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PC01
1 of 4

Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

March 5, 2021

ADF&G Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, Alaska 99811-5526

To members of the Alaska Board of Game:

Ahtna, Incorporated ("Ahtna") is hereby submitting written comments on Statewide Proposal 6 – Brown Bear Tag Fee Exemption, Proposal 58 – Re-Authorization of Antlerless Moose Hunt in GMU 13, and Proposal 183 – Re-Authorization of Antlerless Moose Hunt in GMU 20A.

Proposal 6

Ahtna supports Proposal 6 to reauthorize the brown bear tag fee exemptions in GMU 11 and GMU 13. Brown bears are in abundance, and there is not a conservation concern.

Brown bears prey upon calves of moose and caribou. Hunters should be allowed to hunt brown bears without having to pay a \$25 brown bear tag fee. Based upon ADF&G brown bear population studies within GMU 13A (Brockman *et. al.* 2020. *Effect of Harvest on a Brown Bear Population in Alaska*), there appears to be no ADF&G resource concern regarding the low abundance of brown bears. Ahtna's own non-invasive hair snaring efforts in partnership with ADF&G have found that there is a healthy brown bear population within GMU 13.

Based on past abundance studies, ADF&G estimated that Ahtna would find one brown bear in our first year (2018) of sampling our study area (30 mi²). That estimate was inaccurate; Ahtna found 22 individual brown bears in the study area using DNA from hair samples. This suggests a higher population abundance than originally estimated. ADF&G's goal of reducing brown bear abundance by 50% to help with moose calf survival has not been met to our knowledge.

The tag fee exemption will enable the incidental harvest of brown bears while in pursuit of ungulates in GMU 13, where there is currently a resource concern regarding moose. Incidental harvests of brown bears are a key tool in the population management and conservation in GMU 13 and GMU 11. Removing the tag fee will help with the harvest of brown bears.



Proposal 58

Ahtna does not support Proposal 58 to allow antlerless moose permit hunting in GMU 13A.

Proposal 58 would authorize a general hunt open to all Alaska residents for one antlerless moose in GMU 13A. Up to 200 permits would be issued by ADF&G through a draw. The season would be 10/1-10/31 and 3/1-3/31.

This hunt is not necessary. Cow moose may be impregnated and incidentally killed or wounded by hunters. We do not consider moose to be over-populated in GMU 13A. Moose population shouldn't be managed by human intervention. If moose do not have forage, they will move to other areas to feed themselves.

Currently GMU 13A is part of 5 AAC 92.121: Intensive Management Plan V. The goal of the Intensive Management Plan is to increase moose numbers through the means of predator control. This may be implemented when there is a resource concern regarding a low moose population in GMU 13A. We do not believe that the authorization of an antlerless moose hunt is the best management strategy for regulating the moose population in GMU 13A when there is a resource concern.

The stated concern is that moose in GMU 13A are reaching carrying capacity and becoming nutritionally stressed. Based on publicly available ADF&G data, there appears to be little vegetation work done in GMU 13A to understand how many moose the landscape can carry. The lack of habitat information, mixed with inconsistent aerial surveys due to snow conditions or budget constraints, leads us to believe that the current carrying capacity is an estimate based on older data. Further research should be done regarding vegetation/habitat and moose populations before an antlerless hunt is reauthorized.

In addition, allowing hunters to harvest antlerless moose during the gestation period may have a larger effect on the moose population than anticipated when other mortality factors, such as predation and winter kill, can vary year to year. We have seen this with the Nelchina caribou herd. Harvesting more caribou and encouraging shooting cows when there was believed to be an abundance, coupled with unforeseen factors such as predation and a harsh winter, caused the population to decline to an unfavorable level and restricted hunting activity the following season. We understand that if the moose population reaches carrying capacity it can lead to nutritional stress, population die-out and reduced antler growth. However, reducing the moose population would lead to more forage availability which could result in more antler growth and more harvestable bull moose from the existing population.

Further, not all moose will increase antler growth when forage is increased. Some bulls simply do not have the genetic structure to produce larger antlers; thus a population reduction is not a



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guarantee for larger bulls. A population reduction in the form of harvesting cows will lead to a population decline that will lead to fewer moose on the landscape. This will lead to fewer harvestable bull moose in the long term. If the concern is nutritional stress, this Board should allow the natural process such as predation to control the population.

There are other alternatives to reduce the moose population to meet the carrying capacity needs. This may include restructuring the antler requirements or issuing more community harvest moose tags. We believe this would satisfy the hunter harvest issue as well as the (speculated) over-abundance issue.

Another concept that should be addressed to help the population instead of an antlerless hunt is to implement improvement projects to create more habitat to support a larger healthy moose population. This will increase the hunter harvest to reach your harvest objectives. If the antlerless hunt is intended to help meet harvest objectives, it is less a resource concern and more of a hunter success concern, which should be addressed in a different manner.

We are concerned that what is happening in GMU 20B will occur in GMU 13A. In GMU 20B, an antlerless moose hunt is allowed. Hunters from Fairbanks and other communities hunt for moose in GMU 20B. They have depleted the moose population close to Minto Village and moose that could have been harvested in accessible areas along highways. There is already great difficulty in harvesting moose for a funerary potlach. The Minto Village tribal members are directly impacted by the antlerless moose hunts in their areas.

Further, an antlerless moose hunt encourages hunters to take advantage and create crowded hunting conditions. This directly impacts tribal members who are not harvesting moose due to crowding and over-hunting of antlerless moose by other hunters.

Ahtna firmly opposes authorizing this antlerless hunt as stated above. However, if the Board does authorize this hunt, it must be a subsistence hunt, not a general hunt, and the priority must apply. There is currently no subsistence moose hunting opportunity in GMU 13(A) in October and March under State regulations. Also, there is no antlerless moose subsistence hunt provided for Unit 13(A) under State regulations. The needs of Ahtna subsistence hunters for moose are not being met by current subsistence hunts. Only after subsistence needs have been met can there be a general drawing hunt.

Ultimately, any additional subsistence moose opportunity should be directed to the Community Subsistence Hunt (CSH). The Board of Game findings for C&T use of moose in GMU 13 support directing any additional subsistence moose hunting opportunity to the CSH. There are restrictions for those in the CSH that clearly demonstrate that any additional moose hunting opportunity should be directed to the CSH. CSH permit restrictions dictate: "No member of the (CSH) household can hold any state drawing/Tier I/Tier II/registration moose



hunts, hold general season moose harvest tickets, or hold federal moose permits outside of the CSH hunt area." Pursuant to these restrictions, a CSH household would not even be eligible to apply for the proposed antlerless draw hunt.

If the Board authorizes the antlerless hunt through the CSH or otherwise, it would also need to require a Tier II permit process for the hunt since the amount of allowable harvest of antlerless moose would exceed subsistence needs.

Proposal 183

Ahtna also opposes Proposal 183 to allow an antlerless moose hunt in GMU 20A and the remainder of GMU 20A, in the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area.

We oppose an antlerless moose hunt in GMU 20A, which could result in killing of cow moose that are either impregnated or have a calf nearby. Killing an impregnated cow would equate to taking a cow and a calf. Allowing the hunting of antlerless moose would also likely result in an increase in the orphaned calf population.

In summary, the moose population should not be managed by human intervention. Moose will move to other areas to find food sources. Humans should be managed, not moose. Ahtna supports allowing a hunt of more bull moose rather than cows.

Please consider our comments during your deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "John Dye".

John Dye
Ahtna, Incorporated
Cultural and Traditional Committee Chair



Submitted By
Nicole Schmitt
Submitted On
3/5/2021 12:44:27 PM
Affiliation
Alaska Wildlife Alliance

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Alaska Wildlife Alliance comment on Proposal 194

On behalf of our Alaska-based membership, Alaska Wildlife Alliance thanks the Board for the opportunity to comment in support of Proposal 194. This proposal appears responsive to the shortcomings of the current regulatory regime in GMU 2.

We understand that the management regime for GMU 2 wolves, prior to the change precipitated by Proposal 43 in 2019, put ADF&G in a difficult situation. The department was tasked with maintaining a “sustainable” wolf population without clear population objectives. While the 2019 management shift provided ADF&G with clear wolf population goals, it removed the mechanism the department had to track wolf harvest during the season (in-season sealing), thereby removing its ability to accurately monitor wolf harvest until after an overharvest occurred. This was the case in the 2019-20 season, and led to unknown harvest rates in the shortened 2020-21 season until a month after the season ended. As ADF&G states in Proposal 194, “accurate population estimates are key to setting annual season length and maintaining the population within the objective range for this contentious population.” We believe that rapid, yet reasonable, harvest reporting is essential to accurately monitoring population levels during the trapping season.

Our primary concern is that the existing management regime for wolves in GMU 2, which relies exclusively on season length as the only mechanism for ensuring sustainable harvest, is inconsistent with constitutional requirements of sustained yield. We are pleased to endorse this proposal, with suggested amendments, as a remedy to the flawed regime currently in place.

Suggested amendments:

- Harvest report within 48 hours and sealing within 5 days (as adopted in GMU 1C)
- Traps must be lifted 24-48 hours after a season or emergency closure

While the proposed 7-day sealing period is far superior to the current 30-day sealing period, we continue to urge the Board to adopt a wolf management regime for GMU 2 similar to that of GMU 1C, Douglas Island. There, a trapper who takes a wolf in the management area must report the harvest to ADF&G Division of Wildlife Conservation in Douglas within 48 hours of taking the wolf and present the hide for sealing within 5 days.

Given that the Alexander Archipelago wolves in GMU 2 are currently undergoing an Endangered Species Act petition review, we encourage the Board to adopt the management regime already in place in GMU 1C for application in GMU 2 to ensure constitutionally provisioned sustained yield. We also urge the Board to amend the proposal to add language that traps must be lifted 24-48 hours after the closing of the season or an emergency closure. This is a prudent and efficient management tool that will ensure proper allowable harvest and avoid exceeding sustainable yield principles mandated by the Alaska Constitution.

While the focus of our involvement in this issue revolves around sustained yield of wolves, the local concern over deer populations must also be acknowledged. Many of Alaska Wildlife Alliance’s members, Board, and staff are hunters. We support Alaskans’ right to harvest of game and fill their freezers, especially those in rural communities such as on Prince of Wales. However, the public assumption that wolves are responsible for deer diminishment in GMU 2 must be candidly discussed and dealt with according to biological and legal requirements.

In the Board discussion of Proposal 43 in 2019, then Chairman Spraker asked Mr. Schumacher whether ADF&G shared the public’s view that deer populations in GMU 2 are declining because of wolves.

Mr. Schumacher responded:

*“The Fish and Wildlife Service went through their species status assessment for wolves, and they did some modeling and looked at long-term habitat condition and came up with, that the long term trend is that **Unit 2 will support fewer deer in the future, primarily due to forest management conditions.** What we’ve seen here are short term changes which seem more likely due to something else, **whether that’s wolves, whether we’ve had, in the last 7 or 8 years record deer harvests,** that could play some role in it. We can’t really speculate but it would be accurate to say that people on the island generally attribute it to the presence, or increased number, of wolves.” [5:34:04](#).*

Mr. Schumacher's response expressly and implicitly acknowledges the underlying tension here – scientific and legal requirements for wildlife management, and the pressures of local residents to harvest deer in large quantities, even as deer habitat has been diminished by timber harvest. The situation has unfortunately resulted in the scapegoating of wolves, where demand for their culling is inconsistent with constitutionally-mandated sustained yield purposes.

In an indirect manner, Proposal 194 addresses sustained yield provisions. From a practical perspective, the proposal gives ADF&G responsible mechanisms that will give the department necessary game management tools to stay in compliance with constitutional requirements. We hope the Board considers and adopts this proposal as a step in the right direction of creating an active and appropriate management regime for GMU 2 that ensures the sustainable harvest of wolves.

Thank you for your consideration in this matter.

Sincerely,

Nicole Schmitt,

Director, Alaska Wildlife Alliance

Alaska Wildlife Alliance was founded by Alaskans in 1978 to advocate for the ecosystem-based management of Alaska's wildlife.



Submitted By
Joel Bennett
Submitted On
3/5/2021 12:28:17 PM
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JOEL BENNETT COMMENT ON PROPOSAL 194

SUPPORT, with amendment, to add a 48-hour reporting requirement and possible reduction in sealing time.

With ADFG's goal of achieving a wolf harvest that falls with the population objective established by the Board of Game, a wolf harvest reporting requirement of 48 hours is a reasonable additional measure to add to ADFG's proposed shorter sealing time requirement. This reporting requirement has precedent in current regulation in GMU 1-C, in the case of another isolated island wolf population.

The 7- day sealing requirement as recommended by ADFG may be reasonable IF a 48-hour reporting requirement after taking a wolf is implemented. If no reporting requirement is added to the proposal by amendment, I would urge the Board to amend the proposal by adopting a shorter sealing requirement. Out of an abundance of caution regarding the risk of overharvest, a 3-day sealing requirement seems prudent, unless there are compelling reasons to make it longer.

As a long-term resident resource user, I appreciate your consideration to adopt measures to assure wolf sustainability in GMU 2.



CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

January 12, 2021

ADF&G Boards Support Section
Attn: Board of Game Comments
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: 2020/2021 Board of Game Proposal 178 (GMU 14C)

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding a regulatory proposal that will affect Chugach State Park. Please consider these comments during the upcoming Board of Game meeting.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory role with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

- 1) To protect and supply a satisfactory water supply for the use of the people;
- 2) To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
- 3) To protect areas of unique and exceptional scenic value;
- 4) To provide areas for the public display of local wildlife; and
- 5) To protect the existing wilderness characteristics of the easterly interior area.

The 15-member advisory board is comprised of park users representing various interests ranging from backcountry skiers, hikers, hunters, bikers, mountain climbers, as well as, ATV and snowmachine users. At approximately 495,000 acres, Chugach State Park comprises nearly half of the Alaska Game Management Unit (GMU) 14C. With over 1.3 million visitors to the park annually, we have an interest in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the 2020/2021 Board of Game regulatory proposal that will affect the park's wildlife and users. Our recommendation and any proposed amendments are included below. This proposal was discussed and voted upon during our January 11, 2021 meeting. 13 members of the board were present, with 2 members being excused.

PROPOSAL 178 REAUTHORIZE THE ANTLERLESS MOOSE SEASONS IN UNIT 14C AS PROPOSED BY THE ALASKA DEPARTMENT OF FISH AND GAME.

Amendment(s) Discussed: None

Recommendation: Approval (13-Yea, 0-Nay)

Findings: This hunt has proven to be an effective tool at managing the moose population within GMU 14C for several years. This proposal comes



directly from the state's authority on wildlife management, the Alaska Department of Fish and Game. Requiring annual renewal of this hunt allows the Department of Fish and Game to closely regulate antlerless moose harvest quotas to keep the moose population within a sustainable number. Keeping the moose population at or near the goal of between 1,500-1,800 moose within GMU 14C helps to avoid over-browsing of winter habitat and the resulting die-offs from starvation.

We greatly appreciate the opportunity to review and submit comments on this proposal. Please let me know if you have any questions regarding this recommendation. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Yelle".

Ryan Yelle
Chair

cc: Haley Johnston, Acting Vice Chair
Ben Corwin, Acting Superintendent, Chugach State Park
Dave Battle, Wildlife Biologist, ADF&G



Submitted By
Jeanie Cole
Submitted On
3/4/2021 1:55:31 PM
Affiliation

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Please support Notice proposal 194, which would create a 7 day sealing period on wolves in Prince of Wales. This would be a step in the right direction of tracking the wolf kill, so the Department could at least issue an Emergency Order to halt the season if needed. It would also allow the Department to estimate the wolf population more accurately in Unit 2, which is essential for setting annual harvest quotas. This shorter sealing requirement would help avoid overharvest which has occurred in this area in the past.



Submitted By
Somerset Jones

Submitted On
1/4/2021

Email
CID1893@mtaonline.net

Proposal 79

The antlerless permit hunts in 14A & B should be no longer allowed. Population studies have been done in Feb when other moose, not resident, winter at Point McKenzie and bulls are losing their antlers, causing inflated population results. During May thru Nov the resident population must bear all the antlerless permits. This is decimating the local Big Lake/ Point McKenzie population and should therefore be stopped.

If there are moose causing problems then they should be hunted via the nuisance moose hunt program and not the antlerless moose permit.

Somerset Jones

Chugiak, AK



KAWERAK, INC.



PC07
1 of 3

Tungwenuk Family Qupak Design, used with permission

January 3, 2021

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomede

Injaliq

Elim

Neviarcuarluaq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Kigiqtaq

Solomon

Anjuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaqruk

Unalakleet

Uqalaaqtiq

Wales

Kinjigin

White Mountain

Natchigvik

ATTN:

**Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526**

Kawerak, Inc. is the regional nonprofit tribal consortium for the Bering Strait/Norton Sound region. We provide services to sixteen communities including advocating for subsistence hunting and fishing. We offer the following comments for the ADF&G; Board of Game consideration.

Kawerak is in support of the following proposal.

Proposal 190 Reauthorize brown bear tag fee exemptions.

The majority of Game Management Unit (GMU) 22 bear harvest by local residents is opportunistic. Moose and caribou are harvested as the main food source. The brown bear population across GMU 22 has risen according to ADF&G's latest bear population survey. The brown bear tag exemption fee for GMU 22 should remain in place to help offer incentive to hunters as well as to help increase harvest opportunity to an ever increasing bear population.

Kawerak is opposed to the following proposal.

Proposal 129 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Require the use of expanding (soft point) bullets for big game hunting, excluding wolf and wolverine.

Big game animals have been ethically and humanely put down with any of the various small caliber high velocity chamberings, with proper shot placement being the key to any hunting situation. Small caliber high velocity ammunition in full metal jacket (FMJ) such as a .223 Remington is more than capable of hitting the vitals of any big game animal. The kill zone on a bull moose is roughly eighteen (18") inches in diameter, bear and caribou slightly smaller. Yes, FMJ's do produce a narrow wound channel compared to expanding type ammunition, however, as long as the shot placement is in the vitals the animal will be humanely and ethically put down.

KAWERAK, INC.

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Advancing the capacity of our people and tribes for the benefit of the region.



Documentation shows that all it takes to ethically put down any big game animal is no more than a one quarter inch (1/4") hole in the vital organs, which the .223 Remington in FMJ is more than capable of performing.

Documentation on small caliber high velocity ammunition, such as the .223 Remington in FMJ, shows that after entry into the target the bullet will often tumble or summersault thus increasing the wound channel (in some cases as much as 3/4"). The majority of rural Alaskan hunters prefer not to waste any meat (due to the high cost of store bought meat). The documentation on expanding bullets clearly shows that the use of this type of ammunition does in fact waste more meat. This is a major factor for rural Alaskan hunters when choosing what type of ammunition to use/purchase.

The proposer states there will be a slight increase in cost due to the change of bullet design. To the contrary, rural Alaskan hunters would have to switch to an entirely different higher caliber rifle in order to go hunting. In many rural communities, small caliber high velocity rifles are passed-down from either the grandfather or the father. New bigger caliber rifles would have to be purchased, and these rifles are substantially higher in cost than a smaller caliber rifle which most rural Alaskan hunters simply cannot afford. A .223 Remington in an expanding type bullet simply does not have enough weight behind the bullet to have any kind of penetration or complete pass through on any big game animal. The cost of living is very high in rural Alaska, however, small caliber high velocity ammunition is more affordable. On the opposite end, larger caliber ammunition in rural Alaska is very expensive.

This proposal as written raises a question of whether it is a simple proposal requesting a bullet change from FMJ to expanding bullets or is the proposal inadvertently requesting to restrict hunting calibers. If this proposal passes, it will inadvertently restrict big game hunting to the larger calibers as no one would use expanding bullets in the smaller high velocity calibers.

Over the years, the Board of Game has deliberated on caliber restriction numerous times and the decisions regarding proposals to limit big game hunting to the larger calibers have always failed. Bigger caliber rifles do not equate to humanely putting down any big game animal. Individual hunters can and do miss the vitals even with the bigger caliber rifles, hitting animals in other parts of the body except where they were intended.

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If you have any questions please feel free to contact VP of Natural Resources; Brandon Ahmasuk @ 907-443-4265 wk. or 907-434-2951 cell, or bahmasuk@kawerak.org. We thank you for your time and consideration.

Sincerely,

KAWERAK, INC.

M. Bahnke

Melanie Bahnke,

President

KAWERAK, INC.

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Submitted By
michael r knapp
Submitted On
12/27/2020 4:36:02 PM
Affiliation

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I am opposed to Proposal 99, the closed areas within Units 14A, 14B, and 16A to trapping. This issue was already addressed at the Borough level and rejected. It doesn't exclude trails that receive public funding that are in the middle of nowhere. Example would be: Petersville and Willow Mountain. Every trail in the Borough's trail plan including those away from civilizations like the Mail Trail is designated as a multi use trail to include skiing and hiking. Every trail in the Borough's plan is and can be considered developed hiking trail. I am also very concerned with using broad definitions of any public funding as that can lead to an imbalance in opportunity and imbalance in power to impose restrictions on the trapping community if any money goes to a trail. This proposal also eliminates a property owners ability to trap on their own land. This proposal leaves no exception to traps set in the trees, below the water, or below the ice which poses no harm to any domesticated animal or person. I am also opposed to #6 - closing Palmer Hay Flats State Game Refuge. This area is so expansive, there is no rationale to close it off entirely to trapping. However, there is a danger of eliminating a family activity that has spurred generations of young people to become engaged in outdoor life by learning how to trap Muskrats in this favored area. Regarding the add on item #10, - there is no rationale to this either. There is no conflict with the camping season and the trapping season as they do not overlap. Most State and Federal campgrounds are closed in the winter when trapping season is happening. This would effectively close all beaver trapping in all of Nancy Lakes State Recreation Area. The Alaska State Parks do not care if you trap beaver under the ice next to a trail or by someones camp or permanent dwelling because they understand it poses no danger. Again, as previously stated, this proposal and several like it, have been soundly rejected at the Borough level, so it is my final opinion that it should be laid to rest and not brought up again.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503

In Reply Refer to:
FWS/IR11/20140

DEC 11 2020

Mr. Stosh Hoffman, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet at to be determined dates to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central and Southwest Region. We have reviewed the 100 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-317-2165-or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

Enclosure



cc: Anthony Christianson, Chair, Federal Subsistence Board
Deputy Assistant Regional Director, Office of Subsistence Management
Policy Coordinator, Office of Subsistence Management
State Subsistence Liaison, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Regional Advisory Council Coordinators, Office of Subsistence Management
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council
Chair, Bristol Bay Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Central and Southwest Region

January 22-29, 2021

Wasilla, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 1 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Shift to later moose hunting seasons in Units 13 and 14.

Current Federal Regulations:

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household Aug. 1-Sep. 20

Unit 13, remainder—1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20

Unit 14—Moose

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase hunting opportunity for Federally qualified subsistence users, and could facilitate meat care by allowing harvest when temperatures are cooler. While the Unit 13 unit-wide moose population has been within State management objectives since 2008, Unit 13B’s population has been below subunit management objectives since 2013. Similarly, the unit-wide bull:cow ratio has been above State management objectives since 2004, while ratios have periodically dropped below objectives in subunits 13A, 13C, and 13E. Unit 13D has had consistently higher bull:cow ratios than the other subunits, averaging 75 bulls:100 cows from 2013-2019. The lowest bull:cow ratios have been observed in the most accessible portions of each subunit (ADF&G 2020a). Unit 13 experiences extremely high harvest pressure, with over 4,000 moose hunters in 2019; less than 9% of these hunters hunted in Unit 13D (ADF&G 2020b). Extending the moose season into October could disrupt breeding moose, depressing the moose population and bull:cow ratios.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 1 **with modification** to extend the season in Unit 13D only. (OSM is only commenting on Unit 13, not Unit 14).

Rationale: Extending the season in Unit 13D would provide more opportunity for Federally qualified subsistence users. There are no conservation concerns in Unit 13D due to a historically high bull:cow



ratio and a moose population within State management objectives. Additionally, harvest pressure is relatively low in Unit 13D.

High harvest pressure combined with bull:cow ratios and populations below State management objectives do not recommend a season extension in the remaining Unit 13 subunits. Additionally, extending the season further into the rut could disrupt breeding, further depressing bull:cow ratios and populations in these areas.

Literature Cited

ADF&G. 2020a. Annual report to the Alaska Board of Game on intensive management for moose with wolf predation control in Unit 13. February 2020. ADF&G, Division of Wildlife Conservation.
<http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.unit13#anchor>. Accessed April 29, 2020.

ADF&G. 2020b. Harvest General Reports database.
<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed October 1, 2020.
Anchorage, AK.

PROPOSAL 6 – 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users.

PROPOSAL 8 – 5 AAC 84.270. Furbearer trapping. Shorten coyote trapping season in Units 9, 13, 14B, 16 and 17.



Current Federal Regulations:

Units 9, 13, 16, 17—Coyote (Trapping)

No limit

Nov. 10–Mar. 31

Unit 14B—Coyote (Trapping)

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users trapping under State regulations and would likely have little impact on the coyote population. The wolf State trapping seasons in these units extend until April 30 or June 30. In Units 13 and 16, the wolf State trapping season opens October 15, while in Unit 9, it opens August 10. Therefore, shortening the coyote season may result in increased incidental take in these units when the wolf season is open, but the coyote season is closed.

Adoption of this proposal would result in alignment of closing dates between Federal and State regulations, decreasing regulatory complexity and user confusion.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Adopting this proposal decreases opportunity for Federally qualified subsistence users, and no conservation concerns exist for coyote in any of these units. Additionally, shortening the coyote season could result in increased incidental take in these units when the wolf season is still open.

PROPOSAL 12 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A.

Current Federal Regulations:

Unit 17A—Moose

Unit 17A—1 bull by State registration permit

Aug. 25-Sep. 20.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit

Up to a 31-day season may be announced



*between Dec. 1-last day
of Feb.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal increases harvest opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is in-line with the Unit 17A Moose Management Plan, and the Unit 17A moose population is growing and can support the additional harvest.

As a fall antlerless moose season does not exist in Federal regulations, a similar proposal would need to be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021 in order to align State and Federal moose regulations in Unit 17A and reduce regulatory complexity and user confusion.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist and harvest opportunity for Federally qualified subsistence users would increase.

PROPOSAL 14 – 5AAC 85.045(15). Hunting seasons and bag limits for moose.

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

Current Federal Regulations:

Unit 17A—Moose

Unit 17A—1 bull by State registration permit

Aug. 25-Sep. 20.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit

Up to a 31-day season may be announced between Dec. 1-last day of Feb.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide more opportunity and flexibility for Federally qualified subsistence users by providing a longer and predictable season. The Unit 17A moose population is currently above management objectives and can withstand additional harvest. These hunts are also managed by harvest quotas, which assures sustainable harvests.



While Federal subsistence winter moose seasons in Unit 17A require State registration permits, adopting this proposal would result in misalignment of season dates, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist as the moose population is currently above State objectives and additional harvest could help prevent habitat degradation. This proposal also increases opportunity and the ability to plan for winter hunts for Federally qualified subsistence users.

PROPOSAL 18 – 5 AAC 85.045. Hunting seasons and bag limits for moose.
Extend the resident winter moose season in Units 17B and 17C.

Current Federal Regulations:

Unit 17—Moose

Units 17B and 17C—one bull

*Aug. 20-Sep. 15.
Dec. 1-31.*

During the period Aug. 20-Sep. 15—one bull by State registration permit; or

During the period Sep. 1-15—one bull with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side with a State harvest ticket; or

During the period Dec. 1-31—one antlered bull by State registration permit

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season and better access to hunting areas when ice and snow conditions are safer. While bull:cow ratios and recent moose population estimates for Units 17B and 17C are not readily available, minimal impact to the population is expected if this proposal is adopted due to low harvest pressure during the winter season. Between 2012 and 2019, an average of 28 moose were reported harvested during the RM585 winter season, compared to an average of 159 moose reported harvested during the RM583 fall season (ADF&G 2020).

While the Federal subsistence December moose season in Units 17B and 17C require the State RM585 registration permit, adopting this proposal would result in misalignment of season dates, increasing



regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 18 **with modification** to also extend the winter moose season in Unit 17B, the portions extending 2 miles on either side of, and including, the following rivers: Nushagak River, beginning at the southern boundary of Unit 17B and extending north to the Chichitnok River, and including Harris Creek, Klutuspak Creek, King Salmon River and the Chichitnok River; Mulchatna River upstream to the mouth of the Chilchitna; Nuyakuk River extending west up to the falls; Koktuli River up to the mouth of the Swan River; and Stuyahok River to the confluence of the North/South Forks.

Rationale: Harvest opportunity for Federally qualified subsistence users would increase and minimal impacts to the moose population are expected due to low harvest pressure. Applying the extended season to all of Unit 17B and the entire RM585 permit area further increases opportunity and simplifies regulations.

Literature Cited

ADF&G. 2020. Harvest General Reports database.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed October 2, 2020. Anchorage, AK.

PROPOSAL 19 – 5 AAC 92.108. Identified big game prey populations and objectives.

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

Current Federal Regulations: N/A.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would help ensure Mulchatna Caribou are available for future harvest by Federally qualified subsistence users. Revising population and harvest objectives, informed by habitat quality studies, will promote effective, sustainable management of this important subsistence resource.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: OSM is concerned about the health and conservation of the Mulchatna Caribou Herd and supports measures to ensure the herd's sustainability.

PROPOSAL 20 – 5 AAC 85.025 (3)(4)(12)(13)(14). Hunting seasons and bag limits for caribou. 5 AAC 92.062. Priority for subsistence hunting; Tier II permits. Establish Tier II subsistence hunting season and bag limit for the Mulchatna caribou herd (MCH).

Current Federal Regulations:



Unit 9–Caribou

Unit 9A—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 9B—2 caribou by State registration permit Aug. 1 – Mar. 31.

Unit 9C, that portion within the Alagnak River drainage—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 9C, that portion draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek—2 caribou by State registration permit. Public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik Aug. 1 – Mar. 15.

Unit 17–Caribou

Unit 17A-all drainages west of Right Hand Point—2 caribou by State registration permit Aug. 1 – Mar. 31.

Units 17B and 17C-that portion of 17C east of the Wood River and Wood River Lakes—2 caribou by State registration permit Aug. 1 – Mar. 31.

Unit 18–Caribou

Unit 18-that portion to the east and south of the Kuskokwim River—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 18, remainder—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 19–Caribou

Units 19A and 19B (excluding rural Alaska residents of Lime Village)—2 caribou by State registration permit Aug. 1 – Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The regulations listed above are the codified Federal regulations. The Federal Subsistence Board approved modified regulations for the Mulchatna Caribou Herd (MCH) for the 2020/21 and 2021/22 regulatory years via Wildlife Special Action WSA20-04. WSA20-04 delegated authority to the Togiak National Wildlife Refuge (NWR) manager to open/close seasons, announce harvest limits, and set sex restrictions. In July 2020, the Togiak NWR manager announced a fall 2020 season of Aug. 1-Sept. 20 with a harvest limit of one bull.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users by shortening seasons and decreasing harvest limits. However, opportunity has already been reduced under State and Federal regulations during the 2019/20 and 2020/21 regulatory years because of conservation concerns for the MCH. Adopting this proposal would help conserve the MCH, particularly by closing the season during the rut, which could promote calf production and herd growth.



Adoption of this proposal would also result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. Federal regulations currently require the State RC503 registration permit. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** the proposed season and harvest limit changes and is **neutral** on the hunt structure/Tier II permits.

Rationale: While this proposal would decrease opportunity for Federally qualified subsistence users, conservation measures and more conservative harvest regulations are needed for the MCH due to its recent, substantial population decline.

PROPOSAL 23 – 5 AAC 92.080(4)(B)(vii). Unlawful methods of taking game; exceptions.

Allow the use of snowmachine to position wolf or wolverine for harvest in Unit 17.

Current Federal Regulations:

§ ____ .26 Subsistence taking of wildlife

...

(b) Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

...

(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased.

(5) Using a motorized vehicle to drive, herd, or molest wildlife.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board deferred Proposal WP20-26 at their April 2020 meeting, which requested using a snowmachine to position wolves and wolverines in Unit 17. The Federal Subsistence Board is evaluating if there is a more consistent, enforceable, and statewide approach that would ensure compliance with multi-agency regulations while allowing efficient take of subsistence resources.

PROPOSAL 24 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

5 AAC 92.220. Salvage of game meat, furs, and hides. Establish a season, daily and seasonal bag limit, and salvage requirement for Alaska hare in Unit 17.

Current Federal Regulations:



Unit 17—Hare (Snowshoe and Tundra)

No limit

July 1 – June 30.

§__.25(j)(2) *If you take wildlife for subsistence, you must salvage the following parts for human use:*

* * * *

(iv) The hide or meat of squirrels, hares, marmots, beaver, muskrats, or unclassified wildlife.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Shortening the hunting season and decreasing the harvest limit for Alaska hare would decrease harvest opportunity for Federally qualified subsistence users, although harvest is likely low. However, conservation concerns exist for Alaska Hare as current abundance appears low and below historic levels throughout its range (Merizon and Carroll 2019). Closing the season during the breeding season between April and June when hares congregate (Murray 2003) and may be most susceptible to harvest should help conserve this species. Requiring the salvage of the hide or meat is in-line with subsistence harvest principles of utilizing harvested resources.

Adoption of the season and harvest limit part of this proposal would also result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021. Adoption of the salvage requirement would align Federal and State regulations, decreasing regulatory complexity and user confusion.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Conservation concerns exist for Alaska Hares throughout its range. Requiring salvage of the meat or hide aligns Federal and State regulations and is in accordance with subsistence harvest principles.

Literature Cited

Merizon, R.A. and C.J. Carroll. 2019. Status of grouse, ptarmigan, and hare in Alaska, 2017 and 2018. ADF&G. Juneau, AK.

Murray, D.L. 2003. Snowshoe hares and other hares. Pages 147 – 175 in G.A Feldhamer, B.C. Thompson and J.A. Chapman, eds. Wild mammals of North America: Biology Management and Conservation. The Johns Hopkins University Press. Baltimore, MD. 1216 pp.

PROPOSAL 30 – 5 AAC 84.270. Furbearer trapping. Shorten the wolf trapping season in Units 9 and 10.

Current Federal Regulations:



Units 9, 10—Wolf

No limit

Nov. 10 – Mar. 31

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While shortening the season would decrease opportunity for Federally qualified subsistence users, it is unlikely many users target wolves in May and June during the denning season and when fur quality is deteriorating. Changing the closing date of the wolf trapping season in Units 9 and 10 to April 30 would also align (or come closer to aligning with) the closing date of the coyote trapping season in these units under State regulations, which could reduce incidental take issues. Adopting this proposal may also reduce secondary impacts of taking wolves with active dens.

Federal and State wolf trapping seasons are currently misaligned for these units and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Take of wolves during the denning season in May and June is likely low and fur quality is deteriorating. Shortening the State wolf trapping season brings these regulations more closely in line with State coyote and Federal wolf trapping seasons, reducing incidental take issues and reducing regulatory complexity.

PROPOSAL 31 – 5 AAC 84.270. Furbearer trapping. 5 AAC 85.057. Hunting seasons and bag limits for wolverine. Close wolverine trapping and hunting in Unit 10.

Current Federal Regulations:

Unit 10—Wolverine (Hunting)

1 wolverine

Sep. 1 – Mar. 31

Unit 10—Wolverine (Trapping)

No limit

Nov. 10 – Feb. 28

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users, although wolverine harvest in Unit 10 appears to be extremely low



to nonexistent. No conservation concerns exist for wolverine in Unit 10 due to the lack of harvest, and ADF&G questions whether wolverines still occur on Unimak Island.

Adoption of this proposal would also result in misalignment between Federal and State regulations in Unit 10, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: While adopting this proposal would decrease opportunity, wolverines are not being harvested in Unit 10 and may not even occur in the unit anymore. Regardless, harvest opportunity is not warranted for an extremely low or even nonexistent population.

PROPOSAL 58 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 13.

Current Federal Regulations:

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household Aug. 1-Sep. 20

Unit 13, remainder—1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. The Unit 13A moose population is within State management objectives and can sustain limited antlerless moose harvest. The hunt is also closely managed through permit numbers, which ensures sustainable harvests.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist as the antlerless hunt is closely managed through permit numbers and monitoring of the Unit 13 moose population.

PROPOSAL 62 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Establish an antlerless moose season in Unit 13E.



Current Federal Regulations:

Unit 13E—Moose

*Unit 13E—1 antlered bull moose by Federal registration permit only; only Aug. 1-Sep. 20
1 permit will be issued per household*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. The Unit 13E moose population has been within or above State management objectives and can sustain limited antlerless moose harvest. The hunt would also be closely managed through permit numbers, which ensures sustainable harvests.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist as the antlerless hunt would be closely managed through permit numbers and monitoring of the Unit 13E moose population.

PROPOSAL 71 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine.
Lengthen the wolverine hunting season in Unit 13.

Current Federal Regulations:

Unit 13—Wolverine (Hunting)

1 wolverine *Sep. 1 – Feb. 28*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season under State hunting regulations. No impact to the wolverine population is expected as unlimited harvest is allowed under trapping regulations, and wolverines may be shot under a trapping license.

Adopting this proposal would almost align State and Federal seasons for wolverine hunting in Unit 13, decreasing regulatory complexity and user confusion. During leap years, the State season would be one day longer than the Federal season.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.



Rationale: No conservation concerns exist. This proposal would increase opportunity for Federally qualified subsistence user and align State and Federal hunting seasons.

PROPOSAL 72 – 5 AAC 84.270. Furbearer trapping.

Extend the wolverine trapping season in Unit 13.

Current Federal Regulations:

Unit 13—Wolverine (Trapping)

No limit

Nov. 10 – Feb. 28

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season under State trapping regulations. Minimal impact to the wolverine population is expected as current harvest limits for trapping are ‘no limit’ and the Federal wolverine trapping season already extends until Feb. 28. Adopting this proposal would almost align State and Federal seasons for wolverine trapping in Unit 13, decreasing regulatory complexity and user confusion. During leap years, the State season would be one day longer than the Federal season.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Minimal conservation concerns exist. This proposal would increase opportunity for Federally qualified subsistence user and align State and Federal trapping seasons.

PROPOSAL 73 – 5 AAC 84.270. Furbearer trapping.

Extend the wolverine trapping season in Unit 13.

See comments for Proposal 72.

PROPOSAL 76 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Extend the ptarmigan season and the lower bag limit in Unit 13B and 13E.

Current Federal Regulations:

Unit 13—Ptarmigan (Rock, Willow, and White-tailed)

20 per day, 40 in possession

Aug. 10-Mar. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: Extending the season would increase, while lowering the harvest limit would decrease opportunity for Federally qualified subsistence users. Conservation concerns exist for ptarmigan in Unit 13 as populations have declined, particularly along the road-accessible areas in Units 13E and 13B where harvest pressure is highest. Extending the season could exacerbate these concerns as ptarmigan are easier to hunt during March when they are entering the breeding season and less prone to flying. Additionally, late winter (mid-February-March) harvest mortality historically accounted for 60% of the Unit 13 ptarmigan harvest, appears to be additive, and contributed to the population declines. State regulations changed in 2018 and more time is needed to assess the effectiveness of these regulation changes before making additional changes (OSM 2019).

Federal subsistence and State ptarmigan regulations are currently misaligned in Unit 13 and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Conservation concerns exist for ptarmigan in Unit 13. Extending the season to March 31 could result in higher harvests and additive mortality, preventing population recovery.

Literature Cited

OSM. 2019. Staff analysis WSA19-08. Office of Subsistence Management, USFWS. Anchorage, AK. <https://www.doi.gov/subsistence/wildlife-special-actions>. Accessed October 6, 2020.

PROPOSAL 84 – AAC 85.045. Hunting seasons and bag limits for moose.
Establish an antlerless moose season in Unit 16B.

Current Federal Regulations:

Unit 16—Moose

Unit 16B-Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull Sep. 1-15.

Unit 16B-Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household Sep. 1-30.
Dec. 1-Feb. 28.

Unit 16B, remainder—1 bull Sep. 1-30.
Dec. 1-Feb. 28.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as the proposed hunts are a Tier II and drawing hunt with a limited number of permits. The Unit 16B moose population is currently above State management objectives and can sustain limited antlerless moose harvest. The hunt would also be closely managed through permit numbers, which ensures sustainable harvests.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist as the antlerless hunt would be closely managed through permit numbers and monitoring of the Unit 16B moose population.

PROPOSAL 98 – 5 AAC 84.270. Furbearer trapping.

Extend the beaver trapping season in Unit 16.

Current Federal Regulations:

Unit 16—Beaver

No limit

Oct. 10 – May 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users. Beaver are considered common in the region according to trapper questionnaires, mitigating conservation concerns.

Federal subsistence and State beaver regulations are currently misaligned in Unit 16 and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist and harvest opportunity would increase.



United States Department of the Interior



U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503

In Reply Refer to:
FWS/IR11/20139

DEC 11 2020

Mr. Stosh Hoffman, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet at to be determined dates to deliberate proposals concerning changes to Statewide regulations governing hunting and trapping of wildlife. We have reviewed the 90 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, Office of Subsistence Management, State Subsistence Liaison, 907-317-2165 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

Enclosure



cc: Chair, Federal Subsistence Board
Deputy Assistant Regional Director, Office of Subsistence Management
Policy Coordinator, Office of Subsistence Management
State Subsistence Liaison, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Subsistence Regional Advisory Council Coordinators,
Office of Subsistence Management
Chair, Southeast Alaska Subsistence Regional Advisory Council
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council
Chair, Bristol Bay Subsistence Regional Advisory Council
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Western Interior Alaska Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, Eastern Interior Alaska Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Statewide Regulations

March 12-19, 2021

Fairbanks, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 130 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of deer or elk urine as bait or natural scent lures.

Current Federal Regulations:

§__.25(a) *Definitions. The following definitions apply to all regulations contained in this part:*

Scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal could benefit wildlife populations by preventing the infection and spread of chronic wasting disease (CWD). While CWD has not been detected in Alaska, preventing disease is much easier than mitigating its spread once detected. This proposal could burden subsistence users who would no longer be able to use cervid urine as a scent lure.

Of note, the definition for scent lure under Federal subsistence hunting regulations pertains only to bear baiting and contains no prohibition on any cervid urine. As such, cervid urine can be used as a scent lure under Federal subsistence hunting regulations. Adoption of this proposal would result in misalignment between State and Federal regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: OSM supports preventing the transmission of disease to maintain healthy wildlife populations. However, to be truly effective, a similar proposal needs to be submitted to the Federal Subsistence Board.

PROPOSAL 131 – 5 AAC 92.210. Game as animal food or bait.

Allow the use of game bird wings and backs to be used for trapping bait.

Current Federal Regulations:

§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:

(i) The hide, skin, viscera, head, or bones of wildlife;

(ii) The skinned carcass of a furbearer;



(iii) *Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;*

(iv) *Unclassified wildlife.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

PROPOSAL 132 – 5 AAC 92.990. Definitions. 5 AAC 92.210. Game as animal food or bait. 5 AAC 92.220. Salvage of game meat, furs, and hides.
Allow bird wings and parts to be used for trapping.

[See comments for Proposal 131.](#)

PROPOSAL 170 – 5 AAC 92.450. Description of game management units.
Modify the Unit 1C and Unit 4 boundaries.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(n)(1)(iii) Unit 1C consists of that portion of Unit 1 draining into Stephens Passage and Lynn Canal north of Cape Fanshaw and south of the latitude of Eldred Rock including Berners Bay,



Sullivan Island, and all mainland portions north of Chichagof Island and south of the latitude of Eldred Rock, excluding drainages into Farragut Bay.

(n)(4)(i) Unit 4 consists of all islands south and west of Unit 1C and north of Unit 3 including Admiralty, Baranof, Chichagof, Yakobi, Inian, Lemesurier, and Pleasant Islands.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: If this proposal is adopted, Federally qualified subsistence users would need to abide by the State Unit 1C regulations on Pleasant and Porpoise islands. However, as these islands are part of Tongass National Forest, Federally qualified subsistence users could continue hunting on these islands under the Federal subsistence hunting regulation for Unit 4. As Unit 1C has a black bear season, whereas Unit 4 does not, adopting this proposal would increase harvest opportunity for black bear by Federally qualified subsistence users on Pleasant and Porpoise islands under State regulations.

Adopting this proposal would result in more conservative State regulations for deer on Pleasant and Porpoise Islands. While ADF&G cites conservation concerns and unsustainable harvest for deer on these islands under the current Unit 4 regulations, including harvest by Federally qualified subsistence users under Federal regulations, Federal regulations and harvest would not be affected by this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would misalign State and Federal unit boundaries for Units 1C and 4, creating user confusion and regulatory complexity. A similar proposal would need to be adopted by the Federal Subsistence Board to fully address the conservation and overharvest concerns for deer stated by the proponent, ADF&G.

PROPOSAL 171 – 5 AAC 92.450. Description of game management units.

Divide Unit 19A into two subunits.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(n)(19)(i)(A) Unit 19A consists of the Kuskokwim River drainage downstream from and including the Moose Creek drainage on the north bank and downstream from and including the Stony River drainage on the south bank, excluding Unit 19B.



Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: No impact to Federally qualified subsistence users or wildlife is expected from adopting this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would misalign State and Federal unit boundaries for Unit 19, increasing user confusion and regulatory complexity.

PROPOSAL 173 – 5 AAC 92.530(7). Management areas.
Repeal the Dalton Highway Corridor Management Area.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(20)(ii)(C) You may not use firearms, snowmobiles, licensed highway vehicles or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions of Units 20, 24, 25, and 26 extending 5 miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.

Note: The exact same regulation is found in: (24)(ii)(A); (25)(ii)(A); and (26)(ii)(B)

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: A repeal of the Dalton Highway Corridor Management Area (DHCMA) would have a significant impact on Federally qualified subsistence users living within the DHCMA and residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, and Stevens Village, as they currently can use snowmobiles and firearms to take wildlife within the DHCMA. If this proposal is adopted, competition with other Alaska residents would increase and would likely result in lower success rates and decreased opportunity for local subsistence users.



Caribou populations from the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WCH), and the Central Arctic Caribou Herd (CACH) have ranges that overlap the DHCMA. Repeal of the DHCMA is not recommended as this would increase the disturbance from hunting pressure on caribou and other wildlife populations.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Repealing the DHCMA may create a conservation concern for caribou and other wildlife due to increased access and disturbance from snowmachines and firearms. Retaining the DHMCA allows caribou to move more freely with less disturbance during migration, and provides better opportunity and a rural subsistence priority for Federally qualified subsistence users.

PROPOSAL 174 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 1C.

Current Federal Regulations:

Unit 1C–Moose

Unit 1C—that portion south of Point Hobart including all Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only Sep. 15-Oct. 15.

Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only Sep. 15-Oct. 15.

Unit 1C—Berners Bay—1 bull by drawing permit Sep.15-Oct. 15
(will be

announced starting in 2019). Only one moose permit may be issued per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Both antlerless moose seasons in Unit 1C are by draw permit only and ADF&G has the management authority to determine how many permits to issue each year. As Unit 1C moose populations do not currently support any antlerless harvest, ADF&G has indicated no permits will be issued this year. Therefore, no impacts to Federally qualified subsistence users or wildlife are expected from adoption of this proposal.



Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: While the Unit 1C moose populations do not currently support any antlerless moose harvest, reauthorizing these draw permit-only seasons maintains management flexibility for ADF&G to provide more harvest opportunity in the event that populations increase to a level warranting antlerless harvest.

PROPOSAL 175 – 5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunt in Unit 5A, Nunatak Bench.

Current Federal Regulations:

Unit 5A–Moose

Unit 5A-Nunatak Bench—1 moose by State registration permit only. The season will be closed when 5 moose have been taken from the Nunatak Bench Nov. 15-Feb. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years due to a low moose population. If this proposal is adopted, Federal and State regulations would maintain alignment, decreasing regulatory complexity and user confusion.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: While the Nunatak Bench moose population does not currently support any antlerless moose harvest, reauthorizing this quota-managed hunt maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the population increases to a level threatening habitat damage and warranting antlerless harvest.

PROPOSAL 176 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C–Moose

Unit 6C—1 antlerless moose by Federal drawing permit only Sep. 1-Oct. 31.

Permits for the portion of the antlerless moose quota not harvested in the Sep. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.



Unit 6C—1 bull by Federal drawing permit only

Sep. 1-Dec. 31.

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits.

Federal public lands are closed to the harvest of moose except by federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec. 31

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years because the antlerless moose quota has been met under Federal regulations. As this hunt is closely managed by a joint State/Federal harvest quota, no impact to the moose population is expected if this proposal is adopted.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. While the Unit 6C moose population does not currently support additional antlerless moose harvest under State regulations, reauthorizing this season maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the available antlerless harvest quota is not met under Federal regulations or if warranted by population or habitat conditions.

PROPOSAL 177 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

Current Federal Regulations:

Unit 7—Moose

Unit 7, remainder--1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 10-Sep. 20.

Unit 14—Moose

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? No



Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. These hunts are closely managed through permit numbers, which ensures sustainable harvests. These antlerless hunts also help reduce over-browsing of habitat and moose-vehicle collisions.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist as the antlerless hunt is closely managed through permit numbers; these hunts also provide additional hunting opportunity.

PROPOSAL 181 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.
Reauthorize the resident antlerless moose season in Unit 18.

Current Federal Regulations:

Unit 18–Moose

Unit 18—south of the Eek River drainage and north of the Goodnews River drainage—1 antlered bull by State registration permit *Sept. 1-30.*

Unit 18--Goodnews River drainage and south to the Unit 18 boundary--1 antlered bull by State registration permit *Sep. 1-30.*

OR

1 moose by State registration permit *A season may be announced between Dec. 1 and the last day of Feb.*

Unit 18, remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30 *Aug. 1-Apr. 30.*

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 18, remainder moose population is very high, continues to grow and can support additional harvest. While the Goodnews River drainage moose population can support some additional harvest, the antlerless moose season can be closed by Emergency Order if needed, and the quota has not been met in recent years.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and these moose populations can withstand additional harvest.



PROPOSAL 182 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a winter antlerless moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D–Moose

Unit 19D-that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork—1 antlered bull Sep. 1-30.

Unit 19D-remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sep. 1-30.

Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sep. 1-30.

Dec. 1-15.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 19D moose population is exhibiting signs of nutritional stress as evidenced by low twinning rates, warranting antlerless harvest to help stabilize the population and curtail over browsing of habitat.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and this moose population warrants additional harvest.

PROPOSAL 186 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21D–Moose

Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek—1 moose by State registration permit. Aug. 22 - 31
Sept. 5 - 25

Antlerless moose may be taken only during Sept. 21 - 25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager Mar. 1 - 31

Antlerless moose may be harvested during any of the winter seasons. Season may be announced.

Harvest of cow moose accompanied by calves is prohibited.



Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Kaiyuh Flats moose population is growing rapidly and can support additional harvest.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Kaiyuh Flats area of Unit 21D, and additional cow moose harvest may help this population grow at a more sustainable rate.

PROPOSAL 187 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.
Reauthorize a winter any-moose season during part of February and March in Unit 21E.

Current Federal Regulations:

Unit 21E–Moose

Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30 Aug. 25-Sep. 30.

During the Feb. 15—Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season Feb. 15-Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The moose population in Unit 21E is growing, beginning to show signs of nutritional stress, and can support additional harvest.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Unit 21E, and additional harvest may help stabilize the population and prevent overutilization of the habitat.

PROPOSAL 188 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose season in the western portion of Unit 26A.



Current Federal Regulations:

Unit 26A–Moose

Unit 26A—that portion west of 156°00' W longitude excluding the Colville River drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf July 1-Sep. 14.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. However, Federally qualified subsistence users would still be able to harvest antlerless moose under Federal subsistence regulations if this season is not reauthorized under State regulations. While the moose population is very sparse in this area, hunting pressure and harvest is extremely low, minimizing conservation concerns.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and low harvest pressure minimizes conservation concerns.

PROPOSAL 189 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that



Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users.

PROPOSAL 190 – 5 AAC 92.015. Brown bear tag fee exemptions.

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

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users.