,821 mi² area along the Taylor Highway in southern Unit 20E approximately doubled from 0.7 moose/mi² in 2005 to 1.4 moose/mi² in 2018, but declined to 0.9 moose/mi² by 2023 following several severe winters. Bull:cow ratio estimates in southern Unit 20E are currently stable and above the minimum management objectives. Finally, nutritional indices show that the moose population is currently at healthy nutritional levels. Twinning rates are healthy at 34% (2021–2023, 3-year weighted average). The department closely monitors these rates given the potential for them to lag as an indicator of population-level nutritional condition. Additionally, the estimated browse removal rate in spring 2022 was 28%, which is below the rate observed in nutritionally stressed populations.

Given the current stable population trend and bull:cow ratios and healthy nutritional indices, the department does not plan to enact antlerless hunts during regulatory year (RY) 25 but would like to retain the hunts as a proactive management tool. The Unit 20E antlerless harvest framework

provides management flexibility to rapidly respond to potential future changes in nutrition and the ability to proactively reduce population growth rates, if necessary, to maintain the current high nutritional levels.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-054)

PROPOSAL 163

5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(19)		
...		

(B) on or after July 1, 2018, the hunting seasons and bag limits for moose in Unit 21 are as follows:

...

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

RESIDENT HUNTERS:

...

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

(Winter season to be announced)

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose recently emerged because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. This reauthorization will likely improve or maintain hunting opportunity. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost, and the ability to meet intensive management (IM) harvest objectives could be reduced. In addition, rather than allow the population to go through dramatic rates of expansion and contraction, it is necessary to slow the rate of increase.

The IM harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2014–2023 was 391 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not met the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. Subsistence hunters will benefit from the opportunity to harvest cow moose.

Analysis of three Trend Count Areas (TCAs) (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough TCAs) within the Kaiyuh Flats in this hunt area demonstrated an increase in moose abundance among all age classes from 2001 to present. Geospatial population estimate data also increased from 1,897 ($\pm 11\%$) moose in 2011 to 4,116 ($\pm 10\%$) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates 2004-2023 (avg. = 35.4%), although the most recent 5-year twinning rate average (2019-2023) was 26.0%.

The portion of Unit 21D affected by this reauthorization is approximately 21% (2,559 mi²) of the u (12,093.6 mi²). Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the total moose in Unit 21D; estimated at 10,478 moose ($\pm 1,572$) in 2023. The total Unit 21D moose population estimate was above the IM population objective of 9,000–10,000 moose for all of Unit 21D (12,093.6 mi²).

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-056)

PROPOSAL 164

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during part of February and March in Unit 21E as follows.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
...		
Unit 21(E)		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, a person may not take a cow accompanied by a calf	Feb 15 – Mar 15	
...		

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The most current survey in 2022 indicated there are approximately 9,300 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000–11,000 moose. There is currently a harvestable surplus of 390 moose, however many of those moose are not accessible in the fall. Approximately 200 moose are harvested each fall along the rivers. Bull-to-cow ratios are high, with 46 bulls per 100 cows in 2022. The IM harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 1.9 moose/mi² in 2022. The two-year average twinning rate in the Holy Cross area is 26%, while north of Anvik and Shageluk (where the moose density is lower) the twinning rate is 56%.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure temporally and allow access to areas inaccessible in the fall.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-055)

PROPOSAL 165

5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 26 as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(24) ... Unit 26(A), that portion west of the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155 00 longitude excluding the Colville River drainage 1 moose	July 1 - Sept. 14	No open season.

What is the issue you would like the board to address and why? To be retained, the antlerless moose season in the portion of Unit 26A west of 156° 00' W longitude and excluding the Colville drainage must be reauthorized annually. This hunt was recently created by the board at the 2024 meeting in Kotzebue after being closed for the previous year due to not being reauthorized in 2023.

The moose population in the western portion of Unit 26A north of the Colville drainage is somewhat unique compared to the unit-wide population, and the distribution is very sparse because there is very little moose habitat in the coastal plain. However, each year a small number of bulls and cows migrate into the area from the major river drainages in the central and southern parts of the unit. So far, the marginal habitat in this portion of Unit 26A has not allowed moose to establish a population, but these moose provide the only opportunity to harvest a moose in the northwestern portion of Unit 26A.

Unit 26A moose population estimates have historically fluctuated between 294 and 609 moose between 2011 and 2014. More recently, 348 moose and 438 moose were observed in 2018 and

2021, respectively. The overall trend appears to be slow growth after a decline that started about 2007. The number of moose in the antlerless hunt area is difficult to estimate, but is approximately 10 moose. Harvest reports indicate 4 antlerless moose have been harvested since 2005, and the annual harvest rate of antlerless moose is less than 1% of the total population. Due to the low harvest rate, the department proposes reauthorization of the antlerless moose season in this area to provide additional hunting opportunity for the small number of hunters to opportunistically harvest antlerless moose in this remote portion of Unit 26A.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-058)

Proposed Outside the Board of Game's Authority

The following proposals request changes that the Board of Game does not have authority to adopt. They are included in the book for review, comment, and discussion at the applicable board meeting if the board desires.

Note: Alaska Statute 11.61.210 prohibits shooting from, on, or across highways.

PROPOSAL 166

Add an exception to 5 AAC 92.080(1). From "by shooting from, on, or across a highway;" to "by shooting from, on, or across a highway except where a highway is seasonally closed to normal traffic because of discontinued maintenance or on low speed, very low traffic roads/trails with no planned maintenance."

What is the issue you would like the board to address and why? (1) Shooting from, on, or across a highway There is a problem with the definition of a highway as used in this regulation. Although the term highway is found here in AS 16 it is found in other Titles also. This is a public safety issue and should be always maintained on paved and unpaved roads where regular traffic is operating. An exception is needed for "highways" that are only being used for other vehicles in very low traffic volumes. There is no safety issue for highways that are closed to normal traffic. Examples are highways like the Denali Highway where winter travelers are met with "No maintenance signs" a very short way in from each end. Winter travelers on snow vehicles, skis, snowshoes etc. can often only identify where the highway is because of a snowmachine trail over deep snow. The other situation that warrants an exception are minimally developed roads and trails that are "maintained" only occasionally. Examples are road/trails like the Copper River "Highway" below Chitina (busy in the summer no vehicles after snowfall) and the trail from Murphy Dome to Minto Flats (north and west of Fairbanks, where the state maintenance is not even an annual occurrence). Some wood cutting and timber harvest roads/trails would also be good examples when those activities are closed. Hunter safety training mandatory. There is not a safety problem hunting along these closed to normal traffic or with extremely low volumes from hunters exercising normal hunting awareness and cautions.

PROPOSED BY: Mike Tinker

(EJ-F23-636)

Note: Alaska Statute 16.05.330 and 16.05.400 stipulate the requirements for Alaska hunting licenses.

PROPOSAL 167

If a resident has a Tribal ID card, they will be exempt from the regulation requiring a hunting license.

92.012 (a) No hunting or trapping license is required of a resident hunter under the age of 18 **or those that hold a tribal ID card issues by a federally recognized tribe.** An appropriate license and big game tag are required of nonresidents, regardless of age, for hunting and trapping. No person may take waterfowl unless that person has a current, validated, federal migratory bird hunting stamp or "duck stamp" in possession as required under federal regulations.

What is the issue you would like the board to address and why? Remove the requirement for residents who hold a tribal card to obtain a hunting and/or trapping license. In remote rural areas, economic opportunities may be limited affecting the user's ability to afford a hunting license. License vendors are also not always available in smaller communities. Internet capabilities may also not be available or are too costly to have, thus making it difficult to obtain licenses online which potentially restricts access to a vital food source. Those that have a Tribal ID card will serve as a legal license to allow hunting or trapping.

The state has the authority and jurisdiction to require or not require licenses.

PROPOSED BY: Manokotak Village Council (EG-F24-014)

Note: Alaska Statute 16.05.330 and 16.05.400 set the hunting license requirements for Alaska.

PROPOSAL 168

If a resident has a Tribal ID card, they will be exempt from the regulation requiring a hunting license for small game.

92.012 (a) No hunting or trapping license is required of a resident hunter under the age of 18. **If hunting small game, a hunting license is not require for those that hold a tribal ID card issues by a federally recognized tribe.** An appropriate license and big game tag are required of nonresidents, regardless of age, for hunting and trapping. No person may take waterfowl unless that person has a current, validated, federal migratory bird hunting stamp or "duck stamp" in possession as required under federal regulations.

What is the issue you would like the board to address and why? Remove the requirement for residents who hold a tribal card to obtain a hunting and/or trapping license. In remote rural areas, economic opportunities may be limited affecting the user's ability to afford a hunting license. License vendors are also not always available in smaller communities. Internet capabilities may also not be available or are too costly to have, thus making it difficult to obtain licenses online which potentially restricts access to a vital food source. Those that have a Tribal ID card will serve as a legal license to allow hunting for small game. The state has the authority and jurisdiction to require or not require licenses.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? The proposal was discussed and developed with Manokotak City Council, Manokotak Tribal Council, and Manokotak Native Ltd.

PROPOSED BY: Manokotak Village Council

(EG-F24-015)

Note: Development of the hunting regulations booklet is an exercise of administrative authority by the Department of Fish and Game.

PROPOSAL 169

We would like the Department of Fish and Game to insert in the Hunting Regulations an illustration of how to determine an antlerless bull from a cow in the winter. We (the members of the committee) get a side view and look for the white or brown spots where the antlers have detached. Good optics are recommended and don't pull the trigger if unsure.

What is the issue you would like the board to address and why? With the BOG creating any bull winter draw hunts in 16B it has probably created a problem with new or inexperienced winter hunters having difficulty determining a bull from a cow since during much of the hunt period bulls have no antlers. This probably causes accidental harvest of cows, and additional harassment of moose from inexperienced winter hunters. As the moose antler sealing study on the Kenai has shown the average hunter seems to have difficulty determining a legal bull.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was discussed and recommended by Mt Yenlo AC.

PROPOSED BY: Mt. Yenlo Fish and Game Advisory Committee

EG-F24-018)

Note: Alaska Statute 16.05.420 prohibits transferability of hunting permits.

PROPOSAL 170

If the board would so allow, I ask they adopt and allow that "a child up to the age of 15 belonging to the mother could be gifted said tag". Thus allowing "their child" the draw tag to be used under the supervision of the spouse/father. This would ONLY be for expectant mothers who have won a permit but are unable to access the field to hunt due to pregnancy.

I ask that if the board adopts this proposal that they may work up the correct language to meet their decision.

What is the issue you would like the board to address and why? I am asking the board to consider and act on changing the successful draw results for resident Alaskan mothers who "after winning a draw permit and during the open season for animal to be harvested" is unable to partake in the hunt due to pregnancy.

PROPOSED BY: Jacques Etcheverry

(EG-F24-027)

Note: The Board of Game does not have authority to regulate domestic animals. Game is defined by statute to exclude domestic animals, Alaska Statute 16.05.940.

PROPOSAL 171

All domestic animals on lands designated Refuge's, Critical Habitat Area's, Range's and Parks must be physically restrained by a tether of no more than six feet. Domestic animals involved in legitimate hunting activities, search & rescue operations and certified service animals are exempt from this regulation but must be under direct supervision and immediate control by their handler.

What is the issue you would like the board to address and why? Currently, unrestrained domestic animals pose a risk to wildlife on Alaska's public lands. Whether through domestic diseases and parasites, attacks or just undue stress, many individuals of Alaska's wildlife populations perish. Every year, many domestic dogs are brought to the vet to have porcupine quills removed from deep in their throats but no one ever questions if the porcupine survived the attack. Every year, domestic dogs chase bears and moose through the woods which can lead to a DLP situation or a motor vehicle collision. Especially in winter, this type of chasing puts undue stress on moose that are already near their breaking point and could be fatal, as we have seen with several high profile DLP incidents this past winter (those animals were not chased, but the added stress of domestic canines pushed them to the brink.). The Kenai wolves are a prime example of domestic parasites (lice) making the jump to wild populations. This proposal should be under the purview of the Board of Game as it addresses a direct biological threat to wildlife.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Brad Christensen (EG-F24-031)

Note: Alaska Statute 16.05.408 restricts nonresident alien hunters from hunting big game with second degree of kindred relatives and requires a guide.

PROPOSAL 172

Remove the prohibition of nonresident aliens to hunt as second degree of kindred. A nonresident alien who hunts for moose, blacktail, elk or caribou must be accompanied in the field by an Alaskan licensed guide or resident relative within the second degree of kindred age 19 or older ** who possess a valid Alaskan hunting license. The guide or resident relative must be within 100 yards of the nonresident alien when they attempt to take game.

What is the issue you would like the board to address and why? As a legal permanent resident (Canadian Citizen, working on US citizenship) it would be nice to have my father to come up and hunt moose with me as second degree of kindred. There can't possibly be enough Alaskan residents with nonresident alien family members that fall under the second degree of kindred to negatively affect the game populations. There are legal permanent residents in Alaska who call Alaska home,

own businesses and plan on living here the rest of their lives and would like to spend time with their families doing the things they grew up doing together. If this were available for ungulate hunting it would have minimal affect on loss of revenue for outfitters and would be beneficial financially to transporters. I would think someone from Canada who hunts moose would have more knowledge and experience hunting moose in Alaska than someone let's say from New Mexico who can buy an over-the-counter tag.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No

PROPOSED BY: Shane Foord (EG-F24-032)

Note: The Board of Game does not have authority to regulate guides. Additionally, Alaska Statute Chapter 8.54 sets the eligibility and licensing requirements for guides and transporters. The U.S. Constitution prevents states from prohibiting employment to residents of other states.

PROPOSAL 173

Only resident guides can guide nonresident hunters for guide required animals.

What is the issue you would like the board to address and why? Alaska big game hunting guides should be Alaska residents. If a nonresident cannot shoot some species of game without a guide, it should not be legal for a nonresident guide-to take a nonresident client to hunt for restricted animals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No

PROPOSED BY: Don Coatney (EG-F24-038)

Note: Surveying wildlife populations and utilizing helicopters for intensive management purposes in Unit 17 are administrative authorities of the Department of Fish and Game.

PROPOSAL 174

This program of killing bears from helicopters needs to be put on pause till ADF&G can come up with a population assessment of bear density before they kill an entire population of bears in the designated area. The quote I have heard from both the biologist and the board member I spoke with is that "our plan is to kill ALL the bears in the prescribed areas around caribou calving grounds". There needs to be a more in depth look at the bear population and the public needs to be allowed to have public comment. This program added bears to the intensive management plan after it had already been approved. This allowed the board to approve the addition without public comment, and it was done with out a public notice. The program for killing bears from helicopters

needs to have scientific data to back up claims that killing all these bears with not do more harm than good. ADF&G needs to come up with a cap on the number of bears being killed. In the meetings leading up to this Program last year we were told by the biologist 30 bears was the estimated number they would kill, now they say over 90 were killed the first year and they want to continue killing for two more years.

What is the issue you would like the board to address and why? ADF&G is shooting brown bears from helicopters. ADF&G has not done surveys that can show that the brown bear population is either too high or that killing as many bears as they already have will hurt the bear population long term. After attending many meetings and having phone conversations with the biologist, board members and AC members, no one has any information on bear density or even a basic estimate on the population. The only survey mentioned by the biologist saw 20 bears in the intensive management area. The killing of bears from a publicly funded helicopter is slated to continue for two more years. Last year over 90 brown bears were killed, and there is no quota set for how many more they will kill.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal has been something I developed.

PROPOSED BY: Gabriel Davis (EG-F24-042)

Note: Antlerless moose may not be taken unless authorized under Alaska Statute 16.05.780. Additionally, federal and state court decisions have upheld a constitutional religious right to take fish and game, including antlerless moose, out of season and in excess of bag limits for funeral potlatches unless the state has a compelling reason to restrict such harvest. However, the courts also determined that right does not extend to memorial potlatch ceremonies.

PROPOSAL 175

5 AAC 92.019. Taking of big game for certain religious ceremonies.

(a) The hunting and taking of game species [HAVING A POSITIVE FINDING IN 5 AAC 99.025] outside the seasons or bag limits established in 5 AAC 85, for use in this state as food in customary and traditional Alaska Native funerary or mortuary religious ceremonies within 12 months preceding the ceremony is authorized if consistent with sustained yield principles.

(b) The department shall publicize a list of game populations and areas, if any, for which the taking of game is inconsistent with sustained yield principles. It is the hunter's responsibility to contact the department to find out which game populations and areas are excluded from taking under this regulation.

(1) The taking of big game for certain religious ceremonies is independent of local antlerless moose reauthorizations and is only required to adhere to sustained yield principles.

(c) A written permit from the department is not required for taking game under this section, except that in nonsubsistence areas, described in 5 AAC 99.015, and the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area defined in 5 AAC 92.074(d), a ceremonial harvest report form, provided by the department, must be obtained and jointly completed by the hunter and the tribal chief, village council president, clan leader, traditional Native head of family, or clan leader's designee for the village associated with the customary and traditional Alaska Native funerary or mortuary religious ceremony.

(d) Before game is taken under this section a tribal chief, village council president, clan leader, traditional Native head of family, or the chief's, president's, traditional Native head of family, or clan leader's designee for the village associated with the religious ceremony, must notify the nearest office of the department that a hunt for game will take place. The notification must include the number of animals expected to be taken and the location where the taking will occur. The tribal chief, village council president, clan leader, traditional Native head of family, or designee must maintain records of the successful hunters and the decedents for the ceremony, and make that information available to an authorized representative of the department upon request. The tribal chief, village council president, clan leader, traditional Native head of family, or designee must notify the department of the location, species, sex, and number of animals taken under this section as soon as practicable, but not more than 15 days after the taking of game.

(e) The taking of big game for a customary and traditional Alaska Native funerary and mortuary religious ceremony shall take place outside of the individual designated hunter or hunters' regular hunting seasons and bag limits. A person shall not be withheld from participating in normal hunting seasons and bag limits, because they participated in a successful hunt for a customary and traditional Alaska Native funerary and mortuary religious ceremony.

(f) It is an affirmative defense to a prosecution for hunting or taking big game outside the season or bag limit restrictions established in 5 AAC 85 that

(1) the person is a resident of this state;

(2) the hunting or taking was authorized under this section and the meat was used in a customary and traditional Alaska Native funeral or mortuary religious ceremony; and

(3) if the person took big game, the requirements of (d) of this section have been met.

(g) This section does not authorize the taking of game in areas where hunting is prohibited or when prohibited by a federal law that preempts state laws on point.

(h) In this section, "traditional Native head of family" means a person who, according to an Alaska Native tradition, is viewed as a head of a family and is charged with duties similar to those of a tribal chief, village council president, or clan leader regarding traditional Alaska Native funerary or mortuary rites.

What is the issue you would like the board to address and why? The existing language “...having a positive finding in 5 AAC 99.025”, within 5 AAC 92.019 restricts harvest practices for religious ceremonies. These findings have and will continue to become barriers to fulfilling the moral duty of families and communities to continue ancestral traditions to the best of their ability, while recognizing the need to continue to adapt traditions to the sustainability of and changes to the ecosystem. Regulation should consider the evolving nature of Alaska Native religious practices, which may need to incorporate new animal species as part of their traditions due to changing environmental and social landscapes.

Communities throughout the state are facing the drastic effects of climate change, rapid development, and harmful management decisions. With the drastic decline in salmon, Alaska Native people are relying more heavily on other species to fulfill subsistence, educational, cultural, and ceremonial needs. Instability within moose populations additionally makes it challenging for communities to imagine ceremonial reliance on these animals to match historic levels and traditional species/amount of take. Alaska Native people are reliant on the resources made available by and hosted on the landscape- the adaptive nature of Alaska Native values enables the evolution of ceremonial practices. The removal of the requirement for a positive customary and traditional use finding enables Tribes and communities to continue traditions using game already integrated into ceremonies, as well as newly introduced species that Alaska Native peoples have recently or will incorporate into their ongoing ceremonies and practices.

At the recent Board of Game meeting, it was made clear that confusion exists, among hunters, advisory committee members, Board members, and staff, regarding the correlation between the reauthorization of antlerless moose hunts and the ability for cow moose to be taken under the authority of 5 AAC 92.019 for traditional Alaska Native funerary and mortuary religious ceremonies. By clarifying that hunting under this provision must abide by sustained yield principles—and not antlerless reauthorizations—it affirms that if a moose population in a game management unit is within sustainable limits, a designated hunter for a ceremony can pursue either a cow or a bull, regardless of reauthorization status. Explication is crucial to ensure that traditional ceremonies can proceed without legal contention or confusion, supporting cultural continuity and legal clarity- benefiting both hunters and the department.

It is shared belief among Alaska Native peoples and communities that fish and game give or present themselves in time of need. Through 10,000 years of relations with the land, Alaska Native people maintain beliefs and traditions based on ancestral connection with the land. The execution of traditional and cultural ceremonial practices involves hunters abiding by the belief that in times of need, such as a funerary or mortuary religious ceremony, animals present themselves- and it is the responsibility of the hunter to take that animal, something Justice Matthews refers to as “acts which conscience compels [the hunter]”. The Frank decision states, “[4] A law imposing criminal or other penalties on the performance of acts which conscience compels, pressures the underlying beliefs and infringes to that extent the freedom to believe.” (Carlos Frank v. State of Alaska 604 P.2d 1068 1979)

These hunters provide vital community services by ensuring the continuation of cultural practices and the provision of food during ceremonial times. It is a moral duty for these hunters to perform their roles whenever a ceremony is needed, which is essential to supporting the family and

community's fulfillment of tradition. In carrying out this ancestral responsibility the hunter is providing an integral component of the ceremony, not fulfilling their own family's food security needs. These hunters should not have to forego their own family's food security to fulfill this duty. Language ensuring that participation in ceremonial hunts does not exclude hunters from regular season activities addresses both the legal and cultural components of the regulation.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Development of this proposal was an effort from the Minto-Nenana Fish and Game Advisory Committee and Tanana Chiefs Conference.

PROPOSED BY: Minto-Nenana Fish and Game Advisory Committee and Tanana Chiefs Conference (HQ-F24-043)

Note: Antlerless moose may not be taken unless authorized under Alaska Statute 16.05.780. Additionally, federal and state court decisions have upheld a constitutional religious right to take fish and game, including antlerless moose, out of season and in excess of bag limits for funeral potlatches unless the state has a compelling reason to restrict such harvest. However, the courts also determined that right does not extend to memorial potlatch ceremonies.

PROPOSAL 176

5 AAC 92.XXX Traditional Alaska Native Memorial Potlatch Ceremony.

(a) The hunting and taking of game species outside the seasons or bag limits established in 5 AAC 85, for use in this state as food in a traditional Alaska Native Memorial Potlatch Ceremony within 12 months preceding the ceremony is authorized if consistent with sustained yield principles.

(b) The department shall publicize a list of game populations and areas, if any, for which the taking of game is inconsistent with sustained yield principles. It is the hunter's responsibility to contact the department to find out which game populations and areas are excluded from taking under this regulation.

(1) A traditional Alaska Native Memorial Potlatch Ceremony hunt is independent of local antlerless moose reauthorizations and is only required to adhere to sustained yield principles.

(c) A written permit from the department is not required for taking game under this section.

(d) Immediately after big game is taken under this section, a tribal chief, village council president, or the chief's or president's designee, for the village in which the religious ceremony will be held, must maintain a list of the designated hunters who successfully participated in the taking of the big game animals, The list must be made available, after the hunt is completed, to an authorized representative of the department upon request.

(e) The tribal chief, village council president, clan leader, traditional Native head of family, or designee must notify the department of the location, species, sex, and number of animals taken under this section as soon as practicable, but not more than 15 days after the taking of game.

(f) The hunt shall take place outside of the individual designated hunter or hunters' regular hunting seasons and bag limits. A person shall not be withheld from participating in normal hunting seasons and bag limits, because they participated in a successful traditional Alaska Native Memorial Potlatch Ceremony hunt.

(g) It is an affirmative defense to a prosecution for hunting or taking big game outside the season or bag limit restrictions established in 5 AAC 85 that

(1) the person is a resident of this state;

(2) the hunting or taking was authorized under this section and the meat was used in a traditional Alaska Native memorial potlatch ceremony; and

(3) if the person took big game, the requirements of (d) of this section have been met.

(g) This section does not authorize the taking of game in areas where hunting is prohibited or when prohibited by a federal law that preempts state laws on point.

(h) in this section, "traditional Alaska Native Memorial Potlatch Ceremony" means a traditional Alaska Native ceremony held in continuation of the funerary and mortuary religious ceremony to finalize the grieving process of a deceased individual.

What is the issue you would like the board to address and why? In 1979, the Alaska Supreme Court relied on the testimony of Traditional Chief Peter John of Minto and other Alaska Native experts in the Frank decision. The Supreme Court found that "Death is the life crisis receiving the greatest attention in current Athabascan culture." In March 2019, the Tanana Chiefs Conference (TCC) full Board of Directors passed Resolution 2019-30 Protect Ceremonial Moose after ADF&G prohibited the take of cow moose for funeral potlatch religious ceremonies, memorial potlatch ceremonies, Nuchalawoyya potlatches, and Stickdance ceremonies in the Minto Flats Management Area. TCC and its member Tribes and organizations remain concerned that the freedoms associated with Alaska Native religious expression and practice continue to be under attack.

As a result, we propose to create a new regulation to specifically ensure the right to take big game for Alaska Native memorial potlatches as part of Indigenous religious ceremonies to continue the community grieving process initiated during a preceding funerary and mortuary ceremony. In recent years, the Alaska Department of Law repeatedly stated at regulatory meetings of the Alaska Board of Game (BOG) that the Frank Decision (Carlos Frank v. State of Alaska 604 P.2d 1068 1979) only guarantees the religious right for taking certain big game animals out of season and outside normal bag limits for Alaska Native funeral ceremonies. While for many years the BOG

has authorized and ADF&G has allowed the take of certain big game for Alaska Native memorial potlatches that take place months or even years after the funeral ceremony, historical and ongoing threats to Indigenous religious freedoms at BOG meetings prompted this request for further regulatory action.

At recent BOG meetings, it has been stated on the record repeatedly that grieving communities can plan for memorial potlatches such that wild food sacraments necessary for memorial religious ceremonies can be obtain through normal hunting seasons and bag limits. However, designated community hunters for memorial take should not have to sacrifice their individual household’s food security by depriving themselves of their individual bag limit to feed the grieving community. Therefore, regulatory clarification would serve to clarify and mitigate these ongoing concerns and issues.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed through extensive discussions at Minto-Nenana Local Fish and Game Advisory Committee meetings and consultations with other local fish and game advisory committees, tribal leaders, and Tanana Chiefs Conference staff.

PROPOSED BY: Minto-Nenana Fish and Game Advisory Committee, Nenana Native Association, and Tanana Chiefs Conference (HQ-F24-045)

Note: The Board of Game was provided statutory authority to establish big game guide concession areas on state land during the 2024 legislative session. The legislation requires the Board of Game to first establish an initial concession area for a single Game Management Unit or subunit. While the bill provided statutory authority, the legislature did not provide any funding to support implementation of the program. Without funding, implementation will be challenged. The Department is hopeful that the legislature will provide the necessary funding during the next cycle.

PROPOSAL 177

State guide concession program needs to be implemented on all state lands, leave permitted draw areas the same as in current regulations. In each concession area we need to have a fixed number of sheep taken by guided nonresident hunters, a lot like the feds do on the north side of the Brooks Range ANWR. That number should not exceed 10 percent of the total harvest in a given concession, I've spent more than a few hours looking at harvest reports dating back into the 70s and nonresidents consistently harvest around 40% of our sheep. We all know weather events have put us in this bad spot, we need ewes more than rams and we don’t have a surplus of them.

What is the issue you would like the board to address and why? As we all know Alaska is hurting for sheep, the main issue with lack of sheep is over pressure and user conflicts where there might be a few sheep. Unit 19C is the tip of the iceberg.

PROPOSED BY: Pete Imhof (EG-F24-056)

Note: Alaska Statute 16.05.405 stipulates the requirements for proxy hunting.

PROPOSAL 178

5 AAC 92.011. Taking of game by proxy.

We request that the board consider assigning proxy tags to community safety net organizations.

Proposed Draft Language:

This authorization permits an Alaska resident age 10 and older with a current Alaska hunting license (Proxy Hunter) to take....some moose.... For another Alaska resident (Beneficiary) who is blind, 70% physically disabled (affidavit required), 65 years of age or older, or developmentally disabled (affidavit required) **OR for an eligible food community safety net program. Community safety net organizations are defined as: 1. Food Banks and Food Pantries. 2. Emergency shelters. 3. Programs that distribute meals to elders or individuals who experience disabilities. 4. Programs that distribute food to individuals who are experiencing food insecurity. 5. Tribes or tribal consortiums that provide food assistance. 6. Educational institutions that feed students. 7. Tribal health care organizations.**

Proxy Tags for community safety net programs will be limited to 5% of all tags issued in the Unit OR an established number as determined by the Board of Game.

A Proxy Hunter may not proxy hunt for more than [ONE BENEFICIARY] **two beneficiary tags** at a time, and may possess only [ONE AUTHORIZATION] **two authorizations** at a time.

Please note: This is our preferred solution, which we will term "Preference #1". We will also submit alternative solutions for consideration. and will rank them in order of our preference.

What is the issue you would like the board to address and why? We would like the Board to address the issue of proxy hunting. Currently, proxy hunting: *permits an Alaska resident age 10 and older with a current Alaska hunting license (Proxy Hunter) to take....some moose.... for another Alaska resident (Beneficiary) who is blind, 70% physically disabled (affidavit required), 65 years of age or older, or developmentally disabled (affidavit required). A Proxy Hunter may not proxy hunt for more than one beneficiary at a time, and may possess only one authorization at a time.*

We request that the definition of proxy hunting be expanded to allow particular organizations to be granted their own proxy tags. Our particular interest is the moose harvest in Unit 18, but there is likely application to other units. This would allow these organizations to distribute the protein to their participants, potentially include the participants in the hunts, and to serve this form of culturally-appropriate food in their meals to their constituents. We would also like the board to

consider allowing the number of proxy tags a hunter can fill on a trip from one tag to two, due to the distance most hunters must travel and expense of filling a tag. Other factors:

1. Availability of existing moose population within the Unit.
2. High levels of food insecurity throughout both the Bethel Census Area and the Kusilvak Census Area.
3. Ability to increase the availability of a culturally-appropriate and highly-desired, healthy source of protein to individuals who are a) relying on the food served by or provided by community safety net programs or b) other agencies, such as educational institutions or health care organizations.
4. To provide more opportunities for individuals receiving these resources to participate in hunts and food processing.
5. To provide easier opportunities for potential hunters who wish to help people, broadly, who are food-insecure/the organizations serving those individuals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We have developed this proposal in coordination with two committees composed of experts from throughout the Yukon-Kuskokwim Delta and elsewhere in Alaska who are examining potential structural interventions to improve food security and food sovereignty in the Yukon-Kuskokwim Delta. One group is called COMPASS: Community Partnerships to Advance Science and Society. The group and these efforts are funded with a 10-year National institute of Health grant to select structural interventions that could benefit food security and sovereignty in the YK Delta. The other committee is called the HERA: Health Equity Research Assembly. The goal of HERA is to guide the work of COMPASS in selecting the structural interventions and the methods with which those interventions are approached.

We forwarded our drafts to the Board of Game member from Bethel.

We met with staff at our local fish and game office.

We plan to discuss our proposals with our local advisory committee but because we are new to this process, we were unfamiliar with their meeting schedule. Those discussions will occur after this submission.

PROPOSED BY: Michelle DeWitt (EG-F24-067)

Note: Alaska Statute 16.05.405 stipulates the requirements for proxy hunting and AS 16.05.420 limits the transferability of hunting tags and permits.

PROPOSAL 179

5 AAC 92.011. Taking of Game by proxy.

We recommend expanding the definition of proxy to allow any individual Alaskan who is

eligible for a moose harvest tag that they do not plan to fill to transfer that tag as a proxy tag to a Community Safety Net Program as defined below.

Proposed Draft Language:

This authorization permits an Alaska resident age 10 and older with a current Alaska hunting license (Proxy Hunter) **to transfer one or more of their available tags to a Community Safety Net Program. Community safety net organizations are defined as: 1. Food Banks and Food Pantries. 2. Emergency shelters. 3. Programs that distribute meals to elders or individuals who experience disabilities. 4. Programs that distribute food to individuals who are experiencing food insecurity. 5. Tribes or tribal consortiums that provide food assistance. 6. Educational institutions that feed students. 7. Tribal health care organizations.**

Eligible programs cannot receive more than the allotted number of donated tags established the Board of Game OR 5% (or a % established by the Board of Game) of all tags issued in the Unit.

Please note: This is our second-preference solution, which we will term “Preference #2”. We will also submit alternative solutions and will rank them in order of our preference.

What is the issue you would like the board to address and why? We would like the Board to address the issue of Proxy Hunting. Currently, proxy hunting: permits an Alaska resident age 10 and older with a current Alaska hunting license (Proxy Hunter) to take....some moose.... For another Alaska resident (Beneficiary) who is blind, 70% physically disabled (affidavit required), 65 years of age or older, or developmentally disabled (affidavit required). A Proxy Hunter may not proxy hunt for more than one Beneficiary at a time, and may possess only one authorization at a time.

We request that the definition of proxy hunting be expanded – in particular we are considering the moose population in Unit 18, but there may be applicability to other areas of the state. We would also like the board to consider allowing the number of proxy tags a hunter can fill on a trip from one tag to two, due to the distance most hunters must travel and expense of filling a tag for the following reasons:

1. Availability of existing population within the Unit.
2. High levels of food insecurity throughout both the Bethel Census Area and the Kusilvak Census Area.
3. To increase the availability of a culturally-appropriate and highly-desired, healthy source of protein to individuals who are a) relying on the food served by or provided by community safety net programs or b) other agencies, such as educational institutions or health care organizations.
4. To provide more opportunities for individuals receiving these resources to participate in hunts and meat processing.

5. To provide easier opportunities for potential hunters who wish to help people, broadly, who are food-insecure/the organizations serving those individuals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We have developed this proposal in coordination with two committees composed of experts from throughout the Yukon-Kuskokwim Delta and elsewhere in Alaska who are examining potential structural interventions to improve food security and food sovereignty in the Yukon-Kuskokwim Delta. One group is called and COMPASS: Community Partnerships to Advance Science and Society. The group and these efforts are funded with a 10-year National institute of Health grant to select structural interventions that could benefit food security and sovereignty in the YK Delta. The other committee is called the HERA: Health Equity Research Assembly. The goal of HERA is to guide the work of COMPASS in selecting the structural interventions and the methods with which those interventions are approached.

We forwarded our drafts to the Board of Game member from Bethel.

We met with staff at our local Department of Fish and Game office.

We plan to discuss our proposals with our local advisory committee but because we are new to this process, we were unfamiliar with their meeting schedule. Those discussions will occur after this submission.

PROPOSED BY: Michelle DeWitt (EG-F24-069)

Note: Game Management Unit 18 is outside the scope of the Statewide Regulations meeting and Alaska Statute 16.05.405 stipulates the requirements for proxy hunting. Please see Proposal 123 which requests a statewide change to allow remuneration for proxy hunting.

PROPOSAL 180

5 AAC 92.011. Taking of game by proxy.

Allow individuals and specific community organizations to provide remuneration to proxy hunters in the form of reimbursement for hunting expenses as follows:

(d A person may not be a proxy

- (1) for more than one beneficiary at a time; **except**

(1a for more than two beneficiaries at a time in Unit 18

- (2) more than once per season per species in Unit 13;
- (3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee.

(4) for more than one person per regulatory year for moose in Units 20(A) and 20(B).

1. A person may not [give or] receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.
2. **A person may give compensation in the form of reimbursement for gas and ammunition to their proxy hunter.**
3. **A community safety net organization may not receive remuneration from a potential proxy hunter in order to obtain, grant or influence the granting of a proxy authorization.**
4. **A community safety net organization may provide remuneration to a proxy hunter in the form of the following: reimbursements for gas, oil, ammunition and repairs required to equipment such as a snow machine or ATV due to failures that occurred on the hunt. Community safety net organizations are defined as: 1. Food Banks and Food Pantries. 2. Emergency shelters. 3. Programs that distribute meals to elders or individuals who experience disabilities. 4. Programs that distribute food to individuals who are experiencing food insecurity. 5. Tribes or tribal consortiums that provide food assistance. 6. Educational institutions that feed students. 7. Tribal**

Note: Internally we have labeled this proposal as Proposal 6. We believe Proposal 7 is a stronger option for incentivizing proxy hunters for food-insecure households and impacting the issue of food insecurity.

What is the issue you would like the board to address and why? We would like to make it easier for community safety net organizations- those organizations distributing food to people who are struggling with food security, organizations that are providing meals to vulnerable populations, educational institutions or health care organizations- to find people willing to proxy moose hunt for participants who are utilizing said organizations to increase their food security by offering reimbursements to the proxy hunters for their effort. The cost of gas, oil, use of personal equipment, expense of ammunition, wear and tear on personal equipment, etc. are barriers for many potential hunters' ability to conduct proxy hunts. We would like to identify a way to incentivize this activity which will lead to increased food security for households struggling with this condition. Additionally, we would like to ensure that for those hunters who do make the effort to travel long distances to fill a proxy tag, that they could fill up to two tags while out on their hunt to conserve gas, equipment use and time.

We believe this proposal would work well in tandem with other proposed changes. We have labeled this Proposal internally as Proposal 6. As for incentivizing proxy hunters, we prefer our Proposal #7.

Eliminating this barrier would:

1. Utilize the currently-available moose population within the Unit for the benefit of individuals in need of improved food security or increased access to traditional foods.
2. Combat high levels of food insecurity throughout both the Bethel Census Area and the Kusilvak Census Area.
3. Increase the availability of a culturally-appropriate and highly-desired, healthy source of protein to individuals who are a) relying on the food served by or provided by community safety net programs or b) other agencies, such as educational institutions or health care organizations.
4. Provide more opportunities for individuals receiving these resources to participate in hunts and meat processing.
5. Provide easier opportunities for potential hunters who wish to help people, broadly, who are food-insecure/the organizations serving those individuals.
6. Provide more efficiency in use of gas, wear and tear on equipment and time by allowing for two proxy tags to be filled at a time per hunter instead of one.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? We have developed this proposal in coordination with two committees composed of experts from throughout the Yukon-Kuskokwim Delta and elsewhere in Alaska who are examining potential structural interventions to improve food security and food sovereignty in the Yukon-Kuskokwim Delta. One group is called COMPASS: Community Partnerships to Advance Science for Society. The group and these efforts are funded with a 10-year National Institute of Health grant to select structural interventions that could benefit food security and sovereignty in the YK Delta. The other committee is called HERA: Health Equity Research Assembly. The goal of HERA is to guide the work of COMPASS in selecting structural interventions and the methods with which those interventions are approached.

We forwarded our drafts to the Board of Game commission member from Bethel.

We met with staff at our local Fish and Game office.

We plan to discuss our proposal with our local advisory committee but because we are new to this process, we were unfamiliar with their meeting schedule. Those discussions will occur after this submission.

PROPOSED BY: Michelle DeWitt (EG-F24-072)

Note: Game Management Unit 18 is outside the scope of the Statewide Regulations meeting and Alaska Statute 16.05.405 stipulates the requirements for proxy hunting. Please see Proposal 123 which requests a statewide change to allow remuneration for proxy hunting.

PROPOSAL 181

5 AAC 92.011. Taking of game by proxy.

Allow individuals and specific community organizations to provide remuneration to proxy hunters in the form of cash, gas cards, and reimbursement for hunting expenses as follows:

(d) A person may not be a proxy

(1) for more than one beneficiary at a time; **except**

(1)a for more than two beneficiaries at a time in Unit 18

(2) more than once per season per species in Unit 13;

(3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee.

(4) for more than one person per regulatory year for moose in Units 20(A) and 20(B).

(v) A person may not [give or] receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.

(vi) A person may give remuneration for gas and ammunition to their proxy hunter.

(vii) A community safety net organization may not receive remuneration from a potential proxy hunter in order to obtain, grant or influence the granting of a proxy authorization.

(viii) A community safety net organization may provide remuneration to a proxy hunter in the form of the following: a stipend not to exceed \$500 per hunt or a total of \$3000 annually as an honorarium for time contributions for filling a proxy tag; a gas card not to exceed \$150 per hunt as an honorarium for filling a proxy tag; reimbursements for gas, oil, ammunition and repairs required to equipment such as a snow machine or ATV due to failures that occurred on the hunt or repair/replacement of other materials damaged or lost on the hunt. Community safety net organizations are defined as: 1. Food Banks and Food Pantries. 2. Emergency shelters. 3. Programs that distribute meals to elders or individuals who experience disabilities. 4. Programs that distribute food to individuals who are experiencing food insecurity. 5. Tribes or tribal consortiums that provide food assistance. 6. Educational institutions that feed students. 7. Tribal health care organizations.

What is the issue you would like the board to address and why? We would like to make it easier for community safety net organizations to find people willing to proxy moose hunt for participants who are utilizing said organizations by offering reimbursements for their effort. The cost of gas, oil, use of personal equipment, expense of bullets, wear and tear on personal equipment, etc. are barriers for many potential hunters' ability to conduct proxy hunts. Additionally, many of those hunters must miss work or time providing for their own household's needs or time with family in order to conduct a proxy hunt. Further incentivizing proxy hunting for the hunter would result in a great benefit to recipient individuals or groups. Additionally, we would like to ensure that for those hunters who do make the effort to travel long distances to fill a proxy tag, that they could fill up to two tags while out on their hunt to conserve gas, equipment use and time.

Eliminating these barriers would:

1. Utilize the currently-available moose population within Unit 18 for the benefit of individuals in need of improved food security or increased access to traditional foods.
2. Combat high levels of food insecurity throughout both the Bethel Census Area and the Kusilvak Census Area.
3. Increase the availability of a culturally-appropriate and highly-desired, healthy source of protein to individuals who are a) relying on the food served by or provided by community safety net programs or b) other agencies, such as educational institutions or health care organizations.
4. Provide more opportunities for individuals receiving these resources to participate in hunts and meat processing.
5. Provide easier opportunities for potential hunters who wish to help people, broadly, who are food-insecure and/or the organizations serving those individuals.
6. Provide more efficiency in use of gas, wear and tear on equipment and time by allowing for two proxy tags to be filled at a time per hunter instead of one.

We believe this proposal would work well in tandem with other proposed changes. Internally, we have labeled this as Proposal 7. As for incentivizing proxy hunters, we prefer this Proposal (#7) over Proposal #6.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? We have developed this proposal in coordination with two committees composed of experts from throughout the Yukon-Kuskokwim Delta and elsewhere in Alaska who are examining potential structural interventions to improve food security and food sovereignty in the Yukon-Kuskokwim Delta. One group is called COMPASS: Community Partnerships to Advance Science for Society. The group and these efforts are funded with a 10-year National Institute of Health grant to select structural interventions that could benefit food security and sovereignty in the YK Delta. The other committee is called HERA: Health Equity Research Assembly. The goal of HERA is to guide the work of COMPASS in selecting structural interventions and the methods with which those interventions are approached.

We forwarded our drafts to the Board of Game commission member from Bethel.

We met with staff at our local Fish and Game office.

We plan to discuss our proposal with our local advisory committee but because we are new to this process, we were unfamiliar with their meeting schedule. Those discussions will occur after this submission.

PROPOSED BY: Michelle DeWitt

(EG-F24-073)

Note: Game Management Unit 18 is outside the scope of the Statewide Regulations meeting and Alaska Statute 16.05.405 stipulates the requirements for proxy hunting. Please see Proposal 123 which requests a statewide change to allow remuneration for proxy hunting.

PROPOSAL 182

5 AAC 92.011. Taking of game by proxy.

Allow individuals and specific community organizations to provide remuneration to proxy hunters in the form of cash, gas cards, and reimbursement for hunting expenses, and allow the organizations to employ specialists to serve as proxy hunters as follows:

(d) A person may not be a proxy

(1) for more than one beneficiary at a time; **except**

(1a for more than two beneficiaries at a time in Unit 18

(2) more than once per season per species in Unit 13;

(3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee.

(4) for more than one person per regulatory year for moose in Units 20(A) and 20(B).

(ix) A person may not [give or] receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.

(x) A person may give remuneration for gas and ammunition to their proxy hunter.

(xi) An organization may not receive remuneration from a potential proxy hunter in order to obtain, grant or influence the granting of a proxy authorization.

(xii) A community safety net organization may provide remuneration to a proxy hunter in the form of the following: a stipend not to exceed \$500 per hunt or a total of \$3000 annually as an honorarium for time contributions for filling a proxy tag; a gas card not to exceed \$150 per hunt as an honorarium for filling a proxy tag; reimbursements for gas, oil, ammunition and repairs required to equipment such as a snow machine or ATV due to failures that occurred on the hunt or repair/replacement of other materials damaged or lost on the hunt.

(xiii) A community safety net organization may employ a specialist who has expertise in traditional subsistence practices who may a) fill proxy tags not to exceed a number identified by the Alaska Dept. of Fish and Game and/or b) apply for cultural educational permits and/or c) develop a community harvest program and/or d) include community safety net organization program participants in the hunts in order to transmit traditional knowledge about hunting practices that will lead to greater future food security for those participants

or e) hunt for the food distributed by the organization or prepared by the organization. A maximum number of moose the organization may harvest will be established by the Alaska Dept. of Fish and Game. Community safety net organizations are defined as: 1. Food Banks and Food Pantries. 2. Emergency shelters. 3. Programs that distribute meals to elders or individuals who experience disabilities. 4. Programs that distribute food to individuals who are experiencing food insecurity. 5. Tribes or tribal consortiums that provide food assistance.

What is the issue you would like the board to address and why? We would like to make it easier for community safety net organizations to fill proxy hunt tags for eligible populations. We would like to accomplish this by clarifying that particular types of organizations may employ an individual who, as part of their job duties, is able to fill proxy hunt tags for eligible tag holders. We request that two proxy tags could be filled per proxy tag holder per hunt to maximize the resources of gas and time that are required for these hunts.

Eliminating these barriers would:

1. Utilize the currently-available moose population within the Unit for the benefit of individuals in need of improved food security or increased access to traditional foods.
2. Combat high levels of food insecurity throughout both the Bethel Census Area and the Kusilvak Census Area.
3. Increase the availability of a culturally-appropriate and highly-desired, healthy source of protein to individuals who are a) relying on the food served by or provided by community safety net programs or b) other agencies, such as educational institutions or health care organizations and/or c) provide more opportunities for individuals receiving these resources to participate in hunts and meat processing with the designated employee.
4. Leverage the knowledge and skills of an individual who possesses those abilities to train and teach others, which will allow the transmission of critical traditional knowledge through culturally-appropriate activities and increase the future food security of food-insecure households by including them in the activities and sharing this knowledge.
5. Provide more efficiency in use of gas, wear and tear on equipment and time by allowing for two proxy tags to be filled at a time per hunter instead of one.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? We have developed this proposal in coordination with two committees composed of experts from throughout the Yukon-Kuskokwim Delta and elsewhere in Alaska who are examining potential structural interventions to improve food security and food sovereignty in the Yukon-Kuskokwim Delta. One group is called COMPASS: Community Partnerships to Advance Science for Society. The group and these efforts are funded with a 10-year National Institute of Health grant to select structural interventions that could benefit food security and sovereignty in the YK Delta. The other committee is called HERA: Health Equity Research Assembly. The goal of HERA is to guide the work of COMPASS in selecting structural interventions and the methods with which those interventions are approached.

We forwarded our drafts to the Board of Game commission member from Bethel. We met with staff at our local Fish and Game office. We plan to discuss our proposal with our local advisory

committee but because we are new to this process, we were unfamiliar with their meeting schedule. Those discussions will occur after this submission.

PROPOSED BY: Michelle DeWitt (EG-F24-074)

Note: Fees for hunting permits and tags are set in Alaska Statute 16.05.340.

PROPOSAL 183

Increase the nonresident Dall sheep tag fee to \$1,700. Increase the Nonresident Alien Dall sheep tag fee to \$2,200. This doubles the states revenue on nonresident sheep tags while still remaining competitive and below the national average of \$2,106. It should be noted that non-resident sheep hunters harvest nearly 50% of the annual sheep harvest.

What is the issue you would like the board to address and why? Non-Resident Dall Sheep tag fees are more than 50% cheaper than the average of the 11 lower 48 western states nonresident wild sheep tag fees. For reference the 2024 nonresident tag fees for the mentioned 11 western states are

- WA-\$1652
- OR-\$1513.50
- CA-\$1986.75
- ID-\$2626.75
- NV-\$1200
- AZ-\$1815
- UT-\$2244
- MT-\$1250
- WY-\$3017
- CO-\$2686.04
- NM-\$3173

The average comes out to \$2,106.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-082)

Note: Establishing hunting zones is an administrative authority exercised by the Department of Fish and Game.

PROPOSAL 184

I recommend a 4-zone management approach. A coastal zone (south of the Kanektok River in Units 18 and 17A), a western zone (remainder of Unit 18), eastern zone (Unit 17B), and southeast zone (Units 17C and 9B)

What is the issue you would like the board to address and why? The Mulchatna caribou herd has declined significantly since the boom of the late 90's. This has "normalized" the herd into a number of smaller herds. By moving to a zoned management approach, smaller herds on the periphery of the MCH range which are stable or increasing may provide some hunting opportunity while protecting other zones from harvest and allowing for growth.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed this concept with local federal and state Mulchatna caribou herd manager but am submitting the proposal individually.

PROPOSED BY: Patrick Walsh (EG-F24-089)

Note: Tier II scoring is based on statutory requirements in Alaska Statute 16.05.258.

PROPOSAL 185

5 AAC 92.070. Tier II subsistence hunting permit point system.

The following question should be added and points awarded appropriately: Do you own land or property within this Tier II hunting zone.

What is the issue you would like the board to address and why? With respect to the Tier II application, currently there are no points awarded to the applicants who own land or property within a tier II hunt area.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The idea was brought up with our advisory committee and we voted to submit this proposal.

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-019)

Note: Federal hunting regulations for migratory birds establish the definition of sea ducks. The proposed change does not comply with federal law.

PROPOSAL 186

5 AAC 92.990. Definitions.

I recommend that the Board change language that “for regulation purposes” defines bufflehead, Barrow’s and Common Goldeneye as dabbling ducks. Bufflehead, Barrow’s and Common Goldeneye are sea ducks with life-history that makes them susceptible to over-harvest and slow recovery, and they should be managed like other sea ducks. I recommend amending definition language on p. 11 of the "Alaska Migratory Bird Hunting Regulations Supplement" as follows:

“All duck species (except sea ducks) count towards the general duck bag and possession limits. **For regulation purposes, bufflehead, Barrow’s and common goldeneyes are included in the general duck bag limit and not considered sea ducks.**” Sea ducks are harlequin duck; long-tailed duck; common and king eider; surf, white-winged, and black scoter; common, hooded and red-breasted merganser; **bufflehead, Barrow’s and common goldeneyes.**”

What is the issue you would like the board to address and why? “For regulation purposes” ADF&G currently defines Bufflehead, common and Barrow’s goldeneye as dabbling ducks. But they are not dabbling ducks, they are sea ducks. According to the Encyclopedia Britannica:

“Sea ducks are any of the approximately 20 species of the tribes Mergini and Somateriini... Ducks of the tribe Mergini include the bufflehead (*Bucephala*, or *Glaucionetta, albeola*), closely related to the goldeneye (*B.*, or *G.*, *clangula*); the mergansers; the oldsquaw (*Clangula hyemalis*); and scoters (*Melanitta*, or *Oidemia*, species). The tribe Somateriini includes the eiders.”

It is important that Bufflehead and Barrow’s and common goldeneyes be managed as sea ducks and not as dabbling ducks, because sea ducks are much more prone to over harvest than dabblers. According to the Sea Duck Joint Venture, sea duck populations are slow to recover for the following reasons:

1. Sea ducks are known to have a remarkable degree of site fidelity—around 5 miles or so—which means that if an area’s population is depressed, birds from other areas will not boost recovery.
2. In general, sea ducks do not breed until they are 2 or 3 or so years old, which is late in comparison darling ducks.
3. They lay only one clutch of eggs per year, in contrast with the 2 or 3 for many dabbling ducks.
4. They have significantly lower chick survival rates than other ducks.

Sea duck populations across the United States have fallen 30% since 1970, and they remain in decline, according to the U.S. Committee of the North American Bird Conservation Initiative’s “2022 State of Birds Report”. On the bright side, the report notes that efforts at conservation have been shown to be effective.

This proposal is supported by three consecutive years of Kachemak Bay Community Science Sea Duck Surveys—a local annual effort of 10 boats and over 30 people. This survey effort started in 2020/21, because residents and hunters in Kachemak Bay noticed a significant increase to sea duck hunting pressure, as a result of the arrival of a few more guides. Local birders began monitoring populations to create a population index. Our population index does not aim to estimate total number of birds in Kachemak Bay, but by focusing on a few areas with dense sea duck populations, we are able to see population trends—an approach used by ADF&G managers across many species in Alaska. Our data shows that populations have not bounced back after a significant harvest. Fish and Game has historically monitored sea duck populations in Kachemak Bay, but they have not surveyed in Kachemak Bay since several years before community science surveys began, so our data is the only record of this trend.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Penelope Haas

(HQ-F24-031)
