

**ALASKA BOARD OF GAME  
REGULATION PROPOSAL FORM | 2019-2020 MEETING CYCLE**

Send completed form to:  
PO BOX 115526, JUNEAU, ALASKA 99811-5526  
FAX (907) 465-6094 or EMAIL [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

<b>BOARD OF GAME REGULATIONS</b> <b>Game Management Unit (GMU) <u>21B</u></b>	
<input checked="" type="checkbox"/> Hunting	<input type="checkbox"/> Subsistence
<input type="checkbox"/> Trapping	Other _____
<b>Does the proposed change affect residents or nonresidents?</b>	
<input checked="" type="checkbox"/> Residents	<input checked="" type="checkbox"/> Nonresidents
<b>Which meeting would you like to submit your proposal to?</b>	
<input type="checkbox"/> Arctic/Western Region (GMUs 18, 22, 23 & 26A)	<input checked="" type="checkbox"/> Interior/Northeast Arctic Region (GMUs 12, 19, 20, 21, 24, 25, 26B & 26C)
<b>Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.</b>	
<b>1. Alaska Administrative Code No. 5 AAC: 92.069</b>	<b>Regulation Book Page No.:</b>
<b>DM 809/810/811 moose draw permit hunt allocation for Upper Nowitna corridor.</b>	
Draw-only permit hunts for both residents and nonresidents reflect a need to limit the number of hunters afield for reasons that could be related to conservation, trophy-quality, hunt aesthetics, crowding etc.	
Whatever the rationale for a draw-only hunt for all user groups, and whatever label is attached to a moose hunt (e.g. subsistence, sport, trophy), resident hunters should have a clear and substantial priority opportunity to participate in that hunt and put meat in their freezer and antlers on their wall.	
However, that isn't the case with the Upper Nowitna moose draw permit hunt (DM 809/810/811) that allocates 50 percent of the permits to nonresidents. This allocation change happened in 2008 when the Board passed proposal 55, which was submitted by Nathan Turner, a guide with exclusive guiding privileges within the Nowitna National Wildlife Refuge.	
The rationale used by the author of Proposal 55 was that when the Board made this a draw only permit hunt (DM 810 – both residents and nonresidents could equally apply) residents were receiving the vast majority of the permits and there was an "inability of local hunting guides, and other historical user groups, to obtain permits for the upper Nowitna area." The proposer further stated that "nonresident hunters now have difficulty in obtaining permits due to the sharp increase of applicants, and few of these awarded permits are actually utilized each season."	
It really should go without saying that if and when hunting guides are having difficulty obtaining clientele for moose draw permit hunts due to more residents applying for a draw permit hunt than nonresidents, that's exactly how it should work according to our state constitution.	
We also don't believe that where we have draw permit hunts for both residents and nonresidents that allocation to nonresidents should ever be based on how many residents utilize their awarded	

draw permits. The Department takes into account that some permits will not be utilized when determining the number of permits to offer.

The author of proposal 55 asked for two things:

1. Allocate 50 percent of the twenty DM 810 permits to nonresidents
2. Require most nonresidents to hire a guide for that hunt

It wasn't enough to just increase the nonresident allocation because moose are not a must-be-guided species under AS 16.05.407. Most nonresidents don't hire a guide to hunt moose. By requiring most nonresidents must hire a guide, and jacking up the nonresident allocation, this guide would ostensibly be assured business every year, to the detriment of resident hunting opportunity.

Unbelievably, the Board of Game passed proposal 55 in 2008. The 20 original permits under DM 810 were split in half, with 10 permits going to residents (DM 810), 7 going to nonresidents who are required to hire a guide (DM 811) and 3 permits going to nonresidents who are not required to be guided (DM809).

This kind of allocation scenario for a coveted moose draw permit hunt is unconscionable. In the years since the passage of proposal 55, resident hunters have seen their odds of drawing a permit tumble to around 15 percent on average. The DM 811 must-be-guided permit is typically 100 percent chance of drawing in the years there are applicants.

**During the 2017 draw permit period there were ZERO applications for the 2008 DM 811 permit.** Meanwhile, 28 nonresidents applied for the 3 DM 809 permits for unguided nonresidents, and 65 Alaskan residents applied for the 10 DM 810 permits offered to residents. According to the regulation 5AAC 92.069(E)(3), *"if the number of nonresidents applying for permits for either nonresident hunt is insufficient to award the required percentage, the department may award the remaining available nonresident drawing permits to the other nonresident hunt"*

This implies that the 7 DM 811 permits not applied for during the permit process were reallocated to the DM 809 pool. However, in talking with Department staff, somehow similar to Kodiak Island where guides have exclusive guiding privileges, because the regulation in 92.069(E)(3) says "may" instead of "shall," the Department is using other criteria determining that there is no need to actually apply for the DM 811 Permit during the application period; permits are being given out to guided nonresident hunters who didn't apply during the permit application period.

We cannot allow nonresidents in any shape or form to have special rights when it comes to draw permits. Alaskans don't get a do-over if we don't apply on time. If there are no applications during the draw permit application period, then that hunt (DM 811) should be allocated to the resident pool of tags. Everyone should have to apply equally during the draw permit application period.

**3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

**All draw hunts should have a 90/10 percent resident/nonresident allocation, and only the legislature should determine must-be-guided species**

5AAC 92.069(E)(3) is amended to read;

in Unit 21(B), that portion within the Nowitna River drainage upstream from the Little Mud River drainage and within the corridor extending two miles on either side of and including the Nowitna River, the drawing permit hunt is allocated **90 percent** [50 PERCENT] to residents and up to **10 percent** [50 PERCENT] to nonresidents; [THE DEPARTMENT SHALL ISSUE A MAXIMUM OF 75 PERCENT OF THE AVAILABLE NONRESIDENT DRAWING PERMITS TO GUIDED NONRESIDENTS, AND A MINIMUM OF 25 PERCENT OF THE AVAILABLE NONRESIDENT DRAWING PERMITS TO NON-GUIDED NONRESIDENTS; IF THE NUMBER OF NONRESIDENTS APPLYING FOR PERMITS FOR EITHER NONRESIDENT HUNT IS INSUFFICIENT TO AWARD THE REQUIRED PERCENTAGE, THE DEPARTMENT MAY AWARD THE REMAINING AVAILABLE NONRESIDENT DRAWING PERMITS TO THE OTHER NONRESIDENT HUNT;]

**AT MINIMUM RESIDENTS SHOULD BE GIVEN A CHANCE AT ANY UNAPPLIED FOR PERMITS**

5AAC 92.069 is amended to read;

(E)(3) in Unit 21(B), that portion within the Nowitna River drainage upstream from the Little Mud River drainage and within the corridor extending two miles on either side of and including the Nowitna River, the drawing permit hunt is allocated 50 percent to residents and 50 percent to nonresidents; the department shall issue a maximum of 75 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 25 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of nonresidents applying for permits for either nonresident hunt is insufficient to award the required percentage, the department **shall award the remaining available nonresident drawing permits to the resident hunt;** [MAY AWARD THE REMAINING AVAILABLE NONRESIDENT DRAWING PERMITS TO THE OTHER NONRESIDENT HUNT]

**Submitted By:** Resident Hunters of Alaska  
**Individual or Group**

PO Box 60095 Fairbanks, AK 99706

**Address**

**City, State**

**ZIP Code**

(907) 371-7436

info@residenthuntersofalaska.org

**Home Phone**

**Work Phone**

**Email**