

Glennallen Area – Units 11 & 13

PROPOSAL 58 - 5 AAC 92.110. Control of predation by wolves. Change the wolf population trigger for intensive management in Unit 13 as follows:

The present wolf population Intensive Management (IM) trigger should be closer to the mid-point of the population range. The wolf population count that triggers IM shut-off should be confined to the IM area, not unit-wide. Wolves counted in Unit 13D rarely, if ever, range into the IM area.

Our committee favors a "pulse management" protocol that would control the predator population closer to the mid-point of their population range rather than at the low end of it. The population number of 135 wolves is acceptable to us as long as the count was contained within the IM boundaries. Wolf population is not a stand-alone item. Predator populations must be tied to the health of their prey species.

What is the issue you would like the board to address and why? The IM program for Unit 13. This program needs a reliable base based on the best data available. Low wolf numbers in Unit 13 are not necessarily a positive. Our advisory committee feels that a certain number of predators are necessary for the health of the ecosystem. Increasing coyote numbers and ravens abandoning traditional habitat are two of the more obvious indicators that something may be amiss. While neither of these two things may be cause for alarm in themselves they are a sign that something has changed the local balance. The current IM triggers at the extreme high end of the moose population or the very low end of the wolf population. The present wolf population in the central portion of Unit 13 is extremely low.

We feel that a few more predators are necessary to keep the health of the moose population. This IM proposal is tied to the overall population objective of the moose population, especially in Unit 13B. An indicator of moose population health is the recent drop in twinning rates to under the 20% threshold.

PROPOSED BY: Paxson Fish and Game Advisory Committee (EG-C14-202)

PROPOSAL 59 - 5 AAC 92.108. Identified big game prey populations and objectives. Reduce the population and harvest objectives for moose in Unit 13B as follows:

Our advisory committee recommends a population objective of 4000-5000 moose (presently 5000-6300) for Unit 13B. Our harvest objective, (once in that range) would be 240-280 (presently 310-620).

What is the issue you would like the board to address and why? Unit 13B has a population estimate of 1.7 moose per square mile. That number is too high to support over the long term. The deep snow of 2012-13 and the badly crusted conditions of 2013-14 have strained carrying capacities of winter browse in many areas. An indication of moose population near its peak is

twinning rates below 20%. Unit 13B is there now. Our committee has been aware of this issue for several years and has suggested solutions. We are now at a critical point. We believe that current ongoing habitat studies by ADF&G will bear out our observations. The potential for a population crash is very real (as in 1970-71 and 1971-72).

PROPOSED BY: Paxson Fish and Game Advisory Committee (EG-C14-203)

PROPOSAL 60 - 5 AAC 84.045. Hunting seasons and bag limits for moose. Reauthorize the antlerless moose drawing permit hunts in Unit 13 as follows:

Units and Bag Limits (11)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 13 1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf	Oct. 1 – Oct. 31 Mar. 1 – Mar. 31 (General hunt only)	No open season
...		

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the board. This regulation allows hunters to take a limited number of cows in specific areas to keep the population within objectives.

This Unit 13 antlerless hunt was initially adopted in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. Ten permits were issued for a western portion of Unit 13A, and four cow moose were harvested. In regulatory year 2013, ten permits will be issued for the same area with an October and March season based on new season dates adopted by the board in February 2013.

Moose in Unit 13 have generally increased at a rate of 3-5% per year in the intensive wolf management area during the past ten years. The population objective for Unit 13A is 3,500 – 4,200; the population estimate was 3,530 moose in 2009, 3,490 in 2010, and 3,890 in 2011. These numbers are based on conservative extrapolation of count area data and estimates of sightability.

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

Based on this analysis, we intend to continue offering a limited antlerless hunt in portions of Unit 13A. No additional antlerless opportunities in other portions of Unit 13 are recommended at this time.

If this antlerless moose hunting opportunity is not reauthorized in Unit 13, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, Advisory Committees, and the board.

PROPOSED BY: Alaska Department of Fish and Game (EG-C14-337)

PROPOSAL 61 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Unit 13D moose drawing hunts (DM335-DM339) to registration hunts as follows:

Propose to have drawing permits DM335-DM339 reallocated to registration permits.

What is the issue you would like the board to address and why? The participation and harvest in moose drawing hunts DM335-DM339 have been very low since these areas have been put on a drawing permit.

PROPOSED BY: Clint Mayeur (EG-C14-225)

PROPOSAL 62 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a nonresident caribou drawing hunt in Unit 13 as follows:

The new regulation would say that in Unit 13, 100 (or whatever management number works best) caribou tags will be allowed by drawing only.

What is the issue you would like the board to address and why? With the additional tags and the strength of the Nelchina caribou herd, it would be beneficial to add nonresident caribou drawing tags for Unit 13. It is doubtful that the current system will harvest enough caribou to meet their management goal. Allowing even 100 nonresident Unit 13 caribou tags would not adversely affect the herd, but would be a huge boost to local services providers in the unit. Additional revenue from people applying for tags and additional opportunities for guides would be made. If nothing is done, nonresidents will continue to be locked out of hunting Nelchina caribou. It will improve herd quality by managing the herd to its management goals. The only

suffering will be by the 100 nonresident tags that won't go to a resident. I doubt we are seeing a 60% hunt rate by folks who draw the caribou tags anyhow.

PROPOSED BY: Claude Bondy (EG-C14-250)

PROPOSAL 63 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Limit the drawing permits for caribou (DC480-483) to two permits per household as follows:

Recommend drawing permits for Nelchina caribou be limited to two permits per household (DC 480-DC483).

What is the issue you would like the board to address and why? This is a limited resource with other resources available; limiting the number of permits to two per household will provide increased opportunity for hunting as there will be more permits available. Some households will continue to receive multiple permits and fewer permits will be available for other hunters desiring an opportunity to hunt. More hunters will have an opportunity to provide meat for their families.

In an effort to be fair and increase opportunity I considered one permit per household. In reviewing permits awarded it appears that some households have received as many as five permits and I believe this is excessive since the resource is so limited and there are other species available to hunt. I settled on two as a fair number per household.

PROPOSED BY: David Luke (EG083112723)

PROPOSAL 64 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Divide the resident fall caribou hunt (RC566) into late and early seasons as follows:

Split the existing RC566 fall hunt (August 10-September 20) into early and late seasons (August 10-31 and September 1-20) and divide the harvest quota evenly between these two fall seasons. If the harvest quota is not met during either fall season, the winter season (October 21-March 31) will be open to all RC566 applicants until the quota is filled. Making hunters choose between an early or late fall season during the application period will spread the harvest out in time and space and alleviate a mad dash concentration of hunters in August at higher elevations and provide equal opportunity to those who can only hunt in September or at lower elevations.

One caribou by permit per household RC566 August 10-August 31
available only by application. October 21-March 31

or

One caribou by permit per household RC567 September 1-September 20
available only by application. October 21-March 31

or

One caribou by permit per household CC001 Aug 10-Sep 20

available only by application. October 21-March 31

or

One caribou by permit DC480-483 August 10-September 20

What is the issue you would like the board to address and why? The bulk of the Unit 13 caribou herd is at higher elevations in the early season and usually does not migrate to lower elevations until September. When the Unit 13 caribou harvest quota is low (<2,000), the fall hunts (RC566, CC001, and DC480-483) are likely to close early, favoring early season hunters and those who can access higher elevations. During recent years, hunting Unit 13 caribou during September has not been a problem because the quotas were relatively large, but now that RC566 has become a popular hunt, there is more hunting pressure in the early season, and thus more potential to close early and deny those that can only hunt in September or at lower elevations the opportunity to hunt. Considering that RC566 applicants are not allowed to hunt in other units, this bias toward early season and high elevation hunters seems unnecessary and unfair.

PROPOSED BY: George Esslinger

(EG-C14-304)

PROPOSAL 65 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Bring the community subsistence harvest (CSH) season and general season hunts into closer alignment as follows:

Bring the community subsistence harvest season and general hunt seasons into closer alignment, provided that there is still some extended season for the community subsistence hunt as follows:

What is the issue you would like the board to address and why? CSH participation in the moose hunt increased dramatically from one group (246 households) in 2009 to 45 groups (995 households) in 2013, with a slight decline to 43 groups (910 households) in 2014. This increase in participation in the CSH has caused concerns that the original intent of the CSH program is not being met. Approximately one-third of the CSH participants hunt moose each year (841 CSH hunters in 2013) and compete for the limited “any bull” quota. The increasing number of CSH hunters has resulted in conflicts within the program, as the more hunters participate, the less chance each hunter has to take one of the 100 “any bulls” in the quota. Reducing the early start for the CSH hunt would be expected to reduce the impacts that have been experienced due to increasing participation in the CSH.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is

available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of the April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 6 Nay – 5 (one member absent)

(NOTE: The committee initially considered a version of this proposal that would have set both seasons and bag limits for the community subsistence hunt for moose to match the general hunt. During consideration by the committee, the proposal was substantially amended to eliminate the words “and bag limits”, resulting in no change to the “any bull” provision of the current CSH program regulations. It was also amended to acknowledge that the board may want to bring the CSH and general hunt seasons into closer alignment, but recommends that there continue to be some extended CSH season.)

Key Points in Discussion:

In Support

- The intent of this recommendation is to acknowledge that the Board of Game may wish to shorten the extended Copper Basin CSH season to reduce the attraction to the CSH hunt and to address equity concerns expressed by other hunters. However, if the seasons are brought into closer alignment, the majority of the Committee recommends that the board provide some extended season for the CSH, to meet the intent to provide meat for communities’ subsistence needs.
- One Committee member preferred staggered hunt starts, rather than having multiple types of hunts start on the same day.

In Opposition

- Setting the CSH hunt start date to match the general hunt season start would make access to the resource more equitable and would also reduce the attraction of participants to the CSH.
- Prefer CSH season start to match general hunt season (September 1) to avoid potential for meat waste during warmer weather.
- One member expressed concern that the early start and ability to harvest “any bull” seems to have caused reduction in bulls in Unit 13, per his observations during the season. (In response, the department indicated that if the bull:cow ratio was at risk due to the “any bull” hunt, it would bring a proposal to the board to change it.)

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-274)

PROPOSAL 66 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Require participants in the community subsistence harvest (CSH) program to commit to participation for a period of two years or more as follows:

5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

...

(c) (1) (F) in the community harvest hunt area described in 5 AAC 92.074(d), participants in the community harvest permit must commit to participation for a period of two years or more.

What is the issue you would like the board to address and why? CSH participation in the moose hunt increased dramatically from one group (246 households) in 2009 to 45 groups (995 households) in 2013, with a slight decline to 43 groups (910 households) in 2014. This increase in participation in the CSH has caused concerns that the original intent of the CSH program is not being met. Approximately one-third of the CSH participants hunt moose each year (841 CSH hunters in 2013) and compete for the limited “any bull” quota. The increasing number of CSH hunters has resulted in conflicts within the program, as the more hunters participate, the less chance each hunter has to take one of the 100 “any bulls” in the quota.

Requiring participants to commit to the terms of the CSH for two or more years, including the regulatory requirement under 5 AAC 92.072(2)(A) that they “may not hold a harvest ticket or other state hunt permit for the same species where the bag limit is the same or for fewer animals during the same regulatory year”, may reduce the participation of hunters who may typically hunt along a road system and could readily hunt in other units. This could have the effect of reducing the impacts that have been experienced due to increasing participation in the CSH.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 6 Nay – 4 (two members absent)

Key Points in Discussion

In Support

- Support the requirement for a longer-term commitment, since establishing and maintaining a long-term pattern of subsistence use is key element of the Board of Game findings relevant to this CSH.
- Noted that if the board were interested in requiring a longer-term commitment to the CSH, implementation details would need to be crafted. For example, exceptions may be needed for specific situations that prevent participation (such as health problems or a change in the head of household) and appeal procedures would be needed.
- Suggested that if a community or group, or an individual within the group, decided to not fulfill the multi-year commitment, that party could not come back into the CSH during that time period, but could participate in the Tier I hunt.

In Opposition

- Concerns that this requirement would be very difficult to implement. For example, if a community or group decided after one year that it no longer wanted to participate in the CSH, how would they be held to the two-year commitment? What if just some individuals in a group were unwilling or unable to fulfill the two-year commitment? What would be the penalty and the mechanism for applying it?
- Concern that if animal populations decline and opportunity for a successful harvest is restricted or reduced in the CSH area, CSH participants could face a season or more without access to moose or caribou.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-275)

PROPOSAL 67 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Limit the areas where community subsistence harvest (CSH) hunters may hunt outside of Unit 11, 12 and 13 as follows:

Any member of a Unit 11, 12, or 13 moose and/or caribou community subsistence hunt group shall only hunt for caribou and moose in the aforesaid unit(s) for a period of two years, and shall not be eligible to hunt these species in other parts of the state during the two year period.

What is the issue you would like the board to address and why? These units include some of the most accessible hunting areas of the state. All of the trail systems have seen an increase in traffic because of regulatory provisions such as requiring Tier I caribou hunters to only hunt moose in Unit 13. In addition the popularity of the community subsistence harvest hunts has also increased. This is designed to reduce increasing demand for the CSH permits.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the

Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 6 Nay – 4 (two members absent)

Key Points in Discussion

In Support

- Changing the requirement to “25 or more households” would make it more likely that CSH groups represent the subsistence use pattern identified in the board’s findings. This change would increase the size of CSH groups, but may reduce the total number of groups and participants and lessen the impacts that have been associated with increasing participation.

In Opposition

- Do not support efforts to reduce participation by individuals, families and social groups that meet the board’s findings (2011-184-BOG) for participation in the Copper Basin CSH. Concerned that the change to 25 or more households would discourage or hinder their participation in the CSH. Also concerned that others in a household are prevented from hunting elsewhere

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-277)

PROPOSAL 69 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Include “individuals, households, or families” (recognized as a subsistence use pattern in the 2011 Board of Game Findings) in the moose subsistence hunt when the harvestable surplus exceeds the Amount Necessary for Subsistence (ANS), and change the hunt start date to September 1 (from August 10) as follows.

5 AAC 85.045(a)(11): 1 moose per regulatory year, only as follows:

RESIDENT HUNTERS:

One bull per harvest report by community harvest

[AUG 10] **Sept. 1**
Sept. 20 (Subsistence hunt only)

Permit [ONLY], **individual, household, or family:** however, no more than 100 bulls that do not meet antler restrictions for other resident hunts in the same area may be taken in Unit 13

What is the issue you would like the board to address and why? Findings of the Alaska Board of Game, 2011-184-BOG; Game Management Unit 13, Caribou and Moose Uses, identify two specific patterns of subsistence uses of moose.

(www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/findings/11-184-bog.pdf.)

“One pattern of communities of indigenous Athna Athabaskan inhabitants of the Copper River basin and another subsistence use pattern developed as individuals, families, and other social groups, both within and outside the local area, adapted to changing economic, demographic, and cultural conditions related to harvesting moose in Unit 13”.

As long as the harvestable surplus of moose is above the maximum number necessary to meet subsistence uses the subsistence hunt is regulated under AS16.05.258(b)(1-2). There is no legal authority to differentiate among subsistence users at this harvest level. The board must legally accommodate all subsistence use patterns.

Legally the board may only differentiate between subsistence use patterns when the harvestable surplus falls below the minimum amount reasonably necessary for subsistence (ANS), AS 16.05.258(b)(4). Should the board choose to give a priority to the community based subsistence use pattern in GMU13 for moose they are legally allowed to do so only when the harvest falls below the number necessary to meet the minimum ANS.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: **Failed**
 Yea – 5 **Nay – 6** **(one member absent)**

Key Points in Discussion

In Support

- This change would include all of the subsistence users referenced in the 2006 and 2011 Board Findings that describe parties eligible to participate in the CSH. Noted, however, that the Committee unanimously recommended adoption of proposal I-E, which also addresses this purpose.

- Some Committee members support changing the start date for the CSH to September 1, to match the general hunt.

In Opposition

- Some Committee members oppose changing the start date for the CSH to September 1, noting the merits of having an extended season for this hunt. (See also Proposal [65]).
- The rationale for this proposal indicates that the Board of Game can only differentiate among uses when the ANS is not being met. One Committee member stated that they did not support the proposal because they believe that the board does have authority to recognize specific uses, even when the harvestable surplus is above the ANS.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-279)

PROPOSAL 70 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Provide definitions for “community” and “individuals, families, or “other social groups” as follows:

Add definitions of the terms “community” and “individuals, families or other social groups” to the community subsistence harvest (CSH) regulations, both of which are recognized subsistence use patterns in Board of Game Findings #2006-170-BOG and #2011-184-BOG.

What is the issue you would like the board to address and why? Provide definitions in regulation that would ensure participants meet the intent of the Board of Game Findings relevant to the community subsistence hunts for caribou and moose in the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: **Passed**
 Yea – 10 Nay– 0 (two members absent)

(NOTE: The committee initially considered a version of this proposal that recommended only adding a definition of “community,” referenced in the 2006 Board of Game Findings. They reached unanimous agreement to recommend adding definitions as well of “individuals, families, and other social groups” as referenced in the 2011 board findings. Noted that ADF&G would provide options for definitions for the board’s consideration, but that it would be the board’s decision which definition(s) would be added to regulation.

Key Points in Discussion

In Support

- Unanimous support for providing these definitions for terms used in the Board of Game Findings to define the two patterns of subsistence use.

PROPOSED BY: Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-278)

PROPOSAL 71 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Implement a system to ensure communities or groups approved to participate in the moose and caribou community subsistence harvest (CSH) program meet the intent of the Board of Game findings for the program as follows:

Implement a reporting and point system for helping communities and groups make efforts to observe the Alaska Board of Game’s (board’s) customary and traditional use pattern found for the community subsistence hunts for caribou and moose in the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area, as follows:

92.072 (c)(1)(D) make efforts to ensure that the applicable customary and traditional use pattern described by the board and included by the department as a permit condition, if any, is observed by subscribers including meat sharing...

(E) In accordance with the provisions of this subsection, the department may require written reports from administrators of and participants in Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area community harvest permit hunts which describe efforts by households to observe the customary and traditional use pattern described by board findings for the game population(s) to be hunted under the conditions of this community harvest permit.

(i) The department will evaluate each report submitted under (E), and will measure compliance of the communities or groups formed under 5 AAC 92.072(c) with the customary and traditional use pattern of the game population(s), as follows:

(1) Element 1, participation in a long-term, consistent pattern of noncommercial taking, use, and reliance on the game population, may provide up to 12.5% of available points as measured by the following indicators: the number of years of taking and use of the game population;

and involvement of multiple generations in the taking and use of the game population; and use of areas other than the community subsistence hunt area for harvest activities; and

(2) Element 2, participation in the pattern of taking or use of the game population that follows a seasonal use pattern of harvest effort in the hunt area, may provide up to 12.5% of available points as measured by the following indicator: the months and/or seasons in which noncommercial harvest activities occur in the hunt area; and

(3) Element 3, participation in a pattern of taking or use of wild resources in the hunt area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, may provide up to 12.5% of available points as measured by the following indicators: costs associated with harvests; and methods used to reduce costs and improve efficiency of harvest; and number of species harvested during hunting activities; and

(4) Element 4, participation in a pattern of taking or use of wild resources that occurs in the hunt area due to close ties to the area, may provide up to 12.5% of available points as measured by the following indicators: number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and variety of harvesting activities that take place in the hunt area; and evidence of other areas used for harvest activities; and

(5) Element 5, use of means of processing and preserving wild resources from the hunt area that have been traditionally been used by past generations, may provide up to 12.5% of available points as measured by the following indicators: complete listing of the parts of the harvested game that are used; and preservation methods of that game; and types of foods and other products produced from that harvest; and

(6) Element 6, participation in a pattern of taking or use of wild resources from the hunt area that includes the handing down of knowledge of hunting skills, values, and lore about the hunt area from generation to generation, may provide up to 12.5% of available points as measured by the following indicators: involvement of multiple generations in the taking and use of the game population; and evidence of instruction and training; and

(7) Element 7, participation in a pattern of taking of wild resources from the hunt area in which the harvest is shared throughout the community, may provide up to 12.5% of available points as measured by the following indicators: amount of harvest of the game population that is shared; and evidence of a communal sharing event; and support of those in need through sharing of the harvest of the game population; and

(8) Element 8, participation in a pattern that includes taking, use, and reliance on a wide variety of wild resources from the hunt area, may provide up to 12.5% of available points as measured by the following indicators: the

variety of resource harvest activities engaged in within the hunt area; and evidence of other areas used for harvest activities.

(ii) failure to report under this subsection, or under 5 AAC 92.072(f), will result in denial to a household of a Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area community subsistence harvest permit.

[E](F) beginning July 1, 2014, in the community harvest hunt area...

What is the issue you would like the board to address and why? The goal of the annual report evaluation process - as outlined in this proposal, the draft questionnaires, and in the draft scoring system (presented at the March 7, 2014 committee meeting) - is to provide feedback to communities and groups regarding their efforts to observe the customary and traditional use (C&T) pattern described in board finding 2006-170-BOG.

Efforts to observe the pattern are required by 5 AAC 92.072 and by the board. As background, during the December 2013 meeting of the board's Copper Basin Area Subsistence Hunting Committee, ADF&G was asked to investigate methods to better assess if households with a Copper Basin community subsistence hunt permit were observing (or were making attempts to observe) the C&T pattern described in 2006-170-BOG. In response, the department developed a draft questionnaire and scoring system that hunt administrators and participating households would be required to submit after the caribou and moose hunting seasons. The committee discussed the questionnaire and scoring system during its meetings on March 7, 2014, and April 18, 2014, and requested the concept in a draft proposal for consideration to forward to the board.

The draft proposal outlines how each element in the board findings could be measured by a set of indicators that are in turn closely linked to those findings.

A group's score would be based on combined responses from participating households and the group administrator. A group's score on each element would eventually be specified in regulation as based on a percentage of the total points available, rather than a fixed number. Using a percentage for each element allows for refinement of the set of questions for that element. It also provides a way to compare patterns among households and among groups. Furthermore, using a percentage for each element would allow the board to decide which element it would like to have the most weight. The board may choose to weigh responses on one element more than responses on another, for example.

It is recommended that this evaluation process be in place a minimum of three years before the board considers using the scores in a regulatory context. For example, after three years' of data are collected, the Board might wish to consider establishing in regulation 1) a minimum score for a conditional approval of efforts to observe this pattern, and 2) a minimum score necessary to demonstrate full observation of the C&T pattern.

Also after three years, the board could consider adopting in regulation a process for a person or group to appeal a score assigned by the department to a report submitted under (E) that resulted in denial of an application for a community subsistence hunt permit.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 6 Nay – 5 (one member absent)

Key Points in Discussion

In Support

- ADF&G Division of Subsistence indicated that they plan to transfer current capacity (staff, resources) toward implementing the proposed system, as they already invest substantial time in reviewing reports currently required of CSH participants. This proposal would provide a more quantified way to review reports and, in some ways, would simplify the review and analysis.
- Supporters indicated this is the “single most important change” the committee could recommend to address the impacts of increased CSH participation.
- Noted that it is similar in intent to proposal submitted to the committee by Paxson Advisory Committee (see Proposal I-H), but the majority of the committee prefers the criteria and system in this proposal.
- The proposed system would make the determination of who may be adhering to the pattern in the CSH less subjective.

In Opposition

- Concerned that the process would be burdensome on hunt administrators, group members, and ADF&G.
- Believes that this type of regulatory process is more appropriate and warranted in a Tier II situation. Since the Copper Basin caribou and moose hunts are in a “Tier I-plus” status, do not support this requirement.

PROPOSED BY: Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-280)

PROPOSAL 72 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Follow the same basic guidelines as the old Tier II system (points to each community based on past use of resource) as follows:

The community hunt protocol should follow along the same basic guidelines as the old Tier II system. Points should be given to each community as a whole depending on its past use of the resource. There should be a point total baseline. Above the baseline, the community may participate in the hunt. Below the baseline, the community would not qualify for participation. Points should be awarded to each community based on an average number of points for each individual member of the community. Communities should be composed of a minimum of 20 members (this to allow for hunters in the smaller area communities to participate without needing members from outside of their immediate area).

The criteria/questions suggested below is a starting point and should be open to discussion. The proposal is that communities that average 22 points or better should be eligible to participate in the community subsistence harvest (CSH) hunt.

Criteria / Questions are as follows:

1. How many years have you used the resource (game population) that you are applying for?
 - 1-5 years = 1 point
 - 5-10 years = 2 points
 - 10-15 years = 3 points
 - 15-20 years = 4 points
 - > 20 years = 5 points
2. How many days during each year do you spend hunting/fishing/gathering within the (general) hunt area?
 - 1-10 days = 1 point
 - 10-20 days = 2 points
 - 20-30 days = 3 points
 - 30-40 days = 4 points
 - > 40 days = 5 points
3. How far do you have to travel to reach the hunt area?
 - > 300 miles = 1 point
 - 200-300 miles = 2 points
 - 150-200 miles = 3 points
 - 75-150 miles = 4 points
 - < 75 miles = 5 points
4. In which community do purchase most of your fuel? (Note: May have missed a few communities on these lists and propose using the old Tier II community point list).
 - Paxson, Glennallen, Cantwell, Gakona, Gulkana, Chistochina, Copper Center, Mendeltna, Chickaloon, Lake Louise., Kenny Lake Dot Lake, Tanacross, Mentasta = 5 points
 - Delta Junction, Palmer, Valdez, Denali Park, Healy, Talkeetna, Tok , Chicken = 4 points
 - Fairbanks/North Pole, Anchorage, Palmer, Wasilla, Nenana, Ester, = 3 points
 - Kenai/Soldotna, Homer, Seward, Eagle, Wiseman, Circle City, Central= 2 points

All other communities off of the highway system = 1 point

5. In which community do you purchase most of your food?
Glennallen, Copper Center, Tok, Delta Junction, Cantwell = 5 points
Valdez, Seward, Homer, Talkeetna, Healy, Nenana = 4 points
Kenai/Soldotna, Wasilla/Palmer, Fairbanks/N. Pole, Anchorage = 3 points
Communities off of the highway system = 2 points

What is the issue you would like the board to address and why? On March 26 our [Paxson] Advisory Committee (AC) met and discussed the community hunt. Like most others, our members felt that the community hunt, as structured, does not serve the purpose for which it was created. Our [Paxson AC] committee feels that the present subsistence seasons, both federal and state, do meet the needs of our area communities and that a separate community hunt is unnecessary.

That said, we [Paxson AC] are aware that once a program is implemented, it is very difficult to remove it, as there are many special interest groups who feel that a specific program may benefit them in particular. Our stance as an advisory committee is that competition among user groups for a limited amount of game or fish is detrimental to the basic premise of having a healthy, balanced eco-system that serves all user groups; both consumptive and non-consumptive.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: **Failed**
 Yea – 1 **Nay – 10** **(one member absent)**

Key Points in Discussion

In Support

- No specific points were articulated by the committee in support of this proposal.

In Opposition

- Some committee members preferred the criteria and system in proposal [71].

- Other committee members do not support either proposal [71 or 72], stating that this type of evaluation should not be required in a Tier I-plus situation

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-281)

PROPOSAL 73 - 5 AAC 92.071. Tier I subsistence permits. Require hunters to be engaged in a pattern of subsistence uses of Nelchina caribou for the Tier I hunt as follows:

The Board of Game needs to take the next step in defining the pattern of subsistence use for the Tier I household caribou hunt in Unit 13. It needs to institute an administrative process similar to that being considered for the Tier I community hunt. Like the yearly application for the community hunt, the household Tier I application should specify the pattern of subsistence use a household is expected to conform to in order to participate in the Tier I hunt. A signature should be required to verify the intent of those in the household to engage in this pattern. Additionally, the Tier I permits already include a reporting requirement for harvest. A short set of questions should be added verifying that the household engaged in the pattern of use defined in the application with a signature attesting to the truth of the answers given.

The Tier I household permit hunt conditions, or required pattern of customary and traditional (C&T) subsistence use, should be developed by the Division of Subsistence and approved by the Board. The post-season permit report, in addition to harvest information, could include some of the same elements that the Division has developed to verify participation in the pattern of use for the community hunt, although the number of questions and their depth would likely be less given the differences between the household and community patterns of subsistence uses.

Important elements that should be included as hunt conditions and reporting requirements include use of a wide diversity of resources from the area; a pattern of use that spans several seasons; close ties and familiarity with the area including the existence or development of a long-term pattern of use; some degree of sharing outside the household; and the incorporation of handing down knowledge through the generations.

A scoring system should be developed that results in the disqualification of an applicant after some for failing to comply with the hunt conditions or for failing to report. For example, if an applicant household hunted and failed to meet the minimum score for the year, or failed to report, the persons in that household would be foreclosed from applying for the next year. If an applicant household failed to meet the minimum score for after applying and receiving a permit twice, thus demonstrating a pattern of non-compliance, the household members would be foreclosed from applying for a Tier I permit for three years. A household that applies for a permit and fails to hunt for two consecutive years would be foreclosed from applying for a permit the next year barring some medical or other justification. Those disqualified from applying for the household Tier I permit would also be barred from applying for the community hunt. Applicants made a conscious choice of the pattern of use to apply for, the household or community Tier I hunt. Those that failed to comply with the condition for the pattern of use selected should not be permitted to game the system by jumping between Tier I hunts.

What is the issue you would like the board to address and why? The board currently requires that those issued Tier I caribou permits in Unit 13 are restricted to hunting moose in Unit 13. The reason the board adopted this hunt condition was twofold: 1) to reflect the C&T pattern of subsistence uses that includes the taking a wide diversity of resources for the area used for subsistence hunting; and 2) to limit the number of persons applying for the Tier I hunt to those genuinely willing to engage in this pattern of use. This hunt condition has not achieved its purpose.

The number of Tier I caribou hunters remains very high, far above the 600-1000 ANS set by the board for the Nelchina caribou herd. Data from the past several years since the board adopted the ANS and the above described hunt condition demonstrates that there continues to be a high number of Tier I applications and a large participation and harvest in the Tier I hunt. This data seriously undermines the basis, and thus legality for the ANS determination. Given the data over the last several years, a strong case exists for arguing that the ANS remains the total available Nelchina harvest, or close to it, thus putting the hunt back into the Tier II regime.

At the same time that the hunt condition restricting moose hunting in Unit 13 has failed to significantly reduce the number of Tier II participants, it has caused hardships to those who genuinely depend on the Unit 13 moose and caribou populations for subsistence uses. It is flooding the area with moose and caribou hunters. Many of those with many years of moose and caribou hunting in this area are not meeting their subsistence needs because of the large number of hunters all concentrated in the same time and area. The caribou hunt has closed early over the last several years. Many of those who are undoubtedly engaged in a subsistence pattern of use are not being afforded a reasonable opportunity or meeting their subsistence needs for moose or caribou.

Defining subsistence uses and instituting an application and scoring system as proposed would benefit all Alaskans who wish to hunt the Nelchina caribou herd. Over a relatively short period of time those who participate in the subsistence hunt will be genuinely engaged in subsistence uses. This will reduce the number of applicants and participants because many who now apply for the Tier I hunt are not engaged in a pattern of use that is subsistence. The 600-1000 ANS would likely be supported by the data generated by the proposed permit reporting and scoring system. This means that many more general hunt permits could be issued that do not have such conditions. If more general hunt opportunity were available, many hunters would choose to participate in a general hunt.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is

available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Failed
Yea – 5 Nay – 4 Abstain – 1 (one member absent)

Key Points in Discussion

The Committee tabled this proposal until the end of the meeting, as it relates to the individual Tier I caribou hunt, rather than the CSH. As a result, there was limited time for discussion. The following points were made in brief discussion:

- Should not impose an eligibility test / criteria on individual hunters when the caribou hunt is above a Tier I level.
- There may be merit to rescinding the requirement that participants in the Tier I caribou hunt must only hunt moose in Unit 13. However, the committee felt there was not sufficient time for them to consider the ramifications of this change, or of other effects of the proposal.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-282)

PROPOSAL 74 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Require direct approval by the Board of Game of groups applying to join the Copper Basin community subsistence hunt as follows:

A group application should be developed by the Division of Subsistence for any group that seeks to join the Copper Basin community subsistence hunt. The Division should review the applications with comments as to completeness and content. The board could review and approve or reject these applications yearly at its work session with each group coordinator given a limited opportunity for public comment.

What is the issue you would like the board to address and why? Abuse of the intent and hunt conditions for the community subsistence hunt by groups of people who are not genuinely engaged in the pattern of community subsistence use identified by the board for the Copper Basin community subsistence hunt.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation

and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 7 Nay – 4 (one member absent)

Key Points in Discussion

In Support:

- Would ensure that all groups demonstrate to the board that they meet the CSH requirements.
- It is appropriate for board to assume this role, as it ultimately is an allocation decision (affects who qualifies for participation in the CSH).
- One committee member stated support for this idea, but was also satisfied with the solution of providing a definition of “community” (see Proposal [70]).

In Opposition:

- Concern that this would place an undue burden on the board and whether they would have time to review all applicants.
- Concern this places board in an “administrative” rather than policy and allocation role. Board should delegate this type of responsibility to the Division of Subsistence (such as in Proposal [71]) and then require an annual report on any problems, etc.
- Concern that the board would not have the time to critically review applications and it would be a “rubber stamp” exercise, taking time without much merit.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-283)

PROPOSAL 75 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Implement reporting and antler destruction requirements for community subsistence harvested moose in the Unit 13 area hunt as follows:

Require that community subsistence harvest (CSH) hunters bring the harvested moose to the Cantwell or Glenallen ADF&G offices as soon as they come out of the field; require antler destruction for any community subsistence hunt harvested moose.

What is the issue you would like the board to address and why? This proposal may address the impacts of increased CSH participation by reducing the interest in participation in the CSH and the impacts of the increase in participation in this hunt, and would tie the harvest more directly to subsistence use by requiring antler destruction.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 6 Nay – 5 (one member absent)

Key Points in Discussion

In Support:

- May help reduce impacts from high participation in the CSH hunt, by reducing interest in participating in this hunt.

In Opposition:

- The Glennallen and Cantwell ADF&G offices would not be convenient locations for all CSH participants to report.
- Concern about burden on ADF&G staff to receive all hunters and confirm salvage/antler destruction, and to store meat for sharing or arrange for its distribution.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-284)

PROPOSAL 76 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Require antlers taken through the community subsistence harvest (CSH) hunt be turned in to ADF&G as follows.

Require that antlers taken through the CSH hunt be turned in to ADF&G, to allow them to get additional information about the harvest and to sell the antlers at auction with revenues used to help cover the added costs of CSH hunt management as follows:

What is the issue you would like the board to address and why? This proposal may address the impacts of increased community subsistence harvest (CSH) participation by reducing the interest in participation in the CSH and the impacts of the increase in participation in this hunt. It would also provide revenue to ADF&G to help cover the cost of administering the hunt.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: NO ACTION was taken on this proposal
(Vote for No Action = Yea – 11, Nay – 0, one member absent)

Key Points in Discussion

- It would not be legal to dedicate the funds received by ADF&G through auction to administration of the CSH. Given this, the committee favored no action on this proposal.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-285)

PROPOSAL 77 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a quota for each subarea in Unit 13 for the "any bull" moose hunt as follows:

Establish a firm "any bull" quota per subarea in Unit 13

(NOTE: This would not require a regulatory change by the board since ADF&G has discretionary authority to implement this change under existing regulations for Unit 13, but ADF&F recommends that it be presented to the board for their information and to invite direction.)

What is the issue you would like the board to address and why? In Unit 13, the high harvest of "any bulls" in high use subareas (e.g. Unit 13A) during the first day or few days of the community subsistence harvest opening on August 10 has caused ADF&G to close the "any bull" hunt in all of Unit 13 by emergency order very early in the season, significantly reducing the opportunity for hunters to take "any bull" in other subareas. Establishing a quota for each subarea (either by the board or ADF&G) would reduce the potential for overharvest in heavily used areas, keep the harvest within the allocation specified in regulation (5AAC 85.045(11)(B)), and maintain the opportunity to harvest "any bull" in all subareas. This would spread opportunity and reduce social conflicts.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 8 Nay – 2 (two members absent)

Key Points in Discussion

In Support

- Recommend ADF&G look at past harvest patterns and allocate the subarea quotas proportionally.
- Establishing an “any bull” quota per subarea would spread opportunity throughout the area, avoiding having the quota taken rapidly and predominantly in accessible subunits, such as Unit 13A.
- Recognize that harvest may exceed the 100 “any bulls” in some years and the department would then reduce the total below 100 in subsequent years to achieve a longer-term balance. (ADF&G noted that this should be addressed in the board’s findings on this topic.)

In Opposition

- This type of micromanagement would make it more difficult for ADF&G to manage the “any bull” harvest in Unit 13.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-266)

PROPOSAL 78 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Require more rapid harvest reporting of moose taken under the “any bull” hunt in Unit 13 as follows:

Provide more rapid harvest reporting and more responsive in-season management during the “any bull” harvest in Unit 13.

(NOTE: This would not require a regulatory change by the board since ADF&G has discretionary authority to implement this under 5 AAC 92.052 (discretionary permit conditions

and procedures), but ADF&G recommends that it be presented to the board for their information and to invite direction.)

What is the issue you would like the board to address and why? In Unit 13, the high harvest of “any bulls” in high use subareas (e.g. Unit 13A) during the first day or few days of the community subsistence harvest opening on August 10 has caused ADF&G to close the “any bull” hunt for all of Unit 13 by emergency order very early in the season, significantly reducing the opportunity for hunters to take “any bull” in other subareas. Requiring harvest reporting sooner (e.g., within 12 or 24 hours of killing a moose) by phone or internet would give the department more current information about the “any bull” harvest so it can be managed to meet biological objectives while providing opportunity throughout Unit 13 to the extent possible.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: **Passed**
 Yea – 10 **Nay – 0** **(two members absent)**

Key Points in Discussion

In Support

- Beneficial to have information as soon as possible about “any bull” harvest to assist ADF&G in meeting biological objectives while providing harvest opportunity throughout Unit 13.
- Ask ADF&G to consider and implement feasible requirements for more rapid harvest reporting and in-season management notifications.

Considerations

- Recognize that there are limitations on cell phone coverage in some areas of Unit 13.
- Recognize that hunters whose practice is to remain in the field for longer periods may have difficulty responding within a 12- or 24-hour post-harvest report timeframe.
- Will likely require some additional department staff time on heavy use weekends, although this has been required in the past as well.

The committee discussed potential use of checkpoints in the field, but ADF&G did not recommend this, indicating that staffing costs would be too high.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-267)

PROPOSAL 79 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Direct ADF&G to open and close the “any bull” moose season on certain days in Unit 13 as follows.

Recommend ADF&G use its existing management discretion, in all subunits throughout the community subsistence harvest (CSH) area, to open and close the CSH on certain days (including weekend days) if necessary for conservation and/or to not exceed the “any bull” quota as follows:

Note that this would not require a regulatory change by the board since ADF&G has discretionary authority to implement this under 5 AAC 92.052 (discretionary permit conditions and procedures), but ADF&G recommends that it be presented to the board for their information and to invite direction.

What is the issue you would like the board to address and why? In Unit 13, the high harvest of “any bulls” in high use subareas (e.g. Unit 13A) during the first day or few days of the CSH opening on August 10 has caused ADF&G to close the “any bull” hunt for all of Unit 13 by emergency order very early in the season, significantly reducing the opportunity for hunters to take “any bull” in other subareas. Because the “any bull” harvest quotas are relatively small compared to the number of CSH hunters, harvest quotas can be reached quickly in heavily hunted areas. Communication and reporting delays can result in harvests that greatly exceeded the quota before an Emergency Order can be issued. Judicious use of in-season closures would give ADF&G the chance to catch up with harvest monitoring and reassess progress toward the “any bull” and overall harvest quotas in-season, ensuring appropriate management to the targets while maximizing participation throughout the units.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

playing field to harvest an animal. This proposal includes a provision to allow the transport of harvested game, personnel and gear in the middle of this prescribed season by motor vehicles.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Failed
Yea – 1 Nay – 7 Abstain – 3 (one member absent)

(NOTE: During consideration by the board’s committee, this proposal was amended from an earlier version to eliminate the words “except an aircraft or a boat”.)

Key Points in Discussion

The committee member who submitted this proposal noted that he brought forward this proposal to start conversation about reducing hunting pressure during the early moose season and that he did not have an opinion on it.

In Support

- Recommend that the board consider limitations on motorized vehicle use during the CSH early season to help reduce hunting pressure on the early season “any bull” hunt and to reduce impacts to the land (e.g., proliferation of motorized trails).

In Opposition

- The use of motorized vehicles to access and transport game is customary and meets the intent of the board’s findings for the CSH. This would be an unnecessary restriction on customary use.
- Concern that this would be very difficult to enforce

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-272)

PROPOSAL 81 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Restrict community subsistence harvest hunters in Units 13, 11, and portions of Unit 12 from hunting within 24 hours of using off-road vehicles as follows:

From August 18 to August 31, participants in the community subsistence harvest hunt for moose and caribou may not hunt for one day following the use of an off-road motorized vehicle. For the purpose of this regulation, a motorized use day ends at midnight of the day than an off-road motorized vehicle was used. If animal is harvested after the prohibition on a motorized use has passed, an off-road motorized vehicle can be used to transport the meat of a harvested animal. (Note, this is similar to the restriction in the Cordova bull moose hunt.)

What is the issue you would like the board to address and why? The intent is to reduce hunting pressure on the early season hunt and level the playing. It allows hunters to access the backcountry, yet provide for fair chase and reduce the rate of harvest, which will lengthen the season. This is similar to the way hunting using an aircraft for access is regulated

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: **Failed**
 Yea – 0 **Nay – 9** **Abstain – 2 (one member absent)**

Key Points in Discussion

The committee member who submitted this proposal noted that he brought forward this proposal to start conversation about reducing hunting pressure during the early moose season and that he did not have an opinion on the proposal.

In Opposition

- The use of motorized vehicles to access and transport game is customary and meets the intent of the board’s findings for the CSH. This would be an unnecessary restriction on customary use.
- Concern that this would difficult to enforce.
- Noted that the Cordova bull moose hunt (referenced in the description of the proposal) occurs in a much smaller geographic area and is accessed by airboats. While the restriction on

motorized use may be a useful tool in the Cordova hunt, its utility is not transferable to the Copper Basin CSH hunt.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-273)

PROPOSAL 82 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Manage the Unit 13 community subsistence harvest caribou hunt through the set season as long as the overall harvest quota is not exceeded.

Manage the Unit 13 community subsistence harvest (CSH) program for caribou to continue the community hunt through the season established in regulation (August 10 – September 20, and October 21 – March 31), as long as the CSH allocation of 300 caribou and the overall harvest quota are not exceeded.

(NOTE: This would not require a regulatory change by the board since ADF&G has discretionary authority to implement this change under existing regulations for Unit 13, but ADF&G recommends that it be presented to the board for their information and to invite direction.)

WHAT IS THE ISSUE YOU WOULD LIKE THE BOARD TO ADDRESS AND WHY?

In Unit 13, regulations provide that “up to 300 caribou may be taken” in the CSH hunt (August 10 – September 20, and October 21 – March 31). However, in the past, ADF&G has closed the CSH caribou hunt in Unit 13, or not reopened the hunt for the fall/winter season, when the *overall* reported state harvest combined with the anticipated federal harvest for the Nelchina herd has approached the *overall* harvest quota, even though 300 caribou were not harvested in the CSH hunt. Managing the 300 caribou CSH allocation as a quota that should be met in Unit 13 (provided there is no conservation concern) would increase opportunity for caribou harvest through the CSH program, including likely extending the hunt into the fall/winter season.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: Passed
Yea – 10 Nay – 0 (two members absent)

(During consideration by the board’s committee, this proposal was amended to add, “and the overall harvest quota are” not exceeded, to avoid any conservation concern.)

Key Points in Discussion

In Support

- Committee members unanimously supported this change in management of the CSH caribou hunt.
- Added language to ensure that the hunt would be managed to ensure the overall harvest quota is not exceeded, to avoid any potential conservation concern.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations EG-C14-355

PROPOSAL 83 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. Discontinue the community subsistence harvest (CSH) program when the harvestable surplus exceeds the minimum Amount Necessary for Subsistence (ANS), and replace it with a weighted drawing permit for Alaska residents only.

Unit 13

1 moose per regulatory year, only as follows:

RESIDENTS HUNTERS:

1 moose by weighted drawing permit only; Sept. 1 - Sept. 20 (General hunt only)
up to 100 permits for bulls and up to 25 permits
for antlerless moose may be issued; or

One bull with spike-fork antlers or 50 inch antlers Sept 1 - Sept. 20 (Subsistence hunt only)
or antlers with 4 or more brow tines on one side; or

One bull by registration permit only. Dec. 1 - Dec. 31 (Subsistence hunt only)

NONRESIDENTS HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more Sept. 1 – Sept. 20 (General hunt only)
brow tines on one side by drawing permit only;
up to 250 permits maybe issue.

What is the issue you would like the board to address and why? When the harvestable surplus is greater than the maximum ANS, the board has the least legal obligation to provide a

priority for subsistence uses. With harvestable surplus above the ANS (maximum), AS 16.05.258(b)(1)(A), ADF&G may issue subsistence registration permits and apply discretionary conditions to the hunt consistent with the customary and traditional (C&T) use pattern, and issue general drawing permits to harvest game.

AS 16.05.255(d) allows a preference for resident moose hunters without the hunt being determined to be for subsistence use only. In the past the Alaska courts have determined that drawing hunts did not provide a reasonable opportunity for subsistence use, so just call it a weighted drawing hunt for residents only.

A weighted drawing permit system means that those drawn in previous years for the same drawing permit hunt are not drawn again until all other applicants who keep applying for the specific drawing hunt have been drawn. New drawing applicants rise up in preference by accumulating years of consistent applying.

When determining if a reasonable opportunity for subsistence uses is being met under harvestable surplus conditions found consistent with AS16.05.258(b)(1) the board may integrate opportunities offered under both state and federal regulation, 5 AAC 99.025(b), to meet subsistence uses. Federal registration permit (FM1301) - 1 antlered bull moose may be harvested on 4.1 million acres of federal lands in Unit 13, August 1 – September 20.

The board is not legally obligated to create a community-based subsistence harvest program in the Copper River basin for moose as long as the harvestable surplus is above the maximum ANS, it's just that the board chose to do so.

I would recommend that the board's committee on the Copper Basin Area Subsistence Hunting Regulations oppose continuing the CSH program for moose and adopt these regulations, as long as the harvestable surplus is above the maximum ANS for moose in Unit13.

Additional Information: This proposal was considered by the Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (committee) which held three meetings prior to the proposal deadline. The 12 member committee was established by the Board of Game and included board members, advisory committee members, and members of the public. At their last meeting, the committee reviewed 19 proposals that were drafted at the request of the committee or were submitted by committee members. All of the proposals considered by the committee have been submitted to the Board of Game for consideration at the Central/Southwest Region Board of Game meeting scheduled for February 2015. The committee recommendation and discussion on this proposal is summarized below. Committee action on all 19 proposals is available in the meeting summary that can be accessed on the committee meeting website located at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo.

Results of April 18, 2014 Committee Meeting

Committee vote: **Failed**
 Yea – 4 **Nay – 7** **(one member absent)**

Key Points in Discussion

In Support:

- This proposal provides a more equitable opportunity for all Alaskans to have the opportunity to participate in the moose hunt in this area.
- A weighted drawing hunt can also provide a reasonable opportunity for subsistence users.
- Need to consider that subsistence needs are also addressed by subsistence hunt opportunities provided on federal lands.

In Opposition:

- Support the intent of the community subsistence hunt and do not want it eliminated.
- This proposal would not provide the “any bull” hunt that is important to meet subsistence needs of communities.
- Drawing hunts do not provide certainty of participation or stability in hunting over the long-term, which are important elements of the communities’ subsistence hunt.
- The committee has helped identify a number of options to improve the CSH for the board’s consideration. Recommend that the board apply some of these tools to fine-tune the CSH and let those work for several years, rather than eliminating the CSH and replacing it with a weighted drawing hunt.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations (EG-C14-286)

PROPOSAL 84 - 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose. Change the “any bull” hunt in Unit 13 to a drawing hunt as follows:

The new regulation would read:

RESIDENT HUNTERS: 1 bull or antlerless moose by weighted drawing permit.

Define "weighted" as: Once you are drawn you go to the bottom of the applicant list for the drawing hunt and cycle back to the top over years of continued applying.

What is the issue you would like the board to address and why? Unequal opportunity for Alaskans to reap the rewards of active predator/prey management on state public domain. The statutory authority creating the community subsistence harvest, AS 16.05.330(c) in Unit 13 does not trump the state subsistence law, AS 16.05.258, when hunt regulations can distinguish among subsistence users, AS 16.05.258(b)(4)(B).

The "any bull" component of the moose population in Unit 13 is the most sought after. When the harvestable surplus of moose in Unit 13 is greater than the Amount Necessary for Subsistence (ANS) the harvest is allocated in accordance with its statutory authority, AS 16.05.258(b)(3). The board may differentiate between patterns of subsistence users only when the harvestable

surplus of moose in Unit 13 falls below the ANS, AS 16.05.258(b)(4). That is not the case now for moose in Unit 13.

PROPOSED BY: Alaska Outdoor Council (EG-C14-258)

PROPOSAL 85 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Modify the community subsistence harvest permit system as follows:

Eliminate the community subsistence harvest permit (CHP) as a separate permit from individual hunting permits.

After individual Tier I or Tier II permits are awarded to an individual, then the individual hunter permits have the option of pooling individual permits into CHP, with the same regulatory conditions of the individual permits for season lengths, bag limits, horn restrictions, application sign up dates, reporting success requirements and proxy hunters. Customs and traditions imposed after pooling individual permits must be approved by ADF&G. The designated harvest quota of 300 Nelchina caribou for CHP is eliminated and the total annual harvest quota applies equally to all individuals and CHP.

What is the issue you would like the board to address and why? Eliminate the CHP as a separate permit from individual hunting permits. Go back to awarding individual hunter permits with the option of pooling individual permits into CHP. Do not give any priority preference to CHP that individual hunters do not also enjoy, including time to file applications, length of seasons, relaxed horn restrictions, time to report success, local hunter preference or location of residency, and eliminate eligibility requirements to exercise Ahtna racial customs and traditions for all CHPs. Granting a racial preference based on customs and traditions, and location of residency, violates the Public Trust Doctrine to provide state game resources equally to all the residents of Alaska (see *McDowell v. State*, 785 P.2d 1 (Alaska 1989) [rural preference unconstitutional] and *Owsichek v. State*, 763 P.2d 488 (Alaska 1988) [Public Trust Doctrine upheld]).

Whether a Tier I level (sport/general) hunt, or a Tier II level subsistence hunt, pooling of individual permits into CHPs will allow all residents to continue their customs and traditions, without denying permits to those that have different customs and traditions, and without granting an unconstitutional racial rural preference for “community” (CHP) eligibility criteria to get a hunting permit (see *McDowell*; *Manning-I*). Only the individual eligibility criteria (not community) should control awarding an individual permit and subsequent pooling of individual permits into CHPs.

This will prevent ADF&G’s and the board’s blatant unconstitutional actions of designating and requiring particular racial customs and traditions in order to get a CHP hunting permit (a violation of Alaska Constitution Article 1 Section 1 equal rights, Article VIII Section 3 “common use” equal subsistence rights for all Alaskans, per *McDowell v. State*, 785 P.2d 1 (Alaska 1989) and *State ADFG v. Manning*, 161 P.3d 1215 (2007) (“*Manning-I*”) [denial of

equal protections]. This will also avoid continued equal rights litigation against ADF&G and the board for violations of statutory and constitutional equal protection mandates.

PROPOSED BY: Kenneth Manning (EG-C14-231)

PROPOSAL 86 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Divide the annual harvest quota for Nelchina caribou as follows:

Unit 13: Nelchina caribou herd annual hunt (whether Tier I or Tier II level hunt), divide the annual harvest quota for all hunts (Tier I, household, drawing, community harvest/subsistence permits or Tier II), into thirds with one-third limited to August 10-September 20, one third annual harvest quota to October 20-December 31, and one-third for January 1-March 31.

When the one-third quota is achieved, the Nelchina hunt will be closed until the start of the next one-third quota season.

What is the issue you would like the board to address and why? For the Nelchina caribou herd annual hunt, divide the annual harvest quota for all hunts (Tier I household, drawing, community harvest/subsistence permits, or Tier II) into thirds with one-third limited to August 10-September 20, one third annual harvest quota to October 20-December 31, and one-third to January 1-March 31. When the one-third quota is achieved, the Nelchina hunt will be closed until the start of the next one-third quota season.

This will allow a full length hunting season, allow customs and traditions for winter hunts acquiring winter meat harvest, and will spread out the hunters over the season to avoid a mad rush on opening day and an early season harvest quota closure. It will also improve public safety concerns of too many hunters forced in the field for the first few days of hunting, and all in the early season before closed by emergency order that eliminates winter hunting. One-third harvest quotas, divided over the full hunting season, will assure, improve, and protect sustained yield management of the Nelchina caribou herd, and prevent over harvest, while providing for customs and traditions for both summer and winter hunts.

PROPOSED BY: Kenneth Manning (EG-C14-230)

PROPOSAL 87 - 5 AAC 92.050(I). Required permit hunt conditions and procedures Remove the exclusive hunting restriction for caribou in Unit 13 as follows:

Eliminate the requirement that Unit 13 Nelchina caribou hunters cannot hunt moose elsewhere in the state, only in Unit 13.

What is the issue you would like the board to address and why? Eliminate the requirement for all applicants who apply for a Unit 13 Nelchina caribou permit, to hunt moose only in Unit 13.

This will allow the 10,000 to 15,000 Nelchina caribou hunters to hunt moose anywhere in the state, and not force 10,000 to 15,000 hunters upon the Unit 13 moose hunts. This will avoid an overabundance of moose hunters and harvest in Unit 13, will provide more harvestable moose for local Unit 13 hunters, will improve and protect sustained yield management, and will comply with statutory and constitutional equal protections of the law.

Denying Nelchina caribou hunters the right to hunt moose anywhere else in the state except Unit 13 is arbitrary and capricious, unreasonable, and violates the equal protection guarantees of Article VIII Section 3 "common use" rights.

There is no legal nexus between hunting Unit 13 Nelchina caribou and denying moose hunting elsewhere in the state, and there is no management objective other than discouraging residents from applying for a Nelchina caribou permit and exercising their constitutionally protected "common use" rights. This denies Nelchina caribou hunters equal protections of the law. See *State v. Manning*, 161 P.3d 1215 (Alaska Supreme Court 2007) [*Manning-I*, violations of equal protections], and *Manning v. State ADFG, et al*, Alaska Supreme Court, case no. S-15121 (*Manning-IV, pending*)

PROPOSED BY: Kenneth Manning (EG-C14-232)

PROPOSAL 88 - 5 AAC 99.010. Boards of fisheries and game subsistence procedures.

Change the method of determining the Amount Necessary for Subsistence in Unit 13 as follows:

Calculate the number of subsistence users for determining Amount Necessary for Subsistence (ANS) with data based on individual verifiable data from each resident hunter applicant including: (1) years hunted, received, and eaten fish and wildlife for human food for each big game species; (2) the total amount of subsistence resources acquired over each year for up to the last sixty years, including big game, small game, waterfowl, freshwater fish, saltwater fish, and trapping resources harvested; and (3) the number of family members and friends that shared your annual subsistence harvest over the last year three years.

What is the issue you would like the board to address and why? Change the method of determining "Amount Necessary for Subsistence" (ANS) for all hunts, to use only individual past dependency on subsistence resources; eliminate consideration of criteria of location of residency, racial customs and traditions, community socioeconomics, and individual income. Repeal the Board of Game "ANS experiment" that pre-classifies residents without individual criteria data by eliminating thousands as "not real subsistence users," without any questions or data from the individual concerning subsistence use. (See Judge Bauman's decision in *Manning v. State ADFG, Ahtna*, 3KN-09-178CI July 2010).

Who will benefit? The individual subsistence user with the most reliance on subsistence will benefit, no matter what their race or location of residency. All individual Alaskans who rely on subsistence will have equal protection and priority qualification over those that do not depend on subsistence resources as a mainstay of livelihood from their subsistence harvest abilities, all without consideration of and regardless of their location of residency in the state, their racial

customs & traditions, their proximity of domicile to the subsistence resource, their community socio-economics (costs of gas & groceries, income levels), their community level of a primary cash-economy, or the individual's monetary income. Protections afforded by Alaska subsistence law AS 16.05.258(b)(4) for those who rely on long-time subsistence dependency for human food sustenance as well as customs and traditions, will be upheld and allowed to continue for future generations of all Alaskans.

This will help unify all the people of the State of Alaska, will stop the growing racial-rural-urban divide of subsistence use, will uphold the Alaska Constitution Article VIII Section 3 "common use" equal rights for all defined as subsistence as highest priority, then sport, then commercial use of fish & wildlife resources. Also will comply with judicial (*McDowell*), statutory (Alaska subsistence law AS 16.05.258), the Public Trust Doctrine, and constitutional mandates (Article VIII Section 3 "common use" equal rights).

Unifying all the Alaska people by equal subsistence rights under the Alaska Constitution Article VIII Section 3 "common use," upholding the statutes Alaska subsistence law AS 16.05.258(b), and in conjunction with judicial case precedents, will strengthen Alaska's sovereign statehood rights to manage its fish & wildlife resources for the benefit of all the people of the state of Alaska, and will strengthen and protect our statehood sovereign rights against continued federal demands to take over management of state resources for a select racial rural few. This will also counter recent claims from racial groups that allege the ADF&G and the Board of Game have **failed to protect subsistence** and who now demand they as a private party have "exclusive management authority" over the entire migration route of the Nelchina caribou, and over all state, private, public, and federal fish, wildlife, and water resources that encompass their traditional hunting territory (see proposed "Alaska Natives [Ahtna] Co-Management Demonstration Act of 2014," proposed by Ahtna and introduced by Congressman Don Young to U.S. Congress, March 2014.).

Who will be disappointed? Racial groups that oppose equal subsistence use for all Alaskans, and those who seek an unconstitutional racial rural preference and priorities based on dubious claims of necessary racial priority preference as essential to protect their racial customs & traditions, and those that continue to seek federal management to replace sovereign statehood management of state fish & wildlife resources (See, e.g., *Katie John II*).

The ADF&G and U.S. Fish and Wildlife Service and Bureau of Land Management already require hunter reports for harvest success, thus the existing data can be easily used to verify past subsistence user harvests.

PROPOSED BY: Kenneth Manning (EG-C14-228)

PROPOSAL 89 - 5 AAC 99.070. Tier II subsistence hunting permit points system Change the eligibility criteria for all Tier II subsistence hunts in Unit 13 as follows:

Where Tier II level subsistence hunting permits are required, for all big game species, Tier II eligibility be based on individual verifiable data from each resident hunter applicant for each big

game species applied for including: (1) years hunted, received, and eaten the big game species for human food; (2) the total amount of subsistence resources acquired over each year for up to the last sixty years, including big game, small game, waterfowl, freshwater fish, saltwater fish, and trapping resources harvested; and (3) the number of family members and friends that shared your annual subsistence harvest over the last year three years.

What is the issue you would like the board to address and why? Change the eligibility criteria for all Tier II level subsistence hunts, to use only individual past dependency on subsistence resources, eliminate consideration of eligibility criteria on location of residency, racial customs and traditions, community socio-economics, and individual income.

Repeal the Board of Game "ANS experiment" that pre-classifies residents without individual subsistence harvest criteria data, that eliminates thousands as "not real subsistence users" just to reduce ANS and get out of Tier-II level subsistence hunt. Pre-classification of who is or is not a "real subsistence user" based on racial customs and traditions, without any questions or data from the individual concerning subsistence use, violates statutory and constitutional equal protections. (See Judge Bauman's decision in *Manning v. State ADFG, Ahtna*, 3KN-09-178CI July 2010).

Eliminate the present unconstitutional "rural preference" eligibility criteria of community costs of fuel, community cost of groceries, and number of days spent hunting and fishing in the area of the hunt applied for, and use the total amount of hunting and fishing from anywhere in the state. This will eliminate the unconstitutional "rural preference" priority.

Who will benefit? All individual subsistence users with the most reliance on subsistence will benefit, no matter what their racial customs and traditions, location of residency, community socio-economics, or individual income. All individual Alaskans who rely on subsistence will have equal protection and priority qualification over those that do not depend on subsistence resources as a mainstay of livelihood from their subsistence harvest abilities, and all without consideration of and regardless of their location of residency in the state, their racial customs & traditions, their proximity of domicile to the subsistence resource, their community socio-economics (costs of gas & groceries, income levels), their community level as a primary cash-economy, or the individual's monetary income. Protections afforded by Alaska subsistence law AS 16.05.258(b)(4) [Tier-II level hunt] for those individuals who rely on long-time subsistence dependency for human food sustenance as well as customs and traditions, will be upheld and allowed to continue for future generations of all Alaskans.

This will help unify all the people of the State of Alaska, will stop the growing racial-rural-urban divide of subsistence use rights, will uphold the Alaska Constitution Article VIII Section 3 "common use" equal rights for all - defined as subsistence as highest priority - then sport - then commercial use of fish & wildlife resources. And will comply with judicial holdings (*McDowell v. State*), statutory requirements (Alaska Subsistence Law AS 16.05.258(b)(4) [Tier-II level hunt]), the Public Trust Doctrine, and constitutional mandates (Article VIII Section 3 "common use" equal rights)..

Unifying all the Alaska people by equal Tier-II level subsistence based on individual subsistence dependency, upholding equal rights under the Alaska Constitution Article VIII Section 3 “common use,” upholding the statutes Alaska subsistence law AS 16.05.258(b), and in conjunction with judicial case precedents, will strengthen Alaska’s sovereign statehood rights to manage its fish & wildlife resources for the benefit of all the people of the state of Alaska, and will strengthen and protect our statehood sovereign rights against continued federal demands to take over management of state subsistence resources for the benefit of a select racial rural few. This will also counter recent claims from racial groups that allege the ADF&G and Board of Game have failed to protect subsistence and who now unlawfully demand they as a private party have “exclusive management authority” over the entire migration route of the Nelchina caribou, and over all state, private, public, and federal lands for fish, wildlife, and water resources that encompass their alleged traditional hunting territory (see proposed “Alaska Natives [Ahtna] Co-Management Demonstration Act of 2014,” proposed by Ahtna and introduced by Congressman Don Young to U.S. Congress, March 2014.).

Who will be disappointed? Racial and rural groups that oppose equal "common use" subsistence rights for all Alaskans; those who seek an unconstitutional racial and/or rural preference priority for subsistence use of limited state subsistence resources, and those that continue to seek federal management to replace sovereign statehood management of state fish & wildlife resources (See, e.g., *Katie John II*).

The ADF&G and U.S. Fish and Wildlife Service and Bureau of Land Management already require hunter reports for harvest success for fish and wildlife, big game and small game, thus the existing data can be easily used to verify individual past subsistence user harvests.

PROPOSED BY: Kenneth Manning (EG-C14-229)

PROPOSAL 90 - 5 AAC 85.040. Hunting seasons and bag limits for goat. Change the Unit 13D goat drawing hunt (DG720) to registration hunt as follows:

Propose to have goat drawing hunt DG720 made into registration hunt.

What is the issue you would like the board to address and why? There has been very low participation and success in goat drawing hunt DG720 within Unit 13D, due to very limited and remote access.

PROPOSED BY: Clint Mayeur (EG-C14-226)

PROPOSAL 91 - 5 AAC 85.040. Hunting seasons and bag limits for goat. Add all of Unit 13D to mountain goat registration hunt RG580 as follows:

Unit 11
September 1-November 30; September 1-November 30 (General hunt only)
1 goat by registration permit only; the taking of nannies with kids is prohibited

(6) Unit 13(D)

[THAT PORTION SOUTH OF THE TIEKEL RIVER AND EAST OF A LINE BEGINNING AT THE CONFLUENCE OF THE TIEKEL AND TSINA RIVERS 1 GOAT BY REGISTRATION]

September 1-November 30; September 1-November 30 (General hunt only)

1 goat by registration permit only; the taking of nannies with kids is prohibited

[OF NANNIES WITH KIDS IS PROHIBITED

REMAINDER OF UNIT 13(D) AUG. 10 - SEPT. 20 (GENERAL HUNT ONLY) 1 GOAT BY DRAWING PERMIT ONLY, UP TO 50 PERMITS WILL BE ISSUED; THE TAKING OF NANNIES WITH KIDS IS PROHIBITED]

What is the issue you would like the board to address and why? Unit 13D has traditionally been managed under draw tag (DG719) although there is a healthy population. This area is very difficult to access and mostly tough fly-in country. The current drawing was necessary when sheep hunting was allowed under a general hunt. Now sheep hunting is on a drawing permit system and the goat drawing is no longer necessary.

At the 2007 spring board meeting proposal 95 was passed to add an area in southeastern Unit 13D to the RG580 goat hunt. The new area added in 2007 has proven to be mildly popular and has produced one-three goats annually.

Goat hunting has been managed successfully on a registration permit system in neighboring parts of Unit 14C for years. Unit 14C is much closer to population centers and has easier access than Unit 13D. With growing goat populations in Unit 8 with a two goat limit, and stable populations in most other areas, goat hunting opportunities are at an all-time high in other areas of Alaska. This means the demand for goats in these tough areas is lower.

Other solutions considered? Status quo; the worst option, the resource will continue to be untapped. Consider a quota with a five-day reporting period, an emergency closure could be made if the quota is met. Consider breaking the area into several registration units.

PROPOSED BY: Aaron Bloomquist (EG-C14-189)

PROPOSAL 92 - 5 AAC 85.040. Hunting seasons and bag limits for goat. Lengthen the goat permit season in Unit 13D to align with the registration hunt as follows:

The season dates for the DG720 goat hunt could be changed to August 10–November 30 or August 10–October 31.

What is the issue you would like the board to address and why? I would like to see the DG720 mountain goat season in Unit 13D to coincide with the Unit 13D mountain goat registration hunt RG580. Portions of the hunt area between DG720 and RG580 are separated by small drainages, and the RG580 hunt remains open until November 30 while the DG720 hunt

closes September 20. With only 35 DG720 permits awarded for all of Unit 13D what would be the harm in having a little longer season? Most of the other drawing goat hunts in the state stay open between mid-October through December. The DG720 hunt area is very large and in the last three years of data since this hunt area was established by combining DG718 and DG719 these are the statistics: In 2011 there were 14 hunters that hunted (25 permits awarded) that harvested eight male goats for 57% success, and in 2012 there were 15 hunters that hunted (35 permits awarded) that harvested two male goats, and one female goat for 20% success, and in 2013 there were 22 hunters that hunted (35 permits awarded) that harvested nine male goats and one female goat for 45% success rate. I have considered keeping the season the same, but what harm would come from a longer season? For the last two years they have awarded ten more permits than in previous years so overall population should be stable if more permits are being awarded. If nothing is done and the season dates remain the same it is just giving hunters less opportunity to hunt.

PROPOSED BY: Randy Anderson (EG-C14-32)

PROPOSAL 93 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Allow brown bears to be taken over bait in all of Units 11 and 13 as follows:

5 AAC 92.044 (a) In addition to any condition that ADF&G may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:

- (1) a person may establish a black bear bait station, or a black and brown bear bait station in Units 7, **11**, 12, 13[(D)], 15, 16, 20(C), 20(E), and 21(D), only if that person obtains a permit under this section;

What is the issue you would like the board to address and why? There are two issues: 1) There has been an administrative interpretation by ADF&G that has eliminated Unit 13 as an area that a guide may apply for as an extra guide use area. This will drastically reduce the take of brown bears in Unit 13. ADF&G staff in Glennallen have closely studied this high harvest rate and deemed it to be sustainable. Allowing the use of bait will replace some of the take eliminated by this interpretation.

2) Unit 11 is quite remote and gets very little pressure from brown bear hunters. Well over 90% of the unit is federal lands that will likely be off limits to baiting under this regulation. This will give a small opportunity, mostly on native lands along the Copper River to take brown bears that are otherwise very difficult to hunt due to dense forest. Most of the area surrounding Unit 11 is already open to brown bear baiting (Units 12 and 13D).

Brown bear take will decline in Unit 13. Nothing will happen in Unit 11, it will be the status quo.

PROPOSED BY: Aaron Bloomquist (EG-C14-188)

PROPOSAL 94 - 5 AAC 85.015. Hunting seasons and bag limits for black bear, and 85.020. Hunting seasons and bag limits for brown bear. Open a fall season for hunting brown and black bear over bait in Unit 13D as follows:

Brown and black bear may be taken over bait in Unit 13D from August 25 to October 15.

What is the issue you would like the board to address and why? We would like to see a fall season for hunting brown and black bear over bait in Unit 13D. There is an overabundance of both brown and black bears in this area, and they have been known to take up to 70% of moose calves in other areas (No study has been done in this area). This area is heavily timbered with difficult access and this would be a good tool to get an increase in the harvest of brown and black bears.

PROPOSED BY: Mat-Valley Fish and Game Advisory Committee (EG-C14-213)

PROPOSAL 95 - 5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for ptarmigan, shorten the season, and add a no-hunt corridor along the roads in Unit 13B as follows:

Unit 13B: five ptarmigan per day, 10 in possession [10 per day, 20 in possession] August 20-March 31; except that from January 1-March 31 there will be a five mile (2.5 miles either side of the road) no-hunting corridor along both the Denali and Richardson Highways.

What is the issue you would like the board to address and why? The ptarmigan season in Unit 13B. The present season does not address nor adequately protect the ptarmigan populations in our subunit, especially along the roadside. Ptarmigan densities off of the Denali and Richardson highways are healthy, while those along the road are not. The August 10 opening date does not protect juvenile birds. The early closure (November 30) does not allow for late season hunting which is more likely to target populations farther from the road system. The present bag limit (ten per day, 20 in possession) is too liberal if we couple it with extended season dates. Our regulation is more complicated than most bird regulations, but we are addressing harvest in one of the most heavily hunted areas of the state. If we are to continue to offer hunting opportunities for as many hunters as possible without negatively impacting our bird populations, then the hunting public must, by necessity, become more educated.

PROPOSED BY: Paxson Fish and Game Advisory Committee (EG-C14-201)
