

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS
CENTRAL / SOUTHWEST REGION PROPOSALS
ALASKA BOARD OF GAME MEETING
WASILLA, ALASKA
JANUARY 10-17, 2025



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, January 10-17, 2025 in Wasilla, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

PROPOSAL 1 – 5 AAC 92.015. Brown bear tag fee exemption. Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region IV.

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 for brown bear 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 supports 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.

PROPOSAL 2 - 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. 5 AAC 95.052. Discretionary permit hunt conditions and procedures. Establish a second bear baiting season in Units 9, 11, 13, 14A&B, 16, and 17 where baiting is legal.

PROPOSED BY: Bethel Advisory Committee

WHAT WOULD THE PROPOSAL DO? Establish brown bear baiting opportunity in Units 9 and 17 and create a second bear baiting season of July 1–October 15 for brown and black bear in Units 9, 11, 13, 14A, 14B, and 17. There would be no change in Unit 16 as there are currently 2 bear baiting seasons with a fall season date of July 1–October 15 in that area.

WHAT ARE THE CURRENT REGULATIONS? The current black and brown bear baiting regulations for the Central-Southwest Region (Region IV) can be found in 5 AAC 92.044 and in the *2024–2025 Alaska Hunting Regulations* on pages 26–27.

The board has made a positive customary and traditional use (C&T) finding for black bear in Units 11 and 13 with an amount reasonably necessary for subsistence (ANS) of 20–50 bears and a positive C&T for black bear in Unit 16B with an ANS of 15–40 bears. For brown bear, there are positive C&T findings in Units 9B (ANS = 10–20), 9E (ANS = 10–15), 17A and portions of 17B (ANS = 5), and in portions of 17B&C, 19A, B, & D with a combined ANS of 10–15 bears.

The current bear baiting seasons in Units 9 (black bear only), 11, 13, and 14A and 14B are April 15–June 30, and April 1–May 31 in Unit 17 (black bear only). The Unit 16 bear baiting season is currently July 1–October 15 and April 15–June 30 for both species. Brown bears can be taken at bear bait stations only in Units 11, 13, 14A, 14B, and 16 (not Units 9 and 17). The majority of

resident and nonresident opportunities in Unit 9 are through registration permits offered only in the fall of odd-numbered years and spring of even-numbered years.

Bear may be taken the day you have flown in Units 9, 11, 13, 14A&B, 16, and 17, provided you are 300 feet from the airplane (not allowed on NPS lands).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Additional bear baiting opportunities would increase across Region IV where baiting is currently legal, and where land status allows, with a second season of July 1–October 15. The adoption of this proposal could result in an increase in the harvest of brown bears. The continued protection of cubs and sows with cubs suggests that increased bear harvest is not likely to create a conservation concern. There is the potential for user conflicts and/or increased incidental human-bear interactions in areas of high fall hunting activity or development such as in Units 13 and 14. Unit 9 is managed for trophy bear hunting and bear viewing and guided by a bear management policy that does not allow baiting opportunities that target coastal brown bears. Land status will dictate where bait stations can be placed as there is considerable federal and private land in Region IV. Registered guides operating in these areas will be able to establish up to 10 additional sites in their guide areas in the fall.

BACKGROUND: Black bear and brown bear populations across Region IV are healthy and little to no conservation concerns exist. Harvest of black bears at bait stations in Region IV represents 75% of the total annual take in spring, and 18% in fall. Harvest of brown bears at bait stations in Region IV represents 40% of the total annual take in the spring, and in Unit 16 where it is allowed in the fall it represents 3% of the total annual take (Table 2-1).

In some remote areas of the region, subsistence users have expressed concern that travel conditions are often not conducive to gain access to their bear baiting sites in spring. Establishing and monitoring a bear bait station takes a considerable amount of work and participation in remote areas of the region is historically low.

The department is actively removing brown and black bears from a very small portion of Units 17, 18 and 19 to benefit the Mulchatna Caribou herd under intensive management.

Table 2-1. Average annual take of bears by unit and percent of harvest taken through baiting in Region IV, calendar years 2019–2023.

Unit	Spring Bait	Fall Bait	Black Bear Harvest	% Black bear Harvest at Bait	Brown bear Harvest	% Brown bear Harvest at Bait
9*	x		3.2	0.6	109	-
11	x		4.0	2.8	6.5	3.6
13A	x		1.4	0.6	11.8	3.0
13B	x		0.5	0.3	13.0	4.4
13C	x		1.3	0.7	6.5	1.8
13D	x		18.5	13	11.9	14.4

13E	x		4.6	2.0	23.5	9.2
14A	x		30.1	17.8	4.3	4.4
14B	x		3.8	1.5	4.9	2.8
16A	x	x	27.4	18.4	10.4	6.3
16B	x	x	86.9	54	34.9	12.7
17A*	x		0	0	5.1	-
17B*	x		1.9	0	27.4	-
17C*	x		0.1	0.0	10.0	-

* No take of brown bears allowed at bait stations.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this method and means proposal. The proposal provides an increase in subsistence opportunity and will likely lead to an increase in the take of both black and brown bears in Region IV where baiting is allowed.

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

PROPOSAL 3 – 5 AAC92.044.(b)(13). Permit for hunting bear with the use of bait or scent lures. 5 AAC 92.080 (7)(G)(H). Unlawful methods of taking big game; exceptions. Allow use of cellular cameras for taking black and brown bear over bait in Units 9, 11, 13, 14A&B, 16, and 17.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? Allow the use of cellular cameras, including game cameras, for the taking of bears at bait stations where the same-day-airborne take of bears is currently allowed from April 15 to June 30. This would include Units 9, 11, 13, 14A&B, 16, and 17 for black bear and in Units 11, 13, 14A&B, and 16 for brown bears.

WHAT ARE THE CURRENT REGULATIONS? The current black and brown bear baiting regulations for the Central-Southwest Region (Region IV) can be found in 5 AAC 92.044 and in the *2024–2025 Alaska Hunting Regulations*. Current bear baiting seasons in Units 9, 11, 13, 14A&B are April 15–June 30, and April 1–May 31 in Unit 17. Unit 16 has an additional fall baiting from July 1–October 15.

5 AAC 92.080. Permit for hunting bear with the use of bait or scent lures.

The following methods of taking game are prohibited:

...

(7) with the aid of

...

(G) any device that has been airborne, controlled remotely, or communicates wirelessly, and is used to spot or locate game with the use of a camera or video device;

(H) any camera or other sensory device that can send messages through wireless communication;

....

5 AAC 92.044(b)(13). Unlawful methods of taking big game; exceptions.

In Units...9,...11,...13, 14(A)&(B),...16, and 17...a hunter who has been airborne may take or assist in taking of a black bear at a bait station with the use of bait or scent lures under a permit issued by the department, and if the hunter is at least 300 ft. from the airplane at the time of taking; in Units...11,...13, 14(A)&(B),...16,...a hunter who has been airborne may take or assist in taking of a brown bear at a bait station with the use of bait or scent lures under a permit issued by the department, and if the hunter is at least 300 ft. from the airplane at the time of taking;

...

Black bear			Brown bear		
Unit 9	no finding		Unit 11	negative	--
Units 11 and 13	positive	20-50	Unit 13	negative	--
Units 14 A-B	Nonsubsistence area				
Units 16A	Nonsubsistence area				
Unit 16B	positive	15-40	Unit 16B	negative	--
Unit 17	negative	--			

The Board of Game has made a positive customary and traditional use (C&T) finding for black bear in Units 11&13 with an amount reasonably necessary for subsistence (ANS) of 20–50 bears and a positive C&T for black bear in Unit 16B with an ANS of 15–40 bears. No finding has been made for black bear in Unit 9 or Unit 14 (within the nonsubsistence area), and a negative finding has been made in Unit 17. For brown bear the board has made negative C&T findings in Units 11, 13, and 16B, and Units 14 and 16A are within the nonsubsistence area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, bear baiters in the affected units would be able to use game cameras that communicate wirelessly to locate, identify, and monitor activity at bait stations. This may lead to a greater level of selectivity and a more efficient take of bears. It is unclear if this will result in an increase in take of bear in these units but there are currently no conservation concerns for black or brown bears in Region IV.

BACKGROUND: Establishing and hunting a bear bait station takes a considerable amount of work to monitor and maintain. Regulations addressing the use of electronic communication devices were designed to ensure fair chase. Currently hunters are not allowed to use any camera or sensory device that has been airborne, controlled remotely, or communicates wirelessly, and is used to spot or locate game when engaged in hunting and or bear baiting.

The existing prohibition on the use of game cameras that can transmit photos wirelessly and wireless communication, was adopted by the board at the Statewide Regulations meeting in November 2017, as a result of the board passing a proposal submitted by the Alaska Wildlife Troopers (AWT). AWT submitted the proposal because game cameras that could communicate wirelessly were a new technology the board had not address previously. The board chose to prohibit their use at that meeting, statewide.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the use of cellular cameras to aid in the taking of bears at bait stations where same-day-airborne take is allowed. This is a methods and means proposal. If the board wants to allow the use of this equipment, the department suggests that this be allowed statewide for consistency of regulations.

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

PROPOSAL 4 – 5 AAC 85.055. Seasons and bag limits for Dall sheep. Create an archery-only Dall sheep season in Units 9, 11, 13, 14A, and 14B under a general season harvest ticket.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would create archery-only Dall sheep hunts in general season hunt areas of Units 9, 11, 13, 14A, and 14B (or limited to a specific combination of areas if managers see fit), using a general season harvest ticket for full-curl sheep from August 6–9 or July 21–31.

WHAT ARE THE CURRENT REGULATIONS? The current sheep hunting regulations can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*.

General season opportunity for all residents and nonresidents in Units 9, 11, 13, and 14A&B are as follows:

- Resident and nonresident hunters may hunt using general season harvest tickets in most of the region during August 10–September 20 to harvest 1 full-curl ram.
- Nonresident hunters may harvest 1 full-curl ram every 4 regulatory years.
- Resident and nonresident youth aged 10–17 accompanied by an adult may hunt most of the area using general season harvest tickets during August 1–5. The bag limit counts against the accompanying resident adult. Hunter education is required for the participating youth.
- Nonresident hunters require a guide or a resident relative aged 19 years or older within second degree of kindred.

- From August 10–September 20 aircraft may only be used by and for sheep hunters to place and remove hunters and camps, maintain existing camps, and salvage harvested sheep. A person may not use or employ an aircraft to locate sheep or direct hunters to sheep during the open sheep hunting season.

Harvested rams must be sealed within 30 days of kill.

The board made a positive C&T finding for Dall sheep in Unit 11 and determined the amount reasonably necessary for subsistence at 60-75 sheep. The board made a negative C&T finding for Dall sheep in Unit 13, but has not made a finding for sheep in Unit 9 or Unit 14 (which is fully within the Anchorage-Mat Su-Kenai nonsubsistence area).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal creates an archery-only sheep season for residents and nonresidents in Units 9, 11, 13, and 14A&B with a season of August 6–9 (or July 21–31). The new season would not overlap the youth sheep hunt (August 1–5) which is not weapons restricted. This proposal is not likely to affect sheep populations because the current full-curl bag limit under the general season adequately guards against overharvest. Allocating additional hunting opportunity could increase sheep harvest, but it is difficult to predict how many hunters will participate in the hunt and how successful they will be. Hunters participating in the archery-only hunt would not be affected by the aircraft restriction pertaining to locating sheep but would be required to wait until 3am the day following flying to harvest a ram. There is a proposal by the same author to address scouting for sheep prior to August 10.

BACKGROUND: The Central-Southwest Region (Region IV) has both full-curl and any-ram hunting opportunities by harvest ticket or drawing permit. The full-curl bag limit provides maximum participation in sheep hunts and has not been linked to any negative effects on the sheep population or lamb production. Some sheep hunts have season dates and bag limits that provide a reasonable opportunity for success in harvesting a sheep for subsistence uses.

Outside of the youth season over half of the annual total sheep harvest occurs in the first 10 days of the season with most of this occurring in the first 5 days. Annual ram harvest in the proposed units is detailed in Table 4-1.

Table 4-1. Total Dall sheep ram harvest in Region IV by unit, excluding harvest under federal permits, RY2019–2023.

Reg. Year	Unit 9	Unit 11*	Unit 13*	Units 14A&B	Total	Annual Avg.
2019	0	71	81	35*	187	47
2020	1	60	53	23*	137	34
2021	0	48	43	22*	113	28
2022	0	46	40	23*	152	38
2023	0	31	48	11	119	29
Average	-	66	53	23	142	35

* Take includes any-ram harvest.

Dall sheep populations throughout Region IV are considered stable with some variability. A recent decline was observed in portions of the Chugach and Talkeetna mountains (Unit 13), largely due to harsh winter conditions with high avalanche danger during the winter of 2019/20 and difficult winter conditions in subsequent years. Portions of the Wrangell Mountains (Unit 11) have had stable sheep populations and have also had an increase in hunting pressure, while other portions of the Wrangell Mountains have experienced declines similar to those seen in the Talkeetnas and the Alaska Range. Many units are experiencing a decline in harvest some of which is due to regulatory changes such as in the Chugach Mountain portion of Unit 14A which went from an any-ram draw to full-curl .

In 2016, the board passed a prohibition on the use of aircraft from August 10–September 20 (5 AAC 92.085(8)). Aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep. If this proposal were to be adopted as written, archery-only sheep hunters would be allowed to use aircraft for spotting and locating sheep. This could give an advantage to archery hunters which could result in user conflicts and increased harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of sheep hunting opportunity between archers and hunters who use other methods of taking sheep but **OPPOSED** the proposed July hunt dates. The department conducts sheep surveys in the summer months after snow has melted and before the hunting season. The department regularly struggles to get sheep surveys concluded before sheep hunters are in the field, and adding a hunting season in the month of July would even further restrict the department’s ability to conduct sheep surveys. No biological concerns are addressed or created by this proposal because the requirement to harvest full-curl rams should prevent overharvest from affecting sustainability of sheep populations. If adopted, the board should determine that the new regulations continue to provide a reasonable opportunity for success in customary and traditional uses of Dall sheep in Unit 11.

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

PROPOSAL 5 – 5 AAC 85.025(a)(4). Hunting seasons and bag limits for caribou. Reduce the nonresident bag limit for caribou in Unit 9D from 2 bull caribou to 1 bull caribou.

PROPOSED BY: Jordan Wallace

WHAT WOULD THE PROPOSAL DO? The proposal changes the caribou bag limit for nonresidents in Unit 9D from 2 bulls to 1 bull.

WHAT ARE THE CURRENT REGULATIONS?

	Resident Open Season (Subsistence and General hunts)	Nonresident Open Season
(4)		
Unit 9(D)		
If the harvestable portion is 99 caribou or less:		
RESIDENT HUNTERS: 1 caribou by Tier II subsistence hunting permit only;	Aug. 1 - Sept. 30 (Subsistence hunt only) Nov. 15 - Mar. 31 (Subsistence hunt only)	
NONRESIDENT HUNTERS:		No open season.
If the harvestable portion is greater than 99, but less than 151 caribou:		
RESIDENT HUNTERS: 1 caribou by registration permit only	Aug. 1 - Sept. 30 Nov. 15 - Mar. 31	
NONRESIDENT HUNTERS:		No open season.
If the harvestable portion is greater than 150, but less than 251 caribou:		
RESIDENT HUNTERS: 2 caribou	Aug. 1 - Sept. 30 Nov. 15 - Mar. 31	
NONRESIDENT HUNTERS: 2 bulls		Aug. 1 - Sept. 30
If the harvestable portion is greater than 250, but less than 451 caribou:		
RESIDENT HUNTERS:		

3 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 450,
but less than 551 caribou:

RESIDENT HUNTERS:

4 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 550

RESIDENT HUNTERS:

5 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

The harvestable portion of the herd is greater than 250 but less than 451; the resident bag limit is 3 caribou and the nonresident bag limit is 2 bulls.

There is a positive customary and traditional use finding in Unit 9D and Unit 10, the South Alaska Peninsula Herd) with an Amount Reasonably Necessary for Subsistence (ANS) of 100-150 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were to be adopted there would be a decrease in hunting opportunity for nonresidents and as a result, a decrease in harvest.

BACKGROUND: The Southern Alaska Peninsula caribou herd (SAP) in Unit 9D (Figure 5-1) has fluctuated in population levels from 500 to more than 10,000 caribou over the last 4 decades (Figure 5-2). The current population objective is 1,500–4,000 caribou with a harvest objective of 150–200 caribou. The current population estimate is 4,000 after a minimum count was conducted in July 2024. Poor nutrition, predation by wolves and brown bears, and human-induced harvest

are thought to be the main causes of the decline in the 1980s and early 1990s. By 2002, the herd increased to 4,100 caribou but declined rapidly to approximately 700 caribou in 2007; in response, state and federal hunts were closed again. Predator control of wolves was conducted in 2008–2010 when it was determined that predation was the main cause of calf mortality. Department removal of wolves on the calving grounds increased calf survival from less than 1% in 2007 to 64% in 2008. After wolf control, population size, calf-to-cow ratio, and bull-to-cow ratios increased rapidly, and a Tier II and federal hunt were reinstated in 2013. With an increasing herd population, the board liberalized hunting for residents, eliminating the Tier II and changing the bag limit from 1 bull to 1 caribou in 2016. The board also created a nonresident hunt with a bag limit of 1 bull. In 2018, the bag limit changed to 2 caribou for residents and 2 bulls for nonresidents. In 2020, the bag limit increased to three caribou for residents and stayed at two bulls for nonresidents.

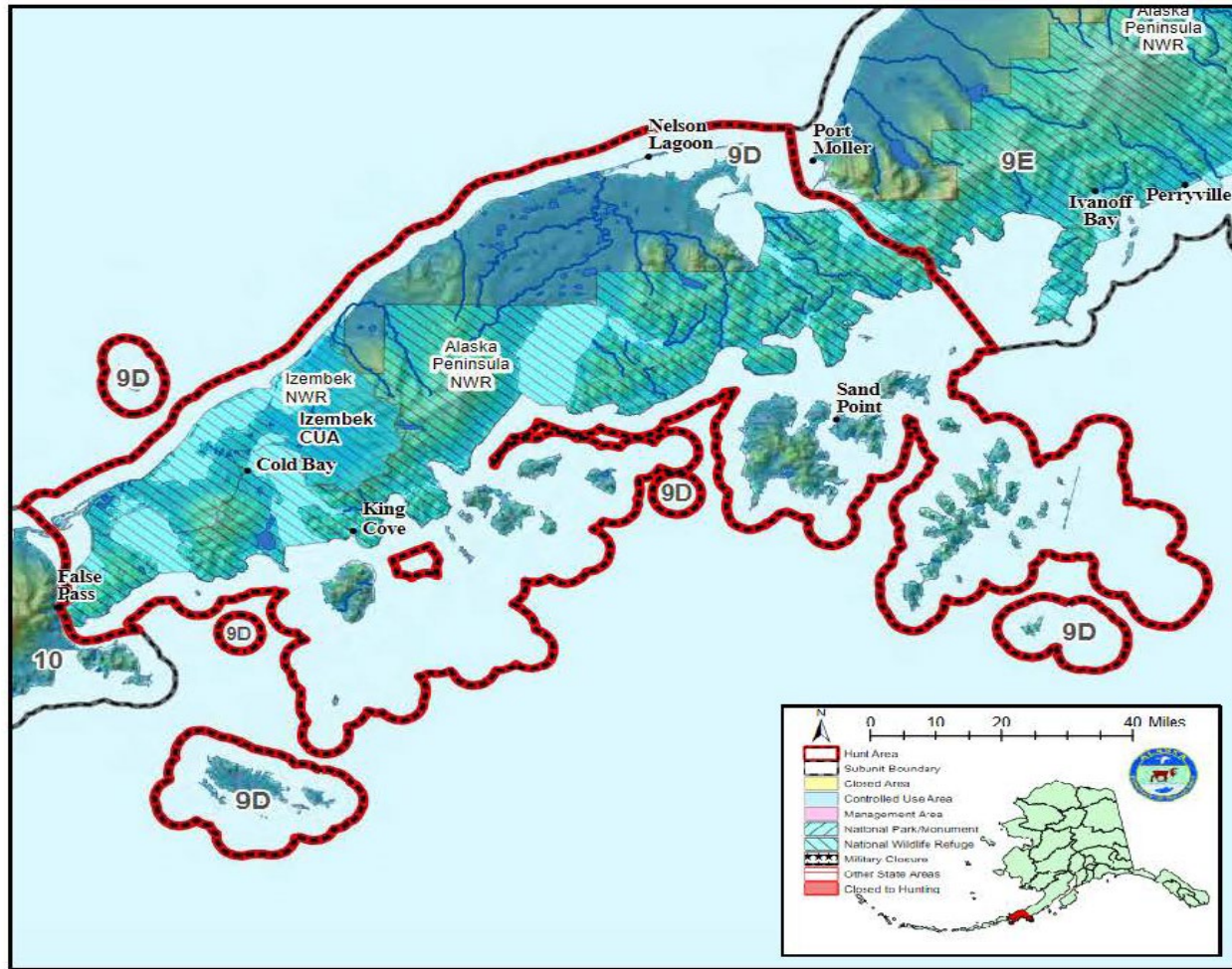


Figure 5-1. Southern Alaska Peninsula caribou herd range within Unit 9D.

Current population estimates and composition survey data indicate a harvest of more than 300 caribou per year is needed to maintain the 4,000 caribou objective. Additional caribou harvest above 300 is required to reduce the population so that it is within the population objective. Reported caribou harvest increased from 18 caribou in 2013 to 80 bulls harvested in 2023 by primarily nonresident hunters (Figure 5-3). However, harvest objectives are not being met. Cow harvest is negligible and has averaged 2 cows per regulatory year with zero cows harvested some years. After an initial spike in the number of resident hunters in 2020 after the bag limit was further liberalized, the number of resident hunters has declined while the number of nonresident hunters has increased (Figure 5-4).

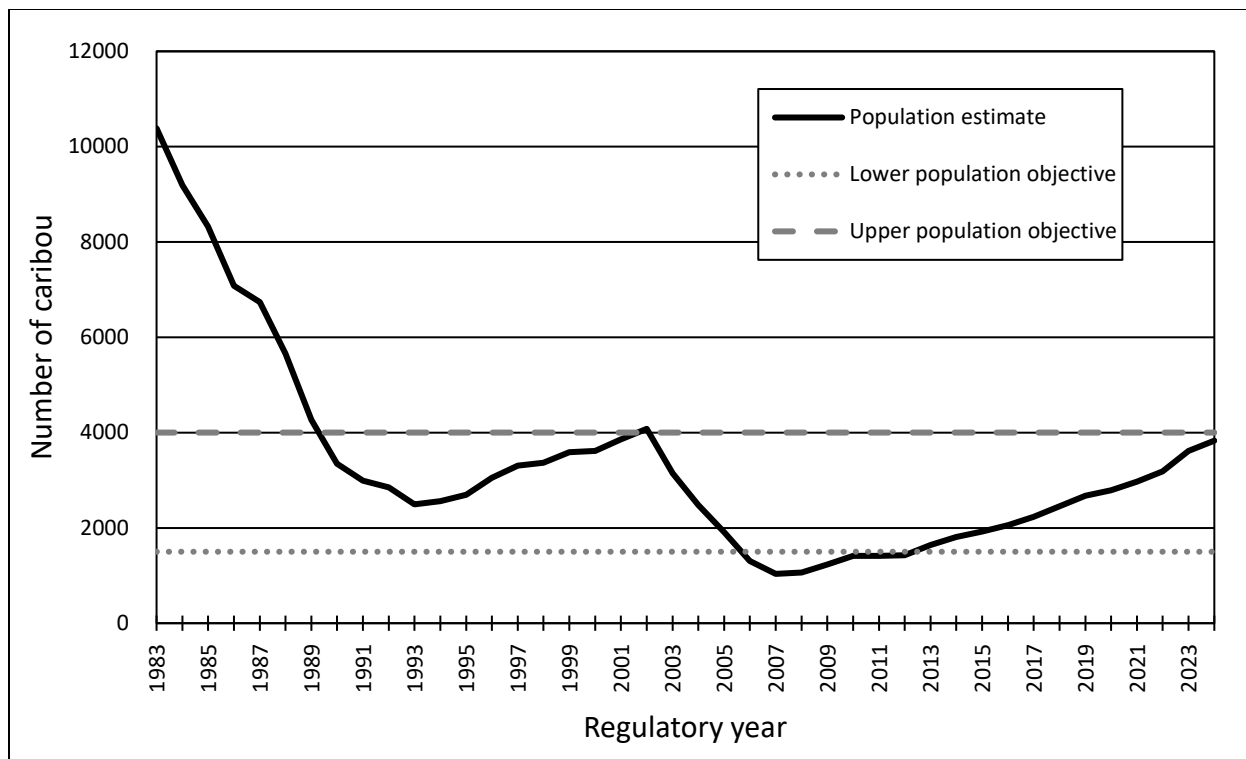


Figure 5-2. Population estimates for the Southern Alaska Peninsula caribou herd, regulatory years 1983–2024.

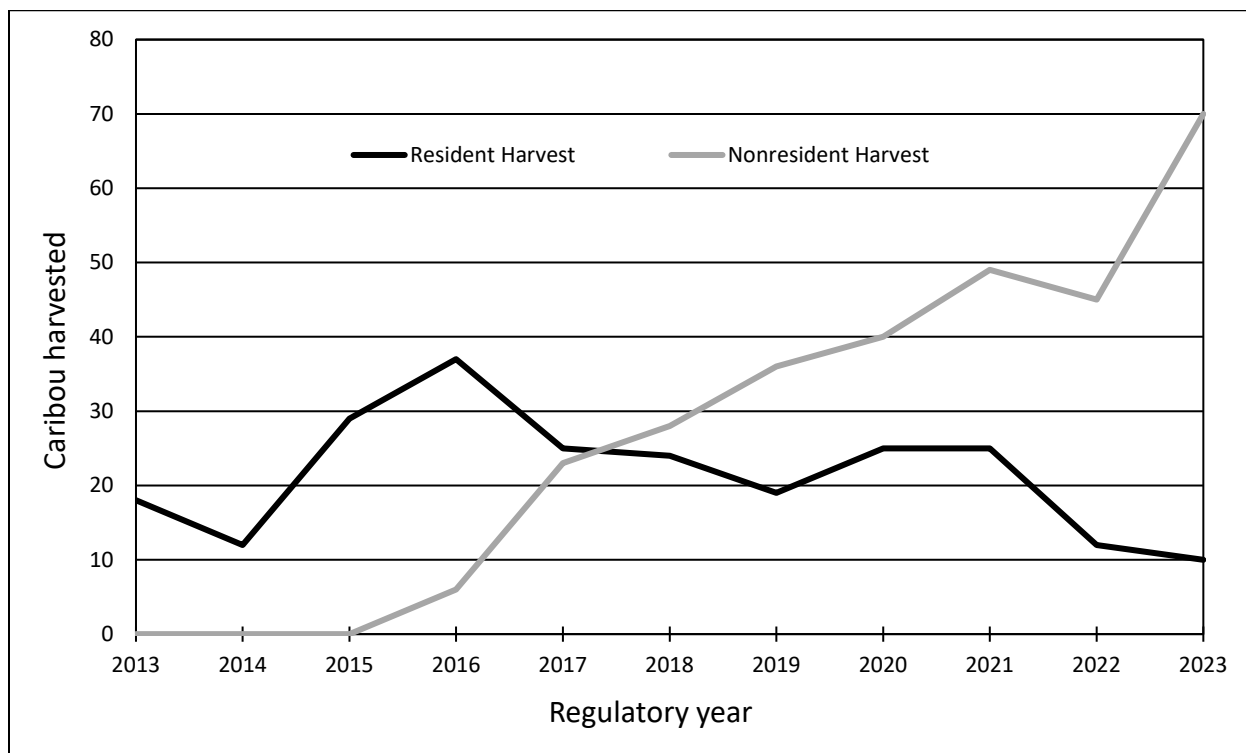


Figure 5-3. Number of reported caribou harvested by residents and nonresidents from the Southern Alaska Peninsula caribou herd, regulatory years 2013–2023.

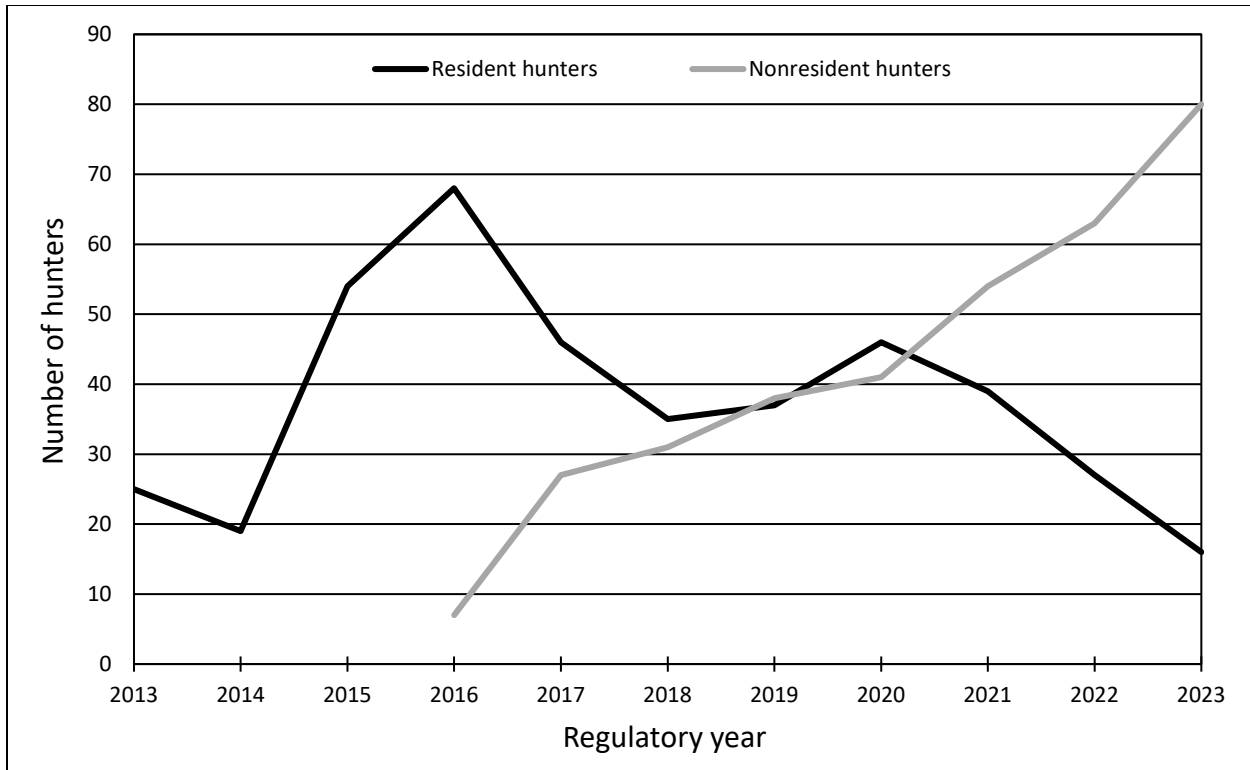


Figure 5-4. Number of resident and nonresident caribou hunters in Unit 9D, regulatory years 2013–2023.

Regulations have allowed nonresidents to harvest 2 bulls per regulatory year since 2018. Since then, 10 out of 307 nonresident hunters have harvested 2 bulls in the same year. During 2016–2023, 93% of nonresident caribou hunters used some type of commercial service to access Unit 9D. A limited number of transporters and guides is the limiting factor for nonresident hunters in Unit 9D.

DEPARTMENT COMMENTS: The department is **OPPOSED** to reducing opportunity by reducing the bag limit for caribou in the Southern Alaska Peninsula herd in Unit 9D for nonresidents from 2 bulls to 1 bull. The department is **NEUTRAL** on the allocation aspects of this proposal. The number of nonresidents harvesting more than 1 bull is negligible and the SAP can sustain additional harvest as resident hunters and harvest decreases. Additional caribou harvest is encouraged on the SAP to prevent habitat degradation. The Southern Alaska Peninsula caribou herd (SAP) is currently near the upper end of its population objective and more harvest is needed to keep it from overpopulating, causing habitat degradation, and an abundance decline as it has in the past. While the number of nonresidents who harvest more than 1 bull is negligible, any harvest potentially helps keep the herd within objectives and from growing too large.

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

PROPOSAL 6 – 5 AAC 85.025(a)(4). Hunting seasons and bag limits for caribou. Shortens nonresident hunting season for caribou in Unit 9D.

PROPOSED BY: Dave Leonard

WHAT WOULD THE PROPOSAL DO? The proposal shortens the nonresident general season for caribou in Unit 9D by 31 days from August 1–September 30 to September 1–September 30.

WHAT ARE THE CURRENT REGULATIONS?

Resident	Nonresident
Open Season	Open Season
(Subsistence and	
General hunts)	

(4)

Unit 9(D)

If the harvestable portion
is 99 caribou or less:

RESIDENT HUNTERS:

1 caribou by Tier II
subsistence hunting
permit only;

Aug. 1 - Sept. 30
(Subsistence hunt only)
Nov. 15 - Mar. 31
(Subsistence hunt only)

NONRESIDENT HUNTERS:

No open season.

If the harvestable portion
is greater than 99,
but less than 151 caribou:

RESIDENT HUNTERS:

1 caribou by registration
permit only

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

No open season.

If the harvestable portion
is greater than 150, but
less than 251 caribou:

RESIDENT HUNTERS:

2 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 250,
but less than 451 caribou:

RESIDENT HUNTERS:
3 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls

Aug. 1 - Sept. 30

If the harvestable por-
tion is greater than 450,
but less than 551 caribou:

RESIDENT HUNTERS:
4 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 550

RESIDENT HUNTERS:
5 caribou

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls

Aug. 1 - Sept. 30

The harvestable portion of the herd is greater than 250 but less than 451; the resident bag limit is 3 caribou and the nonresident bag limit is 2 bulls.

There is a positive customary and traditional use finding in Unit 9D and Unit 10, the South Alaska Peninsula Herd) with an Amount Reasonably Necessary for Subsistence (ANS) of 100-150 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were to be adopted there would be a decrease in hunting opportunity for nonresidents and as a result, a decrease in harvest.

BACKGROUND: The SAP herd in Unit 9D (Figure 6-1) has fluctuated in population levels from 500 to more than 10,000 caribou over the last 4 decades (Figure 6-2).

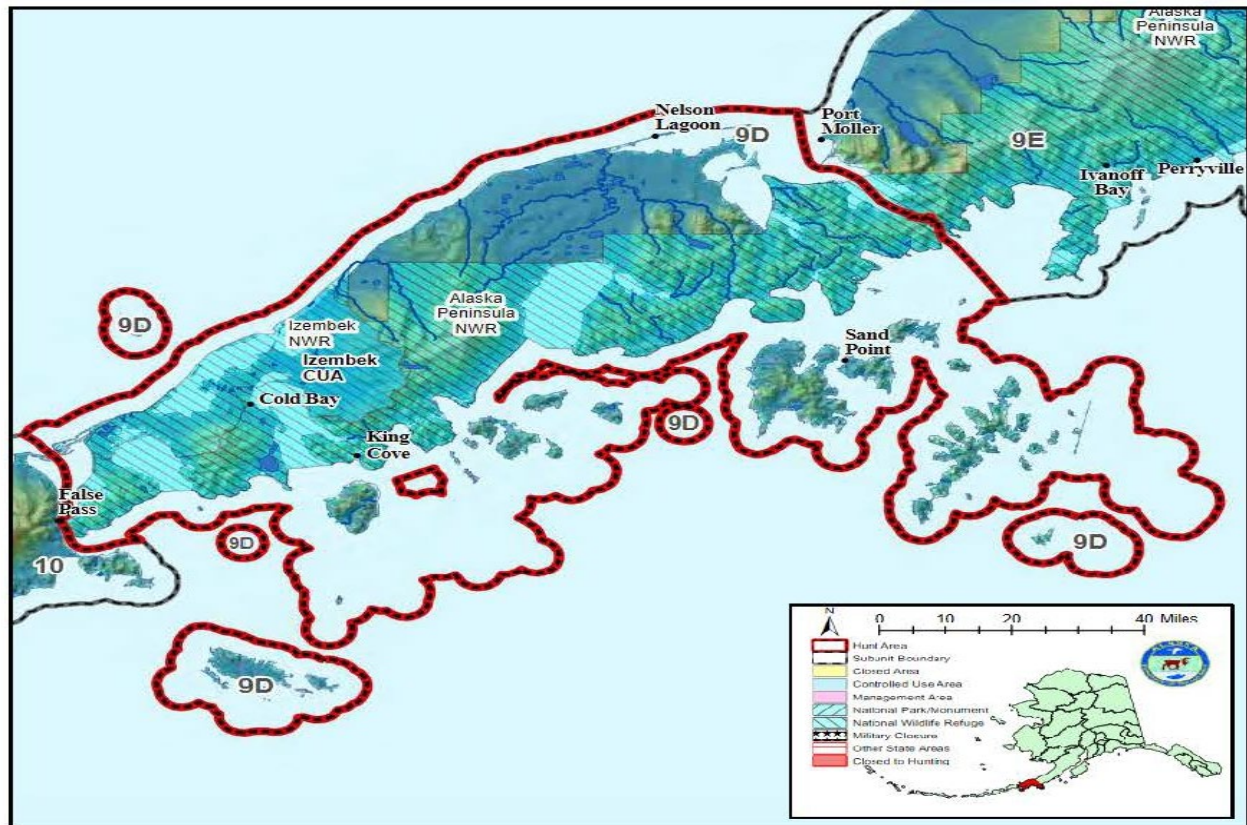


Figure 6-1. Southern Alaska Peninsula caribou herd range within Unit 9D.

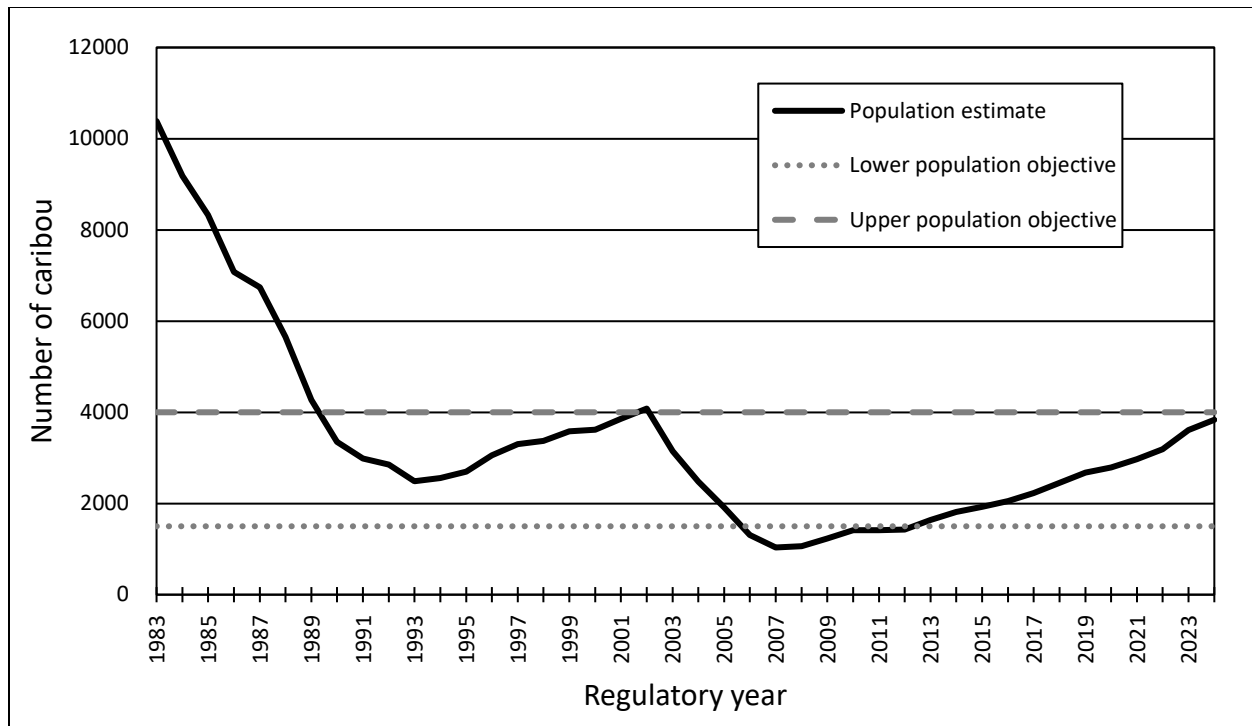


Figure 6-2. Population estimates for the Southern Alaska Peninsula caribou herd, regulatory years 1983–2024.

The current population objective is 1,500–4,000 caribou with a harvest objective of 150–200 caribou. The current population estimate is 4,000 after a minimum count was conducted in July 2024. Poor nutrition, predation by wolves and brown bears, and human-induced harvest are thought to be the main causes of the decline in the 1980s and early 1990s. By 2002, the herd increased to 4,100 caribou but declined rapidly to approximately 700 caribou in 2007; in response, state and federal hunts were closed again. Predator control of wolves was instated in 2008–2010 when it was determined that predation was the main cause of calf mortality. Department removal of wolves on the calving grounds increased calf survival from less than 1% in 2007 to 64% in 2008. After wolf control, population size, calf-to-cow ratio, and bull-to-cow ratios increased rapidly, and a Tier II and federal hunt were reinstated in 2013. With an increasing herd population, the board liberalized hunting for residents, eliminating the Tier II and changing the bag limit from 1 bull to 1 caribou in 2016. The board also created a nonresident hunt with a bag limit of 1 bull. Since 2016, resident season dates have been August 1–September 30 and November 15–March 31; nonresident season dates have been August 1–September 30.

Current population estimates and composition survey data indicate a harvest of more than 300 caribou per year is needed to maintain the 4,000 caribou objective. Additional caribou harvest above 300 is required to reduce the population so that it is within the population objective. Reported caribou harvest has increased from 18 caribou in 2013 to 80 bulls harvested in 2023 by primarily nonresident hunters (Figure 6-3). However, harvest objectives are not being met. Cow

harvest is negligible and has averaged 2 cows per regulatory year with zero cows harvested some years. Most caribou harvest by nonresidents occurs in September (Figure 6-4).

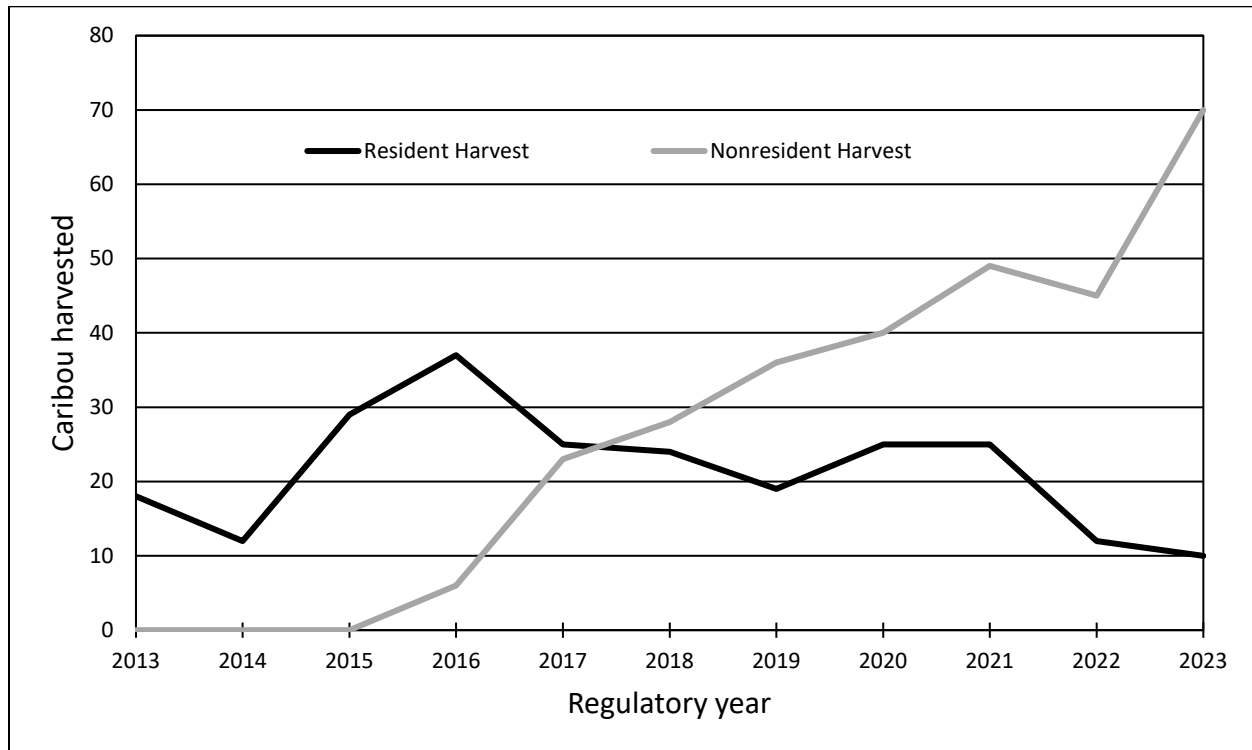


Figure 6-3. Number of reported caribou harvested by residents and nonresidents from the Southern Alaska Peninsula caribou herd, regulatory years 2013–2023.

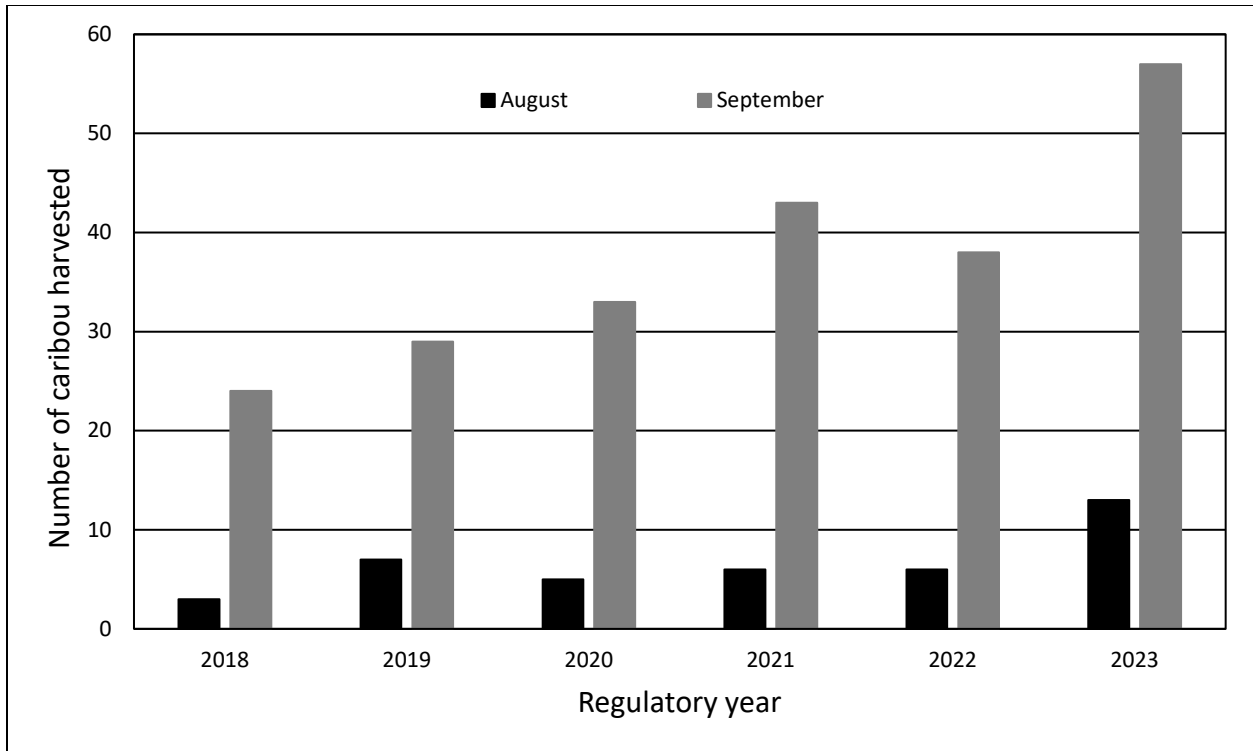


Figure 6-4. Number of caribou harvested by nonresident hunters in Unit 9D during August and September, regulatory years 2018–2023.

DEPARTMENT COMMENTS: The department is **OPPOSED** to reducing opportunity by shortening the nonresident season dates for caribou in the Southern Alaska Peninsula herd in Unit 9D. The department is **NEUTRAL** on the allocative aspects of this proposal. Most nonresidents utilize guides who are capable of transporting meat out of the field in a timely manner and the SAP can sustain additional harvest as resident hunters and harvest continues to decrease. Additional caribou harvest is encouraged on the SAP to prevent habitat degradation. The Southern Alaska Peninsula caribou herd (SAP) is currently near the upper end of its population objective and the additional harvest is needed to keep it from overpopulating, causing habitat degradation, and experiencing an abundance decline as it has in the past. While the majority of caribou are harvested in September, any additional harvest in August is desirable.

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

PROPOSAL 7 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal lengthens the season dates for caribou in Unit 9D for residents and nonresidents by 21 days from August 1–September 30 to August 1–October 21.

WHAT ARE THE CURRENT REGULATIONS?

Resident	Nonresident
Open Season (Subsistence and General hunts)	Open Season

(4)

Unit 9(D)

If the harvestable portion
is 99 caribou or less:

RESIDENT HUNTERS:

1 caribou by Tier II
subsistence hunting
permit only;

Aug. 1 - Sept. 30
(Subsistence hunt only)
Nov. 15 - Mar. 31
(Subsistence hunt only)

NONRESIDENT HUNTERS:

No open season.

If the harvestable portion
is greater than 99,
but less than 151 caribou:

RESIDENT HUNTERS:

1 caribou by registration
permit only

Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

No open season.

If the harvestable portion
is greater than 150, but
less than 251 caribou:

RESIDENT HUNTERS:

2 caribou

Aug. 1 - Sept. 30

Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 250,
but less than 451 caribou:

RESIDENT HUNTERS:

3 caribou

Aug. 1 - Sept. 30

Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 450,
but less than 551 caribou:

RESIDENT HUNTERS:

4 caribou

Aug. 1 - Sept. 30

Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

If the harvestable portion
is greater than 550

RESIDENT HUNTERS:

5 caribou

Aug. 1 - Sept. 30

Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:

2 bulls

Aug. 1 - Sept. 30

The harvestable portion of the herd is greater than 250 but less than 451; the resident bag limit is 3 caribou and the nonresident bag limit is 2 bulls.

There is a positive customary and traditional use finding in Unit 9D and Unit 10, the South Alaska Peninsula Herd) with an Amount Reasonably Necessary for Subsistence (ANS) of 100-150 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were to be adopted there would be increased hunting opportunity for residents and nonresidents which could result in additional harvest. The Southern Alaska Peninsula caribou herd (SAP) is currently near the upper end of its population objective and more harvest is needed to keep it from overpopulating, causing habitat degradation, and experiencing an abundance decline as it has in the past. Resident hunter participation and harvest have been decreasing since 2016 and lengthening the caribou season to coincide with the brown bear hunt is expected to increase bull caribou harvest by nonresident brown bear hunters.

BACKGROUND: The Southern Alaska Peninsula caribou herd (SAP) in Unit 9D (Figure 7-1) has fluctuated in population levels from 500 to more than 10,000 caribou over the last four decades (Figure 7-2). The current population objective is 1,500–4,000 caribou with a harvest objective of 150–200 caribou. The current population estimate is 4,000 after a minimum count was conducted July 2024. Poor nutrition, predation by wolves and brown bears, and human-induced harvest are thought to be the main causes of the decline in the 1980s and early 1990s. By 2002, the herd increased to 4,100 caribou but declined rapidly to approximately 700 caribou in 2007; in response, state and federal hunts were closed again. Predator control of wolves was conducted in 2008–2010 when it was determined that predation was the main cause of calf mortality. Department removal of wolves on the calving grounds increased calf survival from less than 1% in 2007 to 64% in 2008. After wolf control, population size, calf-to-cow ratio, and bull-to-cow ratios increased rapidly, and a Tier II and federal hunt were reinstated in 2013. With an increasing herd population, the board liberalized hunting for residents, eliminating the Tier II and changing the bag limit from 1 bull to 1 caribou in 2016. The board also created a nonresident hunt with a bag limit of 1 bull. Since 2016, resident season dates have been August 1–September 30 and November 15–March 31; nonresident season dates have been August 1–September 30.

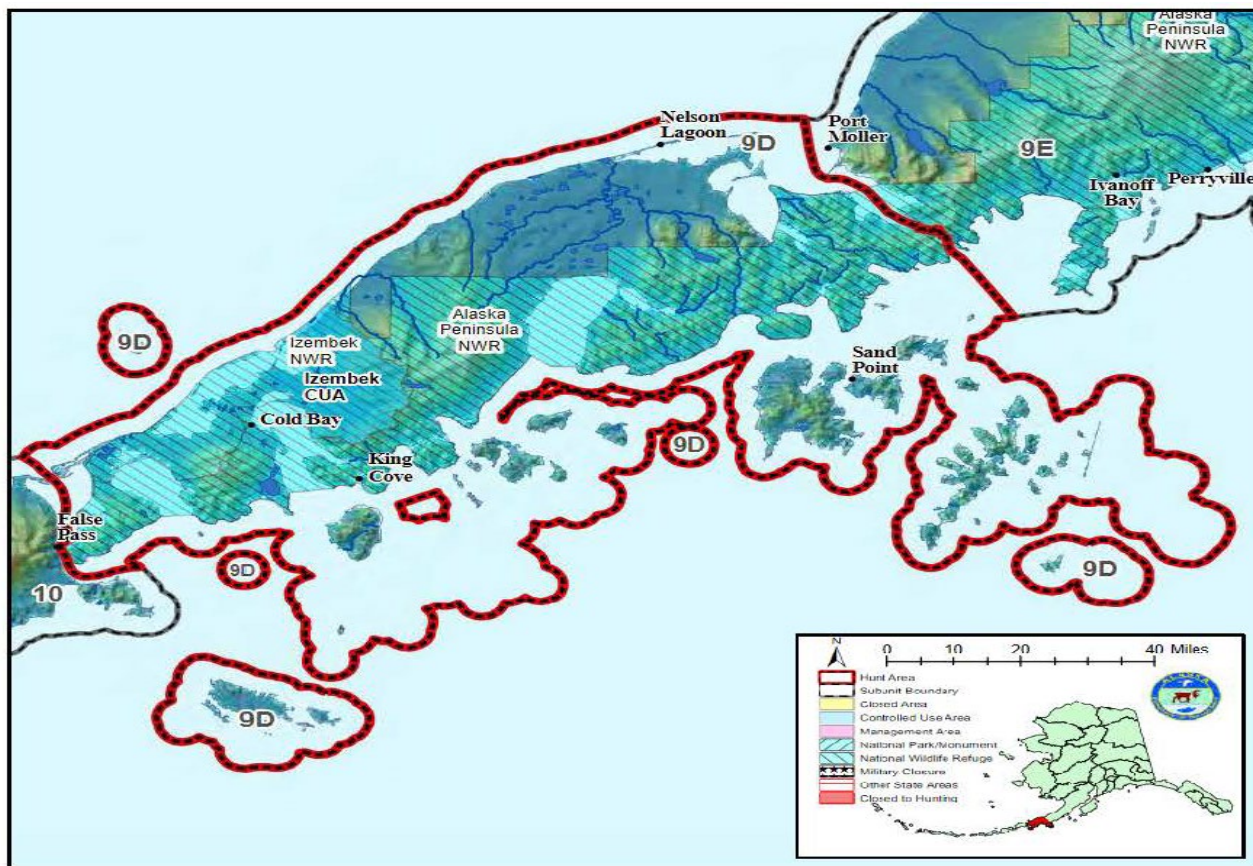


Figure 7-1. Southern Alaska Peninsula caribou herd range within Unit 9D.

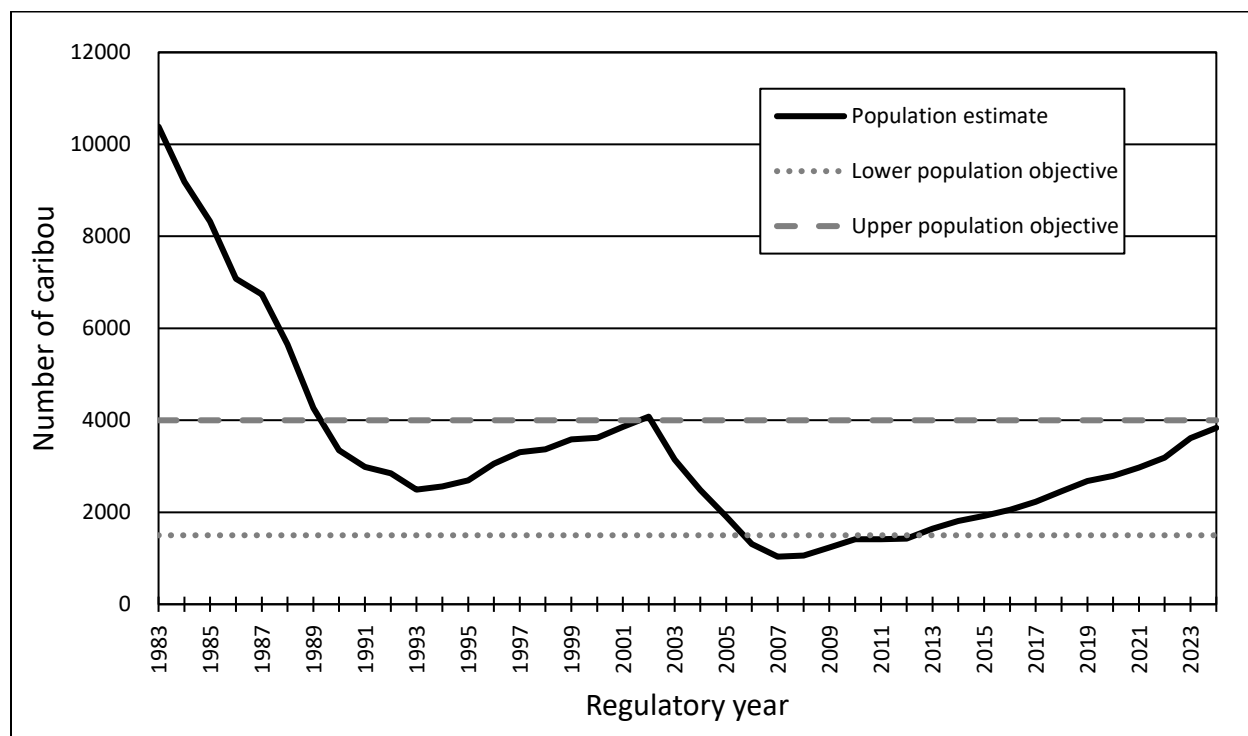


Figure 7-2. Population estimates for the Southern Alaska Peninsula caribou herd, 1983–2024.

Current population estimates and composition survey data indicate a harvest of more than 300 caribou per year is needed to maintain the herd within the 4,000 caribou objective. Additional caribou harvest above 300 is required to reduce the population so that it is within the population objective. Reported caribou harvest has increased from 18 caribou in 2013 to 80 bulls harvested in 2023 by primarily nonresident hunters (Figure 7-3). However, harvest objectives are not being met. Most recent composition data was 51.5 for a calf:cow ratio and 35 for a bull:cow ratio. Approximately 150 people have hunted brown bears in Unit 9D during the previous 2 open fall hunts. It is not expected that every brown bear hunter will harvest a caribou, but the additional opportunity is desired and the SAP could sustain the potential increase in harvest.

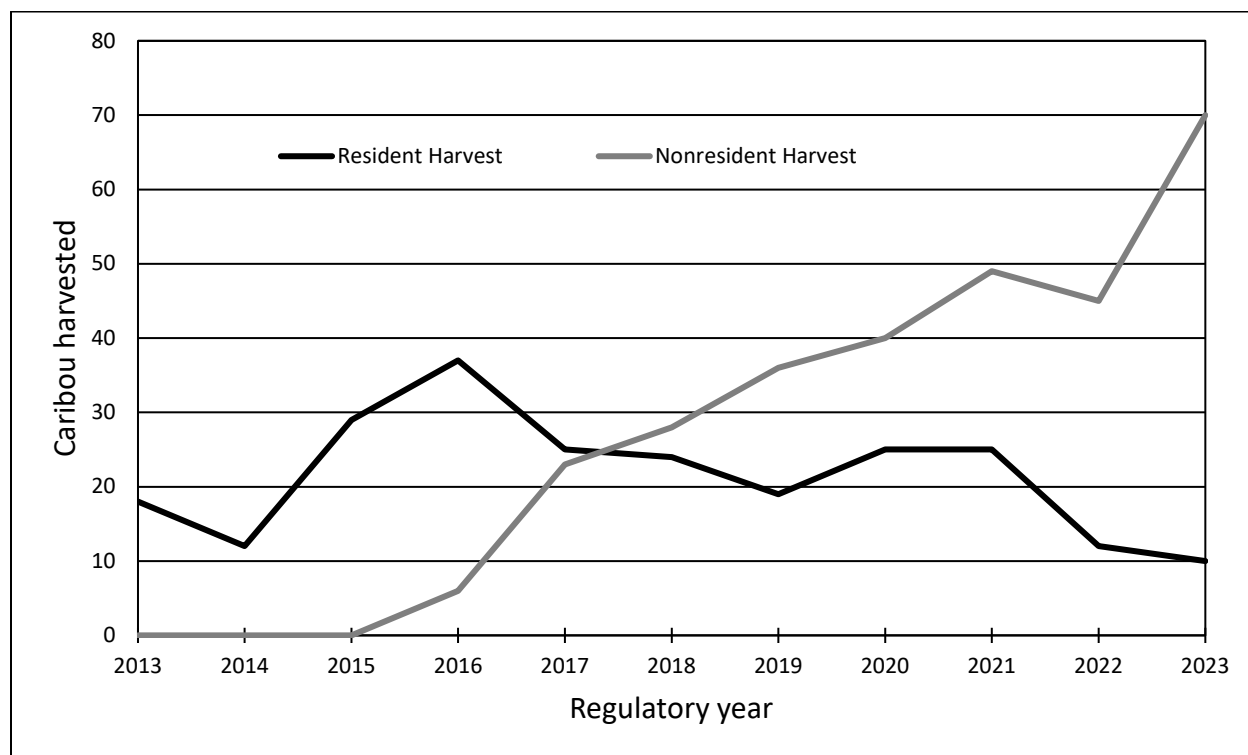


Figure 7-3. Number of reported caribou harvested by residents and nonresidents from the Southern Alaska Peninsula caribou herd, regulatory years 2013–2023.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** lengthening the season. The majority of harvest is by guided nonresidents. This proposal provides additional harvest opportunity for both residents and nonresidents, however, the department does not think harvest will be substantially affected in years when there is no brown bear season. The SAP caribou herd is at the upper end of the population objective and can sustain additional harvest to prevent the herd from exceeding population objectives

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

PROPOSAL 8 – 5 AAC 92.990(a)(21). Definitions. Add reindeer under definition of “deleterious exotic wildlife”; or **92.029(2)(C). Permit for possessing live game.** Create a hunting season for free-ranging reindeer under 5 AAC 85.025 on Umnak Island, in Unit 10.

PROPOSED BY: Chaluka Corporation

WHAT WOULD THE PROPOSAL DO? This proposal asks to clarify if this population of reindeer are feral and create appropriate regulations to hunt reindeer on Umnak Island by adding feral reindeer to the list of “deleterious exotic wildlife” or establish a hunt for feral reindeer by designating them as game on Umnak Island in Unit 10. The board has the authority to set seasons and bag limits for deleterious exotic wildlife, and currently the season and bag limit for all deleterious exotic wildlife is no closed season and no bag limit. The proponent would like to see no closed season with no bag limit for these animals.

WHAT ARE THE CURRENT REGULATIONS? There is no regulation defining reindeer as deleterious exotic wildlife and there is no current state hunting season for free-ranging reindeer as game on Umnak Island in Unit 10. Regulations governing possession of reindeer and reindeer hunting are addressed below. A season for feral reindeer on Kodiak has been in place since 1962. There is no open caribou season on Umnak Island.

92.029 permit for possessing live game (except feral reindeer) Rangifer tarandus

(d) Under this section, and in accordance with the definition of "game" in AS 16.05.940 (which includes feral domestic animals), a

(1) game animal defined as deleterious exotic wildlife or nonindigenous gallinaceous bird is feral if the animal is not under direct control of an owner, including being confined in a cage or other physical structure, or being restrained on a leash; the commissioner may capture, destroy, or dispose of any feral deleterious exotic wildlife or feral nonindigenous gallinaceous bird in an appropriate manner;

(2) musk oxen, bison, or reindeer that is lawfully owned, or an elk held under a valid game mammal farming license, that is not confined or is not under positive control is feral unless the animal is a free-ranging animal under a state or federal grazing lease; however,

(A) a person who can demonstrate ownership of the animal may pursue and capture the animal within 48 hours after the animal escapes from confinement, without needing to obtain a permit from the department;

(B) a person who can demonstrate ownership of the animal may pursue and capture the animal more than 48 hours after the animal escapes from confinement only if the person obtains a permit from the department;

(C) any free-ranging musk oxen, bison, reindeer, or elk for which ownership cannot be demonstrated is presumed to be game;

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,

...

(21) "deleterious exotic wildlife" includes

- (A) English sparrow;
- (B) raccoon;
- (C) starling;
- (D) unconfined or unrestrained
 - (i) Belgian hare;
 - (ii) Muridae rodent;
 - (iii) rockdove;
- (E) feral
 - (i) ferret;
 - (ii) swine;
- (F) Eurasian collared dove;

....

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A clear, legal pathway would be established to harvest feral reindeer through hunting on Umnak Island in Unit 10. The opportunity would benefit locals, resident, and nonresidents through guiding, hunting, and other economic opportunities. The number of reindeer would likely be reduced depending on participation but it is unclear how much of a positive effect on habitat this would have, or the length of time needed to see improvement.

BACKGROUND: Umnak Island is part of the Fox Islands located in the Unit 10 portion of the Aleutian Islands approximately 850 miles from Anchorage. The 1,571 mi² island is the third largest Aleutian Island and is owned by eight landowners including the state, the federal government (Alaska Maritime National Wildlife Refuge), Chaluka Corporation (Nikolski), TDX Corporation (St. Paul), and St. George Tanaq Corporation (St. George). All island inhabitants (<50) reside in the only remaining community of Nikolski.

Reindeer were introduced to Umnak Island in 1923 as a source of food and economic benefit. Without fencing they are believed to roam freely and number around 5,000 according to a 2022 survey conducted by Alaska Pribilof Islands Community Development Association (APICDA) (Figure 8-1).

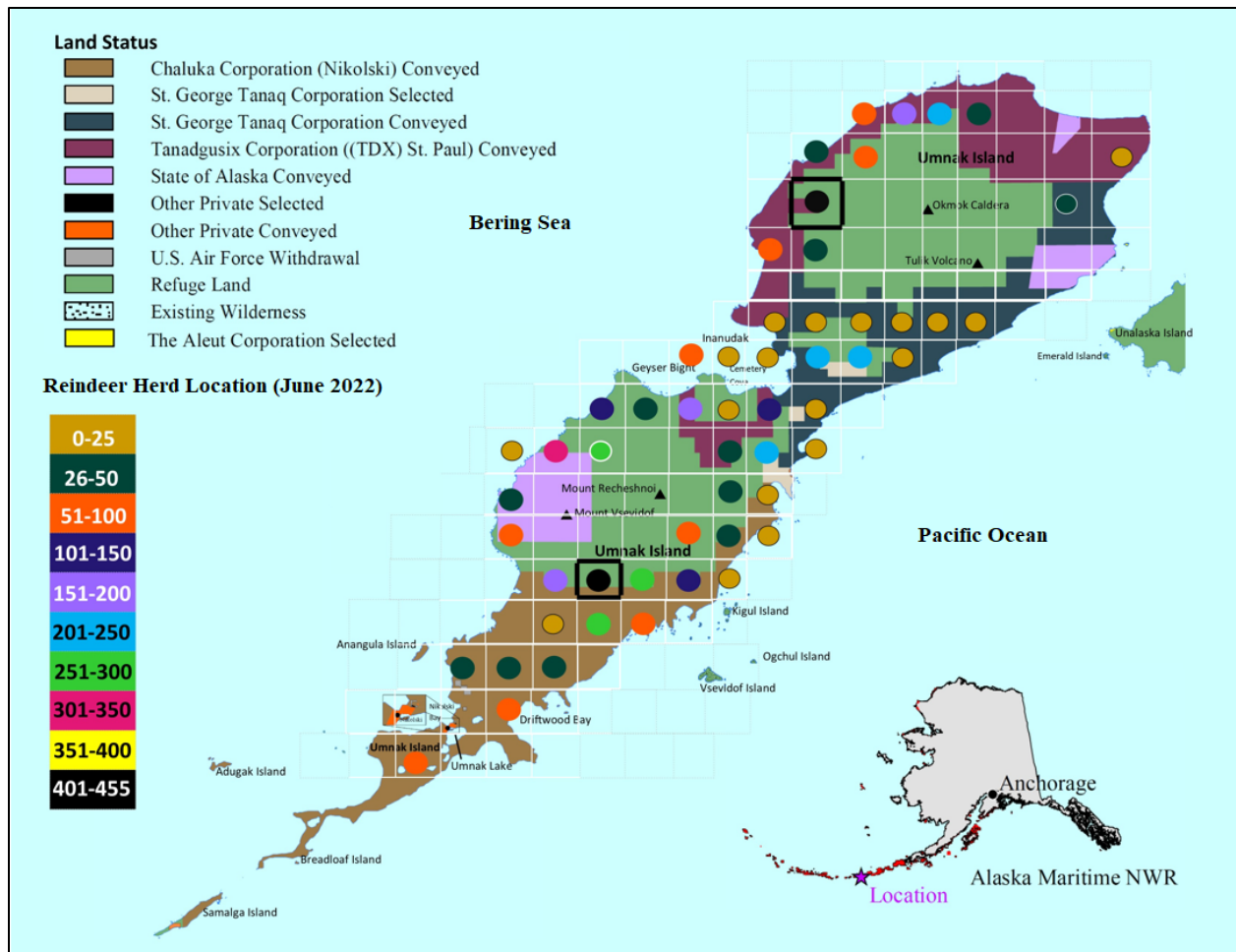


Figure 8-1. Caribou locations during 2022 survey of Umnak Island (map courtesy of APICDA).

According to the proponent sometime after ANCSA passed in 1971:

Two Alaska Native corporations [TDX and Tanaq]...acquired ownership of reindeer on the island. However, the herd has since spread throughout the Island and established itself elsewhere, including heavy concentrations of animals on land more than 25 miles away which is owned by the Chaluka Corporation (village corporation with land holding near Nikolski). Local residents, a key landowner (Chaluka Corporation) and tribal leadership have advised that there have been no efforts to manage the herd for at least 25 years. The herd is now considered a nuisance and a habitat/conservation risk by local residents given its size and the risk of overgrazing.

At least one guide/outfitter has been offering reindeer hunts for at least 6 years on Umnak (through 2022) with a price tag of over \$15,000 but it is unclear if animals taken were on private, state, or federal land.

On Kodiak Island, the state opened a hunt for feral reindeer in 1962, with no closed season no bag limit. To control the herd's trajectory the BOG authorized same-day-airborne (SDA) hunting in 2002, however in 2009, the board reclassified them as caribou and prohibited SDA. In 2023, the board changed the hunt from a harvest ticket hunt to a registration permit and modified the bag limit and season dates. No such regulations exist for Umnak Island.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to clarify or establish hunting opportunity for reindeer on Umnak Island. The department recommends classifying reindeer as feral and including them in the definition of deleterious exotic wildlife. Whereby there would be no closed season or bag limit. This is a graduated response to this request and potentially others involving reindeer that are no longer actively herded. As with reindeer on Kodiak, it may be appropriate to reclass the animals to caribou if hunting interest increases or the department is asked to take an active role in managing the herd.

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

PROPOSAL 9 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears. Modify the spring and fall brown bear hunting seasons in Unit 9.

PROPOSED BY: Anthony Marchini

WHAT WOULD THE PROPOSAL DO? This proposal would reinstate the previous 21-day season brown bear season dates for Units 9B, D, & E to October 1–October 21 and May 10–May 31 for residents and nonresidents, maintaining the same biennial season structure. This would lengthen the season in Units 9D and 9E, and reduce it in 9B.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368, RB369, and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring. These regulations have been in place since 1976.

Units 9A and 9C: residents and nonresidents October 1–October 21; May 10–May 31

Unit 9B: residents and nonresidents September 20–October 21; May 10–May 31

Units 9D and 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and the border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9, open year-round with a bag limit of 1 bear per regulatory year.

There is a positive for customary and traditional use (C&T) finding of brown bear in Unit 9B and 9E with an amount necessary for subsistence of 10–20 bears and 10–15 bears, respectively. There is a negative C&T finding for brown bear in units 9A, 9C, and 9D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunting opportunity and potentially an increase in bear harvest in Units 9D and 9E with a decrease in hunting opportunity in Unit 9B. Units 9A and 9C would remain the same. Unit 9 brown bear season lengths are complicated and this proposal does not address regulatory complexity. There are currently no conservation concerns with the brown bear population in Unit 9 and no expected user group conflicts if the season dates change to the proposed dates. Lengthening the seasons to what they had been previously addresses concerns of hunter crowding.

BACKGROUND: Historically, season dates for all brown bear hunts in Unit 9 were October 1–October 21 (except Unit 9B was September 20–October 21) and May 10–May 25. The October (fall) season was open in odd years while the May season (spring) was open in even years. Spring season dates were lengthened beginning regulatory year 2013 to May 10–May 31. Concerns about significant increases in the percentages of males over 8-years old and adult females in the harvest caused a shortening of season dates for Units 9C, 9D, and 9E to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Season dates were again adjusted for 2023: the fall and spring seasons for Unit 9C were lengthened to October 1–October 21 and May 10–May 31 and the spring season for residents was lengthened in Units 9D and 9E to May 10–May 31.

Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Total harvest reached a peak during the 1999 and 2001 hunting seasons (Figure 9–1). The spike during the 2020–2021 hunting season is due to having three hunting seasons in a row to make up for the closure and travel restrictions that were in place during the 2019 spring season due to COVID. When the 1998–2021 season harvests are averaged together, average harvest is 449 per biennial season, which is similar to the previous 2 biennial seasons.

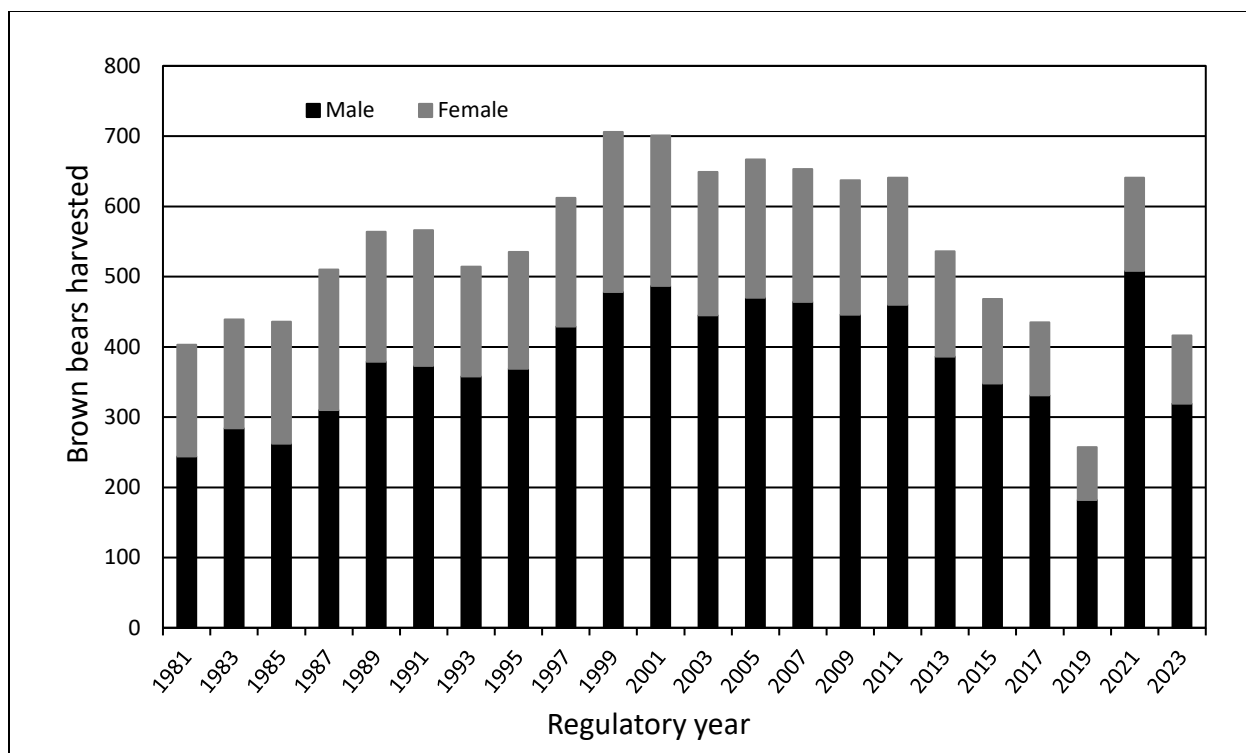


Figure 9–1. Total brown bears harvested in Unit 9, regulatory years 1981 through 2023.

The harvest chronology in Unit 9B shows 72% of brown bears harvested in the fall are harvested early in the regulatory season in September. Unit 9C did not see any significant decline or increase in harvest as a result of the changes in seasons. Units 9D and 9E also did not see any decline in harvest aside from the overall gradual decline seen throughout the whole unit. Units 9D and 9E saw an increase in harvest during the second week timeframe of the fall hunt when the season dates were shortened (Figure 9–2). Unit 9D averaged 102 bears harvested per biennial season for regulatory years 2016–2021 and Unit 9E averaged 206 brown bears harvested during the same timeframe. The harvests in both units were down slightly for the 2023 hunting season, continuing the overall gradual decline. Success rates for Unit 9 for regulatory years 2011–2023 has not shown any major declines and has been stable around 56–62% for the past decade.

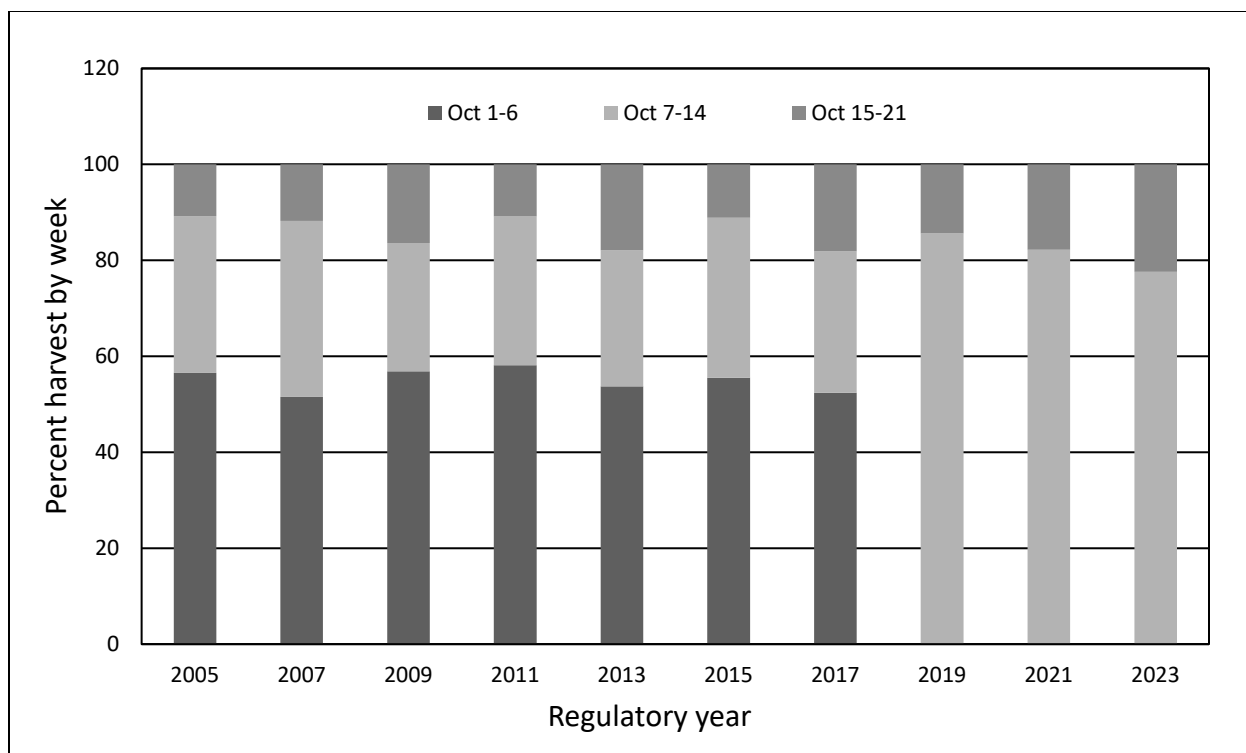


Figure 9-2. Harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when fall season was shortened starting in 2019, regulatory years 2005 through 2023.

Due to the difficulty of obtaining population and density estimates for brown bears, biological data is obtained from harvested animals, such as sex, skull size, and age. Average skull size has trended upward for harvested males and females (Figure 9-3), indicating adequate resources for growth. Average age has also increased for harvested male and female brown bears in Unit 9 (Figure 9-4). Age data is not available for regulatory year 2023 yet. Harvested males have increased in age from an average of 6.6 years old during the 1980s, 7.6 during the 1990s and 2000s, and 9.6 during the 2010s. The spike in average age during the mid-2010s is thought to be due to a loss of the younger cohort of brown bears from natural stochastic events, particularly an extended winter during 2012 and 2013. A decrease in percentage of adult males and females in the harvest may indicate a younger cohort being recruited back into the population (Figure 9-5).

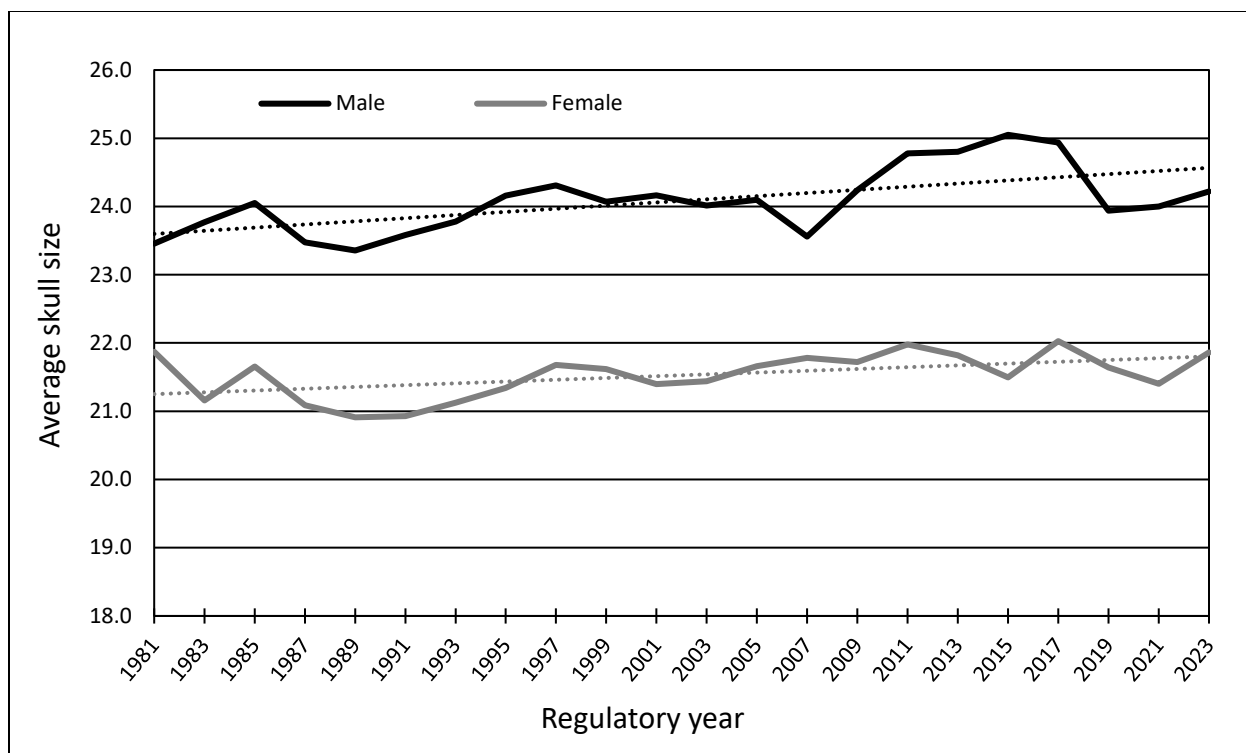


Figure 9-3. Average skull size of harvested male and female brown bears in Unit 9, regulatory years 1981 through 2023.

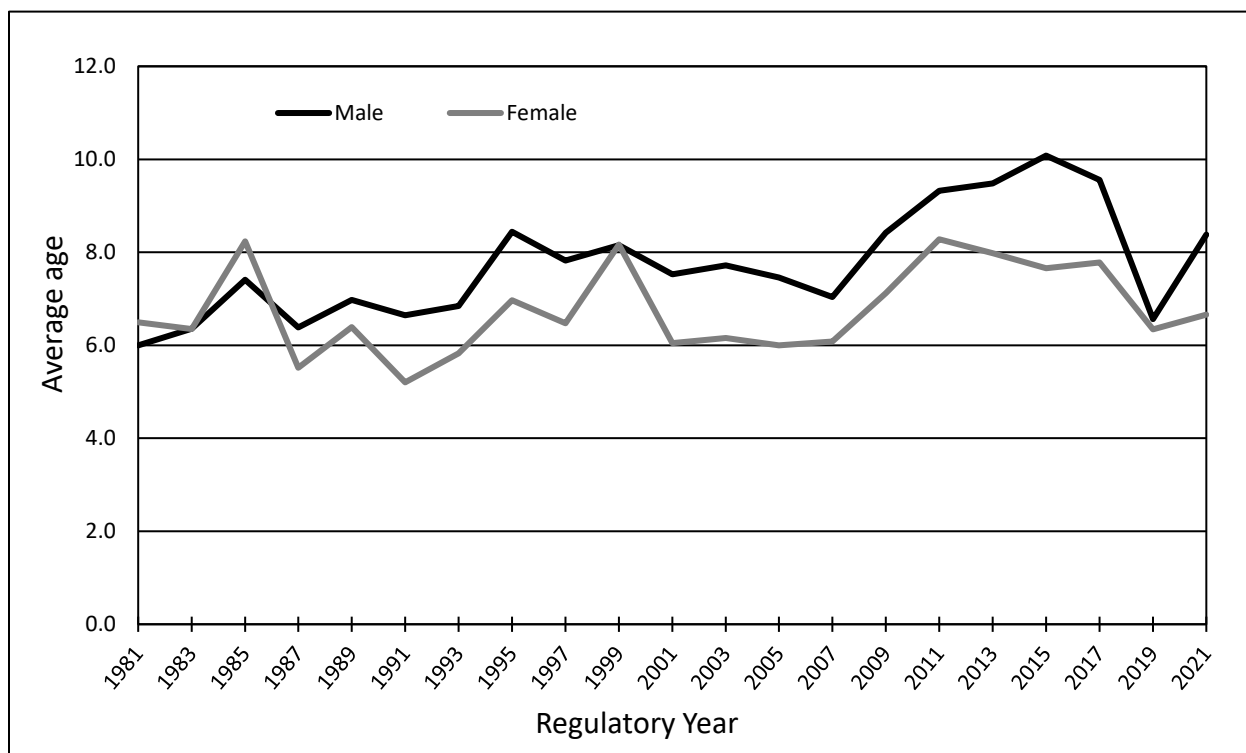


Figure 9-4. Average age of harvested male and female brown bears in Unit 9, regulatory years 1981 through 2023.

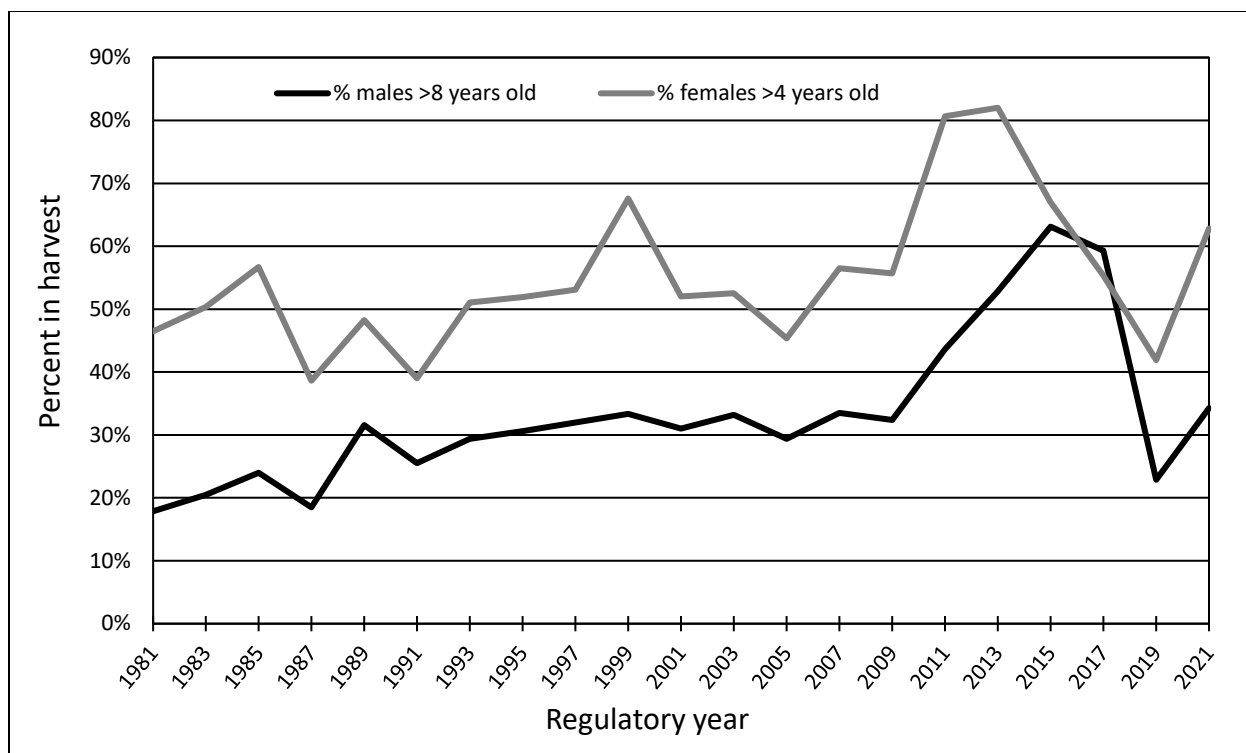


Figure 9-5. Percent harvested male brown bears greater than 8 years old and percent harvested female brown bears greater than 4 years old in Unit 9, regulatory years 1981 through 2021.

Management objectives for Unit 9 include sustaining a harvest composed of 60% males and 50 males 8-years-old or older harvested during the combined fall and spring seasons. These objectives have been regularly met or exceeded since 1983 with male harvest ranging from 60–79% and harvested males 8-years-old or older ranging from 57 initially to a high of 207 in 2015 with most years being in the mid-100s.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to make season dates for Units 9A, 9C, 9D, and 9E be October 1–October 21 and May 10–May 31 and with a modification for Unit 9B. The suggested modification of Unit 9B would be to keep the current season dates of September 20–October 21 and May 10–May 31 in order to continue providing current levels of subsistence opportunity. There are currently no conservation issues with brown bears in Unit 9. If the proposal were adopted as written, the board should determine if the regulations in Unit 9B would continue to provide reasonable opportunity for subsistence uses of brown bear. The existing regulations were intended to decrease harvest, however, there has been no decrease in harvest since they were implemented.

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

PROPOSAL 10 – 5 AAC 85.020, Seasons and bag limits for brown bears. Close nonresident brown bear hunting in Unit 9A.

PROPOSED BY: Wayne Hall

WHAT WOULD THE PROPOSAL DO? The proposal would close the nonresident brown bear hunt in Unit 9A.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9A can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*. Registration brown bear permits available for Unit 9A include RB368 for the fall hunt and RB370 for the spring hunt.

Regulations are 1 brown bear every 4 regulatory years, October 1–21 and May 10–31. Biennial seasons are open every other year during odd years in the fall and even years in the spring which have been in effect since 1976. Residents and nonresidents have the same seasons and bag limits for registration hunts RB368 and RB370. There is a negative customary and traditional use determination for brown bear in Unit 9A.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? By eliminating nonresident hunting opportunity in Unit 9A there would be an unnecessary loss of hunting opportunity. There are no conservation concerns for brown bear in Unit 9A. Bear viewing and bear hunting have coexisted in Unit 9 for decades. The majority of brown bear harvest comes from guided nonresident hunters, which is also seen in the rest of Unit 9.

BACKGROUND: Unit 9A has approximately 1,600 mi² of available brown bear habitat (with high elevation and large bodies of water subtracted) of which about 480 mi² is open to bear hunting (Table 10-1, Figure 10-1). The remaining 1,130 mi² of bear habitat is in Lake Clark National Park (LCNP) and McNeil River State Game Refuge and Sanctuary, both of which are closed to hunting and provide large areas of refugia. However, bears have large home ranges and move freely across administrative boundaries. Seasonal and daily movements are largely the result of available food resources.

Table 10-1. Unit 9A land and hunting closure status. Bear habitat is considered below 2,700 ft elevation with large water bodies removed.

Land area	mi ²	km ²
Unit 9A area	2,149	5,566
Lake Clark NP portion of Unit 9A	1,889	3,081
McNeil River SGS&R portion	426	1,104
All Unit 9A bear habitat area	1,609	4,168
Bear habitat closed to hunting		
Lake Clark NP	726	1,880
McNeil River SGS&R	404	1,046
Total area closed	1,130	2,926
Unit 9A bear habitat open to hunting	479	1,242

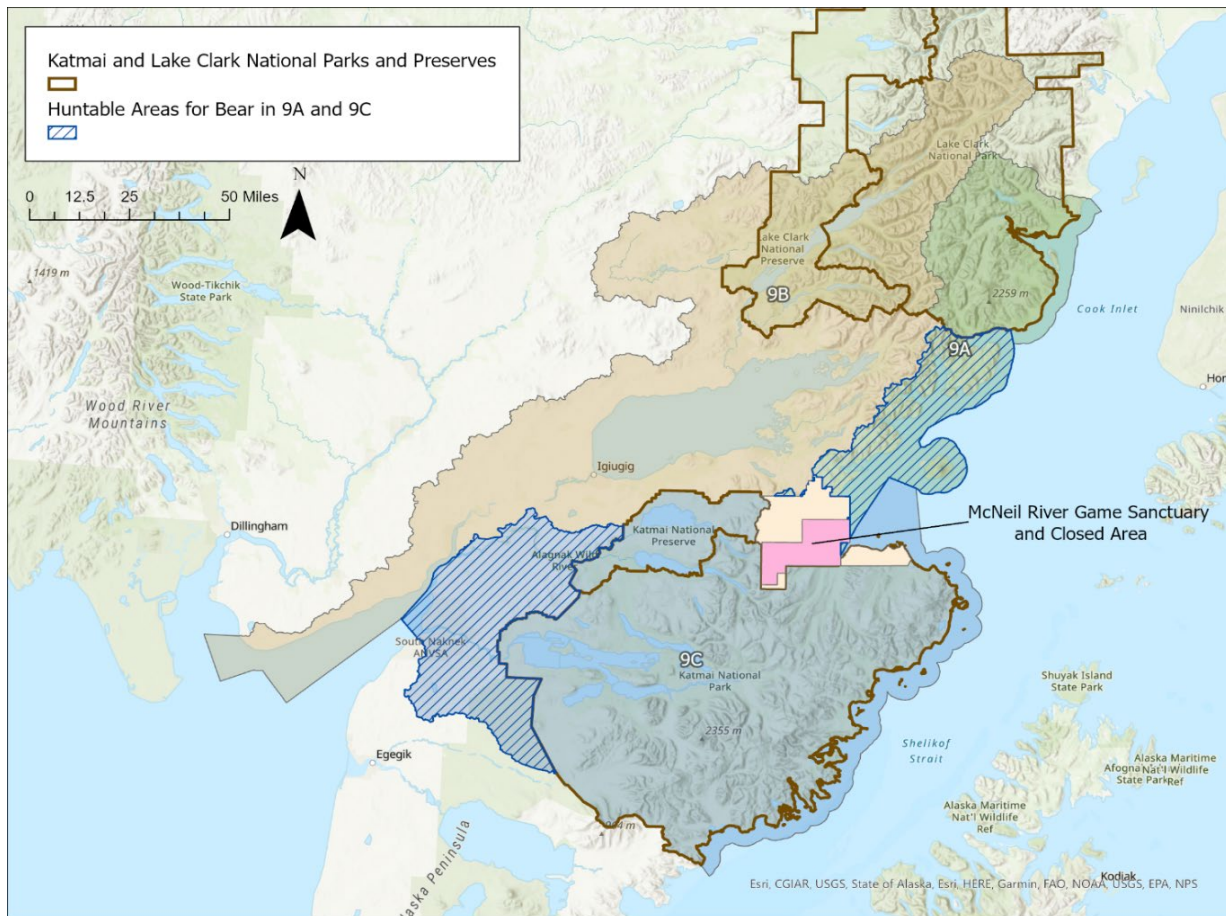


Figure 10-1. Unit 9A is composed primarily of Lake Clark NP to the north, a central area of state and private lands, and McNeil River State Game Refuge and Sanctuary to the southwest.

Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Average annual harvest in Unit 9A during 2013–2023 was 31.6 brown bears, driven mainly by a post-Covid spike and consecutive years with hunting seasons (Table 10-2). Based on the abundance estimate for Unit 9A by Lake Clark National Park biologists in 2003, 31.6 bears represent a harvest rate of approximately 3.8–5.6% for a population ranging from 569 to 837 bears. This is a sustainable harvest rate for coastal brown bears. Nonresident hunters harvest the majority of brown bears in Unit 9A (Table 10-2). Average ages of both male and female bears in the harvest have trended upwards since 2000 (Figure 10-2, data does not include regulatory years 2022–2023). Average skull sizes of both male and female bears are consistent through the time period (Figure 10-3).

Table 10-2. Unit 9A brown bear harvest and successful hunter participation by residency for biennial hunts RB368 and RB370, regulatory years 2013–2023. Total hunters include unsuccessful resident and nonresident hunters.

R/Y	Total Resident Hunters	Total Nonresident Hunters	Percent Successful Residents	Percent Successful Nonresidents	Percent Total Successful	Total Hunters
2013	19	61	3.8	53.8	57.5	80
2014	0	0	0	0	0	0
2015	17	53	11.4	57.1	68.6	70
2016	0	0	0	0	0	0
2017	29	82	6.3	50.5	56.8	111
2018	0	0	0	0	0	0
2019 ^a	33	24	26.3	33.3	59.6	57
2020 ^b	14	49	9.5	61.9	71.4	63
2021	22	89	8.1	49.5	57.7	111
2022	0	0	0	0	0	0
2023	14	65	3.8	62.0	65.8	79

^a Fall season only

^b Spring (2021) season only

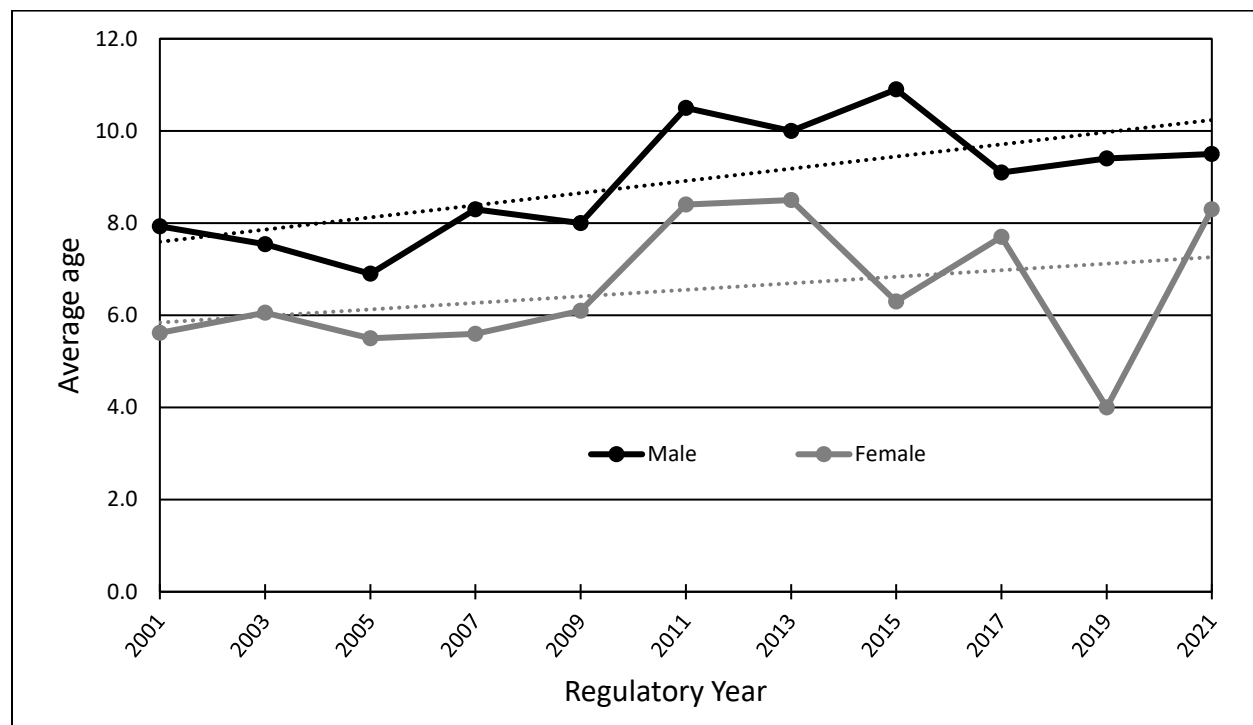


Figure 10-2. Average ages of male and female brown bears harvested in Unit 9A, regulatory years 2001–2021.

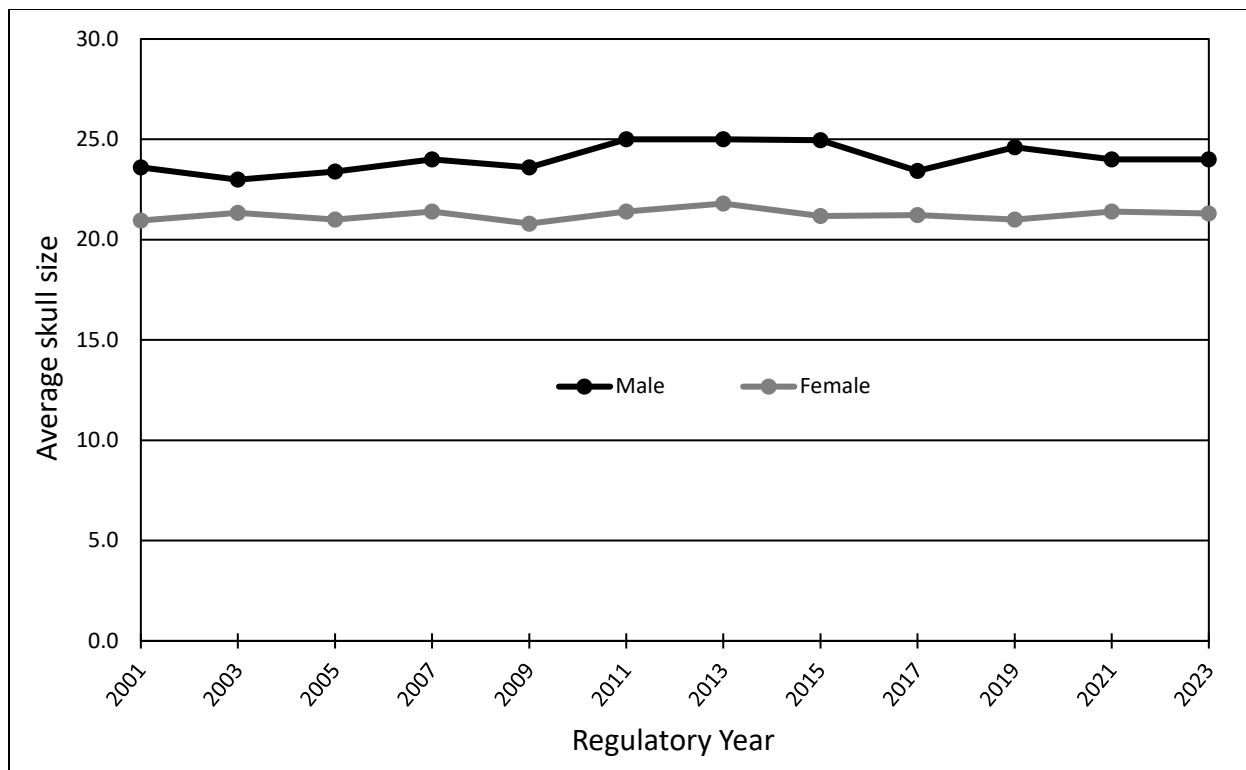


Figure 10-3. Average skull sizes of male and female brown bears harvested in Unit 9A, regulatory years 2001–2021.

Harvest has rarely exceeded an annual average harvest of 30 bears, but it did occur in 2019–2020 during the Covid-19 pandemic and right after. Regulatory year 2023 saw a decline to early 2010s lower harvest and hunter levels (Table 10-2). Increasing harvest and hunter participation can be managed through season restrictions and Emergency Orders rather than closure to all nonresident hunting, if deemed necessary.

DEPARTMENT COMMENTS: The department **OPPOSES** reducing hunting opportunity by closing nonresident bear hunting unnecessarily in Unit 9A. The department is **NEUTRAL** on the allocative aspects of this proposal. Average ages and skull sizes are not showing any declines which indicate there are older age classes of brown bear available for harvest. A decrease in average age and skull sizes would indicate a loss of the older age class of bears, which has not been seen. There are currently no conservation issues with brown bears in Unit 9A with the extensive refugia provided by Lake Clark National Park and McNeil River State Game Refuge and Sanctuary.

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

PROPOSAL 11 - 5 AAC 85.020, Seasons and bag limits for brown bears. Shorten the spring and fall brown bear hunting seasons in Unit 9C.

PROPOSED BY: Jennifer Culbertson

WHAT WOULD THE PROPOSAL DO? Shorten the brown bear season dates in Unit 9C by 12 days from October 1–October 21 and May 10–May 31 to October 7–October 21 and May 10–May 25 for both residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*. Registration permits available for Unit 9C include RB368 for the fall hunt in odd years, RB370 for the spring hunt in even years, and RB525 open to residents year-round for near villages.

Regulations are 1 brown bear every 4 regulatory years by registration permit, October 1–21 and May 10–31 for residents and nonresidents. Biennial seasons are open every other year during odd years in the fall and even years in the spring which have been in effect since 1976. Resident hunters can also hunt with an RB525 permit within 5 miles of each community (King Salmon, Naknek and South Naknek) in Unit 9C, open year-round with a bag limit of 1 bear per year. There is a negative customary and traditional use finding for brown bear in Unit 9C.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will decrease hunter opportunity and may alleviate the concern of hunters and viewers occupying the same locations during portions of the hunting, viewing and fishing season. For comparison, season dates were shortened for Units 9D and 9E in regulatory year 2019 in an attempt to decrease harvest. The shortened season dates for those units mimic what this proposal is intending. After shortening season dates in Units 9D and 9E, brown bear harvest became more concentrated during the first week of the fall season and there was no pattern seen for harvest during the spring season. Overall, there was no significant decrease in brown bear harvest, just a different distribution of when bears were harvested. It is anticipated that this unit would show the same trend with no overall decrease in brown bear harvest. There are currently no conservation concerns with brown bears in Unit 9C. Katmai National Park provides an extensive refugia from hunting pressure.

BACKGROUND: Unit 9C has approximately 6,652 mi² of available brown bear habitat (excluding high elevation and large water bodies) of which about 2,635 mi² is open to bear hunting (Table 11-1, Figure 11-1). The remaining 4,017 mi² of bear habitat is located in Katmai National Park (KNP), which is closed to hunting and provides a large area of refugia. However, bears have large home ranges and move freely across administrative boundaries. Seasonal and daily movements are largely the result of available food resources.

Table 11-3. Unit 9C land and hunting closure status. Bear habitat is considered below 2,700 ft elevation with large water bodies removed.

Land area	mi ²	km ²
Unit 9C area	7,687	19,909
Katmai National Park and Preserve	6,719	17,402
All Unit 9C bear habitat area	6,652	17,230
Bear habitat closed to hunting		
Katmai National Park	4,017	10,404
Total area closed	4,017	10,404
Unit 9C bear habitat open to hunting	2,635	6,825

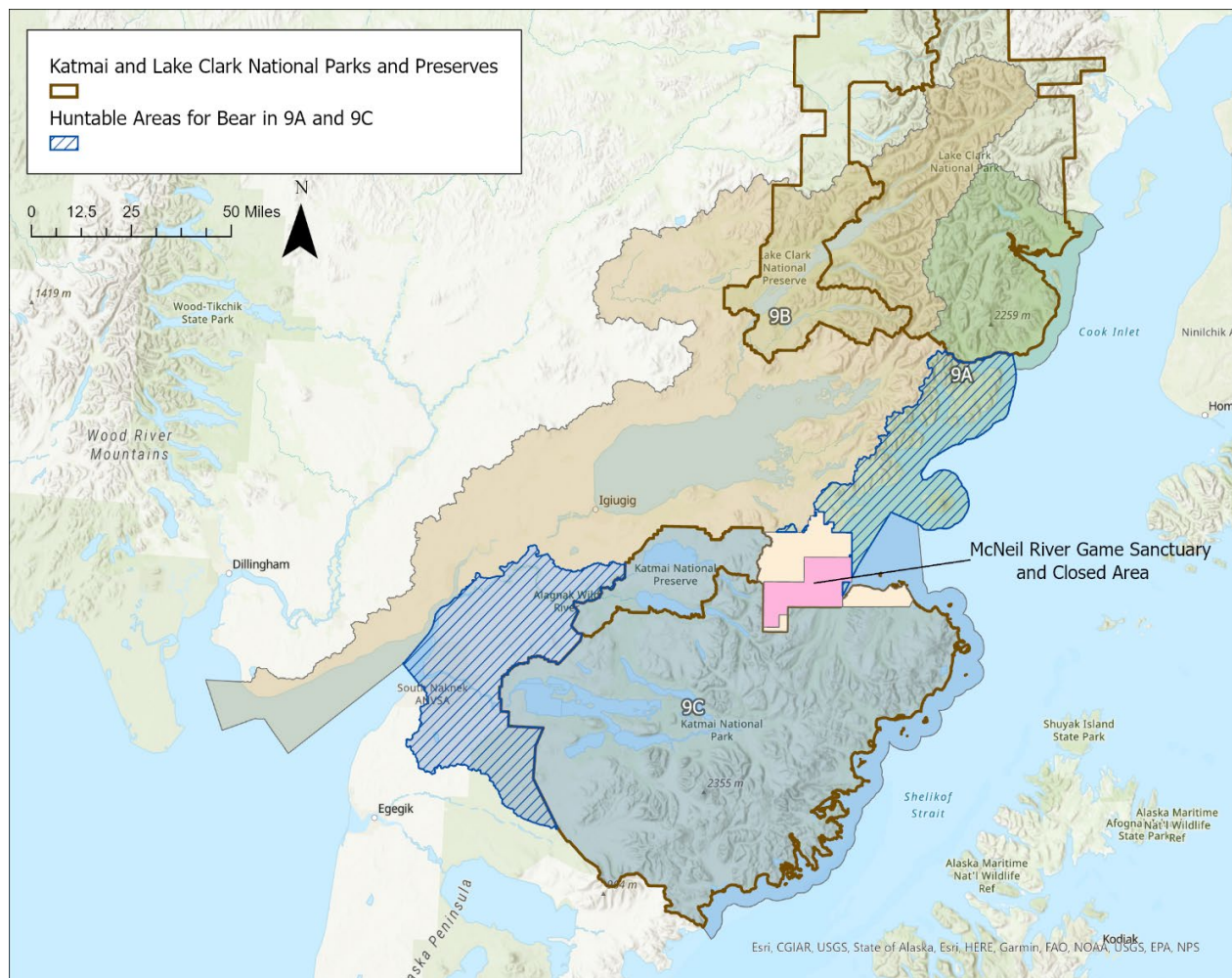


Figure 11-1. Unit 9C is composed primarily of Katmai National Park and Preserve and a western area of state and private lands.

Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Average annual harvest in Unit 9C during 2013–2023 was 15.3 brown bears (Table 11-2). Based on the abundance estimate for Unit 9C from 2004–2005, 15.3 bears represent a harvest rate of less than 1% for a population ranging from 1,593 to 2,389 bears. This is a sustainable harvest rate for brown bears. Nonresident and resident hunter harvest of brown bears varies annually in Unit 9C (Table 11-2).

Table 11-4. Unit 9C brown bear harvest and successful hunter participation by residency for biennial hunts RB368 and RB370, regulatory years 2013–2023.

Regulatory Year	Successful Residents	Successful Nonresidents	Total Successful	Total Hunters ^c
2013	12	8	20	59
2014	0	0	0	0
2015	20	23	43	75
2016	0	0	0	0
2017	6	25	31	60
2018	0	0	0	0
2019 ^a	13	5	18	41
2020 ^b	13	5	18	31
2021	6	11	17	38
2022	0	0	0	0
2023	7	14	21	44

^a Fall season only

^b Spring (2021) season only

^c Total hunters include unsuccessful resident and nonresident hunters.

Average ages of both male and female bears in the harvest are trending upwards since 2000 (Figure 11-2, data does not include regulatory years 2022–2023). Average skull sizes of both male and female bears are consistent through the period (Figure 11-3). Brown bear harvest reached a peak of 70 bears harvested during the 2002–2003 hunting seasons and has decreased since then (Figure 11-4). Average days hunted per hunter has remained stable.

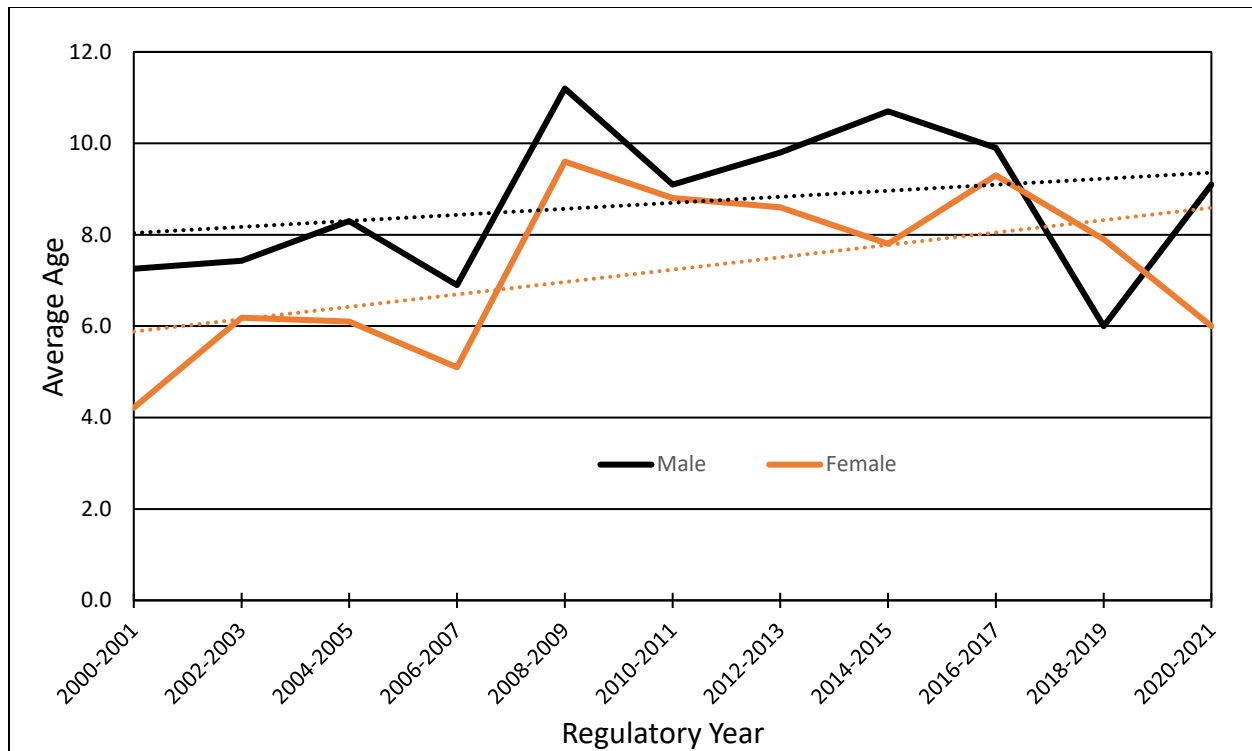


Figure 11-2. Average ages of male and female brown bears harvested in Unit 9C, regulatory years 2001–2021.

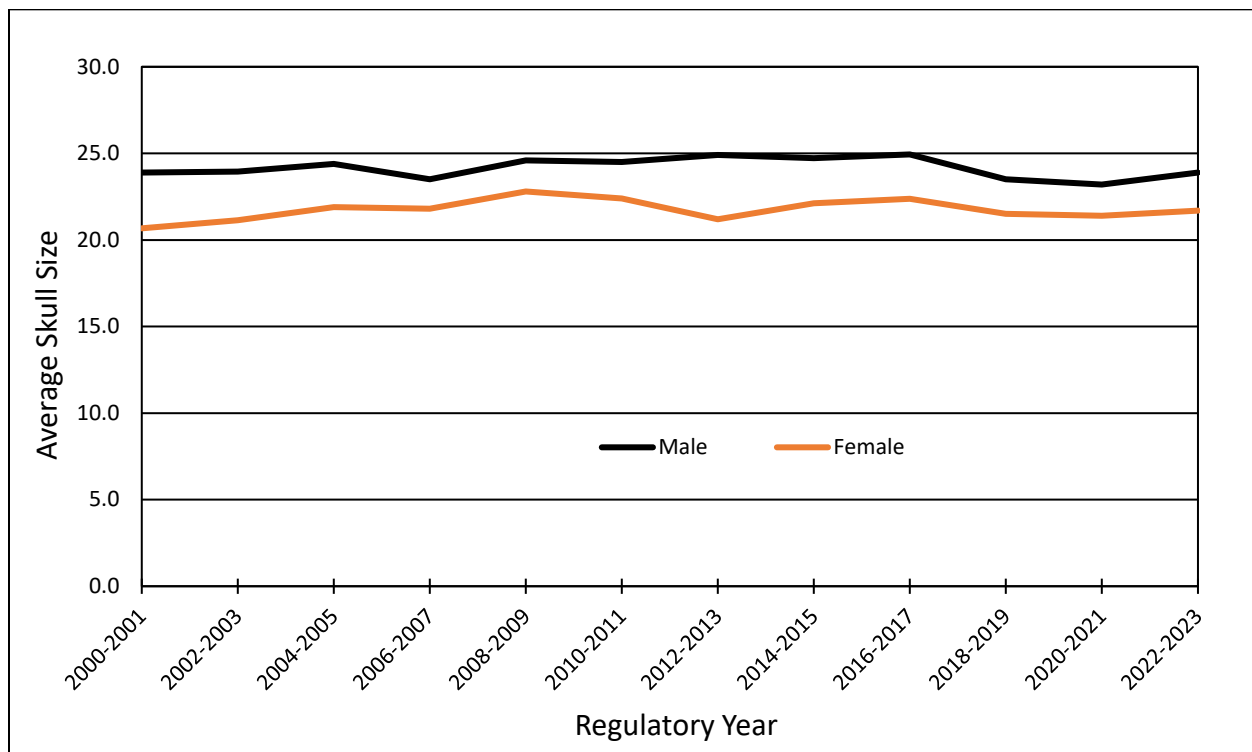


Figure 11-3. Average skull sizes of male and female brown bears harvested in Unit 9C, regulatory years 2001–2023.

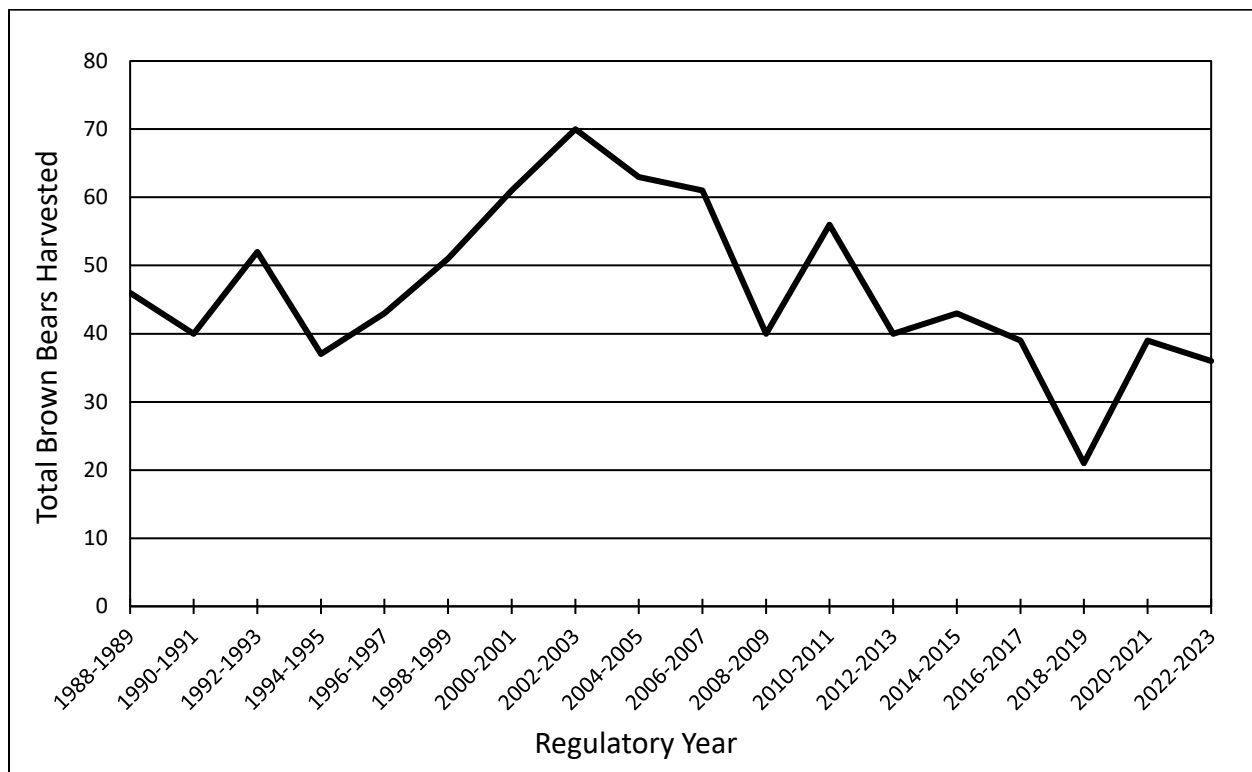


Figure 11-4. Total numbers of brown bears harvested in Unit 9C, regulatory years 1989–2023.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the unnecessary reduction in bear hunting opportunity created by shortening the brown bear season dates in Unit 9C. The department is **NEUTRAL** on the allocative aspects of this proposal. Average ages and skull sizes are not showing any declines and there are no conservation concerns with the brown bear population in Unit 9C due to the large area of refugia Katmai National Park provides. Shortening the season will not decrease harvest if the same pattern is seen as in Units 9D and 9E, where harvest just became more concentrated.

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

PROPOSAL 12 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents

PROPOSED BY: Jordan Wallace & Dave Leonard

WHAT WOULD THE PROPOSAL DO? The proposal would change the brown bear fall hunting season dates in Units 9D and 9E from October 7–October 21 to October 1–October 21 for residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368, RB369, and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring since 1976.

Units 9D and 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25.

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9, open year-round with a bag limit of 1 bear per regulatory year.

There is a negative customary and traditional use (C&T) finding for brown bear in Unit 9D but there is a positive C&T finding for Unit 9E with an amount reasonably necessary for subsistence of 10–15 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunter opportunity, and potentially an increase in the brown bear harvest. There are currently no conservation concerns with the brown bear population in Units 9D and 9E and no expected user group conflicts. Lengthening the season to what it had been previously addresses a concern for hunter crowding during the hunting season and allows hunters to hunt during better weather the first week of October.

BACKGROUND: Units 9D and 9E have approximately 15,330 mi² of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi²) (Figure 12-1). Izembek National Wildlife Refuge, Alaska Peninsula, and Becharof National Wildlife Refuges are also included in Units 9D and 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Since then, participation has fluctuated, with a spike after the Covid-19 pandemic (Figure 12-2), but an overall downward trend. Percent success has stayed stable around 60%. The majority of harvest comes from guided nonresidents.

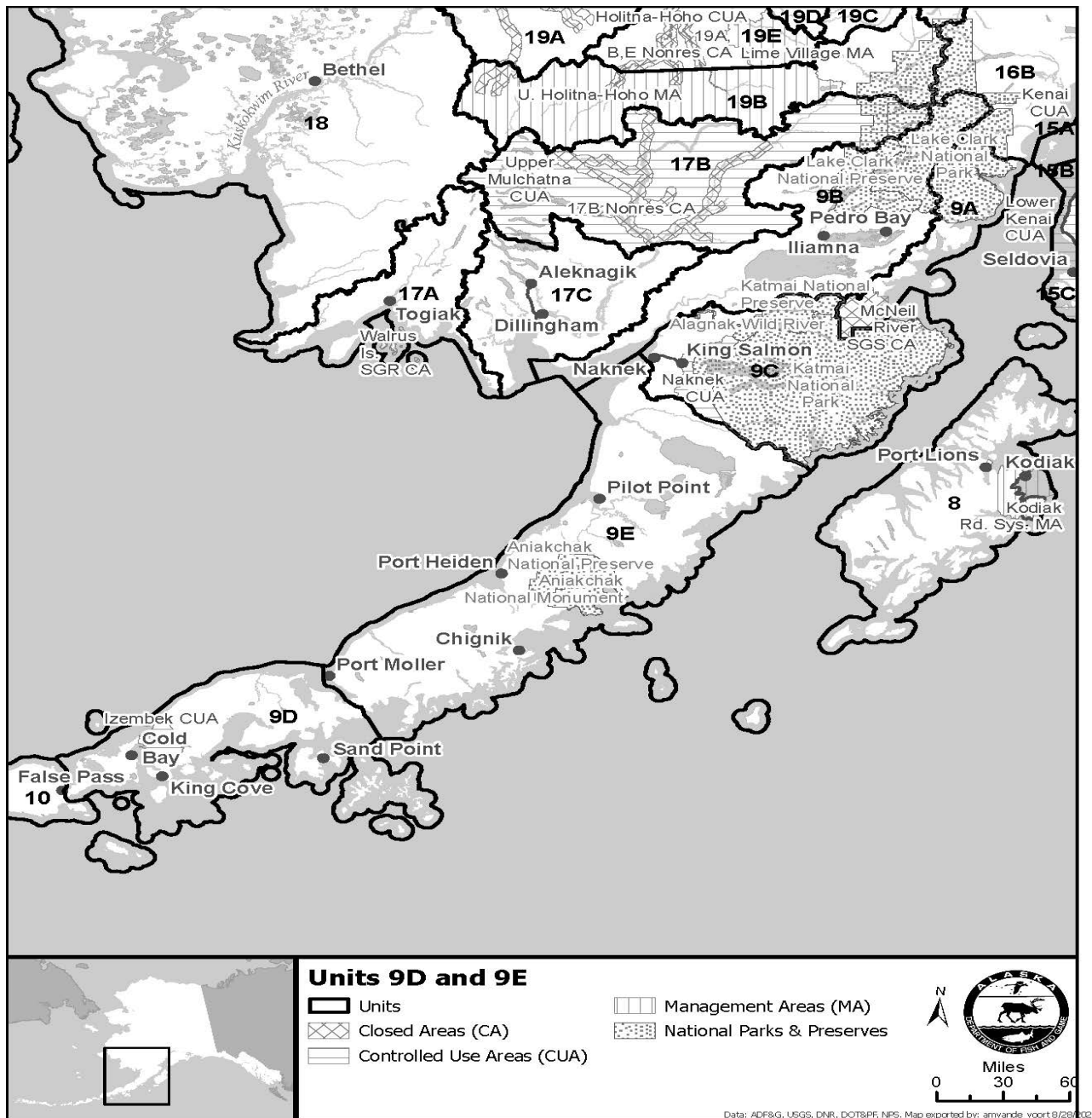


Figure 12-1. Game Management Units 9D and 9E on the Alaska Peninsula.

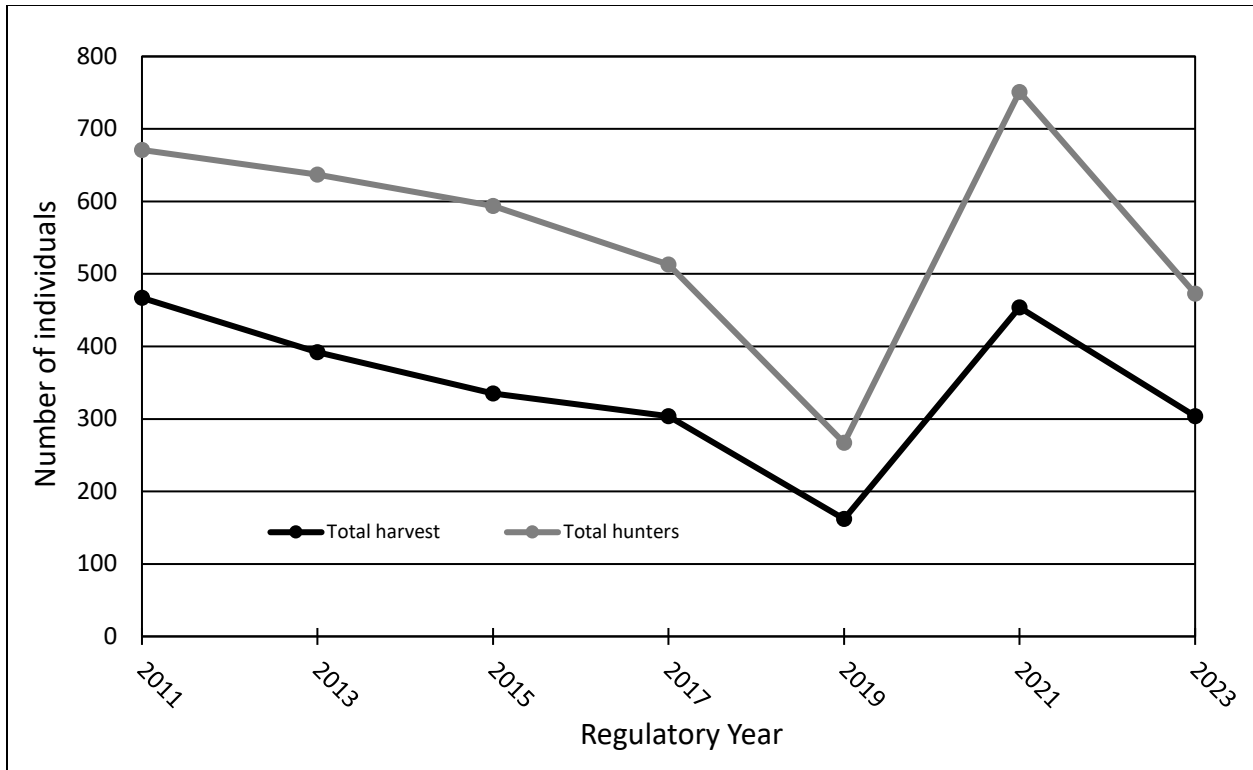


Figure 12-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

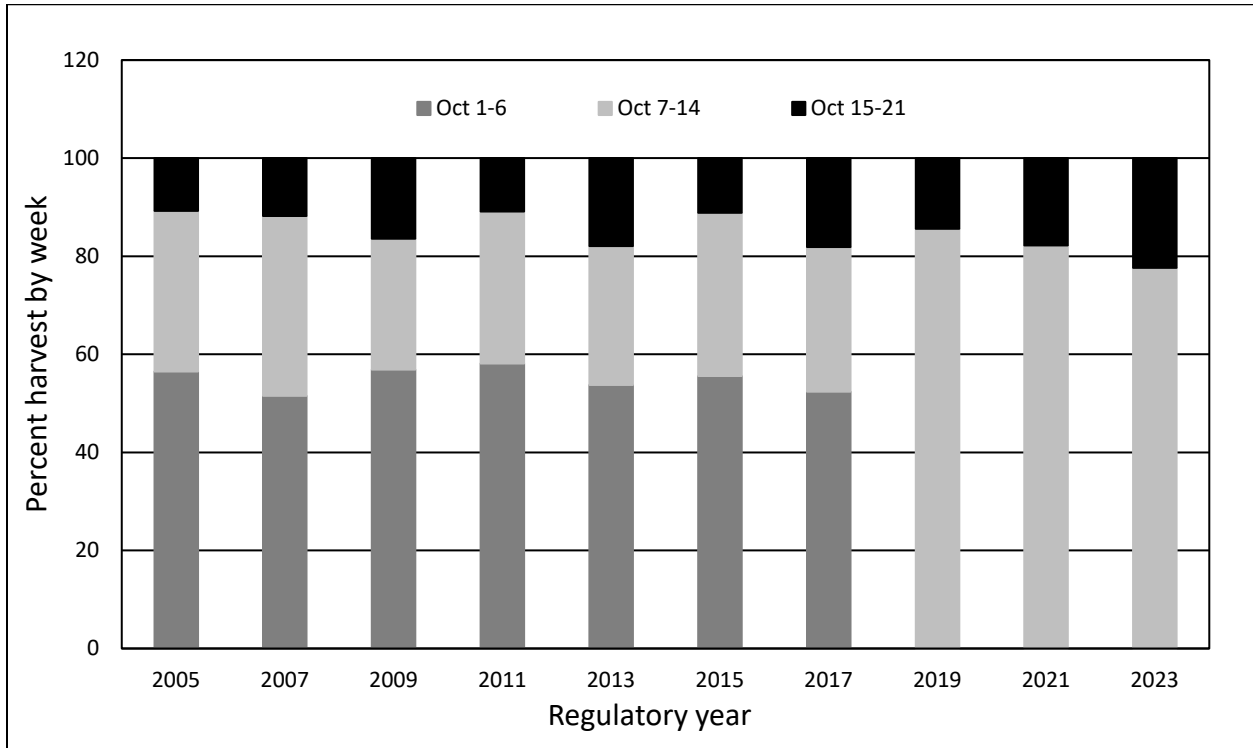


Figure 12-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

Season dates for brown bear in Units 9D and 9E were shortened to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Resident season dates were lengthened to May 10–May 31 beginning regulatory year 2021. Season dates were shortened due to concerns about sudden increases in percent male bears over 8-years old and percent adult females in the harvest. A decrease in harvest was not seen when the seasons were shortened. Instead, harvest during the first week of October was added to the second week’s harvest (Figure 12-3). Harvest during the third week of the fall season showed an increase to 22% during 2023 but was otherwise between 10–20%.

Skull measurements and ages are obtained from harvested brown bears to track bear harvest in absence of density or population estimates. Average skull size of harvested brown bears has been stable since 2000 (Figure 12-4). Average age of harvested males reached an all-time high in 2015 and females reached an all-time high in 2013 (Figure 12-5). Age data is not available for 2023 yet. Male age dropped during 2019 when the Covid-19 pandemic caused travel restrictions and harvested bear numbers dropped but increased again in 2021. Average male skull size showed only a slight increase when average male ages were at all-time highs. Current management objectives include sustaining a harvest composed of 60% males with a total of 50 males 8-years old or older taken during the combined fall and spring seasons in Unit 9.

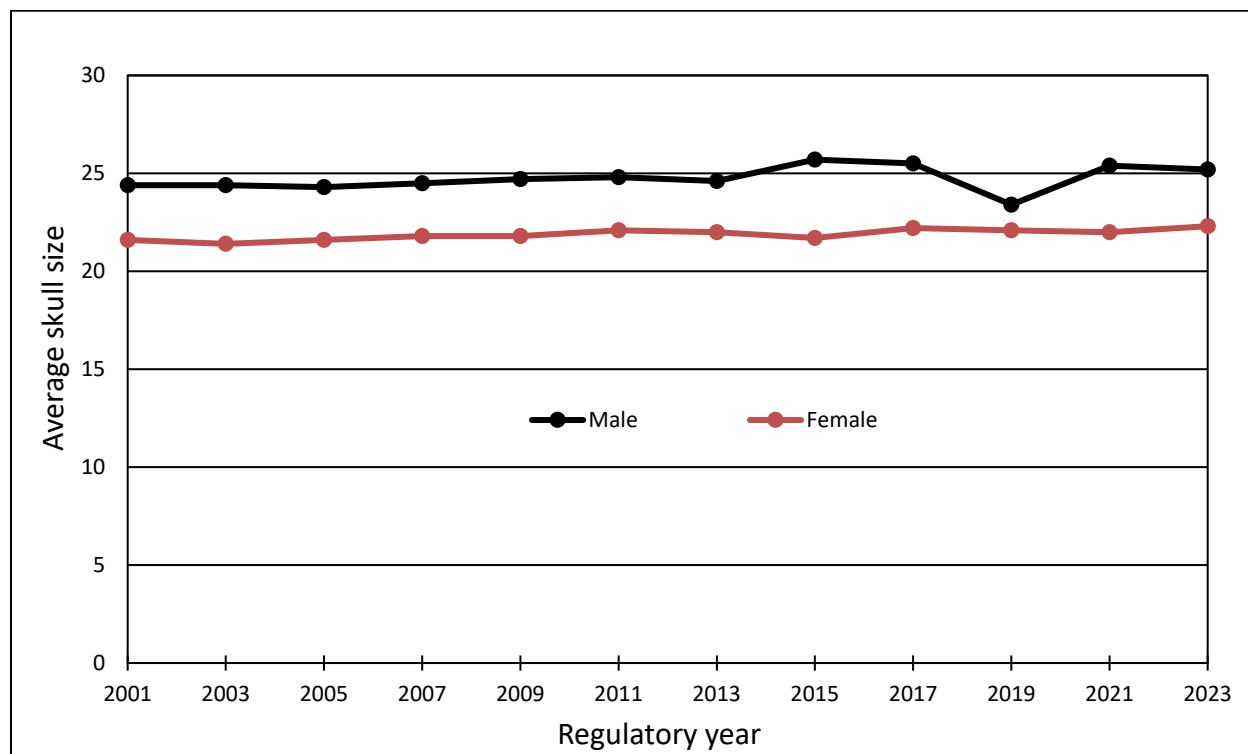


Figure 12-4. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

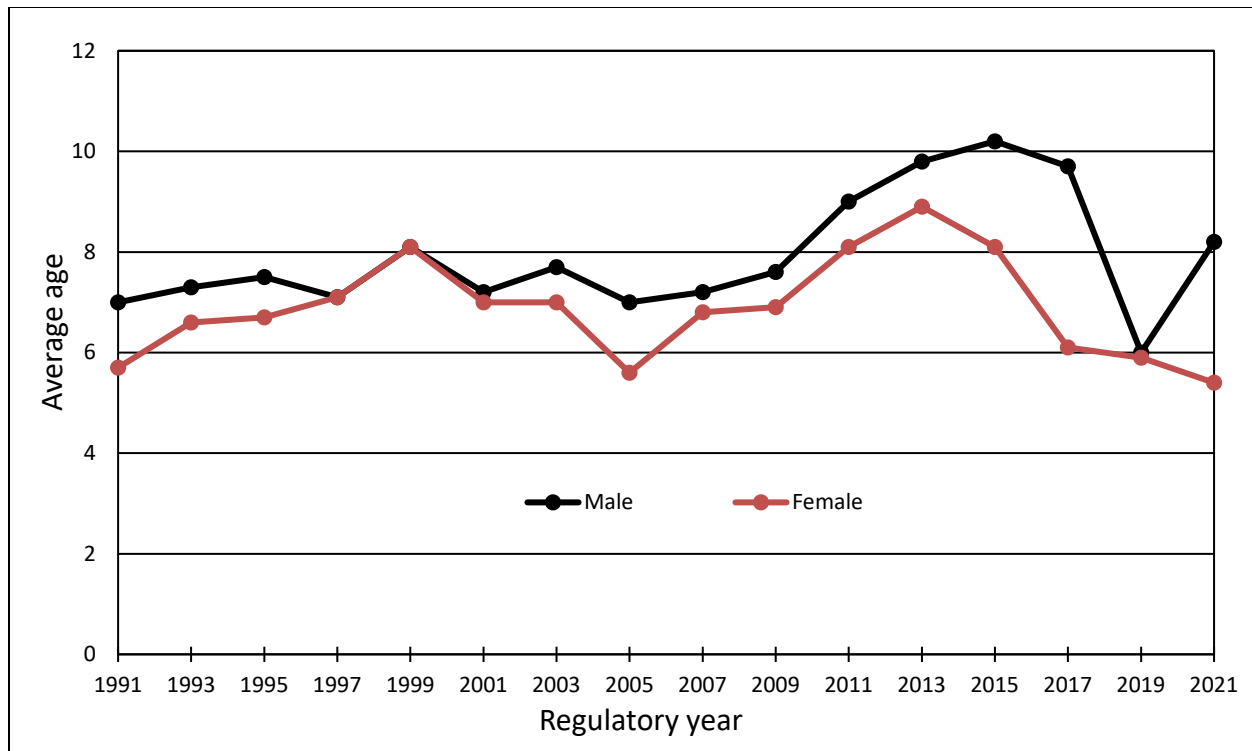


Figure 12-5. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

Percentage of male brown bears in the harvest has been at or above 60% since 1980 and 9E alone typically has more than 50 males 8-years old or older taken each season. Percentage of males older than 8-years old in the harvest dropped below 34% in 2019 and 2021 and adult females in the harvest decreased (Figure 12-6). The drop in age of harvested bears may indicate a new cohort of younger aged bears entering the population.

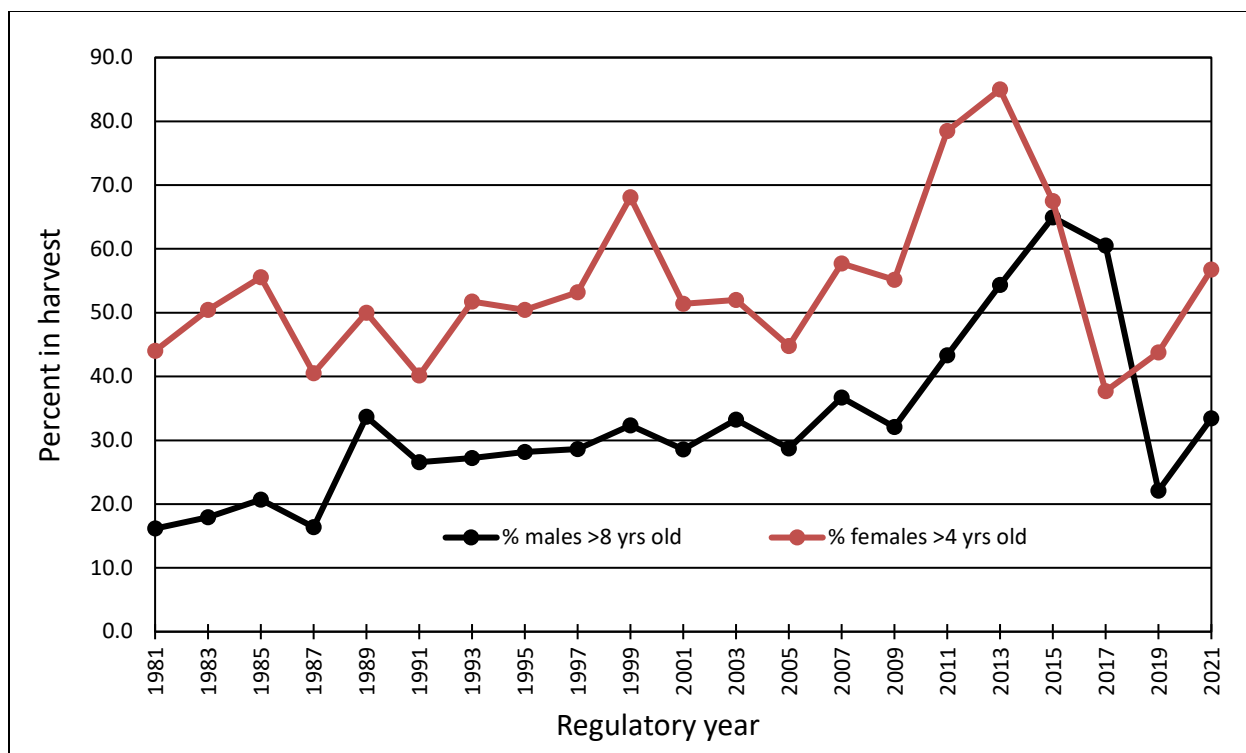


Figure 12-6. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Approximately the same amount of effort (number of hunters and days hunted) has been put forth during each open hunting season since 2017. There are no conservation issues with brown bears in Units 9D or 9E. The existing regulations were intended to decrease harvest; however, there has been no decrease in harvest since they were implemented.

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

PROPOSALS 13 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents, and lengthen the nonresident spring hunting season.

PROPOSED BY: Dan Montgomery

WHAT WOULD THE PROPOSAL DO? The proposal would change the biennial fall brown bear hunting season dates in Units 9D and 9E from October 7–October 21 for residents and nonresidents to October 1–October 21 for both residents and nonresidents. It would also change biennial spring season for nonresidents from May 10–May 25 to May 10–May 31. Thus, it would

add 6 days of hunting opportunity during the fall for both residents and nonresidents and 6 days in the spring for nonresidents only.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368, RB369, and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring since 1976.

Units 9D and 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9D&E, open year-round with a bag limit of 1 bear per regulatory year.

There is a negative customary and traditional use (C&T) finding for brown bear in Unit 9D but there is a positive C&T finding for Unit 9E with an amount reasonably necessary for subsistence of 10–15 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunter opportunity and potentially an increase in the brown bear harvest. There are currently no conservation concerns with the brown bear population in Units 9D and 9E and no expected user group conflicts. Lengthening the seasons to what they had been previously addresses a concern for hunter crowding during the hunting season and allows hunters to hunt during potentially better weather the first week of October and the end of May.

BACKGROUND: Units 9D and 9E have approximately 15,330 mi² of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi²) (Figure 12-1). Izembek National Wildlife Refuge, Alaska Peninsula, and Becharof National Wildlife Refuges are also included in Units 9D and 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Since then, participation has fluctuated, with a spike after the Covid-19 pandemic (Figure 13-2), but an overall downward trend. Percent success has stayed stable around 60%. The majority of harvest comes from guided nonresidents.

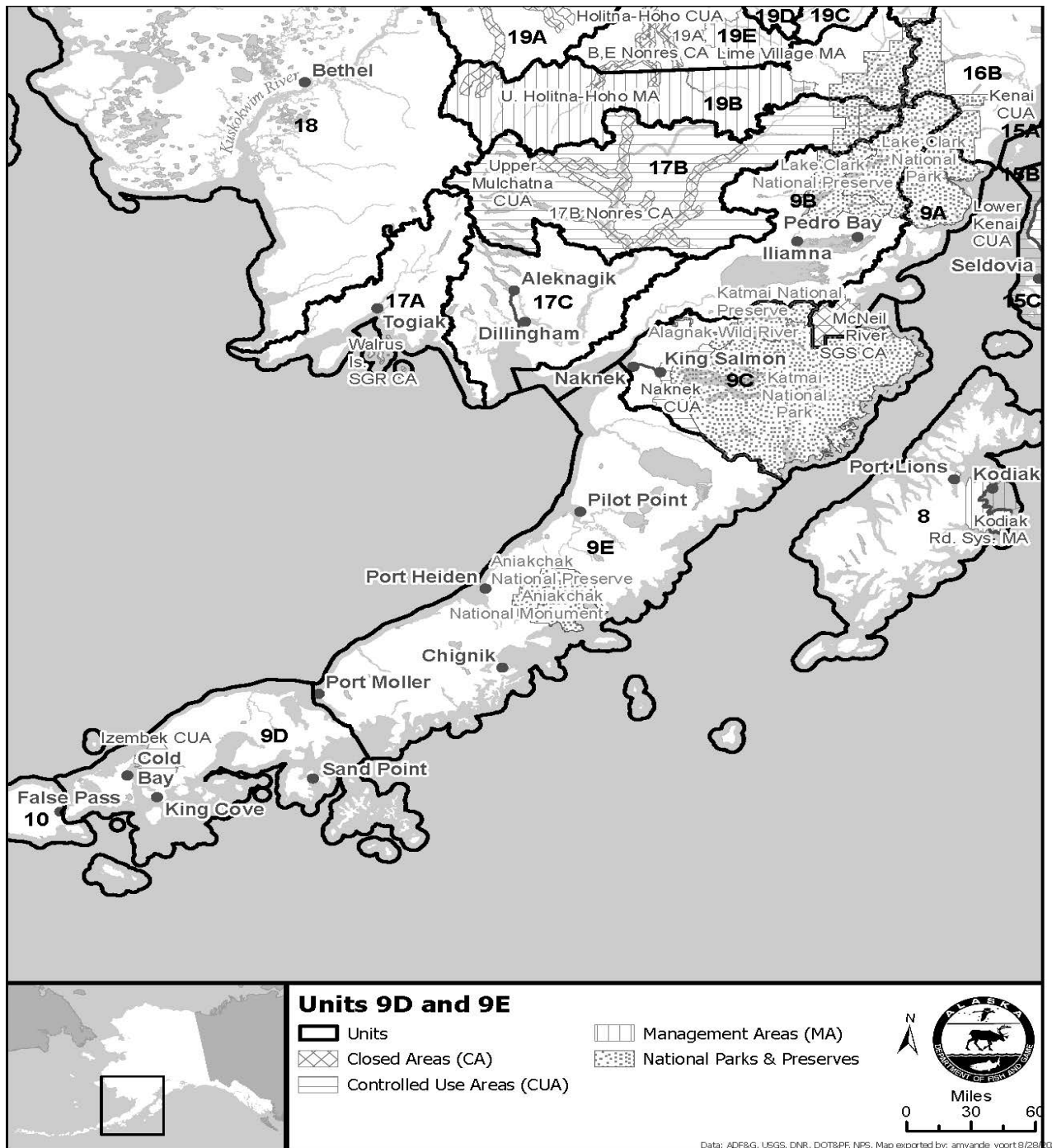


Figure 13-1. Game Management Units 9D and 9E on the Alaska Peninsula.

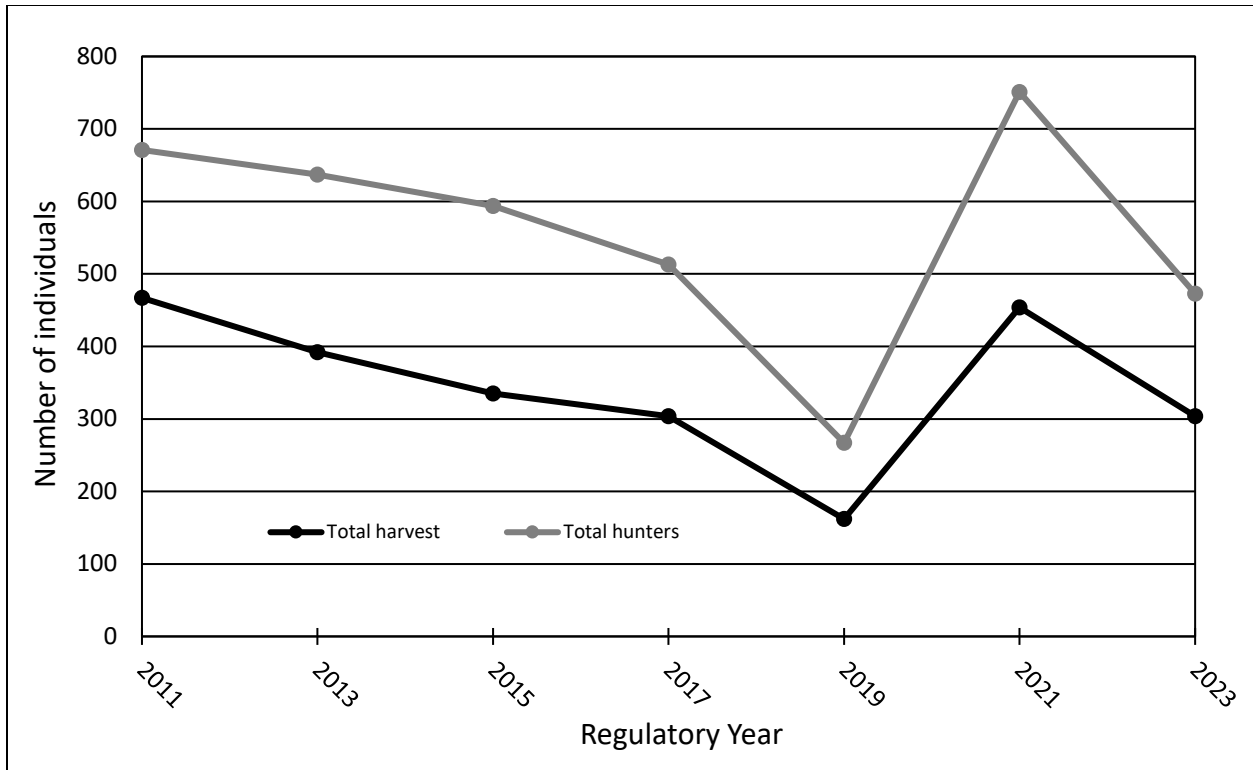


Figure 13-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

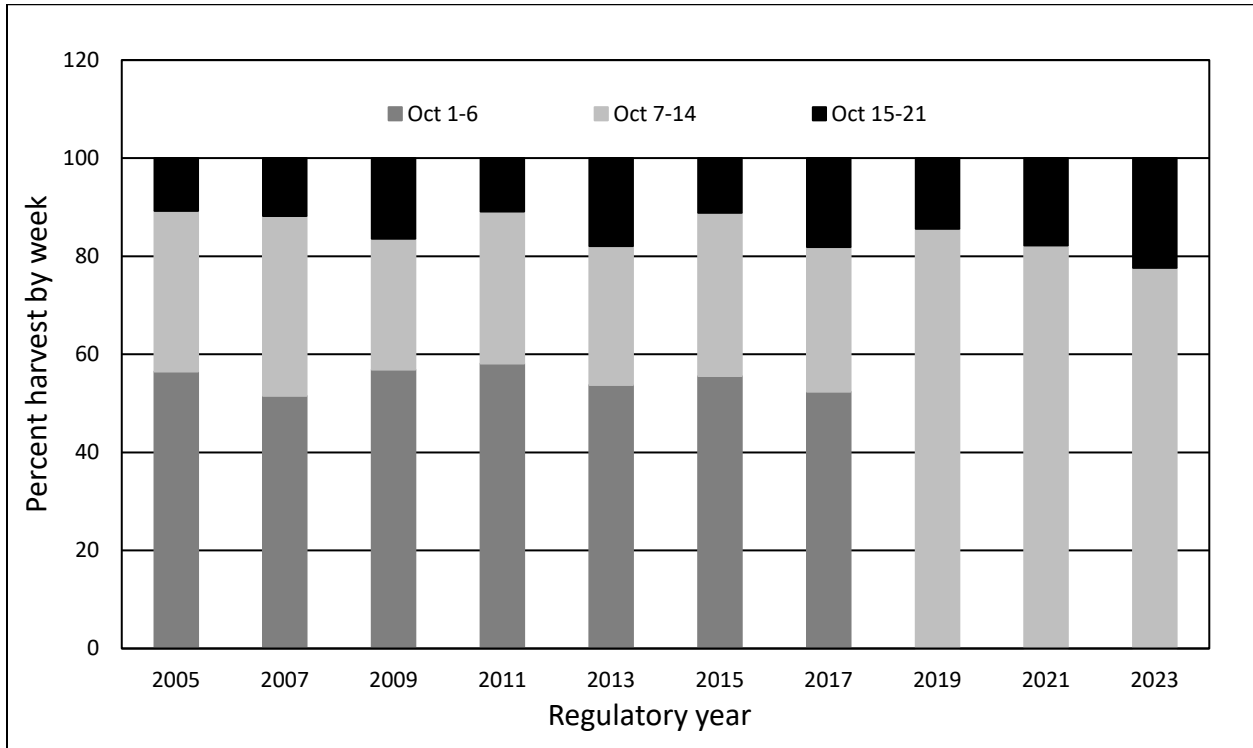


Figure 13-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

Season dates for brown bear in Units 9D and 9E were shortened to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Resident season dates were lengthened to May 10–May 31 beginning regulatory year 2021. Season dates were shortened due to concerns about sudden increases in percent male bears over 8-years old and percent adult females in the harvest. A decrease in harvest was not seen when the seasons were shortened. Instead, harvest during the first week of October was added to the second week’s harvest (Figure 13-3). Harvest during the third week of the fall season showed an increase to 22% during 2023 but was otherwise between 10–20%. Harvest chronology during the spring season is more variable and no real trends can be seen during regulatory years 2013–2017 when the season was lengthened (Figure 13-4). Resident harvest during May 26–31 was negligible during the 2023 spring season.

Skull measurements and ages are obtained from harvested brown bears to track bear harvest in absence of density or population estimates. Average skull size of harvested brown bears has been stable since 2000 (Figure 13-5). Average age of harvested males reached an all-time high in 2015 and females reached an all-time high in 2013 (Figure 13-6). Age data is not available for 2023 yet. Male age dropped during 2019 when the Covid-19 pandemic caused travel restrictions and harvested bear numbers dropped but increased again in 2021. Average male skull size showed only a slight increase when average male ages were at all-time highs. Current management objectives include sustaining a harvest composed of 60% males with a total of 50 males 8-years old or older taken during the combined fall and spring seasons in Unit 9.

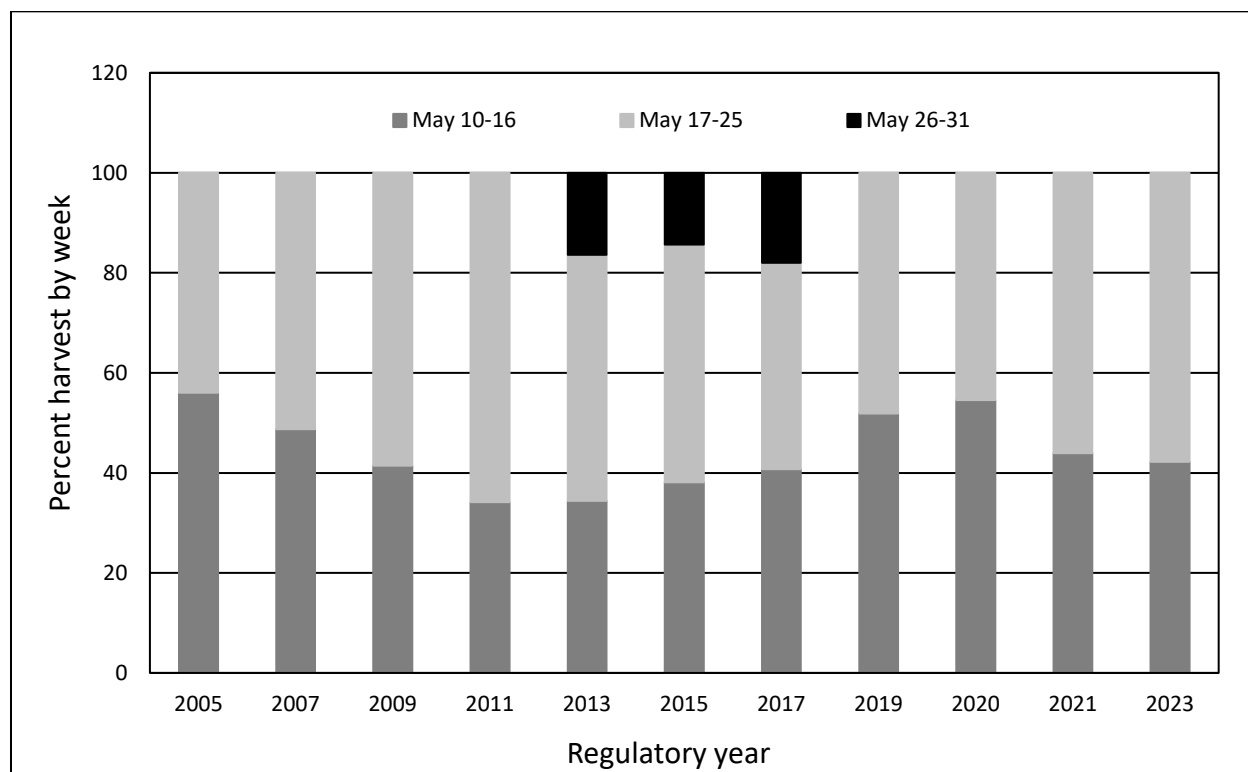


Figure 13-4. Spring harvest chronology for Units 9D and 9E, RY2005–2023.

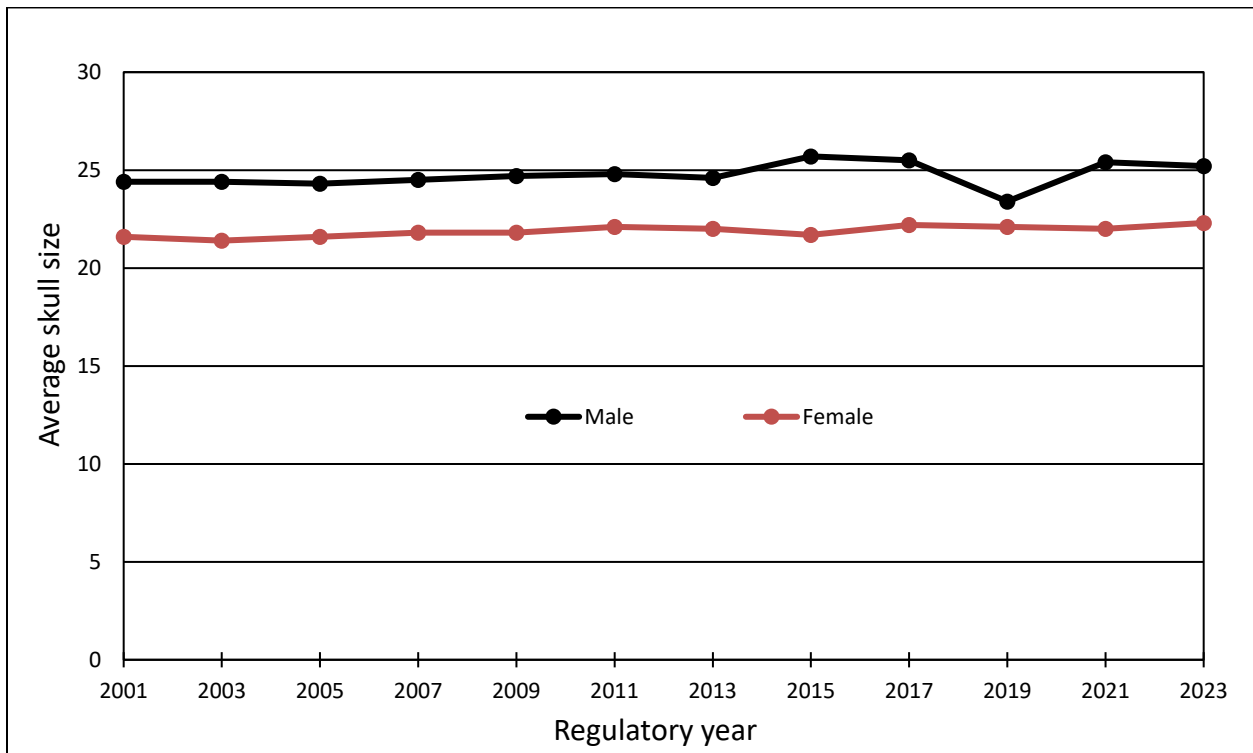


Figure 13-5. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

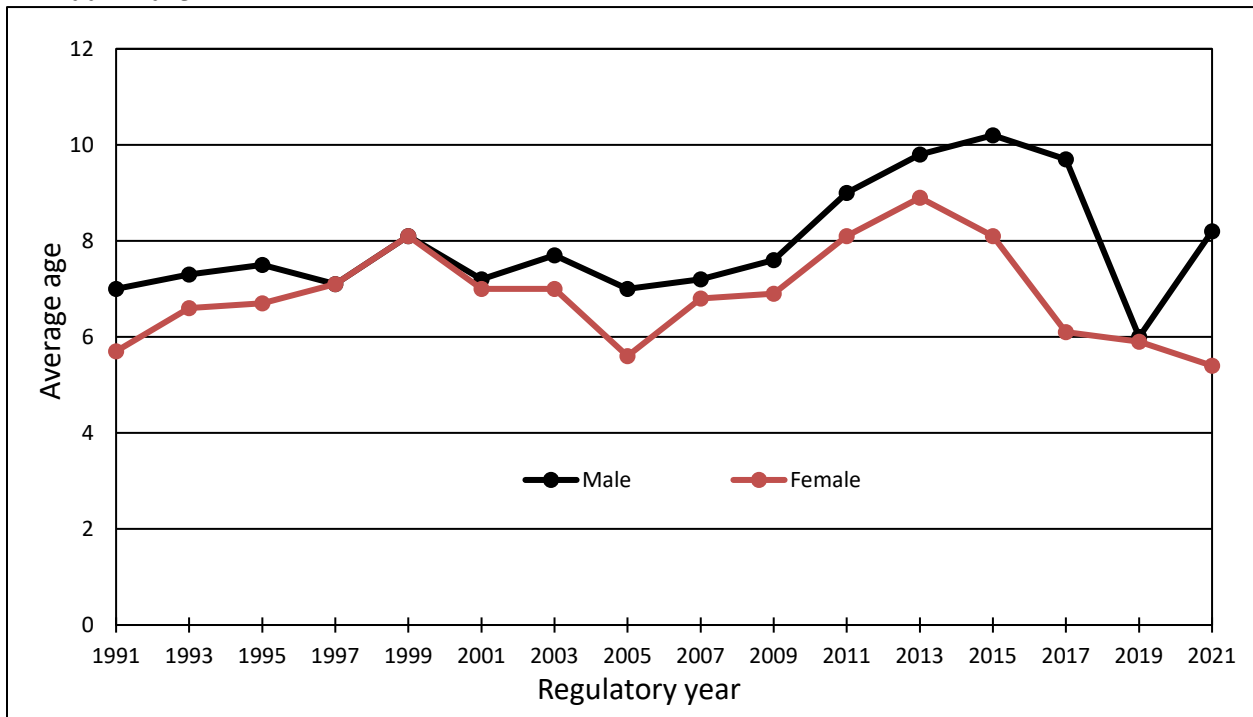


Figure 13-6. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

Percentage of male brown bears in the harvest has been at or above 60% since 1980 and 9E alone typically has more than 50 males 8-years old or older taken each season. Percentage of males older than 8-years old in the harvest dropped below 34% in 2019 and 2021 and adult females in the harvest decreased (Figure 13-7). The drop in age of harvested bears may indicate a new cohort of younger aged bears entering the population.

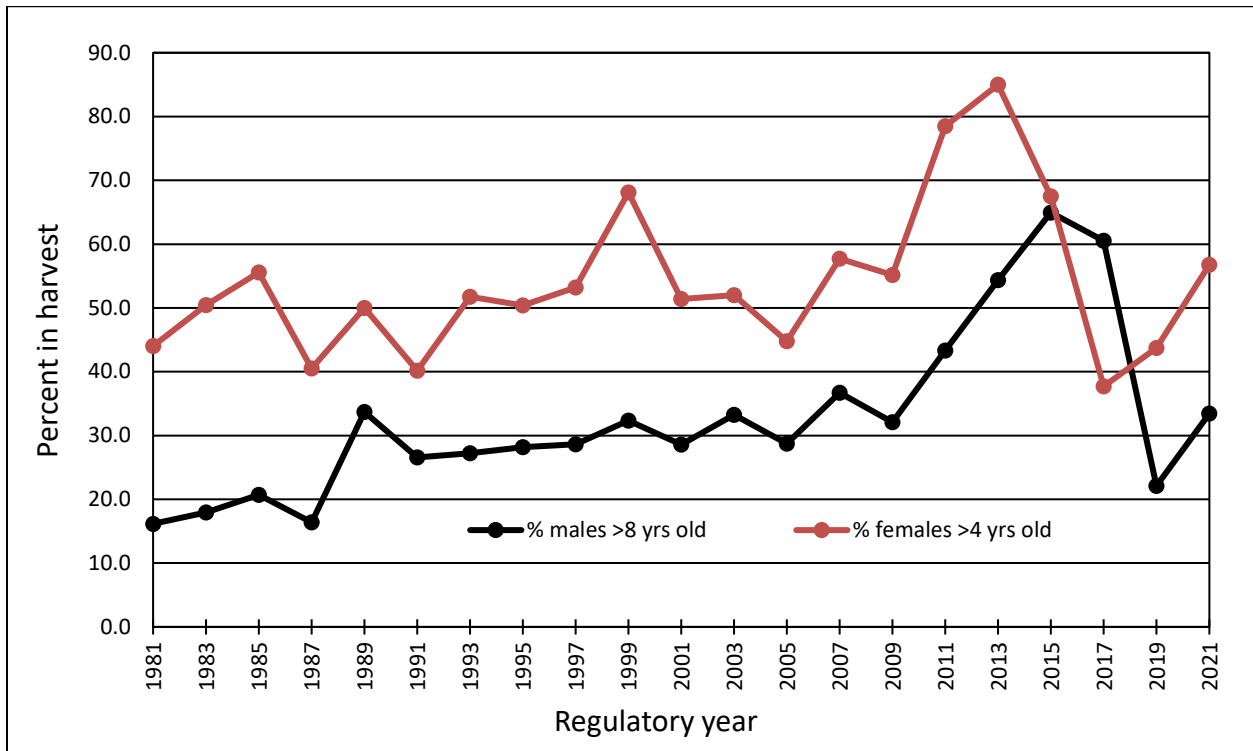


Figure 13-7. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Approximately the same amount of effort (number of hunters and days hunted) has been put forth during each open hunting season since 2017. There are no conservation issues with brown bears in Units 9D or 9E. The existing regulations were intended to decrease harvest; however, there has been no decrease in harvest since they were implemented. Adoption of this proposal will not impact the existing subsistence registration hunt or the near-village hunt.

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

PROPOSAL 14 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents.

PROPOSED BY: David Byrd

WHAT WOULD THE PROPOSAL DO? The proposal would change the biennial fall brown bear hunting season dates in Units 9D and 9E from October 7–October 21 to October 1–October 21 for residents and nonresidents. Thus, it would add 6 days of hunting opportunity for both residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368, RB369, and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring since 1976. Units 9D and 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9, open year-round with a bag limit of 1 bear per regulatory year.

There is a negative customary and traditional use (C&T) finding for brown bear in Unit 9D but there is a positive C&T finding for Unit 9E with an amount reasonably necessary for subsistence of 10–15 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunter opportunity, and potentially an increase in the brown bear harvest. There are currently no conservation concerns with the brown bear population in Units 9D and 9E and no expected user group conflicts. Lengthening the season to what it had been previously addresses a concern for hunter crowding during the hunting season and allows hunters to hunt during potentially better weather the first week of October.

BACKGROUND: Units 9D and 9E have approximately 15,330 mi² of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi²) (Figure 14-1). Izembek National Wildlife Refuge, Alaska Peninsula, and Becharof National Wildlife Refuges are also included in Units 9D and 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter

participation. Since then, participation has fluctuated, with a spike after the Covid-19 pandemic (Figure 14-2), but an overall downward trend. Percent success has stayed stable around 60%. The majority of harvest comes from guided nonresidents.

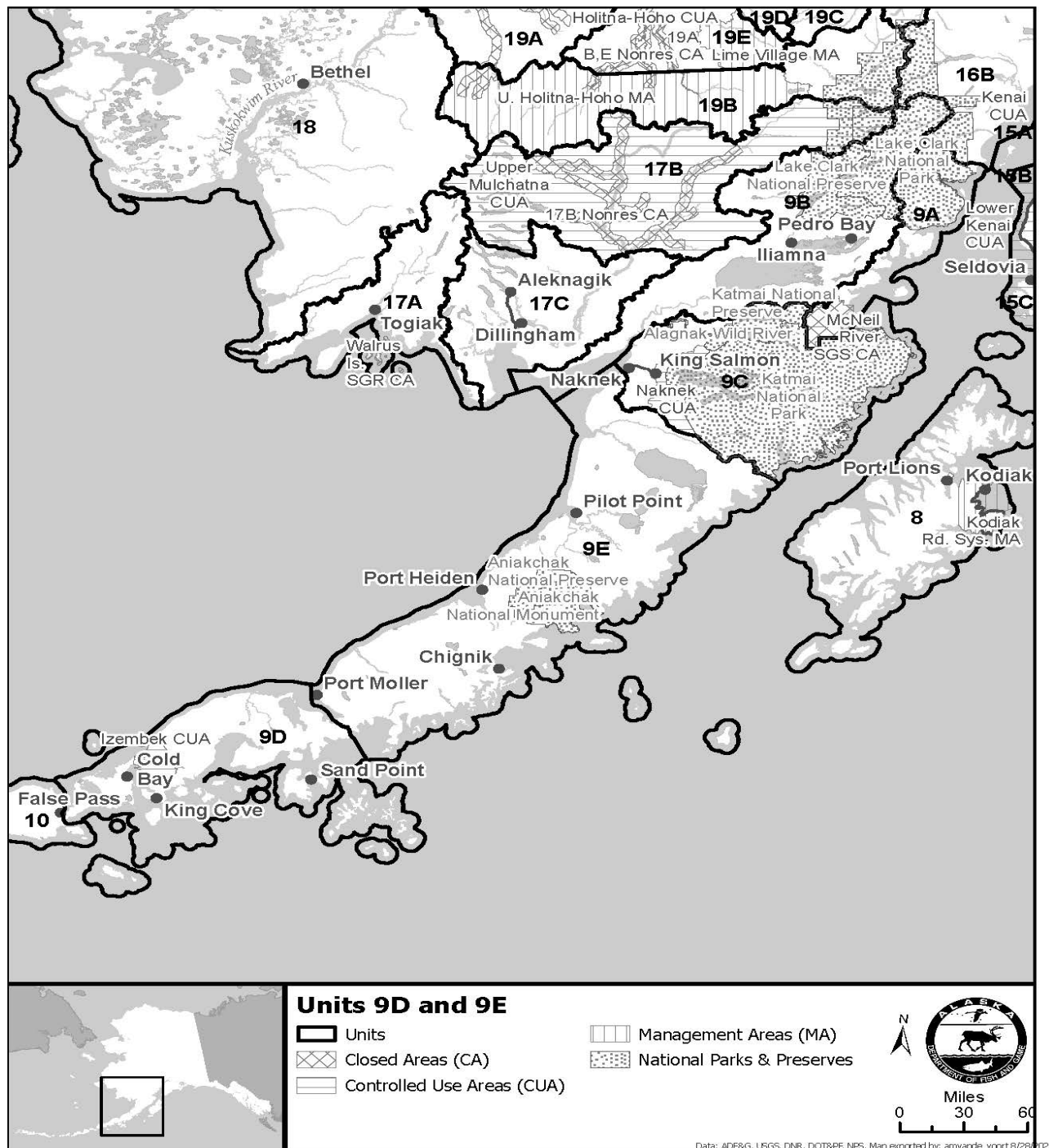


Figure 14-1. Game Management Units 9D and 9E on the Alaska Peninsula.

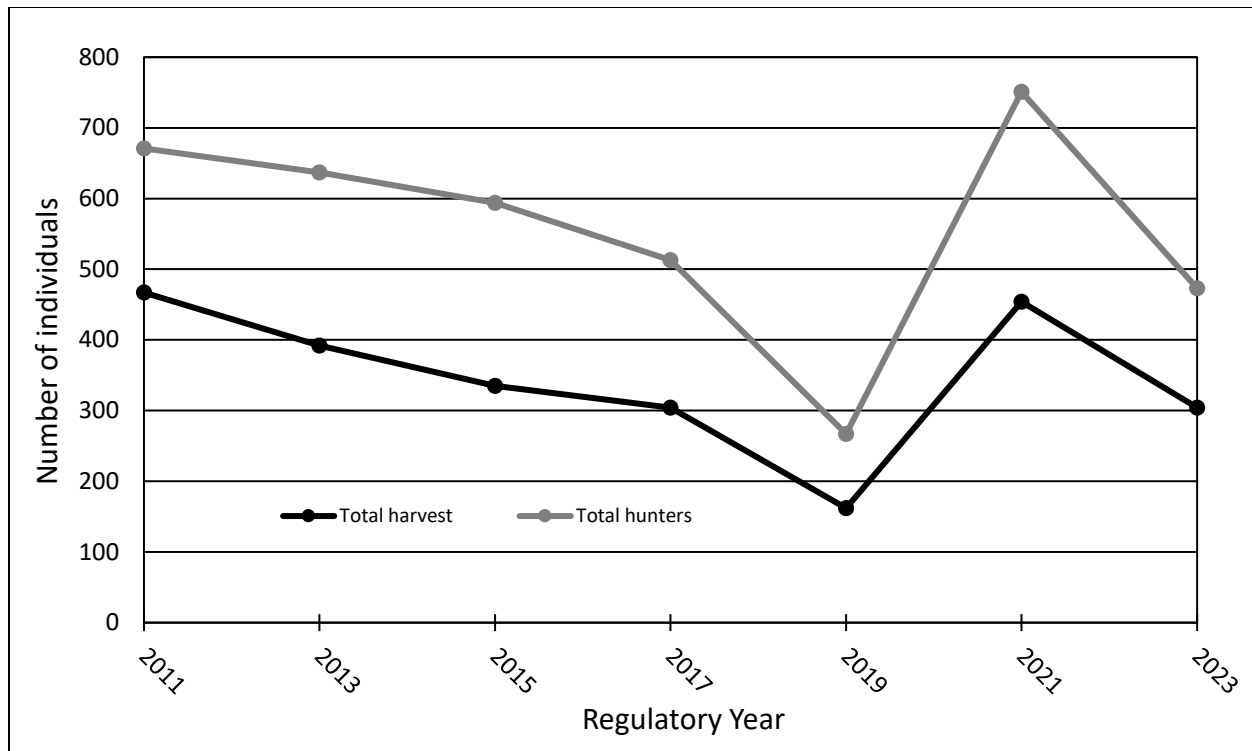


Figure 14-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

Season dates for brown bear in Units 9D and 9E were shortened to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Resident season dates were lengthened to May 10–May 31 beginning regulatory year 2021. Season dates were shortened due to concerns about sudden increases in percent male bears over 8-years old and percent adult females in the harvest. A decrease in harvest was not seen when the seasons were shortened. Instead, harvest during the first week of October was added to the second week’s harvest (Figure 14-3). Harvest during the third week of the fall season showed an increase to 22% during 2023 but was otherwise between 10–20%.

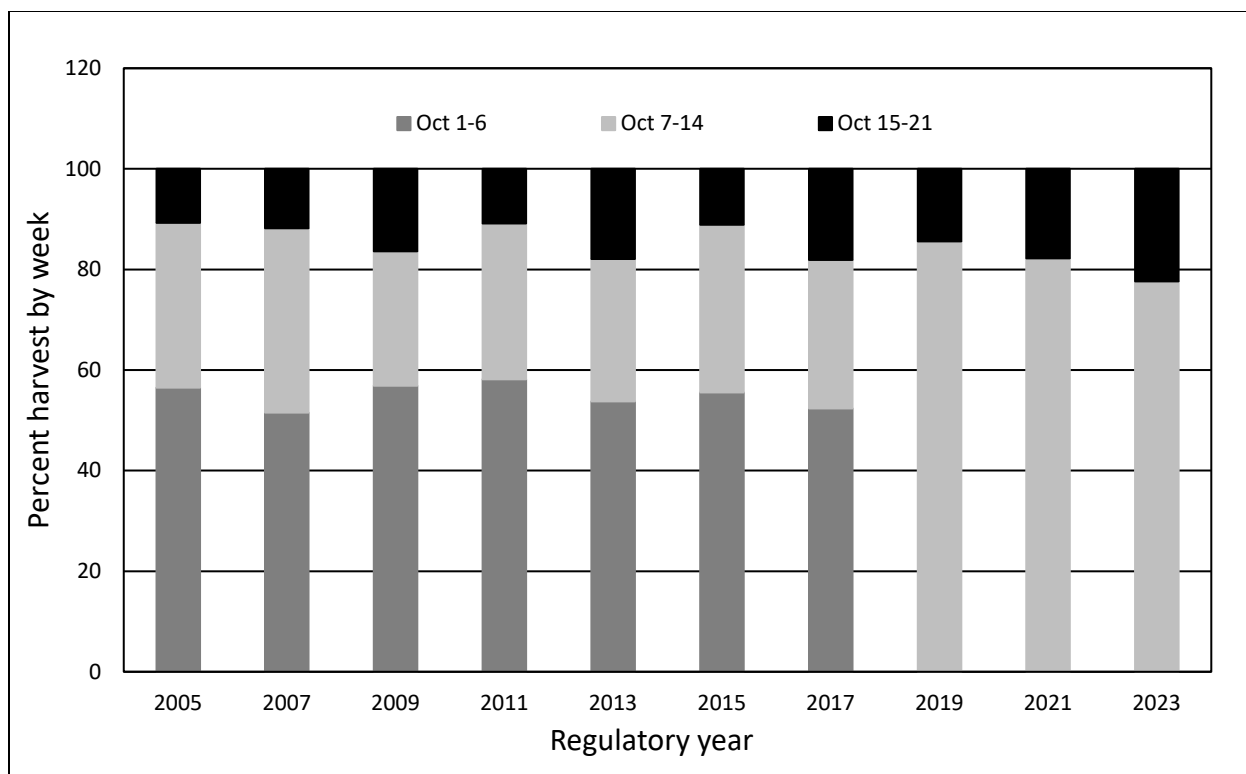


Figure 14-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

Skull measurements and ages are obtained from harvested brown bears to track bear harvest in absence of density or population estimates. Average skull size of harvested brown bears has been stable since 2000 (Figure 14-4). Average age of harvested males reached an all-time high in 2015 and females reached an all-time high in 2013 (Figure 14-5). Age data is not available for 2023 yet. Male age dropped during 2019 when the Covid-19 pandemic caused travel restrictions and harvested bear numbers dropped but increased again in 2021. Average male skull size showed only a slight increase when average male ages were at all-time highs. Current management objectives include sustaining a harvest composed of 60% males with a total of 50 males 8-years old or older taken during the combined fall and spring seasons in Unit 9.

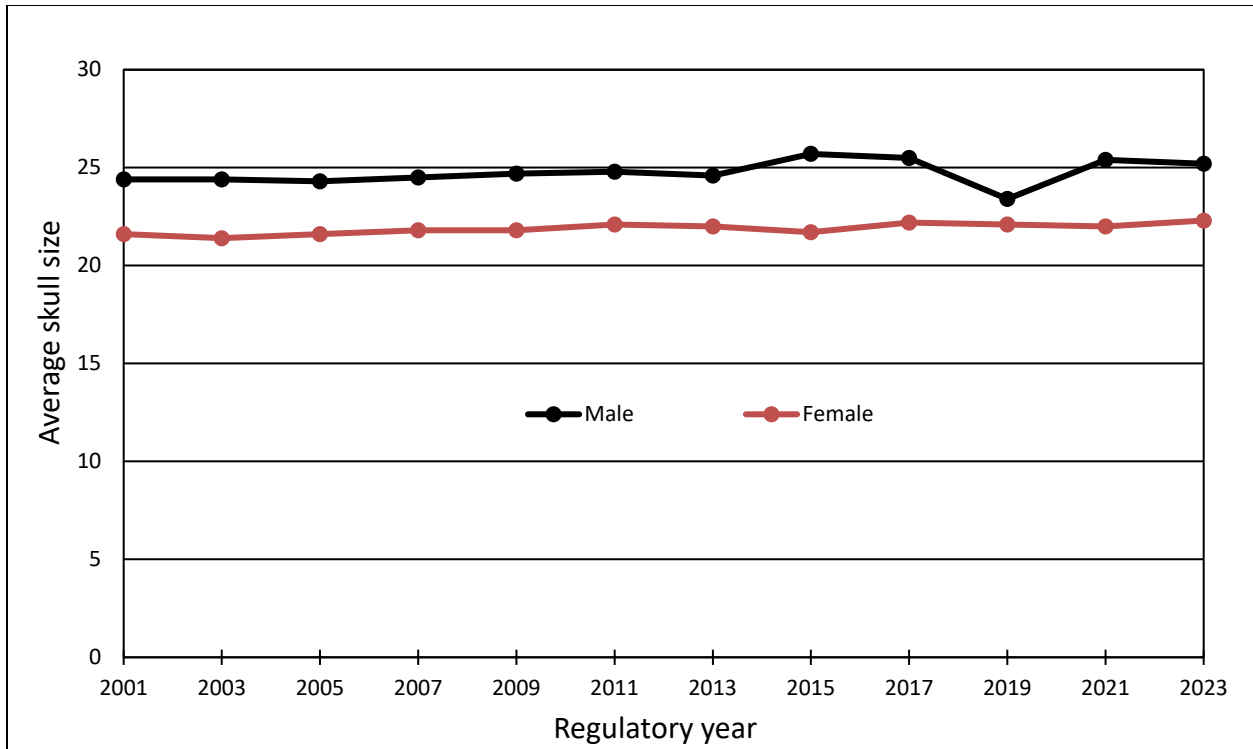


Figure 14-4. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

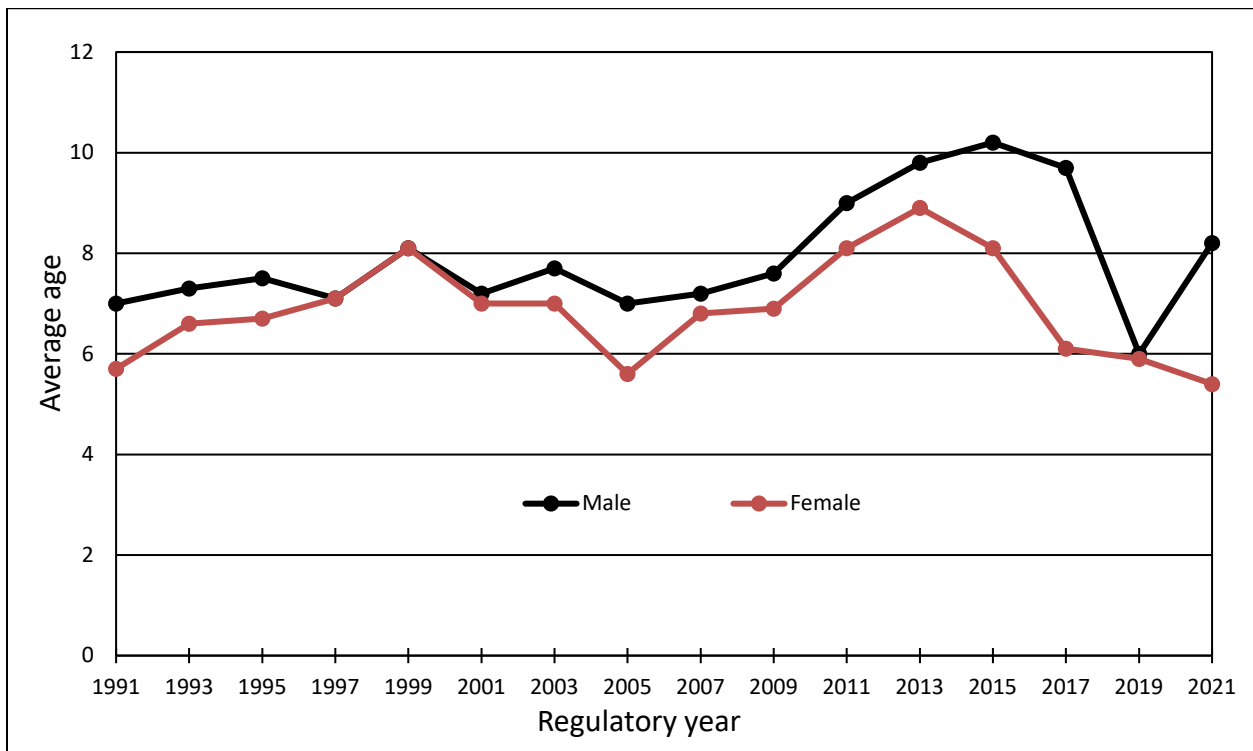


Figure 14-5. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

Percentage of male brown bears in the harvest has been at or above 60% since 1980 and 9E alone typically has more than 50 males 8-years old or older taken each season. Percentage of males older than 8-years old in the harvest dropped below 34% in 2019 and 2021 and adult females in the harvest decreased (Figure 14-6). The drop in age of harvested bears may indicate a new cohort of younger aged bears entering the population.

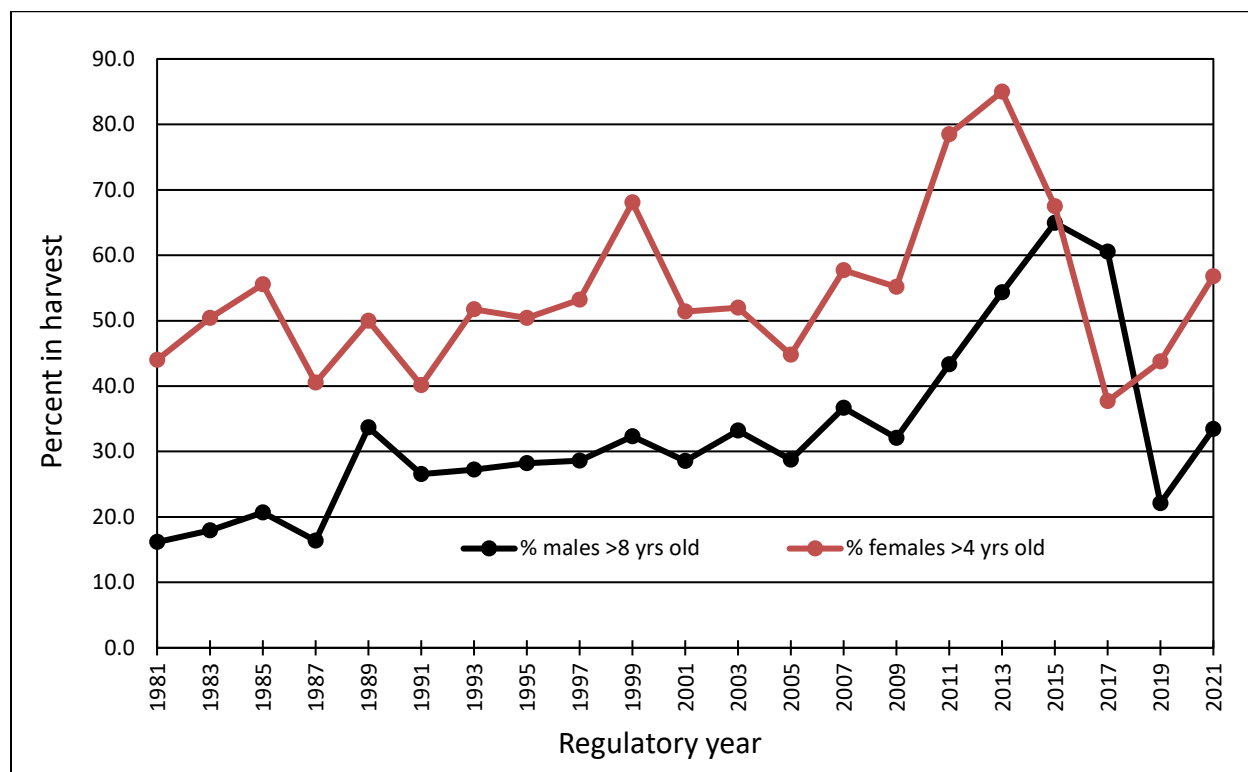


Figure 14-6. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Approximately the same amount of effort (number of hunters and days hunted) has been put forth during each open hunting season since 2017. There are no conservation issues with brown bears in Units 9D or 9E. The existing regulations were intended to decrease harvest; however, there has been no decrease in harvest since they were implemented. Adoption of this proposal will not impact the existing subsistence registration hunt or the near-village hunt.

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

PROPOSALS 15 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Lengthen the nonresident, spring brown bear hunting season in Units 9D and 9E.

PROPOSED BY: Jordan Wallace & Dave Leonard

WHAT WOULD THE PROPOSAL DO? The proposal would change the biennial spring nonresident brown bear hunting season dates in Units 9D and 9E from May 10–May 25 to May 10–May 31.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368, RB369, and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring since 1976.

Units 9D and 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9, open year-round with a bag limit of 1 bear per regulatory year.

There is a negative customary and traditional use (C&T) finding for brown bear in Unit 9D but there is a positive C&T finding for Unit 9E with an amount reasonably necessary for subsistence of 10–15 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunter opportunity, and potentially an increase in the brown bear harvest. There are currently no conservation concerns with the brown bear population in Units 9D and 9E and no expected user group conflicts. Lengthening the season to what they had been previously addresses a concern for hunter crowding during the hunting season and allows hunters to hunt during potentially better weather the end of May.

BACKGROUND: Units 9D and 9E have approximately 15,330 mi² of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi²) (Figure 15-1). Izembek National Wildlife Refuge, Alaska Peninsula, and Becharof National Wildlife Refuges are also included in Units 9D and 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Since then, participation has fluctuated, with a spike after the Covid-19 pandemic (Figure 15-2), but an overall downward trend. Percent success has stayed stable around 60%. The majority of harvest comes from guided nonresidents.

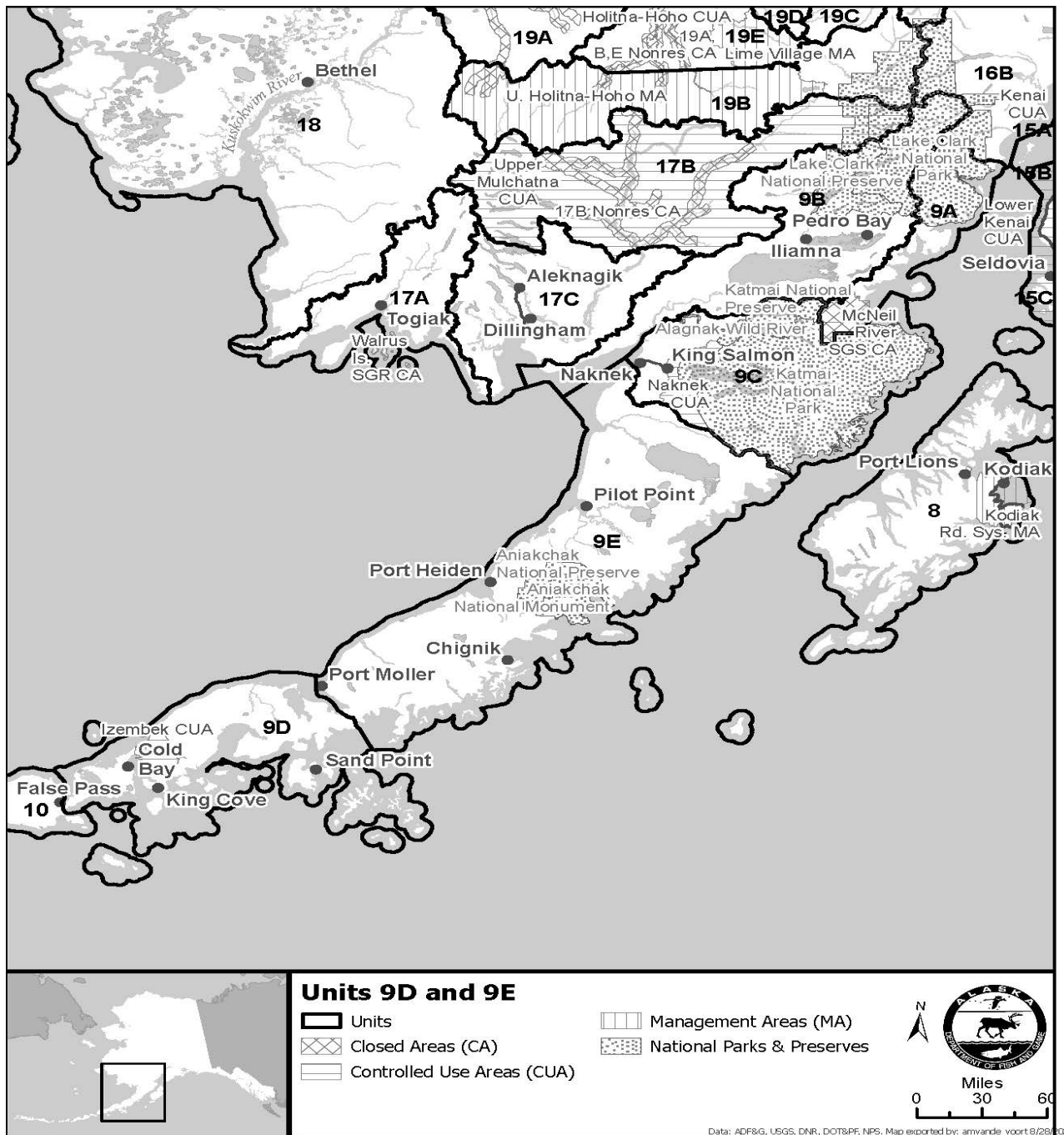


Figure 15-1. Game Management Units 9D and 9E on the Alaska Peninsula.

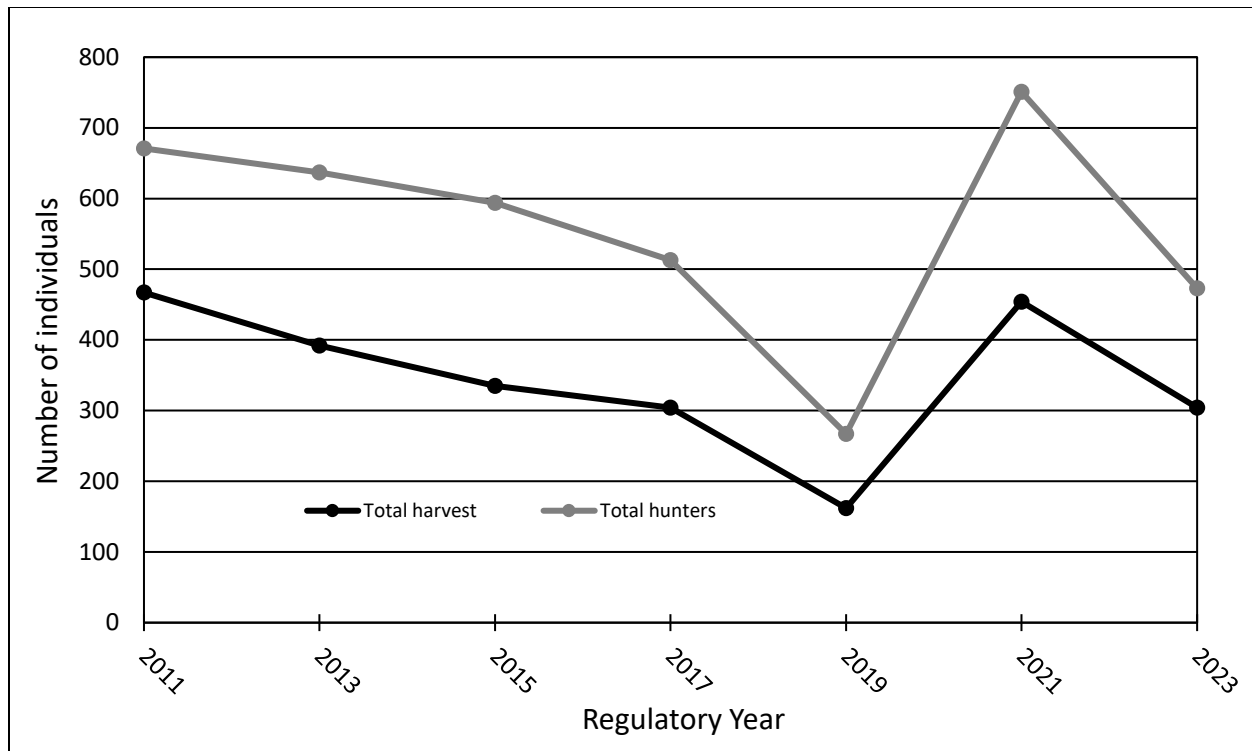


Figure 15-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

Season dates for brown bear in Units 9D and 9E were shortened to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Resident season dates were lengthened to May 10–May 31 beginning regulatory year 2021. Season dates were shortened due to concerns about sudden increases in percent male bears over 8-years old and percent adult females in the harvest. A decrease in harvest was not seen when the seasons were shortened. Instead, harvest during the first week of October was added to the second week’s harvest (Figure 15-3). Harvest during the third week of the fall season showed an increase to 22% during 2023 but was otherwise between 10–20%. Harvest chronology during the spring season is more variable and no real trends can be seen during regulatory years 2013–2017 when the season was lengthened (Figure 15-4). Resident harvest during May 26–31 was negligible during the 2023 spring season.

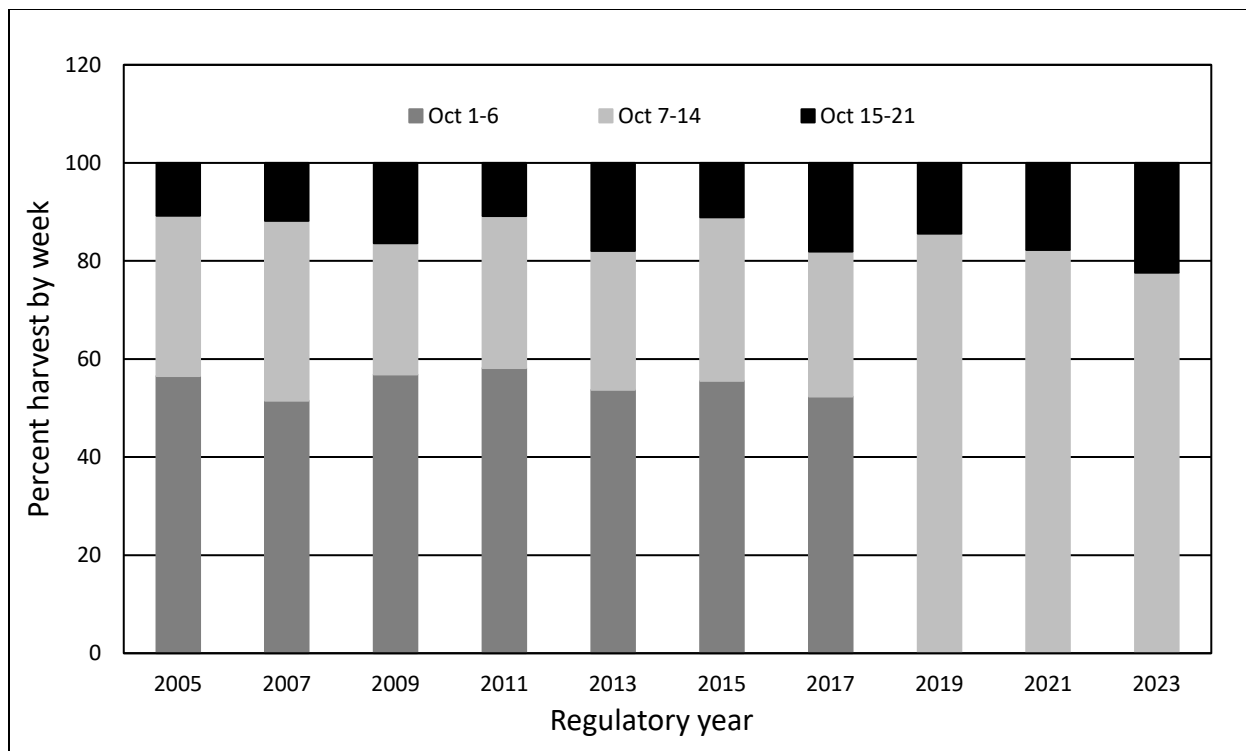


Figure 15-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

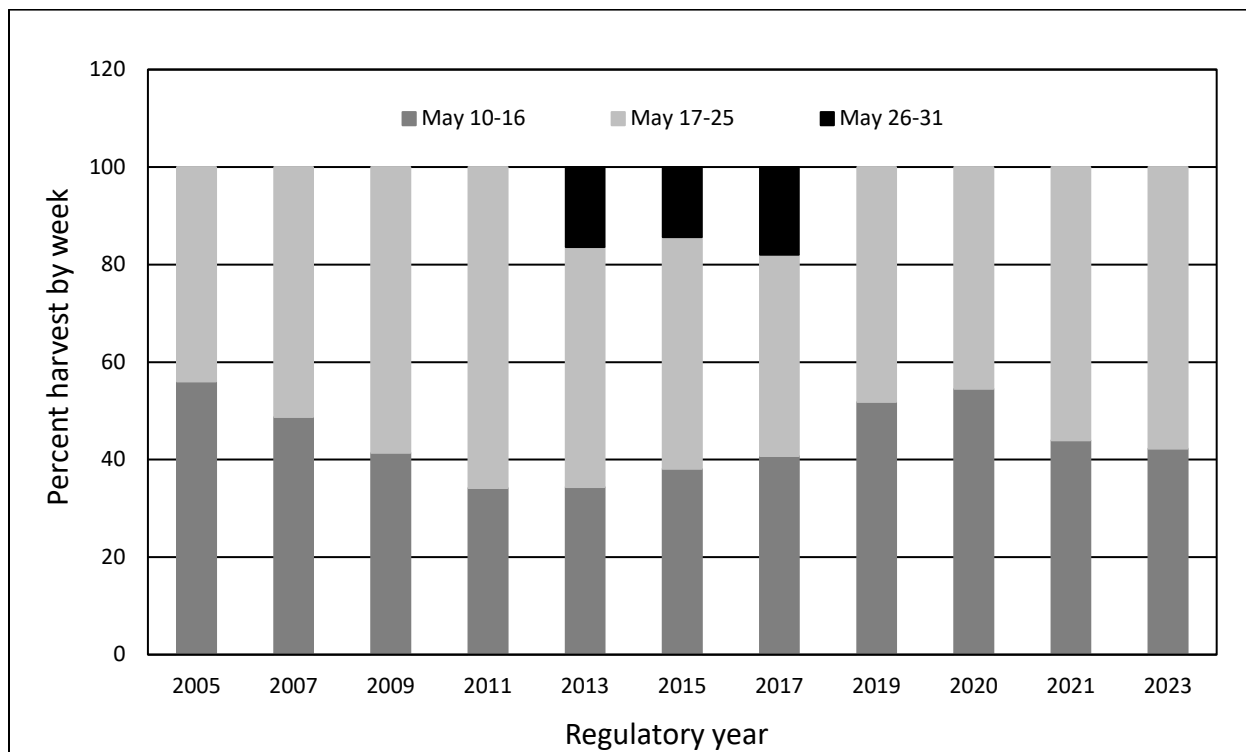


Figure 15-4. Spring harvest chronology for Units 9D and 9E, RY2005–2023.

Skull measurements and ages are obtained from harvested brown bears to track bear harvest in absence of density or population estimates. Average skull size of harvested brown bears has been stable since 2000 (Figure 15-5). Average age of harvested males reached an all-time high in 2015 and females reached an all-time high in 2013 (Figure 15-6). Age data is not available for 2023 yet. Male age dropped during 2019 when the Covid-19 pandemic caused travel restrictions and harvested bear numbers dropped but increased again in 2021. Average male skull size showed only a slight increase when average male ages were at all-time highs. Current management objectives include sustaining a harvest composed of 60% males with a total of 50 males 8-years old or older taken during the combined fall and spring seasons in Unit 9.

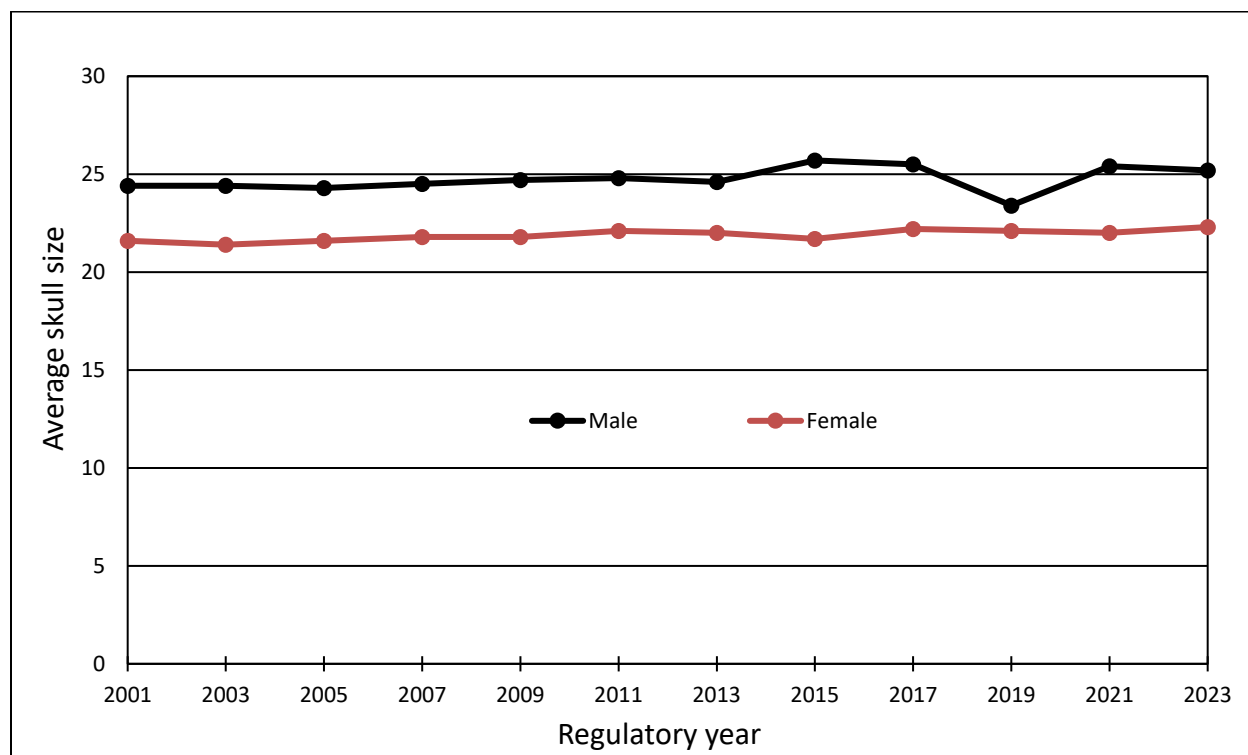


Figure 15-5. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

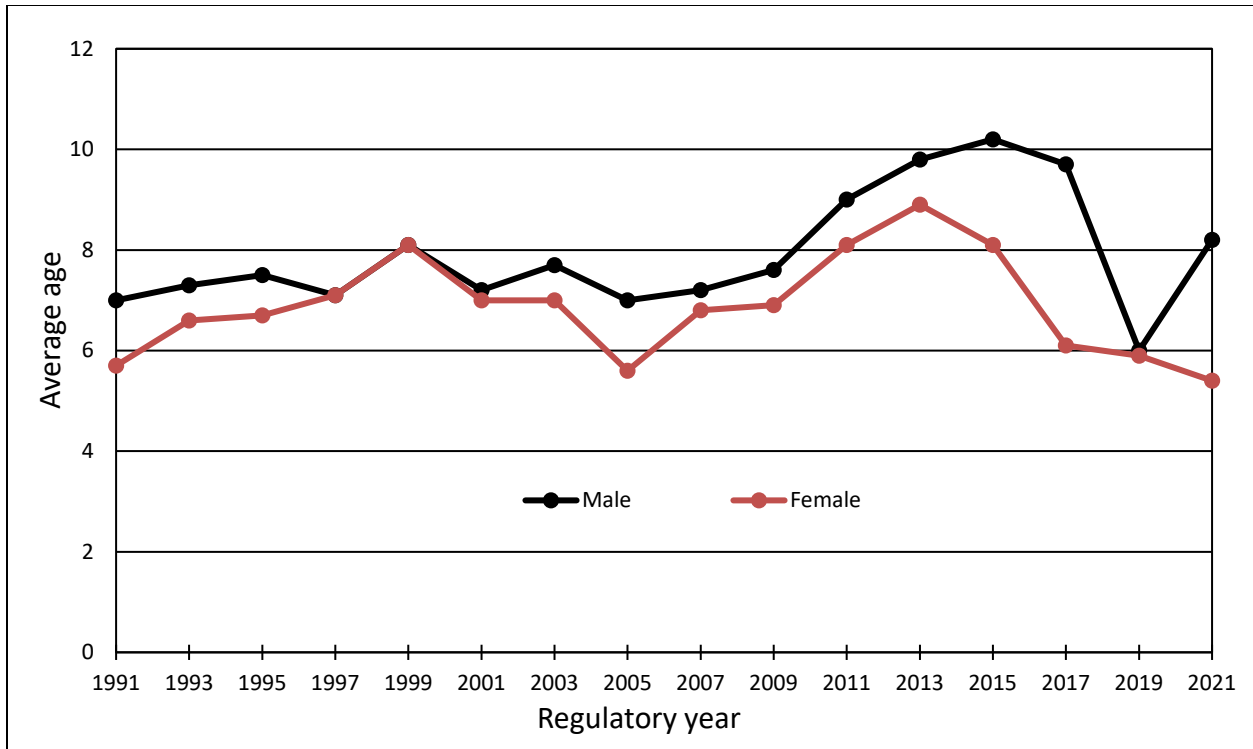


Figure 15-6. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

Percentage of male brown bears in the harvest has been at or above 60% since 1980 and 9E alone typically has more than 50 males 8-years old or older taken each season. Percentage of males older than 8-years old in the harvest dropped below 34% in 2019 and 2021 and adult females in the harvest decreased (Figure 15-7). The drop in age of harvested bears may indicate a new cohort of younger aged bears entering the population.

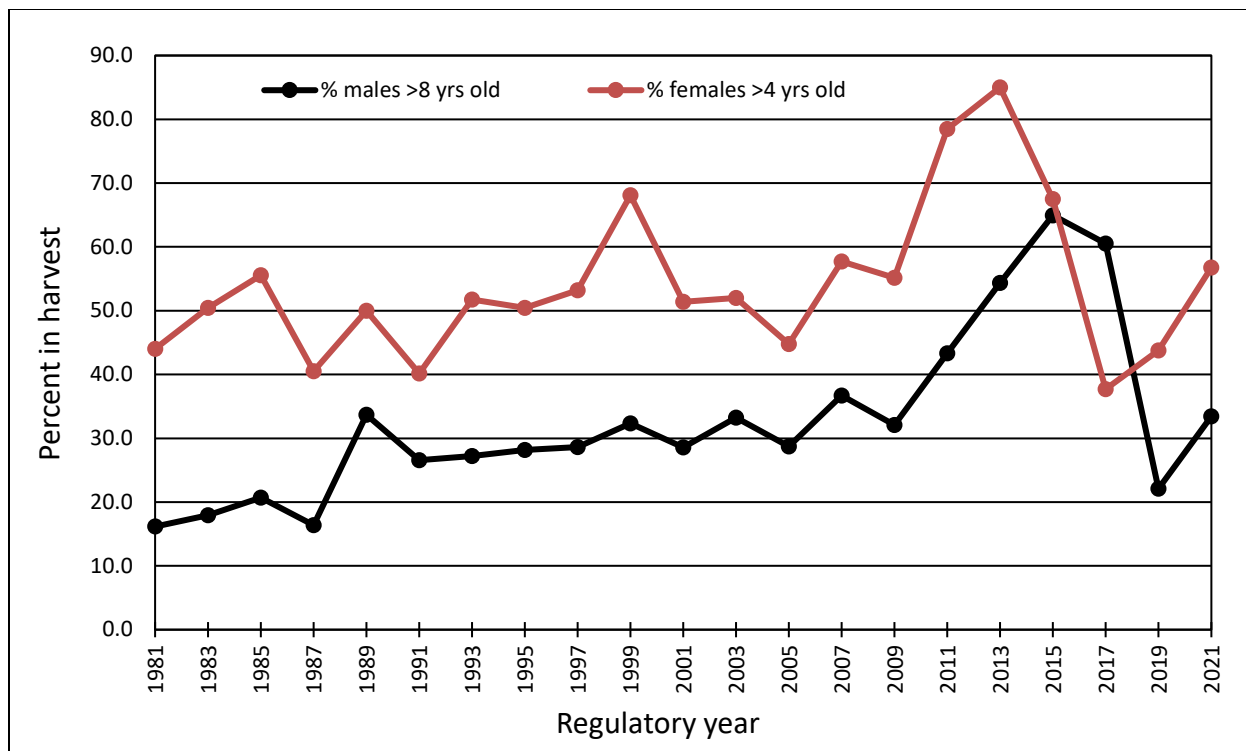


Figure 15-7. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it is primarily allocative. Approximately the same amount of effort (number of hunters and days hunted) has been put forth during each open hunting season since 2017. There are no conservation issues with brown bears in Units 9D or 9E. The existing regulations were intended to decrease harvest; however, there has been no decrease in harvest since they were implemented. Adoption of this proposal will not impact the existing subsistence registration hunt or the near-village hunt.

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

PROPOSAL 16 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents.

PROPOSED BY: Spencer Pape

WHAT WOULD THE PROPOSAL DO? The proposal would change the biennial fall brown bear hunting season dates in Units 9D and 9E from October 7–October 21 to October 1–October 21 for residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368, RB369, and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring since 1976.

Units 9D and 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9, open year-round with a bag limit of 1 bear per regulatory year.

There is a negative customary and traditional use (C&T) finding for brown bear in Unit 9D but there is a positive C&T finding for Unit 9E with an amount reasonably necessary for subsistence of 10–15 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunter opportunity, and potentially an increase in the brown bear harvest. There are currently no conservation concerns with the brown bear population in Units 9D and 9E and no expected user group conflicts. Lengthening the season to what it had been previously addresses a concern for hunter crowding during the hunting season, and allows hunters to hunt during potentially better weather the first week of October.

BACKGROUND: Units 9D and 9E have approximately 15,330 mi² of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi²) (Figure 16-1). Izembek National Wildlife Refuge, Alaska Peninsula, and Becharof National Wildlife Refuges are also included in Units 9D and 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Since then, participation has fluctuated, with a spike after the Covid-19 pandemic (Figure 16-2), but an overall downward trend. Percent success has stayed stable around 60%. The majority of harvest comes from guided nonresidents.

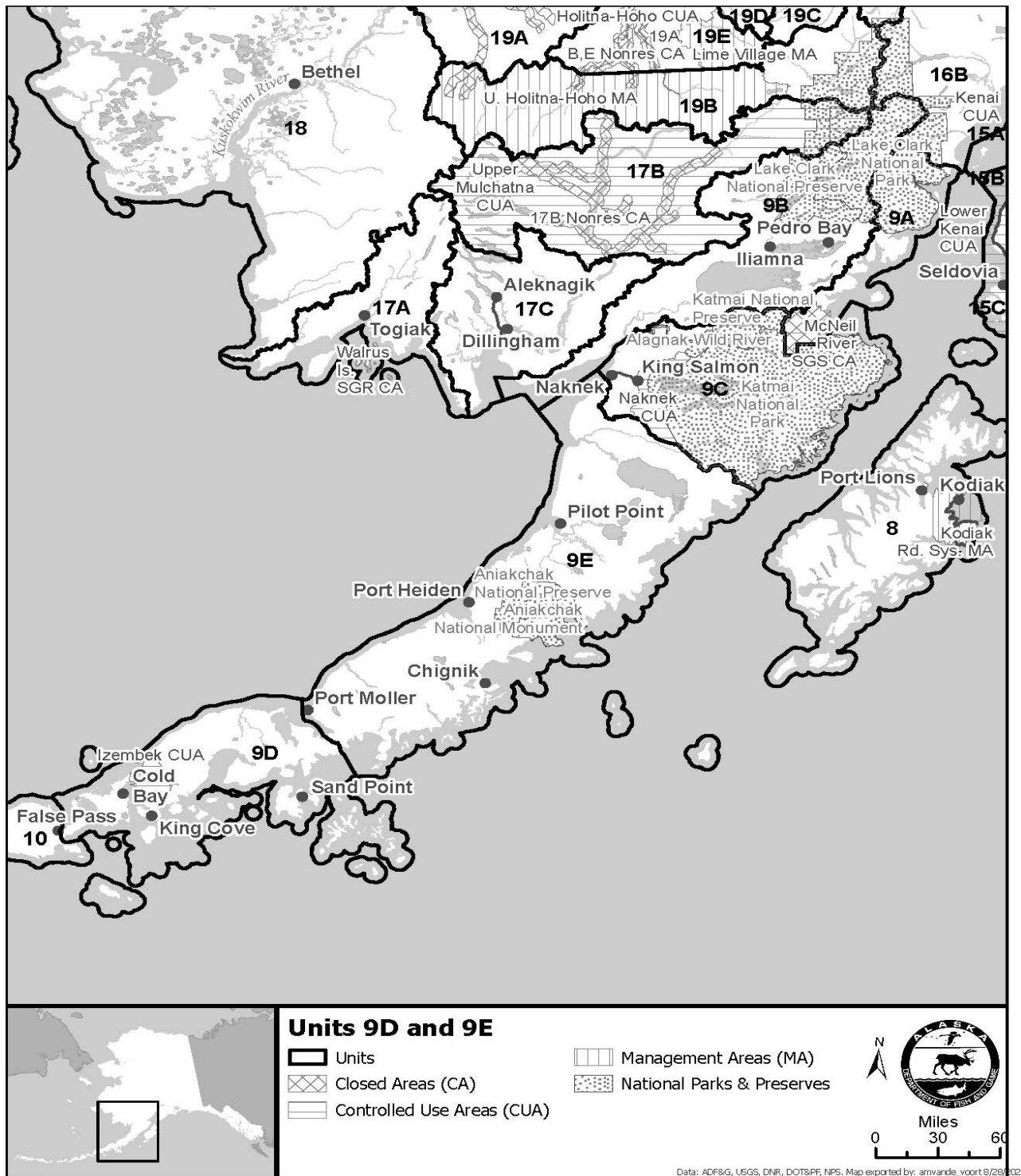


Figure 16-1. Game Management Units 9D and 9E on the Alaska Peninsula.

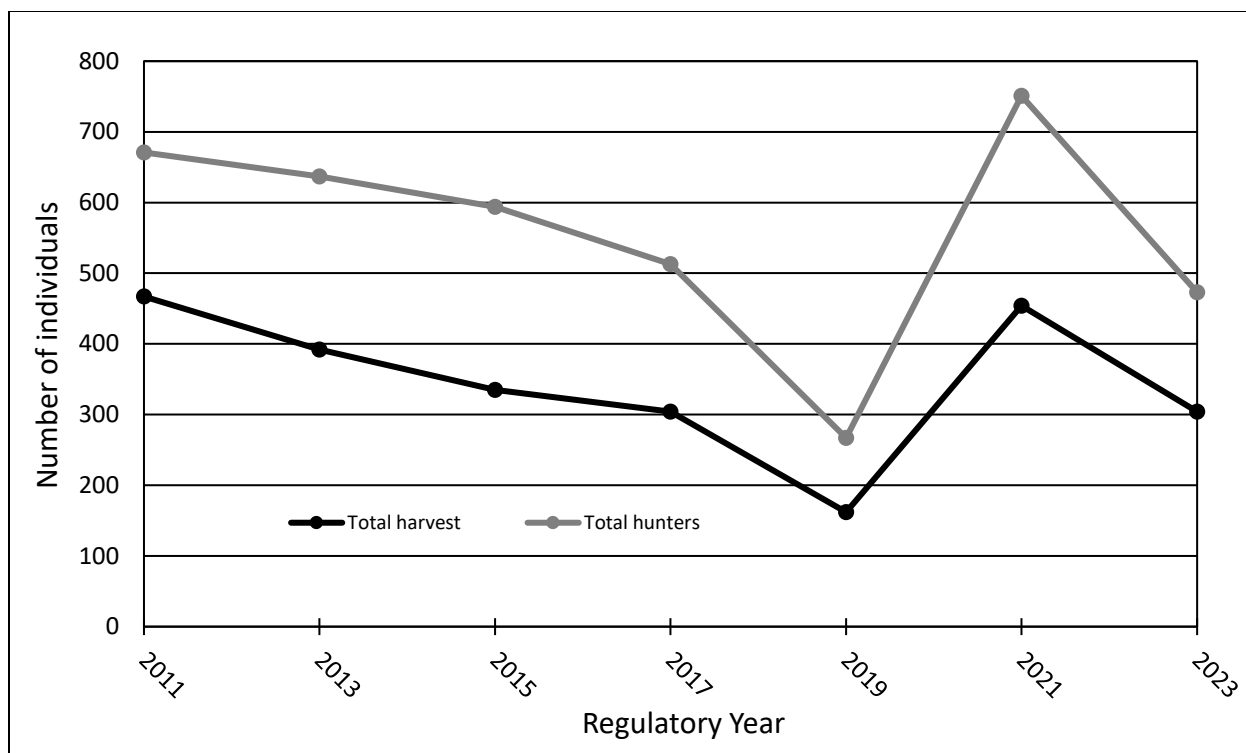


Figure 16-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

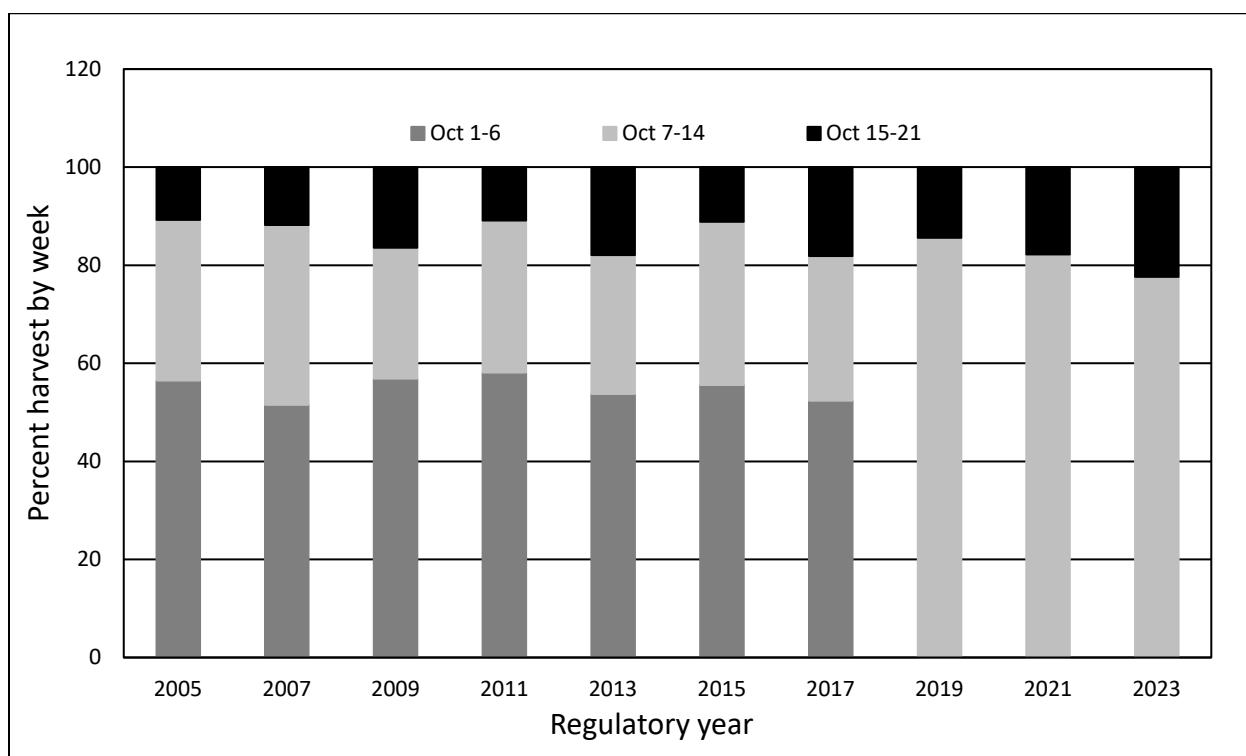


Figure 16-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

Season dates for brown bear in Units 9D and 9E were shortened to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Resident season dates were lengthened to May 10–May 31 beginning regulatory year 2021. Season dates were shortened due to concerns about sudden increases in percent male bears over 8-years old and percent adult females in the harvest. A decrease in harvest was not seen when the seasons were shortened. Instead, harvest during the first week of October was added to the second week’s harvest (Figure 16-3). Harvest during the third week of the fall season showed an increase to 22% during 2023 but was otherwise between 10–20%.

Skull measurements and ages are obtained from harvested brown bears to track bear harvest in absence of density or population estimates. Average skull size of harvested brown bears has been stable since 2000 (Figure 16-4). Average age of harvested males reached an all-time high in 2015 and females reached an all-time high in 2013 (Figure 16-5). Age data is not available for 2023 yet. Male age dropped during 2019 when the Covid-19 pandemic caused travel restrictions and harvested bear numbers dropped but increased again in 2021. Average male skull size showed only a slight increase when average male ages were at all-time highs. Current management objectives include sustaining a harvest composed of 60% males with a total of 50 males 8-years old or older taken during the combined fall and spring seasons in Unit 9.

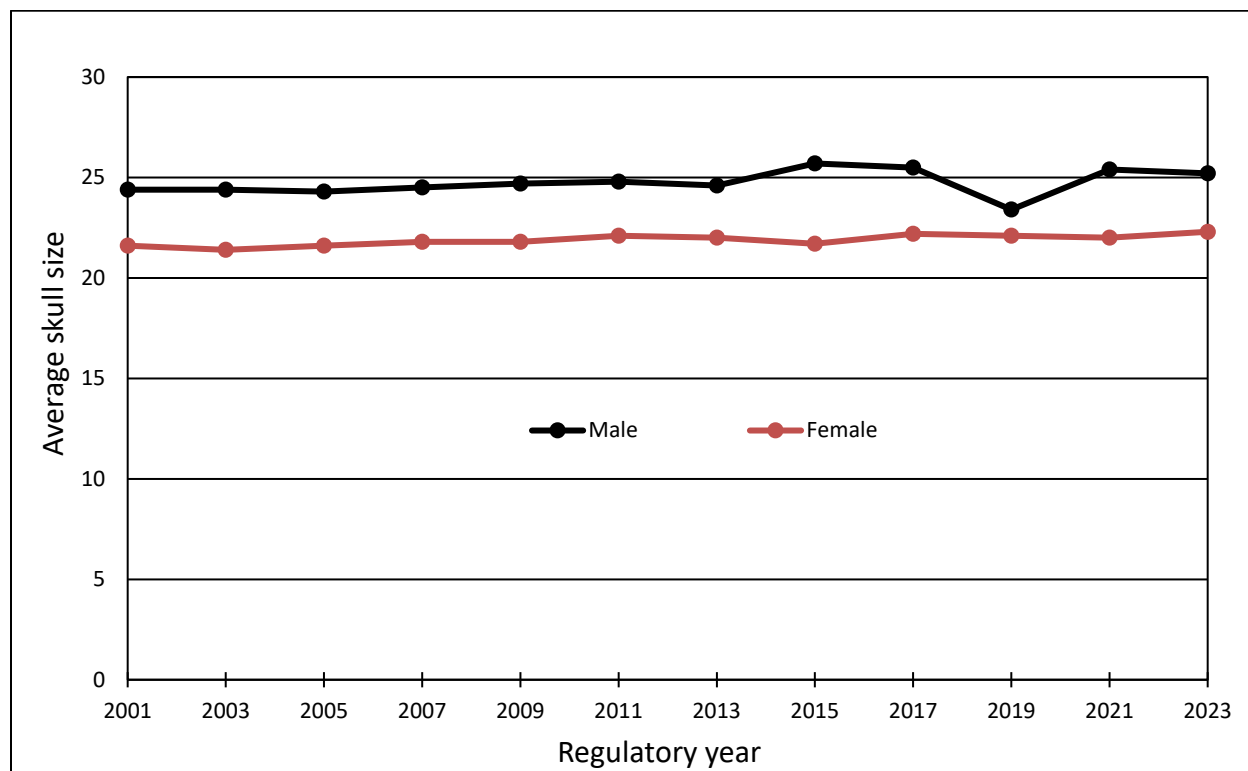


Figure 16-4. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

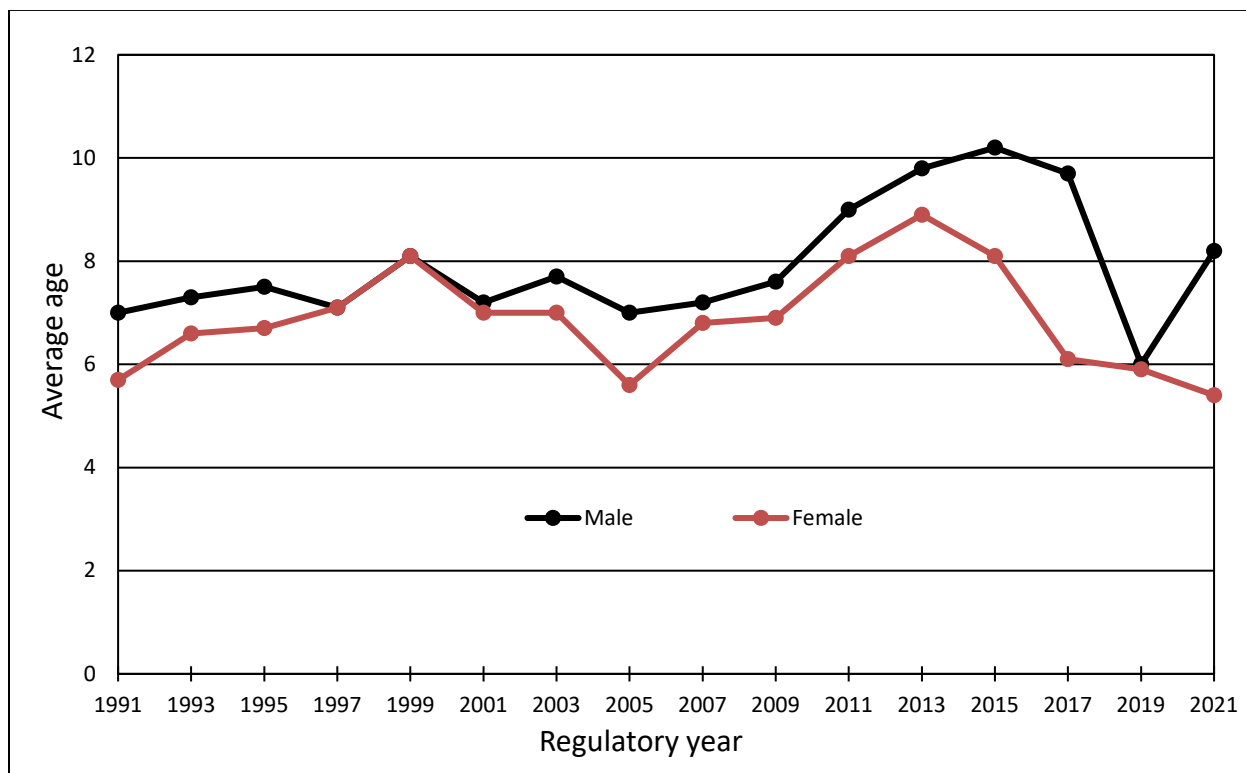


Figure 16-5. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

Percentage of male brown bears in the harvest has been at or above 60% since 1980 and 9E alone typically has more than 50 males 8-years old or older taken each season. Percentage of males older than 8-years old in the harvest dropped below 34% in 2019 and 2021 and adult females in the harvest decreased (Figure 16-6). The drop in age of harvested bears may indicate a new cohort of younger aged bears entering the population.

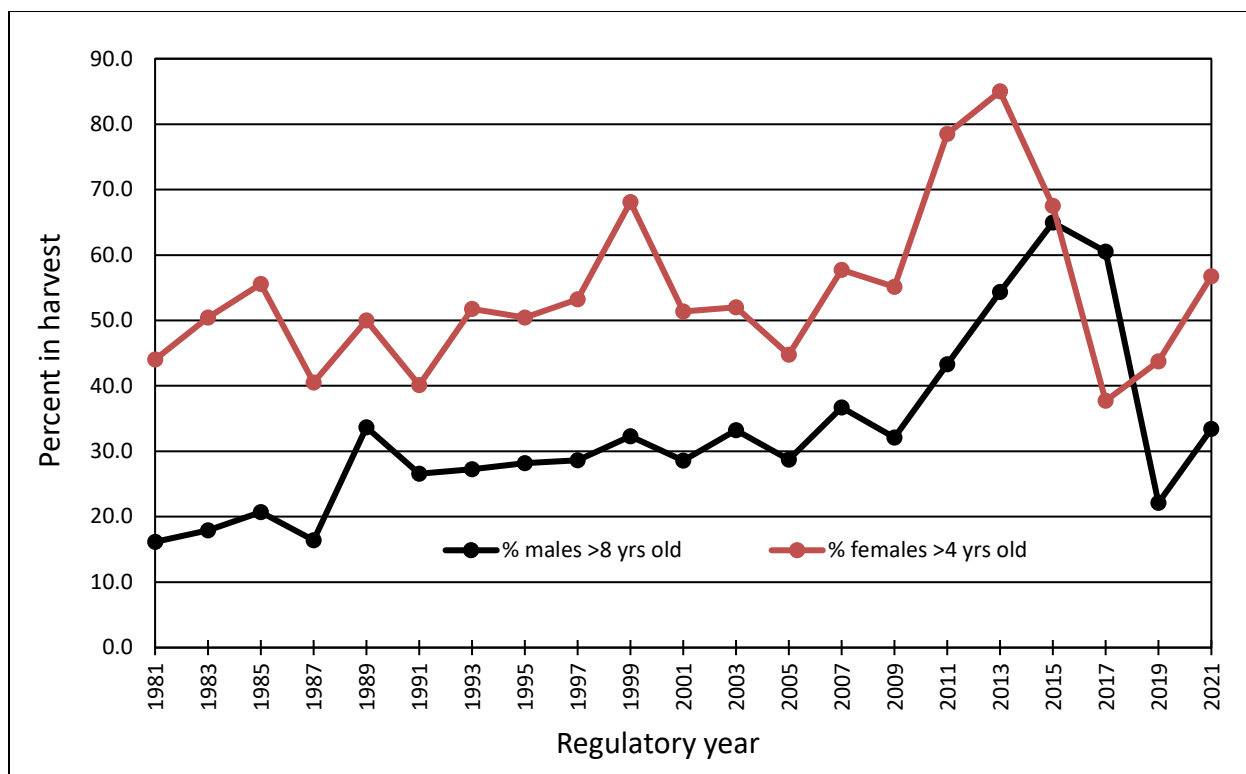


Figure 16-6. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Approximately the same amount of effort (number of hunters and days hunted) has been put forth during each open hunting season since 2017. There are no conservation issues with brown bears in Units 9D or 9E. The existing regulations were intended to decrease harvest, however, there has been no decrease in harvest since they were implemented. Adoption of this proposal will not impact the existing subsistence registration hunt or the near-village hunt.

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

PROPOSAL 17 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Lengthen the brown bear spring and fall hunting season dates in Unit 9E for residents and nonresidents.

PROPOSED BY: Tracy Vrem

WHAT WOULD THE PROPOSAL DO? This proposal would change the biennial fall brown bear hunting season dates in Unit 9E from October 7–October 21 for residents and nonresidents to October 1–October 21 for both residents and nonresidents. It would also change the biennial spring season for nonresidents from May 10–May 25 to May 10–May 31. Thus, it would add 6 days of

hunting opportunity during the fall for both residents and nonresidents and 6 days in the spring for nonresidents only.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Regulations are one brown bear every four regulatory years by registration permits RB368 and RB370 with biennial seasons open every other year during odd years in the fall and even years in the spring since 1976.

Unit 9E: residents and nonresidents October 7–October 21; residents May 10–May 31; nonresidents May 10–May 25

RB502, a subsistence permit for Unit 9B and the portion of Unit 9E that includes all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9D and 9E, a bag limit of one bear per regulatory year. Season dates in Unit 9B are September 1–May 31, and season dates in that portion of 9E are November 1–December 31.

Resident hunters can also hunt with an RB525 permit within 5 miles of each community in Unit 9, open year-round with a bag limit of 1 bear per regulatory year.

There is a positive customary and traditional use (C&T) finding for brown bear in Unit 9E with an amount reasonably necessary for subsistence of 10–15 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted there will be an increase in hunter opportunity, and potentially an increase in the brown bear harvest. There are currently no conservation concerns with the brown bear population in Unit 9E and no expected user group conflicts. Lengthening the seasons to what they had been previously addresses a social concern of hunter crowding during the hunting season and allows hunters to hunt during potentially better weather the first week of October and the end of May.

BACKGROUND: Unit 9E has approximately 11,271 mi² of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi²) (Figure 17-1). Alaska Peninsula and Becharof National Wildlife Refuges are also included in Unit 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Since then, participation has fluctuated, with a spike after the Covid-19 pandemic (Figure 17-2), but an overall downward trend. Percent success has stayed stable around 60%. The majority of harvest comes from guided nonresidents.

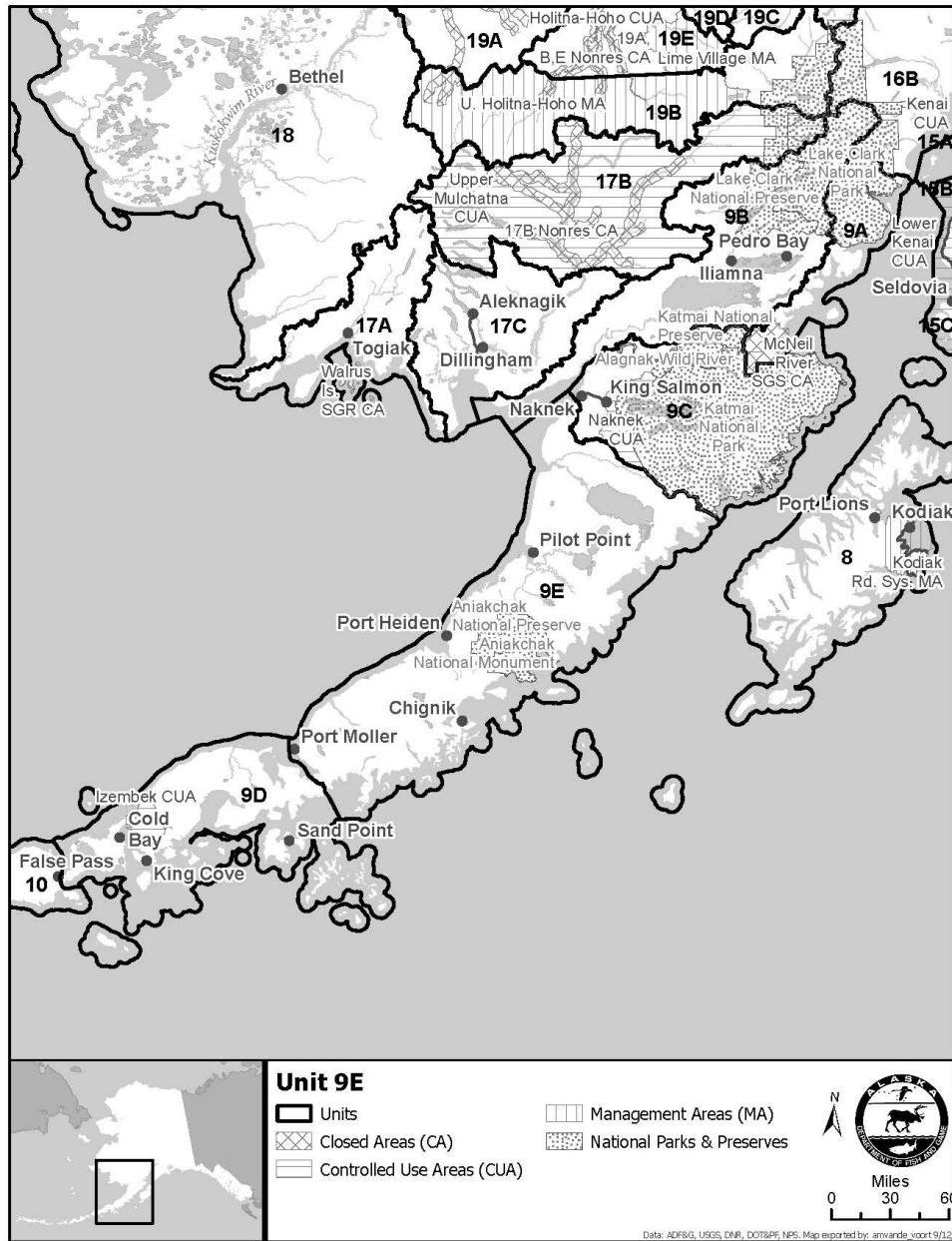


Figure 17-1. Game Management Unit 9E on the Alaska Peninsula.

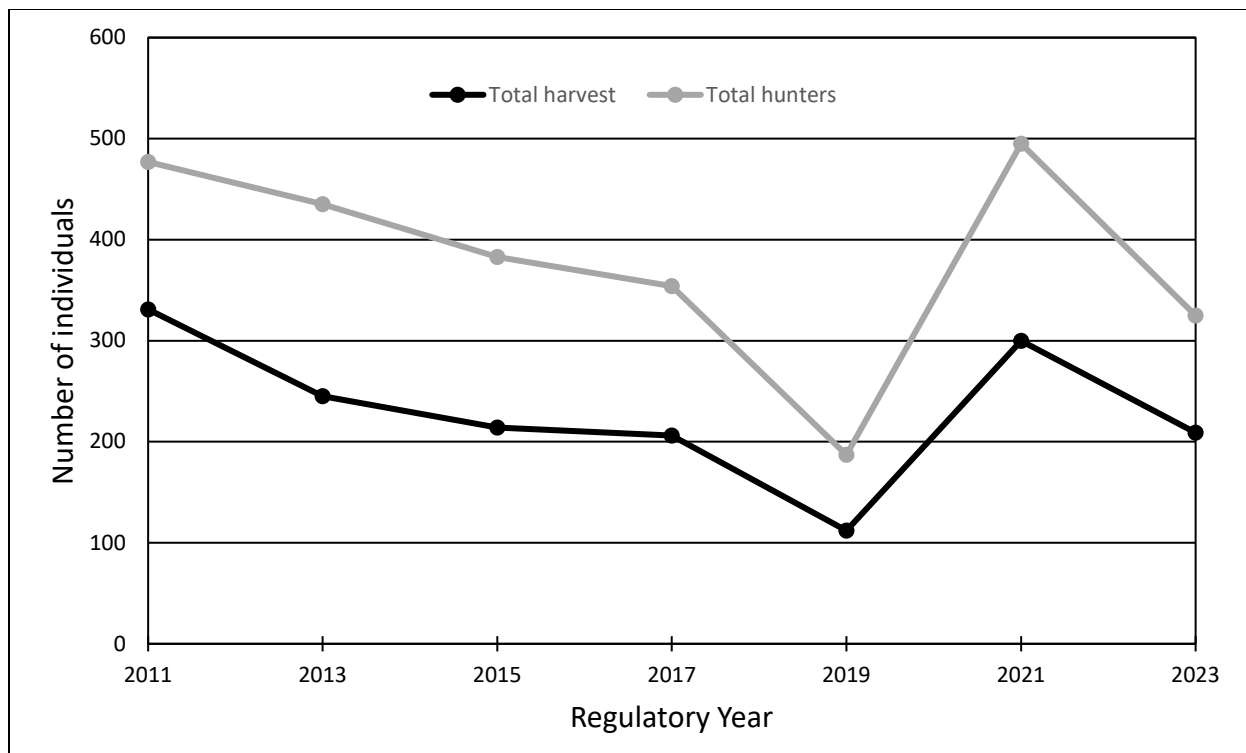


Figure 17-2. Total hunter participation and total brown bear harvest for Unit 9E, RY2011–2023.

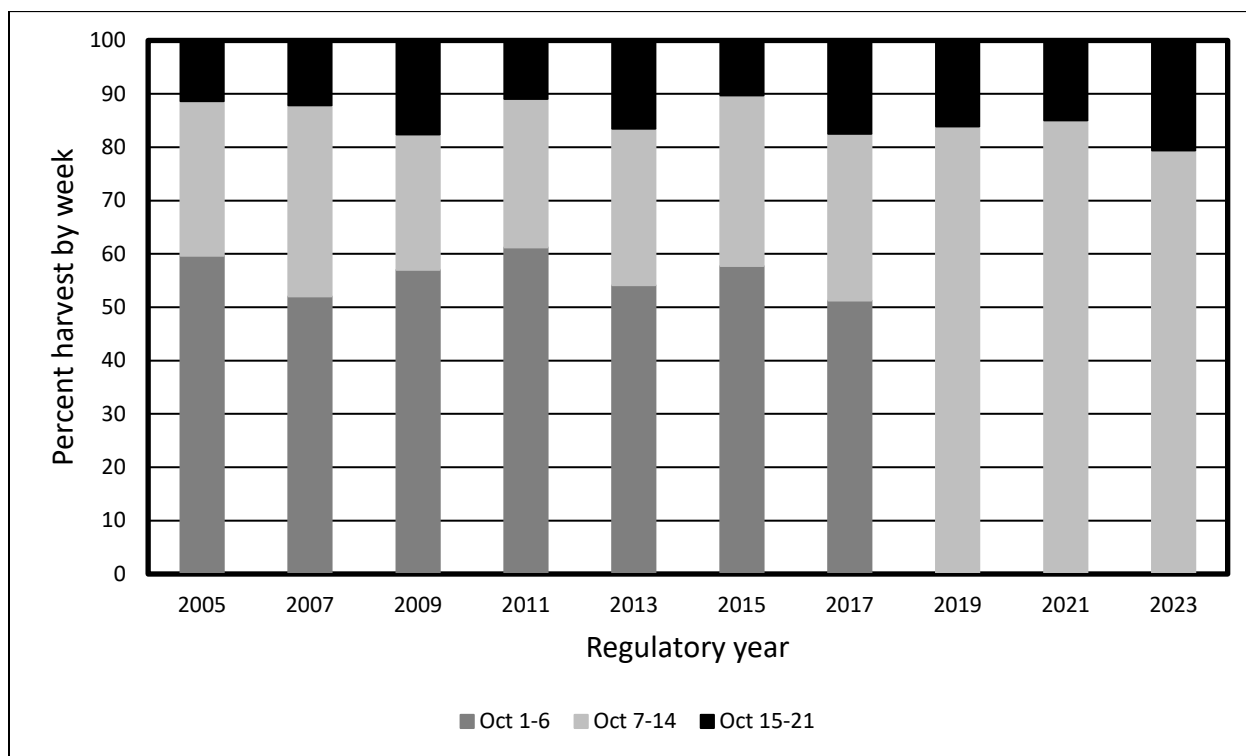


Figure 17-3. Fall harvest chronology for Unit 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

Season dates for brown bear in Unit 9E were shortened to October 7–October 21 and May 10–May 25 beginning in regulatory year 2019. Resident season dates were lengthened to May 10–May 31 beginning regulatory year 2021. Season dates were shortened due to concerns about sudden increases in percent male bears over 8-years old and percent adult females in the harvest. A decrease in harvest was not seen when the seasons were shortened. Instead, harvest during the first week of October was added to the second week’s harvest (Figure 17-3). Harvest during the third week of the fall season showed an increase to 21% during 2023 but was otherwise between 10–18%. Harvest chronology during the spring season is more variable and no real trends can be seen during regulatory years 2013–2017 when the season was lengthened (Figure 17-4). Resident harvest during May 26–31 was negligible during the 2023 spring season.

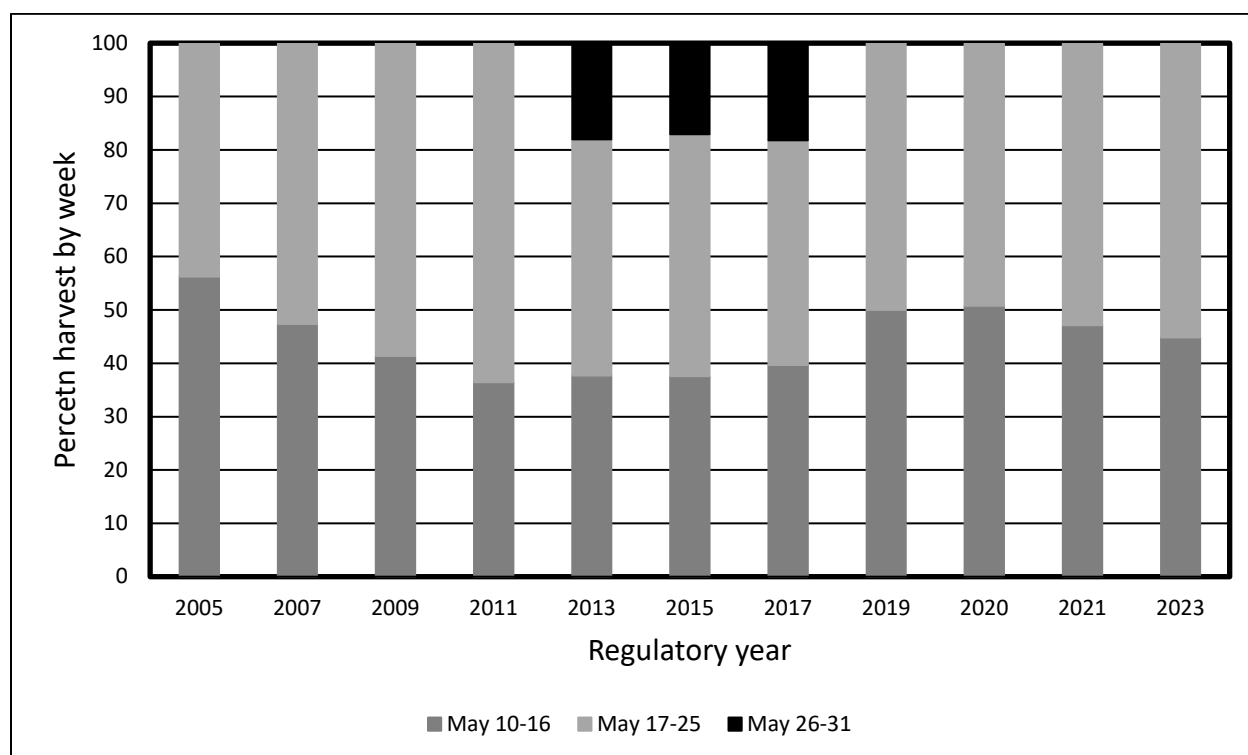


Figure 17-4. Spring harvest chronology for Unit 9E, RY2005–2023.

Skull measurements and ages are obtained from harvested brown bears to track bear harvest in absence of density or population estimates. Average skull size of harvested brown bears has been stable since 2001 (Figure 17-5). Average age of harvested males and females reached all-time highs in 2013 (Figure 17-6). Age data is not available for 2023 yet. Male age dropped during 2019 when the Covid-19 pandemic caused travel restrictions and resulted in a low bear harvest; harvest increased in 2021. Average male skull size showed only a slight increase when average male ages were at all-time highs. Current management objectives include sustaining a harvest composed of 60% males with a total of 50 males 8-years old or older taken during the combined fall and spring seasons in Unit 9.

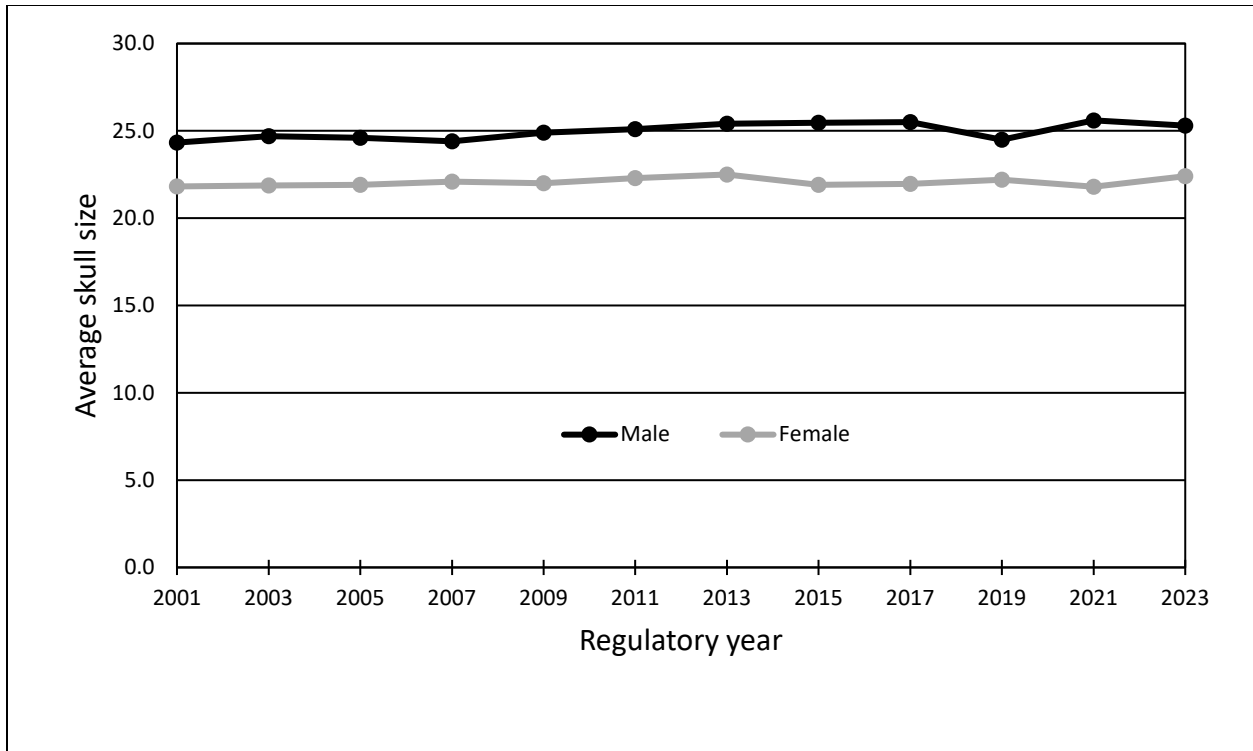


Figure 17-5. Average skull size of harvested male and female brown bears in Unit 9E, RY2001–2023.

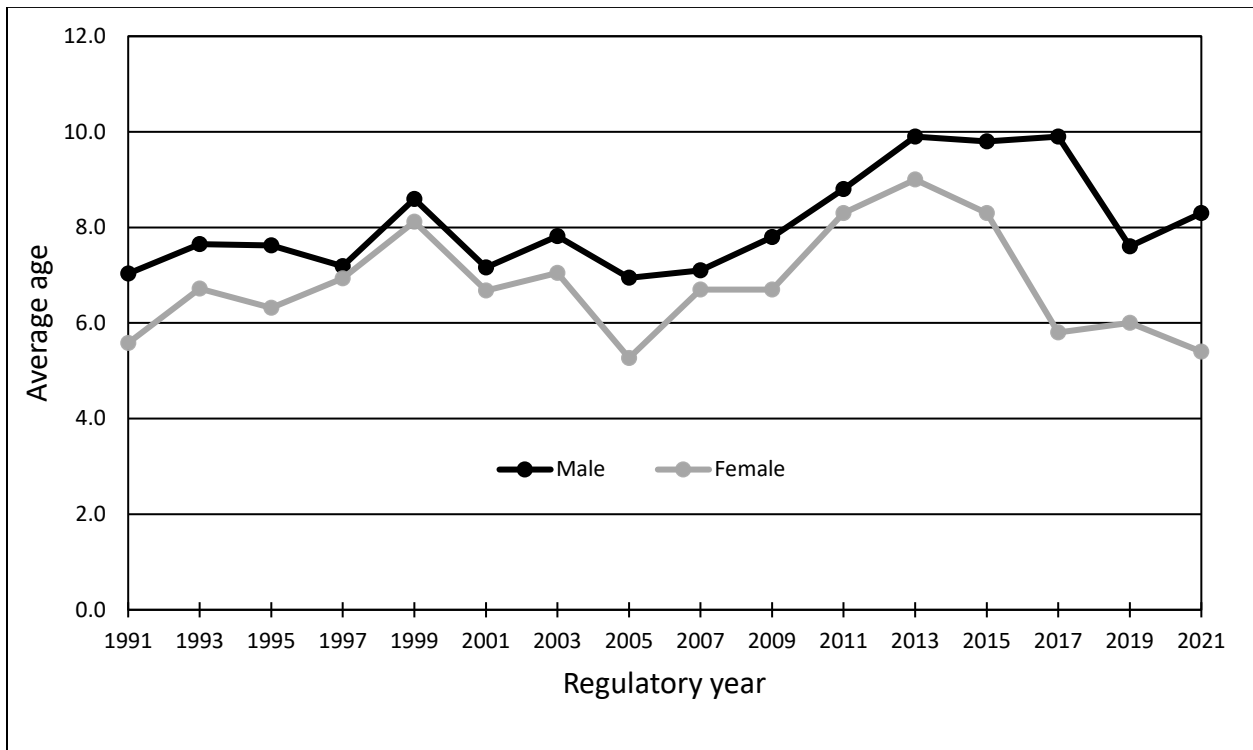


Figure 17-6. Average age of harvested male and female brown bears in Unit 9E, RY 1991–2021.

Percentage of male brown bears in the harvest has been at or above 60% since 1989 and 9E alone typically has more than 50 males 8-years old or older taken each season. Percentage of males older than 8-years old in the harvest dropped to 34% in 2021 and adult females in the harvest decreased (Figure 17-7). The drop in age of harvested bears may indicate a new cohort of younger aged bears entering the population.

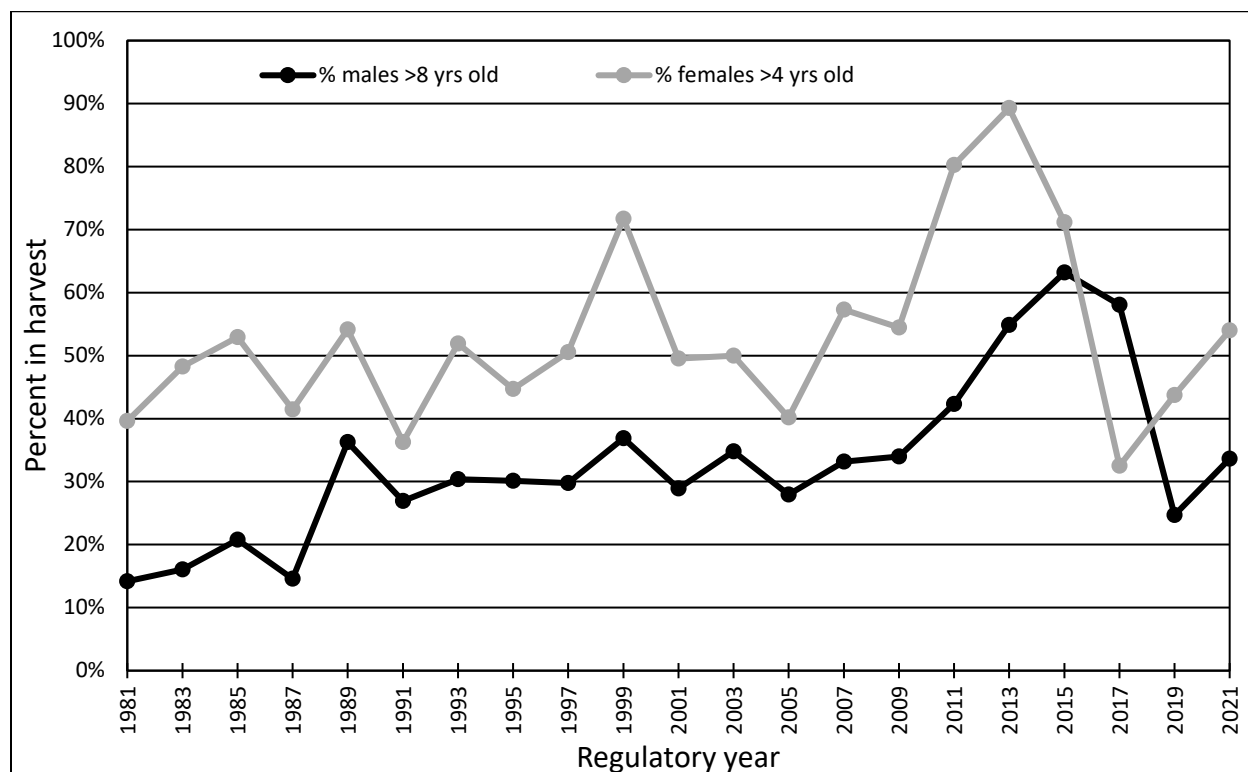


Figure 17-7. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest in Unit 9E, regulatory years 1981 through 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. This proposal would provide equal opportunity to residents and nonresidents. Approximately the same amount of effort (number of hunters and days hunted) has been put forth during each open hunting season since 2017. There are no conservation issues with brown bears in Unit 9E. The existing regulations were intended to decrease harvest, however, there has been no decrease in harvest since they were implemented. Adoption of this proposal will not impact the existing subsistence registration hunt or the near-village hunt.

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

PROPOSAL 18 - 5 AAC 85.020, Seasons and bag limits for brown bears. Shorten the brown bear season in Unit 9C and create a draw permit for the portion in Katmai National Preserve.

PROPOSED BY: David Bachrach

WHAT WOULD THE PROPOSAL DO? Shortens the brown bear season dates in Unit 9C by 12 days from October 1–October 21 and May 10–May 31 to October 7–October 21 and May 10–May 25 for residents and nonresidents and establishes a drawing permit for the portion of Unit 9C in Katmai Preserve.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations for Unit 9 can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*. Registration permits available for Unit 9C include RB368 for the fall hunt, RB370 for the spring hunt, and RB525 open to residents year-round for near villages.

Regulations are one brown bear every four regulatory years by registration permit, October 1–21 and May 10–31 for residents and nonresidents. Biennial seasons are open every other year during odd years in the fall and even years in the spring which have been in effect since 1976. Resident hunters can also hunt with an RB525 permit within 5 miles of each community (King Salmon, Naknek and South Naknek) in Unit 9C, open year-round with a bag limit of 1 bear per year. There is a negative customary and traditional use finding for brown bear in Unit 9C.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will decrease hunting opportunity both in duration of seasons and in requiring a drawing permit to participate. For comparison, season dates were shortened for Units 9D and 9E in regulatory year 2019 in an attempt to decrease harvest. The shortened season dates for those units mimic what this proposal is intending with shorter season dates. After shortening season dates in Units 9D and 9E, brown bear harvest became more concentrated during the first week of the fall season and there was no pattern seen for harvest during the spring season. Overall, there was no significant decrease in brown bear harvest, just a different distribution of when bears were harvested. It is anticipated that this unit would show the same trend with no overall decrease in brown bear harvest. Adding a draw permit for a portion of Unit 9C creates undue administrative burden when there are no conservation concerns for brown bear in Unit 9C. Katmai National Park provides an extensive refugia from hunting pressure.

BACKGROUND: Unit 9C has approximately 6,652 mi² of available brown bear habitat (excluding high elevation and large water bodies) of which approximately 2,635 mi² is open to bear hunting; 717 mi² of that includes Katmai National Preserve (Table 18-1, Figure 18-1). The remaining 4,017 mi² of bear habitat is located in Katmai National Park (KNP), which is closed to hunting and provides a large area of refugia. However, bears have large home ranges and move freely across administrative boundaries. Seasonal and daily movements are largely the result of available food resources.

Table 18-5. Unit 9C land and hunting closure status. Bear habitat is considered below 2,700 ft elevation with large water bodies removed.

Land area	mi ²	km ²
Unit 9C area	7,687	19,909
Katmai National Park and Preserve	6,719	17,402
All Unit 9C bear habitat area	6,652	17,230
Bear habitat closed to hunting		
Katmai National Park	4,017	10,404
Total area closed	4,017	10,404
Unit 9C bear habitat open to hunting	2,635	6,825

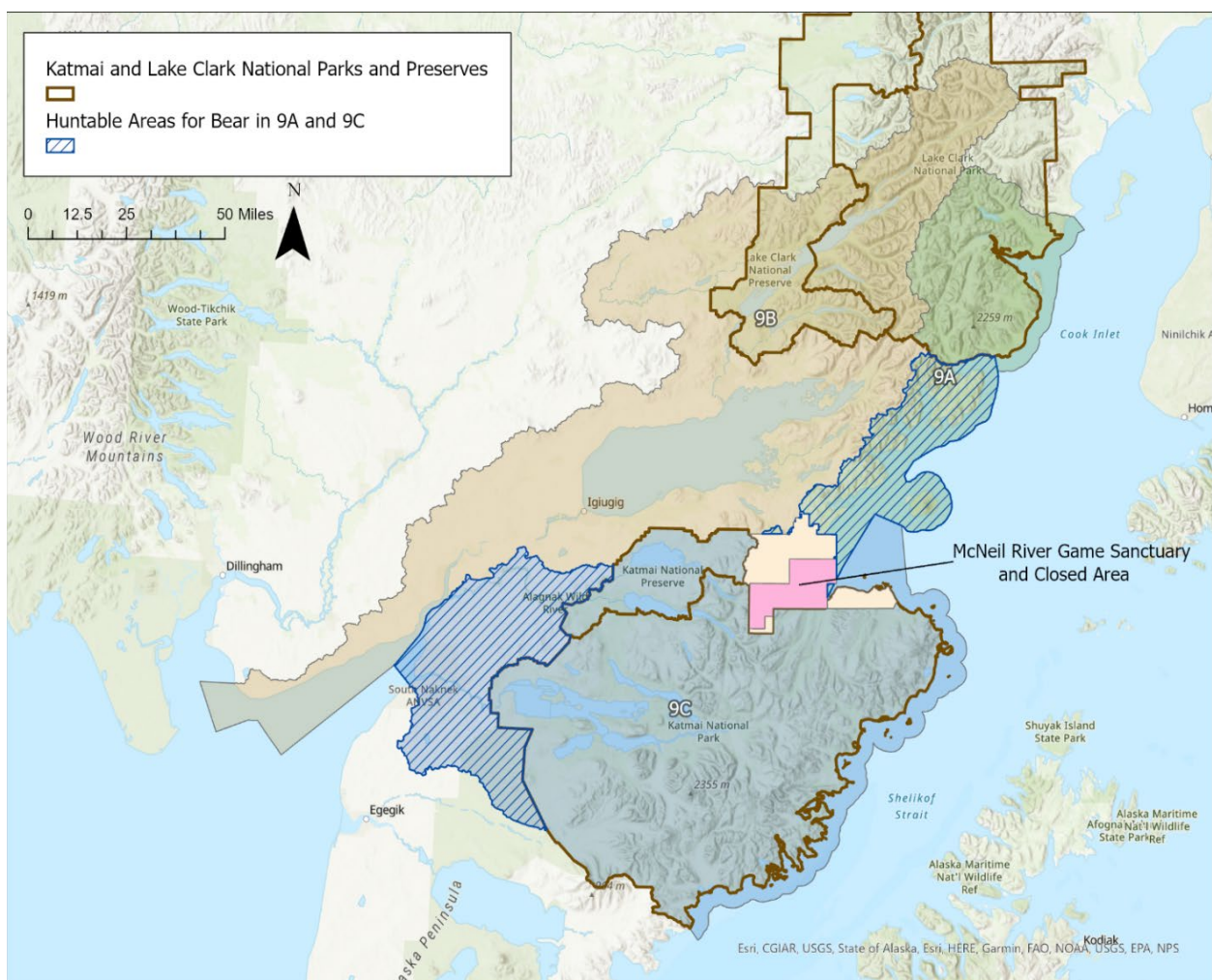


Figure 18-1. Unit 9C is composed primarily of Katmai National Park and Preserve and a western area of state and private lands. Katmai National Park is closed to hunting. Katmai National Preserve is open to hunting.

Registration permits were required beginning in 2011 to better monitor harvest and hunter participation. Average annual harvest in Unit 9C during 2013–2023 was 15.3 brown bears (Table 18-2). Based on the abundance estimate for Unit 9C from 2004–2005, 15.3 bears represents a harvest rate of less than 1% for a population ranging from 1,593 to 2,389 bears. This is a sustainable harvest rate for brown bears. Nonresident and resident hunter harvest of brown bears varies annually in Unit 9C (Table 18-2). Average ages of both male and female bears in the harvest are trending upwards since 2000 (Figure 18-2, data does not include regulatory years 2022–2023). Average skull sizes of both male and female bears are steady (Figure 18-3). Brown bear harvest reached a peak of 70 bears harvested during the 2002–2003 hunting seasons and has decreased since then (Figure 18-4). Since regulatory year 2000, only 16.6% of brown bear harvest for Unit 9C came from lands within Katmai National Preserve, which comprises 27.2% of brown bear habitat open to hunting.

Table 18-6. Unit 9C brown bear harvest and successful hunter participation by residency for biennial hunts RB368 and RB370, regulatory years 2013–2023. Total hunters include unsuccessful resident and nonresident hunters. Table does not include harvest from RB525.

Regulatory Year	Successful Residents	Successful Nonresidents	Total Successful	Total Hunters ^c
2013	12	8	20	59
2014	0	0	0	0
2015	20	23	43	75
2016	0	0	0	0
2017	6	25	31	60
2018	0	0	0	0
2019 ^a	13	5	18	41
2020 ^b	13	5	18	31
2021	6	11	17	38
2022	0	0	0	0
2023	7	14	21	44

^a Fall season only

^b Spring (2021) season only

^c Total hunters include unsuccessful resident and nonresident hunters.

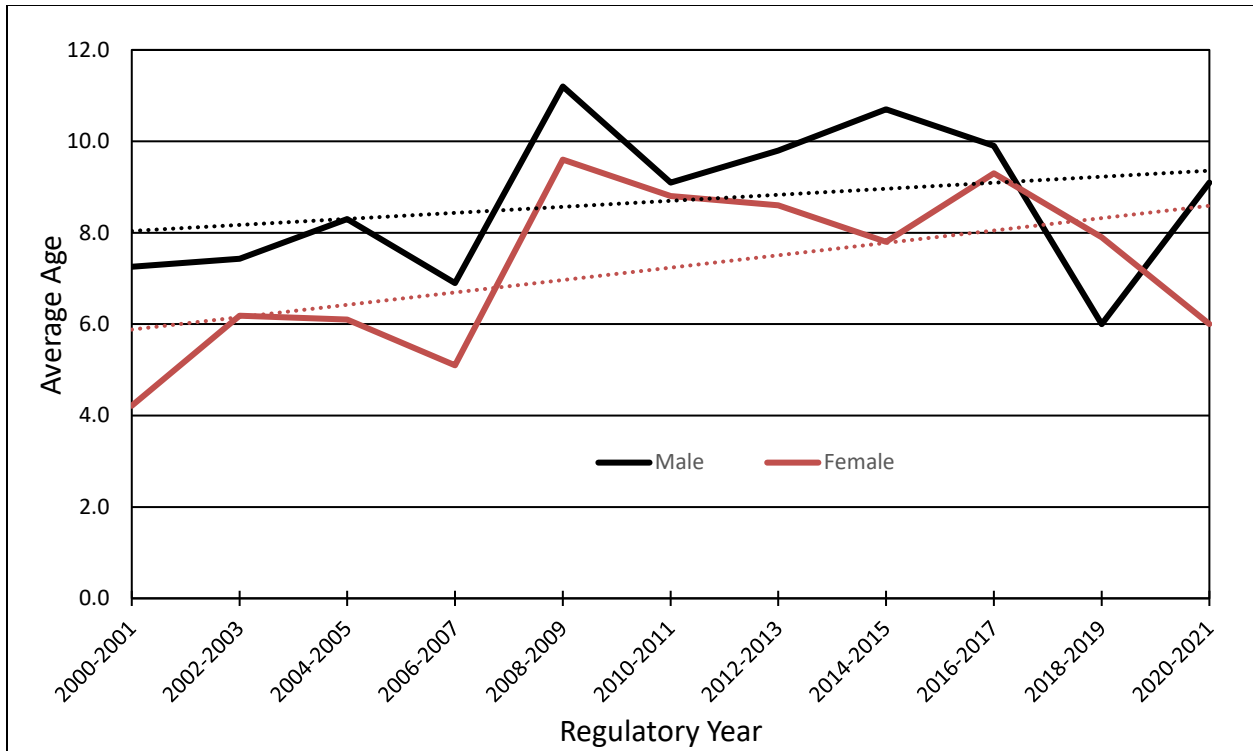


Figure 18-2. Average ages of male and female brown bears harvested in Unit 9C, regulatory years 2001–2021.

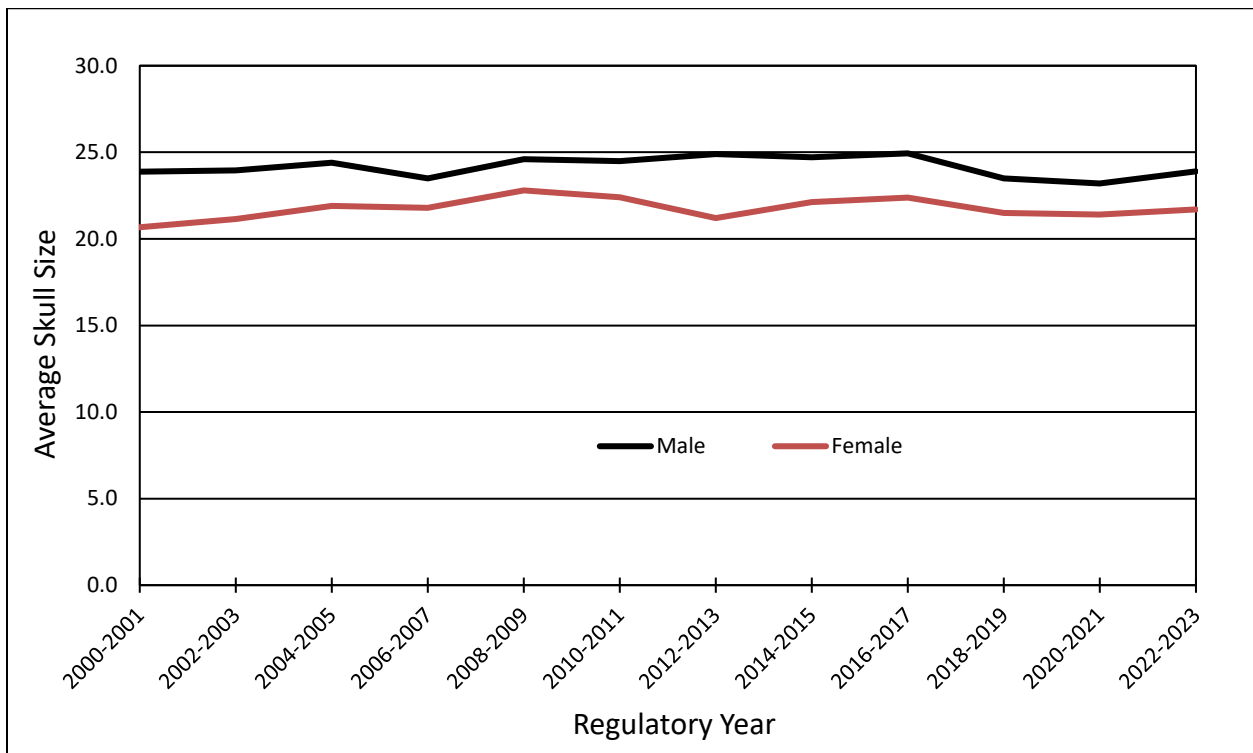


Figure 18-3. Average skull sizes of male and female brown bears harvested in Unit 9C, regulatory years 2001–2023.

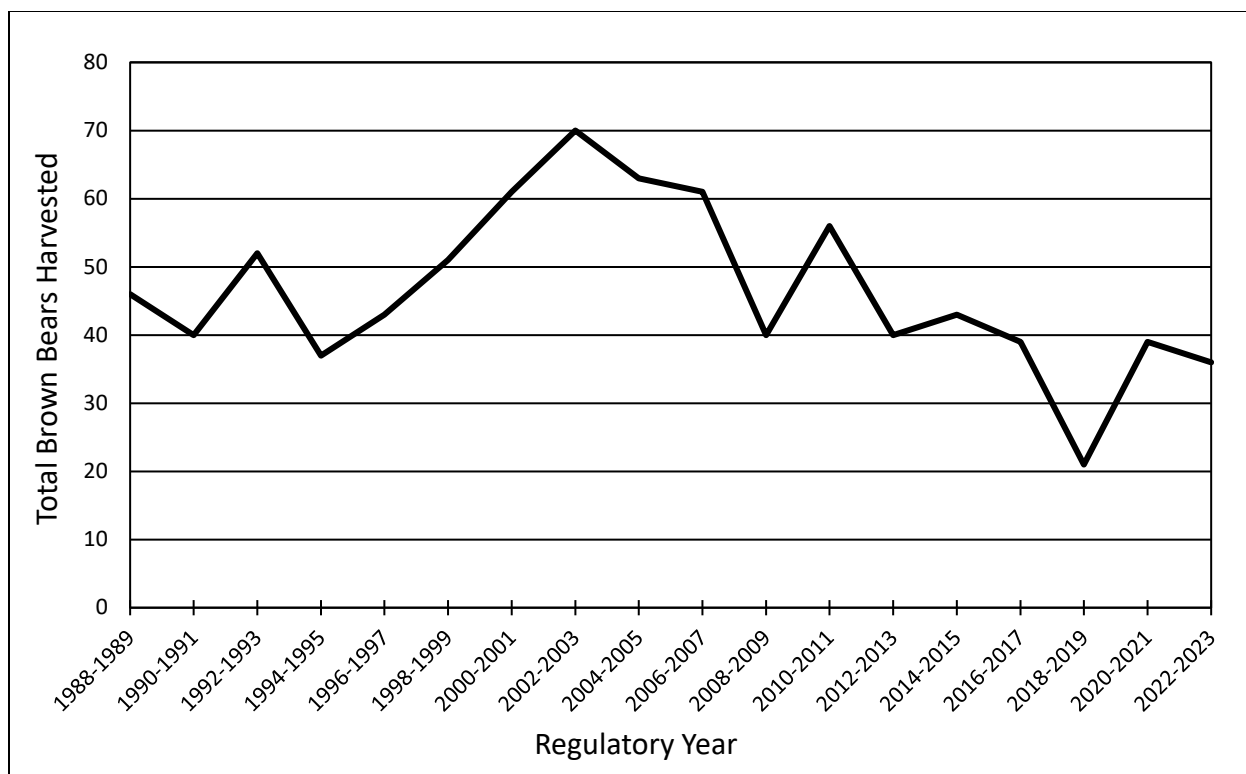


Figure 18-4. Total numbers of brown bears harvested in Unit 9C, regulatory years 1989–2023. Includes harvest from RB525.

DEPARTMENT COMMENTS: The department is **OPPOSED** to shortening the brown bear season dates in Unit 9C and establishing a draw permit for the portion in Katmai National Preserve. Average ages and skull sizes are not showing any declines and there are no conservation concerns with the brown bear population in Unit 9C due to the large area of refugia Katmai National Park provides. Harvest from lands within Katmai National Preserve has only comprised 16.6% of the total harvest for Unit 9C since regulatory year 2000, while contributing 27.2% of brown bear habitat open to the public for hunting. Implementing a draw hunt creates undue administrative burden when there is no conservation concern for brown bears in Unit 9C and no need to shorten seasons, reduce the number of bears taken annually, or the number of hunters that can participate.

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

PROPOSAL 19 - 5 AAC 85.060, Hunting season and bag limits for fur animals. Shorten the Arctic fox hunting season on the Pribilof Islands in Unit 10 for residents and nonresidents, and reduce the nonresident bag limit.

PROPOSED BY: Paula White

WHAT WOULD THE PROPOSAL DO? The proposal will decrease the resident and nonresident Arctic fox hunting seasons on the Pribilof Islands in Unit 10 by approximately 8 months from no closed season to November 10-February 28, and would decrease the nonresident bag limit from unlimited to 2.

WHAT ARE THE CURRENT REGULATIONS? The current Arctic fox hunting regulations for Unit 10 can be found in 5 AAC 85.060 and in the *2024–2025 Alaska Hunting Regulations*.

There is no limit and no closed season for Arctic fox hunting throughout Unit 10 for both residents and nonresidents.

There is a positive customary and traditional use finding (C&T) for fox in all units with a harvestable portion. The amount reasonably necessary for subsistence (ANS) is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reduces hunting opportunity and therefore harvest of Arctic foxes by residents and nonresidents; however, current harvest is unknown and so it is unclear how much opportunity or harvest would be lost. The effect of this proposal on residents would be the lack of ability to remove nuisance animals outside the hunting season and reduce overall hunting opportunity for residents.

BACKGROUND: The Pribilof Islands are a four-island archipelago in the Bering Sea, 300 miles from Alaska's mainland. The islands are part of the Alaska Maritime National Wildlife Refuge and were first discovered in 1786 by Russian fur traders. Most land on St. Paul and St. George Islands is privately owned by native corporations. Historical distributions of Arctic fox in Unit 10 (Figure 19-1) were drastically affected by human activities to benefit the fur industry. While there were many Arctic fox introductions on Unit 10 islands, they are considered indigenous to the Pribilof Islands. Arctic foxes are nomadic and travel great distances across their range, usually in a family group. In Alaska, the arctic fox migrates seaward in fall and early winter and will reverse movement in late winter and early spring. Studies have documented long-distance movements of several hundred kilometers. Mating occurs in early March through early April and gestation lasts 52 days. Litters average seven pups but may contain as many as 15 pups. Family units gradually break up during September and October and they lead mostly solitary lives in midwinter. Arctic foxes attain sexual maturity at nine to 10 months, but many die in their first year.

In Unit 10 there was a high of 319 Arctic foxes harvested in regulatory year (RY) 1977, 35 reported as trapped in 1987, and 14 blue-phase Arctic foxes in 1990. Household surveys were done specifically on St. Paul Island in 1994 and showed 62 arctic foxes were harvested. The significant effort put forth to eradicate introduced foxes off islands is a major contributing factor to the decrease in abundance and resulting low harvest for Unit 10. Trapping and hunting Arctic foxes are likely a source of income for residents in Unit 10 while nonresidents may harvest Arctic foxes as an addition to waterfowl and reindeer hunts. Arctic foxes are not required to be sealed by

residents or nonresidents, and the lack of reporting in trapping questionnaires has left little information to ascertain population trends or if current harvest is above or below sustainable levels. Research outside of the department has historically estimated >250 breeding pairs on each of St. Paul and St. George Islands. More recently, a standardized island-wide survey conducted in July 2023 on St. Paul documented a total of 57 active dens, 34 of which appeared to be natal, and pups were observed at 26 dens. Outside research suggests the declining population of Arctic foxes on the Pribilof islands is due to loss of natural food resources.

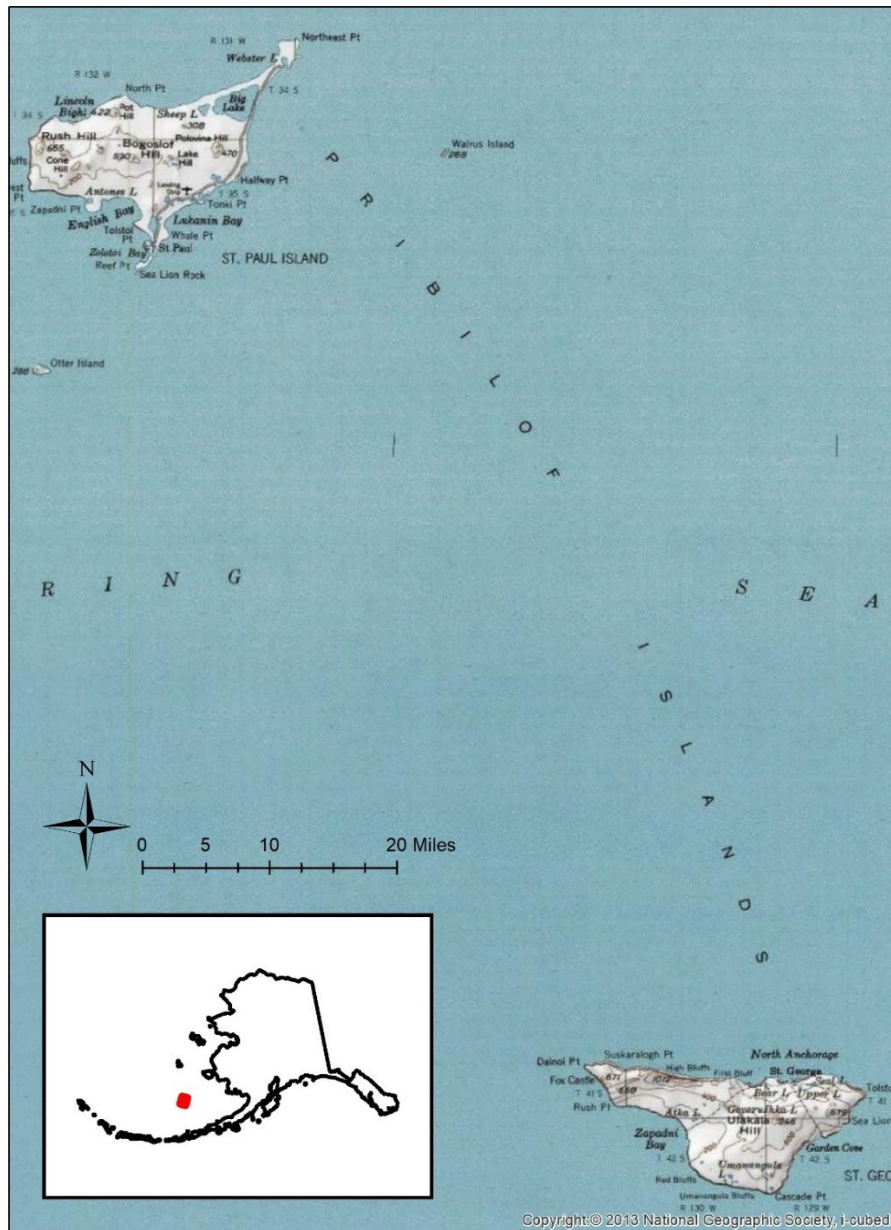


Figure 19-1. St. Paul and St. George Islands, Pribilof Islands, Unit 10.

This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. Both the ECO and the Tribal Council voiced concerns about the lack of monitoring of nonresident hunters' harvest of Pribilof foxes. However, they were not in consensus that the proposal would address fox conservation concerns without interfering with local harvest or removal of nuisance animals, or how it could be enforced.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of the proposal and **OPPOSED** to the reduced season dates and bag limits. If the board wants to reduce the hunting season, the department suggests the board consider the dates of September 1–April 30 to align the dates with Arctic fox seasons in other units, and at minimum to amend the closure date to the last day of February to address leap year and align with other “end of February” dates in regulation. Arctic foxes are considered indigenous to the Pribilof Islands and were not part of the introductions conducted on other Unit 10 islands. Without number of harvested foxes, chronology, and sex of harvested foxes it is unknown if the proposed changes to regulation will benefit the Pribilof Islands Arctic fox population. If the proposal is adopted, the board should consider whether the regulations will continue to provide reasonable opportunity for subsistence uses.

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

PROPOSAL 20 – 5 AAC 84.270, Furbearer trapping. Reduce the nonresident bag limit for Arctic foxes by trapping on the Pribilof Islands in Unit 10.

PROPOSED BY: Paula White

WHAT WOULD THE PROPOSAL DO? The proposal will decrease the nonresident bag limit on Arctic foxes that can be taken by trapping on the Pribilof Islands to 2 foxes.

WHAT ARE THE CURRENT REGULATIONS? The current Arctic fox trapping regulations for Unit 10 can be found in 5 AAC 84.270 and in the *2024–2025 Alaska Trapping Regulations*.

There is no resident or nonresident bag limit for Arctic fox under trapping regulations on the Pribilof Islands November 10–Last day of February.

There is a positive customary and traditional use finding (C&T) for fox in all units with a harvestable portion. The amount reasonably necessary for subsistence (ANS) is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reduces the bag limit for Arctic foxes that nonresidents can take under trapping regulations from an unlimited bag limit to 2 on the Pribilof Islands in Unit 10. However, current Arctic fox harvest

numbers and chronology by nonresidents is unknown, as such, the department does not know what, if any effect will occur from this proposal.

BACKGROUND: The Pribilof Islands are a four-island archipelago in the Bering Sea, 300 miles from Alaska's mainland. The islands are part of the Alaska Maritime National Wildlife Refuge and were first discovered in 1786 by Russian fur traders. The majority of land on St. Paul and St. George Islands is privately owned by native corporations. Historical distributions of Arctic fox in Unit 10 (Figure 20-1) were drastically affected by human activities to benefit the fur industry. While there were many Arctic fox introductions on Unit 10 islands, they are considered indigenous to the Pribilof Islands. Arctic foxes are nomadic and travel great distances across their range, usually in a family group. In Alaska, the arctic fox migrates seaward in fall and early winter and will reverse movement in late winter and early spring. Studies have documented long-distance movements of several hundred kilometers. Mating occurs in early March through early April and gestation lasts 52 days. Litters average seven pups but may contain as many as 15 pups. Family units gradually break up during September and October and they lead mostly solitary lives in midwinter. Arctic foxes attain sexual maturity at nine to 10 months, but many die in their first year.

In Unit 10 there was a high of 319 Arctic foxes harvested in regulatory year RY77, 35 reported as trapped in RY87, and 14 blue-phase Arctic foxes in RY90. Household surveys were done specifically on St. Paul Island in 1994 and showed 62 arctic foxes were harvested. A lot of effort was put forth to eradicate introduced foxes off Unit 10 islands which is a major contributing factor to the decrease in abundance and resulting harvest for Unit 10. Trapping and hunting Arctic foxes are likely a source of income for residents in Unit 10 while nonresidents may harvest Arctic foxes as an addition to waterfowl and reindeer hunts. A nonresident hunting and trapping license costs \$405. Arctic foxes are not required to be sealed by residents or nonresidents, and lack of reporting in trapping questionnaires has left little information to ascertain population trends or if current harvest is above or below sustainable levels. Research outside of the department has historically estimated >250 breeding pairs on each of St. Paul and St. George Islands. More recently, a standardized island-wide survey conducted in July 2023 on St. Paul documented a total of 57 active dens, 34 of which appeared to be natal, and pups were observed at 26 dens. Outside research suggests the declining population of Arctic foxes on the Pribilof islands is due to loss of natural food resources.

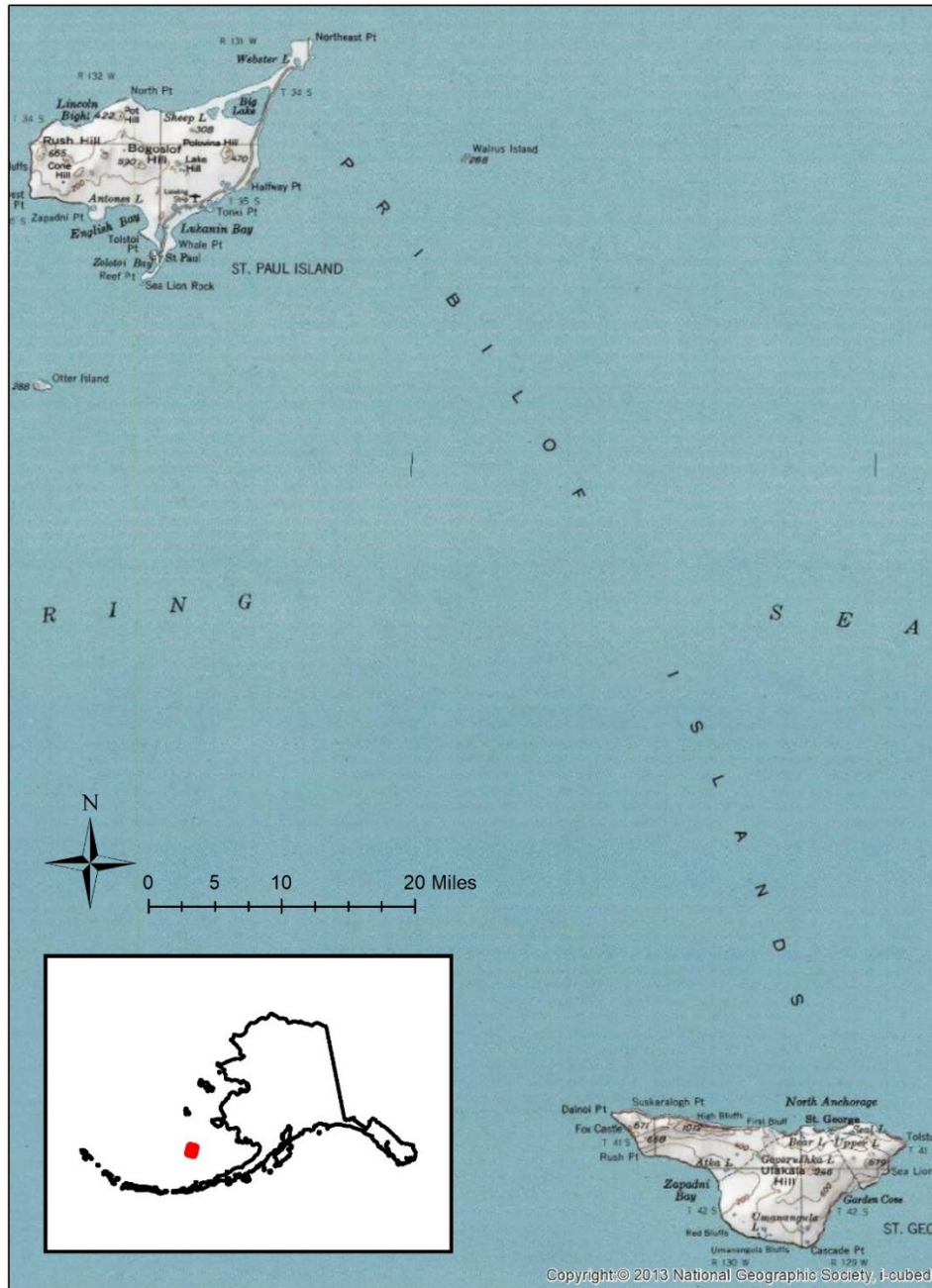


Figure 20-1. St. Paul and St. George Islands, Pribilof Islands, Unit 10

This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. Both the ECO and the Tribal Council voiced concerns about the lack of monitoring of nonresident trappers' harvest of Pribilof foxes. However, in the absence of both a monitoring program and any local enforcement authority, the Tribal Council expressed doubt as to how the proposed regulatory changes could be reasonably enforced.

DEPARTMENT COMMENTS: The department is **OPPOSED** to reducing the trapping bag limit for nonresidents. If approved, it would be the only furbearer trapping regulation where resident and nonresident bag limits are different. Arctic foxes are considered indigenous to the Pribilof Islands and were not part of the introductions conducted on other Unit 10 islands. A reduced bag limit for nonresidents could avoid potential undue hardship for residents living on the Pribilof Islands who may harvest Arctic foxes as a source of income, though it is unknown how many nonresident hunters trap more than one Arctic fox on the Pribilof Islands and if this proposal will have any effect. There are no changes proposed to the existing trapping season and no changes proposed for bag limits for residents.

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

PROPOSAL 21 - 5 AAC 84.270, Furbearer trapping. Remove the daily bag limit for beaver when taken by firearm with a trapping license in Unit 9.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal removes the 2 per day bag limit for beaver when taken by a firearm with a trapping license during April 15–May 31 in Unit 9, and clears up conflicting regulations found in 5 AAC 92.095 for beaver in Unit 9.

WHAT ARE THE CURRENT REGULATIONS? The current beaver trapping regulations for Unit 9 can be found in 5 AAC 84.270 and in the *2024–2025 Alaska Trapping Regulations*.

Unit 9 beaver trapping season is October 10–May 31 with no limit and firearms may be used to take up to 2 beaver per day from April 15–May 31 with a trapping license.

Firearms may also be used to take beaver throughout the seasons and with bag limits established in 5 AAC 84.

There is a positive customary and traditional use finding for beaver in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would result in increased beaver harvest opportunity and simplified regulations. There are currently no conservation issues with beavers in Unit 9 and removal of this bag limit is not expected to cause any decline in beaver populations.

BACKGROUND: Beavers primarily occur on the Unit 9 mainland north of Port Moller, from sea level to an elevation of about 2,000 feet. The most productive beaver habitat has been dependable stream flow with limited fluctuation adjacent to abundant and easily accessible willow, aspen,

cottonwood, or birch vegetation. Beaver harvest has declined from an annual average of about 460 in the 1970s, to 96 in the 2010s—a decline of 79%. The past 10 regulatory years (RY; 2012–2023) the average beaver harvest has continued to decline to 73 beavers (Figure 21-1). During the same period, the number of trappers sealing fur in Unit 9 declined by about 60%. The past 10 regulatory years, trapper numbers have continued to decline steadily (Figure 21-1).

The reduction in harvest during the 1990s was primarily attributed to reduced prices for beaver pelts, a high cost in both effort and expenses, and a diminished interest in trapping among village residents. Poor trapping and traveling conditions have likely contributed to the more recent reductions in harvest. Nuisance beaver issues are only a concern along the highway between King Salmon and Naknek.

Currently, those with a hunting license can take an unlimited number of beavers with a firearm in Unit 9 because the hunting season is open year-round and there is no bag limit. However, beaver harvest through trapping/snaring is still favored (Figure 21-2).

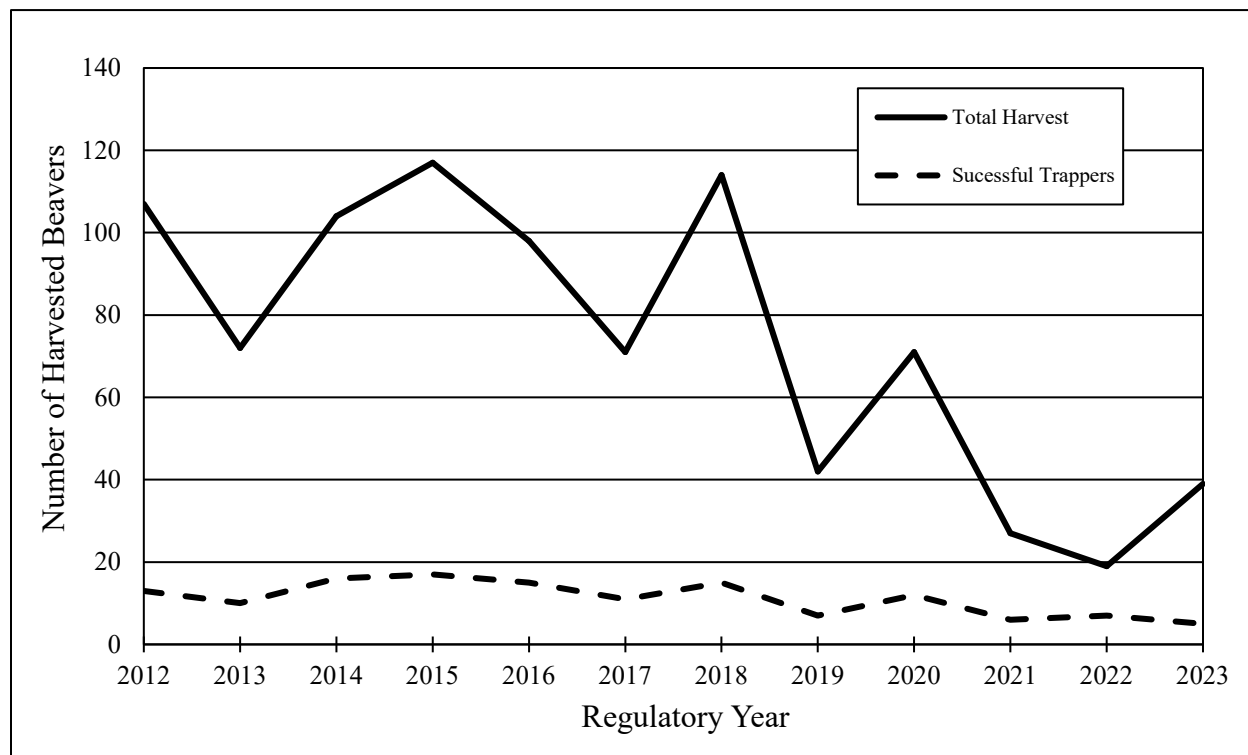


Figure 21-1. Number of harvested beaver and successful trappers in Unit 9, regulatory years 2012–2023.

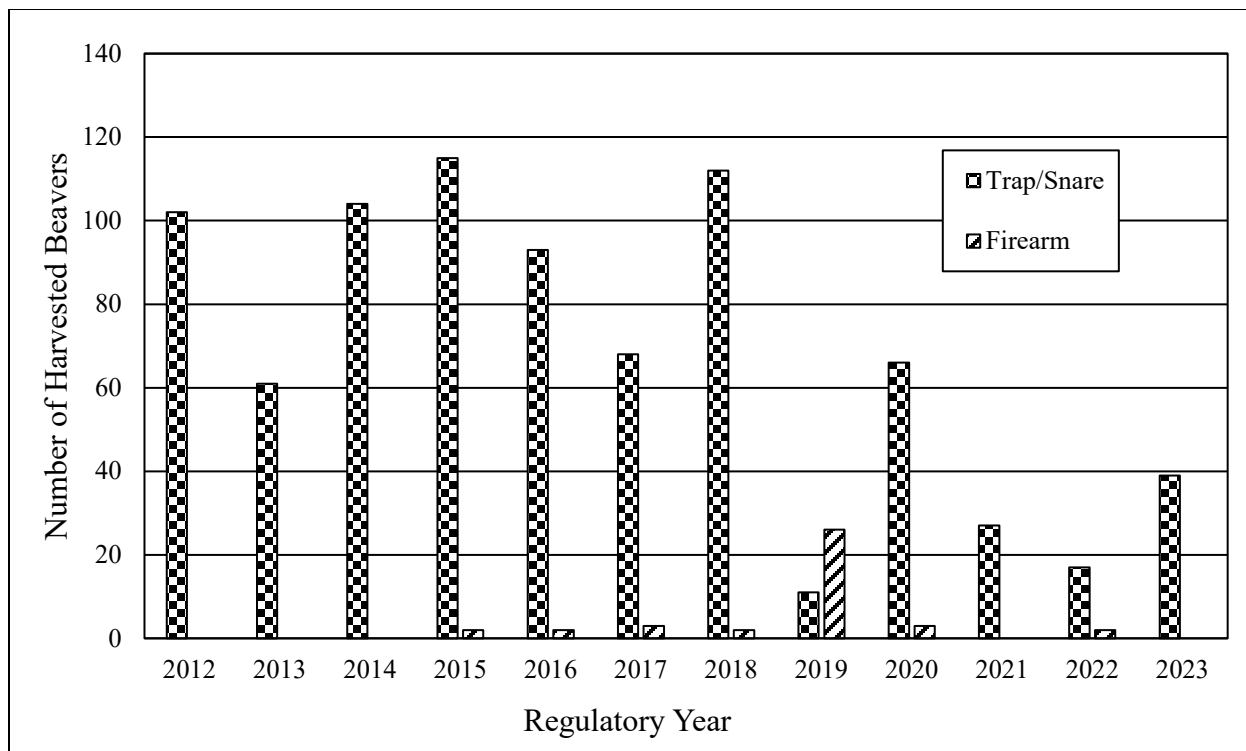


Figure 21-2. Unit 9 beaver harvest by method of take 2012–2023, excludes beaver taken by unknown method.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to remove the 2 per day bag limit for beaver when taken by firearm during April 15–May 31 in Unit 9 with a trapping license. Unit 9 currently has no bag limit for beaver under trapping and hunting regulations and no closed season under hunting regulations. The current bag limit by firearm is unnecessarily restrictive and conflicts with the regulation in 5 AAC 92.095 that allows the use of firearms for all trapping seasons and bag limits.

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

PROPOSAL 22– 5 AAC 85.057 Hunting seasons and bag limits for wolverine. Shorten the hunting season for wolverine in Unit 9.

PROPOSED BY: Graham Morrison

WHAT WOULD THE PROPOSAL DO? The proposal will shorten the hunting season for wolverines in Unit 9 by 1 month from ending March 31 to February 28.

WHAT ARE THE CURRENT REGULATIONS? The current wolverine hunting regulations for Unit 9 can be found in 5 AAC 85.057 and in the *2024–2025 Alaska Hunting Regulations*.

Current regulations allow the harvest of 1 wolverine by hunting for both residents and nonresidents from September 1 through March 31.

There is a positive customary and traditional use finding for wolverine in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If passed, this proposal would align with trapping season end dates in Units 9A, 9C, 9D, and 9E. There would be a small loss of hunting opportunity. Total wolverine harvest and trapper numbers have declined over the last decade in Unit 9 to where less than 10 individuals turn in wolverines for sealing annually.

BACKGROUND: Wolverines are found throughout Alaska at low densities and require large tracts of intact habitat. Research conducted in Southcentral Alaska showed a density of 4.5–5 wolverines per 1,000 square kilometers. No population estimates have been conducted in Unit 9.

Wolverines give birth between February and April with 2–3 kits per litter. Females reach sexual maturity in their second year, however, less than 10% of 2-year-olds produce litters. Due to their low reproductive rates, wolverines can be susceptible to overharvest in heavily trapped areas with no neighboring refugia for a source population. While this is not specific to hunting take, it is applicable to overall wolverine management considerations.

Wolverines have been harvested in Unit 9 for decades using traps, snares, and shooting. Annual harvest averaged 60 wolverines taken per year into the mid-1990s and has declined to an average of 16 wolverines taken per year for the past decade (regulatory years 2014–2023; Figure 22-1). The number of successful trappers has also declined from 20–40 prior to the 2000s to single digits in the last 4 years (Figure 22-1).

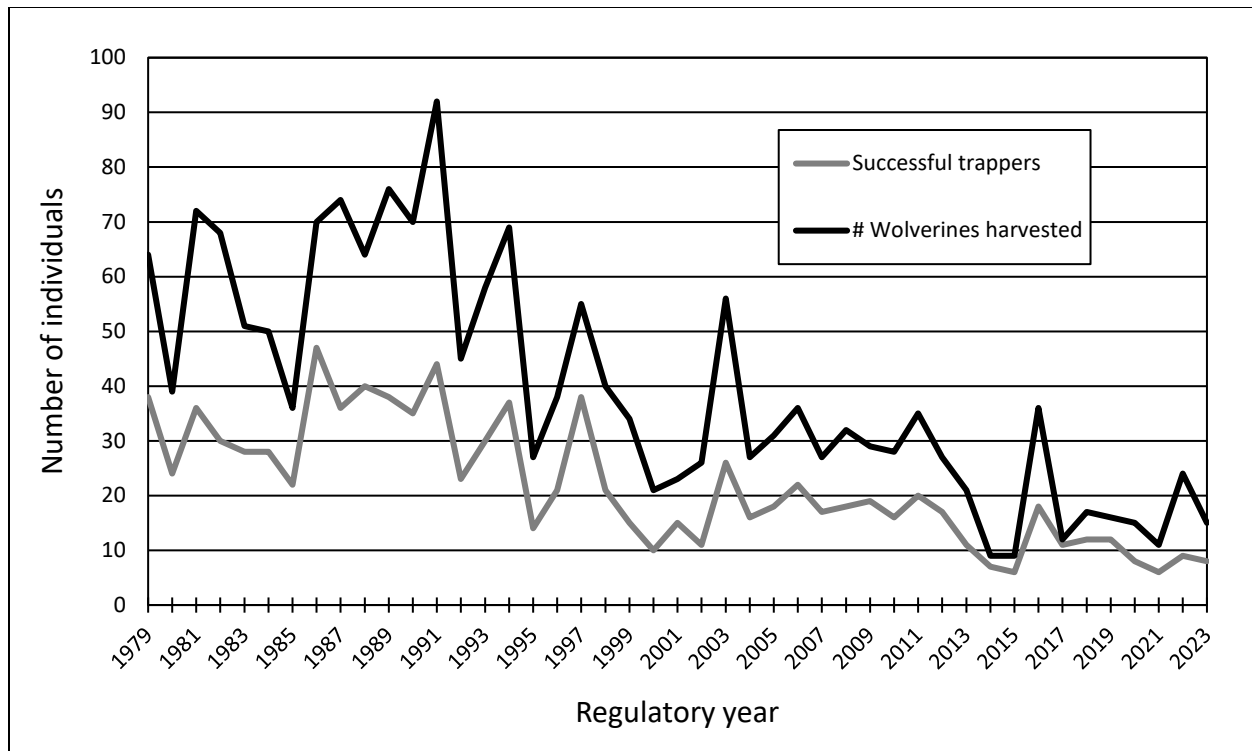


Figure 22-1. Number of successful trappers and wolverines harvested in Unit 9, regulatory years 1979 through 2023.

Most wolverines are harvested during the months of January, February, March, and December (Figure 22-2). March has the third highest proportion of females to males harvested at 0.4 (Figure 22-3), and historically had the fourth highest wolverine harvest per regulatory year but has increased to the third highest in the past 5 years. Shooting has become more common as the method of take during March in the past 5 years with the second highest ratio at 0.23; December has the highest ratio of wolverines taken by shooting at 0.42 (Figure 22-4). Fur prices and weather greatly influence trapper effort and success.

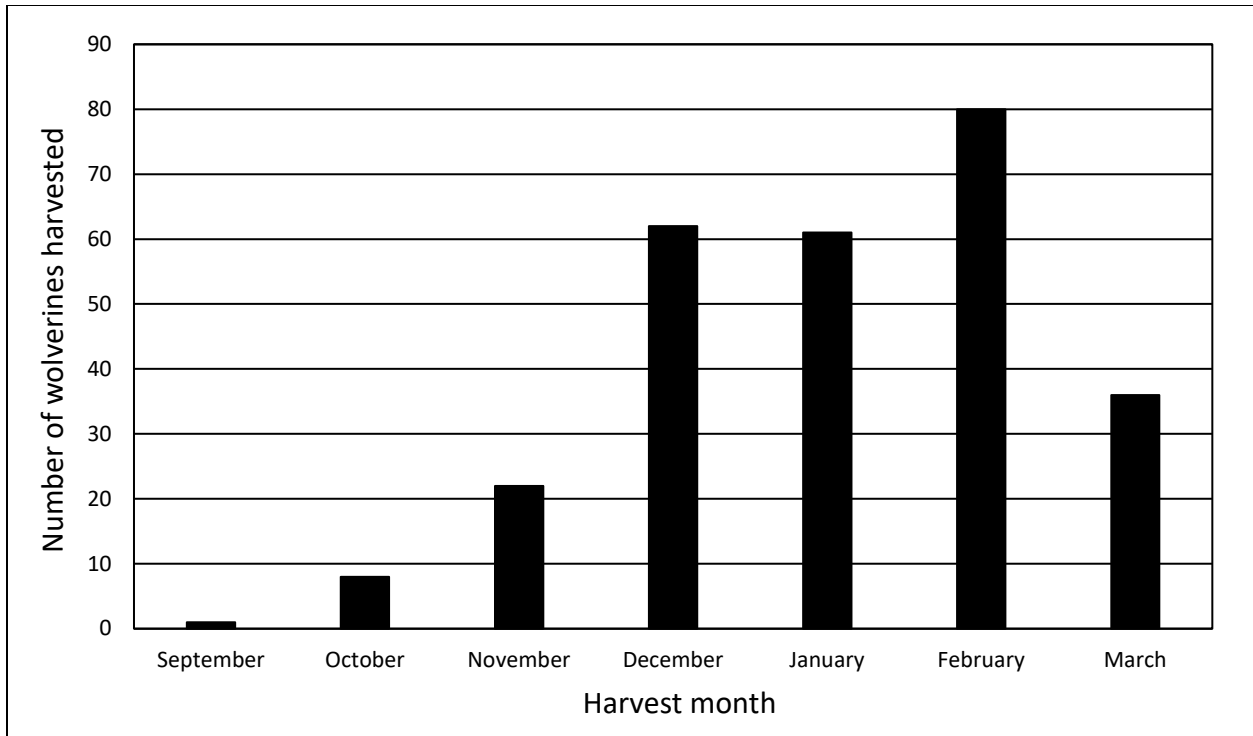


Figure 22-2. Total number of wolverines taken by month in Unit 9, regulatory years 2010 through 2023.

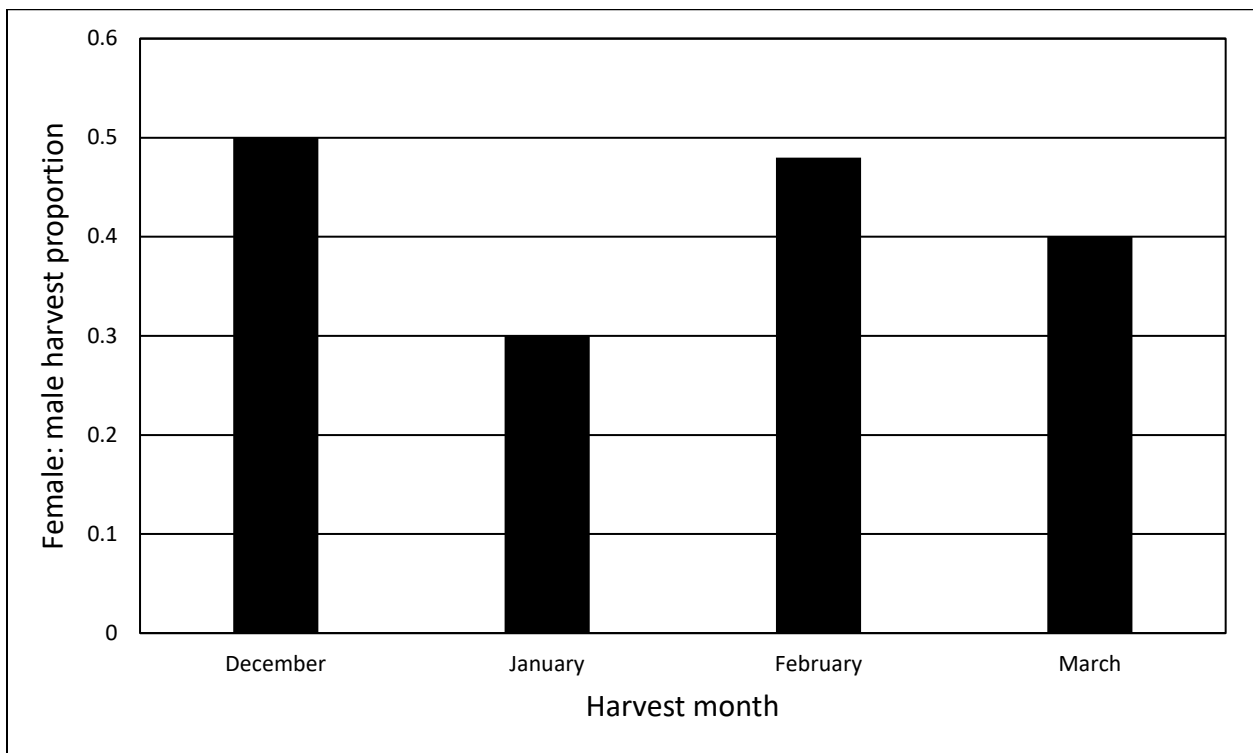


Figure 22-3. Ratio of female to male wolverines harvested in Unit 9, regulatory years 2010 through 2023.

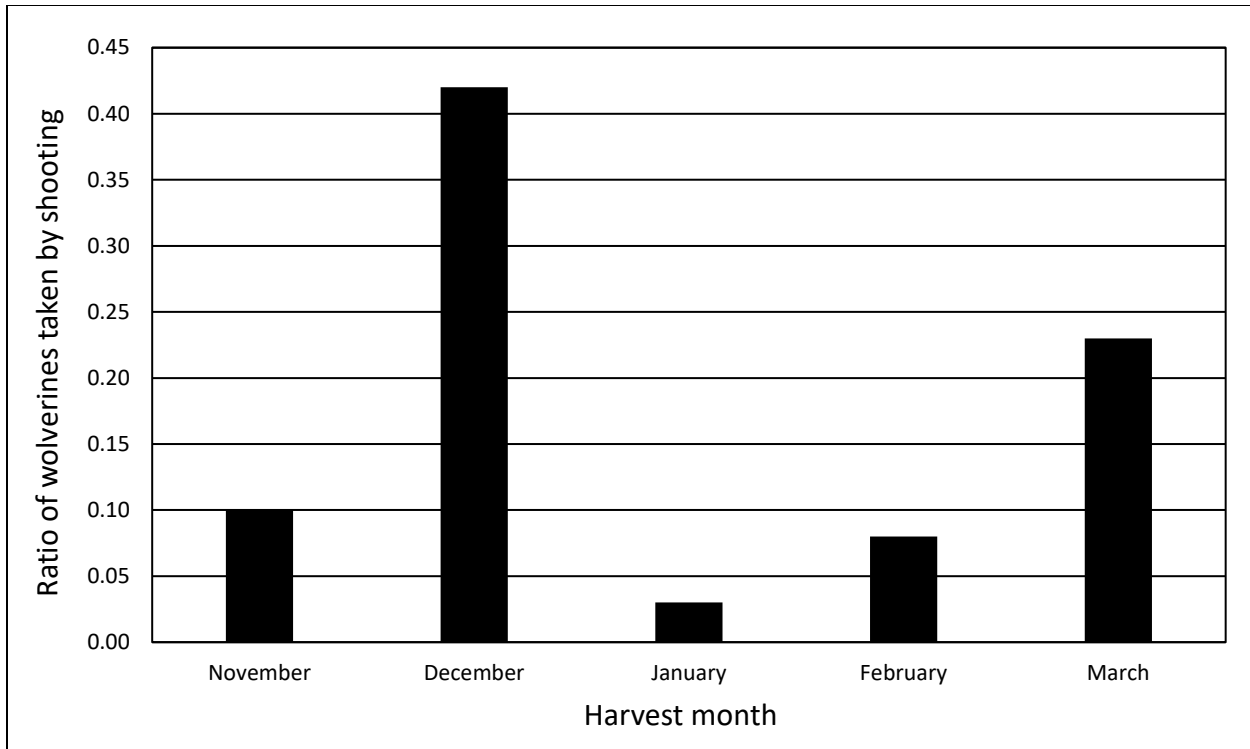


Figure 22-4. Ratio of wolverines harvested by shooting to total monthly harvest in Unit 9, regulatory years 2010 through 2023.

DEPARTMENT COMMENTS: The department is **OPPOSED** to shortening the wolverine hunting season and reducing opportunity for spring caribou hunters to opportunistically harvest a wolverine. The department has no population data for wolverines in Unit 9. Wolverine harvest has decreased since 2010 from a rolling 3-year harvest average of 30 to 17 wolverines. With no trapper effort or wolverine population data, it is assumed the decline is due to lower trapper numbers and effort, rather than declining population abundance. Trapping seasons in Units 9A, C, D, and E end the last day of February and the trapping season in Unit 9B ends March 31. The season ends later in Unit 9B because conditions in that subunit are more similar to Unit 17 and are less coastal than the other subunits in Unit 9. Few people specifically target wolverines while hunting and instead most are taken opportunistically by people traveling in wolverine country for other reasons. Denning females do not venture as far from dens as males, which is why males make up more of the harvest in March. If adopted, the board should determine if regulations continue to provide reasonable opportunity for subsistence uses of wolverine in Unit 9.

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

PROPOSAL 23 – 5 AAC 85.065(a)(4) Hunting season and bag limits for small game.
Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresidents.

PROPOSED BY: Jeff Wasley

WHAT WOULD THE PROPOSAL DO? The proposal seeks to increase the nonresident emperor goose draw permit allocation from 25 to 150 in Units 8, 9, 10, and the Izembek State Game Refuge (ISGR) and extend the season for the ISGR from 16 days (October 16 – October 31) to 62 days (October 16 – December 16).

Note: The proposal indicates the board will consider the request for Units 8, 9, and 10. However, Unit 8 is not on the call for proposals in the Central and Southwest Region.

WHAT ARE THE CURRENT REGULATIONS? The current regulation allows 25 nonresident drawing permits to be issued for hunting emperor geese in Units 8, 9, 10 and the ISGR as follows:

5 AAC 85.065(a)(4)(G)

	Resident Open Season	Nonresident Open Season
Units and Bag Limits	(General Hunt Only)	
(G) Emperor geese		

...

Units 8 and 10

RESIDENTS:

1 goose by registration permit only	Oct 8 – Jan 22
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NONRESIDENTS:

1 goose by drawing permit only; up to 25 permits may be issued in combination with Unit 9	Oct 8 – Jan 22
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Unit 9, that portion within the
Izembek State Game Refuge

RESIDENTS:

1 goose by
registration permit only

Oct 16 – Oct 31

NONRESIDENTS:

1 goose by drawing permit
only; up to 25 permits may be
issued in combination with
Units 8, the remainder of Unit 9,
and 10

Oct 16 – Oct 31

Unit 9, remainder

RESIDENTS:

1 goose by
registration permit only

Sept. 1 – Dec. 16

NONRESIDENT HUNTERS:

1 goose by drawing permit
only; up to 25 permits may be
issued in combination with
Units 8, that portion of Unit 9
within the Izembek State Game
Refuge, and 10

Sept. 1 – Dec. 16

There is a positive customary and traditional use finding (C&T) for migratory game birds in all units with a harvestable portion except within the nonsubsistence areas defined in 5 AAC 99.015.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the proposal would provide additional opportunity for nonresidents to hunt emperor geese by increasing the number of drawing permits available from (up to) 25 to 150. Also, the proposed change will provide more hunting opportunity to residents and nonresidents in the ISGR by extending the season length from 16 days to 62 days.

BACKGROUND: The general season for emperor geese was closed in 1986 to allow the population to recover from low abundance. After 30 years of closure, the general season was

reopened in 2017 under a federal allowance of 1,000 emperor geese per season. The Board of Game (board) established seven hunt areas across the annual range of emperor geese; and allocated the 1,000-bird quota across these hunt areas. The hunt is administered using a registration permit system for Alaska residents that allows a permit holder to harvest one emperor goose per season in any one of the hunt areas. Registration permits are free and available in unlimited numbers. Hunt areas are closed by Emergency Order if the individual quota is met or after the last day of the season, whichever is first. Proxy hunting of emperor geese is also allowed for residents, following all standard eligibility requirements. The board also authorized a drawing permit hunt beginning in 2018 that allowed up to 25 nonresidents to hunt emperor geese. A drawing permit is applicable in a single hunt area that is split into 4 zones with hunt conditions (e.g., zone boundaries, season dates, harvest quota, Emergency Closure, etc.) defined by the corresponding resident hunt areas (Units 8, 9, 10, and the ISGR). A nonresident with a drawing permit may hunt in any of the 4 hunt zones and take 1 emperor goose per season.

Federal frameworks regulations for the emperor goose general hunt season are guided by the harvest strategy in the Pacific Flyway Council's Emperor Goose Management Plan (Plan; http://pacificflyway.gov/documents/eg_plan.pdf). The harvest strategy is based on using the indicated total bird index (index) from the Yukon-Kuskokwim Delta Coastal Zone (Coastal Zone) survey conducted by the U.S. Fish and Wildlife Service–Alaska Region (Service–Alaska) to assess population status relative to prescribed population thresholds. The harvest strategy specifies that the general season will be open with a federal quota of 1,000 birds if the Coastal Zone index from the previous year is greater than 23,000 birds, and harvest will be closed if the index is below this threshold. If the Coastal Zone index from the previous year is between 23,000 and 28,000 birds, the federal quota will be reduced to 500 birds, a permit is required and allowable take under the reduced statewide quota remains at 1 bird per hunter per season.

In 2019, the Coastal Zone index dropped below 28,000 birds and the federal quota was set to 500 birds for the fall-winter hunt in 2020 and remained at 500 birds through the 2024 season. In summer 2024, the Coastal Zone index was 18,788 (95% CI = 16,589–20,988), below the 23,000-bird threshold that triggers a closed season. Accordingly, the Pacific Flyway Council and the U.S. Fish and Wildlife Service agreed to close emperor goose hunting for the 2025–2026 season. Reopening the season will be considered when the Coastal Zone index shifts above the 23,000-bird threshold.

In the last 7 hunting seasons (2017–2023), the average number of emperor goose permits issued to Alaska residents was 459; of which an average 49.0% of hunters participated in the hunt. Alaska resident hunting success was 60.0% for an average annual reported harvest of 135 emperor geese across hunt years (Table 23-1). The average reporting rate for Alaska residents was 94%. Most emperor geese were harvested in the southernmost hunt areas with only four geese harvested in the three northern Units (Table 23-1). In 2018–2023, the number of nonresident applications received for the draw hunt were 1,235; 1,736; 2,129; 2,721; 2,764; and 3,192, respectively. Assuming each applicant submitted 6 draw entries, the number of applicants in each year was 205,

289, 354, 453, 460, and 532. All 25 nonresident draw permits were awarded each year, and the average annual reported harvest was 22 geese. About 68% of the nonresident emperor goose harvest was in the Cold Bay area.

Table 23-1. Emperor goose permit hunt 2017 – 2023 (with current 500 bird quota allocation)			
Hunt areas - quota	Avg Permits Issued	Avg No. Hunted	Avg No. Harvested R: NR
Unit 8 – 150 birds	206	84	41: 2
Unit 9/17 – 100	102	72	54: 15
Izembek SGR - 50	32	12	8: 1
Unit 10 – 125	80	49	32: 4
Unit 18 – 25	20	3	1
Unit 22 – 25	12	4	1
Unit 23 – 25	6	1	0

In 2017, the board set the season dates in the hunt areas to follow the dates set for the Migratory Bird Hunt Zones in which they occur, except for the ISGR. The board adopted an abbreviated season of 16 days for the ISGR due to anticipated high public interest in the hunt at a popular hunt area that is geographically smaller. Over the last 7 seasons, the average number of permits issued for the ISGR was 32 and the average annual harvest was 8 birds for residents and 1 bird for nonresidents (Table 23-1). For context, most of the harvest in Units 9&17 occurs in the Cold Bay area adjacent to the ISGR with an average annual harvest in 2018 – 2023 of 69 birds across a 107-day season (Table 23-1).

DEPARTMENT COMMENTS: The department recommends the board **TAKE NO ACTION** on the proposal. The 2025 fall-winter hunt of emperor geese is closed due to low population status in agreement with the management plans and it is unlikely the index will provide an opportunity to reopen the hunt in the near future. However, the department notes two items for the board to consider: 1) revisions to the harvest strategy in the plans are forthcoming and may result in recommended changes to the federal bird quota; and 2) past subsistence harvest survey data indicates that reported harvest from the fall-winter permit hunt is likely a smaller fraction of the total fall-winter harvest, suggesting that unreported harvest might also be considered in allocative decisions.

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

PROPOSAL 24 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Close the season for Alaska hares in Units 9 and 17.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Close the hunting season for Alaska hares in Unit 9 and Unit 17 for residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS? Currently regulations allow for one Alaska hare per day, and four total from November 1–January 31 in Game Management Units (Units) 9 and 17 for both resident and nonresident hunters.

The Board of Game has made a positive customary and traditional use finding for Alaska hares throughout their range in Alaska (Units 9, 10, 17, 18, 22, and 23). No determination of ANS has been made.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would close the hunting season for Alaska hare in Units 9 and 17 for resident and nonresident hunters. The hunting public would lose hunting opportunity for this species, however regulations for the more abundant snowshoe hare would remain with no bag limit and no closed season in these units.

BACKGROUND: Alaska hare (locally referred to as “jackrabbit” or “tundra hare”), one of two species of hare found in Alaska, are an endemic species that were once abundant in western coastal areas. The historical range of the species extends from Cold Bay on the Alaska Peninsula north to Kotzebue on the Baldwin Peninsula and encompasses Units 9, 17, 18, 19, 22, and 23. Historical accounts suggest that Alaska hares were relatively abundant in areas across their range until the early 1980s; however more recent observations and comments from the public suggest a much lower abundance of Alaska hare throughout much of its range. This concern prompted action by the Board of Game at the 2018, 2020, and 2022 meetings to create season dates, daily and annual bag limits and salvage requirements. At the same time, ADF&G initiated a research project (2018–2022) to learn more about the species and find an appropriate method for monitoring abundance. Results from this research suggest densities of Alaska hares remain very low in Units 9 and 17 (Table 1). Despite the changes made to the hunting regulations in 2018 and 2022, there is a continued conservation concern regarding Alaska hare in Units 9 and 17. The department anticipates future survey and monitoring efforts to continue in various areas of their current range.

Table 1. Alaska hare summary information of surveys conducted in Units 9 and 17. All surveys produced a minimum count estimate of Alaska hares, however 2020-2022 surveys completed in Ekuk, AK also contained repeated sampling efforts within the same survey location. Fecal pellet samples reported below only include samples with successful DNA analysis.

Unit 9 - King Salmon

Year	Agency	Survey Transportation	Estimated survey distance	Pellet Samples	# of Alaska hares	Sex ratio M:F
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2018	ADF&G	Vehicle and Foot	75km	0*	0	NA
2023	USFWS	Snowmachine	475-650km	8	3	2:1
2024	USFWS	Fixed-wing aircraft	~1,700km	56	26	NA

Unit 17 - Dillingham/Ekuk

Year	Agency	Survey Transportation	Estimated survey distance	Pellet Samples	# of Alaska hares	Sex ratio M:F
2017	ADF&G, Contractor	Snowmachine and Foot	15-20km	4	3**	2:1
2020	ADF&G, Contractor	Snowmachine	150-250km	64	6	4:2
2021	ADF&G, Contractor	Snowmachine	350-400km	45	12***	7:5
2022	ADF&G, Contractor	Snowmachine	150-250km	11	2	1:1

Notes: * During 2018 collections in King Salmon 10 Alaska hare samples were collected, however a rain event occurred resulting in DNA analysis failure. **2017 survey information collected during a pilot study establishing a sampling technique and proof of concept DNA analysis. ***In 2021, Three of the twelve individual Alaska hares sampled in Ekuk we also sampled during the 2020 surveys.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal due to conservation concerns regarding the Alaska hare population in Units 9 and 17. Recent research efforts indicate very low hare density. This combined with anecdotal information from communities in southwest Alaska prompted the department to submit this proposal. The proposal is intended to spur discussion on Alaska Hare populations and to gather additional information and comments from Advisory Committees and the public. If adopted, the board will need to determine how the closure impacts reasonable opportunity for subsistence uses.

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

PROPOSAL 25 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Increase the number of drawing permits issued to nonresidents in Unit 17A

PROPOSED BY: Gabe Davis

WHAT WOULD THE PROPOSAL DO? The proposal would provide up to 50 draw permits for nonresident moose hunters under DM570 in Unit 17A.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2024-2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Unit 17(A)		
Up to 2 moose per regulatory year,		
only as follows:		
RESIDENT HUNTERS:		
1 moose by registration permit only or;	Aug. 25 – Sept. 25. (Subsistence hunt only)	
1 antlered bull by registration permit only or;	Jan. 1 – Last day of Feb. (Subsistence hunt only)	
1 antlerless moose by registration permit only	Jan. 1 – Last day of Feb. (Subsistence hunt only)	
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 50 permits may be issued.		Sept. 5 – Sept. 15
...		

Unit 17A has a negative Intensive Management (IM) finding.

There is a positive customary and traditional use (C&T) finding for moose in Unit 17, with an amount reasonably necessary for subsistence (ANS) of 100–150 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be no change. The department has the discretionary authority to issue up to 50 permits to nonresident moose hunters for DM570 in Unit 17A. Currently, only 20 permits are issued based on the agreed upon management plan by the department, Togiak National Wildlife Refuge (Refuge), and local ACs.

BACKGROUND: Moose have occupied the Togiak and Kulukak drainages since before statehood when their numbers were few and harvest pressure was high. This trend of low moose

numbers continued throughout the 1980s despite a closure to moose hunting implemented in 1981. During the same time, moose numbers were increasing in the Nushagak Bay drainages (Unit 17C) to the east providing a source of moose to emigrate west into Unit 17A. In 1995, a cooperative survey was conducted with Togiak National Wildlife Refuge (Refuge) and the department estimated 136 moose in Unit 17A. From this initial survey in 1995 through 2022, the population has been closely monitored with periodic population estimates which have revealed a progressive and substantial increase in moose numbers. The last 4 population surveys between RY16–RY22 have reflected a population that is over the management objective of 1,750 moose (Figure 25-1).

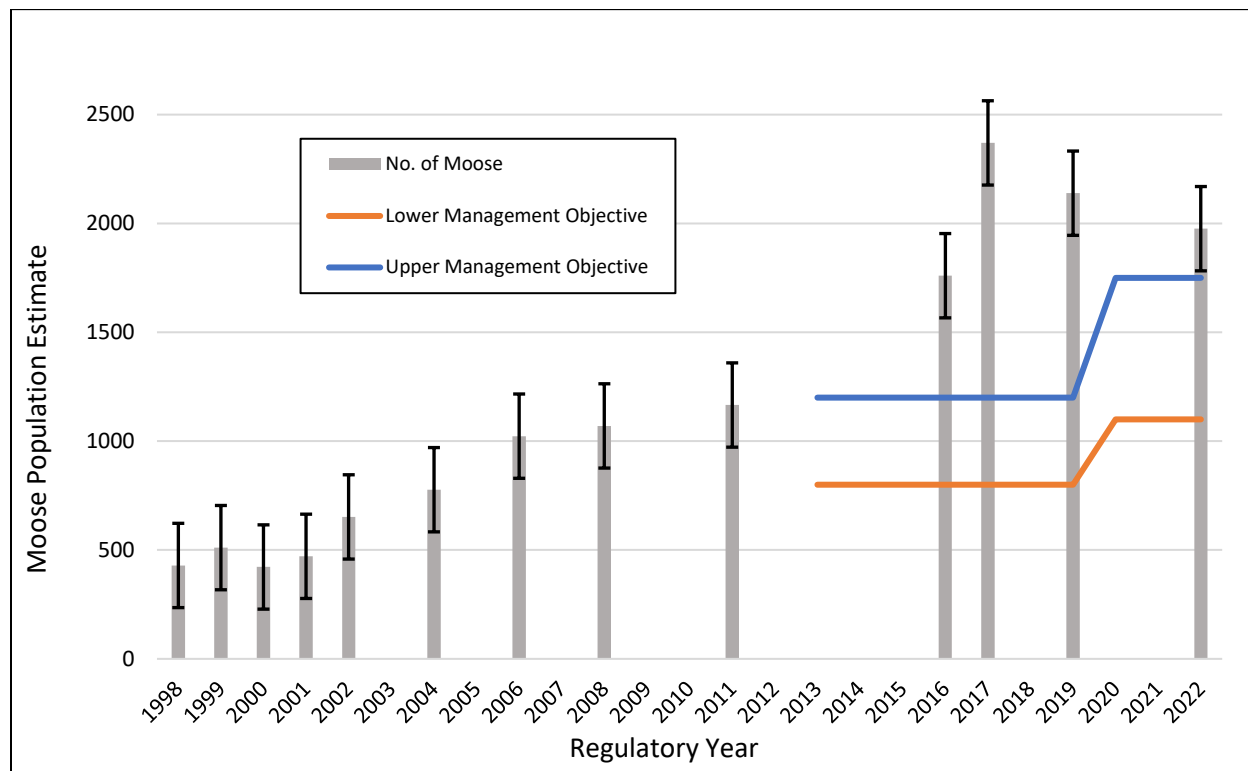


Figure 25-1. Unit 17A moose population estimates from RY98–22 corrected for sightability. Estimates from RY16, RY19, and RY22 population surveys occurred in the fall without snow cover.

Since DM570 became available, moose harvest by nonresidents has stayed relatively steady with a high of 10 moose harvested in RY16, a low of 3 moose in RY22, and a 10-year average of 5 moose harvested (Figure 25-2). Twenty permits have been available since RY14 except for RY21 when 30 permits were available for drawing. The increased number of permits awarded in RY21 was not supported by local residents of Togiak as communicated through the Togiak advisory committee. Participation is generally high for those who draw permits ranging from 40%–90% with an average of 62% annually of permit holders who chose to hunt (n=12).

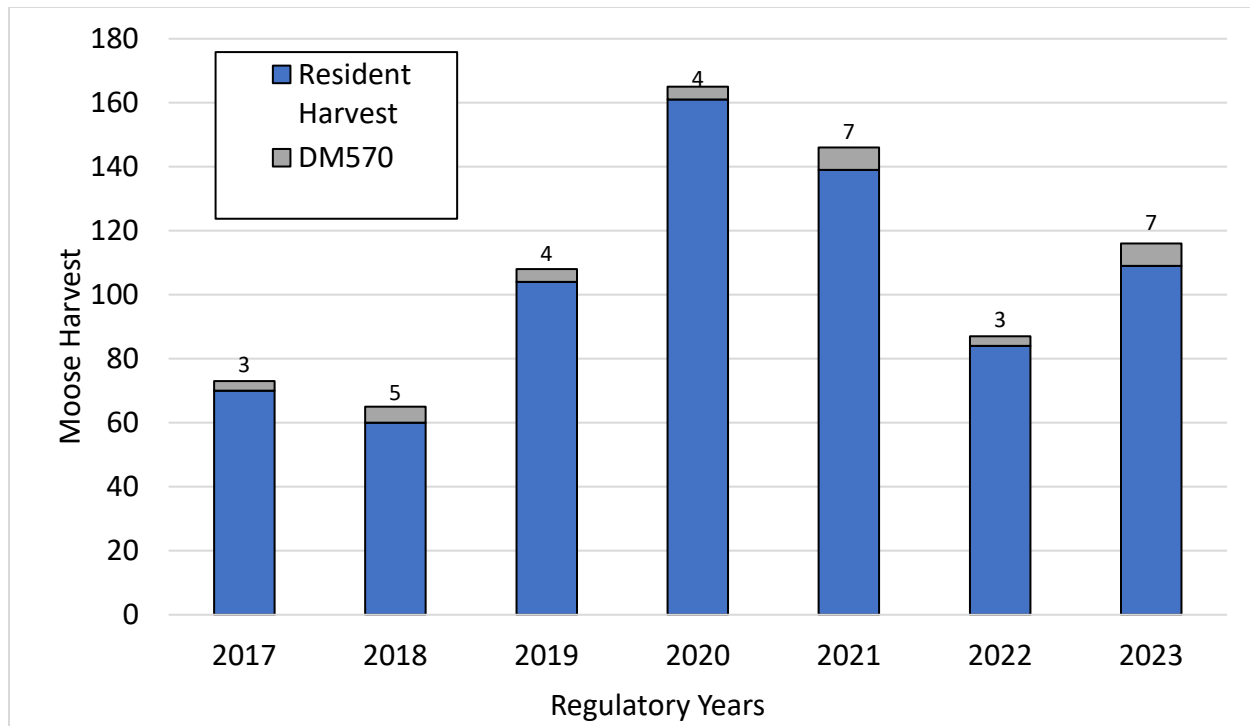


Figure 25-2. Unit 17 Nonresident hunter participation in DM570, RY2014–23.

Moose in 17A are managed cooperatively with the Refuge through a Unit 17A moose management plan enacted in 2013 with the department, the Refuge, local advisory committees (ACs), and regional advisory councils (RACs). Although this plan was not adopted by BOG, it remains the guiding document for Unit 17A moose management. This moose working group originally agreed to a management objective for moose in Unit 17A from 800 to 1,200 moose; when the population exceeded 1,200 moose, no more than 20 nonresident permits would be issued. In 2020, the management plan was changed to increase the population objective from 800 - 1,200 to 1,100 - 1,750, and incremental liberalization of the moose season followed. In 2013, a 2 moose bag limit was established during a “may be announced” winter season (RM575), and in 2014 the 2 moose bag limit allowed one bull (RM575) and one cow (RM576). Further, in 2018, a registration hunt for antlerless moose in the fall (RM571) was established and the fall season was extended to end September 25 for residents (Figure 25-3). Set season dates of January 1 to the last day in February were approved at the 2022 Central-Southwest Board meeting for RM575 and RM576. Even with liberalization of the regulations for residents to a 2 moose bag limit, the population still remains above the management objective. In 2013, a corridor was established prohibiting aircraft access for moose hunting during the fall season extending 2 miles to either side of Togiak, Nayorurun, Kemuk, Ongivinuk, and Izavieknik rivers and Togiak and Upper Togiak lakes. (Figure 25-5). This regulation effectively reduces competition between local residents and nonlocal residents and nonresidents but also limits the level of harvest needed to slow the trajectory of this growing population.

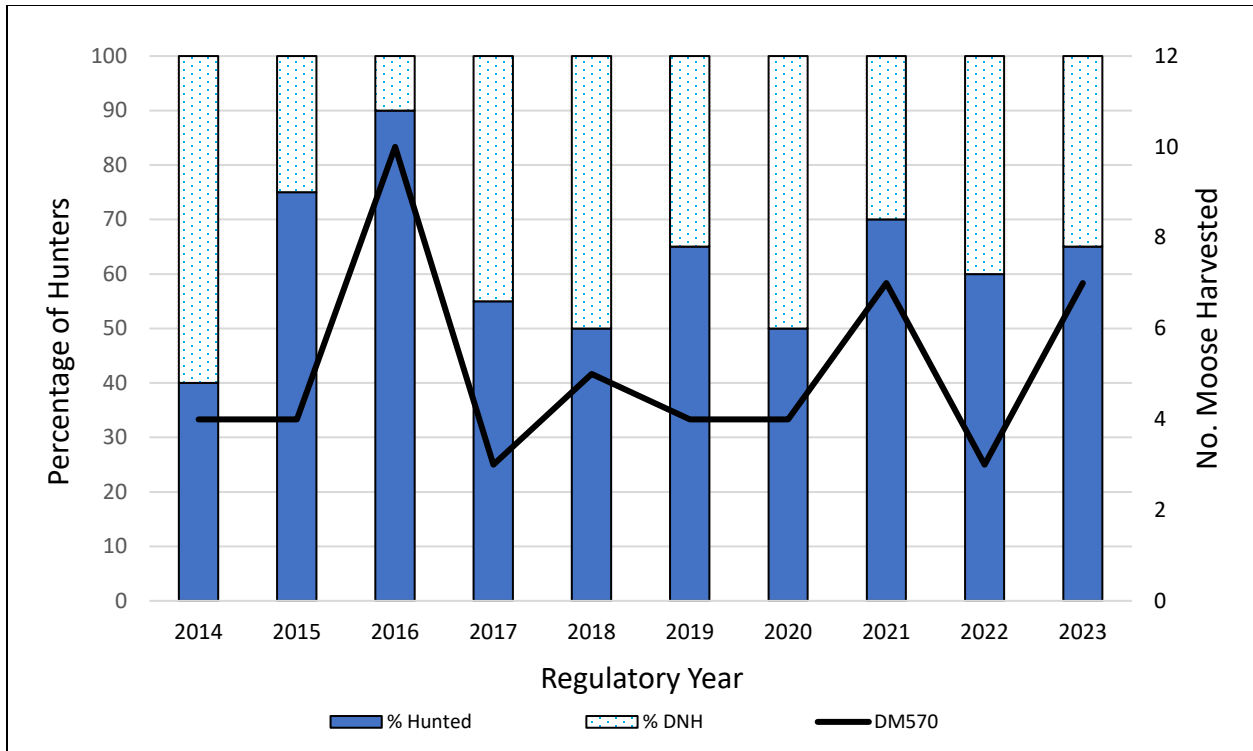


Figure 25-3. Nonresident hunter participation and harvest under permit DM570 from regulatory years RY2014–2023.

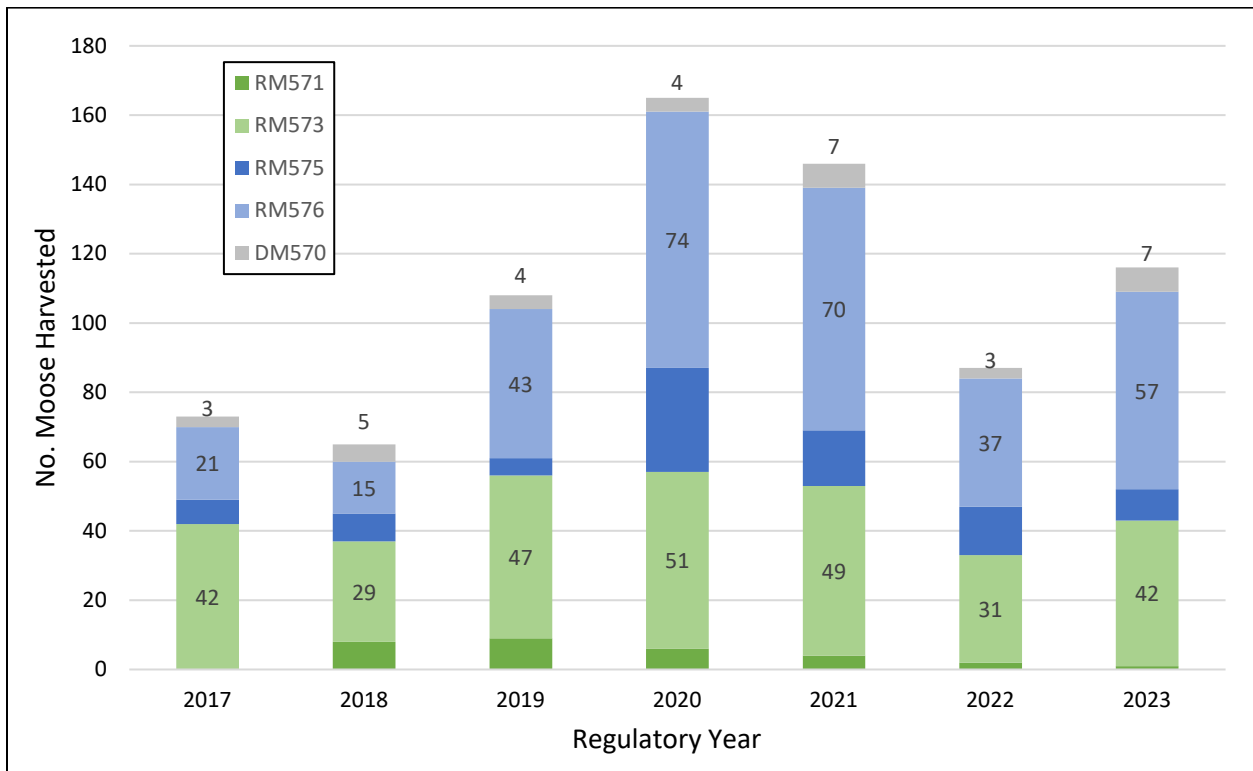


Figure 25-4. All reported moose harvest in Unit 17A by permit, RY2017–2023.

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.



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17A. Most access for nonresidents is via floatplane at small lakes and ponds, with one river that is occasionally floated. Additional permits may decrease the quality of the hunt by forcing multiple camps at the same access points and create competition for the same moose between nonlocal residents and nonresident hunters who access Unit 17A via aircraft.

There is a slight decrease in the population trend, although the surveys were conducted without snow cover and thus may be an underestimate due to lower detection rates. Recent calf survival to 6 months has decreased likely due to bear predation (pers. communication A. Aderman 2024). Management objectives for this population recognize the importance of this population expanding into neighboring areas to provide additional harvest opportunities. This population is likely responsible in part for the recent growth of adjacent populations, particularly in the north and west into southern and eastern Unit 18.

DEPARTMENT COMMENTS: The department is **NEUTRAL** because it currently has the ability to issue up to 50 permits. Given the population, only 20 permits are issued due to the agreed upon management plan by the department, Refuge, and local ACs,. Additionally, the aircraft restriction corridor in place substantially reduces access to Unit 17A for nonlocal resident and nonresident moose hunters that may compete with local resident hunters in the boat accessible areas along the mainstem of the Togiak drainage and its major tributaries.

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

PROPOSAL 26 – 5 AAC 85.045. Moose season and bag limits. Lengthen the nonresident drawing permit DM570 hunting season in Unit 17A.

PROPOSED BY: Gabe Davis

WHAT WOULD THE PROPOSAL DO? The proposal would lengthen the nonresident moose hunting season by 10 days total, 5 days at the beginning and 5 days at the end, from September 5 - 15, to September 15 - 20.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		
...		
Unit 17(A)		
Up to 2 moose per regulatory year,		

only as follows:

RESIDENT HUNTERS:

1 moose by registration permit only or;	Aug. 25 – Sept. 25 (Subsistence hunt only)
1 antlered bull by registration permit only or;	Jan. 1 – Last day of Feb. (Subsistence hunt only)
1 antlerless moose by registration permit only	Jan. 1 – Last day of Feb. (Subsistence hunt only)

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 50 permits may be issued	Sept. 5 – Sept. 15
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Unit 17A has a negative Intensive Management (IM) finding. There is a positive customary and traditional use (C&T) finding for moose in Unit 17, with an amount reasonably necessary for subsistence (ANS) of 100–150 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increased nonresident moose hunting opportunity from a lengthened season may increase the number of mature bulls taken under current antler restriction regulations, and thus should have no biological impact on the greater population which is currently above management objective. Currently, hunters who access Unit 17A by airplane are prohibited from hunting moose along the main stem of the Togiak River and lower sections of its major tributaries, to reduce competition between nonlocals and locals, who primarily hunt by boat. The lengthened nonresident season may receive scrutiny from residents because of perceived increased competition for the same resource. The adoption of this proposal is not expected to have any biological consequence and may offer increased nonresident participation due to a longer season date range. DM570 has an average of 12 participants (Figure 26-3) and thus adoption of a lengthened season is likely to result in both increased nonresident participation and harvest success.

BACKGROUND: Moose have occurred in the Togiak and Kulukak drainages since before Statehood, their numbers were few and harvest pressure was high. This low population trend in the Togiak drainage continued throughout the 1980s despite a closure to moose hunting implemented in 1981. During the same time, numbers were increasing in the Nushagak Bay drainages (Unit 17C) to the east providing a source of moose to emigrate west. In 1995, a

cooperative survey with Togiak National Wildlife Refuge (hereafter referred to as the Refuge) and the Department estimated 136 moose in Unit 17A. From this initial survey in 1995 through 2022, the population has been closely monitored with periodic population estimates which have revealed a progressive and substantial increase in moose numbers. The last 4 population surveys between RY16–RY22 have reflected a population that is over management objective of 1,750 moose(Figure 26-1).

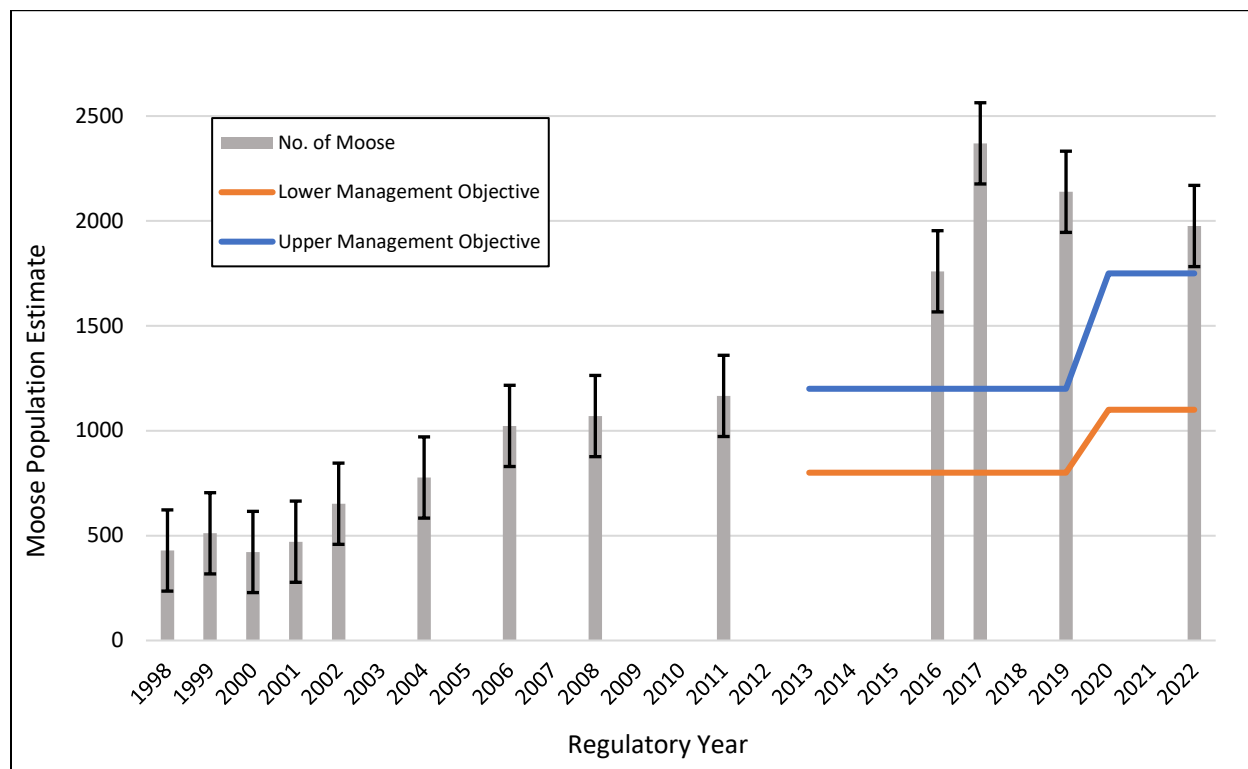


Figure 26-1. Unit 17A moose population estimates from RY98-22 corrected for sightability. Estimates from RY16, RY19, and RY22 population surveys occurred in the fall without snow cover.

Nonresidents may only harvest bull moose in Unit 17A with drawing permit DM570, and there are usually 20 permits available annually. Nonresident moose harvest has stayed relatively steady with a high of 10 moose harvested in RY16, a low of 3 moose in RY22, and a 10-year average of 5 moose harvested (Figure 26-2). Nonresident participation is variable but over the 10-year period averages 62% (range 40–70) and harvest generally tracks with the number of participating hunters. Nonresident moose harvest in 17A makes up an average of 6% of the moose harvest in Unit 17A between RY17–23 with a low of 2% in RY20 and a high of 15% in RY23.

The proposal may allow for increased participation because of the longer season. Increased nonresident participation over a larger date range is unlikely to have biological impacts due to the low number of permits issued and the current aircraft restriction corridor within Unit 17A. As noted above, the aircraft restriction was put in place to decrease the spatial overlap of local resident

hunters who primarily utilize skiffs for access, and nonlocal hunters who access Unit 17A via aircraft from Dillingham.

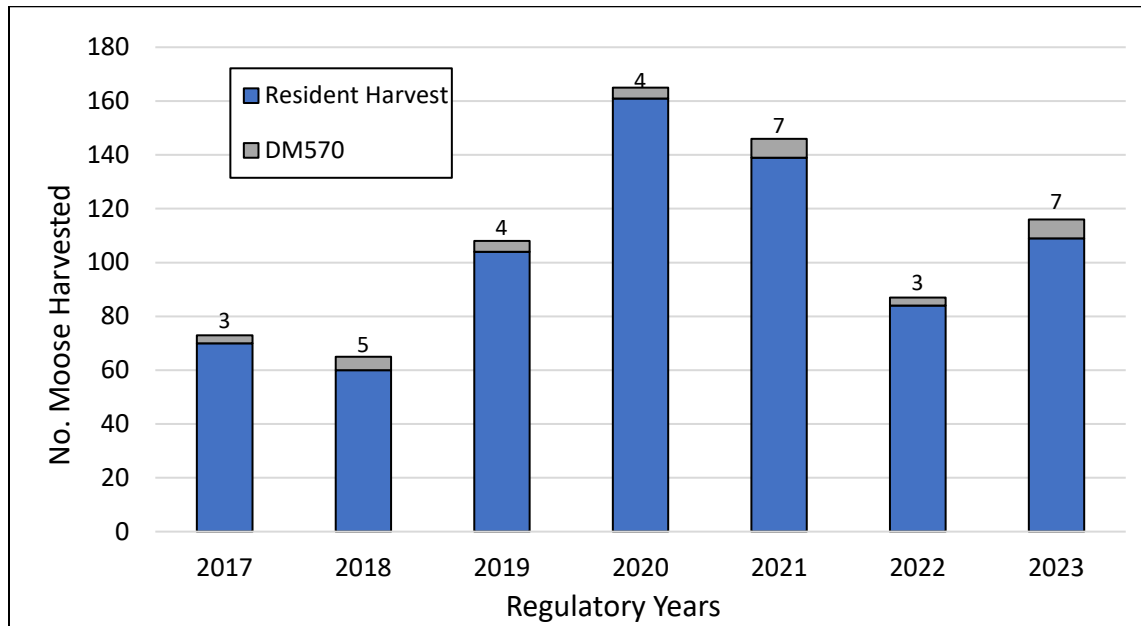


Figure 26-2. Resident and nonresident moose harvest in Unit 17A, regulatory years 2017–2023.

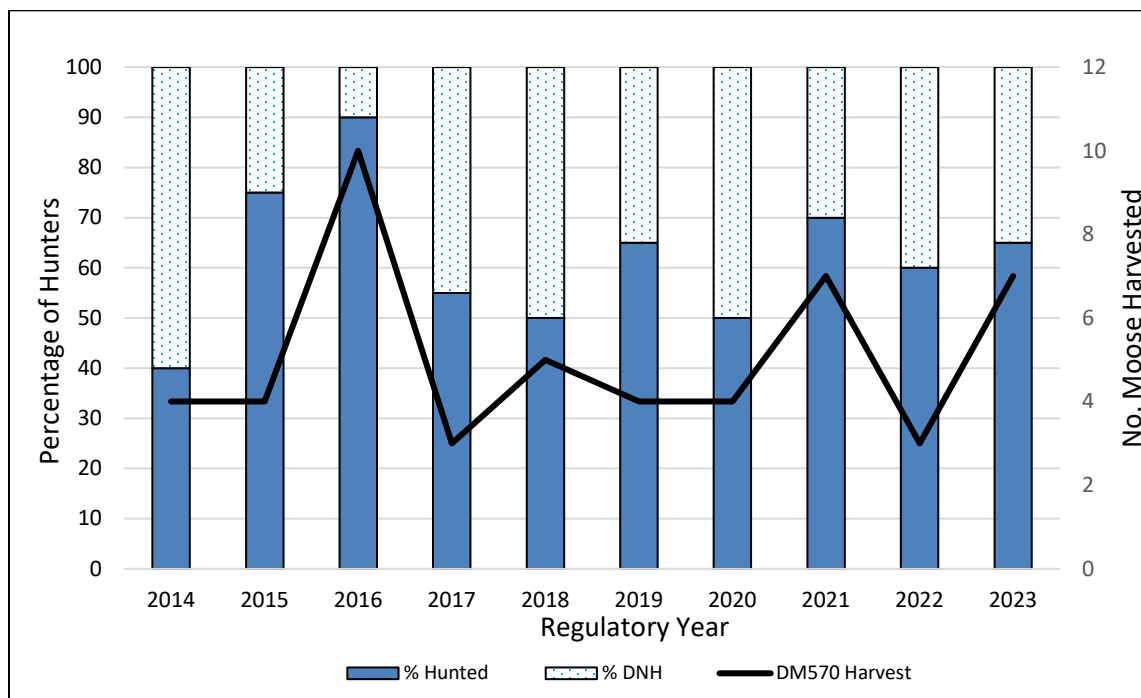


Figure 26-3. Percentage of nonresident hunter participation and those that did not hunt (DNH), and total number of moose harvested under DM570 from regulatory years 2014–2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on extending the nonresident moose hunting season in 17A. Nonresidents may only harvest one bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side which is unlikely to negatively affect the moose population. The population is currently over the management objective. Extending the season may increase nonresident participation and success.

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

PROPOSAL 27 - 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 the Unit 17A antlerless moose hunt allow resident hunters a bag limit of two moose per regulatory year under registration permits, however only 1 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, August 25–September 25;
 - Registration permit (RM571), for resident hunters only with a bag limit of one antlerless moose, August 25–September 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, September 5–15.
- There are two winter hunts, open to resident hunters only, one of which allows for the harvest of antlerless moose.
 - Registration permit (RM575), for resident hunters only with a bag limit of one antlered bull moose, January 1– Last day in February;
 - Registration permit (RM576), for resident hunters only with a bag limit of one antlerless moose, January 1– Last day in February.

Unit 17A has a negative Intensive Management (IM) finding.

There is a positive customary and traditional use (C&T) finding for moose in Unit 17, with an amount reasonably necessary for subsistence (ANS) of 100–150 moose.

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 the population objectives.

BACKGROUND: Moose are relative newcomers to 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 for sightability (1.2) of 2,370 moose, (± 563). The uncorrected estimate was 1,990 moose (± 437). The most recent survey conducted in October of 2022 estimated a total of 2,440 (± 251) with an uncorrected estimate of 1,719 moose (± 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 was originally 800–1,200 moose and was changed to 1,100–1,750 in 2020.

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 seven years of the RM576 antlerless hunt (RY17–RY23), 314 antlerless moose have been taken (241 cows and 73 bulls), for an average of ~35 cows/winter.

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, 8 antlerless moose were harvested, all were cows. From RY17–R23 a total of 30 cows have been harvested during the fall hunt, for an average of 5 cows/year.

During the RY22 BOG cycle, the board set season dates of January 1– Last day in February for both winter hunts to capitalize on variable winter conditions that exist along the southern coast.

From RY17–RY23 a total of 760 moose have been harvested, for an average of ~109 moose/year. The average fall harvest is 51 moose (46 resident harvest, 5 nonresident harvest) and winter harvest averages 58 (77% antlerless, 23% antlered)

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.

PROPOSAL 28 – 5 AAC 92.108. Identified big game prey populations and objectives. Reduce moose population and harvest objectives for Unit 17B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would reduce the Unit 17B moose population objective to 2,800–3,500 moose from 4,900–6,000 and would reduce the harvest objectives to 100–250 moose from 200–400.

WHAT ARE THE CURRENT REGULATIONS? The current population and harvest objectives for moose can be found in 5 AAC 92.108.

Population	Finding	Population Objective	Harvest Objective
GMU 17(A)	Negative		

GMU 17(B)	Positive	4,900 – 6,000	200 – 400
GMU 17(C)	Positive	2,800 – 3,500	165 – 350

The intensive management (IM) population objective for moose in Unit 17B is 4,900–6,000 and the IM harvest objective is 200–400 moose.

There is a positive customary and traditional use (C&T) finding for moose in Unit 17, with an amount reasonably necessary for subsistence (ANS) of 100–150 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Reducing the population and harvest objectives would describe more realistic objectives based on data and knowledge gained since the board established the original objectives; as such, this could allow the objectives to be met in the future.

BACKGROUND: Unit 17B is defined by 2 large river systems, the Nushagak and Mulchatna Rivers that converge near the southern border of Unit 17B and continue south as the Nushagak River. The Wood River Mountains and Neacola Mountains to the Nushagak Hills make up the northern portion of Unit 17B. The remainder of 17B contains large expanses of wet meadow and tundra habitat scattered throughout the unit. The Nushagak and Mulchatna river corridors contain excellent moose habitat. Numerous tributaries to the Nushagak and Mulchatna rivers provide additional riparian habitat that is utilized by moose.

The moose population in Unit 17B was estimated to be 2,500–3,000 moose in 1987 based on extrapolation from a census in the upper Mulchatna area that assumed 50% of Unit 17B is "good moose habitat." Based on this and a desired moose density of 1 moose/mi², the BOG adopted a population objective for Unit 17B of 4,900–6,000 moose. Unit 17B has less than, or a similar amount of moose habitat, as neighboring Unit 17C which is approximately 5,450 mi²; however, 17B has double the population and harvest objectives. Current population objectives for moose in Unit 17B have never been met (Table 28-1). In addition, it is difficult to assess moose abundance in Unit 17B due to its distance from Dillingham, weather, and large survey area.

Table 28-7. Unit 17B moose population estimates, from RY1976–2017.

Year	17B-West	17B-East	Total Estimate
1976	-	1,500	-
1987	-	-	2,500-3,000
2000	1,202	-	-
2001	-	1,953	3,155
2005	1,210	-	-

2008	-	1,466	-
2009	1,137	-	2,603
2017	1,496	-	-

The reported annual harvest for Unit 17B over the last 40 years demonstrates that the current minimum harvest objective has only been achieved in two years (1996 and 2000) (Figure 28-1). The previous high harvests coincided with peak nonresident hunting for Mulchatna Caribou and offered nonresident hunters opportunity for a moose-caribou-bear combination hunt. The current harvest objectives for Unit 17B are not attainable due to lack of resident hunter participation and difficult access for nonlocal and nonresident hunters. The department suggests a new harvest objective for Unit 17B of 100–250 moose, which includes the 40-year average harvest of 121 moose and reflects current harvest levels (Figure 28-1).

After years of high moose harvest between 1995–2000 in Unit 17B (Figure 28-2), harvest began to decline in 2003 (Figure 28-1). Unit 17C moose harvest also declined through 2018. The declines prompted the department to investigate cause(s) and an IM feasibility assessment to benefit moose which was completed in 2020. The conclusion of the feasibility assessment was that it was not a practical approach given the widespread nature of moose

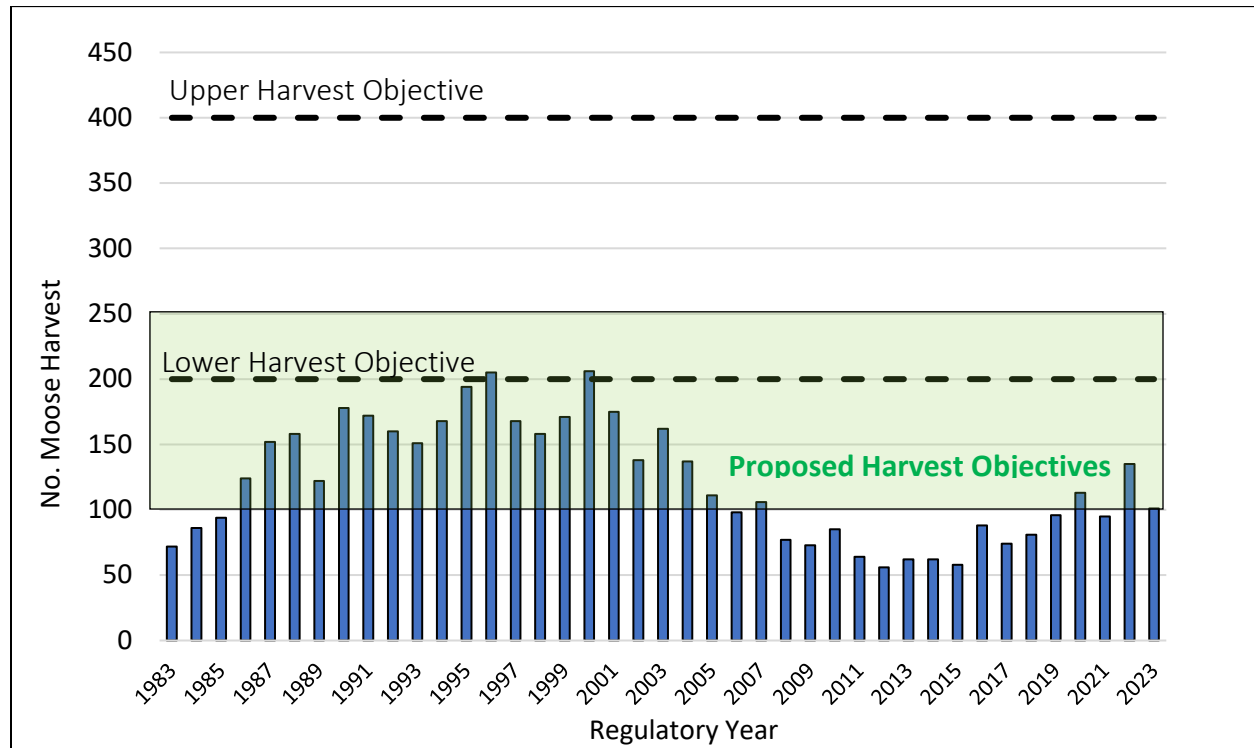
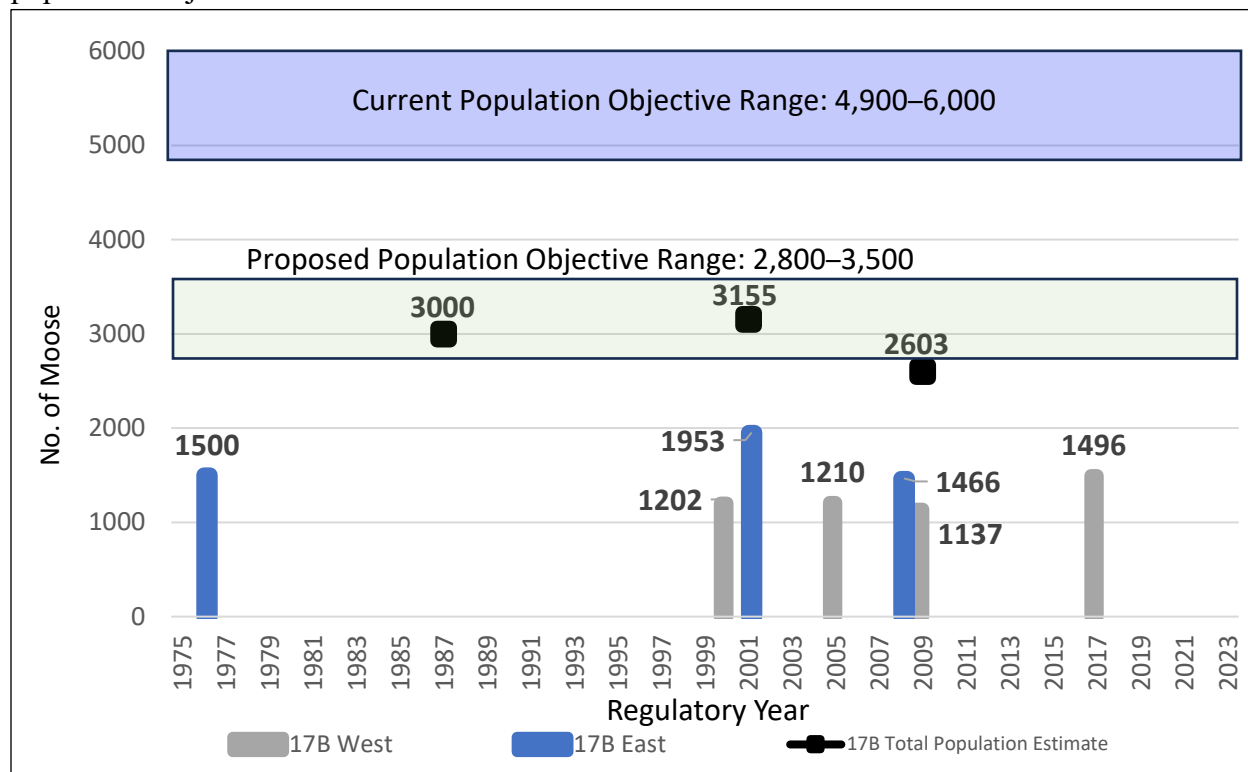


Figure 28-1. Harvest in Unit 17B from RY1983–2023 and the current and proposed harvest objectives.

Figure 28-2. Population estimates in Unit 17B from RY1983–2023 and the current and proposed population objectives.



calving, and limited tools to reduce bear abundance over a large geographic area. During the time of the feasibility assessment, the Unit 17B population was unknown but assumed under objective while the Unit 17C population estimate was determined to be within objectives. Reducing the Unit 17B moose population objective to 2,800–3,500 will put it close to the original Unit 17B-wide estimate of 2,500–3,000 moose in 1987 and the combined population surveys from between 2001–2017.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** decreasing the Unit 17B moose population and harvest objectives. The current population objective is unrealistic given the estimated moose habitat and desired density of moose. Similarly, the current harvest objective is unattainable given the lack of resident hunter participation in Unit 17B and difficult access for nonlocal and nonresident hunters. Harvest objectives have been met twice in 40 years and surpassed the lower bound of the harvest objective (200 moose) by 4 and 5 moose respectively in 1996 and 2001. Adjusting management objectives is appropriate due to current and historic data that determine current goals are unlikely to ever be met and have no history of being met.

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

PROPOSAL 29 - 5 AAC 92.108 Identified big game prey populations and objectives. Review population and harvest objectives for the Mulchatna caribou herd.

PROPOSED BY: Patrick Walsh

WHAT WOULD THE PROPOSAL DO? The proposal would evaluate and re-establish population and harvest objectives after a habitat assessment and associated analyses have been performed to define the current ecological potential of the range to support caribou.

WHAT ARE THE CURRENT REGULATIONS?

Hunting the Mulchatna Caribou Herd (MCH) is administered through a resident-only registration caribou permit (RC503) across the full historic range of the herd. All state and federal caribou hunting seasons are currently closed.

The intensive management (IM) population objective for the MCH is 30,000–80,000 and the harvest objective is 2,400–8,000 caribou.

There is a positive customary and traditional use (C&T) finding for the MCH in Units 9A, 9B, 17, 18, 19A (that portion south of the Kuskokwim River), and 19B with an amount reasonably necessary for subsistence (ANS) of 2,100–2,400 caribou for the herd.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the board adopts a lower population and harvest objective, the Intensive Management Plan for Mulchatna Caribou will need to be updated with this new information in addition to changes in 5 AAC 92.108. New harvest and population objectives would not affect the C&T determination or ANS for the MCH.

BACKGROUND: The population of the MCH has fluctuated widely since monitoring began. The original population objective of 25,000 caribou was established in 1987 by the Board of Game (BOG) and has been adjusted over time commensurate with population variability until the current objective of 30,000–80,000 was defined in 2008. At that time, the MCH was believed to number approximately 30,000 animals.

The first widespread population surveys began in 1974 and the population peaked in 1996 at an estimated 200,000 caribou; a low of 7,500 caribou was documented in 1978. The average number of MCH caribou prior to their peak in 1996 across eleven survey periods was 64,372. The post-peak average over 17 surveys from 1999 through 2024 averages 41,033. Both of these averages

fall within the current population objective range (Table 29-1). In retrospect, the 2008 MCH population objective has been achieved in three of the last 19 survey years. The current midpoint of the population objective of 55,000 caribou has been achieved in 9 survey years out of 28 total estimates going back 46 years, but is heavily skewed lower due to annual surveys in recent years contributing to a decreased average.

The MCH remains less than half of the lower population objective with relatively stable estimates of 12,500–13,500 since 2019. Surveys in 2024 indicated a slight increase in herd abundance of 14,498 caribou (Figure 29-1).

Table 29-1. Mulchatna caribou herd population and harvest history, RY2006–2024.

Calendar Year	Minimum Count ^a	Extrapolated Estimate ^b
2006	40,766	45,000
2008	20,545	30,000
2012	15,443	22,809
2013	12,660	18,308
2014	-	26,275
2015	-	30,736
2016	14,780	27,242
2017	13,350	-
2018	11,084	-
2019	9,294	13,448
2020	8,782	13,448
2021	9,933	12,837
2022	9,710	12,112
2023	10,144	12,507
2024	12,816	14,498

^a Data derived from photo-counts and observations during the aerial census.

^b Estimate based on observations during census/surveys and subjective estimates of the number of caribou in areas not surveyed.

The BOG established the current harvest objective for the MCH of 2,400–8,000 animals in 2008. The last time reported harvest exceeded the minimum harvest objective of 2,400 caribou was in 2003. Average harvest since 2006 is 318 caribou per year and the (Figure 29-2).

Currently the MCH is fragmented into at least 4 segments, possibly more. These various segments range in abundance estimates from a low of 650 in Unit 18 near Goodnews to a high of 7,000 in West-MCH (WMCH) range. There currently is an active predation control program focused on removing bears and wolves on the WMCH portion's calving grounds for the benefit of caribou calves. There is also a longstanding public same day airborne wolf control program which encompasses portions of Units 9B, 17B, 17C, 18 and 19B; however, public participation has been

low for a number of reasons including poor snow conditions and the remoteness of the area. The control area was expanded in 2022 to include the primary wintering grounds of the East-MCH (EMCH) range, and the calving grounds of both EMCH and WMCH.

Current department research has shed new light on both disease and nutrition and their implications on caribou vital rates. Pregnancy rates measured with an ultrasound are very high (>90%), and births of viable calves were high in the WMCH, but due to weather the EMCH did not have the same frequency of surveillance.

Figure 29-1. Historic and current range of the Mulchatna caribou herd across Units 9A, 9B, 9C, 17, 18 and 19A, and 19B.

objective of 30,000 to open a hunt is not recommended due to the potential for irruptive growth. Limited fall bull hunts and winter any caribou hunts may be warranted to help manage the population within the objective range.

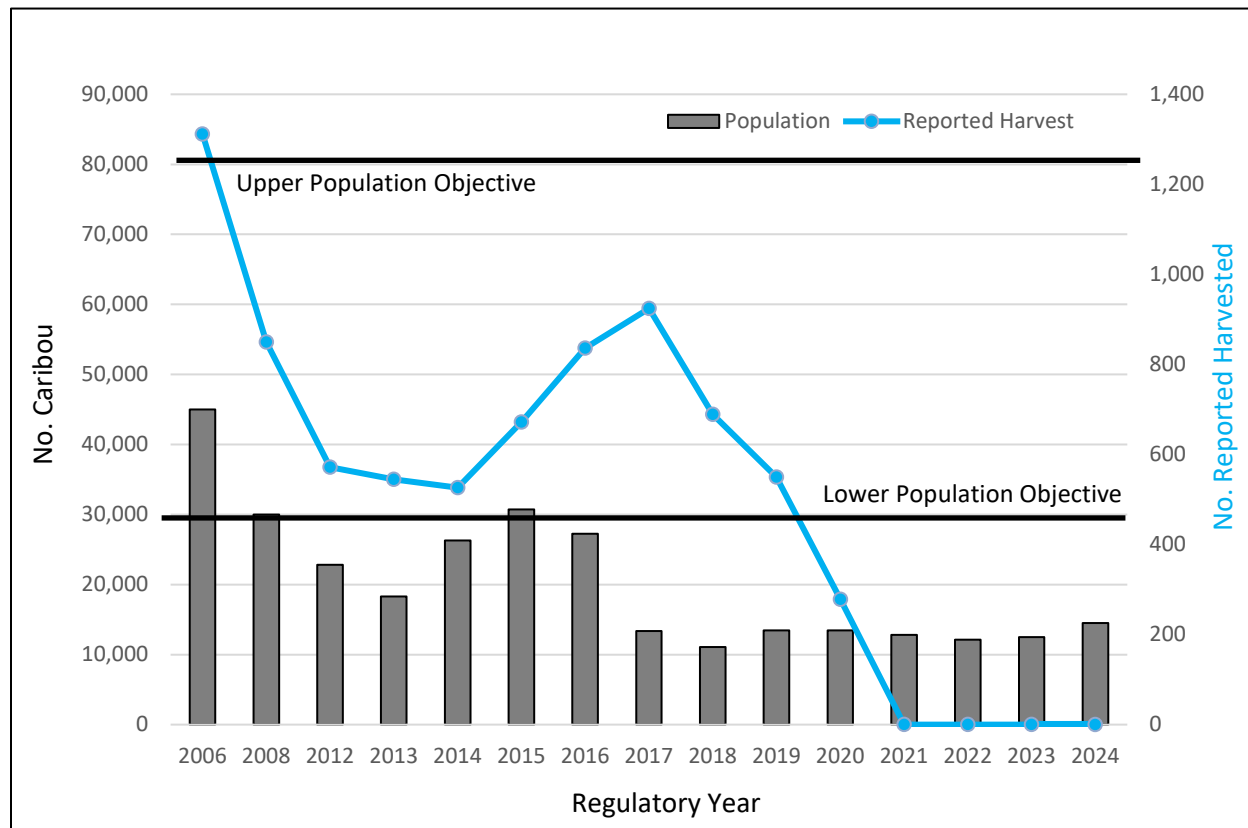


Figure 29-2. Mulchatna caribou herd population and harvest history, RY2014–2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. MCH populations have varied widely over the last century; the population is currently at half of the minimum objective across the range of MCH and the department believes the range can support at least 30,000 caribou. A number of factors contribute to the current low population level. Although the 2024 population estimate is the highest since regulatory year 2017, it would be ideal to see the current positive growth rate continue. The department intends to continue intensive monitoring of the MCH for the foreseeable future. Department led bear removal efforts have likely contributed to bolstered calf survival in the WMCH as documented in the highest fall calf:cow composition surveys since their inception. Current community conservation efforts are applauded as minimal out of season take has been documented in recent years (2023 and 2024). The department recommends no changes to current objectives until predator control operations are concluded and enough time has elapsed to both determine program success and to detect continued positive herd growth.

The board can adjust population and harvest objectives; however, it cannot instruct the department to conduct specific research projects and has no administrative authority over the department.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department in the form of habitat assessment work.

PROPOSAL 30 – 5AAC 85.025. Hunting seasons and bag limits for Caribou. Implement a 3-year moratorium on caribou hunting in Units 9B, 17, and 19A&B.

PROPOSED BY: Alissa Nadine Rogers

WHAT WOULD THE PROPOSAL DO? The proposal would close all caribou hunting in regulation by creating a 3-year hunt moratorium on caribou in Units 9B, 17, and 19A&B – primarily the Mulchatna Caribou Herd (MCH).

WHAT ARE THE CURRENT REGULATIONS? The current caribou hunting regulations can be found in 5 AAC 85.025 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Unit 9(B)		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Remainder Unit 17(A)		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Unit 17(B), that portion in		

The Unit 17(B) Nonresident
Closed Area

RESIDENT HUNTERS: Aug 1. – Mar. 31
2 caribou by registration
Permit only

NONRESIDENT HUNTERS: No open season

Remainder of **Unit 17(B)**,
And that portion of **Unit**
17(C) east of the east
Banks of the Wood River,
Lake Aleknagik, Agulowak
River, Lake Nerka, and the
Agulupak River

RESIDENT HUNTERS: Aug 1. – Mar. 31
2 caribou by registration
Permit only

NONRESIDENT HUNTERS: No open season

Units **19(A)**, **19(B)**, and
19(E) within the Nonresi-
dent Closed Area

RESIDENT HUNTERS: Aug 1. – Mar. 15
2 caribou by registration
Permit only

NONRESIDENT HUNTERS: No open season

Remainder of Units **19(A)**,
19(B), and 19(E)

RESIDENT HUNTERS: Aug 1. – Mar. 15
2 caribou by registration
Permit only

NONRESIDENT HUNTERS:

No open season

....

The intensive management (IM) population objective for the Mulchatna Caribou Herd (MCH) is 30,000–80,000 and the harvest objective is 2,400–8,000 caribou.

There is a positive customary and traditional use (C&T) finding for caribou in Units 9A, 9B, 17, 18, 19A, and 19B with an amount reasonably necessary for subsistence (ANS) of 2,100–2,400 caribou.

Hunting of the MCH is administered through a resident-only registration caribou permit (RC503) across the full historic range which allows for up to 2 caribou by registration permit only August 1–March 15 (5 AAC 85.025). Nonresident opportunity has not been provided since 2008.

During its January 2024 meeting, the BOG adopted a 4-year moratorium across Unit 18 subsequently approving a request from the public to entirely close the RC503 season in a concerted conservation effort agreed upon by the public and BOG.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would close the caribou season in Units 9B, 17, and 19A&B for a minimum of three years by regulation. The department has closed the season by Emergency Order (EO) for all the MCH range for the past three years. For several years before that, the season had been shortened due to conservation concerns. This would align the regulation with the recently passed 3-year MCH moratorium for Unit 18.

BACKGROUND: The population and spatial use of the Mulchatna Caribou Herd has fluctuated widely since monitoring began (Figure 30-1). The original population objective of 25,000 caribou was established in 1987 by the BOG and has been adjusted over time commensurate with population variability until the current intensive management population objective of 30,000–80,000 was defined in 2008. At that time, the MCH was believed to number approximately 30,000 animals.

The population registered a low of 7,500 animals in 1974 and peaked at an estimated 200,000 caribou in 1996. The average of survey estimates from 1974-1996 was 58,512 animals but weighted heavily by the peak years in the late 1990s. Since the updated intensive management objectives established in 2008, the MCH population lower objective has only been achieved twice, in 2008 and 2015. The current midpoint of the objective of 55,000 caribou has been achieved 9 survey years out of 24 total estimates going back 46 years, with the most recent mid-point objective being met in 2004. The MCH remains under the population objective with consistent estimates from 2019 through 2023 of 12,000–13,000 caribou with overlapping confidence intervals,

suggesting that the last five years have remained relatively stable, and slight growth observed in 2024 (~14,500) (Tables 30-1, Figure 30-2).

Table 30-1. Mulchatna caribou herd population and harvest history, RY2006–2024.

Calendar Year	Minimum Count ^a	Extrapolated Estimate ^b
2006	40,766	45,000
2008	20,545	30,000
2012	15,443	22,809
2013	12,660	18,308
2014	-	26,275
2015	-	30,736
2016	14,780	27,242
2017	13,350	-
2018	11,084	-
2019	9,294	13,448
2020	8,782	13,448
2021	9,933	12,837
2022	9,710	12,112
2023	10,144	12,507
2024	12,816	14,498

^a Data derived from photo-counts and observations during the aerial census.

^b Estimate based on observations during census/surveys and subjective estimates of the number of caribou in areas not surveyed.

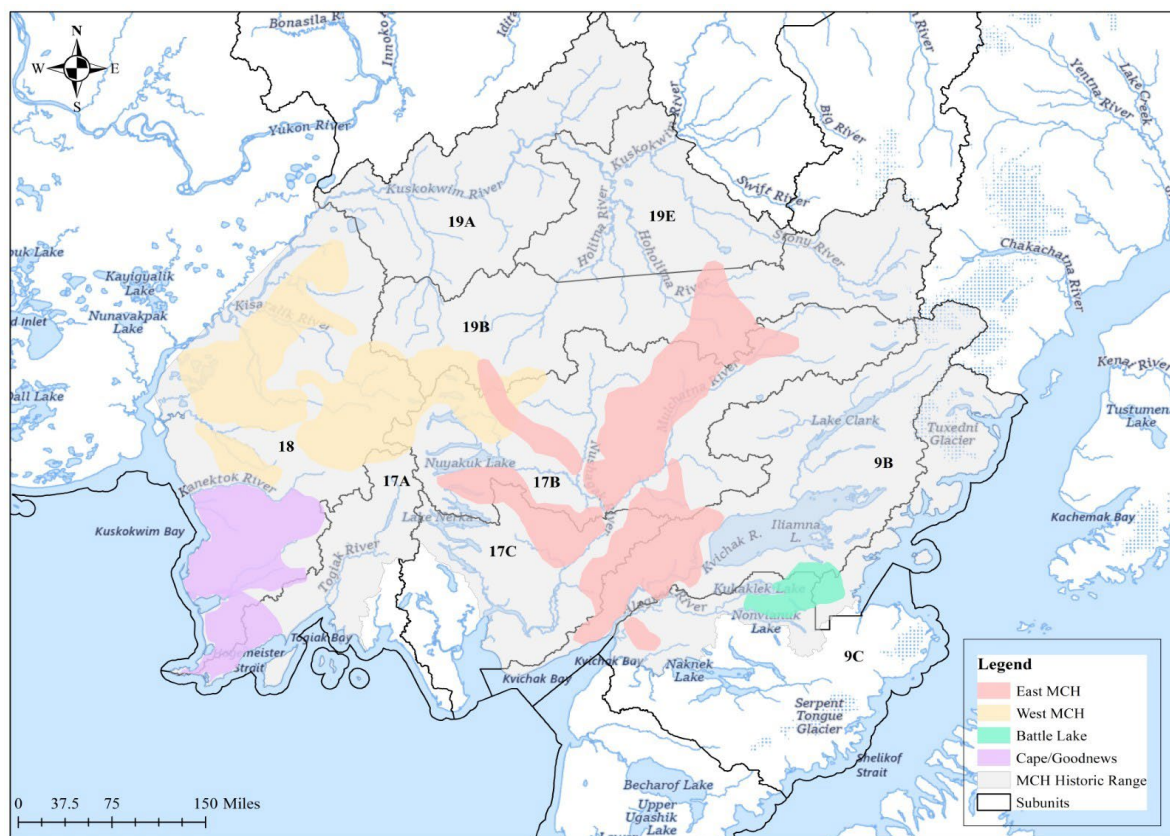


Figure 30-1. Historic and current range of the Mulchatna caribou herd across Units 9A, 9B, 9C, 17, 18 and 19A&B.

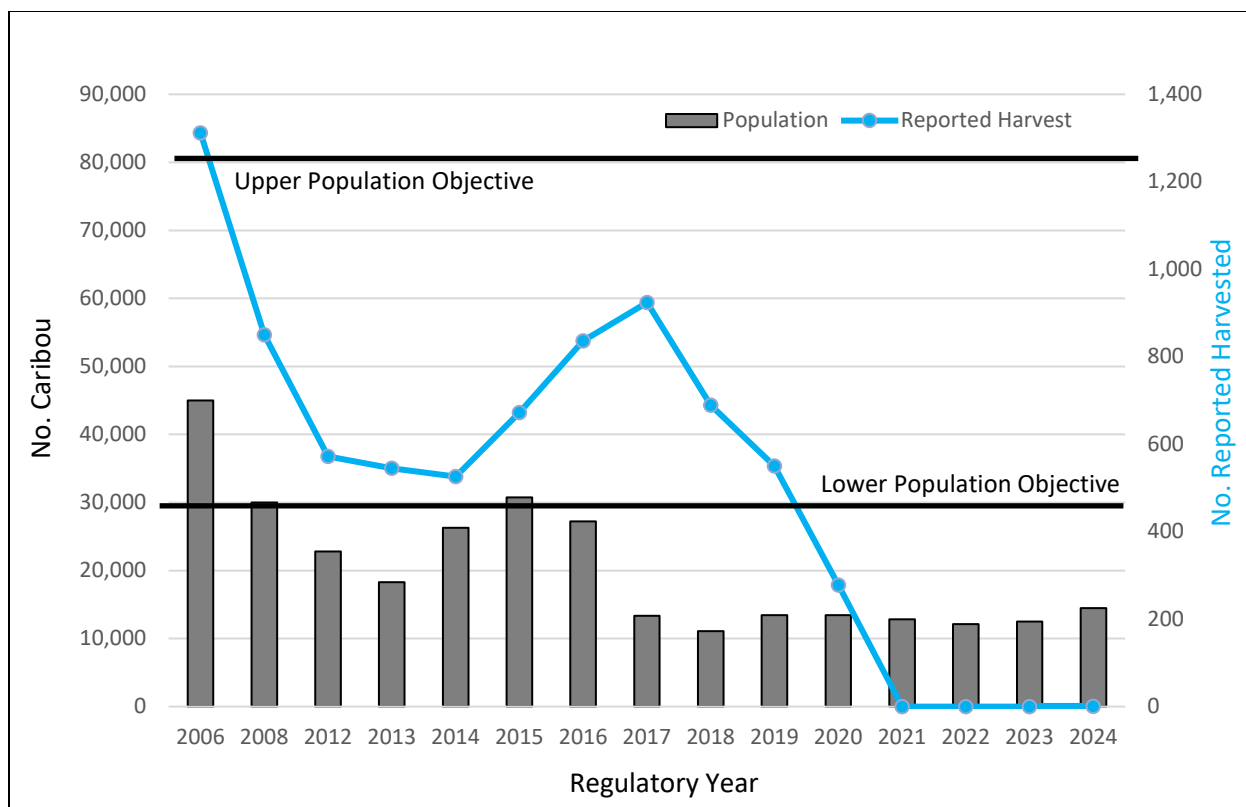


Figure 30-2. Mulchatna caribou herd population and harvest history, RY06–24.

There is an active predator control program for the MCH focused on removing wolves and bears to increase caribou calf survival. It currently involves both a public and department led effort. The public effort is targeted at removing wolves across the east MCH seasonal ranges by same-day-airborne, aerial gunning methods by permitted members of the public in Units 9B, 17B, 17C, 18, and 19B. The active department removal is centered around the west MCH calving grounds in Unit 18 on State lands. In two years of department removal a total of 175 brown bears, 5 black bears, and 19 wolves have been removed. Calf-to-cow ratios increased in October of 2023, and both population estimates and minimum counts in summers of 2023 and 2024 have increased.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it has the authority to keep the hunts closed while the herd rebounds and plans to do so. The department supports consistency in the regulations to keep regulatory complexity to a minimum. This would align regulations across the range of MCH after adoption of a 4-year moratorium in Unit 18 at the 2024 Arctic/Western Region BOG meeting in Kotzebue. If adopted, the board will need to determine how a moratorium will impact reasonable opportunity for subsistence uses of caribou.

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

PROPOSAL 31 – 5 AAC 85.025. Seasons and bag limits for caribou. Change the resident open season for caribou to no open season in Units 9, 17, and 19.

PROPOSED BY: Alissa Nadine Rogers

WHAT WOULD THE PROPOSAL DO? The proposal would close the resident caribou season in Units 9B, 17, and 19A & 19B for the Mulchatna caribou herd.

WHAT ARE THE CURRENT REGULATIONS? The current caribou hunting regulations can be found in 5 AAC 85.025 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Unit 9(B)		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Remainder Unit 17(A)		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Unit 17(B), that portion in The Unit 17(B) Nonresident Closed Area		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Remainder of Unit 17(B), And that portion of Unit 17(C) east of the east Banks of the Wood River, Lake Aleknagik, Agulowak		

River, Lake Nerka, and the
Agulupak River

RESIDENT HUNTERS: Aug 1. – Mar. 31
2 caribou by registration
Permit only

NONRESIDENT HUNTERS: No open season

Units 19(A), 19(B), and
19(E) within the Nonresi-
dent Closed Area

RESIDENT HUNTERS: Aug 1. – Mar. 15
2 caribou by registration
Permit only

NONRESIDENT HUNTERS: No open season

Remainder of Units 19(A),
19(B), and 19(E)

RESIDENT HUNTERS: Aug 1. – Mar. 15
2 caribou by registration
Permit only

NONRESIDENT HUNTERS: No open season
....

The intensive management (IM) population objective for the Mulchatna Caribou Herd (MCH) is 30,000–80,000 and the harvest objective is 2,400–8,000 caribou.

There is a positive customary and traditional use (C&T) finding for caribou in Units 9A, 9B, 17, 18, 19A, and 19B with an amount reasonably necessary for subsistence (ANS) of 2,100–2,400 caribou.

Hunting of the MCH is administered through a resident-only registration caribou permit (RC503) across the full historic range which allows for up to 2 caribou by registration permit only August 1–March 31 (5 AAC 85.025). Nonresident opportunity has not been provided since 2008.

During its January 2024 meeting, the BOG adopted a 4-year moratorium across Unit 18 subsequently approving a request from the public to entirely close the RC503 season in a concerted conservation effort agreed upon by the public and BOG.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would close the state caribou season in Units 9B, 17, 18 and 19A&B (Figure 31-1) by regulation. The department has closed the season by EO for all the MCH range for the past 3 years and for several years before that the season had been shortened due to conservation concerns. This would align the season with the recently passed 4-year moratorium for Unit 18.

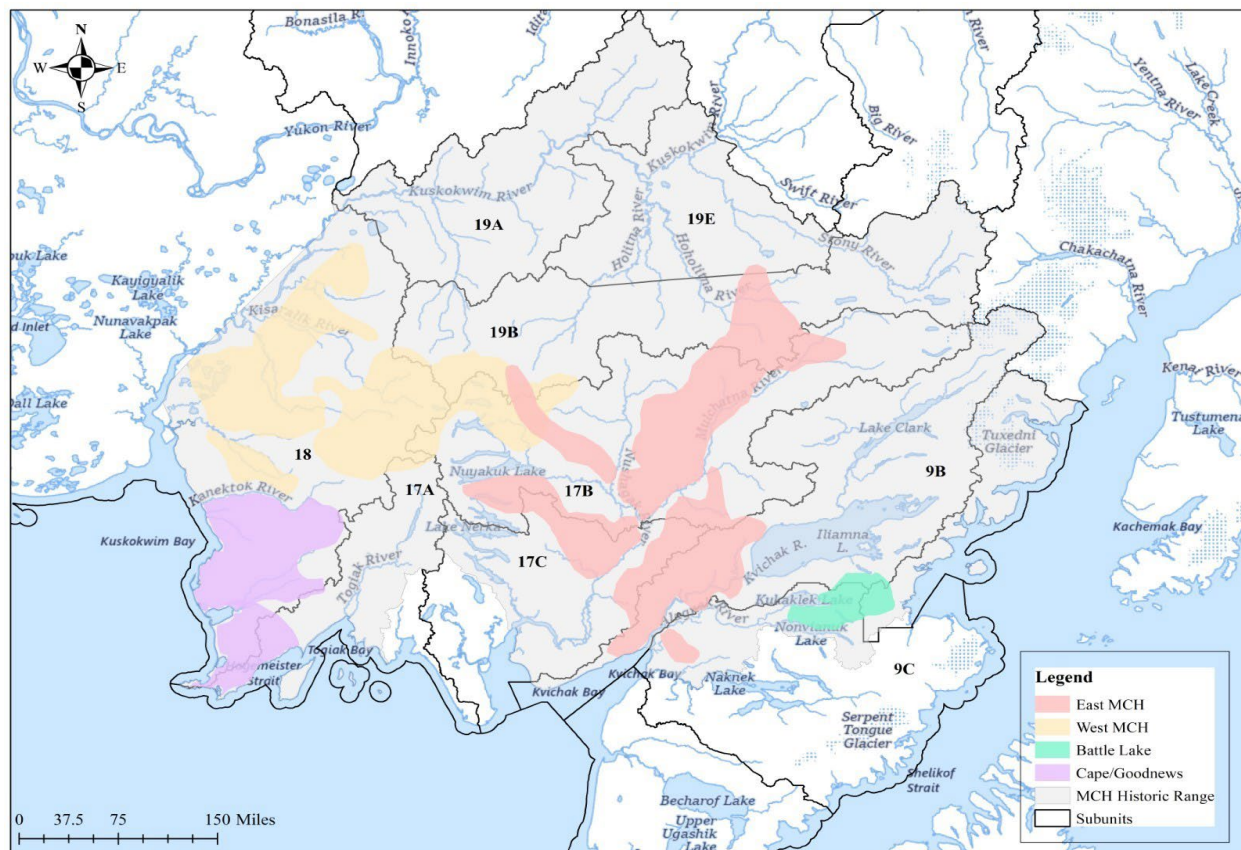


Figure 31-1. Historic and current range of the Mulchatna caribou herd across Units 9A, 9B, 9C, 17, 18 and 19A&B.

BACKGROUND: The population of the Mulchatna Caribou Herd has fluctuated widely since monitoring began. The original population objective of 25,000 caribou was established in 1987 by the BOG and has been adjusted over time commensurate with population variability until the current objective of 30,000–80,000 was defined in 2008. At that time, the MCH was believed to number approximately 30,000 animals.

The population registered a low of 7,500 animals in 1974 and peaked at an estimated 200,000 caribou in 1996. The average of survey estimates from 1974–1996 during this period is 58,512 animals but weighted heavily by the peak years in the late 1990s (Table 31-1). Since the updated intensive management objectives established in 2008, the MCH population lower objective has only been achieved twice, in 2008 and 2015. The current midpoint of the objective of 55,000 caribou has been achieved 9 survey years out of 24 total estimates going back 46 years, with the

most recent mid-point objective being met in 2004. The MCH remains under the population objective with consistent estimates from 2019 through 2023 of 12,000–13,000 caribou with overlapping confidence intervals, suggesting that the last five years have remained relatively stable.

Table 31-1. Mulchatna caribou herd population and harvest history, RY06–24.

Calendar Year	Minimum Count ^a	Extrapolated Estimate ^b
2006	40,766	45,000
2008	20,545	30,000
2012	15,443	22,809
2013	12,660	18,308
2014	-	26,275
2015	-	30,736
2016	14,780	27,242
2017	13,350	-
2018	11,084	-
2019	9,294	13,448
2020	8,782	13,448
2021	9,933	12,837
2022	9,710	12,112
2023	10,144	12,507
2024	12,816	14,498

^a Data derived from photo-counts and observations during the aerial census.

^b Estimate based on observations during census/surveys and subjective estimates of the number of caribou in areas not surveyed.

There is an active predation control program for the MCH focused on removing wolves and bears for the benefit of caribou. It currently involves both a public and department led effort. The public effort is targeted at removing wolves across the east MCH seasonal ranges by same-day-airborne, aerial gunning methods by permitted members of the public in Units 9B, 17B, 17C, 18, and 19B. The active department removal is centered around the west MCH calving grounds in Unit 18 on State lands. In two years of department removal a total of 175 brown bears, 5 black bears, and 19 wolves have been removed. Calf-to-cow ratios increased in October of 2023, and both population estimates and minimum counts in summers of 2023 and 2024 have increased.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it has the authority to keep the hunts closed while the herd rebounds and plans to do so. The department supports consistency in the regulations to keep regulatory complexity to a minimum. Hunting of the MCH under RC503 has been closed by Emergency Order for the last three years and is not expected to occur until a sizable harvestable surplus is determined. A 4-year moratorium across Unit 18 was approved by the Board in 2024, and a request from the public for a moratorium for another three years across Units 9B, 17, and 19A, and 19B aligning regulations

across the entire range of MCH is in front of the board at this meeting (Proposal 30). The predation control program is approved through 2028, and it is recommended hunting should be avoided while the department conducts a lethal predator removal program. If this proposal is adopted, the board should consider how the closure will impact reasonable opportunity for subsistence uses.

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

Proposal 32 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Allow the year-round take of brown bear in Unit 17.

PROPOSED BY: Dan Dunaway

WHAT WOULD THE PROPOSAL DO? The proposal will change the general and subsistence brown bear season from August 20 – May 31 to no closed season for brown bears for residents and nonresidents in Unit 17.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Unit 17		
2 bears every regulatory year by registration permit only	Aug. 20 – May 31.	No open season
2 bears every regulatory year	Aug. 20 – May 31	Aug. 20 – May 31
....		

Both residents and nonresidents can take 2 bears every regulatory year between August 20 – May 31. No resident locking tag is required. All bears harvested in the general hunt and all bears intended for sale must be sealed. Bears harvested in the resident-only subsistence registration hunt (RB500) need only be sealed if removed from the unit.

Under 5 AAC 92.200 the skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year (RY) can be sold under the conditions of a permit issued by the department.

There is a positive customary and traditional use (C&T) finding for brown bears in Unit 17(A) and Unit 17(B), that portion draining into the Nuyakuk and Tikchik Lake, with an amount reasonably necessary for subsistence (ANS) of 5 bears. There is also a positive C&T finding for brown bears in Unit 17B that portion not draining into the Nuyakuk and Tikchik Lake, Unit 17C, Units 19(A) and 19(B) upstream of and excluding the Aniak River drainage, and Unit 19(D) with an ANS of 10–15 brown bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Through the liberalization of the Unit 17 brown bear hunting season for residents and nonresidents there may be a small increase in brown bear harvest and increased reporting efforts from those that view defense of life or property (DLP) as a hindrance rather than a legal means to address nuisance bears. If this regulation passes it is unlikely to be utilized by guides, as most nonresidents interested in bears as a stand-alone hunt pursue them in the spring when hide quality is best, or during a combination hunt in the fall for moose and brown bears.

BACKGROUND: Brown bears are found throughout Unit 17, from the coastal waters of Bristol Bay, the riparian areas of the Wood-Tikchik Mountains, to the Nushagak and Mulchatna rivers. A brown bear abundance survey was conducted in 2003 and 2004 by United States Fish and Wildlife Service using aerial survey transects in an 8,281 mi² area in Togiak National Wildlife Refuge primarily in Unit 17A, portions of 17C and 18, yielding an estimated 103 bears per 1,000 mi². Units 17B and 17C are more productive than 17A with more moose, caribou, and salmon as food resources for brown bears, and thus it is plausible they support similar densities to 17A. From RY11–23 the average number of hunters who took two bears was 5 hunters per year (range 0–13) which comprised of 0–9% of the annual harvest.

During RY70–RY97, annual reported harvests rarely exceeded 50 bears per year. Since 1997, annual reported bear harvests have increased substantially. In RY11 the bag limit for brown bears in Unit 17 increased from 1 to 2 bears per regulatory year, an extended season from Aug. 20–May 31, and eliminated the locking tag for residents, which is a likely cause for the short-term spike in harvest. In RY16 the sale of brown bear hides with claws attached and skulls of legally taken brown bears harvest in areas with a two brown bear bag limit was allowed. (Figure 32-1). Effective RY18 a permit was required at the time of sealing before the skulls and hides with claws attached could be sold and required the hides be permanently marked.

Management objectives for brown bears in Unit 17 include maintaining a brown bear population that will sustain an annual harvest of 50 bears composed of at least 50% males. This harvest objective has been exceeded twice in the last thirteen years (RY 2018 and 2021, Figure 32-1) Harvest has exceeded 50 bears from RY11–RY23, with a low of 51 harvested bears in RY16, but appears to be on an increasing trend (Figure 32-2).

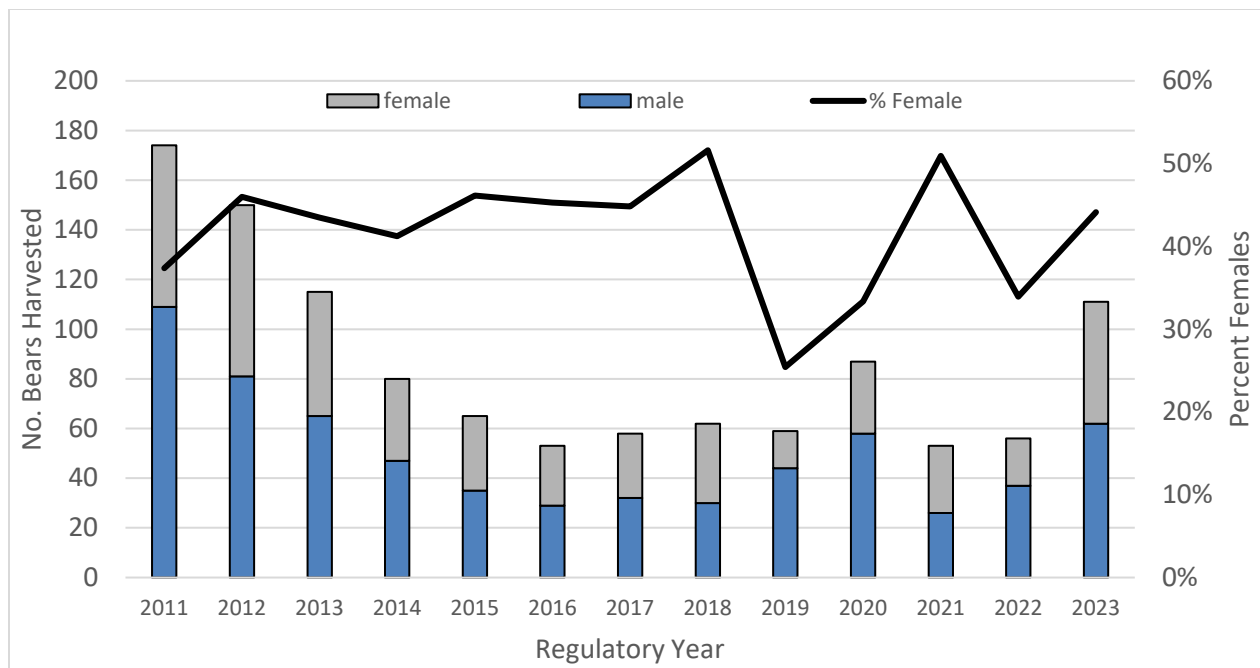


Figure 32-1. Brown bear harvest by sex in Unit 17 during regulatory years 2011 – 2023.

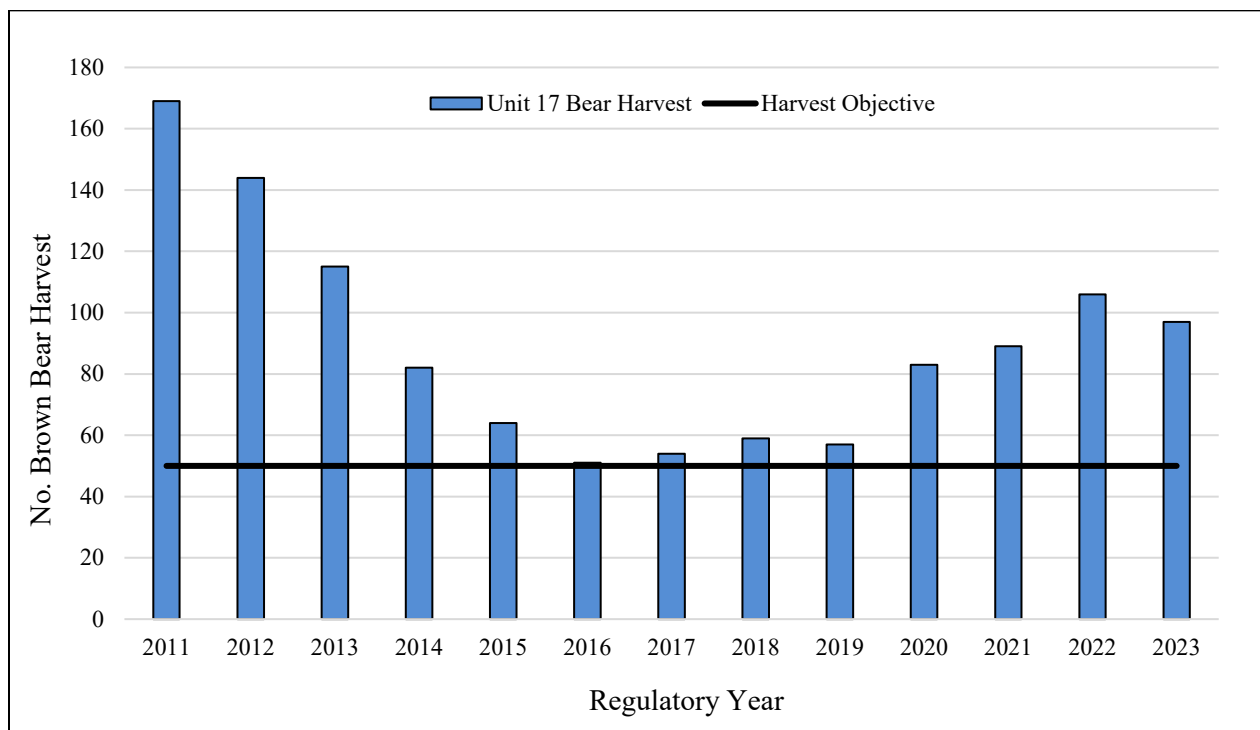


Figure 32-2. Brown Bear harvest in Unit 17 regulatory years 2011–2023. Does not include department removal in 2023.

Brown bears remain a source of conflict for local residents while at remote camps. Many human-bear conflicts result in DLP kills or shot and left bears and are rarely reported. The handful of bears

killed in DLP are instances during June and July when residents are typically out fishing or berry picking but the resident bear season is closed. Between RY11–RY23 Unit 17 had 17 reported bears removed through DLP, and in RY22 9 bears were shot, not salvaged, and reported from the public to Department staff in Dillingham. Reported DLP's in that time primarily occurred in late August (Figure 32-2) after the hunting season was open, but also occurred in May, June, July, and September. Reported harvest reflects only a portion of the brown bears harvested in Unit 17, as each year reports of shot and left bears reach AWT and ADFG. Several individuals have expressed their frustration at having to salvage the hide and skull only to surrender it to the State, and that they would prefer to see a year-round resident season that would allow for legal harvest of bears during this time of increased subsistence activity. If adopted, this proposal is applicable to both the general season and subsistence permit hunt (RB500) in Unit 17.

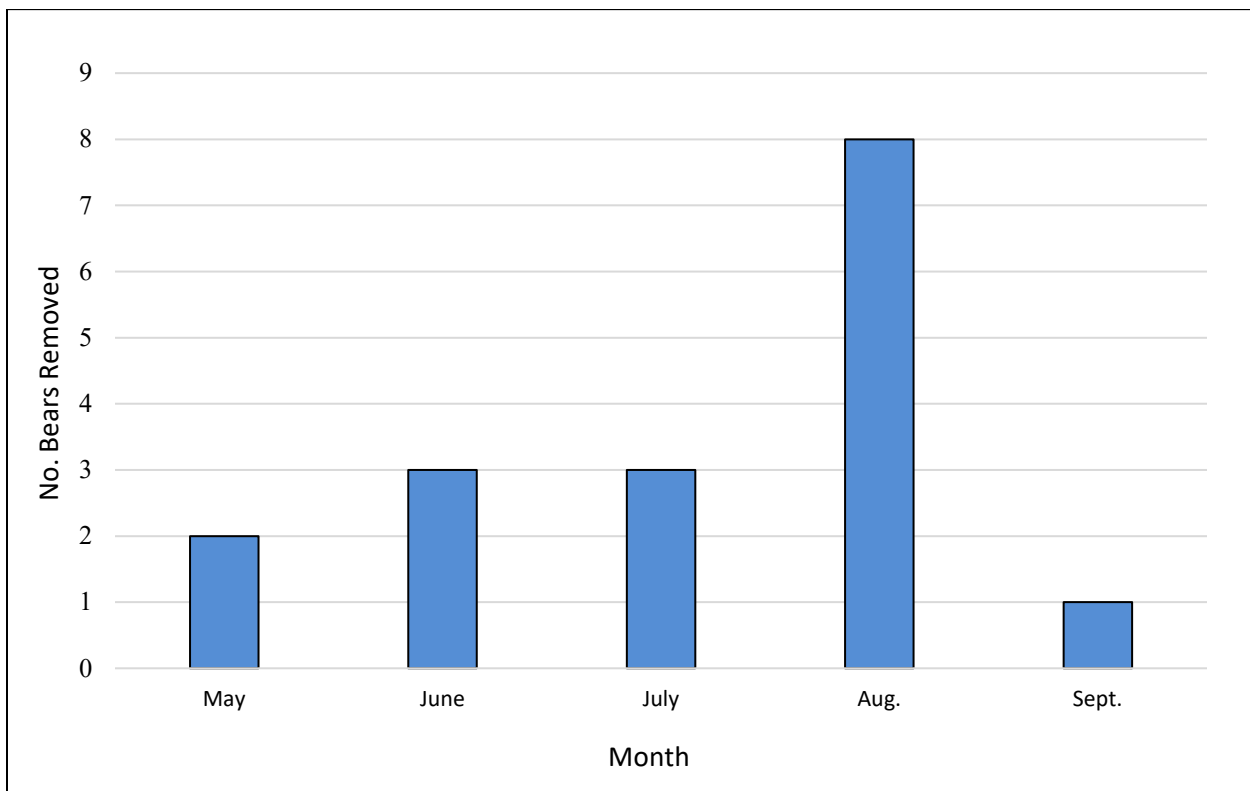


Figure 32-3. Chronology of brown bears removed through defense of life and property in Unit 17, regulatory years 2011–2023.

DEPARTMENT COMMENTS: The department **SUPPORTS** a year-round season for brown bears in Unit 17. Public harvest has been on an increasing trend since RY16, after a previous decline from RY11 when harvest peaked in Unit 17. The harvest objective has been exceeded the past 12 years; however, there has been no indication of a conservation concern. Extending the season will also give residents the opportunity to harvest bears that would otherwise be taken under DLP during June–July. The department will also monitor any increase in harvest for potential conservation concerns. Cubs and sows with cubs cannot be taken, which helps to provide recruitment into the population and prevent concerns of unsustainable harvest.

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

PROPOSAL 33 – 5 AAC 92.085 (8) Unlawful methods of taking big game; exceptions. Allow the take of brown bear and wolves in Unit 17 the same day the hunter has flown.

PROPOSED BY: Dennis Williams

WHAT WOULD THE PROPOSAL DO? This proposal would allow the harvest of brown bears and wolves the same day as being airborne in Unit 17.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Open Season (Subsistence and Units and Bag Limits, General Hunts)	Resident	Nonresident
...		
Unit 17		
2 bears every regulatory year by registration permit only	Aug. 20 – May 31	No open season.
2 bears every regulatory year	Aug. 20 – May 31	Aug. 20 – May 31
....		

The current wolf hunting regulations can be found in 5 AAC 85.056 and in the *2024–2025 Alaska Hunting Regulations*.

Open Season (Subsistence and Units and Bag Limits, General Hunts)	Resident	Nonresident
...		
10 wolves per day Unit 17	Aug. 10 – Apr. 30	Aug. 10 – Apr. 30
....		

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, ...

....

There is a positive customary and traditional use (C&T) finding for brown bears in Unit 17(A) and Unit 17(B), that portion draining into the Nuyakuk and Tikchik Lake, with an amount reasonably necessary for subsistence (ANS) of 5 bears. There is also a positive C&T finding for brown bears in Unit 17B that portion not draining into the Nuyakuk and Tikchik Lake, Unit 17C, Units 19(A) and 19(B) upstream of and excluding the Aniak River drainage, and Unit 19(D) with an ANS of 10–15 brown bears. There is a positive C&T finding for wolves in Unit 17 with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal will allow same day airborne (SDA) take of wolves and brown bears. Taking wolves the same day a person has been airborne is only allowed under the conditions of a permit as part of an intensive management (IM) program. If adopted this proposal would also allow bear hunters to hunt brown bears the same day they have flown in Unit 17. This specifically allows the practice of spotting brown bears from the air and then landing to pursue and will also provide the opportunity to harvest bears that were not seen from the air but were encountered the day the hunter flew into the unit. If adopted, it would also become legal for hunters to take brown bears at bait sites the same day the hunter has flown, which is currently allowed for numerous other units but not Unit 17. The adoption of this proposal is expected to increase the hunting harvest of brown bears.

BACKGROUND: By statute, allowing take of wolves using an aircraft SDA can only be authorized where a predator control program/IM plan is adopted and cannot be allowed under hunting regulations.

Brown bears are widespread and abundant in all of Unit 17. In 2011 the bag limit was changed from one brown bear per regulatory year to two brown bears per regulatory year. The average

annual harvest rate of brown bears taken between RY2011 and RY2023 is 90 (range of 51 –169) and most harvest occurs in 17B (Figures 33-1, 33-2 and 33-5).

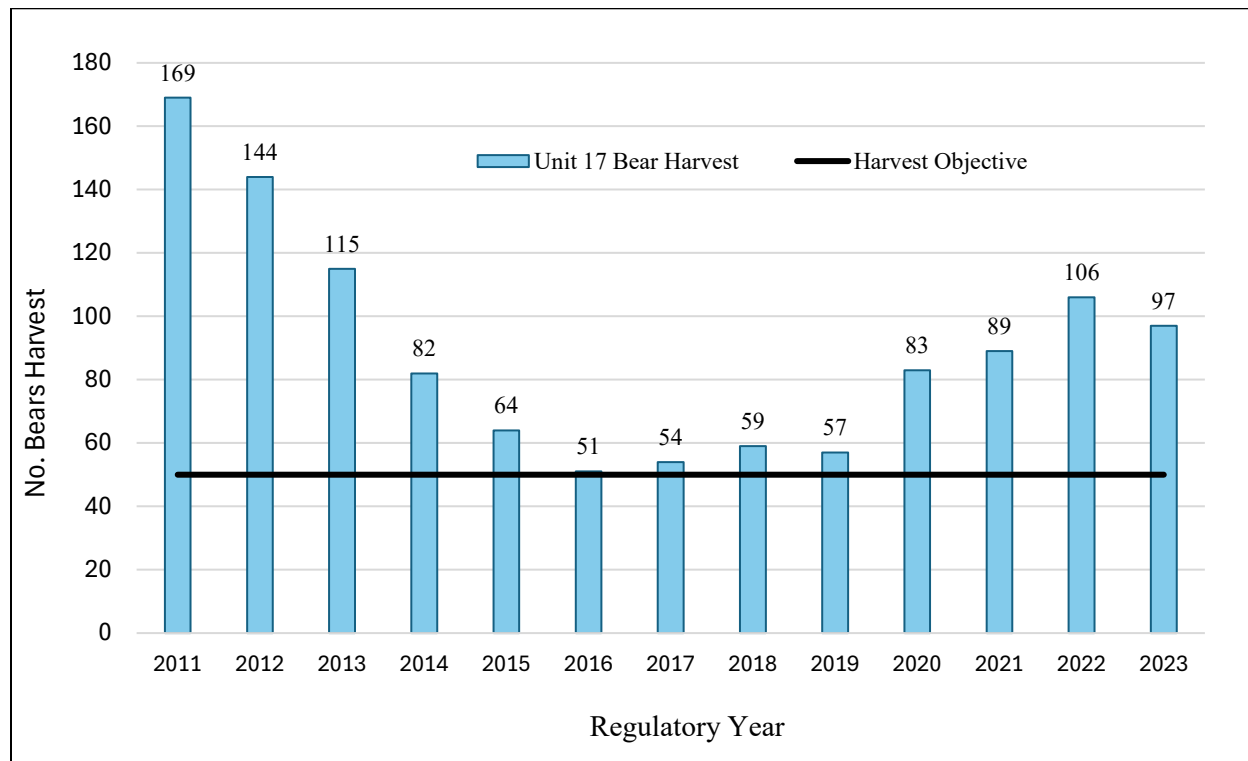


Figure 33-1. Total brown bear harvest in Unit 17 and minimum harvest objective, RY 2011–2023.

In 2003 and 2004, Togiak National Wildlife Refuge conducted dual observer line transect surveys for bears in Unit 17A and southwestern Unit 18 and documented a brown bear population estimate of 103 bears per 1,000 mi² across 8,281 mi² (Walsh *et al.* 2010). Prior to that, in 1993 through 1997, the department attempted to describe bear densities in the Killbuck mountains east of Bethel and northwest of Dillingham but were unable to critically assess densities due to political factors that prevented further bear capture and monitoring efforts. Fifty-two independent bears were detected throughout the study area resulting in a minimum density estimate of 55 bears per 1,000 mi² but managers suspected densities at least twice this size.

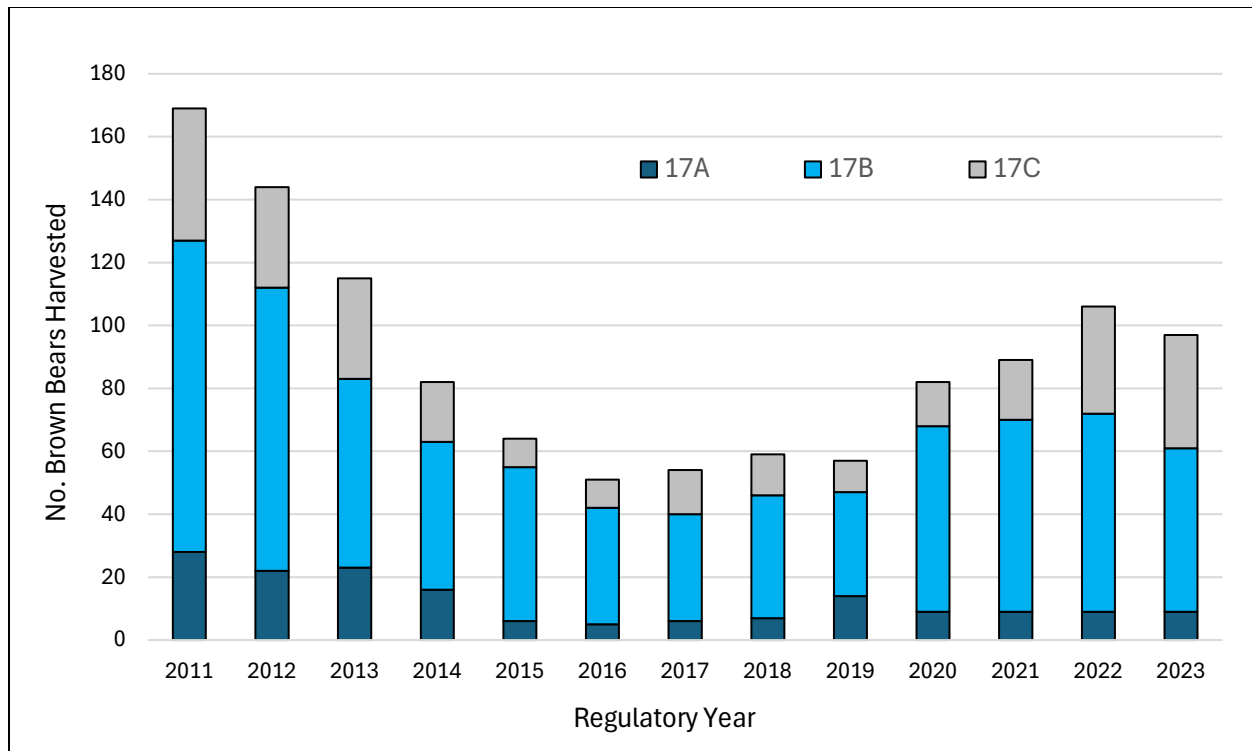


Figure 33-2. Unit 17 brown bear harvest by subunits, regulatory years 2011–2023.

Unit 17 brown bear harvest has routinely met or exceeded the harvest objective of at least 50 bears annually; comprised of 50% or less of females. Two of the last thirteen years experienced 50% or greater of the annual harvest comprised of females (RY 2018, 2021, Figure 33-3). Bear harvest in Unit 17 is driven in large part by guided nonresident hunters, as the resident harvest averages <25% annually (Figures 33-4 and 33-6). Much of the harvest occurs in the fall season during guided moose – brown bear combination hunts, when more nonresident hunters are in the field. Fall harvest has averaged 70 bears per year from 2013–2023. When Unit 17 harvests have a higher-than-average year, it can largely be attributed to increased spring harvest when winter conditions persist longer allowing safe and adequate travel conditions by snowmachine. When winter snow accumulation is low, freezing rain and wind, and/or warm coastal temperatures decrease snowpack a declining trend in harvest is seen (e.g., RY 2014, 2015, and 2019, Figure 33-7).

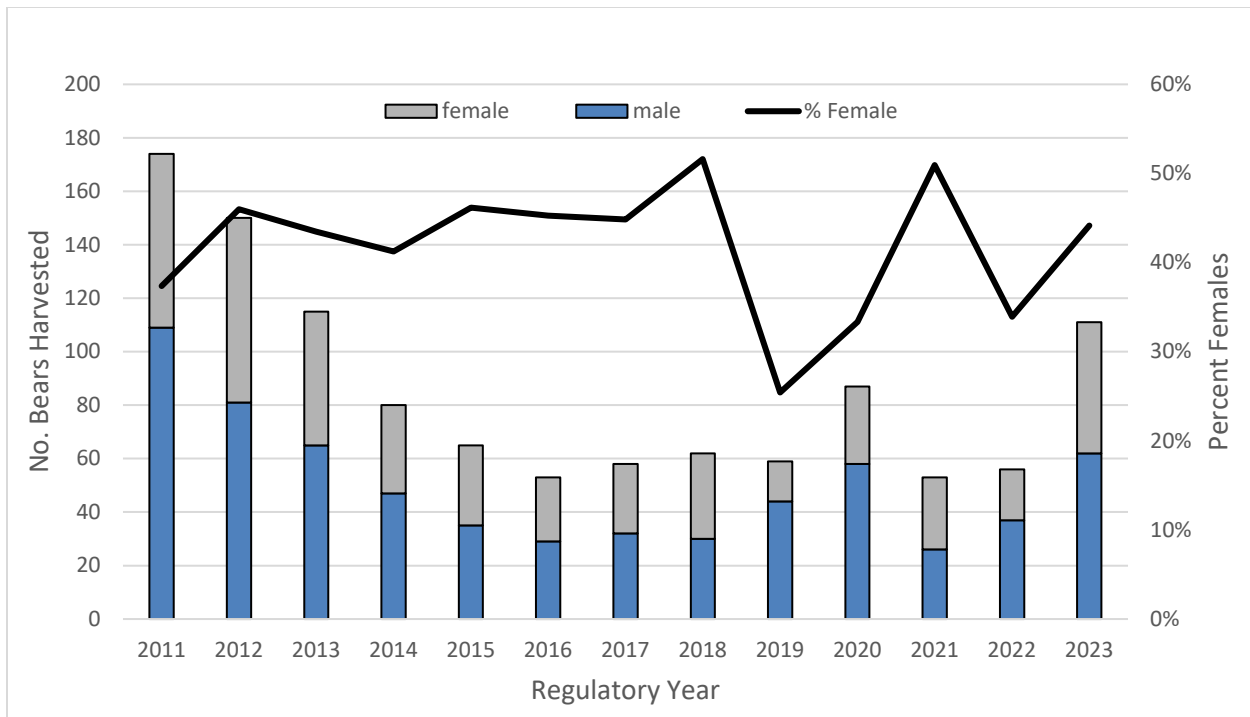


Figure 33-3. Brown bear harvest by sex in Unit 17 from regulatory years 2011-2023.

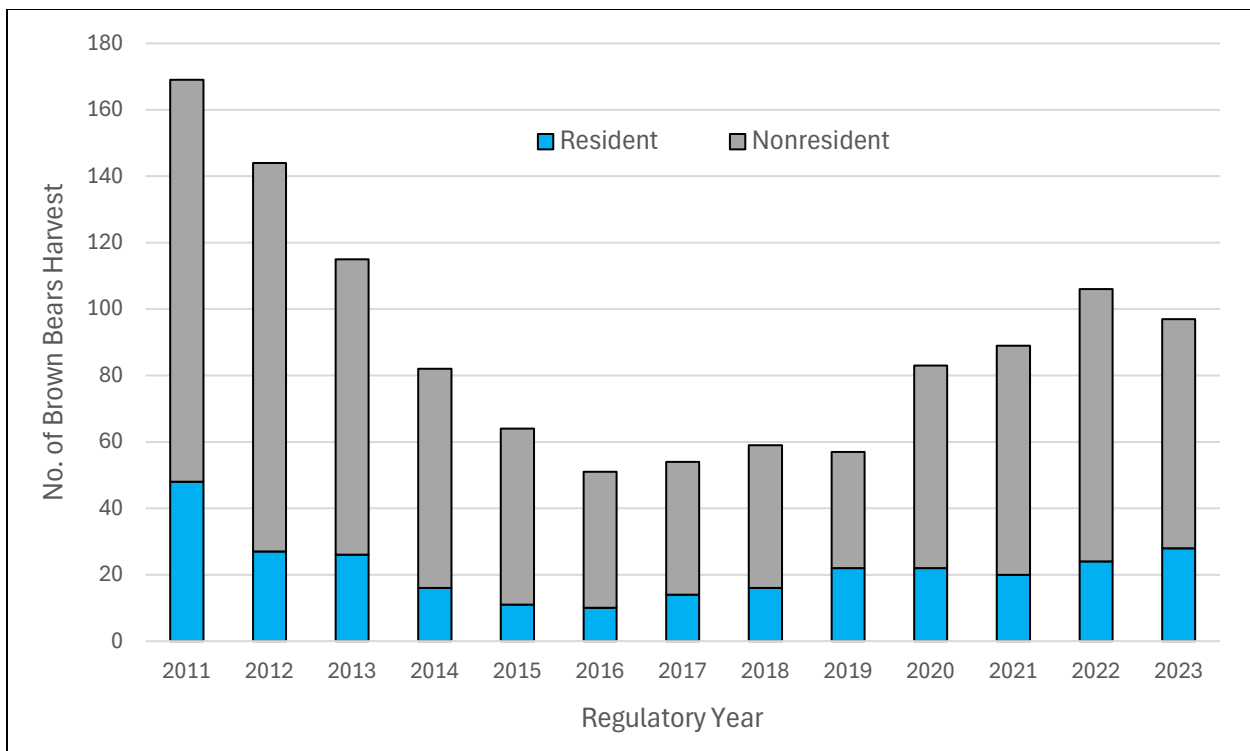


Figure 33-4. Brown bear harvest by residency in Unit 17 from regulatory years 2011–2023.

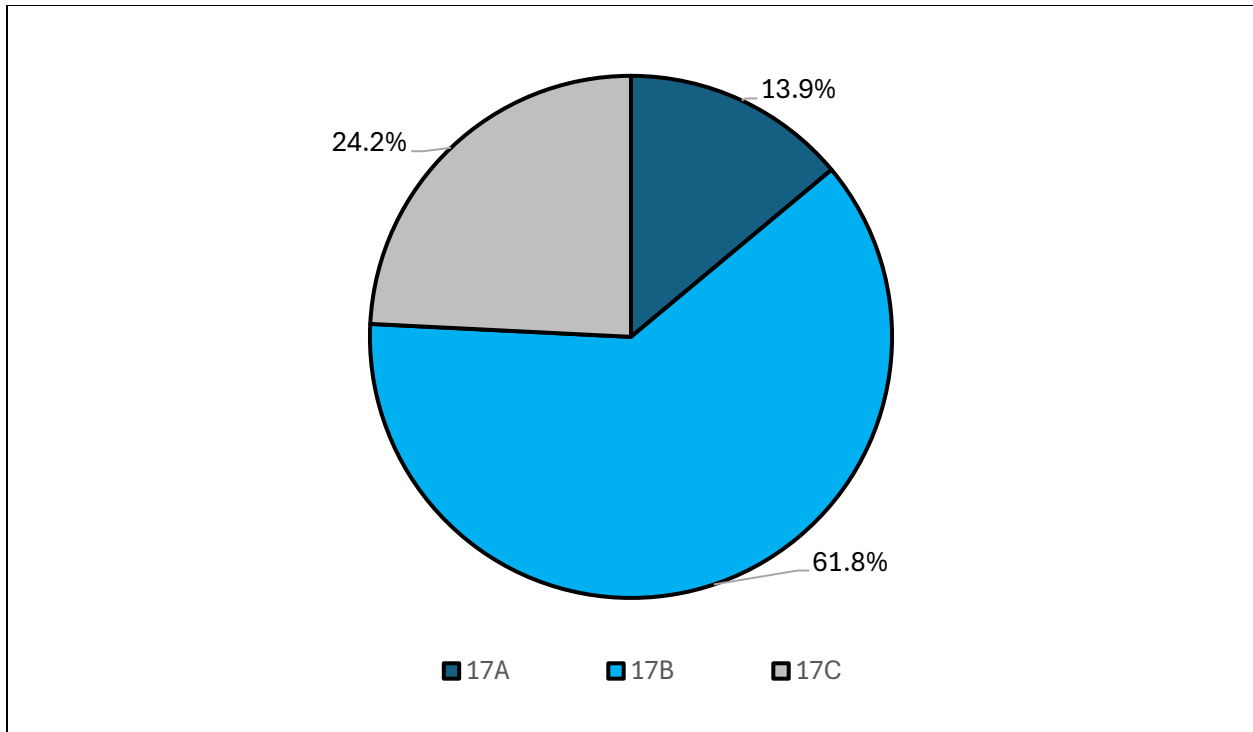


Figure 33-5. Brown bear annual average harvest percentage from Units 17A, 17B, and 17C from regulatory years 2011–2023.

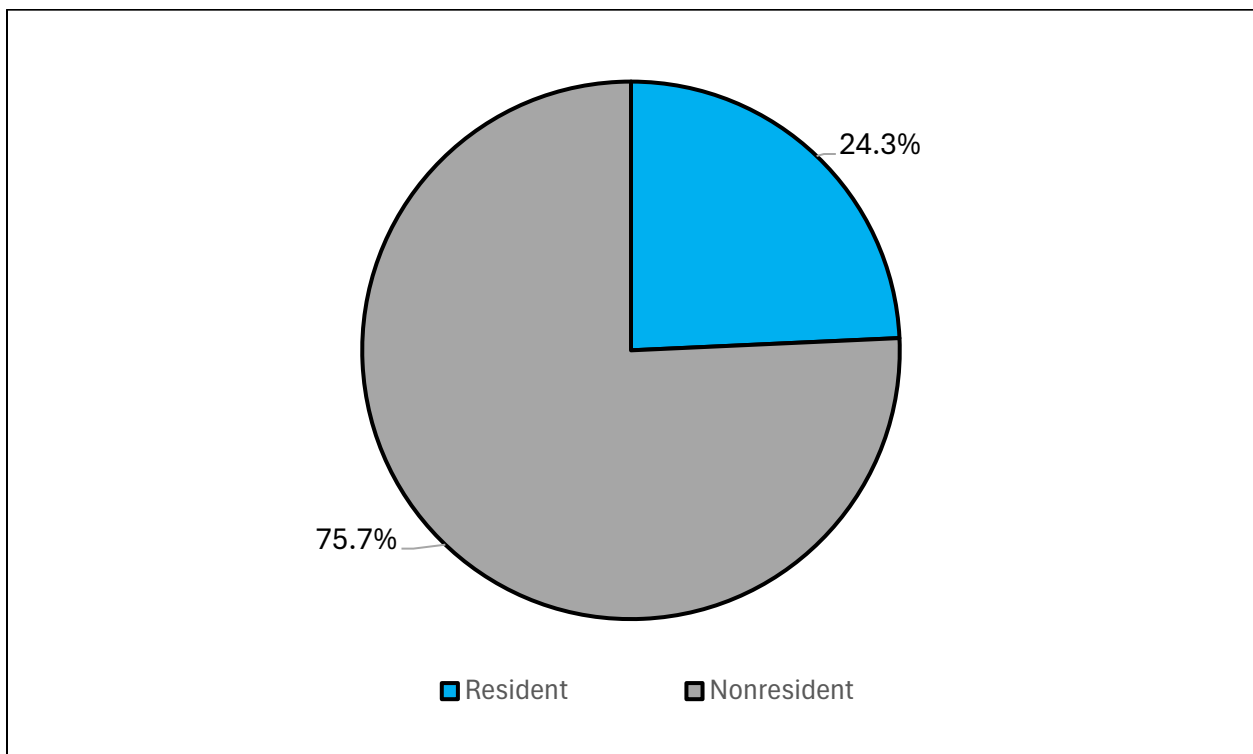


Figure 33-6. Average brown bear harvest percentage by residency status in Unit 17 from regulatory years 2011–2023.

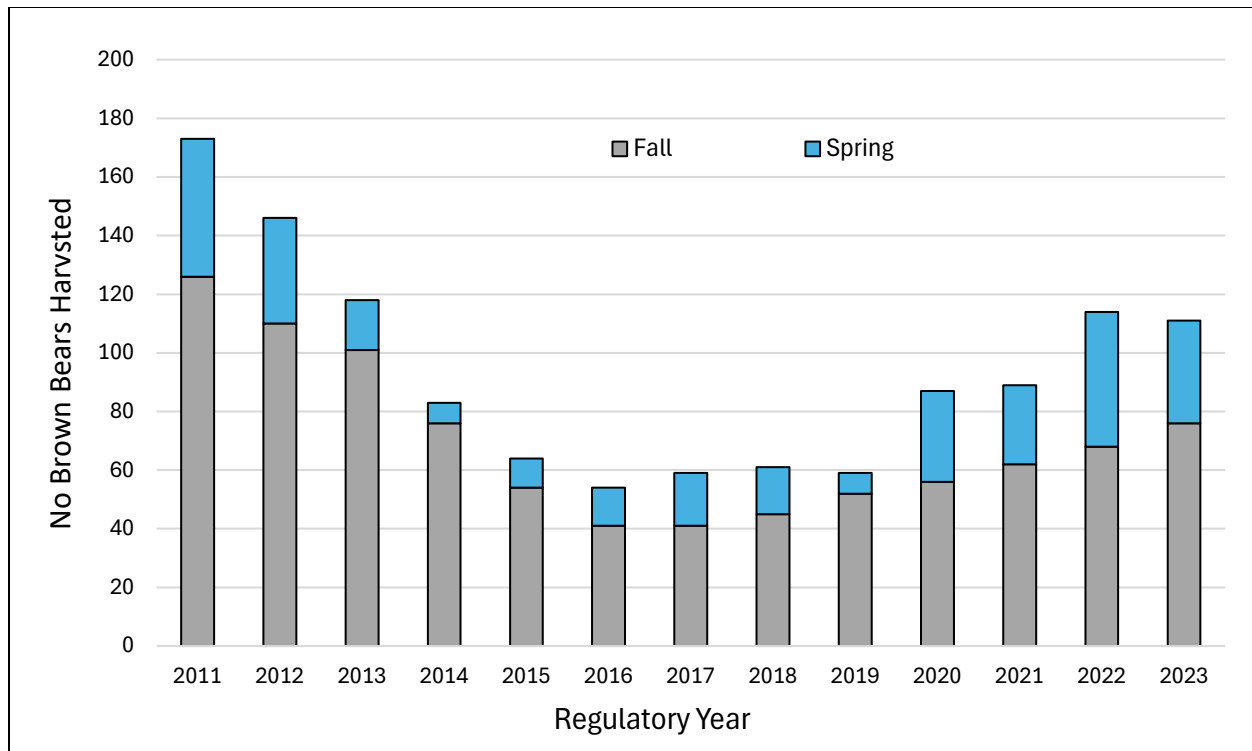


Figure 33-7. Brown bear harvest in Unit 17 by season from regulatory years 2011–2023.

This proposal is expected to target spring hunts while snow allows for locating tracks and animals from the air. Snow and ice provide benefits for access to locations that are not typically accessible to aircraft in snow free periods. Hunters would need to be at least 100 yards (300 feet) away from the airplane before harvesting a bear to remain lawful. During snow-free periods spotting brown bears from the air in locations that are conducive to landing planes would be limited. Unit 17 has a diverse array of access including many lakes and ponds suitable for float planes in the western portion of Unit 17, as well as tundra ridges in the eastern portion of the unit. Due to the remote nature of the unit, many people use aircraft for accessing their hunting locations. This proposal would allow them to also harvest brown bears the day they arrive incidentally without using the aircraft for locating the specific bears.

Currently, the Mulchatna Caribou Herd (MCH) Intensive Management plan allows members of the public to be permitted by the department to participate in predator removal activities in areas identified and approved by the BOG for intensive management. The MCH intensive management program has been insufficient in the number of participants, effort, and intensity to see a wolf population level reduction in an effort to see a positive response from the MCH. Current moose populations meet or exceed management objectives in 2 of the 3 subunits (17A and 17C) and may have indirectly benefitted from public wolf removal targeted for caribou. In the last 13 years of the SDA Intensive Management program, anywhere from 1 to 14 pilots participated, but in only one year of the program's history has aerial gunning been the highest method of take (Table 33-1). The SDA program is challenged by the remote nature of the unit, the lack of number of

participating pilots that live in the region, coastal winter weather and increasing aviation costs. Nushagak River communities are effective and efficient wolf hunters by snowmachine, and generally document higher harvest by these methods than those same-day-airborne participants.

Table 33-1. Wolf removal from wolf assessment area and wolf removal area, RY11 through RY23.

Period ^a	Reg Year	Non-SDA Harvest Removal from Area wolf assessment area (7,612 mi ²)		Department Control Removal from predation control area (2,870 mi ²)	SDA Public Control Removal from predation control area	Total Removal from wolf assessment area ^b	Minimum Spring Abundance (variation) in wolf assessment area
		Trap	Hunt				
Year 1	2011	14	52	0	11	77	14
Year 2	2012	17	0	0	0	17	-
Year 3	2013	0	10	0	0	10	-
Year 4	2014	0	0	0	0	0	-
Year 5	2015	19	2	0	0	21	-
Year 6	2016	26	28	0	3	57	-
Year 7	2017 ^c	30	10	0	30	70	-
Year 8	2018	12	0	0	11	23	-
Year 9	2019	3	45	0	28	76	-
Year 10	2020	20	4	0	28	52	-
Year 11	2021	5	14	0	0	19	-
Year 12	2022 ^d	19	7	5 ^e	25	56	-
Year 13	2023	6	8	14 ^f	13	41	-

^a Each respective year of data is from the ADF&G WinfoNet database; Fur Sealings, Fur Sealing Lookup.

^b Additional removal may be Defense of Life and Property (DLP), vehicle kills, etc.

^c In 2017 the Wolf Control Area was expanded to include 9,844 square miles.

^d Wolf Control Area was expanded in 2022 to 15,584 square miles to include Units 9B, 17B and C, 18, and 19A and B.

^e Department removal occurred in 1200 square miles in Units 17B, 18, and 19B.

^f Department removal occurred across two periods (April and May–June) in Units 18 and 19B in 530 square miles.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on allowing the take of brown bear in Unit 17 the same day the hunter has flown. Brown bears have not been identified as having a biological concern in Unit 17. If the board wants to allow the take of brown bears SDA the department recommends the board amend the proposal by adopting regulations consistent with other language for SDA that allows the take of game SDA provided the hunter is at least 300 feet from the airplane at the time of take. The department is **OPPOSED** to allowing the take of wolves in Unit 17 the same day the hunter has flown because statute prohibits the method of take unless

under the conditions of a permit issued as part of an IM program. There is also an active IM program that allows permittees to take wolves SDA as part of that program.

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

PROPOSAL 34 – 5 AAC 92.085 (8) Unlawful methods of taking big game; exceptions. Allow the take of brown bear in Unit 17 the same day the hunter has flown.

PROPOSED BY: Adam Grenda

WHAT WOULD THE PROPOSAL DO? This proposal would allow the harvest of brown bears the same day as being airborne in Unit 17 so long as the hunter is 300 ft. away from the airplane.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 17		
2 bears every regulatory year by registration permit only	Aug. 20 – May 31	No open season.
2 bears every regulatory year	Aug. 20 – May 31	Aug. 20 – May 31

5 AAC 92.085 (8)

It is against the law to hunt or help someone take big game until 3:00 am the day following the day a hunter has flown, except.

- (A) You may hunt deer the same day airborne (provided you are 300 feet from the airplane);
- (C) a person flying on a regularly scheduled commercial airline, including a commuter airline;
- (G) In specified units black and brown bears may be taken at permitted bait stations provided you are at least 300 feet from the airplane.

- (H) a hunter taking a black bear in Unit 16 from October 1 through August 9 if the hunter is at least 300 feet from the airplane at the time of taking;

....

There is a positive customary and traditional use (C&T) finding for brown bears in Unit 17(A) and Unit 17(B), that portion draining into the Nuyakuk and Tikchik Lake, with an amount reasonably necessary for subsistence (ANS) of 5 bears. There is also a positive C&T finding for brown bears in Unit 17B that portion not draining into the Nuyakuk and Tikchik Lake, Unit 17C, Units 19(A) and 19(B) upstream of and excluding the Aniak River drainage, and Unit 19(D) with an ANS of 10–15 brown bears. There is a positive C&T finding for wolves in Unit 17 with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would allow bear hunters to hunt brown bears the same day they have flown in Unit 17 provided increasing hunter opportunity and likely to increase brown bear harvest. This specifically allows the practice of spotting brown bears from the air and then landing to pursue them. It will also provide the opportunity to harvest bears that were not seen from the air but were encountered the day the hunter flew into the unit. If adopted, it would also become legal for hunters to take brown bears at bait sites the same day the hunter has flown, which is currently allowed for numerous other units but not Unit 17. The adoption of this proposal is expected to increase the hunting harvest of brown bears.

BACKGROUND: Brown bears are widespread and abundant in all of Unit 17. In 2011 the bag limit was changed from one brown bear per regulatory year to two brown bears per regulatory year. The average annual harvest rate of brown bears taken between RY2011 and RY2023 is 90 (range of 51–169) and most harvest occurs in 17B (Figures 34-1, 34-2, 34-4, and 34-5).

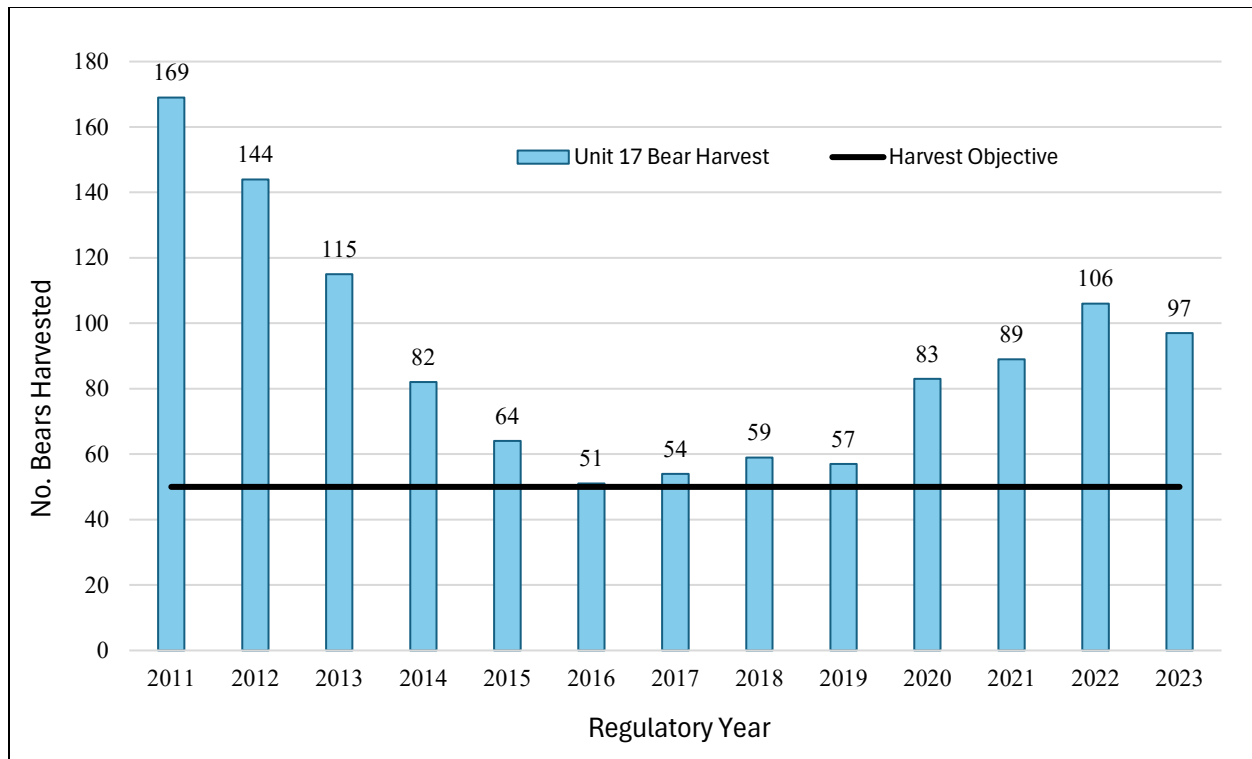


Figure 34-1. Total brown bear harvest in Unit 17 from RY2011–2023 and minimum harvest objective.

In 2003 and 2004 Togiak National Wildlife Refuge conducted dual observer line transect surveys for bears in Unit 17A and southwestern Unit 18 and documented a brown bear population estimate of 40.4 bears per 1,000 km² across 16,554 km² (Walsh *et al.* 2010). Prior to that, in 1993 through 1997 the department attempted to describe bear densities in the Killbuck mountains east of Bethel and northwest of Dillingham, but were unable to critically assess densities due to political factors that prevented further bear capture and monitoring efforts. Fifty-two independent bears were detected throughout the study area resulting in a minimum density estimate of 18.2 bears per 1,000 km² but managers suspected densities at least twice this size.

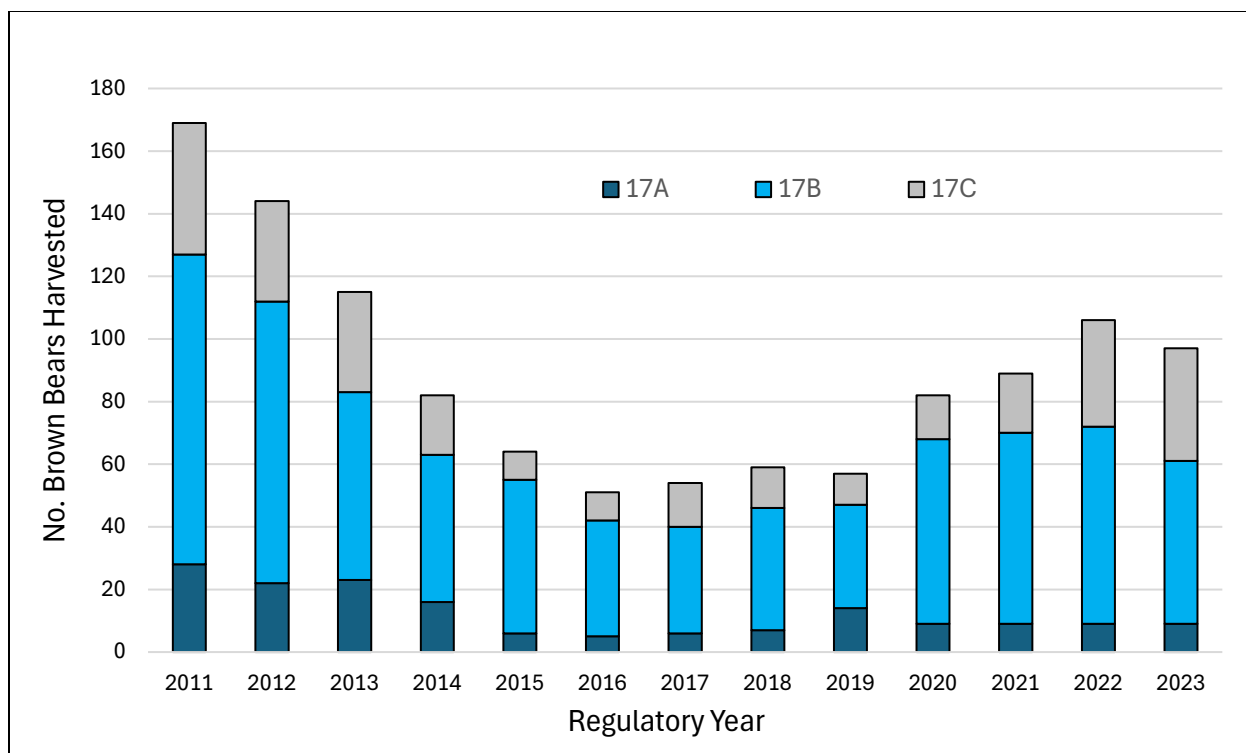


Figure 34-2. Brown bear harvest by 17 subunits for RY2011–2023.

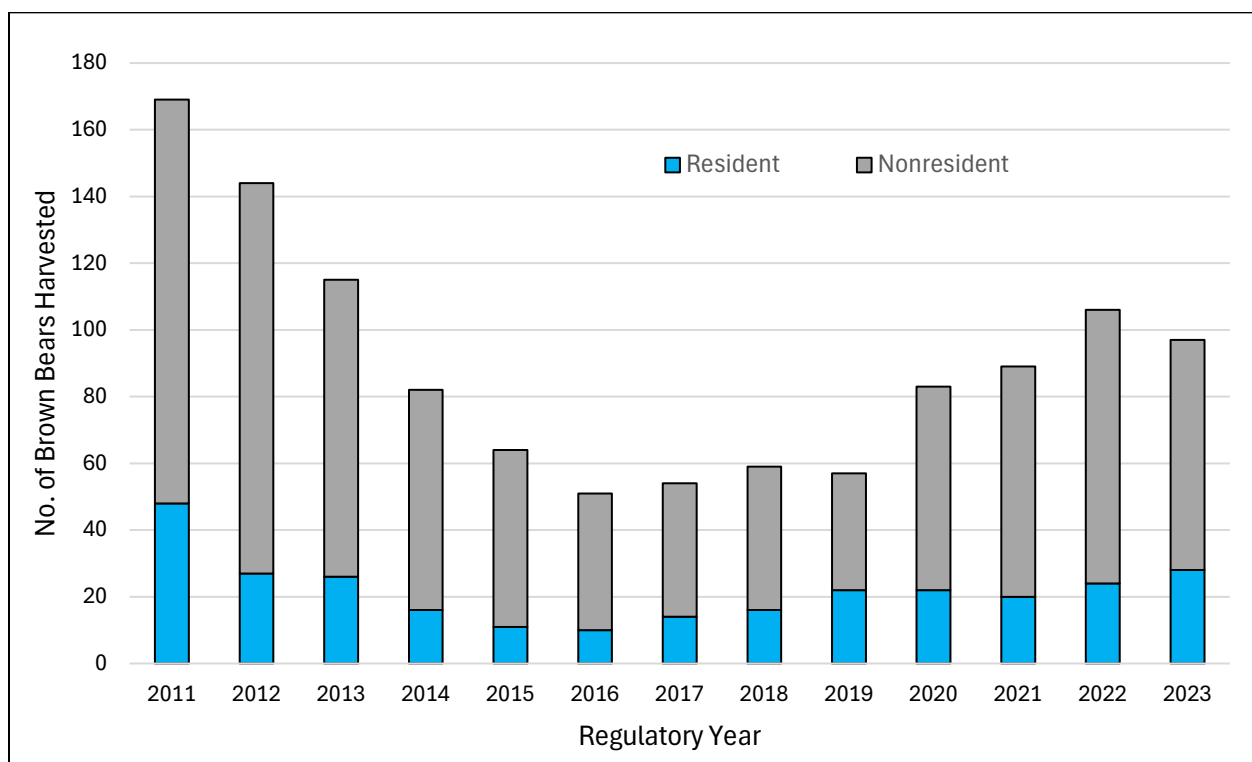


Figure 34-3. Brown bear harvest by residency in Unit 17 from RY2011–2023.

Unit 17 brown bear harvest has routinely met or exceeded the minimum harvest objectives of at least 50 bears annually, comprised of 50% or less of females. Two of the last thirteen years experienced 50% or greater of the annual harvest comprised of females (RY 2018, 2021, Figure 34-4). Bear harvest in Unit 17 is driven in large part by guided nonresident hunters, as the resident harvest averages <25% annually (Figure 34-3). Much of the harvest occurs in the fall season during guided moose – brown bear combination hunts, when more nonresident hunters are in the field. Unit 17B consistently has the highest reported harvest rates, primarily due in part to the large constituency of nonresident hunters capitalizing on the general moose hunt for that unit (Figure 34-4). Fall harvest is generally steady, averaging 70 bears per year from 2011–2023 (Figure 34-5). When Unit 17 harvests have a higher-than-average year, it can largely be attributed to increased spring harvest when winter conditions persist longer allowing safe and adequate travel conditions by snowmachine. When winter snow accumulation is low, freezing rain and wind, and/or warm coastal temperatures decrease snowpack a declining trend in harvest is seen (i.e., regulatory years (RY) 2014, 2015, and 2019) (Figure 34-4).

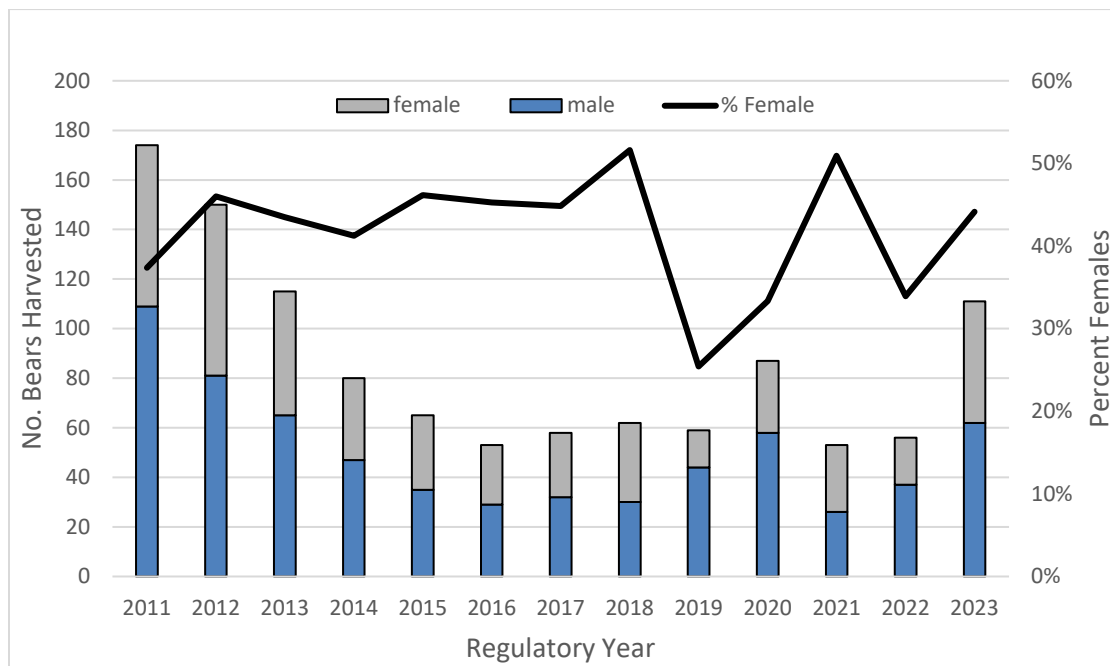


Figure 34-4. Brown bear harvest by sex in Unit 17 from regulatory years 2011-2023.

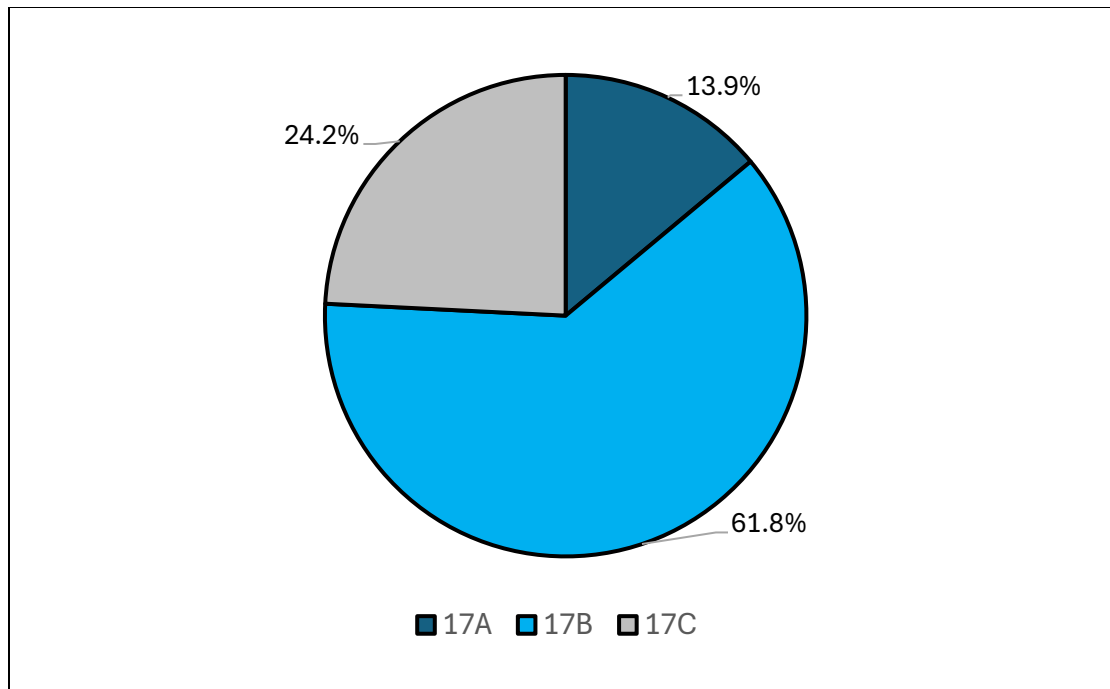


Figure 34-5. Brown bear annual average harvest percentage from Units 17A, 17B, and 17C from RY2011–2023.

This proposal is expected to primarily affect spring hunts and harvest when snow allows for locating tracks and animals from the air. Snow and ice provide benefits for access to locations that are not typically accessible to aircraft in snow free periods. During snow free periods, spotting brown bears from the air in locations that are conducive to landing planes would be limited. Unit 17 has a diverse array of access including many lakes and ponds suitable for float planes in the western portion of Unit 17, as well as tundra ridges in the eastern portion of the unit. Due to the remote nature of the unit many people use aircraft for accessing their hunting locations. This proposal would allow them to harvest brown bears the day they arrive incidentally without using the aircraft for locating the specific bears.

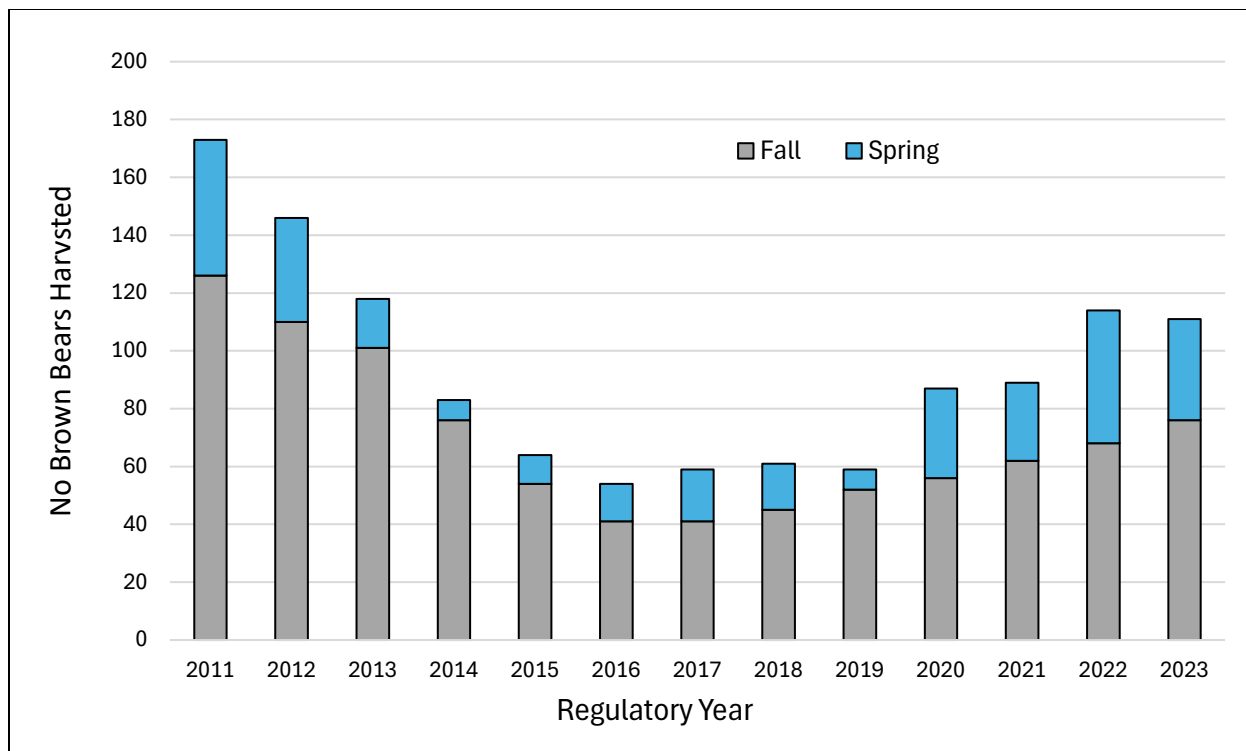


Figure 34-6. Brown bear harvest in Unit 17 by residency from RY2011–2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on allowing the take of brown bear in Unit 17 the same day a hunter has flown. Brown bear have not been identified as having a conservation concern in Unit 17.

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

PROPOSAL 35 – 5 AAC 84.270. Furbearer trapping. Shorten the trapping seasons for wolverine in Units 9 and 17 to end the last day of February.

PROPOSED BY: Rick Grant

WHAT WOULD THE PROPOSAL DO? The proposal would shorten the wolverine trapping season in Units 9B and 17 from November 10–March 31 to November 10–Last day in February.

WHAT ARE THE CURRENT REGULATIONS? The current wolverine trapping regulations can be found in 5 AAC 84.270 and in the *2024–2025 Alaska Trapping Regulations*.

Units and Bag Limits	Open Season	Bag Limit
...		
Units 6, 7, 9(A), 9(C), 9(D), 9(E), 11, 15 and 16(B)	Nov. 10 – Last day of Feb.	No limit.
Unit 9(B)	Nov. 10 – Mar. 31	No limit.
Units 17 and 18	Nov. 10 – Mar. 31	No limit.
....		
Units 19, 20(C), 21, 24, and 25 (except 25(C))	Nov. 10 – Mar. 31	No limit.

There is a positive customary and traditional use (C&T) determination for wolverine in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would shorten the trapping season dates by 31 days for wolverine to end the last day of February and would align the season dates for Unit 9B with the rest of Unit 9. However it would bring Units 17 and Unit 9(B) out of alignment with neighboring Units 18 and 19. The adoption of this proposal is likely to decrease opportunity for wolverine harvest.

BACKGROUND: Wolverines are widespread throughout southwest Alaska, ranging from the Togiak drainage, Wood River and Tikchik mountains, through the Nushagak, Mulchatna, and Kvichak watersheds. Although no data has been collected on the wolverine population in Units 9B and 17, trapper reports, and incidental and department observations of tracks during surveys for other species suggest they are common. Harvest levels fluctuate annually mostly affected by snowmachine access which can be confounded by freeze and snow conditions, and the presence of committed and experienced trappers in the area (Figure 35-1). In recent years <10% of the trappers account for 40% of the harvest. The average number of wolverine sealed per trapper has increased from 1.8 in 2013 to 3.3 in 2023 (Figure 35-2). In years with good snow conditions trappers can access wolverine-rich areas. In low snow years or during thaw cycles trappers are limited in their range and few wolverines are taken (i.e. regulatory years (RY) 2013–2015, Figure 35-5 & 35-6). Units 9B and 17 are remote and contain large areas of refugia for populations to maintain themselves through reproduction and immigration, and a portion of Unit 9B includes Lake Clark National Park which provides additional refugia for wolverine. Trapping accounts for 98% of the wolverine harvest across Unit 9B and 17 (Figures 35-6 & 35-7). The high price for wolverine fur, as well as some interest in wolverine as a big game species by hunters during the fall, contributes to a continued interest in taking wolverines in southwest Alaska with an average of 20 trappers sealing wolverines over the last decade (Woolington 2013).

Wolverines are generally solitary animals with large home range sizes, which may share portions of their range with the opposite sex during mating, their offspring at various times of the year, or defend territories from the same sex. Anecdotally, wolverine activity increases in March as more tracks are spotted more frequently along suspected travel corridors and thus is the preferred period to trap due to increased daylight hours, prime fur, and adequate travel conditions for hunters and trappers. Most wolverine harvests occur under a trapping license by conibear traps, and more recently by pursuit on snowmachine.

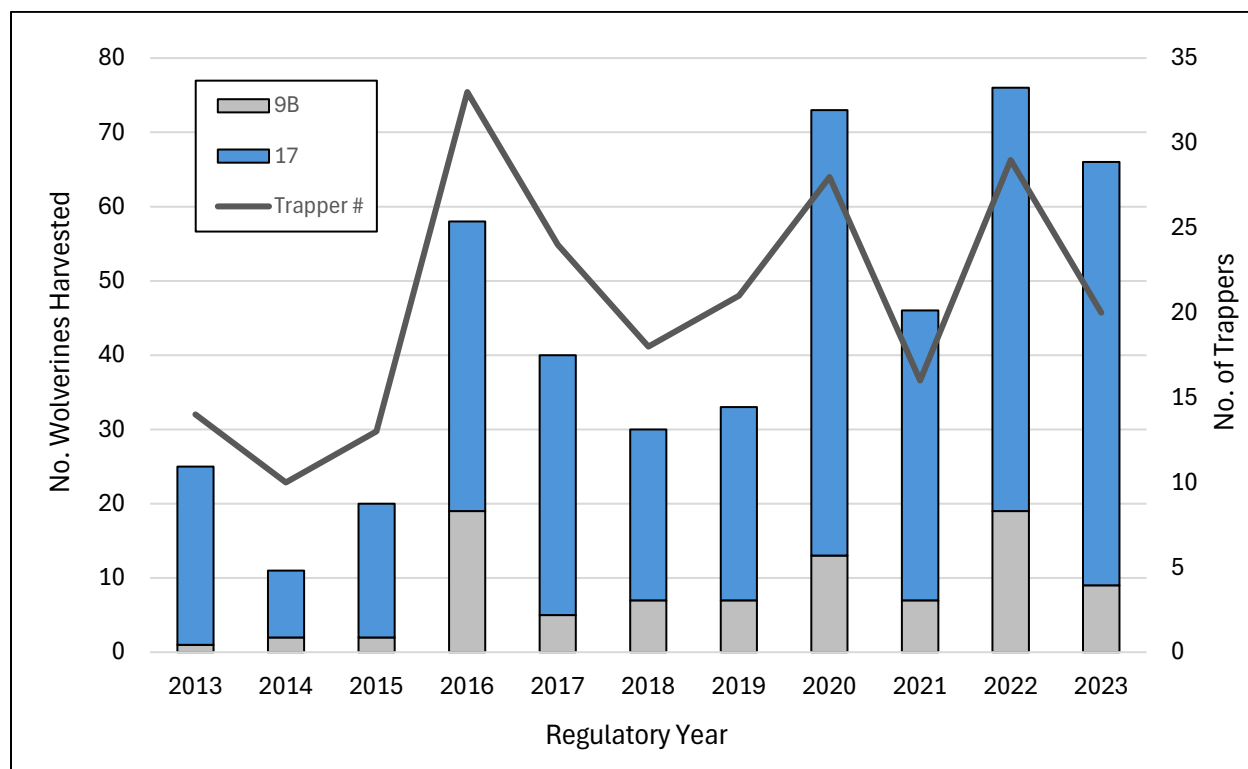


Figure 35-1. Wolverine harvest by units 9B, 17 and 18 and total number of trappers sealing wolverines from RY2013–RY2023.

Ground shooting by pursuit on snowmachine was allowed beginning in RY2022 and may include those taken under a hunting license or a trapping license, as ground shooting is an accepted method of take per both regulations. The long-term average harvest by ground shooting is 20% annually (range 0–35%).

The wolverine trapping effort is difficult to measure, due to lack of knowledge of the number of trap sets, length of trap line, and number of days for each trapper, but assessing sealing records indicates an increasing trend in the number of wolverines sealed per trapper from 1.8 in RY2013 to 3.3 in RY2023 (range of 1.1–3.3, Figure 35-2).

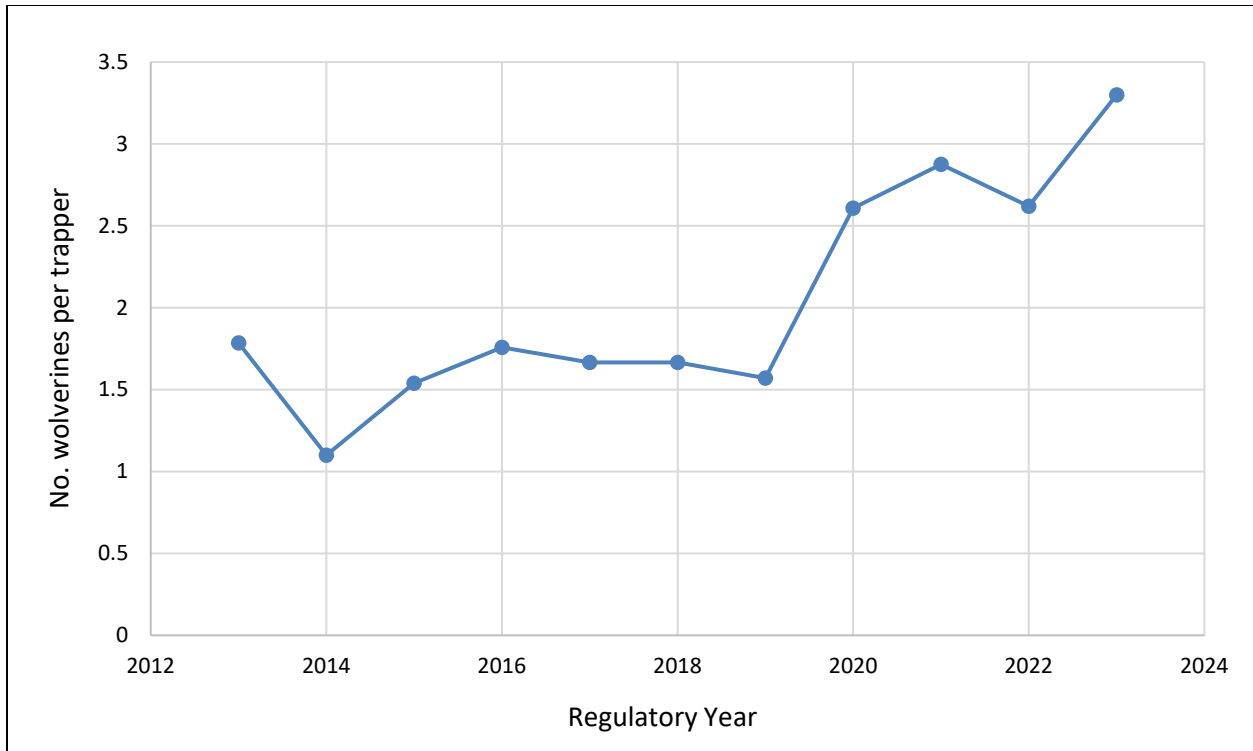


Figure 35-2. Average number of wolverines sealed per trapper in Unit 9B and 17 from RY2013–RY2023.

It appears that few wolverines live longer than 5 to 7 years in the wild. Some, however, do survive to 12 or 13 years of age. The primary natural mortality factors are starvation, being killed by larger predators, primarily wolves and by other wolverines. Wolverines are vulnerable to harvest and because of their limited reproductive capability and are sensitive to overharvest. Sustainable harvests in heavily trapped areas of Alaska depend on the presence of refugia as the source population of wolverines. The department has no biological concerns for the current harvest levels in Unit 9B and 17. However, if trapper effort and/or harvest, especially female harvest increases significantly the department will explore options for additional data collection, or consider regulatory action to reduce harvest. The proposed reduction of the trapping season would likely decrease harvest by ~30% across units 9B and 17 (Figure 35-3).

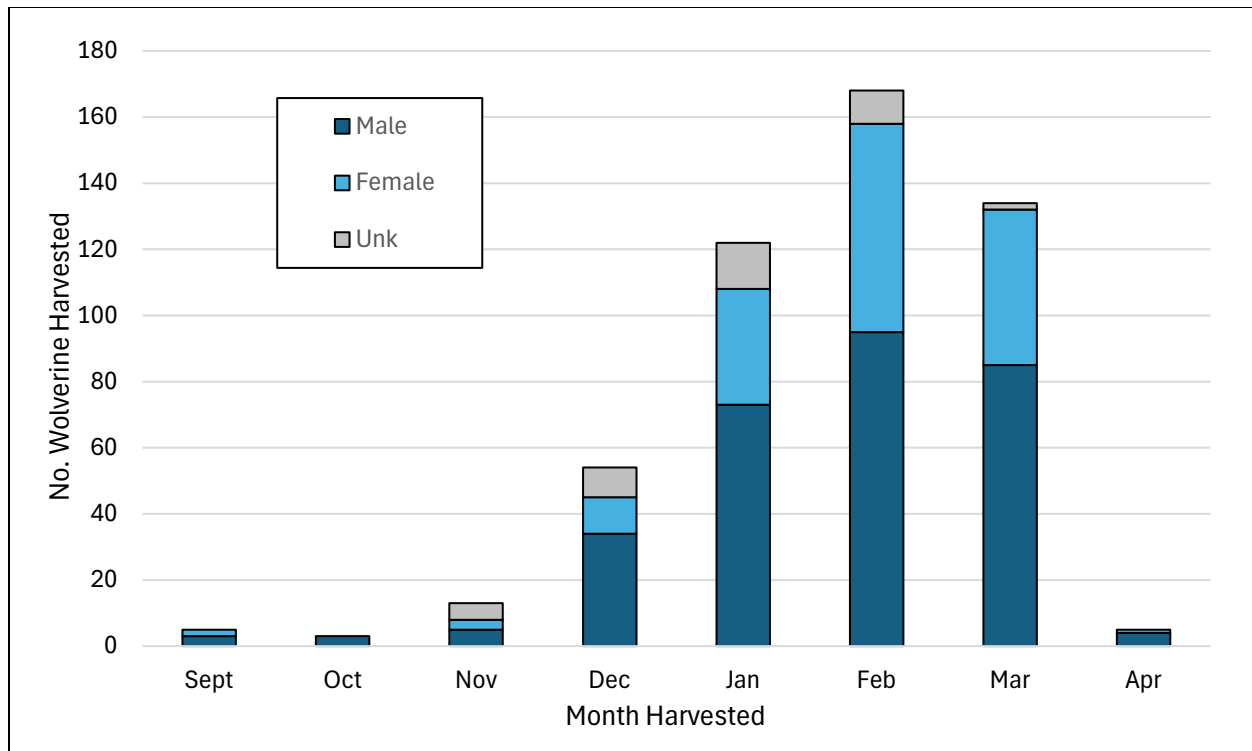


Figure 35-3. Wolverine harvest by month and sex in units 9B and 17 from RY2013–RY2023.

The long-term average number of wolverines sealed in Units 9B and 17 are 8 and 35 wolverine, respectively. Mild winters of calendar years 2012–2015 and 2018–2019 resulted in below average harvests, while winters of 2021–2023 had above average snowfall increasing safe travel conditions (Figures 35-5 and 35-6). The remote nature of Units 9B and 17, the lack of trapper participation, and multiple poor winters all contribute to sustainable wolverine populations across southwest Alaska.

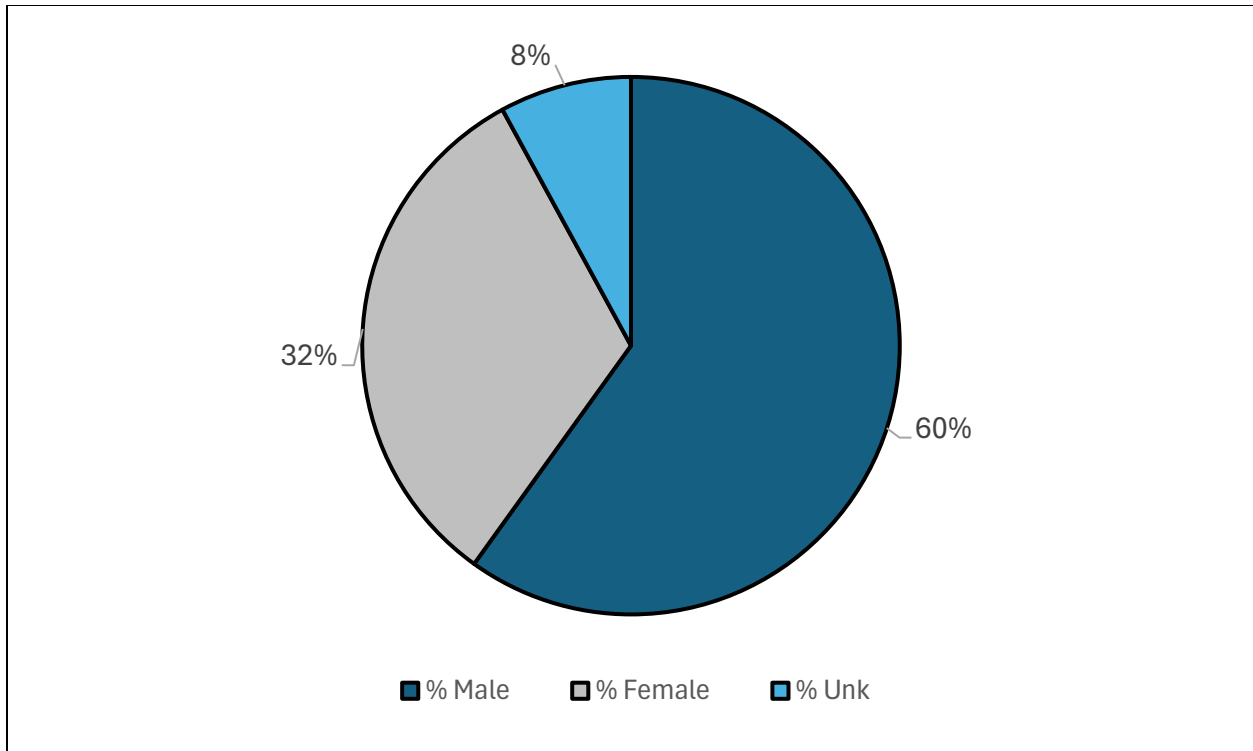


Figure 35-4. Wolverine harvest by sex across units 9B and 17 from RY2013–RY2023.

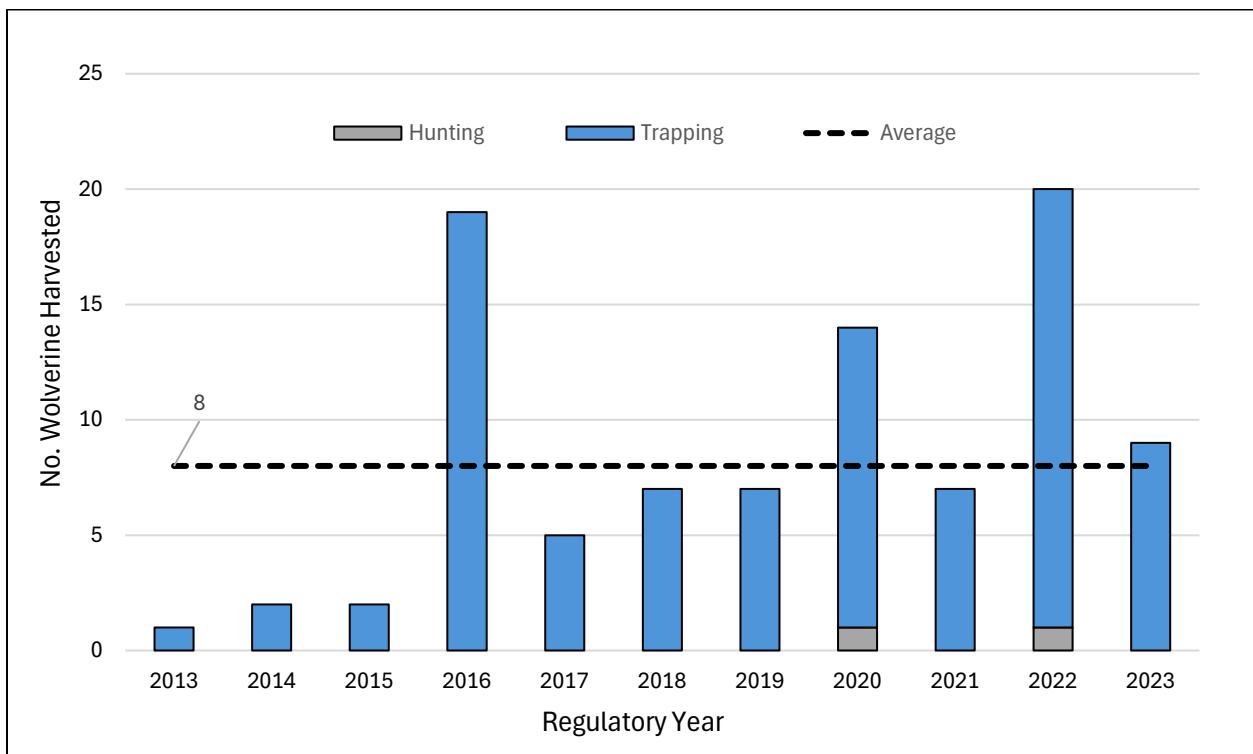


Figure 35-5. Wolverine harvest by regulation type in Unit 9B from RY2013–RY2023.

Wolverines breed in June and July, and females experience delayed implantation where after mating the fertilized egg's development is paused in the uterus prior to pregnancy in October–December. This process is theorized to allow females to rear kits when food is most abundant, in which females often cache food in snow dens. Kits are born between February and April and females are commonly found near persistent snowpack, likely increasing the chance for a suitable natal den. Litter sizes range from 1–4, and survival is often low. Wolverines are independent around 5–6 months but may share a maternal home range.

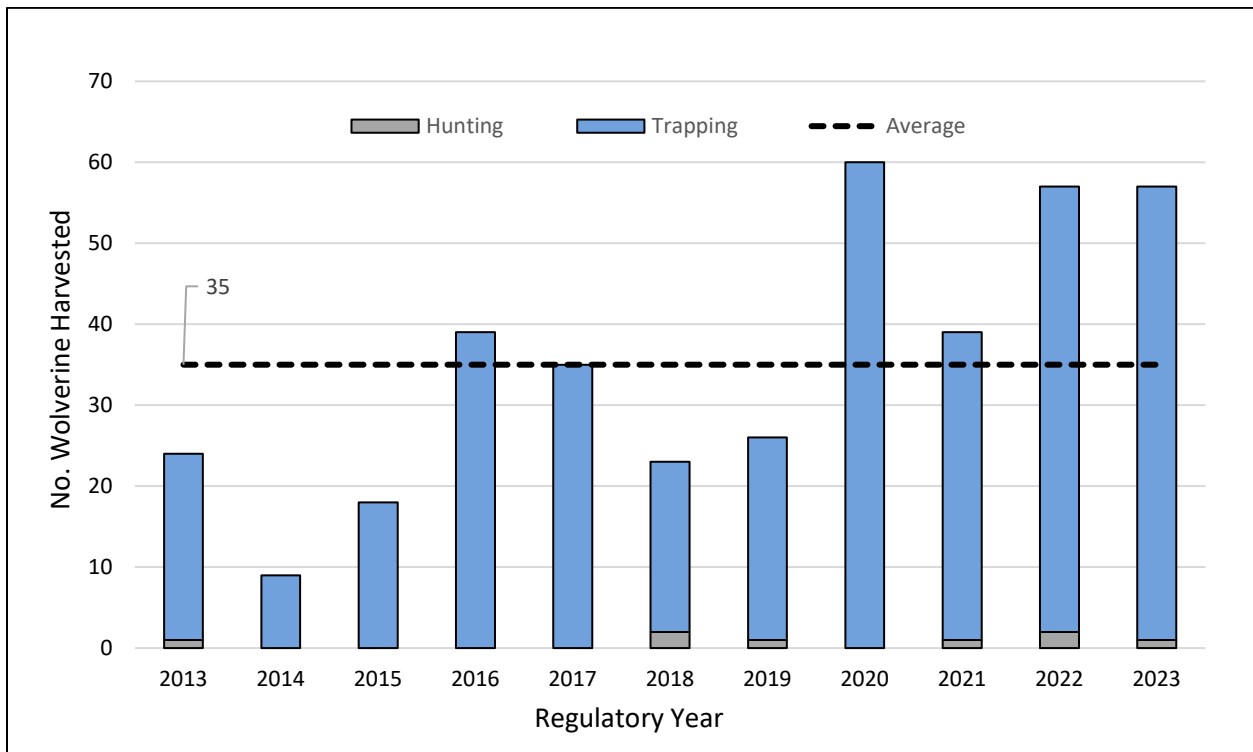


Figure 35-6. Wolverine harvest by regulation type in Unit 17 from RY2013–2023.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal as there is no identified biological concern for wolverines in Units 9B and 17. If the proposal is adopted, the board may wish to consider whether the regulations continue to provide reasonable opportunity for subsistence uses.

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

PROPOSAL 36 – 5 AAC 85.057 Hunting season and bag limits for wolverine. Shorten the wolverine hunting season in Unit 17.

PROPOSED BY: Rick Grant

WHAT WOULD THE PROPOSAL DO? This proposal would reduce the wolverine hunting season in Unit 17 from September 1–March 31 to September 1–last day of February.

WHAT ARE THE CURRENT REGULATIONS? The current wolverine hunting regulations can be found in 5 AAC 85.057 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Units 6-9, 12, 15, 16(B), 17 and 19–25, and 26(A)	Sept. 1 – Mar. 31	Sept. 1 – Mar. 31
1 wolverine		
...		
Unit 18	Sept. 1 – Mar. 31	Sept. 1 – Mar. 31
1 wolverine		
....		

There is a positive customary and traditional use (C&T) determination for wolverine in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would shorten the hunting season dates by 31 days for wolverine to end the last day of February. The adoption of this proposal will decrease opportunity for wolverine harvest, although by a small margin as most wolverines are taken under a trapping license and the trapping season in Unit 17 is currently open until March 31. Adoption of the proposal would also bring Unit 17 out of alignment with neighboring Units 18 and 19.

BACKGROUND: Wolverines are widespread throughout southwest Alaska, ranging from the Togiak drainage, Wood River and Tikchik mountains, and through the Nushagak and Mulchatna watersheds. Although no data has been collected on the wolverine population in Unit 17, trapper reports, and incidental department observations of tracks during surveys for other species suggest

they are common. Harvest levels fluctuate annually, mostly affected by snowmachine access. In recent years <10% of the trappers account for 40% of the harvest. In years with good snow conditions trappers can access wolverine-rich areas. In low snow years or during thaw cycles hunters and trappers are limited in their range and few wolverines are taken (e.g., regulatory years (RY) 2013–2015, Figure 36-1). Unit 17 is remote and contains large areas of refugia for populations to maintain themselves through reproduction and immigration. A total of 9 wolverines were taken under a hunting license accounting for ~2% of the total harvest from 2013–2023 (n= 387, Figure 36-2). The high price for wolverine fur, as well as some interest in wolverine as a big game species by hunters during the fall, contributes to a continued interest in taking wolverines in southwest Alaska.

Wolverines are generally solitary animals with large home range sizes, that may share portions of their range with their offspring at various times of the year. Anecdotally, wolverine activity increases in March as more tracks are spotted more frequently along suspected travel corridors. In addition, increased daylight hours, prime fur, and adequate travel conditions for hunters and trappers make this time of year the preferred period to trap/hunt.

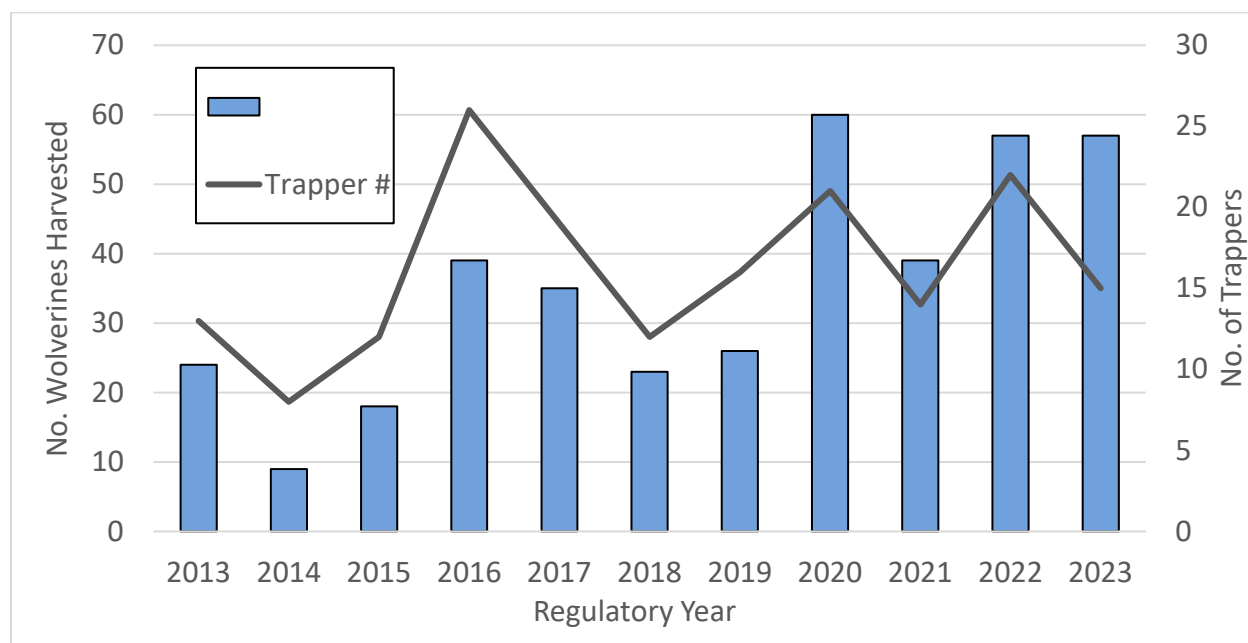


Figure 36-1. Wolverine harvest from unit 17 and total number of trappers per year sealing wolverines from RY2013 through RY2023.

Ground shooting by pursuit on snowmachine as a legal method of take was allowed beginning in RY2022 and may include those taken under a hunting or trapping license, as ground shooting is an accepted method of take per both regulations. The long-term average wolverine harvest by ground shooting is 20% annually (range 0–35%).

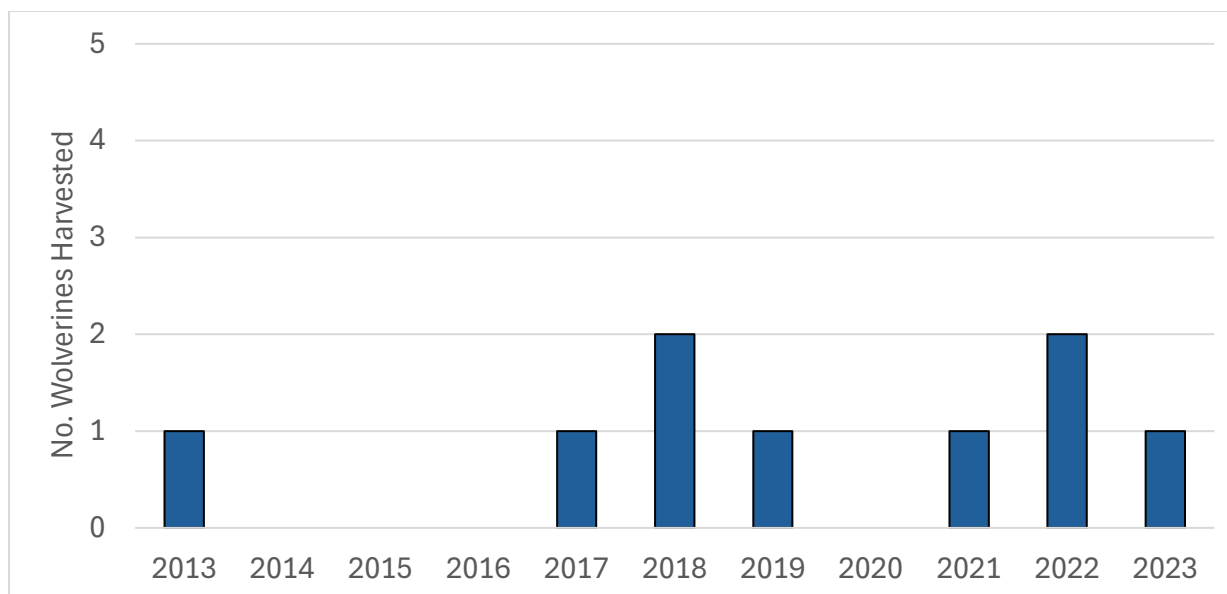


Figure 36-2. Wolverine harvest under hunting regulations from RY2013–2023 in Unit 17.

In the last 10 years wolverines taken under hunting regulations account for 2% of the total harvest and some of the hunting harvest occurs during September and October (Figure 36-3) when hunters are primarily pursuing moose or caribou and incidentally encounter a wolverine. The other wolverines harvested while hunting by pursuit via snowmachine occur in February and March, but generally are taken under the trapping regulations.

The department has no biological concerns for the current harvest levels, However, if female harvest increases significantly the department will explore additional data collection efforts, or consider regulatory action to ensure sustainable harvest. Current long-term harvest comprises of 34% females for Unit 17 (Figure 36-4). Wolverine harvest is variable due to trapper effort and winter conditions, but Unit 17 averages 35 wolverines harvested annually (Figures 36-5). The proposed reduction of hunting season dates is unlikely to have any effect on the wolverine population and would reduce some hunting opportunity.

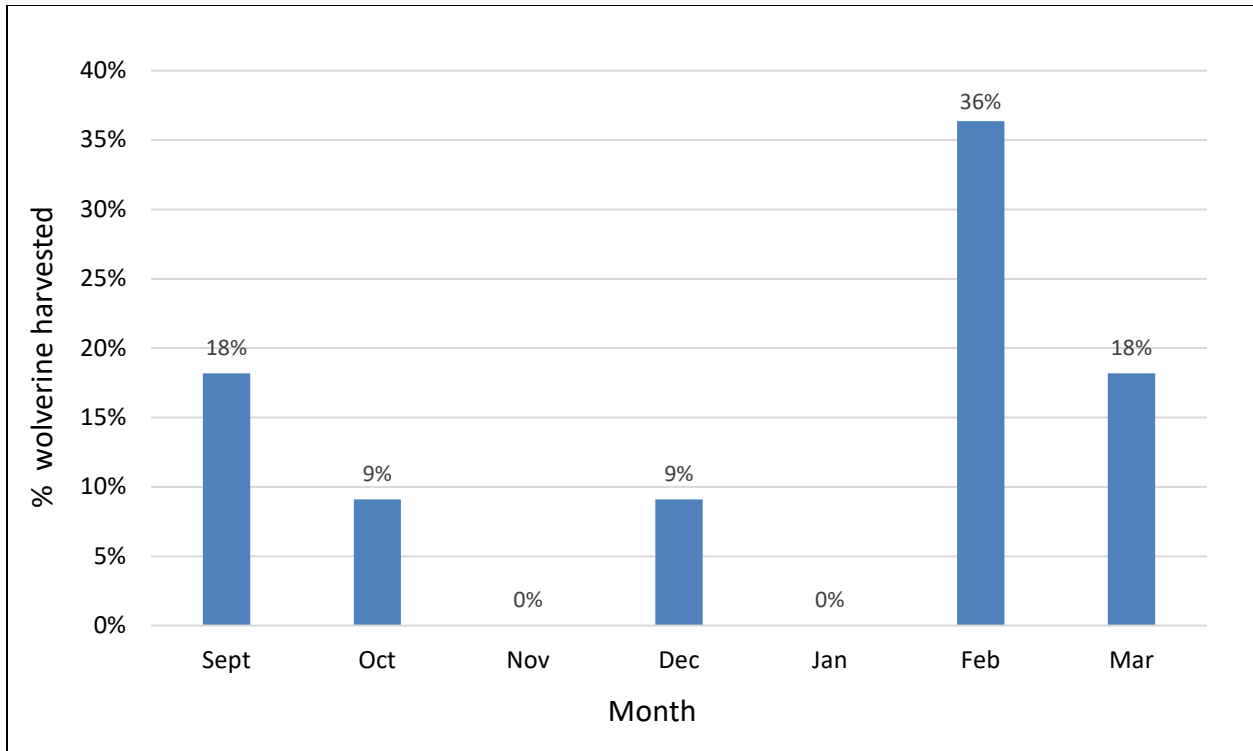


Figure 36-3. Percent of total wolverine harvest by month under hunting regulations Unit 17 from RY2013–2023

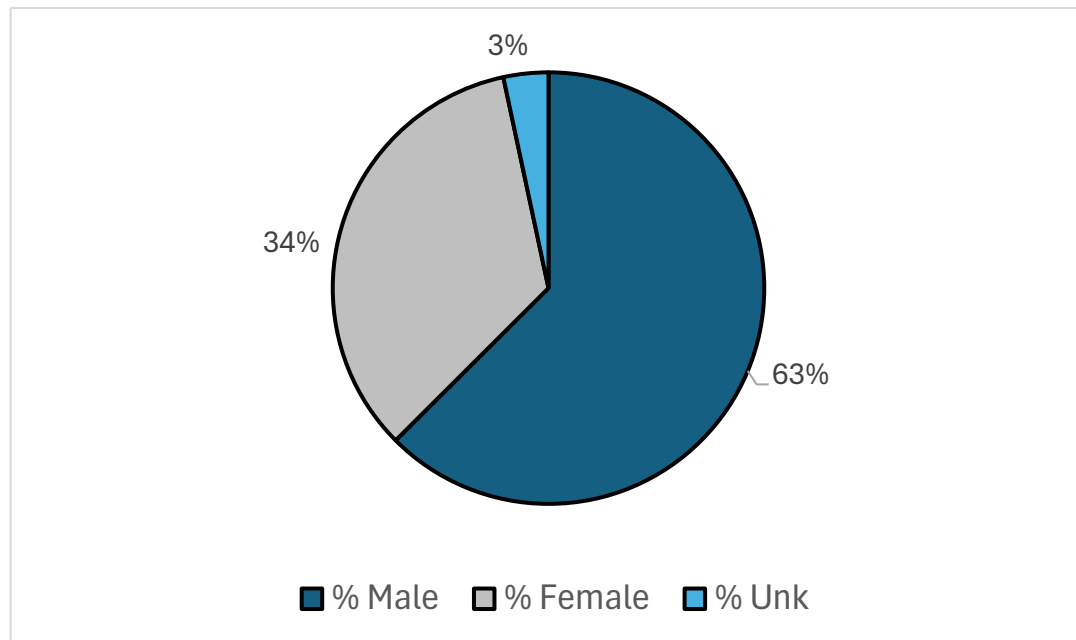


Figure 36-4. Wolverine harvest by sex through hunting and trapping regulations across Unit 17 from RY2013–2023.

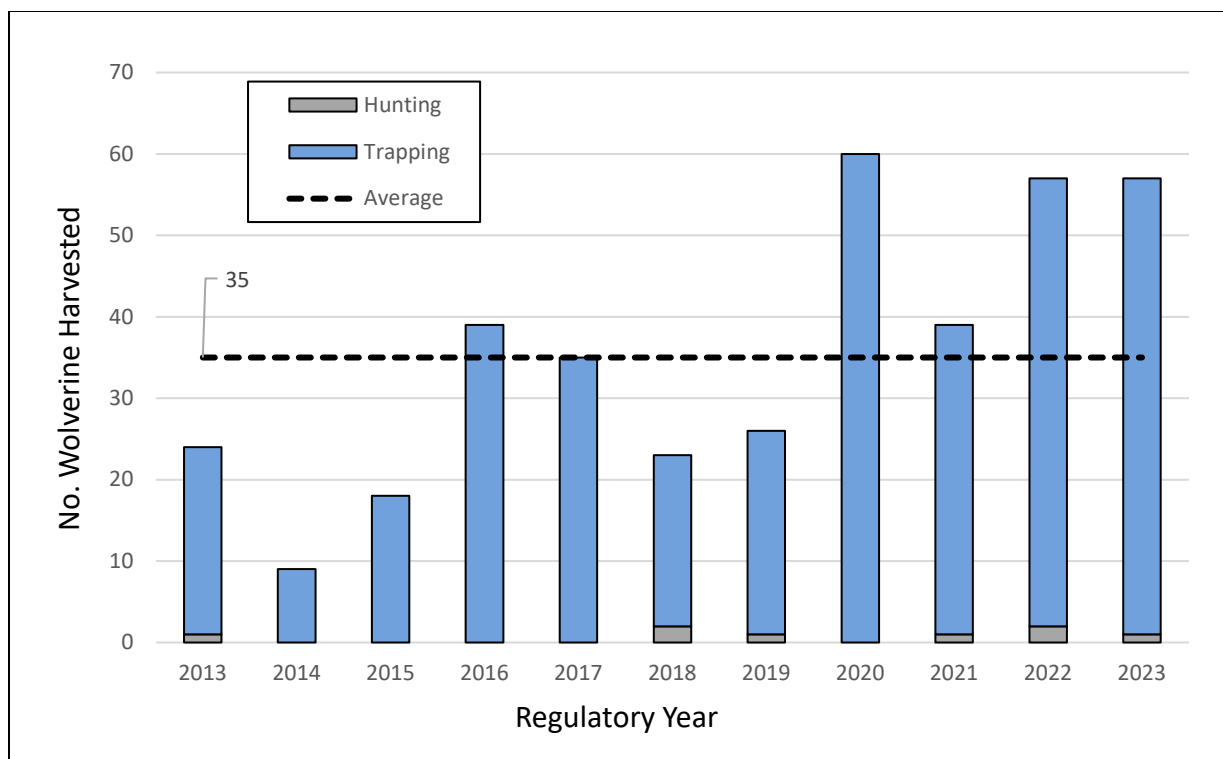


Figure 36-5. Wolverine harvest by regulation type in Unit 17 from RY2013–2023.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal as there is no identified biological concern for wolverines in Unit 17. Current regulations have been in place for a decade and wolverine populations have remained healthy even though some female wolverines are denning or beginning to initiate denning during the late February and early March. If this proposal is adopted, the board may wish to consider whether regulations continue to provide reasonable opportunity for subsistence uses of wolverine.

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

PROPOSAL 37 – 5 AAC 84.270, Furbearer trapping. Remove the bag limit of 2 beavers per day from April 15 – May 31 by firearm.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would remove the 2 per day bag limit for beavers with a trapping license from April 15–May 31 in Unit 17, and thus would clear up conflicting regulations found in 5 AAC 92.095 for beaver in Unit 17.

WHAT ARE THE CURRENT REGULATIONS? The current beaver trapping regulations can be found in 5 AAC 84.270 and in the *2024–2025 Alaska Trapping Regulations*.

...	Open Season	Bag Limit
Unit 17, firearms or bow and arrow may be used to take beaver from Dec. 1 – Apr. 14 and firearms may be used To take up to 2 beaver per Day from Apr. 15–Mar. 31	Oct. 10 – May 31	No Limit

Firearms may also be used to take beaver throughout the seasons and with bag limits established in 5 AAC 84.

There is a positive customary and traditional use (C&T) determination for beaver in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would result in increased beaver harvest opportunity and simplified regulations. There are currently no conservation issues with beavers in Unit 9 and removal of this bag limit is not expected to cause a decline in beaver populations.

BACKGROUND: Beavers were once the most important and sought-after furbearer in Unit 17, with >3,000 being sealed in some years during the 1980s. Beaver appear to be abundant throughout most of the unit, occurring in all major drainages and most smaller tributaries. In the past, season closures were imposed in portions of the unit on several occasions to allow populations to recover from trapping pressure. Low fur prices, number of trappers, weather, and the costs associated with trapping contribute to the decline in beaver trapping (Figure 37-1). However, the importance of beaver as food for local residents assures a base level of harvest regardless of other factors. There are no conservation concerns for beavers, and trap/snare continues to be the preferred method of beaver harvest (Figure 37-1).

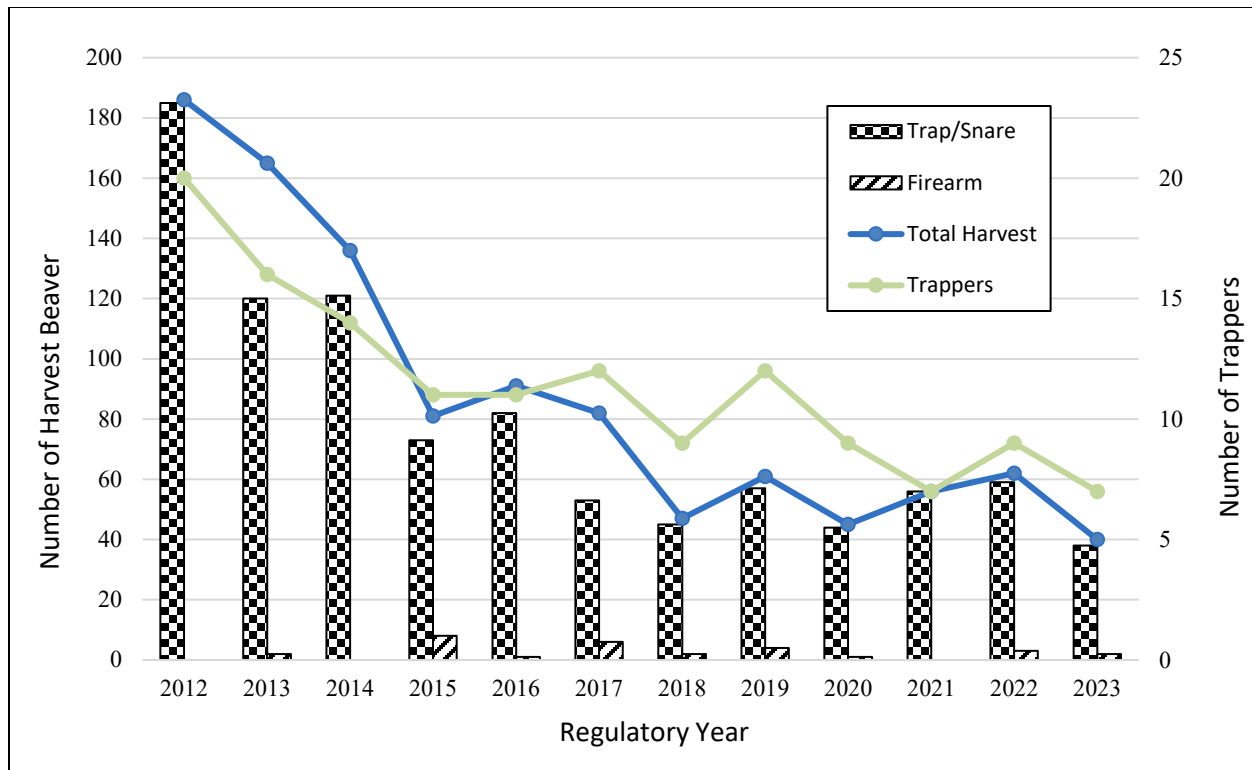


Figure 37-4. Number of harvested beaver and trappers by method of take during regulatory years 2012-2023. Beavers harvested by unknown method are not included in method columns but are reflected in total harvest.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to remove the 2 per day bag limit for beaver during April 15–May 31 in Unit 17 with a trapping license. Unit 17 currently has no bag limit for beaver under trapping regulations. The current bag limit by firearm is unnecessarily restrictive and conflicts with the regulation in 5 AAC 92.095 that allows the use of firearms for all trapping seasons and bag limits. Trapping effort has declined and therefore harvest has also declined leaving excess beaver available for those who continue to trap for both furs and subsistence meat. Beavers are found in most drainages where there is suitable habitat in Unit 17 and there are currently no conservation concerns.

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

PROPOSAL 38 – 5 AAC 92.066(4). Permit for access to Walrus Island State Game Sanctuary. Lengthen the permit dates to access Walrus Island State Game Sanctuary for hunting by 5 days.

PROPOSED BY: Qayassiq Walrus Commission

WHAT WOULD THE PROPOSAL DO? The proposal would extend the season dates for the co-managed Round Island Subsistence Walrus hunt by beginning the season five days earlier and changing the dates from September 10 – October 20 to September 5 – October 20.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.066 establishes a requirement for a permit to access Round Island, one of seven islands within the Walrus Islands State Game Sanctuary. 5 AAC 92.066 (4) states that “*an access permit for hunting may be issued under the conditions specified by the department on a case-by-case basis, subject to the application procedures and rules set out in (1) and (2) of this section, to hunting parties for the period of September 10 – October 20 only*”.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

By changing the start date of the hunt to open five days earlier, the proposal would increase opportunities for qualified subsistence hunting parties to harvest walruses on Round Island.

BACKGROUND: The Walrus Islands State Game Sanctuary was established in 1960 by the Alaska Legislature (AS 16.20.092) as Round Island was the last remaining terrestrial haulout for Pacific walruses in the state, with all other such haulouts having been abandoned due to “*excessive molestation and slaughter*” (AS 16.20.090(1)). The boards were given authority to adopt regulations governing access and hunting (AS 16.20.094).

Establishment of the sanctuary precluded access to Round Island (known as Qayassiq in Yupik, or “*place to go in a kayak*”) as a traditional walrus hunting destination for Alaskan Natives. In the early 1990s hunters from the community of Togiak petitioned the Board of Game to reinstate access to Round Island for a subsistence hunt. The Qayassiq Walrus Commission (QWC) was formed, which consisted of representation from the Tribal Councils of seven Bristol Bay communities (current QWC membership includes nine communities). In 1995 the board adopted regulations allowing the Alaska Department of Fish and Game (department) to issue walrus hunt access permits and a cooperative agreement was developed and signed between the QWC, the Eskimo Walrus Commission, the department, and the U.S Fish and Wildlife Service. The agreement was meant to allow for traditional practices while minimizing impacts to the Walrus Islands State Game Sanctuary. The signatories established participant roles, hunt conditions, harvest quotas, and season dates. The initial agreement set the quota at 10 walruses with season dates of October 1-31. Per the agreement, the QWC determines qualifications for hunt captains and allocates hunt permits among the participating communities. The department issues access permits to hunters holding valid QWC hunt permits.

Past proposals to change the season dates were meant to mitigate challenging weather patterns that typically increase in frequency as the fall progresses, making access to the island difficult. In 1997 the Board adopted a proposal by the QWC to change to the season to September 20 - October 20 and to increase the harvest limit to 20 walruses struck (includes those retrieved and lost). In 2003, the Board adopted a proposal to change the season dates to September 10 - October 20.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. Pacific walrus are managed under the authority of the U.S. Fish and Wildlife with harvest restricted to qualified Alaskan Native hunters. The harvest quota of 20 walrus for the Round Island hunt is unlikely to have an impact on walrus populations. Participation in the hunt has been low in recent years with no reported harvest on Round Island from 2017-2023. Changing the season to start five days earlier may result in increased participation in the hunt. The cooperative agreement has conditions in place to mitigate the potential for disturbances and to monitor the impact of the hunt on haul out attendance.

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

PROPOSAL 39 – 5 AAC 92.108. Identified big game prey populations and objectives. Reduce moose abundance and harvest objectives for Unit 13B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? If adopted the intensive management objectives for the moose population in Unit 13B would decrease from a range of 5,300–6,300 moose to a range of 4,500–5,500 moose. The moose harvest objectives would decrease from a range of 310–620 to a range of 200–400 moose.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose.

5 AAC 92.108. Identified big game prey populations and objectives:

For purposes of implementing AS 16.05.255(e) - (g), the Board of Game has made the following findings on whether the listed big game prey populations, or portions of those populations, are identified as important for providing high levels of harvest for human consumptive use, and has established the following population and harvest objectives:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13B	Positive	5,300–6,300	310–620
....			

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted the midpoint of the abundance objectives would shift from 5,800 moose to 5,000 moose. This midpoint is relevant to predator control triggers outlined in 5 AAC 92.121, including that the Unit 13 predator control program may be reviewed, modified, or suspended when the mid-point of the IM population and harvest objectives for the moose population is achieved. This mid-point of the abundance objective would also be relevant as a trigger for implementing antlerless moose harvest when moose abundance is relatively high. The midpoint of the harvest objectives would shift from 465 to 300, but the abundance of moose would still be the main trigger for predator control as it is now. Both abundance and harvest levels at this time would remain below objectives if this shift were implemented. The current objective harvest rate is roughly 5.5%–9.0%, and the new objective harvest rate would be roughly 4.3%–6.8%, which is far more reasonable for an area where cow harvest cannot be reliably obtained when abundance is high due to regulatory frameworks.

BACKGROUND: Unit 13B has been included in an intensive management program for moose in Unit 13 since regulatory year (RY) 2001. Historically population trends in Unit 13B have been assessed through minimum count surveys in established Trend Count Areas (CAs). Minimum count (MC) and composition surveys have been conducted in these established CAs almost annually since 1965, providing a robust estimate of population composition after the hunting season, as well as reliable insights into overall population abundance trends through time, but these surveys did not result in actual abundance estimates for the entire subunit.

The implementation of intensive management required abundance objectives and abundance estimates for moose, which has been a challenge to quantify in many areas. The original abundance objective for Unit 13B was set in RY1995 as 5,300–6,300 moose, which represented an objective of roughly 1.9–2.3 moose per square mile for what was considered available moose habitat at that time.

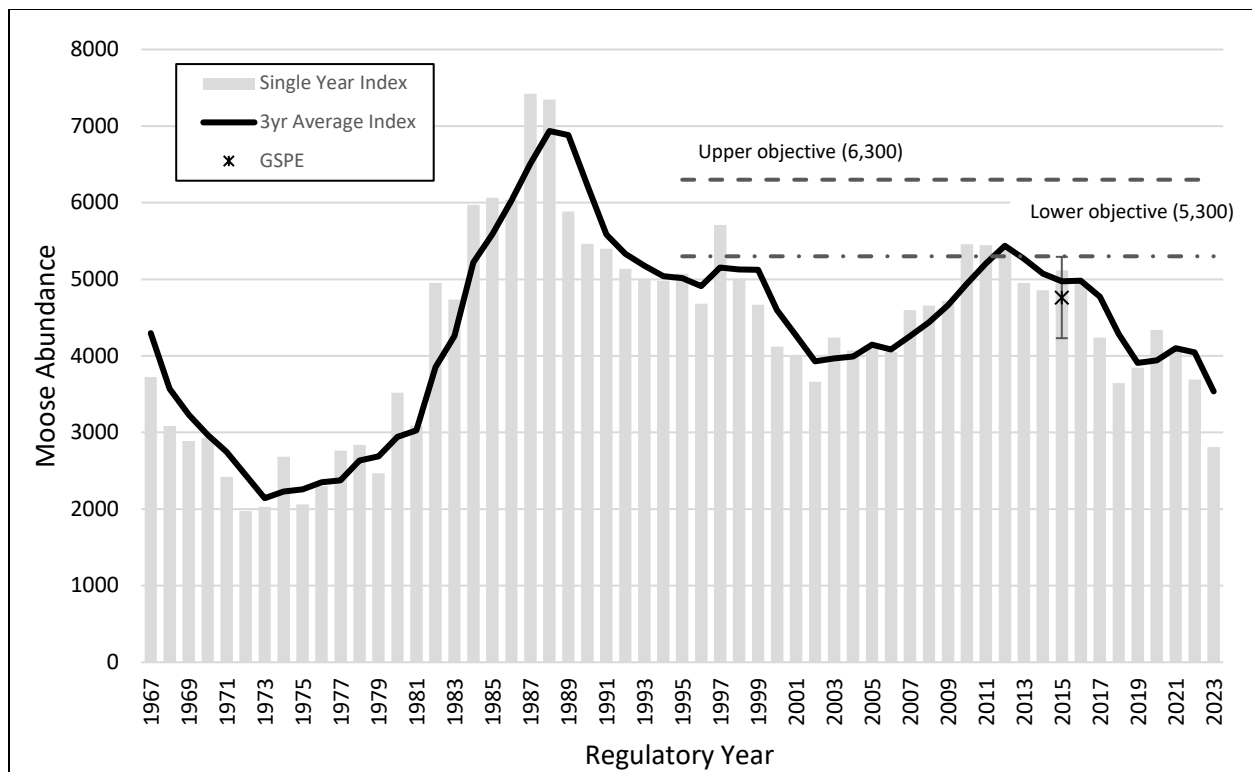


Figure 39-1. Moose abundance index, objectives, and GSPE survey results in Unit 13B, RY1967–2023.

The history of population growth and decline throughout time suggests that the peak observed in 2010–2012 may have been near the carrying capacity for the landscape at that time, and the peaks observed from 1984–1989 are not a desirable objective. Since 2012, moose abundance in Unit 13B has declined as would be expected after a period of overabundance despite active wolf control

efforts in RY2013 and RY2018–2020 and relatively low wolf abundance in RY2021. Calf-to-cow ratios have also declined since roughly 2009 (Figure 39-2). Wolf control was reactivated in RY2023.

The history of moose abundance in Unit 13B suggests that a more biologically sustainable and productive objective range would be at or below the most recent peaks observed in 2010–2012. The proposed objectives of 4,500–5,500 moose target the most recent period of higher abundance, and to maximize productivity an even lower objective range may be appropriate (Figure 39-3).

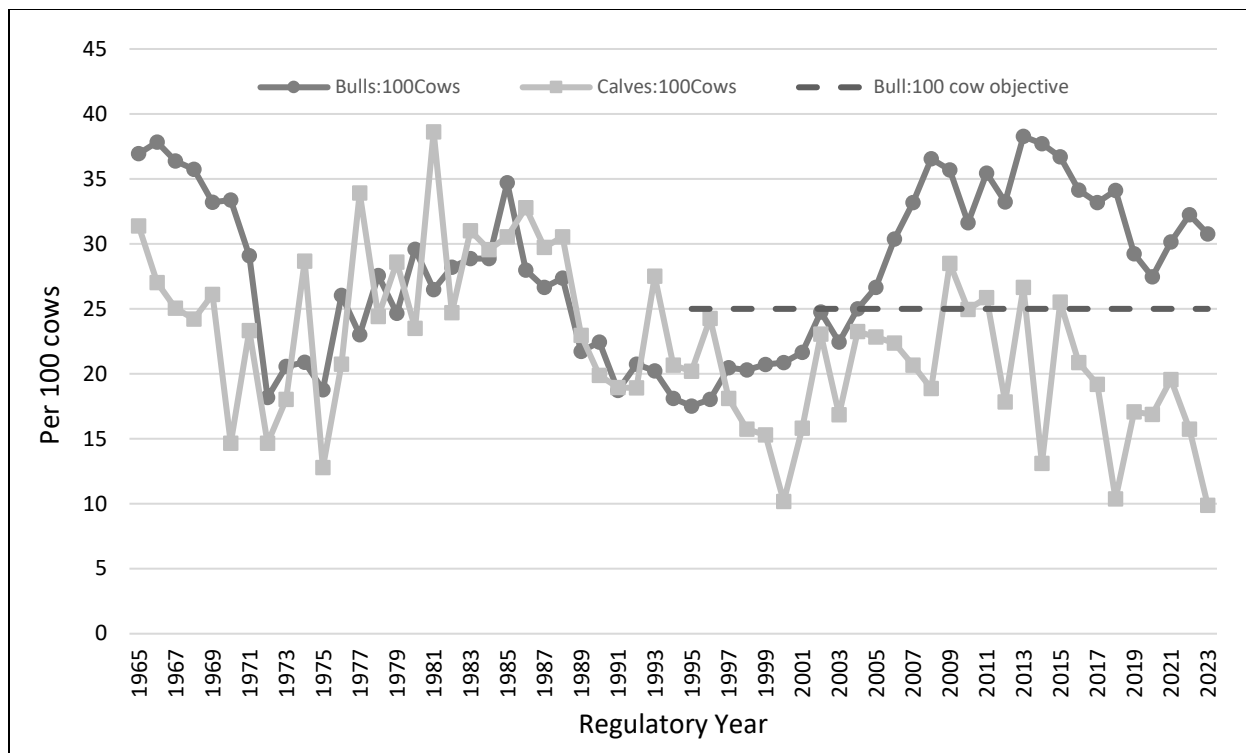


Figure 39-2. Moose composition ratios in Unit 13B, RY1967–2023.

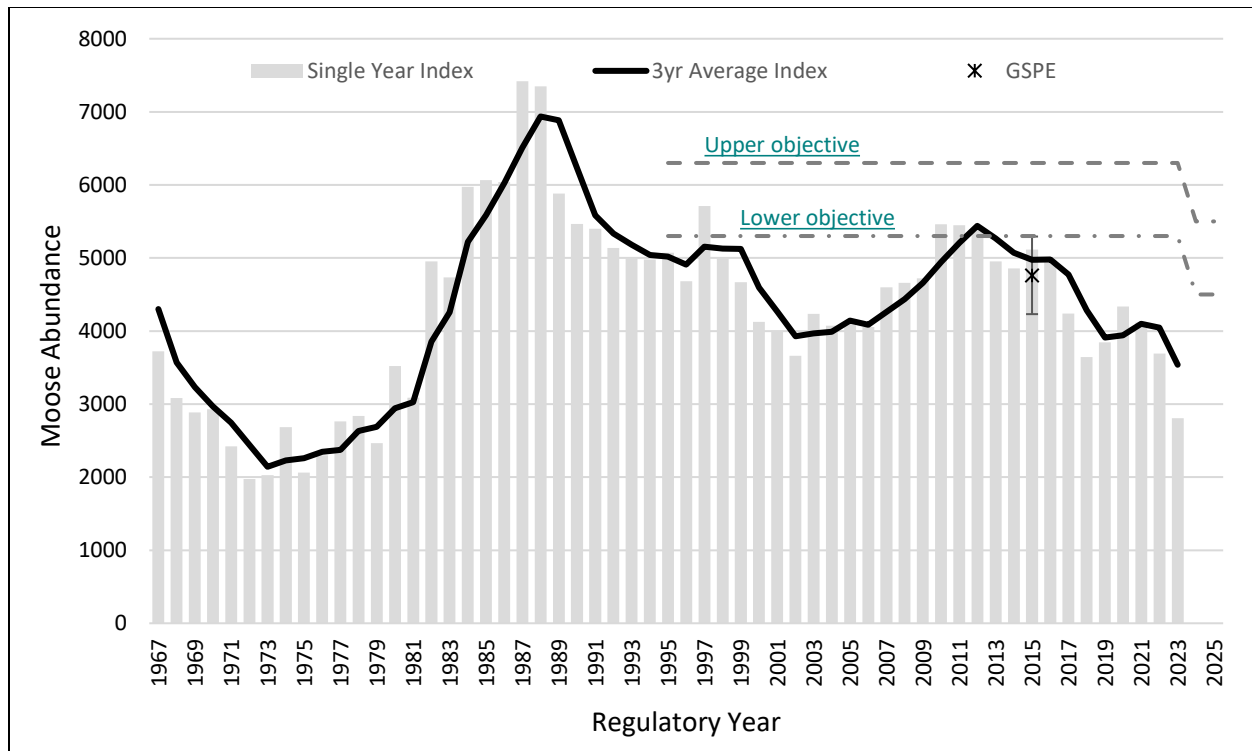


Figure 39-3. Moose abundance index and objectives in Unit 13B, RY1967–2023, and proposed objectives for RY2025.

Public comments and values should guide the ultimate objectives for moose abundance in Unit 13B, but biological evidence, such as long-term abundance indices from minimum population counts and measures of productivity, suggests that objectives should not be higher than 5,500 moose at this time. The proposed objectives represent roughly 1.4–1.8 moose per square mile of what is currently considered to be moose habitat in Unit 13B.

A more than 40-year history of harvest monitoring demonstrates that moose harvest in Unit 13B has oscillated through three peaks since 1978 which coincide with peaks in moose abundance (Figure 39-4). Prior to the harvest objectives being established, the lower end of the objectives had only ever been met in RY1986–1989. Since the objectives were established in 1995, the lower end has only ever been met in RY2016. The historic range of harvest in Unit 13B is 117–379 and the long-term average is 225. The proposed harvest objectives of 200–400 moose represent a roughly 4.3–6.8% harvest rate that the department believes is achievable.

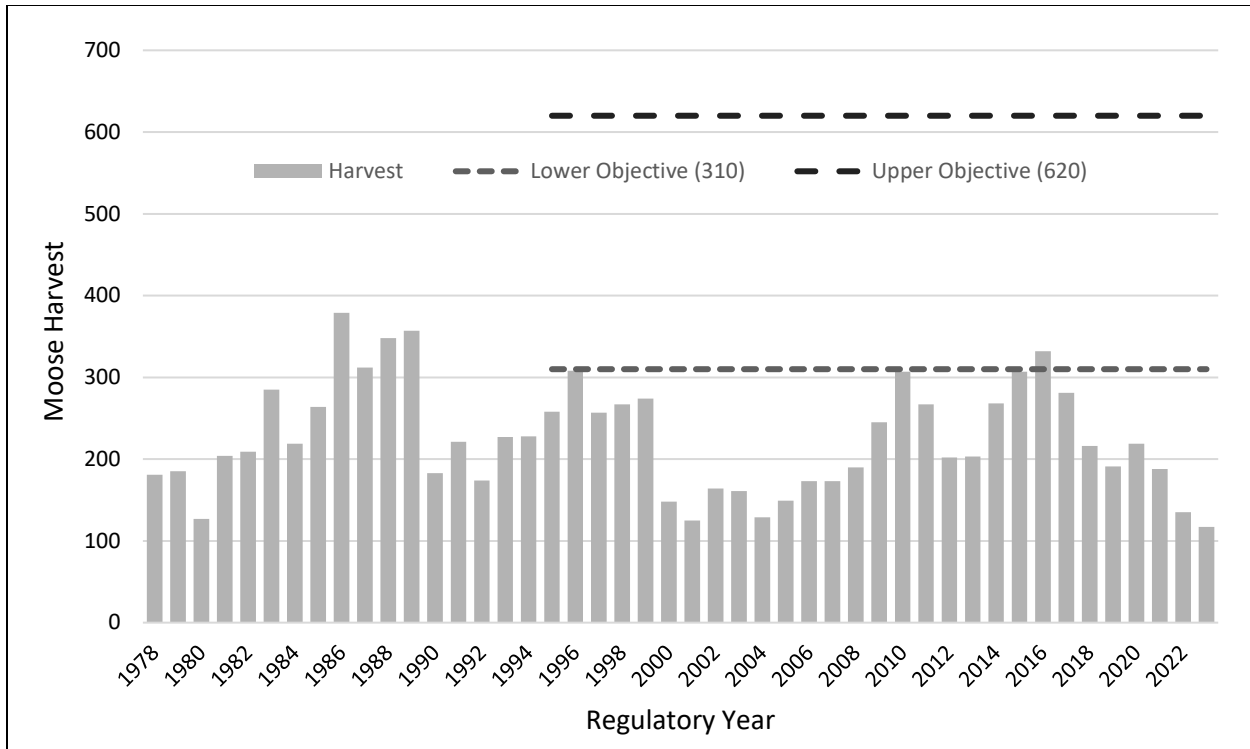


Figure 39-4. Moose harvest and objectives in Unit 13B, RY1967–2023.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** adjusting the abundance and harvest objectives for moose in Unit 13B. The proposed objectives would seek to stabilize the moose population below historic peaks that are most likely not sustainable. If populations are approaching or exceeding the upper end of the objectives, additional harvest will be necessary which could include additional management tools such as extended seasons, any-bull opportunity, and antlerless opportunity to maintain the population within objectives and to take advantage of surplus moose created by IM. Both proposed moose abundance and harvest are below the proposed objectives at this time, and the proposed change would not affect the current status of intensive management in Unit 13B.

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

PROPOSAL 40 - 5 AAC 92.108. Identified big game prey populations and objectives. Adjust abundance objectives for moose in Unit 13C.

PROPOSED BY: Copper Basin Advisory Committee

WHAT WOULD THE PROPOSAL DO? If adopted the intensive management objectives for moose abundance in Unit 13C would increase from a range of 2,000–3,000 moose to a range of 2,500–3,250 moose.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose.

5 AAC 92.108. Identified big game prey populations and objectives:

For purposes of implementing AS 16.05.255(e)–(g), the Board of Game has made the following findings on whether the listed big game prey populations, or portions of those populations, are identified as important for providing high levels of harvest for human consumptive use, and has established the following population and harvest objectives:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13C	Positive	2,000–3,000	155–350
....			

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted the midpoint of the abundance objectives would shift from 2,500 moose to 2,875 moose. This midpoint is relevant to Intensive Management (IM) thresholds outlined in 5 AAC 92.121; the Unit 13 IM program may be reviewed, modified, or suspended when the midpoint of the IM population and harvest objectives for the moose population are achieved. This midpoint of the abundance objective would also be relevant as a threshold for implementing antlerless moose harvest when moose abundance is relatively high.

BACKGROUND: Unit 13C has been included in an active IM program for moose in Unit 13 since regulatory year (RY) 2005. Historically, population trends in Unit 13C have been assessed through minimum count surveys in established Trend Count Areas (CAs). Minimum count and composition surveys have been conducted in these established CAs almost annually since 1965, providing a robust estimate of population composition after the hunting season, as well as reliable insights into overall population abundance trends through time. However, these surveys did not result in actual abundance estimates for the entire subunit.

The implementation of IM required population objectives be set for moose, however abundance estimates for moose have been a challenge to quantify in many areas. The original abundance objective for Unit 13C was set in RY1995 as 2,600–3,500 moose, which represented an objective of roughly 1.7–2.3 moose per square mile for what was considered available moose habitat at that time.

In 2013, the board chose to modify the Unit 13C moose abundance objectives from 2,600–3,500 to 2,000–3,000 moose but did not adopt any of the other proposed adjustments to harvest objectives for the subunit. The new objectives represented roughly 1.3–2.0 moose per square mile for what was considered available moose habitat at that time. Abundance estimates were derived in such a way that the midpoint of the new objectives could not be achieved even at historic high levels of observed moose densities for Unit 13C.

Despite discrepancies between abundance objectives and abundance estimate methodology, the department recognized that moose abundance was relatively high in Unit 13C according to the historic dataset of trend surveys, even if the abundance estimate at the time did not meet the new abundance objectives. As a result, wolf control in Unit 13C was suspended in RY2012 and RY2014–2017 during which time moose abundance grew to historic highs and potential overabundance (Figures 40-1 and 40-2).

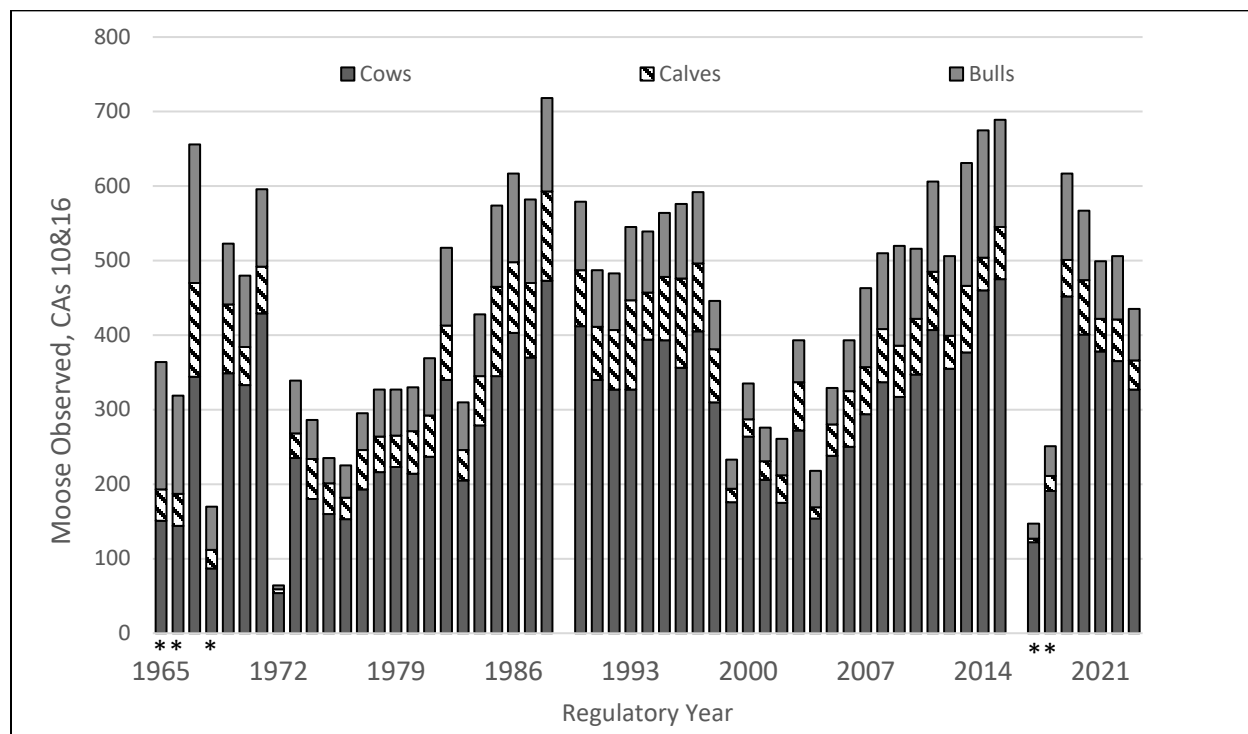


Figure 40-1. Minimum moose counts in Unit 13C trend count areas, RY1965–2023.

*Indicates years in which only one out of two count areas were surveyed.

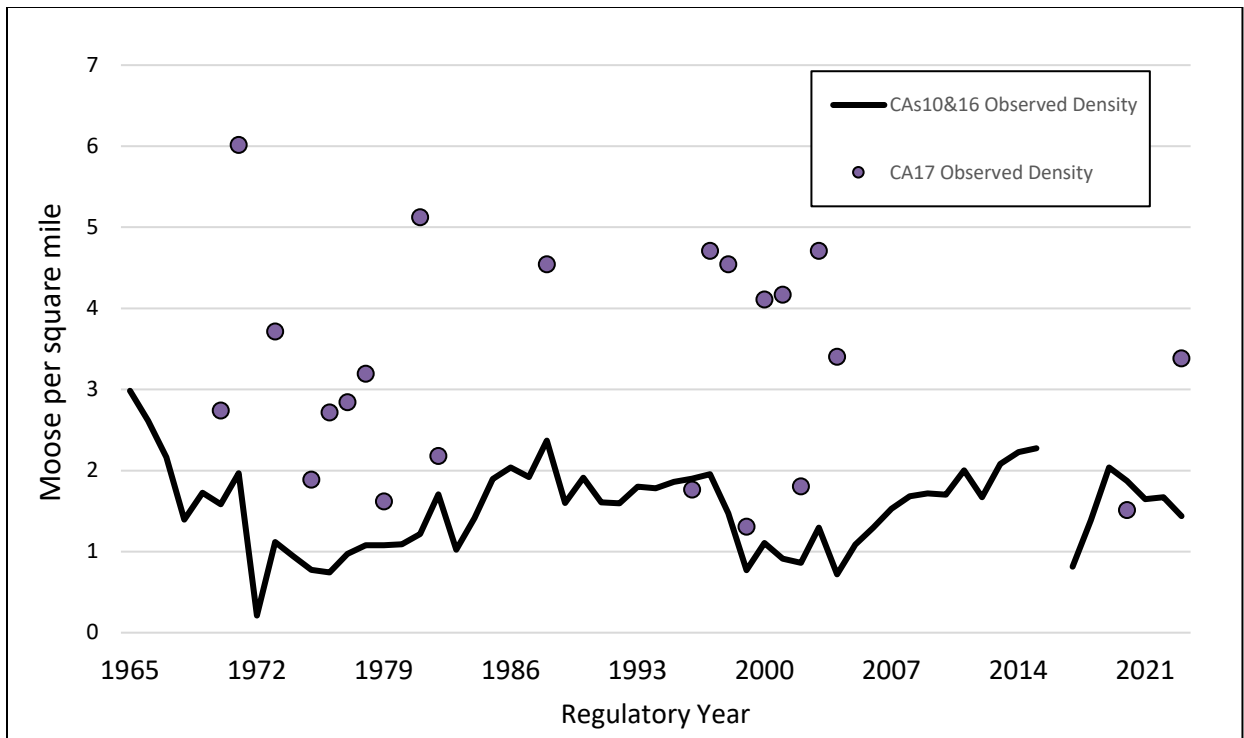


Figure 40-2. Observed moose densities in Unit 13C trend count areas, RY1965–2023.

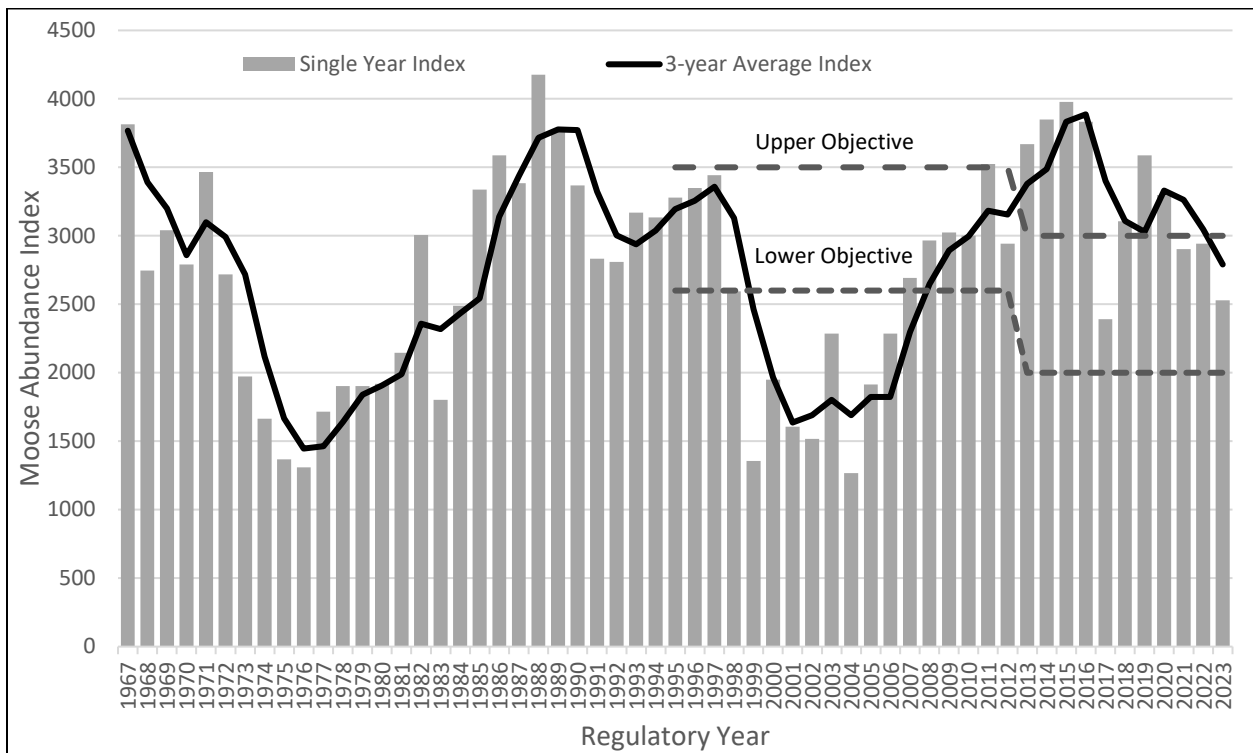


Figure 40-3. Moose abundance index and objectives in Unit 13C, RY1967–2023.

Moose trend count surveys in Unit 13C observed moose densities in 2019 that were similar to those in 2011, when the Copper Basin AC felt that an increase in wolf numbers, an increase in

moose harvest (cow harvest), and a stabilization of the moose population was appropriate. Since 2019, moose abundance in Unit 13C has declined as would be expected after a period of overabundance followed by three severe deep-snow winters in a row (2021/22, 2022/23, 2023/24). The latest moose abundance estimate from November 2023 is at the midpoint of the current objectives which is 2,500 moose. This represents a rough midpoint between historic lows and historic highs for this population. Due to moose trend count data naturally fluctuating from year to year even when a population is stable, the 3-year average is generally used to determine where a population stands in relation to the midpoint of the abundance objectives. The most recent 3-year average moose abundance index for Unit 13C is 2,792 moose. If moose numbers drop further in November of 2024, resulting in a decline in the 3-year average below 2,500, then wolf control will likely be implemented until numbers begin to increase again. At current or higher levels, wolf control is counter-indicated if cow harvest is not available to utilize extra moose on the landscape and help prevent overabundance.

The Copper Basin Advisory Committee reassessed the Unit 13C abundance objectives with the updated abundance indices at a public meeting on Saturday, April 6. They determined they would prefer moose abundance objectives be slightly higher than they are currently, proposing 2,500–3,250 moose as a new abundance estimate. This represents roughly 1.4–1.8 moose per square mile of estimated moose habitat (Figure 40-3).

The midpoint would be 2,875 moose, which is slightly above the current 3-year average. This would make wolf control a likely approach in Unit 13C for the winter of 2024/25 if moose numbers stay the same or decline.

Across all of the years that wolf control in Unit 13C has been active, 40% of wolves taken in those years were removed under the permitted same-day airborne program and the remaining 60% of wolves were harvested by hunters and trappers (Table 40-1).

Table 40-1. Wolf removal and harvest in Unit 13C, RY2001–2023.

Regulatory Year	Same-Day Airborne (SDA) Wolf Removal	Wolves Harvested Hunt/Trap/Snare	Total Wolves	% of wolves removed by SDA
2001	not authorized	26	26	-
2002	not authorized	18	18	-
2003	not authorized	21	21	-
2004	not authorized	11	11	-
2005	33	17	50	66%
2006	0	11	11	0%
2007	7	21	28	25%
2008	3	14	17	18%
2009	4	11	15	27%
2010	20	25	45	44%
2011	6	8	14	43%

2012	suspended	12	12	-
2013	9	9	18	50%
2014	suspended	20	20	-
2015	suspended	18	18	-
2016	suspended	25	25	-
2017	suspended	15	15	-
2018	13	24	37	35%
2019	suspended	13	13	-
2020	suspended	14	14	-
2021	suspended	3	3	-
2022	suspended	15	15	-
2023	suspended	32	32	-

DEPARTMENT COMMENTS: The department **SUPPORTS** adjusting the population objectives for moose in Unit 13C because data indicates the proposed objectives can be met without creating a conservation concern for the population. If populations are approaching the upper end or are exceeding the upper end of the objectives, additional harvest will be necessary, including antlerless opportunity to maintain the population within objectives and to take advantage of surplus moose created through IM. If adopted this proposal will not result in cessation of IM operations in Unit 13C.

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

PROPOSAL 41 - 5 AAC 92.108. Identified big game prey populations and objectives. Reduce harvest objectives for moose in Unit 13C.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? If adopted the intensive management harvest objectives for moose in Unit 13C would be reduced from a range of 155–350 moose to a range of 80–200 moose.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose.

5 AAC 92.108. Identified big game prey populations and objectives:

For purposes of implementing AS 16.05.255(e) – (g), the Board of Game has made the following findings on whether the listed big game prey populations, or portions of those populations, are

identified as important for providing high levels of harvest for human consumptive use, and has established the following population and harvest objectives:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13C	Positive	2,000–3,000	155–350
....			

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted, then the harvest objectives for Unit 13C would be realistically achievable in Unit 13C based on available harvest data.

BACKGROUND: Unit 13C has been included in an intensive management program for moose in Unit 13 since regulatory year (RY) 2005. A more than 40-year history of harvest monitoring demonstrates that moose harvest in Unit 13C has oscillated through 2–3 peaks since 1978 which coincide with peaks in moose abundance (Figure 41-1).

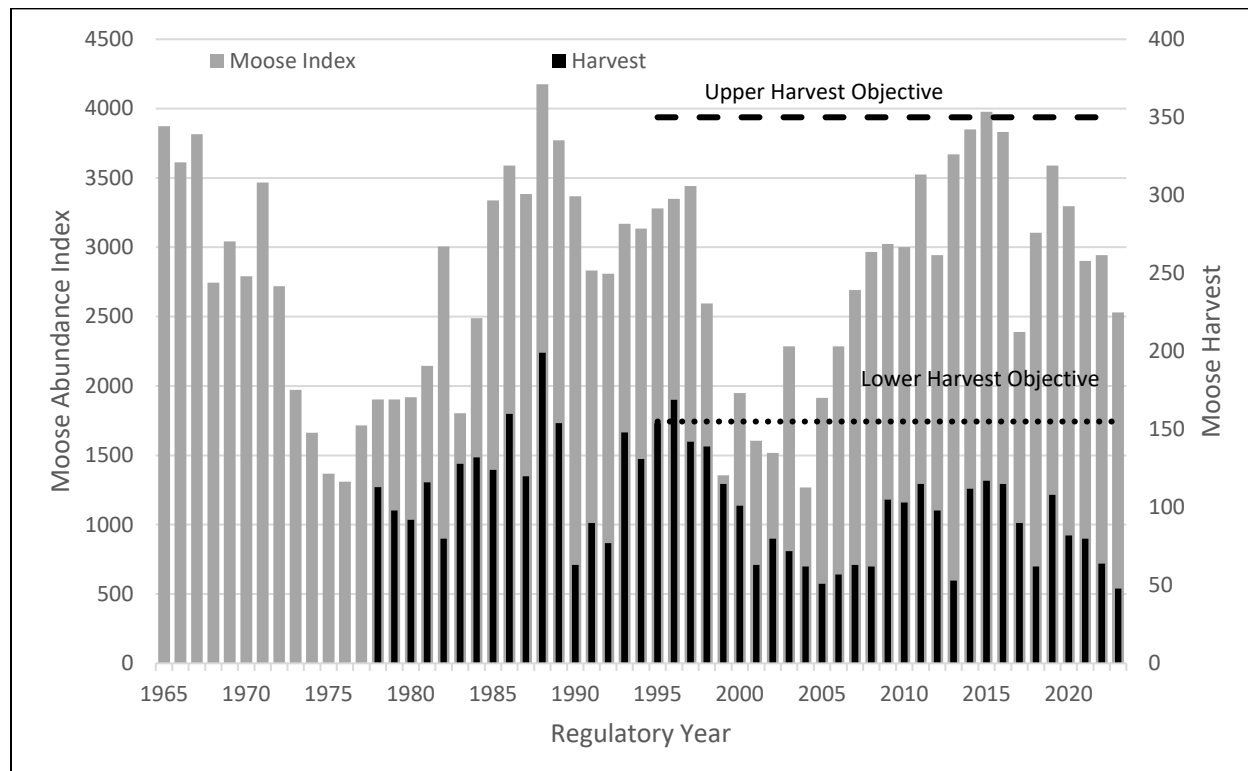


Figure 41-1. Moose harvest, harvest objectives, and abundance indices in Unit 13C, RY1965–2023.

Reported harvest numbers are available since 1978; since then the minimum harvest objective of 155 has only been achieved in 3 single years. The current harvest objectives for Unit 13C are not attainable. Furthermore, the current harvest objectives of 155–350 moose represents roughly 7.2%–10.4% of the current moose population objectives, which is not a reasonable or sustainable goal, especially without the ability to reliably offer cow harvest opportunity when the Unit 13C moose population demonstrates high abundance and/or productivity. The proposed harvest objectives of 80–200 moose includes the long-time average harvest of 102 moose and also reflects harvest levels reported in recent years when moose abundance was at a sustainable level, but cow harvest opportunity was not available. The historic range of moose harvest in Unit 13C is 51–199. The proposed harvest objectives would represent a harvest rate of roughly 3.8%–6.3%.

Since implementation of wolf control in Unit 13C in RY2005, wolf control efforts have been activated 9 of the past 19 years, but the opportunity to take advantage of additional moose made available for harvest has only been available for 1 year (Table 41-1). As noted in Table 41-1 the antlerless moose hunt was only available in RY2023. Current moose harvest objectives in Unit 13C cannot be achieved with the existing bull-only harvest opportunities, even when moose abundance grows to peak levels with declines in wolf abundance. Additional tools to increase harvest include extended seasons, any-bull hunts, and antlerless moose hunts.

Table 41-1. Wolf removal, wolf harvest, moose harvest, and moose abundance in Unit 13C, RY2001–2023.

Regulatory Year	Same-Day Airborne (SDA) Wolf Removal	Wolves Harvested Hunt/Trap/Snare	Total Wolves	% of wolves removed by SDA	Bull Moose Harvested ¹	Cow Moose Harvested ¹	3-year Average Moose Index
2001	not authorized	26	26	0%	63	0	1,636
2002	not authorized	18	18	0%	80	0	1,690
2003	not authorized	21	21	0%	72	0	1,803
2004	not authorized	11	11	0%	62	0	1,690
2005	33	17	50	66%	51	0	1,822
2006	0	11	11	0%	57	0	1,822
2007	7	21	28	25%	63	0	2,297
2008	3	14	17	18%	62	0	2,648
2009	4	11	15	27%	105	0	2,894
2010	20	25	45	44%	102	1	2,997
2011	6	8	14	43%	115	0	3,183
2012	Suspended	12	12	0%	97	1	3,156

2013	9	9	18	50%	52	1	3,379
2014	Suspended	20	20	0%	117	3	3,488
2015	Suspended	18	18	0%	116	1	3,833
2016	Suspended	25	25	0%	114	1	3,887
2017	Suspended	15	15	0%	90	0	3,400
2018	15	24	39	38%	60	2	3,110
2019	Suspended	13	13	0%	108	0	3,028
2020	Suspended	14	14	0%	82	0	3,331
2021	Suspended	3	3	0%	78	2	3,263
2022	Suspended	15	15	0%	61	3	3,047
2023	Suspended	32	32	0%	51	3 ²	2,792

¹ Includes ceremonial harvest.

² The only cow harvest opportunity aside from ceremonial harvest in Unit 13C was offered in RY2023.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** adjusting the harvest objectives for moose in Unit 13C to objectives that are realistically achievable given biological and social constraints as well as historic harvest history for moose in the area. The current harvest objectives are not achievable under the existing hunt structure. Even if harvest objectives are achieved with these new objectives, wolf control would still be activated or suspended based on moose abundance in Unit 13C. If populations are approaching or exceeding the upper end of the objectives additional harvest will be necessary which could include additional management tools such as extended seasons, any-bull opportunity, and antlerless opportunity to maintain the population within objectives and to take advantage of surplus moose created by IM.

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

PROPOSAL 42 - 5 AAC 92.108. Identified big game prey populations and objectives. Reduce harvest objectives for moose in Unit 13E.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? If adopted the intensive management objectives for moose harvest in Unit 13E would be reduced from a range of 300–600 moose to a range of 150–300 moose.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose.

5 AAC 92.108. Identified big game prey populations and objectives:

For purposes of implementing AS 16.05.255(e) – (g), the Board of Game has made the following findings on whether the listed big game prey populations, or portions of those populations, are identified as important for providing high levels of harvest for human consumptive use, and has established the following population and harvest objectives:

Population	Finding	Population Objective	Harvest Objective
...			
Moose			
...			
GMU 13E	Positive	5,000–6,000	300–600
....			

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted, then the harvest objectives for Unit 13E would be realistically achievable given the long history of moose harvest in Unit 13E.

BACKGROUND: Unit 13E has been included in an intensive management program for moose in Unit 13 since regulatory year (RY) 2001. A more than 40-year history of harvest monitoring demonstrates that moose harvest in Unit 13E has oscillated through 2 peaks since 1978 which coincide with peaks in moose abundance (Figure 24-1). The only year in which the lower harvest

objective was achieved was in 1988, when 303 moose were harvested. The historic range of harvest in Unit 13E is 86–303 moose. The current harvest objectives for Unit 13E cannot be achieved with the existing bull-only harvest opportunities. The proposed harvest objectives for Unit 13E of 150–300 moose are based on the long-time average of 176 moose. These new harvest objectives would represent a roughly 2.9%–4.8% harvest rate when compared with the moose abundance objectives for Unit 13E.

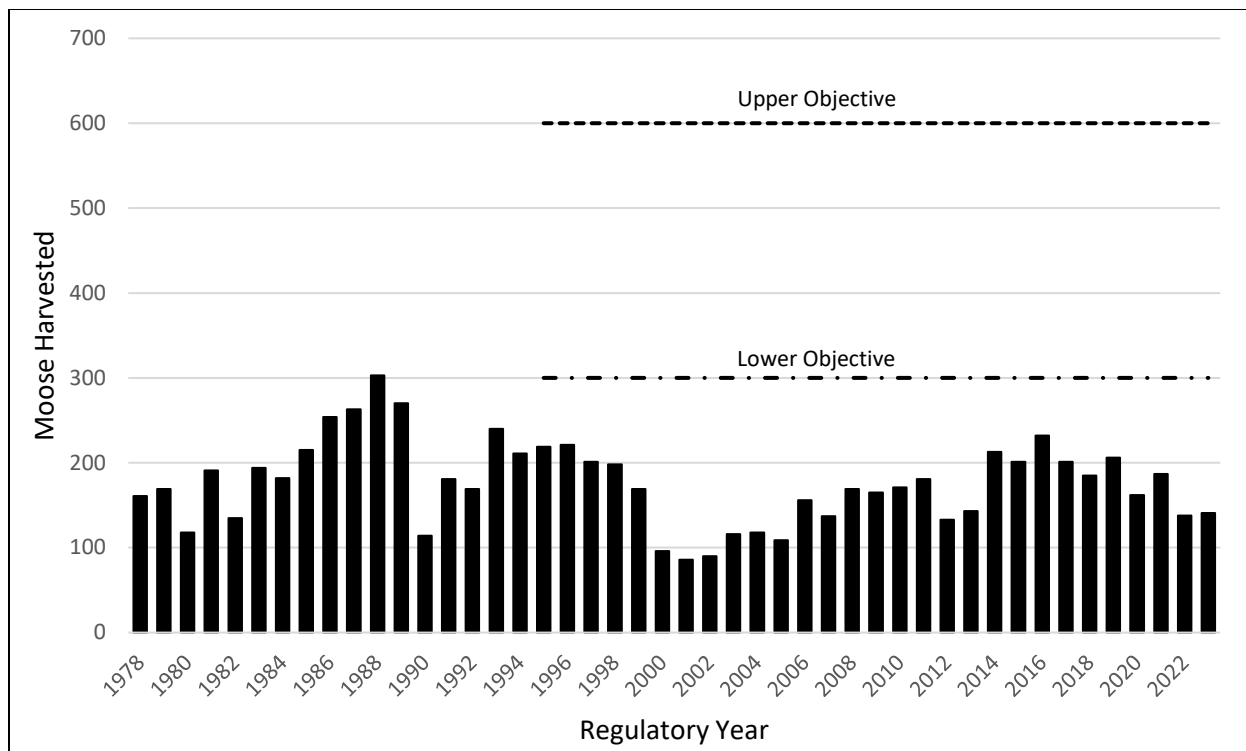


Figure 42-1. Moose harvest and objectives in Unit 13E, RY1978–2023.

Since implementation of wolf control in Unit 13E in RY2003, wolf control efforts have been activated 12 of the past 21 years, but the opportunity to take advantage of additional moose made available for harvest has only been available for 1 year (Table 42-1). As noted in Table 41-1 the antlerless moose hunt was only available in RY2023. Current moose harvest objectives in Unit 13E cannot be achieved with the existing bull-only harvest opportunities, even when moose abundance grows to peak levels with declines in wolf abundance. Additional tools to increase harvest include extended seasons, any-bull hunts, and antlerless moose hunts.

Table 42-1. Wolf removal, wolf harvest, moose harvest, and moose abundance in Unit 13E, RY2001–2023.

Reg Year	Same-Day Airborne (SDA) Wolf Removal	Wolves Harvested Hunt/Trap/ Snare	Total Wolves	% of wolves removed by SDA	Bull Moose Harvested ¹	Cow Moose Harvested ¹	3-year Average Moose Index
2001	-	66	66	0%	86	0	4,630
2002	-	42	42	0%	90	0	-
2003	43	27	70	61%	116	0	-

2004	26	23	49	53%	118	0	-
2005	9	13	22	41%	109	0	-
2006	13	5	18	72%	156	0	-
2007	14	6	20	70%	137	0	-
2008	35	14	49	71%	169	0	4,459
2009	10	14	24	42%	165	0	4,601
2010	45	3	48	94%	171	0	4,816
2011	25	14	39	64%	181	0	5,022
2012	Suspended	14	14	0%	133	0	5,476
2013	25	12	37	68%	142	1	5,791
2014	Suspended	9	9	0%	211	2	6,067
2015	Suspended	2	2	0%	200	1	6,081
2016	Suspended	14	14	0%	232	0	6,097
2017	Suspended	13	13	0%	201	0	6,213
2018	47	12	59	80%	185	0	6,258
2019	Suspended	23	23	0%	206	0	6,377
2020	Suspended	20	20	0%	162	0	6,334
2021	Suspended	9	9	0%	186	1	6,297
2022	Suspended	20	20	0%	138	0	5,935
2023	59	13	72	82%	140	2 ²	5,477

¹ Includes ceremonial harvest.

² The only cow harvest opportunity aside from ceremonial harvest in Unit 13E was offered in RY2023.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** adjusting the harvest objectives for moose in Unit 13E to objectives that are realistically achievable given biological and social constraints as well as historic harvest history for moose in the area. The current harvest objectives are not achievable under the existing hunt structure. Implementation of wolf control in Unit 13E would still be based on moose abundance in relation to abundance objectives in Unit 13E.

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

PROPOSAL 43 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish an antlerless moose season in Unit 13A.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would reestablish a resident-only draw hunt in Unit 13A with a bag limit of 1 antlerless moose and season dates of October 1–October 31; up to 200 permits may be issued and take of a calf or a cow accompanied by a calf would be prohibited.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations in Unit 13 adhere to Alaska State Constitution and AS 16.05.258 and can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*. The Community Subsistence Hunt (CSH) harvest area is defined in 5 AAC 92.074(d)

The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- **CM300** - Copper Basin CSH:
 - The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.
 - CM300 permitholders not in possession of an any-bull locking tag have a bag limit of 1 moose with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least 1 side, with the same season dates.
 - Once the 100 any-bull allocation has been met, the bag limit is changed for all CSH participants by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines.
 - 350 CSH participants receive any-bull locking tags based on Tier II scoring criteria. Each community group must have 25 qualified individuals to successfully apply for any CSH program, and Copper Basin CSH groups are locked-in for a two-year commitment upon successful application.
 - Any eligible hunter within a group may act as a designated hunter for other members of the group.
 - Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
 - Meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.
 - The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.
 - No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Subsistence Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.

- After the CSH hunt has ended, unsuccessful individual household members may then acquire state or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- **GM000** - Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
- **DM348** - Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
- **DM335–339** - Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.
- **FM1301** - Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In regulatory year (RY) 2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board to state hunting of moose and caribou.
- **Federal Community Hunt:** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal would provide additional harvest opportunity to Alaska residents as well as a management tool for the department to maintain a sustainable moose population in Unit 13A.

BACKGROUND: Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use requires additional tools to increase harvest to take advantage of additional moose made available through IM efforts, which also aids in preventing moose populations from exceeding carrying capacity and causing habitat damage. Unit 13A has a history of successful sustainable antlerless harvest incorporated into the harvest strategy with relatively high overall productivity and harvest rate for the population since 2012.

For Unit 13A an antlerless hunt was initially adopted with a September 1–20 season by the Board of Game in March 2011, and the first Unit 13A antlerless hunt under this regulation took place in September 2012 (DM325). The hunt was modified when the Board of Game shifted the fall season

to October and added a March season during the February 2013 board meeting. The March season, however, allowed for the harvest of antlerless bulls, which is contrary to the intent of providing cow harvest opportunity.

Upon inception of DM325, the department purposefully limited the number of permits issued annually as was discussed with the public, even though a higher rate of cow harvest was desirable to regulate the moose population within objectives (Table 43-1). After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to 1 percent of the cow population when the moose population is above the midpoint of the population objective for the subunit. The hunt area for the antlerless hunt was restricted to the western half of Unit 13A (west of Lake Louise Road), which maintains higher moose densities than the eastern half of Unit 13A.

Table 43-1. Antlerless moose permits and total harvest in Unit 13A, RY2012–2023.

Regulatory Year	DM325 Permits	DM325 Harvest		Other Harvest ^a		Total Harvest	1% of Estimated Cows in 13A	Estimated Overall Harvest Rate
		Cows	Bulls	Cows	Bulls			
2012	10	4	0	3	230	237	29	5%
2013	10	2	0	1	260	263	30	6%
2014	10	4	3	0	255	262	27	6%
2015	10	7	0	1	333	341	30	7%
2016	10	5	0	3	311	319	28	7%
2017	10	6	2	4	318	330	23	7%
2018	10	7	0	0	246	253	28	6%
2019	10	8	2	0	271	281	27	7%
2020	20	16	0	1	272	289	25	7%
2021	25	22	0	1	264	287	32	7%
2022	25	19	1	3	235	258	24	6%
2023	20	15	1	7	156	179 ^b	27	5%

^a Other harvest includes all other hunts and ceremonial harvest.

^b Moose hunter numbers declined with the closure of caribou seasons in Unit 13 and hunters reported unusually difficult hunting conditions, including stormy weather and late leaf drop.

The current population objective for Unit 13A is 3,500–4,200 moose with a harvest objective of 210–420 moose, which represents a harvest rate of roughly 6%–9%. Moose abundance indices are derived from annual minimum trend counts, which can vary from year to year even when a population is stable (Figure 43-1). To address this variation the 3-year average moose abundance index is typically used to determine subunit status in relation to the midpoint of the population objectives (Figure 43-2). If the 3-year average is above the midpoint of the objective, a conservative approach is taken to determine the number of antlerless permits to be issued. This is

based off the most recent one-year moose abundance index (if the most recent index is lower than the 3-year average the number of permits issued reflects the lower number).

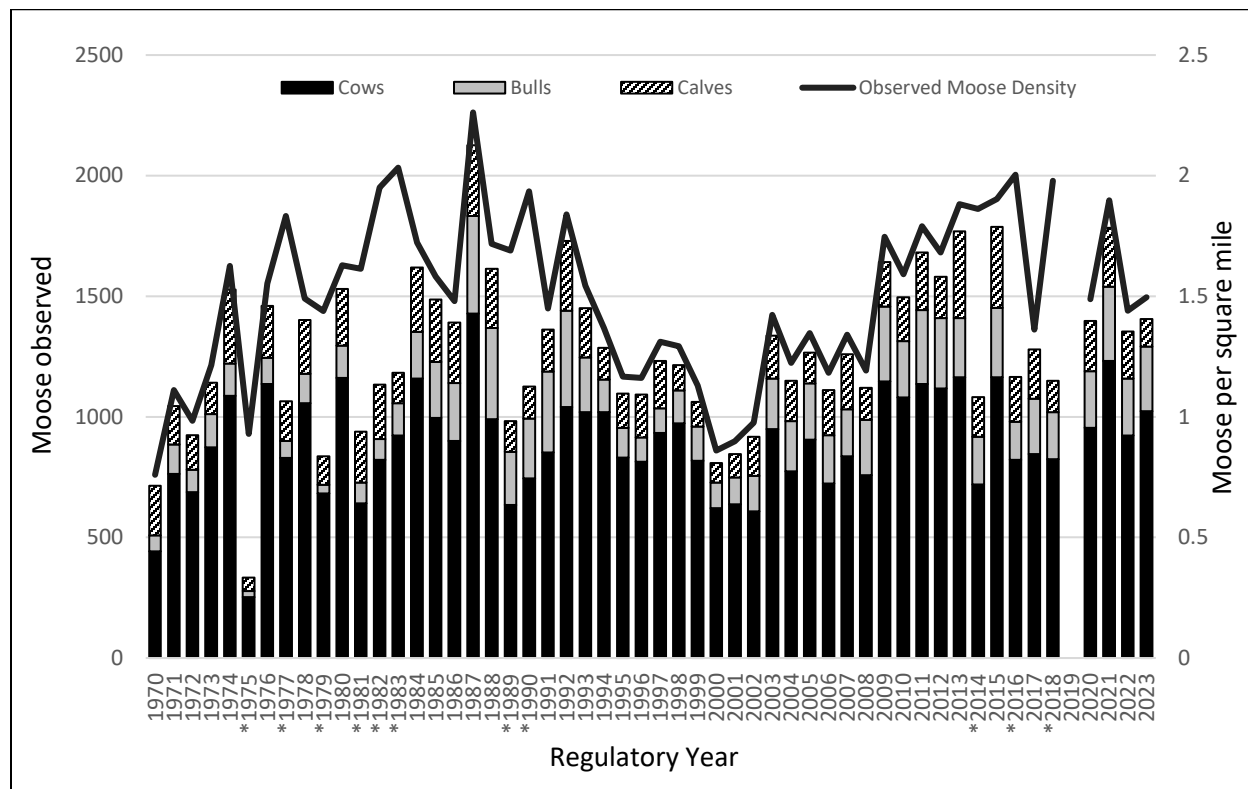


Figure 43-1. Moose minimum counts and observed density in western Unit 13A, RY1965–2023. Years with only one out of two count areas surveyed denoted by *.

In February of 2024 the Copper Basin Advisory Committee (AC) voted not to reauthorize the Unit 13A antlerless hunt, in contrast to previous years of AC support and contrary to a department update that supported the sustainability of the hunt and noted the high abundance of the moose population in Unit 13A. Twenty DM325 antlerless permits had been announced for Unit 13A for RY2024. While reported hunter effort and harvest success has declined in Unit 13A in conjunction with caribou hunt closures and reportedly difficult moose hunting conditions, population data for moose in Unit 13 continue to support the opportunity for cow harvest (Figures 43-2 and 43-3).

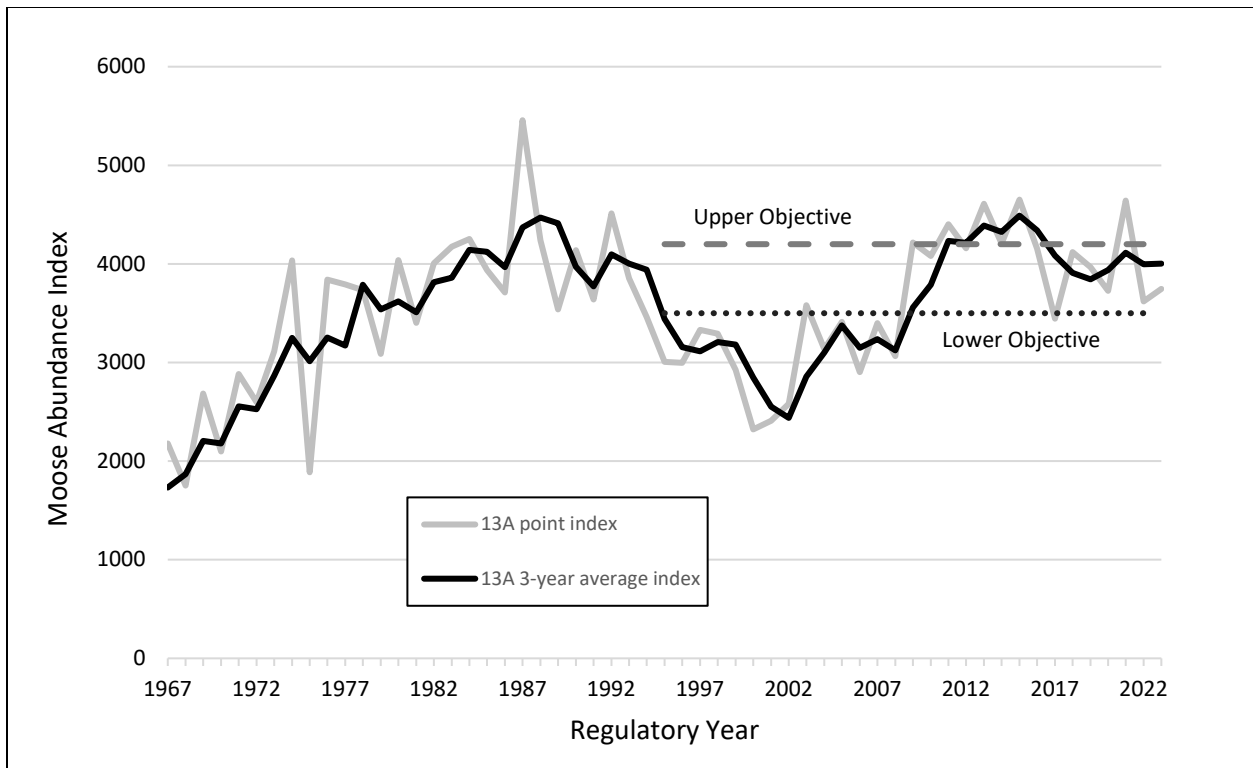


Figure 43-2. Moose population index in Unit 13A, RY1967–2023.

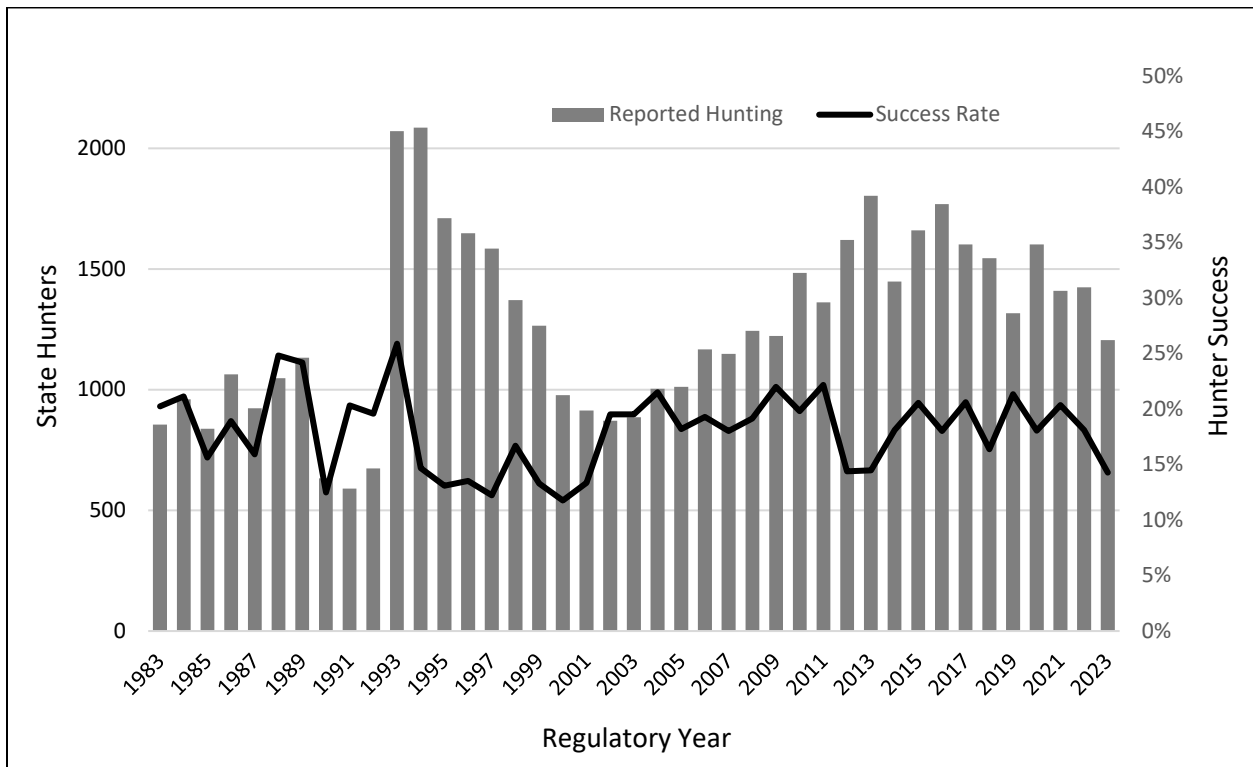


Figure 43-3. Moose hunters and success rate in Unit 13A, RY1983–2023.

The additional harvest provided through antlerless hunts can assist in achieving the harvest objectives for the population. Conservative cow moose harvest should be implemented when a population is within objectives, with the goal of stabilizing the population, before a population reaches or exceeds the higher objective. Cow moose harvest also allows for an increase in bull moose harvest in the same area to maintain bull-to-cow ratios near the objective of 25 bulls per 100 cows.

If antlerless moose hunting opportunities are not available in Unit 13A, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to establish an antlerless hunt opportunity in regulation to provide a management tool to stabilize moose populations within objectives while also providing additional harvest opportunity when moose abundance is within intensive management objectives. Antlerless moose hunts are a tool that can be used to aid in achieving management objectives for abundance, sex ratios, and harvest of moose populations. Unit 13A has a proven history of sustaining antlerless moose harvest in conjunction with moose abundance remaining stable within objectives in recent years. In the past, this hunt has been managed to achieve up to 1% of the estimated cow population of Unit 13A based on guidance from the board. In years of high productivity when wolf densities are low additional cow harvest may be necessary to effectively stabilize the moose population within the population objectives.

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

PROPOSAL 44 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish an antlerless moose season in Unit 13C.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would reestablish a resident-only draw hunt in Unit 13C with a bag limit of 1 antlerless moose and season dates of October 1–October 31; up to 100 permits may be issued and take of a calf or a cow accompanied by a calf would be prohibited.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations in Unit 13 adhere to Alaska State Constitution and AS 16.05.258 and can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*. The Community Subsistence Hunt (CSH) harvest area is defined in 5 AAC 92.074(d)

The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- **CM300** - Copper Basin CSH:
 - The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.
 - CM300 permitholders not in possession of an any-bull locking tag have a bag limit of 1 moose with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least 1 side, with the same season dates.
 - Once the 100 any-bull allocation has been met, the bag limit is changed for all CSH participants by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines.
 - 350 CSH participants receive any-bull locking tags based on Tier II scoring criteria. Each community group must have 25 qualified individuals to successfully apply for any CSH program, and Copper Basin CSH groups are locked-in for a two-year commitment upon successful application.
 - Any eligible hunter within a group may act as a designated hunter for other members of the group.
 - Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
 - Meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.
 - The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.
 - No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Subsistence Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.
 - After the CSH hunt has ended, unsuccessful individual household members may then acquire state or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- **GM000** - Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.

- **DM348** - Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
- **DM335–339** - Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.
- **FM1301** - Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In regulatory year (RY) 2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board to state hunting of moose and caribou.
- **Federal Community Hunt:** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal would provide additional harvest opportunity to Alaska residents as well as a management tool for the department to maintain a sustainable moose population in Unit 13C.

BACKGROUND: Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use requires additional tools to increase harvest to take advantage of additional moose made available through IM efforts, which also aids in preventing moose populations from exceeding carrying capacity and causing habitat damage.

In recent history cow harvest opportunity has only been offered for Unit 13A, despite moose populations in other subunits meeting abundance objectives. After considering a proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough antlerless permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit. At that time the only Unit 13 antlerless hunt in regulation applied to Unit 13A. In January of 2022 the Board of Game adopted an antlerless hunt for Unit 13C with an October season, and the first hunt under this regulation took place in October 2023 (DM327).

Upon inception of DM327, the department issued a limited number of permits due to uncertainty regarding the status of the moose population in Unit 13C following unusually severe winters with deep snow in RY2021 and RY2022 (Table 44-1). Subsequent moose surveys revealed that the Unit 13C moose population was not severely impacted by the deep snow winters of 2021/22 or 2022/23, which suggests that the population abundance during that time was at a sustainable level to avoid excessive starvation through severe winter conditions. The Unit 13C population, however, had recently peaked above objectives in RY2015 and had declined to a lower level before the severe winters occurred (Figure 44-1). Furthermore, this population has shown an overall declining trend in calf:cow ratios since RY2006 despite active wolf control during much of that time, which is a trend that is expected as density dependent factors impact the productivity of the population (Figure 44-2). This evidence supports the suggestion that the peak in abundance was not ideal, the higher objective should be below such a peak, and the population will likely be more productive if stabilized around the lower abundance observed in RY2021–2023, which corresponds with abundance levels observed RY2007–2010. These levels are at, or just above the higher abundance objective that was established in 2013, and within the abundance objectives that were previously in place from RY1995–2011; both sets of objectives indicate that cow harvest is appropriate at the current abundance level.

In February of 2024 the Copper Basin Advisory Committee (AC) voted not to reauthorize the Unit 13C antlerless hunt, contrary to a department update that supported the sustainability of the hunt and the relatively high abundance of the moose population in Unit 13C. Fifteen DM327 antlerless permits had been announced for Unit 13C for RY2024.

Table 44-1. Antlerless moose permits and total harvest in Unit 13C, RY2012–2023.

Regulatory Year	DM327 Permits	DM327 Harvest			Total Harvest	1% of Estimated Cows in 13C	Estimated Overall Harvest Rate
		Cows	Cows	Bulls			
2012	n/a	-	1	97	98	21	3%
2013	n/a	-	1	52	53	22	2%
2014	n/a	-	3	117	120	27	3%
2015	n/a	-	1	116	117	28	3%
2016	n/a	-	1	114	115	10	3%
2017	n/a	-	0	90	90	17	3%
2018	n/a	-	2	60	62	21	2%
2019	n/a	-	0	108	108	26	3%
2020	n/a	-	0	82	82	23	2%
2021	n/a	-	2	78	80	22	2%
2022	n/a	-	3	61	64	21	2%
2023	10	0	3	50	53 ^b	19	2%

^a Other harvest includes ceremonial harvest.

^b Moose hunter numbers have declined and hunters reported unusually difficult hunting conditions, including stormy weather and late leaf drop, and harvest was similar to that achieved in RY2013 when moose abundance was near record highs.

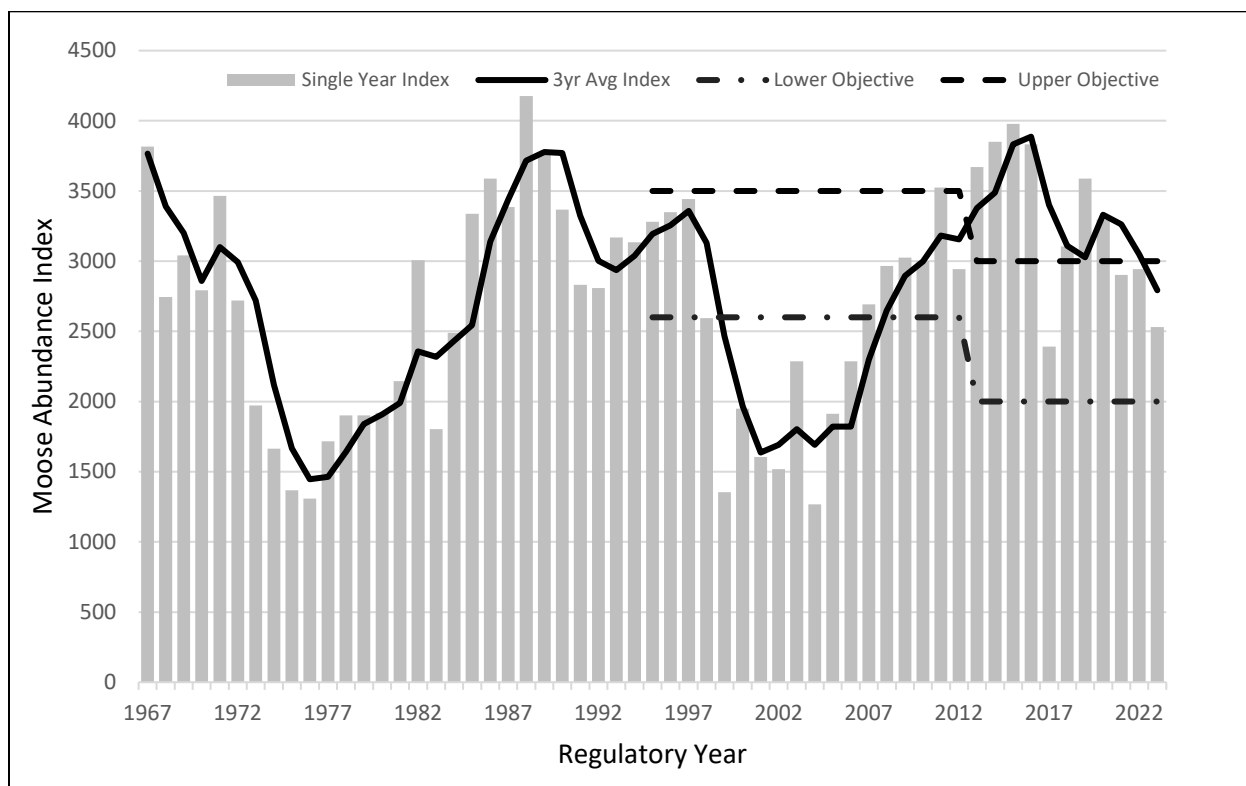


Figure 44-1. Moose abundance index in Unit 13C, RY1967–2023.

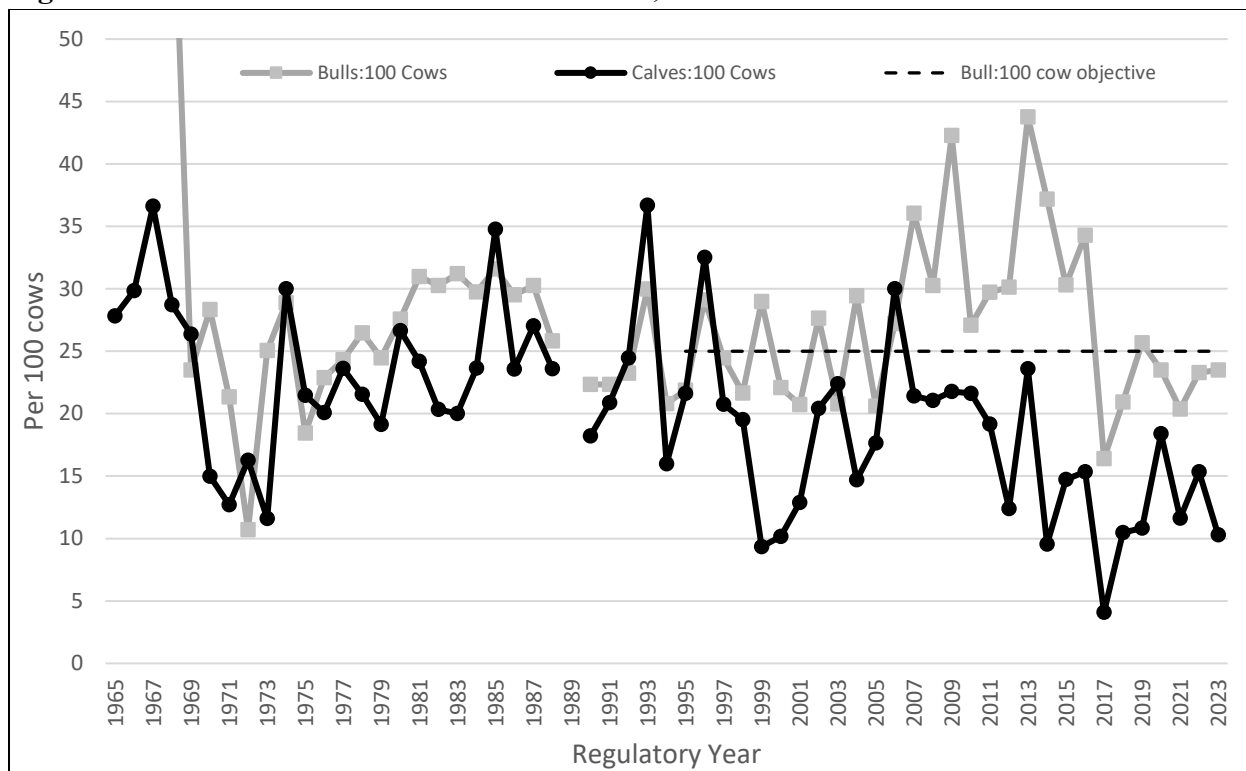


Figure 44-2. Moose composition ratios in Unit 13C, RY1967–2023.

The current population objective for Unit 13C was implemented in RY2013 as 2,000–3,000 moose with a harvest objective of 155–350 moose which represents a harvest rate of roughly 7.2%–10.4%. The previous population objective was 2,600–3,500 (RY1995–2012) with a harvest objective of 155–350 moose, which represents a harvest rate of roughly 5.6%–9.1%. The population objective in Unit 13C was modified in 2013 based on a proposal that was submitted to the Board of Game by the Copper Basin Advisory Committee (AC).

Moose counts at that time were near historic highs; moose counts have been very similar in recent years to those during the time the 2013 AC proposal was submitted but cow harvest opportunity was not implemented until RY2023 (Figures 44-3 and 44-4). As such, wolf control has been suspended in Unit 13C since RY2019 due to high moose counts.

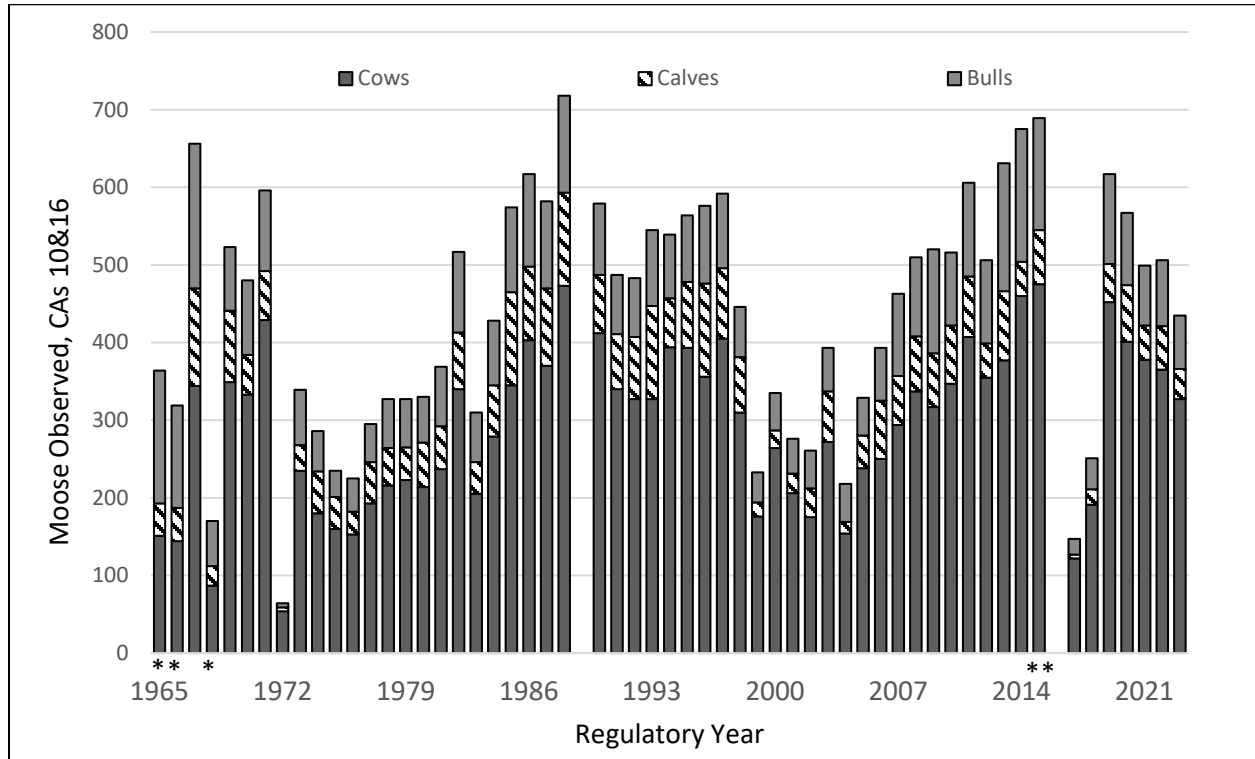


Figure 44-3. Minimum moose counts in Unit 13C trend count areas, RY1965–2023.

*Indicates years in which only one out of two count areas were surveyed.

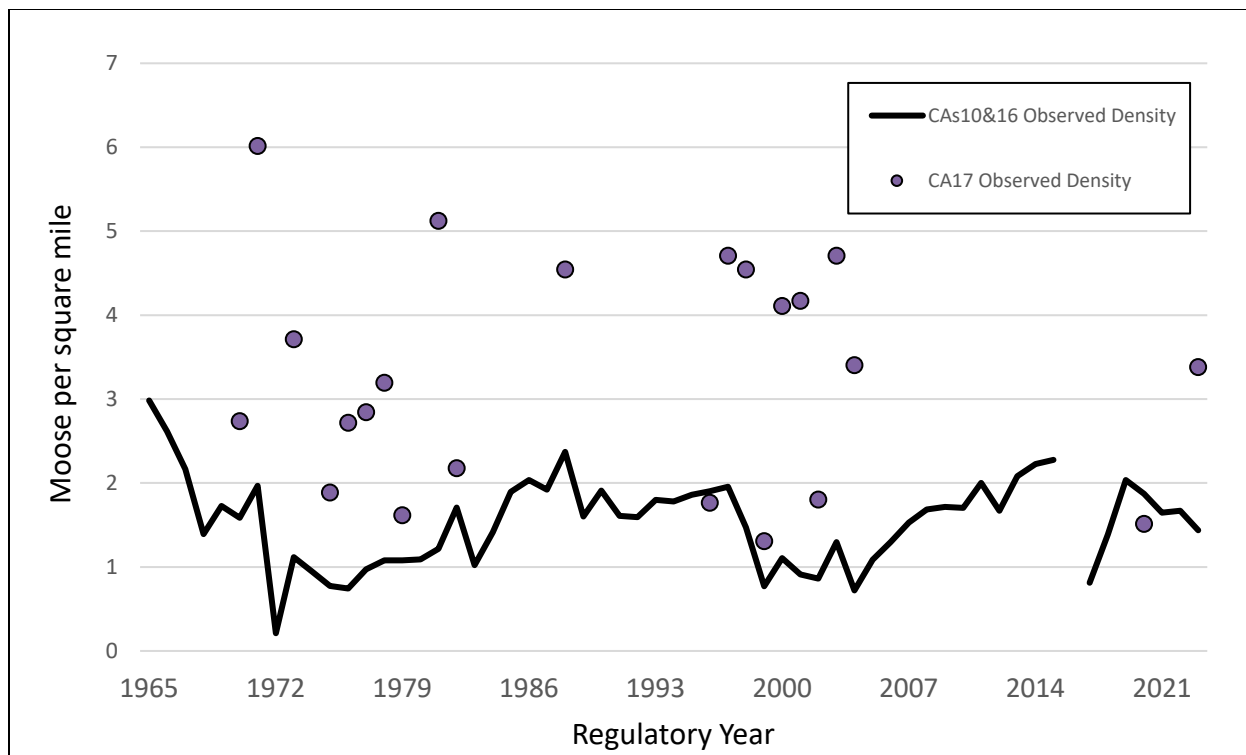


Figure 44-4. Observed moose densities in Unit 13C trend count areas, RY1965–2023.

Despite minimum moose counts near historic highs in RY2011 and RY2013, the new lower objective that was established in 2013 remained above the RY2011 and RY2013 moose estimates for Unit 13C that were utilized at that time.

Under sustained yield principles, higher objectives should be below historic highs of abundance if it is believed that those historic highs and subsequent declines represent growth that exceeded carrying capacity, as is the case for Unit 13C, and as is supported by the AC comments from 2013. As such, the reevaluated abundance indices are appropriate given both previous and current abundance objectives if the intent is to maintain the population in the more productive range below carrying capacity but avoid historic lows, but Proposal 41 will be considered by the Board at the 2025 Central-Southwest BOG meeting in Wasilla to adjust the moose abundance objectives in Unit 13C. Proposal 41 could adjust the level at which Unit 13C moose abundance should be in order to offer antlerless moose permits, but it is important to have the option in regulation to offer the hunts when the population is within or above objectives, whatever those objectives may be, especially given the recent high abundance in Unit 13C

Because moose abundance indices are derived from annual minimum trend counts, which can vary from year to year even when a population is stable, the 3-year average moose abundance index is typically used to determine subunit status in relation to the midpoint of the population objectives (Figure 44.1). If the 3-year average is above the midpoint of the objective a conservative approach is taken to determine the number of antlerless permits to be issued,. This is based off the most

recent one-year moose abundance index (if the most recent index is lower than the 3-year average the number of permits issued reflects the lower number). In the past antlerless hunts in Unit 13 have been managed to achieve up to 1% of the estimated cow population of the subunit, based on Board of Game guidance, but in years of high productivity when wolf densities are low then additional cow harvest may be necessary to effectively stabilize the moose population within the abundance objectives.

The antlerless hunt in Unit 13C is necessary to maintain the moose population within the intensive management objectives, where the population can maintain high productivity. The additional harvest provided through this hunt also assists in achieving the harvest objectives for the population, providing more moose in Alaskan freezers. Conservative cow moose harvest should be implemented when a population is above the midpoint of the abundance objective, or within objectives and showing a growing trajectory, with the goal of stabilizing the population at a highly productive level before a population reaches or exceeds the higher objective. Cow moose harvest also allows for an increase in bull moose harvest in the same area to maintain bull-to-cow ratios near the objective of 25 bulls per 100 cows.

If antlerless moose hunting opportunities are not available in Unit 13C, the intensive management program and objectives will likely need to be restructured to maintain the moose population within a population size range that does not result in nutritional limitations and habitat damage for the moose, and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to establish an antlerless hunt opportunity in regulation to provide a management tool to stabilize moose populations to within objectives while also providing additional harvest opportunity to Alaska residents when moose abundance is within intensive management objectives. Antlerless moose hunts are necessary for achieving established management objectives for abundance, sex ratios, and harvest of moose populations. Unit 13C has demonstrated high moose abundance historically and the most recent survey data suggests that abundance remains relatively high at this time. In the past this hunt has been managed to achieve up to 1% of the estimated cow population of Unit 13C, based on guidance from the board. In years of high productivity when wolf densities are low additional cow harvest may be necessary to effectively stabilize the moose population within the population objectives.

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

PROPOSAL 45 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Add five-day archery-only for moose hunting in Unit 13.

PROPOSED BY: Jon Freeman

WHAT WOULD THE PROPOSAL DO? This proposal would add 5 days of archery-only moose hunting opportunity to the general season harvest ticket moose hunt in Unit 13, making the archery-only season dates August 27–31 with the same bag limit as the existing September 1–20 general season hunt (spike or fork or antlers 50” or larger or 4 or more brow tines on at least 1 side).

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations in Unit 13 adhere to Alaska State Constitution and AS 16.05.258 and can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*. The Community Subsistence Harvest (CSH) harvest area is defined in 5 AAC 92.074(d).

The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- **CM300 - Copper Basin Community Subsistence Harvest Hunt:**
 - The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.
 - CM300 permit holders not in possession of an any-bull locking tag have a bag limit of 1 moose with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least 1 side, with the same season dates.
 - Once the 100 any-bull allocation has been met, the bag limit is changed for all CSH participants by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines.
 - 350 CSH participants receive any-bull locking tags based on Tier II scoring criteria. Each community group must have 25 qualified individuals to successfully apply for any CSH program, and Copper Basin CSH groups are locked-in for a two-year commitment upon successful application.
 - Any eligible hunter within a group may act as a designated hunter for other members of the group.
 - Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
 - Meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

- The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.
- No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.
- After the CSH hunt has ended, unsuccessful individual household members may then acquire state or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- **GM000** - Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
- **DM348** - Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
- **DM335–339** - Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.
- **FM1301** - Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In RY2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board for state hunting of moose and caribou.
- **Federal Community Hunt:** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This change would provide additional opportunity for hunters who are not participating in the CSH hunt, which opens August 20 and has no weapons restrictions. Any hunters who are not participating in the CSH hunt could choose to take advantage of the 5 days of early-season opportunity if they wish to

hunt with archery equipment only. An early archery-only season with standard general season antler restrictions in Unit 13, when bulls are not as susceptible to calls, is not likely to result in a substantial change to the overall number of antler-legal moose harvested in Unit 13. CSH hunters would still have an early opportunity to harvest spikes, forks, $\geq 50''$, or 4 brow-tine bulls (as well as other bulls with the possession of an any-bull locking tag) prior to the archery-only general season opening date of August 27.

BACKGROUND: Over the past 10 years, an average of 4 bulls were harvested using archery equipment in Unit 13 annually (range of 1 to 8), and the vast majority of those bulls are harvested by GM000 general season harvest ticket holders. Two bulls in the past 10 years have been harvested by CM300 hunters using archery equipment, and both of those were harvested in August before the general season hunt opened. Over the past 10 years, 1 bull was harvested by a nonresident draw permit holder using archery equipment. The remaining 39 bulls harvested with archery equipment over the past 10 years were harvested by GM000 permit holders. Of the 40 bulls harvested with archery equipment in September, 42% were harvested prior to September 10 and the remaining 58% were harvested on or after September 10.

With an additional 5 days of archery-only opportunity for the general season hunt in Unit 13, early-season hunters may be drawn to the area, but it is not expected that these hunters would harvest substantially more antler-legal bulls than would be harvested already in Unit 13 (Table 45-1).

As such, the early season may reallocate some bulls from resident general season hunters and nonresident drawing permit hunters to early archery-only general season hunters, but overall antler-legal harvest is not expected to change significantly. At this time the expectation is that this additional opportunity would not have a significant impact on the overall moose harvest in Unit 13.

Table 45-1. Harvest of bull moose in Unit 13 by hunt, RY2014–2023.

Regulator y Year	CM300 a	GM000 b	Nonresident Draw ^c	Resident Draw ^d	Federal Subsistence ^e	Ceremonial Harvest ^f	Total Harvest
2014	150	676	20	3	86	3	938
2015	171	771	23		85	4	1,054
2016	201	756	21	5	100	3	1,086
2017	188	690	23	5	89	2	997
2018	154	557	20	2	61	2	796
2019	159	652	18	6	71	0	906
2020	138	635	23	5	66	0	867
2021	131	598	22	2	62	2	817
2022	125	470	21	2	54	3	675
2023	108	363	13	3	37	1	525

^a CM300 season dates: August 20–September 20, bag limit: one bull with spike or fork antlers or antlers $\geq 50''$ or 4 or more brow tines on at least one side, or any bull with the possession of an any-bull locking tag (maximum of 100 any-bulls may be harvested within the CM300 hunt area).

^b GM000 season dates: September 1–September 20, bag limit: one bull with spike or fork antlers or antlers $\geq 50''$ or 4 or more brow tines on at least one side; unknown sex assumed to be male.

^c Nonresident Draw season dates: September 1–September 20, bag limit: one bull with antlers $\geq 50''$ or 4 or more brow tines on at least one side; hunt area within Unit 13 depends on permit drawn.

^d Resident Draw season dates: September 1–September 20, bag limit: one bull; hunt area within Unit 13 depends on year.

^e Federal Subsistence season dates: August 1–September 20, bag limit: one bull in federal subsistence hunting areas only; unknown sex assumed to be male.

^f Ceremonial Harvest season dates and bag limits vary; only male harvest reported in this table.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means and allocation for moose harvest. This proposal would provide additional opportunity for archery hunters. If the board chooses to create this new archery only hunt it will need to determine if the hunt should be open to residents only or to residents and nonresidents.

COST ANALYSIS: Adoption of this proposal is not expected to cause additional cost to the department.

PROPOSAL 46– 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions.

PROPOSED BY: Paxson Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove the Community Subsistence Harvest (CSH) hunt for moose (CM300) from regulation and would establish in its place a different registration hunt to allow the take of up to 100 bulls that do not meet general season antler restrictions in Unit 13 (any-bulls). This new registration hunt would provide a 12-day season (August 15–27) for hunters in Unit 13 to harvest one bull, and antler restrictions may take effect when any-bull quotas for different subunits are met, similar to the current CSH hunt administration. The hunt would not allow the use of motorized vehicles or pack animals to hunt moose or transport hunters/hunting gear/big game except along the Parks, Denali, Richardson, and Glenn Highways. Proxy hunting would be allowed for this registration hunt.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations in Unit 13 adhere to Alaska State Constitution and AS 16.05.258 and can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*. The CSH harvest area is defined in 5 AAC 92.074(d)

The Board of Game has made a positive customary and traditional use (C&T) finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose. There is a positive C&T finding for moose in Unit 11 with an ANS of 30–40 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- **CM300** - Copper Basin Community Subsistence Harvest (CSH) Hunt:
 - The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.
 - CM300 permit holders not in possession of an any-bull locking tag have a bag limit of 1 moose with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least 1 side, with the same season dates.
 - Once the 100 any-bull allocation has been met, the bag limit is changed for all CSH participants by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines.
 - 350 CSH participants receive any-bull locking tags based on Tier II scoring criteria. Each community group must have 25 qualified individuals to successfully apply for any CSH program, and Copper Basin CSH groups are locked-in for a two-year commitment upon successful application.
 - Any eligible hunter within a group may act as a designated hunter for other members of the group.
 - Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
 - Meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.
 - The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.
 - No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.
 - After the CSH hunt has ended, unsuccessful individual household members may then acquire state or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- **GM000** - Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
- **DM348** - Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.

- **DM335–339** - Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.
- **FM1301** - Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In RY2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board for state hunting of moose and caribou.
- **Federal Community Hunt:** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH hunt for moose in Unit 13 would be replaced by a 12-day any-bull registration hunt opportunity with motorized restrictions. The current season dates for the CSH hunt allow up to 32 days of any-bull harvest opportunity, but actual season dates vary by year and by area, as any-bull quotas are sometimes met before the scheduled season closure and antler restrictions are implemented in those areas by Emergency Order. In some years some subunits have had any-bull harvest opportunity as short as 5 days before any-bull quotas were met and antler restrictions were implemented, while other subunits may run the full 32 days of the season without antler restrictions in the same year. In RY2013 all any-bull harvest opportunity was converted to antler restrictions by August 16, resulting in only 7 days of any-bull harvest opportunity for the entirety of Unit 13. The proposed registration hunt would represent a decrease in potential any-bull harvest opportunity of 20 days.

Since 2016, 58% of the bulls harvested by CSH hunters that do not meet general season antler restrictions are taken within the first 12 days of the season, but the season starts 5 days later than the proposed 12-day registration hunt season dates. The average number of days hunted by successful hunters over the history of the CSH hunt is 4.2 days, regardless of the antler status of the bull harvested. It is unclear whether adoption of this proposal will affect the ultimate opportunity or chance of success for subsistence moose hunters in Unit 13, or their ability to participate in the customary and traditional use pattern described in the Board's 2006 Findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG). The designated hunter option for the CSH hunt would be replaced with the ability to proxy hunt for the any-bull registration permit but it is unclear if proxy regulations would provide adequate opportunity for the communal pattern of use identified for moose in Unit 13.

The additional CSH salvage requirements and the requirement to hunt moose only in Unit 13 would be removed, which would make the any-bull registration permit a very popular hunt even with early season dates and motorized restrictions. The 24-hour reporting requirement would remain the same as the current CSH reporting requirement. With motorized access limited to major highways the any-bull harvest is not expected to be achieved very rapidly, and subunits may remain open through the scheduled 12-day season if any-bull quotas for entire subunits are not met. The BOG should determine if the communal pattern of use identified in Unit 13 is still being provided for if this proposal is adopted. The Unit 13 ANS for moose would likely still be achieved in most years, as it is generally achieved now with general season harvest and federal subsistence harvest combined. The BOG should also determine if the CSH hunt would remain in place for Units 11 and 12, and how this proposal might impact those units, specifically if an any-bull opportunity would be offered in Unit 11. Unit 12 is not on the call for the Central Southwest Region Board of Game meeting.

BACKGROUND: Since its inception in RY2009 the Copper Basin Community Subsistence Harvest (CSH) hunt has had a long and contentious history including litigation in 2010 and proposals submitted in every Board of Game cycle since then to eliminate hunt or modify the hunt structure. As such, the hunt has undergone continuous evolution with each Board cycle with changes over the years including season dates, salvage requirements, group eligibility requirements, reporting requirements, two-year commitments, etc. The hunt remains contentious with a variety of public opinions for and against this unique hunt structure. The Copper Basin CSH hunt area includes Units 11, 13, and a portion of 12.

The CSH hunt was implemented to provide opportunity for a communal pattern of use as well as opportunity to participate in the customary and traditional use pattern described in the Board's 2006 Findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG). There are 8 criteria listed in these findings:

1. A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.
2. A pattern of taking or use recurring in specific seasons of each year.
3. A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.
4. The area in which the noncommercial long-term, and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.
5. A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.
6. A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.
7. A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trad, barter, and gift-giving.

8. A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

One popular aspect of the Copper Basin CSH hunt is the “designated hunter” option that allows any hunter within a group to harvest on another group member’s permit, thereby allowing for a communal pattern of use that has been acknowledged by the BOG. In recent years more than 30% of CSH moose were harvested by designated hunters. While proxy hunting would be an option for an any-bull registration permit in Unit 13, proxy regulations are more limiting compared to the designated hunter option, as proxy recipients must 65 years or older, legally blind, or have 70% or greater physical disability (affidavits required for the latter 2 options).

Unit 13 has a long history of any-bull harvest opportunity, which has recently brought bull-to-cow ratios down to objectives in some subunits. In RY2010 the CSH hunt was not offered due to legal litigation, but it was reinstated in 2011 with a quota of 70 any-bulls. The hunt became increasingly popular annually (Table 46-1). From RY2012 to RY2013 the number of groups participating jumped from 19 to 45, and the any-bull quota was raised to 100 in 2013, but the rapid harvest early in the season resulted in any-bull closures 4–6 days after the season opened for all subunits. A five-day reporting requirement complicated hunt administration with high levels of participation in 2013, so in RY2014 a 24-hour reporting requirement and locking tag system was implemented. One locking tag was issued for every 3 households in each group. The overall quota was lowered to 90 any-bulls in RY2014, and returned to 100 in RY2015, which has been the overall quota since. Effective in RY2016, the CSH moose season start date in Unit 13 was moved from August 10 to August 20 but harvest remained high.

Table 46-1. Copper Basin CSH Hunt participation and harvest, RY2009–2023.

Regulatory Year	Number of Groups	Number of Permits	Hunters Reported Hunting	Number of Locking Tags	Total CSH Moose Harvest	CSH Any-Bull Harvest ¹
2009	1	378	293	-	100	70
2010 ²	-	-	-	-	-	-
2011	9	753	312	-	86	64
2012	19	961	358	-	98	76
2013	45	2,066	842	-	156	85
2014	43	1,771	607	281	150	76
2015	43	1,984	621	344	171	92
2016	73	3,023	941	485	201	114
2017	83	3,136	879	521	188	102
2018	57	2,331	664	354	154	92
2019	61	2,143	590	350	159	94
2020	49	1,703	657	352	138	80
2021	54	1,841	605	350	131	85

2022	47	1,703	609	350	125	65
2023	52	1,757	575	350	108	65

¹ Federally qualified subsistence users and DM324 permitholders harvest additional “any-bulls” in Unit 13.

² The CSH hunt was not offered in 2010 due to litigation.

The locking tag system slowed harvest and allowed for a manageable hunt. In RY2014–2017 there were Unit 13 subunits each year that did not reach quotas and Unit 11 did not reach its quota (Tables 46-2 through 46-7). Unit 13 subunits that did reach quotas did so far later in the season. Participation, however, continued to increase. To limit the number of locking tags issued for the 100 any-bulls, the BOG determined that, starting in RY2018, 350 locking tags would be issued to CSH participants based on pre-established scoring criteria. Also beginning in RY2018, groups that successfully applied to participate in the CSH hunt were locked-in for a two-year commitment.

Following these changes, 13B was the only subunit in RY2018 that closed to any-bull harvest prior to the end of the regular season and in RY2019, 13A-East and 13E were the only subunits to close to any-bull harvest prior to the end of the regular season. In RY2020, 13A-East closed just prior to the end of the regular season, and 13E closed at the end of August. In RY2021 13E was the only subunit to close prior to the end of the season, closing on September 8. In RY2022 13E closed at the end of August, 13A-East closed on September 10, and 13C closed on September 15. In RY2023 no subunits closed prior to the regularly scheduled season end dates.

Table 46-2. CSH any-bull harvest and bull-to-cow ratios in Unit 13A, RY2009–2023.

Regulatory Year	Quota ¹	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	20	15	September 17	28
2010 ²	--	-	-	-
2011	10	10	August 17	26
2012	12	15	August 15	26
2013	16	42	August 14	21
2014	6	8	August 14	28
2015	10	9	No early closure	25
2016	10	9	No early closure	19
2017	10	12	September 15	27
2018	10	10	No early closure	24
2019	5	8	August 26	-
2020	5	6	September 17	25
2021	5	6	No early closure	28
2022	5	5	September 10	26
2023	5	2	No early closure	26

¹ Starting in 2014, Unit 13A any-bull harvests have not been allowed in that portion of 13A west of Lake Louise Road, Lake Louise, Lake Susitna, Lake Tyone, and the Tyone River.

² The CSH hunt was not offered in 2010 due to litigation.

Table 46-3. CSH any-bull harvest and bull-to-cow ratios in Unit 13B, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	25	23	No early closure	36
2010 ¹	-	-	-	-
2011	20	13	August 12 ²	35
2012	17	23	September 3	33
2013	26	23	August 16	38
2014	26	25	August 26	38
2015	30	35	September 14	37
2016	30	31	September 2	34
2017	30	34	September 8	33
2018	30	33	September 18	34
2019	34	34	No early closure	29
2020	34	24	No early closure	28
2021	30	27	No early closure	30
2022	30	20	No early closure	32
2023	30	21	No early closure	31

¹ The CSH hunt was not offered in 2010 due to litigation.

² In 2011 there was a 5-mile corridor on either side of the Denali Highway in 13B with a quota of 6 “any-bulls” that closed on August 12, but the remainder of the unit remained open through September 20.

Table 46-4. CSH any-bull harvest and bull-to-cow ratios in Unit 13C, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	15	11	No early closure	42
2010 ¹	-	-	-	-
2011	10	13	No early closure	30
2012	10	14	September 17	30
2013	16	1	August 16	44
2014	16	9	No early closure	37
2015	18	8	No early closure	30
2016	18	20	No early closure	34
2017	18	11	No early closure	16
2018	18	7	No early closure	21
2019	18	12	No early closure	26
2020	18	6	No early closure	24
2021	10	9	No early closure	20
2022	7	6	September 15	23
2023	7	7	No early closure	24

¹ The CSH hunt was not offered in 2010 due to litigation.

Table 46-5. CSH any-bull harvest and bull-to-cow ratios in Unit 13D, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio CA15 ²	Post-hunt Bull:Cow Ratio CA15&25 ³
2009	10	7	No early closure	-	-
2010 ¹	-	-	-	-	-
2011	5	7	August 17	62	-
2012	8	8	August 28	67	-
2013	11	7	August 16	89	-
2014	11	13	August 31	69	-
2015	14	14	September 9	58	-
2016	14	15	September 2	89	-
2017	14	16	September 12	-	-
2018	14	17	No early closure	-	-
2019	16	13	No early closure	70	-
2020	16	17	No early closure	82	-
2021	28	15	No early closure	84	-
2022	33	13	No early closure	88	47
2023	32	11	No early closure	138	53

¹ The CSH hunt was not offered in 2010 due to litigation.

² As observed in the traditional count area surveyed in Unit 13D since 1965.

³ In response to increasing any-bull harvest in Unit 13D an additional count area was established in 2022 to provide additional survey coverage over a heavily hunted portion of Unit 13D; results are from both Unit 13D survey areas combined.

Table 46-6. CSH any-bull harvest and bull-to-cow ratios in Unit 13E, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	15	13	September 17	33
2010 ¹	-	-	-	-
2011	15	20	No early closure	31
2012	13	16	September 13	32
2013	21	12	August 16	34
2014	21	21	August 15	41
2015	26	26	September 9	25
2016	26	38	August 24	40
2017	26	29	August 27	23
2018	26	25	No early closure	27
2019	25	27	September 8	24
2020	25	27	August 30	26
2021	25	28	September 8	23
2022	23	21	August 30	28
2023	24	24	No early closure	26

¹ The CSH hunt was not offered in 2010 due to litigation.

Table 46-7. CSH any-bull harvest and bull-to-cow ratios in Unit 11, 2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	15	0	No early closure	-
2010 ¹	-	-	-	-
2011	10	1	No early closure	71
2012	10	0	September 17 ²	84
2013	10	0	No early closure	88
2014	10	0	No early closure	-
2015	2	0	No early closure	50
2016	2	1	No early closure	-
2017	2	0	No early closure	58
2018	2	0	No early closure	-
2019	2	0	No early closure	-
2020	2	0	No early closure	80
2021	2	0	No early closure	71
2022	2	0	No early closure	81
2023	2	0	No early closure	61

¹ The CSH hunt was not offered in 2010 due to litigation.

² All any-bull harvest opportunity was closed on September 17th as the overall any-bull quota of 70 had been met for the year in 2012.

Unit 13 has a long history of any-bull harvest opportunity, which has recently brought bull-to-cow ratios down to objectives in some subunits. Any-bull quotas would be established in the same way that they currently are, and antler restrictions would be implemented when quotas are met in respective subunits, so overall any-bull harvest would not increase with the implementation of this proposal. Bull-to-cow ratios in Units 13A, 13B, 13C, and 13E have been dropping since 2013 (Tables 46-2 through 46-7). Any-bull quotas are reevaluated annually based on bull-to-cow ratios, to prevent ratios from dropping below the objective of 25 bulls per 100 cows. Units 11 and 13D maintain high bull-to-cow ratios and additional harvest is available in these areas, but in the past 6 seasons the current harvest quotas have not been met prior to the end of the regularly scheduled season. Over the past 5 years, 59% of CSH moose harvest in Unit 13 has occurred in August and any-bulls from the CSH hunt account for an average of 10% of Unit 13 harvest annually (Table 46-8).

Table 46-8. Moose harvest in Unit 13 by hunt, RY2019–2023.

RY	CSH Harvest	Percent of CSH Harvest taken in				Federal Harvest	Total Harvest ¹	CSH Any-Bulls Percent of Total Harvest
		August	General Season Harvest	Resident Draw Harvest	Nonresident Draw Harvest			
2019	159	60%	652	6	18	71	906	10%
2020	138	63%	635	5	23	66	867	9%
2021	131	56%	598	2	22	62	817	10%

2022	125	61%	470	2	21	54	675	10%
2023	108	53%	363	3	13	37	525	12%

¹Includes ceremonial harvest reported in Unit 13.

Over the past five years, 22% of successful CSH moose hunters use highway vehicles or “other” transportation and no successful CSH hunters used pack animals; ATVs or ORVs are the most popular means of transportation for successful hunters (Table 46-9). ATVs or ORVs are also the most popular means of transportation for successful general season moose hunters in Unit 13, but highway vehicles and “other” transportation are only used by 9% to 12% of successful general season hunters annually (Table 46-10).

Table 46-9. Unit 13 CSH moose harvest by transportation method, RY2019–2023.

RY	Airplane	Horse/Dog Team	Boat	ATV or ORV	Highway Vehicle/ Other	<i>n</i>
2019	1%	0%	1%	74%	25%	159
2020	1%	0%	1%	76%	22%	138
2021	0%	0%	3%	70%	27%	131
2022	0%	0%	2%	72%	25%	124
2023	0%	0%	6%	82%	11%	108

Table 46-10. Unit 13 general season moose harvest by transportation method, RY2019–2023.

RY	Airplane	Horse/Dog Team	Boat	ATV or ORV	Highway Vehicle/ Other	<i>n</i>
2019	6%	0%	6%	77%	11%	652
2020	5%	0%	4%	78%	12%	635
2021	5%	0%	5%	80%	10%	600
2022	5%	0%	6%	77%	11%	470
2023	4%	0%	5%	80%	9%	364

The proponent states that motorized restrictions during the proposed August registration hunt, in place of the CSH hunt, “levels the field and allows locals a significant advantage in locales that they live and work around throughout the season while not restricting anyone who wishes to hunt.” Over the past 5 years local residents in Unit 13 have harvested 21% of the total CSH harvest. Of the local Unit 13 resident harvest in the CSH hunt over the past 5 years, 52% of hunters used ATVs or ORVs for transportation and 2% of hunters used airplanes or boats. The remaining 46% of local harvest was achieved with highway vehicles for transportation,

compared to only 16% of nonlocal harvest achieved with highway vehicle or otherwise nonmotorized transportation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means of this proposal and allocation for moose harvest. The Board would need to determine if the 8 criteria of the established customary and traditional use pattern in Unit 13 are provided for by the proposed registration hunt and the existing general season moose hunt in Unit 13 if the Board is to consider eliminating the CSH hunt. The Board will also have to determine if the new hunt structure and existing proxy regulations provide for the communal pattern of use that has been identified for moose in Unit 13, and whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting moose for subsistence uses. Depending on hunter effort and success with the new registration permit, overall levels of any-bull harvest in Unit 13 could decline with this new hunt structure; this hunt structure poses no conservation concerns and may alleviate the harvest pressure that has resulted in a decline in bull:cow ratios in most subunits. The Board also would have to determine if the CSH hunt would be eliminated for Unit 11, and if any changes would be necessary for the CSH hunt in Unit 12.

COST ANALYSIS: Adoption of this proposal is not expected to create additional cost to the department. The CSH hunt requires substantial administrative work compared to the proposed registration hunt.

PROPOSAL 47 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a late season, archery-only draw hunt for moose in a portion of Units 13B and 13E.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? This proposal would establish a new late season archery-only resident-only draw hunt within a 5-mile corridor on either side of the Denali Highway in Units 13B and 13E with season dates of September 25–30 and a bag limit of one bull moose.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations in Unit 13 adhere to Alaska State Constitution and AS 16.05.258 and can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*. The Community Subsistence Harvest (CSH) hunt area is defined in 5 AAC 92.074(d)

The Board of Game has made a positive customary and traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- **CM300** - Copper Basin CSH Hunt:

- The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.
 - CM300 permitholders not in possession of an any-bull locking tag have a bag limit of 1 moose with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least 1 side, with the same season dates.
 - Once the 100 any-bull allocation has been met, the bag limit is changed for all CSH participants by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines.
 - 350 CSH participants receive any-bull locking tags based on Tier II scoring criteria. Each community group must have 25 qualified individuals to successfully apply for any CSH program, and Copper Basin CSH groups are locked-in for a two-year commitment upon successful application.
 - Any eligible hunter within a group may act as a designated hunter for other members of the group.
 - Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
 - Meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.
 - The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.
 - No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.
 - After the CSH hunt has ended, unsuccessful individual household members may then acquire state, or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- **GM000** - Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
 - **DM348** - Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
 - **DM335–339** - Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from

September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.

- **FM1301** - Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In regulatory year (RY) 2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board to state hunting of moose and caribou.
- **Federal Community Hunt:** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create a hunt to provide additional any-bull opportunity for resident hunters, but the available any-bulls in the hunt area may be harvested by the CM300 hunt prior to the season dates for this archery-only draw hunt. This could result in the draw hunt closing in at least a subunit by Emergency Order before it opens. This would negatively impact resident hunters who successfully draw this permit, if permits are offered. More likely, permits would not be offered for this hunt while the CM300 hunt is active.

BACKGROUND: There is a long history of any-bull harvest opportunity in Unit 13, with opportunity most recently available for up to 100 any-bulls in the CSH hunt (CM300), additional any-bull opportunity by very limited draw permit for residents in Unit 13D, and unlimited federal subsistence any-bull opportunity on federal subsistence hunting lands throughout Unit 13.

Since the implementation of the CSH hunt, any-bull quotas have been established annually for each subunit based on the bull-to-cow ratio observed in moose composition and minimum count surveys post-hunt. The objective for each subunit is to maintain a bull-to-cow ratio of 25 bulls per 100 cows post-hunt. Over time, bull-to-cow ratios in the most heavily hunted Unit 13 subunits have declined toward that objective, and as the post-hunt ratios approach that objective then the any-bull quota for that subunit is decreased for the following CM300 hunting season. In this way, the bull-to-cow ratios have generally stabilized around the objective in the most heavily hunted subunits; the any-bull quotas have also stabilized in these subunits over time.

Specific to Units 13B and 13E, there is a history of any-bull harvest opportunity being met by the CM300 hunt in these subunits. In recent years in Unit 13B, the any-bull quota has not been met by the CM300 hunt and bull-to-cow ratios post-hunt suggest that a small amount of any-bull opportunity could be offered for the proposed late-season any-bull draw hunt (Table 47-1). However, for Unit 13E the any-bull quota is generally met, and post-hunt surveys suggest that

there is no additional any-bull harvest available for the proposed late-season archery-only any-bull draw hunt (Table 47-2).

Table 47-1. CSH any-bull harvest, federal bull harvest, and bull-to-cow ratios in Unit 13B, RY2009–2024.

Regulatory Year	CSH Any-bull Quota	CSH Any-bull Harvested	Any-Bull Early Closure Date	Federal Bulls Harvested	Post-hunt Bull:Cow Ratio
2009	25	23	No early closure	45	36
2010 ¹	-	-	-	62	-
2011	20	13	August 12 ²	48	35
2012	17	23	September 3	42	33
2013	26	23	August 16	37	38
2014	26	25	August 26	59	38
2015	30	35	September 14	58	37
2016	30	31	September 2	74	34
2017	30	34	September 8	55	33
2018	30	33	September 18	40	34
2019	34	34	No early closure	29	29
2020	34	24	No early closure	28	28
2021	30	27	No early closure	24	30
2022	30	20	No early closure	23	32
2023	30	21	No early closure	17	31
2024	32	TBD	TBD	TBD	TBD

¹ The CSH hunt was not offered in 2010 due to litigation.

² In 2011 there was a 5-mile corridor on either side of the Denali Highway in 13B with a quota of 6 “any-bulls” that closed on August 12, but the remainder of the unit remained open through September 20.

Table 47-2. CSH any-bull harvest, federal bull harvest, and bull-to-cow ratios in Unit 13E, RY2009–2024.

Regulatory Year	CSH Any-bull Quota	CSH Any-bull Harvested	Any-Bull Early Closure Date	Federal Bulls Harvested	Post-hunt Bull:Cow Ratio
2009	15	13	September 17	4	33
2010 ¹	-	-	-	1	-
2011	15	20	No early closure	7	31
2012	13	16	September 13	4	32
2013	21	12	August 16	4	34
2014	21	21	August 15	4	41
2015	26	26	September 9	7	25
2016	26	38	August 24	2	40
2017	26	29	August 27	6	23
2018	26	25	No early closure	2	27
2019	25	27	September 8	1	24
2020	25	27	August 30	2	26
2021	25	28	September 8	2	23
2022	23	21	August 30	2	28
2023	24	24	No early closure	3	26
2024	24	TBD	TBD	TBD	TBD

¹ The CSH hunt was not offered in 2010 due to litigation.

Over the past decade, an average of 4 moose are harvested annually using archery equipment in Unit 13 as a whole. An average of one bull per year is harvested with archery equipment in Unit 13E and only three total bulls have been harvested with archery equipment in Unit 13B over the past 10 years. The late season dates and accessible nature of this hunt are likely to attract significant interest. Although archery moose hunting may be more difficult than moose hunting with a firearm, the proposed season dates during late September occur during the rut, when bull moose are very susceptible to calls and therefore are more vulnerable to close-range harvest. This hunt would likely increase any-bull harvest in any area where it is implemented.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means as well as the allocation of moose harvest. Since 1991, the lower end of the moose population and harvest objectives in Unit 13B have been met only 4 times — the department submitted a proposal to adjust the objectives to a more biologically appropriate level (Proposal 39). An additional department proposal seeks to reduce the moose harvest objective in Unit 13E (Proposal 42).

This proposal might provide additional opportunity if the any-bull quotas for Units 13B and/or 13E are not filled by the Copper Basin Community Subsistence Harvest Hunt (CM300) in a given year but, more likely, permits would not be offered for this draw hunt for Unit 13E in years that the CM300 hunt is offered based on limited to no harvestable surplus of any-bull moose remaining after the CM300 season has closed. Permits could be made available for Unit 13B based on the history of any-bull harvest opportunity remaining after the existing August/September hunting seasons. If CM300 hunt administration remains unchanged then late-season draw permits may need to be closed by emergency order in years when CM300 any-bull quotas are met for a given subunit. If late-season draw permits result in a decline in 13B bull-to-cow ratios in future years, this could result in decreased any-bull quotas for the CM300 hunt. Adoption of this proposal will add complexity to the allocation and implementation of the hunt structure in these subunits, and the board will need to create findings to ensure the department is able to implement the complex allocation as desired by the board. As part of this, the board may wish to consider whether adding this additional non-subsistence opportunity would reduce the opportunity provided for subsistence, and if so, whether reasonable opportunity for subsistence would still be provided.

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

PROPOSAL 48 - 5 AAC 92.121. Intensive Management Plan V. Modify the intensive management plan in Unit 13 to include caribou.

PROPOSED BY: Copper Basin Advisory Committee

WHAT WOULD THE PROPOSAL DO? If adopted, the existing Intensive Management Plan for Unit 13 would be modified, or a new Intensive Management Plan for Unit 13 would be developed to include Nelchina caribou.

WHAT ARE THE CURRENT REGULATIONS? Under 92.108, the Board of Game has identified the Nelchina Caribou Herd (NCH) as important for providing high levels of harvest for human consumptive use and established an intensive management (IM) population objective of 35,000–40,000 caribou with a harvest objective of 3,000–6,000 caribou. There is also a positive customary and traditional use (C&T) finding for caribou in Units 12 and 13 with an amount reasonably necessary for subsistence (ANS) of 600–1,000 caribou.

5 AAC 92.121. Intensive Management Plan V:

(a) Plan established. The intensive management plan for the Unit 13 Wolf Predation Control Area is established in this section. (b) Unit 13 Wolf Predation Control Area: the Unit 13 Predation Control Area is established and consists of all lands within Units 13(A), 13(B), 13(C), 13(D), and that portion of Unit 13(E) east of the Alaska Railroad, except National Park Service and other federal lands where same-day-airborne take of wildlife is not allowed, encompassing approximately 21,066 square miles. The control program for this area is as follows: (1) this is a continuing control program that was first authorized by the board in 2000 for wolf control; it is currently designed to increase moose numbers and harvest by reducing predation on moose by wolves, thereby improving recruitment rates, and is expected to make a contribution to achieving the intensive management (IM) objectives in Unit 13; (2) moose and wolf objectives are as follows: (A) moose IM objectives for Units 13(A), 13(B), 13(C), 13(D), and 13(E) as established in 5 AAC 92.108 are 3,500 - 4,200, 5,300 - 6,300, 2,000 - 3,000, 1,200 - 1,900, and 5,000 - 6,000 moose respectively; (B) the moose harvest objectives for Units 13(A), 13(B), 13(C), 13(D), and 13(E) as established in 5 AAC 92.108 are 210 - 420, 310 - 620, 155 - 350, 75 - 190, and 300 - 600 moose respectively; (C) the department adopted 135 - 165 wolves as the late winter minimum abundance for Unit 13; maintaining this minimum population size will allow for sustained yield of wolves and will ensure that wolves persist in the control area; (3) board findings concerning populations and human use are as follows: (A) moose harvest has been consistently below IM objectives in Units 13(B), 13(C), and 13(E); (B) predation by wolves is an important cause of the failure to achieve population and harvest objectives; (C) a reduction in wolf predation in Unit 13 can reasonably be expected to make progress toward achieving the Unit 13(A), 13(B), 13(C), 13(D), and 13(E) IM objectives for moose; (D) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information; (E) reducing predation is likely to be effective given land ownership patterns, and (F) reducing predation is in the best interest of subsistence users; Unit 13 has long been an important hunting area for subsistence by local area residents and much of the state's population in Anchorage, the Matanuska-Susitna Valley, as well as Fairbanks and other communities around the state; it is recognized under the state's intensive management law as an area where moose are to be managed for high levels of human consumptive use; (4) authorized methods and means are as follows: (A)

hunting and trapping of wolves by the public in the Unit 13 Wolf Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles; (B) notwithstanding any other provisions in this title, the commissioner may issue public aerial permits or public land-and-shoot permits as a method for wolf removal under AS 16.05.783; (5) time frame is as follows: (A) through July 1, 2031, the commissioner may authorize the removal of wolves in the Unit 13 Wolf Predation Control Area; (B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan; (6) the commissioner will review, modify or suspend program activities as follows: (A) when the mid-point of the IM population and harvest objectives for the moose population is achieved; (B) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers below the management objective of 135 wolves specified in this subsection; (C) if after three years, the harvest of wolves is not sufficient to make progress towards the intensive management population objectives for wolves; (D) predation control activities may be suspended (i) if after three years, there is no detectable increase in the total number of moose in the control area; (ii) if after three years, any measure such as estimates of rump fat, short-yearling mass, and twinning rates, consistent with significant levels of nutritional stress in the moose population are identified; (iii) when the moose population and harvest objectives within Unit 13 predation control area have been met.

(c) Habitat Enhancement. The department may plan and execute habitat enhancement projects in areas identified for improvement based on evidence at the landscape or population level through prescribed burns, wildfire, or mechanical means to increase the potential carrying capacity across the range in Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Incorporating Thresholds to activate predator control in Unit 13 based on Nelchina caribou population status would enable the department to activate wolf control in a subunit if the caribou population is low, even if the moose population in that subunit is above the midpoint of the abundance objective. This would necessitate that cow moose hunts be in place to take advantage of extra moose that may occur on the landscape and prevent overabundance of moose if predator numbers are reduced to aid Nelchina caribou. Cow moose hunts are not currently available in Unit 13, as the necessary Advisory Committees failed to reauthorize them in 2023 for RY2024. As such, this proposal has the potential to negatively impact local moose populations where abundance is high. When moose populations are below the midpoint of the abundance objectives then this proposal would have no effect, as wolf control would already be active under the existing IM plan.

BACKGROUND: The Intensive Management plan that establishes the Unit 13 Wolf Predation Control Area has been in place since RY2001, although Unit 13C was not added until RY2005 and Unit 13D was not added until RY2022. In 2016 the board adopted a proposal to renew the

Unit 13 IM plan which included a new format that conforms to the department's protocol for IM regulations. One of the changes included removing all references to caribou which keeps the IM plans species specific which follows guidance from statutes and regulations. Statute and regulation instructs IM findings and objectives to be made at the population level, not geographic location, and be species specific. Wolf control occurs in the winter, when snow conditions allow for effective tracking and removal of wolves. Wolf control is not activated in a subunit until moose composition and minimum count surveys are completed and moose population status is assessed in November, for a wolf control start date of January 1. Wolf control in Unit 13 is currently activated or suspended on a subunit level based on moose population status for each subunit (the board will also deliberate Proposals 39, 40, and 41 to adjust population and harvest objectives for moose in Unit 13, and Proposal 58 to adjust the wolf population objective in Unit 13). Wolf control would be most beneficial for Nelchina caribou in Units 13A, 13E, and 13B, as the Nelchina herd typically spends minimal time in Units 13C and 13D, although a portion of Unit 13C does include a regular migratory corridor for the herd.

With the recent decline of the Nelchina caribou herd, the department developed a feasibility assessment for intensive management of Nelchina caribou and submitted that assessment to the Board of Game at the March 2023 meeting in Soldotna as RC026. If adopted, the department will revisit the feasibility assessment and report to the board at a later date.

In many years, such as the winter of 2023/24, the Nelchina herd winters on federal lands and developing Nelchina thresholds for other areas outside of Unit 13 would not be relevant for years such as this past winter. Furthermore, developing additional thresholds for Nelchina caribou across other portions of the range without the ability to take advantage of extra animals in those areas (such as cow moose hunts) could cause detrimental results for moose and other caribou populations if a decrease in predators results in ungulate overabundance, specifically moose. Cow moose hunts were available in Unit 13A from RY2012 to RY2023 and in Units 13C and 13E in RY2023, which made it more reasonable to activate wolf control even if moose abundance was relatively high.

Bear control is not incorporated in the current Unit 13 Intensive Management plan for moose. However, a baseline population study was conducted in 1998 that determined a brown bear density estimate of 21.3 independent bears per 1,000 km² (95% CI=18.3–25.9). Based on an aerial capture-mark-resight density survey done on bears that were collared from 2006 to 2011 in Unit 13A, there was a 25–40% reduction in brown bear densities compared to the baseline study, with 13.0 independent bears per 1,000 km² estimated in 2011. Brown bear population density in the Unit 13A study area declined by 4% annually for independent bears and 2% annually for total number of bears (dependent cubs included) and harvest rates were estimated to be greater than 8% annually. This study was repeated from 2019 to 2022 although there was slight modification to the study area to improve future sampling. With an overlap of 1,752 km² between the two project areas, comparability remains difficult but preliminary analyses suggest that the brown bear population in the Unit 13A study area has stabilized at a level lower than 1998 and shows some increase in the total number of bears since 2011. The density of independent bears (which are

subjected to hunting) have generally remained the same (2011:13/1,000 km² vs 2022: 14.8/1,000 km²) with average annual harvests prior to, and after 2011, of 140 and 138 respectively. While the density estimate for the Unit 13A study area may not be applicable to all other parts of Unit 13, these estimates serve as an index for the brown bear population over time. The generally lower population density for brown bears compared to the 1998 baseline is believed to be applicable to the Unit 13 population as a whole and the population is no longer in decline. An additional genetic mark-recapture study designed to provide additional insight and validation on the 2011/2022 capture-mark-resight population work is expected to be finalized soon.

The department is investigating cause-specific mortality of neonate caribou for the Nelchina herd, which began with a pilot effort in the spring of 2024. The pilot effort included deploying 32 neonate collars to gather calf weights comparable to the previous two seasons and identify causes of neonate mortality (calves are considered neonates within the first 15 days of life). The timing of collar deployment may have captured a slightly lower mortality rate compared to the entire 2024 cohort of calves born, but this effort included the collection of data on the temporal distribution of Nelchina caribou calving to inform future investigative efforts. Out of 32 calves, 6 died within the first 15 days of life (19%). All 6 mortalities were a result of predations and evidence strongly suggests that 4 of those deaths were caused by eagles while the other 2 deaths were caused by toothed predators such as brown bears, wolves, or wolverines. By late June a total of 12 of the 32 calves had died (38%), with initial evidence suggesting that all deaths were caused by predation; 6 most likely by eagles and 6 most likely by toothed predators such as bears, wolves, or wolverine. No evidence was identified to suggest that these calves were predisposed to predation risk due to other factors. The late June 2024 calf-to-cow ratio for the Nelchina herd was 46 calves per 100 cows, which supports the preliminary results suggesting that the Nelchina herd may have started with less than 85 calves per 100 cows and the timing of neonate collar deployment was likely to result in slightly lower mortality rates for the sampled calves compared to the overall calf cohort for 2024.

DEPARTMENT COMMENTS: The department **SUPPORTS** development of a caribou specific IM plan for the NCH to include public removal of wolves and department staff removal of wolves and bears. As noted above, the department develops species and population specific plans. The department does not support modifying the existing moose IM plan for Unit 13 to include caribou. Based on the direction of the board the department will develop a feasibility assessment for NCH IM and present this information to the board at a future meeting.

COST ANALYSIS: Adoption of this proposal would increase costs associated with Intensive Management administration.

PROPOSAL 49 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Eliminate the harvest of Nelchina Caribou.

PROPOSED BY: Ahtna Intertribal Resource Commission (AITRC)

WHAT WOULD THE PROPOSAL DO? The proposal includes Units 11, 12, 13, 14B, and 20E, but only Units 11, 13, and 14B are applicable for this Board of Game (BOG) cycle. This proposal would close all caribou hunting seasons in Units 11, 13, and 14B for the next 6 years or until the Nelchina caribou herd reaches 37,500 animals.

WHAT ARE THE CURRENT REGULATIONS? Under 92.108, the Board of Game has identified the Nelchina Caribou Herd (NCH) as important for providing high levels of harvest for human consumptive use and established an intensive management (IM) population objective of 35,000–40,000 caribou with a harvest objective of 3,000–6,000 caribou. There is also a positive customary and traditional use (C&T) finding for caribou in Units 12 and 13 with an amount reasonably necessary for subsistence (ANS) of 600–1,000 caribou.

Unit 11 currently has no open season for caribou under state or federal regulations. There is a positive C&T finding specifically for the Mentasta caribou herd, but the board has not established an ANS. Under federal subsistence hunting regulations, a hunt may be announced with a bag limit of 1 bull by federal registration permit (FC1108) for federally qualified subsistence users. This hunt intends to target Nelchina caribou but occurs in the core range for the Mentasta caribou herd. Unit 13 has no caribou hunting opportunity offered at this time, as the Nelchina caribou herd currently has no harvestable surplus. When the herd develops sufficient harvestable surplus to provide hunting opportunity, the below state regulations may apply following BOG guidance based on the amount of harvestable surplus available and the status of caribou abundance following Findings 2019–223-BOG.

Harvest opportunity under federal subsistence hunting regulations in Unit 13 has also been closed for regulatory year (RY) 2024, but the current harvest opportunities listed under federal subsistence hunting regulations for Unit 13 include:

- In Units 13A and 13B - 2 caribou by federal registration permit (FC1302) with season dates of August 1–September 30 and October 21–March 31.
- In Unit 13 remainder - 2 bulls by federal registration permit (FC1302) with season dates of August 1–September 30 and October 21–March 31.

State regulations include harvest opportunity of 1 caribou by drawing permit only for the Western Talkeetna caribou herd in Units 14A and 14B, available to residents and nonresidents with season dates of August 20–September 20 (general hunt only), and winter seasons to be announced. The number of permits issued has fluctuated between 50 and 200 over the last five years. Unit 14 is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

Bag Limits

Resident Open Season

Nonresident Open Season

1 caribou by Tier II permit only; up to 1,000 permits may be issued; or	August 10–September 20 (subsistence hunt only)	No open season
	October 21–March 31 (subsistence hunt only)	
Up to 2 caribou per harvest report per regulatory year by community harvest permit only; up to 400 caribou may be taken; or	August 10–September 20 (subsistence hunt only)	No open season
	October 21–March 31 (subsistence hunt only)	
Up to 2 caribou every regulatory year by Tier I subsistence permit only; or	August 10–August 31 (subsistence hunt only)	No open season
	October 21–March 31 (subsistence hunt only)	
Up to 2 caribou every regulatory year by Tier I subsistence permit only; or	September 1–September 20 (subsistence hunt only)	No open season
	October 21–March 31 (subsistence hunt only)	
1 caribou every regulatory year by youth hunt drawing permit; up to 200 permits may be issued; or	August 1–August 5	No open season
1 caribou every regulatory year by drawing permit; up to 5,000 permits may be issued; or	August 20–September 20	No open season
	October 21–March 31	
1 bull every regulatory year by drawing permit; up to 200 permits may be issued when the herd is at or above population objectives		August 20–September 20

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted, no state harvest opportunity would be available for Nelchina caribou in Unit 13 or for Western Talkeetna caribou in Unit 14A or 14B for 6 years or until the Nelchina herd abundance is estimated at 37,500. This would result in a loss of hunting opportunity even when a harvestable surplus is available. This is contrary to the sustained yield principle outlined in Article

8 of the Alaska Constitution and would violate AS 16.05.020 which states that the function of the department is to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and the general well-being of the state. Allowing the Nelchina caribou herd to grow to 37,500 animals before allowing any harvest under state regulations would deprive Alaska residents of the opportunity to fulfill subsistence needs and continue customary and traditional uses by utilizing any harvestable surplus that may develop before abundance of the herd reaches 37,500 (the midpoint of the current objectives).

BACKGROUND: Migratory caribou herds often experience “boom and bust” cycles. The Nelchina caribou herd is no exception, although the management strategy since the 1990s has attempted to prolong the time that the herd is at a moderate and sustainable abundance in an attempt to avoid dramatic swings in abundance typically seen in other migratory herds. Over the past two decades, management of the Nelchina herd has evolved through many iterations as the Board recognized that adaptive management strategies allow for flexibility to adapt to unforeseen situations, and thus over time provided the department with a variety of tools to achieve harvest as the herd grew.

After an extended period of overabundance, the herd experienced a dramatic decline as two severe winters in a row, coinciding with two winters of long-distance migration for the herd, impacted the adult survival and calf recruitment rates of the herd. The Nelchina caribou herd may begin to recover in coming years if there are milder winters and less difficult migrations. As with any adaptive management strategy, the herd will be assessed annually, and no state harvest opportunity will be offered if there is not sufficient harvestable surplus to allow for harvest. It is conceivable that limited bull harvest can be provided under a Tier II hunt structure followed by an any-caribou bag limit when appropriate well in advance of the herd growing to 37,500 animals. A moratorium is not necessary to ensure that happens.

A moratorium on state hunting until the herd reaches an abundance of 37,500 animals would be detrimental for the trajectory of the herd. At most, federally qualified subsistence hunters may harvest ~400–500 Nelchina caribou annually once sufficient harvestable surplus becomes available to allow that level of harvest, and in many years federal harvest would not reach this level. The long-term average of federal caribou harvest in Unit 13 is 360 animals annually. With ~400 caribou or less harvested annually, once the herd grows to 37,500 animals it would likely be growing exponentially, and it would be difficult to then implement enough state harvest to keep the herd within objectives. When state hunters were expecting significant hunting opportunity for Nelchina caribou in Unit 13 it was still difficult to achieve a total harvest of 4,000 or more animals annually to positively control herd growth. If the board were to adopt this proposal, the herd would

likely continue to grow and exceed the carrying capacity of the range, resulting in another precipitous decline after the herd recovered to and then exceeded management objectives.

If the Nelchina caribou hunting opportunity in Unit 13 remains managed based on harvestable surplus for a composition-ratio strategy rather than an abundance strategy, then Alaska residents will have the opportunity to hunt Nelchina caribou sooner and continue customary and traditional practices more consistently. Overall, more harvest will be provided. Figures 49-1 and 49-2 are based on a model that is for illustrative purposes only, to demonstrate the difference in opportunity and overall harvest available if a composition-ratio harvestable surplus strategy is utilized, compared to an abundance harvestable surplus strategy as outlined by this proposal. In this example, the composition-ratio strategy seeks to implement limited bull-only harvest in the year following a fall bull-to-cow ratio greater than 40 bulls per 100 cows, whereas the abundance strategy does not implement harvest until the abundance of the herd reaches 37,500 animals, at which point both bull and cow harvest are implemented at the same time. Both models seek to maintain the population at the lower objective of 35,000 animals with a bull-to-cow ratio above 40 bulls per 100 cows by harvesting both bull and cow caribou once the population has reached the abundance objectives.

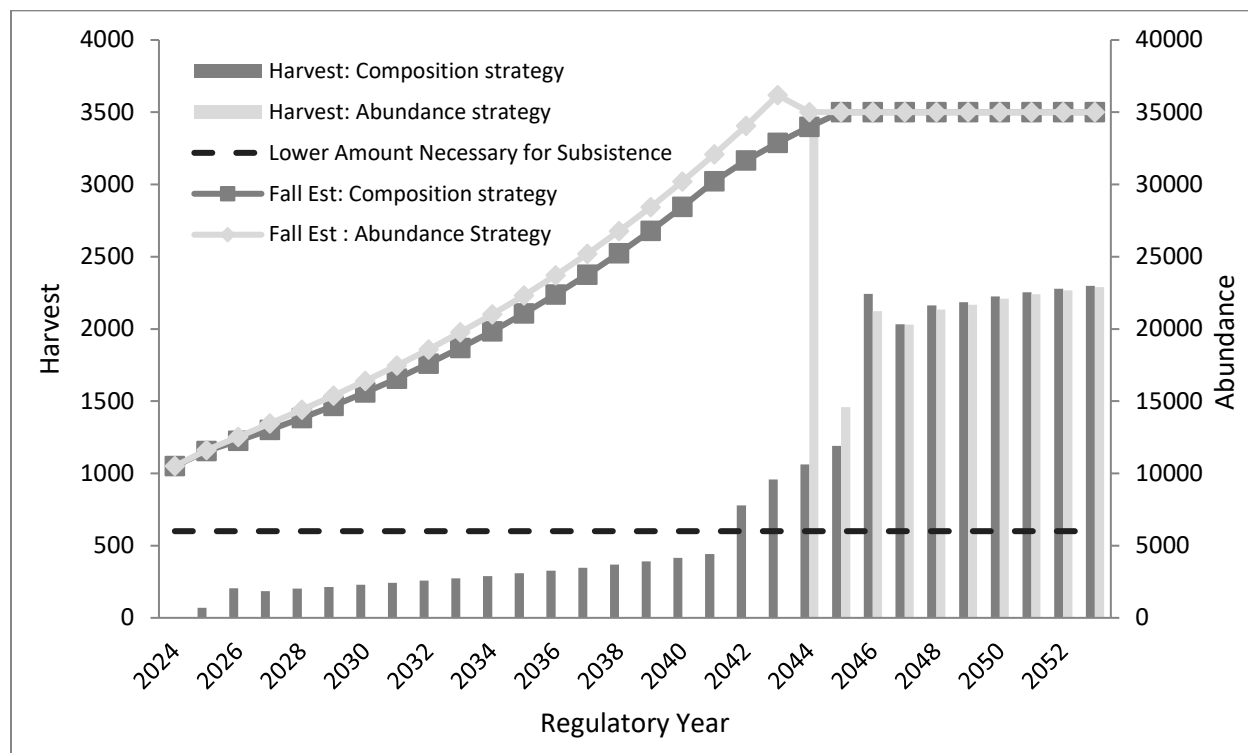


Figure 49-1. Illustrative model to compare composition strategy vs. abundance strategy for annual harvest of Nelchina caribou in Unit 13 and resulting estimated fall abundance, RY2024–2053

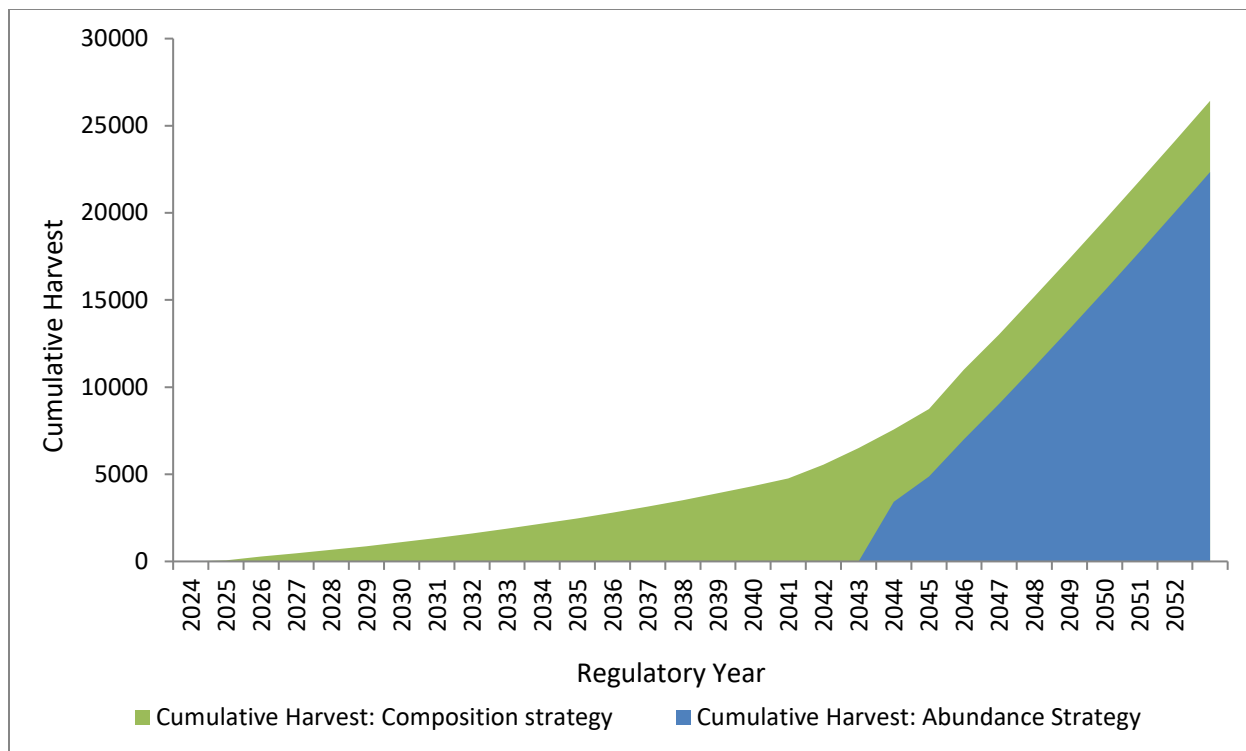


Figure 49-2. Cumulative harvest of Nelchina caribou in Unit 13 for a composition-based harvest strategy vs. an abundance-based harvest strategy, based on illustrative model, RY2024–2053.

Unit 11 has no state caribou hunting opportunity, and this proposal will therefore have no effect on Unit 11 caribou hunting.

The drawing permit hunt in Units 14A and 14B targets Western Talkeetna caribou and will not significantly impact the recovery of the Nelchina caribou herd. Of 16 GPS collars deployed in the past year in Units 14A and 14B, two animals joined Nelchina caribou in the spring/summer, and returned to Unit 14B by late August. Two other collars strayed just outside of the Unit 14 boundaries into Unit 13 in early September and are expected to return to Unit 14 in the winter. GPS collars deployed on caribou in Unit 14B sometimes stray into Unit 13, just as GPS collars deployed on Mentasta caribou in Unit 11 sometimes stray into Unit 13 and join Nelchina caribou, or collars deployed on Nelchina caribou in Unit 13 sometimes stray as far as the Steese Highway. Unit 13 Nelchina caribou hunting has not been closed in the past to protect the Mentasta caribou herd, nor should Fortymile caribou hunting on the Steese highway be closed to protect Nelchina caribou, which would be the equivalent of closing Western Talkeetna harvest opportunity in Unit 14 to protect the Nelchina caribou herd. Small amounts of herd mixing, and herd switching are normal between caribou herds in close proximity to each other. The harvest currently offered in Units 14A and 14B is biologically sustainable for the caribou that are available in that area.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The department utilizes adaptive management strategies to assess the status of the Nelchina caribou herd annually and will not offer caribou hunting opportunity in Unit 13 until such time as harvestable surplus is

available to provide for sustainable opportunity. If adopted, the board should consider whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting caribou for subsistence uses.

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

PROPOSAL 50 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep and 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts. Eliminate DS165 and replace it with general season harvest ticket sheep hunting opportunity.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate a resident full-curl Dall sheep draw hunt in the eastern portion of Unit 13D (DS165) and replace it with general season, resident-only harvest opportunity.

WHAT ARE THE CURRENT REGULATIONS? There is a negative customary and traditional use (C&T) finding for Dall sheep in Unit 13D. The current sheep hunting regulations can be found in 5 AAC 85.055 and the *2024–2025 Alaska Hunting Regulations*.

Hunters who wish to hunt Dall sheep in Unit 13D east of a line along the west side of Tazlina Glacier, Tazlina Lake, and Mendeltna Creek to the Richardson Highway may do so under the following seasons and bag limits (up to 130 permits may be issued):

Resident hunters: 1 ram with full-curl horn or larger by drawing permit only, August 10–September 20 (DS165).

Nonresident hunters: 1 ram with full-curl horn or larger every 4 regulatory years by drawing permit only, August 10–September 20 (DS265). Nonresident hunters must be accompanied by a guide or relative within the second degree of kindred. A guide must have a guide use area registration on file for the applicable guide use area during the season the drawing permit is valid.

In Unit 13D the department shall issue a maximum of 20 percent of the drawing permits to nonresidents and a minimum of 80 percent of the drawing permits to residents.

Harvested rams must be sealed within 30 days of kill.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted harvest may increase, but the bag limit would remain full-curl. Younger age classes of rams that are close to full-curl are likely to receive more harvest pressure than they currently do given an increase in hunting pressure and competition; this could affect the trophy potential for the area. Adoption of the proposal would significantly increase resident hunting opportunity leading to

increased hunting pressure in the area, increased competition, and a likely decrease in hunt quality. The proposal does not speak to what would happen to the existing nonresident drawing hunt and the board will need to discuss how to amend 5 AAC 92.057 to address the existing allocation between residents and nonresidents in the drawing hunt.

BACKGROUND: The Board of Game established resident and nonresident draw hunts for sheep in 13D east of Tazlina to the Richardson Highway in 2007, effective for RY2008 (Figure 50-1).

DS165 DS265 Sheep Drawing Permit Hunt

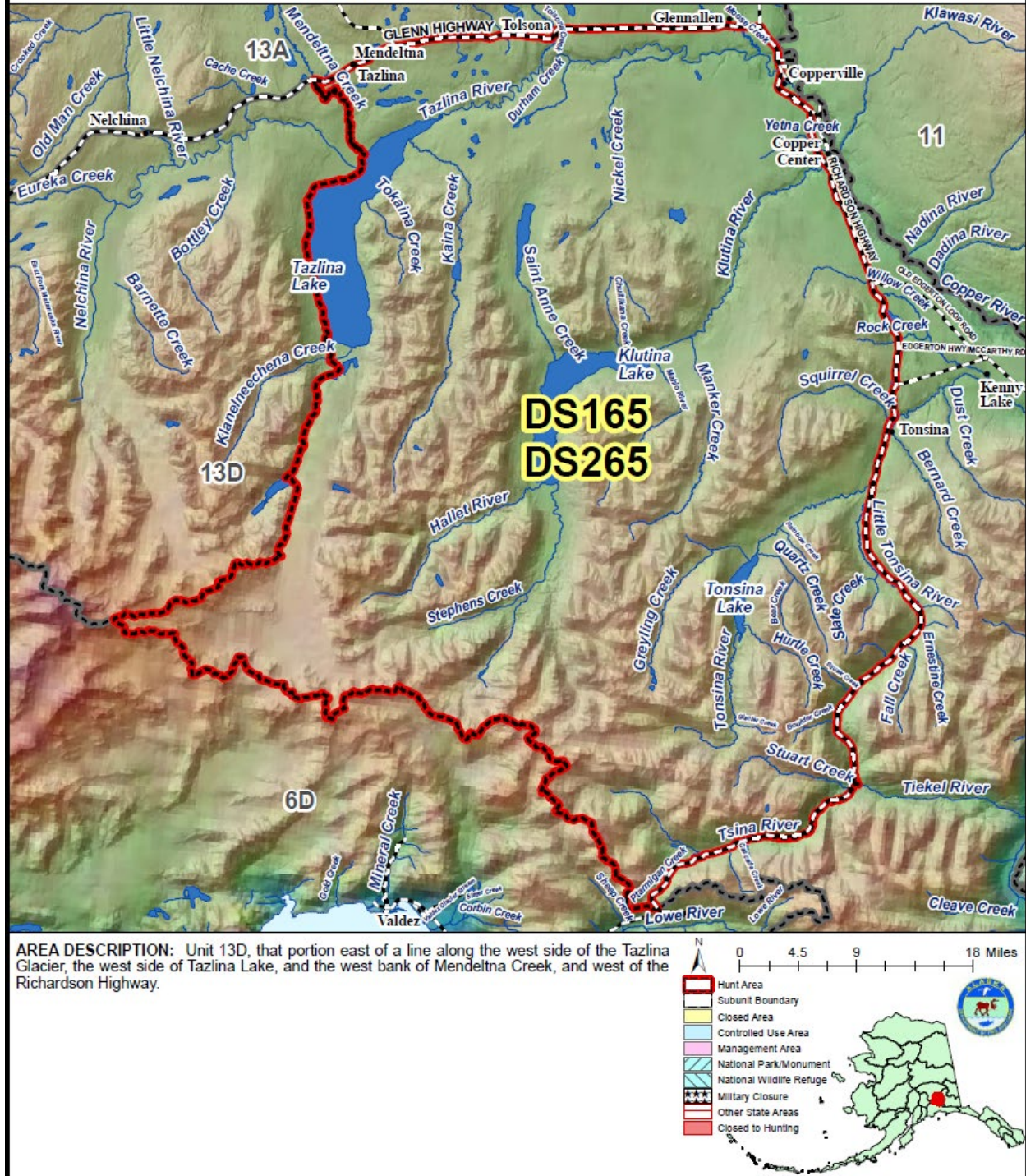


Figure 50-1. Hunt map for DS165 and DS265 in Unit 13D.

The intention of the Board in implementing these draw hunts was to improve the hunt quality and trophy potential in the area. The current management objective for the area, as written in the current *Species Management Report and Plan for Dall Sheep in Unit 13D*, is to “provide a quality hunting experience as well as the opportunity to take a trophy-class ram in the central Chugach Mountains of Unit 13D.” The DS165 and DS265 draw hunts are managed for this objective and harvest reporting suggests that this objective is being achieved. For RY2024, DS165 received 2,014 applications and DS265 received 670 applications, suggesting this is a highly sought-after hunt area.

To assess whether the DS165/265 hunt area is achieving the management objectives, it can be compared to two nearby hunt areas: the Tonsina Controlled Use Area (TCUA) in Unit 13D, and the eastern Talkeetna mountains in adjacent Unit 13A. All 3 areas are managed with full-curl harvest regulations with season dates of August 10–September 20, although the TCUA and 13A have additional youth season dates of August 1–5. DS165/265 limits hunting pressure through limited drawing permits. Draw permit numbers are based on the number of full-curl rams observed during aerial surveys every other year. The TCUA limits hunting pressure through motorized restrictions, difficult access, and rugged terrain. Prior to the implementation of DS165/265, the DS165/265 area was also managed with harvest tickets, and harvest was comparable to harvest numbers from 13A (Figure 50-2). There are no limits to hunting pressure in 13A during the open seasons; the area is open to harvest of full-curl or larger rams with a harvest ticket, has no motorized restrictions, and is a popular area with many access options.

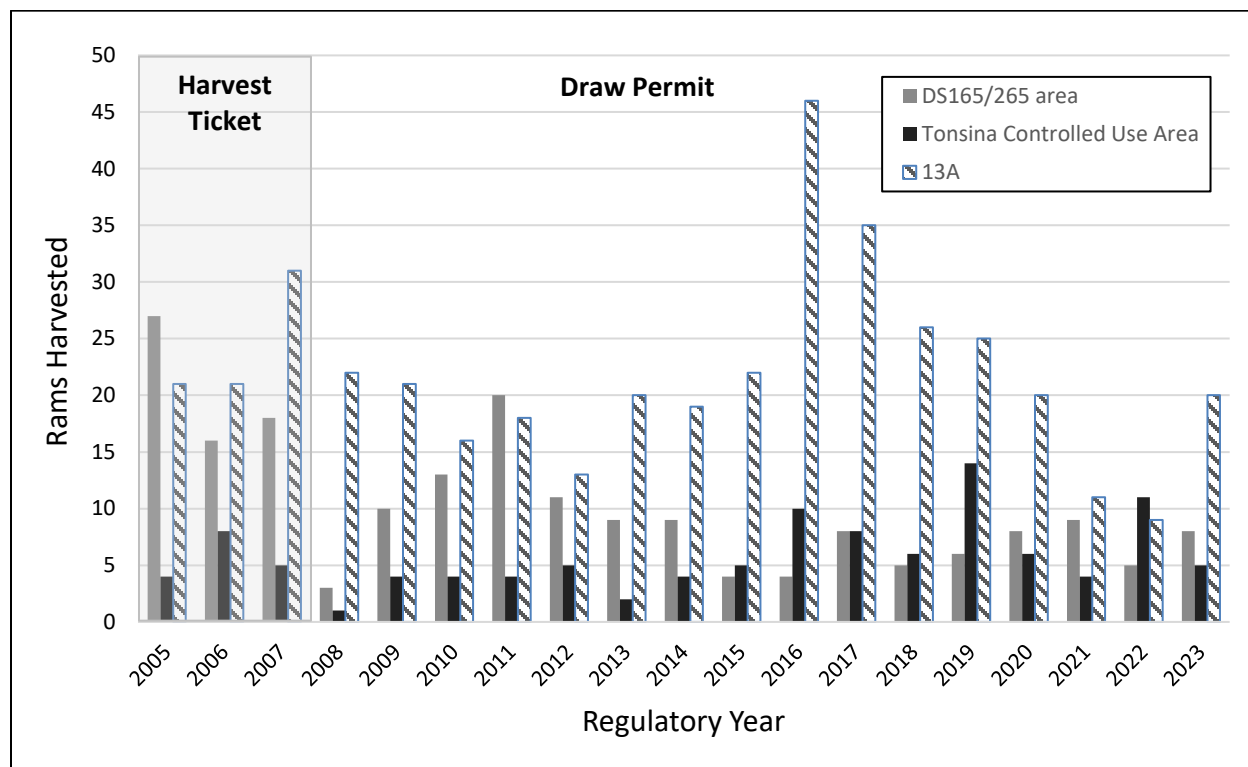


Figure 50-2. Harvest of Dall sheep rams in Unit 13A and portions of Unit 13D, RY2005–2023.

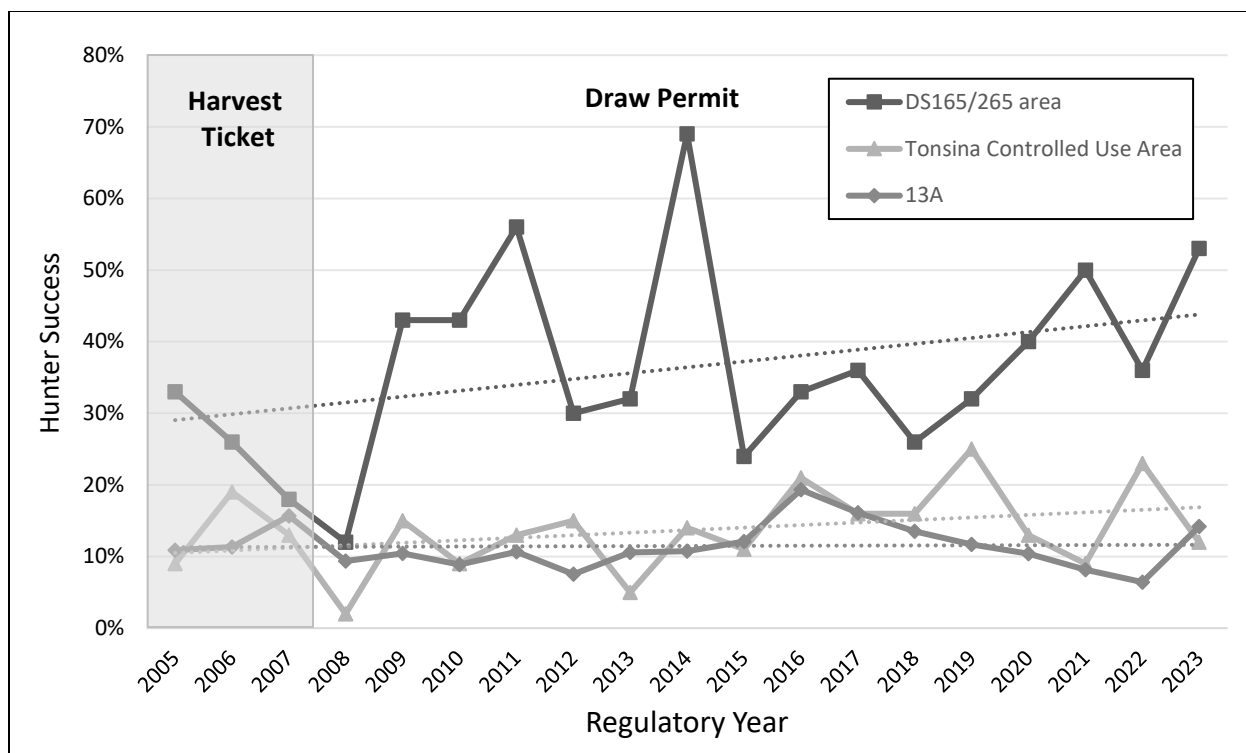


Figure 50-3. Dall sheep hunter success rates in Unit 13A and portions of Unit 13D, RY2005–2023.

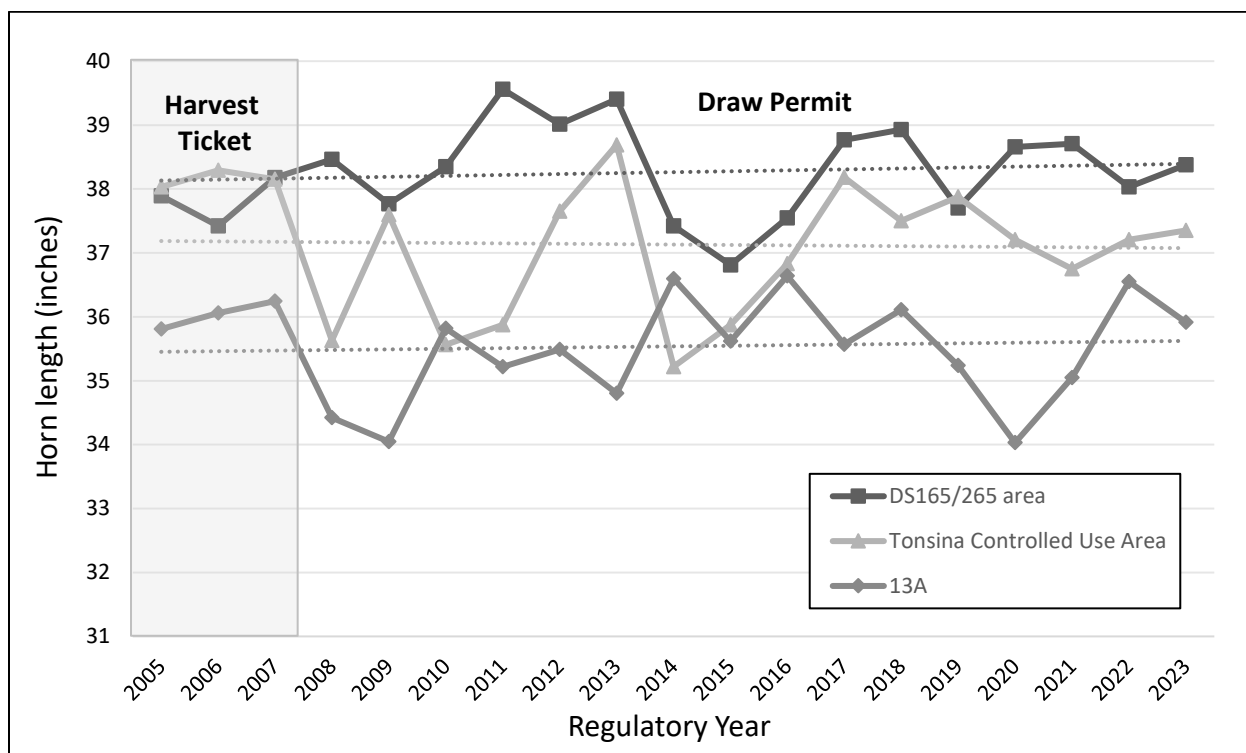


Figure 50-4. Average horn length of harvested rams in Unit 13A and portions of Unit 13D, RY2005–2023.

After 2008, harvest in the DS165/265 area has been more comparable to harvest numbers from the TCUA. However, hunt success in the DS165/265 area is much higher than either of the other two areas, and is generally higher than it was prior the implementation of the draw hunt (Figure 50-3). Rams harvested in the DS165/265 area are also consistently larger than those harvested in the other 2 areas (Figure 50-4).

Current management objectives of a high-quality hunt with good trophy ram potential are being met with the draw hunt strategy in place in the DS165/265 area. Hunter success rates are high, competition is relatively low, and trophy-class rams are consistently harvested from the draw area. Replacing the draw hunt with a harvest ticket hunt would require modification to the management objectives for the area

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative nature of this proposal. Maintaining full-curl bag limits will prevent overharvest if hunters abide by the full-curl regulations. If the board is inclined to adopt the proposal it will also need to discuss how to amend 5 AAC 92.057 which is the allocation between residents and nonresidents in the existing drawing hunt, because if adopted, this will be the first place in the state where residents hunt with a harvest ticket and nonresidents hunt with a drawing permit. The board will also need to discuss if it is appropriate to add a youth sheep hunt in this area if it changes the drawing hunt to a harvest ticket hunt. When the board created the existing youth hunts, it added the youth hunts to each area open by general season harvest ticket where there was a full-curl bag limit and season dates of August 10 – September 20.

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

PROPOSAL 51 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Close a portion of sheep hunt in the Chitina River drainage in Unit 11 to nonresidents.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would eliminate all nonresident sheep hunting opportunity in Unit 11 north of the Chitina River, west of Canyon Creek, and south of Young Creek (MacColl Ridge). The proponent does not specify whether the resident-only hunt should be a draw hunt, registration hunt, or general season hunt, nor does it specify season dates or bag limits.

WHAT ARE THE CURRENT REGULATIONS? The current Dall sheep hunting regulations can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*. The Board has a positive customary and traditional use determination for Dall sheep in Unit 11 with an amount necessary for subsistence of 60–75 sheep.

Regulations allow for the take of Dall sheep in Unit 11 with general season harvest tickets. There is a youth hunt available to residents and nonresidents with season dates of August 1–August 5, with a full-curl bag limit for resident youth and a full-curl every 4 regulatory years for nonresident youth. The general season hunt is open to all residents and nonresidents with season dates of August 10–September 20 and a bag limit of 1 full-curl or larger ram for residents and full-curl or larger ram every 4 regulatory years for nonresidents. Nonresidents must be accompanied by a registered guide or a resident relative within second-degree of kindred. Harvested rams must be sealed within 30 days of kill.

Federal subsistence hunting regulations allow for federally qualified rural residents to take any ram on National Park Service lands in Unit 11 using a state general season harvest ticket with season dates of August 10–September 20, and rams must be sealed within 30 days of kill. Federal regulations also allow for the take of any sheep on National Park Service lands in Unit 11 with a federal permit available to federally qualified rural residents 60 years of age or older, or to a minor-elder joint pair, with season dates of August 1–October 20 and no sealing requirements.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would eliminate nonresident opportunity to harvest Dall sheep on MacColl Ridge in Unit 11, but clarification is necessary to determine the type of hunt, season dates, and bag limit for the resident-only hunt that would be established. The new resident-only hunt would likely draw significant levels of interest and competition to MacColl Ridge if administered as a registration or general season hunt because of the attention it will create by being addressed separately in regulation. As a result, harvest on MacColl Ridge is likely to increase slightly and this may impact the trophy potential for that area. Additional language may be necessary to clarify the boundaries of the hunt area, as Young Creek does not flow into the Chitina River (Figure 51-1).

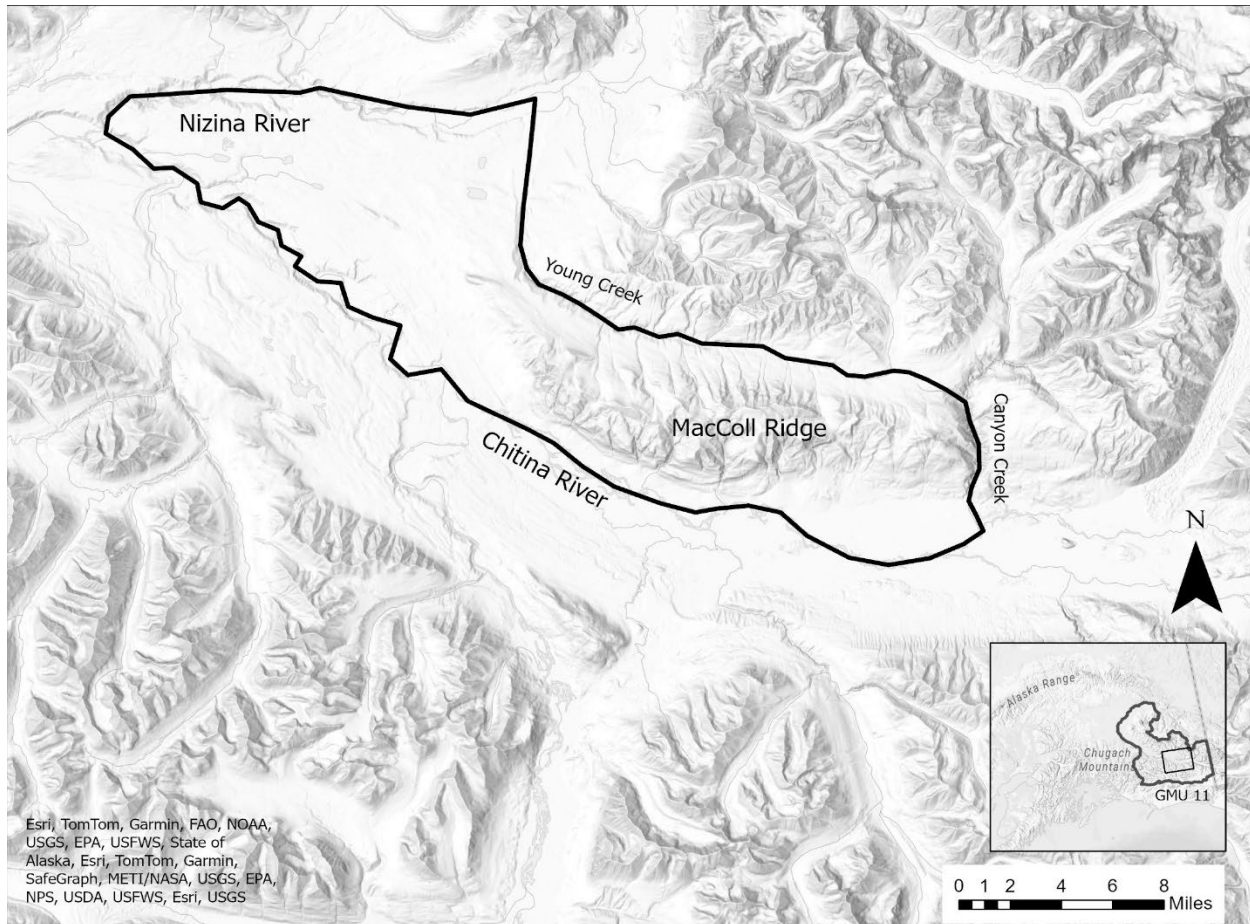


Figure 51-1. Approximation of proposed MacColl Ridge Management Area, Unit 11.

BACKGROUND: MacColl Ridge is located within Wrangell St. Elias National Preserve along the Chitina River in Unit 11 where state hunting regulations apply for residents and nonresidents, and federal subsistence hunting regulations apply for federally qualified subsistence users.

MacColl Ridge is roughly 15 miles long, although the proposed management area would be larger as the boundaries include non-sheep habitat assuming that “south of the Nizina river” is added to the description to close the northern boundary between Young Creek and the Chitina River. The majority of the area is National Park Service lands, although a backcountry lodge is situated on private lands at the base of MacColl Ridge, across from Bear Island. MacColl Ridge can only be reasonably accessed by airplane or boat.

The proponent expresses that the purpose of the new resident-only hunt would be to provide an area in which residents have the opportunity to hunt without the added competition and pressure from guided nonresidents, especially given the recent decline in sheep populations across the state.

Recent history of hunting pressure and harvest on MacColl Ridge suggests that the new resident-only hunt would reallocate harvest opportunity from nonresident guided hunters to resident hunters, and additional rams may be taken with increased hunting pressure (Table 51-1). While a

recent minimum count survey of MacColl Ridge suggests that current numbers are below historic highs, the total number of adults observed in 2023 suggests that the decline in numbers has not been as drastic on MacColl Ridge as declines observed in other parts of the state, and significant harvest opportunity is available under the full-curl harvest strategy (Table 51-1).

Table 51-1. Resident and nonresident hunters and harvest on MacColl Ridge, RY10–23.

Year	Resident Hunters	Res Success Rate	Nonresident Hunters	Nonres Success Rate	Total Harvest	% of total Harvest by Res	Full-curl rams observed during aerial surveys
2010	1	100%	5	80%	5	20%	4
2011	5	20%	6	100%	7	14%	-
2012	3	0%	1	100%	1	0%	-
2013	1	0%	3	100%	3	0%	-
2014	1	0%	3	100%	3	0%	-
2015	5	0%	2	50%	1	0%	-
2016	2	0%	2	100%	2	0%	-
2017	2	0%	4	100%	4	0%	-
2018	0	-	3	100%	3	0%	-
2019	0	-	2	100%	2	0%	-
2020	3	67%	2	50%	3	67%	-
2021	1	0%	2	100%	2	0%	-
2022	2	0%	6	67%	4	0%	-
2023	1	100%	3	100%	4	25%	8

Table 51-2. Resident and nonresident hunters and harvest in Unit 11, RY10–23

Year	Resident Hunters	Resident Success Rate	Nonresident Hunters	Nonres. Success Rate	Total Harvest	% of total Harvest by Res
2010	124	31%	19	53%	49	80%
2011	127	30%	13	77%	48	79%
2012	118	24%	13	54%	35	80%
2013	107	26%	18	94%	45	62%
2014	116	31%	19	74%	50	72%
2015	128	33%	21	38%	50	84%
2016	123	36%	12	83%	54	81%
2017	134	26%	21	81%	52	67%
2018	139	37%	20	90%	69	74%
2019	145	39%	19	84%	73	78%
2020	174	28%	19	58%	60	82%
2021	144	29%	13	77%	52	81%
2022	144	26%	22	50%	48	77%
2023	135	20%	13	54%	34	79%

Hunting pressure and harvest on MacColl Ridge is not reflective of the overall situation in Unit 11, where hunting opportunity in Wrangell St. Elias National Preserve is open to residents and nonresidents, but hunting opportunity in Wrangell St. Elias National Park is open to local federally qualified residents only. In Unit 11 as a whole, resident hunting pressure and success is higher than on MacColl Ridge (Table 51-2). The amount necessary for subsistence is generally not reached by actual harvest, but additional harvestable surplus is available annually. Significant general season opportunity is available for all Alaska residents and nonresidents is restricted to one full-curl ram every four years. Nonresident harvest in Unit 11 averages 12 rams annually (RY10–23).

DEPARTMENT COMMENTS: The Department is **NEUTRAL** on the allocation of Dall sheep opportunity and harvest. If this proposal is adopted it would require modification of the hunt area boundary description to define a complete boundary. Adoption of this proposal would also require specification of season dates, a bag limit, and hunt type for the resident-only hunt. A registration permit or general season hunt for MacColl Ridge with no nonresident hunting competition would attract significant interest and a drawing permit would be more appropriate for such a small area.

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

PROPOSAL 52 – 5 AAC 92.530. Management Areas and 85.055. Hunting seasons and bag limits for Dall sheep. Establish a management area around MacColl Ridge with a resident only registration hunt for Dall sheep.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would establish a new MacColl Ridge Management Area (the area of Unit 11 north of the Chitina River, west of Canyon Creek, and south of Young Creek). This proposal would also establish a new registration permit hunt for Dall sheep within this management area, which would be available to residents only with season dates of August 10–September 20 and full-curl bag limit.

WHAT ARE THE CURRENT REGULATIONS? The current Dall sheep hunting regulations can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*. The Board has a positive customary and traditional use determination for Dall sheep in Unit 11 with an amount necessary for subsistence of 60–75 sheep.

Regulations allow for the take of Dall sheep in Unit 11 with general season harvest tickets. There is a youth hunt available to residents and nonresidents with season dates of August 1–August 5, with a full-curl bag limit for resident youth and a full-curl every 4 regulatory years for nonresident youth. The general season hunt is open to all residents and nonresidents with season dates of August 10–September 20 and a bag limit of 1 full-curl or larger ram for residents and full-curl or

larger ram every 4 regulatory years for nonresidents. Nonresidents must be accompanied by a registered guide, or resident relative within second-degree of kindred. Harvested rams must be sealed within 30 days of kill.

Federal subsistence hunting regulations allow for federally qualified rural residents to take any ram on National Park Service lands in Unit 11 using a state general season harvest ticket with season dates of August 10–September 20, and rams must be sealed within 30 days of kill. Federal regulations also allow for the take of any sheep on National Park Service lands in Unit 11 with a federal permit available to federally qualified rural residents 60 years of age or older, or to a minor-elder joint pair, with season dates of August 1–October 20 and no sealing requirements.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would eliminate nonresident opportunity to harvest Dall sheep on MacColl Ridge in Unit 11. The new resident-only registration permit would likely draw significant levels of interest and competition to the new MacColl Ridge Management Area. As a result, harvest on MacColl Ridge is likely to increase slightly because of the attention it will create by being addressed separately in regulation and this may impact the trophy potential for that area. Additional language may be necessary to clarify the boundaries of the new Management Area, as Young Creek does not flow into the Chitina River (Figure 52-1).

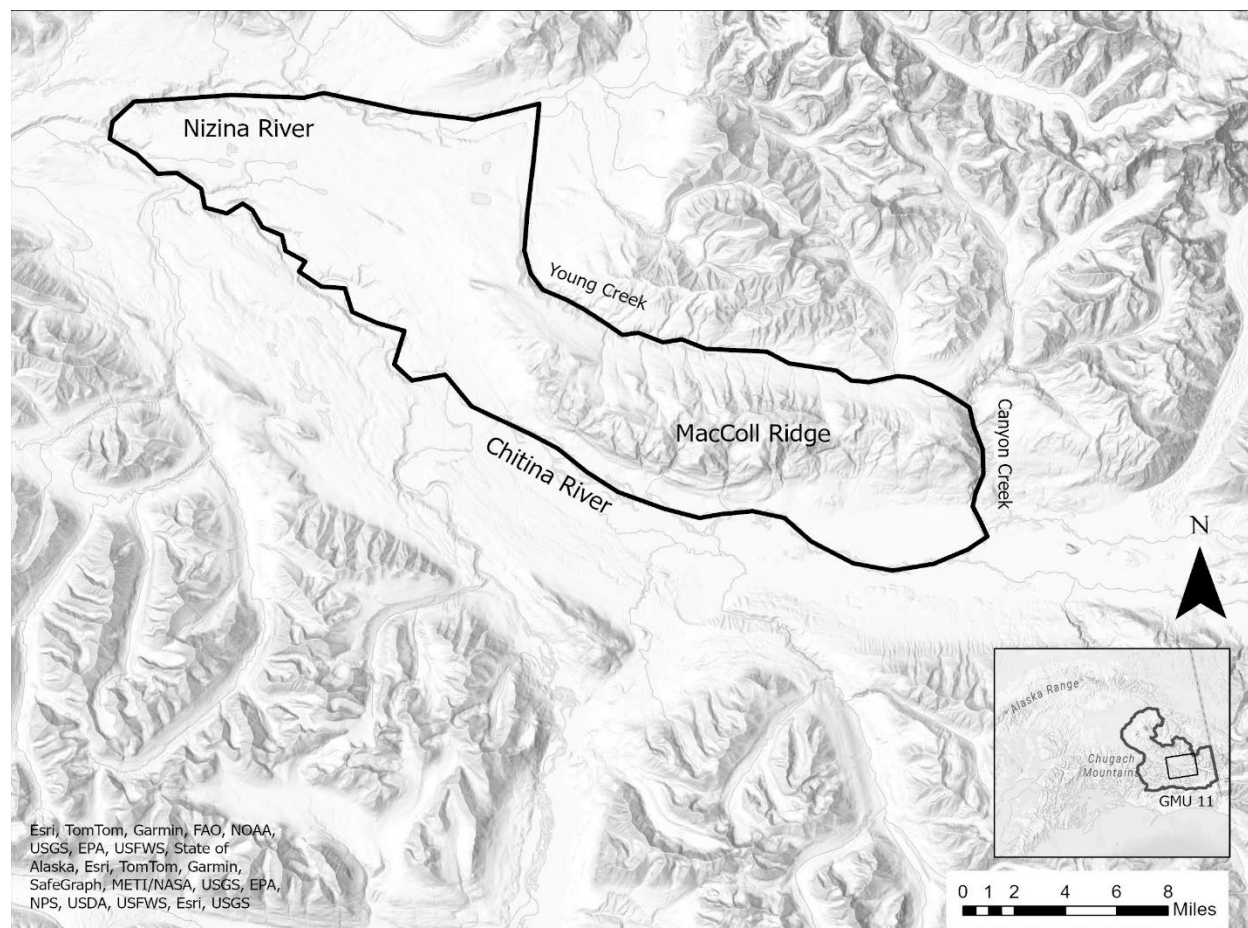


Figure 52-1. Approximation of proposed MacColl Ridge Management Area, Unit 11.

BACKGROUND: MacColl Ridge is located within Wrangell St. Elias National Preserve along the Chitina River in Unit 11 where state hunting regulations apply for residents and nonresidents, and federal subsistence hunting regulations apply for federally qualified subsistence users.

MacColl Ridge is roughly 15 miles long, although the proposed management area would be larger as the boundaries include non-sheep habitat assuming that “south of the Nizina river” is added to the description to close the northern boundary between Young Creek and the Chitina River. The majority of the area is National Park Service lands, although a backcountry lodge is situated on private lands at the base of MacColl Ridge, across from Bear Island. MacColl Ridge can only be reasonably accessed by airplane or boat.

The proponent expresses that the purpose of the new MacColl Ridge Management Area would be to designate an area to give opportunity and preference to resident sheep hunters to hunt without the added competition and pressure from guided nonresidents, especially given the recent decline in sheep populations across the state.

Recent history of hunting pressure and harvest on MacColl Ridge suggests that the new Management Area and associated registration hunt would reallocate harvest opportunity from nonresident guided hunters to resident hunters, and additional rams may be taken with increased hunting pressure (Table 52-1). While a recent minimum count survey of MacColl Ridge suggests that current numbers are below historic highs, the total number of adults observed in 2023 suggests that the decline in numbers has not been as drastic on MacColl Ridge as declines observed in other parts of the state, and significant harvest opportunity is available under the full-curl harvest strategy (Table 52-1).

Table 52-1. Resident and nonresident hunters and harvest on MacColl Ridge, RY10–23.

Year	Resident Hunters	Res Success Rate	Nonresident Hunters	Nonres Success Rate	Total Harvest	% of total Harvest by Res	Full-curl rams observed during aerial surveys
2010	1	100%	5	80%	5	20%	4
2011	5	20%	6	100%	7	14%	-
2012	3	0%	1	100%	1	0%	-
2013	1	0%	3	100%	3	0%	-
2014	1	0%	3	100%	3	0%	-
2015	5	0%	2	50%	1	0%	-
2016	2	0%	2	100%	2	0%	-
2017	2	0%	4	100%	4	0%	-
2018	0	-	3	100%	3	0%	-
2019	0	-	2	100%	2	0%	-
2020	3	67%	2	50%	3	67%	-
2021	1	0%	2	100%	2	0%	-

2022	2	0%	6	67%	4	0%	-
2023	1	100%	3	100%	4	25%	8

Table 52-2. Resident and nonresident hunters and harvest in Unit 11, RY10–23

Year	Resident Hunters	Res. Success Rate	Nonresident Hunters	Nonres. Success Rate	Total Harvest	% of total Harvest by Res
2010	124	31%	19	53%	49	80%
2011	127	30%	13	77%	48	79%
2012	118	24%	13	54%	35	80%
2013	107	26%	18	94%	45	62%
2014	116	31%	19	74%	50	72%
2015	128	33%	21	38%	50	84%
2016	123	36%	12	83%	54	81%
2017	134	26%	21	81%	52	67%
2018	139	37%	20	90%	69	74%
2019	145	39%	19	84%	73	78%
2020	174	28%	19	58%	60	82%
2021	144	29%	13	77%	52	81%
2022	144	26%	22	50%	48	77%
2023	135	20%	13	54%	34	79%

Hunting pressure and harvest on MacColl Ridge is not reflective of the overall situation in Unit 11, where hunting opportunity in Wrangell St. Elias National Preserve is open to residents and nonresidents, but hunting opportunity in Wrangell St. Elias National Park is open to local federally qualified residents only. In Unit 11 as a whole, resident hunting pressure and success is higher than on MacColl Ridge (Table 52-2). The amount necessary for subsistence is generally not reached by actual harvest, and additional harvestable surplus is available annually. Significant general season opportunity, available for all Alaska residents and nonresidents, are restricted to one full-curl ram every four years. Nonresident harvest in Unit 11 averages 12 rams annually (RY10–23).

DEPARTMENT COMMENTS: The Department is **NEUTRAL** on the allocation of Dall sheep opportunity and harvest. If this proposal is adopted it will require modification of the Management Area boundary description to define a complete boundary. This proposal maintains a full-curl harvest strategy, which prevents overharvest, but a resident-only registration permit for MacColl Ridge with no nonresident hunting competition would attract significant interest and a drawing permit would be more appropriate for such a small area.

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

PROPOSAL 53 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep Establish a late-season archery-only Dall sheep drawing hunt for residents in Unit 13D.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would establish a new 15-day, full-curl draw sheep hunt opportunity for residents in Unit 13D west of the Richardson Highway with season dates of October 1–15.

WHAT ARE THE CURRENT REGULATIONS? The current sheep hunting regulations can be found in 5 AAC 85.055 and the *2024–2025 Alaska Hunting Regulations*.

Unit 13D east of a line along the west side of Tazlina Glacier, Tazlina Lake, and Mendeltna Creek to the Richardson Highway (up to 130 permits may be issued):

Resident hunters: 1 ram with full-curl horn or larger by drawing permit only, August 10–September 20 (DS165).

Nonresident hunters: 1 ram with full-curl horn or larger every 4 regulatory years by drawing permit only, August 10–September 20 (DS265).

Unit 13D west of a line along the west side of Tazlina Glacier, the west side of Tazlina Lake, and the west bank of Mendeltna Creek (up to 50 permits may be issued):

Resident hunters: 1 ram by drawing permit only, August 10–September 20 (DS160).

Nonresident hunters: 1 ram every 4 regulatory years by drawing permit only, August 10–September 20 (DS260 or DS060).

Nonresident hunters must be accompanied by a guide or relative within the second degree of kindred.

In Unit 13D the department shall issue a maximum of 20 percent of the drawing permits to nonresidents and a minimum of 80 percent of the drawing permits to residents, and 20 percent of the nonresident permits are allocated to nonresidents hunting with resident relatives within the second degree of kindred. Harvested rams must be sealed within 30 days of kill.

There is a negative customary and traditional use (C&T) finding for Dall sheep in Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal would create an additional 15 days of hunting opportunity for residents who choose to apply for and are drawn for an archery-only draw permit with a full-curl bag limit and season dates of October 1–15, with a hunt area in Unit 13D west of the Richardson Highway. This would provide additional hunting opportunity in an area where the majority of accessible full-curl rams are likely harvested during the existing draw hunt seasons and weather in the area during the

October season dates will present difficult access and substantial sheep hunting challenges, so chances of success during this new October season would be low. This additional draw hunt opportunity is not likely to increase harvest significantly for the area. The number of resident permits issued for this late season would impact the number of nonresident permits available to be issued for the early season if the number of permits issued to residents in the early season was not reduced, because of the allocations found in 5 AAC 92.057.

BACKGROUND: The Board of Game established resident and nonresident draw hunts for sheep in Unit 13D west of the Richardson Highway in 2007, effective for RY2008, with 2 distinct hunt areas represented by DS165/265 (East) and DS160/260 (West) (Figure 53-1). Both areas have season dates of August 10–September 20.

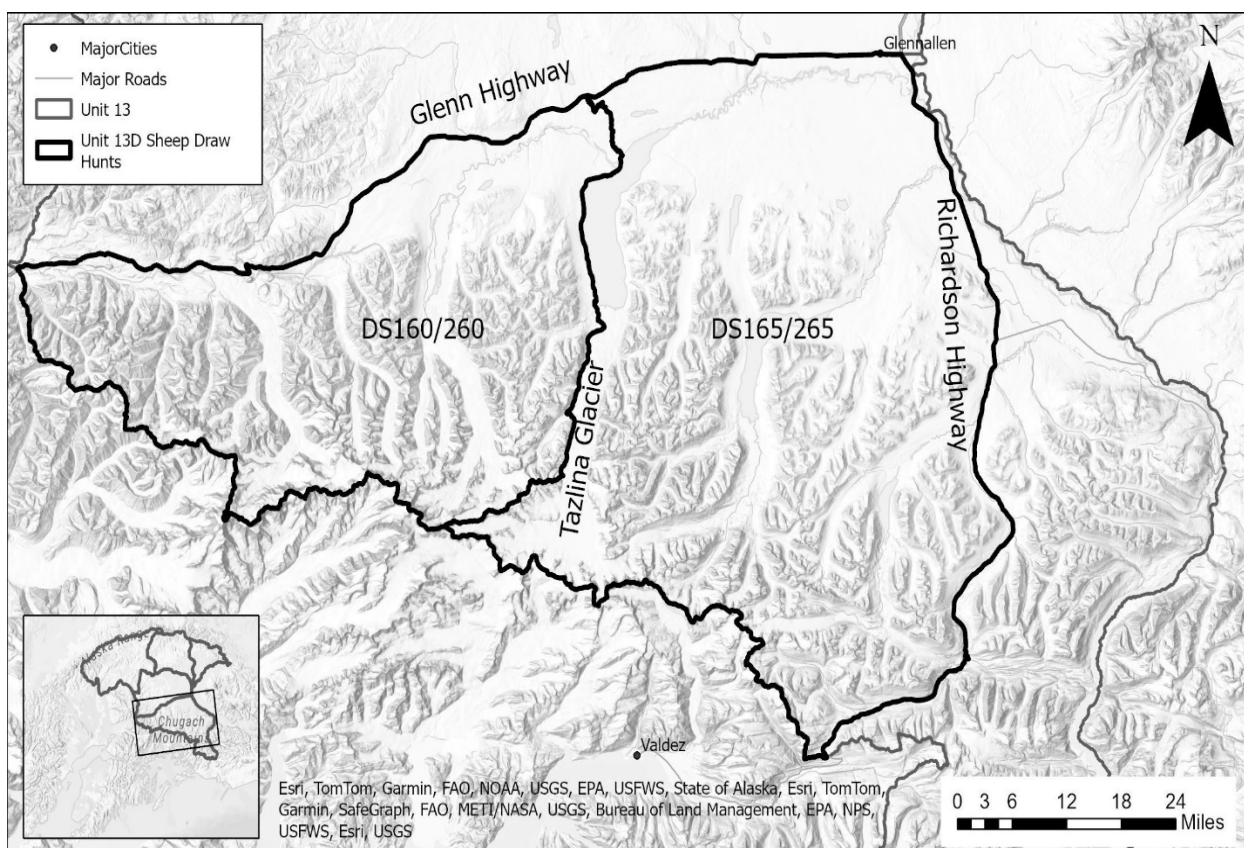


Figure 53-1. Hunt map for DS160/260 and DS165/265 in Unit 13D.

This proposal would combine the DS160/260 and DS165/265 area to create an additional late-season archery-only resident-only harvest opportunity. In the history of harvest reporting for Dall sheep in Unit 13D, only 1 ram has been reported as harvested with a bow, and that harvest occurred in 2011. The current draw hunt structure already limits competition for those hunters interested in hunting in Unit 13D, regardless of whether they choose to hunt with archery equipment or firearms.

The full-curl bag limit would prevent overharvest of sheep in Unit 13D with this additional harvest opportunity, but other factors would limit hunt success as well. Much of Unit 13D is difficult to

access, and weather conditions in early October would compound that difficulty, especially in the high country as snow accumulates. Some sheep may come down to lower elevations in early October, but finding full-curl rams after harvest has occurred in the August/September draw hunt would be difficult.

In addition, archers hunting during this period would not be subject to the same aircraft restrictions imposed on hunters during the general harvest sheep season which might improve chances for success. Under the current regulations hunters may not use aircraft to locate sheep or direct hunters to sheep during the time period of August 10 to September 20. There is a proposal to be considered at this Board of Game meeting to extend the ban on aerial spotting of sheep into October to cover this proposed additional hunting season and remove that potential advantage.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the methods and means of this proposal. Maintaining full-curl bag limits for Dall sheep will prevent overharvest if hunters abide by the full-curl regulations, and the additional opportunity presented by this proposal offers very little chance of hunter success.

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

PROPOSAL 54 - 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Change the bag limit for the Unit 13D sheep drawing hunts, DS060, DS160, and DS260

PROPOSED BY: Herb Mansavage and Dan Montgomery

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit for the Dall sheep draw hunts west of a line along the west side of the Tazlina Glacier, Tazlina Lake, and Mendeltna Creek (DS060/160/260) from 1 ram to 1 ram with a full-curl horn or larger, 8 years old, or 2 broken tips.

WHAT ARE THE CURRENT REGULATIONS? The current sheep hunting regulations can be found in 5 AAC 85.055 and the *2024–2025 Alaska Hunting Regulations*.

Unit 13D east of the Richardson Highway may do so under the following seasons and bag limits:

Resident hunters: 1 ram with full-curl horn or larger by general season harvest ticket, August 10–September 20. Youth hunters have additional season dates of August 1–5.

Nonresident hunters: 1 ram with full-curl horn or larger every 4 regulatory years by general season harvest ticket, August 10–September 20. Youth hunters have additional season dates of August 1–5.

Hunters who wish to hunt Dall sheep in Unit 13D west of a line along the west side of Tazlina Glacier, the west side of Tazlina Lake, and the west bank of Mendeltna Creek (up to 50 permits may be issued):

Resident hunters: 1 ram by drawing permit only, August 10–September 20 (DS160).

Nonresident hunters: 1 ram every 4 regulatory years by drawing permit only, August 10–September 20 (DS260 or DS060).

Nonresident hunters must be accompanied by a guide or relative within the second degree of kindred.

In Unit 13D the department shall issue a maximum of 20 percent of the drawing permits to nonresidents and a minimum of 80 percent of the drawing permits to residents, and 20 percent of the nonresident permits are allocated to nonresidents hunting with resident relatives within the second degree of kindred. Harvested rams must be sealed within 30 days of kill.

There is a negative customary and traditional use (C&T) finding for Dall sheep in Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal would align the bag limit for the DS060/160/260 hunt area with the DS165/265 hunt area. This would eliminate the any-ram harvest opportunity and replace it with the standard full-curl harvest strategy in an area where mature rams do not always grow horns that complete a full-curl. This could result in a decrease in hunting opportunity if this area remains a drawing hunt, as permit numbers would be based off of the minimum number of full-curl rams observed during surveys, rather than the ram-to-ewe ratio currently used to determine permit numbers.

BACKGROUND: The Board of Game established resident and nonresident draw hunts for sheep in 13D west of the Richardson Highway in 2007, effective beginning RY2008, with two distinct hunt areas represented by DS165/265 (East) and DS160/260 (West) (Figure 54-1). Both areas have season dates of August 10–September 20.

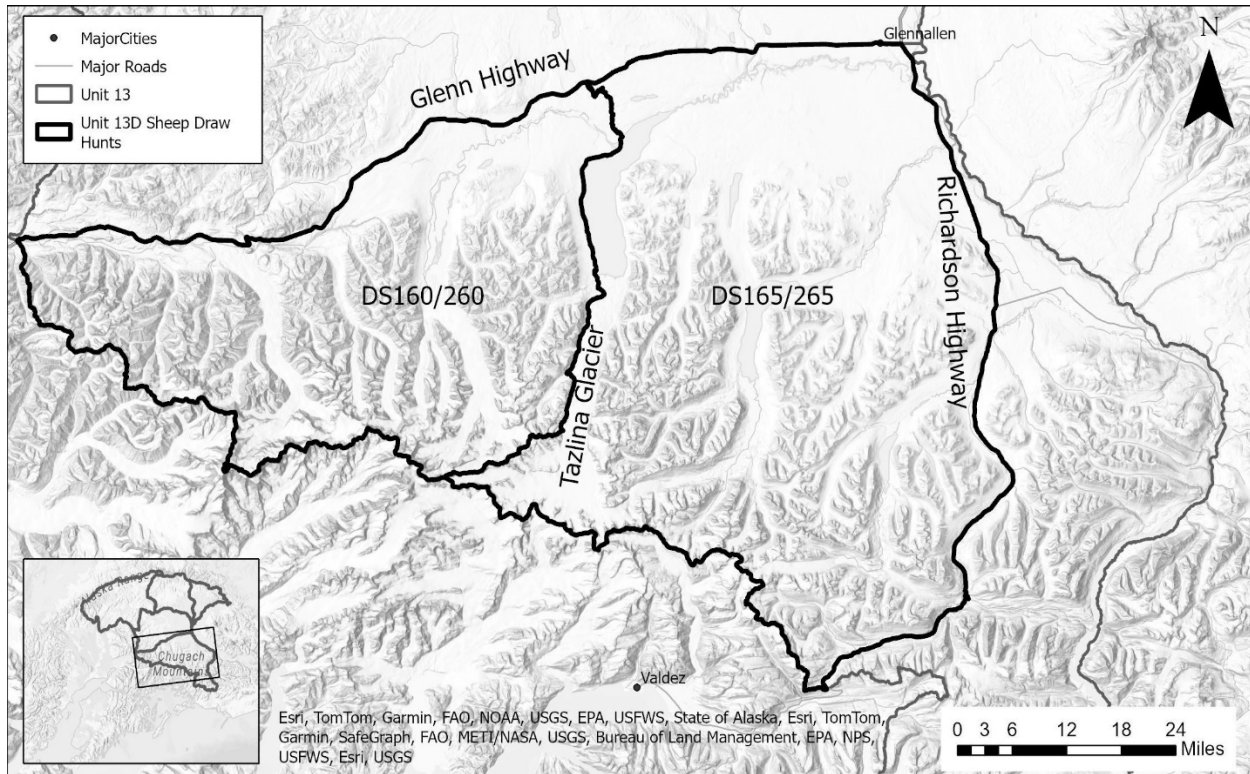


Figure 54-1. Hunt map for DS160/260 and DS165/265 in Unit 13D.

The DS160/260 hunt area was established as an any-ram hunt area to allow the take of less than full-curl rams without confirming age, as rams were understood to be growing old in this area without reaching full-curl. Hunters expressed concern about shooting rams based on age, which is a practice that is generally discouraged by the department. The DS160/260 hunt area was established as a unique hunt opportunity to allow the take of rams without the pressure of determining age or full-curl status, with the expectation that most hunters would still prefer to harvest a mature ram. As such, permit numbers for this draw hunt area are based on minimum count sheep surveys conducted every other year, with the goal of maintaining a biologically adequate ram-to-ewe ratio after the hunt, which is a conservative approach to protect the biological viability of the population. This unique any-ram harvest opportunity is the third most popular draw sheep hunt in the state. For RY2023 permits, DS160 received 3,702 applications for 15 permits, DS260 received 810 applications for 2 permits, and DS060 received 406 applications for one permit.

The current management strategy of the DS160/260 any-ram draw area can be compared with the management strategy of the neighboring DS165/265 full-curl draw area to assess the performance of the current any-ram hunt management. Overall harvest in both areas declined after the implementation of draw permits, but hunt success in the DS160/260 any-ram hunt area is comparable to or higher than that observed in the DS165/265 hunt area, with less rams harvested on average because less permits are typically issued for the DS160/260 hunt area (Figure 54-2).

The average age of rams harvested in the DS160/260 any-ram hunt area is generally comparable to the average age of rams harvested in the DS165/265 hunt area (Figure 54-3).

The proponents state that the intention of this proposal is to cease the harvest of juvenile, non-breeding rams in the DS160/260/060 hunt area. Figure 54-4 demonstrates the number of juvenile non-breeding rams harvested throughout the history of this hunt, in comparison to the minimum number of rams observed in the hunt area during summer sheep surveys.

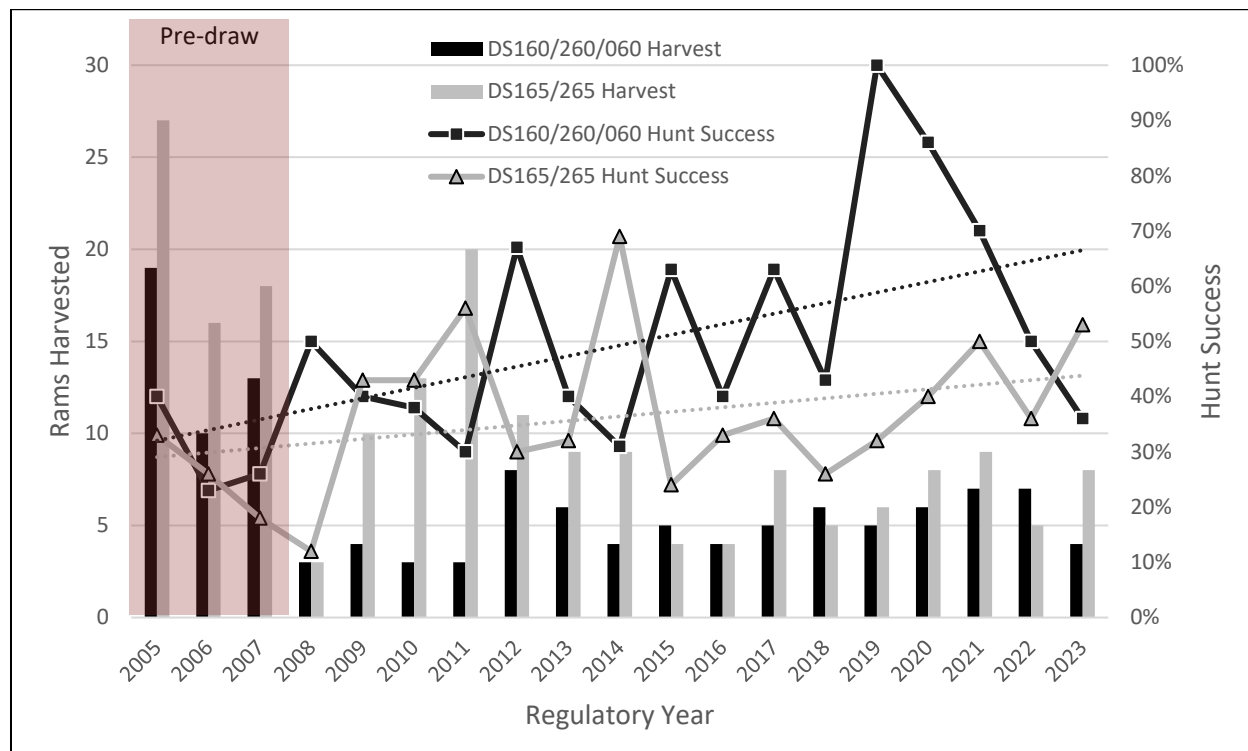


Figure 54-2. Harvest and hunter success rates in Unit 13D draw hunt areas, RY2005–2023.

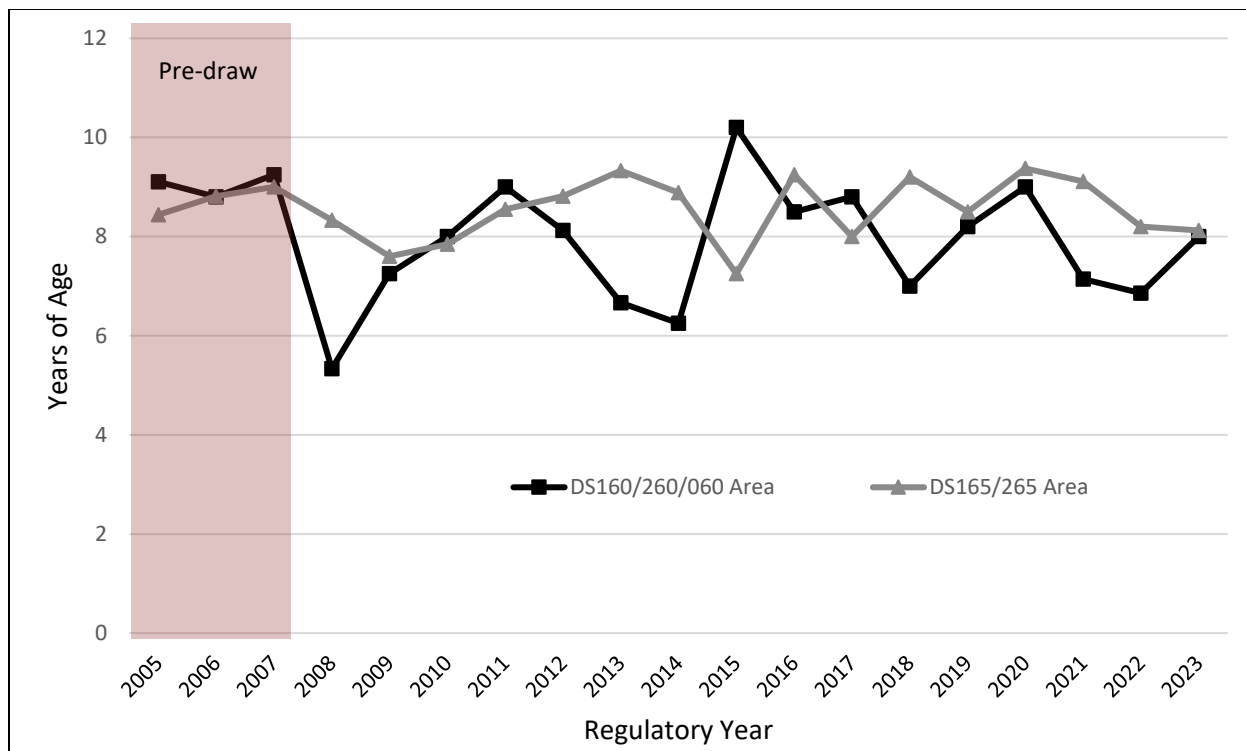


Figure 54-3. Average age of rams harvested in Unit 13D draw hunt areas, RY2005–2023.

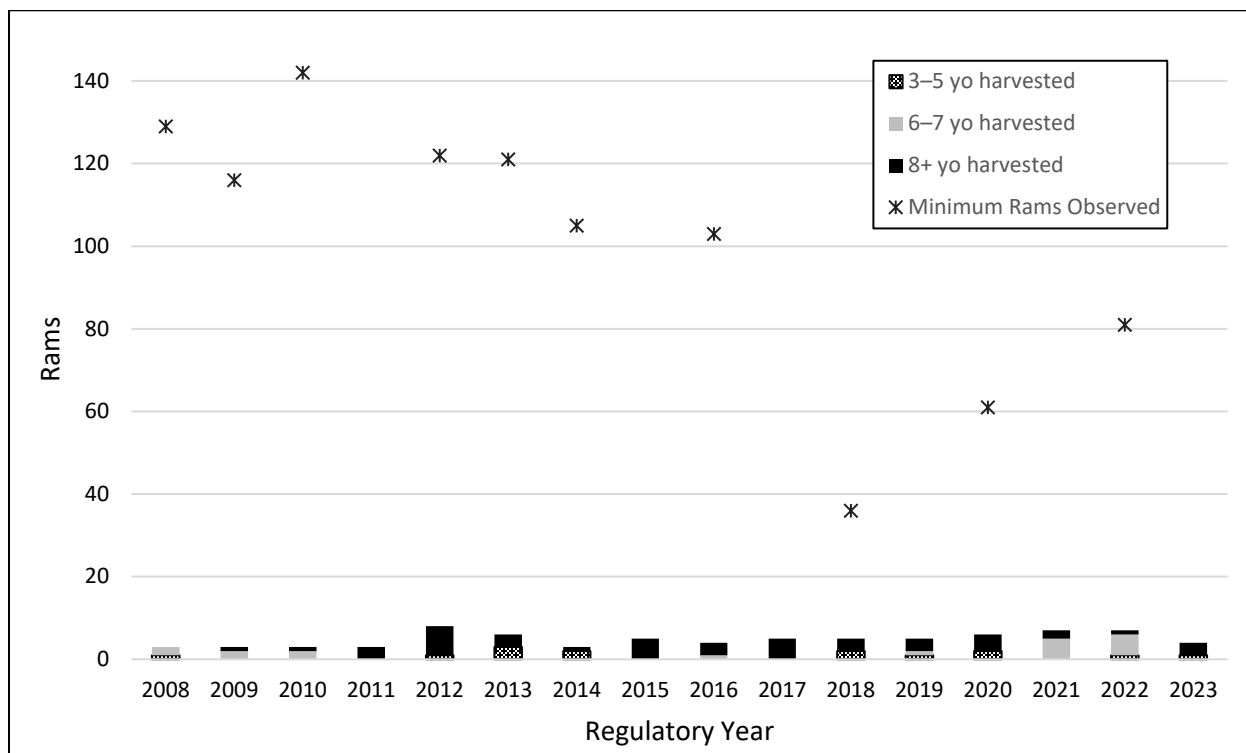


Figure 54-4. Minimum rams observed and age class of rams harvested in DS160/260/060 hunt area, RY2008–2023.

The DS160/260/060 hunt area maintains a high ram-to-ewe ratio, but the proportion of rams deemed to be full-curl in minimum count surveys is consistently lower in the DS160/260/060 area than it is in the DS165/265 area, consistent with the understanding that rams in the DS160/260/060 area do not always reach full-curl as they mature (Figures 54-5 and 54-6). Harvest data support this understanding, as some rams harvested in the area are 9 or 10 years old, but only reach 3/4–7/8 curl, and it is not uncommon for rams 8 years or older to be less than full curl, with some 8-year-olds reaching less than ¾ curl (Figure 54-7).

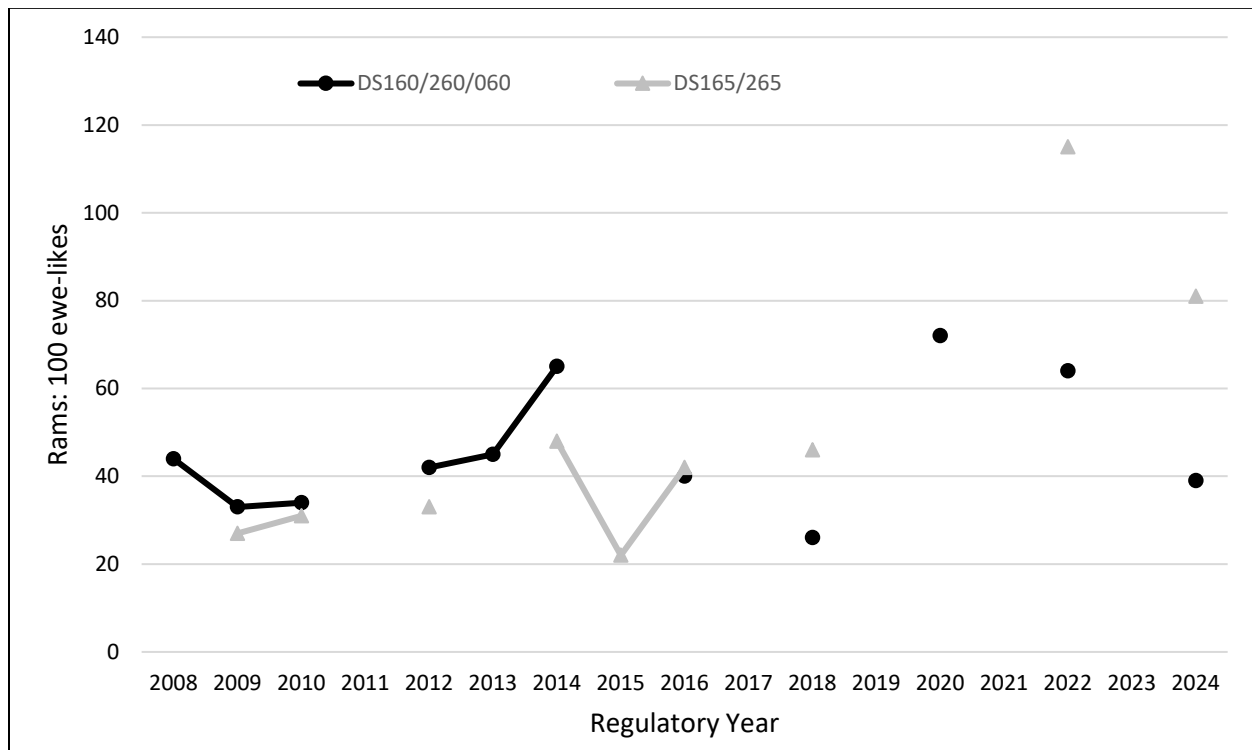


Figure 54-5. Ram-to-ewe-like ratios observed during minimum count sheep surveys in Unit 13D draw hunt areas, RY2008–2024.

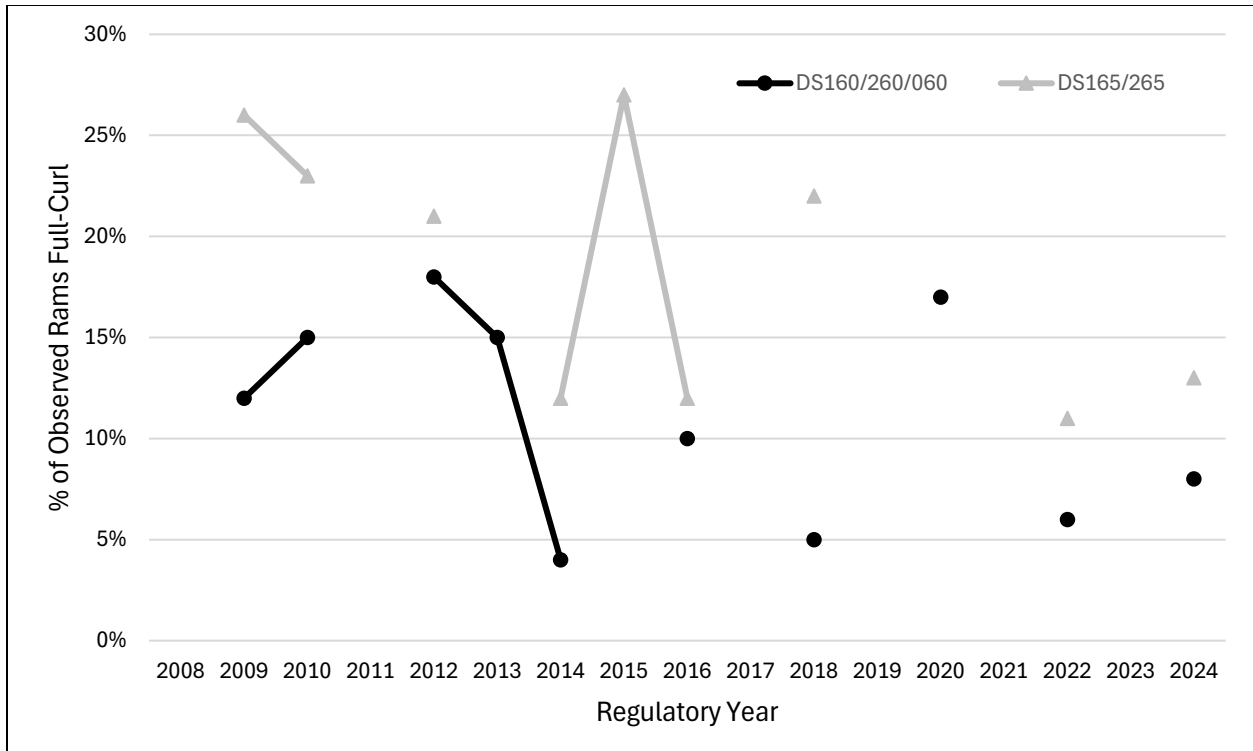


Figure 54-6. Percentage of rams observed in minimum count surveys that appear to reach full curl in Unit 13 D draw hunt areas, RY2008–2024.

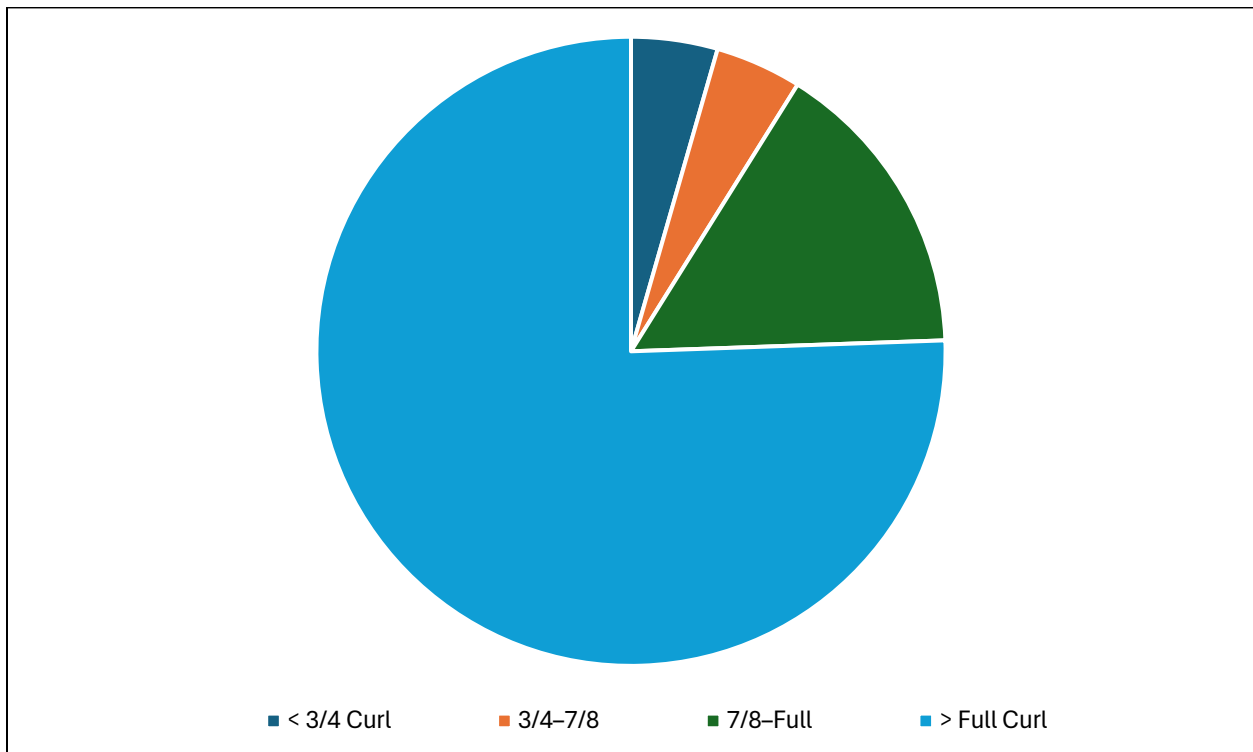


Figure 54-7. Curl class for rams harvested in DS160/260/060 that are 8 years of age or older, n=45, RY2008–2023.

If this proposal were adopted and the intention is still to provide high hunt quality with limited competition and high chance of success, then permit numbers would be based on minimum full-curl rams observed during July surveys every other year, similar to how permit numbers are currently derived for the DS165/265 hunt area, rather than the ram-to-ewe ratio that is currently used to determine permit numbers in the DS160/260 hunt area. This could result in a decrease in permit numbers if this area remains a draw permit with the current management objectives, as the DS060/160/260 hunt area has proportionally less full-curl rams typically seen in surveys.

The DS060/160/260 hunt area was established to allow the take of mature rams without the pressure of judging age in the field, as not all mature rams are reaching full-curl. Harvest data show that the intention of this hunt area is being achieved, as the majority of rams harvested are mature rams and the harvest of rams in this hunt area does not appear to be biologically detrimental when population performance is compared with nearby areas.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on management objectives for Dall sheep in the DS060/160/260 hunt area. Adoption of this proposal could result in a decrease in harvest because many rams in the area do not reach 360 degrees of curl even when 8 years old or older.

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

PROPOSAL 55 - 5 AAC 85.040. Hunting seasons and bag limits for goats. Divide the DG720 mountain goat draw hunt area into 3 separate permit hunt areas.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? If adopted the proposal would split the DG720 mountain goat draw hunt area in Unit 13D into 3 separate mountain goat draw hunt areas (Figure 55-1).

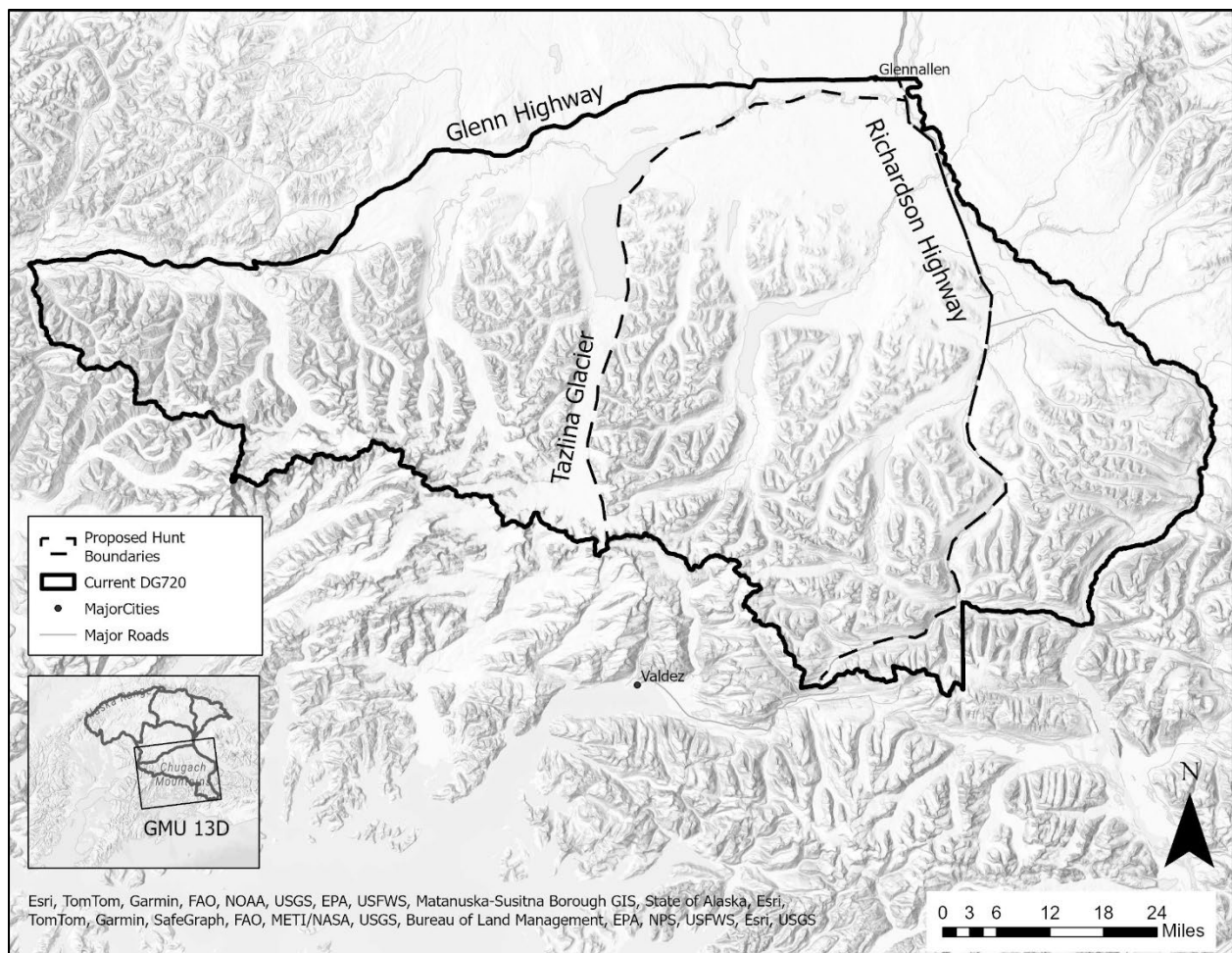


Figure 55-1. Existing DG720 mountain goat hunt boundaries and proposed boundaries for new mountain goat draw hunt areas, Unit 13D.

WHAT ARE THE CURRENT REGULATIONS? The current mountain goat hunting regulations can be found in 5 AAC 85.040 and the *2024–2025 Alaska Hunting Regulations*.

Hunters who wish to hunt mountain goats in Unit 13D, south of the Tiekkel River and east of a line beginning at the confluence of the Tiekkel and Tsina rivers, may do so under the following seasons and bag limits:

Resident and Nonresident hunters: 1 goat by registration permit (RG580), September 1–November 30.

Hunters who wish to hunt mountain goats in Unit 13D remainder may do so under the following seasons and bag limits, and up to 130 permits may be issued:

Resident and Nonresident hunters: 1 goat by drawing permit only, August 10–November 30 (DG720).

Nonresident hunters must be accompanied by a guide or resident relative within the second degree of kindred.

There is a negative customary and traditional use finding for Mountain goats in Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted then hunters would be more restricted geographically in where they can hunt mountain goats in Unit 13D based on the specific draw hunt that they apply for or draw. Additional opportunity would not be created by splitting the DG720 hunt area into smaller hunt areas. Overall hunt success may decrease with adoption of this proposal, which could result in a decrease in harvest until permit numbers can be adjusted to account for any changes in hunt success.

BACKGROUND: The DG720 hunt for Unit 13D remainder has been offered as one large hunt area since RY2011. Prior to RY2011 this hunt area was split into 3 hunt areas as this proposal describes. ADF&G has the authority to split DG720 into separate hunt areas and currently chooses not to, as goat densities are low in the DG720 hunt area and providing the option of hunting the entire area provides a greater chance of success. Permit numbers are established based on minimum goat numbers observed during sheep surveys conducted in July every other year using a very conservative approach, as population data is very limited (Table 55-1). Permit numbers were decreased for RY2024 out of an abundance of caution following severe winters, a decline in abundance observed during 2022 surveys, an increase in the most recent 5-year average of permit success rates compared to the prior 5-year average; an increase in the most recent 5-year average of percentage of female goats in harvest; ; and a survey schedule that would provide updated counts in the summer of 2024. With updated survey results permit numbers for DG720 in RY2025 will likely increase to 15 permits, depending on the results of the RY2024 hunt.

Table 55-1. DG720 permit numbers, harvest, success rates, and percentage of females in harvest, RY2011–2024.

Regulatory Year	Permits	Harvest	Permit Success	Hunter Success	% Female in Harvest
2011	35	8	23%	57%	0%
2012	35	3	9%	20%	33%

2013	50	10	20%	45%	10%
2014	35	6	17%	43%	17%
2015	50	10	20%	59%	30%
2016	35	5	14%	31%	20%
2017	35	9	26%	75%	33%
2018	35	10	29%	53%	20%
2019	35	10	29%	48%	20%
2020	35	8	23%	36%	75%
2021	35	8	23%	40%	50%
2022	35	6	17%	30%	0%
2023	18	6	33%	50%	50%
2024	8	TBD	TBD	TBD	TBD

Splitting the DG720 hunt area into 3 smaller areas would result in the same total number of permits currently available, as permit numbers would still be based off minimum goat observations every other year. If splitting the DG720 hunt area into 3 smaller areas results in a decrease in hunt success for one of those areas then additional permits may be offered in the future to accommodate for a lower success rate, but initially following such a split the same overall number of permits would be offered as if the DG720 area remained one hunt area.

To maximize opportunity, goat surveys would have to be conducted in Unit 13D annually in September, which would interfere with sheep and goat hunting seasons and would require significantly more pilot, staff, and financial resources than are currently available.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the establishment of smaller mountain goat hunt areas for Unit 13D remainder. The department currently has the authority to make this change, but the change would not increase hunting opportunity and may decrease harvest until such a time as changes in hunt success can be assessed.

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

PROPOSAL 56 - 5 AAC 85.040. Hunting seasons and bag limits for goats. Create an additional archery-only registration hunt for the RG580 hunt area in Units 11 and a portion of 13D.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? If adopted the proposal would create a new archery-only registration hunt for the RG580 hunt area in Units 11 and 13D with season dates of August 16–31 and a bag limit of one goat for residents and nonresidents (Figure 56-1). Registration permits would only be available in person in Anchorage, Fairbanks, Palmer, and Glennallen.

WHAT ARE THE CURRENT REGULATIONS? The current mountain goat hunting regulations can be found in 5 AAC 85.040 and the *2024–2025 Alaska Hunting Regulations*.

Hunters who wish to hunt mountain goats in Unit 11 or in Unit 13D south of the Tiekel River and east of a line beginning at the confluence of the Tiekel and Tsina rivers may do so under the following seasons and bag limits:

Resident and Nonresident hunters: 1 goat by registration permit (RG580), September 1–November 30.

Nonresident hunters must be accompanied by a guide or resident relative within the second degree of kindred.

There is a negative customary and traditional use finding for Mountain goats in Units 11 and 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted an additional 16 days of archery-only hunting opportunity would be available for residents and nonresidents hunting mountain goats in Unit 11 or in Unit 13D south of the Tiekel River and east of a line beginning at the confluence of the Tiekel and Tsina rivers (Figure 56-1). This additional hunting opportunity may be of particular interest to alpine hunters targeting areas where both sheep and goats are available prior to the existing September 1 season start date for mountain goats. This may be of particular interest for nonresident guided sheep hunters interested in taking a mountain goat as well as a sheep. Archery-only hunting opportunity is not likely to have high success, but 16 additional days of early hunting opportunity could still impact the overall harvest for the RG580 hunt area.

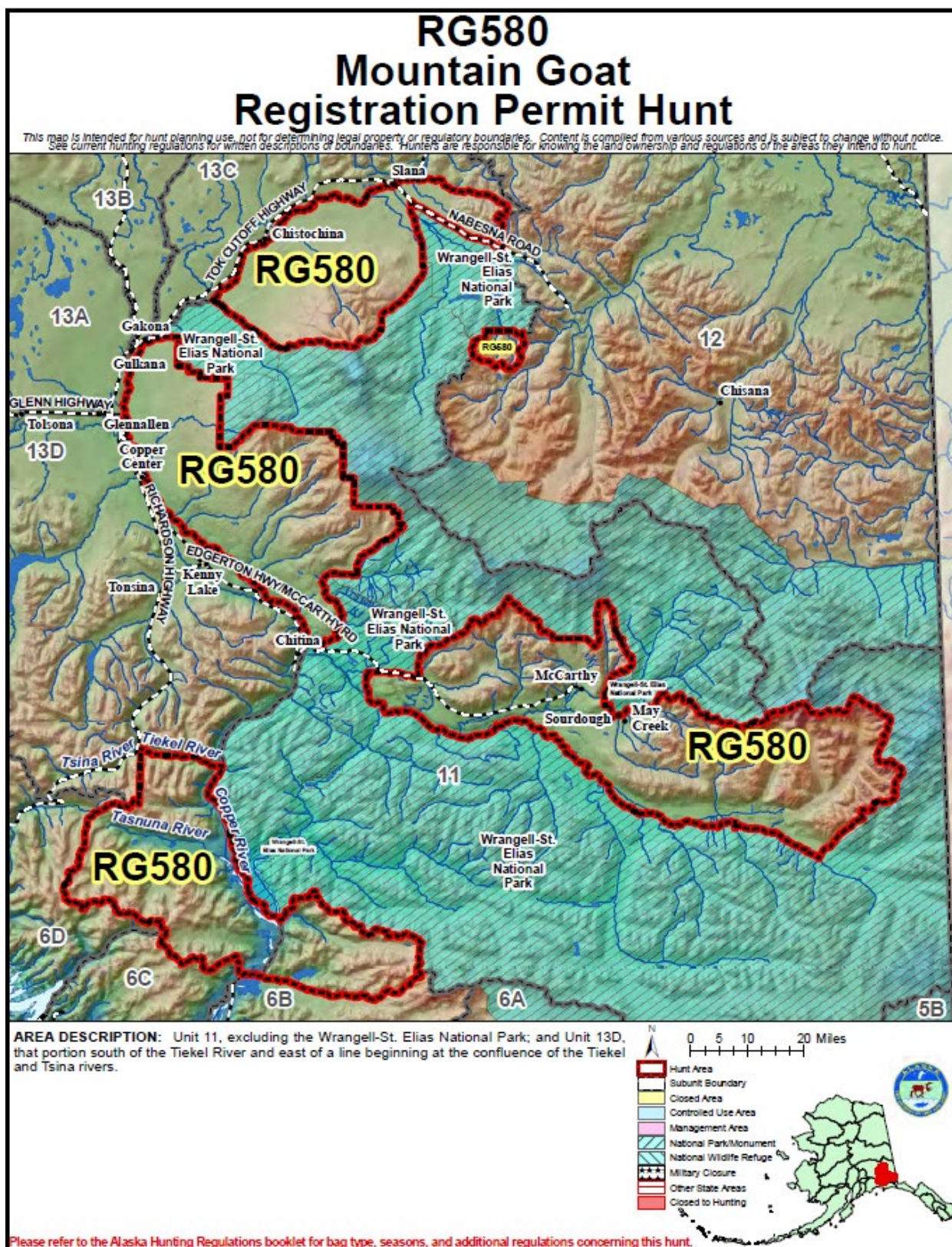


Figure 56-1. Registration goat hunt RG580 hunt area, Units 11 and 13D.

BACKGROUND: The RG580 hunt has been offered since RY2003 in Unit 11; the portion of the hunt area that reliably contains goats is mostly accessible by plane or boat, and a significant portion of Unit 11 is Wrangell St. Elias National Park, where this hunt opportunity does not apply. A portion of Unit 13D was added to the RG580 hunt area beginning in RY2007, which is accessible by plane, boat, or by hiking from the Richardson Highway. No mountain goats have been reported as harvested with archery equipment since this hunt was established. The hunt is especially popular among guided nonresident hunters in Unit 11 who are interested in harvesting a sheep and a goat, but with limited access to the area the overall interest and success at this time does not yet necessitate a quota for this registration goat hunt (Table 56-1). Minimum count surveys are conducted in a MacColl Ridge survey area annually in the spring before leaf-out obscures observations of goats, and these surveys suggest that despite a recent decline to numbers similar to those observed a decade ago, the population is currently stable and current harvest levels are sustainable (Table 56-2).

Table 56-1. Permits, hunters, and harvest in RG580 hunt, RY2014–2023.

RY	Permits	Hunted		Harvest		Total Harvest	% of harvest nonresident	% of harvest male
		Unit 11	Unit 13D	Unit 11	Unit 13D			
2014	38	15	4	7	2	9	78%	78%
2015	46	14	7	3	3	6	50%	83%
2016	43	14	12	7	6	13	77%	92%
2017	36	9	5	7	2	9	89%	89%
2018	22	4	8	2	3	5	100%	80%
2019	39	16	4	2	1	3	100%	67%
2020	34	15	8	6	5	11	73%	64%
2021	29	12	8	6	2	8	63%	63%
2022	42	23	2	10		10	60%	90%
2023	50	14	7	9	3	12	92%	92%

Table 56-2. Minimum count mountain goat observations, MacColl Ridge survey area in Unit 11, RY2014–2023.

RY	Adults	Kids	Total	% Kids
2014	44	13	57	23%
2015	47	4	51	8%
2016	66	13	79	16%
2017	69	18	87	21%
2018	60	3	63	5%
2019*	--	--	--	--
2020	67	5	72	7%
2021	55	7	62	11%
2022	40	10	50	20%
2023	44	9	53	17%

*No survey was conducted in RY2019.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means. Additional harvest in the RG580 area may necessitate the development of quotas for the RG580 hunt, which may require additional survey and inventory efforts. It is unclear if the additional archery-only harvest opportunity would result in an increase in mountain goat harvest in the RG580 hunt area..

COST ANALYSIS: Adoption of this proposal would not result in additional costs to the department. If harvest in the RG580 area increases then additional survey efforts may be necessary to establish appropriate quotas to avoid overharvest, which would require additional costs.

PROPOSAL 57 - 5 AAC 92.132. Bag limit for brown bears and 85.020 (a)(12) Hunting seasons and bag limits for brown bears. Increase the bag limit from one brown bear every regulatory year to two every regulatory year in Unit 13.

PROPOSED BY: Matanuska Valley Advisory Committee

WHAT WOULD THE PROPOSAL DO? The proposal would increase the bag limit for brown bears in Unit 13 from one bear every regulatory year to two bears every regulatory year. This would allow for the sale of brown bear hides harvested in Unit 13.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations can be found in 5AAC 85.020 and in the *2024–25 Alaska Hunting Regulations*.

Unit 13E within Denali State Park: one bear every regulatory year, August 10–June 15.

Unit 13 remainder: one bear every regulatory year, no closed season.

- Take of cubs or sows with cubs is prohibited.
- Take of brown bears over registered bait stations in Unit 13 is allowed, April 15–June 30, and brown bears may be taken at bait stations the same day a person has flown, provided the hunter is 300 feet from the plane at the attempt to take game.
- No resident locking tag is required.
- Brown bears must be sealed within 30 days of kill.

5 AAC 92.200 allows for the skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year to be sold under the conditions of a permit issued by the department. All bears intended for sale must be sealed as well.

There is a negative customary and traditional use finding for brown bear in Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the bag limit of brown bears would increase from one to two bears per regulatory year in Unit 13

and brown bear hides (with claws attached) and skulls could be sold after sealing. If adopted, the proposal will create additional harvest opportunity for hunters.

BACKGROUND: Brown bear population data are available for limited portions of Unit 13. Annual brown bear harvests in Unit 13 were relatively stable from the mid-1990s through the mid-2010s, ranging from 103 to 166. Harvest increased in regulatory year (RY) 13–18 when the take of brown bears over bait was allowed in Unit 13, but since then, the harvest has stabilized at slightly lower levels (Table 57-1). The most recent five-year average harvest (2018–2022) of 139 is similar to the previous five-year average of 142 bears annually (2013–2017), which was an increase over the previous five-year average of 135 bears (2008–2012).

In 2013, the spring harvest of brown bears over bait was allowed in Unit 13D, resulting in a 116% increase in the overall Unit 13D brown bear harvest. In 2013, 26 of 32 spring brown bear were harvested over bait. Harvest in Unit 13D dropped to more typical levels in 2014 but remained slightly higher in the following years (Table 57-1). During the spring of 2015 the harvest of brown bears over bait was allowed in all of Unit 13, and the overall harvest of brown bears increased by 49% compared to the previous year, with 41 of the 90 spring-harvested brown bears being taken over bait (Table 57-2). Harvest numbers are highest in Unit 13E and lowest in Unit 13C (Table 57-1). Differences in harvest levels between subunits can be attributed to multiple factors, including access, habitat, and overall subunit size. The percent of females in the Unit 13 harvest has increased in recent years, both in overall harvest and in harvest of bears over bait (Table 57-2). Bear baiting activity in Unit 13 has increased substantially since RY2013, with 247 bait stations registered in RY2023 (Table 57-3).

Table 57-1. Number of brown bears harvested in Unit 13 by subunit, regulatory years 2010 through 2023.

Regulatory Year	Unit 13A	Unit 13B	Unit 13C	Unit 13D	Unit 13E	Unit 13 Total
2010	34	18	3	27	56	138
2011	19	18	5	21	57	120
2012	24	20	12	25	48	129
2013 ¹	28	22	8	54	47	159
2014	10	14	10	24	45	103
2015 ²	20	25	16	37	55	153
2016	33	27	11	32	44	147
2017	26	31	7	30	54	148
2018	23	33	10	25	59	150
2019	28	28	12	27	39	134
2020	20	20	14	20	64	138

2021	23	26	16	30	37	132
2022	29	36	10	17	47	139
2023 ³	22	18	13	23	44	120
<i>Average⁴</i>	<i>24</i>	<i>24</i>	<i>10</i>	<i>28</i>	<i>50</i>	<i>138</i>

¹ First year of spring brown bear take over bait in 13D, 26 brown bears taken over bait.

² First year of spring brown bear take over bait in all of Unit 13, 41 brown bears taken over bait.

³ Harvest data has not been finalized for RY2023

⁴ Not including RY2023

Table 57-2. Brown bear harvest by season and percent females in harvest in Unit 13, regulatory years 2010 through 2022.

Regulatory Year	Fall	Fall Females (%)	Spring	Spring Females (%)	Bait	Baited Females (%)	Total	Total Females (%)
2010	104	38 (37)	34	13 (38)	n/a	-	138	51 (37)
2011	79	35 (44)	41	12 (29)	n/a	-	120	47 (39)
2012	89	37 (42)	40	13 (33)	n/a	-	129	50 (39)
2013 ¹	102	44 (43)	57	16 (28)	26	8 (31)	159	60 (38)
2014	65	27 (42)	38	13 (34)	13	3 (23)	103	40 (39)
2015 ²	63	28 (44)	90	33 (37)	41	13 (32)	153	61 (40)
2016	76	39 (51)	71	28 (39)	36	10 (28)	147	67 (46)
2017	85	39 (46)	63	26 (41)	30	13 (43)	148	65 (44)
2018	81	37 (46)	68	27 (40)	42	18 (43)	150	64 (43)
2019	65	31 (48)	69	30 (43)	39	17 (44)	134	61 (46)
2020	83	41 (49)	55	17 (31)	27	11 (41)	138	58 (42)
2021	69	30 (43)	62	31 (50)	29	13 (45)	131	61 (47)
2022	77	43 (56)	62	32 (52)	29	15 (52)	139	75 (54)

¹ First year of spring brown bear take over bait in 13D, 26 brown bears taken over bait.

² First year of spring brown bear take over bait in all of Unit 13, 41 brown bears taken over bait.

Table 57-3. Number of registered bear bait stations in Units 13 by subunit, regulatory years 2010 through 2023.

Regulatory Year	Unit 13A	Unit 13B	Unit 13C	Unit 13D	Unit 13E	Unit 13 Total ¹
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2010	16	1	6	62	33	118
2011	22	3	4	95	29	153
2012	11	1	4	107	30	153
2013 ¹	17	1	8	139	25	198
2014	13	2	12	155	33	224
2015 ²	34	24	23	139	47	274
2016	24	25	17	142	44	262
2017	25	31	18	145	49	284
2018	20	26	12	138	62	279
2019	22	23	18	114	52	232
2020	39	25	7	124	52	247
2021	36	17	12	122	48	235
2022	29	19	11	121	47	227
2023	48	31	8	111	49	247
<i>Average</i>	<i>22</i>	<i>15</i>	<i>12</i>	<i>124</i>	<i>41</i>	<i>209</i>

¹ Includes bait stations coded to 13Z.

² First year of spring brown bear take over bait in 13D, 26 brown bears taken over bait.

³ First year of spring brown bear take over bait in all of Unit 13, 41 brown bears taken over bait.

In 1995, the board established a goal to reduce the population of brown bears in Unit 13 by increasing harvest opportunity while maintaining a minimum of 350 independent brown bears unitwide. The intention of this goal was to improve survival for moose calves. A baseline study was conducted in 1998 that determined a brown bear density estimate of 21.3 independent bears per 1,000 km² (95% CI=18.3–25.9). Based on an aerial capture-mark-resight survey done on bears in 2011 in Unit 13A, there was a 25–40% reduction in brown bear densities compared to the baseline study, with 13.0 independent bears per 1,000 km² estimated in 2011. Brown bear population density in the Unit 13A study area declined by 4% annually for independent bears and 2% annually for total number of bears (dependent cubs included) and harvest rates were estimated to be greater than 8% annually. This study was repeated in 2022 although there was slight modification to the study area to improve sampling. This change makes comparability with 2011 difficult, but preliminary analyses suggest that the brown bear population in the Unit 13A study area has stabilized at a level lower than 1998 and shows some increase in the total number of bears since 2011. The density of independent bears (which are subjected to hunting) have generally remained the same (2011:13/1,000 km² vs 2022: 14.8/1,000 km²) with average annual harvests prior to, and after 2011, of 140 and 138 respectively. While the density estimate for the Unit 13A study area may not be applicable to all other parts of Unit 13, these estimates serve as an index for the brown bear population over time. The generally lower population density for brown bears compared to the 1998 baseline is believed to be applicable to the Unit 13 population as a whole and the population is no longer in decline. An additional genetic mark-recapture study designed to provide additional insight and validation on the 2011/2022 capture-mark-resight population work is expected to be finalized soon.

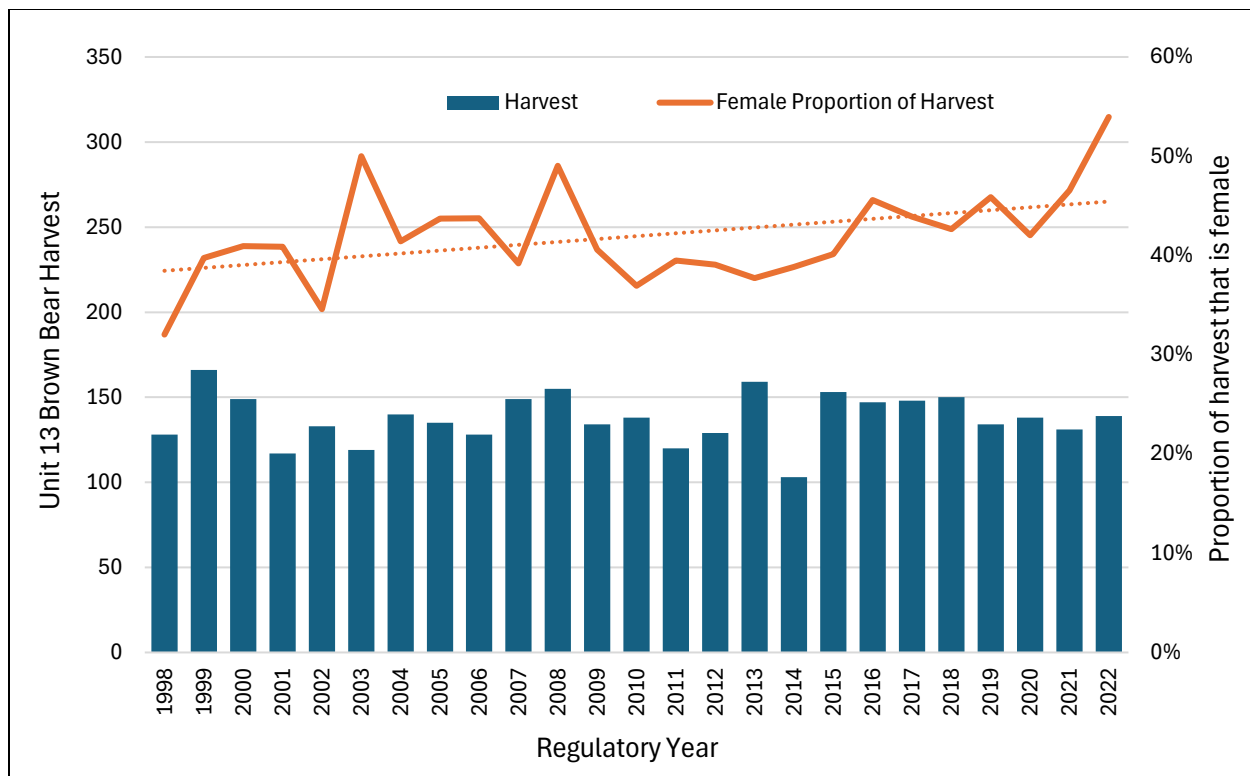


Figure XX-1. Unit 13 brown bear harvest and proportion of harvest comprised by females, RY98–22.

2022 preliminary analyses support the protection of females and dependent offspring within the study population as a sufficient safeguard to avoiding sharp declines in population numbers at current harvest rates. Hunters often report seeing far more sows with cubs in Unit 13 than independent bears without cubs. Preliminary data suggests the population is being maintained at more than 350 independent brown bears in Unit 13, which is consistent with board guidance.

It is unclear if adoption of this proposal will result in additional brown bear harvest in Unit 13. Nonresident hunters are still required to be accompanied by a guide or resident relative within second degree of kindred to hunt brown bears, which is likely a limiting factor for those hunters.

Current brown bear harvest pressure is highest in areas with road access to public lands, especially those areas that are within closer driving distance to large population centers such as Anchorage and the Mat-Su Valley. Unit 13C receives less harvest pressure, as public lands are relatively further away and/or more difficult to access. This area may have relatively higher brown bear densities compared to 13A but increasing the brown bear bag limit for all of Unit 13 is not likely to focus harvest efforts to localized subunits where brown bear densities may be higher.

Two bear bag limits are available to hunters in nearby Units 12 and 16. The harvest data from these units were used to determine potential additional harvest if this proposal is adopted. The bag limit in Unit 12 increased to two bears in RY2024 and, of the successful hunters in that unit in the fall of 2024, no hunter harvested two bears. The bag limit in Unit 16A was increased to two bears per

year in RY2018 and, of the 129 brown bears taken since then, only 10 hunters in Unit 16A have sealed more than one bear in a year (1 in RY2018, 0 in RY2019, 2 in RY2020, 3 in RY2021, 2 in RY2022, 1 in RY2023, and 1 in RY2024).

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to increase the brown bear bag limit in Unit 13. Although the brown bear population in Unit 13A declined after 1998, the recent Unit 13A population index suggests that the population is no longer in decline and has, at a minimum, stabilized. The 2022 index of all bears did show growth in Unit 13A. However the department is cautious in applying the population index across subunits and unit-wide. Some subunits such as 13C may have higher brown bear densities than others, but limitations such as access are likely to mitigate the potential for increased brown bear harvest if the bag limit is increased to two brown bears. It is not clear whether increasing the brown bear bag limit will result in increased harvest of brown bears in Unit 13 as a whole. As noted above the number of female bears harvested has increased. The department will monitor this closely but at this time there is not a conservation concern.

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

PROPOSAL 58 – 5 AAC 92.121. Intensive Management Plan V. Reduce the minimum wolf population objective in the Unit 13 Intensive Management Plan.

PROPOSED BY: Copper Basin Advisory Committee

WHAT WOULD THE PROPOSAL DO? If adopted the existing Intensive Management Plan for Unit 13 would be modified to establish a late winter minimum abundance of 100 wolves, down from 135–165.

WHAT ARE THE CURRENT REGULATIONS? There is a positive customary and traditional use finding for wolves in Unit 13 with an amount reasonably necessary for subsistence of 8–24 wolves.

5 AAC 92.121. Intensive Management Plan V:

(a) Plan established. The intensive management plan for the Unit 13 Wolf Predation Control Area is established in this section. (b) Unit 13 Wolf Predation Control Area: the Unit 13 Predation Control Area is established and consists of all lands within Units 13(A), 13(B), 13(C), 13(D), and that portion of Unit 13(E) east of the Alaska Railroad, except National Park Service and other federal lands where same-day-airborne take of wildlife is not allowed, encompassing approximately 21,066 square miles. The control program for this area is as follows: (1) this is a continuing control program that was first authorized by the board in 2000 for wolf control; it is currently designed to increase moose numbers and harvest by reducing predation on moose by wolves, thereby improving recruitment rates, and is expected to make a contribution to achieving

the intensive management (IM) objectives in Unit 13; (2) moose and wolf objectives are as follows: (A) moose IM objectives for Units 13(A), 13(B), 13(C), 13(D), and 13(E) as established in 5 AAC 92.108 are 3,500 - 4,200, 5,300 - 6,300, 2,000 - 3,000, 1,200 - 1,900, and 5,000 - 6,000 moose respectively; (B) the moose harvest objectives for Units 13(A), 13(B), 13(C), 13(D), and 13(E) as established in 5 AAC 92.108 are 210 - 420, 310 - 620, 155 - 350, 75 - 190, and 300 - 600 moose respectively; (C) the department adopted 135 - 165 wolves as the late winter minimum abundance for Unit 13; maintaining this minimum population size will allow for sustained yield of wolves and will ensure that wolves persist in the control area; (3) board findings concerning populations and human use are as follows: (A) moose harvest has been consistently below IM objectives in Units 13(B), 13(C), and 13(E); (B) predation by wolves is an important cause of the failure to achieve population and harvest objectives; (C) a reduction in wolf predation in Unit 13 can reasonably be expected to make progress toward achieving the Unit 13(A), 13(B), 13(C), 13(D), and 13(E) IM objectives for moose; (D) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information; (E) reducing predation is likely to be effective given land ownership patterns, and (F) reducing predation is in the best interest of subsistence users; Unit 13 has long been an important hunting area for subsistence by local area residents and much of the state's population in Anchorage, the Matanuska-Susitna Valley, as well as Fairbanks and other communities around the state; it is recognized under the state's intensive management law as an area where moose are to be managed for high levels of human consumptive use; (4) authorized methods and means are as follows: (A) hunting and trapping of wolves by the public in the Unit 13 Wolf Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles; (B) notwithstanding any other provisions in this title, the commissioner may issue public aerial permits or public land-and-shoot permits as a method for wolf removal under AS 16.05.783; (5) time frame is as follows: (A) through July 1, 2031, the commissioner may authorize the removal of wolves in the Unit 13 Wolf Predation Control Area; (B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan; (6) the commissioner will review, modify or suspend program activities as follows: (A) when the mid-point of the IM population and harvest objectives for the moose population is achieved; (B) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers below the management objective of 135 wolves specified in this subsection; (C) if after three years, the harvest of wolves is not sufficient to make progress towards the intensive management population objectives for wolves; (D) predation control activities may be suspended (i) if after three years, there is no detectable increase in the total number of moose in the control area; (ii) if after three years, any measure such as estimates of rump fat, short-yearling mass, and twinning rates, consistent with significant levels of nutritional stress in the moose population are identified; (iii) when the moose population and harvest objectives within Unit 13 predation control area have been

met. (c) Habitat Enhancement. The department may plan and execute habitat enhancement projects in areas identified for improvement based on evidence at the landscape or population level through prescribed burns, wildfire, or mechanical means to increase the potential carrying capacity across the range in Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Wolf control in Unit 13 is currently activated or suspended on a subunit level based on moose population status for each subunit. Most often at least one subunit is not active for IM to ensure a minimum of 135 wolves remain in the Unit as required by the adopted IM plan. If this proposal were adopted and the minimum number of wolves is reduced, it may be feasible to have wolf control active in all Unit 13 subunits in a given winter if moose populations in all subunits warrant active wolf control.

BACKGROUND: The Intensive Management plan that establishes the Unit 13 Wolf Predation Control Area has been in place since RY2001, although Unit 13C was not added until RY2005 and Unit 13D was not added until RY2022. Wolf control occurs in the winter, when snow conditions allow for effective tracking and removal of wolves. Wolf control is not activated in a subunit until moose composition and minimum count surveys are completed and moose population status is assessed in November, for a wolf control start date of January 1. Starting control in January also gives trappers from October 15 to December 31 to trap without competing with control activities. The current trapping and control seasons are set in consideration of allocation between trappers and SDA pilots.

The current Intensive Management plan is for moose in Unit 13; objectives are set for moose and wolves. Nelchina caribou are not included in the current plan. In most years the majority of the Nelchina caribou herd leaves Unit 13 in the winter, although that may change because caribou numbers have declined which may change the distribution of wintering caribou. Even so, Nelchina caribou calve in Unit 13A, spend most of the summer in 13A and 13E, spend some time in the summer and fall in 13B, and often migrate through 13C, but adult survival during these portions of the year is generally very high.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of wolves between user groups, and recommends the board adopt a range rather than a single number objective to allow for flexibility in determining when to stop control efforts. The department has no biological concern for the wolf population at the proposed level or below that level. The department is not concerned about the sustainability of the wolf population and would consider a goal of 0 wolves in the predation control area biologically sustainable as wolves have high reproductive rates, readily disperse, and the control area has sufficient refugia within and around it to allow rapid recolonization. It is reasonable to assume, however, that a decrease in wolf abundance in Unit 13 could potentially have an impact on herd recovery, especially if portions of the herd choose to winter in Unit 13. That said, reducing the minimum number of wolves in Unit 13 from a range of 135-165 to 100 is not likely to have a measurable effect on Nelchina caribou population recovery. The Intensive Management plan in question is for moose, not caribou, and if

the proposal is adopted it is not likely to have a measurable effect on the population recovery of the Nelchina caribou herd. The department recommends the board amend the proposal to allow department staff to conduct wolf control. Conditions, access and interest from the public have been sufficient to reduce wolf numbers when the program is active, however there may be a time when it is appropriate for the department to conduct wolf removal and at the moment the option for department removal is not in the plan. If the board wants to create an intensive management plan to benefit the Nelchina caribou herd the department recommends the board create, with input from the department, a separate plan with appropriate predator and prey objectives and methods of removing specific predators that suppress caribou herd numbers, and that the plan include the ability for department staff to conduct control efforts which includes the removal of bears and wolves.

COST ANALYSIS: Adoption of this proposal is not expected to increase costs for the department.

PROPOSAL 59 - 5 AAC 84.270. Furbearer trapping. Lengthen the wolf trapping season in Unit 11.

PROPOSED BY: Wrangell St. Elias National Park Subsistence Resource Commission

WHAT WOULD THE PROPOSAL DO? If adopted the proposal would lengthen the wolf trapping season by 56 days, changing both the start and end date. The current season is November 10–March 31 and the proposed season is October 15–April 30.

WHAT ARE THE CURRENT REGULATIONS? The current wolf trapping regulations can be found in 5 AAC 84.270 and in the *2024-2025 Alaska Trapping Regulations*.

5 AAC 84.270

Species and Units	Open Season	Bag Limit
(13) Wolf		
...		
Units 6, 11, 14(A), and 18	Nov. 10 – Mar. 31	No limit.
...		
Units 12, 13, and 16	Oct. 15 – Apr. 30	No limit.
...		

Wolves can also be harvested in Unit 11 with a hunting license; the bag limit is 5 wolves and season dates are August 10–April 30.

Federally qualified subsistence users can harvest wolves on federal lands in Unit 11 under federal hunting and trapping regulations:

- The federal subsistence wolf hunting season is August 10–April 30 with a bag limit of 10 wolves.
- The federal subsistence wolf trapping season is November 10–March 31 with no bag limit.

There is a positive customary and traditional use finding for wolves, whether taken as furbearer or big game, in Unit 11. The amount reasonably necessary for subsistence is 5–10 wolves.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted it would align the Unit 11 wolf trapping season with the wolf trapping seasons in Units 12 and 13 and misalign the Unit 11 wolf trapping season with the federal subsistence wolf trapping season in Unit 11, as well as state and federal coyote trapping seasons in Unit 11. The board will deliberate Proposal 60 to lengthen the coyote trapping season in Unit 11 to October 15 – April 30. Under state regulations the current hunting season allows for the take of wolves during the proposed dates, without the use of traps or snares. Extending the trapping season is not expected to increase wolf harvest but could potentially result in the incidental trapping of other species.

BACKGROUND: Wolf harvest in Unit 11 averaged 16 wolves annually over the past 10 years, ranging from 7 to 32 wolves harvested each year (Table 59-1). Wolves taken by hunters and trappers ground shooting are typically harvested in August or September, when hunters are also on the landscape for sheep and moose hunting seasons (Table 59-2). Wolf trapping is not expected to receive significant effort or success in October, when things are just starting to freeze-up and conditions are difficult for travel and for tracking wolves. Harvest of wolves by traps and snares in Unit 11 generally begins in December and most harvest occurs in January and February, when trapping conditions improve (Table 59-3). Trapping and travel conditions typically deteriorate significantly in April and wolf trapping effort and success are both likely to be low during that month.

Table 59-1. Wolves harvested in Unit 11 by method of take, regulatory year (RY) 2014–2023.

Regulatory Year	Ground Shooting	Trap/Snare	Total
2014	2	6	8
2015	1	12	13
2016	3	24	27
2017	2	10	12
2018	2	30	32
2019	3	11	14
2020	5	16	21
2021	8	6	14
2022	3	4	7
2023	6	5	11

Table 59-2. Chronology of wolves harvested in Unit 11 by ground shooting, RY2014–2023.

Regulatory Year	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total Wolves
2014	0%	100%	0%	0%	0%	0%	0%	0%	0%	2
2015	0%	100%	0%	0%	0%	0%	0%	0%	0%	1
2016	0%	67%	0%	0%	0%	0%	0%	0%	33%	3
2017	0%	50%	50%	0%	0%	0%	0%	0%	0%	2
2018	50%	50%	0%	0%	0%	0%	0%	0%	0%	2
2019	33%	67%	0%	0%	0%	0%	0%	0%	0%	3
2020	40%	40%	0%	20%	0%	0%	0%	0%	0%	5
2021	13%	75%	0%	13%	0%	0%	0%	0%	0%	8
2022	0%	67%	0%	0%	33%	0%	0%	0%	0%	3
2023	50%	33%	17%	0%	0%	0%	0%	0%	0%	6

Table 59-3. Chronology of wolves harvested in Unit 11 by ground shooting, RY2014–2023.

Regulatory Year	Nov	Dec	Jan	Feb	Mar	Total Wolves
2014	33%	0%	0%	67%	0%	6
2015	0%	25%	0%	42%	33%	12
2016	0%	8%	54%	21%	17%	24
2017	0%	10%	60%	20%	10%	10
2018	0%	30%	27%	37%	7%	30
2019	0%	64%	0%	36%	0%	11
2020	0%	6%	6%	81%	6%	16
2021	0%	17%	33%	17%	33%	6
2022	25%	0%	50%	25%	0%	4
2023	20%	0%	40%	20%	20%	5

Wolf pelts in recent years have averaged between \$112 and \$265 per pelt annually but fur will not be prime during the proposed season extension and pelts are not likely to be as valuable if harvested during the extended season dates.

DEPARTMENT COMMENTS: The department **SUPPORTS** extending the trapping season for wolves in Unit 11. There is currently no biological concern for the wolf population in Unit 11 and additional animals are available for harvest. If adopted, this proposal is not expected to increase wolf harvest substantially. Access and effort limit the number of wolves harvested in Unit 11, and extending season dates does not alter these factors.

COST ANALYSIS: Adoption of this proposal is not expected to increase costs for the department.

PROPOSAL 60 – 5 AAC 84.270. Furbearer trapping. Lengthen the coyote trapping season in Unit 11.

PROPOSED BY: Wrangell St. Elias National Park Subsistence Resource Commission

WHAT WOULD THE PROPOSAL DO? If adopted the proposal would lengthen the coyote trapping season by 56 days, changing both the start and end date. The current season is November 10–March 31 and the proposed season is October 15–April 30.

WHAT ARE THE CURRENT REGULATIONS? The current coyote trapping regulations can be found in 5 AAC 84.270 and in the *2024-2025 Alaska Trapping Regulations*.

5 AAC 84.270

Species and Units	Open Season	Bag Limit
(2) Coyote		
...		
Units 6, 9-11, 13, 14(A), 14(B), and 16-18	Nov. 10 – Mar. 31	No limit.
...		
Units 12 and 20(E)	Oct. 15 – Apr. 30	No limit.
...		

Coyotes can also be harvested in Unit 11 with a hunting license; there is no closed season and no bag limit for coyote hunting.

Federally qualified subsistence users can harvest coyotes on federal lands in Unit 11 under federal hunting and trapping regulations:

- The federal subsistence coyote hunting season is August 10–April 30 with a bag limit of 10 coyotes.
- The federal subsistence coyote trapping season is November 10–March 31 with no bag limit.

There is a positive customary and traditional use finding for coyotes in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted it would misalign the Unit 11 trapping season from all other coyote trapping seasons in Region IV, including Unit 13, as well as from the federal subsistence coyote trapping season in Unit 11. It would also misalign the Unit 11 coyote trapping season from the current wolf trapping season, although there is a proposal submitted to extend the Unit 11 wolf trapping season

as well (Proposal 59). Under state regulations the current hunting season allows for the take of coyotes during the proposed dates, without the use of traps or snares. Extending the trapping season is not expected to increase coyote harvest but could potentially result in the incidental trapping of other species.

BACKGROUND: Coyotes trapped or harvested are not required to be sealed, and harvest trends are only available through the annual *Alaska Trapper Questionnaire*. The *2022 Alaska Trapper Report* suggests that, for coyotes harvested under trapping regulations in Region IV, 57% are snared, 29% are caught in foothold traps, 7% are caught in conibear body-hold traps, and 7% are shot. Coyotes in Region IV are considered to be relatively scarce, and no harvest of coyotes through trapping in Unit 11 was reported in the 2022 Trapper Questionnaire. Coyote trapping is not expected to receive significant effort or success in October, when the ground is starting to freeze and conditions are difficult both for travel and for tracking coyotes. Trapping and travel conditions also begin to deteriorate in April and coyote trapping effort and success are both likely to be low during that month.

Coyote pelts in recent years have averaged \$47–\$77 per pelt but fur will not be prime during the proposed season extension and pelts are not likely to be very valuable if harvested during the extended season dates.

DEPARTMENT COMMENTS: The department **SUPPORTS** extending the trapping season for coyotes in Unit 11 because there is currently no biological concern for the coyote population. Adoption of this proposal is not expected to increase coyote harvest substantially. Access and effort limit the number of coyotes harvested in Unit 11, and extending season dates does not address those factors.

COST ANALYSIS: Adoption of this proposal is not expected to increase costs for the department.

PROPOSAL 61 – 5 AAC 85.065. Seasons and bag limits for small game. Change the start date for the ptarmigan hunting season in Unit 13B

PROPOSED BY: Paxson Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would shorten the ptarmigan hunting season by 10 days in Game Management Unit (Unit) 13B, by starting on August 20 instead of August 10.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

...

Units and Bag Limits

Resident & Nonresident Open Season (Subsistence & General Hunts)

Unit 13B and 13E
10 per day, 20 in possession

Aug. 10 – Feb. 15

....

There is a positive customary and traditional use (C&T) finding for ptarmigan in Unit 13. The board has not determined an amount reasonably necessary for subsistence (ANS).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, juvenile ptarmigan would have 10 additional days to grow in size. In addition, this regulatory change would result in a decrease in hunting opportunity and associated harvest for the month of August within Unit 13B.

BACKGROUND: The current hunting season framework has been in place since RY2018, with the season opening on August 10 since at least 1986. With the exception of the Eklutna Management Area within Unit 14C, most other ptarmigan hunting seasons begin on or before August 10, with Unit's 1–5, 6A, 6B, and 6C starting August 1.

The department conducts both spring breeding and late-summer brood surveys annually within Unit 13B. This provides staff biologists with firsthand observations of both the relative abundance of breeding adults in the area during the spring, and an index of relative recruitment of juvenile birds into the population at the end of the brood season. Brood surveys in particular are typically conducted between July 15 and the first week of August just before the start of the hunting season on August 10, depending on weather and volunteer availability.

Based on ADF&G brood survey observations, as well as research projects completed on rock ptarmigan in Unit 13B and willow ptarmigan in Unit 13E, juvenile ptarmigan are typically smaller than adults at the start of the hunting season on August 10.

Based on hunter-harvested ptarmigan wings submitted to the Division of Wildlife Conservation, the months of August and September are two of the highest hunter harvest months throughout the current season in Unit 13B, and especially after the regulatory change in 2018 that resulted with the season ending on February 15 in Unit 13B. Effort and therefore harvest of ptarmigan during August is likely higher during years when Nelchina caribou hunting takes place, as people hunting ungulates (e.g., caribou, moose, sheep, etc.) often harvest ptarmigan opportunistically.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to shorten the ptarmigan season in Unit 13B by 10 days by delaying the start date. While juvenile ptarmigan are typically smaller than adults at the start of the hunting season on August 10, a variety of factors (e.g., spring nest initiation, nest predation and re-nesting, brood season weather conditions, etc.)

may introduce substantial year-to-year variation in juvenile body size by this date. An extra 10 days would provide additional time for juvenile growth and dispersal from road-accessible nesting locations, but some juvenile birds likely still would not be comparable in size to adults if the season began 10 days later on August 20. To reduce hunter confusion if adopted, the department recommends the board consider adopting the same start date for Unit 13E as well, as the entirety of the Denali Highway falls within Units 13B and 13E.

Furthermore, if adopted, the board should consider whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting a ptarmigan for subsistence uses.

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

PROPOSAL 62 – 5 AAC 85.065. Hunting season and bag limits. Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D.

PROPOSED BY: Jonathon Green

WHAT WOULD THE PROPOSAL DO? This proposal would extend the ptarmigan hunting season in Game Management Units (Units) 13A, 13C, and 13D by an additional 30 days from March 31st through April 30th.

The proposal lists two potential options:

1. August 10th – April 30th, while maintaining the bag limit of 10 ptarmigan per day, 20 in possession.

OR

2. August 10th – March 31st, with a bag limit of 10 ptarmigan per day, 20 in possession, decreasing to 5 ptarmigan per day, 10 in possession from April 1st – April 30th.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

...

Units and Bag Limits

Unit 13A, 13C, 13D,
10 per day, 20 in possession

**Resident & Nonresident Open Season
(Subsistence & General Hunts)**

Aug. 10 – Mar. 31

...

There is a positive customary and traditional use (C&T) finding for ptarmigan in Unit 13. The board has not determined an amount reasonably necessary for subsistence (ANS).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would provide additional hunting opportunity. The proposed extension would occur during the spring breeding period for ptarmigan within units 13A, 13C, and 13D.

BACKGROUND: The current hunting season length has been in place within units 13A, 13C, and 13D since 1990 (34 years). Since 1990, bag limits have changed 5 times in Unit 13A and only once within units 13C and 13D. The majority of other units that have seasons extending through or beyond the month of April are completely off the road system or are away from major human population centers. The exceptions being units 12, 20, and 25C, where in 2004 the Board of Game (BOG) gave ADF&G the authority to adjust season dates and bag limits by emergency order. Since 2004, late-season (March 1-April 30) bag limits in units 12, 20, and 25C have been reduced from 20 to 5 per day and from 40 to 10 in possession to protect the breeding population of ptarmigan in accessible areas within those units.

Voluntarily submitted hunter-harvested ptarmigan samples from across the state (RY2011-2023) submitted to ADF&G suggest harvest is high in the fall, relatively low during the winter, followed by an increase in the spring. The increase in harvest in the spring coincides with the return of longer days and warmer temperatures and generally good snow conditions for snowmachine travel. Specific to Unit 13 (All subunits; RY2011-2023), roughly 50% of the hunter-harvested ptarmigan samples submitted came from the month of March. This suggests late-season harvest would likely continue at high levels if the season were extended through the month of April. Two different harvest scenarios are proposed, one maintaining the same bag limit (10 per day, 20 in possession) through the entirety of the season, and a second providing a reduced bag limit (5 per day, 10 in possession) through the month of April. While a reduced bag limit scenario may seem like a logical compromise for extending the hunting season into the breeding season, two separate small game hunter surveys showed the average daily ptarmigan harvest per hunter in Unit 13 was less than 2 ptarmigan per day. This suggests a daily bag limit reduction from 10 per day to 5 per day for the month of April likely would not offset the concentrated harvest and effort introduced by extending the season another 30 days.

Research from an ADF&G study on willow ptarmigan in Unit 13E between 2013 and 2015, identified reduced survival rates for ptarmigan at road-accessible sites in comparison to birds at remote sites in the fall (Aug – Nov), but no difference in survival rates after birds had dispersed from breeding sites (both remote and accessible) in the winter (Dec – Mar). Similarly, an ADF&G study on rock ptarmigan in Unit 13B between 2013 and 2017 found a higher risk of mortality for birds ≤ 3 km from a road during the fall in comparison to birds ≥ 3 km from a road. Both willow

and rock ptarmigan captured during these studies showed strong site fidelity to breeding locations along the Denali Highway and at more remote locations. These findings, along with the data from hunter-harvested samples, support the concept of high harvest taking place at road-accessible locations in the fall and suggest a similar outcome will occur if seasons extend too far into the spring breeding period in nearby Units 13A, 13C, or 13D.

Because by mid-April ptarmigan are already establishing and defending breeding territories, late-season harvest mortality is likely additive (i.e., adds additional mortality beyond what is expected naturally) and would likely lead to reduced spring breeding densities. Consequently, increasing the amount of late-season harvest, may result in localized depletion, and particularly at accessible sites near roads. Recent regulatory changes to address localized depletion within nearby units 13B and 13E resulted in shortened season lengths in 2018 due to low relative abundance estimates from along the Denali Highway corridor. Furthermore, in recognition of these changes, the Federal Subsistence Board passed a Special Action Request proposed by the Denali Regional Advisory Council (RAC) in the fall of 2019, aligning federal subsistence seasons with the revised state season dates.

Extending ptarmigan hunting seasons further into the spring breeding period of the annual lifecycle of ptarmigan may be less concerning in areas with minimal or no road access and low human harvest pressure.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If this proposal were adopted, it would provide an additional 30 days of ptarmigan hunting within these units, at the potential cost of a substantial reduction in the number of breeding individuals around areas accessible from the road system.

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

PROPOSAL 63 – 5 AAC 85.065 Hunting seasons and bag limits for small game. Require a registration permit to hunt ptarmigan in Unit 13B and 13E.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal will require hunters to obtain a registration permit to hunt ptarmigan in Unit 13B and 13E.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065 Hunting seasons and bag limits for small game

Resident & Nonresident Open Season

Units and Bag Limits

(Subsistence & General Hunts)

Unit 13B and 13E

Aug. 10 – Feb. 15

10 per day, 20 in possession

....

There is a positive customary and traditional use (C&T) finding for ptarmigan in Unit 13. The Board of Game (board) has not determined an amount reasonably necessary for subsistence (ANS).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All hunters would be required to obtain a registration permit to hunt ptarmigan in Game Management Subunits 13B and 13E. It would allow the department to collect harvest data that is otherwise unavailable. With access to this harvest data the department would be better able to make recommendations to the board regarding proposals seeking to adjust season dates or bag limits for ptarmigan in Units 13B and 13E. All ptarmigan hunters, including those under the age of 10 would be required to obtain a registration permit before hunting ptarmigan, and all hunters would be required to report or would be subject to the penalties associated with failing to report.

BACKGROUND: Units 13B and 13E have long been a popular destination for ptarmigan hunters, especially with the amount of motorized vehicle access along the Denali Highway and the advancement of off-road vehicles and snowmachines. Concerns over the effects of late season harvest mortality and localized depletion in areas that received heavy hunting pressure were first presented to the board in 2009 after years of steady decline in spring breeding densities of ptarmigan within Unit 13B. The board acted by shortening the ptarmigan hunting season in Unit 13B (from August 10 to March 31 to August 10 to November 30). The board took additional regulatory action in 2018, aligning the season closure dates in Units 13B and 13E to February 15. This decision was made after research suggested that mortality from hunting during the fall and late winter was not compensatory but rather additive (i.e., adds additional mortality beyond what is expected naturally). This decision was seen as a compromise between ADF&G's conservation concerns about additive mortality of late season harvest and public interest in additional hunting opportunity in the area.

Annual spring breeding surveys and survival rates (accessible versus inaccessible ptarmigan populations) from relevant research have proven to be useful in recent board deliberations. Voluntary hunter-harvested wing collections have also proven useful, primarily in estimating age composition of the harvest. Harvest estimates are a vital component of effective management of any hunted species or population. However, the department currently does not require any kind of harvest or hunter effort data.

The intent of this proposal is to engage the Board on discussing and exploring possible solutions for collecting ptarmigan harvest data from an area that receives heavy hunting pressure and has

historically experienced multiple regulatory changes resulting from proposals submitted by members of the public, local advisory committees, and department staff.

DEPARTMENT COMMENTS: The department submitted this proposal and at this time asks the board to **WITHDRAW** the proposal. Following submission of this proposal department staff have discussed it internally and with hunters to evaluate the need for a ptarmigan registration permit and its likely effectiveness in future management. When weighing the benefits to the resource against the burden placed on hunters by a registration hunt, and considering there is currently no conservation concern for ptarmigan in Units 13B and 13E, department staff believe a ptarmigan registration permit is not the approach to take at this time.

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

PROPOSAL 64 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Reauthorize the antlerless moose draw permits in Units 14A and 14B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts must be re-authorized annually by the board to comply with statutory requirements.

WHAT ARE THE CURRENT REGULATIONS? Units 14A and 14B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations for Units 14A&B can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

- The department has the authority to issue up to 2,000 drawing permits to resident hunters in Unit 14A with a bag limit of one antlerless moose. The season is August 25–September 25 for DM400–DM410 and YM412, November 1–November 30 for DM413 and December 1–December 25 for DM414.
- The department may also issue up to 200 permits to resident hunters for the targeted hunt in Unit 14A with a bag limit of one moose during a winter season, which is to be announced by emergency order.

The department may also issue up to 100 additional permits to resident hunters for a targeted hunt in Unit 14B with a bag limit of one moose during a winter season, which is to be announced by emergency order.

Moose in Unit 14A have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,000–6,500 moose and 360–

750, respectively. Moose in Unit 14B have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 2,500–2,800 moose and 100–200, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts are needed to keep the moose population within management objectives and provide additional hunting opportunity for residents. The targeted hunt also provides managers with a tool to reduce moose-vehicle collisions and address nuisance moose issues.

BACKGROUND: Moose surveys conducted in November of 2023 provided an estimate of 6,657 (± 810 ; 80% CI) moose in Unit 14A. This is less than the 2020 population estimate of 7,112 however it is greater than the population objective of 6,000–6,500 moose. Twinning surveys conducted in the spring of 2024 showed a twinning rate of 28%, the highest since 2017: this is indicative of a population that should be managed for stability. The twinning rate has been increasing since 2021 which suggests that the population productivity is increasing as the population is being brought closer to the population objective.

The number of antlerless permits issued was raised in spring of 2011 from 400 to 1,000. Due to the heavy snows that same winter, there were no antlerless permits issued in 2012. Subsequent surveys indicated that the moose population was not adversely affected by the winter of 2011 and was continuing to grow. The department manages moose adaptively and the number of permits issued was raised to the limit of 1,000 permits for the fall of 2017. In spring of 2018 the board increased the permit levels to 2,000 permits and 1,302 permits were issued for RY18 and 1,310 in RY19. The antlerless permits were reduced to 800 in RY21 and RY22, 367 in RY23, and then reduced again to 199 in RY24. The success rate for hunters under the antlerless permits has remained steady at about 49% over the past 3 years.

The targeted moose hunt in Units 14A and 14B provides an additional tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. The targeted hunt (AM415) has been in place since 2012. Under this permit, hunters are either designated a specific nuisance moose to take or are assigned one of four areas where a high number of moose–vehicle collisions are known to occur. In this scenario permits are issued as snow increases and moose become more prevalent along roadways. The winter of 2014 was very mild with almost no snow. As a result, only 20 permits were issued that year. No permits were issued in the winters of 2017–2023. For the years that permits were issued, on average 143 permits were issued, and 110 moose were taken, providing an average success rate of 77%.

The Unit 14A moose population has exceeded population objectives for the past 12 years and has the potential for large increases in a relatively short amount of time. These increases in density may increase in the number of moose-human conflicts, and moose may experience nutritional stress, particularly during severe winters. The number of antlerless moose harvested in recent years

and the severity of the winter of last couple of years has arrested the growth of the herd and led to a population reduction. As a result, the department will continue to offer a reduced number of antlerless permits for RY25 and future permit levels will be adjusted as more current population information becomes available.

Browse surveys completed in the spring of 2016 demonstrated a removal rate of 37.13% ($\pm 6.9\%$; 95% CI). This offtake indicated a relatively high proportion of commonly browsed plants in the unit are being consumed annually, suggesting the moose population in Unit 14A may have approached their carrying capacity. Browse surveys were conducted at the end of a winter which had little snowfall and browsing appeared to be more evenly distributed than in what would be found in a typical year.

Moose-vehicle collisions result in property damage and may result in human injury or death. An average of approximately 300 moose per year were killed in the Mat-Su Valley area during the last 5 years of average snowfall and reliable reporting. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

The department uses the targeted hunts to mitigate public safety concerns by issuing permits to selected hunters and assigning them to hunt areas that correspond with areas of high moose-vehicle collisions or reoccurring nuisance issues.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Antlerless moose harvests are necessary to achieve and maintain the population within objectives and reduce moose-human conflicts in the Mat-Su Valley by providing significant additional moose hunting opportunity.

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

PROPOSAL 65 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Reduce the maximum number of permits able to be issued by the department. Break up Unit 14A winter antlerless hunts into separate hunt areas.

PROPOSED BY: Matanuska Valley Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would reduce the total number of antlerless moose permits that may be issued in Unit 14A from 2,000 permits to 1,000 permits. It would also change the hunt area for draw hunts DM413 and DM414 from all of 14A to match the hunt areas for the fall antlerless hunts.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations for Units 14A can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

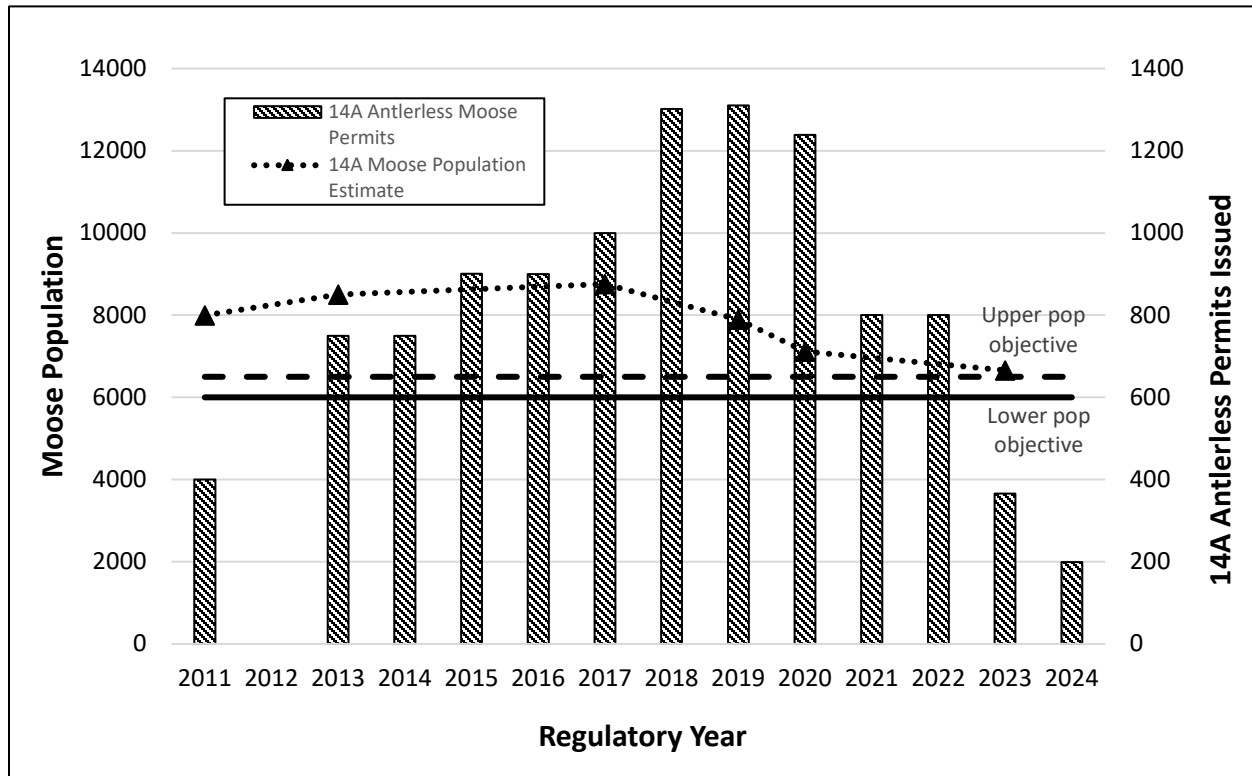
- The department has the authority to issue up to 2,000 drawing permits to resident hunters in Unit 14A with a bag limit of 1 antlerless moose. The season is August 25–September 25 for DM400–DM410 and YM412, November 1–November 30 for DM413 and December 1–December 25 for DM414.
- The department may also issue up to 200 permits to resident hunters for the targeted registration hunt (AM415) in Unit 14A with a bag limit of 1 moose during a winter season to be announced by emergency order.

Moose in Unit 14A have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,000–6,500 moose and 360–750, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would reduce the cap on the number of antlerless moose permits that could be issued in Unit 14A from 2,000 permits to 1,000 permits. It would also break up the 2 winter hunts, DM413 and DM414, into 8 different hunt areas, matching the hunt areas for the fall hunts. Reducing the maximum allowable permits may limit the department’s ability to respond to significant population increases and may result in a boom-bust population cycle. Fragmenting the winter hunts would ensure an even distribution of hunters in the winter but would also add a significant administrative burden to the department. Additionally permit allocation made a year prior to the hunt would not allow for hunters to shift effort to match seasonal movements of moose.

BACKGROUND: Moose surveys conducted in November of 2023 provided a population estimate of 6,657 (± 810 ; 80% CI) moose in Unit 14A (Figure 65-1). This is less than the 2020 population estimate of 7,112 however it is greater than the population objective of 6,000–6,500 moose. Twinning surveys conducted in the spring of 2024 showed a twinning rate of 28%, the highest since 2017. Twinning rate is an indicator of the health and productivity of a population, a population at or near carrying capacity that may be exceeding what the habitat can support will have a lower twinning rate (<20%). Populations are managed for high productivity, allowing for high sustained harvest. The twinning rate has been increasing since 2021 which suggests that the population productivity is increasing as the population is being brought closer to the objective.

Figure 65-1. Unit 14A moose population and antlerless permit numbers, RY11–RY24.



The number of antlerless permits available was raised in spring of 2011 from 400 to 1,000 (Figure 65-1). Due to the heavy snows that same winter, there were no antlerless permits issued in 2012. Subsequent surveys indicated that the moose population was not adversely affected by the winter of 2011 and was continuing to grow. The number of permits available began to be increased eventually meeting the limit of 1,000 permits for the fall of 2017. In spring of 2018 the board increased the permit limit to 2,000 permits and 1,302 permits were issued for RY18 and 1,310 in RY19. The antlerless permits were reduced to 800 in RY21 and RY22, 367 in RY23, and then reduced again to 199 in RY24 as the population was reduced and approached the upper end of the population objective. The success rate for hunters under the antlerless permits has remained steady at about 49% over the past 3 years independent of the number of permits issued. DM401 has the lowest success rate at an average of 25%, largely due to limited access, while the winter moose hunts, DM413 and DM414 have the highest average success rates at 75%.

The winter antlerless hunts, DM413 and DM414, are one of the most effective tools for reducing the moose population. Held during the months of November and December, spanning the entirety of Unit 14A, there is occasionally the public perception that all hunter effort is focused on 1 or 2 specific areas. Over the last 5 years (RY19–RY23), hunters have spread themselves across the unit primarily based on the location of their personal residency, their perception of local moose densities, or available hunter access (Table 65-1). Hunters will occasionally contact the department for recommendations on where to hunt and are typically referred to areas in the unit where there has been higher recent nuisance wildlife reports or higher moose-vehicle collisions.

Table 65-1. Harvest locations in antlerless hunts DM413 and DM414, RY19–RY23.

Location	RY19	RY20	RY21	RY22	RY23	Total	% of Total
Willow/Zero Lake/Bald Ridge	37	39	19	25	4	124	15%
Big Lake/Houston	66	73	34	36	13	222	26%
Pt. Mac/KGB	43	73	19	29	3	167	20%
Knik/Butte	21	33	27	24	7	112	13%
Sutton/Chickaloon	35	26	10	11	3	85	10%
Palmer Hay Flats	30	11	12	6	4	63	7%
Palmer/Wasilla	17	27	17	4	7	72	9%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on decreasing the maximum number of permits able to be issued. The department adaptively manages moose populations, and with the current population estimate, the department does not anticipate issuing more than 1,000 permits in the near future. However, if populations were to rise significantly above objective as occurred in 2013–2017, a higher maximum number of permits will be necessary to control growth and reduce the population.

The department is **OPPOSED** to breaking up the winter hunt areas as this would unnecessarily cause a substantial increase in administrative burden. Fragmenting the hunt areas for DM413 and DM414 would address a perception of overuse in certain areas and may result in a temporary localized depletions. However, hunters typically disperse throughout the unit with areas of higher moose density typically receiving higher hunter pressure. Moose are generally well distributed throughout the unit in the fall. During winter as snow builds up at higher elevations moose begin to move and congregate in areas of lower elevation. It would be inappropriate to distribute hunting pressure when moose distribution has shifted.

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

PROPOSAL 66 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a fall, archery only moose hunt in Units 14A and 14B.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would add a 5-day, archery-only general season moose hunt from September 26–September 30 in Units 14A and 14B with a bag limit of 1 bull moose with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least 1 side.

WHAT ARE THE CURRENT REGULATIONS? Units 14A and 14B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Resident and nonresident hunters may take 1 bull moose with spike-fork antlers, or 50-inch antlers, or antlers with 3 or more brow tines on at least one side with a bow and arrow only from August 10 to August 19 in Units 14A and 14B; or under general hunt regulations without weapons restrictions from August 25 to September 25.

There are additional drawing hunt opportunities for any-bull in Units 14A and 14B as well as antlerless moose in Unit 14A.

Moose in Units 14A and 14B have been identified as important for providing high-levels of harvest for human consumption with population and harvest objectives of 6,000–6,500 moose and 360–750 moose in 14A, and 2,500–2,800 and 100–200 moose in 14B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would add an additional five-day archery season to the end of the general season moose hunt in Units 14A and 14B. Additional days added closer to the rut will likely result in additional harvest of moose in these units due to moose being more susceptible to calling but are not expected to have an impact on populations.

BACKGROUND: Archery-only seasons were adopted in Units 14B and 16A in regulatory year (RY) 1995 and in Unit 14A in 1998. The season dates were August 10–August 17 from their inception until RY2022 when two days were added to the end of the archery hunt making it August 10–August 19. Over the last 5 years 9.2% of the harvest in Unit 14A is taken by bow and arrow, 6.1% of moose harvested in Unit 14B, and 1.3% of moose taken in Unit 16A are taken by these methods as well. Approximately 70% of moose taken by this means are during the archery-only season. The chronology of the harvest varies by unit, but harvest does consistently increase as the season progresses (Figure 66-1).

The moose population in Unit 14A has been above the objective of 6,000–6,500 moose for the last 16 years, although it has declined from its peak of an estimated 8,756 moose in 2017 to 6,657

moose in the most recent survey in 2023. Unit 14B was last surveyed in 2021 with an estimate of 2,463 moose, below the objective of 2500–2800 moose (Figure 66-2)

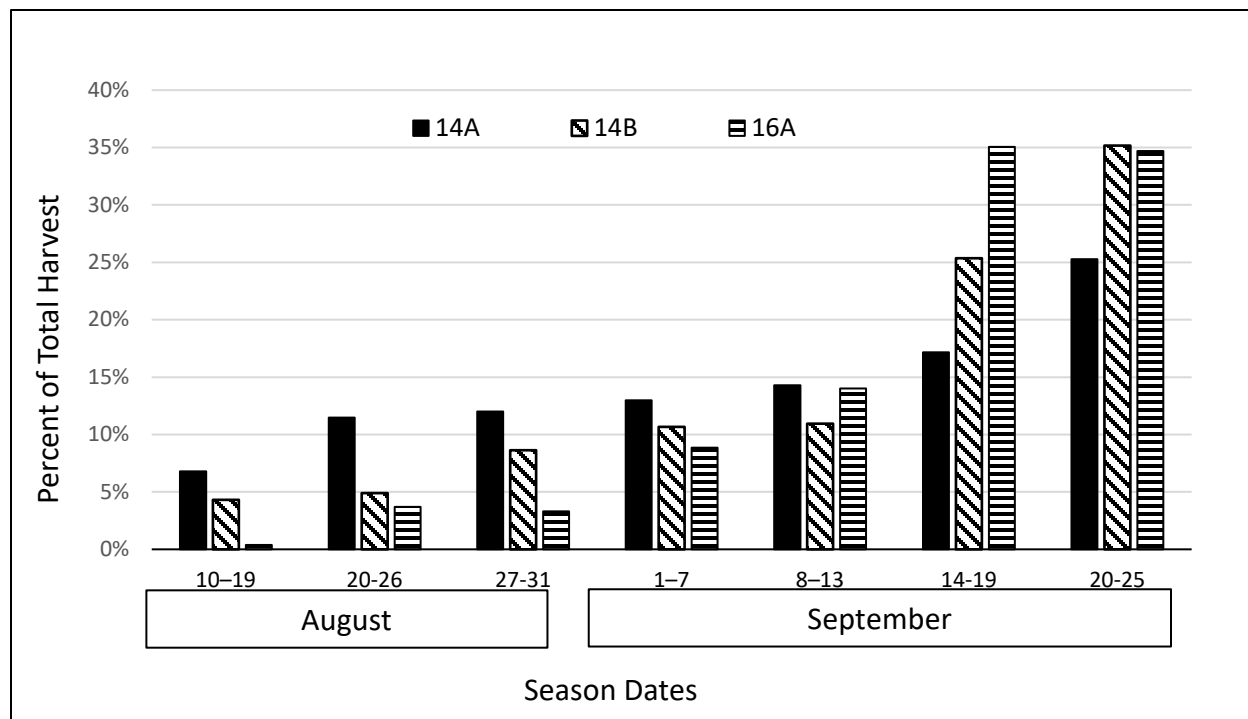


Figure 66-1. Moose harvest chronology in Units 14A, 14B, and 16A, RY19–23.

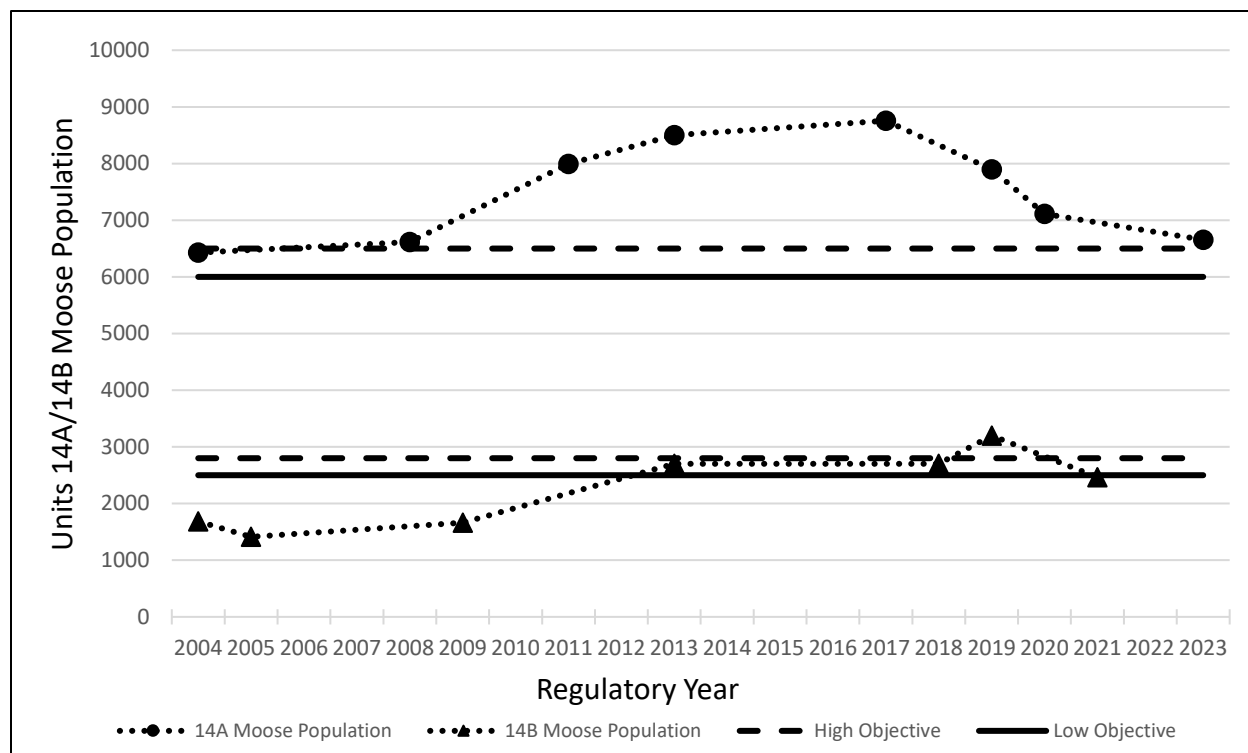


Figure 66-2. Moose population estimates for Units 14A and 14B, RY04–23.

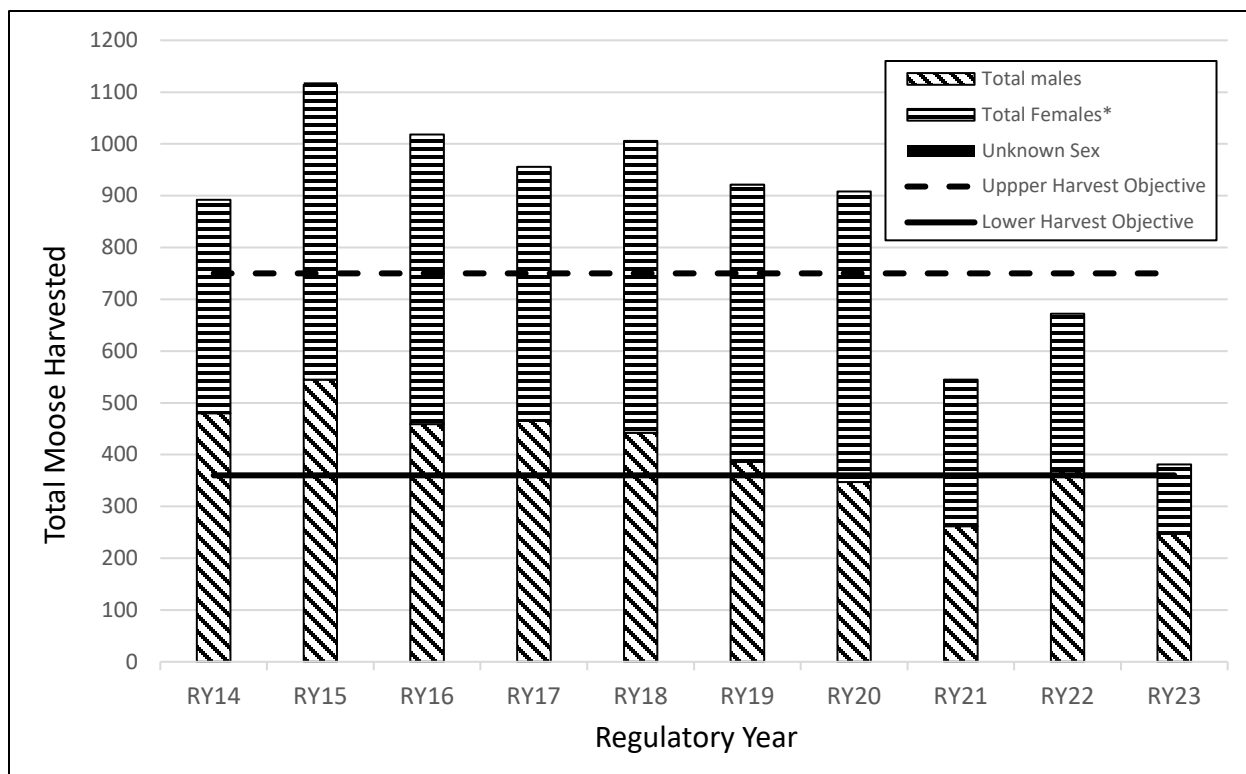


Figure 66-3. Unit 14A moose harvest by Regulatory year.

*Unit 14 holds drawing hunts for antlerless moose and in RY23 began holding an any bull moose hunt with minimal harvest.

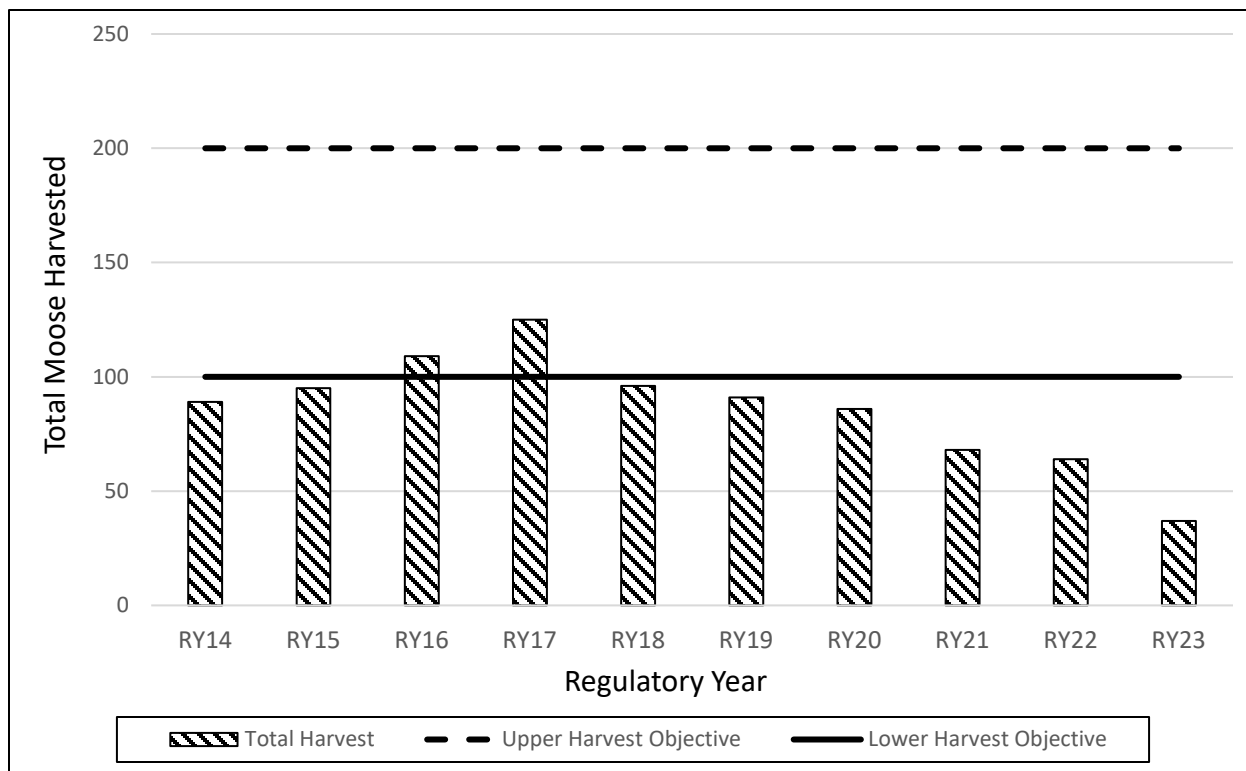


Figure 66-4. Unit 14B moose harvest by regulatory year. Unit 14B has held an any bull moose drawing hunt since 2019, but harvest levels have been relatively insignificant.

The 14B bull:100 cow ratio was 37 and the calf:100 cow ratio was 15.8. The 14A bull:100 cow ratio was 30 and the calf:100 cow ratio was 28. An archery only hunting season at the end of September will likely have significantly higher success rates than the early season archery hunt due to bull moose being more susceptible to calling. Harvest objectives in unit 14A have been met or exceeded every year for the last 10 years (Figure 66-3), although recently harvest has declined largely due to decreasing the number of antlerless moose permits issued. Unit 14B has not met the low end of the harvest objectives since 2017 with harvest declining every year since then (Figure 66-4).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to archery hunters. Adding 5 days to the general season for archery-only hunters will likely result in additional harvest. Harvest levels are not likely dictated by lack of opportunity to harvest legal bulls and providing additional opportunity at a time where the populations are near or below objective is not recommended, although it is not likely to create a population concern.

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

PROPOSAL 67 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Establish a late season archery moose hunt in Unit 16A.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would add an archery-only general season moose hunt from September 26–September 30 in Unit 16A with a bag limit of 1 bull moose with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least 1 side.

WHAT ARE THE CURRENT REGULATIONS? Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Resident and nonresident hunters may take 1 bull moose with spike-fork antlers, or 50-inch antlers, or antlers with 3 or more brow tines on at least one side with a bow and arrow only from August 10–August 19 in Unit 16A; or under general hunt regulations without weapons restrictions from August 20 to September 25.

There has previously been an additional drawing hunt opportunity for any-bull moose in Unit 16A although no permits were offered in Regulatory Year (RY) 2023.

Moose in Unit 16A have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 3,500–4,000 moose and 190–360, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would add an additional 5-day archery season to the end of the general season moose hunt in Unit 16A. Additional days added closer to the rut will likely result in additional harvest of moose in this unit due to moose being more susceptible to calling but are not expected to have an impact on populations.

BACKGROUND: Archery-only seasons were adopted in Unit 16A in RY1995. The season dates were August 10–August 17 from their inception until RY2022 when 2 days were added to the end of the archery hunt making it August 10–August 19. Over the last 5 years, 7 bulls have been taken by archery in Unit 16A making up only 1.3% of the total moose taken in this unit. Throughout Units 14A, 14B, and 16A approximately 70% of the moose taken by archery are taken during the archery-only season. The chronology of harvest varies by unit, but harvest does consistently increase as the season progresses (Figure 67-1).

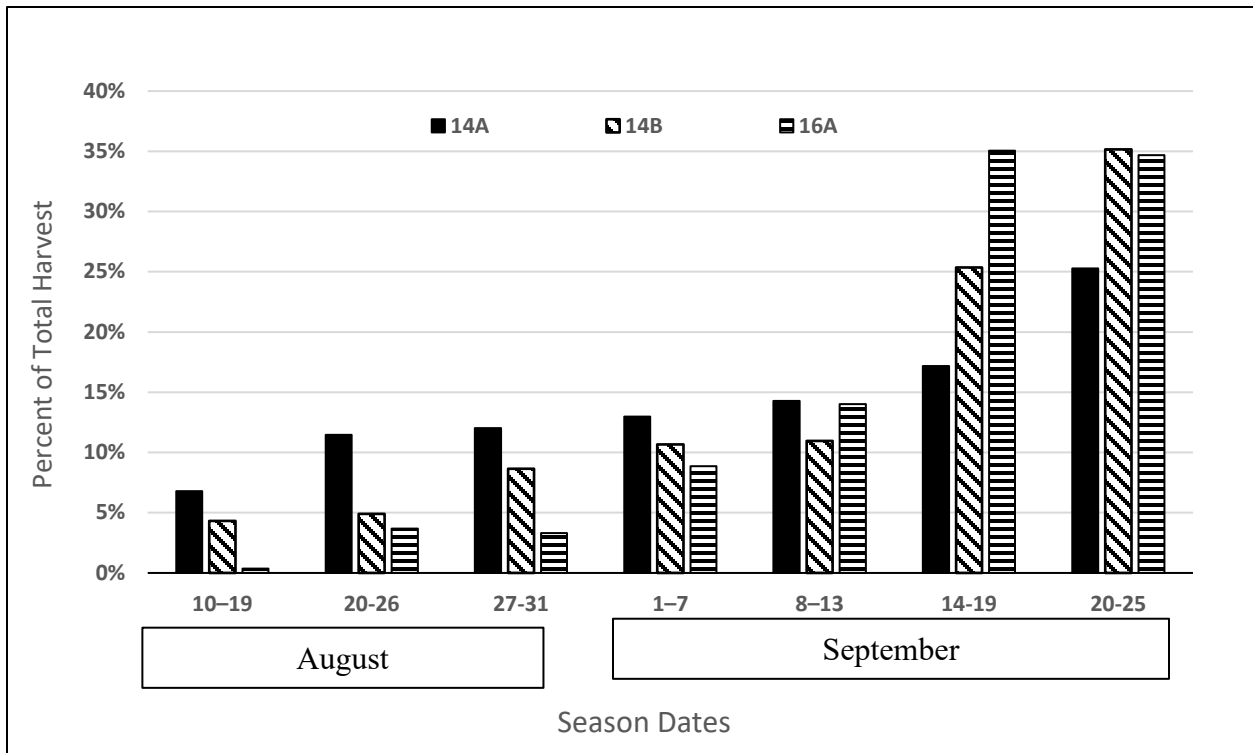


Figure 67-6. Moose harvest chronology in Units 14A, 14B, and 16A, RY2019–23.

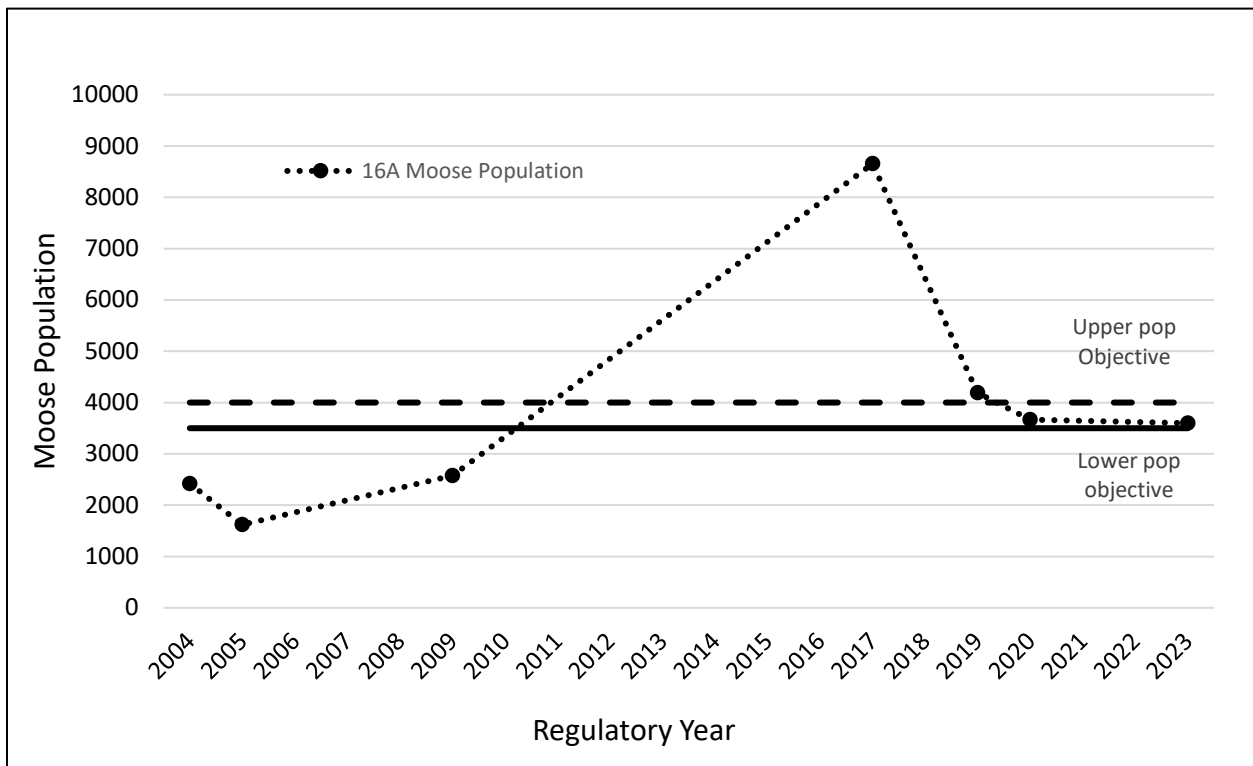


Figure 67-5. Unit 16A moose population estimates, RY04–23.

The moose population in Unit 16A was last surveyed in 2023 with a population estimate of 3,598 (± 287) moose, within the population objective of 3,500-4,000 moose and consistent with the previous survey estimate of 3,666 (± 344) moose in 2019. Unit 16A has not met the harvest objectives of 190-360 moose since RY2018 with the last 5-year average harvest being 111 moose (Figure 67-3). The unit previously held an any-bull draw hunt that was discontinued in RY24 due to the population nearing the lower end of the objective and a low bull to cow ratio of 19 bulls:100 cows. An archery-only hunting season at the end of September will likely have significantly higher success rates than the early season archery hunt due to bull moose being more susceptible to calling.

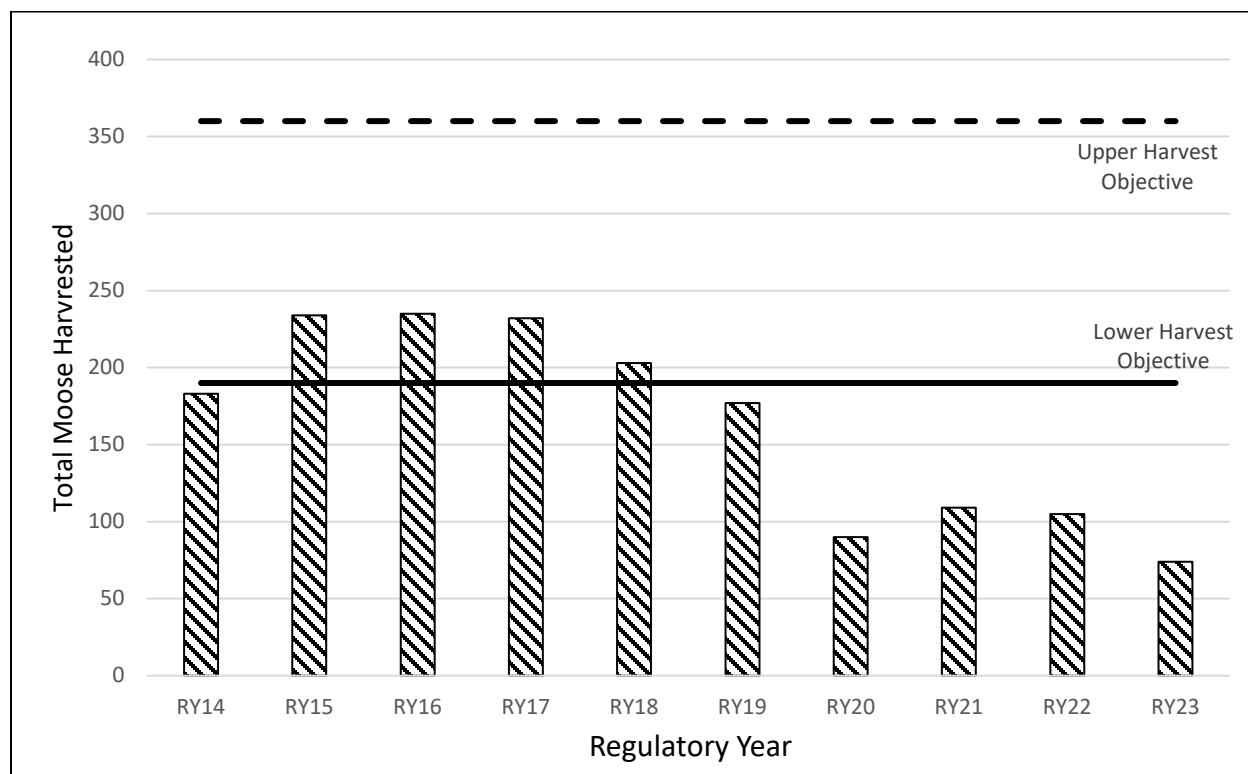


Figure 67-3. Unit 16A moose harvest and harvest objectives RY2014–RY2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to archery hunters. Adding days to the end of the general season for archery-only hunters will likely result in additional harvest but are not expected to have an impact on the population. Harvest levels are not likely dictated by lack of opportunity to harvest legal bulls in Unit 16A and providing additional opportunity at a time where the populations are near or below objective is not recommended.

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

PROPOSAL 68 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the bag limit for the Unit 16B fall Tier II hunts to 1 bull moose.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would change the fall Tier II moose hunts (TM565/567/569; Figure 68-1) from a bag limit of 1 bull moose with spike or fork antlers or 50-inch antlers or antlers with 3 or more brown tines on at least one side to a bag limit of 1 bull moose (any-bull).

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations for Unit 16B can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence & General Hunts)	Nonresident Open Season
If the harvestable portion is 199 moose or less; up to 400 total Tier II permits may be issued;		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by Tier II subsistence hunting permit only; or	Aug. 20–Sept. 30 (Subsistence hunt only)	
1 bull by Tier II subsistence hunting permit only; or if the harvestable portion is greater than 199 moose, but less than 241 moose;	Dec. 15–Mar. 31 (Subsistence hunt only)	
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or	Sept. 1–Sept. 20	
1 bull by Tier II subsistence hunting permit only; up to 260 permits may be issued; or	Dec. 15–Mar. 31 (Subsistence hunt only)	
If the harvestable portion is		

greater than 240 moose:

1 bull with spike-fork antlers
or 50-inch antlers or antlers
with 3 or more brow tines on at
least one side; or

Aug. 20–Sept.25

1 bull by drawing permit only;
up to 75 percent of the
combined drawing permits in
the area may be issued to non-
youth hunters; up to 600
permits may be issued;
provided that the harvestable
portion is greater than 310
moose; or

Aug. 20–Sept.25
(General hunt only)

1 bull by youth hunt drawing
permit only; up to 25 percent
of the combined drawing
permits in the area may be
issued to youth hunters;
provided that the harvestable
portion is greater than 310
moose; or

Aug. 20–Sept.25
Nov. 15–Jan. 31
(General hunt only)

1 bull by registration permit
only; or

Dec. 15–Last Day of Feb.

1 bull by drawing permit only;
up to 500 permits may be
issued; or

Dec. 15–Last Day of Feb.

1 moose by Tier II subsistence
hunting permit only; up to 260
permits may be issued; or

Dec. 15–Mar. 31
(Subsistence hunt only)

NONRESIDENT HUNTERS

1 bull with spike-fork antlers
or 50-inch antlers or antlers
with 3 or more brow tines on at

Aug. 20–Sept. 25

least one side; if the harvestable portion is greater than 240 moose

Moose in Unit 16B have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,500–7,500 moose and 310–600, respectively.

There are three defined moose populations in Unit 16B with separate customary and traditional (C&T) use findings and associated amounts reasonably necessary for subsistence (ANS). There is a positive customary and traditional (C&T) use finding for moose in Unit 16B in the Redoubt Bay drainages with an amount reasonably necessary for subsistence (ANS) of 10 moose. There is a positive C&T use finding for moose in Unit 16B in that portion south of the Beluga River and north of Redoubt Bay with an ANS of 29–37 moose. There is a positive C&T use finding for moose in Unit 16B in that portion north of the Beluga River with an ANS of 160–180 moose.

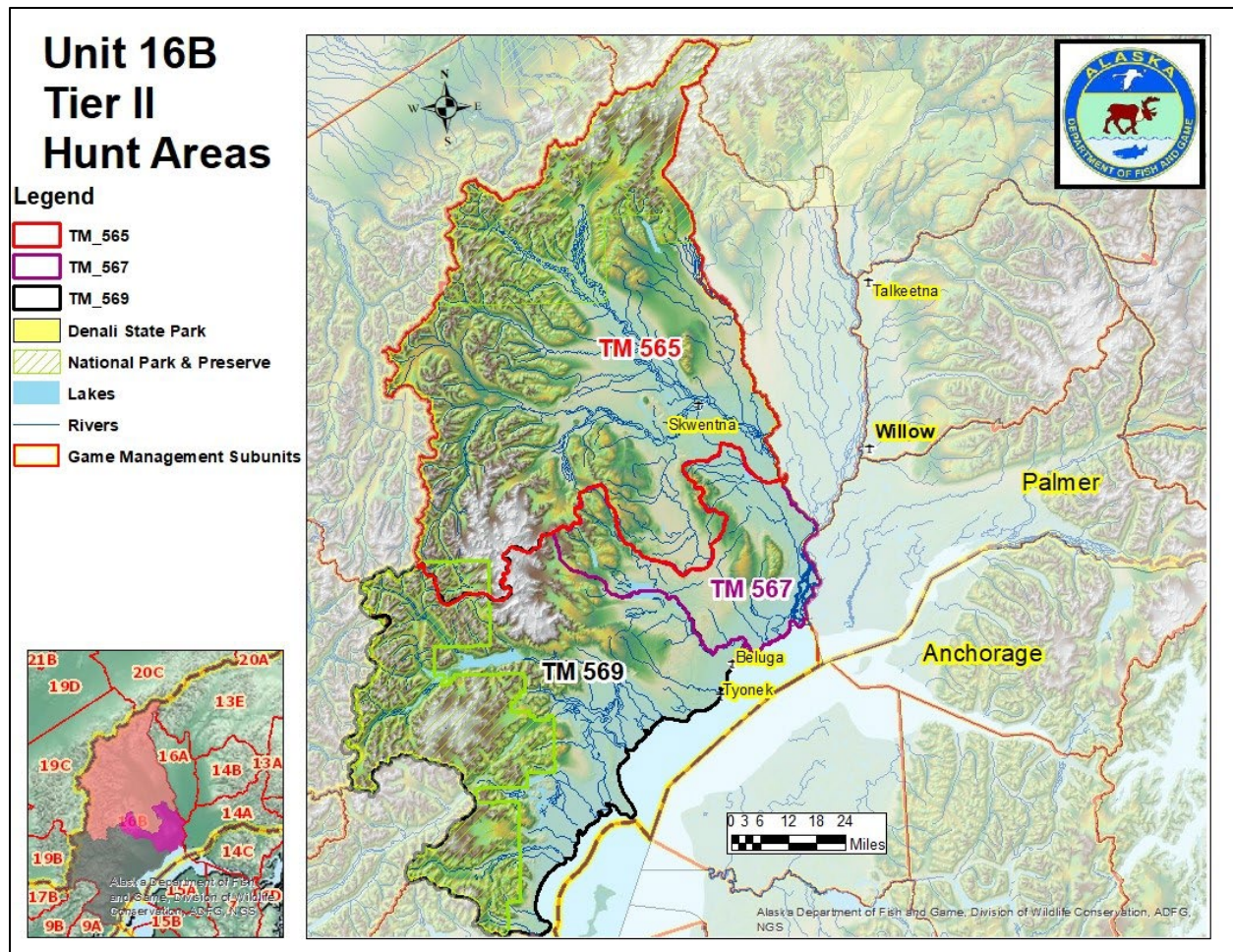


Figure 68-7. Map of the 3 Unit 16B Tier II moose hunts.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal, if adopted, would change the fall season bag limit of the Tier II moose hunts from 1 bull with spike or fork antlers, 50-inch antlers, or antlers with 3 or more brow tines on at least one side to 1 bull moose. This change would increase subsistence opportunity during the Tier II hunts where, by definition, full subsistence opportunity cannot be provided. This would likely increase catch per unit effort and increase success rates of fall Tier II hunters. If success rates increased significantly permit levels may have to be adjusted to avoid overharvest.

BACKGROUND: Moose populations in Unit 16B have been in decline since the recent high of 10,084 moose estimated in 2018. The unit experienced a heavy snow event in the winter of RY19 resulting in significant winter kill and leading to the population declining to the 2022 estimate from a geospatial population estimator (GSPE) of 6,789 moose (Figure 68-2). This estimate of 6,789 moose is near the low end of the population objective of 6,500–7,500 moose for all of Unit 16B, but when coupled with the estimates of 9.8 calves per 100 cows in Unit 16B-North, 11.7 calves per 100 cows in Unit 16B-Middle, and 6.4 calves per 100 cows in Unit 16B-South, it indicates a population that may continue to decline.

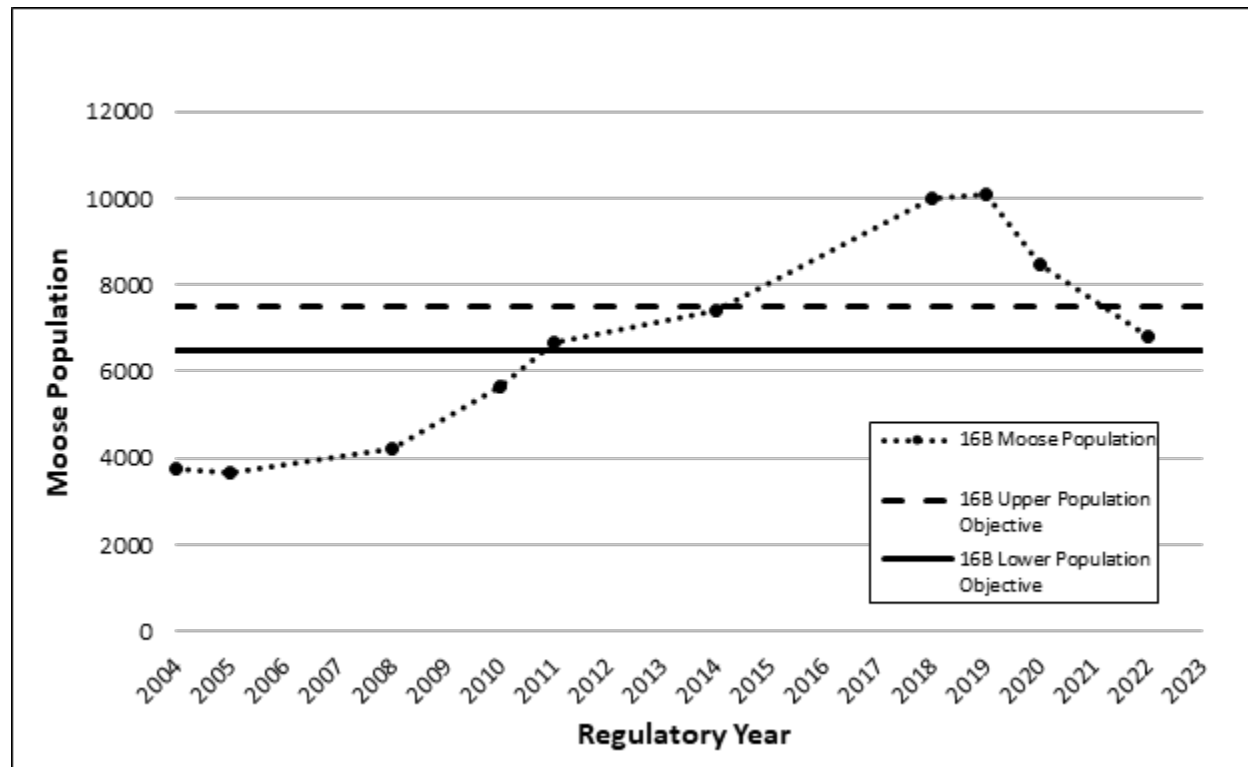


Figure 68-8. Unit 16B Moose population estimate with population objective, RY2004–2023.

Unit 16B moose are managed such that if the harvestable surplus of bulls is less than 199 moose, the season changes to Tier II only with up to 400 permits issued with a fall hunt with a bag limit of 1 bull moose with spike fork antlers, 50-inch antlers, or antlers with 3 or more brow tines on at least one side from August 20–September 30 and a winter hunt with a bag limit of 1 bull moose from December 15–March 31. Since the heavy snow year in the winter of RY19 and the subsequent die off, harvest has been declining (Figure 68-3). Harvest objectives have not been met since RY20 although general season harvest has remained relatively stable over the last 4 years, ranging from 141 moose harvested in RY20 to 119 in RY23 and an average of 127 moose. The Tier II winter season bag limit is 1 bull without antler restrictions, harvest has also remained stable over the last 5 years ranging from 105 moose to 62 moose harvested with an average of 86 and a success rate of 47%. Total harvest for 2022 was 275 moose and 2023 was 206. The harvest has exceeded the ANS of 200 moose for the last 10 years.

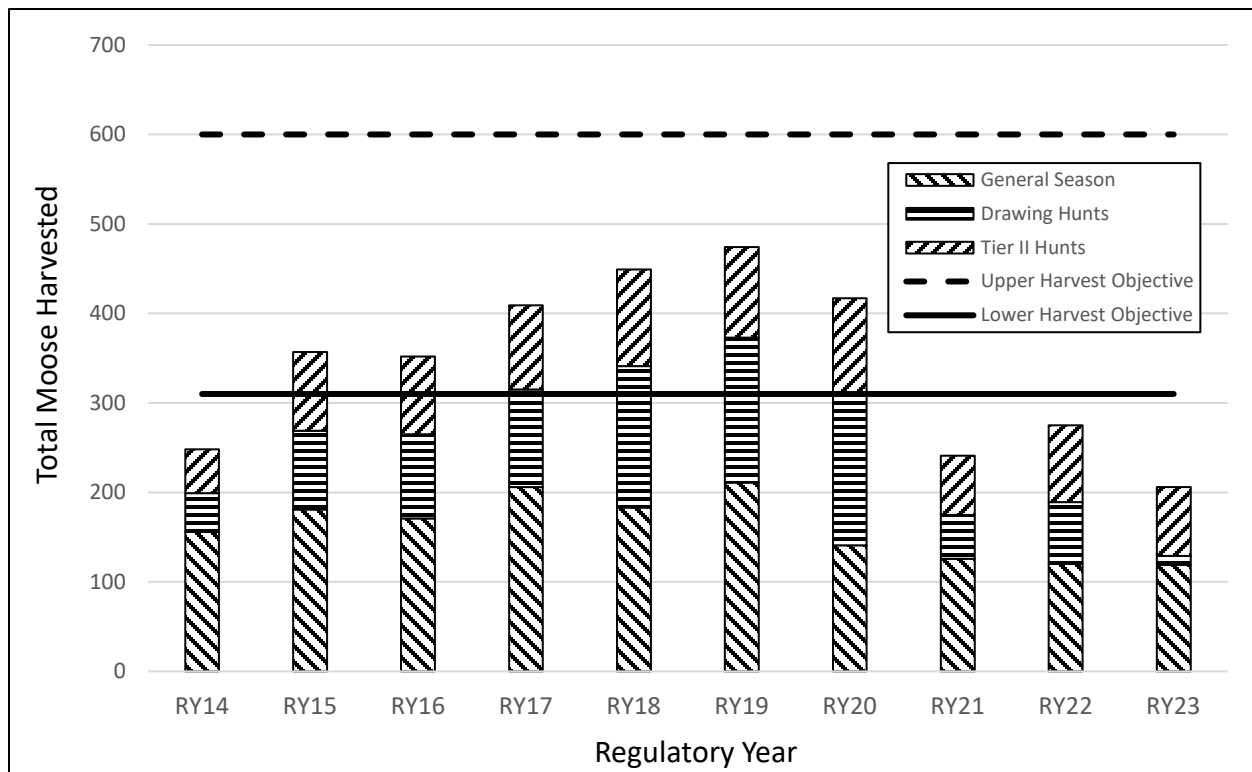


Figure 68-3. Unit 16B Moose harvest from general season, drawing, and Tier II hunts, RY2014–2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because in the event the fall Tier II seasons are held, hunting opportunity would already have been restricted by removing the general season hunt. The department would still be able to manage harvest by dictating the number of permits issued if necessary. It is likely additional moose would be harvested in the fall under an any bull bag limit versus a bag limit with antler restrictions, but overall, harvest would not likely change significantly due to already having an any bull season in the winter and there would not likely be a biological impact.

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

PROPOSAL 69 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Shorten the season for the Tier II moose hunts in Unit 16B.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would shorten the Tier II hunt seasons in Unit 16B, TM565, TM567, and TM569, from December 15–March 31 to December 15–February 28.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations for Unit 16B can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence & General Hunts)	Nonresident Open Season
If the harvestable portion is 199 moose or less; up to 400 total Tier II permits may be issued;		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by Tier II subsistence hunting permit only; or	Aug. 20–Sept. 30 (Subsistence hunt only)	
1 bull by Tier II subsistence hunting permit only; or if the harvestable portion is greater than 199 moose, but less than 241 moose;	Dec. 15–Mar. 31 (Subsistence hunt only)	
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or	Sept. 1–Sept. 20	
1 bull by Tier II subsistence hunting permit only; up to 260 permits may be issued; or	Dec. 15–Mar. 31 (Subsistence hunt only)	
If the harvestable portion is greater than 240 moose:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or	Aug. 20–Sept. 25	
1 bull by drawing permit only; up to 75 percent of the combined drawing permits in the area may be issued to non-	Aug. 20–Sept. 25 (General hunt only)	

youth hunters; up to 600 permits may be issued; provided that the harvestable portion is greater than 310 moose; or

1 bull by youth hunt drawing permit only; up to 25 percent of the combined drawing permits in the area may be issued to youth hunters; provided that the harvestable portion is greater than 310 moose; or

Aug. 20–Sept. 25
Nov. 15—Jan. 31
(General hunt only)

1 bull by registration permit only; or

Dec. 15–Last Day of Feb.

1 bull by drawing permit only; up to 500 permits may be issued; or

Dec. 15–Last Day of Feb.

1 moose by Tier II subsistence hunting permit only; up to 260 permits may be issued; or

Dec. 15–Mar. 31
(Subsistence hunt only)

NONRESIDENT HUNTERS

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; if the harvestable portion is greater than 240 moose

Aug. 20–Sept. 25

Moose in Unit 16B have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,500–7,500 moose and 310–600, respectively.

There are three defined moose populations in Unit 16B with separate customary and traditional (C&T) use findings and associated amounts reasonably necessary for subsistence (ANS). There is a positive customary and traditional (C&T) use finding for moose in Unit 16B in the Redoubt Bay drainages with an amount reasonably necessary for subsistence (ANS) of 10 moose. There is a positive C&T use finding for moose in Unit 16B in that portion south of the Beluga River and north of Redoubt Bay with an ANS of 29–37 moose. There is also a positive C&T use finding for

moose in Unit 16B in that portion north of the Beluga River with an ANS of 160–180 moose which brings the total ANS for Unit 16B to 199–227 moose (Figure 69-1).

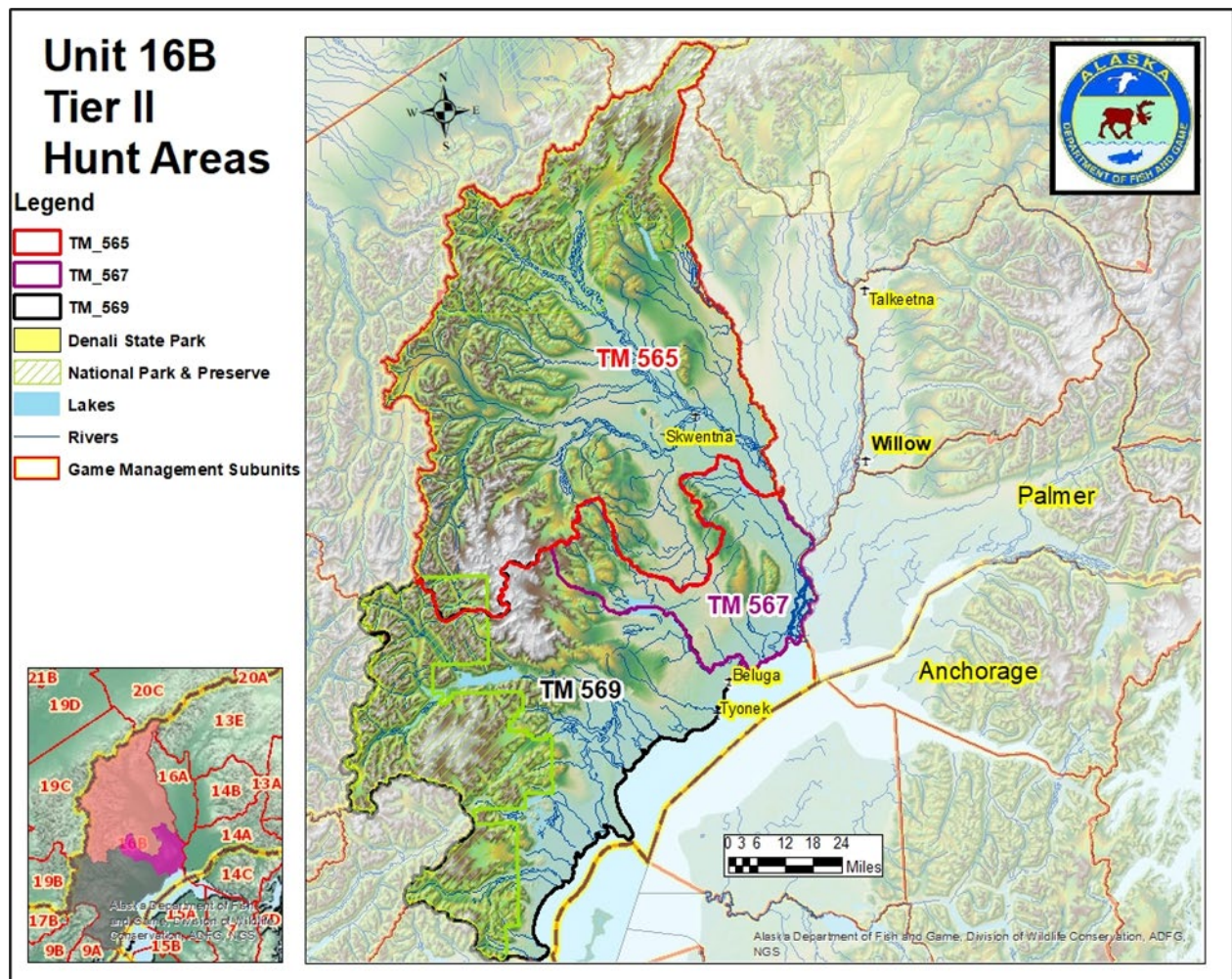


Figure 69-9. Map of Unit 16B Tier II moose hunts.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal, if adopted, would shorten the Tier II hunting seasons in Unit 16B by 31 days from December 15–March 31 to December 15–February 28. This would remove the last 31 days of the hunting season (March) when good snow conditions and long daylight lead to when the largest proportion of moose are taken within this hunt. The decrease in opportunity could lead to a decline in moose harvest.

BACKGROUND: Moose populations in Unit 16B have been in decline since the recent high of 10,084 moose estimated in 2018. The unit experienced a heavy snow event in the winter of RY19 causing a significant over winter mortality event and resulting in a population decline to 6,789 moose in 2022 (Figure 69-2). This estimate of 6,789 moose is still within the population objective of 6,500-7,500 moose for all of Unit 16B, but when coupled with the estimates of 9.8 calves per 100 cows in Unit 16B-North, 11.7 calves per 100 cows in Unit 16B-Middle, and 6.4 calves per 100 cows in Unit 16B-South, it indicates a population that may continue to decline.

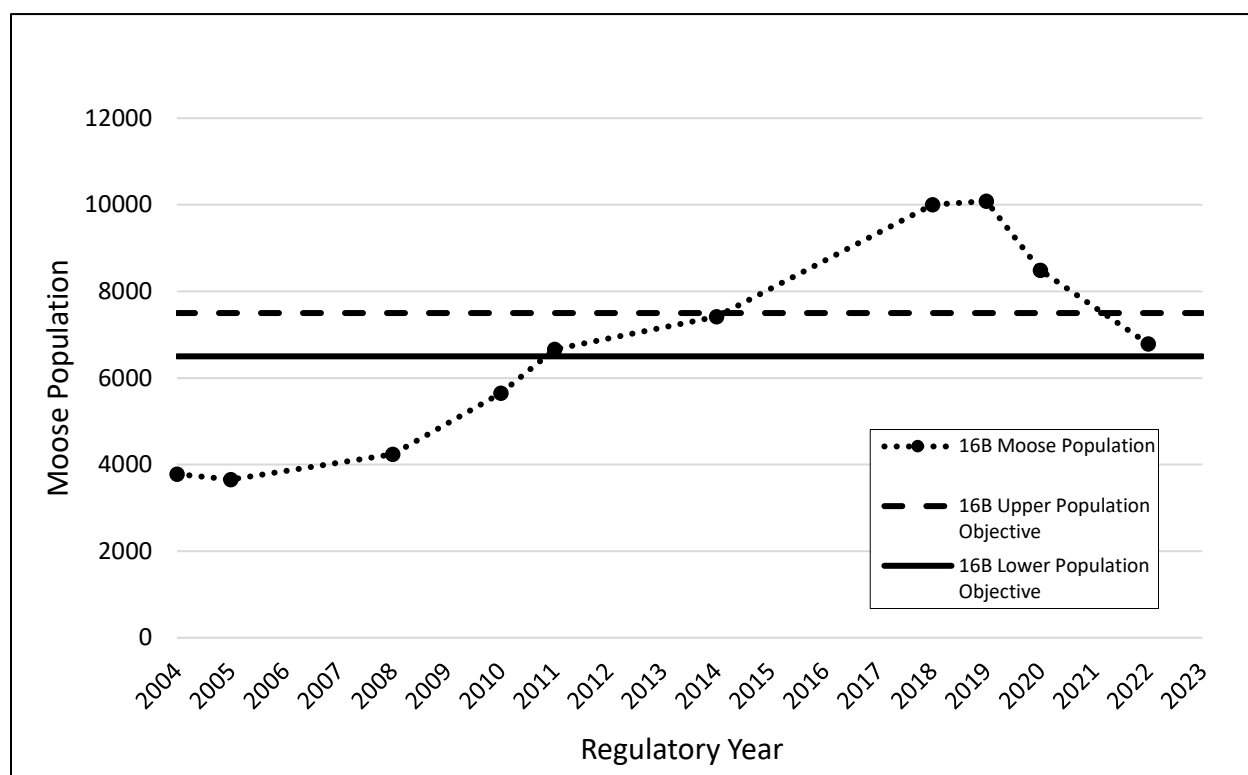


Figure 69-2. Unit 16B Moose population estimate with population objective, RY 2004–2023.

The Tier II hunting seasons for TM565, TM567, and TM569 is currently held over a 3.5-month period from December 15–March 31 (Figure 69-3). The majority of the hunting effort is conducted via snowmachine once the rivers are frozen over and there is sufficient snow cover to travel. Harvest for these hunts increases as the season progresses, 43% of the moose are taken in March versus 24% in February, 20% in January, and 13% in December (Figure 69-4). This is primarily due to increasing daylight hours, improving weather in the spring, and moose congregating on the river corridors as snow depth in the unit increases. While the largest portion of harvest occurs in March, if that month was removed, most hunters would likely shift their focus earlier in the year and there would not be a significant decrease in harvest.

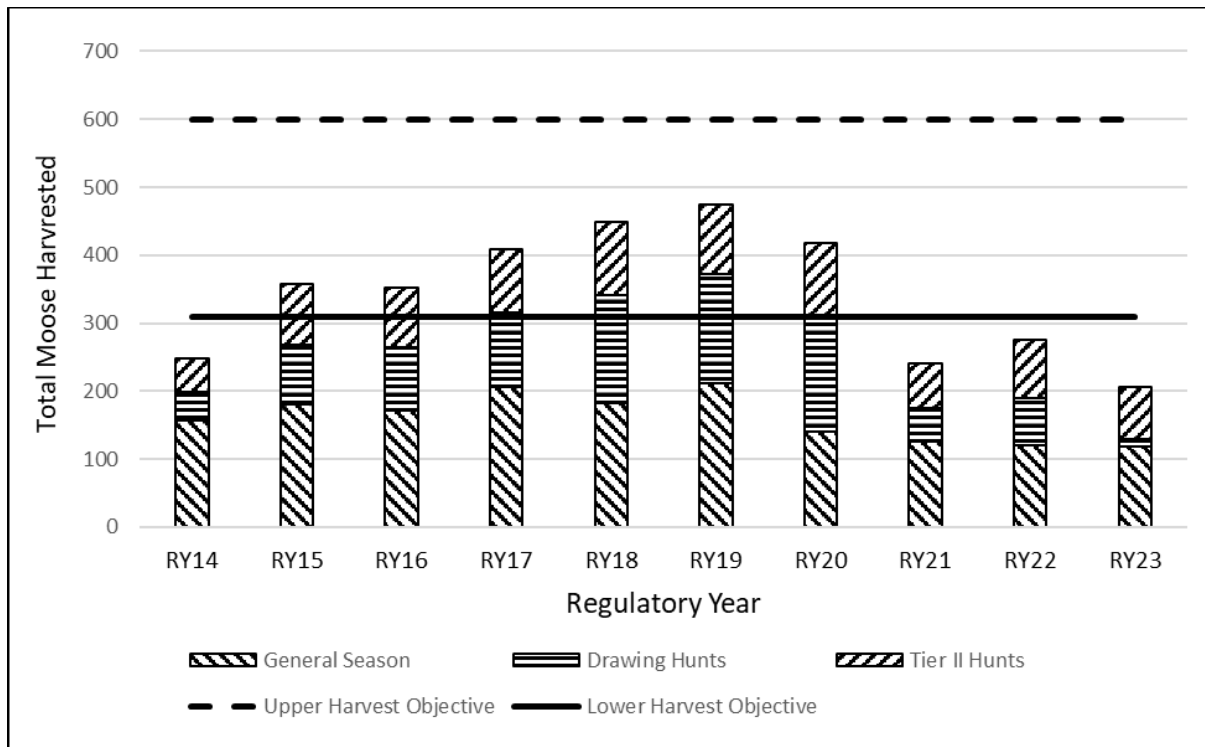


Figure 69-3. Moose harvest in Unit 16B, RY14–23.

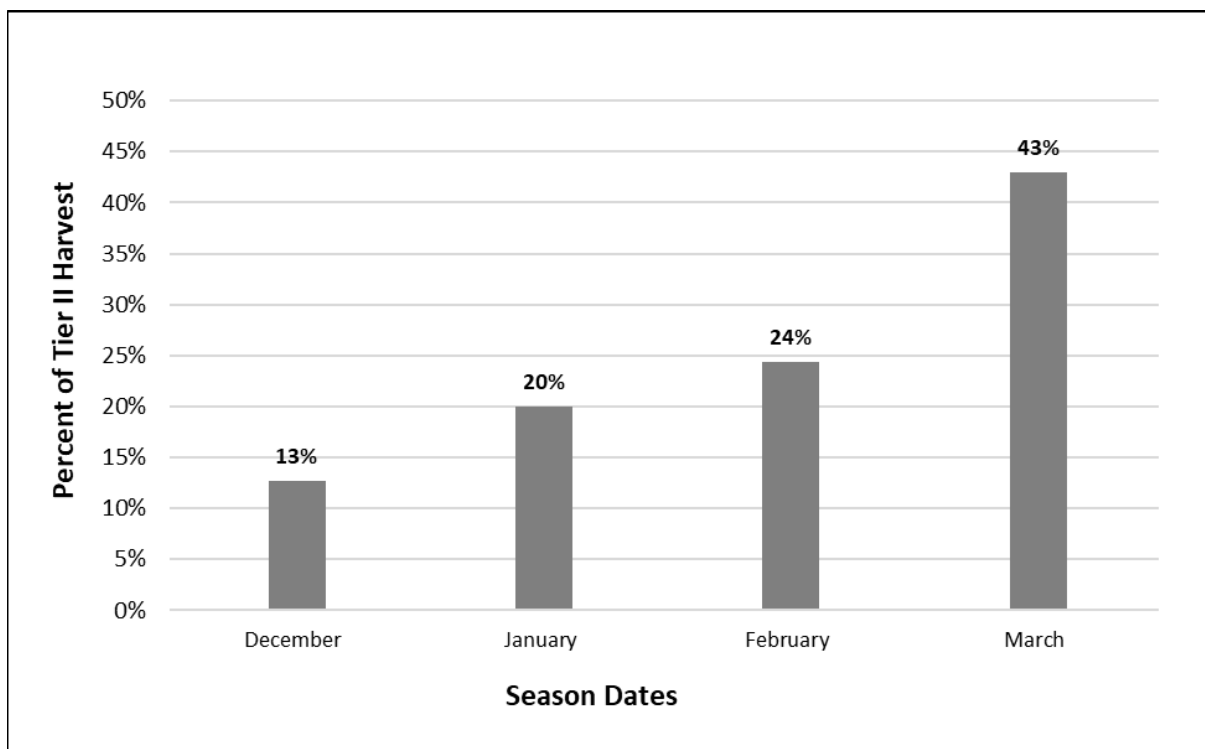


Figure 69-4. Chronology of harvest for Unit 16B Tier II moose hunts TM565, TM567, TM569, RY19–23.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because there would still remain opportunity for harvest, and it would not likely significantly decrease harvest. It would, however, remove the month where the majority of harvest occurs and constrict hunters to a shorter time frame at a time of year where environmental factors are less ideal, but moose may be in slightly better health. If the board chooses to adopt the shorter season, the department recommends the board amend the proposal to close the hunt on the last day of February. Also, if adopted, the board should consider whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting moose for subsistence uses.

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

PROPOSAL 70 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the brown bear hunting season in Units 14A and 14B.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? Extend the brown bear hunting season in Units 14A and 14B by 15 days from May 31 to June 15.

WHAT ARE THE CURRENT REGULATIONS? Units 14A and 14B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current bear hunting regulations can be found in 5 AAC 85.020 and in the *2023–2024 Alaska Hunting Regulations*.

Unit 14A regulations allow 1 brown bear every regulatory year between September 1–May 31 for residents and nonresidents and may be taken over a bear bait station. The current regulations in Unit 14B for residents and nonresidents are 1 brown bear every regulatory year August 1–May 31. Baiting season for black bears is April 15–June 30.

In Units 14A and B there is no baiting allowed within one-quarter mile of the shorelines of the Susitna River, and the Little Susitna River, south of the Parks Highway bridge. In less developed areas, more remote areas of the region (i.e., Units 11, 13, 16) where brown bear densities are likely higher, seasons extend until at least the end of June.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide hunters with an additional 15 days at the end of the current bear season extending it from May 31 to June 15. Brown bears could be harvested at bear bait stations in this area. Adoption of this proposal is expected to result in an increased harvest of brown bears. This proposal would not result in additional conflicts with bear baiters as the black bear baiting season already extends to June 30.

BACKGROUND: The brown bear management objective is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from RY13–RY22 was 20 bears and the average percent of males was 57% (Figure 70-1),.

Brown bear populations in these units are very difficult to survey because the units are heavily forested and other methods have yet to be used to develop an estimate, so the department has used other measures of abundance such as harvest, and the number of nuisance bear complaints and defense of life and property (DLP) killed bears. On average less than 1 bear per year, in both units combined, are killed through DLP since RY18. There appears to be no trend in DLPs.

Taking brown bears at black bear bait stations became legal in Unit 14B in RY15 and Unit 14A in RY18. Since RY18, an average of 90% of bears taken in the spring have been taken over bait. The harvest chronology in Units 14A and 14B has shifted from being relatively equally distributed throughout the season or skewed toward fall to being strongly skewed toward spring since RY18 (Table 70-1).

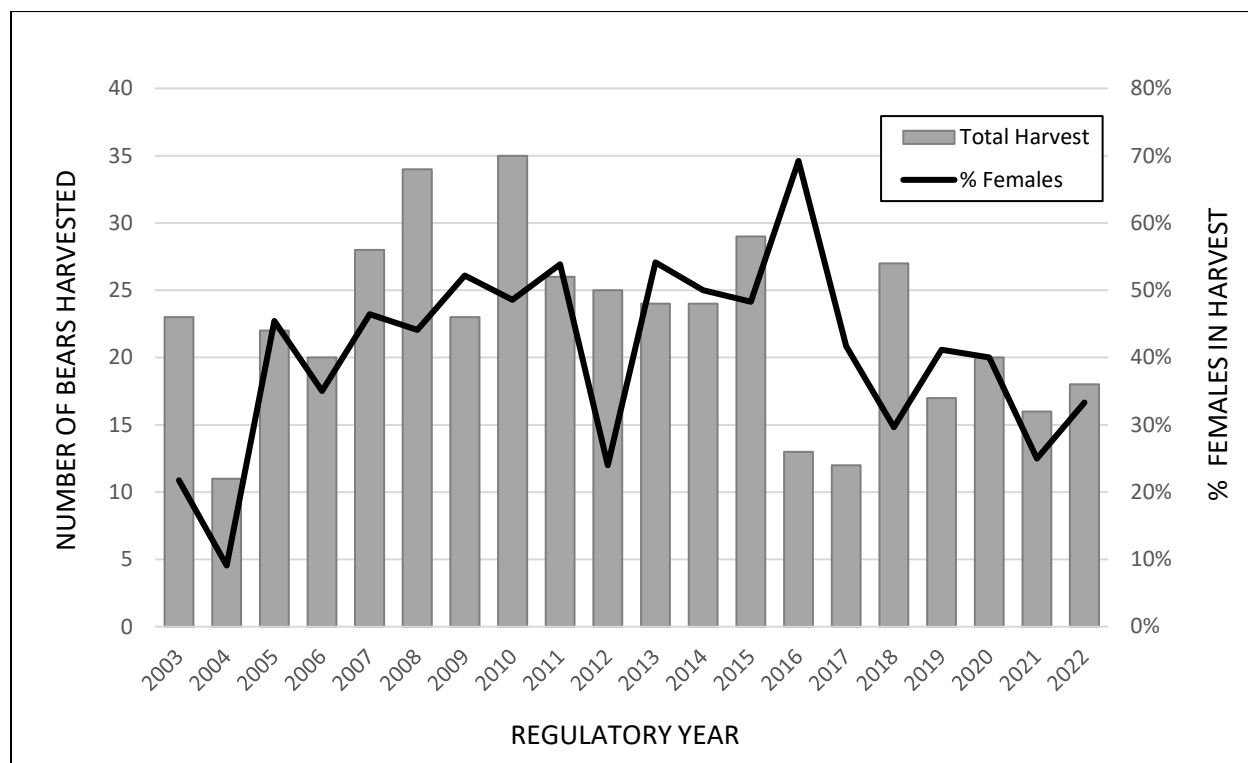


Figure 70-1. Unit 14A&B total brown bear harvest and percent female of harvest, RY2003–2022.

Table 70-1. Chronology of the harvest of brown bears in Units 14A & 14B, RY2015–19.

	July	August		September		October through	May		June	
	1–31	1–15	16–31	1–15	16–30	April	1–15	16–31	1–30	Total
Reg Year										

RY18	4%	4%	11%	15%	4%	0%	0%	59%	4%	27
RY19	0%	0%	12%	18%	12%	6%	6%	47%	0%	17
RY20	5%	0%	15%	15%	20%	15%	10%	20%	0%	20
RY21	0%	0%	0%	13%	13%	19%	6%	44%	6%	16
RY22	6%	4%	0%	11%	39%	11%	6%	22%	0%	18

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal, and recommends the board extend the season to June 30 in both Unit 14A and 14B as it has not identified a biological concern for bears, and aligning the brown bear season with the black bear season reduces regulatory complexity for hunters. This would allow for taking brown bears at bait stations throughout the baiting season.

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

PROPOSAL 71 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the brown bear hunting season in Unit 14B.

PROPOSED BY: Dominic Nickles

WHAT WOULD THE PROPOSAL DO? This proposal would extend the brown bear hunting season in Unit 14B by 30 days from May 31 to June 30.

WHAT ARE THE CURRENT REGULATIONS? Unit 14B is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Unit 14B regulations allow 1 brown bear every regulatory year August 10–May 31. Baiting season for black bears is April 15–June 30.

In Unit 14B there is no baiting allowed within one-quarter mile of the shorelines of the Susitna River, and the Little Susitna River, south of the Parks Highway bridge. In less developed areas, more remote areas of the region (i.e., Units 11 and 13) where brown bear densities are likely higher, seasons extend until the end of June and allow the taking of brown bears at bait stations.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide hunters with an additional 30 days added to the end of the current bear season extending it from May 31 to June 30. Brown bears can be harvested at black bear bait stations in this area. The adoption of this proposal is expected to result in an increased harvest of brown bears.

This proposal would not result in additional conflicts with bear baiters as the black bear baiting season already extends to June 30.

BACKGROUND: The brown bear management objective for Units 14A and 14B combined is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from RY13–RY22 for unit 14B was 12 bears and the average percent of males was 60% (Figure 71-1),.

Brown bear populations in this unit are very difficult to survey because the unit is heavily forested and other methods have yet to be used to develop an estimate, so the department has used other measures of abundance such as harvest, and the number of nuisance bear complaints and defense of life and property (DLP) killed bears. On average less than 1 bear in the unit is killed by DLP.

Taking brown bears at black bear bait stations became legal in Unit 14B in RY15. Since that time, an average of 86% of bears taken in the spring in Unit 14B have been taken over bait. The harvest chronology in Units 14B has shifted from being relatively concentrated in the fall season to being skewed toward the second half of May since RY18 (Table 71-1).

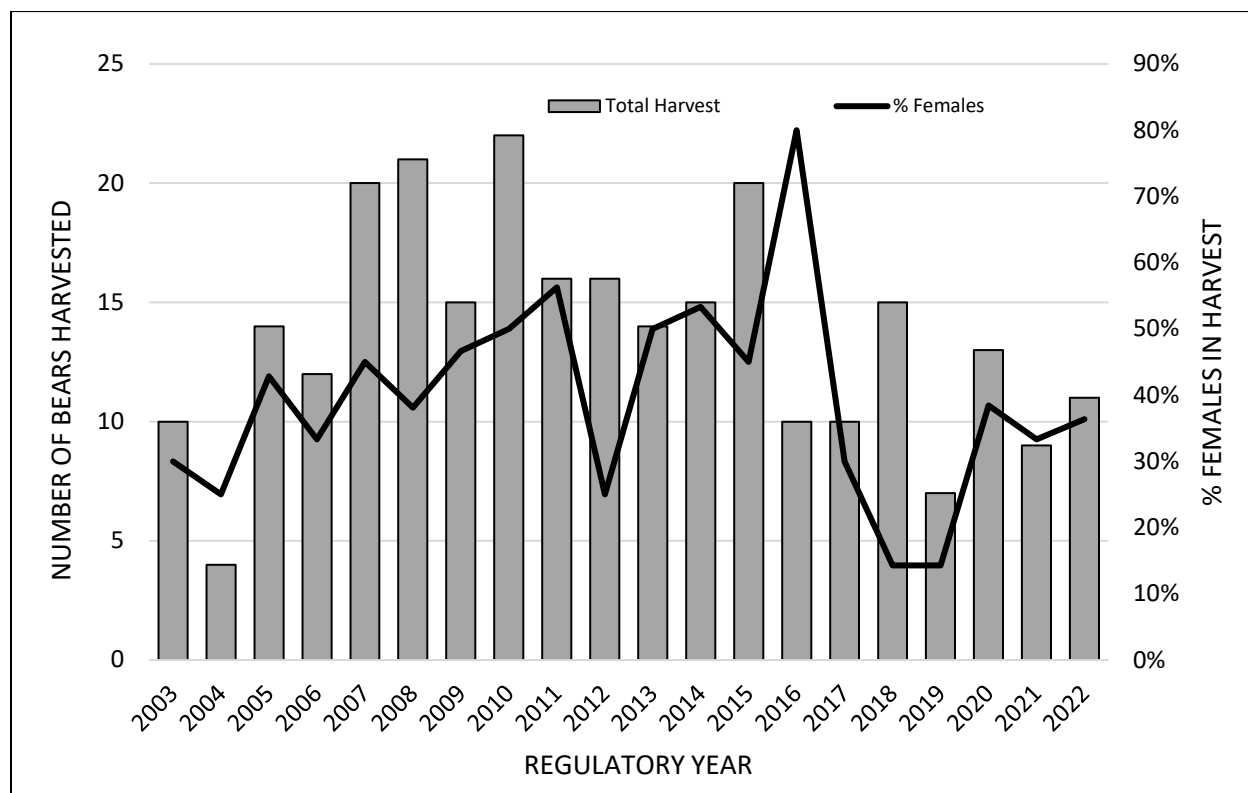


Figure 71-1. Unit 14B total brown bear harvest and percent female in harvest, RY2003–2022.

Table 71-1. Chronology of the harvest of brown bears in Unit 14B, RY2018–22.

	July		August		September		October	May		June	
Reg. Year	1–31	1–15	16–31	1–15	16–30	–April		1–15	16–31	1–30	Total

RY18	7%	7%	20%	13%	7%	0%	0%	47%	0%	15
RY19	0%	0%	14%	29%	29%	14%	0%	14%	0%	7
RY20	8%	0%	23%	0%	31%	15%	15%	8%	0%	13
RY21	0%	0%	0%	11%	11%	33%	0%	33%	11%	9
RY22	9%	9%	0%	18%	27%	9%	9%	18%	0%	11

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it has not identified a biological concern for bears in Unit 14B. Adoption of this proposal is expected to increase harvest of brown bears, and aligning the brown bear seasons with the black bear season reduces regulatory complexity for hunters.

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

PROPOSAL 72 - 5 AAC 90.010 Harvest tickets and reports. Eliminate the harvest ticket requirement for black bear in Unit 16.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove the requirement for bear hunters to get and carry harvest tickets while hunting black bears in Unit 16.

WHAT ARE THE CURRENT REGULATIONS? There is a positive customary and traditional use (C&T) finding for black bears in Unit 16B, and an amount reasonably necessary for subsistence (ANS) of 15 – 40 bears. Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

5 AAC 92.010 Harvest tickets and reports. ...(l) For black bear, a person may not hunt black bear in Units 1–7, 11–16, 19(D), and 20, except when a permit is required, unless the person has in possession a harvest ticket for the species and has obtained a harvest report.

5 AAC 85.015 Hunting seasons and bag limits for black bear.

Unit 16(B), that portion within 1 mile radius of the mouth of Wolverine creek...

Resident and Nonresident hunters

	5 bears	Sept. 15–May 31
Remainder of Unit 16.	5 bears	No closed season

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. (b) (1) A person may establish a black bear bait station, or a black and brown bear bait station in Unit... 16...

Season dates for bear baiting in Unit 16: July 1–October 15, April 15–June 30.

....

5 AAC 92.165. Sealing of bear skins and skulls. (a) Sealing is required for ... hides and skulls of black bear of any color variation taken from January 1 through May 31, and skulls of black bear of any color variation taken from June 1 through December 31 in Units 1–7, 14(A), 14(C), 15–17, and 20(B)....

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Black bear hunters in Unit 16 would no longer need to obtain or carry on their person harvest tickets for hunting black bears. Additionally, there would be no harvest report for hunters to fill out and return to the department. Bear harvest would be tracked through sealing of harvested bears which is a requirement in Unit 16. Hunter effort information (days hunted/bear harvested) is collected at the time of sealing for successful hunts. Effort information for unsuccessful hunts is collected only through the harvest report that is part of the harvest ticket system and there would be no way to gauge effort by unsuccessful hunters.

BACKGROUND: Harvest tickets are currently required in units 1–7, 11–16, 19D, and 20 except when a permit is required. Harvest tickets are free and available at Fish and Game offices, local vendors, and online. Harvest tickets provide the department with information on effort for unsuccessful hunts. This information is difficult to interpret in some areas such as Unit 16.

An average of 718 hunters reported hunting black bear in Unit 16 annually from regulatory year 2013–2023 (Figure 72-1), many of these were moose hunters who also obtained a black bear harvest ticket but were not targeting black bears. Hunters, harvest, and success rates have been increasing since 2019, with total reported harvest increasing from 133 in 2019 to 343 in 2023. The bag limit for black bears in Unit 16B is 5 bears. The average number of hunters who harvest all 5 bears in the unit is less than 1 hunter per year. There is always some discrepancy between what is sealed and what is reported as harvested, indicating not all of the public understands or follows the

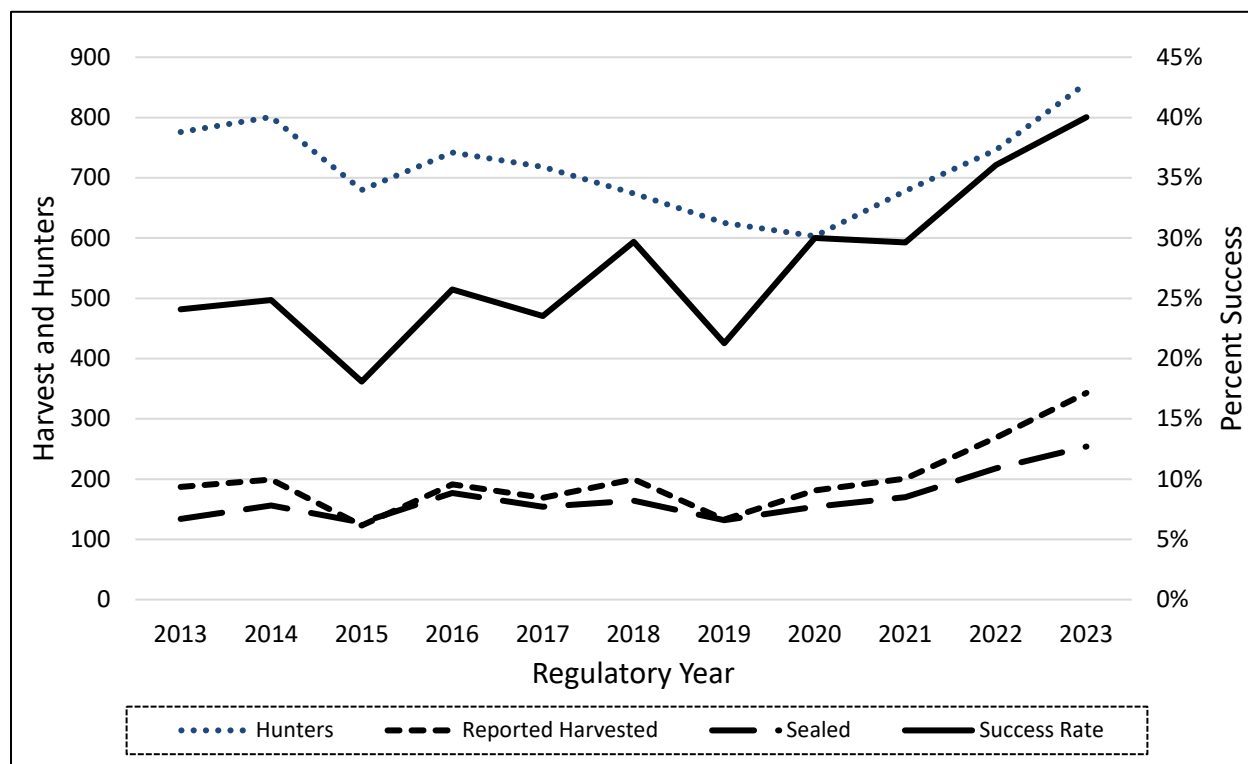


Figure 72-1. Black Bear hunters, harvest, and black bears sealed, regulatory years 2013–2023.

current requirements.

Consistency between hunt areas and between years is a factor to consider for this proposal. Every year the department has hunters who come in to seal a bear but do not have the appropriate tags or harvest tickets. Usually this is due to not carefully reading the regulations and not being aware of different requirements in units that are adjacent.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Consistency of regulations through time and across commonly traveled boundaries is beneficial to hunters by reducing confusion and prevents common violations. In addition, effort and location data for unsuccessful hunters can be a useful metric in determining management strategies.

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

PROPOSAL 73 – 5 AAC 85.055 85. 055 Hunting seasons and bag limits for Dall sheep.
Change the bag limit for Dall sheep in Unit 14A Chugach to any-ram.

PROPOSED BY: Tony Kavalok

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit for Dall sheep in Unit 14A-South and east of the Matanuska River from 1 ram with full-curl horns or larger, both horns broken, or at least eight-years-old back to 1 ram. Nonresidents would still only be able to harvest one ram every four regulatory years.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current Dall sheep hunting regulations for Unit 14A can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*.

Resident

Units and Bag Limits	Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 14(A), south and east of the Matanuska River; up to 100 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horns or larger, both horns broken, or at least eight-years-old, by drawing permit only	Aug. 10 – Sept.20	
NONRESIDENT HUNTERS: 1 ram with full-curl horns or larger, both horns broken, or at least eight-years-old, every 4 regulatory years, by drawing permit only		Aug. 10 – Sept. 20

Under the current hunt structure, the season is divided, August 10–August 25 or August 26–September 20, and 3 areas as shown on the map below (Figure 73-1). Ten percent of permits are allocated to nonresidents. Hunters cannot win the same permit two years in a row, regardless of if they hunted or harvested a ram.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would change the bag limit in the Chugach Mountains portion of Unit 14A from a ram with horns that is full-curl or larger, both horns broken, or eight-years old back to any-ram with no horn restriction. If adopted, hunter success will improve. Overharvest can be controlled by limiting the number of permits available.

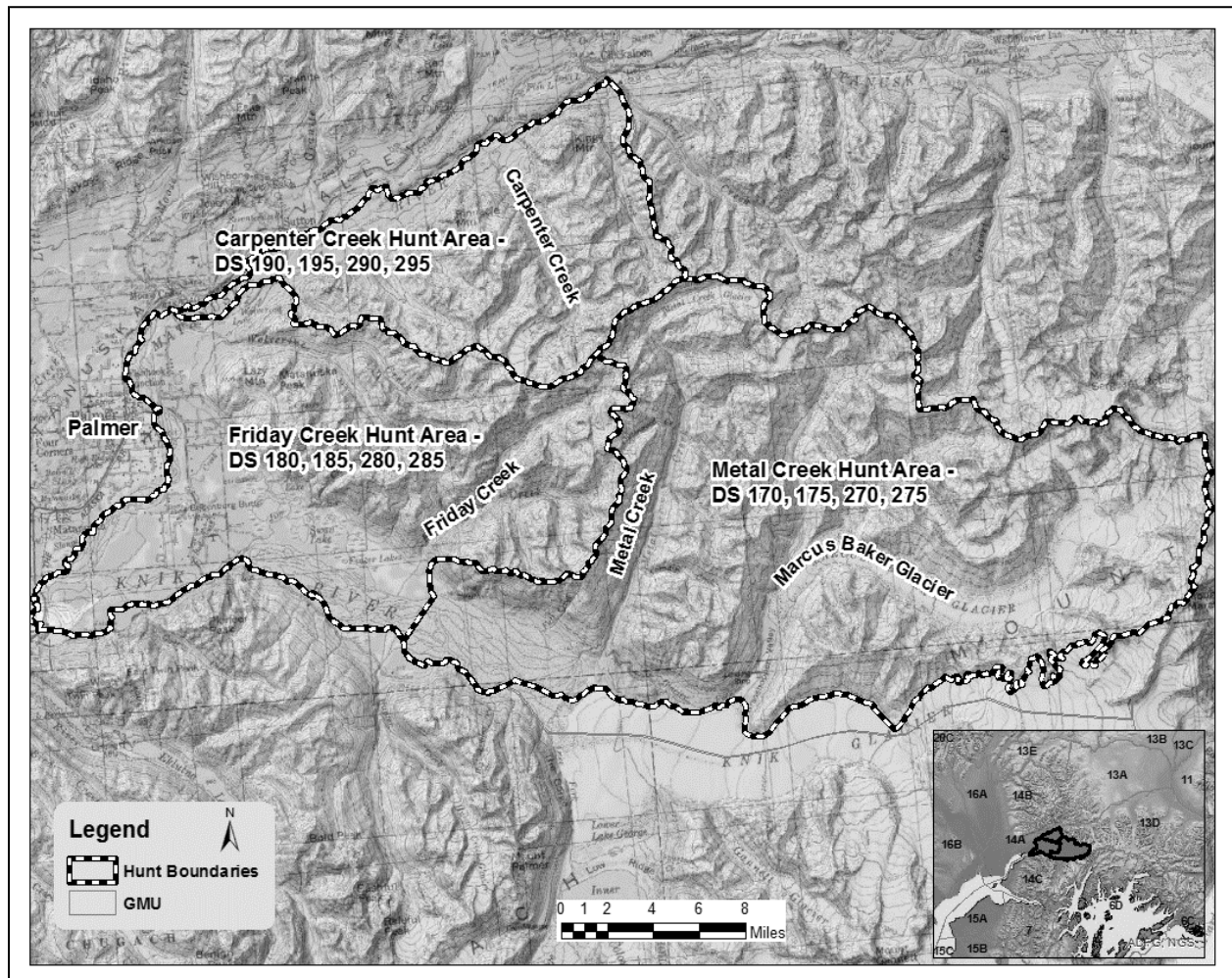


Figure 73-1. Location of the 3 current Chugach Mountain sheep draw hunt areas in Unit 14A.

BACKGROUND: The Board of Game adopted regulatory changes to the hunt structure in 2007 following a decline in sheep numbers and continued high hunting pressure. The regulatory changes included the establishment of a drawing hunt structure in the Chugach Mountain areas, liberalization of bag limits in Unit 14A and western 13D to include any-ram hunts, and the allocation of harvest opportunity between residents and nonresidents. The current hunt structure

was also designed to improve hunt quality by reducing hunter crowding through a drawing permit hunt structure, which reduced the number of hunters in the field by 62% in Unit 14A.

After the any ram drawing hunts were implemented in Unit 14A, sheep harvest decreased from an average of 24 rams (2000–2007) to 16 rams (2008–2022) (Table 73-1). The current level of harvest is sustainable and has not had been a driving factor for the population decline. The population declines that have been observed in recent years are largely due to poor weather conditions. Under the any ram hunt structure the pressure on the full curl segment of the population was significantly reduced while still allowing for several trophy rams to be available to hunters dedicated to finding large rams (Table 73-2). The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system.

In RY2023, the board changed the bag limit to one ram with full-curl horns or larger, both horns broken, or at least eight-years-old.

Table 73-1. Unit 14A Dall sheep ram composition survey results and associated harvest, RY98–RY23.

	Total Permits	Total Hunters	Total Harvested	% Success	Average of Length Longest Horn	Max Length of Longest Horn	Average of Age
Pre-Draw							
2002	-	104	20	19	34.5	38.5	8.4
2003	-	103	22	21	35.9	40.5	8.9
2004	-	113	32	28	36.1	42.1	8.5
2005	-	104	29	28	36.5	41.4	8.4
2006	-	125	24	19	36.1	40.5	8.5
2007	-	104	22	21	35.4	40.9	8.6
Post-Draw (Any-Ram)							
2008	40	28	9	32	32.8	38.3	6.7
2009	40	26	11	42	27.6	36.9	5.5
2010	40	21	6	29	29.4	36.0	6.7
2011	50	40	14	35	35.0	38.0	7.4
2012	50	40	13	33	32.7	38.6	7.2
2013	75	41	18	44	30.6	40.8	6.9
2014	74	53	18	34	33.2	41.3	7.1
2015	75	53	22	42	32.5	39.3	7.3
2016	75	53	15	28	32.5	40.8	7.5
2017	75	55	25	45	30.8	38.8	6.5
2018	64	49	20	41	30.8	40.3	5.8
2019	64	50	24	48	30.1	38.1	5.1

2020	52	40	14	35	32.1	37.9	5.6
2021	53	40	11	28	30.1	37.0	6.1
2022	48	35	15	43	32.1	39.6	6.7
Post-Draw (Full-Curl)							
2023	14	10	3	30	34.6	37.1	10.0

Table 73-2. Unit 14A draw Dall sheep harvest, hunter success, horn length, and associated age pre- and post-draw RY02–RY23.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested ^a	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
1998	218	28	38	135.71%	190	0	0%
2002	276	19	32	168.42%	257	0	0%
2006	167	26	35	134.62%	141	0	0%
2007	145	18	34	188.89%	127	0	0%
Post Draw (Any-Ram)							
2009	134	8	0	0.00%	126	11	9%
2010	167	14	3	21.43%	153	3	2%
2012	177	16	5	31.25%	161	8	5%
2013	168	11	7	63.64%	157	11	7%
2014	172	13	9	69.23%	155	9	6%
2017	254	14	7	50.00%	240	18	8%
2019	207	10	4	40.00%	197	20	10%
2020	197	14	1	7.14%	183	13	7%
2022	120	9	6	66.67%	111	9	8%
Post Draw (Full-Curl)							
2023	142	13	2	15.38%	127	1	1%

^a Percent full curl harvested is in relation to the number of full-curl rams observed during the most recent surveys. Percentages greater than 100% indicate that more rams were harvested than were observed during that year's survey.

Hunter success increased from 22% to 37% after the drawing permit hunt was implemented. The horn length of sheep harvested decreased from an average of 36 inches to 32 inches during the same periods moving from full-curl to any-ram. While the department anticipated a decrease in the overall horn length because of the change in the management strategy, Taz-West in Unit 13D did not experience a decrease in horn length. Part of the reason for the decrease appears to be in

the method of access in the area. In the Unit 14A portion of the Chugach there are a few places where hunters on foot or ATV can access the area. Among those hunters who reported taking a <3/4 curl ram since the area went to an any ram bag limit in 2007, 47% accessed the area by ATV, horse, or on foot, and 53% used airplanes. Among hunters who took sheep ≥7/8 curl to over full curl, 70% used airplanes and only 30% accessed the area by other methods. After these draw hunts were changed back to full curl beginning in the 2023 season, the average horn length increased to 35 inches while the total harvested declined to 3 rams and the success rate declined to 30%.

The any-ram opportunity provided by these drawing hunts was extremely popular because it removed the legal requirement of judging full-curl before harvesting a sheep, allowing less experienced hunters the opportunity to attempt a sheep hunt. This is demonstrated by the 9,075 applications received for these hunts in 2022, the last year it was any ram. The only sheep drawing more popular was the Delta Controlled Use Area which received 9,990 applications for 2022. The applications for these 14A hunts decreased to 4,165 in 2023 after it went to full curl.

The current hunt structure was designed to improve hunt quality by reducing hunter crowding through a drawing permit hunt structure, which reduced the number of hunters in the field by 62% in Unit 14A after moving to draw and reduced it further after restricting it to full curl in 2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because either current or proposed management strategy can be used to sustainably manage sheep in the unit. Neither full-curl or any ram management strategies resulted in a substantial change in the number of sheep, or the number of rams observed during surveys in this area. The current decline is largely due to weather events and has been observed in both full-curl and any-ram management areas as well as non-hunted areas. Providing sheep hunting opportunity to hunters who are not well practiced in judging full curl is desired by many Alaskan hunters.

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

PROPOSAL 74 - 5 AAC 85. 055 Hunting seasons and bag limits for Dall sheep. Establish a resident, archery only, sheep drawing hunt in the Chugach Mountain portion of Unit 14A.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would create an archery only drawing hunt for residents for Dall Sheep in the Unit 14A Chugach Mountains, utilizing the combined hunt areas for DS170, DS180, and DS190 from October 1–October 15 with a bag limit of 1 Dall sheep with full-curl horns or larger.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current Dall sheep hunting regulations for Unit 14A can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*.

Resident

Units and Bag Limits	Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
Unit 14(A), south and east of the Matanuska River; up to 100 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horns or larger, both horns broken, or at least eight-years-old, by drawing permit only	Aug. 10 – Sept.20	
NONRESIDENT HUNTERS: 1 ram with full-curl horns or larger, both horns broken, or at least eight-years-old, every 4 regulatory years, by drawing permit only		Aug. 10 – Sept. 20
....		

Under the current hunt structure, the season is divided into 2 seasons and 3 areas as shown on the map below (Figure 74-1). The drawing hunts DS170, DS180, DS190, DS270, DS280, DS290 are all August 10–August 25 and DS175, DS185, DS195, DS275, DS285, and DS295 are all August 26–September 20. Ten percent of permits are allocated to nonresidents.

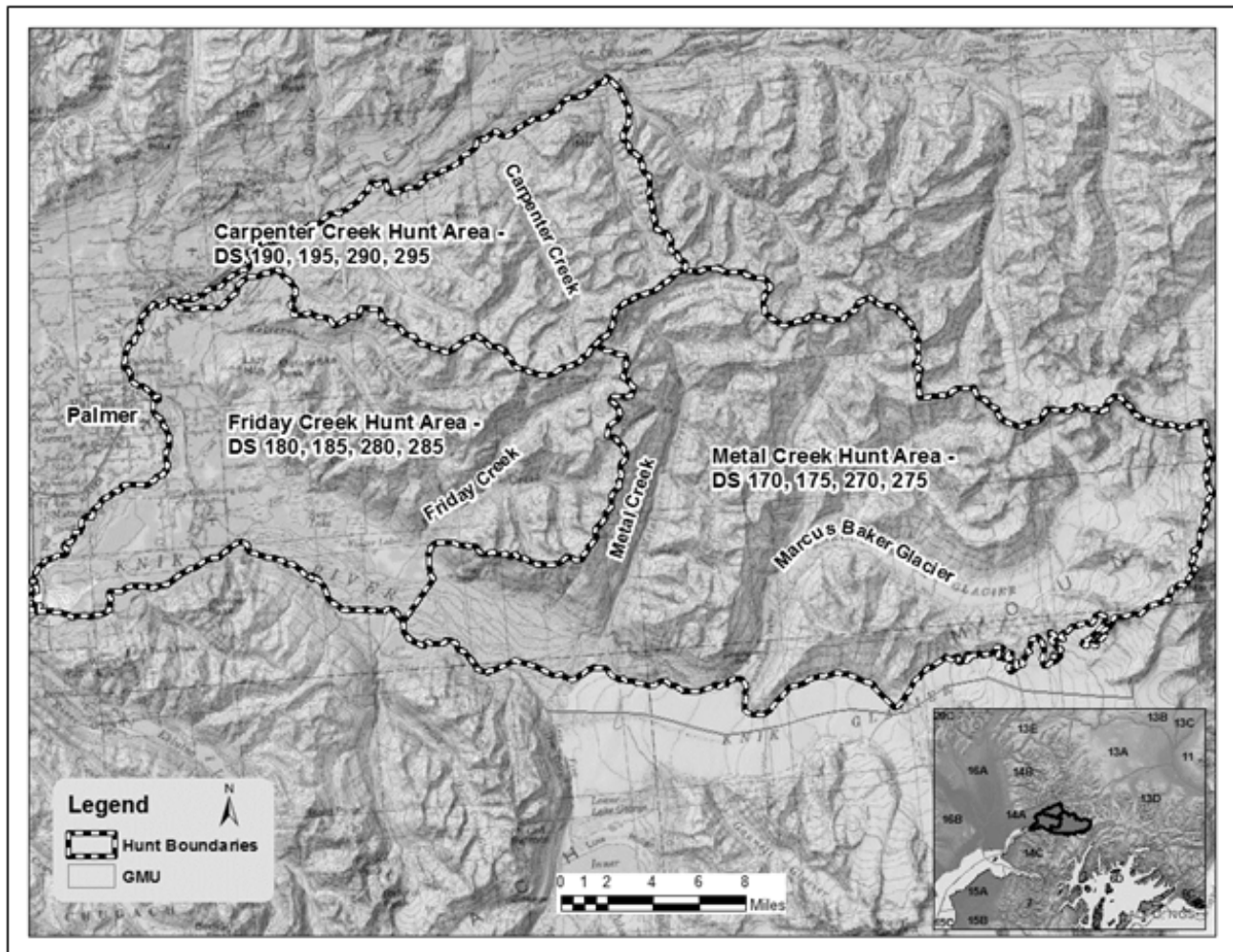


Figure 74-10. Location of the 3 Chugach Mountain draw hunt areas in Unit 14A.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create an additional 15 days to hunt full-curl sheep in the Unit 14A Chugach area limited to archery equipment only. While it is expected this hunt would have very low success rates, it would still increase harvest on an already low sheep population. The proponent suggests offering 1 to 5 permits in the foreseeable future while the populations recover from the current lows. Aircraft could be used to spot sheep if the board passes this proposal, however the proponent also notes a proposal submitted for the Statewide Regulations meeting (Proposal 98) that would extend the existing airplane restriction to cover the timeframe of this new hunt.

BACKGROUND: The board adopted regulatory changes to the hunt structure in 2007 following a decline in sheep numbers and continued high hunting pressure. The regulatory changes included the establishment of a drawing hunt structure in the Chugach Mountain areas, liberalization of bag limits in Unit 14A and western Unit 13D to include any-ram hunts, and the allocation of harvest opportunity between residents and nonresidents. The current hunt structure was also designed to

improve hunt quality by reducing hunter crowding through a drawing permit hunt structure, which reduced the number of hunters in the field by 62% in Unit 14A.

After the any ram drawing hunts were implemented in Unit 14A, sheep harvest decreased from an average of 24 rams (2000–2007) to 16 rams (2008–2022) (Table 74-1). The current level of harvest is sustainable and has not been a driving factor for the population decline. The population declines that have been observed in recent years are largely due to poor weather conditions. Under the any ram hunt structure the pressure on the full curl segment of the population was significantly reduced while still allowing for several trophy rams to be available to hunters dedicated to finding large rams (Table 74–2). The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system.

In RY2023, the board changed the bag limit to one ram with full-curl horns or larger, both horns broken, or at least eight-years-old.

Table 74-1. Unit 14A Dall sheep ram composition survey results and associated harvest, RY98–RY23.

	Total Permits	Total Hunters	Total Harvested	% Success	Average of Length Longest Horn	Max Length of Longest Horn	Average of Age
Pre-Draw							
2002	-	104	20	19	34.5	38.5	8.4
2003	-	103	22	21	35.9	40.5	8.9
2004	-	113	32	28	36.1	42.1	8.5
2005	-	104	29	28	36.5	41.4	8.4
2006	-	125	24	19	36.1	40.5	8.5
2007	-	104	22	21	35.4	40.9	8.6
Post-Draw (Any-Ram)							
2008	40	28	9	32	32.8	38.3	6.7
2009	40	26	11	42	27.6	36.9	5.5
2010	40	21	6	29	29.4	36.0	6.7
2011	50	40	14	35	35.0	38.0	7.4
2012	50	40	13	33	32.7	38.6	7.2
2013	75	41	18	44	30.6	40.8	6.9
2014	74	53	18	34	33.2	41.3	7.1
2015	75	53	22	42	32.5	39.3	7.3
2016	75	53	15	28	32.5	40.8	7.5
2017	75	55	25	45	30.8	38.8	6.5
2018	64	49	20	41	30.8	40.3	5.8
2019	64	50	24	48	30.1	38.1	5.1
2020	52	40	14	35	32.1	37.9	5.6

2021	53	40	11	28	30.1	37.0	6.1
2022	48	35	15	43	32.1	39.6	6.7
Post-Draw (Full-Curl)							
2023	14	10	3	30	34.6	37.1	10.0

Table 74-2. Unit 14A draw Dall sheep harvest, hunter success, horn length, and associated age pre- and post-draw RY02–RY23.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested ^a	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
1998	218	28	38	135.71%	190	0	0%
2002	276	19	32	168.42%	257	0	0%
2006	167	26	35	134.62%	141	0	0%
2007	145	18	34	188.89%	127	0	0%
Post Draw (Any-Ram)							
2009	134	8	0	0.00%	126	11	9%
2010	167	14	3	21.43%	153	3	2%
2012	177	16	5	31.25%	161	8	5%
2013	168	11	7	63.64%	157	11	7%
2014	172	13	9	69.23%	155	9	6%
2017	254	14	7	50.00%	240	18	8%
2019	207	10	4	40.00%	197	20	10%
2020	197	14	1	7.14%	183	13	7%
2022	120	9	6	66.67%	111	9	8%
Post Draw (Full-Curl)							
2023	142	13	2	15.38%	127	1	1%

^a Percent full curl harvested is in relation to the number of full curl rams observed during the most recent surveys. Percentages greater than 100% indicate that more rams were harvested than were observed during that year's survey.

The current hunt structure was in part designed to improve hunt quality by reducing “hunter crowding” through a drawing permit, which reduced the number of hunters in the field by 62% in Unit 14A after moving to draw and reduced it substantially further after restricting it to full curl in 2022. Given the low success rates of bow hunters permit levels could be higher than is given out during the regular draw period of August 10–September 20.

Some full curl rams survive the regular hunting season each year based on the survey and harvest data (Table 74-2). The harvest of full curl rams is not considered a biological concern for the sheep population. Access to the proposed hunt area is difficult and is primarily via aircraft (53%). There will likely be weather related complications that are associated with access to this late in the season

and the ability to hunt as this area frequently has early winter conditions during the proposed hunt dates.

Unit 14C has two similar archery-only hunts to this proposed hunt; DS140, held the first 10 days of October, and DS141, held during the month of September. The 10-year average success rate for these hunts is 9%, with an average harvest of 4.6 rams from 81.1 permits issued (Table 74-3). With the proposed hunt being full curl rams, only late season, and access being more difficult than 14C, success rates are expected to be even lower.

Table 74-3. Unit 14C DS140 and DS141 participation and harvest RY14–RY23.

Reg Year	Permits	Hunted	Harvested	Participation	Success Rate
2014	81	43	3	53%	7%
2015	81	39	2	48%	5%
2016	82	55	4	67%	7%
2017	81	50	8	62%	16%
2018	81	54	5	67%	9%
2019	81	54	6	67%	11%
2020	81	56	7	69%	13%
2021	81	40	3	49%	8%
2022	81	47	5	58%	11%
2023	81	50	3	62%	6%
Average	81.1	48.8	4.6	60%	9%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of Dall sheep hunting opportunity to archery hunters. The department has not identified a biological concern for sheep managed under the full-curl harvest strategy. Due to recent declines in this sheep population, additional harvest is not recommended, and while slight, adoption of this proposal is expected to result in an increase in the number of sheep harvested.

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

PROPOSAL 75 - 5 AAC 92.122 Intensive Management Plan VI. Add department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan (IM).

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would authorize department staff to remove predators (black bears, brown bears and wolves) with the use of aircraft, including helicopters, to achieve reduction goals.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.122 Intensive Management Plan VI.

...

(b) Unit 16 Predation Control Area

...

(4) authorized methods and means are as follows:

(A) hunting and trapping of wolves by the public in the Unit 16 Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles as provided in [5 AAC 92.080](#);

(B) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land-and-shoot permits as a method of wolf removal under [AS 16.05.783](#);

(C) hunting of black and brown bears by the public in the Unit 16 Predation Control Area during the term of the program will occur as provided in the hunting regulations set out elsewhere in this title;

(D) the commissioner may issue public bear control permits to reduce the black bear and brown bear populations within the Unit 16 Predation Control Area by the following methods and means: (i) legal animal is any black bear, including sows and cubs, and any brown bear, except sows with cubs of the year and cubs of the year; (ii) no bag limit; (iii) same-day-airborne taking of bears if the permittee is at least 300 feet from the airplane; (iv) same-day-airborne taking of bears if the permittee is at least 300 feet from the aircraft, including the use of any type of aircraft, such as fixed-wing aircraft or helicopter, to access bear baiting stations from April 15 through October 15, except that helicopters may not be used from August 5 through September 25; (v) April 15 through October 15 baiting season for bears; up to four bear bait stations per permittee; (vi) repealed 6/23/2022 (vii) repealed 6/23/2022 (viii) repealed 6/23/2022 (ix) repealed 6/23/2022.

....

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted department staff would be able to remove predators as part of the IM plan. The department is more efficient in predator removal than the public and could achieve predator reduction goals efficiently when necessary. Moose calf survival in Unit 16 should increase expediently if predator reductions were to occur over a shorter, more precise timeframe.

BACKGROUND: The department would like to have the ability to allow staff to conduct predator control as part of the IM plan for Unit 16, in the event that public participation is insufficient to meet removal objectives specified in the IM plan. In the spring 2023 a minimum count of wolves in Unit 16 was conducted. Twenty-three packs were located with a minimum

count of 118 wolves identified from direct observation and observation of tracks. Additional packs are known to inhabit areas that were not checked due to time and weather constraints. The department projected 150–180 wolves in Unit 16 in the Spring of 2023. To achieve the reduction objective of 35–55 wolves remaining, at least 115 wolves would need to have been removed. During RY23 only 77 wolves were removed and only 60 of those were taken by Same-Day-Airborne (SDA) efforts. This rate of wolf removal will not achieve reduction goals as wolves have high reproductive rates and harvest is likely near replacement rates.

The relatively low harvest from the SDA program was due to lower than anticipated participation by the permitted pilots. Pilots expressed that low participation in the Unit 16 program was due to having a better alternative (Unit 13) where conditions for SDA were better. Additionally, the wolves in Unit 16 had high rates of infestation of biting dog lice (50%) and the resulting poor-quality hides that reduced financial incentive to harvest those wolves.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Predator removal is a tool that can be necessary to achieve and maintain the Unit 16 moose population within objectives where public participation may not be sufficient to achieve predator reduction goals. Most other existing IM plans allow for staff to conduct IM, however when the existing Unit 16 plan was written there was a large desire by the public to be the ones to conduct control and as a result, staff participation was not part of the original IM plan. Through the years since the original plan was written the department has refined its ability to conduct precise predator removal efforts which result in a greater recovery response from prey populations.

COST ANALYSIS: Adoption of this proposal would result in significant costs to the department if department staff conduct control activities.

PROPOSAL 76 - 5 AAC 92.085 (8) Unlawful methods and means; exceptions. Allow the take of brown bear in Unit 16B-remainder the same day airborne.

PROPOSED BY: Jon Kruger

WHAT WOULD THE PROPOSAL DO? This proposal would allow the harvest of brown bears the same day airborne in Unit 16B-remainder without requiring them to be at a permitted bait station provided they were 300 feet from the airplane.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations can be found in 5 AAC 85.020 and in the *2023–2024 Alaska Hunting Regulations*.

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

...

Unit 16(A) 2 bears every regulatory year	July 1 – June 30	July 1 – June 30
Unit 16(B), that portion within a one-mile radius of the mouth of Wolverine Creek at 60.80° N. lat., 152.31° W. long. 2 bears every regulatory year	Sept. 15 – May 31	Sept. 15 – May 31
Remainder of Unit 16(B) 2 bears every regulatory year	July 1 – June 30	July 1 – June 30

Hunters can harvest brown bears over bait. The bear baiting seasons are July 1 – Oct. 15 and Apr. 15 – June 30. Unit 16B has a negative customary and traditional use finding for brown bears.

....

5 AAC 92.085 (8)

It is against the law to hunt or help someone take big game until 3:00 am the day following the day a hunter has flown.

Exceptions:

- You may hunt deer the same-day-airborne (SDA; provided you are 300 feet from the airplane)
- In specified units (including Unit 16) black bears may be taken at permitted bait stations provided you are at least 300 feet from the airplane.
- In specified units (including Unit 16) brown bears may be taken at permitted bait stations provided you are at least 300 feet from the airplane.
- You may hunt black bear in Unit 16 from Oct. 1 – Aug. 9 the same day you have flown, provided you are at least 300 feet from the air.

....

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would allow bear hunters to hunt brown bears the same day they have flown in Unit 16B outside of the restricted area one mile from the mouth of Wolverine Creek. This specifically allows the practice of spotting brown bears from the air and then landing to pursue them. It will also provide the opportunity to harvest bears that were not seen from the air but were encountered the day that the hunter flew into the unit. Adoption of this proposal is expected to increase harvest of brown bears.

BACKGROUND: In 2007 line transect surveys for bears in Unit 16B showed a brown bear population of 625–1,250. The goal of the intensive management was to reduce the brown bear population to 375 brown bears on mainland 16B. Bear harvests increased initially under the program but have since returned to their pre-control levels. Modelling by the department showed that the predator control program had little effect on the brown bear population in Unit 16 and was suspended in November 2016.

As a component of the predation control program in Unit 16, SDA hunting for black bear began in 2007. At that time hunters interested in participating in the program were required to obtain a predation control permit. In addition, under that program there was no limit and permittees could take any bear including cubs and sows with cubs. SDA hunting was not allowed for brown bears during the control program except at registered bait stations.

During the control program the department did not track same-day-airborne harvest of black bears. On average during the control program 23 black bears per year were harvested by people who used airplanes for hunting, did not harvest the bear at bait, and hunted either 0 or 1 days. Circumstances for the general allowance of same-day-airborne for brown bear would be more restrictive than under the control program. SDA for black bear in 16 was approved in 2022. Under general season, an average of 19 black bears per year were harvested by people who used airplanes for hunting, did not harvest the bear at bait, and hunted either 0 or 1 days.

In Unit 16 brown bears are frequently targeted in the spring while snow allows for locating tracks and animals from the air. Snow and ice provide benefits for air access to locations that are not typically accessible to aircraft in snow free periods. During snow free periods spotting brown bears from the air in locations that are conducive to landing planes would be limited as most of the unit is either heavily forested or swamp. Due to the remote nature of the unit many people use aircraft for accessing their residence and camps. This proposal would allow them to harvest brown bears the day they arrive likely without using the aircraft for locating the brown bears.

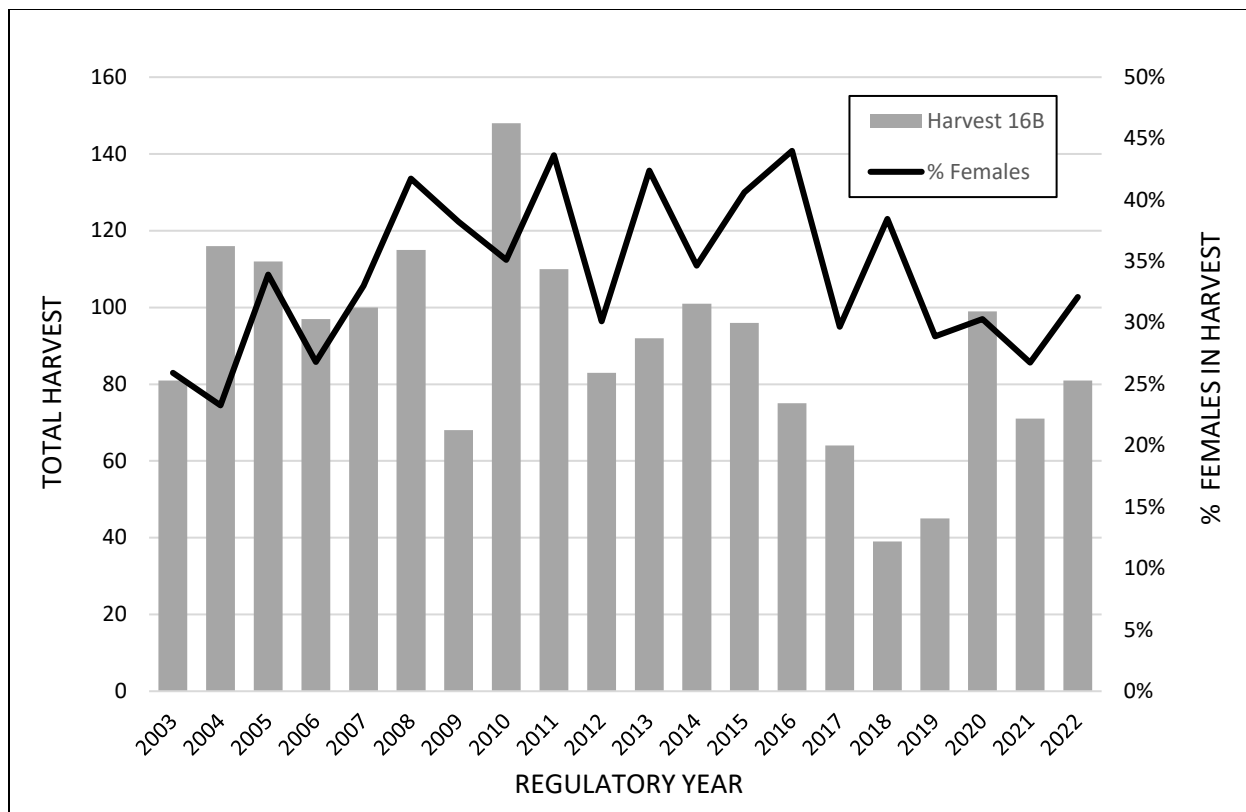


Figure 76-1. Unit 16B brown bear harvest and percent females in harvest, RY2003–2022.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it has not identified a biological concern for bears in Unit 16B-remainder.

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

PROPOSAL 77 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Extend the brown bear hunting season in Unit 14B.

PROPOSED BY: Matanuska Valley Advisory Committee

WHAT WOULD THE PROPOSAL DO? Extend the brown bear season in Unit 14B by 15 days from May 31 to June 15.

WHAT ARE THE CURRENT REGULATIONS? Unit 14B is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Unit 14B regulations allow 1 brown bear every regulatory year between August 1–May 31 and may be taken over a black bear bait station. Baiting season for black bears is April 15–June 30.

In Unit 14B no baiting is allowed within one-quarter mile of the shorelines of the Susitna River, and the Little Susitna River, south of the Parks Highway bridge. In less developed areas, more remote areas of the region (i.e., Units 11 & 13) where brown bear densities are likely higher, seasons extend until the end of June and allow the taking of brown bears at bait stations.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide hunters with an additional 15 days added to the end of the current brown bear season extending it from May 31 to June 15. Brown bears can be harvested at black bear bait stations in this area. The adoption of this proposal is expected to result in an increased harvest of brown bears. This proposal would not result in additional conflicts with bear baiters as the black bear baiting season already extends to June 30.

BACKGROUND: The brown bear management objective for Units 14A & 14B combined is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from Regulatory Year (RY)13–RY22 in 14B was 12 bears and the average percent of males was 60% (Figure 77-1).

Brown bear in this unit are difficult to survey because the unit is heavily forested and other methods have yet to be used to develop an estimate, so the department has used surrogates of abundance such as harvest, number of nuisance bear complaints, and number of bear killed under defense of life and property (DLP). On average less than 1 brown bear in the unit is killed under DLP.

Taking brown bears at black bear bait stations became legal in Unit 14B in RY15. Since that time, an average of 86% of bears taken in the spring have been taken over bait. The harvest chronology in Unit 14B shifted from being relatively concentrated in the fall season to being skewed toward the second half of May in RY18, after taking of brown bears at bear bait stations became legal in this unit (Table 77-1).

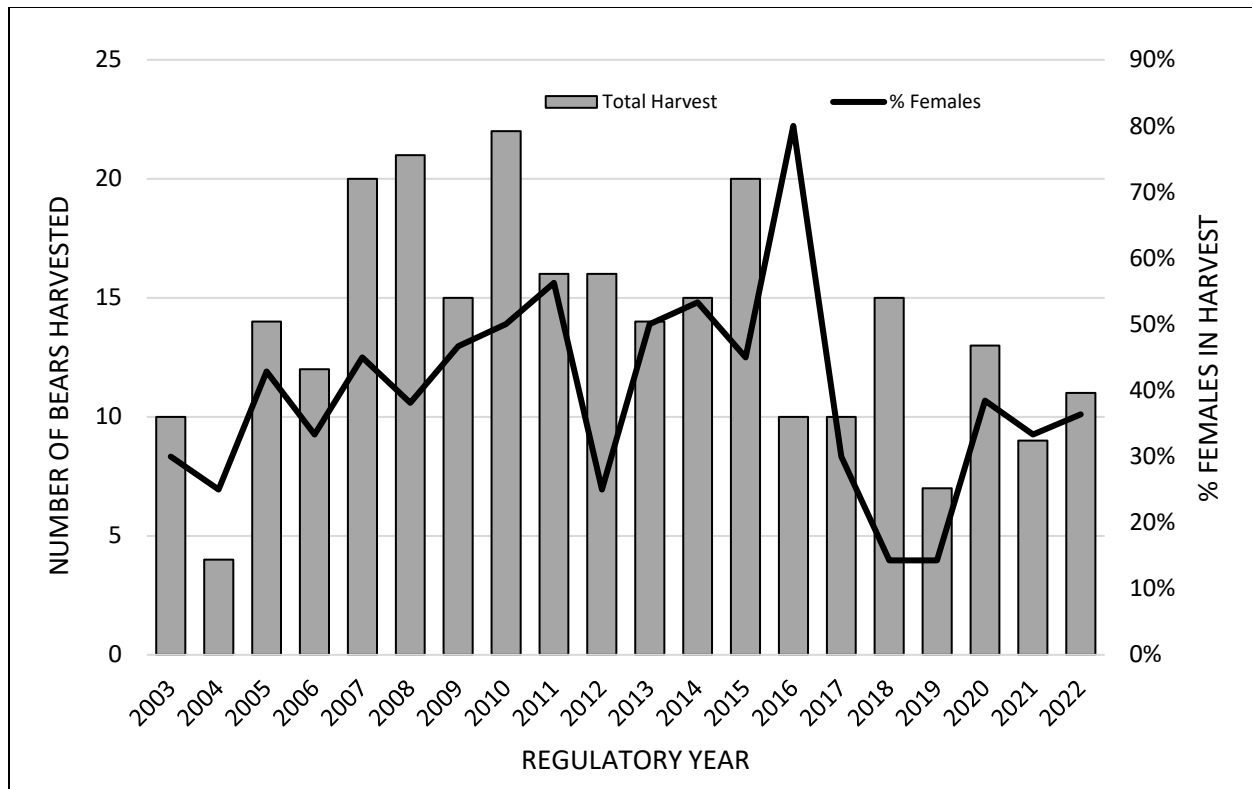


Figure 77-1. Unit 14B total brown bear harvest and percent female in harvest, RY2003–2022.

Table 77-1. Chronology of the harvest of brown bears in Unit 14B, RY2018–2022.

Reg. Year	July	August		September		October	May		June	Total
	1–31	1–15	16–31	1–15	16–30	–April	1–15	16–31	1–30	
RY18	7%	7%	20%	13%	7%	0%	0%	47%	0%	15
RY19	0%	0%	14%	29%	29%	14%	0%	14%	0%	7
RY20	8%	0%	23%	0%	31%	15%	15%	8%	0%	13
RY21	0%	0%	0%	11%	11%	33%	0%	33%	11%	9
RY22	9%	9%	0%	18%	27%	9%	9%	18%	0%	11

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it has not identified a biological concern for bears in Unit 14B. Adoption of this proposal is expected to increase harvest of brown bears, and aligning the brown bear season with the black bear season reduces regulatory complexity for hunters.

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

PROPOSAL 78 – 5 AAC 92.039. Permit for taking wolves using aircraft; 5 AAC 92.085. Unlawful methods of taking big game; exceptions; 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions; Allow the same day airborne take of wolves in the active Unit 16 Intensive Management area.

PROPOSED BY: Greg Nelson

WHAT WOULD THE PROPOSAL DO? This proposal would allow people who possess a hunting or trapping license to harvest wolves with a firearm the same day that they have flown in an airplane within the active Unit 16 Intensive Management (IM) area, provided they are 300 feet from the airplane.

WHAT ARE THE CURRENT REGULATIONS?

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;

There is a positive C&T finding for wolves in Unit 16 outside of the nonsubsistence area with an ANS of 0-5 wolves.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted anyone who possess a hunting or trapping license may participate in wolf harvest with a firearm the same day that they have flown (SDA) within active Unit 16 IM areas provided that they are 300 ft. from the aircraft. Taking wolves the same day a person has been airborne is only allowed under the conditions of a permit as part of a control program.

BACKGROUND: By statute, [AS 16.05.783 (a)] allowing the take of wolves using an aircraft SDA, can only be authorized where a predator control program, as part of Intensive Management, has been adopted. There is an active IM plan for wolves in Unit 16 under 92.122 that identifies predation by wolves (and bears) is an important cause of not achieving moose harvest and population objectives.

Current SDA programs require the department to permit pilots and gunners to participate. The department approves pilots on a limited basis based on pilot experience and having participated in an SDA program previously for concerns of safety and increased tracking of the program.

DEPARTMENT COMMENTS: The board does not have the authority to allow what the proponent is requesting because statute prohibits the take of wolves the same day a person has been airborne unless under the conditions of a permit issued as part of an intensive management program.

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

PROPOSAL 79 - 5 AAC 84.270 Furbearer trapping. Extend the wolf trapping season in Unit 14A.

PROPOSED BY: Michael Gozdor II

WHAT WOULD THE PROPOSAL DO? This proposal would extend the wolf trapping season in Unit 14A by 30 days from the current date of November 10–March 31 to November 10–April 30.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. Current regulations can be found in 5 AAC 84.270 and in the *2024–2025 Alaska Trapping Regulations*.

5 AAC 84.270

Species and Units	Open Season	Bag Limit
(13) Wolf		
...		
Units 6, 11, 14(A), and 18	Nov. 10 – Mar. 31	No limit.
...		
Units 14(B) and 17	Nov. 10 – Apr. 30	No limit.

Units 12, 13, and 16

Oct. 15 – Apr. 30

No limit.

...

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, trappers would have an additional 30 days to trap wolves in Unit 14A which would likely increase wolf harvest. The current hunting season allows for the take of wolves during the proposed dates, without the use of traps or snares. Extending the trapping season is not expected to increase wolf harvest but could potentially result in the incidental trapping of other species. In addition, this proposal would align the end of wolf trapping season in Unit 14A with adjacent Units 14B and 16, simplifying the regulations.

BACKGROUND: The trapping season extends through April 30 in all other units of Central-Southwest Region IV except for Units 11 and 14A. Wolf seasons have remained unchanged in 14A since 1981. Wolf harvest in Unit 14A has averaged 5 per year for the last 10 years. The peak harvest in a year is 10 and the lowest annual harvest is 0 (Figure 79-1). Wolf harvest in 14A remains relatively low due to the wolf population being maintained at relatively low density due to high human use of the area.

Wolf harvest chronology in Units 14A, 14B, and 16 indicates that there is a significant pulse of harvest during the fall hunting season in August and September. The peak harvest occurs in January and remains high in February then declines in March and further in April.

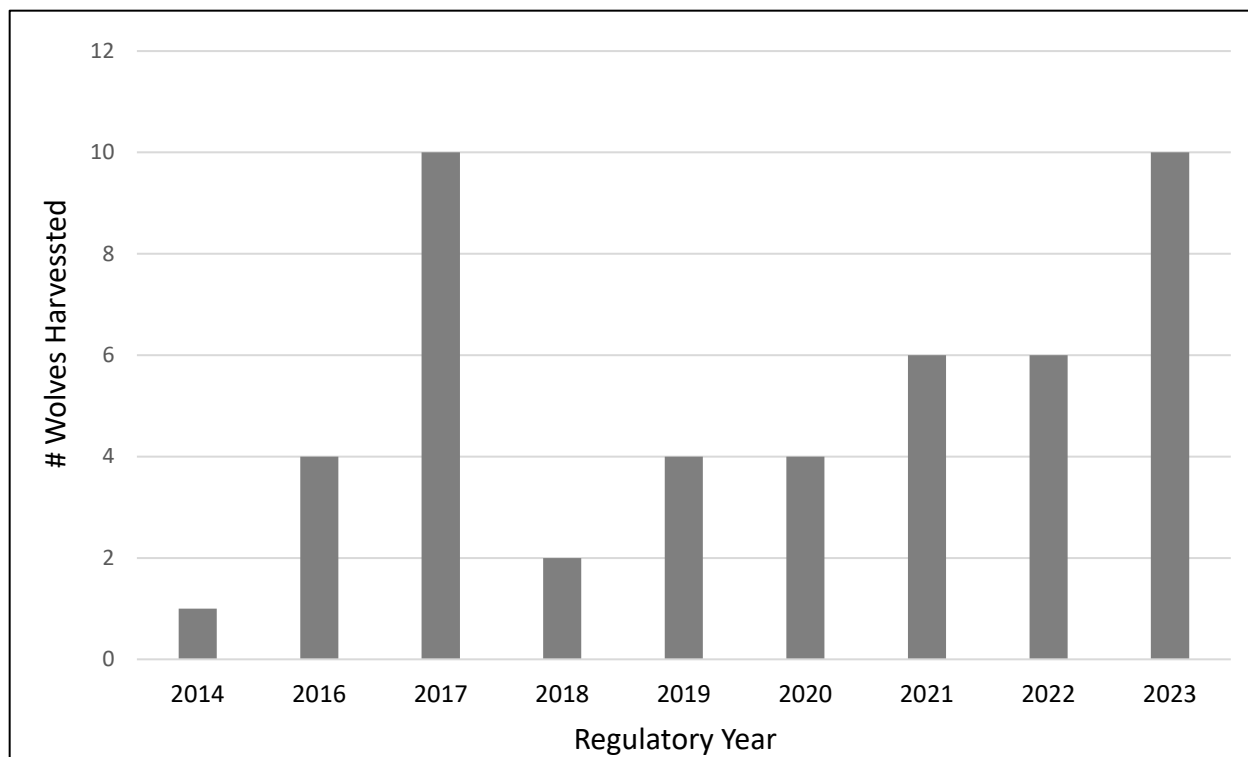


Figure 79-1. Unit 14A Wolf harvest, RY2014–2023.

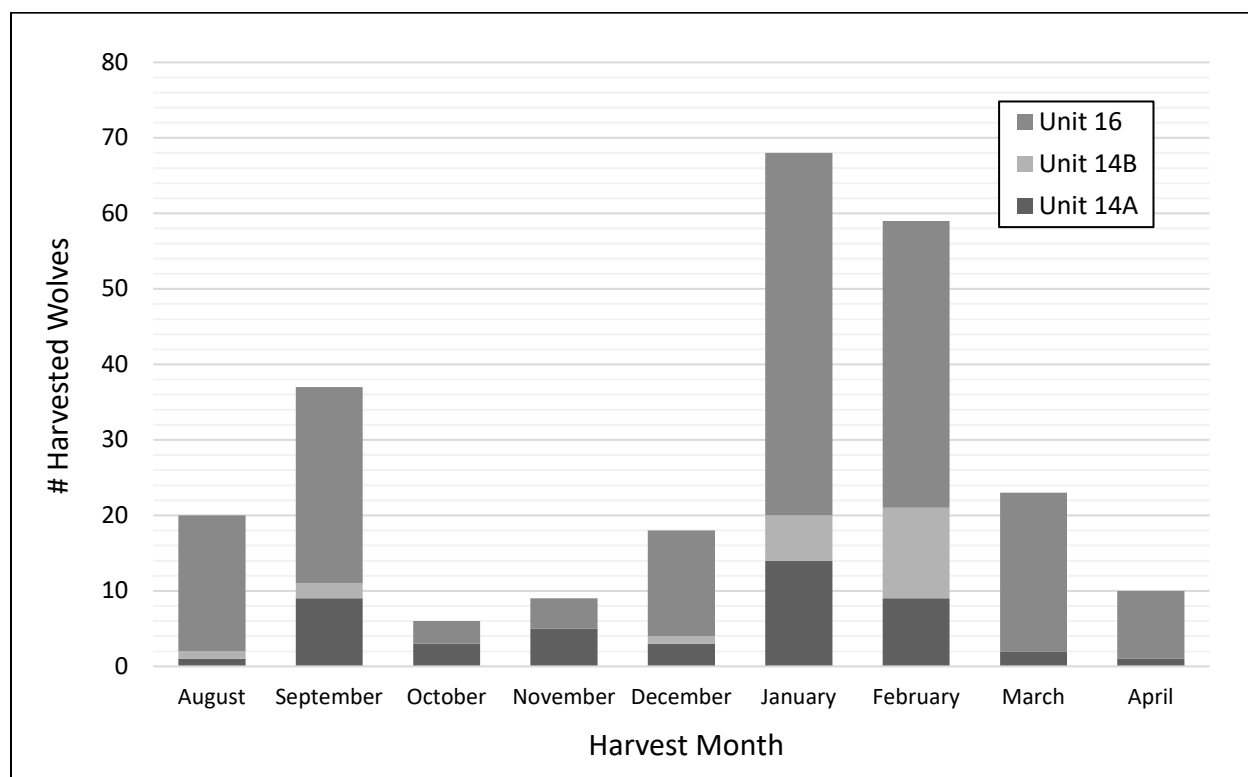


Figure 79-1. Chronology of wolf harvest in Units 14A & B and 16, RY2014–2023.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because there is currently no biological concern for wolves in Unit 14A, and the proposal reduces regulatory complexity by aligning seasons within the Central-Southwest Region IV. If adopted, this proposal is not expected to increase wolf harvest substantially.

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

PROPOSAL 80 - 5 AAC 84.270(1). Furbearer trapping. Require sealing of beaver taken in Unit 16.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would require the hide of all beaver harvested in Unit 16 to be sealed.

WHAT ARE THE CURRENT REGULATIONS? The current beaver trapping regulations for Unit 16 can be found in 5 AAC 84.270 and in the *2023–2024 Alaska Trapping Regulations*, and current beaver hunting regulations for Unit 16 can be found in 5 AAC 85.060 and in the *2023–2024 Alaska Hunting Regulations*.

- Beaver taken in Units 9–11, 13, 14A, 14B, and 17 must be sealed within 30 days after the close of the season. There is no sealing requirement in Unit 16.
- You may not disturb or destroy any beaver house or den.
- It is against the law to take a beaver by any means other than a steel trap, snare, firearm, or bow and arrow.
 - In Units 11, 13, and 16 from September 25–November 9, traps and snares must be submerged.

Unit	Season Date	Bag Limit
Unit 9 & 17	Oct. 10–May 31	No Limit
Units 11, 13, & 16	Sept. 25–May 31	No Limit
Units 14A & 14B	Nov. 10–May 15	No Limit

5 AAC 92.990 "sealing" means the placement of an official marker or locking tag (seal) by an authorized representative of the Department of Fish and Game on an animal hide or skull, and may include; (A) collecting and recording biological information concerning the conditions under which the animal was taken; (B) measuring the specimen submitted for sealing; and (C) retaining specific portions of the animal for biological information, such as a pre-molar tooth from a bear;

There is a positive customary and traditional use finding for beaver in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion. Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted all beaver harvested in Unit 16 (i.e., trapping and hunting) would have to be brought in for sealing. This creates an additional step for trappers although it is standard in many other units to seal furbearers including beaver. The department would be able to accurately track harvest of beaver and collect additional information from the trapper for monitoring and management purposes.

BACKGROUND: Beavers must be sealed in all units within the Central-Southwest Region IV except Unit 16. The sealing requirement for beaver taken in Unit 16 was eliminated in 2011 as a result of the board adopting a public proposal. At that time, the department stated that there was no concern for over-exploitation. The average annual harvest in Unit 16 from 2001 through 2010 was 86 beavers. The Palmer Fish and Game office has issued an average of 9 nuisance beaver permits in Unit 16 per year during the last 5 years to address damage by beavers outside of typical hunting and trapping seasons.

The department does not have any conservation concerns with beavers in Unit 16. The amount of trapping effort appears to be a fraction of what it was in the past, and harvest likely reflects that decline in effort. Observations of beaver sign during aerial surveys and activity as well as discussions with moose hunters, trappers, and department fisheries staff indicate that beavers are wide-spread and abundant throughout most of the Central/Southwest Region.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it has not documented a biological or conservation concern for the beaver populations in Unit 16. However, the department recognizes the additional harvest information that sealing can provide. Anecdotal information suggests that beaver remain abundant in the unit. Sealing may be cumbersome for some remote residents. If the board adopts this proposal with these additional requirements, the board may wish to determine if reasonable opportunity is still provided for subsistence.

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

PROPOSAL 81 - 5 AAC 92.095 Unlawful methods of taking furbearers. Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours.

PROPOSED BY: Kneeland Taylor

WHAT WOULD THE PROPOSAL DO? If adopted this proposal it would require all traps and snares for all species of furbearers within 2 miles of publicly maintained roads in Unit 14A to be checked at regular intervals not exceeding 36 hours.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current trapping regulations for Unit 14A can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Trapping Regulations*.

Currently, there are no time-dependent requirements to check traps in Central-Southwest Region IV. The only trap check requirement in Alaska is in Unit 1C (Gustavus area), which requires traps to be checked every 3 days (72 hours).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All traps or snares that are set within 2 miles of publicly maintained roads in Unit 14A would be required to be checked every 36 hours (1.5 days). This timeframe for trap checking would require that trappers check their traps every day and would likely decrease trapper effort substantially as well as hinder trapping success by increasing human scent/activity along a trapline.

BACKGROUND: Trapping has been a tradition and economic lifestyle of Alaskans since before statehood. The goal of trapping is to harvest furbearers for their pelts. Trappers have options such as killer-style traps, snares, hanging sets, and drowning sets that quickly kill captured animals. Trappers use techniques including the time interval of checking traps to achieve optimal catch rates as well as optimal quality of hides.

It will be difficult for trappers to visit their trap sites every 36 hours. Although this proposal limits the requirement to within 2 miles of maintained roads, many trappers begin at a road but travel many miles on foot or snowmachine to complete a trapline. Those who do not rely on trapping as a full-time profession will find it nearly impossible to check traps daily as many traplines are in remote areas. Often weather conditions prevent reliable travel even on publicly maintained roads during the trapping season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative in nature. This proposal will create an obstacle to trapping and will likely have a profound impact on the way trappers have operated in the past. A daily trap check requirement will reduce trapping effort. The department is opposed to unnecessary reductions in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics. If adopted, there may be an expectation of the department to provide a definition of publicly maintained roads, and requests for maps indicating such roads and a visual presentation of a two mile buffer. The department does not maintain this type of information.

COST ANALYSIS: Adoption of this proposal may result in additional costs to the department if directed to provide maintained road and two mile buffer information.

PROPOSAL 82 - 5 AAC 92.550. Areas closed to trapping. Require 50-yard trapping setbacks from known multi-use trails in Units 14A and 14B.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? The proposal would require all traps set within 50 yards of the following “multi-use” trails be:

- elevated at least 3 feet above hard ground,
- enclosed,
- under water; or
- under ice.

Talkeetna Area (Mat-Su Borough)

- Talkeetna Lakes Park trail system (XYZ Lakes trails)
- Dorothy Jones Trail System (Susitna Valley High School)

Matanuska Lakes State Recreation Area (State)

- All developed trails

Palmer Hay Flats (State)

- Scout Ridge Loop
- Reflections Lake Trail
- Nelson Road
- Rabbit Slough Boat Launch Access Road
- Wasilla Creek Boardwalk (Nelson Road)

Hatcher Pass Area (State)

- Government Peak Recreation Area developed trails system within the southern development area
- Independence Mine Ski Trails
- Gold Mint Trail to Mint Glacier
- Reed Lakes Trail to Lower Reed Lake
- Archangel Road to the gate

WHAT ARE THE CURRENT REGULATIONS? Units 14A and B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current areas closed to trapping in Alaska are listed in 5 AAC 92.550 but there are no areas listed in Unit 14A or 14B.

Area-specific state, federal, and municipal trapping restrictions occur throughout Alaska. The department does not maintain a catalogue of municipal or private land restrictions. The trails identified in this proposal in Talkeetna are not state trails or on state land.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would make it illegal to trap within 50 yards of specific multi-use trails in Unit 14A and 14B unless the traps were elevated 3 feet above ground, under water, under ice, or enclosed, allowing trapping to still take place while decreasing the risk of conflicts with pet owners. The proposal may result in decreased opportunity to take furbearers. Conflicts between user groups are not recorded and the extent is unknown.

BACKGROUND: Ethical and safe trapping practices are actively encouraged and taught throughout the state by private trapping associations. The department relies heavily upon the experience and collaboration of local trappers to pursue and deal with furbearers that people may have conflicts with.

Many trails that trappers have historically used in the Mat-Su were originally established by trappers and over time use has diversified as development and the human population has expanded. Many of these same areas have regulations under different authorities to restrain pets to minimize user conflicts and for safety. The department does not maintain a record of pets caught in traps and reporting is inconsistent. Some reports in the Mat-Su indicate that incidents occurred on or near multi-use trails or trailheads, along with some on private land.

This proposal is the result of a BOG-directed public stakeholder meeting that occurred on February 14, 2022. The meeting was facilitated by the board, and attended by representatives from Alaska Wildlife Alliance, local trappers associations, and department staff.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is primarily allocative. The department is generally opposed to a reduction in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics. Similar proposals have been adopted by the board in other areas of the state (e.g., Juneau trails) with unknown results in reducing conflicts.

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

PROPOSAL 83 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Extend the spring hunting season for ptarmigan in Unit 16.

PROPOSED BY: Jonathon Green

WHAT WOULD THE PROPOSAL DO? This proposal would extend the ptarmigan hunting season in Unit 16 by an additional 30 days from March 31 through April 30.

The proposal lists two potential options:

3. August 10 – April 30, while maintaining the bag limit of 10 ptarmigan per day, 20 in possession.

OR

4. August 10 – March 31, with a bag limit of 10 ptarmigan per day, 20 in possession, decreasing to 5 ptarmigan per day, 10 in possession from April 1 – April 30.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

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Units and Bag Limits	Resident & Nonresident Open Season (Subsistence & General Hunts)
Unit 16, 10 per day, 20 in possession	Aug. 10 – Mar. 31

...

There is a positive customary and traditional use (C&T) finding for ptarmigan in Unit 16 outside of the nonsubsistence area. The Board of Game (board) has not set an amount reasonably necessary for subsistence (ANS). Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase hunting opportunity and potentially harvest during the spring breeding period for ptarmigan within Unit 16.

BACKGROUND: The current hunting season length for ptarmigan has been in place in Unit 16 since 1990 (34 years). Since 1990, bag limits in Unit 16 have changed once (last bag limit change was in 1997). Outside of Unit 16, the majority of other units that have seasons extending through or beyond the month of April are either completely off the road system or away from major human population centers. The exceptions being Units 12, 20, and 25C, where in 2004 the board gave the department the authority to adjust season dates and bag limits by emergency order. Since 2004 late-season (March 1–April 30) bag limits in Units 12, 20, and 25C have been reduced from 20 to

5 per day and from 40 to 10 in possession to protect the breeding population of ptarmigan in accessible areas within those units.

Voluntarily submitted hunter-harvested ptarmigan samples from across the state (RY2011–2023) suggest harvest is high in the fall, relatively low during the winter, followed by an increase in the spring. The increase in harvest in the spring coincides with the return of longer days and warmer temperatures and generally good snow conditions for snowmachine travel. Specific to Unit 16 (All subunits; RY2011–2023), roughly 17% of the hunter-harvested ptarmigan samples submitted came from the month of March. While the department does not receive nearly as many wings from this unit as from nearby Unit 13, late-season harvest would likely continue at high levels if the season were extended through the month of April.

This proposal presents two different harvest scenarios for consideration: one maintaining the same bag limit (10 per day, 20 in possession) through the entirety of the season, and a second providing a reduced bag limit (5 per day, 10 in possession) through the month of April. While a reduced bag limit scenario may seem like a logical compromise for extending the hunting season into the breeding season, two separate small game hunter surveys showed the average daily ptarmigan harvest per hunter in Unit 13 (a nearby unit with substantial harvest pressure) was less than 2 ptarmigan per day. This suggests a daily bag limit reduction from 10 per day to 5 per day for the month of April likely would not offset the concentrated harvest and effort introduced by extending the season another 30 days.

Research from a department study on willow ptarmigan in Unit 13E between 2013 and 2015 identified reduced survival rates for ptarmigan at road-accessible sites in comparison to birds at remote sites in the fall (Aug. – Nov.), but no difference in survival rates after birds had dispersed from breeding sites (both remote and accessible) in the winter (Dec. – Mar.). Similarly, a department study on rock ptarmigan in Unit 13B between 2013 and 2017, found a higher risk of mortality for birds ≤ 1.9 mile from a road during the fall in comparison to birds ≥ 1.9 miles from a road. Both willow and rock ptarmigan captured during these studies showed strong site fidelity to breeding locations along the Denali Highway and at more remote locations. These findings, along with the data from hunter-harvested samples, support the concept of high harvest taking place at road-accessible locations in the fall and suggest a similar outcome will occur if seasons extend too far into the spring breeding period.

Because by mid-April ptarmigan are already establishing and defending breeding territories, late-season harvest mortality is likely additive (i.e., adds additional mortality beyond what is expected naturally) and would likely lead to reduced spring breeding densities. Consequently, increasing the amount of late-season harvest, may result in localized depletion, and particularly at accessible sites near roads. Recent regulatory changes to address localized depletion within nearby Units 13B and 13E, resulted in shortened season lengths in 2018 due to low relative abundance estimates from along the Denali Highway corridor. Furthermore, in recognition of these changes, the Federal Subsistence Board passed a Special Action Request proposed by the Denali Regional Advisory

Council in the fall of 2019, aligning federal subsistence seasons with the revised state season dates.

Extending ptarmigan hunting seasons further into the spring breeding period of the annual lifecycle of ptarmigan may be less concerning in areas with minimal or no road access and low human harvest pressure. However, the department expects substantial harvest may occur within road-accessible areas near large human population centers, which includes Unit 16.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposed ptarmigan season extension in Unit 16. If this proposal were adopted, it would provide an additional 30 days of ptarmigan hunting within Unit 16, at the potential cost of reducing breeding densities around areas accessible from the road and trail systems.

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

PROPOSAL 84 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Extend the spring hunting season for ptarmigan in Units 14A and 14B.

PROPOSED BY: Jonathon Green

WHAT WOULD THE PROPOSAL DO? This proposal would extend the ptarmigan hunting season in Units 14A and 14B by an additional 30 days from March 31 through April 30.

The proposal lists two potential options:

1. August 10 – April 30, while maintaining the bag limit of 10 ptarmigan per day, 20 in possession.

OR

2. August 10 – March 31, with a bag limit of 10 ptarmigan per day, 20 in possession, decreasing to 5 ptarmigan per day, 10 in possession from April 1 – April 30.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

...

Units and Bag Limits

**Resident & Nonresident Open Season
(Subsistence & General Hunts)**

Unit 14A, 14B,
10 per day, 20 in possession

Aug. 10 – Mar. 31

...

Unit 14 is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase hunting opportunity and potentially harvest during the spring breeding period for ptarmigan within Units 14A and 14B.

BACKGROUND: The current hunting season length for ptarmigan has been in place in Units 14A and 14B since 1990 (34 years). Since 1990, bag limits in these units have changed once (last bag limit change was in 1997). Outside of Units 14A and 14B, the majority of other units that have seasons extending through or beyond the month of April are either completely off the road system or away from major human population centers. The exceptions being Units 12, 20, and 25C, where in 2004 the board gave the department the authority to adjust season dates and bag limits by emergency order. Since 2004 late-season (March 1–April 30) bag limits in Units 12, 20, and 25C have been reduced from 20 to 5 per day and from 40 to 10 in possession to protect the breeding population of ptarmigan in accessible areas within those units.

Voluntarily submitted hunter-harvested ptarmigan samples from across the state (RY2011–2023) suggest harvest is high in the fall, relatively low during the winter, followed by an increase in the spring. The increase in harvest in the spring coincides with the return of longer days and warmer temperatures and generally good snow conditions for snowmachine travel. Specific to Unit 14 (All units; RY2011–2023), roughly 32% of the hunter-harvested ptarmigan samples submitted came from the month of March. While not as clear of a pattern exists as in nearby Unit 13, late-season harvest would likely continue at high levels if the season were extended through the month of April.

This proposal presents two different harvest scenarios for consideration: one maintaining the same bag limit (10 per day, 20 in possession) through the entirety of the season, and a second providing a reduced bag limit (5 per day, 10 in possession) through the month of April. While a reduced bag limit scenario may seem like a logical compromise for extending the hunting season into the breeding season, two separate small game hunter surveys showed the average daily ptarmigan harvest per hunter in Unit 13 (a nearby unit with substantial harvest pressure) was less than 2 ptarmigan per day. This suggests a daily bag limit reduction from 10 per day to 5 per day for the month of April likely would not offset the concentrated harvest and effort introduced by extending the season another 30 days.

Research from a department study on willow ptarmigan in Unit 13E between 2013 and 2015, identified reduced survival rates for ptarmigan at road-accessible sites in comparison to birds at remote sites in the fall (Aug. – Nov.), but no difference in survival rates after birds had dispersed from breeding sites (both remote and accessible) in the winter (Dec. – Mar.). Similarly, a department study on rock ptarmigan in Unit 13B between 2013 and 2017, found a higher risk of

mortality for birds ≤ 1.9 miles from a road during the fall in comparison to birds ≥ 3 km from a road. Both willow and rock ptarmigan captured during these studies showed strong site fidelity to breeding locations along the Denali Highway and at more remote locations. These findings, along with the data from hunter-harvested samples, support the concept of high harvest taking place at road-accessible locations in the fall and suggest a similar outcome will occur if seasons extend too far into the spring breeding period.

Because by mid-April ptarmigan are already establishing and defending breeding territories, late-season harvest mortality is likely additive (i.e., adds additional mortality beyond what is expected naturally) and would likely lead to reduced spring breeding densities. Consequently, increasing the amount of late-season harvest, may result in localized depletion, and particularly at accessible sites near roads. Recent regulatory changes to address localized depletion within nearby Units 13B and 13E, resulted in shortened season lengths in 2018 due to low relative abundance estimates from along the Denali Highway corridor. Furthermore, in recognition of these changes, the Federal Subsistence Board passed a Special Action Request proposed by the Denali Regional Advisory Council in the fall of 2019, aligning federal subsistence seasons with the revised state season dates.

Extending ptarmigan hunting seasons further into the spring breeding period of the annual lifecycle of ptarmigan may be less concerning in areas with minimal or no road access and low human harvest pressure. However, the department expects substantial harvest may occur within road-accessible areas near large human population centers, which includes Units 14A and 14B.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If this proposal were adopted, it would provide an additional 30 days of ptarmigan hunting within these Units, at the potential cost of reduced breeding densities around areas accessible from the road and trail systems.

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

END