

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS 83-84, 90, 97-108, 134-144, 154, 193, 233-239, 250-251,
254-256 and 258-261

SOUTHCENTRAL REGION REGULATIONS PROPOSALS

ALASKA BOARD OF GAME MEETING

KODIAK, ALASKA

MARCH 20-25, 2026



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 20-25, 2026 in Kodiak, 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 83 – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Increase the resident bag limit from 1 to 2 black bears.

PROPOSED BY: Jessie Dunshie

WHAT WOULD THE PROPOSAL DO? Increase the resident bag limit for the RL065 black bear hunt in Unit 6 to 2 bears.

WHAT ARE THE CURRENT REGULATIONS?

Unit 6(D)

1 bear by registration permit only

Sept. 10 – June 10

There is a positive customary and traditional use finding for black bears in Unit 6 with an amount reasonably necessary for subsistence of 80-120 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Annual harvest of black bears could increase. Residents harvest the majority of black bears in Unit 6D and could capitalize on the additional opportunity for an individual to take additional bears. If faster and higher rates of harvest were to occur earlier in the regulatory year this could increase the chances of an emergency order closure and reduce future harvest opportunity for those planning a hunt later in the season.

BACKGROUND: Black bear hunting in Prince William Sound is a popular spring activity. Black bears are also a sought-after species to observe on wildlife viewing excursions, which are frequent during spring and summer. Meat salvage is required in the spring when most of the harvest occurs.

Black bears are difficult and expensive to enumerate. Harvest data is currently the only tool for trying to understand population status and trajectory. All black bears harvested in Unit 6 must be sealed within 30 days of harvest. Annual harvest has ranged from a high of 570 bears in regulatory year (RY) 07 to a low of 89 bears in RY15.

Periods of high harvest (RY00–01 and RY05–RY11) have been followed by periods of much lower harvest (RY02–04 and RY12–19). Harvest began climbing in RY19 and over 500 black bears were harvested in RY23. The preliminary RY24 harvest estimate is approximately 300 bears (Figure 1).

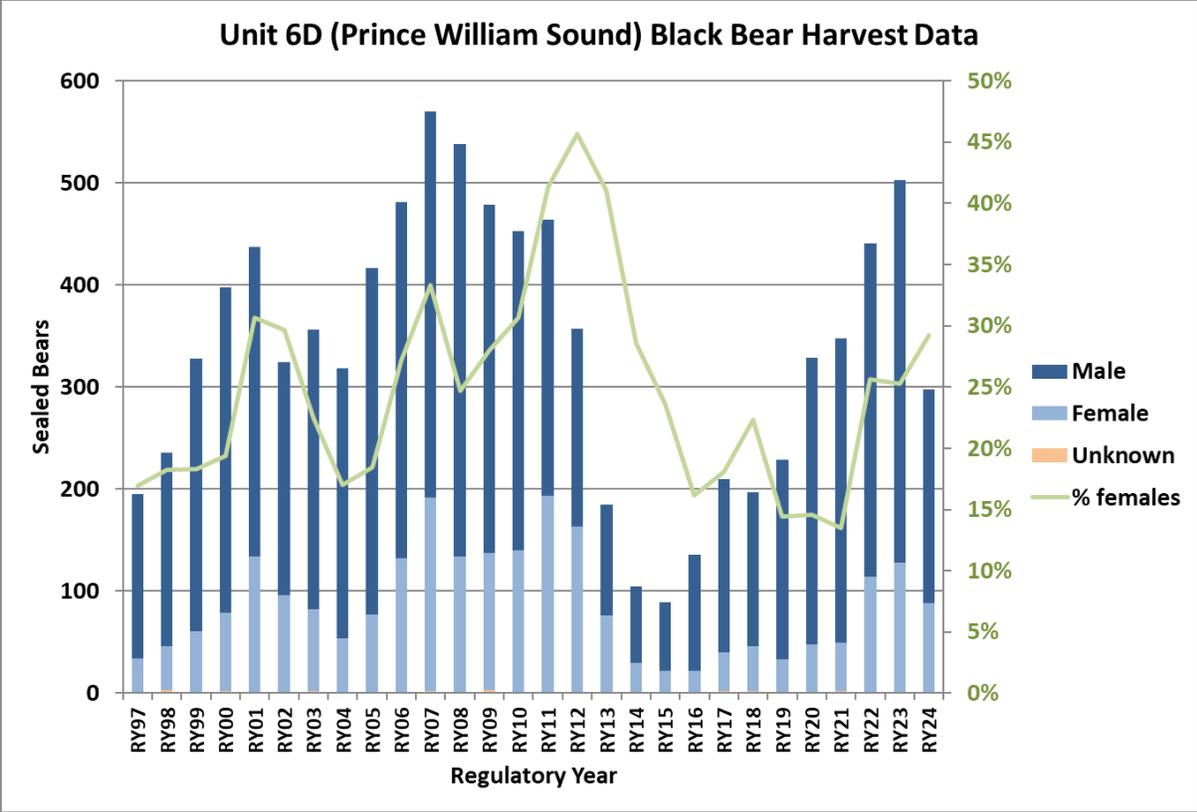


Figure 1. Unit 6D black bear harvest data.

Effort has only been monitored since RY09 when harvest tickets became mandatory for black bears. In RY15, a registration hunt (RL065) replaced the harvest ticket and allowed for better in-season management with a 3-day reporting period. Historically reported hunting effort was 800–974 hunters per year until RY14 when it dropped to 528–608 hunters. It stayed in that range until RY18 and climbed to over 1,000 reported hunters obtaining registration permits from RY22–24 (Figure 2).

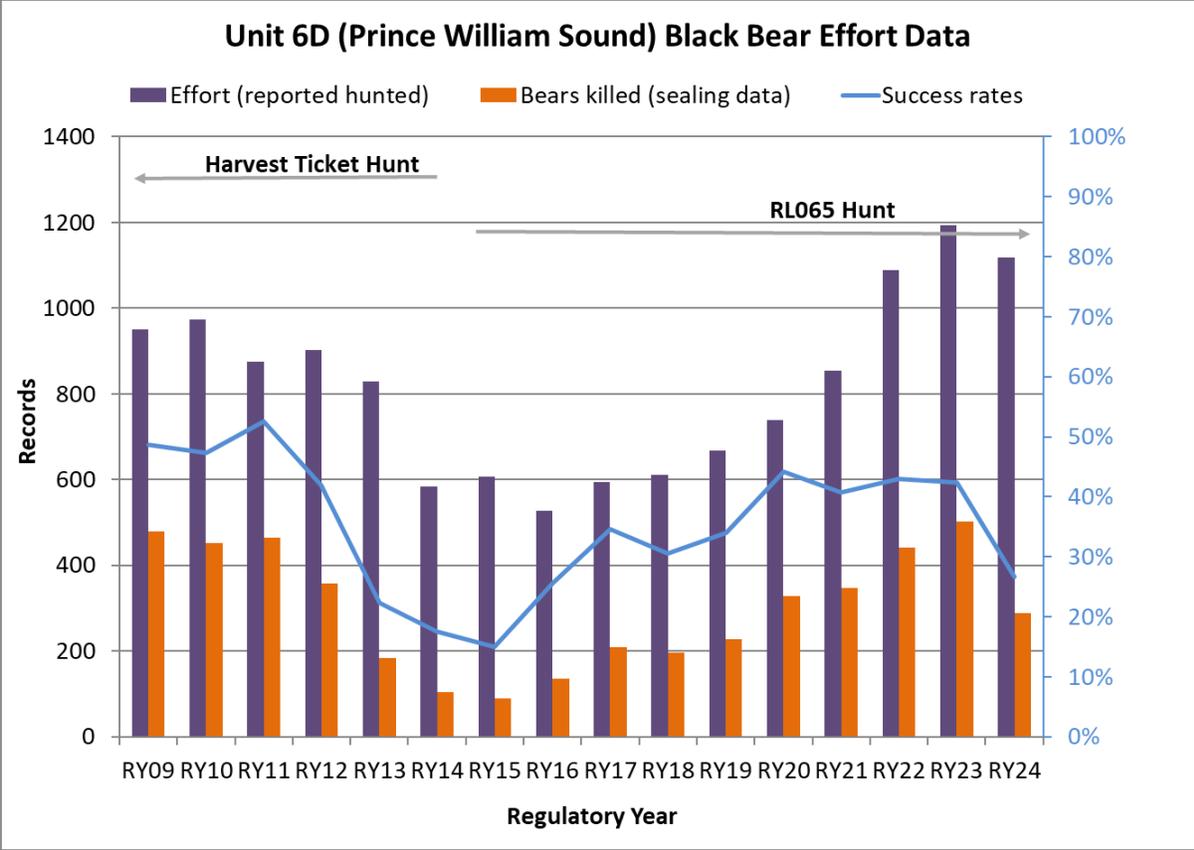


Figure 2. Unit 6D black bear hunter effort.

Over the last twenty years (RY05-RY24), less than 10% of hunters killed more than one bear in Unit 6 during a three-year period. The number of hunters that would kill two bears each year is likely even less than this. However, if even 10% of hunters killed an additional bear, it could impact harvest opportunity for the current or upcoming years based on current management and harvest objectives.

DEPARTMENT COMMENTS: The department **OPPOSES** an increase in the black bear bag limit when concerns about increasing harvest rates exist and both harvest and effort are near the highest levels ever recorded. Moderating dramatic highs and lows in harvest increases stability for long-term hunting opportunities. Currently, emergency order authority can be used for such a purpose by modifying season dates. However, emergency orders create challenges for hunters and commercial operators and the department avoids issuing them unless there is a clear biological necessity. Additional hunting opportunity exists in neighboring units for people to harvest additional black bears in the same season if they are interested.

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

PROPOSAL 84 – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Shorten the fall black bear season in Unit 6D.

PROPOSED BY: David Pinguoch

WHAT WOULD THE PROPOSAL DO? Shorten the fall season for black bears in Unit 6D by 20 days.

WHAT ARE THE CURRENT REGULATIONS?

Unit 6(D)

1 bear by registration permit only

Sept. 10 – June 10

There is a positive customary and traditional use finding for black bears in Unit 6 with an amount reasonably necessary for subsistence of 80-120 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The fall season would not start until October 1. Overall black bear harvest may be reduced since by October 1st many bears will no longer be frequenting salmon streams, where they are more vulnerable to harvest.

BACKGROUND: Black bear hunting in Prince William Sound is a popular spring activity. Black bears are also a sought-after species to observe on wildlife viewing excursions, which are frequent during spring and summer. Meat salvage is required in the spring when most of the harvest occurs.

Black bears are difficult and expensive to enumerate. Harvest data is currently the only tool for trying to understand population status and trajectory. All black bears harvested in Unit 6 must be sealed within 30 days of harvest. Annual harvest has ranged from a high of 570 bears in regulatory year (RY) 07 to a low of 89 bears in RY15.

Periods of high harvest (RY00–01 and RY05–RY11) have been followed by periods of much lower harvest (RY02–04 and RY12–19). Harvest began climbing in RY19 and over 500 black bears were harvested in RY23. The preliminary RY24 harvest estimate is approximately 300 bears (Figure 1).

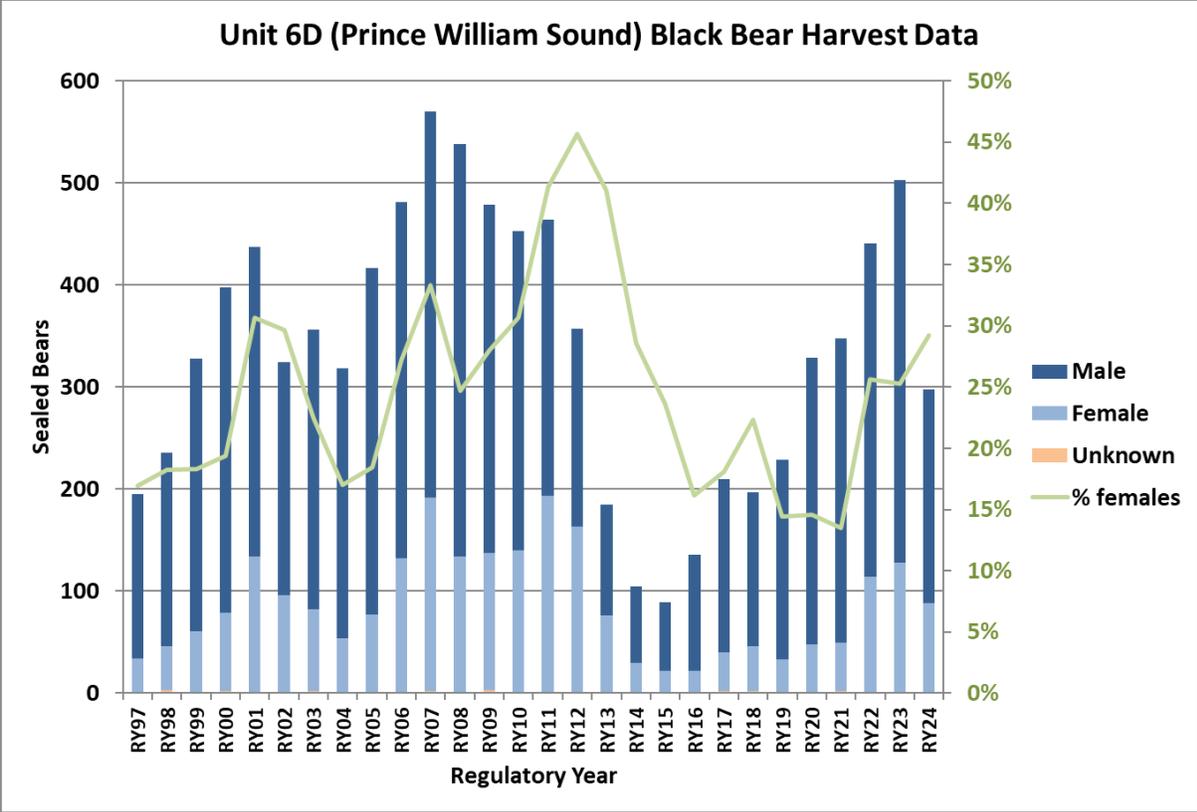


Figure 1. Unit 6D black bear harvest data.

Effort has only been monitored since RY09 when harvest tickets became mandatory for black bears. In RY15, a registration hunt (RL065) replaced the harvest ticket and allowed for better in-season management with a 3-day reporting period. Historically reported hunting effort was 800–974 hunters per year until RY14 when it dropped to 528–608 hunters. It stayed in that range until RY18 and climbed to over 1000 reported hunters obtaining registration permits from RY22–24 (Figure 2).

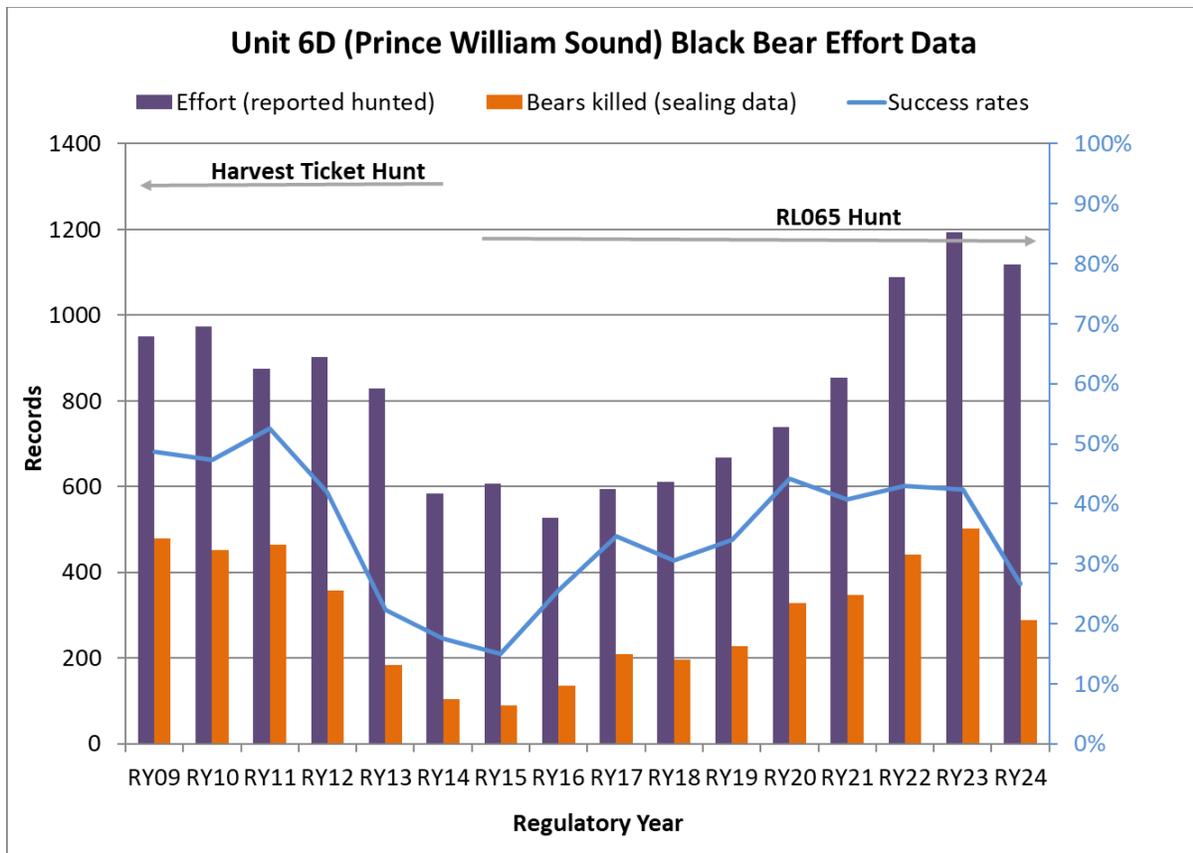


Figure 2. Unit 6D black bear hunter effort.

The vast majority (10-year average of 90%) of harvested bears are taken in the spring. Although the take of females is proportionally higher in the fall (46% females in the fall harvest compared with 18% females in the spring harvest), the total contribution of the fall harvest to the total harvest is minimal. If the season were to have started on October 1 for the last 10 years, an average of 21 bears a year (10 of which were sows) would not have been harvested. Based on the last 10 years, the overall impact of delaying the start of the fall season would result in a 7% reduction in harvest.

DEPARTMENT COMMENTS: The department is **OPPOSED** to unnecessary reduction in opportunity. Moderating dramatic highs and lows in harvest increases stability for long-term hunting opportunities. Fall harvest rates are already low and do not contribute as many bears to the total harvest.

To meet the board’s statutory responsibility to the subsistence law, it should consider whether regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 90 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose in Units 7 & 15. Change the bag limit for moose in Units 7 and 15.

PROPOSED BY: Kenneth Halpin

WHAT WOULD THE PROPOSAL DO? This proposal would add bull moose with 10 antler points or more on at least one side to the legal resident and nonresident bag limits for Units 7 and 15.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in 5 AAC 85.045(13) are:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(5)		
Unit 7, that portion west of Resurrection Creek Trail and north of the Sterling Highway		
1 bull per regulatory year, only as follows:		
1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1—Sept. 25 (General hunt only)	Sept. 1—Sept. 25
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side by drawing permit only; up to 25 permits may be issued in combination with Unit 15(A), that portion east of the Mystery Creek road and the Pipeline Road, and north of the Sterling Highway;	Oct. 10—Nov. 10 (General hunt only)	Oct. 10—Nov. 10

(6)

Remainder of Unit 7

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1—Sept. 25
(General hunt only)

Sept. 1—Sept. 25

(13)

Unit 15(A), the Skilak Loop Wildlife Management Area

1 bull with spike-fork antlers by drawing permit only; up to 30 permits may be issued; or

Sept. 15—Sept. 30
(General hunt only)

Sept. 15—Sept. 30

1 bull by drawing permit only;

Sept. 1—Sept. 25

No open season

Unit 15(A), that portion east of the Mystery Creek Road and the Pipeline Road and north of the Sterling Highway

1 bull per regulatory year, only as follows:

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; by bow and arrow only; or

Aug. 22—Aug. 29
(General hunt only)

No open season

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1—Sept. 25

No open season

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side by drawing permit only; up to 25

Oct. 10—Nov. 10
(General hunt only)

Oct. 10—Nov. 10

permits may be issued in combination with Unit 7, that portion west of the Resurrection Creek Trail and north of the Sterling Highway: or

1 bull by drawing permit only;

Sept. 1—Sept. 25

No open season

Remainder of Unit 15(A)

1 bull per regulatory year, only as follows:

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side, by bow and arrow only; or

Aug. 22—Aug. 29
(General hunt only)

No open season

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1—Sept. 25
(General hunt only)

No open season

1 bull by drawing permit only;

Sept. 1—Sept. 25

No open season

Unit 15(B) Kalgin Island

1 moose per regulatory year, by registration permit only

Aug. 20—Sept. 20

Aug. 20—Sept. 20

Remainder of Unit 15(B)

1 bull per regulatory year, only as follows:

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side, by bow and arrow only; or

Aug. 22—Aug. 29
(General hunt only)

Aug. 22—Aug. 29

1 bull with spike or 50-inch antlers or antlers with

Sept. 1—Sept. 25
(General hunt only)

Sept. 1—Sept. 25

3 or more brow tines on one side; or

1 bull by drawing permit only;

Sept. 1—Sept. 25

No open season

Unit 15(C), that portion southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay.

Aug. 25—Sept. 30
(Subsistence hunt only)

No open season

1 bull by Tier II subsistence hunting permit

Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay

RESIDENT HUNTERS:

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1—Sept. 25
(General hunt only)

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 bull by drawing permit only or;

Sept. 1—Sept. 25

1 moose by targeted permit only,

Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1—Sept. 25

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 15(C)

RESIDENT HUNTERS

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1—Sept. 25
(General hunt only)

1 bull by drawing permit only or;

Sept. 1—Sept. 25

1 moose by targeted permit only;

Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

1 bull with spike or 50-inch antlers or antlers with 3 or more brow tines on one side;

Sept. 1—Sept. 25

...

There is a positive customary & traditional use (C&T) finding for moose in Unit 15B (Kalgin Island) with an amount necessary for subsistence (ANS) of 2 moose.

There is a positive C&T for moose in Unit 15C, that portion southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay with an ANS of 5–6 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal has the potential to increase bull harvest in any antler-restricted hunt by creating an additional way for a moose to be considered legal for harvest. This would represent a new definition of legal moose as described anywhere in the state.

BACKGROUND: Antler restrictions for moose harvest were first introduced to the Kenai Peninsula in 1987. A legal moose was any animal with antlers with a spike or fork on at least one side, or a spread of 50 inches wide, or 3 or more brow tines on at least one side. Since that time, antler restrictions have been modified as necessary to meet management needs. The most

restrictive antler regulations enacted were “50 inches or 4 or more brow tines on one side” due to low bull:cow ratios in 2011 and 2012. Antler restrictions have slowly become more liberal as bull:cow ratios recovered. In 2019, antler restrictions were changed to spike, or 50 inches wide, or 3 or more brow tines on at least one side. Any bull permits were also introduced, allowing managers some flexibility to adjust harvest each year. Forks have remained restricted from harvest to maintain an acceptable level of young bull harvest.

Hunters were required to seal the antlers from harvested moose from 2011-2022 on the Kenai Peninsula, allowing managers to collect information on antler configuration. For legal bulls with antlers less than 50 inches and 3 or more brow tines, 6% had 10 or more points on at least one side. For sublegal moose (less than 50 inches and less than 3 brow tines), 18% had 10 or more points on at least one antler. Having 10 points on at least one antler is not strongly correlated with older age class animals; current antler restrictions are in place to protect younger age class animals and retain appropriate levels of mature bulls in the population.

DEPARTMENT COMMENTS: The department is **OPPOSED** this proposal due to increased regulatory complexity and the potential to increase the harvest of breeding age and young bulls. The board has previously considered the same request and has not adopted the proposal. Current regulations provide hunting opportunity while protecting breeding age and young bull moose and the department changes bag limits to allow additional harvest when feasible. There is a requirement for all moose hunters in Units 7 and 15 to complete an orientation to help hunters determine legality based on antler restrictions; there is a statewide mandatory education requirement for nonresident hunters to help them identify legal moose as well.

COST ANALYSIS: Adoption of this proposal will result in additional costs for the department because existing educational materials that are required in regulation will need to be updated.

PROPOSAL 97 – 5 AAC 92.540 Controlled Use Areas. Eliminate the Lower Kenai Controlled Use Area.

PROPOSED BY: Joshua Volland

WHAT WOULD THE PROPOSAL DO? This proposal removes the motorized vehicle restriction during the general moose season in Unit 15(C).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat

for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The motor vehicle restriction in Unit 15C during the general moose season would be eliminated. There is a potential for increased harvest with additional utilization of motorized vehicles in this area. This proposal does not change the applicable restrictions for a legal moose for any hunts occurring in this area.

BACKGROUND: The Lower Kenai Controlled Use Area (LKCUA) was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the Board of Game (board) adopted the selective harvest strategy of spike, fork, 50-inch antler restriction. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and In 1992, the gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. The LKCUA was further amended in 1992

to allow a window for motorized use for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

Eliminating the LKCUA has been discussed at past board meetings and has been retained each time. Some residents and local advisory committees have supported the restriction because it is thought to decrease conflicts between ATV and non-ATV users, while others want to see the restriction removed. The LKCUA does not limit the use of boats or planes for moose hunting, nor does it limit the use of motorized vehicles on state- or borough-maintained highways or graveled portions of Oilwell, Brody, and Tustumena Lake roads.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in regulatory year (RY) 22, estimated 5,522 moose (95% confidence interval: range 4,435–6,608 moose). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective of 25 bulls: 100 cows, with 28 bulls: 100 cows. Since RY2016, harvest has been within the harvest objective of 250-300 moose (Table 97-1).

Table 97-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

RY	Harvest
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is an allocative issue. Additional harvest in the area is sustainable.

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

PROPOSAL 98 – 5 AAC 92.540 Controlled Use Areas. Clarify the types of roads motorized vehicles can be used on for moose hunting, and reduce the size of the controlled use area.

PROPOSED BY: Homer Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal amends the language of the 15(C) motorized use closure to allow the use of motorized vehicles on all platted and improved (graveled, asphalted, or paved) borough, state, or municipal roads and removes the lands south of Kachemak Bay, Kachemak Creek, Bradley River and Bradley Lake from the closure.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II

permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The motor vehicle restriction in 15C would be amended to allow motorized vehicle use on all platted and improved (graveled, asphalted, or paved) borough, state, or municipal roads during the general moose season and the closure would no longer apply to the lands south of Kachemak Bay, Kachemak Creek, Bradley River and Bradley Lake.

BACKGROUND:

The Lower Kenai Controlled Use Area (LKCUA) was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the Board of Game (board) adopted the selective harvest strategy of spike, fork, 50-inch antler restriction. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and In 1992, the gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. The LKCUA was further amended in 1992 to allow a window for motorized use for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

Eliminating the LKCUA has been discussed at past board meetings and has been retained each time. Some residents and local advisory committees have supported the restriction because it is thought to decrease conflicts between ATV and non-ATV users, while others want to see the restriction removed. The LKCUA does not limit the use of boats or planes for moose hunting, nor does it limit the use of motorized vehicles on state- or borough-maintained highways or graveled portions of Oilwell, Brody, and Tustumena Lake roads.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in regulatory year (RY) 22, estimated 5,522 moose (95% confidence interval: range 4,435–6,608 moose). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective of 25 bulls: 100 cows, with 28 bulls: 100 cows. Since RY2016, harvest has been within the harvest objective of 250-300 moose (Table 98-1).

Table 98-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

RY	Harvest
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

During the winter of 2024 the Homer and Seldovia Advisory Committees held a series of community meetings to address possible changes in this regulation. Multiple alternatives were discussed including:

1. To exempt the south side of Kachemak Bay from the regulations
2. To amend the language so that moose hunters could use motorized vehicles on all platted and developed (graveled) borough, state, and municipal roads.
3. A provision to allow the transport of meat after dark.
4. Allow an exemption for individuals 65 or older or with a 70% disability.
5. Amend the closure to apply to all big game hunting.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. The department does not maintain road status information that may be necessary for hunters.

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

PROPOSAL 99 – 5 AAC 92.540 Controlled Use Areas. Reduce the size of the Lower Kenai Controlled Use Area.

PROPOSED BY: Seldovia Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove lands south of the Fox River and Kachemak Bay from the Lower Kenai Controlled Use Area.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would allow moose hunters to use motorized vehicles for moose hunting south of the Fox River and Kachemak Bay for the entire moose hunting season.

BACKGROUND: The Lower Kenai Controlled Use Area was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the selective harvest strategy of spike, fork, 50-inch antler restriction was adopted. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and in 1992, gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. It was further amended in 1992 to allow a window for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

During the winter of 2024 the Homer and Seldovia Advisory Committees held a series of community meetings to address possible changes in this regulation. Multiple alternatives were discussed including:

1. To exempt the south side of Kachemak Bay from the regulations
2. To amend the language so that moose hunters could use motorized vehicles on all platted and developed (graveled) borough, state, and municipal roads.
3. A provision to allow the transport of meat after dark.
4. Allow an exemption for individuals 65 or older or with a 70% disability.
5. Amend the closure to apply to all big game hunting.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in RY22, estimated 5,522 moose (95% CI: range 4,435–6,608). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective, (25 bulls: 100 cows), at 28 bulls: 100 cows. Since RY2016, harvest has been within objectives of 250-300 moose (Table 99-1).

Table 99-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

<u>RY</u>	<u>Harvest</u>
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. The department does not maintain road status information that may be necessary for hunters.

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

PROPOSAL 100 – 5 AAC 92.540 Controlled Use Areas. Reduce the size of the Lower Kenai Controlled Use Area, clarify the types of roads motorized vehicles can be used on, change the regulation to be applicable to big game only, and eliminate the use of aircraft.

PROPOSED BY: Dan Miotke

WHAT WOULD THE PROPOSAL DO? This proposal amends the language of the 15(C) motorized use closure to allow the use of motorized vehicles on all platted and improved (graveled, asphalted, or paved) borough, state, or municipal roads, disallows the use of aircraft for spotting moose during the closed period, applies the regulation to all big game species, and removes the regulation south of Kachemak Bay and the Bradley Lake watershed.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The motor vehicle restriction in 15C would be amended to allow motorized vehicle use on all platted and improved (graveled, asphalted, or paved) borough, state, or municipal roads during the general moose season, disallow the use of aircraft for moose spotting during the closed period, apply the regulation to the hunting of all big game species, and exempt the area south of Kachemak Bay and the Bradley Lake watershed. The proposal may clarify which roads motorized vehicles are allowed on, and extend the restriction to include prohibiting the use of aircraft, and will be applicable to all species, the impacts of which to harvest are unknown.

BACKGROUND: The Lower Kenai Controlled Use Area was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the selective harvest strategy of spike, fork, 50-inch antler restriction was adopted. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and in 1992, gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. It was further amended in 1992 to allow a window for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

During the winter of 2024 the Homer and Seldovia Advisory Committees held a series of community meetings to address possible changes in this regulation. Multiple alternatives were discussed including:

1. To exempt the south side of Kachemak Bay from the regulations
2. To amend the language so that moose hunters could use motorized vehicles on all platted and developed (graveled) borough, state, and municipal roads.
3. A provision to allow the transport of meat after dark.
4. Allow an exemption for individuals 65 or older or with a 70% disability.
5. Amend the closure to apply to all big game hunting.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in RY22, estimated 5,522 moose (95% CI: range 4,435–6,608). In 2025, the post hunting season bull to cow

ratio in 15C was above the population objective, (25 bulls: 100 cows), at 28 bulls: 100 cows. Since RY2016, harvest has been within objectives of 250-300 moose (Table 100-1).

Table 100-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

RY	Harvest
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. The department does not maintain road status information that may be necessary for hunters. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 101 – 5 AAC 92.540 Controlled Use Areas. Eliminate the Lower Kenai Controlled Use Area.

PROPOSED BY: Don Bumbalough

WHAT WOULD THE PROPOSAL DO? This proposal removes the motorized vehicle restriction during the general moose season in Unit 15(C).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat

for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The Lower Kenai Controlled Use Area would be eliminated. There is a potential for increased harvest with additional utilization of motorized vehicles in this area. This proposal does not change the applicable restrictions for a legal moose for any hunts occurring in this area.

BACKGROUND: The Lower Kenai Controlled Use Area was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the selective harvest strategy of spike, fork, 50-inch antler restriction was adopted. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and in 1992, gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. It was further amended in 1992 to allow a window for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

Eliminating the LKCUA has been discussed at past board meetings and has been retained each time. Some residents and local advisory committees have supported the restriction because it is thought to decrease conflicts between ATV and non-ATV users, while others want to see the restriction removed. The LKCUA does not limit the use of boats or planes for moose hunting, nor does it limit the use of motorized vehicles on state- or borough-maintained highways or graveled portions of Oilwell, Brody, and Tustumena Lake roads.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in RY22, estimated 5,522 moose (95% CI: range 4,435–6,608). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective, (25 bulls: 100 cows), at 28 bulls: 100 cows. Since RY2016, harvest has been within objectives of 250-300 moose (Table 101-1).

Table 101-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

RY	Harvest
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. The department does not maintain road status information that may be necessary for hunters. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 102 – 5 AAC 92.540 Controlled Use Areas. Eliminate the Lower Kenai Controlled Use Area.

PROPOSED BY: Robert Mathis

WHAT WOULD THE PROPOSAL DO? This proposal removes the motorized vehicle restriction during the general moose season in Unit 15(C).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The motor vehicle restriction in Unit 15C during the general moose season would be eliminated. There is a potential for increased harvest with additional utilization of motorized vehicles in this area. This proposal does not change the applicable restrictions for a legal moose for any hunts occurring in this area.

BACKGROUND: The Lower Kenai Controlled Use Area was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the selective harvest strategy of spike, fork, 50-inch antler restriction was adopted. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and in 1992, gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. It was further amended in 1992 to allow a window for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

Eliminating the LKCUA has been discussed at past board meetings and has been retained each time. Some residents and local advisory committees have supported the restriction because it is thought to decrease conflicts between ATV and non-ATV users, while others want to see the restriction removed. The LKCUA does not limit the use of boats or planes for moose hunting, nor does it limit the use of motorized vehicles on state- or borough-maintained highways or graveled portions of Oilwell, Brody, and Tustumena Lake roads.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in RY22, estimated 5,522 moose (95% CI: range 4,435–6,608). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective, (25 bulls: 100 cows), at 28 bulls: 100 cows. Since RY2016, harvest has been within objectives of 250-300 moose (Table 102-1).

Table 102-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

<u>RY</u>	<u>Harvest</u>
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. The department does not maintain road status information that may be necessary for hunters.

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

PROPOSAL 103 – 5 AAC 92.540 Controlled Use Areas. Modify the Lower Kenai Controlled Use Area to allow motorized vehicle use on weekends only.

PROPOSED BY: Arn Johnson

WHAT WOULD THE PROPOSAL DO? This proposal would modify the current regulation in Unit 15C such that the current motorized restrictions would be in effect from September 8 through the end of moose season, with exceptions for motorized vehicle use allowed on weekend days (Saturday and Sunday).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

(4) Unit 15:

(B) the Lower Kenai Controlled Use Area:

(i) the area consists of Unit 15(C);

(ii) the area is closed to the use of any motorized vehicle except an aircraft or boat for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Regulations on motorized vehicle restrictions in Unit 15C would be modified such that the current restrictions would be in effect from Sept. 8 through the end of moose season with exceptions for motorized vehicle use on weekends (Saturday and Sunday) only. The number of motorized closed days would fluctuate from 12 to 14 days each calendar year.

BACKGROUND: The Lower Kenai Controlled Use Area was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the selective harvest strategy of spike, fork, 50-inch antler restriction was adopted. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and in 1992, gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. It was further amended in 1992 to allow a window for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

Eliminating the LKCUA has been discussed at past board meetings and has been retained each time. Some residents and local advisory committees have supported the restriction because it is thought to decrease conflicts between ATV and non-ATV users, while others want to see the restriction removed. The LKCUA does not limit the use of boats or planes for moose hunting, nor does it limit the use of motorized vehicles on state- or borough-maintained highways or graveled portions of Oilwell, Brody, and Tustumena Lake roads.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in RY22, estimated 5,522 moose (95% CI: range 4,435–6,608). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective, (25 bulls: 100 cows), at 28 bulls: 100 cows. Since RY2016, harvest has been within objectives of 250-300 moose (Table 103-1).

Table 103-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

RY	Harvest
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 104 – 5 AAC 92.540 Controlled Use Areas. Modify the Lower Kenai Controlled Use Area to allow the use of motorized vehicles at night.

PROPOSED BY: Michael Basargin

WHAT WOULD THE PROPOSAL DO? This proposal would modify the current motorized restrictions in Unit 15C such that motorized vehicles could be used from 10 p.m. to 5 a.m. on Sept. 16–19 and Sept. 22–25.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.540

- (4) Unit 15:
 - (B) the Lower Kenai Controlled Use Area:
 - (i) the area consists of Unit 15(C);
 - (ii) the area is closed to the use of any motorized vehicle except an aircraft or boat for moose hunting, including the transportation of moose hunters, their hunting gear, or parts of moose from September 16 through September 19 and September 22 through September 25; however, this provision does not apply to the use of a motorized

vehicle on a highway maintained by the state or borough or on the gravel portions of Oilwell, Brody, and Tustumena lake Roads or a driveway used for direct access to a primary residence or business;

(iii) during the periods specified in (ii) of this subparagraph, a hunter who travels by motorized vehicle on the Unit 15(C) highway system and then leaves and travels off that highway system in that motorized vehicle may not hunt moose, including transporting moose hunters, their hunting gear, or parts of moose, or in any other manner initiate or participate in moose hunting activities until after the hunter returns the motorized vehicle to the Unit 15(C) highway system; upon returning the motorized vehicle to that highway system, the hunter may initiate or participate in legal moose hunting activities so long as the hunter leaves the motorized vehicle on the Unit 15(C) highway system

...

The LKCUA is located in Unit 15C, which is largely within the boundaries of the Anchorage-MatSu Nonsubsistence Area (NSA); there are no customary and traditional uses of wild resources within an NSA. A small portion of Unit 15C lies within the LKCUA but outside of the boundaries of the NSA; in that small area of Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, the board made a positive customary and traditional use finding for moose and determined an amount reasonably necessary for subsistence of 5–6 moose. The only moose hunting that occurs in this area is conducted under a Tier II permit since the board has determined that the moose population in this area cannot provide for all subsistence uses. This proposal does not occur in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Motorized restrictions in Unit 15C would be modified such that the regulations prohibiting motorized vehicle use would be lifted from 10 p.m. to 5 a.m. each day during the current closure period.

BACKGROUND: The Lower Kenai Controlled Use Area was originally established in 1985 to ease hunting pressure in trail accessible portions of 15C. However, it did not fully meet goals for moose management and the selective harvest strategy of spike, fork, 50-inch antler restriction was adopted. The motorized restrictions remained in place at the request of users. In 1987, the regulation was modified to define highway as a borough-maintained road and in 1992, gravel portions of Oilwell and Broady Roads were exempted due to high use by road hunters and hunters accessing other hunting areas. It was further amended in 1992 to allow a window for the removal of meat from the field. In 2005, Tustumena Lake Road and private drives were added as exemptions from the regulation.

Eliminating the LKCUA has been discussed at past board meetings and has been retained each time. Some residents and local advisory committees have supported the restriction because it is thought to decrease conflicts between ATV and non-ATV users, while others want to see the restriction removed. The LKCUA does not limit the use of boats or planes for moose hunting,

nor does it limit the use of motorized vehicles on state- or borough-maintained highways or graveled portions of Oilwell, Brody, and Tustumena Lake roads.

Currently the moose population in 15C is above the upper end of the Intensive Management population objective of 3,500 moose. The most recent GSPE surveys, conducted in RY22, estimated 5,522 moose (95% CI: range 4,435–6,608). In 2025, the post hunting season bull to cow ratio in 15C was above the population objective, (25 bulls: 100 cows), at 28 bulls: 100 cows. Since RY2016, harvest has been within objectives of 250-300 moose (Table 104-1).

Table 104-1. Total moose harvest, by regulatory year in Unit 15C, Kenai Peninsula, Alaska

RY	Harvest
2015	180
2016	204
2017	179
2018	220
2019	321
2020	311
2021	278
2022	269
2023	239
2024	286

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

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

PROPOSAL 105 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Close all sheep hunts in Units 7 and 15.

PROPOSED BY: Kneeland Taylor

WHAT WOULD THE PROPOSAL DO? This proposal would close Dall sheep hunting in Units 7 and 15.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4) Unit 7, that portion south of the Sterling Highway, west of the Seward Highway, and north and east of Kenai Lake; up to 50 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by drawing permit only	Aug. 10—Sept. 20 (General hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or Larger, every 4 regulatory years, by drawing permit only		Aug. 10—Sept. 20
Units 7 and 15(A), those portions east of Fuller Lake trail, south of Dike Creek, and a straight line from the source of Dike Creek, east through the divide south of Trout Lake, to Juneau Creek, west of Juneau creek, and north of the Sterling Highway; up to 10 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horn or Larger, drawing permit only	Aug. 10—Sept. 20 (General hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or larger, every 4 regulatory years, by drawing permit only		Aug. 10—Sept. 20
Remainder of Unit 7, Unit 9, Remainder of Unit 13, remain-		

Der of Unit 14(A), Unit 14(B),
Remainder of Unit 15, and
Units 16, 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; Aug. 10—Sept. 20

NONRESIDENT HUNTERS:

Aug. 1—Aug. 5

1 ram with full-curl horn or
larger, by youth hunt only; or

1 ram with full-curl horn or
larger, every 4 regulatory years Aug. 10—Sept. 20

...

All sheep habitat in Units 7 and 15 is located within the Anchorage-Matsu-Kenai
Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This
proposal would eliminate all state Dall sheep hunting opportunity in Units 7 and 15. If adopted
this would be a significant reduction in hunting opportunity.

BACKGROUND: All state harvest on the Kenai Peninsula is under full curl management. The
current state hunt structure includes two drawing hunt areas including Round Mountain and
Crescent Lake. The remainder of Units 7 and 15 are managed under a general season harvest
ticket hunt. The 5-year average annual harvest for the Kenai Peninsula, including federal
subsistence harvest, is 7 sheep per year (Figure 105-1). Currently there are two federal
subsistence hunts in Units 7 and 15, available by drawing permit, with bag limits of 1 ram with
full curl, and 1 ram with $\frac{3}{4}$ curl respectively. Closure of state managed sheep hunts in Units 7 &
15 will not remove all sheep harvest opportunity from Units 7 & 15.

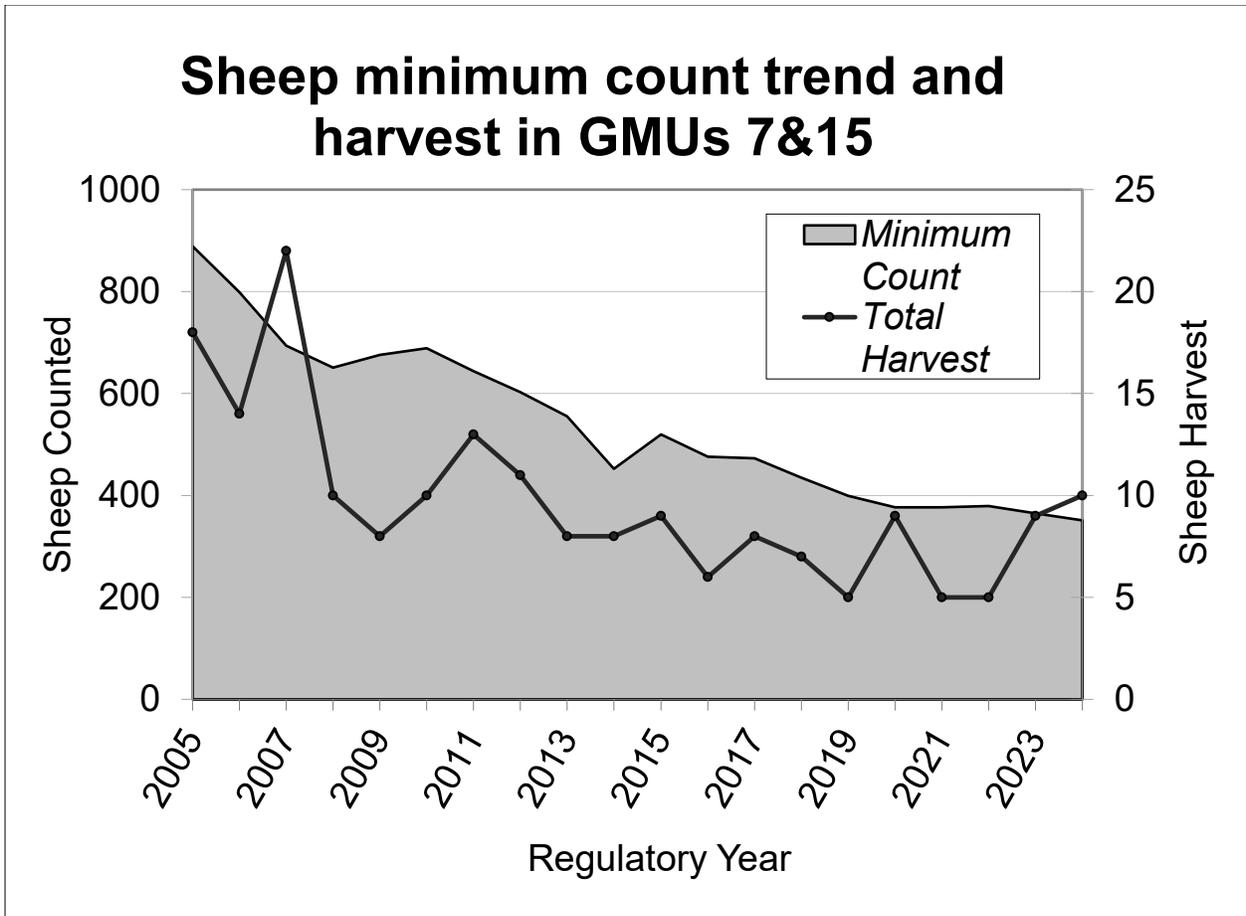


Figure 105-1. Sheep minimum count trend and total harvest in GMUs 7&15, 2005-2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal due to loss of sheep hunting opportunity. Kenai sheep are harvested under full curl management and there is no biological justification for a closure currently.

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

PROPOSAL 106 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Change all harvest ticket sheep hunts in Units 7 and 15 to registration permits, and change the bag limit for the youth hunts to once in a lifetime.

PROPOSED BY: Dan Miotke

WHAT WOULD THE PROPOSAL DO? This proposal would change all Dall sheep hunts in Units 7 and 15 to registration hunts, and would limit youth hunters to harvest one sheep per lifetime in those hunts.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in **5 AAC 85.055 Hunting seasons and bag limits for Dall sheep.**

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4) Unit 7, that portion south of the Sterling Highway, west of the Seward Highway, and north and east of Kenai Lake; up to 50 permits may be issued	Aug. 10—Sept. 20 (General hunt only)	
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by drawing permit only		
NONRESIDENT HUNTERS: 1 ram with full-curl horn or Larger, every 4 regulatory years, by drawing permit only		Aug. 10—Sept. 20
Units 7 and 15(A), those portions east of Fuller Lake trail, south of Dike Creek, and a straight line from the source of Dike Creek, east through the divide south of Trout Lake, to Juneau Creek, west of Juneau creek, and north of the Sterling Highway; up to 10 permits may be issued		

RESIDENT HUNTERS:

1 ram with full-curl horn or
Larger, drawing permit only Aug. 10—Sept. 20
(General hunt only)

NONRESIDENT HUNTERS:

1 ram with full-curl horn or
larger, every 4 regulatory years, by drawing permit only Aug. 10—Sept. 20

Remainder of Unit 7, Unit 9,
Remainder of Unit 13, remain-
Der of Unit 14(A), Unit 14(B),
Remainder of Unit 15, and
Units 16, 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; Aug. 10—Sept. 20

NONRESIDENT HUNTERS:

5 Aug. 1—Aug.
1 ram with full-curl horn or
larger, by youth hunt only; or

1 ram with full-curl horn or
larger, every 4 regulatory years Aug. 10—
Sept. 20

...

All sheep habitat in Units 7 and 15 is located within the Anchorage-Matsu-Kenai
Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted,
this proposal is not expected to have a biological effect because harvest is currently managed
under full curl regulations and sheep sealing is required. Youth hunters would only be able to
harvest one sheep per lifetime during the youth hunts. Once adults, the successful youth hunters
would be eligible to harvest another sheep. Registration permits are administered with stricter
reporting requirements than general season harvest ticket hunts, and there are no proposed limits
on the number of registration permits to be issued or limited availability dates or locations, so
functionally the registration hunt may be no different than the harvest ticket.

BACKGROUND: Dall sheep numbers on the Kenai Peninsula have declined by approximately 80% since the 1960s (Figure 106-1). All state harvest on the Kenai Peninsula is under full curl management. The current state hunt structure includes 2 drawing hunt areas including Round Mountain and Crescent Lake. Round Mountain opened for one drawing permit in 2025 after being closed for 4 years. Crescent Lake has remained closed. These areas have not been open to state harvest in recent years due to a lack of legal rams available for harvest and low sheep numbers as observed by the department during minimum count surveys. The remainder of Units 7 and 15 are managed under a general season harvest ticket hunt. The 5-year average annual harvest for the Kenai Peninsula, including federal subsistence harvest, is 7 sheep per year.

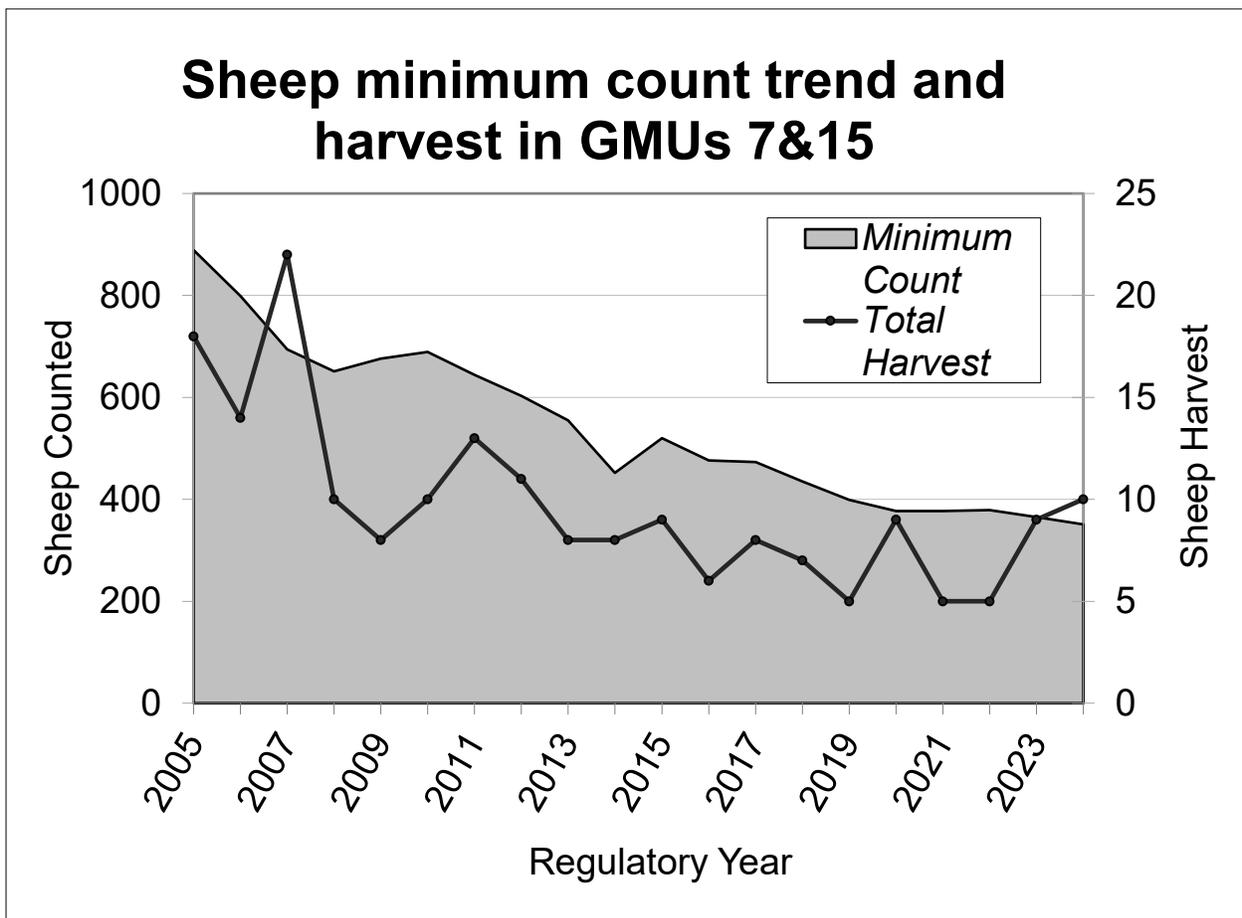


Figure 106-1. Sheep minimum count trend and total harvest in GMUs 7&15, 2005-2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Harvest is regulated by full curl management, which does not negatively impacting sheep population levels. The existing full-curl bag limit for the youth hunt is not negatively impacting sheep populations, and to date no youth hunters have harvested multiple sheep in Units 7 and 15 since it was first established in RY16, and only 4 sheep have been taken in the youth hunt in these units.

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

PROPOSAL 107 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Change all sheep hunting in Units 7 and 15 to drawing permit only.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? This proposal would change all Dall sheep hunts in Units 7 and 15 to drawing permit hunts.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4) Unit 7, that portion south of the Sterling Highway, west of the Seward Highway, and north and east of Kenai Lake; up to 50 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by drawing permit only	Aug. 10—Sept. 20 (General hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or Larger, every 4 regulatory years, by drawing permit only		Aug. 10—Sept. 20
Units 7 and 15(A), those portions east of Fuller Lake trail, south of Dike Creek, and a straight line from the source of Dike Creek, east through the divide south of Trout Lake, to Juneau Creek, west of Juneau creek, and north of the Sterling Highway; up to 10 permits may be issued		

for 4 years. Crescent Lake has remained closed. These areas have not been open to state harvest in recent years due to a lack of legal rams available for harvest and low sheep numbers as seen during minimum count surveys. The remainder of Units 7 and 15 are managed under a general season harvest ticket hunt. The 5-year average annual harvest for the Kenai Peninsula, including federal subsistence harvest, is 7 sheep per year.

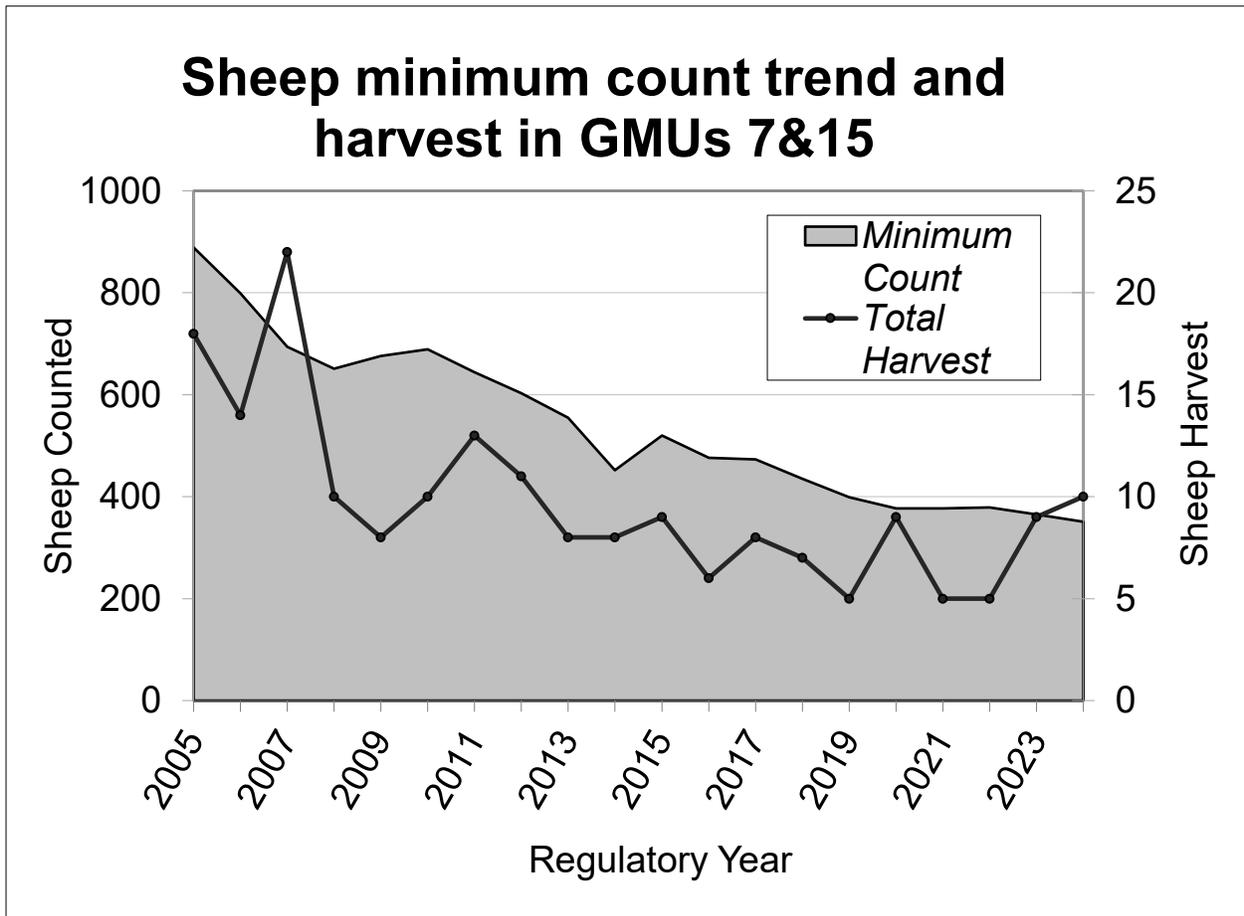


Figure 107-1. Sheep minimum count trend and total harvest in GMUs 7&15, 2005-2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Harvest is regulated by full curl management, minimizing most concerns of harvest negatively impacting sheep population levels. The board will need to decide if it would like to continue to provide a youth hunting opportunity separate from the new drawing permit hunt, and will also need to establish “up to” numbers for drawing permit hunts to be issued in the areas currently open by harvest ticket only.

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

PROPOSAL 108 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Change some or all of the general season sheep hunts in Units 7 and 15 to archery only.

PROPOSED BY: Paul Forward

WHAT WOULD THE PROPOSAL DO? This proposal would change all or some of (which hunts are not clear in the proposal) the current general season harvest ticket sheep hunt in Units 7 and 15 to an archery-only weapons restricted hunt.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4) Unit 7, that portion south of the Sterling Highway, west of the Seward Highway, and north and east of Kenai Lake; up to 50 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horn or larger, by drawing permit only	Aug. 10—Sept. 20 (General hunt only)	
NONRESIDENT HUNTERS: 1 ram with full-curl horn or Larger, every 4 regulatory years, by drawing permit only		Aug. 10—Sept. 20
Units 7 and 15(A), those portions east of Fuller Lake trail, south of Dike Creek, and a straight line from the source of Dike Creek, east through the divide south of Trout Lake, to Juneau Creek, west of Juneau creek, and north of the Sterling Highway; up to 10 permits may be issued		
RESIDENT HUNTERS: 1 ram with full-curl horn or Larger, drawing permit only	Aug. 10—Sept. 20 (General hunt only)	

NONRESIDENT HUNTERS:

1 ram with full-curl horn or larger, every 4 regulatory years, by drawing permit only

Aug. 10—Sept. 20

Remainder of Unit 7, Unit 9, Remainder of Unit 13, remainder of Unit 14(A), Unit 14(B), Remainder of Unit 15, and Units 16, 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;

Aug. 10—Sept. 20

NONRESIDENT 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, every 4 regulatory years

Aug. 10—Sept. 20

...

All sheep habitat in Units 7 and 15 is located within the Anchorage-Matsu-Kenai Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would limit the current general season harvest ticket sheep hunt in Units 7 and 15 to archery-only with a bag limit of 1 ram full curl or larger and season dates of Aug. 10–Sept. 20. Adoption of this proposal is likely to result in a decrease in harvest as harvest success rates in archery hunting are typically lower than other means.

BACKGROUND: Dall sheep numbers on the Kenai Peninsula have declined by approximately 80% since the 1960s (Figure 108-1). All state harvest on the Kenai Peninsula is under full curl management. The current state hunt structure includes two drawing hunt areas including Round Mountain and Crescent Lake. Round Mountain opened for one permit in 2025 after being closed for 4 years. Crescent Lake has remained closed. These areas have not been open to state harvest in recent years due to a lack of legal rams available for harvest and low sheep numbers as seen during minimum count surveys. The remainder of Units 7 and 15 are managed under a general

season harvest ticket hunt. The 5-year average annual harvest for the Kenai Peninsula, including federal subsistence harvest, is 7 sheep per year.

Only 1 sheep has been harvested by bow and arrow on the Kenai since harvest reporting began documenting method of take in 2004.

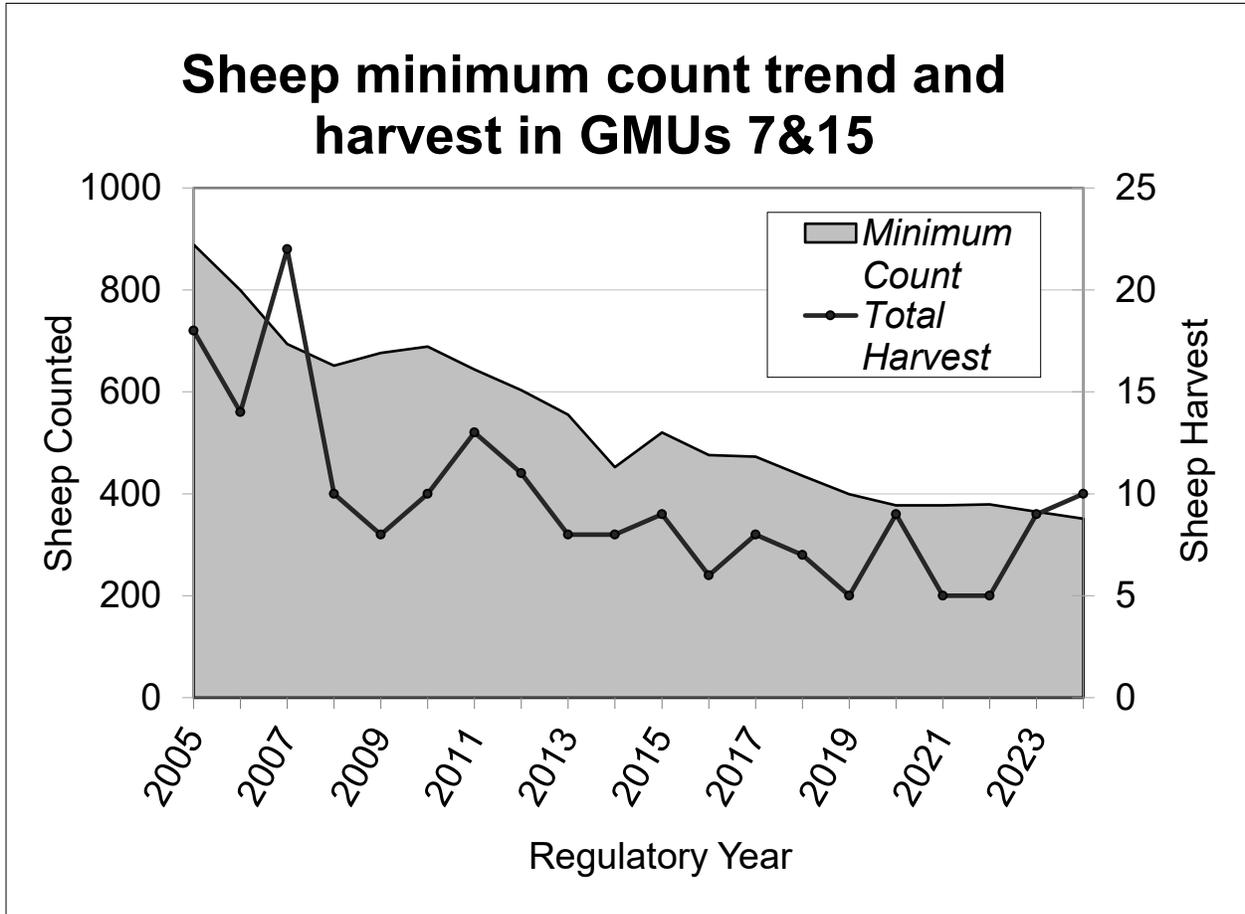


Figure 108-1. Sheep minimum count trend and total harvest in GMUs 7&15, 2005-2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. Changing the method of take would have no biological effect on the population but would reduce opportunity for non-archery hunters to harvest a sheep.

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

PROPOSAL 134 – 5 AAC 85.015(3). Hunting seasons and bag limits for black bear. Shorten the resident black bear season, change the hunt to a drawing permit, and close the nonresident black bear hunt in a portion of Units 7 and 15C.

PROPOSED BY: Quentin McMullen

WHAT WOULD THE PROPOSAL DO? This proposal would close nonresident black bear hunting in a portion of Unit 7 and 15C, and change the resident season to September 1–June 30 by drawing permit, with a bag limit of 1 bear, and a maximum of 500 permits available.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.015 are:

Units and Bag Limits (3)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
<p>Unit 7, that portion south of The city limits of Seward at 60* 04' 58" N. lat., and Unit 15, that portion south of Kachemak Creek, Bradley River, and Bradley Lake</p>	<p>RESIDENT HUNTERS: (3 bears)</p> <p>No closed season (General hunt only)</p>	<p>NONRESIDENT HUNTERS: (1 bear)</p> <p>No closed season</p>
<p>Remainder of Units 7 and 15</p>	<p>RESIDENT HUNTERS: (3 bears)</p> <p>No closed season (General hunt only)</p>	<p>NONRESIDENT HUNTERS: (3 bears)</p> <p>No closed season</p>
<p>...</p>		

There is a positive customary and traditional use (C&T) finding for black bear in Unit 15C outside of the Anchorage-MatSu-Kenai nonsubsistence area (NSA), and an amount reasonably necessary for subsistence of 20–60 bears. Unit 7 is within the NSA, therefore there are no customary and traditional uses of black bear in this unit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal was adopted, nonresident hunters would no longer be able to harvest black bears in the portions of Unit 7 and Unit 15C south of the city limits of Seward at 60° 04' 58" north latitude and south of Bradley River, Bradley Lake, and Kachemak Creek. This proposal would reduce opportunities for both hunters and guides. Bag limits for resident hunters would decrease to 1 bear per year and hunters would be required to obtain a drawing permit. A maximum of 500 permits would be issued. It is likely that overall black bear harvest would be reduced in these areas.

BACKGROUND: Black bears are an important resource to local communities in Units 7 and 15C for both meat and economic opportunity. On average, more black bears are harvested on the Kenai Peninsula in a year than moose (532 black bears vs. 435 moose, 5-year avg.). In the most recent 5 years, 87% of resident hunters and 78% of nonresidents salvaged their bear meat. A substantial number of guides and transporters (more than 25) work out of the coastal communities in Units 7 and 15C. Accordingly, the nonresident harvest is much higher in coastal areas (37% in 15C) than in non-coastal portions (9% in 15A) of the Kenai Peninsula. Hunting regulations for resident and nonresident hunters have not changed since 2011 when the current regulations were established. All harvested bears are required to be sealed. Prior to 2011, no separate bag limit existed for residents and nonresidents for the coastal portions of the Kenai Peninsula. The bag limit has varied between 1-3 bears in the spring and 1 bear in the fall. Black bear population monitoring is limited to harvest data, anecdotal observations from biologists and hunters, and limited data collected during mountain goat and salmon surveys.

The department collects information on subsistence uses of black bears through subsistence comprehensive household harvest surveys. Table 134-1 shows all available household survey information from 1982 – 2023 for the Lower Cook Inlet communities of Nanwalek, Port Graham, and Seldovia. Eighty-two percent of households in Nanwalek used black bear in a single study year.

Table 134-1. Number of black bears harvested, percent of households harvesting black bears, and percent of households using black bears in Nanwalek, Port Graham, and Seldovia, 1982-2023.

	Nanwalek			Port Graham			Seldovia			Total bear harvest
	Bear harvest	Percent harvesting	Percent using	Bear harvest	Percent harvesting	Percent using	Bear harvest	Percent harvesting	Percent using	
1982	-	-	-	-	-	-	5	3%	*	5
1987	6	9%	52%	1	2%	9%	-	-	-	7
1989	5	9%	33%	0	0%	2%	-	-	-	5
1990	5	9%	54%	2	4%	35%	-	-	-	7
1991	8	14%	76%	7	10%	43%	9	6%	18%	24
1992	15	16%	75%	2	4%	33%	11	5%	20%	28
1993	11	18%	82%	1	2%	16%	0	0%	11%	12
1997	10	14%	66%	3	5%	23%	-	-	-	13
2003	5	18%	64%	6	4%	23%	-	-	-	11
2014	2	4%	18%	1	2%	10%	3	2%	21%	6
2023	-	-	-	3	5%	11%	-	-	-	3

*Percent of households using by species was not collected in 1982

-No survey conducted for this year

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it is an unnecessary reduction in opportunity. There is currently no biological concern given consistent harvest and observations for the population of black bears on the Kenai Peninsula. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted; and the board has not yet found that drawing permits can provide for subsistence opportunity.

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

PROPOSAL 135 – Change management of RB300 (Units 7 and 15, Kenai Peninsula Brown Bear) human-caused mortality tracking from a calendar year to regulatory year and/or split mortality caps between spring and fall seasons.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would direct the department to manage the RB300 mortality limit from calendar year to regulatory year. It also suggests splitting human-caused mortality limit between spring and fall seasons.

WHAT ARE THE CURRENT REGULATIONS?

**Findings for the Alaska Board of Game
2015-211-BOG
Board Recommendation to the Department of Fish and Game
Provided during the Southcentral Region Meeting
March 18, 2015**

The Board of Game finds as follows, based on information provided by Department staff, Alaska residents and other wildlife users:

The Board recommended the Department take the following management action:

Establish a maximum of human-caused mortality quota of no more than 50-60 brown bears, with no more than 8-12 of these adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(6)		
Unit 7		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30
(14)		
Unit 15		
1 bear every regulatory year by registration permit only	Aug.10—June 30 (General hunt only)	Aug.10—June 30

...

Most of Units 7 and 15 are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and the subsistence priority does not apply. The portion of Unit 15C outside of the NSA has a negative C&T finding for brown bear, and there are no brown bears on Kalgin Island in Unit 15B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require the department to manage the RB300 brown bear mortality limit, in Units 7 & 15, from a calendar year to regulatory year. In 2022 and 2024, emergency orders were issued when mortality caps were reached during the spring and early summer, effectively closing brown bear hunting opportunities for the following fall. Changing management of this hunt to a regulatory year could ensure the fall season opportunity remains open in most years, however the season may be closed by emergency order earlier in the spring.

This proposal also suggests splitting the mortality cap between spring and fall, but does not support increasing the total number of human-caused mortalities in the cap.

BACKGROUND: Regulations regarding brown bear hunting in Units 7 and 15 have undergone many changes over the last decade. This has included changes in season dates, method of take, and objectives for allowable human-caused mortality.

The current ranges were established in 2015 by the board. These findings direct the department to establish a maximum human-caused mortality of no more than 50-60 brown bears, with no more than 8-12 of these being adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15. Mortalities are calculated on a 3-year running average.

The department monitors the RB300 hunt closely and uses emergency orders to manage the harvest. In calendar year 2022, the mortality cap of adult sows was reached, prompting an emergency order (No. 02-05-22) closing the fall portion of the season on September 30, 2022 (Tables 135-1 & 135-2). The RB300 season reopened at the start of the new calendar year (January 1, 2023). At the 2023 South Central Board of Game meeting, Proposal 134 was adopted, extending the RB300 season dates by 52 days (previously September 1–May 31 and now August 10–June 30). In 2024, the mortality cap for adult sows was again reached. Accordingly, the RB300 season was closed by emergency order (No. R2-03-24) effective July 1, 2024 through the remainder of the calendar year, closing the fall season of the hunt.

Table 135-1. Annual occurrences of known human-caused mortalities of brown bears in Game Management Units 7 & 15 in Alaska.

Calendar Year	Hunting Mortality	Non-Hunting Human Caused Mortality	Total
2015	27	4	31
2016	44	13	57
2017	38	9	47
2018	33	13	46
2019	40	8	48
2020	72	11	83
2021	35	5	40
2022	48	9	57
2023	40	7	47

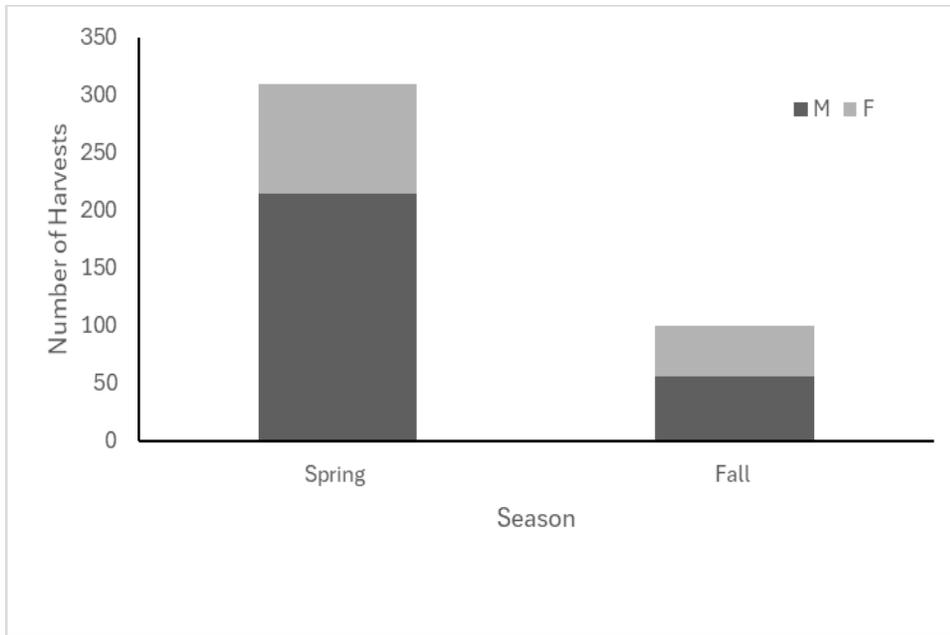
2024	56	9	65
2025	41	1	42

Table 135-2. Annual occurrences of known human-caused mortalities of adult female brown bears in Game Management Units 7 & 15 in Alaska.

Calendar Year	Hunting Mortality	Non-Hunting Human Caused Mortality	Total
2015	8	0	8
2016	3	2	5
2017	3	0	3
2018	5	4	9
2019	5	1	6
2020	14	2	16
2021	4	1	5
2022	12	3	15
2023	7	3	10
2024	12	2	14
2025	8	0	8

Since 2015, an average of 76% of the harvest under the RB300 permit occurs during the spring season (Figure 135-1). Reaching mortality caps early in the management year reduces variation available for additional human-caused mortalities (e.g., defense of life and property). Managing by regulatory year would help ensure a fall RB300 season while hunters are in the field pursuing other species like moose, sheep, and caribou. Under the regulatory year strategy, if mortality caps are reached and an EO issued, it is likely to occur in the mid- to late spring season when hunters are specifically targeting bears and when fewer hunting seasons are happening concurrently. Baiting for brown bears is legal in Units 7 and 15, and for regulatory years 2015-2024, of the 565 brown bears sealed, 250 were taken over bait. Of the 565 taken, 76% of the total harvest (365) were taken in the spring.

Figure 135-1. Number of brown bear harvest mortalities by sex occurring during spring and fall in Game Management Units 7 & 15 in Alaska, 2015–2025.



Splitting mortality limits by spring and fall seasons would add complexity to RB300 regulations and management structure, with the potential to have multiple emergency orders issued in one management year (i.e. opening and closing EO's for each spring and fall season). This could create confusion from hunters about season status, along with requiring additional staff time to track the divided limits.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposal because it is allocative and the department can manage under existing findings or proposed findings. Most bear hunting is done in the spring, and changing to a regulatory year allocates more brown bear hunting opportunity to the fall season.

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

PROPOSAL 136 – Change the management of the RB300 (Units 7 and 15, Kenai Peninsula Brown Bear) brown bear mortality tracking from calendar year to regulatory year.

PROPOSED BY: Dave Lyon

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would require the department to manage the RB300 mortality limit from calendar year to regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

**Findings for the Alaska Board of Game
2015-211-BOG
Board Recommendation to the Department of Fish and Game
Provided during the Southcentral Region Meeting
March 18, 2015**

The Board of Game finds as follows, based on information provided by Department staff, Alaska residents and other wildlife users:

The Board recommended the Department take the following management action:

Establish a maximum of human-caused mortality quota of no more than 50-60 brown bears, with no more than 8-12 of these adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(6)		
Unit 7		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30
(14)		
Unit 15		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30

...

Most of Units 7 and 15 are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and the subsistence priority does not apply. The portion of Unit 15C outside of the NSA has a negative C&T finding for brown bear, and there are no brown bears on Kalgin Island in Unit 15B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require the department to manage the RB300 brown bear mortality limit, in Units 7 & 15, from a calendar year to regulatory year. In 2022 and 2024, emergency orders were issued when mortality caps were reached during the spring and early summer, effectively closing brown bear hunting opportunities for the following fall. Changing management of this hunt to a regulatory year could ensure the fall season opportunity remains open in most years, however the season may be closed by emergency order earlier in the spring.

BACKGROUND: Regulations regarding brown bear hunting in Units 7 and 15 have undergone many changes over the last decade. This has included changes in season dates, method of take, and objectives for allowable human-caused mortality.

The current ranges were established in 2015 by the board. These findings direct the department to establish a maximum of human-caused mortality of no more than 50-60 brown bears, with no more than 8-12 of these being adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15. Mortalities are calculated on a 3-year running average.

The department monitors the RB300 hunt closely and uses emergency orders to manage the harvest. In calendar year 2022, the mortality cap of adult sows was reached, prompting an emergency order (No. 02-05-22) closing the fall portion of the season on Sept. 30, 2022 (Tables 136-1 & 136-2). The RB300 season reopened at the start of the new calendar year (Jan. 1, 2023). At the 2023 South Central Board of Game meeting, Proposal 134 was adopted, extending the RB300 season dates by 52 days (previously Sept. 1–May 31 and now Aug. 10–June 30). In 2024, the mortality cap for adult sows was again reached. Accordingly, the RB300 season was closed by emergency order (No. R2-03-24) effective July 1, 2024 through the remainder of the calendar year, closing the fall season of the hunt.

Table 136-1. Annual occurrences of known human-caused mortalities of brown bears in Game Management Units 7 & 15 in Alaska.

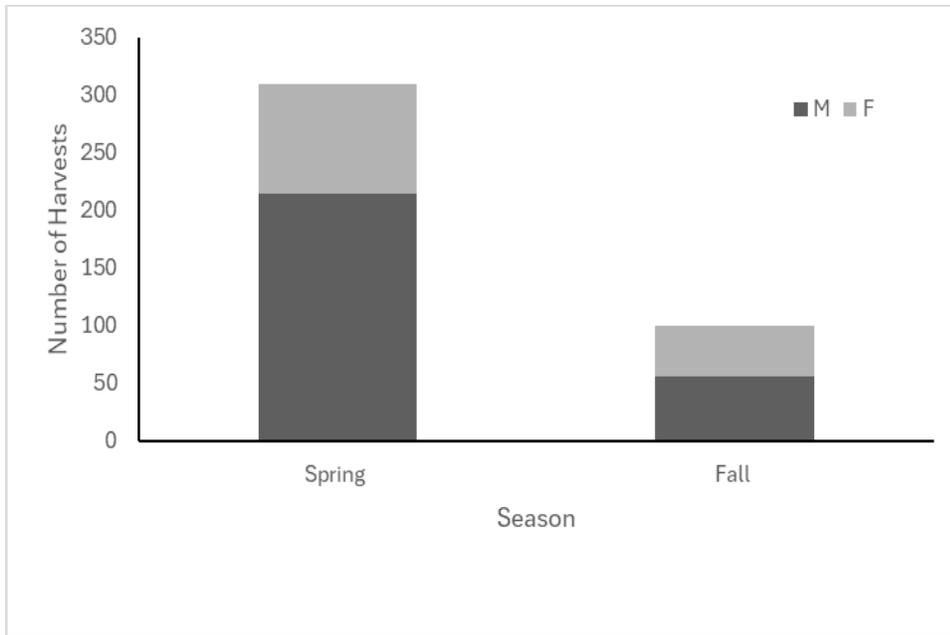
Calendar Year	Hunting Mortality	Non-Hunting Human Caused Mortality	Total
2015	27	4	31
2016	44	13	57
2017	38	9	47
2018	33	13	46
2019	40	8	48
2020	72	11	83
2021	35	5	40
2022	48	9	57
2023	40	7	47
2024	56	9	65
2025	41	1	42

Table 136-2. Annual occurrences of known human-caused mortalities of adult female brown bears in Game Management Units 7 & 15 in Alaska.

Calendar Year	Hunting Mortality	Non-Hunting Human Caused Mortality	Total
2015	8	0	8
2016	3	2	5
2017	3	0	3
2018	5	4	9
2019	5	1	6
2020	14	2	16
2021	4	1	5
2022	12	3	15
2023	7	3	10
2024	12	2	14
2025	8	0	8

Since 2015, an average of 76% of harvest under the RB300 permit occurs during the spring season (Figure 136-1). Reaching mortality caps early in the management year reduces variation available for additional human caused mortalities (e.g., defense of life and property). Managing by regulatory year would help ensure a fall RB300 season while hunters are in the field pursuing other species like moose or caribou. Under the regulatory year strategy, if mortality caps are reached and an EO issued, it is likely to occur in the mid- to late spring season when hunters are specifically targeting bears and when fewer hunting seasons are happening concurrently. Baiting for brown bears is legal in Units 7 and 15, and for regulatory years 2015-2024, of the 565 brown bears sealed, 250 were taken over bait. Of the 565 taken, 76% of the total harvest (365) were taken in the spring.

Figure 136-1. Number of brown bear harvest mortalities by sex occurring during spring and fall in Game Management Units 7 & 15 in Alaska, 2015–2025.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposal because it is allocative and the department can manage under the existing findings proposed findings. Most bear hunting is done in the spring, and changing to a regulatory year allocates more brown bear hunting opportunity to the fall season.

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

PROPOSAL 137 – Remove current human-caused mortality quotas for the RB300 (Units 7 and 15, Kenai Peninsula Brown Bear) permit.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would remove the human-caused mortality quotas for the RB300 permit in Units 7 and 15, as provided in 2015-211 Board of Game findings.

WHAT ARE THE CURRENT REGULATIONS?

**Findings for the Alaska Board of Game
2015-211-BOG
Board Recommendation to the Department of Fish and Game
Provided during the Southcentral Region Meeting
March 18, 2015**

The Board of Game finds as follows, based on information provided by Department staff, Alaska residents and other wildlife users:

The Board recommended the Department take the following management action:

Establish a maximum of human-caused mortality quota of no more than 50-60 brown bears, with no more than 8-12 of these adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(6)		
Unit 7		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30
(14)		
Unit 15		
1 bear every regulatory year by registration permit only	Aug.10—June 30 (General hunt only)	Aug.10—June 30

...

Most of Units 7 and 15 are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and the subsistence priority does not apply. The portion of Unit 15C outside of the NSA has a negative C&T finding for brown bear, and there are no brown bears on Kalgin Island in Unit 15B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would eliminate the RB300 brown bear mortality quota for Units 7 and 15. The department would need to establish new criteria internally for acceptable harvest limits (including sex and age class) and human-caused mortality rates to determine when emergency orders are warranted to modify season dates and provide for sustainable harvest of brown bears.

BACKGROUND: Regulations regarding brown bear hunting in Units 7 and 15 have undergone many changes over the last decade. This has included changes in season dates, method of take, and objectives for allowable human-caused mortality.

The current ranges were established in 2015 by the board. These findings direct the department to establish a maximum human-caused mortality of no more than 50-60 brown bears, with no more than 8-12 of these being adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15. Mortalities are calculated on a 3-year running average.

The department monitors the RB300 hunt closely and uses emergency orders to manage the harvest. In calendar year 2022, the mortality cap of adult sows was reached, prompting an emergency order (No. 02-05-22) closing the fall portion of the season on Sept. 30, 2022 (Tables 137-1 & 137-2). The RB300 season reopened at the start of the new calendar year (January 1, 2023). At the 2023 South Central Board of Game meeting, Proposal 134 was adopted, extending the RB300 season dates by 52 days (previously September 1–May 31 and now August 10–June 30). In 2024, the mortality cap for adult sows was again reached. Accordingly, the RB300 season was closed by emergency order (No. R2-03-24) effective July 1, 2024 through the remainder of the calendar year, closing the fall season of the hunt.

Table 137-1. Annual occurrences of known human-caused mortalities of brown bears in Game Management Units 7 & 15 in Alaska.

Calendar Year	Hunting Mortality	Non-Hunting Human Caused Mortality	Total
2015	27	4	31
2016	44	13	57
2017	38	9	47
2018	33	13	46
2019	40	8	48
2020	72	11	83
2021	35	5	40
2022	48	9	57
2023	40	7	47
2024	56	9	65
2025	41	1	42

Table 137-2. Annual occurrences of known human-caused mortalities of adult female brown bears in Game Management Units 7 & 15 in Alaska.

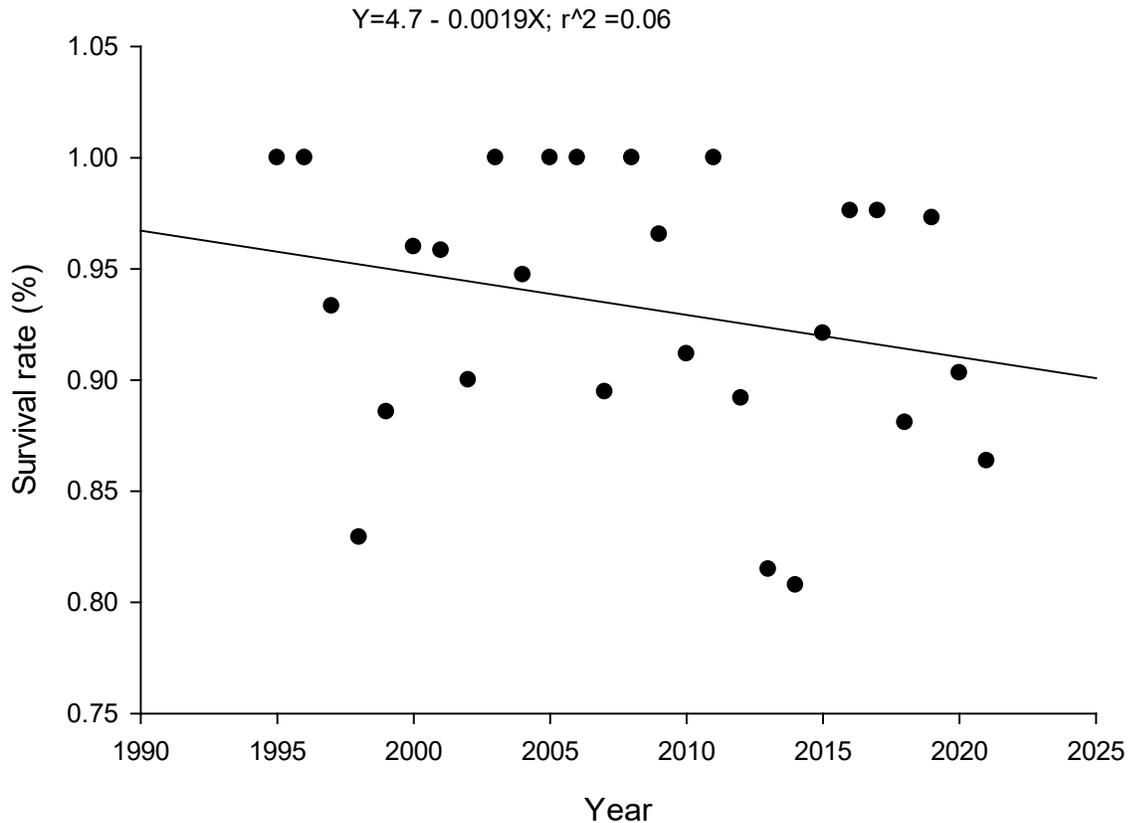
Calendar Year	Hunting Mortality	Non-Hunting Human Caused Mortality	Total
2015	8	0	8
2016	3	2	5
2017	3	0	3
2018	5	4	9
2019	5	1	6
2020	14	2	16
2021	4	1	5
2022	12	3	15
2023	7	3	10
2024	12	2	14
2025	8	0	8

Under the current mortality cap structure, the RB300 management strategy is able maintain a consistent harvest opportunity with only two closures over the last 10 years. Although variable in nature, recorded non-harvest mortalities e.g., DLP) are slightly decreasing.

Adult female survival is the most important parameter affecting population change. Adult female survival is relatively high at 92%, and data indicate a slight reduction in adult female survival since 2015 (Figure 137-1).

Figure 137-1. Annual survival for adult female brown bears in Units 7 & 15, Alaska

Survival rate for adult females



DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal, however new mortality limits would need to be established to provide for sustainable hunting opportunity.

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

PROPOSAL 138 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears. Reduce the RB300 brown bear hunting season in Units 7 and 15 by 15 days.

PROPOSED BY: Ted Spraker

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would shorten the RB300 (Units 7 and 15, Kenai Peninsula Brown Bear) season for both resident and non-resident hunters by 15 days, from August 10 – June 30, to August 10 – June 15.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(6)		
Unit 7		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30
(14)		
Unit 15		
1 bear every regulatory year by registration permit only	Aug.10—June 30 (General hunt only)	Aug.10—June 30
...		

Most of Units 7 and 15 are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and the subsistence priority does not apply. The portion of Unit 15C outside of the NSA has a negative C&T finding for brown bear, and there are no brown bears on Kalgin Island in Unit 15B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would change the RB300 season from August 10—June 30 to August10—June 15. The majority of RB300 harvest occurs in the spring portion of the hunt and shortening the spring season may result in harvest staying below mortality caps, thereby lowering the chance of an emergency order closure.

BACKGROUND: Regulations regarding brown bear hunting in Units 7 and 15 have undergone many changes over the last decade. This has included changes in season dates, method of take, and objectives for allowable human-caused mortality.

The current ranges were established in 2015 by the board. These findings direct the department to establish a maximum human-caused mortality of no more than 50-60 brown bears, with no more than 8-12 of these being adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15. Mortalities are calculated on a 3-year running average.

The department monitors the RB300 hunt closely and uses emergency orders to manage the harvest for long-term sustainability. In calendar year 2022, the mortality cap of adult sows was reached, prompting an emergency order (No. 02-05-22) closing the fall portion of the season on Sept. 30, 2022. The RB300 season reopened at the start of the new calendar year (Jan. 1, 2023). At the 2023 South Central Board of Game meeting, Proposal 134 was adopted, extending the RB300 season dates by 52 days (previously September. 1–May 31 and now August 10–June 30). Harvest over bait is allowed from April 15–June 30. In 2024, the mortality cap for adult sows was again reached. Accordingly, the RB300 season was closed by emergency order (No. R2-03-24) effective July 1, 2024 through the remainder of the calendar year, closing the fall season of the hunt.

The fall season of RB300 represents concurrent harvest opportunity for moose, sheep, and caribou hunters. Annually, the RB300 spring season accounts for 76% of total harvest and 79% of female harvest (Figure 138-1). Shortening the spring portion of the season may result in human-caused mortalities staying below caps, resulting in fewer emergency orders being issued to close the RB300 hunt.

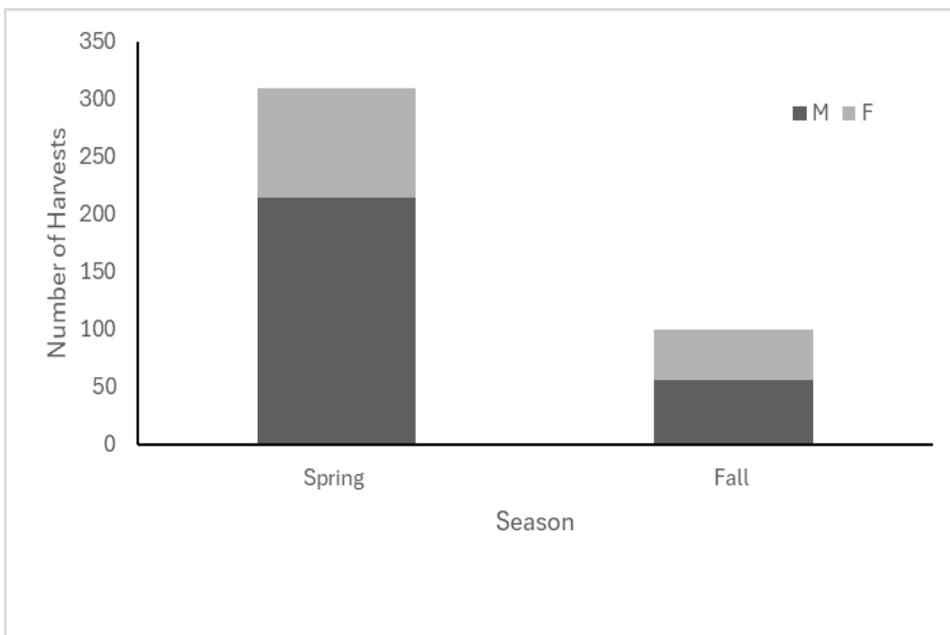


Figure 138-1. Number of brown bear harvest mortalities by sex occurring during spring and fall in Game Management Units 7 & 15 in Alaska, 2015–2025.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative and the department can manage under existing findings or proposed findings. The proposed reduction in season length will likely decrease spring brown bear harvest and adult female harvest based on previous harvest trends. This reduction in spring harvest may keep harvest below the mortality cap longer, reducing the need to close seasons by Emergency Order, resulting in increased fall hunting opportunities.

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

PROPOSAL 139 – Reduce the RB300 brown bear hunting season and, create separate hunts and adult sow mortality caps for Units 7 and 15.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would shorten the RB300 season in Units 7 and 15 from August 10 – June 30 to October 1 – June 15, and create separate hunts and mortality caps for each unit.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(6)		
Unit 7		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30
(14)		
Unit 15		
1 bear every regulatory year by registration permit only	Aug.10—June 30 (General hunt only)	Aug.10—June 30

...

Most of Units 7 and 15 are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and the subsistence priority does not apply. The portion of Unit 15C outside of the NSA has a negative C&T finding for brown bear, and there are no brown bears on Kalgin Island in Unit 15B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would change the RB300 season from August 10—June 30 to October 1—June 15, shortening the season by 67 days. Shortening the season may result in lower harvest and a longer time to reach the established mortality caps, thus fewer emergency orders being issued to close the RB300 hunt.

This proposal also seeks to divide RB300 into two separate hunt areas, one hunt in Unit 7 and one hunt in Unit 15, each with a separate human-caused mortality cap of at least 10 adult sows. This results in increasing the adult sow cap from the current 8-12, to at least 20 adult sows. Increasing the adult sow mortality cap could result in an unsustainably high harvest rate of brown bears in Units 7 & 15.

BACKGROUND: Regulations regarding brown bear hunting in Units 7 and 15 have undergone many changes over the last decade. This has included changes in season dates, method of take, and objectives for allowable human-caused mortality.

The current ranges were established in 2015 by Board of Game findings. These findings direct the department to establish a maximum human-caused mortality of no more than 50-60 brown bears, with no more than 8-12 of these being adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15. Mortalities are calculated on a 3-year running average.

The Department monitors the RB300 hunt closely and uses emergency orders to manage the harvest for long-term sustainability. In calendar year 2022, the mortality cap of adult sows was reached, prompting an emergency order (No. 02-05-22) closing the fall portion of the season on September 30, 2022. The RB300 season reopened at the start of the new calendar year (January 1, 2023). At the 2023 South Central Board of Game meeting, proposal 134 was adopted, extending the RB300 season dates by 52 days (previously September 1—May 31 and now August 10—June 30). Harvest over bait is allowed from April 15—June 30. In 2024, the mortality cap for adult sows was again reached. Accordingly, the RB300 season was closed by emergency order (No. R2-03-24) effective July 1, 2024, through the remainder of the calendar year, closing the fall season of the hunt.

The fall season of RB300 represents opportunity for concurrent harvest opportunity for moose, sheep, and caribou hunters. Annually, the RB300 spring season accounts for 76% of total harvest and 79% of female harvest (Figure 139-1). Shortening the spring portion of the season may result in human-caused mortalities staying below caps, resulting in fewer emergency orders being issued to close the RB300 hunt.

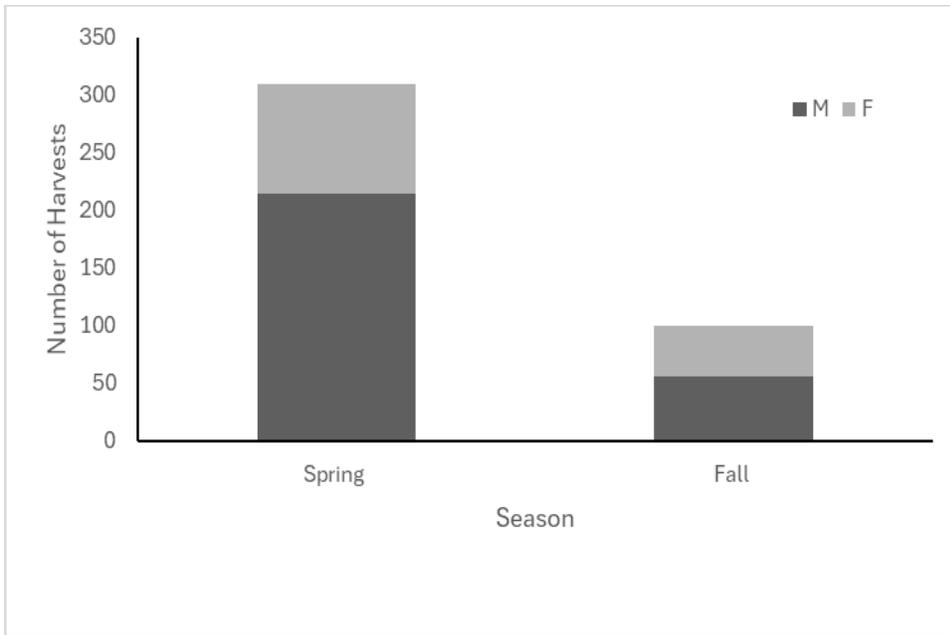


Figure 139-1. Number of brown bear harvest mortalities by sex occurring during spring and fall in Game Management Units 7 & 15 in Alaska, 2015–2025

Under the current mortality cap structure, the RB300 permit has been able to maintain a consistent harvest opportunity with only two closures over the last 10 years. Although variable in nature, recorded non-harvest mortalities (e.g., DLP) are slightly decreasing.

Adult female survival is the most important parameter affecting population change. Adult female survival is relatively high at 92%, and data indicate a slight reduction in adult female survival since 2015 (Figure 139-1).

Survival rate for adult females

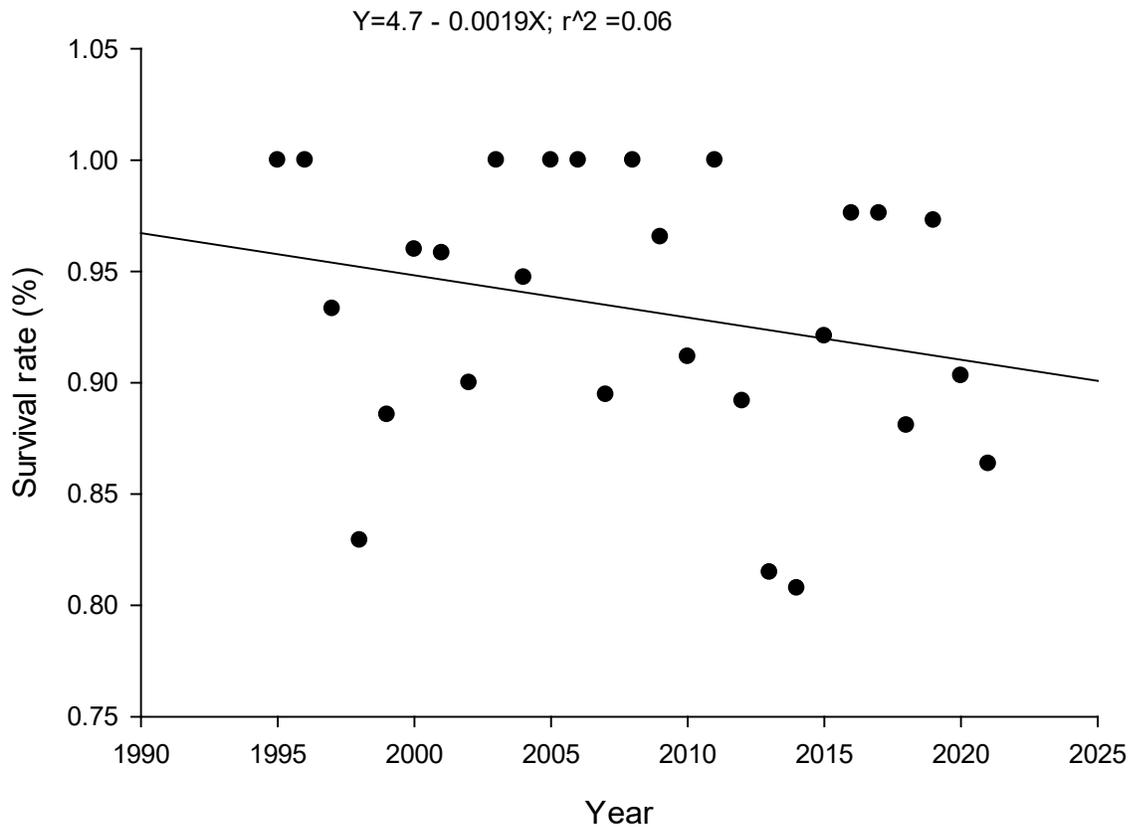


Figure 139-1. Annual survival for adult female brown bears in Units 7 & 15, Alaska.

There is a lack of evidence to support delineating Units 7 and 15 as separate or subpopulations. In addition to the large geographic ranges and movements of radio-marked brown bears, genetic analysis shows no evidence of population substructuring. The department recommends consistent seasons, bag limits, and mortality caps, among units 7 and 15.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on reducing season length, because it is allocative, and can manage under existing findings or proposed findings. Adoption of the proposal will likely decrease spring brown bear harvest and adult female harvest based on previous harvest trends. Reducing harvest will likely result in remaining below the mortality caps, reducing the need to close the hunt by Emergency Order, resulting in increased fall hunting opportunity.

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

PROPOSAL 140 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears. Restrict hunters who harvest a female brown bear in Units 7 and 15 from hunting RB300 for two to four years.

PROPOSED BY: Garrett Becker

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would restrict hunters who harvest a female (sow) brown bear under the RB300 (Units 7 and 15, Kenai Peninsula Brown Bear) permit from obtaining another RB300 permit for two to four years.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(6)		
Unit 7		
1 bear every regulatory year by registration permit only	Aug. 10—June 30 (General hunt only)	Aug. 10—June 30
(14)		
Unit 15		
1 bear every regulatory year by registration permit only	Aug.10—June 30 (General hunt only)	Aug.10—June 30
...		

Most of Units 7 and 15 are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and the subsistence priority does not apply. The portion of Unit 15C outside of the NSA has a negative C&T finding for brown bear, and there are no brown bears on Kalgin Island in Unit 15B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would prohibit hunters who harvest a female (sow) brown bear in Units 7 and 15 from obtaining an RB300 permit for the next two to four years (proposal provides options).

Hunters may be more selective prior to harvesting a bear, similar to the intentions of the nanny penalty for mountain goats. Hunters could participate in brown bear hunting elsewhere in the state during this time. There are currently no other brown bear hunts with this restriction.

BACKGROUND: The department monitors the RB300 hunt closely and uses human-caused mortality caps and emergency orders to manage the harvest. This allows the closure of the season if conservation concerns arise or mortality caps are met to ensure the long-term sustainability of the brown bear population.

The current mortality caps were established in 2015 by the board. These findings direct the department to establish a maximum of human-caused mortality quota of no more than 50-60 brown bears, with no more than 8-12 of these adult (at least 5 years old) sows, per calendar year beginning after January 1, 2015, for Units 7 and 15. These caps are calculated on a 3-year running average. Since these caps were established the RB300 season has been closed by emergency order twice, in 2022 and 2024, both times due to reaching the adult sow mortality caps.

An average of 1,107 RB300 permits are issued each regulatory year, (range: 650-1748), with 98% and 2% of permit holders being residents and nonresidents, respectively.. For both residents and nonresidents, a brown bear locking tag is required.

Since 2012, there have been 618 successful RB300 hunters. Twenty nine hunters (6%) harvested at least one sow. This proposal would reduce harvest by approximately 2 total bears; 0-1 of which would be sows. Sows accompanied by cubs are not legal for harvest under current regulations, and all brown bears taken in these units must be sealed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it allocates harvest to hunters over time (years). Reduction in female harvest will ensure continued sustainable harvest opportunity and likely reduce the need to use EOs to manage the harvest. There would be no change to established mortality caps from this proposal. The effect on overall harvest or effort would be minimal.

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

PROPOSAL 141 – 5 AAC 84.270(5). Furbearer trapping. Establish consistent dates for lynx trapping in Units 7 and 15, when the season is open.

PROPOSED BY: Douglas Malone

WHAT WOULD THE PROPOSAL DO? This proposal would set the lynx trapping season dates in Units 7 and 15 to December 15 through the last day of February, and remove the department’s ability to change trapping dates by emergency order.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 84.270

(5) Lynx

Species and Units	Open Season	Bag Limit
Units 7, 11, and 13 – 16	Nov. 10 – Last day of Feb.	No limit; season may be closed by emergency order.

...

In the portion of Unit 15C that is outside of the Anchorage-MatSu-Kenai nonsubsistence area, the board has made a positive customary and traditional use finding for lynx. The board has determined an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would shorten the current trapping season set for lynx in regulation by more than 30 days and would remove the department’s authority to shorten the season length by emergency order; the season is currently managed through annual announcements. Managers would retain the ability to close the season by emergency order during times of low abundance. The effect would be a set season when open, and seasons would continue to be closed in their entirety in periods of low abundance.

BACKGROUND: In spring 1992, the board adopted a lynx harvest tracking strategy in Southcentral Game Management Units with framework trapping seasons of November 10 through the last day of February. The board delegated authority to the department to adjust season dates within this framework to track population cycles.

Since 1992 the department has used its authority to set season length and open/closure status. The first season held after adoption of the lynx tracking cycle framework was January 1–31, 1996 in Units 7, 15(B), and 15(A). The following year, in 1997, two additional weeks were added to the season (Jan. 1– Feb. 15) and all portions of Units 7 and 15 were open. Since 1997, when open, the season dates have varied between Jan. 1–31 and Jan. 1 – Feb. 15 with all units open.

Since the harvest tracking strategy was implemented, there have been two major peaks in harvest, in 1998 and 2011, with harvest of 151 and 465 lynx, respectively. Two to three years

after each peak in harvest, there was a 6- to 7-year trapping-season closure, (Figure 141-1). Traps and snares account for the majority of harvest, (88%), followed by shooting (11%). Harvest per trapper in each season typically ranges from 2 to 5 lynx and strongly correlates with the lynx population abundance cycle (Table 141-1).

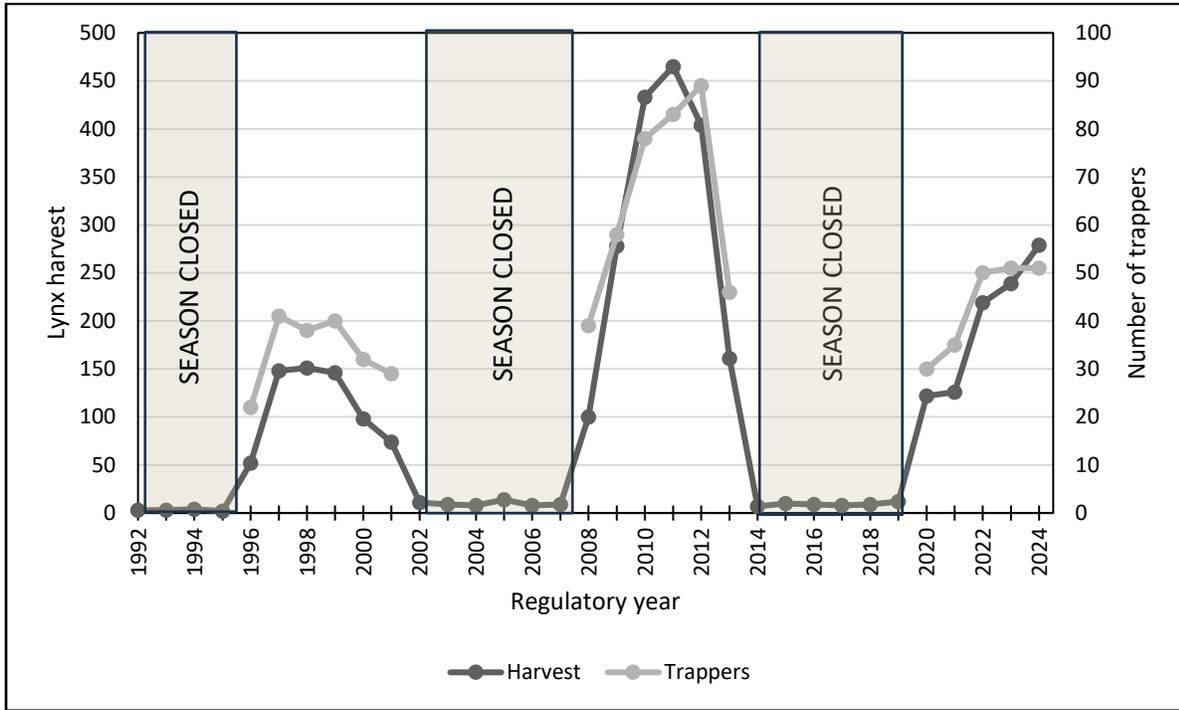


Figure 141-1. Total lynx harvest and number of successful trappers, regulatory years 1992–2024, Units 7 and 15, Kenai Peninsula, Alaska.

Regulatory year	Number of Trappers	Harvest	Harvest per trapper
1996	22	47	2.1
1997	41	129	3.1
1998	38	143	3.8
1999	40	105	2.6
2000	32	82	2.6
2001	29	51	1.8
2008	39	94	2.4
2009	58	247	4.3
2010	78	419	5.4
2011	83	444	5.3
2012	89	345	3.9
2013	46	101	2.2
2020	30	114	3.8
2021	35	116	3.3
2022	50	214	4.3
2023	51	234	4.6
2024	51	258	5.1

Table 141-1. Lynx harvest per successful trapper, regulatory years 1996–2024, Units 7 and 15, Kenai Peninsula, Alaska.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Lynx harvest may increase during years when the trapping season is open. The board does not have the authority to restrict the department’s ability to close seasons during low abundance years, so the proposal presents no biological concern. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 142 – 5 AAC 84.270(5) and 5 AAC 85.060(a)(4) Trapping and hunting seasons for lynx in Units 7 and 15. Establish consistent dates for lynx trapping in Units 7 and 15, when the season is open.

PROPOSED BY: Tom Nelson

WHAT WOULD THE PROPOSAL DO? This proposal would change the lynx hunting and trapping season dates in Units 7 and 15 to Dec. 15–Feb. 15.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 84.270

(5) Lynx

Species and Units	Open Season	Bag Limit
Units 7, 11, and 13 – 16	Nov. 10 – Last day of Feb.	No limit; season may be closed by emergency order.

5 AAC 85.060

(4) Lynx

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units 6,7, 11, and 13 – 16 2 lynx	Nov. 10 –Feb. 28 (General hunt only)	Nov. 10 –Feb. 28

...

In the portion of Unit 15C that is outside of the Anchorage-MatSu-Kenai nonsubsistence area, the board has made a positive customary and traditional use finding for lynx. The board has determined an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would shorten the current lynx hunting and trapping season dates from November 10 to the last day of February or February 28 to December 15– February 15. Currently, specific annual season dates are announced by emergency order. The effect would be a set season when open, and seasons would continue to be closed in their entirety in periods of low abundance.

BACKGROUND: In spring 1992, the board adopted a lynx harvest tracking strategy in Southcentral Game Management Units with a trapping season framework of November 10 through the last day of February. The board delegated authority to the department to adjust season dates within this framework to track population cycles.

Since 1992 the department has used its authority to set season length and open/closure status. The first season held after adoption of the lynx tracking cycle was January 1–31, 1996 in Units 7, 15(B), and 15(A). The following year, in 1997, two additional weeks were added to the season (Jan. 1 – Feb. 15.) and all portions of Units 7 and 15 were open. Since 1997, when open, the season dates have varied between Jan. 1–31 and Jan. 1 – Feb. 15 with all units open.

Since the harvest tracking strategy was implemented, there have been two major peaks in harvest, 1998 and 2011, with harvest of 151 and 465 lynx, respectively. Two to three years after each peak in harvest, there was a 6- to 7-year trapping season closure (Figure 141-1). Traps and snares account for the majority of harvest (88%), followed by shooting (11%). Harvest per trapper in each season typically ranges from 2 to 5 lynx and strongly correlates with the lynx population abundance cycle (Table 141-1).

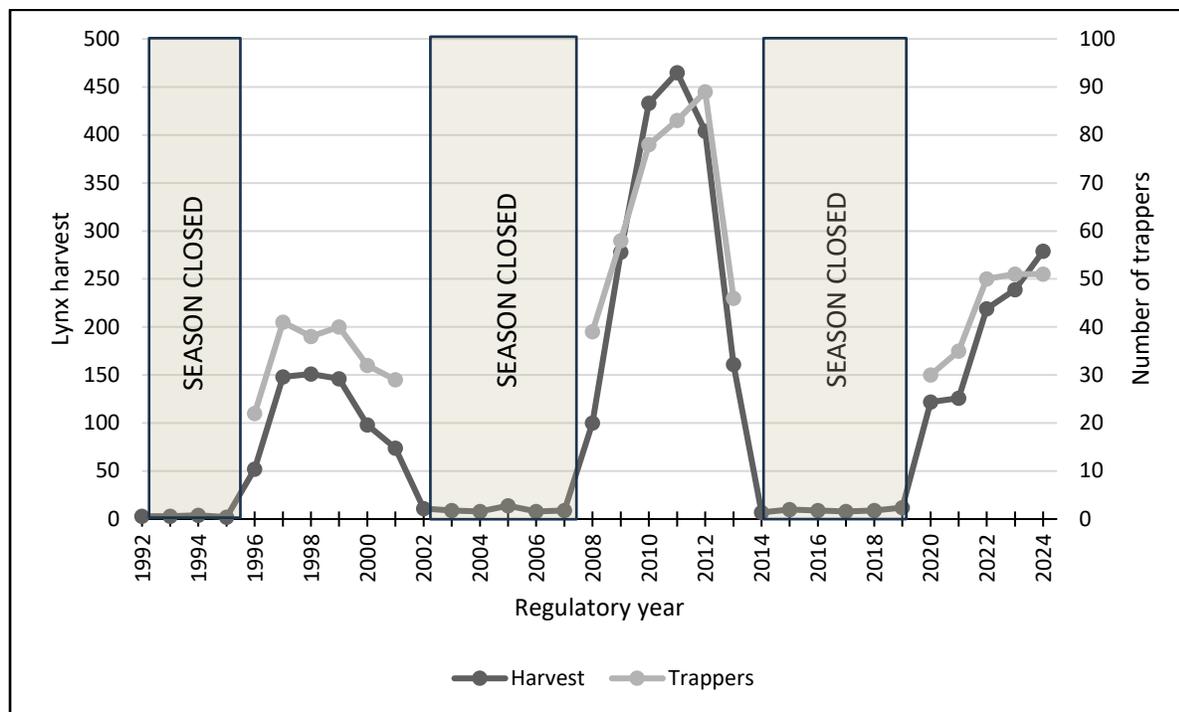


Figure 142-1. Total lynx harvest and number of successful trappers, regulatory years 1992–2024, Units 7 and 15, Kenai Peninsula, Alaska.

Regulatory Year	Number of Trappers	Harvest	Harvest per Trapper
1996	22	47	2.1
1997	41	129	3.1
1998	38	143	3.8
1999	40	105	2.6
2000	32	82	2.6
2001	29	51	1.8
2008	39	94	2.4
2009	58	247	4.3
2010	78	419	5.4
2011	83	444	5.3
2012	89	345	3.9
2013	46	101	2.2
2020	30	114	3.8
2021	35	116	3.3
2022	50	214	4.3
2023	51	234	4.6
2024	51	258	5.1

Table 142-1. Lynx harvest per successful trapper, regulatory years 1996–2024, Units 7 and 15, Kenai Peninsula, Alaska.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Lynx harvest may increase during years in which trapping season is open. The board does not have the authority to restrict the department’s ability to close seasons during low abundance years, so the proposal presents no biological concern. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 143 – 5 AAC 84.270(5). **Furbearer trapping.** Lengthen the trapping season for lynx in Units 7 and 15.

PROPOSED BY: John and Debbie Dahman

WHAT WOULD THE PROPOSAL DO? This proposal would change the lynx trapping season dates in Units 7 and 15 to December 1 – February 15.

WHAT ARE THE CURRENT REGULATIONS?

(5) Lynx

Species and Units	Open Season	Bag Limit
Units 7, 11, and 13 – 16	Nov. 10 – Last day of Feb.	No limit; season may be closed by emergency order.

...

In the portion of Unit 15C that is outside of the Anchorage-MatSu-Kenai nonsubsistence area, the board has made a positive customary and traditional use finding for lynx. The board has determined an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted as written, this proposal would shorten the current regulation lynx season dates from November 10 to the last day of February to December 1 – February 15. The specific annual season length is currently announced by emergency order.

BACKGROUND: In spring 1992, the board adopted a lynx harvest tracking strategy in Southcentral Game Management Units with framework trapping seasons of November 10 through the last day of February. The board delegated authority to the department to adjust season dates within this framework to track population cycles.

Since 1992 the department has used its authority to set season length and open/closure status. The first season held after adoption of the lynx tracking cycle was January 1–31, 1996 in Units 7, 15(B), and 15(A). The following year, in 1997, two additional weeks were added to the season (Jan. 1 – Feb. 15.) and all portions of Units 7 and 15 were open. Since 1997, when open, the season dates have varied between Jan. 1– Jan. 31 and Jan. 1 – Feb. 15 with all units open.

Since the harvest tracking strategy was implemented, there have been two major peaks in harvest, 1998 and 2011, with harvest of 151 and 465 lynx, respectively. Two to three years after each peak in harvest there has been a 6- to 7-year trapping-season closure, (Figure 143-1). Traps and snares account for the majority of harvest, (88%), followed by shooting (11%). Harvest per trapper typically ranges from 2 to 5 lynx each season and strongly correlates with the lynx population abundance cycle (Table 143-1).

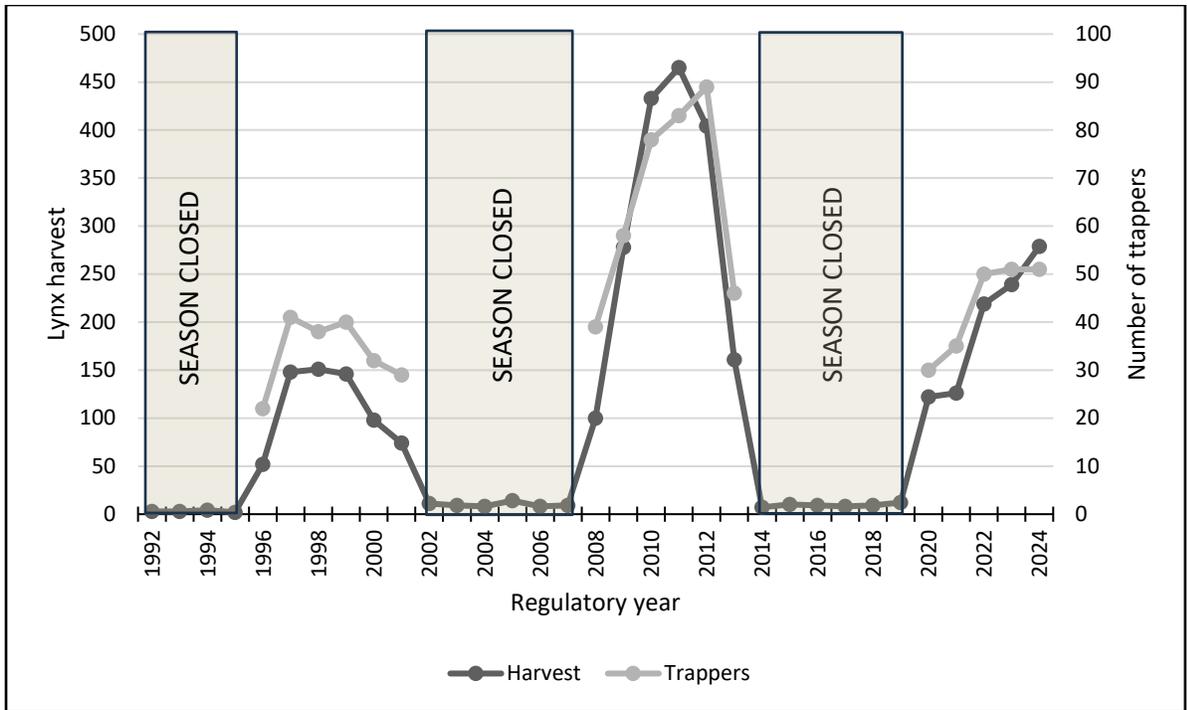


Figure 143-1. Total lynx harvest and number of successful trappers, regulatory years 1992–2024, Units 7 and 15, Kenai Peninsula, Alaska.

RY	Number of Trappers	Harvest	Harvest per Trapper
1996	22	47	2.1
1997	41	129	3.1
1998	38	143	3.8
1999	40	105	2.6
2000	32	82	2.6
2001	29	51	1.8
2008	39	94	2.4
2009	58	247	4.3
2010	78	419	5.4
2011	83	444	5.3
2012	89	345	3.9
2013	46	101	2.2
2020	30	114	3.8
2021	35	116	3.3
2022	50	214	4.3
2023	51	234	4.6
2024	51	258	5.1

Table 143-1. Lynx harvest per successful trapper, regulatory years 1996–2024, Units 7 and 15, Kenai Peninsula, Alaska.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Lynx harvest may increase during years in which trapping season is open. The board does not have the authority to restrict the department’s ability to close seasons during low abundance years, so the proposal presents no biological concern. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 144 – 5 AAC 84.270 and 5 AAC 85.060. Lengthen the trapping season for lynx in Units 7 and 15 to align with Units 6 and 14C.

PROPOSED BY: Brian Watkins

WHAT WOULD THE PROPOSAL DO? This proposal would set the lynx hunting and trapping season dates in Units 7 and 15 to November 10 – February 28.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 84.270. Furbearer trapping. Trapping seasons and bag limits for furbearers are as follows:

(5) Lynx

Species and Units	Open Season	Bag Limit
Units 7, 11, and 13 – 16	Nov. 10– Last day of Feb.	No limit; season may be closed by emergency order.

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

(4) Lynx

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units 6,7, 11, and 13 – 16 2 lynx	Nov. 10–Feb. 28 (General hunt only)	Nov. 10–Feb. 28

...

In the portion of Unit 15C that is outside of the Anchorage-MatSu-Kenai nonsubsistence area, the board has made a positive customary and traditional use finding for lynx. The board has determined an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would have no effect on current season length in regulation, it would remove the department's authority to shorten the season length by emergency order as the season is currently managed through annual announcements. Managers would retain the ability to close the season by emergency order during times of low abundance.

BACKGROUND: In spring 1992, the board adopted a lynx harvest tracking strategy in Southcentral game management units with framework trapping seasons of November 10 through the last day of February. The board delegated authority to the department to adjust season dates within this framework to track population cycles.

Since 1992 the Department has used its authority to set season length and open/closure status. The first season held after adoption of the lynx tracking cycle was in 1996 from Jan. 1 – Jan. 31 in Units 7, 15(B), and 15(A) The following year in 1997, two additional weeks were added to the season (Jan. 1 – Feb. 15.) and all portions of Units 7 and 15 were open. Since 1997, when open, the season dates have varied between Jan. 1– Jan. 31 and Jan. 1 – Feb. 15 with all units open.

Since the harvest tracking strategy was implemented, there have been two major peaks in harvest, 1998 and 2011 with harvest of 151 and 465 lynx respectively. Typically, 2-3 years after these peaks has been a 6–7 year trapping season closure, (Figure 143-1). Traps and snares account for the majority of harvest, (88%), followed by shooting (11%). Harvest per trapper in a given season typically ranges from 2-5 lynx, and strongly correlates with the lynx population abundance cycle (Table 144-1).

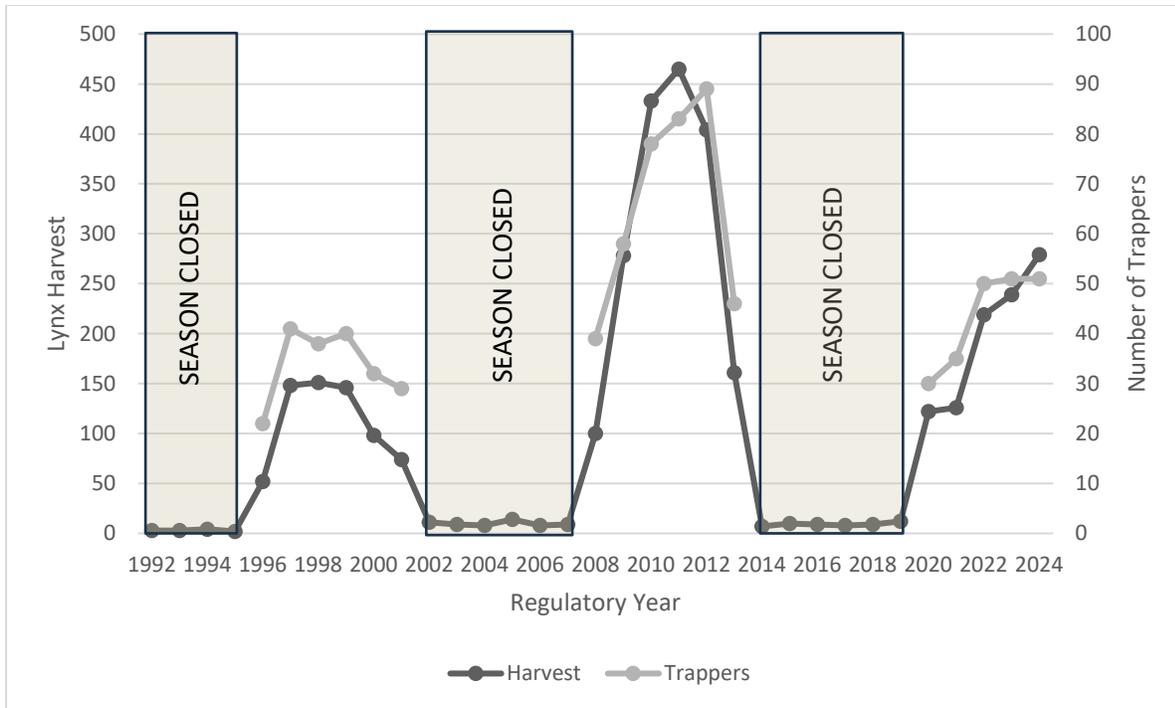


Figure 141-1. Total lynx harvest and number of successful trappers, 1992-2024, in Units 7 & 15, Alaska

RY	# Trappers	Harvest	Harvest/Trapper
1996	22	47	2.1
1997	41	129	3.1
1998	38	143	3.8
1999	40	105	2.6
2000	32	82	2.6
2001	29	51	1.8
2008	39	94	2.4
2009	58	247	4.3
2010	78	419	5.4
2011	83	444	5.3
2012	89	345	3.9
2013	46	101	2.2
2020	30	114	3.8
2021	35	116	3.3
2022	50	214	4.3
2023	51	234	4.6
2024	51	258	5.1

Table 141-1. Lynx harvest per successful trapper, 1996-2024, in Units 7 & 15, Alaska

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Lynx harvest may increase during years in which trapping season is open. The board does not have the authority to restrict the department’s ability to close seasons during low abundance years, so the proposal presents no biological concern. If the board adopts the proposal, the department recommends the date be changed to the last day of February to allow for opportunity on February 29th during leap years. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 154– 5 AAC 85.065(a)(4). Hunting seasons and bag limits for small game.

Rescind the special bag limit restrictions for sea ducks in Units 7 and 15.

PROPOSED BY: Ethan Waldvogel

WHAT WOULD THE PROPOSAL DO? The proposal would align the sea duck bag and possession limits for 15C with those in remainder units in the Gulf Coast Hunt Zone for resident and nonresident hunters by rescinding the special bag limit restrictions for long-tailed ducks, harlequin ducks, and eiders (king and common). The proposal also requests removing the resident and nonresident 1 per day, 2 in possession restriction on long-tailed ducks in Units 7 and 15.

WHAT ARE THE CURRENT REGULATIONS? The regulations for remainder units (Units 5, 6, 9, 10 (Unimak Island only), 14, and 16) in the Gulf Coast Hunt Zone are as follows: residents are allowed 10 per day, 20 in possession of sea ducks, of which no more than 6 per day, 12 in possession may be harlequin ducks or long-tailed ducks; and nonresidents are allowed 8 per day, 20 in possession but no more than 4 each of any sea duck species per season, and no more than 20 sea ducks of all species may be taken per season.

The following are the regulations for bag limits of sea ducks in Units 7 and 15:

5 AAC 85.065(a)(4) Migratory game birds (except falconry)

(B) Sea Ducks

Units and Bag Limits	Resident Open Season Subsistence and General Hunts)	Nonresident Open Season
Unit 7 and remainder of 15		
RESIDENT HUNTERS:		
10 per day, 20 in possession, of which no more than 6 per day, 12 in possession, may be harlequin ducks and no more than 1 per day, 2 in possession, may be long-tailed ducks	Sept. 1 – Dec. 16 (General hunt only)	
NONRESIDENT HUNTERS:		
8 per day, 20 in possession; and no more than 1 per day, 2 in possession, may be long-tailed ducks; however, no more than 4 each of any sea duck species may be taken per season; and no more than 20 sea ducks of all species may be taken per season		Sept. 1 – Dec. 16
Unit 15(C), that portion in Kachemak Bay east of a line from Point Pogibshi to Anchor Point		
RESIDENT HUNTERS:		
10 per day, 20 in possession, of which no more than 2 per day, 4 in possession, may be harlequin ducks, no more than 1 per day, 2 in possession may be long-tailed ducks, and no more than	Sept. 1 – Dec. 16 (General hunt only)	

1 per day, 2 in possession may be an eider

NONRESIDENT HUNTERS:

8 per day, 20 in possession, of which no more than 2 per day, 4 in possession, may be harlequin ducks, no more than 1 per day, 2 in possession, may be long-tailed ducks, and no more than 1 per day, 2 in possession, may be an eider; however, no more than 4 each of any sea duck species may be taken per season; and no more than 20 sea ducks of all species may be taken per season

Sept. 1 – Dec. 16

The Alaska Board of Game (board) made a positive customary and traditional use finding for migratory game birds in all units with a harvestable surplus, including the portion of 15C outside of the Anchorage-Matsu-Kenai Nonsubsistence Area (NSA). The board has not determined an amount reasonably necessary for subsistence. Other portions of Unit 15, and all of Unit 7, are located within the Anchorage-Matsu-Kenai NSA, therefore there are no subsistence uses for migratory game birds in these areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposed regulation would provide additional opportunity for sea duck hunters in Units 7 and 15 (including 15C), resulting from liberalized daily bag and possession limits for harlequin ducks, long-tailed ducks, and eiders. Resident hunters would legally be permitted to harvest no more than 6 per day and have 12 in possession of harlequin ducks and long-tailed ducks, and no more than 10 per day, 20 in possession of king and common eiders. Nonresident hunters would be legally permitted to harvest 8 per day but no more than 4 each of any sea duck species per season and no more than 20 sea ducks of all species per season.

BACKGROUND: In 1999, the board adopted moderate restrictions to sea duck bag and possession limits in response to general concerns over large-scale and long-term declining trends in some species of sea ducks in Alaska. The limits were reduced for residents from 15 per day, 30 in possession to 10 per day, 20 in possession; and restricted nonresidents to no more than 4 each of scoters, eiders, harlequin and long-tailed ducks per season and a per season total possession limit of 20. In addition, limits for harlequin ducks and long-tailed ducks were reduced by considering them under the general duck limit. In 2001, the board further clarified these regulations for residents and nonresidents but included a restriction that limited residents to no

more than 6 per day, 12 in possession for harlequin ducks or long-tailed ducks. The department noted these modifications were appropriate and represented a practical balance of precaution over resource concerns and retention of sea duck harvest opportunity in Alaska, including the needs of subsistence users.

In subsequent board cycles, the public expressed concerns over perceived localized depletions of sea ducks in Kachemak Bay. In response, in 2010 the board further reduced the resident/nonresident limits in Unit 15C for harlequin ducks and long-tailed ducks to no more than 2 per day, 4 in possession and for eiders to no more than 1 per day, 2 in possession. In 2023, the board further reduced resident/nonresident limits of long-tailed ducks to no more than 1 per day, 2 in possession in Units 7 and 15.

The biology and distribution of sea ducks complicate efforts to assess their status and trends; currently, there are only a few surveys that are well-suited or specific to monitoring sea ducks. However, continental-scale (Waterfowl Breeding Population and Habitat Survey [BPOP]) or regional breeding pair surveys (Yukon-Kuskokwim Delta and Arctic Coastal Plain) provide some information on sea duck populations in Alaska. Long-term annual indices from these surveys have shown population declines in many species between the 1970s and mid-1990s; for example, eiders, scoters, and long-tailed ducks seemingly experienced declines of more than 50%. Reasons for these declines are unknown. Since the 1990s, many sea duck population trends have either stabilized or are increasing, although abundances remain below historical population levels. Data from regional surveys indicated long-term trends for king and common eiders increased at average annual rates of 2.5% and $\geq 4\%$, respectively. In contrast, long-term (1964–2024) trend data from the Alaska strata of the BPOP indicates long-tailed ducks declined at an average annual rate of 2.69%. There is no statewide survey data available for harlequin ducks.

Because of continued public interest in the waterfowl resources in Unit 15C, the department conducted periodic aerial and boat-based surveys of wintering waterfowl in Kachemak Bay in 1999-2003, 2012-2014, and 2018-2019. Initially, the objective of the surveys was to obtain estimates of abundance and trends for waterfowl species wintering in Kachemak Bay. However, the survey design did not account for imperfect detection and double counting of birds. Thus, data were analyzed as trends in abundance indices over the duration of the survey as opposed to true abundance. Results indicated an annual increase of 1.2% in the abundance index for harlequin ducks and an annual decrease of 0.37% for long-tailed ducks. Survey observations of king and common eiders were numerically insufficient to reliably calculate trends in abundance indices.

The annual harvest of sea ducks during the fall-winter period in Alaska is estimated by the U.S. Fish & Wildlife Service's national harvest survey, which itself is informed by the Harvest Information Program (HIP). Hunters in Alaska register for HIP with the purchase of a state duck stamp. The national harvest survey is designed to provide species-specific harvest estimates at nationwide and statewide scales. The long-term (1999-2024) average annual statewide harvest

estimate for long-tailed ducks was 809 and the latest 3-year (2022-2024) average annual statewide harvest estimate was 1,706. For harlequin ducks the long-term average annual harvest estimate was 1,658 and the recent 3-year average was 1,113. Harvest estimates for eiders are grouped across species (king and common) and the long-term annual average was 259 and the 3-year average was 157.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal. However, the department notes that sea duck management is directed primarily at the statewide level with consideration for regional scale management if feasible. The department has no practical or reliable means of monitoring population trends or harvest at small geographic scales (e.g., unit or subunit) that might direct localized regulatory decisions, including limited population data from the units covered by this proposal.

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

PROPOSAL 233 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Change the boundary for Unit 8 brown bear hunts DB106/206/136/236.

PROPOSED BY: Aaron Bloomquist

WHAT WOULD THE PROPOSAL DO? This proposal seeks to change the Unit 8 brown bear hunt boundary for brown bear drawing hunts DB106/206/136/236.

WHAT ARE THE CURRENT REGULATIONS?

...		
Remainder of Unit 8	Apr. 1–May 15 (General hunt only) Oct. 25–Nov. 30 (General hunt only)	Apr. 1–May 15 Oct. 25–Nov. 30

1 bear every 4 regulatory years
by permit only, as provided in
5 AAC 92.061

...

There is a negative customary and traditional use finding for brown bear in Unit 8.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would move the northeast boundary of hunt unit 06 from the valley of Avnulu Creek to the adjacent northeast ridgeline and follow the ridgeline southeast down to Cape Kasiak (Figure 233-1). This change would slightly reduce the size of adjacent hunt unit 05 and slightly expand hunt area 06. This boundary change would occur entirely on federal lands but would result in state delineated hunt boundaries that no longer align with the delineation of federal guide use areas 05 and 06. Currently, hunt area 06 is classified as an exclusive guide use area which provides exclusive guiding privileges on federal land. There is currently one guide registered to hunt in area 06. Hunt area 05 is considered a partially exclusive guide use area with guides having exclusive guiding privileges on federal lands within the hunt area but not on private lands (e.g., Sitkalidak Island). However, there is one guide currently registered to hunt in area 05 that has obtained exclusive permission to guide private lands within hunt area 05 resulting in exclusive guiding privileges on both private and federal lands within hunt area 05. This proposal would likely not require ADF&G to adjust the number of permits for either area due to the limited area impacted by this change.

BACKGROUND: Kodiak Island is divided into 31 Kodiak brown bear drawing hunt areas open to both resident and nonresident hunters through an application and lottery process. Nonresident hunters who are citizens of the United States are required to be personally accompanied in the field by an Alaska-licensed guide or be accompanied by a relative within second degree of kindred that is 19 years of age or older when hunting Kodiak brown bears. Nonresident aliens (not residents of the United States) are also required to be personally accompanied by an Alaska-licensed guide. Alaska-licensed guides can register to take clients in a maximum of 3 guide use areas throughout the state. Of the 31 brown bear hunt areas throughout Kodiak Island, 21 are classified partially or entirely as Exclusive Guide Use Areas. Exclusive Guide Use Areas are areas in which a single guide is granted sole access to guide hunts on federal lands within these areas. Guides for these exclusive guide use areas are selected through a highly competitive application and proposal ranking process through the U.S. Fish and Wildlife Service. Guides are granted exclusive guiding privileges for these areas for 5 years (with an option to extend before the proposal process is reinstated and guides can once again compete for exclusive access to these areas.

Hunt area 05 (Three Saints and Barling Bay) is made up of both private and federal lands. The currently authorized guide can use both federal and private lands. There are 8 brown bear permits (5 resident, 3 nonresident) available in the spring and 7 brown bear permits (4 resident, 3 nonresident) available in the fall for hunt area 05. Hunt area 06 (Kaiugnak Bay) has one guide registered in the area and has 8 brown bear permits (5 resident, 3 nonresident) available in the spring and 5 brown bear permits (3 resident, 2 nonresident) available in the fall. Over the past 5 years (RY20–RY24), on average 2 bears have been harvested by residents per year and 4.8 bears have been harvested by nonresidents per year in hunt area 06 (Kaiugnak Bay); and on average

3.4 bears have been harvested by residents per year and 5 bears have been harvested by nonresidents per year in hunt area 05 (Three Saints and Barling Bay).

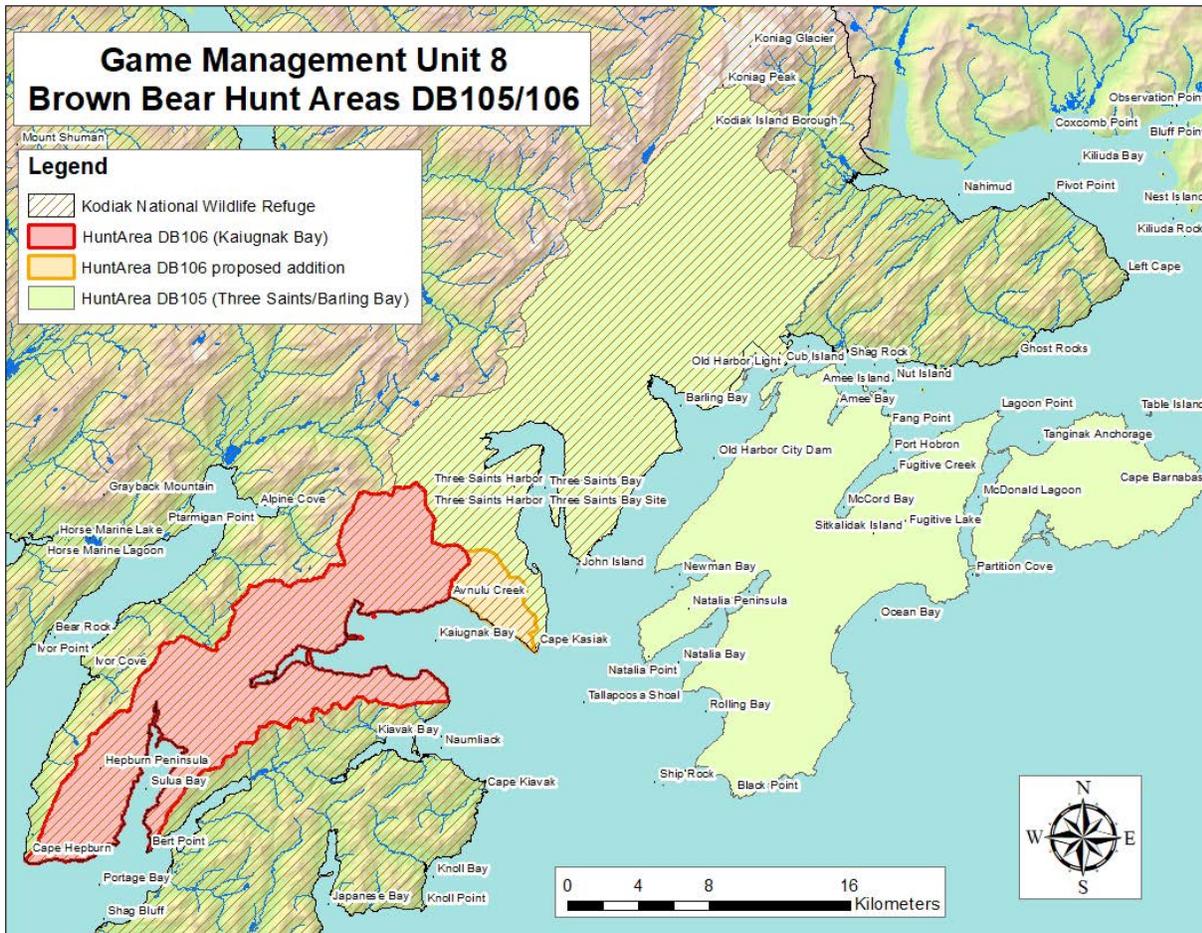


Figure 233-1. Proposed boundary changes to Kodiak brown bear hunt areas 05 and 06 for Alaska Board of Game meeting, March 2026.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to change the boundaries for hunt areas 05 and 06. If adopted this proposal will not create a biological concern but will misalign existing guide use and hunt areas. Since submission, the proponent has expressed a desire to withdraw this proposal.

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

PROPOSAL 234 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Shorten the spring brown bear season in Unit 8 to open April 20.

PROPOSED BY: Stig Yngve

WHAT WOULD THE PROPOSAL DO? This proposal seeks to shorten the spring brown bear season in Unit 8 by opening the hunt on April 20 instead of April 1.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(7)		
Unit 8, that portion of Kodiak Island and adjacent Islands, including all drainages into Chiniak, Anton Larsen, and northeast Ugak (east of Saltery Creek drainage) Bays	Oct. 25–Nov. 30 (General hunt only)	Oct. 25– Nov. 30 Apr. 1–May 15
	Apr. 1–May 15 (General hunt only)	
1 bear every 4 regulatory years by registration permit only		
Remainder of Unit 8	Apr. 1–May 15 (General hunt only) Oct. 25–Nov. 30 (General hunt only)	Apr. 1–May 15 Oct. 25–Nov. 30
1 bear every 4 regulatory years by permit only, as provided in 5 AAC 92.061		

...

There is a negative customary and traditional use finding for brown bear in Unit 8.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would shorten the spring bear hunting season by 19 days and may result in a slight reduction in spring hunting opportunity and harvest of brown bears. Due to den emergence patterns, male brown bears are more commonly available for harvest during early portions of the spring bear season. Male brown bears are typically the first bears to emerge from dens in the spring providing early season hunting opportunities for hunters. Lone females followed by females with dependent young emerge later. Females with newborn cubs are commonly the last reproductive class to emerge from dens in the spring. Brown bear cubs and sows accompanied by cubs may not be harvested. Adjusting the opening date and reducing the season by 19 days may result in some hunters hunting later in the season when more female bears are present on the landscape, potentially resulting in a higher likelihood of female harvest. Additionally, reducing the spring bear season by 19 days may result in increased hunter conflict and a reduction in “hunt experience” as more hunters would be on the landscape during the reduced season dates. This proposal would also result in lost hunting opportunity for spring hunters only available to hunt during the early portion of the season; however historically very few bears are harvested in early April.

BACKGROUND: Kodiak bear hunts are considered one of the premier hunts in the world and are one of Kodiak’s foremost trophy hunts. The Kodiak bear population has been managed to promote a healthy, stable population that produces trophy-quality males while providing sustained hunting opportunities. One of the primary objectives of Kodiak’s bear management strategy is to limit human-caused mortality of female bears while maintaining a population that will sustain an annual harvest comprised of at least 60% males. The Kodiak brown bear season is split into 2 seasons; a spring hunt that runs from Apr. 1–May 15, and a fall hunt that runs from Oct. 25–Nov. 30. On average over the last 5 years (RY20-RY24) there were 195 registration permits (75 spring; 120 fall) issued annually on the road system and 490 drawing permits (316 spring; 174 fall) issued in remote areas of the island.

Hunter success rates for registration and drawing hunts vary by season, but over the last 5 years success rates averaged 18% in the spring and 14% in the fall for registration hunts and 59% in the spring and 46% in the fall for drawing hunts. Successful spring hunters participating in the registration hunt spend an average of 6.4 days in the field before harvesting a bear while fall hunters spend an average of 5.1 days in the field. Successful spring hunters participating in the drawing hunt spend an average of 5.7 days in the field before harvesting a bear while fall hunters spend an average of 5.4 days in the field. Over the previous 5-year period (RY20-RY24) 25 bears (4%) (4 females, 21 males) were harvested April 1–April 15, 243 bears (41%) (36 females, 207 males) were harvested April 16–April 30; and 328 bears (55%) (66 females, 262 males) were harvested May 1–May 15 during the drawing hunts. During this same period, 0 bears were harvested April 1–April 15, 10 bears (26%) (3 females, 7 males) were harvested April 16–April 30; and 28 bears (74%) (7 females, 21 males) were harvested May 1–May 15 during the registration hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to shorten the spring brown bear season in Unit 8, and is **OPPOSED** to the unnecessary reduction of opportunity without a biological concern.

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

PROPOSAL 235 – 5 AAC 92.130(f). Restrictions to bag limit. Require wounded brown bears to count against the bag limit of one bear every four regulatory years.

PROPOSED BY: Stig Yngve

WHAT WOULD THE PROPOSAL DO? This proposal would require that brown bear wounded by hunters in Unit 8 count against the bag limit of one bear every four regulatory years.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.130. Restrictions to bag limit.

...

(f) In Units 1 - 5 and Unit 8, a black or brown bear wounded by a person counts against that person's bag limit for the regulatory year in which the bear is taken. However, in Units 1 - 5 and Unit 8, a brown bear wounded by a person does not count against that person's one bear every four regulatory years bag limit established in 5 AAC 92.132.

...

There is a negative customary and traditional use finding for brown bear in Unit 8.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Amending this regulation to require that a wounded bear count against the hunters “one bear every four regulatory years” limit may reduce the number of wounded bears each year as hunters would be more likely to conduct a thorough and proper search for the wounded animal and be more considerate of shot selection. However, because Kodiak bear permits are highly competitive and very difficult to obtain, this regulation may also discourage hunters and guides from reporting bears that were wounded and lost.

BACKGROUND: In 2007, a regulation change was proposed by the Kodiak Fish and Game Advisory Committee and supported by the Kodiak Unified Bear Subcommittee (KUBS) that requires a wounded bear count against a hunter’s bag limit for the current regulatory year in which the hunt is being conducted. The regulation was proposed to maintain a high ethical standard with regard to Kodiak bear hunts and to minimize wounding loss of bears.

Kodiak bear hunts are considered one of the premiere hunts in the world and are one of Kodiak’s foremost trophy hunts. The current regulation was initially adopted to encourage ethical hunting, promote ethical shot selection, and reduce wounding loss. Over the last 5 years (RY20–RY24), 22 bears were reported as wounded by hunters within Unit 8. The current regulation continues to be supported by the Kodiak Advisory Committee and the Kodiak Unified Bear Subcommittee and has gained widespread acceptance on Kodiak. Further, a similar proposal was submitted for the 2023 Southcentral Board of Game meeting and was failed at that time.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to require that brown bear wounded by hunters in Unit 8 count against the bag limit of one bear every four regulatory years.

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

PROPOSAL 236 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

Remove the sow restriction and penalty for resident hunters in some Kodiak brown bear hunt areas, and institute a sow skull size restriction instead.

5 AAC 92.061. Special provisions for brown bear drawing permit hunts.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would remove the sow restriction and penalties for resident hunters in Kodiak brown bear hunt areas 8 through 16, and institute a sow skull size restriction for resident hunters such that the elimination of permits for a hunt area only occurs if a sow is harvested in that hunt area with a skull size less than 15 inches in length or 9 inches in width.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.061 - Special provisions for brown bear drawing permit hunts.

(a) In the Unit 8 general brown bear drawing permit hunt, the department shall issue permits, and a hunter may apply for a permit, as follows:

- (1) the department shall issue a maximum of 40 percent of the drawing permits to nonresidents and a minimum of 60 percent to residents; each guide may submit the same number of nonresident applications for a hunt as the number of permits available for that hunt;

...

There is a negative customary and traditional use finding for brown bear in Unit 8.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would eliminate the regulation implemented at the 2023 Southcentral Board of Game meeting requiring that one (1) brown bear permit be removed from the drawing permit hunt for every female bear that was shot in hunt areas 8-16 during the preceding year. The regulation requires that the permit would be removed from the hunt area the female was killed in. For example, if a resident harvests a female bear in hunt area 9 during spring RY23, one resident permit will be removed from hunt area 9 during spring RY24. Similarly, if 2 nonresidents harvest 2 female bears in hunt area 16 in fall RY23, 2 nonresident permits will be removed from hunt area 16 in fall RY24. This regulation was intended to reduce female brown bear harvest in southwest Kodiak Island due to concerns regarding a potentially declining brown bear population in that area.

BACKGROUND: Brown bear population surveys conducted by the department in cooperation with the Kodiak National Wildlife Refuge suggest the brown bear population in southwest Kodiak Island is experiencing a decline. Results from collaborative Intensive Aerial Surveys (IAS) indicate the bear density in the Sturgeon River survey area had decreased significantly compared to historical estimates. In 2019, a comprehensive survey was conducted and a total of 55 independent bears were observed resulting in an estimated density of 102 independent brown bears/1,000 km². This estimate was similar to the previous year's (2018) density estimate of 113 independent brown bears/1000 km², but significantly less than previous estimates (e.g., 2007 [231; $p = 0.0029$], 1998 [227; $p = 0.0003$], 1992 [190; $p = 0.0111$], and 1987 [293; $p = 0.0003$]. The estimated density of independent bears recorded in 2019 was less than half the estimated mean density of four previous surveys during 1987-2007 ($102/235 = 43\%$) and was only 58% ($102/175$) of the lowest accepted management target prescribed for southwestern Kodiak Island as identified in the Kodiak Brown Bear Management Plan. Decreased bear density observed during surveys could be associated, in part, with changes in composition or rates of hunter harvest of single adult bears. However, this seems unlikely since harvest composition and harvest rates have not changed substantially in the Sturgeon River area over the last 20 years. The apparent decrease in bear density may be a result of reduced quality and quantity of forage which could compromise nutritional condition and reproductive success as well as cub and subadult survival. Although reasons for the apparent decline are unclear, the department, in cooperation with federal agencies, is investigating potential reasons for the decline including resource availability and distribution.

As outlined in the Kodiak brown bear management plan, efforts should be made to reduce harvest in areas exhibiting a potential population decline. Because female harvest has direct impacts on recruitment and population sustainability efforts should be made to reduce female harvest in the Sturgeon River area.

During the early 1990's similar concerns arose regarding the brown bear population in portions of southwest Kodiak. At that time, supporting the recommendation of the Kodiak Advisory Committee and local agency personnel, the Board of Game adopted special provisions for Unit 8

brown bear hunts in this portion of the island. The hunting provisions (5 AAC 92.061 (5)) stated,

“...in the Deadman Bay, Dog Salmon River, South Olga Lakes, Red Lake, Frazer Lake, Karluk Lake, Halibut Bay, Sturgeon River, and North Karluk River permit hunt areas, for each female bear with a skull length (posterior sagittal crest to center of upper incisors) of less than 15 inches or with a skull width (zygomatic breadth) of less than nine inches harvested in a regulatory year by a guided nonresident hunter, one permit will be deducted from the next regulatory year’s nonresident allocation for the area in which that bear was taken.”

These skull restriction provisions were in effect from RY94-RY06 and were applied only to nonresident drawing permits in Kodiak bear management areas 8-16. During the 13 years that regulation was in effect (RY94-RY06), a total of 37 sows were harvested by nonresident hunters of which 19 had skulls below the minimum size identified in regulation. The 13 years prior to the adoption of this proposal (RY81-RY93), 233 female bears were harvested (127 resident harvests, 106 nonresident harvests) in this area. Although the effect and success of these female skull size restrictions is difficult to assess, it was widely believed the prior regulation (RY94-RY06) had a positive effect on the population. The regulation was rescinded on July 1, 2007.

Since the current management strategy regarding sow harvest went into effect, nonresident hunters have harvested 1 female bear in hunt areas 8–16 and resident hunters have harvested 12 female bears in hunt areas 8–16 (5 sows in RY23 and 7 sows in RY24). This suggests that the implementation of the proposed minimum skull restrictions on female bears would do little to preserve hunting opportunity impacted by this management strategy in response to female harvest by residents or nonresidents. Although the number of female bears harvested in these hunt areas has declined since the current management strategy went into effect in 2023, the impacts of the reduced sow harvest is difficult to assess in the limited time the regulation has been in place.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal to remove the sow restriction and penalties for resident hunters in Kodiak brown bear hunt areas 8–16 and institute a sow skull size restriction for resident hunters. Brown bear population goals and objectives are under the department’s management authority. The department currently uses the sow harvest penalty to maximize hunting opportunity over time. As noted above, none of the 13 sows harvested were smaller than the proposed minimum skull size requirement, so even if the department were interested in a skull-size based penalty, the proposed one would have zero effect on hunting opportunity.

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

PROPOSAL 237 – 5 AAC 92.061. Special provisions for brown bear drawing permit hunts.

Require all nonresident hunters to apply for Unit 8 brown bear drawing permits and reallocate unused nonresident permits to residents.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would require all nonresident hunters to apply for Unit 8 brown bear drawing permits and reallocate unused nonresident permits to residents.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.061. Special provisions for brown bear drawing permit hunts.

(a) In the Unit 8 general brown bear drawing permit hunt, the department shall issue permits, and a hunter may apply for a permit, as follows:

(1) the department shall issue a maximum of 40 percent of the drawing permits to nonresidents and a minimum of 60 percent to residents; each guide may submit the same number of nonresident applications for a hunt as the number of permits available for that hunt;

(2) the department shall enter, in a resident drawing, each application from a resident and each application from a nonresident accompanied by a resident relative who is within the second degree of kindred; for each season, the department shall issue a maximum of four permits to nonresident hunters accompanied by a resident relative who is within the second degree of kindred; however, the department may not issue, within one calendar year, more than one of these permits per individual hunt, as described in the permit hunt guide published each year by the department;

(3) the department shall enter, in a guided nonresident drawing, each complete application from a nonresident who will be accompanied by a guide; the department may enter an application and issue a drawing permit for the general hunt only to a successful nonresident applicant who presents proof at the time of application that the applicant will be accompanied by a guide, as required under AS 16.05.407 or 16.05.408;

(4) the following provisions apply to a guided nonresident drawing under this section:

(A) an applicant for a guided nonresident drawing permit may apply for one such permit for for all hunts and one such permit for spring hunts;

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

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

(D) if a guided nonresident drawing permit is available, but the alternate list is exhausted, the permit becomes available, by registration at the Kodiak ADF&G office, to the first applicant furnishing proof that the applicant will be accompanied by a guide;(5) repealed 7/1/2007.

There is a negative customary and traditional use finding for brown bear in Unit 8.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require all nonresident hunters to apply for Unit 8 brown bear drawing permits and reallocate unused nonresident permits to residents. This would specifically modify section (D) to make permits available through the registration process only available to resident hunters, reallocating those permits from nonresident permit allocations to resident allocations.

BACKGROUND: Hunters interested in brown bear hunting on Kodiak Island can participate in a Kodiak brown bear hunt 2 different ways, either by participating in a registration hunt on the Kodiak road system or by entering the statewide drawing process. As outlined in the “Alaska Drawing Permit Hunt Supplement”, nonresident hunters wanting to participate in a Kodiak drawing hunt must meet certain requirements prior to being entered into the draw. Similar to residents, nonresident hunters must obtain or have applied for an Alaskan big game hunting license prior to applying for a hunt. In addition, nonresident hunters are required to obtain the services of an Alaska-licensed guide and must have a signed guide-client contract before or at the time of application. Once a nonresident has obtained the services of an Alaska registered guide the hunter can apply online. As outlined in the Alaska Drawing Hunt Supplement hunters, “...must apply online...” and “There is NO REFUND of application or license fees.” Further, in addition to the purchase of a hunting license, there is a fee each time a hunter applies for a drawing hunt. The cost for applying for a brown bear hunt is \$5.

The scenario of nonresident hunters or their guides not applying for drawing permits or paying fees is most likely to occur with hunters hunting in Exclusive Guide Use Areas. Exclusive Guide Use Areas are areas in which only certain guides are permitted to take nonresident bear hunters; resident hunters are also allowed to hunt in these areas. Guided nonresident hunters wishing to hunt in these areas are only permitted to hunt with the guide registered for that area. Because some hunt areas are entirely comprised of an Exclusive Guide Use Area in which only one guide is allowed to take clients, some guides choose not to submit hunt applications for their nonresident clients in these areas, and instead rely on 5 AAC 92.061(4)(D) which allows the permits to be made available on a first-come, first-served basis.

Hunters who are successful in drawing a Kodiak brown bear drawing permit have until a certain date (usually 2.5 to 3 weeks prior to the start of the season) to cancel, in writing, their Kodiak brown bear drawing permit. Hunters who do not cancel their permit prior to the deadline will not be eligible for a Kodiak brown bear drawing permit for the remainder of the regulatory year. Permit cancellations will not be accepted after the deadline. If a successful nonresident applicant cancels their permit prior to the deadline for cancellations, the department will choose an

alternate for that permit from the nonresident alternate list. Alternate lists for nonresidents for each hunt are produced during the drawing permit application process. If there are no nonresident alternates available for the hunt, cancelled permits will be issued on a first-come, first-served basis starting on a pre-determined date (commonly 2 weeks prior to the start of the season) and up until the start of the season. No cancelled or undersubscribed permits will be issued after the start of the season. Because most cancelled nonresident permits are reallocated to an alternate via the nonresident alternate list, “unused” nonresident permits are not common. Over the last 5 regulatory years (RY20-RY24), 51 nonresident permits have gone unused and could be available for reissuance to another hunter. However, last minute cancellations limit the potential of a new hunter being able to participate on short notice. Participation in Kodiak brown bear hunts by nonresidents is typically high, limiting the number of nonresident bear permits that go unused. Over the last 10 regulatory years (RY15-RY24), nonresidents have an average of an 85% participation rate in Kodiak drawing bear hunts and residents have averaged a 53% participation rate, highlighting the high participation rate of nonresident hunters.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to require all nonresident hunters apply for Unit 8 brown bear drawing permits and reallocate unused nonresident permits to residents due to its allocative nature. Given the complexities of drawing brown bear hunts in Unit 8, proposals addressing permit issuance are allocative. This proposal does not create nor address a conservation concern.

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

PROPOSAL 238 – 5 AAC 92.003. Hunter education and orientation requirements.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would require residents hunting brown bear in Unit 8 to complete an online education course specific to Kodiak Island.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.003. Hunter education and orientation requirements.

...

(o) When participating in a hunt that requires a department-approved education or orientation course under this section, a person must have proof of course completion in possession.

...

The Alaska Board of Game (BOG) has made a negative customary and traditional use finding for brown bear in Unit 8.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would require residents hunting brown bears in Unit 8 to complete an online education course that is designed specifically for Kodiak Island brown bears. Because no course currently exists, this proposal would require the department to create an online course specific to Kodiak Island that identifies methods hunters can apply to determine age and sex of brown bears. This proposal would promote further educating hunters on methods to identify bear age class and gender prior to going hunting. It may also reduce the number of females harvested each year as hunters would presumably be more diligent about sex identification prior to shooting a bear and select for larger male bears.

BACKGROUND: Kodiak brown bear hunts are closely managed and all hunters obtaining Kodiak brown bear permits are required to pick up their permit at the Alaska Department of Fish and Game office in-person in Kodiak prior to going hunting. All hunters receiving Kodiak brown bear drawing permits are sent a letter a few months prior to their hunt providing general information about the hunt as well as outlining rules and regulations pertaining to bear hunting on Kodiak. The letter each hunter receives includes information on obtaining tags, reporting requirements, and hunter safety as well as encourages hunters to visit the ADF&G Kodiak bear hunting webpage to learn more about hunting on Kodiak, including information on identifying male and female bears. In addition to receiving a letter in the mail, when hunters arrive at the Kodiak office to obtain their permit, they are required to attend a 2–3-minute presentation covering the Kodiak Bear Hunter Checklist. This presentation covers various topics including expectations of the hunt, current hunting regulations, information regarding legal animal requirements, as well as reporting requirements for successful and unsuccessful hunters. After the presentation and when receiving their permit, each hunter is provided an Alaska Department of Fish and Game booklet titled, “Brown Bear: Identifying males and females in the field”. Hunters are encouraged to read the booklet and review the methods to identify male and female bears in the field prior to going hunting.

One of Kodiak’s brown bear management objectives is to maintain a stable brown bear population that will sustain an annual harvest composed of at least 60% males. To prevent female harvest from exceeding 40%, Kodiak staff provide different resources to hunters specifically addressing the identification of male and female bears. It appears these efforts have been successful as average annual harvest of females very rarely exceeds 40% of the overall harvest. Over the past 10-years (RY15–RY24), the average annual proportion of female harvest for drawing and registration hunts combined was 26%. Kodiak Island has a robust, healthy, and stable brown bear population that consistently produces high-quality trophy male bears while providing sustained hunting opportunities.

DEPARTMENT COMMENTS: The department supports hunter education and orientation, however it is **NEUTRAL** on this proposal to require residents hunting brown bear in Unit 8 to complete an online education course specific to Kodiak Island brown bears. All Kodiak brown bear permits must be obtained in person in the Kodiak ADF&G office at which time an orientation is provided. Extensive material is also available to hunters to assist in identifying male and female brown bears. Current female bear harvest is sustainable and within management objectives. In addition, the department is currently preparing educational material for other species and will need time to complete this requirement if the proposal is adopted

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department for preparation of the online orientation.

PROPOSAL 239 – 5 AAC 85.065(a)(4) Hunting season and bag limits for small game.

Reduce the daily bag limit for sea ducks and require accurate harvest logs on multi-day transporter hunts in Unit 8.

PROPOSED BY: Alexis Kwachka

WHAT WOULD THE PROPOSAL DO? The proposal seeks to reduce the daily bag and possession limits for sea ducks and/or require harvest logs on multi-day ‘transporter’ hunts in Unit 8. Daily bag limits are requested to be reduced by an unspecified amount (by half is mentioned) and would apply to both residents and nonresidents that use transporters. The department interprets ‘transporter’ as a registered migratory game bird guide but also recognizes that some outfitters/lodges supply equipment (e.g., boats) for self-guided hunts that, for purposes of this proposal, are considered something other (i.e., a transporter) than a registered migratory game bird guide.

WHAT ARE THE CURRENT REGULATIONS? Regulation 5 AAC 92.013 requires a migratory game bird guide in Alaska to register with the department prior to providing services each year but does not require reporting of guided hunter harvest; there is no regulation that requires the department to record hunter harvest of migratory game birds in Alaska. However, regulation 5 AAC 92.018 requires hunters that possess an Alaska waterfowl conservation tag (i.e., state duck stamp) to register with the Migratory Bird Harvest Information Program (HIP) as part of the National Migratory Bird Harvest Survey conducted by the U.S. Fish and Wildlife Service (USFWS).

The following is the regulation for bag limits of sea ducks in Unit 8, unmodified since 2001:

5 AAC 85.065(a)(4)(B) Sea Ducks (except Spectacled and Steller's eiders)

Units and Bag Limits	Resident Open Season	Nonresident Open Season
Units 8 and 10 (except Unimak Is.)		
RESIDENT HUNTERS: 10 per day, 20 in possession, of which no more than 6 per day, 12 in possession, may be harlequin ducks and no more than 6 per day, 12 in possession, may be long-tailed ducks	Oct. 8 – Jan. 22 (General hunt only)	
NONRESIDENT HUNTERS: 7 per day, 20 in possession; however, no more than 4 each of any sea duck species may be taken per season; and no more than 20 sea ducks of all species may be taken per season		Oct. 8 – Jan. 22

The Alaska Board of Game (board) made a positive customary and traditional use finding for migratory game birds in all units with a harvestable surplus. The board has not determined an amount reasonably necessary for subsistence.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The opportunity for resident and nonresident hunters in Unit 8 on multi-day transport or guided hunts only would be reduced, and likely an accompanying reduction in sea duck harvest. Also, the department would be required to develop and administer a system for transported or guided hunters to report their sea duck harvest in Unit 8.

BACKGROUND: In 2002, the board adopted a regulation (5 AAC 92.013) that requires migratory game bird guides to register annually with the department to provide a means of tracking guiding activity across the state. However, neither this regulation nor federal regulation requires guides to record and report bird harvest or client information, primarily because annual harvest of migratory game birds, including sea ducks, is estimated via the National Migratory Bird Harvest Survey (National Survey) conducted by the USFWS. The National Survey monitors annual harvest in the U.S. using three programs: the Harvest Information Program (HIP), a diary survey, and a Parts Collection Survey. The department participates in the HIP, which requires

licensed migratory game bird hunters to annually register with the program in each state they hunt (in Alaska, hunters register for the HIP with purchase of the state duck stamp). The USFWS uses the HIP registration to draw and stratify a statistical sample by state to voluntarily participate in a diary survey designed to record their hunting activity throughout a given season. The HIP registration also provides a sampling framework for the Parts Collection Survey, which estimates species, age, and sex composition of the annual harvest – a form of reporting validation for the diary survey. Data from both surveys are used to estimate species-specific harvest estimates for each state and nationwide. Guided hunters in Alaska may be selected to participate in these surveys.

The proposal is seeking to require more narrowly-focused harvest reporting from only multi-day guided (or transported) sea duck hunts in Kodiak (Unit 8). Notably, this level of reporting would provide only partial assessment of sea duck harvest in Kodiak and would likely require a voluntary system of validation (i.e., Parts Collection Survey) to assess accuracy of reported harvest composition to estimate harvest of guided hunts. A Parts Collection Survey would be costly and labor-intensive to implement, even at a small scale, and likely subject to bias by nonrandom sampling. Further, harvest data best informs regulatory decisions when considered alongside species-specific population assessments. In this instance, however, there are no contemporary population surveys of sea ducks in Kodiak during the fall-winter period that would provide reference for localized harvest data, thus diminishing the interpretability and utility of harvest logs.

Most waterfowl populations are assessed via large-scale aerial surveys during the breeding period when survey conditions are favorable, and birds are largely concentrated. However, the biology of sea ducks often complicates these efforts, and existing surveys are not well suited for monitoring sea ducks, particularly in Alaska. Breeding bird surveys tend to be incomplete assessments of sea ducks due in part to availability bias, low detection, and incomplete species identification. Surveys during the non-breeding period (e.g., fall-winter) would likely provide a more reasonable assessment of harvestable sea duck populations, but these are less feasible because sea ducks tend to be distributed across large geographic expanses of coastline in remote marine habitats that are not easily accessible nor logistically practical (or safe) to survey. In Alaska, the population status and trends of many sea duck species are derived from three larger scale aerial breeding bird surveys conducted by the USFWS: the Alaska-Yukon portion of the continent-wide Waterfowl Breeding Population and Habitat Survey and regional-scale Yukon-Kuskokwim Delta and Arctic Coastal Plain surveys. Long-term annual indices from these surveys have shown population declines in many sea duck species between the 1970s and mid-1990s; for example, eiders, scoters, and long-tailed ducks experienced apparent declines of more than 50%. Reasons for these declines are unknown, but since the 1990s many sea duck populations have rebounded and trends have either stabilized or are increasing, although abundances remain below historical population levels. Despite these surveys being incomplete assessments, sea duck population abundance is likely in the tens to hundreds of thousands in Alaska.

Management of sea ducks in Alaska is focused primarily at the statewide level, in part because population and harvest information is gathered at large geographic scales. With a few exceptions, past changes to sea duck regulations were comparable across all five hunt zones in the state. In 1999, with guidance from the USFWS, the Board of Game (board) adopted moderate restrictions statewide to bag limits in response to general concerns over large-scale and long-term declining trends in some sea duck species. Bag limits for sea ducks were reduced for residents from 15 to 10 daily, and restricted nonresidents to 20 sea ducks per season and no more than 4 each of any species. In 2001, the board further limited statewide regulations for residents to no more than 6 daily for harlequin ducks and long-tailed ducks. The department suggested these modifications were appropriate and represented a practical balance of precautions over resource concerns and retention of sea duck harvest opportunity across Alaska, including the needs of subsistence users.

In subsequent board cycles, however, the public expressed concerns over perceived localized depletions of sea ducks at smaller scales (i.e., unit or subunit). In response, the board directed changes to regulations as follows: in 2010, resident and nonresident bag limits were further reduced in Unit 15C for harlequin ducks and long-tailed ducks to no more than 2 daily and for eiders to no more than 1 daily; and in 2023, resident and nonresident bag limits for long-tailed ducks were restricted to no more than 1 daily in Units 7 and 15. The department indicated there was no evidence of localized depletion but also noted that there are few reasonable opportunities to monitor population status or harvest at small geographic scales.

The number of hunting guides in Alaska specializing in waterfowl, including sea ducks, is modest with a small proportion operating in Unit 8. In 2024, the department registered 133 waterfowl guides, of which 21 stated their intent to guide in the Kodiak Archipelago. Past data indicated that guiding for migratory game birds for most registered guides (~70%) was ancillary to guiding for big game or sportfish, and this is likely the case for most guided waterfowl hunts in Unit 8. However, the department lacks harvest data for sea ducks specific to Unit 8 particularly from guided hunts, although statewide annual harvest of sea ducks in Alaska is relatively low (13% of total duck harvest). The National Survey estimated annual average sea duck harvest in Alaska at about 7,900 sea ducks, by an annual average of 1,580 hunters at approximately 5 birds per hunter per season.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Sea duck management is focused primarily at the statewide scale, with consideration for regional scale (i.e., hunt zone) management when appropriate. Further, the department has no practical or reliable means of monitoring population trends and harvest at small geographic scales across the state that might direct localized regulatory decisions. Sea ducks are harvested at relatively low levels in Alaska, and there is no evidence of discrete winter assemblages of sea ducks that require special attention. Moreover, restrictions to a segment of hunters in a single unit are unlikely to provide meaningful conservation benefit to sea duck populations in Alaska.

The department also notes that current statewide species-specific harvest estimates for sea ducks are provided through the national harvest survey conducted annually by the USFWS. A secondary reporting system for a segment of the hunting community is unlikely to produce useable harvest estimates, even at a small-scale (e.g., Unit 8), without allocating substantial departmental time and resources. Further, lacking population information at a corresponding scale, harvest data are absent context and impractical for harvest management; and the department cautions that without an independent assessment of species composition (i.e., Parts Collection Survey), harvest reporting is susceptible to inaccuracies from species misidentification. Implementing a small-scale and costly harvest reporting system for guided sea duck hunts in Unit 8 may serve only to burden department resources without fostering informed sea duck management.

To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Adoption of this proposal would result in additional costs to the department for development, administration, and communication of a harvest reporting system for guided sea duck hunts in Unit 8, and an associated Parts Collection Survey to validate harvest reports.

PROPOSAL 250 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

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

- (a) A resident tag is not required for taking a brown bear in the following units: (4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

PROPOSED BY: The Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would reauthorize the current resident tag fee exemptions for brown/grizzly bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

WHAT ARE THE CURRENT REGULATIONS? Brown/grizzly bear tag fees and locking tags are not required for residents in Units 12, 19, 20, 21, 24, 25, 26B, and 26C. The customary and traditional use findings and amounts reasonably necessary for subsistence are presented below:

Customary and Traditional Use findings, and Amounts Reasonably Necessary for Subsistence Uses, brown bear populations, Region III (5 AAC 99.025 (3)):

Unit	Finding	Amount reasonably necessary for subsistence
Unit 12	Negative	---
Units 19A and 19B upstream of and excluding the Aniak River drainage, and Unit 19D	Positive	10–15
Units 19A and 19B downstream of and including the Aniak River drainage	Positive	5
Unit 19C	Negative	---
Unit 19D	Positive	2–6
Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Use Area and Unit 20C	Positive	1–3
Unit 20D, outside the boundaries of the Fairbanks Nonsubsistence Area	Positive	1–2
Unit 20E	Negative	---
Units 21 and 22	Positive	20–25
Units 23, 24, and 26	Positive	25–35
Unit 25A, 25B, 25C	Negative	---
Unit 25D	Positive	None made

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 2014–2024, approximately 20% of brown bears harvested by resident hunters in Region III were taken incidentally to other activities, compared with 8% 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.

PROPOSAL 251-5 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 permit hunts in Units 18, 22, 23, and 26A. Below are the customary and traditional use findings and amounts reasonably necessary for subsistence for subsistence uses of brown bears in Units 18, 21, 22, 23, 24, and 26:

Game Management Unit	Finding	Amounts Reasonably Necessary
Unit 18	Positive	23-30
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; and 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 the department thinks they are biologically 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.

PROPOSAL 254 - 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 and nonresident hunters in Unit 18. It is allowed for resident hunters in 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 remain from the fall quota. Antlerless moose hunting is 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.

Antlerless hunting during fall and winter seasons is allowed for resident hunters in the “Remainder of Unit 18.” There are 3 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 3 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. Up to 100 permits may be issued for this hunt.

There is a positive customary and traditional use finding for moose in Unit 18 and an amount reasonably necessary for subsistence of 200–400 moose. There is a positive intensive management finding for moose in Unit 18, and a population objective of 1,000-2,000 moose and a harvest objective of 60-200.

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 regulatory year (RY) 2026. Hunters would have the same seasons and bag limits as RY2025 (see Current Regulations above).

BACKGROUND: Antlerless moose seasons must be reauthorized annually. Both these 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 RY2024 (n=533) is above the previous 3-year average harvest (n=453). In RY2024, the harvest ticket reports from the remainder of Unit 18 included 147 cows harvested, along with the harvest of 386 bull moose. The combined harvest for the remainder of Unit 18 represented in this reauthorization is well within sustained yield parameters, and the population trajectory has not been affected by antlerless harvests.

RY2017 was the first year the board authorized antlerless hunts for nonresidents. A total of 9 cow moose have been harvested by nonresidents in Unit 18: 2 moose in 2020, 2 moose in 2022, 1 in 2023 and 4 in 2024. We expect nonresident harvest to remain low during the antlerless season.

In total, five antlerless moose (3 cows, 2 bulls) have been reported harvested in the Goodnews hunt area since 2019.

Preliminary results from the Kuskokwim hunt area antlerless hunt includes 84 hunters who reported hunting and harvesting 49 antlerless moose.

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 255 – 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
...
Unit 19(D), that portion 2 miles on either side of the Kuskokwim River from the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim River, and 2 miles on either side of the South Fork of the Kuskokwim River from the mouth to Nikolai, and 2 miles on either side of the Takotna River from the mouth to the bridge at Takotna, excluding the Black River drainage and the Selatna River drainage		
...
1 antlerless moose by drawing permit only; up to 20 cows may be taken; or	Sept. 1 – Sept. 30 (General hunt only)	No open season
1 moose by registration permit only; a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season
...
Unit 19(D), that portion of the Black River drainage excluding that portion within 2 miles of the Kuskokwim River, and that portion of the Selatna River drainage north of the Selatna River, and excluding that portion within 2 miles of the Kuskokwim River.		

...
1 antlerless moose by drawing permit only; up to 20 cows may be taken	Sept. 1 – Sept. 30 (General hunt only)	No open season
...
Unit 19(D) Remainder		
...		
1 antlerless moose by drawing permit only; up to 20 cows may be taken; or	Sept. 1 – Sept. 30 (General hunt only)	No open season
1 moose by registration permit only; a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season
...

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 6,000 - 8,000 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 fall antlerless drawing hunt moose opportunity in Unit 19D upstream of the Selatna River.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. This proposal would 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 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 has approximately doubled since predator removals began in 2003 before declining after 4 consecutive years of very deep snow (winters 2019/2020 through 2022/2023; Figure 1). Prior to intensive management, the department measured bull-to-cow ratios along the Kuskokwim River drainage at 18 bulls per 100

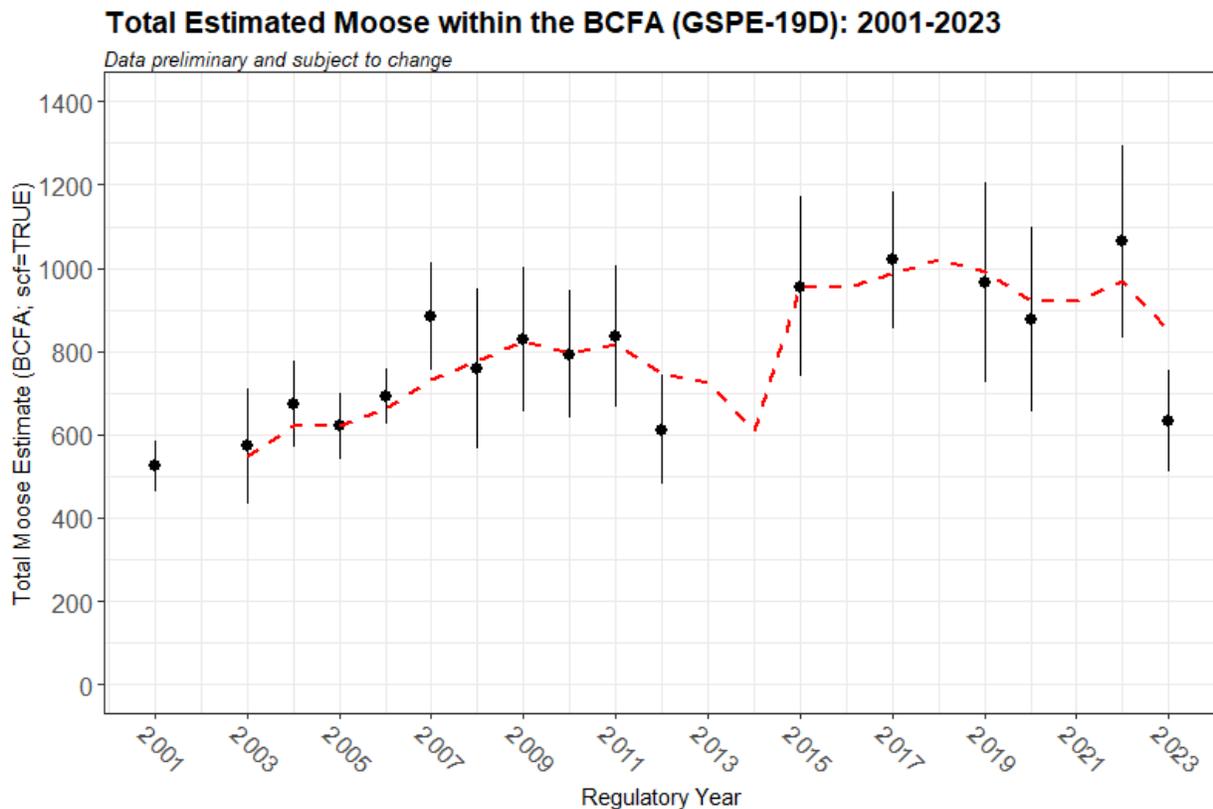


Figure 1. GSPE population estimate within the Bear Control Focal Area (BCFA) using a sightability correction factor for GMU 19D 2001-2023. Points and vertical lines indicate annual population estimates and 90% Confidence Intervals. The dashed red line is the 3-year moving average of the GSPE point estimate.

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 was 25 bulls per 100 cows (Figure 2).

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

Data preliminary and subject to change

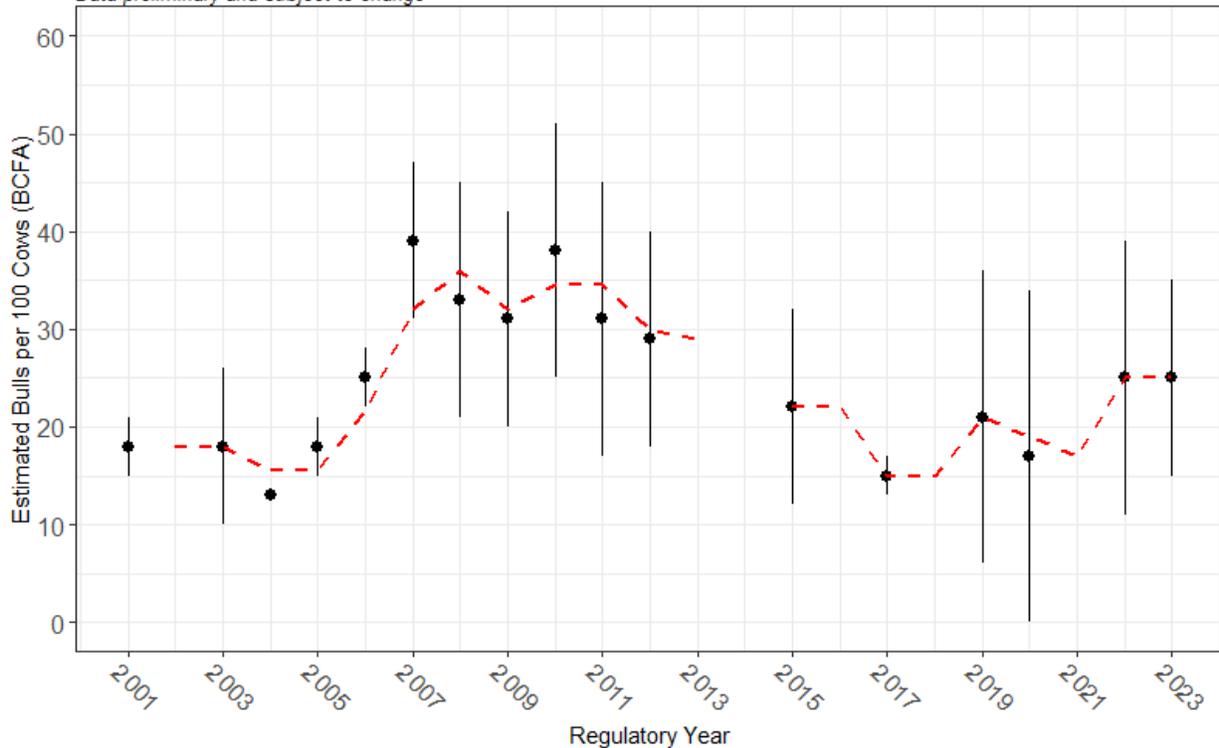


Figure 2. Bull-to-cow ratios within the Bear Control Focal Area (BCFA) derived from GPSE surveys in GMU 19D 2001-2023. Points and vertical lines indicate annual estimate ratios and 90% Confidence Intervals. The dashed red line is the 2-year moving average of bull-to-cow ratio point estimates.

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/mi²) to 1,591 moose (1.4 moose/mi²). Due to this decline the department closed the winter hunt in regulatory year (RY) 2023 by emergency order. Proposal 66, passed by the Board of Game (board) in March 2024, authorized a new draw permit hunt in the fall for cows in a portion of Unit 19D. Proposal 66 was submitted by the McGrath advisory committee and passed by the board 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 contributes 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.

PROPOSAL 256– 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 authorized in Unit 20A by drawing, registration, or targeted permit hunts, as follows:

Ferry Management Trail, Wood River Controlled Use, and the Yanert Controlled Use Area
Residents only:

- One antlerless moose by drawing permit. Up to 2,000 permits may be issued in combination with the remainder of Unit 20A, and taking a cow accompanied by a calf is prohibited. Season dates of August 15–November 15.
- One moose by shotgun, crossbow, or bow and arrow by targeted permit. Up to 100 permits may be issued with season dates announced by emergency order.
- One antlerless moose by registration permit, and taking a cow accompanied by a calf is prohibited. Season dates of October 1–last day of February.

Remainder of Unit 20A

Residents only:

- One antlerless moose by drawing permit. Up to 2,000 permits may be issued in combination with the Ferry Trail Management Area, the Wood River Controlled Use Area, and the Yanert Controlled Use Area, and taking a cow accompanied by a calf is prohibited. Season dates of August 15–November 15.
- One moose by shotgun, crossbow, or bow and arrow by targeted permit. Up to 100 permits may be issued with season dates announced by emergency order.
- One antlerless moose by registration permit, and taking a cow accompanied by a calf is prohibited. Season dates of October 1–last day of February.

Hunts for bull moose are also available in Unit 20A. Refer to the *2025–2026 Alaska Hunting Regulations* for specific details about bull moose hunting seasons in Unit 20A.

The Unit 20A intensive management (IM) population objective is 10,000–15,000 moose and the IM harvest objective is 500–900 moose. There is a positive customary and traditional use finding for moose in Unit 20A outside the boundaries of the Fairbanks Nonsubsistence Area (NSA) 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 antlerless harvest opportunity inside the NSA and subsistence moose hunting opportunity outside the NSA

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. Unit 20A antlerless hunts help regulate population growth, provide subsistence hunters with a reasonable opportunity to harvest moose, and provide for additional harvest opportunity.

To determine Unit 20A antlerless harvest rates, the department uses a decision framework that incorporates population size in relation to the IM population objective, population trend, nutritional status, and bull-to-cow ratio estimates. Following a decline in the moose population from an estimated 14,041 (90% confidence interval (CI) \pm 1,732; 2.79 moose/mi²) in fall 2021 to 11,029 (90% CI \pm 1,680; 2.19 moose/mi²) in fall 2022, the department took a conservative approach and did not issue any antlerless permits for regulatory year (RY) 22–RY24.

The population appeared to stabilize within the IM population objectives between fall 2022 and fall 2024, when the population was estimated at 11,696 (90% CI \pm 1,541; 2.32 moose/mi²) moose. However, the population has a high potential for growth given the well above-average calf-to-cow ratio of 38 calves:100 cows estimated during the 2024 survey. This potential for population growth in addition to continued moderately-low nutritional levels (assessed via twinning rates and short-yearling weights) contributed to the department’s decision to offer a small level of antlerless drawing permits within the unit for fall 2026. The department will also offer a limited number of antlerless moose registration permits within the portion of Unit 20A outside the NSA to provide for additional subsistence opportunity. The goals of the drawing and registration antlerless permits are to harvest <1% of the moose population to slow growth and keep the population within IM population objectives, to allow for additional sustainable harvest opportunity to help meet IM harvest objectives, and to provide for additional subsistence opportunity.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal because antlerless hunts are an important management tool in regulating this high-density moose population. If antlerless moose hunts are not reauthorized, the department will lose the ability to regulate this moose population within IM population objectives and according to changes in nutritional status, and IM harvest objectives may not be met. Additionally, the public will lose the opportunity to hunt for a harvestable surplus of antlerless moose, when harvestable surplus exists.

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

PROPOSAL 258 – 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 30 permits available. Current antlerless moose (except a calf or a cow accompanied by a calf) seasons in Unit 20D are as follows:

- 20D Southwest Youth Moose Hunt (YM763): youth (ages 10 to 17) hunters that are residents; one antlerless moose; however, a calf or cow accompanied by a calf may not be taken; September 16–25. One moose per lifetime.
- 20D Southwest Youth Moose Hunt (YM765): youth (ages 10 to 17) hunters that are residents; one bull moose; September 16–25. One moose per lifetime.
- Purple Heart Recipient Hunt (DM795): qualified Purple Heart Recipient, 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
- Bison Range Youth Moose Hunt (YM792): youth (ages 10 to 17) hunters that are residents; one bull per lifetime, with spike-fork or 50-inch antlers or 4 or more brow tines on one side, or one antlerless moose; however, a calf or cow accompanied by a calf may not be taken; September 1–30. (Not currently offered.)
- Southwest Unit 20D drawing hunt (DM791) excluding the Delta Junction Management Area; resident hunters; one antlerless moose; however, a calf or cow accompanied by a calf may not be taken; October 10–16. (Not currently offered.)

Moose in that portion of Unit 20D that is north of the Tanana River and outside the boundaries of the Fairbanks Nonsubsistence Area (FNSA) have a positive customary and traditional use (C&T) finding and an amount reasonably necessary for subsistence of 5–15 moose. Moose populations in that portion of 20D that is outside the FNSA south of the Tanana River also have a positive C&T finding and an ANS of 5 moose.

In addition to these drawing hunts, the registration hunts being reauthorized will also be retained in the codified regulation for the department to utilize in reducing or maintaining the moose population in some areas of southern Unit 20D by increasing antlerless harvest.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will allow antlerless hunts to continue to be available to hunters if a harvestable surplus exists and allow the department to use antlerless hunts as a tool to regulate the moose population.

BACKGROUND: Antlerless moose hunting seasons must be reauthorized annually. The primary goals of the Unit 20D antlerless hunts are to regulate moose population growth at levels the habitat can support, provide harvest opportunity to make progress towards IM harvest objectives, and provide hunters with an additional opportunity to pursue moose without reducing bull-to-cow ratios. The department limited antlerless hunts in Unit 20D following the severe winter of 2021–2022, which caused deep snow and icing events and resulted in a decline in the moose population. However, a conservative number of antlerless hunts have since occurred with the primary goal of maintaining a stable population size. Department research indicates that moose populations should be managed for stability when 10-month-old calves weigh at least 385 pounds, and the 2-year average twinning rate is 11–20%. In Unit 20D, the two-year (2024 and 2025) average twinning rate was 19.5%. In 2025, mean weight for short yearling females was 391 lbs, this was the first year unit 20D had mean weights over the 385 lb. threshold. These indicators suggest that the population reduction following the harsh winter may have improved moose nutrition. Furthermore, a reduction in browse offtake from 41% in 2022 to 21% in 2023 and increasing short yearling weights also supports improved nutritional condition for moose in Unit 20D.

Previous studies of antlerless hunts in interior Alaska have demonstrated that an antlerless harvest rate of 1% of the total population is generally effective for maintaining a stable population trend. The department intends to adjust the number of antlerless moose permits needed to maintain a healthy moose population in Unit 20D and plans to issue <30 drawing permits for antlerless moose in regulatory year 2026 while continuing to monitor density-dependent indices of nutritional condition.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. There are no biological concerns associated with a limited harvest of antlerless moose taken under the current regulatory framework in Unit 20D. 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.

PROPOSAL 259 – 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 registration any-moose season (RM831) 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?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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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 has made a positive customary and traditional use finding for moose in all of Unit 21 and established an amount reasonably necessary for subsistence of 600–800 moose.

The board has identified 21D moose as an important species for consumptive uses, with an Intensive Management (IM) 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 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 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 2025 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 levels that are too low. For the March RM831 hunt, hunters harvested 5 cows and 3 bulls in 2019, 11 cows and 3 bulls in 2020, 7 cows and 1 bull in 2021, hunters did not report moose harvested in 2022 or 2023, reported one cow harvested in 2024, and 4 cows in 2025. Since the department first implemented hunt in 2019, the average annual harvest has been 5 moose.

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 (RY) 2015–2024 was 388 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 estimated combined harvestable surplus is 1,095 moose for Unit 21.

This antlerless moose hunt area is approximately 2,559 mi² (21%) of the 12,093.6 mi² encompassed by Unit 21D. The department estimated moose abundance in the hunt area 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 of —Squirrel Creek, Pilot Mtn., and Kaiyuh Slough —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 ($\pm 11\%$) moose in 2011 to 4,116 ($\pm 10\%$) moose in 2017. Moose twinning data for the winter any-moose hunt area showed high twinning rates since RY03 (average = 35.9%), with the 3-year average (RY22-24) at 37.0%.

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.

PROPOSAL 260 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish & Game

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the antlerless winter moose hunt in Unit 21E.

WHAT ARE THE CURRENT REGULATIONS? The current regulations as defined in

85.045(a) are:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
Unit 21(E)		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, a person may not take a cow accompanied by a calf	Feb. 15 – Mar. 15	
...		

There is a positive customary and traditional use finding for moose in Unit 21. The amount reasonably necessary for subsistence is 600 to 800 moose (5 AAC 99.025(8)).

Unit 21E also has a positive intensive management (IM) finding with a population objective of 9,000 – 11,000 moose and a harvest objective of 550 – 1,100 moose (5 AAC 92.108).

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 2025 indicated there were 11,400 moose in Unit 21E, which is above the IM population objective of 9,000-11,000 moose. The average bull-to-cow ratio from the last 3 fall surveys (2018, 2022, 2024) was 40 bulls per 100 cows, with the most recent estimate in 2024 of 33 bulls per 100 cows.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density has increased from 1.0 moose/mi² in 2000 to 2.0 moose/mi² in 2025. During most of these years of growth, twinning rates have remained high. Twinning surveys were conducted in 2024 and 2025 in the Holy Cross area, and the average twinning rate for those 2 years was 41%. Browse utilization remains high in the Holy Cross area where the population density is highest and where winter mortality in deep snow years is a concern. Harvest in areas of high browse utilization reduces pressure on moose in those areas during deep snow winters. The opportunity for additional harvest is available, particularly in the area around Holy Cross.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. There are additional moose available for harvest in Unit 21E and providing additional opportunity for harvest through this antlerless winter hunt will help achieve harvest objectives.

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

PROPOSAL 261 – 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, with antlerless hunting with a 1 moose bag limit allowed July 1–September 14.

There is a positive customary and traditional use finding for moose in Unit 26, and an amount reasonably necessary for subsistence of 21–48 moose, including 15–30 moose 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 department conducted the most recent minimum count in 2017 and estimated 339 moose on the landscape. Reported moose harvest in recent years has remained low, ranging from 1 to 13 moose for the period 2010-2020. Moose in these regions can be an important 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. 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. The small number of antlerless moose harvested under the hunt have very little impact on the size of the population. Keeping an antlerless moose season in this portion of Unit 26A provides additional harvest 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 yet can provide subsistence harvest opportunity.

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