ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS FOR PROPOSALS

STATEWIDE REGULATIONS PROPOSALS

ALASKA BOARD OF GAME MEETING

ANCHORAGE, ALASKA

MARCH 21-28, 2025

The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 21-28, 2025 in Anchorage, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

PROPOSAL 85 – 5 AAC 92.013. Migratory bird hunting guide services. Change the definition for migratory bird hunting guide services to include transporter services.

PROPOSED BY: Nancy Hillstand

WHAT WOULD THE PROPOSAL DO? The proposal seeks to redefine migratory bird hunting guide services to include affiliated transportation services provided to migratory bird hunters.

WHAT ARE THE CURRENT REGULATIONS? The current regulation defines a migratory bird guide as 'a person (includes a business entity) who provides migratory bird hunting guide services. Migratory bird hunting guide services is defined as 'a means to assist for compensation or with the intent to receive compensation, a migratory bird hunter to take or attempt to take migratory birds by accompanying or personally directing the hunter in migratory bird hunting activities.'

5 AAC 92.013. Migratory bird hunting guide services.

(a) A migratory bird hunting guide shall register each year with the department before providing migratory bird hunting guide services by submitting to the department a completed migratory bird hunting guide registration form provided by the department that includes at least the following information at the time of registration:

(1) the name…address…phone number of the migratory bird hunting guide;
(2) the areas in which the migratory bird hunting guide will operate; and
(3) the name…of any business that employs the migratory bird hunting guide

(b) A person engaged in providing migratory bird hunting services must have in possession a copy of a validated migratory bird guide hunting registration form for the current year.

(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, for compensation or with the intent to receive compensation, a migratory bird hunter to take or attempt to take migratory birds by accompanying or personally directing the hunter in migratory bird hunting activities
(3) "person" includes a business entity.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Affiliated services such as water and air taxis, fishing/hunting charters, outfitters, and lodges providing support (other than direct guiding services) to migratory bird hunters would be required to register with the department annually and carry a validated copy of the registration form (guide card) when providing these services.

BACKGROUND: In 2002, the Board of Game (board) adopted a department proposal to establish a new regulation that required migratory game bird guides to register annually with the department, provide basic contact information, and carry proof of registration. The purpose of requiring guides to register was to fill an information gap on the identity, location, and level of activity of commercial migratory game bird guides (as defined in the regulation), thus providing the department a means of tracking guides operating in Alaska. The regulation allowed the prospect of monitoring trends in regional guide activity and connecting with guides and their clients for activities such as biological data collection, promoting management objectives, and communicating regulatory changes.

Alaska statute (AS 08.54.790(12)) defines transportation services (i.e., transporters) "as the carriage for compensation of big game hunters, their equipment, or big game animals harvested by hunters to, from, or in the field." The definition excludes "nonstop flights between airports listed in the Alaska supplement to the Airmen's Guide or by an air taxi operator or air carrier where transportation services are only an 'incidental' portion of its business" – 'incidental' means "does not charge more than the usual tariff or charter rate or advertise transportation services to the public" (i.e., solicit big game hunters to be customers for purposes of big game hunting). Transporters may rely on their experience to advise on hunt areas meant to increase hunter success but may not "knowingly accompany or remain in the field with a big game hunter who is a client of the transporter." Big game transporters are required to be licensed by the state Department of Commerce, Community, and Economic Development.

The migratory game bird guide registration is comparable to that of the Sport Fish Division where individuals or entities guiding sport anglers (including their guide vessels) for compensation are required to register with the department on an annual basis. Sport fishing guide services are defined as "accompanying or physically directing the sport angler in sport fishing activities during any part of a sport fishing trip." Affiliated services like air taxis, water taxis or lodges are not required to register with the department if only providing transport services (e.g., fishing hole drop-off and pick-up) to anglers, as it is recognized that these services are not accompanying or directing anglers in sport fishing activities. However, "if an individual is compensated and provides any instructions to clients on where to fish, what to use, or provides detailed instructions that would improve the client's success, that individual would be considered a guide."

The department defines migratory bird hunting guide services similarly and recognizes that appropriate tracking and information exchange with guides and their clients may have benefit in management of Alaska's migratory game bird resources. Registering affiliated transportation services that have a transient relationship with bird hunters and indirect links with the migratory game bird resource would provide no similar benefit, rather would add undue regulatory burden to these services.

DEPARTMENT COMMENTS: The department is **OPPOSES** this proposal because there are no biological concerns regarding migratory game birds. However, the department perceives no benefit to migratory game bird management that would reasonably justify annual tracking of transportation services supporting migratory game bird hunters in Alaska.

COST ANALYSIS: Adoption of this proposal would result in additional costs to the department to modify the online registration system for expanded entries and communicate the registration requirement to the affiliated services sector.

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PROPOSAL 86 – 5 AAC 92.010. Harvest tickets and reports. Require mandatory harvest reporting of sea ducks.

PROPOSED BY: Penelope Haas

WHAT WOULD THE PROPOSAL DO? The proposal would require hunters to report their harvest of sea ducks in Alaska.

WHAT ARE THE CURRENT REGULATIONS? There are no current regulations that require the department to record hunter harvest of sea ducks in Alaska. However, current regulation (*see below*) requires all hunters that possess an Alaska waterfowl conservation tag (state duck stamp) to register with the Migratory Bird Harvest Information Program (HIP) as part of the National Migratory Bird Harvest Survey (diary survey) conducted by the U.S. Fish and Wildlife Service; registration in HIP is mandatory but participation in the diary survey is voluntary and includes sea ducks.

5 AAC 92.018. Waterfowl conservation tag. A person required to possess an Alaska waterfowl conservation tag or "stamp" under AS 16.05.340(a)(17) shall

(1) register in the Migratory Bird Harvest Information Program and carry proof of that registration while hunting migratory birds; and…

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department would be required to develop, administer, and communicate a system that required hunters to report their sea duck harvest in Alaska.

BACKGROUND: Harvest monitoring can be an important component in the management of migratory game birds; however, harvest data alone are generally not a sufficient source of information for guiding management decisions. Methods for monitoring annual harvest have varied and shifted since the 1950s, including early templates by the U.S. Fish and Wildlife Service (Service) and many state sponsored harvest surveys.

The department conducted a survey of waterfowl harvest in Alaska from 1971–1997, primarily via a voluntary mail-in questionnaire provided to hunters that purchased the state duck stamp. The survey was designed to estimate hunter activity and harvest of ducks (dabbling and diving), sea ducks, geese, cranes, and snipe in 12 geographic regions across the state. Hunters were not asked to speciate their duck or sea duck harvest to avoid potential inaccuracies due to misidentification. The department discontinued the statewide harvest survey in 1998 when the Service fully implemented an annual national harvest survey in partnership with state wildlife agencies across the U.S.

The national harvest survey was developed to assess continental harvest of migratory game birds in recognition of long-standing problems with traditional state and federal surveys including: inadequate sampling of migratory bird hunters, lack of information on non-waterfowl (e.g., snipe, sandhill cranes, doves) and less frequently hunted species (e.g., sea ducks, brant), and inconsistent survey methods among states that prevented comprehensive flyway and national harvest estimates.

The national survey monitors annual harvest of migratory game birds and hunter activity in the U.S. by implementing three components: the HIP program, the diary survey, and the Parts Collection Survey (PCS). The HIP program requires licensed migratory game bird hunters annually register with the program in each state they hunt (in Alaska, hunters register for HIP with purchase of the state duck stamp). State agencies collect personal information and the previous year's hunting activity from registered hunters on behalf of the Service. The Service then uses this list to draw and stratify a statistical sample of hunters for a voluntary harvest diary survey designed to record their hunting activity during the current year to estimate harvest of waterfowl (ducks, sea ducks, geese, brant); doves and pigeons; woodcock; snipe, rails, gallinules, coots; and sandhill cranes. The third component, the PCS, is conducted annually and used to estimate species, age, and sex composition of the migratory bird harvest. To participate, hunters voluntarily collect and send in either wings (ducks, brant, coots) or tail feathers (geese) from birds shot throughout a hunting season. At season's end, the biologists from the Service and state wildlife agencies examine all submitted parts to determine species, age, and sex composition of the harvest. Species composition estimates derived from the PCS are combined with harvest estimates from the diary survey to estimate annual species-specific duck and goose harvest for each state, flyway, and nationwide.

In contrast to the random sampling design of the diary survey, this proposal seemingly seeks to apply a registration hunt with mandatory harvest reporting to independently assess statewide sea duck harvest in Alaska to ensure "accurate harvest numbers". A registration hunt could perhaps achieve reasonable precision for harvest estimates of sea ducks as a group but like the broader-scale HIP methodology, a statewide harvest survey would need to be paired with a system of validation (i.e., a PCS) to account for misidentification bias to estimate species-specific harvest. However, a voluntary PCS would be costly and labor-intensive to implement and structuring such a survey coincident with a registration hunt would be challenging and perhaps biased by

nonrandom sampling. For example, many hunters may not voluntarily submit wings from birds planned for taxidermy (e.g., males in breeding plumage), resulting in harvest estimates that are biased toward females and juveniles.

Importantly, harvest data best informs regulatory decisions when considered in the context of species-specific population assessments. Most waterfowl populations are assessed via aerial surveys during the breeding period when conditions are favorable for conducting aerial surveys, and birds are largely concentrated on the landscape. However, the biology of sea ducks often complicates these efforts, and existing surveys are not ideally suited for monitoring sea ducks, particularly in Alaska. Breeding waterfowl surveys tend to be incomplete assessments of sea ducks due in part to availability bias, low detection, and incomplete species identification. Specifically, substantial population segments of sea ducks breed in subarctic and arctic regions of Canada and Russia that are not well surveyed; sea duck breeding chronology often lags optimal survey timing because sea ducks breed later than other duck species for which these breeding surveys were designed (e.g., mallards); and some sea duck species are counted as groups (e.g., scoters and mergansers) due to imprecise speciation during aerial surveys. In Alaska, the population status and trends of many sea duck species are derived from three larger scale aerial breeding bird surveys: the Alaska-Yukon portion of the continent-wide Waterfowl Breeding Population and Habitat Survey (BPOP) and regional-scale Yukon-Kuskokwim Delta and Arctic Coastal Plain surveys. However, for reasons stated above, these surveys offer only partial assessments of sea duck populations in Alaska. Surveys during the non-breeding period (e.g., winter) may provide a more complete assessment of harvestable sea duck populations in the state but are less feasible because sea ducks tend to be distributed across vast geographic expanses of coastline in remote marine habitats that are not easily accessible nor logistically practical or safe to survey.

Unfortunately, partial population assessments of sea ducks in Alaska would hamper understanding of the relationship between harvest and population dynamics even if robust and precise harvest estimates existed. Implementing a redundant and expensive statewide harvest survey of sea ducks may serve only to burden department resources without fostering informed sea duck management.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The department notes that current statewide species-specific harvest estimates for sea ducks are provided to the department through the national harvest survey conducted annually by the Service. A secondary system administered by the department would be redundant and unlikely to produce more robust harvest estimates for individual sea duck species at the statewide level without allocating substantial time and financial resources.

Further, since the department does not have comprehensive population status and trend information for sea duck species at a corresponding statewide scale, there is no context for the harvest data, as such, these data would provide limited utility for harvest management. The department cautions that without an independent assessment of species composition (e.g., a statewide PCS), a harvest survey is susceptible to inaccuracies from species misidentification by

hunters and likely only meaningful at the resolution of the 'sea duck' group. However, a statewide PCS would be costly, staff- and time-intensive to implement, and may be difficult to structure without sample bias.

COST ANALYSIS: Adoption of this proposal would result in additional costs to the department for the development, administration, and communication of a harvest reporting system for sea duck hunters and an associated statewide PCS to validate harvest reports.

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PROPOSAL 87 – 5 AAC 92.100. Unlawful methods of hunting waterfowl, snipe, and cranes. Restrict the use of boats for hunting waterfowl.

PROPOSED BY: Nancy Hillstrang

WHAT WOULD THE PROPOSAL DO? The proposal seeks to further restrict the use of boats during hunting of waterfowl, snipe, and cranes by requiring any boat to become stationary by being anchored or beached within 100 yards of anyone discharging firearms.

WHAT ARE THE CURRENT REGULATIONS? Current federal and state regulations prohibit hunting migratory birds from or by means of any motorboat or sailboat unless the motor has been shutoff or sails furled, and vessel forward progress has ceased. However, crafts under power may be used to retrieve dead or crippled birds, but crippled birds may not be shot from such craft under power. In addition, motor driven vessels or sailboats may not be used to concentrate, drive, rally, or stir up any migratory bird.

50 CFR § 20.21 What hunting methods are illegal?

(d) From or by means, aid, or use of any motor vehicle, motor-driven land conveyance, or aircraft of any kind, except that paraplegics and persons missing one or both legs may take from any stationary motor vehicle or stationary motor-driven land conveyance;

(e) From or by means of any motorboat or other craft having a motor attached, or any sailboat, unless the motor has been completely shut off and/or the sails furled, and its progress therefrom has ceased: *Provided,* that a craft under power may be used to retrieve dead or crippled birds; however, crippled birds may not be shot from such craft under power…;

(h) By means or aid of any motor-driven land, water, or air conveyance, or any sailboat used for the purpose of or resulting in the concentrating, driving, rallying, or stirring up of any migratory bird;

50 CFR § 20.21 Wanton waste of migratory game birds.

No person shall kill or cripple any migratory game bird pursuant to this part without making a reasonable effort to retrieve the bird, and retain it in his actual custody, at the place where taken or between that place and…

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

(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 as a means of retrieving a dead or injured bird;

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

(5) except as otherwise specified, with the use of a motorized vehicle to harass game or for the purpose of driving, herding, or molesting game;

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department interprets the intent of the proposal to mean, that if adopted, all boats (including those not affiliated with a hunting party) must remain stationary throughout the duration of a hunt by either being beached or anchored within 100 yards of anyone discharging a firearm.

BACKGROUND: Current federal and state regulations prohibit the use of boats to hunt, herd, or rally waterfowl to prevent unfair hunter advantage in the pursuit of migratory game birds. However, the regulations do allow the opportunity for hunters to retrieve crippled or dead birds using boats. The proposed amendment to 5 AAC 92.100 halts all boat travel during a hunt within 100 yards of anyone discharging a firearm. There are two potential complications if this regulation change is adopted: 1. the amended regulation would require boat operators unaffiliated with hunters (e.g., recreational boaters) to identify hunting parties, which are often concealed, in advance and likely reroute travel; and 2. if hunters rely on boats to retrieve downed birds, which is common, the amended regulation will require them to suspend retrieval until the hunt is terminated. This risks loss of killed or crippled birds which would violate hunter ethics and potentially federal wanton waste regulations (50 CFR § 20.25).

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal and there are no perceived associated biological concerns. Also, the department notes that current federal and state regulations are adequate to prohibit the use of boats by migratory bird hunters to prevent unfair advantage or waterfowl harassment. The department is also concerned that the proposed change could unintentionally put hunters and boat operators at risk of violating regulations. The use of boats to rally or herd birds in violation of current regulations is likely best addressed through enforcement.

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

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PROPOSAL 88 – 5 AAC 92.034. Permit to take and use game for cultural purposes. Add Wood bison to the species that may be taken for cultural purposes.

PROPOSED BY: Minto-Nenana Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The proposal would add Wood bison to the list of game that can be taken by permit and used within this state for the teaching and preservation of historic or traditional Alaskan cultural practices, knowledge, and values.

WHAT ARE THE CURRENT REGULATIONS?

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

Wood bison are a newly reintroduced species to Alaska; the board has not made a customary and traditional use determination for the species, nor are there existing seasons or bag limits for them. All hunting, both state and federal, is currently closed as the herds are establishing their home ranges and growing to eventually allow harvest.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted interested persons or organizations would be able to apply for a permit to take Wood bison for cultural purposes.

BACKGROUND: The goal of the Wood Bison Project is to restore viable, free-ranging wood bison populations to portions of their former range in Alaska, which can contribute to the ecological, cultural, economic and social well-being of people and communities across the state. Wood bison are descendants of the large-horned bison of the Pelistocene epoch. Skeletal remains and historical accounts show that wood bison were once widely distributed in Interior Alaska and were likely present for most of the last 10,000 years. All wood bison released in 2015 and 2022 came from or are the decedents of bison from Elk Island National Park in Canada which is the source population of all newly established wood bison herds in the last 50 years. The department has an agreement with Parks Canada to obtain surplus wood bison through at least 2028. The

department has worked extensively with communities and interest groups to determine where wood bison restoration efforts will focus next.

According to Alaska Native oral history, the last wood bison in Alaska were shot around 1918 along the Yukon river between Tanana and Fort Yukon. The department has led an effort to restore wood bison to portions of their former range for the last 30 years. There is currently one wild wood bison population in Alaska and there is expected to be two wild populations by May of 2025.

This proposal would allow cultural and educational permits to be issued by the department for wood bison. For example, groups could apply to the department to take several people out and harvest a wood bison as long as it is used as an opportunity to teach. Curriculum could include hunting strategy, butchering techniques, preparation and preservation of the bounty, how to treat the animal with respect, etc. The number of cultural and educational permits that are issued depends on harvestable surplus available and the department's discretion. In the case of wood bison, the department could issue these permits with guidance and input from the site-specific wood bison public planning team (made up of 30+ interest groups including the proposal authors and local AC's). The Lower Tanana Wood Bison Planning Team has discussed the limited use of this type of permit

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

Because of the 10(j) rule for Alaska wood bison, wood bison can be harvested through sustainable hunting practices. Since the state has been designated as the lead for managing wood bison harvest, wood bison will be harvested under the legal boundaries of the state regulations. A side note is that ANILCA, which gives the FSB its authority, specifically does not apply to ESA listed species, so technically the FSB cannot make regulations governing the harvest of wood bison while they are listed.

This proposal would allow cultural and educational permits to be issued by the department for wood bison. For example, groups could apply to the department to take several people out and harvest a wood bison as long as it is used as an opportunity to teach. Curriculum could include hunting strategy, butchering techniques, preparation and preservation of the bounty, how to treat the animal with respect, etc. The number of cultural and educational permits that are issued depends on harvestable surplus available and the department's discretion. In the case of wood bison, the Department could issue these permits with guidance and input from the site-specific wood bison public planning team (made up of 30+ interest groups including the proposal authors and local AC's). The Lower Tanana Wood Bison Planning Team has discussed the limited use of this type of permit.

If adopted this proposal, it might open the door for people of all walks of life (rural and urban) to have something like a single shared hunt where a group of hunters went out and harvested a single bison together and many people learned about how to cut it up and prepare it, and many people could be involved in a large event to consume the bison. This could go a long way in bringing conflicting groups together. The main opposition to wood bison restoration stems from

the inherent conflicts between different groups of humans associated with allocation of this public trust resource.

There is currently no harvestable surplus for Wood bison in either the Innoko or Minto herds. A primary goal of restoring Wood bison in Alaska is to provide the opportunity for harvest. But it will be many years before this regulation will be up for proposals again. If wood bison populations grow in either herd, and this regulation is available, it may be a tool that could be used to harvest a very small number of bison.

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

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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.

PROPOSED BY: Janessa Newman and Charlie Wright

WHAT WOULD THE PROPOSAL DO? Require nonresident moose hunters to attend a department-approved hunter education certification course and be accompanied by a registered guide or resident family member within the second degree of kindred.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.003. Hunter education and orientation requirements.

(a) Except for a beneficiary of a proxy hunter, 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;

(2) not required to have a hunting license, and who has not successfully completed a certified hunter education course, must, in order to hunt in Units 7, 13, 14, 15, and 20, be under the direct immediate supervision of a licensed hunter who

(A) is 18 years of age or older and has successfully completed a certified hunter education course; or

(B) was born on or before January 1, 1986.

...

(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.

...

(m) A person must have successfully completed a department-approved hunter orientation course, to include antler recognition, prior to hunting moose in Units 7 and 15.

(n) A nonresident hunter in Units 21(A) and 21(E) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting moose or must be accompanied by a registered guide.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would require all nonresident moose hunters to successfully complete a department-approved hunter orientation course prior to hunting and be accompanied by a registered guide or resident relative within second-degree of kindred.

BACKGROUND: Currently, all hunters born after January 1, 1986 in units 7, 13, 14, 15, and 20 must have completed a department-approved hunter education certification course. Hunters who were born before this date do not have a requirement for hunter education. Therefore, older nonresident moose hunters may not have completed a hunter education course which includes meat care and wildlife identification. In addition, a nonresident moose hunter may be accompanied by a family member who also has not completed a hunter education certification course because they are not required to based on age.

There is strong evidence that hunter education has been successful in Alaska and other states at reducing firearm incidents, wounding loss, and hunting violations. Every state offers a hunter education certification course which follows educational standards administered by the International Hunter Education Association (IHEA-USA) and provides training in firearms safety, wildlife conservation, and respect for our natural resources, landowners, and other hunters. The Alaska Department of Fish & Game has reciprocity with all 50 states and many other countries, and accepts these courses from other states and countries to meet current hunter education requirements in Alaska.

Many states have hunter education requirements for resident and nonresident hunters so it would not be a hardship for nonresident hunters to obtain a hunter education certification from their home state.

The department has several examples of both required and optional hunter orientation options such as the *Moose Hunter Orientation* which is required for all moose hunters in Units 7 and 15, and the "Is This Mose Legal" video which is optional to watch but highly encouraged. Orientations are used most often to address specific concerns such as area specific considerations like hunting close to highly populated areas (Anchorage hillside or Joint-Base-Elmendorf-Richardson), or stressing the difficulties and importance of reducing the harvest of female game animals, etc. It is difficult to quantify the success of orientation programs; though the department has seen some success when reducing the harvest of female mountain goats was the goal and when the board allocates use of a certain area (e.g., river corridors) to reduce hunter conflict.

Moose are not a guide-required species, though the board has allocated some moose hunting opportunity to both nonresidents guided by an Alaska-licensed guide and some to nonresidents who are not guided. Nonresidents hunting with resident relatives and nonresidents hunting on

their own are included in the "non-guided" category. Nonresident moose hunters are not statutorily required to be accompanied by either a relative or a guide.

Since the department began offering the Moose Hunter Orientation, which is required for all hunters to hunt moose in Units 7 and 15, 19,305 people have taken it, and of those, 2,110 provided an out of state mailing address. Residency is not captured when a user takes the orientation and some people have taken the orientation multiple times. Since the department began offering the Nonresident Moose Hunter Orientation course, which is required in Units 17A, 17B, 19B, 21A, and 21E, 1,832 people have taken the course. Like the Moose Hunter Orientation course, people who take the orientation are not required to provide their residency, and people can take the course multiple times.

In Regulatory Year 2023 (RY23), the department issued 3,022 general season moose harvest tickets to nonresident hunters. Of those, 2,048 reported hunting, and 919 reported successfully harvesting a moose. Of the 2,048 that reported hunting, 483 reported using a guide. There are no reporting requirements for moose hunters to report if they are either accompanied by a resident relative within second-degree of kindred or if they are accompanied by a resident.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on requiring nonresident moose hunters to attend a department-approved hunter orientation or education course. The department has concerns with requiring all nonresident moose hunters to be accompanied by guides or resident relatives within the second-degree of kindred because this is more akin to requiring guides or second-degree of kindred relatives statewide versus allocating within nonresident hunters in specific areas for specific reasons. Because the board has allocated between guided and nonguided nonresident moose hunters in specific areas and not statewide, the board should consult with the Department of Law for guidance on this proposal to determine if the authority exists for the board to make a species not required to be guided in statute, to be required to be guided in regulation.

COST ANALYSIS: Adoption of this proposal may result in additional cost to the department depending on the course and delivery method.

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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 mountain goats.

PROPOSED BY: Jon Nicholas Kruger

WHAT WOULD THE PROPOSAL DO? Require that all mountain goat hunters, statewide, pass the department's online quiz before hunting goats.

WHAT ARE THE CURRENT REGULATIONS? A person must successfully complete a department-approved hunter orientation course, to include sex identification, before hunting mountain goat in Units 1-5. In Units 6C and 6D a requirement for mountain goat hunters to successfully complete the department's on-line mountain goat quiz is included as a condition on all mountain goat registration permits.

There are positive customary and traditional (C&T) use findings for mountain goats in Units 1, 5, 6C, 6D, 7, and 15C outside of the nonsubsistence areas, with various amounts reasonably necessary for subsistence (ANS). There are negative C&T use findings for mountain goats in Units 4, 8, 11, and 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would require all hunters participating in mountain goat hunts to pass the department's online quiz before hunting. The goal of this proposal is to require mountain goat hunters to demonstrate ability to distinguish male (billy) from female (nanny) mountain goats before hunting to encourage take of billies. The department's online educational materials explain that goat populations are sensitive to nanny harvest and help hunters identify features that distinguish billies from nannies. Passing the department's online quiz demonstrates that a hunter has learned the key identifying features of billies and nannies. Harvesting fewer female goats will increase long-term harvest opportunity for mountain goats. Educating hunters to distinguish billies from nannies would also benefit management goals in hunts like RG480 in Unit 8 where nanny take is encouraged.

BACKGROUND: Harvesting nannies usually limits long-term harvest potential, particularly in native (not introduced) goat populations. Nannies do not breed until they are 5 years old; nannies in native populations normally give birth to one kid every other year. Twinning is rare. Nannies generally live 10-12 years so, on average, a nanny will produce only 3-4 kids in her lifetime. Assuming a 50:50 sex ratio at birth and average kid survival to breeding age, a typical nanny will barely replace herself in the population. Although nannies in introduced populations tend to be more productive, this inherently low rate of productivity in native populations is why most goat populations are sensitive to nanny harvest and why long-term harvest opportunity is maximized by harvesting billies.

In most units, the department manages goat populations with a guideline harvest level point system where, for every 100 adult goats counted during a survey, 6 goat points are allocated for harvest. A billy is valued at one point and a nanny is valued at two points. When the harvest point total for individual hunt areas is reached, the hunt is closed by emergency order. If only billies are harvested, six goats or roughly 6% of the count can be harvested. However, if only nannies are taken, only three goats can be harvested and productivity of the population will be reduced, limiting future harvest opportunity.

Goat hunters have been required to pass the department's on-line goat quiz as a permit condition in Units 1D, 6C, and 6D for nearly a decade. In 2023 the board adopted that requirement into regulation for all goat hunts in Units 1-5. To evaluate the effect of requiring hunters to pass the quiz, we compared the percentage of nannies in the harvest for the 5 years prior to the quiz being required (RY2018-RY2022) for Units 1A, 1B, 1C, 4, and 5 with the percentage of nannies in the harvest in RY2023 and hunts to date in RY2024 (some hunts remain open). In the 5 years prior to the quiz being required, nannies made up 19% of the harvest in those units. From data available for RY2023 and through November 22 in RY2024, nannies made up 13% of the harvest. More years of data are needed to better evaluate the effect of requiring the quiz.

The goat quiz has been required as a permit condition in Unit 1D since RY2016. In the first year after the quiz was required, nannies made up 46% of the harvest. However, since then, the percentage of nannies in the Unit 1D harvest has ranged from 13% - 32%.

Penalties for taking nannies may have greater influence on how selective individual hunters are when harvesting goats. In GMU 4, from RY2012-RY2016 individual goat hunt areas were closed in the year after a nanny was taken. Under that strategy, nannies accounted for just over 10% of the harvest. However, after RY2016 that practice was relaxed and the proportion of nannies in the harvest increased and has averaged about 20%.

The department is currently testing a different incentive to encourage resident hunters to take billies in Unit 1D. In that unit, most goats are taken by Unit 1D residents and nannies typically account for about 30% of the harvest. Beginning in RY2023 resident hunters who take a nanny in Unit 1D were ineligible to hunt goats in Unit 1D during the following regulatory year. The effect of this incentive to take billies is not yet clear.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department can sustainably manage goat populations and harvest with or without requiring hunters to review educational material and pass a quiz. However, reducing harvest of nannies will allow greater harvest over the long term.

To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a normally diligent hunter with reasonable opportunity of success in taking a goat for subsistence uses if the proposal is adopted.

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

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PROPOSAL 91 – 5 AAC 92.003 Hunter education and orientation requirements. Require all goat hunters pass an online mountain goat quiz prior to hunting mountain goats.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? Require that all hunters participating in registration or draw hunts for mountain goats statewide pass the department's online quiz before hunting goats.

WHAT ARE THE CURRENT REGULATIONS? A person must successfully complete a department-approved hunter orientation course, to include sex identification, before hunting mountain goat in Units 1-5. In Units 6C and 6D a requirement for mountain goat hunters to successfully complete the department's on-line mountain goat quiz is included as a condition on all mountain goat registration permits.

There are positive customary and traditional (C&T) use findings for mountain goats in Units 1, 5, 6C, 6D, 7, and 15C outside of the nonsubsistence areas, with various amounts reasonably

necessary for subsistence (ANS). There are negative C&T use findings for mountain goats in Units 4, 8, 11, and 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting this proposal would require all hunters participating in registration and draw hunts for mountain goats to pass the department's online quiz before hunting. The goal of this proposal is to require mountain goat hunters to demonstrate ability to distinguish male (billy) from female (nanny) mountain goats before hunting to encourage take of billies. The department's online educational materials explain that goat populations are sensitive to nanny harvest and help hunters identify features that distinguish billies from nannies. Passing the department's online quiz demonstrates that a hunter has learned the key identifying features of billies and nannies. Harvesting fewer nannies will increase long term harvest opportunity for mountain goats. Educating hunters to distinguish billies from nannies would also benefit management goals in hunts like RG480 in Unit 8 where nanny take is encouraged.

BACKGROUND: Harvesting nannies usually limits long-term harvest potential, particularly in native (not introduced) goat populations. Nannies do not breed until they are 5 years old; nannies in native populations normally give birth to one kid every other year. Twinning is rare. Nannies generally live 10-12 years so, on average, a nanny will produce only 3-4 kids in her lifetime. Assuming a 50:50 sex ratio at birth and average kid survival to breeding age, a typical nanny will barely replace herself in the population. Although nannies in introduced populations tend to be more productive, this inherently low rate of productivity in native populations is why most goat populations are sensitive to nanny harvest and why long term harvest opportunity is maximized by harvesting billies.

In most units, the department manages goat populations with a guideline harvest level point system where, for every 100 adult goats counted during a survey, 6 goat points are allocated for harvest. A billy is valued at one point and a nanny is valued at two points. When the harvest point total for individual hunt areas is reached, the hunt is closed by emergency order. If only billies are harvested, six goats or roughly 6% of the count can be harvested. However, if only nannies are taken, only three goats can be harvested and productivity of the population will be reduced limiting future harvest opportunity.

Goat hunters have been required to pass the department's on-line goat quiz as a permit condition in Units 1D, 6C, and 6D for nearly a decade. In 2023 the board adopted that requirement into regulation for all goat hunts in Units 1-5. To evaluate the effect of requiring hunters to pass the quiz, we compared the percentage of nannies in the harvest for the 5 years prior to the quiz being required (RY2018-RY2022) for Units 1A, 1B, 1C, 4, and 5 with the percentage of nannies in the harvest in RY2023 and hunts to date in RY2024 (some hunts remain open). In the five years prior to the quiz being required, nannies made up 19% of the harvest in those units. From data available for RY2023 and through November 22 in RY2024 nannies made up 13% of the harvest. More years of data are needed to better evaluate the effect of requiring the quiz.

The goat quiz has been required as a permit condition in Unit 1D since RY2016. In the first year after the quiz was required, nannies made up 46% of the harvest. However, since then, the percentage of nannies in the Unit 1D harvest has ranged from 13% - 32%.

Penalties for taking nannies may have greater influence on how selective individual hunters are when harvesting goats. In GMU 4, from RY2012-RY2016 individual goat hunt areas were closed in the year after a nanny was taken. Under that strategy, nannies accounted for just over 10% of the harvest. However, after RY2016 that practice was relaxed and the proportion of nannies in the harvest increased and has averaged about 20%.

The department is currently testing a different incentive to encourage resident hunters to take billies in Unit 1D. In that unit most goats are taken by Unit 1D residents and nannies typically account for about 30% of the harvest. Beginning in RY2023 hunters who take a nanny in Unit 1D were ineligible to hunt goats in Unit 1D during the following regulatory year. The effect of this incentive to take billies is not yet clear.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department can sustainably manage goat populations and harvest with or without requiring hunters to review educational material and pass a quiz. However, reducing harvest of nannies will allow greater harvest over the long term.

To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a normally diligent hunter with reasonable opportunity of success in taking a goat for subsistence uses if the proposal is adopted.

COST ANALYSIS: Adoption of this proposal to expand that requirement statewide would not result in additional costs for the department.

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PROPOSAL 92 – 5 AAC 92.003. Hunter education and orientation requirements. Require all Dall sheep hunters to complete an online education course prior to hunting.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? This proposal would require all sheep hunters to complete an online education course on identifying a legal ram prior to hunting sheep.

WHAT ARE THE CURRENT REGULATIONS? There is currently no legal requirement for sheep hunters to educate themselves prior to going afield. The department has educational material available upon request at offices and online to help hunters determine whether a ram is legal or not.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Prospective sheep hunters would be required to complete an online education course before going afield.

BACKGROUND: In most years, animals less than 8 years of age or that have not reached the legal definition of full curl (referred to as sublegal animals) comprise between 5% and 10% of

the total sheep harvest. While sublegal harvest is undesirable, this small fraction of an already conservative total harvest relative to population size is not likely to have a biological effect; unlike in mountain goats where high levels of nanny harvest have been demonstrated to alter population trajectory. The department has educational materials available at offices and online, and biologists are available in person in most offices to assist and educate sheep hunters.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. While a required education course may reduce the harvest of sublegal rams, the overall impact is unknown and difficult to assess. Previous experience with required courses intended to reduce the harvest of female mountain goats produced mixed results without clear indication of addressing the concern.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department to administer the course and issue the certification.

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PROPOSAL 93 – 5 AAC 92.171. Sealing of horns and antlers. Repeal the requirement to permanently seal sheep horns.

PROPOSED BY: Jesse Dunshie

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would eliminate the requirement for sheep horns to be permanently sealed with a metal plug.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.171. Sealing of horns and antlers.

(a) A person may not alter, possess, transport, or export from the state, the horns of a Dall sheep ram taken in any hunt where there is a horn configuration bag limit, the horns of a Dall sheep ram taken in Units 6-11 and Units 13-17, or the horns of a Dall sheep taken under a registration permit in Unit 19(C), unless the horns have been permanently sealed by a department representative within 30 days after the taking, or a lesser time if designated by the department; except the horns of a 3/4-curl or less sheep taken in the registration hunt in Units 25(A) and 26(C) do not need to be sealed.

Rams harvested in hunts that have horn restrictions are required to be permanently sealed. with a uniquely numbered metal plug that is placed in a hole drilled into the horn during the sealing process.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Harvested rams would still be checked and measured by department personnel but would receive a nonpermanent seal rather than a permanent one.

BACKGROUND: Sealing and associated permanent marking has been required in Alaska since 2005 and earlier in other Western United States and Canadian jurisdictions that offer sheep hunts.

It is a standard practice and many taxidermists will not accept horns that have not been permanently marked. In addition, permanent marking has aided law enforcement personnel in several poaching investigations and the shavings resulting from drilling have been used in multiple scientific studies.

The department permanently seals sheep by drilling a hole into the horn and inserting a uniquely numbered metal plug into the hole. This method of "plugging" sheep is widely used and required in most U.S. states. The plug was developed by the Foundation for North American Wild Sheep. The plug is about an inch long and shaped like a nail, with a flat head approximately ½-inch in diameter. The hole is drilled with a countersink, so the head of the plug will be flush or slightly below the surface of the horn.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. This method of permanently marking sheep ensures the department has seen each ram harvested and collected the necessary information to help manage these highly sought after animals. Horns are valuable to hunters, carvers, and collectors, and requiring them to be permanently sealed helps prevent exploitation of the resource and is an effective enforcement tool.

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

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PROPOSAL 94 – 5 AAC 92.990. Definitions. Change the definition of full-curl ram to specify the angle in which to view the curl.

PROPOSED BY: Herb Mansavage

WHAT WOULD THE PROPOSAL DO? The words "when viewed squarely from the side at right angles to the center of the skull" would replace "whose tip of at least one horn has grown through 360-degrees of a circle described by the outer surface of the thorn" in the definition of "full-curl horn".

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.990(a)(30) "full-curl horn" of a male (ram) Dall sheep means that

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

(B) both horn tips are 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, or

(C) the sheep is at least eight years of age as determined by horn growth annuli;

Currently, a ram is judged to be full curl if the "…tip of at least one horn has grown through 360° of a circle, described by the outer surface of the horn, as viewed from the side." Department personnel apply three standardized methods of assessing horn curl to determine if a ram meets this definition. A ram is considered legal if it meets the criteria specified by any one of the three methods.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would change the definition of a full curl ram so that the 'stick method' would be the only way to determine if a ram met the definition of full curl. This would effectively eliminate two of the three possible ways a ram could meet the criteria for legality.

BACKGROUND: Sheep horns do not always grow in such a way that a view from right angles to the center of the skull provides the optimal angle to assess whether a ram is legal. Due to natural variation in horn growth patterns, legality is best assessed by viewing the horn along the center axis of curl. The center axis of the curl varies from ram to ram and is not always square to the side or perpendicular to the center of the ram's skull. The three standardized methods already in use allow hunters to account for natural variability in horn growth when assessing whether a ram is legally eligible for harvest.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. While rare, there are times when having multiple strategies to determine full-curl benefits the hunter and losing 1-2 options may result in a negative impact to the hunter. At this point, the animal has already been removed from the population and adoption of this proposal could result in more sheep being confiscated due to being considered sublegal. The three options of determining if a sheep is legal currently aid in ensuring those extremely difficult rams to judge are offered maximum opportunity to be legal while keeping with the spirit of protecting sheep populations by allowing only the harvest of full-curl rams.

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

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PROPOSAL 95– 5 AAC 92.990(30). Definitions. Repeal the age criteria for full-curl horn rams.

PROPOSED BY: Jack Reakoff

WHAT WOULD THE PROPOSAL DO? The proposal would change the legal definition of "full-curl horn" of a male (ram) Dall sheep. Specifically, a full-curl ram would not be considered legal based on an age of eight as determined by horn growth annuli.

WHAT ARE THE CURRENT REGULATIONS?

The "full-curl horn" of a male (ram) Dall sheep means that

(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 WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is unclear if removing the age component from the legal definition would reduce the overall number of sublegal take, which is currently low (annual average of 6%).

BACKGROUND: Sheep hunting in Alaska has predominately been managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have higher natural mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a drastically lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small portion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small portion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

Minimum count surveys throughout the state suggest there has been a 40-70% decline in sheep populations since the most recent highs which occurred during 2010-2012. The decline in abundance mirrors the declines reported by the National Park Service in Denali, Lake Clark, and Gates of the Arctic National parks, as well as reported declines in sheep numbers throughout the Yukon Territory and British Columbia. Severe weather, including prolonged springs and icing

events, likely caused a near collapse of recruitment in some years, as well as increased adult mortality.

Weather-related sheep population declines are not without precedent. For example, Murie (1944) reported a robust population of Dall sheep in Denali National Park in 1928, but record snow fall and harsh winter conditions during the winters of 1928/1929 and 1931/1932 resulted in a sharp reduction in sheep abundance. A more contemporary example was observed in Unit 20A where sheep populations and harvest in this GMU were high until a weather-related population decline during the winter of 1992/1993. Managers chose to maintain the hunt structure as general harvest open to both residents and nonresidents. Although it took approximately 15-20 years to rebuild, sheep populations and harvest returned to pre-decline levels and it is unlikely that the conservative harvest of full-curl rams during this period slowed the population recovery.

Although there is a liberal 42-day general season spanning August 10 -September 20, more than half of the harvest occurs within the first 10 days of the season. Sheep hunters have ample opportunity to hunt after the first 10 days of the season and avoid either real or perceived overcrowding. Sheep hunter participation in Alaska peaked in 1989 with 3,337 reported hunters and has averaged 2,478 (Range: 1,556 -3,012) for the years 2000-2023. There was a substantial drop in hunter participation in 2022 (n=1,816) and 2023 (n=1,556), which suggests that hunters are either self-regulating during the current low sheep population levels and/or were impacted by recent federal (e.g., Federal Subsistence Board closure of sheep hunting in portions of the Brooks Range) or state closures (e.g. Unit 19C closure for non-residents). Success rates for sheep hunters in Alaska from 2000-2023 have averaged 30.1% (Range: 21.9% - 34.8%).

Horn morphometric work by ADF&G has demonstrated that, on a statewide basis for the years 2016-2023, between 57% and 66% of the rams harvested each year were legally available for harvest at least one previous hunting season after attaining 360 degrees of curl. For general season sheep hunts managed under the current definition of full-curl from 2007-2023, an average of 7.3% (range:4.7% - 12.1%) of the rams harvested were less than 360° that had a lamb tip present (i.e., not double broomed), were ≥ 8 years of age. During this same time period, there was an average of 6 % (range: 2.5% - 9.9%) of the harvest that was illegal take of rams less than 8 years of age, with a lamb tip present, and with less than 360° of horn curl. However, this estimate is inflated because 226 of the 577 rams that failed to meet the full curl definition were harvested from Unit 11 where federally qualified hunters can take any ram on a state harvest ticket.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. There is no biological concern with the current hunt management structure and the full curl bag limit as currently defined. The department has no data on which of the three current criteria, or combination thereof, individual hunters use in the field to ultimately decide to harvest a ram. However, if field-determined age is a criteria often used, this proposal may reduce sublegal harvest. Alternatively, there are likely situations where hunters have mistakenly judged a ram to have obtained 360° of horn curl, but the ram does meet the age requirement.

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

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PROPOSAL 96– 5 AAC 92.990(30). Definitions. Repeal the age criteria for full-curl horn rams.

PROPOSED BY: Western Interior Regional Advisory Council

WHAT WOULD THE PROPOSAL DO? The proposal would change the legal definition of "full-curl horn" of a male (ram) Dall sheep. Specifically, a full-curl ram would not be considered legal based on an age of eight as determined by horn growth annuli.

WHAT ARE THE CURRENT REGULATIONS?

The "full-curl horn" of a male (ram) Dall sheep means that

(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,

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(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 WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is unclear if removing the age component from the legal definition would reduce the overall number of sublegal take, which is currently low (annual average of 6%).

BACKGROUND: Sheep hunting in Alaska has predominately been managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have higher natural mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the

older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a drastically lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small portion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small portion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

Minimum count surveys throughout the state suggest there has been a 40-70% decline in sheep populations since the most recent highs which occurred during 2010-2012. The decline in abundance mirrors the declines reported by the National Park Service in Denali, Lake Clark, and Gates of the Arctic National parks, as well as reported declines in sheep numbers throughout the Yukon Territory and British Columbia. Severe weather, including prolonged springs and icing events, likely caused a near collapse of recruitment in some years, as well as increased adult mortality.

Weather-related sheep population declines are not without precedent. For example, Murie (1944) reported a robust population of Dall sheep in Denali National Park in 1928, but record snow fall and harsh winter conditions during the winters of 1928/1929 and 1931/1932 resulted in a sharp reduction in sheep abundance. A more contemporary example was observed in Unit 20A where sheep populations and harvest in this GMU were high until a weather-related population decline during the winter of 1992/1993. Managers chose to maintain the hunt structure as general harvest open to both residents and nonresidents. Although it took approximately 15-20 years to rebuild, sheep populations and harvest returned to pre-decline levels and it is unlikely that the conservative harvest of full-curl rams during this period slowed the population recovery.

Although there is a liberal 42-day general season spanning August 10 -September 20, more than half of the harvest occurs within the first 10 days of the season. Sheep hunters have ample opportunity to hunt after the first 10 days of the season and avoid either real or perceived overcrowding. Sheep hunter participation in Alaska peaked in 1989 with 3,337 reported hunters and has averaged 2,478 (Range: 1,556 -3,012) for the years 2000-2023. There was a substantial drop in hunter participation in 2022 (n=1,816) and 2023 (n=1,556), which suggests that hunters are either self-regulating during the current low sheep population levels and/or were impacted by recent federal (e.g. Federal Subsistence Board closure of sheep hunting in portions of the Brooks Range) or state closures (e.g. Unit 19C closure for non-residents). Success rates for sheep hunters in Alaska from 2000-2023 have averaged 30.1% (Range: 21.9% - 34.8%).

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was an average of 6 % (range: 2.5% - 9.9%) of the harvest that was illegal take of rams less than 8 years of age, with a lamb tip present, and with less than 360˚ of horn curl. However, this estimate is inflated because 226 of the 577 rams that failed to meet the full curl definition were harvested from Unit 11 where federally qualified hunters can take any ram on a state harvest ticket.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. There is no biological concern with the current hunt management structure and the full curl bag limit as currently defined. The department has no data on which of the three current criteria, or combination thereof, individual hunters use in the field to ultimately decide to harvest a ram. However, if field-determined age is a criteria often used, this proposal may reduce sublegal harvest. Alternatively, there are undoubtedly situations where hunters have mistakenly judged a ram to have obtained 360˚ of horn curl, but the ram does meet the age requirement.

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

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PROPOSAL 97 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.
Lengthen the time period hunters are restricted from using aircraft to locate sheep or direct hunters to sheep.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? The proposal would lengthen the timeframe sheep hunters are prohibited from using aircraft to locate sheep or direct hunters to sheep by 10 days. The proposal would change the dates from the existing August 10 - September 20, to August 1 - September 20.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.085. Unlawful methods of taking big game, exceptions. The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:
…

(8) a person who has been airborne may not take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. following the day in which the flying occurred, and from August 10 through September 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during 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. The Board of Game finding 2016-213-BOG , dated March 17, 2016, is adopted by reference. This prohibition does not prohibit any flight maneuvers that are necessary to make an informed and safe landing in the field. Restrictions in this paragraph do not apply to

(A) taking deer;

(B) repealed 7/1/92;

(C) a person flying on a regularly scheduled commercial airline, including a commuter airline;

(D) repealed 7/1/2015;

(E) repealed 7/1/2009;

(F) repealed 7/1/2008;

(G) a hunter taking a bear at a bait station with the use of bait or scent lures with a permit issued under 5 AAC 92.044, and if the hunter is at least 300 feet from the airplane at the time of taking;

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

Youth hunts take place August 1 - August 5, and most general season sheep hunts take place August 10 - September 20.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, aircraft would no longer be able to be used to spot sheep during the youth hunt. Hunters would have a reduced time period to spot sheep prior to the opening of the sheep hunting season. It is possible sheep harvest success rates may decrease slightly as a result of extending the aircraft restrictions.

BACKGROUND: Effective in 2015, the board adopted a regulation stating that, from August 10 - September 20, aircraft may only be used by and for sheep hunters to place and remove hunter sand 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. Effective in 2016, the board created the youth hunts for hunters aged 10-17 in all areas open to sheep hunting by general season harvest ticket. The board did not extend the aircraft restriction to cover the youth hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is a methods and means issue. The proponent notes that adoption of the proposal may decrease aviation hazards during sheep season. However, adoption of the proposal may result in more hunters spotting sheep in July when the department is conducting sheep surveys. This may result in additional safety concerns in congested areas. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

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PROPOSAL 98 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Lengthen the time period hunters are restricted from using aircraft to locate sheep or direct hunters to sheep.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? The proposal would lengthen the time frame sheep hunters are prohibited from using aircraft to locate sheep or direct hunters to sheep by 35 days. The proposal would change the dates from the existing August 10 - September 20, to August 1 - October 15.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.085. Unlawful methods of taking big game, exceptions. The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

…

(8) a person who has been airborne may not take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. following the day in which the flying occurred, and from August 10 through September 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during 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. The Board of Game finding 2016-213-BOG , dated March 17, 2016, is adopted by reference. This prohibition does not prohibit any flight maneuvers that are necessary to make an informed and safe landing in the field. Restrictions in this paragraph do not apply to

(A) taking deer;

(B) repealed 7/1/92;

(C) a person flying on a regularly scheduled commercial airline, including a commuter airline;

(D) repealed 7/1/2015;

(E) repealed 7/1/2009;

(F) repealed 7/1/2008;

(G) a hunter taking a bear at a bait station with the use of bait or scent lures with a permit issued under 5 AAC 92.044, and if the hunter is at least 300 feet from the airplane at the time of taking;

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

Youth hunts take place August 1 - August 5, and most general season sheep hunts take place August 10 - September 20, some drawing permit hunts extend into October.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, aircraft would no longer be able to be used to spot sheep during the youth hunt or later season hunts. Hunters would have a reduced time period to spot sheep prior to the opening of the sheep hunting season. It is possible sheep harvest success rates may decrease slightly as a result of extending the aircraft restrictions.

BACKGROUND: Effective in 2015, the board adopted a regulation stating that, from August 10 - September 20, aircraft may only be used by and for sheep hunters to place and remove hunter

sand 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. Effective in 2016, the board created the youth hunts for hunters aged 10-17 in all areas open to sheep hunting by general season harvest ticket. The board did not extend the aircraft restriction to cover the youth hunt. The drawing hunts that extend into October were also in existence when the board adopted the existing aircraft restriction dates and the board chose not to extend the restriction to cover those as well. Unlike the youth hunts, and with the exception of the archery only hunt within the Dalton Highway Corridor Management Area, the later season sheep hunts are either drawing permit hunts or hunts in areas with a positive C&T finding that provide an opportunity for subsistence.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it a methods and means issue and does not create a biological concern. Adoption of the proposal may result in more hunters spotting sheep in July when the department is conducting sheep surveys. This may result in additional safety concerns for congested areas. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

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PROPOSAL 99 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Shorten the time period hunters are restricted from using aircraft to locate sheep or direct hunters to sheep, and modify aircraft use for the last 31 days of the season.

PROPOSED BY: Dan Montgomery

WHAT WOULD THE PROPOSAL DO? The proposal would shorten the timeframe sheep hunters are prohibited from using aircraft to locate sheep or direct hunters to sheep by 31 days. The proposal would change the dates from the existing August 10 - September 20, to August 10 - August 20. The proposal would modify the aircraft restrictions for the remaining 31 days of the season by not allowing the use of aircraft to intentionally approach any closer than 1500 feet or 500 yards from any sheep for the purpose of hunting them.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.085. Unlawful methods of taking big game, exceptions. The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

…

(8) a person who has been airborne may not take or assist in taking a big game animal and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. following the day in which the flying occurred, and from August 10 through September 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during 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. The Board of Game finding 2016-213-BOG , dated March 17, 2016, is adopted by reference. This prohibition does not prohibit any flight maneuvers that are necessary to make an informed and safe landing in the field. Restrictions in this paragraph do not apply to

(A) taking deer;

(B) repealed 7/1/92;

(C) a person flying on a regularly scheduled commercial airline, including a commuter airline;

(D) repealed 7/1/2015;

(E) repealed 7/1/2009;

(F) repealed 7/1/2008;

(G) a hunter taking a bear at a bait station with the use of bait or scent lures with a permit issued under 5 AAC 92.044, and if the hunter is at least 300 feet from the airplane at the time of taking;

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

Youth hunts take place August 1 - August 5, and most general season sheep hunts take place August 10 - September 20.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, there would be no change to the aircraft restrictions for the first 11 days of the season. After that, aircraft could be used to locate sheep provided the aircraft did not intentionally approach to less than 500 yards of the sheep. It is possible harvest success rates may increase slightly as a result of relaxing the aircraft restrictions in the last 31 days of the season.

BACKGROUND: Effective in 2015 the board adopted a regulation that stated from August 10 - September 20, aircraft may only be used by and for sheep hunters to place and remove hunter sand 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. Effective in 2016, the board created the youth hunts for hunters aged 10-17 in all areas open to sheep hunting by general season harvest ticket. The board did not extend the aircraft restriction to cover the youth hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is a methods and means issue and because it does not create a biological concern. The proposal could possibly result in an increase in the number of sheep harvested. In addition, the department does not manage nor have authority over airspace which makes implementation and/or enforcement of the 1500 ft. buffer difficult to apply and enforce.

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

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PROPOSAL 100 – 5 AAC 92.05. Special provisions for Dall sheep and mountain goat drawing permit hunts. Limit nonresident sheep hunting opportunity statewide so that nonresident harvest does not constitute more than 35% of total sheep harvest from any game management subunit as follows:

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? The proposal would limit nonresident sheep hunting opportunity statewide in a manner whereby nonresident harvest does not constitute more than 35% of the total sheep harvest from any game management subunit.

WHAT ARE THE CURRENT REGULATIONS? Nonresidents currently hunt many areas of the state using general season harvest tickets. Some areas provide opportunity through drawing permits that have an existing allocation between residents and nonresidents and others that have an allocation between guided nonresidents and non-guided nonresidents. See 5 AAC 85.055 for seasons and bag limits and 5 AAC 92.057 for allocations of drawing permit hunts. Currently there are no allocations for general season harvest ticket sheep hunts. Also see 2024-2025 Alaska Hunting Regulations, and 2024-2025 Alaska Drawing Permit Hunt Supplement for additional information.

The board has made positive customary and traditional use (C&T) findings for sheep as follows: Unit 11, with an amount necessary for subsistence (ANS) of 60-75; Unit 19, with an ANS of 1-5; Units 23 and 26A, that portion west of the Etivluk River (DeLong Mountains), with an ANS of

0-9; Unit 23, Baird Mountains, with an ANS of 18-47; Units 23 and 26A, that portion east of the Etivluk River (Schwatka Mountains), with an ANS of 2-4; and Units 23, 24, 25A, and 26 (Brooks Range), with an ANS of 75-125.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the board will need to create additional sheep drawing hunts in all areas that are currently open as general season harvest ticket hunts in order to limit nonresident sheep hunters to 35% of the annual harvest for individual subunits. This is because general season harvest tickets are not limited for any general season hunts. The department would rely on historical average harvests to estimate the anticipated total harvest. There would be no changes to existing allocations found in 5 AAC 92.057.

BACKGROUND: Board policy (2017-222-BOG) indicates that allocation for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 or more years. The board has allocated hunting opportunity previously between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity or harvest have been addressed previously by the board at meetings covering Regions II, III, IV, V and statewide.

Of the hunts managed by general season harvest ticket, nonresident sheep hunters accounted for 20% of the sheep hunters between regulatory year (RY) 2014 and RY2023. On average they

harvested 42% of the sheep and there were an average of 384 nonresidents participating annually.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of sheep hunting opportunity between resident and nonresident hunters. Limiting nonresidents to 35% of the available harvest may increase the number of legal rams available to residents and may increase resident success rates in some cases. There is no other similar harvest guideline in regulation and the department will need to look to previous season averages to develop recommendations for the number of permits to make available for nonresidents in each area. If the board adopts the proposal the department requests guidance on how many years of harvest data to analyze to determine the number of permits to be issued in each area. The board may also want to consider deferring this proposal to the regional meetings so the individual areas can be discussed at the regularly scheduled board meetings for each area.

COST ANALYSIS: Adoption of this proposal will result in additional costs to the department in the form of creating and implementing numerous new hunts.

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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.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal adds sheep to the list of species identified as important for providing high levels of human consumptive use and would establish the threshold of average annual historic human harvest values for the species. Adding sheep to 5 AAC 92.106 and establishing an annual harvest threshold will provide the framework for developing intensive management (IM) programs for Dall's sheep.

WHAT ARE THE CURRENT REGULATIONS?

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;

(B) accessibility to harvest;

(C) utilization for meat: a population that is used primarily for food; and

(D) level of hunter demand: as reflected by total hunter effort, number of applications for permits, or other indicators;

There are varying customary and traditional use findings (C&T) and associated amounts reasonably necessary (ANS) for subsistence uses for sheep across the state. Existing findings and ANS amounts are found in 5 AAC 99.025(a)(10).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the board would need to deliberate future proposals at regularly scheduled board meetings to determine which sheep populations or portions of populations were important for providing high levels of human consumptive use; and to establish the population objectives and harvest objectives for those populations the board finds have a positive IM finding.

BACKGROUND: 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 that the board identifies 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 thereby 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; the board has set an average annual historic human harvest size for the three current IM species (caribou, deer, and moose). The board 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.

Dall Sheep populations throughout Alaska and Northern Canada are currently below historic norms due primarily to severe winter weather events in 2020, 2021, and 2023. This population reduction, along with lost cohorts from 2012 and 2013 (also due to severe winter weather), has resulted in low harvest for the last 3 years. Declines in Dall sheep populations have been seen in hunted and unhunted lands throughout all eight mountain ranges in Alaska that contain sheep. Population recovery requires positive recruitment and good adult survival. Adult survival is largely driven by winter severity. Recruitment is driven by lamb production and survival. Lamb survival is the only one of these factors that we may be able to address significantly.

IM, from its inception as the IM law in 1994, has been directed toward high harvest of moose, caribou, and deer. These species are managed for high levels of consumptive use (i.e, harvest of meat for food for Alaskans). The state of Alaska achieves this high harvest level through harvesting these populations as close to maximum sustained yield as is possible. This is done by administering regulations that aim to keep populations within defined parameters. When possible, opportunity is offered to harvest females, bag limits of more than one, and seasons that allow for increased access. For Dall's Sheep, the state of Alaska does not manage for harvest that is near maximum sustained

yield. Regulations limit harvest to a small proportion of the population that only includes mature rams.

DEPARTMENT COMMENTS: The department submitted the proposal as a means of facilitating a discussion on the subject, and is NEUTRAL on adding sheep as an IM species.

This proposal is likely the first step to an in-depth assessment of managing sheep through IM. Sheep are not a species authorized for IM activities in 5 AAC 92.106; however, AS 16.05.255 is silent on individual species. The board will need to determine if sheep meet the requirements of the statute, and then determine the appropriate harvest threshold (e.g., annual take of moose is ≤100). Then the board will need to evaluate sheep populations statewide to determine a positive or negative IM finding.

IM authorities include habitat improvement and predator control. At this time it is unknown if sheep habitat improvement is possible or practical, nor is it clear that habitat is a limiting factor for low sheep abundance.

Predator removal considerations for sheep are extremely complex. In most Alaska IM programs the department focuses on two predator species; bears and wolves. Predation of sheep have been documented or theorized to be by wolves, bears, wolverine, coyote, and golden eagles. Contemplation of predator removal to benefit sheep is unique to the department, because it is not currently an IM species and research does not indicate predation is the leading factor contributing to low sheep numbers. Efforts should be made to ascertain predation levels by each of the species to focus efforts if predator removal is directed. There are federal regulatory challenges to removing golden eagles. Another hurdle is to determine how efficiently and safely remove predators identified as contributing to low sheep abundance.

Observations and historic fluctuations in sheep populations indicate low sheep abundance is due to extreme winter weather. As recently as winter 2025 deep snows are accumulating on various sheep ranges, and a number of rain on snow events have occurred. The impacts of habitat status and predation on sheep are unknown. The department has the authority to remove predators outside of established IM programs if research indicates predation is a leading contributor to declines in sheep populations or is preventing depressed populations from recovering.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department in the form of assessing each sheep population to aid the board in determining if the population warranted a positive or negative IM finding.

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PROPOSAL 102 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the resident winter hunt and the nonresident sheep hunt in Unit 19C.

PROPOSED BY: Anthony Marchini

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C winter resident hunt and reopen nonresident sheep hunting with season dates from August 15 – September 10.

WHAT ARE THE CURRENT REGULATIONS? The Unit 19C winter hunt was not closed by the board and is currently open from Oct 1 – Apr 30. There currently is no nonresident sheep hunting in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted there would be no change to the winter hunt because it was not closed by the board. Nonresidents however would be able to harvest one full curl ram every four years with

season dates of Aug 15 – Sept 10. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season are scheduled to reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full curl horn restrictions from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then

decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 103 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the Unit 19C youth sheep hunt and the nonresident sheep hunt.

PROPOSED BY: Karen Gordon

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C youth hunt from Aug 1 – 5 and the nonresident hunt from August 10 – September 20.

WHAT ARE THE CURRENT REGULATIONS? There currently is no youth hunt or nonresident sheep hunting in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted youth hunting and nonresident hunting for sheep would be allowed in Unit 19C as it was prior to the passage of Proposal 204 in March 2023. Currently theses hunts are closed in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with a full curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26

sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 104 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the regular fall nonresident sheep hunt in Unit 19C.

PROPOSED BY: Spencer Pope, Seth Kroenke, Jeff Rost, Jon Burrows

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C nonresident sheep hunt from August 10 – September 20 with a bag limit of one full curl ram every four years.

WHAT ARE THE CURRENT REGULATIONS? There currently is no nonresident sheep hunting in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season

1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted nonresident hunting for sheep would be allowed in Unit 19C as it was prior to the passage of Proposal 204 in March 2023. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with a full curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider

whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 105 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the regular fall nonresident sheep hunt in Unit 19C.

PROPOSED BY: Taiga Resources Conservation

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C nonresident sheep hunt from August 10 – September 20 with a bag limit of 1 full curl ram every 4 years.

WHAT ARE THE CURRENT REGULATIONS? There currently is no nonresident sheep hunting in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	

NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted nonresident hunting for sheep would be allowed in Unit 19C as it was prior to the passage of Proposal 204 in March 2023. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that

same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that

allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 106 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the regular fall nonresident sheep hunt in Unit 19C.

PROPOSED BY: Jeff Pralle

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C nonresident sheep hunt from August 10 – September 20 with a bag limit of 1 full curl ram every 4 years.

WHAT ARE THE CURRENT REGULATIONS? There currently is no nonresident sheep hunting in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	

1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted nonresident hunting for sheep would be allowed in Unit 19C as it was prior to the passage of Proposal 204 in March 2023. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals

that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 107 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the youth sheep hunt and the fall nonresident sheep hunt in Unit 19C.

PROPOSED BY: Wayne Heimer

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C youth hunt from August 1 – 5 and the nonresident hunt from August 10 – September 20.

WHAT ARE THE CURRENT REGULATIONS? There is currently no youth hunt or nonresident sheep hunting in Unit 19C.

Units and Bag Limits	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	

1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted youth hunting and nonresident hunting for sheep would be allowed in Unit 19C as it was prior to the passage of Proposal 204 in March 2023. Currently there is no youth or nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of

difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural

causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 108 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Create a drawing hunt for nonresidents in Unit 19C, and allocate a percentage of the harvest to nonresidents.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would create a draw hunt for nonresidents in Unit 19C with up to 10 permits issued, or up to 25% of the harvestable surplus. The bag limit would be one full curl ram every four years with season dates from Aug 10 – Sept 20.

WHAT ARE THE CURRENT REGULATIONS? There currently is no nonresident sheep hunting in Unit 19C.

	Resident Open Season (Subsistence and	**Nonresident**

Units and Bag Limits	General Hunts)	Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted a drawing hunt would be created for nonresident sheep hunters in Unit 19C. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence

opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

Adoption of the first option, to have a limited number of permits available, is easily implemented and preferred by the department if the board intends to adopt the proposal.

Adoption of the second option, to provide for permits up to 25% of the harvestable surplus of sheep, would be difficult to implement: first, completing annual surveys is conditional on adequate weather such that in some years surveys are not completed; second, the timing of the drawing application precedes the full impact of potential overwinter mortality. If the second option is adopted the department may be forced to use outdated survey data which could either negatively impact ram abundance or result in extremely conservative harvest.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 109 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open an archery only fall sheep hunt for nonresidents in Unit 19C.

PROPOSED BY: Mike Harris

WHAT WOULD THE PROPOSAL DO? This proposal would reopen nonresident sheep hunting in Unit 19C by archery only with a bag limit of one full curl ram every four years and season dates of August 10 – September 20.

WHAT ARE THE CURRENT REGULATIONS? There currently is no nonresident sheep hunting in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted an archery only hunt would be created for nonresident sheep hunters in Unit 19C. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26

sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 162 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Change the sheep bag limit for resident hunters in Unit 19C to one ram every two regulatory years.

PROPOSED BY: Anthony Marchini

WHAT WOULD THE PROPOSAL DO? This proposal would change the Unit 19C resident bag limit for sheep to one full curl ram every two years.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted residents would only be able to harvest a full curl ram in Unit 19C every other year. The proposal is not clear how this new bag limit would affect the bag limit for the winter hunt.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested

compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board adopts this proposal, it will need to determine if the new regulations will continue to provide a reasonable opportunity for subsistence. The proposal is also not clear how this new bag limit would affect the bag limit for the winter hunt.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 111 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Create a variable bag limit for resident sheep hunters based on the age of the sheep harvested.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would create a variable bag limit for resident sheep hunters based on the age of the sheep harvested. It also suggests this same or similar bag limit for nonresidents when the current five-year closure ends.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory		

years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted residents would have the following bag limits:

Harvest an 8-year old or older ram and the 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 or younger ram and the hunter will be ineligible to hunt sheep for the next three seasons.

The proposal is not clear how this new bag limit would affect the bag limit for the resident winter hunt. Also, if this structure were applied to nonresidents, this would be a more liberal bag limit than the current statewide bag limit of one full curl ram every 4 years.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals

that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Creating a multi-tiered bag limit based on age would be difficult to track and enforce. This would create a challenging situation for enforcement of the new bag limit in situations where sheep are difficult to age. If a change is made to the nonresident bag limit, this would place Unit 19C out of alignment with the statewide nonresident bag limit of one full curl sheep every four years. Creating a multi-tiered bag limit based on the age of sheep harvested is also inconsistent with subsistence harvesting patterns. Subsistence hunters who participate in the winter hunt would be negatively affected by this proposal because by regulation they are required to shoot young rams. Additionally, this tiered bag limit structure potentially penalizes a person who takes a legal ram more than someone who shoots a sublegal ram. There is currently no good mechanism to track hunters from year to year to implement this, and if adopted the department suggests a delayed implementation in order to assess how to successfully implement the new regulations.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department if the department were expected to implement a new bag limit based on the age of the ram harvested and maintain a new database to track those hunters from year to year for enforcement purposes.

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 112 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Create a variable bag limit for resident sheep hunters based on the age of the sheep harvested.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would create a variable bag limit for resident sheep hunters based on the age of the sheep harvested. It also suggests this same or similar bag limit for nonresidents when the current 5-year closure ends.

WHAT ARE THE CURRENT REGULATIONS?

Resident

Units and Bag Limits	Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted residents would have the following bag limits:

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

Harvest of a full curl or larger ram 8 or 9 years old, the hunter will be ineligible to hunt sheep in Alaska the next season.

Harvest a full curl or larger 7 year old ram, the hunter will be ineligible to hunt sheep for the next 2 seasons.

Harvest a full curl or larger but 6 year or younger ram, the hunter will be ineligible to hunt sheep for the next 3 seasons.

The proposal is not clear how this new bag limit would affect the bag limit for the resident winter hunt. Also, if this structure were applied to nonresidents this would be a more liberal bag limit than the statewide bag limit of 1 full curl ram every 4 years.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

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Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Creating a multi-tiered bag limit based on age would be difficult to track and enforce. This would create a challenging situation for enforcement of the new bag limit in situations where sheep are difficult to age. If a change is made to the nonresident bag limit, this would place Unit 19C out of alignment with the statewide nonresident bag limit of 1 full curl sheep every 4 years. Creating a multi-tiered bag limit based on the age of sheep harvested is inconsistent with subsistence harvesting patterns. Subsistence hunters that participate in the winter hunt would be negatively affected by this proposal because by regulation they are required to shoot young rams. Additionally, this tiered bag limit structure potentially penalizes a person who takes a legal ram more than someone who shoot a sublegal ram. There is currently no good mechanism to track hunters from year to year to implement this, and if adopted the department suggests a delayed implementation in order to assess how to successfully implement the new regulations.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department if the department were expected to implement a new bag limit based on the age of the ram harvested and maintain a new database to track those hunters from year to year for enforcement purposes.

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 113 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Shorten the resident sheep hunting season and reopen a shorter nonresident sheep hunting season after the resident season opens in Unit 19C.

PROPOSED BY: Wayne Kubat

WHAT WOULD THE PROPOSAL DO? This proposal would shorten the Unit 19C resident sheep hunt with new dates of August 15 – September 10 and reopen a nonresident sheep hunt with season dates of August 21 – September 10.

WHAT ARE THE CURRENT REGULATIONS? The current fall resident season runs from Aug 10 – Sept 20 and there is no nonresident sheep hunting in Unit 19C.

Units and Bag Limits	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
Unit 19(C)		
RESIDENT HUNTERS:		
1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS:		
1 ram with full-curl horn or		

larger, every 4 regulatory years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted resident sheep hunting opportunity would be reduced and a nonresident season would be opened with a start date seven days after the opening for residents. It is anticipated that total harvest would be less than it would if both seasons were open for the typical fall season, from August 10 – September 20. Currently there is no nonresident sheep hunting opportunity in Unit 19C through regulatory year (RY) 27.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22,

the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that

allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting, they may wish to consider whether the existing resident general season and winter subsistence hunts provide reasonable opportunity for subsistence uses.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 114 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Change all resident sheep hunts in Unit 19C to archery only, and require any future nonresident hunts to be archery only as well.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would change resident sheep hunting in Unit 19C to archery only and when the nonresident season reopens it would do so with archery only.

WHAT ARE THE CURRENT REGULATIONS? The current regulations allow residents in Unit 19C to use a rifle or archery equipment. There is currently no nonresident season for sheep in Unit 19C.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or		

larger; or	Aug. 10 - Sept. 20
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted all hunters would be limited to archery only. This proposal appears to address the fall season, but it is unclear if it is intended to be a requirement for the winter hunt as well. Additionally, this proposal may make it more difficult for hunters who traditionally use rifles to harvest sheep and who do not have access to instructive archery classes. Expected harvest from archery only hunts is quite low.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limits from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on

snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall

population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. The change to methods and means would be a reduction in subsistence opportunity; if the board adopts this proposal, it may wish to determine if a reasonable opportunity for subsistence is still provided.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 115 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the resident only winter sheep hunt in Unit 19C.

PROPOSED BY: Jeff Pralle

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C winter sheep hunt for residents (RS380).

WHAT ARE THE CURRENT REGULATIONS? The board did not close the Unit 19C winter sheep hunt for residents, and it is currently open.

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

RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted there would be no change because the winter hunt RS380 was never closed by the board.

BACKGROUND: In March 2023 the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting will reopen in regulatory year (RY) 28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from Aug 10–Sept 20; and a winter registration permit hunt (RS380) for residents only with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken during Oct 1 – Apr 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal, however the board may wish to take no action as the RS380 winter hunt was never closed.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 116 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Reopen the resident only winter sheep hunt in Unit 19C.

PROPOSED BY: Spencer Pape

WHAT WOULD THE PROPOSAL DO? This proposal would reopen the Unit 19C winter sheep hunt for residents (RS380).

WHAT ARE THE CURRENT REGULATIONS? The board did not close the Unit 19C winter sheep hunt for residents, and it is currently open.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory		

years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted there would be no change because the winter hunt RS380 was never closed by the board.

BACKGROUND: In March 2023 the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting will reopen in regulatory year (RY) 28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from Aug 10–Sept 20; and a winter registration permit hunt (RS380) for residents only with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken during Oct 1 – Apr 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal, however the board may wish to take no action as the RS380 winter hunt was never closed.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 117 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Adopt the management plan recommendations created by the Unit 19C Sheep Working Group.

PROPOSED BY: Alaska Professional Hunters Association

WHAT WOULD THE PROPOSAL DO? This proposal would modify sheep hunting regulations in Unit 19C for all user groups according to the recommendations from the Unit 19C sheep working group, which have not yet been formulated.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted the proponent would like to see the recommendations of the Unit 19C sheep working group adopted by the board into regulation.

BACKGROUND: In March 2023 the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a 5-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a 5-year period. The youth hunt and nonresident hunting will reopen in RY28. At this meeting the board also expressed their desire to establish a working group charged with developing a management plan to address sheep management and allocation in Unit 19C. The results of the working group are not final at this time.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from Aug 10–Sept 20; and a winter registration permit hunt (RS380) for residents only with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken during Oct 1 – Apr 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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This proposal was deferred to the Statewide meeting from the March 2024 Interior and Northeast Arctic Region to allow the Unit 19C sheep working group time to meet and form recommendations for the board to consider.

PROPOSAL 118 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Close all nonresident sheep hunting in Unit 19.

PROPOSED BY: Chris Bouch

WHAT WOULD THE PROPOSAL DO? This proposal would close all nonresident sheep hunting in Unit 19.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(A), 19(B) and 19(D)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	Aug 1 – Aug 5	
1 ram with full-curl horn or larger; or	Aug 10 – Sept 20	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		Aug 1 – Aug 5
1 ram with full-curl horn or larger, every 4 regulatory years		Aug 10 – Sept 20
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an Amount Reasonably Necessary for Subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted nonresidents would be unable to hunt sheep in any portion of Unit 19.

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt and the nonresident hunt for a five-year period. The youth hunt and nonresident hunting season will reopen in RY28.

Unit 19C currently has two sheep hunts: a general season for residents with full-curl horn bag limit from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. From 2010 through 2019, sheep abundance has been variable, but relatively stable. During the survey in 2023 the department observed 62% fewer sheep than the average of all surveys from 2010 – 2019. The most significant declines were in the eastern portion of the unit where there were 90% fewer sheep than the average from 2010 – 2019. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but higher number of lambs were observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade with both resident and non-resident hunting opportunities, RY13–RY22, residents composed 49% of all sheep hunters in Unit 19C with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, there were 56 nonresident hunters compared to a high of 109 nonresident hunters in 2018. In RY22 there were 38 resident hunters compared to a high of 109 resident hunters in 2018. In RY23, the first year of resident-only hunting, there were 50 hunters. Data for the number of resident hunters in RY24 are unavailable at this time.

Over the 10-year period when hunting was open to nonresidents (RY13–RY22), an average of 85 sheep were harvested per year with nonresidents accounting for 68% of all sheep harvested compared to 32% for residents. Success rates averaged 33% for residents and 68% for nonresidents with an overall average success rate of 50%. In RY22 nonresidents harvested 26 sheep compared to a high of 81 harvested by nonresidents in 2018. In RY22 there were three

sheep harvested by residents compared to a high of 46 harvested by residents in RY17. In RY23 residents harvested 5 sheep and preliminary data in RY24 suggests residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when 120 sheep were harvested. Since RY18, harvest has subsequently decreased, to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest, similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older, and previous research has shown these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to females. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. Unit 19C is currently closed but will reopen in RY28. If adopted, this proposal would permanently close all of Unit 19 to nonresident sheep hunters, however sheep are only located in Units 19B and 19C.

The Unit 19C sheep working group developed recommendations for the board to consider which are found in Proposal 190.

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

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PROPOSAL 119 – 5 AAC 92.450. Description of game management units. Change the boundary between Units 21E and 21D.

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

WHAT WOULD THE PROPOSAL DO? This proposal will increase the size of Unit 21E and decrease the size of Unit 21D. Moose regulations will change for the moose populations encompassed by this boundary change, and additional proposals may be required to adapt the regulations to the desired management strategies for the new boundaries. In addition to moose hunting regulations, three other big game species will be affected by this proposal: a small reduction in caribou hunting opportunity where the Unit 21D regulation is more liberal, a small reduction of the muskox hunt area of Unit 21D, an increase in winter moose hunting in the Unit 21E expansion, and a small increase in the grizzly bear season opportunity associated with the Unit 21E expansion. No other hunting or trapping regulations for any other species are affected by this boundary change.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.450

…

(21) Game Management Unit 21 consists of drainages into the Yukon River and Arhymot Lake 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 south along the northern and western bank of Arhymot Lake to the outlet at Crooked Creek (locally known as Johnson River) drainage then to, but not including, the Tozitna River drainage on the north bank, and to but not including the Tanana River drainage on the south bank, and excluding the Koyukuk River drainage upstream from the Dulbi River drainage;

(A) Unit 21(A) consists of that portion of Unit 21 in the Innoko River drainage upstream from and including the Iditarod River drainage;

(B) Unit 21(B) consists of that portion of Unit 21 in the Yukon River drainage upstream from Ruby and east of the Ruby-Poorman Road, downstream from and excluding the Tozitna River and Tanana River drainages, and excluding the Melozitna River drainage upstream from Grayling Creek;

(C) Unit 21(C) consists of that portion of Unit 21 in the Melozitna River drainage upstream from Grayling Creek, and the Dulbi River drainage upstream from and including the Cottonwood Creek drainage;

(D) Unit 21(D) consists of that portion of Unit 21 in the Yukon River drainage from and including the Blackburn Creek drainage upstream to Ruby, including the area west of the Ruby-Poorman Road, excluding the Koyukuk River drainage upstream from the Dulbi River drainage, and excluding the Dulbi River drainage upstream from Cottonwood Creek;

(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, but not including, the Blackburn Creek drainage, and the Innoko River drainage downstream from the Iditarod River drainage;
…

There are positive customary and traditional use (C&T) findings for all species in these units with the exception of muskox, which have a negative C&T finding.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal will redefine the Unit 21D and 21E moose population boundaries, however it will not change the functional populations. If the boundary change is adopted, the most substantial effect would be to moose regulations, because 21E regulations would be applied to the area formerly part of 21D. Consequently, the established management strategies for a portion of the 21D moose population would automatically change to 21E strategies. The department would need to reconsider management strategies for the affected areas and would need to recalculate Intensive Management Population and Harvest Objectives for the new unit boundaries. The current regulations were developed by the department after considerable planning efforts with stakeholders and adopted by the board as the appropriate management strategy for the moose populations in Units 21D and 21E as they currently exist. The board may want to consider whether the existing regulations should be retained for the moose populations occurring in the affected area, if they adopt a boundary change. Of course, if that course of action was taken by the board, it would not accomplish the stated intent of the proponent. Because the proponent explicitly stated the proposal's intent is to effect a change in seasons, bag limits, and hunt conditions in the area, the board may want to consider whether a boundary change to achieve a regulation (seasons and bag limits/hunt condition) change is the appropriate process for achieving that outcome. The board may want to consider if the effect of this proposal would be best considered at a regional meeting so that adequate comments can be considered.

BACKGROUND: There are two hunt options for hunters in the Unit 21D portion of the area where this regulation change would occur, the RM834 subsistence registration permit and the DM818 drawing permit. The RM834 permit was adopted by the board in 2004 and the DM818 permit was adopted in 2006. The RM834 permit requires antler destruction among the hunt conditions and is required in all 21D except the Koyukuk Controlled Use area portion of 21D. The DM818 permit, the "Papa Willie Creek" hunt area portion of 21D, is available to residents and non-residents but has been limited to 25 permits since it was initiated in 2006.

Moose telemetry studies conducted in 21D and 21E demonstrated minimal movement across the existing boundary. In the 2016 21E study, only 1.2% of relocations crossed into 21D, despite 21E moose being collared immediately adjacent to the 21D/21E boundary (Figure 1). Topography at the existing 21D/21E boundary creates a natural break between these two populations. None of the moose collared in a 2008-10 21D Kaiyuh Flats area study traveled into 21E. The existing boundary for 21D and 21E accurately defines the key game population (moose in this area), which is the primary function of GMU boundaries.

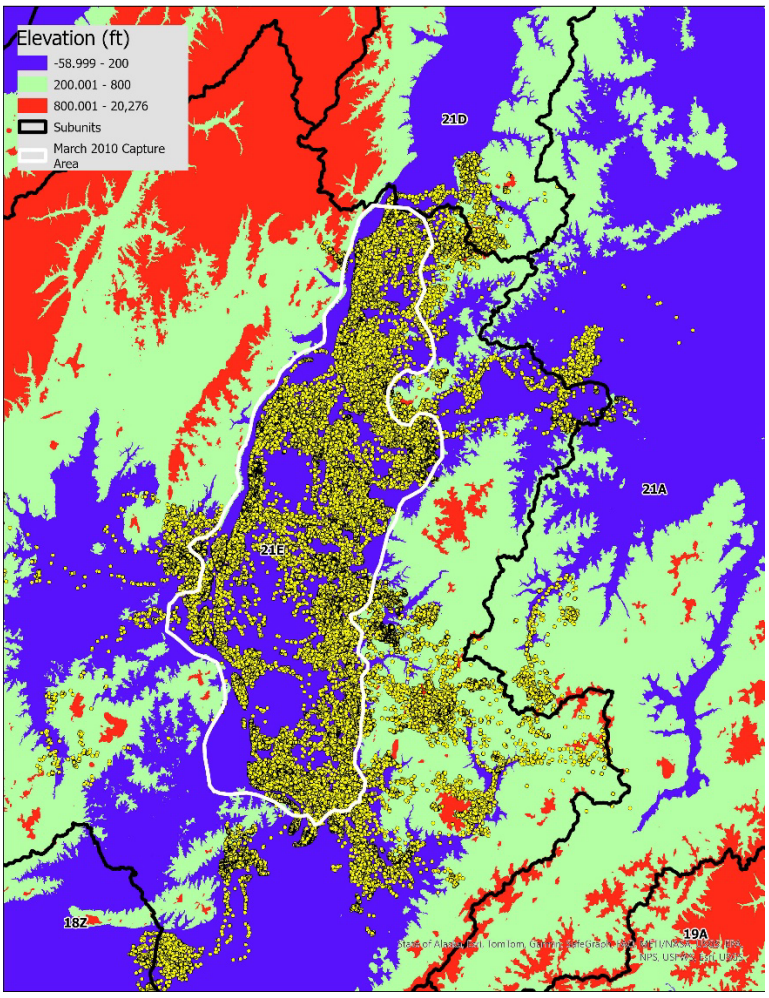

Figure 1. Moose relocations of the 2010-14 moose telemetry study in Unit 21E, (Paragi et al., 2017, Alaska Dept. of Fish and Game).

Historical use patterns by local resident hunters are similarly separated by the boundary. From 2002-2024, Kaltag and Nulato residents acquired 2,091 permits (99.0%) for 21D hunts, compared to 21 permits (1.0%) for 21E hunts (Table 1). During the same period, GASH residents acquired 1,261 permits (99.1%) for 21E hunts, compared to 11 permits (0.9%) for 21D hunts. The 2014 Division of Subsistence Technical Paper 396 also documented very limited use of Unit 21D by the people from the villages of Anvik or Grayling (Figure 2). The existing boundary accurately reflects historical hunter-use patterns, which is the secondary function of a GMU boundary. Permits for both areas are readily available online throughout the season.

Table 1. Moose permits acquired by villages in Units 21D and 21E from RY02-RY24.

2002 – 2024 Permits Acquired by Village			
	RM834/DM818 (21D Hunts)	RM836/RM837 (21E Hunts)	Total
Kaltag	474	3	
Nulato	1617	18	
Sub-Total	2091 (99%)	21 (1.0%)	2112
Grayling	4	441	
Anvik	5	271	
Shageluk	2	140	
Holy Cross	0	409	
Sub-Total	11 (0.9%)	1261 (99.1%)	1272

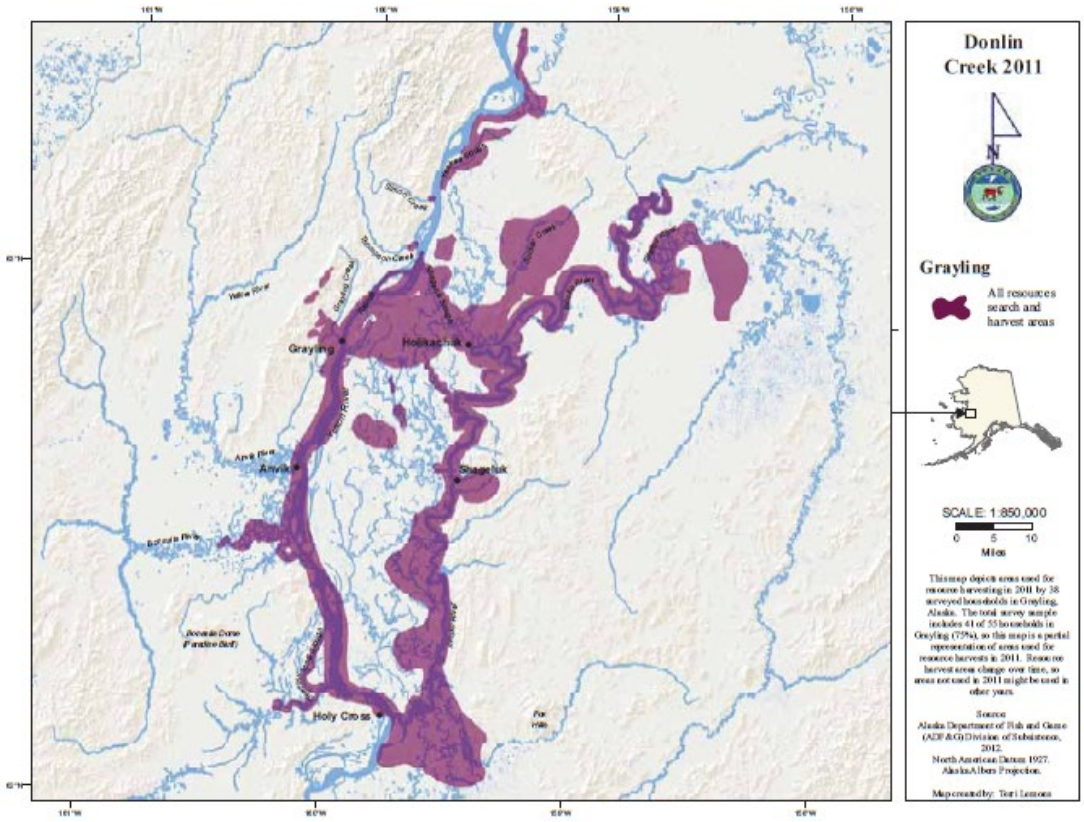

Figure 2. All resources search and harvest areas, Grayling, 2011 (Ikuta et al., 2014, Div. of Subsistence, Technical Paper No. 396)

DEPARTMENT COMMENTS: The department opposes redefining the moose populations for Units 21D and 21E because the current boundary accurately define the moose populations, and therefore **OPPOSES** the proposed boundary change. The existing boundary for Units 21D and 21E accurately defines the moose population, which is the primary function of the boundary in this area. The existing boundary also accurately describes hunter-use patterns, which is the secondary function of a boundary. This proposal intends to effect a change to seasons and bag limits (i.e. hunts/hunt conditions), and the department recommends that season or bag limit proposals should be considered at the appropriate regional meeting, rather than indirectly as boundary change proposals at a statewide meeting. The department also supports the current management strategies that apply to the moose population in Unit 21D as delineated by the current boundary. As noted above, this proposal, if adopted, may increase subsistence opportunity for some harvesting activities and reduce others. As such, the board may wish to consider if reasonable opportunity is still provided for these various subsistence opportunities.

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

****

PROPOSAL 120 – 5 AAC 92.450. Description of game management units. Change the boundary between Units 25C and 25D.

PROPOSED BY: Amanda Pope

WHAT WOULD THE PROPOSAL DO? The proposal would change a small portion of the Unit 25C/25D boundary, and would align the boundary with the Steese Highway.

WHAT ARE THE CURRENT REGULATIONS?

Unit descriptions:

25C – Unit 25(C) consists of that portion of Unit 25 in drainages into the south bank of the Yukon River upstream from Circle to the Subunit 20(E) boundary, the Birch Creek drainage upstream from the Steese Highway bridge (milepost 147), 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. The total area is 5,142 mi^2.

25D – Unit 25(D) consists of the remainder of Unit 25. The total area is 17,463 mi^2.

Unit 25C is located entirely within the Fairbanks Nonsusbsistence Area, and 25D has positive customary and traditional use (C&T) findings for all species in the area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Unit descriptions

25C – Unit 25(C) consists of that portion of Unit 25 in drainages into the south bank of the Yukon River upstream from Circle to the Subunit 20(E) boundary, the Birch Creek drainage upstream from the Steese Highway bridge (milepost 147) *and south of the Steese Highway from the Birch creek bridge (milepost 147) to where the Steese Highway intersects the Yukon river at 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. The total area would decrease by 5 mi^2 to 5,137 mi^2.

25D – Unit 25(D) consists of the remainder of Unit 25. The total area would increase by 5 mi^2 to 17,468 mi^2.

The proposed boundary change would occur between the bridge at Birch creek and where the Steese Highway meets the Yukon River at Circle. Figure 1 below depicts this area including the old GMU boundary and the Steese Highway as the proposed boundary. Overall, this proposed change would eliminate 5 mi^2 of GMU 25C and add 5 mi^2 to GMU 25D.

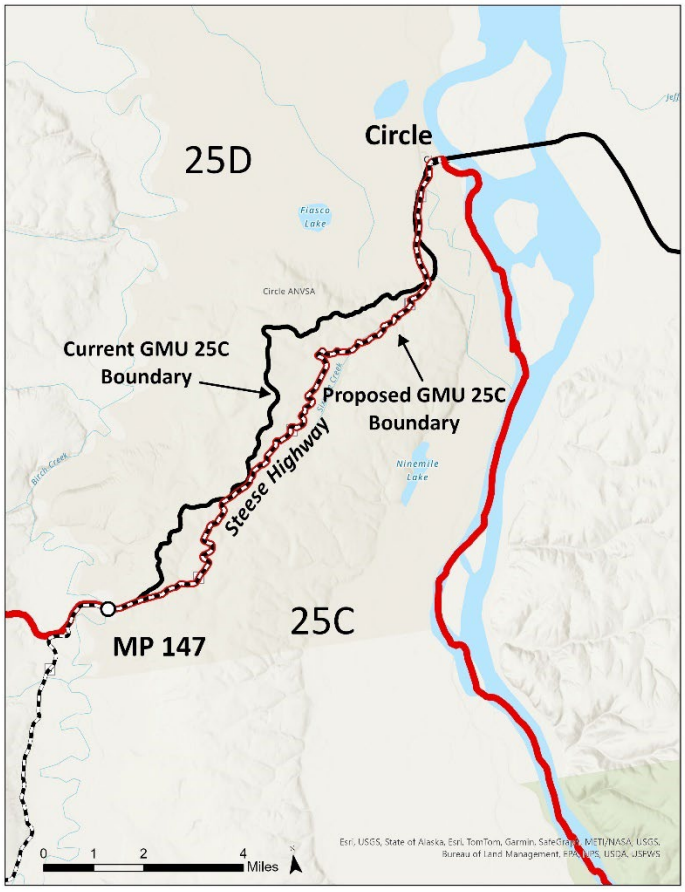

Figure 1. Map showing current and proposed boundary of GMU 25C and 25D between Birch Creek and the Yukon River.

Caribou, moose, brown bear, and ptarmigan hunting regulations are slightly different between the two units, but all other regulations are identical. These similarities and differences are highlighted in Table 1. Hunting along the road in this area is limited because the area is almost all private land.

Table 1. Hunting regulation differences between GMU 25C and 25D in the area of proposed change.

Hunting regulations

species	residence	25C		25D	
		bag limit	season length	bag limit	season length
Black bear	both	no differences			
Brown bear	resident	one bear	Sept 1-June 15	two bears	July 1-Nov 30, Mar 1-June 30
	nonresident			one bear	Sept 1-Nov 30, Mar 1-June 15
Caribou	resident (youth)	one caribou	TBA (40 mile herd)		
	resident	one caribou	TBA (40 mile herd)	ten bulls	July 1-Apr 30
	nonresident	one bull	TBA (40 mile herd)	two bulls	Aug 1-Sept 30
Moose	resident	one bull	Sept 1-Sept 15	one bull	Sept 10-Sept 20, Feb 18-Feb 28
	nonresident	one bull (S/F/50)	Sept 5-Sept 15	One bull (S/F/50)	Sept 10-Sept 20
Sheep	both	no differences			
Wolf	both	no differences			
Wolverine	both	no differences			
Fur animals	both	no differences			
Ptarmigan	both	20 per day	Aug 10-Feb 28	20 per day	Aug 10-Apr 30
		5 per day	Mar 1-Apr 30		
Grouse	both	no differences			
Hare	both	no differences			
Unclassified	both	no differences			

Only the wolverine trapping regulations are different between Units 25C and 25D (Table 2). There is a one month longer season for trapping wolverine in Unit 25D. All other trapping seasons and bag limits are identical between the two units.

Table 2. Trapping regulation differences between Units 25C and 25D in the area of proposed change.

Trapping regulations

species	25C	25D
	season length	season length
Beaver	no differences	
coyote	no differences	
Arctic fox	no differences	
Red fox	no differences	
Lynx	no differences	
Marten	no differences	
Mink and Weasel	no differences	
Muskrat	no differences	
River Otter	no differences	
Squirrel and Marmot	no differences	
Wolf	no differences	
Wolverine	Nov 1-Last day of Feb.	Nov 1-Mar 30

BACKGROUND: The Steese Highway between Birch Creek and Circle meanders back and forth across terrain that creates some confusion about which unit the road is in at some points. Most of the hunting seasons, trapping seasons and bag limits are similar between 25C and 25D but there are a few differences that have been outlined above. If the proposal is adopted, the north side of the road will be in Unit 25D and the south side will be in Unit 25C from the Birch Creek bridge at milepost 147 to the Yukon River at milepost 161.

Using a road to define a unit boundary is unique and may pose challenges if the road is moved.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The resulting change will eliminate some confusion about which unit a hunter or trapper is driving through by making the Steese Highway the boundary in this area. This proposal does not create nor address any biological concerns.

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

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PROPOSAL 121 – 5 AAC 92.450. Description of Game Management Units. Split Unit 15C into two subunits.

PROPOSED BY: N.J. Hillstrand

WHAT WOULD THE PROPOSAL DO? The proposal would divide game management Subunit 15C into two subunits where that portion of Unit 15C south of Kachemak Bay, Sheep Creek, and Dinglestat Glacier would become the new Unit 15D.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.450. Description of game management units.

…

(15) Game Management Unit 15 consists of that portion of the Kenai Peninsula and adjacent islands draining into the Gulf of Alaska, Cook Inlet, and Turnagain Arm from Gore Point to the point where longitude line 150° 00' W. crosses the coastline of Chickaloon Bay in Turnagain Arm, including Kalgin Island, and including that area lying west of longitude line 150° 00' W. to the mouth of the Russian River, thence southerly along the Chugach National Forest boundary to the upper end of Upper Russian Lake; and including the drainages into Upper Russian Lake west of the Chugach National Forest boundary, and all seaward waters and lands within three miles of these coastlines;

(A) Unit 15(A) consists of that portion of Unit 15 north of the north bank of the Kenai River and the north shore of Skilak Lake;

(B) Unit 15(B) consists of that portion of Unit 15 south of the north bank of the Kenai River and the north shore of Skilak Lake, and north of the north bank of the Kasilof River, the north shore of Tustumena Lake, Glacier Creek, and Tustumena Glacier, and Kalgin Island;

(C) Unit 15(C) consists of the remainder of Unit 15;

…

Moose in Unit 15C are also identified for intensive management of identified big game prey populations (5AAC 92.106) with population and harvest objectives of 2,500–3,500 and 200–350, respectively.

Outside of the Anchorage-Matsu-Kenai nonsubsistence area (NSA), there are positive findings for the customary and traditional use of black bears, moose, and furbearers. The amount reasonably necessary for subsistence uses (ANS) for black bears is 20–60, 5–6 moose, and 90 percent of the harvestable portion of furbearers (5 AAC 99.025) (Figure 1). Adoption of this proposal would encompass the Subunit 15C lands outside of the Anchorage-Matsu-Kenai NSA in the proposed Subunit 15D (Figure 2).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would divide Subunit 15C into two separate subunits consisting of 15C and 15D, which would encompass that portion of Game Management Unit 15 south of Kachemak Bay, Sheep Creek, and Dinglestat Glacier. This described area would result in a land surface area of 2,743.72 square miles in Subunit 15C and 997.38 square miles in Unit 15D. If adopted, this would create the 3rd smallest land surface area of any game management unit or subunit in Alaska. The difference in land surface area between the current language delineation in Unit 15C (red in Figure 1) and the proposed area of Unit 15D (dark red in Figure 2) would be 103.77 square miles.

BACKGROUND: Existing regulations treat the different geographical portions of Unit 15C differently where appropriate. The proposal describes subdividing Subunit 15C and creating a new Unit 15D south of Kachemak Bay, Sheep Creek, and Dinglestat Glacier (Figure 2). Delineation of Unit 15 into Units 15A, 15B, and 15C for some regulations occurred as early as regulatory year 1970 (Figure 1). Beginning in regulatory year 2011, language was adopted which altered non-resident and resident bag limits for black bear to 1 and 3, respectively, south of Bradley River, Bradley Lake, and Kachemak Creek in Unit 15C (5AAC 99.015). Broadly, this area encompasses what is also described as the Subunit 15C portion of the Kachemak Peninsula (Figure 2). This boundary is roughly consistent with the proximal boundary of a Uniform Coding Unit which the Alaska Department of Fish and Game uses to identify areas of harvest for some big game species. This allows for potential comparison of harvest occurring on the mainland portion of Unit 15C and that area south of Bradley River, Bradley Lake, and Kachemak Creek. Language describing further delineation of Unit 15C for certain hunts (e.g., TM549 – Tier II moose hunt and certain drawing and registration goat hunts) also exists.

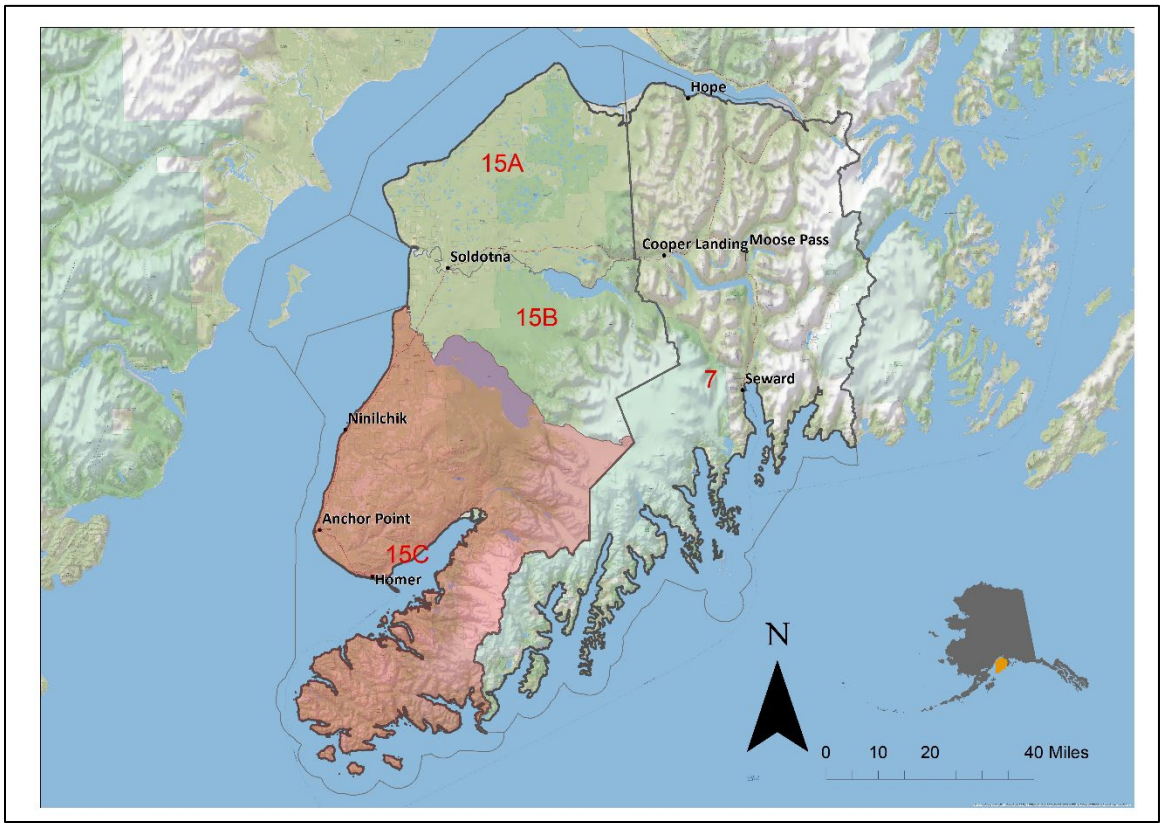

Figure 1. Map identifying the Kenai Peninsula and Subunits 15A, 15B, 15C, and Unit 7. Game Management Unit 15C highlighted in red.

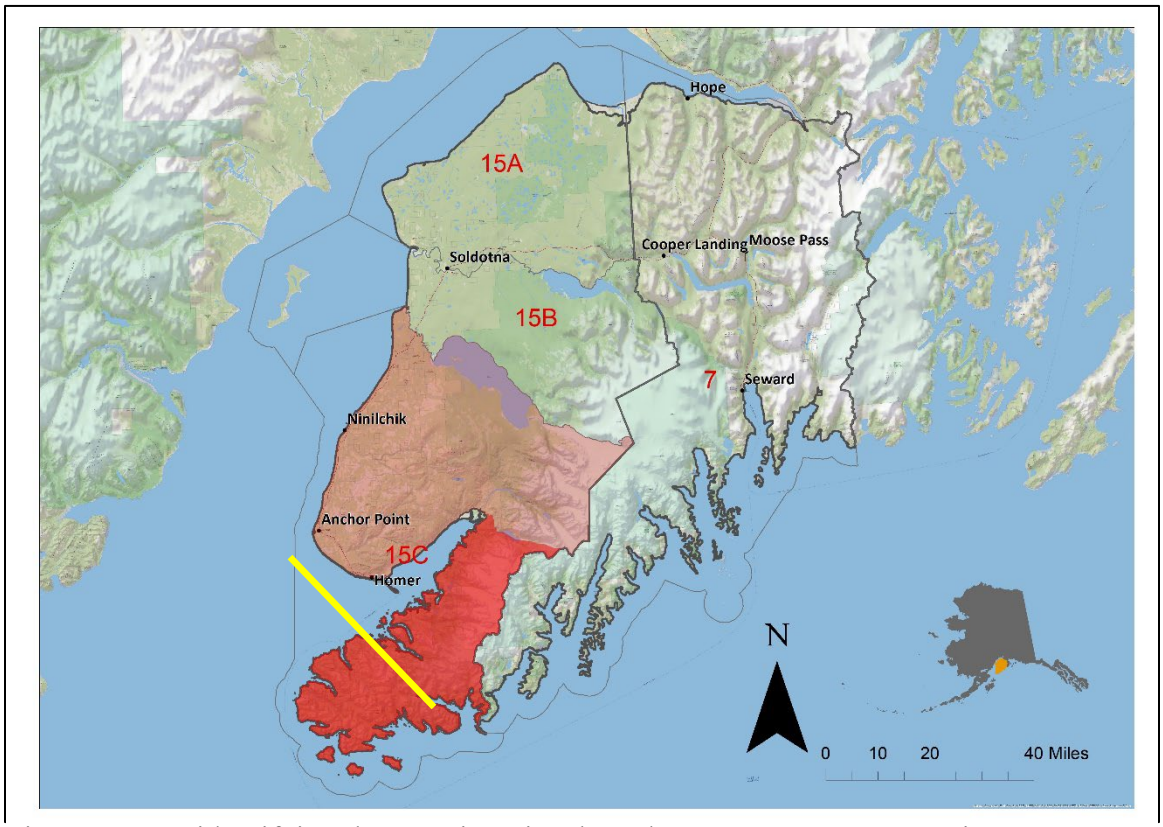

Figure 2. Map identifying the Kenai Peninsula and Game Management Units 15A, 15B, 15C, and Unit 7. Game Management Subunit 15C is highlighted in light red with that area south of Bradley River, Bradley Lake, and Kachemak Creek highlighted in darker red. The yellow line represents the approximate boundary of the Anchorage-Matsu-Kenai NSA with lands south of that line being outside of the NSA.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to split Unit 15C into two subunits and is unaware of difficulties managing the existing Unit 15C. This proposed change is unnecessary from a management perspective and could cause initial confusion among hunters and trappers as new maps and materials are produced.

The proposal does not describe changes to hunting, trapping, or waterfowl regulation. If adopted, hunting regulations would need to be established for the new Unit 15D; alternatively, the existing regulations would be applied to the new Unit 15D, for a net change of zero. Presently, trapping and waterfowl regulations do not delineate between subunits in Unit 15.

Adoption of this proposal could merit re-evaluation of intensive management objectives.

Regulatory language already adopted for differentiating non-resident and resident black bear bag limits in Unit 15C nearly matches the proposed area for Unit 15D excepting 103.77 square miles

(5AAC 99.015). Therefore, this provides the board the ability to set applicable regulation on the Kachemak Peninsula in Unit 15C separately from the remainder using established regulatory language. Effectively, this allows for independent regulatory treatment of the Kachemak Peninsula portion of Unit 15C and the remainder without establishment of a new subunit.

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

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PROPOSAL 122 – 5 AAC 92.011. Taking of game by proxy. Allow proxy hunting for plains bison statewide as follows:

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would allow Alaska residents to proxy hunt on behalf of other qualified Alaska residents for all plains bison hunts statewide.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.011. Taking of game by proxy.

…

(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 in Units 12, 19, and 20.

Only residents are allowed to proxy hunt, and the beneficiary must be a resident as well. To be eligible for proxy hunting, the beneficiary must be blind, 70% or greater physically disabled, 65 years of age or older, or be developmentally disabled. Both beneficiary and proxy must have obtained licenses, regardless of age, and any necessary harvest tickets and/or permits before obtaining a Proxy Hunting Authorization form. Additional proxy hunting details can be found in the current Alaska hunting regulations book.

Antler destruction is currently required in all proxy hunts and consists of removing at least one antler from the skull plate, or cutting the skull plate in half to destroy the trophy value. It is required for all antlered species and is required for each animal taken by the proxy hunter (both the proxy hunter's animals the beneficiary's animals), and must occur at the kill site. However, when the board adopted Proposal 47 at the Interior and Northeast Arctic Region meeting in

Fairbanks in March of 2024, the board discussed requiring trophy destruction for bison and chose not to require it.

A resident who is awarded a drawing permit for bison is ineligible to apply for 10 years, and a nonresident is awarded a drawing permit for bison can only win one per lifetime.

There is a negative customary and traditional use finding for bison in Units 11, 19(D), and 20(D) (5 AAC 99.025(a)(1)) and all bison hunting opportunity is done by drawing permit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, there would be consistency statewide among the regulations regarding which plains bison herds can and cannot be proxy hunted, which would reduce confusion for hunters.

BACKGROUND: 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 proposes the board 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, and only when a harvestable surplus exists.

All plains bison herd hunting is done by drawing permit only, and as a result all harvest is restricted at a rate the department controls by issuing those permits. Herds are also managed by issuing both bull and cow drawing hunt permits to control abundance, and habitat manipulation to provide forage and reduce human/bison conflict. Existing statutes and regulations allow a resident hunter (the proxy) with a valid resident hunting license to take specified game for another resident (the beneficiary) who is blind, physically or developmentally disabled, or 65 years of age or older, as authorized by AS 16.05.405 and 5 AAC 92.011.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to allow proxy hunting for all bison drawing permit hunts for consistency in the regulations. Because the number of bison taken annually is controlled by the number of permits issued, the department does not expect adoption of this proposal to result in a conservation concern.

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

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PROPOSAL 123 – 5 AAC 92.011. Taking of big game by proxy. Allow remuneration for proxy hunting as follows:

PROPOSED BY: Alissa Nadine Rogers

WHAT WOULD THE PROPOSAL DO? The proposal would allow persons to give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.011. Taking of game by proxy.

(a) A resident hunter (the proxy) holding a valid resident hunting license may take specified game for another resident (the beneficiary) who is blind, physically or developmentally disabled, or 65 years of age or older, as authorized by AS 16.05.405 and this section.

...

(d) A person may not be a proxy

(1) for more than one beneficiary at a time;

(2) more than once per season per species in Unit 13;

(3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee;

(4) for more than one person per regulatory year for moose in Units 20(A) and 20(B);

(5) more than once per person per regulatory year for Fortymile and White Mountains caribou registration hunts in Units 20(B), 20(D), 20(E), 20(F), and 25(C).

...

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

(j) A proxy participating in a proxy hunt must remove at least one antler from the skull plate or cut the skull plate in half, on an antlered animal, for both the proxy's animal and the beneficiary's animal before leaving the kill site, unless the department has established a requirement that complete antlers and skull plates must be submitted to the department.

(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; and

(4) emperor geese;

(5) muskoxen in Tier II hunts; and

(6) plains bison in Units 12, 19, and 20.

(l) Notwithstanding (k) of this section, proxy hunting is prohibited in the following hunts where the board has determined that the use of the proxy would allow circumvention of harvest restrictions specified by the board, or where the board has otherwise directed:

(1) Unit 20(E) moose registration hunts;

(2) Units 21(B), 21(C), 21(D), and 24 moose hunts if either the proxy or the beneficiary holds a drawing permit for Units 21(B), 21(C), 21(D), or 24 moose hunts;

(3) Units 9(A) and 9(B), Unit 9(C), that portion within the Alagnak River drainage, and Units 17(B), 17(C), 18, 19(A), 19(B) and 19(E) caribou hunts from August 1 through October 31;

(4) Unit 5(A) deer hunts from October 15 through October 31;

(5) Unit 20(D), within the Delta Junction Management Area, the moose drawing hunt for qualified disabled veterans.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, people would be able to pay other persons to proxy hunt for them, to pay someone to grant another to proxy for them, and to influence someone to allow another to proxy hunt for them. There is no way to know how much money would need to change hands, how often it would occur, and what the result would be regarding persons paying in any manner related to proxy hunting.

BACKGROUND: The regulation prohibiting the giving or receiving of remuneration to obtain, grant, or influence the granting of a proxy has been in effect since at least 1993.

The number of proxy authorizations issued by the department has fluctuated between 557 and 1,658 over the last ten years (Figure 123-1.) In 2022 and 2023 there were no Nelchina caribou hunts, which explains why the number of proxy authorizations issued those years is considerably lower than in previous years.

Year	Proxy Authorizations
2014	1088
2015	1267
2016	1658
2017	1558
2018	1271
2019	1379
2020	1405
2021	1134
2022	1039
2023	575
2024*	557

*Preliminary data for 2024

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because there are no conservation concerns, and adoption of the proposal would likely result in little to no

additional harvest. The department is unaware of persons currently unable to proxy hunt for, or to find someone, to proxy hunt for them because of this existing regulation.

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

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PROPOSAL 124 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Change "permanent dwelling" to "permanent domicile" and rely on the statutory definition of "domicile" for the purposes of bear baiting, as follows:

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? This proposal would change "dwelling" to "domicile" and would rely on the statutory definition of "domicile" found in AS 16.05.940.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 5 AAC 92.044. Permit for hunting bear with the use of bait or a scent lure.

(b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:
…
(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;
…
(d) In this section, "operate" means to establish, register, bait, maintain, or hunt a bait station site.
(e) In this section, "equipment" means barrels, tree stands, game camera, and other items associated with a bear bait station. Tree stands may be left in the field year-round with permission of the landowner or such other person authorized to give permission.

AS 16.05.940(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;

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effect of changing this regulation will be to create additional confusion within 5 AAC 92.044(b)(5)(i).

The existing regulation states that bait and scent lures may not be used within one mile of a 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…The adjective "permanent" modifies the word "dwelling" and there is no reference to period of occupancy or intent to return to the structure, and as currently written applies to seasonally occupied cabins.

BACKGROUND: If the board had intended to exempt seasonally occupied cabins from the one-mile restriction, the regulation would have read "permanently occupied dwellings" or would have used the definition of "domicile" found in statutes. As currently written the regulation applies to the permanent structure. Many homes in Alaska consist of structures not permanently fixed in place, such as mobile homes, campers, yurts, and other structures that individuals reside in year-round or on a seasonal basis, so using the phrase "permanent domicile" may also be problematic.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on changing "permanent dwelling" to "permanent domicile", and if the board intends to change 5 AAC 92.044(5)(i) the department recommends the board consider all of (i) and not create additional confusion in its desire to solve a problem. The department appreciates using terms that already exist in statute for ease of enforcement and consistency and simplicity for the public.

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

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PROPOSAL 125 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Define "developed recreational facility and "permanent dwelling" for the purposes of bear baiting, as follows:

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? This proposal would require the Board of Game to define a "developed recreation facility" as a state-maintained, multiuse area that provides services for shooting, launching of watercraft, or camping, that also includes signage and buildings that are regularly maintained for the purpose of recreation; and to define "permanent dwelling" as a structure permanently fixed in place, and legally owned by the public or a private individual, and occupied for a minimum of 30 days per year.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 5 AAC 92.044. Permit for hunting bear with the use of bait or a scent lure.

(b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:
…

(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;

…

(d) In this section, "operate" means to establish, register, bait, maintain, or hunt a bait station site.

(e) In this section, "equipment" means barrels, tree stands, game camera, and other items associated with a bear bait station. Tree stands may be left in the field year-round with permission of the landowner or such other person authorized to give permission.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide a definition as defined above for a developed recreational facility and permanent dwelling as they relate to bear baiting, the goal of which is less ambiguity for the public. The existing regulation states that bait and scent lures may not be used within one mile of a 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…The adjective "permanent" modifies the word "dwelling" and there is no reference to period of occupancy or intent to return to the structure, and as currently written applies to seasonally occupied cabins.

BACKGROUND: The proposed definitions for "developed recreation facility" and "permanent dwelling" would likely be problematic for the current intent of the regulation, which is to separate bear bait sites from other activities to prevent negative nonhunter/bear interactions. Many "developed recreation facilities" are not state maintained. Some examples include the Kachemak Nordic Ski Club facilities and trails, the Diamond Creek Recreation Area, and Tsalteshi Recreation Area, all located on the Kenai Peninsula. The proposed definition for a "permanent dwelling" would also be problematic. Many homes also consist of structures not permanently fixed in place, such as mobile homes, campers, yurts, and other structures that individuals reside in year-round or on a seasonal basis. Furthermore, the department does not have reliable, high-resolution data on the placement of bait stations relative to the structures listed in 5 AAC 92.044(b)(5), and it does not have high-resolution data on the existing permanent dwellings.

The Department of Natural Resources Administrative Code 11 AAC 12.990 defines "developed facility" as

(11) "developed facility"

(A) includes a building, boat ramp, campground, picnic area, rest area, visitor information center, swim beach, trailhead, parking area, and developed ski area;

(B) does not include trails or latrines more than one quarter mile from a road;

However it may be important to note this definition does not include trails or permanent structures (latrines) that are more than one quarter mile from a road, so adopting this definition would conflict with existing restrictions found in 5 AAC 92.044.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding the definition of developed recreational facility and permanent dwelling, and if the board intends to define those terms the department recommends the board create definitions that are clear to enforce.

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

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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:

PROPOSED BY: Ted Spraker

WHAT WOULD THE PROPOSAL DO? The proposal would allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers with a trapping license statewide.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game area prohibited:

…

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow the use of electronically enhanced night vision and forward-looking infrared devices when trapping furbearers, statewide. It would align regulations statewide which will reduce confusion for trappers that take game in the Interior-Northeast Arctic and neighboring regions, and makes it easier for enforcement.

BACKGROUND: At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to

allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

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

****

PROPOSAL 127 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers as follows:

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The proposal would allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license during an open season November 1 - March 31 statewide.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game area prohibited:

…

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow the use of night vision goggles and forward-looking infrared devices when trapping furbearers, statewide. It would align regulations statewide which will reduce confusion for trappers that take game in the Interior-Northeast Arctic and neighboring regions, and makes it easier for enforcement.

BACKGROUND: At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal with amendments. As written the proposal will create conflicting regulations within 5 AAC 92.080. The department recommends the board amend the proposal to change the language from “night vision goggles” to “electronically enhanced night vision” and recommends the board amend the proposal to remove the dates allowing the use of these devices to match the language adopted by the board in March 2024.

While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal, with amendments, will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

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

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PROPOSAL 128 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. Allow the use of night vision and thermal optics for taking furbearers as follows:

PROPOSED BY: Don Coatney

WHAT WOULD THE PROPOSAL DO? The proposal would allow the use of night vision and thermal optics for taking furbearers with a trapping license during an open season statewide.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game area prohibited:

…

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C);

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow the use of night vision and thermal optics when trapping furbearers statewide. It would align regulations statewide which will reduce confusion for trappers that take game in the Interior-Northeast Arctic and neighboring regions and makes it easier for enforcement.

BACKGROUND: At the 2024 Interior-Northeast Arctic Region Board of Game (board) meeting the board adopted a proposal submitted by the Fairbanks Fish and Game Advisory Committee to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers in that region. The board amended it to clarify it was for electronically enhanced night vision, not just goggles. At the 2016 Statewide meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited.

The difference between electronically enhanced night vision and FLIR technology is that FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, and rifle scopes. Night vision goggles and FLIR devices provide a greater aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness. FLIRs are, by definition, thermal optical devices.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal with amendments to use the existing regulatory language to ease confusion which is the intent of the proposal. As written, the proposal will create conflicting regulations within 5 AAC 92.080. The department recommends the board amend the proposal to specify it allows the use of electronically enhanced night vision and forward-looking infrared devices to match the language adopted by the board in March 2024.

While this technology is not new, it has improved over time. The board adopted previous proposals to prohibit the use of night vision and FLIR devices because of concerns of increased harvest.

Adoption of the proposal, with amendments, will reduce confusion for trappers that take furbearers in both the Interior-Northeast Arctic Region and surrounding game management units. Simplification and standardization of the regulation will be easier for trappers to understand and apply.

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

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PROPOSAL 129 – 5 AAC 92.085. Unlawful methods of taking game; exceptions. Establish a minimum caliber for taking big game.

PROPOSED BY: Robert Hammond

WHAT WOULD THE PROPOSAL DO? 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 ARE THE CURRENT REGULATIONS?

5 AAC 92.085. Unlawful methods of taking game; exceptions.
The following methods and means of taking big game are prohibited:

(1) With the use of a firearm other than a shotgun, muzzleloader, or rifle or pistol using a center-firing cartridge

5 AAC 92.052. Discretionary permit hunt conditions and procedures. The department may apply any or all of the following additional conditions to a permit hunt, when necessary for management of the species hunted:

(10) a permittee may use only weapons and ammunition specified by the department. The department exercises its discretionary authority for this in the Delta bison hunts in Unit 20D, for that hunt, hunters using a rifle or handgun must ensure the firearm fire a minimum of a 175 grain bullet having a minimum of 2,800 ft/lb energy at the muzzle.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, hunters would need to use a centerfire rifle cartridge of .25 caliber or larger with a cartridge of at least two-inches in length to hunt big game.

Costs to hunters may increase, if hunters have to purchase new firearms to be in compliance with the new requirement.

BACKGROUND:

Here is a review of the firearm regulations for the Yukon Territory and those states who have elk and/or moose hunts.

- Colorado- Rifles using center-fire cartridges of .24 caliber or larger, having expanding bullets of at least seventy (70) grains in weight, except for elk and moose where the minimum bullet weight is eighty-five (85) grains, and with a rated impact energy one hundred (100) yards from the muzzle of at least one thousand (1000) foot pounds as determined by the manufacturer's rating.

- Idaho- In any hunt, including any-weapons seasons, it is unlawful to pursue or kill big game animals with: any rimfire rifle, rimfire handgun, or muzzleloading handgun.

- Montana- There is no rifle or handgun caliber limitation or magazine/round capacity restrictions for the taking of game animals.

- North Dakota- Centerfire rifles of .25 caliber or larger are legal for elk and moose.

- Oregon- The minimum centerfire caliber to hunt elk, bighorn sheep, and Rocky Mountain goat is .24 caliber.

- Washington- Big game, except cougar, must be hunted with a minimum of .24 caliber (6mm) centerfire rifle. Cougar may be hunted with .22 caliber centerfire rifle. Rimfire rifles are not legal for big game.

- Wyoming- When hunting bighorn sheep, elk, moose, mountain goat or black bear by the use of a firearm, a hunter shall use any center-fire firearm of at least .24 caliber and firing a cartridge of at least two inches in overall length and using an expanding point bullet.

- Yukon- It is against the law to hunt big game with a rifle caliber less than .24 caliber.

A similar proposal was submitted during the 2016 statewide board meeting proposing a minimum caliber requirement of .243 for hunting moose. The department commented that if a minimum caliber were adopted by the board, that the adoption should be for all big game species and not just moose. The proposal did not pass.

In 2018 an Agenda Change Request was submitted to the board requesting to change 5 AAC 92.085 Unlawful methods of taking big game; for hunting moose. The proponent asked the board to establish a minimum caliber of .243 for hunting moose in Unit 18. The ACR was not accepted.

At the Western Arctic/Western region board meeting in 2020 the board addressed two similar proposals to establish a minimum caliber for hunting moose. The board did not pass one proposal and took no action on the other based on action taken on the first.

As noted above, the current regulations state that big game can be harvested by any caliber firearm as long as it is a center-firing cartridge. The board has established standards for some weapons, and the department educates hunters on advantages and disadvantages of various legal weapons and calibers. The decision as to which legal caliber is used to harvest game is left to the individual hunter and their capabilities.

Reducing wounding loss is a primary consideration for the taking of big game in all areas of the state. Small caliber cartridges leave little room for error in shot placement to ensure lethal results and off-target shots are likely to result in wounding loss. Alternatively, those favoring the use of small cartridges explain that when small calibers are used correctly, they can be effective in taking big game, including moose, and small calibers allow younger hunters a greater opportunity to hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The board has differentiated between big game and small game and set weapon-specific standards accordingly.

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

****

PROPOSAL 130 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.
Establish a minimum caliber for taking moose.

PROPOSED BY: Bethel Fish & Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Establish a minimum standard of centerfire rifle cartridges for taking moose as follows:

Prohibit the take of moose with firearms smaller than a .243 caliber rifle.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.085. Unlawful methods of taking game; exceptions.
The following methods and means of taking big game are prohibited:

(2) With the use of a firearm other than a shotgun, muzzleloader, or rifle or pistol using a center-firing cartridge

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, hunters would need to use a centerfire rifle cartridge of .243 caliber or larger to hunt moose.

Costs to hunters may increase, if hunters have to purchase new firearms to be in compliance with the new requirement.

BACKGROUND:

Here is a review of the firearm regulations for the Yukon Territory and those states who have elk and/or moose hunts.

- Colorado- Rifles using center-fire cartridges of .24 caliber or larger, having expanding bullets of at least seventy (70) grains in weight, except for elk and moose where the minimum bullet weight is eighty-five (85) grains, and with a rated impact energy one hundred (100) yards from the muzzle of at least one thousand (1000) foot pounds as determined by the manufacturer's rating.

- Idaho- In any hunt, including any-weapons seasons, it is unlawful to pursue or kill big game animals with: any rimfire rifle, rimfire handgun, or muzzleloading handgun.

- Montana- There is no rifle or handgun caliber limitation or magazine/round capacity restrictions for the taking of game animals.

- North Dakota- Centerfire rifles of .25 caliber or larger are legal for elk and moose.

- Oregon- The minimum centerfire caliber to hunt elk, bighorn sheep, and Rocky Mountain goat is .24 caliber.

- Washington- Big game, except cougar, must be hunted with a minimum of .24 caliber (6mm) centerfire rifle. Cougar may be hunted with .22 caliber centerfire rifle. Rimfire rifles are not legal for big game.

- Wyoming- When hunting bighorn sheep, elk, moose, mountain goat or black bear by the use of a firearm, a hunter shall use any center-fire firearm of at least .24 caliber and firing a cartridge of at least two inches in overall length and using an expanding point bullet.

- Yukon- It is against the law to hunt big game with a rifle caliber less than .24 caliber.

A similar proposal was submitted during the 2016 statewide board meeting, proposing a minimum caliber requirement of .243 for hunting moose. The department commented that if a minimum caliber were adopted by the board, that the adoption should be for all big game species and not just moose. The proposal did not pass.

In 2018 an Agenda Change Request was submitted to the board requesting to change 5 AAC 92.085 Unlawful methods of taking big game; for hunting moose. The proponent asked the board to establish a minimum caliber of .243 for hunting moose in unit 18. The ACR was not accepted.

At the Western Arctic/Western region board meeting in 2020 the board addressed two similar proposals to establish a minimum caliber for hunting moose. The board did not pass one proposal and took no action on the other based on action taken on the first.

As noted above, the current regulations state that big game can be harvested by any caliber firearm as long as it is a center-firing cartridge. The board has established standards for some weapons, and the department educates hunters on advantages and disadvantages of various legal weapons and calibers. The decision as to which legal caliber is used to harvest game is left to the individual hunter and their capabilities.

Reducing wounding loss is a primary consideration for the taking of big game in all areas of the state. Small caliber cartridges leave little room for error in shot placement to ensure lethal results and off-target shots are likely to result in wounding loss. Alternatively, those favoring the use of small cartridges explain that when small calibers are used correctly, they can be effective in taking big game, including moose, and small calibers allow younger hunters a greater opportunity to hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The board has differentiated between big game and small game and set weapon-specific standards accordingly. The board differentiates between big game species when it comes to standards for archery equipment for example, however having different standards for big game species does introduce a level of complexity that may not be warranted.

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

****

PROPOSAL 131 – 5 AAC 92.095. Unlawful methods of taking furbearers. Require identification tags be attached to traps and snares.

PROPOSED BY: Kneeland Taylor

WHAT WOULD THE PROPOSAL DO? This proposal will require trappers to mark, with an ID tag, all traps and snares.

WHAT ARE THE CURRENT REGULATIONS? There are currently no trap marking requirements in Alaska.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will require additional effort for trappers to mark traps and snares, and may result in a nominal increase in expenses to refit traps and snares with ID tags. Adoption of this proposal will provide a method for the department and AWT to identify trappers, but members of the public have commented on concerns of trapper harassment if identifying tags are required.

BACKGROUND: The board previously adopted proposals to mark snares in Units 12 and 20E (2001) and all traps and snares in Units 1-5 (2003). The requirement to mark a snare was implemented in Regulatory Year (RY) 2001 for Unit 12 and 20E and in RY2003 for Units 1–5.

The requirement to mark a snare in Units 12 and 20E was originally enacted to address local enforcement issues related to snare sets left in the field following the closure of the wolf trapping season. The original proposal included a sunset clause of two years but was reinstated by the

board in 2002 without the sunset because of overall positive support from local trappers and law enforcement. Wolf trapping along major roadways is common in Units 12 and 20E. When these animals are caught in sight of the road, the marking requirement has allowed the department and troopers to contact trappers before public complaints escalate.

The board adopted the requirement for marking traps and snares in Units 1-5 to address many of the same issues as identified in Interior units.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal and recommends that during regularly scheduled regional board meetings the board address area-specific issues rather than on a statewide broadscale basis. Requiring traps and snares to be marked makes enforcement easier. In the past trappers have expressed concerns that by requiring trap tags is to invite additional scrutiny to trap/snare sets resulting in human presence and scent near the sets that could impact the chances of catching furbearers. Such a regulation as proposed may be unnecessary in most of the state, and may only be appropriate in specific areas with documented issues.

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

****

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.

PROPOSED BY: Rick Grant

WHAT WOULD THE PROPOSAL DO? The proposal would prohibit nonresidents from using snowmachines to approach and pursue wolves and wolverine in some areas.

WHAT ARE THE CURRENT REGULATIONS?

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

…

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

…

(B) motorized land vehicle may be used as follows:

(i) in Units 22, 23, and 26(A), a snowmachine may be used to position a caribou, wolf, or wolverine for harvest, and caribou, wolves, or wolverines may be shot from a stationary snowmachine;

(ii) notwithstanding any other provision in this section, in the wolf control implementation areas specified in 5 AAC 92.111 - 5 AAC 92.113, 5 AAC 92.118, and 5 AAC 92.121 - 5 AAC 92.124, a snowmachine may be used to position a hunter to select an individual wolf for harvest, and wolves may be shot from a stationary snowmachine;

…

(ix) a snowmachine may be used to approach and pursue wolves and wolverine; an approach and pursuit under this sub-paragraph is not harassment under (5) of this section but may not come in contact with a live animal;

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?
Nonresidents would not be able to use a snowmachine to approach and pursue wolves and wolverine except in the locations listed under 5 AAC 92.080(4)(B)(i) and (ii). This would result in nonresidents being able to use snowmachines for the take of wolves and wolverine in some places, but not all.

BACKGROUND: The board allows the use of snowmachines to position hunters and trappers in certain locations to take game, and the board also allows the use of snowmachines to approach and pursue wolves and wolverine to aid in the take of game statewide. There are provisions that allow this in wolf control implementation areas and also in areas of the state that are primarily large wide-open regions where approaching and successfully harvesting an animal can be quite difficult. The board initially allowed this practice in limited places, and over time slowly relaxed the prohibitions to what they are today. Regulations allowing the use of snowmachines statewide for the particular regulation in question have been in place since 2022.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it addresses methods and means and is allocative in nature (resident vs. nonresident use). Prohibiting or allowing a particular method and means of take dependent on residency may be difficult for enforcement purposes. If the board adopts this proposal is should be aware that the use of snowmachines by nonresidents will still be allowed in the places listed in 5 AAC 92.080(4)(B)(i) and (ii). The department does not collect data on how often snowmachines are used by residents or nonresidents to pursue and take game under any of these regulations.

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

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PROPOSAL 133 – 5 AAC 92.080. Unlawful methods of taking game, exceptions. Prohibit the use of snowmachines to approach and pursue the take of wolverine.

PROPOSED BY: Rick Grant

WHAT WOULD THE PROPOSAL DO? The proposal would prohibit hunters and trappers from using snowmachines to approach and pursue wolverine in some areas.

WHAT ARE THE CURRENT REGULATIONS?

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

…

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

…

(B) motorized land vehicle may be used as follows:

(i) in Units 22, 23, and 26(A), a snowmachine may be used to position a caribou, wolf, or wolverine for harvest, and caribou, wolves, or wolverines may be shot from a stationary snowmachine;

…

(ix) a snowmachine may be used to approach and pursue wolves and wolverine; an approach and pursuit under this sub-paragraph is not harassment under (5) of this section but may not come in contact with a live animal;

There is a positive customary and traditional use finding for wolverine statewide in all units with a harvestable portion, with an amount reasonably necessary for subsistence uses of 90 percent of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters and trappers would not be able to use a snowmachine to approach and pursue wolves and wolverine except in the locations listed under 5 AAC 92.080(4)(B)(i), which are Units 22, 23, and 26A.

BACKGROUND: The board allows hunters and trappers to use snowmachines to approach and pursue wolves and wolverine statewide to aid in the take of game. There are provisions that allow this in wolf control implementation areas and also in areas of the state that are primarily large wide-open regions where approaching and successfully harvesting an animal can be quite difficult. The board initially allowed this practice in limited places, and over time slowly relaxed the prohibitions to what they are today. Regulations allowing the use of snowmachines statewide for the particular regulation in question have been in place since 2022.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it addresses methods and means; however, this proposal represents a reduction in opportunity for state residents; as such, to meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted. Title VIII of Alaska National Interests Lands Conservation Act specifically allows the use of snowmachines for subsistence purposes, so adoption of the regulation could result in conflicting state and federal regulations, making it difficult for Alaska residents to be in compliance with the regulations. Further, if the board adopts this proposal is should be aware that the use of snowmachines will still be allowed in the places listed in 5 AAC 92.080(4)(B)(i). The department does not collect data on how often snowmachines are used by to pursue and take game under any of these regulations.

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

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PROPOSAL 134 – 5 AAC 92.069 Special provisions for moose and caribou drawing permit hunts. Issue 90% of all moose drawing permits to Alaska residents.

PROPOSED BY: Douglas Malone

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal will allocate 90% of all moose drawing permits to State of Alaska residents.

WHAT ARE THE CURRENT REGULATIONS?

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

(a) In a moose drawing permit hunt specified in this section, a nonresident may apply for and obtain a permit only as follows:

(1) the department may issue a drawing permit under this section only to a successful nonresident applicant who meets the requirements of this section;

(2) the department shall enter, in a guided nonresident drawing, each complete application from a nonresident who will be accompanied by a guide; until June 30, 2015, the department may enter an application for the applicable hunt only to a nonresident applicant who presents proof at the time of application that the applicant will be accompanied by a guide, and that the guide has a guide use area registration on file with the Department of Commerce, Community, and Economic Development in accordance with AS 08.54.750 and 12 AAC 75.230, for the applicable guide use area during the season the drawing permit is valid;

(3) the department shall enter in a non-guided nonresident drawing all other complete applications from nonresidents.

(b) The department shall issue moose drawing permits as follows:

(1) in Units 21(D) and 24, the Koyukuk Controlled Use Area,

(A) the department shall issue a maximum of 50 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 50 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of guided nonresidents applying for permits is insufficient to award 50 percent of the available nonresident drawing permits, the department may award the remaining available nonresident drawing permits to non-guided nonresidents;

(B) an applicant for a guided nonresident drawing permit may apply for only one permit per application period;

(C) after the successful applicants have been selected by drawing, the department shall create an alternate list by drawing the remaining names of applicants for a specific hunt and placing the names on the alternate list in the order in which the names were drawn;

(D) if a successful applicant cancels the guided hunt, the person whose name appears first on the alternate list for that hunt shall be offered the permit; if an alternate applicant cancels the guided hunt, the permit must be offered in turn to succeeding alternate applicants until the alternate list is exhausted;

(E) if a guided nonresident drawing permit is available, but the alternate list is exhausted, the department shall issue permits by registration at the Fairbanks division of wildlife

conservation office, to the next succeeding non-guided nonresident, awarded in the order in which the names were drawn, until the alternate list is exhausted;

(2) in Unit 21(D), outside the Koyukuk Controlled Use Area, if the drawing permit hunt is allocated between residents and nonresidents, the department shall issue a maximum of 50 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 50 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of guided nonresidents applying for permits is insufficient to award 50 percent of the available nonresident drawing permits, the department may award the remaining available nonresident drawing permits to non-guided nonresidents;

(3) in Unit 21(B), that portion within the Nowitna River drainage upstream from the Little Mud River drainage and within the corridor extending two miles on either side of and including the Nowitna River, the drawing permit hunt is allocated 50 percent to residents and 50 percent to nonresidents; the department shall issue a maximum of 75 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 25 percent of the available nonresident drawing permits to non-guided nonresidents; if the number of nonresidents applying for permits for either nonresident hunt is insufficient to award the required percentage, the department may award the remaining available nonresident drawing permits to the other nonresident hunt;

(4) in Unit 23, that portion south of the north bank of the Kobuk River and Melvin Channel downstream of the Kobuk Valley National Park boundary below the Kallarichuk River mouth, the Selawik River drainage, the Kauk River drainage, and the Baldwin Peninsula; the department shall issue a maximum of 50 percent of the available nonresident drawing permits to guided nonresidents, and a minimum of 50 percent of the available nonresident drawing permits to non-guided nonresidents;

(5) in Unit 21(E), a maximum of 30 percent of the nonresident drawing permits will be issued to hunters using a registered guide, and a minimum of 70 percent of the nonresident drawing permits to hunters not using a registered guide; and

(6) in Unit 19(C), that portion west of the South Fork of the Kuskokwim River, east of the Windy Fork of the Kuskokwim River and north of a line between 62° 24.00' N. lat., 154° 7.00' W. long. and 62° 30.00' N. lat., 153° 32.00' W. long.; the department shall issue 70 percent of the available nonresident drawing permits to hunters who use a registered guide, and 30 percent of the available nonresident drawing permits to hunters who do not use a registered guide.

(c) The department shall issue caribou drawing permits as follows: in Unit 20(A) 15 percent of the available drawing permits will be issued to nonresidents and 85 percent of the available drawing permits will be issued to residents. The department shall issue 50 percent of the nonresident permits to hunters who use a registered guide, and 50 percent of the nonresident permits to hunters who do not use a registered guide.

Current nonresident moose drawing permit opportunity can be found in the 2025-2026 Alaska Drawing Permit Hunt Supplement.

Moose season and bag limits can be found in 5 AAC 85.045.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, residents will be guaranteed 90 percent of the available moose drawing permits, and nonresidents will be limited to 10 percent of the moose drawing permits offered annually. The allocations between residents and nonresidents found in 5 AAC 92.069 would all be changed to a 90/10 split, without exception, between residents and nonresidents.

BACKGROUND: The board has findings that help them determine how to allocate game in specific areas (2017-222-BOG). The allocation percentages found in 5 AAC 92.069 were set following the guidelines in those findings. Some hunters wish to set a cap on the number of permits available to nonresidents at a statewide level rather than following the guidelines laid out in the board findings.

Most moose hunting opportunities for residents is provided for through general season harvest tickets, followed by registration permits. In many places where residents hunt with a harvest ticket or registration permit, nonresidents are hunting with a drawing permit, which makes comparison of the interest in each hunt area difficult. It also makes it difficult to determine the number of nonresidents that are interested in hunting moose in Alaska. Most of the moose drawing permit hunts that are open to both residents and nonresidents without an existing allocation are on military bases, located within or very close to highly populated areas such as Anchorage and Fairbanks, and are not typically what hunters consider trophy moose hunting areas. Some of the hunts are also those open only to qualified disabled veterans and youth hunters.

Table 134.1 shows the number of nonresident and nonresident alien moose locking tags sold annually from 2017 to 2024. The numbers should be viewed with caution as not all locking tags sold result in a moose being harvested and hunters can use locking tags for a lesser-value animal. Also, nonresidents hunting moose with a general season harvest ticket or with a registration permit would have been required to have one of these tags as well.

Table 134.1 Nonresident and Nonresident Alien Moose Locking Tags Sold Annually.

	2024	**2023**	**2022**	**2021**	**2020**	**2019**	**2018**	**2017**
Nonresident	2916	3034	2833	2918	2131	2555	2352	1553
Alien	25	38	26	13	7	32	36	29

Table 134.2 shows the percentage of residents and nonresidents that applied for moose drawing permits annually from 2017 to 2024.These numbers should also be viewed with caution. The board and department have added and removed moose drawing permit hunts throughout these years and adjusted the number of permits available each year based on most recent population data. As a result, the figures in the table represent a general idea of annual interest in moose drawing permit hunts, which is influenced by the hunts available and the number of permits offered for each of those hunts.

Table 134.2. Percent Annual Resident and Nonresident Moose Drawing Permit Applications.

	2024	2023	2022	2021	2020	2019	2018	2017
Residents	□□	□□	□□	□□	□□	□□	□□	□□
Nonresidents	□	□	□	□	□	□	□	□

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters.

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

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PROPOSAL 135 – 5 AAC 92.050 Required permit hunt conditions and procedures.
Allocate 10 percent of big game permits to nonresidents, in hunts that have at least 10 permits available.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal will allocate 10% of all big game drawing permits to nonresident hunters in hunts that have no fewer than 10 permits available. In hunts that have less than 10 permits available, no nonresident permits will be issued.

WHAT ARE THE CURRENT REGULATIONS?

Additional special drawing permit provisions including existing allocations between residents and nonresidents (both guided and un-guided) for Dall's sheep and mountain goat, brown bear, and moose and caribou can be found in 5 AAC 92.057, 5 AAC 92.061, and 5 AAC 92.069, respectively.

Current nonresident big game drawing permit opportunity can be found in 2025-2026 Alaska Drawing Permit Hunt Supplement.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it will set the nonresident permit allocation at 10%, without exception, for all drawing permit hunts that do not already have an allocation in regulation and it will only be applicable when there are 10 or more permits available. When a hunt has nine or fewer permits offered, no nonresident permits will be issued.

BACKGROUND: The board has findings that help it determine how to allocate game in specific areas (2017-222-BOG). The allocation percentages found in 5 AAC 92.069 were set following the guidelines in those findings.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters, however the department is **OPPOSED** to the level of complexity the proposal would introduce for implementing the associated new regulations. The

department anticipates difficulty administering the proposed regulation, specifically, when there are less than 10 permits available, because many drawing permit hunts currently have less than 10 permits available. For example, many goat hunts in units 7, 14, and 15 have less than 10 permits available. These individual hunts were created using the department's discretionary authority found in 5 AAC 92.052 and were created specifically to allow maximum hunting opportunity by issuing the number of permits appropriate in each survey area. In this specific example, nonresident hunting opportunity would be removed entirely.

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

****

PROPOSAL 136 – 5 AAC 92.050(a)(2)(A) and (H). 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.

PROPOSED BY: Russel Hawkins

WHAT WOULD THE PROPOSAL DO? This proposal would limit a person to being able to win a bison and musk ox drawing permit hunt only once in a lifetime, and only allow applicants to apply for one drawing permit hunt for bison and one drawing permit hunt for musk ox per application period.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters may harvest one bison every 10 regulatory years by drawing permit. A resident who is a successful applicant for a bison drawing permit hunt is ineligible to apply for another bison drawing permit for 10 years. Nonresident hunters may harvest one bison by drawing permit. A nonresident who is a successful applicant for a bison drawing permit hunt is ineligible to apply for another bison drawing permit.

Applicants may submit up to six applications per species per regulatory year; and may apply for the same hunt more than once (all six choices per species can be for one hunt).

The number of permits that may be issued per household are not limited. No more than 2 hunters desiring to hunt together may apply as a party, whether they are from the same household or not.

The application fee for bison and muskox is set by the legislature in statute, and is $10 per choice, for a maximum of $60 for bison and $60 for muskox. The application fee is the same for residents and nonresidents, although applicants are required to have a current or future year hunting license at the time of application. License fees for nonresidents are substantially higher than the fee for residents (currently $35 for residents, $130 for nonresidents, and $600 for nonresident aliens).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would eliminate the eligibility of a resident to win more than one bison permit in a lifetime regardless of whether they successfully harvest or not. This would align resident

eligibility with that of nonresidents. Adoption of this proposal would also eliminate the possibility of a resident to win more than one musk ox permit in a lifetime. In addition, it would require the department to adjust administration of the drawing process for bison and musk ox permits to accommodate reducing the number of drawing hunt applications allowed for these species from six to one.

BACKGROUND: The department has conducted Alaska bison hunts since 1950. Since 2000 the department has awarded a total of 3,852 bison drawing hunt permits. Sixty- three individuals (1.6%) have drawn a bison permit more than 1 time since then. Two of these 63 individuals may have drawn 3 permits. Also, since 2000, it is possible that approximately 140 bison permits could have been drawn by members of the same household, though there is no mechanism for applicants to list members of a household. The average number of annual applicants for bison permits has been 28,712 since 2000 (high of 56,226 in 2023; low of 11,549 in 2006).

In January 2008, the Board of Game approved changing the eligibility for bison permits for residents from 1 permit every 5 years to 1 permit every 10 years, and to 1 permit in a lifetime for nonresidents. Since this change went into effect in regulatory year (RY) 09, nineteen individuals (16 residents and 3 nonresidents) have won more than one bison permit.

Though the first musk ox drawing permit hunt was authorized in 1974, nonsubsistence harvest opportunities for musk ox have been limited. Since 2000, the department has awarded 1,537 musk ox drawing hunt permits. Fifty- nine individuals (<4%) have drawn a musk ox permit more than 1 time since 2000. Five of these 59 individuals may have drawn 3 permits. Also, since 2000, it is possible that approximately 82 musk ox permits could have been drawn by members of the same household, though there is no mechanism for applicants to list members of a household. The average number of annual applicants for musk ox permits has been 4,243 since 2000 (high of 18,352 in 2023; low of 1,011 in 2005).

The drawing hunt application fee for bison and musk ox is $10. In RY24, the department received 56,182 applications for bison drawing hunt permits and 18,339 applications for musk ox drawing hunt permits.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocation issue because the proposal does not create nor address a conservation concern. Application fees for drawing permits are set by the legislature and the board does not have the authority to increase those fees.

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

****

PROPOSAL 137 – 5 AAC 92.050 Required permit hunt conditions and procedures. Change the drawing permit application process.

PROPOSED BY: Gary Feaster

WHAT WOULD THE PROPOSAL DO? Options provided by the author of this proposal will alter several drawing permit award processes for high interest species like Dall's sheep, bison, musk ox, caribou, elk, and mountain goat.

WHAT ARE THE CURRENT REGULATIONS?

Current permit regulations can be found in 5 AAC 92.050 and are also printed in the 2025-2026 Alaska Drawing Permit Hunt Supplement.

5 AAC 92.050. Required permit hunt conditions and procedures.

(a) The following conditions and procedures for permit issuance apply to each permit hunt:

…

(2) except as provided in 5 AAC 92.061 and 5 AAC 92.069, a person may not

(A) apply for more than six drawing permit hunts for the same species per regulatory year;

(B) repealed 7/1/2016;

(C) apply for more than one moose drawing permit for a nonresident in Unit 23 per regulatory year; or

(D) hold more than one drawing permit for the same species per regulatory year;

(3) the commissioner shall void all applications by one person for more than six hunts for the same species, and all applications by one person for more than one moose hunt for a nonresident in Unit 23;

(4) permit issuance:

…

(E) the department may issue additional drawing hunting permits or Tier II subsistence hunting permits for specific hunts, in excess of the number established by other regulation, in order to correct administrative error in processing permit applications that has resulted in the denial of a permit to an applicant entitled to receive one;

(F) an individual who is a successful applicant for a specific drawing permit hunt is ineligible to apply for a permit for that specific hunt the following year;

(G) an individual who is a successful applicant for a Koyukuk Controlled Use Area moose drawing permit is ineligible to apply for a Koyukuk Controlled Use Area moose drawing permit the following year;

(H) a resident who is a successful applicant for a bison drawing permit hunt is ineligible to apply for another bison drawing permit for 10 years; a nonresident who is a successful applicant for a bison drawing permit hunt is ineligible to apply for another bison drawing permit;

(I) no more than one Unit 13 Tier I subsistence permit for caribou may be issued per household every regulatory year; the head of household, as defined in 5 AAC 92.071(b), and any member of the household obtaining a Unit 13 Tier I subsistence permit in a regulatory year

for caribou may not hunt caribou or moose in any other location in the state during that regulatory year;

(J) in hunts where 10 or more drawing permits are awarded, and in a situation where the final drawing permit is to be awarded and two applicants have applied as a party, the department may issue an additional permit in excess of the number of permits otherwise authorized by regulation, to allow both applicants of the party to receive a permit;

…

(M) for each resident registration permit issued by the department under (L) of this paragraph, the department will reduce the number of drawing permits available in the same area for the same early season elk hunt by one;

(5) except as provided in (6) of this subsection, a permit is nontransferable; however, the department may reissue an invalidated Tier II subsistence hunting permit to the highest-ranked applicant remaining in the original pool of eligible applicants;

(6) the commissioner may reissue or transfer a permit as follows:

(A) a permit may be transferred for scientific purposes;

(B) a person that is on active duty, National Guard or Reserves status in a branch of the military under United States Department of Defense and who is under orders of a state's governor or the President of the United States for deployment to a combat zone, for purpose of humanitarian aid, peace-keeping, increased security, homeland defense, defense support of civil authority, or evacuation of United States citizens and that has been issued a

(i) drawing permit, and is prevented from using the drawing permit due to being out of the state on active duty, may be reissued the same drawing permit when the person returns to this state from active duty under this subparagraph, under procedures set out in the applicable permit hunt supplement;

…

(D) drawing hunt permit may, upon request, have the permit transferred to a qualified substitute in the event of the original permit holder's death, as provided for in AS 16.05.404 and AS 16.05.420(c).

…

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED: If adopted this proposal may provide additional opportunities for hunters to participate in drawing permit hunts for highly sought after species. However, the probability of drawing a permit is impacted by both interest (number of drawing permit applications) and the number of permits available.

BACKGROUND: There has been interest from the public to improve the odds of drawing a permit for several highly sought after species and hunts. It is understandable that drawing permit applicants get frustrated submitting applications for hunts, year after year, without ever being drawn for a permit; however, this is a function of random drawing. The number of applicants for a hunt and the number of permits available to be drawn are the determining factors for an applicant's chance to be receive a permit. The results of the 2024-2025 hunts listed in the 2025-2026 Alaska Drawing Permit Hunt Supplement indicate that <1% of the applicants were drawn for fifty-six of the 361 permit hunts. This was due to the high number of applications received. As noted in the proposal, interest in drawing hunts has increased over time. It is difficult to

anticipate how application numbers will change due to the number of people that want to hunt, and the number of new applicants each year. Interest can also be influenced by reduced opportunity in other areas of Alaska due to harvestable surplus declines or when harvest is not appropriate because of abundance.

The number of permits available for a hunt depends on the harvestable surplus of the species population in the hunt area. The number of available permits are regularly updated in both times of abundance and decline because the department has a mandate to manage game species for sustained yield. Weather, harvest, disease, and other factors can all impact the harvestable surplus, and ultimately the number of permits offered for a hunt. At times, drawing hunts are cancelled altogether because of significant abundance declines.

Many of the suggestions offered in proposals throughout the years have been to create and implement a bonus or preference points system. An Ad hoc survey of western state wildlife officials resulted in recommendations to avoid such programs given the difficulty in administering the programs, little change in outcome for applicants, and the fact that once administered it is extremely difficult if not impossible to move away from the system. To explore implementation feasibility, department staff drafted a possible implementation process and estimate ~1500-2000 hours of staff time would be required to complete a program to implement this proposal. A dollar estimate is not available at this time but would include both staff time and a significant expansion (complete new build) of the current hunt management system to support such a venture. Many of the populations managed partially by drawing hunts also have registration and general season hunt opportunity included in hunt management to maximize hunting opportunity. The department recognizes these opportunities may not be of the highest interest to hunters, but with few species-specific or area-specific exceptions, most hunting opportunities throughout the state are available without a drawing permit.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. All the options provided by the author are allocative and do not present a biological concern. The department **OPPOSES** the excessive cost and time needed to build and program a computer system to process applications, award permits, and track bonus or preference points, without an indication it will significantly improve an individual's chances of being awarded a permit. As noted, hunters have submitted numerous proposals attempting to improve the odds of drawing a permit for highly sought after species, but the probability of drawing a permit is driven by the number of applications and permits available; this proposal does not, and cannot, control those factors. The number of permits available to draw are based on the harvestable surplus available for management within sustained yield for a species population.

Because of the complex nature of changes to these regulations, if the board chooses to adopt this or a similar proposal, the department requests a delayed implementation such as until the next statewide proposal meeting.

COST ANALYSIS: Adoption of this proposal may result in additional unbudgeted for expenses for the department depending on the final regulatory language. Some of the options provided in this proposal will not result in significant costs to the department.

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PROPOSAL 138 – 5 AAC 92.016. Musk oxen tag fees. Remove the requirement for a locking tag in subsistence musk ox hunts follows:

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal removes the requirement for residents to have a metal locking-tag when hunting musk oxen in subsistence hunts.

WHAT ARE THE CURRENT REGULATIONS?

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.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted hunters would not need a free metal-locking tag to hunt musk oxen in subsistence hunts.

BACKGROUND: 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 Alaska Department of Fish and Game (ADF&G) 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.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** the proposal to reduce regulatory complexity and confusion for hunters.

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

****

PROPOSAL 139 – 5 AAC 92.150. Evidence of sex and identity. Change the evidence of sex requirements for species with horns.

PROPOSED BY: Bethel Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The proposal would remove the requirement for evidence of sex to remain naturally attached for horned animals, and would instead specify that

horns are evidence of sex for animals with horns. The proposal also makes it clear that the horns may be transported simultaneously with the last load of meat, which is currently allowed.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.150. Evidence of sex and identity.

(a) Horns of a Dall sheep must be salvaged.

(b) If the taking of a big game animal, except sheep, is restricted to one sex, a person may not possess or transport the carcass of an animal unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except that antlers are considered proof of sex for a deer if the antlers are naturally attached to an entire carcass, with or without the viscera; however, this section does not apply to the carcass of a big game animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

(c) If a big game bag limit includes an antler size or configuration restriction, both antlers must be salvaged. A person possessing a set of moose antlers with less than the required number of brow tines on one antler shall leave the antlers naturally attached to the unbroken, uncut skull plate. If antlers or horns must be salvaged, they may not be altered before the completion of all salvage requirements, unless alteration is required under permit conditions. In Unit 1(B), that portion of Unit 1(C) south of Port Hobart, including all Port Houghton drainages, and Unit 3, a damaged, broken, or altered antler is not considered a spike-fork antler as defined in 5 AAC 92.990.

(d) In those areas where sealing is required, until the hide has been sealed by a representative of the department, no person may possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.

(e) In those areas where sealing is required only for the skull of a bear, a person who possesses or transports the meat of a bear must keep sufficient portions of the external sex organs naturally attached to indicate conclusively the sex of the bear until the skull of the bear has been sealed by a representative of the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, goats and muskox would be treated more similarly to sheep; and horns of both goats and muskox would be required to be salvaged. Successful goat and muskox hunters in hunts limited to one sex would no longer be required to salvage evidence of sex.

BACKGROUND: When existing salvage requirements were created most goat and muskox hunts were not restricted to a single sex, although most sheep hunts at the time were limited to only one sex. The existing regulation requires some goat hunters and some muskox hunters to salvage the evidence of sex and to keep it naturally attached to the part of the animal required to be salvaged. This requirement does not exist for sheep largely because in many areas only rams may be harvested and the bag limit for most sheep is a full-curl ram. The difference in horns between a ewe and a full-curl ram is quit distinct. Those same distinctions are not as noticeable for goats and muskox. It can be quite difficult, if not impossible, at times to tell the difference

between a nanny and billy goat, and a bull and cow muskox. This is further complicated because all age-classes of goats and muskox are legal animals.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal, but encourages the board to examine salvage and evidence requirements for each species individually. It may not be appropriate to use horns as a requirement as evidence of sex for species where both sexes have horns. Adoption of the proposal may remove the ability for AWT to accurately determine sex while contacting successful hunters in the field

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

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PROPOSAL 140 – 5 AAC 92.150. Evidence of sex and identity. This proposal would eliminate the evidence of sex requirement for big game having bag limits restricted to one sex.

PROPOSED BY: Lance Nelson

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the evidence of sex requirement for big game having bag limits restricted to one sex. The proponent also mentions changing the definition of evidence of sex to include horns or antlers, presumably for all horned or antlered game, but it is unclear if the proposer intended it be included for this proposal.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.150. Evidence of sex and identity.

(a) Horns of a Dall sheep must be salvaged.

(b) If the taking of a big game animal, except sheep, is restricted to one sex, a person may not possess or transport the carcass of an animal unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except that antlers are considered proof of sex for a deer if the antlers are naturally attached to an entire carcass, with or without the viscera; however, this section does not apply to the carcass of a big game animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

(c) If a big game bag limit includes an antler size or configuration restriction, both antlers must be salvaged. A person possessing a set of moose antlers with less than the required number of brow tines on one antler shall leave the antlers naturally attached to the unbroken, uncut skull plate. If antlers or horns must be salvaged, they may not be altered before the completion of all salvage requirements, unless alteration is required under permit conditions. In Unit 1(B), that portion of Unit 1(C) south of Port Hobart, including all Port Houghton drainages, and Unit 3, a damaged, broken, or altered antler is not considered a spike-fork antler as defined in 5 AAC 92.990.

(d) In those areas where sealing is required, until the hide has been sealed by a representative of the department, no person may possess or transport the hide of a bear that does not have the

penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.

(e) In those areas where sealing is required only for the skull of a bear, a person who possesses or transports the meat of a bear must keep sufficient portions of the external sex organs naturally attached to indicate conclusively the sex of the bear until the skull of the bear has been sealed by a representative of the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would eliminate the requirement to keep sex organs naturally attached to show the sex of a game animal in a hunt with a bag limit that is restricted to one sex. A different regulation for determining sex of a harvested game animal (except for sheep and deer with antlers naturally attached to the entire carcass) would need to be adopted by the board.

The proposed alternative of determining sex of a game animal through DNA testing would greatly increase the amount of time necessary for an authorized Alaska Department of Fish and Game employee or Department of Public Safety officer to ensure bag limit compliance. The difference in the amount of time it takes to visually inspect a carcass and the amount of time it would take to sample tissue, handle, catalog, and ship the sample, test the sample, and receive the results is substantial. Details for possession and/or storage of the meat while waiting for test results and identification of the funding source to pay for the testing of thousands of harvested animals would need to be determined by the department and the Alaska Wildlife Troopers (AWT).

A change to the definition of evidence of sex to include horns or antlers would require an exception for caribou. The sex of caribou is not reliably identified by the presence of antlers.

BACKGROUND: Currently, hunters taking a game animal in areas restricting the take to one sex must leave sufficient portions of the external sex organs naturally attached to clearly indicate the sex of the animal. A primary reason for this regulation is protection of female animals in a population. Females represent the reproductive component of a population and regulation of female harvest is essential in sustained yield management. For example, without this regulatory tool, a female moose carcass and a set of antlers and/or detached external sex organs can be presented as a male moose carcass. Leaving evidence of sex naturally attached, usually to a hind quarter, minimizes the potential for non-compliance of bag limits in sex-restricted hunts.

The use of DNA as suggested by the proponent will require submission of one to two inch portion of skeletal muscle tissue to a laboratory. For example, the UC-Davis Veterinary Laboratory can run a test to determine sex identification at the cost of $44 per test and a turnaround time of 15 days. The samples must be frozen and mailed on ice overnight.

The proponent mentioned the risk of meat spoilage due to leaving male sex organs attached to hindquarters. Division of Wildlife Conservation has no data on spoilage of meat due to this reason.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it would remove the ability of AWT to determine legality in the field and would make in-season

enforcement impossible. Currently AWT and department staff can take photos of evidence of sex, or lack of evidence, and can issue citations quickly. Requiring samples to be taken and tracked for chain of custody could take weeks and introduce questions about proper handling of the samples.

Changing the definition of evidence of sex to include horns or antlers as suggested is also problematic because the head is not required to be salvaged in many hunts and antlers are only required to be salvaged in antler restricted hunts. The department is OPPOSED to such a change.

COST ANALYSIS: Adoption of this proposal would result in additional costs to the department for processing DNA tests.

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PROPOSAL 141 – 5 AAC 92.135. 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:

PROPOSED BY: Regg Simon

WHAT WOULD THE PROPOSAL DO? The proposal would allow a video-recording to satisfy the requirements in 5 AAC 92.135(a), which are currently only acceptable in a statement signed by both parties.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.135. Transfer of possession.
(a) Unless the person who took the game is accompanying the person possessing the game, until all salvage is completed as required under this chapter, a person who gives or receives game or a part of game shall immediately furnish, upon demand by a peace officer a statement signed by both parties describing the following:

(1) the names and addresses of each person who gave or received the game;
(2) when and where the game was taken;
(3) what game or part of game was transferred; and
(4) the hunting license number of the person who took the game.

(b) Upon receipt of game or a part of game, the recipient shall then be responsible to salvage the edible meat for human consumption.
(c) A person giving, shipping, or receiving game or parts of game shall allow inspection of that game or parts of game upon request from a peace officer of the state or a federal fish and wildlife agent.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted a digital image would be allowed in place of the currently required signed statement.

BACKGROUND: The required information can currently be documented on any material, provided it contains all of the required information. The department provides a courtesy blank

form on the inside back cover of the Alaska Hunting Regulations, but use of the exact form is not required.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Proof of transfer of possession is a document primarily used by law enforcement to assure game was salvaged in accordance with applicable regulations and is not required for sealing or reporting purposes. As a result, the department also does not know how often transfer of possession forms are used.

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

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PROPOSAL 142 – 5 AAC 92.031. Permit for selling skins, skulls, and trophies. Eliminate the requirement for a permit to sell legally harvested big game trophies.

PROPOSED BY: Russell Knight

WHAT WOULD THE PROPOSAL DO? The proposal would eliminate the need for a permit to sell a legally harvested big game trophy.

WHAT ARE THE CURRENT REGULATIONS?

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

(a) A licensed taxidermist may sell an unclaimed, finished skin or trophy under a permit issued by the department after the finished skin or trophy has been held unclaimed for six month, 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.

(b) A court appointed or duly authorized estate executor, or a referee in a bankruptcy, may sell a game skin or trophy in a bankruptcy or probate action if that person first obtains a permit from the department.

(c) Repealed 7/1/2008.

(d) Repealed 7/1/2008.

(e) Repealed 7/1/2008.

(f) A person who has obtained ownership of a big game trophy as a result of a divorce may sell that big game trophy only if that person first obtains a permit from the department after providing the department with a list of the big game trophies being sold and a divorce decree documenting ownership.

(g) A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year only after first obtaining a permit from the department. Any advertisement must include the permit number assigned by the department, and the department will permanently mark all hides and skulls intended for sale. All bears sold under this permit must be reported to the Department within the time frame specified on the permit.

(h) A person may sell a lawfully harvested and prepared big game trophy if that person first obtains a permit from the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the public would not need a permit to sell a lawfully harvested and prepared big game trophy. The department would no longer be able to track how many trophies are sold for reasons other than those sold as part of a bankruptcy, divorce, estates in probate, and taxidermists with unclaimed trophies.

BACKGROUND: A permit is required before any big game trophy can be sold. At the Statewide 2022 Board of Game meeting, the board adopted the existing regulation which

allowed all trophies to be sold, not just those that were sold as a result of bankruptcy, divorce, estates in probate, or trophies that were in the possession of taxidermists and never claimed.

Currently, persons wishing to sell trophies for any reason must first submit a complete application. A permit is typically issued within 30 days of receiving the complete application. Permits are valid for six months but may be renewed unlimited times and there is no fee for the permit or to apply for the permit.

Prior to the board making it legal to sell all trophies with a permit, the most common reason the department received requests to sell trophies was from estates that were not in probate (Table 142.1). Probate is required when a person dies and owns property that does not automatically pass to someone else; many widows and widowers were left with trophies that could not be sold.

Table 142.1 Number of permits issued to sell big game trophies (2019-2024).

	2024	**2023**	**2022**	**2021**	**2020**	**2019**
Divorce	0	0	1	0	2	2
Bankruptcy	0	0	0	0	0	0
Probate	6	11	12	8	10	7
Other	87	102	29	NA*	NA*	NA*

*Other was not an option until 2022.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. By requiring a permit for each trophy sale, the department has a general idea if there is an interest in for-profit hunting. The regulations allowing all trophies to be sold has been in effect since July 2022; as a result, the department has limited data available to establish a baseline trend in trophy sales for reasons other than bankruptcies, divorces, estates in probate, and taxidermists' needs.

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

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PROPOSAL 143 – 5 AAC 92.200. Purchase and sale of game. Allow the sale of legally harvested big game trophies.

PROPOSED BY: Russell Knight

WHAT WOULD THE PROPOSAL DO? The proposal would allow the sale of all big game trophies and most skulls, and would allow big game trophies to be bartered.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.200. Purchase and sale of game.

(a) In accordance with AS 16.05.920(a) and 16.05.930(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 areas where the bag limit is two bears per regulatory year by permit issued under 5 AAC 92.031;

(2) a big game trophy, or a black bear trophy of any kind;

(3) a big game 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;

(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 92.170(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 gallbladder 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.

(d) Notwithstanding (b)(2) and (3) of this section, a licensed taxidermist, estate executor, divorced person, or bankruptcy referee, may sell a skin or trophy by permit issued under 5 AAC 92.031, and the state may sell a skin or trophy as excess property. A person may purchase and possess an animal skin or trophy sold under this subsection. However, a person may not resell a skin or trophy purchased from a seller under this subsection.

(e) the barter of subsistence-taken game meat is subject to the following:

(1) the following individuals and businesses are prohibited from engaging in the barter of game meat taken for subsistence uses:

(A) a person or business holding a license under AS 43.70 or AS 43.75, or its employee, to engage in the commercial sale of the food items or nonedible items provided by the barter exchange; and

(B) a person or business licensed under AS 43.70 or AS 43.75, or its employee, to engage in providing the services provided by the barter exchange;

(2) the terms of this subsection do not restrict barter of furs and furbearers, or barter of handicrafts;

(3) a person may not barter a big game animal horn or antler that is still attached to any part of the skull, or a big game animal skull, except the skull of a black bear, wolf, or wolverine;

(4) in this subsection, "commercial" means for profit or disposal in commercial channels.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the public would not need a permit to sell a lawfully harvested and prepared big game trophy. The department would no longer be able to track how many trophies are sold for reasons other than those sold as part of a bankruptcy, divorce, estates in probate, and taxidermists with unclaimed trophies.

BACKGROUND: A permit is required before any big game trophy can be sold. At the Statewide 2022 Board of Game meeting, the board adopted the existing regulation which allowed all trophies to be sold, not just those that were sold as a result of bankruptcy, divorce, estates in probate, or trophies that were in the possession of taxidermists and never claimed. Most people found those requirements burdensome.

Persons wishing to sell trophies for any reason must first submit a complete application. A permit is typically issued within 30 days of receiving the complete application. Permits are valid for six months but may be renewed unlimited times and there is no fee for the permit or to apply for the permit.

Prior to the board making it legal to sell all trophies with a permit, the most common reason the department received requests to sell trophies was from estates that were not in probate (Table 143.1). Probate is required when a person dies and owns property that does not automatically pass to someone else; many widows and widowers were left with trophies that could not be sold.

Table 143.1. Number of permits issued to sell big game trophies (2019-2024).

	□□□□	□□□□	□□□□	□□□□	□□□□	□□□□
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*Other was not an option until 2022.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. By requiring a permit for each trophy sale, the department has a general idea if there is an interest in for-profit hunting. The regulations allowing all trophies to be sold has been in effect since July 2022; as a result, the department has limited data available to establish a baseline trend in trophy sales for reasons other than bankruptcies, divorces, estates in probate, and taxidermists' needs.

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

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PROPOSAL 144 – 5 AAC 92.031. Permit for selling skins, skulls, and trophies. Shorten the minimum time period a taxidermist must wait before selling unclaimed furs, skins and trophies.

PROPOSED BY: Josh Livingston

WHAT WOULD THE PROPOSAL DO? The proposal would shorten the minimum time period a taxidermist must wait before beginning the process to allow the sale of unclaimed finished skins, and trophies from 6 months to 60 days.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.031. Permit for selling skins, skulls, and trophies. (a) A licensed taxidermist may sell an unclaimed, finished skin or trophy under a permit issued by the department after the finished skin or trophy has been held unclaimed for six month, 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.

(b) A court appointed or duly authorized estate executor, or a referee in a bankruptcy, may sell a game skin or trophy in a bankruptcy or probate action if that person first obtains a permit from the department.

(c) Repealed 7/1/2008.

(d) Repealed 7/1/2008.

(e) Repealed 7/1/2008.

(f) A person who has obtained ownership of a big game trophy as a result of a divorce may sell that big game trophy only if that person first obtains a permit from the department after providing the department with a list of the big game trophies being sold and a divorce decree documenting ownership.

(g) A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year only after first obtaining a permit from the department. Any advertisement must include the permit number assigned by the department, and the department will permanently mark all hides and skulls intended for sale. All bears sold under this permit must be reported to the department within the time frame specified on the permit.

(h) A person may sell a lawfully harvested and prepared big game trophy if that person first obtains a permit from the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, taxidermists would be able to sell unclaimed finished skins and trophies four months earlier than is currently allowed.

BACKGROUND: In January 2006 the board shortened the waiting period from one year to six months. The justification at the time was that the six month waiting period, combined with the required notification procedures, would be sufficient to protect the interests of the trophy owner while reducing the financial burden on the taxidermist. In 2019 the department issued 4 permits to taxidermists to sell unclaimed trophies, 1 in 2020, 1 in 2021, 2 in 2022, none in 2023, and 2 in 2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it does not create nor address a biological issue and does not impact how resources are managed. The desired change can be implemented easily, and the current regulation is not an administrative burden.

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

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PROPOSAL 145 – 5 AAC 92.029. Permit for possessing live game. Add Eurasian eagle owl to the list of animals allowed to be possessed without a permit.

PROPOSED BY: Bennett Wong

WHAT WOULD THE PROPOSAL DO? This proposal would add Eurasian eagle owls to the list of animals that can be possessed without a permit.

WHAT ARE THE CURRENT REGULATIONS?

(a) Except as otherwise provided in this chapter, or in AS 16, no person may possess, import, release, export, or assist in importing, releasing, or exporting, live game, unless the person holds a possession permit issued by the department. (b) The following species, not including a hybrid of a game animal and a species listed in this subsection, may be possessed, imported, exported, bought, sold, or traded without a permit from the department but may not be released into the wild:

Common Name	Scientific Name
Dog	*Canis familiaris*
Cat	*Felis catus*
Sheep	*Ovis aries*
Goat	*Capra hircus*
Cattle	*Bos taurus*
Oxen	*Bos spp.*
Horse	*Equus caballus*
Guinea pig	*Cavia porcellus*
Reindeer (except feral reindeer)	*Rangifer tarandus Var.*
Llama	*Lama peruana*
Alpaca	*Lama pacos*
One-humped camel	*Camelus dromedarius*
Ass	*Equus asinus Var.*

Mule	*Equus asinus x caballus*
Swine	*Sus scrofa Var.*
European ferret	*Mustela putorius furo*
European rabbit	*Oryctolagus cuniculus Var.*
White rat	*Rattus norvegicus Var. albinus*
Mice: white, waltzing, singing, shaker, piebald	*Mus musculus Var.*
Fat-tailed gerbil	*Pachyuromys duprasi*
Gerbil	*Gerbillus spp.*
Hamster (golden)	*Mesocricetus auratus*
Chinchilla	*Chinchilla laniger*
Cavy	*Cavia aperea*
Hedgehog, African Pygmy	*Erinaceus albiventris*
Chicken	*Gallus gallus Var.*
Pigeon	*Columia livia Var.*
Any Turkey species	Subfamily Meleagridinae
Any Pheasant, Junglefowl or Coturnix species	Subfamily Phasianidae
Any Guineafowl species	Subfamily Numidinae
Canary	*Serinus canaria Var.*
Parrot, parakeet, cockatiel, macaw, and other members of the Family Psittacidae not prohibited by federal or international law	Family Psittacidae
Toucan	Family Ramphastidae
Any New World Quail species (including Bobwhite)	Subfamily Odontophoridae
Mynah	*Acridotheres spp.*
Any Peafowl species	*Pavo spp.*
Any duck, goose, swan, or other migratory waterfowl which the U.S. Fish and Wildlife Service determines does not require a federal permit for private ownership	
Chukar partridge	*Alectoris chukar*
Button "quail"	Family Turnicidae in the order Gruiformes
Any nonvenomous reptile (crocodile, alligator, snake, turtle, or lizard)	Class Reptilia
Members of the bird families Fringillidae, Turdidae, Zosteripidae, Pycnonotidae, Timaliidae, and Ploceidae of non- Holarctic origin.	
Members of the bird families	

Columbidae and Trogonidae of
non- nearctic origin.
Elk (except feral and wild elk) (*Cervus elaphus*)
Bison (except feral and wild bison) (*Bison bison*)
Muskoxen (except feral and wild muskoxen) (*Ovibos moschatus*)

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Eurasian eagle owls would be allowed to be kept as a pet within the state of Alaska if this proposal were adopted.

BACKGROUND: The Eurasian eagle owl (*Bubo bubo*) is not currently on the Endangered or Threatened species list. However, according to the Peregrine Fund, populations have drastically declined during the first half of the 1900s and reintroduction programs have taken place.

The Eurasian eagle owl is a raptor species. Raptors take a considerable amount of knowledge and skill to maintain humanely. Further, all owls can contract and carry Highly Pathogenic Avian Influenza (HPAI). Adding this bird to the clean list may result in uneducated owners inhumanely handling the birds as well as an increased risk of higher HPAI infection rates in the state.

The Eurasian eagle owl is not native to Alaska, but would likely be able to survive in the Alaskan wilderness due to similar habitat in its native area. This may greatly impact prey species populations (known to eat small mammals such as voles as well as other birds including other raptors) and create competition with native predator species.

Currently, only educational facilities are authorized to own raptors and raptors are also managed federally. All educational facilities must meet basic requirements including having a veterinarian, maintaining feeding/behavior/medical logs, and creating enrichment plans.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The Eurasian eagle owl is a complex raptor with significant health and behavior needs. It should not be available to the public as a pet. Further, if the owl were to escape from the owner, it is possible that it would mate/interact with wild raptor populations increasing risk of native raptor decline and disease, and could potential compete with native raptors for food.

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

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PROPOSAL 146 - 5 AAC 92.029. Permit for possessing live game. Allow the release of sterilized, feral cats into the wild.

PROPOSED BY: J. Rintala

WHAT WOULD THE PROPOSAL DO? The proposal would allow the release of sterilized feral cats into the wild.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.029 allows cats (*Felis catus*) to be possessed without a permit and prohibits them from being released into the wild.

5 AAC 92.029. Permit for possessing live game. (a) Except as otherwise provided in this chapter, or in AS 16, no person may possess, import, release, export, or assist in importing, releasing, or exporting, live game, unless the person holds a possession permit issued by the department. (b) The following species, not including a hybrid of a game animal and a species listed in this subsection, may be possessed, imported, exported, bought, sold, or traded without a permit from the department but may not be released into the wild:

Common Name	Scientific Name
…	
Cat	*Felis catus*
…	

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Sterilized feral cats could legally be released to the wild, except where prohibited by local governments.

BACKGROUND: Trap-Neuter-Release (TNR) programs are implemented throughout the US, often at the municipality level, in an effort to stabilize or reduce feral/community cat populations as an alternative to the trap/euthanize option. Proponents of TNR programs argue that this option is cost-efficient, sustainable, and a humane alternative for managing feral cat colonies by increasing the number of neutered cats, decreasing unwanted litters, reducing shelter and animal control costs and increasing vaccination rates of cats.

The American Association of Wildlife Veterinarians (AAWV), American Society of Mammalogists (ASM), and many in the scientific community oppose TNR programs. Repeated studies show TNR programs are ineffective at controlling feral cat populations. One study calculated between 71-94% of cats in a single feral colony would need to be neutered for the program to be effective and also that this percentage of sterilization has rarely been achieved. While TNR programs vaccinate cats during the trap/neuter process, they do not address that effective vaccination of an animal requires multiple booster shots throughout the duration of the animal's life. Feral cats that become trap shy would be extremely hard to recapture and administer additional doses to.

Disease risks associated with feral cats pose threats to public health. Cats can carry rabies, toxoplasmosis, cat bite cellulitis, cat-scratch disease, cutaneous larva migrans (hookworms), visceral larva migrans (roundworms), fleas, and flea-borne diseases. These diseases can be transmitted to humans through direct contact with the animal (scratch/bite) or through the environment (fecal contamination of dirt). If contracted, human symptoms from these diseases range from mild infection to death. Toxoplasmosis alone has been linked to many human diseases/disorders, including Parkinson's, autism, schizophrenia, Alzheimer's, psychosis, suicide, and personality changes. Additionally, feral cat colonies can serve as a disease-vector for other animals, such as raccoons, opossums, coyotes, foxes, and others, that are attracted to the available food source.

ADF&G and other government agencies are charged with the management, conservation, and preservation of native flora and fauna. Multiple scientific studies have shown that cats have an innate behavior to hunt and feral cats kill millions of wild birds and small mammals annually, regardless of cat ownership status, vaccination, reproductive potential, or on the availability of food. Studies also show significant reductions in native bird and rodent diversity near feral cat colonies compared to similar habitat without the presence of feral cats.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because of disease transmission, public health concerns, and because feral cats kill millions of wild birds and small mammals annually.

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

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PROPOSAL 147 – 5 AAC 92.029 Permit for possessing live game. Delegate authority to the Commissioner of the Department of Fish and Game to manage the clean list.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Delegate regulatory authority from the Alaska Board of Game (board) to the commissioner of the Department of Fish and Game to maintain the list of species allowed to be possessed in Alaska without a permit, also known as the clean list.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.029. Permit for possessing live game.

(a) Except as otherwise provided in this chapter, or in AS 16, no person may possess, import, release, export, or assist in importing, releasing, or exporting, live game, unless the person holds a possession permit issued by the department.

(b) The following species, not including a hybrid of a game animal and a species listed in this subsection, may be possessed, imported, exported, bought, sold, or traded without a permit from the department but may not be released into the wild:
Common NameScientific NameDogCanis familiaris CatFelis catus SheepOvis aries GoatCapra hircus CattleBos taurus OxenBos spp.HorseEquus caballus Guinea pigCavia porcellus Reindeer (except feral reindeer)Rangifer tarandus Var.LlamaLama peruana AlpacaLama pacos One-humped camelCamelus dromedarius AssEquus asinus Var.MuleEquus asinus x caballus SwineSus scrofa domesticusEuropean ferretMustela putorius furo European rabbitOryctolagus cuniculus Var.White ratRattus norvegicus Var. albinus Mice: white, waltzing, singing,Mus musculus Var. shaker, piebaldFat-tailed gerbilPachyuromys duprasi GerbilGerbillus spp.Hamster (golden)Mesocricetus auratus ChinchillaChinchilla laniger CavyCavia aperea Hedgehog, African PygmyErinaceus albiventris ChickenGallus gallus Var.PigeonColumia livia Var.Any Turkey speciesSubfamily Meleagridinae Any Pheasant, Junglefowl orSubfamily Phasianinae Coturnix speciesAny Guineafowl speciesSubfamily Numidinae CanarySerinus canaria Var.Parrot, parakeet, cockatiel,Family Psittacidae macaw, and other members of the Family Psittacidae not prohibited by federal or international lawToucanFamily Ramphastidae

Any New World Quail speciesSubfamily Odontophorinae (including Bobwhite)MynahAcridotheres spp.Any Peafowl speciesPavo spp.Any duck, goose, swan, or other migratory waterfowl which the U.S. Fish and Wildlife Service determines does not require a federal permit for private ownershipChukar partridgeAlectoris chukarButton "quail"Family Turnicidae in the order Gruiformes Any nonvenomous reptileClass Reptilia (crocodile, alligator, snake, turtle, or lizard)Members of the bird families Fringillidae, Turdidae, Zosteripidae, Pycnonotidae, Timaliidae, and Ploceidae of non- Holarctic origin. Members of the bird families Columbidae and Trogonidae of non- nearctic origin.Elk (except feral and wild elk)(Cervus elaphus) Bison (except feral and wild bison)(Bison bison) Muskoxen (except feral and wild muskoxen)(Ovibos moschatus) EmuDromaius novaehollandiae

(c) The department may not issue a permit for the capture, possession, import, or export of any game animal, including a hybrid of a game animal and a species listed in (b) of this section, for use as a pet, except that a person that possessed a chimpanzee as a pet before January 31, 2010 may obtain a permit from the department before July 1, 2010, in order to maintain possession of the chimpanzee in this state. The propagation of chimpanzees is prohibited in this state.

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

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

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

(A) a person who can demonstrate ownership of the animal may pursue and capture the animal within 48 hours after the animal escapes from confinement, without needing to obtain a permit from the department;

(B) a person who can demonstrate ownership of the animal may pursue and capture the animal more than 48 hours after the animal escapes from confinement only if the person obtains a permit from the department;

(C) any free-ranging musk oxen, bison, reindeer, or elk for which ownership cannot be demonstrated is presumed to be game;

(D) for purposes of this paragraph, ownership of an animal can be demonstrated only by means of a clearly visible permanent brand, ear tag, or owner's mark on the body of the animal.

(e) Any of the above species of bird, mammal, or reptile that is endangered may not be held in private ownership without a permit from the United States Fish and Wildlife Service.

(f) Notwithstanding (b) of this section, the following species may be temporarily released for the purpose of hunting dog or falcon training, field trials, and tests:

(1) Pigeon (Columia livia Var.);

(2) Pheasant, Jungle Fowl, or Coturnix (Subfamily Phasianinae);

(3) any Guineafowl species (Subfamily Numidinae);

(4) any New World Quail species (including Colinus) (Subfamily Odontophorinae);

(5) any duck, goose, swan, or other migratory waterfowl which the U.S. Fish and Wildlife Service has determined does not require a federal permit for private ownership;

(6) Chukar Partridge (Alectoris chukar).

(g) A person using live game listed in (f) of this section for the purpose of hunting dog or falcon training, field trials, or tests

(1) may release the game only on the day of use and shall make reasonable efforts to capture, kill, or recover the temporarily released live game;

(2) may take the live game in connection with hunting dog or falcon training, field trial, and test activities; and

(3) must legally acquire, hold, and dispose of the live game in accordance with all other applicable state statutes and regulations.

(h) Upon application, the board will add a species to the list in (b) of this section if there is clear and convincing evidence that the species

(1) is not capable of surviving in the wild in Alaska;

(2) is not capable of causing a genetic alteration of a species that is indigenous to Alaska;

(3) is not capable of causing a significant reduction in the population of a species that is indigenous to Alaska;

(4) is not capable of transmitting a disease to a species that is indigenous to Alaska;

(5) does not otherwise present a threat to the health or population of a species that is indigenous to Alaska;

(6) is not captured from the wild for use as a pet;

(7) does not present a conservation concern in the species' native habitat outside of this state;

(8) can be reasonably maintained in good health in private ownership; and

(9) does not present a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences to captive animals.

(i) The board will remove a species from the list in (b) of this section, if there is a preponderance of evidence that the species

(1) is capable of surviving in the wild in Alaska;

(2) is capable of causing a genetic alteration of a species that is indigenous to Alaska;

(3) is capable of causing a significant reduction in the population of a species that is indigenous to Alaska;

(4) is capable of transmitting a disease to a species that is indigenous to Alaska;

(5) otherwise presents a threat to the health or population of a species that is indigenous to Alaska;

(6) is captured from the wild for use as a pet;

(7) presents a conservation concern in the species' native habitat outside of this state;

(8) cannot be reasonably maintained in good health in private ownership; or

(9) presents a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences to captive animals.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will move authority to determine which live game may be legally possessed from the board to the commissioner; the commissioner would be responsible for evaluating requests for additions to the clean list. Instead of submitting proposals to the board to request permission to possess an animal not currently on the clean list, the public would submit proposals to the

department. The department would then analyze each request and if it is determined an animal should be added to the list, the department would go through the process of updating the regulation accordingly.

Updating regulations outside of the board process is a lengthy process and requires strict adherence to the Administrative Procedures Act (APA). The APA requires adequate public notice and includes an opportunity for the public to comment on a proposed regulation. Proposed regulations must also be approved by the Governor's office and Department of Law before being signed into law. The process can take six months or more to complete. The lengthy process for adopting regulations, combined with the review of the proposed species, means changes will not occur quickly.

BACKGROUND: Decisions on updating species which may be possessed in Alaska without a permit from the department has been wholly within the board's authority. The board hears proposals for this regulation during statewide regulatory cycles which currently occur every three years. The board is able to delegate its authority to the department and has done so in a few other instances. It does this in the form of board findings. Most recently, in 2019 the board delegated authority to the Commissioner to adopt regulations for hunting and trapping allowing the use of electronic licenses, permits, and other documentation authorized by the department. Similarly, in 2015 the board delegated authority to the commissioner to handle petitions for emergency regulations. In both these instances, the board did this to expedite the process of timely addressing issues which would otherwise take considerable time if they needed to follow the regular board process and cycle.

Currently, the department analyzes and prepares recommendations for these types of proposals the same way that it does for all proposals. The process involves spending a substantial amount of time researching the requested species, its uses, and associated concerns (e.g., disease, ability to survive in Alaska's environment). This information is presented to the board with a recommendation to adopt or oppose the inclusion of a species in 5 AAC 92.029. These analyses are conducted in a neutral manner with a focus on scientific and safety issues. Many of the requests are largely to keep live game (as defined by 5 AAC 92.029) as pets. While many of the species in the regulation are pets there is great consideration given for livestock and other agricultural uses.

The department presents the data and information to the board and the board makes the final decision on inclusion of the species. It is common to have 5-6 proposals for 5 AAC 92.029 at each statewide meeting.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. If adopted, the department will develop a policy for receiving, processing, and decision making for requests to possess game animals. Adoption of this proposal is unlikely to increase the approval rate for live game animal possession because the department will use the same criteria as the board to assess requests.

COST ANALYSIS: Adoption of this proposal is not anticipated to result in additional cost to the department. However, if the department accepts applications/proposals annually rather than every three years, this will take staff time from other duties.

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PROPOSAL 148 – 5 AAC 92.110. 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.

PROPOSED BY: Kneeland Taylor

WHAT WOULD THE PROPOSAL DO? The proposal imposes certain conditions on the Commissioner's ability to implement an intensive management (IM) plan by adding the bold and underlined language below to the existing regulation.

Specifically, the proposal limits the department to being able to implement the plan only (i) when the commissioner finds that the board has found that consumptive use of the big game prey population is a preferred use and that depletion of the big game prey population or reduction of the productivity of the big game prey population has occurred and may result in a significant reduction in the allowable human harvest of the population; (ii) if the commissioner authorizes the use of aircraft and/or the take of wolves from aircraft the same day airborne that the objectives set for the population have not been achieved and that predation is an important cause for the failure to achieve the objectives set by the board and that a reduction of predation can reasonably be expected to aid in the achievement of the objectives or that a disease or parasite of a predator population is threatening the normal biological condition of the predator population or if left untreated, would spread to other populations; and (iii) before proceeding with implementing the plan, the department must publicly notice the determination and findings, and give the public the opportunity to comment.

(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 Procedure Act and may, by regulation, amend the plan to apply additional restrictions in light of circumstances existing at the time of implementation.

WHAT ARE THE CURRENT REGULATIONS?

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

...

(e) The Board of Game shall adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that

(1) consumptive use of the big game prey population is a preferred use;

(2) depletion of the big game prey population or reduction of the productivity of the big game prey population has occurred and may result in a significant reduction in the allowable human harvest of the population; and

(3) enhancement of abundance or productivity of the big game prey population is feasibly achievable utilizing recognized and prudent active management techniques.

(f) The Board of Game may not significantly reduce the taking of an identified big game prey population by adopting regulations relating to restrictions on harvest or access to the population, or to management of the population by customary adjustments in seasons, bag limits, open and closed areas, methods and means, or by other customary means authorized under (a) of this section, unless the board has adopted regulations, or has scheduled for adoption at the next regularly scheduled meeting of the board regulations, that provide for intensive management to increase the take of the population for human harvest consistent with (e) of this section. This subsection does not apply if the board

(1) determines that intensive management would be

(A) ineffective, based on scientific information;

(B) inappropriate due to land ownership patterns; or

(C) against the best interest of subsistence uses; or

(2) declares that a biological emergency exists and takes immediate action to protect or maintain the big game prey population in conjunction with the scheduling for adoption of those regulations that are necessary to implement (e) of this section.

Sec. 16.05.783. Same day airborne hunting. (a) A person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne. However, the Board of Game may authorize a predator control program as part of a game management plan that involves airborne or same day airborne shooting if the board has determined based on information provided by the department

(1) in regard to an identified big game prey population under AS 16.05.255(g) that objectives set by the board for the population have not been achieved and that predation is an important cause for the failure to achieve the objectives set by the board, and that a reduction of predation can reasonably be expected to aid in the achievement of the objectives; or

(2) that a disease or parasite of a predator population

(A) is threatening the normal biological condition of the predator population; or

(B) if left untreated, would spread to other populations.

(b) This section does not apply to

(1) a person who was airborne the same day if that person was airborne only on a regularly scheduled commercial flight; or

(2) an employee of the department who, as part of a game management program, is authorized to shoot or to assist in shooting wolf, wolverine, fox, or lynx on the same day that the employee has been airborne.

(c) A person who violates this section is guilty of a misdemeanor, and upon conviction is punishable by a fine of not more than $5,000, or by imprisonment for not more than one year, or by both. In addition, the court may order the aircraft and equipment used in or in aid of a violation of this section to be forfeited to the state.

(d) When the Board of Game authorizes a predator control program that includes airborne or same day airborne shooting, the board shall have the prerogative to establish predator reduction objectives and limits, methods and means to be employed, who is authorized to participate in the program, and the conditions for participation of individuals in the program.

(e) The use of state employees or state owned or chartered equipment, including helicopters, in a predator control program is prohibited without the approval of the commissioner.

(f) In this section,

(1) “free-ranging” means that the animal is wild and not caught in a trap or snare; and

(2) “game management program” means a program authorized by the Board of Game or the commissioner to achieve identified game management objectives in a designated geographic area.

5 AAC 92.110. Control of predation by wolves. (a) Notwithstanding any other provision in this title, the commissioner or the commissioner's designee may, in accordance with this section, and consistent with any applicable predation control implementation plan adopted by the board, conduct a wolf population reduction or wolf population regulation program. The commissioner or the commissioner's designee, including contracted agents of other governmental agencies, may reduce wolf populations in an efficient manner, by any means, but as safely and humanely as practical, including the use of a helicopter.

(b) Repealed 3/10/2006.

(c) Repealed 10/1/93.

(d) Repealed 3/10/2006.

(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 and may, by regulation, amend the plan to apply additional restrictions in light of circumstances existing at the time of implementation.

(f) If the board authorizes issuance of public aerial shooting permits or public land and shoot permits as a method of wolf removal, the commissioner may, at any time while the plan is in effect, implement land and shoot or aerial shooting by order of the department. A permit may be issued under 5 AAC 92.039. The department may monitor programs involving the use of aircraft from the air.

(g) To the extent practicable, a person taking wolf under a wolf population reduction or wolf population regulation program must retrieve the wolf so that maximum economic and scientific value may be realized from each wolf.

(h) Poison may not be used to take a wolf, except that carbon monoxide cartridges may be used to humanely euthanize wolf young in the den in areas under a predation control implementation plan.

(i) The killing of wolf young in the den, commonly known as "denning", is prohibited, unless the commissioner authorizes the killing of wolf young in the den in areas under a predation control implementation plan.

(j) Repealed 5/16/2010.

(k) The commissioner shall stop the taking of wolves under the implementation plan and, if necessary, stop other taking in the affected area for the remainder of the regulatory year, when plan objectives adopted by the board for that area have been reached for that year.

(l) This section applies only to a specific program designed to reduce or regulate wolf populations for the purpose of managing wild prey populations. This section does not apply to other responsibilities of the commissioner, such as activities relating to

(1) animal propagation;

(2) scientific studies;

(3) stocking conducted under AS 16.05.050;

(4) issuance of permits for collection of animals under AS 16.05.340(b);

(5) the isolated taking of animals necessary for immediate protection of wildlife populations or the general public or property under AS 16.05.020; or

(6) issuance of any other department permits authorized by state or federal law.

(m) A wolf population reduction or wolf population regulation program established under this section is independent of, and does not apply to, hunting and trapping authorized in 5 AAC 84 - 5 AAC 85.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the department will need to take additional steps prior to implementing IM plans, some of which are duplicative or conflict with current regulations.

If adopted, there will be conflicting regulations for the department to follow. All the existing IM objectives for caribou and moose IM populations are a range and most of the IM plans instruct the department to manage for the midpoint of the objectives. Current regulations allow maximum flexibility for the department to implement IM to keep both the harvest and population within the range of objectives set by the board. This proposed regulation conflicts with the existing regulations that instruct the department to manage within those ranges.

The proposal would also require the department to publicly notice for comment when the department intends to implement aerial wolf control. This aspect may impact the timeliness of implementing an IM program.

Adoption of the second part of the proposal is only applicable to IM plans where wolves are the specified predator species, and is not applicable to IM plans that include bears.

BACKGROUND: Currently, the department looks to existing regulations at 5 AAC 92.108 to confirm that the board has found that consumptive use of the big game prey population is a preferred use and that depletion of the big game prey population or reduction of the productivity

of the big game prey population has occurred and may result in a significant reduction in the allowable human harvest of the population.

AS 16.05.255(e) instructs the board to adopt regulations to provide for IM programs to restore the abundance or productivity of big game prey populations that have been identified as necessary to achieve human consumptive use goals set by the board. The board identifies those populations and sets both population and harvest objectives in 5 AAC 92.108. Managing large populations intended to provide high levels of harvest for an exact number is impossible. Therefore, the board has set a range for both the population and harvest objectives and, in most regulations, instructed the department to manage for the midpoint of those objectives. IM population status impacts allowable uses of the population including whether nonresident harvest is appropriate, authorized methods and means for hunting (separate from control), and the guiding provisions allowed for predator populations in active IM areas (AS 08.54.750(e)). The ability of the department to implement control programs based on the midpoint of the range gives the department the ability to manage based on the most current population and harvest data. It also gives the public the greatest opportunity to know what the applicable regulations are at any given time in each area.

The Administrative Procedure Act (APA) and the requirements for public notice and comment periods are only applicable to the development of regulations.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The department has been tasked by the legislature, in statute, to intensively manage populations for high levels of human consumptive use. The current process of renewing intensive management plans, when the population is within objectives, allows the department the ability to implement IM without having to submit a proposal to the board outside of the regular cycle of board meetings for regions. It appears the proponent wants the department to let the plans expire until the IM prey populations are below objectives, at which point the department would need to submit a proposal or possibly an Agenda Change Request out of cycle to establish the regulations to allow the department to implement IM. This could diminish the effectiveness of the IM process, jeopardizing the department's ability to meet its statutory mandate by taking valuable time which would negatively impact the prey population and result in an avoidably lengthy rebound period. Current regulations allow the department the ability to implement IM as needed, as the legislature intended. The department's day-to-day management of wildlife and administration of regulations adopted by the board are not subject to the Administrative Procedure Act. The department publishes feasibility studies on its website related to predator control programs, along with a host of other information, to make such information available to the public.

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

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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.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal updates the regulations listing advisory committee jurisdiction for authorizing antlerless moose seasons by adding the Nushagak AC to Unit 17B, and the Togiak AC to Unit 17C. Additionally, the proposal moves the Stony/Holitna AC from the Western Region to the Interior Region

WHAT ARE THE CURRENT REGULATIONS?

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):

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

…

(4) in the Western Region

…

(B) Unit 19: Central Kuskokwim, Stony/Holitna

…

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

…

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, there will be little effect as the changes are mostly housekeeping, and because there are currently no antlerless moose hunts in Subunits 17B and 17C. However, if an antlerless moose seasons needed to be established in these subunits, AC authorization would be required by Nushagak AC for Subunit 17B, and both the Nushagak and Togiak ACs would be required for Subunit 17C.

BACKGROUND: The Nushagak and Togiak ACs have designated seats for communities located in Subunits 17B and 17C as described in the proposal. These ACs were inadvertently excluded from the list of ACs for those subunits in regulation. The Stony/Holitna AC is being moved from the Western Region to the Interior Region to align with regulatory changes made by the Joint Board of Fisheries and Game in 2019.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

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

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PROPOSAL 150 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the resident grizzly/brown bear tag fee exemptions for the 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)

PROPOSED BY: The Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would reauthorize the current resident tag fee exemptions for brown/grizzly bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

WHAT ARE THE CURRENT REGULATIONS? Brown/grizzly bear tag fees and locking tags are not required for residents in Units 12, 19, 20, 21, 24, 25, 26B, and 26C. The customary and traditional use findings and amounts reasonably necessary for subsistence are presented below:

Customary and traditional use findings, and Amounts Reasonably Necessary for Subsistence Uses, brown bear populations, Region III (5 AAC 99.025 (3)):

Unit	Finding	Amount reasonably necessary for subsistence
Unit 12	Negative	
Units 19A and 19B upstream of and excluding the Aniak River drainage, and Unit 19D	Positive	10–15
Units 19A and 19B downstream of and including the Aniak River drainage	Positive	5
Unit 19C	Negative	
Unit 19D	Positive	2–6
Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Use Area and Unit 20C	Positive	1–3

Unit 20D, outside the boundaries of the Fairbanks Nonsubsistence Area	Positive	1–2
Unit 20E	Negative	
Units 21 and 22	Positive	20–25
Units 23, 24, and 26	Positive	25–35
Unit 25A, 25B, 25C	Negative	
Unit 25D	Positive	

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The $25 resident tag fee exemption would be continued for brown/grizzly bear hunts in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

BACKGROUND The Board of Game must annually reauthorize all resident tag fee exemptions. Resident brown bear tag fees were put in place statewide during the mid-1970s to discourage incidental harvest, elevate the status of brown bears to trophies, and to provide revenue. Today, Region III populations are abundant, and brown bears continue to be highly regarded as trophies. Across the region, season dates and bag limits effectively regulate harvest in areas where interest is high.

Eliminating all resident brown bear tag fees throughout Region III simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these brown bear populations. 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. Reauthorizing these tag fee exemptions would allow residents who are unable to purchase the $25 tag before hunting, due to lack of vendors or economic reasons, to legally harvest brown bears. During regulatory years 2015–2023 approximately 24% of brown bears harvested by resident hunters in Region III were taken incidentally to other activities, compared with 9% statewide.

Human-caused mortality of brown/grizzly bears in most areas of Region III is quite low and is assumed to be less than 6% of the population, which is a rate that is sustainable under most ecological circumstances. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed through changes in seasons and bag limits. The presence or absence of tag fees does not appear to have a significant influence on harvest in these areas.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Brown bear numbers appear to be stable in Interior and Northeast Alaska. Resident tag fees that were in place prior to 2010 appeared to have had no effect on regional harvest. Therefore, this proposal does not present a biological concern. As part of this proposal to reauthorize the exemption of resident brown bear tag fees throughout Region III, we recommend that the board, at a minimum, continue to reauthorize the tag fee exemptions for subsistence registration permit

hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

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

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PROPOSAL 151 –5 AAC 92.015 Brown bear tag fee exemptions. Reauthorize the brown bear tag fee exemption for Units 18, 22, 23, and 26A.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? The proposal would reauthorize the resident tag fee exemptions for brown bears for Units 18, 22, 23, and 26A.

WHAT ARE THE CURRENT REGULATIONS? Brown bear tag fees are not required for residents in drawing, registration, or subsistence permits hunts in Units 18, 22, 23, and 26A.

Below are the C&T findings and ANSs for subsistence uses for brown bears in Units 18, 21, 22, 23, 24, and 26:

Game Management Unit	Finding	Amounts Reasonably Necessary
Unit 18	Positive	20-30
Units 21 and 22	Positive	20-25
Units 23, 24, 26	Positive	25-35

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Resident hunters would not be required to purchase a resident locking tag for general season, drawing or registration permit brown bear hunts in Units 18, 22, 23 and 26A. Hunters participating in subsistence registration permit hunts would also not be required to purchase a brown bear locking tag to harvest a bear, although possession of the subsistence registration permit would be required.

BACKGROUND: The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. Brown bear general season, drawing, and registration permit hunts have had the tag fees exempted in Unit 18 and 26A for 11 years, in Unit 22 for 21 years, and in Unit 23 for 16 years. Exemptions have been implemented to allow: 1) incremental increases in harvest; 2) additional opportunity for residents; and 3) harvest for a wide range of uses. Current harvest levels in each of the Units are appropriate based on sealing and anecdotal information. Previous exemptions of resident tag fees have not caused dramatic or unexpected increases in overall harvest.

In subsistence brown bear registration permit hunts, reauthorizations are needed for Unit 18, 22, 23 and 26A where requirements include: 1) a registration permit; 2) a tag fee exemption; 3) salvage of 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 the subsistence registration permit hunt area; 6) if sealing is required, the skin of the head and the front claws must be removed and retained by the department at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by the department for subsistence registration permit hunts. In all units, subsistence brown bear registration permit harvest rates are low and believed to be appropriate based on harvest reports; exempting the resident tag fee has not caused an increase in subsistence harvest.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Brown bear numbers in the identified units are stable or increasing and the increased harvests that result from the tag fee exemption do not present a conservation concern.

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

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PROPOSAL 152 – 5 AAC 085.045(a)(4) Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 6C.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Adoption of this proposal would ensure that the department has the necessary tools to manage the Unit 6C moose population within objectives.

WHAT ARE THE CURRENT REGULATIONS?

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
…		
Unit 6(C)	Sept. 1–Oct. 31 (General hunt only)	No open season
1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued		
1 moose by registration permit only	Nov. 1–Dec. 31	No open season
...		

The board has made a negative customary and traditional use finding for moose in all of Unit 6.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes antlerless hunts in Unit 6C as required by statute. Resident hunters would be able to continue to harvest antlerless moose during hunts administered by ADF&G on state-managed lands in Unit 6.

BACKGROUND: Antlerless moose seasons must be reauthorized annually. The population objective is 600–800 moose. A population survey completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. This population is aggressively harvested to maintain within population objectives. We have managed this hunt cooperatively with the U. S. Forest Service and the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season. We have not held the state antlerless hunt since the 1999–2000 season. In 2013, a registration hunt was established that could be used to harvest moose, including antlerless, if the federal subsistence hunt is not held or it does not result in the desired amount of harvest. At this time, quotas have been adjusted on both the federal and state side to bring the population to within its objectives. Continuation of the antlerless hunts is necessary to achieve population objectives.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to reauthorize antlerless harvests in Unit 6.

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

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PROPOSAL 153– 5 AAC 85.045 (5). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Units 7 and 14(C).

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C).

WHAT ARE THE CURRENT REGULATIONS? The current regulations are:

Units 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

…

Units 7 and 14C are located entirely within the Anchorage-Matsu-Kenai Nonsubsistence Area. Unit 7 has a negative intensive management finding, and Unit 14C has a positive intensive management finding with a population objective of 1,500-1,800 moose, and a harvest objective of 90-270 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Antlerless moose seasons must be reauthorized annually. 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 a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. The moose population will be healthier and more productive due to decreased stress levels associated with winter food shortages.

BACKGROUND: The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters, and sharp reductions during severe winters. The number of permits issued (Table 153-1) depends on the current population estimate and bull:cow ratios,

while accounting for 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. This is a slight decrease in overall numbers, but an increase in the calf:cow ratio when compared to the December 2021 count, which found 185 moose with a bull:cow ratio of 36 bulls per 100 cows and a calf:cow ratio of 19 calves per 100 cows. Permit numbers were increased in 2022 to reduce the number of moose in these valleys since they are susceptible to sharp declines during severe winters when the population is too high. Since 2016, harvest and roadkill numbers have also remained relatively steady.

Table 153-1. Moose harvest in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C), regulatory years 2020-2023.

Regulatory Year	Bull Permits	Antlerless Permits	Bulls Harvested	Cows Harvested
2020	30	30	15	11
2021	30	30	14	9
2022	40	35	17	12
2023	40	35	19	8

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to maintain antlerless hunts in Units 7 and 14(C). These hunts have been successful in creating additional moose hunting opportunities with little or no controversy. In addition, the harvest of antlerless moose has helped achieve the Department's goal of maintaining moose numbers at a level to avoid die-offs during harsh winters.

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

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PROPOSAL 154– 5 AAC 85.045 (12). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 14(C).

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Reauthorize the antlerless moose seasons in Unit 14(C).

WHAT ARE THE CURRENT REGULATIONS? The current regulations are:

	Resident Open Season (Subsistence and	Nonresident

Units and Bag Limits	General Hunts)	Open Season
(12)		
…		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area 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	Sept 1—Mar 31 (General hunt only)	Sept 1—Mar 31
Unit 14(C), that portion known as the Birchwood Management Area 1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
Unit 14(C), that portion known as the Anchorage Management Area 1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued	Sept. 1—Nov. 30 (General hunt only)	No open season
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 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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
1 bull by drawing permit only, by bow and arrow only; up to 10 permits may be issued	Oct. 20—Nov. 15	No open season

…

Unit 14C is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence Area. Unit 14C also has a positive intensive management finding with a population objective of 1,500-1,800 moose, and a harvest objective of 90-270 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Adoption of this proposal is necessary for antlerless hunts in Unit 14(C) to continue. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14(C) at a population level low enough to reduce conflicts with residents, over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. At this level, the moose population will be healthier due to decreased stress levels associated with winter food shortages.

BACKGROUND: A combined 2023 aerial composition count of the JBER Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14(C)) 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 we have received fewer reports of human-moose conflicts and moose-vehicle collisions.

Antlerless moose hunts must be reauthorized annually. The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality.

Table 154-1. Cow moose harvest in Unit 14(C), regulatory years 2020–2023.

Regulatory Year	Either Sex Permits	Antlerless Permits	Cows Harvested
2020	50	26	24
2021	50	26	24
2022	50	26	32
2023	50	26	32

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to reauthorize antlerless hunts in Unit 14(C). These hunts have been successful in providing additional moose hunting opportunities in the State's largest human population center with little controversy while providing additional food security. In addition, the harvest of antlerless moose has helped achieve the Department's goal of maintaining moose numbers at a level that minimizes conflicts, moose-vehicle collisions, and winter die-offs, while still maintaining hunting opportunity.

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

****

PROPOSAL 155 – 5 AAC 85.045(a)(13) Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose season on Kalgin Island in Unit 15B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the antlerless moose hunt for Kalgin Island in Unit 15B.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 85.045 are:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(13)		
…		
Unit 15(B), Kalgin Island		

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

There is a negative IM finding for moose in Unit 15B.

There is a positive C&T finding for moose in Unit 15B (Kalgin Island) with ANS of two moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The antlerless moose season for Kalgin Island (RM572) in Unit 15B would be reauthorized. This hunt will help to maintain moose populations within sustainable levels on Kalgin Island, provide subsistence opportunity, maximize other harvest opportunity, and decrease the chance of high winterkill due to a lack of suitable forage.

BACKGROUND: Antlerless moose hunts must be reauthorized annually by the board. 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 of 20-40 moose.

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 (November 2024), department staff counted 103 moose on Kalgin Island. In the last 5 years, an average of 109 permits were issued for this hunt; of which 78 permittees hunted, yielding an average annual harvest of 25 moose. Harvest tracks hunter effort, and although effort and harvest have declined in recent years, success rate has remained high with a 5-year average of 32%.

The "any moose" registration hunt is recommended to reduce moose numbers 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 likely minimize the danger of overharvest. Additionally, if needed, the department can manage this permit hunt in-season, allowing for a change in the number of permits provided or closure of the hunt.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. This hunt helps to control the moose population on Kalgin Island to keep it within sustainable limits and provides additional harvest opportunity.

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

****

PROPOSAL 156 – 5 AAC 85.045(a)(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 in 15C (DM549) and the targeted hunt (AM550).

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the antlerless moose hunt for the Homer Bench and the targeted antlerless hunt along the Sterling Highway in Unit 15C.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 85.045 are:

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 accompanied 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 accompanied 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

There IM population objective for moose in Unit 15C is 2,500-3,500 and the IM harvest objective is 200-350 moose.

These hunts are within the Anchorage-Matsu-Kenai Peninsula Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The antlerless moose season within 15C (DM549) and the targeted hunt (AM550) along the Sterling Highway in 15C would be reauthorized for the 2025–2026 hunting season. This harvest may help minimize human–moose conflicts and winter kill deaths of moose due to limited habitat.

BACKGROUND: Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorization of the 15C cow hunt (DM549) for the 2025–26 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 5,522 moose (95% CI: range 4,435–6,608), of which 20% (95% CI: 14–26%) were calves. Late winter spatial distribution of moose within the GSPE survey area was heavily skewed away from elevations > 1000 feet and resulted in high density of moose in some grid cells inflating population estimates. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be above the upper end of the Intensive Management population objective of 3,500 moose. Population projections derived from a collared sample of moose estimating survival and fecundity indicate a population abundance of roughly 4,300 moose. Both estimates of abundance in 15C in 2023 indicate the population is likely above the upper end of intensive management population objective of 3,500 moose. Fall 2024 composition counts in core count areas provided a bull ratio of 30 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.

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 26 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, 65 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.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Local residents are in favor of a limited antlerless moose harvest that provides additional opportunity and helps to limit habitat degradation and wildlife conflicts. Antlerless hunts are a useful tool to aid in achieving harvest objectives as set by the board.

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

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PROPOSAL 157 - 5 AAC 85.045 Hunting season and bag limits for moose. Reauthorize the antlerless moose seasons in Remainder of Unit 18.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the resident and nonresident antlerless moose season in the portion of Unit 18 that drains into Kuskokwim Bay south of the Carter Bay drainage and in the remainder of Unit 18.

WHAT ARE THE CURRENT REGULATIONS? Antlerless hunting during the winter seasons is allowed for resident hunters the portion of Unit 18 that drains into Kuskokwim Bay south of the Carter Bay drainage in a "may be announced" season in the month of January. The season timing and length depend on the winter travel conditions and how many moose are left from the fall quota.

Antlerless hunting during fall and winter seasons is allowed for resident hunters in the "Remainder of Unit 18". There are three components to antlerless seasons:

1) during August 1–September 30 the bag limit is 3 moose; however, only one antlered bull may be taken and taking calves or cows accompanied by calves is prohibited;

2) during October 1–November 30 the bag limit is 3 antlerless moose with no additional restrictions; and

3) during December 1–April 30 the bag limit is 23 moose with no additional restrictions.

In the January 2024 meeting the BOG authorized a new drawing hunt for antlerless moose in the Kuskokwim hunt area. The hunt is open to residents only, and up to 100 permits may be issued.

There is a positive C&T finding for moose in Unit 18, and an ANS of 200–400.

Antlerless moose hunting is also allowed for nonresident hunters in Unit 18 remainder. The current season for nonresidents is December 1- March 15 and the bag limit is one antlerless moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The antlerless hunts in the areas south of the Carter Bay drainage, the Kuskokwim Hunt area, and the remainder of Unit 18 would be reauthorized for RY2025. Hunters would have the same seasons and bag limits as RY2024 (see Current Regulations above).

BACKGROUND: Antlerless moose seasons must be reauthorized annually. Both hunt areas support a large moose population, reaching a conservative estimated minimum population of 24,000 moose. In all areas surveyed, moose populations had twinning rates of 22-46% in 2022.

Harvests by residents in RY2023 (n=460) is very close to the previous 3-year average harvest (n=453). In RY2023, the harvest ticket reports from the remainder of Unit 18 included 142 cows taken, along with the harvest of 318 bull moose. The combined harvest for the remainder of Unit 18 represented in this reauthorization is well within sustained yield, and the population trajectory has not been affected by antlerless harvests.

RY2017 was the first year for antlerless hunts for nonresidents. A total of 5 cow moose have been harvested by non-residents in Unit 18, 2 moose in 2020, 2 moose in 2022 and one in 2023. We expect nonresident harvest to remain low during the antlerless season.

Five antlerless moose (3 Cow, 2 Bull) have been reported harvested in the Goodnews hunt area since 2019.

Continuing antlerless moose harvest opportunity will benefit hunters and may also help slow the growth rate of the population.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to maintain antlerless hunts in areas where moose populations are increasing.

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

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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.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the fall antlerless moose hunt and the winter antlerless moose hunt.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 5AAC 85.045(a)(17) are:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		

…		
Unit 19(D) upstream of the Selatna River,		
1 cow by draw 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
…		

There is a positive customary and traditional use finding for moose in Unit 19, outside of the Lime Village Management Area. The amount reasonably necessary for subsistence is 400 to 700 moose, including 175 to 300 moose in Unit 19(A), and 20 to 24 moose in Unit 19(B).

Unit 19D-East has a positive Intensive Management (IM) finding with a population objective of 3,000 - 3,500 and a harvest objective of 400 - 600.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would: 1) reauthorize the winter hunt in Unit 19D upstream of the Selatna River allowing hunters to harvest antlerless moose, and 2) authorize a limited draw fall antlerless moose opportunity in Unit 19D upstream of the Selatna River.

BACKGROUND: 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 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

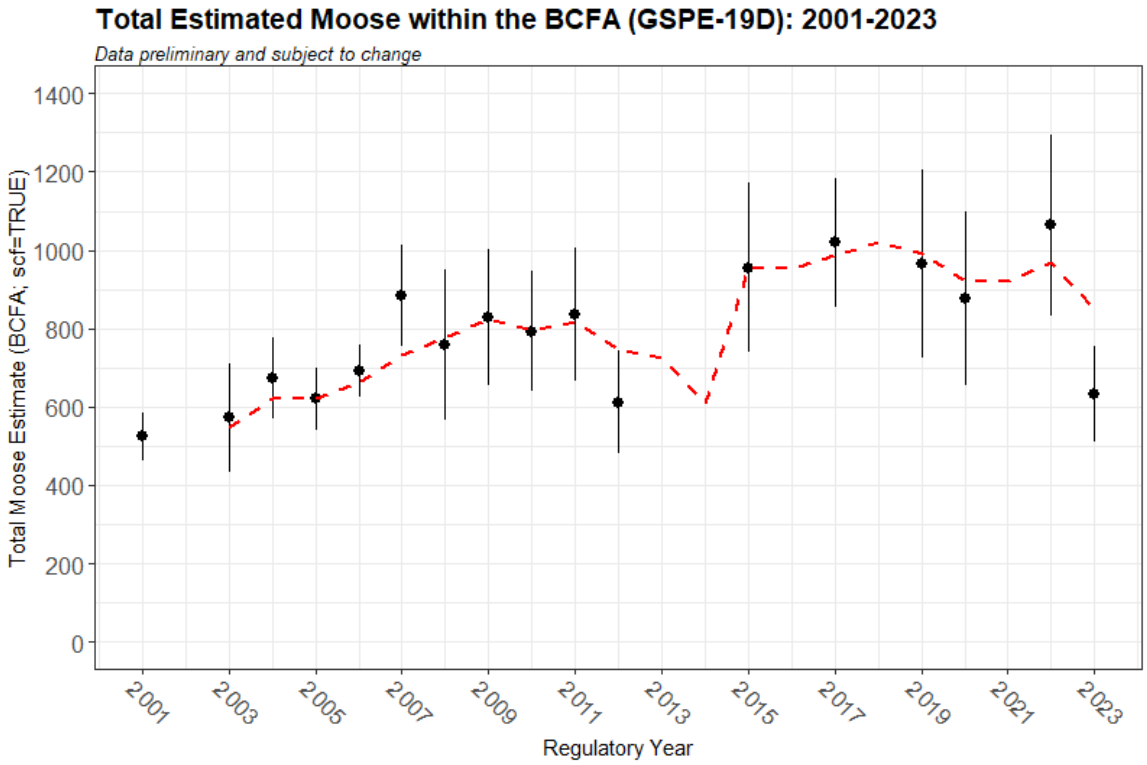

Figure 2. GSPE population estimate within the Bear Control Focal Area (BCFA) using a sightability correction factor for GMU 19D 2001-2023. Points and vertical lines indicate annual population estimates and 90% Confidence Intervals. The dashed red line is the 3-year moving average of the GSPE point estimate.

hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The moose population in the eastern portion of Unit 19D approximately doubled since predator removals began in 2003 before declining after four consecutive years of very deep snow (Winters 2019/2020 through 2022/2023; Figure 1). Prior to intensive management, bull-to-cow ratios along the Kuskokwim River drainage were measured at 18 bulls per 100 cows. After predator reductions and a closure of moose hunting in the Bear Control Focus Area (BCFA), ratios improved to 39 bulls per 100 cows by 2007. After hunting in the BCFA reopened, bull-to-cow ratios declined and the current (2023) 2-year average is 25 bulls per 100 cows (Figure 2).

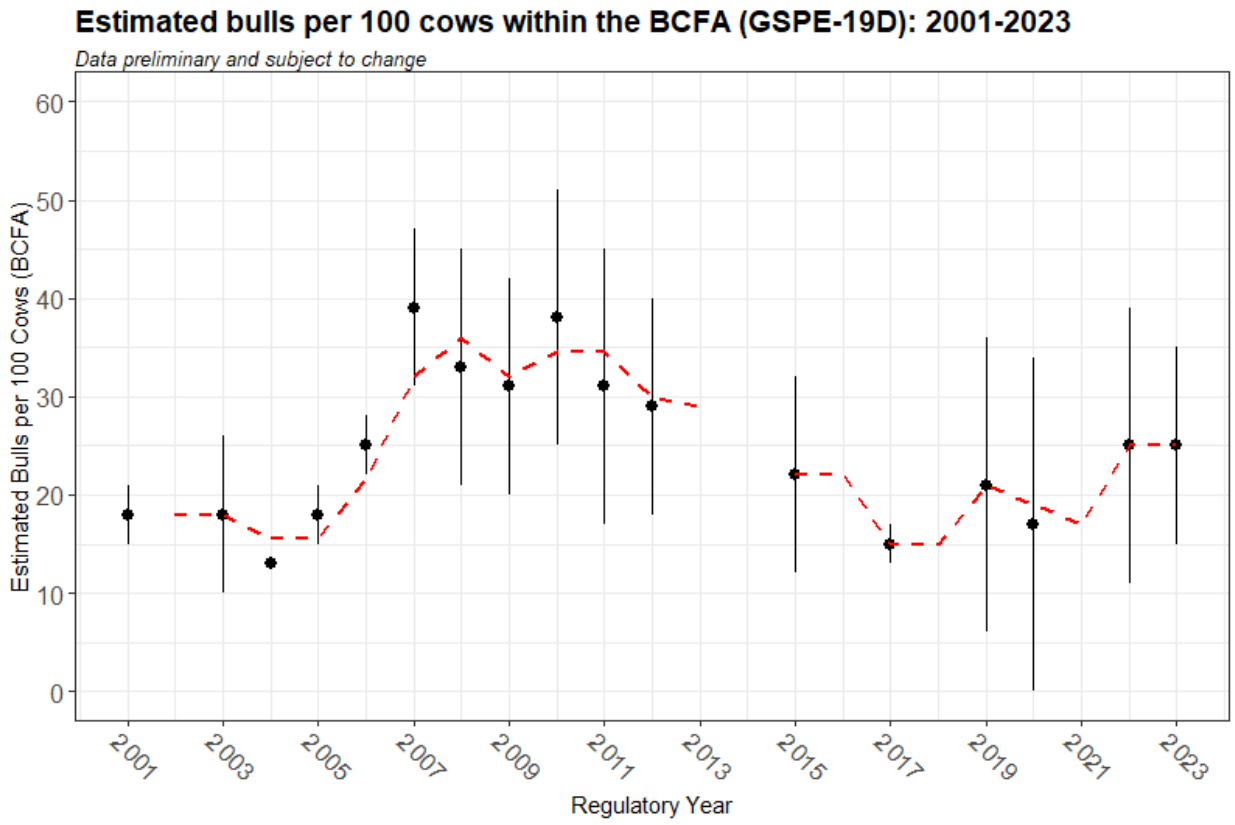

Figure 2. Bull-to-cow ratios within the Bear Control Focal Area (BCFA) derived from GPSE surveys in GMU 19D 2001-2023. Points and vertical lines indicate annual estimate ratios and 90% Confidence Intervals. The dashed red line is the 2-year moving average of bull-to-cow ratio point estimates.

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 GSPE in the BCFA we documented a decline from 2,471 moose (2.2 moose/mi^2) to 1,591 moose (1.4 moose/mi^2). Due to this decline the department closed the winter hunt in RY23 by emergency order. Proposal 66, which was passed by the board in March 2024, authorized a new draw permit hunt in the fall for cows in a portion of Unit 19D. This proposal was submitted by the McGrath AC prior to the documented decline of moose. While the department did not issue antlerless permits in RY24 in Unit 19D, we would like to keep these hunts available as a tool to provide additional opportunity when it is again warranted.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Passage of this proposal will help to maintain or improve long-term habitat conditions and provide the department the flexibility to manage the moose population commensurate with habitat. Winter hunts distribute hunter pressure and allow access to areas that are inaccessible in the fall. Cow harvest allows hunters to harvest moose toward meeting the intensive management harvest objective without reducing bull-to-cow ratios to low levels.

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

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PROPOSAL 159– 5 AAC 85.045(18) Hunting seasons and bag limits for moose. Reauthorize the antlerless moose seasons in Unit 20A.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Reauthorize the antlerless moose hunting seasons in Unit 20A.

WHAT ARE THE CURRENT REGULATIONS? Antlerless moose hunts are available throughout Unit 20A.

In the Ferry Management Trail, Wood River Controlled Use, and the Yanert Controlled Use Areas antlerless moose hunts are as follows:

Residents:

- Drawing permit for one antlerless moose, August 15–November 15.
- Targeted hunt for one moose by permit (AM751) announced by emergency order.
- Registration permit for one antlerless moose; a person may not take a cow accompanied by a calf, Oct. 1–last day of February. These permits have not been issued for several years because desired harvest is achieved through drawing permits.

Nonresidents:

- No antlerless moose seasons

In the remainder of Unit 20A, antlerless moose hunts are as follows:

Residents:

- Drawing permit for one antlerless moose, August 15–November 15.
- Registration permit for one antlerless moose; a person may not take a cow accompanied by a calf, August 25–last day of February. In most areas of Unit 20A these permits have not been issued for several years because desired harvest is achieved through drawing permits.
- Registration permit, RM768, has been issued to provide reasonable opportunity to harvest antlerless moose for subsistence uses; this hunt occurs outside the Fairbanks Non-subsistence Area (FNA).

Nonresidents:

- No antlerless moose seasons

Hunts for bull moose are also available in Unit 20A. Refer to the *2024–2025 Alaska Hunting Regulations* for specific details about bull moose hunting seasons in Unit 20A.

The intensive management (IM) population objective for moose in Unit 20A is 10,000–15,000 moose and the IM harvest objective is 500–900 moose.

There is a positive C&T finding for moose in Unit 20A outside the boundaries of the FNA with an Amount Necessary for Subsistence of 50–75 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The Alaska Department of Fish and Game (department) will have the authority to administer antlerless hunts as a management tool to regulate the moose population in Unit 20A and to provide subsistence moose hunting opportunity outside the FNA and antlerless opportunity inside the FNA.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. Antlerless hunts help regulate population growth, provide subsistence hunters with a reasonable opportunity to harvest moose, and can reduce incidences of vehicle collision and other nuisance situations. Overall, the goal is to protect the health and habitat of the moose population over the long term and to provide for a wide range of public uses and benefits.

The department attempts to maintain the Unit 20A population within the IM population objective while monitoring nutritional status. The last two population surveys in 20A occurred in 2021 and 2022. The 2021 population estimate was 14,041 moose and the 2022 population estimate was 11,028 moose. These abundance estimates equate to 2.5 and 2.3 moose/mi^2 respectively. This moose population has been maintained at high densities for over 30 years, and continues to experience density-dependent effects, including low productivity and relatively light short-yearling female weights. Although sporadic signs of improvement in nutritional condition have been observed (i.e., higher twinning rates in portions of 20A and increases in male short-yearling weights compared to the late 1990s through early 2000s), no clear signals or significant trends have yet been detected. During the winter of 2021-2022 the department took a conservative approach to management and did not issue any antlerless moose permits in Unit 20A because of difficult snow and ice conditions that decreased the moose population. The department also did not issue antlerless permits for the fall 2023 or fall 2024 hunting seasons but will assess the population in the November of 2024 and decide if there is a harvestable surplus of antlerless moose for the fall of 2025.

DEPARTMENT COMMENTS: The department submitted and **SUPPORT**S this proposal because antlerless hunts are an important management tool in regulating this high-density, nutritionally stressed moose population. If antlerless moose hunts are not reauthorized, the department will lose the ability to regulate this moose population, IM harvest objectives may not be met, and the IM population objective may be exceeded. Additionally, the public will lose opportunity to harvest a surplus moose and subsistence hunters in the portion of Unit 20A

outside the FNA (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses. Although no antlerless moose permits are being issued in Unit 20A at this time having the ability to issue antlerless permits if and when there is a harvestable surplus of cow moose is valuable for managing this high density moose population.

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

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PROPOSAL 160 – 5 AAC 85.045(18). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 20B.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Reauthorize antlerless moose hunting seasons in Unit 20B.

WHAT ARE THE CURRENT REGULATIONS? Antlerless moose hunts are authorized in Unit 20B by drawing, registration, or targeted permit only, as follows:

Fairbanks Management Area, including Creamer's Field

Residents and nonresidents:

- 1 antlerless moose by drawing permit, by bow and arrow only, up to 150 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, September 1–November 27;
- 1 antlerless moose by muzzleloader by drawing permit, up to 10 permits, a recipient is prohibited from taking an antlered bull in the Fairbanks Management Area, Dec 1–January 31.

Fairbanks Management Area, outside of Creamer's Field

Residents only:

- 1 moose by targeted permit by shotgun, crossbow or bow and arrow only, up to 100 permits, season to be announced by emergency order

Minto Flats Management Area

Residents only:

- 1 antlerless moose by registration permit, October 15–February 28

Middle Fork of the Chena River drainage

Residents only:

- 1 antlerless moose by drawing permit, up to 300 permits, taking of calves or cows with calves is prohibited, August 15–November 15
- 1 antlerless moose by registration permit, taking of calves or cows with calves is prohibited, October 1–February 28

Southeast of the Moose Creek dike within ½ mile each side of the Richardson Highway

Residents only:

- 1 moose by drawing permit, by bow and arrow, crossbow, or muzzleloader, up to 100 permits, September 16–February 28
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order

Remainder of Unit 20B

Residents only:

- 1 antlerless moose by drawing permit, by youth hunt only, up to 200 permits, August 5–14;
- 1 antlerless moose by drawing permit, up to 1,500 permits, taking of cows with calves is prohibited, August 15–November 15
- 1 moose by targeted permit by shotgun, crossbow, or bow and arrow only, up to 100 permits, season to be announced by emergency order.

Hunts for bull moose are also available in Unit 20B. Refer to the *2024–2025 Alaska Hunting Regulations* for specific details about moose hunting seasons in Unit 20B.

There is a positive C&T finding for moose in Unit 20B, within the Minto Flats Management Area, with an ANS of 20–40 moose.

There is a positive C&T finding for moose in Unit 20B, outside the boundaries of the Minto Flats Management Area and outside the boundaries of the Fairbanks Nonsubsistence Area, with an ANS of 75–100 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Antlerless hunts will continue to be available to hunters, and the department will continue to have the ability to use antlerless hunts as a tool to regulate the moose populations.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The Department's goal in Unit 20B 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, provide hunting opportunity, help 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 hunts are not reauthorized, subsistence hunters in the portion of Unit 20B outside the Fairbanks Nonsubsistence Area may not have a reasonable opportunity to pursue moose for subsistence uses.

The department has administered multiple different antlerless hunts over the last 10 years in 20B. Currently the moose population is estimated to be below (7,848 moose 90% CI = 6,539-9,157) the Intensive Management objective of 12,000–15,000 moose, therefore the necessity for harvest is minimal and fewer hunts are offered at this time. The antlerless hunts that the Department is currently administering are as follows:

Fairbanks Management Area (FMA) – The purposes of these antlerless hunts are to regulate population growth in the FMA and potentially reduce moose–vehicle collisions and moose–human conflicts.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose–human conflicts continue to place significant demands on property owners. To increase hunting opportunity and harvest and to reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during Regulatory Year 1999 (RY99; that is, RY = 1 July 1999 through 30 June 2000) through RY10. Moose–vehicle collisions and moose–human conflicts declined during RY06–RY24, presumably, in part due to the consistent antlerless moose harvests during RY09–RY24.

Richardson Highway Hunt -The Richardson highway hunt is a drawing moose permit that allows hunters to hunt any moose ½ mile on either side of the Richardson highway with bow and arrow, muzzleloader or crossbow. The hunt is intended to reduce roadkill along the Richardson Highway.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with the harvest of antlerless moose taken under these regulations in these hunt areas; however, elimination of these hunts would create a biological concern. The Unit 20B moose population has potential for growth due to the extensive burns (i.e., increased productivity) and high survival rates. If antlerless moose hunts are not reauthorized, the moose population may exceed carrying capacity and would require population reduction. The department would like to continue to have the ability to regulate moose densities in response to habitat and population performance while providing opportunities to hunt antlerless moose and help meet IM harvest objectives.

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

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PROPOSAL 161 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose hunting season in Unit 20D.

PROPOSED BY: Alaska Department of Fish & Game

WHAT WOULD THE PROPOSAL DO? Reauthorize antlerless moose hunting seasons in Unit 20D.

WHAT ARE THE CURRENT REGULATIONS? Unit 20D currently has antlerless hunts available by drawing permit only, with fewer than 50 permits offered. Current antlerless moose seasons in Unit 20D are as follows:

Youth Hunt (YM763): youth (ages 10 to 17) residents only; one antlerless moose; however, a calf or cow accompanied by a calf may not be taken; September 16–25 in southwestern Unit 20D, including the Delta Junction Management Area and Bison Range Controlled Use Area.

Disabled Veteran/Purple Heart Recipient Hunt (DM795): qualified Purple Heart Recipient and 100% service-connected disability, resident and nonresident hunters; one moose every 4 years; however, a calf or cow accompanied by a calf may not be taken; September 1–15 within the Delta Junction Management Area

All antlerless hunts listed above occur in the Fairbanks Nonsubsistence Area (FNA). Additional antlerless hunts within 20D outside the FNA are not sustainable. In addition to these drawing hunts, registration hunts are retained in the codified regulation for the department to use in reducing or stabilizing the moose population in some areas of southern Unit 20D by increasing antlerless harvest. These hunts have not occurred since 2009.

Hunts for bull moose are also available in Unit 20D. Refer to the 2024–2025 Alaska Hunting Regulations for specific details about moose hunting seasons in this area.

Moose in that portion of Unit 20D that is north of the Tanana River and outside the boundaries of the Fairbanks Nonsubsistence Area have a positive C&T finding and an ANS of 5–15. Moose in that portion of 20D that is south of the Tanana River and outside of the boundaries of the Fairbanks Nonsubsistence Area (FNA) also have a positive C&T finding and an ANS of 5 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will allow antlerless hunts to continue to be available to the department and hunters, and the department will be able to use antlerless hunts as a tool to regulate the moose population. Antlerless hunts are an important tool for population regulation, and can mitigate the potential for sharp population declines by reducing range degradation.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The goals of Unit 20D antlerless hunts are to make progress toward achieving the board's intensive management (IM) harvest objective by harvesting cow moose from this highly accessible

population and to address concerns about range degradation, declines in nutritional indices, and reduced reproductive success by slowing moose population growth. It is important to manage this population for stability and a consistent harvestable surplus, rather than allow large population expansions and contractions, which can cause wide swings in the number of cow moose available for harvest.

These antlerless moose hunts are intended to improve or maintain moose habitat quality to support the current moose population. When appropriate, additional cow harvest could contribute to meeting Intensive Management (IM) harvest objectives. Moose populations will benefit by maintaining moose densities that are compatible with the carrying capacity of the habitat. Delta Junction residents and motorists may benefit from reduced moose–vehicle collisions and moose–human conflicts.

To maintain productive moose in adequate nutritional condition, department research (Boertje et al. 2007) indicates that 10-month-old calves should weigh at least 385 pounds and the population should not be allowed to grow when the 2-year average twinning rate is 11–20%. In 2019, 10-month-old calf weights in Unit 20D remain under 385 pounds (20D avg weight = 368 pounds). The Unit 20D 2-year twinning rate of 18%. While this number is steadily increasing a small antlerless harvest is still necessary to maintain this stability. The department will continue to monitor these biological metrics, as well as other density-dependent indices of nutritional condition.

The department will issue antlerless moose permits as needed to maintain a stable moose population with the goal of improving moose nutritional condition in Unit 20D. We anticipate issuing fewer than 20 drawing permits for antlerless moose in RY25. During RY17–RY20 we issued an average of 30 drawing permits in Unit 20D where the bag limit included antlerless moose, with an average harvest of 19 females (7% of the total 20D harvest). In RY21 46 drawing permits were issued in Unit 20D which included antlerless moose as part of the bag limit and 28 females were harvested. All antlerless hunts were canceled for RY22 as a result of the 2021–2022 winter and no antlerless permits were awarded for RY23. The department issued 10 YM763 permits for RY24 and 6 DM795 permits, however antlerless harvest under a DM795 permit rarely occurs. Permit numbers will be very similar to RY24 in RY25.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with harvest of antlerless moose taken under these regulations in these hunt areas. However, there are biological concerns regarding habitat degradation, reduced nutritional condition, and reduced reproductive success if antlerless hunts are eliminated and the population is allowed to grow. The Unit 20D moose population has potential for growth due to extensive agricultural lands, wildland fire footprints, and high predator harvest. If antlerless moose hunts are not reauthorized, the moose population may quickly exceed carrying capacity. These hunts maintain the opportunity to hunt a harvestable surplus of cow moose and help to meet IM harvest objectives.

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

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PROPOSAL 162 - 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose seasons in Unit 20E.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the antlerless moose hunting seasons in Unit 20E.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.045(18)

Units and Bag Limits (18)	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
…		
Unit 20(E), that portion within the Ladue River Controlled Use Area including the East Fork of the Dennison but excluding the remaining portion of the Dennison Fork of the Fortymile River and Excluding that portion within the Ladue River drainage upstream of the South Fork of the Ladue River		
…		
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 Unit 20(E), that portion outside of the Ladue River Controlled Use Area 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.		Aug. 5-Sept.5 Oct. 15-Nov. 30
…		
RESIDENT HUNTERS		
…		

1 antlerless moose by Aug. 5–Sept. 5 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

There is a positive customary and traditional use finding for moose in Unit 20E. The Amount Reasonably Necessary for Subsistence (ANS) is 50–75 moose.

The board has identified 20E moose as an important species for consumptive uses, with a population objective of 8,000 – 10,000 moose and a harvest objective of 250 – 500.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The Alaska Department of Fish and Game (department) will have the authority to use antlerless hunts as a management tool to regulate the moose population in Unit 20E and to provide subsistence moose hunting opportunity.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The unit 20E antlerless moose hunts allow the department to moderate population growth and address habitat concerns while providing subsistence hunting opportunities pursuant to IM harvest objectives. Protracted maintenance of moose population size and protection of their habitat allows the state to provide

sustainable access to a valuable wildlife resource while satisfying multiple-use demands. To do so, the department regularly monitors moose populations in 20E and employs a structured decision-making framework for the initiation of antlerless harvest, which incorporates population trends, bull:cow ratios, and nutritional indices (i.e. twinning and browse removal rates).

The moose population along the Taylor highway has fluctuated significantly over the past several decades, starting around 1275 in 2005, climbing through the 2010s to peak around 3040 in 2018, and dropping back to 2047 in 2023 after a series of harsh winters. These abundance estimates roughly equate to 0.6, 1.4, and 0.9 moose/mi^2, respectively. Bull:cow ratios appear to be stable above the minimum management objectives, and nutritional objectives are being met, with current twinning rates observed at 35% (2022-2024, 3-year weighted average). Browse removal rates are below the rate observed in nutritionally stressed populations. With all indices pointing towards a healthy population (despite the recent decline), the department does not plan to enact antlerless hunts during RY25 but would like to retain the hunts as a proactive management tool to rapidly respond to changes in nutrition and reduce population growth rates to maintain the current high nutritional levels.

The board has identified 20E moose as an important species for consumptive uses, establishing a population objective of 2,000 - 10,000 animals capable of sustaining a harvest of 250 - 500 moose per year (RY21–RY24 annual average unit-wide reported harvest was 163 moose, significantly below harvest objectives). The current Unit 20E moose harvest is below IM harvest objectives. Antlerless harvest would help achieve IM harvest objectives without reducing bull:cow ratios below management objectives.

DEPARTMENT COMMENTS: The department submitted and **SUPPORT**S this proposal. As a management tool, antlerless hunts provide an additional option for population adjustment and habitat protection. Additionally, they can help achieve IM harvest objectives without reducing bull:cow ratios below management objectives Without reauthorization, expedient responses to population changes may be substantially hindered. Given the current stable population trend and bull:cow ratios and healthy nutritionally indices, the department does not plan to enact antlerless hunts during RY24 but would like to retain the hunts as a proactive management tool.

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

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PROPOSAL 163 – 5 AAC 85.045 (a)(19). Reauthorize a winter any-moose season in a portion of Unit 21D. Reauthorize the antlerless moose hunting season in a portion of Unit 21D.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal will reauthorize a 15-day RM831 registration any-moose season to be announced during March in a portion of Unit 21D. The season has a harvest quota established by the department prior to the beginning of the season,

and if the total harvest or harvest of cows reaches the quota, the season will be closed by emergency order.

WHAT ARE THE CURRENT REGULATIONS? The RM831 any-moose season is announced by emergency order in March when conditions allow for good success in harvesting moose and closed after 15 days or once the quota is reached.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(a)		
(19)		
…		
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 bull, by registration permit only; or	Aug. 22–Aug. 31 Sept. 5–Sept. 25	
1 bull by drawing permit only; up to 600 permits may be issued in combination with Unit 21(D) remainder; or	Sept. 5–Sept. 25	
1 moose, by registration permit only, up to 15 days during March, however, a person may not take a cow accompanied by a calf	(Winter season to be announced)	
NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by drawing permit only; up to 600 permits may be issued in combination with Unit 21(D) remainder		Sept. 5–Sept. 25

…

The board made a positive customary and traditional use finding (C&T) for moose all of Unit 21 with an established Amount Reasonably Necessary for Subsistence (ANS) of 600–800 moose.

The board has identified 21D moose as an important species for consumptive uses, with a population objective of 7,000-10,000 moose and a harvest objective of 450-1,000 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would continue to allow harvest of a few antlered bulls, antlerless bulls, and cows in March when conditions allow for good success in harvesting moose. Because so few bulls have antlers during March, an any-moose season will have greater success rates than a bulls-only hunt and it will eliminate the need for hunters to make legal-animal determinations. This hunt will provide an opportunity to utilize the current harvestable surplus of cows and bulls, while ensuring overharvest of cows does not occur because of the annual harvest quota.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The goals of this antlerless moose season are to provide additional opportunity during a time of year when conditions allow for good success in harvesting moose, slow the growth of this moose population, and to make progress toward achieving the board's intensive management (IM) harvest objective of 450–1,000 moose in all of Unit 21D by harvesting cows from this highly productive area.

If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost and our ability to meet Intensive Management (IM) harvest objectives could be compromised. In addition, rather than allow large population expansions and contractions, we believe it is important to manage the population for stability and a consistent harvestable surplus.

The 2019 through 2024 hunts had a 2-day reporting requirement and a quota of 25 moose with no more than 20 cows. Harvest from this hunt will make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels. For the March RM831 hunt, 5 cows and 3 bulls were harvested in 2019, 11 cows and 3 bulls were harvested in 2020, 7 cows and 1 bull in 2021, no moose were reported harvested in 2022 or 2023, and one cow was harvested in 2024.

Unit 21D has a positive finding for intensive management (IM), with IM objectives of a population of 7,000–10,000 and harvest of 459–1,000 moose. The IM harvest objective has not been met since 2003 when the estimated harvest was 489 moose. The average estimated harvest during regulatory years 2013–2023 was 393 moose, including reported and estimated unreported harvest. The overall Unit 21D population estimate at the end of 2018 was 10,478 moose (±1,572)

and has likely changed very little based on recent trend area surveys. The current estimated combined harvestable surplus is 1,095 moose for Unit 21.

This antlerless moose hunt area is approximately 2,559 mi^2 (21%) of the 12,093.6 mi^2 encompassed by Unit 21D. Moose abundance in the proposal hunt area was estimated at 4,000–4,500 moose, which is approximately 39–44% of the estimated total Unit 21D moose population.

The moose population in this portion of 21D is increasing, especially the number of cows in the population. Analysis of the combined Trend Count Areas (Squirrel Creek, Pilot Mtn., and Kaiyuh Slough TCAs) within the hunt area showed an increasing trend in moose abundance among all age classes from 2001 to present. Additionally, the Geospatial Population Estimate data also showed a statistically significant increase from 1,897 (±11%) moose in 2011 to 4,116 (±10%) moose in 2017. Moose twinning data for the winter any-moose hunt area showed high twinning rates since RY03 (average = 36.1%), with the 3-year average (RY21-23) at 33.3%.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Additional harvest opportunity, including the harvest of cows, exists in this portion of 21D.

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

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PROPOSAL 164 – - 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish & Game

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the antlerless winter moose hunt in Unit 21E.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 85.045(a) are:

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

...

There is a positive customary and traditional use finding for moose in Unit 21. The amount reasonably necessary for subsistence is 600 to 800 moose (5 AAC 99.025(8)).

Unit 21E also has a positive Intensive Management (IM) finding with a population objective of 9,000 – 11,000 moose and a harvest objective of 550 – 1,100.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the antlerless moose season for 21E (RM837) would be reauthorized. Antlerless hunts will continue to be available to hunters, and the department will continue to have the ability to use antlerless hunts as a tool to regulate the moose population.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The goals of this hunt are to provide additional harvest opportunity, meet harvest objectives, and stabilize the 21E moose population.

The most recent population estimate in 2022 indicated there were 9,300 moose in Unit 21E, which is within the range of the Intensive Management (IM) population objective of 9,000-11,000 moose. Bull-to-cow ratios are high, with 46 bulls per 100 cows.

Within the Unit 21E moose survey area (4,094 mi^2), the overall moose density increased from 1.0 moose/mi^2 in 2000 to 1.9 moose/mi^2 in 2022. During most of these years of growth, twinning rates have remained high. Twinning flights were conducted in 2022 and 2024, and the average twinning rate for those 2 years was 40%. Browse utilization remains high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern.

Additional harvest opportunity is available, particularly in the area around Holy Cross. Harvest in areas of high browse utilization reduces pressure on moose in those areas during deep snow winters.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. There are additional moose that can be harvested, and this proposal will help meet harvest objectives.

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

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PROPOSAL 165 – 5 AAC 85.045(24). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 26A.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose season in the western portion of Unit 26A.

WHAT ARE THE CURRENT REGULATIONS? Antlerless moose hunts for residents are allowed in the portion of Unit 26A west of 155˚ 00' W. longitude, excluding the Colville River drainage, where antlerless hunting through a 1 moose bag limit is allowed July 1–September 14.

There is a positive C&T for moose in Unit 26, and an ANS of 21–48, including 15–30 in Unit 26A. There is a negative intensive management finding for moose in Unit 26A.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The antlerless moose hunt in the portion of Unit 26A west of 155° 00’ W longitude and north of the Colville drainage would be reauthorized. Because antlerless moose seasons were closed due to population declines in the remainder of the unit, only the western portion of Unit 26A has a hunt affected by this proposal.

BACKGROUND: The moose population is low in Unit 26A and has declined since 2008. The minimum population count declined from 1,180 moose in 2008 to 610 moose in 2011. The population grew slowly from 2011–2013 but declined again to 294 moose in 2014. The most recent minimum count was conducted in 2017 and estimated 339 moose. Reported moose harvest in recent years has remained low, ranging between 1 and 13 moose for the period 2010-2020. Moose in these regions can be a useful source of meat in times of low caribou abundance or sparse caribou distribution.

The portion of Unit 26A west of 155° 00’ W longitude and north of the Colville drainage does not have a year-round moose population. Moose occasionally disperse away from the major river drainages to the coastal plain during summer months, and these are the only moose available for harvest in this northwestern portion of Unit 26A. The small number of antlerless moose harvested under the hunt have very little impact on the size of the population. To date, after several years of hunting opportunity in this area, only 4 antlerless moose have been harvested: 1 cow in 2006, 1 in 2008, 1 in 2014, and 1 in 2018. One bull moose was harvest under this regulation in 2020. Keeping an antlerless moose season in this portion of Unit 26A provides additional opportunity in a portion of the state that generally does not have moose.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Antlerless harvests in the western section of Unit 26A are anticipated to be very low and have little impact on the population.

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

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PROPOSAL 190– 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the resident and nonresident hunt structure for sheep in Unit 19C.

PROPOSED BY: Unit 19C Sheep Working Group

WHAT WOULD THE PROPOSAL DO? This proposal would close Unit 19C to all sheep hunts except the RS380 subsistence hunt (Oct 1 – Apr 30) during regulatory year (RY) 25. Following this 1-year closure there would be a temporary draw hunt (one ram with full-curl horn or larger) for two regulatory years (RY26 and RY27) for both residents and nonresidents. Eighty percent of permits would be allocated to residents and 20% to nonresidents, with a 5% cap for second degree kindred (2DK) nonresident hunters coming out of the nonresident allocation. The resident relative would also be required to notch their harvest ticket to include the 2DK harvest, meaning the animal harvested by the 2DK hunter also counts toward the bag limit of the resident accompanying the nonresident.

The proposal also requests that Unit 19C be used as the pilot program for the guide concession program, to be implemented by 2028. In 2028, if the guide concession program for Unit 19C is in place, then resident and nonresident fall sheep hunting will return to harvest ticket hunts (GS000).

WHAT ARE THE CURRENT REGULATIONS? Currently there is no youth hunt or nonresident sheep hunting opportunity in Unit 19C through RY27. These hunts will reopen in RY28. The resident general season (GS000) and the winter subsistence (RS380) remain open.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory		

years, by youth hunt only; or	No open season
1 ram with full-curl horn or larger, every 4 regulatory years	No open season

There is a positive customary and traditional use finding in Unit 19 with an amount reasonably necessary for subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, the fall general season (GS000) for both residents and nonresidents would be closed in RY25. Following the one-year general season closure there would be a limited draw hunting opportunity during the fall for two years (RY26 and RY27) for both residents (80% of allocated permits) and nonresidents (20% of allocated permits), and nonresidents accompanied by resident relatives within second-degree of kindred would be capped at receiving no more than 5% of the permits.

Unit 19C would be selected as the pilot unit for the guide concession program. If the guide concession program is in place in Unit 19C for RY28, all general season sheep hunts would reopen with a harvest ticket and full curl management as it was prior to the passage of Proposal 204 in March 2023. If no guide concession program is in place, the board will need to determine how to offer sheep hunting opportunity in Unit 19C in RY28 and beyond.

This proposal makes no changes to the current regulations for the winter subsistence hunt (RS380).

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt for residents; and both the youth hunt and regular fall-season hunt for nonresidents for a five-year period. The youth hunt for residents and both the youth and regular fall-season hunts for nonresidents will reopen in RY28.

Unit 19C has two sheep hunts open in RY25: a general season for residents with full curl horn restrictions from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken during October 1 – April 30. While the fall sheep season does provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. Beginning in 2019 sheep numbers began to decline. By 2023, the department observed only 38% of the 2010-2019 average sheep population. The most significant declines were in the eastern portion of the unit where the department observed 10% of the 2010-2019 average sheep population. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey

showed little change in the adult age classes from 2023, but surveys recorded higher numbers of lambs observed (70 in 2023 and 120 in 2024).

Most sheep hunting takes place during the fall general season. During the last decade (RY13–RY22), for both resident and non-resident hunting opportunities, residents composed 49% of all sheep hunters in Unit 19C, with an average of 84 resident hunters per year. Nonresidents in that same period composed 51% of sheep hunters with an average of 85 hunters per year. In RY22, the last year open to nonresidents, the number of nonresident hunters declined from the 2018 high of 109 hunters to 56. In RY22 the number of resident hunters declined from the 2018 high of 109 hunters to 38. In RY23, the first year of resident-only hunting, there were 49 resident hunters. In RY24 there were 46 resident hunters.

Over the 10-year period (RY13–RY22) when hunting was open to nonresidents, an average of 85 sheep were harvested per year. Nonresident harvests accounted for 68% of all sheep harvested. Resident harvest accounted for 32% of all sheep harvested. Resident success rates averaged 33%. Nonresident success rates averaged 68%. The overall average success rate, all hunters combined, was 50%. In RY22, nonresidents harvests declined from the RY18 high of 81 to 26 sheep harvested. In RY22, resident harvest declined from the RY17 high of 46 sheep harvested to three sheep harvested by residents. In RY23 residents harvested 5 sheep. In RY24 residents harvested 10 sheep.

Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through the 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when all hunters combined harvested 120 sheep. Since RY18, harvest has decreased to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest. This is similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older. Previous research has shown these older rams have higher natural mortality rates than younger aged rams. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small portion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small portion of the population and this imposes a self-limiting factor on overharvest of the

population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting under the proposed structure, to meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses.

If the board adopts the proposal, it will need to consider how many drawing permits the department should issue. The board will also need to determine if the 5% cap on nonresidents accompanied by resident relatives within second-degree of kindred is 5% of the 20% that go to nonresidents, or if it is 5% of the total number of permits available. If it is 5% of the 20% that go to nonresidents, a minimum of 100 permits will need to be issued in order for a single permit to be awarded to nonresidents accompanied by relatives within the second-degree of kindred.

COST ANALYSIS: Assessing the financial (costs) of this program is difficult because of the many unknowns associated with the proposed guide concession program. The Alaska Legislature passed a bill in the 2024 legislative session creating the concession program but did not include funding. For the 2025 legislative session, there is funding included in the Alaska Department of Natural Resources budget and for a staff position in the department. However, this funding has not been approved as of the development of this A&R.

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PROPOSAL 191 - 5 AAC 92.540(3)(I)(ii). Controlled Use Areas. Define the beginning and terminus of the Nine Mile trail in the Ladue River Controlled Use Area (LRCUA).

PROPOSED BY: The Alaska Wildlife Troopers

WHAT WOULD THE PROPOSAL DO? Define in regulation the beginning, terminus, and scope of the Nine Mile Trail, within the LRCUA. The new proposed regulation would add sub-section (iii) to 5AAC 92.540(3)(I), expanding upon motorized land vehicle restrictions as explained in sub-section (ii). 5AAC 92.540(3)(I)(iii). The Nine Mile Trail as referenced in this regulation refers to the single primary ATV trail beginning along the Taylor Highway at coordinates (1) N63 24.233 x W142 28.422, entering the western portion of the defined controlled use area at coordinates (2) N62 23.879 x W142 9.073, and terminating at coordinates (3) N62 32.420 x W141 27.995. Only the single primary trail including connected bypasses no more than 20 feet.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540(3)(I)(ii) identifies motorized access restrictions within the LRCUA.

(ii) the area is closed to the use of any motorized land vehicle for hunting, including the transportation of hunters, their hunting gear, or parts of game, from August 24 through

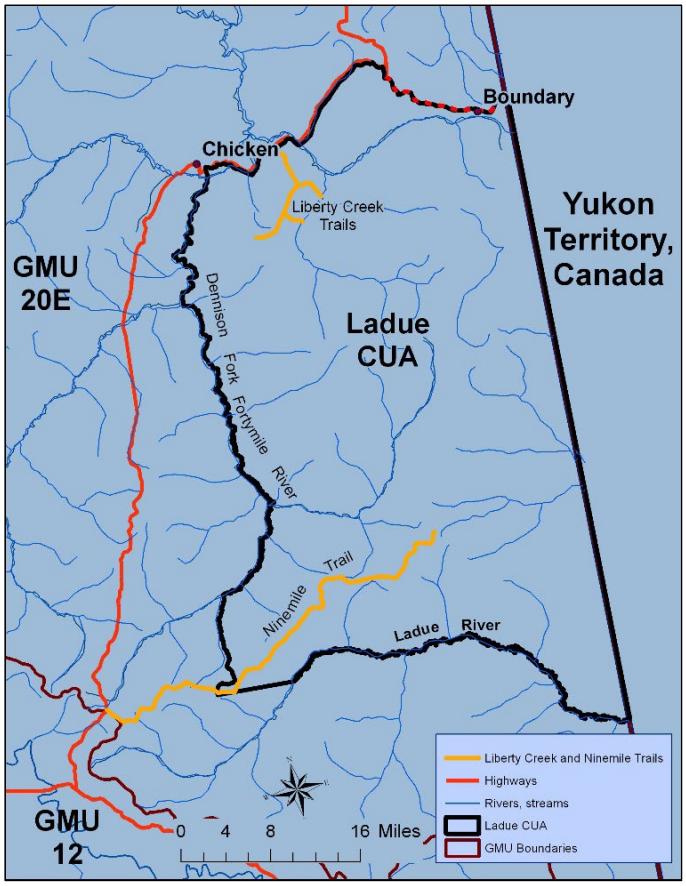

Figure 4: Map of designated trails within the LRCUA, including The Nine Mile Trail, as presented to the Board of Game, Proposal 93, 2008.

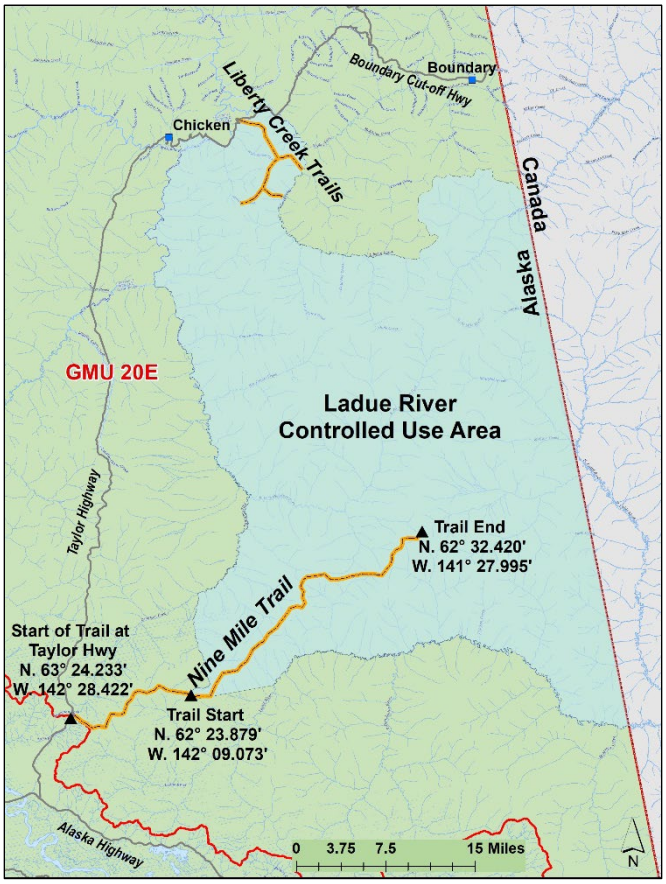

Figure 3: Map of designated trails within the LRCUA, including beginning and end coordinates for The Nine Mile Trail, as marked with signage by ADF&G and proposed in Proposal 191, 2025.

September 20; however, this provision does not prohibit motorized access, or transportation of game, on the Nine Mile and Liberty Creek trails, the Alaska-Canada border, or the Boundary Cutoff of the Taylor Highway, or the transportation into the area of game meat that has been processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

If adopted, this proposal would define the beginning and terminus coordinates, as well as the extent, of the Nine Mile Trail in regulation to clarify those originally adopted by the board of game in March 2008. Although the trail is currently authorized for use with access restrictions, specifying the beginning and terminus coordinates would create enforceable regulations, provide clarity to hunters, and improve compliance.

BACKGROUND: In 1994, the LRCUA was established by the board of game to limit the expansion of motorized land vehicle trails and mitigate the impacts of unregulated access on the low-density moose population and their habitat in the southeastern portion of Unit 20E. In 2008, the Board of Game amended travel restrictions within the LRCUA to update and clarify access

dates and designate trails for motorized land access. Motorized travel was limited to trails currently listed in 5 AAC 92.540(3)(I)(ii), although the beginning and the terminus of these trails were not specifically defined in regulation. However, the department's presentation for proposal 93 to the board included a map developed by ADF&G, with input and support from the Upper Tanana Advisory Committee, illustrating the locations of designated trails that allow motorized access within the LRCUA (Fig. 1). The proposal was adopted by the board at their March 2008 meeting with the intended configuration of the Nine Mile Trail as depicted on the map in the department's presentation (Fig. 1).

In recent years, the Nine Mile Trail has experienced an increase in traffic due to the re-establishment of a gold mining operation beyond the terminus depicted on the 2008 map (Fig. 1). Although several signs have been placed at the terminus of the trail since 2008, in fall of 2023 it was discovered the sign was absent. The surge in traffic has expanded motorized access off and beyond the established trail, resulting in newly developed branches as well as continuations outside of the original intended extent of the trail system. This situation has led to complaints by moose hunters who adhere to the intended trail and who have witnessed new hunters violating the access regulations by proceeding past the terminus and onto unauthorized trail extensions not authorized by the board. Although ADF&G remarked the Nine Mile Trail in 2024 with signs at the beginning and terminus of the trail (Fig. 2), the absence of clearly defined delineations for the trail in regulation, has made it difficult for Alaska Wildlife Troopers to properly enforce travel restrictions in the LRCUA.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it clarifies existing motorized restrictions within the LRCUA in regulation, which will allow Alaska Wildlife Troopers to effectively enforce these restrictions.

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

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PROPOSAL 192 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the resident and nonresident hunt structure for sheep in Unit 19C.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would keep general season (Aug. 10 – Sept 20) resident sheep hunting opportunity (GS000) under the current harvest ticket structure. Nonresident opportunity from Aug 10 – Sept 20 would only be reinstated if a drawing permit hunt is implemented. Currently, there is no nonresident hunting opportunity in Unit 19C through Regulatory Year (RY) 2027. There are no proposed changes to the winter subsistence hunt (RS380).

WHAT ARE THE CURRENT REGULATIONS? Currently there is no youth hunt or nonresident sheep hunting opportunity in Unit 19C through RY27. These hunts will reopen in RY28. The resident general season (GS000) and the winter subsistence (RS380) remain open.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 19(C)		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by youth hunt only; or	No open season	
1 ram with full-curl horn or larger; or	Aug. 10 - Sept. 20	
1 sheep with ¾-curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited; by registration permit only	Oct. 1 - April 30 (Subsistence hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by youth hunt only; or		No open season
1 ram with full-curl horn or larger, every 4 regulatory years		No open season

There is a positive customary and traditional use finding in Unit 19 with an amount reasonably necessary for subsistence (ANS) of 1-5 sheep (5 AAC 99.025 (10)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, there would be no change to the general hunting season (GS000) for resident hunters in Unit 19C. Nonresident general season opportunity would remain closed unless a drawing permit hunt is implemented. If implemented, this would reopen Unit 19C to nonresident hunting with the board determining permit allocation. There is currently no nonresident hunting opportunity in Unit 19C until RY28.

There would be no change to the current regulations for the winter subsistence hunt (RS380).

BACKGROUND: In March 2023, the board deliberated on Proposal 204 to close all sheep hunting in Unit 19C for a five-year period. The proposal was amended to close only the youth hunt for residents; and both the youth hunt and regular fall-season hunt for nonresidents for a

five-year period. The youth hunt for residents and both the youth and regular fall-season hunts for nonresidents will reopen in RY28.

Unit 19C has two sheep hunts open in RY25: a general season for residents with full curl horn restrictions from August 10–September 20; and a winter registration permit hunt (RS380) for residents only, with a bag limit of one ram with ¾ curl horn or smaller, excluding rams with both tips broken, during October 1 – April 30. While the fall sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity consistent with the pattern of customary and traditional uses.

The first consistent sheep surveys conducted in portions of Unit 19C began in 2010. Beginning in 2019 sheep numbers began to decline. By 2023, the department observed only 38% of the 2010-2019 average sheep population. The most significant declines were in the eastern portion of the unit where the department observed 10% of the 2010-2019 average sheep population. These declines were most likely the result of difficult winter conditions associated with heavy snow fall, winter rain events creating ice on snow, and late springs. The most recent 2024 survey showed little change in the adult age classes from 2023, but surveys recorded higher numbers of lambs observed (70 in 2023 and 120 in 2024).

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Total annual sheep harvest in Unit 19C has varied significantly since the 1980s. Total harvest increased from the 1980s through the 1990s and peaked at 127 sheep in 1995. Harvest then decreased during the late 1990s and averaged approximately 65 sheep annually from 2000-2010. Beginning in 2011, harvest steadily increased until RY18, when all hunters combined harvested 120 sheep. Since RY18, harvest has decreased to a low of 29 sheep in RY22. This represents a 40-year low and a 75% decrease in harvest over a four-year period. Although sheep survey data are not available for much of the above period, the cyclical nature of peaks and valleys observed in the harvest data likely reflects similar trends in sheep abundance.

Since the 1980s, residents accounted for about 33% of annual harvest while nonresidents took 67% of the harvest. This is similar to the most recent 10-year average prior to the RY23 closure to nonresidents. The proportion of sheep harvested by residents and nonresidents has remained relatively similar across years despite the fluctuations in total harvest described above.

Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on: 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams, on average, become full-curl at 8 years of age or older. Previous research has shown these older rams have higher natural mortality rates than younger aged rams. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a lower impact on population growth compared to female survival rates. Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small portion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small portion of the population and this imposes a self-limiting factor on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for maximum hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it addresses allocation. If the board chooses to reopen nonresident hunting under the proposed structure, to meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses.

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

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