

# Bethel Area Proposals - Unit 18

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## PROPOSAL 4

### **5 AAC 85.050. Hunting seasons and bag limits for muskoxen.**

Extend the hunting season for muskox in Unit 18, Nelson Island as follows.

| <b>Units and Bag Limits</b>             | <b>Resident<br/>Open Season<br/>(Subsistence and<br/>General Hunts)</b> | <b>Nonresident<br/>Open Season</b>  |
|---|---|-------------------------------------|
| (1)                                     |   |                                     |
| Unit 18, Nelson Island                  |   |                                     |
| 1 muskox by registration<br>Permit only | Feb. 1- <del>Mar. 31</del> [MAR. 25]<br>(General hunt only)             | Feb.1- <del>Mar. 31</del> [MAR. 25] |

**What is the issue you would like the board to address and why?** Extend the season for muskox on Nelson Island in order to increase hunter opportunity and simplify regulations to match proposed changes to Nunivak Island muskox hunts. A longer season would allow area hunters more flexibility to schedule hunts around challenging weather and snow conditions, which are typical of the hunt area. For this registration hunt the Department of Fish and Game (department) limits the number of permits available to ensure that we get the appropriate harvest. In 2018-2019, the department issued 50 permits and harvested approximately 45 muskox.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F19-179)  
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## PROPOSAL 5

### **5 AAC 85.050. Hunting seasons and bag limits for muskoxen.**

Extend the hunting season for muskox in Unit 18, Nunivak Island as follows.

| <b>Units and Bag Limits</b>  | <b>Resident<br/>Open Season<br/>(Subsistence and<br/>General Hunts)</b> | <b>Nonresident<br/>Open Season</b> |
|--|---|------------------------------------|
| (1)  |   |                                    |
| Unit 18, Nunivak Island  |   |                                    |
| 1 bull by drawing permit only;<br>up to 110 permits may be issued; |   |                                    |

or I muskox by registration  
Permit only

**Aug 1.**[SEPT. 1] – Sept. 30

**Aug 1.**[SEPT. 1] – Sept. 30

**Jan. 15**[FEB. 1]-March **31**[15] **Jan. 15**[FEB 1]-March **31** [15]

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

Extend the season for muskox on Nunivak Island. The population on Nunivak is over the management goal and the Department of Fish and Game needs to issue more permits to reduce the population. Almost all hunters on Nunivak Island use either a guide or transporter to hunt muskox. A longer season will increase the opportunity for hunters to use the limited commercial services on the Island. Transporters on Nunivak Island have reported being unable to meet hunter demand for transportation services with recent increases in permit availability and due to high demand during inconsistent weather windows that allow travel to the island.

**PROPOSED BY:** Alaska Department of Fish and Game

(HQ-F19-161)

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**PROPOSAL 6**

**5 AAC 92.034. Permit to take and use game for cultural purposes.**

Add muskox to the list of species that can be taken under a cultural education program permit for Unit 18 as follows:

I am proposing that muskox be added to the list of species under the Cultural Education Program Permit for Nunivak Island for the years where the herd is healthy enough to allow it.

**What is the issue you would like the board to address and why?** We are working on developing a yearly Cultural Education outing where three or four elders will take the high school and upper junior high students on a three to four day trip where survival skills, traditional practices and values and gaining the confidence to go out on our island to practice subsistence will be the central themes. In order to allow our students to learn to hunt, field dress, butcher and properly store a vital large game animal on our island in the ways of the Cup'ig people. This activity is designed to pass on the Cup'ig values of subsistence living, respect for the environment and the animals who share it with us and the importance of community and acting as a contributing member of one's community. The elders who will be teaching the students have all grown up on Nunivak Island and practice subsistence living. They are qualified and willing to pass these values on to the next generation. A small group of students will be taken along to harvest the animal and. They will actively participate in the field dressing of the animal. All of the secondary students will participate in butchering and preparing the meat for storage. The entire school will participate in eating the meat as prepared by the school cook.

I believe that the harvest of a muskox would be a great part of that outing in years where the herd is large enough to allow for it. I sent in an application for this potential muskox harvest. I noted that muskox is not listed as a species under conditions, terms and restrictions and effectively that will prevent us from participating this year.

**PROPOSED BY:** Peter Hawkins, Nuniwarmiut School (EG-F19-002)  
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**PROPOSAL 7**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Change the opening date for the registration moose hunt, RM615 in Unit 18 as follows:

The Lower Kuskokwim Fish & Game Advisory Committee seeks to change the start date of the RM615 moose hunt from September 1 to September 5.

**What is the issue you would like the board to address and why?** Hunters in the Lower Kuskokwim region are active subsistence users and rely on moose to meet their subsistence needs. The RM615 is a popular Unit 18 hunt for many hunters due to its location and close proximity to lower Kuskokwim communities. Changes in weather conditions in recent years have brought warmer and wetter weather in late August and early September. Zone 1 of the RM615 hunt generally closes by emergency order within the first week of September. Hunters have struggled with preserving their catch until they can return home from their hunt due to the increased wet and warm weather. Moving the start date of the hunt from September 1 to September 5 may allow hunters to hunt during cooler and dryer weather conditions.

**PROPOSED BY:** Lower Kuskokwim Fish & Game Advisory Committee (EG-F19-058)  
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**PROPOSAL 8**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Extend resident season for moose hunting in Unit 18 Remainder as follows:

**5 AAC 85.045 Hunting seasons and bag limits for moose:**

Remainder of Unit 18

RESIDENT HUNTERS:

- |  |   |
|--|---|
| 2 moose; of which only<br>1 may be an antlered bull; a<br>person may not take a calf or a<br>cow accompanied by a calf; or | Aug. 1 - Sept. 30                         |
| 2 antlerless moose; or   | Oct. 1 - Nov. 30                          |
| 2 moose  | Dec. 1 – <b><u>April 30</u></b> [MAR. 15] |

**What is the issue you would like the board to address and why?** For the Remainder of Unit 18, moose hunting on state land closes March 15 while federal regulations state that federal lands remains open until April 30. Hunters are therefore required between March 16-April 30 to only hunt on federal lands. Extending hunting on state lands until April 30 will align federal and state regulations and provide additional hunting opportunity for hunters in an area that has struggled with more moose than habitat can support.

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**PROPOSAL 9**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Modify the hunting season and bag limit for moose in Unit 18 as follows:

| <b>Units and Bag Limits</b> | <b>Resident<br/>Open Season<br/>(Subsistence and<br/>General Hunts)</b> | <b>Nonresident<br/>Open Season</b> |
|-----------------------------|---|------------------------------------|
|-----------------------------|---|------------------------------------|

(16)

Unit 18, that portion south of and including the **waters draining into** Goodnews **Bay** [River drainage]

1 moose by registration permit only during the period of [Jan. 1 – Jan. 31 a season of up to 21 days may be announced by emergency order];

**Dec 1 – March 31**  
[Jan. 1 – Jan. 31]

No open season

**What is the issue you would like the board to address and why?** Extend the resident open season for the winter moose hunt in the Goodnews River Drainage in Unit 18 in order to increase hunter opportunity in the area. Inconsistent snow and weather conditions have in the past limited hunting during the scheduled 1-month open season in January. Low participation in the hunt has would allow for more hunting opportunity with little risk of overharvest. Only 11 were issued in 2017 with five moose harvested and three in 2018-2019 with no moose harvested. Poor winter travel conditions in 2018-2019 limited hunter access to hunting areas. The hunt quota in the area could more easily be met if the announced opening could be timed to coincide with sufficient snow cover to allow winter transportation. While there is not a recent population estimate, the results from a fall 2016 composition survey are 46 bulls per 100 cows and 41 calves per 100 cows. We believe with the high calf cow ratios and high adult survival that the population has grown to over 300 moose from the last count of 203 in 2013.

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**PROPOSAL 10**

**5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 18 as follows:

| <b>Units and Bag Limits</b>  | <b>Resident<br/>Open Season<br/>(Subsistence and<br/>General Hunts)</b> | <b>Nonresident<br/>Open Season</b> |
|--|---|------------------------------------|
| (16)<br>...  |   |                                    |
| Unit 18, that portion south of<br>and including the Goodnews<br>River Drainage   |   |                                    |
| 1 antlered bull by registration<br>permit only; or   | Sept. 1—Sept. 30  |                                    |
| 1 moose by registration<br>Permit only; During the Jan. 1–Jan<br>31 a season up to 21 days may be<br>announced by emergency order                | Jan. 1–Jan. 31<br>(Season to be announced)                              |                                    |
| Remainder of Unit 18   |   |                                    |
| RESIDENT HUNTERS:  |   |                                    |
| <b>Up to</b> 2 moose; of which<br>only 1 may be<br>an antlered bull;<br>a person may not<br>take a calf or<br>a cow accompanied<br>by a calf; or | Aug. 1—Sept. 30   |                                    |
| <b>Up to</b> 2 antlerless moose; or  | Oct. 1—Nov. 30.   |                                    |
| <b>Up to</b> 2 moose   | Dec. 1—Mar. 15  |                                    |

NONRESIDENT HUNTERS:

1 antlered bull: or  
1 antlerless moose

Sept. 1—Sept. 30  
Dec. 1— Mar. 15

...

**What is the issue you would like the board to address and why?** To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually. The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014 Board of Game meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area and nonresident antlerless hunt was adopted at the January 2017 Board of Game meeting in Bethel. The board has previously reauthorized the antlerless moose season for resident hunts in Unit 18 remainder for regulatory year (RY) 2016 through RY2019. This proposal requests reauthorization for RY2020.

Implementation of antlerless hunts began in 2007 and has continued each year due to increased moose abundance, productivity, and population growth along the Yukon River drainage in Unit 18. Based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated at a minimum of 14,000 animals. The most recent estimates of calf to adult ratios range from 14:100 in 2018 in the eastern portion of Unit 18 Remainder to 42:100 in 2017 in the western portion of Unit 18 remainder. Twinning rates have also declined from 50% for all areas in previous years to below 20% for the eastern portion of the hunt area. While the overall population still remains high, the recent declines in productivity and evidence of winterkill of calves and adults in the winter of 2018/2019 suggest that segments of this population may benefit from reduced harvest. The suggested possible reduction in the bag limit from 2 moose to “up to 2 moose” is the first step as the department evaluates harvest rates and declines in population and productivity that are likely due to density dependent factors. The “up to” language gives ADF&G the ability to reduce the bag limit portion as more information is gathered and analyzed.

Although the current year harvest data in the Remainder of Unit 18 has not been finalized due to the early proposal deadline, we expect harvest to be similar to the past four years and well within sustained yield for this robust population. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18.

The moose population in the Goodnews River drainage had grown steadily in the past 15 years following a closure in 2004. The hunt reopened in 2008 to a limited registration hunt with a quota of 10 moose. As the population has grown, the quota has gone up and in 2016 was increased to 30. The season has never been closed by Emergency Order, and in recent years the quota was not met. The winter hunt was requested by the communities of Goodnews Bay and Platinum to have additional opportunity to harvest moose when the fall harvest was ten moose lower than the quota.

In the two years that the winter hunt has been held, harvest has been low (only five killed in RY2017 and none in RY2018). The population now is over 300 moose and based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Goodnews River Drainage.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F19-173)  
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**PROPOSAL 11**

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

Establish a minimum caliber rifle to be used to harvest moose in Unit 18 as follows:

Restrict the use of centerfire and rimfire rifles .224 caliber and smaller and require a minimum of .243 or 6 mm caliber centerfire rifles for the harvest of moose in Unit 18.

**What is the issue you would like the board to address and why?** Many moose are killed every year and not harvested as a result of a lack of regulation requiring a minimum caliber rifle to be allowed for harvest of moose in Unit 18. Moose and the number of moose killed need to be accurately communicated, especially in areas that close upon a predetermined quota. Unfortunately, moose are shot with rifles and ammo that are inadequate to kill them.

Moose are one of the largest North American big game species. A common rifle to hunt moose in Unit 18 is the .223 Remington. It is true that centerfire 22 caliber rifles like the .223 and even smaller can effectively kill moose depending on shot placement. Unfortunately, with the high number of variables, perfect shot placement is not a guarantee every time a trigger is pulled, and often can end in a dead and unharvested moose. Because of this, the true number of moose killed is higher than what is reported at harvest, thus negatively impacting the number of moose that can be harvested for subsistence purposes. In addition, this is an ethical problem too. Many times, if a moose is shot with a .223 or smaller rifle, the moose will not fall where it was shot, but rather run off. It is not unusual to harvest moose that have been previously shot with .223 caliber rifles. These moose often cannot be harvested, since large portions are infected and abscessed. Another common situation is moose shot in the jaw by hunters attempting head shots with .223. Moose hit in the jaw by smaller caliber centerfire rifles can appear unharmed leaving the hunter to think they simply missed, when in reality, the moose travels a great distance shot in the jaw, left to starve, unable to chew its food. Finally, one of the most common uses of the .223 and other centerfire 22 caliber rifles and smaller in North America is predator/varmint hunting. As a result, a majority of the ammo loaded commercially for .223 and sold in Unit 18 use hollow point or other fragmenting ballistic tip bullets, none of which are made for the deep bone breaking penetration needed to effectively kill moose. Rather, ballistic tip and hollow point bullets so commonly loaded for the .223 are designed to penetrate and explode inside the body of the coyote, fox or other predator/varmint targeted. Frequently, when these types of bullets are used for big game, especially moose, the targeted animal is maimed by a bullet that comes apart before getting adequate penetration to effectively kill the moose.

**PROPOSED BY:** Bethel Fish & Game Advisory Committee (EG-F19-034)  
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**PROPOSAL 12**

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

Establish a minimum caliber ammunition to be used to harvest moose in Unit 18 as follows:

Establish a minimum caliber ammunition for moose hunts in Unit 18 as .243 or larger.

**What is the issue you would like the board to address and why?** Moose are a primary food source for many subsistence users in Unit 18. Users rely on the meat for food security. Moose are lost each year because of small caliber and low-quality ammunition that are ineffective in killing big game such as moose. While smaller calibers such as 223 Remington, 17 Remington or 22-250 may be adequate for smaller game, they lead to wounding and loss of moose. Many hunters have observed expired, or wounded moose resulting from several shots using inadequate caliber size and ammunition. Others have observed, in successfully harvested moose, infected flesh wounds that are "pus filled" and, as a result, large portions or the entire moose are unfit for human consumption.

Using a caliber of .243 or larger would minimize this waste and encourage ethical moose hunting and salvage practices.

**PROPOSED BY:** Mid-Lower Yukon Fish & Game Advisory Committee (EG-F19-038)

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**PROPOSAL 13**

**5 AAC 92.200. Purchase and sale of game.**

Prohibit the sale of antlers from moose harvested in Unit 18 as follows:

Mid-Lower Yukon communities have observed an increase in moose antler sales in their region (Unit 18). This has increased harassment of moose as people search for large bulls to harvest in order to sell the antlers. There is concern that the taking of large bulls and the harassment could be detrimental to the overall health of the moose, which local communities rely on for subsistence needs. Purchase of antlers and harvest of moose just for antler sales have increased wanton waste and teaches unethical and untraditional hunting practices to youth.

**What is the issue you would like the board to address and why?** The Mid-Lower Yukon AC is comprised of the Yukon River villages of Mountain Village, Pitka's Point, St. Mary's, Pilot Station, Marshall and Russian Mission. The majority of people residing in these communities are subsistence hunters and rely on moose for food security. Mid-Lower Yukon communities have observed an increase in moose antler sales in their region (Unit 18). This has increased harassment of moose as people search for large bulls to harvest in order to sell the antlers. There is concern that the taking of large bulls and the harassment could be detrimental to the overall health of the moose, which local communities rely on for subsistence needs. Purchase of antlers and harvest of moose just for antler sales have increased wanton waste and teaches unethical and untraditional hunting practices to youth.

Current regulations have led to unforeseen social changes in villages along the Yukon River in Unit 18. Hunters have started selecting large bulls instead of the traditional younger animals, there has been an increase in theft of antlers from people's homes, and people have been harassing bulls in early winter including chasing them through trees in an attempt to knock antlers off. People are prioritizing making money off of moose antlers over traditional hunting customs. There has been an increase in unethical and untraditional hunting practices in front of youth.

**PROPOSED BY:** Mid-Lower Yukon Fish & Game Advisory Committee (EG-F19-039)  
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**PROPOSAL 14**

**5 AAC 85.065. Hunting seasons and bag limits for small game.**

Modify the bag limit for ptarmigan in Unit 18 as follows.

**5 AAC 85.065. Hunting seasons and bag limits for small game. (a) ...**

| <b>Units and Bag Limits</b> | <b>Resident<br/>Open Season<br/>(Subsistence and<br/>General Hunts)</b> | <b>Nonresident<br/>Open Season</b> |
|-----------------------------|---|------------------------------------|
| Unit 18                     | Aug. 10-May 15  | Aug. 10-May 15                     |

[50 PER DAY, 100 IN POSSESSION]

**15 per day, 30 in possession**

**What is the issue you would like the board to address and why?** Residents of Unit 18 have reported low rock and willow ptarmigan abundance and poor harvest beginning since 2014. Consecutive wet, cool early summers have likely had a strong negative effect on early chick survival—a phenomenon that has been demonstrated to dramatically affect other Alaskan grouse and ptarmigan populations as well. In addition, consecutive mild and largely snow-free winters have likely increased the effects of predation due to the plumage/landscape color mismatch as well as the inability to effectively thermo-regulate through snow-roosting.

During the 2018 meeting cycle, the Federal Subsistence Board changed the ptarmigan (both rock and willow combined) daily bag limit to 15 ptarmigan per day for Unit 18 (proposal WP18-30) due to local residents concerns about multiple years of low abundance. In addition to the conservation concerns, this proposal also seeks to reduce hunter confusion by aligning the federal and state hunting bag limits for ptarmigan in Unit 18.

Due to the current low abundance, reducing the bag limit would likely have little impact on current hunting opportunity. However, if climatic conditions become more favorable to rock and willow ptarmigan, a lower hunter harvest could protect localized populations for quicker recovery and recolonization.

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**PROPOSAL 15**

**5 AAC 85.065. Hunting seasons and bag limits for small game.**

Address customary and traditional use findings for Alaska hares in Unit 18 and modify the season and bag limit as follows.

**5 AAC 85.065. Hunting seasons and bag limits for small game. (a) ...**

| <b>Units and Bag Limits</b>  | <b>Resident<br/>Open Season<br/>(Subsistence and<br/>General Hunts)</b> | <b>Nonresident<br/>Open Season</b> |
|--|---|------------------------------------|
| (2)  |   |                                    |
| Snowshoe and Alaska hares  |   |                                    |
| Units 1-5  | Sept. 1 – Apr. 30   | Sept. 1 – Apr. 30                  |
| Units 6 – 26, except<br>14(A) and 14(C) and<br>Alaska hares in Unit 9<br><b><u>and Unit 18</u></b><br>No limit | No closed season  | No closed season                   |
| Unit 9, Alaska hares only<br>1 per day, 4 total  | Nov. 1 – Jan. 30  | Nov. 1 – Jan. 30                   |
| <b><u>Unit 18, Alaska hares only</u></b><br><b><u>2 per day, 6 total</u></b>                                   | <b><u>Aug. 1 – May 31</u></b>   | <b><u>Aug. 1 – May 31</u></b>      |
| Unit 14(A)<br>5 per day  | No closed season<br>(General hunt only)                                 | No closed season                   |
| Unit 14(C)<br>5 per day  | Day after Labor Day–<br>Apr. 30<br>(General hunt only)                  | Day after Labor Day–<br>Apr. 30    |

**What is the issue you would like the board to address and why?** The once-abundant Alaska hare population in Unit 18 is now at very low density. There are small seemingly isolated Alaska hare populations throughout Unit 18 however the majority of Unit 18 residents have raised concern about dramatically lower abundance than historically observed as recent as the 1980s and 1990s. Although there are no estimates of abundance, indices, or surveys for Alaska hares in Unit 18,

regulations should be updated to address the customary and traditional uses, low density, possibly declining status, lack of knowledge on abundance and trend, and biological concern for this species. The proposal may result in a slight decrease in hunting opportunity; however, when climatic and habitat conditions are favorable for Alaska hares, a low hunter harvest could protect localized populations for quicker recovery and recolonization. The Board of Game has not yet addressed customary and traditional uses of Alaska hares in Unit 18.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F19-180)  
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**PROPOSAL 16**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Extend the hunting season for brown bear in Unit 18 as follows:

We recommend that brown bear seasons close on June 30.

**5 AAC 85.020 Hunting seasons and bag limits for brown bear.**

Unit 18

1 bear every regulatory year by Sept. 1 - May 31 No open season.  
registration permit.  
(Subsistence hunt only)

1 bear every regulatory year Sept. 1 – **June 30** [MAY 31] Sept. 1 – **June 30** [MAY 31]

**What is the issue you would like the board to address and why?** In Unit 18, brown bear season closes on May 31, while black bear baiting season closes on June 30. This leaves a month of baiting where it’s legal to hunt black bears, but illegal to hunt brown bears. This proposal would eliminate confusion in the regulations and reduce hunter brown bear conflict at bait stations during the month of June. This would also increase the opportunity that bear baiters have to harvest brown bears.

**PROPOSED BY:** Bethel Fish & Game Advisory Committee (EG-F19-032)  
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**PROPOSAL 17**

**5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Change the opening date for bear baiting in Unit 18 as follows:

For Unit 18:  
Registering bear bait stations start date March 15;  
Bait may be placed at the site starting April 1.

**What is the issue you would like the board to address and why?** I would like to change the start date for bear baiting in Unit 18. Register bait site starting March 15 and deploying bait starting April 1.

Travel conditions in mid-April are too dangerous to deploy bait most years. By the time the river is safe for boating, it is the middle of May and very little time is left before the fur quality on bear start to diminish. Brown bears tend to take long to start hitting the bait and very little real opportunity exist to harvest a brown bear over bait because of travel conditions and time it takes the bears to find the bait. Being able to put bait out earlier would be a lot safer and might increase the chance of a hunter getting a high-quality fur and or a good opportunity at a brown bear. The number of people hunting bears over bait is small and this change would not affect the overall harvest of bear in the unit significantly.

**PROPOSED BY:** Sam Hancock (EG-F19-042)

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### **PROPOSAL 18**

#### **5 AAC 92.210. Game as animal food or bait.**

Allow the use of game bird wings and backs to be used for trapping bait in Unit 18 as follows:

I recommend that bird wings of all game birds including swan, geese, and cranes including the humerus, radius and ulna, and the meat of the humerus radius and ulna be allowed other human uses such as trapping bait in Unit 18. The back and the meat of the back should also be used for other human uses like trapping.

**What is the issue you would like the board to address and why?** I would like to be able to use all bird wings and backbones from swan, cranes, and geese for trapping bait in Unit 18. Bird wings and carcasses, including the backbone, have a long historical use for trapping, and I would like to be able to continue that use. I feel it is more appropriate to use natural baits rather than bring a bunch of trash into the wilderness like compact discs (CDs) and other shiny bobbles.

**PROPOSED BY:** Sam Hancock (EG-F19-043)

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