

# **King Salmon Area – Units 9 & 10**

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## **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)

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## **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?**

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**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:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(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	<b><u>Aug. 1–Oct. 21</u></b> [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).

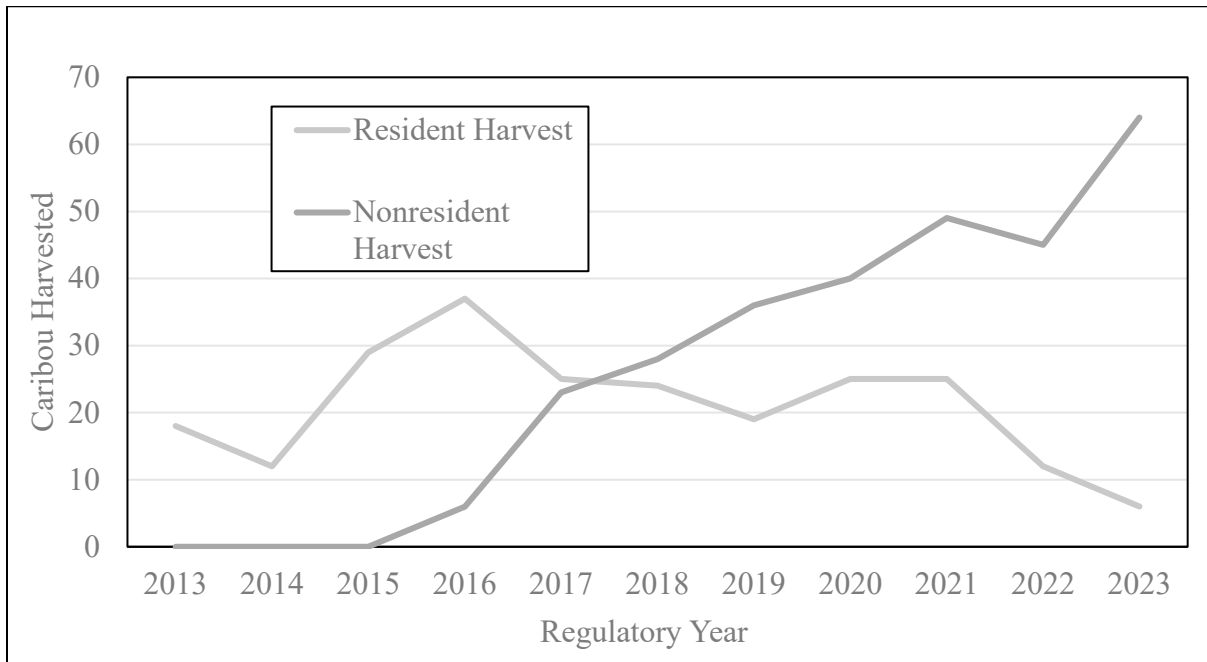


Figure 7.1. Caribou harvested by residents and nonresidents for the Southern Alaska Peninsula caribou herd.

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)  
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**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)  
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**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)

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**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)  
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**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)  
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**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)  
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**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)  
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**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)

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**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)

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**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)

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**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)  
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**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)  
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**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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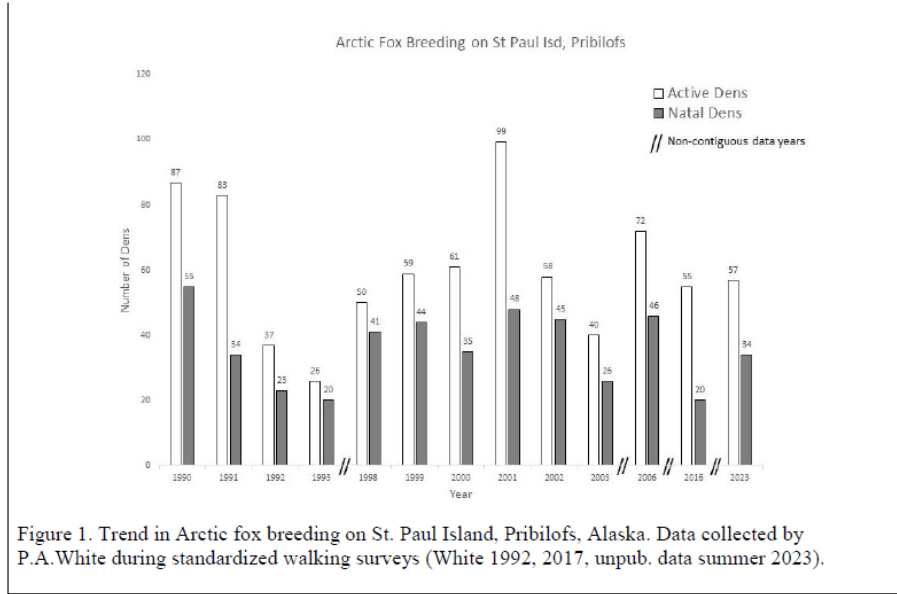
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*Continued on next page.*



**PROPOSED BY:** Paula White, PhD

(HQ-F24-034)

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**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)  
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**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:

<b>Species and Units</b>	<b>Open Season</b>	<b>Bag Limit</b>
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(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)  
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**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)

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*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)

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**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:

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