

**PRELIMINARY
RECOMMENDATIONS
BOARD OF GAME PROPOSALS**

March 2011-Region IV

Alaska Department of Fish & Game

Division of Wildlife Conservation

The department's recommendations are based on analysis of the proposals with available information. These recommendations may change after further analysis based on public comment or additional information.

PROPOSAL 1

EFFECT OF THE PROPOSAL: This proposal lengthens the lynx trapping season in Unit 9B by one month.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: This proposal brings the lynx trapping season in Unit 9B in line with adjacent Unit 17. Lynx are not of conservation concern in 9B. Harvest has been relatively light over the past three decades and 2008-09 Trapper Survey respondents reported lynx are common in the unit. The information available suggests Unit 9B can sustain an increased lynx harvest.

PROPOSAL 2

EFFECT OF THE PROPOSAL: This proposal lengthens the wolverine trapping season in Unit 9B by one month.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 3.

PROPOSAL 3

EFFECT OF THE PROPOSAL: This proposal lengthens the wolverine trapping season in Unit 9B by one month.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: This proposal brings the wolverine trapping season in Unit 9B in line with adjacent Unit 17. Wolverines are not of conservation concern in 9B. Harvest has been relatively light over the past three decades and male harvest has been consistently higher than female harvest. In addition, 2008-09 Trapper Survey respondents reported wolverine to be common throughout Unit 9. The information available suggests Unit 9B can sustain an increased wolverine harvest.

PROPOSAL 4

EFFECT OF THE PROPOSAL: The proposal liberalizes the brown bear bag limit in Unit 9.

Current Bag Limit: 1 bear every 4 years
Proposed Bag Limit: 1 bear every 2 years

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The intent of this proposal is to reduce the brown bear population to increase calf survival and reduce bear-human conflicts. However, changing the brown bear bag limit is not

expected to reduce the bear population or bear predation on calves. Brown bear seasons and bag limits in Proposal 114 are expected to have more effective in reducing bear-human conflicts.

If adopted the liberalized bag limit is not expected to increase harvests. Few hunters take more than 1 brown bear during their life. The level of interest in bear hunting and costs of a hunt impose greater limitations on the number of bears that an individual will shoot than the current bag limit does. Bear harvests in most areas of Unit 9 are limited by transporter availability, the guiding industry, and limitations imposed by government agencies on commercial services. As a result few additional bears are likely to be taken if this proposal is adopted. If any additional harvest does occur, it is more likely to occur near communities by people who live or work in Unit 9.

PROPOSAL 5

EFFECT OF THE PROPOSAL: Shifts the season dates of the fall and spring brown bear hunt and extend the fall season in Unit 9E.

Current Season Dates: October 1 to October 21(odd years) and May 10 to May 25 (even years)
Proposed Season Dates: September 6 to October 15 (odd years) and May 15 to May 30 (even years)

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The issue statement of this proposal suggests that the intent of the proposal is to simply shift the bear season dates in the fall 5 to 10 days earlier, not extending the fall season as indicated by the proposed season dates. The season change is intended to address concerns for bear predation on ungulates in Unit 9E, as well as the concern for human safety. The proposed change is not expected to alleviate the issues addressed in the proposal and it will misalign brown bear hunting seasons in Unit 9.

Brown bears in Unit 9 are a highly sought because of their reputation for trophy sized bears. Harvests from Unit 9E has averaged 173 bears annually since 2000, an exploitation rate of approximately 6%. At this rate of harvest seasons and bag limits should not be liberalized unless the intent is to move away from trophy bear management in Unit 9.

Altering the season dates will likely result in an increased harvest. Sows and small bears will be more active during the proposed seasons and may make up a larger portion of the harvest even though most hunters will continue to hunt for large bears. Despite the increased take it is unlikely that the resulting harvest will reduce bear predation on moose or caribou.

PROPOSAL 6

EFFECT OF THE PROPOSAL: Liberalize the resident brown bear bag limit in Units 9A, 9B, 9C, and 9E.

Current Bag Limit: 1 bear every 4 years
Proposed Bag Limit: 1 bear every year

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendation for Proposal 4.

PROPOSAL 7

EFFECT OF THE PROPOSAL: Liberalize the brown bear bag limit for residents in Unit 9E

Current Bag Limit 1 bear every 4 years
Proposed Bag Limit: 1 bear every year

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 4.

PROPOSAL 8

EFFECT OF THE PROPOSAL: Establish a resident only registration hunt for the Southern Alaska Peninsula Caribou Herd in Unit 9D

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The Southern Alaska Peninsula Caribou Herd is recovering from a recent population low due to recent management actions to reduce wolf predation on caribou calves. However the population size and bull:cow ratio are still below the thresholds for reinstating harvests. ..

PROPOSAL 9

EFFECT OF THE PROPOSAL: Change the caribou hunting season in Unit 9B to August 15 through March 31.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 10.

PROPOSAL 10

EFFECT OF THE PROPOSAL: Change the caribou hunting season in Unit 9B to August 1 through March 31.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: In an effort to more effectively manage the Mulchatna Caribou Herd, hunting seasons were made uniform throughout the range of the herd. As the herd declined, restrictions on both seasons and bag limits were implemented. The present hunting season for Mulchatna

caribou, including federal lands, is August 1 through March 15. The department believes that the existing season provides opportunity for residents to harvest a caribou without overharvesting the herd and preventing its recovery.

PROPOSAL 11

EFFECT OF THE PROPOSAL: Change the caribou hunting season in Unit 9B to August 1 through March 31.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 10.

PROPOSAL 12

EFFECT OF THE PROPOSAL: Establish a registration permit for resident moose hunts in Unit 9B.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 14.

PROPOSAL 13

EFFECT OF THE PROPOSAL: Establish a registration permit for resident moose hunts in Unit 9E.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 14.

PROPOSAL 14

EFFECT OF THE PROPOSAL: Establish a registration moose hunt in Unit 9.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: This proposal is the product of a moose working group that was formed to address conflicts between moose hunters in Unit 9. The primary goal of this proposal is to increase reporting rates, inform hunters of land ownership patterns, and increase the exchange of information related to moose biology and management between the Department and moose hunters.

A key facet of the solutions discussed by the workgroup was permit conditions designed to reduce conflicts between local and nonlocal hunters. During the past 10 years, proposals to close federal lands to nonlocal moose hunters have been submitted to the Federal Subsistence Board. The Federal Board has deferred action on federal proposals to offer the workgroup and State an

opportunity to address user conflicts through the State’s regulatory system. To achieve this, the Board may want to consider various options with stakeholders during the Board meeting.

PROPOSAL 15

EFFECT OF THE PROPOSAL: Limit the harvest of moose in Unit 9 by applying bag limit restrictions to both state and federal hunts.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Current regulations stipulate a single cumulative bag limit for all hunting in Alaska. A hunter cannot harvest additional moose under State hunting regulations if the hunter has already filled their bag limit under Federal hunting regulations and vice versa. No action is needed due to existing regulations.

PROPOSAL 16

EFFECT OF THE PROPOSAL: Establish a registration hunt for resident moose hunters in Unit 9 and close the nonresident moose hunting season.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue. Moose populations are sufficient to support existing harvest levels in Unit 9, despite concerns expressed by some hunters, and harvest is generally spread out over a large area. Much of the area is difficult access without an airplane and the availability of airplanes greatly limits access for some users. Closing the nonresident moose hunting season is not expected to increase moose harvest opportunity for resident hunters. Establishing a registration moose hunt for residents has been suggested by several proposals and merits further consideration by the Board.

PROPOSAL 17

EFFECT OF THE PROPOSAL: Extend the fall moose hunting season 5 days in Units 9C and 9E

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Department proposal. See issue statement for rationale.

PROPOSAL 18

EFFECT OF THE PROPOSAL: Align the moose hunting season south of the Naknek River in Unit 9E with the moose hunting season in Unit 9C

DEPARTMENT RECOMMENDATION: **No Recommendation (No Biological Issues)**

RATIONALE: The intent of this proposal is to align the moose hunting season in a small portion of Unit 9E near the village of South Naknek with the moose hunting season in Unit 9C. While this would make moose hunting seasons more consistent for local residents who live on the Naknek River, the area affected would be difficult to describe in regulation and would be difficult to discern in the field. No prominent geographic features to define the affected area have been proposed to make this change practical.

PROPOSAL 19

EFFECT OF THE PROPOSAL: Modify the amount reasonably necessary for subsistence (ANS) for wolves in Unit 9.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The board has made a positive customary and traditional use finding (a “C&T” finding) for wolves in Unit 9 under 5 AAC 99.025(11), but no ANS is specified. There is also a positive C&T finding for wolves in 5 AAC 99.025 (13) (furbearers and fur animals), and the ANS is identified as the “harvestable portion”. Wolves occur throughout Unit 9 and no biological concerns have been identified. The wolf management objective—to maintain a population that can sustain a harvest of 50 wolves—is being met and has not been affected by the intensive management plans adopted for Unit 9.

PROPOSAL 20

EFFECT OF THE PROPOSAL: Modify the amount reasonably necessary for subsistence (ANS) for wolves in Unit 10.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: There is a positive C&T for wolves in 5 AAC 99.025 (13) (furbearers and fur animals) and the ANS is identified as the “harvestable portion”. Radio collar data suggests that wolves are able to disperse from mainland populations in Unit 9 to Unimak Island in Unit 10. No biological concerns have been identified for wolves in Unit 10 and proposed management actions are not expected to alter this status.

PROPOSAL 21

EFFECT OF THE PROPOSAL: Implement a predator control plan for wolves and bears in Unit 9B

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The status of the moose population in Unit 9B is not well known. Surveys conducted by the National Park Service suggest a possible decline in Lake Clark National Park and Preserve and that the population may have declined below intensive management objectives. However, factors contributing to the decline are not fully understood. Habitat limitations, illegal harvest of cows, and poor calf recruitment have been identified as possible causes. The

Department recommends that this proposal not be adopted until the status of the moose population has been confirmed and a feasibility study has been conducted.

PROPOSAL 22

EFFECT OF THE PROPOSAL: Implement the intensive management plan for Unit 9E.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: An intensive management plan was adopted for Units 9C and 9E to reduce wolf predation on the Northern Alaska Peninsula Caribou Herd, but the plan has not been implemented because of restrictions imposed by federal land managers. Since 2006, 60% of the caribou calving has occurred on federal lands, and access to these lands is needed if the program is to be successfully implemented.

PROPOSAL 23

EFFECT OF THE PROPOSAL: Extend the wolf hunting and trapping seasons on Unimak Island in Unit 10 and modify the boundaries of the predator control area.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Department Proposal. See issue statement for justification.

PROPOSAL 24

EFFECT OF THE PROPOSAL: Delete requirement for black bear harvest tickets in Game Management Unit 17.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Department proposal - see Issue Statement

PROPOSAL 25

EFFECT OF THE PROPOSAL: Increase the bag limit to two brown bears per regulatory year in Game Management Unit 17

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 29. The Nushagak Advisory Committee supported the concept of this proposal but was in favor of Proposal 29 because it better represented the changes proposed by proposals 25, 27, and 28.

PROPOSAL 26

EFFECT OF THE PROPOSAL: Change the current Sept 1 – May 25 brown bear season with a bag limit of one bear per year for nonresidents in Unit 17 to one bear every four years, Oct 1-Oct 21 (odd years only), and May 10 – May 25 (even years only)

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Congressional recognition of the authority of the States to manage fish and wildlife on Federally administered lands, including those by the National park Service, is very evident through legislation in ANILCA Sections 203, 1313 and 1314 and CFR part 24, Department of the Interior Fish and Wildlife Policy: State and Federal Relationships. The Statute and Policy are implemented through the Master Memorandum of Understanding between the Alaska Department of Fish and Game and the US National Park Service (MMOU). The MMOU notes that:

“The taking of fish and wildlife by hunting, fishing and trapping 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.”

The implementation of management practices, adopted under state management plans that assure sustainability of populations, are not incompatible with documented Park or Preserve goals, objectives or management plans.

Most of the statistics and/or harvest numbers quoted in this proposal are incorrect. Brown bear numbers in Unit 17B are healthy, and have likely increased during the last 10 years. Sealing records indicate that between 2000 and 2009 a maximum of eight brown bears have been reported taken in the Lake Clark National Preserve portion of Game Management Unit 17. Past changes in the Unit 17 brown bear hunting season and bag limits have not affected the population size of brown bears in the Lake Clark National Park and Preserve portion of Unit 17B.

PROPOSAL 27

EFFECT OF THE PROPOSAL: Create a brown bear predator control permit program in Unit 17B.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Brown bear numbers in Unit 17B are healthy and have likely increased during the last 10 years. Bears are a predator on moose in this area but the Department does not know the extent to which that predation might be influencing the Unit 17B moose population. The recommendation remains consistent with past Department recommendations to oppose predator control programs in areas where the Department has not assessed the influence of predation on ungulate populations.

PROPOSAL 28

EFFECT OF THE PROPOSAL: Change the brown bear bag limit and other hunt conditions in Game Management Unit 17.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 29

PROPOSAL 29

EFFECT OF THE PROPOSAL: Eliminate the DLP (defense of life and property) salvage requirements for brown bears in Unit 17; change hunting season to August 20 - May 30, with a bag limit of 2 bears per regulatory year.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Brown bear numbers in Unit 17 are healthy and have likely increased during the last 10 years. The Department has received comments from hunters who wish to take more than one brown bear per regulatory year. Brown bear numbers in Unit 17 are judged sufficient to provide for this additional opportunity. Changing the bag limit is not expected to greatly increase bear harvests or reduce bear predation on moose (Proposal 28). The defense of life and property aspects of this proposal probably can't be addressed at this time, but a discussion about salvage during the summer in rural areas would be beneficial.

The Department recommends amending the proposal to include the 2 bear bag limit, an August 20- May 31 season, and eliminate the tag and tag fee requirement as requested in proposal 28.

PROPOSAL 30

EFFECT OF THE PROPOSAL: Change resident caribou hunting season in Unit 17 to August 1 through April 15, with a bag limit of two for the entire year.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: During March 2007, the board adopted uniform regulations for the Mulchatna Caribou Herd and applied them across its range in GMUs 9, 17, 18, and 19. The Board provided resident hunters with a reasonable opportunity for subsistence uses and addressed the ANS (amount reasonably necessary for subsistence uses) for the MCH. In March of 2009, the Board again considered changes relative to Mulchatna caribou at the regularly scheduled Region II Board meeting in Anchorage and excluded non-residents from hunting caribou from within the range of this herd.

The Department believes that the existing season (August 1 - March 15) provides reasonable opportunity for residents interested in harvesting a caribou. Adoption of this proposal would create different hunting regulations for different portions of the herd's range and would open a

general caribou hunt on the Nushagak Peninsula (parts of Unit 17A and 17C) where it is not now open.

PROPOSAL 31

EFFECT OF THE PROPOSAL: Establish a nonresident drawing hunt for caribou in Unit 17.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Adoption of this proposal would delay or preclude herd growth and achieving bull:cow ratio and harvest objectives. The harvestable surplus for the Mulchatna herd is fully allocated. At this time, no additional harvest should be adopted without reducing harvest elsewhere.

PROPOSAL 32

EFFECT OF THE PROPOSAL: Establish a nonresident registration hunt for caribou in Unit 17.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Adoption of this proposal would delay or preclude herd growth and achievement of bull:cow ratio objectives and harvest objectives. The harvestable surplus for the Mulchatna herd is fully allocated. No additional opportunity should be adopted without reducing harvest elsewhere. The ANS for Mulchatna caribou is 2,100–2,400 across a number of units and subunits. The reported harvest for 2009 is 309 caribou, well below the ANS.

PROPOSAL 33

EFFECT OF THE PROPOSAL: Change the deadline for nonresidents to apply for registration hunts in Unit 17.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The present deadline for issuing RM587 permits is not a regulation; it is a permit condition directed by the BOG. This registration hunt was established by the Board during the March 2005 meeting, with permit conditions resulting from a working group recommendation, including limiting the number of permits to 75 and issuing through the last working day in August. During the Spring 2009 BOG meeting, the Board directed the Department to amend those hunt conditions, liberalizing permit distribution. The Board specified that permits would be issued up through the first day of the nonresident moose hunting season (Sept 5th), further specifying that permits would not be issued on weekends or state holidays.

PROPOSAL 34

EFFECT OF THE PROPOSAL: Establish a nonresident registration hunt for moose in Unit 17A within the Togiak National Wildlife Refuge.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The moose population is growing and can sustain additional harvest. However, the continuing objective is to increase the population and allow it to expand into neighboring areas. The population is expanding, especially to the west.

The Board has followed the recommendations provided by a planning effort consisting of the Department, the Nushagak and Togiak AC's, Togiak NWR, and the Bristol Bay RAC. Although that plan has never been finalized, the group recommends excluding non-residents until the population exceeds 1700 moose. The population is currently approaching 1400 moose.

The plan specifies that hunting could commence when the newly colonizing population exceeded 300 moose; that a winter hunt be instituted at 600 moose; and that aircraft access be allowed at 1100 moose. The state and federal regulatory boards have enacted those recommendations when those triggers were reached

PROPOSAL 35

EFFECT OF THE PROPOSAL: Change the area of the nonresident registration hunt for moose in Unit 17B to a general hunt.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The Department makes no recommendation because this is an allocation issue. Non-resident harvest has declined substantially since the registration hunt was established. It is difficult to project the increase in non-resident hunting or magnitude of user conflicts under a general season. . If adopted, this proposal may result in a reduction or restriction to subsistence opportunity, such that the board should address whether the proposed regulation still provides a reasonable opportunity for subsistence.

PROPOSAL 36

EFFECT OF THE PROPOSAL: Close nonresident moose hunting in Unit 17B for 5 years.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue. The moose population can sustain the current harvest. The non-resident harvest is low and declining.

PROPOSAL 37

EFFECT OF THE PROPOSAL: Change where and when Units 17B and 17C registration moose hunt permits are available.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The present place and times where Units 17B and 17C moose hunt permits are available is not a regulation, but is a permit condition directed by the BOG to reduce user conflicts and provide reasonable opportunity for subsistence.

The population could not sustain the harvest levels that would result from a hunt with unlimited distribution of permits. Harvest levels would have to be limited by some other method. Because of the remote area, timely reporting and difficulty notifying a hunt closure preclude closing the hunt by EO.

PROPOSAL 38

EFFECT OF THE PROPOSAL: Allow use of radio communication for taking wolves in Unit 17.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Present state statute prohibits assisting someone in taking a free-ranging wolf the same day as a person has been airborne. As written, the proposal may also conflict with the federal airborne hunting act if the wolf is taken while a person who was assisting is still in the air.

PROPOSAL 39

EFFECT OF PROPOSAL: Modify the bag limit for ptarmigan in Unit 13B to be the same as for the rest of Unit 13; bag limit of 10 per day, 20 in possession and season dates of 10 August – 31 March.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: In 2005 the department proposed reducing the bag limit for ptarmigan in Unit 13 during winter months to help ptarmigan numbers recover. The Board amended the proposal, and reduced the late winter bag limit to 5 per day in subunits 13A, 13B, and 13E. In 2009, due to reports of increasing ptarmigan numbers in subunits 13A and 13E, ADF&G proposed returning those subunits to the standard season and bag limit. The Board adopted the proposal. Breeding bird counts in subunit 13B however, still show low ptarmigan numbers. While willow ptarmigan appear stable, very few or no rock ptarmigan have been heard during bird counts in recent years. There are several potential causes for the low ptarmigan numbers including a series of cold and wet springs, a high number of birds-of-prey due to the current exceptional snowshoe hare high, and increased winter hunting effort.

Fall ptarmigan harvests are considered compensatory; meaning many of those ptarmigan may have died during winter months had they not been harvested. Spring harvests however are considered additive. Areas in southcentral Alaska with extensive winter harvest such as Hatcher Pass and the Caribou Hills have had similar declines as subunit 13B, while non-hunted areas such as Chugach State Park have not.

Regardless of why ptarmigan are down, continuing with a winter closure will help this population recover faster than if the general season was re-instated at this time. Snowshoe hare numbers will be considerably lower in two years, as will the numbers of lynx and birds-of-prey. Expectations are that ptarmigan numbers will be increasing at that point; harvest opportunities should be increased concurrently.

PROPOSAL 40

EFFECT OF PROPOSAL: The current year-round brown bear season, with a bag limit of 1 bear per regulatory year in Unit 13 would be restricted to 1 Sept. – 31 May, and nonresidents would be restricted to 1 bear every four regulatory years.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The land status in Unit 13 is dominated by state, Bureau of Land Management public land, and private corporation land. Very little federal preserve land falls within the unit. Additionally, federal park lands within the unit are managed under federal subsistence regulations and thus, state bear regulations are not applicable.

In regard to the recent increases observed in the moose population in Unit 13, it must be noted that the intensive wolf management program has been the primary driver behind the improvement in moose numbers and hunting opportunity.. This program was recently reauthorized for the sole purpose of continuing progress towards unitwide moose population and harvest objectives set in state codified regulations.

In reference to the Unit 13 brown bear hunting regulations, seasons and bag limits have slowly been liberalized since the early 1960s in an attempt to provide additional brown bear hunting opportunity and to help reduce the number of bears for the benefit of moose. While the effect on moose is still unclear, the liberalized regulations have certainly increased bear hunting opportunities.

Due to concerns of overharvest, Unit 13 has had a tremendous amount of brown bear research over the years focused on the effects of hunting. Studies from the mid-1980s suggested a sustainable harvest rate of 5-7% for all bears or 8% for bears > 2 years of age. These rates would give a maximum unitwide sustainable harvest of less than 90 bears per year given a population of 1500 bears (long-term population estimate for Unit 13). Current research and modeling have clearly shown that the Unit 13 brown bear population can sustain much higher harvests than previously thought. Since 2000, 138 bears have been taken per year, with the highest recorded harvest of 158 occurring most recently in 2008-09.

Research from an ongoing brown bear project in the Nelchina Basin in subunit 13A, the most heavily accessed and hunted portion of the unit, has shown a healthy and robust population. It appears that a source-sink dynamic within the Unit 13 brown bear population may be much more localized than previously thought; meaning bears are not moving long distances to fill-in low density areas. Additionally, just given the number of bears captured throughout this project (127

bears in 8% of the unit), there is a growing body of evidence the brown bear population in Unit 13 has been stable in recent years.

The current brown bear regulations in Unit 13 and the associated brown bear research are helping biologists statewide understand what the true effects of liberalized seasons are. By continuing the current management strategy in Unit 13 we will continue to enhance our knowledge of brown bear population dynamics, and will have a more solid basis for managing brown bears statewide in coming years.

PROPOSAL 41

EFFECT OF PROPOSAL: Allow the take of brown bears over registered black bear bait stations in a limited area (Unit 13D), and only over existing bait stations (registered for the past three consecutive years).

DEPARTMENT RECOMMENDATION: **No Recommendation (No biological concerns)**

RATIONALE: This proposal suggests a set of guidelines by which brown bears could be harvested over bait. Registered black bear bait station permittees and their relatives within second-degree of kindred would be allowed to take brown bears over these bait stations. Hunters would have to abide by all current brown bear regulations, including the 1 bear per year bag limit. Hunters would be required to report their take within 5 days. The department could emergency close the taking of brown bears over bait if problems become evident.

Black and brown bears coexist in this area at relatively high densities due to the availability of salmon throughout the summer months. This is in contrast to the majority of Unit 13 which has very few salmon or black bears. Subunit 13E near the mid-Susitna River is however similar to 13D.

The vegetation in subunit 13D is thick, and the prevalence of bark beetle killed spruce trees, many laying on the ground, creates a very difficult scenario for hunting bears. There are some open hillside hunting opportunities, but the vast majority of black bear hunters in this area rely on bait stations. The bait stations are concentrated along the Richardson Highway and more recently along the Klutina Lake road as well; other portions of the subunit are difficult to access. Very few brown bears are harvested in this area due to the thick timber, and no biological concerns have been identified for brown bears in this area.

If adopted we recommend amending the proposal so that brown bears may be taken in this manner only under a registration brown bear permit, strictly for tracking purposes.

PROPOSAL 42

EFFECT OF PROPOSAL: Repeal the exclusionary language of caribou harvest for Tier I caribou in Unit 13 (assuming this refers to the restriction of not allowing the take of moose or caribou outside Unit 13); create a non-subsistence area for the center of subunit 13A; and create fall and winter drawing hunts within the non-subsistence area.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: There is general recognition that the number of hunters interested in harvesting Nelchina caribou greatly exceeds the allowable surplus each year. The current exclusionary language of the Tier I hunt recognizes different hunt patterns. Some hunters hunt in one area for everything, while other hunters have the ability to travel to different areas for different hunting opportunities. This exclusionary language was adopted to allow hunters to choose which hunting pattern fits them the best, which in-turn reduces the pool of hunters interested in hunting Nelchina caribou. This option was adopted as a self-regulating hunt criterion. The objective was to identify a pool of subsistence users that was small enough to have a manageable registration style hunt that would not be possible otherwise. There are other options also utilized to help reach this goal, including the 1 permit / household.

The current regulation does allow for drawing hunt opportunities in addition to the Tier I hunt which provide more options for resident hunters. While there is no one solution that will work for all hunters, the current scenario is a compromise, most importantly allowing hunters to make a choice they otherwise would not have.

The creation of a non-subsistence area must be addressed by the Joint Boards.

PROPOSAL 43

EFFECT OF PROPOSAL: This proposal removes the hunting restriction for Tier I caribou in Unit 13 (assuming this refers to the requirement of not allowing the take of moose or caribou outside Unit 13).

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue. There is general recognition that the number of hunters interested in harvesting Nelchina caribou greatly exceeds the allowable surplus each year. The current exclusionary language of the Tier I hunt recognizes different hunt patterns. Some hunters hunt in one area for everything, while other hunters have the ability to travel to different areas for different hunting opportunities. This exclusionary language was adopted to allow hunters to choose which hunting pattern fits them the best, which in-turn reduces the pool of hunters interested in hunting Nelchina caribou. This option was adopted as a self-regulating hunt criterion. The objective was to identify a pool of subsistence users that was small enough to have a manageable registration style hunt that would not be possible otherwise. There are other options also utilized to help reach this goal, including the 1 permit / household criteria.

The current regulation does allow for drawing hunt opportunities in addition to the Tier I hunt which provide more options for resident hunters. While there is no one solution that will work for all hunters, the current scenario is a compromise, most importantly allowing hunters to make a choice they otherwise would not have.

In reference to moose hunting opportunities, there has always been tremendous pressure on moose in Unit 13 because of the existence of the Nelchina caribou herd. Caribou hunters often wait until the general moose season opens specifically to maximize their chances of taking game while in the field. While this Tier I restriction may increase the number of Unit 13 moose hunters, the moose hunting regulations are designed to withstand additional pressure. Approximately 4,400 hunters reported moose hunting in Unit 13 in 2009. This is still below the peak number of 6,000 that reported moose hunting in the mid-1990s. If the moose hunter numbers increase unsustainably, we will recommend changes to the Board of Game at that time.

PROPOSAL 44

EFFECT OF PROPOSAL: A portion of Unit 13 would be made a non-subsistence area with an allocated portion (recommended 35%) of the Nelchina caribou harvest going to a drawing hunt.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: The creation of a nonsubsistence area must be addressed by the Joint Boards of Fisheries and Game.

PROPOSAL 45

EFFECT OF PROPOSAL: This proposal would repeal the exclusionary language of caribou harvest for Tier I hunting for caribou in Unit 13, allocate a percentage of the caribou harvest to a resident only drawing hunt (recommended 40%), create a non-subsistence area or zone in Unit 13, and replace the Paxson Closed Area with an archery-only area for all game species, and allow caribou to be harvested in the former closed area under an archery only drawing hunt.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: The creation of a non-subsistence area must be addressed by the Joint Boards of Fisheries and Game.

PROPOSAL 46

EFFECT OF PROPOSAL: This proposal would allocate a set number of permits to the Nelchina caribou Tier I hunt based on the harvestable surplus in comparison to the ANS which is 600-1000, and allocate the remainder of the permits to the drawing hunts.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: Prior to setting allocations for each of the Nelchina caribou hunts, there are a number of complications and general considerations that must be addressed. Annual changes in the allowable surplus are inevitable. For example, the total annual allowable harvest (largely reflective of the available surplus) for the Nelchina caribou herd since 2000 has ranged 788 to 3090.

Given the inherent difficulty in determining an accurate allowable Nelchina caribou surplus each year, it is not always clear if the projected surplus will be above or below 1000 (high end of the ANS) in any given year until just before the hunts begin due to census and composition survey flights. The preliminary harvest surplus numbers during the application period in the prior November/December are subject to change due to overwinter mortality and calf production the following spring. Additionally, the federal subsistence hunts generally take between 200 and 600 caribou through the fall and winter seasons.

If percentage allocations are considered, they would only apply to the allowable surplus minus the expected federal take, unless the Federal Board agreed to limit the federal hunt take.

Per percentage allocations for state hunts, the established ‘up-to’ 300 allowable caribou for the community hunt would not be compatible with fluctuating herd numbers (10% of 3000, but 30% of 1000). Likewise, adding ‘up-to’ language for the Tier I registration hunt could potentially hamper herd management. For example, if it is set at 700 (to fulfill the remaining ANS), the hunt could be closed very quickly given too many Tier I permits. It could also cause a biological problem if the number of cows required to be taken for herd management is not met. In some years there may need to be as many as 1000 cows harvested. This cannot be accomplished if the Tier I and community hunts can take no more than 1000 total caribou (currently the drawing hunts are bull only). For conservation reasons, the Tier I hunt could have ‘up-to’ language if additional cows were also allowed to be taken if necessary, or the Tier I bag limit could be limited to cows only.

If allocation percentages are considered for the state Nelchina caribou hunts, the Board may desire to eliminate the ‘up-to’ language for the community hunt.

PROPOSAL 47

EFFECT OF PROPOSAL: This proposal would replace the current Nelchina caribou hunting regulations (subsistence harvest hunt, Tier I registration, and drawing hunts) with just a Tier I and a drawing hunt.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The proposal suggests eliminating the Nelchina caribou community hunt, and recommends a single Tier I hunt that would be one caribou per year, one permit per household, either sex bag limit, moose and caribou hunting restricted to Unit 13, season dates 10 Aug – 20 Sept and 21 Oct – 31 March. The Tier I permit number would be set at 2000 every year (double the current upper ANS range). The proposal also recommends a drawing hunt that would be one permit per year, bull only bag limit, season dates 10 Aug – 20 Sept and 21 Oct – 31 March. Permits for both hunts would be issued based on a bonus point system (in the random draw once the first year, twice the second year, and so forth).

A bonus point system was in-place for Tier I subsistence caribou permits in 2009-10 and again in 2010-11 (under special consideration by the court). In those hunts, it was explicitly stated in regulation that each household could not receive more than one permit per four regulatory years,

however the modeled prediction given the bonus system was that households could expect to receive a permit roughly every four years. On 12 July 2010, the Honorable Judge Bauman ruled that one caribou every four years was not adequate to meet subsistence needs, at least according to the public record (pg 29, Decision on Summary Judgment, Case No. 3KN-09-178CI). That language has since been removed from regulation by the Board of Game, and households are now eligible to receive one Tier I permit per year.

Additionally, bonus point or preference point systems may or may not result in the desired outcome, suggested by the author, for distributing hunting opportunity. The effectiveness of bonus point systems depends on the structure of the system and the equation used to preference previously unsuccessful hunters and both bonus point and preference point systems become ineffective when the ratio between applicants and the number permits becomes very large. Though some sort of preference system may be needed for this proposed hunt to function as the author desires, it will be important to examine the system's design carefully, and it is possible that preference systems will not achieve the desired outcome regardless of their design.

The proposal also recommends a consistent 2000 Tier I permits be issued annually. In general, 2000 Tier I permits would be expected to result in a consistent harvest of about 1000 caribou, given a relatively long season. However, given the inherent difficulty in determining an accurate allowable Nelchina caribou surplus each year, it is not always clear if the projected surplus will be above or below 1000 (high end of the ANS) in any given year until just before the hunts begin due to census and composition survey flights. The preliminary harvest surplus numbers during the application period in the prior November/December are subject to change due to overwinter mortality and calf production the following spring. The Board must also consider the consistent annual federal subsistence take of 200 – 600 caribou. For all these reasons, it would be very difficult to predict, given the recommendations in this proposal, whether surplus caribou would be available year to year for drawing hunts until after the November/December application period.

PROPOSAL 48

EFFECT OF PROPOSAL: Repeal the Unit 13 community harvest permit hunt. All subsistence Nelchina caribou hunters would participate in a Tier I registration hunt.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: All Alaska residents are eligible to participate in the Unit 13 subsistence caribou hunts. All resident hunters currently have a choice whether to apply for the Tier I registration hunt or the community harvest permit hunt. Each hunt has a set of hunt conditions that hunters must agree to abide by, however there are no qualifications by which hunters will be excluded from either hunt (except the Failure to Report list from the prior year).

PROPOSAL 49

EFFECT OF PROPOSAL: This proposal would change the ANS for caribou in Unit 13 from 600-1000 to a set number of 500

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The board adopted the current ANS range in October 2010 following public testimony and deliberations. The Department of Law has advised the board that adopting an ANS range rather than a fixed number best meets the requirements of AS 16.05.258 (Subsistence Use and Allocation of Fish and Game).

Proposal 50

EFFECT OF PROPOSAL: This proposal provides an opportunity to review caribou seasons and permit conditions in effect for fall 2011 and spring 2012 hunting seasons (these regulations were adopted in October 2010). These regulations are reflected in the most recent November – December Tier I/II and Drawing Hunt Supplements, published by the department, and describe the hunt opportunities hunters applied for during that application period (November – December 2010).

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Department proposal – see Issue Statement. Additionally, as a housekeeping aspect of this recommendation, the Board adopted Record Copy 52 in October 2010, which outlined the current regulations and the associated hunt conditions. RC52 specified the bag limit for the community subsistence harvest hunt would be one caribou per person, and the bag limit for the Tier I registration hunt would be one caribou per household. Regulation 5AAC 92.050(a)(I) states that no more than one Unit 13 Tier I subsistence permit may be issued per household every regulatory year for caribou, and 5AAC 92.071(a)(1) states these permits will be distributed to heads of households. Technically only one community subsistence harvest permit is issued per group (and individuals receive harvest tickets), however it may be helpful if these regulations were clarified to reflect the intent of RC52, especially to clarify the difference between the community subsistence harvest hunt and registration Tier I subsistence hunts.

PROPOSAL 51

EFFECT OF PROPOSAL: This proposal would change the resident Dall sheep bag limit in Unit 11 from ¾-curl to full-curl.

DEPARTMENT RECOMMENDATION: **Amend if adopted.**

RATIONALE: Unit 11 encompasses the majority of the Wrangell Saint Elias National Park and Preserve. Sheep hunting pressure is distributed between Park and Preserve lands (these lands alternate across Unit 11). Hunting pressure on Park land is limited to a few accessible areas, only open to federally qualified subsistence hunters. Federal subsistence regulations allow any sheep to be harvested on both Park and Preserve lands. State hunting regulations provide opportunity for residents and nonresidents to hunt sheep on Preserve lands, as well as on state and private land in Unit 11.

Unit 11 is the only Game Management Unit south of the Brooks Range with a positive Customary and Traditional Use (C&T) finding for sheep. The Amount Reasonably Necessary for Subsistence Uses (ANS) is 60 – 75 sheep, and the harvest objective is to maintain a harvest of 60 or more rams. Due to the positive C&T finding state regulations are intended to provide a subsistence hunting opportunity for Alaska residents.

Since 1989, nonresidents have been limited to 1 ram, full-curl or greater across Unit 11. Between 1989 and 2000, residents were able to harvest any sheep. In 2001, the general state regulation was changed to 1 ram. In 2003, it changed again to 1 ram, $\frac{3}{4}$ -curl or greater. As the regulations were tightened up, hunter numbers declined (largest drop between 2002 and 2003). Harvests since 2003 have averaged 71 per year (range = 51 – 99; 64 in 2009). Residents harvest the majority of sheep in Unit 11, averaging 58 per year (50 in 2009) versus 13 per year taken by nonresidents (14 in 2009).

Sheep in Unit 11 have always been managed with unit-wide regulations for simplicity given the size of the unit. Maintaining population indices across 13,000mi² is difficult, and despite increased funding for sheep in recent years, the window for sheep surveys remains limited and flying is weather dependent.

Three blocks best represent sheep populations within the unit: north, southwestern, and southeastern Wrangells. Sheep population trends and dynamics are unique to each of these areas, and they should be considered in light of this proposal.

The highest quality sheep habitat in the north Wrangells in Unit 11 is in the Upper Copper River drainage. This area is mostly Park, which is open only to local federal subsistence hunters; the federal bag limit is any sheep. Although hunting pressure is considered high in this area due to good access, sheep numbers are stable and abundant. Between 2001 and 2007, the ram to ewe ratio declined from 52 to 32 rams per 100 ewes, but the percentage of rams full-curl or greater increased from 46% to 50%. No surveys are done in the Preserve, west of Drop Creek due to the historically low sheep numbers and harvest (0 – 3 taken per year). Two other small Preserve areas in this block include Goat Creek above Tanada Lake, and a very small area adjacent to the Nabesna Road above Natat Creek. Given the traditional history of subsistence sheep hunting throughout this northern block, and the lack of any substantial change in these sheep populations, changing the $\frac{3}{4}$ -curl regulation for this area would have limited effect and is not recommended.

Sheep in the southwest Wrangell's (Dadina River to the Kuskulana River) began declining in the late 1980s, and have been relatively low and stable for the past 5 – 10 years. The ram to ewe ratios have been stable, averaging 35 – 39 rams per 100 ewes, and the percentage of rams full-curl or greater has averaged 40 – 46% in recent years. These data are consistent between the Park and Preserve portions of this block; both receive moderate sheep hunting pressure. Changing the $\frac{3}{4}$ -curl regulation in this block is unnecessary, would have limited effect.

Sheep in the southeast Wrangells (MacColl Ridge, Hawkins Glacier, and Barnard Glacier) were abundant through the late 1990s. While total sheep numbers have since declined somewhat, the ram to ewe ratio has remained stable since 2000, averaging 25 – 40 rams per 100 ewes. While survey data are sparse, it appears the percentage of rams full-curl or greater has declined to 10 –

29% in recent years across the area. Given the exceptional trophy quality Dall rams in this area, it may not be in the best interest of conservation to allow the number of large full-curl plus mature rams to decline any further.

If the Board supports changing the ¾-curl regulation in Unit 11, the change could be limited to this block (east of and including the Nizina River drainage), where it could have a positive impact on the age structure of the population. While this area will remain important to subsistence as well as other sheep hunters, there may be some benefit to reducing hunting pressure, at least temporarily, theoretically allowing the number of ¾-curl plus rams to increase. Having more large mature rams and a healthy age structure in the sheep population is beneficial for many reasons, including a timely and orderly rut which leads to preferred parturition patterns, the ability to pass on learned behavior and traits to younger sheep, and also long-term sustainability of the quality genetics sought by the majority of sheep hunters.

There are additional considerations that must also be addressed. By requiring residents to focus only on full-curl rams, this actually puts more harvest pressure on a smaller number of rams. Other side effects of this change would be less rams harvested total, and some harvest would shift from residents to nonresidents due to the inherently high success of guided nonresident hunters. Due to lower sheep numbers, hunter effort in Unit 11 has already declined dramatically for both residents and nonresidents, and the Board must consider the current resident harvest in light of the ANS. If further reductions in hunting opportunity are warranted, it may be necessary to reduce nonresident hunting opportunity first.

PROPOSAL 52

EFFECT OF PROPOSAL: This proposal would change the resident Dall sheep bag limit in Unit 11 from ¾-curl to full-curl, and give residents two additional days to hunt sheep before nonresidents, changing the resident hunting season from 10 Aug – 20 Sept to 8 Aug – 20 Sept.

DEPARTMENT RECOMMENDATION: Do Not Adopt

RATIONALE: See department comments pertaining to Unit 11 sheep hunting opportunities and issues under Proposals 51.

This proposal suggests that there is abuse of the ¾-curl regulation by hunters taking sublegal rams in full-curl hunting areas and claiming them as taken in Unit 11. Regardless, any decision to change this sheep hunting regulation should be based on Unit 11 population and hunter concerns, not speculation as to illegal activity. If a substantial number of individuals are still concerned that sublegal rams could be claimed as taken from Unit 11 if a ¾-curl regulation remains, there are several options to address this concern including the creation of a registration permit, requiring Unit 11 sheep to be sealed in specific offices such as Glennallen, Tok, and Palmer, and/or requiring genetic samples be taken from all Unit 11 rams.

We do not support adding two additional days to the beginning of the resident sheep season, as this may have unintended consequences and will not likely satisfy the requirement of a subsistence priority for resident hunters. Most sheep hunts statewide begin 10 August. If the Unit

11 resident season begins 8 August, this could potentially draw additional sheep hunting pressure to this area from hunters with no history or tie to the area, increasing competition for existing resident Unit 11 hunters over the hunt opener.

PROPOSAL 53

EFFECT OF PROPOSAL: This proposal would change the resident Dall sheep bag limit in Unit 11 from ¾-curl to full-curl.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See department’s comments pertaining to Unit 11 sheep hunting opportunities and issues under Proposals 51 and 52.

PROPOSAL 54

EFFECT OF PROPOSAL: This proposal would change the bag limit for sheep in all of Unit 13 to 1 ram, eliminate the drawing hunts, and would eliminate the sealing requirement for this unit only.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: While we recognize the inherent variability in Dall ram horns and the subjective nature of judging full-curl, these issues alone do not justify eliminating all current Unit 13 Dall sheep horn restrictions, drawing hunts, and sealing requirements.

The primary goal of the sealing program is to encourage hunters and guides to be more selective when judging sheep in the field, specifically to avoid the taking of sublegal rams. A secondary goal of the program is to allow the Department to collect much needed data. After several years of changes, the sealing program is now consistent among all sport and many subsistence hunts statewide. Sealing is also a nationwide practice supported by all agencies that administer sheep hunts. This proposal seeks to change the sealing regulation in only a portion of the state, which will eliminate that consistency.

Current Dall sheep regulations in Unit 13 are area specific, and are designed for long-term sustainability. Allowing an any-ram bag limit in Unit 13, openly available to all hunters under a general season, would lead to overharvest within a couple years and would not be sustainable.

PROPOSAL 55

EFFECT OF PROPOSAL: This proposal would remove that portion of the Tonsina Controlled Use Area in subunit 13D south of the Uranatina River, east of a line running from the south fork of the Uranatina River thru the pass along the eastern most tributary on the north side of the Tiekel River to its confluence with the Tiekel from DG720, and add it to RG580.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: This southeast corner of the Tonsina Controlled Use Area (TCUA) provides the only river boat accessible goat hunting along the Copper River under DG720 (recently combined DG718 and DG719 areas). While the density of goats in the TCUA is relatively low, goats are consistently seen in this portion of the TCUA around Cirque Creek. The goat habitat in this area is limited (~100mi²), and the Cirque Creek area provides a population source for Fall and Ernestine Creeks, two of the most popular road accessible hunt areas within DG720. The TCUA is also somewhat isolated from other goat habitat across the Copper and Tielke Rivers. It would be irresponsible to open this small portion of the TCUA to registration hunting for conservation reasons, particularly given the growing popularity of the recent additions to RG580.

In 2007, the Board of Game added a portion of 13D south of the TCUA along the Copper River to the RG580 hunt. This area is river boat accessible and provides limited fly-in opportunity to an area that was rarely hunted under the drawing permit. The harvest from this area has steadily increased since that time: 1 in 2007, 3 in 2008, 3 in 2009, and 7 in 2010 (preliminary). In 2010, 5 of the 7 goats taken were by guided hunters.

The new proposed area around Cirque Creek is a relatively short river boat ride, less than an hour from Chitina, and is closer than the registration area south of the TCUA. The Cirque Creek area would be expected to receive considerable hunting pressure from the Copper River if it was added to RG580. While this would provide hunting opportunity for a currently underutilized area, it would be expected to significantly reduce walk-in TCUA hunting opportunity for DG720 hunters.

PROPOSAL 56

EFFECT OF PROPOSAL: This proposal would open a general resident moose season in Unit 13 with a bag limit of 1 bull with spike/fork antlers or 3 or more brow tines on one side or a spread of 50 inches or more, with season dates 19Aug – 25 Aug.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: See Department Proposal 59 and related comments

PROPOSAL 57

EFFECT OF PROPOSAL: This proposal would close nonresident moose hunting in subunit 13E (until population objectives are met).

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue. Nonresident moose hunting was closed in Unit 13 between 2002 and 2008, and was recently re-opened to nonresidents. The moose population across Unit 13, including 13E has been recovering in response to active wolf management, as reflected in moose survey data and resident harvest figures. Resident general season moose harvest in 13E has steadily increased in recent years, from 96 moose harvested in 2000 to 164

harvested in 2009. Since 2006, the unit-wide moose harvest has consistently exceeded the Amount Reasonably Necessary for Subsistence Uses (ANS) of 300 – 600 moose. The total harvest continues to increase each year.

In 2009, nonresident moose hunting was re-opened under a limited drawing hunt for large bulls, 50” or greater or with 4 or more brow tines. Only 10 permits were issued in 13E in 2009, 2 bulls were taken. In 2010, 20 permits were issued, and again 2 bulls were taken.

Intensive management and related ungulate harvest programs are designed to slowly work towards meeting both population and harvest objectives. While the moose population is increasing in some portions of Unit 13 faster than others, the low number of nonresident permits and the restrictive bag limits are sustainable.

In reference to the concern over the August 2010 moose hunt opening, that opportunity was provided in response to a July 2010 court ruling requiring the adoption of additional moose hunting opportunity for resident moose hunters. For recommendations per continuation of the August hunt, see Department comments under Proposal 59.

PROPOSAL 58

EFFECT OF PROPOSAL: This proposal reviews the population and harvest objectives for moose in Unit 13.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The department stated at the October board meeting that the harvest objectives for subunit 13E may not be achievable. The board and Department of Law indicated that the issue should be addressed at the next meeting. Moose numbers in subunit 13(E) have increased in recent years, although somewhat slowly. The annual harvest has steadily increased, although it remains well below the objectives. The population estimate is near the lower population objective, however, harvest must increase 83% to reach the lower harvest objective. The discrepancy between the harvest and population objectives of 13(E) suggests there may be a need to re-evaluate one or the other.

Given the vast size of the subunit, it is likely the population estimate could be improved. If the population is lower than believed, the objectives may be appropriate. The department can try to improve the population estimate before the 2013 board meeting.

PROPOSAL 59

EFFECT OF PROPOSAL: Adds an additional 7 days to the current general moose season in Units 13B, 13C, 13D, and 13E, with a bag limit of one bull with spike-fork or 50-inch antlers or antlers with 3 or more brow tines on at least one side (SF/50” 3BT).

DEPARTMENT RECOMMENDATION: **Do Not Adopt.**

RATIONALE: While this is a Department proposal, due to recent moose harvest and survey data collected, we cannot continue to support this added hunt opportunity for conservation reasons.

In July 2010, a court decision required the board to adopt additional moose hunting opportunity for resident moose hunters for the upcoming 2010-11 season. The 15 – 25 August hunt was recommended at that time by the Department to fulfill the requirement by the court. This hunt was supposed to provide a replacement opportunity for those hunters planning to participate in the community moose hunt that had been recently invalidated by the court. This hunt opportunity was created during an emergency Board of Game meeting, and was only valid for 120 days.

Board proposals for this cycle were due in October; although moose harvest information was preliminary and moose counts had yet to be flown. This proposal was written in anticipation of further increases in moose counts.

Since October, the preliminary harvest from the August 2010-11 general moose hunt has increased to 139 bulls. As expected, the moose were largely taken in accessible areas adjacent to urban centers. By subunit, 77, 29, 7, 3, and 23 moose were taken in 13(A), 13(B), 13(C), 13(D), and 13(E) respectively.

In 2009-10, a total of 860 moose were taken in Unit 13. To date, the preliminary total unit-wide harvest for 2010-11 is 874; this number may increase further as late reports are received. While increased harvest is positive, we must closely monitor the population status to ensure the increased harvest opportunities do not push bull:cow ratios too low or stop population growth.

Following the 2009-10 harvest, the overall bull:cow ratio declined across the unit (particularly in accessible areas), but overall moose numbers continued to increase. In 2010-11, bull:cow ratios dropped further, and overall bull numbers declined in most areas. By subunit, 22, 32, 27, 72, and 31 bulls:100 cows were observed in 13(A), 13(B), 13(C), 13(D), and 13(E) respectively. Given even lower bull:cow ratios and total bull numbers in accessible areas, providing any SF/50” 3BT general hunting opportunity at this time would have a negative impact on the Unit 13 moose population. Future hunting opportunities in the unit would be limited as a result.

PROPOSAL 60

EFFECT OF PROPOSAL: This proposal would establish a late season moose permit hunt 20 November – 10 December within the Tonsina Controlled Use Area (TCUA) in subunit 13(D); moose may not be taken within 2 miles of the Edgerton and Richardson Highways.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The TCUA is currently non-motorized (and no pack animals are allowed) between 26 July and 30 September. The TCUA was originally established to provide walk-in sheep hunting opportunity. Moose harvest has been relatively low within the area due to this restriction.

While providing maximum sustainable harvest opportunity is preferable, no moose surveys are flown in this immediate area. Moose are generally considered to be relatively low and stable in this area. Currently, moose are harvested throughout the TCUA under the state general season hunt 1 September – 20 September; bag limit is S/F 50” 4BT. Moose are also harvested in the BLM federal subsistence hunt corridor along the Richardson Highway (west boundary of the TCUA) from 1 August – 20 September; bag limit is one bull. The state harvest ranges 2 to 9 per year for the entire TCUA, but the federal subsistence take ranges from 5 to 13 bulls per year from just the Richardson highway corridor. It is unclear whether additional harvest from the TCUA would be sustainable.

Additionally, the proposal suggests a post-rut winter hunt period. There are no other moose hunts in Unit 13 during this time, however moose survey history shows that moose are highly concentrated in open upland areas at this time. Bulls particularly along the two popular winter access routes in the northern TCUA (Bernard and Fivemile creek trails) would be highly vulnerable to harvest. This hunt would likely reduce existing fall moose hunting opportunities. Finally, without further assessment of the effect this hunt would have on wintering sheep in the area, we cannot support this proposed hunt.

PROPOSAL 61

EFFECT OF PROPOSAL: This proposal correctly states that the current Unit 13 moose hunting regulations reflect those regulations in place in 2009. This is because the regulations passed during the July emergency Board of Game meeting were only valid for 120 days. Essentially, the following community subsistence harvest permit moose hunt regulations are again valid: 1 bull may be taken August 10 through September 20 in Unit 13 (however, no more than 100 bulls that do not meet general hunt antler restrictions may be taken). The bag limit remains SF/50” 4BT in Unit 12, with season dates August 24–28 and September 8–17.

DEPARTMENT RECOMMENDATION: No Recommendation (retention of the community subsistence harvest moose hunt); Amend if Adopted (moose bag limits and/or seasons)

RATIONALE: The Department has no recommendation regarding retention of the community harvest hunt as that is an allocation issue. However, bull:cow ratios have declined below objectives in heavily hunted areas and harvest should be reduced accordingly. See the Department comments pertaining to Unit 13 moose hunting opportunities and issues under Proposals 59. In 2009-10, 100 bull moose were harvested during the community subsistence harvest permit moose hunt. Of these, 25 were taken during August (prior to the general season) and 70 were any-bulls, meaning they did not meet general antler restrictions. The harvests by subunit are listed in the table below.

Unit	HARVEST		ALLOCATION
	General season (antler restricted) bulls	Any-bulls (those not meeting general season antler restrictions)	Any-bulls
11	1	0	15

12	0	1	0
13A	5	15	20
13B	5	23	25
13C	2	11	15
13D	1	7	10
13E	16	13	15
<i>Total</i>	<i>30</i>	<i>70</i>	<i>100</i>

In 2010-11, an August SF/50 3BT hunt was instituted to offset the canceled community harvest hunt. The net effects of these 2 hunts - plus perhaps other factors affecting survival - have resulted in bull ratios below objectives in heavily hunted areas.

Harvest was highly concentrated in four small areas: Little Nelchina near Eureka (Glenn Highway), the Maclaren River (Denali Highway), Chistochina to Indian River (Tok Cutoff), and the Jack River near Cantwell (Parks Highway). One bull was taken in Boulder Creek in Unit 11 and another was harvested near the Little Tok River in Unit 12.

In Count Area (CA) 13 (Little Nelchina near Eureka), the bull:cow ratio declined from 29:100 to 27:100 between 2008 and 2009 surveys. The ratio has since declined further to 21:100 in 2010, and is below the objective of 25:100. In CA6 (Maclaren River / Denali Highway), the same trend was observed. The bull:cow ratio declined from 30:100 to 28:100 between 2008 and 2009 surveys. The ratio has since declined further to 21:100 in 2010, and is also below the objective of 25:100. In CA 21 (Jack River near Cantwell) no survey was flown in 2008, but the bull:cow ratio declined from 30:100 in 2009 to 27:100 in 2010.

If the board continues the community subsistence harvest moose hunt, the department recommends restricting the bag limit and/or the season dates for one or more GMU 13 moose hunts in heavily hunted areas. Given the changes in the community subsistence harvest hunt regulations pertaining to eligibility, the department expects increased participation. If the board reduces the number of any-bulls available to participants in the community subsistence harvest hunt, the department would expect the allocation to be taken quickly, and the remaining community harvest hunters would be limited to antler restricted bulls.

The proposal also suggests delineation between moose populations in Unit 13, and suggests the any-bull component is a different population than the S/F 50' 4BT component. There is no evidence to suggest that these are separate stocks in GMU 13.

PROPOSAL 62

EFFECT OF PROPOSAL: This proposal would establish a community subsistence harvest moose hunt in the Copper Basin.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: This regulation is already in place, see department comments on Proposal 61.

PROPOSAL 63

EFFECT OF PROPOSAL: This proposal would change the dates of existing Unit 13 drawing moose hunts from 1-20 September, to 21-30 September, following the general season hunts.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: This proposal refers to moose permit hunts in Unit 13, which would technically include both nonresident drawing permit hunts (50” 4BT bulls) and resident drawing permit hunts (1 bull), although the discussion refers only to the resident permit hunts.

Current harvest levels for the nonresident drawing hunts are low; only 11 moose were taken in 2009 and again in 2010. Harvest levels for the resident drawing hunts are much higher with 64 moose taken in 2009, and 90 taken in 2010. The resident drawing hunts are in remote areas with increasing numbers of moose and limited hunting pressure; the liberal bag limit (1 bull) was recommended as an incentive to help hunters take advantage of the additional harvest opportunities in these hard to access areas. The current resident drawing hunts have occurred for 2 years and seem to be working well. Permit numbers can now be adjusted to result in a desired sustainable harvest. If hunt dates were altered, harvest would be difficult to predict for a couple years. Altering the season dates for drawing moose hunts in Unit 13 is not recommended at this time.

PROPOSAL 64

EFFECT OF PROPOSAL: This proposal would modify the Unit 13 general season hunt bag limit to 1 bull with 50 inch antlers or antlers with 3 brow tines on at least one side (eliminating the spike / fork component of the current season). The season would remain resident only and dates would remain 1-20 September.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: In the past three years (2007-2009), the annual spike / fork (S/F) component of the general harvest has averaged 203 bulls, 35% of the total take. This harvest opportunity would be eliminated with this proposal. While most of these yearling bulls would be expected to survive and be available for harvest at a later date, it is generally accepted that yearling moose have higher mortality rates than older moose.

Estimating the number of moose that would be available adding a 3 brow tine (BT) option is more difficult. The 2010 August general season hunt data (bag limit S/F 50” 3BT) provides a snapshot of the hunting pressure and harvest that would be expected should the entire general season shift from a 4BT option to a 3BT option. Of the preliminary harvest of 139 bulls, 51 were S/F and 88 were larger bulls. Of these larger bulls, 36 would have been legal during the September general season (22 were 50” or greater and an additional 14 had 4 or more BT), 52 would not have been. Using this scenario, 51 S/F moose (37%) would be unavailable for harvest, but they would be replaced with 52 3BT (37%) that would be available.

Initially this seems to be an equal tradeoff, but there are other considerations. SF bulls have been legal to harvest annually in Unit 13 for some time, whereas the 3BT bulls were protected prior to this 2010 hunt. We would expect the available number and harvest of 3BT bulls to decline if this hunt were repeated in 2011. While there is an expectation that the additional S/F bulls would eventually help bolster the 3BT component, there is no limit on how many of these moose could be harvested. The result would likely be a shift towards lower age classes of bulls remaining after hunting season.

Current moose count data already indicate a shortage of large bulls in heavily hunted accessible areas following the hunting season, particularly those with 4 BT. Many of these areas already have rutting groups dominated by bulls in the mid-40” class. Expanding the hunting opportunity to include 3BT bulls would worsen this situation.

The objective of 25 bulls:100 cows is premised on there being a moderate abundance of older/larger bulls in the population. If the majority of the bulls remaining for the rut (after hunting season) are 3 years of age and younger, there could be serious consequences for calving and general parturition patterns the following spring. Given the current Unit 13 moose population composition and the expectation of continued heavy hunting pressure, we cannot support this general season change in the bag limit.

PROPOSAL 65

EFFECT OF PROPOSAL: Define an ANS for wolves in Unit 13.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: There is a positive C&T finding for wolves in Unit 13, but no ANS has been set. Wolves occur throughout Unit 13 and no biological concerns have been identified. The wolf population in Unit 13 is currently managed under an intensive management program. The fall wolf population in Unit 13 has averaged 278 wolves and the annual take has averaged 108 wolves per year since 2005. Currently, the average annual take by hunters and trappers is 67 wolves per year; control take averages 41 wolves per year. The harvest and population are stable.

PROPOSAL 66

EFFECT OF PROPOSAL: Define an ANS for wolves and Mentasta caribou in Unit 11.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: There are positive C&T findings for both wolves and Mentasta caribou, but no defined ANS for either species. The fall wolf population in Unit 11 has averaged 120 wolves and the annual harvest has averaged 23 wolves / year since 1985. The harvest and population are stable. The Mentasta Caribou population has been low and somewhat stable at less than 500 animals since the late 1980’s. The herd declined significantly in the 1980’s and early 1990’s and has never recovered to the previous level. Due to herd size there has been no hunting allowed on

the Mentasta Caribou herd since 1989. There has been no recent harvest with which to determine an ANS number.

PROPOSAL 67

EFFECT OF PROPOSAL: This proposal would eliminate the designated hunter options currently allowed under community subsistence harvest programs, requiring that participants in a community subsistence harvest hunt be able to harvest only one animal (per species) for a family member which is similar to current proxy regulations.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The intent of the community subsistence harvest hunt provision in GMU 13 is to provide for opportunities for subsistence hunting in conformance with the board’s C&T findings, including sharing of harvests by designated hunters. Of the moose taken in the 2009 Copper Basin community hunt, 34 (34%) were harvested by designated hunters. A total of 36 (28%) caribou were harvested by designated hunters.

PROPOSAL 68

EFFECT OF PROPOSAL: Should the Copper Basin community hunt be discontinued, this proposal recommends revising the Tier II subsistence permit point system for caribou and moose in Unit 13.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue.

PROPOSAL 69

EFFECT OF PROPOSAL: This proposal would modify the exceptions for the Clearwater Controlled Use Area (CUA) in Unit 13 to include all drivable surfaces at the Alpine Creek lodge.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Exempting a specific property in regulation is unnecessary, but the concerns in this proposal could be mitigated with a simple wording change. The Alpine Lodge property is adjacent to the Denali Highway, like several pullouts along the Denali Highway, also technically within the Clearwater CUA.

Changing the regulation exception wording to “... Denali Highway and adjacent highway vehicle parking areas.” would provide ample leeway for Alpine Lodge owners and their clients, without sacrificing the intent of the CUA.

PROPOSAL 70

EFFECT OF PROPOSAL: This proposal would restrict the use of ORVs in subunit (13B) and (13E) within a ¼ mile corridor along the Maclaren River (with the exception of the recognized crossing of Moore’s trail on the lower river) and along the Susitna River upstream of the confluence with the Oshetna River.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue. If adopted the proposed change could eventually affect management of increasing moose populations in remote areas of Unit 13. The proposer suggests that hunters are now utilizing a combination of boats and ORVs to access remote areas previously unreachable. This change may largely be the result of successful and currently ongoing intensive wolf management, and the increased moose hunting opportunities in these remote areas. Without many landing spots for small aircraft, hunters have limited options for accessing these areas.

PROPOSAL 71

EFFECT OF THE PROPOSAL: Eliminate the sealing requirement for beaver and marten in Unit 16.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Beaver populations appear stable. In Unit 16 beavers are abundant and harvest by trappers is relatively low due to low prices for beaver pelts. Since the department has no concerns about overexploitation removing the sealing requirement for beaver would ease the burden on trappers and is recommended.

Marten populations are cyclical and the value of marten pelts has the potential to attract trapper effort. The ability of the Department to track marten harvest is important future management of the species. Retaining the sealing requirement for marten is recommended.

PROPOSAL 72

EFFECT OF THE PROPOSAL: Close a portion of the Palmer Hay Flats in Unit 14A to trapping.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue, and there are no biological concerns. The department has had to issue permits to take nuisance beavers to mitigate damage to recently installed structures and vegetation in and around the boardwalk and trail system at Reflections Lake. If this proposal is adopted there will likely be an increase in the number of nuisance permits required to address ongoing concerns.

PROPOSAL 73

EFFECT OF THE PROPOSAL: Increase the black bear bag limit to three bears per year in Unit 14A

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Unit 14(A) has no closed season and the one bear a year bag limit provides ample opportunity while minimizing nuisance bear complaints in and around Palmer, Wasilla, and associated communities. There is no biological data or justification to raise the limit on black bears in the unit.

PROPOSAL 74

EFFECT OF THE PROPOSAL: Allow guide-outfitters to have up to ten bait stations in Unit 16.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: Currently 5 AAC 92.044 provides for guide-outfitters to have up to 10 bait stations in the predator control portion of Unit 16. The guide-outfitter is not limited to using only 2 of those bait stations for non-resident clientele. The proposer desires a provision allowing for the establishment and use of up to 10 bait sites for all of Unit 16. Currently, there is a considerable amount of resident bear bait hunting occurring off of the road system in the non-control portion of Unit 16A (the area that would be added with this proposal). Because of this , the department supports the current number of 10 bait stations for registered guides.

The alternative of applying the 10 bait station limit statewide may be better addressed at a statewide Board of Game meeting.

PROPOSAL 75

EFFECT OF THE PROPOSAL: Make a positive C&T finding for bear and moose in Unit 16A

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Unit 16A is designated as a non-subsistence area by the Joint Boards of Fisheries and Game. That decision would need to be reversed before a positive C&T finding for moose and bear in Unit 16A could be established.

PROPOSAL 76

EFFECT OF THE PROPOSAL: Open a year-round season for brown bear in Unit 16.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: No biological concerns have been identified for brown bears in Unit 16 and the additional opportunity to harvest bears can be accommodated. Moose calf recruitment in Unit 16 is low while birth rates, twinning rates, pregnancy rates, and adult survival is high. Studies in the area indicate that predation by brown and black bears are responsible for the low recruitment. Allowing the additional brown bears to be taken in the summer may increase moose calf recruitment.

PROPOSAL 77

EFFECT OF THE PROPOSAL: Include brown bears in the Unit 16 predator management plan

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Take no action based on actions taken in Proposal 103.

PROPOSAL 78

EFFECT OF THE PROPOSAL: Remove black and brown bears from the intensive management plan for Unit 16.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Unit 16 has been identified under the intensive management provisions in state law (A.S. 16.05.255 (e-g)) as an area where the “consumptive use of the big game prey population is a preferred use”. Under this law the Department is required to take steps to increase the prey population. Studies in the unit as well as other studies in Alaska and elsewhere have identified that predation on moose calves by brown and black bears can prevent an increase in this prey population. Therefore, predation by bears must be considered when attempting to increase this prey population.

The first part of the proposal is not a proposal for regulatory change.

PROPOSAL 79

EFFECT OF THE PROPOSAL: End the drawing hunt for goats in unit 14(A) and replace it with a resident only registration goat hunt.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the decisions the Board makes on proposal 80.

PROPOSAL 80

EFFECT OF THE PROPOSAL: Retain the unit 14(A) drawing goat hunt September 1 – October 31. Add an October 1 – October 31 registration goat hunt for residents only.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal – see issue statement.

PROPOSAL 81

EFFECT OF THE PROPOSAL: End the drawing hunt for goats in unit 14(A) and replace them with two registration hunt areas. Each area would be split into a resident and a nonresident registration hunt creating four separate registration hunts.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the decisions the Board makes on proposal 80.

PROPOSAL 82

EFFECT OF THE PROPOSAL: Restrict antlerless moose permit holders from hunting antlered moose in Unit 14.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The effect of this proposal is to allocate moose harvest opportunity amongst moose hunters. Currently moose hunters holding an antlerless permit in unit 14A may take either an antlerless moose or a bull under the spike/fork 50” or 3 or more brow tines regulation. The Department desires to encourage cow harvest and simultaneously maximize opportunity for bull hunters. Adopting this proposal may result in fewer people putting in for these very popular draw hunts thus increasing the chances of those that do, and may increase the chances of hunters finding a legal bull for those that did not win a permit.

PROPOSAL 83

EFFECT OF THE PROPOSAL: Extend the hunting season for spike/fork bulls only from October 1 to October 15 in Unit 14A.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The results of the 2008 composition survey, which occurred after hunting season, indicate that the spike/fork component of the bulls was 14% (41 out of 290) and the overall bull: 100 cow ratio was 23 (24.7 in a comp count in 2009). Based on the current bull ratio in 14A (23), additional bull harvest is not recommended. Extending the season for the spike/fork component may make them exceptionally vulnerable to hunters during this time period and reduce the bull to cow ratio to a less than desirable number.

PROPOSAL 84

EFFECT OF THE PROPOSAL: Require antlers and jaw bones of bull moose to be provided to the Department for Unit 14A.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Implementation of this program would be difficult to administer under the harvest ticket system currently in place. The ten year average of bulls taken in Unit 14A is 375. Because of this, the proposal would greatly increase staff workload as well as increase the burden of compliance for successful moose hunters in Unit 14A. The Department does not feel that the benefit to moose management gained by these reporting requirements is sufficient to offset costs and increased demands.

PROPOSAL 85

EFFECT OF THE PROPOSAL: Provide antlerless moose permits for archery hunts in Unit 14A

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue.

PROPOSAL 86

EFFECT OF THE PROPOSAL: Establish a draw hunt for any antlered bull in Unit 14A

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The latest S & I survey in 2008 estimated a bull ratio of 23 bulls:100 cows, and a composition survey conducted in 2009 found a ratio of 25 bulls:100 cows. Bull ratios less than 25 have been shown to increase the number of second and third estrus calves born which have a decreased chance of survival. Therefore the Department does not recommend authorizing additional harvest at this time. The management plan calls for maintaining the bull ratio between 20 – 25 bulls:100 cows.

However, a very limited drawing hunt for “any bull” during a different time period could be established for specific portions of the unit where some additional opportunity could be provided when the population survey shows a bull: cow ratio of over 25:100 cows.

PROPOSAL 87

EFFECT OF THE PROPOSAL: Establish a winter antlerless moose ‘hot-spot’ special draw hunt in Unit 14A to address potential vehicle collision areas and serious nuisance moose issues in the Matanuska/Susitna Valley areas.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Staff proposal – see issue statement. Amend to allow the taking of nuisance bulls should the need arise.

PROPOSAL 88

EFFECT OF THE PROPOSAL: Antlerless moose hunt reauthorization for Unit 14A

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal – see issue statement

PROPOSAL 89

EFFECT OF THE PROPOSAL: Establishes a winter draw hunt for antlerless moose in Unit 14A

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Staff proposal – see issue statement. There is currently a winter season, Nov. 1 - 15, in regulation for the antlerless drawing hunts in Unit 14A, although no permits have been issued in recent years. The department suggests amending the current season dates to Nov. 1 – March 31. This would provide flexibility to adjust seasons as dictated by winter conditions.

PROPOSAL 90

EFFECT OF THE PROPOSAL: Close the antlerless moose permit hunt in Unit 14A and open a spring brown bear season allowing the use of bait stations.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: Currently the moose population in Unit 14A is above population objective. Antlerless hunts in Unit 14A have not had a negative effect on the population and continue to provide extra opportunity for hunters.

The brown bear bag limit is one bear every four years. Moose calving and recruitment is not significantly impacted by the current brown bear population.

PROPOSAL 91

EFFECT OF THE PROPOSAL: Open a mid-winter registration hunt for antlerless moose in Units 14A and 14B.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on action for proposal 87as it pertains to Unit 14A. Currently the moose population in Unit 14B is approximately 1662 which is below objective (2500 – 2800). An antlerless hunt in this unit at this time would reduce the potential for this population to meet the objective.

PROPOSAL 92

EFFECT OF THE PROPOSAL: Establish an antlered bull draw hunt in Unit 14B from September 25 – 29.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: The bull to cow ratio for moose in Unit 14B was 34 bulls:100 cows in 2009. This was an increase since the last survey was conducted in 2005 (29.8 bulls:100 cows). A limited drawing permit antlered bull hunt would improve the bull to cow ratio without having a significant impact on population growth. The Department recommends amending the season dates for this hunt to remain within the regular season to avoid confounding enforcement efforts. An alternative would be a totally separate season in early November for a period such as the first 10 to 15 days of the month.

PROPOSAL 93

EFFECT OF THE PROPOSAL: Delay the start of the general moose season in Unit 16B to September 1 and extend the season until September 25.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Local hunters and meat processors have made comments to the Department regarding meat spoilage due to hunting during warm weather. However, the proposal would shorten the season by 5 days, resulting in a net loss of hunting opportunity. Adding days to the end of the current season may result in a few more bulls being taken, although Unit 16B currently has a high bull:cow ratios of over 38-57 bulls per 100 cows.

The Department recommends aligning the season with other seasons in the valley areas including 14A, 14B, and 16A. As such the amendment would include Unit 16A and align the general moose season in all of the units to August 25 through September 25.

The Board has determined that the moose population in subunit 16B supports customary and traditional subsistence uses. Prior to adopting any changes to regulations in this subunit, the board should determine if the changes continue to provide reasonable opportunities for subsistence hunting.

PROPOSAL 94

EFFECT OF THE PROPOSAL: Open a non-resident moose hunting season in Unit 16B.

DEPARTMENT RECOMMENDATION: **Amend if Adopted**

RATIONALE: This is an allocation issue. The subsistence and general hunting seasons in Unit 16B are established in 5 AAC 85.045 (14) and are based on the number of moose available for

harvest. While the current surplus bull estimate is above the 240 minimum required in regulation for a non-resident moose hunt, the Department believes that it is not significantly above the number needed for this rebuilding population to warrant a general season non-resident hunt. However, if the Board of Game chooses to have a non-resident hunt in Unit 16B, the Department would prefer a limited draw hunt for specific areas of the unit that have been identified as having a high bull to cow ratio and currently showing limited resident use.

PROPOSAL 95

EFFECT OF THE PROPOSAL: Delay the start of the general moose season in Unit 16B to September 1 and close it September 20 or 25.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the board action on proposal 93

PROPOSAL 96

EFFECT OF THE PROPOSAL: Change the general moose hunting season dates to September 1 – September 30 in Unit 16B.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the board action on proposal 93

PROPOSAL 97

EFFECT OF THE PROPOSAL: Eliminate all moose hunting in GMU16B except Tier II hunts

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The combined ANS findings for the mainland portions of 16B affected by this proposal total 199-227 moose. Subsistence and general hunting seasons in Unit 16B are established in 5 AAC 85.045 (14) and are based on the number of moose available for harvest. Using the most recent GSPE surveys of the mainland portion of Unit 16B, the population can sustain a harvest of greater than 240 bulls. In the current regulation when the harvestable portion of the population is greater than 240 bulls, than up to 260 Tier II permits may be issued and there will be a general resident and non-resident hunting season.

PROPOSAL 98

EFFECT OF THE PROPOSAL: Change the season for hunting moose in Unit 16B

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the board action on proposal 93

PROPOSAL 99

EFFECT OF THE PROPOSAL: Eliminate the winter season for moose hunts in Unit 16B.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: We have reason to believe that the moose taken in the winter hunt are from a different sub-population and are not available in the fall hunt. Hunters in the winter hunt are typically using snow machines on the river corridors and do not have a major disturbing effect on the animals. The board has found that the current fall and winter seasons provide reasonable opportunities for subsistence hunting of moose in subunit 16B. The board would need to reevaluate that finding if it chose to eliminate the winter hunt.

PROPOSAL 100

EFFECT OF THE PROPOSAL: Reauthorize antlerless hunts on Kalgin Island in Unit 16B

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal – see issue statement

PROPOSAL 101

EFFECT OF THE PROPOSAL: Reduce the wolf hunting bag limit Unit 16(A) from 10 wolves to 1 wolf and eliminate nonresident opportunity to harvest a wolf in unit 16(A).

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This proposal allocates wolf hunting opportunity. However there is no need to adjust seasons or bag limits for residents or nonresidents to ensure the continuation of this wolf population. Wolf hunting seasons and bag limits were liberalized in Subunit 16A to reduce the wolf population and in turn reduce wolf predation on moose. Wolf hunting is often opportunistic and generally has low success. During the past 20 years no hunter in Unit 16(A) has taken more than 4 wolves in a single season. In the last 20 years only 6 wolves were harvested by nonresident hunters in 16(A). Based on these statistics a bag limit reduction is not necessary to ensure the survival of 7 wolves within the subunit.

PROPOSAL 102

EFFECT OF THE PROPOSAL: Define an ANS for wolves in Unit 16.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: If the Board acts on this proposal, it would only apply to Unit 16B, as 16A is currently a non-subsistence area. Wolves occur throughout Unit 16 and no biological concerns

have been identified. The wolf population in Unit 16 is currently managed under an intensive management program. The fall wolf population estimate in the Unit has ranged from 59-114 wolves and the annual take has averaged 32 wolves per year since 2005. Currently, the average annual take by hunters and trappers is 12 wolves per year; control take averages 20 wolves per year.

PROPOSAL 103

EFFECT OF THE PROPOSAL: Reauthorize the intensive management plan for Unit 16.

DEPARTMENT RECOMMENDATION: Amend and **Adopt**

RATIONALE: Staff proposal – see issue statement. In addition, the Department would like to consider the addition of brown bear predation management in an experimental format in a specific portion of Unit 16B. Currently the Department has conducted research on the causes of moose calf mortality in the Shirleyville area of Unit 16B. Our first year results have shown that brown bears are responsible for 50% of the moose calf mortality during the first 4 months of life. The Department would like to include brown bears in the current predator control program in this area to determine if a targeted reduction in the brown bear population has a measureable impact on the survival of moose calves.

PROPOSAL 104

EFFECT OF THE PROPOSAL: Lengthen the beaver trapping season in GMUs 9 and 17.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Beaver are numerous in GMUs 9 and 17 and reported harvests in recent years are a fraction of those of the past. Hides may be prime through May 31. Rivers and lakes in this area are typically not safe for travel on the ice in late April and May, though during some years open water would provide increased opportunity for those wishing to trap then. The Department would be concerned should the non-target take of river otters become excessive.

PROPOSAL 105

EFFECT OF THE PROPOSAL: Allow same-day airborne hunting of black bears at bait stations in Region IV.

DEPARTMENT RECOMMENDATION: **Amend if Adopted**

RATIONALE: Black bear populations in Region IV are healthy in areas with suitable habitat and no biological concerns have been identified. Bear harvests in most Units of Region IV are sustainable and harvests are generally low in remote areas where airplanes are most suitable for accessing bait stations. In areas with greater access such as Subunit 14A where harvests are high, a bag limit restriction was established to control harvests. The Department does not recommend liberalizing methods of taking black bear over bait in Subunit 14A.

PROPOSAL 106

EFFECT OF THE PROPOSAL: Establish black bear trapping seasons and bag limits in all Region IV Units.

DEPARTMENT RECOMMENDATION: **Amend if Adopted**

RATIONALE: Black bear populations are not limited by harvest in Region IV and no biological concerns have been identified. However several regulations that affect black bear trapping must be reviewed before black bears can be trapped as furbearers under this regulation. If adopted implementation of the new regulation should be delayed until the 2012-13 regulatory year or until the Board has had the opportunity to review the remaining regulations associated with black bear trapping.

PROPOSAL 107

EFFECT OF THE PROPOSAL: Clarify and modify guided black bear baiting requirements in Region IV.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: There has been a desire by some guides for some time now to allow for clients hunting black bear over bait to remain and hunt at the bait station without the requirement for guides to be physically present at all times. While general black bear hunting with a guide is not a requirement for non-residents, the current law (5 AAC 92.044(b)(6)) requires the guide to *personally accompany* the client at the bait station. This is a more restrictive requirement than allowed in the Guide Regulations (AS 08.54.610(e)); a contracted registered guide-outfitter must be physically present with the client in the field at least once during the hunt, and must remain in the field and *participate in the contracted hunt* unless it is being conducted by a Class-A assistant or another registered guide-outfitter working for the contracting guide.

Several years ago the Board passed more restrictive requirements for guides hunting with clients using bait for black bears. Because there was concern at the time for the future of black bear baiting, the Board passed regulations that required guides or assistant guides to accompany (remain) with the clients at the bait site. This was likely done in order to facilitate the guide or assistant guide with assisting the client in determining species, size, and sex of the bear (s) observed at the bait site.

The Department recognizes that there are other considerations for registered guides and their clients hunting black bears over bait. If this proposal is considered for adoption, the Department would recommend that guides still be responsible for establishing, maintaining, and cleaning-up bait stations while allowing clients to remain at the bait sites to hunt while the guide or his/her assistant is not present. The Department would also recommend that the guide or assistant guide must accompany the client to the bait station.

PROPOSAL 108

EFFECT OF THE PROPOSAL: Establish a regional bag limit of 5 bears per year while still limiting the hunter’s harvest within each Game Management Unit to the Unit specific bag limit.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: No conservation concerns have been identified for black bears in Region IV. However there are subunits such as 14A where hunter access and interest in black bear hunting is high enough that the Board reduced the black bear bag limit to 1 bear to limit harvests. Establishing a regional bag limit would allow additional take of bears within individual Game Management Units. The proposed regulation would likely shift harvest distribution to easily accessible areas and may result in a slight increase in the overall harvest.

Unit-specific bag limits are based on the wildlife population size, its sustained yield, and the anticipated hunter effort in the area. Lower bag limits are adopted in specific areas to limit overall harvest. More liberal bag limits are established in areas with higher populations, fewer hunters, and less access. Areas with more liberal bag limits are also designed to attract hunters to an area with more game available for harvest.

Many times a low bag limit indicates that there are too many hunters using the area, probably due to proximity to large human populations. If the bag limit is no longer unit-specific, an overharvest would most likely occur in the areas near that human population. If adopted the Department recommends amending the proposal so the liberalization does not apply to Unit 14A. In addition, changes would be necessary to the language in 5 AAC 92.130, which defines the relationship between unit and statewide bag limits.

PROPOSAL 109

EFFECT OF THE PROPOSAL: Remove the brown bear tag fee waiver for certain lands in Units 11, 13, and 16B.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the Board’s decision on Proposal 110.

The brown bear tag fee exemption is a management tool applied to specific game management units because of known calf predation. There is no biological reason at this time to remove the brown bear tag fee exemption in Units 11, 13, and 16B. Current population estimates and related research conducted in Units 13 and 16B indicate that brown bears are an effective predator and currently present in healthy numbers. The Copper Basin Fish and Game Advisory Committee and the Wrangell-St. Alias Subsistence Resource Commission have consistently supported tag-fee exemption in Units 11 and 13.

Despite current hunting pressure on the brown bear populations, units 13 and 16B maintain a high and stable harvest of brown bears and there is no indication that there has been a negative

impact on the bear population. For these reasons and the Department's continuing effort to recover the moose population in these units as required under the Intensive Management Law, there is no reason to eliminate the tag fee exemption in any portions of 11, 13, or 16B.

PROPOSAL 110

EFFECT OF THE PROPOSAL: Reauthorize the brown bear tag fee exemption for Units 9, 11, 13, 16 and 17.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Department proposal – see Issues statement.

PROPOSAL 111

EFFECT OF THE PROPOSAL: Change the bag limit for coyotes in all Region IV Units from 10 per day to no limit.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the Board's recommendation on proposal 112

PROPOSAL 112

EFFECT OF THE PROPOSAL: Change the hunting season, bag limit, and harvest requirements for coyotes in all Region IV Units. Coyotes would have no bag limit and no closed season. Salvage requirements would be to salvage the skull only unless it has been destroyed in the taking.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: There are no biological concerns regarding this proposal. Currently, other regions and Game Management Units across the state have various seasons and bag limits. At the Region III Board of Game meeting in Fairbanks last March, hunting regulations were passed that allow for no bag limit and an August 10 to May 25 season on coyotes in most of Region III. There is support from the Department to simplify and align coyote seasons and bag limits across the state where appropriate.

PROPOSAL 113

EFFECT OF THE PROPOSAL: Change the season for coyotes in Units 13 and 14 to no closed season.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Based on the Board's recommendation on proposal 112

PROPOSAL 114

EFFECT OF THE PROPOSAL: This proposal establishes a registration permit hunt for brown bear in Units 9 and 10, and liberalizes the brown bear season and bag limit for residents near communities to harvest problem bears in a timely manner.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: Department proposal – see issue statement. Amend to remove resident bear tag and tag fees for the proposed registration brown bear hunt near communities.

PROPOSAL 115

EFFECT OF THE PROPOSAL: Change the Dall Sheep hunts for all Region IV Units. Bag limit would be full-curl ram only. All permit hunts would be reduced by 1/3. All sheep permit drawings with fewer than 10 available permits (by permit number, not in aggregate) would be resident only with the exception of the “Governor’s Tag” in order to give that tag more value.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The Department desires to continue with the current management strategy to rebuild the older cohort portion of the ram segment of the Chugach sheep population. The current limited drawing permit any-ram management strategy will allow for improved survival of older rams (greater than 7 years of age) and still provide opportunity. A closely regulated permit hunt will allow managers to more closely monitor harvest and adjust permit levels as the ram component of the population improves with a more desirable distribution of age classes.

The non-resident permit numbers were established by the Board of Game based on historic use participation patterns and are allocated accordingly in the number of drawing permits that are issued. The non-resident allocation can only be adjusted based on changes to the overall permit numbers unless the Board amends the regulation to adjust the allocation.

The Chugach sheep permit (“Governor’s Tag”) that has been offered for auction through conservation groups and others was recently modified to include all of the 14A drawing permit hunt areas as additional area available to the hunt purchaser. The intent was to enhance the auction value of the permit in order to increase bids and generate more revenue for the Department’s sheep and other management programs.

PROPOSAL 116

EFFECT OF THE PROPOSAL: Change the horn restriction for Dall sheep in Units 13D and 14A. All sheep drawing permits would be issued under the current general harvest full-curl regulation.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The any-ram bag limit is a specific management strategy applied to the Chugach sheep population as an experiment to stabilize and increase the number of rams in the population. Because the population is still in the recovery phase, the Department intends to continue with the any-ram bag limit for a long enough time period to determine the efficacy of the strategy. We are monitoring the sheep population in these units to identify an increase in ram numbers or otherwise demonstrate sufficient recovery in the population overall.

The intent of the any-ram bag limit for drawing hunts in Units 13D and 14A was to allow for sheep hunting opportunity without putting all the hunting pressure on a very limited number of full-curl rams. Full-curl harvest strategies focus all harvest pressure on the older mature rams, the very segment of the ram population in these units that has been subject to the most hunting pressure and observed to be very limited in availability. The proposer has suggested that drawing permits are limited due to the any-ram bag limit when actually the opposite is true. Given the very limited number of full-curl rams present in the populations at this time, staffs have intentionally directed hunter effort to most of the ram age classes. This would possibly allow for a little more survival of the older age class rams (8+) and allow full-curl rams of 6 and 7 years of age a better opportunity to survive and breed for additional seasons to enhance the population's genetic potential.

PROPOSAL 117

EFFECT OF THE PROPOSAL: Establish late season archery registration hunts in all sheep drawing areas in Region IV. Seasons would be September 7 – October 10 for full-curl rams only. Up to two rams may be taken by non-residents in each of three units: 13D East, 13D West, and 14A south of the Matanuska River.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is an allocation issue. If there is adequate justification to allow an archery hunt for sheep overlapping with the latter half of the existing August 10 – September 20 season, it would likely be due to the fact that the Department could offer late-season archery permits based on traditionally very low bowhunter success rates. It is highly likely there will be no biological impact on the sheep populations in these units given the difficult and extremely challenging nature of a late-season archery hunt for full-curl rams. Effort and harvest rates in Unit 14C have shown very little harvest for the amount of effort that has been reported and very few rams are taken and that hunt is open for any sheep including any ram.

The value of offering this hunt would be to have more opportunity available to hunters with very little impact if any, to the sheep population. This is especially true considering the lower than expected participation rates we have observed for the last three years in the 13D and 14A sheep drawing permit hunts. The counter argument to this point of view would be that any impact at all is less than desirable given the wishes of the Board to increase mature ram numbers in these units.

PROPOSAL 118

EFFECT OF THE PROPOSAL: Require guide-client agreements for goat hunts in Units 13D, 14A, and 14C.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: This would be consistent with existing guide-client agreement requirements in other units and for other species. There is reasonable justification for adopting this regulation to mirror the Unit 13D, 14A, and 14C sheep drawing permit regulations regarding guide-client agreements.

PROPOSAL 119

EFFECT OF THE PROPOSAL: Implement a predator control program for the range of the Mulchatna Caribou Herd

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: The Board of Game has received numerous proposals in the past to address predation on Mulchatna caribou. Based on the age structure in the herd, reproductive performance, difficulty in conducting a predation control program for the entire range of the herd, and lack of knowledge of the effect of predation on this herd, the Department has been reluctant to support a predator control program for Mulchatna caribou. With the herd age structure rebounding from the result of rapid herd growth in the 1990s, productivity appearing to have increased in the younger aged caribou, and recent successes in predation control programs elsewhere which were limited to specific times and area, the Department feels it is time to consider a predator control program to benefit Mulchatna caribou. While actual harvest rates are not known, reported harvest remains well below Intensive Management harvest objectives and hunting opportunity remains reduced through shortened seasons and bag limits.

However, as written, this proposal cannot be adopted. The range of the Mulchatna herd encompasses area in Regions 3 and 5, neither of which were up for consideration in this Call for Proposals. The Department recommends the proposal be amended to include only those areas of the Mulchatna Caribou Herd's range within Units 9 and 17. Because the Mulchatna herd ranges across multiple regions, requiring that this issue be addressed during different BOG cycles, the Department recommends amending and adopting this proposal at this time and then addressing areas outside Region IV in cycle at the appropriate Board meetings next year. This will allow implementation as early as next autumn/winter in Unit 17, and shortly after in other GMUs.

Implementation of this program would be contingent on a feasibility study. During spring 2011, the Department will be undertaking a project to determine the causes, timing and distribution of calf mortality. This information will be used to determine the feasibility of intensive management and allow the Department to design an effective strategy.

PROPOSAL 120

EFFECT OF THE PROPOSAL: Modify the management objective for the Mulchatna Caribou Herd.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: An intensive Management population objective of 100,000 to 150,000 for the Mulchatna Caribou Herd was established in 2001 when the estimated herd size was 160,000 to 180,000 caribou. Herd size has declined dramatically since then. Surveys since 2001 suggest the large size attained by this herd (estimated at 200,000 caribou in 1996) likely contributed to conditions leading to reduced productivity and survival. In 2009, the BOG changed the population objective to 30,000 to 80,000. The lower population objectives allow harvesting at high rates when the herd is experiencing rapid growth regardless of population size relative to objectives. Harvest can still be managed to accommodate herd growth if desired. This harvest may otherwise be lost if managers fail to harvest from a growing population and the population declines before the population objectives are reached. This strategy allows managers to slow growth, optimize harvests, and evaluate nutrition and range status to prevent the herd from overshooting range capacity. Harvest objectives set at desired levels will still trigger Intensive Management programs when the harvest is not being met even when the population is above the lower objective.

PROPOSAL 121

EFFECT OF THE PROPOSAL: Allow aerial shooting of wolves in GMUs 9 and 17.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Alaska Statute 16.05.783 as well as the federal Airborne Hunting Art prohibits aerial shooting outside of an existing predator control plan.

PROPOSAL 122

EFFECT OF THE PROPOSAL: This proposal would retain, repeal, or modify discretionary hunt conditions and procedures applied by the Department to permit hunts in the Central/Southwest Region, Units 9, 10, 11, 13, 14A, 14B, 16 and 17.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is a Board of Game proposal. The Department will review all discretionary permit conditions for permit hunts in Units 9 – 11, 13, 14A, 14B, 16 and 17. Permit conditions can be found at <http://www.boards.adfg.state.ak.us/gameinfo/meetinfo/gcal.php>.

PROPOSAL 192 (Regions II and IV)

EFFECT OF THE PROPOSAL: Restrict trapping near trails and roads in all Region II and Region IV Units.

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DEPARTMENT RECOMMENDATION: **Do Not Adopt**.

RATIONALE: Similar proposals have been submitted at most Region II meetings for the past 10+ years. The board has carefully considered them and chosen to adjust trapping restrictions in specific instances.

A blanket restriction is not necessary at this time. Additionally, enforcement of “buffers” have always been difficult.

PROPOSAL 193 (Regions II and IV)

EFFECT OF THE PROPOSAL: This proposal would reduce the daily bag limit for goldeneye ducks (Barrow’s and Common goldeneyes) from 7, 8 or 10 per day to 2 per day, and reduce the possession limit from 21, 24, or 30 to 6 in Region II (Units 6, 7, 8, 14C, and 15), and Region IV (Units 9, 10, 14A, 14B, and 16). This proposal also lists several suggestions that include: 1) moving goldeneyes from the general duck bag limit to the sea duck bag limit (assume requesting same bag/possession reduction); 2) form a Board of Birds (BOB) to advise the BOG on waterfowl regulations;); 3) establish separate waterfowl regulations for hunters using waterfowl guide services (bag limits are not specified); and 4) At minimum for this proposal consider addressing regulatory changes for only the Gulf Coast Zone (Units 6, 7, 9, 10 (Unimak Is. only), 14, and 16) or Kachemak Bay (Unit 14C in part).

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

Maintain current bag and possession limits for all Unit’s. In addition we recommend the following: 1) Keep goldeneyes in the general duck limit and 2) Do not enact separate regulations for hunters using the services of waterfowl guides.

RATIONALE: Sport harvest statewide for goldeneyes is relatively low averaging 1-5 thousand birds per year. A long-term change in goldeneye abundance statewide has not been detected. Additionally, evidence for specific areas within the Gulf Coast (e. g. Kachemak Bay, Prince William Sound, and Kodiak) suggests no significant change in goldeneye abundance. Harvest restrictions will not provide conservation benefits to the goldeneye population. While taxonomically classified as sea ducks, under the Federal Waterfowl Regulatory Framework goldeneyes are not considered sea ducks due to behavioral differences and are included in the general duck bag and possession limits.

Ornithologists are welcome to provide input to the BOG and we would encourage them to participate in the BOG process. Few commercial guides in AK specialize in waterfowl hunting. Consequently, we do not believe that their harvest contributes substantially to the overall waterfowl harvest in the state, or has it resulted in local depletion.

PROPOSAL 194 (Regions II and IV)

EFFECT OF THE PROPOSAL: This proposal would create separate waterfowl regulations for waterfowl guides and their clients in Region II (Units 6, 7, 8, 14C, and 15), and Region IV (Units

9, 10, 11, 13, 14A, 14B, 16 and 17) when there is a conflict with users of the resource, declining species abundance, or localized depletions.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: This has been discussed in Proposal 193.

The number of hunting guides in AK specializing in waterfowl hunting is small. Consequently, we do not believe that their harvest contributes substantially to the overall waterfowl harvest in the state, or has it resulted in local depletion. A large proportion of clients utilizing waterfowl guides are non-resident, therefore they already have more restrictive regulations than resident sport hunters. The Department frames management efforts primarily at the population level, with consideration of status and trends of resources within regions. The Department has no practical way to monitor ducks or rational for controlling harvest at the spatial scale suggested by the proposal.

PROPOSAL 195 (Region IV)

EFFECT OF THE PROPOSAL: Modify the salvage requirements for black bear for Regions II and IV

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: This proposal as written would allow for hunters taking black bears for meat to not have to also salvage the hide from June 30 until December 31. The current regulation referred to in the proposal (from Region III) is actually from June 1 until December 31.

For Region IV, the Department supports adopting the proposal as long as the proposal is amended so the dates reflect the current meat salvage of Jan. 1 – May 31. Also, the Department wants to retain hide salvage requirement in addition to the skull where there is a need to continue sealing of black bear in order to collect additional biological information for monitoring the harvest and evaluating predation management. The two units where sealing would still be required would be in Unit 14A and Unit 16.

PROPOSAL 196 (Region IV)

EFFECT OF THE PROPOSAL: Eliminate black bear sealing requirements where harvest tickets or registration permits are required and provide necessary harvest data.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: The Department supports eliminating the sealing requirement in Units 9, 11, 13, and 14B.. Considering the related changes that the Board made to the Region III black bear sealing requirements last March, there is a desire by some to establish consistent regulations across the state. This proposal addresses that issue, however there are a variety of black bear

management strategies in place across Region IV. This proposal as written would include Unit 16, where Black Bear predation management is currently taking place and Unit 14A, where there are reasons to closely monitor general harvest effort and bear take. In addition, in Unit 17, the Department wants to retain sealing in lieu of bear harvest tickets. Harvest tickets are less desirable in that unit and sealing provides the necessary data on local black bear populations. The units that the Department identifies as warranting continued monitoring (sealing) include 14A and 16. See proposal 24 for discussion concerning retention of sealing in Unit 17.

PROPOSAL 197 (Region IV)

EFFECT OF THE PROPOSAL: Allow same-day-airborne hunting of black bear at bait stations in Region IV.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: Take no action based on actions taken on Proposal 105.

PROPOSAL 198 (Region IV)

EFFECT OF THE PROPOSAL: Change the bag limit for coyotes in Regions II and IV to “unlimited”

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: See recommendations in Proposal 112.

PROPOSAL 199 (Regions II and IV)

EFFECT OF THE PROPOSAL: Requests that the Board consider several regulation changes to encourage hunters to better salvage meat from big game.

DEPARTMENT RECOMMENDATION: **Take No Action**

RATIONALE: The author of this proposal suggests many ways to improve the salvage of meat from animals taken by hunters. In some cases these suggestions are for changes to the Department’s Hunter Education program while others are for strengthening salvage regulations.

The Department has invested considerable time and funding to develop hunter education programs that teach responsible hunting methods. Meat salvage is an important component of this program already. Excellent examples from these programs are the meat care video produced in 1999 and the hunt Alaska booklet which is provided to many nonresident hunters when they request information about hunting in this state and all basic Hunter education students. In addition the regulation booklet now has two full pages on meat care and salvage information.

The Department supports the concept of this proposal but does not see any recommendations that could be practically implemented or aren’t already in place. Additionally, in addition to 5AAC

92.220, Alaska Statute 16.30.010 (Wanton Waste of big game animals and wild fowl) carries one of the harshest penalties for existing wildlife violations.

PROPOSAL 200 (Regions II and IV)

EFFECT OF THE PROPOSAL: This proposal would make it illegal for hunters to take game the same day they were transported to the field by commercial transporters.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This is already illegal for airplane based transporters.

“ 5 AAC 92.085 (8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00am following the day in which the flying occurred;...”

However the proposal goes beyond that to include other methods of transportation with the largest group being boat based transporters. This will eliminate the operators who provide “day trips” into the field through boat, four wheeler, snow machine or even street vehicle. Functionally it is unclear how this would work for boat based hunting where the hunters live on board either.

Since this proposal would effectively alter the allocation of resources to different users the Department has no recommendation.

PROPOSAL 201 (Regions II and IV)

EFFECT OF THE PROPOSAL: This proposal would extend the prohibition for the taking of big game until 3:00 PM the day following the day a hunter flew but only with a commercial transporter. In addition this proposal adds other methods of commercial transportation to the prohibition.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: Currently the regulation prohibits the take until 3:00 AM. While the proposed change will address the proponents concerns of hunters spotting game the evening before and pursuing the same animals the very next day it would also unnecessarily restrict some hunters opportunities to fly in hunt by almost a day.

“ 5 AAC 92.085 (8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00am following the day in which the flying occurred;...”

This will eliminate the operators who provide “day trips” into the field through boat, four-wheeler, snow machine or even street vehicle. Functionally it is unclear how this would work for boat based hunting where the hunters live on board either.

PROPOSAL 202

EFFECT OF THE PROPOSAL: Reauthorize resident brown bear tag fee exemptions in Units 12, 19, 20, 21, 24, 25, 26B and 26C.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 203

EFFECT OF THE PROPOSAL: Reauthorize antlerless moose hunting seasons in Unit 19(D), 20(A), 20(B), and 20(D).

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 204

EFFECT OF THE PROPOSAL: Establish a community subsistence harvest hunt for the Village of Minto.

DEPARTMENT RECOMMENDATION: **Defer to March 2012**

RATIONALE: The Copper Basin community subsistence harvest hunt in Unit 13 was modified after a Superior Court decision in July 2010. The board will be reviewing community subsistence harvest hunts during the Region IV meeting in Wasilla in March 2011. The board has stated that no further community subsistence harvest hunts should be established at this time.

Note: This proposal was deferred by the Board of Game from the spring 2010 meeting. It was previously listed as Proposal 44 (not proposal 46, as stated in the spring 2011 proposal book)

PROPOSAL 205

EFFECT OF THE PROPOSAL: This proposal would change and clarify the boundary between Units 18, 19, and 21. The proposal statement of purpose in the published proposal mistakenly refers to Game Management Unit 20 instead of Unit 21.

DEPARTMENT RECOMMENDATION: **Under Consideration**

RATIONALE: The Department is assisting the Central Kuskokwim and Lower Kuskokwim Advisory Committees in developing an amendment to this proposal. We fully support the efforts of these Advisory Committees to propose an equitable and identifiable boundary.

As stated in the proposal, the current boundary between these game management units is imprecise. The boundaries in the Kalskag area are particularly ambiguous with 1) no definition of precisely where the "straight line drawn between Lower Kalskag and Paimiut" begins and

ends and 2) the large slough of the Kuskokwim River locally known as "Old River" makes determining what is downstream of Kalskag problematic.

PROPOSAL 206

EFFECT OF THE PROPOSAL: Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 207

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose seasons in Unit 18.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 208

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose seasons in Unit 22C and the remainder of Unit 22D.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 209

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose seasons in Unit 23.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 210

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in Unit 26A.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 211

EFFECT OF THE PROPOSAL: Reauthorize the existing antlerless moose season in Unit 1C, Berners Bay.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement. No permits were issued in 2010 due to continued low moose numbers following a series of severe winters. An aerial survey conducted in December 2010 detected 73 total moose, including 10 calves. Based on sightability data from collar moose, the Berners Bay moose population is estimated to be near 88 animals.

Review of historical survey data suggests that this moose herd is able to increase in number after difficult winters. Several positive signs collected through research efforts include a higher adult survival rate during the past few years and good pregnancy rates and body condition, suggesting that the Berners Bay herd has the potential to grow.

It is unlikely that an antlerless hunt will occur in the next few years but the existing hunt should be maintained so this tool is available once the population level is such that additional herd growth could be detrimental to the habitat.

PROPOSAL 212

EFFECT OF THE PROPOSAL: Reauthorize the existing antlerless moose season in Unit 1C, Gustavus area.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement. The goal of the Gustavus antlerless moose hunts was to reduce the number of moose on the winter range to ensure the available habitat is adequate to support the animals utilizing it. During 2004 through 2009 population estimates at Gustavus indicated the moose numbers were reduced from a high of approximately 550 animals to the 2010 estimate of approximately 252 moose.

During this same period of time, browse surveys indicated improving winter range conditions based on decreasing browsing intensity on willows. Subsequently the body condition indices based on rump fat measurements increased, and pregnancy, twinning, and fecundity also increased. Based on these data, the antlerless hunts were successful, and had their desired effect of lowering moose density while increasing moose body condition and reproductive indices.

No antlerless moose hunting permits were issued for the Gustavus area in 2010, and none are planned for 2011. It is unlikely that an antlerless hunt will occur in the near future, but the existing hunt should be maintained so this tool is available if the population again reaches levels that we believe are beyond what the habitat can support.

PROPOSAL 213

EFFECT OF THE PROPOSAL: Reauthorize the existing antlerless moose season in Unit 5A, Nunatak Bench.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Staff proposal, see issue statement.

PROPOSAL 214

EFFECT OF THE PROPOSAL: Establish a statewide requirement for second-degree-kindred relatives taking nonresidents on certain big game hunts.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: Current guiding requirements allow any nonresident hunting sheep, goat or brown bear to forgo hiring a guide if they are accompanied by a second-degree-kindred relative who is a resident of the state. This proposal would require that resident relative to possess a valid hunting license. It would also define personally accompany to clarify how much responsibility the relative should have while actually in the field.

PROPOSAL 215

EFFECT OF THE PROPOSAL: Establish a bonus system for specific drawing hunts.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: This proposal was developed by the Board of Game during the March 2009 board meeting and was submitted for review at the request of the Board of Game. This board proposal will create a system for some drawing hunts whereby a hunter who pays careful attention to the application rules will increase his or her chances of being drawn in subsequent years when he or she accumulates more points (chances). How much a hunter's probability of being drawn in a subsequent year will increase will depend on: (1) the number of applicants, (2) the number of bonus points he or she has, and (3) the established rules.

The Department has no recommendation because these systems and the way they could be implemented represent a myriad of allocation decisions. A number of state fish and game agencies in the U. S. have preference or bonus point systems for allocating hunting opportunities that vary from moose in Maine to bighorn sheep in many western states. The degree to which the hunting public likes or dislikes these systems varies. Most are expensive and administratively complicated to maintain. All have fees to maintain the respective program apart from other license and tag fees that support wildlife management programs.

The Department is neutral on the many allocation decisions associated with implementation of this system. The Department remains concerned about the cost to implement and maintain a bonus point system. Whether the Board adopts bonus points for a few or many hunts is largely irrelevant to the computer programming work necessary to implement the system. However, if

pursued, the Department would prefer starting small, with a few hunts, so that inevitable “bugs” in a new system can be more easily and efficiently identified and addressed.

State fish and game agencies that have bonus or preference point systems charge additional fees to maintain these systems, with any additional funds being used for big game management and conservation. The Department is unable to subsidize development and maintenance of this system by taking away hunter dollars from other game management programs. Testimony from proponents of bonus points (avid Alaskan hunters) has consistently indicated a willingness to pay a modest increase in application fees to offset the cost of this system. This will require legislation allowing the Department to recoup the cost to operate a bonus point system, at which time the Department would institute the bonus point system.

PROPOSAL 222

EFFECT OF THE PROPOSAL: Review the antler destruction requirement for proxy hunts.

DEPARTMENT RECOMMENDATION: **Do Not Adopt**

RATIONALE: The proxy program was established in statute in 1992, and regulations were adopted by the Board of Game in 1993. The program was established to allow people no longer capable of hunting for food, due to age or injury, to assign their bag limit to another hunter, allowing them to hunt and obtain food for them.

In response to complaints concerning the number of proxy hunters, the Department submitted a proposal on behalf of the Board for the January 2006 statewide meeting. During that meeting the Board adopted language prohibiting proxy hunting except in specific caribou, deer and moose hunts. The proposal was reprinted as amended for the March 2006 Board meeting, where it was further amended to require that animals taken by proxy hunters have the trophy value destroyed. The number of proxy hunters has declined since that action was taken. Revoking the regulation would probably result in an increased number of proxy hunters once again.

Over the years, the number of proxy authorizations issued had increased dramatically and some publics’ felt the program was being abused and no longer meeting the intent of the regulations. In many areas of the state where hunting had been restricted for a variety of reasons, the proxy authorization was being used as a chance at additional opportunity. This may have allowed the restriction on bag limits to be circumvented.

The end result was an essentially increasing number of hunters in the field. The actual number of hunters may have been static, but many of those hunters had two bag limits, and more of the total harvest was going to fewer hunters. This became an allocation issue directly related to fairness and equal opportunity for hunters.

In cases where the Board has restricted seasons and bag limits due to conservation concerns, proxy hunters were circumventing those restrictions. The adopted proposal limited proxy hunting to areas where the Board has fewer conservation concerns. Proxy hunting is limited to areas

where there is already a multiple bag limit for deer and caribou. Moose is limited to a bag limit of one statewide, so proxy hunting for moose is allowed only for cow hunts or any-bull hunts.

PROPOSAL 223

EFFECT OF THE PROPOSAL: Review the discretionary authority requiring the nullification of trophy value of animals taken under a subsistence permit.

DEPARTMENT RECOMMENDATION: **No Recommendation**

RATIONALE: The board has asked the department to review its use of trophy destruction as a management tool for specific hunts. Trophy destruction is currently used in units 21D and 16B for moose, in units 22B, 22C, 22D, 22E, and 23 for muskoxen, and in units 18, 22A, 22B, 22C, 23, and 26A for brown bears.

These hunts occur on game populations that have both customary and traditional subsistence uses and high trophy values. When harvestable surpluses in such populations are small, hunters primarily interested in trophies are highly motivated to participate in subsistence hunts because of the more liberal seasons and bag limits and lower costs associated with subsistence hunts. As an example, in 2010 the chance of winning a Seward Peninsula muskox drawing permit was no more than 5%, and the fee for successful applicants was \$500. At the same time, the chance of obtaining a Tier I subsistence registration permit was 100%, and it was free. In such situations, absent a substantial barrier to trophy use, a rational hunter will always choose a subsistence hunt. This increases apparent subsistence effort and competition, reduces opportunity for recognized subsistence uses, and ultimately increases the *apparent* amount necessary for subsistence.

In state law, subsistence uses of wild renewable resources are defined as:

...the noncommercial, customary and traditional uses of wild, renewable resources by a resident ... for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making and selling of handicraft articles out of non-edible by-products of fish and wildlife resources taken for personal or family consumption, and for the customary trade, barter, or sharing for personal or family consumption... AS 16.05.940

State law does not recognize trophy use as a subsistence use, but neither does it preclude the taking of trophy animals in subsistence hunts. Trophy disposition is left to the discretion of the board and the department. The Joint Boards of Fisheries and Game did not include trophy use among the eight factors to identify game populations used for customary and traditional subsistence (5 AAC 99.010).

This does not mean that subsistence hunters do not value trophies. This simply means that trophy hunting is not a factor to be considered in providing for subsistence uses, nor in identifying game populations customarily and traditionally used for subsistence, nor in determining amounts necessary for subsistence.

To maintain the integrity of certain hunts on subsistence game populations with high trophy values, the department must attempt to determine whether a hunter's true interest is one of the recognized subsistence uses. The most effective approach is to require hunters to surrender trophies to the state, removing any trophy incentive completely. Other approaches are less effective:

- Limiting access to permits through local distribution is not effective. Hunters must travel to the hunt area anyway.
- Making permits available at a time other than the hunting season is not effective. It imposes no cost on local hunters, nonlocal contractors with jobs in the hunt area, and airline employees. Other nonlocal hunters must pay for an additional airline ticket. Again, for muskox, this is usually less than the \$500 tag fee.
- Requiring hunters to transport meat to their primary residence is not effective. It imposes little cost on local hunters. For nonlocal hunters in hunts off the road system, it imposes freight charges. In the case of muskox, freight charges may be less than the \$500 tag fee.
- Limiting seasons and bag limits in a subsistence hunt to accommodate additional demand from trophy hunting unfairly reduces subsistence opportunity for all other hunters, who are hunting for recognized subsistence uses.

Because these other approaches impose a modest cost, or no cost at all, on hunters seeking trophies, rational hunters will chose to hunt in subsistence hunts regardless of their purpose for hunting. These other approaches essentially manage nonsubsistence demand for trophies created by a failure to determine hunters' true interests. In high-value trophy situations, the prudent approach is to destroy trophies in subsistence hunts, and to accommodate trophy uses in separate hunts.

The department recognizes that some individuals find trophy destruction offensive. Nonetheless, it is the most effective way to ensure that subsistence hunts are not subverted into trophy hunts and to provide the greatest amount of opportunity for the largest possible pool of users across the state.

The department will provide background on the hunt management history that led to the current regulations and discuss management options.

PROPOSAL 231

EFFECT OF THE PROPOSAL: Establish an antlerless drawing permit moose hunt for Unit 13.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: This is a Department proposal. See Issue Statement.

PROPOSAL 232

EFFECT OF THE PROPOSAL: Allow motorized vehicle access in the Yanert Controlled Use Area in Unit 20A during October through July.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: This proposal would help achieve moose population objectives in Unit 20A. The department is striving to harvest more moose in Unit 20A to regulate the population and to meet IM harvest objectives. In addition, the department strives to spread the harvest spatially and temporally to reduce localized overharvest and social conflicts. Allowing motorized access in the Yanert CUA beginning October 1 would accomplish this. If motorized restrictions are lifted this area would also be a good place to hold the November antlered muzzleloader hunt. This hunt must be moved from its current location in the eastern portion of the Wood River CUA because of social conflicts.

PROPOSAL 233

EFFECT OF THE PROPOSAL: Extend the hunting season for moose in Unit 20B.

DEPARTMENT RECOMMENDATION: **Amend and Adopt**

RATIONALE: The department recommends amending this proposal to specify extending the bull moose season to September 20 in the remainder of Unit 20B. Extending the season would align seasons in most of Unit 20B and provide additional hunting opportunity. Both the department and the proposer are looking for ways to increase harvest to regulate the population and meet IM harvest objectives. Harvest is currently below Intensive Management (IM) objectives and additional bull harvest is warranted. The IM harvest objective is 600–1,500 moose and harvest typically ranges 600–900. The moose population in Unit 20B is estimated at approximately 20,000 moose, well above the IM population objective of 12,000–15,000. In addition, lengthening the general season in the remainder of Unit 20B to September 20 may reduce hunting pressure for bulls in adjacent Unit 20A where the season runs through 25 September and there are many social issues resulting from high hunter densities. However, extending the Unit 20B season to September 25 is likely to result in excessive bull harvest, lowering bull:cow ratios to undesirable levels.
