ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS FOR PROPOSALS 1-23, 25-27, 29-38, 45-46, 51-54, 64-67, 70-79, and 81-84

CENTRAL / SOUTHWEST REGION PROPOSALS

ALASKA BOARD OF GAME MEETING

WASILLA, ALASKA

JANUARY 10-17, 2025

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

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

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal will reauthorize the brown bear tag fee exemptions in Units 9, 11, 13, 16, and 17.

WHAT ARE THE CURRENT REGULATIONS? The following regulations are currently in effect for Region IV brown bear hunts:

5AAC 92.015. Brown bear tag fee exemption

(a) A resident tag is not required for taking a brown bear in the following units:

(1) Unit 11;

(2) Units 13 and 16A;

(3) Units 16B and 17;

…

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9B, within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9C, within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9D, within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9E, within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a

brown bear in the following units:

(1) Unit 9B;

(2) Unit 9E, that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Units 9D and 9E;

(3) Unit 17;

….

There is a positive customary and traditional use finding (C&T) for brown bears in those portions of Units 17A and 17B that drain into the Nuyakuk and Tikchik lakes, with an amount reasonably necessary for subsistence (ANS) of 5 bears. There is a positive C&T finding for brown bears in the remainder of Unit 17B, and in Unit 17C, with an ANS of 10–15 bears.

There is a positive C&T finding for brown bear in Unit 9B, with an ANS of 10–20 bears, and a positive C&T finding in 9E, with an ANS of 10–15 bears. The remainder of Unit 9 has a negative C&T finding.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters will not be required to purchase a brown bear locking tag before hunting brown bears in Units 11, 13, 16, and 17. In addition, brown bear tag fees will not be required for subsistence hunts in Units 9 and 17 or for permit hunts near communities in Unit 9.

BACKGROUND: Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The Board liberalized brown bear hunting regulations, including the tag fee exemption, to increase the opportunity to take brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these Units provides greater opportunity to harvest brown bears by allowing opportunistic take.

The board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities during the March 2011 Board of Game meeting. Brown bears are abundant in Unit 9 and are managed as a trophy species. Brown bears are frequently observed in communities destroying property in search of food or garbage and occasionally killing pets. The liberalized bear seasons and bag limits along with the elimination of the tag fee is intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of DLP bears.

Subsistence Brown Bear Hunts: The Board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9.

Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal because it provides greater sustainable harvest opportunity in Units 11, 13, 16, and 17; addresses public safety concerns in Unit 9; and supports subsistence harvest opportunity in portions of Units 9 and 17.

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

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

PROPOSED BY: Bethel Advisory Committee

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

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

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

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

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

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

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

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

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

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

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

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

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

* No take of brown bears allowed at bait stations.

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

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

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

PROPOSED BY: Caleb Martin

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

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

5 AAC 92.080. Permit for hunting bear with the use of bait or scent lures.
The following methods of taking game are prohibited:
…
(7) with the aid of
…

(G) any device that has been airborne, controlled remotely, or communicates wirelessly, and is used to spot or locate game with the use of a camera or video device;
(H) any camera or other sensory device that can send messages through wireless communication;
….

5 AAC 92.044(b)(13). Unlawful methods of taking big game; exceptions.
In Units…9,…11,…13, 14(A)&(B),…16, and 17…a hunter who has been airborne may take or assist in taking of a black bear at a bait station with the use of bait or scent lures under a permit issued by the department, and if the hunter is at least 300 ft. from the airplane at the time of taking; in Units…11,…13, 14(A)&(B),…16,…a hunter who has been airborne may take or assist in taking of a brown bear at a bait station with the use of bait or scent lures under a permit issued by the department, and if the hunter is at least 300 ft. from the airplane at the time of taking;
…

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

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

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

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

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

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

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

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

PROPOSED BY: Paul Forward

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

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

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

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

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

Harvested rams must be sealed within 30 days of kill.

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

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

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

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

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

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

* Take includes any-ram harvest.

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

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

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

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

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

PROPOSED BY: Jordan Wallace

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

WHAT ARE THE CURRENT REGULATIONS?

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

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

NONRESIDENT HUNTERS:

2 bulls		Aug. 1 - Sept. 30

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

RESIDENT HUNTERS:

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

NONRESIDENT HUNTERS:

2 bulls		Aug. 1 - Sept. 30

If the harvestable portion
is greater than 550

RESIDENT HUNTERS:

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

NONRESIDENT HUNTERS:

2 bulls		Aug. 1 - Sept. 30

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

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

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

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

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

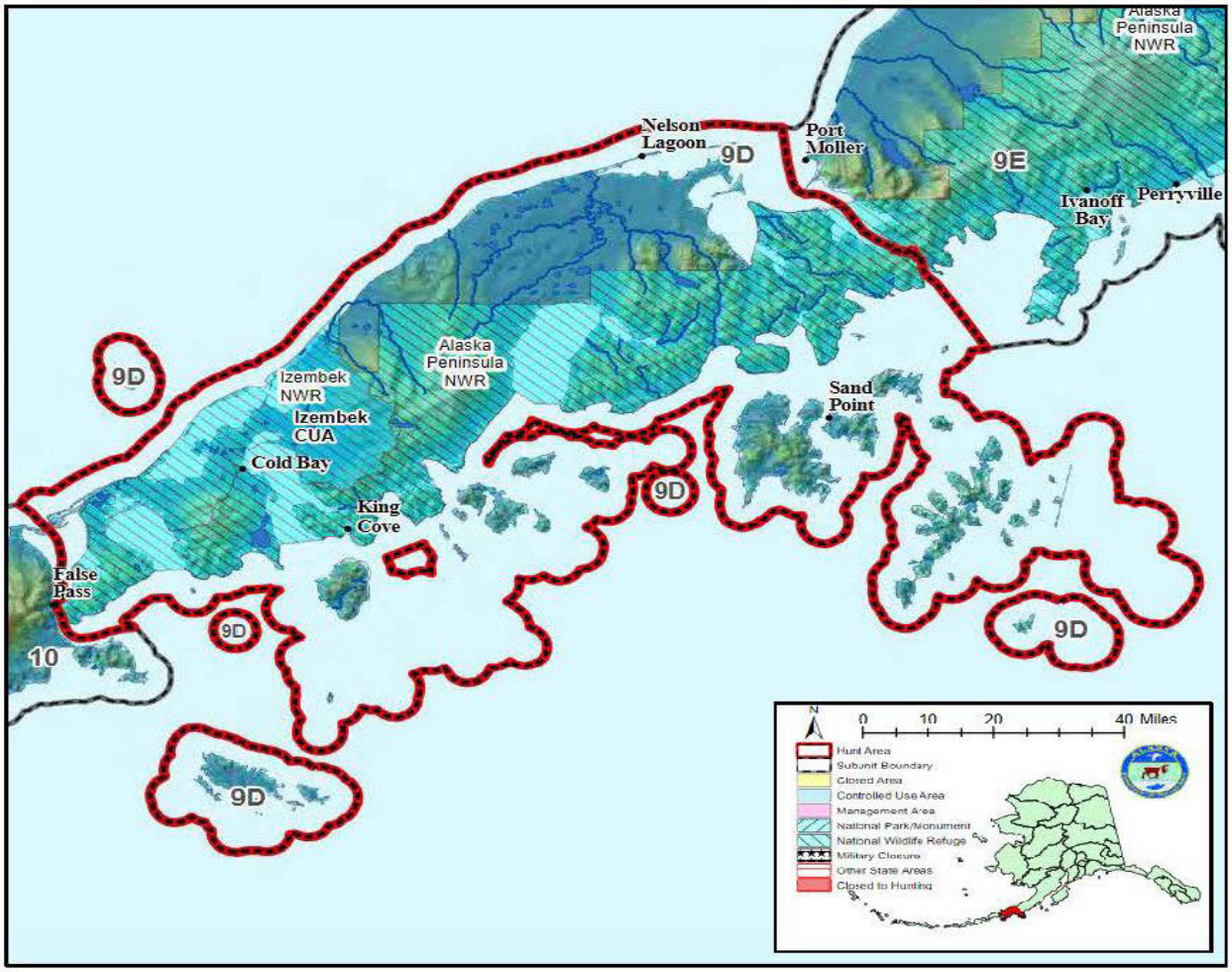

Figure 5-1. Southern Alaska Peninsula caribou herd range within Unit 9D.

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

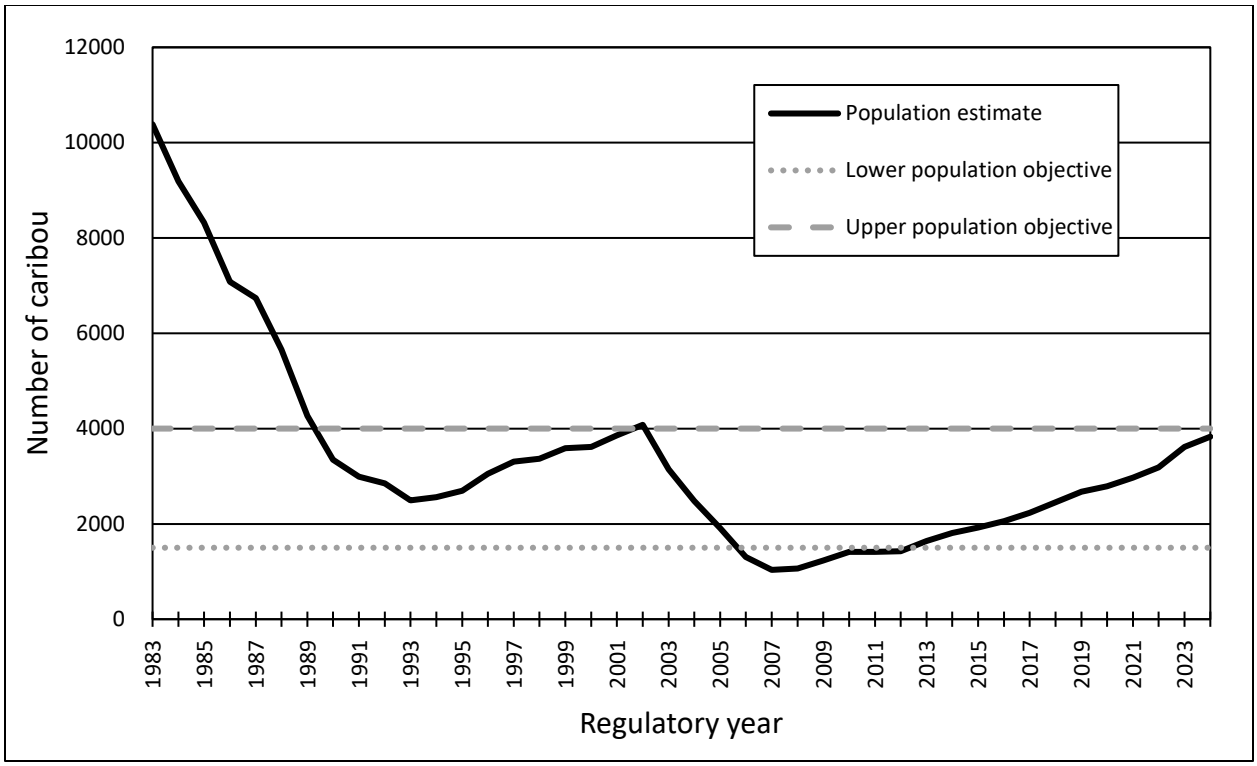

Figure 5-2. Population estimates for the Southern Alaska Peninsula caribou herd, regulatory years 1983–2024.

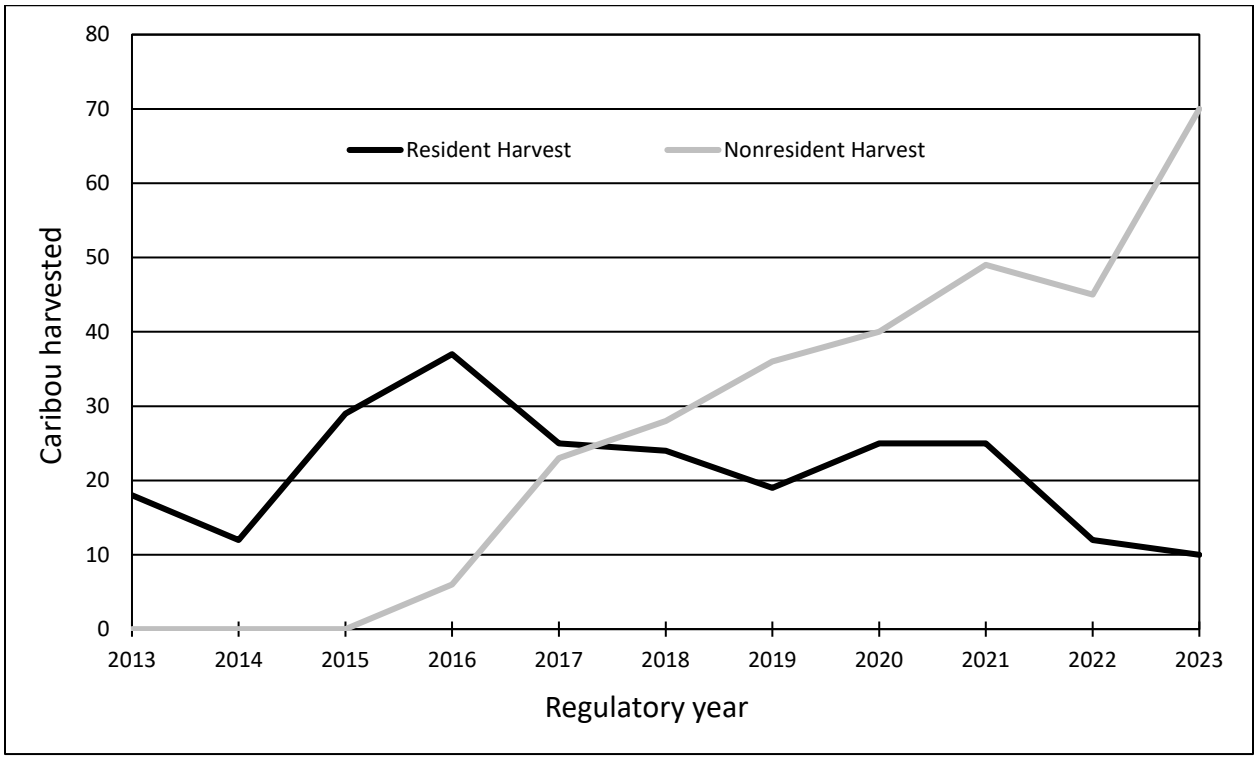

Figure 5-3. Number of reported caribou harvested by residents and nonresidents from the Southern Alaska Peninsula caribou herd, regulatory years 2013–2023.

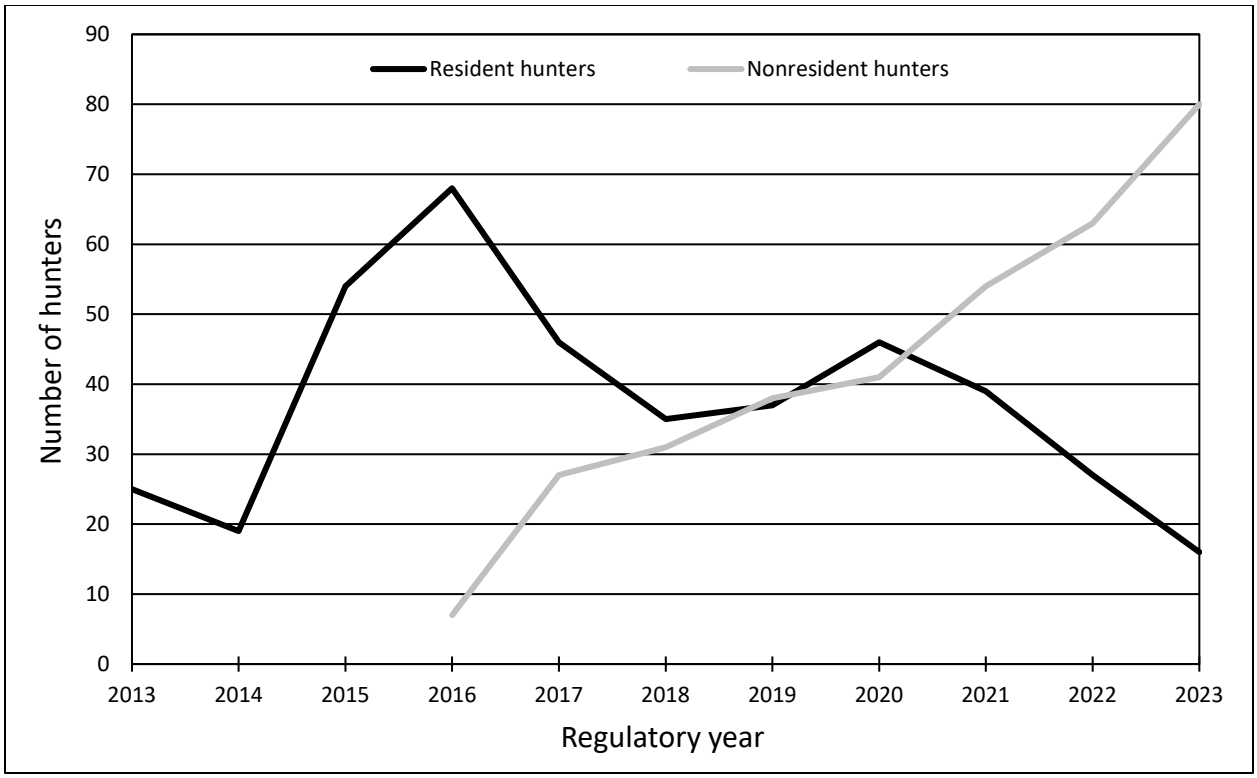

Figure 5-4. Number of resident and nonresident caribou hunters in Unit 9D, regulatory years 2013–2023.

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

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

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

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

PROPOSED BY: Dave Leonard

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

WHAT ARE THE CURRENT REGULATIONS?

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

NONRESIDENT HUNTERS:
2 bulls Aug. 1 - Sept. 30

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

RESIDENT HUNTERS:
3 caribou Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls Aug. 1 - Sept. 30

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

RESIDENT HUNTERS:
4 caribou Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls Aug. 1 - Sept. 30

If the harvestable portion
is greater than 550

RESIDENT HUNTERS:
5 caribou Aug. 1 - Sept. 30
Nov. 15 - Mar. 31

NONRESIDENT HUNTERS:
2 bulls Aug. 1 - Sept. 30

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

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

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

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

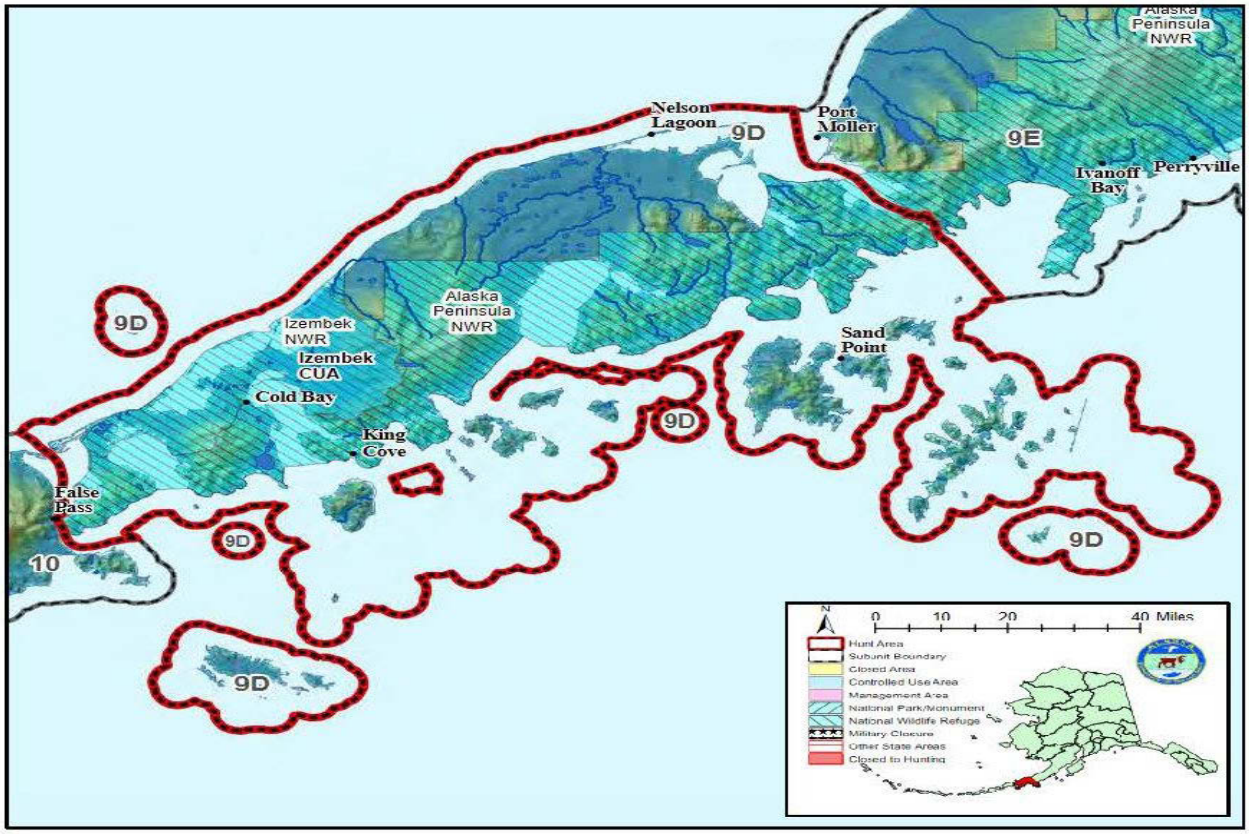

Figure 6-1. Southern Alaska Peninsula caribou herd range within Unit 9D.

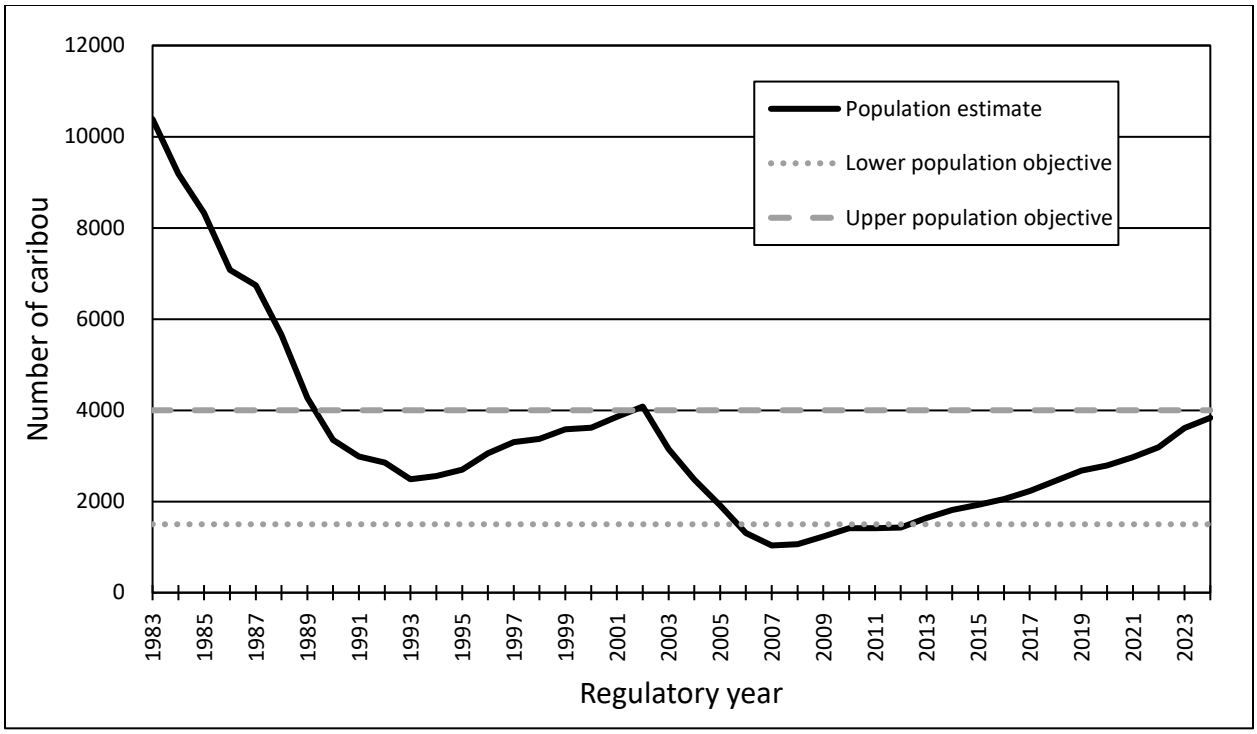

Figure 6-2. Population estimates for the Southern Alaska Peninsula caribou herd, regulatory years 1983–2024.

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

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

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

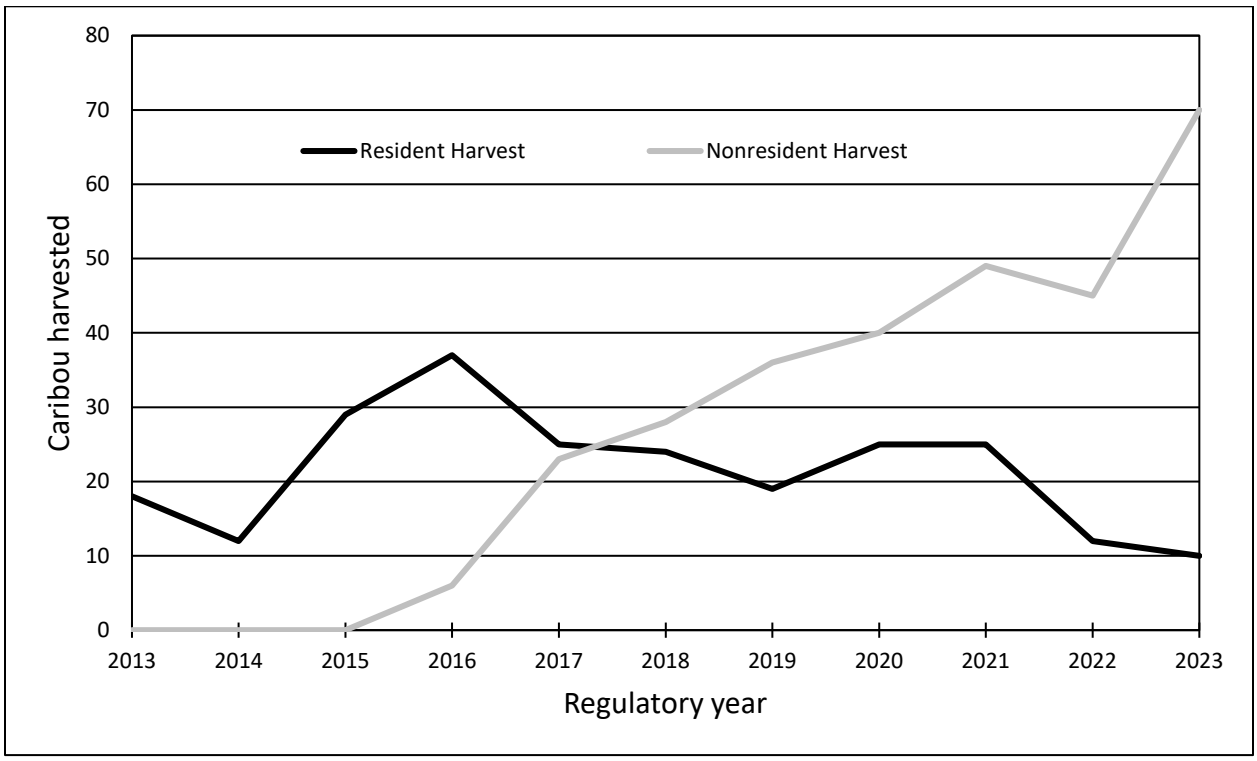

Figure 6-3. Number of reported caribou harvested by residents and nonresidents from the Southern Alaska Peninsula caribou herd, regulatory years 2013–2023.

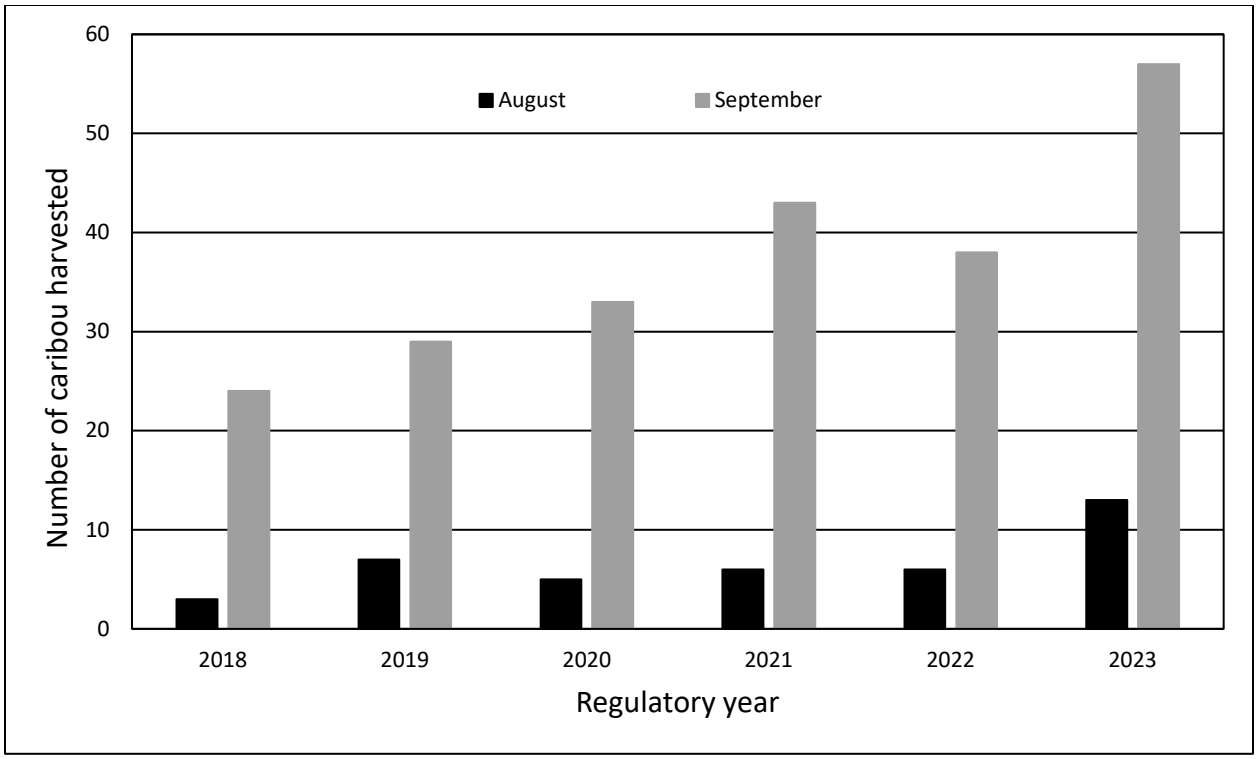

Figure 6-4. Number of caribou harvested by nonresident hunters in Unit 9D during August and September, regulatory years 2018–2023.

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

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

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

PROPOSED BY: Alaska Department of Fish and Game

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

WHAT ARE THE CURRENT REGULATIONS?

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

	Nov. 15 - Mar. 31
NONRESIDENT HUNTERS:	
2 bulls	Aug. 1 - Sept. 30
If the harvestable portion is greater than 250, but less than 451 caribou:	
RESIDENT HUNTERS:	
3 caribou	Aug. 1 - Sept. 30 Nov. 15 - Mar. 31
NONRESIDENT HUNTERS:	
2 bulls	Aug. 1 - Sept. 30
If the harvestable portion is greater than 450, but less than 551 caribou:	
RESIDENT HUNTERS:	
4 caribou	Aug. 1 - Sept. 30 Nov. 15 - Mar. 31
NONRESIDENT HUNTERS:	
2 bulls	Aug. 1 - Sept. 30
If the harvestable portion is greater than 550	
RESIDENT HUNTERS:	
5 caribou	Aug. 1 - Sept. 30 Nov. 15 - Mar. 31
NONRESIDENT HUNTERS:	
2 bulls	Aug. 1 - Sept. 30

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

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

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

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

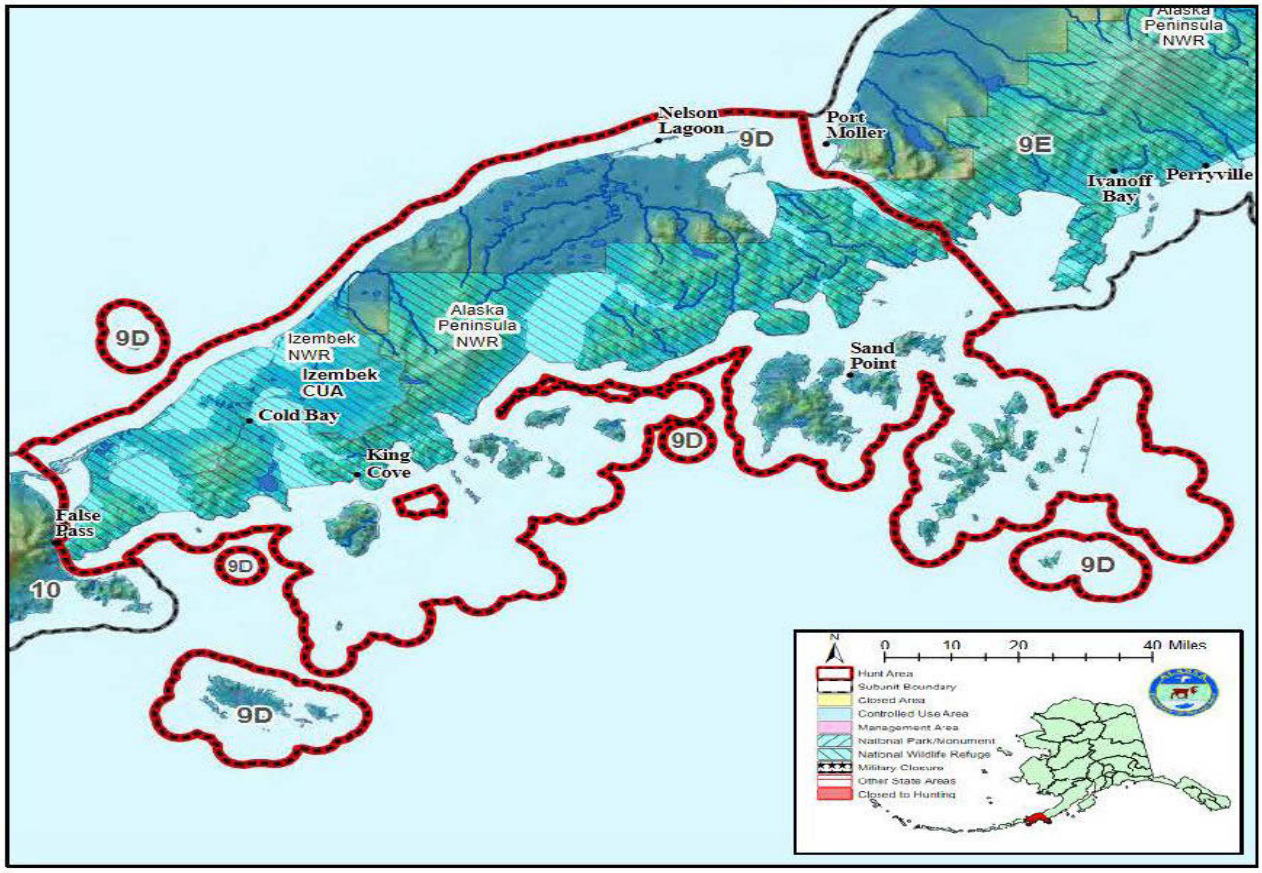

Figure 7-1. Southern Alaska Peninsula caribou herd range within Unit 9D.

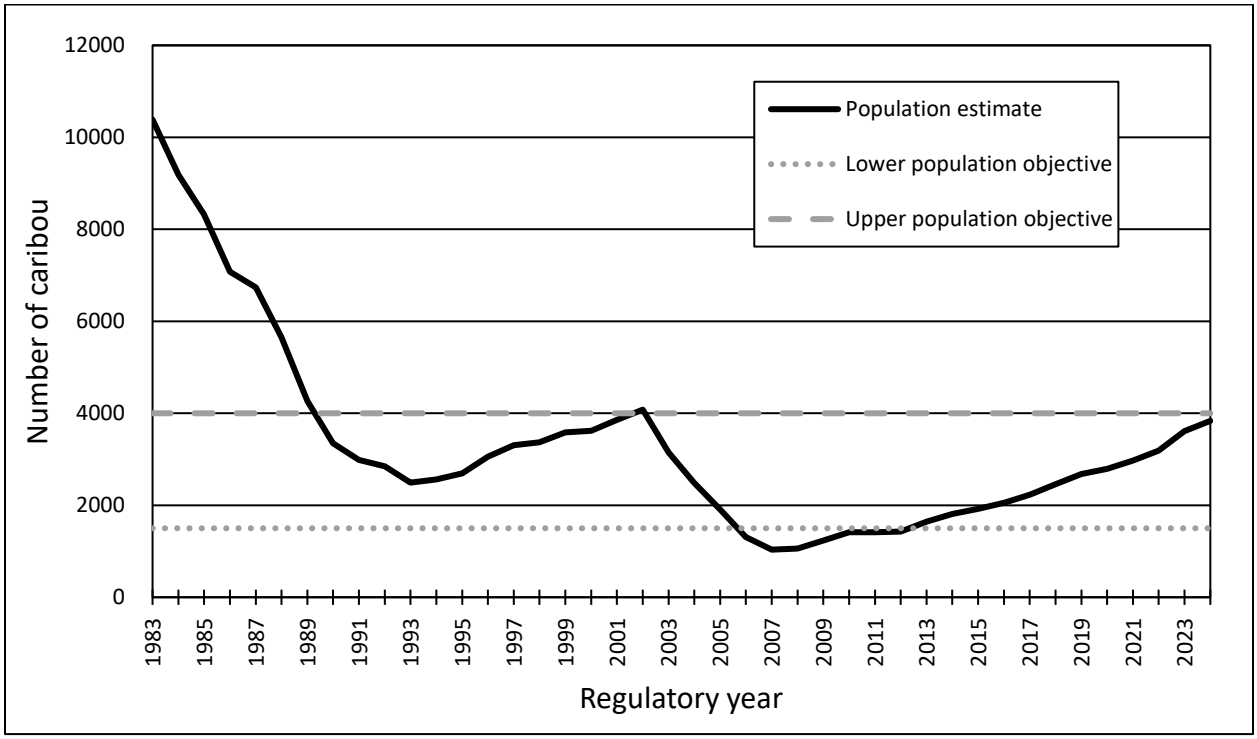

Figure 7-2. Population estimates for the Southern Alaska Peninsula caribou herd, 1983–2024.

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

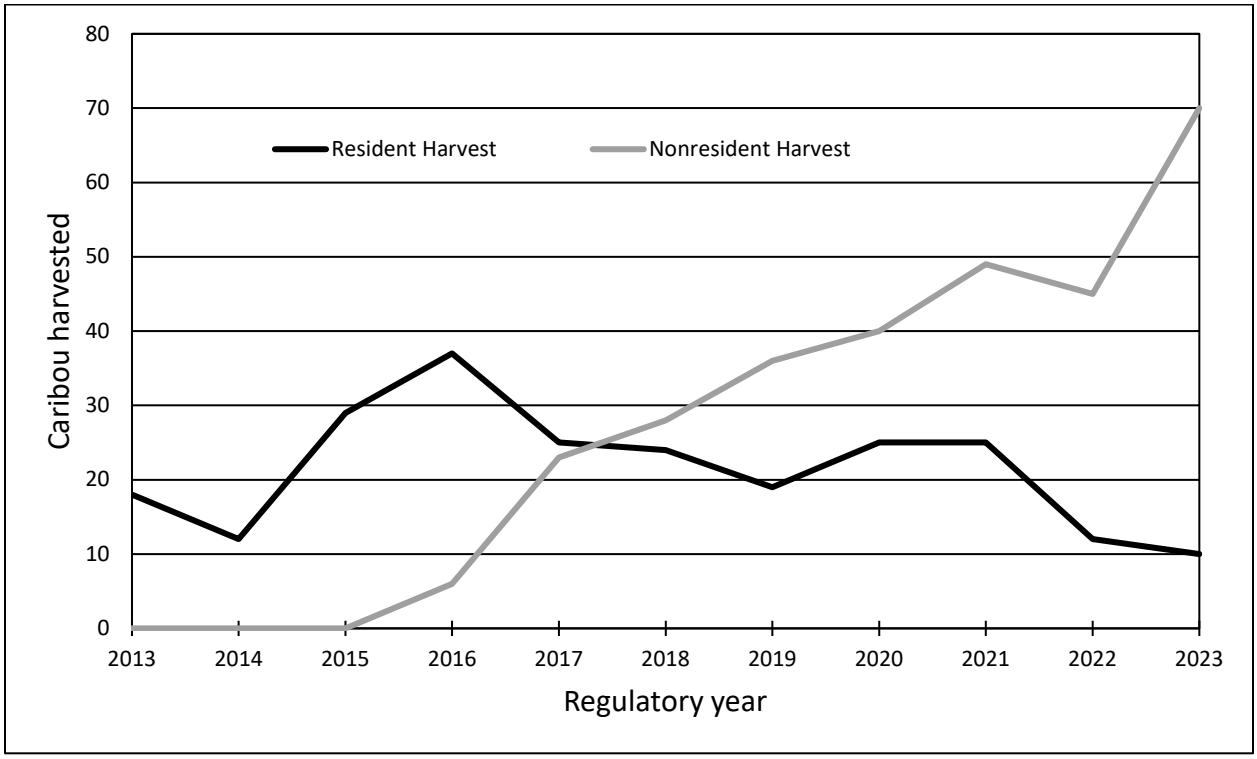

Figure 7-3. Number of reported caribou harvested by residents and nonresidents from the Southern Alaska Peninsula caribou herd, regulatory years 2013–2023.

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

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

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

PROPOSED BY: Chaluka Corporation

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

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

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

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

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

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

> (A) a person who can demonstrate ownership of the animal may pursue and capture the animal within 48 hours after the animal escapes from confinement, without needing to obtain a permit from the department;
>
> (B) a person who can demonstrate ownership of the animal may pursue and capture the animal more than 48 hours after the animal escapes from confinement only if the person obtains a permit from the department;
>
> (C) any free-ranging musk oxen, bison, reindeer, or elk for which ownership cannot be demonstrated is presumed to be game;

5 AAC 92.990. Definitions.

(a) In addition to the definitions in AS 16.05.940, in 5 AAC 84–5 AAC 92, unless the context requires otherwise,

…

(21) "deleterious exotic wildlife" includes

(A) English sparrow;

(B) raccoon;

(C) starling;

(D) unconfined or unrestrained

(i) Belgian hare;

(ii) Muridae rodent;

(iii) rockdove;

(E) feral

(i) ferret;

(ii) swine;

(F) Eurasian collared dove;

….

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

BACKGROUND: Umnak Island is part of the Fox Islands located in the Unit 10 portion of the Aleutian Islands approximately 850 miles from Anchorage. The 1,571 mi^2 island is the third largest Aleutian Island and is owned by eight landowners including the state, the federal government (Alaska Maritime National Wildlife Refuge), Chaluka Corporation (Nikolski), TDX Corporation (St. Paul), and St. George Tanaq Corporation (St. George). All island inhabitants (<50) reside in the only remaining community of Nikolski.

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

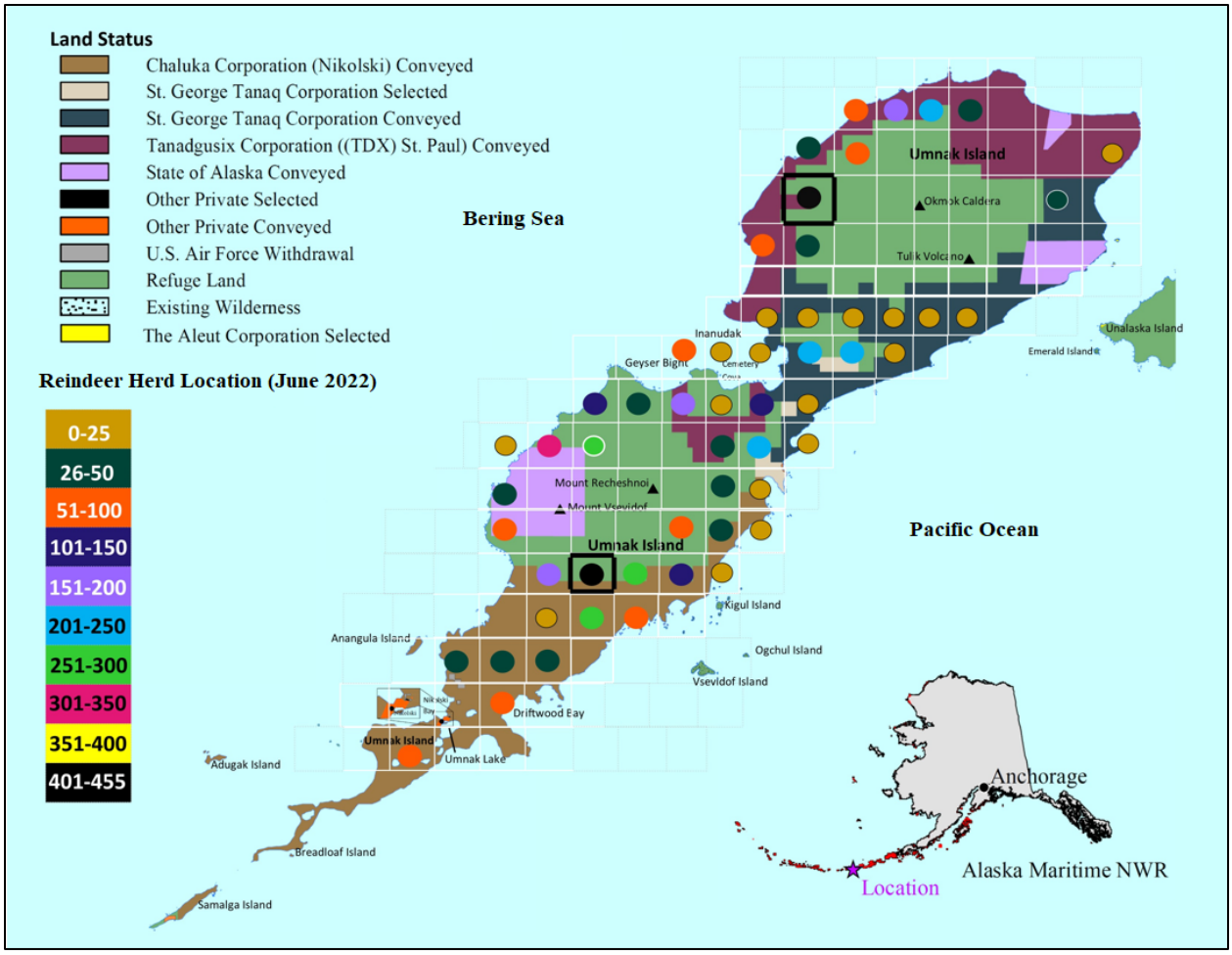

Figure 8-1. Caribou locations during 2022 survey of Umnak Island (map courtesy of APICDA).

According to the proponent sometime after ANCSA passed in 1971:

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

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

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

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

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

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

PROPOSED BY: Anthony Marchini

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

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

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

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

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

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

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

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

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

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

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

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

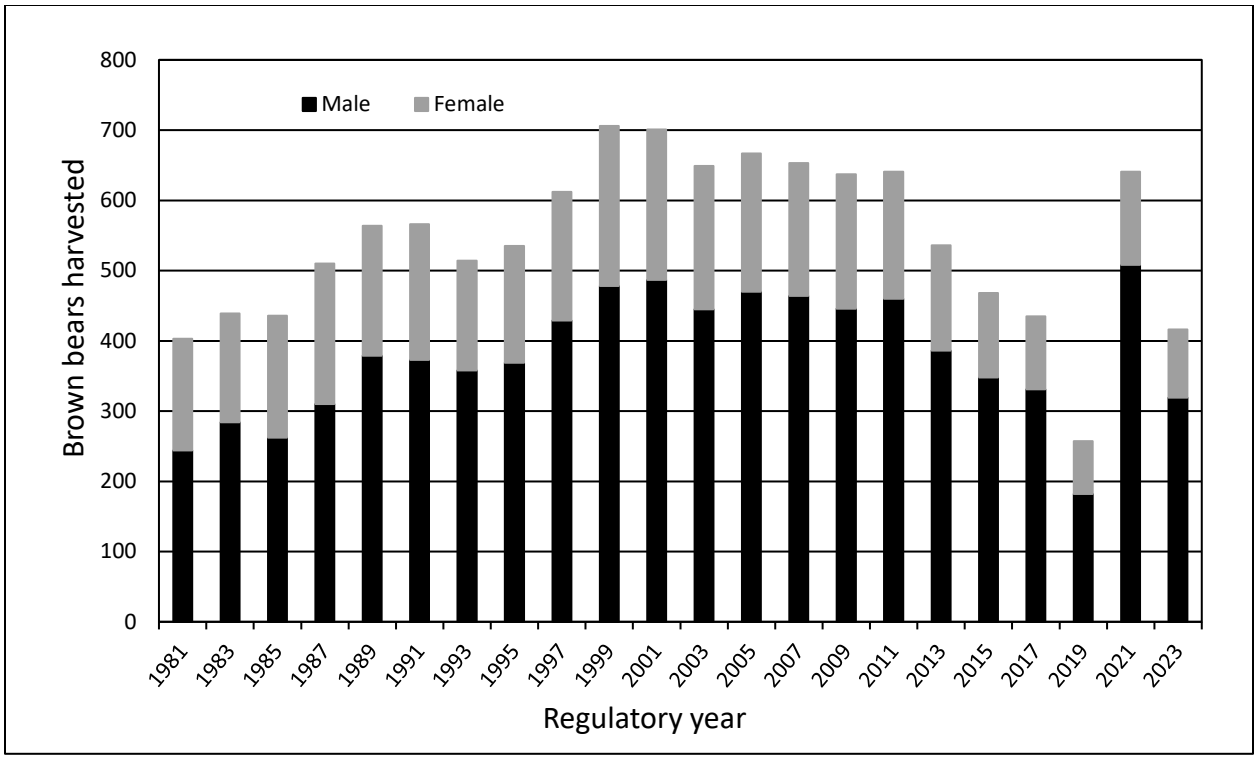

Figure 9–1. Total brown bears harvested in Unit 9, regulatory years 1981 through 2023.

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

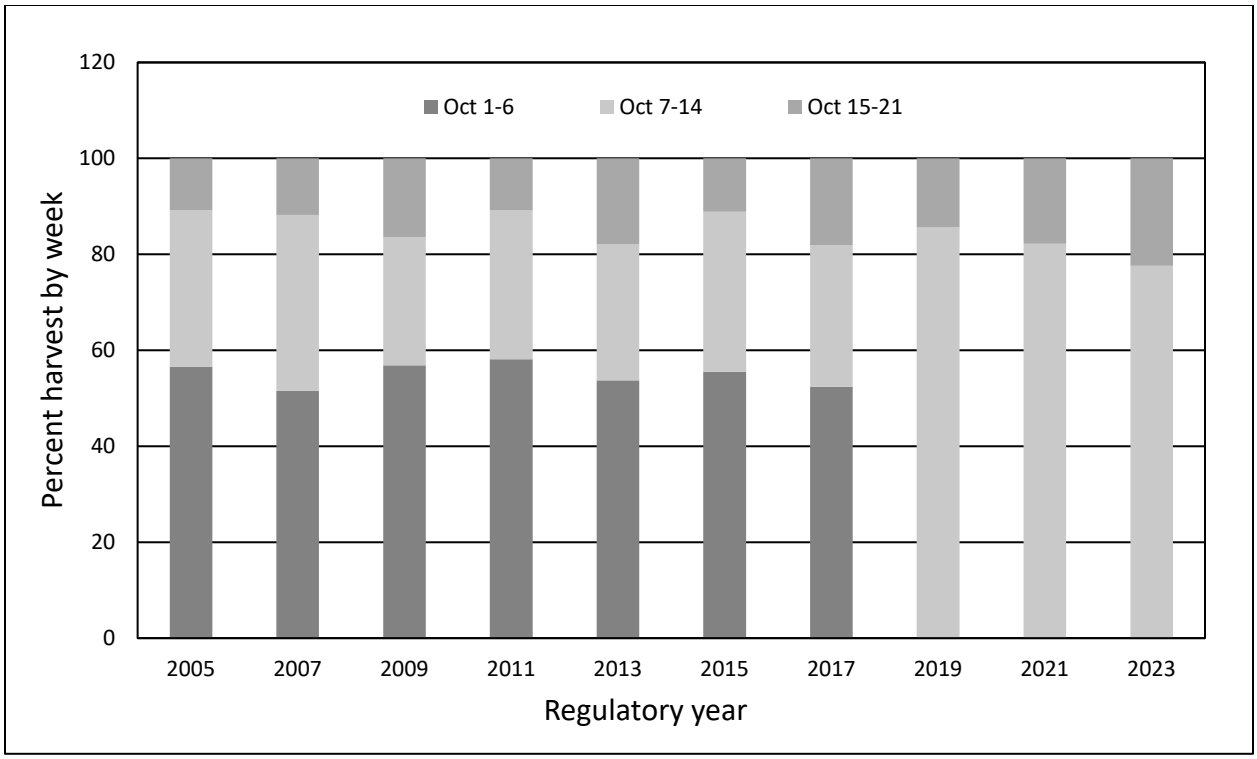

Figure 9-2. Harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when fall season was shortened starting in 2019, regulatory years 2005 through 2023.

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

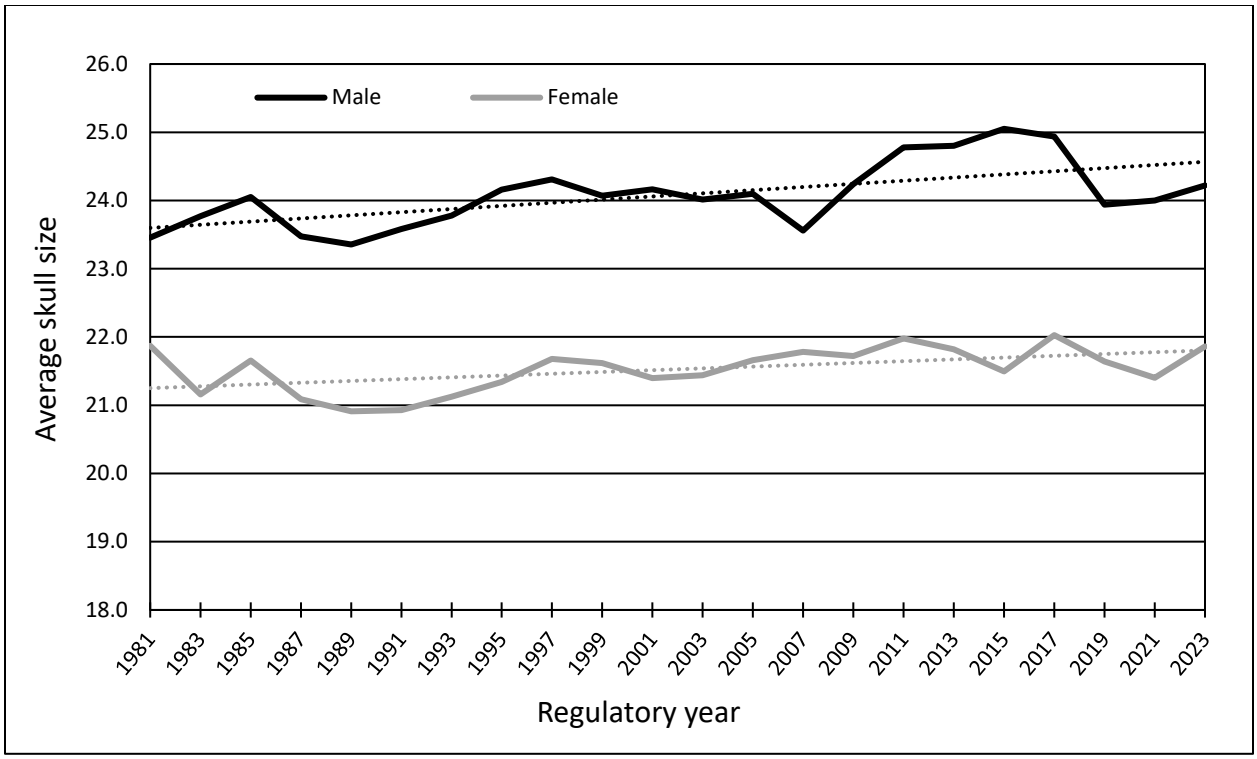

Figure 9-3. Average skull size of harvested male and female brown bears in Unit 9, regulatory years 1981 through 2023.

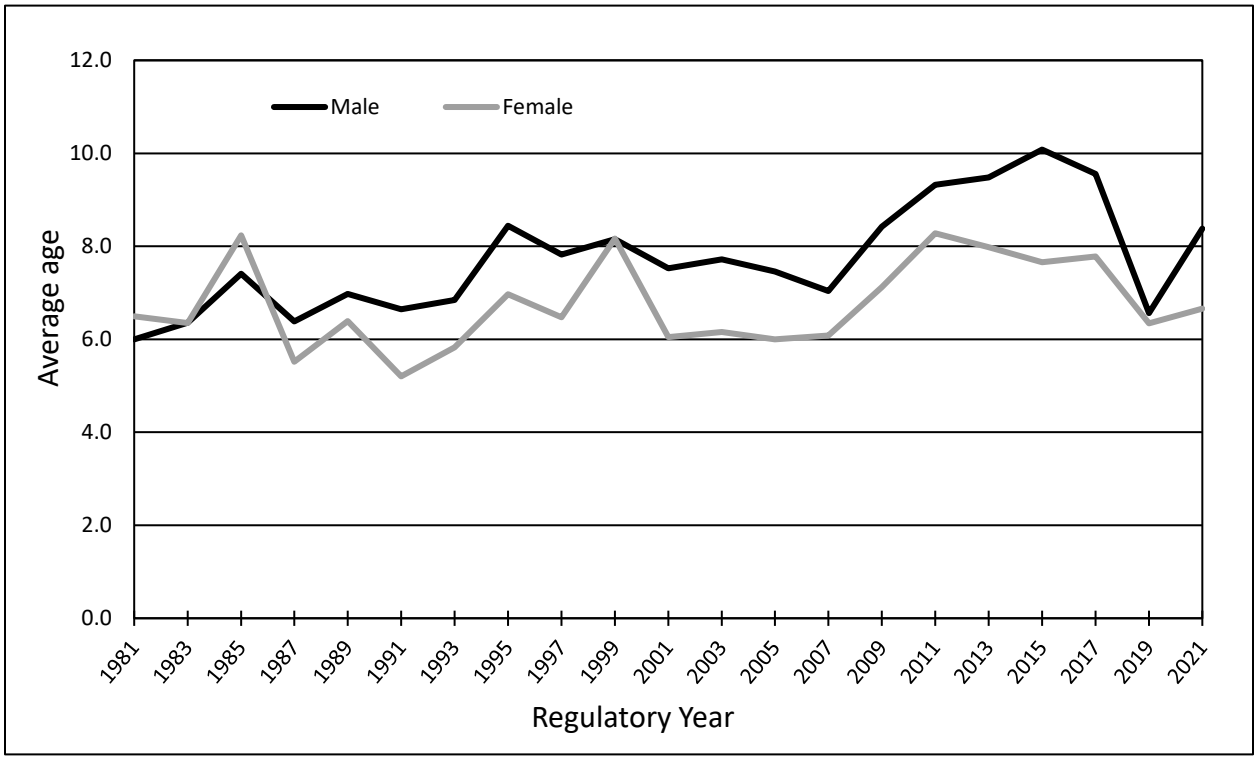

Figure 9-4. Average age of harvested male and female brown bears in Unit 9, regulatory years 1981 through 2023.

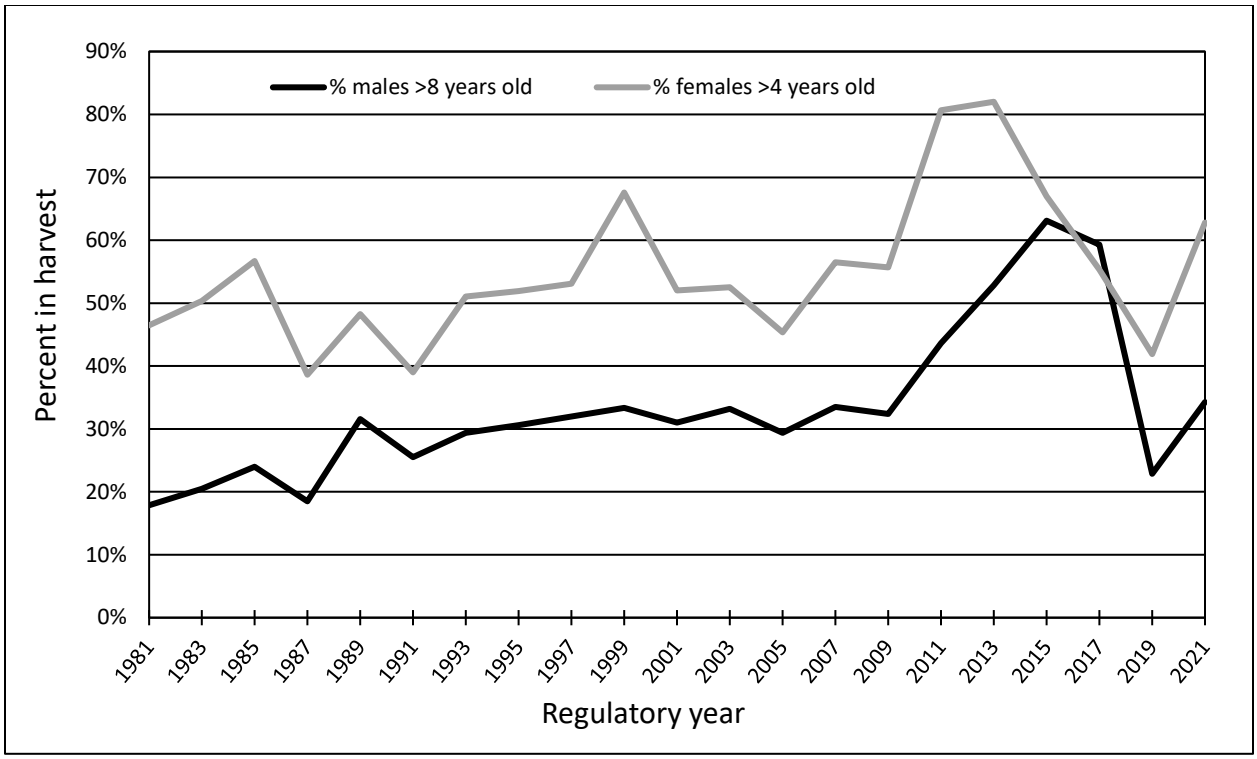

Figure 9-5. Percent harvested male brown bears greater than 8 years old and percent harvested female brown bears greater than 4 years old in Unit 9, regulatory years 1981 through 2021.

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

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

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

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

PROPOSED BY: Wayne Hall

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

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

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

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

BACKGROUND: Unit 9A has approximately 1,600 mi^2 of available brown bear habitat (with high elevation and large bodies of water subtracted) of which about 480 mi^2 is open to bear hunting (Table 10-1, Figure 10-1). The remaining 1,130 mi^2 of bear habitat is in Lake Clark National Park (LCNP) and McNeil River State Game Refuge and Sanctuary, both of which are closed to hunting and provide large areas of refugia. However, bears have large home ranges and move freely across administrative boundaries. Seasonal and daily movements are largely the result of available food resources.

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

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

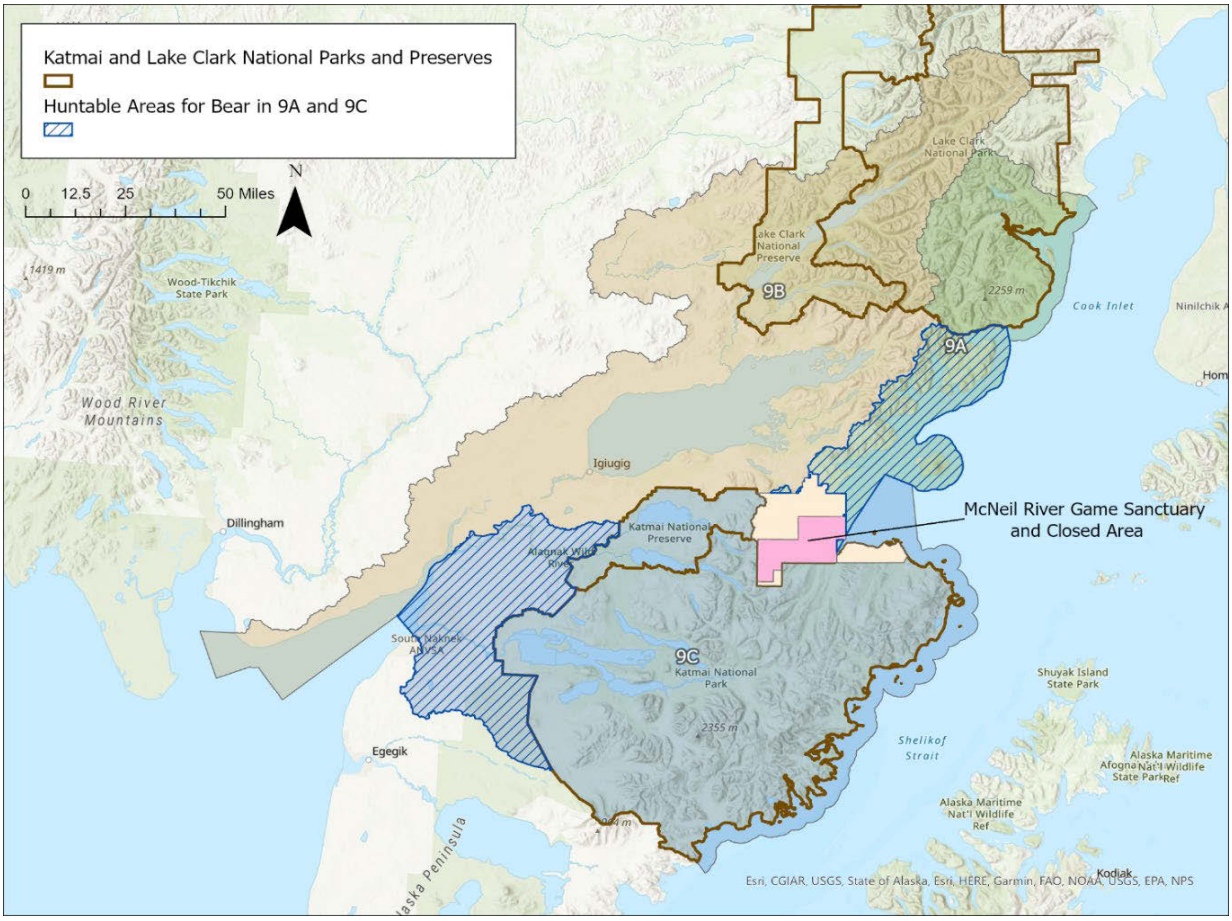

Figure 10-1. Unit 9A is composed primarily of Lake Clark NP to the north, a central area of state and private lands, and McNeil River State Game Refuge and Sanctuary to the southwest.

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

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

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

[a] Fall season only

[b] Spring (2021) season only

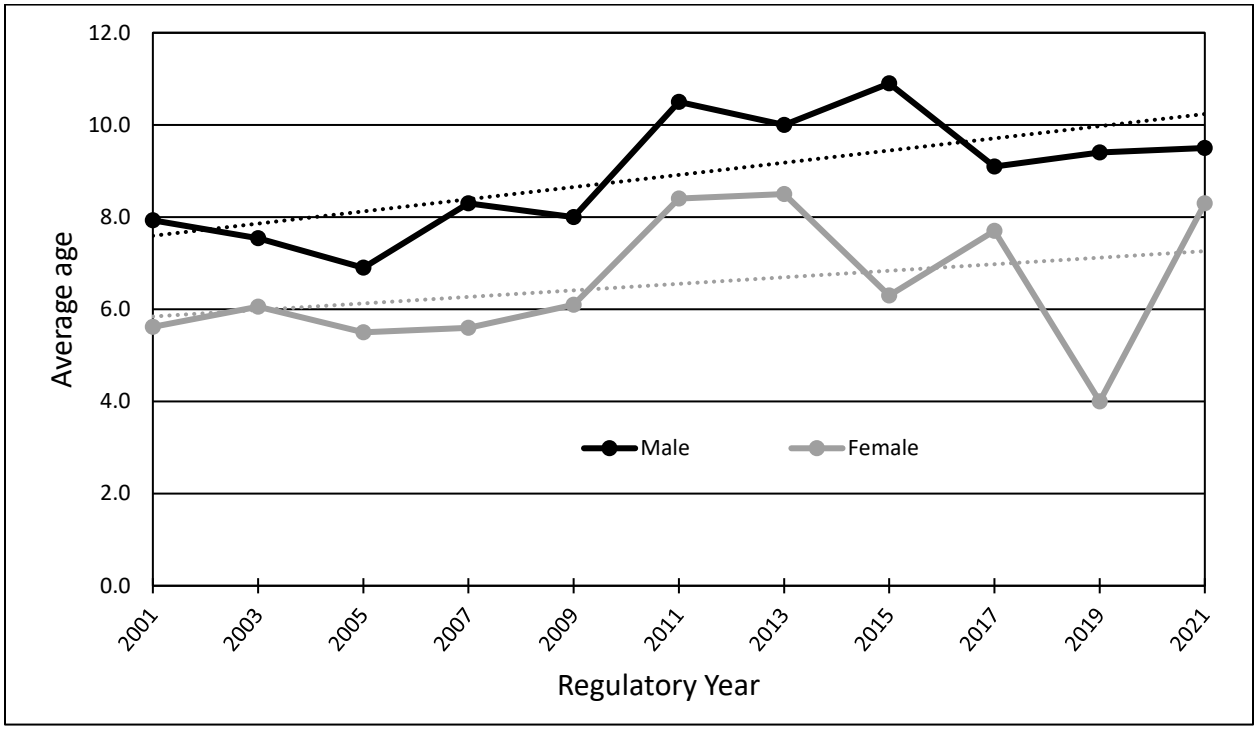

Figure 10-2. Average ages of male and female brown bears harvested in Unit 9A, regulatory years 2001–2021.

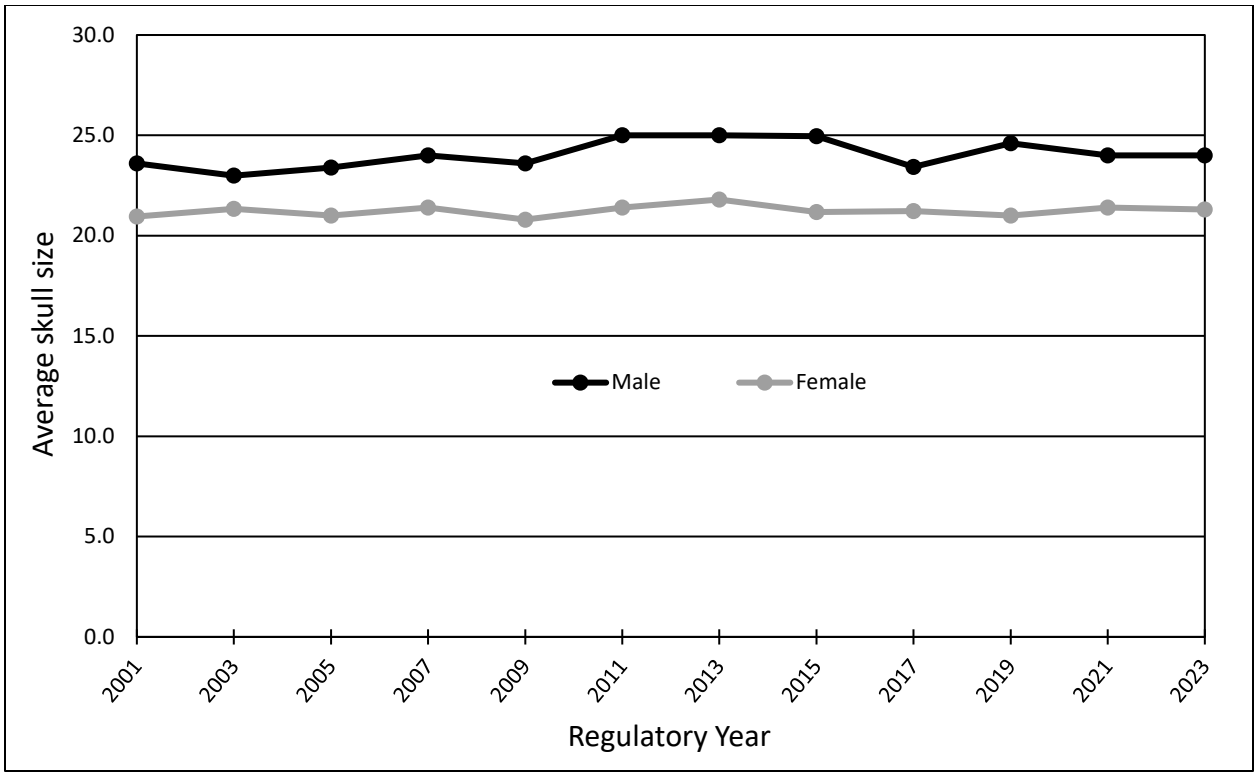

Figure 10-3. Average skull sizes of male and female brown bears harvested in Unit 9A, regulatory years 2001–2021.

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

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

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

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

PROPOSED BY: Jennifer Culbertson

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

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

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

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

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

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

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

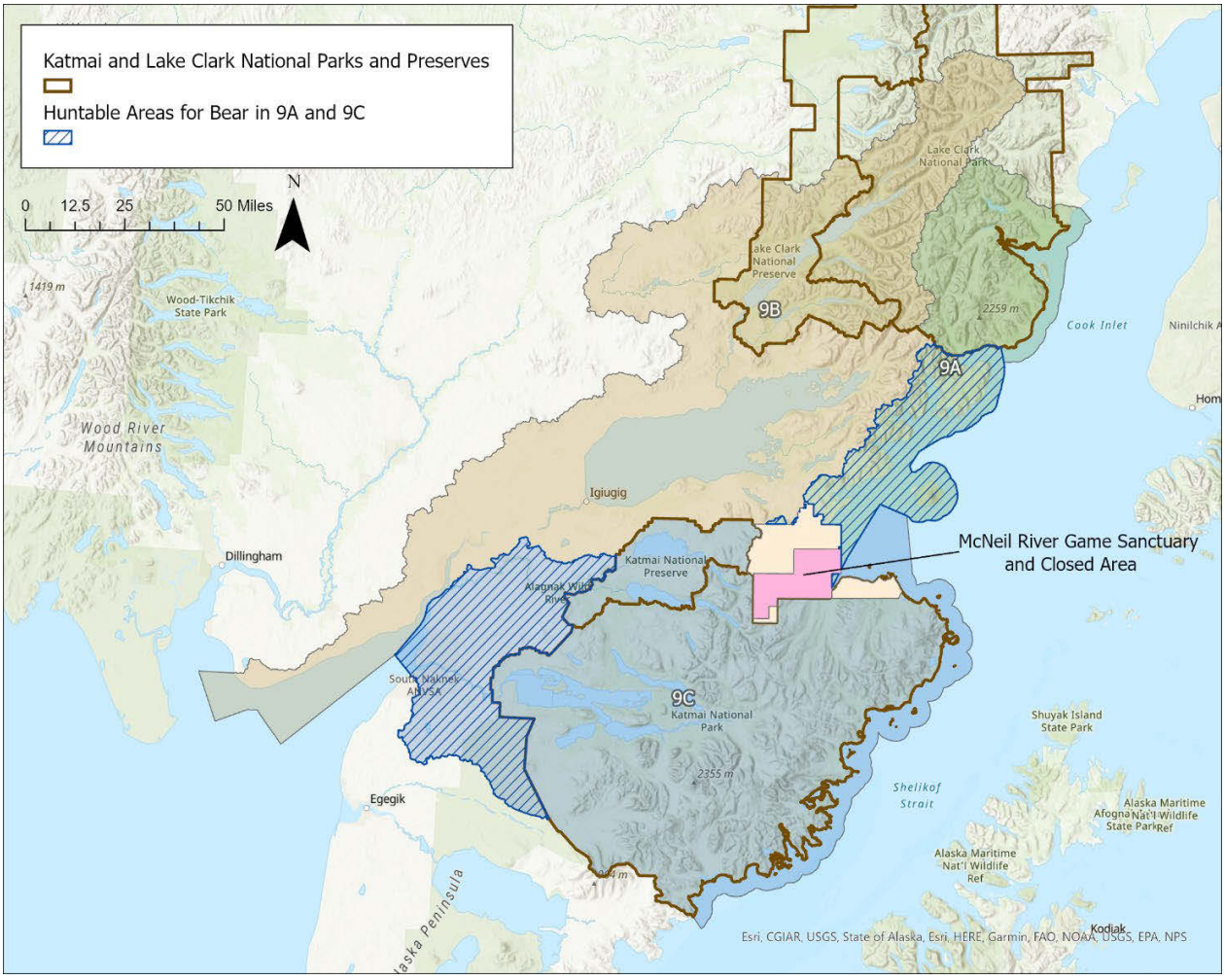

Figure 11-1. Unit 9C is composed primarily of Katmai National Park and Preserve and a western area of state and private lands.

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

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

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

[a] Fall season only
[b] Spring (2021) season only
[c] Total hunters include unsuccessful resident and nonresident hunters.

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

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

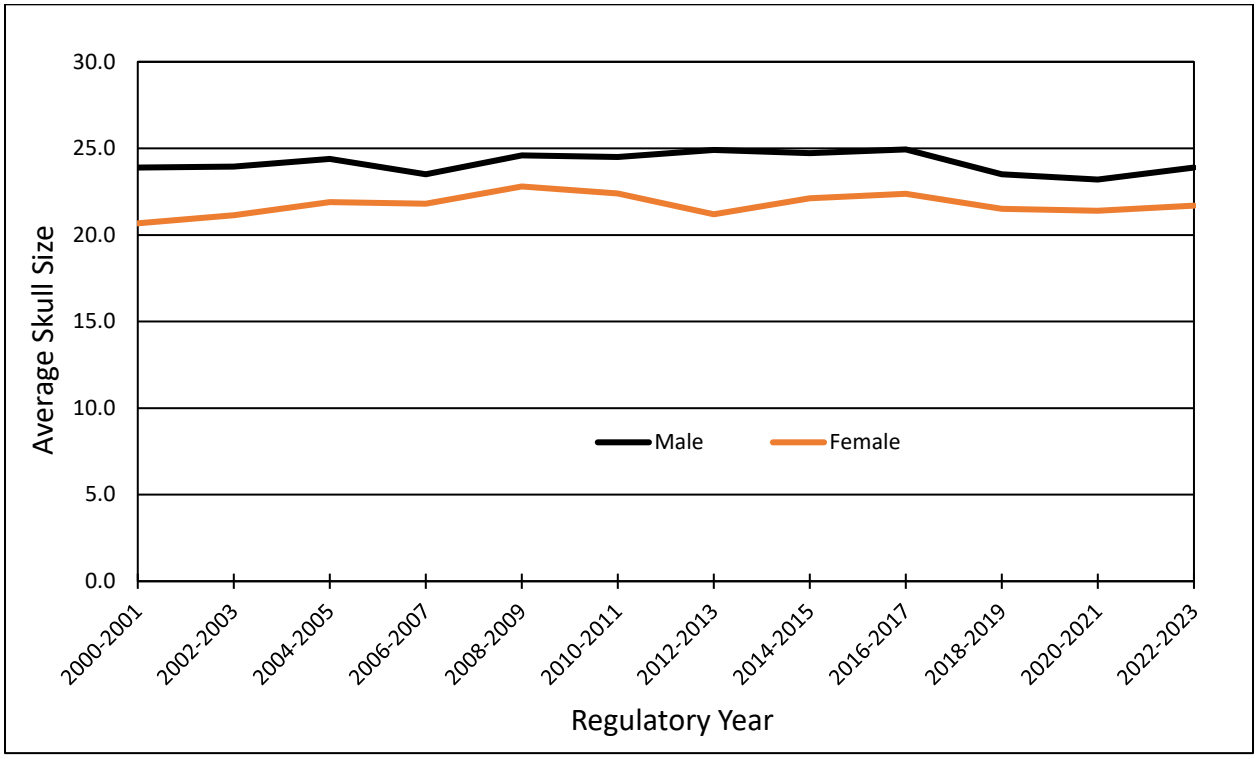

Figure 11-3. Average skull sizes of male and female brown bears harvested in Unit 9C, regulatory years 2001–2023.

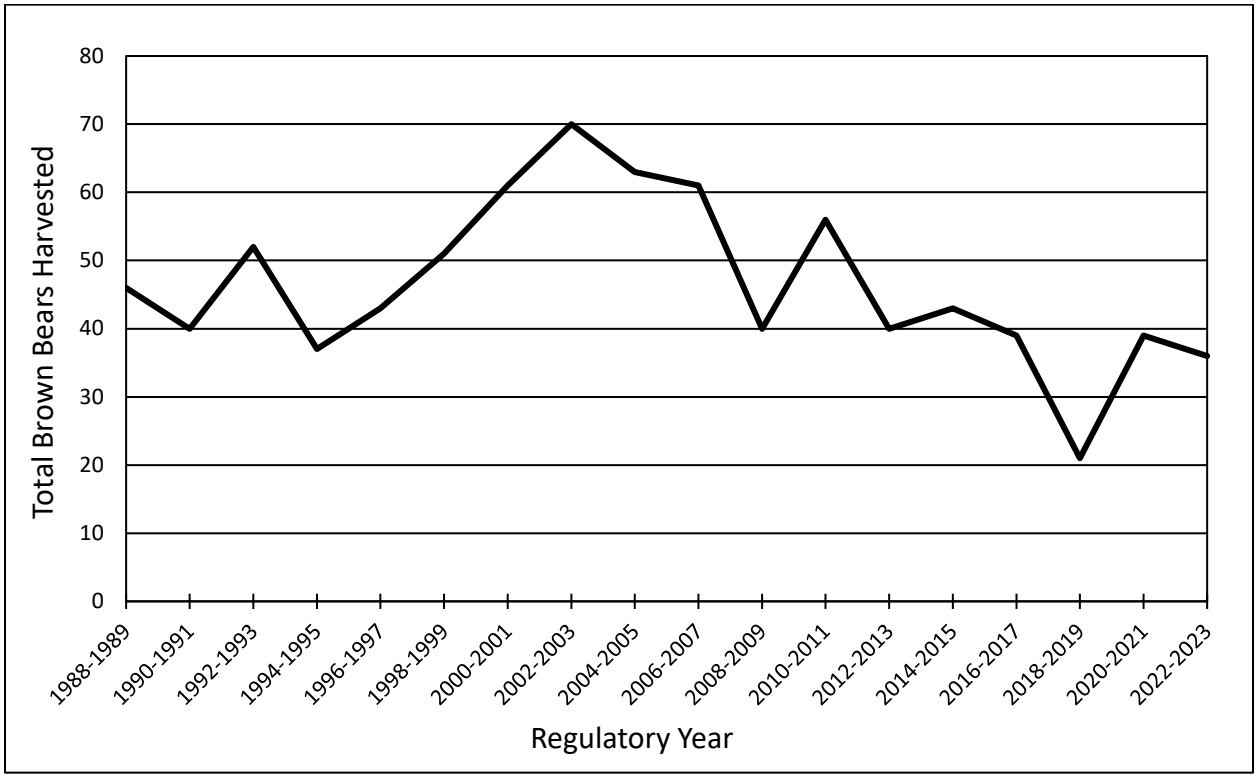

Figure 11-4. Total numbers of brown bears harvested in Unit 9C, regulatory years 1989–2023.

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

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

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

PROPOSED BY: Jordan Wallace & Dave Leonard

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

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

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

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

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

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

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

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

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

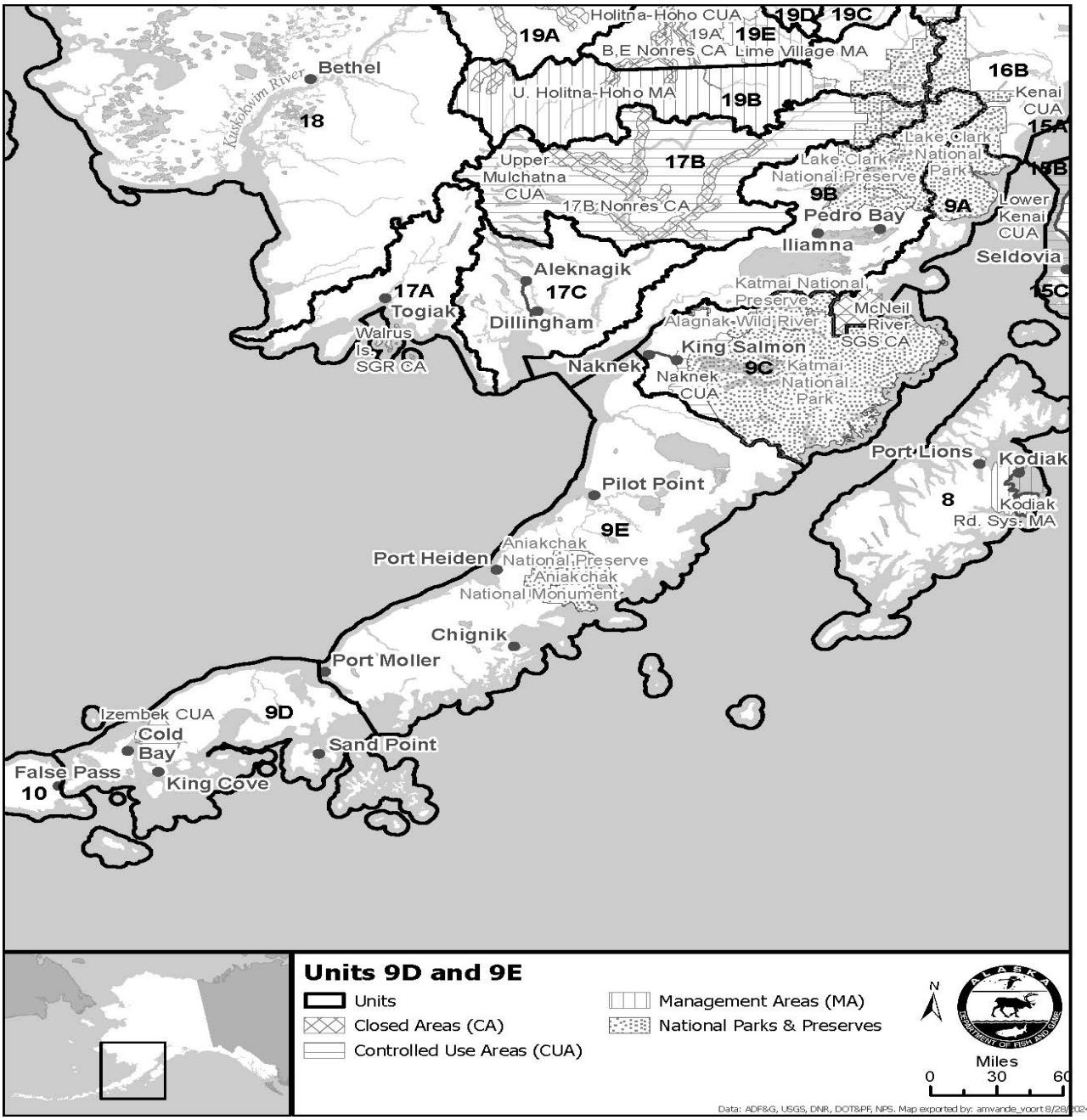

Figure 12-1. Game Management Units 9D and 9E on the Alaska Peninsula.

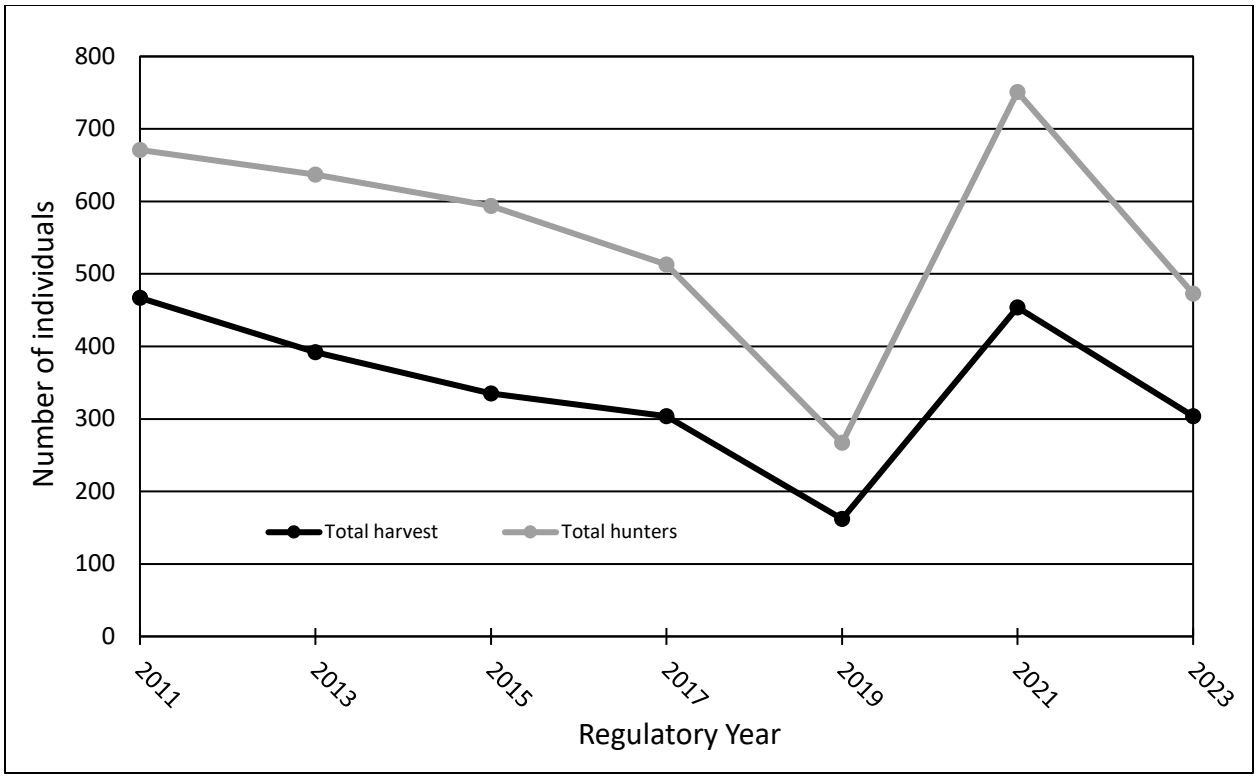

Figure 12-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

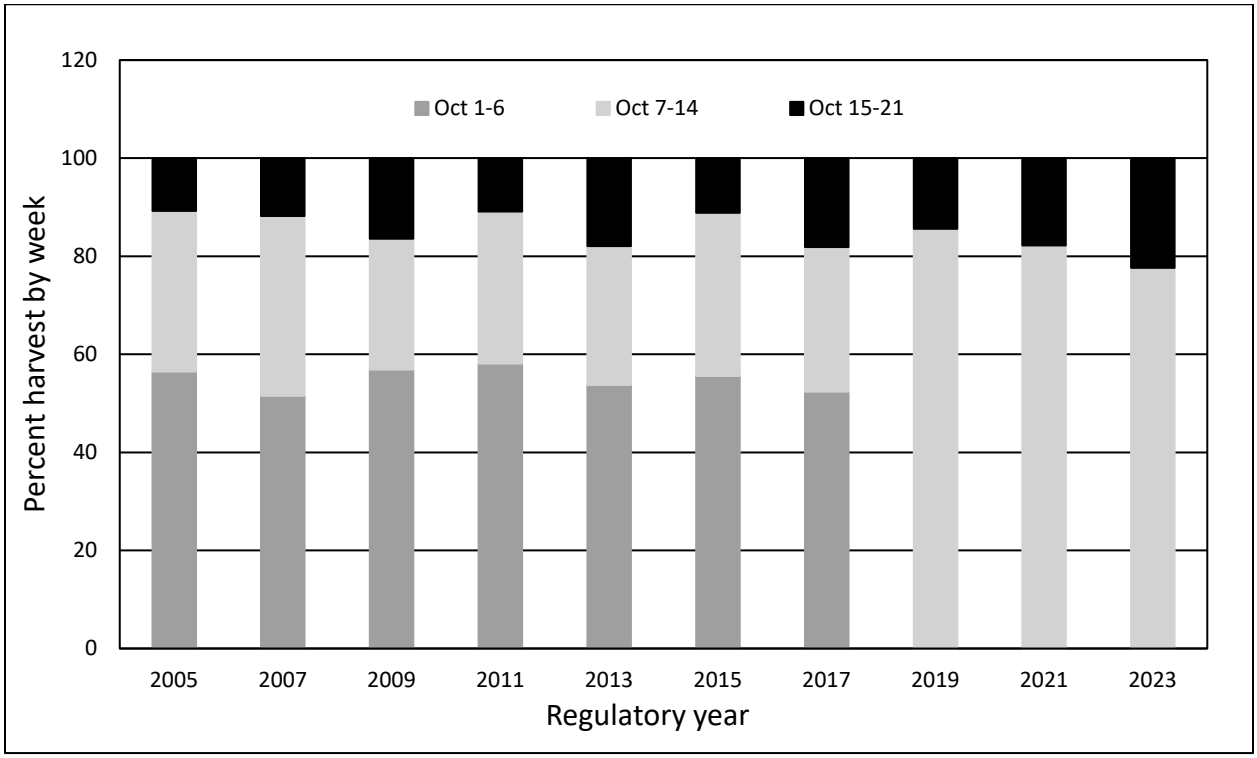

Figure 12-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

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

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

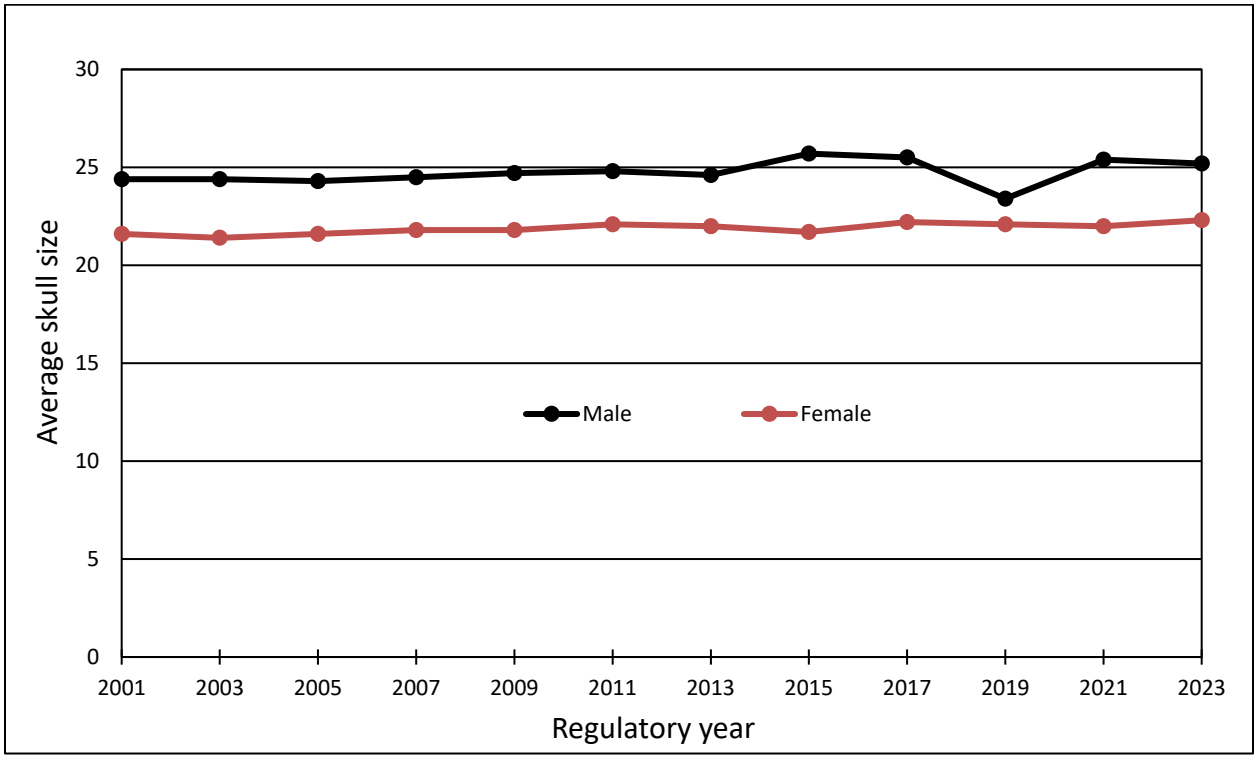

Figure 12-4. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

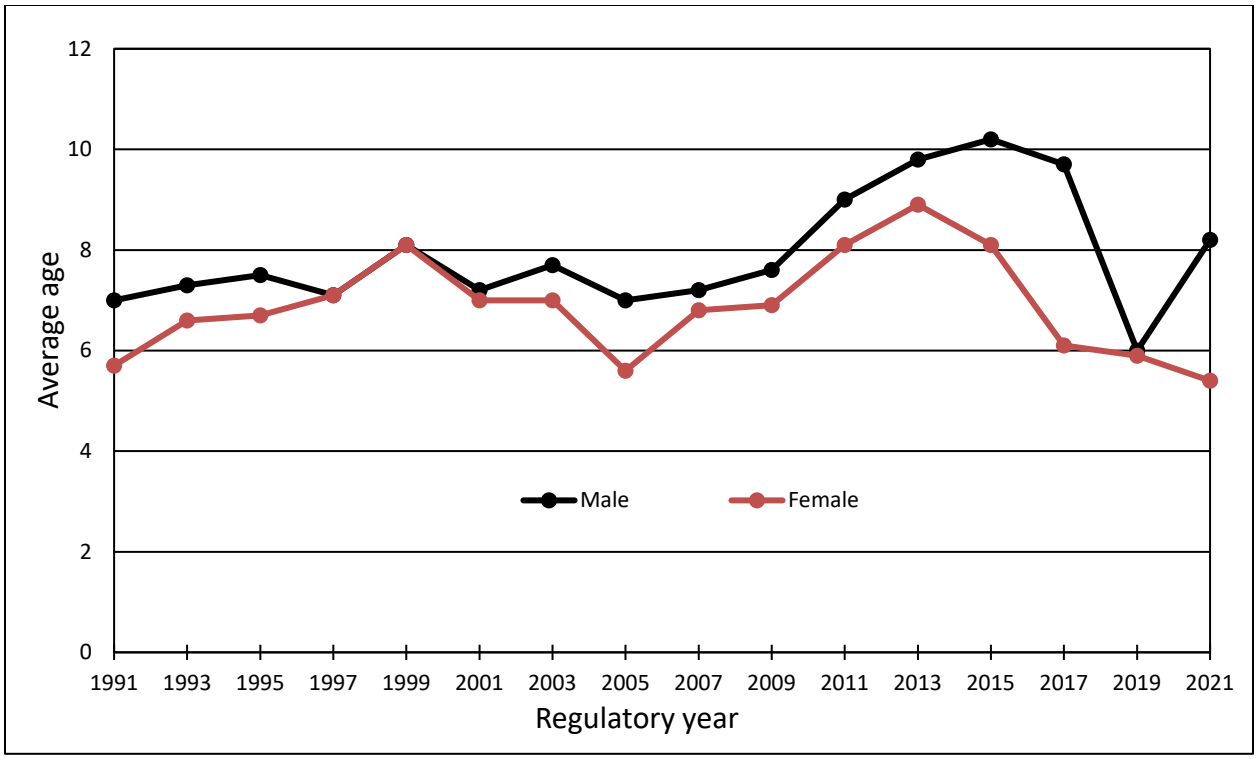

Figure 12-5. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

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

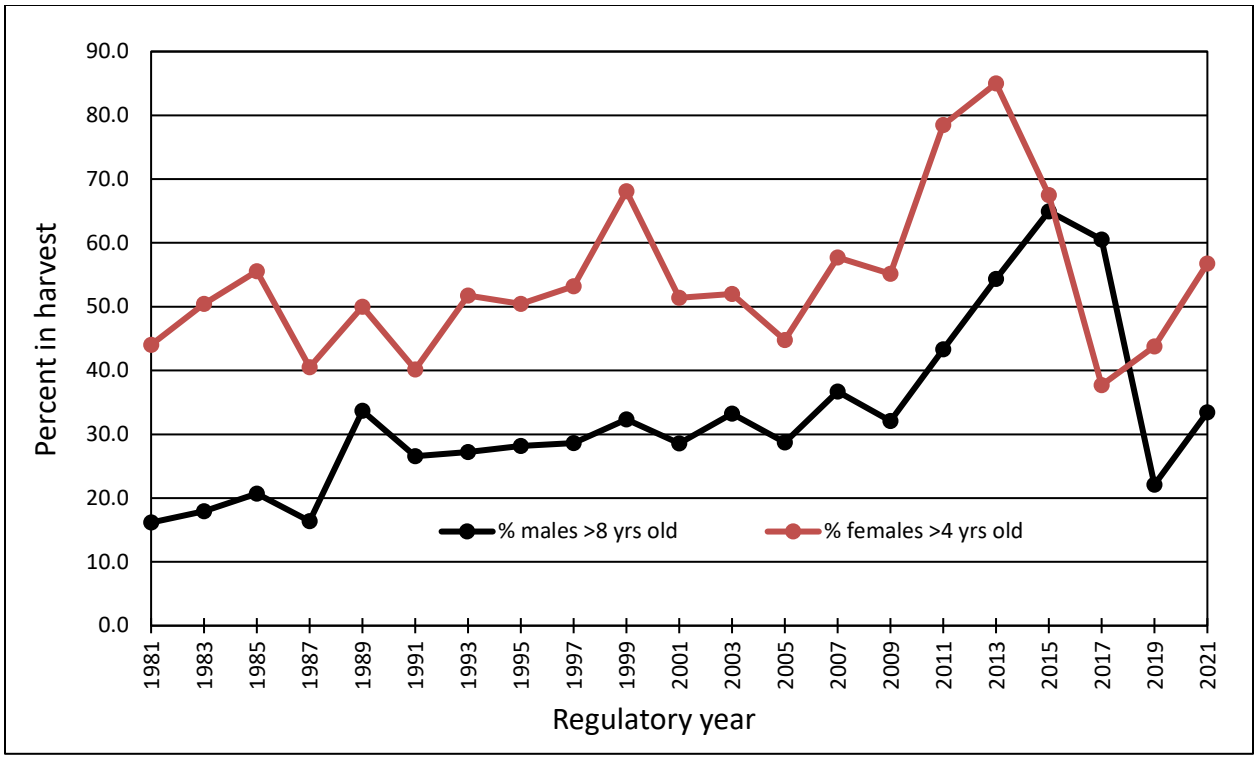

Figure 12-6. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

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

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

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

PROPOSED BY: Dan Montgomery

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

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

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

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

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

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

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

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

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

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

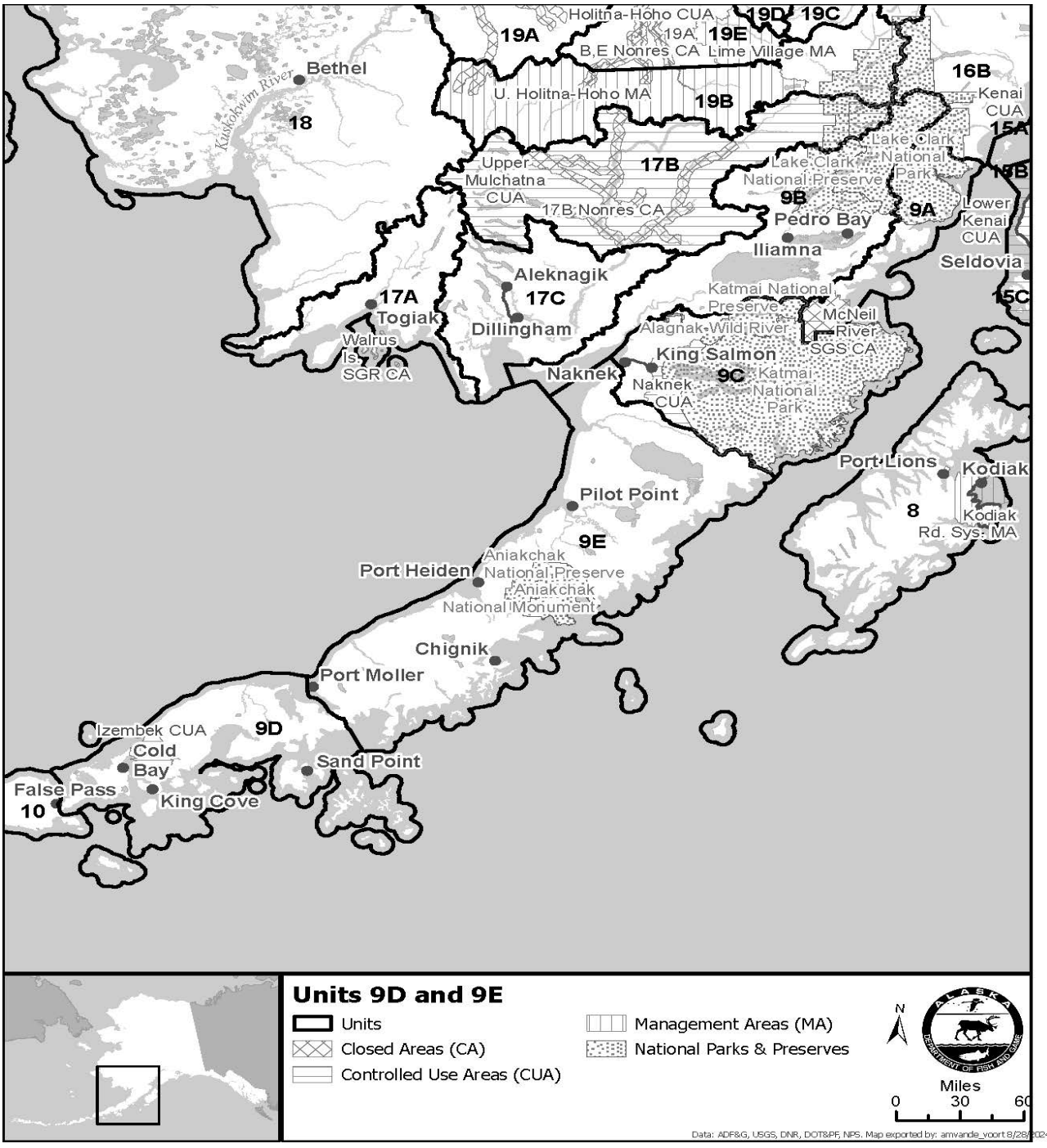

Figure 13-1. Game Management Units 9D and 9E on the Alaska Peninsula.

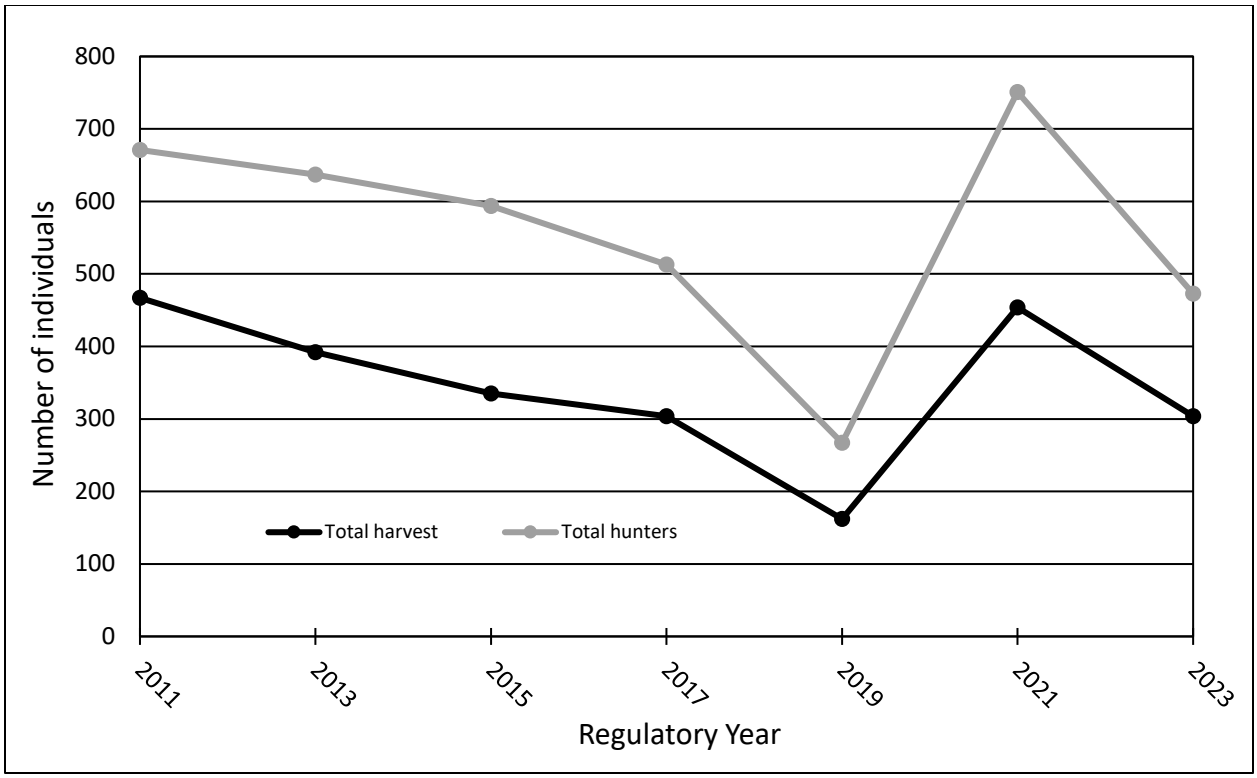

Figure 13-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

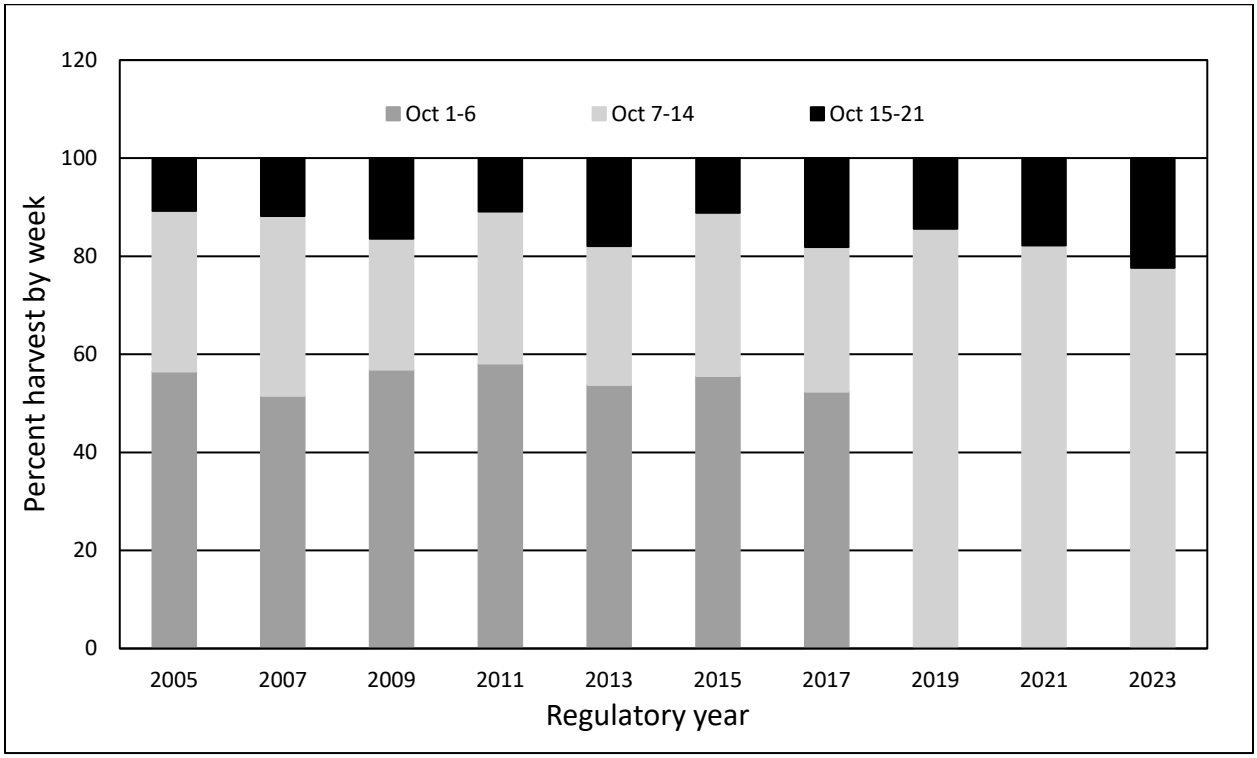

Figure 13-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

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

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

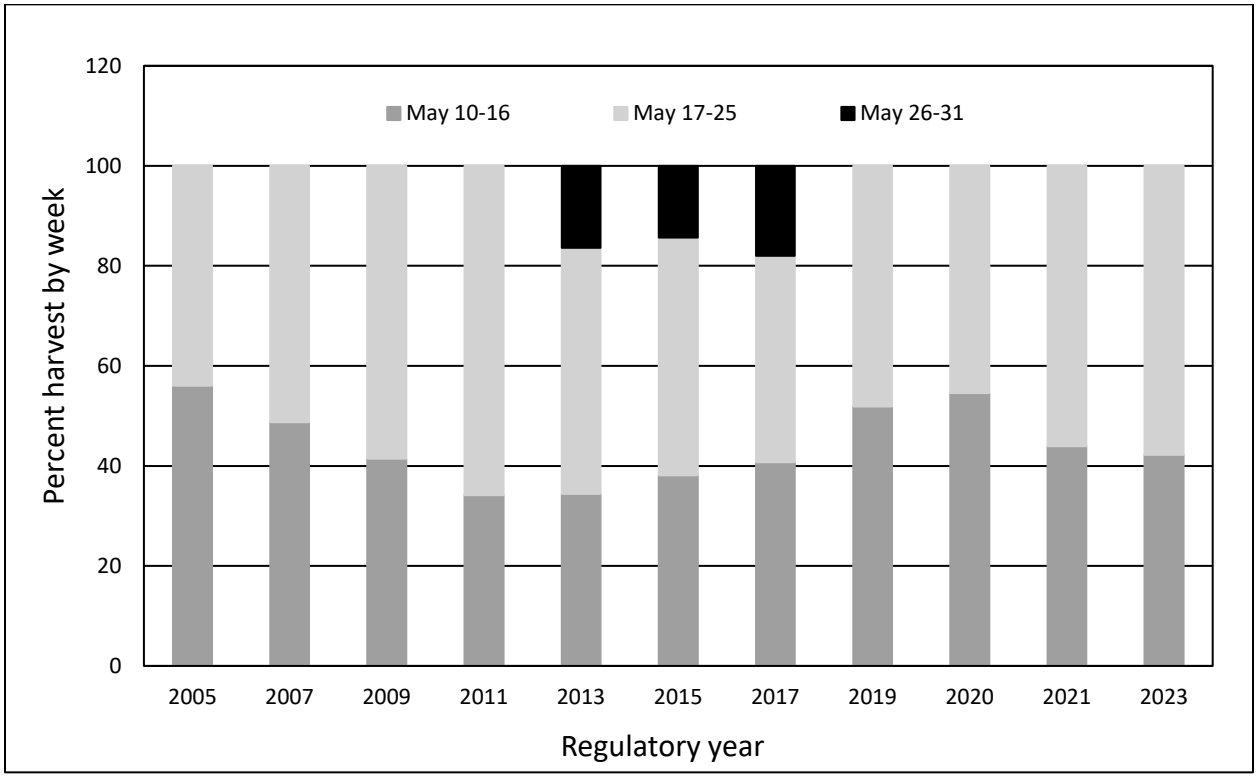

Figure 13-4. Spring harvest chronology for Units 9D and 9E, RY2005–2023.

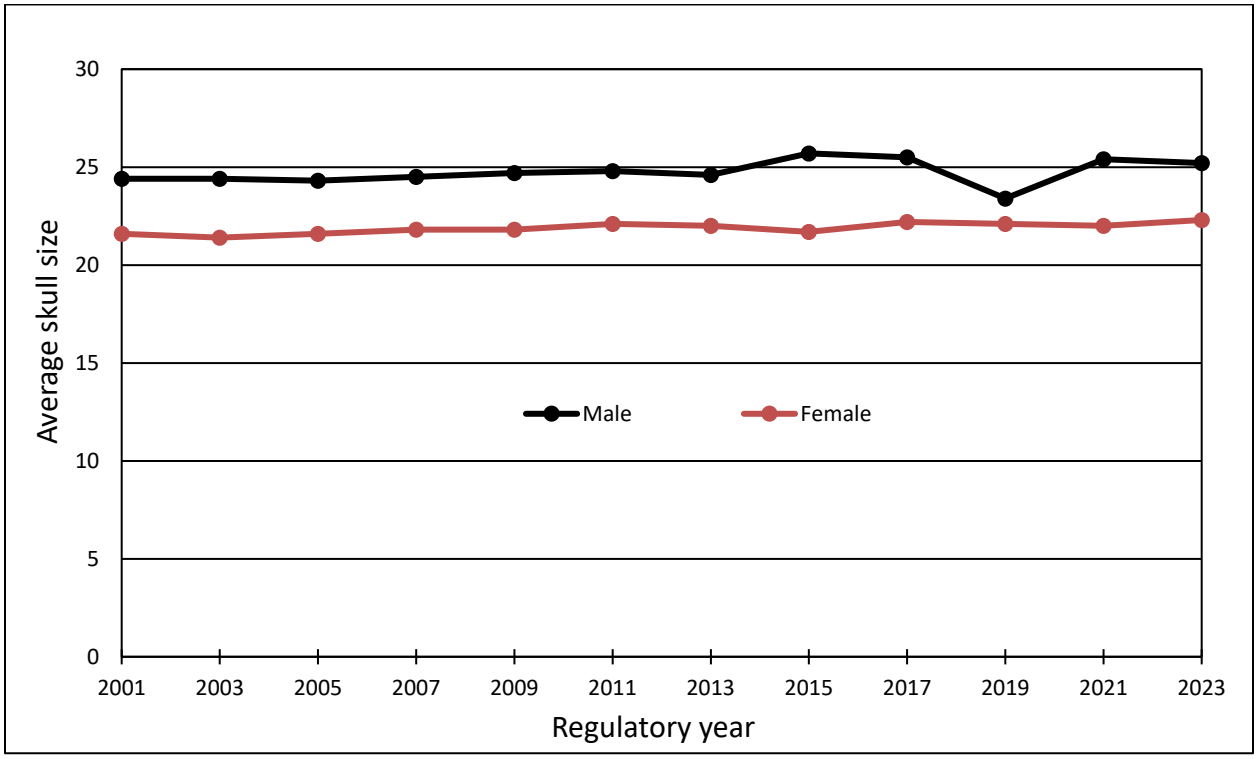

Figure 13-5. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

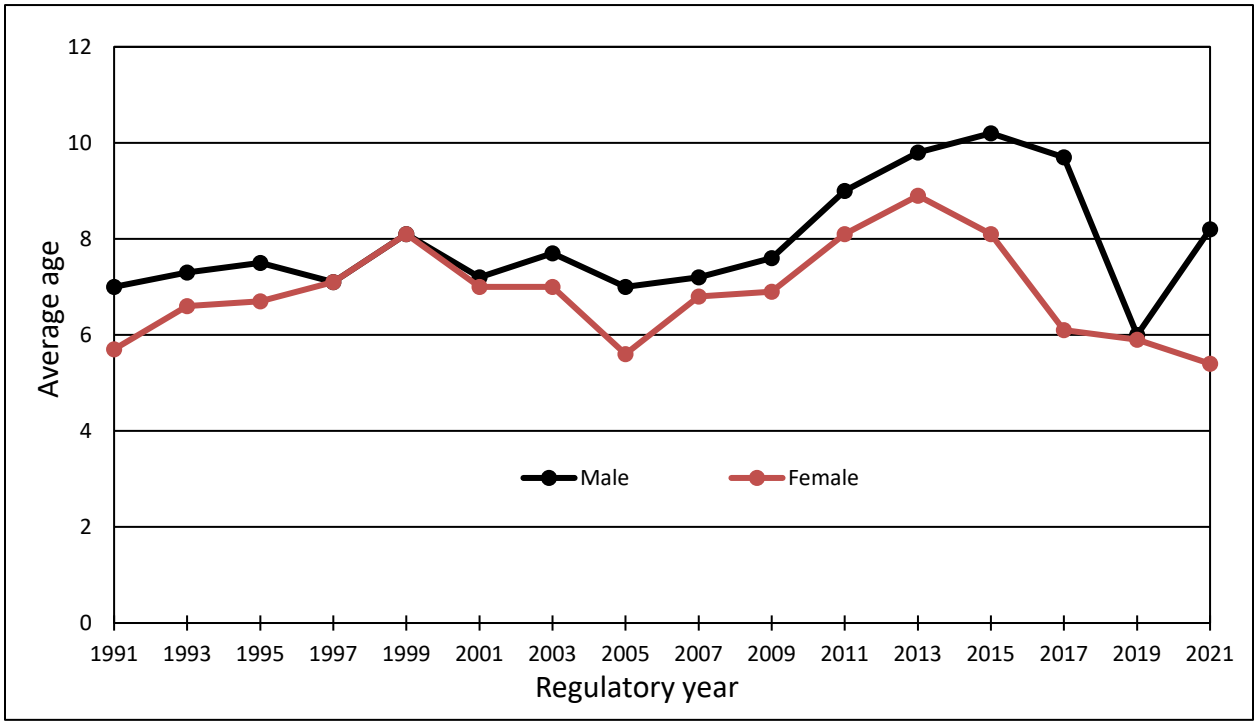

Figure 13-6. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

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

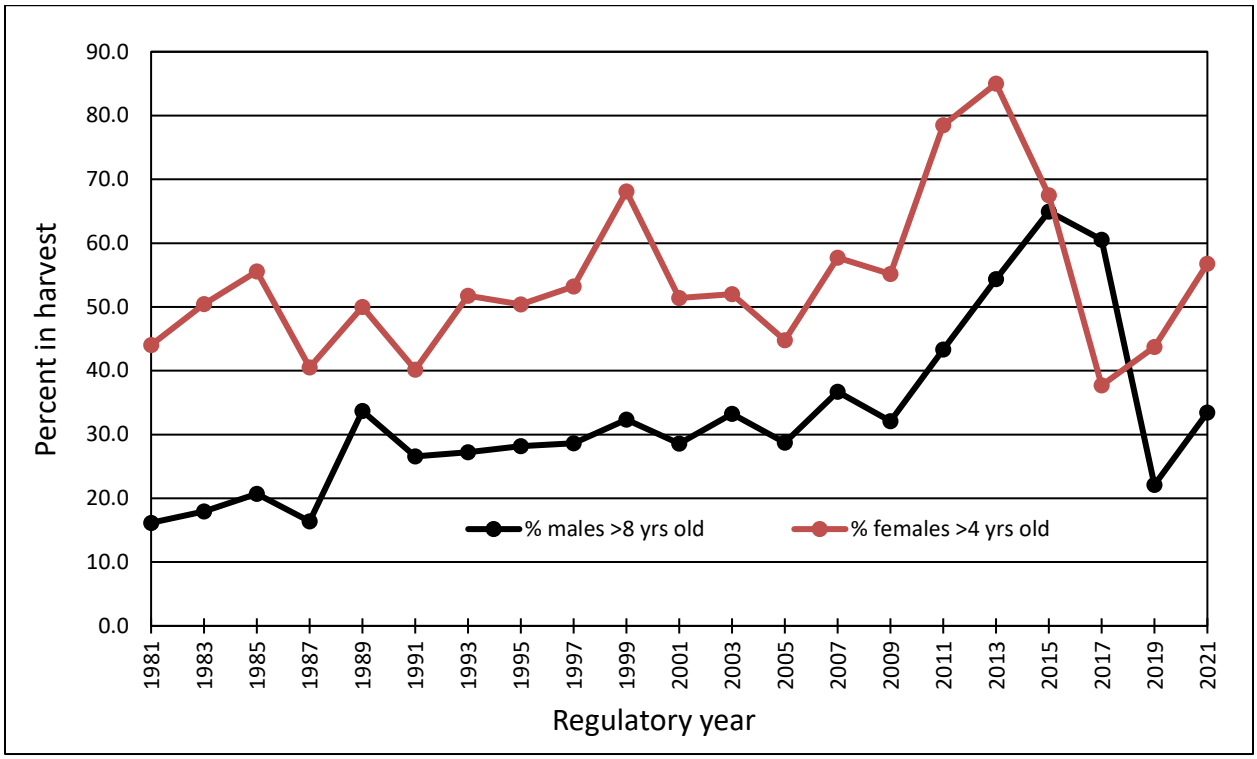

Figure 13-7. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

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

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

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

PROPOSED BY: David Byrd

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

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

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

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

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

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

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

BACKGROUND: Units 9D and 9E have approximately 15,330 mi^2 of available brown bear habitat (excluding high elevation and large water bodies) with all of it open to hunting except Aniakchak National Monument (943 mi^2) (Figure 14-1). Izembek National Wildlife Refuge, Alaska Peninsula, and Becharof National Wildlife Refuges are also included in Units 9D and 9E. Registration permits were required beginning in 2011 to better monitor harvest and hunter

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

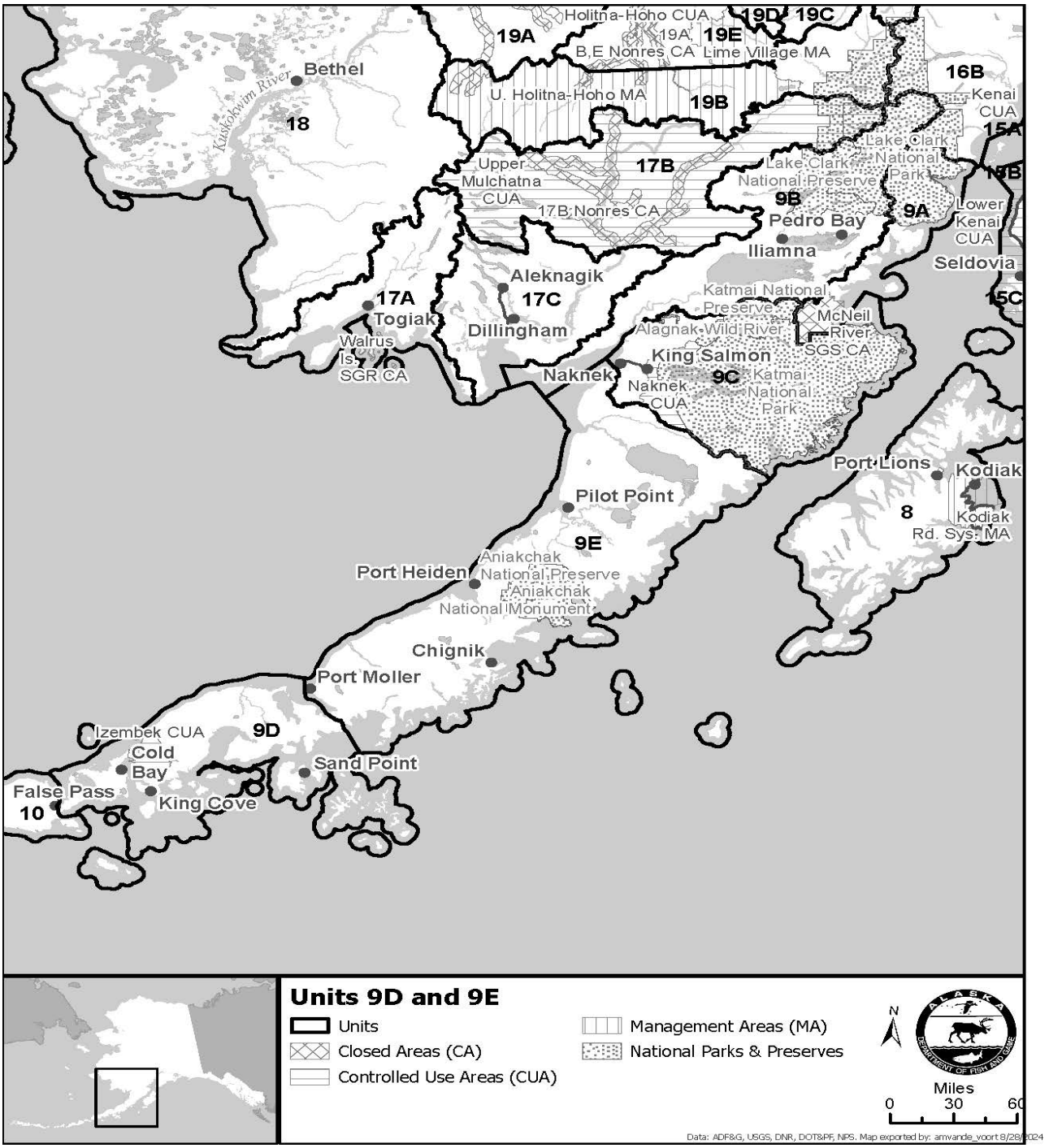

Figure 14-1. Game Management Units 9D and 9E on the Alaska Peninsula.

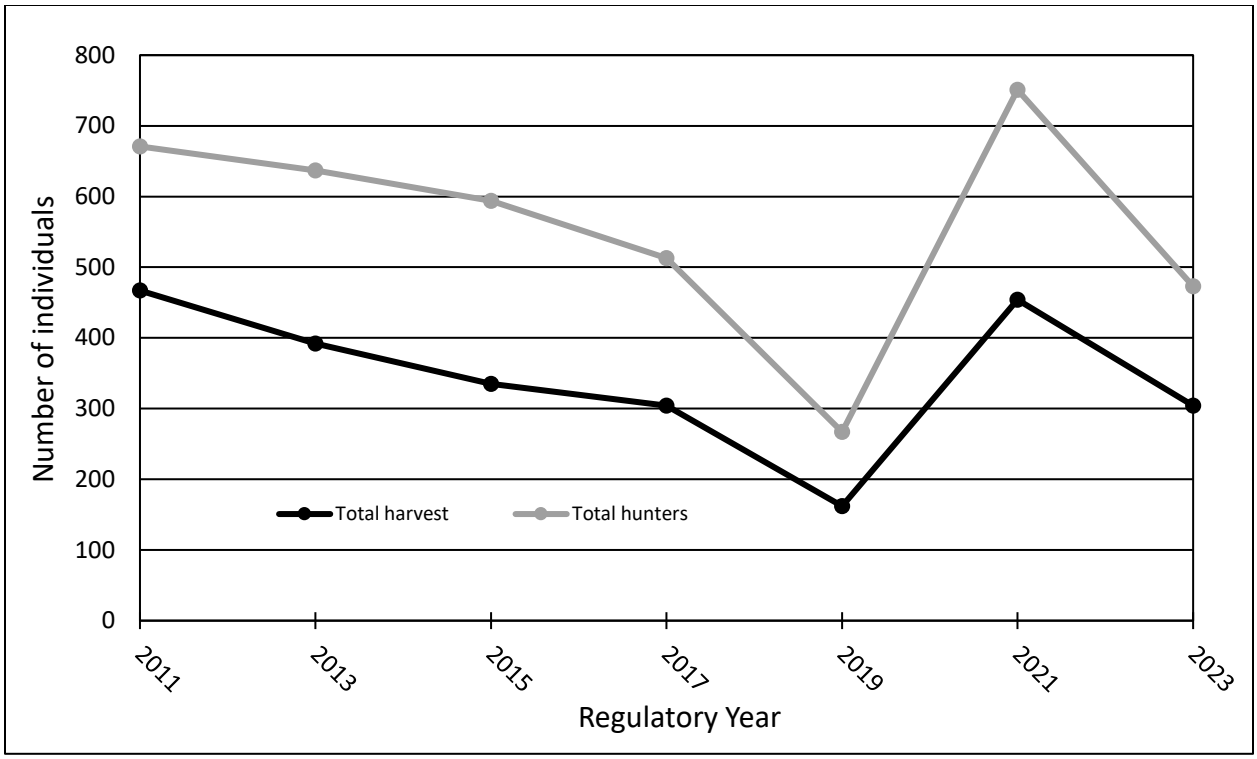

Figure 14-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

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

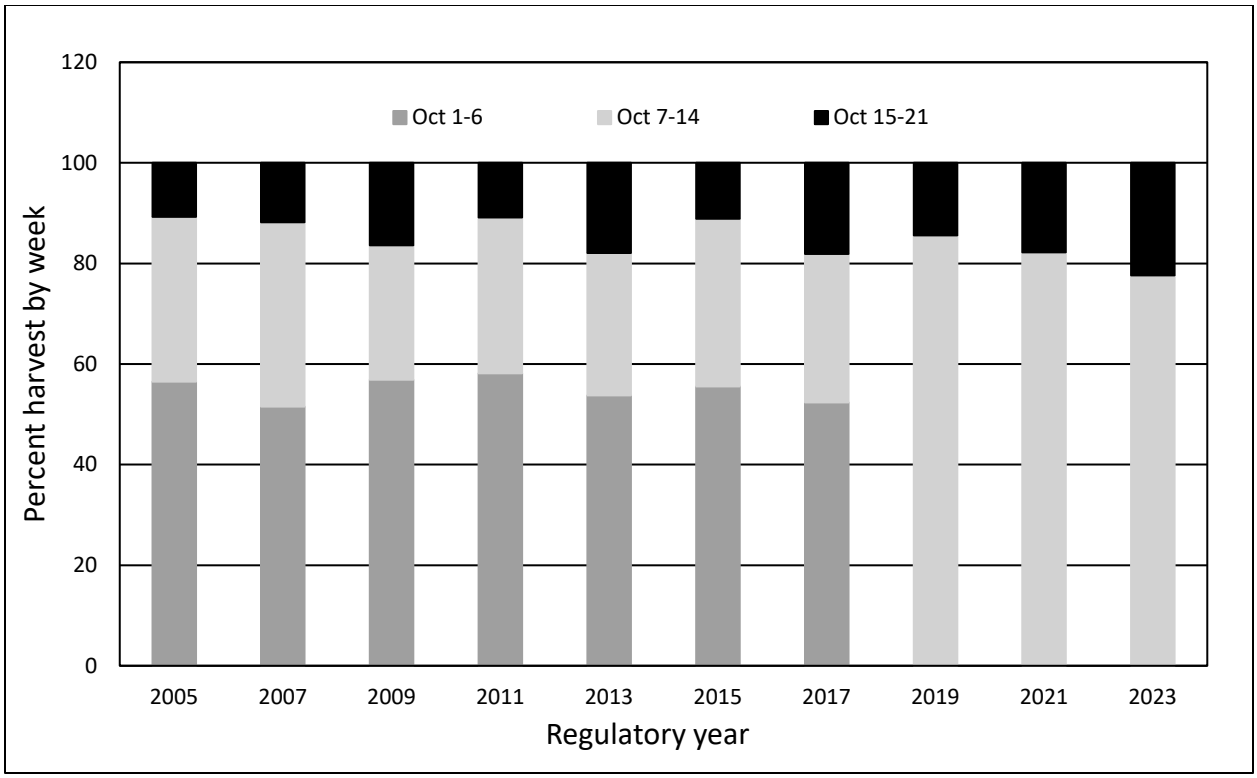

Figure 14-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

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

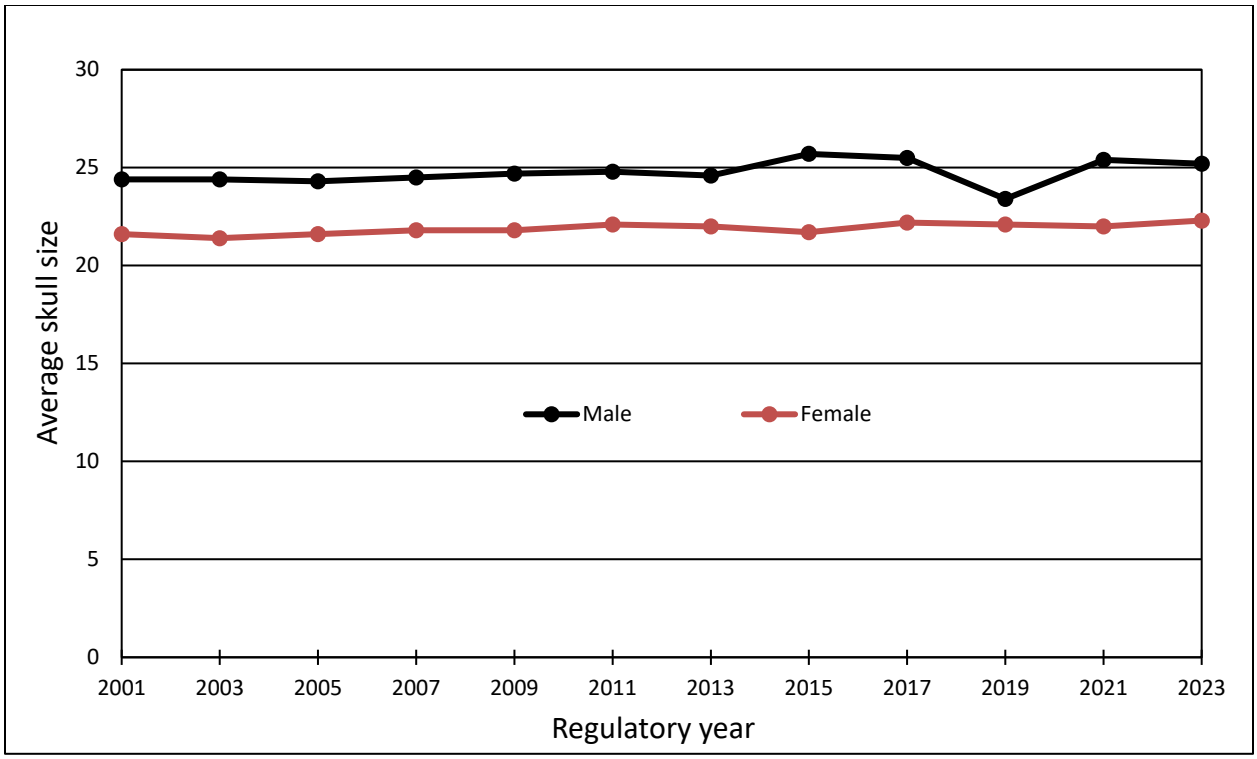

Figure 14-4. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

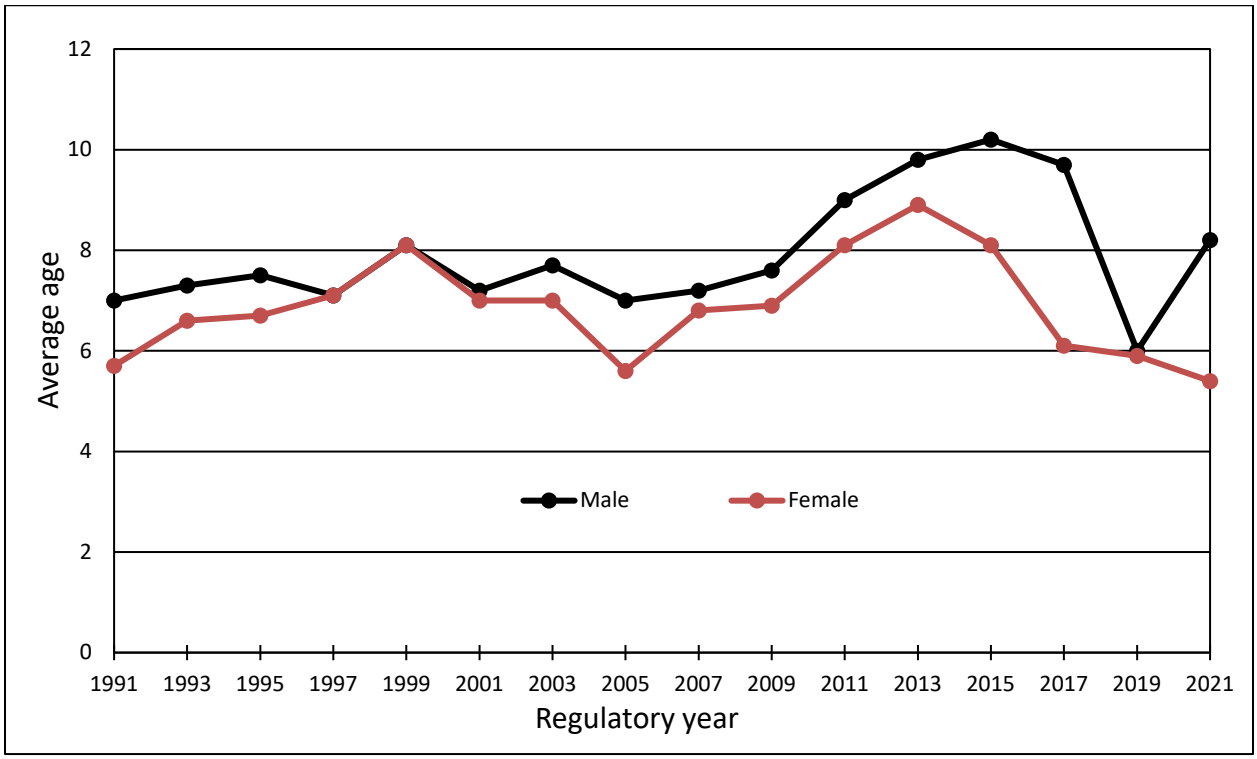

Figure 14-5. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

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

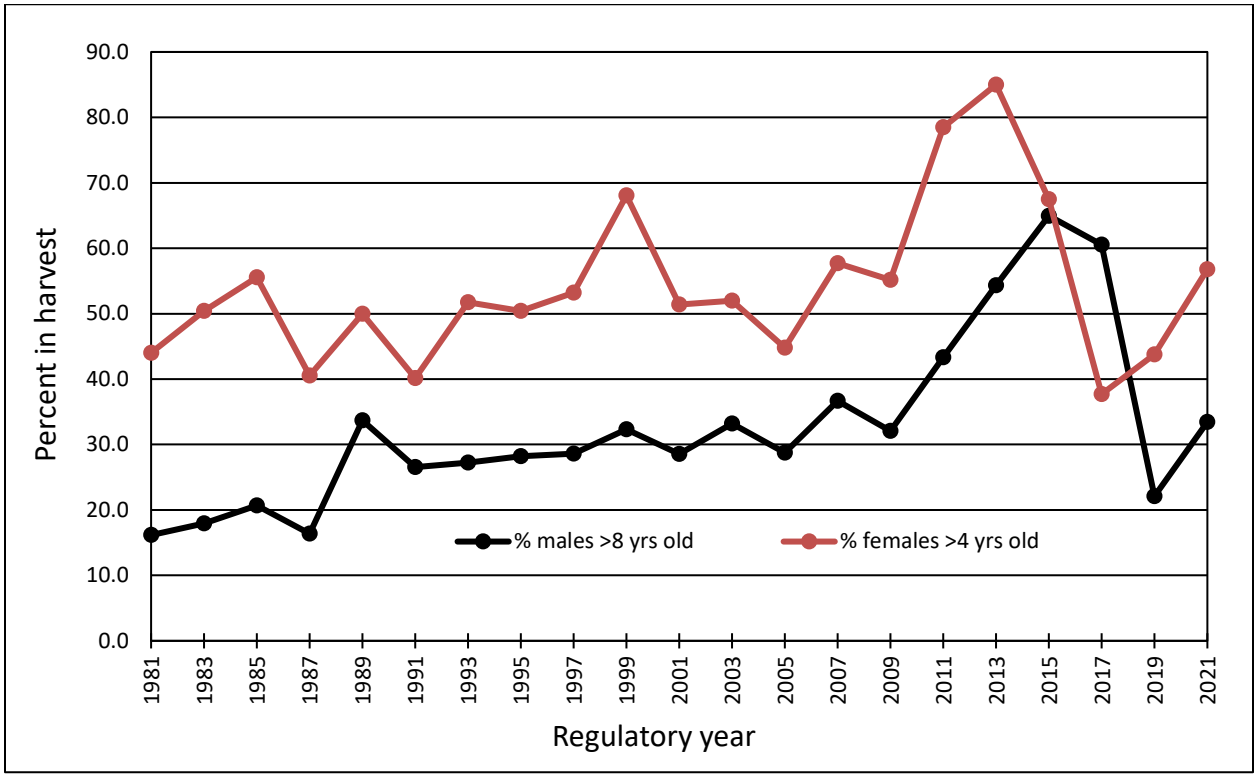

Figure 14-6. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

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

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

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

PROPOSED BY: Jordan Wallace & Dave Leonard

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

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

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

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

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

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

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

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

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

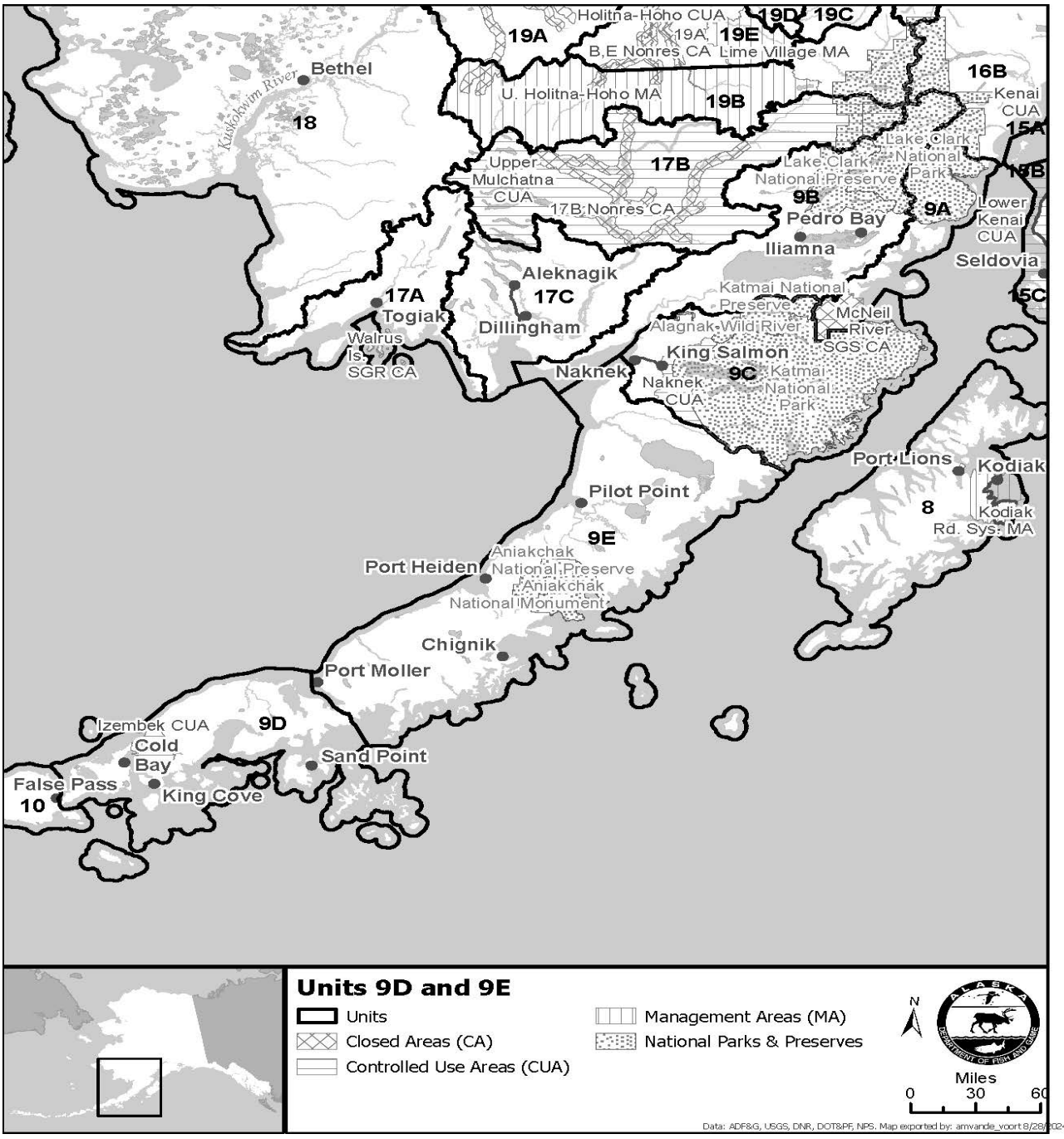

Figure 15-1. Game Management Units 9D and 9E on the Alaska Peninsula.

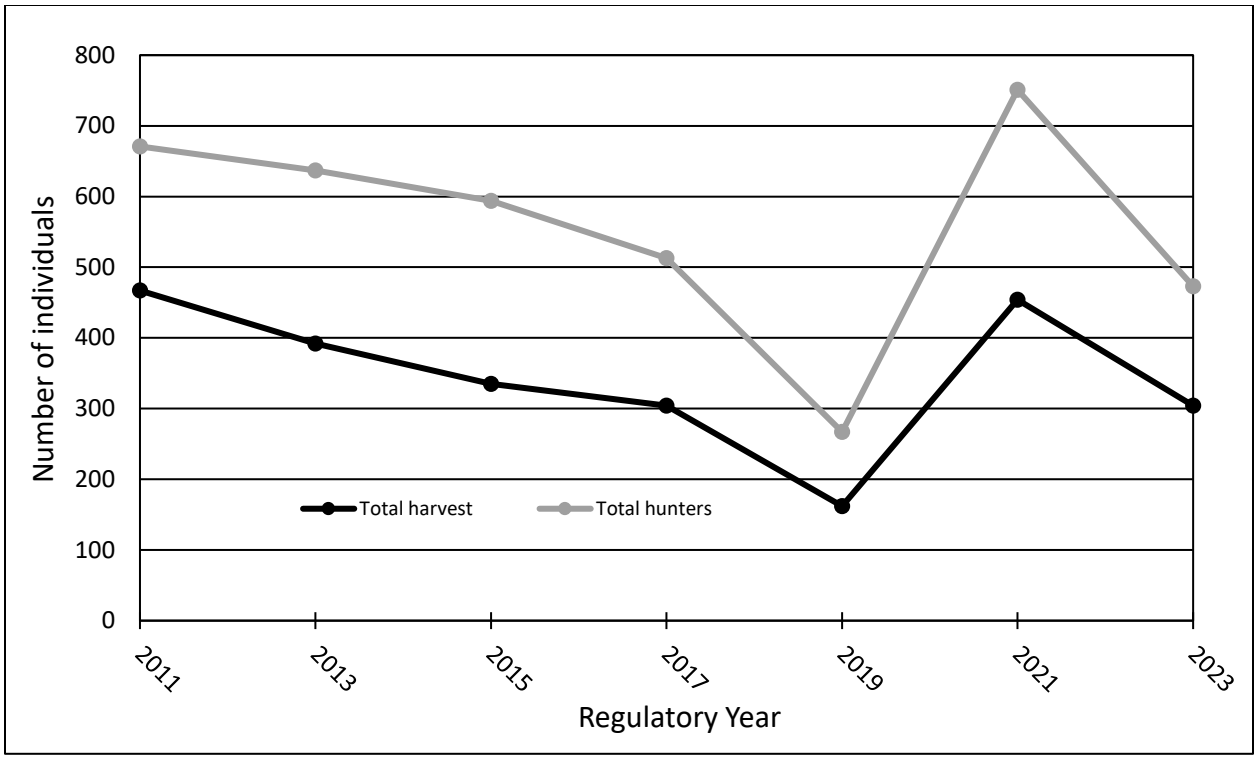

Figure 15-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

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

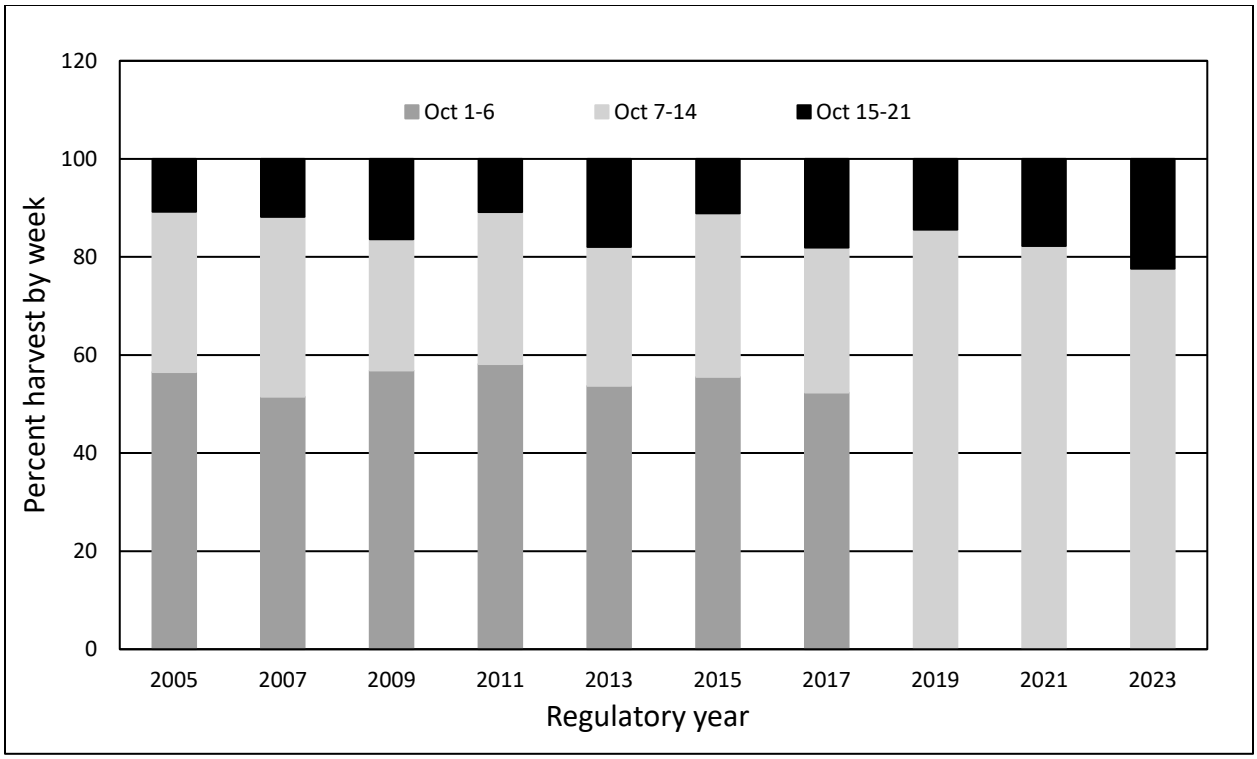

Figure 15-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

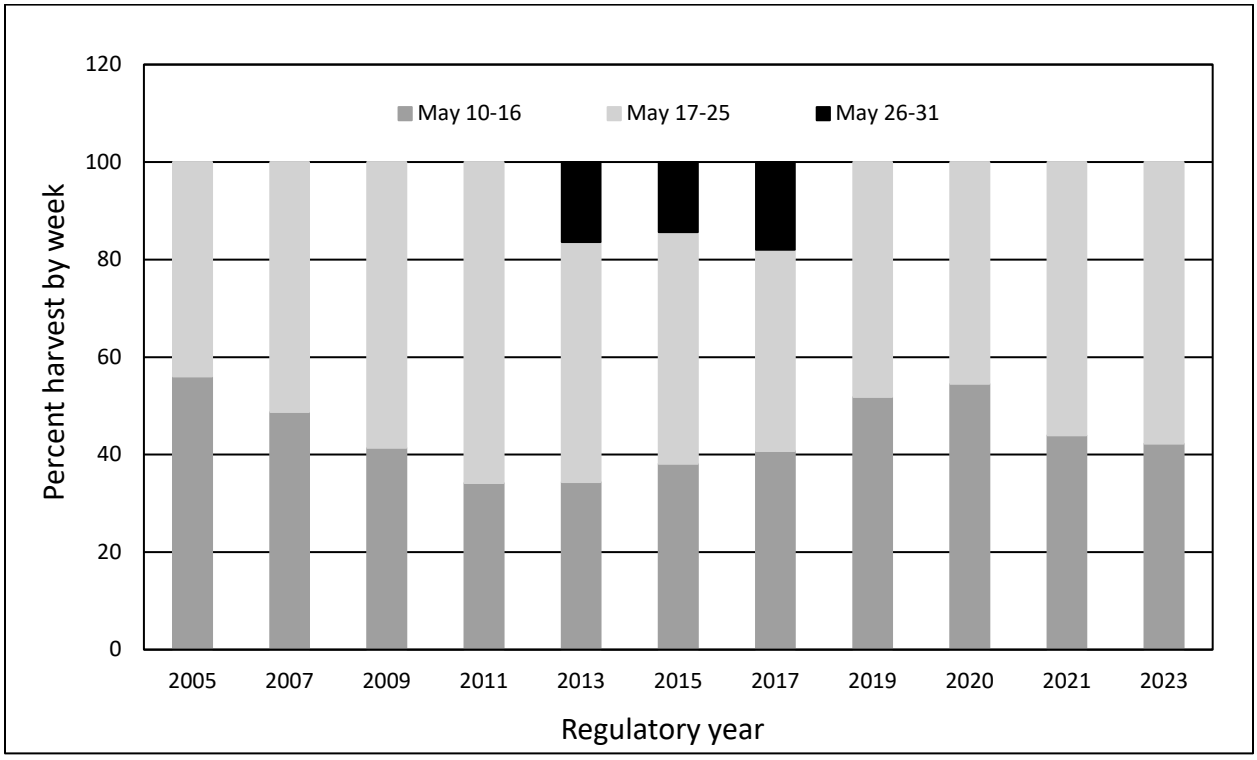

Figure 15-4. Spring harvest chronology for Units 9D and 9E, RY2005–2023.

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

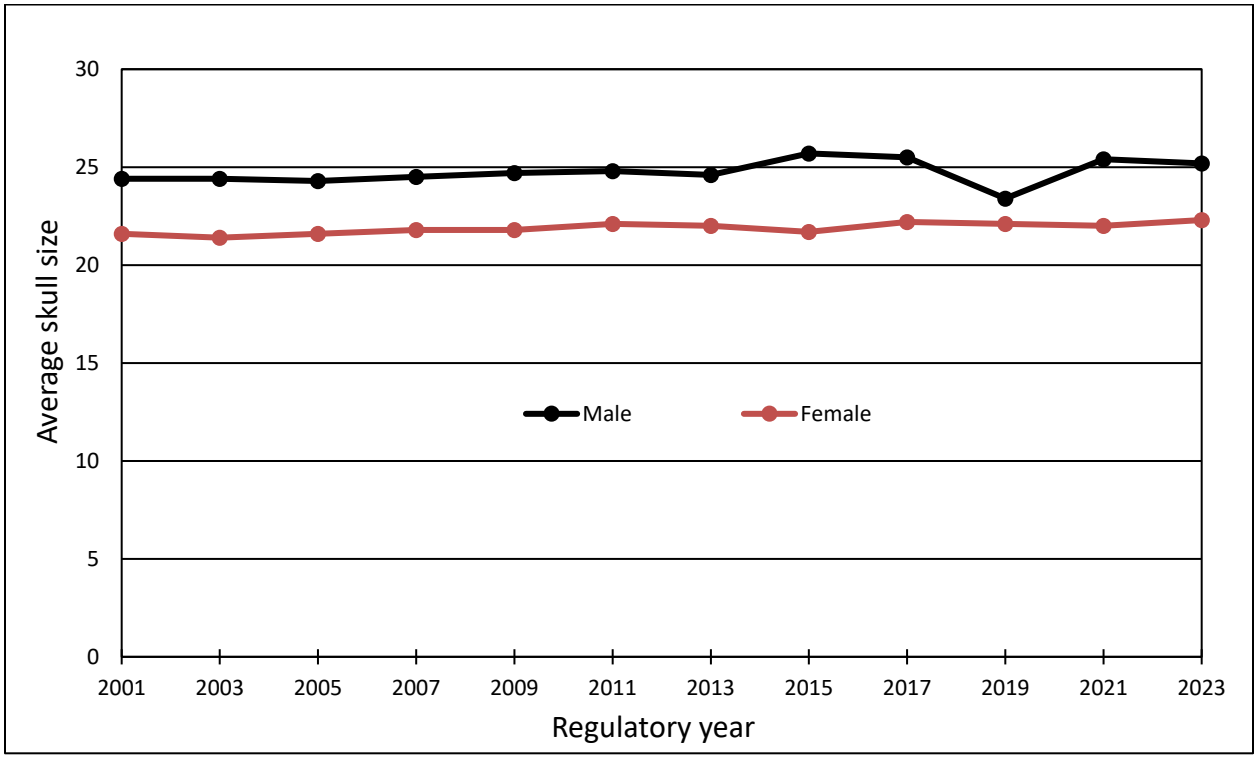

Figure 15-5. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

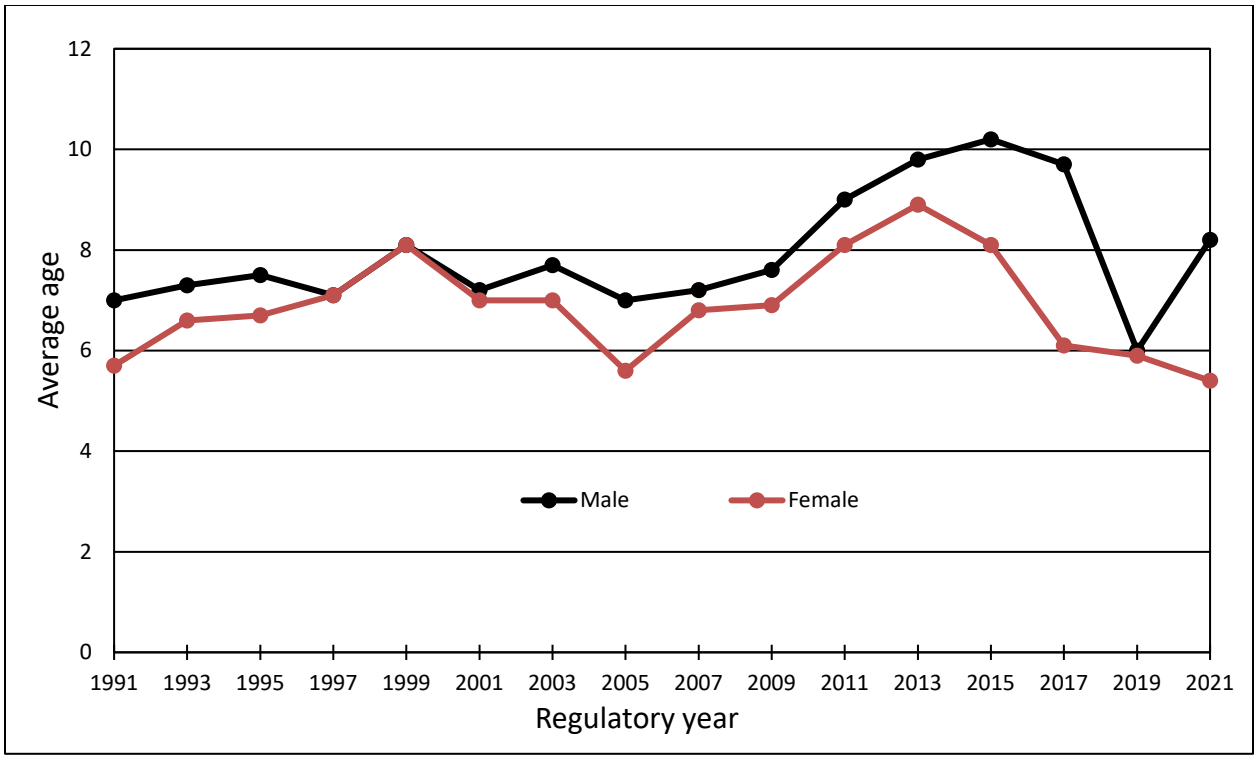

Figure 15-6. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

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

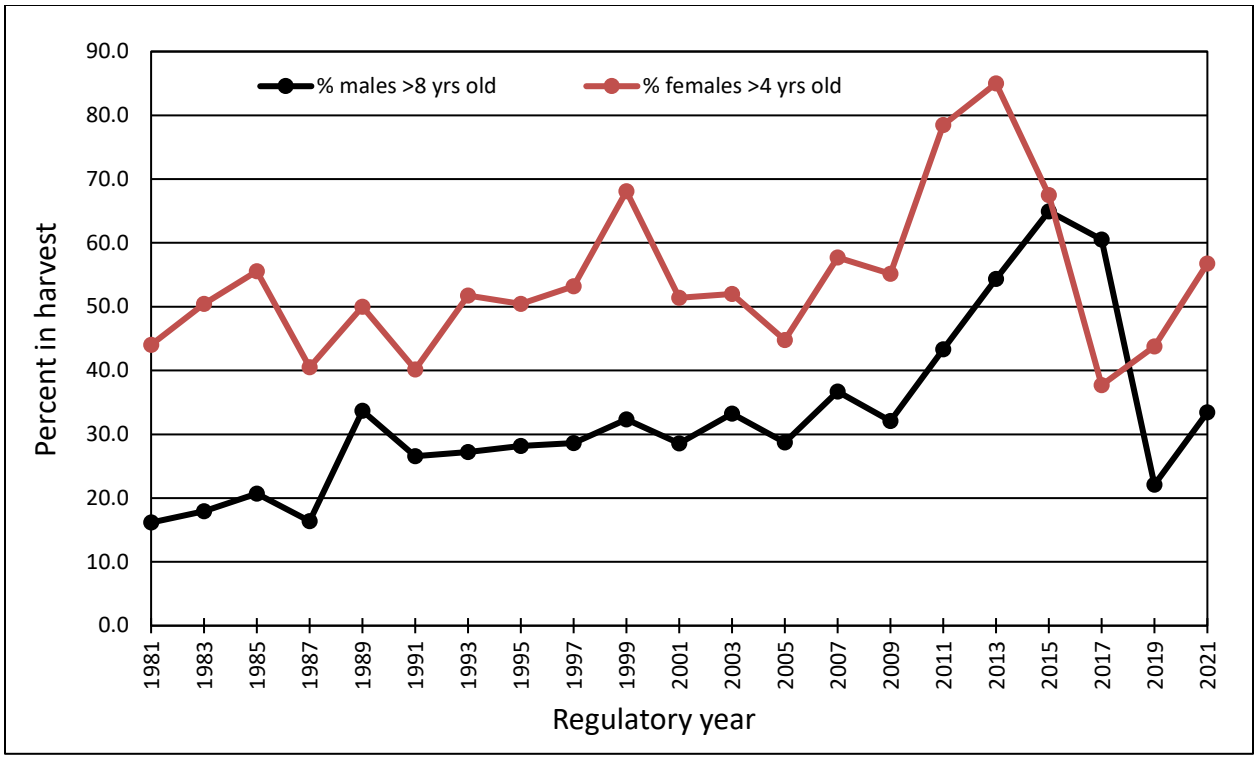

Figure 15-7. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

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

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

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

PROPOSED BY: Spencer Pape

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

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

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

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

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

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

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

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

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

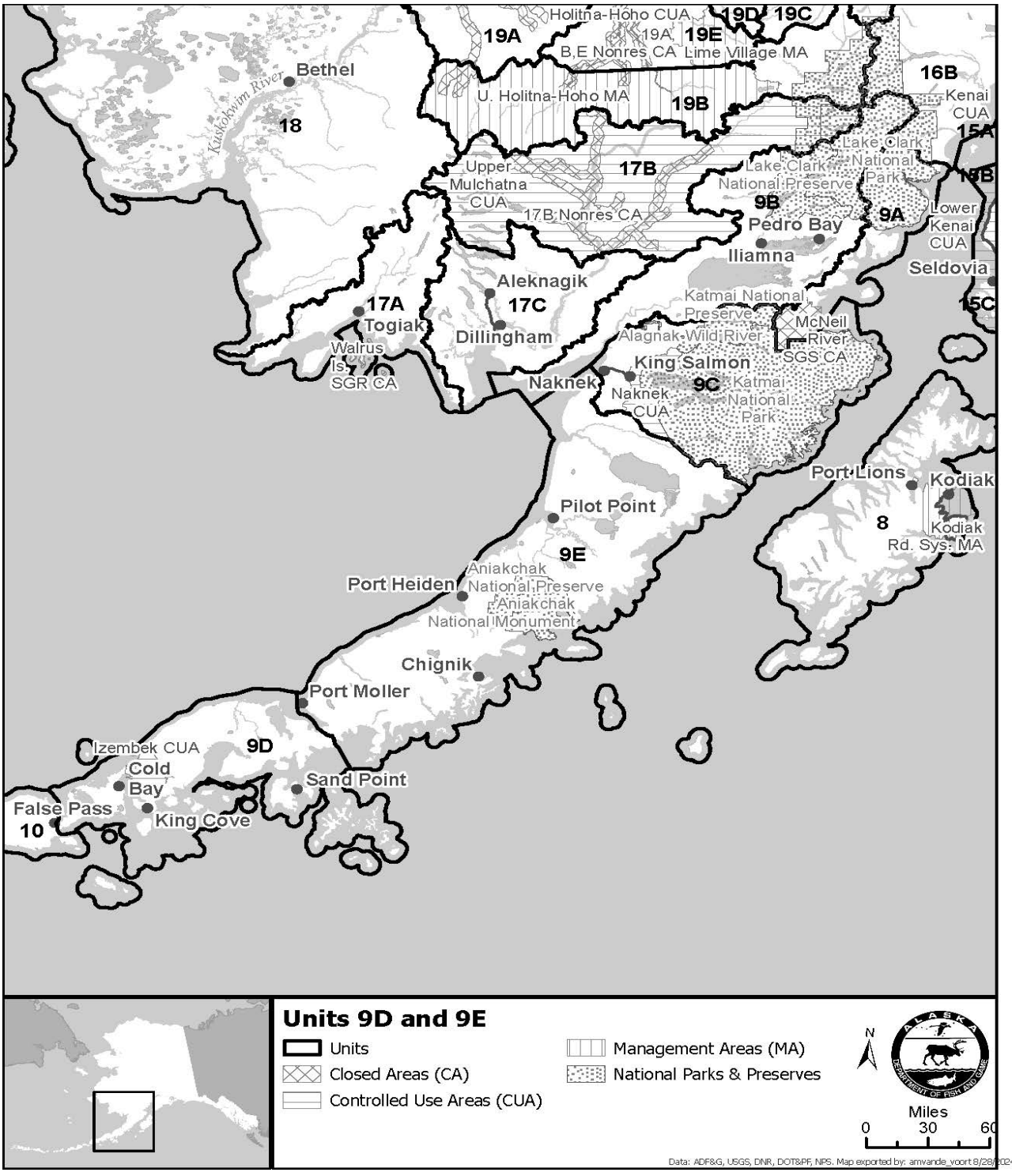

Figure 16-1. Game Management Units 9D and 9E on the Alaska Peninsula.

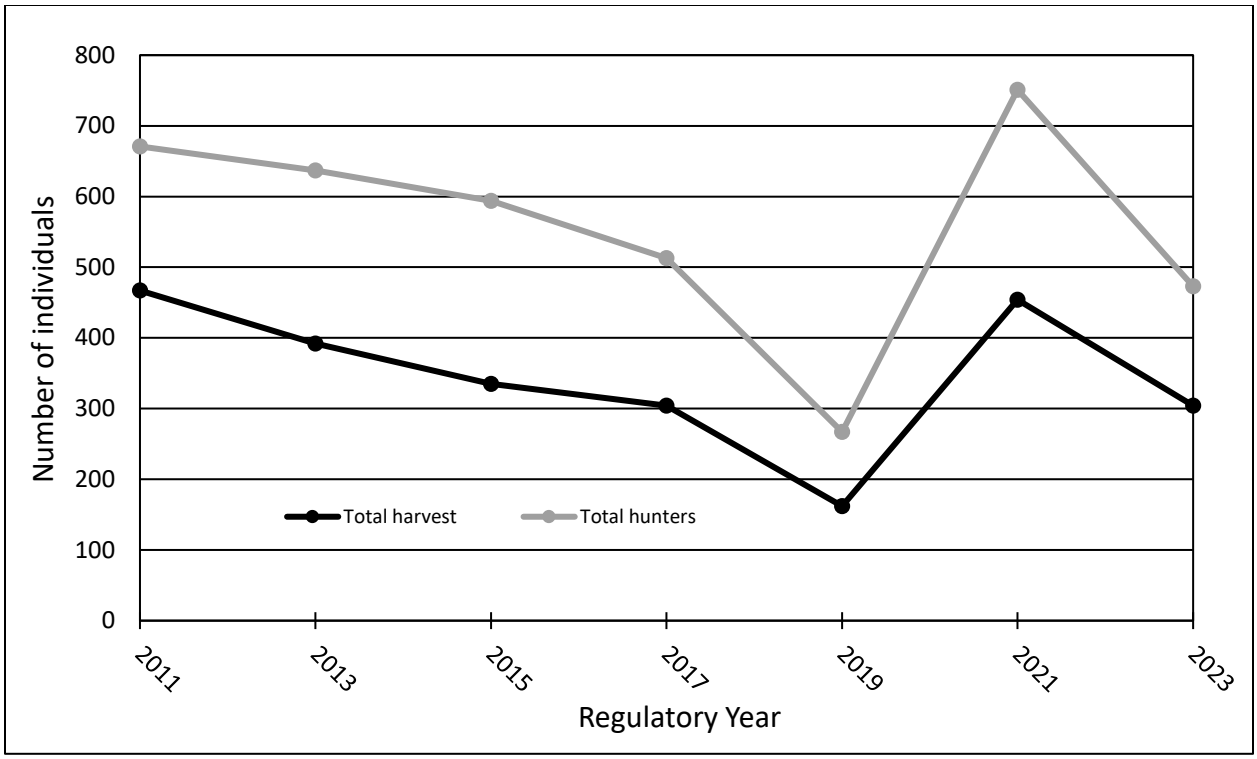

Figure 16-2. Total hunter participation and total brown bear harvest for Units 9D and 9E, RY2011–2023.

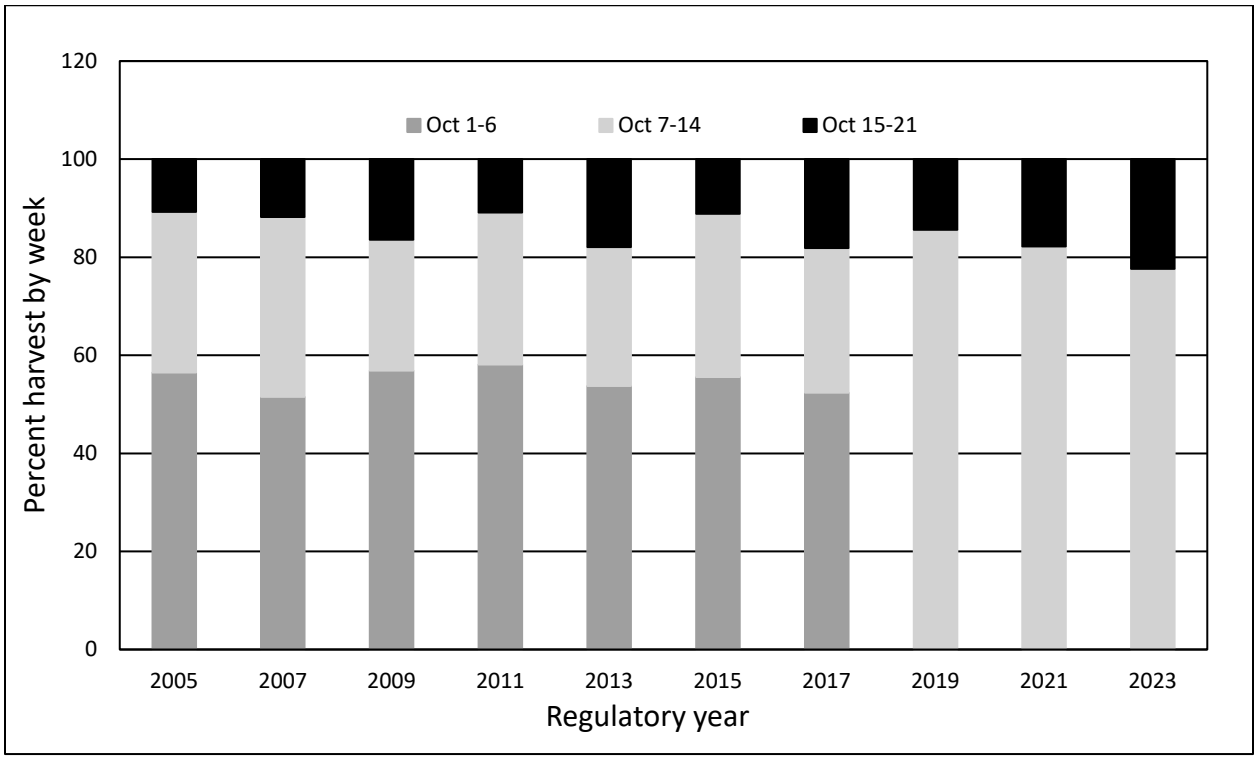

Figure 16-3. Fall harvest chronology for Units 9D and 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

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

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

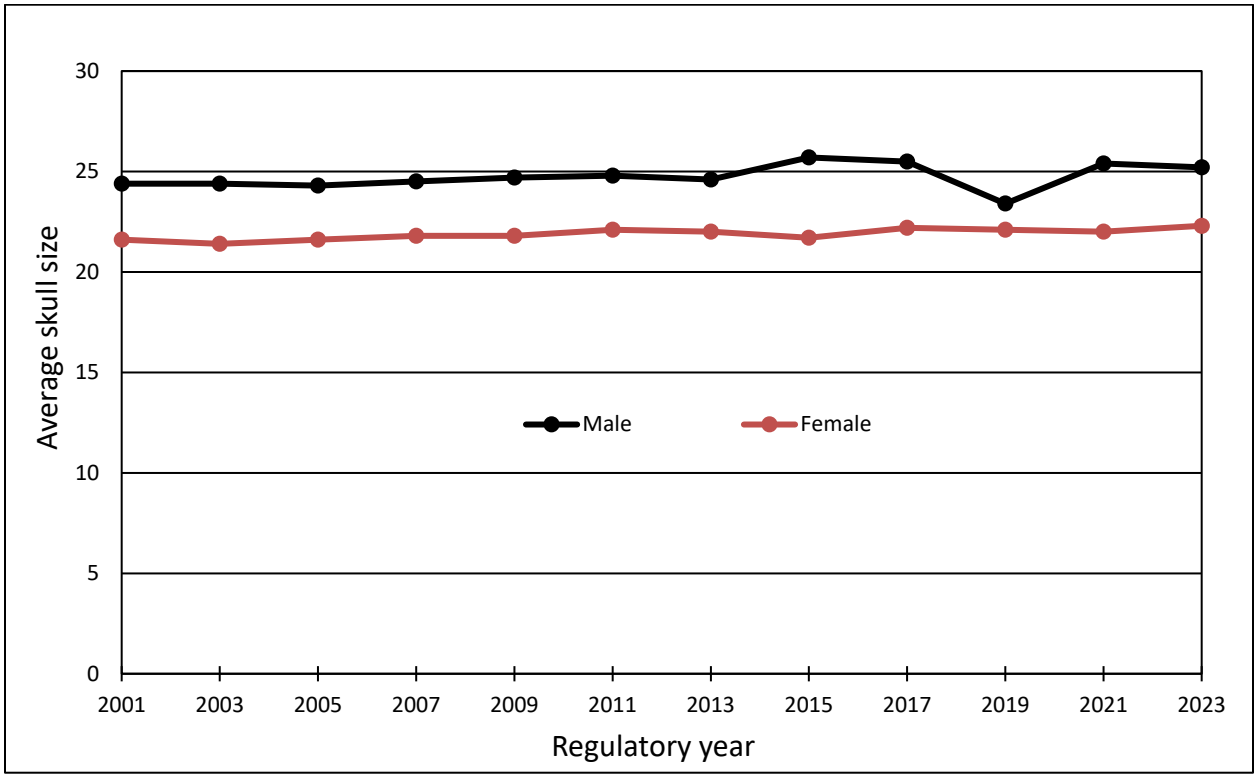

Figure 16-4. Average skull size of harvested male and female brown bears in Units 9D and 9E, RY2001–2023.

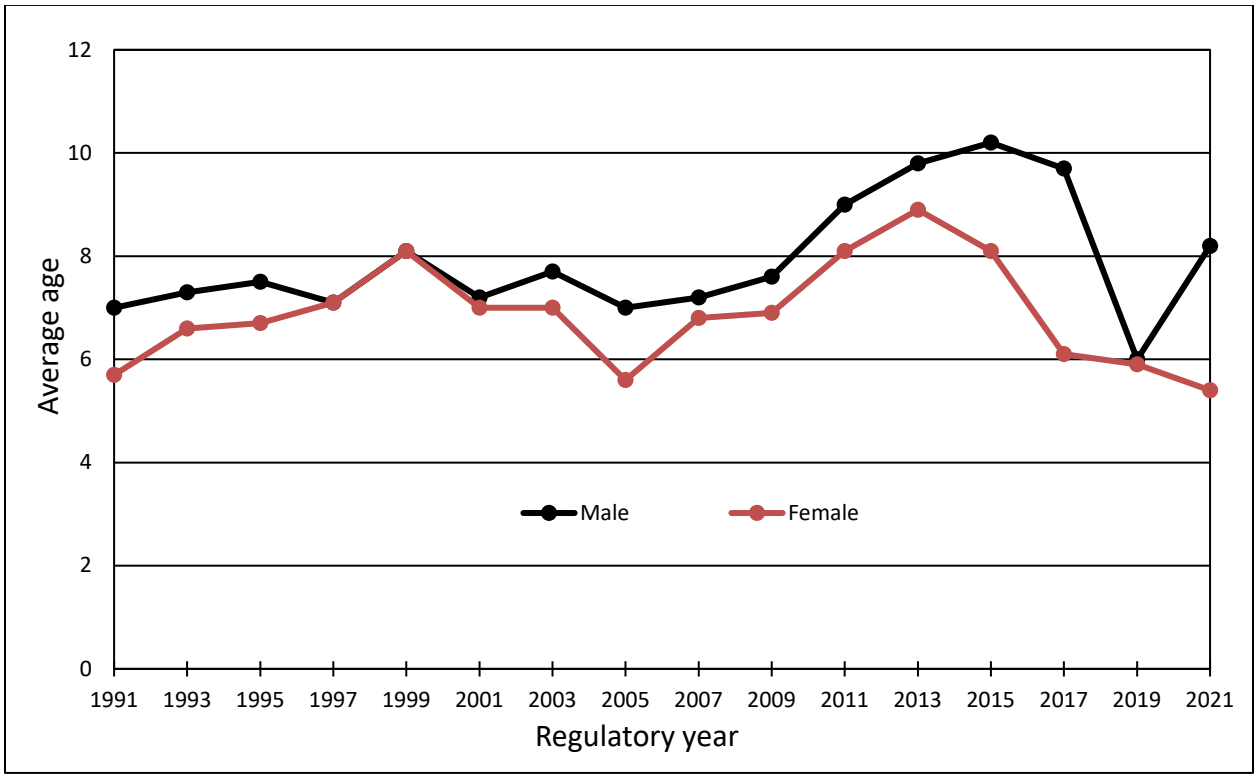

Figure 16-5. Average age of harvested male and female brown bears in Units 9D and 9E, RY 1991–2021.

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

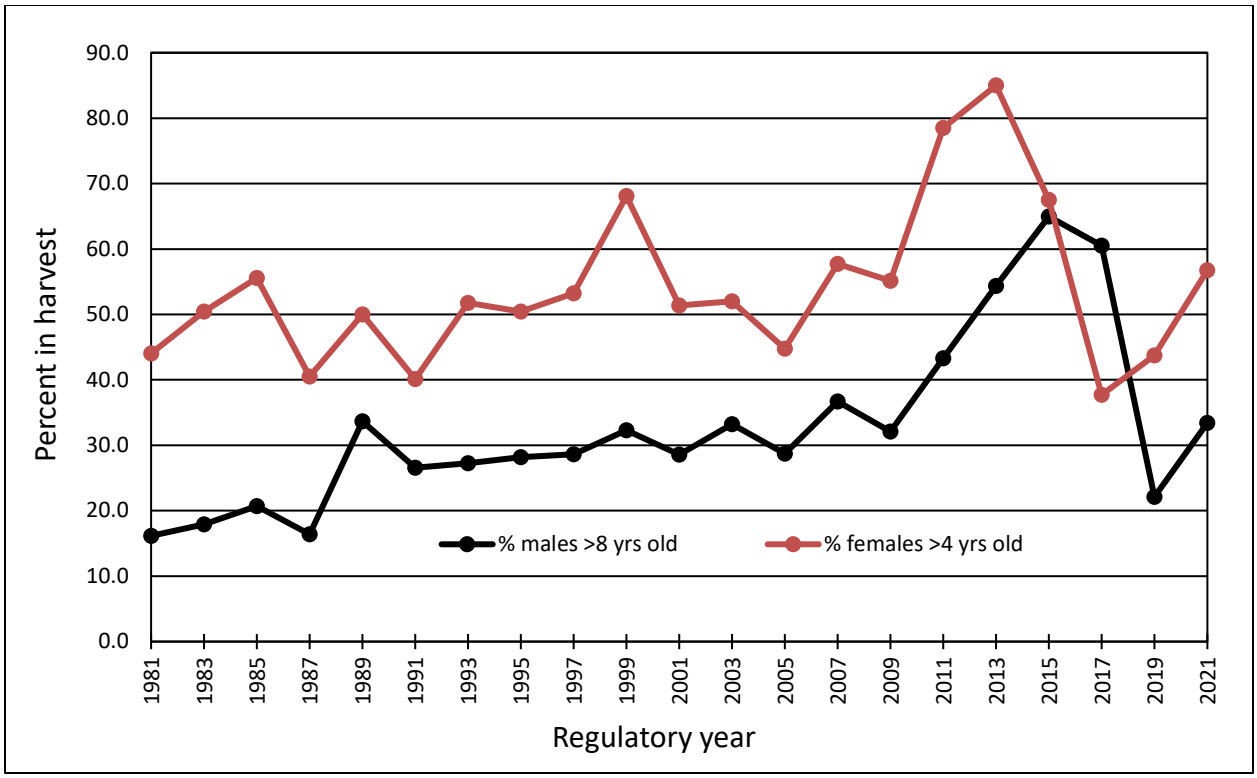

Figure 16-6. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest, regulatory years 1980 through 2021.

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

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

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

PROPOSED BY: Tracy Vrem

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

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

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

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

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

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

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

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

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

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

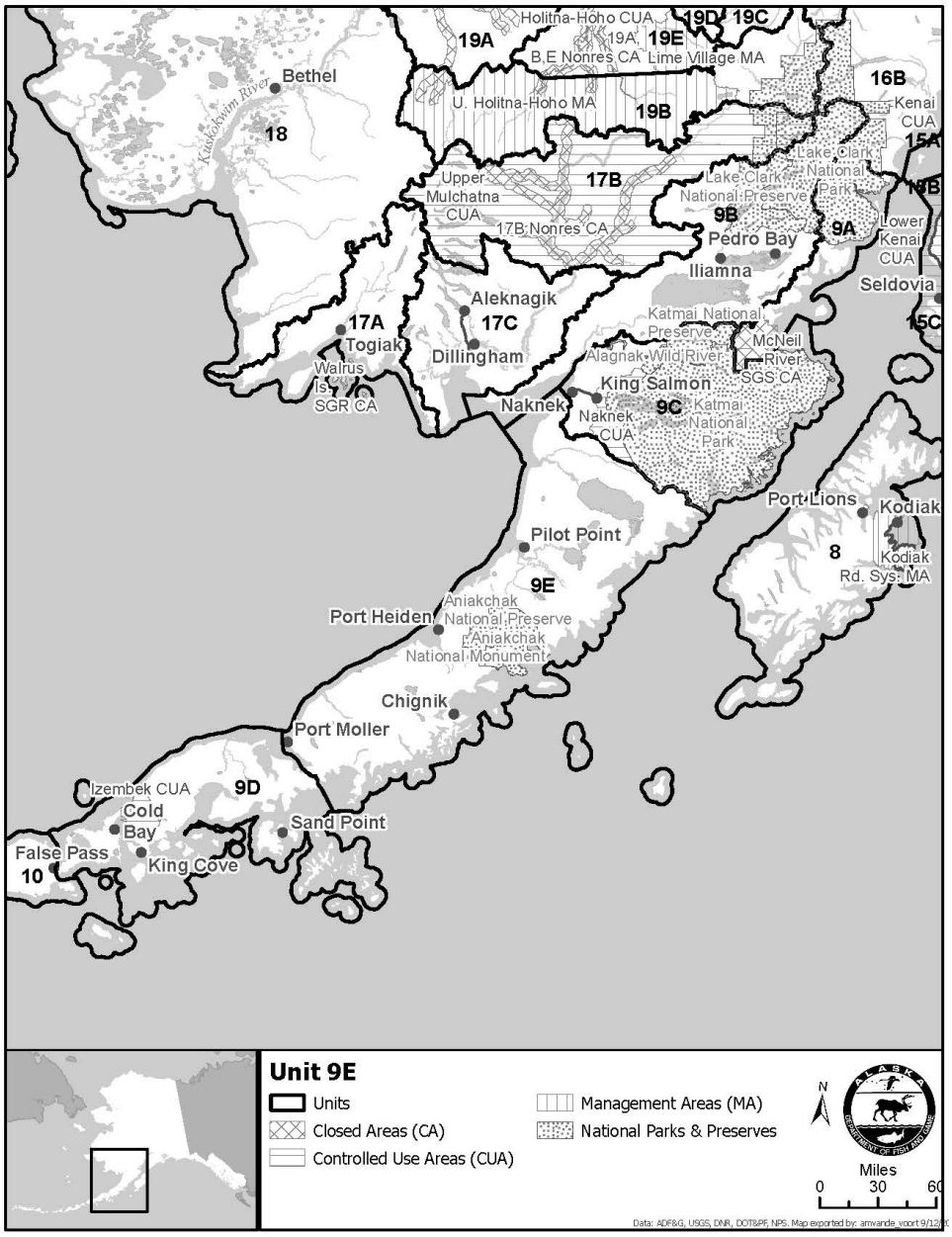

Figure 17-1. Game Management Unit 9E on the Alaska Peninsula.

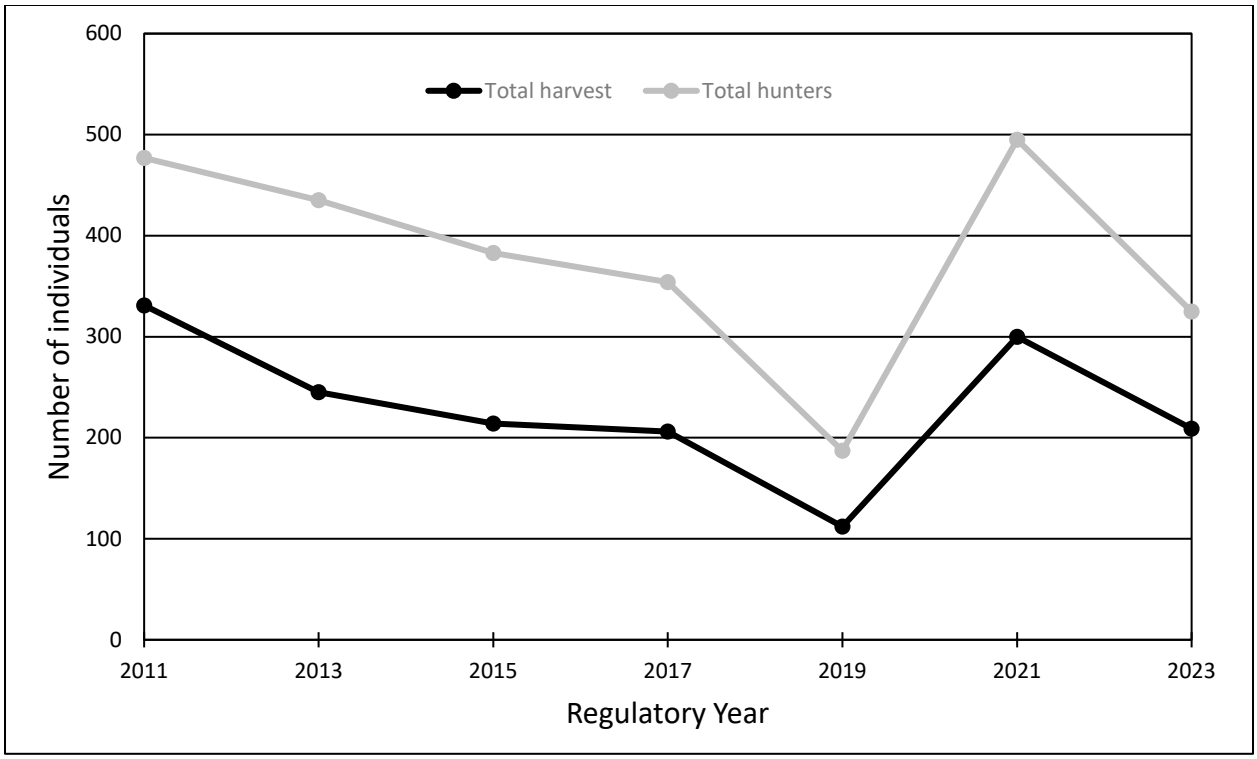

Figure 17-2. Total hunter participation and total brown bear harvest for Unit 9E, RY2011–2023.

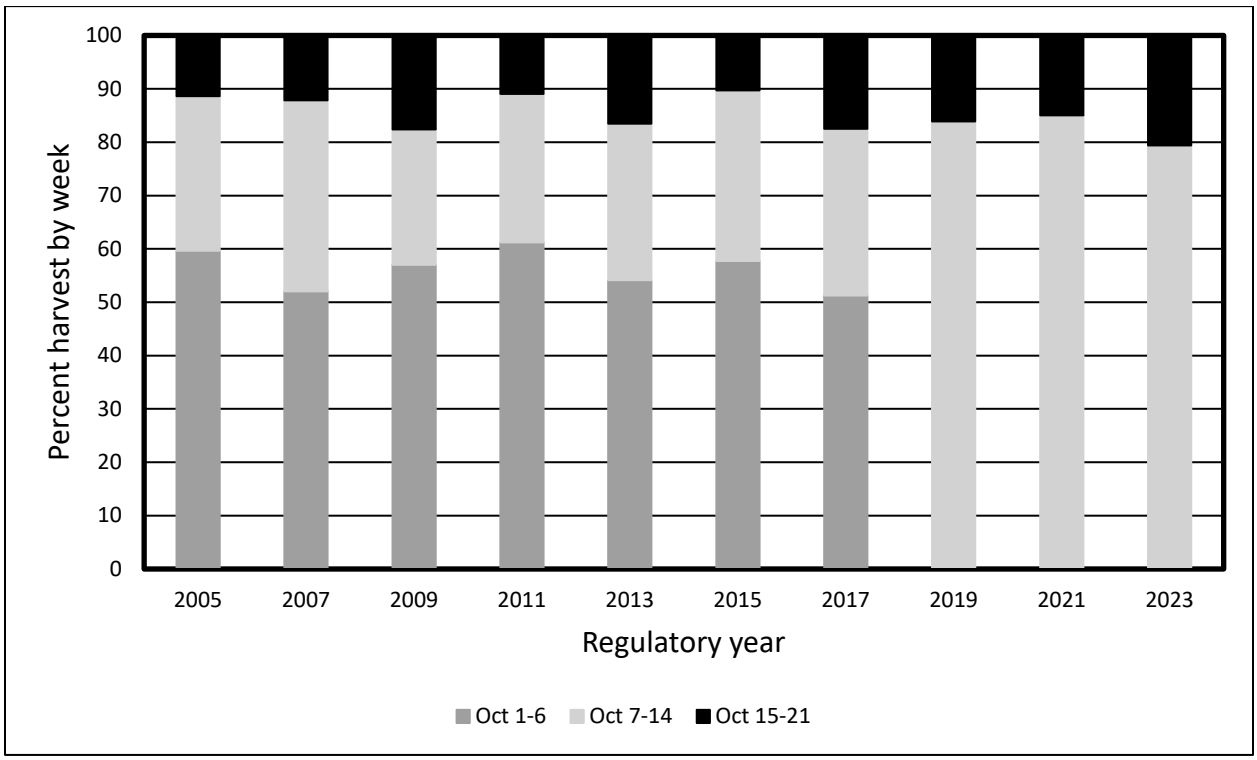

Figure 17-3. Fall harvest chronology for Unit 9E showing the addition of harvest to the second week of the hunt when the fall season was shortened starting in 2019, RY2005–2023.

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

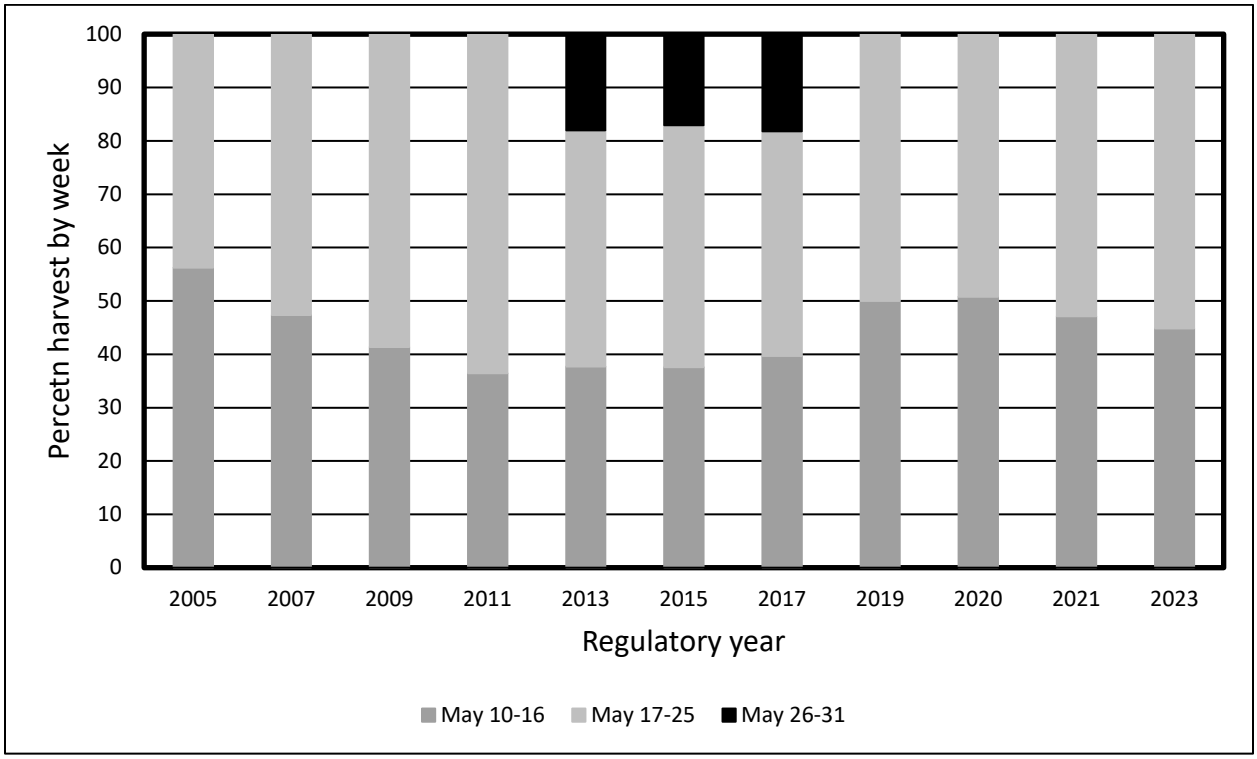

Figure 17-4. Spring harvest chronology for Unit 9E, RY2005–2023.

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

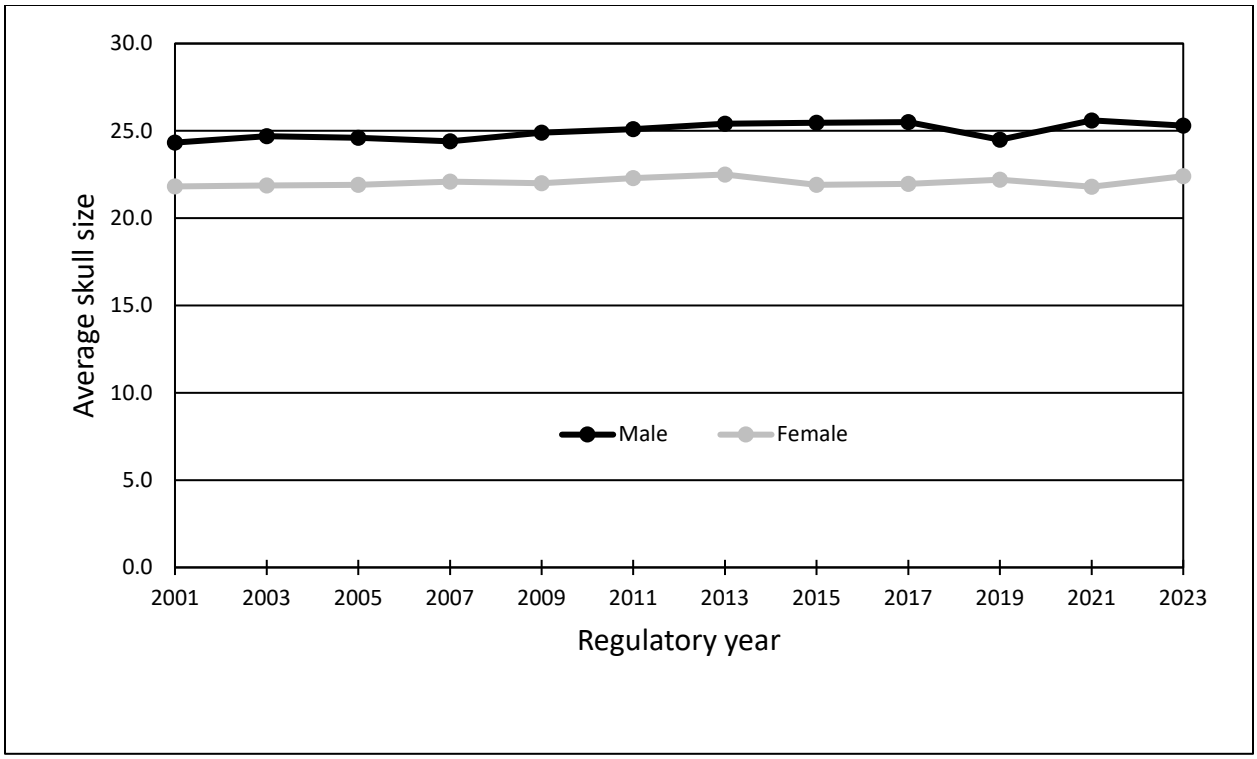

Figure 17-5. Average skull size of harvested male and female brown bears in Unit 9E, RY2001–2023.

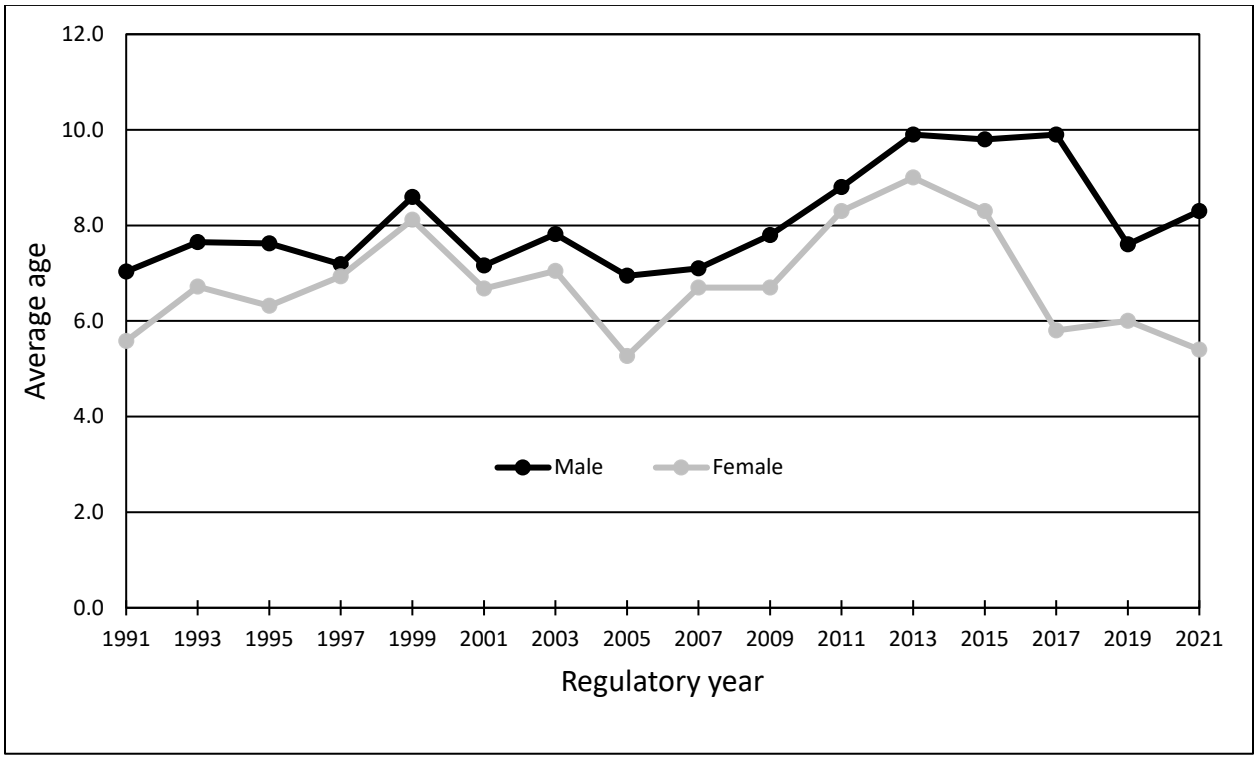

Figure 17-6. Average age of harvested male and female brown bears in Unit 9E, RY 1991–2021.

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

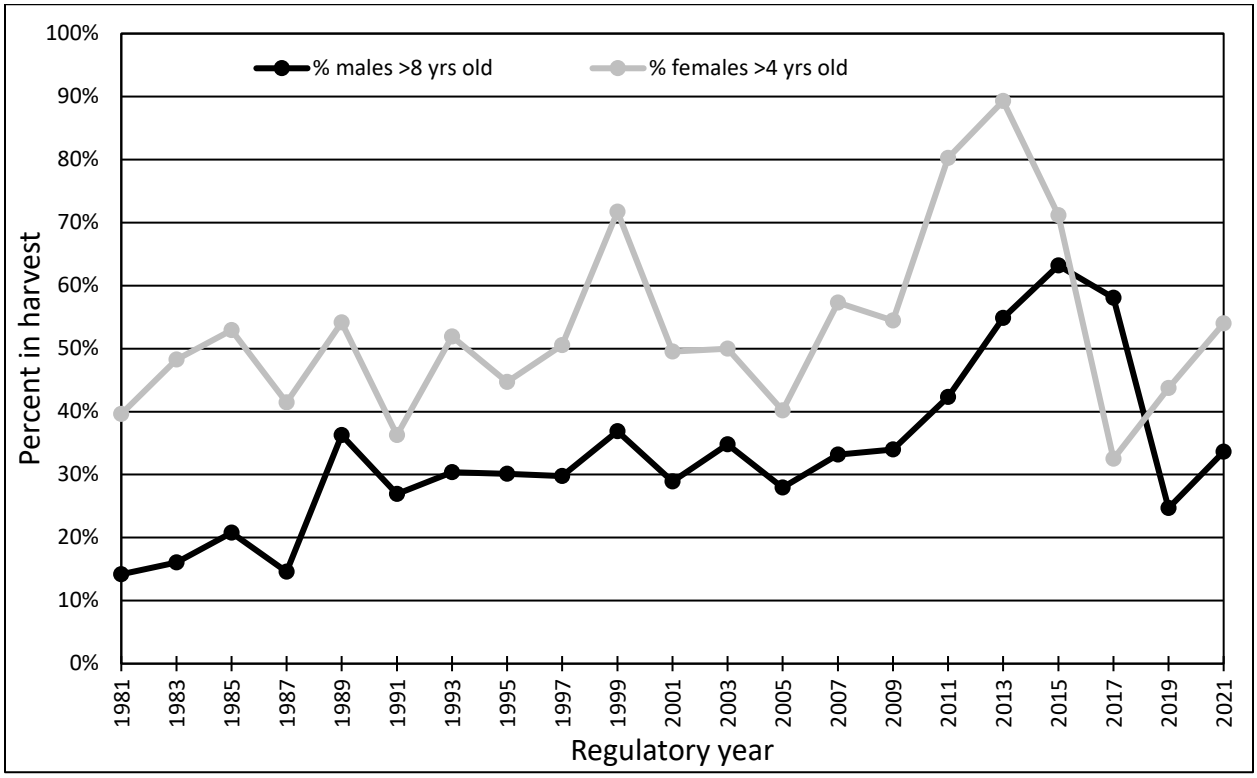

Figure 17-7. Percent males greater than 8 years old and percent females greater than 4-years-old in the harvest in Unit 9E, regulatory years 1981 through 2021.

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

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

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

PROPOSED BY: David Bachrach

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

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

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

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

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

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

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

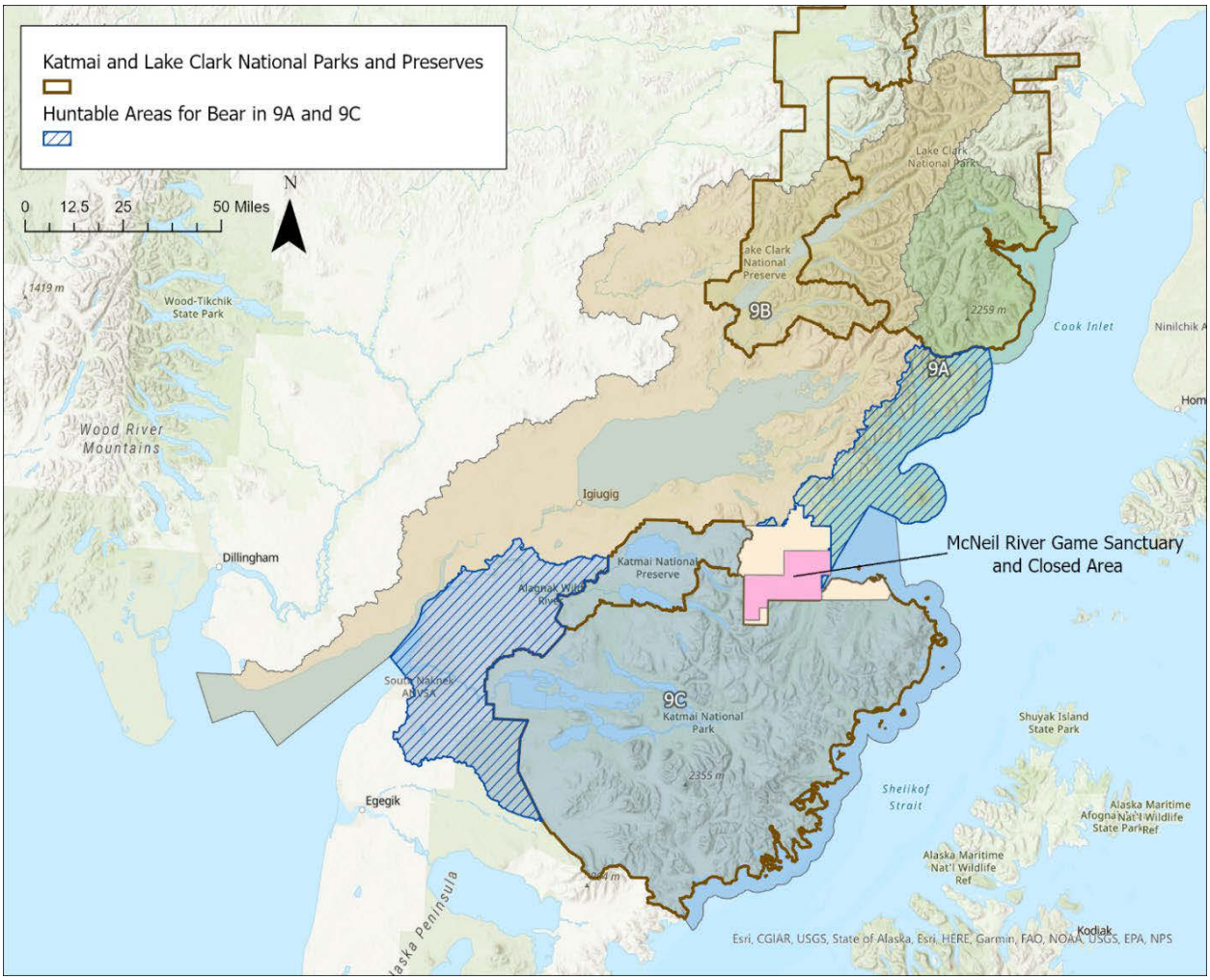

Figure 18-1. Unit 9C is composed primarily of Katmai National Park and Preserve and a western area of state and private lands. Katmai National Park is closed to hunting. Katmai National Preserve is open to hunting.

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

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

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

[a] Fall season only
[b] Spring (2021) season only
[c] Total hunters include unsuccessful resident and nonresident hunters.

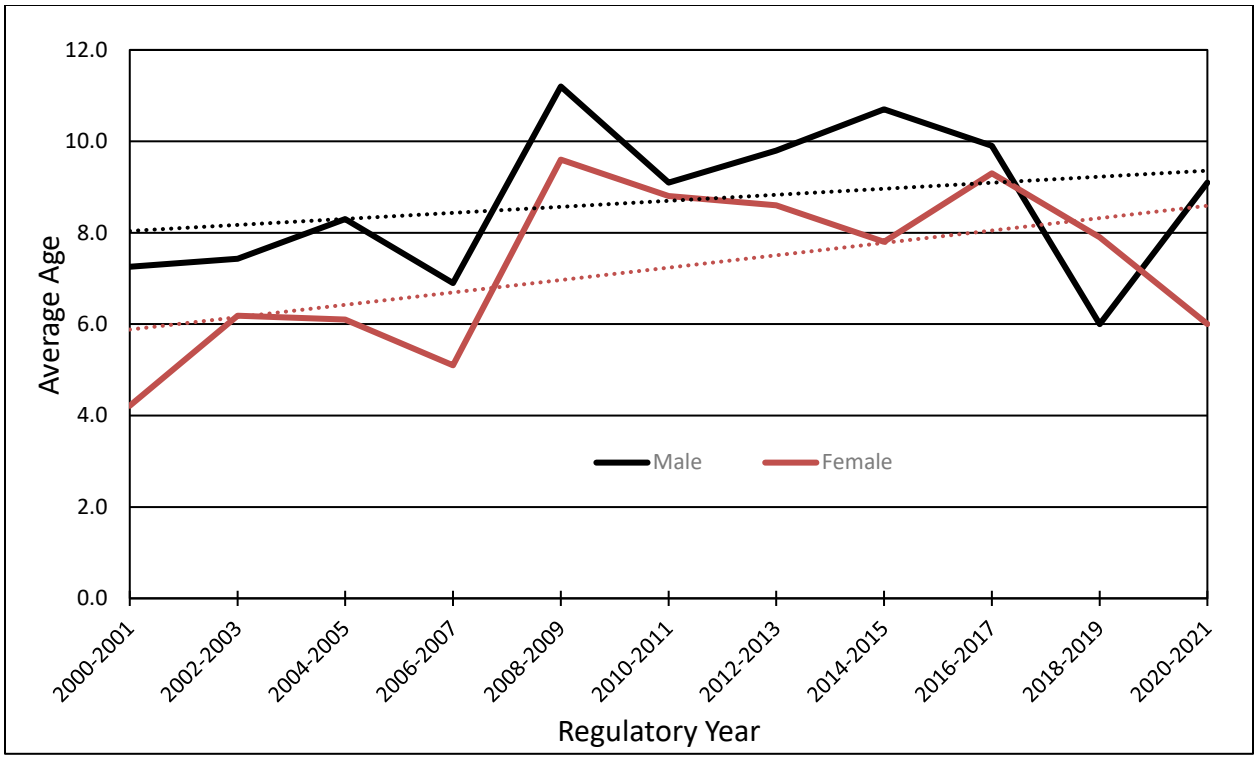

Figure 18-2. Average ages of male and female brown bears harvested in Unit 9C, regulatory years 2001–2021.

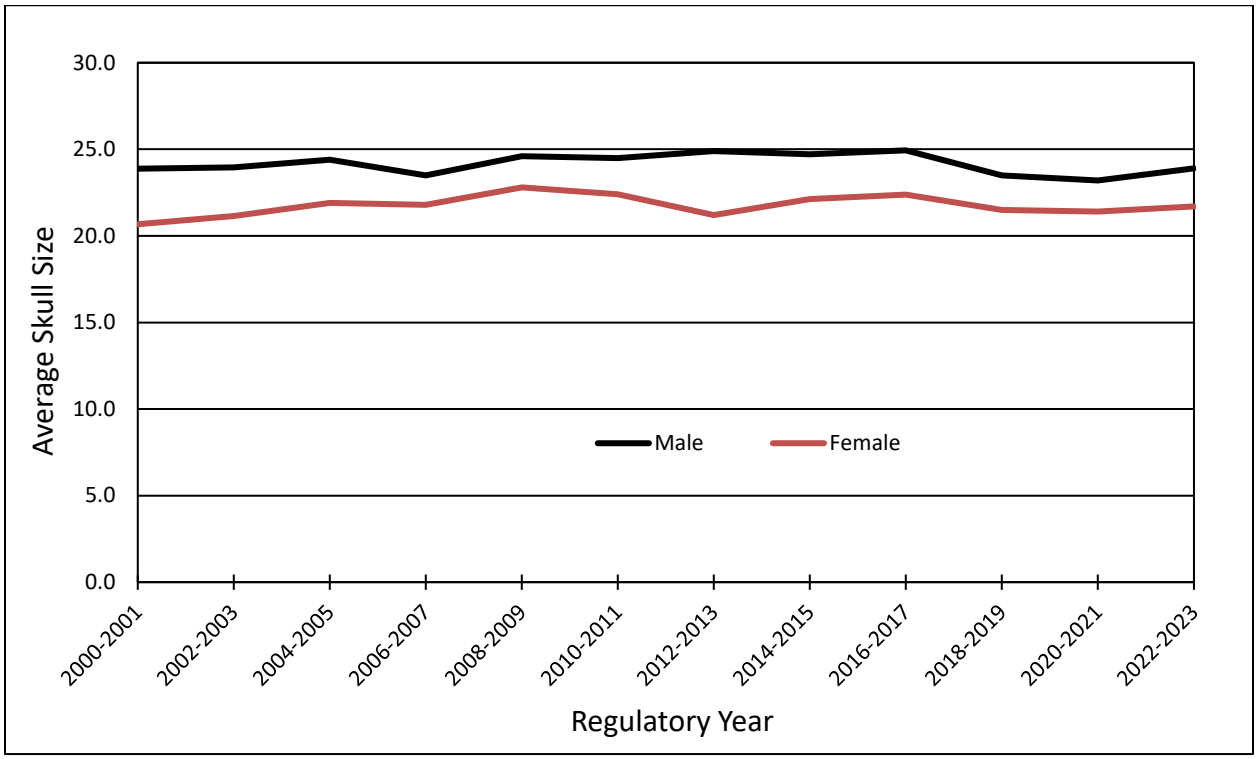

Figure 18-3. Average skull sizes of male and female brown bears harvested in Unit 9C, regulatory years 2001–2023.

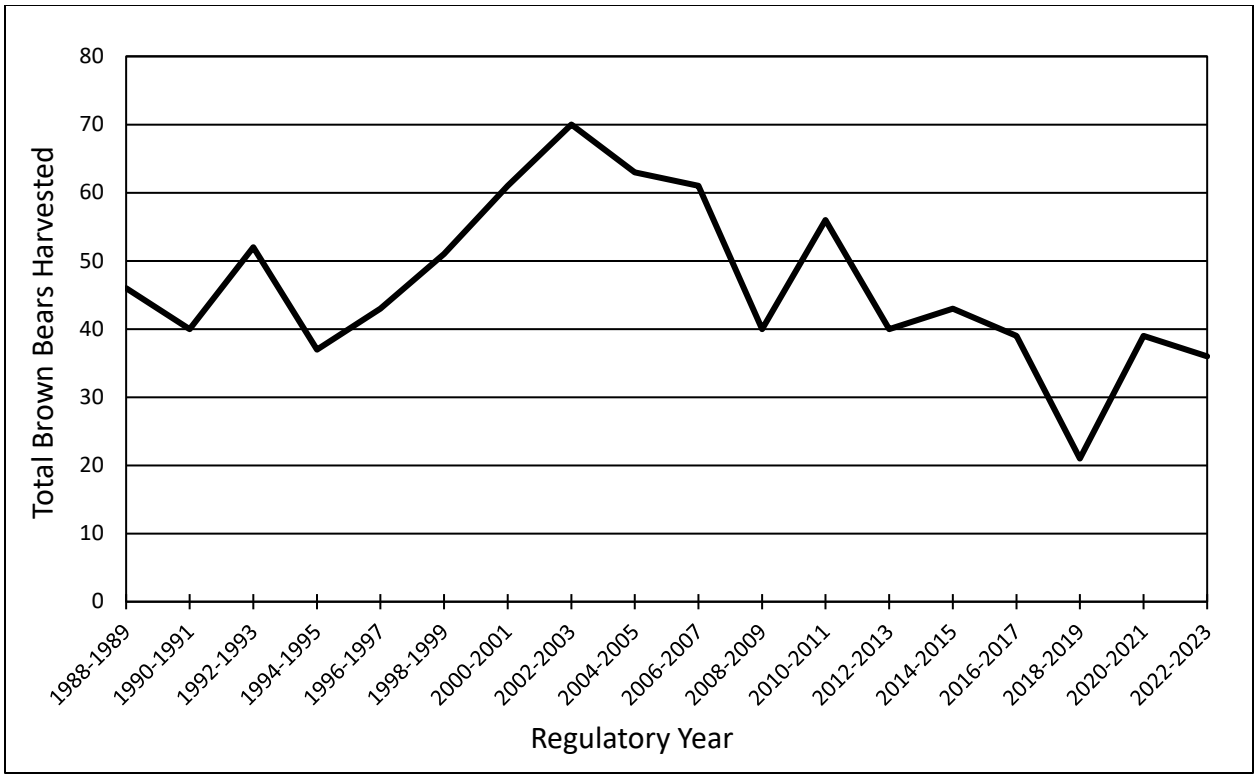

Figure 18-4. Total numbers of brown bears harvested in Unit 9C, regulatory years 1989–2023. Includes harvest from RB525.

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

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

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

PROPOSED BY: Paula White

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

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

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

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

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

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

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

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

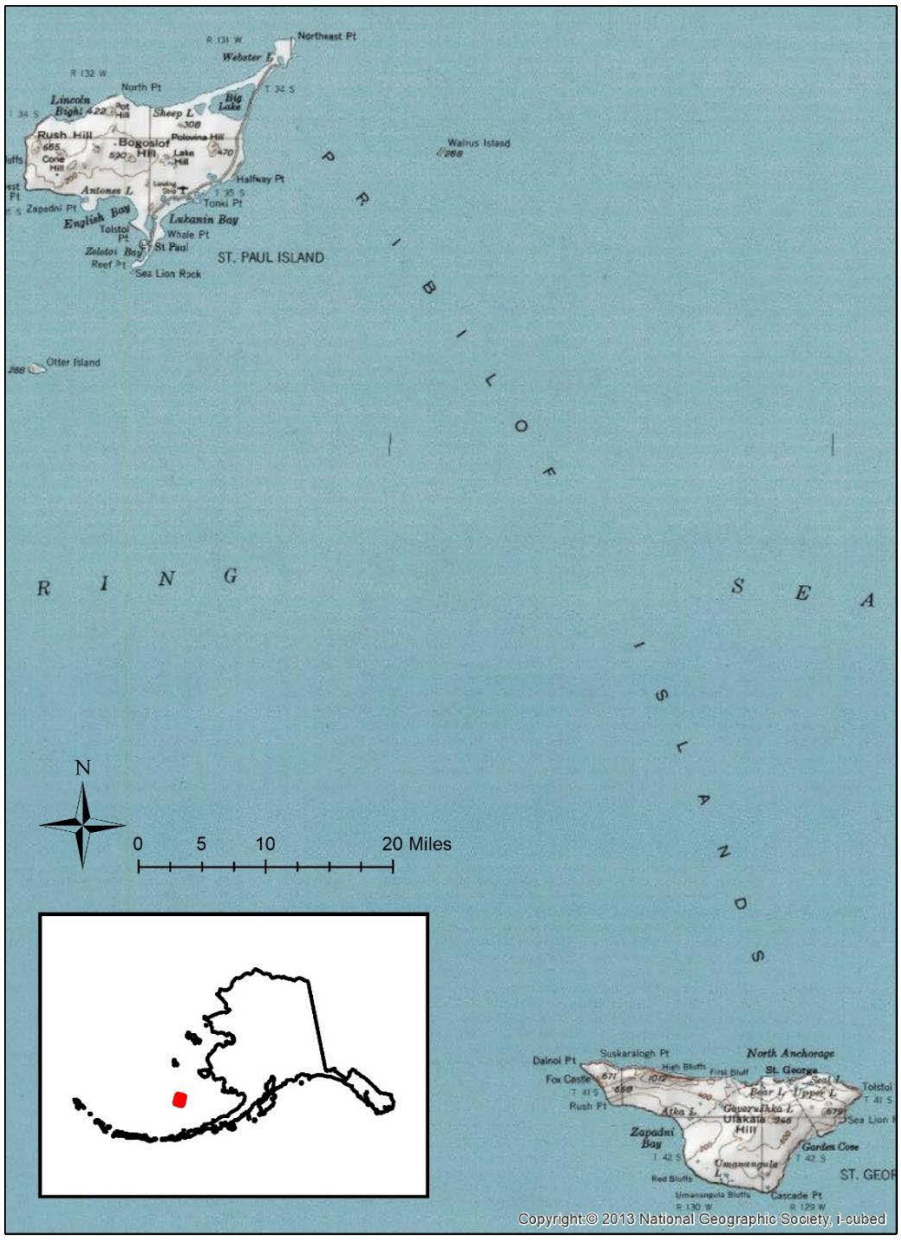

Figure 19-1. St. Paul and St. George Islands, Pribilof Islands, Unit 10.

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

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

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

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

PROPOSED BY: Paula White

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

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

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

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

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

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

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

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

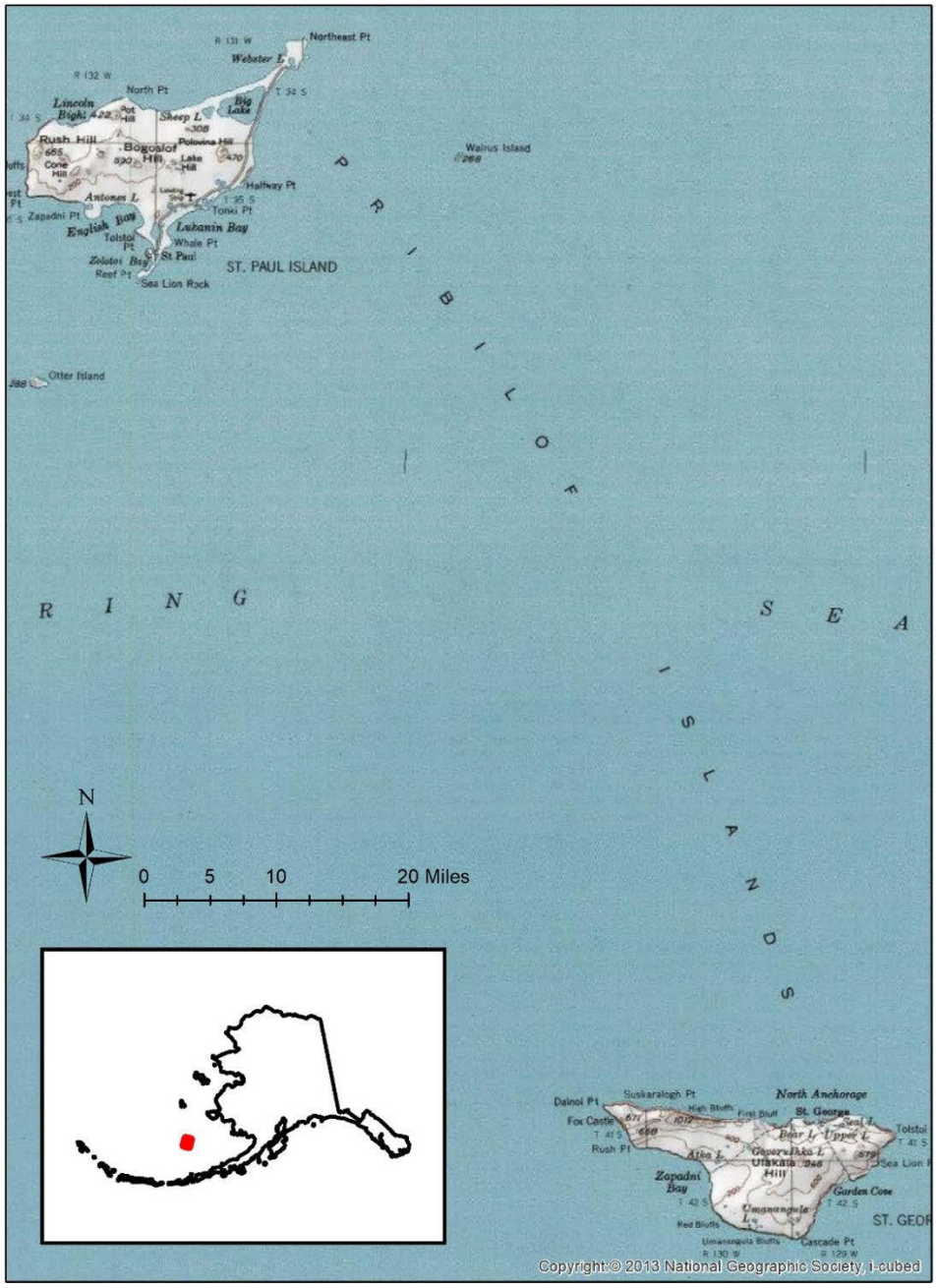

Figure 20-1. St. Paul and St. George Islands, Pribilof Islands, Unit 10

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

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

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

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

PROPOSED BY: Alaska Department of Fish and Game

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

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

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

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

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

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

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

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

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

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

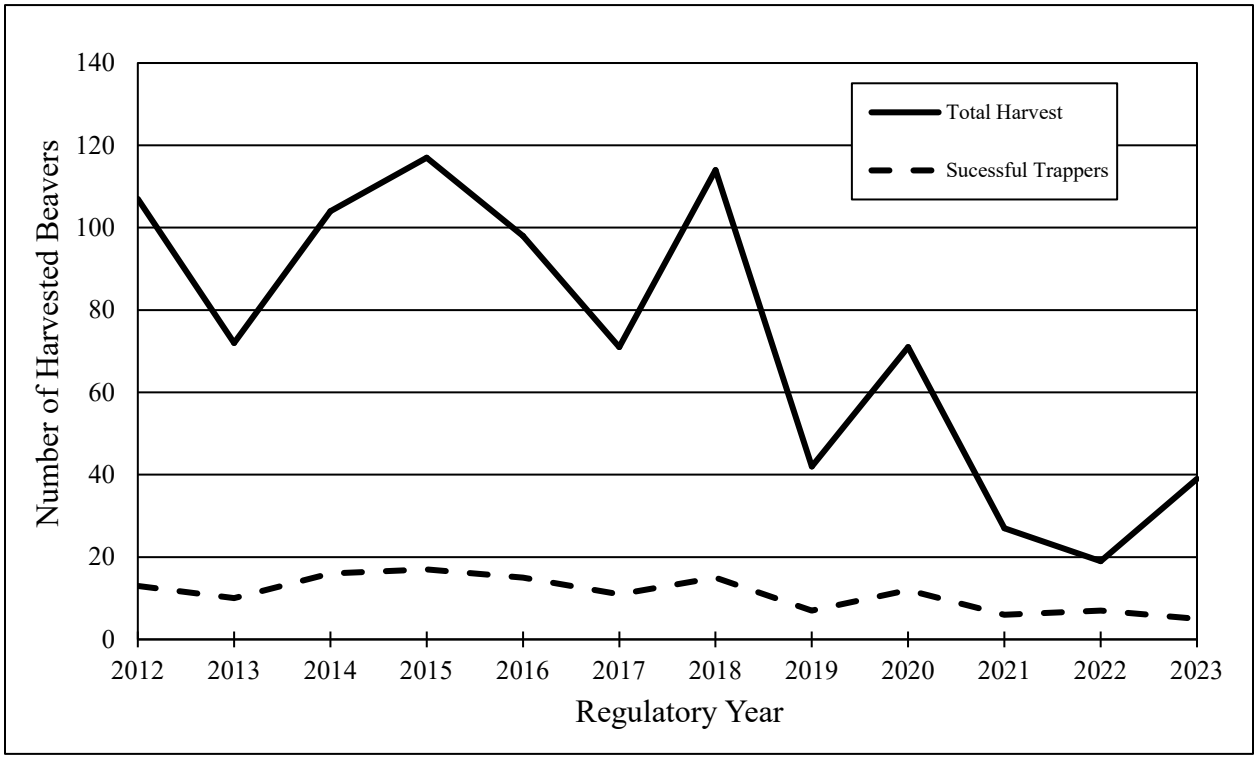

Figure 21-1. Number of harvested beaver and successful trappers in Unit 9, regulatory years 2012–2023.

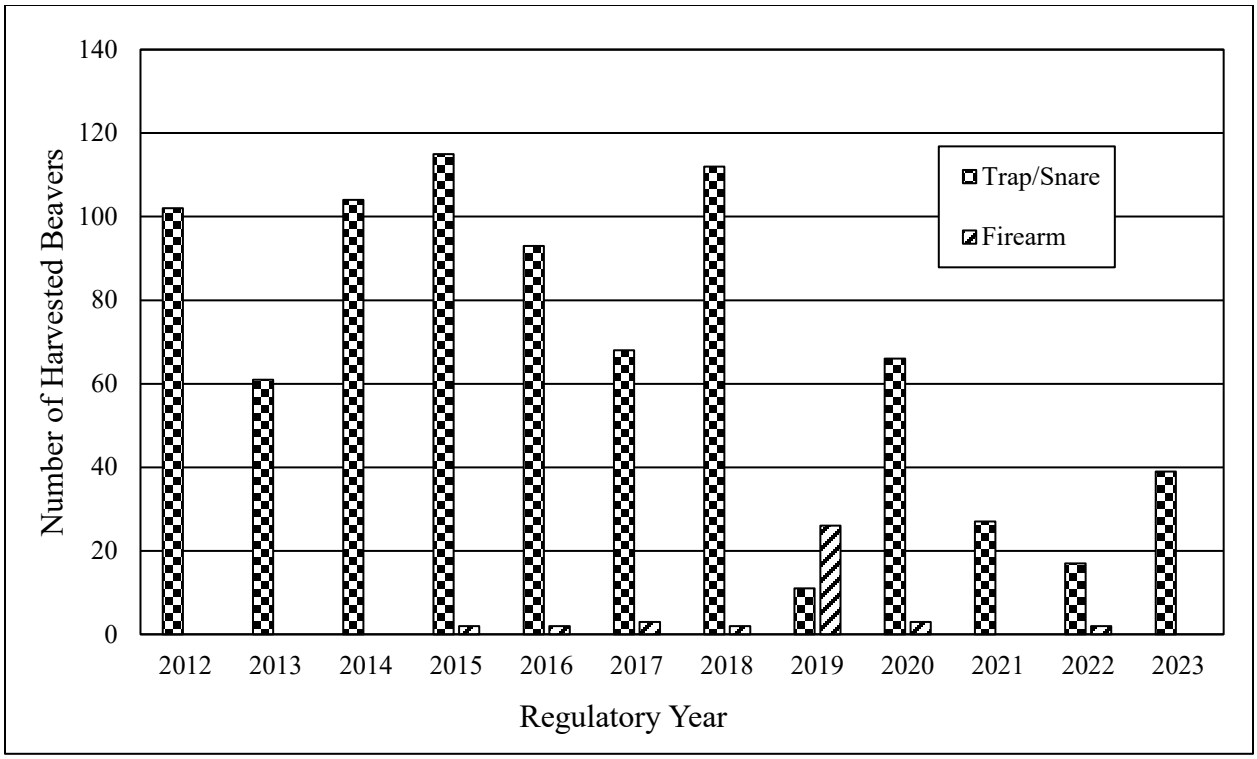

Figure 21-2. Unit 9 beaver harvest by method of take 2012–2023, excludes beaver taken by unknown method.

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

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

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

PROPOSED BY: Graham Morrison

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

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

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

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

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

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

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

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

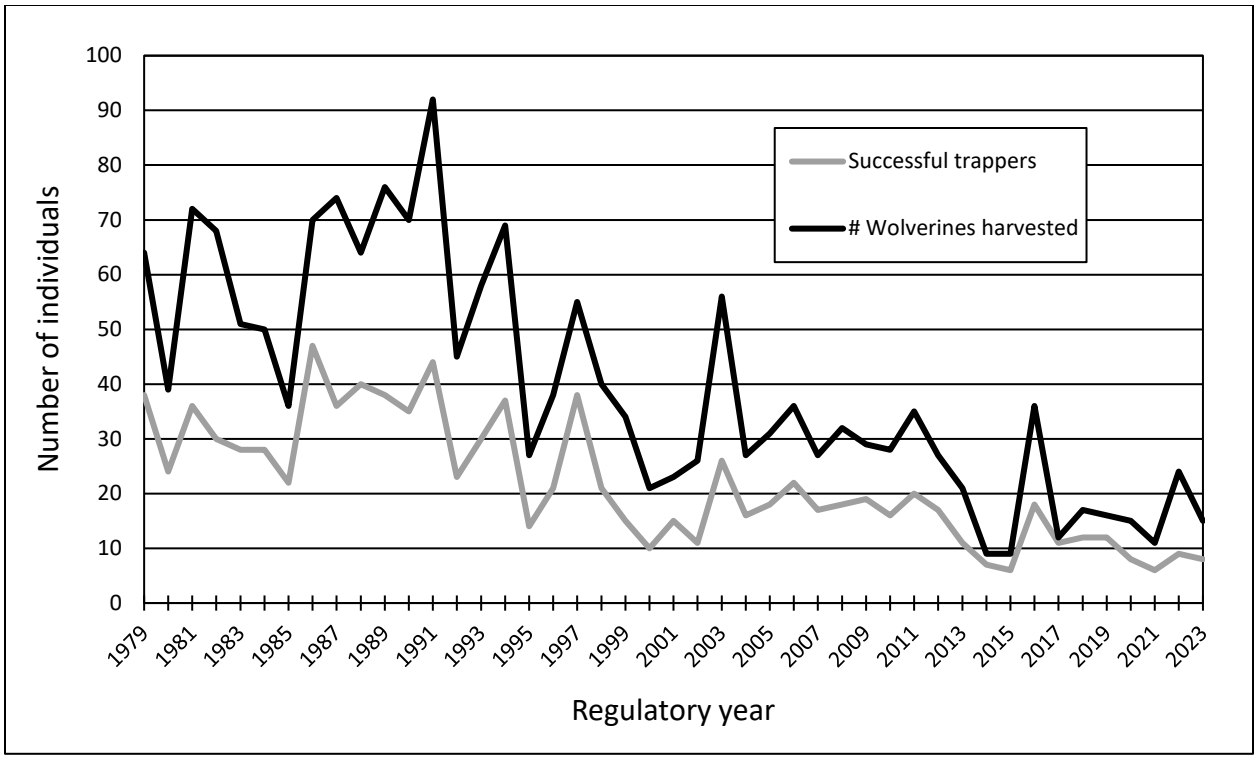

Figure 22-1. Number of successful trappers and wolverines harvested in Unit 9, regulatory years 1979 through 2023.

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

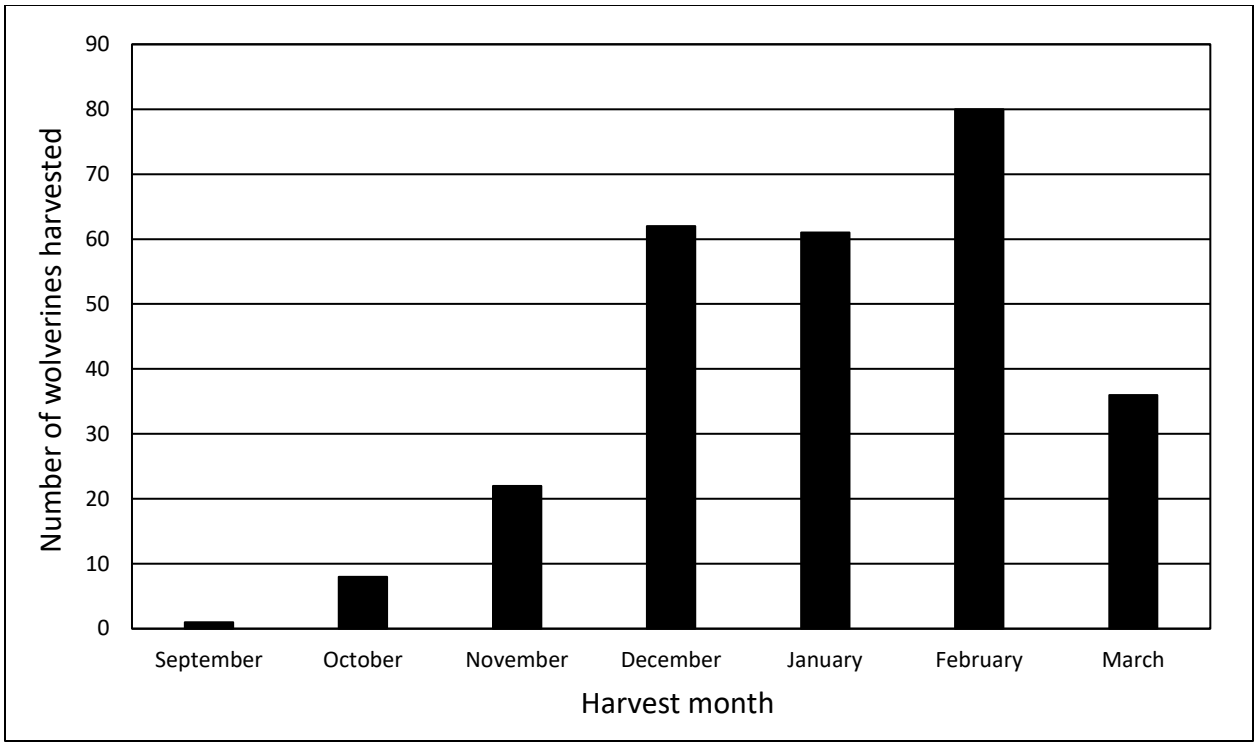

Figure 22-2. Total number of wolverines taken by month in Unit 9, regulatory years 2010 through 2023.

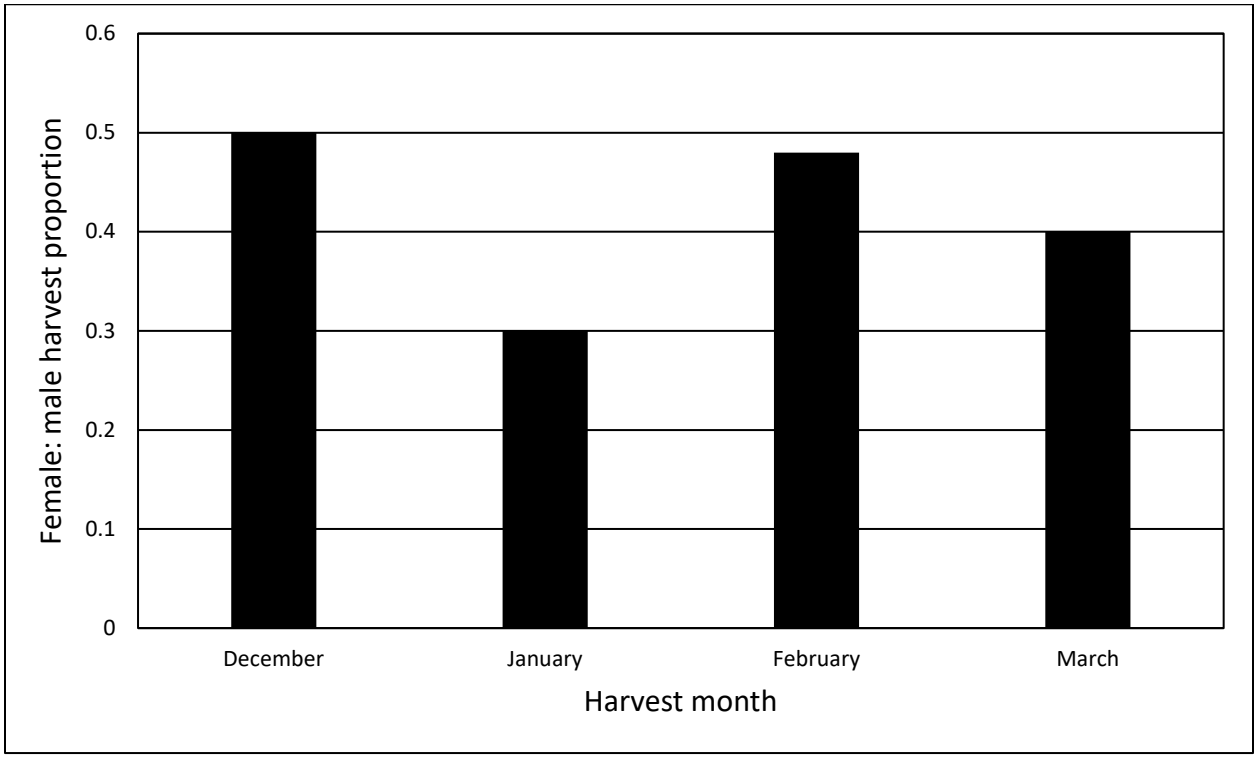

Figure 22-3. Ratio of female to male wolverines harvested in Unit 9, regulatory years 2010 through 2023.

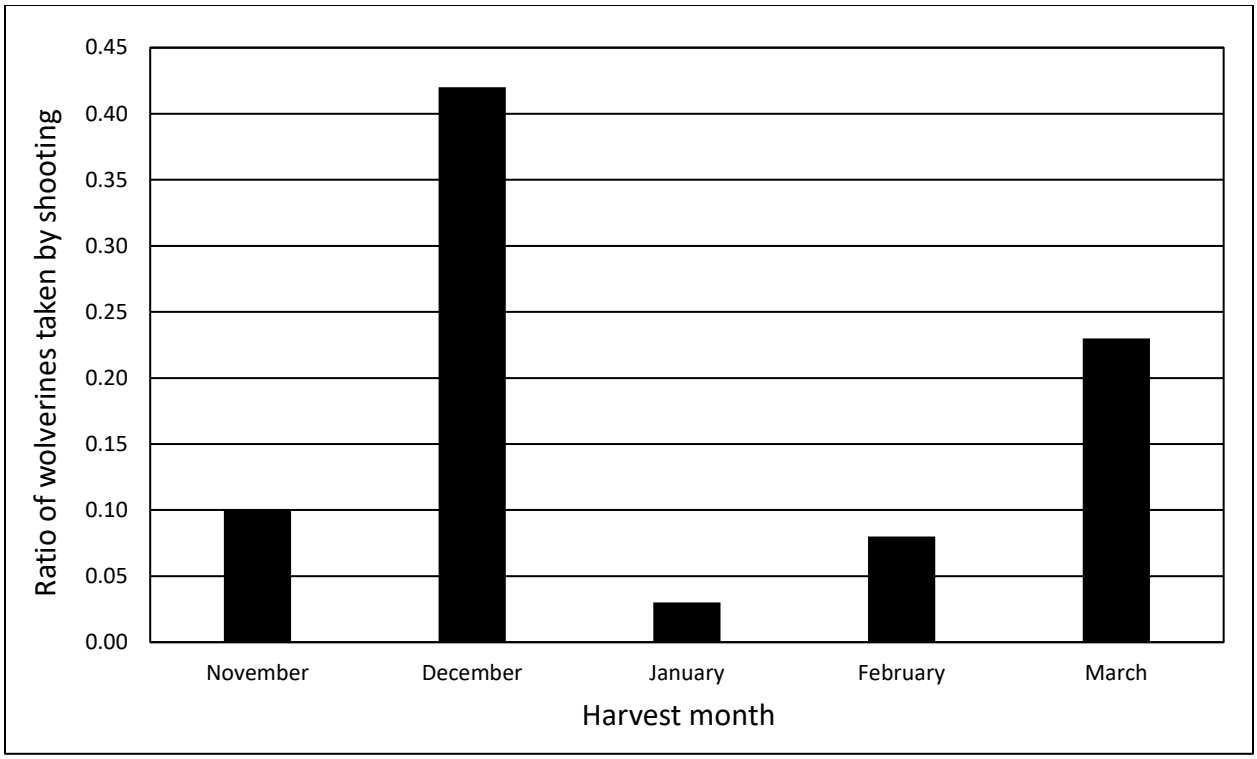

Figure 22-4. Ratio of wolverines harvested by shooting to total monthly harvest in Unit 9, regulatory years 2010 through 2023.

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

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

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

PROPOSED BY: Jeff Wasley

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

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

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

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

Units and Bag Limits (G) Emperor geese	**Resident Open Season** (General Hunt Only)	**Nonresident Open Season**
…		
Units 8 and 10		
RESIDENTS:		
1 goose by registration permit only	Oct 8 – Jan 22	
NONRESIDENTS:		
1 goose by drawing permit only; up to 25 permits may be issued in combination with Unit 9		Oct 8 – Jan 22
Unit 9, that portion within the Izembek State Game Refuge		
RESIDENTS:		

1 goose by registration permit only	Oct 16 – Oct 31

NONRESIDENTS:

1 goose by drawing permit only; up to 25 permits may be issued in combination with Units 8, the remainder of Unit 9, and 10	Oct 16 – Oct 31

Unit 9, remainder

RESIDENTS:

1 goose by registration permit only	Sept. 1 – Dec. 16

NONRESIDENT HUNTERS:

1 goose by drawing permit only; up to 25 permits may be issued in combination with Units 8, that portion of Unit 9 within the Izembek State Game Refuge, and 10	Sept. 1 – Dec. 16

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

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

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

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

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

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

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

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

Table 23-1. Emperor goose permit hunt 2017 – 2023 (with current 500 bird quota allocation)

Hunt areas - quota	Avg Permits Issued	Avg No. Hunted	Avg No. Harvested R: NR
Unit 8 – 150 birds	206	84	41: 2
Unit 9/17 – 100	102	72	54: 15
Izembek SGR - 50	32	12	8: 1
Unit 10 – 125	80	49	32: 4
Unit 18 – 25	20	3	1
Unit 22 – 25	12	4	1
Unit 23 – 25	6	1	0

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

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

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

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Proposal 24

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

PROPOSED BY: Gabe Davis

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

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

Units and Bag Limits	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
…		
Unit 17(A) Up to 2 moose per regulatory year,		
only as follows:		
RESIDENT HUNTERS: 1 moose by registration permit only or;	Aug. 25 – Sept. 25. (Subsistence hunt only)	
1 antlered bull by registration permit only or;	Jan. 1 – Last day of Feb. (Subsistence hunt only)	
1 antlerless moose by registration permit only	Jan. 1 – Last day of Feb. (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 50 permits may be issued.		Sept. 5 – Sept. 15
…		

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

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

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

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

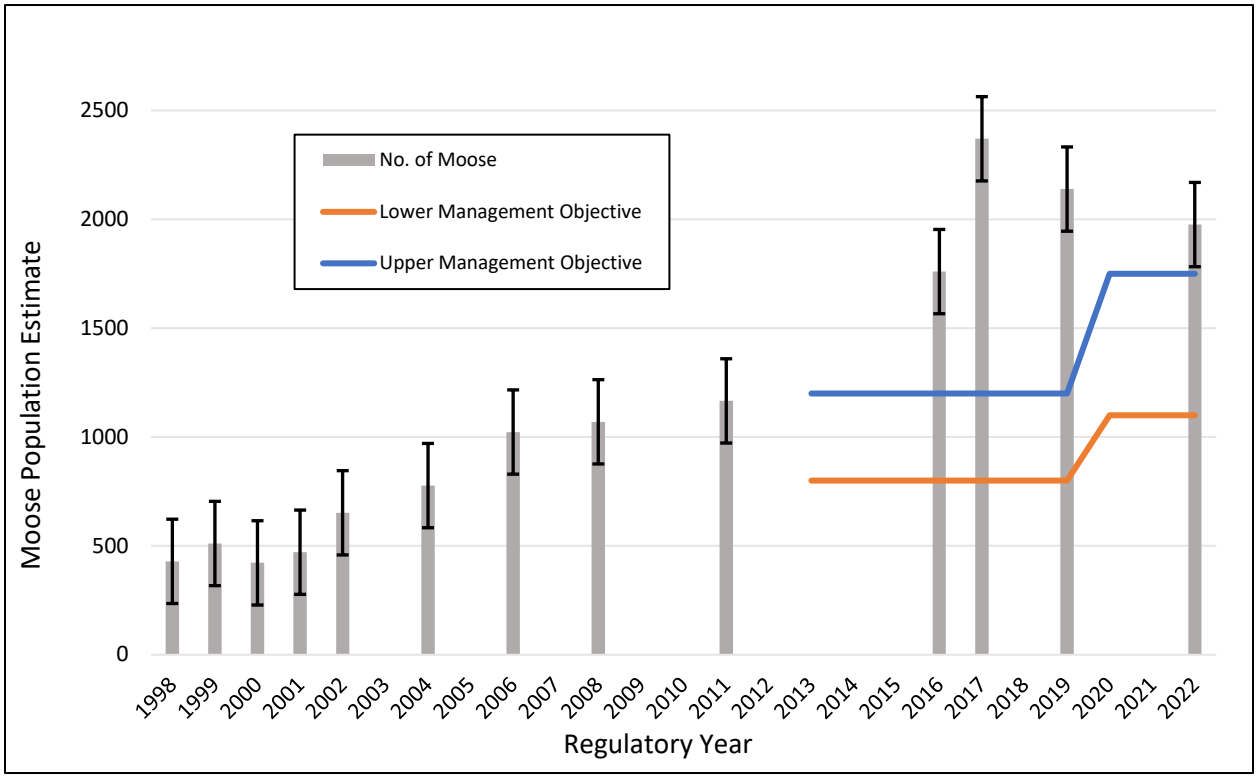

Figure 25-1. Unit 17A moose population estimates from RY98–22 corrected for sightability. Estimates from RY16, RY19, and RY22 population surveys occurred in the fall without snow cover.

Since DM570 became available, moose harvest by nonresidents has stayed relatively steady with a high of 10 moose harvested in RY16, a low of 3 moose in RY22, and a 10-year average of 5 moose harvested (Figure 25-2). Twenty permits have been available since RY14 except for RY21

when 30 permits were available for drawing. The increased number of permits awarded in RY21 was not supported by local residents of Togiak as communicated through the Togiak advisory committee. Participation is generally high for those who draw permits ranging from 40%–90% with an average of 62% annually of permit holders who chose to hunt (n=12).

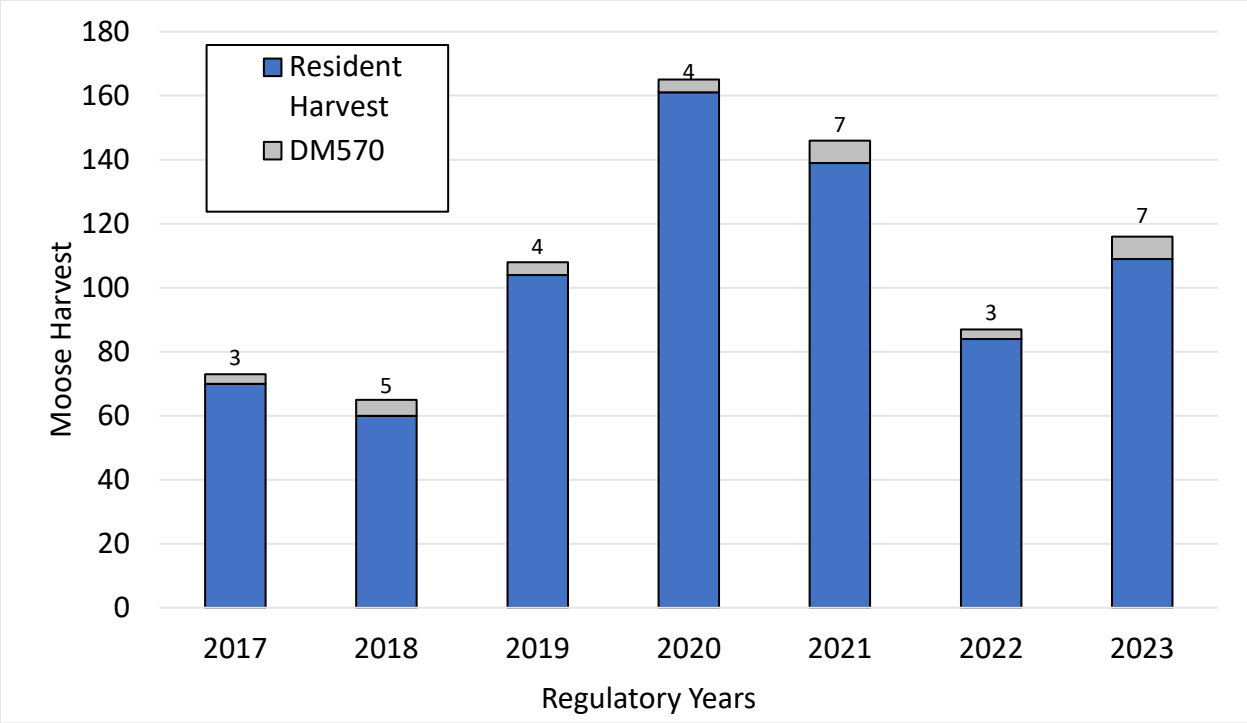

Figure 25-2. Unit 17 Nonresident hunter participation in DM570, RY2014–23.

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

regulation effectively reduces competition between local residents and nonlocal residents and nonresidents but also limits the level of harvest needed to slow the trajectory of this growing population.

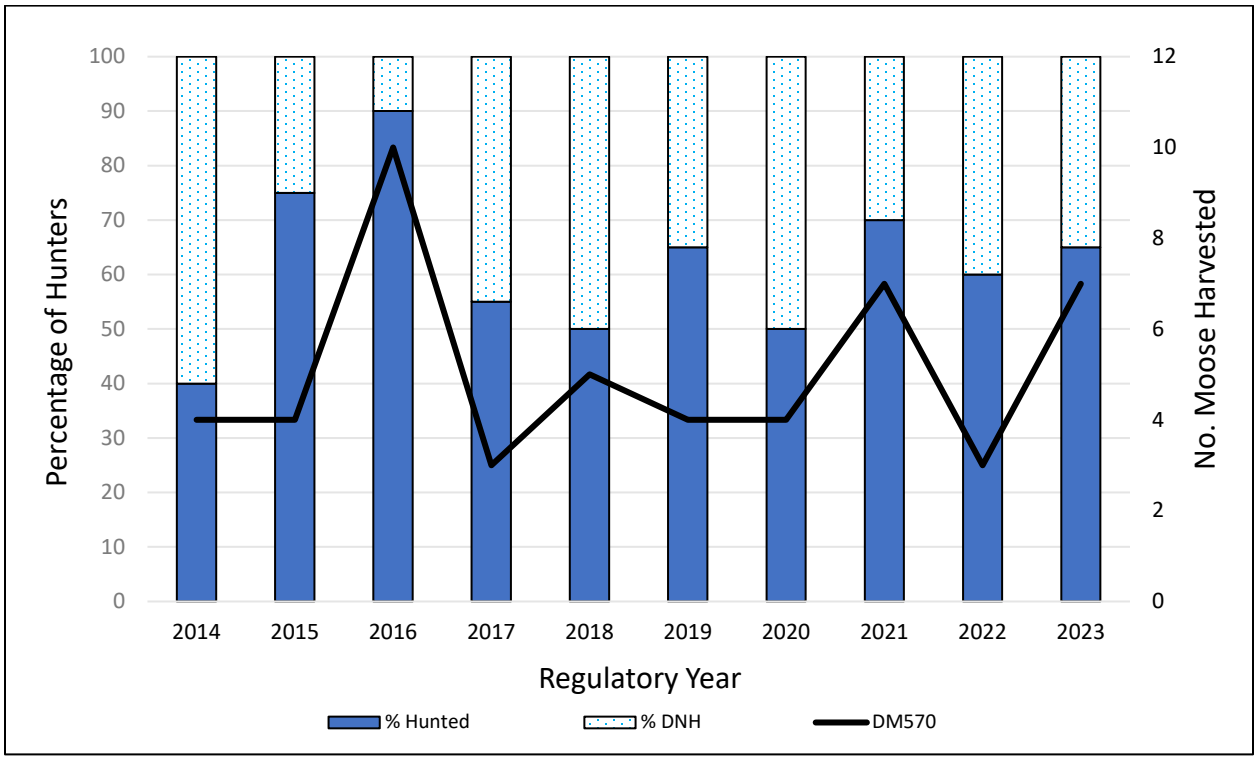

Figure 25-3. Nonresident hunter participation and harvest under permit DM570 from regulatory years RY2014–2023.

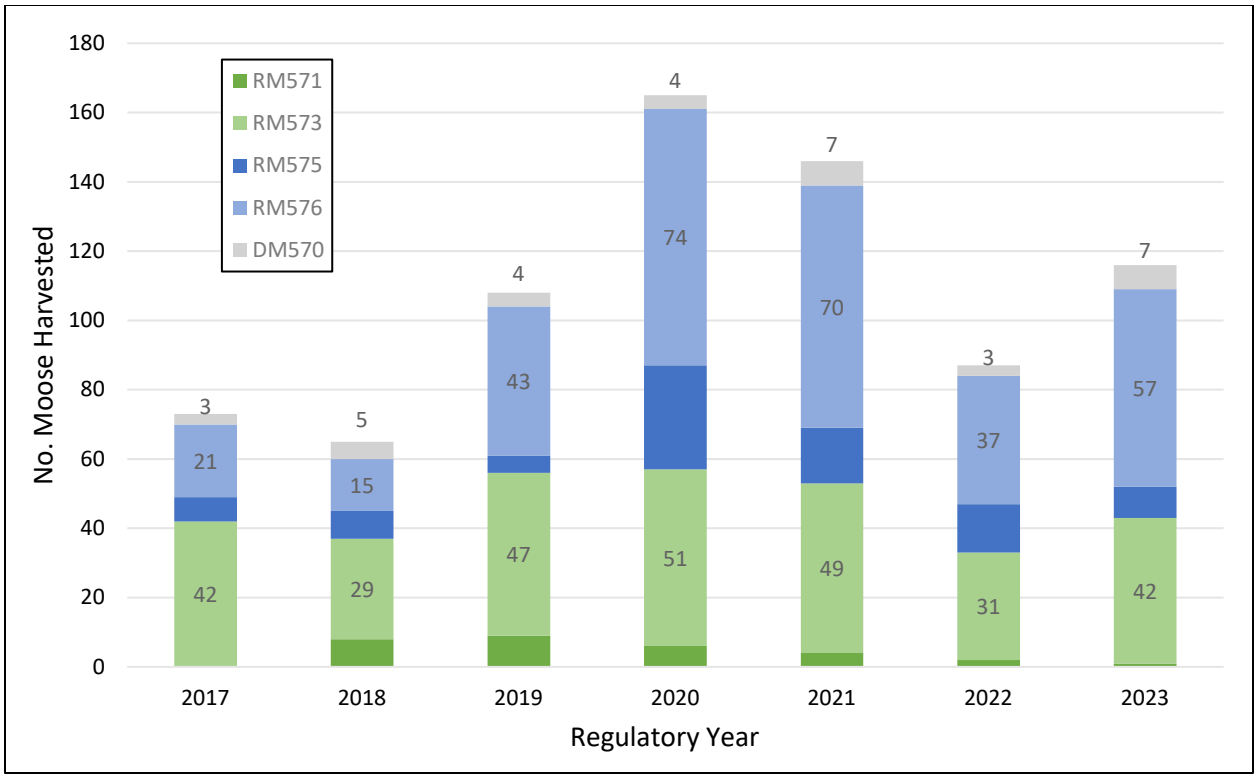

Figure 25-4. All reported moose harvest in Unit 17A by permit, RY2017–2023.

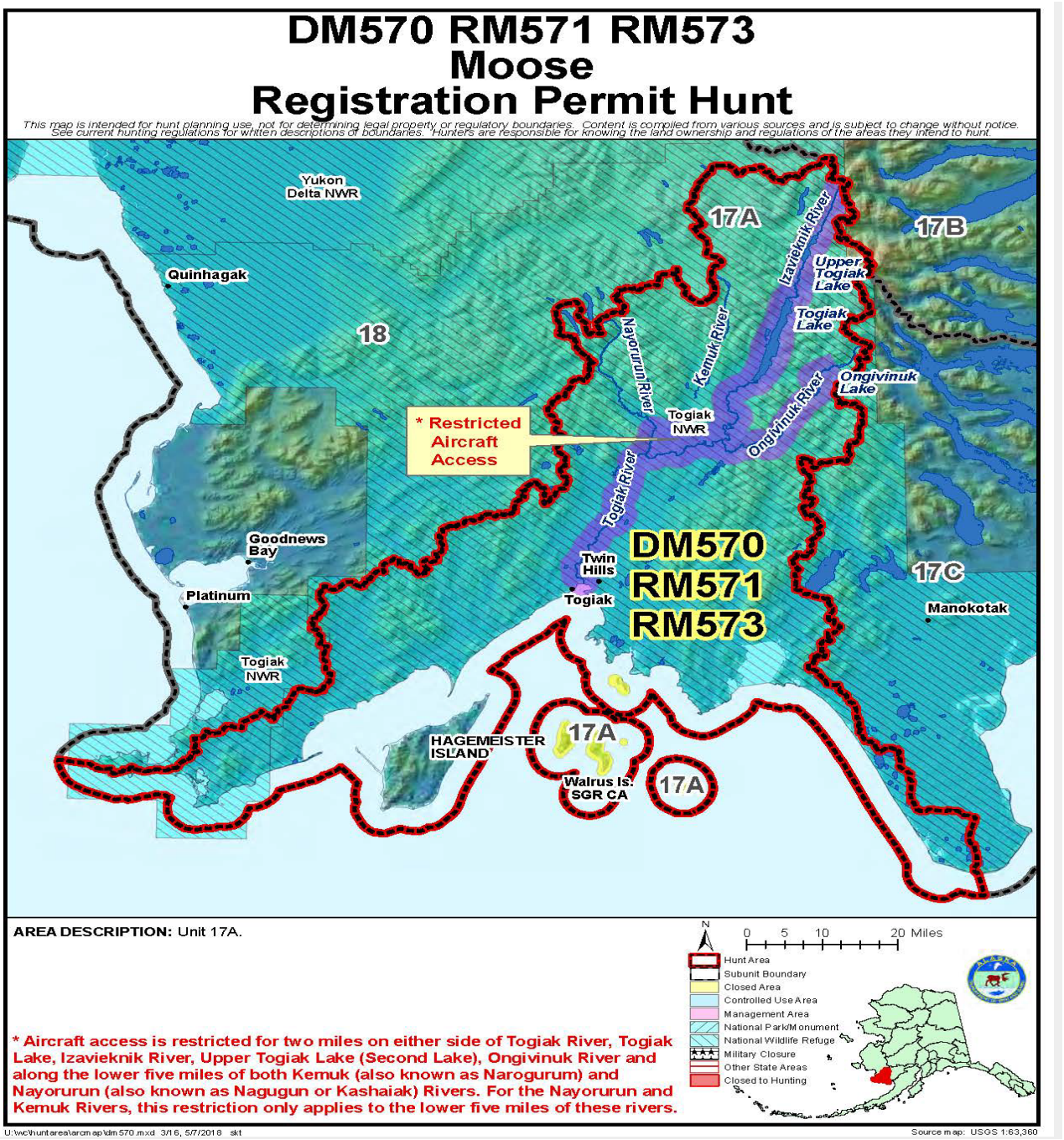

Figure 25-5. Unit 17A aircraft restriction corridor along the mainstem of the Togiak river and lake, the Ongivinuk, Izavieknik, and lower 5 miles of the Nuyorurun and Narogurum Rivers.

Similar proposals have come before the board previously. In 2022, the board rejected a similar proposal due to lack of local support, perceived competition between nonresidents and resident hunters, and the lack of enough access points outside of the aircraft restriction corridor. Since the inception of DM570, there have been roughly 15–17 locations reported as access points outside of the aircraft restriction corridor; more do exist but are not being utilized by any area transporter, thus effectively reducing the number of nonresident hunters that are able to access and hunt Unit

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

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

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

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

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

PROPOSED BY: Gabe Davis

WHAT WOULD THE PROPOSAL DO? The proposal would lengthen the nonresident moose hunting season by 10 days total, 5 days at the beginning and 5 days at the end, from September 5 - 15, to September 1 t- 20.

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

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

only as follows:

RESIDENT HUNTERS:

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

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 50 permits may be issued	Sept. 5 – Sept. 15

….

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

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

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

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

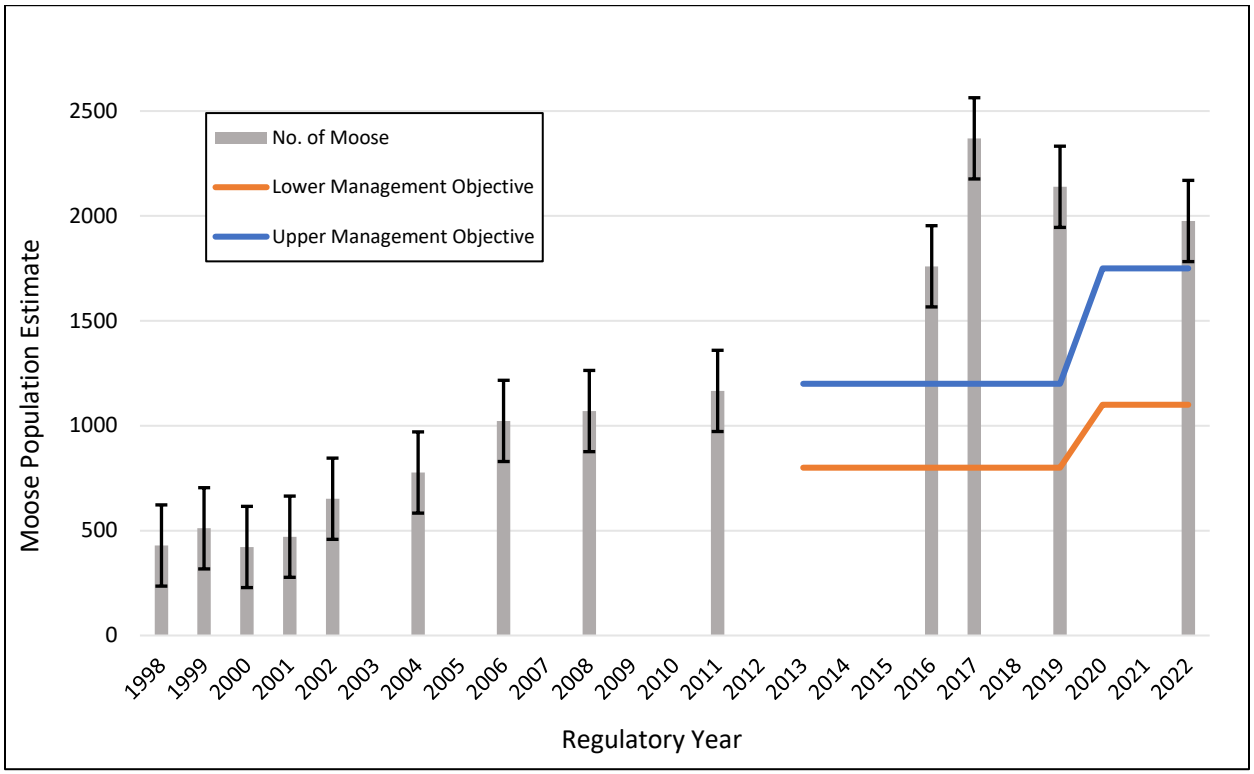

Figure 26-1. Unit 17A moose population estimates from RY98-22 corrected for sightability. Estimates from RY16, RY19, and RY22 population surveys occurred in the fall without snow cover.

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

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

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

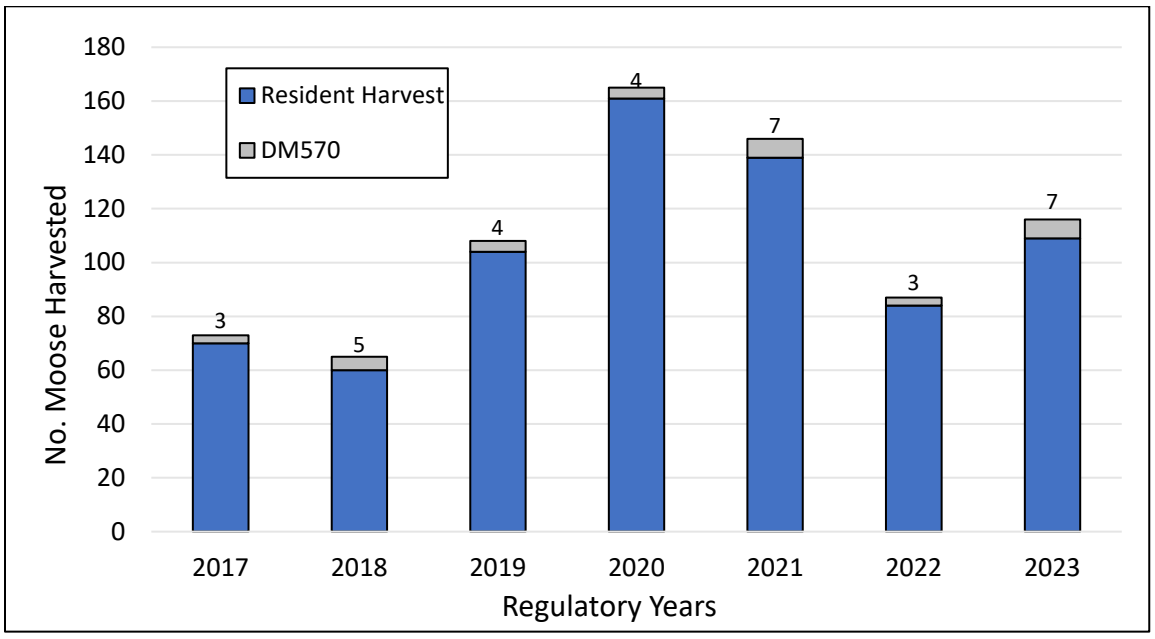

Figure 26-2. Resident and nonresident moose harvest in Unit 17A, regulatory years 2017–2023.

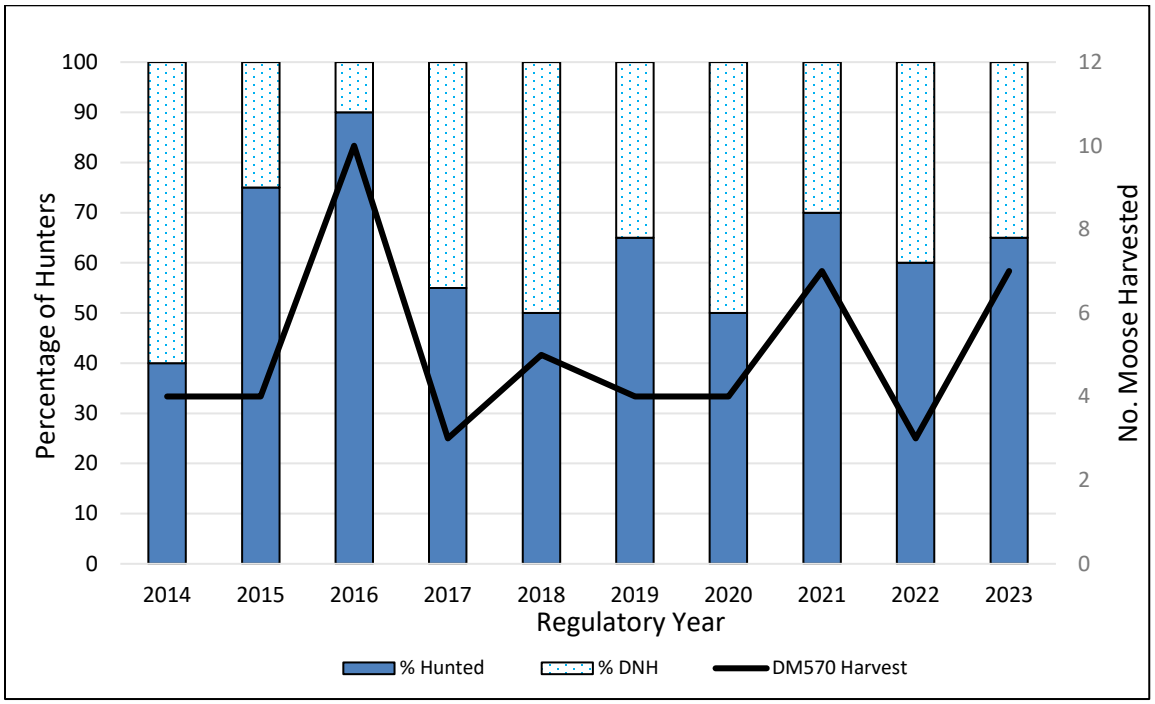

Figure 26-3. Percentage of nonresident hunter participation and those that did not hunt (DNH), and total number of moose harvested under DM570 from regulatory years 2014–2023.

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

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

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PROPOSAL 27 - 5 AAC 85.045(15). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 17A.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose seasons for Unit 17A.

WHAT ARE THE CURRENT REGULATIONS? The current regulations for the Unit 17A antlerless moose hunt allow resident hunters a bag limit of two moose per regulatory year under registration permits, however only 1 moose can be taken during the fall season. Nonresidents are restricted to a bag limit of one bull moose with antler restrictions by drawing permit.

- There are three fall hunts, one of which allows the harvest of an antlerless moose:
    - Registration permit (RM573), for resident hunters only with a bag limit of one bull moose, August 25–September 25;
    - Registration permit (RM571), for resident hunters only with a bag limit of one antlerless moose, August 25–September 25;
    - Drawing permit (DM570 - up to 20 permits are available), for non-resident hunters only, with a bag limit of one bull moose with 50” antlers or antlers with 4 or more brow tines on at least one side, September 5–15.
- There are two winter hunts, open to resident hunters only, one of which allows for the harvest of antlerless moose.
    - Registration permit (RM575), for resident hunters only with a bag limit of one antlered bull moose, January 1– Last day in February;
    - Registration permit (RM576), for resident hunters only with a bag limit of one antlerless moose, January 1– Last day in February.

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

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

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would reauthorize the antlerless moose hunts in Unit 17A. These antlerless hunts would continue to provide hunters with additional harvest opportunity while helping managers by limiting the growth of the Unit 17A moose population that is already beyond the upper limit of the population objectives.

BACKGROUND: Moose are relative newcomers to Unit 17A, with only about 35 animals being present along the eastern border in 1980. Since then, moose have continued to increase in population size and expand throughout Unit 17A and west into Unit 18. Minimum counts of moose in Unit 17A were conducted in 14 different years during the period of 1991–2011, revealing a steady increase in moose numbers over time, with 1,166 moose counted in March 2011. During 2012–2015, surveys were not conducted due to inadequate snow conditions. Beginning in fall 2016, a Geospatial Population Estimator (GSPE) replaced the minimum count for enumerating moose in Unit 17A. In spring 2017, this survey technique produced an estimate corrected for sightability (1.2) of 2,370 moose, (±563). The uncorrected estimate was 1,990 moose (±437). The most recent survey conducted in October of 2022 estimated a total of 2,440 (±251) with an uncorrected estimate of 1,719 moose (±144). The GSPE technique largely depends on adequate snow coverage, but due to the coastal climate of 17A these weather patterns are unreliable. To meet these challenges Togiak National Wildlife Refuge shifted towards fall surveys to increase the likelihood of completion, with the caveat that sightability is decreased due to lack of snow. While the range is overlapping this slight decrease in point estimates (1,990 vs 1,719) is likely due to liberal winter seasons where cows are desired and available for harvest.

Moose management in Unit 17A has been guided by the Unit 17A Moose Management Group, consisting of members from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game advisory committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game. This group produced a Unit 17A Moose Management Plan that went through several iterations during 1996–2013, with the 2013 plan being used as the guiding document today. This plan has goals and objectives for hunter opportunity, harvest allocation, habitat mapping and population monitoring. The population objective for Unit 17A listed in the plan was originally 800-1,200 moose and was changed to 1,100–1,750 in 2020.

A drawing hunt for nonresident hunters was adopted by the board in 2013, with fall 2014 being the first year of that hunt. The impetus behind the nonresident hunt was abundant harvest opportunity provided by this growing moose population, and objectives within the moose management plan that provide for the nonresident opportunity when the moose population exceeds 1,000 animals and is at a stable or increasing trend.

The winter antlerless hunt was adopted by the board and initiated in RY13 that allows for an antlerless harvest when the moose population is above 600 animals and is stable or increasing. During the last seven years of the RM576 antlerless hunt (RY17–RY23), 314 antlerless moose have been taken (241 cows and 73 bulls), for an average of ~35 cows/winter.

Because of the concerns with the increasing moose numbers in Unit 17A that are already well above population objectives, a proposal was adopted by the board during their spring 2018 meeting in Dillingham, to open a fall antlerless hunt in fall 2018 to increase harvest on the female segment of the population. During the first year of this hunt in fall 2018, 8 antlerless moose were harvested, all were cows. From RY17–R23 a total of 30 cows have been harvested during the fall hunt, for an average of 5 cows/year.

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

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

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. The moose population in this unit is above the upper limit of the population objective. Allowing a small harvest of antlerless moose will help limit population growth while providing additional harvest opportunity for hunters.

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

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Proposal 28

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

PROPOSED BY: Patrick Walsh

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

WHAT ARE THE CURRENT REGULATIONS?

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

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

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

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

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

The first widespread population surveys began in 1974 and the population peaked in 1996 at an estimated 200,000 caribou; a low of 7,500 caribou was documented in 1978. The average number of MCH caribou prior to their peak in 1996 across eleven survey periods was 64,372. The post-peak average over 17 surveys from 1999 through 2024 averages 41,033. Both of these averages fall within the current population objective range (Table 29-1). In retrospect, the 2008 MCH population objective has been achieved in three of the last 19 survey years. The current midpoint of the population objective of 55,000 caribou has been achieved in 9 survey years out of 28 total estimates going back 46 years, but is heavily skewed lower due to annual surveys in recent years contributing to a decreased average.

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

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

Calendar Year	Minimum Count[a]	Extrapolated Estimate[b]
2006	40,766	45,000
2008	20,545	30,000
2012	15,443	22,809
2013	12.660	18,308
2014	-	26,275
2015	-	30,736
2016	14,780	27,242
2017	13,350	-
2018	11,084	-
2019	9,294	13,448
2020	8,782	13,448
2021	9,933	12,837
2022	9,710	12,112
2023	10,144	12,507
2024	12,816	14,498

[a] Data derived from photo-counts and observations during the aerial census.
[b] Estimate based on observations during census/surveys and subjective estimates of the number of caribou in areas not surveyed.

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

Currently the MCH is fragmented into at least 4 segments, possibly more. These various segments range in abundance estimates from a low of 650 in Unit 18 near Goodnews to a high of 7,000 in West-MCH (WMCH) range. There currently is an active predation control program focused on removing bears and wolves on the WMCH portion's calving grounds for the benefit of caribou calves. There is also a longstanding public same day airborne wolf control program which encompasses portions of Units 9B, 17B, 17C, 18 and 19B; however, public participation has been low for a number of reasons including poor snow conditions and the remoteness of the area. The control area was expanded in 2022 to include the primary wintering grounds of the East-MCH (EMCH) range, and the calving grounds of both EMCH and WMCH.

Given the current decline in the MCH, it is appropriate to assess both range quantity and quality while monitoring for signs of degradation. A high of 4,880 caribou were reported harvested during the peak of MCH and it may be difficult to manage MCH if the herd increases to and beyond 60,000 animals due to concerns with irruptive growth.

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

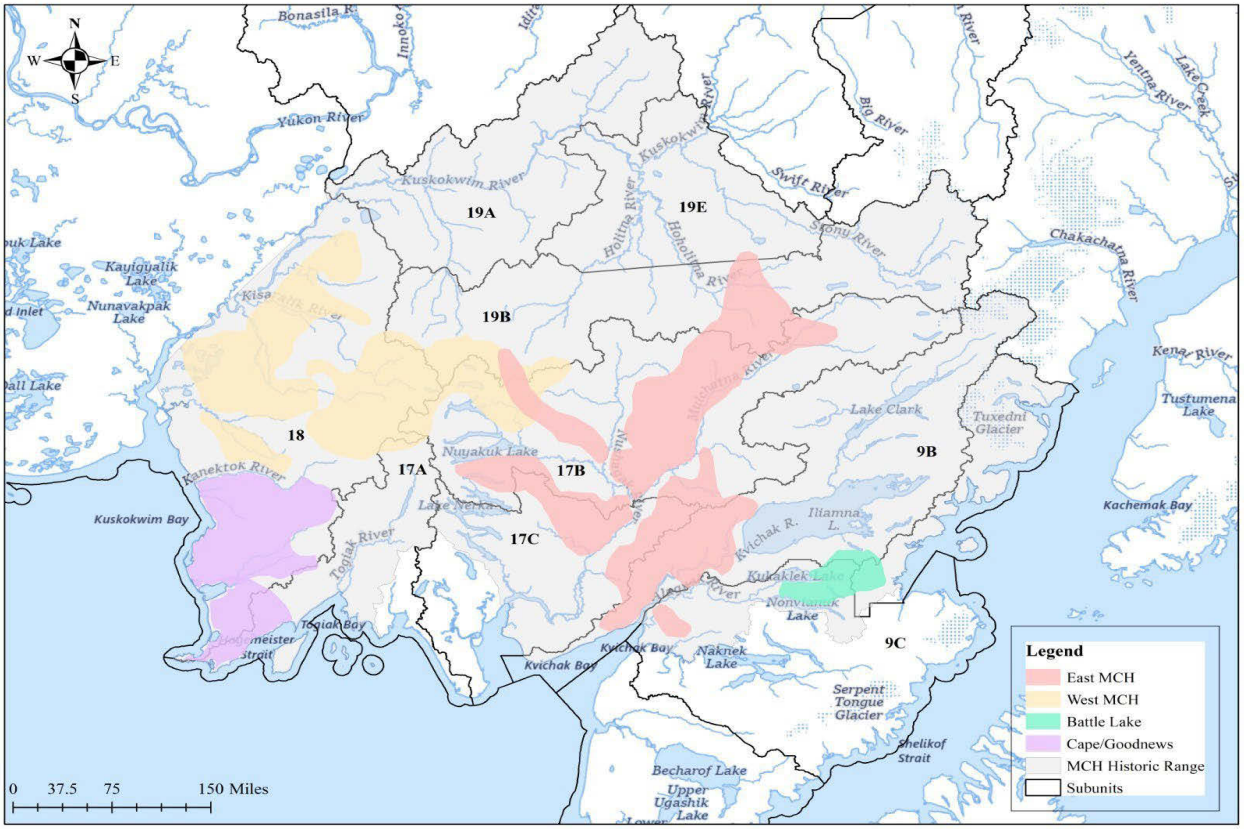

Figure 29-1. Historic and current range of the Mulchatna caribou herd across Units 9A, 9B, 9C, 17, 18 and 19A, and 19B.

Hunt structure should be discussed prior to the MCH population achieving 20,000 animals across the range. At this level it is advisable to offer limited bull harvest during the fall, and to manage for continued annual positive population growth to be documented in both the summer photo censuses and fall calf:cow ratios. Waiting until the population achieves its lower population objective of 30,000 to open a hunt is not recommended due to the potential for irruptive growth. Limited fall bull hunts and winter any caribou hunts may be warranted to help manage the population within the objective range.

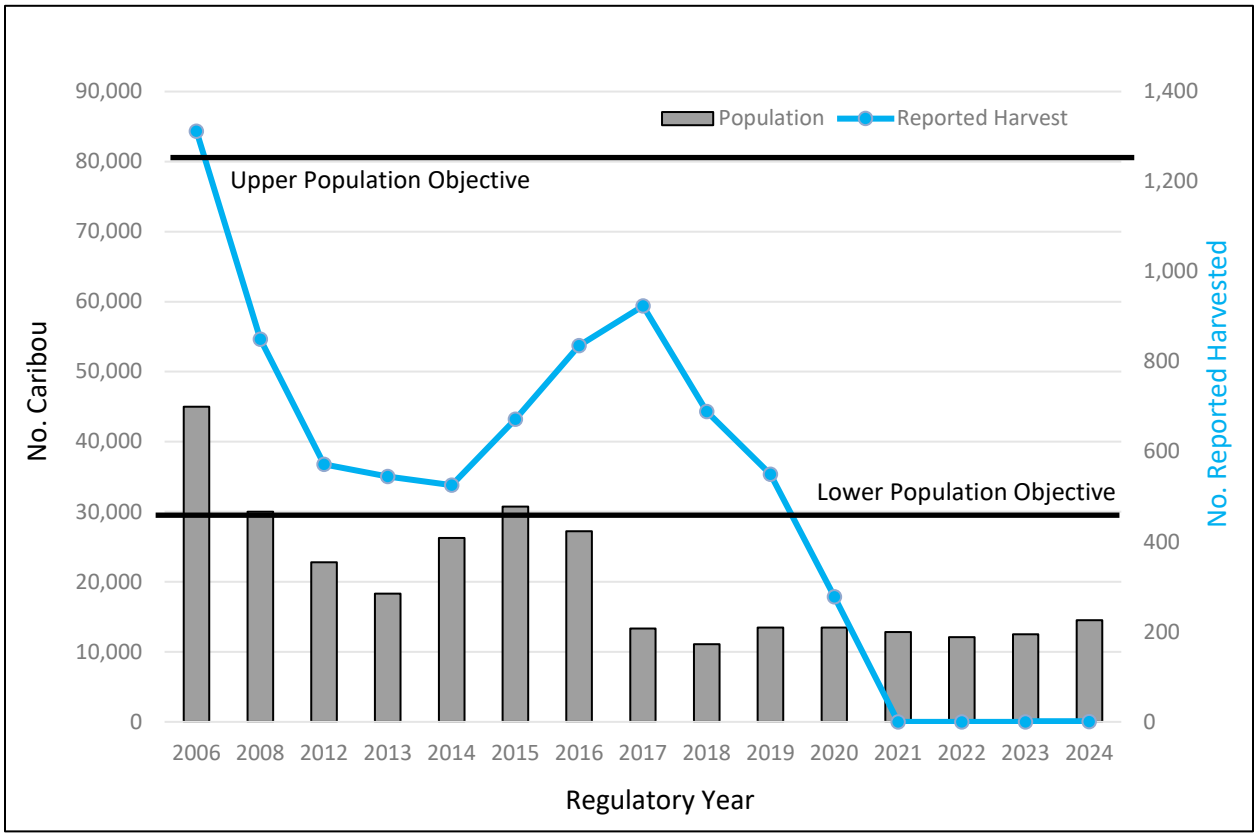

Figure 29-2. Mulchatna caribou herd population and harvest history, RY2014–2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. MCH populations have varied widely over the last century; the population is currently at half of the minimum objective across the range of MCH and the department believes the range can support at least 30,000 caribou. A number of factors contribute to the current low population level. Although the 2024 population estimate is the highest since regulatory year2017, it would be ideal to see the current positive growth rate continue. The department intends to continue intensive monitoring of the MCH for the foreseeable future. Department led bear removal efforts have likely contributed to bolstered calf survival in the WMCH as documented in the highest fall calf:cow composition surveys since their inception. Current community conservation efforts are applauded as minimal out of season take has been documented in recent years (2023 and 2024). The department recommends no changes to current objectives until predator control operations are concluded and enough time has elapsed to both determine program success and to detect continued positive herd growth.

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

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

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

PROPOSED BY: Alissa Nadine Rogers

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

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

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

RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Remainder of **Unit 17(B),** And that portion of **Unit 17(C)** east of the east Banks of the Wood River, Lake Aleknagik, Agulowak River, Lake Nerka, and the Agulupak River		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Units **19(A), 19(B),** and 19(E) within the Nonresident Closed Area		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 15	
NONRESIDENT HUNTERS:		No open season
Remainder of Units **19(A), 19(B)**, and 19(E)		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 15	
NONRESIDENT HUNTERS:		No open season

….

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

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

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

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

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

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

The population registered a low of 7,500 animals in 1974 and peaked at an estimated 200,000 caribou in 1996. The average of survey estimates from 1974-1996 was 58,512 animals but weighted heavily by the peak years in the late 1990s. Since the updated intensive management objectives established in 2008, the MCH population lower objective has only been achieved twice, in 2008 and 2015. The current midpoint of the objective of 55,000 caribou has been achieved 9 survey years out of 24 total estimates going back 46 years, with the most recent mid-point objective being met in 2004. The MCH remains under the population objective with consistent estimates from 2019 through 2023 of 12,000–13,000 caribou with overlapping confidence intervals, suggesting that the last five years have remained relatively stable, and slight growth observed in 2024 (~14,500) (Tables 30-1, Figure 30-2).

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

Calendar Year	Minimum Count[a]	Extrapolated Estimate[b]
2006	40,766	45,000
2008	20,545	30,000
2012	15,443	22,809
2013	12.660	18,308
2014	-	26,275
2015	-	30,736
2016	14,780	27,242
2017	13,350	-
2018	11,084	-
2019	9,294	13,448
2020	8,782	13,448
2021	9,933	12,837
2022	9,710	12,112
2023	10,144	12,507
2024	12,816	14,498

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

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

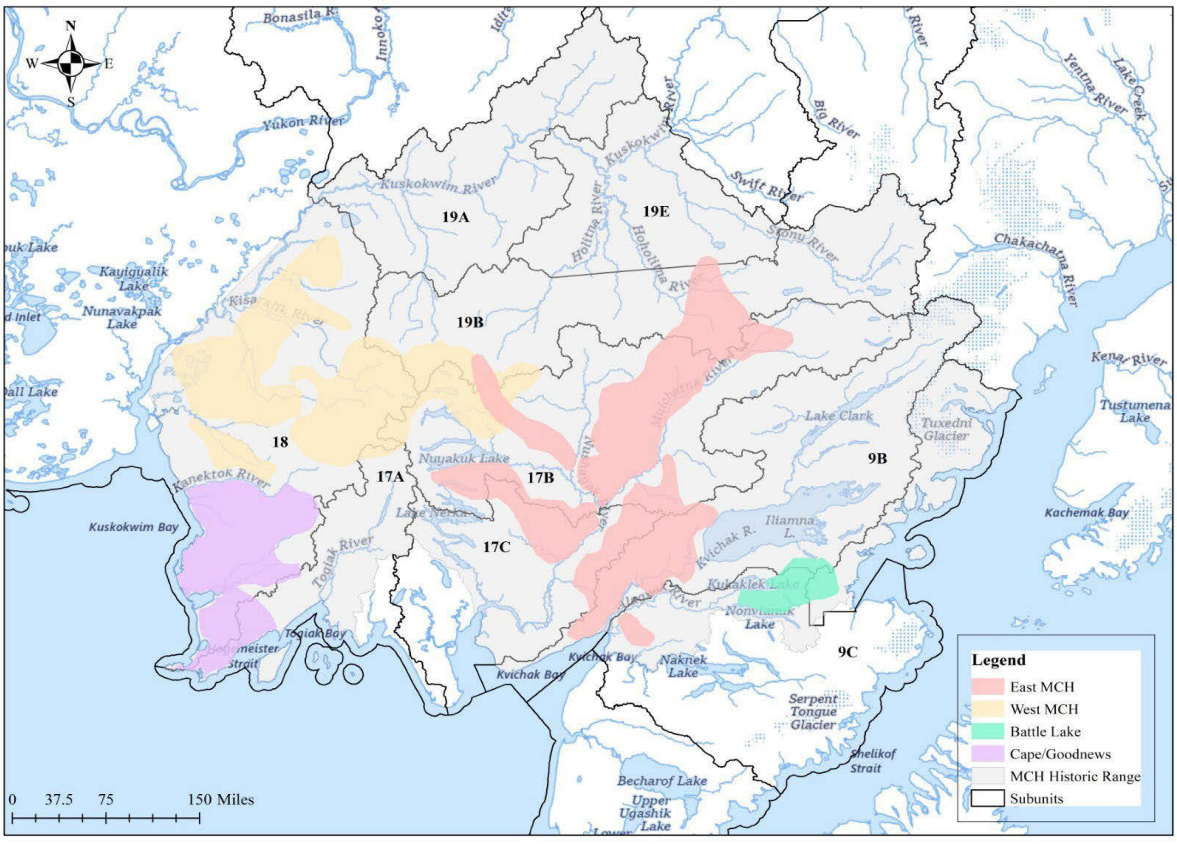

Figure 30-1. Historic and current range of the Mulchatna caribou herd across Units 9A, 9B, 9C, 17, 18 and 19A&B.

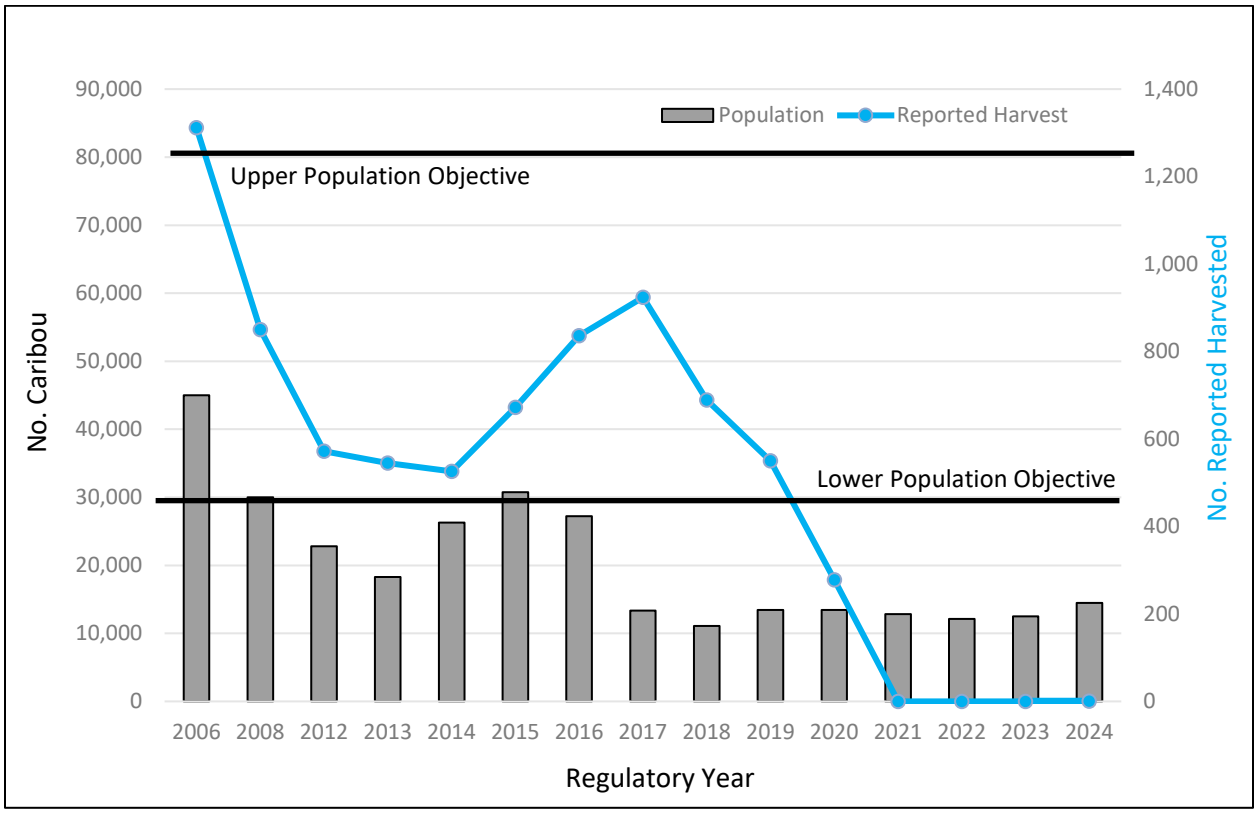

Figure 30-2. Mulchatna caribou herd population and harvest history, RY06–24.

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

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

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

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

PROPOSED BY: Alissa Nadine Rogers

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

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

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

Banks of the Wood River, Lake Aleknagik, Agulowak River, Lake Nerka, and the Agulupak River		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 31	
NONRESIDENT HUNTERS:		No open season
Units 19(A), 19(B), and 19(E) within the Nonresident Closed Area		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 15	
NONRESIDENT HUNTERS:		No open season
Remainder of Units 19(A), 19(B), and 19(E)		
RESIDENT HUNTERS: 2 caribou by registration Permit only	Aug 1. – Mar. 15	
NONRESIDENT HUNTERS:		No open season

….

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

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

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

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

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

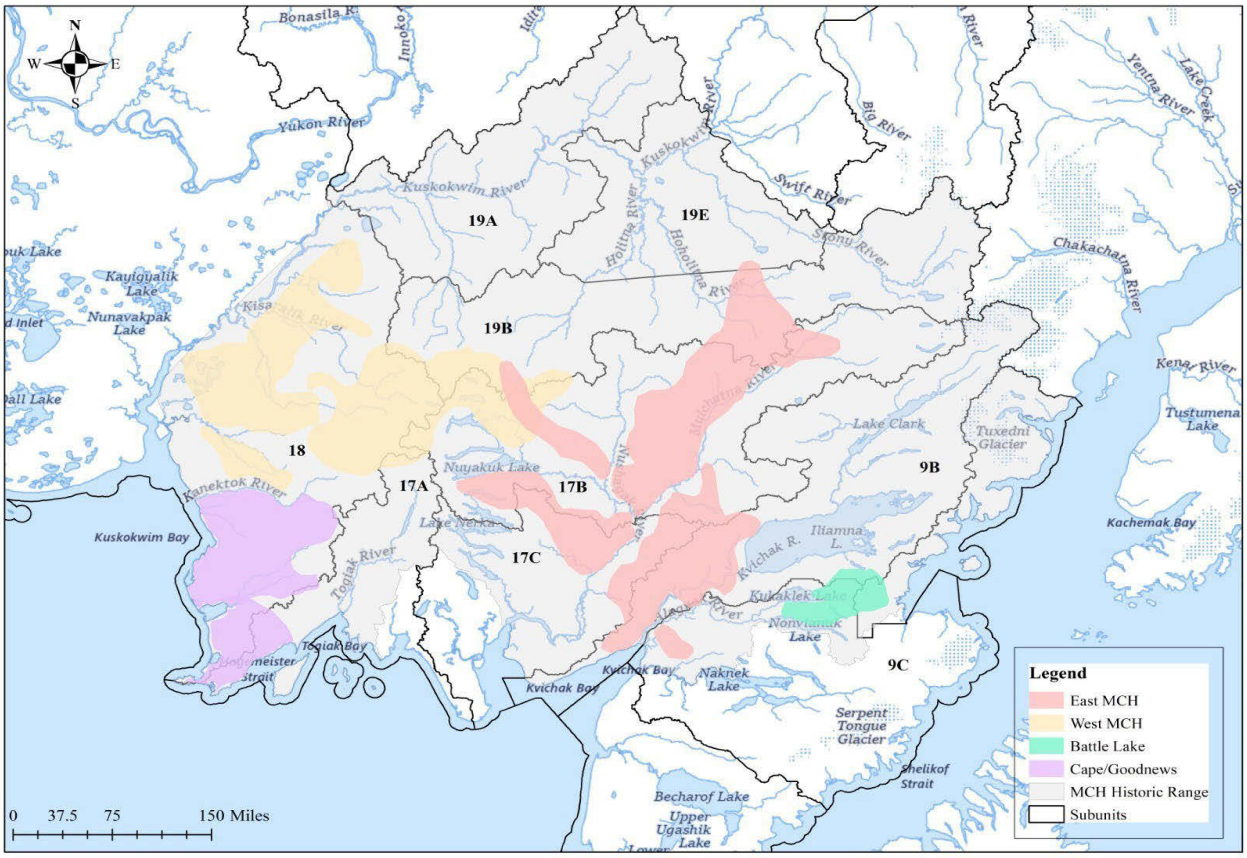

Figure 31-1. Historic and current range of the Mulchatna caribou herd across Units 9A, 9B, 9C, 17, 18 and 19A&B.

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

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

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

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

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

[a] Data derived from photo-counts and observations during the aerial census.
[b] Estimate based on observations during census/surveys and subjective estimates of the number of caribou in areas not surveyed.

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

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

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

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

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

PROPOSED BY: Dan Dunaway

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

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

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

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

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

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

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

BACKGROUND: Brown bears are found throughout Unit 17, from the coastal waters of Bristol Bay, the riparian areas of the Wood-Tikchik Mountains, to the Nushagak and Mulchatna rivers. A brown bear abundance survey was conducted in 2003 and 2004 by United States Fish and Wildlife Service using aerial survey transects in an 8,281 mi^2 area in Togiak National Wildlife Refuge primarily in Unit 17A, portions of 17C and 18, yielding an estimated 103 bears per 1,000 mi^2. Units 17B and 17C are more productive than 17A with more moose, caribou, and salmon as food resources for brown bears, and thus it is plausible they support similar densities to 17A. From RY11–23 the average number of hunters who took two bears was 5 hunters per year (range 0–13) which comprised of 0–9% of the annual harvest.

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

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

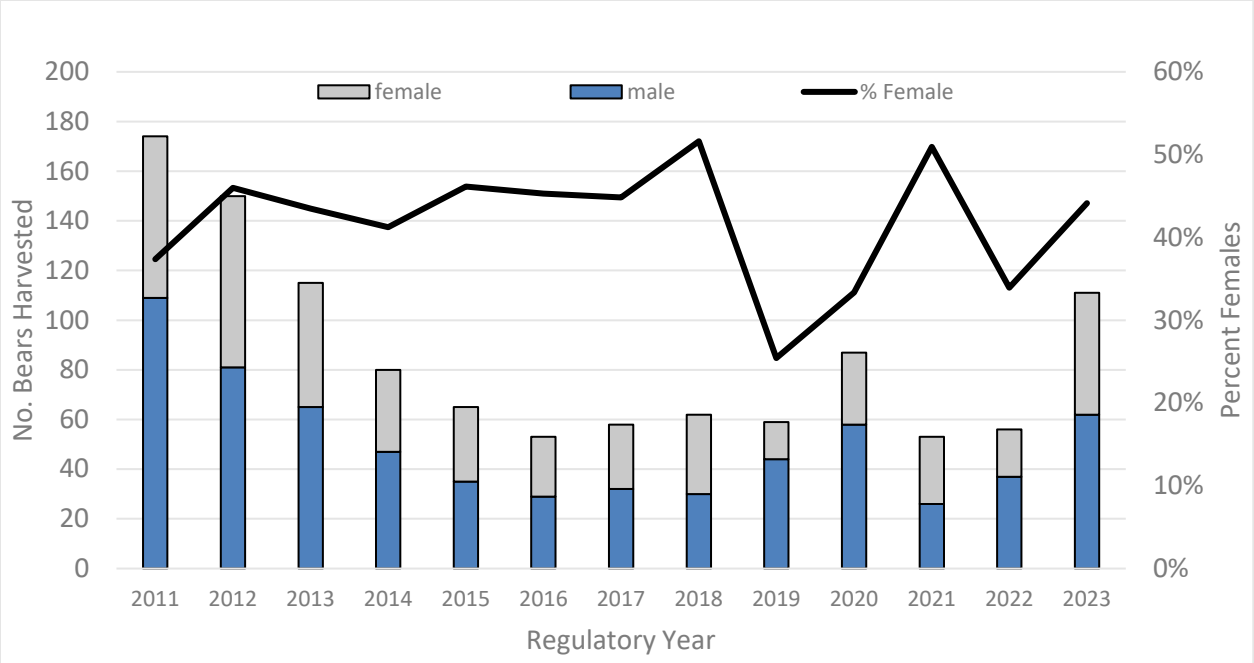

Figure 32-1. Brown bear harvest by sex in Unit 17 during regulatory years 2011 – 2023.

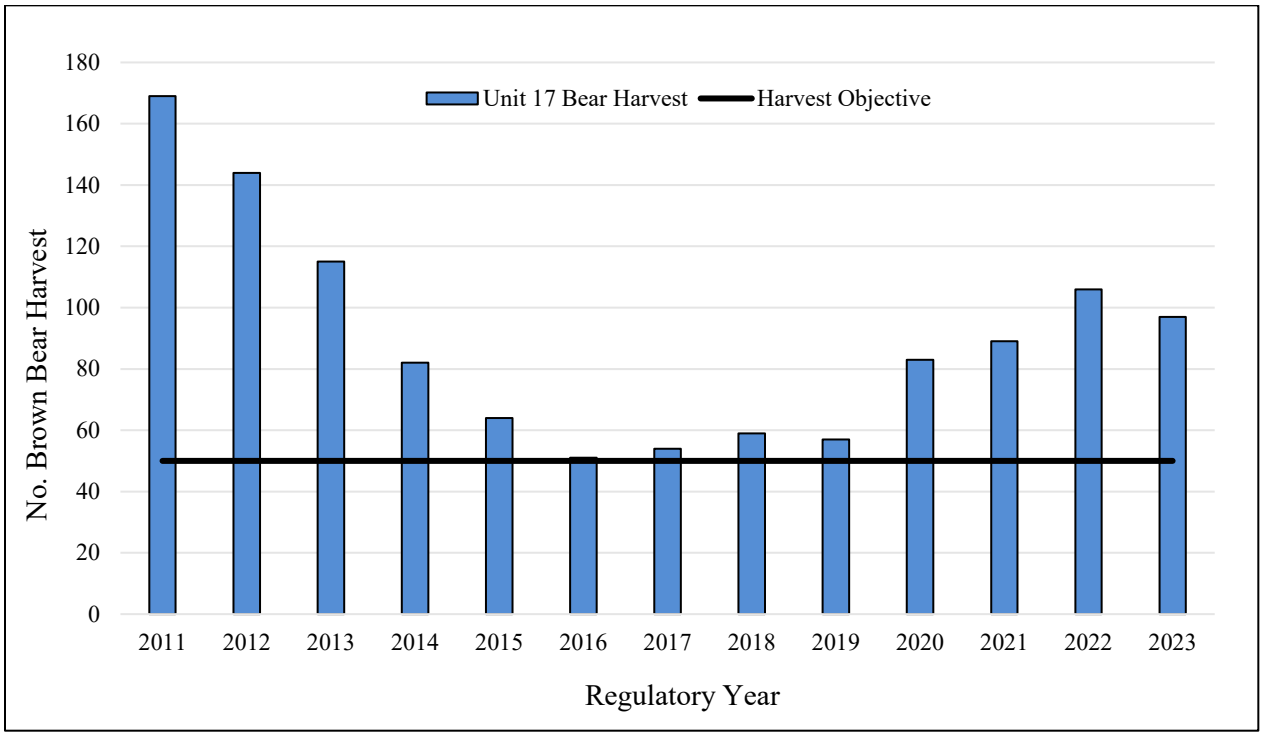

Figure 32-2. Brown Bear harvest in Unit 17 regulatory years 2011–2023. Does not include department removal in 2023.

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

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

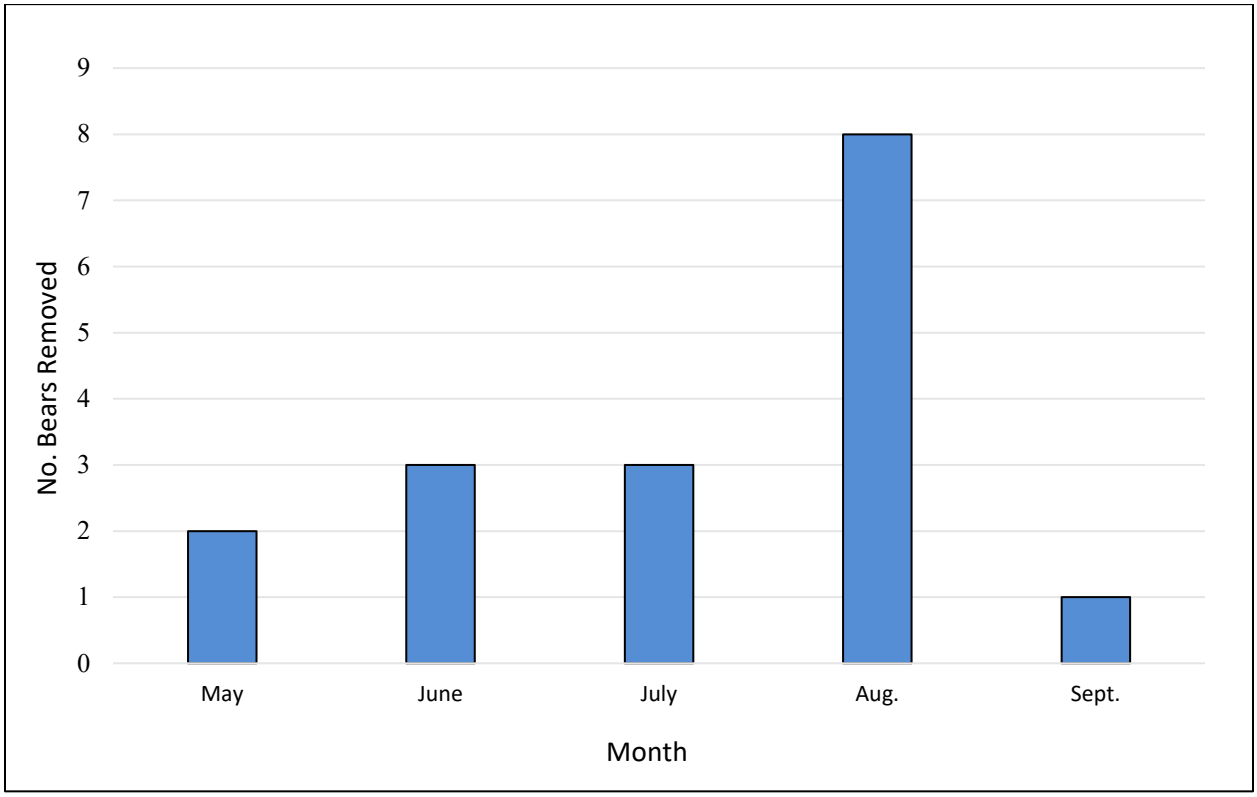

Figure 32-3. Chronology of brown bears removed through defense of life and property in Unit 17, regulatory years 2011–2023.

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

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

****

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

PROPOSED BY: Dennis Williams

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

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

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

….

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

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

….

Sec. 16.05.783. Same day airborne hunting. (a) a person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne. However, the Board

of Game may authorize a predator control program that allows airborne or same day airborne shooting…

5 AAC 92.039. Permit for taking wolves using aircraft. (a) a person may not use an aircraft to land and shoot a wolf without first obtaining a permit from the department. (b) a person may not use an aircraft to take a wolf by aerial shooting without first obtaining a permit from the department. (c) a person may not use a helicopter for helicopter trapping of wolves without first obtaining a permit from the department. …

- **5 AAC 92.085. Unlawful methods of taking big game. …** (8) a person who has been airborne may not use a firearm to take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. on the day following the day in which the flying occurred, …
  ….

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

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

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

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

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

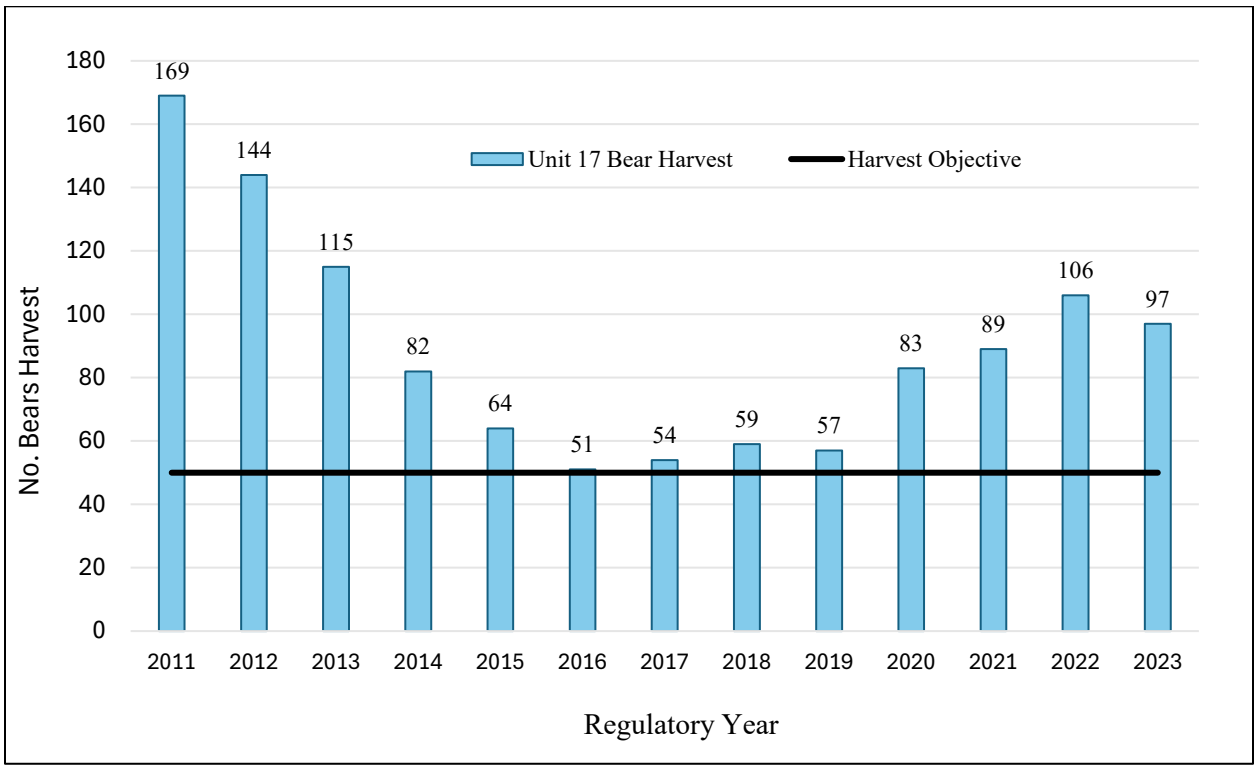

Figure 33-1. Total brown bear harvest in Unit 17 and minimum harvest objective, RY 2011–2023.

In 2003 and 2004, Togiak National Wildlife Refuge conducted dual observer line transect surveys for bears in Unit 17A and southwestern Unit 18 and documented a brown bear population estimate of 103 bears per 1,000 mi^2 across 8,281 mi^2 (Walsh *et al.* 2010). Prior to that, in 1993 through 1997, the department attempted to describe bear densities in the Killbuck mountains east of Bethel and northwest of Dillingham but were unable to critically assess densities due to political factors that prevented further bear capture and monitoring efforts. Fifty-two independent bears were detected throughout the study area resulting in a minimum density estimate of 55 bears per 1,000 mi^2 but managers suspected densities at least twice this size.

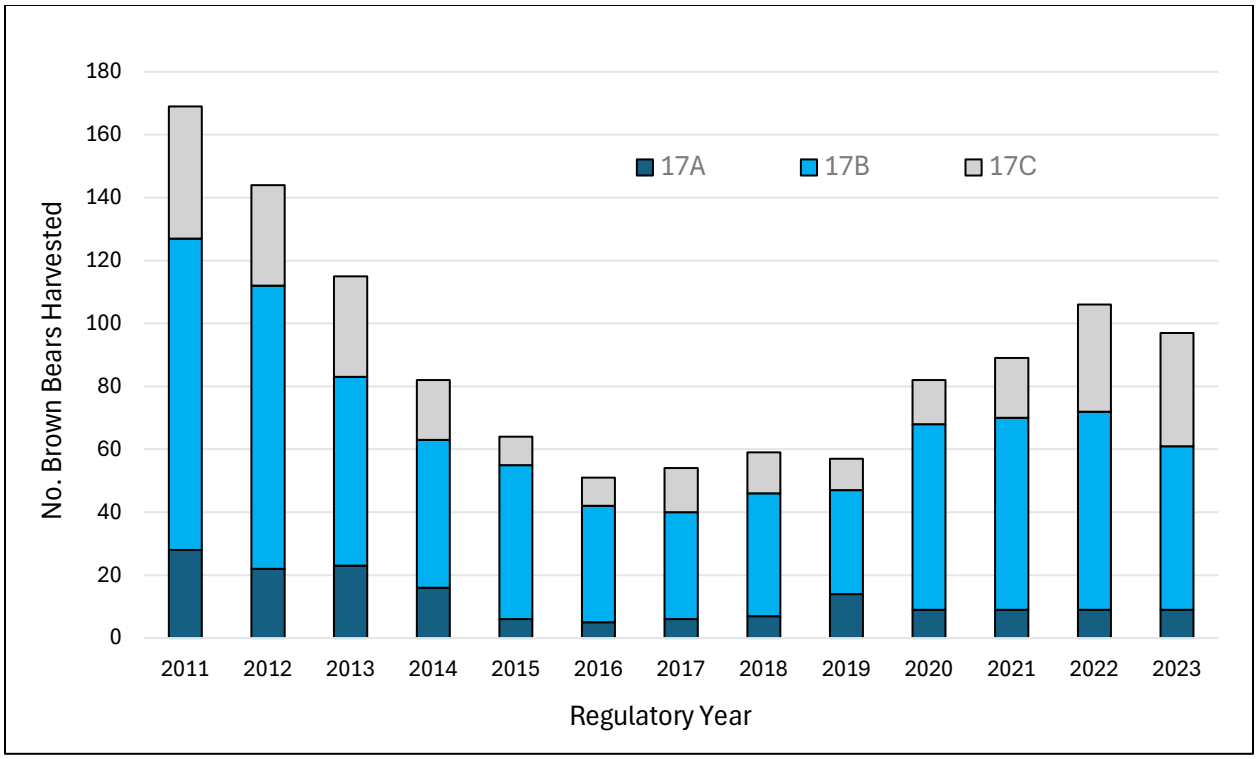

Figure 33-2. Unit 17 brown bear harvest by subunits, regulatory years 2011–2023.

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

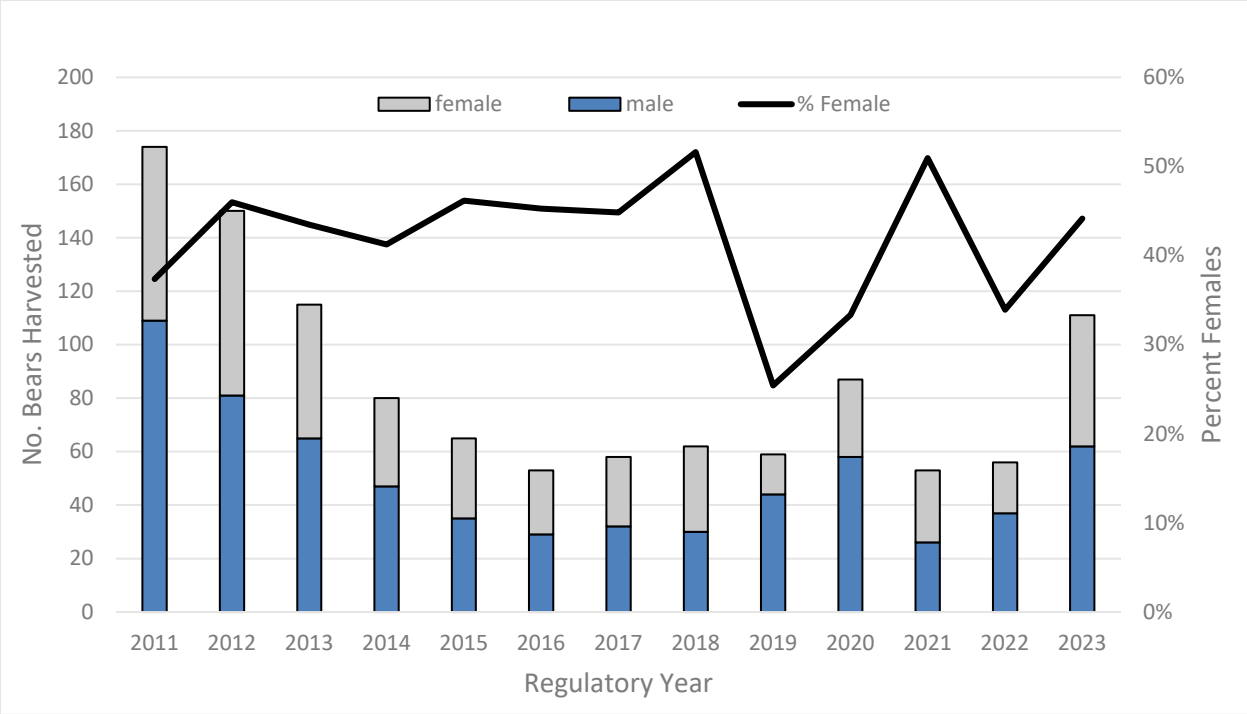

Figure 33-3. Brown bear harvest by sex in Unit 17 from regulatory years 2011-2023.

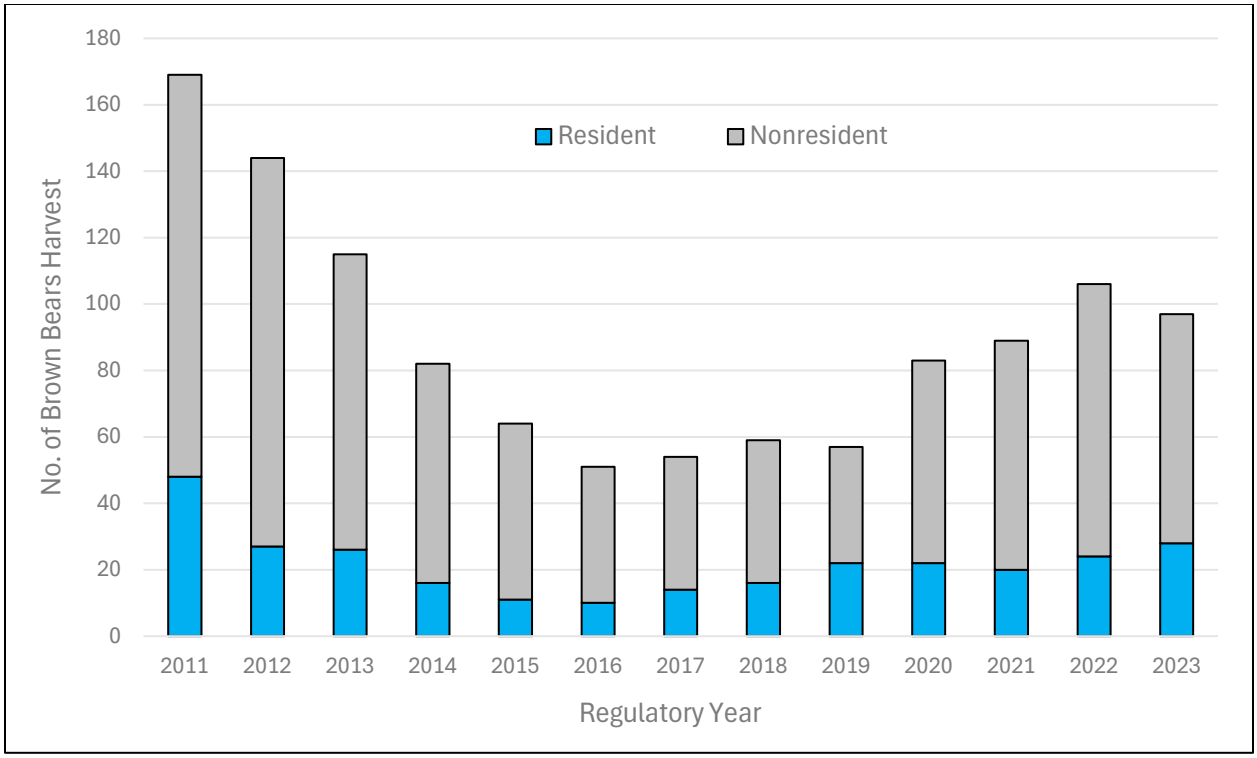

Figure 33-4. Brown bear harvest by residency in Unit 17 from regulatory years 2011–2023.

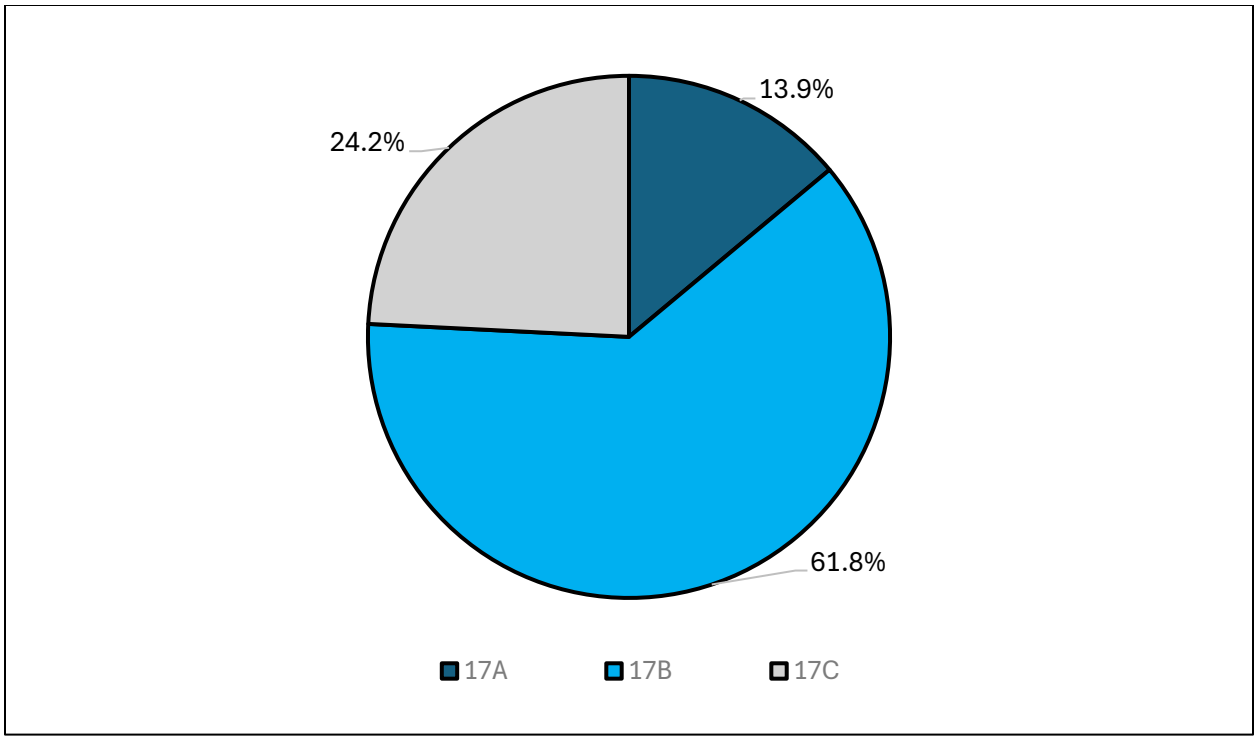

Figure 33-5. Brown bear annual average harvest percentage from Units 17A, 17B, and 17C from regulatory years 2011–2023.

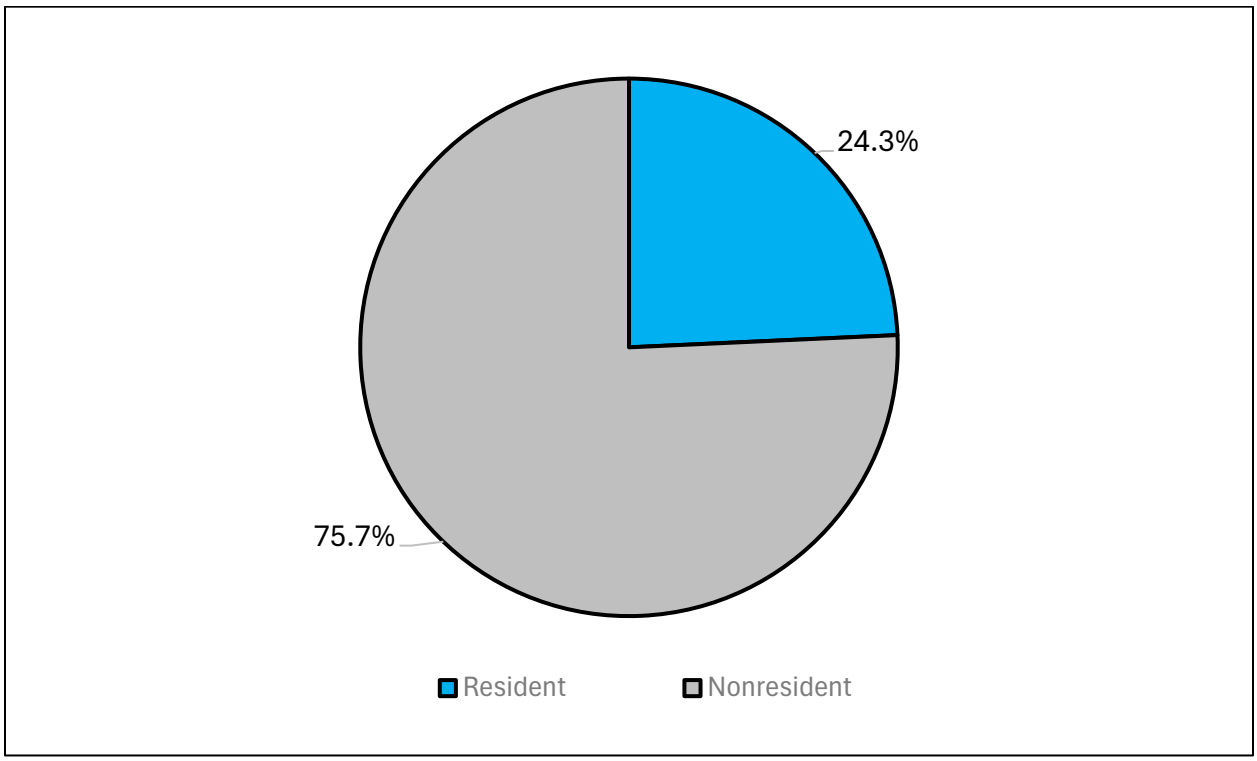

Figure 33-6. Average brown bear harvest percentage by residency status in Unit 17 from regulatory years 2011–2023.

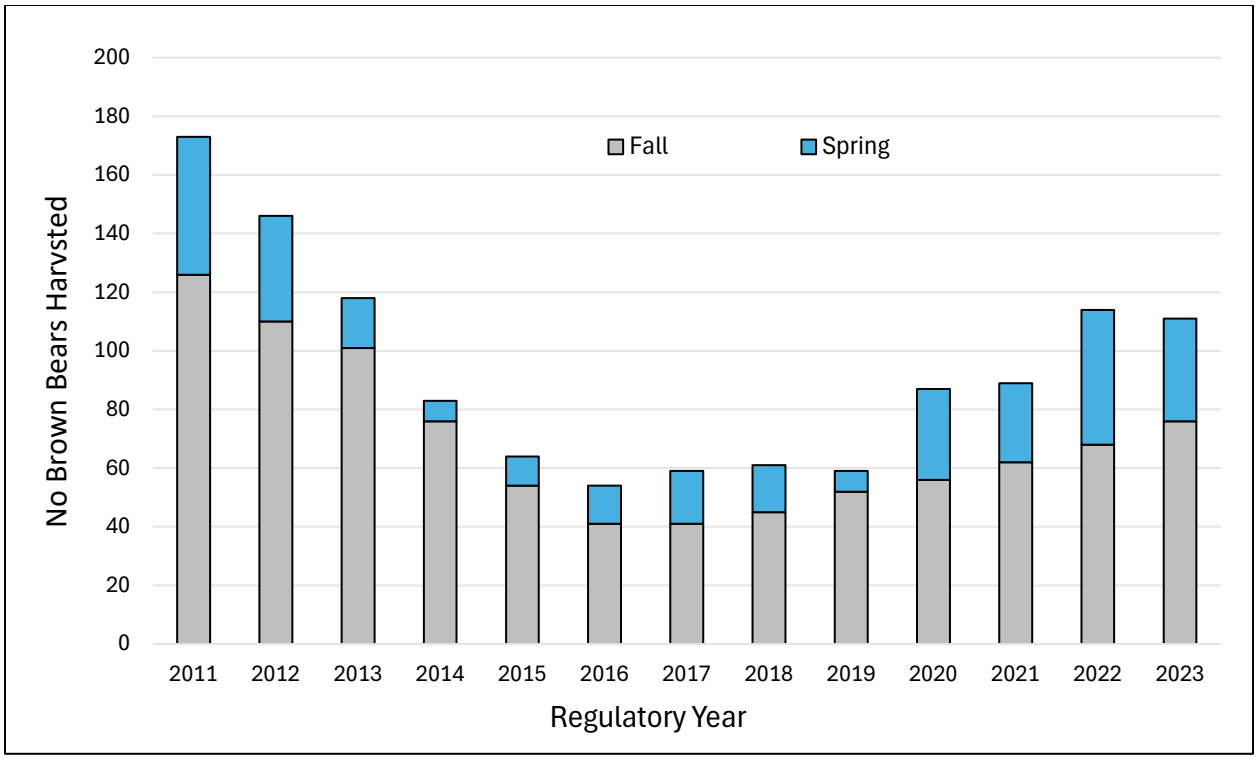

Figure 33-7. Brown bear harvest in Unit 17 by season from regulatory years 2011–2023.

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

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

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

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

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

[a] Each respective year of data is from the ADF&G WinfoNet database; Fur Sealings, Fur Sealing Lookup.
[b] Additional removal may be Defense of Life and Property (DLP), vehicle kills, etc.
[c] In 2017 the Wolf Control Area was expanded to include 9,844 square miles.
[d] Wolf Control Area was expanded in 2022 to 15,584 square miles to include Units 9B, 17B and C, 18, and 19A and B.
[e] Department removal occurred in 1200 square miles in Units 17B, 18, and 19B.
[f] Department removal occurred across two periods (April and May–June) in Units 18 and 19B in 530 square miles.

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

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

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

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

PROPOSED BY: Adam Grenda

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

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

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

5 AAC 92.085 (8)
It is against the law to hunt or help someone take big game until 3:00 am the day following the day a hunter has flown, except.

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

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

  ….

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

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

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

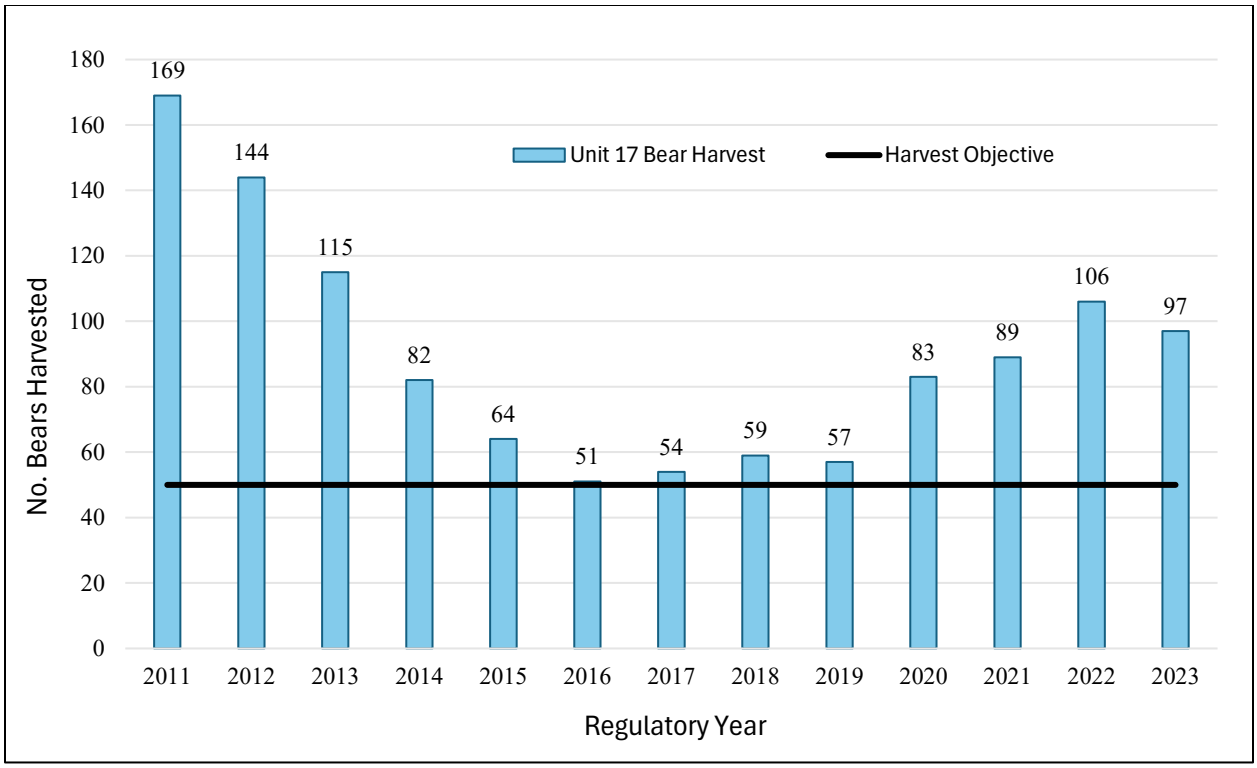

Figure 34-1. Total brown bear harvest in Unit 17 from RY2011–2023 and minimum harvest objective.

In 2003 and 2004 Togiak National Wildlife Refuge conducted dual observer line transect surveys for bears in Unit 17A and southwestern Unit 18 and documented a brown bear population estimate of 40.4 bears per 1,000 km^2 across 16,554 km^2 (Walsh *et al.* 2010). Prior to that, in 1993 through 1997 the department attempted to describe bear densities in the Killbuck mountains east of Bethel and northwest of Dillingham, but were unable to critically assess densities due to political factors that prevented further bear capture and monitoring efforts. Fifty-two independent bears were detected throughout the study area resulting in a minimum density estimate of 18.2 bears per 1,000 km^2 but managers suspected densities at least twice this size.

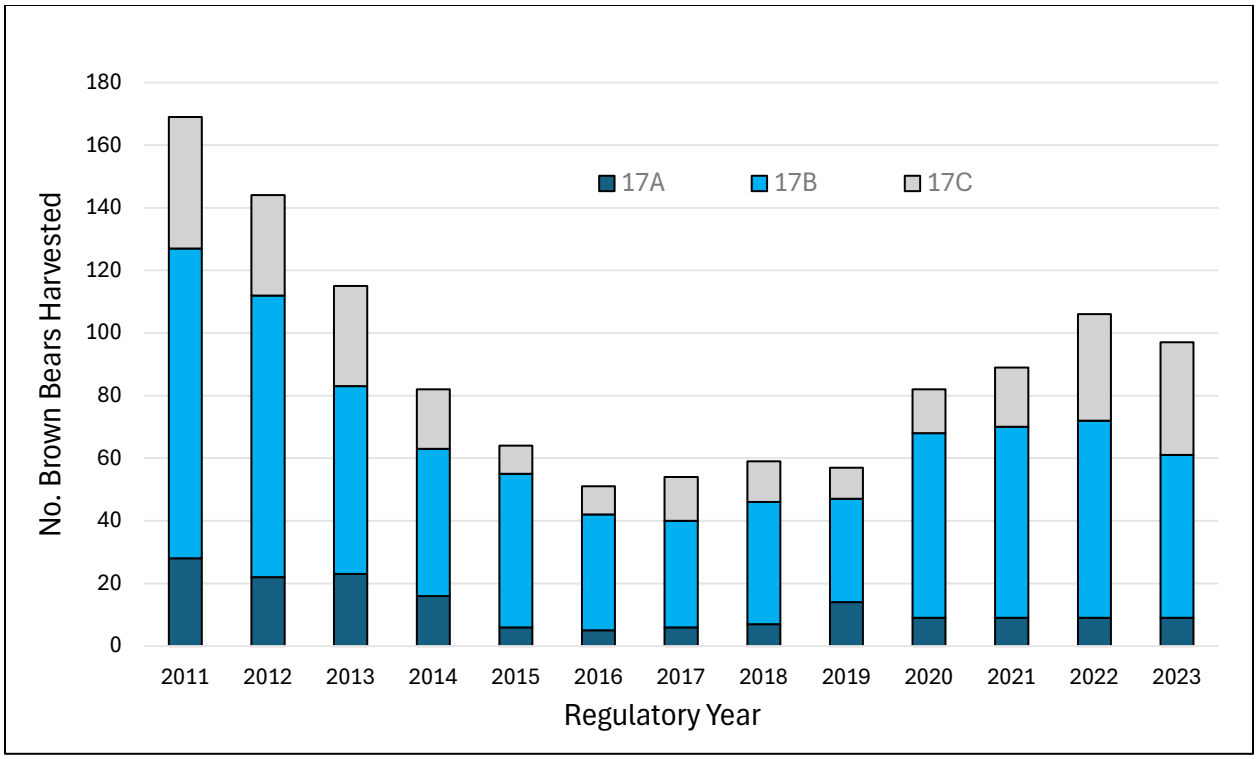

Figure 34-2. Brown bear harvest by 17 subunits for RY2011–2023.

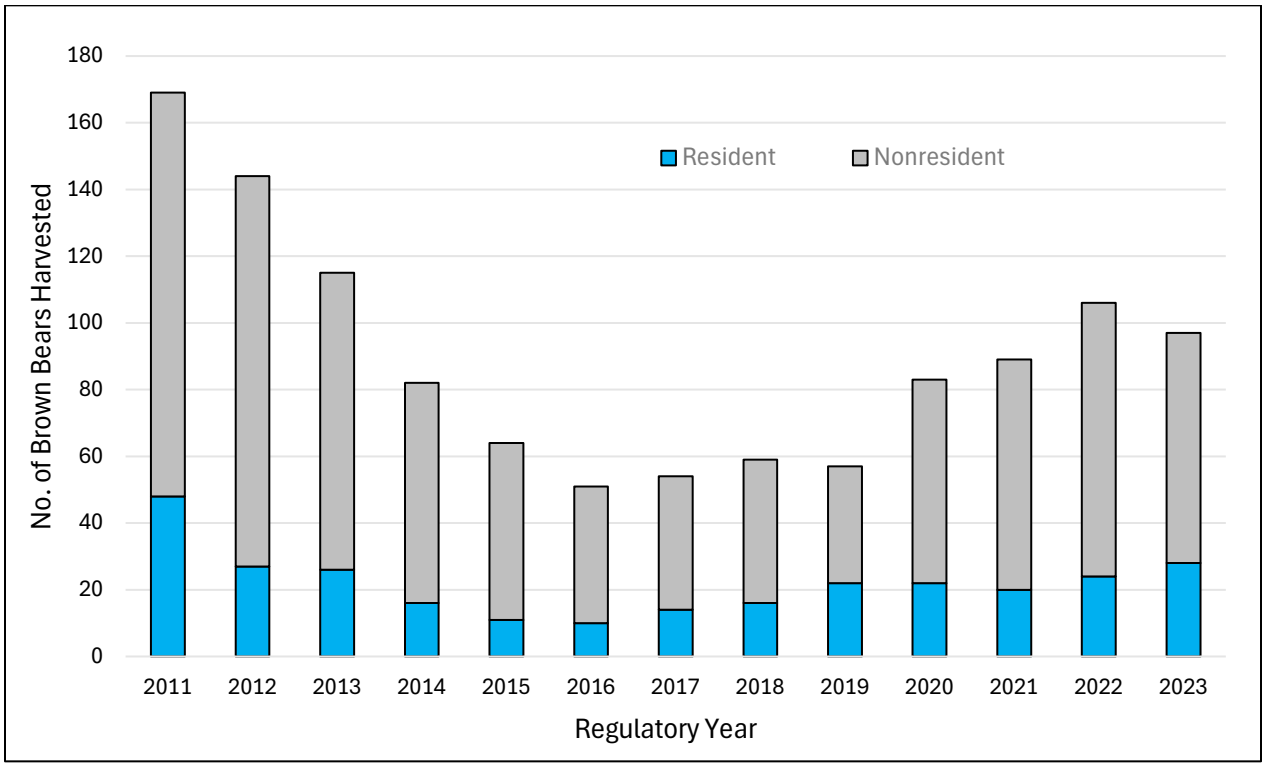

Figure 34-3. Brown bear harvest by residency in Unit 17 from RY2011–2023.

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

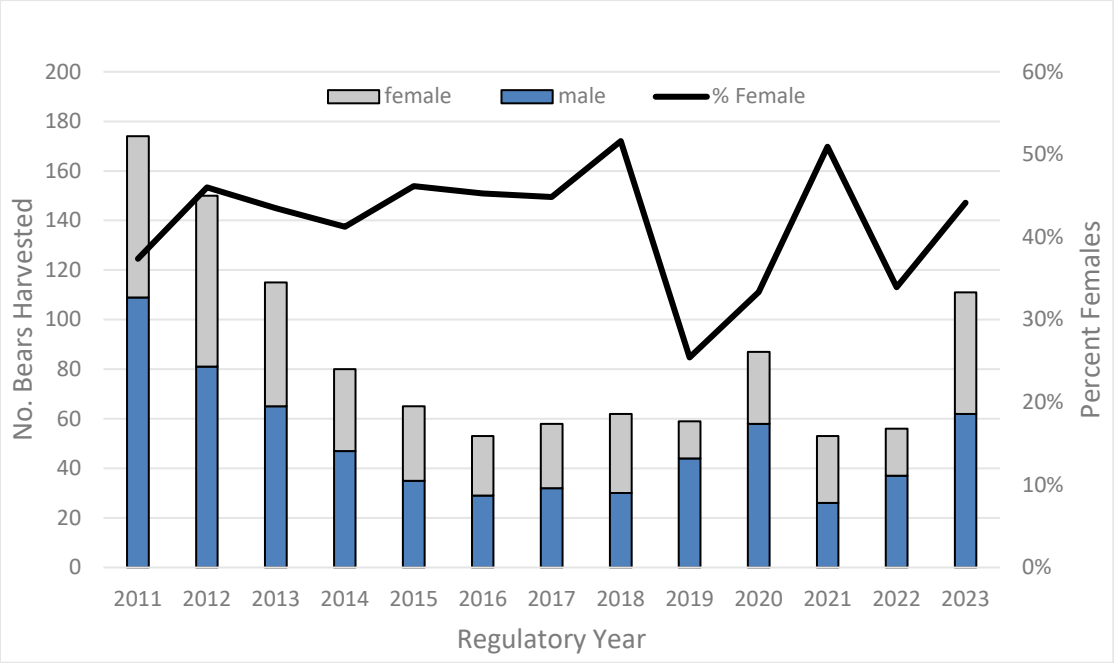

Figure 34-4. Brown bear harvest by sex in Unit 17 from regulatory years 2011-2023.

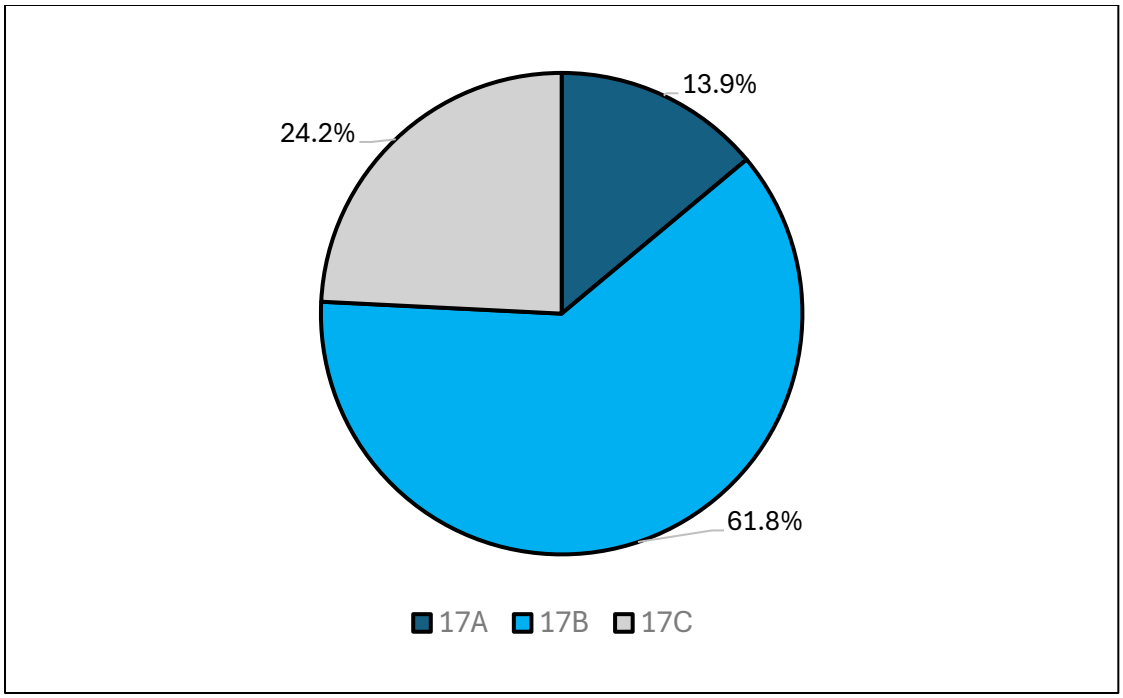

Figure 34-5. Brown bear annual average harvest percentage from Units 17A, 17B, and 17C from RY2011–2023.

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

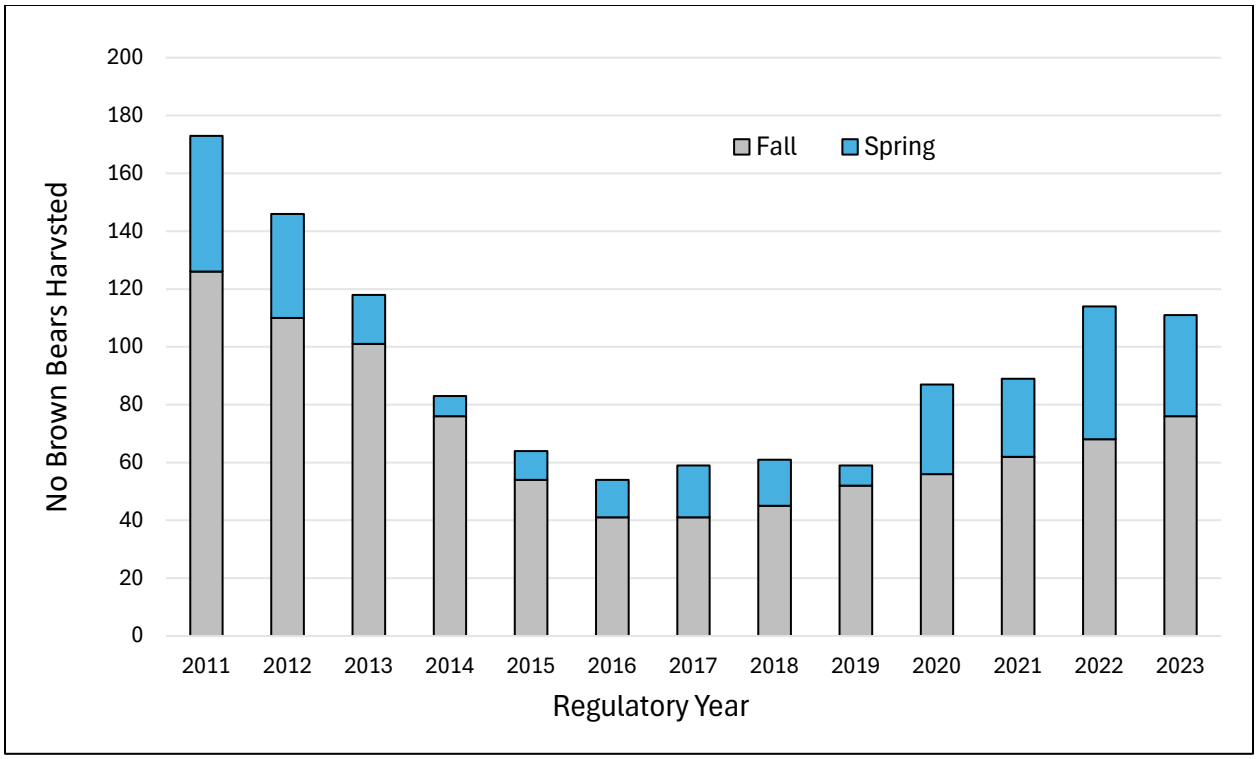

Figure 34-6. Brown bear harvest in Unit 17 by residency from RY2011–2023.

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

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

****

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

PROPOSED BY: Rick Grant

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

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

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

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

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

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

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

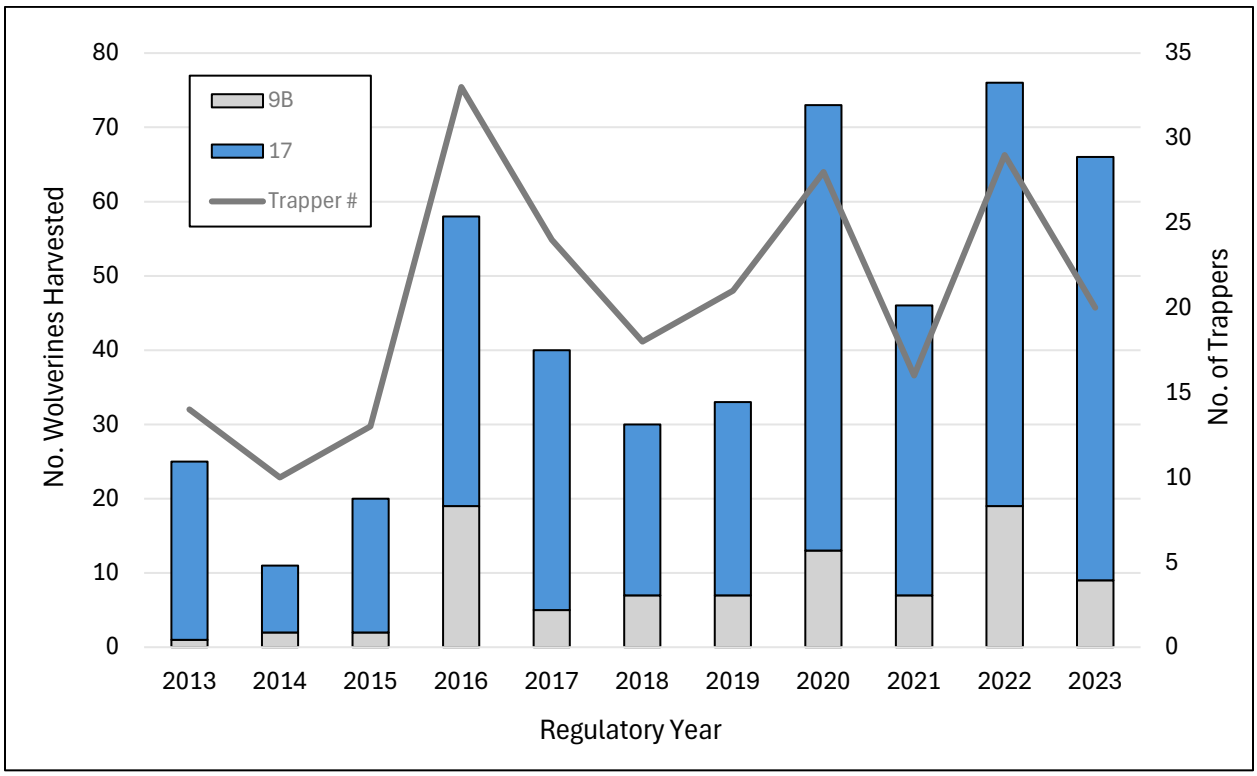

Figure 35-1. Wolverine harvest by units 9B, 17 and 18 and total number of trappers sealing wolverines from RY2013–RY2023.

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

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

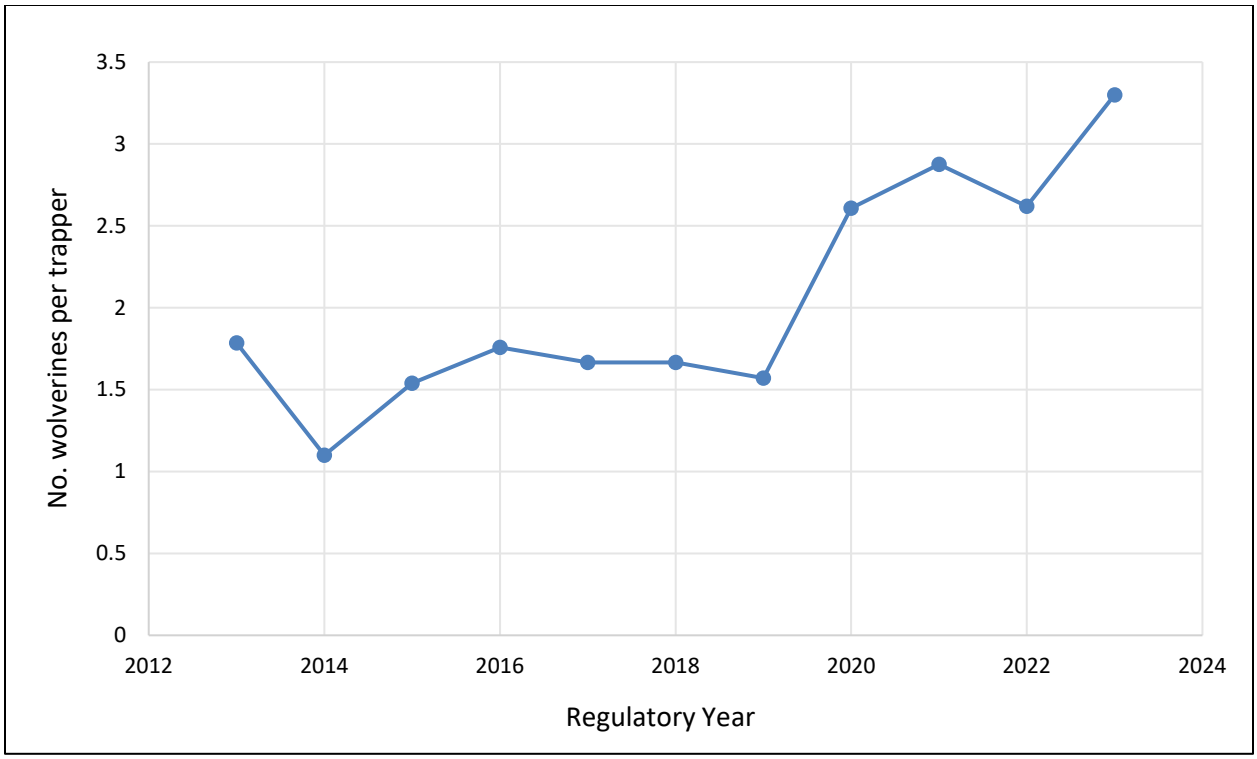

Figure 35-2. Average number of wolverines sealed per trapper in Unit 9B and 17 from RY2013–RY2023.

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

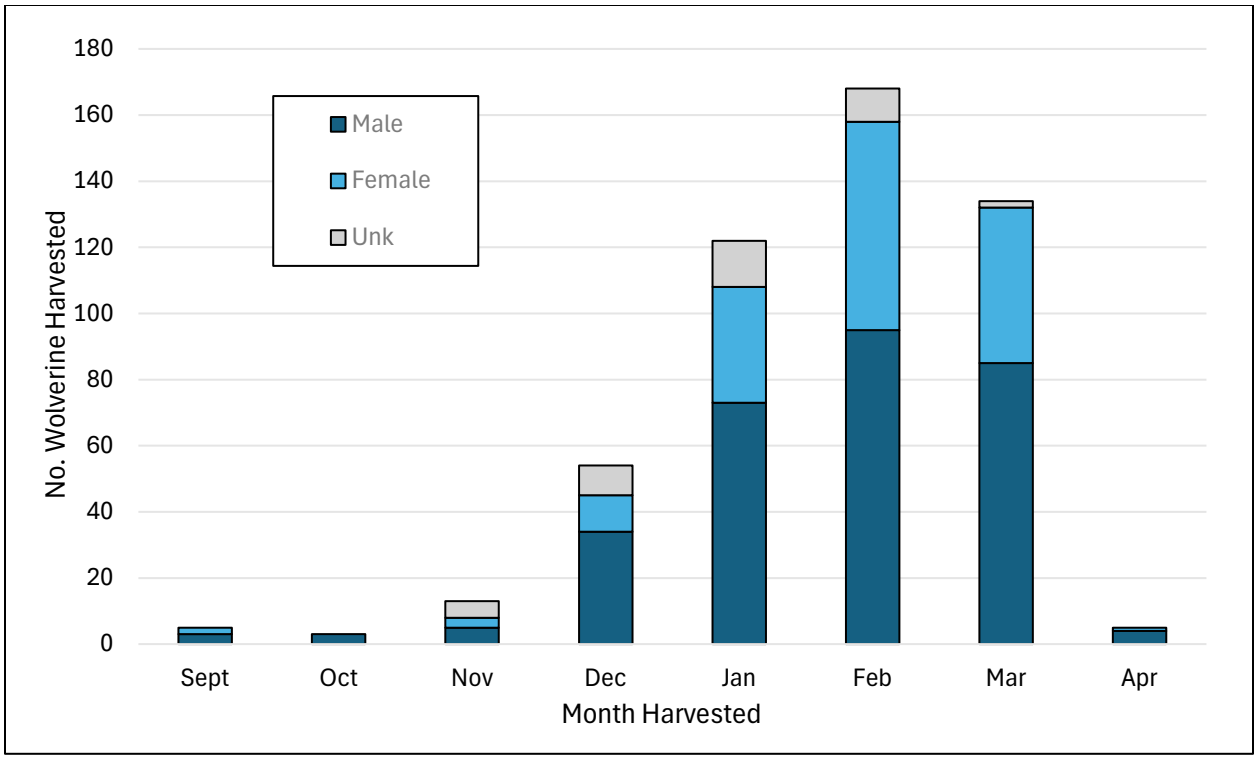

Figure 35-3. Wolverine harvest by month and sex in units 9B and 17 from RY2013–RY2023.

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

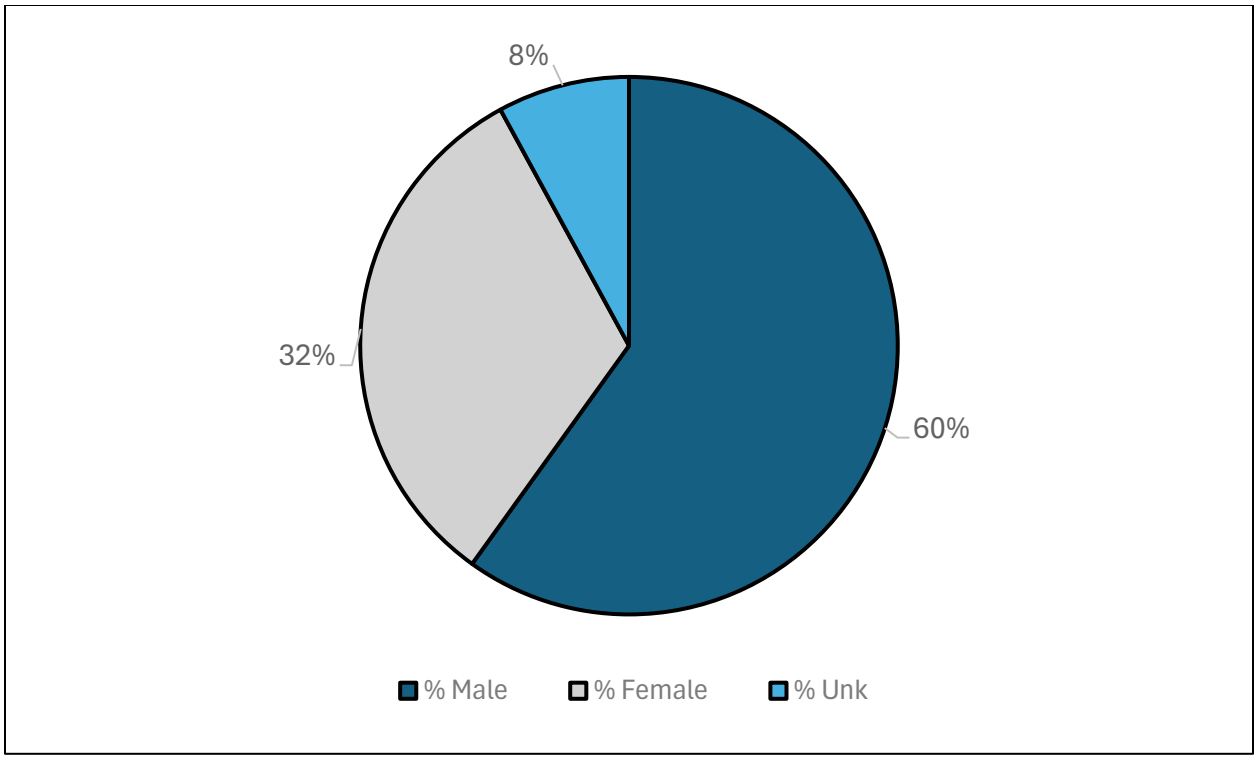

Figure 35-4. Wolverine harvest by sex across units 9B and 17 from RY2013–RY2023.

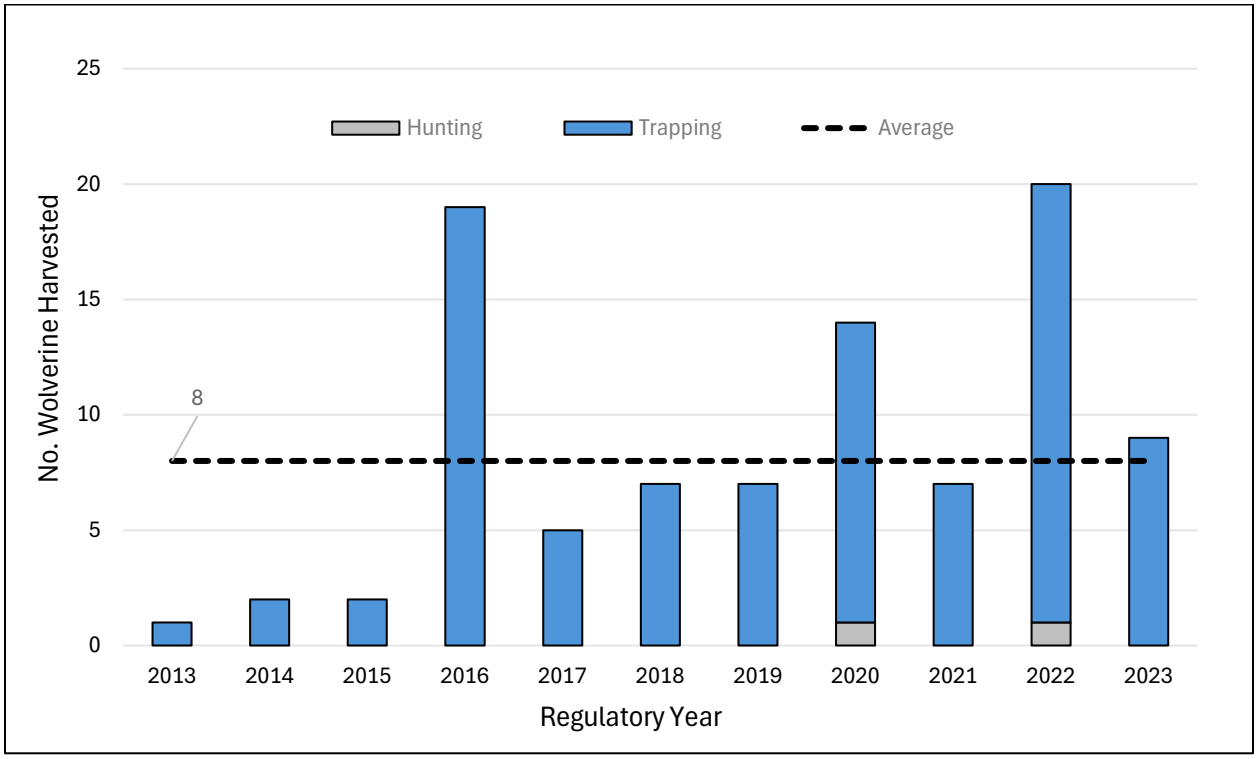

Figure 35-5. Wolverine harvest by regulation type in Unit 9B from RY2013–RY2023.

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

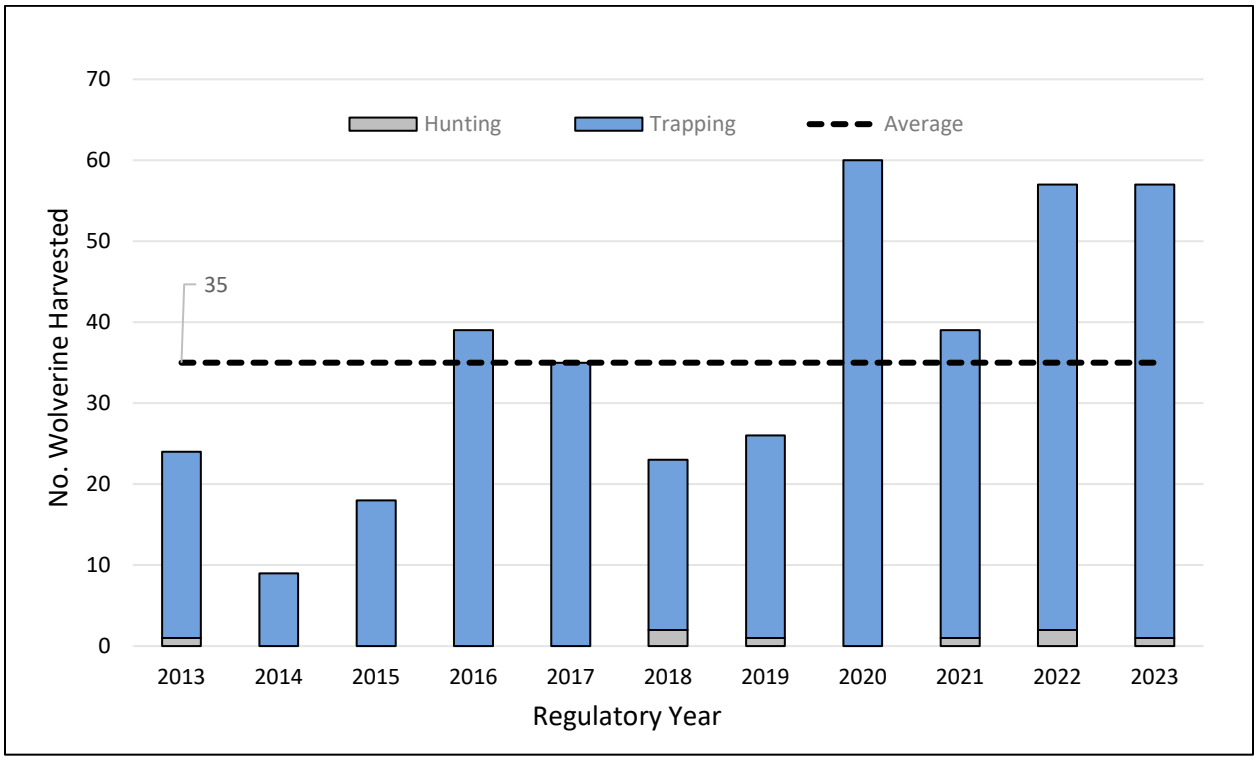

Figure 35-6. Wolverine harvest by regulation type in Unit 17 from RY2013–2023.

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

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

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

PROPOSED BY: Rick Grant

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

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

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

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

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

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

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

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

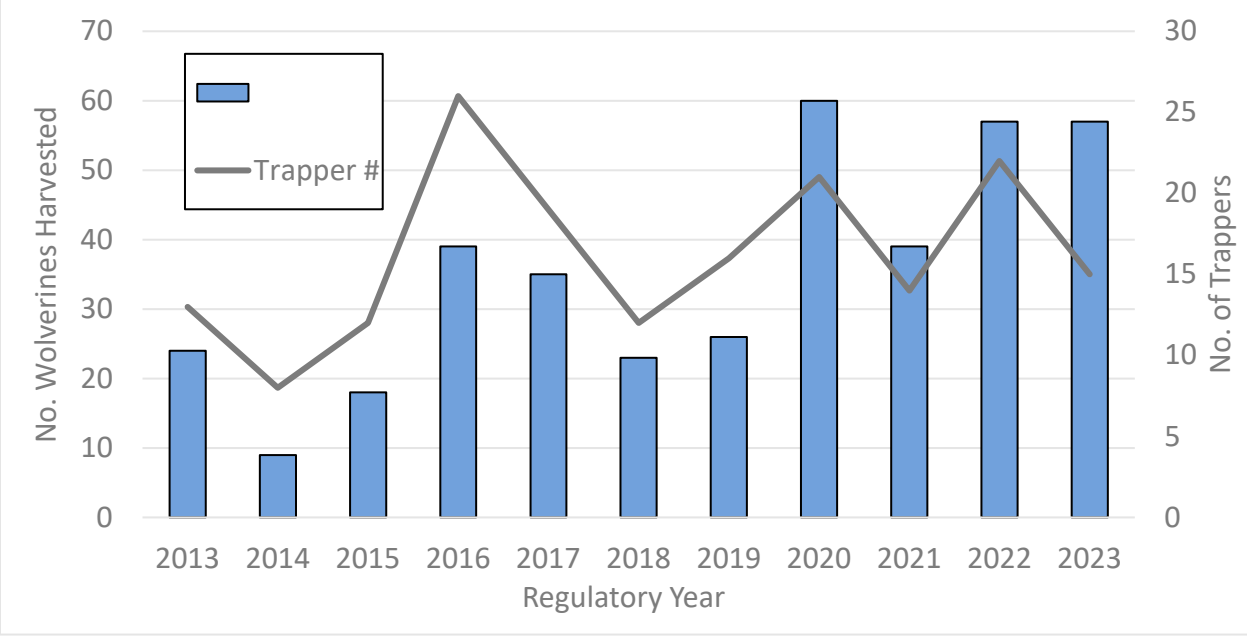

Figure 36-1. Wolverine harvest from unit 17 and total number of trappers per year sealing wolverines from RY2013 through RY2023.

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

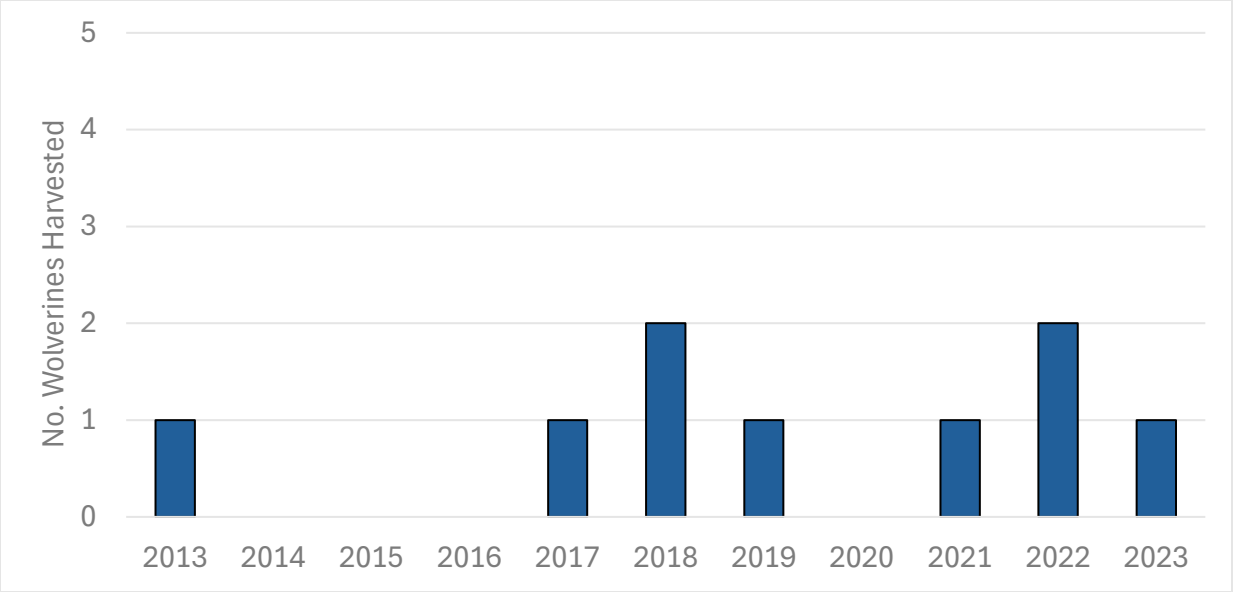

Figure 36-2. Wolverine harvest under hunting regulations from RY2013–2023 in Unit 17.

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

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

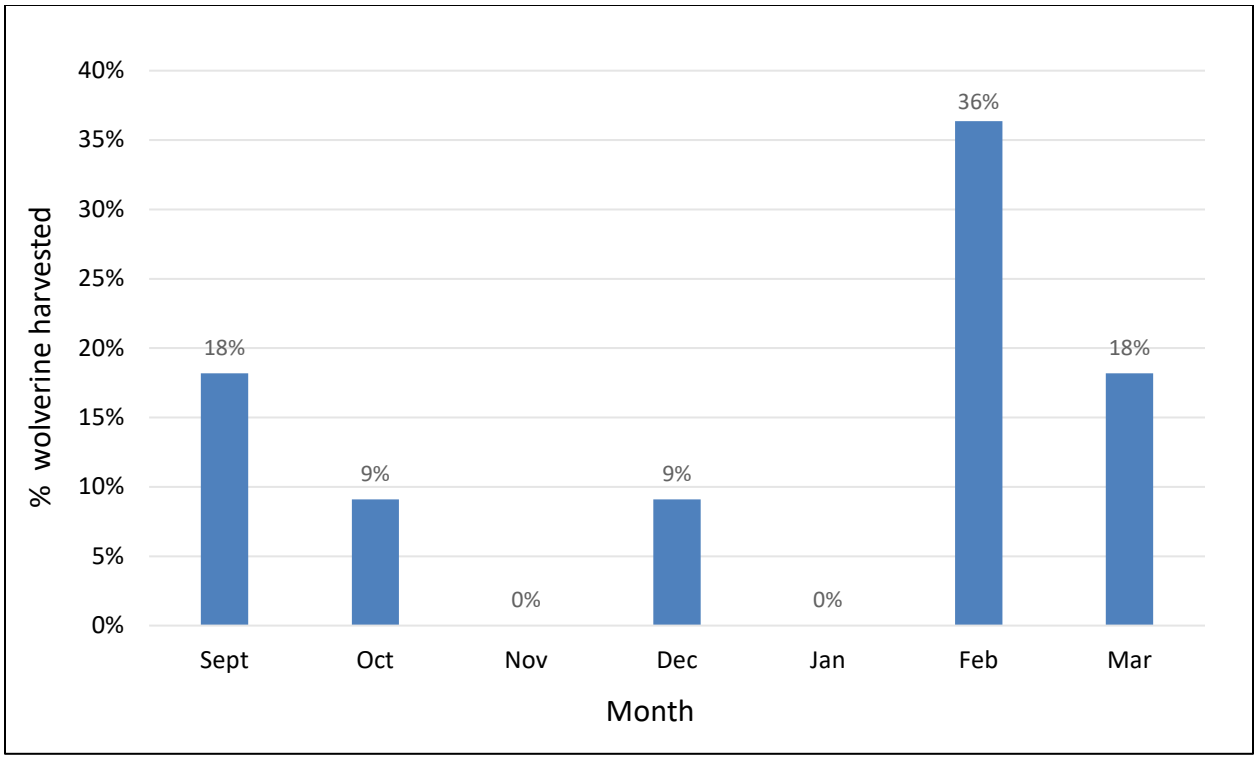

Figure 36-3. Percent of total wolverine harvest by month under hunting regulations Unit 17 from RY2013–2023

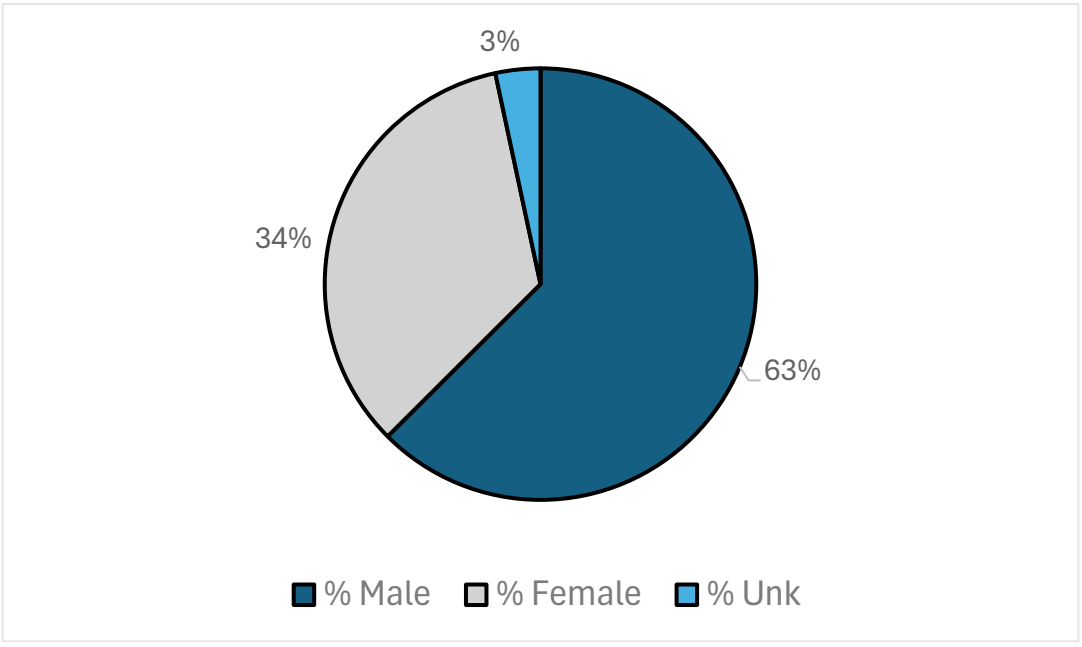

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Figure 36-4. Wolverine harvest by sex through hunting and trapping regulations across Unit 17 from RY2013–2023.

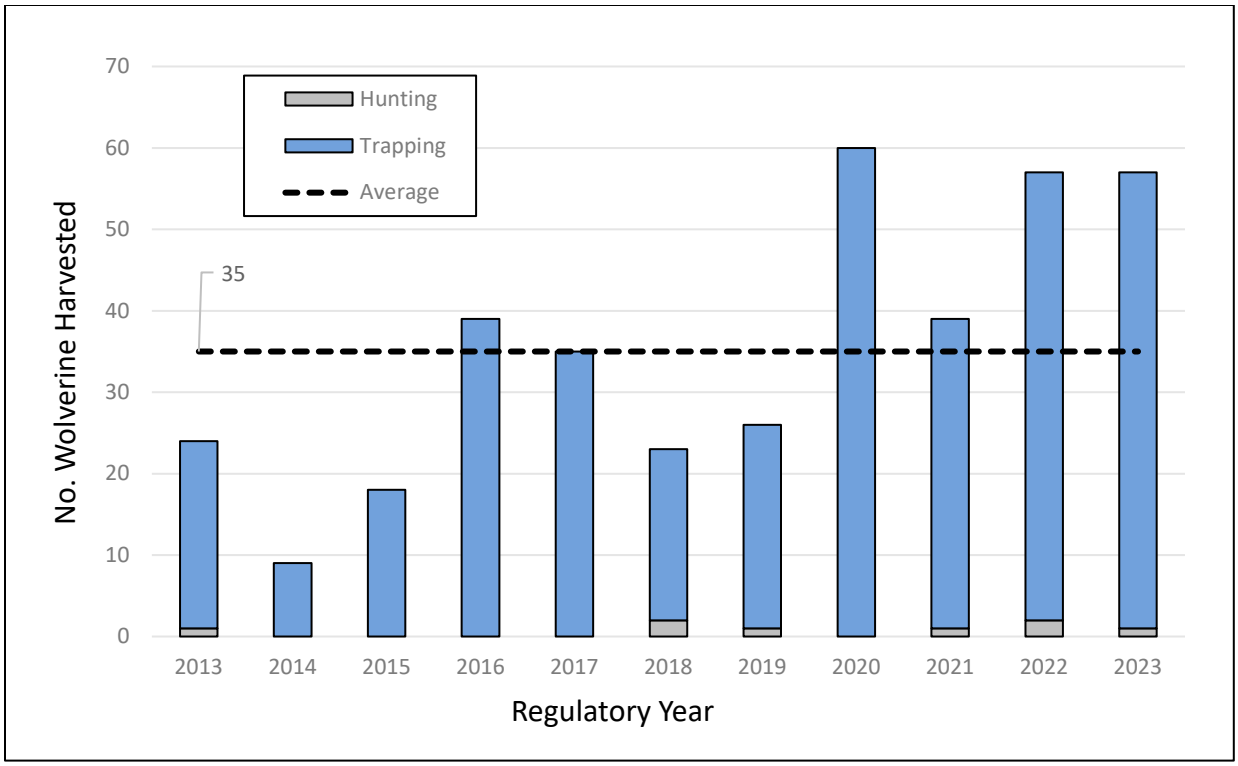

Figure 36-5. Wolverine harvest by regulation type in Unit 17 from RY2013–2023.

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

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

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

PROPOSED BY: Alaska Department of Fish and Game

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

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

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

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

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

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

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

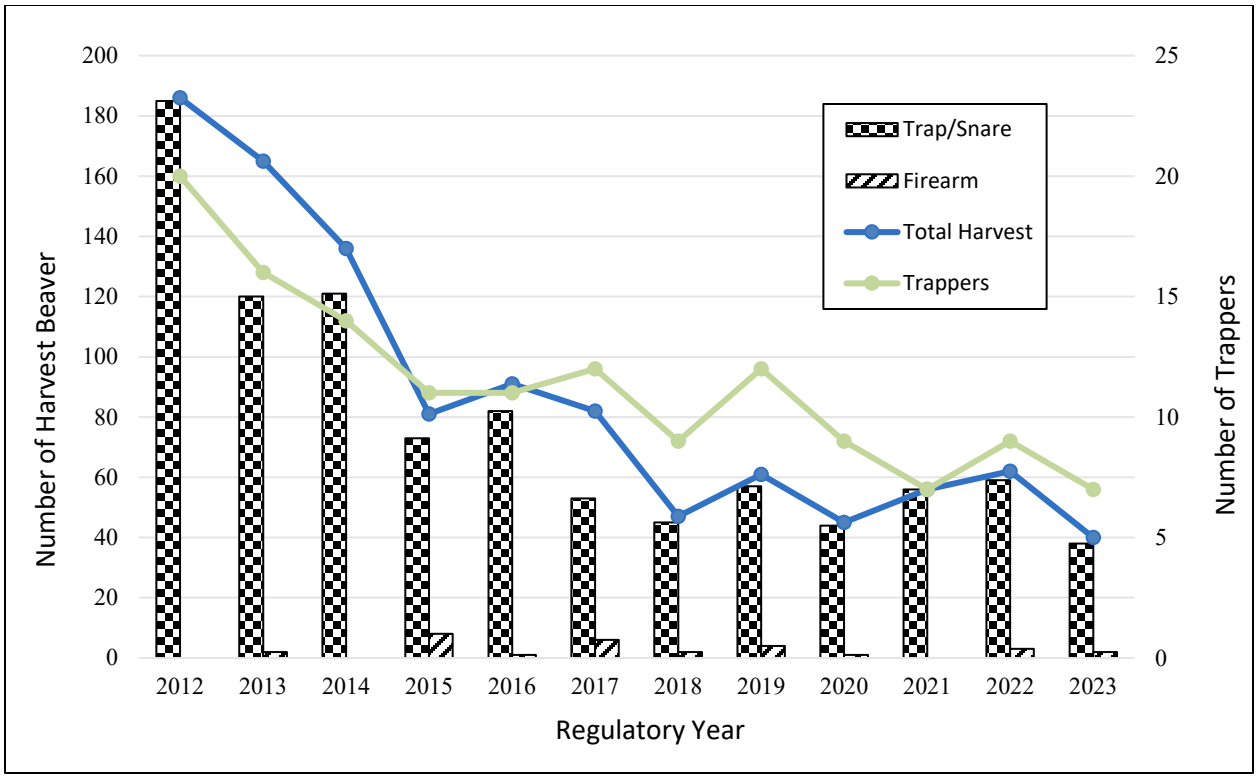

Figure 37-4. Number of harvested beaver and trappers by method of take during regulatory years 2012-2023. Beavers harvested by unknown method are not included in method columns but are reflected in total harvest.

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

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

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

PROPOSED BY: Qayassiq Walrus Commission

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

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

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

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

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

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

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

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

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

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Proposals 39-44

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PROPOSAL 45 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Add five-day archery-only for moose hunting in Unit 13.

PROPOSED BY: Jon Freeman

WHAT WOULD THE PROPOSAL DO? This proposal would add 5 days of archery-only moose hunting opportunity to the general season harvest ticket moose hunt in Unit 13, making the archery-only season dates August 27–31 with the same bag limit as the existing September 1–20 general season hunt (spike or fork or antlers 50" or larger or 4 or more brow tines on at least 1 side).

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

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

- ***CM300*** - Copper Basin Community Subsistence Harvest Hunt:
    - The board has established an allocation of 100 bull moose that do not meet general season antler restrictions (any-bulls) to the Copper Basin CSH. CSH participants have a bag limit of 1 bull from August 20–September 20 if they are in possession of an any-bull locking tag.

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

- ***GM000 -*** Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
- ***DM348 -*** Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
- ***DM335–339 -*** Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from

September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.

- ***FM1301 -*** Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In RY2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board for state hunting of moose and caribou.
- ***Federal Community Hunt:*** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This change would provide additional opportunity for hunters who are not participating in the CSH hunt, which opens August 20 and has no weapons restrictions. Any hunters who are not participating in the CSH hunt could choose to take advantage of the 5 days of early-season opportunity if they wish to hunt with archery equipment only. An early archery-only season with standard general season antler restrictions in Unit 13, when bulls are not as susceptible to calls, is not likely to result in a substantial change to the overall number of antler-legal moose harvested in Unit 13. CSH hunters would still have an early opportunity to harvest spikes, forks, ≥50", or 4 brow-tine bulls (as well as other bulls with the possession of an any-bull locking tag) prior to the archery-only general season opening date of August 27.

BACKGROUND: Over the past 10 years, an average of 4 bulls were harvested using archery equipment in Unit 13 annually (range of 1 to 8), and the vast majority of those bulls are harvested by GM000 general season harvest ticket holders. Two bulls in the past 10 years have been harvested by CM300 hunters using archery equipment, and both of those were harvested in August before the general season hunt opened. Over the past 10 years, 1 bull was harvested by a nonresident draw permit holder using archery equipment. The remaining 39 bulls harvested with archery equipment over the past 10 years were harvested by GM000 permit holders. Of the 40 bulls harvested with archery equipment in September, 42% were harvested prior to September 10 and the remaining 58% were harvested on or after September 10.

With an additional 5 days of archery-only opportunity for the general season hunt in Unit 13, early-season hunters may be drawn to the area, but it is not expected that these hunters would harvest substantially more antler-legal bulls than would be harvested already in Unit 13 (Table 45-1).

As such, the early season may reallocate some bulls from resident general season hunters and nonresident drawing permit hunters to early archery-only general season hunters, but overall antler-legal harvest is not expected to change significantly. At this time the expectation is that this additional opportunity would not have a significant impact on the overall moose harvest in Unit 13.

Table 45-1. Harvest of bull moose in Unit 13 by hunt, RY2014–2023.

Regulatory Year	CM300 [a]	GM000 [b]	Nonresident Draw[c]	Resident Draw[d]	Federal Subsistence[e]	Ceremonial Harvest[f]	Total Harvest
2014	150	676	20	3	86	3	938
2015	171	771	23		85	4	1,054
2016	201	756	21	5	100	3	1,086
2017	188	690	23	5	89	2	997
2018	154	557	20	2	61	2	796
2019	159	652	18	6	71	0	906
2020	138	635	23	5	66	0	867
2021	131	598	22	2	62	2	817
2022	125	470	21	2	54	3	675
2023	108	363	13	3	37	1	525

[a] CM300 season dates: August 20–September 20, bag limit: one bull with spike or fork antlers or antlers ≥ 50" or 4 or more brow tines on at least one side, or any bull with the possession of an any-bull locking tag (maximum of 100 any-bulls may be harvested within the CM300 hunt area).

[b] GM000 season dates: September 1–September 20, bag limit: one bull with spike or fork antlers or antlers ≥ 50" or 4 or more brow tines on at least one side; unknown sex assumed to be male.

[c] Nonresident Draw season dates: September 1–September 20, bag limit: one bull with antlers ≥ 50" or 4 or more brow tines on at least one side; hunt area within Unit 13 depends on permit drawn.

[d] Resident Draw season dates: September 1–September 20, bag limit: one bull; hunt area within Unit 13 depends on year.

[e] Federal Subsistence season dates: August 1–September 20, bag limit: one bull in federal subsistence hunting areas only; unknown sex assumed to be male.

[f] Ceremonial Harvest season dates and bag limits vary; only male harvest reported in this table.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means and allocation for moose harvest. This proposal would provide additional opportunity for archery hunters. If the board chooses to create this new archery only hunt it will need to determine if the hunt should be open to residents only or to residents and nonresidents.

COST ANALYSIS: Adoption of this proposal is not expected to cause additional cost to the department.

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PROPOSAL 46– 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions.

PROPOSED BY: Paxson Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove the Community Subsistence Harvest (CSH) hunt for moose (CM300) from regulation and would establish in its place a different registration hunt to allow the take of up to 100 bulls that do not meet general season antler restrictions in Unit 13 (any-bulls). This new registration hunt would provide a 12-day season (August 15–27) for hunters in Unit 13 to harvest one bull, and antler restrictions may take effect when any-bull quotas for different subunits are met, similar to the current CSH hunt administration. The hunt would not allow the use of motorized vehicles or pack animals to hunt moose or transport hunters/hunting gear/big game except along the Parks, Denali, Richardson, and Glenn Highways. Proxy hunting would be allowed for this registration hunt.

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

The Board of Game has made a positive customary and traditional use (C&T) finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300–600 moose. There is a positive C&T finding for moose in Unit 11 with an ANS of 30–40 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

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

    - The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.
    - No member of a Copper Basin CSH moose hunt household may hold state or federal moose permits outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 13 south of the Little Tok River) or hold general season moose harvest tickets.
    - After the CSH hunt has ended, unsuccessful individual household members may then acquire state or federal moose harvest tickets or permits for other areas if the bag limit is greater than one moose per person.
- ***GM000 -*** Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20.
- ***DM348 -*** Resident hunters who successfully draw a Unit 13D bull moose drawing permit are permitted 1 antlered bull from September 1–September 20; up to 5 permits may be issued.
- ***DM335–339 -*** Nonresident hunters who successfully draw a Unit 13 drawing permit are permitted 1 bull with 50-inch antlers or antlers with 4 or more brow tines on 1 side from September 1–20; up to 150 permits may be issued and each permit is valid for only 1 subunit of Unit 13.
- ***FM1301 -*** Federally qualified subsistence users can obtain a federal moose permit from the Glennallen Field Office of the Bureau of Land Management. The season is August 1–September 20 with a bag limit of 1 antlered bull moose per household for residents that qualify for Unit 13E, or 1 antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal subsistence lands only. In RY2024 and RY2025, these lands in Unit 13B were closed by the Federal Subsistence Board for state hunting of moose and caribou.
- ***Federal Community Hunt:*** Federally qualified subsistence users can obtain community hunt permits for moose valid for Units 11 and 13 from the Ahtna Intertribal Resources Commission in Glennallen. Seasons and bag limits correspond with those of existing federal subsistence hunting opportunities in those areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH hunt for moose in Unit 13 would be replaced by a 12-day any-bull registration hunt opportunity with motorized restrictions. The current season dates for the CSH hunt allow up to 32 days of any-bull harvest opportunity, but actual season dates vary by year and by area, as any-bull quotas are sometimes met before the scheduled season closure and antler restrictions are implemented in those areas by Emergency Order. In some years some subunits have had any-bull harvest opportunity as short as 5 days before any-bull quotas were met and antler restrictions were

implemented, while other subunits may run the full 32 days of the season without antler restrictions in the same year. In RY2013 all any-bull harvest opportunity was converted to antler restrictions by August 16, resulting in only 7 days of any-bull harvest opportunity for the entirety of Unit 13. The proposed registration hunt would represent a decrease in potential any-bull harvest opportunity of 20 days.

Since 2016, 58% of the bulls harvested by CSH hunters that do not meet general season antler restrictions are taken within the first 12 days of the season, but the season starts 5 days later than the proposed 12-day registration hunt season dates. The average number of days hunted by successful hunters over the history of the CSH hunt is 4.2 days, regardless of the antler status of the bull harvested. It is unclear whether adoption of this proposal will affect the ultimate opportunity or chance of success for subsistence moose hunters in Unit 13, or their ability to participate in the customary and traditional use pattern described in the Board's 2006 Findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG). The designated hunter option for the CSH hunt would be replaced with the ability to proxy hunt for the any-bull registration permit but it is unclear if proxy regulations would provide adequate opportunity for the communal pattern of use identified for moose in Unit 13.

The additional CSH salvage requirements and the requirement to hunt moose only in Unit 13 would be removed, which would make the any-bull registration permit a very popular hunt even with early season dates and motorized restrictions. The 24-hour reporting requirement would remain the same as the current CSH reporting requirement. With motorized access limited to major highways the any-bull harvest is not expected to be achieved very rapidly, and subunits may remain open through the scheduled 12-day season if any-bull quotas for entire subunits are not met. The BOG should determine if the communal pattern of use identified in Unit 13 is still being provided for if this proposal is adopted. The Unit 13 ANS for moose would likely still be achieved in most years, as it is generally achieved now with general season harvest and federal subsistence harvest combined. The BOG should also determine if the CSH hunt would remain in place for Units 11 and 12, and how this proposal might impact those units, specifically if an any-bull opportunity would be offered in Unit 11. Unit 12 is not on the call for the Central Southwest Region Board of Game meeting.

BACKGROUND: Since its inception in RY2009 the Copper Basin Community Subsistence Harvest (CSH) hunt has had a long and contentious history including litigation in 2010 and proposals submitted in every Board of Game cycle since then to eliminate hunt or modify the hunt structure. As such, the hunt has undergone continuous evolution with each Board cycle with changes over the years including season dates, salvage requirements, group eligibility requirements, reporting requirements, two-year commitments, etc. The hunt remains contentious with a variety of public opinions for and against this unique hunt structure. The Copper Basin CSH hunt area includes Units 11, 13, and a portion of 12.

The CSH hunt was implemented to provide opportunity for a communal pattern of use as well as opportunity to participate in the customary and traditional use pattern described in the Board's 2006 Findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG). There are 8 criteria listed in these findings:

1. A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.
2. A pattern of taking or use recurring in specific seasons of each year.
3. A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.
4. The area in which the noncommercial long-term, and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.
5. A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.
6. A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.
7. A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trad, barter, and gift-giving.
8. A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

One popular aspect of the Copper Basin CSH hunt is the "designated hunter" option that allows any hunter within a group to harvest on another group member's permit, thereby allowing for a communal pattern of use that has been acknowledged by the BOG. In recent years more than 30% of CSH moose were harvested by designated hunters. While proxy hunting would be an option for an any-bull registration permit in Unit 13, proxy regulations are more limiting compared to the designated hunter option, as proxy recipients must 65 years or older, legally blind, or have 70% or greater physical disability (affidavits required for the latter 2 options).

Unit 13 has a long history of any-bull harvest opportunity, which has recently brought bull-to-cow ratios down to objectives in some subunits. In RY2010 the CSH hunt was not offered due to legal litigation, but it was reinstated in 2011 with a quota of 70 any-bulls. The hunt became increasingly popular annually (Table 46-1). From RY2012 to RY2013 the number of groups participating jumped from 19 to 45, and the any-bull quota was raised to 100 in 2013, but the rapid harvest early in the season resulted in any-bull closures 4–6 days after the season opened for all subunits. A five-day reporting requirement complicated hunt administration with high levels of participation in 2013, so in RY2014 a 24-hour reporting requirement and locking tag system was implemented. One locking tag was issued for every 3 households in each group. The overall quota was lowered to 90 any-bulls in RY2014, and returned to 100 in RY2015, which has been the overall quota since.

Effective in RY2016, the CSH moose season start date in Unit 13 was moved from August 10 to August 20 but harvest remained high.

Table 46-1. Copper Basin CSH Hunt participation and harvest, RY2009–2023.

Regulatory Year	Number of Groups	Number of Permits	Hunters Reported Hunting	Number of Locking Tags	Total CSH Moose Harvest	CSH Any-Bull Harvest[1]
2009	1	378	293	-	100	70
2010[2]	-	-	-	-	-	-
2011	9	753	312	-	86	64
2012	19	961	358	-	98	76
2013	45	2,066	842	-	156	85
2014	43	1,771	607	281	150	76
2015	43	1,984	621	344	171	92
2016	73	3,023	941	485	201	114
2017	83	3,136	879	521	188	102
2018	57	2,331	664	354	154	92
2019	61	2,143	590	350	159	94
2020	49	1,703	657	352	138	80
2021	54	1,841	605	350	131	85
2022	47	1,703	609	350	125	65
2023	52	1,757	575	350	108	65

[1] Federally qualified subsistence users and DM324 permitholders harvest additional "any-bulls" in Unit 13.
[2] The CSH hunt was not offered in 2010 due to litigation.

The locking tag system slowed harvest and allowed for a manageable hunt. In RY2014–2017 there were Unit 13 subunits each year that did not reach quotas and Unit 11 did not reach its quota (Tables 46-2 through 46-7). Unit 13 subunits that did reach quotas did so far later in the season. Participation, however, continued to increase. To limit the number of locking tags issued for the 100 any-bulls, the BOG determined that, starting in RY2018, 350 locking tags would be issued to CSH participants based on pre-established scoring criteria. Also beginning in RY2018, groups that successfully applied to participate in the CSH hunt were locked-in for a two-year commitment.

Following these changes, 13B was the only subunit in RY2018 that closed to any-bull harvest prior to the end of the regular season and in RY2019, 13A-East and 13E were the only subunits to close to any-bull harvest prior to the end of the regular season. In RY2020, 13A-East closed just prior to the end of the regular season, and 13E closed at the end of August. In RY2021 13E was the only subunit to close prior to the end of the season, closing on September 8. In RY2022 13E closed at the end of August, 13A-East closed on September 10, and 13C closed on September 15. In RY2023 no subunits closed prior to the regularly scheduled season end dates.

Table 46-2. CSH any-bull harvest and bull-to-cow ratios in Unit 13A, RY2009–2023.

Regulatory Year	Quota[1]	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	20	15	September 17	28
2010[2]	--	-	-	-
2011	10	10	August 17	26
2012	12	15	August 15	26
2013	16	42	August 14	21
2014	6	8	August 14	28
2015	10	9	No early closure	25
2016	10	9	No early closure	19
2017	10	12	September 15	27
2018	10	10	No early closure	24
2019	5	8	August 26	-
2020	5	6	September 17	25
2021	5	6	No early closure	28
2022	5	5	September 10	26
2023	5	2	No early closure	26

[1] Starting in 2014, Unit 13A any-bull harvests have not been allowed in that portion of 13A west of Lake Louise Road, Lake Louise, Lake Susitna, Lake Tyone, and the Tyone River.
[2] The CSH hunt was not offered in 2010 due to litigation.

Table 46-3. CSH any-bull harvest and bull-to-cow ratios in Unit 13B, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	25	23	No early closure	36
2010[1]	-	-	-	-
2011	20	13	August 12[2]	35
2012	17	23	September 3	33
2013	26	23	August 16	38
2014	26	25	August 26	38
2015	30	35	September 14	37
2016	30	31	September 2	34
2017	30	34	September 8	33
2018	30	33	September 18	34
2019	34	34	No early closure	29
2020	34	24	No early closure	28
2021	30	27	No early closure	30
2022	30	20	No early closure	32
2023	30	21	No early closure	31

[1] The CSH hunt was not offered in 2010 due to litigation.
[2] In 2011 there was a 5-mile corridor on either side of the Denali Highway in 13B with a quota of 6 “any-bulls” that closed on August 12, but the remainder of the unit remained open through September 20.

Table 46-4. CSH any-bull harvest and bull-to-cow ratios in Unit 13C, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	15	11	No early closure	42
2010[1]	-	-	-	-
2011	10	13	No early closure	30
2012	10	14	September 17	30
2013	16	1	August 16	44
2014	16	9	No early closure	37
2015	18	8	No early closure	30
2016	18	20	No early closure	34
2017	18	11	No early closure	16
2018	18	7	No early closure	21
2019	18	12	No early closure	26
2020	18	6	No early closure	24
2021	10	9	No early closure	20
2022	7	6	September 15	23
2023	7	7	No early closure	24

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

Table 46-5. CSH any-bull harvest and bull-to-cow ratios in Unit 13D, RY2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio CA15[2]	Post-hunt Bull:Cow Ratio CA15&25[3]
2009	10	7	No early closure	-	-
2010[1]	-	-	-	-	-
2011	5	7	August 17	62	-
2012	8	8	August 28	67	-
2013	11	7	August 16	89	-
2014	11	13	August 31	69	-
2015	14	14	September 9	58	-
2016	14	15	September 2	89	-
2017	14	16	September 12	-	-
2018	14	17	No early closure	-	-
2019	16	13	No early closure	70	-
2020	16	17	No early closure	82	-
2021	28	15	No early closure	84	-
2022	33	13	No early closure	88	47
2023	32	11	No early closure	138	53

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

[2] As observed in the traditional count area surveyed in Unit 13D since 1965.

[3] In response to increasing any-bull harvest in Unit 13D an additional count area was established in 2022 to provide additional survey coverage over a heavily hunted portion of Unit 13D; results are from both Unit 13D survey areas combined.

Table 46-6. CSH any-bull harvest and bull-to-cow ratios in Unit 13E, RY2009–2023.

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

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

Table 46-7. CSH any-bull harvest and bull-to-cow ratios in Unit 11, 2009–2023.

Regulatory Year	Quota	Harvested	Any-Bull Early Closure Date	Post-hunt Bull:Cow Ratio
2009	15	0	No early closure	-
2010[1]	-	-	-	-
2011	10	1	No early closure	71
2012	10	0	September 17[2]	84
2013	10	0	No early closure	88
2014	10	0	No early closure	-
2015	2	0	No early closure	50
2016	2	1	No early closure	-
2017	2	0	No early closure	58
2018	2	0	No early closure	-
2019	2	0	No early closure	-
2020	2	0	No early closure	80
2021	2	0	No early closure	71
2022	2	0	No early closure	81
2023	2	0	No early closure	61

[1] The CSH hunt was not offered in 2010 due to litigation.
[2] All any-bull harvest opportunity was closed on September 17th as the overall any-bull quota of 70 had been met for the year in 2012.

Unit 13 has a long history of any-bull harvest opportunity, which has recently brought bull-to-cow ratios down to objectives in some subunits. Any-bull quotas would be established in the same way that they currently are, and antler restrictions would be implemented when quotas are met in

respective subunits, so overall any-bull harvest would not increase with the implementation of this proposal. Bull-to-cow ratios in Units 13A, 13B, 13C, and 13E have been dropping since 2013 (Tables 46-2 through 46-7). Any-bull quotas are reevaluated annually based on bull-to-cow ratios, to prevent ratios from dropping below the objective of 25 bulls per 100 cows. Units 11 and 13D maintain high bull-to-cow ratios and additional harvest is available in these areas, but in the past 6 seasons the current harvest quotas have not been met prior to the end of the regularly scheduled season. Over the past 5 years, 59% of CSH moose harvest in Unit 13 has occurred in August and any-bulls from the CSH hunt account for an average of 10% of Unit 13 harvest annually (Table 46-8).

Table 46-8. Moose harvest in Unit 13 by hunt, RY2019–2023.

RY	CSH Harvest	Percent of CSH Harvest taken in August	General Season Harvest	Resident Draw Harvest	Nonresident Draw Harvest	Federal Harvest	Total Harvest[1]	CSH Any-Bulls Percent of Total Harvest
2019	159	60%	652	6	18	71	906	10%
2020	138	63%	635	5	23	66	867	9%
2021	131	56%	598	2	22	62	817	10%
2022	125	61%	470	2	21	54	675	10%
2023	108	53%	363	3	13	37	525	12%

[1]Includes ceremonial harvest reported in Unit 13.

Over the past five years, 22% of successful CSH moose hunters use highway vehicles or "other" transportation and no successful CSH hunters used pack animals; ATVs or ORVs are the most popular means of transportation for successful hunters (Table 46-9). ATVs or ORVs are also the most popular means of transportation for successful general season moose hunters in Unit 13, but highway vehicles and "other" transportation are only used by 9% to 12% of successful general season hunters annually (Table 46-10).

Table 46-9. Unit 13 CSH moose harvest by transportation method, RY2019–2023.

RY	Airplane	Horse/Dog Team	Boat	ATV or ORV	Highway Vehicle/ Other	*n*
2019	1%	0%	1%	74%	25%	159
2020	1%	0%	1%	76%	22%	138
2021	0%	0%	3%	70%	27%	131
2022	0%	0%	2%	72%	25%	124
2023	0%	0%	6%	82%	11%	108

Table 46-10. Unit 13 general season moose harvest by transportation method, RY2019–2023.

RY	Airplane	Horse/Dog Team	Boat	ATV or ORV	Highway Vehicle/ Other	*n*
2019	6%	0%	6%	77%	11%	652
2020	5%	0%	4%	78%	12%	635
2021	5%	0%	5%	80%	10%	600
2022	5%	0%	6%	77%	11%	470
2023	4%	0%	5%	80%	9%	364

The proponent states that motorized restrictions during the proposed August registration hunt, in place of the CSH hunt, "levels the field and allows locals a significant advantage in locales that they live and work around throughout the season while not restricting anyone who wishes to hunt." Over the past 5 years local residents in Unit 13 have harvested 21% of the total CSH harvest. Of the local Unit 13 resident harvest in the CSH hunt over the past 5 years, 52% of hunters used ATVs or ORVs for transportation and 2% of hunters used airplanes or boats. The remaining 46% of local harvest was achieved with highway vehicles for transportation, compared to only 16% of nonlocal harvest achieved with highway vehicle or otherwise nonmotorized transportation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on methods and means of this proposal and allocation for moose harvest. The Board would need to determine if the 8 criteria of the established customary and traditional use pattern in Unit 13 are provided for by the proposed registration hunt and the existing general season moose hunt in Unit 13 if the Board is to consider eliminating the CSH hunt. The Board will also have to determine if the new hunt structure and existing proxy regulations provide for the communal pattern of use that has been identified for moose in Unit 13, and whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting moose for subsistence uses. Depending on hunter effort and success with the new registration permit, overall levels of any-bull harvest in Unit 13 could decline with this new hunt structure; this hunt structure poses no conservation concerns and may alleviate the harvest pressure that has resulted in a decline in bull:cow ratios in most subunits. The Board also would have to determine if the CSH hunt would be eliminated for Unit 11, and if any changes would be necessary for the CSH hunt in Unit 12.

COST ANALYSIS: Adoption of this proposal is not expected to create additional cost to the department. The CSH hunt requires substantial administrative work compared to the proposed registration hunt.

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Proposals 47-50

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PROPOSAL 51 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Close a portion of sheep hunt in the Chitina River drainage in Unit 11 to nonresidents.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would eliminate all nonresident sheep hunting opportunity in Unit 11 north of the Chitina River, west of Canyon Creek, and south of Young Creek (MacColl Ridge). The proponent does not specify whether the resident-only hunt should be a draw hunt, registration hunt, or general season hunt, nor does it specify season dates or bag limits.

WHAT ARE THE CURRENT REGULATIONS? The current Dall sheep hunting regulations can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*. The Board has a positive customary and traditional use determination for Dall sheep in Unit 11 with an amount necessary for subsistence of 60–75 sheep.

Regulations allow for the take of Dall sheep in Unit 11 with general season harvest tickets. There is a youth hunt available to residents and nonresidents with season dates of August 1–August 5, with a full-curl bag limit for resident youth and a full-curl every 4 regulatory years for nonresident youth. The general season hunt is open to all residents and nonresidents with season dates of August 10–September 20 and a bag limit of 1 full-curl or larger ram for residents and full-curl or larger ram every 4 regulatory years for nonresidents. Nonresidents must be accompanied by a registered guide or a resident relative within second-degree of kindred. Harvested rams must be sealed within 30 days of kill.

Federal subsistence hunting regulations allow for federally qualified rural residents to take any ram on National Park Service lands in Unit 11 using a state general season harvest ticket with season dates of August 10–September 20, and rams must be sealed within 30 days of kill. Federal regulations also allow for the take of any sheep on National Park Service lands in Unit 11 with a federal permit available to federally qualified rural residents 60 years of age or older, or to a minor-elder joint pair, with season dates of August 1–October 20 and no sealing requirements.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would eliminate nonresident opportunity to harvest Dall sheep on MacColl Ridge in Unit 11, but clarification is necessary to determine the type of hunt, season dates, and bag limit for the resident-only hunt that would be established. The new resident-only hunt would likely draw significant levels of interest and competition to MacColl Ridge if administered as a registration or general season hunt because of the attention it will create by being addressed separately in regulation. As a result, harvest on MacColl Ridge is likely to increase slightly and this may impact the trophy potential for that area. Additional language may be necessary to clarify the boundaries of the hunt area, as Young Creek does not flow into the Chitina River (Figure 51-1).

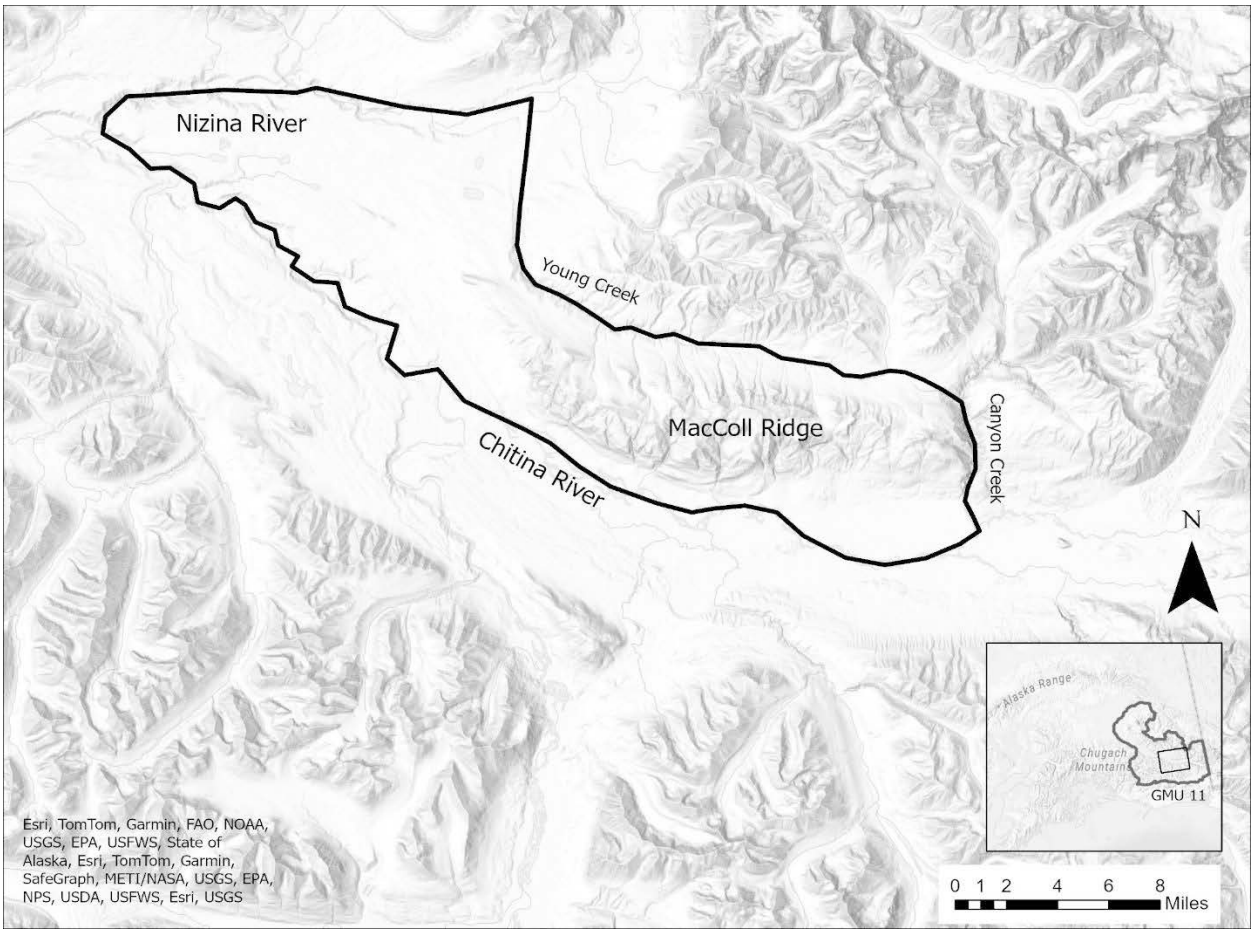

Figure 51-1. Approximation of proposed MacColl Ridge Management Area, Unit 11.

BACKGROUND: MacColl Ridge is located within Wrangell St. Elias National Preserve along the Chitina River in Unit 11 where state hunting regulations apply for residents and nonresidents, and federal subsistence hunting regulations apply for federally qualified subsistence users.

MacColl Ridge is roughly 15 miles long, although the proposed management area would be larger as the boundaries include non-sheep habitat assuming that "south of the Nizina river" is added to the description to close the northern boundary between Young Creek and the Chitina River. The majority of the area is National Park Service lands, although a backcountry lodge is situated on private lands at the base of MacColl Ridge, across from Bear Island. MacColl Ridge can only be reasonably accessed by airplane or boat.

The proponent expresses that the purpose of the new resident-only hunt would be to provide an area in which residents have the opportunity to hunt without the added competition and pressure from guided nonresidents, especially given the recent decline in sheep populations across the state.

Recent history of hunting pressure and harvest on MacColl Ridge suggests that the new resident-only hunt would reallocate harvest opportunity from nonresident guided hunters to resident hunters, and additional rams may be taken with increased hunting pressure (Table 51-1). While a

recent minimum count survey of MacColl Ridge suggests that current numbers are below historic highs, the total number of adults observed in 2023 suggests that the decline in numbers has not been as drastic on MacColl Ridge as declines observed in other parts of the state, and significant harvest opportunity is available under the full-curl harvest strategy (Table 51-1).

Table 51-1. Resident and nonresident hunters and harvest on MacColl Ridge, RY10–23.

Year	Resident Hunters	Res Success Rate	Nonresident Hunters	Nonres Success Rate	Total Harvest	% of total Harvest by Res	Full-curl rams observed during aerial surveys
2010	1	100%	5	80%	5	20%	4
2011	5	20%	6	100%	7	14%	-
2012	3	0%	1	100%	1	0%	-
2013	1	0%	3	100%	3	0%	-
2014	1	0%	3	100%	3	0%	-
2015	5	0%	2	50%	1	0%	-
2016	2	0%	2	100%	2	0%	-
2017	2	0%	4	100%	4	0%	-
2018	0	-	3	100%	3	0%	-
2019	0	-	2	100%	2	0%	-
2020	3	67%	2	50%	3	67%	-
2021	1	0%	2	100%	2	0%	-
2022	2	0%	6	67%	4	0%	-
2023	1	100%	3	100%	4	25%	8

Table 51-2. Resident and nonresident hunters and harvest in Unit 11, RY10–23

Year	Resident Hunters	Resident Success Rate	Nonresident Hunters	Nonres. Success Rate	Total Harvest	% of total Harvest by Res
2010	124	31%	19	53%	49	80%
2011	127	30%	13	77%	48	79%
2012	118	24%	13	54%	35	80%
2013	107	26%	18	94%	45	62%
2014	116	31%	19	74%	50	72%
2015	128	33%	21	38%	50	84%
2016	123	36%	12	83%	54	81%
2017	134	26%	21	81%	52	67%
2018	139	37%	20	90%	69	74%
2019	145	39%	19	84%	73	78%
2020	174	28%	19	58%	60	82%
2021	144	29%	13	77%	52	81%
2022	144	26%	22	50%	48	77%
2023	135	20%	13	54%	34	79%

Hunting pressure and harvest on MacColl Ridge is not reflective of the overall situation in Unit 11, where hunting opportunity in Wrangell St. Elias National Preserve is open to residents and nonresidents, but hunting opportunity in Wrangell St. Elias National Park is open to local federally qualified residents only. In Unit 11 as a whole, resident hunting pressure and success is higher than on MacColl Ridge (Table 51-2). The amount necessary for subsistence is generally not reached by actual harvest, but additional harvestable surplus is available annually. Significant general season opportunity is available for all Alaska residents and nonresidents is restricted to one full-curl ram every four years. Nonresident harvest in Unit 11 averages 12 rams annually (RY10–23).

DEPARTMENT COMMENTS: The Department is **NEUTRAL** on the allocation of Dall sheep opportunity and harvest. If this proposal is adopted it would require modification of the hunt area boundary description to define a complete boundary. Adoption of this proposal would also require specification of season dates, a bag limit, and hunt type for the resident-only hunt. A registration permit or general season hunt for MacColl Ridge with no nonresident hunting competition would attract significant interest and a drawing permit would be more appropriate for such a small area.

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

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PROPOSAL 52 – 5 AAC 92.530. Management Areas and 85.055. Hunting seasons and bag limits for Dall sheep. Establish a management area around MacColl Ridge with a resident only registration hunt for Dall sheep.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would establish a new MacColl Ridge Management Area (the area of Unit 11 north of the Chitina River, west of Canyon Creek, and south of Young Creek). This proposal would also establish a new registration permit hunt for Dall sheep within this management area, which would be available to residents only with season dates of August 10–September 20 and full-curl bag limit.

WHAT ARE THE CURRENT REGULATIONS? The current Dall sheep hunting regulations can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*. The Board has a positive customary and traditional use determination for Dall sheep in Unit 11 with an amount necessary for subsistence of 60–75 sheep.

Regulations allow for the take of Dall sheep in Unit 11 with general season harvest tickets. There is a youth hunt available to residents and nonresidents with season dates of August 1–August 5, with a full-curl bag limit for resident youth and a full-curl every 4 regulatory years for nonresident youth. The general season hunt is open to all residents and nonresidents with season dates of August 10–September 20 and a bag limit of 1 full-curl or larger ram for residents and full-curl or

larger ram every 4 regulatory years for nonresidents. Nonresidents must be accompanied by a registered guide, or resident relative within second-degree of kindred. Harvested rams must be sealed within 30 days of kill.

Federal subsistence hunting regulations allow for federally qualified rural residents to take any ram on National Park Service lands in Unit 11 using a state general season harvest ticket with season dates of August 10–September 20, and rams must be sealed within 30 days of kill. Federal regulations also allow for the take of any sheep on National Park Service lands in Unit 11 with a federal permit available to federally qualified rural residents 60 years of age or older, or to a minor-elder joint pair, with season dates of August 1–October 20 and no sealing requirements.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would eliminate nonresident opportunity to harvest Dall sheep on MacColl Ridge in Unit 11. The new resident-only registration permit would likely draw significant levels of interest and competition to the new MacColl Ridge Management Area. As a result, harvest on MacColl Ridge is likely to increase slightly because of the attention it will create by being addressed separately in regulation and this may impact the trophy potential for that area. Additional language may be necessary to clarify the boundaries of the new Management Area, as Young Creek does not flow into the Chitina River (Figure 52-1).

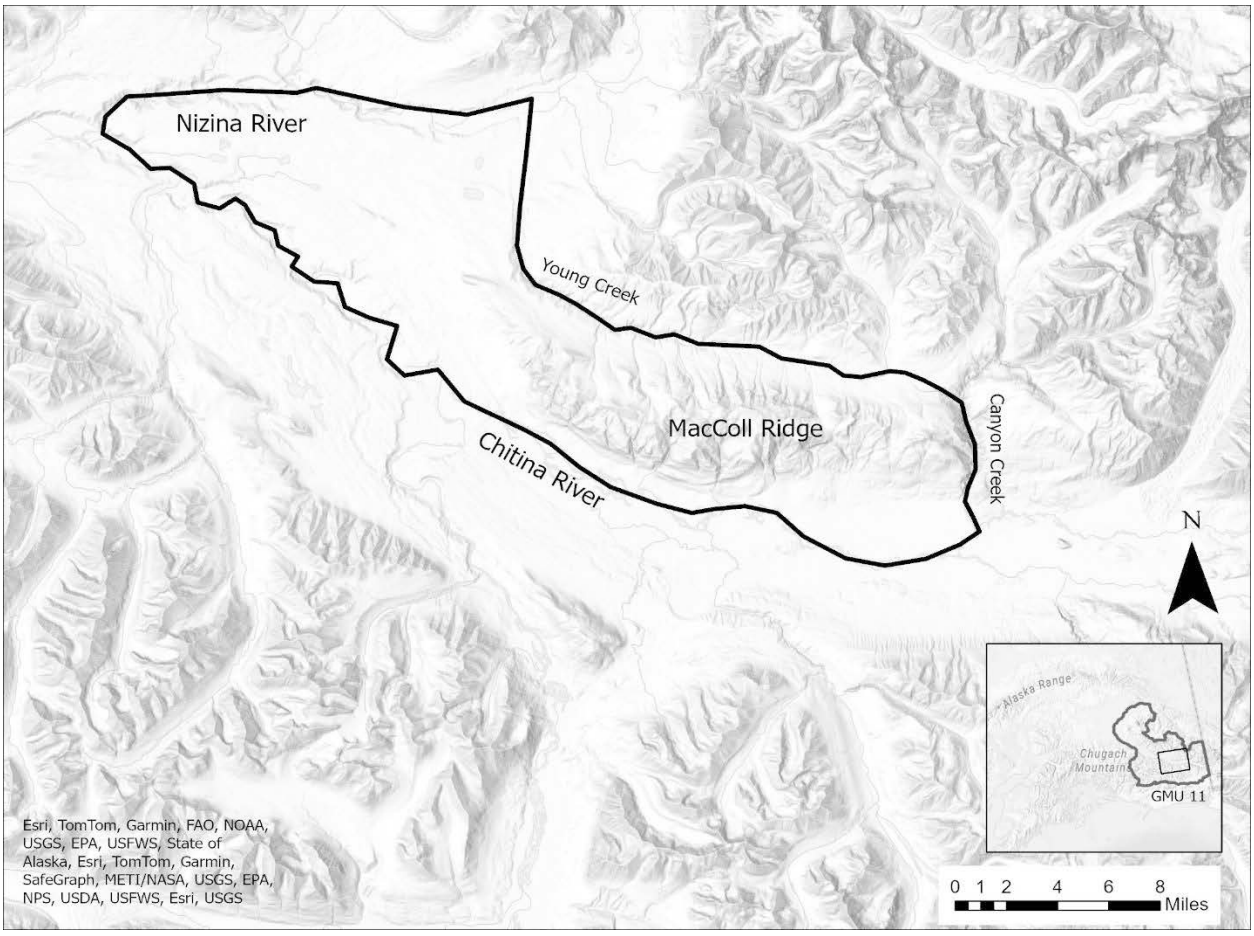

Figure 52-1. Approximation of proposed MacColl Ridge Management Area, Unit 11.

BACKGROUND: MacColl Ridge is located within Wrangell St. Elias National Preserve along the Chitina River in Unit 11 where state hunting regulations apply for residents and nonresidents, and federal subsistence hunting regulations apply for federally qualified subsistence users.

MacColl Ridge is roughly 15 miles long, although the proposed management area would be larger as the boundaries include non-sheep habitat assuming that "south of the Nizina river" is added to the description to close the northern boundary between Young Creek and the Chitina River. The majority of the area is National Park Service lands, although a backcountry lodge is situated on private lands at the base of MacColl Ridge, across from Bear Island. MacColl Ridge can only be reasonably accessed by airplane or boat.

The proponent expresses that the purpose of the new MacColl Ridge Management Area would be to designate an area to give opportunity and preference to resident sheep hunters to hunt without the added competition and pressure from guided nonresidents, especially given the recent decline in sheep populations across the state.

Recent history of hunting pressure and harvest on MacColl Ridge suggests that the new Management Area and associated registration hunt would reallocate harvest opportunity from nonresident guided hunters to resident hunters, and additional rams may be taken with increased hunting pressure (Table 52-1). While a recent minimum count survey of MacColl Ridge suggests that current numbers are below historic highs, the total number of adults observed in 2023 suggests that the decline in numbers has not been as drastic on MacColl Ridge as declines observed in other parts of the state, and significant harvest opportunity is available under the full-curl harvest strategy (Table 52-1).

Table 52-1. Resident and nonresident hunters and harvest on MacColl Ridge, RY10–23.

Year	Resident Hunters	Res Success Rate	Nonresident Hunters	Nonres Success Rate	Total Harvest	% of total Harvest by Res	Full-curl rams observed during aerial surveys
2010	1	100%	5	80%	5	20%	4
2011	5	20%	6	100%	7	14%	-
2012	3	0%	1	100%	1	0%	-
2013	1	0%	3	100%	3	0%	-
2014	1	0%	3	100%	3	0%	-
2015	5	0%	2	50%	1	0%	-
2016	2	0%	2	100%	2	0%	-
2017	2	0%	4	100%	4	0%	-
2018	0	-	3	100%	3	0%	-
2019	0	-	2	100%	2	0%	-
2020	3	67%	2	50%	3	67%	-
2021	1	0%	2	100%	2	0%	-

2022	2	0%	6	67%	4	0%	-
2023	1	100%	3	100%	4	25%	8

Table 52-2. Resident and nonresident hunters and harvest in Unit 11, RY10–23

Year	Resident Hunters	Res. Success Rate	Nonresident Hunters	Nonres. Success Rate	Total Harvest	% of total Harvest by Res
2010	124	31%	19	53%	49	80%
2011	127	30%	13	77%	48	79%
2012	118	24%	13	54%	35	80%
2013	107	26%	18	94%	45	62%
2014	116	31%	19	74%	50	72%
2015	128	33%	21	38%	50	84%
2016	123	36%	12	83%	54	81%
2017	134	26%	21	81%	52	67%
2018	139	37%	20	90%	69	74%
2019	145	39%	19	84%	73	78%
2020	174	28%	19	58%	60	82%
2021	144	29%	13	77%	52	81%
2022	144	26%	22	50%	48	77%
2023	135	20%	13	54%	34	79%

Hunting pressure and harvest on MacColl Ridge is not reflective of the overall situation in Unit 11, where hunting opportunity in Wrangell St. Elias National Preserve is open to residents and nonresidents, but hunting opportunity in Wrangell St. Elias National Park is open to local federally qualified residents only. In Unit 11 as a whole, resident hunting pressure and success is higher than on MacColl Ridge (Table 52-2). The amount necessary for subsistence is generally not reached by actual harvest, and additional harvestable surplus is available annually. Significant general season opportunity, available for all Alaska residents and nonresidents, are restricted to one full-curl ram every four years. Nonresident harvest in Unit 11 averages 12 rams annually (RY10–23).

DEPARTMENT COMMENTS: The Department is **NEUTRAL** on the allocation of Dall sheep opportunity and harvest. If this proposal is adopted it will require modification of the Management Area boundary description to define a complete boundary. This proposal maintains a full-curl harvest strategy, which prevents overharvest, but a resident-only registration permit for MacColl Ridge with no nonresident hunting competition would attract significant interest and a drawing permit would be more appropriate for such a small area.

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

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PROPOSAL 53 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep Establish a late-season archery-only Dall sheep drawing hunt for residents in Unit 13D.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would establish a new 15-day, full-curl draw sheep hunt opportunity for residents in Unit 13D west of the Richardson Highway with season dates of October 1–15.

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

Unit 13D east of a line along the west side of Tazlina Glacier, Tazlina Lake, and Mendeltna Creek to the Richardson Highway (up to 130 permits may be issued):

Resident hunters: 1 ram with full-curl horn or larger by drawing permit only, August 10–September 20 (DS165).

Nonresident hunters: 1 ram with full-curl horn or larger every 4 regulatory years by drawing permit only, August 10–September 20 (DS265).

Unit 13D west of a line along the west side of Tazlina Glacier, the west side of Tazlina Lake, and the west bank of Mendeltna Creek (up to 50 permits may be issued):

Resident hunters: 1 ram by drawing permit only, August 10–September 20 (DS160).

Nonresident hunters: 1 ram every 4 regulatory years by drawing permit only, August 10–September 20 (DS260 or DS060).

Nonresident hunters must be accompanied by a guide or relative within the second degree of kindred.

In Unit 13D the department shall issue a maximum of 20 percent of the drawing permits to nonresidents and a minimum of 80 percent of the drawing permits to residents, and 20 percent of the nonresident permits are allocated to nonresidents hunting with resident relatives within the second degree of kindred. Harvested rams must be sealed within 30 days of kill.

There is a negative customary and traditional use (C&T) finding for Dall sheep in Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal would create an additional 15 days of hunting opportunity for residents who choose to apply for and are drawn for an archery-only draw permit with a full-curl bag limit and season dates of October 1–15, with a hunt area in Unit 13D west of the Richardson Highway. This would provide additional hunting opportunity in an area where the majority of accessible full-curl rams are likely harvested during the existing draw hunt seasons and weather in the area during the

October season dates will present difficult access and substantial sheep hunting challenges, so chances of success during this new October season would be low. This additional draw hunt opportunity is not likely to increase harvest significantly for the area. The number of resident permits issued for this late season would impact the number of nonresident permits available to be issued for the early season if the number of permits issued to residents in the early season was not reduced, because of the allocations found in 5 AAC 92.057.

BACKGROUND: The Board of Game established resident and nonresident draw hunts for sheep in Unit 13D west of the Richardson Highway in 2007, effective for RY2008, with 2 distinct hunt areas represented by DS165/265 (East) and DS160/260 (West) (Figure 53-1). Both areas have season dates of August 10–September 20.

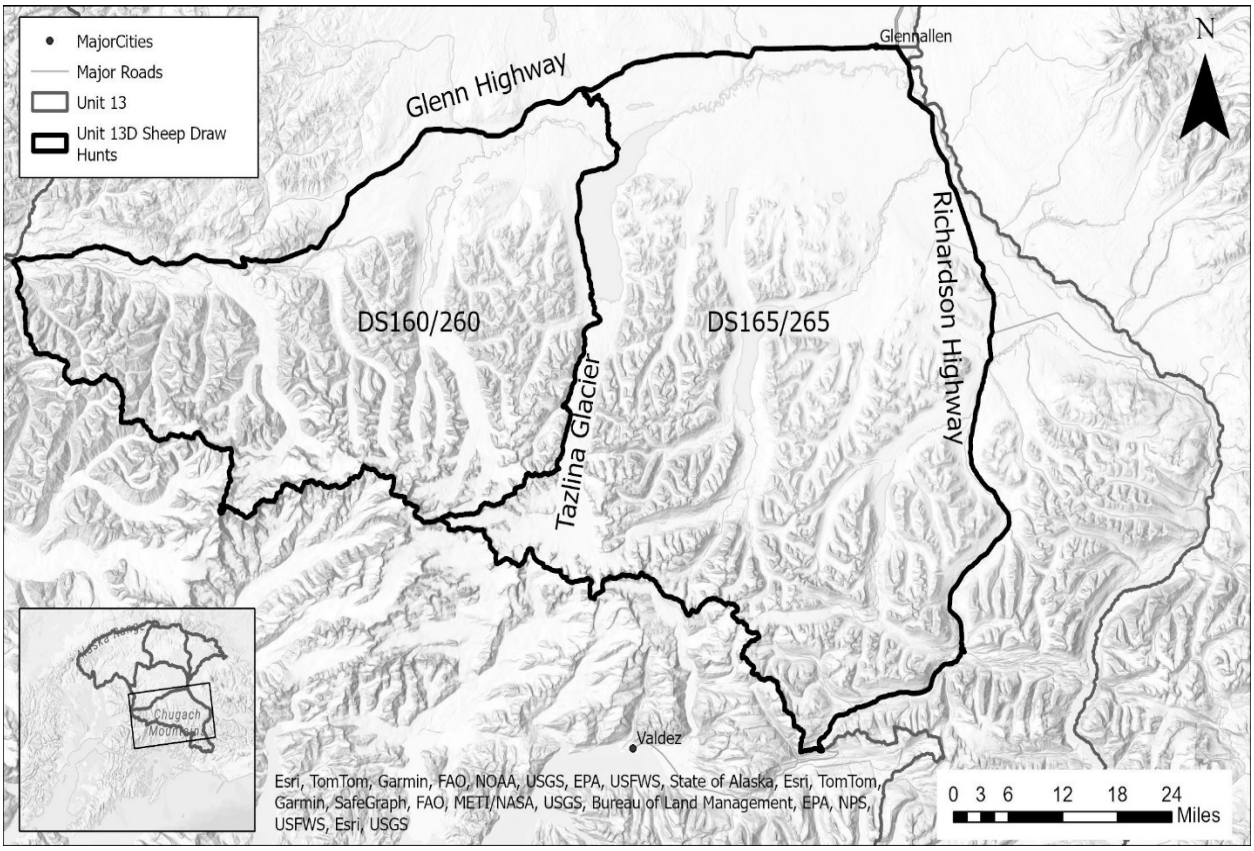

Figure 53-1. Hunt map for DS160/260 and DS165/265 in Unit 13D.

This proposal would combine the DS160/260 and DS165/265 area to create an additional late-season archery-only resident-only harvest opportunity. In the history of harvest reporting for Dall sheep in Unit 13D, only 1 ram has been reported as harvested with a bow, and that harvest occurred in 2011. The current draw hunt structure already limits competition for those hunters interested in hunting in Unit 13D, regardless of whether they choose to hunt with archery equipment or firearms.

The full-curl bag limit would prevent overharvest of sheep in Unit 13D with this additional harvest opportunity, but other factors would limit hunt success as well. Much of Unit 13D is difficult to

access, and weather conditions in early October would compound that difficulty, especially in the high country as snow accumulates. Some sheep may come down to lower elevations in early October, but finding full-curl rams after harvest has occurred in the August/September draw hunt would be difficult.

In addition, archers hunting during this period would not be subject to the same aircraft restrictions imposed on hunters during the general harvest sheep season which might improve chances for success. Under the current regulations hunters may not use aircraft to locate sheep or direct hunters to sheep during the time period of August 10 to September 20. There is a proposal to be considered at this Board of Game meeting to extend the ban on aerial spotting of sheep into October to cover this proposed additional hunting season and remove that potential advantage.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the methods and means of this proposal. Maintaining full-curl bag limits for Dall sheep will prevent overharvest if hunters abide by the full-curl regulations, and the additional opportunity presented by this proposal offers very little chance of hunter success.

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

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PROPOSAL 54 - 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Change the bag limit for the Unit 13D sheep drawing hunts, DS060, DS160, and DS260

PROPOSED BY: Herb Mansavage and Dan Montgomery

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit for the Dall sheep draw hunts west of a line along the west side of the Tazlina Glacier, Tazlina Lake, and Mendeltna Creek (DS060/160/260) from 1 ram to 1 ram with a full-curl horn or larger, 8 years old, or 2 broken tips.

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

Unit 13D east of the Richardson Highway may do so under the following seasons and bag limits:

Resident hunters: 1 ram with full-curl horn or larger by general season harvest ticket, August 10–September 20. Youth hunters have additional season dates of August 1–5.

Nonresident hunters: 1 ram with full-curl horn or larger every 4 regulatory years by general season harvest ticket, August 10–September 20. Youth hunters have additional season dates of August 1–5.

Hunters who wish to hunt Dall sheep in Unit 13D west of a line along the west side of Tazlina Glacier, the west side of Tazlina Lake, and the west bank of Mendeltna Creek (up to 50 permits may be issued):

Resident hunters: 1 ram by drawing permit only, August 10–September 20 (DS160).

Nonresident hunters: 1 ram every 4 regulatory years by drawing permit only, August 10–September 20 (DS260 or DS060).

Nonresident hunters must be accompanied by a guide or relative within the second degree of kindred.

In Unit 13D the department shall issue a maximum of 20 percent of the drawing permits to nonresidents and a minimum of 80 percent of the drawing permits to residents, and 20 percent of the nonresident permits are allocated to nonresidents hunting with resident relatives within the second degree of kindred. Harvested rams must be sealed within 30 days of kill.

There is a negative customary and traditional use (C&T) finding for Dall sheep in Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal would align the bag limit for the DS060/160/260 hunt area with the DS165/265 hunt area. This would eliminate the any-ram harvest opportunity and replace it with the standard full-curl harvest strategy in an area where mature rams do not always grow horns that complete a full-curl. This could result in a decrease in hunting opportunity if this area remains a drawing hunt, as permit numbers would be based off of the minimum number of full-curl rams observed during surveys, rather than the ram-to-ewe ratio currently used to determine permit numbers.

BACKGROUND: The Board of Game established resident and nonresident draw hunts for sheep in 13D west of the Richardson Highway in 2007, effective beginning RY2008, with two distinct hunt areas represented by DS165/265 (East) and DS160/260 (West) (Figure 54-1). Both areas have season dates of August 10–September 20.

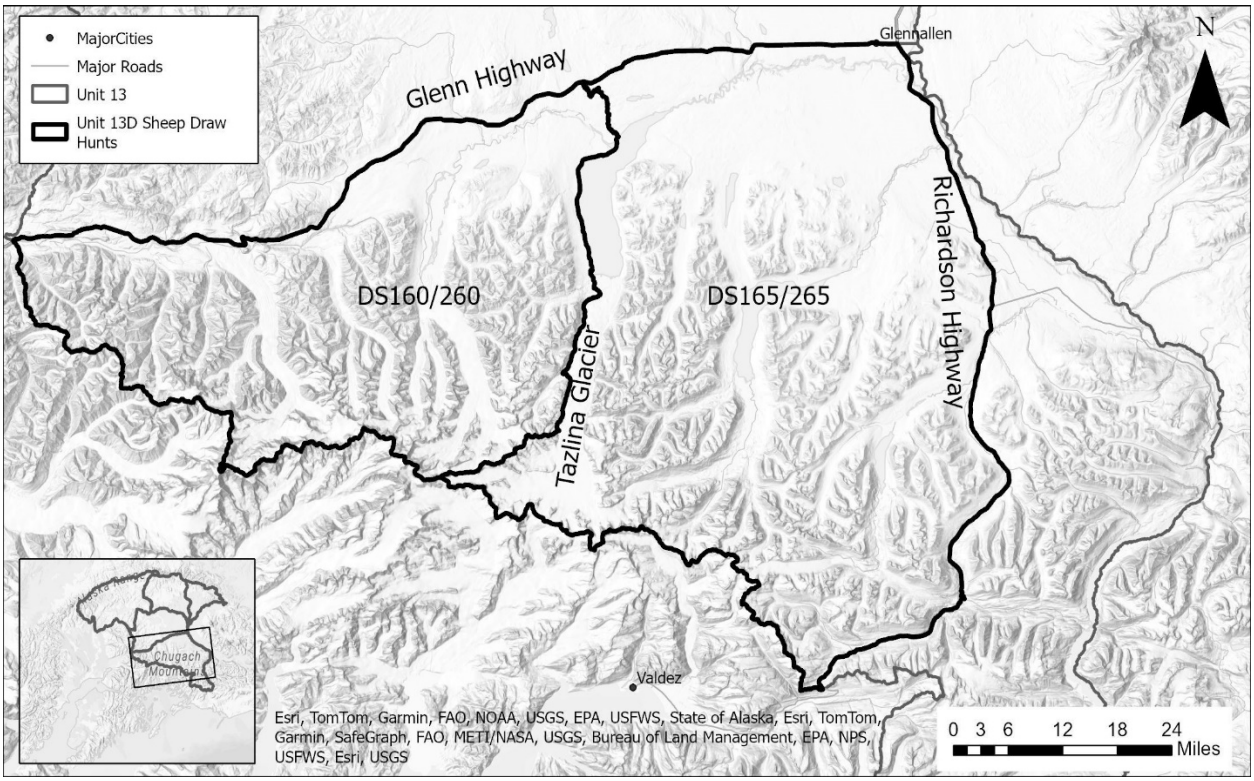

Figure 54-1. Hunt map for DS160/260 and DS165/265 in Unit 13D.

The DS160/260 hunt area was established as an any-ram hunt area to allow the take of less than full-curl rams without confirming age, as rams were understood to be growing old in this area without reaching full-curl. Hunters expressed concern about shooting rams based on age, which is a practice that is generally discouraged by the department. The DS160/260 hunt area was established as a unique hunt opportunity to allow the take of rams without the pressure of determining age or full-curl status, with the expectation that most hunters would still prefer to harvest a mature ram. As such, permit numbers for this draw hunt area are based on minimum count sheep surveys conducted every other year, with the goal of maintaining a biologically adequate ram-to-ewe ratio after the hunt, which is a conservative approach to protect the biological viability of the population. This unique any-ram harvest opportunity is the third most popular draw sheep hunt in the state. For RY2023 permits, DS160 received 3,702 applications for 15 permits, DS260 received 810 applications for 2 permits, and DS060 received 406 applications for one permit.

The current management strategy of the DS160/260 any-ram draw area can be compared with the management strategy of the neighboring DS165/265 full-curl draw area to assess the performance of the current any-ram hunt management. Overall harvest in both areas declined after the implementation of draw permits, but hunt success in the DS160/260 any-ram hunt area is comparable to or higher than that observed in the DS165/265 hunt area, with less rams harvested on average because less permits are typically issued for the DS160/260 hunt area (Figure 54-2).

The average age of rams harvested in the DS160/260 any-ram hunt area is generally comparable to the average age of rams harvested in the DS165/265 hunt area (Figure 54-3).

The proponents state that the intention of this proposal is to cease the harvest of juvenile, non-breeding rams in the DS160/260/060 hunt area. Figure 54-4 demonstrates the number of juvenile non-breeding rams harvested throughout the history of this hunt, in comparison to the minimum number of rams observed in the hunt area during summer sheep surveys.

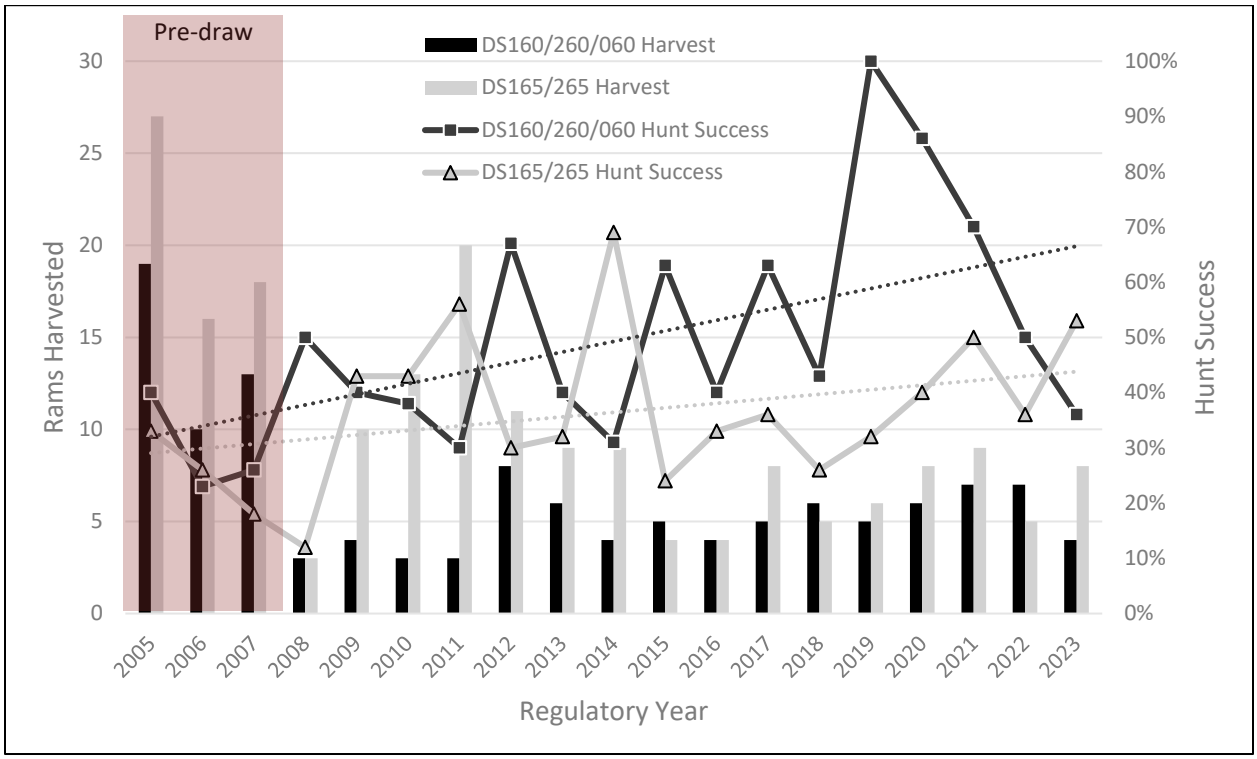

Figure 54-2. Harvest and hunter success rates in Unit 13D draw hunt areas, RY2005–2023.

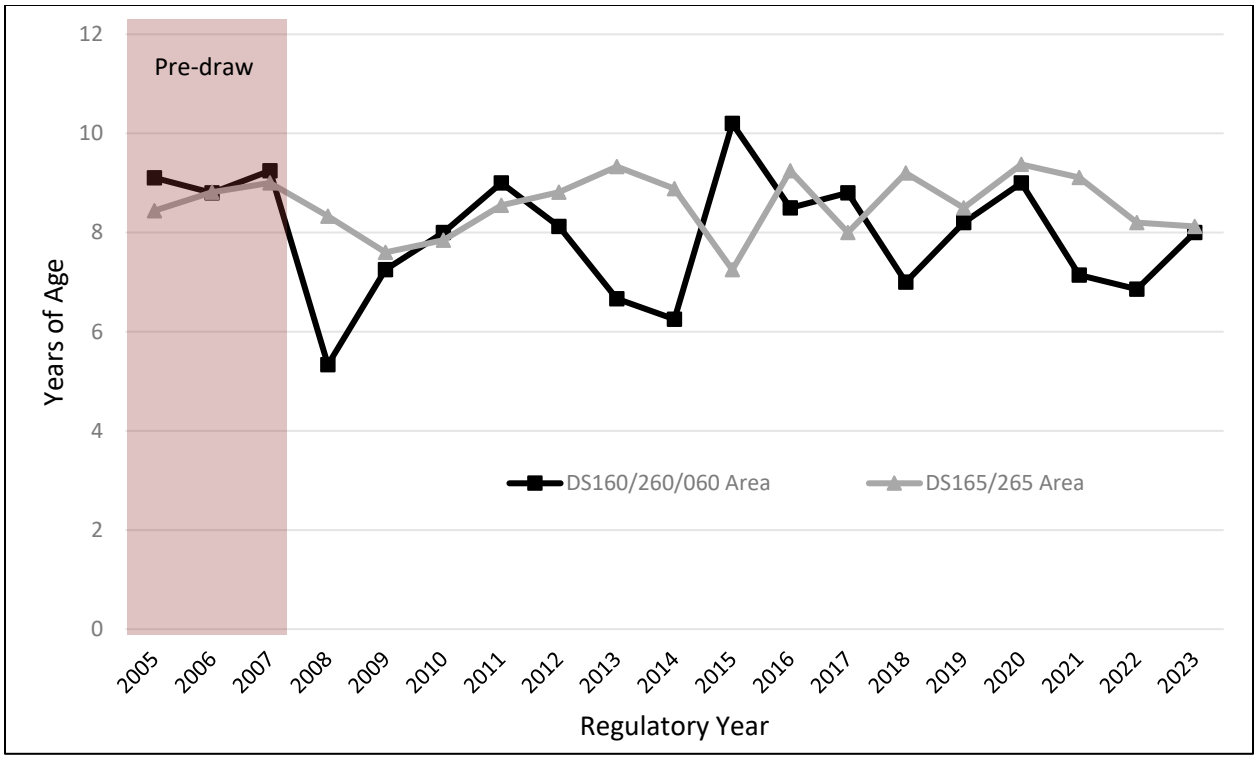

Figure 54-3. Average age of rams harvested in Unit 13D draw hunt areas, RY2005–2023.

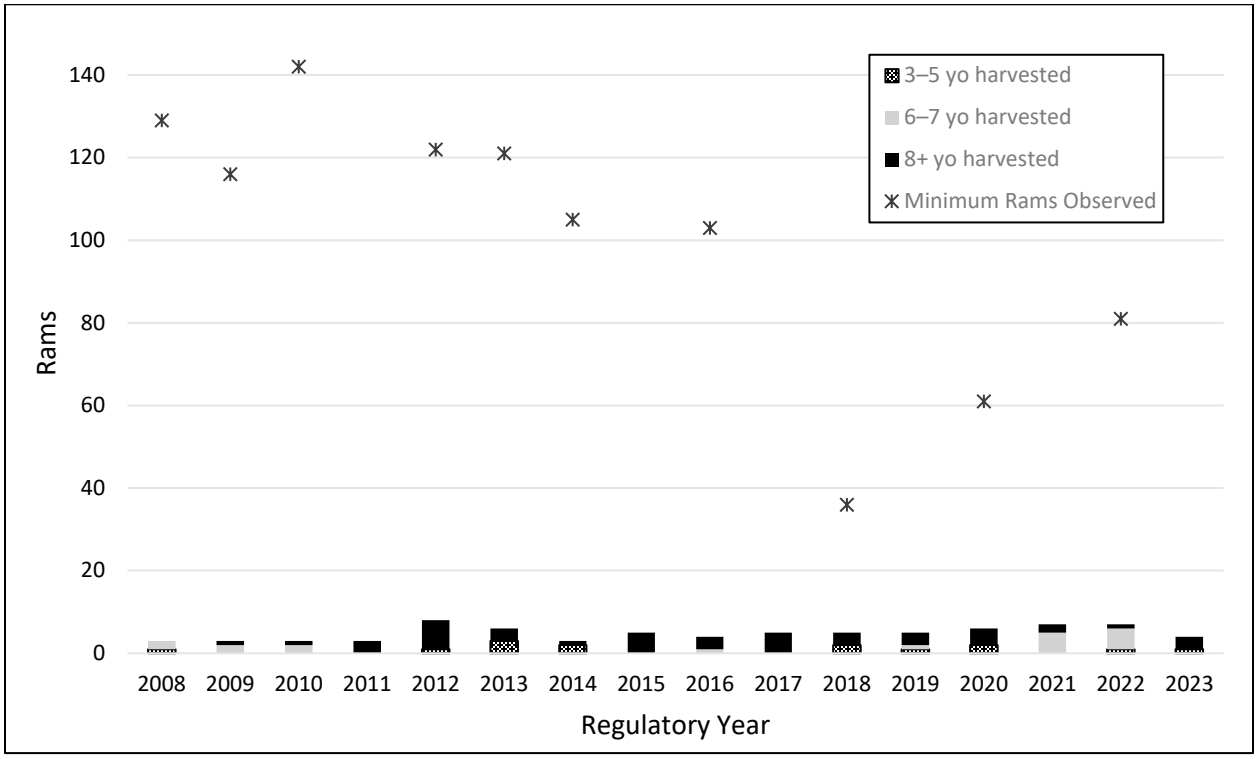

Figure 54-4. Minimum rams observed and age class of rams harvested in DS160/260/060 hunt area, RY2008–2023.

The DS160/260/060 hunt area maintains a high ram-to-ewe ratio, but the proportion of rams deemed to be full-curl in minimum count surveys is consistently lower in the DS160/260/060 area than it is in the DS165/265 area, consistent with the understanding that rams in the DS160/260/060 area do not always reach full-curl as they mature (Figures 54-5 and 54-6). Harvest data support this understanding, as some rams harvested in the area are 9 or 10 years old, but only reach 3/4–7/8 curl, and it is not uncommon for rams 8 years or older to be less than full curl, with some 8-year-olds reaching less than ¾ curl (Figure 54-7).

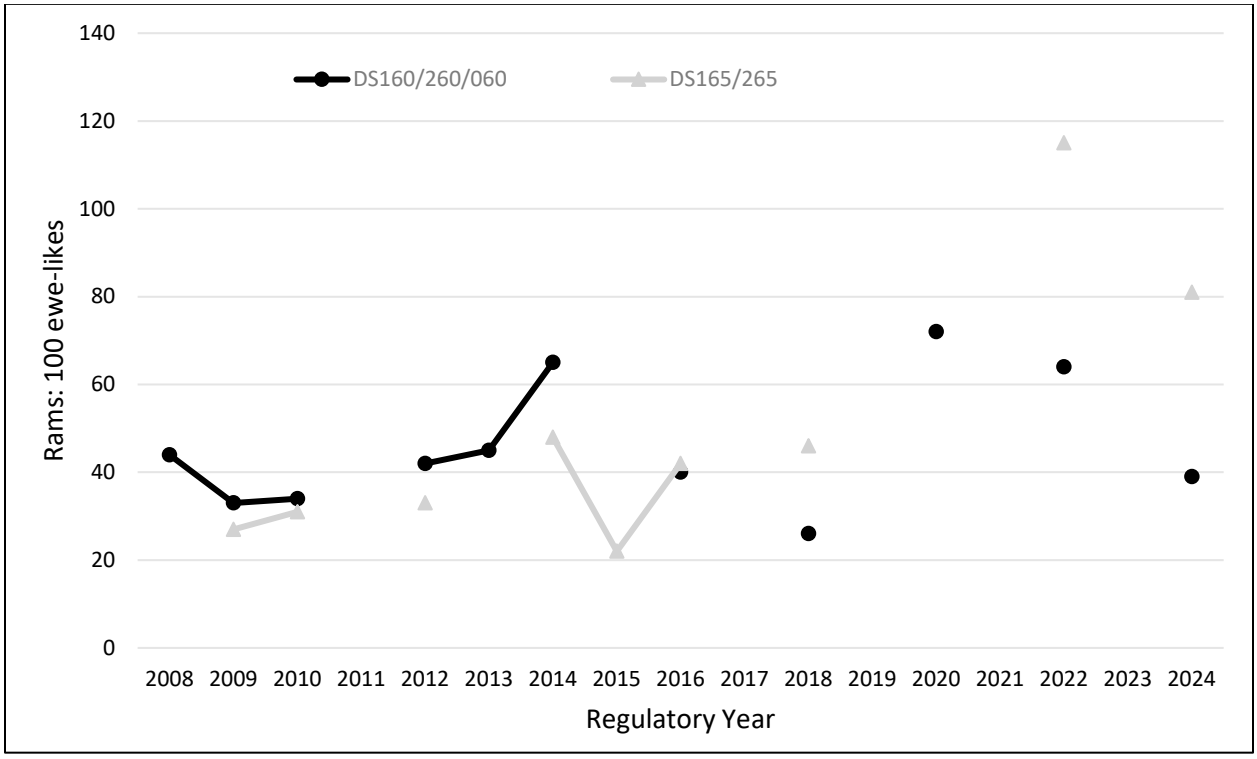

Figure 54-5. Ram-to-ewe-like ratios observed during minimum count sheep surveys in Unit 13D draw hunt areas, RY2008–2024.

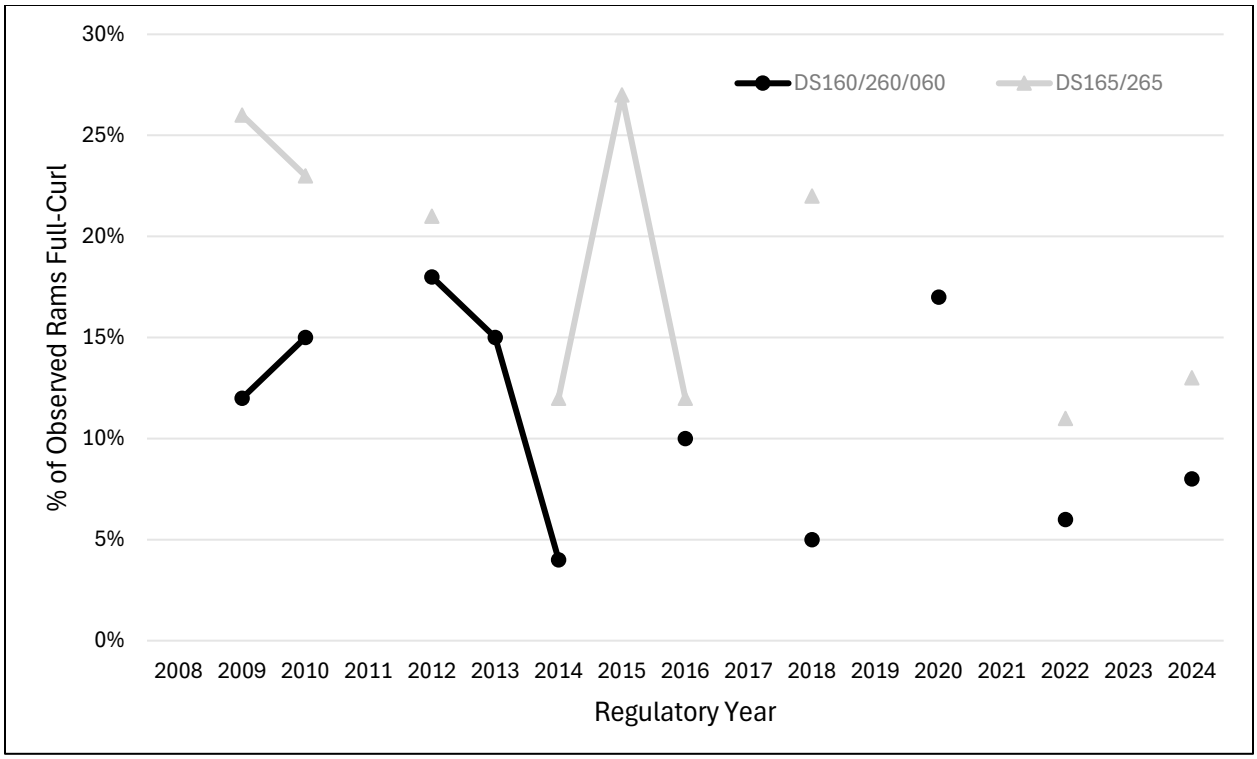

Figure 54-6. Percentage of rams observed in minimum count surveys that appear to reach full curl in Unit 13 D draw hunt areas, RY2008–2024.

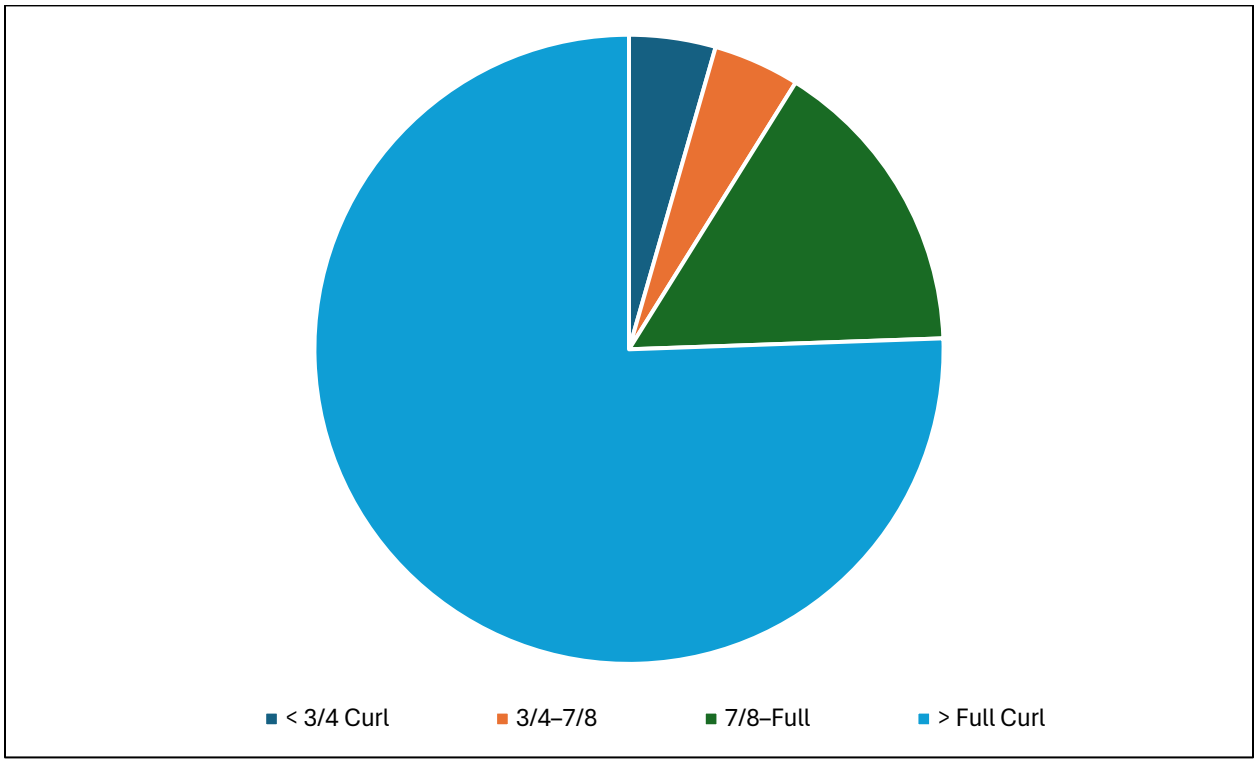

Figure 54-7. Curl class for rams harvested in DS160/260/060 that are 8 years of age or older, n=45, RY2008–2023.

If this proposal were adopted and the intention is still to provide high hunt quality with limited competition and high chance of success, then permit numbers would be based on minimum full-curl rams observed during July surveys every other year, similar to how permit numbers are currently derived for the DS165/265 hunt area, rather than the ram-to-ewe ratio that is currently used to determine permit numbers in the DS160/260 hunt area. This could result in a decrease in permit numbers if this area remains a draw permit with the current management objectives, as the DS060/160/260 hunt area has proportionally less full-curl rams typically seen in surveys.

The DS060/160/260 hunt area was established to allow the take of mature rams without the pressure of judging age in the field, as not all mature rams are reaching full-curl. Harvest data show that the intention of this hunt area is being achieved, as the majority of rams harvested are mature rams and the harvest of rams in this hunt area does not appear to be biologically detrimental when population performance is compared with nearby areas.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on management objectives for Dall sheep in the DS060/160/260 hunt area. Adoption of this proposal could result in a decrease in harvest because many rams in the area do not reach 360 degrees of curl even when 8 years old or older.

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

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Proposals 55-63

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PROPOSAL 64 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Reauthorize the antlerless moose draw permits in Units 14A and 14B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts must be re-authorized annually by the board to comply with statutory requirements.

WHAT ARE THE CURRENT REGULATIONS? Units 14A and 14B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations for Units 14A&B can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

- The department has the authority to issue up to 2,000 drawing permits to resident hunters in Unit 14A with a bag limit of one antlerless moose. The season is August 25–September 25 for DM400–DM410 and YM412, November 1–November 30 for DM413 and December 1–December 25 for DM414.
- The department may also issue up to 200 permits to resident hunters for the targeted hunt in Unit 14A with a bag limit of one moose during a winter season, which is to be announced by emergency order.

The department may also issue up to 100 additional permits to resident hunters for a targeted hunt in Unit 14B with a bag limit of one moose during a winter season, which is to be announced by emergency order.

Moose in Unit 14A have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,000–6,500 moose and 360–750, respectively. Moose in Unit 14B have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 2,500–2,800 moose and 100–200, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts are needed to keep the moose population within management objectives and provide additional hunting opportunity for residents. The targeted hunt also provides managers with a tool to reduce moose-vehicle collisions and address nuisance moose issues.

BACKGROUND: Moose surveys conducted in November of 2023 provided an estimate of 6,657 (±810; 80% CI) moose in Unit 14A. This is less than the 2020 population estimate of 7,112 however it is greater than the population objective of 6,000–6,500 moose. Twinning surveys conducted in the spring of 2024 showed a twinning rate of 28%, the highest since 2017: this is indicative of a population that should be managed for stability. The twinning rate has been increasing since 2021 which suggests that the population productivity is increasing as the population is being brought closer to the population objective.

The number of antlerless permits issued was raised in spring of 2011 from 400 to 1,000. Due to the heavy snows that same winter, there were no antlerless permits issued in 2012. Subsequent surveys indicated that the moose population was not adversely affected by the winter of 2011 and was continuing to grow. The department manages moose adaptively and the number of permits issued was raised to the limit of 1,000 permits for the fall of 2017. In spring of 2018 the board increased the permit levels to 2,000 permits and 1,302 permits were issued for RY18 and 1,310 in RY19. The antlerless permits were reduced to 800 in RY21 and RY22, 367 in RY23, and then reduced again to 199 in RY24. The success rate for hunters under the antlerless permits has remained steady at about 49% over the past 3 years.

The targeted moose hunt in Units 14A and 14B provides an additional tool to address public safety concerns related to moose-vehicle collision and nuisance management issues. The targeted hunt (AM415) has been in place since 2012. Under this permit, hunters are either designated a specific nuisance moose to take or are assigned one of four areas where a high number of moose–vehicle collisions are known to occur. In this scenario permits are issued as snow increases and moose become more prevalent along roadways. The winter of 2014 was very mild with almost no snow. As a result, only 20 permits were issued that year. No permits were issued in the winters of 2017–2023. For the years that permits were issued, on average 143 permits were issued, and 110 moose were taken, providing an average success rate of 77%.

The Unit 14A moose population has exceeded population objectives for the past 12 years and has the potential for large increases in a relatively short amount of time. These increases in density may increase in the number of moose-human conflicts, and moose may experience nutritional stress, particularly during severe winters. The number of antlerless moose harvested in recent years and the severity of the winter of last couple of years has arrested the growth of the herd and led to a population reduction. As a result, the department will continue to offer a reduced number of antlerless permits for RY25 and future permit levels will be adjusted as more current population information becomes available.

Browse surveys completed in the spring of 2016 demonstrated a removal rate of 37.13% (±6.9%; 95% CI). This offtake indicated a relatively high proportion of commonly browsed plants in the unit are being consumed annually, suggesting the moose population in Unit 14A may have approached their carrying capacity. Browse surveys were conducted at the end of a winter which had little snowfall and browsing appeared to be more evenly distributed than in what would be found in a typical year.

Moose-vehicle collisions result in property damage and may result in human injury or death. An average of approximately 300 moose per year were killed in the Mat-Su Valley area during the last 5 years of average snowfall and reliable reporting. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

The department uses the targeted hunts to mitigate public safety concerns by issuing permits to selected hunters and assigning them to hunt areas that correspond with areas of high moose-vehicle collisions or reoccurring nuisance issues.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Antlerless moose harvests are necessary to achieve and maintain the population within objectives and reduce moose-human conflicts in the Mat-Su Valley by providing significant additional moose hunting opportunity.

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

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PROPOSAL 65 - 5 AAC 85.045 Hunting seasons and bag limits for moose. Reduce the maximum number of permits able to be issued by the department. Break up Unit 14A winter antlerless hunts into separate hunt areas.

PROPOSED BY: Matanuska Valley Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would reduce the total number of antlerless moose permits that may be issued in Unit 14A from 2,000 permits to 1,000 permits. It would also change the hunt area for draw hunts DM413 and DM414 from all of 14A to match the hunt areas for the fall antlerless hunts.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations for Units 14A can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

- The department has the authority to issue up to 2,000 drawing permits to resident hunters in Unit 14A with a bag limit of 1 antlerless moose. The season is August 25–September 25 for DM400–DM410 and YM412, November 1–November 30 for DM413 and December 1–December 25 for DM414.
- The department may also issue up to 200 permits to resident hunters for the targeted registration hunt (AM415) in Unit 14A with a bag limit of 1 moose during a winter season to be announced by emergency order.

Moose in Unit 14A have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 6,000–6,500 moose and 360–750, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would reduce the cap on the number of antlerless moose permits that could be issued in Unit 14A from 2,000 permits to 1,000 permits. It would also break up the 2 winter hunts, DM413 and DM414, into 8 different hunt areas, matching the hunt areas for the fall hunts. Reducing the maximum allowable permits may limit the department's ability to respond to significant population increases and may result in a boom-bust population cycle. Fragmenting the winter hunts would ensure an even distribution of hunters in the winter but would also add a significant administrative burden to the department. Additionally permit allocation made a year prior to the hunt would not allow for hunters to shift effort to match seasonal movements of moose.

BACKGROUND: Moose surveys conducted in November of 2023 provided a population estimate of 6,657 (± 810; 80% CI) moose in Unit 14A (Figure 65-1). This is less than the 2020 population estimate of 7,112 however it is greater than the population objective of 6,000–6,500 moose. Twinning surveys conducted in the spring of 2024 showed a twinning rate of 28%, the highest since 2017. Twinning rate is an indicator of the health and productivity of a population, a population at or near carrying capacity that may be exceeding what the habitat can support will have a lower twinning rate (<20%). Populations are managed for high productivity, allowing for high sustained harvest. The twinning rate has been increasing since 2021 which suggests that the population productivity is increasing as the population is being brought closer to the objective.

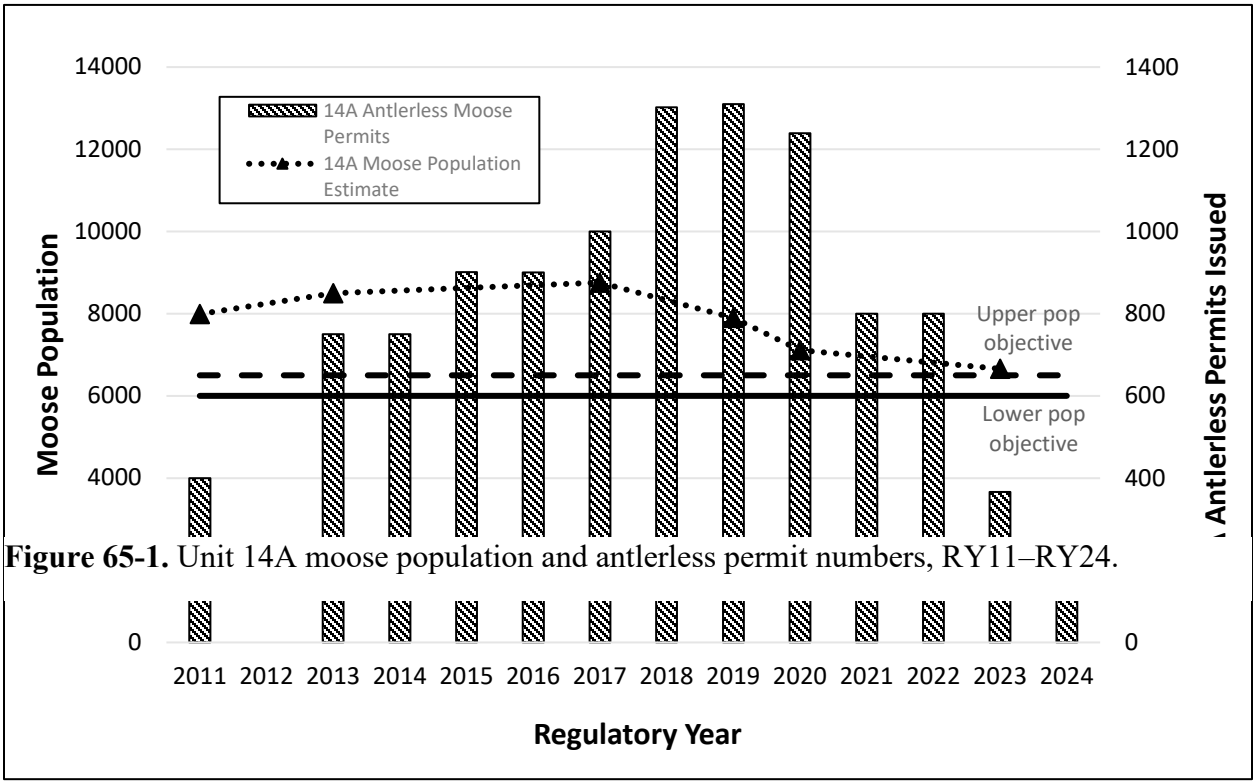

Figure 65-1. Unit 14A moose population and antlerless permit numbers, RY11–RY24.

The number of antlerless permits available was raised in spring of 2011 from 400 to 1,000 (Figure 65-1). Due to the heavy snows that same winter, there were no antlerless permits issued in 2012. Subsequent surveys indicated that the moose population was not adversely affected by the winter of 2011 and was continuing to grow. The number of permits available began to be increased eventually meeting the limit of 1,000 permits for the fall of 2017. In spring of 2018 the board increased the permit limit to 2,000 permits and 1,302 permits were issued for RY18 and 1,310 in RY19. The antlerless permits were reduced to 800 in RY21 and RY22, 367 in RY23, and then reduced again to 199 in RY24 as the population was reduced and approached the upper end of the population objective. The success rate for hunters under the antlerless permits has remained steady at about 49% over the past 3 years independent of the number of permits issued. DM401 has the lowest success rate at an average of 25%, largely due to limited access, while the winter moose hunts, DM413 and DM414 have the highest average success rates at 75%.

The winter antlerless hunts, DM413 and DM414, are one of the most effective tools for reducing the moose population. Held during the months of November and December, spanning the entirety of Unit 14A, there is occasionally the public perception that all hunter effort is focused on 1 or 2 specific areas. Over the last 5 years (RY19–RY23), hunters have spread themselves across the unit primarily based on the location of their personal residency, their perception of local moose densities, or available hunter access (Table 65-1). Hunters will occasionally contact the department for recommendations on where to hunt and are typically referred to areas in the unit where there has been higher recent nuisance wildlife reports or higher moose-vehicle collisions.

Table 65-1. Harvest locations in antlerless hunts DM413 and DM414, RY19–RY23.

Location	RY19	RY20	RY21	RY22	RY23	Total	% of Total
Willow/Zero Lake/Bald Ridge	37	39	19	25	4	124	15%
Big Lake/Houston	66	73	34	36	13	222	26%
Pt. Mac/KGB	43	73	19	29	3	167	20%
Knik/Butte	21	33	27	24	7	112	13%
Sutton/Chickaloon	35	26	10	11	3	85	10%
Palmer Hay Flats	30	11	12	6	4	63	7%
Palmer/Wasilla	17	27	17	4	7	72	9%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on decreasing the maximum number of permits able to be issued. The department adaptively manages moose populations, and with the current population estimate, the department does not anticipate issuing more than 1,000 permits in the near future. However, if populations were to rise significantly above objective as occurred in 2013–2017, a higher maximum number of permits will be necessary to control growth and reduce the population.

The department is **OPPOSED** to breaking up the winter hunt areas as this would unnecessarily cause a substantial increase in administrative burden. Fragmenting the hunt areas for DM413 and DM414 would address a perception of overuse in certain areas and may result in a temporary localized depletions. However, hunters typically disperse throughout the unit with areas of higher moose density typically receiving higher hunter pressure. Moose are generally well distributed throughout the unit in the fall. During winter as snow builds up at higher elevations moose begin to move and congregate in areas of lower elevation. It would be inappropriate to distribute hunting pressure when moose distribution has shifted.

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

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PROPOSAL 66 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a fall, archery only moose hunt in Units 14A and 14B.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would add a 5-day, archery-only general season moose hunt from September 26–September 30 in Units 14A and 14B with a bag limit of 1 bull moose with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least 1 side.

WHAT ARE THE CURRENT REGULATIONS? Units 14A and 14B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Resident and nonresident hunters may take 1 bull moose with spike-fork antlers, or 50-inch antlers, or antlers with 3 or more brow tines on at least one side with a bow and arrow only from August 10 to August 19 in Units 14A and 14B; or under general hunt regulations without weapons restrictions from August 25 to September 25.

There are additional drawing hunt opportunities for any-bull in Units 14A and 14B as well as antlerless moose in Unit 14A.

Moose in Units 14A and 14B have been identified as important for providing high-levels of harvest for human consumption with population and harvest objectives of 6,000–6,500 moose and 360–750 moose in 14A, and 2,5000–2,800 and 100–200 moose in 14B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would add an additional five-day archery season to the end of the general season moose hunt in Units 14A and 14B. Additional days added closer to the rut will likely result in additional harvest of moose in these units due to moose being more susceptible to calling but are not expected to have an impact on populations.

BACKGROUND: Archery-only seasons were adopted in Units 14B and 16A in regulatory year (RY) 1995 and in Unit 14A in 1998. The season dates were August 10–August 17 from their inception until RY2022 when two days were added to the end of the archery hunt making it August 10–August 19. Over the last 5 years 9.2% of the harvest in Unit 14A is taken by bow and arrow, 6.1% of moose harvested in Unit 14B, and 1.3% of moose taken in Unit 16A are taken by these methods as well. Approximately 70% of moose taken by this means are during the archery-only season. The chronology of the harvest varies by unit, but harvest does consistently increase as the season progresses (Figure 66-1).

The moose population in Unit 14A has been above the objective of 6,000–6,500 moose for the last 16 years, although it has declined from its peak of an estimated 8,756 moose in 2017 to 6,657

moose in the most recent survey in 2023. Unit 14B was last surveyed in 2021 with an estimate of 2,463 moose, below the objective of 2500–2800 moose (Figure 66-2)

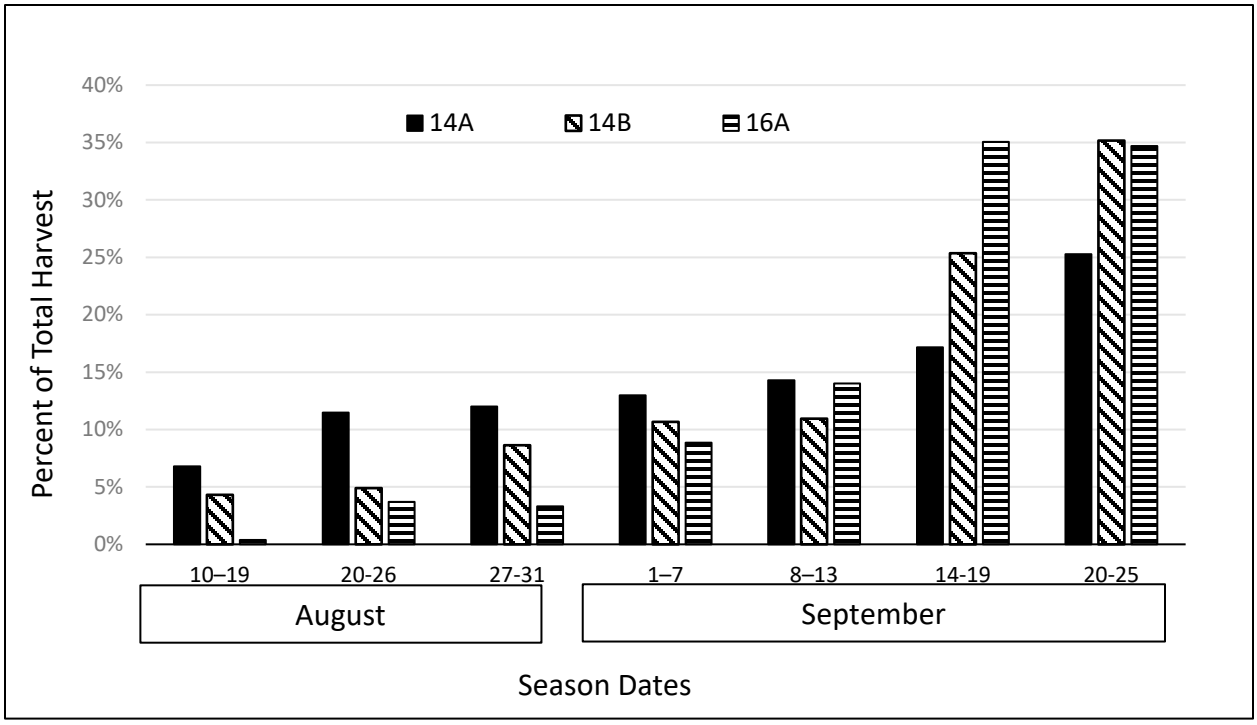

Figure 66-1. Moose harvest chronology in Units 14A, 14B, and 16A, RY19–23.

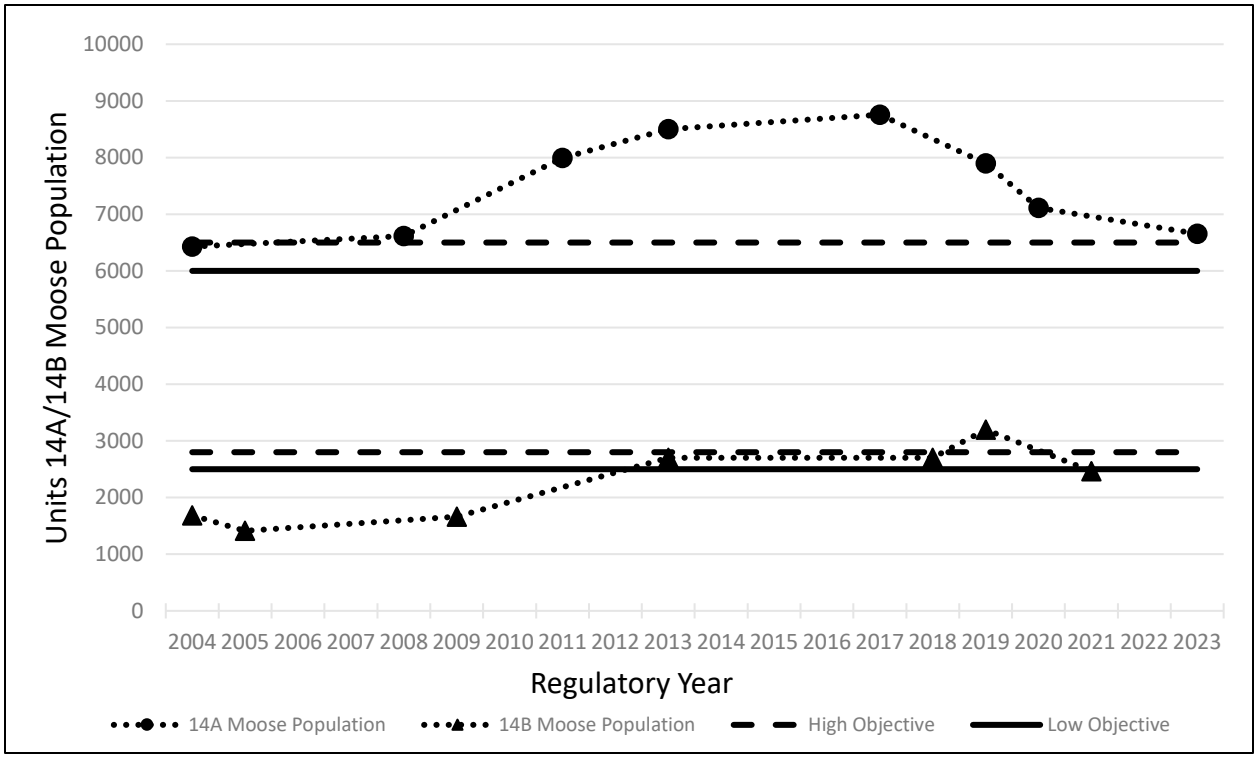

Figure 66-2. Moose population estimates for Units 14A and 14B, RY04–23.

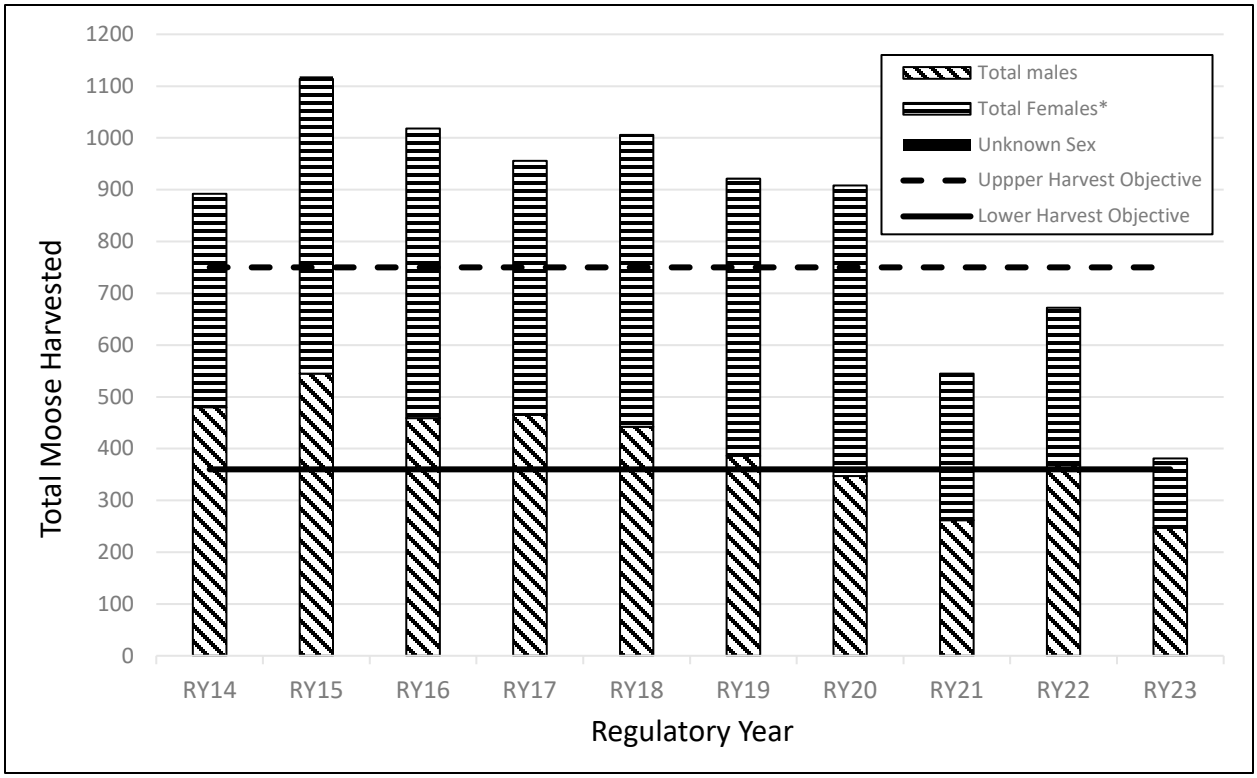

Figure 66-3. Unit 14A moose harvest by Regulatory year.
*Unit 14 holds drawing hunts for antlerless moose and in RY23 began holding an any bull moose hunt with minimal harvest.

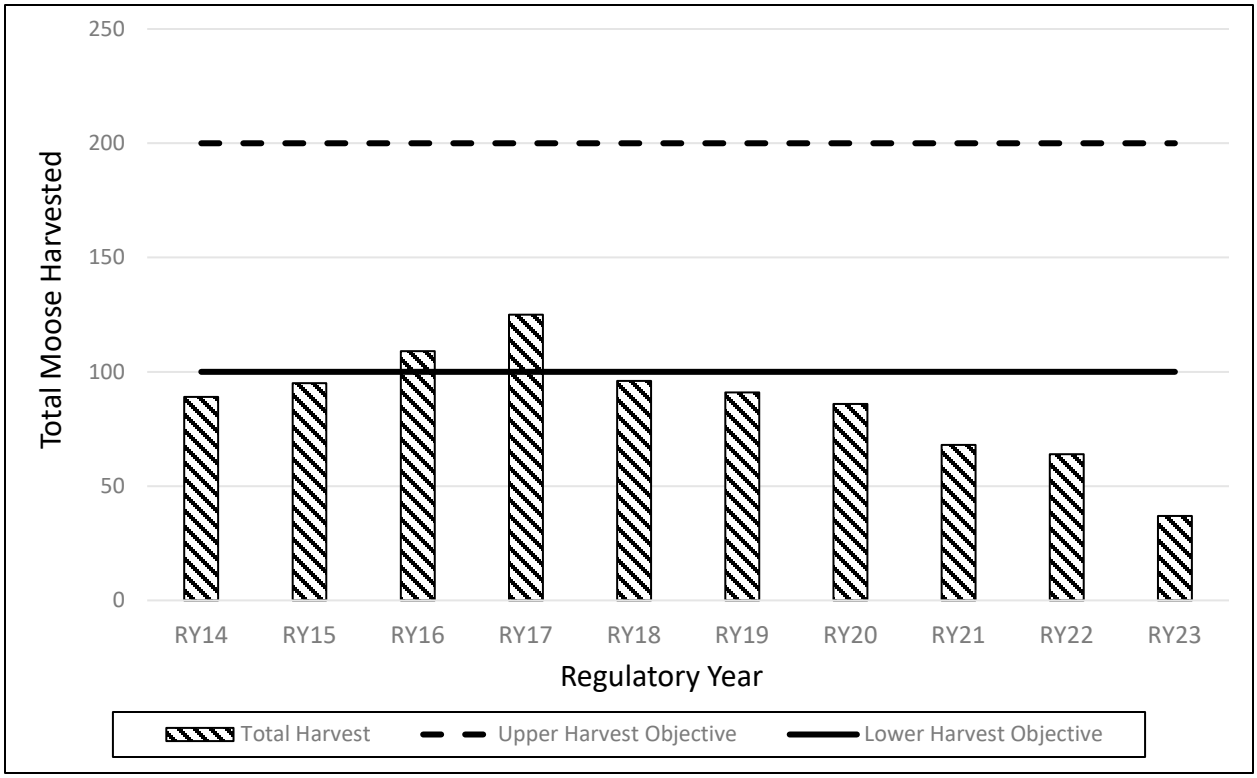

Figure 66-4. Unit 14B moose harvest by regulatory year. Unit 14B has held an any bull moose drawing hunt since 2019, but harvest levels have been relativly insignificant.

The 14B bull:100 cow ratio was 37 and the calf:100 cow ratio was 15.8. The 14A bull:100 cow ratio was 30 and the calf:100 cow ratio was 28. An archery only hunting season at the end of September will likely have significantly higher success rates than the early season archery hunt due to bull moose being more susceptible to calling. Harvest objectives in unit 14A have been met or exceeded every year for the last 10 years (Figure 66-3), although recently harvest has declined largely due to decreasing the number of antlerless moose permits issued. Unit 14B has not met the low end of the harvest objectives since 2017 with harvest declining every year since then (Figure 66-4).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to archery hunters. Adding 5 days to the general season for archery-only hunters will likely result in additional harvest. Harvest levels are not likely dictated by lack of opportunity to harvest legal bulls and providing additional opportunity at a time where the populations are near or below objective is not recommended, although it is not likely to create a population concern.

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

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PROPOSAL 67 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Establish a late season archery moose hunt in Unit 16A.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would add an archery-only general season moose hunt from September 26–September 30 in Unit 16A with a bag limit of 1 bull moose with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least 1 side.

WHAT ARE THE CURRENT REGULATIONS? Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current moose hunting regulations can be found in 5 AAC 85.045 and in the *2024–2025 Alaska Hunting Regulations*.

Resident and nonresident hunters may take 1 bull moose with spike-fork antlers, or 50-inch antlers, or antlers with 3 or more brow tines on at least one side with a bow and arrow only from August 10–August 19 in Unit 16A; or under general hunt regulations without weapons restrictions from August 20 to September 25.

There has previously been an additional drawing hunt opportunity for any-bull moose in Unit 16A although no permits were offered in Regulatory Year (RY) 2023.

Moose in Unit 16A have been identified as important for providing high-levels of harvest for human consumption and has a population and harvest objective of 3,500–4,000 moose and 190–360, respectively.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would add an additional 5-day archery season to the end of the general season moose hunt in Unit 16A. Additional days added closer to the rut will likely result in additional harvest of moose in this unit due to moose being more susceptible to calling but are not expected to have an impact on populations.

BACKGROUND: Archery-only seasons were adopted in Unit 16A in RY1995. The season dates were August 10–August 17 from their inception until RY2022 when 2 days were added to the end of the archery hunt making it August 10–August 19. Over the last 5 years, 7 bulls have been taken by archery in Unit 16A making up only 1.3% of the total moose taken in this unit. Throughout Units 14A, 14B, and 16A approximately 70% of the moose taken by archery are taken during the archery-only season. The chronology of harvest varies by unit, but harvest does consistently increase as the season progresses (Figure 67-1).

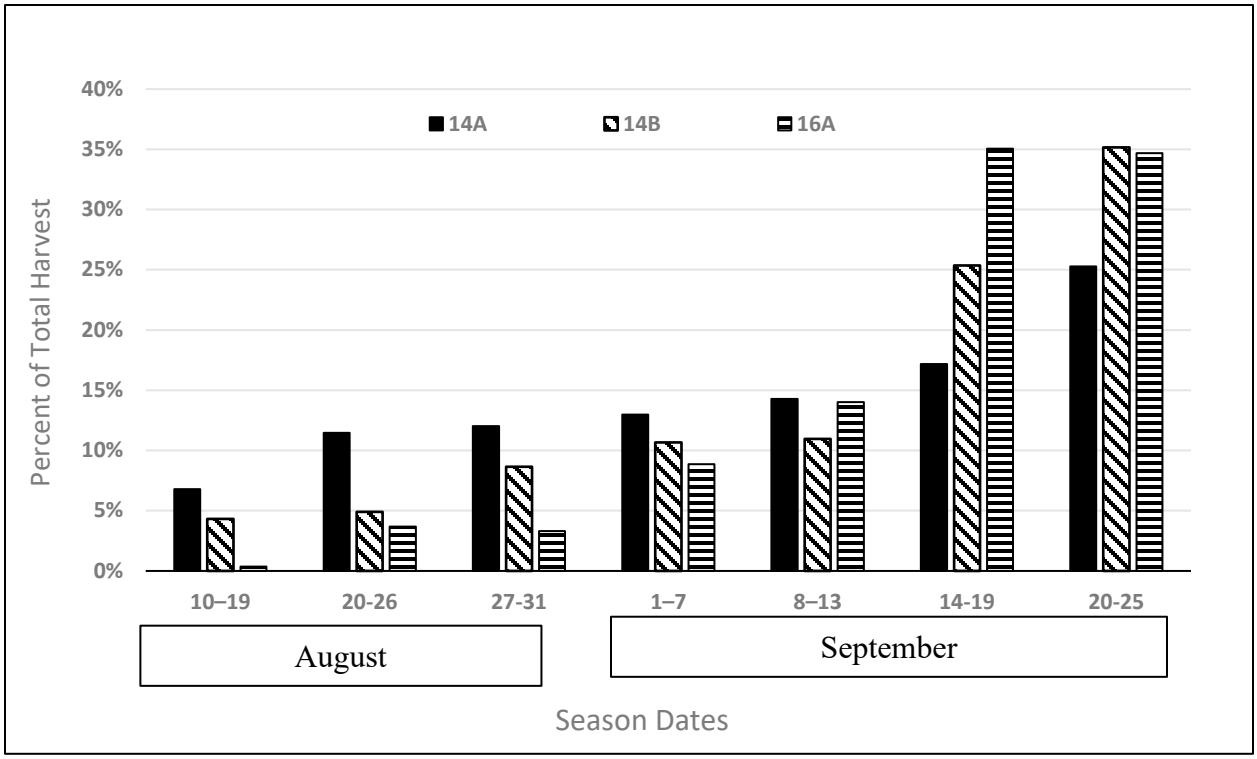

Figure 67-6. Moose harvest chronology in Units 14A, 14B, and 16A, RY2019–23.

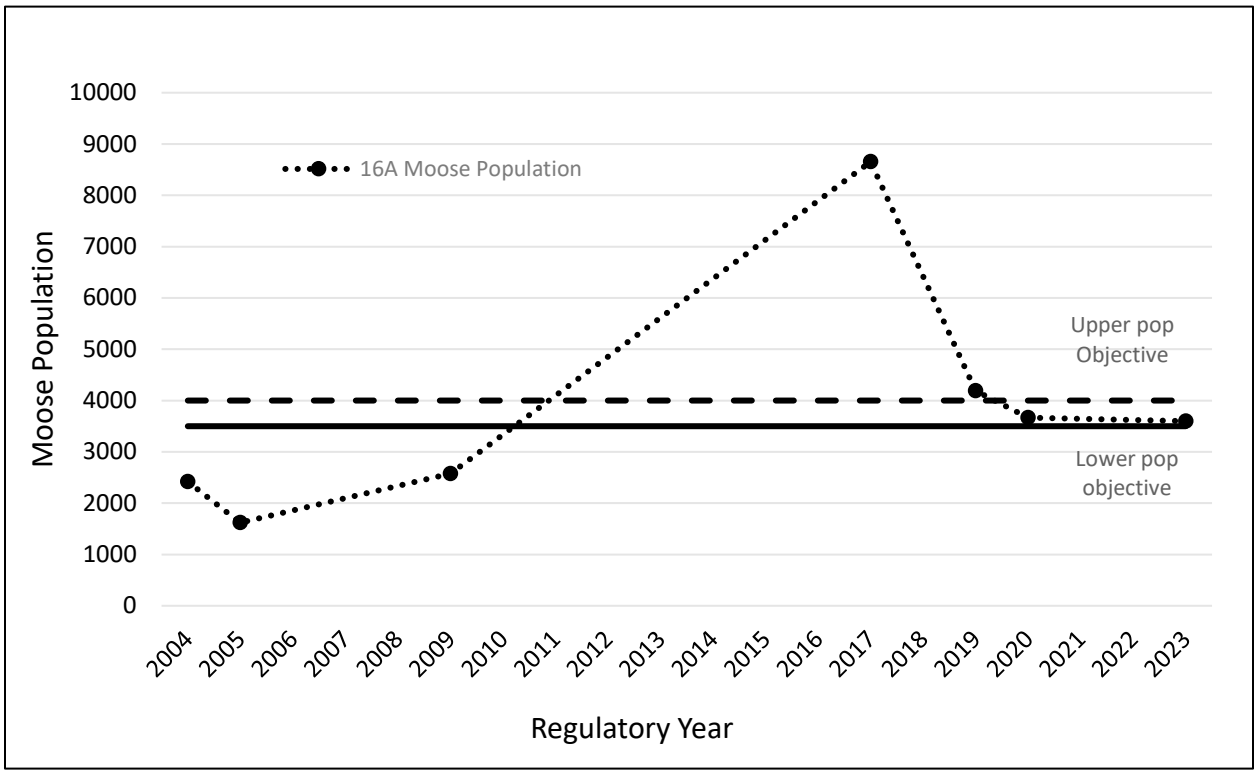

Figure 67-5. Unit 16A moose population estimates, RY04–23.

The moose population in Unit 16A was last surveyed in 2023 with a population estimate of 3,598 (±287) moose, within the population objective of 3,500-4,000 moose and consistent with the previous survey estimate of 3,666 (±344) moose in 2019. Unit 16A has not met the harvest objectives of 190-360 moose since RY2018 with the last 5-year average harvest being 111 moose (Figure 67-3). The unit previously held an any-bull draw hunt that was discontinued in RY24 due to the population nearing the lower end of the objective and a low bull to cow ratio of 19 bulls:100 cows. An archery-only hunting season at the end of September will likely have significantly higher success rates than the early season archery hunt due to bull moose being more susceptible to calling.

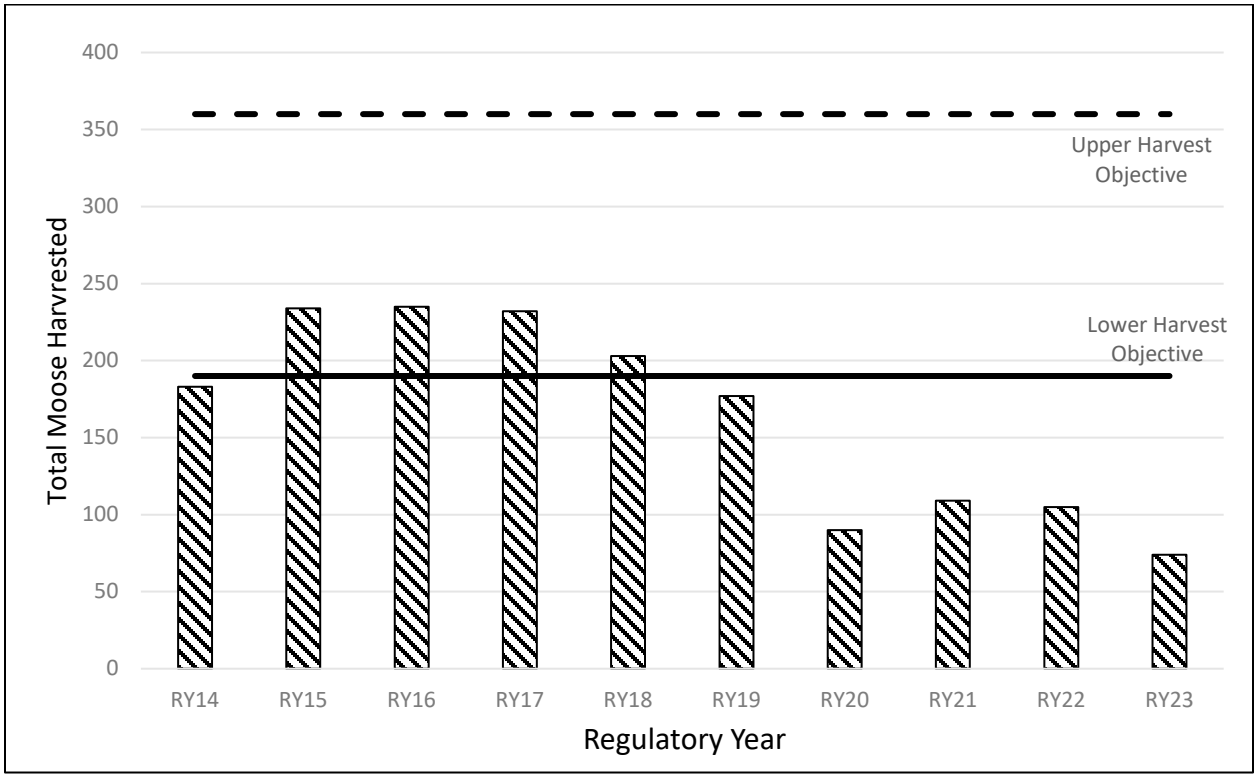

Figure 67-3. Unit 16A moose harvest and harvest objectives RY2014–RY2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to archery hunters. Adding days to the end of the general season for archery-only hunters will likely result in additional harvest but are not expected to have an impact on the population. Harvest levels are not likely dictated by lack of opportunity to harvest legal bulls in Unit 16A and providing additional opportunity at a time where the populations are near or below objective is not recommended.

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

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PROPOSAL 70 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the brown bear hunting season in Units 14A and 14B.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? Extend the brown bear hunting season in Units 14A and 14B by 15 days from May 31 to June 15.

WHAT ARE THE CURRENT REGULATIONS? Units 14A and 14B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current bear hunting regulations can be found in 5 AAC 85.020 and in the *2023–2024 Alaska Hunting Regulations*.

Unit 14A regulations allow 1 brown bear every regulatory year between September 1–May 31 for residents and nonresidents and may be taken over a bear bait station. The current regulations in Unit 14B for residents and nonresidents are 1 brown bear every regulatory year August 1–May 31. Baiting season for black bears is April 15–June 30.

In Units 14A and B there is no baiting allowed within one-quarter mile of the shorelines of the Susitna River, and the Little Susitna River, south of the Parks Highway bridge. In less developed areas, more remote areas of the region (i.e., Units 11, 13, 16) where brown bear densities are likely higher, seasons extend until at least the end of June.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide hunters with an additional 15 days at the end of the current bear season extending it from May 31 to June 15. Brown bears could be harvested at bear bait stations in this area. Adoption of this proposal is expected to result in an increased harvest of brown bears. This proposal would not result in additional conflicts with bear baiters as the black bear baiting season already extends to June 30.

BACKGROUND: The brown bear management objective is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from RY13–RY22 was 20 bears and the average percent of males was 57% (Figure 70-1),.

Brown bear populations in these units are very difficult to survey because the units are heavily forested and other methods have yet to be used to develop an estimate, so the department has used other measures of abundance such as harvest, and the number of nuisance bear complaints and defense of life and property (DLP) killed bears. On average less than 1 bear per year, in both units combined, are killed through DLP since RY18. There appears to be no trend in DLPs.

Taking brown bears at black bear bait stations became legal in Unit 14B in RY15 and Unit 14A in RY18. Since RY18, an average of 90% of bears taken in the spring have been taken over bait. The

harvest chronology in Units 14A and 14B has shifted from being relatively equally distributed throughout the season or skewed toward fall to being strongly skewed toward spring since RY18 (Table 70-1).

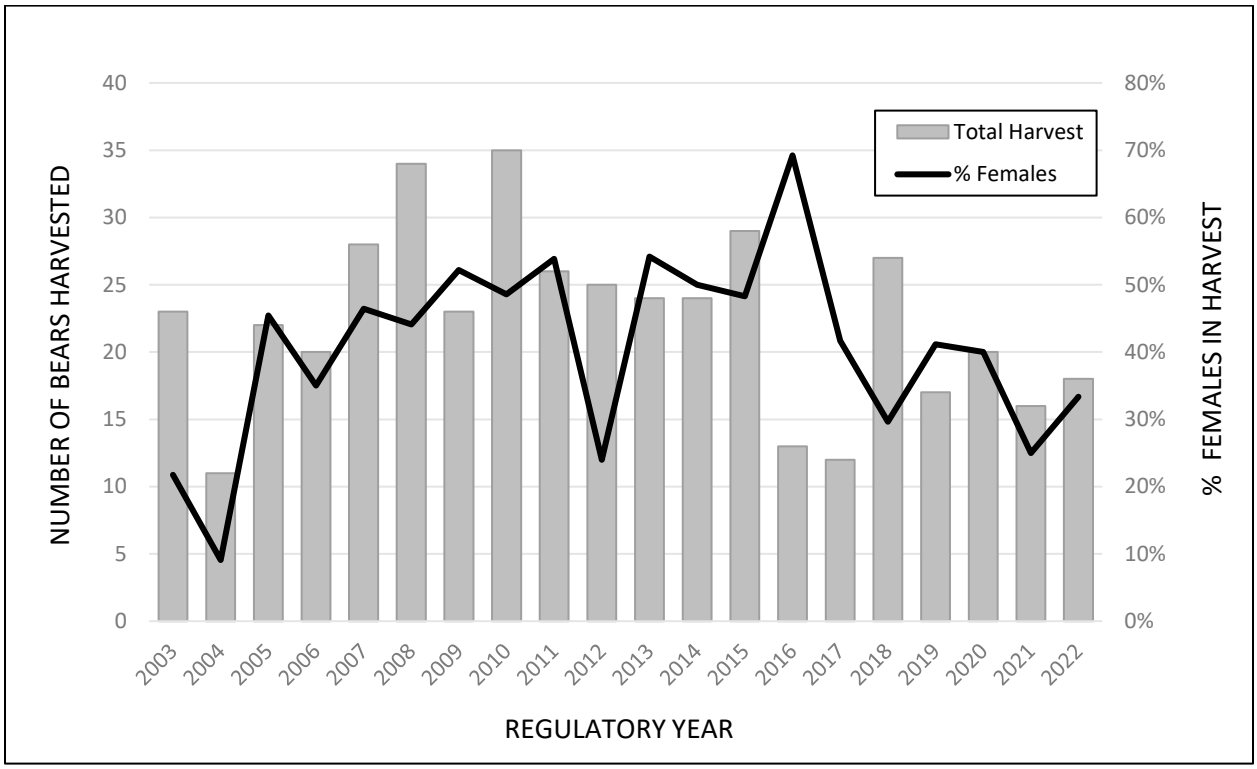

Figure 70-1. Unit 14A&B total brown bear harvest and percent female of harvest, RY2003–2022.

Table 70-1. Chronology of the harvest of brown bears in Units 14A & 14B, RY2015–19.

	July	August		September		October through	May		June	
Reg Year	1–31	1–15	16–31	1–15	16–30	April	1–15	16–31	1–30	Total
RY18	4%	4%	11%	15%	4%	0%	0%	59%	4%	27
RY19	0%	0%	12%	18%	12%	6%	6%	47%	0%	17
RY20	5%	0%	15%	15%	20%	15%	10%	20%	0%	20
RY21	0%	0%	0%	13%	13%	19%	6%	44%	6%	16
RY22	6%	4%	0%	11%	39%	11%	6%	22%	0%	18

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal, and recommends the board extend the season to June 30 in both Unit 14A and 14B as it has not identified a biological concern for bears, and aligning the brown bear season with the black bear season reduces

regulatory complexity for hunters. This would allow for taking brown bears at bait stations throughout the baiting season.

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

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PROPOSAL 71 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the brown bear hunting season in Unit 14B.

PROPOSED BY: Dominic Nickles

WHAT WOULD THE PROPOSAL DO? This proposal would extend the brown bear hunting season in Unit 14B by 30 days from May 31 to June 30.

WHAT ARE THE CURRENT REGULATIONS? Unit 14B is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Unit 14B regulations allow 1 brown bear every regulatory year August 10–May 31. Baiting season for black bears is April 15–June 30.

In Unit 14B there is no baiting allowed within one-quarter mile of the shorelines of the Susitna River, and the Little Susitna River, south of the Parks Highway bridge. In less developed areas, more remote areas of the region (i.e., Units 11 and 13) where brown bear densities are likely higher, seasons extend until the end of June and allow the taking of brown bears at bait stations.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide hunters with an additional 30 days added to the end of the current bear season extending it from May 31 to June 30. Brown bears can be harvested at black bear bait stations in this area. The adoption of this proposal is expected to result in an increased harvest of brown bears. This proposal would not result in additional conflicts with bear baiters as the black bear baiting season already extends to June 30.

BACKGROUND: The brown bear management objective for Units 14A and 14B combined is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from RY13–RY22 for unit 14B was 12 bears and the average percent of males was 60% (Figure 71-1),.

Brown bear populations in this unit are very difficult to survey because the unit is heavily forested and other methods have yet to be used to develop an estimate, so the department has used other measures of abundance such as harvest, and the number of nuisance bear complaints and defense of life and property (DLP) killed bears. On average less than 1 bear in the unit is killed by DLP.

Taking brown bears at black bear bait stations became legal in Unit 14B in RY15. Since that time, an average of 86% of bears taken in the spring in Unit 14B have been taken over bait. The harvest chronology in Units 14B has shifted from being relatively concentrated in the fall season to being skewed toward the second half of May since RY18 (Table 71-1).

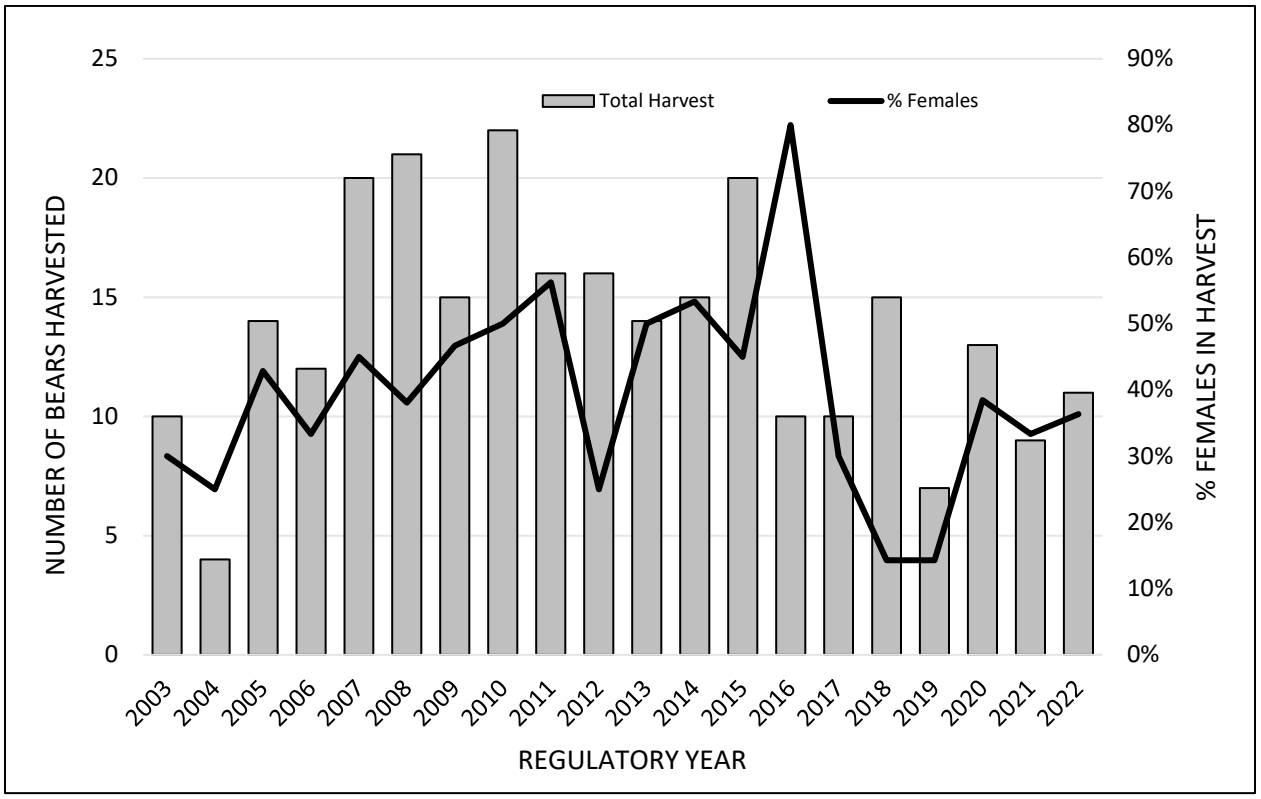

Figure 71-1. Unit 14B total brown bear harvest and percent female in harvest, RY2003–2022.

Table 71-1. Chronology of the harvest of brown bears in Unit 14B, RY2018–22.

	July	August		September		October	May		June	
Reg. Year	1–31	1–15	16–31	1–15	16–30	–April	1–15	16–31	1–30	Total
RY18	7%	7%	20%	13%	7%	0%	0%	47%	0%	15
RY19	0%	0%	14%	29%	29%	14%	0%	14%	0%	7
RY20	8%	0%	23%	0%	31%	15%	15%	8%	0%	13
RY21	0%	0%	0%	11%	11%	33%	0%	33%	11%	9
RY22	9%	9%	0%	18%	27%	9%	9%	18%	0%	11

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it has not identified a biological concern for bears in Unit 14B. Adoption of this proposal is expected to

increase harvest of brown bears, and aligning the brown bear seasons with the black bear season reduces regulatory complexity for hunters.

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

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PROPOSAL 72 - 5 AAC 90.010 Harvest tickets and reports. Eliminate the harvest ticket requirement for black bear in Unit 16.

PROPOSED BY: Mount Yenlo Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove the requirement for bear hunters to get and carry harvest tickets while hunting black bears in Unit 16.

WHAT ARE THE CURRENT REGULATIONS? There is a positive customary and traditional use (C&T) finding for black bears in Unit 16B, and an amount reasonably necessary for subsistence (ANS) of 15 – 40 bears. Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

5 AAC 92.010 Harvest tickets and reports. …(l) For black bear, a person may not hunt black bear in Units 1–7, 11–16, 19(D), and 20, except when a permit is required, unless the person has in possession a harvest ticket for the species and has obtained a harvest report.

5 AAC 85.015 Hunting seasons and bag limits for black bear.

Unit 16(B), that portion within 1 mile radius of the mouth of Wolverine creek…

Resident and Nonresident hunters

	5 bears	Sept. 15–May 31
Remainder of Unit 16.	5 bears	No closed season

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. (b) (1) A person may establish a black bear bait station, or a black and brown bear bait station in Unit… 16...

Season dates for bear baiting in Unit 16: July 1–October 15, April 15–June 30.
….

5 AAC 92.165. Sealing of bear skins and skulls. (a) Sealing is required for … hides and skulls of black bear of any color variation taken from January 1 through May 31, and skulls of black bear of any color variation taken from June 1 through December 31 in Units 1–7, 14(A), 14(C), 15–17, and 20(B)….

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Black bear hunters in Unit 16 would no longer need to obtain or carry on their person harvest tickets for hunting black bears. Additionally, there would be no harvest report for hunters to fill out and return to the department. Bear harvest would be tracked through sealing of harvested bears which is a requirement in Unit 16. Hunter effort information (days hunted/bear harvested) is collected at the time of sealing for successful hunts. Effort information for unsuccessful hunts is collected only through the harvest report that is part of the harvest ticket system and there would be no way to gauge effort by unsuccessful hunters.

BACKGROUND: Harvest tickets are currently required in units 1–7, 11–16, 19D, and 20 except when a permit is required. Harvest tickets are free and available at Fish and Game offices, local vendors, and online. Harvest tickets provide the department with information on effort for unsuccessful hunts. This information is difficult to interpret in some areas such as Unit 16.

An average of 718 hunters reported hunting black bear in Unit 16 annually from regulatory year 2013–2023 (Figure 72-1), many of these were moose hunters who also obtained a black bear harvest ticket but were not targeting black bears. Hunters, harvest, and success rates have been increasing since 2019, with total reported harvest increasing from 133 in 2019 to 343 in 2023. The bag limit for black bears in Unit 16B is 5 bears. The average number of hunters who harvest all 5 bears in the unit is less than 1 hunter per year. There is always some discrepancy between what is

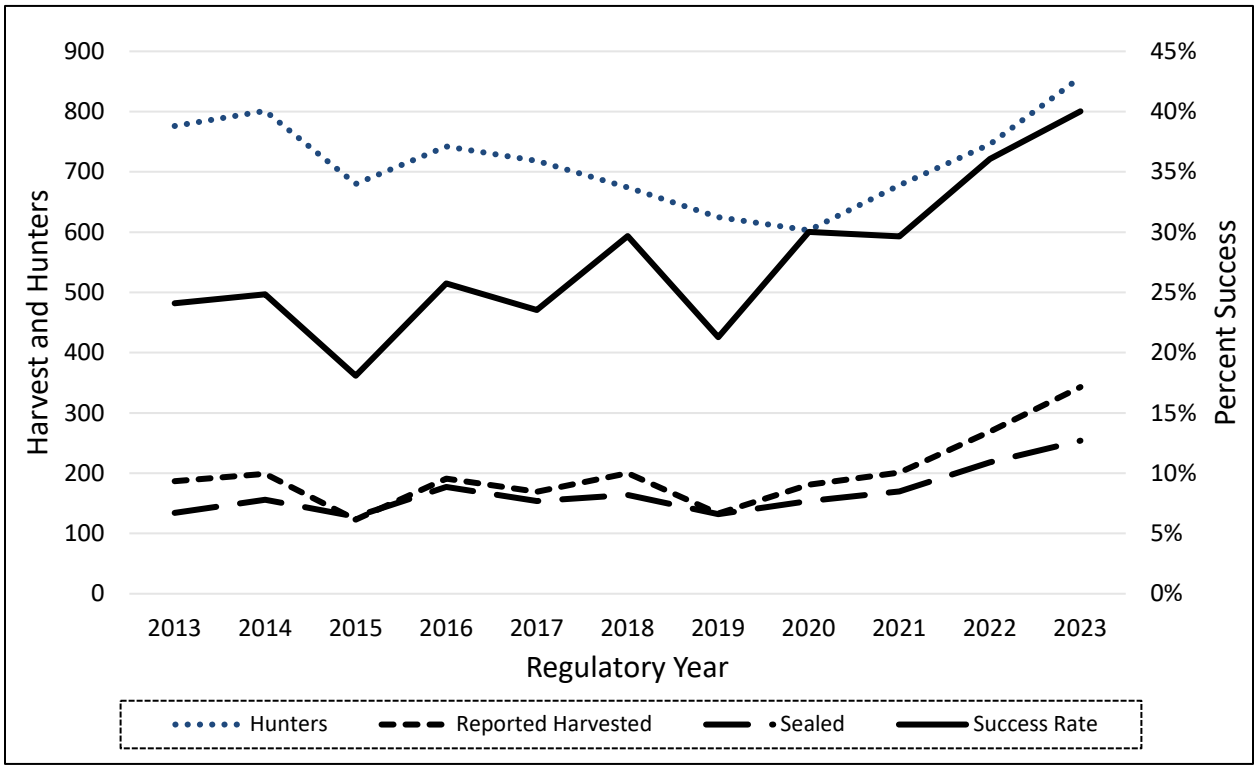

Figure 72-1. Black Bear hunters, harvest, and black bears sealed, regulatory years 2013–2023.

sealed and what is reported as harvested, indicating not all of the public understands or follows the current requirements.

Consistency between hunt areas and between years is a factor to consider for this proposal. Every year the department has hunters who come in to seal a bear but do not have the appropriate tags or harvest tickets. Usually this is due to not carefully reading the regulations and not being aware of different requirements in units that are adjacent.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Consistency of regulations through time and across commonly traveled boundaries is beneficial to hunters by reducing confusion and prevents common violations. In addition, effort and location data for unsuccessful hunters can be a useful metric in determining management strategies.

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

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PROPOSAL 73 – 5 AAC 85.055 85. 055 Hunting seasons and bag limits for Dall sheep. Change the bag limit for Dall sheep in Unit 14A Chugach to any–ram.

PROPOSED BY: Tony Kavalok

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit for Dall sheep in Unit 14A-South and east of the Matanuska River from 1 ram with full-curl horns or larger, both horns broken, or at least eight-years-old back to 1 ram. Nonresidents would still only be able to harvest one ram every four regulatory years.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current Dall sheep hunting regulations for Unit 14A can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*.

Resident

Units and Bag Limits	**Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
Unit 14(A), south and east of the Matanuska River; up to 100 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horns or larger, both horns broken, or at least	Aug. 10 – Sept.20	

eight-years-old, by drawing permit only

NONRESIDENT HUNTERS: Aug. 10 – Sept. 20
1 ram with full-curl horns or larger,
both horns broken, or at least
eight-years-old, every 4
regulatory years, by drawing permit only

Under the current hunt structure, the season is divided, August 10–August 25 or August 26–September 20, and 3 areas as shown on the map below (Figure 73-1). Ten percent of permits are allocated to nonresidents. Hunters cannot win the same permit two years in a row, regardless of if they hunted or harvested a ram.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would change the bag limit in the Chugach Mountains portion of Unit 14A from a ram with horns that is full-curl or larger, both horns broken, or eight-years old back to any-ram with no horn restriction. If adopted, hunter success will improve. Overharvest can be controlled by limiting the number of permits available.

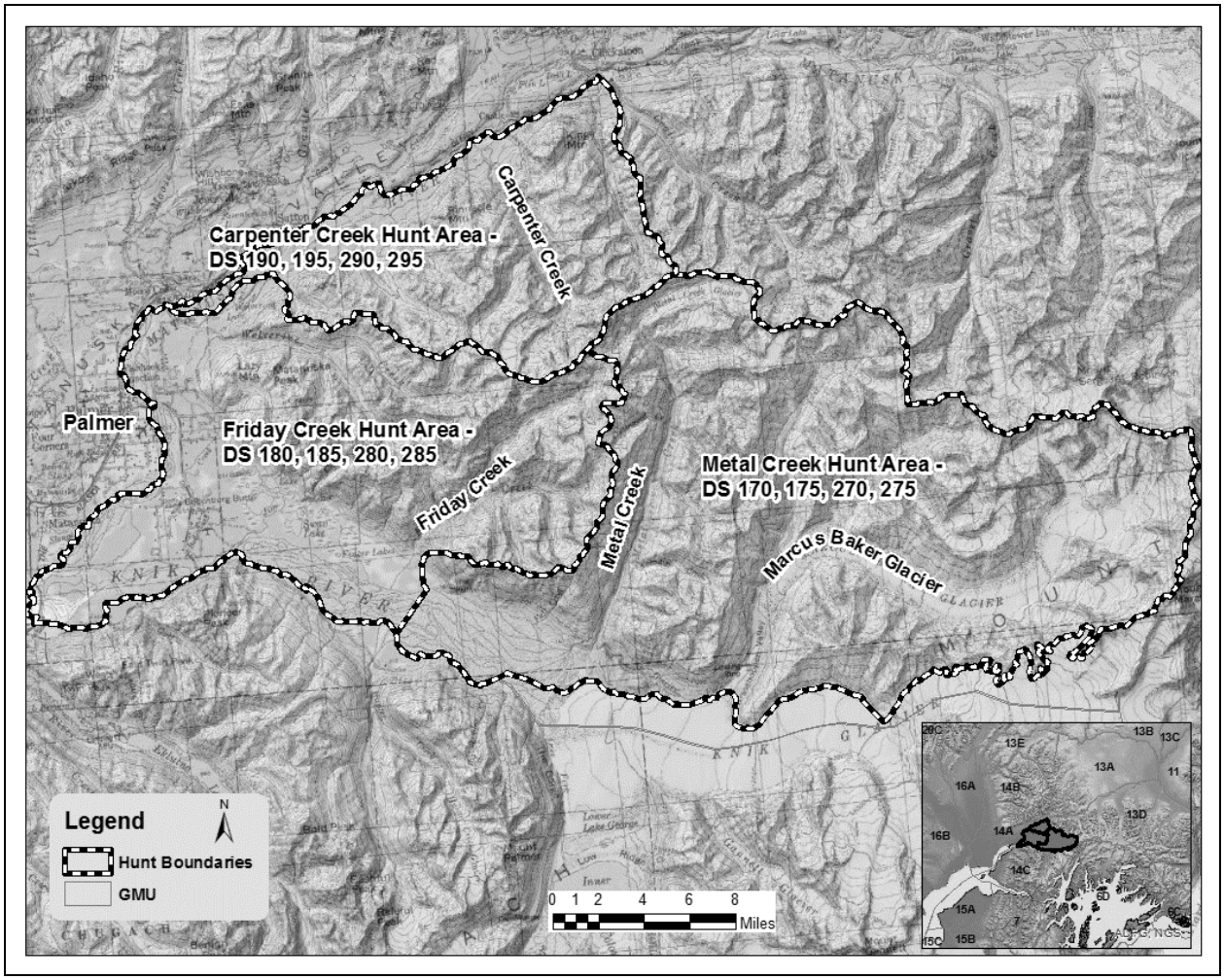

Figure 73-1. Location of the 3 current Chugach Mountain sheep draw hunt areas in Unit 14A.

BACKGROUND: The Board of Game adopted regulatory changes to the hunt structure in 2007 following a decline in sheep numbers and continued high hunting pressure. The regulatory changes included the establishment of a drawing hunt structure in the Chugach Mountain areas, liberalization of bag limits in Unit 14A and western 13D to include any-ram hunts, and the allocation of harvest opportunity between residents and nonresidents. The current hunt structure was also designed to improve hunt quality by reducing hunter crowding through a drawing permit hunt structure, which reduced the number of hunters in the field by 62% in Unit 14A.

After the any ram drawing hunts were implemented in Unit 14A, sheep harvest decreased from an average of 24 rams (2000–2007) to 16 rams (2008–2022) (Table 73-1). The current level of harvest is sustainable and has not had been a driving factor for the population decline. The population declines that have been observed in recent years are largely due to poor weather conditions. Under the any ram hunt structure the pressure on the full curl segment of the population was significantly reduced while still allowing for several trophy rams to be available to hunters dedicated to finding

large rams (Table 73-2). The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system.

In RY2023, the board changed the bag limit to one ram with full-curl horns or larger, both horns broken, or at least eight-years-old.

Table 73-1. Unit 14A Dall sheep ram composition survey results and associated harvest, RY98–RY23.

	Total Permits	Total Hunters	Total Harvested	% Success	Average of Length Longest Horn	Max Length of Longest Horn	Average of Age
Pre-Draw							
2002	-	104	20	19	34.5	38.5	8.4
2003	-	103	22	21	35.9	40.5	8.9
2004	-	113	32	28	36.1	42.1	8.5
2005	-	104	29	28	36.5	41.4	8.4
2006	-	125	24	19	36.1	40.5	8.5
2007	-	104	22	21	35.4	40.9	8.6
Post-Draw (Any-Ram)							
2008	40	28	9	32	32.8	38.3	6.7
2009	40	26	11	42	27.6	36.9	5.5
2010	40	21	6	29	29.4	36.0	6.7
2011	50	40	14	35	35.0	38.0	7.4
2012	50	40	13	33	32.7	38.6	7.2
2013	75	41	18	44	30.6	40.8	6.9
2014	74	53	18	34	33.2	41.3	7.1
2015	75	53	22	42	32.5	39.3	7.3
2016	75	53	15	28	32.5	40.8	7.5
2017	75	55	25	45	30.8	38.8	6.5
2018	64	49	20	41	30.8	40.3	5.8
2019	64	50	24	48	30.1	38.1	5.1
2020	52	40	14	35	32.1	37.9	5.6
2021	53	40	11	28	30.1	37.0	6.1
2022	48	35	15	43	32.1	39.6	6.7
Post-Draw (Full-Curl)							
2023	14	10	3	30	34.6	37.1	10.0

Table 73-2. Unit 14A draw Dall sheep harvest, hunter success, horn length, and associated age pre- and post-draw RY02–RY23.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested[a]	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
1998	218	28	38	135.71%	190	0	0%
2002	276	19	32	168.42%	257	0	0%
2006	167	26	35	134.62%	141	0	0%
2007	145	18	34	188.89%	127	0	0%
Post Draw (Any-Ram)							
2009	134	8	0	0.00%	126	11	9%
2010	167	14	3	21.43%	153	3	2%
2012	177	16	5	31.25%	161	8	5%
2013	168	11	7	63.64%	157	11	7%
2014	172	13	9	69.23%	155	9	6%
2017	254	14	7	50.00%	240	18	8%
2019	207	10	4	40.00%	197	20	10%
2020	197	14	1	7.14%	183	13	7%
2022	120	9	6	66.67%	111	9	8%
Post Draw (Full-Curl)							
2023	142	13	2	15.38%	127	1	1%

[a] Percent full curl harvested is in relation to the number of full-curl rams observed during the most recent surveys. Percentages greater than 100% indicate that more rams were harvested than were observed during that year's survey.

Hunter success increased from 22% to 37% after the drawing permit hunt was implemented. The horn length of sheep harvested decreased from an average of 36 inches to 32 inches during the same periods moving from full-curl to any-ram. While the department anticipated a decrease in the overall horn length because of the change in the management strategy, Taz-West in Unit 13D did not experience a decrease in horn length. Part of the reason for the decrease appears to be in the method of access in the area. In the Unit 14A portion of the Chugach there are a few places where hunters on foot or ATV can access the area. Among those hunters who reported taking a <3/4 curl ram since the area went to an any ram bag limit in 2007, 47% accessed the area by ATV, horse, or on foot, and 53% used airplanes. Among hunters who took sheep ≥7/8 curl to over full curl, 70% used airplanes and only 30% accessed the area by other methods. After these draw hunts were changed back to full curl beginning in the 2023 season, the average horn length increased to 35 inches while the total harvested declined to 3 rams and the success rate declined to 30%.

The any-ram opportunity provided by these drawing hunts was extremely popular because it removed the legal requirement of judging full-curl before harvesting a sheep, allowing less

experienced hunters the opportunity to attempt a sheep hunt. This is demonstrated by the 9,075 applications received for these hunts in 2022, the last year it was any ram. The only sheep drawing more popular was the Delta Controlled Use Area which received 9,990 applications for 2022. The applications for these 14A hunts decreased to 4,165 in 2023 after it went to full curl.

The current hunt structure was designed to improve hunt quality by reducing hunter crowding through a drawing permit hunt structure, which reduced the number of hunters in the field by 62% in Unit 14A after moving to draw and reduced it further after restricting it to full curl in 2023.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because either current or proposed management strategy can be used to sustainably manage sheep in the unit. Neither full-curl or any ram management strategies resulted in a substantial change in the number of sheep, or the number of rams observed during surveys in this area. The current decline is largely due to weather events and has been observed in both full-curl and any-ram management areas as well as non-hunted areas. Providing sheep hunting opportunity to hunters who are not well practiced in judging full curl is desired by many Alaskan hunters.

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

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PROPOSAL 74 - 5 AAC 85. 055 Hunting seasons and bag limits for Dall sheep. Establish a resident, archery only, sheep drawing hunt in the Chugach Mountain portion of Unit 14A.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would create an archery only drawing hunt for residents for Dall Sheep in the Unit 14A Chugach Mountains, utilizing the combined hunt areas for DS170, DS180, and DS190 from October 1–October 15 with a bag limit of 1 Dall sheep with full-curl horns or larger.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current Dall sheep hunting regulations for Unit 14A can be found in 5 AAC 85.055 and in the *2024–2025 Alaska Hunting Regulations*.

Resident

Units and Bag Limits	**Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
…		
Unit 14(A), south and east of the Matanuska River; up to 100 permits may be issued		

RESIDENT HUNTERS: Aug. 10 – Sept.20
1 ram with full-curl horns or larger,
both horns broken, or at least
eight-years-old, by drawing permit only

NONRESIDENT HUNTERS: Aug. 10 – Sept. 20
1 ram with full-curl horns or larger,
both horns broken, or at least
eight-years-old, every 4
regulatory years, by drawing permit only
….

Under the current hunt structure, the season is divided into 2 seasons and 3 areas as shown on the map below (Figure 74-1). The drawing hunts DS170, DS180, DS190, DS270, DS280, DS290 are all August 10–August 25 and DS175, DS185, DS195, DS275, DS285, and DS295 are all August 26–September 20. Ten percent of permits are allocated to nonresidents.

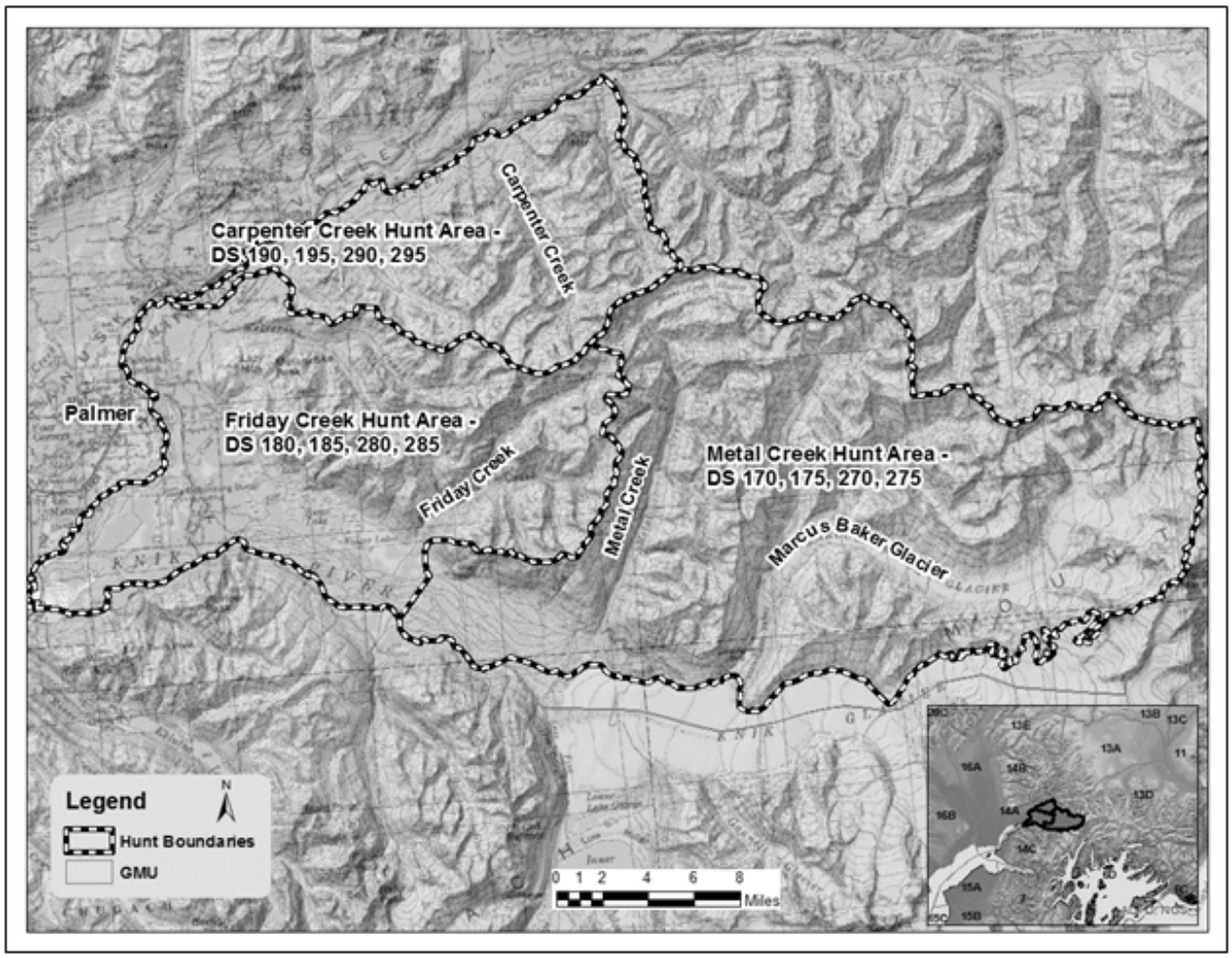

Figure 74-7. Location of the 3 Chugach Mountain draw hunt areas in Unit 14A.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create an additional 15 days to hunt full-curl sheep in the Unit 14A Chugach area limited to archery equipment only. While it is expected this hunt would have very low success rates, it would still increase harvest on an already low sheep population. The proponent suggests offering 1 to 5 permits in the foreseeable future while the populations recover from the current lows. Aircraft could be used to spot sheep if the board passes this proposal, however the proponent also notes a proposal submitted for the Statewide Regulations meeting (Proposal 98) that would extend the existing airplane restriction to cover the timeframe of this new hunt.

BACKGROUND: The board adopted regulatory changes to the hunt structure in 2007 following a decline in sheep numbers and continued high hunting pressure. The regulatory changes included the establishment of a drawing hunt structure in the Chugach Mountain areas, liberalization of bag limits in Unit 14A and western Unit 13D to include any-ram hunts, and the allocation of harvest opportunity between residents and nonresidents. The current hunt structure was also designed to

improve hunt quality by reducing hunter crowding through a drawing permit hunt structure, which reduced the number of hunters in the field by 62% in Unit 14A.

After the any ram drawing hunts were implemented in Unit 14A, sheep harvest decreased from an average of 24 rams (2000–2007) to 16 rams (2008–2022) (Table 74-1). The current level of harvest is sustainable and has not been a driving factor for the population decline. The population declines that have been observed in recent years are largely due to poor weather conditions. Under the any ram hunt structure the pressure on the full curl segment of the population was significantly reduced while still allowing for several trophy rams to be available to hunters dedicated to finding large rams (Table 74–2). The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system.

In RY2023, the board changed the bag limit to one ram with full-curl horns or larger, both horns broken, or at least eight-years-old.

Table 74-1. Unit 14A Dall sheep ram composition survey results and associated harvest, RY98–RY23.

	Total Permits	Total Hunters	Total Harvested	% Success	Average of Length Longest Horn	Max Length of Longest Horn	Average of Age
Pre-Draw							
2002	-	104	20	19	34.5	38.5	8.4
2003	-	103	22	21	35.9	40.5	8.9
2004	-	113	32	28	36.1	42.1	8.5
2005	-	104	29	28	36.5	41.4	8.4
2006	-	125	24	19	36.1	40.5	8.5
2007	-	104	22	21	35.4	40.9	8.6
Post-Draw (Any-Ram)							
2008	40	28	9	32	32.8	38.3	6.7
2009	40	26	11	42	27.6	36.9	5.5
2010	40	21	6	29	29.4	36.0	6.7
2011	50	40	14	35	35.0	38.0	7.4
2012	50	40	13	33	32.7	38.6	7.2
2013	75	41	18	44	30.6	40.8	6.9
2014	74	53	18	34	33.2	41.3	7.1
2015	75	53	22	42	32.5	39.3	7.3
2016	75	53	15	28	32.5	40.8	7.5
2017	75	55	25	45	30.8	38.8	6.5
2018	64	49	20	41	30.8	40.3	5.8
2019	64	50	24	48	30.1	38.1	5.1
2020	52	40	14	35	32.1	37.9	5.6

2021	53	40	11	28	30.1	37.0	6.1
2022	48	35	15	43	32.1	39.6	6.7
Post-Draw (Full-Curl)							
2023	14	10	3	30	34.6	37.1	10.0

Table 74-2. Unit 14A draw Dall sheep harvest, hunter success, horn length, and associated age pre- and post-draw RY02–RY23.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested[a]	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
1998	218	28	38	135.71%	190	0	0%
2002	276	19	32	168.42%	257	0	0%
2006	167	26	35	134.62%	141	0	0%
2007	145	18	34	188.89%	127	0	0%
Post Draw (Any-Ram)							
2009	134	8	0	0.00%	126	11	9%
2010	167	14	3	21.43%	153	3	2%
2012	177	16	5	31.25%	161	8	5%
2013	168	11	7	63.64%	157	11	7%
2014	172	13	9	69.23%	155	9	6%
2017	254	14	7	50.00%	240	18	8%
2019	207	10	4	40.00%	197	20	10%
2020	197	14	1	7.14%	183	13	7%
2022	120	9	6	66.67%	111	9	8%
Post Draw (Full-Curl)							
2023	142	13	2	15.38%	127	1	1%

[a] Percent full curl harvested is in relation to the number of full curl rams observed during the most recent surveys. Percentages greater than 100% indicate that more rams were harvested than were observed during that year's survey.

The current hunt structure was in part designed to improve hunt quality by reducing "hunter crowding" through a drawing permit, which reduced the number of hunters in the field by 62% in Unit 14A after moving to draw and reduced it substantially further after restricting it to full curl in 2022. Given the low success rates of bow hunters permit levels could be higher than is given out during the regular draw period of August 10–September 20.

Some full curl rams survive the regular hunting season each year based on the survey and harvest data (Table 74-2). The harvest of full curl rams is not considered a biological concern for the sheep population. Access to the proposed hunt area is difficult and is primarily via aircraft (53%). There will likely be weather related complications that are associated with access to this late in the season

and the ability to hunt as this area frequently has early winter conditions during the proposed hunt dates.

Unit 14C has two similar archery-only hunts to this proposed hunt; DS140, held the first 10 days of October, and DS141, held during the month of September. The 10-year average success rate for these hunts is 9%, with an average harvest of 4.6 rams from 81.1 permits issued (Table 74-3). With the proposed hunt being full curl rams, only late season, and access being more difficult than 14C, success rates are expected to be even lower.

Table 74-3. Unit 14C DS140 and DS141 participation and harvest RY14–RY23.

Reg Year	Permits	Hunted	Harvested	Participation	Success Rate
2014	81	43	3	53%	7%
2015	81	39	2	48%	5%
2016	82	55	4	67%	7%
2017	81	50	8	62%	16%
2018	81	54	5	67%	9%
2019	81	54	6	67%	11%
2020	81	56	7	69%	13%
2021	81	40	3	49%	8%
2022	81	47	5	58%	11%
2023	81	50	3	62%	6%
Average	81.1	48.8	4.6	60%	9%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of Dall sheep hunting opportunity to archery hunters. The department has not identified a biological concern for sheep managed under the full-curl harvest strategy. Due to recent declines in this sheep population, additional harvest is not recommended, and while slight, adoption of this proposal is expected to result in an increase in the number of sheep harvested.

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

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PROPOSAL 75 - 5 AAC 92.122 Intensive Management Plan VI. Add department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan (IM).

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would authorize department staff to remove predators (black bears, brown bears and wolves) with the use of aircraft, including helicopters, to achieve reduction goals.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.122 Intensive Management Plan VI.

…

(b) Unit 16 Predation Control Area

…

(4) authorized methods and means are as follows:

(A) hunting and trapping of wolves by the public in the Unit 16 Predation Control Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles as provided in 5 AAC 92.080;

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

(C) hunting of black and brown bears by the public in the Unit 16 Predation Control Area during the term of the program will occur as provided in the hunting regulations set out elsewhere in this title;

(D) the commissioner may issue public bear control permits to reduce the black bear and brown bear populations within the Unit 16 Predation Control Area by the following methods and means: (i) legal animal is any black bear, including sows and cubs, and any brown bear, except sows with cubs of the year and cubs of the year; (ii) no bag limit; (iii) same-day-airborne taking of bears if the permittee is at least 300 feet from the airplane; (iv) same-day-airborne taking of bears if the permittee is at least 300 feet from the aircraft, including the use of any type of aircraft, such as fixed-wing aircraft or helicopter, to access bear baiting stations from April 15 through October 15, except that helicopters may not be used from August 5 through September 25; (v) April 15 through October 15 baiting season for bears; up to four bear bait stations per permittee; (vi) repealed 6/23/2022 (vii) repealed 6/23/2022 (viii) repealed 6/23/2022 (ix) repealed 6/23/2022.

….

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted department staff would be able to remove predators as part of the IM plan. The department is more efficient in predator removal than the public and could achieve predator reduction goals efficiently when necessary. Moose calf survival in Unit 16 should increase expediently if predator reductions were to occur over a shorter, more precise timeframe.

BACKGROUND: The department would like to have the ability to allow staff to conduct predator control as part of the IM plan for Unit 16, in the event that public participation is insufficient to meet removal objectives specified in the IM plan. In the spring 2023 a minimum count of wolves in Unit 16 was conducted. Twenty-three packs were located with a minimum

count of 118 wolves identified from direct observation and observation of tracks. Additional packs are known to inhabit areas that were not checked due to time and weather constraints. The department projected 150–180 wolves in Unit 16 in the Spring of 2023. To achieve the reduction objective of 35–55 wolves remaining, at least 115 wolves would need to have been removed. During RY23 only 77 wolves were removed and only 60 of those were taken by Same-Day-Airborne (SDA) efforts. This rate of wolf removal will not achieve reduction goals as wolves have high reproductive rates and harvest is likely near replacement rates.

The relatively low harvest from the SDA program was due to lower than anticipated participation by the permitted pilots. Pilots expressed that low participation in the Unit 16 program was due to having a better alternative (Unit 13) where conditions for SDA were better. Additionally, the wolves in Unit 16 had high rates of infestation of biting dog lice (50%) and the resulting poor-quality hides that reduced financial incentive to harvest those wolves.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Predator removal is a tool that can be necessary to achieve and maintain the Unit 16 moose population within objectives where public participation may not be sufficient to achieve predator reduction goals. Most other existing IM plans allow for staff to conduct IM, however when the existing Unit 16 plan was written there was a large desire by the public to be the ones to conduct control and as a result, staff participation was not part of the original IM plan. Through the years since the original plan was written the department has refined its ability to conduct precise predator removal efforts which result in a greater recovery response from prey populations.

COST ANALYSIS: Adoption of this proposal would result in significant costs to the department if department staff conduct control activities.

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PROPOSAL 76 - 5 AAC 92.085 (8) Unlawful methods and means; exceptions. Allow the take of brown bear in Unit 16B-remainder the same day airborne.

PROPOSED BY: Jon Kruger

WHAT WOULD THE PROPOSAL DO? This proposal would allow the harvest of brown bears the same day airborne in Unit 16B-remainder without requiring them to be at a permitted bait station provided they were 300 feet from the airplane.

WHAT ARE THE CURRENT REGULATIONS? The current brown bear hunting regulations can be found in 5 AAC 85.020 and in the *2023–2024 Alaska Hunting Regulations*.

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

…

Unit 16(A) 2 bears every regulatory year	July 1 – June 30	July 1 – June 30
Unit 16(B), that portion within a one-mile radius of the mouth of Wolverine Creek at 60.80° N. lat., 152.31° W. long. 2 bears every regulatory year	Sept. 15 – May 31	Sept. 15 – May 31
Remainder of Unit 16(B) 2 bears every regulatory year	July 1 – June 30	July 1 – June 30

Hunters can harvest brown bears over bait. The bear baiting seasons are July 1 – Oct. 15 and Apr. 15 – June 30. Unit 16B has a negative customary and traditional use finding for brown bears.

….

5 AAC 92.085 (8)

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

Exceptions:

- You may hunt deer the same-day-airborne (SDA; provided you are 300 feet from the airplane)
- In specified units (including Unit 16) black bears may be taken at permitted bait stations provided you are at least 300 feet from the airplane.
- In specified units (including Unit 16) brown bears may be taken at permitted bait stations provided you are at least 300 feet from the airplane.
- You may hunt black bear in Unit 16 from Oct. 1 – Aug. 9 the same day you have flown, provided you are at least 300 feet from the air.

….

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would allow bear hunters to hunt brown bears the same day they have flown in Unit 16B outside of the restricted area one mile from the mouth of Wolverine Creek. This specifically allows the practice of spotting brown bears from the air and then landing to pursue them. It will also provide the opportunity to harvest bears that were not seen from the air but were encountered the day that the hunter flew into the unit. Adoption of this proposal is expected to increase harvest of brown bears.

BACKGROUND: In 2007 line transect surveys for bears in Unit 16B showed a brown bear population of 625–1,250. The goal of the intensive management was to reduce the brown bear population to 375 brown bears on mainland 16B. Bear harvests increased initially under the program but have since returned to their pre-control levels. Modelling by the department showed that the predator control program had little effect on the brown bear population in Unit 16 and was suspended in November 2016.

As a component of the predation control program in Unit 16, SDA hunting for black bear began in 2007. At that time hunters interested in participating in the program were required to obtain a predation control permit. In addition, under that program there was no limit and permittees could take any bear including cubs and sows with cubs. SDA hunting was not allowed for brown bears during the control program except at registered bait stations.

During the control program the department did not track same-day-airborne harvest of black bears. On average during the control program 23 black bears per year were harvested by people who used airplanes for hunting, did not harvest the bear at bait, and hunted either 0 or 1 days. Circumstances for the general allowance of same-day-airborne for brown bear would be more restrictive than under the control program. SDA for black bear in 16 was approved in 2022. Under general season, an average of 19 black bears per year were harvested by people who used airplanes for hunting, did not harvest the bear at bait, and hunted either 0 or 1 days.

In Unit 16 brown bears are frequently targeted in the spring while snow allows for locating tracks and animals from the air. Snow and ice provide benefits for air access to locations that are not typically accessible to aircraft in snow free periods. During snow free periods spotting brown bears from the air in locations that are conducive to landing planes would be limited as most of the unit is either heavily forested or swamp. Due to the remote nature of the unit many people use aircraft for accessing their residence and camps. This proposal would allow them to harvest brown bears the day they arrive likely without using the aircraft for locating the brown bears.

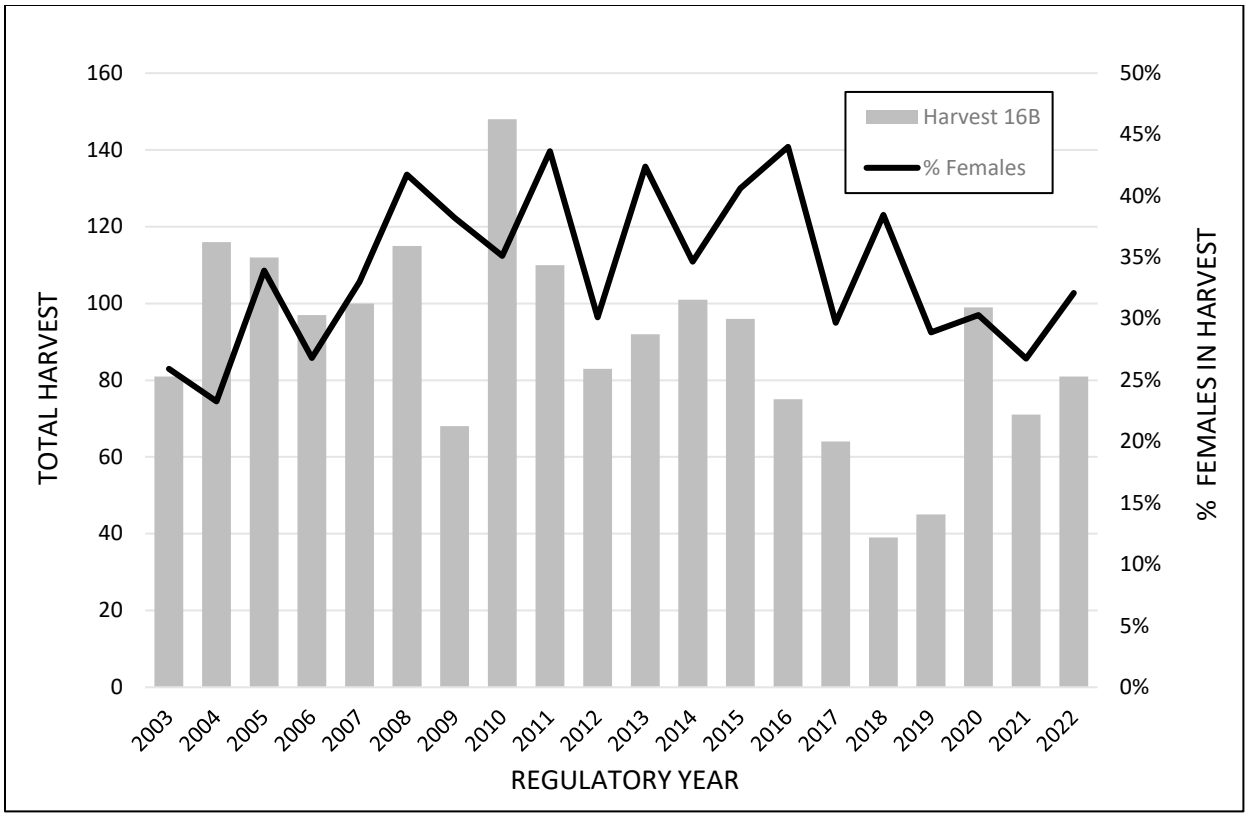

Figure 76-1. Unit 16B brown bear harvest and percent females in harvest, RY2003–2022.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it has not identified a biological concern for bears in Unit 16B-remainder.

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

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PROPOSAL 77 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Extend the brown bear hunting season in Unit 14B.

PROPOSED BY: Matanuska Valley Advisory Committee

WHAT WOULD THE PROPOSAL DO? Extend the brown bear season in Unit 14B by 15 days from May 31 to June 15.

WHAT ARE THE CURRENT REGULATIONS? Unit 14B is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current bear hunting regulations can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Hunting Regulations*.

Unit 14B regulations allow 1 brown bear every regulatory year between August 1–May 31 and may be taken over a black bear bait station. Baiting season for black bears is April 15–June 30.

In Unit 14B no baiting is allowed within one-quarter mile of the shorelines of the Susitna River, and the Little Susitna River, south of the Parks Highway bridge. In less developed areas, more remote areas of the region (i.e., Units 11 &13) where brown bear densities are likely higher, seasons extend until the end of June and allow the taking of brown bears at bait stations.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide hunters with an additional 15 days added to the end of the current brown bear season extending it from May 31 to June 15. Brown bears can be harvested at black bear bait stations in this area. The adoption of this proposal is expected to result in an increased harvest of brown bears. This proposal would not result in additional conflicts with bear baiters as the black bear baiting season already extends to June 30.

BACKGROUND: The brown bear management objective for Units 14A & 14B combined is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from Regulatory Year (RY)13–RY22 in 14B was 12 bears and the average percent of males was 60% (Figure 77-1).

Brown bear in this unit are difficult to survey because the unit is heavily forested and other methods have yet to be used to develop an estimate, so the department has used surrogates of abundance such as harvest, number of nuisance bear complaints, and number of bear killed under defense of life and property (DLP). On average less than 1 brown bear in the unit is killed under DLP.

Taking brown bears at black bear bait stations became legal in Unit 14B in RY15. Since that time, an average of 86% of bears taken in the spring have been taken over bait. The harvest chronology in Unit 14B shifted from being relatively concentrated in the fall season to being skewed toward the second half of May in RY18, after taking of brown bears at bear bait stations became legal in this unit (Table 77-1).

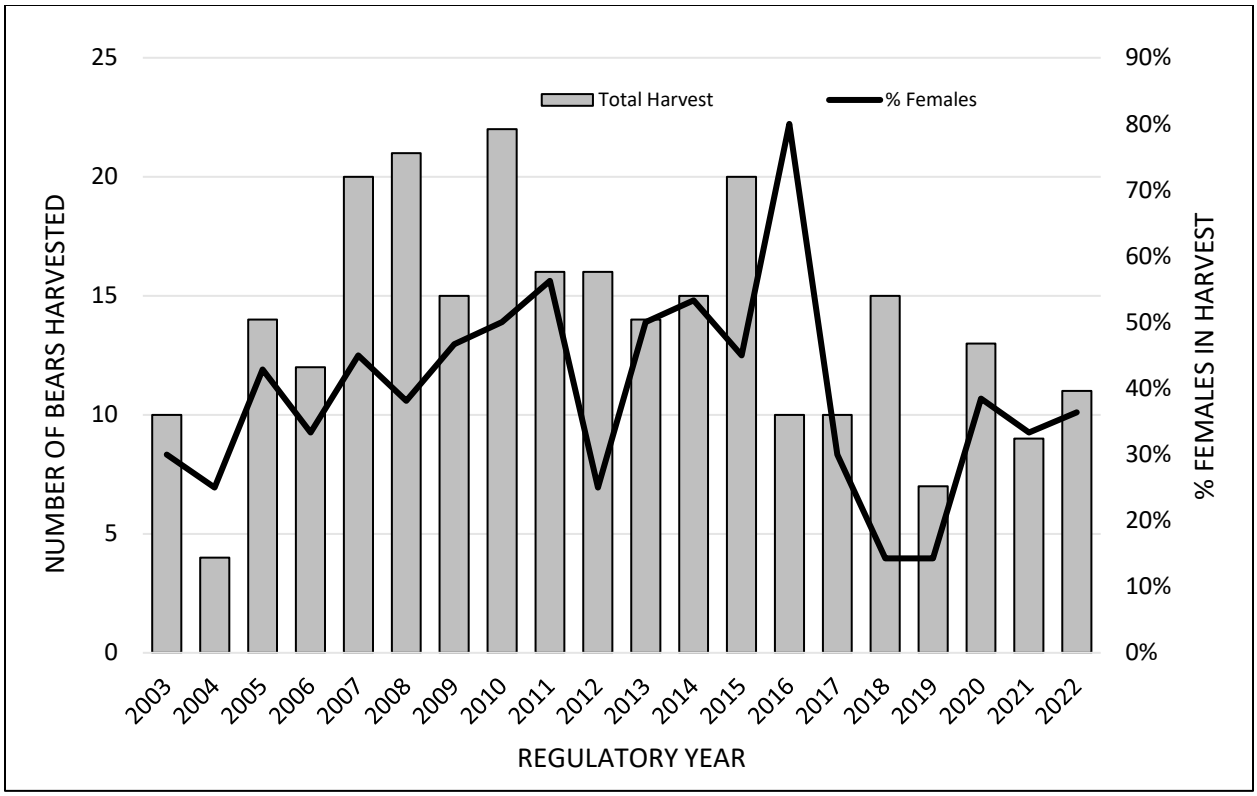

Figure 77-1. Unit 14B total brown bear harvest and percent female in harvest, RY2003–2022.

Table 77-1. Chronology of the harvest of brown bears in Unit 14B, RY2018–2022.

	July	August		September		October	May		June	
Reg. Year	1–31	1–15	16–31	1–15	16–30	–April	1–15	16–31	1–30	Total
RY18	7%	7%	20%	13%	7%	0%	0%	47%	0%	15
RY19	0%	0%	14%	29%	29%	14%	0%	14%	0%	7
RY20	8%	0%	23%	0%	31%	15%	15%	8%	0%	13
RY21	0%	0%	0%	11%	11%	33%	0%	33%	11%	9
RY22	9%	9%	0%	18%	27%	9%	9%	18%	0%	11

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it has not identified a biological concern for bears in Unit 14B. Adoption of this proposal is expected to increase harvest of brown bears, and aligning the brown bear season with the black bear season reduces regulatory complexity for hunters.

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

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PROPOSAL 78 – 5 AAC 92.039. Permit for taking wolves using aircraft; 5 AAC 92.085. Unlawful methods of taking big game; exceptions; 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions; Allow the same day airborne take of wolves in the active Unit 16 Intensive Management area.

PROPOSED BY: Greg Nelson

WHAT WOULD THE PROPOSAL DO? This proposal would allow people who possess a hunting or trapping license to harvest wolves with a firearm the same day that they have flown in an airplane within the active Unit 16 Intensive Management (IM) area, provided they are 300 feet from the airplane.

WHAT ARE THE CURRENT REGULATIONS?

16.05.783. Same day airborne hunting. (a) a person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne. However, the Board of Game may authorize a predator control program that allows airborne or same day airborne shooting. ….

5 AAC 92.039. Permit for taking wolves using aircraft. (a) a person may not use an aircraft to land and shoot a wolf without first obtaining a permit from the department. (b) a person may not use an aircraft to take a wolf by aerial shooting without first obtaining a permit from the department. (c) a person may not use a helicopter for helicopter trapping of wolves without first obtaining a permit from the department. ….

5 AAC 92.085. Unlawful methods of taking big game. …. (8) a person who has been airborne may not use a firearm to take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. on the day following the day in which the flying occurred, ….

5 AAC 92.095. Unlawful methods of taking furbearers. …. (8) a person who has been airborne may not use a firearm to take or assist in taking a wolf or wolverine until after 3:00 a.m. on the day following the day in which the flying occurred; ….

There is a positive C&T finding for wolves in Unit 16 outside of the nonsubsistence area with an ANS of 0-5 wolves.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted anyone who possess a hunting or trapping license may participate in wolf harvest with a firearm the same day that they have flown (SDA) within active Unit 16 IM areas provided that they are 300 ft. from the aircraft. Taking wolves the same day a person has been airborne is only allowed under the conditions of a permit as part of a control program.

BACKGROUND: By statute, [AS 16.05.783 (a)] allowing the take of wolves using an aircraft SDA, can only be authorized where a predator control program, as part of Intensive Management, has been adopted. There is an active IM plan for wolves in Unit 16 under 92.122 that identifies predation by wolves (and bears) is an important cause of not achieving moose harvest and population objectives.

Current SDA programs require the department to permit pilots and gunners to participate. The department approves pilots on a limited basis based on pilot experience and having participated in an SDA program previously for concerns of safety and increased tracking of the program.

DEPARTMENT COMMENTS: The board does not have the authority to allow what the proponent is requesting because statute prohibits the take of wolves the same day a person has been airborne unless under the conditions of a permit issued as part of an intensive management program.

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

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PROPOSAL 79 - 5 AAC 84.270 Furbearer trapping. Extend the wolf trapping season in Unit 14A.

PROPOSED BY: Michael Gozdor II

WHAT WOULD THE PROPOSAL DO? This proposal would extend the wolf trapping season in Unit 14A by 30 days from the current date of November 10–March 31 to November 10–April 30.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. Current regulations can be found in 5 AAC 84.270 and in the *2024–2025 Alaska Trapping Regulations*.

5 AAC 84.270

Species and Units	Open Season	Bag Limit
(13) Wolf		
…		
Units 6, 11, 14(A), and 18	Nov. 10 – Mar. 31	No limit.
…		
Units 14(B) and 17	Nov. 10 – Apr. 30	No limit.

Units 12, 13, and 16	Oct. 15 – Apr. 30	No limit.

…

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, trappers would have an additional 30 days to trap wolves in Unit 14A which would likely increase wolf harvest. The current hunting season allows for the take of wolves during the proposed dates, without the use of traps or snares. Extending the trapping season is not expected to increase wolf harvest but could potentially result in the incidental trapping of other species. In addition, this proposal would align the end of wolf trapping season in Unit 14A with adjacent Units 14B and 16, simplifying the regulations.

BACKGROUND: The trapping season extends through April 30 in all other units of Central-Southwest Region IV except for Units 11 and 14A. Wolf seasons have remained unchanged in 14A since 1981. Wolf harvest in Unit 14A has averaged 5 per year for the last 10 years. The peak harvest in a year is 10 and the lowest annual harvest is 0 (Figure 79-1). Wolf harvest in 14A remains relatively low due to the wolf population being maintained at relatively low density due to high human use of the area.

Wolf harvest chronology in Units 14A, 14B, and 16 indicates that there is a significant pulse of harvest during the fall hunting season in August and September. The peak harvest occurs in January and remains high in February then declines in March and further in April.

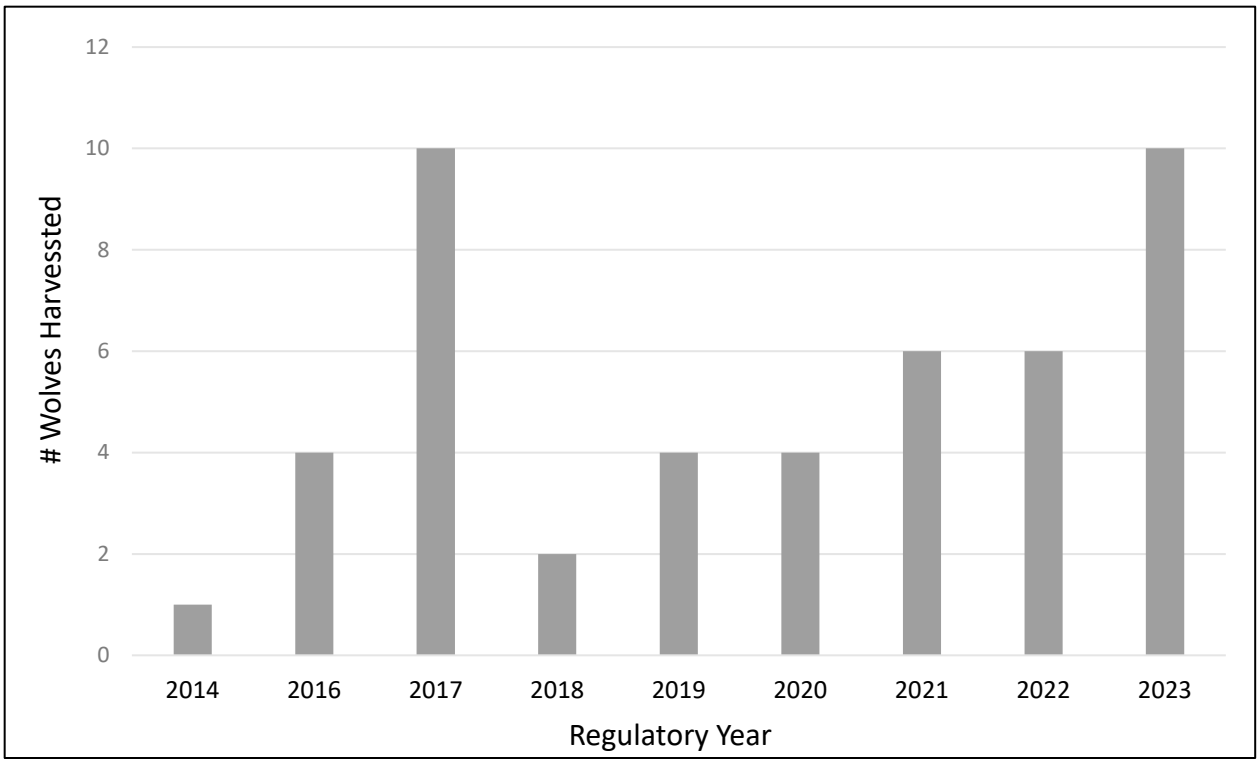

Figure 79-1. Unit 14A Wolf harvest, RY2014–2023.

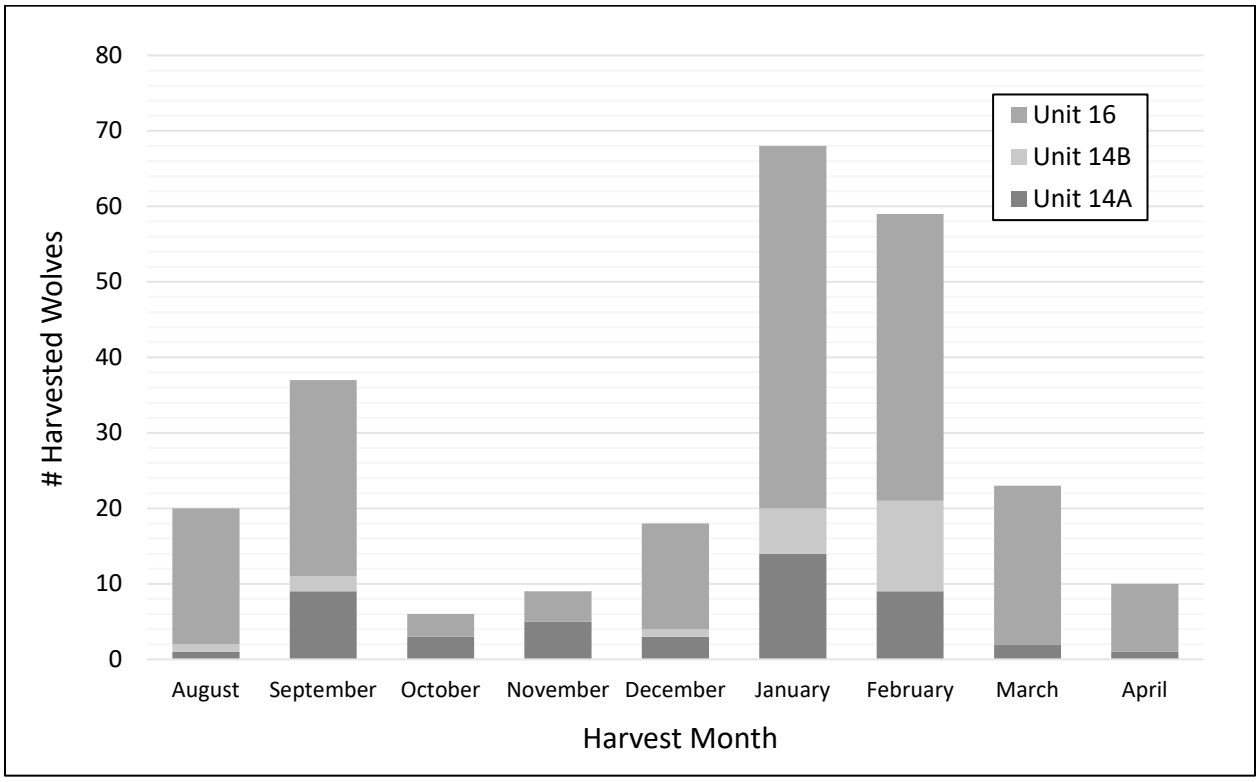

Figure 79-1. Chronology of wolf harvest in Units 14A & B and 16, RY2014–2023.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because there is currently no biological concern for wolves in Unit 14A, and the proposal reduces regulatory complexity by aligning seasons within the Central-Southwest Region IV. If adopted, this proposal is not expected to increase wolf harvest substantially.

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

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Proposal 80

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PROPOSAL 81 - 5 AAC 92.095 Unlawful methods of taking furbearers. Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours.

PROPOSED BY: Kneeland Taylor

WHAT WOULD THE PROPOSAL DO? If adopted this proposal it would require all traps and snares for all species of furbearers within 2 miles of publicly maintained roads in Unit 14A to be checked at regular intervals not exceeding 36 hours.

WHAT ARE THE CURRENT REGULATIONS? Unit 14A is within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current trapping regulations for Unit 14A can be found in 5 AAC 85.020 and in the *2024–2025 Alaska Trapping Regulations*.

Currently, there are no time-dependent requirements to check traps in Central-Southwest Region IV. The only trap check requirement in Alaska is in Unit 1C (Gustavus area), which requires traps to be checked every 3 days (72 hours).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All traps or snares that are set within 2 miles of publicly maintained roads in Unit 14A would be required to be checked every 36 hours (1.5 days). This timeframe for trap checking would require that trappers check their traps every day and would likely decrease trapper effort substantially as well as hinder trapping success by increasing human scent/activity along a trapline.

BACKGROUND: Trapping has been a tradition and economic lifestyle of Alaskans since before statehood. The goal of trapping is to harvest furbearers for their pelts. Trappers have options such as killer-style traps, snares, hanging sets, and drowning sets that quickly kill captured animals. Trappers use techniques including the time interval of checking traps to achieve optimal catch rates as well as optimal quality of hides.

It will be difficult for trappers to visit their trap sites every 36 hours. Although this proposal limits the requirement to within 2 miles of maintained roads, many trappers begin at a road but travel many miles on foot or snowmachine to complete a trapline. Those who do not rely on trapping as a full-time profession will find it nearly impossible to check traps daily as many traplines are in remote areas. Often weather conditions prevent reliable travel even on publicly maintained roads during the trapping season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative in nature. This proposal will create an obstacle to trapping and will likely have a profound impact on the way trappers have operated in the past. A daily trap check requirement will reduce trapping effort. The department is opposed to unnecessary reductions in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics. If adopted, there may be an expectation of the department to provide a definition of publicly maintained roads, and requests for maps indicating such roads and a visual presentation of a two mile buffer. The department does not maintain this type of information.

COST ANALYSIS: Adoption of this proposal may result in additional costs to the department if directed to provide maintained road and two mile buffer information.

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PROPOSAL 82 - 5 AAC 92.550. Areas closed to trapping. Require 50-yard trapping setbacks from known multi-use trails in Units 14A and 14B.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? The proposal would require all traps set within 50 yards of the following "multi-use" trails be:

- elevated at least 3 feet above hard ground,
- enclosed,
- under water; or
- under ice.

Talkeetna Area (Mat-Su Borough)

- Talkeetna Lakes Park trail system (XYZ Lakes trails)
- Dorothy Jones Trail System (Susitna Valley High School)

Matanuska Lakes State Recreation Area (State)

- All developed trails

Palmer Hay Flats (State)

- Scout Ridge Loop

- Reflections Lake Trail
- Nelson Road
- Rabbit Slough Boat Launch Access Road
- Wasilla Creek Boardwalk (Nelson Road)

Hatcher Pass Area (State)

- Government Peak Recreation Area developed trails system within the southern development area
- Independence Mine Ski Trails
- Gold Mint Trail to Mint Glacier
- Reed Lakes Trail to Lower Reed Lake
- Archangel Road to the gate

WHAT ARE THE CURRENT REGULATIONS? Units 14A and B are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area. The current areas closed to trapping in Alaska are listed in 5 AAC 92.550 but there are no areas listed in Unit 14A or 14B.

Area-specific state, federal, and municipal trapping restrictions occur throughout Alaska. The department does not maintain a catalogue of municipal or private land restrictions. The trails identified in this proposal in Talkeetna are not state trails or on state land.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would make it illegal to trap within 50 yards of specific multi-use trails in Unit 14A and 14B unless the traps were elevated 3 feet above ground, under water, under ice, or enclosed, allowing trapping to still take place while decreasing the risk of conflicts with pet owners. The proposal may result in decreased opportunity to take furbearers. Conflicts between user groups are not recorded and the extent is unknown.

BACKGROUND: Ethical and safe trapping practices are actively encouraged and taught throughout the state by private trapping associations. The department relies heavily upon the experience and collaboration of local trappers to pursue and deal with furbearers that people may have conflicts with.

Many trails that trappers have historically used in the Mat-Su were originally established by trappers and over time use has diversified as development and the human population has expanded. Many of these same areas have regulations under different authorities to restrain pets to minimize user conflicts and for safety. The department does not maintain a record of pets caught in traps and reporting is inconsistent. Some reports in the Mat-Su indicate that incidents occurred on or near multi-use trails or trailheads, along with some on private land.

This proposal is the result of a BOG-directed public stakeholder meeting that occurred on February 14, 2022. The meeting was facilitated by the board, and attended by representatives from Alaska Wildlife Alliance, local trappers associations, and department staff.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is primarily allocative. The department is generally opposed to a reduction in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics. Similar proposals have been adopted by the board in other areas of the state (e.g., Juneau trails) with unknown results in reducing conflicts.

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

****

PROPOSAL 83 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Extend the spring hunting season for ptarmigan in Unit 16.

PROPOSED BY: Jonathon Green

WHAT WOULD THE PROPOSAL DO? This proposal would extend the ptarmigan hunting season in Unit 16 by an additional 30 days from March 31 through April 30.

The proposal lists two potential options:

1. August 10 – April 30, while maintaining the bag limit of 10 ptarmigan per day, 20 in possession.

OR

2. August 10 – March 31, with a bag limit of 10 ptarmigan per day, 20 in possession, decreasing to 5 ptarmigan per day, 10 in possession from April 1 – April 30.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

…

Units and Bag Limits	**Resident & Nonresident Open Season (Subsistence & General Hunts)**
Unit 16, 10 per day, 20 in possession	Aug. 10 – Mar. 31

…

There is a positive customary and traditional use (C&T) finding for ptarmigan in Unit 16 outside of the nonsubsistence area. The Board of Game (board) has not set an amount reasonably necessary for subsistence (ANS). Unit 16A is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase hunting opportunity and potentially harvest during the spring breeding period for ptarmigan within Unit 16.

BACKGROUND: The current hunting season length for ptarmigan has been in place in Unit 16 since 1990 (34 years). Since 1990, bag limits in Unit 16 have changed once (last bag limit change was in 1997). Outside of Unit 16, the majority of other units that have seasons extending through or beyond the month of April are either completely off the road system or away from major human population centers. The exceptions being Units 12, 20, and 25C, where in 2004 the board gave the department the authority to adjust season dates and bag limits by emergency order. Since 2004 late-season (March 1–April 30) bag limits in Units 12, 20, and 25C have been reduced from 20 to 5 per day and from 40 to 10 in possession to protect the breeding population of ptarmigan in accessible areas within those units.

Voluntarily submitted hunter-harvested ptarmigan samples from across the state (RY2011–2023) suggest harvest is high in the fall, relatively low during the winter, followed by an increase in the spring. The increase in harvest in the spring coincides with the return of longer days and warmer temperatures and generally good snow conditions for snowmachine travel. Specific to Unit 16 (All subunits; RY2011–2023), roughly 17% of the hunter-harvested ptarmigan samples submitted came from the month of March. While the department does not receive nearly as many wings from this unit as from nearby Unit 13, late-season harvest would likely continue at high levels if the season were extended through the month of April.

This proposal presents two different harvest scenarios for consideration: one maintaining the same bag limit (10 per day, 20 in possession) through the entirety of the season, and a second providing a reduced bag limit (5 per day, 10 in possession) through the month of April. While a reduced bag limit scenario may seem like a logical compromise for extending the hunting season into the breeding season, two separate small game hunter surveys showed the average daily ptarmigan harvest per hunter in Unit 13 (a nearby unit with substantial harvest pressure) was less than 2 ptarmigan per day. This suggests a daily bag limit reduction from 10 per day to 5 per day for the month of April likely would not offset the concentrated harvest and effort introduced by extending the season another 30 days.

Research from a department study on willow ptarmigan in Unit 13E between 2013 and 2015 identified reduced survival rates for ptarmigan at road-accessible sites in comparison to birds at remote sites in the fall (Aug. – Nov.), but no difference in survival rates after birds had dispersed

from breeding sites (both remote and accessible) in the winter (Dec. – Mar.). Similarly, a department study on rock ptarmigan in Unit 13B between 2013 and 2017, found a higher risk of mortality for birds ≤ 1.9 mile from a road during the fall in comparison to birds ≥ 1.9 miles from a road. Both willow and rock ptarmigan captured during these studies showed strong site fidelity to breeding locations along the Denali Highway and at more remote locations. These findings, along with the data from hunter-harvested samples, support the concept of high harvest taking place at road-accessible locations in the fall and suggest a similar outcome will occur if seasons extend too far into the spring breeding period.

Because by mid-April ptarmigan are already establishing and defending breeding territories, late-season harvest mortality is likely additive (i.e., adds additional mortality beyond what is expected naturally) and would likely lead to reduced spring breeding densities. Consequently, increasing the amount of late-season harvest, may result in localized depletion, and particularly at accessible sites near roads. Recent regulatory changes to address localized depletion within nearby Units 13B and 13E, resulted in shortened season lengths in 2018 due to low relative abundance estimates from along the Denali Highway corridor. Furthermore, in recognition of these changes, the Federal Subsistence Board passed a Special Action Request proposed by the Denali Regional Advisory Council in the fall of 2019, aligning federal subsistence seasons with the revised state season dates.

Extending ptarmigan hunting seasons further into the spring breeding period of the annual lifecycle of ptarmigan may be less concerning in areas with minimal or no road access and low human harvest pressure. However, the department expects substantial harvest may occur within road-accessible areas near large human population centers, which includes Unit 16.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposed ptarmigan season extension in Unit 16. If this proposal were adopted, it would provide an additional 30 days of ptarmigan hunting within Unit 16, at the potential cost of reducing breeding densities around areas accessible from the road and trail systems.

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

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PROPOSAL 84 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Extend the spring hunting season for ptarmigan in Units 14A and 14B.

PROPOSED BY: Jonathon Green

WHAT WOULD THE PROPOSAL DO? This proposal would extend the ptarmigan hunting season in Units 14A and 14B by an additional 30 days from March 31 through April 30.

The proposal lists two potential options:

1. August 10 – April 30, while maintaining the bag limit of 10 ptarmigan per day, 20 in possession.

OR

2. August 10 – March 31, with a bag limit of 10 ptarmigan per day, 20 in possession, decreasing to 5 ptarmigan per day, 10 in possession from April 1 – April 30.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

…

Units and Bag Limits	**Resident & Nonresident Open Season (Subsistence & General Hunts)**
Unit 14A, 14B, 10 per day, 20 in possession	Aug. 10 – Mar. 31

…

Unit 14 is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence use area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase hunting opportunity and potentially harvest during the spring breeding period for ptarmigan within Units 14A and 14B.

BACKGROUND: The current hunting season length for ptarmigan has been in place in Units 14A and 14B since 1990 (34 years). Since 1990, bag limits in these units have changed once (last bag limit change was in 1997). Outside of Units 14A and 14B, the majority of other units that have seasons extending through or beyond the month of April are either completely off the road system or away from major human population centers. The exceptions being Units 12, 20, and 25C, where in 2004 the board gave the department the authority to adjust season dates and bag limits by emergency order. Since 2004 late-season (March 1–April 30) bag limits in Units 12, 20, and 25C have been reduced from 20 to 5 per day and from 40 to 10 in possession to protect the breeding population of ptarmigan in accessible areas within those units.

Voluntarily submitted hunter-harvested ptarmigan samples from across the state (RY2011–2023) suggest harvest is high in the fall, relatively low during the winter, followed by an increase in the spring. The increase in harvest in the spring coincides with the return of longer days and warmer temperatures and generally good snow conditions for snowmachine travel. Specific to Unit 14 (All units; RY2011–2023), roughly 32% of the hunter-harvested ptarmigan samples submitted came from the month of March. While not as clear of a pattern exists as in nearby Unit 13, late-season harvest would likely continue at high levels if the season were extended through the month of April.

This proposal presents two different harvest scenarios for consideration: one maintaining the same bag limit (10 per day, 20 in possession) through the entirety of the season, and a second providing a reduced bag limit (5 per day, 10 in possession) through the month of April. While a reduced bag limit scenario may seem like a logical compromise for extending the hunting season into the breeding season, two separate small game hunter surveys showed the average daily ptarmigan harvest per hunter in Unit 13 (a nearby unit with substantial harvest pressure) was less than 2 ptarmigan per day. This suggests a daily bag limit reduction from 10 per day to 5 per day for the month of April likely would not offset the concentrated harvest and effort introduced by extending the season another 30 days.

Research from a department study on willow ptarmigan in Unit 13E between 2013 and 2015, identified reduced survival rates for ptarmigan at road-accessible sites in comparison to birds at remote sites in the fall (Aug. – Nov.), but no difference in survival rates after birds had dispersed from breeding sites (both remote and accessible) in the winter (Dec. – Mar.). Similarly, a department study on rock ptarmigan in Unit 13B between 2013 and 2017, found a higher risk of mortality for birds ≤ 1.9 miles from a road during the fall in comparison to birds ≥ 3 km from a road. Both willow and rock ptarmigan captured during these studies showed strong site fidelity to breeding locations along the Denali Highway and at more remote locations. These findings, along with the data from hunter-harvested samples, support the concept of high harvest taking place at road-accessible locations in the fall and suggest a similar outcome will occur if seasons extend too far into the spring breeding period.

Because by mid-April ptarmigan are already establishing and defending breeding territories, late-season harvest mortality is likely additive (i.e., adds additional mortality beyond what is expected naturally) and would likely lead to reduced spring breeding densities. Consequently, increasing the amount of late-season harvest, may result in localized depletion, and particularly at accessible sites near roads. Recent regulatory changes to address localized depletion within nearby Units 13B and 13E, resulted in shortened season lengths in 2018 due to low relative abundance estimates from along the Denali Highway corridor. Furthermore, in recognition of these changes, the Federal Subsistence Board passed a Special Action Request proposed by the Denali Regional Advisory Council in the fall of 2019, aligning federal subsistence seasons with the revised state season dates.

Extending ptarmigan hunting seasons further into the spring breeding period of the annual lifecycle of ptarmigan may be less concerning in areas with minimal or no road access and low human harvest pressure. However, the department expects substantial harvest may occur within road-accessible areas near large human population centers, which includes Units 14A and 14B.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If this proposal were adopted, it would provide an additional 30 days of ptarmigan hunting within these Units, at the potential cost of reduced breeding densities around areas accessible from the road and trail systems.

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

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END