ALASKA DEPARTMENT OF FISH AND GAME STAFF COMMENTS FOR PROPOSALS 24, 43-44, 55-56, 60-62, and 80 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 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

<u>WHAT WOULD THE PROPOSAL DO?</u> 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.

<u>WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?</u> 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
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
	ADF&G,	Snowmachine				
2017	Contractor	and Foot	15-20km	4	3**	2:1
	ADF&G,					
2020	Contractor	Snowmachine	150-250km	64	6	4:2
	ADF&G,					
2021	Contractor	Snowmachine	350-400km	45	12***	7:5
	ADF&G,					
2022	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.

<u>COST ANALYSIS</u>: Adoption of this proposal would not result in additional costs for 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

<u>WHAT WOULD THE PROPOSAL DO?</u> 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.

<u>WHAT ARE THE CURRENT REGULATIONS?</u> 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.

<u>WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?</u> 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.

		DM	325	Otl	her			
		Har	vest	Harv	vest ^a		1% of	Estimated
Regulatory	DM325					Total	Estimated	Overall Harvest
Year	Permits	Cows	Bulls	Cows	Bulls	Harvest	Cows in 13A	Rate
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%

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

^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.

<u>COST ANALYSIS</u>: 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

<u>WHAT WOULD THE PROPOSAL DO?</u> 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.

<u>WHAT ARE THE CURRENT REGULATIONS?</u> 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.

		DM327					
		Harvest	Other H	Harvest ^a		1% of	Estimated
Regulatory	DM327				Total	Estimated	Overall
Year	Permits	Cows	Cows	Bulls	Harvest	Cows in 13C	Harvest Rate
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%

Table 44-1. Antlerless moose permits and total harvest in Unit 13C, RY2012–2023.

^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 44-2. 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.

<u>COST ANALYSIS</u>: 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.

<u>WHAT ARE THE CURRENT REGULATIONS?</u> 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 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.

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.

<u>WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?</u> 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.

Regulatory	D		D		% Female in
Year	Permits	Harvest	Permit Success	Hunter Success	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

Table 55-1. DG720 permit numbers, harvest, success rates, and percentage of females in harvest, RY2011–2024.

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.

<u>COST ANALYSIS</u>: 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 archeryonly 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.

<u>WHAT ARE THE CURRENT REGULATIONS?</u> 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).

		Hı	unted	Ha	rvest			
						Total	% of harvest	% of harvest
RY	Permits	Unit 11	Unit 13D	Unit 11	Unit 13D	Harvest	nonresident	male
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 56-1. Permits, hunters, and harvest in RG580 hunt, RY2014–2023.

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..

<u>COST ANALYSIS</u>: 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 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.

<u>WHAT ARE THE CURRENT REGULATIONS?</u> The current coyote trapping regulations can be found in 5 AAC 84.270 and in the 2024-2025 Alaska Trapping Regulations.

J AAC 84.270		
Species and Units	Open Season	Bag Limit
(2) Coyote		
Units 6, 9-11, 13, 14(A),	Nov. 10 – Mar. 31	No limit.
14(B), and 16-18		
Units 12 and 20(E)	Oct. 15 – Apr. 30	No limit.

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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.

<u>COST ANALYSIS</u>: Adoption of this proposal is not expected to increase costs for the department.

<u>PROPOSAL 61 – 5 AAC 85.065. Seasons and bag limits for small game.</u> 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

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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).

<u>WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?</u> 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.

<u>BACKGROUND</u>: 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.

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

<u>PROPOSAL 62 – 5 AAC 85.065. Hunting season and bag limits.</u> 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.

<u>OR</u>

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

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Units and Bag Limits	Resident & Nonresident Open Season (Subsistence & General Hunts)
Unit 13A, 13C, 13D, 10 per day, 20 in possession	Aug. 10 – Mar. 31

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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 units13C 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, lateseason 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.

<u>COST ANALYSIS</u>: Adoption of this proposal would not result in additional costs for 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

<u>WHAT WOULD THE PROPOSAL DO?</u> This proposal would require the hide of all beaver harvested in Unit 16 to be sealed.

<u>WHAT ARE THE CURRENT REGULATIONS?</u> 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.

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