

**ALASKA DEPARTMENT OF FISH AND GAME**

**STAFF COMMENTS**

**INTERIOR & EASTERN ARCTIC REGION PROPOSALS: 47-54, 57, 58, 61-75, 100-104, 110-116, 124, 132-138, 140, 145-153, 155-157, 163, 167-170, 172-178, 180, 186-189, 191, 193, 194, 196-200. 208, 210, and 211.**

**ALASKA BOARD OF GAME MEETING**

**FAIRBANKS, ALASKA**

**MARCH 15-22, 2024**



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 15-22, 2024 in Fairbanks, 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 47– 5 AAC 92.011. Proxy hunting.** Allow proxy hunting for bison in Units 12, 19, and 20.

**PROPOSED BY:** Ivan Nance

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow people to proxy hunt for bison.

**WHAT ARE THE CURRENT REGULATIONS?** Proxy hunting is currently allowed for caribou, deer, moose in Tier II hunts, any-bull hunts, antlered-bull hunts without antler restrictions, and antlerless moose hunts, emperor geese; and for muskoxen in Tier II hunts. Only residents are allowed to proxy hunt, and the beneficiary must be a resident as well. To be eligible for proxy hunting, the beneficiary must be blind, 70% or greater physically disabled, 65 years of age or older, or be developmentally disabled. Both beneficiary and proxy must have obtained licenses, regardless of age, and any necessary harvest tickets and/or permits before obtaining a Proxy Hunting Authorization form. Additional proxy hunting details can be found in the current Alaska hunting regulations book.

Antler destruction is currently required in all proxy hunts and consists of removing at least one antler from the skull plate, or cutting the skull plate in half to destroy the trophy value. It is required for all antlered species and is required for each animal taken by the proxy hunter (both the proxy hunter's animals the beneficiary's animals), and must occur at the kill site.

There is a negative customary and traditional use finding for bison in Units 11, 19(D), and 20(D) (5 AAC 99.025(a)(1)) and all bison hunting opportunity is done by drawing permit.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Proxy authorization for bison may potentially increase the harvest rates, but since the harvest of bison is controlled by the number of drawing permits issued, it should not affect bison populations in these units.

**BACKGROUND:** The proxy hunt program was established in 1992 under the authority of the state proxy statute (AS 16.05.405) to allow a hunter (the beneficiary) no longer capable of hunting, to assign their (beneficiary) bag limit to another hunter (the proxy). Current statute states that a resident hunter who is blind, at least 70% physically disabled, 65 years of age or older, or developmentally disabled may qualify to have a beneficiary hunt for them by proxy. Proxy authorizations are allowed for all deer hunts, most caribou hunts, some moose hunts, emperor geese and muskoxen in Tier II hunts.

All of the bison harvest in the Interior Region is permitted through the drawing hunt system. There are four bison hunts the Interior Region: DI351 and DI352 in Units 19C and 19D, and DI403 and DI404 in Unit 20D. A resident who is awarded a bison drawing permit hunt is

ineligible to apply for another bison permit for 10 years, and a nonresident who is awarded a bison drawing permit can only win one permit per lifetime. The number of drawing permits awarded for each hunt is based on population information obtained from abundance and composition surveys completed annually. An average of 35 permits are issued annually for DI351/DI352, with an average annual harvest of 25 (range 21-30) bison. An average of 105 permits are issued annually for DI403, with an average harvest of 80 (range 62-97) bison.

Over the past five years an average of 18 individual permit holders for hunts DI351, DI352, DI403, and DI404 are over the age of 65 when they receive their permit. Data to assess the number of hunters who may qualify under the remaining proxy options are not available. It is unlikely an effect will be seen on the bison population because of the draw hunt structure in place.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is allocative and there are no biological concerns because the number of bison harvested is controlled by the number of permits issued. If the board adopts the proposal the department recommends the board determine if trophy destruction should be required for bison and what it would consist of.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 48 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.** Reauthorize the resident grizzly/brown bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

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

**WHAT WOULD THE PROPOSAL DO?** The proposal would reauthorize the current resident tag fee exemptions for brown/grizzly bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

**WHAT ARE THE CURRENT REGULATIONS?** Brown/grizzly bear tag fees and locking tags are not required for residents in Units 12, 19, 20, 21, 24, 25, 26B, and 26C. The customary and traditional use findings and amounts reasonably necessary for subsistence are presented below:

**Customary and traditional use findings, and Amounts Reasonably Necessary for Subsistence Uses, brown bear populations, Region III (5 AAC 99.025 (3)):**

<b>Unit</b>	<b>Finding</b>	<b>Amount reasonably necessary for subsistence</b>
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Unit 12	Negative	
Units 19A and 19B upstream of and excluding the Aniak River drainage, and Unit 19D	Positive	10–15
Units 19A and 19B downstream of and including the Aniak River drainage	Positive	5
Unit 19C	Negative	
Unit 19D	Positive	2–6
Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Use Area and Unit 20C	Positive	1–3
Unit 20D, outside the boundaries of the Fairbanks Nonsubsistence Area	Positive	1–2
Unit 20E	Negative	
Units 21 and 22	Positive	20–25
Units 23, 24, and 26	Positive	25–35
Unit 25A, 25B, 25C	Negative	
Unit 25D	Positive	

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The \$25 resident tag fee exemption would be continued for brown/grizzly bear hunts in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

**BACKGROUND** The Board of Game must annually reauthorize all resident tag fee exemptions. Resident brown bear tag fees were put in place statewide during the mid-1970s to discourage incidental harvest, elevate the status of brown bears to trophies, and to provide revenue. Today, Region III populations are abundant, and brown bears continue to be highly regarded as trophies. Across the region, season dates and bag limits effectively regulate harvest in areas where interest is high.

Eliminating all resident brown bear tag fees throughout Region III simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears

opportunistically. Reauthorizing these tag fee exemptions would allow residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, to legally harvest brown bears. During regulatory years 2012–2022 approximately 26% of brown bears harvested by resident hunters in Region III were taken incidentally to other activities, compared with 11% statewide.

Human-caused mortality of brown/grizzly bears in most areas of Region III is quite low and is assumed to be less than 6% of the population, which is a rate that is sustainable under most ecological circumstances. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed through changes in seasons and bag limits. The presence or absence of tag fees does not appear to have a significant influence on harvest in these areas.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Brown bear numbers appear to be stable in Interior and Northeast Alaska. Resident tag fees that were in place prior to 2010 appeared to have had no effect on regional harvest. Therefore, this proposal does not present a biological concern. As part of this proposal to reauthorize the exemption of resident brown bear tag fees throughout Region III, the department recommends at minimum for continued reauthorization of the tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 49 – 5 AAC 92.044.** Clarify which rivers in Units 12, 19, 20, 21, 24, 25, 26B, and 26C are major rivers for the purposes of bear baiting.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** The proposal is asking for the board to clarify which rivers in the Interior and Eastern Arctic Region are major rivers for the purposes of bear baiting, and therefore in which of those locations a bear bait station can be placed within one mile of a cabin due to the cabin being on the opposite side of the major river.

**WHAT ARE THE CURRENT REGULATIONS?** The current 5 AAC 92.044 (1) regulations read as follows:

- (a) A person may not establish a bear bait station to hunt bear with the use of bait or scent lures without first obtaining a permit from the department under this section.
- (b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:

- (5) (1) a person may establish a black bear bait station, or a black and brown bear bait station in Units 7, 11, 12, 13, 14(A), 14(B), that portion of the remainder of 14(C), excluding Glacier Creek drainage outside of Chugach State Park, 15, 16, 18, 19(A), 19(D), 20(A), 20(B), 20(C), that portion of 20(D) north of the Tanana River, 20(E), 20(F), 21(C), 21(D), 23, 24(C), 24(D), 25(C), and 25(D), only if that person obtains a permit under this section a person may not use bait or scent lures within
- (B) one mile of a
- (i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on the opposite side of a major river system, as identified by the department in the permit, from the bear baiting station;

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proponent is asking the board to identify major river systems in the Interior and Northeast Arctic Region, which the board has already tasked the department with in regulation. The effect of the proposal is unknown as the department has already identified major river systems and has listed them in the Alaska Hunting Regulations and on the Bear Bait Permit.

**BACKGROUND:** When this proposal was put forward, the department had not yet identified the “major river systems” in the Interior and Northeast Arctic Region where bait could be allowed within one mile of a cabin, provided the cabin was on the opposite side of the major river. However, since this issue came up the department identified that bait may be used within 1 mile of seasonally occupied cabins, provided the cabin is on the opposite side of the river from the bait site, in the following areas:

- Units 12, 20, 21, and 25, the Tanana and Yukon rivers

**DEPARTMENT COMMENTS:** The department recommends the board **TAKE NO ACTION** on this proposal because the issue the proponent brought forward has been addressed by the department. The board gave the department the discretion to address this issue specifically to avoid the need for the public to submit proposals. The issue had not been previously addressed because the public had not expressed a desire to bait within one mile of cabins in the specified GMUs.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 50 – 5 AAC 84.270 Furbearer trapping seasons and bag limits.** Extend the marten trapping season Units 12, 19 – 21, 24 and 25.

**PROPOSED BY:** Eastern Interior Regional Advisory Council

**WHAT WOULD THE PROPOSAL DO?** This would extend the marten season by 2 weeks to end on March 15 in Units 12, 19-21, 24 and 25.

**WHAT ARE THE CURRENT REGULATIONS?** The current marten regulations for Units 12, 19 - 21, 24, and 25 can be found in 5 AAC 84.270, and in the *2023–2024 Alaska Trapping Regulations*.

- Season dates are Nov. 1–Last day of Feb.
- No bag limit.
- There is no sealing or reporting requirement for marten taken in those units.

There is a positive customary and traditional use finding for marten in all of Units 12, 19 – 21, 24 and 25, outside of the Fairbanks Nonsubsistence Area, with an ANS of 90% of the harvestable portion.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, an increase in marten harvest is expected.

**BACKGROUND:** Marten are a valuable furbearer species that contribute to trapping activities in Alaska. According to the 2021 Alaska Trapper Questionnaire, it is ranked as the second most important trapping species in Region 3. Chronology of harvest traditionally aligns with significant snowfall and freeze-up which increases access by snow machine. Fluctuations in harvest and trappers may be linked to low fur prices, high gas prices, and other factors unrelated to marten abundance. The department does not have abundance estimates of marten in Region 3; however, trappers who responded to the Trapper Questionnaire for Region 3 indicate fluctuations in abundance transitioning from “common” occurrence during 2018-2019 to “scarce” during 2020-2021.

Extending the trapping season may impact breeding individuals and expose more juveniles to trapping pressures, affecting recruitment rates. Additionally, pelt quality is diminished later in the trapping season.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because this proposal does not create a biological concern. Trapping pressure is currently low due to low fur prices, however if fur prices rebound, effort and take could increase substantially with a longer season. This proposal would also place marten out of alignment with mink and weasel seasons which may lead to enforcement issues.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 51– 5 AAC 84.270. Furbearer trapping seasons and bag limits.** Change the muskrat trapping season in Units 19, 20 (except 20E), 21, 24, 25, 26B and 26C.

**PROPOSED BY:** Stephen Meyers

**WHAT WOULD THE PROPOSAL DO?** This proposal would change muskrat trapping season in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C to align with current trapping season dates for beaver. Specific changes for each unit are:

- **Units 19, 21, 24 and 25:** 61 days of opportunity would be added to the beginning of the season.
- **Units 20A, 20C, and 20F:** 46 days of opportunity would be added to the beginning of the season.
- **Units 20D and 20B remainder:** 56 days would be added to the beginning of the season, but there would be a reduction of 10 days at the end of the season.
- **Units 20B that portion of the Chena River downstream from its confluence with the Little Chena River and Creamer’s Field Migratory Waterfowl Refuge, 26B and 26C:** The muskrat season would be closed because there is no trapping season for beaver.

**WHAT ARE THE CURRENT REGULATIONS?** The current muskrat regulations for Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C can be found in 5 AAC 84.270, and in the 2022–2023 *Alaska Trapping Regulations*. There is no hunting season for muskrats.

- Season dates in Units 19, 20 (except 20E), 21, 24, 25, 26B and 26C: Nov. 1–Jun 10.
- Season dates in Units 12 and 20E: Sept. 20–Jun 10
- No limit for any of the Units.
- There is no sealing or reporting requirement for muskrats.

There is a positive customary and traditional use finding for muskrat in all of Units 19 – 21, 24, 25, and 26 outside of the Fairbanks Nonsubsistence Area, with an ANS of 90% of the harvestable portion.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal will likely lead to an increase in muskrat harvest in the areas that allow for beaver harvest. It would allow muskrats taken while beaver trapping to be retained legally and not considered bycatch. Some areas with high trapping pressure could possibly reduce muskrats in easily accessible areas. Conversely, there would be no opportunity to trap muskrats in units that are currently closed to beaver trapping and will lead to a decrease in muskrat harvest in those units.

**BACKGROUND:** The department does not have abundance estimates of muskrat in Region III, however, trappers who responded to the Trapper Questionnaire for Region III indicate scarce



abundance during 2018-2021. Fluctuations in harvest and trappers may be linked to low fur prices, high gas prices, and other factors unrelated to muskrat abundance.

Currently the regulations are relatively straightforward and aligning them with the beaver trapping season would add days to certain units, reduce days in other units, and close the season all together in a portion of Unit 20B, and in Units 26B and 26C.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because it would close trapping for muskrat in Units 26B and 26C and there is no biological concern that would warrant a closure. The department is **NEUTRAL** on lengthening the season in the other units because there is not a biological concern.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 52– 5 AAC 92.080(7). Unlawful methods of taking game; exceptions.** Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

**WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.080. Unlawful methods of taking game; exceptions.** The following methods of taking game are prohibited:

...

(7) with the aid of

(E) electronically enhanced night vision;

(F) any forward looking infrared device;

There is a positive customary and traditional use finding for wolves in Units 12, 19 – 21, 24, 25, 26B, and 26C outside of the Fairbanks Nonsubsistence Area, with an ANS of 90% of the harvestable portion.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would allow the use of night vision goggles and forward-looking infrared devices when trapping furbearers in Units 12, 19, 20, 21, 24, 25, 26B and 26C. It would also allow the take of furbearer species where firearms are an authorized method of take under a trapping license.

**BACKGROUND:** At the 2016 Statewide Board of Game (board) meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking

infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited. The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. The FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it addresses methods and means. While this technology is not new it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns with increased harvest. The department cannot say what impacts this proposal will have if adopted. However, the department has some concern that harvest may increase and encourages the board to proceed cautiously should the board wish to adopt this proposal.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 53 – 5 AAC 99.025. Customary and traditional uses of game populations.**  
Revise the amount reasonably necessary for subsistence uses for moose in Unit 19A.

**PROPOSED BY:** Central Kuskokwim Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Revise the amounts reasonably necessary for subsistence uses (ANS) for moose in Unit 19A.

**WHAT ARE THE CURRENT REGULATIONS?** Since 2022, Unit 19A has been defined as that portion of Unit 19 in the Kuskokwim River drainage downstream from and including the George River drainage and downstream of and excluding the Downey Creek drainage.

There is currently one Tier II moose hunt in Unit 19A, TM680. The hunt area is within the Kuskokwim River drainage downstream of and including the George River and downstream of and excluding Downey Creek, one antlered bull, September 1–20.

In 2022, the Board of Game (board) divided Unit 19A into two smaller subunits: 19A and 19E. The TM680 hunt area is in effect for all of Unit 19A, while the portion of Unit 19A that is upstream of the TM680 hunt area became Unit 19E. There is a positive C&T finding for moose in Unit 19 outside the Lime Village Management Area, with an ANS of 400–700 moose, including 175-225 moose in units 19A and 19E and 20-24 moose in Unit 19B.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted unit 19A would have an ANS of 175 – 300 moose.

**BACKGROUND:** Prior to 2002, the board established an ANS of 150 – 250 moose in Unit 19 outside of the Lime Village Management Area (LVMA). In 2002, recognizing that this ANS was likely very low, the board revisited the ANS for Unit 19A based on a combination of per capita harvest estimates for Unit 19 residents and reported harvest numbers for Unit 18 hunters. Using these data, the board established an ANS of 30-40 moose in the LVMA and 400-700 in Unit 19 outside of the LMVA. Additionally, the board requested that the department initiate a planning process to address concerns about declining moose numbers in Units 19A and 19B.

The Central Kuskokwim Moose Management Planning Committee (CKMC) was created with members representing Fish and Game Advisory Committees (ACs), guides, transporters, Native organizations, and conservation groups to find a path forward for producing updated biological data and recommend regulatory action that balanced the competing interests in the area. When the board met in 2004, they endorsed the committee’s Central Kuskokwim Moose Management Plan ([https://www.adfg.alaska.gov/static/research/plans/pdfs/final\\_ckmmp.pdf](https://www.adfg.alaska.gov/static/research/plans/pdfs/final_ckmmp.pdf)) and adopted the majority’s recommendations with minor revisions. Based on existing biological data, the board closed all of Unit 19A to nonresidents, eliminating the November and February seasons and creating a Tier I registration hunt for residents.

In 2005, new moose survey data revealed a significant decline in the moose populations in the area and that the harvestable surplus was being exceeded using the registration permit. The department determined there was a harvestable surplus of only 60 moose in western Unit 19A but no harvestable surplus in Unit 19A remainder. At their March 2006 meeting, the board addressed seasons and bag limits in Unit 19A, including proposal 70. That proposal recommended creating a Tier II hunt in the western portion of Unit 19A (downstream of and including the George River and downstream of and excluding Downey Creek) and Unit 19A remainder.

During deliberations, the board decided to manage moose in Unit 19A as a separate population. The board considered two different methods for reconsidering the ANS in Unit 19A while recognizing the limitations of both methods. The first method was based on historical harvest reporting between 1994-2003. The second method eliminated all but the “middle Kuskokwim pattern of subsistence use” by residents of the subunit from their 92-59-BOG findings. After considerable deliberation, the board then modified the ANS for Unit 19A to include 175-225 moose in 19A and 20-24 in 19B.

After continuing disagreement over moose management in Unit 19A, the Central Kuskokwim AC submitted a proposal for the Joint Boards of Fish and Game meeting in 2007 to split the AC. The board adopted proposal 17 and created the new Central Kuskokwim AC (representing the villages of Lower Kalskag, Kalskag, Aniak, Chuathbaluk, and Crooked Creek) and the Stony-Holitna AC (SHAC – representing Red Devil, Sleetmute, Stony River, and Lime Village). This split allowed each AC to take a more independent role in moose management in their respective areas. At the 2022 Statewide Board of Game meeting in Fairbanks, the board subdivided subunit 19A into subunits 19A and 19E, with boundaries that matched the respective Tier II and registration moose hunts in the original, larger area.

The proponent states that they would like to maintain the TM680 hunt structure in order to provide local hunters with more opportunity to meet their subsistence needs. According to 16.05.258(b)(4), when the harvestable surplus of a population is not sufficient to provide for all subsistence uses, then the “appropriate board shall adopt regulations eliminating consumptive uses, other than subsistence uses; [and] distinguish among subsistence users” through a Tier II permit system. The current harvestable surplus in Unit 19A is 220 moose.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of this proposal. Revising the upper end of the ANS range will not require the board to maintain a Tier II in Unit 19A; however, raising the lower end of the ANS range may have that effect. The board could consider allocating available harvestable surplus for conservation purposes to improve the moose population in Unit 19A, thus effectively reducing the number of moose available for harvest in Unit 19A to below the lower end of the ANS range. The board’s action on this proposal may also depend on its action on Proposal 54.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 54 – 5 AAC 99.025. Customary and traditional uses of game populations.**

Review the amount reasonably necessary for subsistence uses for moose in Unit 19.

**PROPOSED BY:** Stony Holitna AC (SHAC)

**WHAT WOULD THE PROPOSAL DO?** Review the amounts reasonably necessary for subsistence uses (ANS) for moose in Unit 19(E).

**WHAT ARE THE CURRENT REGULATIONS?**

There is currently one Tier II moose hunt and one registration permit hunt in Unit 19E.

- TM684 is within the Lime Village Management Area (LVMA), two bulls, August 10–September 25 and November 20–March 31.
- RM682 is within Unit 19E remainder, one antlered bull, September 1–5. A limited number of permits are available and must be obtained in person in Stony River or Sleetmute. Hunters may not possess RM682 if they have received a permit for any other moose hunt in the Kuskokwim drainage.

In 2022, the Board of Game (board) divided Unit 19A into two smaller subunits: 19A and 19E but maintained the current customary and traditional use (C&T) finding and ANS, indicating that they would take up the issue of an ANS for Unit 19E in the next in-cycle meeting. The TM680 hunt area is in effect for all of Unit 19A, while the portion of Unit 19A that is upstream of the TM680 hunt area became Unit 19E. There is a positive C&T finding for moose in Unit 19 with an ANS of 400–700 moose, including 175-225 moose in units 19A and 19E, outside the LVMA

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted Unit 19E would be included in the unit wide ANS of 400-700 moose and separate from the 175-225 ANS for Unit 19A.

**BACKGROUND:** Prior to 2002, the board established an ANS of 150 – 250 moose in Unit 19 outside of the LVMA. In 2002, recognizing that this ANS was likely very low, the board revisited the ANS for Unit 19A based on a combination of per capita harvest estimates for Unit 19 residents and reported harvest numbers for Unit 18 hunters. Using these data, the board established an ANS of 30-40 moose in the LVMA and 400-700 in Unit 19 outside of the LMVA. Additionally, the board requested that the department initiate a planning process to address concerns about declining moose numbers in Units 19A and 19B.

The Central Kuskokwim Moose Management Planning Committee (CKMC) was created with members representing Fish and Game Advisory Committees (ACs), guides, transporters, Native organizations, and conservation groups to find a path forward in producing updated biological data and recommend regulatory action that balanced the competing interests in the area. When the board met in 2004, they endorsed the committee’s Central Kuskokwim Moose Management Plan ([https://www.adfg.alaska.gov/static/research/plans/pdfs/final\\_ckmmp.pdf](https://www.adfg.alaska.gov/static/research/plans/pdfs/final_ckmmp.pdf)) and adopted the majority’s recommendations with minor revisions. Based on existing biological data, the board closed all of Unit 19A to nonresidents, eliminating the November and February seasons and creating a Tier I registration hunt for residents.

In 2005, new moose survey data revealed a significant decline in the moose populations in the area and that the harvestable surplus was being exceeded using the registration permit. The department determined there was a harvestable surplus of only 60 moose in western Unit 19A but no harvestable surplus in Unit 19A remainder. At their March 2006 meeting, the board addressed seasons and bag limits in Unit 19A, including Proposal 70. That proposal recommended creating a Tier II hunt in the western portion of Unit 19A (downstream of and including the George River and downstream of and excluding Downey Creek) and Unit 19A remainder.

During deliberations, the board decided to manage moose in Unit 19A as a separate population. The board considered two different methods for reconsidering the ANS in Unit 19A while recognizing the limitations of both methods. The first method was based on historical harvest reporting between 1994-2003. The second method eliminated all but the “middle Kuskokwim pattern of subsistence use” by residents of the subunit from their 92-59-BOG findings. After considerable deliberation, the board then modified the ANS for Unit 19A to include 175-225 moose in 19A and 20-24 in 19B.

After continuing disagreement over moose management in Unit 19A, the Central Kuskokwim AC submitted a proposal for the Joint Board meeting in 2007 to split the AC. The board adopted proposal 17 and created the new Central Kuskokwim AC (representing the villages of Lower Kalskag, Kalskag, Aniak, Chuathbaluk, and Crooked Creek) and the Stony-Holitna AC (SHAC - representing Red Devil, Sleetmute, Stony River, and Lime Village). This split allowed each AC to take a more independent role in moose management in their respective areas, which was solidified in the board’s action in the 2022 Statewide Board of Game meeting in Fairbanks to further subdivide subunit 19A into subunits 19A and 19E, with boundaries that match the respective Tier II and registration moose hunts in the original, larger area.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. During its action at the Statewide meeting in 2022, the board was clear in their intent to reevaluate the ANS for 19E at the next in-cycle board meeting for the Interior and Eastern Arctic Region. ADF&G staff will present three options for the board’s consideration at the Region III meeting in Fairbanks. As with any ANS reconsideration, the board maintains authority to create an ANS range based on a variety of factors and available data. If the board would like to explore alternatives other than those presented, staff will be ready to respond to those requests.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 55-56

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**PROPOSAL 57 – 5 AAC 92.123 Intensive Management Plans VII. Plans established.**

Update the Unit 19 Intensive Management plan to reflect earlier board action that divided Unit 19A into Unit 19A and 19E, and to bring the plan back into cycle for regular board meetings.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would fix administrative errors created when Unit 19A was divided into Unit 19A and Unit 19E by updating all the labels found in 5 AAC 92.123 from Unit 19A to Unit 19E. It would also change the IM population and harvest objectives to reflect just Unit 19E. Finally, the duration of the plan would be extended to bring it back in cycle with the regular Interior and Eastern Arctic Region board schedule.

**WHAT ARE THE CURRENT REGULATIONS?** The intensive management (IM) plan found in 5 AAC 92.123 was written for Unit 19A. However, the IM plan currently only covers what is now Unit 19E.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, the administrative errors created by dividing Unit 19A would be corrected. The various labels for Unit 19A will be changed to Unit 19E, and the IM population and harvest objectives will be proportionally distributed to reflect the smaller area. Additionally, the proposal extends the duration of the plan until June 30, 2030 and brings it back in cycle with the regular Interior and Eastern Arctic Region board schedule.

**BACKGROUND:** In 2021 the board passed Proposal 171 which divided Unit 19A into two smaller subunits: 19(A) and 19(E). This created various administrative errors including in 5AAC 92.108 and 5 AAC 92.123. Intensive Management is no longer being conducted in Unit 19A, but does occur Unit 19E. Additionally, the current IM plan will expire on June 30, 2026, which is

out of cycle with the regularly scheduled Interior and Northeastern Arctic Region board meetings. Due to Covid-19, the regularly scheduled meeting was postponed by one year, and this IM plan is now out of sync with that cycle. This proposal corrects the identification of the IM areas, changes the IM objectives and brings the IM plan back into alignment with the regularly scheduled board meetings for this area.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. It corrects multiple administrative errors and extends the Unit 19E IM plan to 2030 and brings it back in cycle with the regular Region III board meeting. Dividing Unit 19A into Unit 19A and Unit 19E resulted in the need for some housekeeping changes in regulation. However, the errors caused did not result in a loss of opportunity or impact hunters or trappers in any way and also did not result in the inability for the department to complete its work.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 58 – 5 AAC 92.123. Intensive Management Plans VII. Plans established.**

Establish an intensive management plan in Unit 19A to benefit moose.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a new intensive management (IM) plan for Unit 19A to benefit moose.

**WHAT ARE THE CURRENT REGULATIONS?** There is currently no IM plan for Unit 19A.

Current IM Population and harvest objectives for Unit 19A and 19B combined are 13,500-16,500 and 750-950 respectively. However, these numbers have not been adjusted since the Board of Game (board) divided Unit 19A into Unit 19A and 19E, and Proposal 56 addresses this issue.

There is a positive customary and traditional use finding for moose in Unit 19 and the board determined that 400-700 moose were reasonably necessary for subsistence uses in all of Unit 19, including 175-225 in Units 19A and 19E and 20-24 in Unit 19B.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted a new IM plan would be in effect for Unit 19A for a six-year period. This would include identifying a wolf control focus area and issuing permits to the public to take wolves using aircraft including shooting from the air as well as land and shoot.

**BACKGROUND:** The Board accepted Proposal 205 at the March 2020 Interior and Northeast Arctic Region meeting. The Central Kuskokwim AC submitted this proposal and requested an IM program in Unit 19A. The proposal had no detail other than a request for predator removals and the Board requested the department prepare a feasibility assessment and submit a proposal at the next regularly scheduled meeting.

This area had an active IM program for wolves from regulatory year (RY) 04 – 08, however it was discontinued because of a lack of success removing wolves. Reasons for the lack of success primarily included lack of geographic area due to land status consisting of large amounts of private and federal lands, topography, poor snow conditions, high fuel costs, low pilot availability, and logistics for nonlocal pilots. These challenges remain with one notable exception which is access to private native corporation lands for wolf control, which is now allowed in Unit 19A.

The current IM population and harvest objectives for all of Unit 19A and 19B are 13,500 – 16,500 moose and 750-950 moose, respectively. The board will also consider Proposal 56 at this board meeting to determine the population and harvest objectives for Units 19A, 19B, and 19E. Current harvest in Unit 19A is managed under a Tier II hunt, and 200 TM680 permits are issued annually. There is also an overlapping federal hunt FM1901 and up to 100 permits are issued annually using this permit. Average annual harvest over last 10 years is 125 moose with 100 taken in hunt TM680 and 25 under the federal hunt. The harvestable surplus at 4% for 19A (TM680 permit area) was estimated as 220 moose based on a 2020 survey. Hunter success rate for TM680 averaged 60% during RYs 2018-2022.

Additional details will also be made available for public review in a separate IM operational plan prior to the board meeting.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. However, the feasibility assessment completed by the department concluded there was a low potential to increase moose harvest with wolf control. There are multiple factors which make the take of large numbers of wolves unlikely. During the 5 years of wolf control from RY04 – RY08 only 10 wolves were taken by control pilots. The main factor limiting harvest is the limited opportunity provided by the Tier II permit, not moose population size. If the board wishes to adopt this proposal the board will need to amend it to incorporate the IM population and harvest objectives from Proposal 56 into this IM plan.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 59-60

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**PROPOSAL 61** – 5 AAC 92.123 **Intensive management plans.** Adopt an Intensive Management Plan for Unit 19C and allow for the same day airborne take of wolves in Unit 19C.

**PROPOSED BY:** Andrew Weaver

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a new intensive management (IM) plan in Unit 19C.

**WHAT ARE THE CURRENT REGULATIONS?** There is currently no IM plan in Unit 19C. Unit 19C has a negative IM finding in 5 AAC 92.108.

There is a positive customary and traditional use finding for moose in Unit 19. In Unit 19, that portion outside of the Lime Village Management Area, there is an amount reasonably necessary for subsistence uses (ANS) range of 400-700 animals, including 175-225 in Units 19(A) and 19E, and 20-24 in Unit 19B.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted there would be an IM plan in Unit 19C which would authorize the take of wolves using aircraft.

**BACKGROUND:** Unit 19C currently has a negative IM finding for moose. However, the Board of Game (board) will be considering Proposal 55 to create a positive finding for the unit at the March 2024 Interior and Northeast Arctic Region meeting in Fairbanks.

Access to moose hunting in Unit 19C is almost exclusively conducted with aircraft. Most of the unit is very lightly hunted with the exception of the Farewell RM653 hunt area. In this area there is a unique combination of good access, an extensive trail network, and a high density of moose during the hunting season. Due to these factors, Farewell attracts the majority of the hunters in Unit 19C.

An average of 228 hunters took 124 moose per year between regulatory years (RY)13 – 22. On average, 123 residents harvested 57 moose annually and 104 nonresidents harvested 67 moose annually over that same 10-year period. Effort has increased considerably in recent years and in RY22, 337 hunters took 183 moose with 156 resident hunters taking 73 moose and 181 nonresident hunters taking 110 moose. Nonresidents now make up the majority of the hunters in Unit 19C. In RY23, the board adopted a proposal to change all nonresident hunting in Unit 19C from a registration permit to a drawing permit and capped the number of permits available for issuance at 100, which will limit the nonresident harvest. This limit could result in the number of moose harvested annually to drop below the 100 required in 5 AAC 92.106 for the positive IM finding.

The department does not conduct population estimates in Unit 19C but does conduct composition surveys. The current two-year average bull cow ratio is 27 bulls:100 cows. This ratio has declined in recent years but was as high as 40 bulls:100 cows in 2018. Fall calf cow ratios are chronically low in this area with a 2-year average of 16 calves:100 cows. The low calf cow ratio is indicative of summer bear predation and wolf control alone may not have a substantive effect on the overall population.

At the March 1998 Interior Region Board of Game meeting the board discussed adopting an IM finding for Unit 19C and ultimately adopted a negative finding; one reason given was the lack of access for Unit 19C. Unit 19C is primarily accessed by plane from one large landing strip which makes access from the Anchorage area relatively easy. This could explain why nonresident harvest is higher than resident harvest. It is important to note that moose are not a guide-required species for nonresident hunters. This provides a variety of hunting options for nonresident hunters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. The areas north of the Alaska Range are conducive to aerial wolf take and pilots in the Unit 19D wolf control program would be likely to participate in this program. Unit 19C is remote with no logistical support; however, McGrath is only an hour away with fuel and lodging available. Moose movements are an important factor in Unit 19C with seasonal movements to and from the surrounding mountains in the spring and fall. During the winter, most moose remain in Unit 19C and removing wolves may increase winter survival in the unit.

If the board passes this proposal, the department will need time to complete a feasibility assessment, an intensive management plan with specific program goals and objectives, and an operational plan which includes how to achieve those goals and objectives. As a result, conducting control activities in RY24 is likely unrealistic.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

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**PROPOSAL 62 – 5 AAC 92.123 Intensive management plans.** Establish an Intensive Management Plan for Unit 19C moose.

**PROPOSED BY:** Taiga Resources

**WHAT WOULD THE PROPOSAL DO?** This proposal would create an intensive management (IM) plan for moose in Unit 19C for a 10-year period.

**WHAT ARE THE CURRENT REGULATIONS?** There is currently no IM plan in Unit 19C.

There is a positive customary and traditional use finding for moose in Unit 19. In Unit 19, that portion outside of the Lime Village Management Area, there is an amount reasonably necessary for subsistence uses (ANS) range of 400-700 animals, including 175-225 in Units 19(A) and 19E, and 20-24 in Unit 19B.

Unit 19C has a negative IM finding in 5 AAC 92.108.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted there would be an IM plan in Unit 19C which would authorize the take of wolves using aircraft for a 10-year period.

**BACKGROUND:** Unit 19C currently has a negative IM finding for moose. However, the board will be considering Proposal 55 to create a positive finding for the Unit at the March 2024 Interior and Northeast Arctic Region meeting in Fairbanks.

Access to moose hunting in Unit 19C is almost exclusively by aircraft. Most of the unit is very lightly hunted with the exception of the Farewell RM653 hunt area. In this area there is a unique combination of good access, an extensive trail network and a high density of moose. Due to these factors, the Farewell area attracts the majority of the hunters in Unit 19C.

An average of 228 hunters took 124 moose per year between regulatory years (RY)13 – 22. On average, 123 residents harvested 57 moose annually and 104 nonresidents harvested 67 moose annually over that same 10-year period. Effort has increased considerably in recent years and in RY22; 337 hunters took 183 moose with 156 resident hunters taking 73 moose and 181 nonresident hunters taking 110 moose. Nonresidents now make up the majority of the hunters in Unit 19C. In RY23, the board adopted a proposal to change all nonresident hunting in Unit 19C from a registration permit to a drawing permit and capped the number of permits available for issuance at 100, which will limit the nonresident harvest. This limit could result in the number of moose harvested annually to drop below the 100 required in 5 AAC 92.106 for the positive IM finding.

The department does not conduct abundance surveys in Unit 19C, but does conduct composition surveys. The current two-year average bull cow ratio is 27:100. This ratio has declined in recent years but was as high as 40:100 in 2018. Fall calf cow ratios are chronically low in this area with a two-year average of 16 calves:100 cows. The low calf cow ratio is indicative of summer bear predation and wolf control alone may not have a substantive effect on the overall population.

At the March 1998 Interior Region board meeting the board adopted a negative IM finding for Unit 19C. One reason given was the lack of access for Unit 19C. Unit 19C is primarily accessed by plane from one large landing strip which makes access from the Anchorage area relatively easy. This could explain why nonresident harvest is equal to or higher than resident harvest, especially because moose is not a guide-required species.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. The areas north of the Alaska Range are conducive to aerial wolf take and pilots in the Unit 19D wolf control program would likely participate in this program. Unit 19C is remote with no logistical support; however, McGrath is only an hour away with fuel and lodging available. Moose movements are an important factor in Unit 19C with seasonal movements to and from the mountains in the spring and fall. During the winter, most moose remain in Unit 19C and removing wolves may increase winter survival in the Unit. If the board adopts this proposal the department will complete a feasibility assessment, an intensive management plan with specific program goals and objectives, and an operational plan which includes how to achieve those goals and objectives. If the board adopts this proposal the department will need time to conduct the feasibility assessment and develop the operation plan. As a result, conducting control activities in RY24 is likely unrealistic.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

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**PROPOSAL 63 – 5 AAC 85.045 Hunting seasons and bag limits.** Change RM653 in Unit 19C to a drawing hunt for nonresidents; limit the number of permits available, and shorten the season.

**PROPOSED BY:** Donald and Karla Ruhoff

**WHAT WOULD THE PROPOSAL DO?** This proposal would replace the registration hunt (RM653) in Unit 19C with a draw permit for nonresidents with up to 20 permits available. It would also shorten the season for all hunters with new hunt dates of September 8 – 17.

**WHAT ARE THE CURRENT REGULATIONS?** Currently nonresident moose hunters need to obtain a registration permit to hunt moose in the RM653 hunt area. At the March 2023 Board of Game meeting in Soldotna the board changed the nonresident registration hunt to a drawing hunt, and beginning in RY24 nonresidents will be required to obtain a drawing permit to hunt moose in the RM653 hunt area. The board has authorized up to 100 draw permits for nonresidents annually. The season is currently September 1 – 20 for nonresidents and residents. The bag limit is one bull with a 50” or 4 brow tine bag limit for nonresidents and a spike fork, or 50” or 4 brow tine bag limit for residents.

There is a positive customary and traditional use finding for moose in Unit 19 of 400-700 moose outside of the Lime Village Management Area, including 175-225 in Units 19(A) and 19(E); and 20-24 in Unit 19B.

Unit 19C has a negative IM finding in 5 AAC 92.108.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, nonresidents would be required to obtain a draw permit in the RM653

hunt area with only 20 permits available. The season would be shortened for both residents and nonresidents from a 20-day season to a 10-day season.

**BACKGROUND:** The Farewell RM653 hunt area north of the Alaska Range in Unit 19C is a popular moose hunting destination for both resident and nonresident hunters. For such a remote location there is a unique combination of good access, an extensive trail network and a high density of moose. Due to these factors the area attracts a large number of hunters and in September the area is very busy with both aircraft and ATVs. Poor harvest reporting and heavy hunting pressure in the area led the board to implement a registration permit for all hunters beginning in RY20. With this registration permit we now have excellent reporting which includes both hunter effort and harvest.

In RY22 there were 199 hunters (107 residents and 92 nonresidents) utilizing the RM653 permit with 105 moose harvested (56 residents and 49 nonresidents). Most harvest takes place in the last 10 days of the season; shortening the season would reduce overall harvest by approximately 30%. Annual success rates range from 50–59%, which are extremely high for such a small area (382 mi<sup>2</sup>), and only possible because moose move into and are concentrated in the area every fall for the rut. From RY20-22 there were an average of 75 nonresident hunters per year. This is approximately 45% of all hunters using RM653 and they take an average of 47% of the moose harvested. Composition surveys conducted in the same area in November show declining bull:cow ratios in recent years. The most current two-year average is 27 bulls:100 cows which is below our objective of 30 bulls:100 cows. Recruitment is also low in this area, and the current two-year fall composition is 16 calves:100 cows.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of the proposal, and in general is opposed to an unnecessary reduction in opportunity. At the March 2023 board meeting in Soldotna the board implemented a drawing permit hunt for nonresidents with a limit of up to 100 permits available annually. However, due to the timing of the drawing application period this hunt will not begin until RY24. The department hopes to see an improvement in the bull cow ratio fairly quickly once the number of hunters is reduced.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 64 – 5 AAC 85.045 Seasons and bag limits.** Change the resident and nonresident moose hunting opportunities in the Unit 19C Farewell area to a drawing permit hunt for both residents and nonresidents, and specify the number of permits available for residents, guided nonresidents, and nonguided nonresidents.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, and Jeff Rost

**WHAT WOULD THE PROPOSAL DO?** This proposal would replace the registration permit (RM653) with a draw permit for all hunters in the RM653 hunt area with up to 100 permits available for residents, up to 14 permits for unguided nonresidents, and up to 6 permits for guided nonresidents. A nonresident orientation class would also be required unless accompanied by a registered guide.

**WHAT ARE THE CURRENT REGULATIONS?** Currently moose hunters need to obtain a registration permit to hunt moose in the RM653 hunt area. At the March 2023 Board of Game meeting in Soldotna the board changed the nonresident registration hunt to a drawing hunt, and beginning in RY24 nonresidents will be required to obtain a drawing permit to hunt moose in the RM653 hunt area. The board has authorized up to 100 draw permits for nonresidents annually. The season is currently September 1 – 20 for nonresidents and residents for one bull with a 50” or 4 brow tine bag limit for nonresidents and a spike fork, or 50” or 4 brow tine bag limit for residents.

There is a positive customary and traditional use finding for moose in Unit 19 of 400-700 moose outside of the Lime Village Management Area, including 175-225 in Units 19(A) and 19(E); and 20-24 in Unit 19B.

Unit 19C has a negative IM finding in 5 AAC 92.108.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted all hunters would be required to obtain a drawing permit. There would be an allocation of up to 100 permits available for residents, up to 14 permits for unguided nonresidents, and up to 6 permits for guided nonresidents. This is a 70/30 allocation for unguided/guided nonresidents and nonresidents could only apply to the guided or the unguided hunt. A nonresident orientation class would also be required unless accompanied by a registered guide. This proposal would eliminate subsistence opportunity in Unit 19C since drawing hunts do not count towards providing reasonable opportunity to harvest moose for subsistence uses.

**BACKGROUND:** The Farewell RM653 hunt area north of the Alaska Range in Unit 19C is a popular moose hunting destination for both resident and nonresident hunters. For such a remote location there is a unique combination of good access, an extensive trail network and a high density of moose. Due to these factors the area attracts a large number of hunters and in September the area is very busy with both aircraft and ATVs. Poor harvest reporting and heavy hunting pressure in the area led the board to implement a registration permit for all hunters beginning in RY20. With this registration permit we now have excellent reporting which includes both hunter effort and harvest. In RY22 there were 199 hunters (107 residents and 92 nonresidents) utilizing the RM653 permit with 105 moose harvested (56 residents and 49 nonresidents). Annual success rates range from 50–59%, which are extremely high for such a small area (382 mi<sup>2</sup>), and only possible because moose move into and are concentrated in the area every fall for the rut. Composition surveys conducted in the same area in November show declining bull:cow ratios in recent years. The most current 2-year average is 27 bulls:100 cows which is below our objective of 30 bulls:100 cows. Recruitment is also low in this area, and the

current 2-year fall composition averaged 16 calves:100 cows. The board implemented a drawing hunt for nonresidents beginning in RY24. Only 20 permits will be issued the first year and it is anticipated that bull cow ratios will quickly improve with this reduction in participation.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. At the March 2023 board meeting in Soldotna the board implemented a drawing hunt for nonresidents with a limit of up to 100 permits available annually. However, there was no specific allocation between guided and unguided hunters as requested in this proposal. If the board adopts this proposal and adds a drawing hunt for residents, the department requests clear guidance on the percentage of permits to be allocated to residents and nonresidents. Also, if the board changes the registration hunt to a drawing hunt for residents, the board will need to determine if a reasonable opportunity for subsistence uses exists in Unit 19 outside of 19A and E, 19B, and the Lime Village Management Area.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 65 – 5 AAC 92.123 Intensive management plans.** Reauthorize the Unit 19D Intensive Management (IM) Plan.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would extend the duration of the Unit 19D IM plan until June 30, 2030 and bring it back in cycle with the regular Interior and Northeast Arctic Region board schedule.

**WHAT ARE THE CURRENT REGULATIONS?** Currently the Unit 19D IM plan in 5 AAC 92.123 is set to expire June 30, 2026.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted it would extend the duration of the Unit 19D IM plan until June 30, 2030 and bring it back in cycle with the regular Interior and Northeast Arctic Region board schedule.

**BACKGROUND:** The current intensive management plan for Unit 19D was authorized by the board in March 2020. The plan became active July 1, 2020 and will expire on June 30, 2026. This is out of cycle with the Interior and Northeastern Arctic Region regular board of game meeting schedule. Due to Covid-19, the regularly scheduled meeting was postponed by one year, and this IM plan is now out of sync with that cycle. This proposal brings the IM plan back into alignment with the regularly scheduled board meeting for this area and extends the plan until June 30, 2020.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. It extends the Unit 19D IM plan to bring it back in cycle with the regular Interior and Northeast Arctic Region board schedule.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 66 – 5 AAC 85.045 Hunting seasons and bag limits.** Modify the moose hunting season dates and permit requirements in Unit 19D.

**PROPOSED BY:** McGrath Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would extend the season dates for the RM650 hunt by five days and enlarge the portion of Unit 19D above the Selatna River open with a harvest ticket (upstream of the Selatna River, but excluding two miles on either side from the mouth of the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim, and two miles on either side from the mouth of the South Fork to Nikolai, and two miles either side of the Takotna River from the mouth to the bridge at Takotna). It would also extend the season dates for a harvest ticket in Unit 19D above the Selatna River by 10 days. Finally, this proposal would add a new draw permit for up to 20 cow moose in the portion of Unit 19D above the Selatna River, however it does not specify how many permits should be available.

**WHAT ARE THE CURRENT REGULATIONS?**

	Resident	Nonresident
Unit 19(D), that portion in the Upper Kuskokwim Controlled Use Area		
1 antlered bull by registration permit	Sept. 1 - Sept. 25	No open season.
Unit 19(D), that portion between and including Cheeneetnuk and Gagaryah River drainages, excluding that portion within 2 miles of the Swift River		

**RESIDENT HUNTERS:**

1 antlered bull; or Sept. 1 - Sept. 20

1 antlered bull by registration



permit Sept. 1 - Sept. 25

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side Sept. 1 - Sept. 20

	Resident	Nonresident
Unit 19(D), that portion up-stream of the Selatna River, excluding the Black River		
1 moose by registration permit only, a person may not take a cow accompanied by a calf	Feb 1-Last day of Feb	No open season
Remainder of Unit 19(D)		
1 antlered bull; or	Sept. 1 - Sept. 20	No open season
1 antlered bull by registration		
Permit	Sept. 1 - Sept. 25	No open season.

The board has made a positive customary and traditional use finding for moose in Unit 19 outside the Lime Village Management Area. The amount reasonably necessary for subsistence is 400 to 700 moose, including 175 to 225 moose in Units 19(A) and 19(E), and 20 to 24 moose in Unit 19(B).

Unit 19D-East has a positive Intensive Management (IM) finding with a population objective of 3,000 - 3,500 and a harvest objective of 400 - 600. The remainder of Unit 19D has a positive IM finding with a population objective of 4,000 - 6,000 and a harvest objective of 250 - 600.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

	Resident	Nonresident
Unit 19(D) upstream of the Selatna River,		
1 cow by draw permit only; up to 20 permits may be issued	Sept 1 – Sept 30	No open season
1 antlered bull by registration permit	Sept. 1 - Sept. 30	No open season
1 moose by registration permit only,		

a person may not take a cow accompanied by a calf Unit 19(D) upstream of the Selatna River, but excluding 2 miles on either side from the mouth of the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim, and 2 miles either side from the mouth of the South Fork to Nikolai, and 2 miles either side of the Takotna River from the mouth to the bridge at Takotna.	Feb 1-Last day of Feb	No open season
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1 antlered bull	Sept. 1 - Sept. 30	No open season
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Unit 19(D), that portion between and including Cheeneetnuk and Gagaryah River drainages, excluding that portion within 2 miles of the Swift River

**RESIDENT HUNTERS:**

1 antlered bull; or	Sept. 1 - Sept. 20	
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1 antlered bull by registration permit	Sept. 1 - Sept. 30	
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**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side		Sept. 1 - Sept. 20
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Remainder of Unit 19(D) 1 antlered bull; or	Sept. 1 - Sept. 20	No open season
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1 antlered bull by registration Permit	Sept. 1 - Sept. 30	No open season.
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**BACKGROUND:** The moose population in Unit 19D upstream of the Selatna River has grown in conjunction with ongoing wolf control and the improved habitat created by the Vinasale burn in 2002. In the area immediately around McGrath, moose densities have increased from 0.8 moose/mi<sup>2</sup> in 2001 to 2.2 moose/mi<sup>2</sup> in 2022. In November 2022, the department estimated that bull-to-cow ratio along the river was 25:100, while the ratio in the larger survey area was 40 bulls:100 cows. However, much of this larger area is inaccessible to hunters. In 2023, the two-year average twinning rate was 32%.

As the moose population has increased, additional harvest opportunity has been provided to work towards meeting the Unit 19D intensive management (IM) harvest objectives. The largest change came in 2010 when most of Unit 19D upstream of the Selatna was opened to a general season harvest ticket hunt. This was a significant increase in opportunity, as 92% of the entire area is

now open to a general season hunt. In 2020, a winter registration hunt for cow moose was also implemented to take advantage of growth in the moose population in areas inaccessible during the fall. With both of these changes, there is still an additional harvestable surplus available and this proposal would increase opportunity further.

The IM population objective identified for the portion of Unit 19D upstream of the Selatna river is 6,000 to 8,000 moose and the population objective within the wolf control focus area (WCFA) is 5,600 moose. The current population estimate within the WCFA is approximately 5,900 moose. The harvest objective in the WCFA is 225 moose and from RY18-RY22 an average of 115 moose were harvested.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** providing additional harvest opportunity to make progress toward meeting the IM harvest objectives. However, the department is **NEUTRAL** on the allocative aspects of this proposal. This proposal adds additional days to the September season as well as a new limited drawing permit hunt for cow harvest in September.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 67 – 5 AAC 85.045(a)(17) Seasons and bag limits for moose.** Reauthorize the antlerless moose season in Unit 19D.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would reauthorize the antlerless Unit 19D winter moose hunt.

**WHAT ARE THE CURRENT REGULATIONS?**

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

RESIDENT HUNTERS:

...

1 moose, by registration permit only, a Feb 1 – Last day of Feb.  
person may not take a cow accompanied by  
a calf

There is a positive customary and traditional use finding for moose in Unit 19, outside of the Lime Village Management Area. The amount reasonably necessary for subsistence is 400 to 700 moose, including 175 to 225 moose in Units 19(A) and 19(E), and 20 to 24 moose in Unit 19(B).

Unit 19D-East has a positive Intensive Management (IM) finding with a population objective of 3,000 - 3,500 and a harvest objective of 400 - 600.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would reauthorize the winter hunt in Unit 19D upstream of the Selatna River allowing hunters to harvest antlerless moose.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The moose population in the eastern portion of Unit 19D has approximately doubled since predator removals began in 2003. Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. After hunting in the BCFA reopened, bull-to-cow ratios declined and the current 2-year average is 21 bulls per 100 cows.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Additional harvest opportunity, particularly of cows is available. Winter hunts distribute hunter pressure and allow access to areas that are inaccessible in the fall. This hunt allows the department to provide additional opportunity, while not further depressing bull-to-cow ratios within the BCFA.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 68 – 5 AAC 85.045 Seasons and bag limits for moose.** Allow RM682 permits to be obtained online.

**PROPOSED BY:** Samuel Hancock

**WHAT WOULD THE PROPOSAL DO?** This proposal would make RM682 permits available online.

**WHAT ARE THE CURRENT REGULATIONS?** Currently the department only issues permits in person in the communities of Sleetmute and Stony River.

There is a positive customary and traditional use finding for moose in Unit 19, that portion outside of the Lime Village Management Area with an Amount Reasonably Necessary for Subsistence (ANS) range of 400-700, including 175-225 in Units 19A and 19E, and 20-24 in Unit 19(B).

Units 19A and 19B have a positive Intensive Management (IM) finding with a population objective of 13,500 - 16,500 and a harvest objective of 750 – 950, and the board has Proposal 56

before them at the March 2024 board meeting to determine population and harvest objectives because Unit 19A was recently split into units 19A and 19E.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted hunters would be able to obtain RM682 permits on the internet. It is unclear from the proposal if they would also still be available in person in Sleetmute and Stony River.

**BACKGROUND:** Because of declining moose numbers, in 2006 the board implemented a Tier II moose hunt in Unit 19A. In the same year, the board determined there was no harvestable surplus in Unit 19E based on department survey data, and closed it to all moose hunting, except the TM884 area. Unit 19E, with the exception of TM684, was closed to moose hunting for 13 years, until March 2019, when the board reopened a 5-day season under registration hunt RM682. Since that time, moose numbers have slowly increased in the RM682 hunt area. In a March 2023 geospatial population estimator (GSPE) survey the department estimated approximately 2,700 moose (0.8 moose/mi<sup>2</sup>). The current bull:cow ratio is 40:100.

The board opened RM682 in a conservative fashion, including several restrictions found in board findings 2019-225-BOG. This included making permits available only within the hunt area in the communities of Sleetmute and Stony River during the month of July.

On average, 17 hunters harvested 7 moose per year since 2019. This harvest takes place almost entirely within the bear control focus area (BCFA) where the harvestable surplus is approximately 60 moose. The BCFA encompasses portions of the Holitna River and the Kuskokwim River between Sleetmute and Stony River. This area has the highest densities of moose, as well as the best access for boaters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal as it addresses an allocation issue. There are additional moose available to harvest, however the board would need to modify the findings in 2019-225-BOG to allow the issuance of permits on the internet. It is unclear from the proposal if permits would continue to be available in person in Sleetmute and Stony River. Depending on board findings, the department may need guidance on the percentage of permits to be issued online versus in person.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 69 – 5 AAC 85.045 Seasons and bag limits for moose.** Allow RM682 permit holders to hold other moose hunting permits in the Kuskokwim River drainage.

**PROPOSED BY:** Samuel Hancock

**WHAT WOULD THE PROPOSAL DO?** If a hunter has a RM682 permit, they may still receive any other moose hunting permit in the Kuskokwim river drainage. This includes TM680, TM684, RM615, RM650, RM653, RM655 and RM660.

**WHAT ARE THE CURRENT REGULATIONS?** Currently board finding 2019-225-BOG states hunters that obtain a RM862 permit may not obtain another moose permit in the Kuskokwim River drainage that regulatory year.

There is a positive customary and traditional use finding for moose in Unit 19, that portion outside of the Lime Village Management Area with an Amount Reasonably Necessary for Subsistence (ANS) range of 400-700, including 175-225 in Units 19A and 19E, and 20-24 in Unit 19(B).

Units 19A and 19B have a positive Intensive Management (IM) finding with a population objective of 13,500 - 16,500 and a harvest objective of 750 – 950, and the board has Proposal 56 before them at the March 2024 board meeting to determine population and harvest objectives because Unit 19A was recently split into units 19A and 19E.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted hunters could obtain a RM682 permit as well as any other permit for which they are eligible in the Kuskokwim River drainage.

**BACKGROUND:** Because of declining moose numbers, in 2006 the board implemented a Tier II moose hunt in Unit 19A. In the same year, the board determined there was no harvestable surplus in Unit 19E based on department survey data, and closed it to all moose hunting, except the TM884 area. Unit 19E, with the exception of TM684, was closed to moose hunting for 13 years, until March 2019, when the board reopened a 5-day season under registration hunt RM682. Since that time, moose numbers have slowly increased in the RM682 hunt area. In a March 2023 geospatial population estimator (GSPE) survey the department estimated approximately 2,700 moose (0.8 moose/mi<sup>2</sup>). The current bull:cow ratio is 40:100.

The board opened RM682 in a conservative fashion, including several restrictions found in board findings 2019-225-BOG. This included making permits available only within the hunt area in the communities of Sleetmute and Stony River during the month of July.

On average, 17 hunters harvested 7 moose per year since 2019. This harvest takes place almost entirely within the bear control focus area (BCFA) where the harvestable surplus is approximately 60 moose. The BCFA encompasses portions of the Holitna River and the Kuskokwim River between Sleetmute and Stony River. This area has the highest densities of moose, as well as the best access for boaters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal as it addresses an allocation issue. Hunters currently can choose to hunt under RM682 if they wish, but if they do, they cannot hunt moose elsewhere in the Kuskokwim drainage that regulatory year. If the board adopts this proposal, they will need to modify the findings in 2019-225-BOG to allow

hunters to receive more than one moose hunting permit in the Kuskokwim. The board opened this hunt in a conservative way. The requirement for hunters who choose to get a RM682 and to forfeit getting a different permit was specifically put in place to keep the number of participating hunters low and reduce user conflicts. In RY22 for example, 1,542 hunters obtained a RM615 permit in Unit 18. Current regulations prohibit that large pool of potential hunters from obtaining a RM682 permit.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 70** – 5 AAC 85.045 Seasons and bag limits for moose. Make 15 of the RM682 permits available in Bethel.

**PROPOSED BY:** Mike Glore

**WHAT WOULD THE PROPOSAL DO?** This proposal would make fifteen RM682 permits available in Bethel.

There is a positive customary and traditional use finding for moose in Unit 19, with an Amount Reasonably Necessary for Subsistence (ANS) range of 400-700, including 175-225 in Units 19A and 19E. There is also a positive customary and traditional use finding for Unit 18, with an ANS range of 200-400.

Units 19A and 19B have a positive Intensive Management (IM) finding with a population objective of 13,500 - 16,500 and a harvest objective of 750 – 950, and the board has Proposal 56 before them at the March 2024 board meeting to determine population and harvest objectives because Unit 19A was recently split into units 19A and 19E.

**WHAT ARE THE CURRENT REGULATIONS?** Currently the department only issues permits in person in the communities within the RM682 hunt area. These include Sleetmute and Stony River.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, permits would still be issued in person in Sleetmute and Stony River, but fifteen RM682 permits would also be available in Bethel.

**BACKGROUND:** Because of declining moose numbers, in 2006 the board implemented a Tier II moose hunt in Unit 19A. In the same year, the board determined there was no harvestable surplus in Unit 19E based on department survey data, and closed it to all moose hunting, except the TM884 area. Unit 19E, with the exception of TM684, was closed to moose hunting for 13 years, until March 2019, when the board reopened a 5-day season under registration hunt RM682. Since that time, moose numbers have slowly increased in the RM682 hunt area. In a

March 2023 geospatial population estimator (GSPE) survey the department estimated approximately 2,700 moose (0.8 moose/mi<sup>2</sup>). The current bull:cow ratio is 40:100.

The board opened RM682 in a conservative fashion, including several restrictions found in board findings 2019-225-BOG. This included making permits available only within the hunt area in the communities of Sleetmute and Stony River during the month of July.

On average, 17 hunters harvested 7 moose per year since 2019. This harvest takes place almost entirely within the bear control focus area (BCFA) where the harvestable surplus is approximately 60 moose. The BCFA encompasses portions of the Holitna River and the Kuskokwim River between Sleetmute and Stony River. This area has the highest densities of moose, as well as the best access for boaters.

In 2018 the department conducted twinning survey and estimated a twinning rate of 65%. We have no indication that habitat is limited at this time, or that that moose are in poor nutritional condition.

The board opened RM682 in a conservative fashion and made findings found in 2019-225-BOG. This included making permits available only within the hunt area during the month of July.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of this proposal. If adopted, the board would need to modify the findings in 2019-225-BOG to allow the issuance of permits in Bethel. Additionally, if this proposal passes the department will need guidance on the allocation of permits available in the hunt area as opposed to in Bethel. For example, if passed as written, this proposal would require the department to issue 15 permits in Bethel even if only 15 permits were available. In that scenario, no permits would be issued in the hunt area. Alternatively, if the board desired permits to be issued in Bethel, a percentage of total permits could be allocated for issuance in Bethel based on the department's determination of total harvestable surplus in a given year. The board may also wish to take no action on this proposal depending on action taken on Proposal 68, which asks for permits for RM682 to be available online.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 71– 5 AAC 92.540(7)(B). Controlled use areas.** Eliminate the Holitna-Hoholitna Controlled Use Area.

**PROPOSED BY:** Samuel Hancock

**WHAT WOULD THE PROPOSAL DO?** Eliminate the Holitna-Hoholitna controlled use area (HHCUA).



**WHAT ARE THE CURRENT REGULATIONS?** The HHCUA consists of the Holitna River downstream from Kashegelok, the Titnuk Creek downstream from Fuller Mountain and the Holitna River downstream from the confluence of the South Fork and the main Holitna River. The area is closed to the use of any boat equipped with inboard or outboard motor(s) with an aggregate horsepower in excess of 40 horsepower for taking big game, including transportation of big game hunters, their gear, and/or parts of big game from August 1 through November 1.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, the HHCUA would be eliminated, and big game hunters would be permitted to use any boat motor configuration regardless of horsepower rating.

**BACKGROUND:** The HHCUA was established by the board in 1992 primarily to reduce user conflicts between Unit 18 hunters and the current Unit 19E hunters as well as to reduce disturbance of moose along the river. Moose hunting was reestablished in the Holitna and Hoholitna drainages in RY19 after a 13-year closure from RY06–RY18. If the HHCUA were eliminated, the historical user conflicts for which the CUA was created to address may return.

In 2002 the department formed the Central Kuskokwim Moose Management Planning Committee (CKMC), a diverse group of individuals representing resident subsistence hunters; area state fish and game advisory committees; state, federal, and tribal agencies; big game guides and transporters; and conservation organizations. Some of the primary objectives of the CKMC were to review biological and harvest information of moose in Units 19A, 19B, and 19E, and make recommendations that would ensure reasonable subsistence opportunities, and provide for high levels of human consumptive uses. The CKMC’s recommendations guided the department’s development of the Central Kuskokwim Moose Management Plan (CKMMP), which was written to address these concerns over the moose populations in Units 19A, 19B and 19E. The existence of the HHCUA was one of the key regulations identified by the CKMC. Proposals to eliminate the HHCUA were submitted to the board in 1994, 2008, 2017, and 2020, but all these proposals failed because the board recognized the continued importance of the HHCUA.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it addresses methods and means, and user conflicts. The board established a conservative registration permit hunt (RM682) in RY19, which included continuation of the 40-horsepower restriction within the HHCUA. Additionally, with moose hunting reestablished after a 13-year closure (RY05–RY18), the historical user conflicts for which the HHCUA was created to address may return if it were eliminated.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 72 – 5 AAC 92.540(7)(B). Controlled use areas.** Modify the horsepower restrictions within the Holitna-Hoholitna Controlled Use Area.

**PROPOSED BY:** Mike Glore

**WHAT WOULD THE PROPOSAL DO?** Modify the Holitna-Hoholitna controlled use area (HHCUA) to allow the use of 40 horsepower motors between September 1 – 30 and greater than 40 horsepower motors between September 10 – 20.

**WHAT ARE THE CURRENT REGULATIONS?** The HHCUA consists of the Holitna River downstream from Kashegelo, the Titnuk Creek downstream from Fuller Mountain and the Holitna River downstream from the confluence of the South Fork and the main Holitna River. The area is closed to the use of any boat equipped with inboard or outboard motor(s) with an aggregate horsepower in excess of 40 horsepower for taking big game, including transportation of big game hunters, their gear, and/or parts of big game from August 1 through November 1.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** It is unclear the exact intent of this proposal. The HHCUA applies to all big game hunters and is in place from August 1 – November 1. The proposal specifies the dates of September 1-30 for 40 hp motors, and September 10-20 for greater than 40hp motors, which indicates that the proposal is referring to moose hunting which typically takes place in the month of September. However, the moose hunting season within Unit 19E is only open from September 1 – September 5. Therefore, a change to allow motors in excess of 40 horsepower would not affect moose hunters as written. The proposal would allow a big game hunter for species other than moose, such as black bears, to access the area from September 10 – 20. It is also unclear if the proponent wants to change the time frame for the HHCUA to just the month of September, or if the proposal is requesting a modification for the entirety of the current HHCUA

**BACKGROUND:** The HHCUA was established by the board in 1992 primarily to reduce user conflicts between Unit 18 hunters and the current Unit 19E hunters, as well as to reduce disturbance of moose along the river. Moose hunting was re-established in the Holitna and Hoholitna drainages in RY19 after a 13-year closure from RY06–RY18. If the HHCUA were eliminated, the historical user conflicts for which the CUA was created to address may return.

In 2002 the department formed the Central Kuskokwim Moose Management Planning Committee (CKMC), a diverse group of individuals representing resident subsistence hunters; area state fish and game advisory committees; state, federal, and tribal agencies; big game guides and transporters; and conservation organizations. Some of the primary objectives of the CKMC were to review biological and harvest information of moose in Units 19A, 19B, and 19E, and make recommendations that would ensure reasonable subsistence opportunities, and provide for high levels of human consumptive uses. The CKMC's recommendations guided the department's development of the Central Kuskokwim Moose Management Plan (CKMMP), which was written to address these concerns over the moose populations in Units 19A, 19B and 19E. The existence of the HHCUA was one of the key regulations identified by the CKMC. Proposals to eliminate the HHCUA were submitted to the board in 1994, 2008, 2017, and 2020, but all these proposals failed because the board recognized the continued importance of the HHCUA.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this proposal because it addresses methods and means, and user conflicts, and we have no biological concern. The board established a conservative registration permit hunt (RM682) in RY19, which included continuation of the 40-horsepower restriction within the HHCUA. The exact intent of this proposal is difficult to assess, but it appears to be aimed at allowing hunters a 10-day window to operate within the HHCUA with a motor larger than 40 horsepower. With the current moose season in place this would only benefit hunters looking to harvest other big game.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 73 – 5 AAC 92.124 Intensive Management Plans VIII.** Reauthorize the Unit 21E Intensive Management (IM) plan.

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would extend the current Unit 21E IM plan with a new expiration date of June 30, 2030.

**WHAT ARE THE CURRENT REGULATIONS?**

(a) Plans established. Intensive management plans for the following areas are established in this section:

(b) Unit 21(E) Predation Control Area.

...

(6) time frame is as follows:

(A) through June 30, 2024, the commissioner may authorize removal of wolves and black and brown bears in Unit 21(E);

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted the 21E IM plan would be extended for six years with a new expiration date of June 30, 2030.

**BACKGROUND:** Residents of Unit 21E; the Grayling, Anvik, Shageluk, Holy Cross Advisory Committee (GASH AC); and other hunters who use the area expressed concern about a perceived decline in the moose population during the mid-1990s. To address this concern, in January 2005, the department established a citizen-based working group. The working group was asked to review all available information and to develop a comprehensive moose management plan for the area. The final product was the Yukon–Innoko Moose Management Plan, which included the following mission statement: “Maintain healthy and abundant moose populations by proactively managing moose, predation, and habitat, and keeping moose harvest within sustained yield so that subsistence needs for moose are met on an annual basis, and there is sufficient moose to provide for personal and family use by Alaska residents and some nonresident hunting opportunity for

generations to come.” This plan was endorsed by both the Board of Game (board) and the Federal Subsistence Board in 2006.

Because proactive management was a major tenet of the plan, the working group recommended an aerial wolf control program to prevent further declines in moose densities and maintain hunting opportunities in Unit 21E. Following this recommendation, the board adopted an IM plan in March 2010 authorizing wolf control if the moose population declined below 1.0 observed moose/mi<sup>2</sup>. This plan expired in June 2016 and a subsequent plan was authorized by the board in March 2017. The current plan was authorized for a 6-year period from July 1, 2017 – June 30, 2023 but was extended for 1 year to bring it back in cycle with the regular Interior and Northeastern Arctic Region meeting in 2024. The current plan expires June 30, 2024, and authorizes predator control if a GSPE point estimate in the wolf control focus area (WCFA) falls below 1.0 moose/mi<sup>2</sup> corrected for sightability, and twinning rates are still >20%.

The IM population objectives for Unit 21E are 9,000 – 11,000 moose with a harvest of 550 – 1,100 moose annually. The current IM plan has a population objective of 1.0 moose/mi<sup>2</sup> in the WCFA with a harvest of 165 moose annually. The most recent GSPE survey in 2022 estimated 9,300 moose (1.2/mi<sup>2</sup>) in Unit 21E and a density of 1.9 moose/mi<sup>2</sup>, corrected for sightability, in the WCFA. The population is well above the stated objective for the WCFA, harvest is 175 moose annually, and wolf control is not being considered at this time.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal to keep the IM plan in regulation, even though it is unlikely IM will be needed in the immediate future. IM has never been active in Unit 21E but has remained in regulation to ensure the department can remain proactive with the tools necessary to address any future decline in the moose population. The moose population in Unit 21E remains above the population objective and the harvest objective is being met.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 74 – 5 AAC 85.045(19). Hunting season dates and bag limits for moose.**

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross (GASH) Fish and Game Advisory Committee (AC)

**WHAT WOULD THE PROPOSAL DO?** This proposal would require a unique verification code (UVC) for all hunters applying to the DM837 draw hunt for moose in Unit 21E.

**WHAT ARE THE CURRENT REGULATIONS?** Currently all nonresidents hunting moose in Unit 21E must obtain a draw permit. Nonresidents may apply for either DM837, which prohibits the use of a guide, or DM839, which requires the use of a guide. All hunters applying for DM839 must have a signed guide/client contract and must enter a UVC provided by the Big

Game Commercial Services Board as part of their draw application. UVCs are issued to guides for each Guide Use Area they are registered for and able to conduct guiding activities in.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted all hunters applying for a DM837 permit would be required to enter a UVC as part of their drawing permit application.

**BACKGROUND:** The Yukon Innoko Moose Management Plan was approved by the Board of Game (board) in 2006 and is currently used to guide moose management decisions in Unit 21E. The plan recommended a nonresident drawing permit for moose in Unit 21E but made no recommendation for an allocation between unguided and guided hunters. The board decided to allocate a percentage of the permits to guided hunters and the remainder to unguided hunters.

The drawing hunt for nonresident moose hunters in Unit 21E began in regulatory year 2007. In 2010, the board extended the nonresident season by 5 days, to September 25, to allow for more opportunity. In 2014, the board changed the allocation of unguided to guided permits from an 80/20 split to a 70/30 split. This was meant to address the undersubscribed nonguided hunt by allocating more permits to guided hunts which had a high level of demand. The department currently issues 60 total permits with 42 DM837 permits and 18 DM839 permits.

The GASH AC has concerns over unlicensed transporters taking DM837 permit holders into the field.

**DEPARTMENT COMMENTS:** The department recommends the board **TAKE NO ACTION** on this proposal because transporters are managed by the Big Game Commercial Services Board. There is no biological concern with moose harvest in Unit 21E and nonresident harvest is carefully regulated through the drawing hunt process. Transporters are currently not issued UVCs making this an issue that the Big Game Commercial Services Board would need to address before implementation of this proposal.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 75 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 21E.

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

**WHAT WOULD THE PROPOSAL DO:** This proposal would reauthorize the antlerless winter moose hunt in Unit 21E.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations as defined in 85.045(a) are:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(19)

Unit 21(E)

RESIDENT HUNTERS:

...

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

Feb 15 – Mar 15

...

There is a positive customary and traditional use finding for moose in Unit 21. The amount reasonably necessary for subsistence is 600 to 800 moose (5 AAC 99.025(8)).

Unit 21E also has a positive Intensive Management (IM) finding with a population objective of 9,000 – 11,000 moose and a harvest objective of 550 – 1,100.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, the antlerless moose season for 21E (RM837) would be reauthorized. Antlerless hunts will continue to be available to hunters, and the department will continue to have the ability to use antlerless hunts as a tool to regulate the moose population.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The goals of this hunt are to provide additional harvest opportunity, meet harvest objectives, and stabilize the 21E moose population.

The most recent survey (2022) indicated there were 9,300 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000-11,000 moose. Bull-to-cow ratios are high, with 46 bulls per 100 cows.

Within the Unit 21E moose survey area (4,094 mi<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 1.9 moose/mi<sup>2</sup> in 2022. During most of these years of growth, twinning rates remained high; however, twinning rates began declining in 2015. Since 2019 twinning rates began

to improve and the 2-year average twinning rate in the Holy Cross area is now 26%. Browse utilization remains high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

Additional harvest opportunity is available, particularly in the area around Holy Cross. Harvest in areas of high browse utilization reduces pressure on moose in those areas during deep snow winters.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. There are additional moose that can be harvested, and this proposal will help meet harvest objectives.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 76-99

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**PROPOSAL 100 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Lengthen the brown bear hunting season in Unit 19E.

**PROPOSED BY:** Stony Holitna Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to remove the closed season for residents in Unit 19E from July 1 – August 9.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 19E

Residents:

- Two brown bears
- Aug 10 – June 30
- Cubs and sows with cubs may not be taken.
- No resident locking tag is required.
- All bears harvested must be sealed.

There is no customary and traditional use (C&T) finding by the Board of Game (board) for brown bears in Unit 19E; however prior to the board dividing Unit 19A into units 19A and 19E, the board did make a positive C&T finding for Unit 19A as part of a finding for a larger area that includes a portion of units 17(B), 17(C), and 19(D). Because the board has made a finding already for brown bear in the geographic area now renamed as Unit 19(E), the board does not

need to address the lack of a C&T finding here as the administrative record will be updated to reflect the existing finding. may wish to correct that in the administrative record.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** There would be no closed season for brown bears for residents. There would be no change in the season for nonresidents.

**BACKGROUND:** Brown bears are widely distributed with varying densities across Unit 19. In 2022, the board split Unit 19A into 2 separate units. The eastern portion of Unit 19A became Unit 19E, though a C&T determination for Unit 19E has not yet been made by the board. Prior to the split of Unit 19A there was no C&T finding for brown bear upstream of the Aniak drainage. The average reported harvest from regulatory year (RY) 18 – 22 (where RY18 = July 1, 2018 through June 30, 2019) in Units 19A and 19E is about 3 bears annually. Residents harvested 56% of the total harvest.

Population surveys have not been conducted in Unit 19 and estimates of the bear population are based on extrapolated densities of similar habitats from other surveys. The brown bear population in Unit 19 is thereby estimated to be 900-1,250 brown bears. Sows with cubs and cubs cannot be harvested, which ensures adequate protection of brown bears in these subunits.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal. There are no biological concerns for brown bears in Unit 19E and harvest is extremely low. In the last 10 years there has only been one reported defense of life and property (DLP) incident. However, it is likely bears are taken at fish camps that are not reported. If the board passes this proposal there may be a small amount of incidental harvest by people fishing along the river during the salmon runs in July and early August. The board may wish to consider evaluating the customary and traditional use patterns for brown bears in Unit 19E. The board may also want to consider keeping Units 19A, 19D, 19E, 21A, and 21E harvest regulations aligned for consistency to avoid unnecessary regulatory complexity.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 101 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Also 5 AAC 92.085. Unlawful methods of taking big game; exceptions.** Allow the use of bait for brown bears in Unit 19C, and allow the same-day-airborne hunting of brown bears at bait stations.

**PROPOSED BY:** Spencer Pape, Seth Kroenke, Jeff Rost



**WHAT WOULD THE PROPOSAL DO?** This proposal would allow brown bears to be taken over bait in Unit 19C from April 15 – May 31 and allow for same-day-airborne hunting of brown bears at a bait station provided the hunter is at least 300 feet from the airplane.

**WHAT ARE THE CURRENT REGULATIONS?**

Black bear bait stations may be established in Unit 19C from Apr 15 – June 30.

Black bear regulations in Unit 19C are as follows:

Residents and nonresidents:

- Three black bears
- No closed season
- Cubs and sows with cubs may not be taken.

Brown bear regulations in Unit 19C are as follows:

Residents and nonresidents:

- One brown bear
- September 1–May 31
- Cubs and sows with cubs may not be taken.
- No resident locking tag is required.
- All bears harvested must be sealed.

There is a negative customary and traditional use finding for brown bears in Unit 19C (5AAC 99.025(3)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would allow the harvest of brown bears over bait and for same-day-airborne hunting of brown bears at a bait station provided the hunter is at least 300 feet from the airplane.

**BACKGROUND:** It is currently legal to take brown bears over bait and on the same day a hunter is airborne in Units 7, 11–13, 14A, 14B, 14C remainder 15–16, 18, 19A, 19D, 19E, 20A, 20B, 20C, 20D north of the Tanana River, 20E, 20F, 21C, 21D, 23, 24C, 24D, 25C and 25D.

Brown bear harvest in Unit 19C is stable with an average of 22 bears taken per year during regulatory years (RY) 18 – 22 (where RY 18= July 1, 2018 through June 30, 2019). Average age and skull size was 6 years and 20.3 inches respectively, and an average harvested sex ratio of approximately 39% females. Most brown bear harvest (77%) occurs in the fall and 74% are

taken by nonresidents. From RY13 – RY22 only 4 black bear bait stations were registered in Unit 19C.

Based on the extrapolation of bear densities in similar habitats, the brown bear population in Unit 19C is estimated at 260 bears. However, observations of brown bears during other surveys and from hunters in the field indicate an increasing population. Cubs and sows with cubs cannot be harvested, ensuring adequate protection of brown bears in this subunit.

In Units 19B and 19C brown bears have historically been targeted for trophy value as compared to Units 19A, 19D, and 19E where bear seasons have been changed to increase opportunity.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** the additional opportunity because there are no biological concerns for brown bears in Unit 19C, and is **NEUTRAL** regarding aspects of this proposal concerning methods and means for taking brown bear in Unit 19C. Passage of this proposal will provide additional hunting opportunity and will likely result in a few additional bears being harvested, but this will not have a significant impact on the bear population and should not be considered a tool to reduce predation on ungulates. If the board chooses to pass this proposal, they may wish to consider keeping Units 19B and 19C aligned for consistency and to simplify regulations for the public.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 102 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Establish a fall bear baiting season in Unit 19E.

**PROPOSED BY:** Daniel Paull

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to create a fall bait season in Unit 19E during August 1 –September 30 and allow the take of both black and brown bear at these stations.

**WHAT ARE THE CURRENT REGULATIONS?**

**Brown bear regulations in Unit 19E are as follows:**

- August 10 – June 30
- Resident hunters 2 bear bag limit, nonresident hunters 1 bear bag limit
- Brown bears may be taken over bait Apr 15 – June 30 and taken the same day airborne provided the hunter is at least 300 feet from the plane.
- No resident locking tag is required.
- All bears harvested must be sealed.

- There is no customary and traditional use (C&T) finding by the Board of Game (board) for brown bears in Unit 19E; however prior to the board dividing Unit 19A into units 19A and 19E, the board did make a positive C&T finding for Unit 19A as part of a finding for a larger area that includes a portion of units 17(B), 17(C), and 19(D). Because the board has made a finding already for brown bear in the geographic area now renamed as Unit 19(E), the board does not need to address the lack of a C&T finding here as the administrative record will be updated to reflect the existing finding. may wish to correct that in the administrative record.

Black bear regulations in Unit 19E are as follows:

- No closed season
- 5 bear bag limit
- Black bears may be taken over bait Apr 15 – June 30 and taken the same day airborne provided the hunter is at least 300 feet from the plane.
- There is a positive C&T finding for black bear with an Amounts Reasonably Necessary for Subsistence of 30 – 50 black bears in all of Unit 19 (5 AAC 99.025(2)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Harvest of brown and black bears at registered bait stations in Unit 19E would be allowed from August 1 – September 30 for both residents and nonresidents.

**BACKGROUND:** Brown bears are widely distributed with varying densities in Unit 19. The board first approved harvest of brown bears at black bear bait stations in Unit 19A in 2017 and in 2022, the board split Unit 19A into 2 separate subunits and the eastern portion of 19A became Unit 19E and the western portion remained as Unit 19A. The average number of bait stations registered from regulatory years (RY)18 – 22 (for Units 19A and 19E is less than 6, and an average annual harvest of 1 brown bear was harvested over bait. The reported annual harvest from nearby Units 19D, 21C and 21D with a fall bear baiting season, shows an average of 1 brown bear harvest over bait in the spring, and no reported harvest from baiting in the fall.

Population surveys have not been conducted in Unit 19 and estimates of the bear population are based on extrapolated densities of similar habitats from other surveys with a current estimate of 900-1,250 brown bears in Unit 19. Sows with cubs and cubs cannot be harvested, which ensures adequate protection of brown bears in these subunits.

There is no sealing requirement or a harvest ticket for black bears in unit 19E, but with an annual average of only 6 black bear sites registered, it's reasonable to conclude that harvest is very low.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal, and there are no biological concerns for brown or black bears in Unit 19E. The board may also want to consider keeping Units 19A, 19D, 19E, 21A, and 21E aligned for consistency and to avoid unnecessary regulatory complexity. While not included in the proposal, if the board is interested in allowing

the take of brown bears over bait in this area it may want to consider also allowing brown bears to be taken at the bait site the same day a hunter has been airborne, to further reduce regulatory complexity.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 103 – 5 AAC 85.015 Hunting seasons and bag limits for black bears.** Increase the bag limit for black bears in Units 19B and 19C.

**PROPOSED BY:** Stony Holmna Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would increase the bag limit for black bears in Units 19B and 19C from three to five bears for residents and nonresidents.

**WHAT ARE THE CURRENT REGULATIONS?**

Black bear regulations in Unit 19B and Unit 19C are as follows:

- No closed season
- 3 bear bag limit (residents and nonresidents)
- There is a positive customary and traditional use finding of 30 – 50 black bears in all of Unit 19 (5 AAC 99.025(2)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The annual bag limit would increase from 3 black bears to 5 black bears for resident and nonresidents in Units 19B and 19C and would align the bag limit with adjacent Units 19A, 19D and 19E.

**BACKGROUND:** Annual harvest of black bears in Units 19B and 19C is unknown because sealing and harvest tickets are not required. However, Units 19B and 19C have a high percentage of nonresident hunters who seal bears to transport them home. Therefore, harvest reporting is likely high. Total reported harvest in Units 19B and 19C averaged 22 bears per year during regulatory years (RY) 18 – 22 (where, RY 18= July 1, 2018 through June 30, 2019). Current black bear harvest is likely well below harvestable surplus and additional opportunity to harvest black bears in Units 19B and 19C would be sustainable.

Black bear abundance in Units 19B and 19C is unknown but the population is estimated at 1,250–1,500 black bears in Unit 19B and 975–1,165 black bears in Unit 19C based on extrapolated densities of similar habitats from other surveys. Based on our estimated sustainable harvest of 8% in Unit 19, a minimum annual harvest of 100–120 black bears can be sustained for Unit 19B and 78–93 black bears for Unit 19C.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal, and there are no biological concerns for additional harvest of black bears in Unit 19B and Unit 19C. This proposal would simplify and align regulations for black bears across Unit 19.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 104-109

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**PROPOSAL 110 - 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose seasons in Unit 20E.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would reauthorize the antlerless moose hunting seasons in Unit 20E.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 85.045(18)**

<b>Units and Bag Limits (18)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
--------------------------------------	-----------------------------------------------------------------------------	------------------------------------

...  
Unit 20(E), that portion within the Ladue River Controlled Use Area including the East Fork of the Dennison but excluding the remaining portion of the Dennison Fork of the Fortymile River and Excluding that portion within the Ladue River drainage upstream of the South Fork of the Ladue River

...

RESIDENT HUNTERS

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or

Aug. 5-Sept. 5  
Oct. 15-Nov. 30

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15-Nov. 30

...

NONRESIDENT HUNTERS

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf Unit 20(E), that portion outside of the Ladue River Controlled Use Area draining into 1) the Ladue River upstream of the South Fork of the Ladue River, 2) the Dennison Fork of the Fortymile River, and 3) the Mosquito Fork of the Fortymile River drainage.

Aug. 5-Sept.5  
Oct. 15-Nov. 30

...

RESIDENT HUNTERS

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or

Aug. 5-Sept. 5  
Oct. 15-Nov. 30

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15-Nov. 30

...

#### NONRESIDENT HUNTERS

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5-Sept.5  
Oct. 15-Nov. 30

There is a positive customary and traditional use finding for moose in Unit 20E. The Amount Reasonably Necessary for Subsistence (ANS) is 50–75 moose.

The board has identified 20E moose as an important species for consumptive uses, with a population objective of 8,000 – 10,000 moose and a harvest objective of 250 – 500.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The Alaska Department of Fish and Game (department) will have the authority to use antlerless hunts as a management tool to regulate the moose population in Unit 20E and to provide subsistence moose hunting opportunity.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The unit 20E antlerless moose hunts allow the department to moderate population growth and address habitat concerns while providing subsistence hunting opportunities pursuant to intensive management (IM) harvest objectives. Proactive maintenance of moose population size and protection of their habitat allows the state to provide sustainable access to a valuable wildlife resource while satisfying multiple use demands. In order to do so, the department regularly

monitors moose populations in 20E and employs a structured decision-making plan for the initiation of antlerless harvest.

The decision framework to initiate antlerless harvest in Unit 20E incorporates population trends, bull-to-cow ratios, and nutritional indices (e.g., twinning and browse removal rates). The moose population along the Taylor Highway has approximately doubled from an estimated size of 1,275 moose in 2005 to 2,550 moose in 2018, though population growth has stabilized since then. These abundance estimates roughly equate to 0.7 and 1.4 moose/mi<sup>2</sup>, respectively. Bull-to-cow ratios appear to be stable and above the minimum management objectives, and nutritional objectives are being met, with current twinning rates observed at 42% (2020–2022, 3-year weighted average). Browse removal rates are below the rate observed in nutritionally stressed populations. With all indices pointing towards a healthy population, the department does not plan to enact antlerless hunts during RY24 but would like to retain the hunts as a proactive management tool to rapidly respond to changes in nutrition and reduce population growth rates to maintain the current high nutritional levels.

From RY18–RY22 the annual average unit wide reported harvest was 199 moose, which is below harvest objectives. Current Unit 20E moose harvest is below IM harvest objectives. Antlerless harvest would help achieve IM harvest objectives without reducing bull-to-cow ratios below management objectives.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. As a management tool, antlerless hunts provide an additional option for population adjustment and habitat protection. Additionally, they can help achieve IM harvest objectives without reducing bull-to-cow ratios below management objectives. Without reauthorization, expedient responses to population changes may be substantially hindered. Given the current stable population trend and bull-to-cow ratios as well as healthy nutritional indices, the department does not plan to enact antlerless hunts during RY24 but would like to retain the hunts as a proactive management tool.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 111– 5 AAC 85.045 10. Hunting seasons and bag limits for moose.** Add an archery only, five-day moose season for residents and non residents in Unit 12.

**PROPOSED BY:** Alaskan Bowhunters Association

**WHAT WOULD THE PROPOSAL DO?** This proposal would add a 5-day archery-only season to the unit 12 remainder moose hunt.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 85.045(10)(A)**



Units and Bag Limits (10)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Remainder of Unit 12		
...		
RESIDENT HUNTERS		
...		
1 bull	Aug. 24-Aug. 28 Sept. 8-Sept. 17	
...		
NONRESIDENT HUNTERS		
...		
1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side		Sept. 8-Sept. 17

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

Units and Bag Limits (10)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Remainder of Unit 12		
...		
RESIDENT HUNTERS		
...		
1 bull; or	Aug. 24-Aug. 28 Sept. 8-Sept. 17	
<b><u>1 bull by bow and arrow only</u></b>	<b><u>Sept. 18-Sept.22</u></b>	
...		
NONRESIDENT HUNTERS		
...		

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side; or

Sept. 8-Sept. 17

**1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by bow and arrow only**

**Sept. 18-Sept.22**

The board has made a positive finding under Intensive Management (IM) criteria for Unit 12 moose, with an estimated population size of 4,000 –6,000 and harvest objectives for 150 – 300 annually. The board made a positive customary and traditional use finding for moose in Unit 12. The Amount Reasonably Necessary for Subsistence Uses (ANS) is 60–70 moose (5 AAC 99.025(8)).

**BACKGROUND:** Unit 12 moose IM objectives were achieved during RY15–RY19, with a unit population estimate of 6,542 (between 5,427–7,657). This midpoint estimate exceeds the upper bounds of the IM objective of 6,000, though the range of plausible population size does overlap with estimated population size. Excepting RY17, bull-to-cow ratios during RY15–RY19 exceeded management objectives of 40 bulls per 100 cows east of the Nabesna River and 25 bulls per 100 cows in the remainder of the unit. In unit 12, total reported harvest (including reported potlatch harvest) during RY15–RY19 averaged 140 before inclusion of potlatch harvest and 153 after. During RY15–RY19, an average of five moose per year were harvested using archery equipment within Unit 12. Harvest was below the IM harvest objectives of 250–450 moose per year. Achieving the IM harvest objectives may be difficult due to factors that include land ownership (e.g., federal and private lands) and associated access restrictions in Unit 12, and limited access to the remote portions of the unit. However, beginning in RY21, the IM harvest objective for Unit 12 was changed to 150–300 moose, and this objective will be much more attainable. This proposal is unlikely to increase harvest significantly, though later season hunting opportunities can confer an advantage to hunters given that bull moose are more susceptible to harvest during the rut.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of proposal. The department has no biological concerns associated with a longer season because any additional harvest is expected to be minimal due to decreased success rates associated with archery equipment. However, the department is supportive of additional harvest opportunities within Unit 12.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 112 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Limit nonresident caribou hunters to hunting in Zone 2 of RC860 until the Fortymile caribou herd is within the Intensive Management (IM) population objective.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** This proposal would limit nonresident Fortymile caribou hunters to hunting in Zone 2 under the fall registration permit hunt (RC860) only until the Fortymile caribou herd is within the IM population objective.

**WHAT ARE THE CURRENT REGULATIONS?** The current Fortymile caribou hunt structure was developed using recommendations from the 2019–2023 Fortymile Caribou Herd Harvest Plan (harvest plan) developed by public process through the Fortymile Harvest Coalition and subsequently endorsed by the Board of Game. The Fortymile caribou herd is managed on a quota system, with 75% of the annual harvest going to a fall registration hunt (RC860; August 10–September 30) and 25% to a winter (resident hunters only) registration hunt (RC867; October 27–March 31). The fall hunt quota is further divided among four geographically distinct zones. Zones 1, 3 and 4 are accessible from the Steese and Taylor Highways and the Chena Hot Springs Road, while Zone 2 is more remote, primarily accessible by airplane and boat. Nonresident hunters are allowed to hunt in the fall RC860 hunt in all zones, with a bag limit of one bull.

The Fortymile herd has an intensive management (IM) population objective of 50,000 – 100,000 and harvest objective of 1,000–15,000.

The Fortymile herd in Units 12, 20D, 20E and 25C, outside the Fairbanks Nonsubsistence Area, has a positive customary and traditional use finding, and an amount reasonably necessary for subsistence (ANS) of 350–400 caribou. Roughly half of Zone 2 is located within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Nonresident Fortymile caribou hunters would only be allowed to hunt in Zone 2 during the fall RC860 Fortymile registration hunt.

**BACKGROUND:** The Fortymile Herd recently peaked at ~84,000 caribou (July 2017), dropped below the IM population objective in 2022 (~38,000) and is currently estimated at ~34,000 (July 2023) based on mid-point population estimates.

Hunter and harvest numbers have fluctuated in recent years due to changing management strategies associated with the population decline of the Fortymile Herd during the past five years. During RY18–RY22, an average of 5,047 resident hunters (range = 2,896–8,124) and 689 nonresident hunters (range = 411–1,044) hunted in the fall Fortymile RC860 registration hunt annually. Nonresident hunters made up an average of 12% (range = 7–16%) of the total hunters during these years.

During RY18–RY22, annual harvest of the Fortymile Herd under the RC860 fall registration hunt averaged 2,617 (ranged = 795–5,538), with an average of 311 caribou (range = 208–437) harvested by nonresidents, or 12% (range = 6–26%) of the total harvest.

During RY18 and RY19, more nonresident harvest occurred annually in Zone 2 (avg.=150) than in the road accessible Zones 1, 3 and 4 combined (avg.=134). However, in RY20–RY22 more nonresident harvest occurred in Zones 1, 3 and 4 combined (avg. = 223) than in Zone 2 (avg.=106).

During RY18–RY22, total annual Fortymile caribou harvest was within the IM harvest objective (range = 1,136–7,332) and above the ANS, with a range of 928–6,990 caribou harvested annually by resident hunters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of Fortymile caribou hunting opportunity for residents and nonresidents. No conservation concerns are addressed or created by this proposal, and the department does not have conservation concerns with the current hunt management structure.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 113 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Areas closed to hunting.** Close an area within ¼ mile or 100 yards of the Steese Highway above treeline on Eagle and Twelvemile summits in Unit 20B and 25C.

**PROPOSED BY:** Sarah Behr

**WHAT WOULD THE PROPOSAL DO?** This proposal seeks to close Fortymile caribou hunting under the fall RC860 Registration Permit within ¼ mile or 100 yards of the Steese Highway above treeline on Eagle and Twelvemile summits in Units 20B and 25C.

In a written comment submitted to the Board of Game (board), the proponent has clarified that the proposal was intended to apply only to caribou. Hunting for all other game species would be unaffected by this proposal.

**WHAT ARE THE CURRENT REGULATIONS?** Under the fall Fortymile Caribou Registration Hunt (RC860), hunters along the Steese Highway (Zone 1) are allowed to hunt caribou on public land immediately off the road surface along the entire length of the Highway when the season is open. However, hunters are not allowed to shoot on, from, or across the highway. When large numbers of Fortymile caribou cross these roads, the department has the authority to close portions of the hunt area by emergency order to prevent overharvest.

The department utilizes the discretionary permit authority regulation to implement a no-hunt area in under the same permit (RC860) but in a different part of the range (20E). At the direction of the board in 2017, the department established a no-caribou-hunting area at the direction of the board. The was done in the portion of Unit 20E within a corridor extending 100 feet from each side of the Taylor Highway, including the drivable surface of the road, between mileposts 75.3

and 117.2 and along the entire length of the Top of the World Highway. The corridor was established to address safety concerns and reduce wounding loss from hunters shooting at caribou adjacent to and parallel to these roads in this area.

The Fortymile herd has an intensive management (IM) population objective of 50,000 – 100,000 and a harvest objective of 1,000–15,000.

The Fortymile herd in Units 12, 20D, 20E and 25C, outside the Fairbanks Nonsubsistence Area, has a positive customary and traditional use finding and an amount reasonably necessary for subsistence uses of 350–400 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Fortymile caribou hunters participating in the RC860 fall caribou registration hunt would not be allowed to hunt caribou within ¼ mile or 100 yards of the Steese Highway above treeline on Eagle and Twelvemile summits.

Adoption of the proposal would also result in a reduction of Fortymile herd caribou hunting opportunity in portions of Unit 25C.

**BACKGROUND:** Harvest management of the Fortymile Herd is guided by the 2019–2023 Fortymile Caribou Herd Harvest Plan (harvest plan) that was developed by the Fortymile Harvest Management Coalition (HMC) consisting of members of the Anchorage, Central, Delta, Eagle, Fairbanks, Matanuska Valley, and Upper Tanana/Fortymile Fish and Game Advisory Committees, and the Eastern Interior Regional (Federal) Subsistence Advisory Council in cooperation with the Yukon Fish and Wildlife Management Board, Yukon Department of Environment, Yukon First Nations, Bureau of Land Management, and the Alaska Department of Fish and Game. The Alaska delegates of the coalition developed the Management provisions specific to Alaska by and Yukon delegates abstained from Alaska hunt management decisions.

The HMC recommended the following options for managing situations where large numbers of caribou congregated near or traveled across roads (including the Steese Highway):

- Temporary closures in road corridors or specific drainages.
- Use of targeted hunts to provide additional hunting opportunity if necessary to help meet winter harvest quotas.

The department has been successful using such delayed hunt openings and hunt closures to maintain harvest within, or close to, the annual quota as outlined in the harvest plan. The HMC did not include recommendations in the harvest plan to address specific hunter crowding, hunt quality, or safety issues such as those outlined by the author of this proposal.

In recent decades, department staff have witnessed hunter activities identified by the proponent, including:

- Hunters driving ATVs on highways.
- Hunters shooting at caribou from the edge of the highway.
- Hunters shooting parallel to roads at caribou in the direction of camps along the road.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it seeks to address allocation, safety, and hunt quality issues. The department has successfully used delayed hunt openings and hunt closures to maintain harvest within, or close to, the annual quota as outlined in the harvest plan and the department does not have any conservation concerns with the current Fortymile caribou hunt management structure. This proposal could address some of the safety issues associated with this hunt that were identified by the proposer and have been witnessed by department staff in recent decades.

If the board intends to adopt this proposal, the department recommends amending it to clarify the area is only closed to the take of caribou, not all species as well as identify mile markers demarcating where treeline starts and ends to minimize enforcement challenges.

If adopted, the department can use discretionary permit authority (5 AAC 92.052 (7)) to close the specified area under RC860 permit hunt conditions.

Because the proposed closed area would be a permanent part of the hunt area, this proposal would result in a reduction of Fortymile herd caribou hunting opportunity in portions of Unit 25C; therefore, the board may wish to consider whether implementing the restrictions outlined in this proposal would continue to provide reasonable opportunity for subsistence uses.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 114 – 5 AAC 92.011. Taking of game by proxy.** Allow proxy hunting for caribou in Units 20B, 20D, 20E, 20F, and 25C registration hunts.

**PROPOSED BY:** Roy Flemmer

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow proxy hunting for Fortymile caribou under registration hunts RC860 and RC867.

**WHAT ARE THE CURRENT REGULATIONS?** Resident hunters holding a valid resident hunting license may hunt as a proxy to take specified game for another resident (beneficiary) who is blind, physically or developmentally disabled, or 65 years of age or older, as authorized by 16.05.405 and 5 AAC 92.011(a-k). Antler destruction is also required in proxy hunts and consists of removing at least one antler from the skull plate, or cutting the skull plate in half to destroy the trophy value. It is required for all species, and is required for each animal taken by the proxy hunter (both the proxy and the beneficiary’s animals), and must occur at the kill site.

Proxy hunting in Units 20B, 20D, 20E, 20F and 25C for caribou under the Fortymile registration hunts RC860 and RC867 is prohibited in 5 AAC 92.011(1)(1).

The Fortymile herd has an intensive management (IM) population objective of 50,000 – 100,000 and harvest objective of 1,000–15,000.

The Fortymile herd in Units 12, 20D, 20E and 25C, outside the Fairbanks Nonsubsistence Area, has a positive customary and traditional use finding, and an amount reasonably necessary for subsistence of 350–400 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Proxy hunting for caribou under the Fortymile registration hunts RC860 and RC867 would be allowed.

**BACKGROUND:** The Board of Game first adopted regulations prohibiting proxy hunting for Fortymile caribou under registration hunts RC860 and RC867 (in Unit 20E only), during their March 2006 Interior Region meeting (proposal 161; RC110). The board adopted this regulation because proxy hunting would allow circumvention of harvest restrictions specified by the board for these registration hunts.

The board expanded the proxy hunting prohibition for Fortymile caribou under these registration hunts to include Units 20B, 20D, 20E, 20F and 25C at their 2012 Interior Region meeting based on recommendations in the publicly developed 2012–2018 Fortymile Herd Caribou Harvest Plan (harvest plan). This harvest plan was developed by the Fortymile Harvest Management Coalition, consisting of members of the Anchorage, Central, Delta, Eagle, Fairbanks, Matanuska Valley, and Upper Tanana–Fortymile advisory committees, and the Eastern Interior Regional Subsistence Advisory Council in cooperation with Yukon Fish and Wildlife Management Board, Yukon Department of Environment, Yukon First Nations, Bureau of Land Management, and the Alaska Department of Fish and Game. Management provisions specific to Alaska were developed by the Alaska delegates of the coalition. Yukon delegates abstained from Alaska hunt management decisions. The board endorsed the 2012–2018 harvest plan during their 2012 Interior Region meeting to help guide harvest management of the Fortymile herd, and the recommendation to prohibit proxy hunting was retained in the current 2019–2023 harvest plan which can be found here

[http://www.adfg.alaska.gov/static/research/plans/pdfs/fortymile\\_harvest\\_plan\\_2019\\_2023.pdf](http://www.adfg.alaska.gov/static/research/plans/pdfs/fortymile_harvest_plan_2019_2023.pdf).

The Fortymile Herd recently peaked at ~84,000 caribou (July 2017), dropped below the IM population objective by 2022 (~38,000) and is currently estimated at ~34,000 (July 2023) based on mid-point population estimates.

Hunter and harvest numbers have fluctuated in recent years due to changing management strategies associated with the population decline of the Fortymile Herd during the past five years. During RY18–RY22, an average of 5,047 resident hunters (range = 2,896–8,124) hunted in the fall Fortymile RC860 registration hunt annually and an average of 2,149 resident hunters (range = 1,246–3,005) hunted in the winter Fortymile registration hunt RC867 during RY18 and RY20–RY22. No state winter season took place in RY19.

During RY18–RY22, annual harvest of Fortymile caribou by residents under the RC860 fall registration hunt averaged 2,306 (ranged = 587–5,196) and averaged 1,003 (ranged = 341–1,970) under the winter RC867 hunt during RY18 and RY20–RY22.

During RY18–RY22, total annual Fortymile caribou harvest was within the IM harvest objective (range = 1,127–7,361) and above the amount necessary for subsistence, with a range of 919–7,021 caribou harvested annually by resident hunters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. No conservation concerns are addressed or created by this proposal, and the department does not have conservation concerns with the current hunt management structure.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 115 – 5 AAC 92.220 Salvage of game meat, furs and hides.** Require successful Fortymile caribou hunters to gut animals in the field.

**PROPOSED BY:** Sarah Behr

**WHAT WOULD THE PROPOSAL DO?** The proponent asks for a requirement to have Fortymile caribou hunters remove viscera from harvested animals “in the field.” In addition, the proponent references a recommendation in the Fortymile Caribou Harvest Plan to require hunters to remove viscera from the drivable surface of roadways. This proposal would presumably establish a requirement for Fortymile caribou hunters to dispose of parts of game not required to be salvaged off the drivable surface of roadways in a manner as directed by the board, which is slightly different than the existing definition of “field.”

Since submitting the proposal, the proponent also clarified the proposal is intended to apply to all Fortymile caribou hunts, which are RC860, RC867, YC831, and AC999. The proponent also clarified “in the field” to mean “at the kill site,” and the intended definition of “gut” to mean “dispose of the viscera.” The existing common definition of “viscera” is the internal organs and is also commonly referred to as the guts.

**WHAT ARE THE CURRENT REGULATIONS?** Currently there are no requirements for any of the Fortymile caribou permit hunts (YC831, RC860, RC867, AC999) that require hunters to dispose of parts of game not required to be salvaged (including viscera), in any particular manner. Such a requirement would be implemented through department discretionary permit hunt conditions.

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.** (24) a permittee must dispose of parts of game not required to be salvaged as directed by the department in the permit

Salvage requirements for all Fortymile caribou hunts include:



**5 AAC 92.220. Salvage of game meat, furs and hides.** (d) A person taking game not listed in (a) of this section shall salvage for human consumption all edible meat, as defined in 5 AAC 92.990.

**5 AAC 92.990. Definitions.**

(a) In addition to the definitions in AS 16.05.940, in 5 AAC 84 - 5 AAC 92, unless the context requires otherwise,

...

(26) “edible meat” means, in the case of a big game animal, except bear, the meat of the ribs, neck, brisket, front quarters, hindquarters, and the meat along the backbone between the front and hind quarters;...however, “edible meats” of big game...does not include meat of the head, meat that has been damaged and made inedible by method of taking, bones, sinew, incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera;

(28) "field" has the meaning given in AS 08.54.790;

AS 08.54.790. Definitions.

(7) “field” means an area outside of established year-round dwellings, businesses, or other developments associated with a city, town, or village; “field” does not include permanent hotels or roadhouses on the state road system or state or federally maintained airports;

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Fortymile caribou hunters would be required to dispose of the viscera of harvested caribou at the kill site.

**BACKGROUND:** The current Fortymile caribou hunt structure was developed using recommendations from the 2019–2023 Fortymile Caribou Herd Harvest Plan (harvest plan) developed through public process. There is a recommendation in the plan to “add a provision to the hunt conditions that hunters must remove all viscera from drivable surface” of the roadways. Currently there are no requirements for any of the Fortymile caribou permit hunts (YC831, RC860, RC867, AC999) that require hunters to dispose of parts of game (including viscera) not required to be salvaged in any particular manner. However, a requirement could be added to Fortymile permit hunts under the department’s discretionary permit hunt authority.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. No conservation concerns are addressed or created by this proposal, and the department does not have conservation concerns with the current hunt management structure.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 116 – 5 AAC 96.126. Non-Intensive Management Predator Control Plans.** Implement a non-intensive management predator control plan within the Tok Management Area to benefit Dall sheep.

**PROPOSED BY:** Upper Tanana/Fortymile Fish & Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Establish a non-intensive management (non-IM) predator control plan within the Tok Management Area (TMA) via aerial coyote and wolf control with rotary wing aircraft (helicopter) retrieval of carcasses for the benefit of local sheep populations.

**WHAT ARE THE CURRENT REGULATIONS?**

**Sec. 16.05.783. Same day airborne hunting.** (a) a person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne. However, the Board of Game may authorize a predator control program that allows airborne or same day airborne shooting...

**5 AAC 92.039. Permit for taking wolves using aircraft.** (a) a person may not use an aircraft to land and shoot a wolf without first obtaining a permit from the department. (b) a person may not use an aircraft to take a wolf by aerial shooting without first obtaining a permit from the department. (c) a person may not use a helicopter for helicopter trapping of wolves without first obtaining a permit from the department. ...

**5 AAC 92.126. Non-Intensive Management Predator Control Plans...**(a) Non-intensive management plans are established under this section in areas described in this section.

Dall sheep have not been identified as meeting the criteria necessary for warranting intensive management of a big game prey population. The Board of Game (board) has made a negative finding for customary and traditional use of TMA sheep (5 AAC 99.025(a)(10)). Non-IM predator control plans are found in 5 AAC 92.126 and there are currently no active programs.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would create a non-IM plan for predator control within the TMA. If adopted, coyotes and wolves would be allowed to be removed using aerial methods under the conditions of a permit authorized by ADF&G. Effects on the increased survival of Dall sheep population are unknown. The portion of coyote and wolf populations to be removed to improve sheep survival sufficiently for population growth is also unknown.

Department staff would conduct a feasibility assessment and identify data needed to evaluate the effects of predation on population dynamics of this Dall sheep population and design effective treatments and monitoring strategies for prey responses. The department would define population and geographic parameters of control consistent with population and harvest objectives for sheep within the TMA and supported by survey data and reports. The department would present a biological rationale for the mechanisms of predator control and their effects relative to the TMA sheep population including an explanation of how control objectives would inform management objectives for TMA sheep. The assessment would also present existing population and harvest objectives for wolves and coyotes and describe the proposed management strategy and evaluate deliverable measures of progress to determine if additional data collection is necessary. The assessment may also consider non-treatment comparison sites and other methods of reducing predation, such as ground-based trapping or snaring by department staff. Implementation costs would be estimated consistent with feasibility assessment guidelines. Parameters informing the success of a program (and need for the assessment) include population increase necessary to reach population objectives, increased average annual harvest required to reach harvest objectives, potential to mitigate biological limitations and reduce hunting conflicts, anticipated public participation, data availability for designing a management plan, potential to demonstrate progress within a defined

period of time, and potential to document reasons for outcomes in population recovery. Population and harvest objectives (as well as potential for successful implementation of predator control) would be informed by alternatives to predator control and variables beyond the control of the department, including but not limited to land ownership, effects of habitat and environment on population dynamics, and additional factors considered important by the board. Given that TMA sheep are not an intensively managed species, some IM-specific aspects of feasibility assessment guidelines would not be required (e.g., positive subsistence findings).

**BACKGROUND:** The TMA is designed to provide for trophy sheep hunting opportunities. Between regulatory years (RY) 19 and 23 the sheep population in the TMA decreased by 73%, with a corresponding 75% reduction in legal rams. Within this period, average hunter success rates dropped as did average age and horn size of sealed sheep. In response to the decline, the allowable harvest was reduced for the RY21 season onward. Also, the hunt structure was altered from two hunt periods prior to RY22 to a single period from RY22 onward; the number of offered permits dropped from 100 in RY19 and RY20 to 60 in RY21 and to 10 in RY22-RY23.

The wolf population size within the TMA was at or above the minimum objective for population size (100 animals) and healthy at the time of the department's most recent surveys (conducted in 2008-2009). Since 2019, 10 wolves out of the 139 sealed for unit 12 were from the TMA. The department does not monitor coyote populations or require sealing. Trapper survey data indicate that coyote harvest was modest in region III in 2021 (minimum of 47) and based on that the department assumes a similarly modest take, applies in the TMA. Canid dynamics in the TMA are unknown.

Past research indicates that wolves and coyotes may occasionally be a significant mortality source in sheep population outcomes; however, the role or significance of predation on sheep population trends within the TMA is not established.

Within the Central Alaska range during 1995–1996, coyotes were identified as a significant predator of lambs and accounted for 34% of total mortality observed for collared lambs during those seasons. Though anecdotal evidence of overlap in habitat between sheep and coyotes exists, the department did not conduct formal inquiries into the ecological niches occupied by coyotes. Additionally, research in Kluane Park (Canada) found increased coyote predation on sheep during winters with high snowfall.

Tanana Flats wolf control in the mid 1970s resulted in immediate reversals in a declining sheep population, though to a smaller degree than observed in moose and caribou populations. Selective predation on young animals was not observed and survival of yearlings unexpectedly decreased following wolf control. Only 2% of wolves killed contained sheep tissue within their digestive systems, indicating that sheep were not a regular prey species for Tanana Flats wolf packs. Recovery of lamb production was hypothesized to be the likely result of mild winters rather than control actions.

In a separate example, following nonlethal wolf control in the Goodpaster drainage/Mt Harper/Glacier Mountain vicinity (1997-2001), the department did not observe any significant changes in sheep populations, accompanied by a non-significant trend of declining numbers due to fewer legal rams. Lamb numbers during this period remained consistent, possibly indicating that harvest rather than wolf control was having a larger impact on the population. Several other projects found mixed results regarding wolf predation. In the Central Alaska Range (1999-2005), 83% of total ewe mortality was caused by wolves (though ewe survival was generally high) and 5% of total lamb mortality was caused by wolves with lamb survival at 32%. In the Eastern Brooks Range (2009-2012), wolves caused 80% of total ewe mortality (though ewe survival was generally high) and 8% of total lamb mortality with lamb survival at 48%. In the Chugach mountains (2009-2014), wolves caused only 5% of total ewe mortality (85% of mortalities

were the result of accidents, disease, age, and nutritional deficits) and 2% of total lamb mortality. Lamb survival was 27%.

Without an intensive management designation for Dall sheep, predator control is not normally employed as a means for addressing depletions of a prey species below a population size capable of sustaining harvest objectives. Control of predation by wolves generally falls within the purview of IM and having objectives of a wolf population reduction. The closest IM predator control program to the TMA occurred within the Upper Yukon-Tanana Predation Control Program. This program was active for lethal aerial control during RY04-RY17 and is currently suspended in the IM area. At present, standard hunting and trapping regulations prohibit the shooting of a wolf until after 3am following the day in which a flight occurred (unless legally caught in a trap or snare). The take of wolves same day airborne (SDA) may be implemented by the commissioner as part of a control program, and those control methods are independent of hunting and trapping regulations. Standard trapping season dates for coyotes in units 12 and 20E run from October 15 through April 30 with no limit. For the remainder of unit 20, season dates fall from November 1 through March 31. For hunting, there is no closed season and no bag limit in units 12 and 20. Coyotes may be shot SDA provided that the shooter is at least 300ft from an airplane.

There is no precedent for non-IM wolf or coyote control and no precedent for IM coyote control in the State of Alaska. However, the board has authorized the state to implement one non-intensive management predator control program to assist in the recovery of the muskoxen population within 26(B). The muskoxen present are not intensively managed for high levels of human harvest but do constitute a source of hunting opportunity. Predation by brown bears was identified as the primary source of mortality in muskoxen and is a substantive factor in the failure to achieve population and harvest management objectives; given that there are no positive IM findings for muskoxen, no additional IM objectives exist. Reduced predation by brown bears was identified as a reasonable tool to meet management objectives due to the high prevalence of state land within the proposed management area with little ranging of muskoxen onto federal lands. For the purposes of the muskoxen program, the board authorized aerial, land and shoot, and ground based lethal removal of brown bears by department employees or agents of the state accompanied by department employees. The lethal brown bear reduction was conducted by department staff.

The TMA is majorly comprised of sheep habitat (1,250 mi<sup>2</sup> out of 1,800 mi<sup>2</sup> at or above 4,000 feet elevation) with elevations ranging from 1,600 feet to above 8,000 feet. Tree lines typically occur at 3,000-4,000 feet. The terrain is mountainous with boreal, subalpine, and alpine communities represented throughout the management area. State land makes up much of the land area within the TMA and is dominated by dense tree cover and mountainous terrain not well suited for aerial wolf control. This would reduce the likelihood of successfully reducing wolves within the TMA using aerial methods.

The department has ongoing research projects to assess sheep populations in places where sheep have been found to provide for customary and traditional uses. Some of the research being collected includes mortality information.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. Extant wolf and coyote seasons and bag limits are relatively liberal within the TMA. Currently, the harvest of fur is poorly incentivized with high fuel prices and low fur values limiting public involvement in standard harvest practices. The additional effort required to obtain a permit for predator control may constitute another barrier to public participation and would likely yield little additional harvest. Terrain and land ownership patterns are not well suited for aerial control both in terms of harvest and retrieval. Additionally, personnel and operational funding may be limited for additional department control efforts where department staff are

involved. The impacts of wolf and coyote predation on sheep populations may be substantive; however, no contemporary information is available for their influence on sheep populations within the TMA. The department would need board guidance on sheep population and harvest objectives in the TMA or other criteria as metrics of non-IM program achievement. The department recommends the board allow time for the conclusion of the existing sheep research projects to allow for an informed conversation regarding sheep populations. The additional time needed to conclude the research projects and analyze the data will provide the department with the ability to assess if non-intensive management such as the one proposed could have a measurable effect on the population.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs to the department.

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Proposals 117-123

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**PROPOSAL 124 – 5 AAC 84.270 Furbearer trapping seasons and bag limits.**

**PROPOSED BY:** Eagle Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This would extend the marten season by 2 weeks to end on March 15 in Units 20E and 25B.

**WHAT ARE THE CURRENT REGULATIONS?** The current marten regulations for Unit Units 20E and 25B can be found in 5 AAC 84.270, and in the *2022–2023 Alaska Trapping Regulations*.

- Season dates are Nov. 1–Feb. 28.
- No bag limit.
- There is no sealing or reporting requirement for marten.

There is a positive customary and traditional use finding for all furbearers and fur animals in all units with a harvestable portion, including marten (5 AAC 99.025(a)(13)(F)). The Board of Game has determined that the amount reasonably necessary for subsistence uses is 90% of the harvestable portion of the population. Marten populations in GMUs 20E and 25B are outside of nonsubsistence areas.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposal will likely lead to an increase in marten harvest.

**BACKGROUND:** Marten are a valuable furbearer species that contribute to trapping activities in Alaska. According to the 2021 Alaska Trapper Questionnaire, it is ranked as the second most important trapping species in Region III. Seasonal timing of harvest traditionally aligns with significant snowfall and freeze-up which increases access by snowmachine and dog team.

Fluctuations in harvest and trappers may be linked to low fur prices, high gas prices, and other factors unrelated to marten abundance. The department does not have abundance estimates of marten in Region III; however, trappers who responded to the Trapper Questionnaire for Region III indicate fluctuations in abundance transitioning from “common” occurrence during 2018-2019 to “scarce” during 2020-2021.

Extending the trapping season may impact breeding individuals and expose more juveniles to trapping pressures which could affecting recruitment rates. Additionally, pelt quality is diminished later in the trapping season.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it does not create a biological concern. Trapping pressure is currently low due to low fur prices; however, if fur prices rebound, effort and take could increase substantially with a longer season. This proposal would also place marten out of alignment with mink and weasel seasons which may lead to enforcement issues.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 125 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Require a registration permit to hunt moose instead of general season harvest ticket for all general season, harvest ticket moose hunts in Game Management Unit 20D.**

**PROPOSED BY:** Delta Junction Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would require moose hunters in Unit 20D to get a registration permit instead of a general season harvest ticket.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 20(D), that portion lying south of the north bank of the Tanana River and east of the west bank of the Johnson River, except that portion within the Robertson River drainage south of the confluence of the east and west forks, and within one mile west of the west fork.

**RESIDENT HUNTERS:**

1 bull; September 1–15

**NONRESIDENT HUNTERS:**

No open season

Unit 20(D), that portion within the Robertson River drainage south of the confluence of the east and west forks, and within one mile west of the west fork.

RESIDENT HUNTERS:

1 bull; September 1–15

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side; September 5–15

Unit 20(D), that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River, except the Delta Junction Management Area and the Bison Range Youth Hunt Management Area (General hunt only).

RESIDENT HUNTERS:

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side;  
September 1 – 15

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side; September 5–15

Unit 20(D), that portion within the Healy River drainage.

RESIDENT HUNTERS:

1 spike-fork bull; August 15–28

or;

1 bull; Sept 1–20

NONRESIDENT HUNTERS:

1 bull; September 1–20

Unit 20(D), that portion lying north of the north bank of the Tanana River and draining into the Volkmar River east to include the Billy Creek drainage, excluding that portion within the Healy River drainage.

RESIDENT HUNTERS:

1 bull; September 1–20

NONRESIDENT HUNTERS:

1 bull; September 1–20

Remainder of Unit 20(D)

RESIDENT HUNTERS:

1 bull; September 1–20

NONRESIDENT HUNTERS:

1 bull; September 1–20

There is a positive customary and traditional use determination for moose in Unit 20D outside of the Fairbanks Nonsubsistence Area. The amount necessary for subsistence uses (ANS) is 15 moose for that portion north of the Tanana River and 5 moose for that portion south of the Tanana River (5 AAC 99.025 (8)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Requiring hunters to obtain a registration permit instead of a harvest ticket would greatly improve reporting and provide the department with more accurate harvest and effort data in a timely manner. The use of a registration permit subjects hunters who do not report to both monetary and loss of hunting privilege consequences.

**BACKGROUND:** The Delta Junction area (Unit 20D) is highly accessible and has some of the highest hunter effort for its size in the state. During 2018–2022 an average of 832 hunters hunted annually and had a cumulative harvest of 984 moose or 196 annually in the general season hunts within unit 20D. The Unit 20D moose population is a designated Intensive Management population and is managed for high levels of harvest. A high percentage of the hunter effort and harvest occurs in the southwestern part of the unit. This portion of the unit is managed using antler restrictions and has a long history of antlerless harvest. Timely and accurate reporting data would further help the department manage this area for maximum hunting opportunity and sustained harvest.



**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal. More accurate and timely harvest and hunter effort data will improve the department's ability to maximize harvest opportunity and meet intensive management objectives. Hunters will be able to obtain these permits in person at ADF&G offices or online. If adopted, the department plans to follow standard reporting requirements which require successful hunters to report within 15 days of taking the bag limit, and for unsuccessful hunters and those that did not hunt to report within 15 days after the close of the season. The move to a registration permit represents a reduction to subsistence opportunity; if the board adopts this proposal it may wish to consider if reasonable opportunity for subsistence uses is still provided.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

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**PROPOSAL 126– 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose hunting season in Unit 20D.

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

**WHAT WOULD THE PROPOSAL DO?** Reauthorize antlerless moose hunting seasons in Unit 20D.

**WHAT ARE THE CURRENT REGULATIONS?** Unit 20D currently has antlerless hunts available by drawing permit only, with fewer than 50 permits offered. Current antlerless moose seasons in Unit 20D are as follows:

- Bison Range Youth Moose Hunt (YM792): youth (ages 10 to 17) hunters that are residents or nonresident children of residents; one bull per lifetime with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side, or one antlerless moose; however, a calf or cow accompanied by a calf may not be taken; September 1–30.
- Disabled Veteran/Purple Heart Recipient Hunt (DM795): qualified Purple Heart Recipient and 100% service-connected disability, resident and nonresident hunters; one moose every 4 years; however, a calf or cow accompanied by a calf may not be taken; September 1–15 within the Delta Junction Management Area
- Southwestern Unit 20D drawing hunt (DM791) excluding the Delta Junction Management Area; resident hunters; one antlerless moose; however, a calf or cow accompanied by a calf may not be taken; October 10–16.

All antlerless hunts listed above occur in the Fairbanks Nonsubsistence Area (FNA). Additional antlerless hunts within 20D outside the FNA are not sustainable. In addition to these drawing hunts, registration hunts are retained in the codified regulation for the department to use in reducing or stabilizing the moose population in some areas of southern Unit 20D by increasing antlerless harvest. These hunts have not occurred since 2009.

Hunts for bull moose are also available in Unit 20D. Refer to the *2023–2024 Alaska Hunting Regulations* for specific details about moose hunting seasons in this area.

Moose in that portion of Unit 20D north of the Tanana River and outside the boundaries of the Fairbanks Nonsubsistence Area have a positive customary and traditional use (C&T) finding and an amount reasonably necessary for subsistence uses (ANS) of 5–15. Moose in that portion of 20D south of the Tanana River and outside of the boundaries of the FNA also have a positive C&T finding and an ANS of 5.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal will allow antlerless hunts to continue to be available to hunters and to the department for use as a tool to regulate the moose population. Antlerless hunts are an important tool for population regulation and can mitigate the potential for sharp population declines by reducing range degradation.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The goals of Unit 20D antlerless hunts are to make progress toward achieving the Board of Game’s (BOG) intensive management (IM) harvest objective by harvesting cow moose from this highly accessible population and to address concerns about range degradation, declines in nutritional indices, and reduced reproductive success by slowing moose population growth. It is important to manage this population for stability and a consistent harvestable surplus, rather than allow large population expansions and contractions, which can cause wide swings in the number of cow moose available for harvest.

These antlerless moose hunts are intended to improve or maintain moose habitat quality to support the current moose population. When appropriate, additional cow harvest could contribute to meeting Intensive Management (IM) harvest objectives. Moose populations will benefit by maintaining moose densities that are compatible with the carrying capacity of the habitat. Delta Junction residents and motorists may benefit from reduced moose–vehicle collisions and moose–human conflicts.

To maintain productive moose in adequate nutritional condition, department research indicates that 10-month-old calves should weigh at least 385 pounds and the population should not be allowed to grow when the 2-year average twinning rate is 11–20%. In 2019, 10-month-old calf weights in Unit 20D remained under 385 pounds (20D avg weight = 368 pounds). The Unit 20D 2-year twinning rate of 11% is also an indication this population is showing signs of nutritional stress. The department will continue to monitor these biological metrics as well as other density-dependent indices of nutritional condition. However, after an approximate 40% reduction of the southern Unit 20D moose population due to the severity of the 2021–2022 winter, the department expects gradual improvements in nutritional status. The need for antlerless harvest will be significantly less than in recent years while the department manages for stability at the current, reduced, density.

The department will issue antlerless moose permits as needed to maintain a stable moose population with the goal of improving moose nutritional condition in Unit 20D. We anticipate

issuing fewer than 20 drawing permits for antlerless moose in regulatory year (RY) 24. During RY17–RY20 we issued an average of 30 drawing permits in Unit 20D where the bag limit included antlerless moose and resulted in an average harvest of 19 females (7% of the total 20D harvest). In RY21 we issued 46 drawing permits in Unit 20D which included antlerless moose as part of the bag limit and hunters harvested 28 females. The department canceled all antlerless hunts for RY22 as a result of the 2021–2022 winter and awarded no antlerless permits for RY23. The department does plan to issue a limited number of antlerless permits for RY24. The department will only issue registration permits in specific areas if additional harvest is necessary to maintain optimal moose densities.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with harvest of antlerless moose taken under these regulations in these hunt areas. However, there are biological concerns regarding habitat degradation, reduced nutritional condition, and reduced reproductive success if antlerless hunts are eliminated and the population is allowed to grow. The Unit 20D moose population has potential for growth due to extensive agricultural lands, wildland fire footprints, and high predator harvest. If antlerless moose hunts are not reauthorized, the moose population may quickly exceed carrying capacity. These hunts maintain the opportunity to hunt a harvestable surplus of cow moose and help to meet IM harvest objectives.

There are three other proposals the BOG will address during the 2024 interior BOG meeting that request changes in the Unit 20D antlerless moose hunt structure. The department requests the BOG prioritize allocation among user groups and antlerless hunts to provide the department guidance if harvestable surplus of antlerless moose is not adequate to conduct all hunts during the same year. This could be accomplished either through this proposal or one of the other three proposals the board will consider.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

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Proposal 127

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**PROPOSAL 128 – 5 AAC 85.045 Hunting seasons and bag limits for moose.** Change the bag limit to the YM792 youth moose hunt.

**PROPOSED BY:** Lucas Wacker

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the bag limit to one bull moose per lifetime for the bison range YM792 hunt. The proponent also suggests allowing motorized access into the Bison Range Controlled Use Area when the antlerless portion is removed from the legal bag limit for this hunt.

**WHAT ARE THE CURRENT REGULATIONS?**

## **Unit 20(D), that portion within the Bison Range Controlled Use Area (YM792)**

### **RESIDENT AND NONRESIDENT HUNTERS:**

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf; September 1–30 (each hunter is assigned a four day hunt period during these dates based on the order drawn);

- Each permittee must be accompanied in the field by a licensed Alaska resident adult at least 21 years old. The nonresident youth's accompanying resident adult must be a parent, stepparent, or legal guardian. Bag limit counts against the bag limit of BOTH the youth permittee and the accompanying adult.
- The area is open to moose hunting by permit only and is closed to motorized vehicles for hunting July 1–September 30, including the transportation of hunters, their hunting gear, and/or parts of game in the controlled use area.

There is a positive customary and traditional use determination for moose in Unit 20D outside of the Fairbanks Nonsubsistence Area. The amount reasonably necessary for subsistence uses (ANS) is 15 moose for that portion north of the Tanana River and 5 moose for that portion south of the Tanana River (5 AAC 99.025(8)). However, the area this proposal seeks to make changes to is entirely within the Fairbanks Nonsubsistence area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would change the youth moose hunt (YM792) bag limit to one bull moose per lifetime in years the antlerless portion of the hunt is cancelled. It would also allow the use of motorized vehicles to be used for this hunt in years the antlerless portion of the bag limit is removed.

**BACKGROUND:** The youth moose hunt YM792 and associated motorized restrictions were created in 2002 to keep traffic disturbance to a minimum on the Delta Junction Bison Range to reduce the impact of moose hunting on bison management. The bag limit has changed over time from any bull to bull with antler restrictions, and since 2006 it has been bull with spike/fork, or 50-inch antlers, or antlers with at least 4 brow tines on one side or cow (not accompanied by calf) until the antlerless portion of the hunt was cancelled in 2022. This cancellation along with the other Unit 20D antlerless hunts were cancelled due to the severe 2021–2022 winter that resulted in an approximate 40% decline in the moose population, in part due to moose that were in poor nutritional condition in southwestern Unit 20D.

There have been 10 permits issued annually since 2006 and the average harvest has been 1 bull and 7 cows (no cow bag limit in RY 2022) with an average overall success rate of 75%. Since 2006, at least 70% of the harvest for this hunt has been antlerless and the overall success rate dropped to just 30% in RY22 when the antlerless portion of the hunt was cancelled due to winter mortality. This resulted in many complaints from hunters about the restrictive nature of the YM792 hunt.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal, however, recommends an any moose bag limit (except a calf or a cow accompanied by a calf). The department **OPPOSES** the use of motorized vehicles for this hunt so that the impact of moose hunting on bison management is kept to a minimum and the herd isn't prematurely displaced off the Delta Junction Bison Herd range onto the neighboring Delta Agricultural project. This will also ensure less competitive walk-in hunting opportunities continue for moose hunters and hunters seeking small game.

The department also requests clarification from the board on allocative priority for the various antlerless hunts in regulation for Unit 20D in the event there is not adequate harvestable surplus to conduct all hunts during the same year.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 129 – 5 AAC 85.045 Hunting seasons and bag limits for moose.** Change the bag limit to the YM792 youth moose hunt.

**PROPOSED BY:** Kenneth Bowman

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the bag limit to one moose (except a calf or a cow accompanied by a calf) per lifetime for the bison range YM792 hunt, or at minimum change the legal animal to any bull.

**WHAT ARE THE CURRENT REGULATIONS?**

**Unit 20(D), that portion within the Bison Range Controlled Use Area (YM792)**

RESIDENT AND NONRESIDENT HUNTERS:

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf; September 1–30 (each hunter is assigned a four day hunt period during these dates based on the order drawn);

- Each permittee must be accompanied in the field by a licensed Alaska resident adult at least 21 years old. The nonresident youth's accompanying resident adult must be a parent, stepparent, or legal guardian. Bag limit counts against the bag limit of BOTH the youth permittee and the accompanying adult.
- The area is open to moose hunting by permit only and is closed to motorized vehicles for hunting July 1–September 30, including the transportation of hunters, their hunting gear, and/or parts of game in the controlled use area.

There is a positive customary and traditional use determination for moose in Unit 20D outside of the Fairbanks Nonsubsistence Area. The amount reasonably necessary for subsistence uses (ANS) is 15 for that portion north of the Tanana River and 5 for that portion south of the Tanana River. However, the area this proposal seeks to make changes to is entirely within the Fairbanks Nonsubsistence area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would change the youth moose hunt (YM792) bag limit to 1 moose (except a calf or a cow accompanied by a calf) per lifetime of a hunter, or 1 bull per lifetime of the hunter. This regulation change would greatly improve the success rate of this youth hunt particularly in years when antlerless hunts aren't offered.

**BACKGROUND:** The youth moose hunt YM792 and associated motorized restrictions were created in 2002 to keep traffic to a minimum on the Delta Junction Bison Range to reduce the impact of moose hunting on bison management. The bag limit has changed over time from any bull to bull with antler restrictions, and since 2006 it has been bull with spike/fork, or 50-inch antlers, or antlers with at least 4 brow tines on one side or cow (not accompanied by calf) until the antlerless portion of the hunt was cancelled in 2022. This cancellation along with the other Unit 20D antlerless hunts were cancelled due to the severe 2021–2022 winter that resulted in a 40% decline in the moose population, in part due to moose that were in poor nutritional condition in southwestern Unit 20D.

There have been 10 permits issued annually since 2006 and the average harvest since 2006 has been 1 bull and 7 cows (no cow bag limit in RY 2022) with an average overall success rate of 75%. Since 2006, at least 70% of the harvest for this hunt has been antlerless, and the overall success rate dropped to just 30% in RY22 when the antlerless portion of the hunt was cancelled due to winter mortality. This resulted in many complaints about the restrictive nature of the YM792 hunt.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal and has no biological concerns, but if action is taken on the YM792 hunt through proposals 127 or 128 the department recommends the board take no action on this proposal. The department also needs clarification from the board on the allocation order of the various antlerless hunts in regulation for Unit 20D in the event there is not adequate harvestable surplus to conduct all hunts during the same year.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 130-131

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**PROPOSAL 132 – 5AAC 85.055. Hunting seasons and bag limits for Dall Sheep. 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.**

**PROPOSED BY:** Paul Forward

**WHAT WOULD THE PROPOSAL DO?** This proposal would allocate 20% of the resident only late season Delta Controlled Use Area sheep drawing hunt DS204 to archery only.

**WHAT ARE THE CURRENT REGULATIONS?** The current Dall sheep hunt regulations for the Delta Controlled Use Area can be found in 5 AAC 85.055 and 5 AAC 92.057 and in the 2023–2024 Alaska Hunting Regulations.

**5 AAC 85.055**

**Units and Bag Limits**

Units 13 and 20, those portions known as the Delta Controlled Use Area; up to 150 permits will be issued. Season dates: August 10–September 20.

**RESIDENT HUNTERS:**

1 ram with full-curl horn or larger, by drawing permit only.

**NONRESIDENT HUNTERS:**

1 ram with full-curl horn or larger; every 4 regulatory years, by drawing permit only.

**5 AAC 92.057**

...

(b) The department shall issue Dall sheep permits as follows:

(5) Units 13(B), 20(A) and 20(D), those portions within the Delta Controlled Use Area: the department shall issue a maximum of 10 percent of the drawing permits to nonresidents and a minimum of 90 percent of the drawing permits to residents; in the Delta Controlled Use Area a nonresident does not have to meet the requirements in (a) of the section.

“(6) The department shall issue a maximum of 20 percent of the drawing permits allocated to nonresidents in (2), (3), (4), and (5), of this subsection to nonresidents accompanied by a resident over 19 years of age who is the spouse or other relative of the applicant within the second degree of kindred, as described in AS 16.05.407(a).”

There is a negative customary and traditional use finding for Dall sheep in the Delta Junction Management Area, a portion of which is contained within the Delta Controlled Use Area (5 AAC 99.025(10)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, the total number of permits available would not be increased, but instead 20% of the available DS204 permits would be allocated to an archery only hunt. This would decrease the permits available to those hunting with rifles. This may decrease the overall number of sheep harvested in the Delta Controlled Use Area as archery only hunters are less successful than rifle hunters.

**BACKGROUND:** This proposal will likely decrease harvest for sheep in the DCUA. There have not been any successful DS204 hunt reports with a bow and arrow during the last 20 years.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy and thus limits the harvest to a sustainable level without any further restrictions. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative proposal. There are no biological concerns, and the department acknowledges that few additional sheep will be harvested by archers. If the board is interested in creating an archery hunt in the area it may wish to have the hunt outside of the existing DS204 timeframe to avoid hunter crowding. If the board wishes to create an archery only sheep hunt for the DCUA, the department recommends season dates of August 1–August 9 before the DS203 hunt, or starting September 21 when the DS204 hunt concludes. If the board is interested in holding the archery hunt either before or after the existing hunt, it is important to note that airplanes cannot be used to spot sheep between August 10 and September 20, but can be used outside of those dates.

**COST ANALYSIS:** Approval of this proposal is not expected to result in any additional direct costs for the department.

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**PROPOSAL 133 – 5AAC 85.055. Hunting seasons and bag limits for Dall Sheep.**  
**5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.**

**PROPOSED BY:** Paul Forward

**WHAT WOULD THE PROPOSAL DO?** This proposal would allocate 20% of the resident only early season Delta Controlled Use Area sheep drawing hunt DS203 to archery only.

**WHAT ARE THE CURRENT REGULATIONS?** The current Dall sheep hunt regulations for the Delta Controlled Use Area can be found in 5 AAC 85.055 and 5 AAC 92.057 and in the 2023–2024 Alaska Hunting Regulations.

**5 AAC 85.055**

**Units and Bag Limits**

Units 13 and 20, those portions known as the Delta Controlled Use Area; up to 150 permits will be issued. Season dates: August 10–September 20.

**RESIDENT HUNTERS:**

1 ram with full-curl horn or larger, by drawing permit only.

**NONRESIDENT HUNTERS:**

1 ram with full-curl horn or larger; every 4 regulatory years, by drawing permit only.

**5 AAC 92.057**

...

(b) The department shall issue Dall sheep permits as follows:

(5) Units 13(B), 20(A) and 20(D), those portions within the Delta Controlled Use Area: the department shall issue a maximum of 10 percent of the drawing permits to nonresidents and a minimum of 90 percent of the drawing permits to residents; in the Delta Controlled Use Area a nonresident does not have to meet the requirements in (a) of the section.

“(6) The department shall issue a maximum of 20 percent of the drawing permits allocated to nonresidents in (2), (3), (4), and (5), of this subsection to nonresidents accompanied by a resident over 19 years of age who is the spouse or other relative of the applicant within the second degree of kindred, as described in AS 16.05.407(a).”

There is a negative customary and traditional use finding for Dall sheep in the Delta Junction Management Area, a portion of which is contained within the Delta Controlled Use Area (5 AAC 99.025(10)).

5 AAC 92.085. Unlawful methods of taking big game, exceptions

(8) a person who has been airborne may not take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. following the day in which the flying occurred, and from August 10 through September 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during the open sheep hunting season, however, aircraft other than helicopters may be used by and for sheep hunters to place and remove hunters and camps, maintain existing camps, and salvage harvested sheep. The Board of Game finding 2016-213-BOG, dated March 17, 2016, is adopted by reference. This prohibition does not prohibit any flight maneuvers that are necessary to make an informed and safe landing in the field.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, the total number of permits available would not be increased, but instead 20% of the available DS203 permits would be allocated to an archery only hunt. This hunt would take place during the existing 10 August – 25 August DS203 hunt period or during a 1 August – 10 August time period. This would decrease the permits available to those hunting with rifles.

**BACKGROUND:** This proposal will likely decrease harvest for sheep in the DCUA during the DS203 hunt under either option the proponent suggests. Currently, hunters can use archery equipment to hunt sheep if they draw a DS203 permit. There has been only 1 successful DS203 hunt report with a bow in the last 20 years.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy and thus limits the harvest to a sustainable level without any further restrictions. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes.

Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative proposal. There are no biological concerns, and the department acknowledges that few additional sheep may be harvested if this proposal is adopted. If the board is interested in creating an archery hunt in the area it may wish to have the hunt outside of the DS203 timeframe though to avoid hunter crowding. If the board wishes to create an archery only sheep hunt for the DCUA the

department recommends holding it August 1–August 9 before the DS203 hunt or starting September 21 when the DS204 hunt concludes. If the board is interested in holding the archery hunt either before or after the existing hunt, it is important to note that airplanes cannot be used to spot sheep between August 10 and September 20, but can be used outside of those dates.

**COST ANALYSIS:** Approval of this proposal is not expected to result in any additional direct costs for the department.

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**PROPOSAL 134 – 5 AAC 85.055. Hunting seasons and bag limits for Dall Sheep.**

**PROPOSED BY:** Donald Lee III

**WHAT WOULD THE PROPOSAL DO?** This proposal would reduce the frequency in which an applicant could be awarded drawing permit DS206, Mt. Harper sheep, to once every four years or once per lifetime.

**WHAT ARE THE CURRENT REGULATIONS?**

DS206 (Mt. Harper) drawing area. Unit 20D and Unit 20E; north of the Alaska Highway and north and west of the north bank of the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage.

- Residents – One ram with full-curl horn or larger by drawing permit.
- Nonresidents – One ram with full-curl horn or larger every four regulatory years by drawing permit.
- No applicant may win the same hunt two years in a row. Therefore, whether successful or not, no hunter can hunt this area two years in a row and if a nonresident harvests a sheep they are not eligible to hunt in this area for four regulatory years.

There is a negative customary and traditional use finding for Dall sheep in Unit 20, those portions within the Tok Management Area, the Delta Controlled Use Area, and the Mt. Harper draw area (5 AAC 99.025(10)). The Mt. Harper draw hunt area contains portions of units 20D and 20E for which no customary and traditional use finding of Dall sheep has been made.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted under the one permit every four regulatory years recommendation, all applicants regardless of residency status would only be eligible to win a permit for this area once every four regulatory years. If adopted under the one per lifetime recommendation, all applicants regardless of residency status would only be allowed to win a permit once per lifetime to hunt sheep in this area. This proposal will not change the number of permits available for the hunt.

**BACKGROUND:** The DS206 Mt. Harper sheep drawing area is approximately 240 square miles of sheep habitat on the borders of northern Unit 20D, 20B, and 20E and is bordered on the north by the Yukon-Charley Rivers National Preserve. The Dall sheep population in the Tanana

Hills/Mt. Harper area is comprised of numerous small, discrete groups of sheep separated by areas of unsuitable habitat. This population persists at low density because the physical geography of the area has limited Dall sheep habitat. The Mt. Harper drawing area is only one small area used by the greater Tanana Hills Dall sheep population. The DS206 Mt. Harper sheep drawing permit structure has been in place since 1984 and was established to limit hunter numbers and provide aesthetically pleasing hunting conditions in this more easily accessible area of the Tanana Hills that is known for large trophy rams. The remaining area of the Tanana Hills can be hunted under general season regulations.

Historically, approximately 100 sheep were observed in this area during annual aerial surveys. However, the number of sheep observed in the survey area has been in decline during the last two surveys in 2020 and 2023 with 52 sheep and 28 sheep observed, respectively. Since 2017, when the current draw structure (hunters can apply for the same hunt up to 6 times) started, the average number of DS206 applications has been 817 with 766 resident applications and 51 nonresidents applications. A total of 4 permits have been awarded annually since the hunt was created in 1984. In 2024, the department is planning to issue only 2 permits for this drawing permit hunt area. Since 2017, no hunter has been drawn for the permit more than once and only 4 nonresidents have ever received a permit.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy and thus limits the harvest to a sustainable level without any further restrictions. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes in the following years. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes an additional limitation on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth. Furthermore, this hunt is limited by the use of drawing permit, based on the most current survey data.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative proposal and has no biological concerns for the sheep population in this area because it is managed under the full-curl management strategy with a very limited amount of drawing permits issued annually.

**COST ANALYSIS:** Approval of this proposal is not expected to result in any additional direct costs for the department.

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**PROPOSAL 135 – 5 AAC 85.055. Hunting seasons and bag limits for Dall Sheep.**

**PROPOSED BY:** Donald Lee III

**WHAT WOULD THE PROPOSAL DO?** This proposal would permanently close the Mt. Harper DS206 sheep hunt to nonresidents.

**WHAT ARE THE CURRENT REGULATIONS?**

DS206 (Mt. Harper) drawing area. Unit 20D and Unit 20E; north of the Alaska Highway and north and west of the north bank of the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage.

- Residents – One ram with full-curl horn or larger by drawing permit.
- Nonresidents – One ram with full-curl horn or larger every four regulatory years by drawing permit.
- No applicant may win the same hunt two years in a row. Therefore, whether successful or not, no hunter can hunt this area two years in a row, and if a nonresident harvests a sheep they are not eligible to hunt in this area for four regulatory years.

There is a negative customary and traditional use finding for Dall sheep in Unit 20, those portions within the Tok Management Area, the Delta Controlled Use Area, and the Mt. Harper draw area (5 AAC 99.025(10)). The Mt. Harper draw hunt area contains portions of units 20D and 20E for which no customary and traditional use finding of Dall sheep has been made.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, nonresidents would no longer be eligible to apply for and win a drawing hunt to hunt sheep in this area. This proposal does not change the number of permits awarded for DS206.

**BACKGROUND:** The DS206 Mt. Harper sheep drawing area is approximately 240 square miles of sheep habitat on the borders of northern Unit 20D, 20B, and 20E and is bordered on the north by the Yukon-Charley Rivers National Preserve. The Dall sheep population in the Tanana Hills/Mt. Harper area is comprised of numerous small, discrete groups of sheep separated by areas of unsuitable habitat. This population persists at low density because the physical geography of the area has limited Dall sheep habitat. The Mt. Harper drawing area is only one small area used by the greater Tanana Hills Dall sheep population. The DS206 Mt. Harper sheep drawing permit structure has been in place since 1984 and was established to limit hunter numbers and provide aesthetically pleasing hunting conditions in this more easily accessible area of the Tanana Hills that is known for large trophy rams. The remaining area of the Tanana Hills can be hunted under general season regulations.

Historically, approximately 100 sheep were observed in this area during annual aerial surveys. However, the number of sheep observed in the survey area has been in decline during the last two surveys in 2020 and 2023 with 52 sheep and 28 sheep observed, respectively. Since 2017,

when the current draw structure (hunters can apply for the same hunt up to 6 times) started, the average number of DS206 applications has been 817 with 766 resident applications and 51 nonresidents applications. A total of 4 permits have been awarded annually since the hunt was created in 1984. In 2024 the department is planning to issue only 2 permits for this drawing permit hunt area. Since 2017, no hunter has been awarded the permit more than once, and only 4 nonresidents have ever received a permit.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy and thus limits the harvest to a sustainable level without any further restrictions. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes in the following years. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes an additional limitation on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth. Furthermore, this hunt is limited by the use of drawing permit, based on the most current survey data.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative proposal and has no biological concerns for the sheep population in this area being it is managed under the full-curl management strategy with a very limited amount of draw permits issued annually.

**COST ANALYSIS:** Approval of this proposal is not expected to result in any additional direct costs for the department.

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**PROPOSAL 136 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Expand the area in Unit 20D where brown/grizzly bears can be taken over bait to include southern Unit 20D, and require a registration permit.

**PROPOSED BY:** Nicholaus Solomon.

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow harvest of brown bears at bear bait stations in the portion of Unit 20D south of the Tanana River with a registration permit. This would align baiting for both brown bears and black bears in all of Unit 20D, during the April 15–June 30 bear baiting season. A registration permit would only be required during the baiting season, whether hunting over bait or not.

## **WHAT ARE THE CURRENT REGULATIONS?**

Resident and nonresident hunters: Unit 20D; one brown/grizzly bear every regulatory year, August 10–June 30.

- Brown/grizzly bears are allowed to be taken over bait in Unit 20D north of the Tanana River during April 15–June 30
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- Cubs and sows with cubs may not be taken.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing brown bears is required within 30 days of harvest.

Refer to the *2023–2024 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

There is a positive customary and traditional use determination for brown/grizzly bears in Unit 20D outside of the Fairbanks Nonsubsistence Area with an amount necessary for subsistence (ANS) range of 1–2 bears.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would allow harvest of brown/grizzly bears over bait in the portion of Unit 20D south of the Tanana River under a registration permit. All hunters targeting brown bears would need to obtain a registration permit during the April 15–June 30 season whether they are hunting over bait or not. An increase in harvest of brown bears is anticipated if this proposal is adopted.

**BACKGROUND:** The Unit 20D brown bear harvest objective is 5–15, with no more than 45% female bears and is based on the estimated population of 185–220 total bears (including 143–167 bears  $\geq 2$ -years old). These population estimates are based on extrapolations from neighboring game management units (GMUs) based on similar habitats. The average 10-year harvest is 12 bears per year (range = 6–18). Harvest initially increased when baiting was allowed in the northern part of the unit in RY17–RY19; harvest then leveled off and is comparable with pre baiting numbers. A similar pattern has been observed in other interior GMUs where brown/grizzly bear regulations have been expanded to allow take over bait. Recent literature published by Brockman et al. (2020) demonstrated that brown/grizzly bears can sustain harvest rates of 8% or more without resulting in a decline at the population level as long as reproductive females and their dependent offspring are protected. Therefore, the conservative approach that has historically been applied to interior Alaska brown bear management which uses a 2–5% harvest rate may not be necessary. Brockman et al, did observe a 2–4% annual population decline when harvest approached 15% indicating a potential harvest rate threshold that should not be exceeded when managing for a stable population. McLellan et al. (2016) also suggests that grizzly bear populations in good habitat could sustain human-caused mortality rates at  $\geq 10\%$ .

Based on the most recent research, high public interest for brown/grizzly baiting in this area, and an observed decline in harvest after an initial spike of post baiting interest, additional harvest of brown/grizzly bears in Unit 20D is likely to be sustainable. The current upper end of the

management harvest objective is 15 bears, which is a 6% harvest rate based on extrapolated population estimates and the current 10-year harvest average from RY13–RY22 is 12 bears. Based on the recommendations above, and allowing up to a 10% harvest annually based on population estimates, we could harvest as many as 10 more bears per year from the current average harvest of 12, for a total of 22 bears. Despite evidence that suggests additional harvestable surplus is available, because this area is highly accessible and has a lot of public interest caution may be prudent to avoid exceeding allowable harvest rates, particularly for the female component of the population. A registration permit hunt would allow the department to quickly close the season if warranted.

Black bear baiting is popular in Unit 20D, with an average of 70 bear bait stations registered during RY18–RY22. Nearly 75% of Unit 20D bait stations are in southern Unit 20D where access is well-developed and most brown bear harvest already occurs. In northern Unit 20D from RY17–RY22, an average of 5 bears per year were taken over bait (37%) annually and the remainder (63%) were taken without the aid of bait in the proposed area primarily during the month of June.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal because the department recognizes the brown bear population can support an increase in harvest. However, the department does have a concern that harvest could exceed sustainable levels because southern Unit 20D is easily accessible due to an extensive trail and road network and there are a high number of black bear bait stations. The registration permit component of this proposal, with a 2-day harvest reporting requirement, provides the department the regulatory mechanism to close the season early, if necessary, to ensure the estimated harvestable surplus is not exceeded. The board may wish to consider allowing hunters to take brown bears at bait stations the same day they have flown, provided the hunter is 300 feet from the airplane. Consideration of adding the take the same day the hunter has been airborne simplifies the regulations and would make this match other places where the board has allowed the take of brown bears over bait.

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

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**PROPOSAL 137 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Expand the area in Unit 20D where brown/grizzly bears can be taken over bait to include southern Unit 20D.

**PROPOSED BY:** Tyrel Palmer

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow harvest of brown bears at bear bait stations in the portion of Unit 20D south of the Tanana River. This would align baiting for both brown bears and black bears in all of Unit 20D, during the April 15–June 30 bear baiting season.

**WHAT ARE THE CURRENT REGULATIONS?**



Resident and nonresident hunters: Unit 20D; one brown/grizzly bear every regulatory year, August 10–June 30.

- Brown/grizzly bears are allowed to be taken over bait in Unit 20D north of the Tanana River during April 15–June 30
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- Cubs and sows with cubs may not be taken.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing brown bears is required within 30 days of harvest.

Refer to the *2023–2024 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

There is a positive customary and traditional use determination for brown/grizzly bears in Unit 20D outside of the Fairbanks Nonsubsistence Area with an amount reasonably necessary for subsistence (ANS) range of 1–2 bears (5 AAC 99.025(3)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would allow harvest of brown/grizzly bears over bait in the portion of Unit 20D south of the Tanana River. If adopted, this proposal is expected to increase the 20D brown bear harvest.

**BACKGROUND:** The Unit 20D brown bear harvest objective is 5–15, with no more than 45% female bears and is based on the estimated population of 185–220 total bears (including 143–167 bears  $\geq 2$  years old). The average 10-year harvest is 12 bears per year (range = 6–18). Harvest initially increased when baiting was allowed in the northern part of the unit in RY17–RY19; harvest then leveled off and is comparable with pre-baiting numbers. A similar trend has been observed in other interior Alaska GMUs when brown/grizzly bears were first allowed to be taken over bait. Recent literature published by Brockman et al. (2020) showed brown/grizzly bears can handle harvest rates at 8% or more without seeing a decline in the population as long as reproductive females and their dependent offspring are protected. Therefore, the cautious approach that has traditionally been applied to interior Alaska brown bear management of managing at a 2–5% harvest rate may not be necessary. Brockman et al. also observed a 2–4% annual decline when harvest approached 15%, indicating that a 15% harvest rate exceeds a conservative harvest approach when managing for a stable population. McLellan et al. (2016) also suggest that grizzly bear populations in good habitat could sustain human-caused mortality rates at  $\geq 10\%$ .

Based on the most recent research, high public interest for brown/grizzly baiting in this area, and an observed decline in harvest after an initial spike of post-baiting interest, additional harvest of brown/grizzly bears in Unit 20D is likely to be sustainable. The current upper end of the management harvest objective is 15 bears which is a 6% harvest rate based on extrapolated population estimates, and the current 10-year harvest average from RY13–RY22 is 12 bears. Based on the recommendations above and allowing up to a 10% harvest annually based on population estimates we could harvest as many as 10 more bears per year from the current average harvest of 12, for a total of 22 bears annually. Despite evidence that suggests additional

harvestable surplus is available, because this area is highly accessible and has a lot of public interest caution may be prudent to avoid exceeding allowable harvest rates, particularly for the female component of the population.

Black bear baiting is popular in Unit 20D, with an average of 70 bear bait stations registered during RY18–RY22. Nearly 75% of Unit 20D bait stations are in southern Unit 20D where access is well-developed and most brown bear harvest already occurs. In northern Unit 20D from RY17–RY22, an average of 5 bears per year were taken over bait (37%) annually and the remainder (63%) were taken without the aid of bait in the proposed area.

Due to the high density of black bear stations and extensive trails and roads throughout the area, there’s a high likelihood that, if adopted, this proposal would lead to increased harvest.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal with **AMMEDMENTS** because of biological concerns that an increase in harvest may exceed estimates of sustained yield if the season were to extend to June 30. Harvest data across many interior Alaska GMUs demonstrate that a large percentage of the brown/grizzly bear harvest occurs in the month of June (including Unit 20D). Therefore, if the board is interested in adopting the proposal, the department recommends the proposal be amended to close the brown/grizzly bear hunting season May 31 in the proposed area (no changes in northern Unit 20D, north of the Tanana River). An amendment to close the season in the proposed area on May 31 would likely be sustainable and could be used to evaluate the effect of the regulatory change on harvest, and if the baiting season could be further extended in future years. For consistency with other areas where the take of brown bears is allowed at bait stations, and to reduce regulatory complexity which makes it easier for hunters to comply with hunting regulations, the board may wish to consider allowing hunters to take brown bears at bait sites the same day they have flown, provided the hunter is 300 feet from the airplane.

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

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**PROPOSAL 138 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Expand the area in Unit 20D where brown/grizzly bears can be taken over bait to include southern Unit 20D.

**PROPOSED BY:** Delta Junction Fish and Game Advisory Committee.

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow harvest of brown bears at bear bait stations in the portion of Unit 20D south of the Tanana River. This would align baiting for both brown bears and black bears in all of Unit 20D, during the April 15–June 30 bear baiting season.

**WHAT ARE THE CURRENT REGULATIONS?**

Resident and nonresident hunters: Unit 20D; one brown/grizzly bear every regulatory year, August 10–June 30.

- Brown/grizzly bears are allowed to be taken over bait in Unit 20D north of the Tanana River during April 15–June 30
- Same-day-airborne hunting at bait stations is permitted, provided the hunter is at least 300 feet from the airplane.
- Cubs and sows with cubs may not be taken.
- Hunters must salvage the entire hide (including claws attached) and skull of a brown bear.
- Sealing brown bears is required within 30 days of harvest.

Refer to the *2023–2024 Alaska Hunting Regulations* for specific details about brown bear hunting seasons, methods, salvage, and other requirements.

There is a positive customary and traditional use determination for brown/grizzly bears in Unit 20D outside of the Fairbanks Nonsubsistence Area with an amount reasonably necessary for subsistence (ANS) range of 1–2 bears (5 AAC 99.025(3)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would allow harvest of brown/grizzly bears over bait in the portion of Unit 20D south of the Tanana River. If adopted, an increase in brown bear harvest is expected.

**BACKGROUND:** The Unit 20D brown bear harvest objective is 5–15, with no more than 45% female bears and is based on the estimated population of 185–220 total bears (including 143–167 bears  $\geq 2$  years old). The average 10-year harvest is 12 bears per year (range = 6–18). Harvest initially increased when baiting was allowed in the northern part of the unit in RY17–RY19, harvest has since leveled off and is comparable with pre-baiting numbers. A similar trend has been observed in other interior Alaska game management units (GMUs) when brown/grizzly bears were first allowed to be taken over bait. Recent literature published by Brockman et al. (2020) showed brown/grizzly bears can handle harvest rates at 8% or more without seeing a decline in the population as long as reproductive females and their dependent offspring are protected. Therefore, the cautious approach that has traditionally been applied to interior Alaska brown bear management of managing at a 2–5% harvest rate may not be necessary. Brockman et al. also observed a 2–4% annual decline when harvest approached 15%, indicating that a 15% harvest rate exceeds a conservative harvest approach when managing for a stable population. McLellan et al. (2016) also suggest that grizzly bear populations in good habitat could sustain human-caused mortality rates at  $\geq 10\%$ .

Based on the most recent research, high public interest for brown/grizzly baiting in this area, and an observed decline in harvest after an initial spike of post-baiting interest, additional harvest of brown/grizzly bears in Unit 20D is likely to be sustainable. The current upper end of the management harvest objective is 15 bears, which is a 6% harvest rate based on extrapolated population estimates, and the current 10-year harvest average from RY13–RY22 is 12 bears. Based on the recommendations above and allowing up to a 10% harvest annually based on population estimates we could harvest as many as 10 more bears per year from the current average harvest of 12, for a total of 22 bears annually. Despite evidence that suggests additional harvestable surplus is available, because this area is highly accessible and has a lot of public interest caution may be prudent to avoid exceeding allowable harvest rates, particularly for the female component of the population.

Black bear baiting is popular in Unit 20D, with an average of 70 bear bait stations registered during RY18–RY22. Nearly 75% of Unit 20D bait stations are in southern Unit 20D where access is well-developed and most brown bear harvest already occurs. In northern Unit 20D from RY17–RY22, an average of 5 bears per year were taken over bait (37%) annually and the remainder (63%) were taken without the aid of bait in the proposed area.

Due to the high density of black bear stations and extensive trails and roads throughout the area, there's a high likelihood that, if adopted, this proposal would lead to increased harvest.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal with **AMMENDMENTS** because of biological concerns that an increase in harvest may exceed estimates of sustained yield if the season were to extend to June 30. Harvest data across many interior Alaska GMUs demonstrate that a large percentage of the brown/grizzly bear harvest occurs in the month of June (including Unit 20D). Therefore, if the board is interested in adopting the proposal, the department recommends the proposal be amended to close the brown/grizzly bear hunting season May 31 in the proposed area (no changes in northern Unit 20D, north of the Tanana River). An amendment to close the season in the proposed area on May 31 would likely be sustainable and could be used to evaluate the effect of the regulatory change on harvest, and if the baiting season could be further extended in future years. For consistency with other areas where the take of brown bears is allowed at bait sites, and to reduce regulatory complexity which makes it easier for hunters to comply with hunting regulations, the board may wish to consider allowing hunters to take brown bears at bait stations the same day they have flown, provided the hunter is 300 feet from the airplane.

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

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Proposal 139

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**PROPOSAL 140** – 5 AAC 85.025 (a)(16)(19). **Close the nonresident seasons for caribou in the remainder portion of Unit 21D, the remainder portion of Unit 24B, and all of Units 24C and 24D.** Close Nonresident caribou seasons in the remainder portion of Unit 21D, the remainder portion of Unit 24B, and all of Units 24C and 24D.

**PROPOSED BY:** Western Arctic Caribou Herd Working Group

**WHAT WOULD THE PROPOSAL DO?** This proposal will close the nonresident seasons in the Western Arctic Caribou Herd (WAH) range in Units 21D, 24B, 24C, and 24D.

**WHAT ARE THE CURRENT REGULATIONS?**

**Resident  
Open Season**

Units and Bag Limits	(Subsistence and General Hunts)	Nonresident Open Season
5 AAC 85.025 (a)		
...		
(16)		
...		
Remainder of Unit 21(D)		
RESIDENT HUNTERS:		
5 caribou per day; as follows:		
up to 5 bulls per day; however, calves may not be taken;	July 1 – Oct. 14 Feb. 1 – June 30	
up to 5 cows per day; however, calves may not be taken;	Sept. 1 – Mar. 31	
NONRESIDENT HUNTERS:		
1 bull; however, calves may not be taken		Aug. 1 – Sept. 30
....		
(19)		
...		
Remainder of 24(B)		
RESIDENT HUNTERS:		
5 caribou per day, as follows: up to 5 bulls per day; however calves may not be taken	July 1 - Oct. 14 Feb. 1 - June 30	
up to 5 cows per day; however calves may not be taken	July 15 - Apr. 30	
NONRESIDENT HUNTERS:		
1 bull; however calves may not be taken		Aug. 1- Sept. 30

Units 24(C) and 24(D)

RESIDENT HUNTERS:

5 caribou per day, as follows:  
up to 5 bulls per day; however,  
calves may not be taken;

July 1 - Oct. 14  
Feb. 1 - June 30

up to 5 cows per day; however  
calves may not be taken;

Sept. 1 - Mar. 31

NONRESIDENT HUNTERS:

1 bull; however, calves may not  
be taken

Aug. 1 - Sept. 30

...

There is a positive customary and traditional use finding for the WAH and the Teshekpuk Lake Herd in units 21, 22, 23, 24 and 26. The amount reasonably necessary for subsistence for these herds combined is 8,000 to 12,000 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal will close nonresident seasons in Units 21D, 24B, 24C, and 24D. The current regulation provides an opportunity to harvest caribou when any of the large Arctic herds are present within these units, which are on the periphery of the core summer and migratory ranges. Use can be infrequent, with the predominant herd's use of these units varying from year to year. Some communities within or adjacent to these units rely heavily on this resource (e.g. Anaktuvuk Pass), but other communities may have limited access (e.g. Huslia). This proposal would reduce nonresident opportunity to harvest caribou from herds that are at or above population objectives like the Porcupine, Teshekpuk, or Central Arctic herds, as well as the Western Arctic Herd, which is in decline. Therefore, this proposal does not solely affect the harvest of WAH, and predominantly effects the other herds in the area that are at or above population objectives. The current regulation provides harvest opportunity from herds when they are available, and generally results in very little harvest opportunity when any one of those herds is absent. While the WAH may not have harvestable surplus, these other herds do. If these herds with a harvestable surplus range into Units 21 and 24 this proposal would not allow harvest on that surplus.

**BACKGROUND:** The units affected by this proposal include Units 21D, 24B, 24C, and 24D which are on the periphery of the ranges of the Western Arctic, Teshekpuk, Central Arctic, and Porcupine herds. There are also four small non-migratory herds managed by the Galena Area Office, the Galena Mountain Herd (100-150 caribou), Wolf Mountain Herd (500-600 caribou),

Ray Mountains Herd (800-1,000 caribou), and Hodzana Hills Herd (500-600 caribou). The regulations for the four small herds are not affected by this proposal.

When any of the large arctic herds increase, they expand their range into the Galena Management Area units, and harvest opportunity increases. A static regulation (including a fall nonresident opportunity) is a reasonable management strategy because it adapts to whichever herd may expand into the area at any given time, but it has no effect on a herd when it recedes and is mostly absent from the units.

Reported nonresident harvest of WAH for the last ten regulatory years (RY13-RY22) in Units 21D, 24B, 24C, and 24D, has averaged less than one caribou per year (Table 1). Even during years of expansion into the Galena Management Area, nonresident harvest from the WAH is low because the Arctic herds do not typically migrate into the area until late fall or early winter after most nonresident hunters are gone following the fall hunting season.

**Table 1. Reported harvest of Western Arctic Caribou in Game Management Units 21D, 24B, 24C, and 24D, Regulatory Years 2013-2022.**

<b>YEAR</b>	<b>Resident</b>	<b>Non-Resident</b>	<b>Total</b>
2013	0	1	1
2014	0	0	0
2015	0	1	1
2016	1	1	2
2017	0	0	0
2018	0	0	0
2019	1	0	1
2020	15	0	15
2021	0	0	0
2022	0	0	0

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal for Units 21D, 24B, 24C, and 24D. Nonresident harvest from the WAH is very low, especially when its range recedes from these units, therefore it does not represent a significant source of harvest for the WAH. Harvest opportunity from other large expanding herds will be unnecessarily lost if the regulation is adopted.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 141-144

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**PROPOSAL 145 – 5 AAC 85.045 (a)(19). Reauthorize a winter any-moose season in a portion of Unit 21D.** Reauthorize the antlerless moose hunting season in a portion of Unit 21D.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal will reauthorize a 15-day RM831 registration any-moose season to be announced during March in a portion of Unit 21D. The season has a harvest quota established by the department prior to the beginning of the season, and if the total harvest or harvest of cows reaches the quota, the season will be closed by emergency order.

**WHAT ARE THE CURRENT REGULATIONS?** The RM831 any-moose season is announced by emergency order in March when conditions allow for good success in harvesting moose and closed after 15 days or once the quota is reached.

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

(a)

(19)

...

Unit 21(D), that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek

**RESIDENT HUNTERS:**

1 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25
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1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21(D) remainder; or	Sept. 5–Sept. 25
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1 moose, by registration permit only, up to 15 days during March, however, a person may not take a cow accompanied by a calf	(Winter season to be announced)
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**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 600 permits may be issued in combination with Unit 21(D) remainder

Sept. 5–Sept. 25

...

The Board made a positive customary and traditional use finding (C&T) for moose all of Unit 21 with an established Amount Reasonably Necessary for Subsistence (ANS) of 600–800 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal would continue to allow harvest of a few antlered bulls, antlerless bulls, and cows in March, which is when conditions allow for good success in harvesting moose. Because so few bulls have antlers during March, an any-moose season will have greater success rates than a bulls-only hunt and it will eliminate the need for hunters to make legal-animal determinations. This hunt will provide an opportunity to utilize the current harvestable surplus of cows and bulls, while ensuring overharvest of cows does not occur because of the annual harvest quota.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The goals of this antlerless moose season are to provide additional opportunity during a time of year when conditions allow for good success in harvesting moose, slow the growth of this moose population, and to make progress toward achieving the board’s intensive management (IM) harvest objective of 450–1,000 moose in all of Unit 21D by harvesting cows from this highly productive area.

If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost and our ability to meet Intensive Management (IM) harvest objectives could be compromised. In addition, rather than allow large population expansions and contractions, it is important to manage the population for stability and a consistent harvestable surplus.

The 2019 through 2023 hunts had a 2-day reporting requirement and a quota of 25 moose with no more than 20 cows. Harvest from this hunt will make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. For the March RM831 hunt, 5 cows and 3 bulls were harvested in 2019, 11 cows and 3 bulls were harvested in 2020, 7 cows and 1 bull in 2021 and no moose were reported harvested in 2022 or 2023.

Unit 21D has a positive finding for intensive management (IM), with IM objectives of a population of 7,000–10,000 and harvest of 450–1,000 moose. The IM harvest objective has not been met since 2003 when the estimated harvest was 489 moose. The average estimated harvest during regulatory years 2013–2022 was 398 moose, including reported and estimated unreported harvest. The overall Unit 21D population estimate at the end of 2018 was 10,478 moose ( $\pm 1,572$ ) and has likely changed very little based on recent trend area surveys. The current estimated combined harvestable surplus is 1,095 moose for Unit 21.

This antlerless moose hunt area is approximately 2,559 mi<sup>2</sup> (21%) of the 12,093.6 mi<sup>2</sup> encompassed by Unit 21D. Moose abundance in the proposal hunt area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the estimated total Unit 21D moose population.

The moose population in this portion of 21D is increasing, especially the number of cows in the population. Analysis of the combined Trend Count Areas (TCA) (i.e., Squirrel Creek, Pilot Mtn., and Kaiyuh Slough TCAs) within the hunt area showed an increasing trend in moose abundance among all age classes from 2001 to present. Additionally, the Geospatial Population Estimate data also showed a statistically significant increase from 1,897 (±11%) moose in 2011 to 4,116 (±10%) moose in 2017. Moose twinning data for the winter any-moose hunt area showed high twinning rates since RY03 (average = 35.8%), however the 3-year average (RY20-22) declined to 26.0%.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Additional harvest opportunity, including the harvest of cows, exists in this portion of 21D.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs for the department.

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**PROPOSAL 146 – 5 AAC 92.110; 5 AAC 92.111. Control of predation by wolves and an Intensive Management Plan in Units 24A and 25A.** Implement control of predation by wolves and adopt an Intensive Management Plan on State lands in Units 24A and 25A.

**PROPOSED BY:** Jonah Stewart

**WHAT WOULD THE PROPOSAL DO?** This proposal would authorize the department to implement control of predation by wolves on State lands in Units 24A and 25A.

**WHAT ARE THE CURRENT REGULATIONS?**

Units 24A and 25A do not currently have an Intensive Management plan in regulation.

The board has made the following Intensive Management Findings in Units 24A and 25A:

5 AAC 92.108

Population	Finding	Population Objective	Harvest Objective
Caribou			
Central Arctic	Positive	28,000 – 32,000	1,400 – 1,600
Porcupine	Positive	100,000 – 150,000	1,500 – 2,000

Moose

GMU 24(A)	Positive	1,200 – 1,500	75 – 125
GMU 25(A)	Negative		

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal will allow the department to remove wolves on State lands in Units 24A and 25A and develop an Intensive Management Plan for moose on State lands in Unit 24A. Adoption of an IM plan provides an opportunity to conduct predator control for the removal of bears or wolves; and/or habitat enhancement to benefit moose or caribou populations.

**BACKGROUND:** Unit 24A encompasses 4,143 mi<sup>2</sup> and Unit 25A encompasses 21,317 mi<sup>2</sup>. In Unit 24A, only 6% (251 mi<sup>2</sup>) of the unit is State land, and a combined total of 16% of the unit is state-managed land (state and private lands). In Unit 25A, only 15% (3,136 mi<sup>2</sup>) of the Unit is State land, with a combined total of 22% of the Unit is state-managed land (state and private lands). Therefore, for Units 24A and 25A combined, federal lands comprise 19,832 mi<sup>2</sup> (78%) of the total area (25,460 mi<sup>2</sup>). Unit 25A federal lands are mostly National Wildlife Refuge lands while 24A is mostly Bureau of Land Management and National Park Service lands. Most state lands in the proposed area are found in a single contiguous block of land within the Teedriinjik River (Chandalar) Drainage of Unit 25A.

This proposal identifies moose, caribou, and other ungulates as the prey species of concern and requests control of predation by wolves and an Intensive Management Plan in 24A and 25A. the department conducted a IM feasibility assessment for Unit 25D in 2012 and the department and Board of Game determined that an IM program was not feasible. There have been no significant changes since the 2012 assessment, and the feasibility considerations for Units 25D and 25A are comparable. Because sheep are not an Intensive Management (IM) species (5 AAC 92.106), and moose have a negative IM finding in Unit 25A (5 AAC 92.108), consideration for IM can only be given for moose and caribou in Unit 24A and for caribou in Unit 25A at this time.

The only two IM caribou herds occupying Units 24A and 25A are the Porcupine Caribou Herd (PCH) and Central Arctic Caribou Herd (CAH). Both herds are increasing and expanding their range in Units 24A and 25A and currently meet or exceed their IM population objectives.

Moose densities in Unit 24A are consistently low and surveys in the Middle Fork Koyukuk River Trend Count Area indicate relatively stable density and composition of calves and bulls. Most of 24A occurs in the mountainous terrain of the Brooks Range and suitable moose habitat is limited to narrow riparian zones along creeks and rivers. The Brooks Range is near the northern extent of moose range, so moose densities are low due to habitat/environmental constraints. The department does not expect wolf control to result in a meaningful response in moose populations where environmental factors are the primary limiting factors. Additionally, information is needed to determine the relative importance of grizzly bear and black bear predation on moose in this area. An IM program implemented in Unit 24B in 2013-2017 did not result in a statistically

significant increase in moose calf (5-mo. old to 12-mo. old) or yearling survival or a statistically significant population increase (pers. comm., G. Stout, 2023).

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal, for Units 24A and 25A. Increasing survival of the CAH and PCH caribou herds is currently not warranted, because they are above objective and because an increase in those herds could reduce carrying capacity where their range overlaps sheep habitat. Therefore, regarding this proposal’s broad request for Intensive Management to benefit moose, caribou, and other ungulates consideration for IM is currently only applicable for moose in Unit 24A. Additionally, considering the environmental and biological factors and the limited amount of state lands in 24A, a moose IM plan for wolf predation control is likely not feasible.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 147 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions; 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions; and 5 AAC 92.039. Permit for taking wolves using aircraft.** Allow the take of wolves using an aircraft the same day a person has been airborne in Units 24 and 25.

**PROPOSED BY:** Jonah Stewart

**WHAT WOULD THE PROPOSAL DO?** This proposal would allow the use of aircraft to take wolves same day airborne (SDA) in Units 24 and 25. Same day airborne could include airborne and/or land-and-shoot take. However, same day airborne take of wolves is only allowed if permitted as part of an active intensive management (IM) plan.

**WHAT ARE THE CURRENT REGULATIONS?**

**Sec. 16.05.783. Same day airborne hunting.** (a) a person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne. However, the Board of Game may authorize a predator control program that allows airborne or same day airborne shooting...

**5 AAC 92.039. Permit for taking wolves using aircraft.** (a) a person may not use an aircraft to land and shoot a wolf without first obtaining a permit from the department. (b) a person may not use an aircraft to take a wolf by aerial shooting without first obtaining a permit from the department. (c) a person may not use a helicopter for helicopter trapping of wolves without first obtaining a permit from the department. ...

**5 AAC 92.085. Unlawful methods of taking big game.** ... (8) a person who has been airborne may not use a firearm to take or assist in taking a big game animal and a person may not be

assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. on the day following the day in which the flying occurred, ...

**5 AAC 92.095. Unlawful methods of taking furbearers.** ... (8) a person who has been airborne may not use a firearm to take or assist in taking a wolf or wolverine until after 3:00 a.m. on the day following the day in which the flying occurred; ...

**5 AAC 92.990. Definitions.** ... (9) “big game” means black bear, brown bear, bison, caribou, Sitka black-tailed deer, elk, mountain goat, moose, muskox, Dall sheep, wolf and wolverine; ...

There is a positive customary and traditional use finding for wolves in units 17, 19 – 21, 24, 25, 26(B), and 26(C). The amount reasonably necessary for subsistence is 5 to 20 wolves.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal will allow SDA take of wolves, which falls under the definition of the use of aircraft for taking wolves (5 AAC 92.039), in Units 24 and 25. Wolves are classified as a big game animal and a furbearer, so a methods exception to allow use of aircraft to take wolves SDA should include both regulations (5 AAC 92.085 and 5 AAC 92.095).

**BACKGROUND:** By statute, (AS 16.05.783 (a)) allowing take of wolves using an aircraft SDA can only be authorized where an IM program is adopted. Therefore, this proposal is contingent upon the adoption of an IM program for Units 24 and 25, which is not part of the proposal.

This proposal identifies moose and sheep as the prey species of concern. Because sheep are not an IM species (5 AAC 92.106), and moose have a negative finding for IM in Units 25A/B/C (5 AAC 92.108), IM consideration is currently limited to moose in Unit 24 and Unit 25D.

An IM feasibility assessment was conducted for Unit 25D in 2012 and the department and board determined that an IM program was not feasible. There were no significant changes since the 2012 assessment. Therefore, IM consideration, and consequently SDA consideration, is currently limited to moose in Unit 24.

**Unit 24A** – The Porcupine Caribou Herd (PCH) and Central Arctic Caribou Herd (CAH) are increasing and expanding their range into Unit 24A and currently meet or exceed their IM population objectives. Increasing survival in those growing caribou herds is currently not warranted, as both are above IM population objectives. Unit 24A is 82% federal land [71% Bureau of Land Management (BLM), 2% Fish and Wildlife Service (FWS), 9% National Park Service (NPS)].

Moose densities in Unit 24A are consistently low and surveys in the Middle Fork Koyukuk River Trend Count Area indicate relatively stable density and the composition calves and bulls. Most of 24A occurs in the mountainous terrain of the Brooks Range and suitable moose habitat is limited to narrow riparian zones along creeks and rivers. The Brooks Range is near the northern

extent of moose range, so moose densities are low due to habitat/environmental constraints. Wolf control would not be expected to result in a meaningful response in moose populations where environmental factors are the primary limiting factors. Information is also needed on the relative importance of grizzly bear and black bear predation on moose in this area. Considering these environmental and biological factors, an IM plan for moose or wolf predation control is not likely feasible.

**Unit 24B** – Unit 24B is 64% federal land (38% NPS, 14% FWS, 12% BLM). The northern portion of Unit 24B is primarily NPS lands and occurs in the mountainous terrain of the Brooks Range and is comparable to Unit 24A limiting factors. Marginal moose habitat and NPS lands are likely to preclude the feasibility of an IM program in that portion of 24B. An IM program implemented in Unit 24B south of NPS lands and outside of the Kanuti National Wildlife Refuge (FWS) lands in 2013-2017 did not result in a statistically significant increase in moose calf (5-mo. old to 12-mo. old) or yearling survival or a statistically significant population increase (pers. comm., G. Stout, 2023). Therefore, although feasible, a limited response is expected in Unit 24B because bears are an important predator and severe weather is likely an important limiting factor for moose. The feasibility assessment completed in 2012 for 24B concluded that at best, a modest response in moose abundance could be expected from a program that included only wolf control, which the program results confirmed. An IM program focused solely on the take of wolves over such a large area and where moose are at very low density would likely have a limited or no moose population response, particularly if wolf removal is limited in magnitude.

The Teshekpuk Caribou Herd (TCH) utilizes northern Unit 24B. That herd is increasing and currently meets IM population objectives. Increasing survival in that growing caribou herd is currently not warranted given the potential for range limitations.

**Unit 24C** – Predator-prey dynamics, habitat, and moose densities in Unit 24C are comparable to 24B, so an IM program focused only on the take of wolves would likely only have a limited moose population response. Public participation would also likely be limited because Unit 24C is remote with limited access and lacks support services (e.g., AvGas). Therefore, land status restrictions (2% FWS, 61% BLM, 3% NPS), biological limitations, and a program that does not include bear predation control collectively would likely result in a limited moose population response.

**Unit 24D** – Federal lands comprise 83% of Unit 24D, primarily the Koyukuk National Wildlife Refuge (FWS) (65% FWS, 18% BLM), which precludes feasibility of an IM program (take of wolves using an aircraft SDA) in Unit 24D. Habitat in Unit 24D is excellent for moose and supports high densities, therefore control of bear and wolf predation has the potential for a moose population response. However, moose are declining in Unit 24D, likely due in part to advanced vegetative succession of riparian communities. Additional information is needed to determine whether wolf predation control for moose in this area would result in density dependent effects given the advanced vegetative succession. Moose abundance has responded to recent wildfires in

the lower Koyukuk and Middle Yukon River areas. Suggesting both habitat and predation are likely limiting moose population abundance in 24D. Although habitat enhancement could potentially benefit moose in Unit 24D if permitted by the land manager (i.e., FWS), take of wolves using an aircraft SDA is generally precluded on FWS lands. Therefore, an IM program limited to SDA take of wolves is not likely feasible in Unit 24D.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal, for Units 24 and 25. The analysis of this proposal is complex because SDA can only be authorized where an (IM) program is adopted. Additionally, the scale of the proposed area and inclusion of sheep, caribou, and moose makes an analysis of the potential biological effects difficult to fully assess.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

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**PROPOSAL 148 – 5 AAC 92.110; 5 AAC 92.111. Control of predation by wolves and an Intensive Management Plan in Units 24A and 25A.** Implement control of predation by wolves and adopt an Intensive Management Plan on State lands in Units 24A and 25A.

**PROPOSED BY:** Luke Tyrrell

**WHAT WOULD THE PROPOSAL DO?** This proposal would authorize the department to implement control of predation by wolves and implement an Intensive Management plan on State lands in Units 24A and 25A.

**WHAT ARE THE CURRENT REGULATIONS?**

Units 24A and 25A do not currently have an Intensive Management plan in regulation.

The board has made the following Intensive Management Findings in Units 24A and 25A:

5 AAC 92.108

Population	Finding	Population Objective	Harvest Objective
Caribou			
Central Arctic	Positive	28,000 – 32,000	1,400 – 1,600
Porcupine	Positive	100,000 – 150,000	1,500 – 2,000
Moose			
GMU 24(A)	Positive	1,200 – 1,500	75 – 125
GMU 25(A)	Negative		

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal will allow the department to remove wolves on state lands in 24A and 25A and develop an Intensive Management Plan for moose on state lands in Unit 24A. Adoption of an IM plan provides an opportunity to conduct activities for the removal of bears or wolves and/or habitat enhancement to benefit moose or caribou populations.

**BACKGROUND:** This proposal identifies moose and sheep as the prey species of concern and requests control of predation by wolves and an Intensive Management Plan in 24A and 25A. The department conducted an IM feasibility assessment for Unit 25D in 2012 and the department and Board of Game determined that an IM program was not feasible. There have been no significant changes since the 2012 assessment and the feasibility considerations for Units 25D and 25A are comparable. Because sheep are not an IM species (5 AAC 92.106) and moose have a negative IM finding in Unit 25A (5 AAC 92.108), consideration for IM can only be given for moose and caribou in Unit 24A and for caribou in Unit 25A at this time.

The only two IM caribou herds occupying Units 24A and 25A are the Porcupine Caribou Herd (PCH) and Central Arctic Caribou Herd (CAH). Both herds are increasing and expanding their range in Units 24A and 25A and currently meet or exceed their IM population objectives.

Moose densities in Unit 24A are consistently low and surveys in the Middle Fork Koyukuk River Trend Count Area indicate relatively stable density and composition of calves and bulls. Most of 24A occurs in the mountainous terrain of the Brooks Range and suitable moose habitat is limited to narrow riparian zones along creeks and rivers. The Brooks Range is near the northern extent of moose range, so moose densities are low due to habitat/environmental constraints. The department does not expect wolf control to result in a meaningful response in moose populations where environmental factors are primary limiting factors. Additionally, information is needed to determine the biological efficacy of wolf predation control in this area for the benefit of moose and whether carrying capacity would continue to support sheep densities if caribou increased due to wolf predation control activities. Information is also needed on the relative importance of grizzly bear and black bear predation on moose in this area. An IM program implemented in Unit 24B in 2013-2017 did not result in a statistically significant increase in moose calf (5-mo. old to 12-mo. old) or yearling survival or a statistically significant population increase (pers. comm., G. Stout, 2023).

Unit 24A encompasses 4,143 mi<sup>2</sup> and Unit 25A encompasses 21,317 mi<sup>2</sup>. In Unit 24A, only 6% (251 mi<sup>2</sup>) of the unit is State land, and a combined total of 16% of the unit is state-managed land (state and private lands). In Unit 25A, only 15% (3,136 mi<sup>2</sup>) of the Unit is State land, with a combined total of 22% of the Unit is state-managed land (state and private lands). Therefore, for Units 24A and 25A combined, federal lands comprise 19,832 mi<sup>2</sup> (78%) of the total area (25,460 mi<sup>2</sup>). Unit 25A federal lands are mostly National Wildlife Refuge lands while 24A is mostly



Bureau of Land Management and National Park Service lands. Most state lands in the proposed area are found in a single contiguous block of land within the Teedriinjik River (Chandalar) Drainage of Unit 25A.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal, for Units 24A and 25A. Increasing survival of the CAH and PCH caribou herds is currently not warranted because they are above population objectives and an increase in those herds could reduce carrying capacity where their range overlaps sheep habitat. Therefore, regarding this proposal’s broad request for IM to benefit moose and sheep, consideration for IM is currently only applicable to moose in Unit 24A. Additionally, considering the environmental and biological factors and the limited amount of state lands in 24A, a moose IM plan for wolf predation control is likely not feasible.

**COST ANALYSIS:** Adoption of this proposal would result in additional costs for the department.

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**PROPOSAL 149 – 5 AAC 84.270 (13) Lengthen the wolf trapping season in GMU 24, 25A, 25B, and 25C to open on Oct 1 – Apr 30.** This regulation change would align the wolf trapping season in Units 24, 25A, 25B, and 25C with the wolf trapping season in Units 19D, 21A, and 25D.

**PROPOSED BY:** Jonah Stewart

**WHAT WOULD THE PROPOSAL DO?** This proposal would lengthen the wolf trapping season in Units 24, 25A, 25B, and 25C by one month from Nov 1 – Apr 30 to Oct 1 – April 30.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Species and Units</b>	<b>Open Season</b>	<b>Bag Limit</b>
5 AAC 84.270 Trapping seasons and bag limits for furbearers ...		
(13) Wolf Units 19(D), 21(A), and 25(D)	Oct 1 – Apr 30	No limit.
Remainder of Unit 19, and Units 20 (except 20(D) and 20(E)), 21(B), 21(C),	Nov. 1 – Apr 30	No limit.

21(D), 21(E), 22-24, 25(A),  
25(B), 25(C), and 26

The board has made a positive customary and traditional use finding for wolves in Units 24 and 25 (5 AAC 99.025(11)). The amount reasonably necessary for subsistence uses in Units 24 and 25 is 90% of the harvestable portion of the population.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted the wolf trapping season in Units 24, 25A, 25B and 25C would change from Nov 1 – Apr 30 to Oct 1 – April 30. If adopted, little if any increase in additional wolf harvest is expected with no anticipated biological concerns.

**BACKGROUND:** Average annual wolf trapping harvest for Units 24, 25A, 25B, and 25C is 80 wolves per year (regulatory years (RY)12-22). The average November wolf trapping harvest for Units 24, 25A, 25B, and 25C was 5 wolves per year (RY12-RY22). The small proportion of wolf harvest that takes place in November is likely due to poor hide and fur quality and reduced trail access in November.

The 2018 wolf management report and plan for Unit 24 identified 14 wolves per 1000 square miles. This density estimate was the result of multiple years of minimum wolf counts (MWC). Unit 24 is 26,068 square miles. Extrapolating the wolf density to all of Unit 24 results in an estimate of 368 total wolves. Unit 25 is 53,220 square miles. Extrapolating the density of wolves from Unit 24 to Unit 25 produces an estimate of 750 total wolves. Although extrapolating a single density estimate to all of Unit 24 and 25 is a coarse approximation, it is based on best available data. This method results in a total combined unit approximation of 1,117 wolves in Unit 24 and 25. With an average harvest of 80 wolves per year in Unit 24 and 25, the harvest rate is 7%.

Wolf pelts are typically not considered ‘prime’ until mid to late December. Trapping wolves in November or October would not produce peak fur quality. Individual variation among hide or fur quality persists throughout winter for wolves. The majority of the annual wolf harvest takes place in January and February when trail quality is high, daylight hours are increasing, and snowpack allows for easy travel by wolves and people.

Extending the season to incorporate October harvest before rivers freeze and before trails are well established would probably not result in a substantial harvest increase. Few wolves are harvested in November because of limited trail access and the focus on early season marten trapping. The department expects little if any increase in harvest if the wolf trapping season were extended by one month. A small increase in harvest would have no observable biological effect on the wolf population.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this season extension for wolves in units 24 and 25A, 25B, and 25C because the expected minimal harvest increase from

the early season extension will have no biological effect on the wolf population in these units. The wolf hunting season in Units 24 and 25 opens August 1 and little harvest occurs between August 1 and October 31. The department also supports alignment of trapping seasons where biologically appropriate to reduce regulatory complexity for trappers.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 150 – 5 AAC 85.056 (2).** Extend the wolf hunting season in Units 24 and 25 from Aug 1 – Apr 30 to Aug 1 – June 15.

**PROPOSED BY:** Luke Tyrrell

**WHAT WOULD THE PROPOSAL DO?** This proposal would extend the wolf hunting season in Units 24 and 25 by six weeks from Aug 1 – Apr 30 to Aug 1 – June 15.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
5 AAC 85.056		
...		
(2)		
...		
Units 12, 20, and 25(C)		
10 Wolves as follows:		
Units 12, remainder of 20 and, 25(C)	Aug 1 – Apr 30	Aug 1 – Apr 30
...		
Units 21 and 24	Aug 1 – Apr 30	Aug 1 – Apr 30
10 Wolves		
Units 25(A), 25(B), 25(D)	Aug 1 – Apr 30	Aug 1 – Apr 30
10 Wolves		

The board has made a positive customary and traditional use finding for wolves in Units 24 and 25 (5 AAC 99.025(11)). The amount reasonably necessary for subsistence uses in Units 24 and 25 is 90% of the harvestable portion of the population.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted the wolf hunting season in Units 24 and 25 would go from Aug 1 – Apr 30 to Aug 1 – June 15, which would add an additional 45 days to the hunting season. If adopted, little if any increase in additional wolf harvest is expected with no anticipated biological concerns.

**BACKGROUND:** Average annual wolf harvest from ground shooting methods in Units 24 and 25 combined is 30 wolves per year (regulatory years (RY)12–22). Average annual wolf harvest in the month of April, from ground shooting methods, in Units 24 and 25 combined is one wolf per year. The small proportion of the harvest that took place in April is probably related to poor pelt quality, poor access due to spring snow conditions, and the prioritization of other outdoor spring activities.

The 2018 wolf management report and plan for Units 24 identified 14.1 wolves per 1000 square miles. This density estimate was the result of multiple years of minimum wolf counts (MWC). Unit 24 is 26,068 square miles. Extrapolating the wolf density to all of Unit 24 results in an estimate of 368 total wolves. Unit 25 is 53,220 square miles. Extrapolating the density of wolves from Unit 24 to Unit 25 produces an estimate of 750 total wolves. Although extrapolating a single density estimate to all of Units 24 and 25 is a coarse approximation, it is based on best available data. This method results in a total combined unit approximation of 1,117 wolves in Units 24 and 25. With an average harvest of 30 wolves per year in Units 24 and 25, the harvest rate is 3%. Harvesting wolves at 3% is likely compensatory mortality and of no biological concern.

Extending the wolf hunting season into May and June will likely yield a similar harvest to that in April (one wolf per year). Wolf abundance, as indicated by harvest record, appears to be stable. The department expects little if any increase in harvest if the wolf hunting season were extended by one month. A small increase in harvest would have no observable biological effect on the wolf population.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal, because increasing the season length would likely not have a biological effect on wolves and there are no population-level conservation concerns. Any time seasons are extended into late May and June there is the potential to harvest lactating females with dependent young.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 151 – 5 AAC 85.056(a)(2) Hunting seasons and bag limits for wolf.** Increase the hunting bag limit for wolves and lengthen the season from Aug 1 – Apr 30 to Aug 1 – Jun 30 in GMU 24 and 25.

**PROPOSED BY:** Jonah Stewart

**WHAT WOULD THE PROPOSAL DO?** This proposal would increase the hunting bag limit for wolves in Units 24 and 25 from 10 wolves to an unknown number of wolves per year. This proposal would also lengthen the wolf hunting season from Aug 1 – Apr 30 to Aug 1 – Jun 30.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
5 AAC 85.056		
...		
(2)		
...		
Units 12, 20, and 25(C)		
10 Wolves as follows:		
Units 12, remainder of 20 and, 25(C)	Aug 1 – Apr 30	Aug 1 – Apr 30
...		
Units 21 and 24	Aug 1 – Apr 30	Aug 1 – Apr 30
10 Wolves		
Units 25(A), 25(B), 25(D)	Aug 1 – Apr 30	Aug 1 – Apr 30
10 Wolves		

The board has made a positive customary and traditional use finding for wolves in Units 24 and 25 (5 AAC 99.025(11)). The amount reasonably necessary for subsistence uses in Units 24 and 25 is 90% of the harvestable portion of the population.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted the wolf hunting bag limit in Units 24 and 25 would change from 10 wolves per year to an undefined number of wolves per year, potentially providing additional opportunity to harvest wolves. The season would also be extended by 60 additional days in the spring.

**BACKGROUND:** Average annual wolf harvest from ground shooting methods in Units 24 and 25 is 30 wolves per regulatory year ((RY)12–22). Over the past 10 regulatory years, the number of individual hunters who killed 10 wolves with ground shooting methods in Units 24 and 25

was one individual (RY12–RY22). The minimal proportion of individuals that took advantage of the full bag limit is probably related to the difficulty of hunting wolves with firearms. Average annual wolf harvest in the month of April from ground shooting methods in Units 24 and 25 combined is one wolf per year. The small proportion of the harvest that took place in April is probably related to poor pelt quality, poor access due to spring snow conditions, and the prioritization of other outdoor spring activities. Extending the wolf hunting season into May and June would likely yield a similar average harvest to that of April (one wolf per year). Wolf abundance, as indicated by harvest records, appears to be stable. The department expects little if any increase in harvest if the wolf hunting season is extended by two months. A small increase in harvest will have no observable biological effect on the wolf population. Harvest of wolves in late May or June could target lactating females with dependent young reducing localized wolf recruitment. Harvesting wolves without the value of fur does not support consumptive use.

The 2018 wolf management report and plan for Unit 24 identified 14 wolves per 1000 square miles. This density estimate was the result of multiple years of minimum wolf counts (MWC). Unit 24 is 26,068 square miles. Extrapolating the wolf density to all of Unit 24 results in an estimate of 368 total wolves. Unit 25 is 53,220 square miles. Extrapolating the density of wolves from Unit 24 to Unit 25 produces an estimate of 750 total wolves. Although extrapolating a single density estimate to all of Units 24 and 25 is a coarse approximation, it is based on the best available information. Combined, this method results in a total approximation of 1,117 wolves in Units 24 and 25, combined. With an average harvest of 30 wolves per year in Units 24 and 25, the harvest rate is 3%. Harvesting wolves at 3% is likely compensatory mortality and of no biological concern.

Extending the wolf hunting season into May and June will likely yield a similar harvest as April (1 wolf per year). Wolf abundance, as indicated by harvest record, appears to be stable. The department expects little if any increase in harvest if the wolf hunting season were extended by one month. A small increase in harvest will have no observable biological effect on the wolf population. Pregnant female wolves generally begin denning and give birth to pups in early to mid-May in interior Alaska. Following birth, the female generally remains close to the den, but average daily distance from the den increases in late May and June, which could increase the likelihood of harvest of lactating females with dependent young.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal to increase the season length. Although the number of wolves for the proposed increased bag limit is unspecified, increasing the bag limit would likely have no biological effect because few wolves are harvested during the hunting season and the bag limit is rarely reached under the current regulations which limits harvest to 10 wolves per year. Any time seasons are extended into late May and June there is the potential to harvest lactating females with dependent young.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 152 – 5 AAC 85.020 (22) and 5 AAC 92.044 (b) (1). Increase bag limit for brown bears in Unit 24C and 24D and allow for fall baiting of black and brown bears in Units 21B and 24B. Align bag limit and fall baiting in portions of Units 21 and 24.**

**PROPOSED BY:** Koyukuk River Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal will: 1) increase the bag limit to two brown bears in Units 24C and 24D and, 2) allow for fall baiting of black and brown bears in Units 21B and 24B.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
5 AAC 85.020		
(22)		
...		
Units 24(C) and 24(D)		
RESIDENT HUNTERS:		
1 bear every regulatory year, by registration permit only; or	Aug. 10 – June 30 (Subsistence hunt only)	No Open Season
1 bear every regulatory year,	Aug. 10 – June 30	
NONRESIDENT HUNTERS:		
1 bear every regulatory year, ...		Aug. 10 – June 30
5 AAC 92.044		
...		
(b)		
...		
(1) a person may establish a black bear bait station, or a black and brown bear bait station in Units 7, 11, 12, 13, 14(A), 14(B), that portion of the remainder of 14(C), excluding		

- Glacier Creek drainage outside of Chugach State Park, 15, 16, 18, 19(A), 19(D), 20(A), 20(B), 20(C),  
(2) that portion of 20(D) north of the Tanana River, 20(E), 20(F), 21(C), 21(D), 23, 24(C), 24(D), 25(C), and 25(D), only if that person obtains a permit under this section:

No resident locking tag is required, and all bears harvested must be sealed.

The board established a positive customary and traditional use (C&T) finding for black bears in Units 21 and 24 but chose not to establish an ANS until a better harvest record is established. The board established a positive C&T finding for brown bears in Units 21 and 22 with an ANS of 20-25; and a positive C&T finding for brown bears in Units 23, 24, and 26 with an ANS of 25-35.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adoption of this proposal will increase the bag limit from 1 brown bear to 2 brown bears in Units 24C and 24D and allow for fall baiting of black and brown bears in Units 21B and 24B. This proposal will align the bear regulations with the bag limits, and baiting seasons in adjacent GMUs. Recent season and bag limit changes in adjacent GMUs that increased opportunity, did not result in increased harvest, however additional harvestable surplus exists. The effect of this proposal will be to provide additional opportunity and simplify existing regulations. It would allow for the sale of hides and skulls of brown bears with the increased bag limit.

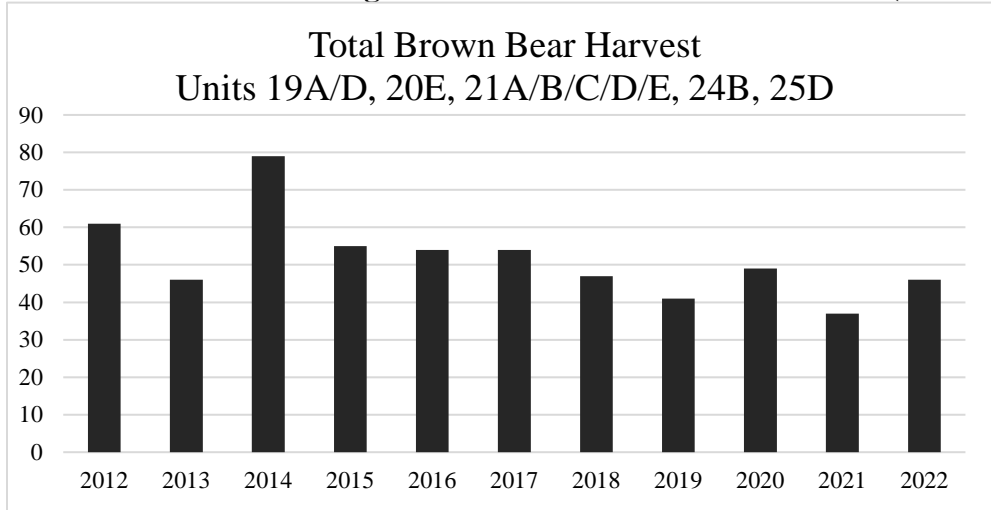
**BACKGROUND:** The management objective for Unit 24 is to manage a brown bear population that will sustain a 3-year mean reported harvest of at least 20 bears in the northern portion of the unit (north of Allakaket) and at least 15 bears in the southern (remaining portion) part of the unit, with at least 50% males reported in the harvest. The average reported harvest for the northern portion of the unit during RY20–RY22 was 9.3 bears (71% male) and for the southern portion, the reported harvest was 1.6 bears (60 % male). The 5-yr average harvest of brown bears taken over bait was 0.4 bears/year in Unit 24 and 1.2 bears/year in Units 21B, C, and D combined.

The 20-year trend in the harvest data indicated that harvest in the Galena Area was stable even though bag limits, seasons lengths, and methods were changed several times during that time period to provide additional hunting opportunity. Males were harvested at a higher rate than females and average ages of the harvested bears remained stable indicating that the population in the Galena Area was not over harvested.

In Region III, bag limits of 2 brown bears occur in Units 19A, 19D, 20E, 21A, 21B, 21C, 21D, 21E, 24B, 25D. Additionally, fall and spring brown bear baiting in Region III is allowed in Units 19A, 19D, 20A, 20B, 20C, 20D, 20E, 20F, 21C, 21D, 24C, 24D, 25C, and 25D. Since RY12, seventeen of 551 hunters (3.1%) harvested more than one brown bear in those units with >1 bear bag limit. However, total bear harvest for those combined units with >1 bear bag limit was relatively stable during that period (Figure 1).



**Figure 1. Combined annual harvest of brown bears for Game Management Units in Region III with >1 brown bear bag limit or fall brown bear bait seasons (RY12-RY22).**



The department estimated a population of 450 bears in northern Unit 24 (north of Allakaket) and 320–480 in the remainder of the Unit (south of Allakaket), based on extrapolated densities of similar habitats from other surveys. Based on estimated sustainable harvest rate of 5–6% in Unit 24, a minimum annual harvest of 39–56 bears can be sustained for all of Unit 24. The 10-yr average harvest (RY13–RY22) was 13.4 bears/year in Unit 24 combined. With the current conservative population estimate of 350–400 bears in Units 21B, C, and D, a sustainable annual harvest of at least 18–24 brown bears can be supported (5–6% of the population). The 10-yr average harvest (RY13–RY22) was 11.4 bears/year in Unit 21B, C, D combined. Based on harvest history where a 2-bear bag limit or fall bear baiting occurs in Region III, harvest is not anticipated to increase or exceed the harvestable surplus in any of the proposed Units (21B, 24B, 24C, or 24D).

Black bears are abundant throughout the Galena Management Area and harvested at low levels. There are no biological concerns regarding a fall baiting opportunity, and additional harvest is expected to be negligible in Units 21B and 24B.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal to align regulations in the Galena Management Area game management units and does not have any biological concerns with brown bear populations or harvest in Unit 21B, 24B, 24C or 24D resulting from increased bag limit or a fall baiting opportunity for brown bears or black bears.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 153 – 5 AAC 84.270 (14), and 85.057 Extend the Wolverine hunting and trapping seasons in Unit 21 to end on April 30.** Wolverine trapping season would extend from Nov 1 – Mar 31 to **Nov 1 – April 30**. Wolverine hunting season would extend from Sept 1 – Mar 31 to **Sept 1 – April 30**.

**PROPOSED BY:** Gilbert Huntington

**WHAT WOULD THE PROPOSAL DO?** This proposal would extend the hunting and trapping seasons for Wolverine in Unit 21 by an additional month. This proposal seeks to extend the wolverine trapping season from Nov 1 – Mar 31 to **Nov 1 – April 30**. Wolverine hunting season would extend from Sept 1 – Mar 31 to **Sept 1 – April 30**.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Units</b>	<b>Open Season</b>	<b>Bag Limit</b>
5 AAC 84.270		
...		
(14)		
...		
Units 19, remainder of 20(C), 21, 24, and 25 (except 25C))	Nov 1 – Mar 31	No Limit.
	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<b>Units and Bag Limits</b>		
5 AAC 85.057		
...		
Units 6–10, 12, 15, 16(B), 17, and 19–25, and 26(A) 1 Wolverine	Sept 1 – Mar 31	Sept 1 – Mar 31

The board has made a positive customary and traditional use finding for wolverines in all game management units with a harvestable portion of the population (5 AAC 99.025(13)). The amount necessary for subsistence is 90 percent of the harvestable portion of the population.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, the hunting and trapping season for wolverine would extend 1 month in GMU 21. Wolverine trapping season would change from Nov 1 – Mar 31 to **Nov 1 – April 30**. Wolverine hunting season would extend from Sept 1 – Mar 31 to **Sept 1 – April 30**. These

season extensions would add an additional 30 days for wolverine trapping and hunting during the spring.

**BACKGROUND:** The annual average reported wolverine harvest through the sealing process during RY12-RY22 was 30 wolverines in Unit 21. However, there may be small additional harvest of wolverine that are not sealed. The bag limit to harvest a wolverine with a hunting license is one wolverine per regulatory year. However, there is no bag limit for wolverines under trapping regulations, for which both traps and firearms may be used.

The 2017 furbearer management report for Units 21B, 21C, 21D, and 24 identified wolverine harvest as consistent with historical harvest. The annual average reported wolverine harvest through the sealing process during RY83-RY22 was 31 wolverines per year in Unit 21. The annual average reported wolverine harvest through the sealing process during RY12-RY22 was 30 wolverines in Unit 21. Wolverine harvest has remained consistent over time, the department believes that harvest is likely compensatory and sustainable. January and February are consistently the months with the highest percentage of the total wolverine harvest. Extending the hunting and trapping season for wolverine is unlikely to substantially increase the harvest in Unit 21. However, an additional month would provide wolverine harvest opportunities when females are becoming more vulnerable to harvest.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal and there are no biological concerns. Harvesting in April could result in the take of lactating females, but harvest effort is likely to remain low and sustainable.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposal 154

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**PROPOSAL 155 – 5 AAC 85.025. Hunting seasons and bag limit for caribou.** Increase the caribou bag limit for residents in Unit 26B remainder.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** This proposal would increase the resident bag limit to 5 caribou in Unit 26B Remainder.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are:

Unit/Area	Bag Limit	Open season (Permit/Hunt#)
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		Resident	Nonresident
Unit 26B - northwest portion	5 caribou per day	bulls	no closed season (harvest ticket)
		cows	1 July–15 May (harvest ticket)
	One bull		1 August–15 September (harvest ticket)
Unit 26B - Remainder	4 bulls	1 July–30 April (harvest ticket)	
	One bull		1 August–15 September (harvest ticket)

There is a positive Intensive Management finding for the Central Arctic Herd (CAH) and a population objective of 28,000 – 32,000 and a harvest objective of 1,400 – 1,600.

There is a positive customary and traditional use finding for the CAH and an ANS of 250-450 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would increase the resident hunting quota for the Central Arctic caribou in Unit 26B remainder from 4 bulls to 5 caribou of either sex.

The proposed changes are (deletions are struck through and additions are in bold and underlined):

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - northwest portion	5 caribou per day	bulls	no closed season (harvest ticket)
		cows	1 July–15 May (harvest ticket)
	One bull		1 August–15 September (harvest ticket)
Unit 26B - Remainder	<del>4 bulls</del> <b><u>5 caribou</u></b>	1 July–30 April (harvest ticket)	
	One bull		1 August–15 September (harvest ticket)

**BACKGROUND:** The CAH population has been steadily increasing from a low in 2016 of 22,630 (95% C.I. = 20,074–25,186). The population is currently estimated at 34,642 (95% C.I. = 32,419–36,866) individuals as of the 2022 photocensus. This is above the intensive management population objective of 28,000–32,000 caribou and biological data suggests the population is stable to slightly increasing based on high calving rates (83% average parturient rate from 2019 - 2023), early calf survival rates (84% in 2023), as well as high annual adult survival (88% of collared individuals survived from July 2022 – July 2023).

Since the CAH is above the management objective, this herd could be harvested at 5% (1% of which could be cows), therefore there is a harvestable surplus of around 1,400 caribou of which about 350 of those could be cows. Based on harvest records, the harvest limit of 1,400 caribou has not been met in the last five years (annual harvest average = 420 caribou (range = 225 – 615) between 2018 to 2022)., While Porcupine caribou occasionally occupy Unit 26B, caribou in the unit during hunting season are almost exclusively CAH.

From 2018 – 2022, there has been an annual average of 411 (range = 305–549; Table 1) resident and 343 (range = 205–569; Table 1) nonresident hunters that participate annually in the 26B caribou general harvest.

Table 1: Central Arctic caribou hunter statistics in 26B from 2018 to 2022 by Alaska residency, successful or unsuccessful hunts, and number of caribou harvested. \*One illegal take of a caribou by a non-resident was reported in 2022.

Year	Resident Hunters			Non-resident Hunters		
	Successful	Unsuccessful	Harvest	Successful	Unsuccessful	Harvest
2018	104	201	120	105	100	105
2019	117	203	139	161	107	161
2020	210	225	274	154	53	154
2021	189	258	243	289	175	289
2022	211	338	264	350	219	351*

\*One illegal take of a caribou by a non-resident was reported in 2022.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** the proposal to increase the resident bag limit as it increases harvest opportunity of a harvestable surplus. However, the department is neutral on any allocation between resident and nonresident hunters.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 156 – 5 AAC 85.025 (21). Hunting seasons and bag limit for caribou.** Change the nonresident caribou hunt in Unit 26B remainder to a drawing hunt or registration hunt with a limited number of permits available.

**PROPOSED BY:** Kenneth Bowman

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the nonresident caribou hunt in 26B Remainder to a draw only or registration hunt.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are:

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - northwest portion	5 caribou per day	bulls	no closed season (harvest ticket)
		cows	1 July–15 May (harvest ticket)
	One bull		1 August–15 September (harvest ticket)
Unit 26B – Remainder	4 bulls	1 July–30 April (harvest ticket)	
	One bull		1 August–15 September (harvest ticket)

There is a positive Intensive Management finding for the Central Arctic Herd (CAH) and a population objective of 28,000 – 32,000 and a harvest objective of 1,400 – 1,600.

There is a positive customary and traditional use finding for the CAH and an ANS of 250-450 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted the proposal would change the nonresident caribou hunt from a harvest ticket to a registration or drawing hunt with the intension to limit the number of nonresident hunters in the area.

The proposed changes are (deletions are struck through and additions are in bold and underlined):

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - northwest portion	5 caribou per day	bulls	no closed season (harvest ticket)

	cows	1 July–15 May (harvest ticket)	
One bull			1 August–15 September (harvest ticket)
4 bulls		1 July–30 April (harvest ticket)	
One bull			1 August–15 September (harvest ticket <u>Draw or registration permit</u> )
Unit 26B - Remainder			

**BACKGROUND:** The CAH population has been steadily increasing since a low in 2016 of 22,630 (95% C.I. = 20,074–25,186). The population is currently estimated at 34,642 (95% C.I. = 32,419–36,866) individuals as of the 2022 photocensus. This is above the intensive management population objective of 28,000–32,000 caribou and biological data suggests the population is stable to slightly increasing based on high calving rates (83% average parturient rate from 2019 - 2023), early calf survival rates (84% in 2023), as well as high annual adult survival (88% of collared individuals survived from July 2022 – July 2023).

Since the CAH is above the management objective, this herd could be harvested at 5% (1% of which could be cows), therefore there is a harvestable surplus of around 1,400 caribou of which about 350 of those could be cows. Based on harvest records, the harvest limit of 1,400 caribou has not been met in the last five years (annual harvest average = 420 caribou (range = 225 – 615) between 2018 to 2022), indicating that the harvestable surplus is not being fully realized. While porcupine caribou occasionally occupy Unit 26B, caribou in the unit during hunting season are almost exclusively CAH.

From 2018 – 2022, there have been an annual average of 411 (range = 305–549; Table 1) resident and 343 (range = 205–569; Table 1) nonresident hunters that participate annually in the 26B caribou general harvest.

Table 1: Central Arctic caribou hunter statistics in 26B from 2018 to 2022 by Alaska residency, successful or unsuccessful hunt, and number of caribou harvested.

Year	Resident Hunters			Non-resident Hunters		
	Successful	Unsuccessful	Harvest	Successful	Unsuccessful	Harvest
2018	104	201	120	105	100	105
2019	117	203	139	161	107	161
2020	210	225	274	154	53	154
2021	189	258	243	289	175	289
2022	211	338	264	350	219	351*

\*One illegal caribou was reported in 2022 by a non-resident.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of the harvestable surplus. Since the CAH is above the management population objective, the department supports increased opportunity to utilize the harvestable surplus. The proponent does not specify how many non-resident drawing or registration permits would be issued. If the board wishes to adopt this proposal, the department requests guidance from the Board on the number of non-resident permits to be issued. The proponent’s primary concerns are overcrowding and hunt quality.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 157– 5 AAC 85.050(3) Hunting seasons and bag limits for muskoxen.**  
Change the Unit 26A and 26B Tier II permit hunt area boundaries.

**PROPOSED BY:** North Slope Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** If adopted, this proposal would change the Unit 26A and 26B muskoxen hunt area boundary to match the federal muskox and moose hunt boundaries and expand the state TX109 and TX108 hunt areas.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Unit and location</b>	<b>Resident open season</b>	<b>Nonresident open season</b>
Units 26A, that portion west of the Topagoruk River following 156° W. Long. South to the Unit 26A border		
1 muskoxen by Tier II subsistence permit (TX109) only; up to 15 muskoxen may be taken	Aug. 1–Mar. 15 (Subsistence hunt only)	No open season
Units 26A that portion east of the Topagoruk River following 156° W. Long. South to the Unit 26A border, and 26B that portion west of the Dalton Highway		
1 muskoxen by Tier II subsistence permit (TX108) only; up to 20 muskoxen may be taken ( <i>Permits were issued for east of longitude 153 and west of DHCMA</i> )	Aug. 1–Mar. 31 (Subsistence hunt only)	No open season



<b>Unit and location</b>	<b>Resident open season</b>	<b>Nonresident open season</b>
Unit 26B, that portion east of the Dalton Highway		
1 muskoxen by Tier I permit only <i>(Permits were issued east of the DHCMA)</i>	Season to be announced (Subsistence hunt only)	No open season
Or		
1 bull by drawing permit only if the harvestable surplus is greater than 4 muskoxen; up to 5 muskoxen may be taken	Sept. 20–Oct. 10 Mar 10–Mar. 30	No open season

There is a positive customary and traditional use finding (C&T) for muskoxen in Unit 23, that portion north and west of the Kobuk River drainage, and that portion of Unit 26A west of the Topagoruk River following 156°00' W longitude South to the Unit 26A border (the Cape Thompson population) with an Amounts Reasonably Necessary for Subsistence (ANS) range of 18-22 animals.

There is a positive C&T finding for muskoxen in Unit 26A that portion east of the Topagoruk River following 156°00' W longitude South to the Unit 26A border, and Unit 26B, that portion west of the Dalton Highway Corridor with an ANS of 20 muskoxen.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The effect of this proposal would be to align federal and state hunt boundaries and eliminate a gap between current muskoxen hunt zones with no muskoxen hunts that currently exists between the two state tier II hunt areas. The effect would also expand the two state hunt areas. The new language for each hunt area would be:

TX108 - Unit 26A East and 26B West, that portion from West of the Dalton Highway to the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155°00' W longitude south to the Unit 26A border.

TX109 – Unit 26A, that portion west of the eastern shore of Admiralty Bay where the Alaktak River drains, following the Alaktak River to 155°00' W longitude south to the Units 26A border

The federal boundary is as follows: Unit 26A, that portion west of the eastern shore of Admiralty Bay where the Alaktak River drains, following the Alaktak River to 155°00' W longitude south to the Units 26A border

**BACKGROUND:** Muskoxen were reintroduced to the North Slope in 1969 and again in 1970 and the population increased through mid-1990s to a high of 500–650 muskoxen in Units 26B and 26C. The population then declined and by 2004 had fallen below the management objective of 300 muskoxen and the hunts were cancelled. Since 2004, the population stabilized and then began to slowly grow and by 2018 was just barely above the 300 muskoxen objective. Since 2018, the population has continued to grow slowly and has remained above the population objective at 340-380 muskoxen. Starting in RY23 the hunt was reinstated for the first time since 2004 and the same hunt structure from 2004 was implemented. This included four Tier II permits, four registration subsistence permits, and four resident only drawing permits.

Muskoxen were also introduced to Unit 23, now referred to as the Cape Thompson population in 1970. Since then, the population has grown and expanded its range from the Cape Krusenstern core area in Unit 23 into Unit 26A with now periodic sightings of muskoxen in Wainwright, Point Lay, and Atqasuk. The Cape Thompson muskoxen population within the core area grew approximately 8% annually between their reintroduction in 1970 through 1998. Population growth within the core area slowed to 2% annually between 1998–2005 (Dau 2005, Hughes 2015) and decreased annually between 2005–2018. However, the core Cape Thompson muskoxen population increased 59% between 2018–2019. The population wide estimate has grown from 556 muskoxen to 911 muskoxen between 2016 and 2020 respectively. The 2020 Cape Thompson survey estimated 455 muskoxen in 26A with 95% CI (350-631).

In 2022, the BOG adopted a proposal to open the Western portion of 26A to a Tier II hunt TX109. The first-Tier II drawing for the TX109 permit was held in the fall of 2022 and the first season of the TX109 was August 1, 2023-March 15, 2024. A federal muskoxen permit was established for hunting muskoxen in the summer of 2022 and there was an open season for six permits issued through a lottery system. One muskoxen was taken under the new federal permit during the 2022 season. In 2023, three permits were issued under the TX109 Tier II draw, and 3 permits were issued under the federal hunt which is administered by BLM.

The muskoxen that have been taken in Western 26A were taken as incidental or stranded animals under 5AAC 92.046. From 1998–2020, 22 muskoxen were harvested.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal to alleviate hunter confusion and to increase hunt area and opportunity by aligning state and federal hunt boundaries and there are no biological concerns associated with the boundary change. Adoption of the proposal will cause hunt area boundaries to be misaligned with existing customary and traditional use determination areas in 5 AAC 99.025, and the department recommends the board amend the proposal to align those boundaries with the hunt area.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 163**– 5 AAC 92.220 Salvage of game meat, furs, and hides. Align salvage requirements for caribou in Units 25B, 25C, and 25D with Unit 25A.

**PROPOSED BY:** Amanda Pope

**WHAT WOULD THE PROPOSAL DO?** This proposal would align salvage requirements for caribou in all of Unit 25 with the current requirements in Unit 25A. The current regulation in Unit 25A for caribou taken before October 1 requires the edible meat of the front quarters, hindquarters, and ribs to remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption.

**WHAT ARE THE CURRENT REGULATIONS?**

5 AAC 92.220 (d) – A person taking game not listed in (a) of this section shall salvage for human consumption all edible meat, as defined in 5 AAC 92.990. In addition,

5 AAC 92.220 (3) – for moose taken before October 1 in Units 13, 19, 21, 23, 24, and 25 for caribou taken before October 1 in Units 13, 19, 21(A), 21(E), 23, 24, and 25(A), and for bison taken before October 1 in Units 19, 21(A), and 21(E), the edible meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption;

5 AAC 92.990 (26) – “edible meat” means in the case of a big game animal, except a bear, the meat of the ribs, neck, brisket, front quarters, hindquarters, and the meat along the backbone between the front and hindquarters;.....however, “edible meat” of big game or small game birds does not include the meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably lost as a result of boning or a close trimming of the bones, or viscera.

There is a positive customary and traditional use (C&T) finding for the Porcupine caribou herd in units 25(A), (B), and (D). The amount reasonably necessary for subsistence (ANS) for this herd is 1,250 to 1,550 caribou. There is a positive C&T finding for the Fortymile caribou herd in Unit 25(C), outside the Fairbanks nonsubsistence area. The ANS for this herd is 350 to 400 caribou.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, hunters taking caribou in Units 25B, 25C, and 25D prior to October 1 would be required to leave the edible meat of all four quarters and the ribs attached to the bone until the meat has been transported from the field or is processed for human consumption. If

adopted, this proposal may result in logistical challenges and increased monetary expenditures to remove the meat and bones from the field.

**BACKGROUND:** Meat on bone requirements have been irregularly applied across Alaska for moose, caribou, and bison. Leaving the meat on the bone can aid in slowing the decomposition of meat prolonging the time it can be in the field before processing and provide some rigidity to the quarters that helps when handling. Downsides to leaving the meat on the bone include carrying out the extra weight of the bones and difficulty fitting it into airplanes and other small spaces for transportation.

Unless required by regulation, meat care is the responsibility of the hunter. Regardless of the method (bone in vs. bone out) used, the hunter is responsible for properly caring for their meat and may risk committing the class A misdemeanor of wanton waste of big game animals (Sec. 16.30.010) if the edible meat is not salvaged for human consumption.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because there are no biological concerns with the proposed change.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 164

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**PROPOSAL 165 – 5 AAC 92.039. Permit for taking wolves using aircraft.** Create an intensive management plan for moose in Unit 25D that would allow wolves to be taken on the same day the hunter was airborne by landing and shooting.

**PROPOSED BY:** Yukon Flats Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would create an intensive management (IM) plan for moose in Unit 25D that would allow wolves to be taken on the same day the hunter has flown or same day airborne (SDA).

**WHAT ARE THE CURRENT REGULATIONS?** The proponent is seeking to take wolves SDA by permit under authority of the following:

**5 AAAC 92.039 (a) Permit for taking wolves using aircraft.** a person may not use an aircraft to land and shoot a wolf without first obtaining a permit from the department.

However, typically a predator control program must be associated with an IM plan for a prey species that is identified under 5 AAC 92.108 as important for providing high levels of harvest for human consumption.

**5 AAC 92.108. Identified big game prey populations and objectives.** Moose in Unit 25D has a positive IM finding, a population objective of 15,000 moose, and a harvest objective of 600–1500 moose.

With a positive IM finding, moose in Unit 25D are eligible for an intensive management program under AS 16.05.255.

AS 16.05.255 (e) states that the Board of Game “shall adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals....”

However, AS 16.05.255 (f) states that “... This subsection does not apply if the board  
(1) Determines that intensive management would be (A) ineffective based on scientific information; (B) inappropriate due to land ownership patterns; or (C) against the best interest of subsistence uses.”

Other regulations pertaining to taking wolves are found in:

AS 16.05.783 (a) which states that “a person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne.” However, the Board of Game may authorize a predator control program that allows airborne or same day airborne shooting under conditions laid out in the statute.

**5 AAC 92.085 (8). Unlawful methods of taking big game.** This regulation prohibits the taking or assisting in taking of big game until after 3:00 a.m. following the day in which the flying occurred. The exceptions to this regulation include a person flying on a regularly scheduled commercial airline, including a commuter airline.

**5 AAC 92.095 (8). Unlawful methods of taking furbearers.** This regulation prohibits a person from taking or assisting in the taking of wolf and wolverine until after 3:00 a.m. following the day in which the flying occurred. The regulation also prohibits the taking of coyote, Arctic fox, or lynx unless that person is over 300 feet from the airplane at the time of take.

**5AAC 92.990 (5). Definitions.** This regulation defines “big game” as black bear, brown bear, bison, caribou, Sitka black-tailed deer, elk, mountain goat, moose, muskox, Dall sheep, wolf, and wolverine.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** An intensive management plan for moose in Unit 25D would be adopted. The department would then need to conduct a feasibility assessment and operational plan for the board to review.

**BACKGROUND:** In March 2006 the board requested that the department develop an IM plan for moose in the Yukon Flats in Unit 25D in response to public proposals that requested predator control for wolves and bears to reduce predation on moose. In March 2008, the department presented IM options to the board that explored a wide spectrum of management options to increase moose abundance in the Yukon Flats. The presentation acknowledged the difficulty of implementing broad scale predator control on U.S. Fish and Wildlife Service (USFWS) lands and focused on the feasibility of increased wolf and bear harvest on smaller private lands surrounding communities to increase moose survival.

From 2008 to 2011, the department conducted an IM feasibility assessment to evaluate the efficacy of implementing an IM plan in a 530 mi<sup>2</sup> area surrounding the community of Beaver in Unit 25D. The assessment used data from existing monitoring programs conducted by the department and the USFWS and results from the implementation of new programs in coordination with or conducted by the Beaver Tribal Council and the Council of Athabaskan Tribal Governments. The assessment evaluated predator control methods to decrease the number of wolves as well as the effects of providing hunting and trapping opportunities for people to reduce wolf and bear populations independently.

In March 2012, the department presented the results of the IM feasibility assessment to the Board. Our evaluation indicated that a community-based IM program in Unit 25D was not feasible. Black bear abundance is very high and local efforts to reduce abundance through additional opportunity were not reasonably achievable. Efforts by local communities to provide financial incentives to trap wolves did not result in increased harvest. Department or public-conducted predation control programs were also not feasible in Unit 25D because predation control is not generally permitted on federal land, which accounts for 65% lands in Unit 25D. The remaining 35% of land in Unit 25D is not contiguous or large enough to implement a predator control program that will reasonably influence moose populations. Based on the results of the IM feasibility assessment, the Board and the department did not implement an IM plan or predator control plan for Unit 25D in 2012. The same restraints and challenges exist today.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal because land ownership in 25D has not changed and the results of the feasibility assessment conducted during 2008–2011, which indicate control is not feasible, are still valid.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposal 166

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**PROPOSAL 167 – 5 AAC 85.020(24) Hunting seasons and bag limits for brown bear.**

Lengthen the season dates for Unit 26B nonresident drawing brown bear hunt DB987.

**PROPOSED BY:** Emily Thoft

**WHAT WOULD THE PROPOSAL DO?** Lengthen the nonresident brown bear season in 26B (DB987) by 15 days opening on August 10<sup>th</sup> instead of August 25<sup>th</sup>.

**WHAT ARE THE CURRENT REGULATIONS?**

The current brown bear seasons in unit 26B:

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - within Dalton Highway Corridor Management Area	One bear every regulatory year	Aug 10-Dec 31 (RB988)	
		Jan 1 – May 31 (RB989).	
	One bear every regulatory year		Aug 25 – May 31 (DB987)
Unit 26B - Remainder	One bear every regulatory year	Aug 25 – Dec 31 (RB988).	
		Jan 1 – May 31 (RB989)	
	One bear ever regulatory year		Aug 25 – May 31 (DB987)

The department can issue up to 20 permits to nonresidents for all of Unit 26B combined.

Alaska Statutes require nonresident hunters to be accompanied by an Alaska licensed guide or by a resident relative within second-degree of kindred. All brown bears taken in Unit 26B must be sealed, and the take of cubs and sows with cubs is prohibited.

The Board previously found a positive customary and traditional determination for brown bears in Unit 26, and also established a combined ANS for brown bears in Units 23, 24 and 26, of 25-35 animals.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would lengthen the nonresident drawing permit brown bear season in 26B by opening two weeks earlier.

The proposed changes are (deletions are struck through and additions are in bold and underlined):

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - within Dalton Highway Corridor Management Area	One bear every regulatory year	Aug 10-Dec 31 (RB988)	
		Jan 1 – May 31 (RB989).	
	One bear every regulatory year		<del>Aug 10</del> -Aug 25 – May 31 (DB987)
Unit 26B - Remainder	One bear every regulatory year	Aug 25 – Dec 31 (RB988).	
		Jan 1 – May 31 (RB989)	
	One bear ever regulatory year		<del>Aug 10</del> -Aug 25 – May 31 (DB987)

**BACKGROUND:** The management objectives for brown bears in Unit 26B include managing for a 3-year mean annual human-caused brown bear mortality of  $\leq 27$  bears  $\geq 2$ -years old of which no more than 12 are female. This management goal allows a human-caused mortality rate of  $\leq 8\%$  of the brown bear population in the area, which was estimated to be 243-423 bears in 2003 (Lenart 2021). Although it is unlikely that another brown bear survey will be conducted for this area due to the high cost of such surveys, there are no biological concerns for brown bears in Unit 26B. Over the past 20 years there has been little evidence of habitat degradation in the area and the prey population has remained stable. In fact, the Central Arctic and Porcupine caribou herds, which are the herds in 26B, are currently experiencing a population increase. Additionally, the restriction on harvesting sows with cubs protects adult sows from harvest, thereby protecting brown bear reproduction.

Hunting pressure for brown bears remains low in Unit 26B. The 5-year (RY18-RY22) mean annual harvest from all hunts was 13 bears per year (range = 10-15) of which an average of 4 per year were female (range= 2-8). This is well within the management goal of  $\leq 27$  bears and  $\leq 12$  females. Over the past 5 years (RY18-RY22), there has been an annual average of 81 resident hunters (range = 68 – 104) that report participating in the Fall brown bear season (RB988), with an average harvest of 8 bears per year. In the Spring brown bear season (RB989), the 5-year



annual average was 7 resident hunters (range = 4 - 11) participated and had an average harvest rate of 1 bear per year. For the past 5 years (RY18-RY22), the department has issued between 8 and 15 nonresident permits annually, and an average of 7 nonresident hunters (range = 4-10) participated in the drawing harvest (DB987) with an average harvest of 4 bears per year.

Table 1: Hunter residency and success for brown bear in Unit 26B.

Year	RB988		RB989		DB987	
	Successful	Unsuccessful	Successful	Unsuccessful	Successful	Unsuccessful
2018	12	58	0	4	3	1
2019	4	64	0	11	7	3
2020	7	64	1	7	4	2
2021	10	94	1	5	4	4
2022	6	86	2	5	2	3

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. There is no biological concern with an increase in 15 days by nonresidents. The department can issue up to 20 permits total to nonresidents in all of Unit 26B combined, therefore increasing the season length will not automatically result in additional bears being harvested, as harvest is limited by the number of permits issued.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 168 – 5 AAC 85.020. Hunting seasons and bag limits for Brown Bears**

**PROPOSED BY:** Craig Van Arsdale

**WHAT WOULD THE PROPOSAL DO?**

1. Extend the brown bear Spring season (RB989) to Jan 1 - June 15th in unit 26B within Dalton Highway Corridor Management Area and Unit 26B Remainder.
2. Open the Fall brown bear season (RB988) 15 days earlier to Aug 10- Dec 31 in hunt area 26B Remainder.
3. Change the nonresident draw permit hunt (DB987) to Aug 10-June 15.

**WHAT ARE THE CURRENT REGULATIONS?** The current brown bear seasons in unit 26B are:

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident

Unit 26B - within Dalton Highway Corridor Management Area	One bear every regulatory year	Aug 10-Dec 31 (RB988)	
		Jan 1 – May 31 (RB989).	
	One bear every regulatory year		Aug 25 – May 31 (DB987)
Unit 26B - Remainder	One bear every regulatory year	Aug 25 – Dec 31 (RB988).	
		Jan 1 – May 31 (RB989)	
	One bear ever regulatory year		Aug 25 – May 31 (DB987)

The department can issue up to 20 permits to nonresidents for all of Unit 26B combined.

Alaska Statutes require nonresident hunters to be accompanied by an Alaska licensed guide or by a resident relative within second-degree of kindred. All brown bears taken in Unit 26B must be sealed, and the take of cubs and sows with cubs is prohibited.

The Board previously found a positive customary and traditional determination for brown bears in Unit 26, and also established a combined ANS for brown bears in Units 23, 24 and 26, of 25-35 animals.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

The proposed changes are (deletions are struck through and additions are in bold and underlined):

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - within Dalton Highway Corridor Management Area	One bear every regulatory year	Aug 10-Dec 31 (RB988)	
		Jan 1 – <del>May 31</del> <b><u>June 15</u></b> (RB989).	
	One bear every regulatory year		<b><u>Aug 10</u></b> - <del>Aug 25</del> – May 31 (DB987)
Unit 26B - Remainder	One bear every regulatory year	<b><u>Aug 10</u></b> - <del>Aug 25</del> – Dec 31 (RB988).	
		Jan 1 – <del>May 31</del> <b><u>June 15</u></b> (RB989)	
	One bear ever regulatory year		<b><u>Aug 10</u></b> - <del>Aug 25</del> – May 31 (DB987)

**BACKGROUND:** The management objectives for brown bears in Unit 26B includes managing for a 3-year mean annual human-caused brown bear mortality of  $\leq 27$  bears  $\geq 2$ -years old of which no more than 12 are female. This management goal allows a human-caused mortality rate of  $\leq 8\%$  of the brown bear population in the area, which was estimated to be 243-423 bears in 2003 (Lenart 2021). Although it is unlikely that another brown bear survey will be conducted for this area due to the high cost of such surveys, there are no ecological concerns for brown bears in Unit 26B. Over the past 20 years there has been little evidence of habitat degradation in the area and the prey population has remained stable. In fact, the Central Arctic and Porcupine caribou herds, which are the herds in 26B, are currently experiencing a population increase. Additionally, the restriction on harvesting sows with cubs protects adult sows from harvest, thereby protecting brown bear reproduction.

Hunting pressure for brown bears in Unit 26B remains low. The 5-year (RY18-RY22) mean annual harvest from all hunts was 13 bears per year (range = 10-15) of which an average of 4 per year were female (range= 2-8). This is well within the management goal of  $\leq 27$  bears and  $\leq 12$  females. Over the past 5 years (RY18-RY22), there has been an annual average of 81 resident hunters (range = 68 – 104) that report participating in the Fall brown bear season (RB988), with an average harvest of 8 bears per year. In the Spring brown bear season (RB989), the 5-year annual average was 7 resident hunters (range = 4 - 11) participated and had an average harvest rate of 1 bear per year. For the past 5 years (RY18-RY22), the department has issued between 8 and 15 nonresident permits annually, and an average of 7 nonresident hunters (range = 4-10) participated in the drawing harvest (DB987) with an average harvest of 4 bears per year.

Table 1: Hunter residency and success for brown bear in Unit 26B.

Year	RB988		RB989		DB987	
	Successful	Unsuccessful	Successful	Unsuccessful	Successful	Unsuccessful
2018	12	58	0	4	3	1
2019	4	64	0	11	7	3
2020	7	64	1	7	4	2
2021	10	94	1	5	4	4
2022	6	86	2	5	2	3

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. There is no biological concern with lengthening the seasons for brown bears in 26B. The department can issue up to 20 permits total to nonresidents in all of Unit 26B combined, therefore increasing the season length will not automatically result in additional bears being harvested by nonresidents, as harvest is limited by the number of permits issued.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 169 - 5 AAC 85.020. Hunting seasons and bag limits for brown bears**

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

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would remove the resident registration permits RB988 and RB989 for brown bear in unit 26B reducing the necessary administrative documents and perhaps increasing opportunistic harvest.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - within Dalton Highway Corridor Management Area	One bear every regulatory year	Aug 10-Dec 31 (RB988)	
		Jan 1 – May 31 (RB989).	
	One bear every regulatory year		Aug 25 – May 31 (DB987)
Unit 26B - Remainder	One bear every regulatory year	Aug 25 – Dec 31 (RB988).	
		Jan 1 – May 31 (RB989)	
	One bear ever regulatory year		Aug 25 – May 31 (DB987)

Alaska Statutes require nonresident hunters to be accompanied by an Alaska licensed guide or by a resident relative within second-degree of kindred. All brown bears taken in Unit 26B must be sealed and the take of cubs and sows with cubs is prohibited.

The Board previously made a positive customary and traditional use determination for brown bears in Unit 26, and also established a combined ANS for brown bears in Units 23, 24 and 26, of 25-35 animals.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would remove the resident registration permits RB988 and RB989 for brown bear in unit 26B.

The proposed changes are as follows (deletions are struck through and additions are in bold and underlined):

Unit/Area	Bag Limit	Open season (Permit/Hunt#)	
		Resident	Nonresident
Unit 26B - within Dalton Highway Corridor Management Area	One bear every regulatory year	Aug 10-Dec 31 <del>(RB988)</del>	
		Jan 1 – May 31 <del>(RB989)</del>	
	One bear every regulatory year		Aug 25 – May 31 (DB987)
Unit 26B - Remainder	One bear every regulatory year	Aug 25 – Dec 31 <del>(RB988)</del>	
		Jan 1 – May 31 <del>(RB989)</del>	
	One bear ever regulatory year		Aug 25 – May 31 (DB987)

**BACKGROUND:** The management objectives for brown bears in Unit 26B include managing for a 3-year mean annual human-caused brown bear mortality of  $\leq 27$  bears  $\geq 2$  years old of which no more than 12 are female. This management goal allows a human-caused mortality rate of  $\leq 8\%$  of the 2003 estimated brown bear population of 243-423 in the area (Lenart 2021). Although it is unlikely that another brown bear survey will be conducted for this area due to the high cost of such surveys, there are no biological concerns for brown bears in Unit 26B. Over the past 20 years there has been little evidence of habitat degradation in the area and the prey population has remained stable. In fact, the Central Arctic and Porcupine caribou herds, which are the herds in 26B, are currently experiencing a population increase. Additionally, the restriction on harvesting sows with cubs protects adult sows from harvest, thereby protecting brown bear reproduction.

Hunting pressure for brown bears in Unit 26B remains low. The 5-year (regulatory year (RY) 18-22) mean annual harvest from all hunts was 13 bears per RY (range = 10-15) of which an average of 4 per RY were female (range= 2-8). This is well within the management goal of  $\leq 27$  bears and  $\leq 12$  females. Over the past 5 years (RY18-RY22), there has been an annual average of 81 resident hunters (range = 68 – 104) that report participating in the fall brown bear season (RB988) with an average harvest of 8 bears per year. In the spring brown bear season (RB989), the 5-year annual average was 7 resident hunters (range = 4 - 11) with an average harvest rate of 1 bear per year. For the past 5 years (RY18-RY22), the department has issued between 8 and 15 nonresident permits annually and an average of 7 nonresident hunters (range = 4-10) participated in the drawing harvest (DB987) with an average harvest of 4 bears per year.

Table 1: Hunter residency and success for brown bear in Unit 26B.

Year	RB988		RB989		DB987	
	Successful	Unsuccessful	Successful	Unsuccessful	Successful	Unsuccessful
2018	12	58	0	4	3	1
2019	4	64	0	11	7	3
2020	7	64	1	7	4	2
2021	10	94	1	5	4	4
2022	6	86	2	5	2	3

The registration permits were put in place as a measure to limit the hunting pressure on brown bears in unit 26B. These registration permits were not limited in recent years and the harvest has remained below management objectives. Removing the requirement for obtaining a registration permit prior to hunting in unit 26B may allow more opportunistic hunting to occur where there is a harvestable surplus.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal as there is no biological concern for brown bears in this area and additional harvest exits.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 170 – 5 AAC 84.270(14) Hunting seasons and bag limits for wolverine.**

**PROPOSED BY:** Daniel Hayden

**WHAT WOULD THE PROPOSAL DO?** Lengthen the wolverine trapping season in Unit 25A by two weeks to close on April 15.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 25A                      Open Season: Nov 1 – Mar 31                      Limit: No Limit

There is a positive customary and traditional use finding for all furbearers and fur animals in all units with a harvestable portion for a population, including for wolverine (5 AAC 99.025(a)(13)(M)). The amount reasonably necessary for subsistence uses is 90% of the harvestable portion of the population.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The effect of this proposal would be to lengthen the wolverine trapping season by adding two weeks to the

end of the season. If adopted, additional harvest may occur but no biological concerns are anticipated.

**BACKGROUND:** Wolverine den from February to April. Female wolverines are thought to be especially vulnerable during this time period as they are more at risk to acquire the energy demands they need for lactation and raising young. Limiting trapping seasons is thought to protect the population and ensure a sustainable harvest by protecting females with kits. Additionally, females tend to have higher fidelity to their natal home range or area and do not disperse as far as males. If reproductive females are being taken at higher rates, it may be more difficult for an area to be repopulated as it is less likely for females to disperse widely from another area.

The Interior Region (III) and Western Arctic Region (V) have the latest running wolverine trapping seasons in the state with most seasons ending in March or April. Other regions limit their trapping season because of the possibility of overharvesting reproductive females and leaving orphaned young. Additionally, pelts typically begin to degrade as the weather gets warmer. However, far northern conditions may remain colder into spring and potentially allow for a longer trapping season. This area also has relatively low harvest pressure as the 5-year average annual harvest is nine wolverine per year (range = 6-11 wolverine per year from regulatory year 18-22) with an average of one female trapped in February or March.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. Harvesting in April could result in the take of lactating females, but harvest effort is likely to remain low and sustainable.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposal 171

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**PROPOSAL 172 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Create a muzzleloader-only draw moose hunt within a portion of southern Unit 20A.

**PROPOSED BY:** Middle Nenana River Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a muzzleloader-only draw moose hunt open to residents and nonresidents within the Yanert River drainage upstream of Revine Creek and the Moody Creek drainage upstream of Copeland Creek with season dates of November 1–December 15. The bag limit for residents would be one bull while for

nonresidents would be one bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side.

**WHAT ARE THE CURRENT REGULATIONS?** The current bull moose seasons within the proposed area are:

**Residents:**

- One bull moose with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on at least one side, by harvest ticket, September 1–September 25 OR
- One bull, by drawing permit (DM770, DM774), September 1–September 25

**Nonresidents:**

- One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side, by harvest ticket, September 1–September 25

In addition, the proposed area is within the Yanert and Wood River Controlled Use Areas (CUAs), which restrict motorized access during the fall season.

The intensive management (IM) population objective for moose in Unit 20A is 10,000–15,000 moose and the IM harvest objective is 500–900 moose. The portion of Unit 20A that is outside the Fairbanks Nonsubsistence Area has a positive customary and traditional use finding for moose, with an amount reasonably necessary for subsistence of 50–75 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would add additional bull moose hunting opportunity, by drawing permit only, within portions of the Yanert and Moody Creek drainages in southern Unit 20A. Because it is a drawing hunt, the number of hunters and resulting harvest would be limited. Furthermore, because the proposed hunt dates fall outside of the dates for which motorized access is restricted during the fall season within the Yanert and Wood River CUAs, motorized access would not be restricted.

**BACKGROUND:** The estimated bull-to-cow ratios within the proposed area were 27 and 30 bulls per 100 cows in 2022 and 2021, respectively. These are slightly above the Unit 20A management objective of 25 bulls per 100 cows, which suggests there is a small amount of harvestable surplus of bulls within the proposed area.

The proposed area is contained within the Wood River and Yanert CUAs, both of which restrict motorized access during the fall season. Fall bull harvest within the area is managed via a general season antler-restricted hunt with additional opportunity provided to resident hunters via a limited number of any-bull draw hunts. During RY19–RY22, between 49–60 permits were issued annually in each of the any-bull draw hunt areas that overlap the proposed area, including DM770 (western mountains, including Moody Creek) and DM774 (Yanert River drainage).

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal, which is largely allocative in nature. There is currently a small level of additional harvestable surplus within the proposed area, and this additional opportunity could be allocated through this proposal



to muzzleloader hunters or through current avenues via the allocation of additional any-bull draw permits to residents during the fall season. If this proposal is adopted, the number of hunters and resulting harvest would be controlled via the number of draw permits issued. Permit numbers would be determined based upon estimates of harvestable surplus and bull-to-cow ratio estimates in relation to management objectives.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 173– 5 AAC 85.045(18) Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 20A.

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

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the antlerless moose hunting seasons in Unit 20A.

**WHAT ARE THE CURRENT REGULATIONS?** Antlerless moose hunts are available throughout Unit 20A.

In the Ferry Management Trail, Wood River Controlled Use, and the Yanert Controlled Use Areas antlerless moose hunts are as follows:

Residents:

- Drawing permit for one antlerless moose, August 15–November 15.
- Targeted hunt for one moose by permit (AM751) announced by emergency order.
- Registration permit for one antlerless moose; a person may not take a cow accompanied by a calf, Oct. 1–last day of February. These permits have not been issued for several years because desired harvest is achieved through drawing permits.

Nonresidents:

- No antlerless moose seasons

In the remainder of Unit 20A, antlerless moose hunts are as follows:

Residents:

- Drawing permit for one antlerless moose, August 15–November 15.
- Registration permit for one antlerless moose; a person may not take a cow accompanied by a calf, August 25–last day of February. In most areas of Unit 20A these permits have not been issued for several years because desired harvest is achieved through drawing permits.

- Registration permit, RM768, has been issued to provide reasonable opportunity to harvest antlerless moose for subsistence uses; this hunt occurs outside the Fairbanks Non-subsistence Area (FNA).

Nonresidents:

- No antlerless moose seasons

Hunts for bull moose are also available in Unit 20A. Refer to the *2022–2023 Alaska Hunting Regulations* for specific details about bull moose hunting seasons in Unit 20A.

The intensive management (IM) population objective for moose in Unit 20A is 10,000–15,000 moose and the IM harvest objective is 500–900 moose.

There is a positive customary and traditional use finding for moose in Unit 20A outside the boundaries of the Fairbanks Nonsubsistence Area with an amount necessary for Subsistence of 50–75 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The department will have the authority to administer antlerless hunts as a management tool to regulate the moose population in Unit 20A and to provide subsistence moose hunting opportunity outside the Fairbanks Nonsubsistence Area and antlerless opportunity inside the Fairbanks Nonsubsistence Area.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts help regulate population growth, provide subsistence hunters with a reasonable opportunity to harvest moose, and can reduce incidences of vehicle collision and other nuisance situations. Overall, the goal is to protect the nutritional condition and habitat of the moose population over the long term and to provide for a wide range of public uses and benefits.

The department attempts to maintain the Unit 20A population within the IM population objective while monitoring nutritional status. The last two population surveys in 20A occurred in 2021 and 2022. The 2021 population estimate was 14,041 moose and the 2022 population estimate was 11,028 moose. These abundance estimates equate to 2.5 and 2.3 moose/mi<sup>2</sup> respectively. This moose population has been maintained at high densities for over 30 years, and continues to experience density-dependent effects, including low productivity and relatively light short-yearling female weights. Although sporadic signs of improvement in nutritional condition have been observed (i.e., higher twinning rates in portions of 20A and increases in male short-yearling weights compared to the late 1990s through early 2000s), no clear signals or significant trends have yet been detected. During the winter of 2021-2022 the department took a conservative approach to management and did not issue any antlerless moose permits in Unit 20A because of deep snow and winter icing events that caused a decrease in the moose population. The department also did not issue antlerless permits for the fall 2023 hunting season but will assess the population in November of 2023 to determine if there is a harvestable surplus of antlerless moose for the fall of 2025.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal because antlerless hunts are an important management tool in regulating this high-density,

nutritionally stressed moose population. If antlerless moose hunts are not reauthorized, the department will lose the ability to regulate this moose population, IM harvest objectives may not be met, and the IM population objective may be exceeded. Additionally, the public will lose opportunity to harvest a surplus of moose and subsistence hunters in the portion of Unit 20A outside the FNA (part of the western Tanana Flats) may not have additional opportunities to pursue moose for subsistence uses. Although no antlerless moose permits are being issued in Unit 20A at this time, having the ability to issue antlerless permits if and when there is a harvestable surplus of cow moose is valuable for managing this high density moose population.

**COST ANALYSIS:** Adoption of this proposal would not result in any additional costs to the department.

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**PROPOSAL 174 – 5 AAC 92.540(3)(F) Wood River Controlled Use Area.** Modify the boundary of the Wood River Controlled Use Area in Unit 20A.

**PROPOSED BY:** Middle Nenana River Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would remove a portion of the Wood River Controlled Use Area (WRCUA) along the Totatlanika River. Specifically, this proposal would move the boundary from the east bank of the Totatlanika River between the confluence of Dexter Creek and All Gold Creek and the intersection of the Ferry Trail and the Totatlanika River to a straight line between the two points (Fig. 174-1). This would decrease the overall area of the WRCUA from 1,172 square miles to 1,166 square miles, a reduction of about 0.5% of the current area. The new boundary (with the proposed change in **bold/underline** and the portion to be removed in ~~strikethrough~~) would be as follows:

That portion of Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the 154 south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along the east bank of Dexter Creek to the ~~Totatlanika River~~ **confluence of All Gold Creek, then following a straight line to the intersection of the Totatlanika River and the Ferry Trail**, and then down the east bank of the Totatlanika River to the Rex Trail.

**WHAT ARE THE CURRENT REGULATIONS?** The WRCUA is closed to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through September 30; however, this provision does not prohibit motorized access via, or transportation of game on, the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption.

The current and proposed boundary of the WRCUA is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, motorized users will have legal access to existing mining trails that follow along and cross between the eastern and western banks of the Totalanika River between its confluence with the Ferry Trail and the confluence of Dexter and All Gold Creeks. Currently, motorized users must remain west of the eastern bank of the Totalanika River and thus cannot legally follow the existing mining trails when they cross to the east side of the river. Although this might result in some increase in motorized use in the area, it will likely be minimal given the affected area is a small proportion of the controlled use area. Furthermore, game harvest will likely be minimally affected given the small area of the proposed change.

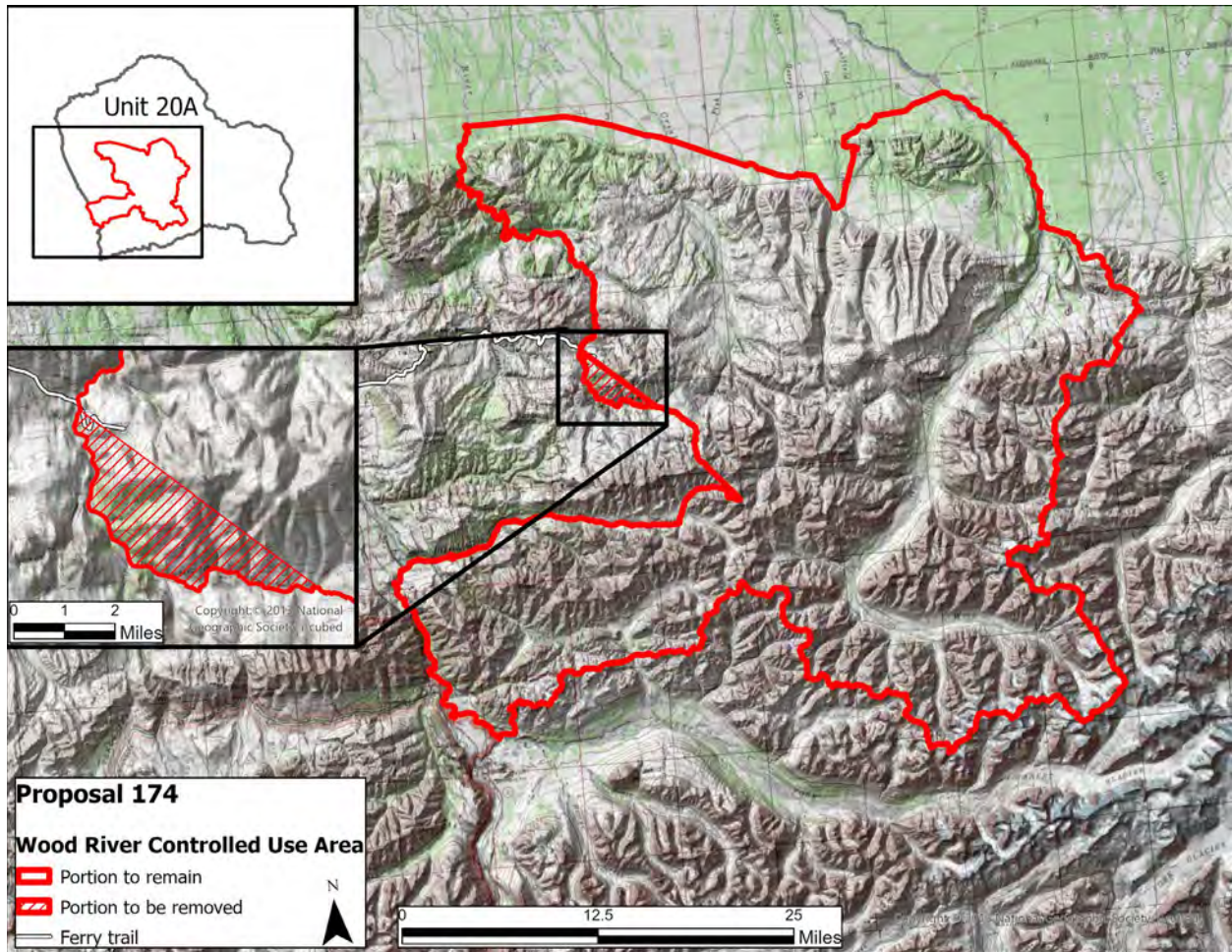


Figure 174-1. Proposed boundary change for the Wood River Controlled Use Area. The crosshatch area is proposed to be removed.

**BACKGROUND:** The WRCUA was established in 1976 with the primary purpose to reduce conflicts among hunters who used all terrain vehicles (ATVs), airplanes, and horses. Since its inception, the CUA has received substantial use by hunters and guides who access the area primarily by aircraft and horseback to hunt moose, sheep, caribou, and grizzly bear. Except for a temporary change in the boundary between 1998–2000 and a clarification of the boundary along a portion of the Wood River in 2000, the boundary of the CUA has remained unchanged since 1983.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocation proposal and has no biological concerns with the proposed change. The WRCUA was put into place to address user conflicts among hunters using different modes of transportation and therefore changes to the CUA boundary should be determined by the board.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 175 – 5 AAC 92.540(3)(F) Wood River Controlled Use Area.** Modify the boundary of the Wood River Controlled Use Area in Unit 20A.

**PROPOSED BY:** Joseph Kurber

**WHAT WOULD THE PROPOSAL DO?** This proposal would remove a portion of the Wood River Controlled Use Area (WRCUA) along the Totatlanika River. Specifically, this proposal would move the boundary from the east bank of the Totatlanika River between the confluence of Dexter Creek and All Gold Creek and the intersection of the Ferry Trail and the Totatlanika River to straight lines between the two points and Murphy Peak (Fig. 175-1). This would decrease the overall area of the WRCUA from 1,172 square miles to 1,160 square miles, a reduction of about 1% of the current area. The new boundary (with the proposed change in **bold/underline** and the portion to be removed in ~~strike through~~) would be as follows:

That portion of Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the 154 south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along the east bank of Dexter Creek to the ~~Totatlanika River~~ **confluence of All Gold Creek, then following a straight line to Murphy Peak, then following a straight line to the intersection of the Totatlanika River and the Ferry Trail**, and then down the east bank of the Totatlanika River to the Rex Trail.

**WHAT ARE THE CURRENT REGULATIONS?** The WRCUA is closed to the use of any motorized vehicle, except aircraft, for big game hunting, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through September 30; however, this provision does not prohibit motorized access via, or transportation of game on, the Parks Highway, or the transportation into the area of game meat that has been processed for human consumption.

The current and proposed boundary of the WRCUA is entirely within the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, motorized users will have legal access to: 1) existing mining trails that follow along and cross between the eastern and western banks of the Totalanika River between its confluence with the Ferry Trail and the confluence of Dexter and All Gold Creeks, and 2) a small portion of the Ferry Trail on the east side of the Totalanika River. Currently, motorized users must remain west of the eastern bank of the Totalanika River and thus cannot legally follow the existing trails when they cross to the east side of the river. Although this might result in some increase in motorized use in the area, it will likely be minimal given the affected area is a small proportion of the controlled use area. Furthermore, game harvest will likely be minimally affected given the small area of the proposed change.

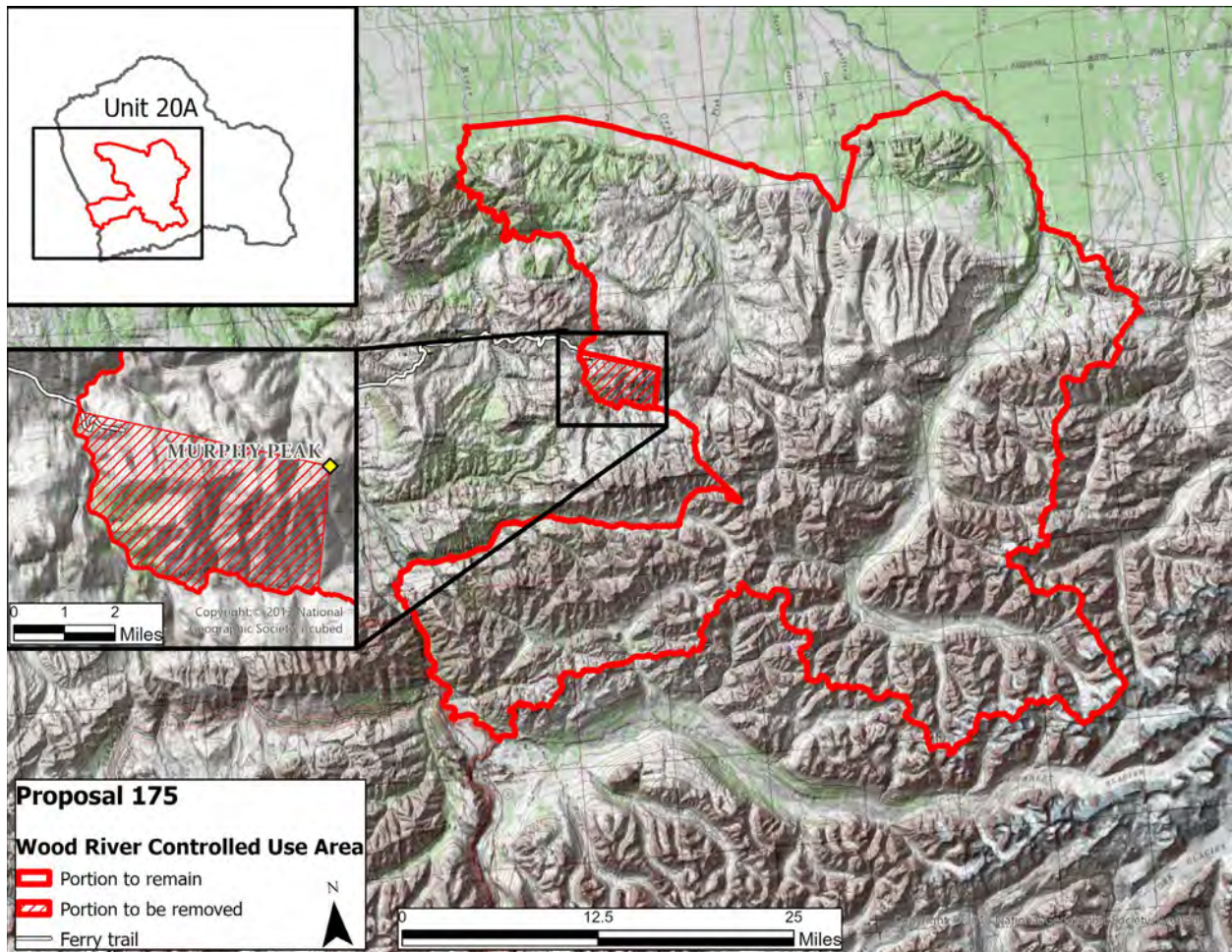


Figure 175-1. Proposed boundary change for the Wood River Controlled Use Area. Crosshatch area is proposed to be removed.

**BACKGROUND:** The WRCUA was established in 1976 with the primary purpose to reduce conflicts among hunters who used all terrain vehicles (ATVs), airplanes, and horses. Since its inception, the CUA has received substantial use by hunters and guides who access the area primarily by aircraft and horseback to hunt moose, sheep, caribou, and grizzly bear. Except for a

temporary change in the boundary between 1998–2000 and a clarification of the boundary along a portion of the Wood River in 2000, the boundary of the CUA has remained unchanged since 1983.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** regarding this allocation proposal and has no biological concerns with the proposed change. The WRCUA was put into place to address user conflicts among hunters using different modes of transportation and therefore changes to the CUA boundary should be determined by the board.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 176 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Reduce the nonresident moose bag limit and eliminate nonresident moose hunting opportunity in portions of Unit 20B.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** This proposal would reduce the nonresident bull moose bag limit within portions of Unit 20B and eliminate all nonresident antlerless moose hunting opportunity in Unit 20B. The bag limit reduction would occur within that portion of Unit 20B for which the current nonresident bull moose bag limit is one bull or one bull with spike-fork antlers or greater. Within these areas, the bag limit would change to one bull moose with 50-inch antlers or antlers with 4 or more brow tines on at least one side. The portions of Unit 20B this bag limit change would affect include the Middle (East) Fork of the Chena River, the Salcha River drainage upstream from and including Goose Creek, and the Fairbanks Management Area (including Creamer’s Field Migratory Waterfowl Refuge). The elimination of nonresident antlerless moose hunting opportunity would affect three draw hunts within the Fairbanks Management Area (FMA).

**WHAT ARE THE CURRENT REGULATIONS?** The current bull moose seasons and bag limits within the portions of Unit 20B in which the nonresident bull bag limit would change if this proposal were passed are:

Unit 20B, that portion within the FMA (including Creamer’s Refuge):

- Residents and nonresidents, by harvest ticket, September 1–30 and November 21–27, one bull with spike-fork or greater antlers

Unit 20B, the drainage of the Middle Fork of the Chena River

- Residents and nonresidents, by harvest ticket, September 1–25, one bull
- Residents and nonresidents, by harvest ticket, September 26–30, one bull by bow and arrow only



Unit 20B, that portion of the Salcha River drainage upstream from and including Goose Creek

- Residents and nonresidents, by harvest ticket, September 1–25, one bull
- Residents and nonresidents, by harvest ticket, September 26–30, one bull by bow and arrow only

The current antlerless moose hunting seasons and bag limits within the portions of Unit 20B in which the nonresident antlerless moose hunting opportunity would be eliminated if this proposal were passed are:

Unit 20B, that portion within Creamer’s Refuge:

- Residents and nonresidents, by drawing permit (DM789), December 1–January 31, one antlerless moose by muzzleloader only

Unit 20B, that portion within the Fairbanks Management Area (including Creamer’s Refuge):

- Residents and nonresidents, by drawing permit (DM786 and DM788), September 1–November 27, one antlerless moose by bow and arrow only

The intensive management (IM) population objective for moose in Unit 20B is 12,000–15,000 moose and the IM harvest objective is 600–1,500 moose. Additionally, there is a positive customary and traditional use finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an amount reasonably necessary for subsistence of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would result in the alignment of the nonresident bull moose antler-restricted bag limit throughout Unit 20B and would eliminate the opportunity for nonresidents to receive three different antlerless draw moose hunts within the FMA or portions thereof. Collectively, this would reduce nonresident moose hunting opportunity and would therefore likely lead to a reduction of the nonresident moose harvest within the unit.

**BACKGROUND:** There are no biological concerns with the moose populations in the areas affected by this proposal under the current harvest strategy. Current moose harvest levels within these areas appear to be within harvestable surplus and bull-to-cow ratio management objectives are being met. The Unit 20B bull-to-cow ratio management objective is to manage for a post-hunting sex ratio of  $\geq 20$  bulls:100 cows within each count area, and the estimated bull-to-cow ratio in the combined Middle Fork Chena River and Upper Salcha River areas (2,111 square miles) was 28 bulls:cows (90% confidence interval [CI] 20–35) in 2020 and 23 bulls:100 cows (90% CI 11–34) in 2017. The FMA does not have a specific bull-to-cow ratio management objective but instead the harvest strategy is to reduce moose numbers through harvest to reduce vehicle-moose collisions and nuisance moose issues.

Nonresidents harvested 18% and 29% of the total bull moose taken within the Middle Fork and Upper Salcha Rivers, respectively, during RY18–RY22 (Table 176-1). Of the bulls taken by nonresidents within these areas, 48% had antlers <50” and less than 4 brow tines on both sides.

Within the Fairbanks Management Area bull and antlerless moose hunts, nonresident hunters and harvest composed 4% or less of the total (Table 176-1).

Area	Average annual hunters	% Nonresident hunters	Average annual harvest	% Nonresident harvest
Middle Fork Chena River	48	15%	10	18%
Upper Salcha River	42	27%	17	29%
FMA <sup>1</sup> bull hunt	18	1%	17	1%
FMA <sup>1</sup> antlerless draw hunt	81	3%	28	4%
FMA <sup>1</sup> antlerless disabled draw hunt	26	2%	7	3%
Creamer's Refuge muzzleloader antlerless draw hunt	6	0%	2	0%

<sup>1</sup> Fairbanks Management Area

Table 176-1. Average annual number of hunters and reported harvest, as well as the proportion that were nonresidents, for regulatory years 2018–2022 for the areas within Unit 20B that would be affected by Proposal 176.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue and poses no biological concerns.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 177 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Create a fall archery hunt for moose in Unit 20B remainder.

**PROPOSED BY:** Alaska Bowhunters Association

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a 5-day (September 16–20) archery moose season in the remainder of Unit 20B for residents and nonresidents after the regular bull moose season. The bag limit for the archery season would be the same as the regular bull moose bag limit, meaning an any-bull bag limit for residents and an antler-restricted bag limit for nonresidents.

**WHAT ARE THE CURRENT REGULATIONS?** The following are the bull moose seasons within Unit 20B remainder, which encompasses 5,812 square miles (63% of the entire unit) of the more accessible areas within the unit:

Residents:

- One bull moose, by harvest ticket, September 1–15

Nonresidents:

- One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side, by harvest ticket, September 5–15

The intensive management (IM) population objective for moose in Unit 20B is 12,000–15,000 moose and the IM harvest objective is 600–1,500 moose. Additionally, there is a positive customary and traditional use finding for moose in Unit 20B outside the Fairbanks Nonsubsistence Area and outside the Minto Management Area, with an amount reasonably necessary for subsistence of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would create a late moose hunting season for archery hunters, giving archery hunters 5 more days to hunt moose in Unit 20B remainder. Given Unit 20B remainder encompasses the road system and more accessible portions of the unit, this would result in an increase in the Unit 20B remainder bull moose harvest.

**BACKGROUND:** The Unit 20B bull-to-cow ratio is below the unitwide management objective of 30 bulls per 100 cows. The 2017 and 2020 estimated bull-to-cow ratios were 18 and 24 bulls per 100 cows, respectively, which indicate that bull harvest was likely too high to achieve the objective during those years.

To address the low bull-to-cow ratio, the Unit 20B remainder bull moose season was shortened by 5 days by emergency order for fall 2018 and 2019 and by board action beginning in 2020. The season was shortened from a September 1–20 season for residents and a September 5–20 season for nonresidents to a September 1–15 and September 5–15 season for residents and nonresidents, respectively. This reduction in season length likely helped the bull-to-cow ratio increase between the 2017 and 2020 surveys, although the ratio still remained below the objective in 2020.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal because of conservation concerns related to the bull-to-cow ratio. The bull-to-cow ratio improved between 2017–2020, likely in response to the shortened moose hunting season dates in Unit 20B remainder, but the ratio remained below the objective. Therefore, the department does not recommend additional bull harvest opportunity within Unit 20B remainder until the ratio recovers to above the objective. The department is neutral on methods and means, and allocation of hunting opportunity between archery and rifle hunters.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 178 – 5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20B.

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

**WHAT WOULD THE PROPOSAL DO?** Reauthorize antlerless moose hunting seasons in Unit 20B.

**WHAT ARE THE CURRENT REGULATIONS?** Antlerless moose hunts are authorized in Unit 20B by drawing, registration, or targeted permit only, as follows:

Fairbanks Management Area, including Creamer's Field

Residents and nonresidents:

- 1 antlerless moose by drawing permit, by bow and arrow only, up to 150 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, September 1–November 27;
- 1 antlerless moose by muzzleloader by drawing permit, up to 10 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, Dec 1–January 31.

Fairbanks Management Area, outside of Creamer's Field

Residents only:

- 1 moose by targeted permit by shotgun, crossbow or bow and arrow only, up to 100 permits, season to be announced by emergency order

Minto Flats Management Area

Residents only:

- 1 antlerless moose by registration permit, October 15–February 28

Middle Fork of the Chena River drainage

Residents only:

- 1 antlerless moose by drawing permit, up to 300 permits, taking of calves or cows with calves is prohibited, August 15–November 15
- 1 antlerless moose by registration permit, taking of calves or cows with calves is prohibited, October 1– Last day of February

Southeast of the Moose Creek dike within ½ mile each side of the Richardson Highway

Residents only:

- 1 moose by drawing permit, by bow and arrow, crossbow, or muzzleloader, up to 100 permits, September 16–Last day of February
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order

## Remainder of Unit 20B

### Residents only:

- 1 antlerless moose by drawing permit, by youth hunt only, up to 200 permits, August 5–14;
- 1 antlerless moose by drawing permit, up to 1,500 permits, taking of cows with calves is prohibited, August 15–November 15
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Hunts for bull moose are also available in Unit 20B. Refer to the *2023–2024 Alaska Hunting Regulations* for specific details about moose hunting seasons in Unit 20B.

There is a positive C&T finding for moose in Unit 20B, within the Minto Flats Management Area, with an ANS of 20–40 moose.

There is a positive C&T finding for moose in Unit 20B, outside the boundaries of the Minto Flats Management Area and outside the boundaries of the Fairbanks Nonsubsistence Area, with an ANS of 75–100 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Antlerless hunts will continue to be available to hunters, and the department will continue to have the ability to use antlerless hunts as a tool to regulate the moose populations.

**BACKGROUND:** Antlerless moose hunting seasons must be reauthorized annually. The department’s goal in Unit 20B is to provide for a wide range of public uses and benefits and to protect the nutritional condition and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, provide hunting opportunity, help meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. If antlerless hunts are not reauthorized, subsistence hunters in the portion of Unit 20B outside the Fairbanks Nonsubsistence Area may not have additional opportunities to pursue moose for subsistence uses.

The department has administered multiple different antlerless hunts over the last 10 years in 20B. Currently the moose population is estimated to be within the Intensive Management objective of 12,000–15,000 moose, therefore the necessity for antlerless harvest is minimal and fewer hunts are being offered at this time. The antlerless hunts that the department is currently administering are as follows:

*Fairbanks Management Area (FMA)* – The purposes of these antlerless hunts are to regulate population growth in the FMA and potentially reduce moose–vehicle collisions and moose–human conflicts.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose–human conflicts continue to place significant demands on property owners. To increase hunting opportunity and harvest and to reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during Regulatory Year 1999 (RY99; that is, RY = 1 July 1999 through 30 June 2000) through RY10. Moose–vehicle collisions and moose–human conflicts declined during RY06–RY21, presumably, in part due to the consistent antlerless moose harvests during RY09–RY21.

*Richardson Highway Hunt* -The Richardson highway hunt is a drawing moose permit that allows hunters to hunt any moose within ½ mile on either side of the Richardson highway with bow and arrow, muzzleloader or crossbow. The hunt is intended to reduce roadkill along the Richardson Highway.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with the harvest of antlerless moose taken under these regulations in these hunt areas; however, elimination of these hunts would create a biological concern. The Unit 20B moose population has potential for growth due to the extensive burns (i.e., increased productivity) and high survival rates. If antlerless moose hunts are not reauthorized, the moose population may exceed carrying capacity and would require population reduction. The department would like to continue to have the ability to regulate moose densities in response to habitat and population performance while providing opportunities to hunt antlerless moose and help meet IM harvest objectives.

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

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Proposal 179

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**PROPOSAL 180 – 5 AAC 92.069. Special provisions for moose and caribou drawing permit hunts.** Change the allocation of permits for Delta caribou hunt DC827 in Unit 20A.

**PROPOSED BY:** Resident Hunters of Alaska

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the nonresident allocation of Delta caribou hunt drawing permits. The proponent lists two options within the proposal: the first option would remove the current 25% allocation to nonresidents, in which case the apportionment for nonresidents would occur through the random draw process. The second option would set the nonresident allocation at up to 10% of the total permits.

**WHAT ARE THE CURRENT REGULATIONS?** Unit 20A caribou, residents and nonresidents: 1 bull by drawing permit (DC827, up to 200 permits may be issued); August 10–

September 20. Of the total drawing permits issued, a maximum of 25% will be issued to nonresidents, and a minimum of 75% will be issued to residents.

The Delta caribou herd has a negative intensive management finding. The majority of the hunt area is located within the Fairbanks Nonsubsistence Area (NSA); however, the board has not made a customary and traditional use finding (C&T) for that portion outside of the NSA.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The effect of this proposal depends on the option selected by the board. The first option would remove the set allocation for nonresidents and instead the apportionment for nonresidents would occur through the random draw process, which could result in an unknown percentage of permits going to nonresidents. The second option would reduce the allocation for nonresidents from up to 25% to up to 10% of the total permits. During recent years, 150 permits have been issued annually. Using this as an estimate of the future number of permits to be issued, the second option would reduce the maximum number of permits issued to nonresidents from 37 to 15.

**BACKGROUND:** The Delta caribou herd in Unit 20A has an estimated population size of 2,000–3,000 caribou and has a management goal to provide opportunity to harvest trophy caribou on a sustainable basis within the framework of a high-quality hunt. Since regulatory year (RY) 2004, 150 permits have been issued annually and the average annual harvest during RY18–RY22 was 65 bulls. Prior to RY21, there was no set allocation of permits to nonresidents and thus the proportion of permits to nonresidents occurred through the random draw process. During RY11–RY20, an average of 20 permits (13% of the total) were awarded annually to nonresidents and these nonresidents took an average of 21% of the caribou harvested annually. The proportion of permits awarded to nonresidents during this time period was not stable and increased from an average of 8% during RY11–RY16 to 21% during RY17–RY20. In March 2020, the board changed the allocation of permits to nonresidents to a maximum of 25% of the total permits issued; this change took effect beginning in RY21. During RY21–RY22, the department issued 37 permits (24.7% of the total) annually to nonresidents, and nonresidents took 30% of the total caribou harvested.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is an allocation issue. Prior to deliberating this proposal, the board may wish to examine board finding 2017-222-BOG, which is the “Alaska Board of Game Nonresident Hunter Allocation Policy.” Additionally, the board may wish to make a C&T finding for the herd for that portion of the hunt area that is outside of the Fairbanks NSA.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposals 181-185

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**PROPOSAL 186– 5 AAC 92.510. Areas closed to hunting. 5 AAC 92.550. Areas closed to trapping.** Establish closed areas for the taking of wolves near Denali National Park in Unit 20C.

**PROPOSED BY:** Denali National Park and Preserve

**WHAT WOULD THE PROPOSAL DO?** That portion of Unit 20C in Uniform Coding Units 0502, 0605 and 0607 west of the George Parks Highway and bounded by Denali National Park on 3 sides (Stampede Corridor), would be closed to the taking of wolves by hunting and trapping.

**WHAT ARE THE CURRENT REGULATIONS?**

*Resident and nonresidents*

Hunting:

- Unit 20C, remainder: Aug. 10–April 30 (ten wolves)
- Unit 20C, within the Stampede Corridor: Aug. 10–Apr. 15 (10 wolves)

Trapping:

- 20C: Nov. 1–Apr. 30 (No limit)

There is a positive customary and traditional use finding for wolves in Units 17, 19-21, 24, 25, 26(B) and 26(C) (5 AAC 99.025(11)). The amount reasonably necessary for subsistence for wolves in these areas is 90% of the harvestable portion of the population (5 AAC 99.025(13)).

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted this proposal would close wolf hunting and trapping opportunity in a portion of Unit 20C.

**BACKGROUND:** From 2000 to 2010, the Alaska Board of Game (board) approved the year-round closure to wolf hunting and trapping of certain areas adjacent in the Stampede Corridor near the Denali National Park boundary in order to protect specific packs near the park boundary. In 2010, the board rescinded the Stampede and Nenana Canyon wolf buffers. In 2017, the board passed a regulation which closed the wolf hunting season in the Stampede area on April 15 to prevent the take of wolves at bear bait stations.

The department provides the following factors for the board to consider when making this decision: 1) the existing biological data show that the harvest of wolves outside the park is not a biological concern for sustainability of populations or packs within or outside of the park and preserve; 2) although harvest occurs by trappers adjacent to the park, not all of the harvest occurred within the proposed buffer area and not all was from packs that have been available for



viewing by park visitors; and 3) viewing opportunities for the public in the park depend mostly on where wolves den, where they make kills, and the predominant vegetation types along the viewing routes.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal because wolves are managed at the population level not the UCU level and this proposal is an unnecessary loss of opportunity for subsistence users and others who hunt and trap wolves. There are no biological concerns, as the harvest of wolves in the proposed area is low (averaging fewer than 5 annually) and has no effect on the area’s sustainable wolf population. Furthermore, the proponent did not provide any data or information that the proposed buffer will protect wolves that are frequently viewed by park guests. Additionally, Denali National Park is closed to the hunting and trapping of wolves, providing ~4.7 million acres of refugia directly adjacent to the proposed closure area.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 187 – 5 AAC 84.270(14). Furbearer Trapping.** Lengthen the wolverine trapping season in a portion of Unit 20C.

**PROPOSED BY:** Raymond Heuer

**WHAT WOULD THE PROPOSAL DO?** This proposal would lengthen the wolverine trapping season in the eastern portion of Unit 20C, east of the Toklat and Kantishna rivers, from November 1–February 29 to November 1–March 31.

**WHAT ARE THE CURRENT REGULATIONS?** The wolverine trapping season in Unit 20C east of the Toklat and Kantishna Rivers is November 1–February 29 while the season west of the Toklat and Kantishna Rivers is November 1–March 31. Neither area has a bag limit for trapping wolverine.

There is a positive customary and traditional use finding for wolverine in all units with a harvestable portion with an amount reasonably necessary for subsistence of 90% of the harvestable portion.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would align the wolverine trapping season dates throughout Unit 20C and would extend the trapping season in the eastern portion of the unit by 31 days. This extension would likely result in a modest increase in the number of wolverines harvested within the unit.

**BACKGROUND:** There is no wolverine population estimate for Unit 20C, but it is common to see wolverine tracks within the unit while conducting surveys for other species. The long-term Unit 20C wolverine harvest has remained stable despite the one-month extension of the trapping

season within the western portion of the unit since RY17. Harvest averaged 12 wolverines per year during RY17–RY21, of which only one was taken during the month of March. Of the annual harvest, an average of seven were taken east of the Toklat and Kantishna rivers, which is the area that would be affected by this proposal. Trapping effort is greater in the eastern compared to the western portion of the unit due to easier access from the road system. Approximately 70% of the harvest during RY17–RY21 were males, which met the Unit 20C management objective to manage for a harvest composed of >50% males.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal. While the proposed change may result in an increase in wolverine harvest, current harvest is composed mostly of males and the potential increase in harvest is unlikely to be significant enough to have a detrimental impact on the population. Additionally, most of southern Unit 20C is within Denali National Park, which provides a large area of refugia for Unit 20C wolverine. In general, the department supports alignment of trapping seasons where possible to reduce regulatory complexity and supports increased opportunity when it creates no biological concerns.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 188– 5 AAC 84.270 Trapping Season and Bag Limits.** Open beaver trapping in a portion of Unit 20B.

**PROPOSED BY:** Stephen Meyers MD

**WHAT WOULD THE PROPOSAL DO?** This proposal would open the trapping season November 1 through April 15 for beavers in “that portion of the Chena River downstream of the confluence with the Little Chena River”.

**WHAT ARE THE CURRENT REGULATIONS?**

Beaver Trapping season

Remainder of Unit 20B	September 25 – May 31	No limit
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Unit 20B, That portion of the Chena River downstream from its confluence with the Little Chena River.	No Open Season
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The portion of Unit 20B in the proposal is located entirely within the Fairbanks Nonsubsistence Use Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Adopting this proposal would open the beaver trapping season along the portion of the Chena River that

flows through downtown Fairbanks, Fort Wainwright and other urban areas near Fairbanks. Currently, the season is closed.

**BACKGROUND:** That portion of the Chena River downstream of its confluence with the Little Chena River has been closed to beaver trapping for over 25 years. That portion of the river flows through neighborhoods and highly populated areas near Badger Road, Fort Wainwright and downtown Fairbanks and is completely within the Fairbanks nonsubsistence area. The population of beavers within this area and in the remainder of the Chena River is healthy as it is excellent beaver habitat. Although the trapping season has been closed in the proposed area for years, the department issues up to a dozen or more nuisance beaver permits annually under the authority of 5 AAC 92.041. This allows permits to be issued to harvest beavers that are causing damage to property or resources. This system has worked well because it allows the department to target specific beaver colonies for harvest and avoid trapping in highly utilized recreational areas or private land. It also allows the department to mitigate issues between trappers and those that do not want the beavers harvested.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because there is no biological concern. The board may wish to consider the effects of increased conflicts among residents of this area that may occur if this proposal is adopted.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 189 – 5 AAC 92.015. Brown bear tag fee exemption.** Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal will reauthorize the brown bear tag fee exemptions in Units 9, 11, 13, 16, and 17.

**WHAT ARE THE CURRENT REGULATIONS?** The following regulations are currently in effect for Region IV brown bear hunts:

5AAC 92.015. Brown bear tag fee exemption

- (a) A resident tag is not required for taking a brown bear in the following units:
  - (1) Unit 11;
  - (2) Units 13 and 16A;
  - (3) Units 16B and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9B, within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9C, within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9D, within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9E, within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

(1) Unit 9B;

(2) Unit 9E, that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Units 9D and 9E;

(3) Unit 17;

...

There is a positive customary and traditional use finding (C&T) for brown bears in those portions of Units 17A and 17B that drain into the Nuyakuk and Tikchik lakes, with an amount reasonably necessary for subsistence (ANS) of 5 bears. There is a positive C&T finding for brown bears in the remainder of Unit 17B, and in Unit 17C, with an ANS of 10–15 bears.

There is a positive C&T finding in Unit 9B, with an ANS of 10–20 bears, and a positive C&T finding in 9E, with an ANS of 10–15 bears. The remainder of Unit 9 has a negative C&T finding.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Hunters will not be required to purchase a brown bear locking tag before hunting brown bears in Units

11, 13, 16, and 17. In addition, brown bear tag fees will not be required for subsistence hunts in Units 9 and 17 or for permit hunts near communities in Unit 9.

**BACKGROUND:** Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

**General Season Hunts:** The Board liberalized brown bear hunting regulations, including the tag fee exemption, to increase the opportunity to take brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these Units provides greater opportunity to harvest brown bears by allowing opportunistic take.

The board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities during the March 2011 Board of Game meeting. Brown bears are abundant in Unit 9 and are managed as a trophy species. Brown bears are frequently observed in communities destroying property in search of food or garbage and occasionally killing pets. The liberalized bear seasons and bag limits along with the elimination of the tag fee is intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of DLP bears.

**Subsistence Brown Bear Hunts:** The Board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9.

Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal because it provides greater sustainable harvest opportunity in Units 11, 13, 16, and 17; addresses public safety concerns in Unit 9; and provides subsistence harvest opportunity in portions of Units 9 and 17.

**COST ANALYSIS:** Adoption of this proposal would not result in significant costs to the department.

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Proposal 190 was heard at the January 2024 Board of Game Meeting in Kotzebue.

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**PROPOSAL 191 – 5 AAC 085.045(a)(4) Hunting seasons and bag limits for moose.**  
 Reauthorize the antlerless moose seasons in Unit 6C.

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

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would ensure that the department has the necessary tools to manage the Unit 6C moose population within objectives.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4) ...		
Unit 6(C)  1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued	Sept. 1–Oct. 31 (General hunt only)	No open season
1 moose by registration permit only ...	Nov. 1–Dec. 31	No open season

The board has made a negative customary and traditional use finding for all of Unit 6.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes antlerless hunts in Unit 6C as required by statute. Resident hunters would be able to continue to harvest antlerless moose during hunts administered by ADF&G on state-managed lands in Unit 6.

**BACKGROUND:** Antlerless moose seasons must be reauthorized annually. The population objective is 600–800 moose. A population survey completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. This population is aggressively harvested to maintain within population objectives. We have managed this hunt cooperatively with the U. S. Forest Service and the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season. We have not held the state antlerless hunt since the 1999–2000 season. In 2013, a registration hunt was established that could be used to harvest moose, including antlerless, if the federal subsistence hunt is not held or it does not result in the desired amount of harvest. At this time, quotas have been adjusted on both the federal and state side to

bring the population to within its objectives. Continuation of the antlerless hunts is necessary to achieve population objectives.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to reauthorize antlerless harvests in Unit 6.

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

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Proposal 192

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**PROPOSAL 193 – 5 AAC 85.045(11). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in Unit 13C.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose hunt in Unit 13C; this hunt must be re-authorized annually by the Board of Game to comply with statutory requirements.

**WHAT ARE THE CURRENT REGULATIONS?** The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2023–2024 Alaska Hunting Regulations*.

The department is authorized to issue up to 200 drawing permits for antlerless moose hunts in Unit 13C for an October 1–31 season. Hunters are prohibited from taking calves and cows accompanied by a calf.

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

cow accompanied by a calf

...

The board made a positive customary and traditional use finding for moose in all of Unit 13, with an amount reasonably necessary for subsistence of 300–600 moose for the entire game management unit.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes the antlerless moose hunt in Unit 13(C) for the 2024 regulatory year; antlerless hunts are needed to keep the moose population within intensive management objectives and provide additional hunting opportunity for residents.

**BACKGROUND:** The board has directed the department to issue antlerless moose permits when the moose population is at or above the midpoint of the population objective with the goal of harvesting up to 1% of the cow moose population. The current population objective for Unit 13C is 2,000–3,000, and the 3-year running average of estimated moose abundance has been above objectives since 2010. The antlerless hunt in 13C is necessary to maintain the moose population within the intensive management objectives and provide for additional harvest opportunity for the public.

The antlerless moose hunt for 13C was established in January 2022; the first hunt was held in October 2023. Permit numbers for the upcoming hunting season must be determined before annual moose surveys can be completed. As such, following a relatively severe winter in 2021/22 with heavy snowfall only 10 permits were issued for the RY2023 season due to uncertainty surrounding moose numbers following the winter season. The population was reassessed in early winter 2022/23. Up to 1% of the estimated cow moose population would provide for a potential harvest of up to 21 cow moose. Only three hunters reported hunting in RY2023, and no antlerless moose were harvested. Fifteen permits will be issued for the RY2024 season.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Antlerless moose hunts must be re-authorized annually by the board to comply with statutory requirements. These hunts are an essential management tool to regulate the moose populations within the established intensive management objectives for population size, sex ratios, and harvest.

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

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**PROPOSAL 194 – 5 AAC 85.045(11). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in Unit 13E.

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



**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose hunt in Unit 13E; this hunt must be re-authorized annually by the Board of Game to comply with statutory requirements.

**WHAT ARE THE CURRENT REGULATIONS?** The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2023–2024 Alaska Hunting Regulations*.

The department is authorized to issue up to 200 drawing permits for antlerless moose hunts in Unit 13E for an October 1–31 season. Hunters are prohibited from taking calves and cows accompanied by a calf.

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

The board made a positive customary and traditional use finding for moose in all of Unit 13, with an amount reasonably necessary for subsistence of 300–600 moose for the entire game management unit.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes the antlerless moose hunt in Unit 13(E) for the 2024 regulatory year; antlerless hunts are needed to keep the moose population within intensive management objectives and provide additional hunting opportunity for residents.

**BACKGROUND:** The board has directed the department to issue antlerless moose permits when the moose population is at or above the midpoint of the population objective with the goal of harvesting up to 1% of the cow moose population. The current population objective for Unit 13E is 5,000–6,000, and the 3-year running average of estimated moose abundance has been above objectives since 2014. The antlerless hunt in 13E is necessary to maintain the moose population within the intensive management objectives and provide for additional harvest opportunity for the public.

The antlerless moose hunt for 13E was established in January 2022; the first hunt was held in October 2023. Permit numbers for the upcoming hunting season must be determined before annual moose surveys can be completed. As such, following a relatively severe winter in 2021/22 with heavy snowfall only 5 permits were issued for the RY2023 season due to uncertainty surrounding moose numbers following the winter season. The population was reassessed in early winter 2022/23. Up to 1% of the estimated cow moose population would provide for a potential harvest of up to 37 cow moose. Of the five permits issued, two were hunted and both those hunts were successful. Twenty permits will be issued for the RY2024 season.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Antlerless moose hunts must be re-authorized annually by the board to comply with statutory requirements. These hunts are an essential management tool to regulate the moose populations within the established intensive management objectives for population size, sex ratios, and harvest.

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

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Proposal 195

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**PROPOSAL 196 – 5 AAC 85.045 (12). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 14(C).

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

**WHAT WOULD THE PROPOSAL DO?** Reauthorize the antlerless moose seasons in Unit 14(C).

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are:

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
<u>Units and Bag Limits</u>		

(12)

...

Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management	Sept 1—Mar 31 (General hunt only)	Sept 1—Mar 31
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Area

1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued

Unit 14(C), that portion known as the Birchwood Management Area

Sept. 1—Sept. 30  
(General hunt only)

Sept. 1—Sept. 30

1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued

Unit 14(C), that portion known as the Anchorage Management Area

Sept. 1—Nov. 30  
(General hunt only)

No open season

1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued

Unit 14(C), that portion of the Ship Creek drainage upstream of the Joint Base Elmendorf-Richardson (JBER) Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or

Sept. 1—Sept. 30  
(General hunt only)

Sept. 1—Sept. 30

1 bull by registration permit only

Oct. 1—Nov. 30  
(General hunt only)

Oct. 1—Nov. 30

...

Remainder of Unit 14(C)

1 moose per regulatory year, only as follows:

1 bull with spike-fork antlers or 50-inch antlers or antlers with

Sept. 1—Sept. 30  
(General hunt only)

Sept. 1—Sept. 30

3 or more brow tines on one side; or

1 antlerless moose by drawing permit only; up to 60 permits may be issued; or

Sept. 1—Sept. 30  
(General hunt only)

No open season

1 bull by drawing permit only, by bow and arrow only; up to 10 permits may be issued

Oct. 20—Nov. 15

No open season

...

Unit 14(C) lies entirely within the Anchorage-Matsu-Kenai Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

Adoption of this proposal is necessary for antlerless hunts in Unit 14(C) to continue. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14(C) at a population level low enough to reduce conflicts with residents, over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. At this level, the moose population will be healthier due to decreased stress levels associated with winter food shortages.

**BACKGROUND:** A combined 2023 aerial composition count of the JBER Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14(C)) found 222 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 9 calves per 100 cows. In 2021, a survey of the same area found a total of 301 moose with ratios of 44 bulls per 100 cows and 20 calves per 100 cows, respectively. The persistent, deep snowpack during the winter of 2022 likely resulted in additional winter mortality and an increase in the late winter energetic demands on pregnant cows, potentially reducing both the bull:cow and calf:cow estimates for the population. However, harvest numbers continue to remain relatively steady, and at this population level we have received fewer reports of human-moose conflicts and moose-vehicle collisions.

Antlerless moose hunts must be reauthorized annually. The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality.

Table 196-1. Cow moose harvest in Unit 14(C), regulatory years 2019–2022.

Regulatory Year	Either Sex Permits	Antlerless Permits	Cows Harvested
2019	50	26	19
2020	50	26	24

2021	50	26	24
2022	50	26	32

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to reauthorize antlerless hunts in Unit 14(C). These hunts have been successful in providing additional moose hunting opportunities in the State’s largest human population center with little controversy while providing additional food security. In addition, the harvest of antlerless moose has helped achieve the Department’s goal of maintaining moose numbers at a level that minimizes conflicts, moose-vehicle collisions, and winter die-offs, while still maintaining hunting opportunity.

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

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**PROPOSAL 197– 5 AAC 85.045 (5). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Units 7 and 14(C).

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

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C).

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations are:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(5)		
...		
Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage		

**RESIDENT HUNTERS:**

1 moose by drawing permit	Aug. 20—Oct. 10
---------------------------	-----------------

only; up to 60 permits (General hunt only)  
 for bulls will be issued in  
 combination with nonresident  
 hunts, and up to 70 permits for  
 antlerless moose will be issued

**NONRESIDENT HUNTERS:**

1 bull by drawing permit only; Aug. 20—Oct. 10  
 up to 60 permits for bulls  
 will be issued in combination  
 with resident hunts

...

Units 7 and 14(C) lie entirely within the Anchorage-Matsu-Kenai Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Antlerless moose seasons must be reauthorized annually. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. The moose population will be healthier and more productive due to decreased stress levels associated with winter food shortages.

**BACKGROUND:** The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters, and sharp reductions during severe winters. The number of permits issued (Table 197-1) depends on the current population estimate and bull:cow ratios, while accounting for estimated winter mortality. A November 2023 aerial composition count of moose in the Twentymile, Portage, and Placer River drainages found 176 moose with a bull:cow ratio of 22 bulls per 100 cows and a calf:cow ratio of 21 calves per 100 cows. This is a slight decrease in overall numbers, but an increase in the calf:cow ratio when compared to the December 2021 count, which found 185 moose with a bull:cow ratio of 36 bulls per 100 cows and a calf:cow ratio of 19 calves per 100 cows. Permit numbers were increased in 2022 to reduce the number of moose in these valleys since they are susceptible to sharp declines during severe winters when the population is too high. Since 2016, harvest and roadkill numbers have also remained relatively steady.

Table 197-1. Moose harvest in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C), regulatory years 2019-2022.

Regulatory Year	Bull Permits	Antlerless Permits	Bulls Harvested	Cows Harvested
2019	30	30	13	10
2020	30	30	15	11
2021	30	30	14	9
2022	40	35	17	12

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to maintain antlerless hunts in Units 7 and 14(C). These hunts have been successful in creating additional moose hunting opportunities with little or no controversy. In addition, the harvest of antlerless moose has helped achieve the department’s goal of maintaining moose numbers at a level to avoid die-offs during harsh winters.

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

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**PROPOSAL 198 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B.

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

**WHAT WOULD THE PROPOSAL DO** This proposal would reauthorize the antlerless moose hunt for Kalgin Island in Unit 15B.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations as defined in 85.045 are:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(B), Kalgin Island 1 moose per regulatory year, by registration permit only	Aug. 20–Sept. 20	Aug. 20–Sept. 20

There is a negative IM finding for moose in Unit 15B.

There is a positive C&T finding for moose in Unit 15B (Kalgin Island) with ANS of two moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The antlerless moose season for Kalgin Island (RM572) in Unit 15B would be reauthorized. This hunt will help to maintain moose populations within sustainable levels on Kalgin Island, provide subsistence opportunity, maximize other harvest opportunity, and decrease the chance of high winterkill due to a lack of suitable forage.

**BACKGROUND:** Antlerless moose hunts must be reauthorized annually by the board. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest

antlerless moose with the goal of reducing the population to the management objective of 20-40 moose.

In response to concerns that the moose population on Kalgin Island had exceeded the island's carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective. Antlerless hunts, such as RM572, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat at this time.

During the most recent moose survey (February 2022), department staff counted 30 moose on Kalgin Island, with below optimal count conditions. In the last 10 years, an average of 92 permits were issued for this hunt; of which 86 permittees hunted, with an annual harvest of 30 moose. Though surveying this island is often challenging due to maritime weather and thick vegetation, harvest has remained stable with observed effort for the last 10 years.

The "any moose" registration hunt is recommended to reduce moose numbers on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access likely minimize the danger of overharvest. Additionally, if needed, the department can manage this permit hunt in-season, allowing for a change in the number of permits provided or closure of the hunt.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. This hunt helps to control the moose population on Kalgin Island to keep it within sustainable limits and provides additional harvest opportunity.

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

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**PROPOSAL 199 – 5 AAC 85.045.(a)(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 15C as follows:

This proposal would reauthorize the antlerless moose hunt in 15C (DM549) and the targeted hunt (AM550).

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would reauthorize the antlerless moose hunt for the Homer Bench and the targeted antlerless hunt along the Sterling Highway in Unit 15C.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations as defined in 85.045 are:



<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(C), that portion from the mouth of Deep Creek easterly along the south bank of Deep Creek to N 59° 55.183', W 151° 8.155'; then southeasterly in a straight line to the unnamed creek at N 59° 54.342', W 151° 6.459'; and easterly down the south bank of this stream to Caribou Lake and easterly along the south shore to the outlet of Fox Creek, then south along the west bank of Fox Creek to the mouth of Fox Creek, and along the mean high tide line to the point of origin

**RESIDENT HUNTERS:**

...

1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the nonresident drawing hunt: or	Oct. 20—Nov. 20
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------

...

1 moose by targeted permit only[,]	Oct. 15—Mar. 31
------------------------------------	-----------------

**NONRESIDENT HUNTERS:**

...

1 antlerless moose by drawing permit only; the taking of calves, and females accompa-	Oct. 20—Nov. 20
---------------------------------------------------------------------------------------	-----------------

nied by calves, is prohibited;  
up to 100 permits may be issued in  
combination with the resident  
drawing hunt

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only[,] Oct. 15–Mar. 31

There IM population objective for moose in Unit 15C is 2,500-3,500 and the IM harvest objective is 200-350 moose.

These hunts are within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The antlerless moose season within 15C (DM549) and the targeted hunt (AM550) along the Sterling Highway in 15C would be reauthorized for the 2023–2024 hunting season. This harvest may help minimize human–moose conflicts and winter kill deaths of moose due to limited habitat.

**BACKGROUND:** Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorization of the 15C cow hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in 15C for the 2023-24 hunting season.

In February 2023, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in a population estimate of 5,162 moose (95% CI: range 3,934–6,390), of which 22% (95% CI: 17–27) were calves. This equates to a density of approximately 4.4 moose/mi<sup>2</sup> in the census area and indicates the population has continued to grow since 2010. However, the spatial distribution of moose during winter is heavily skewed away from elevations > 1000 feet in Unit 15C. The creates high variance of moose abundance in grid cells and removal of a single high density grid cell from the GSPE census reduces the population estimate to 4,486 moose (95% CI: range 5,391–3581), of which 22% (95% CI: 14–28) where calves. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be at or above the upper end of the Intensive Management population objective. Fall composition counts in core count areas during November 2022 provided a bull ratio of 36 bulls:100 cows. Antlerless hunts, such as DM549 and AM550, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat at this time.

The lowlands in Unit 15C, south of Deep Creek and Caribou Lake, which encompasses the hunt boundary of DM549, contain high densities of moose when deep snow drives moose to lower elevations. The human population continues to grow in these areas doubling in size since the 1980's, according to U.S. Census Bureau statistics. In 2023, the hunt area was expanded to

reduce hunter conflicts with private property owners. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 25 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 63 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. Local residents are in favor of a limited antlerless moose harvest that provides additional opportunity and helps to limit habitat degradation and wildlife conflicts. Antlerless hunts are a useful tool to aid in achieving harvest objectives as set by the board.

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

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**PROPOSAL 200 – 5 AAC 85.045(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal reauthorizes the antlerless moose seasons for Unit 17A.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations for Unit 17A moose hunt allow resident hunters a bag limit of two moose per regulatory year under registration permits, however only one moose can be taken during the fall season. Nonresidents are restricted to a bag limit of one bull moose with antler restrictions by drawing permit.

- There are three fall hunts, one of which allows the harvest of an antlerless moose:
  - Registration permit (RM573), for resident hunters only with a bag limit of one bull moose, Aug 25–Sept 25;
  - Registration permit (RM571), for resident hunters only with a bag limit of one antlerless moose, Aug 25–Sept 25;
  - Drawing permit (DM570 - up to 20 permits are available), for non-resident hunters only, with a bag limit of one bull moose with 50” antlers or antlers with 4 or more brow tines on at least one side, Sept 5–Sept 15.

- There are two winter hunts, open to resident hunters only, one of which allows for the harvest of antlerless moose.
  - Registration permit (RM575), with a bag limit of one antlered bull moose;
  - Registration permit (RM576), with a bag limit of one antlerless moose.
    - Winter hunt season dates for the winter hunts are as follows: Jan 1– Feb 28.

The board made a positive customary and traditional use finding for moose in all of Unit 17 and found that 100–150 are reasonably necessary for subsistence.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would reauthorize the antlerless moose hunts in Unit 17A. These antlerless hunts would continue to provide hunters with additional harvest opportunity while helping managers by limiting the growth of the Unit 17A moose population that is already beyond the upper limit of our population objectives.

**BACKGROUND:** Moose are relative newcomers to much of Unit 17A, with only about 35 animals being present along the eastern border in 1980. Since then, moose have continued to increase in population size and expand throughout Unit 17A and west into Unit 18. Minimum counts of moose in Unit 17A were conducted in 14 different years during the period of 1991–2011, revealing a steady increase in moose numbers over time, with 1,166 moose counted in March 2011. During 2012–2015, surveys were not conducted due to inadequate snow conditions. Beginning in fall 2016, a Geospatial Population Estimator (GSPE) replaced the minimum count for enumerating moose in Unit 17A. In spring 2017, this survey technique produced an estimate corrected or sightability (1.2) of 2,370 moose, ( $\pm 563$ ). The 2022 uncorrected estimate was 1,990 moose ( $\pm 437$ ). The most recent survey conducted in October of 2022 estimated a total of 2,440 ( $\pm 251$ ) with an uncorrected estimate of 1,719 moose ( $\pm 144$ ). The GSPE technique largely depends on adequate snow coverage, but due to the coastal climate of 17A these weather patterns are unreliable. To meet these challenges Togiak National Wildlife Refuge shifted towards fall surveys to increase the likelihood of completion, with the caveat that sightability is decreased due to lack of snow. While the range is overlapping this slight decrease in point estimates (1,990 vs 1,719) is likely due to liberal winter seasons where cows are desired and available for harvest.

Moose management in Unit 17A has been guided by the Unit 17A Moose Management Group, consisting of members from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game advisory committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game. This group produced a Unit 17A Moose Management Plan that went through several iterations during 1996–2013, with the 2013 plan being used as the guiding document today. This plan has goals and objectives for hunter

opportunity, harvest allocation, habitat mapping and population monitoring. The population objective for Unit 17A listed in the plan is 800–1,200 moose.

A drawing hunt for nonresident hunters was adopted by the board in 2013, with fall 2014 being the first year of that hunt. The impetus behind the nonresident hunt was abundant harvest opportunity provided by this growing moose population, and objectives within the moose management plan that provide for the nonresident opportunity when the moose population exceeds 1,000 animals and is at a stable or increasing trend.

The winter antlerless hunt was adopted by the board and initiated in RY13 that allows for an antlerless harvest when the moose population is above 600 animals and is stable or increasing. During the last four complete years of the RM576 antlerless hunt (RY18–RY22), 239 antlerless moose have been taken (187 cows and 52 bulls), for an average of 37 cows/year. This is a significant increase from the previous five-year period (RY13–RY17) where an average of ~13 cows/year were harvested.

Because of the concerns with the increasing moose numbers in Unit 17A that are already well above population objectives, a proposal was adopted by the board during their spring 2018 meeting in Dillingham, to open a fall antlerless hunt in fall 2018 to increase harvest on the female segment of the population. During the first year of this hunt in fall 2018, eight antlerless moose were harvested; all were cows.

Additionally, travel conditions are the largest restriction to a successful winter hunt and due to the maritime climate, there is uncertainty when snow conditions will provide for sufficient transportation. Winter hunts RM575 and RM576 had been a may be announced for up to a 31-day season when conditions exist. In 2022 the BOG adopted set season dates of Jan. 1 – Feb. 28 to aid the Department in curbing this increasing moose population.

During RY2018–2022 the total moose harvest of 574 and the mean annual moose harvest in Unit 17 was ~109 moose per year.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. The moose population in this unit is above the upper limit of the population objective. Allowing a small harvest of antlerless moose will help limit population growth while providing additional harvest opportunity for hunters.

**COST ANALYSIS:** Adoption of this proposal would not result in significant costs to the department.

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Proposals 201-207

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**PROPOSAL 208 – 5 AAC 85.045 Seasons and bag limits for moose.** Relax the existing restrictions for RM682.

**PROPOSED BY:** Stony Holitna Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would make the following changes to the RM682 hunt: allow for proxy hunting, allow for more than one person per household to receive a permit, and extend the season by five days.

**WHAT ARE THE CURRENT REGULATIONS?** Currently proxy hunting is not permitted and only one person per household is allowed to obtain a permit. Season dates for this hunt are September 1-5.

There is a positive customary and traditional use finding for moose in Unit 19, that portion outside of the Lime Village Management Area (LVMA) with an Amount Reasonably Necessary for Subsistence (ANS) range of 400-700, including 175-225 in Units 19A and 19E, and 20-24 in Unit 19(B) (5AAC 99.025 (8)).

Units 19A and 19B have a positive Intensive Management (IM) finding with a population objective of 13,500 - 16,500 and a harvest objective of 750 – 950, and the board has Proposal 56 before them at the March 2024 board meeting to determine population and harvest objectives because Unit 19A was recently split into units 19A and 19E.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal were adopted, hunters would be able to proxy hunt for eligible individuals, multiple members of the same household could obtain a permit, and the season would be extended to September 10<sup>th</sup>.

**BACKGROUND:** In 2006 the board determined there was no harvestable surplus in Unit 19E and closed moose hunting, with the exception of the TM684 hunt area in the LVMA. This closure lasted until March 2019, when the board reopened a 5-day season under registration hunt RM682. Since that time, moose numbers have slowly increased in the RM682 hunt area. In a March 2023 geospatial population estimator (GSPE) survey, the department estimated approximately 2,700 moose (0.8 moose/mi<sup>2</sup>). The current average 2-year bull:cow ratio is 44:100.

The board opened RM682 in a conservative fashion, including multiple restrictions found in board findings 2019-225-BOG. These included no proxy hunting and only one permit per household.

An average of 16 hunters have harvested seven moose per year since 2019. This harvest takes place almost entirely within the bear control focus area (BCFA) where the harvestable surplus is approximately 60 moose. The BCFA encompasses portions of the Holitna River and the Kuskokwim River between Sleetmute and Stony River. This area has the highest densities of moose, as well as the best access for boaters.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of this proposal and **SUPPORTS** the longer season as there are additional moose available to harvest. The Stony Holitna AC supports these changes as a way to increase opportunity, however they would like to see the hunt continue to be managed in a conservative fashion. If adopted, the board will need to modify the findings in 2019-225-BOG to allow for proxy hunting as well as the issuance of more than one permit per household.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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Proposal 209

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**PROPOSAL 210 – 5 AAC 92.450. Description of game management units.** Change the subunit boundary of Units 20A and 20C to the current river channel as follows:

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

**WHAT WOULD THE PROPOSAL DO?** This proposal would address a change that has occurred in the location of the main channel of the Nenana River that affects the border between Units 20A and Unit 20C. The proposed language clarifies that Seventeen Mile Slough and Lost Slough are channels of the Nenana River and therefore define the western boundary of Unit 20A and the eastern boundary of Unit 20C.

**WHAT ARE THE CURRENT REGULATIONS?**

5 AAC 92.450(20)

(A) Unit 20(A) consists of that portion of Unit 20 bounded on the south by the Unit 13 boundary, bounded on the east by the west bank of the Delta River, bounded on the north by the north bank of the Tanana River from its confluence with the Delta River downstream to its confluence with the Nenana River, and bounded on the west by the east bank of the Nenana River.

...

(C) Unit 20(C) consists of that portion of Unit 20 bounded on the east by the east bank of the Nenana River.

The portion of units 20A and 20C affected by the proposal are outside of the Fairbanks Nonsubsistence Area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would clarify the boundary descriptions of the Units 20A and 20C boundary that is currently depicted incorrectly in the Alaska Hunting Regulations. The map in the Alaska Hunting Regulations depicts the boundary of Unit 20A and 20C to a channel of the Nenana River that does not exist. This proposal would eliminate confusion for hunters that hunt in this area and aid law enforcement.

**BACKGROUND:** The intent of the regulation is that the Nenana River is the border between Game Management Units 20A and 20C. The main channel of the river has moved since the existing boundary was adopted by the board and since maps were labeled. As a result, the USGS map and the map in the Alaska Hunting Regulations depict a boundary where the Nenana River no longer exists. Correcting this issue would increase opportunities for both moose and grizzly bear hunters, as well as making the hunt regulations clearer for the public and law enforcement.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal because it addresses a discrepancy in the Alaska Hunting Regulations and eliminates confusion about the Unit 20A and Unit 20C border.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 211 – 5 AAC 85.040 and 5 AAC 92.050.** Change the hunt area boundary for Unit 1A goat hunt RG002 and accompanying permit issuance requirements.

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

**WHAT WOULD THE PROPOSAL DO?** The RG002 boundary would be expanded so it was the same as RG001 and both hunt units will include Unit 1A remainder and Unit 1B remainder. This allows the department to create a clear distinction between a nonresident hunt (RG001) and a resident hunt (RG002).

**WHAT ARE THE CURRENT REGULATIONS?**

5 AAC 85.040(a)(1)

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Remainder of Unit 1(A)		



RESIDENT HUNTERS: 2 goats  
by registration permit only; the  
taking of nannies with kids is  
prohibited

Aug. 1 – Dec. 31

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

Aug. 1 – Dec. 31

5 AAC 92.050(a)(4)

(K) a second mountain goat registration permit for the Remainder of Unit 1(A) may only be issued if the goat harvested with the first registration permit was a billy harvested in the Remainder of Units 1(A); for those hunters who harvested their first goat in the Remainder of Unit 1(A) with a registration permit, the pursuit of a second goat cannot occur in the trend count area of the original harvest; resident hunters looking to pursue a second goat in the Remainder of Unit 1(A) with a registration permit may receive a second registration permit after presenting the harvest record or sealing documents from their first harvest to the ADF&G office in Ketchikan.

The proposed boundary change lies entirely outside of the Ketchikan Nonsubsistence Area (KNSA). The board made a positive Customary and Traditional use finding for goats in Unit 1(A) outside of the KNSA and established an amount reasonably necessary for subsistence of 5-10 animals.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Changing the boundary of the new two-goat bag limit hunt, RG002, to align with the existing RG001 hunt area will reduce hunter confusion and regulatory complexity. The bag limit in Unit 1B remainder would increase to 2 goats.

**BACKGROUND:** During the 2023 Board of Game meeting in Ketchikan, the Board adopted Proposal 43. The proposal allowed for a second goat to be harvested by resident hunters in a portion of Unit 1A. The proposer intended for the proposal to apply to the entire RG001 hunt area, however as written the proposal only applied to Unit 1A. The Board did not amend the proposal, and the new hunt opportunity was implemented in a way that has caused confusion and increased regulatory complexity. Under the new regulation, RG002 does not include a small portion of Unit 1B from the northwest border of the hunt area to the Bradfield Canal (Figure 1 and 2). Resident hunters who may be hunting near the border of the existing hunts must carry two permits and ensure they are complying with the correct permit conditions depending on which side of the mountain they harvest a goat from. Resident hunters hunting their second goat

with an RG002 permit must be extremely careful to harvest their second goat from the RG002 side of the ridge.

Hunting pressure near the Unit 1A and 1B border has decreased through time. Multiple factors contributed to decreased hunting pressure in the area including opening of a hunting season for goats on Revillagigedo Island and decreasing goat populations. Goats were introduced to Revillagigedo Island in 1983. The first hunting season for Revillagigedo opened during regulatory year 1993 when goat populations increased to a level that could sustain harvest. Because of this, hunters were able to access goats closer to Ketchikan which decreased costs associated with transportation therefore reducing hunting pressure on the mainland (Figure 3). Goat populations have also decreased since the 1980's which may also have contributed to hunters' decision to hunt in a different location (Figure 4 and 5). With a lack of hunting pressure in the area it is not likely that increasing the bag limit in Unit 1B remainder would increase pressure to a level causing concern for the population. However, managers must monitor this location closely to assure sustainable harvest to avoid future decreases in the population.

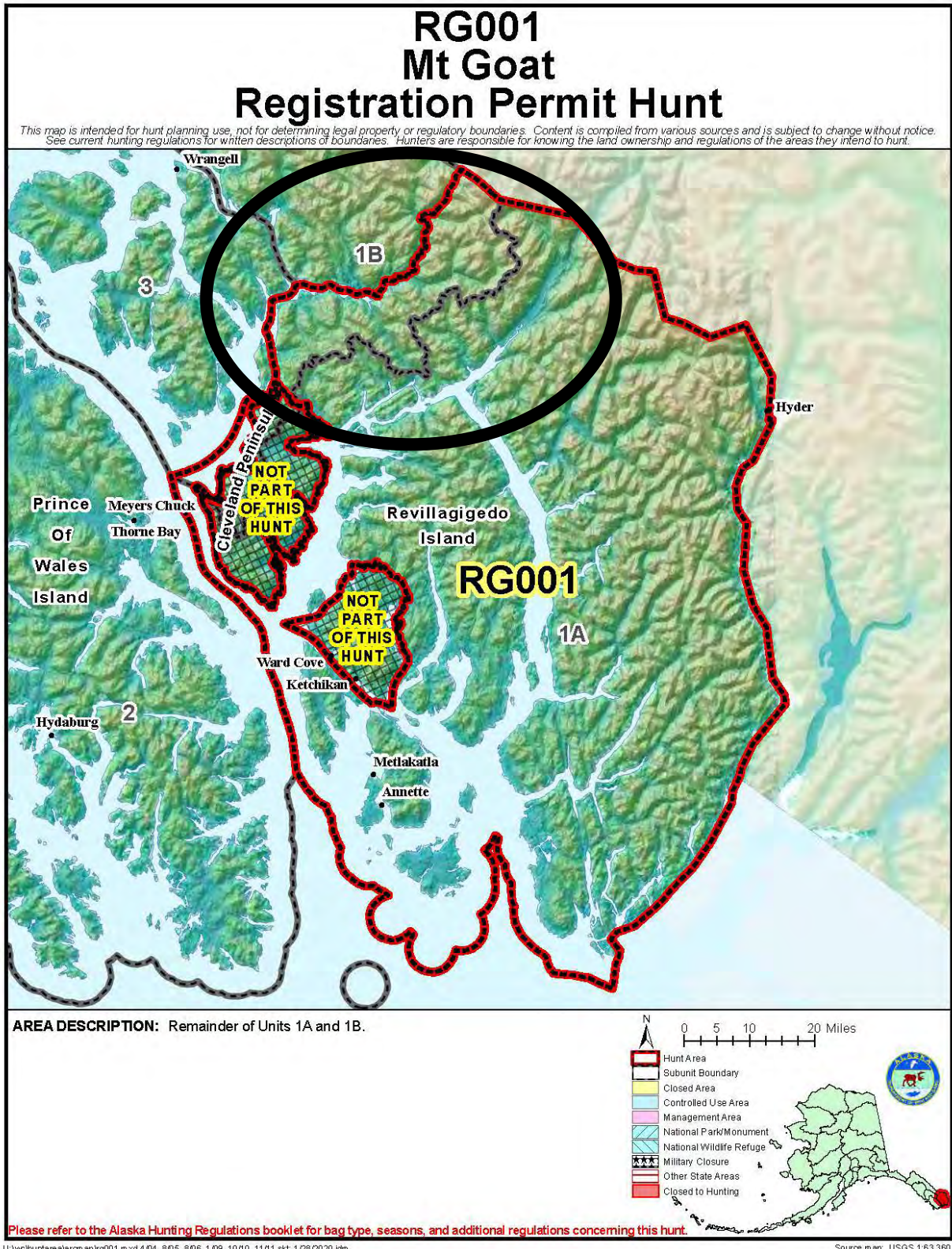


Figure 1. RG001 hunt boundary that includes Unit 1A remainder and Unit 1B remainder. Black circle indicates the location of hunt boundary differences between RG001 and RG002.

# RG002 Mt Goat Registration Permit Hunt

This map is intended for hunt planning use, not for determining legal property or regulatory boundaries. Content is compiled from various sources and is subject to change without notice. See current hunting regulations for written descriptions of boundaries. Hunters are responsible for knowing the land ownership and regulations of the areas they intend to hunt.

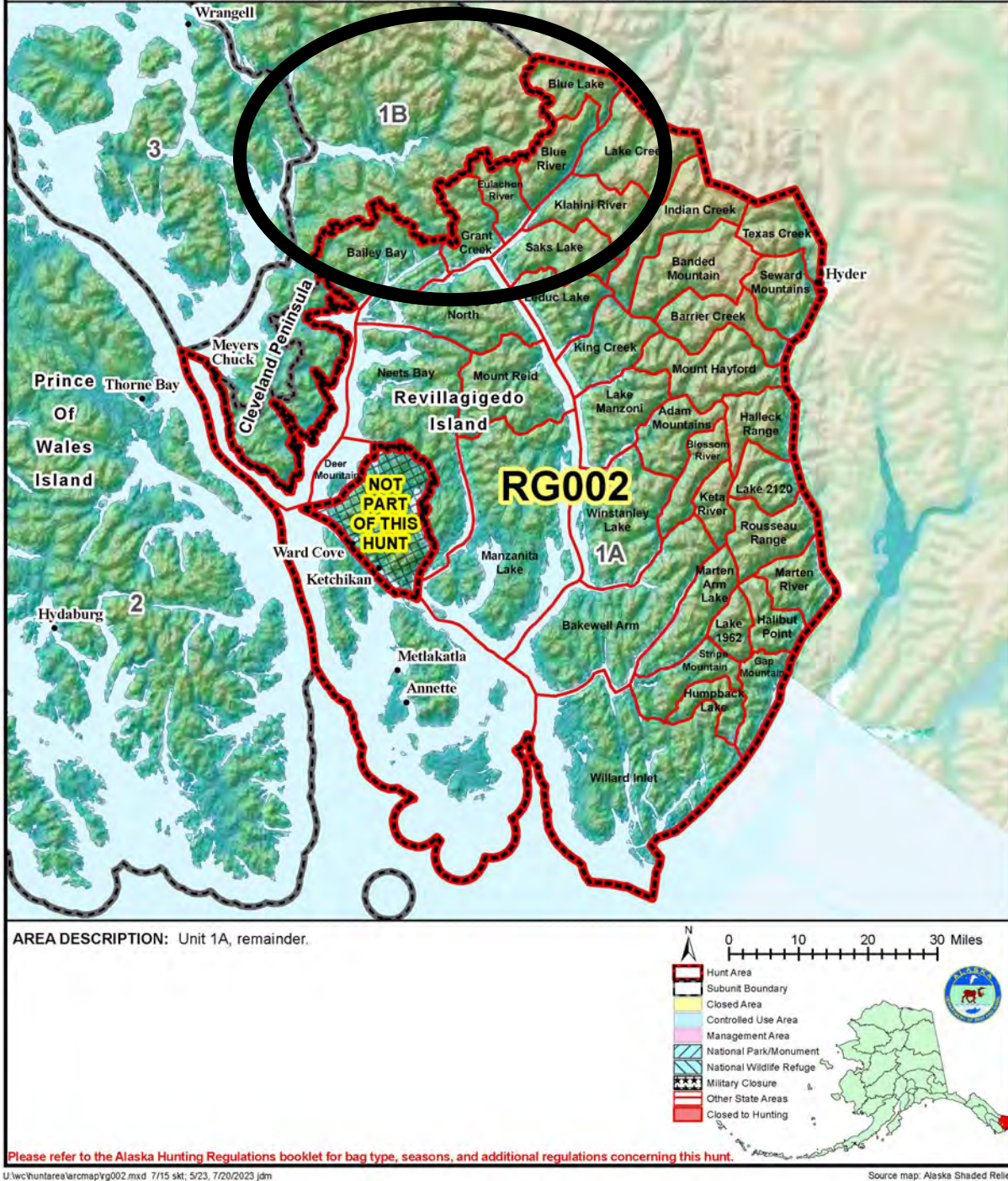


Figure 2. RG002 hunt boundary that currently only includes Unit 1A remainder. Black circle indicates the location of hunt boundary differences between RG001 and RG002.

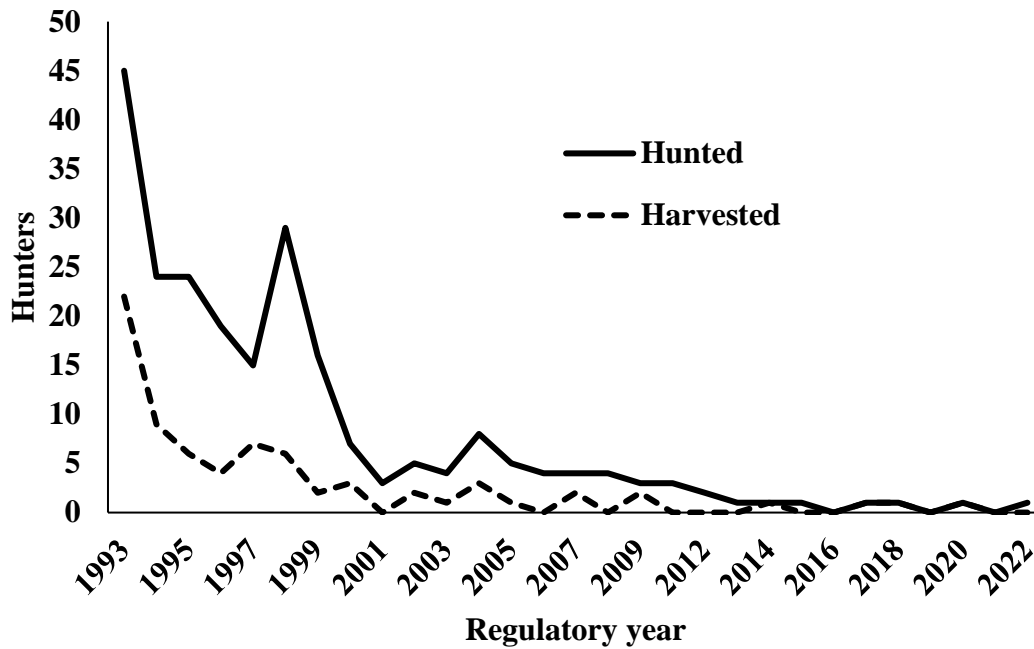


Figure 3. Hunter participation and harvest near the border of Game Management Units 1A and 1B north of the divide between Santa Anna Inlet and Yes Bay to the Canadian border, Alaska.

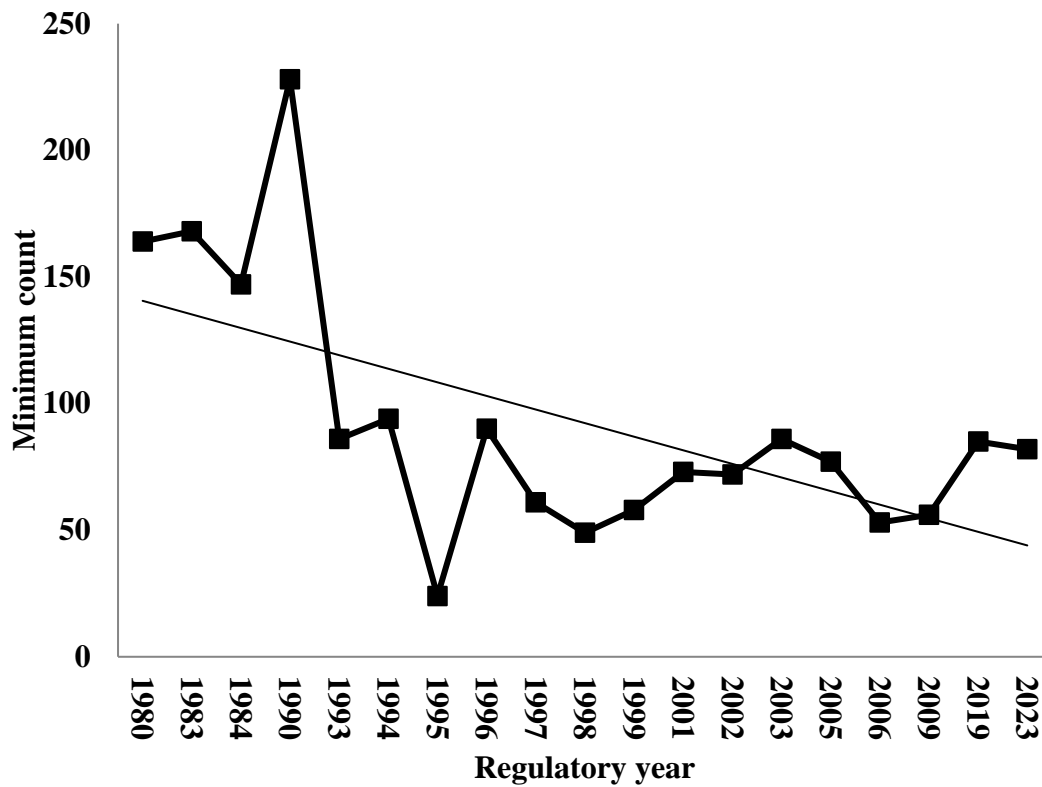


Figure 4. Minimum counts of mountain goats in the Bailey Bay hunt zone, Game Management Unit 1A, Alaska.

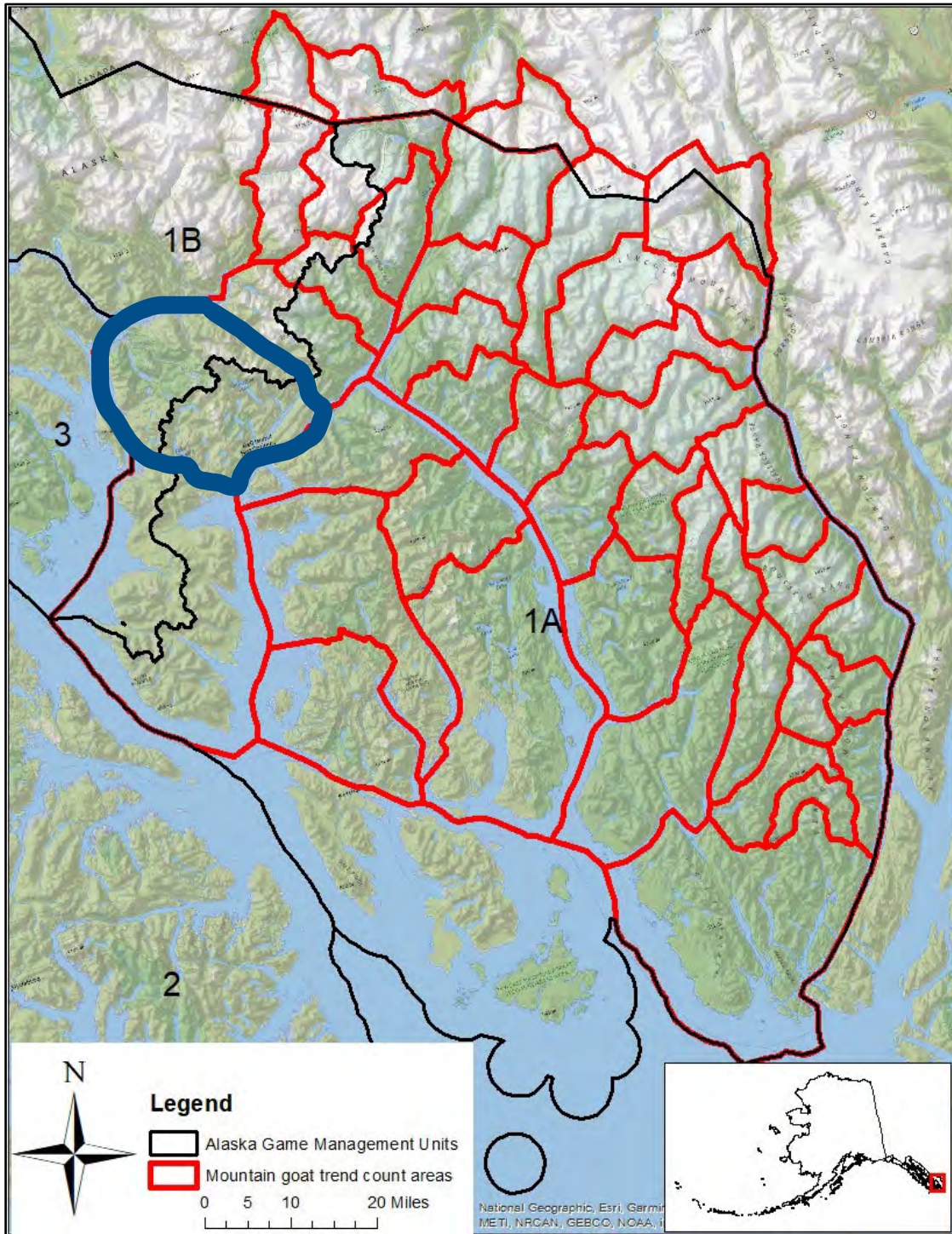


Figure 5. Bailey Bay hunt zone within Game Management Unit 1A, Alaska. Area highlighted in blue.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal as it would reduce hunter confusion and regulatory complexity. Expanding the border of RG002 to

align with RG001 would allow hunters to hunt from the Unuk River to the Bradfield Canal without having to worry about which regulations to comply with depending on which side of the ridge they are on. It would also simplify the regulations by having one registration permit for non-residents (RG001) and one for residents (RG002). The bag limit for Unit 1B remainder would increase to 2 goats, however, the department does not anticipate conservation concern with this change.

The department also recommends the board AMEND the proposal by changing language in 5AAC 92.050(a)(4) from "...the pursuit of a second goat cannot occur in the trend count area of the original harvest;..." to "...the pursuit of a second goat cannot occur in the **hunt zone** of the original harvest;..." to be consistent with the language the department uses to describe smaller hunt areas across Southeast Alaska.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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