

The Board of Game deferred this proposal from the Interior and Eastern Arctic Region meeting in March 2020, as amended to apply statewide. The original proposal was Proposal 110, and it applied only to Unit 19D.

PROPOSAL 120

5 AAC 92.011. Taking of game by proxy.

Allow proxy hunting for moose as follows:

Amend 5 AAC 92.011 to allow proxy hunting for any antlered bull moose.

What is the issue you would like the board to address and why? An interpretation has been made that proxy hunting is not allowed for moose in areas with an any antlered bull bag limit. Unit 19D currently has an any antlered bull bag limit so with this new interpretation proxy hunting would not be allowed in our area. However, proxy hunting is an important traditional practice in the McGrath area.

The McGrath AC was not able to meet on this issue before the proposal deadline to submit a proposal. Therefore, if they are not supportive of this proposal when they meet next fall, I will request it be withdrawn.

PROPOSED BY: Roger Seavoy, McGrath Fish & Game Advisory Committee (EG-F19-052)

PROPOSAL 131

5 AAC 92.210. Game as animal food or bait.

Allow the use of game bird wings and backs to be used for trapping bait as follows:

I recommend that bird wings of all game birds including swan, geese, and cranes including the humerus, radius and ulna, and the meat of the humerus radius and ulna be allowed for other human uses such as trapping bait statewide. The back and the meat of the back should also be used for other human uses like trapping.

What is the issue you would like the board to address and why? I would like to be able to use all bird wings and backbones from swan, cranes, and geese for trapping bait statewide. Bird wings and carcasses, including the backbone, have a long historical use for trapping, and I would like to be able to continue that use. I feel it is more appropriate to use natural baits rather than bring a bunch of trash into the wilderness like compact discs (CDs) and other shiny baubles.

PROPOSED BY: Sam Hancock

(EG-F19-152)

PROPOSAL 152

5 AAC 92.050. Required permit hunt conditions and procedures.

Require all drawing permit hunts available to residents be available for application online as follows:

Amend 5 AAC 92.050 Required permit hunt conditions and procedures to add:

(a) The following conditions and procedures for permit issuance apply to each permit hunt:

- (1) the applicant or the or the applicant's agent shall complete the application form; two hunters may apply as a party in a drawing permit hunt, and if drawn, both applicants will receive a permit; a permit application that is incomplete, or that does not include, if required, an Alaska big game hunting license number, or that contains false statement, is void; the applicant must obtain or apply for an Alaska big game hunting license before submitting a drawing permit application; **All drawing permit hunts available to resident Alaskans shall be made available for application online;** and

(A) to apply for a drawing permit hunt that requires a registered or master guide....

What is the issue you would like the board to address and why?

Resident draw permit applications not available online.

There are several resident-only draw permits in various parts of the state for moose, but you must travel to the region first to pick up a permit, typically within a limited timeframe well ahead of when the hunt occurs.

The idea behind this provision to not allow all Alaskans to apply online for a draw permit equally available to all, is to curtail opportunity for residents who may not live within that area or region by making it so expensive to fly out (and back) to another part of the state ahead of time just to pick up a permit.

This would seem contrary to the Alaska constitution in which we all should be treated equally in terms of "common use" of our wildlife resources. If a hunt is a draw-only hunt, and any Alaskan is eligible to participate, then any Alaskan should be able to apply online as with most other draw permit hunts.

PROPOSED BY: Resident Hunters of Alaska

(HQ-F20-021)

Note: The following proposal is an updated submission for Proposal #152.

PROPOSAL 239

5 AAC 92.050. Required permit hunt conditions and procedures.

Require all resident registration permit hunts be available for application online as follows:

Possible Solution: Amend 5 AAC 92.050 Required permit hunt conditions and procedures to add:

(a) The following conditions and procedures for permit issuance apply to each permit hunt:

(1) the applicant or the or the applicant's agent shall complete the application form; two hunters may apply as a party in a drawing permit hunt, and if drawn, both applicants will receive a permit; a permit application that is incomplete, or that does not include, if required, an Alaska big game hunting license number, or that contains false statement, is void; the applicant must obtain or apply for an Alaska big game hunting license before submitting a drawing permit application; **All registration permit hunts available to residents shall be made available for application online;**

What is the issue you would like the board to address and why?

Resident registration permits not available online everywhere in the state.

There are several resident registration permit hunts in various parts of the state that require travel to the region to pick up a permit, typically within a limited timeframe well ahead of when the hunt occurs. Other registration permit hunts with a limited number of permits require a trip to a local ADF&G office, where hunters often show up the night prior and camp out or stand in line awaiting a chance to pick up a permit.

The rationale behind the provision to not allow all Alaskans to apply online for a registration permit equally available to all, and to have to travel to a more remote area to pick up a permit, is to curtail opportunity for non-local residents who may not live within that area or region by making it so expensive to fly out (and back) to another part of the state ahead of time just to pick up a permit. The rationale to require hunters to pick up a limited number of registration permits at a local ADF&G office, rather than allow online applications, appears to center on an in-person first-come first-serve basis that gives priority to those willing to show up early and stand in line, or to locals who live in the area, over those who sit ready at the computer keyboard awaiting the permit application start.

If a hunt is a registration permit hunt, and any Alaskan is eligible to participate, whether permits are limited or not, then all Alaskans should be able to apply online for that hunt, just like they can for other registration permits. If the ADF&G or the Board of Game wants to give a defacto priority to local Alaskans over non-local Alaskans regarding the ability to receive a registration permit, that is no different really than the federal system that gives a priority to local federally qualified subsistence users.

The intent of this submission is to withdraw proposal #152 and replace it with this proposal which addresses registration permits, NOT draw permits.

PROPOSED BY: Resident Hunters of Alaska

(HQ-F21-011)

Statewide Regulations Proposals

PROPOSAL 163

5 AAC 92.130. Restrictions to bag limit.

5 AAC 92.010. Harvest tickets and reports.

Count wounded big game animals towards the hunter's bag limit for all units and require additional action in the field from hunters that attempt to take game as follows:

Reconstruct 5 AAC 92.130:

- [(F) IN UNITS 1 - 5 AND UNIT 8, A BLACK OR BROWN BEAR WOUNDED BY A PERSON COUNTS AGAINST THAT PERSON'S BAG LIMIT FOR THE REGULATORY YEAR IN WHICH THE BEAR IS TAKEN. HOWEVER, IN UNITS 1 - 5 AND UNIT 8, A BROWN BEAR WOUNDED BY A PERSON DOES NOT COUNT AGAINST THAT PERSON'S ONE BEAR EVERY FOUR REGULATORY YEARS BAG LIMIT ESTABLISHED IN 5 AAC 92.132.
- (G) IN UNIT 8, AN ELK WOUNDED BY A PERSON COUNTS AGAINST THAT PERSON'S BAG LIMIT FOR THE REGULATORY YEAR IN WHICH THE ELK IS TAKEN.]

To read 5 AAC 92.130:

- (f) In Units 1-26 a big game animal wounded by a person counts against that person's bag limit for the regulatory year in which the animal is taken. The wounding of an animal of any species does not prevent that person from hunting that particular species the following regulatory year.
- (g) Upon attempting to take a big game animal the hunter is obligated to inspect the surrounding area in which the animal was standing to determine if the animal was wounded. A person must use every lawful means at their disposal to bag a wounded animal while it is in danger of escaping.

Add section (m) to 5 AAC 92.010 as follows:

- (m) A hunter who wounds a big game animal and that animal is not recovered must, before leaving the field, remove the day and month from the harvest ticket or permit and lock the metal locking tag when applicable.

What is the issue you would like the board to address and why? That any wounded game be counted against the hunter's bag limit.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (HQ-F20-011)

PROPOSAL 171

5 AAC 92.450. Description of game management units.

Divide Unit 19A into two subunits as follows:

The description of the eastern boundary of **Unit 19A** will be the same description for the TM680 moose hunt in the ADF&G Hunting Regulations book.

That is – *“The Kuskokwim River drainage downstream from, and including the George River drainage, and downstream from and excluding the Downey Creek drainage.”*

The description of the western, (same), border of **Unit 19E** will be - *“The Kuskokwim River drainage upstream from, and excluding the George River drainage, and upstream from, and including the Downey Creek drainage.”*

Note: The Stony Holitna Advisory Committee submitted maps with this proposal which are available on the Board of Game proposal book webpage at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook or by contacting the ADF&G Boards Support Section at (907) 465-4046.

What is the issue you would like the board to address and why?

The division of Game Management Unit 19A into two subunits - 19A West to remain 19A and 19A East to become 19E.

Background Information:

The Tier II hunt in 19A West and the Closure in 19A East, came about in 2006, primarily because residents in the two areas had/ have fundamentally different views on moose management.

There are two Advisory Committees in 19A –

- Acting in the interests of western 19A - The Central Kuskokwim Advisory Committee (CKAC), representing five villages – Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek.
- Acting in the interests of eastern 19A - The Stony Holitna Advisory Committee (SHAC), representing four villages – Red Devil, Sleetmute, Stony River, and Lime Village.

The existence of two separate Game Management Units will simplify and facilitate wildlife management by ADF&G in each of the new subunits, particularly in regard to moose.

There are several differences between the two areas that offer compelling reasons for the division of 19A.

This following info is excepting the Lime Village Management Area, LVMA.

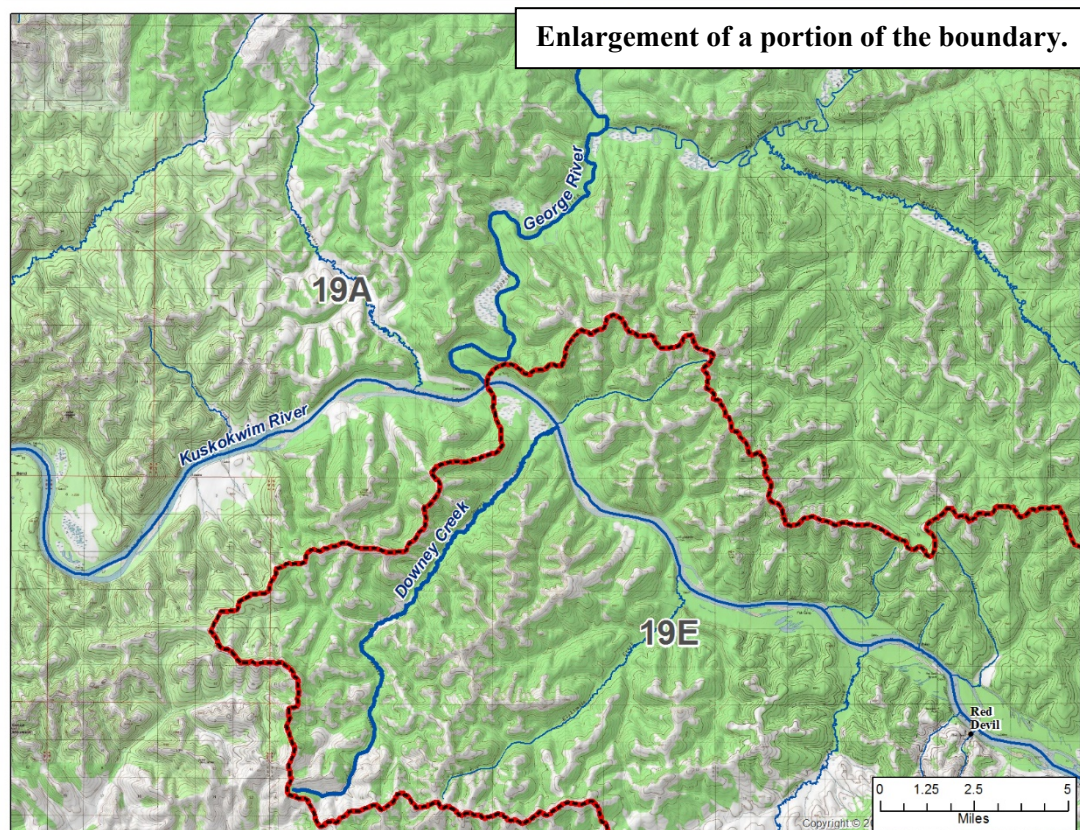
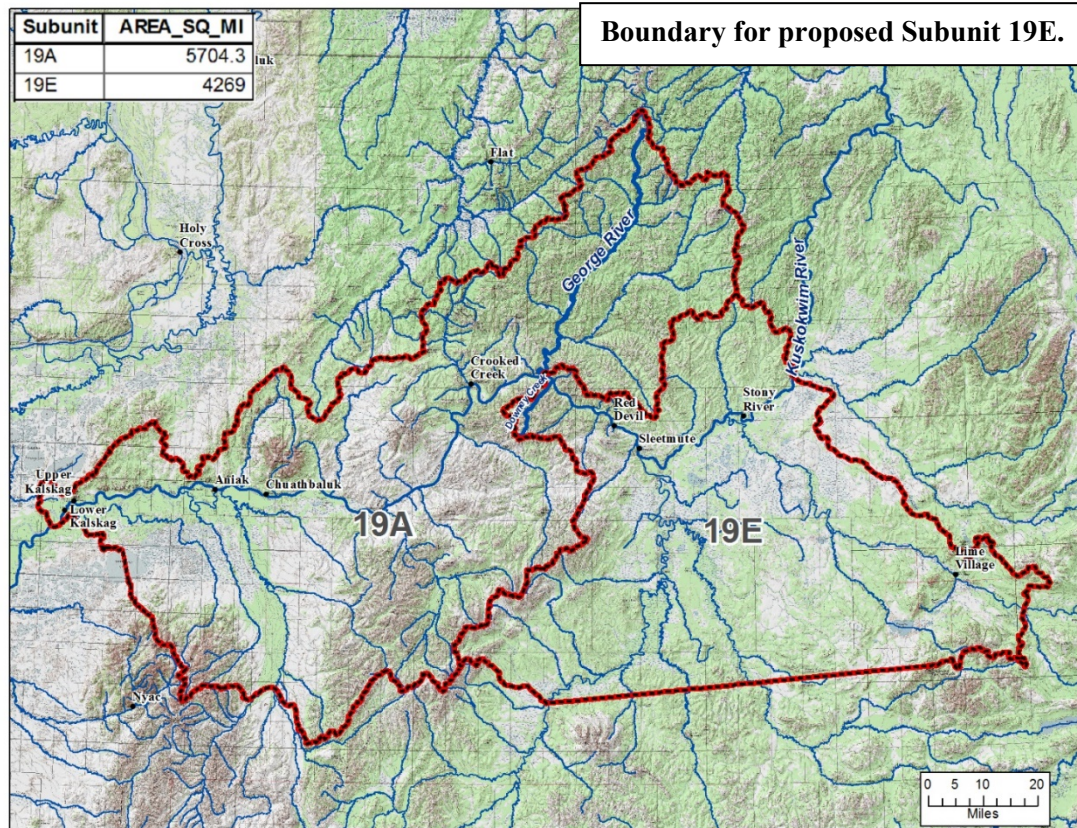
- Although all of 19A is designated as an Intensive Management Area, and qualifies for aerial wolf predator control, this program has been operational only in 19A East since 2009.
- 19A has two identified moose stocks, with two separate harvestable surpluses, which are managed separately by ADF&G.
- 19A East and West have different use patterns from each other.

- There are two separate hunts in 19A- RM682 in 19A East & TM680 in 19A West.
- SHAC and CKAC want these hunts to continue to remain separate.
- The topography of those portions of 19A that is accessible by boat is mainly heavily timbered, upland in the west, and mainly lowlands with both tundra and timber in the east.
- Land ownership is mainly federal and native corporation land in the west, and state and Native corporation land in the east, which has negatively affected the success of predator control programs, due to its prevention on both federal and Native corporation land. *In 2019, the local Native corporation board voted to allow predator control on its lands. This will contribute to the success of the two predator control programs in both 19A East and 19A West.*
- As of the March, 2020 Board of Game meeting, 19A West now has a separate predator control program

PROPOSED BY: Stony Holitna Fish and Game Advisory Committee (HQ-F20-032)

PROPOSAL 171 – Divide Unit 19A into Two Subunits

Maps submitted by the Stony Holitna Advisory Committee.



PROPOSAL 230

5 AAC 92.990(a)(30). Definitions.

Change the definition for "full-curl horn" as follows:

Change 5 AAC 92.990 "full-curl horn" of a male (ram) Dall sheep from "at least eight years of age" to "at least seven years of age" as determined by horn growth annuli.

What is the issue you would like the board to address and why? The evaluation of a legal Dall sheep ram in the field under the current full-curl rule can be a complicated and risky endeavor for many hunters. According to the Alaska Department of Fish and Game (ADF&G) *Division of Wildlife Conservation Dall's Sheep News – Research and Management Update, Winter 2017 – Why Full-Curl Management* (at the bottom of page 6), "The primary reason that the regulation eventually ended up at full curl, however, is that some influential hunters and guides wanted bigger sheep on the mountain. There has also been an ongoing, inaccurate perception that too many rams are being harvested." According to the above statement from ADF&G, this proposed change to 5 AAC 92.990 would allow hunters a little more margin of error when judging a legal ram in the field without harming Alaska's wild sheep resource.

PROPOSED BY: Philip Nuechterlein

(EG-F21-030)

PROPOSAL 245

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

Eliminate the requirement to salvage rib meat on the bone for moose, caribou, and bison as follows:

The intent of this proposal is to make the salvage requirements regarding rib meat consistent statewide for moose, caribou, and bison, notwithstanding the requirements for the community subsistence harvest permit under 5 AAC 92.220(6).

One solution would be to remove “and ribs” from 92.220(d)(3) as follows:

(d)(3) for moose taken before October 1 in Units 13, 19, 21, 23, 24, and 25 for caribou taken before October 1 in Units 13, 19, 21(A), 21(E), 23, 24, and 25(A), and for bison taken before October 1 in Units 19, 21(A), and 21(E), the edible meat of the front quarters, **and** hindquarters, [AND RIBS] must remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption.

What is the issue you would like the board to address and why? Requirement to salvage rib meat on the bone for moose and caribou in various units.

Meat on bone requirements for moose and caribou in several game management units were put into effect over concerns with meat spoilage, and in part so wildlife enforcement could better ensure salvage requirements were met. But these salvage requirements are not consistent statewide. Only Units 13, 21, 23, 24, and 25 have the requirement that the rib meat of moose and caribou (and bison) must be salvaged naturally attached to the bone.

Hunters are fully capable of salvaging the rib meat without leaving it attached to the bone, and without it spoiling, as is evident that this requirement does not apply statewide. As to identifying that the rib meat was completely salvaged, again the requirement does not apply statewide to other moose, caribou, and bison hunts in high-use areas or off the road system.

It is both difficult and cumbersome to leave rib meat attached to the bone, and we don't see the removal of this salvage requirement having any negative effects on overall meat salvage, spoilage, or on enforcement efforts. Rib meat dries out fast when attached to the bone and “rolling” or filleting the ribs is an optimum way to salvage and keep rib meat from spoiling or drying out. Many hunters on longer hunts, or when the harvest happens at the beginning of a hunt, choose to eat the rib meat in the field so the extra weight and space of the rib bones is not such a factor. Aircraft hunters would like to be able to legally remove the rib meat from the bones before loading into the airplane to save space and weight.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

(HQ-F21-008)

PROPOSAL 247

5AAC 92.110. Control of predation by wolves.

Discontinue lethal taking of wolves under predation control implementation plans as follows:

I recommend:

Non-lethal predator control only.

Discontinuation of all "Judas wolf" programs.

Full protection of all wolves in a ten mile boundary surrounding federal conservation areas, state and national parks.

Prohibition on killing of wolves, including pups, during seasons of reproduction and care of the young.

An end of all aerial hunting of wolves.

What is the issue you would like the board to address and why? The current methods used to manage wolves in Alaska, as explained in previous letters:

- **Are based on poor science and inadequate predator/prey population surveys;**
- **Are not scientifically peer reviewed;**
- **Do not recognize or protect natural variability of dynamic ecosystems;**
- **Do not account for the growing ecological impacts of climate change;**
- **Are designed for mostly urban, not rural subsistence, hunters;**
- **Are not supported by many Alaska citizens;**
- **Can result in prey populations exceeding habitat carrying capacity, thus degrading habitat;**
- **Can lead to unintended consequences, including increasing predation due to immigration of predators into control areas;**
- **Prioritize consumptive use of wildlife over non-consumptive use, contrary to the Alaska constitution; and**
- **Produce little scientific evidence that the programs are effective.**

It is time for reputable, professional wildlife scientists in ADF&G to admit such practices harm more than helping.

I urge you to do the following:

1. Discontinue all lethal programs of so-called predator control and institute only non-lethal methods.
2. Immediately discontinue and disallow "Judas wolf" programs which undermine the health of the ecosystem.

3. Directly prohibit any taking or hunting in any form of wolves within 10 miles of federal and state parks, conservation units and other protected areas. As experts and lay persons know well, the range of wolves does not necessarily adhere to government delineated boundaries, and without protections, wolves will be eliminated from areas which should be safe for them.

I am not a resident of Alaska. When I visited Alaska, I was appalled by the dominance of the "bad boy" hunter mentality in which frankly ignorant views are promoted over scientific ones, and in which torture and cruelty to valuable predators is not just tolerated but encouraged. Please work to revise your so-called predator control laws. Wolves help maintain a healthy ecosystem and lead to better prey hunting for those who choose to do so, not worse. Let science and not ignorance prevail. You have the power to make the change.

Sincerely, Lydia Furman MD

Member of Alaska Wildlife Alliance

PROPOSED BY: Lydia Furman

(EG-F21-022)

PROPOSAL 254

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

Reauthorize a winter any-moose season during February in a portion of Unit 19D as follows:

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

...

Unit 19(D) that portion upstream
from the Selatna River, excluding
the Black River

RESIDENT HUNTERS:

...

1 moose, by registration permit
only, a person may not take a cow
accompanied by a calf

Feb 1 – Last day of Feb.

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The moose population in Unit 19D East has approximately doubled since predator removals began in 2003. The Alaska Department of Fish and Game (ADF&G) is observing decreasing nutritional status as indicated by declining twinning rates. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. By 2020 ratios had declined again and the two-year average was 17 bulls per 100 cows.

To maintain a healthy and productive moose population, ADF&G research (Boertje et al. 2007) indicates that when the 2-year average twinning rate is 11–20% populations should be stabilized. Twinning rates in Unit 19D East remained high until 2015; however, the current 2-year average twinning rate is now 17%, indicating a decreasing nutritional status in this population. The current Intensive Management plan for Unit 19D East calls for stabilization of the population through harvest when the two-year average twinning rate is between 15 and 20%.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F21-030)

PROPOSAL 259

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during part of February and March in Unit 21E as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
...		
Unit 21(E)		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, a person may not take a cow accompanied by a calf ...	Feb 15 – Mar 15	

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

This moose population is beginning to show signs of nutritional stress. The most current survey in 2019 indicated there are 9,777 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000–11,000 moose. There is currently a harvestable surplus of 390 moose; however, approximately 200 moose are harvested each year and there are additional moose available to harvest. Bull-to-cow ratios are high, with 42 bulls per 100 cows in 2018. The Intensive Management (IM) harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 2.1 moose/mi² in 2019. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. The two-year average twinning rate in the Holy Cross area is 19%, while north of Anvik and Shageluk (where moose density is lower) the twinning rate is 32%. The current intensive management plan calls for stabilizing the population through harvest when the two-year average twinning rate is 15–20%. Browse utilization is high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure and allow access to areas inaccessible in the fall.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F21-035)

PROPOSAL 261

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

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska as follows:

- (a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

...

What is the issue you would like the board to address and why? Brown bear tag fee exemptions must be reauthorized annually. Reauthorizing the exemption allows residents who have not purchased the \$25 brown bear tag to take bears opportunistically. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically.

Region III (Interior and Northeast Alaska) brown bear populations are healthy, and harvest is monitored through the brown bear sealing requirement. Reauthorizing all resident brown bear tag fees throughout Region III maintains simpler regulations, high resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization includes tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

The Alaska Department of Fish and Game estimates that brown bear harvest accounts for less than 6% of the bear population. Harvest is composed primarily of males and is sustainable. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed by adjusting seasons and bag limits. The resident tag fees that were in place prior to 2010 appeared to have little effect on harvest rates in these areas.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F21-036)

Note: Proposal 267 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2022.

PROPOSAL 267

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

Limit or restrict all nonresident sheep hunting in Unit 19C as follows:

Limit or restrict all nonresident sheep hunting in Unit 19C. Our preferred option would be for all current nonresident sheep hunting in Unit 19C to go to draw only, with a limited allocation of not more than 30 permits. With continuing sheep declines and high nonresident harvests, this would be a far better solution than going to draw only for everyone down the line – which is very likely if sheep don't rebound – and a subsequent draw only hunt for all with a 10 percent nonresident allocation of permits.

The Board of Game (board) really should have a framework in place so that before any resident sheep hunting opportunities can be limited or restricted; if nonresident hunting is allowed, then that component should always be addressed first. That didn't happen in Units 13D/14A in the Chugach when we had similar issues and conservation concerns. That didn't happen in Unit 19C in 2020 when the Department of Fish and Game (department) closed the subsistence sheep season.

What is the issue you would like the board to address and why? Continued sheep declines in Unit 19C, unlimited nonresident opportunity and increasing nonresident harvests.

The department had conservation concerns for the Unit 19C sheep population in 2020, enough so that the RC380 subsistence sheep hunt in the unit was canceled. No trend counts were able to be conducted in 2020 or 2021, but reports from guides and hunters in 2021, and department observations, show that the situation has not improved and in fact is likely worse .

The 2021 RC380 subsistence sheep hunt will nearly be eliminated, with no ewes allowed to be taken and a reduced quota of only two rams less than $\frac{3}{4}$ curl.

Customary and traditional subsistence sheep hunting opportunities in Unit 19C were denied in 2020 and severely curtailed in 2021 over sheep conservation concerns, yet unlimited nonresident sheep hunting opportunities are still being allowed.

We are greatly concerned that a continued delay to address severe sheep declines in Unit 19C will lead to the area going draw only for all, or an emergency action by the department restricting sheep hunting for all, when the hunters taking the vast majority of the sheep harvest each year are nonresident hunters. Continued unlimited sheep hunting opportunity in Unit 19C, along with unlimited number of guides in the unit, has gone on too long and needs to be addressed before resident sheep hunting opportunities are limited or restricted. The same is true on the subsistence side when the department restricts subsistence sheep hunting opportunities because of ongoing sheep conservation concerns in Unit 19C. The current dynamics with the sheep population and unlimited nonresident sheep hunting opportunity is not beneficial to any group, including guides and their nonresident clients.

The unanticipated postponement by a year of in-cycle board meetings due to the ongoing pandemic has further pushed this issue to the Region III (Interior Eastern Arctic Region) 2024 meeting. Continuing to wait until the in-cycle regional meeting to address this issue could lead to all resident hunters losing opportunities should the sheep population continue to decline. The board should address this issue at one of the 2022 regulatory meetings.

The board considered a similar ACR in 2020 submitted by a longtime guide in Unit 19C who relayed that he'd witnessed severe sheep declines and requested that all sheep hunting in Unit 19C (for both residents and nonresidents) be restricted for two years. At that 2020 ACR meeting, the board heard testimony from the department in which sheep data was presented showing that "a likely decline of 40% to 60% has occurred in 19C." The department also canceled the 2020 RC380 subsistence sheep hunt in Unit 19C due to conservation concerns. That ACR was voted down 2-5.

The new information is that in Unit 19C (and statewide), sheep numbers are even lower and less legal rams were available in 2021. Also, the percentage of sub-legal sheep that went through the Anchorage office in 2021 was >10 percent, with sub-legal take evenly split between guided and unguided hunters.

Some of the declines and less available full-curl rams in 2021 can be attributed to previous bad winters and low recruitment, but overall we are seeing different weather patterns and warmer, wetter winters that will exacerbate declines and lead to decreased sheep habitat.

Since 2016, Resident Hunters of Alaska (RHAK) has submitted proposals to the board regarding conservation concerns for the Unit 19C sheep population and continued unlimited nonresident sheep hunting and harvests in Unit 19C. The vast majority of sheep harvests in Unit 19C are from nonresident guided hunters, and with continued sheep declines in the unit the percentage of nonresident harvests has only increased. In 2021, preliminary data for Unit 19C is that there were a total of 97 sheep hunters, 58 nonresident, and 39 resident. Total sheep hunters overall in Unit 19C continues to decline, which correlates with decreased involvement due to sheep hunters recognizing poor sheep population dynamics. **Nonresident sheep hunters accounted for 60 percent of total sheep hunters in Unit 19C in 2021 and took 85 percent of the total harvest.** (See department data below). There are no limits on guides in Unit 19C or nonresident hunters required to hire a guide. This same scenario of unlimited guides and nonresident hunters led to the loss of general hunting opportunity for all in the Chugach in 2009. This has been our concern all along, that the board would wait too long to impose limits on nonresident hunters, until the situation became more concerning and it went to draw only for all, with residents again losing opportunity when resident hunting was far and away much less of an impact on sheep harvests.

RHAK fully understands that the root of these sheep declines in Unit 19C and elsewhere across the state are the result of changing weather patterns and bad winter conditions, avalanches, drownings, predation etc. We have no real means to control non-human predation, as sheep are not included in our Intensive Management species. The main non-human predators of sheep are golden eagles, which are federally protected. **The one thing we can control, however, is the human component.**

To be clear, we are not intimating that limiting nonresident sheep hunters in Unit 19C will somehow lead to increased sheep populations. In other areas with longstanding draw-only sheep

hunting opportunities with limited allocations for all, sheep populations have declined. Available tags are being decreased due to conservation concerns or meeting the management goals.

What we are saying, is that limiting nonresident opportunity now will lead to less sheep mortality overall and help prevent the loss of resident sheep hunting opportunities down the line (including subsistence sheep hunts) should the sheep population not rebound.

We recognize that the management strategy for Unit 19C is to provide maximum sheep hunting opportunity, given the department's continued position that the full-curl management regime is sustainable in areas where unlimited sheep hunting opportunity is allowed. But in other units with the same management strategy, sheep hunts have gone to draw only because of sheep conservation concerns. It isn't at all far-fetched to believe the same could happen in Unit 19C. Continued unlimited nonresident sheep hunting opportunity and increasing nonresident harvests in Unit 19C should be addressed now.

ADF&G Data 19 C sheep harvests 2017-2021 (*2021 data is preliminary)

	N	R	Total killed
2017	61	46	107
2018	79	39	118
2019	75	39	114
2020	53	14	67
2021	33	6	39

(*Total # of sheep hunters in 2021 was 97, with 58 nonresident and 39 resident)

PROPOSED BY: Resident Hunters of Alaska

(HQ-F21-ACR4)

The Board of Game generated this board proposal during the January 2022 Central & Southwest Region meeting and scheduled it for consideration at the March 2022 Statewide Regulations meeting.

PROPOSAL 271

5 AAC 92.990. Definitions.

Establish a definition for “position” as it applies to using a snowmachine to take game as follows:

For purposes of 5 AAC 92.080(4)(B), “position” means a snowmachine may be used to approach within 300 yards of individual game at speeds under 15 miles per hour, in a manner that does not involve repeated approaches or that causes the game to run. A snowmachine may not be used to contact an animal or to pursue fleeing game and may not be used to molest game.

What is the issue you would like the board to address and why? This definition would align with the determination made by the Board of Game in 2018 and would more closely align with hunting on federal lands for federally qualified users. The state regulation uses different language for different areas regarding whether it is allowed to position a hunter or position an animal for harvest, and this definition would apply to all activities statewide.

The intent is to provide clearer direction to hunters regarding use of snowmachines while hunting, and to help the Alaska Wildlife Troopers distinguish between allowable positioning as compared to prohibited “driving, herding, or molesting game” with the use of a motorized vehicle (5 AAC 92.080(5)).

The current regulation, including the amendment to allow snowmachines to position wolves and wolverine for harvest in Unit 17 is:

5 AAC 92.080 Unlawful methods of taking game; exceptions.

....

(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;

(iii) notwithstanding any other provision in this section, in Units 9(B), 9(C), 9(E), 17, 18, 19, 21, 22, 24, 25(C) and 25(D), except on any National Park Service or National Wildlife Refuge lands not approved by the federal agencies, 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;

(iv) notwithstanding any other provision in this section, in the bear 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 bear for harvest, and bears may be shot from a stationary snowmachine;

(v) notwithstanding any other provision in this section, in Units 9(B), 9(C), 9(E), 17, 22 and 25(C), except on any National Park Service or National Wildlife Refuge lands not approved by the federal agencies, an ATV may be used to position a hunter to select an individual wolf for harvest, and wolves may be shot from a stationary ATV;

(vi) under authority of a permit issued by the department;

(vii) in Units 17 and 18, a snowmachine may be used to position a wolf or wolverine for harvest, and wolves or wolverines may be shot from a stationary snowmachine;

(viii) in Unit 17, a snowmachine may be used to assist in the taking of a caribou and caribou may be shot from a stationary snowmachine. "Assist in the taking of a caribou" means a snowmachine may be used to approach within 300 yards of a caribou at speeds under 15 miles per hour, in a manner that does not involve repeated approaches or that causes a caribou to run. A snowmachine may not be used to contact an animal or to pursue a fleeing caribou.

PROPOSED BY: Alaska Board of Game

(HQ-BGP-01)
