ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS FOR PROPOSALS 28, 40, 49, 50, 59 and 63

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 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/mi^2, 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 mi^2; 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 28-1. 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

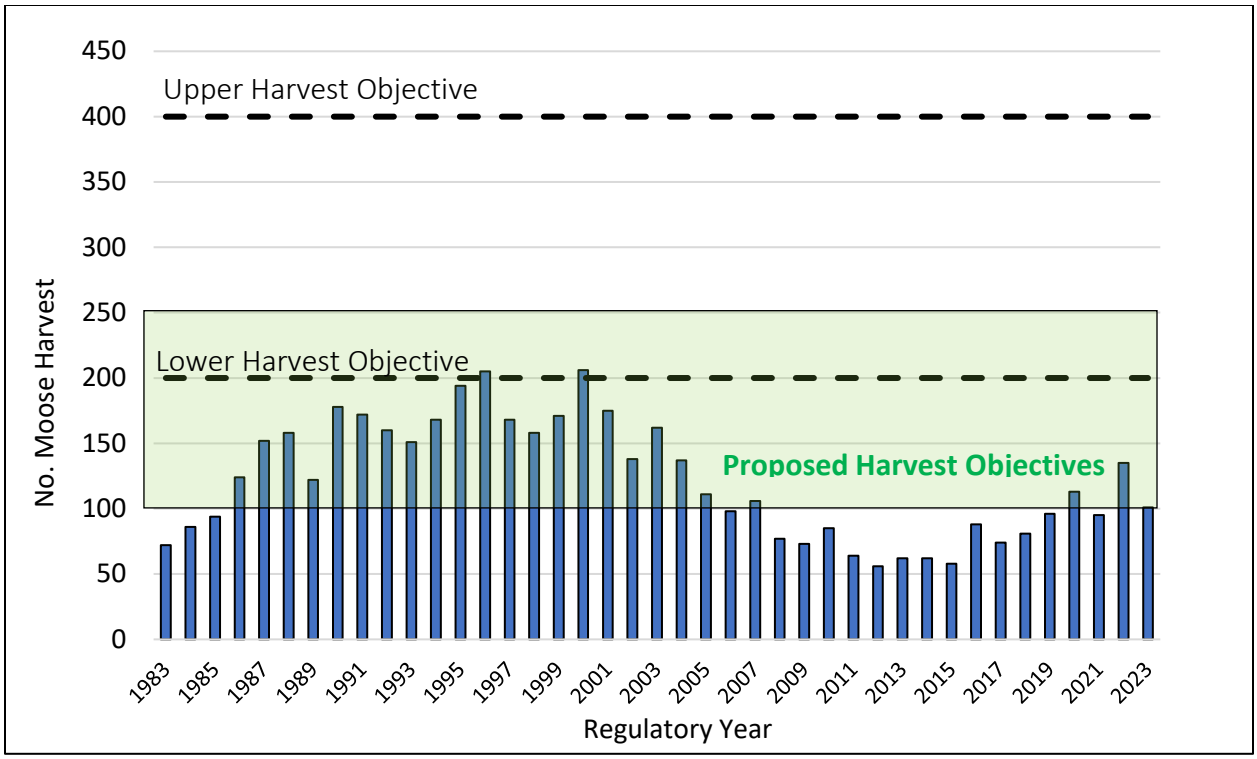
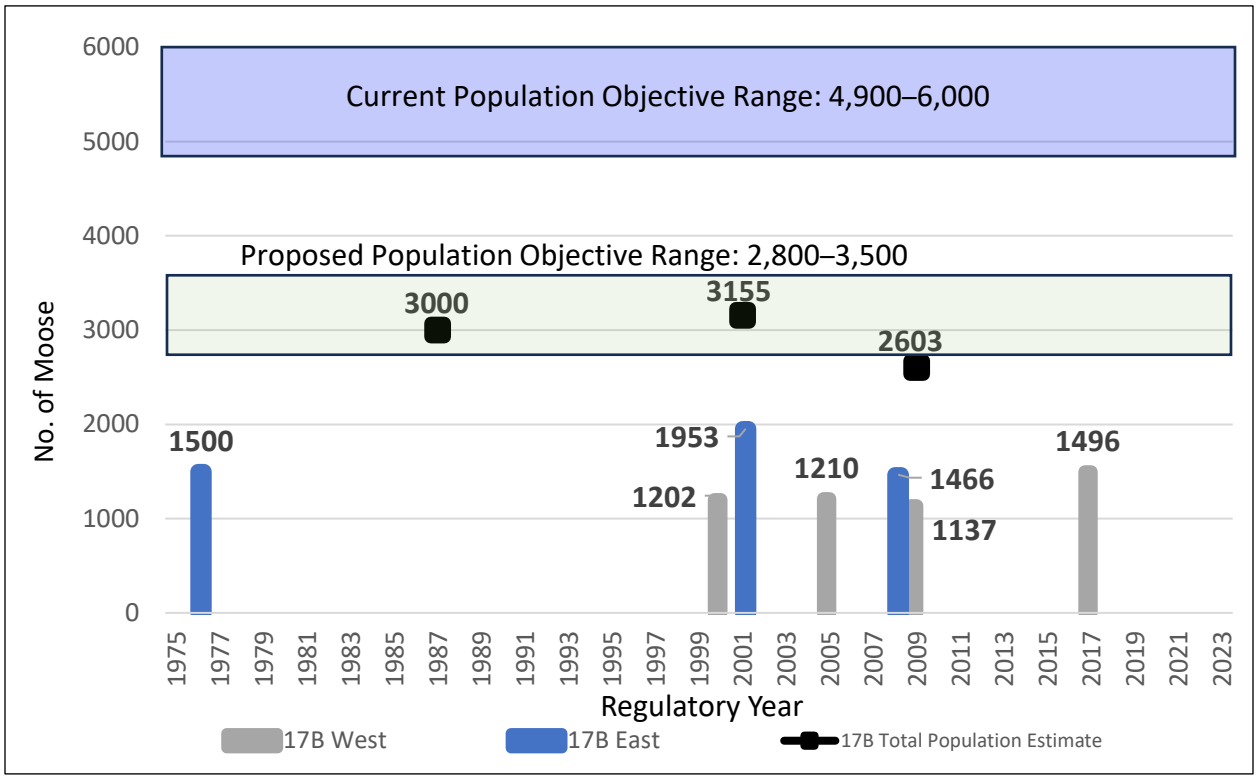


Figure 28-1. Harvest in Unit 17B from RY1983–2023 and the current and proposed harvest objectives.

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 in1987 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.

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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 mid-point of the IM population and harvest objectives for the moose population are achieved. This mid-point 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).

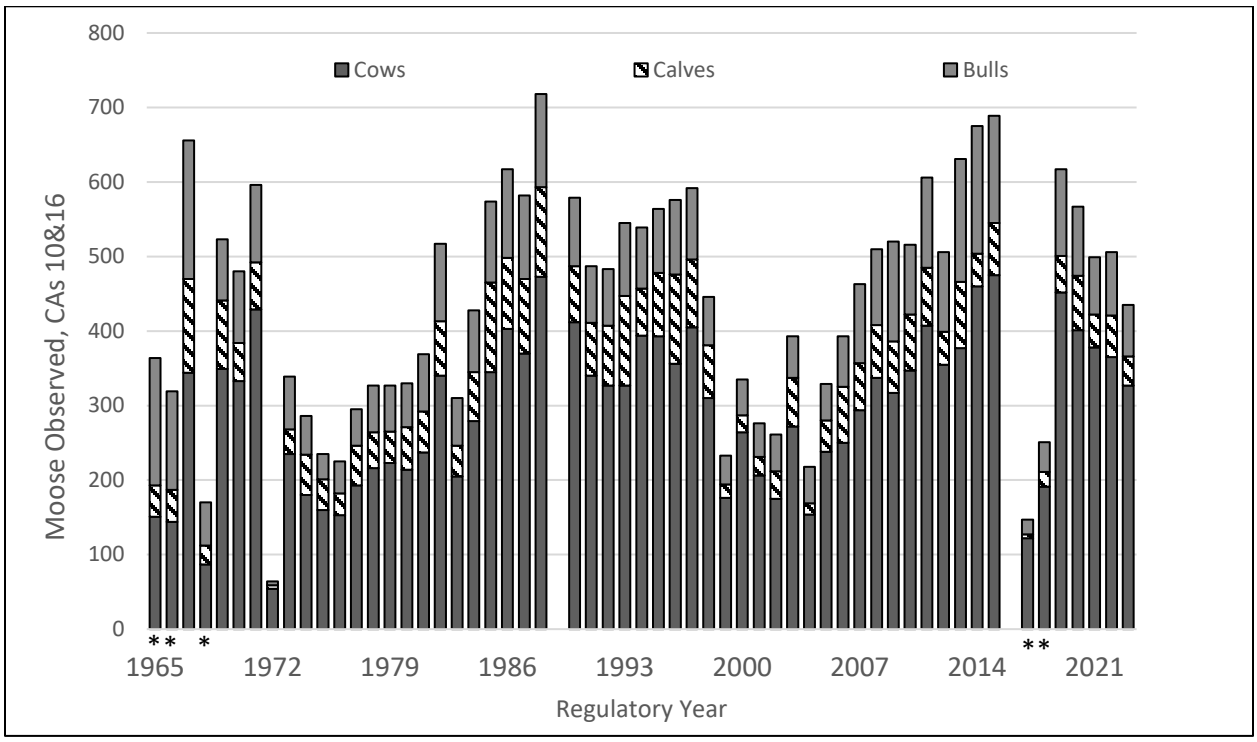

Figure 40-1. Minimum moose counts in Unit 13C trend count areas, RY1965–2023.
*Indicates years in which only one out of two count areas were surveyed.

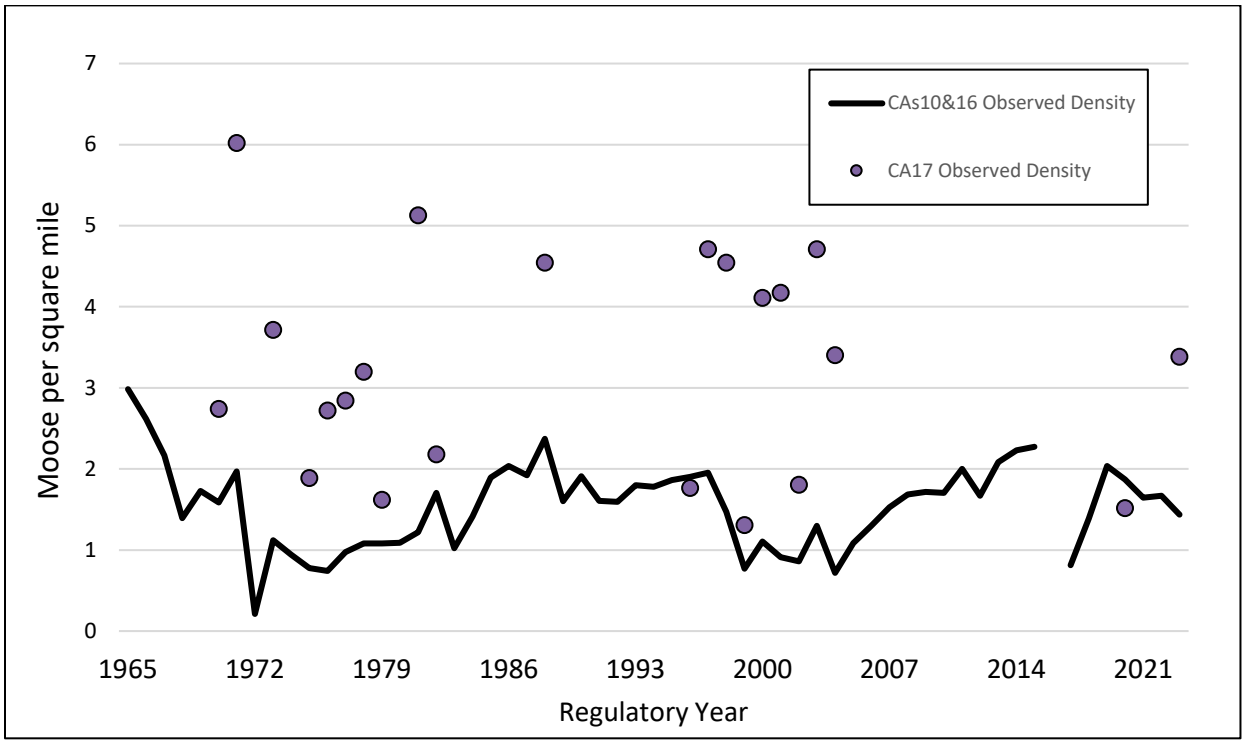

Figure 40-2. Observed moose densities in Unit 13C trend count areas, RY1965–2023.

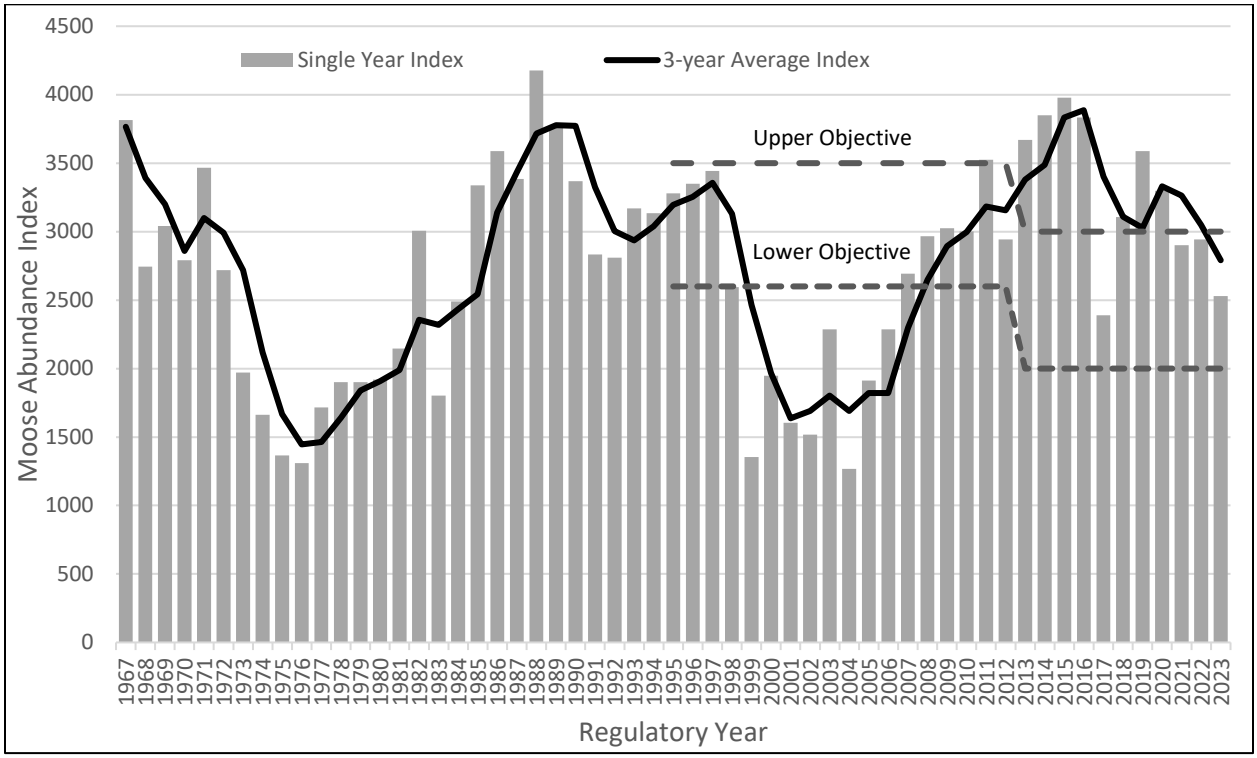

Figure 40-3. Moose abundance index and objectives in Unit 13C, RY1967–2023.

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.

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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) October 21–March 31 (subsistence hunt only)	No open season
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) October 21–March 31 (subsistence hunt only)	No open season
Up to 2 caribou every regulatory year by Tier I subsistence permit only; or	August 10–August 31 (subsistence hunt only) October 21–March 31 (subsistence hunt only)	No open season
Up to 2 caribou every regulatory year by Tier I subsistence permit only; or	September 1–September 20 (subsistence hunt only) October 21–March 31 (subsistence hunt only)	No open season
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 October 21–March 31	No open season

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.

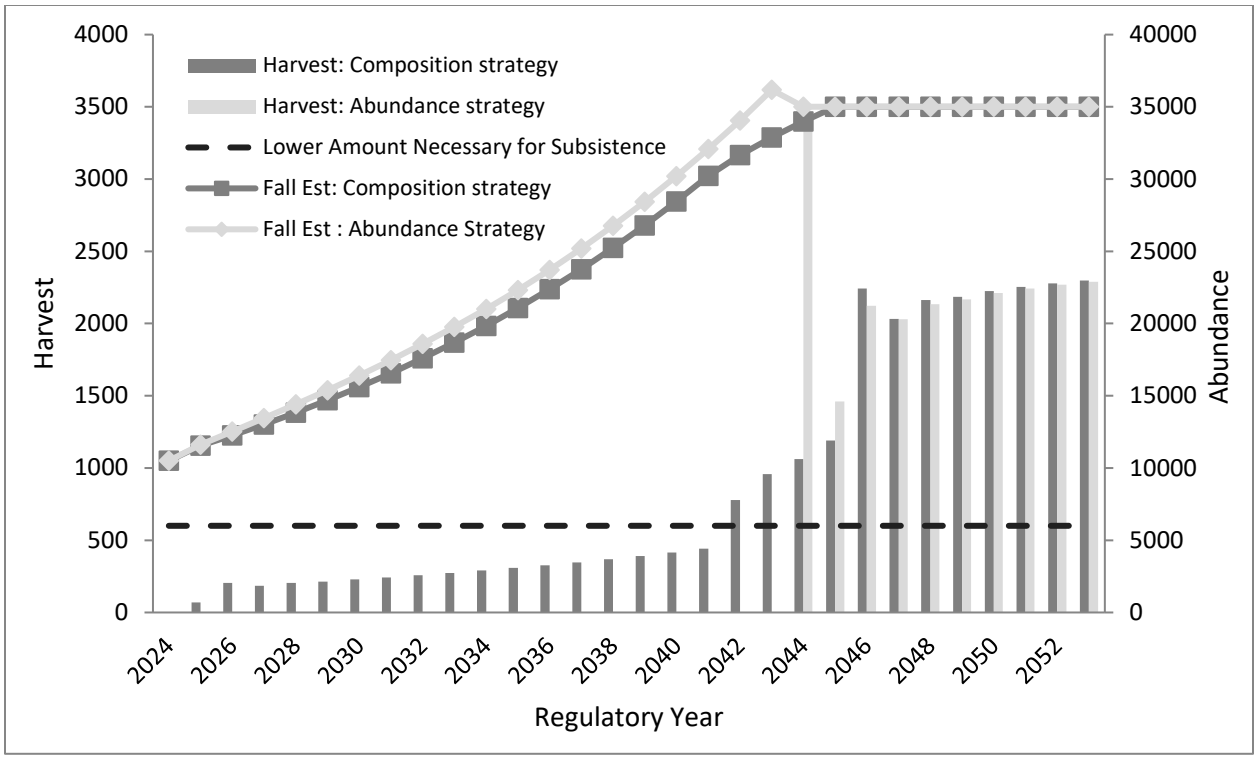

Figure 49-1. Illustrative model to compare composition strategy vs. abundance strategy for annual harvest of Nelchina caribou in Unit 13 and resulting estimated fall abundance, RY2024–2053

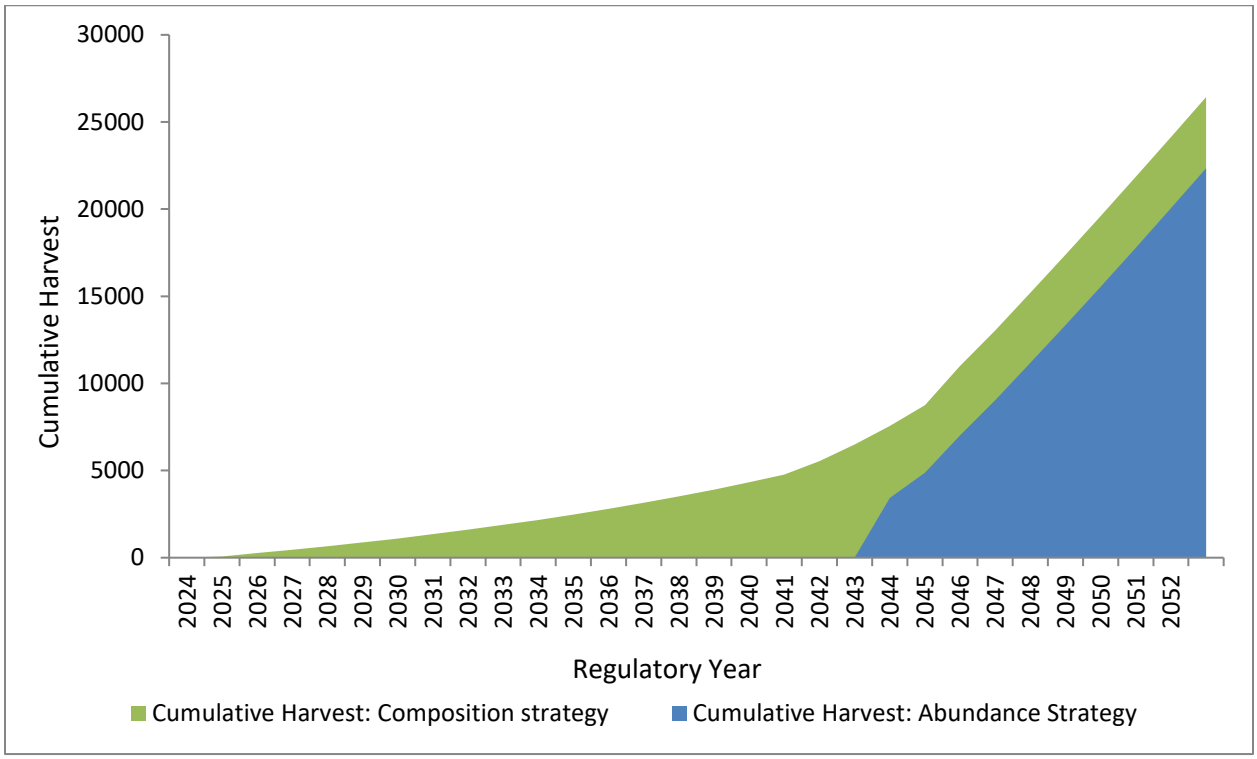

Figure 49-2. Cumulative harvest of Nelchina caribou in Unit 13 for a composition-based harvest strategy vs. an abundance-based harvest strategy, based on illustrative model, RY2024–2053.

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.

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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).

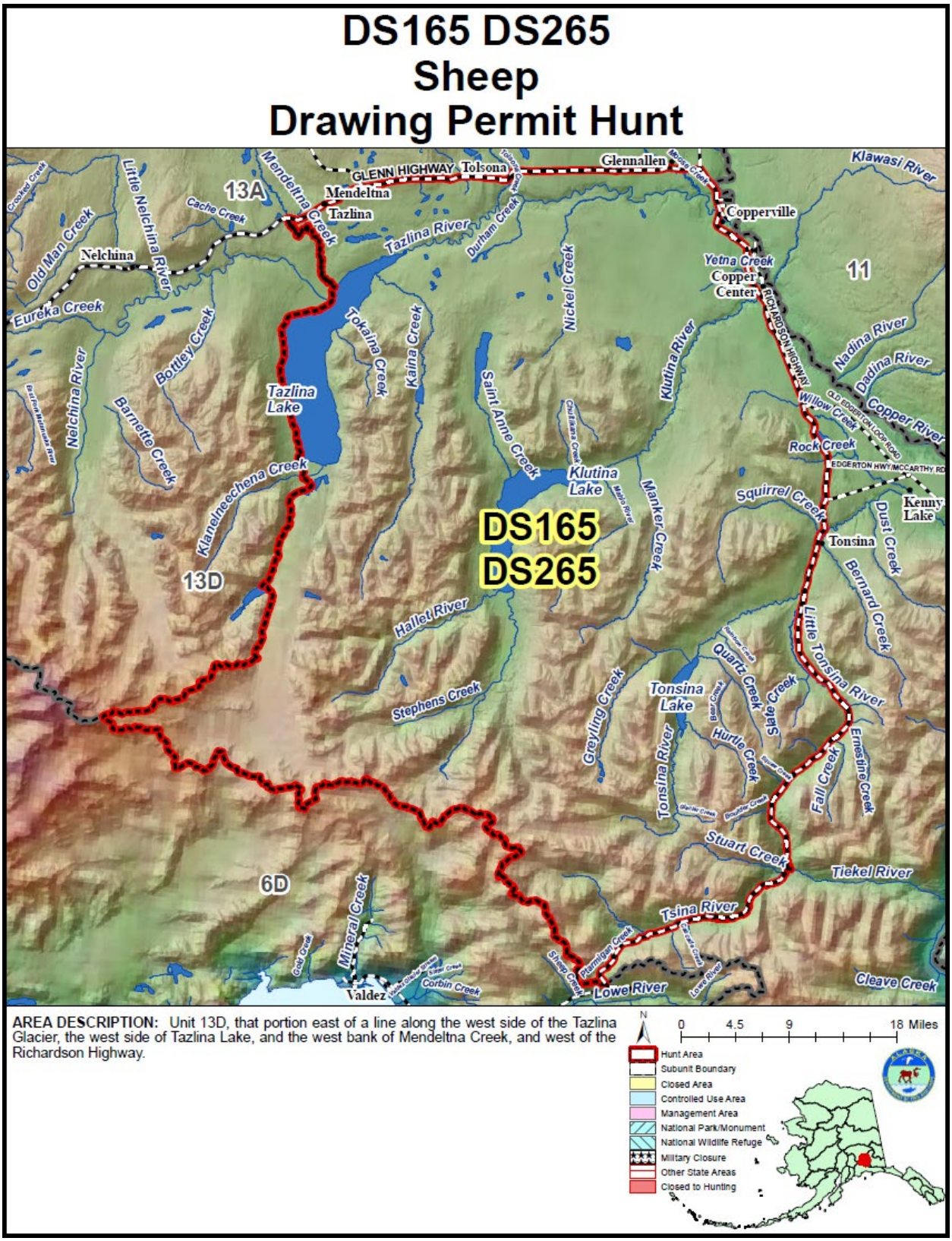

Figure 50-1. Hunt map for DS165 and DS265 in Unit 13D.

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.

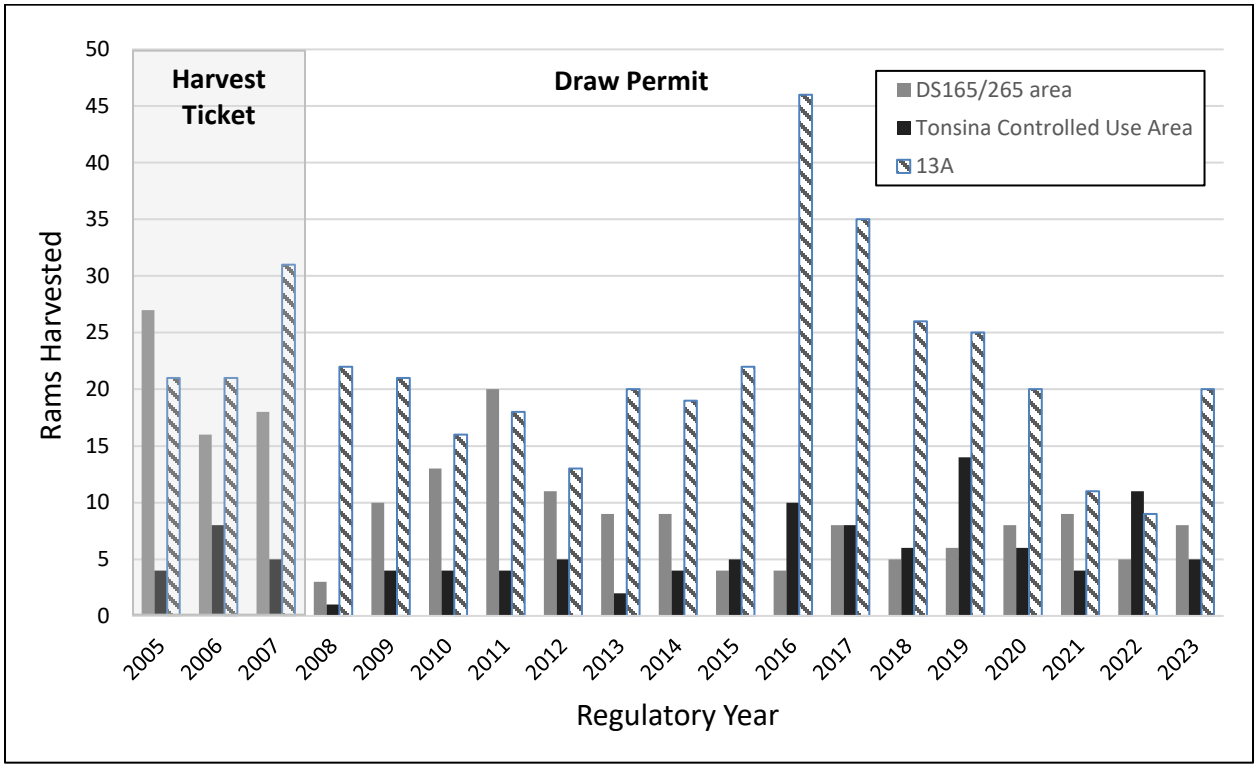

Figure 50-2. Harvest of Dall sheep rams in Unit 13A and portions of Unit 13D, RY2005–2023.

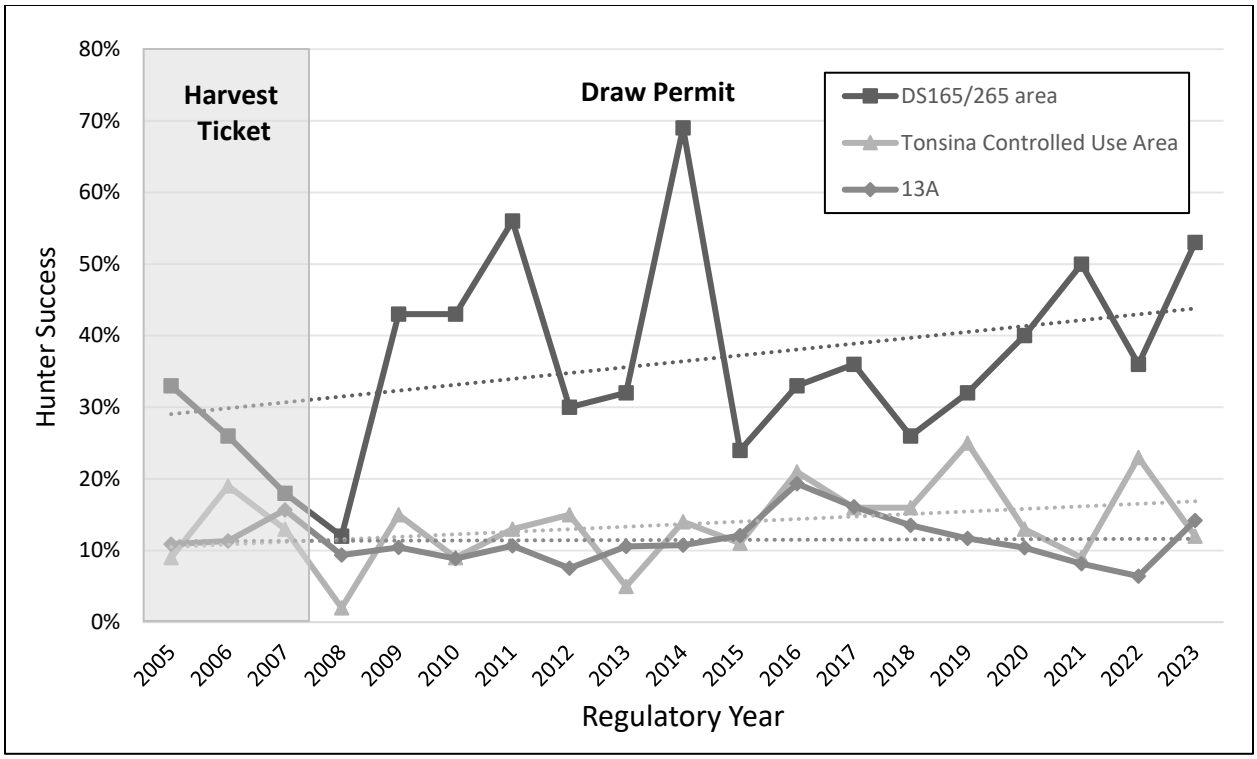

Figure 50-3. Dall sheep hunter success rates in Unit 13A and portions of Unit 13D, RY2005–2023.

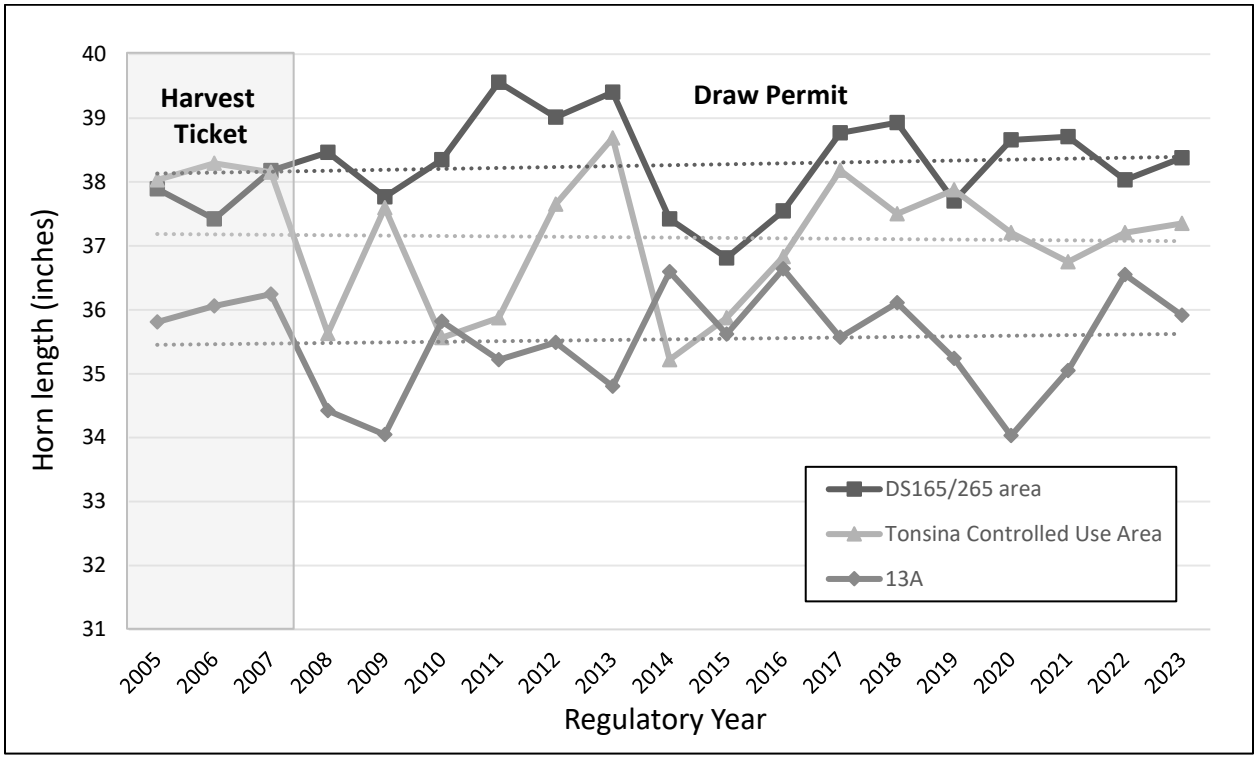

Figure 50-4. Average horn length of harvested rams in Unit 13A and portions of Unit 13D, RY2005–2023.

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.

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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.

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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

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 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.

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