

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS 39, 41, 42, 47, 68, and 69
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 39 – 5 AAC 92.108. Identified big game prey populations and objectives. Reduce moose abundance and harvest objectives for Unit 13B.

PROPOSED BY: Alaska Department of Fish and Game

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

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

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

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

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

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

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

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

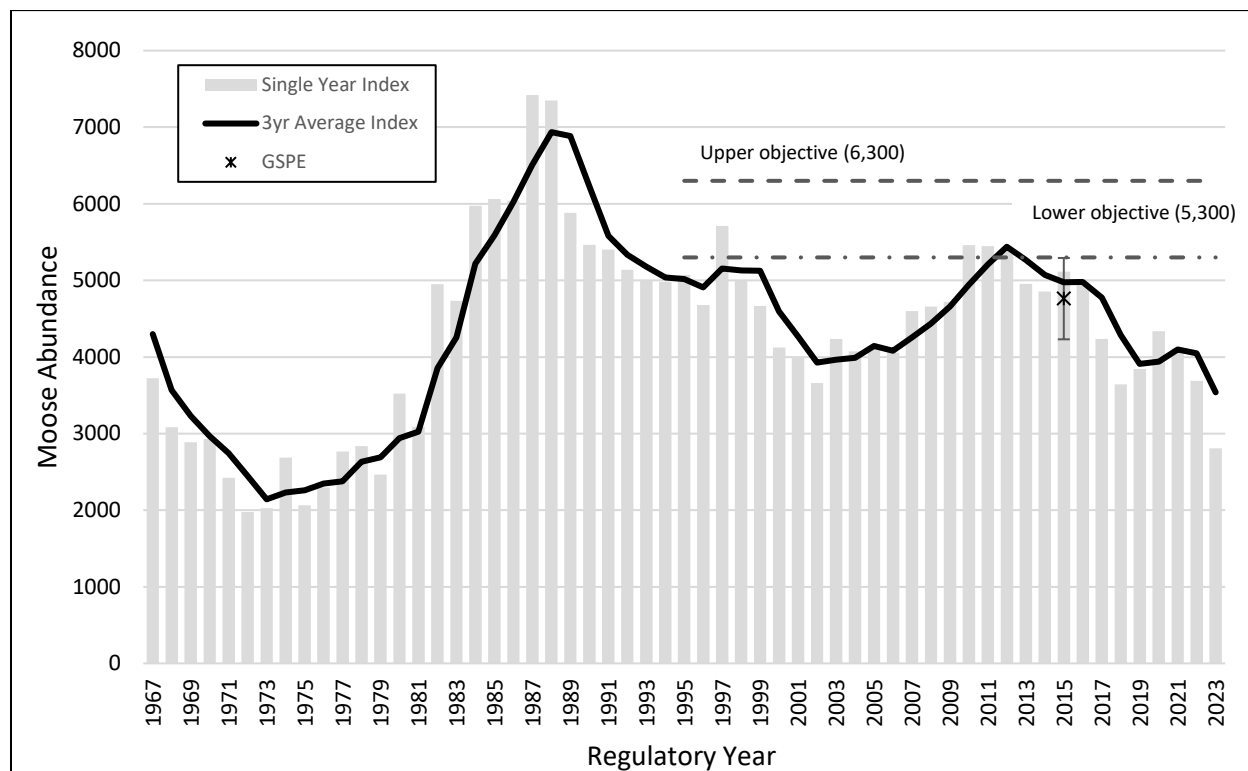


Figure 39-1. Moose abundance index, objectives, and GSPE survey results in Unit 13B, RY1967–2023.

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

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

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

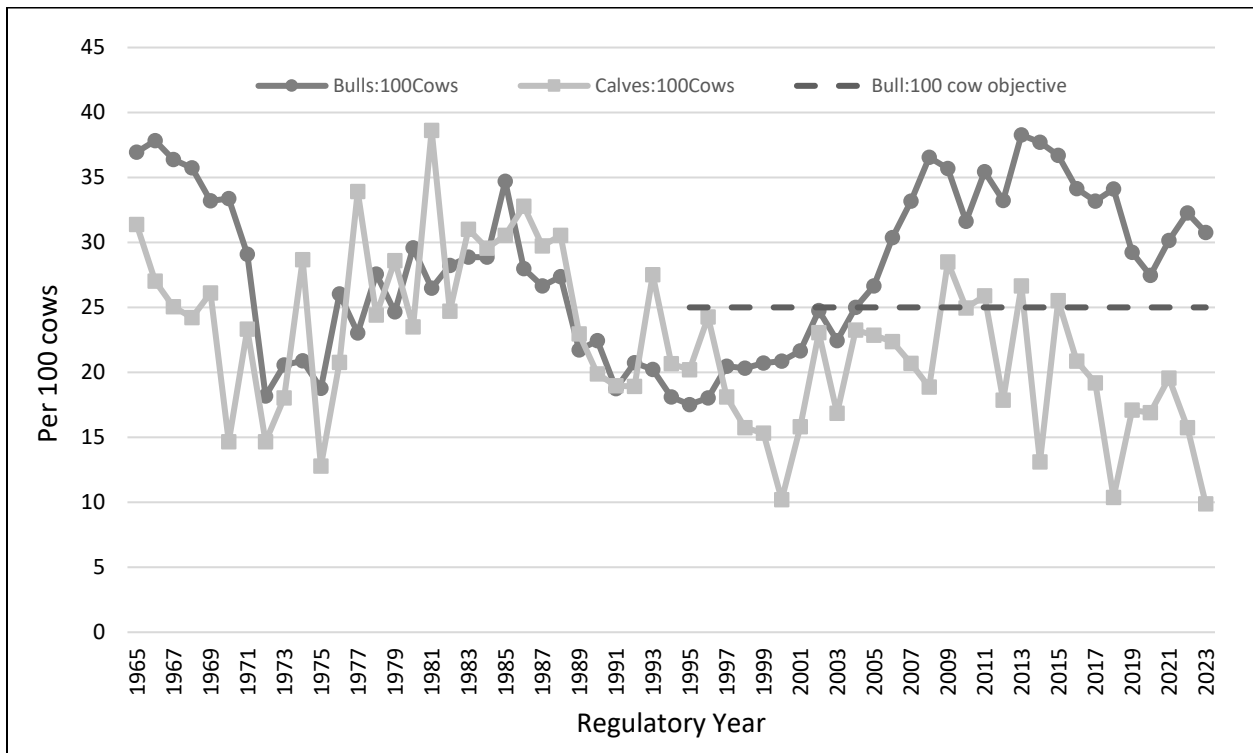


Figure 39-2. Moose composition ratios in Unit 13B, RY1967–2023.

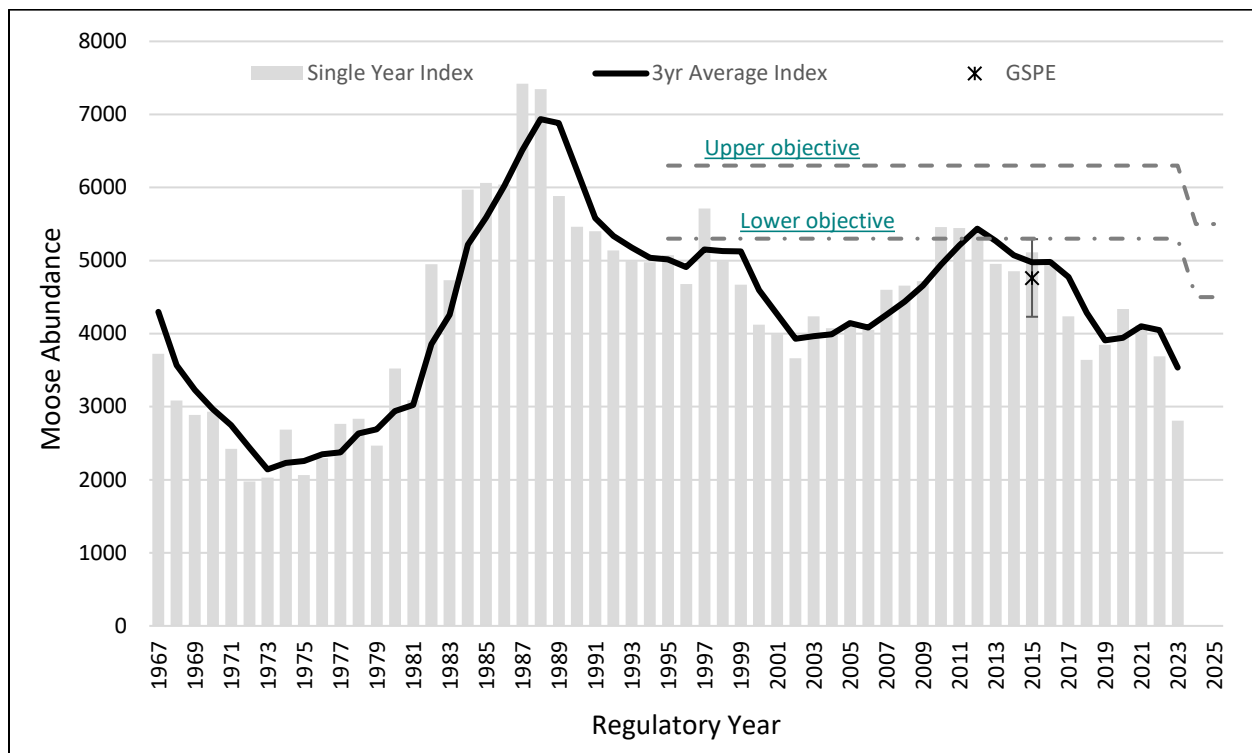


Figure 39-3. Moose abundance index and objectives in Unit 13B, RY1967–2023, and proposed objectives for RY2025.

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

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

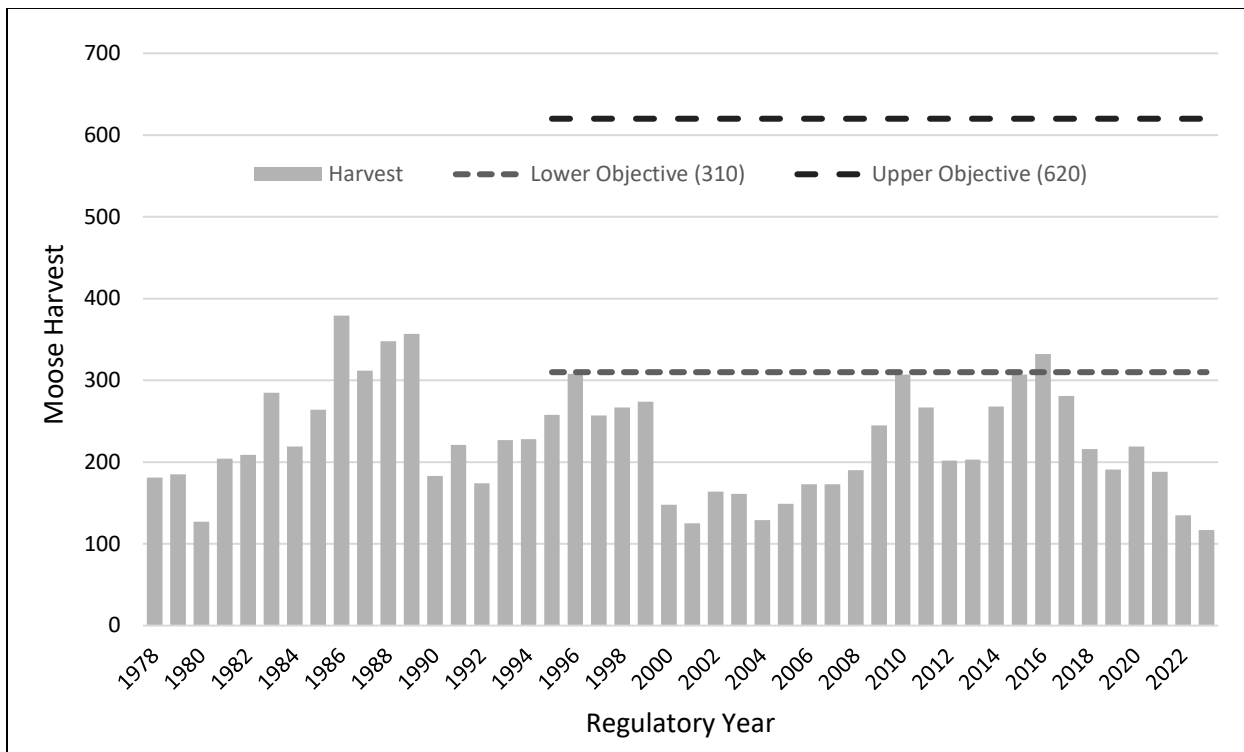


Figure 39-4. Moose harvest and objectives in Unit 13B, RY1967–2023.

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

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

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

PROPOSED BY: Alaska Department of Fish and Game

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

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

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

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

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

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

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

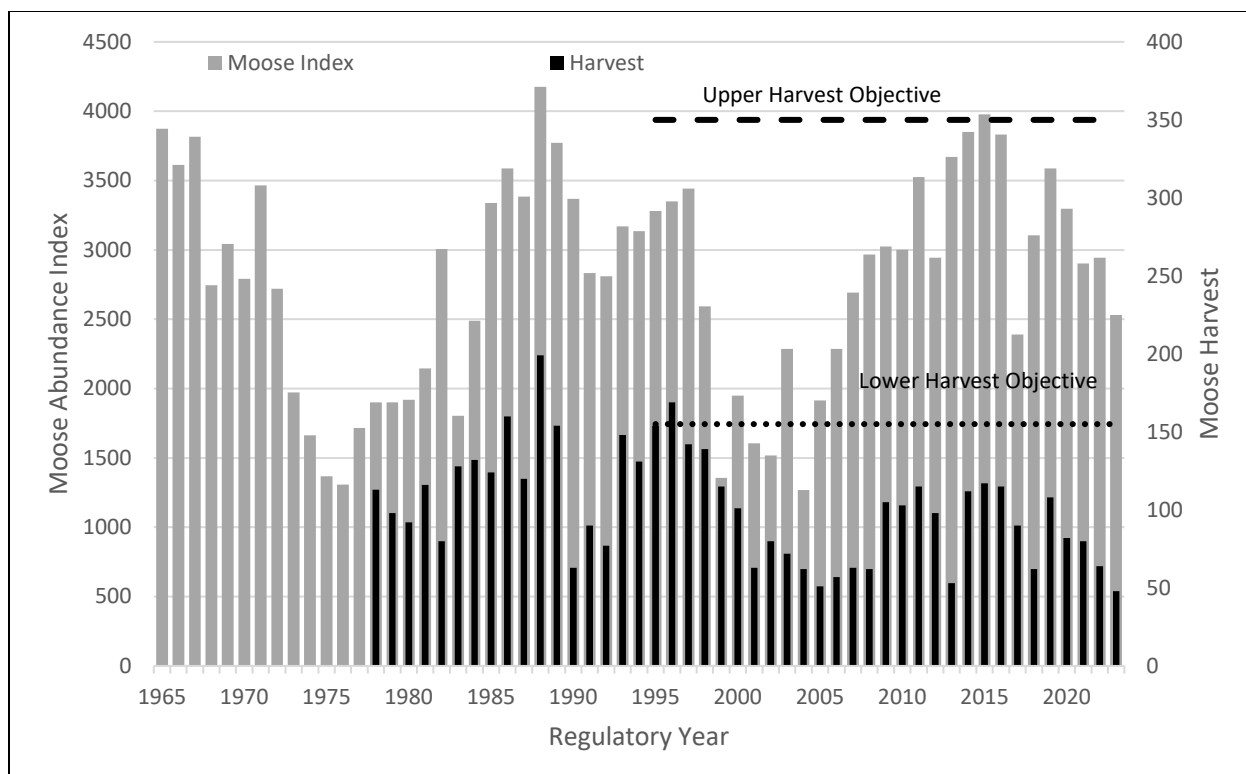


Figure 41-1. Moose harvest, harvest objectives, and abundance indices in Unit 13C, RY1965–2023.

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

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

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

Regulatory Year	Same-Day Airborne (SDA) Wolf Removal	Wolves Harvested Hunt/Trap/Snare	Total Wolves	% of wolves removed by SDA	Bull Moose Harvested ¹	Cow Moose Harvested ¹	3-year Average Moose Index
2001	not authorized	26	26	0%	63	0	1,636
2002	not authorized	18	18	0%	80	0	1,690
2003	not authorized	21	21	0%	72	0	1,803
2004	not authorized	11	11	0%	62	0	1,690
2005	33	17	50	66%	51	0	1,822
2006	0	11	11	0%	57	0	1,822
2007	7	21	28	25%	63	0	2,297
2008	3	14	17	18%	62	0	2,648
2009	4	11	15	27%	105	0	2,894
2010	20	25	45	44%	102	1	2,997
2011	6	8	14	43%	115	0	3,183
2012	Suspended	12	12	0%	97	1	3,156
2013	9	9	18	50%	52	1	3,379
2014	Suspended	20	20	0%	117	3	3,488
2015	Suspended	18	18	0%	116	1	3,833
2016	Suspended	25	25	0%	114	1	3,887
2017	Suspended	15	15	0%	90	0	3,400
2018	15	24	39	38%	60	2	3,110
2019	Suspended	13	13	0%	108	0	3,028
2020	Suspended	14	14	0%	82	0	3,331
2021	Suspended	3	3	0%	78	2	3,263
2022	Suspended	15	15	0%	61	3	3,047
2023	Suspended	32	32	0%	51	3 ²	2,792

¹ Includes ceremonial harvest.

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

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** adjusting the harvest objectives for moose in Unit 13C to objectives that are realistically achievable given biological and social constraints as well as historic harvest history for moose in the area. The current harvest objectives are not achievable under the existing hunt structure. Even if harvest objectives are achieved with these new objectives, wolf control would still be activated or suspended based on moose abundance in Unit 13C. If populations are approaching or exceeding the upper end of the objectives additional harvest will be necessary which could include additional

management tools such as extended seasons, any-bull opportunity, and antlerless opportunity to maintain the population within objectives and to take advantage of surplus moose created by IM.

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

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

PROPOSED BY: Alaska Department of Fish and Game

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

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

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

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

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

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

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

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

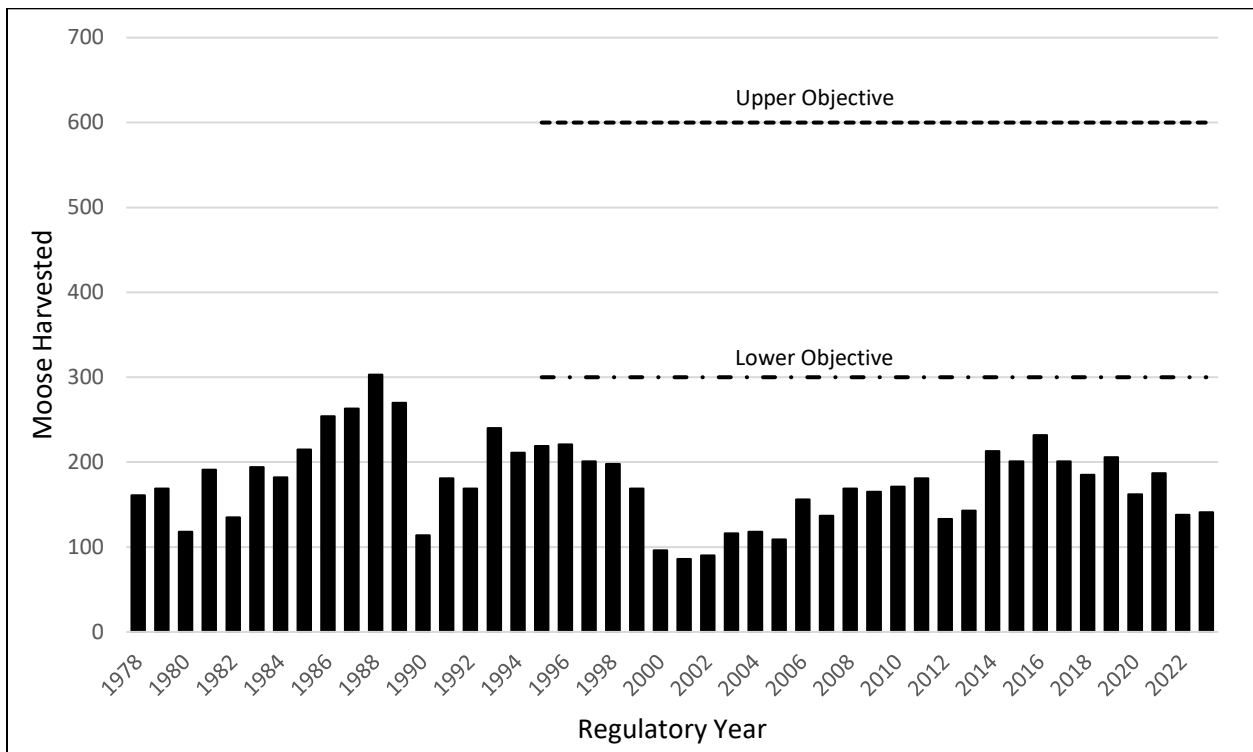


Figure 42-1. Moose harvest and objectives in Unit 13E, RY1978–2023.

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

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

Reg Year	Same-Day Airborne (SDA) Wolf Removal	Wolves Harvested Hunt/Trap/Snare	Total Wolves	% of wolves removed by SDA	Bull Moose Harvested ¹	Cow Moose Harvested ¹	3-year Average Moose Index
2001	-	66	66	0%	86	0	4,630
2002	-	42	42	0%	90	0	-
2003	43	27	70	61%	116	0	-
2004	26	23	49	53%	118	0	-
2005	9	13	22	41%	109	0	-
2006	13	5	18	72%	156	0	-
2007	14	6	20	70%	137	0	-
2008	35	14	49	71%	169	0	4,459
2009	10	14	24	42%	165	0	4,601
2010	45	3	48	94%	171	0	4,816
2011	25	14	39	64%	181	0	5,022
2012	Suspended	14	14	0%	133	0	5,476
2013	25	12	37	68%	142	1	5,791
2014	Suspended	9	9	0%	211	2	6,067
2015	Suspended	2	2	0%	200	1	6,081
2016	Suspended	14	14	0%	232	0	6,097
2017	Suspended	13	13	0%	201	0	6,213
2018	47	12	59	80%	185	0	6,258
2019	Suspended	23	23	0%	206	0	6,377
2020	Suspended	20	20	0%	162	0	6,334
2021	Suspended	9	9	0%	186	1	6,297
2022	Suspended	20	20	0%	138	0	5,935
2023	59	13	72	82%	140	2 ²	5,477

¹Includes ceremonial harvest.

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

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

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

PROPOSAL 47 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a late season, archery-only draw hunt for moose in a portion of Units 13B and 13E.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? This proposal would establish a new late season archery-only resident-only draw hunt within a 5-mile corridor on either side of the Denali Highway in Units 13B and 13E with season dates of September 25–30 and a bag limit of one bull moose.

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

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

- ***CM300*** - Copper Basin CSH Hunt:
 - The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.
 - CM300 permit holders not in possession of an any-bull locking tag have a bag limit of 1 moose with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least 1 side, with the same season dates.
 - Once the 100 any-bull allocation has been met, the bag limit is changed for all CSH participants by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines.
 - 350 CSH participants receive any-bull locking tags based on Tier II scoring criteria. Each community group must have 25 qualified individuals to successfully apply for any CSH program, and Copper Basin CSH groups are locked-in for a two-year commitment upon successful application.
 - Any eligible hunter within a group may act as a designated hunter for other members of the group.
 - Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
 - Meat of the forequarters, hindquarters, ribs, brisket, neck, and back bone must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.
 - The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the

Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.

- No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.
 - After the CSH hunt has ended, unsuccessful individual household members may then acquire state, or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- **GM000** - Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
 - **DM348** - Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
 - **DM335–339** - Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.
 - **FM1301** - Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In regulatory year (RY) 2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board to state hunting of moose and caribou.
 - **Federal Community Hunt:** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create a hunt to provide additional any-bull opportunity for resident hunters, but the available any-bulls in the hunt area may be harvested by the CM300 hunt prior to the season dates for this archery-only draw hunt. This could result in the draw hunt closing in at least a subunit by Emergency Order before it opens. This would negatively impact resident hunters who successfully draw this permit, if permits are offered. More likely, permits would not be offered for this hunt while the CM300 hunt is active.

BACKGROUND: There is a long history of any-bull harvest opportunity in Unit 13, with opportunity most recently available for up to 100 any-bulls in the CSH hunt (CM300), additional any-bull opportunity by very limited draw permit for residents in Unit 13D, and unlimited federal subsistence any-bull opportunity on federal subsistence hunting lands throughout Unit 13.

Since the implementation of the CSH hunt, any-bull quotas have been established annually for each subunit based on the bull-to-cow ratio observed in moose composition and minimum count surveys post-hunt. The objective for each subunit is to maintain a bull-to-cow ratio of 25 bulls per 100 cows post-hunt. Over time, bull-to-cow ratios in the most heavily hunted Unit 13 subunits have declined toward that objective, and as the post-hunt ratios approach that objective then the any-bull quota for that subunit is decreased for the following CM300 hunting season. In this way, the bull-to-cow ratios have generally stabilized around the objective in the most heavily hunted subunits; the any-bull quotas have also stabilized in these subunits over time.

Specific to Units 13B and 13E, there is a history of any-bull harvest opportunity being met by the CM300 hunt in these subunits. In recent years in Unit 13B, the any-bull quota has not been met by the CM300 hunt and bull-to-cow ratios post-hunt suggest that a small amount of any-bull opportunity could be offered for the proposed late-season any-bull draw hunt (Table 47-1). However, for Unit 13E the any-bull quota is generally met, and post-hunt surveys suggest that there is no additional any-bull harvest available for the proposed late-season archery-only any-bull draw hunt (Table 47-2).

Table 47-1. CSH any-bull harvest, federal bull harvest, and bull-to-cow ratios in Unit 13B, RY2009–2024.

Regulatory Year	CSH Any-bull Quota	CSH Any-bull Harvested	Any-Bull Early Closure Date	Federal Bulls Harvested	Post-hunt Bull: Cow Ratio
2009	25	23	No early closure	45	36
2010 ¹	-	-	-	62	-
2011	20	13	August 12 ²	48	35
2012	17	23	September 3	42	33
2013	26	23	August 16	37	38
2014	26	25	August 26	59	38
2015	30	35	September 14	58	37
2016	30	31	September 2	74	34
2017	30	34	September 8	55	33
2018	30	33	September 18	40	34
2019	34	34	No early closure	29	29
2020	34	24	No early closure	28	28
2021	30	27	No early closure	24	30
2022	30	20	No early closure	23	32
2023	30	21	No early closure	17	31
2024	32	TBD	TBD	TBD	TBD

¹ The CSH hunt was not offered in 2010 due to litigation.

² In 2011 there was a 5-mile corridor on either side of the Denali Highway in 13B with a quota of 6 “any-bulls” that closed on August 12, but the remainder of the unit remained open through September 20.

Table 47-2. CSH any-bull harvest, federal bull harvest, and bull-to-cow ratios in Unit 13E, RY2009–2024.

Regulatory Year	CSH Any-bull Quota	CSH Any-bull Harvested	Any-Bull Early Closure Date	Federal Bulls Harvested	Post-hunt Bull:Cow Ratio
2009	15	13	September 17	4	33
2010 ¹	-	-	-	1	-
2011	15	20	No early closure	7	31
2012	13	16	September 13	4	32
2013	21	12	August 16	4	34
2014	21	21	August 15	4	41
2015	26	26	September 9	7	25
2016	26	38	August 24	2	40
2017	26	29	August 27	6	23
2018	26	25	No early closure	2	27
2019	25	27	September 8	1	24
2020	25	27	August 30	2	26
2021	25	28	September 8	2	23
2022	23	21	August 30	2	28
2023	24	24	No early closure	3	26
2024	24	TBD	TBD	TBD	TBD

¹ The CSH hunt was not offered in 2010 due to litigation.

Over the past decade, an average of 4 moose are harvested annually using archery equipment in Unit 13 as a whole. An average of one bull per year is harvested with archery equipment in Unit 13E and only three total bulls have been harvested with archery equipment in Unit 13B over the past 10 years. The late season dates and accessible nature of this hunt are likely to attract significant interest. Although archery moose hunting may be more difficult than moose hunting with a firearm, the proposed season dates during late September occur during the rut, when bull moose are very susceptible to calls and therefore are more vulnerable to close-range harvest. This hunt would likely increase any-bull harvest in any area where it is implemented.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means as well as the allocation of moose harvest. Since 1991, the lower end of the moose population and harvest objectives in Unit 13B have been met only 4 times — the department submitted a proposal to adjust the objectives to a more biologically appropriate level (Proposal 39). An additional department proposal seeks to reduce the moose harvest objective in Unit 13E (Proposal 42).

This proposal might provide additional opportunity if the any-bull quotas for Units 13B and/or 13E are not filled by the Copper Basin Community Subsistence Harvest Hunt (CM300) in a given year but, more likely, permits would not be offered for this draw hunt for Unit 13E in years that the CM300 hunt is offered based on limited to no harvestable surplus of any-bull moose remaining after the CM300 season has closed. Permits could be made available for Unit 13B based on the history of any-bull harvest opportunity remaining after the existing August/September hunting

seasons. If CM300 hunt administration remains unchanged then late-season draw permits may need to be closed by emergency order in years when CM300 any-bull quotas are met for a given subunit. If late-season draw permits result in a decline in 13B bull-to-cow ratios infuture years, this could result in decreased any-bull quotas for the CM300 hunt. Adoption of this proposal will add complexity to the allocation and implementation of the hunt structure in these subunits, and the board will need to create findings to ensure the department is able to implement the complex allocation as desired by the board. As part of this, the board may wish to consider whether adding this additional non-subsistence opportunity would reduce the opportunity provided for subsistence, and if so, whether reasonable opportunity for subsistence would still be provided.

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

PROPOSAL 68 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the bag limit for the Unit 16B fall Tier II hunts to 1 bull moose.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would change the fall Tier II moose hunts (TM565/567/569; Figure 68-1) from a bag limit of 1 bull moose with spike or fork antlers or 50-inch antlers or antlers with 3 or more brown tines on at least one side to a bag limit of 1 bull moose (any-bull).

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations for Unit 16B can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence & General Hunts)	Nonresident Open Season
If the harvestable portion is 199 moose or less; up to 400 total Tier II permits may be issued;		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by Tier II subsistence hunting permit only; or	Aug. 20–Sept. 30 (Subsistence hunt only)	

1 bull by Tier II subsistence hunting permit only; or if the harvestable portion is greater than 199 moose, but less than 241 moose;

Dec. 15–Mar. 31
(Subsistence hunt only)

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or

Sept. 1–Sept. 20

1 bull by Tier II subsistence hunting permit only; up to 260 permits may be issued; or

Dec. 15–Mar. 31
(Subsistence hunt only)

If the harvestable portion is greater than 240 moose:

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or

Aug. 20–Sept.25

1 bull by drawing permit only; up to 75 percent of the combined drawing permits in the area may be issued to non-youth hunters; up to 600 permits may be issued; provided that the harvestable portion is greater than 310 moose; or

Aug. 20–Sept.25
(General hunt only)

1 bull by youth hunt drawing permit only; up to 25 percent of the combined drawing permits in the area may be issued to youth hunters; provided that the harvestable portion is greater than 310 moose; or

Aug. 20–Sept.25
Nov. 15–Jan. 31
(General hunt only)

1 bull by registration permit only; or

Dec. 15–Last Day of Feb.

1 bull by drawing permit only;
up to 500 permits may be issued; or Dec. 15–Last Day of Feb.

1 moose by Tier II subsistence
hunting permit only; up to 260 permits may be issued; or Dec. 15–Mar. 31
(Subsistence hunt only)

NONRESIDENT HUNTERS

1 bull with spike-fork antlers
or 50-inch antlers or antlers
with 3 or more brow tines on at
least one side; if the
harvestable portion is greater
than 240 moose Aug. 20–Sept. 25

Moose in Unit 16B have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,500–7,500 moose and 310–600, respectively.

There are three defined moose populations in Unit 16B with separate customary and traditional (C&T) use findings and associated amounts reasonably necessary for subsistence (ANS). There is a positive customary and traditional (C&T) use finding for moose in Unit 16B in the Redoubt Bay drainages with an amount reasonably necessary for subsistence (ANS) of 10 moose. There is a positive C&T use finding for moose in Unit 16B in that portion south of the Beluga River and north of Redoubt Bay with an ANS of 29–37 moose. There is a positive C&T use finding for moose in Unit 16B in that portion north of the Beluga River with an ANS of 160–180 moose.

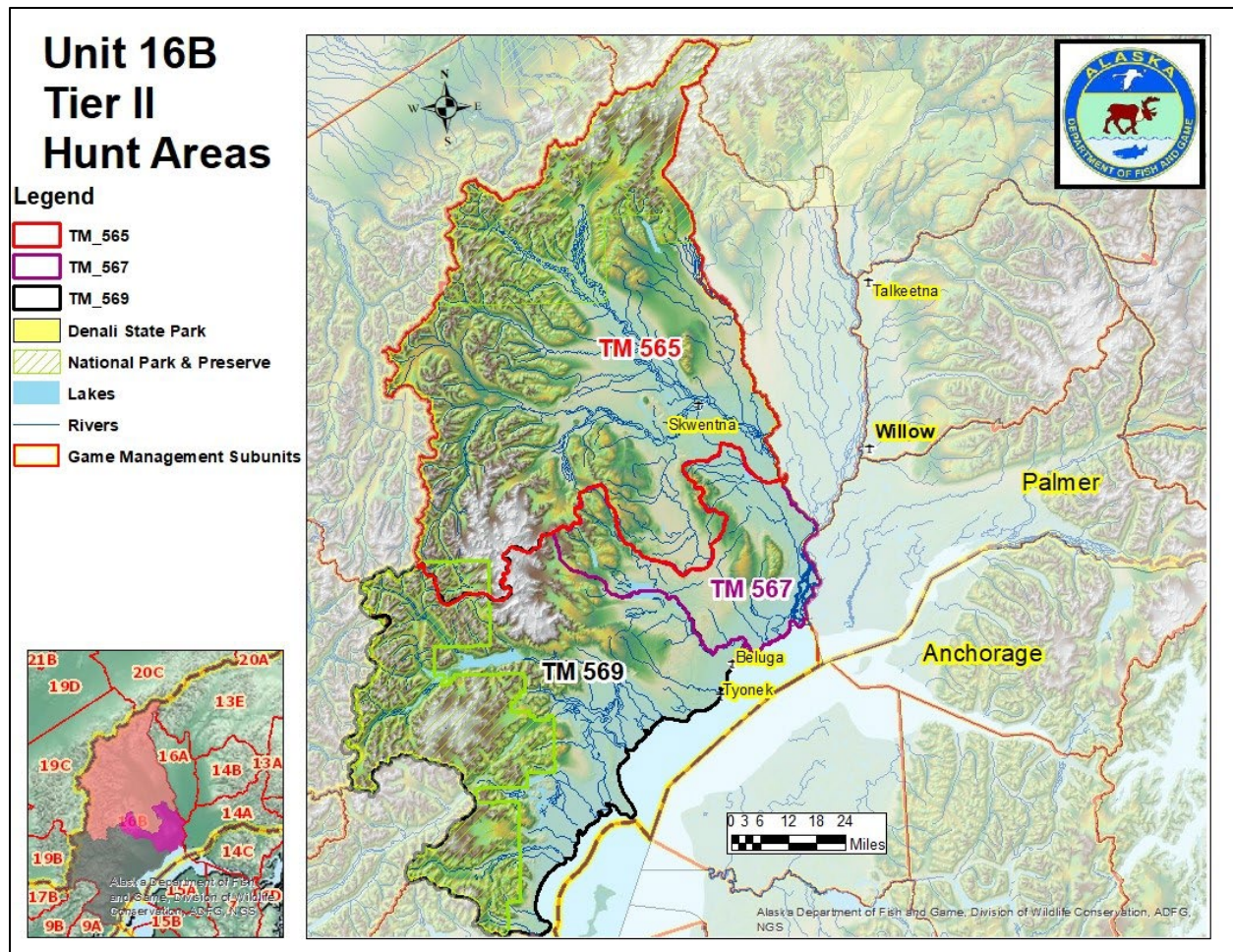


Figure 68-1. Map of the 3 Unit 16B Tier II moose hunts.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal, if adopted, would change the fall season bag limit of the Tier II moose hunts from 1 bull with spike or fork antlers, 50-inch antlers, or antlers with 3 or more brow tines on at least one side to 1 bull moose. This change would increase subsistence opportunity during the Tier II hunts where, by definition, full subsistence opportunity cannot be provided. This would likely increase catch per unit effort and increase success rates of fall Tier II hunters. If success rates increased significantly permit levels may have to be adjusted to avoid overharvest.

BACKGROUND: Moose populations in Unit 16B have been in decline since the recent high of 10,084 moose estimated in 2018. The unit experienced a heavy snow event in the winter of RY19 resulting in significant winter kill and leading to the population declining to the 2022 estimate from a geospatial population estimator (GSPE) of 6,789 moose (Figure 68-2). This estimate of 6,789 moose is near the low end of the population objective of 6,500–7,500 moose for all of Unit 16B, but when coupled with the estimates of 9.8 calves per 100 cows in Unit 16B-North, 11.7 calves per 100 cows in Unit 16B-Middle, and 6.4 calves per 100 cows in Unit 16B-South, it indicates a population that may continue to decline.

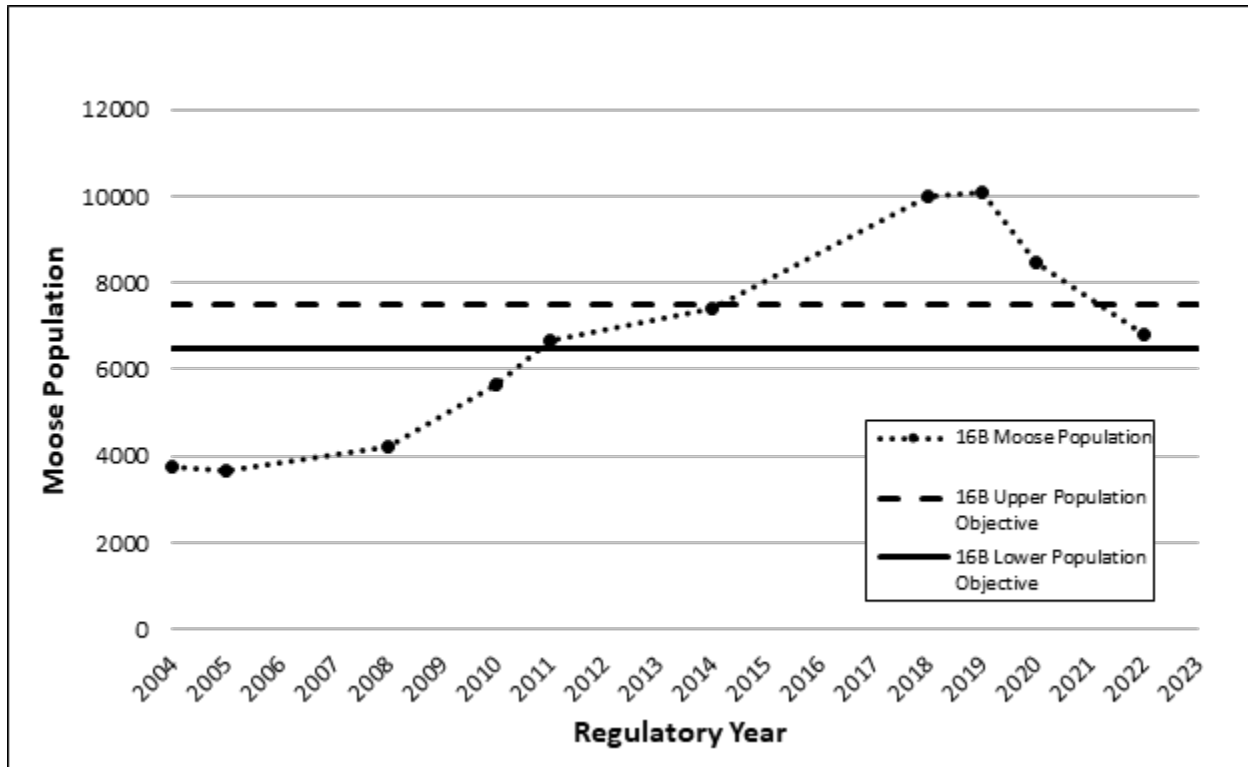


Figure 68-2. Unit 16B Moose population estimate with population objective, RY2004–2023.

Unit 16B moose are managed such that if the harvestable surplus of bulls is less than 199 moose, the season changes to Tier II only with up to 400 permits issued with a fall hunt with a bag limit of 1 bull moose with spike fork antlers, 50-inch antlers, or antlers with 3 or more brow tines on at least one side from August 20–September 30 and a winter hunt with a bag limit of 1 bull moose from December 15–March 31. Since the heavy snow year in the winter of RY19 and the subsequent die off, harvest has been declining (Figure 68-3). Harvest objectives have not been met since RY20 although general season harvest has remained relatively stable over the last 4 years, ranging from 141 moose harvested in RY20 to 119 in RY23 and an average of 127 moose. The Tier II winter season bag limit is 1 bull without antler restrictions, harvest has also remained stable over the last 5 years ranging from 105 moose to 62 moose harvested with an average of 86 and a success rate of 47%. Total harvest for 2022 was 275 moose and 2023 was 206. The harvest has exceeded the ANS of 200 moose for the last 10 years.

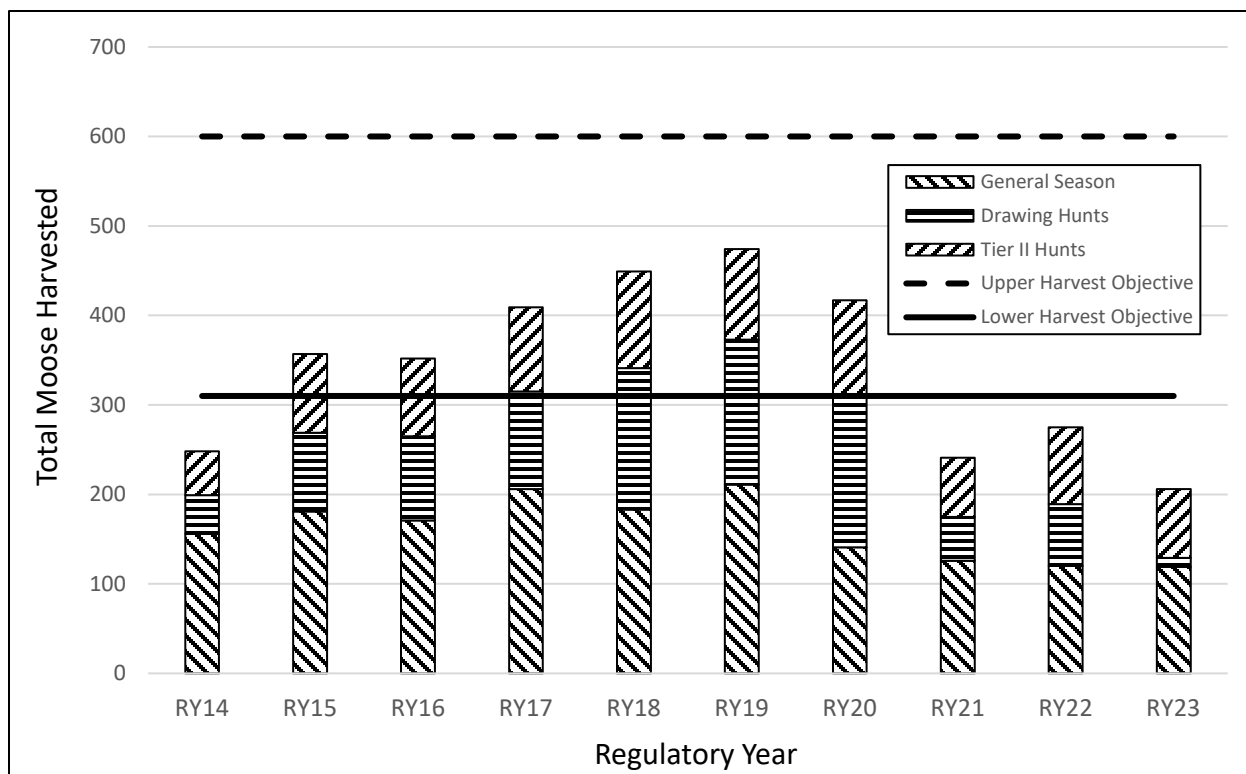


Figure 68-3. Unit 16B Moose harvest from general season, drawing, and Tier II hunts, RY2014–2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because in the event the fall Tier II seasons are held, hunting opportunity would already have been restricted by removing the general season hunt. The department would still be able to manage harvest by dictating the number of permits issued if necessary. It is likely additional moose would be harvested in the fall under an any bull bag limit versus a bag limit with antler restrictions, but overall, harvest would not likely change significantly due to already having an any bull season in the winter and there would not likely be a biological impact.

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

PROPOSAL 69 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Shorten the season for the Tier II moose hunts in Unit 16B.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would shorten the Tier II hunt seasons in Unit 16B, TM565, TM567, and TM569, from December 15–March 31 to December 15–February 28.

WHAT ARE THE CURRENT REGULATIONS? The current moose hunting regulations for Unit 16B can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Units and Bag Limits	Resident Open Season (Subsistence & General Hunts)	Nonresident Open Season
If the harvestable portion is 199 moose or less; up to 400 total Tier II permits may be issued;		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by Tier II subsistence hunting permit only; or	Aug. 20–Sept. 30 (Subsistence hunt only)	
1 bull by Tier II subsistence hunting permit only; or if the harvestable portion is greater than 199 moose, but less than 241 moose;	Dec. 15–Mar. 31 (Subsistence hunt only)	
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or	Sept. 1–Sept. 20	
1 bull by Tier II subsistence hunting permit only; up to 260 permits may be issued; or	Dec. 15–Mar. 31 (Subsistence hunt only)	
If the harvestable portion is greater than 240 moose:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; or	Aug. 20–Sept. 25	
1 bull by drawing permit only; up to 75 percent of the combined drawing permits in the area may be issued to non-	Aug. 20–Sept. 25 (General hunt only)	

youth hunters; up to 600 permits may be issued; provided that the harvestable portion is greater than 310 moose; or

1 bull by youth hunt drawing permit only; up to 25 percent of the combined drawing permits in the area may be issued to youth hunters; provided that the harvestable portion is greater than 310 moose; or

Aug. 20–Sept. 25
Nov. 15—Jan. 31
(General hunt only)

1 bull by registration permit only; or

Dec. 15–Last Day of Feb.

1 bull by drawing permit only; up to 500 permits may be issued; or

Dec. 15–Last Day of Feb.

1 moose by Tier II subsistence hunting permit only; up to 260 permits may be issued; or

Dec. 15–Mar. 31
(Subsistence hunt only)

NONRESIDENT HUNTERS

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side; if the harvestable portion is greater than 240 moose

Aug. 20–Sept. 25

Moose in Unit 16B have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,500–7,500 moose and 310–600, respectively.

There are three defined moose populations in Unit 16B with separate customary and traditional (C&T) use findings and associated amounts reasonably necessary for subsistence (ANS). There is a positive customary and traditional (C&T) use finding for moose in Unit 16B in the Redoubt Bay drainages with an amount reasonably necessary for subsistence (ANS) of 10 moose. There is a positive C&T use finding for moose in Unit 16B in that portion south of the Beluga River and north of Redoubt Bay with an ANS of 29–37 moose. There is also a positive C&T use finding for

moose in Unit 16B in that portion north of the Beluga River with an ANS of 160–180 moose which brings the total ANS for Unit 16B to 199–227 moose (Figure 69-1).

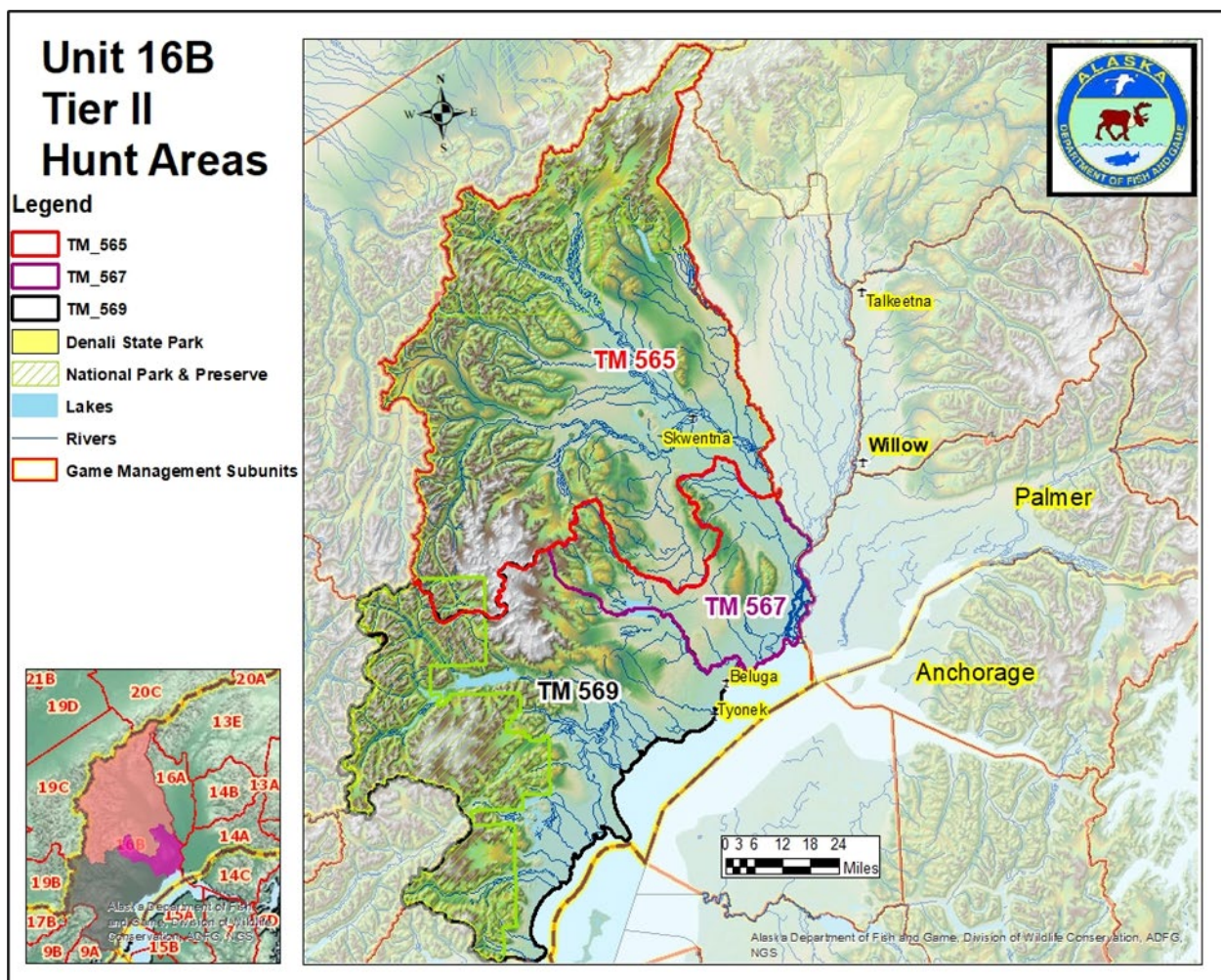


Figure 69-3. Map of Unit 16B Tier II moose hunts.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal, if adopted, would shorten the Tier II hunting seasons in Unit 16B by 31 days from December 15–March 31 to December 15–February 28. This would remove the last 31 days of the hunting season (March) when good snow conditions and long daylight lead to when the largest proportion of moose are taken within this hunt. The decrease in opportunity could lead to a decline in moose harvest.

BACKGROUND: Moose populations in Unit 16B have been in decline since the recent high of 10,084 moose estimated in 2018. The unit experienced a heavy snow event in the winter of RY19 causing a significant over winter mortality event and resulting in a population decline to 6,789 moose in 2022 (Figure 69-2). This estimate of 6,789 moose is still within the population objective of 6,500-7,500 moose for all of Unit 16B, but when coupled with the estimates of 9.8 calves per 100 cows in Unit 16B-North, 11.7 calves per 100 cows in Unit 16B-Middle, and 6.4 calves per 100 cows in Unit 16B-South, it indicates a population that may continue to decline.

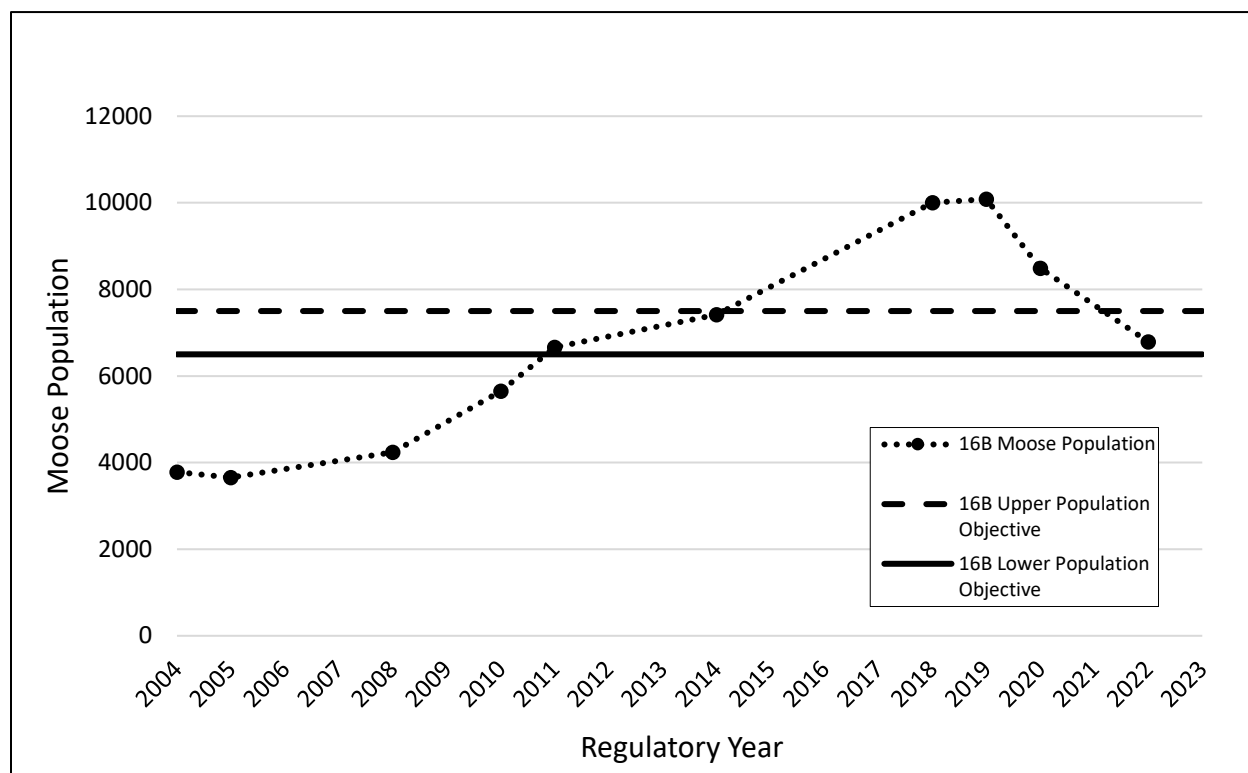


Figure 69-2. Unit 16B Moose population estimate with population objective, RY 2004–2023.

The Tier II hunting seasons for TM565, TM567, and TM569 is currently held over a 3.5-month period from December 15–March 31 (Figure 69-3). The majority of the hunting effort is conducted via snowmachine once the rivers are frozen over and there is sufficient snow cover to travel. Harvest for these hunts increases as the season progresses, 43% of the moose are taken in March versus 24% in February, 20% in January, and 13% in December (Figure 69-4). This is primarily due to increasing daylight hours, improving weather in the spring, and moose congregating on the river corridors as snow depth in the unit increases. While the largest portion of harvest occurs in March, if that month was removed, most hunters would likely shift their focus earlier in the year and there would not be a significant decrease in harvest.

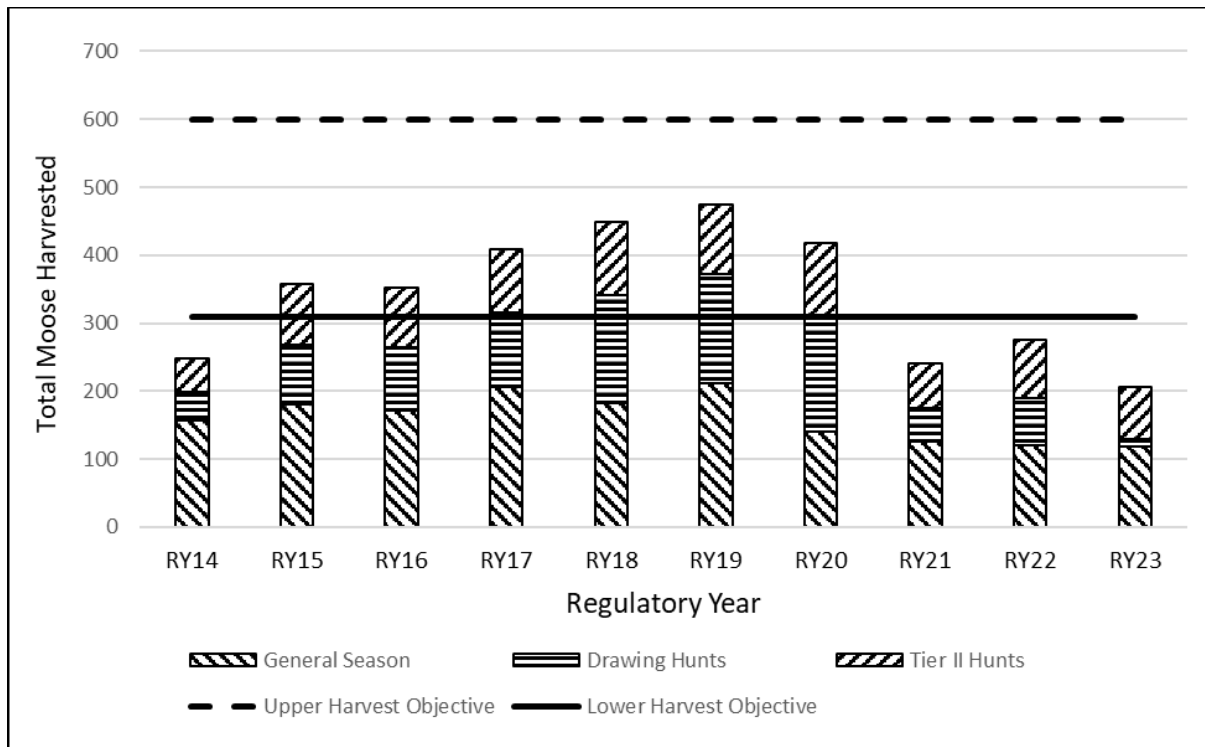


Figure 69-3. Moose harvest in Unit 16B, RY14–23.

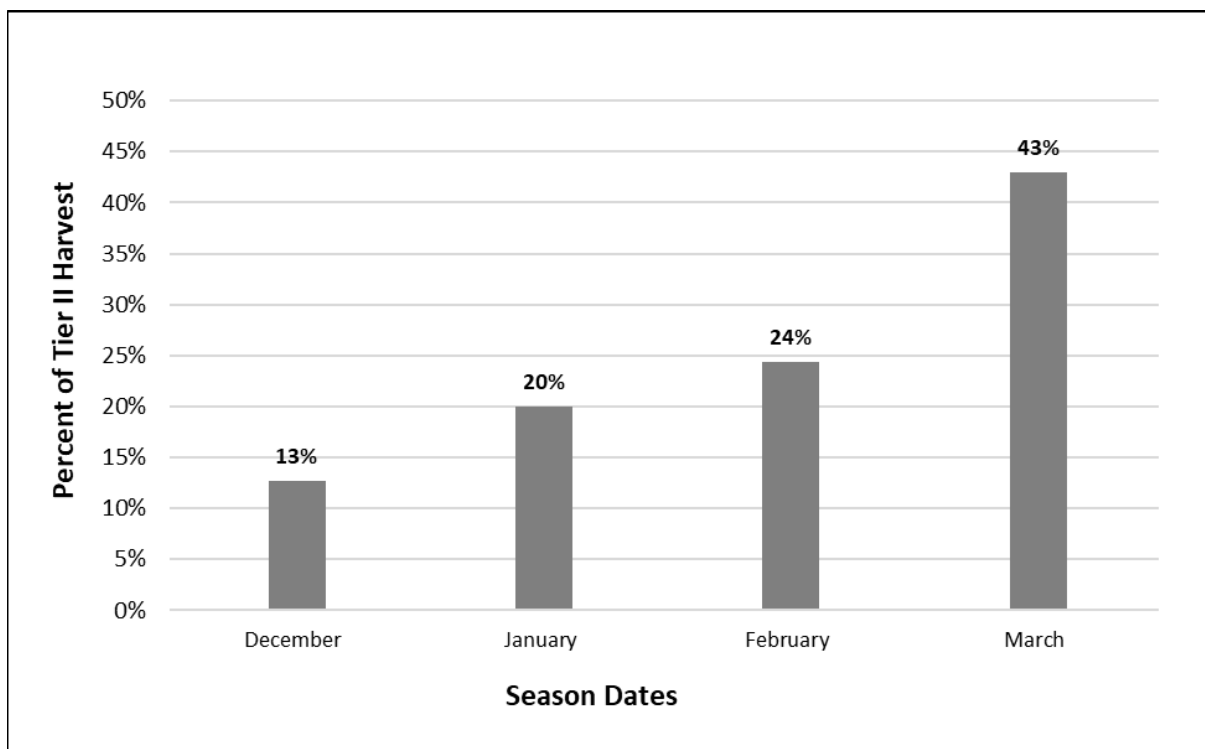


Figure 69-4. Chronology of harvest for Unit 16B Tier II moose hunts TM565, TM567, TM569, RY19–23.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because there would still remain opportunity for harvest, and it would not likely significantly decrease harvest. It would, however, remove the month where the majority of harvest occurs and constrict hunters to a shorter time frame at a time of year where environmental factors are less ideal, but moose may be in slightly better health. If the board chooses to adopt the shorter season, the department recommends the board amend the proposal to close the hunt on the last day of February. Also, if adopted, the board should consider whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting moose for subsistence uses.

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