

**ALASKA DEPARTMENT OF FISH AND GAME**  
**STAFF COMMENTS FOR PROPOSALS 85-87, 102-120, 122-125, 138, 141, and 149-165**  
**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:** Nany 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 speculate 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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Proposals 88-101

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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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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  $\frac{3}{4}$  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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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 these 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  $\frac{3}{4}$  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.

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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  $\frac{3}{4}$  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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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.

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 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  $\frac{3}{4}$  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  $\frac{3}{4}$  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 110** – 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?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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  $\frac{3}{4}$  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?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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;	Oct. 1 - April 30 (Subsistence hunt only)	

by registration permit 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  $\frac{3}{4}$  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?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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.

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  $\frac{3}{4}$  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 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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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	Oct. 1 - April 30 (Subsistence hunt only)	

ewes with lambs, is prohibited;  
by registration permit 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  $\frac{3}{4}$  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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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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  $\frac{3}{4}$ -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  $\frac{3}{4}$  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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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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  $\frac{3}{4}$ -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  $\frac{3}{4}$  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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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?**

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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  $\frac{3}{4}$  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  $\frac{3}{4}$  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;

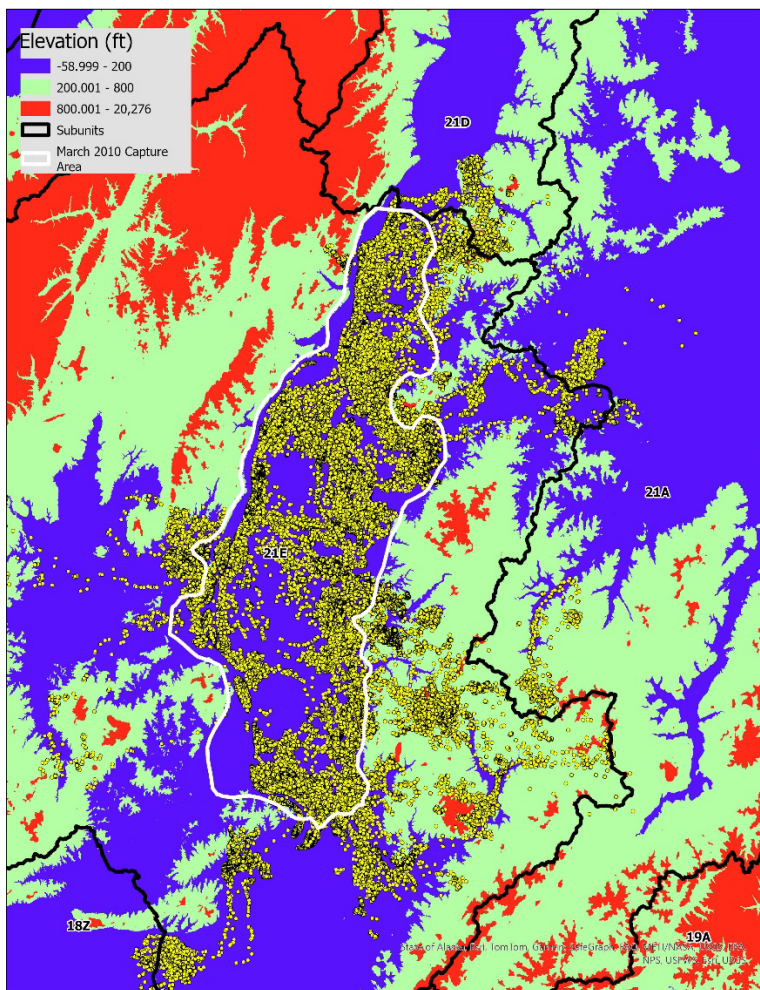
...

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.

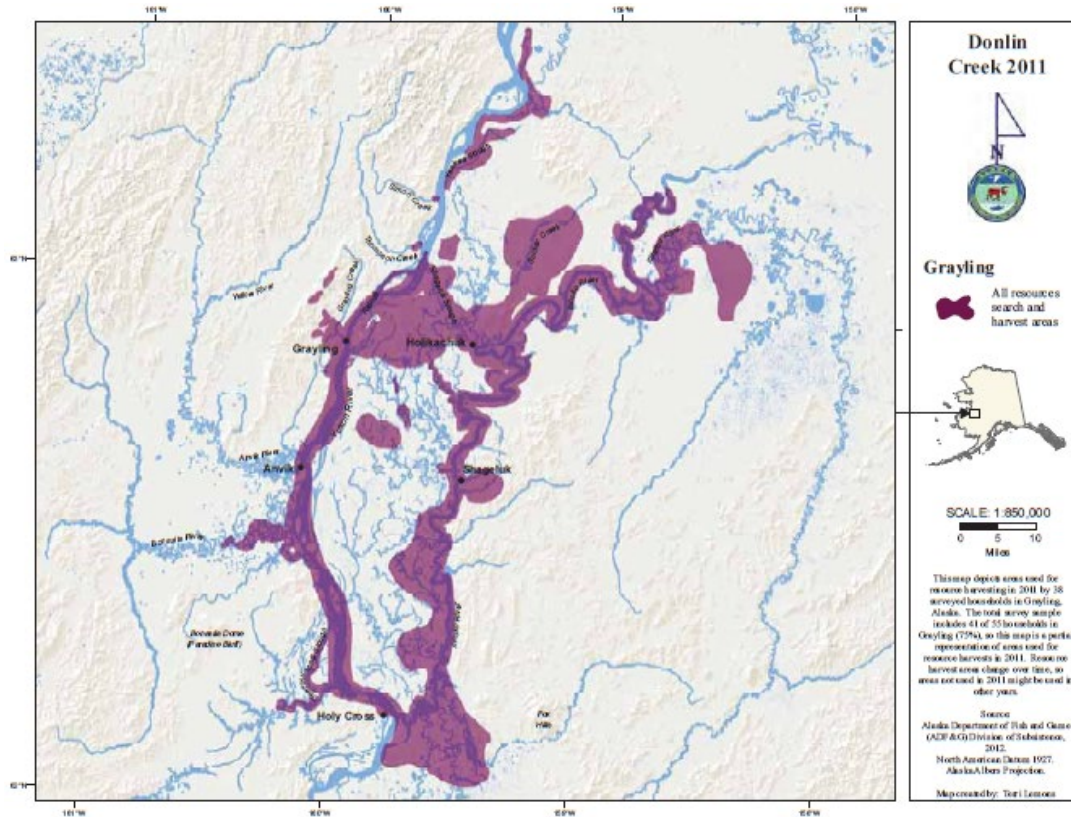


**Figure 1.** Moose relocations of the 2010-14 moose telemetry study in Unit 21E, (Paragi et al., 2017, Alaska Dept. of Fish and Game).

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.

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**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<sup>2</sup>.

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

Unit 25C is located entirely within the Fairbanks Nonsubsistence 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<sup>2</sup> to 5,137 mi<sup>2</sup>.

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

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<sup>2</sup> of GMU 25C and add 5 mi<sup>2</sup> to GMU 25D.



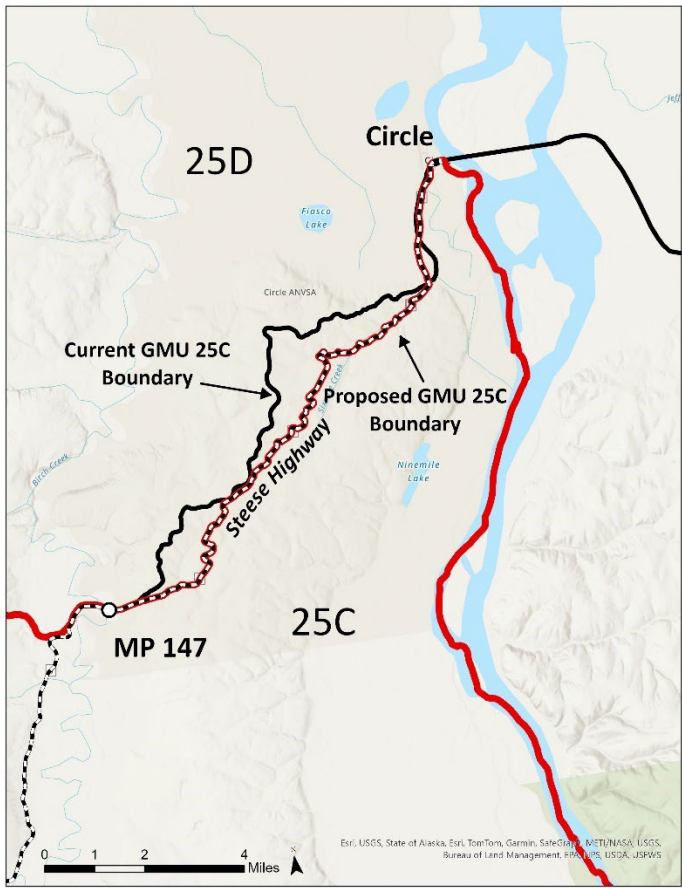


Figure 1. Map showing current and proposed boundary of GMU 25C and 25D between Birch Creek and the Yukon River.

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

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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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Proposals 126-137

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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.

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Proposals 139-140

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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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Proposals 142-148

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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)):**

<b>Unit</b>	<b>Finding</b>	<b>Amount reasonably necessary for subsistence</b>
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:

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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)  1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued	Sept. 1–Oct. 31 (General hunt only)	No open season
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:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(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)
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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:

<u>Units and Bag Limits</u>	<u>Resident Open Season (Subsistence and General Hunts)</u>	<u>Nonresident Open Season</u>
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept 1—Mar 31 (General hunt only)	Sept 1—Mar 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
1 moose by drawing permit, by bow and arrow only; up to 25		

permits may be issued

Unit 14(C), that portion known as the Anchorage Management Area

Sept. 1—Nov. 30  
(General hunt only)

No open season

1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued

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

1 moose by drawing permit only; up to 50 permits may be issued; or

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

Sept. 1—Sept. 30

1 bull by registration permit only

Oct. 1—Nov. 30  
(General hunt only)

Oct. 1—Nov. 30

...

Remainder of Unit 14(C)

1 moose per regulatory year, only as follows:

1 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.

<b>Regulatory Year</b>	<b>Either Sex Permits</b>	<b>Antlerless Permits</b>	<b>Cows Harvested</b>
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.

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**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:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(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.

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**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:

	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<b>Units and Bag Limits</b>		

(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.

\*\*\*\*\*

**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

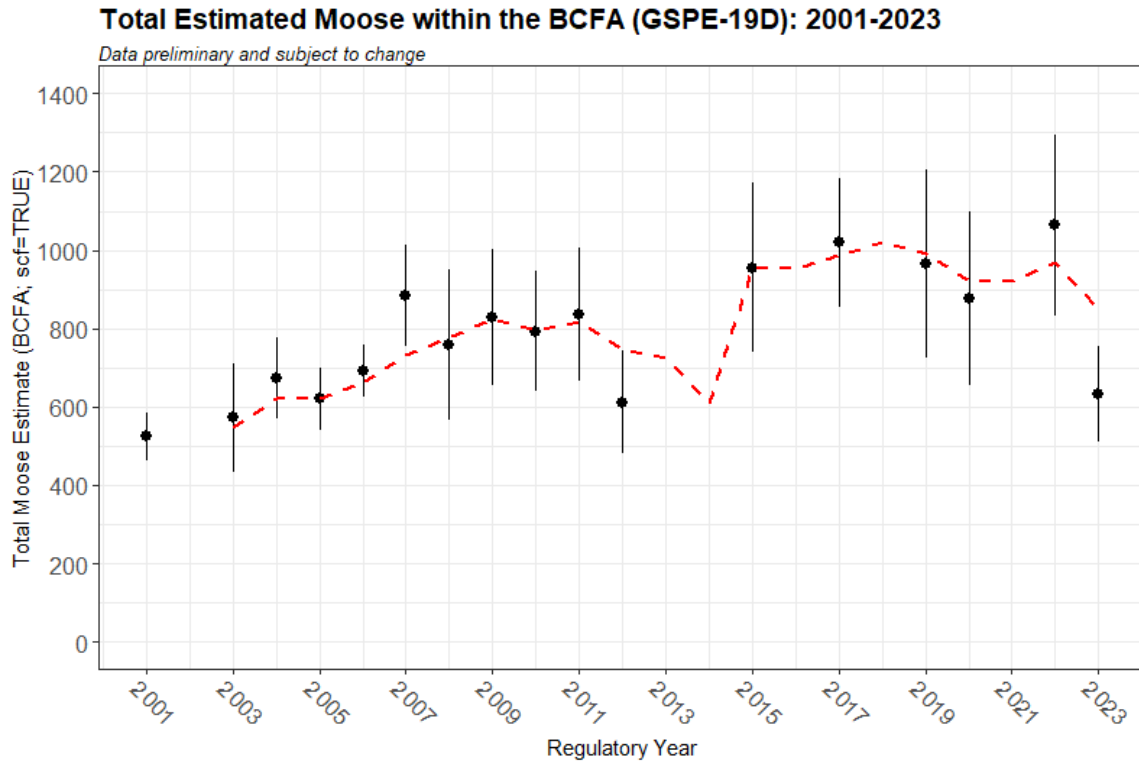


Figure 1. GSPE population estimate within the Bear Control Focal Area (BCFA) using a sightability correction factor for GMU 19D 2001-2023. Points and vertical lines indicate annual population estimates and 90% Confidence Intervals. The dashed red line is the 3-year moving average of the GSPE point estimate.

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).

## Estimated bulls per 100 cows within the BCFA (GSPE-19D): 2001-2023

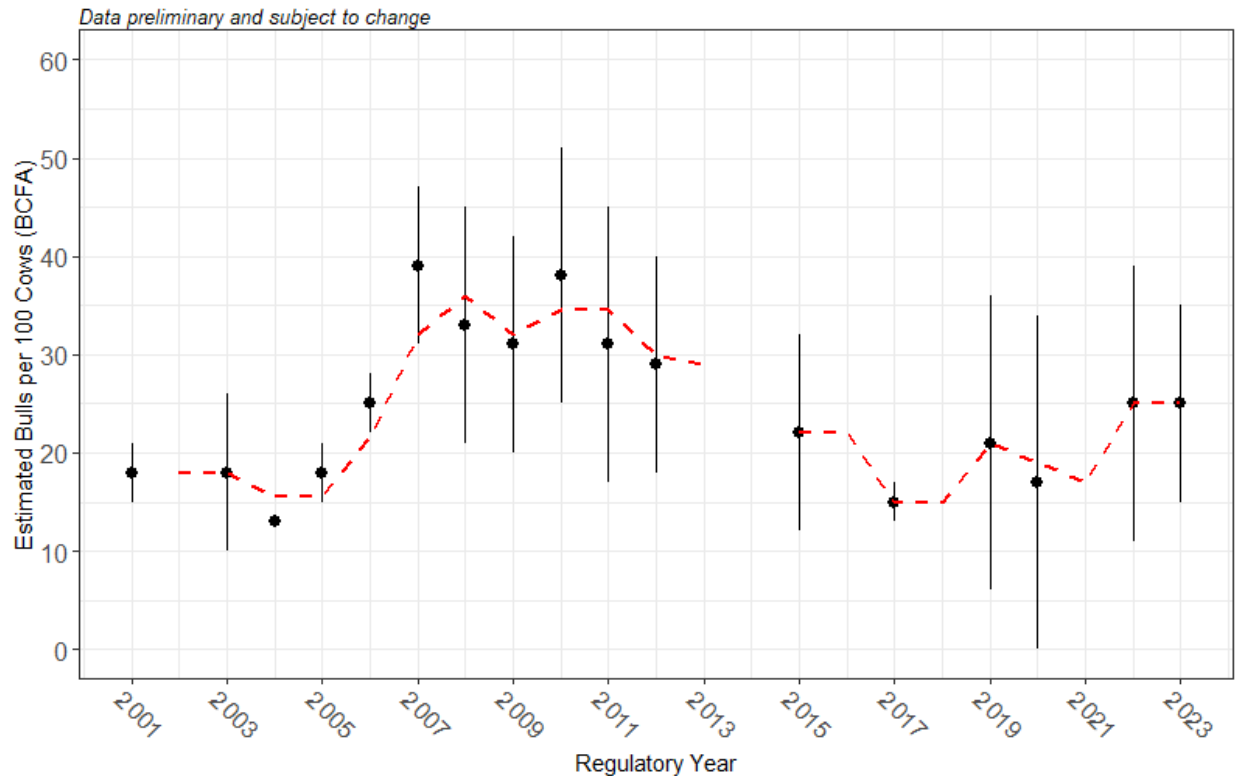


Figure 2. Bull-to-cow ratios within the Bear Control Focal Area (BCFA) derived from GPSE surveys in GMU 19D 2001-2023. Points and vertical lines indicate annual estimate ratios and 90% Confidence Intervals. The dashed red line is the 2-year moving average of bull-to-cow ratio point estimates.

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<sup>2</sup>) to 1,591 moose (1.4 moose/mi<sup>2</sup>). 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<sup>2</sup> 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 **SUPPORTS** 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.

\*\*\*\*\*

**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)**

<b>Units and Bag Limits (18)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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...

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  
5-Sept. 5 drawing permit Oct. 15-Nov. 30  
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

1 antlerless moose by Oct. 15-Nov. 30  
drawing permit only; up to  
400 permits may be issued; a  
person may not take a cow  
accompanied by a calf

...

#### NONRESIDENT HUNTERS

...

1 antlerless moose by  
drawing permit only; by Aug. 5-Sept.5  
youth hunt only; up to 100 Oct. 15-Nov. 30  
permits may be issued in  
combination with the  
nonresident drawing hunt; a  
person may not take a cow  
accompanied by a calf

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<sup>2</sup>, 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 **SUPPORTS** 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 nutritional 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.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(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 ( $\pm 1,572$ )

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<sup>2</sup> (21%) of the 12,093.6 mi<sup>2</sup> 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:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(19)

Unit 21(E)

RESIDENT HUNTERS:

...

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

Feb 15 – Mar 15

...

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<sup>2</sup>), the overall moose density increased from 1.0 moose/mi<sup>2</sup> in 2000 to 1.9 moose/mi<sup>2</sup> 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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