

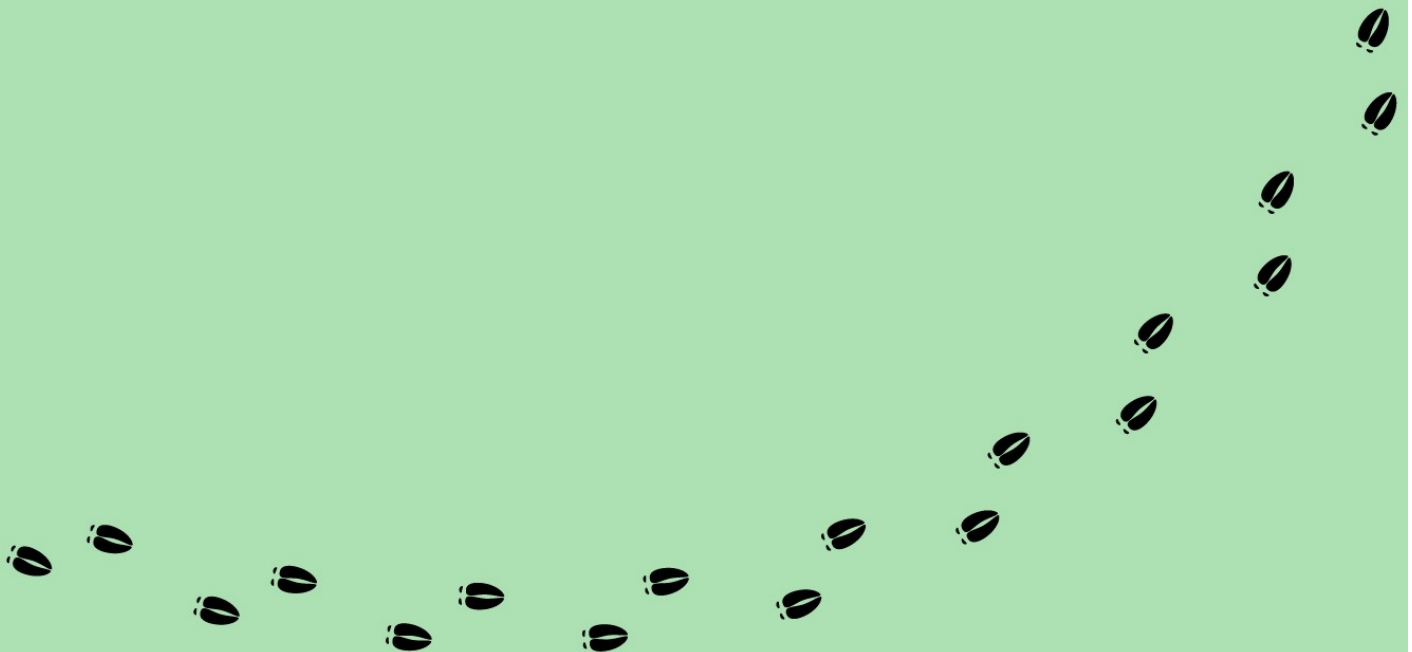


**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**

## **THE ALASKA BOARD OF GAME**

### **2020/2021 Proposed Changes to Regulations**

- **Central & Southwest Region**
- **Statewide Regulations**





## Alaska Board of Game

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

Dear Reviewer,

September 2020

The Alaska Board of Game (board) will consider the enclosed regulatory proposals at the board meetings scheduled for **January and March 2021**. The proposals primarily concern changes to hunting and trapping regulations pertaining to the Central & Southwest Region (Game Management Units 9, 10, 11, 13, 4A, 14B, 16, and 17) and changes to statewide provisions under 5 AAC Chapters 92 and 98. Proposals have been submitted by members of the public, organizations, advisory committees, the Alaska Department of Fish and Game (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 presented as brief statements summarizing the intended regulatory changes. In cases where confusion might arise or where the regulation is complex, proposed changes are indicated in legal format. In this format, bolded and underlined words are **additions** to the regulation text, and capitalized words in square brackets are [DELETIONS].

Readers are encouraged to view all proposals in this book as some proposals may affect other regions and units. 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 proposals to be deliberated on, also known as the “roadmap,” will be available at least 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 comment, 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 these proposals are encouraged to provide written or oral comments if they wish to have their views considered by the board. Please review the additional information for providing written comment and testimony to the board on page v.

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

Online: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)  
Email: [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov) (PDF attachment only)  
Fax: 907-465-6094  
Mail: ADF&G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526 | Juneau, AK 99811-5526

Meeting information, documents, and a link to the audio is available through the Board of Game website at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov) or through the ADF&G Boards Support Section. Please watch the website for notices and updates closer to the meeting dates, or sign up at the same link to receive notices about the Board of Game. Preliminary board actions will also be posted on the website during the meeting, followed by final actions after the meeting.

Persons with a disability needing special accommodations in order to comment on the proposed regulations should contact the Boards Support Section at (907) 465-4110 at least two weeks prior to the scheduled 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, flowing style.

Kristy Tibbles, Executive Director  
Alaska Board of Game

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## Guidelines for 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 for being effective with submitting written comments and giving testimony.

### **GUIDELINES FOR WRITTEN COMMENTS**

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Timely submission: Written comments are strongly encouraged to be submitted online at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov) by the set deadline for each meeting, usually two weeks in advance. Comments received by the deadline are provided to the board and the public on the meeting information webpage in advance of the meeting and are 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; after the deadline, comments are limited to ten single-sided pages.
- If commenting on multiple proposals, please do not use separate pieces of paper.
- 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 after the deadline: Written comments may be submitted after the deadline via mail, fax or hand-delivery. Comments received after the deadline are not cross-referenced with proposals and are distributed to board members and the public at the meeting. They are logged as “record copies” (also referred to as “RC”) with an assigned log number. Requirements are the same as above. Comments submitted at the meeting must include 20 copies for the public distribution. It is not the responsibility of Boards Support staff to make the copies for you.

## GUIDELINES FOR ORAL PUBLIC TESTIMONY

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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) representatives may elect to provide testimony at a later portion of the meetings.

Persons planning to testify at Board of Game meetings must submit a **PUBLIC TESTIMONY SIGN-UP CARD** (blue card) to the Boards staff prior to the announced cut-off time. If submitting written comments at the meeting along with oral testimony, at least **20 copies** must be provided. PowerPoint presentations may be provided when testifying at meetings as long as 20 copies of the presentation are provided and Boards Support staff are notified in advance to arrange the equipment. Written material submitted during the board meetings will be logged with a record copy (“RC”) number, which should be referenced at the time of testimony.

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. Follow the tips for comments shown on page v.

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 and each testimony is allotted its own time. **If you are giving testimony for yourself and an organization or an AC**, you only need to turn in one sign-up card naming 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 individual comments.

The length of testimony time will be announced on the agenda just prior to meeting and by the board chair at the beginning of the meeting. The board typically allows five minutes for oral testimony for an individual or an 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.



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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: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov).

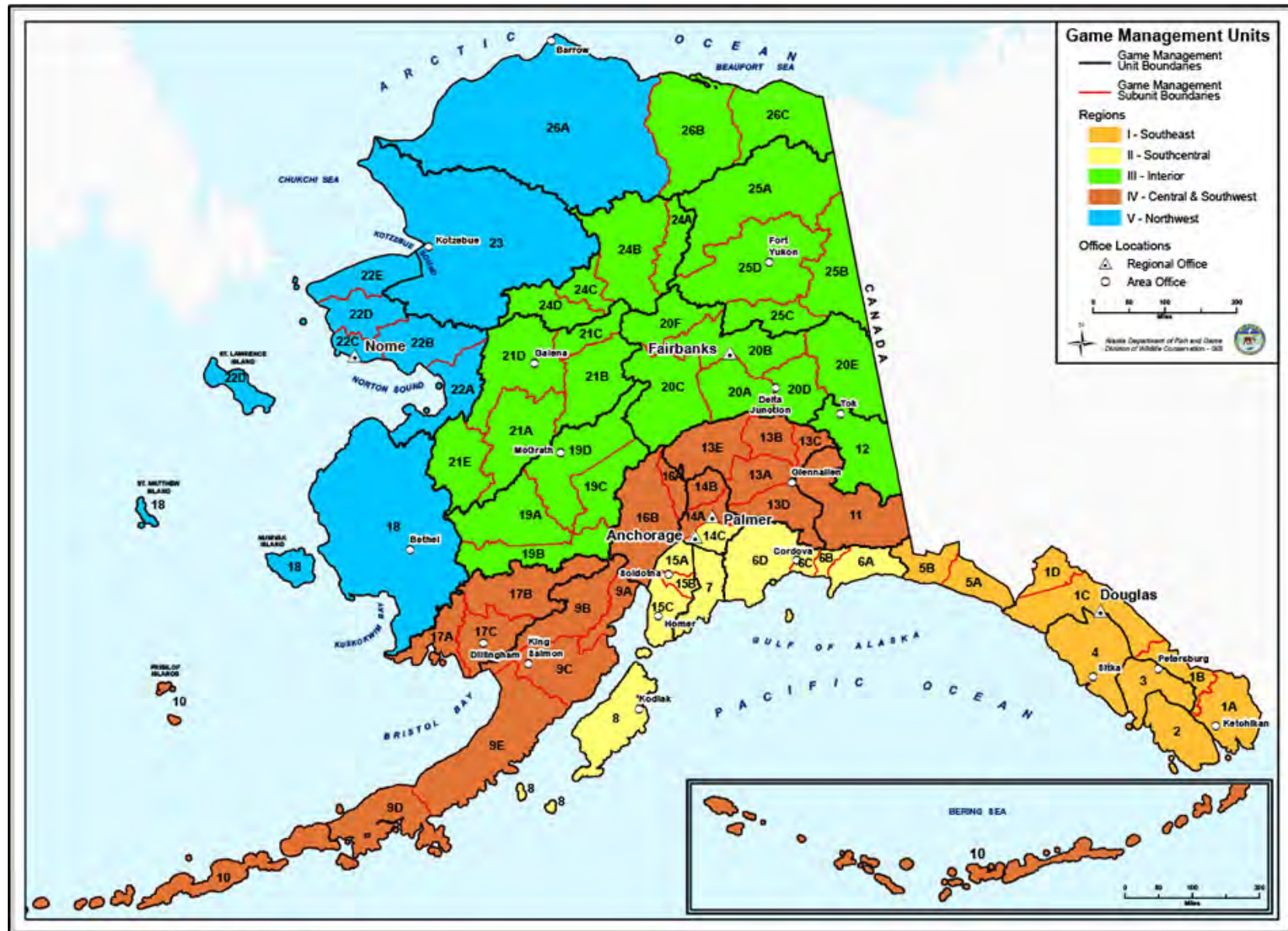
### **Advisory Committees**

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: [www.advisory.adfg.alaska.gov](http://www.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 xiv.

## Region and Game Management Unit Boundaries



U:\WCI\Map\AK Maps\GMU Map\_6.5x9\_color.mxd 7/9/2014 sst

## Commonly Used Acronyms & Terms

<b>AAC</b>	Alaska Administrative Code	<b>Region III</b>	Interior & Eastern Arctic Region – Game Management Units 12, 19, 20, 21, 24, 25, 26B & 26C
<b>AC</b>	Advisory Committee	<b>Region IV</b>	Central/Southwest Region – Game Management Units 9, 10, 11, 13, 14A, 14B, 16 & 17
<b>ADF&amp;G</b>	Alaska Department of Fish and Game	<b>Region V</b>	Western Arctic/Western Region – Game Management Units 18, 22, 23 & 26A
<b>ANS</b>	Amount Necessary for Subsistence	<b>RAC</b>	Federal Regional Advisory Council
<b>AS</b>	Alaska Statute	<b>SAP</b>	Southern Alaska Peninsula caribou herd
<b>AWT</b>	Alaska Wildlife Troopers	<b>SHS</b>	Selective Harvest Strategy
<b>BOG/Board</b>	Board of Game	<b>UCH</b>	Unimak Island caribou herd
<b>BGCSB</b>	Big Game Commercial Services Board	<b>USFWS</b>	U.S. Fish and Wildlife Service
<b>C.I.</b>	Confidence Interval	<b>USFS</b>	U.S. Forest Service
<b>C&amp;T</b>	Customary and Traditional U	<b>WAA</b>	Wildlife Analysis Area
<b>CUA</b>	Controlled Use Area	<b>2DK</b>	Second degree of kindred
<b>DHCMA</b>	Dalton Highway Corridor Management Area	<b>Permit Hunt Abbreviations</b>	
<b>DWC</b>	Division of Wildlife Conservation	<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>	
<b>EO</b>	Emergency Order	<b>RB</b>	Registration brown bear
<b>FSB</b>	Federal Subsistence Board	<b>RC</b>	Registration caribou
<b>GMU/Unit</b>	Game Management Unit	<b>RG</b>	Registration goat
<b>GSPE</b>	Geospatial Population Estimator	<b>RL</b>	Registration black bear
<b>GUA</b>	Guide Use Area	<b>RM</b>	Registration moose
<b>HGL</b>	Harvest Guideline Level	<b>RX</b>	Registration Musk ox
<b>IM</b>	Intensive Management Area	<b>DB</b>	Drawing brown bear
<b>NAP</b>	Northern Alaska Peninsula caribou herd	<b>DC</b>	Drawing caribou
<b>NPS</b>	National Park Service	<b>DG</b>	Drawing goat
<b>OSM</b>	Office of Subsistence Management, U.S. Dept. of the Interior	<b>DL</b>	Drawing black bear
<b>RY</b>	Regulatory Year; July 1- June 30	<b>DM</b>	Drawing moose
<b>Region I</b>	Southeast Region – Game Management Units 1, 2, 3, 4, & 5	<b>DS</b>	Drawing sheep
<b>Region II</b>	Southcentral Region – Game Management Units 6, 7, 8, 14C, & 15	<b>DX</b>	Drawing must ox
		<b>YM</b>	Youth moose

**Alaska Board of Game**

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[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)**ALASKA BOARD OF GAME****2020/2021 Cycle****Tentative Meeting Dates**

<b>Meeting Dates</b>	<b>Topic</b>	<b>Location</b>	<b>Comment Deadline</b>
<b>January 21, 2021</b> (1 day)	<b>Work Session</b>	<b>Wasilla</b> Best Western Lake Lucille Inn	<b>January 15, 2021</b>
<b>January 22-29, 2021</b> (8 days)	<b>Central &amp; Southwest Region</b> Game Management Units 9, 10, 11, 13, 14A, 14B, 16 & 17	<b>Wasilla</b> Best Western Lake Lucille Inn	<b>January 8, 2021</b>
<b>March 12-19, 2021</b> (8 days)	<b>Statewide Regulations</b> 5 AAC Chapters 92 and 98	<b>Fairbanks</b> Pike's Waterfront Lodge	<b>February 26, 2021</b>

Total Meeting Days: 17

**Agenda Change Request Deadline: Sunday, November 1, 2020***(The Board of Game will meet via teleconference to consider Agenda Change Requests following the November 1 deadline.)*



## Alaska Board of Game

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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

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 are considered once every three years at Statewide Regulations meetings.

The proposal deadline is May 1 every preceding year. If May 1 falls on a weekend, the deadline is the Friday before. 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
<b>Southeast Region - Game Management Units: 1, 2, 3, 4, 5</b> <i>Meeting Cycle: 2021/2022 2024/2025 2027/2028</i>
<b>Southcentral Region - Game Management Units: 6, 7, 8, 14C, 15</b> <i>Meeting Cycle: 2021/2022 2024/2025 2027/2028</i>
<b>Western Arctic / Western Region - Game Management Units: 18, 22, 23, 26A</b> <i>Meeting Cycle: 2022/2023 2025/2026 2028/2029</i>
<b>Interior and Eastern Arctic Region - Game Management Units: 12, 19, 20, 21, 24, 25, 26B, 26C</b> <i>Meeting Cycle: 2022/2023 2025/2026 2028/2029</i>
<b>Central and Southwest Region - Game Management Units: 9, 10, 11, 13, 14A, 14B, 16, &amp; 17</b> <i>Meeting Cycle: 2020/2021 2023/2024 2026/2027</i>
<b>Statewide Regulations*</b> (see next page) <i>Meeting Cycle: 2020/2021 2023/2024 2026/2027</i>
<i>*5 AAC 92.037. Permits for falconry is scheduled every six years: 2020/2021 2026/2027 2032/2033</i>

**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\*
- 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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### Board of Game Members

<u>NAME AND ADDRESS</u>	<u>TERM EXPIRES</u>
Stosh (Stanley) Hoffman, Bethel, Chair <a href="mailto:Stosh.hoffman@alaska.gov">Stosh.hoffman@alaska.gov</a>	6/30/2023
Larry Van Daele, Kodiak, Acting Vice-chair <a href="mailto:Larry.vandaele@alaska.gov">Larry.vandaele@alaska.gov</a>	6/30/2021
Jerry Burnett, Juneau <a href="mailto:Jerry.burnett@alaska.gov">Jerry.burnett@alaska.gov</a>	6/30/2021
Allen Barrette, Fairbanks <a href="mailto:Allen.barrette@alaska.gov">Allen.barrette@alaska.gov</a>	6/30/2022
Orville Huntington, Huslia <a href="mailto:Orville.huntington@alaska.gov">Orville.huntington@alaska.gov</a>	6/30/2022
Lynn Keogh, Wasilla <a href="mailto:Lynn.keogh@alaska.gov">Lynn.keogh@alaska.gov</a>	6/30/2023
Jacob Fletcher, Talkeetna <a href="mailto:Jacob.fletcher@alaska.gov">Jacob.fletcher@alaska.gov</a>	6/30/2023

\*\*\*\*\*

Alaska Board of Game members may also be reached by contacting

Kristy Tibbles, Executive Director, Alaska Board of Game

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## **Boards Support Section Staff**

### **HEADQUARTERS**

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Physical address: 1255 West 8<sup>th</sup> Street, Juneau, AK  
Phone: 465-4110; Fax: 465-6094

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**Glenn Haight**, Executive Director II  
465-6095, [glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)

**Jessalynn Rintala**, Publications Specialist II  
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#### **BOARD OF GAME**

**Kristy Tibbles**, Executive Director I  
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**Annie Bartholomew** Publications Specialist II  
465-4046, [annie.bartholomew@alaska.gov](mailto:annie.bartholomew@alaska.gov)

### **REGIONAL OFFICES / REGIONAL COORDINATORS**

Southeast Region (north of Frederick Sound)  
**Annie Bartholomew**  
(see above contact info)

Southeast Region (south of Frederick Sound)  
**Jessalynn Rintala**  
(see above contact info)

Southcentral Region  
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Southwest Region  
**Taryn O'Connor-Brito**  
P.O. Box 1030  
Dillingham, AK 99576  
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# Central & Southwest Region

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**ALASKA BOARD OF GAME  
Central & Southwest Region Meeting  
Best Western Lake Lucille Inn, Wasilla, Alaska  
January 22-29, 2021**

**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 22, 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 23, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

**Sunday, January 24, 9:00 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

**Monday, January 25 through Thursday, January 28, 8:30 a.m.**

BOARD DELIBERATIONS continued

**Friday, January 29, 8:30 a.m.**

BOARD DELIBERATIONS continued/conclude

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

**Agenda Notes**

- A. 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](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. 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**

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### **PROPOSAL 1**

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

Shift to later moose hunting seasons in Units 13 and 14 as follows:

**Solution:** Shift hunting windows later in the year for impacted areas such as mine in Unit 13 and 14, whereas the hunting season ends on September 20th. Ending the moose season near October 9th would allow cooler temperatures to set in, and also aid in the ease of meat preservation.

**What is the issue you would like the board to address and why?** Moose hunting in Alaska needs to be moved back later in the season. Why: Alaska's climate has changed or shifted to where September months are not conducive to hunting, whereas temperatures are warmer than in years past. This has a negative effect on moose activities. Warmer temperatures will keep moose bedded down in the day and less active, it has also been observed that the rut is being delayed by warmer temperatures. These changes have put hunters at a growing and compounding disadvantage.

**PROPOSED BY:** Sean McKenney (EG-F20-017)

\*\*\*\*\*

### **PROPOSAL 2**

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

Establish registration archery seasons for Dall sheep in Units 9B, 11, 13, 14A, 14B and 16 as follows:

Regulatory language: (for Units 9B, 11, 13, 14A, 14B and 16)

Resident: One ram, with full curl horn or larger, by bow and arrow only from August 1 - August 5, by registration permit available at <http://adfg.alaska.gov>. Certified bowhunters only.

Nonresident: One ram, with full curl horn or larger, by bow and arrow only, every four regulatory years from August 1 - August 5, by registration permit available at <http://adfg.alaska.gov>. Certified bowhunters only.

\*\*\* Optional addition: Any hunter participating in this registration archery hunt may only hunt sheep with bow and arrow during this regulatory year in the unit where they took advantage of the archery season, including during the general season from August 10 - September 21.

**What is the issue you would like the board to address and why?** There is an increasing interest in bowhunting opportunities for Dall sheep in Alaska but, aside from very low odds draw tags, there are currently no archery seasons or areas for sheep hunting in the Central/Southwest Region. This is a proposal for a resident and nonresident, August 1 – August 5 registration archery season for full curl Dall Sheep in Units 9B, 11, 13, 14A, 14B and 16.

During the regular rifle season, bowhunting is difficult to safely achieve given the overall popularity of sheep hunting and the ability of rifle hunters to take very long shots. Bowhunters often spend many hours to days attempting to get within bowrange of a particular ram and rifle hunters can easily interfere with any chance of a successful bowhunt. In the worst case, it's even possible for rifle hunters to unknowingly shoot over the backs of bowhunters stalking sheep, especially in more popular and easily accessible areas.

In addition, there are many nonresident bowhunters who would welcome an opportunity for a guided bowhunt outside of the regular sheep season. Such a season would provide additional revenue for guiding operations and make Alaska a more competitive and appealing option for nonresidents bowhunters planning to book a sheep hunt.

In the past, early bow seasons were rejected by the Board of Game, in part, because of concern that bowhunters would push sheep out of certain areas just prior to the season. In this proposal the bow season would match the existing youth season, August 1 – August 5, thereby giving the sheep a five-day break from hunting all pressure prior to the general season.

A bowhunting season in Units 9B, 11, 13, 14A, 14B and 16 would provide a wonderful opportunity for bowhunters to spend time safely in the mountains and is very unlikely to impact sheep populations and numbers of legal rams. Over the ten-year period from 2009-2018 bowhunters killed about 1% of legal rams taken in the Alaska's general season. Even in the DS140/141 and DS240/241, which are bowhunting only draw hunts for *any ram* in an easily accessible area, the success rate over the same ten year period was about two – three 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.

Combined with a short season that is separated from the general season by five days and a very low projected success rate, there is no downside to allowing bowhunters an opportunity to safely pursue sheep each season in this region. It would simply allow bowhunters a short window each year to pursue sheep in a safer and more enjoyable fashion.

Making this a registration hunt would allow for accurate statistics about harvest and use.

\*\*\* Optional: In the interest of fairness and of bowhunters being willing to make sacrifices to gain the privilege of a bowhunting season, this hunt could be combined with a “choose your weapon” condition whereby any bowhunter who takes advantage of this archery season would be restricted to hunting with bow and arrow only during the remainder of the regulatory season for the unit where he or she hunted the special archery season. This should help assuage concerns that bowhunters have an “unfair advantage” of any kind and would demonstrate the commitment of archery hunters. This type of “choose your weapon” regulation has been implemented successfully in other states where it is popular with both bow and rifle hunters. Bowhunters not participating in the registration hunt, who only hunt the current general season (8/10 - 9/21), would not be subject to “choose your weapon” regulation.

**PROPOSED BY:** Paul Forward

(EG-F20-167)

\*\*\*\*\*

### **PROPOSAL 3**

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

Open an archery only season for Dall sheep in Units 13, 14A, 14B, and 16 as follows:

Establish an archery only season in Units 13, 14A, 14B and 16 from **September 21 to October 10.**

**What is the issue you would like the board to address and why?** Establish an archery only sheep season in Units 11, 13, 14A, 14B and 16 from September 21 to October 10.

There was an average of 618 rams taken per year from the years 2009 to 2018. The average number of rams taken with archery equipment per year during that same time span, was a total of eight rams. This equates to less than 1.5% of the take of legal rams from 2009 to 2018.

Given the Alaska Department of Fish and Game (ADF&G) data above it seems reasonable to assume there is no biological concern with regards to bowhunters and their potential impact they would have with a lengthened season. This would be available to both residents and nonresidents, allowing guides to extend their season for bowhunting clients. This also would influence sheep hunters to opt out of hunting during the general season with a rifle to plan a bow hunt for the later season. It must also be understood that weather alone could complicate the logistics to hunt sheep during this season extension and therefore potentially decrease the success rate with archery equipment even greater. There would be no need for a registration permit as the prior given data suggests no biological concern and harvested rams already must be sealed by ADF&G.

**PROPOSED BY:** Herb Mansavage

(HQ-F20-015)

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### **PROPOSAL 4**

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

Establish a registration hunt by bow and arrow only for Dall sheep within Units 9, 11, 13A, 13B remainder, 13C remainder, 13D remainder, 14A remainder, 14B, and 16 as follows:

Institute a registration hunt for certified bowhunters only beginning September 21 and ending on October 10 or by emergency order. This registration hunt would be for the same areas already open to general harvest ticket in the earlier season.

Bag limit of one ram with full-curl horn or larger for residents.

Bag limit of one ram with full-curl horn or larger every four regulatory years for nonresidents.

**What is the issue you would like the board to address and why?** Aside from drawing permit hunts, there are currently no opportunities in this region of Alaska for bowhunters to pursue Dall sheep without the presence of rifle hunters.

With large numbers of hunters afield and the ability of rifle hunters to kill sheep at long distances, bowhunters often struggle to find areas to hunt where they can safely stalk close to animals without fear of being exposed to crossfire and other forms of interference.

A solution to these problems is to establish an archery only sheep season in Units 9, 11, 13, 14A, 14B and 16 from September 21st to October 10th.

From 2009 to 2018, there was an average of 618 rams taken per year. The average number of rams taken with archery equipment per year, during that same time span, was eight rams. This shows that bowhunters accounted for 1.3% of the average harvest of rams over 10 seasons.

The purpose of this new hunt being a registration hunt would be so that the Alaska Department of Fish and Game can monitor the participation and success rates more closely. Establish registration Dall sheep bow hunting only season

Having an additional hunt open to nonresidents would bring in more revenue to the State of Alaska as well as to local communities.

Providing a designated archery season for sheep would provide additional hunting opportunities for residents and guided nonresidents with essentially no impact on rifle hunters or sheep populations.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F20-056)  
\*\*\*\*\*

## **PROPOSAL 5**

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

Establish three archery registration hunts for Dall sheep in Units 9, 11, 13, 14, and 16 where there are general season hunts as follows:

In Units 9, 11, 13, 14A, 14B and 16 where there is a general season (harvest ticket) sheep hunt, there would be established three registration hunts for conventional bow and arrow (bowhunter certification required). The dates for each registration hunt would be as follows: August 1 - August 9; September 21 - September 30 and October 1 - October 10. A legal sheep would be a full curl ram (or eight or greater years old or double broomed). A hunter could register for and hunt all three hunts but would have to register for each one separately after returning from the field from each hunt. Registration could be online or in person. The later hunts could be closed by Alaska Department of Fish and Game (ADF&G) by emergency order.

**What is the issue you would like the board to address and why?** The function of the Board of Game should be to NOT ONLY issue restrictions to hunting but should also be to increase hunting opportunities where reasonable and in a fashion that would be of no biologic impact to the species being hunted. Many states in the Lower 48 have established long archery seasons both before and after the regular firearms seasons. As a result archery hunting has been growing in numbers, while the overall number of hunters in most states has been declining. This has potentially caused serious

problems with Pittman-Robertson funding of some states game management and conservation programs. The issue is a request for the Board of Game to identify areas and species where hunting opportunities can be increased with minimal impact on the species being hunted.

A good example would be archery (conventional bow and arrow) sheep seasons both before and after the usual firearms season. Bowhunters would appreciate the chance to hunt sheep at a time when there was no competition from firearms hunters. This proposal would be for a conventional bow and arrow sheep season. It would be a registration hunt so that ADF&G could accurately keep track of participation and success rates. Legal sheep would be Mature Rams Only as defined by full curl, eight years old or older or double broomed, which is the same as for the firearms hunts. ADF&G has already stated that with those restrictions there should be no harm to the sheep population. Note that these hunts would be available to both residents and nonresidents (who would still require a guide). This would give guides an opportunity to sell additional hunts if they were willing to take bowhunters.

**PROPOSED BY:** John Frost

(EG-F20-124)

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## **PROPOSAL 6**

### **5 AAC 92.015. Brown bear tag fee exemptions.**

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

#### **5AAC 92.015. Brown bear tag fee exemptions.**

- (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 of Game (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 bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 and are managed as a trophy species. However, brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The liberalized bear seasons and bag limits adopted 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 for hunters who take brown bears primarily for their meat.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-053)

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## **PROPOSAL 7**

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

Increase bag limit for black bear in Units 13D and 16 as follows:

Change the bag limit of black bears in Units 13D and 16 from three every regulatory year to five every regulatory year.

**What is the issue you would like the board to address and why?** There is an abundance of black bears in Units 16 and 13D with a bag limit of three bears. I would like to see the bag limit increased to five black bears every regulatory year in these units for both residents and nonresidents. These units have dense black bear populations and giving some hunters the

opportunity to harvest more of this surplus of black bears will have no negative effect on the population.

**PROPOSED BY:** Dan Montgomery (EG-F20-047)

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## **PROPOSAL 8**

### **5 AAC 84.270. Furbearer trapping.**

Shorten coyote trapping season in Units 9, 13, 14B, 16 and 17 as follows:

Unit 9 (October 1 - April 30) November 10 - March 31

Units 13 and 16 (October 15 - April 30) November 10 - March 31

Units 14B and 17 (November 10 - April 30) November 10 - March 31

**What is the issue you would like the board to address and why?** Shorten the coyote trapping season. Coyotes are harvested for fur not food. Current seasons were set for various reasons one being the hope lamb predation would be reduced. There is no data to support this that I know of. Coyote fur is better in November and March than October and April. Aligning the opening date of coyote season with most other furbearers will help eliminate by-catch problems. Citations have been issued for failure to salvage and/or surrender other furbearers taken during early coyote season.

**PROPOSED BY:** Tom Lessard

(EG-F20-021)

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## **PROPOSAL 9**

### **5 AAC 84.270. Furbearer trapping**

Extend the wolf trapping season in Units 13 and 16 as follows:

October 15th – May 31st [April 30th].

**What is the issue you would like the board to address and why?** Extend the season for wolves in Units 13 and 16 to May 31st.

Snow conditions in these units many times allow for travel by snowmachine far past the current season closure. This would give trappers the ability to extend their season during late snow years and potentially allow for trapping areas that would have normally been closed but their snow conditions allow for travel. Hides would still be in great condition at this time of year and would allow for potential access into areas that would be extremely difficult to reach during the middle of winter. This season already has no limit on wolves, therefore there is no biological concern.

**PROPOSED BY:** Herb Mansavage

(HQ-F20-013)

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## **PROPOSAL 10**

### **5 AAC 84.270. Furbearer trapping.**

Allow the harvest of beaver by bow and arrow under a trapping license with salvage requirements in Units 9, 11, 13, and 16 as follows:

From page 31 of the Alaska trapping regulations summary book:

It is against the law to take beaver by any means other than a steel trapper snare except:

**In Units 9, 11, 13, 16 and 17 beaver may be taken throughout the trapping season with firearms or bow and arrow as long as the hide or meat is salvaged.**

[IN UNITS 9 AND 17 FROM APRIL 15 - MAY 3, A FIREARM MAY BE USED TO TAKE 2 BEAVER PER DAY PROVIDED THAT THE MEAT IS SALVAGED FOR HUMAN CONSUMPTION; AND IN UNIT 17 A FIREARM OR BOW AND ARROW MAY BE USED TO HARVEST BEAVER FROM DECEMBER 1 - APRIL 14, PROVIDED THAT THE MEAT IS SALVAGED;]

[AND IN UNIT 16 A FIREARM MAY BE USED TO TAKE BEAVER THROUGHOUT THE TRAPPING SEASON.]

**What is the issue you would like the board to address and why?** There is significant discrepancy in the legal method and means for taking beaver in the Central/Southwest Region. There is apparently no scarcity of beaver because there is no limit to the bag limits. This proposal would simplify the regulations for legal method and means for harvesting beaver and make them uniform over most of the units within this region. In most of Interior/Northeast it is legal to take beaver with steel traps, snares, firearms and bow and arrow. In most of western Alaska it is legal to "shoot" (does not specify firearms) beaver throughout the season as long as the hide or meat is salvaged. There seems to be no good reason to prohibit taking beaver using firearms or bow and arrow during the entire trapping season in Units 9, 11, 13, 16 and 17 as long as the hide or meat is salvaged.

**PROPOSED BY:** John Frost

(EG-F20-096)

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## **PROPOSAL 11**

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

Add bow and arrow as legal method of take for beaver in Units 9, 11, 13, and 16 as follows:

(3) taking beaver by any means other than a steel trap or snare, except that a firearm **or bow and arrow** may be used to take two beaver per day in Units 9 and 17 from April 15 through May 31 if the meat is salvaged for human consumption; **a bow and arrow may be used to take beaver in Unit 9, 11, 13 and 16 throughout the seasons and with the bag limits established in 5 AAC 84;** a firearm may be used to take beaver in Units 1-5, 8, 16, 18, 22, and 23 throughout the seasons and with the bag limits established in 5 AAC 84; a firearm or bow and arrow may be used to take beaver in Unit 17 from Dec. 1 through April 14 if the meat is salvaged; a firearm or

bow and arrow may be used to take beaver in Units 12, 19, 20(A), 20(C), 20(E), 20(F), 21, 24, and 25 throughout the seasons and with the bag limits established in 5 AAC 84;

**What is the issue you would like the board to address and why?** If firearms are already a legal method of taking a beaver under trapping regulations, a bow and arrow should be added as well. Currently it is legal to harvest beaver with a firearm or bow and arrow under the trapping regulations in Unit 17 from December 1- April 14 provided the meat is salvaged. It is also legal to harvest beaver in Units 9 and 17 with firearms from April 15-May 31 provided the meat is salvaged but bow and arrow is for some reason not included. Also, in Unit 16 beaver harvest is legal with a firearm throughout the trapping season and again, the use of bow and arrow is not included.

A bow and arrow can be a more effective as well as safer means of harvesting beaver. Actual advantages over a firearm are better ability to continue momentum through the water with less risk of ricochet as is likely when a firearm is discharged toward water surfaces. In addition, beaver shot with firearms may have a higher loss rate than arrow harvested beaver especially if a line is attached to the arrow. Also, arrows are far less likely to damage fur and meat than bullets or shot.

**PROPOSED BY:** Alaskan Bowhunters Association

(EG-F20-098)

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## **Dillingham Area Proposals – Unit 17**

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### **PROPOSAL 12**

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

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

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(15)		
Unit 17(A)		
Up to 2 moose per regulatory year, only as follows:		
<b>RESIDENT HUNTERS:</b>		
1 moose by registration permit only; or	Aug. 25–Sept. 25 (Subsistence hunt only)	
1 antlered bull by registration permit; during the period Dec. 1 –Last day of Feb. a season of up to 31 days may be announced by emergency order; or	Winter Season to be announced by emergency order (Subsistence hunt only)	
1 antlerless moose by registration permit; during the period Dec. 1 –Last day of Feb. a season of up to 31 days may be announced by emergency order;	Winter Season to be announced by emergency order (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 of Game (board). The board adopted an antlerless moose hunt in Unit 17A in support of the Unit 17A Moose Management Plan, which was modified during a meeting of the Unit 17A Moose Management Planning Group in December 2012. The planning group consists of entities interested in the management of this moose population and includes representatives from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game.

According to the third goal of the revised Unit 17A Moose Management Plan, antlerless moose hunting opportunity can be offered when the population is above 600 moose and increasing. The revised plan also recommends that when the population exceeds 1,200 moose a bag limit of up to two moose is established. Based on the most recent survey with good conditions in March 2017, both conditions have been met with a population estimate of 1,990 moose  $\pm 437$ . The bag limit of two moose and antlerless harvest opportunity provides a mechanism to limit population growth and allows hunters to harvest surplus animals.

The moose population in subunit 17A is growing 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.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-067)  
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### **PROPOSAL 13**

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

Increase the number of nonresident draw hunt permits and extend the nonresident season by 10 days in Unit 17A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 17(A)		
Up to 2 moose per regulatory year, only as follows:		
RESIDENT HUNTERS:		
1 moose by regulatory permit only, or	Aug. 25–Sept. 25 (Subsistence hunt only)	
1 antlered bull by registration permit; during the period Dec. 1–Last day of Feb. a season of up to 31 days may be announced by emergency order; or	Winter season to be announced by emergency order (Subsistence hunt only)	
1 antlerless moose by registration permit; during the period Dec. 1–Last day of Feb. a season of up to 31 days may	Winter season to be announced by emergency order (Subsistence hunt only)	

be announced by emergency order;

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to [50] **100** permits may be issued.

Sept. 5–[Sept 15] **Sept. 25**

...

**What is the issue you would like the board to address and why?** Based on the most recent population survey in March of 2017 the point estimate was 1,990 moose  $\pm 437$  in Unit 17A. The management objectives are to maintain a population of 1,100-1,700 moose. The moose population in Unit 17A is growing and can sustain additional harvest, and winter hunt quotas have rarely been met in the last four years. Out of concern for over-browsing which would impact the quality and quantity of forage available for moose in Unit 17A, additional harvest opportunities are warranted by extending the nonresident hunting season by 10 days and increasing the “up to” number of permits from 50 to 100.

Management objectives for this population recognize the importance of this population expanding into neighboring areas to provide additional harvest opportunities. This population is likely responsible in part to the recent growth of adjacent populations, particularly in the north and west. With the already long and liberal resident season the department recommends the board consider additional nonresident opportunity.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-073)

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**PROPOSAL 14**

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

Establish fixed-season dates for resident registration moose hunts RM575 & RM576 in Unit 17A as follows:

Units and Bag Limits (15)	Resident	Nonresident Open Season
	Open Season (Subsistence and General Hunts)	
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 antlered bull by registration permit; [DURING THE PERIOD JAN.1–LAST DAY OF FEB. A SEASON UP TO 31 DAYS MAY BE ANNOUNCED BY EMERGENCY ORDER;] or	<b><u>Jan.1–Last day of Feb.</u></b> [WINTER SEASON TO BE ANNOUNCED BY BY EMERGENCY ORDER] (Subsistence hunt only)
1 antlerless bull by registration Permit; [DURING THE PERIOD DEC.1–LAST DAY OF FEB. A SEASON UP TO 31 DAYS MAY BE ANNOUNCED BY EMERGENCY ORDER;]	<b><u>Jan.1–Last day of Feb.</u></b> [WINTER SEASON TO BE ANNOUNCED BY BY EMERGENCY ORDER] (Subsistence hunt only)

NONRESIDENT HUNTERS:

No open season.

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 50 permits may be issued	Sept. 5—Sept. 15
...	

**What is the issue you would like the board to address and why?** The Unit 17A moose population is above population objective (N=2,370). Unit 17A provides quality moose habitat that supports a robust moose population. Based on this fact, the 2013 Moose Management group established a population objective of 800–1,200 moose to prevent the population from increasing to numbers above what the landscape can support. The Alaska Department of Fish and Game (ADF&G) relies on both.

Registration hunts RM575 and RM576 were created by the Board of Game in 2011 with the intent of targeting one antlerless bull and one antlered bull. These hunts are opened by emergency order (EO) each year and may only be extended up to 31 days by EO to target weather conditions suitable for travel. Since 2012 this hunt has been extended by EO every year except the 2015/2016 winter season because poor winter travelling conditions have prevented users from accessing moose in the first 31-day period. Given that the Unit 17A population continues to remain above objectives, ADF&G recommends continuing to administer these hunts by registration permit but with a set season of January 1 to the last day of February providing up to a 60-day season. The hunts will continue to be closed by EO when the established harvest quota is reached. This hunt structure

allows hunters the flexibility to engage in hunting activities as soon as conditions are appropriate, for longer periods and to facilitate our ability to bring this population within objectives.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-050)  
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## **PROPOSAL 15**

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

Establish a registration hunt for bull moose limited to resident certified bowhunters only within Unit 17B as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on September 16 and closing on September 25 or by emergency order. This hunt would be for residents only and subject to the same bag limit and reporting requirements as outlined for RM583. RM583 is an existing hunt that is open to any weapon for residents only from August 20 to September 15 in Units 17B and 17C.

This new registration hunt would be for the entirety of Unit 17B only.

The purpose of this new hunt being a registration hunt would be so that the Department of Fish and Game (ADF&G) can monitor the participation and success rates more closely.

The purpose of the season being September 16 to September 25 would be so not to conflict with already existing hunts in the unit while at the same time not extending beyond normal moose seasons in surrounding areas.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more resident hunters the opportunity to spend time in the field pursuing moose within Unit 17B without having a negative impact on the resource. According to ADF&G, 699 moose were harvested in Unit 17B from 2009 to 2018. According to the ADF&G Dillingham office, only 7 of the 699 moose harvested were reported taken with archery equipment. These reported harvests with bow and arrow account for 1% of all moose taken in Unit 17B over a 10-year period, showing an extremely low impact to moose populations. There is only one other registration hunt for moose in the entire state of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADF&G. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations. Having a registration hunt rather than extending the general season would allow ADF&G to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises. Lastly, having a season that does not extend beyond September 25 would mirror most other moose season end dates in the surrounding units. The ADF&G biologist responsible for this area believes that current moose populations in Unit 17B can sustain this proposed hunt given that it would be restricted to certified bowhunters only.

**PROPOSED BY:** Mike Harris (EG-F20-041)  
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## **PROPOSAL 16**

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

Establish a registration hunt for bull moose open to nonresident certified bowhunters only within Unit 17B, remainder as follows:

Institute a registration hunt open to nonresident certified bowhunters only with season dates starting on September 16 and closing on September 25 or by emergency order. Number of permits and harvest reporting requirements would be set by the Department of Fish and Game (ADF&G). This hunt for nonresidents would be subject to the of the same antler restrictions and hunter orientation requirements as outlined in all other Unit 17 nonresident hunts. Currently, all nonresident hunters in Unit 17 may only harvest bull moose with 50-inch antlers or antlers with four or more brow tines on at least one side. Nonresidents are also required to complete a nonresident orientation prior to hunting moose in Unit 17.

This new registration hunt would be for the entirety of Unit 17B, remainder only.

The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely.

The purpose of the season being September 16 to September 25 would be so not to conflict with already existing hunts in the Unit while at the same time not extending beyond normal moose seasons in surrounding areas.

Having an additional hunt open to nonresidents would bring in more revenue to the State of Alaska as well as to local communities.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 17B without having a negative impact on the resource. According to ADF&G, 699 moose were harvested in Unit 17B from 2009 to 2018. According to the ADF&G Dillingham office, only 7 of the 699 moose harvested were reported taken with archery equipment. These reported harvests with bow and arrow account for 1% of all moose taken in Unit 17B over a 10-year period, showing the extremely low impact to moose populations. There is only one other registration hunt for moose in the entire State of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADF&G. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations. Having a registration hunt rather than extending the general season would allow the department to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises. Having a season that does not extend beyond September 25 would mirror most other moose season end dates in the surrounding units. The ADF&G biologist responsible for this area believes that current moose populations in Unit 17B can sustain this proposed hunt given that it would be restricted to certified bowhunters only. Lastly, having an additional hunt open to nonresidents would give the opportunity for guides to sell additional hunts to certified bowhunters, therefore, bringing in more revenue to the State of Alaska as well as to local communities.

**PROPOSED BY:** Mike Harris

(EG-F20-042)

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## **PROPOSAL 17**

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

Establish a registration hunt for bull moose limited to certified bowhunters only within Unit 17B as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on September 16 and closing on September 25 or by emergency order. This hunt would be for residents and nonresidents. Residents would be subject to the same bag limit and reporting requirements as outlined for RM583. RM583 is an existing hunt that is open to any weapon for residents only from August 20 to September 15 in Units 17B and 17C.

Nonresidents would be subject to the same antler restrictions and hunter orientation requirements as outlined in all other Unit 17 nonresident hunts. Currently, all nonresident hunters in Unit 17 may only harvest bull moose with 50-inch antlers or antlers with four or more brow tines on at least one side. Nonresidents are also required to complete a nonresident orientation prior to hunting moose in Unit 17. Number of permits and would be set by the Department of Fish and Game (ADF&G).

Registration would be available online or in person at ADF&G offices.

This new registration hunt would be for the entirety of Unit 17B only.

The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely.

The purpose of the season being September 16 to September 25 would be so not to conflict with already existing hunts in the unit while at the same time not extending beyond normal moose seasons in surrounding areas.

Having an additional hunt open to nonresidents would bring in more revenue to the state of Alaska as well as to local communities.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 17B without having a negative impact on the resource. According to ADF&G, 699 moose were harvested in Unit 17B from 2009 to 2018. According to the ADF&G Dillingham office, only 7 of the 699 moose harvested were reported taken with archery equipment. These reported harvests with bow and arrow account for 1% of all moose taken in Unit 17B over a 10-year period, showing an extremely low impact to moose populations. There is only one other registration hunt for moose in the entire State of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADFG. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations. Having a registration hunt rather than extending the general season would allow the department to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises. Having a season that does not

extend beyond September 25 would mirror most other moose season end dates in the surrounding units. Lastly, having an additional hunt open to nonresidents would give the opportunity for guides to sell additional hunts to certified bowhunters, therefore, bringing in more revenue to the state of Alaska as well as to local communities.

**PROPOSED BY:** Alaskan Bowhunters Association

(EG-F20-055)

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## **PROPOSAL 18**

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

Extend the resident winter moose season in Units 17B and 17C as follows:

5 AAC 95.045. Hunting seasons and bag limits for moose. Add hunting season for moose in Units 17B and 17C as follows:

Unit 17B remainder: One antlered bull by permit available in person in Dillingham beginning October 25 and Nushagak River Villages.

RM585: December 1 – January 31 Nushagak River Drainage.

Unit 17C: One antlered bull by permit available in person in Dillingham beginning October 25 and Nushagak River villages.

RM585 December 1 - January 31 Nushagak River Drainage.

**What is the issue you would like the board to address and why?** Extend the resident open season for the winter moose hunt in the Nushagak River Drainage in Units 17B and 17C in order to increase hunter opportunity in the area. Alaska has warmed up about 2.5 degrees Fahrenheit compared to about 1.5 degrees Fahrenheit for the contiguous United States as a whole. Most of the warming has occurred in the winter and spring seasons (NOAA). Lack of snow and late freeze up of the Nushagak River conditions have limit hunting during the scheduled one-month open season in December. Only a few hunters participated in the hazardous conditions with a few moose harvested. Climate change has affected the warmer winter conditions in 2019 and will continue into the future. With lack of snow and dangerous ice conditions, hunters had little access to traditional hunting areas, and predators had also scattered game close to villages. The extended season will allow hunters to safely travel with sufficient snow cover and river freeze up.

**PROPOSED BY:** Moxie Andrew Jr.

(EG-F20-061)

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*Note: The range of the Mulchatna caribou herd is Units 9 and 17 in the Central & Southwest Region; Unit 18 for the Western Arctic/Western Region; and Unit 19 for the Interior and Eastern Arctic Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

## **PROPOSAL 19**

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

Establish new population and harvest objectives for the Mulchatna caribou herd in Units 9, 17, 18, and 19 as follows:

We 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 and additional analysis of causes of mortality including harvest.

<b>Population Caribou Herds</b>	<b>Finding</b>	<b>Population</b>	<b>Harvest</b>
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	<b><u>To be determined</u></b> [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		
Teshekpuk	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		
Wolf 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 13,500 in 2019. 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 2019 population estimate was 13,500, less than half of the minimum of the objective range.

The multiple revisions in objectives over time have been a sensible approach to management of a changing resource. We are requesting that the Board of Game review the Intensive Management population and harvest objectives with the goal of adjusting objectives to an ecologically sustainable level. We recommend this review include careful consideration of habitat quality, which almost certainly has changed in response to caribou grazing, reducing population potential.

**PROPOSED BY:** Togiak National Wildlife Refuge (HQ-F20-030)  
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*Note: The range of the Mulchatna caribou herd is Units 9 and 17 in the Central & Southwest Region; Unit 18 for the Western Arctic/Western Region; and Unit 19 for the Interior and Eastern Arctic Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

## **PROPOSAL 20**

**5 AAC 85.025 (3)(4)(12)(13)(14). Hunting seasons and bag limits for caribou.**

**5 AAC 92.062. Priority for subsistence hunting; Tier II permits.**

Establish Tier II subsistence hunting season and bag limit for the Mulchatna caribou herd (MCH) as follows:

The proposed structure would replace the existing RC503 permit across the entire range of the MCH with a Tier II subsistence hunting structure providing up to 5,000 permits, a bag limit of one caribou, and updated season dates in Units 9A, 18, 19A, and 19B from August 1 to September 30 and November 15 to March 15, providing a break during the rut. The season in Units 9B, 9C, and 17 would continue to extend until March 30. No nonresident opportunity would be provided.

**What is the issue you would like the board to address and why?** The current harvest strategy across the range of the Mulchatna caribou herd (MCH) is administered under registration caribou permit RC503 which allows up to two caribou. In Units 9A, 9C (within the Alagnak River drainage), 18, 19A and 19B, the season runs from August 1 to March 15. In Units 9B, 9C (the portion of north of the north bank of the Naknek River and south of the Alagnak River drainage) and 17, the season is 15 days longer, from August 1 to March 31.

Additional caribou seasons in these units are available for residents targeting the Northern Alaska and Southern Alaska Peninsula herds in Units 9C and 9E (TC505) and for residents and nonresidents in Unit 9D (harvest ticket). Registration permit RC501 provides resident opportunity on the Nushagak Peninsula caribou herd in portions of Units 17A and 17C. Both residents and nonresidents can also hunt caribou in Units 19C and 19D under a general season harvest ticket.

According to 5 AAC 92.062, when nonsubsistence uses of a game population have been eliminated and the taking of game must be further restricted to ensure that the population is maintained and managed on a sustained yield basis, or to ensure the continuation of subsistence uses of the population, hunting permits must be issued and allocated under the Tier II system. The MCH has been in decline since the late 1990s and has failed to stabilize. Over the course of the last 5–10 years, the MCH has not met intensive management goals or the amount reasonably necessary for subsistence, which is 2,100 to 2,400 caribou (ANS). There has been no nonresident harvest of this herd since the 2000s, and bag limits on this herd have consistently remained reduced for residents. The herd’s decline to an estimated 13,500 caribou in 2019 initiated another range-wide bag limit reduction followed by an early closure of the RC503 hunt.

In addition to establishing a Tier II harvest structure, we propose a) changing the hunt season to exclude harvest during the rut so that animals can breed without the additional pressure exerted on the herd by hunters, and b) standardizing the season across most of the MCH range to reduce hunter confusion and encourage reporting.

**PROPOSED BY:** The Alaska Department of Fish and Game (HQ-F20-060)  
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*Note: The range of the Mulchatna caribou herd is Units 9 and 17 in the Central & Southwest Region; Unit 18 for the Western Arctic/Western Region; and Unit 19 for the Interior and Eastern Arctic Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting.*

## **PROPOSAL 21**

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

Establish a second predation control area for Mulchatna caribou on federal lands in Game Management Units 17 and 18.

**What is the issue you would like the board to address and why?** The Mulchatna Caribou Herd Predation Management Area is established to increase the Mulchatna caribou herd (MCH) within Units 9B, 17B, 17C, 19A and 19B to aid in achieving intensive management (IM) objectives. The Mulchatna Caribou Herd Predation Management Area encompasses approximately 39,683 square miles (multiple predator control areas may be utilized within the management area); however, the current active control areas is limited to a total of 10,000 square miles, which is 25 percent of the management area.

The current control program was first established by the Board of Game (board) in 2011 for wolf control. It is designed to increase the caribou herd’s population size and human harvest by reducing wolf predation on caribou and is expected to contribute to achieving the IM objectives across the range. The IM objective for the MCH as established in 5 AAC 92.108 is 30,000–80,000 caribou. These objectives were based on historical information regarding population numbers, habitat limitations, human use, and sustainable harvests. The caribou harvest objective established for the MCH is 2,400–8,000.

Wolves are a major predator of caribou in the range of the MCH and are an important factor in failing to achieve objectives. The wolf population objective for the MCH Predation Management Area is to annually reduce the number of wolves in predator control areas to a level that results in increased calf survival and recruitment. A reduction of wolf predation can reasonably be expected to aid in achieving objectives using recognized, prudent active management techniques based on scientific information.

The population and harvest objectives for the MCH are still well below the IM objectives throughout the herd's range and state and federal hunts have been affected, resulting in bag limit changes and an early closure to the 2019/2020 season. It is still believed that reducing wolf predation is likely effective and that reducing wolf predation is in the best interests of subsistence users. Under 5 AAC 99.025, in 1988, the board made a positive customary and traditional use (C&T) finding for caribou in Units 9A, 9B, 17, and 18, with an amount reasonably necessary for subsistence (ANS) of 2,100– 2,400 caribou. To date, the program has been affected by the limitations of flying and tracking conditions and hampered to a degree by an inability to reduce predation on large portions of federal land where much of the MCH range. In winter 2020 the Secretary of the Interior communicated to the Commissioner of the Alaska Department of Fish and Game (department) that the Division of Wildlife Conservation should draft a plan for predation control on federal lands in Units 17 and 18 to address the declining caribou population. This proposal seeks to establish additional predation control area(s) by expanding the current authorized limit of 10,000 mi<sup>2</sup> for implementation on federal lands (Togiak National Wildlife Refuge).

This proposal requires concurrence from the Department of Interior for implementation on federal lands. The department anticipates this approval prior to the Board of Game meeting in January 2021.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-052)  
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## **PROPOSAL 22**

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

Determine customary and traditional uses of the Nushagak Peninsula caribou herd in Game Management Units 17A and 17C – Nushagak Peninsula, Bristol Bay.

**What is the issue you would like the board to address and why?** Under AS 16.05.258, the Board of Game (board) is required to identify game populations, or portions of populations, that are customarily and traditionally taken or used for subsistence. Under 5 AAC 99.025, in 1988, the board made a positive customary and traditional use (C&T) finding for caribou in Units 9A, 9B, 17, and 18, with an amount reasonably necessary for subsistence (ANS) of 2,100– 2,400 caribou. Generally, the Board of Game makes C&T findings for specific caribou herds. In early 1988, most caribou taken in Unit 17 were from the Mulchatna caribou herd (MCH). Therefore, the information provided to the board in support of the positive C&T determination generally addressed uses specific to the MCH. Since 1988, however, two distinct caribou populations have been present in Unit 17: the MCH and the Nushagak Peninsula caribou herd (NPCH). A customary and traditional

use finding specific to the NPCH herd has not been made. The department is proposing the board make a C&T determination specifically for the NPCH.

Following the C&T determination for caribou in Unit 17, caribou were reintroduced to the Nushagak Peninsula to provide additional caribou hunting opportunities. The NPCH primarily occupies the approximately 425 square mile Nushagak Peninsula, which is the portion of Units 17A and 17C south of the Igushik River, the Tuklung River, and the Tuklung Hills, and west to Tvativak Bay. Prior to 2016, caribou hunting on the Nushagak Peninsula was limited to federally-qualified subsistence users under permit FC1702. In 2016, an area within the Nushagak Peninsula was opened to hunters using the state RC501 permit to increase harvest and lower the population of the Nushagak Peninsula herd, which had exceeded population objectives. With a reported harvest of 378 caribou during the 2016–2017 season, and 100 caribou during the 2017–2018 season, the population estimate declined from 1,294 in 2016 to 822 in 2019. The NPCH is now closer to the optimum level of 750.

The Department of Fish and Game (department) will prepare a report with information relevant to the eight criteria (5 AAC 99.010) that the board uses to identify game populations with customary and traditional uses, to assist the board with this finding.

If the board chooses to make a positive C&T finding for the Nushagak Peninsula caribou herd, the department will also provide options for the board to consider establishing an ANS.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-034)  
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## **PROPOSAL 23**

### **5 AAC 92.080(4)(B)(vii). Unlawful methods of taking game; exceptions.**

Allow the use of snowmachine to position wolf or wolverine for harvest in Unit 17 as follows:

On page 18 of the hunting regulations book, it would read: “A snowmachine may be used to position a wolf or wolverine for harvest, and a wolf or wolverine may be shot from a stationary snowmachine in Units 17, 18, 22, 23, and 26A.”

In 5AAC 92.080(4)(B)(vii) it would read “in Units 17 and 18, a snowmachine may be used to position a wolf or wolverine for harvest, and wolves or wolverines may be shot from a stationary snowmachine;”

**What is the issue you would like the board to address and why?** Currently, the restrictions against driving, herding, harassing, or molesting game, in the accepted allowance for the use of snowmachines to position hunters to select individual wolves, and the absence of wolverines in the accepted allowance for snow machine positioning, conflicts with the long standing local, wolf and wolverine hunting practices which is the only practical way to hunt wolves, and wolverines in Unit 17 during the winter. Also, the allowance for snowmachine use to position a hunter does not satisfactorily address this issue, as it does not clarify whether this includes actually tracking down wolves, or wolverine, including pursuing animals, until close enough to shoot. This proposal

simply seeks to provide Unit 17 hunters and trappers the same opportunities currently available in Units 18, 22, 23, and 26A.

If the Board of Game does not change the regulation, local people hunting these species with snowmachines will continue to live with the threat of prosecution for hunting with snowmachines in the only way practical, making people feel like criminals and interfering with the ability to freely pursue these animals for critical and irreplaceable fur products and income. These animals are critical to the local economy and way of life and enforcement of current regulations is viewed as insensitive to the culture, economy and food security in the region.

Allowing a hunter to use a snowmachine to get within range of fleeing wolves, and wolverines will allow the precise shot placement which will minimize unnecessary waste of fur and is the most humane method of killing an animal with a rifle. Wildlife enforcement officers will also have a clear understanding of the intent to allow for the pursuit of these species, reducing unnecessary conflicts and increasing the cooperation of the people on the other enforcement issues where local cooperation is necessary to the mission to protect all species in the areas.

The local people will appreciate the Board of Game and the Department of Fish and Game being responsive to the needs of the people and by correcting this issue will put integrity back in the system by getting rid of a longstanding conflict between regulatory prohibitions and common local practices that are the only practical way to pursue these species in the winter. In addition, the future cooperative management strategies and goals will be more likely to succeed as the people will have increased faith that the system takes their needs into account and is responsive to them.

**PROPOSED BY:** Nushagak Fish and Game Advisory Committee (HQ-F20-031)  
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## **PROPOSAL 24**

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

**5 AAC 92.220. Salvage of game meat, furs, and hides.**

Establish a season, daily and seasonal bag limit, and salvage requirement for Alaska hare in Unit 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 1–5	Sept. 1 – Apr. 30	Sept. 1 – Apr. 30
Units 6–26, except	No closed season	No closed season

14(A) and 14(C) and  
Alaska hares in Units 9,  
**17**, 18, 22, and 23  
No limit

Unit 9 and **17**,  
Alaska hares only  
1 per day, 4 total

Nov. 1 – Jan. 30

Nov. 1 – Jan. 30

Unit 18, 22, and 23, Alaska hares only  
2 per day, 6 total

Unit 14(A)  
5 per day

No closed season  
(General hunt only)

No closed season

Unit 14(C)  
5 per day

Day after Labor Day–  
April. 30  
(General hunt only)

Day after Labor Day–  
Apr. 30

## 5 AAC 92.220. Salvage of game meat, furs, and hides.

(a) Subject to additional requirements in 5 AAC 84-5AAC 85, a person taking game shall salvage the following parts for human use:

...

(7) the hide or meat of Alaska hares taken in Units 9, **17**, 18, 22, and 23;

**What is the issue you would like the board to address and why?** Currently there are season dates, daily and annual bag limit, and salvage requirement for Alaska hare throughout the species range in Alaska (Units 9, 18, 22, and 23) except Unit 17. Given the ongoing research, continued low abundance, and public concern about this species it is important to consider a cohesive and comprehensive management framework for this species across the entire range within Alaska. Many rural residents have reported seeing far fewer Alaska hares in the past 1-2 decades throughout their local areas, and reconnaissance of Alaska hares by ADF&G staff in Unit 17 have yielded few observations. The Board of Game has made positive customary and traditional use findings for Alaska hares throughout their range in Alaska.

The current Alaska hare salvage requirement is described as human use. We recommend this categorization also be used in Unit 17. The human use requirement would be met as long as some portion of the carcass is used for human consumption, trapping, sewing, dog training, dog food, etc. This proposal would simply prohibit the harvest of an Alaska hare with no attempt to recover, eat, or in any way attempt to use part or all of the carcass. Trappers would be allowed to use a whole or portion of a carcass for trapping bait.

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

(HQ-F20-037)

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## King Salmon Area Proposals – Units 9 & 10

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### PROPOSAL 25

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

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

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

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

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

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

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

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

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

Population Objectives

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

Harvest Objectives

- Annual Harvest: 20–150

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

(HQ-F20-048)

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## **PROPOSAL 26**

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

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

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

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

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

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

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

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## **PROPOSAL 27**

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

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

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

...

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

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

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

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

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

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

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

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

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

- (A) The board has designated the NAP as important for providing high levels of human consumptive use;**
- (B) the board established objectives for population size and annual sustained harvest of caribou in Units 9(C) and 9(E) consistent with multiple use and principles of sound conservation and management of habitat and all wildlife species in the area;**
- (C) the population and harvest for the NAP are below IM objectives throughout the range;**
- (D) wolves are a major predator of caribou in the range of the NAP and are an important factor in failing to achieve these objectives;**
- (E) a reduction of predation can reasonably be expected to aid in achieving the objectives;**
- (F) nutrition is not considered to be the primary factor limiting caribou population growth;**
- (G) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;**
- (H) reducing predation is likely to be effective given land ownership patterns, and;**
- (I) reducing predation is in the best interests of subsistence users.**

**(4) Authorized methods and means are as follows:**

- A) hunting and trapping of wolves by the public in treatment areas during the term of the management program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles as provided in 5 AAC 92.080;**
- (B) the commissioner may issue public aerial shooting permits, public land and shoot permits, or ground-based shooting permits, allow agents of the state, or department employees to conduct aerial, land and shoot, or ground-based shooting as a method of wolf removal under AS 16.05.783, including the use of any type of aircraft;**
- (C) the commissioner may authorize the use of state employees or agents or state owned, privately owned, or chartered equipment, including helicopters, as a method of wolf removal under AS 16.05.783;**

**(5) Time frame is as follows:**

**(A) through June 30, 2031, the commissioner may authorize the removal of wolves in the NAP Predation Management Area;**

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

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

**(A) when the IM population and harvest objectives for the NAP are sustained or the population can grow at a sustained rate of five percent annually;**

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

**(C) if after three years, there is no detectable increase in the total number of caribou in the control area;**

**(D) if after three years, bull-to-cow ratios show no appreciable increase or remain below 20 bulls per 100 cows;**

**(E) if after three years, fall calf-to-cow ratios show no appreciable increase or can be sustained at 25 or more calves per 100 cows;**

**(F) if after three years, any measure consistent with significant levels of nutritional stress in the caribou population are identified;**

**(G) when the caribou population and harvest objectives within the NAP Predation Management Area have been met; or**

**(H) upon expiration of the period during which the commissioner is authorized to reduce wolf numbers in the wolf reduction areas.**

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

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

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

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

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## **PROPOSAL 28**

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

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

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

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

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

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

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

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## **PROPOSAL 29**

### **5 AAC 84.270 Furbearer trapping.**

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

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

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

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

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

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

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

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

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

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

**PROPOSED BY:** Dan Montgomery

(EG-F20-046)

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### **PROPOSAL 30**

#### **5 AAC 84.270. Furbearer trapping.**

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

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

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

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

**PROPOSED BY:** Jeff Lucas

(EG-F20-082)

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## **PROPOSAL 31**

### **5 AAC 84.270. Furbearer trapping.**

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

Close wolverine trapping and hunting in Unit 10 as follows:

### **5 AAC 84.270. Furbearer trapping.**

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

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

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

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

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

(HQ-F20-071)

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## **PROPOSAL 32**

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

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

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

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

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

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

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

## **PROPOSAL 33**

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

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

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

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

Proposed breakdown of available permits:

Regular season:

AK Residents: 500 permits // nonresidents: 500 permits

Restrictive season:

AK Residents: 250 permits // nonresidents: 250 permits

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

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

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

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

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

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

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

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

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

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

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

## **PROPOSAL 34**

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

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

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

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

#### **Proposed breakdown of available permits:**

##### **Regular season:**

AK Residents: 500 permits // nonresidents: 500 permits

Restrictive season:

AK Residents: 250 permits // nonresidents: 250 permits

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

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

The State of Alaska Department of Fish and Game and the Alaska Board of Game established a resident sport hunting season for fall/winter 2017 with seven zones, each zone having its own quota. The total of these zones equaled the 1,000 bird quota under regular USFWS harvest quotas based off of the population index. The total quota would be reduced to 500 if the previous year's population index fell within the moderate harvest prescription. A game management unit (GMU) will close after shooting hours on the last day of the season, or by Emergency Order when the GMU quota is met. The Emperor goose hunt was set up as a registration hunt and the limit has been one bird per person per season for the entire state. Also established in 2017 was an application for nonresidents to apply for a drawing to hunt Emperors during the fall/winter 2018 season. In 2017, all of the 1,000 bird quota was allotted to Alaska residents; for fall/winter 2018 and 2019 seasons, the number allotted to nonresidents was 25 of the total 1,000 quota.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **PROPOSAL 35**

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

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

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

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

#### **Proposed breakdown of available permits:**

##### **Regular season:**

AK Residents: 500 permits // nonresidents: 500 permits

##### **Restrictive season:**

AK Residents: 250 permits // nonresidents: 250 permits

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

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

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

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

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

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

### **PROPOSAL 36**

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

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

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

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

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

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

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

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

### **PROPOSAL 37**

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

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

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

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

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

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

**PROPOSAL 38**

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

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

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

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

**PROPOSED BY:** Britt Broadhurst

(EG-F20-081)

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

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

**PROPOSED BY:** Christopher Eikelberger

(EG-F20-116)

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

**PROPOSAL 39**

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

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

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

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

**PROPOSED BY:** Josh Sowada

(EG-F20-107)

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

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

**PROPOSED BY:** Brett McCausland

(EG-F20-090)

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

**PROPOSAL 40**

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

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

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

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

**PROPOSED BY:** Sherwin Lott (EG-F20-065)  
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*Note: Emperor geese harvest regulations apply to Units 9, 10 and 17 for the Central/Southwest Region; 18, 22 and 23 for the Western Arctic/Western Region; and Unit 8 for the Southcentral Region. The Board of Game is scheduled to address only the Central/Southwest Region units at this meeting. Proposal 41 is a combination of twelve individual submissions requesting an increase in nonresident permits for taking Emperor geese.*

**PROPOSAL 41**

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

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

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

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

**PROPOSED BY:** Christopher O'Brien (EG-F20-070)  
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My solution would be to increase tag numbers.

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

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

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

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

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

**PROPOSED BY:** Lucien Gwin (EG-F20-083)  
~~~~~

Increase availability to hunt Emperor geese for nonresidents.

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

**PROPOSED BY:** Kevin Ryan (EG-F20-088)  
~~~~~

More tags for nonresidents due to increase demand and populations of the Emperor geese available for harvest. There is no evidence to prove overharvest in hunting or subsistence at this point in time.

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

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

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

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

**PROPOSED BY:** Lee Thomas Kjos

(EG-F20-102)

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

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

**PROPOSED BY:** Scott Haugen

(EG-F20-136)

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

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

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

**PROPOSED BY:** Jason Pinter

(EG-F20-143)

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

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

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

**PROPOSED BY:** Delbert. Gatlin IV

(EG-F20-149)

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

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

**PROPOSED BY:** Steven Sadowski

(EG-F20-163)

~~~~~

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

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

**PROPOSED BY:** Matt Frackelton

(EG-F20-084)

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

## **PROPOSAL 42**

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

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

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

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

**PROPOSED BY:** Moe Neale

(EG-F20-085)

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

## **PROPOSAL 43**

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

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

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

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

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

**PROPOSED BY:** Matthew Wilson

(EG-F20-130)

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

#### **PROPOSAL 44**

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

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

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

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

**PROPOSED BY:** Michael Bard

(EG-F20-159)

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

#### **PROPOSAL 45**

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

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

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

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

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

**PROPOSED BY:** Gina Sadowski

(EG-F20-166)

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

#### **PROPOSAL 46**

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

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

Preference points and increase nonresident tags.

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

**PROPOSED BY:** Thomas Losk

(EG-F20-168)

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

#### **PROPOSAL 47**

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

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

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

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

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

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

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

#### **PROPOSAL 48**

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

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

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

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

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

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

#### **PROPOSAL 49**

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

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

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

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

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

**PROPOSED BY:** Shane Smith

(EG-F20-087)

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

## **PROPOSAL 50**

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

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

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

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

1st timer up to two tags at 100%

2nd timer up to 1 tag at 100%

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

500 harvests to nonresidents

500 harvests to 1st timers

200 harvests to 2nd timers

125 harvests to 3rd timers

1325 total harvests

Emperor goose population density 175,000

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

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

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

**PROPOSED BY:** Christian Scudder

(EG-F20-089)

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

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### **PROPOSAL 51**

#### **5 AAC 85.010. Hunting seasons and bag limits for bison.**

Expand the DI454 bison hunt area in Unit 11 as follows:

I would suggest amending the description of the hunt area.

East of the Copper River, south of the Klawasi River and west of a line from Mount Sanford to **Mount Blackburn to Kuskulana Glacier, west of the Kuskulana River and north of the Chitina River** [MOUNT WRANGELL TO LONG GLACIER, WEST OF THE KOTSINA RIVER]

**What is the issue you would like the board to address and why?** I propose extending the DI454 bison hunt area south beyond the Kotsina River to the Chitina River.

In the last ten years, bison from the Copper River herd have been extending their range south and eastward across the Kotsina River to the Chitina River and at times becoming a nuisance to vehicles traveling on the McCarthy Road. Extending the hunt area would allow motor vehicle access to a portion of the Copper River herd giving more hunting opportunities to people without the equipment or knowledge to safely cross the Copper River.

When the current description of the hunt area was originally written it was not generally believed that the herd would travel South beyond the Kotsina River. Now that bison frequently cross the Kotsina River it makes sense to amend the description of the hunt area to include that area which lies between the Kotsina and Chitina Rivers.

**PROPOSED BY:** Tim Nelson

(EG-F20-004)

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### **PROPOSAL 52**

#### **5 AAC 85.025(a)(8). Hunting seasons and bag limits for caribou.**

Repeal the “pre-2018” caribou hunting regulations for Unit 13 as follows:

Repeal the following language from 5 AAC 85.025(a)(8):

[(A) BEFORE JULY 1, 2018, THE HUNTING SEASONS AND BAG LIMITS FOR CARIBOU IN UNIT 13 ARE AS FOLLOWS:

UNIT 13

1 CARIBOU PER HARVEST REPORT PER REGULATORY YEAR BY COMMUNITY HARVEST PERMIT ONLY; UP TO 300 CARIBOU MAY BE TAKEN AUG.10-SEPT.20 (SUBSISTENCE HUNT ONLY) OCT.21-MARCH 31 (SUBSISTENCE HUNT ONLY); OR

1 CARIBOU EVERY REGULATORY YEAR BY TIER 1 SUBSISTENCE PERMIT ONLY  
AUG.10-SEPT.20 (SUBSISTENCE HUNT ONLY) OCT.21-MARCH 31 (SUBSISTENCE  
HUNT ONLY); OR

1 CARIBOU EVERY REGULATORY YEAR BY DRAWING PERMIT; UP TO 5,000  
PERMITS MAY BE ISSUED AUG.10-SEPT.20 OCT.21-MARCH 31.

UNITS 14(A) AND 14(B)  
RESIDENTS

1 CARIBOU BY DRAWING PERMIT ONLY; AUG.10-SEPT.20 (WINTER SEASON TO BE  
ANNOUNCED)(GENERAL HUNT ONLY)

NONRESIDENTS

1 CARIBOU BY DRAWING PERMIT ONLY; AUG.10-SEPT.20 (WINTER SEASON TO BE  
ANNOUNCED).

(B) ON OR AFTER JULY 1, 2018, THE HUNTING SEASONS AND BAG LIMITS FOR  
CARIBOU IN UNIT 13 ARE AS FOLLOWS:]

**What is the issue you would like the board to address and why?** Repeal pre-2018 regulations and return Unit 13 caribou hunting regulations to conventional style. It is our understanding that this approach to pre-July 1, 2018 regulations and post-July 1, 2018 regulations resulted from the fact that drawing permits had already been issued. The need for the pre-July 1, 2018 regulations has passed. (Housekeeping proposal.)

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

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### **PROPOSAL 53**

#### **5 AAC 85.025(a)(8). Hunting seasons and bag limits for caribou.**

Increase the community subsistence caribou hunt allocation in Unit 13 as follows:

Amend 5 AAC 85.025(a)(8) as follows:

up to 2 caribou per harvest report per regulatory year by community harvest permit only; up to  
[400] **500** caribou may be taken; or

**What is the issue you would like the board to address and why?** Increase the community subsistence caribou hunt allocation from up to 400 caribou may be taken to up to 500 caribou may be taken.

This change is requested in order to address the fact that addition caribou are needed in the community subsistence caribou hunt to provide for customary and traditional harvest and uses of caribou by Alaska residents living in Unit 13.

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

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## **PROPOSAL 54**

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

Increase the youth hunting season for caribou in Unit 13 as follows:

Increase the hunting season for Nelchina caribou (YC495) in Unit 13 as follows:

One caribou every regulatory year by youth hunt drawing permit; up to 200 permits may be issued. August 1 - August 9 [5] and **October 21 - March 31**. Nonresidents: No open season.

**What is the issue you would like the board to address and why?** Currently, the season dates for Unit 13 Nelchina caribou under permit YC495 are August 1 – August 5. The five-day window is rather short. Additionally, CC001, DC485, RC561, and RC562 are open October 21 – March 31 after their first openings, if quotas are not met. Allowing participants in YC495 to participate from August 1 – August 9 and participate in the October 21- March 31 achieves the following:

- Allow for more opportunities for youth hunting participation.
  - Increasing the number of days to August 9 allows for a great window of opportunity for harvest. Herd locations in early August are scattered compared to mid to late September. Depending on year, it may take multiple days to scout an area as there have been no caribou hunters in the field.
  - If the current dates fall within the work week (such as August 1st being a Monday), it does not provide families opportunities to hunt on the weekend. Changing the end of the youth first season to August 9 would guarantee at least one full weekend to allow families to hunt and not take off any time from work.
  - The winter period provides dates such as Thanksgiving break, Winter break, and Spring break for students to hunt and not be taken away from academic commitments and provides greater flexibility for families to plan appropriately.
- Streamline dates for all draw and Tier I permits to have the same second season.
- Increases the amount of harvested caribou to help with desired population management. As stated on the Unit 13 Nelchina Caribou Hotline (at time of writing this), it does not appear that the 2019/2020 harvest quotas will be reached. I know a few families that would have liked to have their youth participate in the winter hunt and it would help with population management.

**PROPOSED BY:** Tyler Eggen

(HQ-F20-002)

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## **PROPOSAL 55**

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

Open a registration goat hunt for residents in Unit 13 as follows:

Create a goat registration hunt for Unit 13A from **August 10th to November 15th** [NO OPEN SEASON].

Harvest limit: (1) billy or nanny without kids.

**What is the issue you would like the board to address and why?** Create a goat registration hunt for Unit 13A from August 10th to November 15th .

Goats cross the Matanuska River from the Chugach Range on an abnormal and inconsistent basis. For this reason, they are not able to successfully create any legitimate herds that could be considered a natural range. There have been populations that have succeeded in establishing themselves in the past but have not been able to maintain any natural consistency.

With this, I feel it would be appropriate to offer a registration hunt for billies and nannies without kids. It is known that goats and sheep do not naturally co-habitat well together, therefore it would seem reasonable to harvest these particular goats that do not have a natural range or herd.

**PROPOSED BY:** Herb Mansavage

(HQ-F20-016)

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## **PROPOSAL 56**

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

Extend the general season for moose by bow and arrow only for residents and nonresidents within Unit 11, remainder as follows:

Extend the general season from September 20 to September 25 by bow and arrow only. This hunt would be subject to the same residency requirements, area, and antler restrictions as outlined in the existing Unit 11 general season hunt. Hunters during the general season in Unit 11 currently may only harvest bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side. The purpose of extending the general season by bow and arrow only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 11 without having a negative impact on the resource.

**What is the issue you would like the board to address and why?** Extending the general season by bow and arrow only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 11 without having a negative impact on the resource. According to the Alaska Department of Fish and Game (ADF&G), from 2014 to 2018, only 1% of moose harvested in Unit 11 were taken with a bow. These reported archery harvests show the extremely low impact to moose populations. Lastly, having a season that does not extend beyond September 25 would mirror most other moose season end dates in the surrounding units.

**PROPOSED BY:** Gary Weaver

(EG-F20-049)

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## **PROPOSAL 57**

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

Establish a registration hunt for bull moose open to certified bowhunters only within Unit 11, remainder as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on September 21 and closing on September 30 or by emergency order. Number of permits and harvest reporting requirements would be set by the Department of Fish and Game. This hunt would be subject to the same residency requirements, area, and antler restrictions as outlined in the existing Unit 11 general season hunt. Hunters during the general season in Unit 11 currently may only harvest bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side.

Registration would be available online or in person at ADF&G offices.

The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely.

Having an additional hunt open to non-residents would bring in more revenue to the state of Alaska as well as to local communities.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more hunters the opportunity to spend time in the field pursuing moose within Unit 11 without having a negative impact on the resource. According to the Alaska Department of Fish and Game (ADF&G), from 2014 to 2018, only 1% of moose harvested in Unit 11 were taken with a bow. These reported archery harvests show the extremely low impact to moose populations. Lastly, having an additional hunt open to non-residents would give the opportunity for guides to sell additional hunts to certified bowhunters, therefore, bringing in more revenue to the State of Alaska as well as to local communities.

**PROPOSED BY:** Alaskan Bowhunters Association

(EG-F20-062)

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## **PROPOSAL 58**

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

Reauthorize the antlerless moose seasons in Unit 13 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(11)

Unit 13

1 moose per regulatory year,  
only as follows:

#### **RESIDENT HUNTERS:**

...

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

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

...

**What is the issue you would like the board to address and why?** Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within objectives.

This Unit 13 antlerless hunt was initially adopted in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. The hunt was modified when the board adopted an October and March season during the February 2013 board meeting.

Since the establishment of this hunt, the Department of Fish and Game (ADF&G) has issued 10 permits annually in Unit 13A. ADF&G intentionally limited the number of permits issued annually to gain public support for the hunt, even though a higher rate of cow harvest was desirable to regulate the moose population within objectives. After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed ADF&G to issue a sufficient number of permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit.

Moose have generally increased at an average rate of 2% per year in the intensive wolf management area over the past 10 years. The current population objective for Unit 13A is 3,500–4,200, and the population was estimated to be above objectives in 2015–2016 and within objectives

in 2017. The antlerless hunt in western Unit 13A is necessary to maintain the population within the intensive management objectives. The additional harvest provided by the hunt will also assist in achieving the harvest objectives for the population. If antlerless moose hunting opportunities are not reauthorized in Unit 13, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and achieves the harvest objectives recommended by the public, advisory committees, and the board.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-41)  
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### **PROPOSAL 59**

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

Increase the community subsistence any bull moose hunt allocation in Unit 13 as follows:

Amend 5 AAC 85.045(a)(11) as follows:

1 moose per regulatory year, only as follows:

#### **RESIDENT HUNTERS:**

1 bull per harvest report by community harvest permit only; however, no more than **150** [100] bulls that do not meet antler restrictions for other resident hunts in the same area may be taken by Tier II permit in the entire community harvest area during the August 20 - September 20 season, up to 350 Tier II permits may be issued; or

**What is the issue you would like the board to address and why?** Increase community subsistence any bull moose hunt allocation from no more than 100 bulls that do not meet antler restrictions to 150 any bull moose.

This change is requested in order to address the fact that additional moose are needed in the community subsistence any bull moose hunt to provide for customary and traditional harvest and uses of moose by Alaska residents living in Unit 13.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-024)  
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### **PROPOSAL 60**

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

Create a registration archery only hunt for bull moose in Unit 13 as follows:

Establish a registration archery only hunt for bull moose in Unit 13, that has requirements to commit to that specific hunt as the only moose hunt the hunter will participate in Alaska for that regulatory year; effectively redistributing those hunters to a specific time period not in competition with other moose hunters.

It is understood that the area biologist has concerns that adding this hunt may increase overall harvest of moose in the unit, which may impact bull cow ratios below what they would like to see.

In recognition of this and in an effort to minimize this potential; require commitment to this as the only specific moose hunt the hunter will participate in by making it a registration hunt that has tags only available prior to other moose seasons opening, placing the hunt five days after the regular general season in the unit closes will provide opportunity for some of the in season harvest reporting to be monitored and allowing emergency order restrictions reducing the hunt area as needed. It is unlikely that there will be a large influx of additional hunters that do not typically already hunt Unit 13 with the requirement that this is the only moose hunt they participate in. Additionally as you know typical archery hunt success is typically 10-20% of rifle hunter success.

By making it a registration hunt it provides the necessary controls for effective enforcement of the requirements of the hunt and allows the ability to more closely monitor participation and success rates. In exchange for the hunter commitment to the specific hunt with more primitive equipment that reduces success rate, they get a minor adjustment to the legal animal from the general season requirements.

Proposed draft regulatory language:

### **Hunt Details**

Hunt Number: RM XXX

Regulatory Year: 202X

Hunt Type: Registration

Species: Moose

Legal Animal: One (1) bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side.

Season Dates: 09/25/202X – 10/15/202X

Residency Restrictions: Resident only

Reporting Requirements:

Successful Hunters report within five days of kill online, or in person to ADF&G.

Unsuccessful Hunters report online, by mail, or in person to ADF&G within 15 days of season end.

### **Hunting Conditions:**

1) Permit: The RMXXX permit shall be in the possession of the permittee while hunting or transporting moose and shall be exhibited to any person authorized to enforce state and federal laws who requests to see it. The permit is NONTRANSFERABLE and cannot be proxy hunted.

Those who register for this hunt cannot obtain any other moose hunting authorization in Alaska, i.e. permit, harvest ticket, subsistence, community, etc. and cannot hunt moose anywhere else in Alaska during the regulatory year the permit is valid.

Permits available from ADF&G from July 1 to August 15.

2) Season: September 25 – October 15

3) Where: Unit 13

4) Bag Limit: One (1) bull moose with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side, by bow and arrow only.

5) Method: Bow and arrow only. Bowhunter certification is required.

6) Penalty for Failure to Report: If you fail to report, you will not be eligible for any drawing, Tier II, or registration (including Tier I Nelchina caribou) permits the following regulatory year. In addition your name will be turned over to the Alaska Wildlife Troopers for enforcement action.

**What is the issue you would like the board to address and why?** Provide a specific bowhunting season in Unit 13 to distribute hunters across a greater length of time to reduce crowding and competition.

**PROPOSED BY:** John Linnell

(EG-F20-038)

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## **PROPOSAL 61**

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

Establish a drawing permit hunt for bull moose limited to resident certified bowhunters only within Unit 13E as follows:

Institute a drawing permit hunt open to resident certified bowhunters only with the number of permits to be set by the Department of Fish and Game (ADF&G). This hunt would have the same season dates, area, and reporting requirements as DM339. This hunt would be for residents only and open to the take of any bull.

The purpose of this new hunt being a drawing permit hunt would be so that the ADF&G can monitor the participation and success rates more closely as well as determine the number of permits issued.

**What is the issue you would like the board to address and why?** A drawing permit hunt for certified bowhunters only would give more resident hunters the opportunity to spend time in the field pursuing moose within Unit 13 E without having a big impact on the resource. According to ADF&G, less than 1% of moose harvested in Unit 13 were taken with a bow from 2014 to 2018. These reported archery harvests show the extremely low impact to moose populations. According to the area biologist, Unit 13 moose populations are steady with Unit 13E being above objectives. Having a drawing permit hunt would allow ADF&G to collect data, closely monitor success rates, as well as determine the number of permits issued. Unit 13E currently has a drawing permit hunt open to nonresidents but no drawing permit hunts open to residents.

**PROPOSED BY:** Gary Weaver

(EG-F20-050)

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## **PROPOSAL 62**

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

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

#### **5AAC 85.045(a)(11)**

##### **Units and Bag Limits**

(11)

Unit 13

1 moose per regulatory year,  
only as follows:

...

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

...

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

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

##### **Nonresident Open Season**

**No open season**

**What is the issue you would like the board to address and why?** An Intensive Management plan for moose in Unit 13 is in effect, and antlerless moose hunts are a management tool that provides additional harvest opportunity when moose populations rise above objectives, and also gives the Department of Fish and Game the ability to maintain moose abundance within population objectives.

There has been an antlerless hunt in Unit 13A since 2012, but currently there are no other antlerless hunts in Unit 13.

Moose abundance in Unit 13E has increased from an index of less than 4,000 moose in 2000 to 6,400 moose in 2018 and 2019. The current population objective for Unit 13E is an index of 5,000–6,000 moose. The harvest objective for Unit 13E is 300–600 moose. Moose harvest over the past five years averages 200 moose annually, which represents the highest harvest numbers since 1998. Recent composition surveys indicate that the bull-to-cow ratio is approximately 25 bulls per 100 cows, which is the management objective for Unit 13E, indicating that there are not additional bulls available for harvest under the current Intensive Management program. An antlerless hunt in Unit 13E will allow the department to maintain the moose population within abundance objectives and composition objectives while providing additional harvest opportunity.

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

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

(HQ-F20-039)

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## **PROPOSAL 63**

### **5 AAC 92.050. Required permit hunt conditions and procedures.**

### **5 AAC 92.072. Community subsistence harvest hunt and permit conditions.**

Eliminate the restrictions of one harvest report per household and one bag limit per household in the community subsistence caribou hunt for Unit 13 as follows:

#### **Amend 5 AAC 92.050(a)(4)(I) as follows:**

No more than one Unit 13 Tier I subsistence permit for caribou may be issued per household every regulatory year, **except as otherwise specified for community subsistence hunt harvest reports in 5 AAC 92.072(c)(2) and (d);** the head of household, as defined in 5 AAC 92.071(b), and any member of the household obtaining a Unit 13 Tier I subsistence permit **or community subsistence hunt harvest report** in a regulatory year for caribou may not hunt caribou or moose in any other location in the state during that regulatory year; a community subsistence harvest report may be issued to all participating members of a participating household with the total bag limit for a household equal to the sum of the individual participants' bag limits as defined in 5 AAC 85.025(a)(8); [UP TO TWO CARIBOU MAY BE RETAINED PER HOUSEHOLD;]

#### **Amend 5 AAC 92.072(c)(2)(A) as follows:**

may not hold a harvest ticket or other state hunt permit for the same species where the bag limit is the same or for fewer animals during the same regulatory year; however, a person may hold harvest tickets or permits for same-species hunts in areas with a larger bag limit following the close of the season for the community harvest permit, except that in Unit 13, [PRIOR TO JULY 1, 2018, ONLY ONE CARIBOU MAY BE RETAINED PER HOUSEHOLD, AND ON OR AFTER JULY 1, 2018,] **a community subsistence harvest report may be issued to all participating members of a participating household with the total bag limit for a household equal to the sum of the individual participants' bag limits as defined in 5 AAC 85.025(a)(8);** [UP TO TWO CARIBOU MAY BE RETAINED PER HOUSEHOLD;]

#### **Amend 5 AAC 92.072(d) as follows:**

Seasons for community harvest permits will be the same as those established for other subsistence harvests for that species in the geographic area included in a community harvest hunt area, unless separate community harvest hunt seasons are established. The total bag limit for a community harvest permit will be equal to the sum of the individual participants' bag limits[, ESTABLISHED FOR OTHER SUBSISTENCE HARVESTS FOR THAT SPECIES IN THE HUNT AREA OR OTHERWISE BY THE BOARD]. Seasons and bag limits may vary within a hunt area according to established subsistence regulations for different game management units or other geographic delineations in a hunt area, **or as otherwise established by the board. In Unit 13, the total community subsistence caribou bag limit shall be equal to the sum of the individual participants' bag limits from all households participating in the community subsistence caribou hunt harvest report as determined by the board.**

**What is the issue you would like the board to address and why?** Eliminate the restriction of one harvest report per household and one bag limit per household in the community subsistence

caribou hunt in Unit 13 (CC001). Allow all members of a household participating in the community subsistence caribou hunt to each to obtain a harvest report and bag limit.

These changes are requested in order to address the fact that one caribou per households is not enough to provide for customary and traditional harvest and uses of caribou by Alaska residents living in Unit 13.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-027)  
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## **PROPOSAL 64**

### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Eliminate the salvage requirement for hide of moose for Alaska residents aged 60 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional as follows:

Amend 5 AAC 92.220(a)(6) as follows:

In addition to (d) of this section, the heart, liver, kidneys, and fat of caribou taken in 5 AAC 92.074(d) must be salvaged, and the head, heart, liver, kidneys, stomach and hide of moose taken in 5 AAC 92.074(d) must be salvaged, **except that moose hide salvage is optional for Alaska residents aged 60 years or older;**

**What is the issue you would like the board to address and why?** Eliminate the salvage requirement for hide of moose taken in the community subsistence moose hunt in 5 AAC 92.074(d) for Alaska residents aged 60 years and older, and instead make this salvage optional. This request is submitted on behalf of a number of Ahtna elders who indicated that the hide is too heavy for them to salvage at their ages.

**PROPOSED BY:** Ahtna Intertribal Resource Commission (HQ-F20-025)  
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## **PROPOSAL 65**

### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Eliminate the moose hide salvage requirement for hunters aged 62 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional as follows:

#### **HUNT TERMS AND CONDITIONS**

Therefore, all participants in the Copper Basin moose community subsistence harvest hunt must salvage for human consumption: 1. the head, heart, liver, kidneys, stomach, and hide.

**1(a). Transporting hide from the field is optional for CM300 participants who are 62 years and older.**

2. meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

**What is the issue you would like the board to address and why?** Revise the CM300 hunt conditions requirement that transporting moose hide from the field is optional for CM300 hunters who are 62 years and older.

Carrying hide from the field is difficult for older hunters. Moose hide is extremely heavy and large to carry from the field. Hunters 62 years and older should have the option to either leave moose hide in the field or haul it from the field.

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

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## **PROPOSAL 66**

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

Clarify the Unit 13 Tier I subsistence caribou permit condition that members of a household may not hunt caribou or moose in any other state hunts in other locations as follows:

Add words: “any member of the household obtaining a Unit 13 Tier I subsistence permit in a regulatory year for caribou may not hunt caribou or moose in any **State** authorized hunt in any other location in the state during that regulatory year.”

**What is the issue you would like the board to address and why?** Clarify regulation. Existing ambiguity in regulatory wording leads to a lack of agreement and understanding of the regulations.

Currently a regulatory condition of Unit 13 Tier I subsistence caribou permit states: “any member of the household obtaining a Unit 13 Tier I subsistence permit in a regulatory year for caribou may not hunt caribou or moose in any other location in the state during that regulatory year.”

This has been interpreted to include limitations on federal subsistence hunts. In the federal subsistence hunt qualified rural residents can hunt moose and caribou in Units 11, 12 and 13. So if a federally qualified rural resident gets a Tier I state caribou tag, there is a question as to if that federally qualified rural resident could participate in a federal subsistence moose hunt in a different unit in which they qualify.

As the Board of Game regulatory authority covers state authorized hunts, there seems to be questionable legal validity for the state to place limits on federal subsistence hunt opportunities for which they have no legal control.

This interpretation leads to confusion, may create the legal liability for future lawsuits, and seems arbitrary in nature.

Simply adding the words: in any state authorized hunt.... would clarify this issue.

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

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## **PROPOSAL 67**

### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Change the salvage requirements for sheep taken in Unit 11 as follows:

I would like to see a meat-on-bone salvage requirement for the two front quarters and two rear quarters and ribs for all sheep taken from Unit 11.

**What is the issue you would like the board to address and why?** There should be a meat-on-bone salvage requirement for sheep coming from the Wrangell Mountains. Through casual conversations with enforcement personnel and personal observation, I fear there might be a trend towards light sheep in the Wrangell Mountains. A stricter salvage requirement would aid enforcement activities and ensure that the resource is adequately used.

Boning out sheep meat in the field is a very common practice for sheep hunters. It saves the hunter weight and space in their pack for the hike out of the field. Unfortunately, careless or novice hunters can do a poor job removing all the edible meat from the bones. If they are inspected, the enforcement officer has to recreate a full sheep from a bag of scraps. It seems that it would be hard to issue a citation for a light bag without locating the kill site.

Furthermore, meat on the bone is easier to keep dry and cool. Alaska mountain weather is unpredictable and wet, particularly later in the season. Hunters also have a long trip out. Keeping the meat on the bone would ensure that it is in good quality when it arrives to the place it will be processed.

**PROPOSED BY:** Seth Wilson

(EG-F20-137)

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## **PROPOSAL 68**

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

Extend the general season for brown bear by bow and arrow only for residents and nonresidents within Unit 11 as follows:

Unit 11: **July 1 – August 9 by bow and arrow only; or** August 10 - June 30, one bear every regulatory year.

**What is the issue you would like the board to address and why?** Extending the general season for bow and arrow only would give more hunters the opportunity to spend time in the field pursuing bears within Unit 11 without having a negative impact on the resource. According to the Alaska Department of Fish and Game, only four of 55 brown bears were taken with a bow in the last five years. These reported archery harvests show the extremely low impact to the population.

**PROPOSED BY:** Alaskan Bowhunters Association

(EG-F20-097)

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## **PROPOSAL 69**

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

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

A good solution would be to increase the grizzly harvest in Unit 13 to two per year. Many hunters pass on shooting smaller bears because they only have one per year limit and are hoping to find a larger one. With a two-bear limit, hunters would be more likely to take the first one they see, and possibly make them more selective on the second bear.

**What is the issue you would like the board to address and why?** The grizzly/brown bear population in Unit 13 continues to grow. Predation on moose and caribou in the area is high, and doing more to control the population will help to increase moose and caribou populations. Every year the numbers of bears seen, and bear sign grows, along with dozens of dead moose calves found in June during the calving season, and including full grown moose killed by grizzlies throughout the summer. Adding the baiting to Unit 13 four or five years ago helped, but because a lot of the unit is way beyond reasonable for most people to keep barrels active, hunting pressure/harvest remains low.

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

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## **PROPOSAL 70**

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

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

Open a fall baiting season in Unit 13 for brown and black bear as follows:

Brown bear and black bear may be taken over bait in Unit 13 from April 15 to June 30 **and from August 20 to October 15** except that portion of Unit 13E that is Denali State Park. **Hunting brown bear over bait from August 20 to October 15 will be by registration permit only. This hunt may be closed by emergency order if a harvest goal is met.**

**What is the issue you would like the board to address and why?** We are proposing a fall bear baiting season in Unit 13 for both brown and black bears. There is a very high population of both brown and black bear in Unit 13 that are under-harvested because most of this unit is very remote and hard to access and a lot of it is heavily timbered. Many hunters who bait in the spring in this area report seeing five to ten bears on every bait station in this area. We would like to see a higher utilization of this game resource. The Department of Fish and Game has put video cameras on some brown bear in this area and some bears were observed killing or at least eating up to forty different moose and caribou in a very short period of time. Most of them calves. The Board of Game (board) has watched some of these videos. It can't hurt to take a few more of these bears. The board failed a similar proposal in February of 2015 that would have allowed fall baiting in subunit 13D for fear of over-harvest of brown bear. Some of us have hunted baited bears in the spring in this unit since 2014 and have found brown bears to be very smart and cautious around bait stations and almost always approach from far down wind. They are not easy to harvest this way. They are nothing like the bold and carefree black bears. Some of us have also baited brown bear in Unit 16 in the fall and found them to be the same in the fall there, with most coming in

after dark. There is a two brown bear bag limit in Unit 16 and there has not been a dramatically high brown bear harvest in this area, only a moderate one and the baiting season in Unit 16 runs from April 15 to October 15. We think there is almost no chance of over-harvest of brown bear on this hunt.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-010)  
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## **PROPOSAL 71**

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

Lengthen the wolverine hunting season in Unit 13 as follows:

Extend wolverine hunting season in Unit 13 to the end of February.

**What is the issue you would like the board to address and why?** Currently wolverine hunting season opens September 1 and ends January 31. We would like to extend hunting of wolverine in Unit 13 to the end of February. You can shoot wolverine in Unit 12 until the end of March. There is no biological reason not to extend the season a couple more weeks to the end of February. Just provides more opportunity to get a wolverine if you are out. There are not a lot of wolverine taken in Unit 13 in September.

**PROPOSED BY:** Copper Basin Advisory Committee (EG-F19-156)  
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## **PROPOSAL 72**

### **5 AAC 84.270. Furbearer trapping.**

Extend the wolverine trapping season in Unit 13 as follows:

November 10th to **February 29th** [FEBRUARY 15TH ]

**What is the issue you would like the board to address and why?** Extend the wolverine trapping season in Unit 13 from February 15 to February 29. Extending this season would allow for two more weeks of realistic trapping as the last 10 years have been generally late snow years and has not allowed travel by snowmachine until the middle of December. Setting a successful wolverine trapline requires long distances and longer bait exposure times than many of the other species trapped in the same areas. With no current limit, there should be no biological concern for allowing two more weeks of trapping.

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

### **5 AAC 84.270(14). Furbearer trapping.**

Extend the wolverine trapping season in Unit 13 as follows:

Extend wolverine trapping season in Unit 13 to end at the end of February.

**What is the issue you would like the board to address and why?** Currently wolverine trapping season ends February 15. We would like to extend the trapping season for wolverine to the end of February, to match other trapping seasons in Unit 13. Federal Subsistence trapping season ends on February 28 and we would like to match that (going to end of February due to leap years).

There is a good chance of incidental catch with other sets still out that wolverines could get into. Many rivers in Unit 13 are not freezing up until January/February now so access to areas is later in the season and thus does not give much time to trap wolverine. You can shoot wolverine in Unit 12 until the end of March. There is no biological reason not to extend the season a couple more weeks to the end of February.

**PROPOSED BY:** Copper Basin Advisory Committee

(EG-F19-155)

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## **PROPOSAL 74**

### **5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.**

Limit motorized access during the community subsistence moose hunt in Unit 13 as follows:

Moose: One bull with spike-fork antlers or over 50-inch antlers, or with four or more brow tines on either side.

August 20 – 31: No pack animals or motorized access except along the Parks, Richardson, Glenn, Denali Highways or Tok Cut-Off.

September 1 – 20: One bull with spike-fork or over 50-inch antlers, or four or more brow tines on either side.

Motorized access allowed (See Controlled Use exceptions.)

**What is the issue you would like the board to address and why?** Overcrowding of moose hunters in portions of Unit 13. Inequality among hunting groups. Ineffectiveness of present regulations to meet hunters of all categories needed.

This proposal addresses the hunt inequality and division that presently exists in Unit 13. The proposal also deals with the past and present inequality and ineffectiveness of the current ongoing community hunt which has failed to meet its' stated goals since its inception in spite of constant "fix-it" attempts.

We modeled our proposal in part after the very effective working model of the Unit 20 Macomb caribou hunt regulation. The Macomb hunt is a registration hunt that allows non-motorized access for both hunting groups to hunt either or both seasons without restriction. We chose not to place

a number of bulls that could be taken during the walk-in portion of the season. The local ADF&G biologist is best able to address that issue should it become necessary.

Our proposal restricts no one. Nor does it give any particular user group a defined advantage. Contingent for the success of these regulations the elimination of the community hunt in its entirety.

The unregulated advantage of this proposal is that local hunters will face less competition there hunting. Locals will be able to hunt almost any day of the season, whereas out-of-area hunters will need to travel substantial distances. Also, familiarity with local areas will offer residents a substantial step up on other groups. Additionally, rural users will still retain their federal hunt opportunities.

**Information:**

Sixty-three percent of successful local hunters used motorized transport to hunt moose. Ninety percent of out-of-area hunters used motorized transport.

One step further: a respondent quoted in Section 5 of Foraging and Motorized Mobility in Contemporary Alaska by ADF&G Subsistence Division (James Van Lane): “hundreds, if not thousands of hunters come to Unit 13 for the CSH. They come in \$100,000 motorhomes and they bring multiple \$10,000 all-terrain vehicles... They’re competing with people who actually need the meat.”

The community hunt was designed with the local population in mind. Our proposal gives them that opportunity in a workable format.

Without this regulation we will see the continuation of a very divisive and unsuccessful community subsistence hunt with the local needs far from being met.

**PROPOSED BY:** Paxson Fish and Game Advisory Committee (EG-F20-011)  
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**PROPOSAL75**

**5 AAC 92. 5 AAC 92.075. Lawful methods of taking game.**

**5 AAC 92.540. Controlled use areas.**

Close the Tokositna State Recreation Area in Units 13E and 16A to the use of airboats for hunting as follows:

The Tokositna State Recreation Area, except the Tokositna River, is closed to the use of airboats for hunting, between April 20 through September 30, annually.

**What is the issue you would like the board to address and why?** According to 11 AAC 20.985, the Tokositna State Recreation Area, except the Tokositna River, is closed to the use of airboats between April 20 and July 10 annually. The rationale for this regulation is to protect the habitat of trumpeter swans. I propose that the language in this regulation is revised and adopted into ADF&G regulations within 5 AAC 92.075 so that the Tokositna State Recreation Area, except the Tokositna River, be closed to the use of airboats from April 20 through September 30 annually. This change is to not only protect the bird habitat but also to prevent unfair chase of moose during hunting

season. Airboats draw so little water that they have the ability to jump riverbanks and leave navigable waterways to access miles of interconnected swamps where birds are nesting and moose are subsisting. This not only endangers the nesting habitat of migratory birds, it also constitutes unfair chase of moose during hunting season.

I am an Alaska resident since 1980, a recreationist and riverboater in the Tokositna Recreation Area, and a property owner on Bunco Lake near the Tokositna River. I have been hunting moose in this area for over 35 years. I have personally witnessed numerous infractions by airboat owners who disregard the laws and regulations, endanger the environment, destroy sensitive habitat, and thumb their noses to the ethics of fair chase. They jump the banks, use beaver dams as ramps, and destroy fragile vegetation as they pursue a moose using a motorized boat away from the navigable waterway.

**PROPOSED BY:** Vincent Pokryfki

(EG-F20-015)

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## **PROPOSAL 76**

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

Extend the ptarmigan season and the lower bag limit in Unit 13B and 13E as follows:

I understand the criticality of holding a stable population in an area and support that, but the changes last year were too dramatic in cutting the season so short. While I don't see any decrease in birds, I would suggest an alternative: decreasing the bag limit to five per day, per person, and increasing the time back to March 31, in both Unit 13B and 13E, areas that are susceptible to more traffic along the Denali and Richardson Highways.

Decreasing hunting opportunities is always bad for the sport, when populations are healthy. There are many new hunters coming into the sport that birds offer an opportunity to get those new hunters interested and active, and many of those used to hunt in the March season, when the temperatures and weather are a little more comfortable. I have rarely ever bagged ten birds in a day, and I don't know many people that do that consistently. This option gives us more time in the field with at least a chance at getting a few birds for dinner.

**What is the issue you would like the board to address and why?** Ptarmigan hunting. The season was recently cut back in Unit 13E to February 15 (was March 31). The season was increased in 13B to February 15, (was November 30). Numbers of birds have been stable and doing well in both units by my personal view, living in the middle of those units and being in the field more than 250 days a year for the last 11 years. Hunting pressure in the area has increased due to the increased caribou tags that have been put out in recent years, pushing the birds away from the roads, but they are still there.

**PROPOSED BY:** Claude Bondy

(EG-F19-144)

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**PROPOSAL 77**

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

Open a youth only hunt for ptarmigan in Unit 13, August 10-24 as follows:

Ptarmigan – Unit 13B: 10 per day; 20 in possession.

Hunters under 16 (youth): August 10 – February 15

Hunters greater than 16: August 25 – February 15

**What is the issue you would like the board to address and why?** Ptarmigan seasons in Unit 13B. Ptarmigan season begins August 10 and goes through February 15. Ptarmigan hatch late in Unit 13B. The young birds are too small to eat – lots of waste in early birds. Opening the season later would help mitigate that.

**PROPOSED BY:** Paxson Fish and Game Advisory Committee (EG-F20-010)  
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## **Palmer Area Proposals – Units 14A, 14B & 16**

### **PROPOSAL 78**

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

Extend the caribou season in Unit 16B as follows:

Open Season: August 10 - October 15

Alternative Open Season: August 10 - October 10

**What is the issue you would like the board to address and why?** Extend caribou season until October 15. For many years the caribou season was open well into October and many years ago it was open much of the winter. Due to the wolf predation issue many years ago the season was cut back and in 2005 was extended to September 30. The climates have been changing to the point we are all seeing moose and caribou ruts seemingly taking place later and later in the year. Finally some biologists are admitting to researching and discussing how hunting seasons and animal behavior is changing. The biggest and oldest bulls are not coming down to lower elevations and gathering cows anywhere near as early in the year as they used to. Snows are not driving them down as the winters are coming later. The best harvest for the herd is the older bulls, animals that are at the tail end of their life anyways. Quality of mature bulls has fallen historically in my opinion as well as numbers harvested. Before 2005 when the season changed to September 30 there was only a handful of caribou harvested in as the season closed September 20 in Unit 16B. In the last five years a total of 68 caribou have been harvested in Unit 16 with all but one of those taken in 16B. 2019 was the most with 22 harvested and it is also the coldest and best snow year in many we have had. We recognize the concern over rutted meat with late season caribou, however for many years we dealt with that and the law requires us to take the meat. I donated lots of caribou meat to the native hospital last season per their request through the Alaska Professional Hunters Association (APHA). I followed the delivery and pick-up of this meat. I also followed up to inquire of there satisfaction with it as well as how to cook and prepare it as late season caribou can be prepared differently. The feedback was fantastic and they are looking for more this next season. The additional hunting time in the field would allow trophy sport hunters (both resident and nonresident) the opportunity to spend more time in the field. License and tag sales would be beneficial to ADF&G and the general economy would benefit if more tourism was in place later in the season. There has not been much interest or money spent in Units 16 or 19 the last many years on caribou populations. The additional Pittman Robinson match may be helpful in accomplishing this. I do not believe going back to the historical later season dates will negatively impact the population, as most hunters this time of year are after bigger older bulls.

If the season is left as is, the older bulls that are not seen during the hunting season will just die of old age and no-one benefits, except maybe a slow cow or two!

**PROPOSED BY:** Steven Perrins

(EG-F20-148)

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## **PROPOSAL 79**

### **5 AAC 85.045(a)(12). Hunting seasons and bag limits for moose.**

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

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

Moose surveys conducted in February 2019 yielded an estimate of 7,900 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2017 survey estimate of 8,756 moose indicating that the increased antlerless harvests are having the desired effect of reducing the population. A sex and age composition survey completed in 2019 demonstrated a bull ratio of 34 bulls:100 cows and a calf ratio of 29 calves:100 cows.

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. Harvest from the increased permit levels is expected to bring the population back to within the objective for the unit of 6,000–6,500. Without this harvest the density of moose will increase and we anticipate an increase the number of moose-human conflicts, and moose may experience nutritional stress as the population nears carrying capacity.

The targeted moose hunts in Units 14A and 14B are an effective tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 267 moose per year were killed in the Matanuska-Susitna Valley area during the last few years of average snowfall and substantially more were killed during higher snowfall years. The Department of Fish and Game also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-068)  
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## **PROPOSAL 80**

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

Create a resident youth hunting season for any bull moose (YM4XX) in Unit 14A as follows:

**One moose every regulatory year, August 20 – September 25 and November 15 - January 31.**

**No open nonresident season.**

**Youth hunt drawing permit: up to 50 permits may be issued.**

**What is the issue you would like the board to address and why?** Currently there are no resident youth any bull moose draw permits for Unit 14A. There is currently a youth bull moose hunt in neighboring Unit 16B, YM541. However, access to Unit 16B requires use of equipment, such as boat, plane, or snowmachine. There seems to be plenty of moose near the roadways and public use areas in Unit 14A for youth to participate. With declines nationwide regarding youth participation, I feel making more opportunities can increase our numbers here in Alaska.

Creation of a resident youth hunt in 14A would follow the guidelines found in YM541:

Eligible applicants: Resident youth who are 10 to 17-years-old. Each permittee must be accompanied in the field by a licensed resident adult at least 21-years-old. Bag limit counts against the bag limit of BOTH the permittee and the accompanying adult. Permittees and accompanying adults must wear hunter orange vests. Basic hunter education is required for all youth hunters participating in youth drawing hunts, regardless of their age or if their accompanying adult has basic hunter education.

The latest reports (at time of writing this) indicate the following harvest statistics for bull moose in 2018:

14A General Harvest Ticket	378 moose
16B General Harvest Ticket	179 moose
16B YM541 Draw Permit	16 moose

If the youth in YM541 are taking less than ten percent of moose compared to general harvest ticket hunters in 16B, we could assume a good starting point for the any bull youth hunt in Unit 14A would be around 35 animals. However, number of draw permits would be subject to latest herd population counts as well as 2019 harvest information. I do know that youth have the Unit 14A Point Mackenzie antlerless hunt, YM412, but for the bull hunt, I think it would be ideal to have the entire unit to provide the hunters more land opportunities for their harvest. Seasons would run similar to YM541, with dates August 20 – September 25 and November 15 - January 31.

**PROPOSED BY:** Tyler Eggen

(HQ-F20-001)

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## **PROPOSAL 81**

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

Allow muzzle loading and black powder cartridge long guns be used for harvesting moose in Units 14A and 14B as follows:

I would suggest, if the Board of Game (board) adopts this proposal, that the definitions of legal muzzleloader and black powder cartridge rifles as stated in the Delta bison hunt hunting information on the ADF&G web page be used. These definitions are as follows: muzzleloader: muzzle loading rifles must be .54 caliber or larger, or at least .45 caliber with a 300 grain or larger elongated slug; black powder cartridge rifles: must fire a 400 grain bullet or larger loaded with a minimum of 70 grains of black powder or equivalent (.45-70 with a 400 grain bullet or a .44-90 with a 550 grain bullet).

These definitions are considered adequate for harvesting bison so they should work just fine for moose. The number of prospective hunters who might choose to use these types of harvest tools would be relatively small, but having the ability to use a favorite muzzleloading firearm or black powder cartridge rifle would greatly enhance the experience.

The average hunter who might choose to use these black powder weapons is usually knowledgeable and experienced in their use.

**What is the issue you would like the board to address and why?** The current regulations specify that a shotgun with slugs, a crossbow, or a bow and arrow are the only legal hunting tools allowed for participants in the targeted hunts in Units 14A and 14B. Because the hunts occur along highway corridors and near housing, a harvest tool with a relatively short range yet capable of killing a moose is required for safety reasons.

For hunters who are older or disabled, this hunt offers the best opportunity to harvest a moose if the individual is selected to participate in the hunt. For others, the ability to use a firearm type other than a shotgun would enhance the hunting experience beyond just shooting an animal.

Because they are also relatively short-range firearms, with ballistics similar to shotguns with slugs, I propose adding muzzleloading and black powder cartridge long guns to the list of allowable harvest tools.

**PROPOSED BY:** Howard Delo (EG-F20-029)

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## **PROPOSAL 82**

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

Extend by two days the current bow and arrow only general moose season in Units 14A, 14B, and 16A as follows:

Unit 14A: One moose per regulatory year, only as follows: One bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines on one side, by bow and arrow only, August 10 - August **19** [17].

Unit 14B: One moose per regulatory year, only as follows: One bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines on one side, by bow and arrow only August 10 - August **19** [17].

Unit 16A: One moose per regulatory year, only as follows: One bull with spike-fork antlers or 50-inch antlers or antlers with three or more brown tines on at least one side, by bow and arrow only; August 10 – **19** [17].

**What is the issue you would like the board to address and why?** Extending the current bow and arrow only hunt for moose will allow hunters who choose to begin hunting during the early season to continue right on into the general season. From 2014 to 2018, only 5% of moose harvested during the general season in Units 14A, 14B, and 16A were taken in the bow and arrow only time frame. An additional two days of hunting with bow and arrow will not have any negative affect on the resource.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F20-058)

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## **PROPOSAL 83**

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

Remove the 50-inch bag limit requirement for the resident and nonresident moose hunt in Unit 16A as follows:

Regulation to read: spike/fork and "must have three or more brow tines".

**What is the issue you would like the board to address and why?** Enforcement of 50-inch three brow tine regulation. To many sublegal moose are being taken. To many times I hear and see 44 to 48-inch moose taken with only two brow tines and people either leave them lay or take them out of the field in hopes to not get caught. This has to change. Our moose population is diminishing to fast. Last survey we had 1,700 moose counted, a year later only 895 were seen. The chairman

even asked what happened? With the winter of 2019-2020 we have had a lot of moose winter kill. Around a 3-mile radius of my house alone I know of four winter kills. I expect to see way more as snow melts. We need a change! We need the 50-inch requirements removed.

**PROPOSED BY:** Neil DeWitt

(EG-F20-012)

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## **PROPOSAL 84**

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

Establish an antlerless moose season in Unit 16B as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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#### **RESIDENT HUNTERS**

If the harvestable portion is  
199 moose or less; up to 400  
total Tier II permits may be  
issued;

1 bull with spike-fork antlers  
or 50-inch antlers with 3 or  
more brow tines on one side  
by Tier II subsistence hunting  
permit only; or

Aug. 20–Sept. 30  
(Subsistence hunt only)

1 bull by Tier II subsistence  
hunting permit only; or

Dec. 15–Mar. 31  
(Subsistence hunt only)

if the harvestable portion is  
greater than 199 moose, but  
less than 241 moose;

1 bull with spike-fork antlers  
or 50-inch antlers with 3 or  
more brow tines on one side;  
or

Sept. 1—Sept. 20

1 bull by Tier II subsistence  
hunting permit only; up to  
260 permits may be issued; or

Dec. 15–Mar. 31  
(Subsistence hunt only)

If the harvestable portion is  
greater than 240 moose:

1 bull with spike-fork antlers  
or 50-inch antlers with 3 or  
more brow tines on one side;  
or

Aug. 20–Sept.25

1 bull by drawing permit  
only; up to 75 percent of the  
combined drawing permits in  
the area may be issued to  
non-youth hunters; up to 600  
permits may be issued;  
provided that the harvestable  
portion is greater than 310  
moose; or

Aug. 20–Sept.25  
(General hunt only)

1 bull by youth hunt drawing  
permit only; up to 25 percent  
of the combined drawing  
permits in the area may be  
issued to youth hunters;  
provided that the harvestable  
portion is greater than 310  
moose; or

Aug. 20–Sept.25  
Nov. 15—Jan. 31  
(General hunt only)

1 bull by registration permit  
only; or

Dec. 15–Last Day of Feb.

1 bull by drawing permit  
only; up to 500 permits may  
be issued; or

Dec. 15–Last Day of Feb.

1 **moose** [bull] by Tier II  
subsistence hunting permit  
only; up to 260 permits may  
be issued; or

Dec. 15–Mar. 31  
(Subsistence hunt only)

**1 antlerless moose by  
drawing permit only; up to  
200 antlerless moose  
permits may be issued**

**Aug. 20 –Sept. 25  
Nov. 15 –Jan. 31  
(General hunt only)**

## NONRESIDENT HUNTERS

1 bull with spike-fork antlers  
or 50-inch antlers with 3 or  
more brow tines on one side;  
if the harvestable portion is  
greater than 240 moose

Aug. 20–Sept. 25

...

**What is the issue you would like the board to address and why?** As of February 2019, the Unit 16B moose population is estimated at  $9,984 \pm 1702$  (80% CI) moose. The population objective for Unit 16B is 6,500–7,500 moose.

Moose harvest has been steadily increasing since regulatory year 2012 and has been within the harvest objective (310–600) since 2015. The Department of Fish and Game sought to address the high bull-to-cow ratios by increasing the number of drawing permits available for the fall hunt. Bull to cow ratios have been reduced in portions of the unit. In the middle portion of Unit 16B the bull:100 cow ratio was 42 in 2011 and 38 in the fall of 2019. In the southern portion of the unit the bull:100 cow ratio was 52 in 2010 and 32 in the fall of 2019. The Board of Game approved a winter registration and a winter draw hunt with an ‘any bull’ bag limit in the spring of 2016. However, concerns were raised by the local communities that mid-winter bull hunts may stress cows as hunters search for a legal animal. The moose population itself was not deemed to be over the objective until surveys were completed in the spring of 2018. Additional bull permits will not address the reproductive segment of the population and would likely not be sufficient to bring the population back to the objective. Current winter opportunities include a Tier II ‘any-bull’ hunt and a youth draw hunt.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-072)  
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## **PROPOSAL 85**

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

Establish a registration hunt for bull moose limited to resident certified bowhunters only within Unit 16B as follows:

Institute a registration hunt open to certified bowhunters only with harvest reporting requirements to be set by the Department of Fish and Game (ADF&G). This hunt would be subject to the same residency requirements, bag limit, season dates and area as outlined in DM540. The purpose of this new hunt being a registration hunt would be so that ADF&G can monitor the participation and success rates more closely. The purpose of this hunt would be to give bowhunters a higher percentage of legal animals to pursue while still having limited success in harvest.

**What is the issue you would like the board to address and why?** A registration hunt for certified bowhunters only would give more resident hunters the opportunity to pursue a higher percentage of legal moose within Unit 16B without having a negative impact on the resource. According to ADF&G, 2,902 moose were harvested in Unit 16B from 2009 to 2018. According to the area biologist, only 46 of the 2,902 moose harvested were reported taken with archery equipment.

These reported harvests with bow and arrow account for less than 2% of all moose taken in Unit 16B over a 10-year period, showing the extremely low impact to moose populations. According to recent surveys by ADF&G (as of spring 2020), the moose in Unit 16B are approximately 2,500 over population objectives. There is only one registration hunt for moose in the State of Alaska that is limited only to certified bowhunters (RM445). From 2009 to 2018, hunters participating in RM445 have only seen a 2.3% success rate according to ADF&G. RM445 is a great example of the low impact a bow and arrow only hunt would have on moose populations in an any bull area.

Lastly, having a registration hunt rather than taking off limitations for the general season would allow ADF&G to collect data, closely monitor success rates, as well as issue emergency orders if the need ever arises.

**PROPOSED BY:** Gary Weaver

(EG-F20-052)

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## **PROPOSAL 86**

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

Change the bag limit for Dall sheep in Unit 14A to full-curl ram as follows:

Change Unit 14A sheep draw permit bag limit from one [ANY RAM] to: **One ram with full-curl horn or larger, both horn tips broken or 8 years old or older.**

**What is the issue you would like the board to address and why?** We would like to have the any ram draw permits in Unit 14A changed to full curl permits. This regulation was put into effect in 2008 to try and grow the older ram population but there are currently 53 permits being issued for any ram. With the rise of sheep hunting popularity this has created more harvest of younger rams and less preservation of mature Chugach rams. There has been virtually no increase in the mature ram population during the 13 years that the any ram regulation has been in place. It has failed to do what it was put in place to do. Many areas in Unit 14A used to have an abundance of large, mature rams and we think this is the first step in returning this area to its original abundance again.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee

(HQ-F20-006)

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## **PROPOSAL 87**

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

Change the bag limit for the Dall sheep permit hunts in Unit 14A and convert the early season to archery only permit hunts as follows:

Unit 14A: DS170 - DS180 - DS190 - DS270 - DS280 - DS290 - (Resident and Nonresident)

Allocate the first half of the Dall sheep draw permits to archers only for "any rams".

DS175 - DS185 - DS195 - DS275 - DS285 (Resident & Nonresident)

Allocate the second half of the draw permits to any weapon and "full-curl rams" only.

Address the discrepancy of the "any ram" regulation and management of sheep in Unit 14A. Address dates between the first portion of the season and or the second portion of the season for weapon restrictions. Allow more rams to reach maturity with the archery regulations, as there is ADF&G data proving the low harvest success of archers. Approximately 130 rams have been harvested with archery equipment in the state of Alaska over the past 10 years (approx. 1%), those numbers include archery only draws and general harvest hunts. The low success rate of archers would not have a significant impact on this "any ram" hunt. Changing the any weapon portion of this proposed draw to full-curl only will allow more rams to reach maturity and a larger population of Dall sheep. Dates of the weapons restrictions is less important than allowing the opportunity to harvest rams for both "any ram" hunters and "full-curl" hunters.

**What is the issue you would like the board to address and why?** The Dall sheep permits available in Unit 14A for less than full curl rams. Addressing the discrepancy in sheep population, and trophy rams versus hunt opportunity of Dall sheep in Unit 14A.

**PROPOSED BY:** Austin Manelick (EG-F20-020)

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## **PROPOSAL 88**

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

Establish an archery only general season hunt for Dall sheep in Unit 14 as follows:

Create an early archery season from August 1- 9 before the general sheep season. This would provide a great opportunity for archery hunters by opening an earlier time frame for archery only hunters to pursue sheep. This also gives incentive to go out and hunt sheep before the general season. The early season would also allow for more guided hunts for nonresidents by extending another nine days to the left. Archery hunting has very low success rate and would not effect the overall population of sheep in this area. With the success rate being less than one percent, over harvest would not be an issue. The new season would only be for Unit 14A and 14B remainder, by general season.

**What is the issue you would like the board to address and why?** Create more opportunities for archery hunters in Alaska. Archery hunting in Alaska is gaining popularity and it only makes sense to create more seasons and opportunities for Alaska's archery hunters. Making an early season for Dall sheep archery only would allow archery hunters to hunt sheep that have not been pressured by fellow hunters yet. Even with an early season for archery hunters, the success rate would still be low and the sheep population would not be affected.

**PROPOSED BY:** Drew Kress (EG-F20-057)

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## **PROPOSAL 89**

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

Establish a registration hunt for Dall sheep open to certified bowhunters only, by longbow or recurve bow only within Unit 14A, Metal Creek area as follows:

Institute a registration hunt open to certified bowhunters only with season dates starting on October 5 and closing on October 15 or by emergency order. Hunters participating in this hunt would be limited to the use of longbows or recurve bows only. The area would be the same as already established in DS170. The bag limit for residents would be one ram with full-curl horn or larger and the bag limit for nonresidents would be one ram with full-curl horn or larger every four regulatory years. Successful hunters would be required to report within three days of kill while unsuccessful hunters must report within 15 days of season end.

This new registration hunt would be for the Metal Creek area only.

**What is the issue you would like the board to address and why?** A registration hunt limited to the use of traditional bowhunting equipment would give more hunters the opportunity to spend time in the field pursuing sheep within Unit 14A while having no impact on the resource. Only about 1% of sheep taken in Alaska are done so with archery equipment and even less are taken with longbows or recurves. Traditional bows, while just as lethal as compound bows, require the hunter to get much closer to game in order to make an accurate shot, thus increasing the challenge by a large margin. Bowhunters using traditional equipment must usually get within approximately 20 yards of game, while compound archers are generally able to take shots on game at much greater distances. The limitations of traditional bows would make it very difficult to harvest sheep while still allowing more hunters the opportunity to pursue them.

The purpose of this new hunt being a registration hunt would be so that the Department of Fish and Game (ADF&G) can monitor the participation and success rates more closely.

The purpose of the season being October 5 to October 15 would be so not to conflict with already existing hunts in the unit while at the same allowing ADF&G to determine an acceptable harvest quota based on reports already received from the preceding drawing permit hunts.

This hunt would fall under the full-curl regulation ensuring that the breeding population of rams will not be affected.

Having an additional hunt would bring in more revenue to the state of Alaska as well as to local communities.

DS140 and DS240 are held in Unit 14C and are good comparisons for archery success rates. These two hunts are open to certified bowhunters only and are both held from October 1 through 10. Even with the opportunity to use conventional compound bows, only 31 of 376 bowhunters have been successful from 2009 to 2018. These hunts do not have size or age restrictions and some of the sheep taken during this time were also recorded as ewes. Hunters limited to the use of traditional longbows and recurves would have even less success taking mature rams than have been experienced in these established bow only drawing permit hunts.

**PROPOSED BY:** Mike Harris

(EG-F20-119)

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## **PROPOSAL 90**

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

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

I recommend extending brown bear season through June 30 allowing these bears to be taken through the baiting season. The new regulation change would read “One bear every regulatory year September 1 - June 30 in Unit 14A and “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 14 is growing rapidly. In the span of four years my trail cameras in Unit 14 over bait have shown 1-2 brown bears and 5-6 black bears in 2015 and in 2019 7-8 brown bears and only 1 black bear. Brown bear season closes on May 31 and there is no closed season on black bears

currently in Unit 14. 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.

**PROPOSED BY:** Landon Albertson (EG-F19-145)

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## **PROPOSAL 91**

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

Establish a general season by bow and arrow only for brown bear within Units 14A and 14B as follows:

Unit 14A **June 1 – June 30 by bow and arrow only; or** September 1 - May 31; one bear every regulatory year.

Unit 14B **June 1 – June 30 by bow and arrow only; or** August 10 - May 31; one bear every regulatory year.

**What is the issue you would like the board to address and why?** Extending the general season for bow and arrow only would give more hunters the opportunity to spend time in the field pursuing bears within Unit 14A & 14B without having a negative impact on the resource. According to the Alaska Department of Fish and Game, only one of 87 brown bears were taken with a bow in Unit 14A and 14B from 2014 to 2018. These reported archery harvests show the extremely low impact to the population.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F20-054)

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## **PROPOSAL 92**

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

Open a year-round season for brown bear in Unit 16 as follows:

Change Unit 16 brown bear season back to **No Closed Season.**

**What is the issue you would like the board to address and why?** Change the Unit 16 brown bear season back to NO CLOSED SEASON. There is no closed season for black bear in this unit and the baiting season runs from April 15 to October 15. With this season closed a hunter can't take a brown bear at their bait station if one appears during the closed portion of the season. There is an abundance of both black and brown bears in this area with a high predation rate on moose calves. There is no threat of over harvest in this very heavily forested unit and by opening this back up, it gives hunters a little more opportunity to hunt and potentially alleviate problem bears without the process of a defense of life and property (DLP) bear situation.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-005)

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## **PROPOSAL 93**

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

Open a year-round season for brown bear in Unit 16 as follows:

The new regulation would read " no closed season."

**What is the issue you would like the board to address and why?** I would propose to change the season dates for brown bear to be open all year round as it was before. This will give opportunity for hunters with limitations to hunt while bears are lower on berries as well as on the salmon streams. It would also avoid DLP (defense of life and property) issues for anyone encountering trouble bears while fishing. With the loss of the spring season and a likely hood that less nonresident and resident hunters will be hunting this fall or even into next season. We need to stay ahead of this curve. The additional income to ADF&G will be well needed to make up for loss of license and tag sales from hunt cancellations. I saw no justification to have closed the June 15 to August 10 period that was historically in place for many years. This caused a loss of opportunity for archery hunters and youth hunters that could more easily hunt the streams and low berry areas.

If the season remains closed from June 15 to August 10 the population will increase faster with the loss of our past spring season and moose will become more at risk with predation in a short period of time. Resident hunters and nonresident hunters will benefit from opportunity and the state will recover some of the license and tag money as well as Pittman Robinson triple matching funds. Guides, charter services as well as local economies would also benefit from the economic side, and help recover some Covid-19 losses. There does not appear to be any negative conservation issue and most likely a positive for future moose populations.

**PROPOSED BY:** Steven Perrins

(EG-F20-138)

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## **PROPOSAL 94**

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

Establish a general season by bow and arrow only for brown bear within Units 16A and 16B, remainder as follows:

Unit 16A: **June 16 – August 9 by bow and arrow only; or** August 10 - June 15; two bears every regulatory year.

Unit 16B, that portion within a one-mile radius of the mouth of Wolverine Creek (at 60.80° N. lat., 152.31 ° W. long.); September 15 - May 31; two bears every regulatory year.

Remainder of Unit 16B **June 16 – August 9 by bow and arrow only; or** August 10 - June 15; two bears every regulatory year.

**What is the issue you would like the board to address and why?** Extending the general season for bow and arrow only would give more hunters the opportunity to spend time in the field pursuing bears within Unit 16 without having a negative impact on the resource. According to the Alaska

Department of Fish and Game, only 65 of 460 brown bears were taken with a bow in Unit 16 from 2014 to 2018. These reported archery harvests show the extremely low impact to the population.

**PROPOSED BY:** Alaskan Bowhunters Association (EG-F20-060)

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## **PROPOSAL 95**

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

Lengthen the brown bear season in Unit 16B for residents and nonresidents as follows:

Brown bear season dates for residents and nonresidents, Unit 16B: August 10 - June 30. Made effective by emergency order for spring 2021.

**What is the issue you would like the board to address and why? ?** In 2018 the brown bear season in Unit 16B was changed from "No Closed Season" to August 10 - June 15. Most of Unit 16B has an extremely high snow pack and is difficult access during the month of May. June is the prime time for hunting bears in most of the unit

and the season now closes June 15. With the loss of the nonresident brown bear season during April and May of 2020, there will be a surplus of bears in 2021. I believe it is important to lengthen the season through the end of June and make it effective immediately.

**PROPOSED BY:** Jonah Stewart (EG-F19-160)

\*\*\*\*\*

## **PROPOSAL 96**

### **5 AAC 92.085 (8). Unlawful methods of taking big game; exceptions.**

Allow the take of black bear in Unit 16B the same day a hunter has flown as follows:

Under same day airborne EXCEPTIONS: You may hunt black bear the same day airborne in Unit 16B (provided you are 300 feet from the airplane).

**What is the issue you would like the board to address and why?** Since the closure of the black bear predator control program in Unit 16B there has been limited participation amongst resident hunters hunting black bears in much of Unit 16B. Running bait stations is time consuming and flying in and camping overnight is more than many residents want or have time for.

**PROPOSED BY:** Jonah Stewart (EG-F19-159)

\*\*\*\*\*

## **PROPOSAL 97**

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

Allow beaver to be taken with firearm or archery equipment in Unit 16 as follows:

Re-write regulation to read: and in Unit 16 beaver may be taken throughout the trapping season with a firearm or archery equipment.

**What is the issue you would like the board to address and why?** Change regulations in Unit 16 to allow beaver to be taken with archery equipment as well as firearms.

Unit 16 has had a beaver population explosion the last 15 or so years. The Department of Fish and Game now allows beaver to be taken with a firearm in Unit 16 throughout the trapping season, as well as in many other units of the state. I have had several clients ask if they could shoot them with their bow and arrow while they are hunting with us, and the answer has to be NO. We need to thin out the beavers, and although, I don't feel there will be a lot of archery effort, I know there will be some and those folks will also need to purchase a hunting license. Archery equipment is plenty capable of killing a beaver and with a fishing/bow they would also have no trouble retrieving them. In fact, most likely better than with a rifle.

Of course, it would be much more effective if they approve my other proposal to open the season in August as well.

Please open the opportunity to more sportsman and help me get rid of a few more dam engineers in the process!! Thank you.

**PROPOSED BY:** Steven Perrins (EG-F20-155)  
\*\*\*\*\*

## **PROPOSAL 98**

### **5 AAC 84.270. Furbearer trapping.**

Extend the beaver trapping season in Unit 16 as follows:

Change beaver trapping season in Unit 16 to August 10 - May 31.

**What is the issue you would like the board to address and why?** Change trapping season in Unit 16B to start August 10. The beaver in Unit 16B have increased in population to a nuisance level in many areas. The flooding has caused major issue to hunters access to much of the good moose hunting as well as flooded historic trails. The Department of Fish and Game is willing to issue permits to harvest out of season, but this is not as effective. If the hunting season was open in August when resident and nonresident hunters are in the field we could sell non-resident trapping licenses to many hunters and they could thin out the beaver population a bit and at the same time contribute to revenue to the state. With the low price of furs for so many years, beaver are not worth the effort for most trappers to dig through several feet of snow and then ice to set traps for a furbearer that brings in \$30 after lots of skinning and fleshing. Clients and resident hunters would be more likely to harvest the beaver when it is convenient and could keep the hides and donate the meat to folks with dog teams that would love to have it. With nonresident trapping/hunting licenses selling for \$405 the state would again benefit the well needed income and the match from Pittman Robinson funds.

I see no downside to this as it is not going to turn into a commercial harvest, but will definitely help get the beaver population back in check. At the least open it August 25 one month earlier and give it a shot.

**PROPOSED BY:** Steven Perrins (EG-F20-153)  
\*\*\*\*\*

## **PROPOSAL 99**

### **5 AAC 92.550. Areas closed to trapping.**

Close areas within Units 14A, 14B, and 16A to trapping as follows:

Furbearer trapping should be closed in the following areas: (1) within one quarter mile of any permanent dwelling; (2) within 50 yards of any developed hiking trail or groomed ski trail; (3) within one quarter mile of any trailhead for a developed hiking trail, or groomed ski trail; (4) within one quarter mile of any developed campground; (5) within the Hatcher Pass Public Use Area; and (6) within the Palmer Hay Flats State Game Refuge.

The following regulatory language is suggested:

### **5 AAC 92.550 Areas Closed to Trapping.**

(1-6) No change.

Add:

(7) One quarter mile of permanent dwellings, which are defined as buildings used primarily as permanent residences or businesses; but which definition does not include cabins with less than 800 square feet of livable space which are unoccupied a majority of the time.

(8) 50 yards of a developed hiking trail or groomed ski trail. Developed hiking trails are defined as trails for which public funds have been spent within the previous five years for construction and maintenance; and groomed ski trails are defined as trails which are routinely maintained and groomed to provide the public with recreational skiing venues. A list of developed hiking trails and groomed ski trails shall be maintained by the department.

(9) One quarter mile from the trailhead for any developed hiking trail or groomed ski trail.

(10) One quarter mile from any developed campground. Developed campgrounds are defined as campgrounds for which public funds have been spent in the previous five years for construction or maintenance; a list of which shall be maintained by the department.

(11) The Hatcher Pass Public Use Area as designated in AS 41.23.130.

(12) The Palmer Hay Flats State Game Refuge as designated in AS 16.20.032.

**What is the issue you would like the board to address and why?** The Board of Game should address the danger to people and their pets, primarily dogs, that is posed by traps placed in developed areas with numerous permanent dwellings, and the danger to people and pets posed on or near developed hiking trails, and groomed ski trails; and also address the need for watchable wildlife in areas visited by large numbers of recreational hikers, mountain bikers, ice skaters, boaters, and skiers.

**PROPOSED BY:** Kneeland Taylor

(EG-F20-045)

\*\*\*\*\*

**PROPOSAL 100**

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

Remove the requirement that traps and snares for beaver be submerged in Unit 16 as follows:

For a solution remove the restriction in the trapping regulations on page 31 in Unit 16 that states a trap must be submerged.

**What is the issue you would like the board to address and why?** For fall beaver trapping. I would like to change the part that snares and traps must be submerged from September 24 - November 9.

During the fall on the river, water fluctuates and usually goes down. An example would be you set a trap that is submerged. The next day you come back and water has dropped over six inches so the trap is exposed. You now have an illegal set trap because the trap is not submerged.

**PROPOSED BY:** James Hoehn

(EG-F19-148)

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# Statewide Regulations

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**ALASKA BOARD OF GAME  
Statewide Regulations Meeting  
Pike's Waterfront Lodge, Fairbanks, Alaska  
March 12-19, 2021**

**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 12, 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 13, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

**Sunday, March 14, 9:00 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded BOARD  
DELIBERATIONS upon conclusion of public testimony

**Monday, March 15 through Thursday, March 18, 8:30 a.m.**

BOARD DELIBERATIONS continued

**Friday, March 19, 8:30 a.m.**

BOARD DELIBERATIONS continued/conclude

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

**Agenda Notes**

- A. 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](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. 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.

## **Definitions**

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### **PROPOSAL 101**

#### **5 AAC 92.990(11). Definitions.**

Change the definition for bows to include crossbows as follows:

I would like to see the definition for archery to include crossbows. The crossbow has a string and arms just like a regular compound bow or recurve bow. Yes it's more accurate but for people that cannot pull and hold a regular bow any longer they shouldn't be eliminated from a hunting opportunity and be able to use the crossbow.

**What is the issue you would like the board to address and why?** Change archery definition.

**PROPOSED BY:** Neil DeWitt

(EG-F19-024)

\*\*\*\*\*

### **PROPOSAL 102**

#### **5 AAC 92.990. Definitions.**

Establish a definition for "primitive weapons" to include crossbow, longbow, shotgun, and muzzleloader as follows:

Primitive weapons include: crossbow, longbow, shotgun, and muzzleloader. These are the four primitive weapons as described in the lower 48 states. Alaska is a state just as they are and we need to change our primitive weapons description to meet the same. It will be less confusing for people from the lower 48 when they come to Alaska to hunt in a special weapons hunt.

**What is the issue you would like the board to address and why?** Change definition of hunts from archery/muzzle loader to primitive weapons.

**PROPOSED BY:** Neil DeWitt

(EG-F19-025)

\*\*\*\*\*

*The Board of Game addressed the following proposal at the Interior and Eastern Arctic Region meeting in March 2020 (see Proposal 129). The board adopted the proposed dates to align the Controlled Use Areas and deferred the request for clarification of "hunting gear" to the 2021 Statewide Regulations meeting. The request to clarify the definition of "hunting gear" is the only portion of this proposal scheduled for the meeting.*

### **PROPOSAL 103**

#### **5 AAC 92.990. Definitions.**

Clarify whether hay and grain are considered as "hunting gear" as follows:

We would ask the board to clarify for Wildlife Troopers whether hay and grain to feed horses falls under the category of hunting "gear."

*The following request was addressed by the Board of Game in March 2020 and will not be considered at the 2021 Statewide Regulations Meeting:*

Align the Wood River CUA and Yanert Controlled Use Area closure dates.  
Amend 5AAC 92.540(H)(ii) to read:

*the area is closed to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game, from Aug. 1 – Sept. 30; however, this provision does not prohibit motorized access, or transportation of game, on the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption;*

**What is the issue you would like the board to address and why?** Yanert Controlled Use Area  
– No defined closure dates to motorized access.

When the Yanert Controlled Use Area (CUA) was instituted, unlike the Wood River and other CUAs that mandate a specific time frame for closure for certain types of motorized access, there was no specific closure dates to the Yanert CUA.

While there may have been reasons originally for making the Yanert CUA closed year-round to motorized access other than aircraft for hunting purposes, we can see no reason now to keep the area closed year-round to ATVs and snowmachines in terms of transporting hunters and their hunting gear, or hay and grain to feed horses at hunting camps with the CUA.

There is currently one moose hunt offered in Unit 20A Yanert CUA by harvest ticket for both residents and nonresidents and the season runs September 1 – September 25. There is one caribou hunt by draw permit DC827 with a season from August 10 – September 20. And there is a general season sheep hunt August 10 – September 20.

So why exactly is the Yanert CUA closed year-round for ATVs and snowmachines for the transportation of hunters and their hunting gear? The Alaska Wildlife Troopers interpret the Yanert CUA to be closed to motorized access other than aircraft year-round for the purpose of hunting or transportation of hunting gear. Some troopers also take the position that hay and grain used to feed horses is hunting “gear” and some residents have been prevented from transporting hay and grain into camps within the Yanert during the winter months by snowmachine. This is causing logistical/economic issues for those with camps within the Yanert CUA who wish to travel to their camps during the winter months via snowmachine or ATV and may be transporting hunting “gear”. We see no reason why anyone should not be allowed to transport hay and grain and tents and other hunting “gear” into the CUA during the winter months via snowmachine or ATV, and avoid the prohibitive cost of having to hire an air-taxi.

**PROPOSED BY:** Resident Hunters of Alaska (EG-F19-133)  
\*\*\*\*\*

## **PROPOSAL 104**

### **5 AAC 92.990. Definitions.**

Modify the definition of “deleterious exotic wildlife” with several housekeeping changes as follows:

(52) “deleterious exotic wildlife” means any starling (*Sturnus spp.*), [ENGLISH] house sparrow (*Passer domesticus*), or raccoon (*Procyon lotor*); any [NORWAY] brown rat (*Rattus norvegicus*), [ROCKDOVE] rock pigeon (*Columba livia*), or [BELGIAN HARE] European rabbit (*Oryctolagus cuniculus*) that is unconfined or unrestrained; and any feral ferret (*Mustela putorius furo*) or feral swine (*Sus scrofa*);

**What is the issue you would like the board to address and why?** The definition of “deleterious exotic wildlife” uses several archaic names that should be replaced by more common names. In some instances the archaic version limits the Board of Game’s intent and renders regulations that rely on the definition less understandable and enforceable.

The house sparrow (*Passer domesticus*) was once better known in North America as the English sparrow. However, the same species was known in central Asia and India as the Indian sparrow. The American Ornithologists’ Union (whose comprehensive checklist serve as the accepted authority for scientific nomenclature and English names of birds in the Americas) adopted the new common name in 1957.<sup>1</sup>

Norway rat is another name for the brown rat (*Rattus norvegicus*). Like the “English” sparrow, deleterious exotic species were often named for their presumed country of origin. Thus, the English named the brown rat the “Norway” rat. However, “Norway” rats are now believed to have originated in central Asia and possibly China.<sup>2</sup> Unlike birds, there is no single authority on common names for mammals. The Museum of Texas Tech University, which publishes a checklist of North American mammals similar to that compiled by the American Ornithologists’ Union, calls it the Norway or brown rat.<sup>3</sup> The American Society of Mammologists (perhaps more comparable to the American Ornithologists’ Union) calls it the brown rat.<sup>4</sup> The International Union for Conservation of Nature calls it the brown rat.<sup>5</sup>

The rock dove (*Columba livia*) is commonly known simply as a pigeon, but there are many pigeon species worldwide. The American Ornithologists’ Union renamed the rock dove the rock pigeon in 2003.<sup>6</sup>

The Belgian hare is a domesticated breed of the European rabbit that has been selectively bred to resemble a European hare.<sup>7</sup> This has been a misnomer in the list of deleterious exotic wildlife from the day it was adopted by the board. No introduced species of hare are found in Alaska. All of the deleterious exotic lagomorphs in Alaska are European rabbits. Some of the rabbits released into the wild may have been Belgian hares but that is only one of many breeds of European rabbit. Most of the feral rabbits in Alaska – on Middleton Island and in several urban areas including Anchorage – do not resemble Belgian hares. Thus, using the term Belgian hare instead of European rabbit misinterprets the original intent of the board and makes enforcement impossible.

Finally, because common names differ and can be easily changed, it is advisable to use scientific nomenclature in regulations such as this to minimize ambiguity and confusion.

<sup>1</sup> Avibase. 2019. House or Italian sparrow. <https://avibase.bsc-eoc.org/species.jsp?lang=EN&avibaseid=6D3BD126D55F8B69&sec=taxontable&version=aou>

<sup>2</sup> Wikipedia. 2019. Brown rat. [https://en.wikipedia.org/wiki/Brown\\_rat#cite\\_note-8](https://en.wikipedia.org/wiki/Brown_rat#cite_note-8)

<sup>3</sup> R.D. Bradley, L.K. Ammerman, R.J. Baker, L.C. Bradley, J.A. Cook, R.C. Dowler, C. Jones, D.J. Schmidly, F.B. Stangl, Jr., R.A. Van Den Bussche, and B. Würsig. 2014. Revised checklist of North American mammals north of Mexico, 2014. Occasional Paper No. 327. Natural Science Research Laboratory, Texas Tech University, Lubbock. <https://archive.org/details/revisedchecklis327brad/mode/2up>

<sup>4</sup> American Society of Mammalogists. 2019. Mammal species list search. <https://www.mammalogy.org/mammals-list>

<sup>5</sup> International Union for Conservation of Nature (IUCN). 2019. Brown rat: *Rattus norvegicus*. <https://www.iucnredlist.org/species/19353/22441833#taxonomy>

<sup>6</sup> Banks, R.C., C. Cicero, J.L. Dunn, A.W. Kratter, P.C. Rasmussen, J.V. Remsen, Jr., J.D. Rising, and D.F. Stotz. 2003. Forty-fourth supplement to the American Ornithologists' Union *Check-list of North American Birds*. The Auk 120:923-931. [https://www.biodiversitylibrary.org/content/part/AOU/AOU\\_checklist\\_suppl\\_44.pdf](https://www.biodiversitylibrary.org/content/part/AOU/AOU_checklist_suppl_44.pdf)

<sup>7</sup> Wikipedia. 2019. Belgian hare. [https://en.wikipedia.org/wiki/Belgian\\_Hare](https://en.wikipedia.org/wiki/Belgian_Hare)

**PROPOSED BY:** Rick Sinnott (EG-F20-030)  
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## **PROPOSAL 105**

### **5 AAC 92.990. Definitions.**

Add roof rat (*Rattus rattus*) and house mouse (*Mus musculus*) to the list of “deleterious exotic wildlife” as follows:

(52) “deleterious exotic wildlife” means any starling, English sparrow, or raccoon; any Norway rat, **roof rat (*Rattus rattus*)**, **house mouse (*Mus musculus*)**, rockdove or Belgian hare that is unconfined or unrestrained; and any feral ferret or feral swine;

**What is the issue you would like the board to address and why?** The ADF&G Division of Wildlife Conservation wrote “Wildlife and People at Risk: A Plan to Keep Rats Out of Alaska” in 2007.<sup>1</sup> The plan compiled a comprehensive list of international, federal, state and local agencies and entities that were expected to protect Alaska from invasive rodent species. The Board of Game was included; however, its role was not specified. In Table 3, under the categories of “Legal and Policy” and “Wildlife and Habitat Restoration” the Board’s role was described in question marks.

But the board has the legal authority to identify an invasive species as “deleterious exotic wildlife” and has done so for several species.

Both roof rats and house mice have become established in Alaska, although neither species is as widespread or destructive to human property or wildlife as brown (Norway) rats. Nevertheless, all three species – brown and roof rats and house mice – are considered species of concern by the plan,<sup>1</sup> and roof rats and house mice are considered two of the world’s 100 worst invasive species by the IUCN’s Invasive Species Specialist Group.<sup>2</sup> Adding the two species to the state’s list of “deleterious exotic wildlife” is a necessary step to fulfill the board’s role in protecting Alaska from invasive rodent species.

<sup>1</sup> Fritts, E. 2007. Wildlife and people at risk: a plan to keep rats out of Alaska. Division of Wildlife Conservation, Alaska Department of Fish and Game, Juneau. [https://www.adfg.alaska.gov/static/species/nonnative/invasive/pdfs/invasive\\_rodent\\_plan.pdf](https://www.adfg.alaska.gov/static/species/nonnative/invasive/pdfs/invasive_rodent_plan.pdf)

<sup>2</sup> Lowe, S., M. Browne, S. Boudjelas, and M. De Poorter. 2000. 100 of the world’s worst invasive alien species. Invasive Species Specialist Group, International Union for Conservation of Nature (IUCN). [http://www.issg.org/pdf/publications/worst\\_100/english\\_100\\_worst.pdf](http://www.issg.org/pdf/publications/worst_100/english_100_worst.pdf)

**PROPOSED BY:** Rick Sinnott (EG-F20-031)  
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## **PROPOSAL106**

### **5 AAC 92.990. Definitions.**

Provide a definition for “feral” as follows:

**“feral” means an ownerless and unconfined domestic animal, or the progeny of an ownerless and unconfined domestic animal, that no longer depends solely on food provided by humans to survive.**

**What is the issue you would like the board to address and why?** “Feral” is used in several regulations adopted by the Board of Game, including **[emphasis added in text]**:

5 AAC 92.990(a)(73) "nuisance wildlife" includes

(A) a **feral** domestic bird or mammal, deleterious exotic wildlife, unclassified game, small game, fur animals or furbearers, except wolf, wolverine, or lynx, or migratory bird for which there is a federal depredation order for this state under issued 50 CFR Sec. 21.43;

(B) an animal that invades a dwelling, cause property damage, or is an immediate threat to health, safety, or property;

...

5 AAC 92.990(a)(52) “deleterious exotic wildlife” means any starling, English sparrow, or raccoon; any Muridae rodent, rockdove or Belgian hare that is unconfined or unconstrained; and any **feral** ferret or **feral** swine.

...

5 AAC 92.029 Permit for possessing live game (d) Under this section, and in accordance with the definition of “game” in AS 16.05.940 (which includes **feral** domestic animals), a

(1) game animal defined as deleterious exotic wildlife or a nonindigenous gallinaceous bird is **feral** if the animal is not under direct control of an owner, including being confined in a cage or other physical structure, or being restrained on a leash; the commissioner may capture, destroy, or dispose of any **feral** deleterious exotic wildlife or **feral** nonindigenous gallinaceous bird in an appropriate manner.

Other than the definition of “feral” used for nonindigenous gallinaceous birds in 5 AAC 92.029(1), the term is not defined in regulation. Applying that definition (“not under direct control of an owner”) to other domestic animals is problematic because it could, for example, include a racing pigeon, unleashed family dog, or a horse that gets out of its enclosure.

At the other extreme, conventional wisdom and most dictionary definitions of “feral” seem to consider an animal to be feral only when it reverts to a wild state. But there is a spectrum of behavior that might be considered wild. A domestic animal that has gone feral is one that can and has survived in the wild on its own, at least for an extended period. It doesn’t necessarily have to become so wild that it avoids all human contact, the definition used by Anchorage Animal Control. Even wild animals seek out human contact and foods in some situations, and one reason why feral animals (like cats) cause problems is that they are capable of killing wildlife and spreading diseases while being subsidized by food and shelter provided by people.

It is also unclear what “feral domestic” means. Certainly, the offspring of an animal that was once domestic are also feral.

The definition I have proposed would provide a clear definition of “feral” and ensure that all formerly domestic animals, and their offspring, that no longer depend solely on food provided by humans to survive will fall under the definition of “nuisance wildlife.”

**PROPOSED BY:** Rick Sinnott

(EG-F20-034)

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## **PROPOSAL 107**

### **5 AAC 92.990. Definitions.**

Add unconfined and unrestrained domestic cats to the definition of “deleterious exotic wildlife” as follows:

(52) “deleterious exotic wildlife” means any starling, English sparrow, or raccoon; any **domestic cat (Felis catus)**, Norway rat, rockdove or Belgian hare that is unconfined or unrestrained; and any feral ferret or feral swine;

**What is the issue you would like the board to address and why?** None of the invasive species that the Board of Game (board) has previously identified as “deleterious exotic wildlife” are as deleterious as the unconfined or unrestrained domestic cat. Cats now outnumber dogs in North America, with the number of pet cats tripling in the past 40 years. U.S. households own an estimated 94 million cats, while the best estimates of abandoned, stray and feral (aka free-ranging) cats range from 70-100 million. Cats are now the most abundant terrestrial carnivore in North America.

In the most comprehensive meta-analysis of cat predation conducted to date, free-ranging and pet cats were estimated to kill 1.3 to 4 billion wild birds and 6.3 to 22.3 billion mammals annually in the contiguous United States.<sup>1</sup> A similar analysis estimated that cats kill 100-300 million wild birds annually in Canada, which has a much lower population of cats.<sup>2</sup> Using the same predation rates as the national study, an estimated 30,000 free-ranging and 74,600 pet cats are estimated to kill 1,148,000 birds and 5,975,000 mammals annually in the Municipality of Anchorage alone.<sup>3</sup>

These estimates are driven primarily by the high number of cats. The average pet cat probably kills less than a bird a month, but it adds up. Most of these prey items are native species, not deleterious exotics like house mice, rats or house sparrows. Cats kill more wild birds annually than windows, communication towers, vehicles, and pesticides combined.<sup>1</sup>

Cats are the sacred cows of America. Unlike dogs, in most jurisdictions pet cats don’t require licenses, leashes or constraints. The public (and most animal control agencies) seem to accept free-ranging cats, but not free-ranging dogs. For example, Alaska state law allows a person to shoot a dog that is harassing wildlife (under certain conditions), but not a cat.

Adding insult to injury, the board has classified some species of feral pets (including ferrets, European rabbits [erroneously listed as “Belgian hares”], pigeons, rats and mice) and other feral domestic animals (such as feral swine) as “deleterious exotic wildlife” or invasive species, but not feral cats.

Feral cats are considered to be one of the world’s 100 worst invasive species by the International Union for Conservation of Nature,<sup>4</sup> one of the 50 top invasive species in western states by the Western Governor’s Association (of which Alaska is a member state),<sup>5</sup> and a species with high invasive potential in Alaska by the University of Alaska’s Alaska Natural Heritage Program.<sup>6</sup>

Starlings, house (“English”) sparrows, rock (“doves”) pigeons, European rabbits (“Belgian hares”) and feral swine are included in the definition of deleterious exotic wildlife primarily because they compete with native species for food and other resources such as nest sites. They can also spread diseases to native species. Brown (“Norway”) rats, raccoons, and ferrets are included because they kill wildlife. But none of these species (with the possible exception of rats on Aleutian islands) compete with, kill, or spread diseases to Alaska’s wildlife to the extent that cats do.

Domestic species may not be released into the wild in Alaska (5 AAC 92.029). However, unlike most other domestic species, there seems to be little concern for free-ranging cats. Many owners don’t even try to confine them. Because they are far more regulated, dogs are seldom as problematic as cats.

A good example of the unquestioned, unique status of cats is the inclusion of ferrets as deleterious exotic wildlife in Alaska. Ferrets – because they are weasels domesticated as a hunting aid – are thought by some to pose a threat to wildlife if released into the wild. Two states, Hawaii and California, still prohibit owning ferrets as pets. Nevertheless, a summary of issues and options prepared for California noted that ferrets were less likely to be predators than prey, and would not survive more than about three days in the wild according to one source, although he stretched that estimate to a few weeks just to be safe.<sup>7</sup> Despite their fierce reputation, ferrets do not seem to pose a significant problem to native wildlife. A survey of multiple state and county officials from a wide array of natural and agricultural agencies found less than one sighting of a feral ferret per year, with no discernable impact on wildlife noted.<sup>8</sup> And yet cats, which kill billions of wild birds and mammals in North America (and millions in Alaska) annually, are not on the state’s list.

A similar comparison can be made with rats. An analysis of the cost of alien and invasive species in the U.S. conducted in 2005, when cat populations were approximately two-thirds as high as current estimates, calculated the annual value of wild birds killed by feral cats (i.e., not including those killed by pet cats) to be approximately \$17 billion, only slightly less than the economic cost of rats.<sup>9</sup> The analysis didn’t subtract the value of small mammals, amphibians and reptiles killed by cats. Nor did it factor in the human health impacts of toxoplasmosis and other cat-related diseases. The same analysis concluded that the economic cost of feral and pet dogs was \$620 million annually, including treatment of dog bites and human fatalities. When a careful, objective assessment concludes that cats pose a greater environmental threat than rats, you know we have a serious problem. Why aren’t cats on the state’s list of deleterious exotic wildlife?

The Board of Game appears to have a low threshold for “feral.” Swine, ferrets and non-indigenous gallinaceous birds (e.g., turkeys, chickens, pheasants) are considered feral “if the animal is not under direct control of the owner, including being confined in a cage or other physical structure, or being restrained on a leash” (5 AAC 92.029[d][1]). However, somewhat surprisingly, the much more abundant and problematic free-ranging domestic cats are not included on the state’s list of feral animals.

I considered adding only “feral cats” to the definition. Individual feral cats tend to kill more wild birds and mammals than stray or pet cats. However, almost all unconfined and unrestrained cats kill wild birds and mammals. The problem isn’t limited to feral cats; the problem is the growing number of cats, irresponsible owners, and the propensity of cats to hunt and kill even when they

are well fed. It is also extremely difficult for an enforcement officer to differentiate between a feral, stray, abandoned or any other free-ranging cat because many pet cats don't wear collars or tags. Not including all unconfined and unrestrained cats on the state's list of deleterious exotic wildlife makes a mockery of that list.

In a previous Board of Game meeting, some members expressed a concern that adding cats to the list of deleterious exotic wildlife would result in promiscuous shooting of pet cats. However, having a law on the books that allows any person to shoot a dog that is harassing big game doesn't seem to have resulted in a lot of pet dogs being shot by neighbors. Most people won't shoot a feral cat, but the risk of penalties or losing one's pet cat should instill a sense of responsibility in cat owners, as it does in dog owners.

<sup>1</sup> Loss, S.R., T. Will, and P.P. Marra. 2013. The impact of free-ranging domestic cats on wildlife in the United States. *Nature Communications* 4. <http://www.nature.com/articles/ncomms2380>

<sup>2</sup> Blancher, P. 2013. Estimated number of birds killed by house cats (*Felis catus*) in Canada. *Avian Conservation and Ecology* 8:3. <http://www.ace-eco.org/vol8/iss2/art3/>

<sup>3</sup> Sinnott, R. 2019. Animal control in Anchorage, Alaska: cats and dogs deserve equal treatment. Prepared for the Anchorage Animal Control Advisory Board and Anchorage Watershed and Natural Resources Advisory Commission, Anchorage, Alaska. 110 pp. <https://www.muni.org/Departments/OCPD/Planning/SiteAssets/Pages/WNRCReso-MinutesArchive/WNRC%20ltr%20to%20Animal%20Control%20Board%20w%20Report-12-20-2019%20rev.pdf>

<sup>4</sup> Lowe, S., M. Browne, S. Boudjelas, and M. De Poorter. 2000. 100 of the world's worst invasive alien species. Invasive Species Specialist Group, International Union for Conservation of Nature (IUCN). [http://www.issg.org/pdf/publications/worst\\_100/english\\_100\\_worst.pdf](http://www.issg.org/pdf/publications/worst_100/english_100_worst.pdf)

<sup>5</sup> Western Governors' Association. 2018. Top 50 invasive species in the West. [http://westgov.org/images/editor/WGA\\_Top\\_50\\_Invasive\\_Species.pdf](http://westgov.org/images/editor/WGA_Top_50_Invasive_Species.pdf)

<sup>6</sup> McClory, J., and T. Gotthardt. 2008. Non-native and invasive animals of Alaska: a comprehensive list and select species status reports. Final report. Alaska Natural Heritage Program, University of Alaska Anchorage, Anchorage, Alaska. 64 pp. [http://www.adfg.alaska.gov/static/species/nonnative/invasive/pdfs/invasivespp\\_report.pdf](http://www.adfg.alaska.gov/static/species/nonnative/invasive/pdfs/invasivespp_report.pdf)

<sup>7</sup> Umbach, K.W. 1997. Ferrets: a selective overview of issues and options. CRB Note 4(3):9 pp. California Research Bureau, California State Library. <http://www.legalizeferrets.org/wp-content/uploads/2016/03/CA-Research-Library-Article.pdf>

<sup>8</sup> Lepe, A., V. Kaplan, A. Arreaza, R. Szpanderfer, D. Bristol, and M.S. Sinclair. 2017. Environmental impact and relative invasiveness of free-roaming domestic carnivores – A North American survey of governmental agencies. *Animals* 7(10), 78. <http://www.mdpi.com/2076-2615/7/10/78/htm>

<sup>9</sup> Pimentel, D., R. Zuniga, and D. Morrison. 2005. Update on the environmental and economic costs associated with alien-invasive species in the United States. *Ecological Economics* 52:273-288. [https://www.forest-trends.org/wp-content/uploads/imported/pimentel-et-al\\_2005-update-on-envir-econ-costs-of-invasives-pdf.pdf](https://www.forest-trends.org/wp-content/uploads/imported/pimentel-et-al_2005-update-on-envir-econ-costs-of-invasives-pdf.pdf)

**PROPOSED BY:** Rick Sinnott

(EG-F20-032)

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# **Falconry**

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## **PROPOSAL 108**

### **5 AAC 92.037. Permits for falconry.**

Increase opportunity for nonresident take for certain eyas raptors for falconry as follows:

5 AAC 92.037 (g)(5)(7)(8). Taking, transporting, or possessing a raptor for falconry by a nonresident, conditions:

Alaska Falconers Association (AFA) is requesting that the Board of Game allow additional opportunity for nonresident falconers to take eyas Northern Goshawks statewide and eyas Peale's Peregrine Falcons from Units 1 - 4. AFA is submitting this proposal at the request of nonresident and Alaska resident falconers to allow additional nonresident opportunity to take these two species.

Current regulation, 5 AAC 92.037(g)(5), up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department;

Current regulation. 5 AAC 92.037(g)(7); "take is limited to one passage, hatching-year, raptor; "

Current regulation, 5 AAC 92.037(g)(8): The annual nonresident season for acquiring a passage raptor is from August 15 – October 31;

The new regulations would read:

5 AAC 92.037(g)(5), up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to five permits for taking, transporting, or possessing an eyas Northern Goshawk for falconry statewide, and up to five permits for taking, transporting, or possessing an eyas Peale's Peregrine Falcon, from Units 1-4, for falconry by a nonresident shall be issued annually by the department; applicants can only apply for one type of permit and must specify whether they are applying for a passage permit, an eyas Northern Goshawk permit, or an eyas Peale's Peregrine Falcon permit at the time of application.

5 AAC 92.037(g)(7): Take is limited to either one passage, hatching-year, raptor, one eyas Northern Goshawk statewide, or one eyas Peale's Peregrine Falcon from Units 1-4.

5AAC 92.037(g)(8): The annual nonresident season for acquiring a passage raptor is from August 15 – October 31; The annual nonresident season for acquiring an eyas Northern Goshawk statewide or an eyas Peale's Peregrine Falcon, (from Units 1-4), is from May 1 – July 20;

**What is the issue you would like the board to address and why?** Provide additional opportunity for nonresident falconers.

The AFA is asking the Board of Game to allow additional opportunity for nonresident falconers by allowing the take of certain eyas raptors. An eyas raptor is a bird that has hatched from the egg but has not fledged. At least one eyas raptor must be left in the nest per the current regulation pertaining to resident falconers. AFA requests that this regulation as it applies to resident falconers, also apply to nonresident falconers.

AFA is requesting that the Board of Game authorize “up to” five eyas Northern Goshawk permits statewide, and “up to five eyas Peale’s Peregrine Falcon permits from Units 1- 4, for nonresident falconers by drawing permit. Under 5 AAC 92.037(g)(8), the season dates for eyas Northern Goshawks, and eyas Peale’s Peregrine falcon take is recommended to be from May 1 - July 20. (These dates are based on published scientific data documenting average hatching dates and fledge dates for these two species across their range.)

Because of the concern for the wellbeing of Alaska’s Gyrfalcons and to eliminate any accidental take of eyas Gyrfalcons, Peale’s Peregrine Falcon take by permit would only apply to Units 1-4. According to both ADF&G and US Fish and Wildlife Service (USFWS) raptor biologists, there is a small possibility that there are gyrfalcon nesting sites in Units 1-4. Most importantly, days old or weeks old Gyrfalcon chicks are difficult to tell apart from like aged Peregrine falcon chicks, except by the most experienced biologists and falconers. By restricting Peale’s Peregrine eyas take to these units, we would significantly reduce the potential that a Gyrfalcon eyrie would be targeted by mistake.

Raptor biologists report that Northern Goshawks are considered to have a healthy and stable population statewide and Peale’s Peregrine falcons maintain a healthy, low density, population in Units 1-4.

Saint Lazaria Island located in Sitka Sound is designated a Wilderness area by the USFWS. This island supports a highly researched and viewed seabird nesting population. The required landowner permission required by regulation to take an eyas raptor would not be granted by the USFWS for Saint Lazaria Island. AFA would request that this Island be closed in regulation for the taking of eyas Peale’s peregrine falcons.

**PROPOSED BY:** Alaska Falconers Association (EG-F19-153)  
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## **PROPOSAL 109**

### **5 AAC 92.037(h). Permits for falconry.**

Modify the microchip requirements for live raptors exported from Alaska by nonresidents as follows:

Current regulation: 5 AAC 92.037(h) all live raptors exported from the state, including propagated birds, must be microchipped.

Proposed regulation: 5 AAC 92.037(h) all wild caught live gyrfalcons exported from the state by a nonresident must be microchipped and the microchip must be registered with an internationally recognized microchip registry such as (Petlink). Proof of microchip registration must be submitted to the department within 90 days after export. Failure to provide proof of registration to the department makes the individual ineligible to receive a future permit under 5 AAC 92.037(g).

**What is the issue you would like the board to address and why?** Microchip requirements for raptors exported from the State of Alaska.

Current regulations require that all raptors including propagated birds must have a microchip implanted prior to being exported from the State of Alaska. This regulation was enacted by the Board of Game at its last Statewide Regulations meeting dealing with “permits for falconry” issues as a result of a proposal submitted by the Alaska Falconers Association (AFA). The proposal language and intent and was significantly changed by the Board of Game (board) to be more inclusive. There was testimony presented to the board for the reasoning behind the request by AFA for the need to microchip large falcons that are taken under a nonresident capture permit and exported from the state.

The current regulation does not require that the microchip be entered into an international registry. AFA believes that this important requirement was overlooked at the time and is requesting a “house cleaning” measure to provide a means for tracking the microchip once it is deployed.

During deliberations, the board expanded the original intent of the proposal from, “microchip requirements for the export of large falcons (Peregrine falcons and Gyrfalcons) taken by nonresident permit holders, to all raptors exported from the state by both nonresident and resident falconers. This expansion also included raptors exported by breeders under a propagation permit.

The current regulation is overburdensome and should be amended to only include the highly valuable wild caught Gyrfalcons exported from the state by a nonresident under a permit issued by the department. Alaska raptors that are commonly used for falconry (except Gyrfalcons) are readily available to falconers in the continental United States, and propagation birds are highly regulated under the federal system, AFA feels that the board should remove all species of raptors from the microchip requirement except wild caught Gyrfalcons exported by a non-resident under this section.

AFA is also requesting that the microchip be registered with an internationally recognized microchip registry such as “Petlink” within 90 days of the take of the Gyrfalcon. Failure to provide proof of registration to the department within the time frame listed above will make the permit holder ineligible to apply for a future permit under this section.

Since the inception of the nonresident capture permit regulation in 2014 which allowed up to five permits for passage raptors, ADF&G issued three permits per year for the first three years and five permits per year for the last two years. Nonresidents have taken a total of eleven birds under this program. Ten Gyrfalcons and one Northern Goshawk have been captured and exported from the State of Alaska. In the past two years since the inception of the current regulation, six exported birds (all Gyrfalcons) have been microchipped. Gyrfalcons are still the bird of choice for both falconers and breeders who participate in the nonresident take program. Gyrfalcons continue to have a stable low density population in Alaska. Gyrfalcons are highly valued raptors and due diligence would dictate that wild birds that are taken from Alaska should be protected in a way that helps maintain the bird in its wild status. Microchipping this species aides significantly in this protection. Current regulation dictates that a wild caught raptor is always wild and can never be legally sold.

If a microchipped wild Alaska sourced bird is recovered, it will provide a valuable tool for law enforcement for their investigative efforts. If an Alaska sourced bird is lost or stolen, the microchip would be an invaluable tool in returning the recovered bird to its owner.

In the exotic bird industry, valuable species such as parrots, macaws, cockatoos, toucans and mynahs are microchipped to prove ownership and stem illegal trade. These birds are chipped by breeders and when acquired from the wild. Gyrfalcons are the same size or in many cases larger and more robust than most of these species of exotic birds.

AFA also considered the possibility of requiring a DNA test instead of the microchip. Although this test would conclusively prove identity of an individual bird, this option was put aside, because there is no central registry for DNA sampling and if a bird was recovered by law enforcement or was lost and recovered by a non-owner, the bird and owner could not be readily identified.

**PROPOSED BY:** Alaska Falconers Association (EG-F20-003)  
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## **PROPOSAL 110**

### **5 AAC 92.037. Permits for falconry.**

Extend the nonresident season for acquiring passage raptors as follows:

This proposal seeks to modify the nonresident season for acquiring a passage raptor as follows:

5 AAC 92.037(g)(8). Permits for falconry.

Current regulation: The annual nonresident season for acquiring a passage raptor is from August 15th to October 31st

Proposed regulation: The annual nonresident season for acquiring a passage raptor is from September 15 to November 15.

**What is the issue you would like the board to address and why?** Change the season dates for nonresident falconers to take passage raptors by permit.

The Alaska Falconers Association (AFA) proposes to change the nonresident season dates to acquire a passage raptor to better align the time of taking with the dispersal timing of Gyrfalcons from their natal areas, and to reduce the disturbance of nesting sites especially those nest sites located north and west of the Brooks Range.

This proposal is requesting the same season date changes that the Department of Fish and Game (ADF&G) recommends in their proposal to the Board of Game on this subject.

The nonresident season dates were established in 2015 to provide opportunity to take all legal falconry species after they leave their natal area (i.e. passage bird), including smaller species that disperse in August. ADF&G records show that to date, ten Gyrfalcons and one Northern Goshawk have been taken by nonresident falconers. There appears to be little interest in taking other legal passage falconry species by nonresidents since most of those species are available in the continental United States. Further, individuals of all legal falconry species either remain in Alaska year long or remain in Alaska through mid-September and would remain available for nonresident falconers even with the change in season dates.

The following information that has been compiled by ADF&G represents data published by Gyrfalcon researchers:

Gyrfalcons depart their natal area in Alaska in early September (median=27 August, range 15 August – 6 September., n=20, Seward Peninsula and Denali National Park, McIntyre et al. 2009; median=12 September, n=2, Yukon Kuskokwim Delta; Eisaguirre et al. 2014). Current nonresident season dates allow recently fledged young that have not yet left their natal areas to be taken for approximately three weeks.

This is a conservation concern because there is substantial legal and illegal interest in obtaining white Gyrfalcon nestlings. These birds are extremely valuable through legal captive breeding and illegal falconry trades. Having a passage season for nonresident falconers that allows take at or near Gyrfalcon nests incentivizes the sharing of sensitive nest site locations as well as the disturbance of these birds during a sensitive time in their life cycle. Further, most of this attention is focused on white birds that constitute less than 10% Alaska's Gyrfalcon population and hence, taking a conservative approach to season dates is appropriate for such a small population of birds (n < 100) to ensure sustained yield into the future.

In addition, this proposal asks the Board of Game to extend the season dates later by fifteen days to allow additional opportunity for nonresident falconers to access transient passage Gyrfalcons migrating through road accessible areas of Western Alaska.

**PROPOSED BY:** Alaska Falconers Association (EG-F20-024)  
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## **PROPOSAL 111**

### **5 AAC 92.037. Permits for falconry.**

Limit nonresident take of raptors to one bird every four years and limit unsuccessful permittees from applying the following year as follows:

Proposed regulation: 5 AAC 92.037(g)(5). Up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department. If a permittee successfully takes a raptor, that person would be ineligible to take another raptor for four calendar years.

If an applicant draws a nonresident capture permit, that applicant, if unsuccessful, will be ineligible to apply for a nonresident capture permit the following year.

**What is the issue you would like the board to address and why?** 5 AAC 92.037(g)(5). Up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department:

This proposal requests that the Board of Game (board) place a limit on raptors to allow a take of one raptor every four years by a nonresident. This request will prevent a falconer who successfully takes a raptor from applying for another permit for four years.

The proposer also requests that the board require that: “if an applicant draws a nonresident capture permit, that applicant, if unsuccessful, will be ineligible to apply for a nonresident capture permit the following year. This language is currently applicable for all other big game drawing permits the state administers.

Gyrfalcons in Alaska maintain a low-density population. Two published studies estimate 300 to 500 breeding pairs statewide. Gyrfalcons have been targeted almost 100 percent of the time by nonresident falconers and since the inception of the nonresident permit system in 2014, ten gyrfalcons and one northern goshawk have been taken by nonresident falconers during the first five years of the program. Two specific individuals have drawn two permits and have taken two Gyrfalcons in five years, and one individual has drawn three permits and has taken 3 raptors which include two gyrfalcons and one northern goshawk in five years. The chance of an applicant drawing a nonresident capture permit is about 1 in 5. Alaska Falconers Association (AFA) has had numerous contacts with unsuccessful applicants asking that the State implement a system that limits successful applicants to one gyrfalcons every four years. Gyrfalcons are highly sought after birds by both breeders and falconers alike. The “one in four” management method is used in several areas by department managers when there is a reason to create opportunity for as many applicants as possible

The Board of Game’s stated intent when nonresident take was implemented in 2014, was to give the nonresident falconer an opportunity to capture a raptor from a species that does not normally occur in the continental United States, and use that raptor as a falconry bird.

Up to five permits for passage, hatch year raptors will still be issued by the department. This proposed request from AFA will spread out the available opportunity, allowing different nonresident falconers an opportunity take a raptor from Alaska.

**PROPOSED BY:** Alaska Falconers Association (EG-F20-039)

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## **PROPOSAL 112**

### **5 AAC 92.037. Permits for falconry.**

Increase nonresident opportunity for acquiring raptors as follows:

5 AAC 92.037 (g)(5) up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department to

Nonresident take permits for raptors shall have the same quotas as resident take

(7) take is limited to one passage, hatching-year raptor; to take is limited to two raptors either eyas or passage, hatching- year-raptors;

Include all raptors in section (f) for nonresidents.

**What is the issue you would like the board to address and why?** This proposal is a request to modify existing Alaska provisions regulating nonresident harvest of raptors in order to ensure reasonable access to a healthy resource and provide equal opportunity for all interested parties. We

anticipate the following will fulfill falconry demand for the foreseeable future while remaining well below sustainable harvest numbers consistent with scientifically sound principles:

Adopt the same raptor take season for nonresidents as has been adopted for Alaska residents.

Allow nonresidents to take eyas as well as passage birds of all other falconry raptors with no quotas. Eyas harvest improves the survival of the eyas itself as well as the siblings.

Harvest limit of two birds, depending on the falconer's ability to take two raptors during the previous 12-month period. This is currently the federal and state law. Birds with quotas should be limited to one tag per applicant, after the draw period is over any unissued tags should be available at the counter on a first come first serve basis.

Peregrine harvest would be 20-30 nestling ("eyas") or juvenile ("passage," i.e., first year immature birds) peregrine falcons. This is based on the recommended harvest of peregrines by the US Fish and Wildlife Service (USFWS) environmental assessment (EA) 2008 in Alaska of 41 birds.

Nonresident Gyro falcon harvest should be based on the same rules for resident harvest. There is only one place in the United States for a falconer to harvest a Gyro falcon eyas, and that is Alaska. This resource should be available to any falconer who is a United States citizen.

Arguably the most desirable falcon for nonresident take is the peregrine falcon. Alaska populations have always been robust and since the anatum subspecies was removed from the endangered species list in 1999 it is considered fully recovered beyond all expectations throughout the U.S. As a result the USFWS conducted an EA in 2008 on the take of peregrine falcons for use in falconry. Based on this EA, the USFWS originally limited the take of the EA published a very conservative allocation of take of peregrines in 2009 through 2017 of 36 passage peregrine falcons anywhere in the United States east of 100 degrees West longitude. See 73 FR 74508, December 8, 2008. The USFWS based this figure on a management strategy "[w]hich incorporated three important safeguards to ensure against negative impacts from authorized falconry take on peregrine falcons across their range." The same EA, which was agreed to by the states, allows for the harvest of 41 in Alaska of which only a small percentage are harvested each year. The USFWS has since published updated findings and regulations which increased the take limit for passage peregrines by five (5) times, to 144 peregrine falcons, based on new available evidence of the actual robust peregrine breeding populations in Alaska, Canada, and lower 48 states. See Vol. 82, No. 174 FR 42700, September 11, 2017.

In order to provide maximum opportunity for both resident and nonresident falconers we propose a minimum of 25 nonresident permits plus the following method of selection for the distribution of additional permits that are unwanted by resident falconers:

Multiply by two the average quantity annually harvested by resident falconers over the prior three years. Deduct the three-year average from the allowable harvest of 41 and this would be the number of additional permits available to nonresident falconers.

The proposed nonresident take level for peregrines is a very conservative number and the harvest of this quantity is far below any measurable amount. The other more desirable raptor is the gyrfalcon which has never been endangered or threatened and is plentiful in Alaska, thus we

believe no quota is necessary. Should a quota be required on the gyrfalcon for nonresident harvest we believe that 40 would be sufficient to satisfy the demand given the limited number of licensed falconers in the lower 48.

Historically, in 2011 the American Falconry Conservancy (“AFC”) drafted a proposal (P40) with the assistance of several Alaska falconers to allow nonresident take of raptors, and we submitted the proposal to the Alaska Board of Game (BOG). During the 2012 statewide meetings cycle, BOG received a substantial amount of testimony and comment on the proposal. The science- and legal based testimony reasoned that the Alaska raptor resource was healthy, and that there was no justification for not allowing nonresident take of raptors. Testimony included Alaska Department of Fish and Game (ADF&G) summaries of raptor numbers, the manner in which USFWS derived their conservative 5% take levels, the support of both resident and nonresident falconers, the concerns of a few Alaska resident falconers, and discussions on all of the concerns. At the January 2012 meetings, the BOG decided to defer their decision on P40 until the 2014 cycle.

During the 2014 cycle, the BOG resumed their discussions on nonresident take of raptors (P40 renumbered P174) and adopted ultra conservative provisions. The BOG allowed for the issuance of five nonresident take permits annually and placed a tight restriction on the take season, especially for peregrines. Federally, Alaska peregrines may only be taken as juveniles during a season that ends on September 31, and the Alaska provisions do not allow nonresidents to take peregrines until September 15. This allows nonresidents only a two-week window to harvest peregrines.

Additionally, despite ADF&G’s recommendation to allow seven nonresident permits annually, including eyases (See P174 A (RC72) of the March 2014 board meetings), and the BOG’s decision to allow five nonresident permits, ADF&G limited their permit issuance to only three in 2014. It was noted by ADF&G that their original seven permit recommended limit was based on a percentage of what Alaska resident falconers harvest, not on resource sustainability.

During the 2016 cycle, the BOG declined to approve a proposal to modify the nonresident permit regulations citing a preference to wait until the next review cycle. Subsequent to this cycle, the ADF&G did opt to allow issuance of the five permits authorized by the BOG.

The following documents are applicable to this proposal and are incorporated by reference:

1. AFC Written Testimony at January 2012 BOG Meetings (RC22).
2. ADF&G Presentation on Falconry at January 2012 BOG Meetings (RC24).
3. ADF&G Proposal 40 Presentation at January 2012 BOG Meetings (RC62).
4. ADF&G Presentation on Proposal 40 and Alaska Raptor Populations at January 2012 BOG Meetings (RC125 & RC126).
5. ADF&G Preliminary Recommendations on Proposals for January 2012 BOG Meetings.
6. December 29, 2011 Memorandum from AAG, Kevin Saxby to BOG.
7. Kodiak AC Comments on Proposals at January 2012 BOG Meetings (AC27)

8. February 17, 2012 Letter from AFC to BOG, Follow-up to January 2012 BOG Meetings.
9. ADF&G Proposal 174 A at March 2014 AKBOG Meetings (RC72).
10. Kodiak AC Comments on Proposals at March 2014 BOG Meetings (AC13
11. March 24, 2014 Letter from AFC to BOG re March 2014 Meeting Decision on Non-resident Take of Raptors.
12. April 24, 2015 Letter from AFC to BOG re Proposal to increase the allowable harvest of raptors by nonresident falconers
13. Final Revised Environmental Assessment, Management Plan, and Implementation Guidance: Take of Nestling American Peregrine Falcons in the Contiguous United States and Alaska for Use in Falconry, USFWS, March 2004.
14. Final Environmental Assessment: Take of Raptors From the Wild Under the Falconry and the Raptor Propagation Regulations, USFWS, June 2007.o
15. Final Environmental Assessment and Management Plan: Take of Migrant Peregrine Falcons From the Wild For Use in Falconry, and Reallocation of Nestling/Fledgling Take, USFWS, August 2008.
16. Migratory Birds; Take of Peregrine Falcons for Use in Falconry. Vol. 82, No. 174 FR 42700, September 11, 2017.

AFC thanks the Alaska Board of Game for their consideration and we continue to offer our assistance in this important matter.

**PROPOSED BY:** American Falconry Conservancy (EG-F20-040)  
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## **PROPOSAL 113**

### **5 AAC 92.037. Permits for falconry.**

Modify the regulations for nonresident take of raptors for falconry including increased number of nonresidents permits and expansion of the season to year-around as follows:

This proposal would amend the current regulations on nonresident raptor take for falconry in *Sections 37 (g) (1) (5) (7) (8)* as follows:

- Section 37 (g) (1) - Clear up ambiguous language about what ‘permit’ is necessary for take.
- Section 37 (g) (5) - Delete current language. Add specific language allowing an annual maximum of five permits for a gyrfalcon, five permits for a peregrine falcon and five permits for any other legally authorized raptor. This totals to a maximum annual number of permits of 15.

- Section 37 (g) (7) - Delete current language restricting take to only passage raptors. This allows take of either eyas or passage raptors as per the Alaska Falconry Manual Part 34 - Taking of Raptors “An eyas or passage bird may be taken any day of the year.”

- Section 37 (g) (8) - Delete current language entirely which defines a ‘season’ for passage raptor take. This allows take of raptors any day of the year as per the Alaska Falconry Manual Part 34 - Taking of Raptors “An eyas or passage bird may be taken any day of the year.”

The draft regulatory language is as follows:

(g) The taking, transporting, or possessing a raptor for falconry by a nonresident is allowed under the following conditions:

(1) **a valid, current falconry permit from the nonresident’s home state** and a valid, current nonresident hunting license is required for submitting an application, taking, transporting, possessing, and transferring a raptor to another state’s falconry program;

(2) the nontransferable permit will be issued under standards, procedures and conditions set out in the Alaska Falconry Manual No. 10, dated July 1, 2018; that manual, including its conditions related to nonresident take, is hereby adopted by reference;

(3) take is limited to nonresidents who are citizens of the United States;

(4) only the raptor species listed under (f) of this section are eligible for nonresident take;

(5) **the department shall issue annually: up to 5 permits for a gyrfalcon (Falco rusticolus); up to 5 permits for a peregrine falcon (Falco peregrinus); and up to 5 permits for any other raptor species listed under (f) of this section** [UP TO FIVE PERMITS FOR TAKING, TRANSPORTING, OR POSSESSING A RAPTOR FOR FALCONRY BY A NONRESIDENT SHALL BE ISSUED ANNUALLY BY THE DEPARTMENT];

(6) a targeted hunt system will be used to determine permit winners if the number of applicants exceeds the number of permits available;

(7) take is limited to one [PASSAGE, HATCHING-YEAR] raptor;

[(8) THE ANNUAL NONRESIDENT SEASON FOR ACQUIRING A PASSAGE RAPTOR IS FROM AUGUST 15 - OCTOBER 31];

**What is the issue you would like the board to address and why? 5 AAC 92.037. Permits for falconry.**

Remove unnecessarily restrictive and complicated regulations on nonresident raptor take for falconry. Increase the number of nonresident permits from five to 15.

The issue with the current regulations is that nonresident raptor take for falconry is unnecessarily restrictive and complicated.

Currently, Section 37 (g) has the following nonresident limitations:

- Section 37 (g) (5) limits nonresident permits to 5 for any of the 25 possible indigenous raptor species allowed for take in section 37 (f).
- Section 37 (g) (7) limits take to one passage, hatching-year raptor. A 'passage' raptor being one that has fledged and is surviving on its own.
- Section 37 (g) (8) sets a nonresident 'season' for acquiring a passage raptor from August 15 - October 31.

Section 37 (a) makes clear that a nonresident permit is to be issued under the following conditions:

"The permit will be issued under standards, procedures, and conditions set out in the Falconry Standards section of the Alaska Falconry Manual No. 10, dated July 1, 2018; that section of the falconry manual is hereby adopted by reference."

The following conditions for resident falconry take come from the Alaska Falconry Manual, Alaska Falconry Standards Section, Part 34 - Taking of Raptors:

- Only an individual with a valid, **current Alaska falconry permit or non-resident take permit** and a valid, current Alaska hunting license, excluding temporary permits, may take a raptor from the wild in Alaska.
- Take of any raptor species must be in compliance with these standards.
- **An eyas or passage bird may be taken any day of the year.**
- Except for American kestrel, great horned owl, and subadult golden eagle, a raptor over one year of age may not be taken.
- An actively breeding bird, including one in immature plumage, may not be taken.
- An eyas may be taken only by a general or master class falconer; at least one eyas must be left in the nest or eyrie from which a bird is removed.
- A permittee may not intentionally capture a raptor of a species not allowed by his or her classification for possession for falconry.
- A permittee unintentionally or otherwise capturing a raptor not allowed must release it immediately.

This proposal will amend and eliminate unnecessarily restrictive and complicated regulations by simply **defaulting the nonresident take conditions to those of all resident falconers** as currently outlined in the Alaska Falconry Manual.

Under the new proposed regulations:

- a nonresident falconer would be able to take a raptor under the exact same standards, procedures, and conditions as a resident falconer. This allows that an eyas or passage bird may be taken any day of the year.
- the maximum annual number of permits would be increased from 5 to 15.
- to better manage the take of the gyrfalcon and the peregrine falcon, the permits would be allocated in 3 separate groups – 5 permits for a gyrfalcon, 5 permits for a peregrine falcon and 5 permits for any other legally authorized raptor.

The benefits of these proposed regulations include:

- An increased chance of obtaining a permit for the raptor of one's choice.
- The full year opportunity for planning and making a trip to Alaska for capture.
- Access for capture of passage raptors during times of the year that is not life-threatening to the permittee.
- Access to eyas raptors. An 'eyas' raptor is one that is not fully grown or very recently fully grown. The benefits of eyas take include:
  - Being able to raise and train a bird that is very tame and tractable.
  - Gives falconers who would like to breed their bird at some future point a much higher chance of success.
  - Improves the future gene pool for a species by having wild taken birds that will have a more likely chance of successful captive reproduction.
  - Enlarges the population of genetically fit breeding birds in case environmental problems reduce wild populations. Point in fact, the recovery of the peregrine falcon, which exemplifies one of our greatest wildlife achievements in bringing a species back from near extinction due to our own fault of indiscriminate pesticide use (U.S. Fish and Wildlife Service, 2003).
- Reduced bureaucracy for nonresidents
- Reduced bureaucracy for enforcement

### **Biologic Support for this Proposal**

Although this proposal includes the nonresident take possibility of any of the legally listed 25 indigenous raptors, three raptors stand out in capability and excitement of hunting prowess for use in falconry. These three species generally have a high research interest for wildlife management as well.

These three species are the Gyrfalcon (*Falco rusticolus*), the Peregrine falcon (*Falco peregrinus*) and the Northern Goshawk (*Accipiter gentilis*).

This proposal will include a limited research reference list; however, if necessary, more can be added during the comment period as appropriate.

Falconry is legal in all states except Hawaii. The wildlife management teams of these states all support falconry and raptor take as harvest data allows for their state. This also includes nonresident take for each state.

According to Millsap and Allen (2010), falconry raptor take poses little threat to wild populations in general. Natural mortality as well as mortality due to humans, either directly (e.g. shooting, vehicles, fences, poisoning) or indirectly (e.g. habitat loss), far exceed loss due to regulated falconry take.

In 2014 the Board of Game amended Alaska's falconry regulation [5 AAC 92.037(g)] to allow capture and export of falconry raptors by nonresident falconers under a permit issued by the Department of Fish and Game, Division of Wildlife Conservation (DWC).

In general, the DWC research data supports the limited take of these 3 raptors.

The fact that the DWC has allowed the take of the 25 indigenous species in AAC 92.037 37 (f), which includes these three species, gives evidence to the biologic basis for the take.

Research by Bente and Booms (2007 – 2014) shows the Alaska populations of gyrfalcons and peregrines fluctuate over time as do all species, but have remained at relatively stable levels. This is evidence that a falconry harvest is possible without negatively affecting wild populations.

The small increase in take of up to 15 permits is statistically an insignificant percentage for the populations of the entire state of Alaska. If the nonresident take of up to 15 birds, or areas where they are taken from, is of concern to wildlife management, this would imply that it would be of concern for resident take as well.

For a few nonresident permits, it makes sense to simply consider these takes as part of the overall Alaskan take with the exact same conditions of take applied for nonresidents as residents.

Whether a raptor is taken as a passage or an eyas, and whether taken in June or August, ultimately this ends as a take from the resource either way. With falconry take, however, there is the possibility of multiplying the take species through captive breeding which is not possible with a take from hunting.

### **Alaska Nonresident Take Data**

The following table shows the results of nonresident falconry take over the years from 2015 to 2020. The nonresident take program began in 2015.

Year	Max Permits	Number of Applicants	Birds Exported
2015	3	23	2 gyrfalcons
2016	3	24	1 gyrfalcon, 1 goshawk
2017	3	18	1 gyrfalcon
2018	5	24	3 gyrfalcons
2019	5	26	3 gyrfalcons
2020	5	17	TBD
<b>Source: Alaska Department of Fish and Game Website – Nonresident Falconry Take Permit Application Results, 2020</b>			

Statistics from this nonresident take data show:

- Total number of applicants = 115 (132 incl. 2020)
- Total number of permits given = 19 (24 incl. 2020)
- Total number of birds taken = 11
- Ave number of birds taken/year = 2.2

This is evidence that reaching the maximum allowed take is difficult for nonresidents to achieve. This evidence also supports that the impact of nonresident wild take is extremely low.

### **Fiscal Impact of nonresident take**

The Dept of Fish and Game application process requires that a nonresident hunting license be purchased **before** applying – “Once you have acquired an Alaska hunting license, complete and submit the on-line application.”

This produces a revenue stream beyond the number of actual permits given. The current fee for a nonresident annual hunting license is \$160.

The department’s hunting license fee income since opening nonresident take in 2015 with 132 applicants is \$21,120. This is an average of \$3,520 per year for hunting licenses only.

Many permittees will also purchase a 1 to 14 day sport fishing license as well for their trip adding further revenue for the department.

Nonresident permittees also contribute revenue to the local community. Fifteen nonresident permittees with accompanying travelers for products and services such as Alaska Airlines flights, rental vehicles and gas, food, lodging, equipment and supplies, plane services, and guide services all supports the Alaskan economy.

## **Conservation Resource**

International Union for Conservation of Nature (IUCN)

Established in 1964, The International Union for Conservation of Nature's Red List of Threatened Species is the world's most comprehensive information source on the global conservation status of animal, fungi and plant species.

### **Gyr Falcon Conservation Data**

Scientific name: *Falco rusticolus*

Conservation Status:

IUCN Red List of Threatened Species: Least Concern (Population stable)

See Bente and Booms (2014) for more research on the population status of peregrines and gyrfalcons in Alaska.

See Wright (2004) for more research on the status of peregrines and gyrfalcons in Alaska.

### **Peregrine Conservation Data**

Scientific name: *Falco peregrinus*

Conservation Status:

IUCN Red List of Threatened Species: Least Concern (Population stable)

See Wright (2004) for more research on the status of peregrines and gyrfalcons in Alaska.

### **Northern Goshawk Conservation Data**

Scientific name: *Accipiter gentilis*

Conservation Status:

IUCN Red List of Threatened Species: Least Concern (Population stable)

See Flatten (2001) and Iverson (1996) for more research on the status of the northern goshawk in Alaska.

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**PROPOSED BY:** The California Hawking Club (EG-F20-169)  
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## **PROPOSAL 114**

### **5 AAC 92.037. Permits for falconry.**

Change the nonresident season for acquiring a passage raptor as follows:

This proposal seeks to modify the nonresident season for acquiring a passage raptor as follows:

5 AAC 92.037(g)(8). Permits for falconry

The annual nonresident season for acquiring a passage raptor is from **September 15 – November 15** [AUGUST 15 – OCTOBER 31];

**What is the issue you would like the board to address and why?** The Department proposes to change the season dates to ensure take of Gyrfalcons by nonresident falconers occurs away from the birds' natal areas as was originally intended with the creation of the nonresident passage falconry season.

Gyrfalcons depart their natal areas in Alaska between approximately August 15 and September 12 (McIntyre et al. 2009, Eisaguirre et al. 2014). The current nonresident season beginning on August 15 allows recently fledged Gyrfalcons that have not yet left their natal areas to be taken by nonresidents near nests. This is a conservation concern because it incentivizes the sharing of sensitive nest site locations which are used repeatedly over centuries. It also encourages disturbance of cliff-nesting species by nonresident falconers scouting prior to the season opening when chicks are more vulnerable to disturbance. This concern is exacerbated for Gyrfalcons because there is substantial interest in obtaining financially valuable white Gyrfalcon nestlings for both legal and illegal purposes. White Gyrfalcons constitute less than 10% of Alaska's Gyrfalcon population. It is therefore particularly important that season dates protect this small population of

birds ( $n < 150$ ) while near their nests to ensure sustained yield into the future for both resident and nonresident falconers.

The nonresident season dates were established in 2015 to provide opportunity to take all legal falconry species after they leave their natal area (i.e. passage bird). To date, 10 Gyrfalcons and 1 Northern Goshawk have been taken by nonresident falconers. Little interest has been shown by nonresident falconers in taking other passage falconry species as most are available in other states. Further, the peak of migration for most falconry species occurs in mid-September in Interior Alaska (McIntyre and Ambrose 1998), with peaks in Southcentral and Southeast likely similar or slightly later. The proposed date change would align the opening of the season with the peak availability of passage raptors, ensuring all falconry species remain available for harvest during the proposed season.

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

(HQ-F20-055)

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# **Hunter Education**

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## **PROPOSAL 115**

### **5 AAC 92.003. Hunter education and orientation requirements.**

Remove the hunter education requirement for beneficiaries using proxy hunters as follows:

### **5 AAC 92.003. Hunter education and orientation requirements.**

...(a) Beginning August 1, 2002, 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;

**(A) except that no hunter education requirements apply to persons that are the beneficiaries of proxy hunters**

**What is the issue you would like the board to address and why?** To close an inadvertent issue with the proxy system. For an individual to be proxy hunted for after they turn 18, they must pass a hunter education course, which is not always possible.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (EG-F20-059)

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## **PROPOSAL 116**

### **5 AAC 92.003. Hunter education and orientation requirements.**

Remove the crossbow certification requirement for people born before January 1, 1986 as follows:

Amend 5 AAC 92.003(l) to include the “born before or on January 1, 1986 exception to the use of crossbows”. That educational requirement exception is already available to “users of longbows, recurve bows, or compound bow for hunting big game under 5 AAC 92.003(k).

**What is the issue you would like the board to address and why?** Equality in hunting methods educational requirements.

**PROPOSED BY:** Alaska Outdoor Council (EG-F20-134)

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## **PROPOSAL 117**

### **5 AAC 92.003. Hunter education and orientation requirements.**

### **5 AAC 92.012 (b). Licenses and tags.**

Require hunters to possess proof of completion of required educational certifications in the field as follows:

1.Under 5 AAC 92.003 (create a new section N):

When participating in a hunt that requires a department approved hunter education or orientation course under 5 AAC 92.003, a person must have in possession proof of course completion.

2. Under 5 AAC 92.012 (b): Upon request from an employee of the department or a peace officer of the state, a person may not refuse to present for inspection any license, harvest ticket, permit, tag, or ~~bowhunter certification card~~ proof of completion of a course required under 5 AAC 92.003 and 5 AAC 92.085, any game, or any apparatus designed to be, and capable of being, used to take game.

**What is the issue you would like the board to address and why?** The Alaska Wildlife Troopers, while in the field, frequently contact hunters participating in hunting that have an educational or orientation requirement. At times, these hunters are not carrying proof they have completed the course/certification. Currently, there is no requirement to require possession in the field of proof of completion. By passing this proposal, it will give Alaska Wildlife Troopers immediate knowledge if the hunter completed the required course, rather than having to spend significant time after the fact, researching and confirming the required course was completed by the hunter.

**PROPOSED BY:** Alaska Wildlife Troopers (HQ-F20-017)  
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### **PROPOSAL 118**

#### **5 AAC 92.050. Required permit hunt conditions and procedures.**

Add a new paragraph requiring completion of crossbow hunter certification course at time of permit application as follows:

5 AAC 92.050(a) The following conditions and procedures for permit issuance apply to each permit hunt:

...

**(11) an applicant for a certified crossbow hunter only permit hunt must successfully complete a department-approved crossbow hunter certification course before submitting a permit application.**

**What is the issue you would like the board to address and why?** The Board of Game recently added crossbows as an allowed method of harvesting game in some drawing permit hunts. This regulatory change now makes crossbows the only restricted method that does not require the applicant to be certified at the time of application. By requiring applicants to be certified before submitting an application for a drawing permit this newest form of weapons restriction certification will be aligned with the existing application requirements for other weapons-restricted hunts.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-058)  
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## **Proxy Hunting**

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*The Board of Game deferred this proposal from the Western Arctic / Western Region meeting in January 2020, as amended to apply to muskox hunts in all units. It was previously numbered as Proposal 30.*

### **PROPOSAL 119**

#### **5 AAC 92.011(k). Taking of game by proxy.**

Include muskox on the list of species that can be taken under a proxy permit as follows:

Add language to 5 AAC 92.011(k) Proxy hunting under this section is only allowed for

- (1) caribou;
- (2) deer;
- (3) moose in Tier I hunts, any-bull hunts, and antlerless moose hunts; [AND]
- (4) emperor geese; **and**
- (5) **Muskoxen in Tier II hunts.**

**What is the issue you would like the board to address and why?** This proposal seeks to allow proxy hunting in Tier II muskoxen hunts in Unit 22B through 22E. The trophy value is destroyed in the field subject to permit conditions. These hunts are allowed for the harvest of meat, horn, and fiber by Alaskan residents. These products are distributed throughout the community and because the harvest rate is high there is rarely excess permits about the harvestable surplus. Families/communities have missed opportunities for harvest when the permit holder becomes disabled for whatever reason.

**PROPOSED BY:** Charlie Lean

(EG-F19-010)

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*The Board of Game deferred this proposal from the Interior and Eastern Arctic Region meeting in March 2020, as amended to apply statewide. The original proposal was Proposal 110, and it applied only to Unit 19D.*

### **PROPOSAL 120**

#### **5 AAC 92.011. Taking of game by proxy.**

Allow proxy hunting for moose as follows:

Amend 5 AAC 92.011 to allow proxy hunting for any antlered bull moose.

**What is the issue you would like the board to address and why?** An interpretation has been made that proxy hunting is not allowed for moose in areas with an any antlered bull bag limit. Unit 19D currently has an any antlered bull bag limit so with this new interpretation proxy hunting would not be allowed in our area. However, proxy hunting is an important traditional practice in the McGrath area.

The McGrath AC was not able to meet on this issue before the proposal deadline to submit a

proposal. Therefore, if they are not supportive of this proposal when they meet next fall, I will request it be withdrawn.

**PROPOSED BY:** Roger Seavoy, McGrath Fish and Game Advisory Committee (EG-F19-052)  
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# Unlawful Methods

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## **PROPOSAL 121**

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

Allow the use of dogs to hunt big game as follows:

The use of dogs is permitted to hunt, track, and retrieve large game.

**What is the issue you would like the board to address and why?** It's currently illegal to use hunting dogs for large game such as deer, bear, etc... It is a method used for thousands of years and completely ethical. It promotes safety, 100% ethical, and still fair chase.

**PROPOSED BY:** George Lewis

(EG-F19-149)

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## **PROPOSAL 122**

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

Lower the minimum draw weight for bows for hunting big game as follows:

The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

(3) with a longbow, recurve bow, or compound bow, unless the

(A) bow is not less than (i) [40] **35** pounds peak draw weight when hunting black-tailed deer, wolf, wolverine, black bear, Dall sheep, and caribou; (ii) [50] **45** pounds peak draw weight when hunting mountain goat, moose, elk, brown/grizzly bear, musk ox, and bison;

**What is the issue you would like the board to address and why?** Archery equipment, if set up and used correctly, is extremely efficient even when using lower draw weights. Numerous studies have proved that penetration on animals has much more to do with proper arrow set up and tuning than in the power of the bow itself. In many states, deer are regularly killed with 30-pound bows and moose with 40-pound bows. Dr. Ed Ashby's studies and experiments show evidence in favor of this argument. Out of the 49 other states, 9 have a minimum draw weight of 30 pounds, 12 have a minimum of 35 pounds, 10 have a minimum of 40 pounds, and 18 have no draw weight requirements.

Out of the 9 other states with moose seasons, 1 has a minimum draw weight requirement of 30 pounds, 2 have a minimum of 35 pounds, 3 have a minimum of 40 pounds, 1 has a minimum of 45 pounds, 1 has a minimum of 50 pounds, and 1 has no draw weight requirements.

Of the 10 other states with mountain goat seasons, 2 have a minimum draw weight of 30 pounds, 1 has a minimum of 35 pounds, 4 have a minimum of 40 pounds, 1 has a minimum of 50 pounds, and 2 have no draw weight requirements.

For the 13 other states with sheep seasons, 1 has a minimum draw weight requirement of 30 pounds, 2 have a minimum of 35 pounds, 4 have a minimum of 40 pounds, 1 has a minimum of 50 pounds, and 5 have no draw weight requirements.

Out of the 4 other states with seasons for bison, 1 has a minimum draw weight requirement of 30 pounds, 1 has a minimum of 50, and 2 have no requirements. Out of the top 10 other elk hunting states, the average draw weight requirement is 40 pounds.

Every province in Canada except for New Brunswick has a minimum draw weight requirement of 18 kilograms (39.6 pounds) for all species including brown bear, moose, musk ox, sheep, mountain goat, elk, and bison. New Brunswick's minimum draw weight requirement is 20 kilograms (44 pounds).

Lowering the minimum draw weight requirements would allow more youth to be able to pursue big game animals as well as individuals who can no longer pull heavier bows. This would be especially true for those who choose to use traditional equipment with no let off. As long as bowhunters continue to hunt ethically and use efficient arrow and broadhead combinations, this lower draw weight minimum would not result in any negative effects.

**PROPOSED BY:** Mike Harris

(EG-F20-044)

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## **PROPOSAL 123**

### **5 AAC 92.085(10)(A). Unlawful methods of taking big game; exceptions.**

Allow electronic range finders mounted on bows be used for hunting big game as follows:

Update 5 AAC 92.085(10)(A) to read:

~~(10) with the following archery equipment or devices in a restricted weapons hunt that authorizes taking by bow and arrow:

(A) any type of electronic device, or light attached to the bow, arrow, or arrowhead, except a non-illuminating camera, **range finding device**, or a lighted nock on the end of an arrow;

**What is the issue you would like the board to address and why?** I would like the Board of Game to add an exception to the definition of "electronic device" which would allow the use of an electronic range finder to be mounted to the bow. The use of a laser range finder is currently allowed and a normal practice of most bow hunters when determining yardage. Using a range finder gives a more accurate yardage determination than just a visual estimation and provides for a more ethical harvest. However, often times an archer will make a yardage determination using a range finder, draw his/her bow, and see that the animal has moved. The archer must then either visually estimate the yardage change or let down from the shot and re-range the animal using a handheld range finder, which can lead to allowing the animal to move farther away and a longer shot distance. Several companies, including Garmin and Burris, have recently developed range finders which are incorporated into a bow's sighting system. This allows the archer to continuously range the animal throughout the entire shot sequence, up to and including right before the release of the arrow. This method doesn't allow the archer to do anything that isn't already allowed under

law, but merely makes it easier and allows for more ethical and humane harvests of game by giving the archer the best and most accurate range estimation possible when making a shot determination.

**PROPOSED BY:** Brian Vanderbunt

(EG-F19-007)

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## **PROPOSAL 124**

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

Allow use of integrated bow sights\laser range finders for hunting big game with bows as follows:

The existing equipment regulations from page 20 of the 2018-2019 regulations for weapons restricted hunts. My proposal would read as follows with my changes listed in bold and underlined:.

Equipment:

You MAY NOT hunt big game with a bow, UNLESS:

- the bow is at least:
  - 40 pounds peak draw weight when hunting black-tailed deer, wolf, wolverine, black bear, Dall sheep, and caribou;
  - 50 pounds peak draw weight when hunting mountain goat, moose, elk, brown/grizzly bear, muskox, and bison;
- the arrow is at least 20 inches in overall length, tipped with a broadhead, and at least 300 grains in total weight;
- the broadhead is a fixed, replaceable or mechanical/retractable blade type and not barbed.
- **an integrated bow sight\laser rangefinder may be used providing the device does not provide an optical advantage as listed in the restrictions below and does not provide an illumination on the animal being hunted (laser sight).**

You MAY NOT use electronic devices or lights attached to the bow, arrow, or arrowhead with the exception of a nonilluminating camera or a lighted nock on the end of the arrow or a battery-powered sight light **or an integrated bow sight\laser range finder as specified in the previous paragraph.**

You MAY NOT use scopes or other devices attached to the bow or arrow for optical enhancement.

You MAY NOT use any mechanical device that anchors a nocked arrow at full or partial draw unaided by the bowhunter.

**What is the issue you would like the board to address and why?** On page 19 of the 2018-2019 regulations, under the general hunt guidelines for archery hunting equipment, an integrated bow sight\laser range finder mounted to the bow is allowed for use. On page 20 of the same regulation year, under the weapons restricted hunts guidelines, this same piece of equipment is not allowed because it is considered an “electronic device”. I am asking the Board of Game (board) to consider allowing an integrated bow sight\laser range finder be used in a weapons restricted hunt, providing

the equipment meets the other restrictions listed in the regulations, specifically no optical advantage and visible light projected onto the game animal.

There are several reasons why I am asking the board to allow use of integrated bow sights\laser range finders, which meet the other restrictive measurements, for use in weapons restricted hunts.

Handheld range finders are already allowed for use in weapons restricted hunts for archery.

The International Bowhunter Education Program (IBEP) training certification program for archery hunters encourage range finders to be used. Specifically, they are encouraged for use to keep the hunter informed of ethically shooting within the range of their equipment. The idea is the hunter will not take shots that would most likely result in the injury of an animal vs the killing of an animal.

By allowing the integrated bow sight\laser range finder to be mounted on the bow, the hunter has the ability to dynamically track the distance to the animal while holding the bow in the drawn position ready to shoot. This would allow the hunter to be more informed during their shot process and allow them to shoot more accurately because they would know the exact distance to their target. At best, it would deter unethical long-distance shots that would most likely end up injuring an animal versus killing the animal.

**PROPOSED BY:** Bruce Brown

(HQ-F20-004)

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## **PROPOSAL 125**

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

Allow the use of crossbows for hunting big game in weapons restricted hunts as follows:

Crossbows are allowed in the weapons restricted hunt with the following: The crossbows used in this specific hunt are not allowed scopes, only iron sights and peep sights. The hunters using crossbows in this hunt must have successfully completed the crossbow certification course and carry that certification in the field with them.

**What is the issue you would like the board to address and why?** The issue is how crossbows are not allowed in the weapons restricted hunt, except for the "exemption hunters" which couldn't even hunt with a bow in the first place. For there are other big game hunters that would jump at the chance to hunt game in the weapons restricted hunt if they were allowed to do so with crossbows.

**PROPOSED BY:** Orion Peter Harper

(EG-F19-154)

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## **PROPOSAL 126**

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

Allow the use of muzzleloaders equipped with scopes in the taking of big game as follows:

The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

(c) the use of [A MUZZLELOADER EQUIPPED WITH A SCOPE, OR] a muzzleloader using smokeless powder as a charge during any permitted, registered or special season hunts is prohibited.

NOTE: This is the exact wording as currently exists in the regulation, with the proposed text to be deleted, mentioning scope restrictions regarding muzzleloaders for any weapons restricted hunts, being bracketed, capitalized and struck through.

**What is the issue you would like the board to address and why?** This proposal would be to eliminate wording in subsection (c) of 5 AAC 92.085 which prohibits the use of a muzzleloading weapon equipped with a scope during any permitted, registered or special season hunt for muzzleloading firearms only.

This proposal would also eliminate the wording which prohibits the use of a scope during muzzleloading weapons certification field day qualifications.

The underlying premise behind ethical big game hunting is to ensure a clean, efficient and humane take of an animal as possible. Technology has allowed the use of a scope mounted weapons to ensure the greatest potential of that being possible - significantly greater than with the use of open sights.

This proposal would allow hunters the opportunity to harvest game using the most effective technology available and minimize the number of wounded animals being lost due to poor shot placement as a result of not being able to utilize the most effective technology available. As a side note, up until a few years ago, crossbows were not permitted as an allowable alternative weapon in hunts restricted to bows and muzzleloaders, as they were considered in the same category as high-powered weapons.

Now, crossbows are permitted in this exception category for some hunts, but it is permissible for use of scopes with crossbows, but not with muzzleloading weapons.

If it is now permissible for using crossbows with scopes, should not muzzleloading weapons with scopes also be permissible?

**PROPOSED BY:** Kurt Wellong

(HQ-F20-033)

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## **PROPOSAL 127**

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

Allow air rifles for hunting big game as follows:

The use of air rifles are permitted for all game so long as the caliber is appropriate for the game size.

**What is the issue you would like the board to address and why?** Allow air rifles and air bows to be used for large game. There have been significant improvements in the technology that makes it safe and ethical.

**PROPOSED BY:** George Lewis

(EG-F19-146)

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## **PROPOSAL 128**

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

Prohibit the use of mechanical powered body suit or devices as follows:

The following methods of taking game are prohibited: **with the use of a mechanical or powered body suit or device unless the device or suit is being worn to restore function of a limb that otherwise would not function as in the case of a paraplegic.**

**What is the issue you would like the board to address and why?** Power suits or exoskeletons (powered mechanical body suits and devices) are becoming commercially available to the general public. Such suits allow an individual to carry heavier loads and travel greater distances over difficult terrain using mechanical assistance and an external energy source. Such suits may currently be legal in nonmotorized access areas within the state and yet would violate the intention for which such areas were set aside. The use of such suits would allow hunters to access normally inaccessible areas and provide an unsporting physical advantage to the hunter. If the use of such suits is allowed a guide could purchase one suit and use it for many different clients throughout the year, dramatically changing the nature of a guided hunt. If a regulation is not passed, we are likely to see hunters using these devices in the near future.

**PROPOSED BY:** Tom Young

(EG-F20-014)

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## **PROPOSAL 129**

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

Require the use of expanding (soft point) bullets for big game hunting, excluding wolf and wolverine, as follows:

The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

1. with the use of a firearm other than a shotgun, muzzleloader, or rifle or pistol using a center-firing cartridge, except that

(A) in Units 23 and 26, swimming caribou may be taken with a firearm using rim fire cartridges;

(B) the use of a muzzleloader is prohibited unless the firearm is a shoulder mounted long gun, 45 caliber or larger, with a barrel that is rifled or smoothbore, and discharges a single projectile; and

(C) the use of a muzzleloader equipped with a scope, or a muzzleloader using smokeless powder as a charge, during any permitted, registration, or special season hunt for muzzleloaders only, is prohibited;

#### **(D) taking big game, other than wolf or wolverine, using non-expanding bullets is prohibited**

**What is the issue you would like the board to address and why?** Require the use of an expanding (soft point) bullet when hunting big game, except wolf and wolverine taken under provisions of a hunting license.

Justification for this change is to reduce wounding loss of big game shot with non-expanding (solid) bullets and promote an ethical hunting practice. During many years of public testimony at Board of Game meetings, testifiers complained about hunters wounding moose, bear and caribou when using full metal jacket bullets in high velocity, small caliber rifles. Research and hunter experience clearly show big game animals shot with non-expanding bullets produce a narrow-wound channel when compared to results using expanding design bullets. The bullet from small caliber, high velocity ammunition, that does not hit bone, is likely to pass through an animal without causing sufficient damage to humanely kill it. Large game, such as moose and bears can travel long distances after being shot with solid bullets, and are generally not recovered. Although shot-placement is critical to humanly harvest big game, use of expanding bullets increase your odds of ethically killing an animal.

With some ammunition, there will be a slight increase in cost, however, the use of more lethal ammunition will reduce the number of shots required to humanly harvest an animal.

**PROPOSED BY:** Ted Spraker

(EG-F20-019)

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*The title to this proposal was clarified 9/21/20 to indicate the proposed change prohibits use of urine from any species of the deer family and is not limited to deer or elk urine.*

## **PROPOSAL 130**

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

Prohibit use of urine from any species of the deer family as bait or scent lures as follows:

The following methods of taking game are prohibited:

...

(15) with the use of [DEER OR ELK] urine **from any species of the deer (*Cervidae*) family**, and while in immediate personal possession of [DEER OR ELK] urine **from any species of the deer (*Cervidae*) family**, including scent lures;

...

(18) **repealed; 7/1/2021.** [WITH THE USE OF MOOSE, CARIBOU, AND REINDEER URINE AS SCENT LURES, AND WHILE IN IMMEDIATE PERSONAL POSSESSION OF MOOSE, CARIBOU, OR REINDEER URINE, INCLUDING SCENT LURES, IN 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?** Chronic Wasting Disease (CWD) can be transmitted by urine, and more types (species) of urine are becoming available to hunters to use as bait or scent lures. In 2012, the Board of Game (board) prohibited the use of deer or elk urine for hunting statewide, and in March of 2020 the board prohibited the use of moose, caribou, and reindeer urine for hunting in the Interior and Eastern Arctic Region. At that meeting, the department recommended the board adopt the proposal statewide. Due to the legal meeting notice not covering statewide topics, and not wanting to delay taking action on the proposal, the board adopted the proposal for the Interior and Eastern Arctic Region only. The department is now proposing a broader prohibition on the use of natural urine as bait or scent lures, in order to further protect Alaska's game populations.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-043)  
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## **PROPOSAL 131**

### **5 AAC 92.210. Game as animal food or bait.**

Allow the use of game bird wings and backs to be used for trapping bait as follows:

I recommend that bird wings of all game birds including swan, geese, and cranes including the humerus, radius and ulna, and the meat of the humerus radius and ulna be allowed for other human uses such as trapping bait statewide. The back and the meat of the back should also be used for other human uses like trapping.

**What is the issue you would like the board to address and why?** I would like to be able to use all bird wings and backbones from swan, cranes, and geese for trapping bait statewide. Bird wings and carcasses, including the backbone, have a long historical use for trapping, and I would like to be able to continue that use. I feel it is more appropriate to use natural baits rather than bring a bunch of trash into the wilderness like compact discs (CDs) and other shiny baubles.

**PROPOSED BY:** Sam Hancock (EG-F19-152)  
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## **PROPOSAL 132**

### **5 AAC 92.990. Definitions.**

#### **5 AAC 92.210. Game as animal food or bait.**

#### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Allow bird wings and parts to be used for trapping as follows:

### **Proposed Regulation**

#### **5 AAC 92.990. Definitions.**

(26)“edible meat” means,... in the case of cranes, geese, and swan **outside of Unit 18**, the meat of the breast, back, and the meat of the femur and tibia-fibula (legs and thighs), and the meat of the wings, excluding metacarpals;... **and for cranes, geese, and swan in Unit 18, the meat of the breast, and the meat of the femur and tibia-fibula (legs and thighs)**

#### **5 AAC 92.210. Game as animal food or bait.**

A person may not use game as food for a dog or furbearer, or as bait, except for the following... **for cranes, geese, and swan in Unit 18, the bones, and meat of the back and wings.**

#### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Subject to additional requirements in 5 AAC 84 – 5 AAC 85, a person taking game shall salvage the following parts for human use... **for cranes, geese, and swan in Unit 18, the bones, and meat of the back and wings.**

### **Current Regulation**

#### **5 AAC 92.990. Definitions.**

(26)“edible meat” means,... in the case of cranes, geese, and swan, the meat of the breast, back, the meat of the femur and tibia-fibula (legs and thighs), and the meat of the wings, excluding metacarpals;...

**What is the issue you would like the board to address and why?** Bird wings or other parts that don’t have much meat should be able to be used as tools for other things. Our ancestors used bones as different tools, something that is natural off the land. I believe that the person who put in the proposal they did to make it illegal except for consumption hasn’t lived in coastal villages. They have unknowingly made criminals out of all the people who can’t always afford materials they don’t make on their own. Most houses you visit in certain villages use some dried bird wings as a broom. Now that we don’t live a nomadic lifestyle as much as our ancestors we need simple ways to help keep a cleaner and healthy home. Most likely they don’t realize they are breaking the law by doing this.

Allowing for these parts to be used for trapping would be another way for people to not have to buy materials made of plastics or etc. that would be more expensive because of shipping. If the bird parts are being used, this is not a waste. It’s just not being used similar to other areas where they may live in a hub and can afford to not have to buy materials for keeping a house clean or trapping bait. They may eat that small part if they so choose.

**PROPOSED BY:** Felix Magallanes

(EG-F20-139)

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## **PROPOSAL 133**

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

Add bow and arrow as a legal method for taking beaver as follows:

Statewide:

You may not take a beaver with any means other than steel trap or snare except: **bow and arrow**

**What is the issue you would like the board to address and why?** A bow and arrow can be an effective and efficient method of taking beaver during periods of the beaver trapping season when water is not frozen. It is already legal in much of the state. I see no reason to prohibit it when in most units of the state (exception is Unit 26 no open season) the bag limit is "No Limit."

**PROPOSED BY:** John Frost

(EG-F20-129)

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## **PROPOSAL 134**

### **5 AAC 92.080.(7)(H). Unlawful methods of taking game; exceptions.**

Allow the use of cameras or sensory devices to monitor trap locations for trapping as follows:

Any camera or sensory device that can send messages through wireless **communications unless the device is specifically used on trap locations for the taking of furbearers which are actively in a trap.**

**What is the issue you would like the board to address and why?** Modern technology of wireless cameras which are commercially produced can aid in prevention of trap and fur theft. As the Alaska Court System and state District Attorney has proven, fur and trap thieves are not prosecuted. I was a victim of the theft of two Manning #9 wolf traps and one wolf by a non-trapper in Unit 2. The suspect was observed on a traditional trail camera which allowed the Alaska Wildlife Troopers to file theft charges against the person. Just by chance the suspect had never seen the camera. If he had seen the camera, he surely would have prevented the images from being used against him. The wolf was recovered and the suspect pled guilty to the crimes. After a long period of time and a few hundred dollars in boat fuel, I was never able to locate the stolen traps in the various locations the suspect said he had put them. I lost the use of the traps for the remainder of the open wolf season only to have the suspect produce the traps prior to being sentenced for the crimes. His case was then dismissed because he returned all stolen items. A modern cellular trail camera would have alerted me at the time of the trap and fur theft. Instant notification would have allowed for a fast response and possibly recovered the traps in a much quicker time period. Cellular cameras will also allow a trapper quick response to dispatch an animal in a foothold trap. At the same time, cellular trail cameras should not be allowed to aid in taking an animal unless that animal is legally a trapped furbearer.

**PROPOSED BY:** John Ryan

(EG-F20-175)

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## **PROPOSAL 135**

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

Repeal the restriction on the use of aircraft for locating Dall sheep for hunting as follows:

**Repeal 5 AAC 92.085(8):** [AND FROM AUG 10 THROUGH SEPT 20, AIRCRAFT MAY NOT BE USED BY OR FOR ANY PERSON TO LOCATE DALL SHEEP FOR HUNTING OR DIRECT HUNTERS TO DALL SHEEP DURING 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.]

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

**5 AAC 92.085(8) regarding the use of aircraft during sheep season to locate and spot sheep for harvest.**

5 AAC 92.085(8) stemmed from a board generated proposal commonly known as Proposal 207 that came out of nowhere and had little support from the public and Advisory Committees. Even the Alaska Wildlife Troopers say it is virtually unenforceable. Yet it has the potential – regardless of the caveats in the regulation – to make pilots act in unsafe ways they may not normally over fears of being turned in for spotting sheep.

The Board of Game (board) determined that using aircraft to spot sheep from the air in order to potentially harvest was unethical. Even though the board allows for the spotting of caribou from the air and same day land and shoot in an area. How is that “ethical” but the spotting of sheep from the air and the same-day-airborne restriction in place is not? This regulation was put in effect for the entire August 10 – September 20 sheep season. However, this regulation was never applied to the youth hunt season August 1–5. That is not at all consistent with the intent of the regulation when one group of sheep hunters is unfairly perceived as different from another.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

(EG-F20-064)

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## **PROPOSAL 136**

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

Rescind the restriction on use of aircraft for locating Dall sheep for hunting as follows:

This language in 5 AAC 92.085(8) should be rescinded:

[FROM AUGUST 10 TO SEPTEMBER 20, AIRCRAFT MAY ONLY BE USED TO PLACE HUNTERS AND CAMPS, MAINTAIN EXISTING CAMPS, AND SALVAGE MEAT AND TROPHIES WHILE USED FOR THE PURPOSE OF DALL SHEEP HUNTING. USING AN AIRCRAFT FOR THE PURPOSE OF SPOTTING SHEEP OR LOCATING DALL SHEEP DURING THE OPEN SEASON IS PROHIBITED.]

**What is the issue you would like the board to address and why?** The Matanuska Valley AC believes that the language that was adopted from Proposal 207, in March of 2015, that restricts the use of aircraft while hunting sheep, should be rescinded. The present language reads:

*"From August 10 to September 20 aircraft may only be used to place hunters and camps, maintain existing camps, and salvage meat and trophies while used for the purpose of Dall sheep hunting. Using an aircraft for the purpose of spotting sheep or locating Dall sheep during the open season is prohibited."*

After this proposal was adopted by the Board of Game (board), our AC had unprecedented attendance at its next meeting, and everyone was very upset by the action. Subsequently, on May 28 of 2015, the board held a special meeting at the request of two of its members, to reconsider and rescind Proposal 207's language. Proposal 207 was a board generated proposal, that they produced on their own, not at the request of anyone from the public, and which didn't address any biological concerns. Nobody had ever proposed these kind of extreme restrictions before. At the May 28 special meeting there were 224 public comments on this proposal; 184 were in opposition to it and wanted to see it rescinded, while only 27 were in support of it. All three of the largest ACs (Anchorage, Mat Valley and Fairbanks), representing over half of the state's population, voted unanimously to rescind Proposal 207. Despite this overwhelming opposition, the board retained Proposal 207, ignoring the public's will. The Alaska Wildlife Troopers said from the very beginning that these restrictions were unenforceable, and to our knowledge no one has ever been cited for a violation of them. The issues the proposer purported to address with Proposal 207 were already addressed by other statutes regarding harassing, chasing or herding animals with an airplane.

Proposals to rescind what started as Proposal 207 have been brought forward in 2016 and 2017 and both times the public has supported rescinding the restrictions by a 2 to 1 margin, but were ignored by a small board majority. We believe that, in the absence of any biological concern being addressed, the public should be listened to, and the overwhelming majority want Proposal 207 language rescinded. The board has rejected applying these same restrictions to all other game species, in Proposal 70 introduced at the statewide meeting in Fairbanks in 2016, and should reject the restrictions for sheep also.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-009)

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## **PROPOSAL 137**

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

Repeal the restriction on the use of aircraft for locating Dall sheep for hunting as follows:

Amend 5 AAC 92.085(8) by deleting the language set forth below, commonly referred to as Proposal 207:

[(8) ... FROM AUGUST 10 THROUGH SEPTEMBER 20 AIRCRAFT MAY NOT BE USED BY OR FOR ANY PERSON TO LOCATE DALL SHEEP FOR HUNTING OR DIRECT HUNTERS TO DALL SHEEP DURING 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.]

**What is the issue you would like the board to address and why?** The pertinent part of 5 AAC 92.085(8) states as follows:

[(8) ... from August 10 through September 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during 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.]

I am a law-abiding citizen, a pilot and a sheep hunter. For many reasons that I will state below I find this regulation (commonly referred to as Proposal 207) wrongfully applied to our state sheep hunting regulations.

For the youth sheep hunt August 1-5 there is no restriction as to when you can fly. During this time frame there are also many outfitters flying their area prior to the season looking and scouting for sheep. Why can a pilot fly and hunt with a youth hunter during this time frame but five days later all of a sudden it is illegal?

This regulation is extremely vague in the sense that there is no way possible to tell what animal a pilot saw or even looked for from an aircraft. I could easily have bear, sheep, goat and caribou harvest tickets with me during sheep season. There is nothing stopping me from flying around and scouting for caribou during this time frame. How will someone know what animals I was looking for or what animal I saw? Can I fly around and see a herd of caribou I intend to hunt and land and go hunt them the next day and if I see a sheep be afraid to shoot it?

One of the main reasons I am writing this proposal to change this regulation is to be a voice for your average hard-working pilot in Alaska. Flying is extremely dangerous with many variables and deaths each and every year. We do not need to restrict or limit the way a pilot should be able to fly and cause unnecessary risks to be placed upon them creating more danger than they already face.

I would like to describe a couple of very realistic scenarios for the pilot who owns his own airplane and plans to use it for sheep hunting. Please take note that the purpose of having an airplane is for the pilot to distance himself from other hunters and outfitters. I never want to land at an airstrip

because I know that there has been hunting pressure there and airplanes are likely to return to that know location to hunt sheep. My objective is to distance myself from others by utilizing my hours of preseason research, aviation skill set and my airplane to find area where I can hunt and not worry about running into others.

#### Example 1-

A pilot follows all rules and regulations to not fly during sheep season and does his scouting and flying all in the month of July. He finds an adequate place with some sheep and a location he can safely operate the airplane. Work duties or bad weather delay his arrival into his sheep camp and he isn't able to fly until opening day August 10. The pilot knows it is illegal to fly and look for sheep since the season is now open but he intends to not hunt or encroach on other hunters in this particular drainage so he flies at over 1000' above the ground to the head end of the drainage he plans to hunt to see if there are any other airplanes or bright colored tents before he decides this is where he wants to invest the only week he has off work for sheep hunting this year. This rationale only makes sense to any logical person. As I stated previously, the pilot wants to distance himself from other hunters. By doing this and looking for hunters where there may potentially be sheep after Aug 10 has this pilot violated this regulation?

#### Example 2-

A pilot does all of his pre-season scouting in July and finds a nice drainage with a big gravel bar he can land on safely. He camps here and is able to glass some rams and is excited for the opening day of sheep season to arrive. He can't get the opener of sheep season off from work so he comes in a week late. The area he intends to hunt has had heavy rains the last four days and when he flies over his 1000' gravel bar he sees that it is almost completely covered by swift moving water and is now an unsafe area to land. (I personally have had water rise and lost a runway in a matter of hours). He needs to now find a new location to sheep hunt. Since he is not flying to place or remove hunters from a camp, maintain an existing camp or salvage harvested sheep, will he be in violation of flying during sheep season as the rules state?

#### Example 3-

A pilot doesn't have the extra time or finances to scout prior to sheep season. He will take one week off for sheep hunting and that week will fall in late August. When pioneering a landing area that likely no other airplane has ever landed at there is a sequence of things that must be done. Extreme amounts of time and concentration are put into these efforts as it is a matter of life and death. When a pilot is landing in an area that he has never been able to walk on before is it very challenging. All of your knowledge and information of the landing site is received while you are in the cockpit flying the aircraft.

Sometimes a pilot will need to do 15 or more passes to see if a runway is suitable to land and to gain an increased level of confidence in their ability to safely land the airplane. These passes consist of high passes above 1000' to low passes at maybe 5' above the ground. The pilot may need to do a few circles at altitude and at a lower level to see what the wind direction/speed is especially in mountainous terrain. Also, a pilot will likely drag his tires a couple times along the strip to gauge how rough it is and visualize the exact touchdown spot for the airplane. This is a very timely process and it should not be rushed. When pilots rush things are usually when an accident will occur.

For the best possible outcome these passes should be very similar in speed and dimension that would simulate a traffic pattern. The more consistent they are the more variables that are managed the better the landing will turn out in most cases. These passes to the fellow sheep hunter on the hillside may look like the pilot could potentially be looking for sheep when they are only trying to safely land an airplane.

I have myself flown in these conditions and have wondered will this type of flying get me in trouble especially if there happen to be sheep nearby. I have also talked to fellow aviators who have rushed this off-airport evaluation process during sheep season for fear of prosecution. That is complete nonsense. A pilot should be able to fly an airplane and not have to wonder who will be turning him in.

Most recently in July of 2019 I did all my preseason scouting of sheep hunting locations. I found some good places to land and more importantly good places to tie up an airplane that was secure. With it being a very hot year the sheep I had found in July stayed very high and were inaccessible. My hunting partner and I decided we needed to go to a different area we had scouted pre-season. While flying over the first area we could see hunters in that drainage, so we decided to go to the next spot I had found.

While over flying this area looking at the strip we had cleared, it was impossible to not notice the white dots on the hillside that were in fact Dall sheep. So now what am I supposed to do? I've done preseason scouting, cleared a strip to use and located and glassed up sheep in this drainage. Now that I've moved into this drainage and looking over my strip, I see sheep on the hillside. Now I wonder while I do my passes to evaluate my landing zone if there is some hunter is on the hillside with a video camera taping all of this. Will I be getting a phone call from the troopers after sheep season is over? I reluctantly couldn't take that risk and we cut our sheep hunt short. I told my hunting partner "I love to fly and I love to hunt. Combining those things is my favorite thing do to in the entire world but right now I don't feel the same. I feel as I may be wrongfully accused for only trying to hunt sheep based on the patterns my plane is flying." This feeling made me sick and is not what hunting is about. A sheep hunter should be able to fly their airplane and not worry about wrongful accusations.

This law is also unenforceable and below are the comments from Board of Game proposals for 2019 about this regulation since it has passed from the Alaska Wildlife Troopers.

"The Alaska Wildlife Troopers are the primary enforcement agency for this regulation. Since this regulation was enacted, the Alaska Wildlife Troopers have received reports of aircraft and sheep hunters violating this regulation across the state. Investigation of this crime takes considerable time and effort for the Wildlife Troopers to look into these types of violations. **To date, there has been no successful prosecution of a hunter for a violation of this regulation.**"

The main enforcement agency in the state knows this law is ridiculous and unenforceable. The skills, resources and money used by our conservation officers should be used to find and prosecute real criminals not a resident pilot who wants to hunt sheep.

Proposal 207 has accomplished nothing. There are already wildlife harassment laws in place to keep pilots from buzzing or harassing sheep. There are also same day airborne regulations set in

place to manage that ethical dilemma. This regulation was set in place to target the **Alaskan Resident Sheep Hunters** and should be removed from the regulations.

**PROPOSED BY:** Adam Grenda

(HQ-F20-028)

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### **PROPOSAL 138**

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

Restrict aircraft use for locating Dall sheep for hunting, for all open seasons as follows:

Change the time that aircraft may not be used to locate Dall sheep in order to cover all open sheep seasons as follows:

(8) a person who has been airborne may not take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. following the day in which the flying occurred, and [FROM AUGUST 10 THROUGH SEPTEMBER 20] aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep in any area where there is an open sheep hunting season [DURING 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.

**What is the issue you would like the board to address and why?** The way this regulation is currently written, hunters may still use aircraft to locate Dall sheep during sheep hunting seasons that fall outside of the August 10 through September 20 time frame. This change would include every sheep season regardless of when it is held including any new sheep seasons that may be enacted in the future.

**PROPOSED BY:** Mike Harris

(EG-F20-043)

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### **PROPOSAL 139**

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

Restrict the use of aircraft for making multiple, consecutive approaches near Dall sheep for hunting as follows:

Change 5 AAC 92.085(8) by repealing the language in brackets and replacing it with the underlined language.

#### **5 AAC 92.085 Unlawful methods of taking big game: exceptions....**

(8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00 a.m. following the day in which the flying occurred, and from August 10 - September 20 aircraft may not be used to make multiple, consecutive approaches near any sheep or group of sheep [BE USED BY OR FOR ANY PERSON TO LOCATE DALL SHEEP FOR HUNTING OR DIRECT HUNTERS TO DALL SHEEP DURING THE OPEN SHEEP 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].

**What is the issue you would like the board to address and why?** The aircraft restrictions that apply only to sheep hunting between August 10 and September 20 are not enforceable, not supported by the vast majority of residents who commented since the inception of this rule (2015) and arose from a Board of Game proposal that was improperly offered as there was no biological concern being addressed. I would like to see it replaced with language that is already in definition (harassment).

**PROPOSED BY:** Daniel Montgomery

(EG-F20-162)

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## **Permits for Bear Baiting**

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### **PROPOSAL 140**

#### **5 AAC 92.044 (b)(4). Permit for hunting bear with the use of bait or scent lures.**

Increase the number of bait station sites temporarily from 10 to 20 per guide use area as follows:

We request increasing the number of baits per guide use area temporarily from 10 to 20. This regulation would only apply to the spring 2021 bear hunts. Most guides that use baiting as a method only use one of their three allotted guide use areas for baiting. This limits their ability to temporarily expand to make up for losses

**What is the issue you would like the board to address and why?** The COVID-19 crisis has devastated hunting businesses in the spring of 2020. Other actions will be taken to mitigate these losses in some sectors of the industry, but baited hunting was overlooked in the emergency Board of Game Meetings in the spring of 2020.

Guided baited bear hunting takes place almost exclusively in units where bears are managed very liberally due to large harvestable surpluses and little hunting pressure. There would be no conservation concern to increasing effort temporarily in these areas. There are a few guides that use bait in units 7, 14, 15, and southeast but none of them use the currently allowed 10 baits due to other land use authorization restrictions. The guides that use 10 baits are primarily, if not completely limited to the remote areas of units 11, 12, 13, 16, 20 and 25. An alternative would be to limit this temporary regulation to these areas.

**PROPOSED BY:** Alaska Professional Hunters Association

(EG-F20-123)

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### **PROPOSAL 141**

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

Require bear baiting sites to be at least one mile apart as follows:

I recommend that regulation be put into place to keep bait sites at least one mile apart.

I would also recommend that the Department of Fish and Game create a centralized database to keep track of registered bait sites including exact locations. Only then can the department keep from registering bait sites too close together.

**What is the issue you would like the board to address and why?** As bear baiting becomes more popular, hunter conflicts in the field are becoming more common due to the lack of organization. Currently, there are no regulations in place to keep bait sites at a safe distance from each other. For example, two or more people can register a bait site in the same location. Many people are putting bait sites too close together which leads not only to hunter conflict but also serious safety concerns.

**PROPOSED BY:** Tim Nelson

(EG-F20-008)

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# Permits for Possessing Live Game

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## **PROPOSAL 142**

### **5 AAC 92.029. Permit for possessing live game.**

Add emu to the to the list of animals allowed to be possessed without a permit as follows:

Add emu to the clean list 5 AAC 92.029 so that no permit is required to own them in Alaska, as is the USDA practice in all other 49 states. Emu would be allowed to be raised as livestock which is current federal law.

**What is the issue you would like the board to address and why?** I would like to have emu added to the Clean List or list B not requiring a permit. It meets all of the following criteria and is accepted as livestock by the USDA and is already being raised in all other states except Alaska. It's really surprising this wasn't added a long time ago.

- (1) is not capable of surviving in the wild in Alaska;
- (2) is not capable of causing a genetic alteration of a species that is indigenous to Alaska;
- (3) is not capable of causing a significant reduction in the population of a species that is indigenous to Alaska;
- (4) is not capable of transmitting a disease to a species that is indigenous to Alaska;
- (5) does not otherwise present a threat to the health or population of a species that is indigenous to Alaska;
- (6) is not captured from the wild for use as a pet;
- (7) does not present a conservation concern in the species' native habitat outside of this state;
- (8) can be reasonably maintained in good health in private ownership;

Emu are poultry raised for food eggs and leather in every US state except Alaska, and this is only because 5 AAC 92.029 is a backwards law that forces Alaskans to beg for permission instead of the gvt expressing legitimate reasons for a ban against any animals. I would like to raise mu for foods, pets, meat, they are USDA subsidized and meet all the conditions which is also documented by the USDA,

If any information on emu farming or birds is required I am happy to help, and all of it is on the USDA's website including care incubation range species farming methods and the benefits of the most completely utilized livestock being raised today. Thanks.

**PROPOSED BY:** Pike Ainsworth

(EG-F19-001)

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## **PROPOSAL 143**

### **5 AAC 92.029. Permit for possessing live game.**

Add emu to the to the list of animals allowed to be possessed without a permit as follows:

It might read as follows: The Alaska Board of Game has adopted and approved the ownership of emus as a pet. The Board of Game recommends that a new owner of an emu to purchase a book that covers the keeping, care, housing, interaction, diet, and health.

**What is the issue you would like the board to address and why?** I would like to propose that you add emus to the clean list so I can legally have one as a pet. Emus are very docile and friendly birds. Australian farmers have found that emus make great pets because of their sweet and friendly nature. Emus are very docile and even tempered and are very predictable. Emus are very smart and can be easily trained. Emus like learning things because in part of the attention they get while training them. Emus usually retain what they are taught. A good example of this is the Liberty Mutual commercials with Lemu and Doug. In the first one it shows Lemu with his head out the window. He's enjoying the wind in his face. When the car stops, he starts biting the seat belt. Lemu was taught to do that. In the most recent one, it shows Doug driving a motor bike with Lemu riding in the sidecar. Doug completes the jingle for Liberty Mutual then Lemu was taught to say "pay for what you need". Lemu speaks clear enough that you can understand the words pay for what you need. Emus are very good around children as they like the attention and like to play. That's why emus are becoming a favorite as a family pet. Emus like lots of love and attention. Once you meet and bond with an emu, they become very attached to you and want the love and attention that you can give them. I bought and received a book from Amazon titled Emu-Emus as pets. It covers emus keeping, care, housing, interaction, diet and health. I am 59 years old, divorced and live alone. I would prefer a female emu as I feel that a female would be more receptive of me than a male would. I also would gladly accept the challenge of caring for an abused female emu that's been kept in captivity by someone else. I would greatly appreciate it if you would take this proposal to heart and consider approving it. Thank you for your time and patience.

**PROPOSED BY:** Gary Royal Morrill

(EG-F20-022)

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## **PROPOSAL 144**

### **5 AAC 92.029. Permit for possessing live game.**

Exempt "sterilized community cats" from the list of species prohibited from being released into the wild as follows:

This proposal is a request to change Alaska Administrative Code Number **5 AAC 92.029, Permit for Possessing Live Game** (<http://www.legis.state.ak.us/basis/aac.asp#5.92.029>). Specifically, I am requesting that **5 AAC 92.029** be changed to exempt "sterilized community cats" (under Cats/Felis catus) from the list of species who are prohibited from being released into the wild.

### **5 AAC 92.029. Permit for possessing live game.**

(a) Except as otherwise provided in this chapter, or in AS 16, no person may possess, import, release, export, or assist in importing, releasing, or exporting, live game, unless the person holds a possession permit issued by the department.

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

Common Name	Scientific Name
Dog	Canis familiaris
Cat	Felis catus
Sheep	Ovis aries
Goat	Capra hircus
Cattle	Bos taurus
Oxen	Bos spp.
Horse	Equus caballus
Guinea pig	Cavia porcellus
Reindeer (except feral reindeer)	Rangifer tarandus Var.
...	

According to the current regulation, Section (i) it is stated that the board will remove a species from the list in (b) of this section, if there is a preponderance of evidence that the species:

- (1) is capable of surviving in the wild in Alaska;
- (2) is capable of causing a genetic alteration of a species that is indigenous to Alaska;
- (3) is capable of causing a significant reduction in the population of a species that is indigenous to Alaska;
- (4) is capable of transmitting a disease to a species that is indigenous to Alaska;
- (5) otherwise presents a threat to the health or population of a species that is indigenous to Alaska;
- (6) is captured from the wild for use as a pet;
- (7) presents a conservation concern in the species' native habitat outside of this state;
- (8) cannot be reasonably maintained in good health in private ownership; or
- (9) presents a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences to captive animals.

Based upon this section, there is evidence to suggest that cats: (1) is (are) capable of surviving in the wild in Alaska and (6) is captured from the wild for use as a pet.

**What is the issue you would like the board to address and why?** My name is Shannon Basner, a constituent living in Anchorage and I am submitting this proposal to the Alaska Board of Game. I am a special education teacher in the Anchorage School District working in a self-contained behavior classroom. I have taught in New York and Alaska for 25 years collectively. I am also the founder of Mojo's Hope, a nonprofit organization that rescues, rehabilitates, and re-homes animals with special needs, and provides a loving, peaceful environment through our PAWspice program for those who may be at the end of their life (<http://mojoshope.org/>); Alaska Kitty Advocacy Awareness Adoption Tails (KAAATs), a non-profit organization that promotes advocacy, awareness, and adoptions of cats (<http://www.pawprintshowlsandpurrs.org/alaska-s-kaaats>); and Paw-Prints, Howls and Purrs, a purrtography business

(<http://www.pawprintshowlsandpurrs.org/>, specializing in cat photography). In addition, I am an Associate Certified Cat Behavior Consultant through The International Association of Animal Behavior Consultants specializing in cats with specific behavior needs, such as being fearful, shy, introverted or unsocialized primarily in the shelter or foster environment, with the goal of shaping behaviors so animals are comfortable with themselves, their new environments and if possible, potential adopters. I am also certified as a Pet Loss and Bereavement Counselor through the Association for Pet Loss and Bereavement.

### **Local Community Cat Information:**

Over the past several years, we have monitored the website for Anchorage Animal Care and Control (AACC). AACC is the only open admissions shelter in the Anchorage municipality and the place most people bring cats they have trapped. The actual number of stray cats without a live outcome is not exact due to lack of transparency of the local AACC. We have offered guidance and support for the community regarding trapping, but we are bound by the current regulation. The muni website provides us with the location of the cats being trapped and we follow the outcome to the best of our ability. While this is just a snapshot into the number of community cats in our community, indications are many are coming from the same area of town in clusters and do not have a live outcome. Typically they fail their behavioral evaluation, which would be avoided if this regulation was lifted. These cats are able to thrive outdoors, but are caught by people who may not have an understanding of how to truly help them. There is strong evidence to show, with time and thorough rehabilitation, they can also be adopted into wonderful homes.

The following data has been collected over the past seven months. I am unable to track all of the incoming cats, but I collected what I could from the AACC website based upon the area of town and the number of incoming cats . The number of cats euthanized for behavior is very high and could have been avoided if the regulation was lifted.

# **Anchorage Animal Care and Control (AACC) cat collection intake and animal outcomes:**

AACC Running List of Cats								
157367	adopted		253564	adopted	252169	claimed	254765	euthanized-b
251137	euthanized-b		253601	adopted	252182	claimed	254843	euthanized-m
251138	euthanized-b		253602	adopted	252186	euthanized-b	254844	adopted
251227	returned to owner		253603	adopted	252201	euthanized-b	254902	euthanized-b
198263	adopted		253699	euthanized-b	252284	euthanized-b	254925	euthanized-b
251136	euthanized-b		253716	euthanized-b	252302	claimed	254956	claimed
251280	adopted		253722	euthanized-b	252331	euthanized-b	254961	euthanized-b
251281	adopted		253726	euthanized-b	252362	euthanized-b	254973	adopted: Pepper
			215667	claimed	252388	euthanized-b	254975	euthanized-b
251339	adopted		253753	available	252410	euthanized-b	255001	adopted
251359	euthanized-medical		254449	euthanized-b	252431	euthanized-b	255018	adopted
251371	euthanized-b		254459	not-evaluated	252504	euthanized-b	255019	euthanized-b
251376	euthanized-b		254450	euthanized-b	252577	euthanized-b	255074	euthanized-b
251383	euthanized URI		Twinkle	euthanized-b	252587	9/10/2019-euthanized b	255885	euthanized-m
251508	euthanized		254508	euthanized-b	252588	9/10/2019-euthanized-b		
251853	Simon got adopted 10/9/19 came from Tudor and Arctic		254481	euthanized-b	252723	9/10/2019-euthanized-b		
251860	euthanized-b		254581	euthanized-b	252756	adopted		
251885	euthanized uri		254618	euthanized-b	252865	euthanized-b		
251886	euthanized-b		106487	claimed	252933	euthanized-b		
251889	euthanized-disease		254468	euthanized-m	252979	adopted		
251890	euthanized-disease		254625	euthanized-b	253179	found report		
251891	euthanized URI		254628	euthanized-b	253192	euthanized-b		
251894	euthanized-medical		254647	euthanized-b	253219	euthanized-b		
251895	euthanized-medical		254673	adoption	253220	euthanized-b		
251897	euthanized-URI		254674	euthanized-b	253262	euthanized-b		
251969	euthanized-URI		254692	euthanized-b	253543	adopted		
251970	euthanized-B		254693	euthanized-b	253559	euthanized-b		
251974	euthanized-b		254694	adopted	253568	euthanized-b		
251976	adopted		254696	adopted	253699	euthanized-b		
251979	euthanized URI		254763	euthanized-b	253716	euthanized-b		
					253722	euthanized-b		
					253726	euthanized-b		

Working with AACC, Mojo’s Hope has helped rescue, rehabilitate, and rehome over 35 cats in one isolated area. Most of these cats were either trapped or caught, then vetted, spayed/neutered, rehabilitated, and rehomed. The others that were “friendly” on intake went to AACC to be adopted. The ones we didn’t bring to the shelter would not have had a live outcome due to their extreme shy natures. Because of a positive foster home, and with time and patience, they were able to find loving homes and become a family pet.

Another rescue’s efforts tracked a colony over a 15-month time period. They were initially able to trap 27 cats and in the next phase trapped the remaining 22. Out of the 49 cats trapped, two died due to illness, 20 were transferred to other rescues for adoption and 22 stayed with that rescue for vetting, spay/neuter, rehabilitation and later adoption.

In another area of town 16 cats were trapped, 15 of which were rehabilitated and adopted; one was returned to site.

Another area of town, 24 cats were trapped, all were vetted, spayed/neutered and out of the 24, 19 went up for adoption and five were returned to site.

Below is the annual data from AACC from 2017-2020. This data is available on their website. [http://www.muni.org/Departments/health/Admin/animal\\_control/Pages/AnnualStatistics.aspx](http://www.muni.org/Departments/health/Admin/animal_control/Pages/AnnualStatistics.aspx) Paper copies of this data can be found at the customer service desk of AACC, but you must go into the shelter to access the information. They have monthly meetings with the community and share the data, however on their social media presence they do not share all of it . The data that AACC collects does not differentiate between strays and the owner surrenders for no live outcome.

# **ANCHORAGE ANIMAL CARE AND CONTROL**

4711 Elmore Rd. Anchorage, Alaska 99507

(907) 343-8122

For the Month Of December, 2017

## **Animal Intakes And Outcomes**

INTAKES	CATS	DOGS	OTHER	MONTH	YTD
Impounds	4	6	0	10	146
Protective Custody	1	7	0	8	98
Truck Stray	12	19	0	31	611
Office Stray	46	54	1	101	1896
Owner Surrendered	39	29	69	137	1398
Returned	1	2	0	3	108
Owner Request Euthanasia	6	13	0	19	263
<b>Total Intakes</b>	<b>109</b>	<b>130</b>	<b>70</b>	<b>309</b>	<b>4520</b>

OUTCOMES	CATS	DOGS	OTHER	MONTH	YTD
Adopted	96	60	50	206	2024
Claimed	6	54	0	60	1184
Owner Request Euthanasia	6	14	0	20	271
Died	0	1	0	1	36
Missing	0	0	0	0	0
Released To Wild	0	0	0	0	0
Transfer	0	0	0	0	2
Euthanized	24	6	16	46	649
Feral	0	0	0	0	11
Dead On Arrival	9	8	0	17	331
<b>Total Outcomes</b>	<b>141</b>	<b>143</b>	<b>66</b>	<b>350</b>	<b>4497</b>

	CATS	DOGS	OTHER	MONTH	YTD
<b>Total Intakes</b>	<b>109</b>	<b>130</b>	<b>70</b>	<b>309</b>	<b>4520</b>
<b>Total Dead-On-Arrival</b>	<b>9</b>	<b>8</b>	<b>0</b>	<b>17</b>	<b>331</b>
<b>Total Live Animals Received</b>	<b>100</b>	<b>122</b>	<b>70</b>	<b>292</b>	<b>4189</b>

	CATS	DOGS	OTHER	MONTH	YTD
<b>Percent Claimed</b>	<b>11%</b>	<b>69%</b>	<b>0%</b>	<b>45%</b>	<b>53%</b>
<b>Percent Adopted</b>	<b>109%</b>	<b>109%</b>	<b>71%</b>	<b>109%</b>	<b>76%</b>

# ANCHORAGE ANIMAL CARE AND CONTROL

4711 Elmore Rd. Anchorage, Alaska 99507

(907) 343-8122

For the Month Of December, 2018

Animal Intakes And Outcomes					
INTAKES	CATS	DOGS	OTHER	MONTH	YTD
Impounds	3	9	1	13	189
Protective Custody	0	13	0	13	92
Truck Stray	24	25	1	50	716
Office Stray	51	57	9	117	1978
Owner Surrendered	26	43	29	98	1425
Returned	2	6	0	8	122
Owner Request Euthanasia	7	17	0	24	228
<b>Total Intakes</b>	<b>113</b>	<b>170</b>	<b>40</b>	<b>323</b>	<b>4750</b>
OUTCOMES	CATS	DOGS	OTHER	MONTH	YTD
Adopted	77	61	26	164	2169
Claimed	19	78	0	97	1211
Owner Request Euthanasia	9	17	0	26	242
Died	1	0	0	1	28
Missing	0	0	0	0	0
Released To Wild	0	0	0	0	0
Transfer	0	0	0	0	0
Euthanized	28	15	18	61	772
Feral	1	0	0	1	15
Dead On Arrival	4	7	0	11	314
<b>Total Outcomes</b>	<b>138</b>	<b>178</b>	<b>44</b>	<b>360</b>	<b>4736</b>
	CATS	DOGS	OTHER	MONTH	YTD
<b>Total Intakes</b>	<b>113</b>	<b>170</b>	<b>40</b>	<b>323</b>	<b>4750</b>
<b>Total Dead-On-Arrival</b>	<b>4</b>	<b>7</b>	<b>0</b>	<b>11</b>	<b>314</b>
<b>Total Live Animals Received</b>	<b>109</b>	<b>163</b>	<b>40</b>	<b>312</b>	<b>4436</b>
	CATS	DOGS	OTHER	MONTH	YTD
<b>Percent Claimed</b>	<b>26%</b>	<b>80%</b>	<b>0%</b>	<b>57%</b>	<b>49%</b>
<b>Percent Adopted</b>	<b>93%</b>	<b>89%</b>	<b>65%</b>	<b>91%</b>	<b>72%</b>

# ANCHORAGE ANIMAL CARE AND CONTROL

4711 Elmore Rd. Anchorage, Alaska 99507

(907) 343-8122

For the Month Of December, 2019

Animal Intakes And Outcomes					
INTAKES	CATS	DOGS	OTHER	MONTH	YTD
Impounds	1	17	0	18	185
Protective Custody	3	3	0	6	81
Truck Stray	13	18	7	38	682
Office Stray	70	60	6	136	2358
Owner Surrendered	40	52	48	140	1499
Returned	2	4	0	6	149
Owner Request Euthanasia	7	8	0	15	214
<b>Total Intakes</b>	<b>136</b>	<b>162</b>	<b>61</b>	<b>359</b>	<b>5168</b>
OUTCOMES	CATS	DOGS	OTHER	MONTH	YTD
Adopted	76	54	49	179	2285
Claimed	18	69	0	87	1423
Owner Request Euthanasia	7	11	0	18	225
Died	6	1	1	8	40
Missing	0	0	0	0	0
Released To Wild	0	0	0	0	2
Transfer	0	0	0	0	3
Euthanized	24	15	11	50	824
Feral	1	0	0	1	12
Dead On Arrival	6	10	0	16	342
<b>Total Outcomes</b>	<b>137</b>	<b>160</b>	<b>61</b>	<b>358</b>	<b>5144</b>
	CATS	DOGS	OTHER	MONTH	YTD
<b>Total Intakes</b>	<b>136</b>	<b>162</b>	<b>61</b>	<b>359</b>	<b>5168</b>
<b>Total Dead-On-Arrival</b>	<b>6</b>	<b>10</b>	<b>0</b>	<b>16</b>	<b>342</b>
<b>Total Live Animals Received</b>	<b>130</b>	<b>152</b>	<b>61</b>	<b>343</b>	<b>4826</b>
	CATS	DOGS	OTHER	MONTH	YTD
<b>Percent Claimed</b>	<b>22%</b>	<b>78%</b>	<b>0%</b>	<b>51%</b>	<b>61%</b>
<b>Percent Adopted</b>	<b>72%</b>	<b>70%</b>	<b>80%</b>	<b>71%</b>	<b>72%</b>

### **Additional benefits of removing the barrier to the regulation:**

By removing the current regulatory barrier we can move towards implementing Trap-Neuter-Return (TNR) programs to manage community cat populations.

### **Management of Community Cats**

Community cats are unowned, free-roaming cats who live outdoors. These cats may have been born in the wild, or they may be lost or abandoned pets. Most community cats are not socialized to people (i.e., feral cats), so they are unable to adjust to living indoors. If community cats are brought to an animal shelter, they experience intense suffering due to the stress of being confined and their fear of people. As a result, virtually all community cats are killed since they are not suitable for adoption. Therefore, the term “community cats” reflects the reality that for these cats, “home” is within the community rather than in an individual household.

Local governments may explore strategies to manage their municipality’s community cat population for a variety of reasons, including reducing animal control and shelter costs, stabilizing the number of cats living outdoors, and reducing nuisance complaints. They have three options

1. **Trap-And-Remove (i.e., Catch-and-Kill):** Cats are trapped, brought to a shelter, and, because most are not socialized to people and are unadoptable, killed. Any remaining cats in the area quickly breed to capacity, or new cats move in to take advantage of the newly available resources.
2. **Trap-Neuter-Return (TNR):** Cats are humanely trapped, spayed or neutered, vaccinated, ear-tipped, and returned to their outdoor home where they will continue to live while keeping newcomers at bay. Over time, TNR stabilizes or reduces community cat populations by stopping the breeding cycle and preventing unwanted litters of kittens.
3. **Do Nothing:** Cats continue to live outdoors without being spayed or neutered, vaccinated, or provided veterinary care if injured or sick. As a result, community cat populations are not managed, public health and resident concerns are not addressed, and animal welfare implications are not considered.

### **Why the Regulation Is Being Proposed:**

Alaska has a large population of community cats, yet the current Alaska Department of Fish and Game regulations allow only one option to manage them: Catch-and-Kill. Along with giving Alaska’s local governments, shelters, residents, and animals a second option: Trap-Neuter-Return (TNR), cats fit the criteria for being removed from the current list under section (i) for numbers (1) and (6). The methods of catch and kill are not reducing the population and also has hindered the process of rehabilitating those with adoption possibilities.

TNR is recognized worldwide as the most effective, sustainable, and humane approach to community cat management. Cities and shelters across America have stopped using the Catch-and-Kill approach because it is expensive, time-consuming, and ineffective. Today, over 650 municipalities have adopted a TNR ordinance or policy, and thousands more welcome the

TNR efforts of citizens. This regulation change is being proposed so communities in Alaska can legally implement a TNR program to manage their community cats.

Please see the Appendix for case studies on how TNR has transformed communities across the country, and key scientific studies that demonstrate the effectiveness of TNR programs.

There are residents and animal rescue groups who want to practice TNR in Alaska for the health and wellbeing of community cats. For example, one rescue group receives requests to trap feral cats and kittens approximately two to three times a month (sometimes higher in the summer). Since TNR is illegal, they must limit their actions to kittens who are young enough to be socialized and cats who are most likely domesticated strays. When the group explains the limited options for most of these community cats, finders are typically unwilling to trap the cats/kittens and take them to AACC to be killed. The good news is this group regularly traps, sterilizes, and vaccinates cats and kittens who are good candidates for socialization and adoption, which does help reduce the number of breeding cats in the community. The bad news is that cats and kittens who are not capable of being socialized and adopted cannot be sterilized and vaccinated because it is illegal to return them to their outdoor homes. This group continues to look forward to a time when they no longer must deny assistance to the many concerned residents who want to help *all* community cats.

My organization, Mojo's Hope, is interested in working alongside other local nonprofits to implement a TNR program in Anchorage. In March 2014, I began a dialogue with our local animal control about the effectiveness of TNR. I presented case studies, informational packets, and statistics on the impact of such programs in the lower 48. It was at this time that we discovered regulation **5 AAC 92.029** creates a barrier to TNR. Our TNR program entails humanely trapping community cats and transporting them to a veterinary clinic where they are spayed or neutered, vaccinated, and ear-tipped, which involves removing the tip of the cat's left ear, indicating he or she has been sterilized and vaccinated. Based on an assessment by the veterinary team and a cat behaviorist, healthy feral cats are then returned to their outdoor home and healthy socialized cats are brought to the local open admissions shelter or one of the local rescue groups for rehabilitation and adoption. We will work to educate the community about these community cats and respond to questions about the program and the cats. Our goal is to help the community cats of Anchorage live happy and healthy lives, mitigate concerns in the community, and help our animal control officers and shelter personnel focus their resources on animals in need.

### **Further Benefits Why the Regulation Change Should Be Adopted**

The proposed change to Alaska Administrative Code **Number 5 AAC 92.029, Permit for Possessing Live Game**, should be adopted to give local municipalities the opportunity to experience the many benefits of Trap-Neuter-Return (TNR).

#### TNR stabilizes or reduces community cat populations by:

- Increasing the number of cats who are spayed or neutered
- Decreasing the number of unwanted litters

#### TNR helps local governments and shelters save money by:

- Decreasing shelter intakes

- Every animal impounded at a shelter requires expenses for housing, sanitation, comfort, medical care, and, especially for community cats, euthanasia. Once a shelter stops taking in feral cats, and their population is stabilized or reduced, fewer animals enter the shelter and fewer expenses are incurred.
- Decreasing shelter disease and euthanasia rates
- Crowded conditions and stress increase incidences of shelter disease, especially upper respiratory infections (URI). For many shelter animals, health deterioration due to preventable illnesses results in euthanasia. When shelter intakes decrease due to TNR, more space and medical resources are available, fewer animals become sick, and fewer animals are euthanized.
- Increasing shelter save rates
- As TNR reduces the strain on a shelter's financial and physical resources and personnel, more resources are available for adoptable and special needs pets. Rather than euthanize for space, behavior, or health issues, all animals are given the best opportunity to lead happy and healthy lives.
- Increasing shelter employee morale
  - There is a growing understanding of the negative impact animal euthanasia has on the mental health and morale of shelter employees and volunteers. When they no longer bear the burden of euthanizing healthy community cats simply because they are not socialized to people, shelters save money through reduced employee turnover rates, time away from work, and worker's compensation claims.

TNR benefits local communities by:

- Increasing community support
  - When local governments and shelters support TNR, residents receive a clear message that the humane treatment of animals is a priority, and the community is transformed. Elected officials garner more support because they have addressed community concerns. Shelters grow their volunteer network because they have improved working conditions, services, and morale. Animal control officers improve their relationship with the public because they are saving more lives.
  - Decreasing nuisance complaints
  - Most cat-related complaints to animal control are due to behaviors and stresses associated with mating and pregnancies, such as yowling, roaming, and fighting. When community cats are spayed or neutered, these behaviors and stress patterns stop, complaints are reduced, and animal control officers save time (and taxpayers' dollars) by responding to fewer calls.
  - Increasing vaccination rates
  - Vaccinations are an integral component of TNR programs, which protect the

health of individual cats and reduce the disease burden in the community.

- TNR programs are often the number one provider of rabies vaccinations.

Please see the Appendix for more information on how TNR benefits public health.

In conclusion, the proposed change to Alaska Administrative Code Number 5 AAC 92.029, Permit for Possessing Live Game, should be adopted because cats fit the criteria for items (1) and (6) in section (i) and that TNR is sound public policy.

### **What Would Happen if the Regulation Is Not Changed?**

If the proposed change to **Alaska Administrative Code Number 5 AAC 92.029, Permit for Possessing Live Game**, is not adopted, Alaska's local governments, shelters, and residents will continue to be limited to only one option to manage community cats: Catch-and-Kill. The purpose of this proposal is to remove the regulatory barrier to Trap-Neuter-Return (TNR) so Alaska's communities have a second option to manage community cat populations. The change will not impact the authority of municipalities to develop programs and policies that best fit their needs. In fact, this regulatory change will support the discretion of municipalities by allowing them to choose whether TNR is right for them.

### **CASE STUDIES OF SUCCESSFUL TNR PROGRAMS**

Below are examples of communities across the country that have been transformed by Trap-Neuter-Return (TNR) programs!

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#### **ALBUQUERQUE, NEW MEXICO**

When Jim Ludwick joined the city's Animal Welfare Department in 2007, he realized several thousand cats were being euthanized each year without any evidence it successfully controlled the community cat population. Per Ludwick, "It was adding to crowding in our catteries, at a time when crowding was a major contributing factor in the suffering and death of domestic, adoptable house cats at the shelters." In 2008, the city began covering the cost for community cat spay and neuter at clinics organized by New Mexico Animal Friends, a local nonprofit organization. Four years later, Ludwick reported that the shelter's intake of cats was down 24 percent and the euthanasia rate for cats was down 72 percent. As of July 2016, the city's animal intake is down from more than 27,000 nearly a decade ago, to less than 18,000 now.

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#### **ARLINGTON, VIRGINIA**

In 2009, Arlington County approved a countywide TNR program. The decision came after years of trapping and killing community cats resulted in a continued increase of cat populations, nuisance calls, and euthanasia rates. The shelter performed spay and neuter surgeries at no cost to the public, started a foster kitten program, loaned humane traps for TNR, organized community training workshops, and stopped euthanizing feral cats. Six years later, cat-related nuisance complaints decreased 94 percent, total cat intake decreased 30 percent, and total cat euthanasia decreased 73 percent. Shelter staff morale improved and animal control officers developed positive relationships with community cat caregivers. Susan Sherman, COO of the Animal Welfare League of Arlington, the county's animal control shelter, says, "I have been surprised that almost every resident who has complained about feral cats has chosen to participate in TNR once they understand it."

**BUCKS COUNTY, PENNSYLVANIA**

In late 2015, the Bucks County Municipal Government brought in animal organizations Animal Lifeline and Red Rover to initiate a TNR program in Core Creek Park, where a population of nearly 500 community cats lived. The goal was to achieve zero cats in 10 years. Animal Lifeline and Red Rover united officials, shelters, rescues, donors, and volunteers for a TNR effort that began in April 2016. Within 10 days of the start of the program, 465 cats and kittens were trapped and spayed or neutered. Over half of those were found to be adoptable, and the 169 cats who were returned to the park now live in a safe environment with trained caregivers. The project also put in place strict measures to prevent additional cats from being abandoned in Core Creek Park. Since the 10-day TNR program ended, only one new cat and a few kittens have been found in the park. Over 80 percent of the park's cats are estimated to have been neutered, which means the colony numbers will decline. The Core Creek Park project shows that even large-scale TNR can be done over a short time period.

**Appendix**

*The appendix, references, and additional information submitted with the proposal are available on the Board's proposal book webpage at [www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook) or by contacting the ADF&G Boards Support Section at 465-6046.*

**PROPOSED BY:** Shannon Basner

(HQ-F20-029)

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**PROPOSAL 145**

**5 AAC 92.029. Permit for possessing live game.**

**5 AAC 92.230. Feeding of game.**

**5 AAC 92.990. Definitions.**

Classify *F. catus* as deleterious exotic wildlife and prohibit their release into the wild, feeding, and maintaining unconfined populations as follows:

**PROPOSAL:** (Revision of former 'Proposal 63', submitted before Alaska Board of Game, November 2017, Anchorage, AK)—**ref.** 5 AAC 92.029--permit for possessing live game; 5 AAC 92.230--prohibition against releasing pets; 5 AAC 92.029 (b), (d), (h), 5 AAC 92.990 (21), Alaska Statute 16.05.940--restrictions for and definition of "*game*" and "*deleterious exotic wildlife*":

(1) Add language to 5 AAC 92.029 (b) which specifically prohibits release of domesticated cats (*Felis catus*) into wild, rural and urban environments for any reason in the state of Alaska.

(2) Add language to 5 AAC 92.029 which specifically and by name prohibits maintaining any unconfined population or individuals of *F. catus* under the aegis of "*trap-neuter-release*", "*trap-neuter-vaccinate-release*", "*return-to-field*" or other so-called "*no-kill*" practices predicated on trapping, providing veterinary treatment for and then releasing stray/feral cats outdoors anywhere in the State of Alaska.

(3) Add language to 5 AAC 92.230 which specifically prohibits feeding unconfined *F. catus* or aggregations of same anywhere in the State of Alaska.

(4) Add language to 5 AAC 92.230 which prohibits Alaskan animal control agencies from placing *F. catus* with members of any organization practicing "no-kill" management schemes, including those which maintain unconfined *F. catus* on their own properties and/or distribute "barn cats" or "working cats" to farms or businesses ostensibly for "rodent control".

(5) Specifically prohibit keeping or maintaining unconfined/unrestrained *F. catus*--regardless of 'owned' status or lack thereof--on either public or private property in wild, rural or urban environments for any reason in the State of Alaska per 5 AAC 92.029 (b) and 5 AAC 92.230; add language specifically requiring all specimens of *F. catus* only be allowed outdoors under direct owner control, e.g. in escape-proof enclosures or restrained on leashes per 5 AAC 92.029 (d) (1).

(6) To classify all specimens of *F. catus* as deleterious exotic wildlife per definitions and relevant restrictions outlined in 5 AAC 92.990 (21), 5 AAC 92.029 (b), (d), (h) and AS 16.05.940.

**What is the issue you would like the board to address and why?** On March 15th, 2018 the Western Governors Association, which represents 22 US states and--at the time--included former Alaska Governor Bill Walker, ranked feral cats (*Felis catus*) among the five most deleterious invasive species established in our western states. Authors of the above proposal herein respectfully submit this determination constitutes a long-overdue precedent for providing an effective remedy--indeed the *only* effective remedy--to the stray/feral cat overpopulation scourge, which presents a dire threat to both public health and biodiversity.

We note the Board of Game has previously classified the following domesticated, semi-domesticated and/or wild species as deleterious exotic wildlife: domestic dogs (*Canis familiaris*), European rabbits (*Oryctolagus cuniculus*), ferrets (*Mustela putorius*), raccoons (*Procyon lotor*), turkeys (*Meleagris gallopavo*), African hedgehogs (*Antelerix* spp.), Norwegian rats (*Rattus norvegicus*) and house mice (*Mus musculus*). Its status as a "pet" notwithstanding, *F. catus* is far more destructive to naturally-occurring fauna than other terrestrial species currently included on the deleterious exotic wildlife list, many of which are likewise regarded and kept as 'pets'.

Such animals are termed "game" per 5 AAC 92.029 (d) and AS 16.05.940. This term includes feral domesticated animals. A game animal defined as deleterious exotic wildlife is *feral* if the animal is not under direct control of the owner, not confined in a cage or other physical structure, or not restrained on a leash; per 5 AAC 92.029 (i) such an animal may NOT be released--even temporarily--anywhere in the State of Alaska if there is a preponderance of evidence indicating the species:

- (1) is capable of surviving in the wild in Alaska;**
- (2) is capable of causing a genetic alteration of a species that is indigenous to Alaska;
- (3) is capable of causing a significant reduction in the population of a species that is indigenous to Alaska;**
- (4) is capable of transmitting a disease to a species that is indigenous to Alaska;**
- (5) otherwise presents a threat to the health or population of a species that is indigenous to Alaska;**
- (6) is captured from the wild for use as a pet;
- (7) presents a conservation concern to the species' native habitat outside of this state;

- (8) cannot reasonably be maintained in good health in private ownership; and
- (9) presents a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences for captive animals.

Items (1) and (3)-(5) from the above list clearly disqualify *F. catus* from being considered a species suitable for even temporary release into the wild, and just as clearly qualify them for designation as "deleterious exotic wildlife". Authors emphasize this qualification and proposed designation apply to the species *F. catus*--'owned' or 'un-owned'. We predicate this argument on:

**(1) *F. catus* is capable of surviving in the wild in Alaska.** In 2016 the Mat Su Borough animal shelter euthanized 364 feral cats--on average one a day. Shelter staff warned the numbers were increasing. The Borough has by law prohibited outdoor cats unless they're restrained on leashes or held in enclosures.

Feral cat populations have existed for many years in Anchorage, Wasilla, Soldatna, Kenai, Homer, Houston, Bethel, North Pole, Unalaska, Wrangell and Ketchikan, to name but a few locations.

Private 'cat-rescue' organizations such as 'Loving Companions Animal Rescue' (North Pole) and 'St. Francis Animal Rescue' (Wrangell) feed and maintain unconfined feral cat 'colonies' on their properties, which is unlawful per 5 AAC 92.230, per which maintaining and feeding unconfined 'pet' species, *even on one's own property* is prohibited (authors' *emphasis*). The former group has been doing so for 15 years, and the latter claims to have 'rescued' 467 abandoned and/or feral cats in the last four years. Disposition was either 'adoption' or release onto their properties. One of the authors (FHM) verified the above from the organizations' websites and with organization spokespersons in February 2019. <https://www.adfg.alaska.gov/index.cfm?adfg=pets.releasing>

Since at least 2013 Wasilla-based 'Clear Creek Cat Rescue' has argued that "*...cats need and have a right to the outside as much as humans or dogs...and to enjoy the wonders of the natural world.*" <https://clearcreekatrescue.org/about/>

Prior to 2017 this group openly declared on their website they fed and kept unconfined feeding aggregations of cats (so-called 'colonies') in the Mat-Su Valley. Since the Alaska Board of Game ruling against legalizing such colonies in 2017, the group no longer publicly admits this. However, they still admit to placing so-called 'barn cats' in southcentral Alaska and the Kenai Peninsula. On their website they describe this process as follows:

*"An adopter of barn cats will need to provide...food and water...each day, as well as shelter...They will also need to be provided with health care... In exchange for these essentials, the cats will help control the rodent population in the adopter's barns, outbuildings, gardens and around homes.*

*In most cases we offer barn cats in pairs or multiples where they have a support system...With a friendly group or companion, the cats are more likely to remain at their new home...we bring them to your home and get them set up for a 'settling in' period that will last 2 or 3 weeks. During this time they are kept in an enclosed area--tack room, garage, shed or a cage if...warm enough. They must be provided food, water and litter...until they are adjusted to the new place...after that time the door of the enclosure is opened and they are allowed to roam in and out until...settled"* (authors' *emphasis*).

It's mentioned in passing that *F. catus* are non-hierarchical and do not form 'colonies'. What groups such as Clear Creek Cat Rescue inflict on our environment and communities are human-subsidized feeding aggregations--without feeding cats will disperse into the environment.

Obviously Clear Creek Cat Rescue distributes feral cats with the intention of their being fed and maintained *unconfined* in our rural communities, and has been doing so for years. This is just as obviously in violation of 5 AAC.92.029 and 5 AAC 92.230. <https://clearcreekcatrescue.org/barn-cat-project/>.

The group describes itself as 'non-shelter', but claims to 'rescue and rehome' 500 stray, feral and 'lost' cats *annually*. In March 2019 Clear Creek Cat Rescue's founder verbally admitted to one of the authors (FHM) via telephone her group still released 'barn cats' in rural south-central Alaska and the Kenai Peninsula. When advised this was illegal she hung up.

Anchorage-based rescue group 'Mojo's Hope'/'KAAATS' have likewise admitted online to feeding and harboring illegal cat 'colonies', and declared their intention to *continue* doing so. The group's president most recently stated this online on 11/17/17, the same day the Alaska Board of Game unanimously rejected her group's proposal to allow exemptions to 5 AAC 92.029 to accommodate trap-neuter-release (TNR). She posted that the group had removed their illegal 'colonies' to undisclosed locations. Since then the group has apparently deleted all mention of this from their website.

Conclusion: invasive felines have persisted unconfined in Alaska since at least the 19th century, and probably arrived much earlier with Russian settlers. Local 'animal rescue' groups currently enable and perpetuate this in defiance of Alaska Administrative Code and state law. They essentially function as permit-less 'cat ranchers' on both public and private land in Alaska.

**(3) *F. catus* is capable of causing significant population reductions of native species.** Scott R. Loss and Peter P. Marra, both of the Smithsonian Institute's Migratory Bird Conservation Center and National Zoological Garden, and Tom Will of the US Fish & Wildlife Service's Division of Migratory Birds released in 2013 a systematic review of 84 cat predation rate studies from the lower 48 US states and found that cat predation may constitute the single greatest cause of anthropogenic bird and small mammal mortality in the US. Their results indicated that unconfined cats--both "owned" and "unowned"--slaughter on average 2.7 billion (range 1.3-4.0 billion) wild birds and 14.3 billion (range 6.3 to 22.3 billion) mammals in the US each and every year.

This and subsequent studies by these and other researchers have found that invasive feline predation is a greater cause of bird mortality than wind-turbine, power line, building, window and auto collisions, open oil container/oil-spill entrapment, agricultural toxins and hunting--*combined*. USFWS estimates current wild bird populations at ~10 billion. This estimate more-or-less doubles during peak migration season (which is for most species also peak breeding season). Cats take from 15% to 33% of the US wild bird population annually. This is tantamount to each cohort (or 'year-class') of fledglings launching themselves from their nests directly into cat gullets. <https://www.nature.com/articles/ncomms2380>

Authors noted during the November 2017 Board of Game meeting some board members' comments that scientific data presented by opponents and proponents of TNR offered "conflicting

scientific reports" in support of their respective arguments. Respectfully, this was not the case--the only *scientific* data was presented by opponents of (pro-TNR) Proposition 62.

Proposition 62 authors offered--at best--misrepresentation of three peer-reviewed studies which did not in fact support their position, and at worst outright propaganda from well-funded "nonprofit" feral cat-advocate groups which demonstrated no regard for accuracy and was predicated on no viable data. Two groups in particular--"Animal Best Friends Society" and "Alley Cat Allies"--had previously initiated science-denial campaigns attacking Loss, Will and Marra's findings, mostly via social media. The primary writers of these were P. J. Wolf and G. J. Matthews.

In June of 2018 Loss, Will, Marra and Longcore published point-by-point refutations of these groups' criticisms. To date neither Wolf, Matthews nor their respective sponsors have publicly responded to the authors' defense of their work, but have simply continued to repeat the same misinformation they've promulgated since release of the original study.

[https://www.researchgate.net/publication/326379872\\_Responding\\_to\\_misinformation\\_and\\_criticisms\\_regarding\\_United\\_States\\_cat\\_predation\\_estimates](https://www.researchgate.net/publication/326379872_Responding_to_misinformation_and_criticisms_regarding_United_States_cat_predation_estimates)

Nor is theirs the only such study demonstrating the ecological devastation caused by domestic cat predation. Similar findings have been outlined in studies published in the US, Canada, Mexico, UK, Australia, New Zealand, Israel, South Africa, Oceania, the Caribbean and elsewhere. Feral cat proliferation has become a dire threat to Australia's unique and irreplaceable wild fauna. John C. Z. Woinarski, B. P. Murphy et al released in June of 2018 a meta-analysis of 80 separate studies involving data garnered from stomach content analyses of ten thousand feral cats. From this data he found that feral cats slaughter 1.8 million native Australian reptiles each and every *day*. This carnage cuts a swath across 25% of Australia's more than 1,000 described reptile species.

Note that this toll is only attributable to *feral* cats--it doesn't count predation by the ~ 4 million unconfined 'pet' cats in Australia, which were estimated to take an additional 53 million reptiles annually. Such needless destruction of wildlife is inexcusable, unnecessary and above all unsustainable. <https://thylation.com/wp-content/uploads/2018/12/WR17160-Cats-eat-reptiles.pdf>

Authors are unaware of any specific studies of cat predation of wild species in Alaska. Yet we see no reason to expect, given the preponderance of data demonstrating invasive cats' global impacts on naturally-occurring wildlife assemblages, that the growing presence of this invasive species in Alaska will prove any less deleterious to our state's native wildlife.

Firstly, many of the migratory avian species which spend much of their yearly life cycles in Alaska have been shown to undergo significant cat-engendered population declines elsewhere in North America. Indeed, current estimates for all native North American bird species together are *one-third* what they were three decades ago.

Hence invasive cats deplete Alaskan bird populations even if much of the actual killing occurs in the lower 48 states (or beyond). Secondly, the board has in the past demonstrated due diligence by placing other species on the deleterious exotic wildlife list because of their known destructive impacts elsewhere--and rightly so.

An example is the Eurasian ferret, or polecat (*M. putorius*). Ferrets are popular pets in many regions, and were in fact domesticated in the Old World for rodent control long before cats were; nonetheless they, along with *F. catus*, are primarily responsible for the extinction of half of New

Zealand's endemic bird species, and remain an egregious threat not only to that country's surviving birds, but to nearly all of its more than 60 indigenous reptile and amphibian species, status of most of which ranges from 'threatened' to 'critically endangered'. In light of such destructive history, it hardly seems necessary to require a local study to justify placing ferrets--and even more so *cats*--on the Deleterious Exotic Wildlife List.

#### **(4) *F. catus* is capable of transmitting a disease to a species that is indigenous to Alaska**

*F. catus* transmits the following zoonotic diseases to other species, including taxa which naturally occur in Alaska.

Rabies: All mammals are susceptible to the rabies virus, although some taxa such as rodents only rarely become infected and almost never transmit it. Rabid caribou, little brown and Keen's myotis bats, Arctic and red foxes, wolves, domestic dogs and polar bears have been documented in the State of Alaska. Rabid black bears (*Ursus americanus*) have been recorded in Canada, and coyotes (*Canis latrans*)--the range of which has expanded into Alaska--have been documented rabid in Canada and the lower 48 states.

The primary wild rabies vectors in Alaska appear to be Arctic and red foxes. Endemic or "native" strains of the virus--including a self-maintaining strain in Arctic foxes (*Alopex lagopus*) which apparently doesn't kill its hosts--occurs in Alaska's north and west coastal regions, including the Aleutian Chain. Non-native strain(s) dominate in the Alaskan interior, including the Fairbanks area, where the primary vectors are invasive red foxes (*Vulpes vulpes*). Further, studies have postulated climate change may affect rabies' ecological niche in Alaska--a Scandinavian study found positive correlation between rabies incidence and increasing temperatures, and generated a model that predicted reduction of endemic Arctic strains and increase of non-endemic strains.

<https://tandfonline.com/doi/pdf/10.1080/22423982.2018.1475185>

Enter feral cats. Outside Alaska red foxes and other wild vectors, including raccoons and skunks, have been shown to readily transmit rabies to feral cats, and vice-versa. Today cats are the leading domesticated vectors of the rabies virus in the US. They have been the source of one-third of annual human rabies exposures--that's ~13,000 human exposures each and every year--for the last three decades. Without treatment, rabies is almost invariably fatal:

<https://www.documentcloud.org/documents/681002-zoonotic-diseases-associated-with-free-roaming.html>

#### Toxoplasmosis

Cats are the definitive host of a highly dangerous pathogenic protozoan—*Toxoplasma gondii*—which sexually reproduces exclusively in feline digestive tracts. In the US between 40% and 70% of free-roaming cats are infected with it and can be reinfected throughout their lives, usually by consuming infected rodents (secondary hosts).

From 15% to 20% of the US human population is also infected, and ~750 fatalities from this pathogen occur each year. Toxoplasmosis is per the CDC also the leading cause of pathogenic blindness. It is particularly dangerous to pregnant women and unborn fetuses, causing ~190,000 stillbirths, blind-births and other serious birth defects in the US annually.

[https://www.academia.edu/24189429/Toxoplasma\\_gondii\\_in\\_Circumpolar\\_People\\_and\\_Wildlife](https://www.academia.edu/24189429/Toxoplasma_gondii_in_Circumpolar_People_and_Wildlife)

<https://www.sciencemag.org/news/2019/04/scientists-decry-usdas-decision-end-cat-parasite-research>

The pathogen's oocysts are its infectious agents, and infected cats shed hundreds of millions of them with their feces. *Only* cats shed the oocysts; the single exception is dogs which ingest feces from *T. gondii*-infected cats.

The oocysts persist and remain infectious for up to 1.5 years on land, and 4.5 years in water (including seawater). With an average feral cat population growth rate of ~38 million annually in North America, *T. gondii* oocysts now occur in our environment at densities of from three to 434 per square foot. They are capable of infecting and utilizing any warm-blooded animal, including humans, as secondary hosts. Infection is permanent, even if symptoms don't immediately manifest. Toxoplasmosis is killing thousands of marine mammals from Arctic Canada to New Zealand and from the California coast to the North Sea.

[https://www.researchgate.net/publication/236608342\\_Detection\\_of\\_Toxoplasma\\_gondii\\_in\\_environmental\\_matrices\\_water\\_soil\\_fruits\\_and\\_vegetables](https://www.researchgate.net/publication/236608342_Detection_of_Toxoplasma_gondii_in_environmental_matrices_water_soil_fruits_and_vegetables)

Both Atlantic and Pacific beluga (*Delphinapterus leucas*) populations are succumbing to the pathogen--a 2014 outbreak of congenital toxoplasmosis-induced stillbirths, birth defects and chronic miscarriages among Inuit women in western British Columbia was caused by consumption of infected beluga. Between 2009-2012, toxoplasmosis killed more than ten beluga a year off Quebec: <https://news.ubc.ca/2014/02/13/bigthaw/>

Canadian researchers found that sea-ice retreat due to climate change has apparently enabled *T. gondii* oocysts to spread into waters from which they were formerly absent, and advocate ongoing toxoplasmosis screening of beluga and seal meat prior to consumption. Their studies also cited the human-assisted proliferation of domestic cats, with resulting feces-contaminated runoff from unprecedented numbers of cats causing toxoplasmosis-induced marine mammal deaths--either directly or from strandings.

<https://pressfrom.info/ca/news/canada/-98482-belugas-infected-with-cat-parasite-study.html>  
[https://www.academia.edu/24189429/Toxoplasma\\_gondii\\_in\\_Circumpolar\\_People\\_and\\_Wildlife\\_email\\_work\\_card=view-paper](https://www.academia.edu/24189429/Toxoplasma_gondii_in_Circumpolar_People_and_Wildlife_email_work_card=view-paper)

Further studies indicated *T. gondii* oocysts from feces-contaminated runoff accumulate in sessile filter-feeding organisms such as geoduck clams, mussels and oysters, as well as in those which feed in the water column like herring, anchovies and sardines. They postulated this was the route whereby toxoplasmosis is causing marine mammal die-offs. However, more recent studies suggest aquatic organisms ingest oocysts directly from water, macro-algae and substrates in their contaminated habitat, and that this may be the primary means of marine mammal infection. In any event the proliferation of *T. gondii* oocysts in Alaska's inshore marine environment poses a threat not only to our State's marine mammals, but to Alaskans who harvest them for subsistence.

[https://cfpub.epa.gov/si/si\\_public\\_record\\_report.cfm?Lab=NERL&dirEntryId=213670](https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=NERL&dirEntryId=213670)

Nor is it necessary to consume seal or whale, or even raw shellfish, to contract toxoplasmosis. Sheep, both wild and domesticated, are particularly susceptible to toxoplasmosis--this frequently manifests as chronic miscarriage/abortion in ewes, usually followed by barrenness. Toxoplasmosis is so prevalent among domesticated sheep, women are cautioned to avoid contact with them if

pregnant. The risk to human females is likewise chronic miscarriage/abortion, barrenness, stillbirths and serious birth defects in fetuses carried full-term.

Recent studies found as much as 66% of Ohio's white-tailed deer population is infected with toxoplasmosis. This is almost *entirely* from unconfined *F. catus* feces-contaminated browsing areas. Except for the bobcat (*Lynx rufus*) Ohio's native cats are extinct. Bobcat numbers there are minuscule compared to those of domestic cats, thus representing negligible contribution to this disease's prevalence among white-tailed deer. An equally alarming situation exists in Illinois, where ten Canadian hunters contracted toxoplasmosis from consuming deer they shot on a hunting trip there last December. Canadian authorities now warn against consuming deer harvested in Illinois. Toxoplasmosis is also sexually transmissible from infected males to their partners.

[https://montrealgazette.com/news/local-news/quebec-outbreak-of-toxoplasmosis-linked-to-undercooked-venison?fbclid=IwAR3mh6xoA72ZFk8O\\_AoVVY-IQmx14dd792BJyCB0dKQu\\_KtAZv9DtaffRg0](https://montrealgazette.com/news/local-news/quebec-outbreak-of-toxoplasmosis-linked-to-undercooked-venison?fbclid=IwAR3mh6xoA72ZFk8O_AoVVY-IQmx14dd792BJyCB0dKQu_KtAZv9DtaffRg0)

Although *T. gondii* oocyst density in Alaska is probably less than in the lower '48—if for no other reasons than our colder climate and relatively lower human--and therefore cat--populations, toxoplasmosis has persisted and appears to be gaining ground in the north and is infecting a variety of mammalian and avian species.

Toxoplasmosis represents a significant food safety hazard for Alaskans, among whom subsistence hunting is greater per capita than further south. A pregnant woman in Anchorage consumed toxoplasmosis-infected flesh from a moose her husband shot in October 2013, and passed *T. gondii* oocysts to her unborn child, who nearly died. At birth the infant presented with a 200 bpm heart rate and organ cavities filled with lymphocyte fluids. Thanks to heroic measures the child was stabilized, but he remains at risk of partial or complete blindness as well as hearing loss, cardiac, respiratory and seizure disorders. He will in any event be infected for life. 80% of newborns who congenitally contract toxoplasmosis will manifest usually severe symptoms within months, or years, of birth.

<https://www.adn.com/alaska-news/article/link-found-between-moose-meat-and-unborn-babys-infection/2013/10/11/>

The following is a partial list of nearctic species in which toxoplasmosis has been documented--those marked with an asterisk (\*) have been recorded in Alaska. Others were from extralimital populations of species which also occur in Alaska, most documented in Arctic Canada: moose (*Alces alces*)\*, caribou (*Rangifer tarandus*), musk ox (*Ovibos moschatus*), humpback whale (*Megaptera novaeangliae*), Risso's dolphin (*Grampus griseus*), beluga (*D. leucas*), killer whales (*Orcinus orca*), narwhal (*Monodon monoceros*), fin whale (*Balaenoptera physalus*), Minke whale (*B. acutorostrata*), Arctic foxes (*A. lagopus*)\*, red foxes (*V. vulpes*), gray wolves (*Canis lupus*), black bears (*U. americanus*)\*, brown bears (*U. arctos*)\*, polar bears (*U. maritimus*), bearded seals (*Erignathus barbatus*)\*, spotted seals (*Phoca largha*)\*, ringed seals (*P. hispida*)\*, harbor seals (*P. vitulina*), northern fur seals (*Callorhinus ursinus*), elephant seals (*Mirounga augustirostris*), Stellar's sealions (*Umetopias jumatus*)\*, walrus (*Odobenus rosmarus*)\*, wolverines (*Gulo gulo*), mink (*Neovison vison*), river otters (*Lutra canadensis*) and sea otters (*Enhydra lutris*)\*.

We again emphasize this is a *partial* list of Alaskan mammals in which toxoplasmosis has been found--nearly all warm-blooded vertebrates are susceptible to toxoplasmosis, with carnivores being particularly vulnerable. However, as previously shown herbivores also become infected by browsing *T. gondii* oocyst-contaminated areas and/or drinking contaminated water. Wild mink have ingested the oocysts directly from water in their habitat and become infected, and farmed mink from contaminated meat/offal used as feed.

The pathogen is increasingly prevalent in Nearctic wildlife--in Saskatchewan, 60% of Arctic foxes are seropositive. Infection among Canadian polar bears has doubled in the last decade to where 46% are now seropositive. In Minnesota 52% of wolves (reestablished from Alaskan stock) and 45% of river otters are infected, as are 52% of California's southern sea otter population. The latter have incurred mass die-offs from toxoplasmosis.

By no means have all Alaska's native species been tested for toxoplasmosis--the CDC refers to toxoplasmosis as a 'neglected' parasitic infection even with respect to humans. Example, authors could find no research mentioning toxoplasmosis in martens (*Martes americana*). Yet martens are commercially trapped in Alaska more than any other furbearer, and their diet is almost exclusively rodents. This strongly suggests martens may serve as secondary *T. gondii* hosts. It is an obvious--and *serious*--potential health concern for fur trappers.

All studies reviewed in preparation for this proposal documented *acute* cases of toxoplasmosis--most were fatal to the animals sampled. Said studies also included observations concerning the public health significance of toxoplasmosis in northern regions--one 1974 study found 28% of n = 1,572 Native Alaskans tested positive for toxoplasmosis antibodies. This was thought to reflect the *high percentage of families with cats* in the sampled villages; incidence of infection in targeted subsistence species was not measured in that study (see second link below). A more recent (2009) study in Nunavut, Canada found 60% of the Inuit population was seropositive for toxoplasmosis. This was attributed to harvesting/ingesting toxoplasmosis-infected terrestrial and marine mammals and waterfowl for food.

[https://www.researchgate.net/publication/14608928\\_Serologic\\_survey\\_of\\_Toxoplasma\\_gondii\\_in\\_grizzly\\_bears\\_Ursus\\_arctos\\_and\\_black\\_bears\\_Ursus\\_americanus\\_from\\_Alaska\\_1988\\_to\\_1991](https://www.researchgate.net/publication/14608928_Serologic_survey_of_Toxoplasma_gondii_in_grizzly_bears_Ursus_arctos_and_black_bears_Ursus_americanus_from_Alaska_1988_to_1991)

[https://www.researchgate.net/publication/12362457\\_Prevalence\\_of\\_Toxoplasma\\_gondii\\_Antibodies\\_in\\_Muskox\\_Ovibos\\_moschatus\\_Sera\\_from\\_Northern\\_Canada](https://www.researchgate.net/publication/12362457_Prevalence_of_Toxoplasma_gondii_Antibodies_in_Muskox_Ovibos_moschatus_Sera_from_Northern_Canada)

[http://www.epi.alaska.gov/bulletins/docs/b2005\\_07.pdf](http://www.epi.alaska.gov/bulletins/docs/b2005_07.pdf)

The worst recorded toxoplasmosis outbreak in North American history occurred in 1995. The source was Humpback Reservoir, which serves as the Victoria, BC municipal water supply. Intake filter mesh did not exclude *T. gondii* oocysts, and chlorination at levels used in drinking water do not kill them. The result was 110 acute cases in the first nine months of 1995, including 42 pregnant women, 11 newborns and at least seven cases of toxoplasmosis-induced ocular lesions. Ultimately as many as 7,000 Canadians suffered (mostly) acute infections. The life history of the pathogen with respect to its asexual reproduction in secondary hosts suggest ultimately all, or nearly all, will manifest acute infections/disease.

Victoria has what the BC SPCA admits is an "enormous" stray/feral cat population. There are numerous feral cat 'colonies'--by definition this means someone is *feeding* them--with some colonies having up to 200 cats. In adjacent Surrey, cat advocates estimate there are 20,000 unconfined cats.

<https://www.cdc.gov/mmwr/PDF/International/e-2118.pdf>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC106314/>

Of particular concern in light of the above is the threat *T. gondii* poses to drinking water supplies in rural Alaska--chlorination of these water sources is frequently as low as 0.02 ppm--insufficient to kill oocysts--and overall state of rural water treatment facilities maintenance is, if anything, worse than that of Victoria, BC a quarter-century ago.

Authors have so far mentioned only two of at least 70 cat-vectoring zoonotic diseases. "Zoonotic" is defined herein as diseases transmissible between different animal species, including humans:

**Flea-born typhus** (*Rickettsia typhi*)--in May 2018 a case of cat-vectoring *R. typhi* was reported in San Diego Co., CA. It has since become an outbreak, spreading to and through Riverside and Los Angeles counties. Hundreds of cases have been reported. In Los Angeles typhus-carrying fleas have infected Los Angeles City Hall personnel, causing temporary closure of some offices;

***R. felis***--another form of cat-vectoring typhus which may be transmitted from them to humans and other animals by ticks, true bugs, lice, mosquitoes and other blood-sucking arthropods--it can cause infections serious enough to require emergency medical intervention;

***Bartonella henselae*** and ***Afipia felis*** are both etiological agents of "cat-scratch disease"--the latter less common than the former. Transmitted by cat scratches or bites. Immunocompromised individuals are vulnerable to potentially lethal systemic complications. Infections have sometimes been misdiagnosed as adult-onset schizophrenia;

***Pasteurella motocida***--an oral bacterium in 70%-90% of cats, and transmitted through their bites. Systemic infections can be serious and cause cardiovascular damage. Cat bite wounds are frequently deep, which facilitates sepsis. Elderly people and recipients of immunosuppressive therapy are particularly vulnerable;

***Toxocara cati*** (e.g. toxocariasis, or larval migrans)--is a parasitic roundworm transmitted through contact with cat feces, causing potentially serious infections of central nervous system, ocular and renal tissues. Young children are particularly vulnerable and may be subject to developmental disability and blindness. P. J. Hotez, Dean of the Tropical Disease Institute at Baylor College of Medicine, states one-third of black American children living in low-income communities are infected. CDC recognizes toxocariasis as another 'neglected' disease;

**Giardiasis** (*Giardia lamblia*)--likewise transmitted via contaminated feces from Felids to Canids, Ovines and humans--and vice-versa. Transmissible to wildlife to the extent it can be contracted from drinking feces-contaminated water in seemingly 'pristine' areas. Also can be passed as an STD from infected to uninfected humans;

**Campylobacteriosis** (*Campylobacter jejuni*)--cats are a common vector. The organism is transmitted via incidental ingestion of feces by other animals (including humans);

***Capnocytophaga canimorsus***--associated with exposure to cat body fluids, including saliva. Has caused septicemia and meningitis. Elderly and immunocompromised people are particularly vulnerable;

**Tularemia** (*Francisella tularensis*)--the causative organism is common in the Alaskan interior--rabbits and hares are particularly susceptible. The disease can be transmitted by tick and fly bites, by consuming raw/undercooked flesh from an infected animal, drinking contaminated water in which an infected animal has died or inhaling/ingesting aerosolized *F. tularensis* bacteria. Is associated with dressing infected animals. Cats also carry and transmit the disease. The causative organism has been weaponized by the US, Russia and Japan. One application of 50 kg of *F. tularensis* aerosol can kill 19,000 people;

**Salmonellosis**, including a recently-described 'super strain' first identified in cats. *Salmonella* is per the CDC the leading cause of fatal food-borne illness (toxoplasmosis is second-place);

More than nine species of **Platyhelminthines**, i.e. flatworms or flukes, are transmissible from cats to humans. Worldwide they infect *millions* of people. Consequences include tuberculosis-like URI symptoms, cerebral hemorrhaging and seizures. Some can enter through skin on the soles of the feet;

**Q fever** (*Coxiella burnettii*)--ruminants are particularly vulnerable, but cats also carry and transmit the disease. It's highly infectious with a variety of transmission pathways. Acute cases can present as severe (life-threatening) URI, chronic endocarditis--usually fatal--and hepatitis;

**Leptospirosis**--is a potentially fatal disease caused by as many as ten different *Leptospira* bacterial strains. As it commonly infects rodents, it's commonly transmitted to cats and thence to people. Transmission may occur via skin contact or through cat urine. Severe symptoms include pulmonary hemorrhage, meningitis and hepatitis;

**MRSA**--an antibiotic-resistant *Staph aureus* strain which can cause extensive tissue necrosis--sometimes called 'the flesh-eating disease', and is potentially lethal. Commonly carried by cats and is transmissible by direct contact;

**Feline leukemia virus** (FeLV)--transmissible to wild felines such as Canada lynx. Has killed endangered Florida panthers (*Puma concolor cougar*);

***Sporothrix schenckii*** and *S. brasiliensis*--these are fungal diseases transmitted by contact with spores in soil, on vegetation and via infected cat scratches, bites and skin lesions. Domestic and wild felines--and humans--are susceptible. Also transmissible to other mammals. *S. brasiliensis* infection, until recently largely restricted to cats, produces more severe symptoms than *S. schenckii*. In Brazil thousands of cases of cat-vectored *S. brasiliensis* in people are being reported, and it's spreading to neighboring countries. *S. schenckii* is widespread in the US. *S. brasiliensis* hasn't reached here--yet.

**Leishmania infantum**--Leishmaniasis, is caused by at least 20 Leishmania bacterial strains, and is also referred to as a 'flesh-eating disease'. It's transmitted by biting flies. The disease in humans is serious and may be chronic. Cats, dogs--including wild Canids--are reservoir animals;

**Chagas' disease (Trypanosoma cruzii)**--formerly restricted to the neotropics, it has spread north with migrating human populations. It is a deadly disease from which one-third of its victims will sustain life-threatening cardiovascular complications. It's transmitted by blood-sucking 'true bugs' (order Hemiptera, family Reduviidae). Feral cats are a reservoir species, which when bitten by a Hemipterid can transmit the disease to humans. Transmission has been associated with individuals who sleep with cats;

**Chlamydia psittacii**--although usually called 'parrot fever', strains occur in pigeons and gallinaceous birds as well. Domestic mammals, including cats, are likewise hosts. It can be spread to other animals and humans via direct contact and/or respiratory droplets;

**Cryptosporidiosis (Cryptosporidium spp.)**--are pathogenic protozoans most commonly contracted by drinking water contaminated by infected animal feces. Cats (and other animals) shed Cryptosporidium oocysts with defecation. Oocysts survive in the environment for lengthy periods. Cryptosporidiosis is per the CDC a leading cause of water-borne illness;

**Plague (Yersinia pestis)**--like cats themselves, plague is invasive to North America. Cats are particularly susceptible and transmit bubonic, septicemic and (most commonly) pneumonic strains. The latter is the deadliest and hardest to diagnose and treat. Without early treatment 70% of infections are fatal.

Authors have listed less than *half* of the known zoonotic diseases carried and transmitted by cats. These diseases are more prevalent and infectious in regions with large unconfined cat populations. By demonstrating the destructive potential of this invasive disease-vector to public health and biodiversity, it is authors' hope to prevent Alaska from becoming like those regions.

**SARS-Cov2** (causative viral agent of "coronavirus")--the origin of the SARS-Cov2 pandemic is believed to be the Chinese horseshoe bat (Rhinolophus sinicus) which ranges through much of China, Nepal, Vietnam and India). Bat life history seems to lend itself to generation of novel virus outbreaks because bats roost together in dense numbers, thus facilitating spread/transmission. Such viruses can travel via respiratory droplets and possibly other body fluids, and sometimes move across species-barriers.

For example, bats' propensity for huddling in dense populations is probably the reason they're the primary wild rabies virus vector. Bat-to-human transmission of rabies via respiratory droplet inhalation has been proven.

At this point the intermediate vector between bats and humans is said to be unknown. However, it has been shown that Felids and Mustelids process the virus more effectively than other species. At least one laboratory study has demonstrated transmission between cats placed in adjacent cages. With onset of SARS-Cov2 in Wuhan, China, local authorities undertook systematic killing of cats and dogs in infected households as a precaution.

<https://www.biorxiv.org/content/10.1101/2020.03.30.015347v1.full>

It has also long been known that cats carry and transmit SARS-Cov1, precursor to the current virus and which shares 70% of its genome with SARS-Cov2. Cats have tested positive for SARS-Cov2 in the US, Belgium and more than one location in China, as have several tigers and lions at the Bronx Zoo. Recently SARS-Cov2 rapidly infected caged mink kept in large numbers on two Netherlands mink ranches. While speculated the mink originally caught the virus from humans, this has not been demonstrated--but without question it was transmitted between mink.

[https://wwwnc.cdc.gov/eid/article/10/5/04-0022\\_article?fbclid=IwAR1VAV8dZXdPWl377JbNkpaTzBSFAJRQau2QxChLhzXroSZ\\_76EOaJy2d5I](https://wwwnc.cdc.gov/eid/article/10/5/04-0022_article?fbclid=IwAR1VAV8dZXdPWl377JbNkpaTzBSFAJRQau2QxChLhzXroSZ_76EOaJy2d5I)

<https://nltimes.nl/2020/04/26/mink-found-infected-covid-19-two-dutch-fur-farms-areas-now-closed-public>

In light of these facts, allowing people to deliberately feed and maintain dense populations of domestic cats is to say the least problematic. Subsidizing dense artificial aggregations of invasive predators with food, usually near to human dwellings, is unsound in terms of public health, particularly in our current circumstances. However, so far the WHO has not found evidence of cat-to-human transmission of SARS-Cov2.

One potentially very serious problem, if it's determined that cats do consistently act as SARS-Cov2 vectors, is that this may hinder attempts to establish monitoring of the virus' spread via "contact tracing", which has in the past proved to be effective for, indeed essential to, controlling viral outbreaks. Thanks to human-driven proliferation of *F. catus*, it is now the most common and widespread terrestrial predator in North America.

#### **(5) Otherwise presents a threat to the health or population of a species that is indigenous to Alaska**

The International Union for the Conservation of Nature lists cats the second-most destructive invasive terrestrial vertebrate--only commensal rodents (*Rattus rattus*, *R. norvegicus*, *R. exulans* and *M. musculus*) are worse.

Unconfined *F. catus* represents an overarching ecological threat to native Alaskan wildlife even beyond direct predation and transmission of zoonotic disease. In high numbers they represent significant ecosystem destabilization risks. Whether "owned" or "unowned", humans subsidize cats through consistent feeding. This enables *F. catus* to exist at densities beyond the environmental carrying capacity of any naturally-occurring predator. This in turn engenders 'cascading trophic effects' through the elimination of prey species on which native predators depend.

Population growth is entirely dependent upon food supply. Natural systems reflect cyclical increases and decreases of food. With increase of Arctic grasses, ferns and shrubs, snowshoe hare populations increase, as does that of Canada lynx. With decrease in such vegetation, snowshoe hare populations decline, followed by lynx populations. This cycle of naturally-occurring organisms co-evolving through struggle to eat-and-not-be-eaten over millennia results in mutually-

sustainable numbers of predators and prey such that the latter don't exhaust their food supply and then starve, and the former don't eradicate their prey and then starve.

Feral cats have no place in such a system--they are domesticated reflex-killers. Cyclical population decrease is mitigated--or eliminated outright--by human feeding. Their killing and feeding impulses are controlled by separate regions of their brains. Humans bred them this way, perhaps even 'passively' by only supporting (and/or not culling) individuals which exhibited such behavior. This has been demonstrated experimentally in both laboratory and field.

In a San Diego, CA study by K. R. Crooks and M. E. Soule' ('Nature' 1999), wildlife kills by 35 *well-fed*, free-roaming 'pet' cats' were tallied. It was estimated these cats killed ~840 mammals, 525 birds and 595 reptiles each year. Adjusted for native species percentages (64%, 95% and 100% respectively), the cats' toll would have been ~563 native mammals, 499 native birds and 595 native reptiles--or 16 native mammals, 14 native birds and 17 native reptiles per cat/per year.

The authors warned their findings were probably underestimates, as they only counted prey items brought back to the cats' residences, not those eaten or abandoned in situ. A subsequent study by Loyd, Hernandez et al ('Biological Conservation', 2013) which utilized collar-mounted video cameras on 50 unconfined 'pet' cats found the cats only brought home 25%-50% of their prey. A similar South African study found that pet cats only returned on average 22% of the animals they killed.

If Crooks' and Soule's' death toll is adjusted to include an 'average' of the above estimates of animals killed but not recovered or counted by owners, the estimated toll becomes 944 native mammals, 837 native birds and 998 native reptiles annually--or 27 native mammals, 24 native birds and 29 native reptiles per cat/per year. This is not an unreasonable estimate. 80 native wild animals per cat/per year is slightly less than one prey animal killed every five days.

Predation varies in different regions according to prey type and availability. For example, there are no reptiles in Alaska, so cats wouldn't be expected to kill them there. In Florida, established exotic reptile species outnumber native reptile species by more than two-to-one, so it's to be expected non-native reptiles would be well-represented in cat-kills there. Nonetheless the above calculated results are comparable to (and were derived from) findings from actual cat-predation studies, and are thus offered to demonstrate cats' destructive impacts on natural ecosystems.

SPCA estimates of US stray and feral cat populations average 84.5 million (range 47 million-122 million). Add to this 58 million (range 50 million-66 million) unconfined 'pet' cats. If the above calculations are representative, then unconfined US cats slaughter *11.4 billion* native mammals, birds and reptiles annually. Recall this represents each cat taking one prey item every five days--and that it may still be an underestimate.

This highlights *F. catus*' destructive and unsustainable impact on ecological systems. 11.4 billion smaller prey items annually removed by invasive felines represents 11.4 billion food items made unavailable to native lynx, raptors, foxes, wolves and mustelids each year. Therefore these native predators must expend more energy to obtain food, thus driving the 'energy-exchange balance' (i.e. the amount of energy expended in obtaining food vs. the amount of energy obtained from it) sharply against native predators. This is an example of a cascading trophic effect. The more energy required to obtain food, the more native predators are subject to starvation, injury and/or

exposure to predation themselves. Note this is much less an issue for domestic cats subsidized by human feeding.

Alaska is one of the few regions in which North American 'apex predators' survive--trohic 'disruption' by invasive *F. catus* in Alaska may prove to be at least as intense--and as ecologically destabilizing--as its impacts globally, if the species is permitted to increase in numbers at the rate they're expanding elsewhere in the world. Alaska is home to the Canada lynx (*L. canadensis*) and--possibly--the cougar (*P. concolor*), which may be naturally expanding its range into southeast Alaska from British Columbia. Alaska needs no other cats.

[http://www.elkhornsloughctp.org/uploads/files/1238046095Crooks\\_Soule\\_1999\\_Nature\\_Mesopredators.pdf](http://www.elkhornsloughctp.org/uploads/files/1238046095Crooks_Soule_1999_Nature_Mesopredators.pdf)

<https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1656&context=natrespapers>

**PROPOSED BY:** Al-Hajji Frederick Minshall (EG-F20-028)

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# **Hunting and Other Permits**

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## **PROPOSAL 146**

### **5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Limit big game registration permits to one per species, per year as follows:

5 AAC 92.052 (19) a person may be limited to one big game registration permit **per species per year**.

**What is the issue you would like the board to address and why?** In recent years, hunters have been picking up multiple late season registration goat tags for different hunt areas in which the number of tags and the hunt dates are limited. It is not physically possible due to the limited hunt dates and distribution of hunts for a hunter to effectively access more than one area. By picking up multiple tags these hunters are taking away opportunities from other hunters. ADF&G cannot simply increase the number of tags available to deal with the issue because the number of hunters that might do in any given year is unknown and this species is sensitive to overharvest.

**PROPOSED BY:** Tom Young

(EG-F20-013)

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## **PROPOSAL 147**

### **5 AAC 92.031. Permit for selling skins, skulls, and trophies.**

Allow the sale of prepared game trophies under a permit as follows:

**5 AAC 92.031. Permit for selling skins, skulls, and trophies.** (a) A licensed taxidermist may sell an unclaimed, finished skin or trophy under a permit issued by the department after the finished skin or trophy has been unclaimed for six month, 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.

(b) A court appointed or duly authorized estate executor, or a reference in a bankruptcy, may sell a game skin or trophy in a bankruptcy or probate action if that person first obtains a permit from the department.

(c) Repealed 7/1/2008.

(d) Repealed 7/1/2008.

(e) Repealed 7/1/2008.

(f) A person who has obtained ownership of a big game trophy as a result of a divorce may sell that big game trophy only if that person first obtains a permit from the department after providing the department with a list of the big game trophies being sold and a divorce decree documenting ownership.

(g) A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year only after first obtaining a permit from the department. Any advertisement must include the permit number assigned by the department, and the department will permanently mark all hides and skulls intended for sale. All bears sold under this permit must be reported to the department within the time frame specified on the permit.

**(h) A person may sell a lawfully harvested and 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?** To allow the sale of prepared game trophies. Currently only taxidermists, estates, divorced and bankrupt persons are allowed to sell prepared big game trophies by permit. 2018 was the last time this regulation was changed, with regards to advertising the sale of certain grizzly bears, but in 2008 the regulation was changed to allow the sale of trophies from the proceeds of a divorced settlement. This regulation only allows Alaskans who fit one of these four reasons to sell a prepared big game trophy and discriminates against any other Alaskan, with no option to sell their prepared big game trophy.

The reason I am asking to allow Alaskans to have an option to sell their big game trophy by permit is. (1) At some point the state has to relinquish its ownership/control over legally harvested big game trophies, big game that has been lawfully harvested and was part of the sustained yield management plans implemented by the Board of Game, and the sale of a prepared big game trophy does not violate the sustained yield principles set out in our constitution. (2) I believe once a lawfully harvested/salvage of a big game animal has taken place and the trophy has been prepared, ownership of that trophy belongs to the harvester, just like the meat, yet Alaskans are allowed by law to barter meat for cash. Currently the only private property an Alaskan cannot sell is tobacco, alcohol, and pharmaceuticals.

**PROPOSED BY:** Russell Knight

(EG-F20-025)

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**PROPOSAL 148**

**5 AAC 92.031. Permit for selling skins, skulls, and trophies.**

Allow persons over the age of 65 to sell trophies and rugs as follows:

Our request and proposal to the Board of Game is that a permit to sell skins or trophies be granted to persons over 65 under the additional following conditions:

1. Request the person owning the bear rug to give the approximate date and place of the kill.
2. Age of the person requesting a permit to sell: a suggestion would be 65 years and older
3. Age of the bear rug: a suggestion would be the bear rug be 25 years old or older
4. Years of Alaska residency
5. Reason for selling. This could be a notarized statement

**What is the issue you would like the board to address and why?** We had submitted an initial proposal on September 27, 2017 and have had further communication since then with no result. We are respectfully re-submitting the proposal change again.

In reading and speaking with authorities, we learned that you may not receive a “permit to sell” a grizzly bear rug in the State of Alaska except for some very restrictive criteria. We understand the underlying premise that if this were not a regulation, there would be the possibility of an unscrupulous group of persons that may indiscriminately kill bears for profit.

We are requesting an amendment to this regulation that there be additions to the exceptions that presently exist. It is our understanding that “a permit to sell” can only be issued under the following circumstances:

1. That the person killing the bear passed away (the family could then sell the bear rug)
2. The person or family was declaring bankruptcy
3. Or the person owning the rug wanted to donate it.

This regulation is discriminatory toward other Alaska persons who own bear rugs and choose to sell them.

In our situation, my husband who killed the bear is now 78 years old. Our child has no interest in the rug. We are in the process of downsizing and it is our desire to sell this bear rug.

**PROPOSED BY:** Thomas and Rose Shearer (HQ-F20-003)

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## **PROPOSAL 149**

### **5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.**

Create separate Dall sheep permit draw for second-degree-kindred hunters in areas that limit the number of nonresident hunters as follows:

The newly created 2DK permits would be as follows:

**Unit 13D - DS365- East - 1 permit 2DK only. This is one of 7 nonresident permits for the 13D area.**

**Unit 14A - DS385- Friday Creek 2nd hunt-1 permit 2DK only. This is one of 5 nonresident permits for 14A.**

**Unit 14C- DS336- Ship Creek 1st hunt- 1 permit 2DK only. This is one of 8 nonresident rifle permits. This would eliminate DS236.**

**Unit 14C- DS340- Areawide Archery only. 1 permit 2DK only. This is one of 4 archery only nonresident permits.**

**Delta- DS313- First hunt- 1 permit 2DK only. This is one of a possible 7 nonresident permits.**

**Delta- DS314- Second hunt- 1 permit 2DK only. This is one of a possible 7 nonresident permits.**

**Tok- DS302- First hunt- 1 permit 2DK only. This is one of a possible 5 nonresident permits.**

**Tok- DS303- Second hunt- 1 permit 2DK only. This is one of a possible 5 nonresident permits.**

**What is the issue you would like the board to address and why?** Less than 15% of nonresident sheep hunters are second degree of kindred (2DK) hunters statewide, (hunting with a relative) but yet there is no limit to the amount of nonresident permits that they can draw in most of the draw permit areas. The Tok area is the exception, and they can draw up to 50% of the possible nonresident permits there. This large number of permits that 2DK sheep hunters can draw is greatly disproportional to their percentage of participation in sheep hunting statewide. 2DK sheep hunters also have to compete with guided hunters in the draws with no guarantee of getting any permits at all.

My solution is to create a separate draw for 2DK hunters in draw permit areas that limit the amount of nonresident hunters. Only 2DK hunters could apply for them and they could not apply for the other permits allocated to nonresidents. These permits would be taken from existing nonresident permit allocation and would not create any new nonresident permits or allocation. The areas these permits would be created for would be Units 13D, 14A, 14C, Tok management area and Delta controlled use area. There will be only one 2DK permit in Unit 13D, 14A and two in Unit 14C but 1 will be for archery only because of the very limited number of permits allocated to nonresidents in these areas. These permits will be in a 300's series to identify them as 2DK permits. All other current sheep permits are in either a 100's or 200's series format. If ADF&G can arrange for the 2DK applicants to be able to apply as partners with their relative that would be desirable. By passing this proposal the board will stabilize the sheep draws in these areas for both groups of hunters, guided and 2DK and guarantee a very fair allocation to 2DK hunters. I ask the Board of Game to create a policy that no more than 20% of allocated nonresident permits be issued to 2DK hunters in the future using this proposal as a guide.

**PROPOSED BY:** Dan Montgomery

(EG-F20-133)

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## **PROPOSAL 150**

### **5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Increase the number of times a hunter may apply for drawing permit hunts for each species as follows:

Change the maximum number of times a hunter can apply for a draw permit for each species from 6 to 10.

**What is the issue you would like the board to address and why?** Hunters can currently apply for draw permits up to six times for each species of big game. You can put all six of your opportunities in for one hunt or 6 different hunts. When this regulation was first passed in 2016 the Board of Game just doubled the number of permits applications from three to six. It has given

hunters a better chance at drawing the permit they want the most by being able to put in for it all six times. It is Alaska's version of a preference point system. I propose that we increase this from six per species to 10 per species. This would give a hunter, if they choose to put in all 10 times, an even a better chance of drawing the permit they want.

**PROPOSED BY:** Dan Montgomery

(EG-F20-048)

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## **PROPOSAL 151**

**5 AAC 92.061. Special provisions for brown bear drawing permit hunts.**

**5 AAC 92.069. Special provisions for moose drawing permit hunts.**

Require all hunters to apply for permit hunts and pay the application fee during the application period as follows:

Amend language in 5 AAC 92.061 and 5 AAC 92.069 to absolutely require that all nonresidents may only be awarded a draw permit after first applying and paying the application fee during the application period. An alternate list for cancellations may be implemented, but if there was no application and application fee received during the application period, you are not eligible to hunt that permit. There will be no over the counter tags awarded outside the draw permit process. Everyone, both resident and nonresident, must apply for and pay an application fee for a draw permit during the application period, no exceptions.

Close any loopholes, comply with the language in 92.050(1)(A) for all draw permit hunts; do not allow the department to issue discretionary draw permits to anyone who has not first applied and paid the fee during the permit application period.

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

**Nonresident moose and bear hunters “skipping” the draw permit process.** On National Wildlife Refuge (NWR) lands, guides have exclusive guiding rights, and any moose or bear draw permits that take place on those NWR lands actually are awarded to the individual guide who has the right to guide in that guide use area on federal lands. This allows guides and their clients to completely skip the draw permit process, as is outlined in this advertisement from a well-known hunt booking agent in the lower 48 (we have left out the name of the agent but are happy to provide copies of his March 2020 advertisement):

**“EXCLUSIVE! NO DRAWING KODIAK BROWN BEAR HUNT – GIANTS OF KODIAK ISLAND, ALASKA. SKIP THE PERMIT DRAWING PROCESS AND HUNT THE WORLD’S LARGEST BROWN BEARS!**

We have a few openings for the ultimate bear hunt – Kodiak Island brown bears – and if you book with this outfitter, **you can bypass the permit drawing process and start planning your trip now.”**

This same thing is happening with interior moose hunts in the Nowitna NWR where when you view the draw permit supplement after permits are awarded you will see quite a few zeroed out

applications. It shows that no one applied for that particular nonresident guided only draw permit, but in actuality those permits were utilized completely outside the draw permit process. A nonresident doesn't have to go through a "lottery" draw permit process at all, whereas a resident hunter must pay the \$5 application fee and actually apply during the application period for a **chance** to win a draw permit for these moose and bear hunts on NWR lands.

That is not the way it's supposed to work and we are asking the Board of Game (board) to fix this by amending the language in 92.061 & 92.069.

An example: **Looking at the draw permit supplement for the 2019 - 2020 draw permit period there were ZERO applications for the seven available DM 811 nonresident must-be-guided moose draw permits for the upper Nowitna drainage within the Nowitna National Wildlife Refuge.** Meanwhile, 28 nonresidents applied for the three DM 809 permits for unguided nonresidents, and 65 Alaskans applied for the 10 DM 810 permits offered to residents. The chances of drawing the DM 809 nonresident unguided permit was around ten percent while the chances of a drawing the DM 810 resident permit was around 15 percent.

**Records show, however, that all seven of the DM 811 nonresident must-be-guided draw permits were utilized in 2020, outside the draw permit process.**<sup>1</sup> The chance of drawing the DM 811 nonresident must-be-guided permit was 100 percent! Because there was no "chance" or "lottery" involved. Just a phone call to the guide with exclusive refuge guiding rights, a signed guide-client agreement and you get an over the counter tag completely outside the draw permit process.

This alone does not comply with 5AAC 92.069, which reads:

**5 AAC 92.069. Special provisions for moose drawing permit hunts**

"(a) In a moose drawing permit hunt specified in this section, a nonresident may apply for and obtain a permit only as follows:

- (1) the department may issue a drawing permit under this section only to a successful nonresident applicant who meets the requirements of this section;
- (2) the department shall enter, in a guided nonresident drawing, each complete application from a nonresident who will be accompanied by a guide; until June 30, 2015, the department may enter an application for the applicable hunt only to a nonresident applicant who presents proof at the time of application that the applicant will be accompanied by a guide, and that the guide has a guide use area registration on file with the Department of Commerce, Community, and Economic Development in accordance with AS 08.54.750 and 12 AAC 75.230, for the applicable guide use area during the season the drawing permit is valid;
- (3) the department shall enter in a non-guided nonresident drawing all other complete applications from nonresidents.

(b) The department shall issue permits as follows:

- (3) in Unit 21(B), that portion within the Nowitna River drainage upstream from the Little Mud River drainage and within the corridor extending two miles on either side of and including the Nowitna River, the drawing permit hunt is allocated 50 percent to residents and 50 percent to nonresidents; the department shall issue a maximum of 75 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 25 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of nonresidents applying for permits

for either nonresident hunt is insufficient to award the required percentage, the department may award the remaining available nonresident drawing permits to the other nonresident hunt;”

Nothing within the language of 5AAC 92.069 would seem to allow for a nonresident to skip the draw permit process. Neither do we see anything in language about “undersubscribed” permits other than where it states: *“if the number of nonresidents applying for permits for either nonresident hunt is insufficient to award the required percentage, the department may award the remaining available nonresident drawing permits to the other resident hunt.”*

The results of the 2019-2020 draw permit supplement shows ZERO applications for the DM 811 nonresident guided-only hunt and zero permits awarded, yet those apparently available permits were not awarded to the nonresident unguided hunt.

The same is true for the Unit 8 Kodiak brown bear permit system under 5 AAC 92.061. Many guides choose not to have their clients go through the permit process. Some guides even state that they don’t always utilize “their” permits allocated to their guide use area for various reasons. The regulation addresses an “alternate” list whereby hunters who had applied but were not chosen have a chance to hunt if there were cancellations, but that isn’t what is happening when nonresident clients show up in Kodiak with a signed guide-client agreement and get an over-the-counter tag. In looking at the draw permit supplement, there are typically over 30 zeroed out Kodiak nonresident must-be-guided applications each year, yet it turns out most of those are actually hunted.

Furthermore, under **5AAC 92.050 (1)(A) Required draw permit hunt conditions and procedures**, it clearly states that: “to apply for a drawing permit hunt for any hunt that requires a registered or master guide, a nonresident or a nonresident alien must contract a qualified registered guide or master guide as their agent to submit the application and provide hunting services; the contracting registered guide or master guide, shall provide, at the time of application, their current unique verification code that has been issued pursuant to 12 AAC 75.260.(d)”

<sup>1</sup> Correspondence with ADFG: Correct, we received zero applications for hunt DM811 during the Nov/Dec 2017 drawing application period for the hunt that took place in the fall of 2018. However the 7 permits were made available to hunters following our undersubscribed drawing permit process, and all 7 were picked up by hunters.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F20-020)  
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## **PROPOSAL 152**

### **5 AAC 92.050. Required permit hunt conditions and procedures.**

Require all drawing permit hunts available to residents be available for application online as follows:

#### **Amend 5 AAC 92.050 Required permit hunt conditions and procedures to add:**

(a) The following conditions and procedures for permit issuance apply to each permit hunt:

- (1) the applicant or the or the applicant's agent shall complete the application form; two hunters may apply as a party in a drawing permit hunt, and if drawn, both applicants will receive a permit; a permit application that is incomplete, or that does not include, if required, an Alaska big game hunting license number, or that contains false statement, is void; the applicant must obtain or apply for an Alaska big game hunting license before submitting a drawing permit application; **All drawing permit hunts available to resident Alaskans shall be made available for application online;** and

(A) to apply for a drawing permit hunt that requires a registered or master guide....

#### **What is the issue you would like the board to address and why?**

##### **Resident draw permit applications not available online.**

There are several resident-only draw permits in various parts of the state for moose, but you must travel to the region first to pick up a permit, typically within a limited timeframe well ahead of when the hunt occurs.

The idea behind this provision to not allow all Alaskans to apply online for a draw permit equally available to all, is to curtail opportunity for residents who may not live within that area or region by making it so expensive to fly out (and back) to another part of the state ahead of time just to pick up a permit.

This would seem contrary to the Alaska constitution in which we all should be treated equally in terms of "common use" of our wildlife resources. If a hunt is a draw-only hunt, and any Alaskan is eligible to participate, then any Alaskan should be able to apply online as with most other draw permit hunts.

**PROPOSED BY:** Resident Hunters of Alaska

(HQ-F20-021)

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## **PROPOSAL 153**

### **5 AAC 92.050. Required permit hunt conditions and procedures.**

Establish a bonus point system for bison and muskox drawing hunts as follows:

I suggest the Board of Game come up with a bonus point system for both bison and muskox similar to many of the western states. Each year an individual does not get drawn, he or she will get a bonus point. The following year, the hunter will get his or her name in the hat twice instead of once. Every unsuccessful year an application is submitted, the hunter gets his or her name in the hat an equal number of times to unsuccessful attempts. Individuals may be able to apply for a hunt after he or she will be the age ten or older at the time of the hunt. Bonus points will be lost after someone successfully draws the hunt or the species is not applied for two consecutive years. Bonus points allow everyone a chance to win but is weighted toward individuals who have been applying longer. Bonus points also help the state to generate more income since it encourages individuals to have the maximum points possible. Most western states make millions from applications alone. Within this system, the Alaskan resident would have a large preference to our wildlife resources (bison and muskox).

Currently, Alaska residents have no preference for muskox or bison in the drawing applications. This proposal would allow a strong preference to residents, potentially limiting nonresidents to only one tag every two to three years depending on the data and what the Board of Game decides. A nonresident should never have an equal or close to equal opportunity to a limited wildlife resource where the Alaskan resident draw odds are less than 1%

**What is the issue you would like the board to address and why?** Draw-only permit hunts for both residents and nonresidents reflect a need to limit the number of hunters afield for reasons that could be related to conservation, trophy-quality, hunt aesthetics, crowding etc. Whatever the rationale for a draw-only hunt for all user groups, and whatever the species, resident hunters should have a clear and substantial priority to draw a permit and an opportunity to hunt.

Resident hunters don't currently have that preference. Currently, we have bison and muskox draw-only hunts for both residents and nonresidents that allow equal opportunity for a nonresident to draw a permit. Examples are: DI 403 and DX 001/003. If an individual hunter lives in Alaska, Florida, Montana, or Texas, each individual hunter has equal odds to our extremely limited Alaskan resource. The DI 403 Delta bison permit had 15,570 applicants for 45 permits in 2020 for less than one percent chance of drawing for all applicants. The DX 001 and DX 003 Nunivak Island Muskox permits are similar. These rare and highly sought-after draw permit hunts should not allow nonresidents an equal opportunity to draw. Currently, the nonresident draw percentage for Delta bison is about one percent. That is the same odds of drawing as a resident. That is not fair to the resident hunter who has been putting in for decades for that permit, who lives here and contributes all year to the economy, and does not have reciprocal hunting opportunities in any of the western states.

**PROPOSED BY:** Brad Sparks

(HQ-F20-022)

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## **PROPOSAL 154**

### **5 AAC 92.050. Required permit hunt conditions and procedures.**

Direct ADF&G to issue an additional permit when a party application is drawn as last permit as follows:

The language and intent in 5 AAC 92.050 are clear, and no changes are necessary. I am asking the Board of Game to direct the Department of Fish and Game to issue an additional permit when a party application is drawn as the last permit.

This protocol **would not apply** in hunts where less than 10 permits are issued.

**What is the issue you would like the board to address and why? In 5 AAC 92.050. Required permit hunt conditions and procedures.** (a) The following conditions and procedures for permit issuance apply to each permit hunt:

1. the applicant or the applicant's agent shall complete the application form; two hunters may apply as a party in a drawing permit hunt, and if drawn, both applicants will receive a permit, etc.

The intent of this regulation is clear but it is not the procedure followed in every draw hunt. If a party application is drawn as the last available permit to be issued, those applicants are not awarded a permit. Under the current system, the next single applicant is awarded that "last" permit.

According to information from department staff, this is not a common occurrence but does happen several times each year where a party application is drawn when only one permit is available. Draw permits are so difficult to win, it seems unfair to not award a permit to a person that was a winner.

**PROPOSED BY:** Ted Spraker

(EG-F20-026)

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## **PROPOSAL 155**

### **5 AAC 92.XXX. New regulation.**

Establish protocol for ADF&G to issue "any bull" resident moose permit in selective harvest hunts as follows:

Establish a protocol to issue a limited number of resident draw permits for "any bull" moose in units managed by the selective harvest strategy as follows. In units managed by the selective harvest strategy, the department shall issue a limited number of "any bull" moose permits consistent with the sustained harvest principle.

As an example, in the following (current) selective harvest units or portions of Units: 1B, 1C, 3, 6A, 7, 9E, 11, 12, 14A, 14B, 14C, 15A, 17B, 17C, 19B, 19C and 21A, the department could issue a limited number of "any bull" moose permits consistent with the sustained harvest principle. Unless a larger number is warranted in an area, 3 to 10 any bull moose permits will be offered annually in the draw.

**What is the issue you would like the board to address and why?** Under the current system, there are only three units under selective harvest management where a small number of "any bull" permits are offered for hunting moose. In Unit 13, five permits were offered and 8,815 applications received; in subunits 15B and 15C, 28 permits were offered and about 9,000 applications received; in subunit 16A, 10 permits were offered and 2,918 applications were received. These three hunts generated \$103,665 for wildlife management during a time when management funds are in decline. Currently, there are 17 additional units or portions of units managed under selective harvest that should be opened to a small number of any bull permits, consistent with the sustained harvest management principle. Equally important, by providing more areas hunters will be afforded an opportunity to apply in their local area, resulting in improved odds for all hunters.

**PROPOSED BY:** Ted Spraker

(EG-F20-027)

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## **PROPOSAL 156**

### **5 AAC 92.050. Required permit hunt conditions and procedures.**

Allow qualified crossbow hunters the ability to apply for Methods and Means Exemption permits for archery only hunts as follows:

5 AAC 92.050(a) The following conditions and procedures for permit issuance apply to each permit hunt:

...

(9) an applicant for a certified bowhunters only permit hunt must successfully complete a department-approved bowhunter education course before submitting a permit application. **Applicants who intend to apply for a Methods and Means Exemption permit to use a crossbow in an archery only hunt must successfully complete a department-approved crossbow hunter certification course before submitting an application for a certified bowhunters only permit.**

**What is the issue you would like the board to address and why?** With the implementation of a crossbow education course, people are no longer able to take the bowhunter education (IBEP/NBEF) course with a crossbow. As a result, only applicants with a bowhunter education certification (IBEP/NBEF) can apply for archery only drawing permits, while applicants who have only completed the crossbow education certification course cannot apply for archery only drawing permit hunts.

The Board of Game can allow those crossbow hunters who want to participate in archery only hunts to apply with their crossbow education certification number. If successfully drawn, the applicant would still be required to apply for and obtain a Methods and Means Exemption permit in order to use a crossbow in the archery only hunt.

If no action is taken, crossbow hunters who physically cannot use archery equipment are unable to apply for archery only hunts. There are physically disabled hunters that apply for and receive Methods and Means Exemption permits to use crossbows in archery only hunts. Those hunters

are no longer able to apply for archery only drawing permit hunts. Adoption of this proposal would provide those disabled crossbow hunters the opportunity to apply for archery only drawing permit hunts.

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

(HQ-F20-054)

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## **PROPOSAL 157**

### **5 AAC 92.104. Authorization for methods and means disability exemptions.**

Amend the language in the existing regulation for authorizing methods and means disability exemptions to be more consistent with the statute as follows:

5 AAC 92.104(a) A person with a disability, or their personal representative, may submit an application on a form available from the department for an exemption from a methods and means requirement set out in this chapter. The application must

(1) include a signed statement from a **physician licensed to practice medicine in the state of Alaska** [LICENSED PHYSICIAN] explaining the nature and extent of the person's disability;

AS 16.05.940(25) "person with developmental disabilities" means a person who presents to the department an affidavit signed by a physician licensed to practice medicine in the state stating that the person is experiencing a severe, chronic disability

(A) attributable to a mental or physical impairment or a combination of mental and physical impairments;

(B) that is manifested before the person reaches 18 years of age;

(C) that is likely to continue indefinitely;

(D) that results in substantial functional limitations in three or more of the following areas of major life activity: self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, and economic self-sufficiency;

(E) that reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated;

(F) and that the person is not a danger to themselves or others; and

(G) and that the person does not suffer from a mental illness; in this subparagraph, "mental illness" means an organic, mental, or emotional impairment that has substantial adverse effects on a person's ability to exercise conscious control of the person's actions or ability to perceive reality or to reason or understand.

AS 16.05.940(26) "person with physical disabilities" means a person who presents to the department either written proof that the person receives at least 70 percent disability compensation from a government agency for a physical disability or an affidavit signed by a physician licensed to practice medicine in the state stating that the person is at least 70 percent physically disabled;

**What is the issue you would like the board to address and why?** The Department of Fish and Game regularly receives applications for Methods and Means Exemption permits signed by nurses, nurse practitioners, physician's assistants, chiropractors, and medical doctors. The inconsistency between regulation and statute makes it unclear exactly which signatures are allowed. In addition

to changing the language in the regulation to more closely match the statute, the department is also asking the board to provide guidance regarding which level of physician can sign the application.

If no action is taken the department will continue to receive applications signed by medical professionals that are not authorized to sign them (e.g. nurses), which results in denial of permits, additional doctor visits, and additional staff time reviewing otherwise straightforward applications.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-056)  
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### **PROPOSAL 158**

#### **5 AAC 92.210. Game as animal food or bait.**

Allow dog mushers to be eligible to receive game from the state by permit for use as dog food as follows:

Add “dog musher” as an approved group who the state could permit to take inedible game furnished by the state, like they do with trappers now.

**What is the issue you would like the board to address and why?** We would like to add “dog musher” to the group of who can be called by the state to take inedible for human consumption, road kill or seized animals. Dog mushers would have to be called by the state and obtain a permit to utilize game furnished by the state like trappers can already do. This would give the state more options of trying to find a group trapper or dog musher to use an animal that can’t be used for human consumption but is still good for use by trappers or dog mushers.

**PROPOSED BY:** Copper Basin Advisory Committee (EG-F19-157)  
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# **Salvage and Sealing Requirements**

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## **PROPOSAL 159**

**5 AAC 92.165. Sealing of bear skins and skulls.**

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

**5 AAC 92.175. Sealing of beaver.**

Change the sealing and reporting requirements to business days instead of calendar days as follows:

*All Hunting/Trapping Sealing and Reporting regulation requirement are to be based off of ADF&G Office **Business Days, including exemptions of State & Federal Holidays.***

Example.

Bear - 30 *business* day sealing requirement for brown bear, black bear at an ADF&G office from the date of harvest or from the first state business day if harvested on a Saturday, Sunday, or holiday.

Moose - 5 business day reporting requirement to an ADF&G office from the date of harvest or from the first state business day if harvested on a Saturday, Sunday, or holiday.

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

## **SEALING AND REPORTING.**

***Calendar day vs. business day.*** Alaska hunting and trapping regulation requires sealing or reporting of wildlife on a *calendar day*.

## **ISSUE**

- ADF&G offices operate only during the *business week*.

- ADF&G staff is not available to perform required sealing and reporting tasks on weekend days, as well as state or federal holidays.

- Alaska State Troopers have refused to seal bears on weekends or have indicated they are not equipped with the correct supplies to perform sealing or reporting requirements for species.

- Hunters/trappers are at a disadvantage to comply with state regulation as state staff and or office may not be open to the public to comply with existing regulation.

- In the event of state budget issues, and ADF&G staff was reduced to a -day work-week, this could place a further disadvantage to hunters/trappers to comply with sealing and reporting regulation.

-If a pandemic, terror attack or natural disaster presents itself and closes ADF&G offices, hunters and trappers cannot comply with sealing and reporting regulation if offices are closed.

Example: A moose hunter has five days to check in his/her harvest under the spike, fork, 50-inch or three brow tine regulation. While hunting with a family/group on a weeklong trip, perhaps he/she harvests a bull on a Tuesday...they must then potentially end a hunt early to return to town to check the bull into ADF&G by Friday as Monday would be day six from the harvest, and thereby outside of the acceptable sealing period. Therefore, hunting opportunity for others in the party would consequently be limited to accommodate the harvest over the ability to continue to hunt as the season allowed. ADF&G offices are closed on Saturdays, Sundays, as well as holidays therefore limiting the opportunity to comply as currently based on CALENDAR days, and not BUSINESS days with the **5-day reporting regulation**.

**PROPOSED BY:** Zach Decker

(EG-F20-009)

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## **PROPOSAL 160**

### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Clarify the wanton waste regulation to specify that game animals taken by domestic pets must be reported and salvaged for human consumption, as follows:

- (a) A person taking game not listed in (a) of this section shall salvage for human consumption all edible meat, as defined in 5 AAC 92.990. In addition,

(1)...

**(7) any owner or caretaker of a domestic animal that kills a game animal must, in addition to salvaging the meat for human consumption, report the take to the department no less than annually. If the owner or caretaker cannot identify the species of the game animal, it must be delivered to the department for identification as soon as possible.**

**What is the issue you would like the board to address and why?** Domestic animals kill millions of game animals in Alaska annually according to estimates based on national figures. Dogs account for some of this take, but cats are primarily responsible for the high numbers. Many of these game animals are protected species such as songbirds; however, some dogs are capable of killing game animals as large as moose (most frequently calves) and cats kill snowshoe hares, red, ground and flying squirrels, spruce and ruffed grouse, ptarmigan and ducks (all of which require salvage of meat or hides); unclassified game such as shrews, mice and crows (all of which are included in the hunting regulation booklet); furbearers such as marten, ermine and muskrats; as well as a wide variety of other game animals (primarily wild birds).

By definition, all wild animals in Alaska are game animals. Compiling and analyzing game harvests is a fundamental exercise of the Department of Fish and Game's mandate and authority. Unfortunately, cats don't always bring prey items back to their owners. But many do. There is no other straightforward way to ascertain the impact of domestic pets on game animal populations than by requiring the owners to report their pets' annual kill.

A reporting requirement for harvesting game animals is not without precedent. The state requires hunters to report kills on harvest tickets in accordance with 5 AAC 92.010. Similarly, a person who collides with a big game animal is required to notify the Alaska State Troopers as soon as possible, according to 5 AAC 92.220(b), and those figures are shared with the department.

Alaska is the only state with a legislative mandate to manage game animals intensively for human consumption. The Alaska Legislature and Board of Game have demonstrated a compelling interest in minimizing the wanton waste of game. The meat of most game animals killed by pets is wasted. It's a reasonable extension of the legislature's intensive management and wanton waste laws to better understand and minimize the wanton waste of game killed by pets.

**PROPOSED BY:** Rick Sinnott (EG-F20-035)

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### **PROPOSAL 161**

#### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Change the salvage requirement for sheep, goat and deer to all meat on the outside of the ribs as follows:

Change the salvage requirements of sheep, goat and deer from [ALL THE MEAT OF THE RIBS] to all of the meat on the outside of the ribs.

This would not include moose, caribou, elk, bison and muskox.

**What is the issue you would like the board to address and why?** We would like to see the salvage requirements of sheep, goat, and deer be changed to make it all of the meat on the outside of the rib rather than all the meat of the ribs. This would NOT include moose, caribou, elk, bison and muskox.

This would encourage hunters to still take as much good meat as logistically possible from the animal, but not enforce the taking of rib meat between the actual ribs. A hunter may remove the entire rib cage if they choose, or they may be selective when it comes to not taking bloodshot or tainted meat from any portion of the rib meat. Especially in mountain animals, poor shots or damage to the meat from a fall are much more common and often contaminates the inside of the rib meat. This would allow the hunter to salvage the usable meat and not worry if checked by a wildlife trooper. It would also apply to deer in southeast Alaska and on Kodiak, where large brown bears are present, and there may be a safety issue when butchering deer in the field. The process of removing the meat between the ribs adds precious time to a twilight hunting situation, where leaving the kill site in an appropriate amount of time is imperative. In most cases this would amount to less than a pound of meat. It is already not required to remove rib meat from black bear

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-008)

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## **PROPOSAL 162**

### **5 AAC 92.220. Salvage of game meat, furs, and hides.**

Require the salvage of the meat or hide of snowshoe hare as follows:

**5 AAC 92.220. Salvage of game meat, furs, and hides.** (a) Subject to additional requirements in 5AAC 84 - 5 AAC 85, a person taking game shall salvage the following parts for human use:

- (1) the hide of a wolf, wolverine, coyote, fox, lynx, marten, mink, fisher, weasel, and land otter, and the hide or meat of a beaver, muskrat, pika, ground squirrel, **snowshoe hare**, or marmot;

**What is the issue you would like the board to address and why?** Currently there is no salvage requirement for snowshoe hare statewide. This proposal would create a statewide salvage requirement for human use. The human use requirement would be met as long as some portion of the carcass is used for human consumption, trapping, sewing, dog training, dog food, etc. This proposal would simply prohibit the take of a snowshoe hare with no attempt to recover, eat, or in any way make an attempt to use part or all of the carcass. Trappers would be allowed to use a whole or portion of a carcass for trapping bait.

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

(HQ-F20-057)

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# Bag Limit

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## **PROPOSAL 163**

**5 AAC 92.130. Restrictions to bag limit.**

**5 AAC 92.010. Harvest tickets and reports.**

Count wounded big game animals towards the hunter's bag limit for all units and require additional action in the field from hunters that attempt to take game as follows:

Reconstruct 5 AAC 92.130:

- [ (F) IN UNITS 1 - 5 AND UNIT 8, A BLACK OR BROWN BEAR WOUNDED BY A PERSON COUNTS AGAINST THAT PERSON'S BAG LIMIT FOR THE REGULATORY YEAR IN WHICH THE BEAR IS TAKEN. HOWEVER, IN UNITS 1 - 5 AND UNIT 8, A BROWN BEAR WOUNDED BY A PERSON DOES NOT COUNT AGAINST THAT PERSON'S ONE BEAR EVERY FOUR REGULATORY YEARS BAG LIMIT ESTABLISHED IN 5 AAC 92.132.
- (G) IN UNIT 8, AN ELK WOUNDED BY A PERSON COUNTS AGAINST THAT PERSON'S BAG LIMIT FOR THE REGULATORY YEAR IN WHICH THE ELK IS TAKEN.]

To read 5 AAC 92.130:

- (f) In Units 1-26 a big game animal wounded by a person counts against that person's bag limit for the regulatory year in which the animal is taken. The wounding of an animal of any species does not prevent that person from hunting that particular species the following regulatory year.
- (g) Upon attempting to take a big game animal the hunter is obligated to inspect the surrounding area in which the animal was standing to determine if the animal was wounded. A person must use every lawful means at their disposal to bag a wounded animal while it is in danger of escaping.

Add section (m) to 5 AAC 92.010 as follows:

- (m) A hunter who wounds a big game animal and that animal is not recovered must, before leaving the field, remove the day and month from the harvest ticket or permit and lock the metal locking tag when applicable.

**What is the issue you would like the board to address and why?** That any wounded game be counted against the hunter's bag limit.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-011)  
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## **PROPOSAL 164**

### **5 AAC 92.130. Restrictions to bag limit.**

### **5 AAC 92.010. Harvest tickets and reports.**

Count wounded big game animals towards nonresident hunter's bag limit for all units, excluding the one sheep and one bear every four years as follows:

Add section (k) to 5 AAC 92.130 as follows:

**• (k) In Units 1-26 a big game animal wounded by a nonresident hunter that animal will count against that hunter's bag limit. However a wounded brown bear does not count against that person's one bear every four regulatory years bag limit established in 5 AAC 92.132; and a wounded Dall sheep does not count against the person's one sheep every four regulatory years bag limit as established in 5 AAC 85.055.**

Add section (m) to 5 AAC 92.010 as follows:

**• (m) If a nonresident has wounded a big game animal but that animal was not recovered the hunter at the end of a contracted hunt or before leaving the field, the hunter must remove the day and month from their harvest ticket or permit and lock their big game metal locking tag.**

- Many outfitters already have this or similar written into their contracts.
- 12 AAC 75.340. PROFESSIONAL ETHICS STANDARDS FOR GUIDES. (d) Field craft standards. (2) use every lawful means at the licensee's disposal to bag a wounded animal while it is in danger of escaping, or, in a serious emergency, while human life or well-being is endangered.
- Nonresident hunters should be held to the utmost highest standard when hunting big game is concerned.
- It is commonly taught in hunter education courses to take the most ethical shot on an animal yet there is no accountability for making poor judgement calls in the field.
- A nonresident hunting with or without a guide could currently continue to hunt after an animal is wounded but not dispatched or retrieved.
- There are areas of the state that already have a regulation to include wounded game in a person's bag limit for both residents and nonresidents for certain species. This exemplifies that an expanded version of this type of regulation to hold nonresidents to a standard of ethics that is being taught as well as to protect our game from unreasonable loss is within the powers of the Board of Game.
- All methods of take have some probability of wounding game, however, current trends such as long range shooting have a high potentiality of wounded game. That game deserves the respect of being ethically hunted and dispatched.

- For hunt report filing purposes the report would be filled out as though an animal were taken, however, an additional option for “Was the animal recovered? Yes/No” would be included in the reporting process.

**What is the issue you would like the board to address and why?** That any big game wounded by a nonresident be counted against that hunter’s bag limit.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-012)  
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## **PROPOSAL 165**

### **5 AAC 92.050. Required permit hunt conditions and procedures.**

Apply auction permit holder's bag limit to the year the animal is taken as follows:

Auction permit bag limits should apply only to the calendar year the animal is taken, and the hunter should be able to hunt the animal with a permit or auction tag the next year. The hunter would also be able to bid on the auction permit after a successful harvest of the same species in prior years.

**What is the issue you would like the board to address and why?** We would like to see auction permit holders' harvest only apply to that year’s bag limit. This would allow the hunter to bid on the same auction permit the following year, or to bid on an auction permit after a prior successful hunt. It would allow for more bids to be placed, which in turn would generate more money for the Alaska Department of Fish and Game, and would give the hunter the opportunity to hunt the same species again. It would not increase the nonresident harvest.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (HQ-F20-007)  
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## **Miscellaneous Topics and Game Management Unit Boundaries**

*(Licensing and feeding animals; Game Management Unit boundaries, Dalton Highway Corridor Management Area; Nonresident non-guided hunts; and prohibiting harvest of white animals)*

### **PROPOSAL 166**

#### **5 AAC 92.012. Licenses and tags.**

Amend the requirement for licenses and tags to include game legally taken with dogs and cats as follows:

#### **5 AAC 92.012. Licenses and tags**

(a) No hunting or trapping license is required of a resident under the age of 18. 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. **No person may take game (except deleterious exotic wildlife) with a dog or cat, unless the dog or cat is used to find, tree, or retrieve game taken in season and in an area open to hunting in association with a hunting license or permit.**

(b) ...

**What is the issue you would like the board to address and why?** In 1916 Edward Howe Forbush observed that “a man may be fined \$10 for killing a songbird, but he may keep any number of cats.” Our pets, particularly cats and dogs, are capable of injuring and killing wildlife. Dogs can kill a moose or caribou; however, state and local regulations have significantly reduced the number of wild animals killed by dogs. For instance, AS 03.55.030 allows any person to kill a free-ranging dog that habitually annoys domestic or wild animals after giving the owner reasonable opportunity to restrain the animal. And the local jurisdictions where most dogs live usually require dogs to be licensed and leashed, which promotes responsible ownership. Not so with cats. State law does not allow a person to shoot a cat harassing wildlife and most local jurisdictions do not require licenses, much less leashes for cats.

Cats are not native to North America. However, the number of pet cats has tripled during the last 40 years, and pet cats are now more numerous than dogs, with an estimated 94 million pet and 70-100 million unowned cats in the U.S. Cats are now the most abundant terrestrial carnivore in North America.

Free-ranging cats, including many pets but also feral, abandoned, and stray cats, kill an estimated 1.3 to 4 billion wild birds and 6.3 to 22.3 billion mammals annually in the contiguous United States.<sup>1</sup> Using the same predation rates as the national study, an estimated 30,000 free-ranging and 74,600 pet cats are estimated to kill 1,148,000 birds and 5,975,000 mammals annually in the Municipality of Anchorage alone.<sup>2</sup> These estimates are driven primarily by the high numbers of cats. The average pet cat probably kills less than a bird a month, but it adds up.

Cats kill far more wild animals than they do house mice, rats or other deleterious exotic species. Cats are now the single greatest cause of wild bird mortalities. They kill more birds than windows, communication towers, vehicles, and pesticides combined.<sup>1</sup> Many of their prey are not normally considered game animals. However, cats compete with coyotes, foxes, lynx, ermine and other mid-sized furbearers and fur animals by removing voles, shrews, squirrels and even snowshoe hares from the food chain. Cats hunt and kill even when well fed.

If your dog is harassing wildlife and you know about it but don't do anything, Alaska law allows your neighbor to shoot the dog. If your young son is shooting protected birds or game birds out of season with his BB gun, you are responsible and may be fined. If you use your dog to find or retrieve game birds, you need a hunting license. Alaskan falconers, who possess birds of prey to hunt game animals, are required to purchase a hunting license even if the bird isn't flown that year. But if your cat is killing dozens of birds and small mammals every year, you don't need a hunting license and you'll never suffer the indignity of a game violation for your cat's wanton waste.

That's wrong and it should be rectified. People who own pet cats or feed stray or feral cats should be held responsible for taking protected species or "hunting" in closed areas or out of season. In other words, they should be required to purchase a hunting license annually if they know or can be reasonably expected to know that their cat is hunting wildlife, and to take reasonable precautions to prevent the cat from hunting protected species, in closed areas, or out of season.

Everyone knows free-roaming cats kill wild birds and mammals and, in a perverse sense, that cat predation is "hunting related." Reasonable precautions should include keeping cats indoors or otherwise under control, affixing a predation-control device to the cat's collar, or not owning a cat in the first place. Certainly, abandoning a cat or allowing a cat to roam outside presupposes that the cat will prey on wild birds and mammals.

<sup>1</sup> Loss, S.R., T. Will, and P.P. Marra. 2013. The impact of free-ranging domestic cats on wildlife in the United States. *Nature Communications* 4. <http://www.nature.com/articles/ncomms2380>

<sup>2</sup> Sinnott, R. 2019. Animal control in Anchorage, Alaska: cats and dogs deserve equal treatment. Prepared for the Anchorage Animal Control Advisory Board and Anchorage Watershed and Natural Resources Advisory Commission, Anchorage, Alaska. 110 pp. <https://www.muni.org/Departments/OCPD/Planning/SiteAssets/Pages/WNRCReso-MinutesArchive/WNRC%20ltr%20to%20Animal%20Control%20Board%20w%20Report-12-20-2019%20rev.pdf>

**PROPOSED BY:** Rick Sinnott

(EG-F20-033)

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## **PROPOSAL 167**

### **5 AAC 92.230. Feeding of game.**

Add cats and dogs (and wild birds from April 1 to September 30) to the list of species that may not be intentionally or negligently fed outdoors without a permit, as follows:

### **5 AAC 92.230. Feeding of game**

(a) Except as provided in (b) of this section or under the terms of a permit issued by the department, a person may not

(1) negligently feed a moose, deer, elk, sheep, bear, wolf, coyote, fox, wolverine, **dog, cat,** [OR] deleterious exotic wildlife, **or wild birds from April 1 to September 30,** or negligently leave human food, animal food, mineral supplements, or garbage in a manner that attracts these animals;

(2) intentionally feed a moose, deer, elk, sheep, bear, wolf, coyote, fox, wolverine, **dog, cat,** [OR] deleterious exotic wildlife, **or wild birds from April 1 to September 30,** or intentionally leave human food, animal food, mineral supplements, or garbage in a manner that attracts these animals.

(b) The prohibitions described in (a) of this section do not apply to the use of bait for trapping furbearers or deleterious exotic wildlife, or hunting bears under 5 AAC 92.044, or hunting wolf, fox, or wolverine with bait as described in 5 AAC 92.210, and elsewhere under 5 AAC 84 - 5 AAC 92.

**(c) It is an affirmative defense to a prosecution for illegal feeding under this section that the food placed outside to feed dogs or cats or to attract birds is in a feeder that is designed, reinforced, enclosed, mounted or suspended in such a fashion that prevents a wild or deleterious exotic animal listed in (a) from consuming the food, or any animal from spilling the food so that it can be consumed by a wild or deleterious exotic animal listed in (a).**

**What is the issue you would like the board to address and why?** In the 1970s the State of Alaska prohibited feeding bears to minimize habituation to humans and attracting them to human habitation. Habituation combined with a desire for anthropogenic foods can result in wildlife threatening public safety or damaging property. In the past four decades a variety of other species have been added to the list, and the prohibition on the feeding of game has been refined and made more enforceable.

Feeding domestic animals outdoors is prohibited if it attracts bears and other animals on the list. Presumably, feeding cats, dogs and wild birds outdoors is also prohibited when it attracts bears and other species on the list. And yet many people do so. The problem is that a bear, coyote, fox or other species on the list must be attracted by the food in order to trigger the violation. Once that happens, of course, the cat is already out of the bag. Many pet owners and bird feeders are unaware that a bear, rat, house mouse, pigeon or other animal on the list is consuming the food, at least initially. The problem is magnified many fold by the sheer number of households in a place like Anchorage, the Mat-Su Valley, Fairbanks, Juneau, or Kenai.

Species have been included on the list because feeding them outdoors leads to property damage and threats to public safety. If cats and dogs were not fed outdoors, that would significantly limit the amount of food left outside for other species to eat.

This is not mere speculation. Food left outdoors for pets or unowned domestic animals like feral cats often attracts wild and deleterious exotic animals, thereby negligently violating the law. Some “feeding stations” for feral cats in rural settings and city parks attract far more wildlife than cats and “feeding stations” in urban and suburban areas also attract rats, house mice, pigeons and starlings.<sup>1,2,3</sup>

Similarly, bird feeders attract bears during the months they are out of their dens. Birdseed, suet, peanuts, sugar water, and other foods placed outside for wild birds are just as likely to attract bears as pet food left outdoors. This doesn’t seem like much of a problem until you realize that thousands of Alaskans feed birds during the summer months when bears are active. The birds don’t need anthropogenic foods during the summer, and relatively few birds are attracted to feeders. Often, a bird feeder filled in spring retains the same seeds all summer long.

Adding cats, dogs and wild birds to the list of species that cannot be fed outdoors without taking precautions will promote safer pet feeding practices, attract and habituate far fewer bears and other listed species, and greatly simplify enforcement of this regulation.

<sup>1</sup> Hawkins, C.C., W.E. Grant, and M.T. Longnecker. 2004. Effect of house cats, being fed in parks, on California birds and rodents. Pp. 164-170 in Proceedings 4th International Urban Wildlife Symposium. <https://cals.arizona.edu/pubs/adjunct/snr0704/snr070421.pdf>

<sup>2</sup> Theimer, T.C., A.C. Clayton, A. Martinez, D.L. Peterson, and D.L. Bergman. 2015. Visitation rate and behavior of urban mesocarnivores differs in the presence of two common anthropogenic food sources. Urban Ecosystems 18:895-906. <https://link.springer.com/article/10.1007/s11252-015-0436-x>

<sup>3</sup> Leikam, B., and G. Kerekes. [2018]. Feeding the feral: a study on feral cat’s environmental impact. Urban Wildlife Research Project blog. <https://urbanwildliferesearchproject.com/feeding-the-feral-a-study-on-feral-cats-environmental-impact/>

**PROPOSED BY:** Rick Sinnott (EG-F20-036)  
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## **PROPOSAL 168**

### **5 AAC 92.XXX. New regulation.**

Adopt a new regulation that specifies the Board of Game will not require guides for nonresidents hunting moose, caribou or black bear as follows:

Prohibit the creation of any new must-be-guided moose, caribou, or black bear hunts for nonresident U.S. citizens.

**What is the issue you would like the board to address and why?** Creation of new “must-be-guided” hunts for nonresidents.

The Alaska Legislature in statute (AS 16.05.407) requires all nonresident (U.S. citizen) hunters to be accompanied by a licensed guide when hunting Dall sheep, brown bear, or mountain goat, and

requires all nonresident aliens (AS 16.05.408) to be accompanied by a licensed guide when hunting any big game animal.

Resident Hunters of Alaska (RHAK) continues to believe that the Board of Game does not have the authority outside the legislature to create new must-be-guided species for nonresident U.S. citizens. However, the Department of Law attorney attached to the board believes otherwise.

Aside from taking this issue before the legislature, we would like the board to prohibit the creation of any new must-be-guided hunts for nonresident U.S. citizens for species not within AS 16.05.407.

Whenever the board creates these new must-be-guided hunts for moose, for example, in the interior, it causes residents to lose opportunity. These must-be-guided moose hunts for nonresident U.S. citizens are in fact a separate subsidy and allocation to individual guides and the legislature never intended to require nonresident U.S. citizens to be accompanied by a guide when hunting moose, or caribou or black bear.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F20-019)  
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### **PROPOSAL 169**

#### **5 AAC 92.XXX. New regulation.**

Prohibit the harvest of white animals as follows:

No white animals should be harvested for any reason as it violates Native American religion.

**What is the issue you would like the board to address and why?** No white animals should be harvested as it violates Native American religions. A white bison was born in our state along with white moose, ravens, and a killer whale in the last few years which is prophecy according to Native American religions which indicates the times we live in and spiritual responsibility. Killing them for any reason violates this spiritual belief that there could be negative natural effects to earth and mankind for doing so. We now have many “lower 48” natives who hold this spiritual belief that are now residents of Alaska. If this proposal is not enacted profiteers could make multiple thousands of dollars for the hide while insulting and committing spiritual blasphemy to Native American religions. It could have a worse effect than we know.

**PROPOSED BY:** Ed Sarten (EG-F19-142)  
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## **PROPOSAL 170**

### **5 AAC 92.450. Description of game management units.**

Modify the Unit 1C and Unit 4 boundaries as follows:

Unit 1C: that portion draining into Stephens Passage and Lynn Canal north of Cape Fanshaw and south of the latitude of Eldred Rock, including Berner's Bay, Sullivan Island, **Pleasant Island, Porpoise Islands**, and all mainland portions north of Chichagof Island and south of the latitude of Eldred Rock, and excluding drainages into Farragut Bay.

Unit 4: All islands south and west of Unit 1C and north of Unit 3, including Admiralty, Baranof, Chichagof, Yakobi, **and** Inian [, AND PLEASANT] Islands and all seaward waters and lands within three (3) miles of the coastlines.

**What is the issue you would like the board to address and why?** Shift the boundary between Unit 1C and 4 to include Pleasant and Porpoise Islands in Unit 1C

Pleasant and Porpoise Islands are much more closely related ecologically and geographically with the Gustavus Forelands (Unit 1C) than with Chichagof Island (Unit 4) to the south. Pleasant Island is a small island approximately one mile south of Gustavus. Porpoise Islands are a very small series of islands east of Pleasant Island. For management purposes, current big game regulations for the remainder of Unit 1C are more appropriate for Pleasant and Porpoise Islands than Unit 4 regulations.

Pleasant Island is an important source of deer for the community of Gustavus. From RY2014 to RY2018 hunters harvested five deer total (range 0-4) on Pleasant Island. During the previous five-year period (RY2009 – RY2013), 152 deer (range 8-56) were harvested. Winters have been mild which can result in greater dispersal of deer across the landscape contributing to variability in harvest. Wildlife can move freely between Pleasant Island and the Gustavus Forelands. The distance between Pleasant Island and the mainland is approximately 0.65 mile (~1 km).

Deer hunting regulations for Unit 4 allow residents and nonresidents to harvest six deer annually between August 1 and December 31. Antlerless harvest is allowed after September 15. Federally qualified hunters can hunt through January and may harvest additional deer for any other federally qualified hunter under the federal designated hunter program. Gustavus residents are federally qualified. Harvest under these regulations are currently unsustainable for this island.

Deer hunting regulations for the Remainder of 1C are two bucks for residents and nonresidents from August 1 to December 31 under state regulations and four deer for federally qualified rural residents. Under federal regulations, does are allowed between September 15 and December 31. These regulations are likely unsustainable for Pleasant Island as well, but are currently more suitable than Unit 4 regulations.

Black bears are occasionally observed on Pleasant Island. There is currently no hunting season for black bears in Unit 4. If Pleasant Island was moved to Unit 1C, there would be a black bear season from September 1 to June 30 for both residents and nonresidents.

Wolf seasons and bag limits for wolves are currently identical for Unit 1C and Unit 4 under both hunting and trapping regulations.

Porpoise Islands are a group of very small islands east of Pleasant Island and while not much wildlife occur on these, it is appropriate to include these in Unit 1C.

Adoption of this proposal will require assessment of current customary and traditional findings and amounts necessary for all species for subsistence determinations for both Unit 4 and Unit 1C.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-059)

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## **PROPOSAL 171**

### **5 AAC 92.450. Description of game management units.**

Divide Unit 19A into two subunits as follows:

The description of the eastern boundary of **Unit 19A** will be the same description for the TM680 moose hunt in the ADF&G Hunting Regulations book.

That is – “*The Kuskokwim River drainage downstream from, and including the George River drainage, and downstream from and excluding the Downey Creek drainage.*”

The description of the western, (same), border of **Unit 19E** will be - “*The Kuskokwim River drainage upstream from, and excluding the George River drainage, and upstream from, and including the Downey Creek drainage.*”

**Note:** The Stony Holitna Advisory Committee submitted maps with this proposal which are available on the Board of Game proposal book webpage at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook) or by contacting the ADF&G Boards Support Section at (907) 465-4046.

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

**The division of Game Management Unit 19A into two subunits - 19A West to remain 19A and 19A East to become 19E.**

### **Background Information:**

The Tier II hunt in 19A West and the Closure in 19A East, came about in 2006, primarily because residents in the two areas had/ have fundamentally different views on moose management.

There are two Advisory Committees in 19A –

- Acting in the interests of western 19A - The Central Kuskokwim Advisory Committee (CKAC), representing five villages – Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek.
- Acting in the interests of eastern 19A - The Stony Holitna Advisory Committee (SHAC), representing four villages – Red Devil, Sleetmute, Stony River, and Lime Village.

The existence of two separate Game Management Units will simplify and facilitate wildlife management by ADF&G in each of the new subunits, particularly in regard to moose.

There are several differences between the two areas that offer compelling reasons for the division of 19A.

*This following info is excepting the Lime Village Management Area, LVMA.*

- Although all of 19A is designated as an Intensive Management Area, and qualifies for aerial wolf predator control, this program has been operational only in 19A East since 2009.
- 19A has two identified moose stocks, with two separate harvestable surpluses, which are managed separately by ADF&G.
- 19A East and West have different use patterns from each other.
- There are two separate hunts in 19A- RM682 in 19A East & TM680 in 19A West.
- SHAC and CKAC want these hunts to continue to remain separate.
- The topography of those portions of 19A that is accessible by boat is mainly heavily timbered, upland in the west, and mainly lowlands with both tundra and timber in the east.
- Land ownership is mainly federal and native corporation land in the west, and state and Native corporation land in the east, which has negatively affected the success of predator control programs, due to its prevention on both federal and Native corporation land. *In 2019, the local Native corporation board voted to allow predator control on its lands. This will contribute to the success of the two predator control programs in both 19A East and 19A West.*
- As of the March, 2020 Board of Game meeting, 19A West now has a separate predator control program

**PROPOSED BY:** Stony Holitna Fish and Game Advisory Committee (HQ-F20-032)

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*The Board of Game deferred this proposal from the Interior and Eastern Arctic Region meeting in March 2020. The original proposal was Proposal 64.*

## **PROPOSAL 172**

### **5 AAC 92.530. Management areas.**

Clarify the legal use of highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area (DHCMA) for hunting and trapping. Clarify the use of firearms, and transport of furbearers and trapping bait when trapping in the DHCMA:

- Do hunting restrictions in 5 AAC 92.530(7) allow travelers who exit the DHCMA (e.g. to travel by licensed highway vehicle or other motorized means to Nuiqsut, Anaktuvuk Pass, Bettles, Wiseman, Coldfoot airport, or by snow machine to a homestead outside the corridor) to hunt once they exit the DHCMA?
- Does the definition of “off-road vehicle,” in AS 19.40.210 affect use of a “licensed highway vehicle” and “snow machine” in 5 AAC 92.530(7)?
  - When it is operated off the highway, is a “licensed highway vehicle” in 5 AAC 92.530(7) an “off-road vehicle,” as defined by 19.40.210?
  - Is the prohibition in 5 AAC 92.530(7) on use of motorized vehicles, with exceptions

for use of licensed highway vehicles, snow machines, aircraft and boats consistent with restrictions placed on off-road vehicles and snow machines in AS 19.40.210?

- Does the prohibition on hunting in 5 AAC 92.530(7)(B) also prohibit trapping?
  - If 5 AAC 92.530(7)(B) allows use of firearms for trapping in 5 AAC 92.530(7), is this consistent with the prohibition of hunting with firearms in AS 16.05.789?
- May a trapper or hunter crossing the DHCMA with a snow machine, stop to hunt or trap within the DHCMA, or become “parallel to the right-of-way of the highway” without violation of AS 19.40.210?
- May a trapper or hunter use a snow machine to enter the DHCMA from outside the area and trap or hunt within the DHCMA if the trapper does not travel all the way across the DHCMA?

**What is the issue you would like the board to address and why?** This is a placeholder proposal, intended to solicit public and agency input regarding the interpretation of state statutes and regulations pertaining to the Dalton Highway Corridor Management Area (DHCMA). Clarification is needed, as there is confusion within state government and the public regarding which activities and methods of access are legal within the DHCMA and what changes to 5 AAC 92.530(7) the Board of Game could legally undertake.

Although the above list is not a comprehensive list of issues associated with the DHCMA, the department recommends clarification of these issues in order to give the public the ability to correctly follow the restrictions set out in 5 AAC 92.530(7) and statutes AS 19.40.210 and AS 16.05.789, or to recommend changes to 5 AAC 92.530(7).

Federal access permits are also a consideration on federal lands within the DHCMA. For example, on federal lands in the DHCMA, federally-qualified users may use a snowmachine to trap, but cannot use a snowmachine to transport furbearers they catch or parts of game used as bait because of current language in 5 AAC 92.530(7). Additionally, nonfederally qualified users may obtain a permit to cross federal lands in the DHCMA by snowmachine in order to access property outside the DHCMA, but they may not use a snowmachine to trap in the DHCMA or transport game across the DHCMA. Federally-qualified trappers and nonfederally-qualified trappers who obtain such a permit can use snowmachines on federal land, but not state lands such as frozen rivers, and cannot transport game.

To aid the board in their decisions regarding 5 AAC 92.530(7) and possible conflicts this regulation may have with Alaska Statutes, we provide the relevant statutes below. Regulation 5 AAC 92.530(7) prior to the March 2019 Board of Game meeting is also included. The most recent board changes to 5 AAC 92.530(7) will be provided when they are available to the department.

**Regulation 5 AAC 92.530. Management areas.** The following management areas are subject to special restrictions:

...

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24–26 extending five miles from

each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area;

(B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway Corridor Management Area is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no motorized vehicle may be used to transport hunters, hunting gear, or parts of game, within the Dalton Highway Corridor Management Area, except that

(i) licensed highway vehicles may be used on the following designated roads:

(1) Dalton Highway, (2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the trail is open for winter travel, (3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open, (4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility, (5) the Sagavanirktok River access road two miles north of Pump Station 2, and (6) any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;

(ii) aircraft and boats may be used;

(iii) a snowmachine may be used to cross the management area from land outside the management area to access land on the other side of the management area;

(D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area

...

**Alaska Statute Sec. 16.05.789. Prohibition on hunting adjacent to highway between Yukon River and Arctic Ocean.**

(a) Hunting with firearms is prohibited north of the Yukon River in the area within five miles on either side of the highway between the Yukon River and the Arctic Ocean.

(b) A person who violates this section is guilty of a class A misdemeanor.

**Alaska Statute Sec. 19.40.210. Prohibition of off-road vehicles.**

(a) Off-road vehicles are prohibited on land within the highway corridor. However, this prohibition does not apply to

(1) off-road vehicles necessary for oil and gas exploration, development, production, or transportation;

(2) a person who holds a mining claim in the vicinity of the highway and who must use land in the highway corridor to gain access to the mining claim;

(3) the use of a snow machine to travel across the highway corridor from land outside the

corridor to access land outside the other side of the corridor; this paragraph does not permit the use of a snow machine for any purpose within the corridor if the use begins or ends within the corridor or within the right-of-way of the highway or if the use is for travel within the corridor that is parallel to the right-of-way of the highway; or

(4) a person who must use land in the highway corridor to gain access to private property that

(A) is located outside the corridor; and

(B) has an established history of use as a homestead.

(b) Nothing in this section authorizes a person to access the land of another person unlawfully.

(c) In this section, “highway corridor” or “corridor” means land within five miles of the right-of-way of the highway.

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

(HQ-F19-152)

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*The Board of Game deferred this proposal from the Interior and Eastern Arctic Region meeting in March 2020. The original proposal was Proposal 63.*

### **PROPOSAL 173**

#### **5 AAC 92.530(7). Management areas.**

Repeal the Dalton Highway Corridor Management Area as follows:

Repeal 5 AAC 92.530(7) in total. Present language does not mirror all of the restrictions in Alaska Statute 19.40.210 causing confusion among hunters and enforcement. Present language in codified:

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24-26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area.

(B) the area within the Prudhoe Bay Closed Area is closed hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no motorized vehicle may be used to transport hunters, hunting gear, or parts of game, within the Dalton Highway Corridor Management Area, except that

(i) licensed highway vehicles may be used on the following designated roads:

(1) Dalton Highway,

(2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce the trail is open for winter travel,

(3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including the gravel pit access road when the gate is open,

(4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility,

- (5) the Sagavanirktok River access road two miles north of Pump Station 2, and any constructed roadway or gravel pit within one-quarter mile of the Dalton Highway;
- (ii) aircraft and boats may be used
- (iii) a snowmachine May be used to cross the Management area from land outside the management area to access land on the other side of the management area
- (D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area;

**What is the issue you would like the board to address and why?** REPEAL (7) the Dalton Highway Corridor Management Area. The restrictive regulations codified are unnecessary and confusing to the public and law enforcement. The guiding restrictions are clear in AS 19.40.210. Hunting regulations should refer to the statute. Conflicts arise from federal agency management for federally qualified rural Alaskans to the detriment of Alaskans who are subsistence hunting. The statutory limits prevail so let's use the instead of re-creating some of them.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (EG-F19-116)

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# Reauthorization of Antlerless Moose Hunts and Brown Bear Tag Fee Exemptions for other Regions

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## PROPOSAL 174

### **5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 1C.

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

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 1C, Berners Bay drainages	Sept. 15 – Oct. 15 (General hunt only)	Sept. 15 – Oct. 15
1 moose by drawing permit only; up to 30 permits may be issued		
...		
Unit 1C, that portion west of Excursion Inlet and north of Icy Passage		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 100 permits may be issued	Nov. 10 – Dec. 10 (General hunt only)	Nov. 10 – Dec. 10

**What is the issue you would like the board to address and why?** Antlerless moose hunts have been authorized for the Berners Bay and Gustavus moose populations in Unit 1C for over a decade. Those hunts were instituted as tools that could be used to manage both populations to within carrying capacity of the limited habitat in each area and to offer additional harvest opportunity as warranted. Antlerless hunts have been periodically and successfully used in both areas but must be reauthorized each year.

**Berners Bay:** The Berners Bay (Unit 1C) strategic moose management plan calls for a post-hunt population of 90 moose based on the area's estimated carrying capacity. The Department o Fish

and Game (department) has been successful at maintaining the Berners Bay population close to the post-hunt population objective by implementing both bull and cow hunts.

From 1998–2006 the number of drawing permits for Berners Bay moose ranged from 10 bull and 10 antlerless permits to 7 bull permits and no antlerless permits. The average annual harvest of bulls during that period was 7 moose, and in years when antlerless permits were issued, the annual harvest averaged 4 cow moose. Although the department has authorization to issue a total of 30 permits each year, no more than 20 total permits have been issued during a single year. Several severe winters from 2006 – 2009 resulted in overwinter mortality and population declines. No Berners Bay moose permits were issued from 2007–2013.

The number of drawing permits issued annually for Berners Bay is based on the number of moose observed during winter aerial surveys. The mean number of moose seen during aerial surveys conducted from 1990–2006 was 77 (range: 59–108). The number of moose seen on surveys declined during consecutive severe winters from 2006–2009 and with only 33–62 moose seen during surveys from 2007–2009. Since 2010 most winters have been moderate to mild and the population has recovered. Under ideal survey conditions in 2012, 102 moose were observed, including 21 bulls, 81 cows, and 14 calves. Since 2012 the moose population has been stable. The department was unable to complete a survey during the winter 2019/2020, but snow conditions were some of the deepest since the harsh winter of 2006/2007. The most recent survey was February 2019 when a total of 106 moose were observed, including 2 bulls, 26 cows, 13 calves, and 65 adult moose of unknown sex. Based on that survey and sightability of collared moose, the population was estimated to be 137 +/- 23 moose. Since 2012 the moose population in Berners has been stable and even though we received heavy snow during the 2019/2020 winter it came later in the year and the impacts to the moose population are expected to be minimal. Moose management is expected to be the same this coming year as it has been since 2012.

Berners Bay is almost entirely federal land. In 2018 the Federal Subsistence Board established a federal moose hunt in Berners Bay requiring 25% of the available hunting opportunity to be reserved for federally qualified hunters residing in Units 1-5. Those same federally qualified users also remain eligible for Berners Bay permits issued through the state draw permit system. The federal hunt was first held in fall 2019, and two of the seven available permits were issued to federally qualified hunters leaving 5 permits available for the State hunt. In 2020 the state plans to offer 6 permits while 2 permits will be issued to Federally qualified hunters. All permits will be for bulls only.

The department maintains management authority over the Berners Bay population and would like to retain the ability to implement an antlerless moose hunt should the population or habitat conditions warrant that type of management.

**Gustavus:** The Gustavus moose population (Unit 1C) rapidly expanded from just a few animals in the 1980s and early 1990s to a peak of about 400 animals in 2003. In 2002 the department estimated the density of moose on the Gustavus Forelands winter range exceeded 5 moose per km<sup>2</sup> despite only a small proportion of the area consisting of productive (abundant willow) winter habitat. In response to concerns about moose damaging the winter habitat, the department initiated spring browse surveys in 1999 and determined that an unsustainable level (85% - 95%) of the current annual growth of willow twigs had been consumed by moose.

To conserve winter habitat the department requested the board authorize an antlerless moose hunt, and the first antlerless hunt was held in the fall of 2000. From 2002– 2008 hunters harvested between 11 and 67 antlerless moose annually, depending on the number of permits issued. No hunt was held in fall 2007 due to high moose mortality during the severe winter of 2006-2007, and no antlerless hunts have been held since 2009.

The objective of antlerless moose hunts in Gustavus is to maintain the moose population using the winter range to levels commensurate with habitat capability. Based on aerial surveys corrected for sightability and annual browse surveys, management of the population using antlerless hunts has been successful. In 2013, under favorable survey conditions 186 moose (25 bulls, 121 cows, and 40 calves) were observed. The population estimate corrected for sightability was 323 +/- 87 moose. Under poor late winter survey conditions in March 2014 91 (24 cows, 12 calves, and 55 unknown) moose were seen yielding a sightability corrected population estimate of 244 +/- 98 moose. Due to exceptionally mild winter weather, at the time of this survey, a number of radiocollared moose had already transitioned to forested summer range outside the survey area. There was little snow cover during the winter of 2014–15, so no survey was attempted. A moose survey was completed in February 2020 and observed 91 moose (1 bull, 10 cows, 13 calves, and 67 unknown sex). The resulting population estimate was 188 ± 56 moose. This is slightly lower than the winter 2018 estimate of 218 ± 22 moose.

Severe winters from 2006 through 2009 reduced calf survival, but since then calf survival has improved. Even during severe winters survival of adult females remained high at about 89%. Given the improved survival rate of calves during successive mild winters and stable cow survival, the potential exists for the Gustavus moose population to rapidly increase.

The Gustavus moose population is currently at a level the department believes is appropriate for the available winter habitat. However, it is important to retain the ability to implement antlerless hunts should the population increase to a level that is detrimental to the habitat.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-069)  
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## **PROPOSAL 175**

### **5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose hunt in Unit 5A, Nunatak Bench as follows.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(3)		
Unit 5(A), that portion south of Wrangell - Saint Elias National Park, north and east of Russell and Nunatak	Nov. 15 - Feb. 15	Nov. 15 - Feb. 15

Fiords, and east of  
the east side of East  
Nunatak Glacier to  
the Canadian Border  
(Nunatak Bench)

1 moose by registration  
permit only; up to 5  
moose may be taken

**What is the issue you would like the board to address and why?** The Nunatak Bench (Unit 5A) hunt area is managed as a separate population because it is generally isolated from other moose populations by fiords and glaciers. The area is subject to severe winters and has low capability to support moose relative to other moose habitat in Unit 5A. The purposes of this hunt are to provide opportunity as the population allows and to maintain the number of moose within a level the limited habitat can support. This hunt opens after other moose hunts in the unit have closed, and it is a popular alternative for hunters who were unsuccessful during those hunts. Because much of the open season for this hunt takes place after bulls have dropped their antlers, either sex may be harvested.

The Nunatak Bench strategic moose management plan calls for a post-hunt population of no more than 50 moose. During an aerial survey in 2001 52 moose were seen. From 2005 through 2012 only 11 – 14 moose with 1 or 2 calves were seen during surveys. The decline in moose numbers following the 2001 survey may be related to the 68-foot rise of Russel Fiord flooding and damaging habitat when it was blocked by the surging Hubbard Glacier during 2003. Due to poor weather and the remoteness of the location this area was not surveyed again until December 2015 when a total of 14 moose (3 bulls, 2 cows, 3 calves, and 6 unknown) were seen. A series of severe winters from 2006 through 2012 may have inhibited recovery of the population. Anecdotal reports from hunters indicate that wolves in the area may also be inhibiting recovery of this small population.

From 1997 through 2004 an average of 12 either sex permits were issued annually with an average of 4 people hunting each year. During that period a total of 15 moose (9 bulls, 6 cows) were harvested for an average of about 2 moose per year. No permits have been issued and no moose have been harvested in this area since 2004.

The department believes it is important to retain the ability to implement an antlerless hunt in this area to prevent habitat damage should the population increase. The department will continue to monitor this population as conditions allow, but we do not plan to issue hunt permits until the population reaches at least 25 moose.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-070)  
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**Proposal 176**

**5 AAC 085.045(4). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 6C.

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued; or	Sept. 1-Oct. 31 (General hunt only)	No open season.
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 of Fish and Game 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 2018 yielded an estimate of 677 moose, 32% 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, there has not been a state antlerless hunt since RY99. The department would like to retain the ability to implement an antlerless moose hunt should the population or habitat conditions warrant it.

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

(HQ-F20-066)

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## **Proposal 177**

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

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(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 (department) 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 December 2016 aerial composition count of moose in the Twentymile, Portage, and Placer river drainages found 153 moose with a bull:cow ratio of

30 bulls per 100 cows and a calf:cow ratio of 18 calves per 100 cows. Since 2016, there has not been enough snow in early winter to conduct surveys.

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 a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. The moose population will be healthier and more productive due to decreased stress levels associated with winter food shortages. This hunt has been successful in creating additional moose hunting opportunity with little or no controversy.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-062)

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### **Proposal 178**

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

Reauthorize the antlerless moose seasons in Unit 14C as follows:

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(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—Mar 31 (General hunt only)	Sept 1.—Mar 31
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

...

Remainder of Unit 14(C)

1 moose per regulatory year, only as follows:

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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
1 bull by drawing permit only, by bow and arrow only; up to 10 permits may be issued	Oct. 20—Nov. 15	No open season

...

**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 starvation during severe winters.

These hunts have also been successful in providing additional moose hunting opportunities in the state's human population center with little controversy.

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 from a combination of population census, composition surveys and extrapolation to unsurveyed areas. Since 2013, a lack of snow has limited the ability to conduct surveys, however there is no indication from either harvest or roadkill numbers that the moose population has changed significantly.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-063)  
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### **Proposal 179**

#### **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:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
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 exceed the management objective.

During the most recent moose survey, Department of Fish and Game staff counted 118 moose on Kalgin Island in February 2020. This count exceeded the population objective of 20–40 moose. In

the last 10 years, an average of 122 permits were issued for this hunt; of which 87 permittees hunted, with an annual harvest of 30 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.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-064)

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### **Proposal 180**

#### **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).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay		
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 accompanied 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 15C for the 2020-21 hunting season.

In February 2017, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in a population estimate of 3,529 moose (95% CI: range 2,769–4,289), of which 19% (95% CI: 14–24) were calves. This equates to a density of approximately 3 moose/mi<sup>2</sup> in the census area. Density estimates for the winter are difficult to determine because the areas available to moose vary depending on snowfall, but winter density is consistently higher. Fall composition counts in core count areas during December 2019 provided a bull ratio of 40 bulls:100 cows.

The Homer bench land in Unit 15C, which encompasses the hunt boundary of DM549, contains high densities of moose in winters when deep snow drives moose into human populated areas. 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 24 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 if they pose a threat to highway vehicles. On average, 62 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 based on snow conditions.

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

(HQ-F20-065)

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## **PROPOSAL 181**

### **5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.**

Reauthorize the resident antlerless moose season in Unit 18 as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(16) ...		
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:		
2 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	
2 antlerless moose; or	Oct. 1—Nov. 30.	
2 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 of Game meeting in Bethel. Both of these antlerless hunts were amended at the BOG meeting in 2020 in Nome. The Board has previously reauthorized the antlerless moose season for resident hunts in Unit 18 remainder for regulatory year (RY) 2016 through RY2020. This proposal requests reauthorization for RY2021.

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 17,000 animals with calf:cow ratios ranging from 65:100 to 75:100, and twinning rates from 20% to 50% for all areas. Population growth continues to be strong in this portion of Unit 18 and anecdotal evidence suggests that calf survival rates remain high. The population is expected to continue to grow with high recruitment and adult survival.

Although the current year harvest data in the Remainder of Unit 18 has not been finalized due to the early proposal deadline, we expect harvest to be similar to the past 4 years and well within 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 moose population in the Goodnews River drainage had grown steadily in the past 15 following a closure in 2004. The fall hunt has had a quota of 10 in the first few years of the hunt and recently increased to 30. The season has not been closed by EO and the past few years the quota was not met. In the two years that the winter hunt has been held, harvest has been low (only 5 killed in RY2017 and none in RY2018). The population now is over 300 moose and based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Goodnews River Drainage.

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

(HQ-F20-047)

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## **PROPOSAL 182**

### **5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during February in a portion of Unit 19D as follows.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(17)

...

Unit 19(D) East, those portions of the Kuskokwim River drainage within 19(D) upstream from the Selatna River drainage, but excluding the Black River drainage

#### **RESIDENT HUNTERS:**

...

1 moose, by registration permit only, a person may not take a cow accompanied by a calf

Feb 1 – Last day of Feb.

...

**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 moose population in Unit 19D East has approximately doubled since predator removals began in 2003. The Department of Fish and Game is starting to observe decreasing nutritional status as indicated by declining twinning rates. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. By 2019 ratios had declined again and the two-year average was 18 bulls per 100 cows.

To maintain a healthy and productive moose population, department research (Boertje et al. 2007) indicates that when the two-year average twinning rate is 11–20% populations should be stabilized. Twinning rates in Unit 19D East remained high until 2015; however, the current 2-year average twinning rate is now 16%, indicating a decreasing nutritional status in this population. The current

Intensive Management plan for Unit 19D East calls for to stabilization of the population through harvest when the -year average twinning rate is between 15 and 20%.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-036)  
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**PROPOSAL 183**

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

Reauthorize the antlerless moose seasons in Unit 20A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
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(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
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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 shotgun, crossbow, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order
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<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
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...

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
---	-----------------

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 shotgun, crossbow, 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 in meeting IM harvest objectives without reducing bull-to-cow ratios to low levels. 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 9,581–13,959 moose (90% confidence interval) in 2019. This estimate falls within the IM population objective. The department does not want the population to further increase because of concerns density effects. The department will monitor Unit 20A calves for twinning rates below 20% and short yearling weights below 400 pounds to detect density dependent issues. Therefore, the intention is to harvest moose at a rate of 1% of the population which has been shown to stabilize the moose population at its current level. Antlerless harvest will be by drawing permits for a majority of Unit 20A and a registration permit outside the nonsubsistence area in northwest Unit 20A near Nenana. The harvest objective will be based on the most recent survey results.

The number of moose in Unit 20A was estimated at 17,768 (2.6 moose/mi<sup>2</sup>) 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/mi<sup>2</sup>) 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 2019 population estimate is within the IM objective.

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

(HQ-F20-038)

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## **PROPOSAL 184**

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

Reauthorize the antlerless moose seasons in Unit 20B as follows:

<b>Units and Bag Limits (18)</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
...		
Unit 20(B), that portion within Creamer's refuge		
...		
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	Sept. 1–Nov. 27	Sept. 1–Nov. 27
1 antlerless moose by muzzleloader 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	Dec. 1–Jan. 31	Dec. 1–Jan. 31
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	Sept. 1–Nov. 27	Sept. 1–Nov. 27

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
1 moose by targeted permit only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
Unit 20(B), that portion within the Minto Flats Management Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by registration permit only	Oct. 15– Last day of Feb.	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	
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.	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.	No open season.

<b>Units and Bag Limits</b>	<b>Resident Open Season Subsistence and General Hunts</b>	<b>Nonresident Open Season</b>
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	No 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	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. Furthermore, subsistence hunters in the portion of Unit 20B in the Minto Flats Management Area may not have a reasonable opportunity to pursue moose for subsistence uses.

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. Subsistence hunters will have reasonable opportunity to harvest cow moose. 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 within 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. To maintain the current population level the department recommends limited antlerless hunts in the Minto Flats Management Area (MFMA) and the Fairbanks Management Area (FMA). The department will continue to monitor the moose population and may implement additional antlerless hunts if the population continues to trend upward.

*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 pose 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, presumably, in part due to consistent antlerless moose harvests.

*Minto Flats Management Area (MFMA)*—The primary purpose of this antlerless hunt is to provide a reasonable opportunity for subsistence uses and to regulate the moose population in the MFMA.

The MFMA moose density was high in 2010 (4.4 moose/mi<sup>2</sup>). To reduce the moose population, the harvest of antlerless moose during RY12 and RY13 was about 2.5% of the population. The fall 2015, 2017, and 2019 estimates showed more appropriate densities of 1.6, 1.7, and 2.0 moose/mi<sup>2</sup>, respectively. Because the population level has been stable and within the population objectives, the antlerless harvest has been reduced to approximately 1% of the total population to maintain the current population level.

*Targeted Hunt*—The purpose of the targeted hunt is to allow the public to harvest moose that are causing nuisance or public safety issues. These permits are used sparingly but allow the public to harvest the moose instead of the department just dispatching them.

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

(HQ-F20-40)

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## **PROPOSAL 185**

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

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(18)		
...		
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 by drawing permit only; up to 1,000 permits may be issued in combination with that portion in the Delta Junction Management Area; a person may not take a calf or a cow accompanied by a calf; or	Oct. 10–Nov. 25	
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	
...		
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 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf;

Sept. 1–Sept. 30

Sept. 1–Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

#### RESIDENT 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

...

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25

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

#### 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, and reduced reproductive success; 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. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Additionally, the population may need to be reduced dramatically when new data are available and analyzed.

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 30 years. Total moose harvest in all of Unit 20D averaged 248 moose (an average of 231 bulls and 17 antlerless moose) during regulatory years 2017 and 2018.

Antlerless hunting opportunity is limited at present because this small opportunity helps to maintain the moose population within the ability of habitat to support the population. The largest antlerless harvest (n=113) that occurred recently in Unit 20D was in 2009 when antlerless hunts were newly authorized. The southwest Unit 20D population estimate (approximately 4,000–4,500 moose, with a sightability correction factor applied) and bull harvest in southwestern Unit 20D (226–282) have been stable since 2011. The 2019 population estimate for southwest Unit 20D was 3,647 moose (corrected for sightability) with a density of 2.8 moose per square mile, 31 calves:100 cows and 28 bulls:100 cows.

Antlerless harvest will likely be needed to maintain the population at the optimal density and will help make progress toward the IM harvest objective of 500–700 moose without reducing bull:cow ratios below the management objectives. The population trend and harvest rate suggest the low, consistent antlerless harvest provided by the drawing permit hunts in Unit 20D, in conjunction with other mortality factors (including ceremonial harvest, vehicle collision, accidents, and predation), is an appropriate rate of antlerless moose mortality that contributes to stability in the southwest Unit 20D moose population.

The Department of Fish and Game 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 evaluation of 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.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-42)  
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## **PROPOSAL 186**

### **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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(19)		
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 IM harvest objectives could be compromised. In addition, rather than allow the population to go through dramatic rates of expansion and contraction, it is prudent to dampen the current accelerating rate of increase.

The Intensive Management (IM) harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2009–2018 was 412 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 (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough TCAs) within the Kaiyuh Flats in this hunt area showed a significant increase in moose abundance among

all age classes, and adult moose abundance increased 57% above the 16-year average by 2017. Geospatial Population Estimate data also showed a statistically significant increase 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 and stable twinning rates since 2004.

The portion of 21D affected by this reauthorization is approximately 21% (2,559 mi<sup>2</sup>) of Unit 21D (12,093.6 mi<sup>2</sup>). Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the total moose estimated in Unit 21D. At 10,305 moose ( $\pm 1,546$ ) in 2017, the mid-point for the total 21D moose population estimate was above the IM population objective for all of Unit 21D (12,093.6 mi<sup>2</sup>) of 9,000–10,000 moose.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-44)  
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## **PROPOSAL 187**

### **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.

This moose population is beginning to show signs of nutritional stress. The most current survey in 2019 indicated there are 9,777 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 only approximately 200 moose are harvested each year and there

are additional moose available to harvest. Bull-to-cow ratios are high, with 42 bulls per 100 cows in 2018. The Intensive Management (IM) harvest objective for Unit 21E is 550-1,100 moose.

Within the Unit 21E moose survey area (4,094 mi<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 2.1 moose/mi<sup>2</sup> in 2019. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. The 2-year average twinning rate in the Holy Cross area is 12%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 32%. The current intensive management plan calls for stabilizing the population through harvest when the 2-year average twinning rate is 15–20%. Browse utilization is high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-045)  
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## **PROPOSAL 188**

### **5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in the western portion of Unit 26A as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(24)		
...		
Unit 26(A), that portion west of 156° 00' W. longitude and excluding the Colville River drainage.		
1 moose; a person may not take a calf or a cow accompanied by a calf	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.

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, moose counts have observed 145 moose and 218 moose in 2015 and 2018, 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 of Fish and Game recommends 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.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-049)  
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## **PROPOSAL 189**

### **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 Eastern Arctic) 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, 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 resident tag fees that were in place prior to 2010 appeared to have little effect on harvest rates in these areas.

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

(HQ-F20-051)

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## **PROPOSAL 190**

### **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. We recommend 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 7 years; Unit 22, where the tag fee has been exempted for 17 years; Unit 23, where the tag fee has been exempted for 12 years; and Unit 26A, where the tag fee has been exempted for 7 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 17-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, we estimate 0–3 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.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F20-061)  
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## **Proposed Changes Outside the Board of Game's Authority**

The Board of Game (board) does not have authority to adopt the requested changes in the following proposals. They are included in the book for review, comments, and discussion at the applicable board meeting.

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*Note: The Board of Game does not have authority to establish and change fees for permits and applications.*

### **PROPOSAL 191**

#### **5AAC 92.037(g)(10). Permits for Falconry.**

**Current regulation:** The department may, in its discretion, establish additional permit requirements necessary to administer this program.

#### **Suggested condition of nonresident permit under 5AAC 92.037(g)**

##### **Nonresident Falconry application and permit fees**

Permit and application fees for the nonresident take of raptors program are as follows:

##### **Item**

##### **Nonresident Fee (Per Person)**

Non-Refundable Lottery Application Fee

\$50

Nonresident Permit Winner Fee

\$250

To maintain a fair and equitable system for allowing nonresidents to take a raptor under provisions of 5 AAC 92.037 and to provide for a cost recovery process for the administration of the nonresident falconry permit application process by the department, the following conditions apply to the lottery process for nonresident falconry permits:

A non-refundable application fee of \$50 is required for each applicant to apply for a nonresident permit to take and export a raptor from the State of Alaska under 5 AAC 92.037(g).

The permit application fee must be paid by credit card, check or money order - checks and money orders must be in U.S. funds drawn on a U.S. bank. Cash will not be accepted.

Applicants are allowed to submit one application per year. If more than one application is submitted, all applications submitted by that applicant will be invalid and the applicant will forfeit all application fees.

False or incorrect information on an application voids the application.

Any application that is illegible or has incomplete information will be invalid.

Any credit card charges that are denied or checks returned for insufficient funds will void the entire application.

Any rejected, revoked or ineligible application will forfeit the application fee.

Applications cannot be accepted in person. They must be submitted online or mailed to the address listed on the application. Applications must be submitted online by March 1 or if mailed, they must arrive at the department's Anchorage office by March 1.

A successful applicant is ineligible to apply for a nonresident permit the following calendar year. Example: if an applicant won a 2021 nonresident permit to take a raptor, that applicant cannot apply again until the 2023 calendar year.

The fee for a successful nonresident applicant to take a raptor is \$250. ADF&G must receive this fee by April 15 or the applicant will forfeit the permit.

The department annually administers the nonresident falconry permit application process. The administration of this process takes a considerable number of man hours each year for the permit biologist who manages the applicant's qualifications, contacts the applicants home state falconry coordinator, issues export permits to nonresident falconers, and makes phone calls to each successful applicant as required under the targeted hunt system; the team that collects the data and administers the drawing permit process; and the regional area biologists who must check out the successful applicants, identify and photograph the captured raptor and complete the checkout process required to issue the export permit.

Under current regulation, there are no fees assessed to nonresident falconers to apply for a permit or take a raptor under this section. 5 AAC 92.037 (a) a permit and valid hunting license is required for taking, transporting, or possessing a raptor for falconry or for practicing falconry in this state. This proposal requests that the Board of Game implement these fees in a cost recovery process. This request is reasonable, equitable, and in line with other programs administered by the department that provide cost recovery for staff time and resources expended directly as a result of administration of those programs. Other department managed and co-managed projects where cost recovery fees are applied include McNeil River and Stan Price bear viewing areas, and all big game drawing permit applications. All applicants who successfully draw a big game hunting permit for the current year are precluded from applying for the same drawing permit the following year.

**What is the issue you would like the board to address and why?** 5 AAC92.037. Permits for Falconry. Cost recovery for the administration of the nonresident falconry permit program by the Alaska Department of Fish and Game.

**PROPOSED BY:** David Lorring

(EG-F20-005)

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*Note: The Board of Game does not have administrative, budgeting, or fiscal powers.*

## **PROPOSAL 192**

### **5 AAC 92.047. Permit for using radio telemetry equipment.**

As a successful wolf trapper here in Southeast Alaska, I strive to catch fur when it is prime and in its best condition. I recently caught 2 collared wolves here in Southeast Alaska. While I am all for research, I am also strongly against the ruining of a prime winter wolf fur. Especially as it applies to collared wolves which tend to be one of the most valuable highly prized furs in Alaska. When a researcher collars a wolf in Alaska it undoubtedly leaves a collar mark in which little to no fur remains under the three to four-inch-wide collar. This rub in the fur length and quality downgrades the value of the fur to a potential buyer or taxidermist significantly.

My suggestion and hope is that the commissioner's Office would advise researchers when they are setting out their budgets for a study or project concerning collared wolves and or wolverine that they would put some kind of funding into their budget which is usually comes from grant money so as to reimburse trappers for the damage caused by these collars to the animal's fur. I would think 250 to \$500 is what the damage caused by a collar does to a wolf hide. I have talked to other trappers around the state who have caught colored wolves and they feel the same way, that the research project does indeed ruin the resource of this highly prized fur. As a trapper I don't think it's too much to ask that the researchers put money into their budget to account for this. The odds of a trapper catching the wolf are fairly minimal. Obviously that would change in an area where there are higher numbers of wolves being collared. Researchers already are spending exorbitant amounts of money for the collars (which is usually federal grants matched based off of trappers, license sales ammo, gear, etc). A researcher spends approximately 2 to \$5,000 per collar plus the deployment and maintenance on these types of projects. It's not uncommon for a researcher to fly with a helicopter pilot for several days and amass a hefty bill. As a trapper I feel that research is important but I also am frustrated having seen first hand the damage that collars do to the fur quality of highly prized and valued fur bearers. I am a member of the Alaska Trappers Association and have talked with several of the leaders of our organization and they agree that this is a step in the right direction of proper resource management done without bias. Regards, Jesse Ross

**What is the issue you would like the board to address and why?** State and federal researchers use radio collars on wolves to study them. The fur is danged around the neck. The radio collar being worn around the neck ruins their prime winter fur. I propose that ADF&G compensate trappers \$500 upon return of a collar from a radio/gps collared wolf. Though trappers recognize the value of wolf studies, the collars currently in use damage fur in the neck area while in use. As such, trappers are being forced to suffer economic hardship and should be compensated as such. I feel that a policy compensating trappers for damaged fur caused by research collars would represent a goodwill gesture from both state and federal agencies.

**PROPOSED BY:** Jesse Ross

(EG-F20-117)

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