

**ALASKA DEPARTMENT OF FISH AND GAME**  
**STAFF COMMENTS FOR PROPOSALS 89-91, 126-128, 187, 131-133, 144**  
**STATEWIDE REGULATIONS PROPOSALS**  
**ALASKA BOARD OF GAME MEETING**  
**ANCHORAGE, ALASKA**  
**MARCH 21-28, 2025**



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 21-28, 2025 in Anchorage, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

**PROPOSAL 89 – 5 AAC 92.003. Hunter education and orientation requirements.** Require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second-degree of kindred.

**PROPOSED BY:** Janessa Newman and Charlie Wright

**WHAT WOULD THE PROPOSAL DO?** Require nonresident moose hunters to attend a department-approved hunter education certification course and be accompanied by a registered guide or resident family member within the second degree of kindred.

**WHAT ARE THE CURRENT REGULATIONS?**

5 AAC 92.003. Hunter education and orientation requirements.

(a) Except for a beneficiary of a proxy hunter, a person born after January 1, 1986 that is

(1) required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 7, 13, 14, 15, and 20;

(2) not required to have a hunting license, and who has not successfully completed a certified hunter education course, must, in order to hunt in Units 7, 13, 14, 15, and 20, be under the direct immediate supervision of a licensed hunter who

(A) is 18 years of age or older and has successfully completed a certified hunter education course; or

(B) was born on or before January 1, 1986.

...

(c) A nonresident hunter in Unit 17(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or must be accompanied by a registered guide or resident family member within the second degree of kindred.

(d) A nonresident hunter in Unit 19(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or caribou or must be accompanied by a registered guide or resident family member within the second degree of kindred.

...

(m) A person must have successfully completed a department-approved hunter orientation course, to include antler recognition, prior to hunting moose in Units 7 and 15.

(n) A nonresident hunter in Units 21(A) and 21(E) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting moose or must be accompanied by a registered guide.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would require all nonresident moose hunters to successfully complete a department-approved hunter orientation course prior to hunting and be accompanied by a registered guide or resident relative within second-degree of kindred.

**BACKGROUND:** Currently, all hunters born after January 1, 1986 in units 7, 13, 14, 15, and 20 must have completed a department-approved hunter education certification course. Hunters who

were born before this date do not have a requirement for hunter education. Therefore, older nonresident moose hunters may not have completed a hunter education course which includes meat care and wildlife identification. In addition, a nonresident moose hunter may be accompanied by a family member who also has not completed a hunter education certification course because they are not required to based on age.

There is strong evidence that hunter education has been successful in Alaska and other states at reducing firearm incidents, wounding loss, and hunting violations. Every state offers a hunter education certification course which follows educational standards administered by the International Hunter Education Association (IHEA-USA) and provides training in firearms safety, wildlife conservation, and respect for our natural resources, landowners, and other hunters. The Alaska Department of Fish & Game has reciprocity with all 50 states and many other countries, and accepts these courses from other states and countries to meet current hunter education requirements in Alaska.

Many states have hunter education requirements for resident and nonresident hunters so it would not be a hardship for nonresident hunters to obtain a hunter education certification from their home state.

The department has several examples of both required and optional hunter orientation options such as the *Moose Hunter Orientation* which is required for all moose hunters in Units 7 and 15, and the “Is This Mose Legal” video which is optional to watch but highly encouraged. Orientations are used most often to address specific concerns such as area specific considerations like hunting close to highly populated areas (Anchorage hillside or Joint-Base-Elmendorf-Richardson), or stressing the difficulties and importance of reducing the harvest of female game animals, etc. It is difficult to quantify the success of orientation programs; though the department has seen some success when reducing the harvest of female mountain goats was the goal and when the board allocates use of a certain area (e.g., river corridors) to reduce hunter conflict.

Moose are not a guide-required species, though the board has allocated some moose hunting opportunity to both nonresidents guided by an Alaska-licensed guide and some to nonresidents who are not guided. Nonresidents hunting with resident relatives and nonresidents hunting on their own are included in the “non-guided” category. Nonresident moose hunters are not statutorily required to be accompanied by either a relative or a guide.

Since the department began offering the Moose Hunter Orientation, which is required for all hunters to hunt moose in Units 7 and 15, 19,305 people have taken it, and of those, 2,110 provided an out of state mailing address. Residency is not captured when a user takes the orientation and some people have taken the orientation multiple times. Since the department began offering the Nonresident Moose Hunter Orientation course, which is required in Units 17A, 17B, 19B, 21A, and 21E, 1,832 people have taken the course. Like the Moose Hunter

Orientation course, people who take the orientation are not required to provide their residency, and people can take the course multiple times.

In Regulatory Year 2023 (RY23), the department issued 3,022 general season moose harvest tickets to nonresident hunters. Of those, 2,048 reported hunting, and 919 reported successfully harvesting a moose. Of the 2,048 that reported hunting, 483 reported using a guide. There are no reporting requirements for moose hunters to report if they are either accompanied by a resident relative within second-degree of kindred or if they are accompanied by a resident.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on requiring nonresident moose hunters to attend a department-approved hunter orientation or education course. The department has concerns with requiring all nonresident moose hunters to be accompanied by guides or resident relatives within the second-degree of kindred because this is more akin to requiring guides or second-degree of kindred relatives statewide versus allocating within nonresident hunters in specific areas for specific reasons. Because the board has allocated between guided and nonguided nonresident moose hunters in specific areas and not statewide, the board should consult with the Department of Law for guidance on this proposal to determine if the authority exists for the board to make a species not required to be guided in statute, to be required to be guided in regulation.

**COST ANALYSIS:** Adoption of this proposal may result in additional cost to the department depending on the course and delivery method.

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**PROPOSAL 90 – 5 AAC 92.003 Hunter education and orientation requirements.** Require all goat hunters to pass an online mountain goat quiz prior to hunting mountain goats.

**PROPOSED BY:** Jon Nicholas Kruger

**WHAT WOULD THE PROPOSAL DO?** Require that all mountain goat hunters, statewide, pass the department’s online quiz before hunting goats.

**WHAT ARE THE CURRENT REGULATIONS?** A person must successfully complete a department-approved hunter orientation course, to include sex identification, before hunting mountain goat in Units 1-5. In Units 6C and 6D a requirement for mountain goat hunters to successfully complete the department’s on-line mountain goat quiz is included as a condition on all mountain goat registration permits.

There are positive customary and traditional (C&T) use findings for mountain goats in Units 1, 5, 6C, 6D, 7, and 15C outside of the nonsubsistence areas, with various amounts reasonably necessary for subsistence (ANS). There are negative C&T use findings for mountain goats in Units 4, 8, 11, and 13D.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would require all hunters participating in mountain goat hunts to pass the department's online quiz before hunting. The goal of this proposal is to require mountain goat hunters to demonstrate ability to distinguish male (billy) from female (nanny) mountain goats before hunting to encourage take of billies. The department's online educational materials explain that goat populations are sensitive to nanny harvest and help hunters identify features that distinguish billies from nannies. Passing the department's online quiz demonstrates that a hunter has learned the key identifying features of billies and nannies. Harvesting fewer female goats will increase long-term harvest opportunity for mountain goats. Educating hunters to distinguish billies from nannies would also benefit management goals in hunts like RG480 in Unit 8 where nanny take is encouraged.

**BACKGROUND:** Harvesting nannies usually limits long-term harvest potential, particularly in native (not introduced) goat populations. Nannies do not breed until they are 5 years old; nannies in native populations normally give birth to one kid every other year. Twinning is rare. Nannies generally live 10-12 years so, on average, a nanny will produce only 3-4 kids in her lifetime. Assuming a 50:50 sex ratio at birth and average kid survival to breeding age, a typical nanny will barely replace herself in the population. Although nannies in introduced populations tend to be more productive, this inherently low rate of productivity in native populations is why most goat populations are sensitive to nanny harvest and why long-term harvest opportunity is maximized by harvesting billies.

In most units, the department manages goat populations with a guideline harvest level point system where, for every 100 adult goats counted during a survey, 6 goat points are allocated for harvest. A billy is valued at one point and a nanny is valued at two points. When the harvest point total for individual hunt areas is reached, the hunt is closed by emergency order. If only billies are harvested, six goats or roughly 6% of the count can be harvested. However, if only nannies are taken, only three goats can be harvested and productivity of the population will be reduced, limiting future harvest opportunity.

Goat hunters have been required to pass the department's on-line goat quiz as a permit condition in Units 1D, 6C, and 6D for nearly a decade. In 2023 the board adopted that requirement into regulation for all goat hunts in Units 1-5. To evaluate the effect of requiring hunters to pass the quiz, we compared the percentage of nannies in the harvest for the 5 years prior to the quiz being required (RY2018-RY2022) for Units 1A, 1B, 1C, 4, and 5 with the percentage of nannies in the harvest in RY2023 and hunts to date in RY2024 (some hunts remain open). In the 5 years prior to the quiz being required, nannies made up 19% of the harvest in those units. From data available for RY2023 and through November 22 in RY2024, nannies made up 13% of the harvest. More years of data are needed to better evaluate the effect of requiring the quiz.

The goat quiz has been required as a permit condition in Unit 1D since RY2016. In the first year after the quiz was required, nannies made up 46% of the harvest. However, since then, the percentage of nannies in the Unit 1D harvest has ranged from 13% - 32%.

Penalties for taking nannies may have greater influence on how selective individual hunters are when harvesting goats. In GMU 4, from RY2012-RY2016 individual goat hunt areas were closed in the year after a nanny was taken. Under that strategy, nannies accounted for just over 10% of the harvest. However, after RY2016 that practice was relaxed and the proportion of nannies in the harvest increased and has averaged about 20%.

The department is currently testing a different incentive to encourage resident hunters to take billies in Unit 1D. In that unit, most goats are taken by Unit 1D residents and nannies typically account for about 30% of the harvest. Beginning in RY2023 resident hunters who take a nanny in Unit 1D were ineligible to hunt goats in Unit 1D during the following regulatory year. The effect of this incentive to take billies is not yet clear.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. The department can sustainably manage goat populations and harvest with or without requiring hunters to review educational material and pass a quiz. However, reducing harvest of nannies will allow greater harvest over the long term.

To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a normally diligent hunter with reasonable opportunity of success in taking a goat for subsistence uses if the proposal is adopted

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 91 – 5 AAC 92.003 Hunter education and orientation requirements.** Require all goat hunters pass an online mountain goat quiz prior to hunting mountain goats.

**PROPOSED BY:** Paul Forward

**WHAT WOULD THE PROPOSAL DO?** Require that all hunters participating in registration or draw hunts for mountain goats statewide pass the department’s online quiz before hunting goats.

**WHAT ARE THE CURRENT REGULATIONS?** A person must successfully complete a department-approved hunter orientation course, to include sex identification, before hunting mountain goat in Units 1-5. In Units 6C and 6D a requirement for mountain goat hunters to successfully complete the department’s on-line mountain goat quiz is included as a condition on all mountain goat registration permits.

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**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would require all hunters participating in registration and draw hunts for mountain goats to pass the department's online quiz before hunting. The goal of this proposal is to require mountain goat hunters to demonstrate ability to distinguish male (billy) from female (nanny) mountain goats before hunting to encourage take of billies. The department's online educational materials explain that goat populations are sensitive to nanny harvest and help hunters identify features that distinguish billies from nannies. Passing the department's online quiz demonstrates that a hunter has learned the key identifying features of billies and nannies. Harvesting fewer nannies will increase long term harvest opportunity for mountain goats. Educating hunters to distinguish billies from nannies would also benefit management goals in hunts like RG480 in Unit 8 where nanny take is encouraged.

**BACKGROUND:** Harvesting nannies usually limits long-term harvest potential, particularly in native (not introduced) goat populations. Nannies do not breed until they are 5 years old; nannies in native populations normally give birth to one kid every other year. Twinning is rare. Nannies generally live 10-12 years so, on average, a nanny will produce only 3-4 kids in her lifetime. Assuming a 50:50 sex ratio at birth and average kid survival to breeding age, a typical nanny will barely replace herself in the population. Although nannies in introduced populations tend to be more productive, this inherently low rate of productivity in native populations is why most goat populations are sensitive to nanny harvest and why long term harvest opportunity is maximized by harvesting billies.

In most units, the department manages goat populations with a guideline harvest level point system where, for every 100 adult goats counted during a survey, 6 goat points are allocated for harvest. A billy is valued at one point and a nanny is valued at two points. When the harvest point total for individual hunt areas is reached, the hunt is closed by emergency order. If only billies are harvested, six goats or roughly 6% of the count can be harvested. However, if only nannies are taken, only three goats can be harvested and productivity of the population will be reduced limiting future harvest opportunity.

Goat hunters have been required to pass the department's on-line goat quiz as a permit condition in Units 1D, 6C, and 6D for nearly a decade. In 2023 the board adopted that requirement into regulation for all goat hunts in Units 1-5. To evaluate the effect of requiring hunters to pass the quiz, we compared the percentage of nannies in the harvest for the 5 years prior to the quiz being required (RY2018-RY2022) for Units 1A, 1B, 1C, 4, and 5 with the percentage of nannies in the harvest in RY2023 and hunts to date in RY2024 (some hunts remain open). In the five years prior to the quiz being required, nannies made up 19% of the harvest in those units. From data

available for RY2023 and through November 22 in RY2024 nannies made up 13% of the harvest. More years of data are needed to better evaluate the effect of requiring the quiz.

The goat quiz has been required as a permit condition in Unit 1D since RY2016. In the first year after the quiz was required, nannies made up 46% of the harvest. However, since then, the percentage of nannies in the Unit 1D harvest has ranged from 13% - 32%.

Penalties for taking nannies may have greater influence on how selective individual hunters are when harvesting goats. In GMU 4, from RY2012-RY2016 individual goat hunt areas were closed in the year after a nanny was taken. Under that strategy, nannies accounted for just over 10% of the harvest. However, after RY2016 that practice was relaxed and the proportion of nannies in the harvest increased and has averaged about 20%.

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**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. The department can sustainably manage goat populations and harvest with or without requiring hunters to review educational material and pass a quiz. However, reducing harvest of nannies will allow greater harvest over the long term.

To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a normally diligent hunter with reasonable opportunity of success in taking a goat for subsistence uses if the proposal is adopted.

**COST ANALYSIS:** Adoption of this proposal to expand that requirement statewide would not result in additional costs for the department.

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**PROPOSAL 126– 5 AAC 92.080. Unlawful methods of taking game; exceptions.** Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide as follows:

**PROPOSED BY:** Ted Spraker

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers with a trapping license statewide.



**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.080. Unlawful methods of taking game; exceptions.** The following methods of taking game area prohibited:

...

(7) with the aid of

...

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This

proposal would allow the use of electronically enhanced night vision and forward-looking infrared devices when trapping furbearers, statewide. It would align regulations statewide which will reduce confusion for trappers that take game in the Interior-Northeast Arctic and neighboring regions, and makes it easier for enforcement.

**BACKGROUND:** At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal. While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 127 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.** Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers as follows:

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license during an open season November 1 - March 31 statewide.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.080. Unlawful methods of taking game; exceptions.** The following methods of taking game area prohibited:

...

(7) with the aid of

...

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would allow the use of night vision goggles and forward-looking infrared devices when trapping furbearers, statewide. It would align regulations statewide which will reduce confusion for trappers that take game in the Interior-Northeast Arctic and neighboring regions, and makes it easier for enforcement.

**BACKGROUND:** At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to

create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal with amendments. As written the proposal will create conflicting regulations within 5 AAC 92.080. The department recommends the board amend the proposal to change the language from “night vision goggles” to “electronically enhanced night vision” and recommends the board amend the proposal to remove the dates allowing the use of these devices to match the language adopted by the board in March 2024.

While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal, with amendments, will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 128 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.** Allow the use of night vision and thermal optics for taking furbearers as follows:

**PROPOSED BY:** Don Coatney

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the use of night vision and thermal optics for taking furbearers with a trapping license during an open season statewide.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.080. Unlawful methods of taking game; exceptions.** The following methods of taking game area prohibited:

...

(7) with the aid of

...

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would allow the use of night vision and thermal optics when trapping furbearers statewide. It would align regulations statewide which will reduce confusion for trappers that take game in the Interior-Northeast Arctic and neighboring regions and makes it easier for enforcement.

**BACKGROUND:** At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness. FLIRs are, by definition, thermal optical devices.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal with amendments to use the existing regulatory language to ease confusion which is the intent of the proposal. As written, the proposal will create conflicting regulations within 5 AAC 92.080. The department recommends the board amend the proposal to specify it allows the use of electronically enhanced night vision and forward-looking infrared devices to match the language adopted by the board in March 2024.

While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal, with amendments, will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 187 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.** Allow the use of a laser sight, electronically-enhanced, night vision, thermal, and forward-looking infrared devices for use for the taking of predators as follows:

**PROPOSED BY:** Scott Vanderlooven

**WHAT WOULD THE PROPOSAL DO?** The proposal would allow the use of electronically enhanced night vision and forward-looking infrared devices for taking predators, statewide.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.080. Unlawful methods of taking game; exceptions.** The following methods of taking game area prohibited:

...

(7) with the aid of

...

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would allow the use of night vision, thermal scopes, and artificial light for the taking of predators, statewide.

**BACKGROUND:** At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone,

goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal with amendments to use the existing regulatory language to ease confusion. As written the proposal will create conflicting regulations within 5 AAC 92.080. The department recommends the board amend the proposal to specify it allows the use of electronically enhanced night vision and forward looking infrared devices for the take of furbearers to match the language adopted by the board in March 2024.

While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal, with amendments, will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 131 – 5 AAC 92.095. Unlawful methods of taking furbearers.** Require identification tags be attached to traps and snares.

**PROPOSED BY:** Kneeland Taylor

**WHAT WOULD THE PROPOSAL DO?** This proposal will require trappers to mark, with an ID tag, all traps and snares.

**WHAT ARE THE CURRENT REGULATIONS?** There are currently no trap marking requirements in Alaska.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal will require additional effort for trappers to mark traps and snares, and may result in a nominal increase in expenses to refit traps and snares with ID tags. Adoption of this proposal will provide a method for the department and AWT to identify trappers, but members of the public have commented on concerns of trapper harassment if identifying tags are required.

**BACKGROUND:** The board previously adopted proposals to mark snares in Units 12 and 20E (2001) and all traps and snares in Units 1-5 (2003). The requirement to mark a snare was implemented in Regulatory Year (RY) 2001 for Unit 12 and 20E and in RY2003 for Units 1–5.

The requirement to mark a snare in Units 12 and 20E was originally enacted to address local enforcement issues related to snare sets left in the field following the closure of the wolf trapping season. The original proposal included a sunset clause of two years but was reinstated by the board in 2002 without the sunset because of overall positive support from local trappers and law enforcement. Wolf trapping along major roadways is common in Units 12 and 20E. When these animals are caught in sight of the road, the marking requirement has allowed the department and troopers to contact trappers before public complaints escalate.

The board adopted the requirement for marking traps and snares in Units 1-5 to address many of the same issues as identified in Interior units.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal and recommends that during regularly scheduled regional board meetings the board address area-specific issues rather than on a statewide broadscale basis. Requiring traps and snares to be marked makes enforcement easier. In the past trappers have expressed concerns that by requiring trap tags is to invite additional scrutiny to trap/snare sets resulting in human presence and scent near the sets that could impact the chances of catching furbearers. Such a regulation as proposed may be unnecessary in most of the state, and may only be appropriate in specific areas with documented issues.

**COST ANALYSIS:** Adoption of this proposal is not expected to result in additional cost to the department.

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**PROPOSAL 132 – 5 AAC 92.080. Unlawful methods of taking game, exceptions.** Prohibit nonresidents from using snowmachines to approach and pursue the take of wolves and wolverine.

**PROPOSED BY:** Rick Grant

**WHAT WOULD THE PROPOSAL DO?** The proposal would prohibit nonresidents from using snowmachines to approach and pursue wolves and wolverine in some areas.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.080. Unlawful methods of taking game, exceptions.** The following methods of taking game are prohibited:

...

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

...

(B) motorized land vehicle may be used as follows:

(i) in Units 22, 23, and 26(A), a snowmachine may be used to position a caribou, wolf, or wolverine for harvest, and caribou, wolves, or wolverines may be shot from a stationary snowmachine;

(ii) notwithstanding any other provision in this section, in the wolf control implementation areas specified in 5 AAC 92.111 - 5 AAC 92.113, 5 AAC 92.118, and 5 AAC 92.121 - 5 AAC 92.124, a snowmachine may be used to position a hunter to select an individual wolf for harvest, and wolves may be shot from a stationary snowmachine;

...

(ix) a snowmachine may be used to approach and pursue wolves and wolverine; an approach and pursuit under this sub-paragraph is not harassment under (5) of this section but may not come in contact with a live animal;

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

Nonresidents would not be able to use a snowmachine to approach and pursue wolves and wolverine except in the locations listed under 5 AAC 92.080(4)(B)(i) and (ii). This would result in nonresidents being able to use snowmachines for the take of wolves and wolverine in some places, but not all.

**BACKGROUND:** The board allows the use of snowmachines to position hunters and trappers in certain locations to take game, and the board also allows the use of snowmachines to approach and pursue wolves and wolverine to aid in the take of game statewide. There are provisions that allow this in wolf control implementation areas and also in areas of the state that are primarily large wide-open regions where approaching and successfully harvesting an animal can be quite difficult. The board initially allowed this practice in limited places, and over time slowly relaxed the prohibitions to what they are today. Regulations allowing the use of snowmachines statewide for the particular regulation in question have been in place since 2022.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it addresses methods and means and is allocative in nature (resident vs. nonresident use). Prohibiting or allowing a particular method and means of take dependent on residency may be difficult for enforcement purposes. If the board adopts this proposal it should be aware that the use of snowmachines by nonresidents will still be allowed in the places listed in 5 AAC 92.080(4)(B)(i) and (ii). The department does not collect data on how often snowmachines are used by residents or nonresidents to pursue and take game under any of these regulations.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 133 – 5 AAC 92.080. Unlawful methods of taking game, exceptions.** Prohibit the use of snowmachines to approach and pursue the take of wolverine.

**PROPOSED BY:** Rick Grant



**WHAT WOULD THE PROPOSAL DO?** The proposal would prohibit hunters and trappers from using snowmachines to approach and pursue wolverine in some areas.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 92.080. Unlawful methods of taking game, exceptions.** The following methods of taking game are prohibited:

...

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

...

(B) motorized land vehicle may be used as follows:

(i) in Units 22, 23, and 26(A), a snowmachine may be used to position a caribou, wolf, or wolverine for harvest, and caribou, wolves, or wolverines may be shot from a stationary snowmachine;

...

(ix) a snowmachine may be used to approach and pursue wolves and wolverine; an approach and pursuit under this sub-paragraph is not harassment under (5) of this section but may not come in contact with a live animal;

There is a positive customary and traditional use finding for wolverine statewide in all units with a harvestable portion, with an amount reasonably necessary for subsistence uses of 90 percent of the harvestable portion.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Hunters and trappers would not be able to use a snowmachine to approach and pursue wolves and wolverine except in the locations listed under 5 AAC 92.080(4)(B)(i), which are Units 22, 23, and 26A.

**BACKGROUND:** The board allows hunters and trappers to use snowmachines to approach and pursue wolves and wolverine statewide to aid in the take of game. There are provisions that allow this in wolf control implementation areas and also in areas of the state that are primarily large wide-open regions where approaching and successfully harvesting an animal can be quite difficult. The board initially allowed this practice in limited places, and over time slowly relaxed the prohibitions to what they are today. Regulations allowing the use of snowmachines statewide for the particular regulation in question have been in place since 2022.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it addresses methods and means; however, this proposal represents a reduction in opportunity for state residents; as such, to meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted. Title VIII of Alaska National Interests Lands Conservation Act specifically allows the use of snowmachines for subsistence purposes, so

adoption of the regulation could result in conflicting state and federal regulations, making it difficult for Alaska residents to be in compliance with the regulations. Further, if the board adopts this proposal it should be aware that the use of snowmachines will still be allowed in the places listed in 5 AAC 92.080(4)(B)(i). The department does not collect data on how often snowmachines are used by to pursue and take game under any of these regulations.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 144 – 5 AAC 92.031. Permit for selling skins, skulls, and trophies.** Shorten the minimum time period a taxidermist must wait before selling unclaimed furs, skins and trophies.

**PROPOSED BY:** Josh Livingston

**WHAT WOULD THE PROPOSAL DO?** The proposal would shorten the minimum time period a taxidermist must wait before beginning the process to allow the sale of unclaimed finished skins, and trophies from 6 months to 60 days.

**WHAT ARE THE CURRENT REGULATIONS?** **5 AAC 92.031. Permit for selling skins, skulls, and trophies.** (a) A licensed taxidermist may sell an unclaimed, finished skin or trophy under a permit issued by the department after the finished skin or trophy has been held unclaimed for six month, and after the taxidermist sends notice of intent to sell, by registered mail at least 15 days before the sale, to the last known address of the person who ordered the taxidermy work.

(b) A court appointed or duly authorized estate executor, or a referee in a bankruptcy, may sell a game skin or trophy in a bankruptcy or probate action if that person first obtains a permit from the department.

(c) Repealed 7/1/2008.

(d) Repealed 7/1/2008.

(e) Repealed 7/1/2008.

(f) A person who has obtained ownership of a big game trophy as a result of a divorce may sell that big game trophy only if that person first obtains a permit from the department after providing the department with a list of the big game trophies being sold and a divorce decree documenting ownership.

(g) A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year only after first obtaining a permit from the department. Any advertisement must include the permit number assigned by the department, and the department will permanently mark all hides and skulls intended for sale. All bears sold under this permit must be reported to the department within the time frame specified on the permit.

(h) A person may sell a lawfully harvested and prepared big game trophy if that person first obtains a permit from the department.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, taxidermists would be able to sell unclaimed finished skins and trophies four months earlier than is currently allowed.

**BACKGROUND:** In January 2006 the board shortened the waiting period from one year to six months. The justification at the time was that the six month waiting period, combined with the required notification procedures, would be sufficient to protect the interests of the trophy owner while reducing the financial burden on the taxidermist. In 2019 the department issued 4 permits to taxidermists to sell unclaimed trophies, 1 in 2020, 1 in 2021, 2 in 2022, none in 2023, and 2 in 2024.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it does not create nor address a biological issue and does not impact how resources are managed. The desired change can be implemented easily, and the current regulation is not an administrative burden.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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