

Statewide Regulations Meeting

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ALASKA BOARD OF GAME
Statewide Regulations Meeting
Evan Civic and Convention Center
March 21-28, 2025

TENTATIVE AGENDA

Note: This Tentative Agenda is subject to change throughout the course of the meeting. It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

Friday, March 21, 8:30 a.m.

OPENING BUSINESS

Call to Order / Purpose of Meeting

Introductions of Board Members and Staff

Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting. Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

Saturday, March 22, 8:30 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

Sunday, March 23, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

Monday, March 24 thru Thursday, March 27, 8:30 a.m.

BOARD DELIBERATIONS continued

Friday, March 28, 8:30 a.m.

BOARD DELIBERATIONS continued/conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

Agenda Notes

1. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
2. A live audio stream for the meeting is intended to be available at: <https://boardofgame.adfg.alaska.gov>
3. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-4110 no later than two weeks prior to start of the meeting to make any necessary arrangements.

Migratory Bird Hunting

PROPOSAL 85

5 AAC 92.013 Migratory bird hunting guide services.

Change the definition for migratory bird hunting guide services to include transporter services as follows:

5 AAC 92.013 Migratory bird hunting guide services.

...

(c) For purposes of this section,

(1) “migratory bird hunting guide” means a person who provides migratory bird hunting guide services;

(2) “migratory bird hunting guide services” means to assist **or transport**, for compensation or with the intent to receive compensation, a migratory bird hunter to take or attempt to take migratory birds by accompanying, **transporting**, or personally directing the hunter in migratory bird hunting activities:

(3) “person” includes a business entity **or affiliated services such as water taxi, air taxi, fishing charter outfitters; combo hunting/fishing boats; or lodges; when serving small game hunters to, from, or in the field; their equipment; or migratory birds harvested.**

What is the issue you would like the board to address and why? There are many different migratory bird hunting guide services not providing registration forms required by the department under 5 AAC 92.013 for basic information on who and where commercially compensated migratory bird hunting services are taking place.

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

PROPOSED BY: Nancy Hillstrand (EG-F24-062)

PROPOSAL 86

5 AAC 92.010. Harvest tickets and reports.

Require mandatory harvest reporting of sea ducks as follows:

I propose a mandatory harvest reporting of sea ducks in Alaska.

ADF&G should monitor changes in sea duck harvest through a regulation requiring sea duck harvest reporting. New management language could include:

- Required possession a paper or electronic harvest record card for sea ducks.
- After taking a sea duck into possession, required recording of all information on the harvest record card or through a mobile application.
- Consequences for not reporting.

Language could be modeled on the State of Washington’s management approach through Washington Admin. Code § 220-416-060 - 2023-2024, which reads: “Hunters must physically possess a special 2023-2024 paper or electronic hunting authorization and harvest record card for sea ducks when hunting scoter, long-tailed duck, and goldeneye in Western Washington. Immediately after taking a sea duck into possession, hunters must record all required information on the harvest record card. Hunters required to physically possess a paper harvest record card must enter all required information in ink. Hunters required to physically possess an electronic harvest record card must enter all required information through the licensing mobile application.”

What is the issue you would like the board to address and why? Accurate sea duck harvest numbers are needed to assure hunt opportunities now and in the future. Alaska’s current migratory bird harvest reporting system, known as HIP, uses randomized voluntary reporting and provides only slim and spotty information. As a result, Alaska has never adjusted bag limits on the basis of HIP reporting, according to ADF&G managers.

Alaska does not currently require sea duck harvest reporting, since sea ducks are classified as small game. Harvest reporting isn’t typically required for small game, because, in general, these species are evolved to recover quickly from big drops in population. But sea ducks are special and they do not recover quickly, which means there are long-term negative effects of over-harvest. According to the Sea Duck Joint Venture, populations are slow to recover for the following reasons:

1. Sea ducks are known to have a remarkable degree of site fidelity—around 5 miles or so—which means that if an area’s population is depressed, birds from other areas will not boost recovery.
2. In general, sea ducks do not breed until they are 2 or 3 or so years old, which is late in comparison darling ducks.
3. They lay only one clutch of eggs per year, in contrast with the 2 or 3 for many dabbling ducks.
4. They have significantly lower chick survival rates than other ducks.

Sea duck populations across the United States have fallen 30% since 1970, and they remain in decline, according to the U.S. Committee of the North American Bird Conservation Initiative’s “2022 State of Birds Report”. On the bright side, the report notes that efforts at conservation have been shown to be effective. This proposal is supported by three consecutive years of Kachemak Bay Community Science Sea Duck Surveys—a local annual effort of 10 boats and over 30 people. This survey effort started in 2020/21, because residents and hunters in Kachemak Bay noticed a significant increase to sea duck hunting pressure, as a result of the arrival of a few more guides. Local birders began monitoring populations to create a population index. Our population index does not aim to estimate total number of birds in Kachemak Bay, but by focusing on a few areas with dense sea duck populations, we are able to see population trends—an approach used by

ADF&G managers across many species in Alaska. Our data shows that populations have not bounced back after a significant harvest. Fish and Game has historically monitored sea duck populations in Kachemak Bay, but they have not surveyed in Kachemak Bay since several years before community science surveys began, so our data is the only record of this trend.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was submitted at the 2022 the Southcentral Board of Game meeting with support from the Homer AC. At that time, the BOG recommended that it be resubmitted as a statewide proposal.

PROPOSED BY: Penelope Haas (HQ-F24-030)

PROPOSAL 87

5 AAC 92.100. Unlawful methods of hunting waterfowl, snipe, and cranes.

Restrict the use of boats for hunting waterfowl as follows:

5 AAC 92.100. Unlawful methods of hunting waterfowl, snipe, and cranes.

(a) The following methods and means of taking waterfowl, snipe, and cranes are prohibited, in addition to the prohibitions in 5 AAC 92.080:

(1) with a rifle or pistol, a shotgun larger than 10 gauge, or a shotgun not plugged to a three shell capacity;

(2) from a motor-driven boat unless the motor has been completely shut off and the boat's progress from the motor's power has ceased;

(3) from any mechanical vehicle; however, a power or sailboat may be used only as a direct means of retrieving a dead or injured bird; **all boats shall remain stationary throughout the duration of the hunt, beached or anchored, within 100 yards of those discharging firearms to eliminate driving, herding, or chasing migratory birds into hunters on land, or on other boats.**

What is the issue you would like the board to address and why? While use of a moving vessel is legal for retrieval of dead or crippled waterfowl, this exception is used to justify continual movement of affiliated vessels during a hunt resulting in illegal driving, herding, or chasing migratory birds into single or multiple hunter parties on shore, or on other boats.

Consistent with resource conservation, please remove loopholes that invalidate fair chase purposes of 5 AAC 92.100 Unlawful methods of hunting waterfowl snipe and cranes.

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

PROPOSED BY: Nancy Hillstrand (EG-F24-066)

Cultural Permits

PROPOSAL 88

5 AAC 92.034. Permit to take game and use game for cultural purposes.

Add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Department of Fish and Game as follows:

The commissioner may issue a permit for the taking, and use within this state, of game for the teaching and preservation of historic or traditional Alaskan cultural practices, knowledge, and values, only under the terms of a permit issued by the department upon application. A permit may not be issued if the taking of the game can be reasonably accommodated under existing regulations. For purposes of this section, "game" includes

- (1) deer;
- (2) moose;
- (3) caribou;
- (4) black bear;
- (5) mountain goat;
- (6) small game;
- (7) furbearers;
- (8) any migratory bird for which a federal permit has been issued; and
- (9) musk oxen in Unit 18;

(10) wood bison

What is the issue you would like the board to address and why? On April 2, 2024, the Commissioner announced that ADF&G will reintroduce wood bison to the Minto Flats State Game Refuge in summer of 2024. In the announcement, the commissioner articulates the desire of the state to continue developing ways in which residents of local communities might be involved in the bison restoration project. As articulated in ADF&G's Spring 2023 news release, "This restoration isn't just about ecological conservation; it's about enhancing the cultural, economic, and social fabric of our state, enriching the lives of its people and communities."

A regulatory response is needed to protect Alaskan cultural practices, knowledge, and values. In regions where bison's cultural significance now exists predominantly in story form, such as Fort Yukon, testimonies shed light on ancestral knowledge that has simply not been practiced for over a generation now, but tradition still exists. Despite historical disruptions like boarding schools and cultural loss, the resurgence of wood bison offers a tangible opportunity for reconnection and revitalization.

In other communities such as Minto, Nenana, and Manley surrounding the Lower Tanana lands in which the new herd is to be released, less oral tradition exists and any ceremonial or cultural practices that Tribes once engaged in is minimal. However, Alaska Native values are based around adaptivity - adaptivity to the seasons, the land, changes to the environment and ecosystem, and abundance of the landscape. Cultural traditions are based on what the land provides and relationship to species or resources. As the environment and resources of the land, management decisions, and climate to evolve, so will Alaskan cultural practices and knowledge. Regulation must evolve at the same rate.

This proposal embraces the adaptive nature of Alaska Native values, and recognizes the evolving landscape of ceremonial practices. Including regulatory language, empowers Tribes and communities to preserve traditions using both established and newly introduced species in ceremonies and practices. Adding “wood bison” to 5AAC 92.034 honors Alaskan cultural practices and knowledge. It upholds honoring Alaska Native traditions, revitalizing cultural practices, and fostering a deeper connection to our shared heritage. The inclusion of wood bison represents the profound cultural and educational opportunities that Wood Bison present for the transference of both new and ancestral knowledge and skills.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed by the Minto-Nenana Fish and Game Advisory Committee with involvement from Tanana- Rampart-Manly Advisory Committee members and ADF&G staff.

PROPOSED BY: Minto-Nenana Fish and Game Advisory Committee and Tanana Chiefs Conference (HQ-F24-044)

Hunter Education Requirements

PROPOSAL 89

5 AAC 92.003. Hunter education and orientation requirements.

Require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second degree of kindred as follows:

Amend hunter education requirements for nonresident hunters as follows:

92.003 Hunter education and orientation requirements.

(c) A nonresident hunter [in Unit 17(B)] must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose [or] **and** must be accompanied by a registered guide or resident family member within the second degree of kindred.

[(d) A nonresident hunter in Unit 19(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or caribou or must be accompanied by a registered guide or resident family member within the second degree of kindred.]

What is the issue you would like the board to address and why? Currently, all adult Alaskan residents under the age of 39 must successfully complete a certified hunters education course in order to hunt in Units 7, 13, 14, 15, and 20 under

5 AAC 92.003. Hunter education and orientation requirements. A person born after January 1, 1986 that is

(1) required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 7, 13, 14, 15, and 20

Whereas nonresident hunters are afforded the option to forgo a certified hunters education course (including trophy recognition and meat care) under

(2)(c) A nonresident hunter in Unit 17(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or must be accompanied by a registered guide or resident family member within the second degree of kindred.

(d) A nonresident hunter in Unit 19(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or caribou or must be accompanied by a registered guide or resident family member within the second degree of kindred.

As such, nonresidents are legally sanctioned to sidestep hunters' education (including trophy recognition and meat care) so long as they are accompanied by a registered guide or resident family

member within second degree of kindred. Whereas adult Alaskan residents are not provided with this option to hunt in Units 7, 13, 14, 15, and 20.

Whereas the Board of Game must provide that the subsistence taking of moose, deer, elk, and caribou by residents has preference over taking by nonresidents under:

Sec. 16.05.255. Regulations of the Board of Game; management requirements

(d) Regulations adopted under (a) of this section must provide that, consistent with the provisions of AS 16.05.258, the taking of moose, deer, elk, and caribou by residents for personal or family consumption has preference over taking by nonresidents.

Additionally, nonresidents are required to be accompanied by a registered guide or resident family member within second degree for brown bear, grizzly bear, mountain goat, or sheep hunting under **Sec. 16.05.407. Nonresident hunting big game animals must be accompanied.** While **Sec. 16.05.407** does not apply for the taking of moose or caribou, it also does not prevent the board from doing so.

Moreover, residents born before January 1, 1986, are not required to complete a hunters education course. Therefore, hunts where nonresident hunters are accompanied by a 39-year-old or older family member (within the second degree of kindred), neither have received formal training in firearms safety, wildlife conservation, and respect for Alaska’s natural resources, landowners, and other hunters. Requiring nonresident hunters to take a hunters education course (including trophy recognition and meat care) provides them with the maximum safety and education.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I worked with members of the public and received feedback from ADFG staff.

PROPOSED BY: Janessa Newman and Charlie Wright (EG-F24-099)

PROPOSAL 90

5 AAC 92.003. Hunter education and orientation requirements.

Require all goat hunters to pass an online mountain goat quiz prior to hunting as follows:

Existing regulation:

If you are planning to hunt goats in Units 1, 4, 5, 6C, or 6D you are required to pass the online mountain goat quiz prior to hunting.

Proposed regulation

All goat hunters are required to pass the online mountain goat quiz prior to hunting.

What is the issue you would like the board to address and why? Increase hunter awareness and training in sex identification of mountain goats to help reduce female harvest. Reduced female harvest supports greater populations and more opportunity for hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Jon Nicholas Kruger (EG-F24-085)

PROPOSAL 91

5 AAC 92.003. Hunter education and orientation requirements.

Require all goat hunters to pass an online mountain goat quiz prior to hunting as follows:

Hunters planning to hunt mountain goats in Alaska are required to pass the online mountain goat quiz prior to hunting. https://www.adfg.alaska.gov/index.cfm?adfg=quiz.overview&quiz_id=3

What is the issue you would like the board to address and why? It is well established and accepted that the harvest of nanny's is detrimental to the mountain goat population. According to statistics from ADF&G staff, recent efforts to educate hunters by requiring that they complete a mountain goat gender identity quiz have proven successful in reducing the nanny harvest in those areas. Currently Units 1, 4, 5, 6C and 6D require that hunters complete the Gender Identification quiz found at https://www.adfg.alaska.gov/index.cfm?adfg=quiz.overview&quiz_id=3

There are other areas in the state where there exist mountain goat hunts, both draw and registration, that do not require gender ID education and quiz completion and it is the intention of this proposal to increase the mountain goat gender awareness of hunters by requiring that all registration and draw tags in the state of Alaska include the requirement that the hunter must successfully complete the gender ID quiz prior to hunting. Even in areas like RG480 on Kodiak, where nanny harvest is now required if a second goat is taken, there would be significant benefit to requiring this educational process. It is the hope of this author that this could be a small step in enhancing mountain goat population health and encouraging hunter engagement on goat conservation throughout the state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, I have discussed this with one current and one former ADF&G biologist who are in favor of this proposal and believe that it could be a difference in decreasing nanny harvest.

PROPOSED BY: Paul Forward (EG-F24-094)

Sheep Hunting

PROPOSAL 92

5 AAC 92.003. Hunter education and orientation requirements.

Require sheep hunters to complete an online education course as follows:

Education requirements on Unit 15 moose have shown to reduce sublegal harvest. I suggest developing an educational course and quiz to educate sheep hunters on what a legal ram is and require all sheep hunters to take it.

What is the issue you would like the board to address and why? Currently there is no education to requirements for Dall sheep hunters in Alaska. With the increase in sublegal harvest as available surplus continues to decline, this will have a larger impact on the population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? None

PROPOSED BY: Caleb Martin (EG-F24-035)

PROPOSAL 93

5 AAC 92.171. Sealing of horns and antlers.

Change the sealing requirement for Dall sheep horns from permanent to nonpermanent as follows:

To continue sealing ram horns, the department should mirror the CITES sealing requirements already in place and used for grizzly bears and several furbearers. A plastic seal similar to the CITES seals, can be placed on the skull of harvested rams at the time of sealing. A plastic seal was used on ram horns when sealing was first implemented in 2004.

What is the issue you would like the board to address and why? Repeal the requirement to PERMANENTLY seal (plug) ram horns. There is no scientific or enforcement reason to permanently plug ram horns. I have witnessed several sets of ram horns being permanently disfigured by improper handling during the current process of drilling a hole in the horn and implanting the permanent plug. Several areas in the state require mountain goat sealing and no permanent seal/plug is used during the process to accomplish the same goal of sealing ram horns.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed in coordination with several like-minded sheep hunters.

PROPOSED BY: Jessie Dunshie (HQ-F24-009)

PROPOSAL 94

5 AAC 92.990(30). Definitions.

Change the definition for “full-curl” ram as follows:

A full-curl ram, **whose horn tip of at least one horn, when viewed squarely from the side at right angles to the center of the skull completes, a 360-degree circle.** [WHOSE TIP OF AT LEAST ONE HORN HAS GROWN THROUGH 360-DEGREES OF A CRICLE DESCRIBED BY THE OUTER SURFACE OF THE HORN], as viewed from the side (**figure 1**) [(FIGURE 1)].

What is the issue you would like the board to address and why? Determining full curl legality of Dall sheep rams when field judging or sealing has become far too ambiguous and needs to have a clearer definition that cannot be skewed by different tests and often opinions. This would effectively remove the tube test from a sealing perspective and ensure the hunter is viewing the ram from the correct perspective while in the field. This would simplify the sealing process and still allow for a correct method of using the stick test to establish whether a ram is full-curl or not.

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

PROPOSED BY: Herb Mansavage (HQ-F24-038)

PROPOSAL 95

5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram as follows:

The proposed regulatory change would repeal the age criteria #3, for a full-curl horn of a male (ram) Dall sheep as follows:

1. The tip of at least one horn has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or
2. Both horn tips are broken; broken means the lamb tip is completely absent; horn tips that are chipped or cracked are not broken if any portion of the lamb tip is present; characteristics of the lamb tip include:
 - (i) a length of less than four inches,
 - (ii) the inside surface of the lamb tip is distinctly concave when compared to the remainder of the horn, and
 - (iii) the lamb tip is the section of a horn that is grown during the first six months of a sheep's life and is the section of horn distal of the first annulus, which is the swelling of the horn that forms during the first winter of life.

3. (THE SHEEP IS AT LEAST EIGHT YEARS OF AGE AS DETERMINED BY HORN GROWTH ANNULI)

What is the issue you would like the board to address and why? Repeal criteria #3 for harvest of Dall Sheep statewide. Current definition of full curl harvest by hunters attempting to count annuli rings has led to misidentification of sub-legal sheep being taken.

Statewide Dall sheep populations are far below historical carrying capacities. Rain on snow events, combined with a late spring in 2012/13, as well as similar conditions in subsequent winters, have decimated multiple cohorts of Dall sheep in most populations statewide.

Many ram groups currently do not have full-curl, or both horns broken horns. Dall sheep hunters that do not see these rams then rely on aging a sheep in the field at a distance. This method can easily lead to miscounting the annuli and result in the take of sublegal young rams. This loss of the very few young recruiting breeding rams is of critical concern to the sustainability of the Dall sheep population's recovery to carrying capacity.

Most hunters and even professional biologists can mistakenly miscount annuli rings on 3/4 and 7/8 curl rams on the mountainside. Many hunters cannot age the sheep when in hand, which can be documented with the high numbers of young rams being seized by the department at sealing. Some sub legal rams are abandoned and not documented as a loss.

Very few rams will not eventually become legal under the full curl definition criteria #1 and #2, by either achieving a full curl, or by breaking off both horn tips if left to mature, so having the aging option is unnecessary and detrimental. At this time, few rams are the true full curl definition 1. and 2. due to hunting or environmental related mortality prior to maturity being reached. It is imperative to retain all recruitment rams to maturity during this unprecedented time.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I am the chairman of the Koyukuk River Advisory Committee. I have discussed the issue with the committee, Regional Councils, and many sheep hunters I encounter. I have discussed the issue with ADF&G staff, and other land management staff.

PROPOSED BY: Jack Reakoff (EG-F24-045)

PROPOSAL 96

5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram as follows:

The proposed regulatory change would repeal the age criteria for a full-curl horn of a male (ram) Dall sheep as follows:

- (A) the tip of at least one horn has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or

- (B) both horn tips are broken; broken means the lamb tip is completely absent; horn tips that are chipped or cracked are not broken if any portion of the lamb tip is present; characteristics of the lamb tip include:
- (i) a length of less than four inches,
 - (ii) the inside surface of the lamb tip is distinctly concave when compared to the remainder of the horn, and
 - (iii) the lamb tip is the section of a horn that is grown during the first six months of a sheep's life and is the section of horn distal of the first annulus, which is the swelling of the horn that forms during the first winter of life.
- (C) [THE SHEEP IS AT LEAST EIGHT YEARS OF AGE AS DETERMINED BY HORN GROWTH ANNULI.]

What is the issue you would like the board to address and why? Statewide Dall sheep populations are far below historical carrying capacities. Rain on snow events in the winter, late springs, and other changing weather patterns have continued to decimate multiple cohorts of Dall sheep statewide.

Many ram groups do not contain animals with full-curl horns or horns that are broomed on both sides. Dall sheep hunters that do not see these rams then rely on aging a sheep in the field at a distance. This method can easily lead to miscounting the annuli which results in the take of sublegal rams. The loss of any animal that is sublegal in a population that is declining statewide is of critical concern to the sustainability of the Dall sheep population's recovery.

Sheep can be difficult to age, and it is not always a cut and dry process even in settings outside of the field, such as when the animal is taken to an ADF&G office to be sealed by department staff and law enforcement officers that have seen hundreds of horns.

The percentage of rams have genetics that will make it so they will not achieve full curl in their lifetime appear to be low. Another viable option for the take of a legal sheep is take one with broomed horns, which is an easier feat then counting annuli rings through a scope. Having the aging option is unnecessary and is detrimental to the recovery of sheep population. If there is a situation where a fully mature sheep is taken in the field that somehow does not meet the full curl or broomed criteria, law enforcement officers can use their discretion on issuing citations during the sealing process.

As sheep populations rebound, this change in regulation can always be reexamined and reversed if it is deemed that the removal of the age criteria has been too unfavorable to sheep hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was not developed with others, although the Eastern Interior Alaska Regional Advisory Council and the Koyukuk River Fish and Game Advisory Committee were aware of its submission.

PROPOSAL 97

5 AAC 92.085 (8). Unlawful methods of taking big game; exceptions.

Lengthen the time period hunters are restricted from using aircraft for hunting sheep as follows:

From August 1-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.

What is the issue you would like the board to address and why? The Board of Game has wisely restricted the use of aircraft to “locate sheep or direct hunters to sheep during the open sheep hunting season”. In the experience of many sheep hunters this has made a very positive impact on the experience of sheep hunting and has created a much more fair chase hunt. This regulation does not, however, account for the fact that there is a youth hunt that starts in many parts of the state on August 1 during which time aircraft could be legally used to locate sheep and direct hunters. This is the antithesis of a fair chase hunt and, if/when this happens we are setting a poor example for young impressionable hunters instead of teaching them the importance of fair chase hunting that creates challenge and adventure.

Furthermore, the author of this proposal has also written a proposal to create an archery sheep season from August 6 – 9 and limiting aerial scouting during that time would be important to maintain the spirit of fair chase for that hunt as well.

It’s also worth noting that officially that the Boone and Crocket Club has the following to say:

“I. Spotting or herding game from the air, followed by landing in its vicinity for the purpose of pursuit and shooting;

With the popularity of personal aircraft in the 1960s increasing and being used for hunting to access remote areas in North America, it became apparent that some hunters were using aircraft not only to reach their hunting destination, but locate their game from the air, and in the vicinity, and pursue for a shot. In some cases, hunters were using aircraft to herd game into a more accessible situation. The Club determined that this was an unfair advantage to both the game and other hunters. At the same time the Club established this policy, some states and provinces began outlawing the practice and instituting laws prohibiting hunting the same day as flying.”

Spotting game from the air prior to harvest is clearly a violation of the basic principles of fair chase and pushing back the date for which Alaska permits this would be acting in a way consistent with fair chase and ethical hunting. Even for areas without youth hunts, pushing back the aerial scouting prohibition to the August 1 would decrease the amount number of hunters who fly to their intended

hunting areas in the couple of days prior to August 10 and then locate sheep, land near them by the 9th and subsequently kill them. Anyone who has spent extensive time in sheep terrain has seen examples of this style of “hunting”.

In the past some of the opposition to the exiting aerial scouting ban from August 10 – September 20 have complained that there is increased aviation hazard during the days immediately prior to August 10 because it’s the only time hunters have to locate sheep and move hunters into position. (There are also limited pilot position reports during that period because of the intent to keep sheep hunting locations secret.) If the period was pushed back to August 1, this would potentially create a safer situation because pilots would only be flying directly to predetermined sites to drop hunters instead the low and circuitous flying that has been cited as hazard if several pilots are doing it in the same area. This proposal could potentially decrease aviation hazard during sheep season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I discussed this proposal with several ADF&G biologists who agree with the spirit and sentiment of the proposal.

PROPOSED BY: Paul Forward (EG-F24-093)

PROPOSAL 98

5 AAC. 92.085 (8). Unlawful methods of taking big game; exceptions.

Lengthen the time period hunters are restricted from using aircraft for hunting sheep as follows:

From August 1 - October 15, 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.

What is the issue you would like the board to address and why? Aerial scouting for Dall sheep is currently allowed outside of the general season Dall sheep season of August 10 - September 20. Currently all youth hunts and some archery hunts fall outside of these general season dates and therefore aerial scouting during those seasons is allowed. Dall sheep populations are in decline. Restrictions on all aerial scouting during all open seasons will reduce pressure on sheep.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-077)

PROPOSAL 99

5 AAC 92.085 (8). Unlawful methods of taking game.

Shorten the time period hunters are restricted from using aircraft for hunting sheep, and modify the use of aircraft restrictions as follows:

My solution is to change the length of the restrictions and modify them after the first 11 days of the season as follows:

(8) From August 10th through August 20th [SEPTEMBER 20th] aircraft may not be used by and for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during THIS PART OF the open sheep hunting season, however, aircraft other than helicopters may be used by and for sheep hunters to place and remove hunters and camps, maintain existing camps, and salvage harvested sheep DURING THIS PERIOD. From August 21st through September 20th aircraft cannot intentionally approach any closer than 1500 feet or 500 yards from any sheep for the purpose of hunting them.

What is the issue you would like the board to address and why? I think the aircraft restrictions in 5 AAC 92.085 (8) are too long and overly restrictive and should be shortened and modified.

This regulation has been in place since 2015 and restricts anyone from using an aircraft to intentionally spot ANY sheep from ANY distance from the air during the entire general season, August 10th to September 20th for the purpose of hunting them. Most of the public thinks you can not even fly in sheep country during the open season under this regulation and resident hunters with their own airplanes fear being turned in to the troopers and don't even attempt to hunt later in the season because of it. Most of the sheep guides were adamantly against this regulation at first but changed their minds after they realized it had basically eliminated resident hunters after the first 10 days of the season. This was a board generated proposal that they said was to stop people from buzzing sheep and disrupting other sheep hunters hunts but it went way beyond that. It needs to be changed.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this change and language myself.

PROPOSED BY: Dan Montgomery (EG-F24-076)

Note: Proposed amendments to 5 AAC 85.055, including changing hunts to drawing permit hunts and changing seasons and bag limits for Dall sheep, are outside the scope of the Statewide Regulations meeting.

PROPOSAL 100

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.

Limit nonresident sheep hunting opportunity statewide so that nonresidents do not harvest more than 35 percent of total sheep harvest from any game management subunit as follows:

Regulatory Changes this Proposal Requests

The solution we seek with this proposal is to limit nonresident sheep hunting opportunity statewide in a manner **whereby nonresidents do not harvest more than 35 percent of the total sheep harvest from any game management subunit**. Such a harvest allocation is more than fair to nonresidents. If nonresident sheep harvest exceeds 35 percent of the total harvest in any one area, that area's allocation of permits shall be reduced. We did not suggest specific allocations for several units listed below, leaving that to the board to best determine based on Department of Fish and Game nonresident sheep harvest data.

If the allocation remains an up-to number, the department will need direction and guidance from the board as to a starting point and when a higher number of permits should be awarded.

Please note, for multiple subunits listed together, the suggested up-to number of permits is for each individual subunit.

Unit 7 Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 2 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 11

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 12 Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 13A, 13B Remainder, 13C Remainder, 13D Remainder, 13E

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 14A Remainder, 14B

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 15 Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 2 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 16

Nonresident

One ram with full curl horn or larger

Aug 10 – Sept 20

every four regulatory years by permit;
up to X number of permits may be issued

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 19A, 19B, 19D, 19E

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 19C

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to 15 permits may be issued

Aug 10 – Sept 20

[NO OPEN SEASON]

Unit 20 Remainder

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to 20 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 24A within the Dalton Highway Corridor Management Area

Nonresident

One ram with full curl horn or larger
every four regulatory years by permit;
up to 10 permits may be issued

Aug 10 – Sept 20
[AUG 10 – OCT 5]

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 24A Remainder, 24B Remainder

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 25A east of the middle fork of the Chandalar River, excluding the Eastern Brooks Range Management Area

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 25A within the Dalton Highway Corridor Management Area

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

**Aug 10 – Sept 20
[AUG 10 – OCT 5]**

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 25B, 25C.25D

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to X number of permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 26A east of and including the Etivluk River drainage, excluding Gates of the Arctic National Park, and Unit 26C

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

Unit 26B within the Dalton Highway Corridor Management Area

Nonresident

One ram with full curl horn or larger every four regulatory years by permit; up to 10 permits may be issued

**Aug 10 – Sept 20
[AUG 10 – OCT 5]**

[ONE RAM WITH FULL CURL HORN OR LARGER EVERY FOUR REGULATORY YEARS]

What is the issue you would like the board to address and why? Unlimited nonresident sheep hunting opportunity in many units, conservation concerns, conflicts and crowding.

Problem Statement

The Board of Game (board) *has known for a long time* that unlimited nonresident sheep hunting in certain areas causes crowding and conflicts and leads to nonresident guided sheep hunters taking the majority of the sheep harvest each year.

But the board, while acknowledging these problems, has continually refused to limit nonresident sheep hunters in the known problem areas to draw-only permits – as Resident Hunters of Alaska (RHAK) has proposed each cycle – using the rationale that nonresident draw permits with limited allocations “don’t provide stability to guide businesses.”

In 2023, after nonresident guided sheep hunters took 90 percent of the sheep harvest in Unit 19C the previous year from a severely declining sheep population, the board completely closed all nonresident sheep hunting in the subunit for five years due to sheep conservation concerns. For some reason the board preferred a complete closure to nonresident sheep hunters – which shuts down all guided sheep hunting businesses in the area – over limiting nonresident sheep hunters.

The board believes the best, and thus, *only* solution to unlimited nonresident sheep hunting opportunity *that the board itself allows* is to limit the number of guides on state lands. The real problem, according to the board, is not too many nonresident sheep hunters who are required to be guided; it's too many guides, and the solution is a convoluted and expensive Guide Concession Program (GCP) on state lands that would ostensibly limit guides and in turn limit the number of their nonresident clients and harvests.

The board has pursued and supported a GCP as the only solution to the known problems for over a decade, but such a program requires legislative action and approval. During the 28th legislative session in 2014, a bill was introduced (SB 160) to create a GCP on state lands where most all these problems occur, but it had a million-dollar fiscal note and other issues and never even made it out of committee. After that failure the board continued to do nothing to limit nonresident sheep hunters and kept pushing for another bite at the apple. A similar bill was introduced in 2024 during the current (at time of this writing) 33rd legislative session in both chambers (SB 253/HB 396), with a smaller half-million-dollar fiscal note, that would put the Department of Natural Resources (DNR), a land management agency, in control of a Guide Concession Program on state lands to regulate the number of guides and determine which guides win exclusive concessions. At the time this proposal is being drafted, with two weeks left in the legislative session, those bills are not expected to go anywhere.

For nearly 20 years now, the board has been aware of the known problems they have created by allowing unlimited nonresident sheep hunting opportunity in certain areas but has kicked the can down the road on using their authority to limit nonresident sheep hunters.

This proposal asks the board to do the right thing now and put all nonresident sheep hunters in areas where they are not currently limited on draw permits with a limited allocation. The board could put a sunset clause on any new limits on nonresident sheep hunters, whereby should a GCP pass the legislature and be incorporated in these areas, those regulations are voided. But it's highly likely that any limits placed on nonresident sheep hunters in specific areas via a draw permit system would be the same or similar to the limits on guided hunters imposed by a GCP. The board could also stipulate that the number of permits awarded can be reviewed in cycle for that region if sheep populations rebound.

RHAK's Overall Objective with this Proposal

Our main objective is to ensure our Dall sheep populations are managed sustainably with an emphasis on protecting future resident general sheep hunting opportunities. This should also be the primary objective of the board. Our secondary objective is to reduce the crowding and conflicts and ensure nonresident sheep hunters retain *some* sheep hunting opportunities, rather than having their opportunity completely shut down in individual units.

Unlimited nonresident sheep hunting opportunity should never be allowed anywhere in the state, regardless of if it leads to sheep conservation concerns, simply because we know the problems that creates in the field that also lead to excessive nonresident harvests.

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

PROPOSED BY: Resident Hunters of Alaska (RHAK) (HQ-F24-041)

PROPOSAL 101

5 AAC 92.106. Intensive management of identified big game prey populations.

Add sheep to the list of species identified as important for providing high levels of human consumptive use as follows:

5 AAC 92.106. Intensive management of identified big game prey populations.

For purposes of implementing AS 16.05.255(e) - (g), the Board of Game (board) will

(1) consider the following criteria when identifying big game prey populations that are important for providing high levels of human consumptive use:

(A) harvest size: the average annual historic human harvest meets or exceeds values as follows:

- (i) caribou: 100;
- (ii) deer: 500;
- (iii) moose: 100;
- (iv) sheep: XX;**

What is the issue you would like the board to address and why? The Board of Game (board) and Department of Fish and Game have received numerous requests to take action to benefit sheep populations that have declined across the state. Currently, sheep are not an intensive management (IM) species.

The Legislature tasked the board in statute (AS 16.05.258(e)-(g)) with adopting regulations to provide for IM programs to restore the abundance or productivity of big game prey populations the board has identified as necessary to achieve the human consumptive use goals established by the board in regulation. While there are other statutes that specify a particular species, AS 16.05.258 only speaks to big game prey populations providing the board with the ability to determine which species qualify under AS 16.05.258. To further clarify the duties of the board, the Legislature tasked the board with identifying prey populations that are important for providing high levels of human consumptive use, and the board has set an average annual historic human harvest size for the three current IM species (caribou, deer, and moose). The board then created regulations, for the purposes of implementing AS 16.05.258(e)-(g), identifying specific big game prey populations or portions of populations as important for providing high levels of harvest for human consumptive use, and to establish the population objectives and harvest objectives for those populations.

AS 16.05.258(e)-(g) allows for both predator and habitat management to restore big game prey population abundance. Regulations adopted by the board under that statute are specific to each

population and can include a mix of varying degrees of both predator control and habitat enhancement.

Both the board and department have received significant input on the question of designating Dall's sheep as an IM species. This proposal is an opportunity for the board, advisory committees, the public, and the department to have robust discussions and deliberations on this subject. If adopted, this proposal is the first step in a very long public regulatory process to allow IM of Dall's sheep populations and does not guarantee sheep will be intensively managed if it is adopted. If adopted, the next steps will be for the board to evaluate populations to determine if there is a positive IM finding for a given population, and if so, to establish population and harvest objectives which is typically done at the regularly scheduled board meetings for the regions where the populations are located.

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

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F24-083)

Unit 19C Sheep Hunting

Proposal 102 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 76.

PROPOSAL 102

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

Reopen all Unit 19C sheep hunts as follows:

Full curl management is the best option biologically for Dall sheep management supported by our ADF&G biologist. I propose that the Board of Game (BOG) reinstates the subsistence sheep hunt as previously allowed. As well as reinstate a nonresident hunt of one ram every four regulatory years with hunt dates of 8/15-9/10 annually.

What is the issue you would like the board to address and why? The nonresident and subsistence season for Dall sheep in Unit 19C. Dall sheep have been shown to be on cyclical patterns since the beginning of their study and tracking in Alaska in the 1920s. Full curl management has been implemented since 1992 and this is one of the most conservative approaches to sheep management in the United States that have sheep. This ruling was decided on at a time where Dall sheep were at remarkably similar numbers to their current numbers. We have seen an abundance of sheep in 2003 and 2018 since that time. Biologist support this management strategy and do not support closures. The numbers seen in Unit 19C are paralleled in other units of the state including those in national parks where no hunting is permitted. This is a predator and weather issue much more than it is hunter take. Over the past five years numbers of hunters have declined by 62%, this is resident, nonresident & subsistence hunters. The numbers are reflecting the effort in the field and self regulating already. By closing two user groups down this will send more pressure into other areas of the state and create even more problems. ADF&G studies have shown that the mortality rate of Dall sheep greatly increase after eight years. This population which is legal to hunt is going to die of natural causes and go unused. This eight year old population is also at the end of their competitive mating life. Not managing these animals does not add sheep on the mountains.

PROPOSED BY: Anthony Marchini (EG-F23-268)

Proposal 103 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 77.

PROPOSAL 103

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

Reopen Unit 19C to sheep hunting as follows:

The Board should rescind Proposal 204 as passed in Soldotna.

What is the issue you would like the board to address and why? The Board erred greatly by passing Proposal 204 as amended from the last Board of Game meeting in Soldotna.

I urge the board to rescind its actions on Proposal 204 which was “faulty” on several fronts. Here are a few of the elements which were disregarded:

Board-Generated Proposals

The Board should be receiving proposals from the public, not creating its own proposals that it then passes. This action essentially supersedes the rights of the public and appears to be a conflict of interest since the board can hardly be unbiased as to its very own proposal.

Conservation to Discrimination

The drafting of board-generated Proposal 204, based on emotion and not facts, was written as a self-perceived rescue operation for the sheep of Unit 19C by precluding all hunting for five years. This is so outlandish it clearly has absolutely no basis in fact for its creation, either for the duration or the severity of the proposal. But somewhere along the chronology of the discussion, the conservation motive was cast aside for an arbitrary and capricious substitute precluding only nonresident sheep hunting. There was no legitimate reason to discriminate against nonresidents.

Board of Game Usurps the Commissioner’s Authority to Manage

We can see the first duty of the Commissioner in statute is to manage. So why did the board step in and presume to do so by creating Proposal 204? If there really was a conservation concern, the Commissioner could at any time create an emergency order to modify the harvest. But there wasn’t a conservation concern on the part of the real manager to justify the board’s actions, therefore the Board overstepped its bounds in creating and passing Proposal 204.

Ignores the Economic Wellbeing of the State per AS 16.05.020

In sheep hunting across the state, if you don’t include the sale of Governor’s tags, nonresident sheep hunters contribute about 86% of the sheep hunting revenue that goes to the Fish and Game Fund. Residents contribute 14%. Historically in Unit 19C nonresident hunters contribute 95% of sheep hunter funds going into the Fish and Game Fund. So if the statutes require, in the decisions about how wildlife should be managed, that the “general wellbeing of the economy” be given credence, under what mathematical system would the board exclude the users who pay 95% of sheep hunter revenue in Unit 19C? Before the current weather mediated lower sheep numbers, equal numbers of resident and nonresidents hunted in that unit each year. With the Pittman-Robertson match residents on average over five years brought to the Fish and Game Fund \$18,000 per year while nonresidents contributed \$367,000 annually. Failing to consider the importance of the economic implications of the final outcome of the board’s decision, precluding nonresidents is clearly nothing short of a grievous fiscal error on the part of the board.

Ignores the October Department Sheep Report

In October the board called on the department for a “state of sheep” report. Department staff gave a wonderful and detailed report, and in so doing said straight out the decline in sheep

numbers, where they occur, are weather-driven, AND there is NO CONSERVATION CONCERN. The board apparently failed to hear what everyone else heard from these dedicated department sheep biologists. But the department again sent the same message to the board at the recent Board of Game meeting, and the board appeared to have not heard it. It would be inappropriate if this occurred because the board was so invested in their own proposal (read conflict of interest) that they once more ignored what the experts had to say and acted in contrary to the data provided them (twice). Indeed, if there is no conservation concern as stated by the managers (the department), why did the board act so egregiously by taking matters into its own hands thinking they had the data and scientific knowledge greater than that of the department's experts?

Ignores the Protective Nature of Full Curl

It is widely known and accepted by biologists who have been in the business for several decades that a full curl harvest regime is helpful to the population as a whole in that only the surplus mature rams are harvested. The father of sheep biology, having proved the benefits of full curl, and this work was retested on Dall sheep¹, Testimony was given to the Board of Game that this regime is the most protective to sheep while also keeping the young rams from over stressing at breeding time and wearing themselves out trying to copulate as they would without the presence of mature rams to disincentivize them from acting out. Oddly, in Units 7 and 15 where the sheep situation is much worse off than that in Unit 19C, the board just let full curl ride, but in Unit 19C, a lesser affected area, the board went straight to not letting full curl do its job and instead did the irrational thing by precluding hunters when there was no reason to.

Going Emotional Instead of Relying on The Science

I was told that a retired trooper in the hopes of precluding any sheep hunting in Unit 19C (where his son got a 42" ram a couple years ago) was saying if there are no rams to break trail in the snow for the lambs, the latter would die. If it is true, this story got any traction at all it is a fanciful fabrication. Lambs don't hang out with rams. They stay with their mothers who don't hang out with the rams either. The board must base its decisions on truth and data as shared by the department's experts, not on emotional tales invented to elicit an emotional response.

Ignores the Adaptability of Sheep

Sheep have been in Alaska for thousands of years. And in those years there surely must have been fluctuations in population numbers. We know that parts of Alaska experienced both tropical epochs followed by deep glaciation. Sheep are adaptable. They have probably suffered much worse than things are now in Unit 19C, or even Units 7 and 15. They will be fine. The current low numbers are due to weather events, and they will rebound. Until then there is no reason or any scientific basis to curtail any hunting at this time.

So please rescind what was passed for all the wrong reasons of Proposal

204. Thank you very much.

¹The author provided names of individuals which were redacted as a matter of proposal policy.

Proposal 104 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 78.

PROPOSAL 104

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

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

5 AAC 85.055. Unit 19C Sheep

Nonresident hunters. One ram with full curl horn or larger every four regulatory years.

Harvest ticket. August 10 - September 20 [No open season]

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have shown a cyclical pattern since record keeping began in the 1920s. Per the Alaska Department of Fish & Game (ADF&G) website, “Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.” This cyclical pattern is well documented in the 2022 Board of Game (BOG) Dall’s Sheep Informational Meeting Presentation that was presented by ADF&G. In 1945, 1992 and 2022 were all noticeable downturns in overall sheep populations. In retrospect, an abundance of sheep were observed in 1930, 1968, 2003 and 2018. The department opposes a closure of Dall sheep hunting but remains neutral as to who gets to hunt Dall sheep based on historical trends in Dall sheep populations and the states full curl eight-year-old regulation.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. The harvesting of full curl, eight plus year old rams is just a small fraction of the overall population and the empirical evidence has shown to have no detrimental effects on the overall population. This regulation has allowed the department to have a longer hunting season and provides ample opportunity for all to hunt a full curl ram. Full curl regulation has been the best management tool for 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chances of survival greatly diminish within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Furthermore, harvesting these older rams gives the younger adults, which are in their prime, protection from injury during the rutting season. The full curl eight plus year old ram resource will go unutilized when hunter participation is limited and or restricted. Since the start

of the decline, Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five year period. Why? The short answer is self-regulation. ADF&G records of hunter participation show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts in other areas of the state. A quick search on the ADF&G website indicates that other mountain ranges have seen an increase in sheep hunters since 2018. On the flip side, the five year period leading up to 2018 saw a steady increase in Dall sheep hunter participation due to good numbers of sheep and higher than normal success rates. Hunter participation will rise and fall right along with the rise and fall of Dall sheep populations. The department estimated 40 harvestable rams in Unit 19C for the 2022 season and records show that 27 residents participated in the hunt. Again, the Dall sheep resource will go unutilized by limiting nonresident participation.

If nothing is changed, a harvestable number of rams will go unutilized in Unit 19C. Other units will see a noticeable increase in Dall sheep hunter participation. Not only in guided nonresident hunters but also in second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. On a side note, any Alaska businesses that are related to nonresident sheep hunting will suffer.

PROPOSED BY: Spencer Pape, Seth Kroenke, Jeff Rost, and Jon Burrows (EG-F23-307)

Proposal 105 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 79.

PROPOSAL 105

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

Reopen Unit 19C to nonresident sheep hunters as follows:

Unit 19C Dall Sheep Hunting Season Dates 2024:
Nonresident Hunters: Aug 10 - Sept 20, 2024.

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting opportunity within Unit 19C.

Dall sheep management in Alaska has been successfully conducted for several decades by utilizing the “Full Curl” concept of management which recognizes that harvest of older age class rams does not impact overall sheep population trends. This is a long time proven scientific basis that has successfully spanned numerous historical varying Dall sheep population trends, eras, and regions throughout the state without requiring changes to allocation.

Through addressment of an out of cycle proposal (2023 instead of 2024) relative to closing nonresident Dall sheep allocation within Unit 19C, the proposal as passed was emotionally

driven, ignored long term proven scientific management, was out of bounds in relation to the integrity of the process, and hurtful to those who depend upon the scientific driven conservation basis of wildlife management.

By deviating from proven, scientific management guidelines, we have paved the way for utilization of non-science-based action to base similar hunter restriction or elimination efforts within both State and Federal wildlife management arenas.

Board of Game (BOG) decisions turning away from Dall sheep full curl management will lead to similar requests relative to moose management by antler restrictions.

If it is not broken, don't fix it. Do not open Pandora's Box of curses. Full curl management and antler restrictions work.

Elimination of allocation without proven science and ignoring proven science to take away livelihoods generates unneeded disrespect for the BOG process. How can any professional guide service provider try to build viability and sustainability within a conservation based operating basis, not live in fear of BOG actions. This type of action generates unneeded disrespect for the process.

BOG action taking away nonresident hunter allocation, will not affect the Dall's sheep population trend within Unit 19C.

ADF&G Department of Wildlife Conservation staff provided the BOG solid data that Dall sheep management by full curl guidelines works. The BOG chose to differ from known and proven science by eliminating nonresident allocation within Unit 19C.

Professional guides would have a few hunters according to viable opportunity, the dreams of their clients would be intact, local businesses would have continued to have revenue, resident hunters would have opportunity and all of us should have turned together to focus on initiatives that would actually help our wild sheep.

The Alaska Board of Game and Big Game Commercial Services Board have a liaison position which was developed for situations that need addressed by both entities. That position should be encouraged to bring

concerns relative to conservation trends for distribution to professional service providers who operate within the regions and species of concern. This position was designed to help buffer conservation and allocation concerns and should be encouraged.

Respectfully Submitted

PROPOSED BY: Taiga Resources Conservation

(EG-F23-310)

Proposal 106 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 80.

PROPOSAL 106

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

Reopen sheep hunting in Unit 19C to nonresidents as follows:

What solution do you recommend?

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

5 AAC 85.055. Unit 19C Sheep

Nonresident hunters. One ram with full curl horn or larger every four regulatory years. Harvest ticket. **August 10 - September 20** [No open season]

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have a cyclical pattern observed since the 1920s when record keeping began.

I quote, from Alaska Department of Fish and Game (ADF&G) website, “Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.”

The cyclical pattern has been documented in the 2022 Board of Game (BOG) Dall Sheep Informational Meeting Presentation presented by ADF&G. In 1945, 1992 and 2022 displayed noticeable downturns in overall sheep populations. While an abundance of sheep were observed in 1930, 1968, 2003 and 2018. Primarily due to weather events.

The board adopted the full curl regulation in 1992. This is one of the most conservative approaches to Dall sheep management. Limiting harvest to full curl, eight plus year old rams, which are a small percentage of the overall sheep population has been proven to have no detrimental effects on population. Even compared to National Parks in Unit 19C where hunting is not allowed. Full curl regulation has been the standard management tool for 30 years protecting our sheep herds from overharvest while allowing all users opportunity to hunt.

Department studies show once a ram is more than eight years, chances of survival are much lower. Very few rams survive beyond 12 years. Full curl, eight plus year old rams’ constitute less than 5% of the total sheep population. The harvesting these older rams eight years + has shown no negative impacts on sheep populations. Taking older rams out of the herd gives the younger sheep

less risk of injury during the rutting season and less grazing competition. Resulting in better chance of breeding age rams surviving a difficult winter.

Unit 19C recently has seen a large decline in hunter participation

During the 2018 season, Unit19C saw a record number of 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. In a 5-year period there was a 62% decline in sheep hunters. Hunters tend to self-regulate as game populations cycle leading to fewer hunters. ADF&G records of hunter participation show when game populations are low, fewer hunters hunt that area. Dall sheep hunter participation in Unit 19C represents these trends. The sheep population declined, success rates were lower, sheep hunters moved to other areas. ADF&G website indicates other units with sheep populations have increased in hunter participation since 2018. In Unit 19C the five year period leading up to 2018 there was an increase in Dall sheep hunters due to good numbers of sheep and above historical success rates. These trends show hunter participation follows the cyclic nature of Dall sheep populations. An ADF&G estimated 40 harvestable rams in Unit19C for the 2022 season, 27 residents participated in the hunt. By closing the nonresident season the Board of Game went against ADF&G opposing the proposal to close the season for five years. This shuts out an entire user group. Following the data this will move sheep hunters to other areas of the state while there is an opportunity for harvestable rams in Unit 19C.

If nothing is changed:

Other units will see a noticeable increase in Dall sheep hunter participation many of which are showing the same decline due to winter events as Unit 19C. From guided nonresident hunters, second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. Creating additional competition amongst user groups in these areas. All while harvestable mature rams will be available the to hunt is lost for three **(yes 3)** user groups.

Alaska businesses that are related to nonresident sheep hunting will suffer:

1. Loss of revenue
2. Loss of jobs
3. Loss of license monies and associated Pittman-Robertson match funds
4. Land use permit monies
5. Potential business closures by commercial operators

All from an adopted proposal unsupported by our professional biologists at the Alaska Department of Fish and Game.

PROPOSED BY: Jeff Pralle

(EG-F23-275)

Proposal 107 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 81.

PROPOSAL 107

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

Reestablish seasons and bag limits for sheep hunting in Unit 19C as follows:

I don't have access to the new language passed by the board in March. My ideal suggestion would be for two members of the board call a meeting to delay implementation of this action for one year pending better data. Failing that, the seasons and bag limits for Unit 19C should be reestablished for the 2024 season.

END NOTE: The practice of board-generated or board amended proposals is not clearly permitted in Alaska Statute or regulations. Just where the idea arose is uncertain, but it seems to have come along when former ADF&G biologists (who were accustomed to being managers) began to serve on the Board of Game.

Complicating the issue is the underlying confusion between “management” and “allocation.” management has to comply with the Alaska Constitution and statutes. However, “management” can be effectively altered or truncated by regulation. There is little safeguard against this eventuality. If the Board of Game cannot tease this confusion out satisfactorily with the actual manager of record, the Commissioner’s Office/department, it would be rational for the legislature to provide more direct guidance. That process is presently being debated for the “Area M” commercial fishery via HB 128.

When the Board of Game makes its own proposal for regulatory change where the manager has not been substantively involved, then subsequently amends the proposal in deliberation (with no opportunity for public comment), and the final board vote is apparently swayed by emotional appeal. The optics (whether procedurally allowable or not) are not good.

What is the issue you would like the board to address and why? The recent board action banning nonresident Dall ram hunting in Unit 19C should be rescinded or delayed. I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

BIOLOGY AND MANAGEMENT:

1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today’s declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.
2. This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.

3. Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.
4. The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.

PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)

1. The apparent declines in Dall sheep populations have lead to the *intuitive assumption* that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.
2. Sufficient concern over these *intuitive assumptions* was expressed to the Board of Game that it requested an informational meeting with Alaska’s Dall sheep biologists and managers about the status of Dall sheep research and management last October.
 - a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner’s Office through the Department of Fish and Game. According to the established statutes, the Commissioner’s Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.
3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.
4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.
5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.
6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board- generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.
7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted.
 - a. At this time, the total input from the “generating board” is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.
8. Subsequently, the board met in mid March to consider the board-generated proposal to close all

Dall sheep in Unit 19C for five years.

9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass.
 - a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim.
 - i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK's request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.
10. In an apparent effort to garner more board support (votes) for the (his or the Board's?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting.
 - a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.
11. The board approved the amendment, and moved to consider the amended proposal.
12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.
13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote margin.
 - a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.
14. As things stand at present, nonresident participation in mature Dall ram harvesting is scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt. are still allowed by regulation.

PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,
 - “ . . . the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner's Office.
 - a. Alaska law (**AS 16. ARTICLE 1. Sec. 16.05.010.**

Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME) says “The commissioner is the principle executive officer of the Department of Fish

and Game.”

2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the . . . game resources of the state in the interest of the economy and general well-being of the state.”
 - a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner’s obligation and authority to manage in the best interests of Alaska’s economy.
 1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.
 2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”
 - a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.
 - b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.
3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says: “. . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”
 - a. If use isn’t maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident- free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

PROPOSED BY: Wayne Heimer

(EG-F23-266)

Proposal 108 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 82.

PROPOSAL 108

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

Change nonresident sheep hunting in Unit 19C as follows:

**Unit 19C
Nonresident Hunters**

One ram with full curl horn or larger by drawing permit only, every four regulatory years; up to 10 permits may be issued
[ONE RAM WITH FULL CURL HORN
OR LARGER, EVERY FOUR REGULATORY YEARS]

Aug 10 – Sept 20

Alternatively, the board could use a percentage of the estimated harvestable surplus of legal rams to allocate draw permits to nonresidents, as follows:

**Unit 19C
Nonresident Hunters**

One ram with full curl horn or larger by drawing permit only, every four regulatory years; the number of permits issued may be up to 25 percent of the estimated harvestable surplus of sheep.
[ONE RAM WITH FULL CURL HORN
OR LARGER, EVERY FOUR REGULATORY YEARS]

Aug 10 – Sept 20

Note: The Department states that there is currently a harvestable surplus of 30 legal rams in Unit 19C.

What is the issue you would like the board to address and why? Since our formation in 2016, Resident Hunters of Alaska (RHAK) has been submitting proposals (all voted down) to limit nonresident sheep hunters in Unit 19C, based on sheep conservation concerns and fears residents would lose general sheep hunting opportunities if nonresidents were not limited. For over a decade, unlimited nonresident sheep hunters have taken nearly 80 percent of the annual ram harvest in Unit 19C. In RY 2020, the department closed the winter subsistence sheep hunt based on biological concerns for the sheep population, but the board did not act as required to place any restrictions on the general hunt. The sheep population continued to decline and in 2022 nonresident sheep hunters took 90 percent of the harvest of a significantly reduced sheep population.

Our concerns and fears were realized when the board, after years of implying that unlimited sheep hunting opportunity under full-curl harvest management was sustainable, submitted their own board-generated Proposal 204 out of cycle for the 2023 Region II (Southcentral) meeting to completely close all sheep hunting in Unit 19C for five years for everyone, based on conservation concerns for the sheep population.

Proposal 204 was amended to close Unit 19C sheep hunting only for nonresidents for five years and passed by a 4-3 vote.

RHAK has never sought to eliminate nonresident sheep hunters, and had the board taken action in previous years to limit nonresident sheep hunters, this complete nonresident sheep hunting closure in Unit 19C would not have been necessary and would not had such an impact on guides and their clients who already had hunts booked, as well as impacts to department revenues from the loss of income from the sale of nonresident hunting licenses and sheep tags.

This proposal is being drafted after the board decision in March of 2023 to close Unit 19C to all nonresident sheep hunting for five years, recognizing that there will likely be proposals submitted for the Region III (Interior and Eastern Arctic) meeting in 2024 to open the nonresident sheep hunt earlier.

We could support a nonresident opening prior to 2028 if nonresident sheep hunters were put on a draw permit system now with a limited allocation of permits.

PROPOSED BY: Resident Hunters of Alaska (HQ-F23-015)

Proposal 109 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 83.

PROPOSAL 109

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

Reopen sheep hunting in Unit 19C to nonresidents, by bow and arrow only, as follows:

Reinstate nonresident Dall sheep hunting in Unit 19 but by bow and arrow only as follows:

Unit 19

Nonresidents

BAG LIMIT: ONE RAM WITH FULL-CURL HORN OR LARGER EVERY 4 REGULATORY YEARS BY BOW AND ARROW ONLY

SEASON DATES: AUG 10 - SEPT 20

[No open season]

What is the issue you would like the board to address and why? I believe a solution to

continue nonresident sheep hunting opportunity while also reducing the take would be to allow hunting by bow and arrow only. The Board of Game recently closed sheep hunting to nonresidents in Unit 19 due to perceived ideas of hunter impact by locals. The department evidence did not support that nonresident sheep hunters who were limited to one full curl ram every four years, were the reason for sheep population decline in Unit 19. The department cited that weather was the driving factor in the sheep decline. I feel that taking away hunting opportunity in this case is not solving anything and is also potentially hurting outfitters in the area for no good reason.

Bringing back the nonresident season, but limiting the take to bow and arrow only would accomplish three things. First, it would bring back the opportunity to pursue mature rams and allow guides to continue offering sheep hunts. Second, the take would be extremely minimal due to the challenges of hunting sheep with archery equipment, therefore accomplishing the original goal of limiting harvest numbers. Third, this would be a great opportunity to build a record and data of how bowhunting can be used as a valuable management tool that can save hunting opportunities while at the same time not making a negative impact on game populations.

This data could also be used to revisit this topic in the next Board of Game cycle for this area.

PROPOSED BY: Mike Harris (EG-F23-299)

Proposal 110 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 84.

PROPOSAL 110

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

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years as follows:

One full-curl or larger ram every two regulatory years for residents. Nonresidents are already at one legal ram every four regulatory years. This places a higher priority on shooting mature aged rams and lessens the chance of a sub legal ram taken by mistake. Rams “close” to legal will be passed over and saved for the next season when they are obviously of age and legal hence giving them at least one more season of mating to help the population.

What is the issue you would like the board to address and why? The harvesting of sublegal rams. While the bulk of the sheep population issue is weather and predator related. An issue that we can help is the taking of sub legal rams. 8 year old, full curl or double broken rams are the statewide professional biologist standard of management. To put more of an emphasis on this and leaving breeding age rams in the population longer therefor putting more sheep on the mountain in the long term. Taking of sub legal or immature rams needs to be placed in a higher priority.

PROPOSED BY: Anthony Marchini (EG-F23-274)

Proposal 111 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 85.

PROPOSAL 111

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

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to eight year old rams, as follows:

Resident hunters in Unit 19C:

Harvest of a ram 8-year-old or older and hunter will be eligible to hunt sheep the next season. Harvest a 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a 6-year-old or younger ram, and the hunter will be ineligible to hunt sheep for the next three seasons.

***If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

What is the issue you would like the board to address and why? In recent years there has been widespread concern raised about the harvesting of young rams during Full-Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska's sheep population has been noted to be on a steady decline and it's time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 during the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines, which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight years-old and if a few old outliers are removed, from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5-years-old with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large

number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Full-Curl Management regulation. Shooting a full curl seven- year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C. I am open to this being adopted region or statewide but have targeted it here to Unit 19C due to recent concerns. Unit 12 would also be a good place to introduce this regulation.

PROPOSED BY: Paul Forward (EG-F23-285)

Proposal 112 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 86.

PROPOSAL 112

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

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to ten year old rams, as follows:

***This is a more conservative version of the other proposal with more conservative age requirements. This is consistent with some of the theories on ram viability put forth by multiple wildlife biologists from Alaska and British Columbia.

Resident hunters in Unit 19C:

Harvest of a ram 10-years-old or older and hunter will be able to sheep hunt again in Alaska the next season.

Harvest of a full-curl or carger ram 8 or 9-year-old, the hunter will be ineligible to hunt sheep for next one season.

Harvest a full-curl or larger but 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a full-curl or larger but 6-year-old or younger ram, the hunter will be ineligible to hunt sheep for the next three seasons.

***If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

What is the issue you would like the board to address and why? In recent years there has been widespread concern raised about the harvesting of young rams during Full Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent

concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska’s sheep population has been noted to be on a steady decline and it’s time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 in at the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight-years-old and if a few old outliers are removed from the approximately 50 or so rams killed when calculating, the average age of a sheep killed is under 7.5 with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Management regulation. Shooting a full-curl seven7-year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C.

PROPOSED BY: Paul Forward (EG-F23-287)

Proposal 113 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 87.

PROPOSAL 113

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

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C as follows:

Unit 19C Resident Dall Sheep General Season: August 15th - September 10th.

Nonresident Dall Sheep Season: August 21st - September 10th.

Youth Hunt Season: None

Subsistence Hunt Season: no recommendations

Bag limit for resident or nonresident: Same as current - one ram that is 8-years-old, broken on both sides, or full-curl or passes the angle or stick test on at least one side.

Methods and Means: General harvest methods.

What is the issue you would like the board to address and why? The Board of Game (BOG) had legitimate conservation concerns about Dall sheep populations in Unit 19C and submitted a board generated proposal for the Southcentral Region Meeting in Soldotna in March of 2023. It would've impacted all user groups equally by closing the season for five years for everyone. They ended up amending the original proposal and passing one that was mostly if not entirely allocative, by closing in entirely to nonresidents and leaving the entire resident season - except for the youth hunt, in place. This caused serious financial losses to many, including the state of Alaska Department of Fish and Game.

PROPOSED BY: Wayne Kubat (EG-F23-322)

Proposal 114 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 88.

PROPOSAL 114

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

Change all sheep hunting in Unit 19C to archery only, and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only as follows:

This proposal would transition all sheep hunting in Unit 19C to **by bow and arrow only**.

Resident: One ram with full-curl horn or larger **by bow and arrow only**.

Nonresident (when/if moratorium ends): One ram with full-curl horn or larger every four regulatory years **by bow and arrow only**.

What is the issue you would like the board to address and why? The purpose of this proposal is to maintain hunting opportunity for resident and nonresident hunters (when/if the moratorium is removed) while decreasing harvest in the Unit 19C sheep population that has felt a dramatic population decrease in recent years. The goal of this proposal is to transition Unit 19C general season sheep hunting to archery only.

Justification:

As our state sheep population continues to decline or remains low, archery can be a very valuable management tool that will maintain opportunity while reducing harvest impact.

During the 2022/2023 Board of Game meeting in Soldotna, a five year moratorium on nonresident hunters (Proposal 204) was passed because of significant concern that the sheep population was decreasing beyond sustainable limits despite Full Curl Management (FCM). While this five year

moratorium will likely substantially decrease harvest, it will also decrease opportunity for nonresident hunters. Going forward, an alternative would be to change Unit 19C to archery only. This will likely have an even more dramatic effect on sheep harvest (archery hunt success rates

for sheep are generally much lower). This will have zero adverse affect on opportunity because anyone who wants to hunt sheep in that area, including nonresidents will still be able to hunt. They will just have to use a bow instead of a rifle.

Of note, the success rate for nonresident hunting in these areas has been as high as 80% over the past five years and is consistently over 40% for resident hunters. These are extremely high success rates, higher than those for many other species in many parts of the state. Transitioning this area to archery hunting would allow for true fair chase hunting with decreased success rates but will maintain opportunity for *anyone* who wants to hunt it (they would just use a bow now). Skilled hunters who know how to pursue and stalk sheep will still kill rams but the overall take will be reduced due the increased difficulty.

***Regarding opportunity: in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and learning to shoot a bow. Those who wish to sheep hunt in Unit 19C who are not already among the thousands of Alaskans who enjoy bowhunting, can easily obtain equipment and proficiency. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks. This change will not adversely affect any hunters opportunity, it will just make the hunt a little more challenging and thereby decrease total harvest.

***Precedent: There are examples, both in and outside Alaska of the success of archery only sheep areas. In In Alaska, DS140/141 and DS240/241, which are bowhunting only draw hunts for any ram in an easily accessible area, the success rate over a ten-year period was about 2–3 rams per year for almost 70 tags awarded each year, and only a small fraction of the rams that were killed in these hunts would be considered legal in a full curl only area. Specifically, in the Eklutna area, where almost 70 hunters per year are allowed to bow hunt for any ram in an easily accessible area, there is still a steady population of mature rams despite all the hunting pressure. This is an example of how archery hunting allows for tremendous amounts of hunting opportunity with minimal impact on the animal population.

Similarly, there are very popular and well accepted hunts in Canada including the Canmore “Bow Zone” and the Todagin Mountain area of British Columbia. Both are over the counter archery sheep hunts that have proven popular with hunters and very affective in expanding hunter opportunity while having minimal harvest affect.

PROPOSED BY: Paul Forward (EG-F23-288)

Proposal 115 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 89.

PROPOSAL 115

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

Reopen the subsistence winter sheep hunts in Unit 19C as follows:

Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)

RS380

Oct. 1-Apr. 30

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

Reinstate:

One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323

RS380

Oct. 1-Apr. 30

This hunt was closed at the last Board of Game meeting along with closing the nonresident season against the opposition by Alaska Department of Fish and Game to this proposal of a five year closure to all hunters due to lack of biological reason for a closure. Reopening this hunt will allow local residents without use of aircraft traditional harvest of sheep. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition.

PROPOSED BY: Jeff Pralle (EG-F23-278)

Proposal 116 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 90.

PROPOSAL 116

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

Reopen the late season resident only subsistence sheep registration hunt RS380 in Unit 19C as

follows:

Reinstate RS380 Dall sheep hunt.

5 AAC 85.055 Unit 19C Sheep

Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)

RS380

Oct 1-Apr 30

What is the issue you would like the board to address and why? Reauthorize RS380. One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning September 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323.

The Alaska Department of Fish & Game advised the Board of Game in March of 2023 that there is no biological reason to close this hunt as well as the general season hunt for Dall sheep. Reopening this hunt will allow LOCAL residents to traditionally harvest sheep for subsistence needs. Historical use and harvest of RS380 is low with an average of two sheep taken a year. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition. The low harvest has no detrimental effects on the overall sheep population.

PROPOSED BY: Spencer Pape (EG-F23-300)

Proposal 117 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 91.

PROPOSAL 117

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

Modify sheep hunting opportunity in Unit 19C or other subunits in the western Alaska Range by implementing a sheep management plan as follows:

Unit 19C Sheep Hunting

- Guided nonresident bag limit- *management plan recommendation*
- Non-guided nonresident nag limit- *management plan recommendation*
- Resident nag limit- *management plan recommendation*
- Subsistence hunt bag limit- *management plan recommendation*
- Youth hunt bag limit- *management plan recommendation*

Guided nonresident season- *management plan recommendation*
Non-guided nonresident season- *management plan recommendation*
Resident season- *management plan recommendation* Subsistence season- *management plan recommendation* Youth hunt season- *management plan recommendation*

Sheep hunting Methods and Means-

Guided nonresident- *management plan recommendation*
Non-guided nonresident- *management plan recommendation*
Resident- *management plan recommendation*
Youth hunt- *management plan recommendation*

What is the issue you would like the board to address and why? This proposal is designed to provide a vehicle to address significant weather driven sheep declines in the western Alaska Range. In response to sheep declines the board has closed nonresident sheep hunting only for nonresidents for a period of five years. This closure is only allocative in nature and will not result in positive conservation outcomes for depleted sheep populations in the affected area.

The Alaska Professional Hunters Association (APHA) supports a more holistic and comprehensive approach to sheep management and conservation. The APHA is on record supporting the development of a western Alaska Range sheep management plan that could be limited to Unit 19C or expanded to other Unit subunits in the western Alaska Range. This proposal is designed to be a vehicle to be amended to incorporate the portions of such a plan that require Board of Game action.

PROPOSED BY: Alaska Professional Hunters Association (EG-F23-259)

Proposal 118 was deferred by the Board of Game from the March 2024 Interior and Eastern Arctic Region meeting. It was previously published as Proposal 92.

PROPOSAL 118

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

Close all nonresident sheep hunting in Unit 19 as follows:

Close all nonresident hunts for sheep in Unit 19.

What is the issue you would like the board to address and why? Declining numbers of legal rams in Unit 19. Over hunting plus harvesting of sub legal rams by guided nonresident hunters.

PROPOSED BY: Chris Bouch

(EG-F23-171)

Game Management Unit Boundaries

PROPOSAL 119

5 AAC 92.450. Description of game management units.

Change the boundary between Units 21E and 21D as follows:

5 AAC 92.450

...

(E) Unit 21(E) consists of that portion of Unit 21 in the Yukon River and Arhymot Lake drainages upstream from a line starting at the downriver boundary of Paimiut on the north bank of the Yukon River, then south across the Yukon River to the northern terminus of the Paimiut Portage, then south along the Portage to its intersection with Arhymot Lake, then along the northern and western bank of Arhymot Lake to the outlet at Crooked Creek (locally known as Johnson River) drainage, then to **and including all waters flowing into Honey Moon Slough, and to** but not including, the **Eagle Creek** drainage [BLACKBURN CREEK DRAINAGE], and the Innoko River drainage downstream from the Iditarod River drainage;

What is the issue you would like the board to address and why? Boundary change for Units 21E and 21D. Unit 21D has antler destruction, Unit 21E does not and does not want this restriction on Unit 21E. No other solutions discussed or wanted.

Residents in Grayling are having to travel 120 miles by boat to hunt in their old grounds, the Innoko River near the old Holikachuck Village. Grayling hunters now have to travel 120 miles by boat, if the Yukon, Shageluk Slough does not have enough water for travel, causing hunting issues on Anvik and Holy Cross corporation lands on the Yukon and Lower Innoko Rivers.

Residents of Grayling will be able to hunt the area now in Unit 21D under the permit RM836 if the boundaries are extended.

The GASH AC will have some say in the management of this area in question – trend counts, predator numbers and measures to help control bear and wolf populations.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes. Discussion by the committee was on two occasions, voted yes by all present. The chair was directed to proceed with proposal and have further talks with the area biologist.

Note: The advisory committee submitted maps with this proposal, which are available on the proposal book website at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook.

PROPOSED BY: Grayling/Anvik/Shageluk/Holy Cross (GASH) Fish and Game Advisory Committee (HQ-F24-039)

PROPOSAL 120

5 AAC 92.450. Description of game management units.

Change the boundary between Units 25C and 25D as follows:

Unit 25C: The drainages into the south bank of the Yukon River upstream from Circle to the Unit 20E boundary, the Birch Creek drainage upstream from the Steese Highway bridge (MP 147) and then following the Steese Highway to the northeast staying on the north side of the road from the Steese Bridge at MP 147 to Circle; the Preacher Creek drainage upstream from and including the Rock Creek drainage, and the Beaver Creek drainage upstream from and including the Moose Creek drainage.

What is the issue you would like the board to address and why? This realignment of the 25C/D boundary would reduce confusion on where the boundary is located as you drive between Central and Circle. The suggested fix would move the boundary to the road between Birch Creek and Circle, which would help to know exactly where the game Units start and end.

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

PROPOSED BY: Amanda Pope

(HQ-F24-011)

PROPOSAL 121

5 AAC 92.450. Description of game management units.

Divide Unit 15C into two subunits as follows:

Unit 15D consists of the current portion of Unit 15C south of Kachemak Bay, Sheep Creek, and the Dinglestadt Glacier.

What is the issue you would like the board to address and why? Divide Unit 15C to create two subunits, 15C and 15D, to align management boundaries with areas of stark physiographic differences of topography, climate, geology, vegetation, and wildlife species distributions and densities.

ADF&G utilizes the USGS Unified Ecoregions of Alaska map to depict Alaska's 32 ecoregions. An ecoregion is defined as "an area of land and water containing vegetation communities that share species and ecological dynamics, environmental conditions, and interactions that are critical for their long-term persistence."

North Unit 15C, overlays the Coast Mountain Boreal; Cook Inlet Basin ecoregion of gently sloping lowlands of lakes, swamps, bogs, and rivers drained from glaciers with an annual snowfall of 63 - 100 inches and total yearly precipitation averaging 15 - 27 inches.

15D (South 15C), would overlay two rugged ecoregions within the distinct Hyper-maritime Forests; the Chugach (Kenai) Mountains Ecoregion, with ice fields, narrow deep gorged valleys; fringed with the Gulf of Alaska Coastal Ecoregion, of deeply carved glacial fjords, archipelagos and short swift streams. Elevations dramatically rise from sea level to over 5,400 feet with a maritime climate. Annual snowfall averages 32 - 236 inches and total precipitation 30 - 160 inches.

Land ownership within the proposed Unit 15D area consists of primarily Kenai National Wildlife Refuge land, Kachemak Bay State Park and Wilderness Park land, and Alaska Native Corporation land.

Kachemak Bay waters and submerged intertidal lands are legislatively designated a State Critical Habitat Area (CHA) for the "perpetuation of fish and wildlife". This CHA overlays Special Purpose Site Park lands and waters located within the proposed Unit 15D.

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

PROPOSED BY: N.J. Hillstrand

(HQ-F24-006)

Proxy Hunting

PROPOSAL 122

5 AAC 92.011. Taking of game by proxy.

Allow proxy hunting for plains bison statewide as follows:

- (k) Proxy hunting under this section is only allowed for
 - (1) caribou;
 - (2) deer;
 - (3) moose in Tier II hunts, any-bull hunts, antlered-bull hunts without antler restrictions, and antlerless moose hunts;
 - (4) emperor geese;
 - (5) muskoxen in Tier II hunts; **and**
 - (6) plains bison.**

What is the issue you would like the board to address and why? At the 2024 Interior and Eastern Arctic Region Board of Game meeting in Fairbanks, the board passed a proposal to allow plains bison to be proxy hunted in that region. To reduce regulatory complexity the Department of Fish and Game proposes to allow proxy hunting for plains bison statewide. There are two plains bison populations outside of the Interior and Eastern Arctic Region (the Chitina herd in Unit 11, and the Copper River herd in Units 11 and 13D) and hunting opportunity for these populations is offered by drawing permit only, when a harvestable surplus exists.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-074)

PROPOSAL 123

5 AAC 92.011 (i). Taking of game by proxy.

Allow remuneration to be provided to proxy hunters as follows:

Solution: Remove language:

~~A person may not give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.~~

What is the issue you would like the board to address and why? Remove the language item (i). A person may not give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.

- 1) Irrelevant and outdated regulation that is no longer practiced or required.
- 2) Illegal on state lands but allowed on federal lands.
- 3) Provide more opportunity to meet needs of harvestable resources.

PROPOSED BY: Alissa Nadine Rogers

(EG-F24-008)

Permits for Bear Baiting

PROPOSAL 124

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

Change the term “permanent dwelling” to “permanent domicile” for the purpose of bear baiting as follows:

Change the wording Permanent Dwelling to Permanent Domicile as defined by AS 16.05.940. Definitions.

(11) "domicile" means the true and permanent home of a person from which the person has no present intention of moving and to which the person intends to return whenever the person is away; domicile may be proved by presenting evidence acceptable to the boards of fisheries and game;

You MAY NOT:

• Set up a bait station within 1 mile of a:

»house (including your own home),

»school,

»business,

»developed recreational facility,

»campground, or

»permanent domicile including a seasonally occupied cabin (including your own).

Establishing bait stations within 1 mile of a seasonally occupied cabin is allowed in some areas. (See page 27 for the list of places this is allowed.)

What is the issue you would like the board to address and why? According to the Regulations, a hunter MAY NOT place bait within 1 mile of a Permanent Dwelling. Currently there is no definition of what that is and multiple hunters have been charged for baiting within a mile of abandoned camps, outhouses, squatter cabins or other structures that may not fit the intended definition. This leaves this up to the Interpretation to the officer currently on duty and Hunters have been charged by One officer after having been cleared by others previously.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was brought up originally at the Southcentral Board of Game meeting and law enforcement and many communities members agreed on the need for to clarify this.

PROPOSED BY: Caleb Martin

(EG-F24-033)

The following proposal was deferred by the Board of Game from the March 2023, Southcentral Region meeting. It was previously published as Proposal 144.

PROPOSAL 125

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

Define "developed recreation facility" and "permanent dwelling" for bear baiting in Units 15 and 7 as follows:

I would ask the Board of Game to define “developed recreational facility” as a state-maintained multiuse area that provides services for shooting, launching of watercraft, or camping. It also must include signage and buildings that are regularly maintained for the purpose of recreation.

I would ask the board to define “permanent dwelling” as a structure permanently fixed in place, legally owned by the public or a private individual, and occupied for a minimum of 30 days per year.

What is the issue you would like the board to address and why? Currently for bear baiting in Units 15 and 7 the regulations read:

- 5) a person may not use bait or scent lures within
 - (A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;
 - (B) one mile of a
 - (i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on the opposite side of a major river system, as identified by the department in the permit, from the bear baiting station;
 - (ii) business; or
 - (iii) school; or
 - (C) one mile of a developed campground or developed recreational facility;

There is no definition of what a permanent dwelling or recreational facility is. When I spoke to three different Alaska Wildlife Troopers and multiple ADF&G offices, not only was there different answers, but several officials assumed it was up to the INTERPRETATION of the wildlife officers to determine how to define these areas. I have spoken to many members of the public who have spoken about getting fined or had to prove in court what is, or is not legal when it comes to these areas. One officer may determine a bait site legal, while another may charge a hunter. The regulations currently allow an officer to determine a duck blind, tree stand or any type of structure as a permanent dwelling with no recourse when the courts determine otherwise.

PROPOSED BY: Caleb Martin (EG-F22-130)

Unlawful Methods & Means

PROPOSAL 126

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide as follows:

5 AAC 92.080. The following methods of taking game are prohibited:

(7) with the aid of.....

(E) electronically enhanced night vision; **except that electronically enhanced night vision can be used for taking furbearers;**

(F) any forward looking infrared device; **except that forward looking infrared devices can be used for taking furbearers;**

What is the issue you would like the board to address and why? The Board of Game adopted proposal 52 in March 2024 to allow the use of electronically enhanced night vision and forward looking infrared devices for Region III. This proposal requests the board expand that opportunity to statewide. There is a small but growing number of hunters in other regions that would benefit from the adoption of this request.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was supported by several hunters and will be presented at the next local advisory committee meeting.

PROPOSED BY: Ted Spraker

(EG-F24-040)

PROPOSAL 127

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide as follows:

We are proposing 5AAC 92.080(7)(C) artificial light, except that artificial light, night vision goggles, and forward-looking infrared devices may be used:

(I) for the purpose of taking furbearers under a trapping license during an open season November 1 - March 31 in all units.

What is the issue you would like the board to address and why? Make the Region III changes apply statewide. The board discussed, amended and passed this proposal for some units at its recent Region III meeting. This proposal could/should be applied to all units unless there is a unit specific reason not to do so.

The original intent was, and is, to provide more opportunity for harvest when short "daylight" hours restrict opportunity. Adding the use of night vision devices as they are now defined in the regulation for some units to the exceptions under unlawful methods would allow hunters and trappers many more hours each day besides what is defined as "daylight". There are healthy populations of furbearers and the harvest would be sustainable and provide additional "reasonable opportunity" for harvest personal use and subsistence. We anticipate that any additional harvest would not be a conservation issue. This change would be expected to add some burden on the Alaska Wildlife Troopers.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Local committee and discussions with trappers and some Board of Game members.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (EG-F24-054)

PROPOSAL 128

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of night vision and thermal optics taking furbearers statewide as follows:

Proposed solution:

Night vision and thermal optics may be used to take furbearing animals with a trapping license during open trapping seasons in all game management units and sub-units.

What is the issue you would like the board to address and why? The taking of furbearing animals with night vision or thermal devices should be allowed with a trapping license in all game management units not just a select few that was permitted in earlier game review board.

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

PROPOSED BY: Don Coatney (EG-F24-039)

PROPOSAL 129

5 AAC 92.085. Unlawful methods of taking game; exceptions

Establish a minimum standard of centerfire rifle cartridges for taking big game as follows:

Legal rifle cartridges for big game must have a barrel bore of at least .25 inches and be chambered to fire a centerfire cartridge of not less than two inches overall length including the bullet which is designed to expand.

What is the issue you would like the board to address and why? I have personally been aware of several moose that were shot and lost after being hit with too small of a caliber rifle. Some were shot several times with .223 rifles. The shooters in some cases said, "They shot an entire AR-15 magazine of ammo but must have missed."

I recovered two moose that a shooter said they must have missed. I had people tell me about shooting a brown bear over "eighteen times with a .223 and then it died slow."

I have spent 16 years summer through fall in rural Alaska. I have heard about the lack of moose-hunting opportunities. The waste of game due to the use of insufficient cartridge size is a significant contributor to the dwindling game populations. A larger cartridge size would reduce the loss of animals significantly. Most state game regulations require a cartridge minimum size for big game hunting. Alaska, having the largest big game animals surely should also establish minimum cartridge sizes.

PROPOSED BY: Robert Hammond (EJ-F23-679)

PROPOSAL 130

5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Establish a minimum standard of centerfire rifle cartridges for taking moose as follows:

A minimum of .243 caliber rifle is required for taking of moose.

What is the issue you would like the board to address and why? We would like an established minimum caliber requirement for moose statewide as follows: Require a minimum of .243 caliber centerfire rifle for the harvest of moose.

Unfortunately, moose are shot with rifles and ammo that inadequate to kill them.

Moose are one of the largest North American big game species and unfortunately, some moose are shot with rifles and ammo that are inadequate to kill them. The common rifle to hunt moose in some parts of the state is the .223 Remington. With the high number of variables, perfect shot placement is not a guarantee every time a trigger is pulled, and often can end in a dead and

unharvested moose with the .223. Because of this, the true number of moose killed is higher than what is reported at harvest, thus negatively impacting the number of moose that can be harvested.

Finally, one of the most common uses of the .223 and other centerfire 22 caliber rifles and smaller in North America is predator/varmint hunting. As a result, a majority of the ammo loaded commercially for the .223 use hollow point or other fragmenting ballistic tip bullets, none of which are made for the deep bone breaking penetration needed to effectively kill moose. Rather, ballistic tip and hollow point bullets so commonly loaded for the .223 are designed to penetrate and explode inside the body of the coyote, fox or other predator/varmint targeted. Frequently, when these types of bullets are used for big game, especially moose, the targeted animal is maimed by a bullet that comes apart before getting adequate penetration to effectively kill the moose.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This is a proposal is by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-018)

PROPOSAL 131

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags be attached to traps and snares as follows:

5 AAC 92.095 should be amended to add a provision stating as follows:

A person may not set a trap or snare unless there is attached to the trap or snare an identification tag. Identification tags must provide either the person's name, or a personal identification number (PIN) registered with the Alaska Department of Fish and Game. The Department will make identities of trappers who register their traps and snares with the Department available to law enforcement, but otherwise keep identities confidential except in circumstances where children or pets are trapped or snared, in which circumstances the identity of the owner of the trap or snare shall be released to the parent of a child caught in a trap or snare, or a pet owner whose pet has been caught in a trap or snare..

What is the issue you would like the board to address and why? The need for identification of illegally set traps and snares to assist law enforcement; and also pet owners and parents whose pets and/or children are caught in traps or snares.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I submitted a similar proposal previously, and law enforcement very strongly supported the proposal when it was considered by the Board of Game at the January 2022 meeting held in Wasilla. I am a member of the Anchorage Advisory Committee and a member of its Game subcommittee, the Anchorage Advisory Committee does not meet again until October 2024, and does not usually submit proposals, I expect the game subcommittee and full advisory committee will support this proposal when we review the proposal book.

PROPOSAL 132

5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit nonresidents from using snowmachines to approach and pursue the take of wolves and wolverine as follows:

Section 5 AAC 92.080 - Unlawful methods of taking game; exceptions.

The following methods of taking game are prohibited:

(4)(B)(ix) **Alaska residents may use** a snowmachine [MAY BE USED] to approach and pursue wolves and wolverine; an approach and pursuit under this sub-subparagraph is not harassment under (5) of this section, but may not come in contact with a live animal;

Limit the trapping methods and means exception to taking of wolves and wolverines by use of a snowmachine to approach and pursue animals to only Alaska residents.

What is the issue you would like the board to address and why? The trapping methods and means exception for use of a snowmachine to approach, pursue and take wolves and wolverines affords nonresident trappers an improper and unfair advantage in the taking of free ranging wolves and wolverines, counter to basic hunter and trapper ethics and contrary to fair chase.

A key reason this trapping methods and means exception was allowed for wolves and wolverines was for subsistence users. As written, the methods and means exception also granted nonresidents in all game management units the legal authority to run wolves and wolverines to exhaustion, which is accepted as an unethical method of taking game. Nonresident hunters and trappers should not be afforded this exception and should be held to basic fair chase principles including taking any free ranging wild game animal in a manner that does not give the hunter an improper or unfair advantage over the game animals. Subsistence methods and means for the take of fish and game often allow an unfair advantage, but such advantages should not be afforded to nonresident users.

What will happen if nothing is done? Nonresidents will continue to be allowed to use a snowmachine to chase wolves and wolverines to exhaustion, counter to basic hunter and trapper ethics.

Who is likely to benefit? Resident trappers

Who is likely to suffer? Nonresident trappers

Other solutions considered? Rescind exception to methods and means to approach and pursue wolves and wolverine by snowmachine to all trappers. I don't believe removing this exception for all trappers is likely to gain much support by subsistence users in rural areas of the state.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This has been a topic of conversation in the area since the positioning regulation was adopted. I have received input from other residents and trappers who feel the pursuit of wolverines and wolves by snowmachine is an unethical method of taking game.

PROPOSED BY: Rick Grant (EG-F24-051)

PROPOSAL 133

5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit the use of snowmachines to approach and pursue wolverine as follows:

Section 5 AAC 92.080 - Unlawful methods of taking game; exceptions.

The following methods of taking game are prohibited:

(4)(B)(ix) A snowmachine may be used to approach and pursue wolves [AND WOLVERINE]; an approach and pursuit under this sub-subparagraph is not harassment under (5) of this section, but may not come in contact with a live animal;

What is the issue you would like the board to address and why? Rescind trapping exception in methods and means allowing the approach and pursuit of wolverines by snowmachine. This exception for use of a snowmachine affords trappers an improper and unfair advantage in the taking of wolverines, counter to basic hunter and trapper ethics and contrary to fair chase.

What will happen if nothing is done? Trappers will continue to be allowed to use a snowmachine to chase wolverines to exhaustion, counter to basic hunter and trapper ethics.

Who is likely to benefit? n/a

Who is likely to suffer? Trappers

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This has been a topic of conversation in the area since the positioning regulation was adopted. I have received input from other residents and trappers who feel the pursuit of wolverines by snowmachine is an unethical method of taking game.

PROPOSED BY: Rick Grant (EG-F24-053)

Hunting & Other Permits

PROPOSAL 134

5 AAC 92.069. Special provisions for moose and caribou drawing permit hunts.

Allocate 90% of all moose drawing permits to residents as follows:

Issue 90% of moose drawing permits to Alaska residents.

What is the issue you would like the board to address and why? The issue I'd like to address, on a statewide basis, is the allocation of primary meat animals in drawing hunts as spelled out in 5 AAC 92.069.

Moose drawing permit allocations should reflect food security needs for Alaskan residents. As a primary meat animal, there is no reason to allocate half of the moose in any given draw hunt to outside hunters, many if not most of whom do not want the meat. This is currently in practice, most egregiously in Unit 21B as spelled out in AAC 92.069(b)(3). I'd like the Board of Game to consider, during drawing permit distributions, a more reasonable share of these important subsistence animals: 90% guaranteed to residents of the State of Alaska. Other allocation solutions considered are numbers of 80 or 75 percent, as for caribou in 92.069(c), although I feel these are too low.

I understand the normal rationale for draw hunts; that there are not enough animals to satisfy the demand of a general season hunt. I also understand another rationale for draw hunts; the economic security of commercial users, and also that when hunts go to draw for "trophy" purposes, or to effectively add a new animal to the "must be guided" class as exists in statute, that there are often other opportunities available. One primary problem with this second rationale is that those additional opportunities, on federal land, are weighted to local residents, not equal access to all Alaskans as per state mandate. Another is that all harvesters should be able to use all parts of the animal to meet their needs, be it meat for the freezer, hide for clothing or sewing, or bones and antlers for hardware, handicrafts, decoration, and medicinal use. This is limited in some of those additional opportunities, along with adding onerous reporting and specimen requirements.

In summary, state regulation in 5 AAC 92.069 should be amended to reflect the prevailing guidance of the Alaska Supreme Court (McDowell 1989) and the Constitutional provisions of Alaskans' common use, maximum use, and maximum benefit clauses by the Board of Game using its authority to protect the harvest needs of all Alaskans, prioritized over those of nonresidents of the state, by issuing 90% of moose draw permits to resident Alaskans.

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

PROPOSED BY: Douglas Malone

(EG-F24-065)

PROPOSAL 135

5 AAC 92.050 (a)(4). Required permit hunt conditions and procedures.

Allocate 10% of the big game permits to nonresidents as follows:

Nonresidents shall be guaranteed 10% of the available permits for each hunt as long as a hunt has at least 10 permits. If a hunt has less than 10 permits no nonresident tag will be issued. If the number of nonresident permits is not a round number, it shall be rounded down to the next round number.

This is consistent with most other Western states in the United States. This language shall not apply to hunts already allocated specifically to nonresidents either guided or unguided. In the case of drawing hunts with less than 10 permits the Department of Fish and Game shall have the authority to issue up to one permit specifically for nonresidents granted it does not take a resident permit away to meet the original permit quota. This language, because it would set aside permits for nonresidents would be less restrictive than many western states that allow UP TO 10% of the permits to be allocated to nonresidents.

What is the issue you would like the board to address and why? Nonresident drawing permit allocation is uncapped in many drawing hunts. Currently there are many drawing hunts that have no nonresident allocation limits. Alaska residents are finding it increasingly difficult to draw permits. Nonresident allocations in the lower 48 have been drastically reduced in the last five years resulting in more interest by nonresidents to hunt and apply in Alaska. The current regulations are unit or hunt specific as it relates to nonresident allocation thus making it difficult and cumbersome to address in the usual regional proposal process.

Did you develop your proposal in coordination with others, or with your local fish and game advisory Committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-084)

Note: Alaska Statute 16.05.340 establishes fees for hunting permits.

PROPOSAL 136

5 AAC 92.050. Required permit hunt conditions and procedures.

Limit bison and musk ox drawing permit hunts to once in a lifetime, and only allow applicants to apply once per hunt as follows:

First, make it a lifetime hunt, one and done. Second, get rid of the multiple chance drawings and just increase the price to \$50.00 for a chance. It would still create plenty of revenue and there would be folks still trying to get this fabulous draw.

What is the issue you would like the board to address and why? Since the musk ox and the bison tags are so hard to get; why doesn't the state do two things for the hunters to give them a realistic chance to hunt these animals.

I have been putting in for this draw for 18 years and not successful and yet others have had multiple draws to hunt them. There is also another option to make it a one per household also. I just read today where my co-worker and husband both drew for bison. It is just my opinion but I would like a real chance to get one. Thanks for letting me vent.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We often talk about it at work and with others that I am friends with that share my concerns.

PROPOSED BY: Russel Hawkins (EG-F24-003)

PROPOSAL 137

5 AAC 92.050. Required permit hunt conditions and procedures.

Change the drawing hunt permit process as follows:

Options and alternative strategies to consider either singly or in combination:

1. Increase waiting period(s) by species if successful in harvest and/or draw.
2. Reduce application number by species (e.g., 6 to 4)
3. Restrict applications for one applicant (or party) to maximum of three species per draw application year.
4. Restrict applications to apply for bison OR muskox, caribou OR elk, and/or sheep OR goat per draw application year.
5. Reduce resident bag limit for bison to once-in-a-lifetime if successful in harvest of a bison on a resident draw permit.
6. Increase opportunity for additional registration hunts with quotas where possible as an alternative to draw hunts.

Other options considered:

1. Bonus Point System - previously considered by Board (several different meetings).
2. Create and establish separate draw hunts for longtime applicants - requires tracking applicant history and possibly establishing a "hunter identification number".

Options rejected:

1. Preference Point System - previously considered by Board (same as above).
2. Once-in-a-lifetime drawing with unsuccessful harvest.
3. Long waiting periods for successful moose draw applicants.

What is the issue you would like the board to address and why? The probability of successfully drawing a hunt permit (for most of the current hunts offered) has become exceedingly difficult over the last several years. In 2018, there were 321,126 applications for 8,302 draw permits. Just five years later (2023), there were 373,511 applications for 5,216 draw permits - an overall average

reduction of almost half from 2.6% to 1.4%. The majority of the most desirable draw hunts have seen significant reductions in drawing opportunity. For example, DM410 (antlerless moose) has shown an increase from 2013 to 2023 of 2,628 applications for 75 permits to 8,674 for 100. Similarly, DC590 (caribou) has went from 906 applications for 100 permits (2013) to 9,248 for 100 (2023). Others include DE702 (elk) - 627 applications/8 permits (2013) to 3394 applications/6 permits, DI403 (bison) - 11,320 applications/50 permits to 33,306 applications/60 permits, and DS123 (sheep) - 560 applications/1 permit to 3,127 applications/1 permit.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal was developed in consultation with local hunters interested in improving the opportunity to be successful in the hunt permit drawing. The alternatives were created to stimulate discussion at the Board of Game meeting to encourage action to address the significant reduction in drawing opportunity for the average resident hunter. The local fish and game advisory committee has not consulted at this time nor is aware of this proposal.

PROPOSED BY: Gary Feaster (EG-F24-011)

PROPOSAL 138

5 AAC 92.016. Musk oxen tag fees.

Remove the requirement for a locking tag in subsistence hunts for musk ox as follows:

5 AAC 92.016. Musk oxen tag fees. The resident tag fee for hunting musk oxen by registration permit on Nelson Island and on Nunivak Island is \$25. The Board of Game waives the resident tag [FEE] for subsistence musk oxen hunting.

or

5 AAC 92.016. Musk oxen tag fees. The resident tag fee for hunting musk oxen by registration permit on Nelson Island and on Nunivak Island is \$25. **A resident tag is not required for taking musk oxen in subsistence hunts.** [THE BOARD OF GAME WAIVES THE RESIDENT TAG FEE FOR SUBSISTENCE MUSK OXEN HUNTING.]

What is the issue you would like the board to address and why? The current regulation waives the resident tag fee for hunting musk oxen in subsistence hunts yet still requires the hunter to have the locking tag in their possession and to lock it onto the portion of the animal required to be salvaged if successful. AS 16.05.340(a)(16)(B) allows the board to reduce or eliminate the resident big game tag and fee for musk oxen for all or a portion of a game management unit. The board waived the tag fee for subsistence hunts but did not waive the tag requirement. The Department of Fish and Game implemented the regulation by telling permit holders the tag is not required, which is technically incorrect. This proposal is an attempt to align the regulation with how the

department is administering the regulation, and in the manner that is the least cumbersome for the hunters.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-084)

Salvage, Sealing & Sale of Game

PROPOSAL 139

5 AAC 92.150. Evidence of sex and identity.

Change the evidence of sex requirements for horned big game animals as follows.

Evidence of sex naturally connected to part of the hindquarter is not required for horned animals (sheep, goat, muskox). Horns are evidence of sex and must be kept with the meat until processed for human consumption. Horns may be transported simultaneously with final load of meat.

What is the issue you would like the board to address and why? Sex organs are not considered edible meat. This adds to more bacterial growth in the field. Heavier pack outs. This is already not required for sheep. Where horns are enough to show evidence of sex, this statute is inconsistent with goats and musk ox.

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

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-017)

PROPOSAL 140

5 AAC 92.150. Evidence of sex and identity.

Eliminate the evidence of sex requirement for big game having bag limits restricted to one sex as follows:

The solution is fairly simple. Stop requiring evidence of sex to be left on big game animals when the hunt is limited to a single sex. When this regulation was put into place, DNA testing was not very common and was cost prohibitive. Today though, for <\$100, a sample of muscle can be submitted to a lab and the sex determined easily and relatively quickly. If the Alaska Wildlife Troopers were suspicious of meat that was claimed to be from a male when in fact was a female the Troopers could take a sample from every single quarter and any other piece of the meat that they felt suspicious of and determine if ALL meat was from the same sex. Further, if the Troopers felt meat came from another male, not associated with the antlers or horns they accompany, they could submit the samples for a single nucleotide polymorphism (SNP) markers analysis. This is a common technique in wildlife forensic science. Simply put, you could use DNA to test if the skull matched the meat.

Regardless of the method used, this genetic testing is much more versatile for troopers in the field and provides much better data than simply leaving a bit of gender identifying tissue on a single hindquarter.

Another factor that could be considered is to change the definition of the evidence of sex to include horns or antlers. Currently only the horns of a Dall sheep are considered as evidence of sex. Ironically, both male and female Dall sheep have horns so it does not make sense for moose antlers to not count as evidence of sex.

Ultimately, this proposal will simplify the hunters responsibility to care for their meat in the field and will not limit the Troopers ability conduct an investigation when suspicious of an illegal activity. The advances in DNA testing make this regulation obsolete.

What is the issue you would like the board to address and why? We would like to address the requirement to leave evidence of sex on moose. There are multiple issues with this regulation that I will mention here.

1. One option is to leave the penis attached to a hind quarter as evidence of sex. When choosing to leave the penis you must cut through the penis to have a section to leave on the hind quarter. When cutting through the penis there is always a small amount of urine that comes out and that comes in contact with your meat. This is less than ideal from a meat care standpoint. The tissue of the penis is one of the first places that bacteria will begin to cause spoilage and this can more easily infiltrate the meat once it is started. This is exacerbated when on a longer hunting trip.
2. The second option is to leave a testicle on a hind quarter. The testicles are connected very loosely by tissue that can be easily torn from the hindquarter once the quarter is removed from the animal and during hanging and transport. Besides the delicate nature of their connection to the meat, the testicle can also be one of the first places to spoil and in turn begin to spoil the meat. Again, this is exacerbated when on a longer hunting trip where the meat care is already difficult. Finally, leaving a testicle on the hind quarter does not allow them to be eaten in camp which is a tradition for many and ultimately ruins the testicle for consumption later on because they spoil faster than the rest of the meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? We talked about this at the March Fairbanks Advisory Committee meeting. The committee was in favor of this change as written.

PROPOSED BY: Lance Nelson (EG-F24-013)

PROPOSAL 141

5 AAC 92.135(a). Transfer of possession.

Allow the transfer of possession of game meat and game parts to be captured in a digital video format or on paper as follows:

Amend **5 AAC 92.135(a)** for both permanent (given as a gift) or temporary transfer for the purpose of transport to be conducted electronically via video recording on a smart phone or tablet. This would not replace the paper forms but would also be recognized as an acceptable Transfer of Possession.

Both hunter and recipient would simultaneously record video on their smart phones or tablets. The hunter would state all of the information requested on the paper form: Date, name, hunting license #, address/city/state/zip, species taken, specific parts of the animal being transferred, date of kill, kill location, whether it is a permanent or transport transfer, and the recipient's name and address/city/state/zip.

The hunter and recipient would be able to save the video on their smart phone or tablet as proof of Transfer of Possession. Upon request by law enforcement or an ADF&G official, the video could be reviewed for proper Transfer of Possession.

The ability to video the Transfer of Possession on a smart phone or tablet would provide proof of the Transfer of Possession. Videos on smart phones and tablets are also date & time stamped, which would provide further proof.

The new regulation would now read:

5 AAC 92.135(a) *for both permanent (given as a gift) or temporary transfer for the purpose of transport may be filled out on the paper form provided in the Alaska Hunting Regulations booklet or conducted electronically by video recording on a smart phone or tablet. All information requested on the paper form must be clearly stated and recorded by the Hunter. The Hunter and Recipient shall retain the video as proof of Transfer of Possession.*

What is the issue you would like the board to address and why? To provide a secondary method to the Transfer of Possession of game meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No. I just believe many people have their smart phones or tablets within the field for photos, etc. and that video with audio is much better proof than a piece of paper. It also gives the hunter and recipient a secondary or back-up method to perform the Transfer of Possession should paper forms not be available.

PROPOSED BY: Regg Simon

(EG-F24-004)

PROPOSAL 142

5 AAC 92.031(h). Permit for selling skins, skulls, and trophies.

Allow for the sale of legally harvested big game trophies without a permit as follows:

[(h) A PERSON MAY SELL A LAWFULLY HARVESTED PREPARED BIG GAME TROPHY IF THAT PERSON FIRST OBTAINS A PERMIT FROM THE DEPARTMENT]

What is the issue you would like the board to address and why? Repeal (h). There is no data suggesting that there is an issue with Alaskans selling their big game trophies. Repealing this section would benefit the ADF&G Division of Wildlife Conservation staff.

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

PROPOSED BY: Russell Knight

(HQ-F24-024)

PROPOSAL 143

5 AAC 92.200. Purchase and sale of game.

Allow for the sale of legally harvested big game trophies without a permit as follows:

- (a) In accordance with AS 16.05.920(a) and 16.50.930(e), the purchase, sale, or barter of game or any part of game is permitted except as provided in this section.
- (b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale:
 - (1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear, and except skulls and hides with claws attached of brown bears harvested in area where the bag limit is two bears per regulatory year by permit issued under 5 AAC 92.031;
 - (2) **except a lawfully harvested big game trophy. [, OR A BLACK BEAR TROPHY OF ANY KIND];**
 - (3) **except a lawfully harvested big game trophy animal** -skull, except [THE -SKULL OF A BLACK BEAR, WOLF, OR WOLVERINE, OR] a horn or antler that is still attached to any part of the skull, **that in not a trophy;**
 - (4) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
 - (5) unsealed marten taken in Units 1 – 7, and 15, or unsealed fisher taken in Units 1 – 5, except as provided in 5 AAC 91.170(a);
 - (6) unsealed beaver taken in Units 1 – 11 and Units 13 – 17;
 - (7) unsealed land otter, lynx, wolf, or wolverine;
 - (8) the meat of big game and small game, except hares and rabbits;
 - (9) the gall bladder of a bear.
- (c) A person may not barter, advertise for barter, or otherwise offer for barter
 - [(1) A BIG GAME TROPHY, OR A BLACK BEAR TROPHY OF ANY KIND;]
 - (2) The antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
 - (3) the gallbladder of a bear.

What is the issue you would like the board to address and why? If 5AAC92.031(h) is repealed. We have suggested amendments to 5 AAC 92.200 The purchase and sale of game. To still allow the sale of trophies without a permit requirement.

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

PROPOSED BY: Russell Knight (HQ-F24-023)

PROPOSAL 144

5 AAC 92.031. Permit for selling skins, skulls, and trophies.

Shorten the time period from six months to 60 days for taxidermist to obtain a permit to sell unclaimed furs, skins, and trophies as follows:

- (a) A licensed taxidermist may sell unclaimed, finished skin or trophy under a permit issued by the department after the finished skin or trophy has been held unclaimed for [SIX MONTHS,] **60 days**, and after the taxidermist sends notice of intent to sell, by registered mail at least 15 days before the sale, to the last known address of the person who ordered the taxidermy work.

What is the issue you would like the board to address and why? Currently, a taxidermist has to wait SIX months or about 183 days for a customer who fails to pay on time, Before the taxidermist can take lawful steps in possibly recouping cost associated with the commissioned piece. This burdensome and unreasonable to expect a business to operate with such long restrictions in order to receive compensation for finished commissions.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Contacted Precision Taxidermy, Kin’s Taxidermy, B. Bear Tax, Knight’s Taxidermy, Gunsmoke Taxidermy, etc. etc.

PROPOSED BY: Josh Livingston (HQ-F24-046)

Permits for Possessing Live Game (Clean List)

PROPOSAL 145

5 AAC 92.029. Permit for possessing live game.

Add Eurasian Eagle to the list of animals allowed to be possessed in Alaska without a permit as follows:

Add Eurasian Eagle – Owl (Bubo bubo) onto the clean list.

What is the issue you would like the board to address and why? I request that the Eurasian Eagle-Owl (Bubo bubo) be added to the clean list (5 AAC 92.029). Falconers often host educational programs that help positively impact the conservation and public awareness of raptors worldwide. As a falconer in Alaska, I frequently organize and provide educational demonstrations about raptors, including their biology, ecological roles, and conservation. Currently, falconers are prohibited from receiving payment for their presentations with native species of raptors. However, importing and possessing these non-native species would become legal without a permit if the Eurasian Eagle-Owl (Bubo bubo) is added to the clean list. This would enable payment for conservation talks.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Bennett Wong

(EG-F24-092)

PROPOSAL 146

5 AAC 92.029. Permit for possessing live game.

Exempt sterilized cats from the list of species prohibited from being released into the wild as follows:

5 AAC 92.029. Permit for possessing live game.

Exempt sterilized cats from the list of species prohibited from being released into the wild.

What is the issue you would like the board to address and why? Feral cats are impacting communities across the state, and there is broad agreement it's in both their and our best interest to reduce their numbers. They can be disease vectors and predate on local wildlife; their presence can also be distressing for people, all of which is evidenced by this issue having come before the Board of Game several times before. I'm submitting a proposal in support of TNR (Trap-Neuter-Release) practices yet again because of Juneau's growing feral cat problem and my own first-hand experience.

The board permitting the release only of sterilized cats back to the wild would not increase feral cat numbers. It might reduce them. I can say plainly that allowing TNR in Juneau might have helped prevent the establishment of a feral cat colony in my neighborhood, and it certainly would not have made it worse. I have worked with animal control, the local humane society, and at least two vets in town attempting to reduce or limit a nearby cat colony, so I'm familiar with how the prohibition on releasing feral cats directly translates to inaction and a growing problem.

In 2022, the board expressed reluctance to allow the release of strays, citing their quality of life. However, trap-and-euthanize is already allowed, and is not sufficiently addressing the problem on its own. It is also broadly unpalatable to the public, which is always going to limit its efficacy. An open season on cats as deleterious wildlife, another proposal the board has seen before, is not practicable for similar reasons of palatability as well as its numerous undesirable side effects, like hunting pets for sport. In Juneau, there is will and enthusiasm here to see if we can solve this problem humanely, balancing reducing numbers with outright killing.

TNR may not be appropriate for all communities, but allowing this choice to be implemented locally would allow communities to create right-sized solutions for their particular situations. In Juneau, for example, when the shelter is overfull with kittens, stray cats simply go unsterilized (as they can be neither housed nor released). Allowing the release of sterilized cats would allow a spectrum of action, from motivated individuals helping neuter colonies in their neighborhood to a full TNR program.

This is currently illegal, which I clarify because in 2022, the board heard that anyone can trap and neuter stray cats. This is not true; because releasing stray cats is illegal, those who are able to sterilize them cannot and do not do so. More, agencies such as animal control in Juneau undertake enforcement, prohibiting access to traps and veterinary services and threatening trooper action on individuals. This is counter to everyone's goals in reducing feral cat numbers.

The board has heard requests from individuals and the municipality of Anchorage to have this tool made legal. We hear and understand department objections, which previously have been that vaccine boosters cannot be guaranteed, and that high rates of sterilization may be required for TNR to be deeply effective. I also understand the board's reluctance to allow the trapping of an animal if it is to be released back to a life of suffering. Neither of these does anything to reduce feral cat numbers or their suffering. However, TNR is a tool Alaskans have repeatedly asked the board to permit us to try. There is less harm in allowing individual communities to attempt to fund and find their own solutions with this tool than continuing a blanket prohibition that clearly isn't effective enough.

I would support any amendment to regulation that permits implementation of humane TNR practices with whatever surgical language the board feels appropriate to both protect our wildlife and support reduction of feral cats in Alaska. Thank you for your time & service.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have worked with neighbors, community members, the humane society,

and vets in trying to find a solution for feral cat colony in my neighborhood. The proposal is mine, though many referenced in the regulation and weren't familiar with how to change it.

PROPOSED BY: J. Rintala (EG-F24-024)

PROPOSAL 147

5 AAC 92.029. Permit for possessing live game.

Delegate authority from the Board of Game to the Commissioner of the Department of Fish and Game as follows:

The Department of Fish and Game (department) proposes to have the Board of Game (board) utilize statute AS 16.05.270 to delegate its authority to manage 5 AAC 92.029, commonly referred to as the clean list, to the Commissioner.

What is the issue you would like the board to address and why? Delegating authority to the Commissioner would allow the department to evaluate requests for additions to the clean list in a timely manner. For each proposal the board receives to add a species to the clean list, the department conducts a thorough review of the species. If authority is delegated to the commissioner, the department will conduct the same level of review for each request received.

The Governor's office submitted Executive Order 124 to the legislature in 2024 to move AS 16.05.255(a)(8) from the *Regulations of the Board of Game; management requirements* to AS 16.05.050 the *Powers and duties of the commissioner*. Both the House and Senate jointly rejected the executive order. Delegating the authority from the board to the commissioner as proposed is much narrower than the executive order was, and limits the scope to only those species allowed to be possessed without a permit.

This proposal is an opportunity for the board, advisory committees, the public and the department to collaborate on the best ways to meet the requests of the public when it comes to which species should be allowed to be possessed without a permit in this state.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-085)

Intensive Management

Note: Conducting management activities and exercising administrative authority to implement intensive management plans are legislatively authorized powers of the Department of Fish and Game and are not regulations subject to the Administrative Procedure Act.

PROPOSAL 148

5 AAC 92.110(e). Control of predation by wolves.

Impose certain conditions on the commissioner's ability to implement an intensive management plan following its adoption by the Board of Game as follows:

Modify and amend 5AAC 92,110(e) to provide as follows: (e) After the board has adopted a predation control implementation plan, the commissioner may, at any time during the period for which the plan is in effect, determine whether to implement the plan: but only (i) if the commissioner finds that the conditions specified in AS 16.05.255(e) apply at that time; and (ii) in the event the commissioner determines to authorize the use of aircraft and/or the taking of wolves from aircraft the same day airborne, the commissioner also finds that the conditions specified in AS 16.05.783(a) apply at that time. Before proceeding with implementation, prior public notice of the commissioner's determination and findings must be given, and the public given the opportunity to comment as provided in the Administrative Procedures Act.

What is the issue you would like the board to address and why? In Unit 15C, and in other units, the Board of Game has avoided the mandatory provisions of Alaska Statutes 16.05.255(e) and AS 16.05.783(a) when approving intensive management plans, apparently relying on representations by the Department of Fish and Game that the intensive management (IM) plan will be inactive until the commissioner implements the IM plan. 5AAC 92.118(c) which was adopted by the Board of Game at its March 2023 meeting, and which provides for intensive management of moose and control of wolves, including aerial and same day airborne taking of wolves, is a good example of a plan where the board appears to have relied on the department's representations that the IM plan would be inactive. The problem is that by approving IM plans intended to be inactive until the Commissioner makes the determination to implement the plan, the Board of Game has been delegating its nondelegable obligations set forth in these two statutes to the commissioner: who can then commence active predator control, including the use of aerial and same-day airborne taking of wolves, in the commissioner's sole discretion, without going through any public process and without providing prior notice to the public, and the opportunity for public comment as provided in the Administrative Procedures Act.

If nothing is done, the violation of the mandatory provisions contained in these two statutes will continue throughout the state. No other solution to this problem is possible; that is with the exception of litigation, which is ongoing at this time, namely April 30,2024. Adoption of this proposal might make most of the substantive issues of that litigation moot.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? The Anchorage Advisory Committee doesn't meet again until October, and

ordinarily doesn't make proposals. The undersign is a member of the Anchorage Advisory Committee and is on the Game Subcommittee; and believes that a majority of the Anchorage AC will support this proposal, although there will be dissent and perhaps modifications.

PROPOSED BY: Kneeland Taylor

(EG-F24-064)

Advisory Committee Jurisdiction for Antlerless Moose Hunts

PROPOSAL 149

5 AAC 98.005. Areas of jurisdiction for antlerless moose seasons.

Add the Nushagak and Togiak ACs to the applicable subunits for authorizing antlerless moose hunts, and move the Stony/Holitna AC from the Western Region to the Interior Region as follows:

5 AAC 98.005. Areas of jurisdiction for antlerless moose seasons. (a) For the purpose of implementing AS 16.05.780, antlerless moose seasons require approval by a majority of the active local advisory committees for the affected game management unit or subunit. For the purpose of this section, an "active local advisory committee" is a committee that holds a meeting and acts on the proposal. The following advisory committees as established in 5 AAC 96.021, have jurisdiction over antlerless moose hunts in the units and subunits specified in this section:

...

(3) in the Southwest Region

...

(B) Unit 17: Nushagak, Togiak

(i) committees with represented communities in subunit 17(A): Togiak

(ii) committees with represented communities in subunit 17(B): **Nushagak**

(iii) committees with represented communities in subunit 17(C): Nushagak **and Togiak**

...

(4) in the Western Region

...

(B) Unit 19: Central Kuskokwim[, STONY/HOLITNA]

...

(v) committees with represented communities in subunit 19(E): **None** [STONY/HOLITNA];

...

(6) in the Interior Region

...

(B) Unit 19: McGrath, **Stony/Holitna**

...

(v) committees with represented communities in subunit 19(E): Stony/Holitna

...

What is the issue you would like the board to address and why? The Togiak AC has community

designated seats under 5 AAC 96.021(c) for Manokotak, Togiak and Twin Hills. Manokotak is located in Unit 17C while the other two are located in Unit 17A.

The Nushagak AC has community designated seats for Dillingham, Aleknagik, Togiak, Manokotak, Clarks Point, Koliganek, New Stuyahok, Ekwok, and Portage Creek. All but Koliganek are located in Unit 17C. Koliganek is located in Unit 17B.

In 2019, the Stony/Holitna AC was moved in regulation by the Joint Board from the Western Region ACs to the Interior Region ACs.

This proposal reflects the region change in 2019 for the Stony/Holitna AC. It also adds the Nushagak and Togiak ACs to the applicable subunits under 5 AAC 98.005 which were inadvertently excluded when the regulation was established in 2014.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-067)

Reauthorizations for Antlerless Moose Hunts and Brown Bear Tag Fee Exemptions

PROPOSAL 150

5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska as follows:

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

...

- (4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

...

What is the issue you would like the board to address and why? Brown bear tag fee exemptions must be reauthorized annually. Reauthorizing the exemption allows residents who have not purchased the \$25 brown bear tag to take bears opportunistically. This reauthorization would assist with our objective of managing Region III brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically.

Region III (Interior and Northeast Alaska) brown bear populations are healthy, and harvest is monitored through the brown bear sealing requirement. Reauthorizing all resident brown bear tag fees throughout Region III maintains simpler regulations, provides high resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization includes tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

The Department of Fish and Game estimates that brown bear harvest accounts for less than 6% of the bear population. Harvest is composed primarily of males and is sustainable. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed by adjusting seasons and bag limits. The absence of resident tag fees that were in place prior to 2010 appears to have little effect on net harvest across the region in general.

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

PROPOSED BY: Alaska Department of Fish & Game

(HQ-F24-050)

PROPOSAL 151

5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A as follows:

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

- ...
- (4) Units... 26;
- ...
- (8) Unit 22;
- (9) Unit 23;
- ...
- (13) Unit 18;
- ...

(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:

- ...
- (4) Unit 18;
- ...
- (7) Unit 22;
- (8) Unit 23;
- ...
- (10) Unit 26(A).

What is the issue you would like the board to address and why? The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. The department recommends continuing resident tag fee exemptions for the general season and subsistence season hunts in Region V (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 10 years; Unit 22, where the tag fee has been exempted for 20 years; Unit 23, where the tag fee has been exempted for 15 years; and Unit 26A, where the tag fee has been exempted for 10 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for RY2012 and harvest has remained within sustained yield and continues to be similar to the preceding ten-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in

response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements include: 1) registration permit, 2) tag fee exemption, 3) salvaging meat for human consumption, 4) no use of aircraft in Units 22, 23 and 26A, 5) no sealing requirement unless hide and skull are removed from subsistence hunt area, and 6) if sealing is required, the skin of the head and front claws must be removed and retained by ADF&G at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADF&G for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, it is estimated that zero to three bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging less than one bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest is less than five bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between zero and five bears are taken annually by subsistence hunters.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-069)

Proposal 152

5 AAC 085.045(4) Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6(C) as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 moose by drawing permit only; up to 40 permits	Sept. 1-Oct. 31 (General hunt only)	No open season.

for bulls and up to 20 permits for antlerless moose may be issued

or

1 moose by registration permit only;

Nov. 1-Dec. 31

No open season.

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the Board of Game. The department recommends reauthorizing the state antlerless hunt in Unit 6C to achieve the harvest objectives when the federal subsistence hunt is not able to achieve the desired level of harvest.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. Because the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, we have not held the antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as indented if it is needed. Continuation of the antlerless hunts may be necessary to manage population growth and keep it within the limits of what the habitat can support.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-059)

Proposal 153

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

Reauthorize the antlerless moose season in the Twenty mile/Portage/Placer hunt area in Units 7 and 14(C) as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(5)		

...

Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage

RESIDENT HUNTERS:

1 moose by drawing permit only; up to 60 permits for bulls will be issued in combination with nonresident hunts, and up to 70 permits for antlerless moose will be issued

Aug. 20—Oct. 10
(General hunt only)

...

NONRESIDENT HUNTERS:

1 bull by drawing permit only; up to 60 permits for bulls will be issued in combination with resident hunts

Aug. 20—Oct. 10

...

What is the issue you would like the board to address and why? Antlerless moose seasons must be reauthorized annually, and the Department of Fish and Game recommends reauthorizing the antlerless hunt in Units 7 and 14C. The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters and sharp reductions during severe winters. In 2009, antlerless permits were issued for the first time since 2004. The number of permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A November 2023 aerial composition count of moose in the Twentymile, Portage, and Placer river drainages found 176 moose with a bull:cow ratio of 22 bulls per 100 cows and a calf:cow ratio of 21 calves per 100 cows.

The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at an abundance level that reduces the possibility of over-browsing of winter habitat, moose-vehicle collisions, and significant mortality events during severe winters. This hunt, in previous years, has been successful in creating additional moose hunting opportunity with little or no controversy among resource users.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-070)

Proposal 154

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

Reauthorize the antlerless moose seasons in Unit 14(C) as follows:

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar. 31 (General hunt only)	Sept 1.—Mar. 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Sept. 30 (General hunt only)	Sept 1.— Sept. 30
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		
Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloading black powder rifle only; up to 50 permits		

may be issued

Unit 14(C), that portion
of the Ship Creek drainage
upstream of the Joint Base
Elmendorf-Richardson (JBER)
Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
--	---	------------------

1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
---------------------------------------	---------------------------------------	----------------

...

Remainder of Unit 14(C)

1 moose per regulatory year,
only as follows:

...

1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
--	---	----------------

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually, and the Department of Fish and Game recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population objective (1,500 moose). This population size has been demonstrated to reduce over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and significant mortality events during severe winters. These hunts have also been successful in providing additional moose hunting opportunities in the state's human population center with little or no controversy among resource users.

Moose in Unit 14C are managed intensively for a population objective of 1,500–1,800 moose and an annual harvest objective of 90–270 moose (5AAC 92.108). The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. In 2013, the department estimated that the moose population contained approximately 1,533 moose in Unit 14C based on a combination of population censuses, composition surveys and extrapolation

to areas not surveyed. A combined 2023 aerial composition count of the Joint Base Elmendorf-Richardson Management Area and the Ship Creek drainage found 222 moose with a bull:cow ratio of 30 bulls per 100 cows and a calf:cow ratio of 9 calves per 100 cows. In 2021, a survey of the same area found a total of 301 moose with ratios of 44 bulls per 100 cows and 20 calves per 100 cows, respectively. The persistent, deep snowpack during the winter of 2022 likely resulted in additional winter mortality and an increase in the late winter energetic demands on pregnant cows, potentially reducing both the bull:cow and calf:cow estimates for the population. However, harvest numbers continue to remain relatively steady, and at this population level, there have been fewer reports of human-moose conflicts and moose-vehicle collisions.

Harvesting cow moose is paramount to maintaining the population at the low end of the objective while providing harvest opportunity.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-071)

Proposal 155

5 AAC 085.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(B), Kalgin Island

1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 20	Aug. 20—Sept. 20
---	------------------	------------------

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually by the Board of Game. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective.

In response to concerns that the moose population on Kalgin Island had exceeded the island’s carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt

for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective. Antlerless hunts, such as RM572, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat at this time.

During the most recent moose survey, department staff counted 90 moose on Kalgin Island in December 2022. This count is larger than the population objective of 20–40 moose. In the last 10 years, an average of 120 permits were issued for this hunt; of which 89 permittees hunted, with an annual average harvest of 31 moose.

The any moose registration hunt is recommended to provide liberal harvest opportunity on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make over-harvest unlikely.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-060)

Proposal 156

5 AAC 85.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 15C as follows:

This proposal would reauthorize the antlerless moose hunt for the Homer bench (DM549) and the targeted hunt (AM550).

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

(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(C), that portion from the mouth of Deep Creek easterly along the south bank of Deep Creek to N 59° 55.183', W 151° 8.155'; then southeasterly in a straight line to the unnamed

creek at N 59° 54.342',
W 151° 6.459'; and easterly down
the south bank of this stream to
Caribou Lake and easterly along
the south shore to the outlet of Fox
Creek, then south along the west
bank of Fox Creek to the mouth of
Fox Creek, and along the mean
high tide line to the point of origin

RESIDENT HUNTERS:

...

1 antlerless moose by drawing
permit only; the taking of
calves, and females accompa-
nied by calves, is prohibited;
up to 100 permits may be issued in
combination with the nonresident
drawing hunt: or

Oct. 20—Nov. 20

...

1 moose by targeted permit only; Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing
permit only; the taking of
calves, and females accompa-
nied by calves, is prohibited;
up to 100 permits may be issued in
combination with the resident
drawing hunt

Oct. 20—Nov. 20

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only Oct. 15—Mar. 31

...

What is the issue you would like the board to address and why? Antlerless moose seasons must be reauthorized annually, and the Department of Fish and Game recommends reauthorization of the Homer bench hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in Unit 15C for the 2023-24 hunting season.

In February 2023, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in a population estimate of 5,162 moose (95% CI: range 3,934–6,390), of which 22% (95% CI: 17–27) were calves. This equates to a density of approximately 4.4 moose/mi² in the census area and indicates the population has continued to grow since 2010. However, the spatial distribution of moose during winter is heavily skewed away from elevations > 1000 feet in Unit 15C. The creates high variance of moose abundance in grid cells and removal of a single high density grid cell from the GSPE census reduces the population estimate to 4,486 moose (95% CI: range 3,391–3,581), of which 22% (95% CI: 14–28) were calves. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be at or above the upper end of the Intensive Management population objective. Fall composition counts in core count areas during November 2022 provided a bull ratio of 36 bulls:100 cows. Antlerless hunts, such as DM549 and AM550, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat at this time.

The lowlands in Unit 15C, south of Deep Creek and Caribou Lake, which encompasses the hunt boundary of DM549, contain high densities of moose when deep snow drives moose to lower elevations. The human population continues to grow in these areas doubling in size since the 1980's, according to U.S. Census Bureau statistics. In 2023, the hunt area was expanded to reduce hunter conflicts with private property owners. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 25 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 63 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-061)

PROPOSAL 157

5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 18 as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(16) Unit 18 Kuskokwim Area, that portion easterly of a line from the mouth of the Ishkowitz River to the closest point of Dall Lake then to east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (60 59.41' N. latitude, 162 22.14' W. longitude), continuing upriver along a line one-half mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver along the east bank of Crooked Creek to the outlet at Arhymot lake, then following the south bank of Arhymont Lake easterly to the Unit 18 border and north of and including the Eek River drainage	Sept. 1-Oct. 15	
RESIDENT HUNTERS: ...		
1 antlerless moose by drawing permit only, up to 100 permits may be issued		

...

Unit 18, that portion that drains into Kuskokwim Bay south of the Carter Bay drainage

RESIDENT HUNTERS:

...

1 moose by registration permit only; to be announced by emergency order

Dec. 1—Mar. 31
(Season to be announced)

No open season.

Remainder of Unit 18

RESIDENT HUNTERS:

3 moose; of which only 1 may be an antlered bull; a person may not take a calf or a cow accompanied by a calf; or

Aug. 1—Sept. 30

3 antlerless moose; or

Oct. 1—Nov. 30

3 moose

Dec. 1—April 30

NONRESIDENT HUNTERS:

1 antlerless moose

Dec. 1— Mar. 15

...

What is the issue you would like the board to address and why? To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually. The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014 Board of Game meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area and nonresident antlerless hunt was adopted at the January 2017 board meeting in Bethel. The Kuskokwim hunt was adopted at the January 2024 board meeting in Kotzebue. Both the Remainder and Goodnews antlerless hunts were amended at the board meeting in Nome in 2020 . The board has previously reauthorized the antlerless moose

season for resident hunts in Unit 18 remainder for regulatory year (RY) 2016 through RY2023. This proposal requests reauthorization for RY2024.

Implementation of antlerless hunts began in 2007 and has continued each year due to increased moose abundance, productivity, and population growth along the Yukon River drainage in Unit 18. Based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated at a minimum of 24,000 animals with calf:cow ratios ranging from 36:100 to 61:100, and twinning rates from 15% to 50% for all areas. Population growth and range expansion continues in this portion of Unit 18. The population is expected to continue to grow with high recruitment and adult survival.

Current year harvest data in the Remainder of Unit 18 has not been finalized; harvest is expected to be similar to the past 4 years and well below sustained yield for this robust population. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18. The nonresident antlerless moose hunt has had very low participation. Harvest has been three antlerless moose (all cows) in the past 5 years.

The moose population in the Goodnews River drainage has grown steadily in the past 15 years following a closure in 2004. The fall hunt had a quota of 10 in the first few years of the hunt and recently increased to 45. The season has not been closed by executive order in that time, and for the past few years the quota has not been met. In the seven years that the winter hunt has been held, harvest has been low (with a range of 0-6 animals). The March of 2024 survey observed 450 moose and based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Goodnews River Drainage.

In January of 2024 at the board meeting in Kotzebue, the board adopted a drawing hunt for antlerless moose on the Kuskokwim River. The first hunt is anticipated to be held in the fall of 2025. In February of 2024 the midpoint of the population estimate was 3,336 moose in Zone 1 of the Kuskokwim hunt area. In the same month, the department counted an additional 2,327 moose in a minimum count of Zone 2 of the hunt area. Following a moratorium, the Kuskokwim moose population has experienced rapid growth and range expansion and is starting to see early signs of resource limitation and high browse removal rates.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-057)

PROPOSAL 158

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

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		
...		
Unit 19(D) upstream of the Selatna River, excluding the Black River		
1 antlerless moose by drawing permit only; up to 20 permits may be issued	Sept. 1 – Sept. 30	No open season
...		
1 moose by registration permit only, a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season
...		

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually.

The moose population in Unit 19D upstream of the Selatna River recently experienced a significant decline due to an extremely difficult winter in 2022/2023. During a November 2023 survey a decline was documented from 2,471 moose (2.2 moose/mi²) to 1,591 moose (1.4 moose/mi²). Due to this decline the Department of Fish and Game closed the winter hunt in regulatory year (RY) 23 by emergency order. Proposal 66, which was passed by the Board of Game in March 2024, authorized a new draw permit hunt in the fall for antlerless moose in a portion of Unit 19D. This proposal was submitted by the McGrath Advisory Committee prior to the documented decline of moose. While the department does not intend to issue antlerless permits in RY24 we would like to keep the hunt available as a tool to provide additional opportunity when it is again warranted.

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

PROPOSAL 159

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20A as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18) Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb.	
...		
1 moose by targeted permit only; by crossbow	Season to be announced by emergency order	

shotgun, or bow and arrow only; up to 100 permits may be issued

(General hunt only)

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

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

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts are important for maintaining the moose population at levels that the habitat can support. Antlerless hunts also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest,

and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised. Subsistence hunters in the portion of Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

Reauthorizing antlerless moose hunts will allow hunting opportunity and harvest to increase and allow the Department of Fish and Game to manage the moose populations at an optimum level. The additional harvest will help meet IM harvest objectives without reducing bull-to-cow ratios. Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by maintaining moose densities at a level compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The current objective is to maintain moose numbers within the IM population objective of 10,000–15,000 moose, while monitoring indicators of moose and habitat condition for positive density-dependent responses. The Unit 20A population was estimated at between 9,240–12,800 moose (90% confidence interval) in November 2022. There is an estimated 5,040 mi² of moose habitat in Unit 20A which equates to a moose density of between 1.8 and 2.5 moose/mi². The median of this estimate falls within the IM population objective. The department will continue to monitor Unit 20A twinning rates and short yearling weights as indices for nutritional condition of the moose population. The department has seen a slow and steady increase in both twinning rates (16%) and short yearling weights (400lbs) and are nearing the thresholds of 20% twinning rates and 400lb short yearling weights. This indicates that the nutritional condition of these moose is improving. However, the department does not want the population to further increase until we reach the thresholds of both 20% twinning rate and 400lb short yearlings. As the department continues to monitor Unit 20A twinning rates and short yearling weights, it may recommend fewer antlerless hunts in the future if these two thresholds are surpassed. The Unit 20A population is currently at the low end of the IM population objective and recovering from the difficult winter of 2021/2022. The department wants to survey the Unit 20A population in November of 2024 and evaluate the population and how it is recovering after the difficult winter. No antlerless hunts have been conducted since that winter and a cautious approach on when antlerless harvest is again appropriate is being taken. If the department detects the population is again growing in Unit 20A and is within IM population objectives then a modest harvest rate may be available for hunters. A harvest rate of 1% of the population has been shown to stabilize the moose population at its current level. Antlerless harvest would be by drawing permits for a majority of Unit 20A and a registration permit outside the Fairbanks non-subsistence area in northwest Unit 20A near Nenana. The harvest objective will be based on the most recent survey results. The antlerless harvest will target the highest density portions of Unit 20A. The Department did not issue antlerless moose permits in 2022 because of a severe 2021/2022 winter

and the anticipated high mortality, or in 2023 and 2024 because a population estimate was not completed until after the drawing permit application period. The next possible time to hunt antlerless moose would be in the fall of 2026.

The number of moose in Unit 20A was estimated at 17,768 (3.5 moose/mi²) in 2003. Research indicated this high-density moose population was experiencing density-dependent effects, including low productivity, relatively light calf weights, and high removal rates of winter forage. The objective beginning in regulatory year 2004–2005 (RY04) was to reduce moose numbers to the population objective of 10,000–12,000 moose (1.5–1.8 moose/mi²) unless indicators of moose condition showed signs of improvement at higher densities. In 2016, the Board of Game adopted the IM population objective of 10,000–15,000 moose and the 2022 population estimate is within the IM objective.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-051)

PROPOSAL 160

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20B as follows:

Units and Bag Limits (18)	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
...		
Unit 20(B), that portion within Creamer’s refuge		
...		

Units and Bag Limits

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

1 antlerless moose by muzzle-loader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area

Unit 20(B), remainder of the Fairbanks Management Area

...

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

1 moose by targeted permit only; up to 100 permits may be issued

Unit 20(B), that portion within the Minto Flats Management Area

RESIDENT HUNTERS:

...

**Resident
Open Season
Subsistence and
General Hunts**
Sept. 1–Nov. 27
(General hunt only)

Dec. 1–Jan. 31

Sept. 1–Nov. 27
(General hunt only)

Season to be announced
by emergency order

**Nonresident
Open Season**
Sept. 1–Nov. 27
(DM786 only)

No Open Season

Sept. 1–Nov. 27
(DM786 only)

No open season.

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
1 antlerless moose by registration permit only	Oct. 15–Feb. 28 (Subsistence hunt only)	No open season.
...		
Unit 20(B), the drainage of the Middle Fork of the Chena River		
1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb. (General hunt only)	No open season.
...		
Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway		
...		
1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Last day of Feb. (General hunt only)	No open season.
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
Remainder of Unit 20(B)		
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14 (General hunt only)	No open season

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	No open season.
...		

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population may exceed population objectives causing habitat degradation and a loss of opportunity to hunt a surplus of antlerless moose. The reauthorization of antlerless moose hunts in Unit 20B will allow Alaska Department of Fish and Game (ADF&G) to manage the moose population within the population objectives of 12,000 to 15,000 moose. Hunting opportunity and harvest will increase and allow ADF&G to manage this moose population at optimum levels. The additional harvest is necessary to meet intensive management harvest objectives while maintaining bull-to-cow ratios within objectives. Moose populations will benefit by maintaining moose densities at levels compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

The moose population level in Unit 20B is currently below the population objective of 12,000–15,000 moose. The population declined from an estimated 20,173 moose in 2009 to 11,064 in 2015, due in large part to antlerless moose hunts designed to lower the population to those objectives. The population increased slightly to 12,871 moose in 2017 and was estimated at

12,479 in 2020. A population estimate was conducted in the fall of 2023. It was the first survey completed since the winter of 2021/2022 which was a difficult winter for moose due to weather events. The 2023 Unit 20B moose population estimate was 7,848 moose. The department feels that at this time antlerless hunts should be limited until the population recovers and is within IM objectives. The department recommends limited antlerless hunts in the Fairbanks Management Area (FMA) and the Richardson Highway corridor hunt. The department will continue to monitor the moose population and may implement additional antlerless hunts in the future if the population can sustain the harvest.

Fairbanks Management Area (FMA)—The purpose of this antlerless hunt is to regulate population growth in the FMA and reduce potential moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest, and reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during RY99–RY10. Moose–vehicle collisions and moose nuisance problems have remained lower since this time, presumably, in part due to consistent antlerless moose harvests.

Richardson Highway Corridor Hunt- This hunt is an “any” moose drawing permit that allows hunters to hunt within ½ mile of each side of the Richardson Highway. The purpose of this hunt is to allow hunters to harvest moose along the Richardson Highway to help reduce moose-vehicle collisions.

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

PROPOSED BY: Alaska Department of Fish and Game. (HQ-F24-052)

PROPOSAL 161

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

(18) hunting seasons and bag limits for moose in Unit 20 are as follows:

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

Unit 20(D), that portion lying

west of the west bank of the Johnson River and south of the north bank of the Tanana River, except the Delta Junction Management Area and the Bison Range Controlled Use Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued in combination with those portion in the Delta Junction Management Area and the Bison Range Controlled Use Area; a person may not take a calf or a cow accompanied by a calf;

Sept. 16 – Sept. 25
(General hunt only)

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

Oct. 10 - Nov. 25
(General hunt only)

...

Unit 20(D), that portion within the Bison Range Controlled Use Area

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued in Unit 20(D) lying west of the west bank of the Johnson River and south of the north bank of the Tanana River and the Delta Junction Management Area; a person may

Sept. 16 – Sept. 25
(General hunt only)

not take a calf or a cow accompanied by a calf;

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued Unit 20(D) lying west of the west bank of the Johnson River and south of the north bank of the Tanana River and the Bison Range Controlled Use Area; a person may not take a calf or a cow accompanied by a calf;

Sept. 16 – Sept. 25
(General hunt only)

1 moose every four regulatory years by drawing permit a person may not take a calf or a cow accompanied by a calf; or

Sept. 1 - Sept. 15
(General hunt only)

...

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

Oct. 10 - Nov. 25
(General hunt only)

NONRESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1 - Sept. 15

...

What is the issue you would like the board to address and why? Antlerless moose hunts must be reauthorized annually. The objectives of the Unit 20D antlerless moose hunts are to 1) stabilize population growth of this high-density moose population; 2) address concerns about range degradation, reduced nutritional condition of moose, and reduced reproductive success of moose; 3) make progress toward meeting the Unit 20D intensive management (IM) harvest objective of 500–700 moose; and 4) provide youth and disabled veteran hunting opportunity. These objectives are being met.

If antlerless moose hunts are not reauthorized, the moose population could quickly increase to levels beyond the ability of the habitat to support the moose population. Allowing the population to grow beyond what the habitat can support may require the population to be reduced dramatically to avoid long term habitat damage. Opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be compromised.

Antlerless moose hunts are offered in southwest Unit 20D, which has the highest moose density in the unit. This area has great potential for population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 40 years. Total moose harvest in all of Unit 20D averaged 146 bull moose during regulatory years 2020 and 2021. No antlerless moose were harvested in regulatory year (RY) 22 or RY23 as the moose population experienced a 40% decline as a result of the severe winter of 2021 – 2022. However, the population has begun to rebound, and a very small antlerless hunt is planned for RY24 with less than 20 tags issued.

Antlerless hunting opportunity and harvest is limited at present to help maintain this moose population at current densities and within habitat carrying capacity. The largest antlerless harvest (n=510) occurred in Unit 20D in 2007, when antlerless hunts were first authorized to reduce population size and address moose nutritional concerns. Since 2011, the southwest Unit 20D population estimates (range = 2,500–4,500 moose) and bull harvest in southwestern Unit 20D (201–282) have been stable. The 2022 population estimate for southwest Unit 20D was 2,459 moose (corrected for sightability) with a density of 1.94 moose per square mile, 28 calves:100 cows and 23 bulls:100 cows. The 2022 population estimate is 40% lower than the 2020 estimate, likely due to increased mortality as a result of severe winter conditions during 2021–2022, which included deep snow and winter rain events. The Department of Fish and Game does expect nutritional indices to improve because of fewer moose on the landscape relative to habitat capacity. This process is already evident as the 2023 population estimate of 3,555 moose was an increase compared to 2,459 moose in 2022. In order to prevent the moose population from experiencing nutritional stress in future years, a few antlerless permits will be warranted annually going forward.

Continued antlerless harvest will likely be needed to maintain this population at the optimal density relative to habitat constraints and will contribute additional harvest toward meeting the IM harvest objective of 500–700 moose without reducing bull-to-cow ratios below management objectives. The current population trend suggests that low, consistent antlerless harvest provided by drawing permit hunts in Unit 20D, in conjunction with other mortality factors (including ceremonial harvest, vehicle collision, accidents, and predation), is appropriate to maintain population stability.

The department will continue to evaluate antlerless moose hunts and their effect on moose density and population growth. Future antlerless moose hunts will be implemented as needed based on the evaluation of the following three indices of density-dependent moose nutritional conditions in relation to changes in moose density: biomass removal of current annual growth on winter browse, proportion of females with twin calves, and late-winter calf weights.

Additional drawing or registration permits will be issued only if more harvest is needed in specific areas to maintain optimal moose densities.

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

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-053)

PROPOSAL 162

5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20E as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
...		
Unit 20(E), remaining portion of the Ladue River Controlled Use Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or	Aug. 5–Sept. 5 Oct. 15–Nov. 30	

1 antlerless moose by drawing permit only; up to 400 permits may be issued; a person may not take a cow accompanied by a calf

Oct. 15–Nov. 30

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf

Aug. 5–Sept. 5

Oct. 15–Nov. 30

Unit 20(E), that portion outside of the Ladue River Controlled Use draining into 1) the Ladue River upstream of the South Fork of the Ladue River, 2) the Dennison Fork of the Fortymile River, and 3) the Mosquito Fork of the Fortymile River drainage.

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; by youth hunt only; up to 100 permits may be issued in combination with the nonresident drawing hunt; a person may not take a cow accompanied by a calf; or

Aug. 5–Sept. 5

Oct. 15–Nov. 30

1 antlerless moose by drawing permit only; up

Oct. 15–Nov. 30

to 400 permits may be issued;
a person may not take a cow
accompanied by a calf

NONRESIDENT HUNTERS:

...

1 antlerless moose by
drawing permit only; by youth
hunt only; up to 100 permits
may be issued in combination
with the nonresident drawing
hunt; a person may
not take a cow accompanied
by a calf

Aug. 5–Sept. 5
Oct. 15–Nov. 30

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The Unit 20E antlerless moose hunts were originally adopted by the Board of Game in March 2022 as a proactive management tool with the primary goals to 1) slow population growth to avoid habitat damage, 2) help achieve intensive management (IM) harvest objectives, and 3) provide the management flexibility to rapidly respond to changes in nutrition.

Current Unit 20E moose harvest is below IM harvest objectives; therefore, antlerless harvest, if enacted, would help achieve IM harvest objectives without reducing bull:cow ratios below management objectives. The Unit 20E IM harvest objective is 250–450 moose, and the RY19–RY23 annual average unit wide reported harvest was 191 moose.

The decision framework to initiate antlerless harvest in Unit 20E includes population trend, bull:cow ratios, and nutritional indices. The moose population within a 1,821 mi² area along the Taylor Highway in southern Unit 20E approximately doubled from 0.7 moose/mi² in 2005 to 1.4 moose/mi² in 2018, but declined to 0.9 moose/mi² by 2023 following several severe winters. Bull:cow ratio estimates in southern Unit 20E are currently stable and above the minimum management objectives. Finally, nutritional indices show that the moose population is currently at healthy nutritional levels. Twinning rates are healthy at 34% (2021–2023, 3-year weighted average). The department closely monitors these rates given the potential for them to lag as an indicator of population-level nutritional condition. Additionally, the estimated browse removal rate in spring 2022 was 28%, which is below the rate observed in nutritionally stressed populations.

Given the current stable population trend and bull:cow ratios and healthy nutritional indices, the department does not plan to enact antlerless hunts during regulatory year (RY) 25 but would like to retain the hunts as a proactive management tool. The Unit 20E antlerless harvest framework

provides management flexibility to rapidly respond to potential future changes in nutrition and the ability to proactively reduce population growth rates, if necessary, to maintain the current high nutritional levels.

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

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-054)

PROPOSAL 163

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

Reauthorize a winter any-moose season during March in a portion of Unit 21D as follows:

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

(B) on or after July 1, 2018, the hunting seasons and bag limits for moose in Unit 21 are as follows:

...

Unit 21(D), that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek

RESIDENT HUNTERS:

...

1 moose, by registration permit only, up to 15 days during March; a person may not take a cow accompanied by a calf

(Winter season to be announced)

...

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose recently emerged because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. This reauthorization will likely improve or maintain hunting opportunity. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost, and the ability to meet intensive management (IM) harvest objectives could be reduced. In addition, rather than allow the population to go through dramatic rates of expansion and contraction, it is necessary to slow the rate of increase.

The IM harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2014–2023 was 391 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not met the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. Subsistence hunters will benefit from the opportunity to harvest cow moose.

Analysis of three Trend Count Areas (TCAs) (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough TCAs) within the Kaiyuh Flats in this hunt area demonstrated an increase in moose abundance among all age classes from 2001 to present. Geospatial population estimate data also increased from 1,897 ($\pm 11\%$) moose in 2011 to 4,116 ($\pm 10\%$) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates 2004-2023 (avg. = 35.4%), although the most recent 5-year twinning rate average (2019-2023) was 26.0%.

The portion of Unit 21D affected by this reauthorization is approximately 21% (2,559 mi²) of the u (12,093.6 mi²). Moose abundance in this area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the total moose in Unit 21D; estimated at 10,478 moose ($\pm 1,572$) in 2023. The total Unit 21D moose population estimate was above the IM population objective of 9,000–10,000 moose for all of Unit 21D (12,093.6 mi²).

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

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-056)

PROPOSAL 164

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

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
...		
Unit 21(E)		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, a person may not take a cow accompanied by a calf	Feb 15 – Mar 15	
...		

What is the issue you would like the board to address and why? Antlerless moose hunting seasons must be reauthorized annually. The goal is to provide additional harvest opportunity and meet harvest objectives.

The most current survey in 2022 indicated there are approximately 9,300 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000–11,000 moose. There is currently a harvestable surplus of 390 moose, however many of those moose are not accessible in the fall. Approximately 200 moose are harvested each fall along the rivers. Bull-to-cow ratios are high, with 46 bulls per 100 cows in 2022. The IM harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 1.9 moose/mi² in 2022. The two-year average twinning rate in the Holy Cross area is 26%, while north of Anvik and Shageluk (where the moose density is lower) the twinning rate is 56%.

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

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

PROPOSED BY: Alaska Department of Fish & Game (HQ-F24-055)

PROPOSAL 165

5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 26 as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(24)		
...		
Unit 26(A), that portion west of the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155 00 longitude excluding the Colville River drainage	July 1 - Sept. 14	No open season.
1 moose		

What is the issue you would like the board to address and why? To be retained, the antlerless moose season in the portion of Unit 26A west of 156° 00' W longitude and excluding the Colville drainage must be reauthorized annually. This hunt was recently created by the board at the 2024 meeting in Kotzebue after being closed for the previous year due to not being reauthorized in 2023.

The moose population in the western portion of Unit 26A north of the Colville drainage is somewhat unique compared to the unit-wide population, and the distribution is very sparse because there is very little moose habitat in the coastal plain. However, each year a small number of bulls and cows migrate into the area from the major river drainages in the central and southern parts of the unit. So far, the marginal habitat in this portion of Unit 26A has not allowed moose to establish a population, but these moose provide the only opportunity to harvest a moose in the northwestern portion of Unit 26A.

Unit 26A moose population estimates have historically fluctuated between 294 and 609 moose between 2011 and 2014. More recently, 348 moose and 438 moose were observed in 2018 and

2021, respectively. The overall trend appears to be slow growth after a decline that started about 2007. The number of moose in the antlerless hunt area is difficult to estimate, but is approximately 10 moose. Harvest reports indicate 4 antlerless moose have been harvested since 2005, and the annual harvest rate of antlerless moose is less than 1% of the total population. Due to the low harvest rate, the department proposes reauthorization of the antlerless moose season in this area to provide additional hunting opportunity for the small number of hunters to opportunistically harvest antlerless moose in this remote portion of Unit 26A.

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

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-058)
