

Central/Southwest Region

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- 47 Open a nonresident caribou season in Unit 17B with certain conditions.
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- 60 Exclude National Park Service lands from certain wolf hunting and trapping regulations.
- 61 Modify the intensive management plan for the North Alaska Peninsula Caribou herd.

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- 68 Increase the number of people per group who can apply for the Copper Basin community subsistence harvest hunt.
- 69 Increase the any bull quota for the Copper Basin community subsistence harvest hunt.
- 70 Establish general harvest moose hunts for nonresidents in Unit 13.
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- 73 Repeal the exclusive hunting restriction for Tier I caribou in Unit 13.
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- 78 Open Unit 13D to brown and black bear baiting.
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- 81 Modify the moose population and harvest objectives for Unit 13.
- 82 Modify the wolf population objective under intensive management for Unit 13.
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- 85 Establish a predator control plan in Unit 11.
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- 90 Modify the resident sheep hunt and bag limit for Unit 13.
- 91 Change the Dall sheep bag limit to full curl, convert the draw hunts to general hunts for Units 13 and 14A, and limit nonresident allocation.
- 92 Modify bag limit to full curl in Units 14A and 13D.

Palmer Area – Units 14A, 14B, and 16

- 93 Reauthorize the drawing permit hunts for antlerless moose in Unit 14A.
- 94 Modify the season and/or bag limit for moose hunting in Unit 14A.
- 95 Require moose hunters in Unit 14A to submit jaw bone and antlers to ADF&G.
- 96 Establish a winter antlerless moose hot-spot hunt in 14B and reauthorize the winter antlerless moose hunt in Unit 14A.
- 97 Reauthorize the antlerless moose hunt on Kalgin Island in Unit 16B.
- 98 Modify the moose hunting season dates in Unit 16A.
- 99 Align the resident and nonresident moose season dates in Unit 16B.

- 100 Close the nonresident season in the Unit16 intensive management area.
- 101 Prohibit hunting with off road vehicles in Unit 16B until after 3:00 am following the day riding.
- 102 Establish a drawing permit hunt for caribou in Unit 14A and a winter season that can be offered if harvest opportunity exists.
- 103 Review and modify the Unit 16 intensive management program and the progress that has been made towards meeting the program's objectives.
- 104 Prohibit the snaring of bears in the Central/Southwest Region.
- 105 Prohibit the snaring of bears in the Central/Southwest Region.
- 106 Open Unit 16 to brown bear baiting for residents and nonresidents in the spring and fall.
- 107 Retain the current no closed season for brown bear in the remainder of Unit 16B.
- 108 Suspend/relax the intensive management of wolves in Unit 16.

Regional and Multiple Units

- 109 Open resident hunting seasons ten days before nonresident seasons, allocate 90 percent of drawing permits to residents; remove guide requirements, and increase tag and permit fees for Central/Southwest Region Units.
- 110 Open resident sheep seasons seven days before nonresident seasons for the Central/Southwest Region Units.
- 111 Open resident sheep seasons seven days before nonresident seasons for Central/Southwest Region Units.
- 112 Open resident sheep seasons five days before nonresident seasons for Central/Southwest Region Units.
- 113 Open resident sheep hunting seasons five days before nonresident seasons for the Central/Southwest Region.
- 114 Open resident hunting seasons seven days before nonresident seasons for Central/Southwest Region Units.
- 115 Limit sheep drawing permits to ten percent for nonresidents for Central/Southwest Regions.
- 116 Limit drawing permits to ten percent for nonresidents for Central/Southwest Region Units.

- 117 Allocate 90% of drawing permits to residents for Central/Southwest Region hunts and exclude nonresidents in hunts with less than ten permits
- 118 Develop a permit allocation formula for second degree of kindred hunters in Units 10, 13, and 14.
- 119 Open coyote hunting year round in the Central/Southwest Region Units.
- 120 Close the taking of coyotes on National Park Service lands during summer months and reduce the bag limit in the Central/Southwest Region.
- 121 Prohibit the taking of wolves March through November in the Central/Southwest Region.
- 122 Reauthorize the brown bear tag fees for the Central/Southwest Region.

Interior Region

- 123 Reauthorize the antlerless moose seasons in Units 19D, 20A, 20B and 20D.
- 124 Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.
- 125 Create a youth hunt for Fortymile caribou.

Statewide

- 126 Prohibit some pack animals from being used for big game hunting.

ALASKA BOARD OF GAME
Central/Southwest Region Meeting
(Game Management Units 9, 10, 11, 13, 14A, 14B, 16 & 17)
February 8 – 15, 2013
Best Western Lake Lucille Inn
Wasilla, Alaska

~TENTATIVE AGENDA~

NOTE: This Tentative Agenda is subject to change throughout the course of the meeting. This Tentative Agenda 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. Persons wishing to testify must sign-up by the deadline. Public testimony will continue until those present at the meeting are heard; the board will continue working through its agenda immediately upon conclusion of public testimony. The following time blocks are only an estimate.

Friday, February 8, 8:30 AM

OPENING BUSINESS

Call to Order

Introductions of Board Members and Staff

Board Member Ethics Disclosures

Purpose of Meeting (overview)

AGENCY REPORTS

PUBLIC AND ADVISORY COMMITTEE TESTIMONY (upon conclusion of staff reports)

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

Saturday, February 9, 8:30 AM

PUBLIC AND ADVISORY COMMITTEE TESTIMONY Continued

BOARD DELIBERATIONS (Upon conclusion of public testimony)

Sunday, February 10 – Friday, February 15, 8:30 AM

BOARD DELIBERATIONS Continued

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business (Upon conclusion of deliberations)

ADJOURN

Special Notes

A. This agenda is TENTATIVE and subject to change during the meeting. A list of staff reports and a roadmap will be available at the meeting. Scheduled updates will be available on the Board of Game website.

B. Meeting materials are available at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo or by contacting the ADF&G Boards Support Office in Juneau at 465-4110.

C. A live audio stream for the meeting is intended to be available at: www.boardofgame.adfg.alaska.gov

D. 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 January 25, 2013 to make any necessary arrangements.

Dillingham Area – Unit 17

PROPOSAL 45 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Change hunting regulations for the Mulchatna Caribou Herd (MCH) in Units 9A, 9B, that portion of 9C within the Alagnak River drainage, 17, 18, 19A and 19B. Under this proposal, hunting for Mulchatna caribou would change from the general hunt to a registration hunt. Seasons and bag limits would be aligned within the range of the Mulchatna Herd.

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(3)		
Unit 9(A) and that portion of Unit 9 (C) within the Alagnak River drainage		
RESIDENT HUNTERS: 2 caribou by registration permit; however no more than 1 bull may be taken and no more than 1 caribou may be taken from Aug. 1-Jan. 31	Aug. 1 – Mar. 15	
NONRESIDENT HUNTERS:		No open season.
Unit 9(B)		
RESIDENT HUNTERS: 2 caribou by registration permit; however no more than 1 bull may be taken and no more than 1 caribou may be taken from Aug. 1-Jan. 31	Aug. 1 – Mar. 15	
NONRESIDENT HUNTERS:		No open season.
Unit 9(C), that portion north of the Naknek river and south of the Alagnak River drainage		

...

If the department determines that Mulchatna Herd caribou have largely replaced Northern Peninsula Herd caribou, **2** [3] caribou may be taken by registration permit only during a winter season between Jan. 20 and Mar. **15** [31] to be announced by emergency order

(Winter season to be announced)

NONRESIDENT HUNTERS:

No open season.

...

(12)

Unit 17(A), all drainages east of Right Hand Point

RESIDENT HUNTERS:
2 [1] caribou **by registration permit** may be taken during a season to be announced by emergency order

(Season to be announced)

NONRESIDENT HUNTERS:

No open season.

Remainder of Unit 17(A)

RESIDENT HUNTERS:
2 caribou **by registration permit**; however no more than 1 bull may be taken and no more than 1 caribou may be taken from Aug. 1-Jan. 31

Aug. 1 – Mar. 15

NONRESIDENT HUNTERS:

No open season.

Unit 17(B), that portion in the Unit 17(B) Nonresident Closed Area

RESIDENT HUNTERS:
2 caribou **by registration permit**; however no more than 1 bull may be taken and no more than 1

Aug. 1 – Mar. 15

caribou may be taken from Aug.
1-Jan. 31

NONRESIDENT HUNTERS:

No open season.

Remainder of Unit 17(B), and
that portion of Unit 17(C)
east of the Wood River
and Wood River Lakes

RESIDENT HUNTERS:

2 caribou **by registration permit**;
however no more than 1 bull
may be taken and no more than 1
caribou may be taken from Aug.
1-Jan. 31

Aug. 1 – Mar. 15

NONRESIDENT HUNTERS:

No open season.

Remainder of Unit 17 (C)

RESIDENT HUNTERS:

2 [1] caribou **by registration permit**
may be taken during a season to be
announced by emergency order

(Season to be announced)

NONRESIDENT HUNTERS:

No open season.

(13)

Unit 18

RESIDENT HUNTERS:

Aug. 1 – Mar. 15

2 caribou **by registration permit**;
however no more than 1 bull
may be taken and no more than 1
caribou may be taken from Aug.
1-Jan. 31

NONRESIDENT HUNTERS:

No open season.

(14)

Unit 19(A) that portion within
the Lime Village Management

Area

RESIDENT HUNTERS:

2 caribou **by registration permit**; Aug. 1 – Mar. 15
however no more than 1 bull
may be taken and no more than 1
caribou may be taken from Aug.
1-Jan. 31

NONRESIDENT HUNTERS:

No open season.

Units 19(A) and 19(B) within
the Nonresident Closed Area

RESIDENT HUNTERS:

2 caribou **by registration permit**; Aug. 1 – Mar. 15
however no more than 1 bull
may be taken and no more than 1
caribou may be taken from Aug.
1-Jan. 31

NONRESIDENT HUNTERS:

No open season.

Remainder of Units 19(A) and
19(B)

RESIDENT HUNTERS:

2 caribou **by registration permit**; Aug. 1 – Mar. 15
however no more than 1 bull
may be taken and no more than 1
caribou may be taken from Aug.
1-Jan. 31

NONRESIDENT HUNTERS:

No open season.

...

ISSUE: This proposal changes hunting regulations for the Mulchatna Caribou herd by changing the hunt structure from a general caribou hunt using a harvest ticket to a registration permit hunt in units 9 A, B & C, 17, 18 and 19A and B. The Department of Fish and Game also submitted an Agenda Change Request to the Board to include Game Management Units within the range of the Mulchatna Herd that was not on the call for proposals (Units 18, 19A, and 19B).

The Mulchatna Caribou Herd is presently under Intensive Management regulations, with predator control activities conducted in the major calving areas. Hunting seasons have remained open throughout most of the range of the herd as hunting mortality has not been considered an important factor in slowing herd growth. However, harvest reporting in some areas where Mulchatna caribou are taken remains problematic. Changing to a registration hunt throughout the herd's range would allow the department to better assess hunter harvest as well as the results of the Intensive Management program. In addition, the improved reporting will provide more information when responding to in-season requests to alter season dates and bag limits. The board and department have received regular requests from the public to extend the hunting season and requests from federal agencies to shorten or close the season. Improved reporting will allow the board to better address these concerns and ensure harvest opportunity is not lost.

WHAT WILL HAPPEN IF NOTHING IS DONE? Inaccurate harvest information will continue to be obtained.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? It is anticipated that more accurate harvest information will be obtained which will allow for better herd management and evaluation of the progress made towards achieving intensive management objectives.

WHO IS LIKELY TO BENEFIT? A better understanding of caribou harvest will enable managers to more effectively manage this herd.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050412652

PROPOSAL 46 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Modify the caribou hunting season dates in Unit 17 as follows:

Close the caribou season in Unit 17 during the month of October and extend the season from March 15 to March 31. Bag limit would remain the same.

ISSUE: Harvesting caribou during the rut; and extending the season closing date from March 15 to March 31. Harvest of caribou during the rut when the meat is less desirable for human consumption is not the preferred time to hunt.

WHAT WILL HAPPEN IF NOTHING IS DONE? Prior to moving the season back from April 15, local hunters were accustomed to harvesting caribou in the spring to replenish their freezers after moose and fish were consumed. The month of April is the preferred time to put up dry meat while it is warmer but before the flies come out. When the season was moved back one month, local hunters lost opportunity to harvest caribou during the spring caribou migration. Along the Nushagak River, hunters wish to harvest caribou later in the spring while they are in closer proximity to the villages and reducing cost.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, closing the season during October will reduce waste. Caribou in rut does not taste good. Subsistence hunters do not hunt during the time when the caribou are in rut.

WHO IS LIKELY TO BENEFIT? Local watershed hunters.

WHO IS LIKELY TO SUFFER? Those hunters who hunt caribou during the rut for “trophies.”

OTHER SOLUTIONS CONSIDERED? Extending the season back to April 15. Though March 31 was a good compromise. When the Mulchatna Caribou Herd rebuilds, then we can reconsider lengthening the season again back to what it was before.

PROPOSED BY: Nushagak Advisory Committee EG041812533

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

PROPOSAL 47 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a nonresident caribou season in Unit 17B with certain conditions as follows:

Caribou hunting for nonresidents will be allowed on a limited basis on a guided hunt only basis. There will be no unguided hunts for nonresidents allowed to maintain excellent trophy selection and no more over harvest of caribou cows, calves, and subpar bulls. Tags will be sold at the rate of two tags per contracting outfitter who is licensed in a Guide Use Area at the price of \$1,000/tag. The tags being sold in this manner will greatly limit the number of caribou being taken and still allow some caribou hunting to keep hunting this area of Alaska on the minds of sportsmen from other parts of the country/world. The resulting nature of the tags will increase demand for Unit 17 as destination for trophy caribou hunters.

ISSUE: I would like to address the continued ban on nonresident caribou hunting. I have seen an increase in number of quality bulls in the field. It is time for nonresidents to be allowed to hunt them on a very limited basis.

WHAT WILL HAPPEN IF NOTHING IS DONE? There will be continued pressure on the other caribou herds in Alaska causing the same fate as the Mulchatna Caribou Herd. Sportsmen from across the globe will lose interest in the area as a hunting destination. This will leave hunters to go to parts of Canada to get a good quality combination hunt for caribou and brown/grizzly bears. If this problem is not solved, there will be many years of lost income for the outfitters, villages, Alaska businesses who operate in the area.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? My proposal improves the hunting opportunities for both hunters and guides. It also brings in much needed money to the area/state because of the need for hotels, fuel, supplies, air service, tourism, etc. The most important dynamic that will be improved

is limited caribou hunting will recapture the attention of world hunters who are starting to focus their attention to other parts of the world and away from Alaska as a hunting destination. Areas such as Canada, Russia, Greenland, Africa are seeing a surge in demand for their hunts because of the direction the quality of some of the hunts in Alaska has gone in the last 10-15 years. This increase in attention will bring dollars into the area/state to help focus conservation programs from organizations such as the SCI on conserving the Mulchatna Caribou Herd instead of simply looking for a NEW area to send hunters. Limited hunting is better than no hunting for everyone and the resource.

WHO IS LIKELY TO BENEFIT? Hunters from around the world will benefit and so will the guides/outfitters who operate in Unit 17. The villages, and other service providers in the area will also see an increase in revenue and profits. Again, limited hunting is much better than no hunting. Right now we have zero hunting opportunity for non-resident caribou hunters in the area. Businesses all the way back to Anchorage will also see more money coming in from hunters who travel through to the Unit 17 destination. The \$1,000 tag cost will greatly increase the money received by the state and will pave the way for other similar opportunities throughout the state.

WHO IS LIKELY TO SUFFER? Currently, no nonresidents are allowed to hunt caribou in the area. So they won't be negatively affected. Guides in Russia, several provinces in Canada, Africa, and other parts of the Lower 48 will suffer from lost hunter's revenue because hunters will be spending their hunting dollar in Alaska instead of other places.

OTHER SOLUTIONS CONSIDERED? Limited tag lottery drawing would be an alternative solution. The current mind set of Alaskans and Alaska guides is that a limited tag drawing system is evil. This attitude will hamper the Board of Game and/or the State of Alaska from approving the limited tag drawing system do to a concern for political correctness. However, the current situation of no nonresident caribou hunting allowed in the area may make the limited tag drawing system seem like a good alternative because with the limited tag drawing system, hunting would be allowed. To repeat myself one more time, some hunting is better than no hunting; for the profitability of guides, outfitters, service providers, fuel users, etc. Thanks for considering bringing back limited caribou hunting opportunity for nonresident hunters.

PROPOSED BY: Willie Dvorak EG021012516

PROPOSAL 48 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Establish a nonresident registration hunt in Togiak National Wildlife Refuge in Unit 17A as follows:

Units and bag limits	Resident Open Season	Nonresident Open Season
Unit 17(A)		

RESIDENT HUNTERS:

1 bull by registration
; or

Aug. 25 - Sept. 20
(Subsistence hunt only)

1 antlered bull by
registration permit;
during the period
Dec. 1 - Jan. 31, a season of
up to 14 days may be
announced by emergency order

Dec. 1 - Jan. 31
(Subsistence hunt only)
(To be announced)

NONRESIDENT HUNTERS:
That portion within the Togiak National
Wildlife Refuge; one bull with 50 inch,
4 brow tines on one side

[NO OPEN SEASON.]
September 1-20

ISSUE: Moose populations in the Togiak National Wildlife Refuge (TNWR) have been increasing and resident hunting seasons and bag limits are liberal. Most lands near villages are not included in the TNWR so the refuge boundaries were chosen to minimize conflicts with local subsistence hunters. There are many remote areas of the Togiak Refuge that are used very little, if at all by local residents. After a discussion with the Togiak Advisory Committee Chair in 2011, I believe there may be a better boundary line than the Refuge boundary but this would need to be worked out in committee.

During the last board cycle it was explained that even though the moose population has exploded in this area, nonresidents will be excluded until moose in the area exceed their carrying capacity, which they are theoretically quickly approaching. This is the only time I have ever heard a hard number associated with carrying capacity in Alaska moose management. The use of carrying capacity to determine participation in a hunt seems counter intuitive. By definition, when you exceed the carrying capacity, the population will start to decline immediately, therefore falling below the threshold to ever allow participation. In most ungulate management situations biologists strive to not reach the carrying capacity for fear of a weather or disease related crash. I suspect this situation is no different. The season has been liberalized to include any-bull hunts, winter hunts, and cow hunts in past years, all methods to slow the growth of a herd. If these methods are successful in slowing the growth so the carrying capacity is not reached, nonresidents will never be allowed to hunt in this area under the current plan.

WHAT WILL HAPPEN IF NOTHING IS DONE? Nothing, status quo

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCT PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Nonresident hunters that have not had the opportunity to hunt moose in this National Wildlife Refuge, of which they are the trustees.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Include the Portion of TNWR in Unit 18, out of cycle for this meeting

PROPOSED BY: Aaron Bloomquist EG050712687

PROPOSAL 49 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Decrease the bag limit for brown bear in Unit 17B as follows:

The bag limit for all hunters in Unit 17 for brown/grizzly bears is one bear.

ISSUE: The regulations state that there is now a two brown bear bag limit for hunters. It should be changed to one bear per year.

WHAT WILL HAPPEN IF NOTHING IS DONE? Brown bears are arguably the greatest trophy North America has to offer hunters from around the world. If the bag limit is left at two, guides will encourage hunters to take the second animal. This does four things: 1.) Double the kill rate of a trophy animal; 2.) Decrease the perceived/actual worth of brown/grizzly bears as a trophy animal; 3.) Destroy/overharvest the species that best offers outfitters to make a living in Unit 17; 4.) Further eliminate the desire for nonresident/alien hunters to bring money into the area and State of Alaska.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? My proposal improves the quality of the resource of both numbers of brown/grizzly bears and their ability to become huge.

WHO IS LIKELY TO BENEFIT? All outfitters and hunters who hunt in Unit 17 will benefit.

WHO IS LIKELY TO SUFFER? Outfitters who hunt Russia and Canada stand to loose business due to excellent hunting for brown/grizzly bears in Unit 17.

OTHER SOLUTIONS CONSIDERED? Other solutions would be to mandate a payment to the state for the second brown bear taken by the outfitter/hunter to deter taking the second animal. I reject it because of the paperwork involved and the public relations/legal problems that would arise from such a solution.

PROPOSED BY: Willie Dvorak EG020912515

PROPOSAL 50 - 5 AAC 92.200. Purchase and sale of game. Allow the sale of brown bear hides and skulls from Unit 17.

Brown bear hides and skulls may be sold but they must be sealed prior to sale in Unit 17.

ISSUE: Brown bears are very plentiful in Game Management Unit 17. Allow the sale of brown bear hides and skulls.

WHAT WILL HAPPEN IF NOTHING IS DONE? Brown bears are plentiful in Unit 17. Liberalization of bag limit, time and season has not affected brown bear populations, they are still very plentiful and are still increasing in numbers. They predate on moose and caribou, especially during the calving season. In regulation, black bear hides and skulls may be sold but they must be sealed prior to sale. We want to allow the sale of brown bear hides and skulls. This would provide additional economic opportunity hunters.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? It provides economic opportunity for local hunters in Game Management Unit 17.

WHO IS LIKELY TO BENEFIT? Local hunters and hand-crafters.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Nushagak Advisory Committee EG041212526

This proposal was submitted at the request of the Board of Game.

PROPOSAL 51 - 5 AAC 85.015. Hunting seasons and bag limits for black bear. Change hunting regulations for black bear in Unit 17 to a bag limit of three bears per year and no closed season.

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
2		
...		
Unit 17		

RESIDENT HUNTERS:

3 [2] bears

No closed season
[AUG. 1-MAY 31]
(General hunt only)

NONRESIDENT HUNTERS:

3 [1] bears

No closed season
[AUG. 1-MAY 31]

...

ISSUE: The Board of Game requested the Department of Fish and Game submit this proposal to make black bear hunting season and bag limit similar to other areas.

WHAT WILL HAPPEN IF NOTHING IS DONE? Black bear season and bag limits in Unit 17 will remain the same.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Those wishing to take black bears during the summer, or who wish to take more than the current bag limit.

WHO IS LIKELY TO SUFFER? Those hunters in the upper Nushagak River who may wish to see more black bears in the area during the fall when they are taken for food.

OTHER SOLUTIONS CONSIDERED? Leave current season and bag limit.

PROPOSED BY: Alaska Department of Fish and Game

EG050412653

King Salmon Area – Units 9 and 10

PROPOSAL 52 - 5 AAC 85.045 Hunting season and bag limit for moose. Restrict nonresident moose hunting opportunity in Unit 9 as follows:

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

(8)

Unit 9(A) 1 bull by registration permit Sept. 1 - Sept. 15
NONRESIDENT HUNTERS: [No open season]

Unit 9(B)
NONRESIDENT HUNTERS: [No open season]

Unit 9(C), that portion draining into the Naknek River
NONRESIDENT HUNTERS: [No open season]

Remainder of Unit 9(C)
NONRESIDENT HUNTERS: [No open season]

Unit 9(D)
NONRESIDENT HUNTERS [No open season]

Unit 9(E)
NONRESIDENT HUNTERS: [No open season]

ISSUE: Unjustified nonresident hunting opportunity in Game Management Unit 9 during a time of depressed moose populations.

In March 1999, the Board of Game found that moose in Units 9B, 9C, and 9E met the criteria to be considered “important for providing high levels of human consumptive use” under the state’s intensive management law: AS 16.05.255.

Moose populations are mandated by law to be prioritized as a subsistence resource for Alaska residents in times of shortage by AS 16.05.255(13)(d) which states: “the taking of moose, deer, elk and caribou by residents for personal or family consumption has preference over taking by nonresidents.”

The Alaska Supreme Court in *Shepherd v. State, Dep’t of Fish and Game*, 897 P. 2d 33 (Alaska 1995) “the resident preference serves the purpose of conserving scarce wildlife resources for Alaska residents; this unquestionably represents a legitimate state interest.”

Unit 9 (A, B, C, D, & E) have a positive C&T determination and combined ANS of 100 – 140 moose per year. The latest Unit 9 Moose Management Report states the total harvest for the RY

00 to RY 06 reporting period is even more alarming. Nonresidents harvested 656 moose compared to 491 moose by Alaska residents. Local residents only harvested 255 moose during that time! From 2000 – 2006 nonresidents harvested **257% more moose than local residents and 278% more moose than nonlocal residents.**

Resident moose harvest from 2000 to 2006 averaged just 70 moose per year. The Amount Needed for Subsistence (ANS) is 100 - 140 moose per year and tends to be based on local harvest needs only, which is a dismal 36 moose per year during this time frame.

From 2000 to 2006 nonresident hunters had an average 52% success rate, residents, both local and nonlocal, had just a 29% success rate. The ADF&G note the high migratory nature of this moose population. There is no justification to assume nonresident hunter's harvest moose that resident hunters would never harvest. Boat and airplane use is the preferred method of access for residents as well. **Residents may be denied traditional or prime hunting locations by the commercial guiding industry.**

The Board of Game has consistently abused and ignored the intent of the legislature in AS 16.05.255(13)(d) to prioritize moose harvest for residents in a time of shortage. What makes this abuse even more alarming is the fact that the NAPCH caribou herd has been closed to harvest in Unit 9, and the Mulchatna Herd is also severely depressed with restricted hunting, creating a far more significant need by residents for harvesting moose.

WHAT WILL HAPPEN IF NOTHING IS DONE? The intent of the Alaska legislature and Alaska law will continue to be ignored by the Board of Game **to prioritize limited subsistence moose harvest in Unit 9 for residents.**

Such continued abuse by the board when such obvious data sets regarding unjustifiable nonresident harvest are known can only be attributed to the overt influence of the commercial hunting industry in the management of Unit 9's ungulate populations. The Unit 9 working group recommendations continue to highlight that continued unjustified influence. For this "group" to recommend that resident hunters accept a registration hunt while simultaneously continuing nonresident hunting opportunity is beyond any reasonable justification and can only be attributed to the fact that commercial hunting participation level in that ADF&G selected group negatively influenced the Unit 9 working groups recommendations. The ADF&G did not allow the public to participate by phone nor did the department broadcast the meeting over the internet.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, reducing nonessential sport and trophy hunting will enhance the recovery rate of essential subsistence resources and prioritize existing depleted resources for resident harvest to meet the ANS harvest objectives, which complies with legislative intent and state law.

WHO IS LIKELY TO BENEFIT? Alaskans that depend on subsistence resources in areas with depressed game populations. The ADF&G will benefit by having the authorization to limit nonessential human harvest, which is an important component of an effective adaptive management plan that promotes the recovery of depressed subsistence resources.

WHO IS LIKELY TO SUFFER? In the short term, nonresident hunters will lose the opportunity to hunt in areas where resident subsistence need exceeds the amount of available game. In the long run, nonresident hunters will benefit from healthy game populations in the region, especially trophy hunters.

OTHER SOLUTIONS CONSIDERED? Further restricting resident harvest dates and horn restrictions. This was rejected due to the fact that restricting nonresident harvest will provide the necessary harvest opportunity for residents to meet the ANS harvest objectives established by the Board of Game while simultaneously promoting increasing moose populations in Unit 9.

Restricting nonresident hunting to remote subunits or non prime hunting dates. This is unacceptable due to the fact that moose highly migratory in Unit 9. Allowing nonresident harvest in any location will adversely affect resident harvest potential and will reduce the overall recovery rate of the moose population.

PROPOSED BY: Science Now Project EG050912708

PROPOSAL 53 – 5 AAC 85.025(4). Hunting seasons and bag limits for caribou. Establish caribou hunting seasons and bag limits for the Southern Alaska Peninsula Herd in Unit 9D as follows:

Units and Bag Limits	Resident Open season (Subsistence and General Hunts)	Nonresident Open season
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(4)

Unit 9(D)

RESIDENT HUNTERS: [NO OPEN SEASON.]

<u>1 bull by Tier II permit only</u>	<u>Aug. 1—Sept. 30</u> <u>(Subsistence hunt only)</u>
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NONRESIDENT HUNTERS: No open season.

ISSUE: Results of recent surveys show that the Southern Alaska Peninsula caribou herd has made substantial progress towards recovery since targeted wolf removal was implemented between 2008 and 2010. Calf recruitment, fall bull:cow ratios, and population size have all increased markedly since 2007, and the negative population trend has been reversed. Herd recovery is ongoing and harvest is not yet recommended. However, establishing a hunt structure in regulation would expedite the opening of a caribou hunt once the population has recovered sufficiently.

WHAT WILL HAPPEN IF NOTHING IS DONE? Managers will be unable to open the herd to hunting when it has recovered sufficiently to allow for harvest.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Not applicable

WHO IS LIKELY TO BENEFIT? Subsistence caribou hunters

WHO IS LIKELY TO SUFFER? None

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050412650

PROPOSAL 54 - 5 AAC 85.020. **Hunting seasons and bag limits for brown bear.** Modify the brown bear hunting regulations for Unit 9 as follows:

Unit 9A-E: One brown/grizzly bear every year residents and nonresidents, May 1-May 31, and September 1- October 31. Resident registration permit only, no tag required. Nonresident registration permit and tag required.

ISSUE: Lack of ungulate recruitment in Unit 9. Unit 9 has over 1/4 of all the brown bears in the State of Alaska. An attempt to harvest more brown bears was made through a special resident brown bear hunt near villages but was a failure because of the allowable hunting area. In fact it created a more restrictive bear season through a shorter season for all other areas in Unit 9. We have not hunted on the North Peninsula Caribou Herd since the late 90's, yet there are still only around 2,000 animals in this herd. The South Peninsula Herd is even smaller. Moose numbers are vague at best and we are probably headed for a Tier II classification. Predators take up to 85% of moose and caribou calves.

WHAT WILL HAPPEN IF NOTHING IS DONE? Continued or even further reduction in opportunity to harvest moose and caribou.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes Reducing predators will benefit calf recruitment for caribou and moose.

WHO IS LIKELY TO BENEFIT? Hunters dependant on moose and caribou for their families.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Special hunts have already failed. Predator control is compromised because of all the federal land in Unit 9.

PROPOSED BY: Fred Pike

EG043012594

PROPOSAL 55 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Eliminate the village registration permit hunts in Unit 9, allow the taking of nuisance bears, and/or open bear season as follows:

Eliminate the registration permit hunts (RB525). Allow residents of villages to shoot nuisance bears and/or open bear hunting season every year to reduce the number of bears in specific areas while remaining consistent with the policies behind the traditional bear hunting seasons.

ISSUE: Permit regulations: RB525 Pope Vannoy; RB525 Kokhanok Village; and RB525 Pedro Bay Airport.

WHAT WILL HAPPEN IF NOTHING IS DONE? Significant financial harm to contract holders, local small businesses, tourist revenue, Alaska Peninsula Corporation, State of Alaska, hunting practices harmful to local bear population and ecosystem, high rash of trespass issues, high risk of public safety issues.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. By eliminating regulations that cause harm and do not accomplish their objective, we will: 1.) Preserve the good bears for legal, revenue producing hunting and 2.) protect the local bears from the negative consequences to the population and local ecosystem caused by year-round and increased volume of hunting.

WHO IS LIKELY TO BENEFIT? The adjacent village residents, local community (including small businesses), State of Alaska, Alaska Peninsula Corporation, contract holders, local bear population and ecosystem.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED?

PROPOSED BY: Robert Cusack

EG050312638

PROPOSAL 56 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Increase the brown bear bag limit in Units 9 and 10 for the RB525 hunt as follows:

The new established resident registration hunts with a two bear per year limit within a specific distance of the communities in the area. With the tags and tag fee requirement remaining eliminated.

ISSUE: Change the number of brown bear taken from one to two in Units 9 and 10 under the near village RB525 permit.

WHAT WILL HAPPEN IF NOTHING IS DONE? More bear to human confrontations in the villages. The local caribou herd will continue to be decimated.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The local caribou herd will have less of a predator issue and the herd would stand a better chance of survival.

WHO IS LIKELY TO BENEFIT? The residents of the local villages, both safety and a future caribou herd for their subsistence lifestyle.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Defense of life and property. The high cost of time, ammo, cracker rounds and cost of shipping hides.

PROPOSED BY: False Pass Fish & Game Advisory Committee EG050712690

PROPOSAL 57 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Modify the brown bear hunt area for the village registration permits (RB525) in Units 9 and 10 as follows:

Unit 10, False Pass – all lands reaching Swanson Lagoon southeast on Unimak Island to the furthest point of land on the Ikatan Peninsula. Extending inland westerly two and a half miles.

To include lands in Unit 9 on the east side of False Pass from Cape Krenitzin southeast on the Alaska Peninsula to the south side of Sankin Bay. Extending inland easterly two and a half miles.

ISSUE: Change the area of the village brown bear hunt in Units 9 and 10 under the near village RB525 permit.

WHAT WILL HAPPEN IF NOTHING IS DONE? More bear to human confrontations in the villages. The local caribou herd will continue to be decimated.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The local caribou herd will have less of a predator issue and the herd would stand a better chance of survival.

WHO IS LIKELY TO BENEFIT? The residents of the local villages, both safety and a future caribou herd for their subsistence lifestyle.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Defense of life and property. The high cost of time, ammo, cracker rounds and cost of shipping hides.

PROPOSED BY: False Pass Fish & Game Advisory Committee EG050712691

PROPOSAL 58 - 5 AAC 85.020 Hunting season and bag limit for brown bear, and 5 AAC 92.061. Special provisions for brown bear drawing permit hunts. Establish a Katmai Preserve, specific registration hunt for brown bear in Unit 9 as follows:

Establish a Katmai Preserve, specific registration hunt (UCU's 702 & 703):

1. Limit brown bear harvest to one bear every four regulatory years by permit only (resident, nonresident and alien);
2. Define the parameters of the registration hunt in 5 AAC 92.061, modeled on the management structure developed for Unit 8;
3. Establish a harvest limit of 14 – 19 brown bears for Katmai Preserve;
4. No change in season dates is requested.

ISSUE: Unsustainable brown bear harvest in Katmai Preserve.

Katmai Preserve is roughly 645 square miles in size and has a current brown bear population estimated by the National Park Service (NPS) to be approximately 300 brown bears. (Katmai Commercial Hunting Guide Concession Information Pamphlet, May 2011)

The NPS limits nonresident and alien brown bear harvest numbers through a total client limit for the two guided sport-hunting concessions within the preserve.

Currently, the NPS has no control over the number of resident hunters that harvest brown bears in Katmai Preserve. The NPS has stated that approximately 70% of the fall brown bear harvest is by residents of Alaska. Since 1987, 93% of the combined spring/fall bear harvest have occurred in the fall hunting season.

In the spring of 2007, the NPS requested in writing to the Board of Game (board) that the board adopt regulations to maintain a spring/fall brown bear harvest rate of 14–19 bears. The subsequent brown bear harvest that occurred the fall of 2007 and spring of 2008 totaled 30 bears. NPCA's concern increased due to the fact that in the two previous fall/spring brown bear hunts, harvest rates for regulatory year (RY) 2003 totaled 34 bears, and RY 2005 also totaled 34 bears.

In 2011, the board adopted a registration hunt for Unit 9C, but failed to define a specific registration hunt for Katmai Preserve. As well, the board did not adopt a harvest guideline for the registration hunt in Unit 9C as a whole, nor within Katmai Preserve specifically. Concentrated harvest of brown bears can still occur within Katmai Preserve before harvest reports are submitted. The NPS reports that the majority of the harvest occurs the first week of the season, and reporting requirements allow a hunter to wait up to 10 days from the time of harvest before submitting his harvest details to the ADF&G. Emergency orders may be

ineffective in preventing high harvest rates due to conducive weather conditions, or other factors, promoting high harvest rates within Katmai Preserve.

In 2007, the NPS supported a Katmai specific registration hunt with defined harvest guidelines and suggested modeling the hunt on the brown bear hunt management structure for Unit 8, stating: “The NPS is concerned that the current trend of increasing harvest rates for brown bears in Katmai National Preserve cannot be maintained over the long term. This may lead to violation of our Congressional directive in ANILCA to manage for... high concentrations of brown/grizzly bears and their denning areas....” and “conservation of healthy populations of fish and wildlife.” Implementing a registration permit hunt in UCUs 702 and 703 modeled on the brown bear hunt in Unit 8 would address these problems and maintain opportunities for high quality brown bear hunts.”

In addition, in 2011 the ADF&G adopted a no closed season “near village” registration brown bear harvest permit (RB525) to address human bear conflicts. The intent was to relax the harvest restrictions for brown bears along the border of Katmai Preserve, specifically areas with high human use and an estimated high rate of unreported DLP (defense of life and property) harvest. Katmai Preserve bears are a transitory population. Levelok, Iaiugig, and Kokhanok airports, as well as Pope Vannoy Landing, and the Naknek drainage are all in close proximity to Katmai Preserve and open to brown bear harvest year round under RB525. Brown bear harvest under RB 525 could potentially impact brown bear populations within Katmai Preserve. Pending harvest reports for this “new” permit hunt, the BOG should be motivated to adopt a conservative harvest strategy for Katmai Preserve.

NPCA considers the brown bear population in Katmai to be heavily exploited over the last decade when spring/fall harvest rates have been nearly 100% above the NPS recommended level. Pending further investigation, including a formal NPS NEPA evaluation of historical and current brown bear harvest rates, the board must adopt regulations that ensure ecological damage, if it is occurring, is minimized by restricting harvest with Katmai Preserve to a defined harvest limit.

WHAT WILL HAPPEN IF NOTHING IS DONE? The Board of Game will continue to authorize, and the ADF&G will continue to implement, regulations that are inconsistent with documented NPS park purposes and values to conserve brown bear populations for “high density” in Katmai Preserve, including maintaining a natural population composition of age and sex cohorts in the population.

As defined in the current Master Memorandum of Understanding (MMOU) between the NPS and the State of Alaska, the state agreed to abide by federal law and congressional management mandates for lands managed by the NPS in Alaska. The NPS has repeatedly requested that the board adopt regulations ensuring a conservative brown bear harvest in Katmai Preserve pending further scientific investigations.

The state mutually agreed to the following: “To recognize that the taking of fish and wildlife by hunting, trapping, or fishing on certain Service lands in Alaska is authorized in accordance with applicable State and Federal law **unless State regulations are found to be incompatible with documents Park or Preserve goals, objectives or management plans.**” (emphasis added)

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Brown/grizzly bears have low population density and low recruitment, it is very difficult and expensive to estimate population size and trend, and bears may take many years to recover from population reductions. Adopting a preserve specific hunt structure that limits total brown bear harvest promotes long term sustainable harvest surplus for sport and subsistence hunters. The last decades harvest rates cannot continue.

In addition, adopting a conservative brown bear harvest strategy conforms to congressional intent that Katmai Preserve be managed for high densities of bears which conserves the natural sex and age structure of the population to the maximum extent possible.

WHO IS LIKELY TO BENEFIT? The proposed amendment protects NPS park purposes and values, including the highest management value for the nonconsumptive wildlife viewing public where naturally regulated populations of bears and intact ecosystems are promoted to the maximum extent possible. The State of Alaska will benefit by enhancing compliance with congressional intent for the establishment of Katmai Preserve.

WHO IS LIKELY TO SUFFER? Special interest groups who prefer artificial management of ecosystems within Alaska's national preserves.

OTHER SOLUTIONS CONSIDERED? The NPS and NPCA have consistently requested that the board address perceived excess harvest of brown bears in Katmai Preserve. The NPS and NPCA have provided fact based justification for the need to manage the preserve in a preserve specific hunt. The NPS has requested the state cooperation in managing what is widely considered to be America's greatest park for bears.

The fundamental intention of the MMOU between the NPS and State of Alaska is to define guidelines for cooperative management between the state and federal government. Unfortunately, the board has consistently refused to address NPS concerns, comments, and proposals regarding Katmai Preserve.

PROPOSED BY: National Parks Conservation Association EG050912713

PROPOSAL 59 - 5 AAC 92.061. Special provisions for brown bear drawing permit hunts.
Allocate brown bear permits in Unit 10 and establish limits for number of applications allowed per guide as follows:

Limited draw permits for both resident and nonresident hunters in Unit 10, Unimak Island. Number of total permits per area/species based on sustainable yield as defined by the Department of Fish and Game.

A system is already in place and controls total harvest. Percentage of total permits dedicated to residents and nonresidents based on the previous 10 years average percentages of user groups that have applied for permits in the drawing area. According to the Owsichek decision: In

CCDW Fisheries v. Bunker, 775 P2d 1115, 112 n 14 (Alaska 1988), we noted that the public trust doctrine guaranteed fishermen access to public resources for private commercial purposes as well as for recreation. The same rationale applies to professional hunting guides under the common use clause. The common use clause makes no distinction between use for personal purposes and use for professional purposes. Using the previous 10 year average will keep the overall allocation at fair historical use numbers and will support the Common Use Clause since it makes no distinction between personal purposes and professional purposes.

Additional regulations for nonresident guided hunters: Nonresident hunters and contracting guide must sign a guide client agreement. The guide client agreement is a proven tool used in many areas of Alaska. It forms a relationship between the guide and hunter and prevents last minute head hunting and price undercutting by competing guides. Guides must be registered in the guide use area before the end of the drawing application period. Department of Fish and Game office staff checks the occupational licensing database of registered guides prior to the drawing application deadline to make sure that the guide listed on the guide client agreement is registered prior to the application deadline. If that guide is not registered then the client (applicant) is not entered into the drawing. Being registered in the area prior to the end of the application deadline ensures that guides can legally hunt in the guide use area and prevents flooding of the draw from prospecting guides that would not normally register that area. This is a good practice because it increases the odds of drawing a permit, makes the outcome of the draw more predictable so the guide can have a better business plan, and limits conflicts between guides since there will be less guides registered for the area.

The number of applicants per guide cannot exceed the number of nonresident permits available for that species and drawing area. This is also a good practice because it makes the competition for permits fair between guides. This is a fair and reasonable goal since flooding the draw by using a large booking agent only lowers the overall success for all hunters that apply. Guide client agreement must be on file with ADF&G prior to the end of the application period, otherwise application is void. The guide client agreement ensures that a client is associated with guide and that the guide is not submitting more hunters than there are permits available. An alternate list for both residents and nonresidents based on the drawing order with the next applicant eligible should a successful applicant back out of a hunt. This is a reasonable, fair, and obvious way of allocating permits should a hunter need to back out and decline a permit.

Nonresident hunters hunting with a second degree kindred relative are submitted in the resident hunter drawing. Historical averages based on the previous 10 year user group numbers have included nonresidents hunting with second degree kindred as being associated with resident hunter numbers. Changing this allocation will skew the fair percentages of permits to be awarded to residents and nonresidents. Implementing the items above individually will not have the desired effect. They must be implemented together because only then will the full benefit be realized by the system of measured designed meet the overall objective without loopholes that break down the integrity of the design.

ISSUE: Drawing permits for bears on Unimak Island.

WHAT WILL HAPPEN IF NOTHING IS DONE? Hunters may draw permits and not hunt with the outfitter on the guide client agreement. Flooding of the draw will continue which is not a desired guiding practice. Alternates will not be properly allocated. Viable guiding industry on the Unimak may be jeopardized.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? This proposal will improve the quality of product offered by each of the guides submitting clients for the draw and will make for a more predictable drawing outcome that is fair to all and supports the Common Use Clause.

WHO IS LIKELY TO BENEFIT? All hunters will benefit from a better overall experience. Guides will benefit from a more predictable drawing outcome and will be able to offer a better product.

WHO IS LIKELY TO SUFFER? Nobody

OTHER SOLUTIONS CONSIDERED? This solution is used in another part of the state with undisputed positive results.

PROPOSED BY: Mike Zweng EG042112537

PROPOSAL 60 - 5 AAC 84.270. Furbearer trapping, and 5 AAC 85.056. Hunting season and bag limit for wolf. Exclude National Park Service lands from certain wolf hunting and trapping regulations as follows:

Amend the wolf hunting and trapping regulations for lands managed by the National Park Service in Units 9 and 10 as follows:

5 AAC 85.056 (2):

...

Units 9 & 10, Unimak Island

[On lands managed by the National Park Service]

5 wolves per day August 10 – April [JUNE] 30 (Resident and Nonresident)

5 AAC 84.270 (13)

...

Unit 9

[On lands managed by the National Park Service]

No limit October 1 – April [JUNE] 30 (Resident and Nonresident)

ISSUE: The Board of Game (board) should exempt lands managed by the National Park Service (NPS) from liberalized general sport hunting and trapping regulations adopted March 2011 by the board for wolves (*Canis lupis*) in Unit 9.

The Alaska Department of Fish & Game (ADF&G) expedited approval for the implementation of expanded wolf harvest season dates, justifying the action as necessary to promote the objectives of Alaska's intensive management law (AS 16.05.255), stating: "In recognition of the need to reduce wolf predation on caribou in Units 9 and 10, this emergency order uses the Commissioner's authority to extend wolf hunting and trapping seasons until June 30 and eliminates the delay in the implementation of the Board's regulations." (ADF&G Emergency Order April, 2011)

In 2012, the NPS subsequently restricted the state's general hunting and trapping regulations for wolves in Aniakchak, Katmai, and Lake Clark Preserves within Unit 9, citing NPS congressional authority to close or restrict the take of wildlife in preserves if state regulations are found to be inconsistent with park purposes and values pursuant to ANILCA section 1313 and federal regulations found at 36 CFR 13.40 (e) and 13.50.

The 2012 Lake Clark National Park and Preserve Superintendants compendium restricting state wolf harvest regulations noted: "The take of denning wolves sanction practices that have the potential to impact the natural integrity of a native species. The practical effect of these allowances, open to all hunters and trappers, is increased efficiency for taking predator species and has potential to create pressures on the natural abundance, behavior, distribution, and ecological integrity of these native wildlife species. State laws or actions that seek to manipulate natural wildlife populations for human consumption, or have that practical effect, are inconsistent with NPS statutes, regulations, and policies and exceed Congress's authorization of sport hunting in ANILCA."

This proposal seeks to have state regulations comply with current federal regulations.

In further support of the NPS actions taken in 2012, NPS commented to the board dated October 25, 2007, on a proposal to extend wolf hunting seasons in to the summer months: "We [NPS] oppose the proposed season extension for wolf hunting because it could negatively impact the natural process of wolf reproduction. Ballard (Demographics, movements, and predation rates of wolves in northwest Alaska, PhD Dissertation, 1993) observed that packs were "regularly attending dens during May" in northwest Alaska, but noted that wolves in southern Alaska were regularly using dens by late April or early May. Hunting wolves in late spring and early summer jeopardizes pup production and survival."

The Board of Game ignored NPS comments and adopted wolf harvest regulations for summer months.

As defined in the current Master Memorandum of Understanding (MMOU) between the NPS and the State of Alaska, the state agreed to abide by federal law and congressional management mandates for lands managed by NPS in Alaska.

The state mutually agreed to the following: "To recognize that the taking of fish and wildlife by hunting, trapping, or fishing on certain Service lands in Alaska is authorized in accordance with applicable State and Federal law **unless State regulations are found to be incompatible with documented Park or Preserve goals, objectives or management plans.**" (emphasis added)

In March, 2011, the board adopted wolf control regulations under general sport hunting and trapping regulations, which apply to lands managed by the National Park Service (NPS), despite the board having previously adopted an intensive management plan for the region where this type of regulations would have been appropriately applied as an intensive management wolf control regulations, as defined in the current board wolf management policy (2011-185-BOG), which was adopted in 2011 as well and exempted NPS managed lands pending NPS approval.

The current wolf management policy states: “The Board and the Department have always distinguished between wolf management and wolf control.”

Methods the Board Will Consider When Implementing Wolf control Programs

- 1) Expanding public hunting and trapping into seasons when wolf hides are not prime.

The board also clearly identified wolf control regulations as complying with Alaska’s intensive management law: “More commonly, the Board may implement wolf control to comply with Alaska Statutes (AS 16.05.255) where ungulate populations are declared “depleted”...”

WHAT WILL HAPPEN IF NOTHING IS DONE? General sport hunting and trapping regulations will be unnecessarily complex and difficult for a hunter or trapper to access and understand which may lead to unintentional violations of NPS harvest restrictions.

Restrictions on state hunting and trapping regulations on NPS managed lands should be clearly identified in the states yearly hunting and trapping regulations booklet to promote broad public awareness of legal harvest regulations for wolves in Unit 9, including all harvest regulations variations between state and NPS managed lands.

The state will not be honoring the agreements found in the current MMOU between the NPS and the State of Alaska in which the state agreed to exclude NPS managed lands from state regulations found to be inconsistent with NPS park purposes and values.

The state will be ignoring congressional intent regarding the passage of ANILCA: “(t)he standard to be met in regulating the taking of fish and wildlife and trapping is that the preeminent natural values of the park system shall be protected in perpetuity and shall not be jeopardized by human uses. These are very special lands and this standard must be set very high: the objective for park system lands must always be to maintain the health of the ecosystem and the yield of fish and wildlife for hunting and trapping must be consistent with this requirement.” (congressional record)

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Promoting sustainable harvest regulations consistent with sound scientific management principles and the conservation of wildlife promotes a sustained harvestable surplus opportunity for sport and subsistence consumptive use. Restricting harvest to times of the year when pelts are in “prime” condition promotes the highest trophy value for sport hunters, and the highest economic return for trapping and subsistence use.

WHO IS LIKELY TO BENEFIT? Sport and subsistence hunters and trappers will benefit from long term sustained harvest opportunity. The proposed amendment protects NPS park purposes and values, including the highest management value for the non-consumptive wildlife viewing public where naturally regulated and intact ecosystems are promoted to the maximum extent possible. All who value ethical, humane, fair chase harvest principles for the consumptive take of wildlife on lands managed by the NPS in Alaska. The State of Alaska will benefit from improved compliance with the intent of ANILCA.

WHO IS LIKELY TO SUFFER? Special interest groups who prefer artificial management of ecosystems within Alaska’s National Preserves.

OTHER SOLUTIONS CONSIDERED? The NPS and NPCA have consistently requested that the board exempt NPS managed lands when state and federal management objectives differ. The fundamental intention of the MMOU between the NPS and State of Alaska is to define guidelines for cooperative management between the state and federal government. Unfortunately, the board has consistently refused to address NPS concerns, comments, and proposals.

While hunting and trapping is an appropriate activity which the NPCA supports for preserves in Unit 9, it must be subject to the natural ecological processes that have defined this region for a millennium. At times, there will be lower densities of wildlife in a naturally regulated system requiring limits on human harvest opportunity, especially sport trophy hunting, to minimize ecological risk and to prioritize federally qualified subsistence harvest opportunity.

This may be a necessary component for sustaining the long term integrity of ecosystems with complex, multi-dimensional relationships that were developed with minimal influence from man. Alaska’s preserves are where America puts its trust in nature!

PROPOSED BY: National Parks Conservation Association EG050912714

PROPOSAL 61 - 5 AAC 92.125. Intensive management plans. Modify the intensive management plan for the North Alaska Peninsula Caribou herd as follows.

(m)**Northern Alaska Peninsula Predation Management Area.** Notwithstanding any other provisions in this title, and based on the following information contained in this subsection, the commissioner or the commissioner’s designee may conduct a wolf population reduction or wolf population regulation program in the Northern Alaska Peninsula Predation Management Area:

- (1) the Northern Alaska Peninsula Predation Management Area is established 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** [AREAS INCLUDE] 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 12,825 square miles (33,217 square kilometers);

(2) the discussion of wildlife populations and human use information is as follows:

(A) prey population information is as follows:

(i) the NAP was estimated at 20,000 caribou in the 1940s and again in the 1980s, but has declined to fewer than 3,000 caribou since the last peak population size; the most recent estimate of herd size was 2,000 - 2,500 caribou based on surveys conducted in October 2009;

(ii) the initial decline in population size was attributed to nutritional limitations imposed by a depleted range following the peak in the 1980s; parasites and disease were also suspected to have had a negative influence on the herd's status;

(iii) predator management was considered previously, but was not implemented because nutritional indices indicated that individuals of this herd were experiencing nutritional limitations that might be further aggravated by any attempts to increase herd size; indications of improved condition at this time include increased pregnancy rates, increased neonate weights, and increased calf weights; these changes alone have been insufficient to alter herd status;

(iv) pregnancy rates of cows that were 24 months of age or older increased from 57 percent in 2005 (n=315) to 84 percent in 2009 (n=104);

(v) birthmass of calves increased during the period of 2005 – 2007; - birthmass of male calves increased from 7.7 kg in 2005 (n=26) to 8.0 kg in 2006 (n=19) and 8.6 kg in 2007 (n=28); female calves born in 2005 weighed 7.8 kg (n=15), 7.3 kg in 2006 (n=30), and 8.0 kg in 2007 (n=22);

(vi) female calves captured at 10 months of age weighed 49.9 kg in 2005 and 56.7 kg in 2007; however the small sample size precludes statistical comparison;

(vii) research into calf mortality documented survival rates during the first two months of life that averaged 14 percent during the period of 2005 – 2007 (n=143), which was significantly lower than survival rates observed in several other herds studied in the state; survival during the first two weeks of life has averaged 40 percent and survival from two weeks to two months averaged 34 percent; cause of death during the first two weeks of life was primarily attributed to wolves (43 percent) and brown bears (31 percent); cause of death could not be assessed after calves reached two weeks of life due to logistic limitations;

(viii) calf-to-cow ratios in October averaged 10.3 calves per 100 cows during the period of 2003 – 2009 (range 7 – 16);

(ix) bull-to-cow ratios declined to 19 bulls per 100 cows during the period of 2004 – 2009 despite hunting closures in 2005;

(x) harvestable surplus is estimated to be 0 caribou based on chronic poor calf recruitment and reduced bull-to-cow ratio;

(xi) high levels of consumptive use have been a priority for the NAP; from 1990 – 1998 an average of 724 people reported hunting caribou, harvesting an average of 716 caribou annually; before the closure harvest was [HAS] regulated under the Tier II permit system since 1999;

(xii) state and federal caribou hunts were closed in 2005 due to the continued population decline and low calf recruitment; the closure remains in place as of 2010;

(B) the predator population and human use information is as follows:

(i) wolves are a major predator of caribou on the Alaska Peninsula;

(ii) research into the causes of caribou calf mortality indicates that wolves are typically responsible for 43 percent of the calf deaths during the first two weeks of life;

(iii) wolf density in the Northern Alaska Peninsula Predation Management Area is estimated at seven wolves per 1,000 square kilometers; anecdotal evidence obtained from biologists, pilots, trappers, and local residents indicates that wolves are abundant throughout the area;

(iv) in 2008, the wolf population in the Northern Alaska Peninsula Predation Management Area was estimated to include 200 – 300 wolves and composed of 30 – 50 packs based on habitat type and prey base;

(v) an average of 24 wolves (range of 7 – 50 wolves) have been harvested annually in the Northern Alaska Peninsula Predation Management Area;

(vi) brown bears are an important predator of caribou on the Alaska Peninsula; while brown bears have been known to kill adult caribou opportunistically, brown bears are an effective predator of calves during the first 10 days of life;

(vii) research into the causes of caribou calf mortality indicates that brown bears are typically responsible for 31 percent of the calf deaths during the first two weeks of life;

(viii) brown bears are considered abundant throughout the Alaska Peninsula Predation Management Area; densities range from 100 – 150 bears per 1,000 square kilometers in the Northern Alaska Peninsula Predation Management Area;

(ix) brown bear harvests in the Northern Alaska Peninsula Predation Management Area have averaged 179 brown bear annually from 2000 – 2007;

(3) predator and prey population levels and objectives and the basis for those objectives are as follows:

(A) the intensive management population objective established by the board for the NAP is 6,000 – 15,000 caribou; the intensive management harvest objective is 600 – 1,500 caribou annually; population and harvest objectives have not been met for 15 years; intensive management objectives were established by the board based on historic information regarding population numbers, habitat limitations, human use, and sustainable harvests; the estimated NAP population in October 2009 was 2,000 – 2,500 caribou; hunting seasons for the NAP were closed in July 2005; no legal harvest of caribou has occurred for the NAP since the 2004 regulatory year;

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

(C) 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; the brown bear population objective for Unit 9 is currently being met;

(4) justification, objectives, and thresholds for the management plan are as follows:

(A) justification for the Northern Alaska Peninsula Predation Management Area is based on the board decision to designate the NAP as important for providing high levels of human consumptive use; 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;

(B) the objectives of the program are to achieve a sex and age structure that will sustain the population, provide, for human harvest, and allow for population growth toward objectives; the goal of this program is to reduce the number of wolves in a specified wolf reduction area [AREAS] that demonstrates a history of repeated use by caribou; the [TWO] wolf reduction area is defined all lands that drain into the Bering Sea between the southern bank of the Naknek River in Unit 9(C) and Port Moller Bay in Unit 9(E), encompassing 10,734 square miles (27,802 square kilometers); [AREAS ARE AS FOLLOWS:]

[I] THE NORTHERN WOLF REDUCTION AREA IS DEFINED AS ALL LANDS THAT DRAIN INTO THE BERING SEA BETWEEN THE SOUTHERN BANK OF THE NAKNEK RIVER IN UNIT 9(C) AND THE NORTHERN BANK OF THE MESHIC RIVER IN UNIT 9(E) AND ALL LANDS IN BETWEEN AND INCLUDING ALINCHAK BAY AND KUJULIK BAY, ENCOMPASSING 9,047 SQUARE MILES (23,432 SQUARE KILOMETERS);]

[II] THE SOUTHERN WOLF REDUCTION AREA IS DEFINED AS ALL LANDS IN UNIT 9(E) THAT DRAIN INTO THE BERING SEA BETWEEN THE SOUTHERN BANK OF FRACTURE CREEK AND PORT MOLLER BAY, ENCOMPASSING 1,300 SQUARE MILES (3,367 SQUARE KILOMETERS);]

(C) the commissioner may initiate the reduction of wolf numbers in the Northern Alaska Peninsula Predation Management Area according to the following thresholds;

(i) the caribou population is below intensive management objectives established by the board and caribou harvest objectives are not being met;

(ii) nutrition is not considered to be the primary factor limiting caribou population growth; and

(iii) calf recruitment is an important factor limiting population growth and calf survival during the first four weeks of life is less than 50 percent;

(D) the commissioner may continue to reduce wolf numbers in the Alaska Peninsula Predation Management area until the following thresholds can be met without the benefit of wolf reduction:

(i) the bull-to-cow ratio can be sustained within management objectives and the fall calf-to-cow ratio can be sustained above 25 calves per 100 cows;

(ii) the population can grow at a sustained rate of five percent annually;
or

(iii) harvest objectives can be met;

(E) the commissioner must suspend the wolf reduction program if any of the following conditions are observed, pending further review by the board, to determine if the program can be modified to achieve the objectives of this program before reinstating the program, expect that hunting and trapping by the public specified in other sections of this title may continue and are not subject to this subparagraph:

(i) caribou nutritional indices, as evidence by pregnancy rates, calf or adult body mass, or other condition indices, exhibit a declining trend from current values;

(ii) fall calf-to-cow ratios remain below 20 calves per 100 cows for three consecutive years following the initiation of the wolf reduction program;
or

(iii) the bull-to-cow ratio remains below the caribou population objectives and does not increase for three consecutive years following the initiation of the wolf reduction program; **or**

(iv) the survival rate of calves born in the wolf reduction area is not significantly increased as a direct result of the wolf reduction activities;

(F) the wolf predation management objective for the Northern Alaska Peninsula Predation Management Area is to reduce the wolf numbers in wolf reduction areas within Units 9(C) and 9(E); because wolves will not be removed from all lands within the management area and because logistic limitations prohibit public access to the majority of lands within the management area, the majority of wolves in Unit 9(C) and 9(E) will not be affected by the management activities authorized by this plan; reduction of **predators** [; PREDITORS] by humans is necessary to achieve a sex and age structure that will sustain the herd, provide for human harvest, and allow for caribou population towards objectives; reduction of wolf numbers in prescribed wolf reduction areas is expected to increase caribou calf survival and recruitment and increase the bull-to-cow ratio to management objectives; reduction of bear numbers remains problematic due to the high density of brown bears in Units 9(C) and 9(E), logistical limitations, and competing management priorities for brown bears;

(5) the authorized methods and means used to take wolves 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;

(6) the anticipated time frame and schedule for update and reevaluation are as follows:

(A) for up to 10 years beginning July 1, 2010, the commissioner may reduce the wolf populations in the Northern Alaska Peninsula 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;

(7) other specifications that the board considers necessary:

(A) the commissioner shall suspend wolf reduction activities

(i) when prey population management objectives are obtained;

(ii) when predation management objectives are met; or

(iii) upon expiration of the period during which the commissioner is authorized to reduce wolf numbers in the wolf reduction areas;

(B) the commissioner shall annually close wolf hunting and trapping seasons as appropriate to ensure that the minimum wolf population objectives for Unit 9 are met.

ISSUE: The definition of the Northern Alaska Peninsula Predation Management Area wolf reduction area was originally developed with the assumption that wolf control activities would not be implemented unless the program was also conducted on federal lands. Reduction of wolf predation on federal lands has been viewed as a necessary component of the program because the majority of NAP caribou calving occurs on federal lands and most calves die on federal lands, and calf recruitment is the primary factor limiting population growth. Because of the intention to include federal lands, the regulation originally excluded some state lands in the NAP range to ensure sustained yield of wolves on the Alaska Peninsula.

During the March 2011 Board of Game meeting, the board recognized that wolf reduction activities would not be authorized on federal lands and directed the department to initiate wolf reduction activities on state lands to improve the survival rates of caribou calves born on state lands. Because federal lands are no longer considered part of the wolf reduction area the exclusion of some state lands from the program is no longer necessary to ensure a sustainable wolf population remains in the area. More than 60% of the lands included in the Northern Alaska Peninsula Predation Management Area are NPS or USFWS lands and wolves have extensive areas where they are not subject to intensive management under this program.

WHAT WILL HAPPEN IF NOTHING IS DONE? Wolf reduction efforts will be confined to a smaller area, decreasing the effectiveness of the program.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Expanding the wolf reduction area is expected to increase effectiveness of the program and potentially benefit herd recovery.

WHO IS LIKELY TO BENEFIT? Proponents of intensive management and participants in the wolf reduction program

WHO IS LIKELY TO SUFFER? Opponents of intensive management

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game

EG050412656

Glennallen Area – Units 11 and 13

PROPOSAL 62 - 5 AAC 85.045(11). Hunting seasons and bag limits for moose. Reauthorize the drawing permit hunts for antlerless moose in Unit 13 as follows.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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Unit 13

1 moose per regulatory year,
only as follows:

...

RESIDENT HUNTERS:

...

1 antlerless moose by
drawing permit only; up to 200
permits may be issued;
a person may not take a calf or a
cow accompanied by a calf

Sept. 1 - Sept. 20
(General hunt only)

...

ISSUE: Antlerless moose hunts must be re-authorized annually by the Board of Game. This 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. The first Unit 13 antlerless hunt under this regulation will take place in September 2012; 10 permits were issued for a western portion of Unit 13A only. For 2013, recommended permit numbers and hunt locations will be based on the most recent data, and announced prior to the Board meeting, to ensure adequate public and advisory committee review opportunity. The number of permits issued is projected to be far lower than the 200 allowed by regulation.

Moose in Unit 13 have generally increased at a rate of 3-5% per year in the intensive wolf management area during the past 10 years. As anticipated, moose increased in some portions of the unit faster than others.

Following moose survey results in November 2012, we will have an updated population estimate for Unit 13 as well as preliminary harvest data for 2012-13. Based on these data, we expect to recommend a limited antlerless hunting opportunity only for portions of Unit 13A for 2013-14. No additional antlerless opportunities are expected at this time.

The population objective for Unit 13A is 3,500 – 4,200; the population estimate was 3,530 moose in 2009, 3,490 in 2010, and 3,890 in 2011. These numbers are based on conservative extrapolation of count data and sightability estimates. There is also a good possibility there are more moose in the area that are not included in our estimate. Given the simplistic method of population estimation used in this unit, it is important to incorporate other population performance indicators such as harvest trends. The harvest objective for Unit 13A is 210 – 420. In 2009, the harvest was 268 and it improved to 289 in 2010. The preliminary 2011 harvest is 283. The number of bulls harvested in Unit 13A has more than doubled since 2000 (115 taken). Maintaining a healthy balance of bulls to cows is an important aspect of herd management. The objective for Unit 13 is 25 bulls:100 cows. This ratio has worked well in this unit and provides an adequate proportion of bulls for hunter satisfaction and reproduction. The highest density of moose in Unit 13A is in the western portion of the unit, though the composition was only 22 bulls:100 cows in 2010 (below the objective for the first time since 2003). The number of any-bull drawing permits in the area was reduced from 100 permits in 2010 to 30 permits in 2011 in response to the low the bull:cow ratio. The bull:cow ratio was higher (27:100) in 2011. In the eastern portion of the unit, the bull:cow ratio is higher, at 44:100 (last surveyed in 2010), though the habitat quality and density of moose are much lower. The ability to further increase the harvest of bulls from Unit 13A is limited.

Twinning data from radio-collared cow moose in western Unit 13A also provide productivity information in this area. Between 2008 and 2011, twinning rates have ranged from 26% to 33%, rates consistent with a nutritionally sound moose population. These rates are the highest recorded for this study area (data collection began in 1994).

The number of cows in western Unit 13A is expected to continue increasing given reduced predation. To maintain a healthy density and balance of moose in this area, a limited antlerless harvest opportunity in western Unit 13A may be necessary to slow the growth of this population as it approaches a level that will be sustainable in the long-term. Providing an antlerless hunt opportunity will maximize the annual sustained yield.

Key objectives for this area are to maintain a moose density sufficient to allow for harvest objectives to be met, while maintaining the current relatively high nutritional status of the population.

Intensive management efforts will be adjusted to ensure maintenance of population and harvest objectives concurrent with recommendations from the public, Advisory Committees, and the Board.

WHAT WILL HAPPEN IF NOTHING IS DONE? Portions of the Unit 13 moose population could outgrow available habitat, leading to nutritional stress, lower productivity, and higher mortality. Substantial harvest opportunity could be lost for many years to come. If antlerless hunts are not approved and Unit 13 moose begin to show signs of nutritional stress due to overpopulation, intensive management efforts will need to be curtailed, reducing hunt opportunities for bulls and cows.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes; by keeping the population within objective, harvest can be maximized, while avoiding nutritional stress which leads to increased susceptibility to adverse weather events, predation, parasites and disease.

WHO IS LIKELY TO BENEFIT? All who wish a healthy, productive moose population in the Copper River basin, and those who wish to use moose for human consumption.

WHO IS LIKELY TO SUFFER? Those who disagree with the harvest of antlerless moose.

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050712666

PROPOSAL 63 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the cow moose drawing hunt for Unit 13 as follows:

Eliminate the current cow moose drawing hunt. Establish two new cow moose drawing hunts in Units 13A, 13B, 13C, and 13E. Will be triggered to be offered when the current moose population is above the midpoint of the moose population objective in each subunit. (See related proposal in this booklet submitted by Copper Basin Fish and Game Advisory Committee related to new population and harvest objectives for Unit 13. The hunts will not be offered when the current moose population is below the midpoint of the moose population objective in each subunit. Take up to 1% of total cow moose population yearly in each subunit. It will be for residents only and instructions to take only lone cows with no calves. Zones within the subunit will be defined with no more than 1% of the cow population in each zone to be taken in order to spread out the harvest. There will be two hunt numbers to apply for, the first being a fall hunt (October 1 to October 31), and the second a winter hunt (March 1 to March 31) to allow better access by snow machine to more remote zones of the unit. Permitted must report within 3 days of a kill.

ISSUE: Additional harvest opportunities for cow moose in Unit 13 to take advantage of the increasing moose population in an intensive management area.

WHAT WILL HAPPEN IF NOTHING IS DONE? A resource will go untapped in an area targeted to be managed for abundance.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? With separate seasons from other moose hunts and low numbers of hunters in each zone it should be a fairly low impact type hunt. It should help to balance the harvest and the bull/cow ratio by taking some cows in a previously bull only hunting season.

WHO IS LIKELY TO BENEFIT? Meat hunters will have additional opportunity to harvest a moose.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? The cow hunt currently on the books allows only ten cow moose permits Unit wide and doesn't touch the potential that Unit 13 has considering the current increased moose population of approximately 19,000 as a result of wolf control.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee EG050112608

PROPOSAL 64 - 5 AAC 85.045. Hunting seasons and bag limits for moose, and 5 AAC

92.530. Management areas. Open a youth hunt for moose in Unit 13A as follows:

Create a draw permit youth only hunt for hunters 10 to 17 years of age in Unit 13A for cow moose (only cows without a calf could be taken) with a 10 day season August 5-15. No more than 1% of the cow moose population could be allocated, permit allocation numbers to be determined by the Department of Fish and Game (ADF&G).

Permit hunt conditions can be determined by ADF&G and the Board of Game as per other youth permit hunt conditions and restrictions. The same hunter education requirements currently required for Unit 13 would apply. The same licensing requirements would apply, hunters under 16 years of age not required to purchase a hunting license, hunters over 16 years of age and accompanying adult must have hunting license.

Our recommendations are that all permitted youth hunters must be accompanied by an adult 21 years of age or older and that any cow moose harvested under this permit be counted against the bag limits of the permitted youth hunter and the accompanying adult. Only the permitted youth hunter can shoot, except the accompanying adult can shoot the animal only if it has been wounded and to prevent it from escaping.

We recommend that no other mandates be tied to this permit that attach to the child or accompanying adult such as what other units those persons may hunt for moose that year if unsuccessful.

Keep things as simple as possible, the entire idea of this youth hunt is to allow more children to get involved in hunting with their families and mentors prior to the school term by having a hunt in an area with reasonably good access and a good chance of success, to allow our youth to experience hunting and providing food for their families and to ensure we have a next generation of hunters who will carry on our traditions.

ISSUE: Create a Youth Hunt in Region IV that starts before the school term as required by the Alaska legislature. Currently there are no youth hunts we know of that begin before the school term in Region IV (Central/Southwest). In Anchorage and Fairbanks areas the school term typically begins between August 15-20.

After speaking with the area biologist we believe Unit 13A has a growing moose population and that a small percentage of cow moose (without calves) can be harvested without negatively impacting herd growth or bull:cow ratios. By allocating cow moose only to youth hunters out of this population rather than bull moose we avoid conflicts and concerns from general season hunters that legal bull moose will be taken prior to the general season hunt.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED? The Board of Game would not be meeting the mandate set by the Alaska legislature for youth only hunts that start before the school term. As school begins ever earlier in August and evermore hunts seem to begin later, we are losing youth hunting opportunities and hunter recruitment and ability of families to go hunting together for extended periods.

DOES YOUR PROPOSAL ADDRESS IMPROVING THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED? IF SO, HOW? Yes. The cow moose population in Unit 13A is abundant and some cow moose harvests will help us reach harvest objectives and provide a healthy source of meat to Alaskan families.

WHO WILL BENEFIT IF YOUR PROPOSAL IS ADOPTED? Youth hunters would benefit greatly by having a hunting opportunity prior to the beginning of the school term, which has been starting earlier and earlier in August.

Families would benefit by having more opportunity to hunt with their children prior to the school term, to be out in the field together camping and sharing experiences that are a great part of bonding and creation of memories that last a lifetime.

The hunting community would benefit with the creation of more youth hunting opportunities that help bring new hunters into the fold and recruit young hunters to carry on our hunting traditions.

The Board of Game would benefit by meeting the mandate set by the Alaska Legislature to have a youth hunt in each region that begins before the school term (Note: Anchorage School District classes began on August 16 in 2011, but began on August 21 in 2013.)

WHO IS LIKELY TO SUFFER IF YOUR PROPOSAL IS ADOPTED? Those opposed to antlerless hunts.

LIST ANY OTHER SOLUTIONS YOU CONSIDERED AND WHY YOU REJECTED THEM. Allow for all youth hunters 17 and under to participate, not just 10 to 17 years of age. We felt that 10-17 years of age for this hunt was most appropriate but didn't reject this and if the board would like to also include hunters under ten years of age we would support that.

Allow any moose harvested under this permit to only count against the youth hunter's bag limit. We rejected that idea because we felt this proposal would garner more support if it didn't mean more overall additional moose were harvested and if there was a per-se sacrifice by the accompanying adult to put this moose on his or her bag limit.

Create a youth hunt for other species or sexes in other subunits. Rejected due to population concerns or that it may take from other general hunting harvests or opportunities.

PROPOSED BY: Alaska Chapter Backcountry Hunters & Anglers EG050112620

PROPOSAL 65 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions, and 92.074(d). Community subsistence harvest hunt areas. Modify the Copper Basin community subsistence harvest hunt in Units 11, 12 and 13 as follows.

A. The Board of Game (board) should return to a system whereby it separately reviews each group or community's eligibility to participate in the Copper Basin Community hunt. Each eligible group should be required to independently establish the season, bag limit and quota the group needs for a reasonable opportunity to meet its community-based subsistence pattern of taking and use. The current Community Subsistence Hunt (CSH) was adopted by the board based on the customary and traditional (C&T) community based pattern of use of the eight Ahtna communities named in 5 AAC 92.074(d). The current CSH moose and caribou quotas, and the moose season, are based on these communities; patterns of subsistence taking and use; it was determined that these quotas and seasons were necessary to provide a reasonable opportunity for the pattern of use in these communities. Thus, no further board action is required for these eight communities - the board should retain the caribou and moose quotas and seasons originally adopted for the eight villages.

The board should, however, require other groups and communities that want to participate in the Copper Basin CSH to establish eligibility separately, and if eligible, each group should be required to separately establish the quotas, seasons and other regulations that are necessary to provide a reasonable opportunity for that group. A distinct quota should be established for each group.

The board could accomplish this by providing public notice specifically to each group that has in the past participated in the Copper Basin Community hunt, and to the public at large, that effective for the 2013 hunt, groups seeking to participate in the CSH must present a proposal to the board demonstrating eligibility. A group's proposal should include: 1.) a description of the membership of the group or community; 2.) the area in which it seeks to subsistence hunt (a group may not need to use, or be able to show that it is eligible to use all of the area described in 5 AAC 92.074(d)); 3.) the group's established or intended pattern of community-based subsistence use in the area; 4.) and the quota, season, bag limits and other regulations necessary to provide the group with a reasonable opportunity to satisfy its community-based pattern of subsistence use (eligible groups will have different needs depending on the specific taking and use patterns, the number of members in the group, the sharing pattern, the area where hunting is concentrated, etc.).

In determining eligibility, the board should focus on the group's history and pattern of use in the specific area where the group seeks to hunt. Alternatively, a group without an established pattern of community-based subsistence use in the area should provide the board with specific information and a plan for how it intends to meet the pattern of use identified in the board's 2006

findings for moose and caribou in Unit 13 for the upcoming season. The board should focus on at least three of the criteria used in the 2006 findings when determining eligibility for the group; 1.) the group's dependence on the harvest of a wide diversity of wildlife and fish harvested from the CSH area as a mainstay of the community's subsistence way of life; 2.) the widespread sharing throughout the community of the resources (moose, caribou, salmon, berries, etc.) harvested from the area for subsistence uses; and 3.) the teaching of skills and values of the community's subsistence way of life from generation to generation and the participation of younger people in the hunting, fishing, gathering, preparation, preserving and other skills and values that are essential components of practicing a community-based subsistence way of life.

In order to make this a more objective standard, groups should have to show that the community members will spend at least 30 days in the CSH area focused on collecting a wide variety of resources - salmon, other fish, berries, moose, caribou, birds, small game. The group should also demonstrate that its wild resource harvesting efforts will be focused in this area; that, for example, its members largely rely on this area for salmon, other fish, berries and small game rather than depending on another area for these resources. The reliance on a wide diversity of resources from the area of subsistence use is perhaps the most important criterion of community-based subsistence use - it runs throughout the board's 2006 findings. It goes to the fact that the community-based subsistence use pattern is to use local resources - not to roam across the state in search of a single species here and another there.

Groups should also have to show established or planned programs or other ways that youth are or will be included, and how the teaching and participation from generation to generation will occur. Groups should have to demonstrate how it will practice the pattern of wide spread sharing that will be expected of group members, and this pattern should be consistent with providing for elders and others with need within the community. Widespread sharing is not demonstrated by a single "sharing event."

All of these elements should be established before the group can participate in the CSH. If a group cannot show an already established pattern of C&T community-based subsistence use of the area, then the group should have to provide a plan for engaging in this pattern, and demonstrate how it will verify that its members will live up to the commitments made in the plan presented to the board. Groups like Ahtna, that can demonstrate a long-established C&T pattern of community-based subsistence uses of the area, should have a reporting process that reflects the fact and the fact that this pattern is already engrained as an essential part of the community way of life. A more streamlined application, implementation and reporting process for communities like the Ahtna villages should be authorized. This will lessen the workload for the Department of Fish and Game and the communities while still achieving the intent of the CSH program for the Copper Basin area. Communities or groups without an established pattern of use could be authorized to use the streamlined process after five years of consistently engaging in the community-based pattern of use in the area.

B. The board should clarify that the caribou season for the Ahtna CSH stays open until the CSH quota is filled, and that CSH caribou season does not automatically close when the other Tier I subsistence hunts closes. The board expressed this intent during its 2010-2011 meetings on the CSH for the Copper River Basin. The board should reaffirm this intent. It is essential that the

board do so in order to ensure that the Ahtna communities will have a reasonable opportunity to harvest caribou. Without such a provision, the harvestable surplus of caribou could be taken in a fairly short period of time. If the CSH were to be closed at this point, it would not allow the communities sufficient subsistence hunting opportunity.

C. The board should also consider the following process to ensure that all individuals or families applying to participate in the other Tier I subsistence hunt for moose and caribou in Unit 13 are really engaged in a subsistence pattern of taking and use. If the board were to take this step, it would protect and provide more meaningful opportunity for genuine subsistence uses. It would make administration of the CSH and the individual Tier I hunt easier, more efficient and more consistent. It would also open up far greater opportunity for non-subsistence hunters. Individuals that want to participate in the Tier I individual hunt should have to fill out an application, and an affidavit, showing that their use of moose and caribou in the area is consistent with the C&T use pattern described by the board for Unit 13 in its 2006 findings. The application should reflect a focus on the three criteria as described in section A above. In particular, the application should require individuals to vouch that they will spend at least 30 days in the area (Unit 13) focused on collecting a wide variety of resources - salmon, other fish, berries, moose, caribou, birds, small game; that their wild resource harvesting efforts will be focused primarily in this area; that, for example, the applicant does, or intends to rely primarily on this area for salmon, other fish, berries and small game rather than harvesting these resources in other areas. Similar statements could be required relating to practicing other patterns of use reflected in the criteria and the 2006 findings.

Taking this step, and the others above, could be done only for Unit 13 and the Copper Basin CSH area, because of the nature of hunting pressure and use in this area. Any additional burden on the board and department in implementing these provisions would be significantly reduced over time. Ahtna believes this proposal is consistent with the state subsistence law and lays a foundation for implementing the law in a way that will serve all hunters in Alaska; it will ensure that those who are engaged in subsistence hunting, and who are entitled to the priority and reasonable opportunity provided by the law, are genuinely engaged in a pattern of subsistence taking and use.

ISSUE: The Board of Game took a big step in the right direction in authorizing a community subsistence harvest permit for the Copper Basin; 5 AAC 92.072; 074. Like any new program, however, changes are necessary to ensure that the board's intent is met. The eligibility for groups to participate in the CSH is far too broad resulting in the very real potential for abuse of the process by groups. The process for group reporting and accountability needs to be revised to ensure that groups participating are fully engaged in the community-based pattern of C&T uses identified by the board in its 2006 findings for the area. A more effective system need to be established for setting moose and caribou quotas for eligible groups and communities and it needs to be clear that the quota for caribou does not close at the same time as the other Nelchina hunts, but continues until the communities have had a reasonable opportunity to harvest the community quota.

WHAT WILL HAPPEN IF NOTHING IS DONE? In both the 2011 and 2012 seasons, a large number of groups of 25 or more residents applied for the Copper Basin community

subsistence moose and caribou hunts. A group from as far away from as Juneau signed up for and participated in the community hunts. The application and reporting process did not ensure that these groups were genuinely engaged in the pattern of community-based subsistence taking and use the board identified in its 2006 Findings. As more residents, through the formation of small groups, take advantage of the loopholes in the current community hunt regulations, there is less subsistence opportunity for those communities that genuinely engage in this pattern of subsistence use. There is also less opportunity for other Alaska residents engaged in other subsistence and non-subsistence uses of moose and caribou in this area. The large number of groups currently taking advantage of the system creates problems for enforcement and management of the hunt. For example, the department must set extremely cautious quotas for any bull moose because of the large number of community hunters signed up for the program. The department and enforcement has also instituted an administrative process that is burdensome for genuine community subsistence users but is considered necessary to control the large number of groups that apply.

The community subsistence harvest permit hunt was created by the board to address community-based subsistence needs in the Copper River Basin. It was founded on the legal and factual basis that there is a distinct pattern of C&T community-based subsistence use of moose and caribou in the area identified by the board for the Copper River Basin. Changes are necessary to fulfill this intent. Otherwise, much of what the board sought to achieve is being significantly undermined. For those who want to exploit the process, the CSH process has become a replacement for “game” the old Tier II system the board sought to reform. Or worse, the current process allows those opposed to the CSH for philosophical or other reasons to crash the system and make it meaningless for those living a community-based subsistence way of life to do so.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Providing the opportunity for community and individual subsistence uses intended by the state subsistence law, and the board through its 2006 findings, while ensuring that those engaged in such uses are genuinely engaged in subsistence uses will improve all aspects of the harvest and hunting opportunity in Alaska.

WHO IS LIKELY TO BENEFIT? Those who are currently engaged in, or desire to genuinely begin engaging in a community-based or individual/family subsistence hunting lifestyle will benefit, as will all other hunters who will benefit from greater hunting opportunity through effective implementation of the state’s subsistence law.

WHO IS LIKELY TO SUFFER? It is not the intent of Ahtna that any one should suffer. Hunters who are do not choose to engage genuinely in a subsistence pattern of taking and use will have more opportunity to participate in other non-subsistence hunting opportunities.

OTHER SOLUTIONS CONSIDERED? Ahtna has proposed other changes to the community subsistence hunt regulations that address similar concerns.

PROPOSED BY: Ahtna Tene Nene’ Customary & Traditional Use Committee EG050312629

PROPOSAL 66 – 5 AAC 85.045 Hunting seasons and bag limits for moose; 5 AAC 92.050. Required permit hunt conditions and procedures; 5 AAC 92.052. Discretionary permit hunt conditions and procedures, and 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Repeal the community subsistence harvest hunt and other changes as follows:

Repeal the Community Harvest (Tier I) moose hunt and area. Replace the Tier I permit hunt with a registration general hunt for Alaskan with spike-fork or 50” or greater spread or 3 brow tines on at least one side antler restrictions with a season from September 1 – 20 for areas outside of newly created road corridors in Unit 13. Close hunt by subunit when the harvest objective is met.

Create a road corridor area along the Glenn, Richardson, Denali, Parks, and Tok-cutoff highway within Unit 13. Adopt a weighted drawing moose hunt for Alaskan residents for any bull and/or cow within the newly created road corridor from September 1st – 20th. Conditions for moose drawing hunt: Allow only one permit per household, applicants can not apply for moose permit in any other Unit for that year, all eatable meat taken from the field on the bone.

Nonresident moose hunting by drawing permit for 50” and larger spread or 4 brow tines may occur only after the maximum harvest objective identified in 5AAC 92.108 has been met in the Game Management Unit subunit.

ISSUE: The Board of Game (board) and ADF&G has illegally granted exclusive hunting privileges to a Customary and Traditional (C&T) game population that is actively managed to provide a harvestable surplus above the maximum amount necessary for subsistence (ANS) adopted by the board. AS 16.05.258(b)(2) does not require the board to continue Tier I hunts in order to provide a reasonable opportunity for subsistence. Federal moose harvest on federal lands in Unit 13, parts of Units 20D, 12 and 11 and abundant harvestable surplus due to active predator/prey management in Unit 13 all contribute to providing a reasonable opportunity for subsistence uses.

WHAT WILL HAPPEN IF NOTHING IS DONE? The State of Alaska will be violating state statutes and regulations and numerous Supreme Court decisions governing the allocation of C&T game populations when the harvestable surplus exceeds the maximum ANS Range. The statute, AS 16.05.330, authorizing community hunts is a relic of the 1986 rural priority subsistence law, and violate Article I, Section 1, and Article VIII, Sections 3, 15, and 17 of the Alaska State Constitution. The 1986 rural priority subsistence law was struck down by the Alaska Supreme Court in the 1989 McDowell decision.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, ADF&G staff could annually determine harvest limits by number, sex, and regulate harvest levels in the easily accessible road corridor in order to maintain sustainable bull/cow ratios. Closure of the registration hunt in the remainder of Unit 13 by Emergency Order would prevent habitat damage due to over-browsing.

WHO IS LIKELY TO BENEFIT? The majority of Alaskans who have hunted moose in Unit 13 for decades and young Alaskans who would like to share public resources by gathering a wild food harvest and making it part of their tradition.

WHO IS LIKELY TO SUFFER? Some rural residents who would prefer continuing to have a priority to publicly owned resources on State and private lands under AS 16.05.258(b)(2)

OTHER SOLUTIONS CONSIDERED? Have the Board of Game propose to reclassify Unit 13 a state non-subsistence Area, 5AAC 99.015. The Mat Valley Advisory Committee has submitted a proposal to the Joint Boards the last time they met to reclassify Unit 13 as a state Non-subsistence Area. The proposal was rejected by the Board of Fisheries members 0-7.

PROPOSED BY: Mat Valley Fish & Game Advisory Committee EG053112718

PROPOSAL 67 - 5 AAC 92.050. Required permit hunt conditions and procedures; 5 AAC 92.052. Discretionary permit hunt conditions and procedures; and 5 AAC 92.072.

Community subsistence harvest hunt area and permit conditions. Repeal the community subsistence harvest hunt and conditions and establish a weighted subsistence drawing hunt as follows:

Repeal the Community Harvest (Tier I) hunt and area 5AAC 92.072. Repeal hunt conditions 5AAC 92.050, 92.052. and 92.071. Replace the Tier I permit hunts with one weighted subsistence drawing hunt for Alaskan residents limited to numbers of permits and/or sex of animal necessary to achieve management goals, adopted by the Board of Game, for the Nelchina caribou herd.

ISSUE: The Board of Game (board) and the Alaska Department of Fish and Game (ADF&G) has illegally granted exclusive hunting privileges to a Customary and Traditional (C&T) game population that is actively managed to provide a harvestable surplus above the maximum amount necessary for subsistence (ANS) adopted by the board. The board has adopted a hunt regime under AS 16.05.258(b)(2) that differentiates among subsistence uses based on the notion there are more than one use pattern for Nelchina caribou. Under AS 16.05.258(b)(2) the harvestable portion of the population has to be sufficient enough to provide for ALL subsistence uses. All Alaskans, regardless of what use “pattern” the ADF&G, Division of Subsistence (DOS) have assigned them, qualify for subsistence use if they so choose under AS 16.05.258(b)(2). The board shall provide a preference for subsistence uses, AS 16.05.258(b)(2)(B), again regardless of what use pattern has been assigned to them by DOS, before allowing any resident sport or nonresident hunt.

WHAT WILL HAPPEN IF NOTHING IS DONE? The state and the board will continue violating statues and regulations governing the allocation of C&T game populations when the harvestable surplus exceeds the maximum ANS range of the game population. The statute, AS 16.05.330, authorizing community hunts is a relic of the 1986 rural priority subsistence law, and violate Article I, Section 1, and Article VIII, Sections 3, 15, 17 of the Alaska State Constitution. The 1986 rural priority subsistence law was struck down by the Alaska Supreme Court in the 1989 McDowell decision.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, ADF&G staff could annually determine harvest limits by number and sex. Which would allow harvest levels necessary to assure enough harvest occurs to prevent the herd from out growing its range capacity, causing habitat damage or reduce the quality of health of individual animals in the Nelchina Caribou Herd.

WHO IS LIKELY TO BENEFIT? The majority of Alaskans who have hunted the Nelchina Caribou Herd for decades and young Alaskans who would like to share public resources by gathering a wild food harvest and making it part of their tradition.

WHO IS LIKELY TO SUFFER? Some rural residents who would prefer continuing to have a priority to publicly owned resources on State and private lands during times of abundant harvestable surplus.

OTHER SOLUTIONS CONSIDERED? Have the board propose to reclassify Unit 13 a state non-subsistence Area under 5AAC 99.015 and adopt a weighted drawing hunt for resident Alaskans. This is an action that only the Joint Boards of Game and Fisheries can take. This solution has been proposed before, but rejected by the Board of Fisheries members 0-7.

PROPOSED BY: Alaska Outdoor Council EG043012604

PROPOSAL 68 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions, and 92 .074(d). Community subsistence harvest hunt areas. Increase the number of people per group who can apply for the Copper Basin community harvest subsistence hunt as follows.

5 AAC 92.072(c)(1) a person representing a group of **50 or more** residents or members may apply to the Department of Fish and Game for a community harvest permit by identifying the community harvest hunt areas and the species to be harvested, and by requesting that the department distribute community harvest reports to the individuals who subscribe to the community harvest permit.

ISSUE: Increase the minimum number of people necessary to form a group for the Copper Basin Community Subsistence Harvest Program from 25 to 50 or more residents.

WHAT WILL HAPPEN IF NOTHING IS DONE? Increasing the number required for a community or group will help deter abuse of the community subsistence hunt program (CSH) by those who are taking unfair advantage of the program. Moreover, raising the minimum number of individuals that can form a group from 25 to 50 more accurately reflects the community pattern of subsistence use for the area recognized previously by the Board of Game. The community-based patterns of taking and use of subsistence resources, such as widespread sharing, designated community harvesters and other criteria are far less likely to be practiced in a meaningful and consistent way by a group of only 25 individuals.

In both the 2011 and 2012 seasons, a large number of groups of 25 or more residents applied for the Copper Basin community subsistence moose and caribou hunts. A group from as far away as Juneau signed up for and participated in the community hunts. As more residents take advantage of the loopholes in the current community hunt regulations, it results in less subsistence opportunity for those communities that genuinely engage in this pattern of subsistence use, and in less opportunity for other Alaska residents engaged in other subsistence and non-subsistence uses of moose and caribou in this area. The unexpected large number of groups creates problems for enforcement and management of the hunt. For example, Department of Fish and Game (ADF&G) must set extremely cautious quotas for any bull moose because of the large number of community hunters signed up for the program. The ADF&G and enforcement has also instituted an administrative process that is burdensome for genuine community subsistence users, but is considered necessary to control the large number of groups that apply.

The community subsistence harvest permit hunt was created by the board to address subsistence needs and to create a hunt that would comply with customary and traditional use patterns. Customary and traditional hunting needs are not being met due to the increase of hunters taking advantage of this hunt.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Ensuring the opportunity for community subsistence uses as intended originally by the board will improve all aspects of the community subsistence harvest.

WHO IS LIKELY TO BENEFIT? Those who depend on and live a customary and traditional community based hunting lifestyle will benefit, as was the intent of the community harvest program. Increasing the number of a community group from 25 to 50 should help sort out applicants who truly follow the intent of the program from those who are taking unfair advantage of a program designed for specific purposes.

WHO IS LIKELY TO SUFFER? It is not the intent of Ahtna that any one should suffer. An eligible group who meets the criteria will be allowed to hunt under the CSH program. Hunters who do not meet the criteria and number necessary to form a group of 50, would still be able to hunt under a drawing permit, Tier I and general hunting season. In fact, all hunters will benefit if the community hunt is only available to those truly engaged in that subsistence pattern of use.

OTHER SOLUTIONS CONSIDERED? Ahtna thought about increasing the number to 100 for a group to be formed, but we realize, too, the difficulty for any eligible group in attaining such a high number. Ahtna has also proposed other changes to the community subsistence hunt regulations that address similar concerns.

PROPOSED BY: Ahtna Tene Nene' Customary & Traditional Use Committee EG050312630

PROPOSAL 69 - 5 AAC 85.045. Hunting seasons and bag limits for moose, and 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Increase the any bull quota for the Copper Basin community subsistence harvest moose hunt as follows:

Open Seasons, Bag Limits, Antler Restrictions

Unit 13

Up to 100 bull moose that do not meet general season antler restrictions (“any bulls”) with a hunting season date of August 20 to September 20, and/or spike or fork or 50” antlers, or 4 or more brow-tines on one side, with a season date of August 10 to September 20 can be taken under the Copper Basin Moose CSH hunt.

In addition the Department of Fish and Game should be directed to consult with the affected groups and communities prior to establishing the sub-unit quotas and to give more weight to meeting subsistence uses in balancing population growth versus harvest.

ISSUE: Increase the moose any bull quota to at least 100 in the Copper Basin Community Subsistence Harvest Permit Hunt (CSH) in order to provide the amount necessary to provide for subsistence uses for the communities eligible to participate in the community subsistence hunt.

Copper Basin CSH Groups have increased from 2010-2011 to 20+ groups participating in the community subsistence harvest permit hunt. If the board continues with a community harvest permit system that allows such broad participation by groups without more realistic and enforceable verification that participating groups are genuinely engaged in the customary and traditional pattern of community use intended by the CSH provisions, then more and more hunters and groups will choose to participate in the CSH. Consequently, it will be increasingly more difficult for the Ahtna villages and other legitimate communities and groups to harvest the amount of any bull moose necessary to meet their subsistence needs.

The lack of coordination between state and federal managers 2011 resulted in extremely conservative any bull quotas for some of the sub-units that the Ahtna hunters traditionally rely on most to harvest moose. The federal moose harvest by members of the CSH counts against the Copper Basin Community Subsistence Harvest Permit moose quota. This problem needs to be resolved by the agencies. The community quota should not be restrictively managed because of the communication problems between these agencies.

Direction needs to be provided to the department clarifying the need to provide reasonable quotas in the areas where subsistence hunting has traditionally been conducted by the communities rather than establishing small quotas in the most important areas and larger quotas in far removed inaccessible areas. In 2011, the department determined that the small quotas in important sub-units were met very early in the hunt, long before Ahtna hunters were provided sufficient subsistence hunting opportunity. The Department should engage in a process of consultation about the sub-unit quotas with the affected communities before deciding sub-unit quotas. Moreover, the goal of providing for sufficient subsistence opportunity should be given greater weight versus growing the Unit 13 moose population at the fastest rate when the department is determining allocation of sub-unit any bull moose subsistence quotas.

WHAT WILL HAPPEN IF NOTHING IS DONE? Subsistence users will not be provided a reasonable opportunity. The current any bull moose quota is insufficient to meet subsistence needs, given the way the department is managing eligibility and accountability for groups applying to participate in the community hunt, and the way the quota was divided among the sub-units. In the accessible road hunting areas the any bull moose quota was low, and in the inaccessible areas, such as Unit 13A and Unit 11 the quota for was significantly higher and not reachable, resulting in inadequate opportunity to meet subsistence needs.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Not directly.

WHO IS LIKELY TO BENEFIT? Those communities and groups that are genuinely and verifiably engaged in community subsistence use patterns and depend upon moose to sustain their way of life will benefit.

WHO IS LIKELY TO SUFFER? Those who seek the fastest growth of the moose population despite the loss of subsistence opportunity. Those who seek to participate in the community subsistence hunt without fully committing to and engaging in the C&T pattern of use that defines community-based subsistence uses.

OTHER SOLUTIONS CONSIDERED? Ahtna has several proposals for making the community hunt more responsive to the board's intent in adopting this program and fulfilling the goals expressed in the board's 2006 findings regarding C&T use of moose and caribou in Unit 13.

PROPOSED BY: Ahtna Tene Nene' Customary & Traditional Use Committee EG050312628

PROPOSAL 70 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish general harvest moose hunts for nonresidents in Unit 13 as follows:

General harvest for nonresident moose in Unit 13.

ISSUE: Nonresident moose hunting in Unit 13, currently permit hunts DM335, DM336, DM337, DM338 and DM339.

WHAT WILL HAPPEN IF NOTHING IS DONE? Nonresident hunters will continue to be shut out of an opportunity to hunt in Unit 13 except by very few permits, guide and other service provider lose out on a source of income, the state loses income by not selling tags.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? As it stands a large portion of these tags are not being utilized. When we get more hunters in the field after moose we also have more participation pursuing predators which helps keep the balance. Hunters can also plan more than six months in advance for a hunt.

WHO IS LIKELY TO BENEFIT? Nonresident hunters, service providers, and the State of Alaska.

WHO IS LIKELY TO SUFFER? None.

OTHER SOLUTIONS CONSIDERED? Registration hunt capped at a number determined by ADF&G, expense for state in managing the hunt.

PROPOSED BY: Clint Mayeur

EG042712560

PROPOSAL 71 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a nonresident moose hunt in Unit 13B; close the other Unit 13 subunits to nonresident hunting as follows:

Establish a nonresident hunting season in Unit 13B for moose outside a 5-mile corridor radius on each side of the Richardson Highway, and close other subunits of Unit 13 to nonresident hunting. Unit 13B nonresident hunters:

Unit 13B

Nonresident Hunters:

1 bull with 50-inch antlers or antlers with 4 or more brow tines; on one side by drawing permit only; with up to 150 permits may be issued

Nonresident - Open Season
September 1 - September 20

ISSUE: Establish a nonresident hunting season in Unit 13B for moose outside a 5-mile corridor radius on each side of the Richardson Highway, and close other subunits of Unit 13 to nonresident hunting.

WHAT WILL HAPPEN IF NOTHING IS DONE? Adverse impacts to subunits in Unit 13 will continue to take negative effect on subsistence uses and hunters. This Unit experiences enormous hunting pressure every year. Subsistence hunters are experiencing great difficulty in harvesting a moose in Unit 13 because it is considered a prime hunting area. Unit 13 is a hunter destination for residents and nonresidents alike. Establishing a hunting area in Unit 13B for nonresidents will alleviate hunting pressure Unit 13 for Alaska residents who depend on moose as food source.

We believe that establishing a designated subunit for nonresident hunters will still provide access for them but also, too, allow Alaska residents opportunity to the resource without competing with nonresident hunters for a food source. This is a win-win situation for both Alaska residents and non-residents; both should have a successful hunt since there will be less competition for a limited resource.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Resident and nonresident hunters will benefit. Local business people, who depend on hunters purchasing good and services during hunting season.

WHO IS LIKELY TO SUFFER? No one should suffer. Designated areas will be identified for both sets of hunters-resident and nonresidents.

OTHER SOLUTIONS CONSIDERED? One thought had been to completely end nonresident hunting in all of Unit 13. A more positive solution is recommending a subunit for nonresident hunters with a 5 mile corridor.

PROPOSED BY: Ahtna Tene Nene' Customary & Traditional Use Committee EG050312634

PROPOSAL 72 - 5 AAC 92.050(4)(I). Required permit hunt conditions and procedures.

Repeal the exclusive hunting restriction for Tier I caribou in Unit 13 as follows:

Repeal the regulation that limits hunting moose outside of Unit 13 if hunting caribou in Unit 13 with a Tier I permit. The new regulation would simply remove the requirement to hunt moose in Unit 13 if you have a Tier 1 caribou tag.

ISSUE: The requirement that came out last year that if you hunt caribou in Unit 13 on a Tier 1 tag, that you must hunt moose needs to be rescinded. How do the two even have any relation to one another?

WHAT WILL HAPPEN IF NOTHING IS DONE? Moose numbers will decline, as there is too much hunting pressure on the moose. Most people that hunt caribou in Unit 13 use to hunt their moose in other units. The moose were pushed miles off the highway last year, causing them to congregate in the fall in habitat they were not use to. This will lead to more winter kill, and wolf and bear kills will go up, as the moose are weaker because of the extra hunting pressure in the fall.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, it improves habitat, increases moose populations from over hunting and takes away the moose/caribou link... which I still have no idea how the two animals are linked in this way. Different animals, different habitat, different feed in everyway...

WHO IS LIKELY TO BENEFIT? Hunters that draw a Tier I tag will have the option to hunt moose in any other part of the state. Traditional hunters in Unit 13 will have less competition, and more opportunities to fill their freezers.

WHO IS LIKELY TO SUFFER? I can't think of a single thing that will suffer is this proposal is adopted. I would sure like to know what it is, so I could at least understand the reasoning behind the rule in the first place.

OTHER SOLUTIONS CONSIDERED? What other solution is there? I'm not sure why it was there in the first place.

PROPOSED BY: Claude Bondy

EG042012536

PROPOSAL 73 - 5 AAC 92.050(4)(I). Required permit hunt conditions and procedures.

Repeal the exclusive hunting restriction for Tier I caribou in Unit 13

No more than one Unit 13 Tier I subsistence permit for caribou may be issued per household every regulatory year; the head of household, as defined in 5 AAC 92.050(b), [AND ANY MEMBER OF THE HOUSEHOLD OBTAINING A UNIT 13 TIER I SUBSISTENCE PERMIT IN A REGULATORY YEAR FOR CARIBOU MAY NOT HUNT CARIBOU OR MOOSE IN ANY OTHER LOCATION IN THE STATE DURING THAT REGULATORY YEAR;]

ISSUE: Decoupling the requirement that permit holders of Unit 13 Tier I caribou permits and all household members cannot hunt moose or caribou in another location. This measure has been put in place to reduce the demand for caribou permits, but it has had an adverse effect on habitat and the resource due to exponential increase in moose hunting pressure and degradation of trails from the increased number of off-road vehicles.

WHAT WILL HAPPEN IF NOTHING IS DONE? The habitat will be degraded along the numerous road accessible trail systems such as in the Eureka area from the increased number of hunters pursuing moose. Hunting pressure will be excessive along any trail system within Unit 13. Success rates will drop. The hunting experience will be like combat fishing at Russian River. There are other more robust moose hunting areas such as in the Tanana Valley which would have handled some of the hunting pressure. This is a bad policy used to attempt to reduce demand for subsistence caribou permits.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, absolutely. Success rates will increase because the hunting pressure will decline and there will be a higher bull-cow ratio.

WHO IS LIKELY TO BENEFIT? Moose; more legal bull moose will survive; higher bull-cow ratio. Moose hunters will have a higher success rate with reduced pressure.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Continue status quo. That is not a viable solution because the regulation has been in place for two seasons and the results are apparent: a degradation of habitat, a decline in the hunting experience due to density of hunters, increased pressure on legal moose population and a reduced success rate by moose hunters.

PROPOSED BY: Mat-Su Borough Fish and Wildlife Commission

EG050112616

PROPOSAL 74 - 5 AAC 85.020. Seasons and bag limits for brown bear, and 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Allow the taking of brown/grizzly bear over registered black bear bait stations in Unit 13D as follows:

Allow for the taking of brown/grizzly bear over registered black bear bait stations in Unit 13D with the following conditions: Brown/grizzly bears taken over black bear bait stations will count against the statewide individual bag limit for brown/grizzly bears. No Brown/grizzly bears accompanied by cubs will be taken over registered black bear bait stations in Unit 13D. Brown/grizzly bears taken over black bear bait stations must be reported to the Department of Fish and Game within 5 days of kill. The Department of Fish and Game may suspend taking of brown/grizzly bears over black bear bait stations in Unit 13D by emergency order. Only the hunter who has registered active (actually registered, baited, and hunted) black bear bait stations located in unit 13D for each of the prior three regulatory years may take brown/grizzly bears over that black bear bait station in Unit 13D.

ISSUE: Allow taking of brown/grizzly bears over registered black bear bait stations in Unit 13D. Due to the following problems: Brown/grizzly bears dominate Unit 13D black bear bait stations. They habitually return to the black bear bait stations to feed. Brown/grizzly bears are safeguarded from legal hunting by the dense undergrowth/vegetation and extremely limited visibility common throughout Unit 13D. Brown/grizzly bears decrease hunter opportunity to successfully harvest black bears over registered bait stations. Black bear hunters spend a lot of money to get to their black bear bait stations (driving with increased fuel costs), in purchasing dog food and other “bait” to use at the black bear bait station, in containers to hold the bait, tree stands or ground blinds, and cameras to monitor the bait stations, etc.. Only to find that brown/grizzly bears had eaten all the bait and damaged stands, barrels, and monitoring cameras. Brown/grizzly bears create unsafe conditions-particularly for young hunters and observing children while walking into or sitting at black bear bait stations. Moose populations continue to be low in Unit 13D.

WHAT WILL HAPPEN IF NOTHING IS DONE? Hunters in Unit 13D will abandon black bear hunting over bait altogether due to frustration over dominating brown/grizzly bears over bait stations. Use of bait is the only viable means of consistently harvesting black bears in the densely vegetated black bear habitat common throughout Unit 13D. We will lose an excellent opportunity to introduce young hunters and observing children to outdoor recreation and hunting. Adult hunters will increasingly exclude young hunters and observing children from black bear hunting over bait due to the dangers of running into a brown/grizzly bear while approaching or sitting on black bear bait stations. If hunters start to abandon black bear hunting over registered bait stations in Unit 13D along with the difficulty of hunting opportunity to take brown/grizzly bears due to dense undergrowth and limited visibility, moose populations will continue to be low in Unit 13D. Brown/grizzly bears are taken by black bear hunters in defense of life or property at black bear bait stations. I expect that more occurrences of DLP over black bear bait stations will increase as the brown/grizzly bear populations continue to increase in Unit 13D. Brown/grizzly bears will continue to habituate black bear bait stations.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, allowing the legal take of brown/grizzly bears over

registered black bear bait stations will reduce the number of brown/grizzly bears currently dominating Unit 13D. Reducing the brown/grizzly bear populations in Unit 13D will hopefully allow for an increase in moose populations in Unit 13D. Allowing the legal take of brown/grizzly bears over registered black bear bait stations will also increase black bear hunting opportunities over black bear bait stations.

WHO IS LIKELY TO BENEFIT? Black bear hunters who spend a lot of money to drive to and manage bait black bear bait stations. Alaska residents who hunt moose in Unit 13D. By decreasing brown/grizzly bear numbers in Unit 13D will hopefully increase moose populations in Unit 13D.

WHO IS LIKELY TO SUFFER? In general I don't believe anyone will suffer by this proposal if adopted. Some anti-hunting persons/groups may oppose the proposal on the grounds of hunting in general, but I do not see how they would actually suffer if the proposal is adopted.

OTHER SOLUTIONS CONSIDERED? Leaving the hunting of black bears over black bear bait stations and brown/grizzly bear hunting as it currently is. The problem with this is that every year more and more brown/grizzly bears are negatively affecting black bear bait stations. It is becoming more costly to run a black bear bait station, and more dangerous. Something need to be done to address the problem. By allowing the legal take of brown/grizzly bears over black bear bait stations will slightly reduce the population. The Department of Fish and Game can close by emergency order the taking of brown/grizzly bears over bait at any time they determine enough brown/grizzly bears have been taken in Unit 13D. See if the Department of Fish and Game could get registered black bear bait station hunters to allow them (fish and game) to utilize their black bear stations under a voluntary program coordinated with the hunter to radio collar brown/grizzly bears on black bear bait stations throughout Unit 13D. Try to gather additional information on brown/grizzly bear populations in Unit 13D to see the range of these bears and historical use of black bear bait stations year after year. The problem with this is that it will be an additional cost on the Department of Fish and Game's already limited budget. Will the radio collars work in the dense undergrowth/vegetation of most of Unit 13D? Anytime you have a voluntary program, you have to ask yourself if hunters will actually participate in a program like this. Allow the taking of brown/grizzly bears over black bear bait stations in all of Unit 13. I understand that this may be a bit of a controversial program for some. I know it has been brought up in years past and folks are afraid that it may put an end to all of black bear baiting. I don't agree with this feeling, however I feel that by trying this in subunit 13D specifically will be a good trial for the program. I selected Unit 13D for the reasons listed above in this proposal. Let's see how it works and allow the Department of Fish and Game the opportunity to close it down by emergency order if they see the need to.

PROPOSED BY: Alysia White

EG042912569

PROPOSAL 75 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear, and 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Open Unit 13 to brown bear baiting as follows:

Regulation would read: Brown bear, limit in Unit 13 is one bear per year; brown bears can be taken over bait in registered bait stations.

ISSUE: We would like to see all of Unit 13 opened to brown bear baiting. There are a huge number of bears, particularly in Unit 13B and there are never enough hunters to keep these numbers down enough to help out moose and caribou.

WHAT WILL HAPPEN IF NOTHING IS DONE? Moose and caribou numbers will continue to decline.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? This will improve caribou and moose calf survival, allowing for a more liberal season and more tags, thus increasing the opportunities for more Alaskan families to be able to have food in the winters.

WHO IS LIKELY TO BENEFIT? Alaskans who depend on wild game will have more chances to fill their freezers with moose and caribou.

WHO IS LIKELY TO SUFFER? The brown bear guides may suffer in the area if more bears are taken, unless the guides also set up bait stations, in which case, they may do even better.

OTHER SOLUTIONS CONSIDERED? 1.) ADF&G proposed some aerial predator control for brown bears. This is not a good idea, since sportsman will not get a shot at them and it will be very unpopular with the public. 2.) Considered allowing nonresident hunters to be able to hunt brown bear in Unit 13 without a guide. This would help out immensely, but I don't think the state is ready to allow that.

PROPOSED BY: Claude Bondy EG041812531

PROPOSAL 76 - 5 AAC 85.020, Hunting seasons and bag limits for brown bear, and 92.044. Permit for hunting black bear with the use of bait or scent lures. Open Unit 13D to brown bear baiting as follows:

Establish a Unit 13D brown bear baiting season/permit, for residents and nonresidents, that coincides with the Unit 13 spring black bear baiting season (April 15 - June 30) and that brown bear baiting be administered in the same manner as black bear baiting. Black bear baits that are used year after year continue to draw in many brown bears which have a direct impact on the number of black bears that visit these bait stations when brown bears are present. In turn giving the hunter less opportunity to harvest a black bear.

WHAT WILL HAPPEN IF NOTHING IS DONE? Brown bear hunting opportunity will be unnecessarily restricted and black bear baiters will not be allowed to harvest brown bears that come into their baits. Black bear bait station permittees that spend a lot of time and effort keeping a bait station functional for several weeks trying to harvest a black bear will continue to have several brown bear encounters and less encounters with black bears. Brown bears will continue to dominate black bear baits and the opportunity for young and seasoned hunters to harvest black bears will continue to decrease.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, it will allow black bear baiters to harvest brown bears over their black bear baits. Also, it may result in a few more brown bears killed in Unit 13 D.

WHO IS LIKELY TO BENEFIT? Hunters wanting to bait brown bears and hunters trying to harvest black bears.

WHO IS LIKELY TO SUFFER? People opposed to hunting or brown bear baiting.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Randy Anderson EG043012606

PROPOSAL 77 - 5 AAC 85.020, Hunting seasons and bag limits for brown bear, and 92.044. Permit for hunting black bear with the use of bait or scent lures. Open Unit 13 to brown bear baiting as follows:

Allow brown baiting over black bear bait stations with same restrictions and season date of April 15 to May 31.

ISSUE: Allow brown baiting over black bear bait stations with same restrictions and season date of April 15 to May 31.

Brown bear population is thought to be healthy in Unit 13. A brown bear bait season will not threaten the population of brown bears in Unit 13. Brown bears prey upon calves of caribou and moose. A brown bear baiting season in Unit 13 will alleviate threats from brown bears preying upon calves of caribou and moose in Unit 13. Moose and caribou populations will increase, if this proposal were adopted.

Ending brown bear baiting season on May 31 instead of June 30 will not create a conflict of bear encounters during the fishing season. Regulations state that bait stations may be set up 1/4 mile from trails, and 1 mile from a house or other permanent dwelling. Bait stations will attract bears which will create problems for those who fish for salmon in the Copper River. Setting up a bait station 1 mile from a house will potentially create a confrontation between humans and bears.

WHAT WILL HAPPEN IF NOTHING IS DONE? Brown bears in Unit 13 will continue to prey upon calves of caribou and moose. The calf to cow ratios is below the objective in all

subunits of Unit 13, with the exception of 13E. In Unit 13A, it is 22:100 west, 33: 33:100 east; in Unit 13B it is 25:100; in Unit 13C it is 19:100 in Unit 13D it is 10:100. Calves will not be able to survive and build up moose population in Unit 13.

The survival rate of Nelchina Caribou Herd is considered good; however, a bad winter, predators and hunters could tip the balance and bring about a decline in the population.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Handicrafts could be made from brown bear fur.

WHO IS LIKELY TO BENEFIT? Subsistence hunters will benefit by increased caribou and moose population in Unit 13. More calves will survive in Unit 13. Antler moose restricted hunts may be taken out of hunting regulations if more caribou and moose calves survive.

WHO IS LIKELY TO SUFFER? No one will actually suffer if an experimental brown bear bait season were opened in Unit 13. Some people may not approve of bait stations and will object to the killing of brown bears with a bait station.

OTHER SOLUTIONS CONSIDERED? Allow an experimental brown bear baiting season to be held for two years, with the same restrictions and seasons as black bear bait regulations.

PROPOSED BY: Ahtna Tene Nene' Customary & Traditional Use Committee EG050312631

PROPOSAL 78 - 5 AAC 85.015. Hunting seasons and bag limits for black bear; 5 AAC 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Open Unit 13D to brown and black bear baiting as follows:

I propose having a spring and fall baiting season for both black and brown bear, open to both residents and nonresidents with all the current meat salvage requirements retained for black bear and also applied to brown bear. All guiding requirements would also be applicable for brown bear harvest.

Season dates would be: Spring - April 15 to June 30; Fall - August 20 to October 31. The Department of Fish and Game staff should be given free range to adjust seasons and bag limits if they see signs of over harvesting.

ISSUE: There is a large under harvested population of both black and brown bear in Unit 13D. A significant portion of Unit 13D is very difficult to access. There is no aerial predator control in this area and the moose population has not grown as it has in the rest of unit 13 where aerial wolf control is in effect. Brown and black bear have been proven to be significant predators of moose calves in other areas and I am sure this hold true in this area also.

WHAT WILL HAPPEN IF NOTHING IS DONE? Without baiting for both black and brown bear in this unit there will continue to be an under harvest of an abundant resource and the moose calves will not be given the optimum opportunity for survival and moose calf survival will

continue to be low. Under the current regulations it is cost prohibitive to have fly-in bait stations for just black bear as you have to abandon the bait stations when brown bear start to use them.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Taking bears over bait gives hunters a better opportunity to judge the bears for hair quality and size. By increasing the bear harvest in this sub-unit Fish and Game will be able to see if there is an increase in moose calf survival at the same time.

WHO IS LIKELY TO BENEFIT? All bear hunters who would like to use bait stations will benefit by having an opportunity to harvest either a black or brown bear if it comes to their station, rather than having to abandon the station if a brown bear comes in. By increasing the bear harvest the moose calf survival should increase leading to more harvestable moose to benefit moose hunters.

WHO IS LIKELY TO SUFFER? No one is likely to suffer.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Dan Montgomery

EG043012597

PROPOSAL 79 - 5 AAC 92.015 Brown bear tag fee exemptions. Exclude National Park Service lands from brown bear tag fee exemptions as follows:

92.015 Brown bear tag fee exemptions.

- (a) **Except for lands managed by the National Park Service,** a resident tag is not required for the taking of a brown bear in the following units:

ISSUE: Brown bear resident tag exemptions on lands managed by the National Park Service (NPS) in Alaska. Brown bear tag exemptions are justified by the Board of Game (board) to promote the opportunistic harvest of brown bears, mainly by individuals engaged in other activities such as hunting other species of game (non targeted harvest of bears), or summer recreating activities in general. When tag exemptions are combined with significant liberalizations in bag limits and extended seasons, the result has been a dramatic increase in brown bear harvest rates in much of Alaska.

In a 1998 ADF&G report to the board titled “Resident Brown Bear Bag Limits and Tag Fees,” the department stated: “The Department lacks adequate information on brown/grizzly population numbers in most areas of the state to manage harvest intensively on an annual basis. Because of the difficulty and high costs of estimating bear density, it is unlikely the Department will be able to gather such information on a wide scale in the foreseeable future.”

NPCA considers little has changed since that recommendation was made to the board.

The most aggressive large scale brown bear reduction program strictly relying on liberal general season hunting regulations, including revocation of resident tag requirements since 1995 and no

closed season since 2003 is occurring in Unit 13. Yet, it is noteworthy to point out that the board requires resident tags for brown bear harvest in Denali State Park, also located in Unit 13, while not requiring brown bear tags in Wrangell St. Elias National Park and Preserve, even though the park and preserve has the distinction of being recognized as a World Heritage Site by UNESCO.

Former ADF&G bear researcher, Sterling Miller, noted in “Trends in Intensive management of Alaska’s Grizzly Bears, 1980 – 2010” the dramatic increase in brown bear tag exemptions which included 95% of GMUs 11 – 25 by 2010. (72% of the state). In comparison, in 1980, no resident brown bear tag exemptions existed in these GMUs.

In a letter dated February 16, 2007, the NPS commented to the board on a proposal #72, brown bear tag exemption reauthorization for the historical Region II, by stating: “The intent of this proposal is to continue the brown bear tag fee exemption and thereby increase the harvest of brown bears to decrease predation on moose calves. This proposal is effectively an extension of the state’s intensive management and predator control program and should not be authorized on NPS managed lands. Should the board support this proposal, we request that NPS lands be specifically excluded.”

The board ignored the NPS request and authorized the tag fee exemptions for all NPS lands, while excluding Denali State Park.

Again in a letter dated February 11, 2009, the NPS requested exemption of NPS lands for the reauthorization of brown bear tag fee exemptions in the historic Region II stating: “The intent of this proposal is to continue the brown bear tag fee exemption and thereby increase the harvest of brown bears in order to decrease predation on moose calves. This proposal extends the state’s intensive management control objectives and NPS opposes the extension of such measures on NPS lands.” (emphasis added)

Once again the NPS was ignored.

Then in a letter dated February 18, 2011, the NPS commented in support of Proposal 109, requesting resident brown bear tag fees be reinstated for Denali and Wrangell St. Elias National Park and Preserve by stating: “This proposal would remove the tag fee revocation for all lands in Unit 13 and NPS managed lands in Units 11 and 16B. Consistent with the narrative in the proposal and based on several comments from past years, the NPS supports this proposal as it relates to all NPS lands. The proposed changes potentially affect NPS lands in Denali National Preserve and Wrangell St Elias National Preserve.” (emphasis added).

This time, the board refused to even discuss the proposal or the NPS request that accompanied it, preferring instead to reauthorize brown bear tag exemptions throughout the entire region, and once again, yet requiring brown bear tags in Denali State Park.

As defined in the current Master memorandum of Understanding (MMOU) between the NPS and the State of Alaska, the state agreed to abide by federal law and congressional management mandates for lands managed by the NPS in Alaska.

The state mutually agreed to the following: “To recognize that the taking of fish and wildlife by hunting, trapping, or fishing on certain Service lands in Alaska is authorized in accordance with applicable State and Federal law **unless State regulations are found to be incompatible with documented Park or Preserve goals, objectives or management plans.**” (emphasis added)

WHAT WILL HAPPEN IF NOTHING IS DONE? The board will continue to authorize, and the ADF&G will continue to implement regulations that are inconsistent with documented NPS park purposes and values.

A continued lack of cooperation on the part of the State of Alaska regarding inconsistent state regulations pertaining to documented park or preserve goals, objectives or management plans may result in the promulgation of federal regulations.

Brown bear populations within lands managed by the NPS in Alaska will be vulnerable to unsustainable harvest and/or excessive emigration of brown bears to low density state lands bordering NPS parks, monuments and preserves.

In the 2007 brown bear management report, the ADF&G area biologist stated: “A major problem pertaining to brown bear management is the difficulty in obtaining population data... Because of this; population data are available for only a limited portion of Unit 13. All unit wide bear estimates are based on extrapolations of estimated densities. The problems associated with this are obvious, particularly given the differences in study area and census techniques.” – page 148)

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Brown/grizzly bears have low population density and low recruitment, it is very difficult and expensive to estimate population size and trend, and bears may take many years to recover from population reductions. Requiring brown bear tags promotes, as emphasized by the ADF&G, “an attitude in which most hunters held brown/grizzly bears in high esteem, to be harvested conservatively as part of a carefully planned hunting experience rather than incidental to other activities.” (1998 Report to board)

WHO IS LIKELY TO BENEFIT? The proposed amendment protects NPS park purposes and values, including the highest management value for the nonconsumptive wildlife viewing public where naturally regulated populations of bears and intact ecosystems are promoted to the maximum extent possible.

WHO IS LIKELY TO SUFFER? Special interest groups who prefer artificial management of ecosystems within Alaska’s national preserves.

OTHER SOLUTIONS CONSIDERED? The NPS and NPCA have consistently requested that the board exempt NPS managed lands when state and federal management objectives differ. The fundamental intention of the MMOU between the NPS and State of Alaska is to define guidelines for cooperative management between the state and federal government. Unfortunately, the board has consistently refused to address NPS concerns, comments, and proposals.

PROPOSAL 80 - 5 AAC 92.108. Identified big game prey populations and objectives.

Modify the moose population and harvest objectives for Unit 13B as follows:

Our Advisory Committee, based on over 150 years combined residency in Unit 13B, recommends a population objective of 4,000-5,000 moose, with a harvest objective of 240-280.

ISSUE: The population and harvest objective numbers are too high to support. Unit 13B has a estimated moose population of 1.7 moose per square mile. The majority of Unit 13B is high country, above timberline. The moose leave the high elevations in early November for river valleys where there is available feed. Very, very few moose stay in the country above timber, other than several dozen along the upper Tangle Lakes system. The present population abjective of 5,000-6,300 moose is not supported, nor is it supportable by scientific data.

The current harvest of 263 (2011) is lower than the current harvest objective of 310-620. Under the current regulations that harvest would be bulls only. The bull/cow ration in Unit 13B is 25 per 100---the current population estimate is 5,340 moose which computes to about 1,100 bull moose. Take 500 bulls from that population and the bull/cow ratio is reduced to an unacceptable range; approximately 13/100.

The condition of browse that Unit 13B moose utilize is currently unknown. Browse studies have just begun. Deep snow in 2012 forced concentrations in wintering areas that may not be sustainable. Calf production seems on the low end of the range in the low 20's per hundred cows.

WHAT WILL HAPPEN IF NOTHING IS DONE? The potential for a population crash such as occurred during the winters of 1970-71 and 71-72 may very well occur.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes; as it addresses winter survival and productivity.

WHO IS LIKELY TO BENEFIT?

WHO IS LIKELY TO SUFFER?

OTHER SOLUTIONS CONSIDERED? This was a long discussion by our advisory group. Our solutions were mostly based around numbers. We discussed the need to manage bull/cow rations within the breeding areas rather that just unit wide. Harvest in Unit 13 is concentrated along the highway systems. Counting moose and figuring bull/cow ratios unit wide can lead to skewed data.

PROPOSAL 81 - 5 AAC 92.108. Identified big game prey populations and objectives.

Modify the moose population and harvest objectives for Unit 13 as follows:

Unit 13 Moose Population and Harvest Objectives

Subunit	Moose Population Objective Range	Harvest Objective	Harvest Objective Range:
13A	3,500-4,200	<u>7%</u>	<u>245-294</u> [210-420]
13B	5,300-6,300	<u>5%</u>	<u>265-315</u> [310-620]
13C	<u>2,000-3,000</u> [2,600-3,500]	<u>5%</u>	<u>100-150</u> [155-350]
13D	<u>1,500-2,200</u> [1,200-1,900]	<u>5%</u>	<u>75-110</u> [75-190]
13 E	<u>5,500-6,500</u> [5,000-6,000]	<u>5%</u>	<u>275-325</u> [300-600]

ISSUE: Moose population and harvest objectives in Unit 13 that may not be realistic, or good for the long term health of the Unit 13 animal populations.

WHAT WILL HAPPEN IF NOTHING IS DONE? Maybe nothing, or maybe unforeseen problems may develop from keeping the predator (wolf) population at unnaturally low levels for long periods of time in order to keep increasing moose numbers to abnormally high numbers. We feel current (2011) moose population and harvest levels are healthy and sustainable, and so adjusted the population and harvest objectives to match current levels with a range to allow some growth. This healthy population of moose was brought back from record declines and low numbers of 10 years ago mainly due to the successful wolf control program. It is time to take into consideration that we may have nearly enough moose for this area, as far as carrying capacity, and we feel it's time to start slowing up the growth of the moose herd by closing the same day airborne (SDA) on wolves for a period of time, to let the wolves build up to more natural numbers. We are really not sure how many moose the area can handle, and we don't want to find out the hard way.

This proposal, in conjunction with another proposal in this booklet written by the Copper Basin Fish and Game Advisory Committee rewording some of the Unit 13 Intensive Management Plan, will allow wolf control to slow down or stop for a period of time in most of the unit. The moose herd should continue to grow slightly for a couple more years until the wolf population jumps back up. Then hopefully a combination of increased harvest opportunity (cow hunt proposal) and higher wolf numbers will level out the growth of the moose herd.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The successful wolf control program in Unit 13 should shift gears and scale back for a period of time to allow the wolf population to return to more natural numbers, and this proposal will help to allow that to happen. Close monitoring of moose and wolf numbers will be essential. It is also essential that the wolf control tool be available to the

manager if needed. There will be increased moose hunting opportunity with the increased moose numbers. There will also be increased wolf trapping opportunity for the wolf trappers.

WHO IS LIKELY TO BENEFIT? Moose hunters will benefit. Wolf trappers will benefit.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Leaving the numbers as they were would be status quo. Some of the harvest numbers seemed unrealistic, and also some population goals. Until the goals set are reached, the wolf control doesn't stop. We feel we have enough moose, so we changed the goals.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee EG050112609

PROPOSAL 82 - 5 AAC 92.125. Intensive management plans. Modify the wolf population objective under intensive management for Unit 13 as follows:

We feel that the present wolf population trigger needs to be much closer to the mid-point of the population range. Also that the wolf population count that triggers the shut-off of intensive management (IM). should be confined to the IM area, not unit wide. Wolves counted in Unit 13D rarely migrate into the IM area.

We favor a protocol that would control the population closer to both the mid-point of the population range. The number of 135 was acceptable to us as long as the count was contained within the IM area. Wolf population is not a stand-alone item. The population could also be tied as a ratio of wolves/moose within the IM.

ISSUE: Low wolf numbers in Unit 13. We feel that a certain number of wolves are necessary in the Unit. The wolf population is artificially low which is leading to a number of issues that have unknown consequences. Some indicators are an excessive number of coyotes in the upper portions of the Unit. Ravens moving from traditional habitats. While neither of these things may become an issue, they certainly should give us a sign that something is changing. The current IM program only triggers at the extremes of the moose population or at the low end of the wolf population. The present wolf population in the central portion of Unit 13 is basically non-existent.

WHAT WILL HAPPEN IF NOTHING IS DONE? That is the point; we don't know. Wolves provide a necessary balance to the eco-system.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. A few more wolves available for area trappers. Wolf tracks for non-consumptive users. Health of the ecosystem.

WHO IS LIKELY TO BENEFIT? Those who utilize wolves for sport or pleasure. Aerial hunters who participate in the IM program, by providing enough wolves to make it feasible. Moose hunters who value a healthy moose population.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Sub-unit wolf population control. Rejected as difficult to manage because of wolf pack range and poor history of sub-unit population estimates.

PROPOSED BY: Paxson Fish and Game Advisory Committee. EG043012585

PROPOSAL 83 - 5 AAC 92.125. Intensive management plans. Modify the intensive management plan for Unit 13 as follows:

Reword the Unit 13 Intensive Management Plan under 5 AAC 92.125 (as of 2012) as follows:

- ...
6. other specifications the board considers necessary are as follows:
 - (A) the commissioner will suspend wolf control activities
 - (i) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers **in the IM** area below the management objective of **100** [135] wolves specified in this subsection;
 - (ii) when spring conditions deteriorate to make wolf control operations infeasible;
 - (iii) no later than April 30 in any regulatory year; or
 - (iv) when prey population **meets or exceeds the midpoint of population objectives by subunit**; [AND HARVEST OBJECTIVES ARE RELIABLY ATTAINED;]
 - (B) wolf control activities will be terminated upon expiration of the period which the commissioner is authorized to reduce predator numbers in the predator control plan area;
 - (C) **wolf control activities will commence by subunit when prey population falls below the minimum objective.** [THE COMMISSIONER WILL ANNUALLY CLOSE WOLF HUNTING AND TRAPPING SEASONS AS APPROPRIATE TO ENSURE THAT THE MINIMUM WOLF POPULATION OBJECTIVE IS MET.]

ISSUE: Reword some of the Unit 13 Intensive Management Plan as a way to give the manager more direction and flexibility to scale back in a successful wolf control plan. We need recognizable triggers to start and stop wolf control activities in intensive management areas. Another problem with the wording as it is: Wolf trapping and hunting has to stop when wolf control activities stop. We feel that the regular wolf trapping and hunting seasons should not be affected in any way by the wolf control seasons. It should be mentioned that this proposal was submitted along with another proposal by the Copper Basin Fish and Game Advisory Committee in this same booklet setting new moose population and harvest objectives for Unit 13, that would trigger action or inaction of wolf control that is different than what would be the triggers if the objectives are left as is.

WHAT WILL HAPPEN IF NOTHING IS DONE? Managers will not have a definite trigger point as to when to start or stop wolf control activities.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Better triggers for wolf control activities.

WHO IS LIKELY TO BENEFIT? Wolf trappers will benefit.

WHO IS LIKELY TO SUFFER? No one should suffer because of this proposal.

OTHER SOLUTIONS CONSIDERED? It was suggested to regulate the wolf take by subunit instead of unit wide, as some areas of the unit are more open and easier to take wolves. As a result, the more open subunits may end up early in the winter with less than the desirable density of wolves (spring management objective), and should probably be closed to taking wolves earlier in the winter. However, the total unit wide numbers when balanced with the areas more timbered and thus more difficult to take wolves, are averaged together and then more in line with the unit wide goal. It was explained that there is almost no budget for counting wolves as it is, and the additional cost to do it by subunit would not be possible with the current monies available.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee EG050112610

PROPOSAL 84 - 5 AAC 92.108. Identified big game prey populations and objectives; 5 AAC 92.110. Control of predation by wolves; 5 AAC 92.115. Control of predation by bears; and 92.125 Intensive management plans. Establish a predator control program in Units 11 and 12 as follows:

Establish a positive finding, determine population objective and harvest objective under 5AAC 92.108 for Mentasta Caribou Herd and establish a new wolf and bear control program in Unit 11 and Unit 12 on Ahtna's inholdings. Predator control program would be in Unit 11 on Ahtna's checkerboard in holdings south of Suslositna Creek to Sanford River.

ISSUE: Establish a positive finding, determine population objective and harvest objective under 5 AAC92.108 for Mentasta Caribou Herd and establish a new wolf and bear control program on Ahtna's in holdings. Predator Control Program would be on Ahtna's checkerboard in holdings south of Suslositna Creek to Sanford River.

Ahtna's checker board land status shouldn't be a deterrent to establishing a newly created predator control program. Ahtna's in holdings within these proposed boundaries will allow airplanes to land on nearby rivers, lakes and ponds to take wolves and bears. This program will be a success, and the Mentasta Caribou Herd population will increase and subsistence needs will be met.

Predation of wolves and bears are known to be the problem of poor Mentasta Caribou Herd population. Mentasta Caribou Herd has been on a severe decline since the 90s, and is continuing

to decline. A newly created predator control program and a positive finding for the Mentasta Caribou Herd in the two units will increase opportunities to harvest a caribou. When the herd increases so that a hunt can occur, hunters will have another caribou herd to hunt for and harvest in Unit 11 and Unit 12.

WHAT WILL HAPPEN IF NOTHING IS DONE? The last population Mentasta Caribou Herd count in 2010 was at 326. The low population is due to wolves and bears preying upon calves of this caribou herd. The Mentasta Caribou Herd is in jeopardy. A predator control program is imperative to build up this herd, before it continues to be severely impacted by predators.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Everyone will benefit, if a new predator control program is established in Unit 11 and Unit 12 findings for Mentasta Caribou Herd, harvest objectives and population objectives were established. Mentasta Caribou Herd will only increase and more hunters will have more opportunities of harvest a caribou.

WHO IS LIKELY TO SUFFER? No one will actually suffer. Some people may dislike predator control programs because they think it is inhumane.

OTHER SOLUTIONS CONSIDERED? There is no other solution to this problem. Mentasta Caribou hunting season has been closed since mid-nineties due to predation by wolves and bears.

PROPOSED BY: Ahtna Tene Nene' Customary & Traditional Use Committee EG050312632

PROPOSAL 85 - 5 AAC 92.108. Identified big game prey populations and objectives, 5 AAC 92.110. Control of predation by wolves, 5 AAC 92.115. Control of predation by bears; and 5 AAC 92.125. Intensive management plans. Establish a predator control plan in Unit 11 as follows:

Establish a positive finding, determine population objective and harvest objective under 5 AAC 92.108 for Unit 11 moose and establish a new wolf and bear control program in Unit 11 on Ahtna's in holdings. Predator control program would be in Unit 11 on Ahtna's checkerboard in holdings between Boulder Creek and Sanford River, and south of Mineral Springs to Kuskulana River.

ISSUE: Establish a positive finding, determine population objective and harvest objective under 5 AAC 92.108 for Unit 11 moose and establish a new wolf and bear control program in Unit 11 on Ahtna's in holdings. Predator Control Program would be in Unit 11 on Ahtna's checkerboard in holdings between Boulder Creek and Sanford River, and south of Mineral Springs to Kuskulana River.

Ahtna's checker board land status in Unit 11 shouldn't be a deterrent to establishing a newly created predator control program. Ahtna's in holdings within these proposed boundaries will allow air planes to land on nearby rivers, lakes and ponds to take wolves and bears. This program will be a success, and the moose population will increase and subsistence needs will be met.

Predation of wolves and bears are known to be the problem of poor moose and Mentasta Caribou Herd population in Unit 11. A newly predator control program and a positive finding for moose in Unit 11 will increase opportunities to harvest a moose in Unit 11. Impact in Unit 13 from hunters is increasing each year and many local people will have to hunt in Unit 11 to meet subsistence needs.

WHAT WILL HAPPEN IF NOTHING IS DONE? Moose in Unit 11 is at a low density mainly due to wolves and bears preying upon calves of moose. Moose population range is .5 to .9 per square mile. If a predator control program is not established in Unit 11 for moose, the population of moose will continue its downward spiral.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Everyone will benefit, if a new predator control program is established in Unit 11 and findings for moose, harvest objectives and population objectives were established. Moose population will increase.

WHO IS LIKELY TO SUFFER? No one will actually suffer. Some people may dislike predator control programs because they think it is inhumane.

OTHER SOLUTIONS CONSIDERED? There is no other solution to this problem. Lengthy seasons for hunting wolves and bears are already in place to attempt to increase moose population.

PROPOSED BY: Ahtna Tene Nene' Customary & Traditional Use Committee EG050312633

PROPOSAL 86 - 5 AAC 85.056. Hunting seasons and bag limits for wolf, 5 AAC 84.270. Trapping seasons and bag limits; and 92.125 Intensive management plans. Close an area near Denali National Park in Unit 13 to taking wolves as follows;

The area of Unit 13 west (and north) of the Parks Highway to the boundary of Denali National Park, and the area of Unit 13 within 5 miles east (and south) of the highway, is closed to any taking of wolves.

ISSUE: The unacceptable level of take on state lands of wolves that use Denali National Park. The Park's wolf populations are significantly reduced, to an extent due to take on state lands adjoining and just east and south of the Park boundary. These wolves provide enormous viewing opportunities for several hundred thousand visitors each year, and the continued take of even a few prominent individual wolves, such as the Alpha female from the Grant Creek pack in April

2012, represents a significant loss of viewing opportunities. The Grant Creek female loss represents the loss of breeding potential to that pack, and to the eastern Park area. As well, wolves on state lands adjacent to the Park are a source for repopulation of the Park's depleted wolf populations. Thus, the Board of Game should establish a no-take wolf buffer along the eastern edge of Denali National Park.

WHAT WILL HAPPEN IF NOTHING IS DONE? There would be continued loss of wolf populations in Denali National Park, and a resulting loss of their ecological value, intrinsic value, and significant tourism value. As was seen with the loss of the Alpha female from Gant Creek pack in April 2012, even the loss of one important reproductive female can cause the reproductive capacity of the eastern Park wolf populations to be reduced, thus compromising viewing opportunities by visitors.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The proposal will provide additional protection for Denali National Park wolf populations, and thereby provide the highest and best use of this resource.

WHO IS LIKELY TO BENEFIT? All visitors to Denali National Park, science, and the wolf populations of the park.

WHO IS LIKELY TO SUFFER? Two or three recreational trappers/hunters who are active along the eastern boundary of the National Park.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Rick Steiner

EG043012592

PROPOSAL 87 - 5 AAC 85.025. Hunting seasons and bag limits for caribou, and 5 AAC 92.540. Controlled use areas. Allow use of off-road vehicles for elderly and disabled to hunt caribou in Unit 13 as follows:

To allow the use of 4-wheelers in state parks to access hunting for elderly and/or disabled people.

ISSUE: Access for elderly and/or disabled people to hunt.

WHAT WILL HAPPEN IF NOTHING IS DONE? Many of Alaskan longtime residents will lose their ability to participate in hunting caribou.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?

WHO IS LIKELY TO BENEFIT? Elderly and/or disabled.

WHO IS LIKELY TO SUFFER? No one – others have the ability to access the resource.

OTHER SOLUTIONS CONSIDERED? Was told that no permit was available.

PROPOSED BY: Betty Oliver

EG050712692

PROPOSAL 88 - 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the hunting season open date and bag limit for Ptarmigan in Unit 13 as follows:

Unit 13B, ptarmigan season: August 20 to March 31; 5 per day, 10 in possession.

ISSUE: Ptarmigan season and bag limit for Unit 13B

WHAT WILL HAPPEN IF NOTHING IS DONE? Hunters will be missing an opportunity to hunt a healthy bird population.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The ten day later opening allows for young birds to grow to near adult size. Much of the Unit 13B bird hunting takes place along the Denali Highway where nesting times are significantly later than in many other areas near the road system. Many times the some broods are not fully-featured by the current August 10 opener.

WHO IS LIKELY TO BENEFIT? It would benefit hunters who utilize ptarmigan as a food source, rather than solely for sport.

WHO IS LIKELY TO SUFFER? Early season sport hunters.

OTHER SOLUTIONS CONSIDERED? February closure date. Rejected to allow hunters a bit more access in better weather conditions. Same August 10 start date as now. Rejected as we have never felt this season date made any since for ptarmigan. It was originally implemented for grouse.

PROPOSED BY: Paxson Fish & Game Advisory Committee

EG043012588

PROPOSAL 89 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Establish and muzzleloader and archery hunt for Dall sheep in Unit 13A as follows:

The preferred solution would to create a primitive weapons hunt for Unit 13A allowing muzzleloader and archery equipment only for harvesting full curl Dall rams. This would reduce pressure on the herd. A less preferred solution would be to create a drawing permit hunt. The boundaries could be from the Glenn Highway down Caribou Creek then up Flume creek and over the pass to McDougal Creek to Flat Creek to Little Nelchina River and back to the Glenn Highway.

ISSUE: The Horn Mountains in Unit 13A receive a tremendous amount of Dall sheep hunting pressure because of easy off-road vehicle access resulting in substantial pressure on the resource, both from sheep hunters and from incidental harvest from caribou and moose hunters. This results in a poor quality hunting experience, tremendous pressure on the sheep herd, and user conflicts.

WHAT WILL HAPPEN IF NOTHING IS DONE? Continued heavy hunting pressure is detrimental to the Dall sheep population and creates a poor hunting experience. This area is used by considerable numbers of hunters during the Nelchina caribou hunt.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Allowing muzzleloaders and archery equipment only would reduce the take of marginally legal rams and improve the quality of the herd and improve the quality of the hunting experience.

WHO IS LIKELY TO BENEFIT? Archery and muzzleloader hunters will benefit from an improved hunting experience. The Dall sheep population would benefit from decreased hunting pressure.

WHO IS LIKELY TO SUFFER? Moose and caribou hunters who hunt sheep incidental to their moose or caribou hunt.

OTHER SOLUTIONS CONSIDERED? A drawing permit hunt could be considered but hunting opportunities for muzzleloader hunters are severely limited in Alaska and should be expanded.

PROPOSED BY: Scott Peterson EG042212540

PROPOSAL 90 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the resident sheep hunt and bag limit for Unit 13 as follows:

Increase hunter opportunity by eliminating draw requirement (DS160 and DS165) for resident sheep hunters in Unit 13D beginning in 2014. Nonresident draw tags (DS260 and DS265) to be fixed to approximately the current quota of 10 to 12 tags. Return entire area to full curl requirement.

Although sheep numbers in Unit 13D are still well below historic highs, the area is known for its trophy potential and is likely to attract a percentage of resident hunters away from areas of high pressure. The proposal also allows nonresident tags to be maintained at current levels for no net loss of opportunity to that user group.

ISSUE: Several major sheep hunting areas in the state are seeing increased pressure from both resident and nonresident hunters. This is most notable in the Central Alaska Range and Brooks Range, both areas which are well known and are served by a number of transporters. For

example, during the 2005-2010 time frame, large increases in the number of resident hunters were seen in Units 20A (+28%), 26C (+93%), and 25A (+87%).

The increase in sheep hunter numbers in these popular areas has resulted in reduced hunt quality and localized overcrowding for many users, as well as both real and perceived conflicts between resident and nonresident guided hunters. It is also likely that a high percentage of the mature rams are being harvested in these areas on an annual basis. These issues are evidenced by the numerous proposals in recent years to restrict certain user groups or convert sheep areas to draw.

At least some of the increase in hunting pressure in these Units can be attributed to the displacement of resident sheep hunters from Units 13D and 14A by low levels of mature rams in 2005-2007 and the subsequent implementation of the new draw areas in 2008. This reduction in hunter opportunity has caused significant hunter dissatisfaction both directly through loss of hunting area, and indirectly by increasing hunter numbers in popular units.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED? Unless hunter opportunity is increased in other areas of the state, there will continue to be high levels of hunting pressure in the certain open areas. This will result in further hunter dissatisfaction and additional proposals to the Board of Game to restrict certain user groups, allow some type of resident advantage, or convert additional areas to draw.

DOES YOUR PROPOSAL ADDRESS IMPROVING THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED? IF SO, HOW? I believe the elimination of the resident draw requirement for Unit 13D will help reduce the rise in hunting pressure and the various user conflicts and hunter dissatisfaction currently at issue in the Brooks Range and Central Alaska Range. In addition, I believe that it will have no significant biological impact on the sheep populations of the Chugach Range.

The creation of the Unit 13D draw areas were in response to a combination of heavy hunting pressure and a reduced sheep population. This had resulted in poor hunt quality and the annual harvest of a high percentage of the mature rams and was a justifiable decision at that time. However, since the elimination of over-the-counter tags in Unit 13D the number of mature rams in the Unit 13D appears to have since stabilized and success rates for hunters in these areas have increased to a notable degree. As examples, between 2008 and 2010 the success rate for DS165 increased from 5% to 35%, and DS265 (nonresident) increased from 40% to 100%. That the success rate for all Unit 13D tags are currently well above statewide averages indicates that some additional harvest is possible.

Based on typical pre-2006 harvest rates for resident hunters and the current harvest rate for nonresident hunters, I estimate that harvest levels for Unit 13D West (DS160/260) and Unit 13D East (DS165/265) combined would be approximately 20 to 30 rams under this proposal. Although slightly higher than the current harvest under the draw program, it would still be significantly lower than the combined resident/non-resident harvest of approximately 45 to 70 rams from these areas between 2000 and 2005. It should be noted that Unit 13D has traditionally been popular with guides, and subsequently non-resident hunters have historically taken the larger percentage of the sheep from Unit 13D. By keeping non-resident hunters on a limited

draw, the total harvest will remain well under pre-2005 levels while still having an impact on overall hunter distribution in the state.

During discussion and comment on numerous sheep proposals in the last Board of Game cycle, the Alaska Department of Fish and Game (ADF&G) stated a number of times that full curl regulations are an adequate guard against biological damage to the resource. If this is the case, then there should be no major biological concerns with allowing a measured amount of additional harvest in 13D. In exchange for this additional harvest in Unit 13D, hunt quality and available rams will be increased for hunters in other areas of the state.

WHO WILL BENEFIT IF YOUR PROPOSAL IS ADOPTED? Resident hunters will benefit by having increased hunting opportunity in a high quality trophy area and decreased competition in other areas. Nonresident guided hunters in other areas of the state will benefit from a decrease in competition from residents.

WHO IS LIKELY TO SUFFER IF YOUR PROPOSAL IS ADOPTED? Nonresident guided hunters in Unit 13D will see increased competition for available rams from resident hunters. ADF&G will no longer be able to tightly control harvest in these areas. Given the typical low success rate (~20%) for resident hunters in open areas, this is unlikely to be a significantly issue.

LIST ANY OTHER SOLUTIONS YOU CONSIDERED AND WHY YOU REJECTED THEM. 1.) I considered the inclusion of portions of Unit 14A in this proposal, which would create additional high quality opportunity for hunters. However Unit 14A is more easily accessible and may not be able to sustain the amount of pressure at this time. If the ADF&G believes that portions of Unit 14A could again handle harvest ticket/full curl regulations, this would be a preferred option.

2.) I considered the effect of also eliminating the draw requirement for non-resident hunters. However with the significantly higher success rates of non-resident guided hunters and the currently low sheep populations, I believe that this would again result in unsustainable harvest levels. If the guide concession program currently under consideration goes in to effect, this may be an acceptable option.

PROPOSED BY: Isaac Rowland EG050112619

PROPOSAL 91 - 5 AAC 85.055 Hunting season and bag limit for Dall sheep. Change the Dall sheep bag limit to full curl, convert the draw hunts to general hunts for Units 13 and 14A, and limit nonresident allocation as follows:

All Dall sheep hunts in all of Unit 13 and Unit 14A would become full curl only with general hunts. No drawing in these areas, with nonresidents limited entry (less than 5 tags to nonresidents).

ISSUE: Resident sheep hunters have too little roadside access to sheep.

WHAT WILL HAPPEN IF NOTHING IS DONE? Continued discontent between residents, nonresidents and guides.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? It allows Alaska residents areas with ease of access.

WHO IS LIKELY TO BENEFIT? The Anchorage resident who has a short window of opportunity.

WHO IS LIKELY TO SUFFER? Nonresidents and a few guides.

OTHER SOLUTIONS CONSIDERED? Nonresidents allowed to hunt sheep, reducing the number of statewide.

PROPOSED BY: Steve Flory Sr. EG050912706

PROPOSAL 92 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify bag limit to full curl in Units 14A and 13D as follows:

I would like to see a return to the full curl, eight years old or broomed on both sides harvest limitation.

ISSUE: Current regulations allow for hunters who have drawn a sheep tag in Units 14A and 13D West to harvest any ram without size limitations. This leads to the harvest of rams who have not yet had a chance to breed. The sheep population in all of the Chugach is depressed, which has necessarily led to the greatly decreased hunt opportunity under the drawing permit system. Killing immature rams before they have a chance to breed and an under harvest of mature, old rams is occurring under these regulations. Too many hunters with these permits kill the first ram they come to. There are more large old rams than there are permits and the rams are dying of old age without being harvested. If we only harvested mature, full curl rams from this unit we could double the number of permits issued.

WHAT WILL HAPPEN IF NOTHING IS DONE? The population will not rebound as quickly, and less rams will reach breeding age and trophy status. There will continue to be decreased hunter opportunity and rams will continue to die of old age before hunters have an opportunity to harvest them. Under current any ram regulation, less permits are issued because it is easier to be 'successful' because of the harvest of immature rams.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? More rams will live to be full curl trophies and breed-able age.

WHO IS LIKELY TO BENEFIT? All trophy sheep hunters, who will see more sheep live to trophy age. All sheep hunters as more permits could be offered under more selective full curl regulation.

WHO IS LIKELY TO SUFFER? Those who are willing to kill a sub-mature ram and get drawn for the permit.

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Daniel Montgomery

EG043012598

Palmer Area - Units 14A, 14B, and 16

PROPOSAL 93 - 5 AAC 85.045(12). Hunting seasons and bag limits for moose. Reauthorize the drawing permit hunts for antlerless moose in Unit 14A as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
Unit 14(A) 1 moose per regulatory year, only as follows: ...		
1 antlerless moose by drawing permit only; up to 1000 antlerless moose permits may be issued ...	Aug. 20-Sept. 25 (General hunt only) Nov. 1-Dec. 25 (General hunt only)	No open season

ISSUE: Antlerless moose hunts must be re-authorized annually by the Board of Game. Moose surveys conducted in November 2011 resulted in an estimate of 7,467 moose in subunit 14(A). This estimate was slightly greater than the post-hunt objective of 6,000 – 6,500 moose and is an increase from the results of the 2008 survey that produced an estimate of 6,613 moose. The observed bull cow ratio (19 bulls:100 cows) and calf ratio (40 calves:100 cows) were lower than the ratios observed during the composition survey in 2009 (25 bulls:100 cows and 49 calves:100 cows). Snow depth accumulations in the subunit during the 2006-2010 winters were considered average and survival of calves and adults were likely good; however the effect of the deep snow winter in 2011 are unknown.

Based on current projections, the subunit 14A moose population is expected to grow and continue to exceed population objectives. If the density of moose is allowed to increase, we anticipate an increase the number of moose-human conflicts, and moose may experience nutritional stress as the population nears carrying capacity. Cow harvests are warranted to prevent control the moose population’s growth and recommended as a way to provide additional moose hunting opportunity in the Mat-Su Valley.

WHAT WILL HAPPEN IF NOTHING IS DONE? Portions of the Unit 14A moose population could grow beyond the ability of the habitat to sustain the population. Increased cases of starvation, conflicts with humans, and vehicle collisions will occur.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes; excessively high moose density can lead to nutritionally stressed animals in the harvest.

WHO IS LIKELY TO BENEFIT? All who wish a healthy, productive moose population in the Mat-Su Valley, and those who wish to use antlerless moose for human consumption.

WHO IS LIKELY TO SUFFER? Those who disagree with the harvest of antlerless moose.

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050712667

PROPOSAL 94 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose. Modify the season and/or bag limit for moose hunting in subunit 14A as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
Unit 14(A)		
1 moose per regulatory year, only as follows:		
...		
1 bull with [SPIKE-FORK ANTLERS OR] 50-inch antlers or antlers with 3 or more brow tines on one side, by bow and arrow only: or	Aug. 10 – Aug. 17 (General hunt only)	Aug. 10 – Aug. 17
1 bull [WITH SPIKE-FORK ANTLERS OR] 50-inch antlers or antlers with 3 or more brow tines on one side:	<u>Aug. 25 - Sept. 20</u> [Aug. 25 - Sept. 25] (General hunt only)	<u>Aug. 25 - Sept. 20</u> [Aug. 25 - Sept. 25]

ISSUE: This is a placeholder proposal that will allow the Board of Game to modify hunting regulations in subunit 14A if warranted. The department will collect additional information about the subunit 14A moose population to determine if either the season or bag limit should be

altered to keep the bull ratio within management objectives. The proposal may also be withdrawn if surveys indicate that objectives are being met and no changes are needed.

During November 2011, the moose population in subunit 14A was surveyed and estimated to include 7,467 moose. The bull ratio was 19 bulls:100 cows, which is below the objective of 20-25 bulls:100 cows and lower than the bull ratio observed in 2008 (23 bulls:100 cows). The 2011 survey was followed by an above average snow fall winter that may have reduced the survival of calves and bulls, which are more susceptible to nutritional stress. Although it is uncertain how the deep-snow winter affected the population or the bull ratio at this point, it may be necessary to take corrective action to reduce bull harvest if the bull ratio has fallen below the management objective. The department will survey the 14A moose population during the fall of 2012 to evaluate the effects of the deep snow and make further recommendations pending the outcome of the surveys.

WHAT WILL HAPPEN IF NOTHING IS DONE? The bull ratio in the subunit 14A moose population may be below objective and could remain below objectives for some time.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes; low bull ratio may reduce hunter success rates from the bull component of the harvest over time and if the bull ratio trends downward it may eventually affect the productivity of this population.

WHO IS LIKELY TO BENEFIT? Those who want to see bull to cow ratios in this population within objective, want a healthy, productive moose population in 14A, and want to see a potential increased bull harvest in the long term.

WHO IS LIKELY TO SUFFER? These proposals will likely reduce the bull harvest in the short term.

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050412657

PROPOSAL 95 - 5 AAC 92.220. Salvage of game meat, furs, and hides. Require moose hunters in Unit 14A to submit jaw bone and antlers to ADF&G as follows:

Require that all moose hunters who harvest a bull moose in Unit 14A bring the lower jaw and antlers to an ADF&G office for aging and measuring within 10 days of killing the animal. This regulation could sunset after 2 years -- unless ADF&G was interested if further data collection. Data collection will also provide additional information concerning the number of illegal antlered moose which may be harvested in this area.

ISSUE: Moose aging and antler measuring. Many Unit 14A hunters believe that a significant number of the annual reported bull moose harvested in this area may have illegal antler configuration or widths. Some also feel that a significant portion of bull moose from this area may never grow legal antlers under the current spike/fork/50 inch/ 3 brow tine antler restricted

harvest in this area. Without verified data these concerns cannot be adequately addressed. The Matanuska - Susitna Borough Fish and Wildlife Commission requests collection of accurate data concerning bull moose age, antler width, and antler configurations in Unit 14A.

WHAT WILL HAPPEN IF NOTHING IS DONE? High numbers of illegal harvested bull moose may occur and continue to occur if sufficient data is not available for this game unit.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? It would help the ADF&G manager to more accurately determine how well the current antler configuration regulations match the bull moose being harvested from the Unit 14A moose population and at what ages moose in the population become antler legal. Results of this data collection may justify the current selective harvest regulations or suggest a better alternative that more closely matches the antler configurations present in the Unit 14A moose population

WHO IS LIKELY TO BENEFIT? All Unit 14A moose hunters could benefit from better knowledge of moose antler configuration present in the population.

WHO IS LIKELY TO SUFFER? All successful Unit 14A hunters who harvested a bull moose would be required to submit their specimens for aging and measurement for at least a couple years.

OTHER SOLUTIONS CONSIDERED? A.) A requirement aimed at aging and measuring just moose larger than spike/fork was considered, but a discussion with an ADF&G wildlife biologist indicated that information about the smaller bulls harvested within the Unit 14A population would be valuable as well. B.) In discussion with the previous area wildlife manager, we considered other time requirements, and another time requirement would be acceptable. However, we found 10 days to be more consistent with other moose specimen reporting requirements already in place throughout Alaska.

PROPOSED BY: Mat-Su Borough Fish and Wildlife Commission EG042612555

PROPOSAL 96 - 5 AAC 85.045(12). Hunting seasons and bag limits for moose. Establish a winter antlerless moose hot-spot hunt in 14B to address vehicle collisions and nuisance moose issues in the Matanuska / Susitna Valley areas and reauthorize the existing winter antlerless moose hot-spot hunt in Unit 14A as follows:

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits (12)		

Unit 14A
1 moose per regulatory year,

only as follows:

...

1 moose by
hot-spot permit only; by

shotgun **or archery** only; up to 200
permits may be issued

Winter season to
be announced by
emergency order
(General hunt only)

No open season

Unit 14B

1 **moose** [BULL] per regulatory year,
only as follows:

...

**1 moose by
hot-spot permit only; by
shotgun or archery only; up to 100
permits may be issued**

**Winter season to
be announced** by
emergency order
(General hunt only)

No open season

ISSUE: The hot-spot registration hunt in subunit 14A is an effective tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. This proposal would expand the hunt into subunit 14B to address similar concerns. It also would allow the use of bow and arrow to harvest moose in areas where local ordinances prohibit the use of firearms.

Moose-vehicle collisions result in property damage and may result in human injury or death. . . An average of 266 moose per year were killed in the Mat-Su Valley area during the last few years of average snowfall and substantially more were killed during higher snowfall years.

The department's intent is to use this registration hunt target moose in areas with high rates of moose-vehicle collisions to reduce vehicle accidents and provide additional harvest opportunity. Hunters would be selected from a list of pre-registered hunters that are prioritized by random selection. Hunters will need to respond quickly (i.e. within 24 hours) to harvest a moose from specifically defined "hot-spot" moose-vehicle collision area.

WHAT WILL HAPPEN IF NOTHING IS DONE? Portions of the subunit 14S and 14B moose populations will continue to be killed on the roads and highways of the Matanuska – Susitna Valley area. Increasing conflicts with humans and vehicle collisions will occur as the human population of the Mat-Su Borough continues to grow.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes; moose harvested under this regulation will generally have better quality meat than that provided through the state's road kill program.

WHO IS LIKELY TO BENEFIT? All who wish to have a healthy, productive moose population in the Matanuska-Susitna valleys, reduced motor-vehicle/moose collisions, conflicts and provide antlerless moose for human consumption.

WHO IS LIKELY TO SUFFER? Those who disagree with the harvest of antlerless moose and/or winter moose hunts.

OTHER SOLUTIONS CONSIDERED? Winter drawing antlerless moose hunts

PROPOSED BY: Alaska Department of Fish and Game EG050412655

PROPOSAL 97 - 5 AAC 085.045(14). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunt on Kalgin Island in Unit 16B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(14)		
...		
Unit 16(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20 - Sept. 20	Aug. 20 - Sept. 20

...

ISSUE: Antlerless moose hunts must be re-authorized annually. The population objective for this predator-free, 23-mi² island is 20-40 moose, a density of 1-1.75 moose/mi². During a November 2011 survey, department staff counted 53 moose, approximately 2.3 moose/mi². Because of concerns of over-population and deteriorating habitat conditions, a drawing permit hunt for cows was initiated in 1995. In an attempt to reduce the population quickly, the Board established a registration hunt for any moose for the fall 1999 season. The population of moose on Kalgin Island is high at this time and remains above the objective of 20-40.

The "any moose" registration hunt is recommended to provide additional mortality 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 minimize the danger of over-harvest.

WHAT WILL HAPPEN IF NOTHING IS DONE? Without a liberal harvest including cows and calves, the population will continue to overuse forage resources and decline through starvation and reduced reproduction.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? If the island population size is kept at or near objective levels, moose will have adequate available forage and therefore, show less sign of being nutritionally stressed.

WHO IS LIKELY TO BENEFIT? Hunters who make the effort to get to Kalgin Island will have the opportunity to take any moose.

WHO IS LIKELY TO SUFFER? Seasonal residents of Kalgin Island have been concerned about hunters trespassing on their land and cabins. The current season dates concentrate hunter activity when most seasonal residents are present.

OTHER SOLUTIONS CONSIDERED? A general season for any moose will also work to lower moose densities, but would diminish the ability to collect biological information.

PROPOSED BY: Alaska Department of Fish and Game EG050712674

PROPOSAL 98 - 5 AAC 85.045 Hunting season and bag limit for moose. Modify the moose hunting season dates in Unit 16A as follows:

Open season for residents / nonresidents: September 1 – 30 with spike fork/50 inch.
Open season for residents only: December 9 – 15 with spike fork only.

ISSUE: Change hunting in Unit 16A back to the month of September 1- 30. It is way too hot to try to keep meat from spoiling in the field in August. Also, reinstate the one week in December for spike fork hunt.

WHAT WILL HAPPEN IF NOTHING IS DONE? Too many locals and weekend warriors don't and will not hunt in August because of meat spoilage. It's too hot.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, hunters can see and harvest for food to offset high cost of meat in the store.

WHO IS LIKELY TO BENEFIT? All people. We now kill so many with vehicles on the roads.

WHO IS LIKELY TO SUFFER? The poachers. No one I see.

OTHER SOLUTIONS CONSIDERED? Gives more opportunity to take the resource and stops all moose being killed on the road system.

PROPOSAL 99 – 5 AAC 85.045 Hunting season and bag limits for moose. Align the resident and nonresident moose season dates in Unit 16B as follows:

Review the most recent survey and harvest data for mainland Unit 16B and align the nonresident season with the resident season which is August 20 - September 25, unless the data shows a biological reason not to.

ISSUE: In March 2011, the Board of Game (board) re-opened a general nonresident moose season in the remainder of Unit 16B after being closed for over ten years. Because they didn't have any recent historical data on how much nonresident harvest to expect, they provided a lesser season for non-residents than for residents. The current general nonresident moose season (spike fork, 50 inch or 3 brow tines) for the remainder of Unit 16B is 22 days and the resident season is 37 days. Unit 16B remainder has much higher bull cow ratios than Units 14A, 14B, and 16A, which all have identical resident and nonresident seasons for spike fork, 50 inch or 3 brown tine bulls. When the board meets in 2013, new moose population and harvest data by residents and nonresidents should be available. Unless there are biological reasons to do otherwise, I would hope resident and nonresident seasons in mainland Unit 16B could be identical.

WHAT WILL HAPPEN IF NOTHING IS DONE? Surplus bulls in Unit 16B will continue to go to waste instead of providing needed game management funds to the state, and revenue and income to local businesses and guides.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Many areas of Unit 16B have bull cow ratios well above 50. So many surplus bulls can compete with cows and calves and slow population growth in a herd that we are trying to rebuild.

WHO IS LIKELY TO BENEFIT? Guides, local businesses, and the Department of Fish and Game from additional funding.

WHO IS LIKELY TO SUFFER? Some residents might notice increased competition from guides or air taxis that cater to nonresidents.

OTHER SOLUTIONS CONSIDERED? Option #2: Align all general season resident and nonresident moose seasons in Units 14A, 14B, 16A and mainland 16B to run from August 20 - September 25. I still like this option, but opted to only address Unit 16B because there might be resistance to making the season five days longer in Units 14A and 14B due to this past hard winter, even though the August 20 - 25 harvest shouldn't amount to much.

Option #3: Align all general season resident and nonresident moose seasons in Units 14A, 14B, 16A and mainland 16B to run from August 25 - September 25. I really like this option too and

feel it is the best plan for Units 14A, 14B, 16A and mainland 16B as a whole, but again, opted to deal only with Unit 16B because there may be resistance to a five- day reduction in the Unit 16B season, even though effort is limited in mid-August.

PROPOSED BY: Wayne Kubat

EG050912704

PROPOSAL 100 - 5 AAC 85.045 Hunting season and bag limit for moose Close the nonresident season in the Unit16 intensive management area as follows:

(14)

16A

[In areas of Unit 16A where intensive management is authorized, as defined in 5 AAC 92.125(d), nonresident hunting of moose is closed]

16B

[In areas of Unit 16B where intensive management is authorized, as defined in 5 AAC 92.125(d), nonresident hunting of moose is closed]

ISSUE: Nonresident sport or trophy hunting for moose populations with a positive Customary and Traditional (C&T) finding that are also identified in Unit 16’s intensive management plan as a region with a reduced moose population requiring intensive management to rebuild the prey populations. Areas that have too few moose for resident Alaskans.

Unit 16 has not met the *minimum* management population’s objectives for moose. Any excess bulls should be made available to resident Alaskans, including those that lost hunting opportunity in 2012 in neighboring Units 7 and 15 (Kenai Peninsula).

Moose populations are mandated by law to be a priority subsistence resource for Alaska residents by AS 16.05.255(13)d which states: “the taking of moose, deer, elk and caribou by residents for personal or family consumption has preference over taking by nonresidents”

The Alaska courts have also confirmed this: “the resident preference serves the purpose of conserving scarce wildlife resources for Alaska residents; this unquestionably represents a legitimate state interest” *Shepherd v. State, Dep’t of Fish and Game*, 897 P. 2d 33 (Alaska 1995.)

WHAT WILL HAPPEN IF NOTHING IS DONE? Nonresident hunters will continue to compete with resident Alaskans for limited subsistence resources in areas with a positive customary and traditional use finding for those subsistence resources, in particular, moose in Unit 16.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, reducing nonessential sport and trophy hunting will enhance the recovery rate of essential subsistence resources.

WHO IS LIKELY TO BENEFIT? Resident Alaskans that depend on subsistence resources in areas with depressed game populations, especially local residents living within intensive management areas trying to reduce prey harvest.

The Department of Fish and Game will benefit by having the authority to limit nonessential human harvest, an essential component of an effective adaptive management plan that promotes the recovery of depressed subsistence resources.

WHO IS LIKELY TO SUFFER? In the short term, nonresident hunters will lose the opportunity to hunt in areas where resident subsistence need exceeds the amount of available game. In the long run, nonresident hunters will benefit from healthy game populations in the region, especially trophy hunters.

OTHER SOLUTIONS CONSIDERED? Changing the Alaska statute that requires moose, deer, elk and caribou to be prioritized for resident harvest but that was unacceptable and contrary to the Alaska way of life.

Restricting nonresident hunting to remote subunits or non-prime hunting dates. This is unacceptable due to the fact that moose and caribou are highly migratory. Allowing nonresident harvest in any location of an active predator control area will adversely affect resident harvest potential and will reduce the overall recovery rate of the prey species.

PROPOSED BY: Science Now Project EG050912709

PROPOSAL 101 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Prohibit hunting with off road vehicles in Unit 16B until after 3:00 am following the day riding as follows:

I would like to regulate 4-wheeler and other off road ground transportation (hereafter referred to collectively as 4-wheelers) in a manner similar to the restrictions imposed on aircraft operations so that it is against the law to hunt or help someone else take a moose in Unit 16B until after 3 a.m. on the day following the day on which you have ridden on a 4-wheeler.

ISSUE: Rational: Unit 16B moose have been low in numbers for several years and the current winter is most likely going to set things back even further in regard to the moose population. Helicopters were made illegal for hunting many years ago, because it was determined that they gave hunters a very high advantage. Airplanes and boats were not included in this restriction, because they had limited access. Planes could only land on suitable lakes or rivers in the case of float operations, and there were limited spots available when operating on wheels; obviously boats required hunters to remain near navigable waters. Even though those means of transportation caused hunters to actually hunt on foot after landing, the further requirement was made that one had to wait until after 3:00 a.m. on the day following a flight before hunting.

At present, a growing number of hunters are able to travel over a great variety of area and terrain using 4-wheelers; some drive constantly through one swamp after another, destroying immense areas of habitat as the trails widen due to soft terrain, as they literally hunt from the machine. 4-wheelers have used them to gain an advantage similar to what was eliminated in the case of helicopters, as they are certainly a far more widespread method to cover ground than the traditional airplanes and boats. This proposal will allow hunters to use 4-wheelers to reach their hunting area, but following that, they must set up and hunt from a camp, just as pilots are now required to do. It will also allow them to retrieve a moose after it has been harvested, and this gives them an advantage over aircraft and boat hunters. Policing of this will not be easy, but in the current era when most hunters have either a cell phone capable of taking pictures, or a camera, they can aid in this effort and this possibility will help cause hunters to remain legal.

WHAT WILL HAPPEN IF NOTHING IS DONE? Some 4-wheeler operators will continue to drive around hunting from their 4-wheelers. This will result in more and more damage to the habitat. Swamps, in particular, will be damaged by the continually widening trails caused by constant travel. The headwater tributaries of salmon streams will be crossed more and more frequently as some drivers explore constantly. Moose will be continually harassed and pushed around by traffic. The hunting routines of those individuals who have traveled to their hunting area by boat, plane, 4-wheelers, and foot will be constantly disturbed, as they call, glass, and still hunt for moose near their camps. Moose will be continually harassed by the noise and movement of 4-wheelers.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. The habitat, both land, vegetation, and streams, will be damaged less by the reduced traffic. The moose will not be continuously pushed around and disturbed and may actually end up with some areas of sanctuary, because some spots will be too difficult to access from an established camp or cabin. It will cut down somewhat on the destruction of habitat, and will place all hunters on a more level playing field, by causing all hunting to once again be undertaken either by foot or when using a boat in the prescribed manner. It will reduce harassment of cows with calves as well as illegal bulls, since they would not be continually pushed around by 4-wheelers. It will have the effect of causing some sanctuary areas to develop in places too far removed from good camping locations and cabins.

WHO IS LIKELY TO BENEFIT? Who will benefit if your proposal is adopted? All hunters who set up a camp and hunt in the old traditional manner of glassing, calling, and still hunting will have a higher quality of hunt since they will not be disturbed by continual traffic of vehicles. Moose and other game will also benefit.

WHO IS LIKELY TO SUFFER? Who is likely to suffer if your proposal is adopted? Only those hunters who truly hunt from their 4-wheelers will have their method modified. Hunters will still be able to retrieve a moose after it has been harvested, using their 4-wheeler. This proposal will also make it more difficult for those individuals who illegally fly and then quickly return with a 4-wheeler, or have a friend in a plane while they hunt from their 4-wheeler, since they cannot hunt from their 4-wheeler. These illegal activities will be somewhat self-policing, since in this era, most hunters have either a camera or a cell phone which takes pictures. Anyone

seen harvesting an animal while driving their 4-wheeler is hunting illegally, and can be turned in by other hunters.

OTHER SOLUTIONS CONSIDERED?

PROPOSED BY: John Abrams

EG040512522

PROPOSAL 102 - 5 AAC 85.025(8). Hunting seasons and bag limits for caribou. Establish a drawing permit hunt for caribou in Unit 14A and a winter season that can be offered if harvest opportunity exists as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(8)		
Units 14 (A) and 14(B)	Aug. 10-Sept.20 <u>(Winter Season to be announced)</u> (General hunt only)	Aug. 10-Sept.20 <u>(Winter Season to be announced)</u>
1 bull [caribou] by drawing permit only [; UP TO 100 PERMITS MAY BE ISSUED]		
...		

ISSUE: Currently no season exists for caribou in subunit 14A although a fall caribou hunt is offered in the adjacent subunit of 14B. Anecdotal information suggests that a population of caribou inhabits the western Talkeetna Mountains year round in both 14B and 14A. The department plans to deploy radio-collars to evaluate the population’s size and status to determine if it is currently being underutilized. The collars will also be used to evaluate caribou movements and distribution. If the department determines that this population can sustain additional harvest a winter hunt may be offered. Expanding the existing draw permit hunt into subunit 14A will open more hunting opportunity and give the department more flexibility to manage this population.

WHAT WILL HAPPEN IF NOTHING IS DONE? Caribou seasons in Unit 14A will remain closed.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes; department biologists will have the flexibility to limit or expand hunts based on the ability of the population to sustain harvest.

WHO IS LIKELY TO BENEFIT? Hunters who want the opportunity to harvest caribou in 14A.

WHO IS LIKELY TO SUFFER? Those who disagree with harvesting caribou.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Alaska Department of Fish and Game

EG050412654

Proposal 103 - AAC 92.125 Intensive management plans. Review and modify the Unit 16 intensive management program and the progress that has been made towards meeting the program's objectives.

...

(d) **Unit 16 Predation Control Area:** the Unit 16 Predation Control Area is established, which is focused primarily on mainland Unit 16(B), and consists of all lands within the mainland portion of Unit 16(B) and that portion of Unit 16(A) west of a line beginning at the confluence of the Yentna and Susitna Rivers, then northerly along the western bank of the Susitna River to the confluence with the Deshka River, then northerly to 61° 48.80' N. lat., 150° 21.77' W. long., then west to 62° 01.47' N. lat., 150° 24.06' W. long., then north to the northern end of Trapper Lake at 62° 01.47' N. lat., 150° 16.67' W. long., then west to 62° 01.47' N. lat., 150° 24.06' W. long., then north to 62° 09.65' N. lat., 150° 24.06' W. long., then west to the southwestern end of Amber Lake at 62° 09.65' N. lat., 150° 33.42' W. long., then north to 62° 18.03' N. lat., 150° 33.42' W. long., then west to 62° 18.03' N. lat., 150° 51.04' W. long., then north to 62° 27.97' N. lat., 150° 51.04' W. long., then west to the Denali National Park boundary at 62° 27.97' N. lat., 151° 09.22' W. long., encompassing approximately 11,105 square miles; this predator control program does not apply within National Park Service lands unless approved by the federal agencies; notwithstanding any other provision in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf population reduction or wolf population regulation program in the Unit 16 Predation Control Area, conduct a black bear population reduction or black bear population regulation program in the Unit 16 Predation Control Area, and conduct a brown bear population reduction or brown bear population regulation program in that portion of the Unit 16 Predation Control Area draining into Cook Inlet between the south bank of the McArthur River and the north bank of the Beluga River:

(1) the discussion of wildlife population and human use information is as follows:

(A) prey population information is as follows:

(i) the moose population for mainland Unit 16(B) was estimated in fall 2010 to be 4,788 – 6,932 moose, based on aerial surveys in 2008 – 2010 in the unit; this population is composed of subpopulations that reside wholly in the unit; however, a subpopulation from the flanks of Mount Yenlo and in the upper Lake Creek drainage mixes in winter with moose from Unit 16(A) in the Kahiltna River drainage, and a subpopulation from the flanks of Mount Susitna and the drainages of Alexander Creek and lower Yentna River winters with moose from Units 14(A), 14(B), and 16(A) in the lower Yentna and Susitna Rivers;

(ii) habitat does not appear to be limiting the moose population, or a factor in calf survival, and is not expected to limit the moose population at objective levels; while the majority of the unit is covered with mature forests, moose habitat

has changed little since the high moose densities of the early 1980s; prescribed burning has been the only economically viable option for improving moose habitat and opportunities to conduct controlled burns are limited by climate, access, and privately-owned lands with structures dispersed throughout the unit; the minimum moose density objective is 1.0 moose per square mile for mainland Unit 16(B) based on the intensive management objective of 6,500 - 7,500 moose; there are approximately 6,500 square miles of available moose habitat; presently, mainland Unit 16(B) moose population estimates place the moose density at 0.90 moose per square mile;

(iii) the age structure of the population is believed to have shifted towards the older age classes in the late 1990s as recruitment decreased and the moose population declined; the number of yearling bulls estimated in the mainland Unit 16(B) survey data from 2008 - 2010 showed ratios of nine to 16 yearling bulls to 100 cows; assuming these numbers to be half of the year's cohort, this indicates an approximate yearling recruitment rate of 11 - 19 percent of the observed moose;

(iv) the bull-to-cow moose ratio for mainland Unit 16(B) in fall 2008 - 2010 was estimated to be 39 - 60 bulls per 100 cows; this is higher than the average bull-to-cow ratios of 24 - 44 observed in the unit in the mid-1990s; thus, the herd is presently above the management objective for this parameter;

(v) limited flights to count newborn calves and natality data from radio collared moose indicated that a minimum of 80 percent of adult cows over two years old gave birth, with 50 percent of these having twins; together, these data indicated a birth rate of approximately 122 calves per 100 cows or greater;

(vi) the calf-to-cow moose ratio during fall moose surveys from 2003 to 2005 ranged between 14 and 23 calves per 100 cows when a wolf predation control program was in effect, with estimated over-winter calf mortality of 40 percent, resulting in a calf recruitment rate of 8 - 14 moose per 100 cows; the calf-to-cow ratio during fall moose surveys from 2008 to 2010 ranged from 11 to 19 calves per 100 cows when black bear and wolf predation control programs were in effect, with estimated over-winter calf mortality of 12.5 percent, resulting in a calf recruitment rate of 10 - 17 moose per 100 cows; the increased calf recruitment in 2008 to 2010 is a result of the increased over-winter calf survival that is likely associated with reduced wolf predation during the winter months; information collected from radio collared moose in November following parturition indicate a five year average calf survival rate of 14.5 percent for calves six months of age or less in the northern portion of Unit 16(B); the results of a research study that used radio collars estimated a 20 percent survival rate for calves six months of age or less in the southern portion of Unit 16B during 2010; the reason for the difference between natality and recruitment is largely due to predation;

(vii) research studies of radio collared moose estimate that the adult cow survival rate is 90 - 95 percent;

(viii) the harvestable surplus for 2010 is estimated to be 250 bulls, which is above the minimum of 199 - 227 harvestable moose needed to meet the amount necessary for subsistence; the increase in harvestable moose is a result of the

increased bull to cow ratios likely due to the limited resident-only harvest since 2001 and increased bull recruitment;

(ix) the intensive management population objective established by the board for the mainland Unit 16(B) moose population is 6,500 - 7,500 moose, and the intensive management harvest objective is 310 - 600 moose;

(x) the decline in the mainland Unit 16(B) moose population is attributed to poor calf survival, high adult mortality, and the inability of the population to recover from the impacts of deep snow during the winters of 1984 and 1989; the mainland Unit 16(B) moose population is considered to be reduced substantially from the early 1980s when estimates ranged from 8,500 - 10,000 moose, and is currently below the intensive management population objective;

(xi) without the continuation of an effective wolf predation control program and an effective bear predation control program, moose in the mainland Unit 16(B) are likely to persist at low numbers or continue to decline; results from moose mortality studies, and predator and prey studies, conducted throughout Alaska and similar areas in Canada indicate that reducing the number of wolves and bears in unit 16(B) can reasonably be expected to increase survival of calves as well as older moose, particularly yearlings;

(B) the human use information for prey population is as follows:

(i) reported subsistence harvest has varied from 30 to over 120 moose, and some additional subsistence harvest occurs within the general fall hunting season (Tier I) when one is held; during the regulatory year 2006 – 2007, Tier II subsistence harvest was 104 moose; in regulatory year 2007 – 2008 the Tier II subsistence harvest was 126 moose; in regulatory year 2008 – 2009 the Tier II harvest was 146 moose; in regulatory year 2009 – 2010 the combined subsistence harvest was 206 moose;

(ii) high demand for subsistence moose is demonstrated by the 750 - 1,100 applicants who annually apply for the Tier II permits available for mainland Unit 16(B); additional subsistence demand exists within the unit and is captured by the limited general resident-only hunting opportunity that has occurred in September in recent years;

(iii) all general season and fall Tier II moose bag limits were reduced in 1993 to one bull with a spike or fork or 50-inch antlers or antlers with three or more brow tines on one side; nonresident moose hunting opportunity was first reduced to a portion of Unit 16(B) in 1993 and completely eliminated in 2001; all general season hunting was closed in 2001 and 2002 and only a limited Tier I subsistence (resident-only) season was allowed in 2003 – 2005 and 2009 – 2010; the average general season harvest was 388 from 1983 - 1989 and declined to 168 from 1990 - 1999;

(iv) there is a small, limited demand for moose to provide for rural federal subsistence hunting on federal lands within mainland Unit 16(B); there is some interest in moose for viewing opportunities in portions of the unit where guides and other operations provide services that promote wildlife viewing;

(v) it is unlikely that the demand in mainland Unit 16(B) for moose for subsistence and general hunting opportunity will decline; given the increasing human population in the nearby Anchorage and Matanuska-Susitna Valley areas,

as well as historic local subsistence use, it is probable that demand will match any increase in harvestable surplus gained through active management of the moose herd;

(C) the predator population information is as follows:

(i) the fall 2010 wolf population in mainland Unit 16(B) was estimated to be 40 - 79 wolves in 8 – 9 different packs; a density of approximately 0.6 – 1.2 wolves per 100 square miles; the spring 2007 population estimate for black bears in Unit 16(B) was 3,200 – 3,500; the estimate for brown bears in Unit 16(B) was 625 - 1,250;

(ii) habitat carrying capacity for wolves and bears is dependent on prey and food availability and competition from other predators; carrying capacity for wolves and bears in mainland Unit 16(B) has not been determined; however, harvest from sealing records, supplemented by reports from trappers, hunters, and others, have indicated that the wolf population had increased and the black bear and brown bear populations had stabilized or increased;

(iii) in mainland Unit 16(B), the current moose-to-wolf ratio is between 61 and 173 moose per wolf; the pre-control estimated ratio for 2003 was as low as 17:1; historically, estimates have ranged as high as 250 moose per wolf in this unit;

(iv) alternate prey include caribou, sheep, beaver, and hare; for most wolves in mainland Unit 16(B), there are few options for alternate prey; small populations of caribou and sheep exist in the higher elevations of the western side of the unit; however, pack territorial structure probably prohibits most wolves from accessing this resource, thus, limiting them to smaller prey such as beaver and hare; black and brown bears typically feed on salmon when available and forage on a variety of vegetation throughout the summer and fall; moose and caribou calves are often prey during the spring when inexperience with predators and limited mobility makes them particularly vulnerable; the limited numbers and distribution of caribou make them unavailable to most predation in mainland Unit 16(B); brown bears also take black bears as prey and this has been reported in numerous observations by hunters, trappers and others in mainland Unit 16(B);

(v) the number of moose that are killed by wolves in any given year in this area is highly dependent on the depth of winter snowfall, competition with other predators, and the abundance of alternate prey; in Alaska and areas of Canada where moose are the primary prey of wolves, studies documented kill rates ranging from four to seven moose per wolf per winter; using this range with our current population estimate of wolves in mainland Unit 16(B), wolves are estimated to be capable of taking between 160-553 moose per winter; research elsewhere in Alaska has indicated that up to 52 percent of neonate moose calves were killed by brown bears; other work has shown significant increases in calf survival following bear removal and population reduction;

(vi) research studies into the causes of moose calf mortality in Unit 16(B) estimated that 80 percent of the calves born during the summer of 2010 died within the first 6 months of life; of the mortalities that were investigated 50 percent were caused by brown bear, 22 percent were caused by black bear, six percent were caused by a bear but the bear species could not be determined based

on evidence found at the mortality site, 16 percent were caused by a predator but the species could not be determined based on evidence found at the mortality site, and six percent drowned;

(vii) mortality factors affecting wolves in mainland Unit 16(B) include human harvest, other wolves, and disease; harvest of wolves in the unit has increased from a low of two wolves in the winter of 1990 - 1991 to 50 wolves in the winter of 2003 - 2004; the total wolf take for 2004 - 2005 was 115 wolves, with 91 of those wolves taken in the predator control program that was initiated in January 2005; the average take of wolves from 2006 to 2009 is 24.8 wolves;

(viii) it is the intent of this plan to maintain wolves and bears as part of the natural ecosystem within the geographical area described for the plan; however, studies in Alaska and elsewhere have repeatedly concluded that annual reductions in wolf populations are required to reduce wolf population levels and predation on their prey; wolf harvest objectives in mainland Unit 16(B) have been set in order to achieve a reduction of at least 60 - 80 percent of the pre-control wolf population estimate of 175 - 180 wolves; to achieve the desired reduction in wolf predation, but ensure that wolves persist within the plan area, the wolf population objective for mainland Unit 16(B) is set at between 22 and 45 wolves; reductions in brown and black bear populations that have resulted in increased calf survival have been shown in other parts of Alaska and Canada; harvest objectives for black and brown bears in mainland Unit 16(B) were set with consideration for maintaining stable but lower populations of both species and reducing predation on moose calves;

(ix) without a predation control program in the mainland Unit 16(B) area, it can be expected that the wolf and black bear populations will increase; current trends in fuel prices, low fur prices, and low quality of wolf pelts in the unit due to the louse infestation, have resulted in a decrease in the wolf hunting and trapping effort in the area, thus, removing the major cause of wolf mortality; difficult access, thick cover, and the availability of other bear hunting opportunities have resulted in a failure to meet harvest objectives in the general season prior to the start of control activities; continuing the predator control programs is expected to reduce the predator populations and subsequently allow the moose population to increase toward the intensive management population objective;

(D) the human use information for predator population is as follows:

(i) annual harvest of wolves in mainland Unit 16(B) with a firearm, excluding same-day-airborne take, has been highly variable since the early 1980s and has ranged from 0 - 27 wolves; from 2005 to 2009, firearms have accounted for an average of 5 wolves annually, or 16 percent of the harvest; harvest of wolves with the use of a snare or trap has similarly been highly variable and has ranged from 1 - 48; from 2005 to 2009, traps and snares have accounted for six wolves annually, or 20 percent of the harvest;

(ii) mainland Unit 16(B) receives less trapping pressure than some other areas of the state; the hunter harvest of wolves has always been opportunistic, and is difficult to predict; the trapper harvest of wolves is limited by the number of trappers willing to spend the time targeting this furbearer amidst variable winter

travel conditions; winters have begun later, and have been highly variable in temperature and snowfall in recent years creating hazardous conditions for winter hunters and trappers; in addition to open creeks and regular overflow, many large rivers in the area have stayed open until late-winter, or even year-round, completely eliminated trapping pressure from remote areas of the unit;

(iii) most Unit 16(B) trappers will continue to pursue wolves in the unit regardless of same-day-airborne wolf control efforts; trappers in the unit pursue many different furbearers and do not consider the control program a detriment to their opportunities; if the wolf control program were to be discontinued trapper harvest would likely increase to some extent; hunters that take wolves in mainland Unit 16(B) do so opportunistically and would not be seriously affected by the status of the wolf control program;

(iv) annual harvest of black bears in mainland Unit 16(B) has been variable; the average annual harvest from 1980 - 1989 was 103.0 black bears, from 1990 - 1999 it was 92.0 black bears, from 2000 - 2004 it was 124.6 black bears, and from 2005 - 2009 it was 319 black bears; annual harvest of brown bears in mainland Unit 16(B) has increased; from 2002 - 2004 the average harvest was 23.3 brown bears and from 2004-2010 the average annual harvest was 106.6 brown bears;

(v) most Unit 16(B) bear hunters will continue to hunt bears in the unit regardless of bear control efforts; in fact, many hunters have reported hunting in the unit due to recently increased opportunities to take black and brown bears; guide use and resident hunter effort has not shown a decline since the board has authorized increased bag limits for brown bears, more black bear bait-hunting opportunities, and expanded seasons;

(2) the predator and prey population levels and population objectives, and the basis for those objectives, are as follows:

(A) the fall 2010 moose population was estimated to be 4,788 - 6,932 moose, compared to the intensive management objective of 6,500 - 7,500 moose; the intensive management objective was developed by the board based on historical moose population size and trends, habitat condition, sustainable harvest levels, and human use;

(B) the pre-control population of wolves in the fall of 2003 was 160 - 220 wolves; studies in Alaska and elsewhere have repeatedly concluded that annual reductions of wolves are required to diminish wolf population levels and predation by wolves on their prey; consistent with scientific studies and department experience, the objective of this plan is to substantially reduce wolf numbers compared to the pre-control level in order to relieve predation pressure on moose and allow for improved recruitment to the moose population; by maintaining the wolf population at objective levels, progress towards moose composition, population, and harvest objectives will be realized; this plan also has as a goal to maintain wolves as part of the natural ecosystem within the described geographic area; to achieve the desired reduction in wolf predation, but ensure that wolves persist within the plan area, the wolf population in mainland Unit 16(B) will be reduced to no fewer than 22 wolves;

(C) the spring (late winter) wolf population objective for Unit 16(B) was set at 22 - 45 wolves based on prior estimates of the wolf population size in the area when the moose population achieved high densities in the past;

(D) in spring 2007, the brown bear population for mainland Unit 16(B) was 625 - 1250 bears; the black bear population for mainland Unit 16(B) was 3,200 – 3,500 bears; significant reductions in the black bear and brown bear populations would reduce the amount of predation on moose while being consistent with the management goal of reaching a desirable predator-to-prey ratio by allowing the bear populations to decline;

(E) based on research in Alaska and Canada, a 60 percent or greater reduction in the bear population within the predation control area specified in this program is expected to result in an increase in moose survival; to achieve the desired reduction in bear predation, but ensure that bears persist within the predation control area, the minimum black bear population objective for the control area is 600 black and 250 brown bears, which represents an 81 percent reduction from the pre-control minimum estimated population of 3,200 black bears, and a 60 percent reduction from the pre-control estimated brown bear population of 625 brown bears;

(3) the justifications for predator control implementation plan are as follows:

(A) the board determined that the moose population in mainland Unit 16(B) is important for providing high levels of human consumptive use; the board established objectives for population size and annual sustained harvest of moose is consistent with multiple use and principles of sound conservation and management of habitat and all wildlife species in the area; the objectives of the predation control program are to halt the decline of the moose population within the predation control area and to increase the fall (post-hunt) moose population to the intensive management objective of 6,500 - 7,500 moose, providing a sustainable annual harvest of 310 - 600 moose;

(B) the population objectives for moose in mainland Unit 16(B) are not being met, largely due to high predator numbers and the inability of the moose population to recover given the high predation rates;

(C) a reduction in predator numbers is necessary to enhance survival of mainland Unit 16(B) moose, to halt the population decline, and to achieve population objectives in the predation control area; during the 1970s and 1980s, same-day-airborne hunting of wolves by the public, at little or no cost to the department, effectively kept the wolf population at levels well below present levels, both black and brown bear densities were low, and moose populations were increasing or stable; trapper and hunter harvests in the last 10 years have averaged less than 2.5 wolves per trapper and hunter;

(D) moose population objectives are not being met, although trapper and hunter harvests of wolves and harvests of black and brown bears have increased over the last 10 years for mainland Unit 16(B); [MAXIMUM HARVEST OPPORTUNITY APPEARS TO HAVE BEEN PROVIDED ALTHOUGH THE WOLF NUMBERS HAVE BEEN ABOVE THE POPULATION OBJECTIVE SINCE THE EARLY 1990S;] the [CURRENT] spring **wolf** population objective in the control area is 22 - 45 wolves in 3 - 5 packs[, AND THE FALL 2010 WOLF POPULATION ESTIMATE IS 40 – 79 WOLVES IN 8 – 9 PACKS]; the [CURRENT] population objectives **for bears** in the control area **are** [IS] 600 black bears and 250 brown bears;

(E) previous programs utilizing same-day-airborne hunting of wolves effectively kept the wolf population at levels well below present levels, and moose populations were increasing or stable; airplane-based control of wolf populations is necessary to reduce numbers over short periods of time and allows for a more timely recovery of the moose population; during moderate to severe winters wolves and moose congregate in river

corridors; expansion of the control program into portions of Unit 16(A) was necessary to effectively reduce wolves that occupy these corridors;

(F) multiple measures have been taken to improve survival of moose within mainland Unit 16(B); general predator hunting and wolf trapping seasons alone have failed to result in sufficient reductions of predators and increased numbers of moose; liberalization of seasons, bag limits, and other restrictions on harvest for bears and wolves have shown no detectable effect on the moose population in the unit; there has been a year-round season for black bear with a three bear limit and no tag required for brown bear with a two bear limit;

(G) presently known alternatives to predator control for reducing the number of predators are ineffective, impractical, or uneconomical in the Unit 16(B) situation; hunting and trapping conducted under authority of ordinary hunting and trapping seasons and bag limits is not an effective reduction technique in sparsely populated areas such as Unit 16(B); numbers of hunters and trappers are relatively low and so far have been unsuccessful in increasing the harvest of wolves or bears to the extent of having a positive effect on the moose population; the inherent wariness of wolves, difficult access, and relatively poor pelt prices also explain low harvest rates; application of the most common sterilization techniques, including surgery, implants, or inoculation, are not effective reduction techniques because they require immobilization of individual predators, which is extremely expensive in remote areas; relocation of wolves or bears is impractical because it is expensive and it is very difficult to find publicly acceptable places for relocated predators; habitat manipulation is ineffective because it may improve the birth rate of moose in certain circumstances, but it is poor survival, not poor birth rate that keeps moose populations low in rural areas of mainland Alaska; supplemental feeding of wolves and bears as an alternative to predator control has improved moose calf survival in experiments; however, large numbers of moose carcasses are not available for this kind of effort and transporting them to remote areas of Alaska is not practical; stocking of moose is impractical because of capturing and moving expenses; any of the alternatives to a predation control program are not likely to be effective in achieving the desired level of predator harvest;

(4) the permissible methods and means used to take predators are as follows:

(A) hunting and trapping of wolves by the public in the Unit 16 Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles as provided in 5 AAC 92.080;

(B) the commissioner may issue public aerial shooting permits or public land and shoot permits as a method of wolf removal under AS 16.05.783;

(C) hunting of black and brown bears by the public in the Unit 16 Predation Control Area during the term of the program will occur as provided in the hunting regulations set out elsewhere in this title, including use of motorized vehicles as provided in 5 AAC 92.080;

(D) the commissioner may reduce the black bear and brown bear populations within the Unit 16 Predation Control Area **by the** following methods and means under a department developed control permit:

(i) legal animal is any black bear, including sows and cubs; and any brown bear, except sows with cubs of the year, and cubs of the year;

(ii) no bag limit;

(iii) same-day-airborne taking of black bears if the permittee is at least 300 feet from the airplane;

(iv) same-day-airborne taking of bears if the permittee is at least 300 feet from the aircraft, including the use of any type of aircraft, such as fixed-wing aircraft or helicopter, to access bear baiting stations from April 15 through October 15; except that helicopters may not be used from August 5 through September 25;

(v) April 15 through October 15 baiting season for bears; up to four bear bait stations per permittee; bear baiting allowed along the Unit 16 shorelines of the Susitna River, Yentna River below the confluence with the Skwentna River, the Deshka River (Kroto Creek) below the confluence with Trapper Creek, and Alexander Creek outside a 100-yard buffer on each side of the river; bear baiting within one mile of a cabin if the cabin is on the opposite side of a major river system from the bear baiting station and other permit conditions are met; control permittees must possess a valid Alaska hunting license, except that a resident who is 10 - 15 years of age at the start of the season and has successfully completed a certified hunter education course and a department orientation for predator management, is allowed to hunt on behalf of a permit holder who is at least 16 years of age, under the direct immediate supervision of that permit holder, who is responsible for ensuring that all legal requirements are met; a control permittee may maintain and use another control permittee's bait station with written permission from the other control permittee;

(vi) same-day-airborne taking of bears if the permittee is at least 300 feet from the aircraft, including the use of any type of aircraft, such as a fixed-wing aircraft and helicopter, [TO ACCESS BEAR FOOT-SNARING CAMPS] from April 15 through October 15, except that a helicopter may not be used from August 5 through September 25; a helicopter may be used only to transport resident permittees, gear, and harvested bears and parts of bears directly to and from a foot-snaring camp; up to 10 helicopter permits may be issued at the discretion of the department and a permittee must attend a department-approved orientation course;

(vii) taking of bears by foot snaring by permit only from April 15 through October 15; [IF FOOT SNARING IS BASED OUT OF REMOTE CAMPS, NO MORE THAN FIVE FOOT SNARING CAMPS MAY BE IN OPERATION AT ANY TIME, AND AT LEAST TWO PERMITTEES MUST BE PRESENT IN EACH CAMP] **permittees must be accompanied by another person, age 16 or older,** when **conducting foot snaring activities** [FOOT SNARES ARE] in the field; foot snaring permits will be issued at the discretion of the department based on previous trapping experience, ability to help train other participants, and length of time available for participation in a snaring program; a selected foot snaring permittee must successfully complete a department-approved training program, must be a resident 16 years of age or older, and report all animals taken by the permittee to the department within 48 hours of taking;

(viii) foot snares may only be placed on the ground directly under the bucket snare or in buckets and must be checked by the permittee at least once each day;

(ix) all brown bears that are cubs of the year or a sow accompanied by cubs of the year incidentally snared must be immediately reported to the department; if practicable, an incidentally snared brown bear will be released by department staff; no more than 10 incidentally snared brown bears may be killed each year by all snaring permittees in the aggregate; hides and skulls of incidentally snared brown bears are the property of the state and must be salvaged and delivered to the department;

(5) the anticipated time frame and schedule for update and reevaluation are as follows:

(A) through July 1, 2017, the commissioner may reduce the wolf and bear populations in the Unit 16 Predation Control Area;

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

(6) other specifications that the board considers necessary are as follows:

(A) the commissioner will suspend wolf control activities

(i) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers below the management objective of 22 - 45 wolves specified in this subsection;

(ii) when spring conditions deteriorate to make wolf control operations infeasible; or

(iii) no later than April 30 in any regulatory year;

(B) the commissioner will suspend black bear control activities

(i) when black bear population inventories or accumulated information from permittees indicate the need to avoid reducing black bear numbers below the management objective of 600 black bears specified in this subsection;

(ii) no later than June 30 during any regulatory year;

(C) the commissioner will suspend brown bear control activities

(i) when brown bear population inventories or accumulated information from permittees indicate the need to avoid reducing brown bear numbers below the management objective of 250 brown bears specified in this subsection;

(ii) no later than June 30 during any regulatory year

(D) predator control activities will be terminated

(i) when prey population management objectives are attained; or

(ii) upon expiration of the period during which the commissioner is authorized to reduce predator numbers in the predator control plan area;

(E) the commissioner will annually close wolf hunting and trapping seasons and bear hunting seasons as appropriate to ensure that the minimum population objectives are met.

ISSUE: This proposal was submitted to by the Department of Fish and Game to prompt a review of the Unit 16 intensive management program and the progress that has been made

towards meeting the program's objectives. The proposal also recommends minor changes to the regulation to eliminate requirements that are no longer necessary.

Intensive management of predators began in 2004 when the public was first authorized to take wolves from the air with the goal of reducing the wolf predation on moose, and improvements in overwinter survival rates of moose were observed. The program was modified to address limitations imposed on the moose population by black bear predation in 2007 and brown bear predation in 2011. To date, liberalizations made to reduce bear numbers have not been effective at reducing the bear population to the intensive management program's objectives and the Department has not been able to document an increase in moose survival or recruitment that can be attributed to the bear control programs.

During the February 2012 Board of Game meeting, the department will provide a review of the program, progress made towards objectives, and the results of a 2012 moose calf survival study.

WHAT WILL HAPPEN IF NOTHING IS DONE? The Unit 16 intensive management program will continue to be conducted with no changes to the program or its objectives.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? A review of the program will allow the Board of Game to evaluate population objectives for moose, wolves and bears and allow the board to tailor program in a manner that best serves the public.

WHO IS LIKELY TO BENEFIT? None

WHO IS LIKELY TO SUFFER? None

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050412651

PROPOSAL 104 - 5 AAC 84.270. Furbearer trapping, and 5 AAC 92.125 Intensive management plans. Prohibit the snaring of bears in the Central/Southwest Region.

Snaring of bears is illegal in Central/Southwest Region (Game Management Units 9, 10, 11, 13, 14A, 14B, 15, 16, 17).

ISSUE: The Department of Fish and Game (ADF&G) does not have the data to insure that bears will not be overharvested by the use of snaring, especially combined with an absence of bag limits, open seasons, and newly approved methods of take. Bear snaring is controversial and not tolerated by the public as an acceptable method of take. Authorizing a black bear trapping season in Alaska, especially in areas bordering National Parks; Preserves is inappropriate and will invariably have a negative impact on bear populations in our National Parks & Preserves as well as present an unacceptable safety risk to the public. Bear snaring in areas of high use is not

only dangerous, but is not the highest use of this resource. Wildlife viewing is an important part of our state's economy and brings valuable economic development of any communities and businesses around the state. Though touted as safe, humane and effective way to kill bears, we, along with thousands of Alaska would disagree. Bear snaring has not been legal in Alaska since statehood for many good reasons, including the following:

Safety: Allowing bear snaring stations as close as 1/4 of a mile from residences, roads and trails is anything but responsible and safe. There is no way for the public to know where bear snaring is taking place. Fish and Game currently does not provide a map or locations where bear snaring bait stations are located thereby putting the public at risk of inadvertently encountering a free-roaming adult or sibling of a bear caught in a snare as they recreate during the summer.

Humane: The practice of baiting a bear and snaring it is anything but humane. Unless there is someone attending the site (which is not required) and can kill the bear immediately upon capture, we seriously doubt that a bear doesn't suffer as a result of being snared. Indeed, the ADF&G had to kill several brown bears due to injuries received from struggling to free themselves after being caught in a snare in Unit 16. The fair chase ethic that many Alaskans abide by is affronted by the practice of bear snaring. Bears have been and remain an iconic species that deserves better treatment than this.

Effective: Bear snares are indiscriminate, allowing the capture of brown bears, sows with cubs and cubs. This method of culling is not only socially unacceptable but is inconsistent with modern wildlife management practices. Bears have a relatively low reproductive rate and the taking of sows with cubs and cubs has been universally discouraged over the years. With the singular focus of ADF&G to boost ungulate populations, there is still little evidence that intensive management works over the long term. Many areas where intensive management has been conducted has resulted in reduced twinning rates, reduced growth of calves, increased age of first reproduction, and poor body condition including starvation in extreme situations.

WHAT WILL HAPPEN IF NOTHING IS DONE? It is likely that bears will become a diminished resource as a result of the new policy. More people and pets will be faced with a public safety issue. The tourism industry will suffer. The classification of bears as furbearers is a wasteful and inappropriate use of the resource. Bears could become food-conditioned, thereby creating a potential hazard for people.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, bear snaring is an indiscriminate method of take. A trapper can still harvest a bear under a trapping license by using a firearm and bait station to attract a free roaming bear. Under this method, a trapper can be selective in harvesting the bear and avoid taking non-target species and cubs or females with cubs. Bear snaring is a wanton waste of our resources.

WHO IS LIKELY TO BENEFIT? Alaskans and visitors who value wildlife and sound biological management of our wildlife resources, and who want the opportunity to view wildlife in our national and state parks.

WHO IS LIKELY TO SUFFER? No one will suffer. This practice only promotes waste and disrespect for wildlife.

OTHER SOLUTIONS CONSIDERED? Reverse the decision to classify black bears as a furbearer.

PROPOSED BY: Valerie Connor EG050212622

PROPOSAL 105 - AAC 84.270. Furbearer trapping, and 5 AAC 92.125 Intensive management plans. Prohibit the snaring of bears in the Central/Southwest Region as follows:

Snaring of bears, black and grizzly, would be prohibited in the Central/Southwest Region. The only exceptions would be for state wildlife personnel under specific emergency situations where a bear or bears have become a public nuisance or danger. Even then, it should be used only as a means of relocating the bears.

ISSUE: Snaring of bears, both black and grizzly, is being instituted in various areas of the state either on a public-activity basis or an experimental basis. With the classification of black bears as a furbearer subject to trapping, there is an incentive to take them in large numbers regardless of gender or the presence of dependent offspring. The result for an species with an extremely low reproductive rate is that both the present and the next generation are subject to removal from the population without any real regard to management. Bears caught in snares will be killed and any management changes to that situation would only take place after the damage is done.

WHAT WILL HAPPEN IF NOTHING IS DONE? For one thing, wildlife management in Alaska as viewed by both residents and non-residents, will decline further in credibility and public acceptance. There is no real justification for this method or increased take, a position held by many Alaskans. Yet, it is being proposed by a handful of interested parties who have no reason other than yet another way to kill bears. Bear-baiting, which is repugnant to many, both hunters and non-hunters, gives enough opportunity that snaring is not justified. Too, enforcement by the wildlife division of the Alaska State Troopers is apt to be spotty at best. Presently, we have less than 100 wildlife troopers for the entire state. They are already stretched very thinly in terms of manpower and resources just trying to maintain the hunting/trapping regulations already in effect. To expect them to additionally take on the burden of having to inspect a flood of snaring sites is likely to overwhelm their capabilities and lead to poorly-maintained sites without any real enforcement. Additionally, there are the dangers to hikers and other non-consumers using the land who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The humaneness often touted as a feature of these snares is debatable. For an animal that has never been restrained to suddenly be unable to move more than a few feet in any direction is very likely to produce a considerable and stressful reaction. As the present proposals allow 3 days between checking snares, this means any bear caught will be going that entire period without water or food or the ability to protect itself against any other predator. That's assuming the snares are checked according to schedule. Therein again rises the problem of enforcement. Should a sow with cubs be caught, the cubs will be stressed severely by their

mother's response. Equally, if a cub is caught, there will be an extremely stressed bear sow roaming the area.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? With liberal bear hunting seasons and bag limits, the widespread use of bait-stations, the onslaught against bears in Alaska has been increasing. This is a species with a low reproductive rate yet it has high value as a tourism draw with bears being one of the “big three” species most often cited as viewing opportunities. Rather than indiscriminate killing of bears, they should be managed with a view towards their vital role in a healthy environment. It is much easier not to create problems at the onset as opposed to trying to repair damage after it has been done.

WHO IS LIKELY TO BENEFIT? Viewers of wildlife, both resident and non-resident, will benefit from the opportunities these animals present. In 2008, the entire revenue from hunting/trapping fees and licenses totaled \$124 million while the revenue from tourism was over \$538 million. Additionally, the ethical hunter that believes in fair chase will benefit by not having to deal with snare sites and the attendant problems and dangers thereof. The indiscriminate killing of bears would negatively impact healthy, sustainable bear populations, a situation affecting both hunters and non-hunters.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Remove bears from the furbearer classification. I do not reject this; I heartily endorse it. With snaring in place, the opportunity for a black market in bear gall bladders is greatly enhanced as is the waste of bears. There is not a huge demand for bear pelts and not all bears taken by this method will have suitable pelts. The probability of wastage is high.

PROPOSED BY: Alaska Wildlife Alliance EG042912576

PROPOSAL 106 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear, and 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Open Unit 16 to brown bear baiting for residents and nonresidents in the spring and fall as follows:

We propose a spring brown bear baiting season from April 15th to June 30th and fall season from August 20th to October 31st. It would be open for both residents and nonresidents.

ISSUE: There is a large population of brown bear and black bear in Unit 16 and because of the limited access in this unit and it being heavily treed it is difficult to hunt bears in this Unit without bait. Brown bear and black bear together predate about 70% of moose calves in this Unit. Currently only residents can hunt brown bear over bait and that is only with a predator control permit. We propose having a general season that allows both residents and nonresidents to hunt brown bear over bait in Unit 16, with both a spring and a fall season. We have just had a severe winter and set a record for snowfall. We are sure this will have a very negative impact on

the moose population with a large winter kill and we need to have an increase in harvest of all bears in this Unit.

WHAT WILL HAPPEN IF NOTHING IS DONE? There will continue to be a large population of both brown and black bear that are under harvested in this Unit and they will have a negative impact on a struggling moose population.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Taking brown bear over bait will give hunters more opportunity to evaluate hair quality and size and the possibility of seeing more bears.

WHO IS LIKELY TO BENEFIT? All bear hunters will have more opportunity to harvest brown bear without having to participate in a predator control program. The increase in harvest of both bear species will reduce the predation on moose calves and help the moose population rebound.

WHO IS LIKELY TO SUFFER? Nobody will suffer.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Matanuska Valley Advisory Committee EG042412547

PROPOSAL 107 - 5 ACC 85.020 Brown Bear Season and Bag Limits. Retain the current no closed season for brown bear in the remainder of Unit 16B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(14)		
Remainder of Unit 16(B)	No closed season	No closed season
2 bears every regulatory year		

ISSUE: The current brown bear season in Subunit 16B will expire in 2013 unless it is reauthorized by the Board of Game (board). When the regulation expires the season will revert to the former dates of August 10 to May 31.

During the March 2011 Board of Game meeting in Wasilla, the board liberalized the brown bear hunting in Subunit 16B by establishing a year-round season to increase bear harvests and reduce brown bear predation on moose calves. Moose population and harvest objectives have not been

met for several years for Unit 16B and are currently below intensive management objectives. Department research conducted since 2004 has shown that brown bears and black bears are important predators of moose calves and that calf recruitment is limiting population growth and recovery in the area.

WHAT WILL HAPPEN IF NOTHING IS DONE? Brown bear hunting in Subunit 16B will revert to a August 10 to May 31 season.

WHO IS LIKELY TO BENEFIT? Hunters who wish to have the opportunity to harvest a brown bear between June 1 and August 9.

WHO IS LIKELY TO SUFFER? No one

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game EG050412649

PROPOSAL 108 - 5 AAC 92.125(d) Intensive management plans. Suspend/relax the intensive management of wolves in Unit 16 as follows:

Amend 92.125(d) to achieve a reduction of 0–30% of the pre–control wolf population estimates of 160 to 220 wolves in Unit 16B.

Determine a pre-control wolf population in Unit 16A, and set a wolf population reduction objective of 0 – 30% of that population estimate. Amend the intensive management (IM) plan to reflect this finding for Unit 16A.

ISSUE: Intensive management of wolves in Unit 16, including the lack of wolf population objective for Unit 16A in the IM plan.

The most recent Department of Fish and Game (ADF&G) moose calf mortality data (2010) reported zero newborn moose calf mortality attributed to wolves, yet the board continues to aggressively reduce the wolf population in Unit 16; the population objective for wolves in Unit 16B is a minimum of only 22 wolves.

In Unit 16A, the aerial gunning of wolves borders Denali State Park and borders where the objective to maintain a minimum population is not even identified in the plan, so within the IM area in Unit 16A, the reduction of the wolf population to zero appears to be authorized as long as at least 22 wolves are “estimated” to remain in Unit 16B.

The current objective authorizes reductions of wolves to a density of just 1 wolf / 500 mi². Such a low density is not justified when compared to the 2010 moose calf mortality data and adult female moose survival rates.

The ADF&G have long stated that the minimum wolf IM objective has been met in Unit 16 with the combined take of aerial hunting and ground based harvest, including trapping and sport hunting harvest rates, yet the department has virtually no scientific survey or census data to verify that, at minimum, 22 wolves remain in the 11,000 mi² identified in the plan. Instead the department relies on anecdotal information, including what can only be assumed to be biased reports from permitted aerial SDA pilots and gunners.

In 2009, the ADF&G reported to the board: “The spring population objective of 22 – 45 wolves in Unit 16B was most likely achieved as we estimated between 38 and 49 wolves for the unit”

The total harvest of wolves (hunt, trap, SDA) to achieve this low population density was 41 wolves, it is likely that few resident wolves, if any, remain in the 11,000 mi² defined in this IM plan.

Unit 16 is bordered by Denali State Park and two National Parks. Low densities of wolves within the IM region bordering these parks creates a density “sink” whereby wolves emigrate out of the park to fill the “void” created by the states intensive management program in Unit 16. It can be reasonably assumed that resident wolf populations that reside primarily in both state and federal parks are harvested in the bordering aerial gunning that occurs in Unit 16.

The IM plan specifically states that adult cow survival rates are between 90 – 95%. The state has no direct evidence in Unit 16 to support the assumption that excessive predation by wolves on adult cows, or neonates, would result from ending, or relaxing, the intensive management of wolves in this program.

WHAT WILL HAPPEN IF NOTHING IS DONE? Wolf populations in Unit 16 will be unnecessarily reduced to unacceptable low densities, which may result in a significant increase in the coyote population.

Wolf populations primarily inhabiting Denali State Park, Denali National Park & Preserve, and Lake Clark National Park will be harvested in the states SDA program as wolves in these higher density regions emigrate to low density regions within the 11,000 mi² aerial wolf control zone bordering these parks and preserves. This negatively impacts other users of the resource; in particular, the wildlife viewing public which primarily visits state and national parks to view wildlife, and in particular, wolves.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, wolves provide a highly sought after resource for subsistence and sport trappers. The financial return for wolf pelts is one of the highest for any species in Alaska. Allowing the wolf population to return to a more natural regulated density to the maximum extent possible will promote higher sustainable harvest for both trapping, who value the economic return, and sport hunters, who value the wolf as a trophy animal.

WHO IS LIKELY TO BENEFIT? The ADF&G will benefit by having a region where coyote densities are minimized by naturally regulated wolf populations. Wolves and coyotes do not get along and the ADF&G, as well as the resident subsistence hunter, has much more to lose by

allowing coyotes to increase unchecked, than they do in restoring a natural balance in the wolf population.

The wildlife viewing public who visit Denali State Park and National Park are there to primarily view wildlife, in particular, wolves. State actions that may reduce the wolf populations in parks should be conservative, and for the shortest duration possible.

WHO IS LIKELY TO SUFFER? Those who consider the only good wolf, a dead wolf.

OTHER SOLUTIONS CONSIDERED? Revoking the IM plan entirely. To achieve the goals of increasing moose densities while simultaneously authorizing nonresident trophy hunting for moose in the same region, the board is handicapping the ADF&G's ability to adaptively manage human harvest and is assuming significant ecological risk in doing so. But, it appears prudent, science based management of nonresident hunting opportunity is not an option with the current Board of Game.

PROPOSED BY: Science Now Project

EG050912707

Regional and Multiple Units

Note: The Board of Game does not have authority to remove the guide requirement for hunting certain big game animals or to increase permit and tag fees.

PROPOSAL 109 - 5 AAC Chapter 85. Season and bag limits. Open resident hunting seasons ten days before nonresident seasons, allocate 90 percent of harvest to residents; remove guide requirements, and increase tag and permit fees for Central/Southwest Region Units as follows:

ALL resident hunting seasons for ALL species 10 days prior to nonresident hunters. Remove the guiding requirement for sheep, goats, and brown bears. Raise ALL nonresident harvest tags and permit fees. Allocate 90% of harvests to residents and 10% to non-residents.

ISSUE: I would like the Board of Game to address the problem of favoring guides and their nonresident clients over the needs of Alaskan Residents. Specifically, I would like the Board of Game to address the declining hunting opportunities residents are facing and the competition we face from the guiding industry in filling our freezers.

WHAT WILL HAPPEN IF NOTHING IS DONE? Residents will continue to see their hunting opportunities diminish. The Board of Game and the Guiding industry will continue to claim that non-resident hunters provide monies for the management of our game and bring in much needed dollars to the State when in fact they don't. Residents live here, spend their money YEAR round, buy services and goods YEAR round and support a multitude of businesses in their pursuit of game. The Alaska Department of Fish and Game spends about \$42 million dollars per year in support of the Commercial Fishing Industry, yet only receives about \$16 million in revenue from the Commercial Fishing Industry. Clearly, if the Department of Fish and Game--and the Board of Game --were concerned about much needed dollars, we can find savings in other avenues.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? You bet. We live here and these are OUR resources. Not the feds, not nonresidents, and surely not the Guides. The Board of Game needs to start to manage our wildlife for Alaskan Residents and we have seen for too long now, declining populations of our game and most especially, declining hunting opportunities for us and our children. The future does not look bright if we continue--if you, the Board of Game, continue, to manage our wildlife species the way you have. We have an excellent Department of Fish and Game--some of the best and brightest biologists in the world--yet your actions, and in many cases, lack of action--has made them ineffective as managers.

WHO IS LIKELY TO BENEFIT? Alaskan Residents--and that's all that really matters. That and our game resources. This should be the metric for each and every decision you make. Does it help the Alaskan resident--current and future? Your last meeting on the Interior failed in this regard on several fronts.

WHO IS LIKELY TO SUFFER? Guides and the guiding industry and that is fine with the vast majority of ALASKANS.

OTHER SOLUTIONS CONSIDERED? Continue on the same management path as you have--and that is unacceptable. It is time to put Alaskans first. It is time to think of Future Alaskans--specifically, our children. These are our game resources--we expect you to manage them for our benefit and for our children's benefit. The Board of Game--current and past-- has failed to do this, and I reject this as being acceptable.

PROPOSED BY: Jake Sprankle

EG043012587

PROPOSAL 110 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open resident sheep seasons seven days before nonresident seasons for the Central/Southwest Region Units as follows:

Resident hunting season for Dall sheep shall be August 3rd to September 20th. Nonresident hunting season shall be from August 10th to September 20th. Drawing permit areas will start seven days earlier for Alaska residents and if there is a split season, the second half will be shortened by seven days for nonresidents such that residents can start the second half seven days prior to nonresidents.

ISSUE: The Board of Game needs to address the lack of full curl legal rams available to Alaska residents. While sheep populations have been stable to slightly declining, the availability of legal rams, much less trophy rams, has been significantly reduced and is in serious decline. Success rates for resident sheep hunters will never be on par with nonresidents if not allowed an earlier jump from the efficiency of their guides.

WHAT WILL HAPPEN IF NOTHING IS DONE? Alaskan resident hunters will continue to suffer from the mismanagement of this species by the Board of Game. Alaskan youth will never have the opportunity afforded to their parents and grandparents to successfully hunt healthy populations of Dall sheep with ample populations of large rams. Alaska wildlife belongs to all Alaskans and these resources should be managed as such.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. Resident hunters will have an improved quality of hunt and avoid conflicts with guides and their clients. Nonresident hunters will have an improved quality of hunt by avoiding conflicts with resident hunters. Transport services associated with sheep hunting will improve as this will lessen the bottleneck on transporters seen at the beginning of each season, especially during poor weather. This may also increase the safety of hunters and transporters by spreading out the season and users more. Current Alaska residents and future Alaskans may be more interested in hunting Dall sheep, its management, and the future of Dall sheep hunting if they had greater opportunity to locate and harvest a legal ram, much less quality rams.

WHO IS LIKELY TO BENEFIT? Alaska residents, Alaska youth, and future Alaskans. Dall sheep populations may also improve as more people may feel like they have a chance at successfully harvesting a quality ram and will be more interested in the management of the resource. This benefits Alaska, all of Alaska's game resources, and the Alaska Department of Fish and Game.

WHO IS LIKELY TO SUFFER? No one, though some will say nonresident hunters, nonresident guides, and resident guides may suffer. Harvest records, however, show that resident sheep hunters are much less successful than nonresidents because of their guides. This is largely due to time guides can give to pre-season scouting, which is done mostly by fixed wing aircraft. While success rates for resident hunters will hopefully increase, there is little reason to think that nonresident success rates will decline significantly. Pre-season scouting will still be available to guides. Sheep populations will not suffer directly - again because resident hunter success rates are consistently low. Future sheep populations, however, may suffer and receive little support or interest, if today's youth and future generations cannot hunt healthy populations of sheep, as is currently the case. You will be hard pressed to find any Alaska resident who is not a guide or associated with a guiding business, who does not favor this proposal. If not sure whether to favor Alaska residents over nonresidents, please look at any other state and how they manage their resources for the benefit of their residents and not for the financial benefit of a few.

OTHER SOLUTIONS CONSIDERED? Close nonresident hunting of Dall sheep for five years or until healthy populations of sheep with sufficient populations of legal rams is re-established. Charge resident hunters non-resident harvest fees during this interim to offset any loss of funding from loss of non-resident tags. This would be the best management practice the Board of Game (board) could do, as it would best serve current and future Alaska residents, and most of all best serve the Dall sheep population as a whole. I rejected this solution based on past performance of the board where political and financial interests of a few, trumped the best interests of Alaska residents, Alaska game resources, and Alaska itself.

PROPOSED BY: Jake Sprankle EG042412552

PROPOSAL 111 - 5 AAC 85.055. Seasons and bag limits for Dall Sheep. Open resident sheep seasons seven days before nonresident seasons for the Central/Southwest Region Units as follows:

Region IV Units - Season Dates for Dall Sheep:
Residents: August 5th – September 20th
Nonresidents: August 12th – September 20th

ISSUE: Preference for Alaska residents to have an early start date for Dall sheep hunting.

WHAT WILL HAPPEN IF NOTHING IS DONE? Alaskans will keep experiencing conflict in the field with commercial operators (guides) and overcrowding will diminish the quality of the hunt for residents. All of the western states have high allocations of game (usually 90%) for their residents and about 50% of Alaska's sheep are harvested by nonresidents, which would

never be allowed in other states. The lack of a quality experience and the diminishing number of legal rams is causing a reduction in the number of Alaskans wanting to hunt and enjoy a resource we all own.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? More legal rams would be harvested by residents and our youth would have an opportunity to have a positive experience sheep hunting. All sheep hunters would not be trying to enter the field on the same day and the air taxi services wouldn't be so overloaded – generally a safer situation for all hunters. An early start date would extend the time for entering the field, creating less conflict between resident and nonresident hunters.

WHO IS LIKELY TO BENEFIT? All Alaskans – especially our youth. Nonresidents will also have a better experience because many residents will be out of the field when they enter creating more solitude for their hunt.

WHO IS LIKELY TO SUFFER? Commercial operators will complain but they are using a resource we all own. Other states don't force nonresidents to use a guide and they have high game allocations for their residents (usually 90%). Nonresident guides can't legally hunt sheep, goats, and brown bears themselves but they enjoy and make money on a resource owned by all Alaskans. This is not anti guide or nonresident but PRO – ALASKAN.

OTHER SOLUTIONS CONSIDERED? The Board of Game has been very kind to the guiding industry at the expense of the resident hunter. Nonresident tag fees bring a lot of money to the state and this helps support the Department of Fish and Game. How do other western states survive giving their residents high allocations of game? Other western states require nonresidents to apply for drawing permits (elk, deer, antelope, bear, sheep, goat, moose, cougar, etc.) 6 to 8 months in advance of the season, they have a preference point system, and high tag fees with no guide requirements. They make money to support their programs and give their residents very (usually 90%) high allocations of game. Nonresidents can come to Alaska the day before hunting season and buy a nonresident tag over the counter the day before the season at a fraction of the price other states charge. Why doesn't Alaska manage game for residents and our Department of Fish & Game like other states? If the Board of Game doesn't start showing some preference to residents, Alaskans need to contact the governor and their representatives asking them to confirm board members who put residents as priority #1 or vote for politicians that support a preference for Alaska residents.

PROPOSED BY: Tom Lamal and Darcy Etcheverry EG043012578

PROPOSAL 112 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open resident sheep seasons five days before nonresident seasons for Central/Southwest Region Units as follows:

Region II Units - Season Dates for Dall Sheep:
Residents: August 5th - September 25th
Nonresidents: August 10 - September 20th

ISSUE: Early start date and later ending date for Alaskan resident sheep hunters

WHAT WILL HAPPEN IF NOTHING IS DONE? The overcrowding will just get worse. The Brooks Range was a zoo in 2011, the other ranges will become that way soon. If there isn't a fix there will be more upset hunters. Then we will get some new Board of Game members

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Alaskan residents will be given a better chance to enjoy this state to harvest meat for their family. There won't be such a scramble by so many different hunters trying to get any legal sheep,

WHO IS LIKELY TO BENEFIT? Alaska residents and Alaskan game!

WHO IS LIKELY TO SUFFER? Guides.

OTHER SOLUTIONS CONSIDERED? Make ALL guides in Alaska that guide out of state hunters for sheep, bear and goat be Alaskan residents (live here year round) not just for the guiding season) if an out of state hunters needs a guide to hunt these animals, then out of state guides are not qualified. I rejected this idea because that would be a huge hit to the guiding industry.

PROPOSED BY: Jacques Etcheverry

EG043012593

PROPOSAL 113 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open resident sheep hunting seasons five days before nonresident seasons for the Central/Southwest Region as follows:

Region II Units - Season Dates for Dall Sheep:

Residents: August 5th to September 20th

Nonresidents: August 10th to September 20th

ISSUE: The Board of Game needs to address the serious problem of overcrowding at the start of the sheep season and the lack of legal rams for the resident hunters. Alaska wildlife is 1st and foremost for the Alaskan resident.

WHAT WILL HAPPEN IF NOTHING IS DONE? The conflicts between resident and nonresident hunters will continue to increase and the overall successful hunting experience for both groups will decline.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Both the resident and the nonresident hunters will have an improved hunt by avoiding conflicts between the two groups. This will also improve safety by not having everyone rush into the field at the same time.

WHO IS LIKELY TO BENEFIT? All Alaskan residents.

WHO IS LIKELY TO SUFFER? In my opinion no one would suffer, but the non-resident and resident guides will say that they will suffer.

OTHER SOLUTIONS CONSIDERED?

PROPOSED BY: Leonard Jewkes EG042912573

PROPOSAL 114 - 5 AAC Chapter 85. Seasons and bag limits. Open resident hunting seasons seven days before nonresident seasons for Central/Southwest Region Units as follows:

Whatever opening date is determined for any species, the new regulation would indicate the opening for nonresidents would be seven days later.

ISSUE: Big Game hunting for residents opens seven days before non-residents for all big game.

WHAT WILL HAPPEN IF NOTHING IS DONE? This proposal will allow resident hunters to have a seven day early access period to hunt game populations without interference from nonresident hunters who may be utilizing professional guide services or hunting on their own. Opening day numbers would be thinned out, transporters would be able to cater to more people, or at least spread the movement of people over more days. The result would be a less chaotic experience for everyone.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? This proposal would improve the hunting experience for the Alaska resident. Our State Constitution indicates the wildlife resources belong to the people of Alaska. It should only be considered as fair for the people to have access to our wildlife without interference from nonresidents. Other States use staggered starts with nonresidents for hunting seasons and the same benefits should be extended to Alaskans.

WHO IS LIKELY TO BENEFIT? Everyone will benefit from this proposal. Residents will have an opportunity to pursue game in a less crowded field. Nonresidents would have the same type of experience. With opening day being thinned out the remainder of each season would be much smoother.

WHO IS LIKELY TO SUFFER? I can't see any group suffering from this proposal. Hunting pressure would be thinned, commercial services would be spread out and Alaska would be in line with many of the other hunting states.

OTHER SOLUTIONS CONSIDERED? No other solutions were considered.

PROPOSED BY: Terry Marquette EG042812566

PROPOSAL 115 - 5 AAC Chapter 85. Seasons and bag limits. Limit sheep drawing permits to 10% for nonresidents for Central/Southwest Regions as follows:

Drawing by permit only with 90% of the permits going to residents and 10% of the permits for nonresidents. The total number of permits for any one given area will not exceed harvest of 40% of the legal Rams in the hunting area.

ISSUE: I would like the boards full consideration to consider moving ALL Dall sheep hunting in Region IV to drawing permit only, limiting the number of non-resident permits to 10% or less of the total permits allowed for any specific area. The 10% allocation of this state owned resource to nonresidents should be more than adequate and provide a preference for the residents of the state that own the resource.

WHAT WILL HAPPEN IF NOTHING IS DONE? Several of the problems already exist and are getting worse. The state is not managing the resource to the fullest potential both monetarily and for trophy quality or age structure to promote better hunting and more funding available to manage. Many areas saturated with guides non-resident hunters are becoming more and more exclusive for guides to lock down access by threat and air taxes flying in the area trying to keep hunting areas they think they own private. Area conflicts are increasing with hunters and guided nonresident hunters.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, both the resource harvest will improve age structure and quality of the trophy's hunted and limit hunter conflicts. Increased management dollars to promote a healthier number of sheep and better understanding of actual sheep numbers by regular census taking.

WHO IS LIKELY TO BENEFIT? All hunter in general will benefit with less user conflicts and improved trophy quality and opportunities. Providing a quoted for both residents and non residents should allow for plenty of opportunity.

WHO IS LIKELY TO SUFFER? Better planning for all users to apply for a permit would not be considered suffering, just making an adjustment. Guides may feel they are suffering with a limited client base, because now they can do most anything they want.

OTHER SOLUTIONS CONSIDERED? Limit the amount of non resident sheep hunters to a simple 10% permit quota of the resource take-in each area based on the last 10 year harvest average to drawing permit and leaving all current harvest tag only areas still open to residents. I feel the drawing permit system needs more participation to generate additional revenue for the state to improve state wide sheep management.

PROPOSED BY: Doug Lammers EG042912570

PROPOSAL 116 - 5 AAC Chapter 85. Seasons and bag limits. Limit drawing permits to 10% for nonresidents for Central/Southwest Region Units as follows:

Nonresidents will only be granted 10% of the hunting permits offered for any big game hunting permit draw.

ISSUE: In Region IV (Central/Southwest) Units, nonresident hunters will be limited to receiving no more than 10% of the permits issued for any hunt drawing.

WHAT WILL HAPPEN IF NOTHING IS DONE? The wildlife resources of Alaska belong to the residents of Alaska first and foremost. It is only fair that the bulk of hunting draw permits go to Alaskan residents first and a smaller portion be extended to nonresidents. Extending 10% of any hunting draw coincides with the percentage extended by other States for similar hunting permit draws. Without this nonresident limitation Alaskans who desire to use this resource pay the application fee (which is non refundable) and consequently get bumped by a nonresident are being denied access to their own resource.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? This proposal secures the Alaskan resident as having first priority status for acquiring big game permits through the drawing process.

WHO IS LIKELY TO BENEFIT? The Alaskan resident will benefit from this proposal.

WHO IS LIKELY TO SUFFER? No one will suffer.

OTHER SOLUTIONS CONSIDERED? No other solutions considered.

PROPOSED BY: Terry Marquette EG042812567

PROPOSAL 117 - 5 AAC Chapter 85. Seasons and bag limits. Allocate 90% of drawing permits to residents for Central/Southwest Region hunts and exclude nonresidents in hunts with less than ten permits as follows:

A minimum of 90% of drawing permits will go to Alaska residents for all species. If a certain Unit has less than 10 permits available nonresidents are not eligible to participate in that drawing.

ISSUE: Drawing permit preference for Alaska residents – All species.

WHAT WILL HAPPEN IF NOTHING IS DONE? Alaska needs to put a cap of 10% on nonresident participation in drawing permits. This will put us in line with the other western states that have preferences for their residents which is usually 90% for drawing permits.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? An Alaskan preference for drawing permits will improve the quality of the

hunt for resident hunters and give more opportunities to our youth. This will take away a lot of the conflict with sheep, goats, and brown bear where nonresidents are forced to hire a guide.

WHO IS LIKELY TO BENEFIT? All Alaskans.

WHO IS LIKELY TO SUFFER? The commercial operators (guides) will complain on sheep, goats, and brown bears but the other western states don't force nonresidents to use a guide for any species. The guides don't support preference points for residents or a high allocation of permits going to resident hunters. The commercial operators are using a resource we all own and residents would like the Board of Game to adopt proposals that reduce conflict in the field between guides and resident hunters.

OTHER SOLUTIONS CONSIDERED? The Board of Game has been very kind to the guiding industry at the expense of the resident hunter. Nonresident tag fees bring a lot of money to the state and this helps support the Department of Fish and Game. How do other western states survive giving their residents high allocations of game? Other western states require nonresidents to apply for drawing permits (elk, deer, antelope, bear, sheep, goat, moose, cougar, etc.) six to eight months in advance of the season, they have a preference point system, and high tag fees with no guide requirements. They make money to support their programs and give their residents very (usually 90%) high allocations of game. Nonresidents can come to Alaska the day before hunting season and buy a nonresident tag over the counter the day before the season at a fraction of the price other states charge. Why doesn't Alaska manage game for residents and our Department of Fish and Game like other states? If the Board of Game doesn't start showing some preference to residents, Alaskans need to contact the governor and their representatives asking them to confirm board members who put residents as priority #1 or vote for politicians that support a preference for Alaska residents.

PROPOSED BY: Tom Lamal EG043012581

PROPOSAL 118 - 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

Develop a permit allocation formula for second degree of kindred hunters in Units 10, 13, and 14 as follows:

We suggest that nonresident drawing permit hunt success be established on a 75 and up to 25 percent basis with the up to twenty-five percent provided to second degree of kindred hunters.

ISSUE: Second degree of kindred allocation within drawing permit hunts. In many cases where nonresident hunter opportunity has been limited to drawing permit hunts and guide required species, there are very few permits available. Professional hunting guides have to maintain their business overhead and land use authorizations based on the hope that they will have clients who draw a permit. Second degree of kindred drawing permit success is growing. This factor works against a guide business owner whose clients also compete for these permits. We would like the Board of Game to develop an allocation formula that provides for second degree of kindred opportunity but also allows for a guide business owner to have knowledge that there are permits available for guided hunting opportunity.

WHAT WILL HAPPEN IF NOTHING IS DONE? Second degree of kindred drawing permit success will continue to marginalize or eliminate guide business owners and their contribution to the State.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, guided hunting provided a very important part of the rural Alaska economy. Second degree of kindred hunters have a much higher level of no-show which leaves opportunity wasted for other hunters.

WHO IS LIKELY TO BENEFIT? Professional guide business owners who need some assurance that they will have a chance for their clients to draw permits.

WHO IS LIKELY TO SUFFER? Some second degree of kindred hunters.

OTHER SOLUTIONS CONSIDERED? Status quo: does not provide for a viable business plan.

PROPOSED BY: Alaska Professional Hunters Association Inc. EG050412640

PROPOSAL 119 - 5 AAC 85.060 Hunting season and bag limit for coyote. Open coyote hunting year round in the Central/Southwest Region Units as follows:

Open coyote season year round, no bag limit in Region IV (Central/Southwest).

ISSUE: Standardize hunting regulations in regard to coyote. Make coyote hunting open year round with no closed season or bag limit.

WHAT WILL HAPPEN IF NOTHING IS DONE? Confusion over season.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, reduces predation by coyote.

WHO IS LIKELY TO BENEFIT? Sheep hunters.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Year round trapping – too many problems.

PROPOSED BY: Steve Flory, Sr. EG050912715

PROPOSAL 120 - 5 AAC 85.060 Hunting season and bag limit for coyote. Close the taking of coyotes on National Park Service lands during summer months and reduce the bag limit in the Central/Southwest Region as follows:

Amend the coyote hunting regulations for lands managed by the National Park Service as follows:

85.060

(1) Coyote

Units 9, 11, 13, 16-17 (NPS Preserves)

On lands managed by the National Park Service

10 coyotes per day [NO LIMIT] August 10 – **April 30** [MAY 25] (Resident and Nonresident)

ISSUE: Harvest of coyotes on lands managed by the National Park Service during the summer months when coyotes have adult dependent pups in the den, when adults are more susceptible to harvest due to denning activities, and pelts are not in “prime” condition, limiting their trophy value for sport hunters.

In essence, summer harvest of coyotes simply promotes opportunistic harvest by hunters, both resident and nonresident, with no tangible purpose other than population reduction. Summer harvest also creates a significant concern regarding the ethical, fair chase principles that guide responsible harvest of wildlife when the legal harvest of pups is allowed with no obvious or apparent need or use of the animal. Alaska trapping regulations for coyotes in these Units limits harvest to no later than April 30th of each year.

Liberal state hunting regulations for coyotes are often justified by the Board of Game (board) with the assumption that coyotes are negatively impacting ungulate densities in the regions where they are found and by promoting opportunistic hunting opportunity it will result in lower densities of coyotes.

The state has no scientific data to support the assumption that any ungulate populations in Alaska are being depressed due to coyote predation. State law or actions that seek to manipulate natural wildlife populations with the assumption of benefiting another species, assuming such benefit will result in higher rates of human consumption of ungulates, or have that practical effect, are inconsistent with NPS statutes, regulations, and management policies and exceed Congress’s authorization of sport hunting in ANILCA.

As with wolves, the take of coyotes during the summer months of May, June and July sanction practices that have the potential to impact the natural integrity of wildlife populations inhabiting lands managed by the NPS. The practical effect of summer harvest dates is increased efficiency for taking coyotes during a time of year when they are susceptible to harvest due to denning activities. This has the potential to create pressures on the natural abundance, behavior, distribution, and ecological integrity of this species which in turn creates unacceptable impacts to NPS preserve purposes and values.

For wolves, the NPS has determined this type of harvest opportunity is an unacceptable impact to park purposes and values and has revoked the legal harvest of wolves during May, June and July in Unit 9. (2012 Lake Clark Superintendents Compendium)

The harvest of predators during the summer denning months is clearly not an acceptable harvest authorization for sport hunting on lands managed by the NPS in Alaska and the board needs to recognize this fact.

In a letter dated February 2007, the NPS commented on a proposal to extend the coyote hunting season past April 30: “This proposal would extend the hunting season for coyote in GMU 9 from April 30 to May 25 to align with the current GMU 9 wolf hunting season. The current season offers ample opportunity to take ten coyotes per day from August 10 through April 30, and we question the need to extend the hunting season into May **when pelts are generally in less than prime condition**.... Should the Board support this proposal, we request that NPS lands be specifically excluded.”

The Board of Game ignored the NPS and adopted the proposal and included lands managed by the NPS.

In a letter to the board dated February 29, 2009, the NPS stated:

“This proposal would establish a year-round coyote hunting season with no limit on the number of animals that may be taken. **We oppose extending the hunting season into months in which whelping occurs and when pelts are generally in less than prime condition**. Should the Board support this proposal, we request that NPS lands be specifically excluded.” (emphasis added).

The board ignored the NPS and adopted regulations to extend coyote hunting season in all of the historical Region II to May 25.

In a letter dated February 18, 2011, the NPS again stated its concern: “These proposals would increase the coyote hunting limit in Region IV units from 10 coyotes per day to an unlimited number annually, have no closed season and reduce salvage requirements to the skull only. **Raising the limit to no limit could have unforeseen environmental consequences that need not be encountered**.” (emphasis added)

The board adopted an unlimited harvest limit for coyotes, ignoring NPS concerns and requests.

As defined in the current Master Memorandum of Understanding (MMOU) between the NPS and the State of Alaska, the state agreed to abide by federal law and congressional management mandates for lands managed by the NPS in Alaska.

The state mutually agreed to the following: “To recognize that the taking of fish and wildlife by hunting, trapping, or fishing on certain Service lands in Alaska is authorized in accordance with applicable State and Federal law **unless State regulations are found to be incompatible with documented Park or Preserve goals, objectives or management plans**.” (emphasis added)

WHAT WILL HAPPEN IF NOTHING IS DONE? State sport hunting regulations will continue to be inconsistent with state trapping regulations which promote pelt quality and maximum trophy or financial benefit to the trapper. The state limits trapping of coyotes statewide to no later than April 30 each year.

Promoting harvest policies that are not based on recognized scientific management principles may negatively impact harvest opportunity for federally qualified subsistence hunters, the primary purpose for consumptive take of wildlife for lands managed by the NPS in Alaska.

NPS park management purposes and values will be negatively impacted, including diminishing opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values.

The NPS may restrict harvest of coyotes during summer denning months by compendium, as they did for wolves in Unit 9, adding complexity to harvest regulations if the state is unable to provide NPS hunting restriction information in the yearly hunting regulation book. Promoting compliance with federal and state wildlife harvest regulations should be a priority.

A continued lack of cooperation on the part of the State of Alaska regarding documented Park or Preserve goals, objectives or management plans may result in the promulgation of federal regulations.

The state will be ignoring congressional intent regarding ANILCA: “(t)he standard to be met in regulating the taking of fish and wildlife and trapping is that the preeminent natural values of the park system shall be protected in perpetuity and shall not be jeopardized by human uses. These are very special lands and this standard must be set very high: the objective for park system lands must always be to maintain the health of the ecosystem and the yield of fish and wildlife for hunting and trapping must be consistent with this requirement.”

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Promoting sustainable harvest regulations consistent with recognized scientific management principles for the conservation of wildlife enhances the potential for a long term sustained harvestable surplus for sport and subsistence consumptive use which promotes the highest trophy and economic value.

WHO IS LIKELY TO BENEFIT? Sport and subsistence hunters and trappers will benefit from long term sustained harvest opportunity.

The proposed amendment protects NPS park purposes and values, including the highest management value for the nonconsumptive wildlife viewing public where naturally regulated and intact ecosystems are promoted to the maximum extent possible.

All who value ethical, humane, fair chase harvest principles for the consumptive take of wildlife on lands managed by the NPS in Alaska.

The State of Alaska will benefit from improved compliance with the intent of ANILCA.

WHO IS LIKELY TO SUFFER? Special interest groups who prefer artificial management of ecosystems within Alaska's National Preserves.

OTHER SOLUTIONS CONSIDERED? The NPS and NPCA have consistently requested that the board exempt NPS managed lands when state and federal management objectives differ. The fundamental intention of the MMOU between the NPS and State of Alaska is to define guidelines for cooperative management between the state and federal government. Unfortunately, the Board of Game has consistently refused to address NPS concerns, comments and proposals.

While hunting is an appropriate activity which NPCA supports in preserves, it must be subject to the natural ecological processes that have defined this region for a millennium. At times, there will be lower densities of wildlife in a naturally regulated system requiring limits on human harvest opportunity, especially sport trophy hunting, to minimize ecological risk and to prioritize federally qualified subsistence harvest opportunity.

This may be a necessary component for sustaining the long term integrity of ecosystems with complex, multi-dimensional relationships that were developed with minimal influence from man.

Alaska's preserves are where America puts its trust in nature!

PROPOSED BY: National Parks Conservation Association EG050912711

PROPOSAL 121 - 5 AAC 84.270. Furbearer trapping; 5 AAC 85.056. Hunting seasons and bag limits for wolf; 5 AAC 92.125. Intensive management plans. Prohibit the taking of wolves March through November in the Central/Southwest Region as follows:

Wolf take is prohibited in all Central/Southwest Region Units prior to November 1 and after March 1. That is, wolf take is prohibited between March 1 and November 1.

ISSUE: Currently, state law allows taking of wolves in some Units prior to November 1, while pups remain dependent on their parents. As well, state law in some Units allows taking of wolves after March 1, after mating has usually occurred and while females may be pregnant. The Board of Game should end this practice, as take prior to November 1 and after March 1 can result in substantially higher numbers of wolves lost to the population - pups - than are accounted for in harvest statistics. This unaccounted for loss of pups and breeding adults - which is likely very significant - causes a loss of additional recruitment to the population. As well, wolf hides are not in prime marketable condition prior to November in most areas, and thus taking wolves prior to November constitutes a waste of the resource.

WHAT WILL HAPPEN IF NOTHING IS DONE? If wolves continue to be taken prior to November 1, while pups remain dependent on parents; or after March 1, when many adult females are pregnant, wolf populations will continue to lose reproductive capacity and

recruitment, causing an overall loss of population and erosion of family structure. This is a waste of a valuable resource.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. As stated above, hides of wolves taken prior to November 1 are of lower market value, and this is a clear waste of the resource. As well, the loss of dependent pups prior to November 1, or unborn pups from females taken after March 1, constitutes a clear and unnecessary loss of recruitment to wolf populations in all Units.

WHO IS LIKELY TO BENEFIT? Wolf populations, wolf family structure and integrity, viewers of wolves, and science. As well, trappers and hunters will benefit as the proposal will result in an increase in wolf populations.

WHO IS LIKELY TO SUFFER? Few, if any. The proposal will enhance wolf populations, which would then be more available for harvest by hunters / trappers from November - March.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Rick Steiner EG043012605

PROPOSAL 122 - 5 AAC 92.015 Brown bear tag fee exemption. Reauthorize the brown bear tag fees for the Central/Southwest Region as follows:

5AAC 92.015. Brown bear tag fee exemption

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

- (1) Unit 11;
- (2) Units 13 and 16(A), that portion outside of Denali State Park;
- (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;

...

ISSUE: Brown bear tag fee exemptions must be reauthorized annually or the fee will be automatically reinstated.

General Season Hunts: The Board of Game liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16, except lands within Denali State Park, 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 achieves a greater harvest of brown bears by allowing opportunistic take and attempts to reduce brown bear numbers to reduce bear predation on moose calves. Continuation of the exemption is necessary to encourage hunters to take brown bears in these units.

The Board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities during the board meeting in March 2011. Brown bears are abundant in Unit 9 and are managed as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The 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 DLP bears.

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.

WHAT WILL HAPPEN IF NOTHING IS DONE? If the board does not reauthorize the tag fee exemption the fee will be reinstated and hunters will not be able to legally harvest a bear unless they purchase a \$25 brown bear tag. This action would likely reduce the harvest of bears in most of the affected units and in some cases redirect brown bear hunters to other units.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? In Units 11, 13, 16, and 17 where the goal of both the board and the Department is to increase the harvest of brown bears to decrease the predation on moose calves. In Unit 9 the exemption is intended to increase local acceptance of the high-density brown bear population and preserve a management strategy designed to maintain a high quality of bears being harvested.

WHO IS LIKELY TO BENEFIT? Hunters who are reluctant to purchase the \$25 brown bear tag, opportunistic hunters who encounter a brown bear while hunting other species, and residents who've expressed concerns about brown bears that are frequently observed in rural communities.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? None

PROPOSED BY: Alaska Department of Fish and Game

EG050712680

Interior Region

PROPOSAL 123 – 5 AAC 85.045(a)(9). Hunting seasons and bag limits for moose.
 Reauthorize the antlerless moose seasons in Units 19D, 20A, 20B and 20D.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		
...		
Unit 19(D), that portion in the Upper Kuskokwim Controlled Use Area		
1 antlered bull by registration permit; or	Sept. 1–Sept. 25	No open season.
1 moose by registration permit; during the period Feb. 1–Feb. 28, a season may be announced by emergency order	(To be announced)	No open season.
Unit 19(D), that portion between and including the Cheeneetnuk and Gagaryah River drainages, excluding that portion within 2 miles of the Swift River		
RESIDENT HUNTERS:		
1 antlered bull; or	Sept. 1–Sept. 20	
1 antlered bull by	Sept. 1–Sept. 25	

registration
permit; or

1 moose by registration
permit; during the
period Feb. 1–Feb.
28, a season may
be announced by
emergency order

(To be announced)

No open season.

NONRESIDENT HUNTERS:

1 bull with 50-inch
antlers or antlers
with 4 or more brow
tines on one side

Sept. 1–Sept. 20

Remainder of Unit 19(D)

1 antlered bull; or

Sept. 1–Sept. 20

No open season.

1 antlered bull
by registration
permit; or

Sept. 1–Sept. 25

No open season.

1 moose by registration
permit; during the
period Feb. 1–Feb. 28,
a season may be
announced by
emergency order

(To be announced)

No open season.

...

(18)

Unit 20(A), the
Ferry Trail
Management Area,
Wood River
Controlled Use
Area, and the
Yanert Controlled
Use Area

RESIDENT HUNTERS:

1 bull with spike-fork
antlers or 50-inch

Sept. 1 - Sept. 25
(General hunt only)

antlers or antlers
with 4 or more brow
tines on one side; or

1 antlerless moose by
drawing permit only; up
to 2,000 permits may
be issued in combination
with the remainder of
Unit 20(A); a person
may not take a cow
accompanied by a calf;
or

Aug. 15 - Nov. 15
(General hunt only)

1 antlerless moose by
registration permit only;
a person may not
take a
cow accompanied by
a calf; or

Oct. 1 - Feb. 28
(General hunt only)

1 bull by drawing permit
only; up to 1,000 permits
may be issued in
combination with the
remainder of
Unit 20(A); or

Sept. 1 - Sept. 25
(General hunt only)

1 bull by drawing
permit only; by
muzzleloader only;
up to 75 permits
may be issued in
combination with
nonresidents in
Unit 20(A)

Nov. 1 - Nov. 30
(general hunt only)

NONRESIDENT HUNTERS:

1 bull with 50-inch
antlers or antlers
with 4 or more brow
tines on one side;
or

Sept. 1 - Sept. 25

1 bull with 50-inch
antlers or antlers

Nov. 1 - Nov. 30

with 4 or more brow
tines on one side
by drawing permit
only; by muzzleloader
only; up to 75 permits
may be issued in
combination with
residents in Unit 20(A)

Remainder of Unit 20(A)

RESIDENT HUNTERS:

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. 25

1 antlerless moose by
drawing permit only;
up to 2,000 permits
may be issued in
combination with
Unit 20(A), the
Ferry Trail Management
Area, Wood River
Controlled Use Area,
and the Yanert
Controlled Use Area;
a person may not take
a cow accompanied
by a calf; or

Aug. 15 - Nov. 15
(General hunt only)

1 antlerless moose by
registration permit
only; a person may not
take a
cow accompanied by
a calf; or

Aug. 25 - Feb. 28

1 bull by drawing permit
only; up to 1,000
permits may be issued
in combination with
Unit 20(A), the
Ferry Trail

Sept. 1 - Sept. 25

Management Area,
Wood River
Controlled Use
Area, and the
Yanert Controlled
Use Area;

NONRESIDENT HUNTERS:

1 bull with 50-inch
antlers or antlers
with 4 or more brow
tines on one side;

Sept. 1 - Sept. 25

Unit 20(B), that
portion within
Creamer's Refuge

1 bull with spike-fork
or greater antlers, by bow
and arrow only; or

Sept. 1–Sept. 30
(General hunt only)
Nov. 21–Nov. 27
(General hunt only)

Sept. 1–Sept. 30
Nov. 21–Nov. 27

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
(General hunt only)

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

Dec. 1 – Jan. 31
(General hunt only)

Dec. 1 – Jan. 31

Fairbanks
Management Area

Unit 20(B), remainder
of the Fairbanks
Management Area

1 bull with spike-fork
or greater antlers, by
bow and arrow only; or

Sept. 1–Sept. 30
(General hunt only)
Nov. 21–Nov. 27
(General hunt only)

Sept. 1–Sept. 30
Nov. 21–Nov. 27

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

Sept. 1–Nov. 27
(General hunt only)

Sept. 1–Nov. 27

Unit 20(B), that portion
within the Minto
Flats Management Area

1 bull; or

Aug. 21 – Aug. 27
(Subsistence hunt
only)

No open season.

1 bull with spike-fork antlers or 50-inch
antlers or antlers with 4 or more brow
tines on one side; or

Sept. 8 – Sept. 25

No open season.

1 antlerless moose by
registration permit only;

Oct. 15–Feb. 28
(Subsistence hunt
only)

No open season.

Unit 20(B), the
drainage of the
Middle Fork of
the Chena River

1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Feb. 28 (General hunt only)	No open season.
1 bull; or	Sept. 1–Sept. 20	Sept. 1–Sept. 20
1 bull, by bow and arrow only; or	Sept. 21–Sept. 30	Sept. 21–Sept. 30
1 bull by drawing permit only; by muzzleloader only; up to 60 permits may be issued in combination with the hunt in the Salcha River drainage upstream from and including Goose Creek;	Nov. 1–Nov. 30 (General hunt only)	No open season.
Unit 20(B), that portion of the Salcha River drainage upstream from and including Goose Creek		
1 bull; or	Sept. 1–Sept. 20	Sept. 1–Sept. 20
1 bull, by bow and arrow only; or	Sept. 21–Sept. 30	Sept. 21–Sept. 30
1 bull by drawing permit only; by muzzleloader	Nov. 1–Nov. 30	No open season.

only; up to 60 permits may be issued in combination with the hunt in the Middle Fork of the Chena River;

Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway

1 bull; or

Sept. 1–Sept. 20

Sept. 5–Sept. 20

1 moose by drawing permit only; by bow and arrow or muzzleloader only; up to 100 permits may be issued

Sept. 16–Feb. 28
(General hunt only)

No open season.

Remainder of Unit 20(B)

1 bull; or

Sept. 1–Sept. 20

Sept. 5–Sept. 20

1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the Remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

No open season.

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf;

Oct. 1–Feb. 28
(General hunt only)

...

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 Youth Hunt
Management Area

RESIDENT HUNTERS:

1 bull with spike-fork or
50-inch antlers or
antlers with 4 or more
brow tines on one side;

Sept. 1–Sept. 15
(General hunt only)

or 1 bull by drawing
permit; or

Sept. 1–Sept. 15
(General hunt only)

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
(General hunt only)

1 antlerless moose by
registration permit only; a
person may not take a calf
or a cow accompanied by
a calf

Oct. 10–Nov. 25
(General hunt only)

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers
or antlers with 4
or more brow tines
on one side

Sept. 5–Sept. 15

Unit 20(D), that portion within the Bison Range Youth Hunt Management Area

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by 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
(General hunt only)

Sept.1–Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 30 permits may be issued; or

Sept. 1–Sept. 15
(General hunt only)

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

Oct. 10–Nov. 25
(General hunt only)

calf; or

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10–Nov. 25
(General hunt only)

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 30 permits may be issued

Sept. 5–Sept. 15

...

ISSUE: Antlerless moose hunting seasons must be reauthorized annually. Our 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.

Unit 19D: A February any moose hunt will be announced as needed to keep the moose population in Unit 19D, particularly within the Upper Kuskokwim Villages Moose Management Area (MMA, specified in 5 AAC 92.125 (f)(2)(A)) at healthy levels and to provide additional hunting opportunity. The decision to hold this to-be-announced season will be based on 2-year average twinning rates and other available biological information. We will establish the hunt area and harvest quota under discretionary permit authority based on the best population information available and September harvest data. Permits will be available in Unit 19D throughout the February season and a 2-day reporting requirement will be imposed so the harvest quota is not exceeded.

Unit 20A: The purpose of antlerless moose hunts in Unit 20A is to regulate population growth, to meet the Intensive Management (IM) mandate for high levels of harvest, and to provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses in Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats). Our goal is to protect the health and habitat of the moose population and to provide for a wide range of public uses and benefits. The number of moose in Unit 20A was estimated at 17,768 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.

Our objective beginning in regulatory year 2004 (RY begins 1 July and ends 30 June, e.g., RY04 = 1 July 2004 through 30 June 2005) was to reduce moose numbers to the population objective of 10,000–12,000 moose (2.0–2.5 moose/mi²) unless indicators of moose condition showed signs of improvement at higher densities. The Unit 20A population was estimated at 12,724 moose in Unit 2011. Based on harvest rates and population trends observed during RY96–RY11, continuation of these antlerless hunts is necessary to regulate the population at stable levels near this population objectives

The Unit 20A antlerless moose hunt provides additional harvest opportunity which helps to meet human consumption interests and intensive management (IM) harvest objectives. In addition, this hunt has been successful in reversing moose population growth and in increasing moose harvest and hunter participation.

Unit 20B: *Fairbanks Management Area (FMA)* — The purpose of this antlerless hunt is to provide opportunity to harvest a surplus of antlerless moose in the FMA and potentially reduce moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA are 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 declined during RY06–RY11, presumably, in-part due to the higher antlerless moose harvests of XX to XX during RY09–RY11.

Minto Flats Management Area (MFMA) — The primary purpose of this antlerless hunt is to provide a reasonable opportunity for subsistence uses.

Population estimation surveys indicate the MFMA moose density is high (>4. moose/mi²). The annual reported harvest of antlerless moose taken during RY96–RY10 was approximately 1% to 2% of the MFMA moose population and is likely sustainable.

Unit 20(B), drainage of the Middle Fork of the Chena River and the Remainder of Unit 20B — The antlerless moose harvest in this area is designed to curb growth of this population that has surpassed the upper limit of the IM population objective of 12,000–15,000 moose and helps to meet IM harvest objectives for Unit 20B. Increasing population estimates (from 12,313 in 2001 to 20,173 in 2009) and high calf:cow ratios (37–43:100 during 2003–2009) indicate numbers are increasing. Moreover, moose densities are relatively high (2.2 moose/mi²) in central Unit 20B surrounding Fairbanks.

The drawing permit hunts for antlerless moose were approved by the board in 2006 to take advantage of relatively high and increasing moose numbers in central Unit 20B. The overall Unit 20B moose population continues to grow at 4% per year, despite significant roadkill and harvest

of more than 200 cows annually (258 in 2009, 265 in 2010), representing 1.2% of the prehunt population estimate (21,105 moose). The goal is to increase the cow harvest until the growth is stopped to prevent over use of the habitat.

To mitigate hunter conflicts, we spread hunters out over space and time. Each of 16 hunt areas has permits in three time periods: one before the general hunt, one during, and one after. This way we maintain few hunters at a time in each permit area, yet expect to achieve a harvest of 400–500 cows.

Mortality from vehicle and train collisions has been high, averaging 149 moose killed annually by motor vehicles in Unit 20B. By focusing harvest in the more heavily roaded central Unit 20B, road kill may be reduced.

Finally, extensive burns in northcentral Unit 20B will provide excellent habitat in the future. With improving habitat, continued high predator harvest, and relatively mild winters, we can expect continued high productivity and survival of moose, along with increased yield.

Unit 20D: The density of moose in Unit 20D reached the IM population objective of 8,000–10,000 moose in about 2005. The highest density of moose was in southwest Unit 20D at 5.6 moose/mi² during 2006. The moose population in this area was demonstrating the effects of increased competition for food, with a moderately low level 2-year average twinning rate of 14%. Also, browse surveys indicated that moose are consuming moderately high quantities (25%) of available browse over winter. Antlerless moose hunts during 2006–2009 helped reduce the density of moose in southwest Unit 20D to 3.9 moose/mi². Continued antlerless hunts are likely needed to maintain the population at the optimal density and will contribute toward meeting the IM harvest objective of 500–700 moose. Registration permits will be issued only if additional harvest is needed in specific areas to maintain optimal moose densities.

Extensive management and research data to guide antlerless hunt decisions were collected in 2010, including calf weights, twinning rates, a population estimate, an extensive browse utilization survey, and aerial survey sightability information. These data are currently being analyzed to determine the continued need for antlerless hunts in southwest Unit 20D.

WHAT WILL HAPPEN IF NOTHING IS DONE? The moose population may increase to unacceptable levels or may need reduction when new data is available and analyzed. Opportunity to hunt a harvestable surplus of cow moose will be lost, and our ability to meet intensive management harvest objectives will 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. Delta Junction and Fairbanks residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. This reauthorization of antlerless moose hunts will likely improve or maintain the ability of moose habitat to support the current moose population. Hunting opportunity and harvest will increase and allow the department to manage these moose populations at optimum levels. The additional harvest will help in meeting intensive management harvest

objectives. It will also allow hunters to harvest moose toward meeting the intensive management harvest objective without reducing bull-to-cow ratios to low levels.

WHO IS LIKELY TO BENEFIT? Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by having moose densities compatible with their habitat.

WHO IS LIKELY TO SUFFER? Those opposed to harvest of antlerless moose.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Alaska Department of Fish and Game EG050712676

PROPOSAL 124 - 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic 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)

...

ISSUE: Resident brown bear tag fees were put in place statewide during the mid 1970s to discourage incidental harvest, elevate the status of brown and grizzly bears to trophies, and to provide revenue. Today, Region III populations are healthy, grizzly bears are highly regarded as trophies, and revenue can be generated from non-tag fee sources. The board must annually reauthorize all resident tag fee exemptions.

Eliminating resident grizzly bear tag fees throughout Interior and Eastern Arctic Alaska (Region III) simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these grizzly bear populations. This reauthorization would assist with our objective of managing Region III grizzly bear populations for hunter opportunity and would continue to allow hunters to take grizzlies opportunistically. During regulatory years 2006–2009, 35% of grizzlies harvested by resident hunters in Region III were taken incidentally to other activities (compared to 4% incidental take in regions I and II and 17% statewide).

We estimate that a kill rate of at least 6 percent, composed primarily of males, is sustainable. Human-caused mortality in most of Region III has been consistently less than 6% of the population. Where harvests are elevated (i.e. Units 20D, 20B, 20A, and portions of 26B), grizzly populations are managed through changes in seasons and bag limits. Resident tag fees that were in place prior to 2010 appeared to have no effect on harvest in these areas.

As part of this request to reauthorize exemption of grizzly tag fee throughout Region III, we recommend that the board, at a minimum, continue to reauthorize the tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

WHAT WILL HAPPEN IF NOTHING IS DONE? Harvest opportunity will be lost and hunters will be required obtain the \$25 resident tag. Subsistence users in areas where tag fees are currently exempt will be required to purchase a tag to harvest grizzly bears for food.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, will be able to opportunistically and legally harvest grizzly bears.

WHO IS LIKELY TO SUFFER? People who believe the \$25 resident tag fee is useful in managing grizzly bear populations and those who believe grizzly bears should not be harvested to provide food for subsistence hunters.

OTHER SOLUTIONS CONSIDERED? Decrease the Region III grizzly tag fee to \$10. This would require legislative action.

PROPOSED BY: Alaska Department of Fish and Game EG050712681

Note: The Board of Game deferred this proposal from the 2012 Interior Region; it was previous listed as proposal 194. At the request of the board, amended language will be forthcoming and available prior to the Central/Southwest Region meeting.

PROPOSAL 125 - 5 AAC . Hunting seasons and bag limits for caribou. Open a youth only hunt for Fortymile Caribou.

Unit 20, August 10th - 15th. Fortymile Caribou Herd youth hunt.
One bull caribou open to Alaska residents 16 years and younger with the completion of the hunter education class.

ISSUE: I would like to see the Board of Game adopt a change to the Fortymile Caribou Herd. While I understood the need to make it a bull only hunt and make the open date later in the season (August 29th) we have lost an opportunity for the children in our state with the starting of school in much of the state earlier than the Aug 29th hunt opening. I would like to propose an August 10 thru August 15 opening for any bull caribou for residents of the state 16 years old and under with the completion of the hunter safety course. A five day hunt in which the harvested number of animals would be counted toward the seasonal quota established by the board.

WHAT WILL HAPPEN IF NOTHING IS DONE? We have lost a great big game hunting opportunity for our children.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED? Both. Still maintaining close control on the number of

animals taken to preserve and reestablish the herd and improving the quality of our children's concept of Alaska's natural resources and what we must do to protect them.

WHO IS LIKELY TO BENEFIT? The children of this great state. One of our most valuable resources.

WHO IS LIKELY TO SUFFER? Some adults that regularly hunt the Fortymile Herd may be affected by the number of animals taken during the youth hunt that will apply to the seasonal allowable harvest quota.

OTHER SOLUTIONS CONSIDERED: Making it a youth hunt with a set number of tags to be applied for during the draw. I thought that it may be rejected because of the increased clerical work load. And as most of us realize as we get older, it's about getting out and participating in the hunt. The kill is not the most important thing. A great lesson for kids.

PROPOSED BY: Larry DeBoard

EG042511317

Statewide

PROPOSAL 126 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions. This regulation would prohibit some pack animals from being used for big game hunting.

5 AAC 92.085. The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080.

(x) the aid or use of domestic goats (*Capra spp.*) and sheep (*Ovis spp.*) as pack animals is prohibited in sheep, goat, or muskox hunting.

ISSUE: Disease, primarily pneumonia, has caused major die off events in wild sheep populations in the lower 48 states. Once such a die off occurs, disease persists in the surviving animals and in many cases, the population is not able to recover. To date, Alaska has not documented such a large scale, pneumonia caused, die-off. Studies conducted at Washington State University and by the Idaho Game and Fish Department have demonstrated an empirical link between wild sheep contact with domestic sheep and these disease events.

Alaska's wild sheep and goat populations are at risk as we have large populations dispersed across large expanses of contiguous habitat. Once introduced, disease could easily be transmitted across long distances as animals move through their ranges and congregate. Further, Alaska animals are immunologically naive, as they have no prior exposure to these pathogens and the result of exposure to these diseases could be severe. Most populations of muskox in Alaska are in a state of population decline for unknown reasons. These animals are particularly sensitive to disease introductions, having the lowest genetic diversity from multiple population bottlenecks.

WHAT WILL HAPPEN IF NOTHING IS DONE? If a regulation is not adopted the risk of disease transmission to Alaska's wild ungulate populations will remain and may increase if the use of domestic goats and sheep as pack animals increased in the future. If disease transmission occurs the economic and conservation impacts could be large.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED? If this regulation is adopted, it could prevent die-offs that could reduce sheep, goat, or muskox populations.

WHO IS LIKELY TO BENEFIT? Sheep, goat and muskox hunters, wildlife viewers, and wildlife enthusiasts that harvest and enjoy these resources.

WHO IS LIKELY TO SUFFER? Pack stock operators/hunters who choose to use domestic goats or sheep as pack animals.

OTHER SOLUTIONS CONSIDERED: We considered restrictions of other domestic pack animals that may pose lesser risks of disease transmission to wildlife. Also, although the transmission of respiratory disease from pack goats and sheep to Dall sheep, mountain goat and muskox can only be prevented with absolute certainty through prevention of any contact, herd health programs may be feasible to reduce and manage the risks for use in some circumstances.

PROPOSED BY: Alaska Department of Fish and Game at the request of the Board of Game

EG050412658
