

McGrath Area - Units 19, 21A and 21E

Proposal 89

5 AAC 85.045. Hunting seasons and bag limits for moose.

Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt managed by the Alaska Department of Fish and Game.

Proposed regulatory language:

5 AAC 85.045. Hunting seasons and bag limits for moose. Unit 19A:

REGISTRATION HUNT: One bull moose; season dates, permit numbers, and any antler restrictions to be established by the department through permit conditions based on current population status and harvest objectives.

[UNIT 19A MOOSE HUNT MANAGED UNDER TIER II SUBSISTENCE HUNTING]

What is the issue you would like the board to address and why?

Moose populations in Game Management Unit 19A have increased to a level where additional harvest opportunity may be provided while continuing to meet conservation and subsistence needs. Recent post-hunting season composition surveys indicate adequate calf-to-cow ratios and continued population growth, suggesting the herd can support increased harvest. These indicators suggest that harvest levels could exceed the Amount Necessary for Subsistence (ANS) without compromising sustained yield.

Unit 19A has met or exceeded the lower bounds of the ANS for multiple consecutive years. When populations are consistently meeting or exceeding ANS thresholds, it indicates that the resource is sufficient to provide for subsistence needs without the need for Tier II allocation. Continued use of Tier II under these conditions is inconsistent with its intended purpose, which is to restrict access only when harvestable surplus is insufficient to meet demand.

During the March 2024 Board of Game meeting, the board reduced the size of Unit 19A while simultaneously increasing the ANS for the unit. During this same period, village populations in the region have declined. This creates a situation where the current ANS may no longer accurately reflect present subsistence demand on the resource.

In addition, the current Tier II structure may no longer be necessary to allocate opportunity. In practice, the number of applicants closely aligns with the number of permits issued, resulting in most or all applicants receiving permits. This calls into question the need for a Tier II system, which is intended to limit participation when demand exceeds available harvest.

If no change is made, Unit 19A will remain under a Tier II framework that may no longer reflect current biological conditions or actual subsistence demand, and may continue to unnecessarily limit participation.

This proposal seeks to align management with current population status and user demand by transitioning the Unit 19A moose hunt from Tier II subsistence to a registration hunt, while maintaining the department's ability to regulate harvest, adjust permit numbers annually, and ensure long-term sustainability.

Population and composition data supporting this proposal are summarized in Alaska Department of Fish and Game moose survey updates, including post-hunting season surveys conducted in 2024 and 2025

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-084)

Proposal 90

5 AAC 92.540. Controlled Use Areas.

Repeal the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Current Regulation (5 AAC 92.540(3)(B)): (3) Holitna-Hoholitna Controlled Use Area (i) the area consists of those portions of Units 19(A) and 19(B) draining into the Kuskokwim River downstream from and including the Moose Creek drainage on the north bank from and including the Stony River drainage and downstream from and including the Swift River drainage on the south bank; (ii) the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of 40 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1; however, this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.

Proposed Regulation Change: Repeal the 40 HP restriction in subparagraph (ii) so it reads: (ii) ~~the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of 40 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1; however, this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.~~ [No horsepower restriction on boat motors.]

What would be the effect if this proposal is adopted? Hunters from GMU 18 and surrounding areas would have better access to GMU 19 hunting grounds using safer, more efficient boats. This could slightly increase hunting pressure, but existing seasons, bag limits, and reporting requirements would mitigate any conservation concerns. No significant negative impact on moose, caribou, or other big game populations is expected, as the restriction was originally intended to reduce disturbance but are no longer necessary with current management tools.

Who is likely to benefit? Local residents, subsistence users, and recreational hunters in GMUs 18 and 19 who rely on river travel for access. It would promote fairness and safety.

Who is likely to suffer? Possibly non-local hunters or those preferring low-disturbance areas, but overall impacts should be minimal.

What is the issue you would like the board to address and why?

The 40 horsepower (HP) boat motor restriction in the Holitna-Hoholitna Controlled Use Area (CUA) within GMU 19 limits access for hunters traveling from GMU 18 via connected waterways like the Holitna and Kuskokwim rivers. This restriction, which applies to hunting big game (including transportation of hunters, gear, or parts) from August 1 to November 1, prevents the use of boats with motors over 40 HP, even when necessary for safe navigation in strong currents, shallow waters, or long-distance travel. Residents and hunters in GMU 18 rely on these rivers for access to hunting areas in GMU 19, but the HP limit increases travel time, fuel consumption, and safety risks (e.g., getting stuck or unable to handle river conditions). Removing this restriction would improve equitable access without negatively impacting wildlife populations, as modern boats are more efficient and the area already has other protections like bag limits and seasons. This change would support subsistence and recreational hunting while maintaining conservation goals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Yes, Bethel Advisory Committee

PROPOSED BY: Bethel Advisory Committee

(OI-F26-054)

Proposal 91

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

What is the issue you would like the board to address and why?

The current regulation in the Holitna–Hoholitna Controlled Use Area limits outboard motors to 40 horsepower during the fall hunting season. While originally intended to reduce access pressure, this restriction creates practical and safety concerns for those traveling the river system.

The Holitna and Hoholitna rivers can present challenging conditions, including shallow sections, variable channels, and long travel distances. Operating with smaller motors can reduce a hunter's ability to navigate safely, especially when transporting gear or harvested game. This can lead to increased risk and reduced reliability in remote areas.

In addition, modern boat designs and common usage have shifted toward higher horsepower motors, and the current restriction does not reflect how most boats are now configured for safe operation

If the restriction remains in place, hunters will continue to face limitations that may impact safe travel and efficient retrieval of game. As equipment standards continue to evolve, the regulation may become increasingly impractical and misaligned with real-world conditions.

Removing the horsepower restriction would allow individuals to operate equipment that is better suited for current river conditions and modern boat setups. This would improve safety, reliability, and overall efficiency without eliminating other existing controls in the area.

Maintaining the aircraft restriction and other elements of the controlled use area continues to limit certain types of access, while removing the horsepower cap addresses a specific concern that no longer serves its intended purpose.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Family

PROPOSED BY: Kenneth Owens

(OI-F26-073)

Proposal 92

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

What is the issue you would like the board to address and why?

The Holitna–Hoholitna Controlled Use Area currently restricts the use of outboard motors greater than 40 horsepower for big game hunting. While intended to limit access and reduce hunting pressure, this restriction creates safety concerns and practical limitations for hunters navigating the Holitna and Hoholitna river systems.

River conditions in this area can include shallow water, strong currents, debris, and long travel distances. Limiting hunters to smaller motors can reduce maneuverability and reliability, particularly when boats are heavily loaded with gear or game meat. This may increase risk during travel and limit the ability to respond to changing river conditions.

Additionally, advances in boat and motor technology have made higher horsepower motors more common and, in many cases, necessary for safe and efficient operation. The current restriction does not reflect these changes and may place hunters using standard modern equipment at a disadvantage.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Family

PROPOSED BY: Edward Enoch

(OI-F26-074)

Proposal 93

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

What is the issue you would like the board to address and why?

The 40 horsepower motor restriction in the Holitna–Hoholitna Controlled Use Area places unnecessary limits on how people can safely travel the river system during hunting season.

The rivers in this area are long, remote, and can change quickly depending on water levels and conditions. Using a smaller motor can make travel slower and less dependable, especially when hauling gear or returning with meat. In some situations, this can create safety concerns or make it difficult to complete a trip efficiently.

Many boats in use today are designed to run with higher horsepower motors, and limiting them to 40 horsepower does not match how most people are equipped. This can make it harder for hunters to use the equipment they already have safely and effectively.

If the current restriction remains, people will continue to deal with limitations that can affect safe travel and the ability to move efficiently on the river. This may discourage use of the area or create ongoing safety concerns for those who rely on it.

Removing the horsepower limit would allow people to use appropriate equipment for the conditions without changing other existing restrictions in the area. It would improve safety and practicality while still maintaining the intent of managing access through other means already in place.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Friends and family

PROPOSED BY: John Wuya

(OI-F26-075)

Proposal 94

5 AAC 92.540. Controlled Use Areas.

Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Recommended solution: Increase the horsepower limit from 40 hp to 115 hp to allow safe operation with both prop and jet drives commonly used by Unit 18 hunters.

Regulatory language Draft:

5 AAC 92.540. Controlled use areas.

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(B) the Holitna-Hoholitna Controlled Use Area:

(i) the area consists of the waters of the Holitna River downstream from Kashegelo, the Titnuk River (Creek) downstream from Fuller Mountain and the Hoholitna River downstream from the confluence of the South Fork and main Hoholitna River;

(ii) the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of [40] 115 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through November 1; however this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.

What is the issue you would like the board to address and why?

The Holitna-Hoholitna Controlled Use Area in Unit 19 currently limits boat motors to 40 horsepower. This restriction creates serious safety and access problems for residents of Unit 18 who must travel long distances on the Kuskokwim River system to reach traditional hunting areas in the Holitna and Hoholitna drainages.

Hunters from Unit 18 regularly use larger motors for safe travel due to strong currents, unpredictable weather, heavy loads of gear and meat, and long round-trip distances. When switching from a propeller to a jet unit — a common practice in shallow or changing river conditions — horsepower is significantly reduced. A 40 hp limit does not provide enough power once converted to a jet, forcing underpowered boats and creating safety risks.

ADF&G already effectively manages harvest in the area through check stations in the Upper Holitna-Hoholitna Management Area, bag limits, seasons, and other tools. If nothing is changed, Unit 18 residents will continue to be practically excluded from these historically used hunting grounds, reducing equitable opportunity and food security for rural families.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

I developed this proposal based on my direct experience as a Unit 18 hunter and discussions with other residents who travel the Kuskokwim and Holitna rivers. Many of us run propeller drives for the main river travel and then switch to jet units when river conditions change. The current 40 hp limit does not account for this common and necessary practice. I have not yet coordinated with my local Advisory Committee but plan to do so.

PROPOSED BY: Nicholas Ayapan

(OI-F26-121)

Proposal 95

5 AAC 92.540. Controlled Use Areas.

Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than 115 horsepower to take big game.

If the current restriction remains in place, users will continue to operate with limited effective power when using jet units, which are common in this type of river system. This may result in continued challenges related to safe navigation, load carrying, and travel efficiency.

Increasing the limit to **115 horsepower** accounts for the reduction in usable power when motors are equipped with jet units. This provides a more practical level of performance while still maintaining a defined upper limit on motor size.

This change would improve the ability of users to safely and effectively travel in the area without removing all restrictions on motorized access. It reflects current equipment standards and typical use patterns while maintaining a controlled approach to managing access.

What is the issue you would like the board to address and why?

The current 40 horsepower restriction in the Holitna–Hoholitna Controlled Use Area does not reflect how boats are commonly used on these rivers today, particularly with the widespread use of jet outboards.

Jet units significantly reduce the effective horsepower delivered to the water compared to prop-driven motors. As a result, a motor rated at 40 horsepower provides substantially less usable power when configured as a jet, which can limit maneuverability and performance in shallow, braided, and fast-moving river conditions.

Travel in the Holitna and Hoholitna systems often involves long distances, variable water levels, and heavy loads. Underpowered boats can struggle in these conditions, especially when transporting gear or harvested game. The current limit can therefore create operational challenges and reduce the margin of safety for users.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSED BY: Samuel Hancock

(OI-F26-060)

Proposal 96

5 AAC 85.045. Hunting seasons and bag limits for moose.

Amend the permit conditions for RM682 to allow permit holders to also hold and use other valid moose permits in the Kuskokwim drainage as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

This change would primarily affect the special conditions for hunt RM682 under 5 AAC 85.045 (hunting seasons and bag limits for moose) and/or 5 AAC 92 (permit hunt procedures). The current restriction appears in hunt-specific details and permit issuance rules.

Current (as described in hunt info and permit conditions): If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year. [Or similar language prohibiting holding RM682 with other Kuskokwim drainage moose permits.]

Proposed Regulation Change: Amend the permit conditions for RM682 to remove the exclusion: ~~If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.~~ **Hunters who receive an RM682 permit may also hold and use other valid moose permits in the Kuskokwim drainage, subject to all other applicable regulations.**

(If a specific codification exists in 5 AAC 85.045(a)(19) or permit regs, reference it; otherwise, this targets the hunt condition directly.)

What would be the effect if this proposal is adopted? Hunters could participate in RM682 and other moose hunts in the Kuskokwim drainage (e.g., combining with permits in adjacent subunits), increasing flexibility for subsistence users and locals without significantly increasing overall harvest pressure, as reporting remains mandatory and populations are monitored.

Who is likely to benefit? Resident hunters, especially subsistence users in the Kuskokwim region and those accessing from areas like GMU 18, who face access challenges and want multiple opportunities.

Who is likely to suffer? Minimal impact: possibly slight increase in effort in some areas, but conservation tools (seasons, quotas if any, reporting) would prevent overharvest.

What is the issue you would like the board to address and why?

The registration moose permit RM682 in Unit 19E includes a restriction that prohibits a hunter from holding or using this permit if they hold any other moose hunting permit in the Kuskokwim drainage for the regulatory year. This excludes hunters from participating in multiple compatible moose hunts (e.g., registration or Tier II permits in adjacent or overlapping areas like other parts of the Kuskokwim drainage). For residents in or accessing via areas like GMU 18 or along the Kuskokwim River, this limits opportunities for subsistence or recreational hunting, reduces flexibility, and may create unnecessary barriers without clear conservation benefits. Removing this exclusion would allow hunters to hold RM682 alongside other valid moose permits in the drainage, promoting equitable access while existing harvest reporting, seasons, and bag limits continue to manage populations sustainably

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Bethel Advisory Committee

PROPOSED BY: Bethel Advisory Committee

(OI-F26-055)

Proposal 97

5 AAC 85.045. Hunting seasons and bag limits for moose.

Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage. This modest change gives hunters needed flexibility while keeping all hunt-specific seasons, bag limits, and reporting requirements in place.

Regulatory language draft:

5 AAC 85.045. Hunting seasons and bag limits for moose.

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For the RM682 registration moose hunt in Unit 19E remainder:

Current language: If you receive a RM682 permit you [CANNOT] receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.

Proposed language: If you receive a RM682 permit you MAY receive and hunt under another permit to hunt moose in the Kuskokwim drainage this regulatory year. This includes permits such as RM615 and others.

Hunters who receive an RM682 permit may also hold and use other valid moose permits in the Kuskokwim drainage, subject to all other applicable regulations. All hunt-specific seasons, bag limits (one antlered bull), and reporting requirements remain in effect.

What is the issue you would like the board to address and why?

The RM682 registration moose permit for Unit 19E remainder currently states: “If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.” This restriction forces residents of Unit 18 and other Kuskokwim communities to choose between the short early-season RM682 hunt and other important moose hunting opportunities, such as registration hunts in Unit 18 (e.g., RM615).

This “one-tag-only” rule is overly restrictive for rural hunters who rely on multiple flexible opportunities for food security. RM682 is a limited, short-duration registration hunt with low harvest pressure. ADF&G already controls overall moose harvest through permit quotas, season length, bag limits, and reporting requirements. If nothing changes, hunters who obtain RM682 will continue to lose access to other compatible Kuskokwim moose hunts, reducing opportunity without clear conservation benefits.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal is based on my personal experience hunting moose on the Kuskokwim River areas as a Unit 18 resident. Along with other rural Kuskokwim residents. The current restriction creates unnecessary hardship when trying to plan hunts across multiple registration opportunities.

PROPOSED BY: Nicholas Ayapan (OI-F26-122)

Proposal 98

5 AAC 92.123. Intensive Management Plans VII.

Reauthorize the Unit 19D East Intensive Management predation control program as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

5 AAC 92.123(c). Unit 19(D)-East Predation Control Area.

(c) Unit 19(D)-East Predation Control Area: the Unit 19(D)-East Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage, but excluding the Black River drainage, encompassing approximately 8,513 square miles; this predation control program does not apply to any National Park Service or National Wildlife Refuge lands unless approved by the federal

agencies; notwithstanding any other provisions in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf and a black bear and a brown bear population reduction or a wolf and a black bear and a brown bear population regulation program in Unit 19(D)-East to benefit moose:

(1) the following Wolf and Bear Control Focus Areas are established in the Unit 19(D)-East Predation Control Area; the areas do not delineate a moose, wolf, or bear population and are not intended to distinguish animals within the focus areas from populations in Unit 19(D)-East; the purpose is to focus wolf and bear control in a relatively small area where moose numbers can be better estimated, where moose are accessible to hunters, and where harvest can be closely monitored;

(A) the Wolf Control Focus Area (WCFA) encompasses approximately 5,579 square miles within that portion of Unit 19(D) upstream of the Selatna River drainage, but excluding the Black River drainage, and downstream of, but not including Fourth of July Creek, the Swift Fork, or the Slow Fork and Tonzona River drainages east of 153° 10.00' W. long.; wolf control will be conducted only within the WCFA; the department will have the discretion to adjust the WCFA's size and shape to include up to approximately 6,000 square miles of Unit 19(D)-East;

(B) the Black Bear and Brown Bear Predation Control Focus Area (BCFA) encompasses approximately 528 square miles consisting of those portions of the Kuskokwim River drainage enclosed by a line starting at a point northwest of McGrath at 63° 04.00' N. lat., 155° 50.00' W. long., then east to 63° 04.00' N. lat., 154° 50.00' W. long., then south to 62° 54.00' N. lat., 154° 50.00' W. long., then west to 62° 54.00' N. lat., 155° 25.00' W. long., then south to 62° 50.00' N. lat., 155° 25.00' W. long., then west to 62° 50.00' N. lat., 155° 30.00' W. long., then south to 62° 48.00' N. lat., 155° 30.00' W. long., then west to 62° 48.00' N. lat., 155° 35.00' W. long., then south to 62° 42.00' N. lat., 155° 35.00' W. long., then west to 62° 42.00' N. lat., 155° 55.00' W. long., then north to 62° 50.00' N. lat., 155° 55.00' W. long., then east to 62° 50.00' N. lat., 155° 50.00' W. long., then north to the point of beginning at 63° 04.00' N. lat., 155° 50.00' W. long., surrounding the village of McGrath; bear control will be conducted only within the BCFA; the department will have the discretion to adjust the BCFA's size and shape up to approximately 680 square miles of Unit 19(D)-East; the BCFA is within the WCFA;

(2) this is a continuing control program that was first authorized by the board in 1995; wolf control began in winter 2003 - 2004 and bear control began with nonlethal removal of bears in the BCFA during May 2003 and May 2004; the control program is currently designed to increase moose numbers and harvest in the WCFA and BCFA by reducing predation on moose and is expected to make a contribution to achieving the intensive management (IM) objectives in Unit 19(D)-East;

(3) moose, wolf, black bear, and brown bear objectives are as follows:

(A) moose IM objectives established by the board for Unit 19(D)-East are for a population of 6,000 - 8,000 moose and an annual harvest of 400 - 600 moose;

(B) the **population** [DENSITY] objective for moose in the WCFA is **5,600 moose** [1.0 MOOSE PER SQUARE MILE] (corrected for sightability) in fall **or late winter** surveys; **the population objective for moose in the BCFA is 1,050 moose (corrected for sightability) in fall or late winter surveys;** the annual harvest objective for the WCFA is **140** [225] moose;

(C) the wolf control objective in the WCFA is to reduce wolf numbers **to the lowest level possible** [BY AT LEAST 60 - 80 PERCENT]; the pre-control wolf population in Unit 19(D)-East was estimated in February 2001 at 198 wolves; the 2001 pre-control estimate within the WCFA **was** [IS] 130 wolves; only removing wolves from the WCFA will ensure that wolves persist in Unit 19(D)-East.

(D) the black bear control objective in the BCFA is to reduce black bear numbers to the lowest level possible; the pre-control black bear population in Unit 19(D)-East was estimated at 1,700 black bears; the pre-control black bear population estimate within the BCFA was approximately 130 black bears; because the BCFA is a relatively small geographic area, removing black bears from within the BCFA will have only a minor effect on the black bear population in Unit 19(D)-East;

(E) the brown bear control objective in the BCFA is to reduce brown bear numbers to the lowest level possible; the pre-control brown bear population in Unit 19(D)-East was estimated at 128 brown bears; the pre-control brown bear population estimate within the BCFA was nine; because the BCFA is a relatively small geographic area, removing brown bears from within the BCFA will have only a minor effect on the brown bear population in Unit 19(D)-East;

(4) board findings concerning populations and human use are as follows:

(A) the Unit 19(D)-East moose **population and harvest objectives have** [HARVEST OBJECTIVE HAS] not been achieved;

(B) the [WCFA OBJECTIVE FOR MOOSE HARVEST HAS NOT BEEN ACHIEVED;] **moose population in the WCFA and BCFA are currently below objective and harvest in the WCFA is currently below objective;**

(C) predation by wolves and bears is an important cause of the failure to achieve **population and** harvest objectives;

(D) a reduction of wolf and bear predation within the WCFA and BCFA can reasonably be expected to make progress towards achieving the Unit 19(D)-East intensive management objectives;

(E) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(F) reducing predation is likely to be effective given land ownership patterns;

(G) Unit 19D-East is recognized under the state's intensive management law as an area where moose are to be managed for high levels of harvest for human consumptive use; reducing predation is in the best interest of subsistence users; the area has long been an important hunting area for subsistence by local area residents as well as other Alaska residents;

(5) **if the moose population in the WCFA and BCFA, and harvest objectives in the WCFA are not met and two-year average twinning rates are above 20 percent,** authorized methods and means are as follows:

(A) hunting and trapping of wolves and hunting of black bears and brown bears by the public in Unit 19(D)-East during the term of this program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783;

(C) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits using fixed-wing aircraft as a method of wolf removal under AS 16.05.783;

(6) time frame is as follows:

(A) before July 1, **2033** [2030], the commissioner may authorize removal of wolves and black bears and brown bears in Unit 19(D)-East;

(B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose, wolf, and bear populations, and recommendations for changes, if necessary to achieve the objectives of the plan;

(7) the commissioner will review, modify, or suspend program activities when:

(A) the moose **population in the WCFA or BCFA, or harvest objectives in the WCFA are achieved;** [DENSITY AND HARVEST OBJECTIVES SPECIFIED IN THIS SUBSECTION ARE ACHIEVED WITHIN THE WCFA;]

(B) any measure consistent with signs of nutritional stress in the moose population are identified.

What is the issue you would like the board to address and why?

The 19D-East Predation Control Plan was initially authorized in 1995. However, the predation control program did not begin until December 2003. The Board of Game (board) authorized the current plan in March 2020, reauthorized it in March 2024, and it expires June 30, 2030. The current plan has not been updated since 2020 and this proposal seeks to evaluate the current objectives, including program-specific harvest objectives, population objectives, and predator removal objectives. If approved by the board, this plan will remain in place from July 1, 2027 through June 30, 2033.

Both department and public periods of bear removal, a 23-year wolf removal program and a large wildfire have occurred since the program was implemented confounding the department's ability to assess the program's efficacy. Moose abundance increased from 2003 through 2022. However, following an exceptionally deep snow winter (2022/2023) the moose population declined to 2012 levels.

The current program objectives include achieving a moose abundance of 1.0 moose/mi² and a harvest objective of 225 moose, both measured at the scale of the Wolf Control Focus Area (WCFA). While moose harvest from the WCFA is assessed annually, geospatial population estimate (GSPE) surveys for moose are conducted in a 1,118 mi² area surrounding the Bear Control Focus Area (BCFA). The department conducted these surveys as part of an ongoing research program, but they precluded more frequent surveys of the WCFA, which has not been surveyed since 2017. Within the WCFA, moose densities approximately doubled from 2001 (0.5 moose/mi²) to 2017 (1.1 moose/mi²), briefly exceeding the IM density objective of 1.0 moose/mi². While the WCFA has not been surveyed since 2017, a 2023 GSPE survey in the 1,118 mi² survey area surrounding the BCFA showed a decline of approximately 36% to 1.4 moose/mi², after reaching a high of 2.1 moose/mi² in 2017. If the WCFA moose density declined at a similar rate, the moose population there would now be below the density objective for the WCFA. The harvest objective of 225 moose has not been met to date. However, with the limited access in Unit 19D East, it is unlikely a harvest of 225 moose can be achieved.

Wolf removal objectives in this program have been tied to a pre-control abundance estimate of 198 wolves (23 wolves/1000mi²) in 2001 in Unit 19D East. Using this density, the department estimated there were 130 wolves, pre-control, in the current WCFA (5,579 mi²). Only public aerial wolf removals have been conducted and most wolves are removed in February-March, with highly variable removal rates. The population has been able to sustain removals of 14-73 wolves and maintain an average fall population of 54 wolves. In the last decade, fall wolf abundance estimates have been among the highest recorded by the department during the program, similar to those recorded in the mid-1990s, but likely low compared to the current prey base. Total wolf removals in the last decade have also been among the highest recorded in the program, suggesting the sustainability of the wolf removal levels.

Moving forward, the WCFA will be the primary focus for abundance estimates for moose, with a secondary objective based on the BCFA. The department is reducing the moose harvest objectives within the WCFA to more closely reflect demonstrated historical levels of harvest, and to reflect what is achievable in areas that are accessible to hunters (i.e. river corridors and the limited road systems).

This proposal retains the option of both public- and department-conducted wolf removals, and department-conducted bear removals. The department will issue public aerial permits as long as the moose population is below the stated population and harvest objectives, and the department has no indications of nutritional stress in moose. Removing bears only from the BCFA, and wolves only from the WCFA will ensure predator populations persist in Unit 19D East.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-026)

Proposal 99

5 AAC 92.540. Controlled Use Areas.

Update Upper Kuskokwim Controlled Use Area (UKCUA) transportation of moose hunters, their gear, and parts of moose dates from Sept 1-25 to Sep 1-30 to align with current hunting season as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

(7) Unit 19:

(A) the Upper Kuskokwim Controlled Use Area:

(i) the area consists of that portion of Unit 19(D) extending two miles on either side of, and including the Kuskokwim River, upstream from the mouth of the Black River to the mouth of the Swift Fork, extending two miles on either side of, and including, the Takotna River, upstream from the mouth of the Takotna River to Takotna, and extending two miles on either side of, and including, the South Fork River, upstream from the mouth of the South Fork to Nikolai;

(ii) the area is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, or parts of moose during open moose hunting seasons [FROM SEPTEMBER 1 THROUGH SEPTEMBER 25]; however, this provision does not apply to the transportation of moose hunters, their hunting gear, or parts of moose by aircraft between publicly owned airports including McGrath, Medfra, Nikolai, and Takotna, or the transportation into the area of game meat that has been processed for human consumption;

What is the issue you would like the board to address and why?

The Upper Kuskokwim Controlled Use Area (UKCUA) prohibits the transportation of moose hunters, their gear, and parts of moose from Sept 1-25. Prior to RY17 this prohibition was in place all year long, but publicly owned airports were excluded. In March 2017 the board passed proposal 81 which specifically named the publicly owned airports within the UKCUA (McGrath,

Medfra, Nikolai, and Takotna) and also limited the UKCUA prohibitions to September 1-25. In March 2024, the board passed proposal 66 which lengthened the moose hunting season to September 30th. However, no changes were made to the UKCUA prohibition dates and the moose hunting season dates and the UKCUA dates are now out of alignment. This housekeeping proposal would realign the dates.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-175)

Proposal 100

5 AAC 85.045. Hunting seasons and bag limits for moose.

Make the RM650 permit available online as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

By having the RM650 permit available online, the hunters from Lower Kuskokwim River will have the ability to attain the permit with-in the current dates that are posted in the hunting regulations for this hunt. This will also save the Hunters / Subsistence users money to purchase fuel for their up-coming hunt instead of having to make two trips up to McGrath to attain the RM650 Permit. The Board of Game can Limit the number of permits to be issued online.

What is the issue you would like the board to address and why?

Make the RM650 Registration Permit available online.

With having the RM650 Registration permit only available in person in set area McGrath, Nikolai and Takotna, it is harder for people that are from the lower Kuskokwim River to get the RM650 Permit. By having the hunter show up in person and the possibility of the hunter having to come back up river less than 30 days later, that will put an impact on being able to purchase fuel for their future hunt. Price of fuel and hunting related items has gone up over the past few years. Just recently the Board of Game has made the RM682 Permit available online with only a certain amount to obtained online.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Bethel AC is in favor of having the RM650 Permit Available online to help out future hunters / subsistence users on the Kuskokwim River

PROPOSED BY: Bethel Advisory Committee (OI-F26-069)

Proposal 101

5 AAC 85.045. Hunting seasons and bag limits for moose.

Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only.

Unit 19D, remainder (between and including the Cheeneetnuk and Kogrukluk River drainages, excluding within 2 miles of the Swift River):

Residents and nonresidents: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side; HT; Sept. 1–Sept. 20.

Residents and nonresidents: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side; by bow and arrow only; certified bowhunters using traditional longbows and recurve bows only; HT; Sept. 21–Sept. 25.

What is the issue you would like the board to address and why?

Moose hunting opportunity in Unit 19D is limited by the current season length. extending the season by five days under a highly selective method of take would provide additional time afield while maintaining negligible impact on overall harvest.

Extending opportunity in this manner would also help distribute hunter effort over a longer period, reducing crowding and competition during the existing general season. Spreading out hunter participation can improve overall hunt quality and reduce user conflicts without increasing pressure on the resource.

Warmer early-season conditions in recent years have increasingly created challenges for meat care and spoilage prevention. Providing a later opportunity under a highly selective method of take would allow harvest to occur under more favorable conditions, supporting proper meat care and reducing waste.

Restricting this extension to traditional longbows and recurve bows ensures that any additional harvest remains minimal. The effective range and difficulty associated with traditional equipment inherently limit success rates, resulting in low overall harvest even with increased opportunity.

This approach is not new. Multiple states (Oregon, Utah, Oklahoma, etc) have implemented traditional archery opportunities to increase time afield while maintaining low harvest levels. These seasons have proven effective at expanding opportunity without negatively affecting game populations.

There is also a substantial segment of the hunting community that actively seeks out more challenging methods of take. Traditional archery participation is not limited to a small niche;

many hunters are willing to accept lower success rates in exchange for a more challenging and deliberate hunting experience. Providing this opportunity aligns with that demand while maintaining conservative harvest levels.

If no change is made, opportunity remains limited despite the availability of a management tool that can increase participation without increasing harvest pressure.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Members and Board of Directors of Compton Traditional Bowhunters

PROPOSED BY: Compton Traditional Bowhunters

(OI-F26-124)

Proposal 102

5 AAC 85.045(a)(17)(B). Hunting seasons and bag limits for moose.

Reauthorize a fall antlerless hunt during September and a winter any-moose season during February in a portion of Unit 19D as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		
...		
Unit 19(D), that portion of the Black River drainage within 2 miles of the Kuskokwim River and that portion of the Selatna River drainage north of the Selatna River within 2 miles of the Kuskokwim River		
...		
1 antlerless moose by drawing permit only; up to 20 cows may be taken	Sept. 1 – Sept. 30 (General hunt only)	No open season

Unit 19(D), that portion 2 miles on either side of the Kuskokwim River from the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim River, and 2 miles on either side of the South Fork of the Kuskokwim River from the mouth to Nikolai, and 2 miles on either side of the Takotna River from the mouth to the bridge at Takotna, excluding the Black River drainage and the Selatna River drainage

...

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
1 antlerless moose by drawing permit only; up to 20 cows may be taken; or	Sept. 1 – Sept. 30 (General hunt only)	No open season
1 moose by registration permit only; a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season

Unit 19(D), that portion of the Black River drainage excluding that portion within 2 miles of the Kuskokwim River, and that portion of the Selatna River drainage north of the Selatna River, and excluding that portion with 2 miles of the Kuskokwim River

...

Sept. 1 – Sept. 30 (General hunt only)	No open season
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1 antlerless moose by drawing permit only; up to 20 cows may be taken

Unit 19(D) Remainder

...

Sept. 1 – Sept. 30
(General hunt only)

No open season

1 antlerless moose by drawing permit only; up to 20 cows may be taken; or

Feb. 1 – Last day of Feb.

No open season

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

What is the issue you would like the board to address and why?

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game (board).

The moose population in Unit 19D upstream of the Selatna River recently experienced a significant decline due to the extremely difficult winter of 2022–2023. During a November 2023 geospatial population estimate (GSPE), the department documented a decline from 2,471 moose (2.2 moose/mi²) to 1,591 moose (1.4 moose/mi²). Due to this decline, the department closed the winter hunt in regulatory year (RY) 23 by emergency order. In March 2024, the board adopted Proposal 66, which was submitted by the McGrath Advisory Committee (AC) prior to the documented decline, and authorized a new drawing permit hunt in the fall for cows in a portion of Unit 19D. Both hunts were reauthorized by the board in March 2026 with unanimous support from the McGrath AC. To allow the moose population to recover from the 2022–2023 winter decline, the department did not implement any antlerless hunts during RY24 and RY25. While the department does not intend to issue antlerless permits in RY27, the department would like to keep the hunt available as a tool to provide additional opportunity when it is again warranted.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-013)

Proposal 103

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Change the current 19C Dall Sheep hunting regulations as follows:

-Residents: One ram with full-curl horn or larger, RSXXX, [NO OPEN SEASON], Aug 10-Sept 20

Registration permit for residents, capped at (15) rams taken by full-curl horn or larger, broomed or broken on both sides or 8 years old or larger.

-Non-Residents: One ram with full-curl horn or larger, DSXXX, [NO OPEN SEASON], Aug 10-Sept 20

Drawing permit for non-residents and 2DK, capped at (5) total draw permits with up to (1) draw permit allocated to 2DK

What is the issue you would like the board to address and why?

The Matanuska Valley Advisory Committee would like to see a change to the current regulations for Dall Sheep in unit 19C to allow for a registration permit hunt for residents. Due to no biological concerns with full-curl management implementation, coupled with a conservatively capped registration permit, opportunity to hunt 19C would be granted to all resident sheep hunters. The Matanuska Valley Advisory Committee has always supported resident hunting opportunity, and this would allow for a hunting opportunity to resume after the recent closure to both residents and non-residents. We would ask for a (7) day reporting period for the registration permit, giving time for hunters to leave the field and promptly report whether successful or unsuccessful.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Matanuska Valley Fish & Game Advisory Committee (OI-F26-149)

Proposal 104

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

A general sheep season for residents in Unit 19C should again be allowed. There is a harvestable surplus of rams in Unit 19C for a general season resident sheep hunt according to the Department, which poses no sheep conservation concerns at this time. Nonresident sheep hunting should be draw-permit only with a limited allocation.

Unit 19C Sheep

Residents: One ram with full-curl horn or larger by Harvest Ticket Aug 10 – Sept 20

Nonresidents: One ram with full-curl horn or larger every four regulatory years by draw permit Aug 10 – Sept 20 (up-to 10 permits) until a Guide Concession Program is implemented

What is the issue you would like the board to address and why?

LOSS OF RESIDENT SHEEP HUNTING OPPORTUNITY IN UNIT 19C

At the March, 2025, Statewide Board of Game Meeting, when the board was deliberating Proposal 190 that would shut down resident sheep hunting opportunity in Unit 19C for the 2025 fall season and in 2026 put resident and nonresident sheep hunters on a draw permit system, the Alaska Department of Fish and Game (Department) told the board that there was a harvestable surplus of sheep in Unit 19C for residents under a general season hunt, and that they had no conservation concerns over continued resident general sheep hunting opportunity in the unit, even though the sheep population was in decline..

The board had already closed Unit 19C in 2023 to all nonresident sheep hunting opportunity due to conservation concerns that arose after the board allowed unlimited nonresident sheep hunting opportunity that resulted in nonresident guided hunters taking 90 percent of the sheep harvest in 2022 from the declining sheep population.

At that time, and previously, the board stated that the problem was “too many guides” in the unit, not their allowance of unlimited sheep hunting opportunity for nonresidents who are required to hire a guide. Whether the problem was too many guides, or too many nonresident sheep hunters, the board’s conservation concerns related to what they believed was an overharvest of sheep in Unit 19C by nonresident guided hunters. Resident sheep hunters never posed a sheep conservation concern.

The board’s decision in 2025 to shut down the resident sheep season in 19C, and make it a draw hunt for both residents and nonresidents starting in 2026, had a caveat that general sheep hunting opportunity in 19C for residents and nonresidents would only be allowed in the future if there were limits on guides via a Guide Concession Program (GCP) the legislature authorized

during the 2025 session (SB 73) which could be implemented as a test program in a unit of the board's choosing

Why are resident sheep hunters bearing the burden of this closure and subsequent draw hunts when the Department says there are no sheep conservation concerns with continued resident general sheep hunting opportunity, and the board has determined that the problem was too many guides? Why is resident general sheep hunting opportunity in the future dependent on limiting guides? What the board is really alluding is that if guides are not limited in 19C there will continue to be an overharvest of sheep from a declining sheep population by nonresident guided hunters.

The only sheep hunters in Unit 19C that need to be on a draw permit system before guides are limited are nonresidents.

Unit 19C Guide Concession Program & Timeline

The board passed a proposal in March of 2025 that would implement a GCP in Unit 19C, however, the Department of Law stated that the way the board adopted that proposal was not legal, and a new proposal must come forth in 2027 to designate Unit 19C as the first area where a test GCP will be implemented.

The Department of Natural Resources (DNR) has hired one additional employee for the GCP but the Department has not received the funds allocated by SB 73 to hire additional staff deemed necessary for their role in the GCP. Realistically, we are likely looking at a minimum of three years from the time the board passes a GCP proposal in 2027 before the program would be in place and implemented.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-162)

Proposal 105

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, but keep nonresidents on a draw permit system with limited allocation until a GCP is implemented as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Re-open Unit 19C to resident general sheep hunting opportunity

Keep nonresidents on a draw permit system with limited allocation until a GCP is implemented

Unit 19C Sheep Residents

Aug 10 – Sept 20

One ram with full-curl horn or larger (OTC permit)

Unit 19C Sheep Nonresidents Aug 10 – Sept 20

One ram with full-curl horn or larger every four regulatory years by draw permit only Up to 4 permits

When/if a Guide Concession Program is implemented in Unit 19C, nonresident sheep hunters will go off draw permit and be able to hunt under an OTC permit.

What is the issue you would like the board to address and why?

Sheep Declines in Unit 19C, Resident Loss of Opportunity, Guide Concession Program

For several cycles, Resident Hunters of Alaska (RHAK) submitted proposals to limit nonresident sheep hunters in Unit 19C due to high nonresident harvest rates, a declining sheep population, and fears that residents would lose sheep hunting opportunity if the board did not limit nonresident sheep hunters.

Every one of our proposals was voted down, with the board using the rationale that under full-curl harvest management, there were no conservation concerns (even with low sheep numbers) with continued unlimited nonresident sheep hunting opportunity. The board admitted all along that there were problems, but they said the problems stemmed from unlimited guides in the unit, not the unlimited opportunity they gave to nonresident sheep hunters who must be guided.

This entire decade and more of us submitting proposals and them being voted down, only for the board to eventually say there were sheep conservation concerns in Unit 19C due to no limits on guides (i.e. unlimited nonresident opportunity) has been disheartening to say the least.

Resident sheep hunters are now on a draw system for Unit 19C sheep, with 16 permits being issued. Residents *did* end up losing sheep hunting opportunity, just like we feared due to inaction by the board to limit the nonresident component.

Residents will not gain general season OTC opportunity again until a Guide Concession Program (GCP) is implemented. The board has not even chosen an area yet for the initial experimental GCP that can only be implemented in one Unit. ADFG does not have the funding for their role in a GCP. The Department of Natural Resources (DNR) has hired one person for their role in the GCP but they have told us that the earliest they see a GCP being implemented is at least 3 years out from the time the board chooses an area.

This whole thing is flat-out ridiculous that the board would allow unlimited nonresident sheep hunting opportunity in an area they knew had drastic sheep declines and allow nonresidents to

harvest 90 percent of the sheep the last year it was open to everyone. Resident sheep hunters should not have to bear the burden of lost opportunity when all along they were not a part of the problem.

Tying resident opportunity to a program to limit guides is also just ridiculous. What do guides have to do with resident sheep hunting opportunity? Why does no limits on guides lead to a resident sheep hunting closure? It's the board's job to use their authority to fix problems, not delay for over a decade when they could have fixed the problem all along by limiting nonresident sheep hunters, which in turn limits the number of guides.

The reason we are here now with Unit 19C being a draw-only hunt for residents until a GCP is implemented in the unit is because the board had a preferred option that was best for the guide industry. They chose that option and delayed acting for over a decade, rather than doing what was best for the sheep and resident sheep hunters all along.

Residents should be allowed general season OTC sheep hunting opportunity in Unit 19C again. ***Resident sheep hunters should not have to wait until guides in the unit are limited to hunt again under a general season.***

The board's rationale on this matter makes no sense when you really think about it. "We can't let residents hunt sheep under a general season because there are too many guides." "Too many sheep will be taken if we don't limit guides."

What kind of state do we live in whereby guides and the guide industry can negatively affect resident sheep hunting opportunity? To say we are disappointed is a gross understatement. We are angry! This kind of thing should never be allowed to happen! No other state would allow it to happen except Alaska, where we cater to the guide industry in ways that make no sense. It is not the board's job to provide stability to the guide industry!

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-138)

Proposal 106

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute. With 95% of the state on full curl management regardless of population numbers why is 19C the exception?

What is the issue you would like the board to address and why?

Restore the previous BIOLOGICALLY proven management strategy of full curl, 8 year old or double broken to a harvest ticket status. I believe that the previous decision made in 2023 was emotionally driven and not science based. The ADF&G Biologist stated that they did not recommend a closure or a drawing hunt. There was no biological evidence that this was needed, sheep populations ebb & flow with nature and are just currently in a down cycle.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

I have been very active in talking with local biologists & staying up to date of count survey data. The last two years have shown the sheep on the upward trend & if weather allows should continue to replenish the overall population. This should show no biological conflict to open the season back to over the counter harvest status.

PROPOSED BY: Anthony Marchini

(OI-F26-137)

Proposal 107

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.

What is the issue you would like the board to address and why?

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.

The BOG action banning nonresident Dall ram hunting in Unit 19C and subsequent drawing permit season should be rescinded.

Reopen seasons for resident and non-resident hunter for 1 full curl or 8 years of age or both horns broken. This is based on biology.

I quote Dr. Wayne Heimer, recognized as one of the premier Thin Horn Sheep biologists in North America in his previous proposal which clearly addressed the issues which have not changed:

Begin Dr. Heimer Quote:

"I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

BIOLOGY AND MANAGEMENT:

- 1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today's declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.*
- 2. This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.*
- 3. Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.*
- 4. The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.*

PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)

- 1. The apparent declines in Dall sheep populations have lead to the intuitive assumption that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.*
- 2. Sufficient concern over these intuitive assumptions was expressed to the Board of Game that it requested an informational meeting with Alaska's Dall sheep biologists and managers about the status of Dall sheep research and management last October. a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner's Office through the Department of Fish and Game. According to the established statutes, the Commissioner's Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.*

3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.
4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.
5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.
6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board-generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.
7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted. a. At this time, the total input from the “generating board” is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.
8. Subsequently, the board met in mid March to consider the board-generated proposal to close all Dall sheep in Unit 19C for five years.
9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass. a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim. i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK’s request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.
10. In an apparent effort to garner more board support (votes) for the (his or the Board’s?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting. a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.
11. The board approved the amendment, and moved to consider the amended proposal.
12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.
13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote

margin. a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.

14. As things stand at present, nonresident participation in mature Dall ram harvesting is scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt are still allowed by regulation.”

PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,

“... the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner’s Office.

a. Alaska law (AS 16. ARTICLE 1. Sec. 16.05.010.

Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME) says “The commissioner is the principle executive officer of the Department of Fish and Game.” 2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the. . . game resources of the state in the interest of the economy and general well-being of the state.” a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner’s obligation and authority to manage in the best interests of Alaska’s economy. 1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.

2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”

a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.

b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.

3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says:

“ . . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”

a. If use isn't maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident-free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

Wayne Heimer (EG-F23-266)” End Dr. Heimer Quote.

Hunting is a very emotionally charged and competitive topic. I am emotionally invested as anyone. However, emotion must not be allowed replace sound biological evidence. Biology does NOT support the closure or drawing permits for Dall Sheep in unit 19C.

Hunters have lost the use of a resource due to an unfounded BOG decision on an emotionally charged perception.

Mandatory education videos need to be required for licensing, like the Goat and Moose judging courses to aid in identifying legal and older animals. Helping to assure taking of old legal rams.

As a nearly lifelong Alaskan, I started hunting sheep 42 years ago in 19C. I have seen the ups and downs in population and the numbers of hunters in the field. The Alaska Range is my home. The last thing I want is to see our Dall sheep herd compromised. There is no data that supports a closure or draw in 19C. I believe we should manage our resources based on biology.

Rescind the closure and subsequent draw.

Sincerely,

Jeff Pralle

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Jeff Pralle

(OI-F26-172)

Proposal 108

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Return GMU 19C Dall Sheep season to historic season dates as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

GMU 19C Dall's Sheep Season. Aug 10 – Sept. 20, 2027. Residents and Non-Residents. One Full Curl Ram.

What is the issue you would like the board to address and why?

GMU 19C Dall's Sheep Season. Return it to historic season dates. All the time, expense, effort, and restrictions implemented since 2023 have not, and will not, put more sheep on the mountain.

Out of Cycle BOG Proposal 204 passed in March of 2023 after the same proposal had failed by a wide margin at the previous regularly scheduled Interior Cycle BOG meeting. There was a significant level of emotion which trumped proven science, leading to the passage of Proposal 204 at the out of cycle meeting held on the Kenai Peninsula. The Alaska Board of Game process represents the most democratic process of wildlife conservation in the world and Alaskans need to be able to believe in and trust the Board process to make scientific and constitutional based decisions.

The ensuing developments since have put proven science aside and pitted user groups against user groups in the drawn-out fight for who will and will not hunt Dall's sheep in GMU 19C.

As a conservationist, hunter, and professional guide, having spent nearly 3,000 days of the past 45 years of my life living with and documenting Dall's sheep populations in GMU 19C, I have seen nearly identical population swings over the years, due to hard winters and predator abundances. These cycles are normal and will continue to occur.

Full curl management of wild sheep naturally protects recruitment. Recruitment and genetics are both provided for by the sub-legal ram population.

Hunting within a full-curl management strategy does not affect recruitment.

As well, harvest and sealing records for 19C prior to 2023 clearly indicate that rams exceeding eight years of life were not being harvested annually.

Professional guides and resident hunters can easily determine harvest potential by paying attention to annual harvest reports, weather reports, sheep hunting media, and plan their outings accordingly.

Board of Game actions to manage predation at lower levels will do more than any other factor to help maintain sustained yield, abundance, and maximum benefit objectives. Then, when hard winters do occur, the populations are not already in low density equilibriums which require longer periods of time to naturally rebuild.

Most Alaskans love our wolves, but we do not love them in numbers that hold our precious prey species in low densities which does not allow for our given habitats to be utilized.

If the BOG follows the new pattern of wild sheep management it has started within GMU 19C, the burgeoning of the process will compound around the state and the negative fight for who does and who does not hunt will continue to degenerate hunting for future generations.

You can fix this now.

Recommendations:

1. Accelerate activation of already passed predator management initiatives within GMU 19C.
2. Reauthorize over the counter Dall's sheep hunting for residents and non-residents equally.
3. Develop and encourage maximum penalty for anyone harvesting sub-legal sheep.

What would happen if nothing is changed?

People's time, state expenses will continue to be lost. The negative fight for who will or will not hunt will continue. Mature rams will continue die of old age while professional guides try to explain to their clients in the field why. Resident and non-resident hunters will continue to lose hunting opportunity.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal and reasoning for it has been supported by numerous previously provided written and oral BOG testimonies from many people and entities including but not limited to, well known and respected Alaska wild

sheep biologists, wildlife biologists/managers, ADF&G, wild sheep support groups and related individuals, professional guides and their support groups, outdoor associations, and hunters in general.

PROPOSED BY: Robert Fithian DBA Taiga Resources Conservation (OI-F26-212)

Proposal 109

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Amend managment from full curl or larger to 3/4 curl or less for Rams in hunt DS196 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Residents: One ram with full-curl horn or larger – HT – August 10 – September 20
[DS196]

One ram with $\frac{3}{4}$ curl horn or less, excluding rams with both tips broken, by permit available online at hunt.alaska.gov or in person in McGrath and Nikolai beginning Sept. 29. Check in/out required due to small quota; aircraft prohibited; contact McGrath at (907)-524-3323. – RS380 – Oct. 1 – April 30.

Nonresidents: One ram with full-curl or larger every four regulatory years – HT – August 10 – September 20 [DS197 & DS198]

What is the issue you would like the board to address and why?

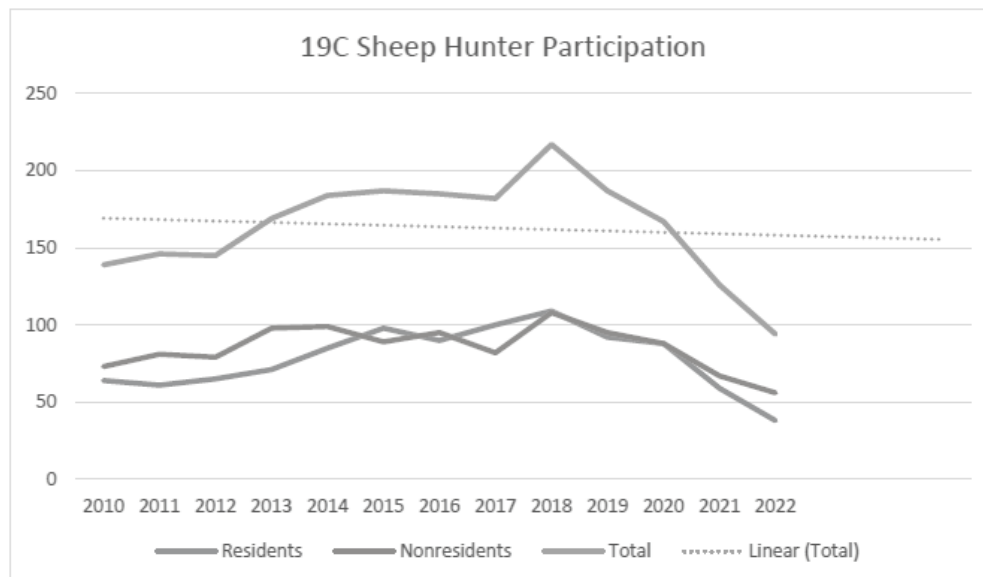
Reestablish a general season for Dall sheep in Unit 19C.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. Full-curl management is intended to preserve sheep hunting opportunity while conserving sheep. This regulation has allowed the department to have a longer hunting season and provides a chance for all to hunt a full curl ram. Full curl regulation has been the best management tool for over 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chance of survival diminishes within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams' makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Limiting harvest to full-curl rams ensures that the population's productivity is not affected by harvest.

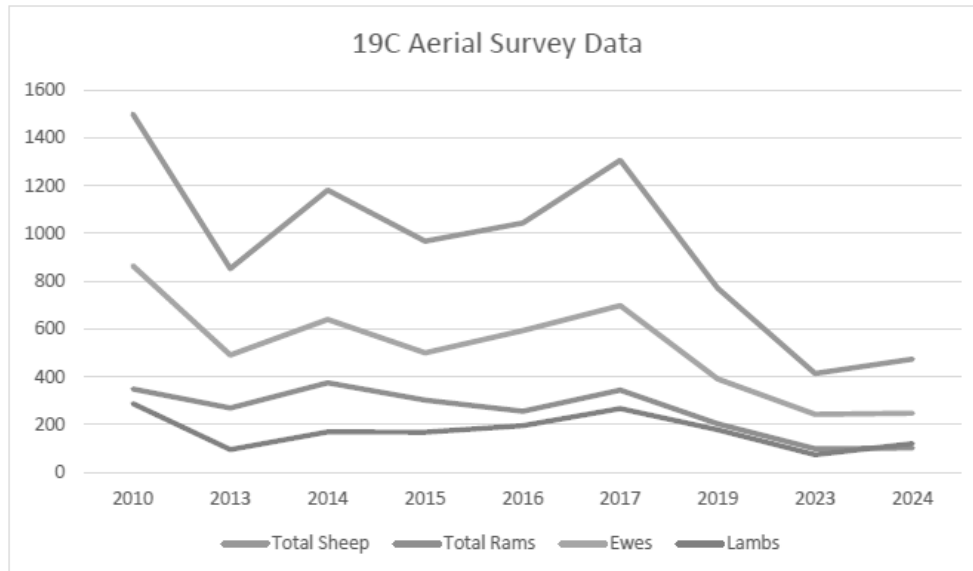
Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five-year period. Why? The short answer is self-regulation. ADF&G hunter participation records show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts on other areas of the state.

**Color Versions of the following tables can be found online at:*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>



Data pulled from ADF&G general harvest reports.



Data pulled from ADF&G Science Support Presentation to the Dall Sheep Working Group

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSED BY: Jeff Rost

(OI-F26-202)

Proposal 110

5 AAC 85.055; 92.085. Hunting seasons and bag limits for Dall sheep; Unlawful methods of taking game; exceptions.

Amend regulations for sheep hunting in Unit 19C to sheep may be taken by residents and nonresidents by bow and arrow only as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend regulations for sheep hunting in Unit 19C as follows:

In Unit 19C, sheep may be taken by residents and nonresidents by bow and arrow only.

What is the issue you would like the board to address and why?

Sheep populations in Unit 19C have declined in recent years, and the Board of Game has already taken restrictive management actions, including closure of the general season. These actions reflect concern about the sustainability of the population and the impact of harvest.

While closures and drawing permit hunts reduce harvest, they do so by substantially limiting or eliminating hunter opportunity. If the Board determines that reduced harvest is necessary, there

is an opportunity to achieve this objective through reduced harvest efficiency rather than reduced participation.

Archery hunting in alpine sheep habitat has a substantially lower success rate than rifle hunting. Restricting methods and means to archery equipment would be expected to significantly reduce overall harvest by reducing harvest efficiency, rather than by limiting participation.

An archery-only season would be expected to result in minimal harvest, similar to or lower than a closure, while restoring opportunity for hunters.

Compared to a full closure, an archery-only season would maintain opportunity for all hunters. Compared to a drawing permit hunt, it would provide substantially greater opportunity while likely resulting in equal or lower harvest levels due to reduced success rates.

Archery equipment is widely available and does not limit participation to a small or specialized group. Any hunter capable of participating in a sheep hunt can choose to hunt with bow and arrow equipment.

If no changes are made, management options may continue to rely on closures or drawing permits, both of which substantially reduce opportunity. This proposal offers an alternative approach that reduces harvest pressure while maintaining access for both resident and nonresident hunters.

This approach functions as a conservation tool that preserves opportunity while reducing harvest.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Paul Forward (OI-F26-215)

Proposal 111

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

What is the issue you would like the board to address and why?

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI351.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-148)

Proposal 112

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to "Up To" 10% of the available permits as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to "Up To" 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

What is the issue you would like the board to address and why?

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI352.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-150)

Proposal 113

5 AAC 85.010. Hunting seasons and bag limits for bison.

Restrict nonresident hunting for Bison in GMU 19 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Remove non-resident pool for Bison

What is the issue you would like the board to address and why?

I would like to see Bison to resident only. There is a short supply of draw tags for Bison within the state, and the resident pool of applicants far exceeds availability. There is a lot of availability for bison hunting in the lower 48 for nonresident pool. There is minimal revenue to the state based on nonresidents applying and successfully drawing the tag.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-039)

Proposal 114

5 AAC 85.045. Hunting seasons and bag limits for moose.

Make changes to allocations in hunts RM653, DM681, and DM682 based on 2 year average bull to cow ratios as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

The Farewell area is an important resource for Alaska residents looking to get their moose meat. Therefore, when the 2-year average bull-to-cow ratio is below the management objective minimum of 30 bulls:100 cows hunters should be limited by using: 1) a first-come-first-serve limited registration permit for residents (RM653), and 2) a draw hunt for non-residents (DM681/682). Allocation should be 90% residents and 10% non-residents. When the 2-year average bull:cow ratio is above 30:100 resident registration permits (RM653) will be unlimited, and nonresidents will remain under the current drawing hunt structure with 20 permits issued (DM681/682).

What is the issue you would like the board to address and why?

Overharvest of bull moose in Unit 19C in the Farewell area. Moose hunting pressure at Farewell steadily increased through RY23 while at the same time the bull:cow ratio was declining. In March 2020 the board created a registration permit (RM653) for both residents and nonresidents in the Farewell area to better track hunter effort and harvest. In March 2023 the board created a draw

hunt for nonresidents (proposal 205) to address crowding issues and reduce the amount of harvest. Since RY24 there has been an unlimited number of registration permits available to residents and 20 draw permits issued to nonresidents. While the crowding issues have largely been addressed, bull:cow ratios continue to decline. Therefore, in RY26 the department is only going to issue 100 registration permits (RM653) to residents (first-come-first-serve) and 10 draw permits (7 DM681 and 3 DM682) to nonresidents.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-173)

Proposal 115

5 AAC 85.045. Hunting seasons and bag limits for moose.

Amend hunts RM653, DM681, and DM682 to Unlimited Registration for Alaskan Residents and limited to 10 Draw Permits for Non-Residents as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Unlimited Registration for Alaskan Residents. 10 Draw Permits for Non-Residents. One Bull Per lifetime by Permit only for Non-Residents. "5" Non Resident permit to be allocated to Guides and "5" Non Resident Permits for the General Public. BOTH resident and Non Resident hunts for Moose to be held "Every Other Year" to ensure the Bull to Cow Ratio can be achieved and grow for Future Alaskan Hunters and youth.

What is the issue you would like the board to address and why?

Bull to Cow Ratio is at a "Critical" Low in the Farewell Area. Have hunted there for close to "30" years. We have to be "Stewards" of our precious Alaskan Resource. If we do not "ACT" swiftly and with no focus on ensuring the Bull to Cow ratio Improves, it will be a heartfelt disaster! We have to regulate ourselves for the Moose population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

I spoke with Hunters who I have shared Moose camp with at Farewell, both Resident and Non Resident Hunters. They 100% agree with the above Proposal for Farewell.

Robert McCaffrey, Chad McCaffrey, Lori McCaffrey, Paige McCaffrey, Grant Sullivan, Barb Eaton, Ben Eaton, Chris Diltz, Joey Diltz, Collin Pennington, Brian Wilson, Shane Wilson,

Stephen Olendorf, Neil Huey, Matt Huey, Mike Azerabeck, Mark Kasperg, Greg Kasperg, James Hunt, Jim Houschouer, Brooks Gehring, Warren Stough

PROPOSED BY: Robert McCaffrey (OI-F26-086)

**The following proposal was submitted with additional information and maps that can be reviewed on the Proposal Book webpage:*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Proposal 116

5 AAC 85.045; 92.069. Hunting seasons and bag limits for moose; Special provisions for moose and caribou drawing permit hunts.

Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents with up to 80 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents. 100 tags total. 80 % to residents and 20% to nonresidents (70% unguided and 30% guide required).

Suggested Regulation:

19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W

Residents – One bull - with spike-fork, 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM???** [RM653] September 1-20

Or

One bull - by permit available in person in McGrath and Nikolai beginning Jan 15; aircraft prohibited Jan 1-Feb 28. RM655. Feb 1-Feb 28.

Nonresidents – One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side DM681 (unguided, 70% of nonresident tags) & DM682 (guided, 30% of nonresident tags) September 1-20.

Nonresidents may only put in for DM681 or DM682, not both.

If nothing is done, the bull moose population will continue to be overharvested which will further depress the bull to cow ratio, causing a portion of the cow population to go unbred. If these trends continue, the department will have no choice but to implement further restrictions. Restrictions could include further limitations on both resident and nonresident opportunities, shortening the season, deleting the spike/fork regulation, or even an emergency closure or a combination of the aforementioned. Furthermore, the degradation of the land and increase of trash and debris on the Farewell strip and the surrounding area will continue to worsen.

What is the issue you would like the board to address and why?

I am concerned about the overall moose population of the Farewell area in 19C (RM653, DM681 & DM682) and believe regulations and/or restrictions are in order. I'm equally concerned about the blatant disregard shown by users of the Farewell airstrip, which is Federal Aviation Administration (FAA) lands, surrounding State lands, nearby Cook Inlet Regional Inc (CIRI) lands, Bureau of Land Management (BLM) lands, resources, and wildlife within the area. The amount of trash, fuel drums (empty and full), and All Terrain Vehicles (ATV) left at the taxiway and hidden in the bushes that hunters leave behind is appalling. There are more heavily hunted public lands in Alaska that are cleaner than the Farewell airstrip. The length of the airstrip, the many ATV trails and historic jeep trails that spider out from Farewell and its relative proximity to Anchorage, make it a popular moose hunting destination for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt.

Over the past three decades the moose seasons have been shortened and horn restrictions have been put in place to maintain a healthy moose herd. In 2010 a massive forest fire swept through the area burning over 81,000 acres. Coincidentally or not the past decade has seen an influx of moose hunters. While the fire created prime habitat for moose it inadvertently hurt them by destroying the area's dense cover, thus making it easier for hunters to visually spot moose and making it easier to traverse the area via ATV to pick off any and every legal bull within the area.

The Farewell registration hunt area (See exhibit 1) is comprised of 382 square miles and was created by the Board Of Game (BOG) 5 years ago in RY20 to achieve a more accurate grasp of the number of moose hunters and moose harvested within the Farewell area. See the table below that was provided by the Alaska Department of Fish and Game (ADF&G).

Farewell permit and harvest data for RY21 - RY25.

		Permits Issued	DNH	Hunted	Killed
2021	RM653	229	35	193	96
2022	RM653	224	25	198	104
2023	RM653	253	40	213	96
2024	RM653	124	24	100	62
	DM667	20	6	14	11
	2024 Total	144	30	114	73
2025	RM653	142	25	117	52
	DM681	14	4	10	10
	DM682	6	0	6	4
	2025 Total	162	29	133	66

Multiple proposals were submitted at the previous region 3 meeting to address the issues. The BOG passed and implemented a drawing (DM681 & DM682) for nonresidents in 2024 and 2025 of up to 20 permits. With the nonresident draw in place, the 2024 season saw a decrease from 213 participants to 114. However, in 2025 the number of resident participation increased 17%.

As seen in the table above, 2023 saw the largest number of permits issued at 253 with 213 actively participating in the hunt. That equates to 1 moose hunter for every 1.79 square miles

within the Farewell hunt area. Since the implementation of the non-resident draw in RY24, that changed to 1 moose hunter for every 2.87 square miles.

or a bit of perspective, the remainder of game management unit 19C saw 1 moose hunter for every 44 square miles and on average, the same number of bulls are harvested each year within this 382 square mile area as the remainder of the 6,328 square miles of unit 19C (See exhibit 2 with regards to 19C and the Farewell area highlighted within).

To get ahead of the rising resident participation and the declines in the bull-cow ratio, the department issued RM653 Farewell Moose Update on March 4, 2026 (Exhibit 3), which is to put residents on a limited registration hunt of 100 permits and reduce nonresident tags to 10 for RY26.

The department has found that the Farewell area moose population is migratory, based on a cow moose collar study. The study shows that much of the Farewell moose population spends the spring and summer months west of Farewell in unit 19D and migrates east to 19C in the late summer, early fall, spending the fall and winter there. Based on the 2024 Annual Report to the Alaska BOG on Intensive Management plan for Moose with Wolf, Black Bear, and Grizzly Predation Control in Game Management Unit (GMU) 19D East, one can easily conclude that there is a direct correlation between the moose in 19D East and those in the Farewell area. For example, after the removal of 109 bears in 2002 and 2003 in 19D East the number of moose increased across the board and the Farewell moose hunt became popular. The last couple of years have shown significant declines across the board in 19D East and Farewell. The data indicates that the bear population is back and having a direct impact on moose recruitment and thus, declines in harvest. Based on the report it indicates that another 100 or so bears need to be removed from 19D East again to help the moose population rebound and achieve the objective of 1.0 moose per square mile.

According to 2025 ADF&G survey, the bull to cow ratio is 21 to 100 in the Farewell area (See table below provided by ADF&G). According to the department, the ideal ratio is 30-35 bulls to 100 cows for the area and has not reached that standard in the past five years. To get the ratio back up, a cap needs to be put on the number of bulls harvested within the Farewell area.

Composition survey results from the Farewell TCA during 2017-2024.

Year	Total Moose	Total Calves	Total Bulls	Total Cows	Percent Calves	Calves: cows	Bull: Cow
2017	322	55	74	193	17%	28:100	38:100
2018	544	68	136	340	13%	20:100	40:100
2020	681	86	148	447	13%	19:100	33:100
2021	540	61	96	383	11%	16:100	25:100
2022	465	54	91	320	12%	17:100	28:100
2023	739	47	153	539	6%	9:100	28:100

Year	Total Moose	Total Calves	Total Bulls	Total Cows	Percent Calves	Calves: cows	Bull: Cow
2024	702	84	125	493	12%	17:100	25:100
2025	486	50	75	361	10%	14:100	21:100
2 Year Average					11%	16:100	23:100

Circumstances such as those the Farewell hunt area is experiencing now occurred in GMU Unit 24 and the northern section of GMU 21D along the Koyukuk River and could serve as case precedent for the Farewell area.

While Units 24 and 21D are much larger in scale and include multiple villages, the percentages of moose hunters versus successful harvest, and the increase in hunting pressure over a 10-year period, is similar. In 1988 the moose harvest success rate was 60%. Eleven years later, with 731 moose hunters, the success rate had dropped to 50%. In addition to human harvest, a significant increase in the area's wolf population took place during this time that took a large toll on the overall moose herd. The Koyukuk River Moose Management Plan (KRMMP) was developed in conjunction with ADF&G Division of Wildlife Conservation and the Koyukuk River Moose Hunters' Working Group (KMWG or working group). The BOG adopted regulatory proposals in the fall of 2000 that were spawned by the working group and in the 2001 spring meeting the BOG voted unanimously to support the process and endorse the KRMMP. The working group established a baseline maximum number of hunters based on moose biology concerns and what is considered a quality hunting experience. The general registration was changed to a draw hunt with separate resident and nonresident drawing pools. Separate draws were established to retain opportunity for nonresidents and commercial guides based on user group history. The working group met after the completion of the 2000 hunting season to review the regulation changes. Members of the working group all agreed that the season was greatly improved and that both local and nonlocal hunters enjoyed a higher quality hunt than in years past. A 2021 moose trend survey summary conducted by the Department of Interior Federal Subsistence Management Program through aerial survey shows a stable and healthy bull to cow moose population.

To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the Farewell area, I suggest establishing a moose draw permit for all user groups.

Based on the rich history of the area, from the 1940's Army air station, the pioneers of the guiding industry and the makeup of the historical user groups, I suggest the Farewell area go to a draw for both residents and nonresidents with up to 80 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents. 100 tags in total. The justification for 100 tags is based on the past 5 years of permits issued, permits used, and harvest data. This data indicates an estimated harvest of 44± bulls a year from the Farewell area. However, it can be expected that the harvest to be slightly higher due to the area being relatively small with lack of heavy cover and easy navigation via ATV.

The implementation of a moose draw for residents in the Farewell area will eliminate the subsistence opportunity during the fall hunting season. However, according to the reports by the ADF&G, only one participant from Ketchikan, one from Sitka and one from North Pole have participated in this hunt in the past five years (Exhibit 4). The report shows no one from the local region has participated in the hunt since the registration hunt was created. Only 5% of 19C's 6,710 square miles would be affected and the winter subsistence hunt RM655 for bull moose shall remain in place for a subsistence opportunity. To my knowledge, there are no year around residents of the area, and the nearest rural community lies 38 air miles away.

In closing, it's a supply and demand situation. The current demand for bull moose in the Farewell hunt area cannot be sustained with the current moose population and its downward trend. Recent regulation changes implementing a draw for non-residents are not enough. The bull to cow ratio continues to decline as does the calf recruitment, while the resident participation continues to increase. If the current users want to keep and maintain a 20-day season with the spike/fork, 50 inch, and or 4 brow point regulation, now is the time to put a cap on the number of hunters within the Farewell area before the area is shut down by Emergency Order.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Yes. I received moose data and the tables listed above from the ADF&G area biologist. I also reached out to the Vice Chairman of the McGrath advisory committee and was told that the committee has been in favor of a draw for quite a while. I was urged to submit the proposal, and they would look at it next winter.

PROPOSED BY: Spencer Pape

(OI-F26-061)

Proposal 117

5 AAC 85.045. Hunting seasons and bag limits for moose.

Transition to a fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Transition to a **fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C**

1. Unified Draw System

- Replace the resident registration system with a draw system
- Maintain separate applicant pools for residents, unguided nonresidents and guide required nonresidents.

2. Allocation Structure

- Establish a defined percentage split (eg. 70% resident / 25% unguided nonresident / 5 % guide required nonresident) rather than fixed tag numbers
- Adjust total permits annually based on population data

3. Outcome-Based Management

- Set annual tags based upon desired take of moose goals and actual harvest success rates
- Adjust allocation percentages annually based on:
 - Moose population data
 - Hunter success rates
 - Cow : Bull ratio
 - Cow : Calve ratio

Suggested Regulation:

19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W

Residents – One bull - with spike-fork, 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM653** [RM653] September 1-20

Or

One bull - by permit available in person in McGrath and Nikolai beginning Jan 15; aircraft prohibited Jan 1-Feb 28. **RM655**. Feb 1-Feb 28.

Nonresidents unguided – One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM681** September 1-20.

Nonresidents guide required - One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM682** September 1-20.

70% of the tags to residents / 25% to unguided nonresidents / 5% to guided nonresidents

Nonresidents may only put in for **DM681** or **DM682**, not both.

What is the issue you would like the board to address and why?

Subject:

Implementation of a Draw-Based Allocation System for Residents & Nonresident Moose Hunting Permits in Mixed-Use Public Lands in the Farewell **RM653** area of 19C

Executive Summary

This proposal recommends the implementation of a regulated draw system to allocate nonresident moose hunting permits in specific Alaska game management units where hunting

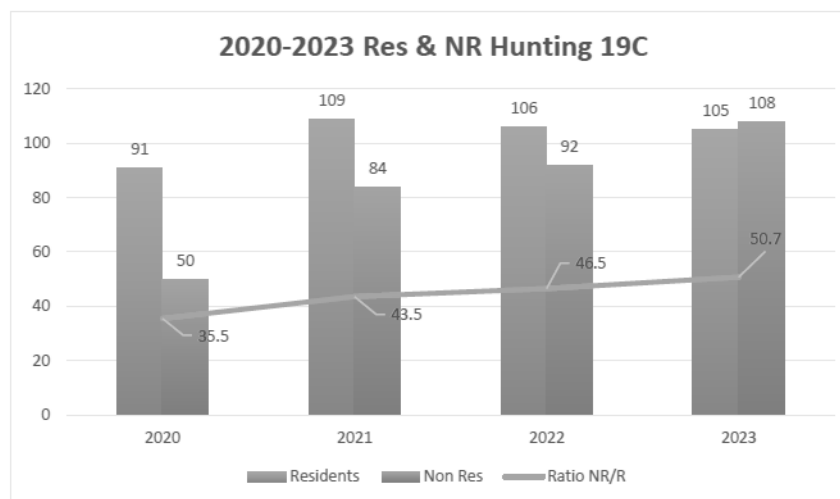
pressure is high and access is supported by federally funded infrastructure. The goal is to balance resident opportunity, maintain economic benefits from nonresident hunters, maintain the historical guiding industry of the area and ensure sustainable wildlife management aligned with established conservation principles.

Background and Justification

In the identified hunt area, RY26 current regulations allocate hunting opportunity as follows:

- Residents: 100 permits available through a limited registration system RM653
- Unguided Nonresidents: Limited to 7 permits issued through the draw system DM681
- Guide required Nonresidents: Limited to 3 permits issued through the draw system DM682

Despite this structure, historical hunt data, that before Nonresident draw was implemented, residents account for approximately **55%** of participation, while nonresidents account for **45%**.



Data from Alaska Dept of Fish and Game

A color version of this graph is available online at

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalboo>

This imbalance raises concerns regarding equitable access for Alaska residents, particularly in areas where:

- Access is facilitated by federally funded infrastructure including departing airports and the Farewell Airport
- Portions of the land are managed by the Bureau of Land Management

Because these lands and access points are supported by national public funding, they represent a shared resource. However, the State of Alaska retains the authority and responsibility to manage wildlife for the benefit of its residents while balancing broader public interests.

This hybrid approach may unintentionally produce inequitable outcomes and reduce transparency in allocation fairness. At the same time, nonresident hunters provide essential revenue through higher licensing fees and contribute to local economies through outfitters and guides currently offering services in 19C.

Although the current system heavily favors residents in permit allocation (100 resident permits vs. 10 non-resident tags), actual moose population show challenges from:

- Total moose population oscillation recently trending downward
- Bull to Cow ratio below 30:100 target
- Calving recruitment
- Grizzly, Black Bear and Wolf predation

Benefits of the Proposal

Balanced Access Ensures residents retain primary access while preserving opportunities for nonresidents

Resource Sustainability

Supports controlled harvest levels aligned with biological data

Fairness and Transparency

A draw system replaces uncertainty and perceived inequities with a clear, rule-based allocation process

Conclusion

This proposal offers a balanced, data-driven approach to moose hunting allocation in the Farewell area of 19C. By implementing a structured draw system, the Alaska Board of Game can ensure equitable access, sustain wildlife populations, and maintain the economic and conservation benefits associated with both resident and nonresident hunters.

Statement to the Board

The Alaska Board of Game is uniquely positioned to ensure that Alaska's wildlife resources are managed with both fairness and long-term sustainability in mind. The current system—combining a resident registration structure with a nonresident draw—creates inconsistent allocation methods and has resulted in disproportionate harvest outcomes despite significant differences in permit numbers. By transitioning to a unified draw system with clearly defined allocation percentages, the Board can improve transparency, align opportunity with actual harvest impact, and reinforce public confidence in the regulatory process. This approach maintains Alaska's commitment to resident access while still recognizing the economic and shared-use considerations tied to federally supported lands and access infrastructure.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No.

PROPOSED BY: Thomas Jones

(OI-F26-129)

Proposal 118

5 AAC 85.045. Hunting seasons and bag limits for moose.

Change bag limit in RM653 to One bull every two regulatory years with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

I would like to recommend a change to the bag limit for the RM653 hunt in Unit 19C. There would be no change to antler restrictions or season dates, but if a resident hunter harvests a moose under RM653, they would be ineligible to receive an RM653 permit the next year. There would be no changes to the nonresident permit hunt because they already can't get a permit 2 years in a row under the drawing permit rules.

RM653 Proposed language: One bull **every two regulatory years** with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side by permit available online at hunt.alaska.gov, or in in person in McGrath, Anchorage, Fairbanks and Palmer, beginning August 1

What is the issue you would like the board to address and why?

Overharvest of bull moose in Unit 19C in the Farewell area. Moose hunting pressure at Farewell steadily increased through RY23 while at the same time the bull:cow ratio was declining. In March 2020 the board created a registration permit (RM653) for both residents and nonresidents in the Farewell area to better track hunter effort and harvest. In March 2023 the board created a draw hunt for nonresidents (proposal 205) to address crowding issues and reduce the amount of harvest. Since RY24 there has been an unlimited number of registration permits available to residents and 20 draw permits issued to nonresidents. While the crowding issues have largely been addressed, bull:cow ratios continue to decline. Therefore, in RY26 the department is only going to issue 100 registration permits (RM653) to residents (first-come-first-serve) and 10 draw permits (7 DM681 and 3 DM682) to nonresidents.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No, except that the McGrath Area Management Biologist was consulted for background proposal language.

PROPOSED BY: Steve Chronic

(OI-F26-089)

Proposal 119

5 AAC 85.045. Hunting seasons and bag limits for moose.

Reduce Season to Sept 1 – Sept 15 for Moose Permit RM653 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Moose 19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W (Farewell Area), Permit RM653, Reduce Season to Sept 1 – Sept 15.

What is the issue you would like the board to address and why?

Over the past 5 years the department has issued an unlimited number of RM653 permits. Beginning in 2024, the BOG significantly reduced nonresident hunters in the Farewell area from approximately 100 hunters to 20 hunters. This BOG action was taken in an effort to both improve the bull cow ratio and to reduce user conflicts. After two seasons of reduced hunting effort the, bull cow ratio continues to decline below ADFG population objective.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Consulted several Alaska residents who hunt in the unit. Most agree a shorter season could help reduce take allowing the population to recover from over harvest.

PROPOSED BY: Brad Hinkes

(OI-F26-117)

Proposal 120

5 AAC 85.045. Hunting seasons and bag limits for moose.

Amend Moose hunt under Permit RM653 to a Quota Hunt as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Moose 19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W (Farewell Area), Permit RM653 (unlimited permits issued), Quota Hunt, Sept 1 – Sept 20. Successful permit holders are required to report harvest within 12hrs of take to ADFG. Hunt will be closed by Emergency Order when the quota has been reached.

What is the issue you would like the board to address and why?

Over the past 5 years the department has issued an unlimited number of RM653 permits. Beginning in 2024, the BOG significantly reduced nonresident hunters in the Farewell area from approximately 100 hunters to 20 hunters. This BOG action was taken to both improve the bull cow ratio and to reduce user conflicts. After two seasons of reduced hunting effort, the bull cow ratio continues to decline below ADFG population objective.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Consulted several Alaska residents who have hunted this area for many years. We believe this proposal would allow ADFG to best control over moose take in the permit area, prevent continued over harvest, allow the moose population to recover, while providing an opportunity for all hunters to participate in the hunt. Many camps and transporter schedule 2 hunt periods to accommodate 2 groups of hunters during the 20-day

season. With an Emergency closure likely to occur before the 20th, a 2nd hunt party is less likely to occur, reducing take.

PROPOSED BY: Cynthia Hinkes

(OI-F26-139)

Proposal 121

5 AAC 92.150. Evidence of sex and identity.

Change salvage rules for antlers with a spread of 55" or more as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Page 22

In hunts with antler/horn restrictions, antlers/horns must be salvaged and may not be altered unless required by permit conditions. Antlers must remain naturally attached to the unbroken/uncut skull plate if the required number of brow tines are not [AREN'T] present unless the animal has a spread of 55" or more.

Page 30 (in bold)

Antlers must be salvaged where there are antler restrictions; such antlers must remain naturally attached to the unbroken or uncut skull plate if the required number of brow tines are not present unless antler spread is 55" or more. If antlers must be salvaged, they may not be altered prior to completion of all salvage requirements unless antler spread is 55" or more.

What is the issue you would like the board to address and why?

A moose which is clearly legal by spread should not be subject to brow tine restrictions or skull plate/antler alterations.

Justification:

Safety: Large sets of antlers can be very difficult to transport particularly in small planes where they often become dangerous external loads by necessity.

Economics: Large sets of antlers have negative economic impacts on transportation costs to the hunter due to bulk, particularly in aviation.

Taxidermy: Current industry standards can reconstruct animals skull/antlers to their natural state.

Regulations: Page 30 of current regulations state: "However, if the antlers are 50 or more inches wide, it doesn't matter how many brow tines are present, the moose is legal."

The intent of the current 50"/brow tine restriction regulations exist to assess moose antler spread BELOW 50", NOT over 50". It is reasonable to believe the field reconstruction of an altered skull plate and/or antlers of a bull moose 55" or greater would be sufficient to justify a legal moose by spread alone.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Yes. Several discussions with a former Fish and Wildlife employee and also a former Board of Game member through Michael Litzen of Litzen Guide Service.

Lastly, though I have applied this to 19C/Interior-Arctic regions it may well need to be considered state wide.

PROPOSED BY: Lex Patten

(OI-F26-030)

Proposal 122

5 AAC 85.045. Hunting seasons and bag limits for moose.

Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653.

Request the Subsistence Division to assist the Board do come up an Amount Necessary for Subsistence

(ANS). Scoring should be based on land ownership within the unit, number years hunting/eaten meat from the unit and years as an Alaska resident.

What is the issue you would like the board to address and why?

I have been going to Farewell for 48 years. In 1981, I staked 25 acres through the State's Remote Parcel Program within RM653 hunt area. Over time, I built a cabin, outbuildings, and a runway.

My family spends 4–6 weeks there each year from May through September. I harvested my first moose in 1980, and we have taken one at Farewell every year since, along with caribou, bison, sheep, and both black and brown bear. Farewell is more than a hunting area—it is a central part of our lives, and protecting its resources is a top priority.

Over the decades, I've seen major changes. In the 1980s, hunters were scarce, and the season ran through October 10. Today, it is a limited registration hunt. While ADFG has managed harvests well, moose numbers continue to decline despite restrictions. As a long-time subsistence user, I am concerned our opportunity to harvest moose is at risk. Others who have hunted here for 20–30 years face the same issue. I ask the Board to protect long-term subsistence users until the population recovers.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Consulted several Alaska residents/long term users of the unit. All who I spoke to were in favor of this proposal.

PROPOSED BY: Michael Hinkes (OI-F26-059)

Proposal 123

5 AAC 85.045. Hunting seasons and bag limits for moose.

Shift the season dates for all moose hunters in Unit 21A from September 5-25th to September 1-20 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

The McGrath AC would like to shift the season dates for all moose hunters in Unit 21A. Currently the season is September 5-25th and this proposal would make the season September 1-20. This change will maintain 20 days of opportunity, and two 10-day hunt periods which is important to guides and transporters. We anticipate an earlier season end date will result in a small reduction in harvest which should stop the decline in the bull to cow ratio.

(19)

Unit 21(A) RESIDENT HUNTERS: 1 antlered bull by registration permit only **Sept. 1 – Sept. 20** [SEPT. 5 - SEPT. 25] NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by registration only **Sept. 1 – Sept. 20** [SEPT. 5 - SEPT. 25]

What is the issue you would like the board to address and why?

Overharvest of bull moose in Unit 21A. Moose hunting pressure in unit 21A has been steadily increasing over the last 10 years, while at the same time the bull:cow ratio has been declining. The McGrath AC would like to reduce harvest slightly in an effort to stop this decline and ensure the bull:cow ratio remains above 25 bulls:100 cows.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-177)

Proposal 124

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during part of February and March in Unit 21E as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

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

Unit 21(E)

...

RESIDENT HUNTERS:

...

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

Feb 15 – Mar 15

...

What is the issue you would like the board to address and why?

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The goal of reauthorizing is to provide additional harvest opportunity and meet harvest objectives.

The most current survey results from 2025 indicated there are approximately 11,400 moose in Unit 21E, which is slightly above the intensive management (IM) population objective of 9,000–11,000 moose. Based on the population estimate of 11,400 moose, there is currently a harvestable surplus of approximately 450 moose; however, many of those moose are not accessible in the fall.

Approximately 200 moose are harvested each fall along the rivers. The most recent fall composition survey in 2024 showed 33 bulls per 100 cows and 41 calves per 100 cows. The IM harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 2.0 moose/mi² in 2025. Twinning surveys were conducted in 2024 and 2025 in the Holy Cross area, and the average twinning rate for those 2 years was 41%. Browse utilization remains high in the Holy Cross area where the population density is highest and winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure temporally and allow access to areas inaccessible in the fall.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-018)

Proposal 125

5 AAC 85.045. Hunting seasons and bag limits for moose.

Extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit to Feb 15th – March 31st as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

The GASH AC would like to extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit. Currently the season is Feb 15th – March 15th, and this proposal would make the season Feb 15th – March 31st. This change will provide an extra two weeks of hunting opportunity during a period that typically experiences warmer weather, and improved snow conditions for travel. We anticipate this change may improve the harvest on the RM837 permit, which is extremely low (average = 7.3 moose/year). The most recent population estimate (2025) for 21E is above the IM objective range of 9,000-11,000, which supports the liberalization of the winter moose hunting season.

(19)

Unit 21(E) RESIDENT HUNTERS: 1 moose by registration permit only, a person may not take a cow accompanied by a calf **Feb. 15 – Mar. 31** [FEB. 15 - MAR. 15] NONRESIDENT HUNTERS: No open Season

What is the issue you would like the board to address and why?

Weather (extreme cold) and snow levels often make the Feb 15 – Mar 15 difficult for residents of the GASH (Grayling, Anvik, Shageluk, and Holy Cross). Extending the season for an additional two weeks to the end of March would provide more opportunities to harvest moose for residents that were unable to harvest during the fall season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed by the GASH AC and was unanimously supported.

PROPOSED BY: Grayling/Anvik/Shageluk/Holy Cross (GASH) Fish & Game Advisory Committee
(OI-F26-170)

Proposal 126

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Amend Bear baiting in Unit 19 to two seasons July 1 - Oct 31 / Apr 1 - Jun 30 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

With the cost of fuel going up in the past few years and also with current fuel prices and possibility of fuel going up even higher for boat gas, the Bethel AC has proposed a change in season dates for Bear Baiting in Unit 19. With these new dates, it will put less stress on the hunters / subsistence users for with-in Unit 19, especially when the hunters / subsistence users have to remove their bear bait equipment and put it back up with-in 30 days.

Bear Baiting New Proposed Dates -----July 1st -Oct 31st / Apr 1st – June 30th

What is the issue you would like the board to address and why?

The Bethel AC would like to Propose a change of Season Dates for Unit 19 Bear Baiting. With the current regulations the Hunter / Subsistence User is required to pull their Bear Baiting Sites by June 30 and if they want to Bear Bait again, they have to wait until Aug 1st to do so. The amount of time that is put to get the sites setup is time consuming. With there being a No Closed Season for Brown and Black Bears the Hunters / Subsistence User will have a better opportunity for taking bears that are in season for Bear Baiting.

Unit 19 Bear Baiting Season -----Aug 1st to Oct 31st / Apr 15th – June 30th

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Bethel Advisory Committee (OI-F26-068)

Proposal 127

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations.

What is the issue you would like the board to address and why?

Currently, there is no open small game hunting season for beaver in Unit 19, while the neighboring Unit 18 allows year-round harvest with no bag limit. This inconsistency in regulations creates unnecessary restrictions for residents of Unit 19, particularly those who rely on beaver as a subsistence food source.

Beaver have a long history of use in Alaska for both their meat and fur. Under current regulations, residents of Unit 19 are prevented from harvesting beaver opportunistically for food when they encounter them outside of trapping seasons. This limits access to a valuable subsistence resource and creates confusion between adjacent units with similar ecological conditions.

If no change is made, Unit 19 residents will continue to face unnecessary barriers to harvesting beaver for food, despite healthy populations and more liberal regulations in neighboring Unit 18. Aligning regulations would improve subsistence opportunity and regulatory consistency without negatively impacting the resource.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-083)

Proposal 128

5 AAC 84.270. Furbearer trapping

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit.

What is the issue you would like the board to address and why?

Currently, trapping season for beaver in Unit 19 has a season from Sept 1-June 10, while the neighboring Unit 18 allows year-round harvest with no bag limit. This inconsistency in regulations creates unnecessary restrictions for residents of Unit 19, particularly those who rely on beaver as a subsistence food source.

Beaver have a long history of use in Alaska for both their meat and fur. Under current regulations, residents of Unit 19 are prevented from harvesting beaver for food by trapping them. This limits access to a valuable subsistence resource and creates confusion between adjacent units with similar ecological conditions.

If no change is made, Unit 19 residents will continue to face unnecessary barriers to harvesting beaver for food, despite healthy populations and more liberal regulations in neighboring Unit 18. Aligning regulations would improve subsistence opportunity and regulatory consistency without negatively impacting the resource.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-082)
