

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS
FOR PROPOSALS 198 - 200
CENTRAL/SOUTHWEST REGION IV PROPOSALS
ALASKA BOARD OF GAME MEETING
WASILLA, ALASKA
FEBRUARY 13 - 20, 2015



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, February 13 – 20, 2015 in Wasilla, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

PROPOSAL 198 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal recommends eliminating the current cow moose drawing hunt structure and establishing a new cow moose drawing hunt structure for resident hunters. The antlerless hunt would be divided into two drawing hunts with separate seasons (October 1–31 and March 1–31). The hunts would be triggered when moose populations are above the midpoint of the population objectives for each subunit, and the number of permits issued would be sufficient to allow a harvest of up to one percent of the total cow population.

WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters who successfully apply for a drawing permit are allowed to take 1 antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal redesigns the antlerless moose drawing hunt in Unit 13 by dividing the current hunt into 2 permit hunts with separate seasons and eliminates the cap of 200 permits currently authorized in regulation. The hunts would be triggered when moose populations are above the midpoint of the population objectives for each subunit. The take allowed will be up to one percent of the total cow population in each subunit.

BACKGROUND: The antlerless moose hunts were originally established in 2012 to provide managers with a tool to regulate the moose population within objectives and provide additional harvest opportunity. The board was presented with a similar proposal during the 2013 Board of Game Meeting in Wasilla (Proposal 63). The board adopted the October 1–31 and March 1–31 seasons, but did not instruct the department to follow the other recommendations in this proposal.

The department is authorized to issue up to 200 drawing permits for antlerless moose, but has only issued 10 permits because of a lack of support from some Advisory Committees in Unit 13.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If the board adopts this proposal, the only regulatory change required is the elimination of the permit cap.

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

PROPOSAL 199 – 5 AAC 92.121. Intensive Management Plan V.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal modifies the Unit 13 wolf control program by suspending wolf control activities when the wolf population in the intensive management area falls below 100 wolves, or when the prey population meets or exceeds the midpoint of the subunit population objectives. Wolf control activities would commence again by subunit when prey populations fall below minimum objectives.

WHAT ARE THE CURRENT REGULATIONS? The department currently uses the objective of 135–165 wolves in all of Unit 13 as the trigger to activate or suspend the IM program with the goal of having no fewer than 135 wolves remaining in the spring. The department also includes wolves in Unit 13D in the wolf population assessment.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal sets the trigger for suspending the IM program at approximately 100 wolves in Units 13A, 13B, 13C, and 13E, and removes wolves found in Unit 13D and a portion of Unit 13E from the assessment area. The proposal also removes the number of moose harvested as an objective from the intensive management program, which was authorized because moose are important for human consumptive use.

BACKGROUND: The board considered a similar proposal during the 2013 Board of Game meeting in Wasilla and did not adopt the proposed regulations; however, the department was directed to suspend wolf regulation when the moose population reaches the midpoint of objectives and resuming wolf regulation when the moose population reaches the lower objective. . Aside from this modification and a change that was made to the moose population objective in Unit 13C, the current Unit 13 Intensive Management (IM) regulation closely resembles the plan originally laid out 10 years ago.

The proposal focuses solely on population objectives as triggers for suspension of wolf regulation. While that strategy seems intuitively reasonable, it does not incorporate the best biological strategy, nor does it reflect the goal that IM is implemented to provide high levels of game important for consumptive uses (as opposed to high population levels).

The optimum biological scenario is a moose population that is managed to provide harvests at the higher end of the harvest objectives while maintaining the population towards the lower end of the population objectives. Given that the desired harvest is being obtained, this scenario is optimum because it minimizes food competition for moose at the smaller population size, which in turn leads to larger offspring being produced, earlier and higher rates of reproduction, better overall body condition and nutritional status, and improved resistance to poor weather and disease. The optimum scenario of getting the desired harvest from a smaller population also reduces risk of the population growing beyond objectives and reducing the capability of the habitat through high levels of browsing and grazing.

The department recognizes that the optimum scenario is not always achievable and higher population levels may be necessary to attain harvest objectives. However, the triggers to suspend wolf regulation should not preclude the optimum scenario by forcing higher population levels even when harvest objectives are being met. The department therefore recommends using moose harvest as a trigger to suspend wolf regulation whenever the population is above the lower population objective. The department does not support removing the harvest objective from the criteria to suspend wolf regulation.

The department recommends that the current objectives for wolf numbers be retained with no change to the area it pertains to. The current IM plan specifies that no fewer than 140 wolves (135 was referenced in the proposal) remain in the Unit at the end of the predator reduction effort. Documenting a minimum number of wolves within a small area is very difficult due to wolf movements and non-human caused mortality. The current wolf harvest objectives ensure our ability to quantify and demonstrate that wolves are being managed on a sustainable basis.

DEPARTMENT COMMENTS: . The department is **OPPOSED** to the removal of the moose harvest objective as a trigger for activating or suspending the IM program and to the removal of the requirement to close hunting and trapping when the wolf population is below the minimum objective.

The department does not support changing the wolf population objective or limiting the objective to the IM area. The current wolf objectives have been successfully used to reduce wolf predation on moose, which has allowed the moose population to grow. The assessment of the wolf population relative to the objectives includes wolves located outside of the IM area to provide a refugia for the wolf population and additional safeguards to ensure that wolves are sustainably managed in Unit 13.

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

PROPOSAL 200 – 5 AAC 92.108. Identified big game prey populations and objectives.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal changes the moose population objectives in Units 13D and 13E and the harvest objectives in all Unit 13 subunits as follows:

Table 200-1. Current and proposed Unit 13 moose population and harvest objectives.

	Current		Proposed	
	Population Size Objective	Harvest Objective	Population Size Objective	Harvest Objective
Unit 13A	3,500–4,200	210–420	No Change	245–294
Unit 13B	5,300–6,300	310–620	No Change	265–315
Unit 13C	2,000–3,000	155–350	No Change	100–150
Unit 13D	1,200–1,900	75–190	1,500–2,200	75–110
Unit 13E	5,000–6,000	300–600	5,500–6,500	275–325

WHAT ARE THE CURRENT REGULATIONS? The current population and harvest objectives are listed in the table above.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposed moose population and harvest objectives listed in the table above would be used as the new Intensive Management objectives in Unit 13.

BACKGROUND: The Intensive Management (IM) moose population and harvest objectives for Unit 13 have not been revised since they were originally established in the early 1990s, with the exception of a change that was made to the Unit 13C objective in 2013. Objectives for Unit 13 were originally developed based on projected potential harvest rates of 6–10% from a high sustainable population.

The authors of this proposal believe the current moose populations (Table 200-21) and harvests (Table 200-32) throughout Unit 13 are acceptable. They base their proposed population objectives on current size of the moose populations with some room for growth.

Based on a review of the historic moose trend count data and population estimates, both the current population objectives and the proposed objective ranges are attainable on a subunit basis. Nutritional indices available for the Unit 13 moose population indicate existing moose densities are sustainable. Because there are no biological concerns associated with either set of population objectives the department does not have a recommendation on changing population objectives in most subunits. If the proposed population objectives are adopted, the Unit-wide population objective range would change from 17,000–21,400 to 17,800–22,200.

Similarly the department does not have a recommendation on changing the moose harvest objectives in Unit 13, other than to note that the proposed harvest objectives are more attainable. Moose harvests have increased in Unit 13 from 468 moose in regulatory year 2001 to 713 moose in 2013. Harvest opportunities have been liberalized in recent years, helping to increase the take. The highest historic harvests occurred during the mid 1960s averaging 1,500 moose each year; however, these levels proved unsustainable. Harvests through the mid 1970s were much lower, ranging 620 to 790. Since 1971, annual harvests have exceeded 1,000 moose only five times. If the proposed harvest objectives are adopted, the new Unit-wide harvest objective range would change from 1,050–2,180 to 960–1,194.

The department recommends continued discussion of the harvest objective for Unit 13E. Of the 7,211 mi² in this subunit, nearly 1,400 mi² are within Denali National Park and Preserve, an area where IM does not occur. In addition, there is approximately 1,300 mi² between the middle Susitna and the Talkeetna Rivers where hunter access is currently limited. The remaining 4,500 mi² of Unit13E will continue to support the vast majority of the moose harvested in the subunit. At current harvest levels (180 total moose) the harvest level in Unit13E is 4.0 moose per 100mi². It may not be possible to achieve even the proposed harvest of 275–325 moose annually given existing access.

The proposed harvest objective of 275–325 moose in Unit 13E equates to a harvest level of 6.1–7.2 moose per 100 mi². This is similar to the current harvest of 6.9 moose per 100 mi² (266 total moose) in adjacent Unit 13B. The proposed objective harvest range of 265–315 for Unit 13B equates to 6.9–8.2 moose per 100 mi². If the board wishes to adjust objectives for Unit 13, the department believes the proposed objectives for Unit 13E to be more attainable than the existing objectives.

Table 200-2. Moose population and objectives in Unit 13, regulatory years 2008 through 2013.

Subunit	13A	13B	13C	13D	13E	Total
	3500–	5300–	2000–	1200–	5000–	
Objective	4200	6300	3000	1900	6000	17600–21900
2008	2,500	4,450	1,570	1,940	5,160	15,620
2009	3,530	4,630	1,610	1,900	4,940	16,610
2010	3,490	5,280	1,700	2,280	5,430	18,180
2011	3,890	5,340	1,950	1,950	5,780	18,910
2012	3,650	5,350	1,680	1,950	5,570	18,200
2013	4,000	4,930	1,770	1,500	4,950	17,150

Table 200-3. Moose harvests and objectives in Unit 13, regulatory years 2008 through 2013.

	13A	13B	13C	13D	13E	Total ^a
Objective	210–420	310–620	155–350	75–190	300–600	1050–2180
2008	238	188	61	65	169	735
2009	268	243	105	80	164	860
2010	289	304	97	66	202	958
2011	295	267	113	83	179	937

2012	223	202	93	54	132	704
2013	255	201	59	67	140	713

^a Total includes moose harvests that could not be assigned to a subunit based on the reported location of kill.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposed regulatory change. The department feels that the current and the proposed population and harvest objectives are achievable and can be sustained with the exception of Unit 13E where the proposed population objectives may be more attainable than the existing objective.

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