

**ALASKA DEPARTMENT OF FISH AND GAME**  
**STAFF COMMENTS FOR PROPOSALS 70, 73-82, 85, 91-92, AND 95-96**  
**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 70 – 5 AAC 85.040(3). Hunting seasons and bag limits for goat.** Restrict hunters who take a nanny in Units 6, 7, 14C or 15 from hunting goats in 6, 7, 8, 14C, or 15 for 5 regulatory years.

**PROPOSED BY:** Bradley Golden

**WHAT WOULD THE PROPOSAL DO?** Both resident and nonresident hunters who harvest a nanny in Units 6, 7, 14C, or 15 would not be able to hunt goats anywhere in Region 2 (Units 6, 7, 8, 14C, or 15) for 5 regulatory years.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 85.040**

<b>Units and Bag Limits (2)</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Units 6(C) and 6(D)  1 goat by registration permit only; however, if a nanny is taken, the hunter is prohibited from taking a goat in Unit 6 for 5 regulatory years; the taking of nannies with kids is prohibited	Sept. 15—Jan. 31	Sept. 15—Jan. 31
Remainder of Unit 6  1 goat by registration permit only; however, if a nanny is taken, the hunter is prohibited from taking a goat in Unit 6 for 5 regulatory years; the taking of nannies with kids is prohibited	Aug. 20—Jan. 31	Aug. 20—Jan. 31
(3)		
Unit 15(C), that portion beginning at the mouth of Jakalof Creek, then southwesterly along the shore of Kachemak Bay to the mouth of the Port		

Graham River, then southeasterly up the Port Graham River approximately 6 miles, then southerly up the south fork to the divide, then easterly across the divide to the main drainage that flows into Windy Bay, then southeasterly down the creek to Windy Bay, then easterly along the shoreline to the mouth of Rocky River, then northerly up Rocky River and Windy River to the divide separating Windy River from Jakalof Creek, then across that divide to Jakalof Creek, then down Jakalof Creek to the point of origin

1 goat by drawing permit only; however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years; the taking of nannies with kids is prohibited; or

Aug.10—Oct. 15  
(General hunt Only)

No open season.

1 goat by registration permit only; however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years; the taking of nannies with kids is prohibited; or

Aug.10—Oct. 15

No open season.

1 goat by registration permit only; however, if a nanny is either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years; the taking of nannies with kids is prohibited

Nov.1—Nov. 30

No open season.

Unit 15(C), that portion beginning; at the mouth of the Port Graham River, then southeast-

erly up the Port Graham River approximately 6 miles, then southerly up the south fork to the divide, then easterly across the divide to the main drainage that flows into Windy Bay, then southeasterly down the Creek to Windy Bay, then along the southern shore of Windy Bay, then westerly along the shore of the Gulf of Alaska and around the tip of the Kenai Peninsula and easterly to the point of origin

1 goat by registration permit only; however, if a nanny is either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years; the taking of nannies with kids is prohibited

Aug. 10–Oct. 15  
Nov. 1–Nov. 30

Aug. 10–Oct. 15  
No open season

Unit 7 and Remainder of Unit 15

Aug. 10–Oct. 15  
(General hunt only)  
Nov. 1–Nov. 30  
(General hunt only)

Aug. 10–Oct. 15  
Nov. 1–Nov. 30

1 goat by drawing permit only in the Aug. 10–Oct. 15 season (up to 500 permits will be issued), or 1 goat by registration permit only in the Nov. 1–Nov. 30 season; however, if a nanny is taken in either season, the hunter is prohibited from taking a goat on the Kenai Peninsula for 5 regulatory years; the taking of nannies with kids is prohibited

(4)

Unit 8, that portion of Kodiak Island south and west of a line extending along the Spiridon River, following the North Fork

of the Spiridon to its headwaters, then going southwest following the spine of the island over Koniag peak to the headwaters of the South Fork of Midway Creek, then downstream on Midway Creek to Midway Bay

2 goats by registration permit only, only 1 of which may be a billy; the taking of nannies with kids is prohibited

Aug. 20–Mar. 31  
General hunt only)

Aug. 20–Mar. 31

Unit 8, all lands enclosed by a Line beginning at the mouth of Kizhuyak Bay continuing southeast through Ouzinke Narrows and Narrow Strait, then south and west between Woody and Long islands, then southwest into Womens Bay to the mouth of Russian Creek, then southwest along Russian Creek to its watershed divide, then west to ‘Mountain 3100’ and following the ridgeline to ‘Mountain 3292’, then northeast to the headwaters of an unnamed stream west of Russian Creek headwaters; then northwest down the unnamed stream to its mouth at Kizhuyak Bay, then along the southwest shoreline of Kizhuyak Bay to Low Cape, then through the middle of Kizhuak Bay to its mouth

1 goat by registration permit only; by bow and arrow only; the taking of nannies with kids is prohibited; or

Nov. 1–Dec. 15

No open season

1 goat by registration permit only; by bow and arrow,

Dec. 16–Jan. 31

No open season

muzzleloader, or crossbow only;  
the taking of nannies with  
kids is prohibited  
Unit 8, all lands enclosed by  
a line beginning at the mouth  
of Ugak Bay continuing to the  
second unnamed stream west  
of Saltery Creek, then continuing  
north along that stream to the  
watershed divide, then connecting  
to the watershed divide of  
Russian Creek and following  
Russian Creek to its mouth at  
Womens Bay, then northeast  
through the middle of Womens  
Bay, then straight east through  
Chiniak Bay south of Refuge  
Island to the 3-mile limit, then  
following the 3-mile limit back  
to the mouth of Ugak Bay,  
including Ugak Island

1 goat by registration permit  
only; by bow and arrow only;  
the taking of nannies with kids  
is prohibited; or

Nov. 1–Dec. 15

No open season

1 goat by registration permit  
only; by bow and arrow only;  
the taking of nannies with kids  
is prohibited; or

Dec. 16–Jan. 31

No open season

1 goat by registration permit  
only; by bow and arrow,  
muzzleloader, or crossbow only;  
the taking of nannies with kids  
is prohibited

Dec. 16–Jan. 31

Dec. 16–Jan. 31

Remainder of Unit 8

1 goat by drawing permit  
only; up to 500 permits  
may be issued; the taking of  
nannies with kids is prohib-  
ited; or

Aug. 20–Oct. 25  
(General hunt only)

Aug. 20–Oct. 25

1 goat by registration permit only; the taking of nannies with kids is prohibited (7)	Nov. 1–Jan. 31	No open season
--	----------------	----------------

Unit 14C, the drainages of Eagle River, Bird Creek, Glacier Creek, and the East Fork of the Eklutna River

1 goat by drawing permit only; up to 150 permits may be issued; the taking of nannies with kids is prohibited;	Sept. 1–Oct. 15	Sept. 1–Oct. 15
--	-----------------	-----------------

Remainder of Unit 14(C)  
RESIDENT HUNTERS:

1 goat by registration permit only; however, goats may be taken from Aug. 16 through Aug. 31 by bow and arrow only; the taking of nannies with kids is prohibited	Aug. 16–Nov. 30 (General hunt only)	
---	--	--

NONRESIDENT HUNTERS:

1 goat by registration permit only; and by bow and arrow only; the taking of nannies with kids is prohibited; or		Aug. 16–Aug. 31
--	--	-----------------

1 goat by drawing permit only; the taking of nannies with kids is prohibited		Sept. 1–Oct. 15
--	--	-----------------

...

There is a positive customary and traditional use (C&T) finding for goats in units 6C, 6D, 7 and 15C outside of the Anchorage-Matsu-Kenai Nonsubsistence Area; there is a negative C&T finding in Unit 8. The board has determined the amounts reasonably necessary for goats are as follows: Units 6C and 6D 15-26 goats; Units 7 and 15C (outside of the NSA) 7-10 goats.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

If adopted, the proposal would encourage hunters to target only male mountain goats. Retaining adult females in the population could make goat populations more resilient, help populations

rebound after declines, and provide greater hunting opportunity in future years. The bag limit for southwest Kodiak Island (RG480) in Unit 8 is 2 goats total, only one of which may be a billy. This proposal will apply to the RG480 hunt as well, which is counter to the management needs for that population.

**BACKGROUND:** In 2009, the Board of Game (board) established a penalty for harvesting a nanny on the Kenai Peninsula (Units 7 and 15) in response to declining goat numbers. If a hunter harvests a nanny, the hunter is not allowed to hunt goats on the Kenai Peninsula for 5 years. With this penalty in place and the implementation of a new hunt structure, mountain goat populations have recovered to levels that allow for annual harvest in most hunt areas.

In the past 10 years, 18% of hunters prohibited from hunting mountain goats on the in Units 7 and 15 due to harvesting a nanny, have received a permit to hunt elsewhere in Region 2 (Units 6, 8, or 14C) during their penalty period. Since adoption of the same regulation for Unit 6 in 2015, 7% of hunters prohibited from hunting goats in Unit 6 due to harvesting a nanny, have received permits to hunt in Units 7, 8, 14C, or 15 during their penalty period. The ability for hunters to harvest a nanny in one portion of Region 2 and then hunt a different unit within the region degrades the effectiveness of the nanny penalty for the areas in which it currently applies.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal and is **OPPOSED** to it for the southwestern portion of Unit 8, where the 2-goat bag limit is in place to attract hunters to take advantage of the available resource. The department will continue to manage mountain goat populations sustainably while providing hunting opportunity. The department can close hunt units or alter guideline harvest levels based on mountain goat populations estimated during surveys and in-season harvest of nannies. 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 73 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.** Define the terms “permanent dwelling,” “publicly maintained trail/road,” and “developed recreational facility” in the Southcentral Region for the purpose of bear baiting.

**PROPOSED BY:** Caleb Martin

**WHAT WOULD THE PROPOSAL DO?** The proposal would define certain terms in 5 AAC 92.044 and reword one phrase, all applicable in the Units 6, 7, 8, 14C, and 15 only. It would reword the phrase “permanent dwelling” as "dwelling" and define it as a structure or part of a structure that is used as a home, residence, or sleeping unit that is publicly maintained through use of public funds or privately owned. This definition would include permitted trapper cabins.

It would define “publicly maintained trail or road” as a trail or road that is maintained with the use of public funding through an agency or private organization and meant for public use.

It would define “developed recreation facility” as an area that (A) includes a shooting range, developed boat ramp, campground, picnic area, rest area, visitor information center, swim beach, education center and/or developed ski area; and (B) does not include trails or latrines more than one quarter mile from a road.

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

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

...

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

...

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

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

AS 16.05.940(11) “domicile” means the true and permanent home of a person from which the person has no present intention of moving and to which the person intends to return whenever the person is away; domicile may be proved by presenting evidence acceptable to the boards of fisheries and game.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The adjective “permanent” in the current regulation modifies the word “dwelling” and there is no reference to period of occupancy or intent to return to the structure, and as currently written applies to seasonally occupied cabins. Removal of “permanent” and adoption of the proposed definition may serve to further limit bear baiting and present challenges for bear baiters who would now be in violation if a recreational tent was set up within a mile of a bait station.

The proposal would introduce confusion for hunters because the defined terms would only be applicable in Units 6, 7, 8, 14C, and 15.

**BACKGROUND:** The intent of the current regulations regarding bear baiting is to separate bear bait sites from other activities to prevent unanticipated human/bear interactions. The department does not have reliable, high-resolution data on the placement of bait stations relative to the structures listed in 5 AAC 92.044(b)(5), and it does not have high-resolution data on the existing dwellings, permanent or otherwise, and instead relies on law enforcement discretion to enforce these regulations.

The department is unaware of a formal definition of “publicly maintained trail or road” as these features have been created and maintained at various levels of jurisdiction including borough, state, federal, Native corporation, and private. The department does not catalogue these features across jurisdictions, and many are subject to frequent changes due to variable conditions, irregular maintenance, seasonality, etc.

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

(11) "developed facility"

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

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

The proposed definition removes “building” and includes “shooting range.” Such facilities have been created and maintained by various levels of jurisdiction and the department does not catalogue these facilities across jurisdictions and many are subject to frequent changes due to variable conditions, irregular maintenance, seasonality, etc.

At the March 2023 board meeting the board deferred Proposal 144 to the March 2025 Statewide board meeting. Proposal 144 asked to define “developed recreational facility” and “permanent dwelling” for the purposes of bear baiting in Units 7 and 15. At the March 2025 Statewide meeting, the board failed the proposal and also unanimously failed Proposal 124 which asked to change “permanent dwelling” to “permanent domicile” for the purposes of bear baiting, statewide.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on defining terms to reduce confusion and opposed to the regulatory complexity caused by defining terms within a unit or region only. If the board intends to change 5 AAC 92.044(5)(A)(B)(C), the department recommends deferring this proposal to the next regularly scheduled statewide board meeting.

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

\*\*\*\*\*

**PROPOSAL 74 – 5 AAC 92.130 Restrictions to Bag Limit.** Count a wounded brown bear against a hunter’s bag limit in Units 6, 7, 14C, and 15.

**PROPOSED BY:** Caleb Martin

**WHAT WOULD THE PROPOSAL DO?** Expand current regulations already in place for Units 1-5 and Unit 8 to include Units 6, 7, 14C, and 15, wherein a brown bear wounded by a person counts against that person’s bag limit for the regulatory year in which the bear is taken.

**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.

5 AAC 92.130(h), “wounded” means there is a sign of blood or there is sign that the animal has been hit by a hunting projectile.

There are negative customary and traditional use (C&T) findings for brown bear in units 6, 8, and 15C. Units 7, 14C, 15A, and 15B, excluding Kalgin Island, are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and there are no customary and traditional uses and the subsistence priority does not apply within the NSA. Kalgin Island in Unit 15B is outside of the NSA however there are no brown bears on the island.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Brown bears wounded and not recovered by a hunter in Units 6, 7, 14C, and 15 would count against that person’s bag limit for the regulatory year in which the bear is wounded. The proposal does not address areas with variable regulatory year bag limits (i.e. one bear every four regulatory years) as described in 5 AAC 92.130(f).

**BACKGROUND:** A similar regulation has been in effect since 2007 in Unit 8, and in portions of Southeast Alaska since 2005. The intent of the current regulation is to avoid the additive harvest of bears that may be caused by hunters either continuing to hunt, or taking additional bears, after they have wounded a bear. The existing regulation is intended to encourage hunters to make good shot placement, encourage taking game when conditions allow for retrieval, and to make every attempt possible to locate wounded game. The regulation is also used commonly in areas where there is limited hunting opportunity available, with the intent to spread opportunity to harvest evenly among those interested in participating.

The regulation that pertains to Units 1-5, and 8 also specifies bears wounded and not recovered count toward the bag limit for the regulatory year, but do not count toward the every four regulatory year bag limit.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the proposal and uses the number of permits, season dates and bag limits (which protect cubs and sows with cubs) to ensure that over-harvest of the populations does not occur. To reduce regulatory complexity, if the board adopts the proposal, the department recommends the board consider amending the proposal to match the existing Unit 8 regulation, which specifies wounded bears count toward the bag limit for the regulatory year, but not toward the every four regulatory year bag limit.

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

\*\*\*\*\*

**PROPOSAL 75 – 5 AAC 92.003. Hunter education and orientation requirements.** Require an online trapping education course for trapping in Units 6, 7, 8, 14C, and 15.

**PROPOSED BY:** Michael Knapp

**WHAT WOULD THE PROPOSAL DO?** Require trappers operating in Units 6, 7, 8, 14C, and 15 who were born after January 1, 1986, and are 18 years or older, to have successfully completed a basic trapper education course in person or on-line before trapping in the units listed above.

Trappers under 18 years of age must have either successfully completed the basic trapper education course in person or on-line, or be under the immediate supervision of a licensed trapper who: a) is 18 years of age or older and has successfully completed a basic trapper education course in person or on-line OR b) was born on or before January 1, 1986.

**WHAT ARE THE CURRENT REGULATIONS?** There are no current regulations requiring completion of a trapper education course.

Units 7, 14C, 15A, and 15B, excluding Kalgin Island, are located within the Anchorage-Matsu-Kenai Nonsubsistence Area and there are no customary and traditional uses and the subsistence priority does not apply within the NSA. There is a positive customary and traditional use finding for furbearers in Units 6, 8, and the remainder of Unit 15 for all units with a harvestable portion, with an amount reasonably necessary for subsistence of 90% of the harvestable surplus.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, the department would need to create and administer a trapper education course for users in the units listed that meet the described demographic criteria. Subsequently, over time, all trappers intending to trap in the described units would be required to take a trapper education course. The

proposal was written to mirror the existing hunter education requirement in Units 7, 13, 14, 15 and 20.

**BACKGROUND:** There are no current regulations requiring trappers to complete a trapper education course. The department uses quizzes, courses, and orientations to ensure hunters have a base of knowledge before pursuing certain animals or participating in certain hunts. Some of these requirements are for selecting a legal animal, while others orient the hunter to a specific hunt area. There are many examples of ways the department provides education for hunters before going afield. For example, during the 2025 statewide Board of Game (board) meeting, the board adopted proposals that require hunters statewide to pass a mountain goat quiz before hunting mountain goats and required all nonresident hunters to complete an orientation before hunting moose statewide.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal but supports the effort to reduce conflicts among outdoor recreators. It is unlikely there would be a resulting impact on trapper participation or success rates influencing furbearer populations. If this proposal is adopted, the department will need to work with local trappers and the Alaska Trappers Association to develop educational materials. If adopted, the department recommends the board delay implementation to give the department time to develop the materials. There are no other requirements for trapping education or orientation anywhere else in regulation, this would be the first and as such, the department will need substantial time to develop the materials. Additionally, 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 of furbearers if the proposal is adopted. The proposal was submitted to address Units 6, 7, 8, 13, 14, 14C, 15, and 20, however Units 13, 14A, 14B, and 20 are located outside of the area legally noticed for this meeting in the Southcentral Region and the board does not have the ability to make changes to those units at the March 2026 board meeting.

**COST ANALYSIS:** There would be a cost to the department for the development of the materials.

\*\*\*\*\*

**PROPOSAL 76 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Reduce the nonresident deer bag limit.

**PROPOSED BY:** Bradley Golden

**WHAT WOULD THE PROPOSAL DO?** Reduce nonresident bag limit from 4 deer to 1 deer.

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 6            August 1–December 31

Resident hunters

5 deer

Only bucks may be taken before October 1

Nonresident hunters

4 deer

Only bucks may be taken before October 1

There is a positive customary and traditional use finding for deer in Unit 6 with an ANS of 1,000–1,250 deer.

There is a positive intensive management finding for deer in Unit 6, with a population objective of 24,000–28,000 deer, and a harvest objective of 2,200 – 3,000.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** A nonresident hunter would not be able to harvest as many deer in a season. This reduction in harvest would be very small and unlikely to benefit the population, which is primarily affected by weather.

**BACKGROUND:** Sitka black-tailed deer in Unit 6 are at the extreme northern limit of their range (Cowan 1969). The population usually thrives because of mild, maritime climate conditions on islands in Prince William Sound (PWS) (Shishido 1986). The most important factors limiting the deer population are snow depth and snowpack duration (Reynolds 1979). A series of mild winters allows deer to increase and disperse to less favorable habitat, only to decline during severe winters when food is inaccessible. As such, weather primarily influences population trajectory.

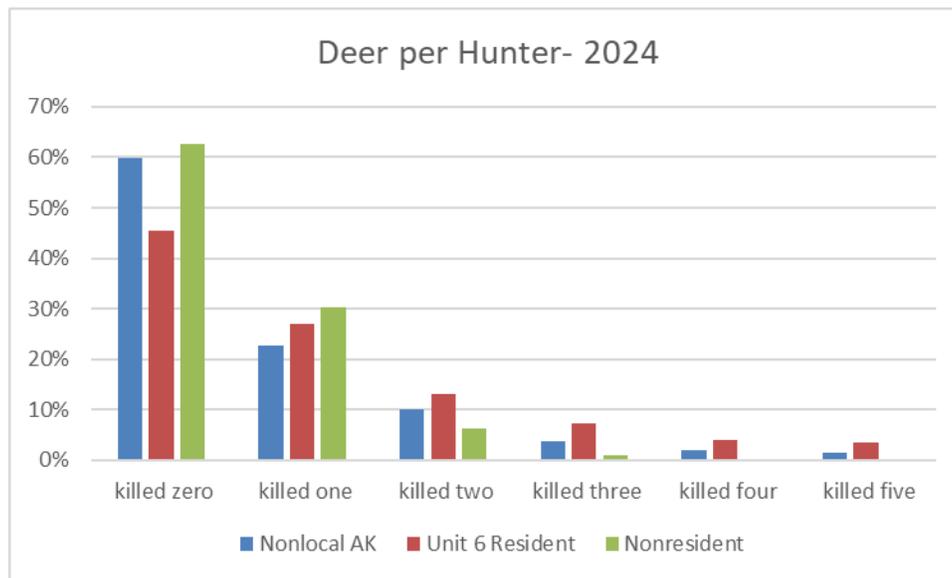
Generous season and bag limits allow for high harvest in years when winter kill is anticipated to be high. However, the remote nature of most of PWS, difficult fall weather, and rugged terrain

creates challenges for hunters which may limit participation and thereby lower harvest in most areas.

The average harvest for the last 10 years (regulatory years (RY) 15–RY24)) is 2,035 deer. The highest harvest during this time was 2,959 deer in RY21 which was followed by the lowest harvest, 1,499 deer, in RY22. For RY15-RY24, buck harvest was 57–69% of the total harvest with a ten-year average of 64%.

Nonresidents hunters averaged 0.57 deer per hunter during the same timeframe (RY15-RY14). Most nonresidents do not harvest more than one deer (Figure 1). A big game tag must be purchased prior to hunting and the cost for deer is \$300 per tag, and hunters may incur additional costs to transport meat home. A bag limit reduction would result in an average of 7 fewer deer being harvested per year and a loss of opportunity for nonresidents.

**Figure 1.** Unit 6 Deer harvested per hunter by residency type during RY24.



In some years, when weather concentrates deer on the beach, the number of deer taken per hunter increases substantially, but only among Unit 6 residents.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative components of this proposal and **OPPOSED** to the unnecessary reduction in opportunity. This proposal is not likely to have an impact on the population and does not create nor address a biological concern for the department.

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

\*\*\*\*\*

**PROPOSAL 77 – 5 AAC 85.040. Hunting seasons and bag limits for goat.** Change the nonresident goat hunt from a registration permit to a drawing permit.

**PROPOSED BY:** Bradley Golden

**WHAT WOULD THE PROPOSAL DO?** Change the registration goat hunt for nonresidents in Unit 6D to a drawing hunt. If adopted, this proposal will not change current mountain goat management strategies.

### **WHAT ARE THE CURRENT REGULATIONS?**

#### NONRESIDENT HUNTERS

Units 6C and 6D Sep 15–Jan 31

1 goat by registration permit only; however, if a nanny is taken, the hunter is prohibited from taking a goat in Unit 6 for 5 regulatory years; the taking of nannies with kids is prohibited.

There is a positive customary and traditional use finding for goat in Units 6C and 6D outside of the Valdez non-subsistence area (RG245 and RG248) and an amounts reasonably necessary for subsistence of 15 – 26 goats.

### **WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?**

Nonresident hunters would have the full length of the season to harvest a goat rather than the risk that the season might close early when the Maximum Allowable Harvest (MAH) is met.

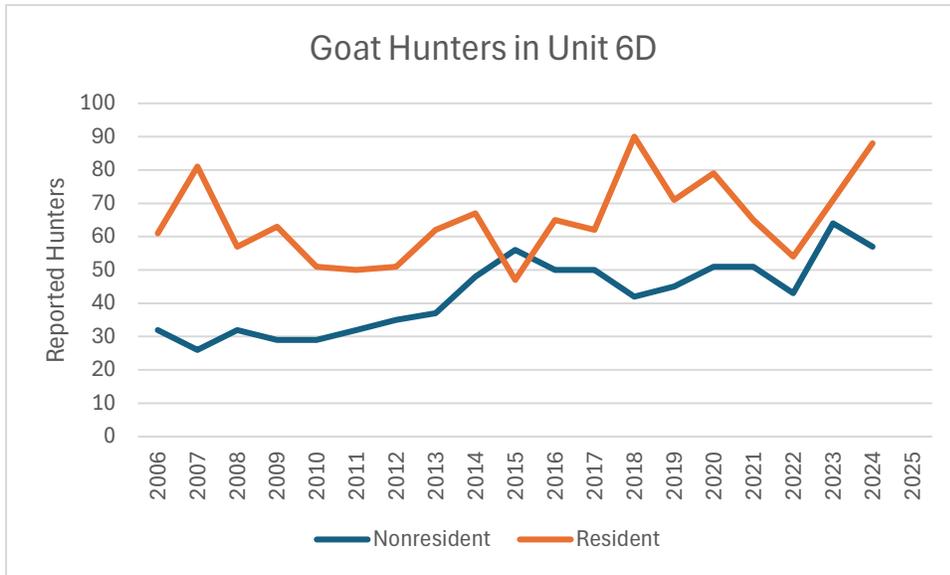
However, they would have to draw a permit through the drawing lottery for the opportunity to hunt. Drawing hunts could prevent exceeding MAH in some areas or leaving quotas unfilled by trying to anticipate harvest with in-season management.

**BACKGROUND:** There are 8 hunt areas in Unit 6D (RG242–266.) These hunts are managed based on minimum count aerial surveys and a 3–5% harvest rate. Harvest is considered in “goat points” with billies counting as 1 point and nannies counting as 2. If a nanny is harvested, the hunter (resident or nonresident) cannot hunt in Unit 6 for 5 years. As with all goat hunting in Alaska, completion of the Mountain Goat Orientation and Quiz is now mandatory for all hunters prior to hunting.

Minimum count aerial goat surveys are performed annually but are notoriously difficult to complete due to weather, pilot availability and the highly specific conditions required. While the goal is to survey each hunt area every 3-5 years, it is often longer between surveys. Stable trends characterize most areas for the last 20 years.

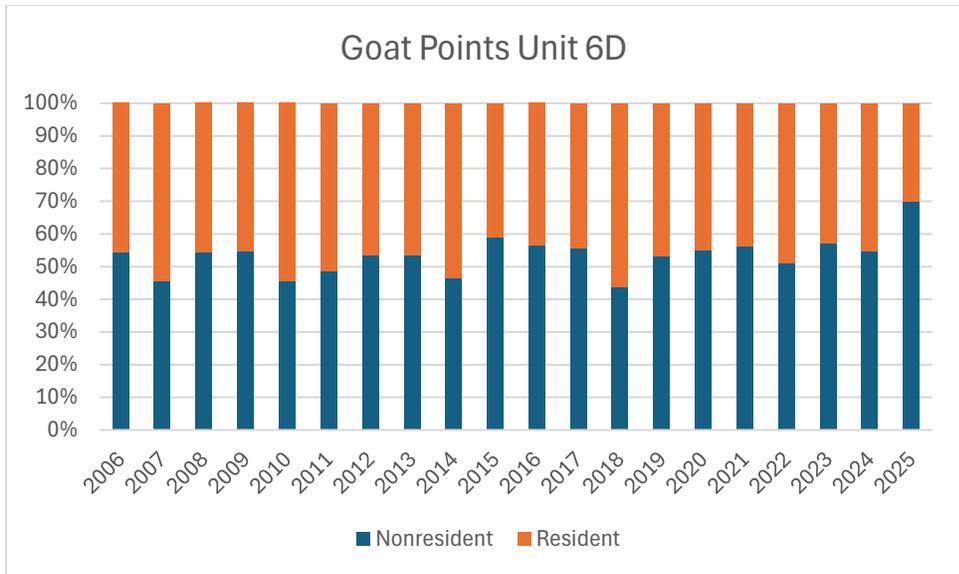
The number of hunters pursuing goats has increased over the last 20 years from a low of 82 hunters in RY10 and RY11 to a high of 141 hunters in 2024. In Unit 6D, the 10-year average number of nonresident hunters for RY06–15 was 36 hunters and grew to 50 hunters for RY16–

24 (Figure 1). The number of resident hunters also grew from a 10-year average of 59 for RY06–15 to 72 in RY16–24. If only the 3 most popular hunt areas (RG249, RG252 and RG266) are considered, the number of nonresident and resident hunters is nearly identical and has increased at the same rate. These 3 hunts are the most popular with residents because they are closest to the ports of Whittier, Valdez, and Seward and lend themselves to self-supported hunters. For the last 10 years, an average of 7% of nonresident hunters did not report using a guide and it is inferred that these hunters are guided by a resident relative within second degree of kindred.



**Figure 1.** Goat Hunters in Unit 6D 2006–2025.

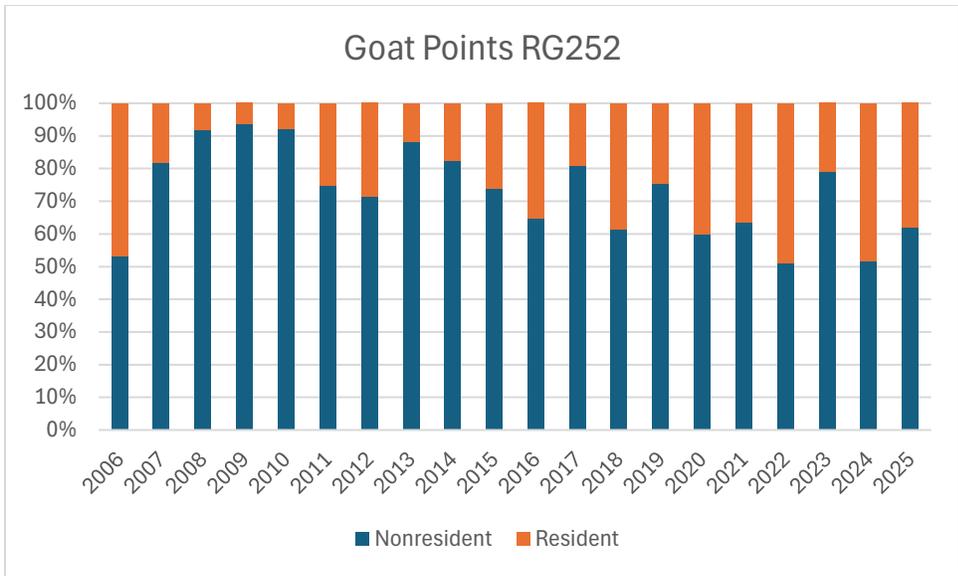
Harvest during the last 10 years, considered in goat points, has been increased in response to increased abundance of goats which provides for additional harvest opportunity (Figure 2). In RG252, in 8 of the last 10 years, more than 60% of goat points were taken by nonresidents (range 51–81%). In RG249, in 7 of the last 10 years, more than 60% of goat points were taken by nonresidents (range 35–79%). In RG266, in 4 of the last 10 years, more than 60% of goat points were taken by nonresidents (range 17–89%.) Combined harvest by goat points for Unit 6D is more than 50% nonresident.



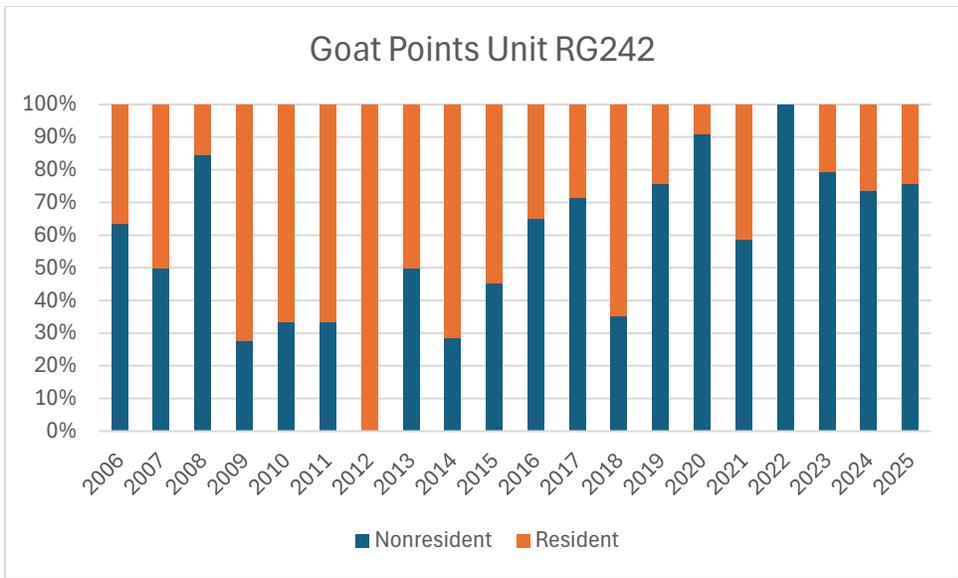
**Figure 2.** Maximum allowable harvest for goats in Unit 6D

The season is closed by emergency order when the maximum allowable harvest has been met or is anticipated to be met very soon. Some hunt areas in Unit 6D (RG242, RG243, and RG244) are rarely closed. RG245 remained open 9 of the last 20 years. The 3 most popular hunt areas, RG249, RG252, and RG266, usually close within 30 days. The cumulative number of days available to hunters in Unit 6D has declined from 658 days (5-year average RY06–10) to 533 (5-year average RY21–25).

The US Forest Service authorizes commercial operators on USFS land. Their numbers are updated every 5–10 years and do not consider goats available for harvest. As a result, effort shifts as seasons close while hunters that are hunting with contracted guides are still in the field. Some guides have addressed increasing pressure by shifting effort away from more popular areas (RG252, Figure 3) into areas with less pressure (RG242, Figure 4).



**Figure 3.** Maximum allowable harvest for goats in RG252



**Figure 4.** Maximum allowable harvest for goats in RG242

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocative aspects of this proposal. With shorter seasons and more hunters afield, it is becoming more difficult to stay within the MAH.

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

\*\*\*\*\*

**PROPOSAL 78 – 5 AAC 85.040. Hunting seasons and bag limits for goat.** Create an archery only registration permit in a portion of Unit 6.

**PROPOSED BY:** Jesse Dunshie

**WHAT WOULD THE PROPOSAL DO?** Create a fall season, archery registration permit goat hunt within RG248 hunt area in Unit 6D, with a season of September 10 – 20, and a bag limit of 1 billy. The proposal does not specify if the hunt will be open to residents and nonresidents.

**WHAT ARE THE CURRENT REGULATIONS?**

RESIDENT AND NONRESIDENT HUNTERS

Units 6C and 6D Sep 15–Jan 31 (the season runs Oct 1–Oct 31 using permit hunt conditions)

1 goat by registration permit only; however, if a nanny is taken, the hunter is prohibited from taking a goat in Unit 6 for 5 regulatory years; the taking of nannies with kids is prohibited.

There is a positive customary and traditional use finding for goats in Units 6C and 6D outside of the Valdez non-subsistence area (RG245 and RG248) and an amount reasonably necessary for subsistence of 15 – 26 goats.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would create an exclusive hunting opportunity for archery hunters. This proposal would not likely impact the goat population because the department will continue to manage within Maximum Allowable Harvest (MAH) through available goat points. Archery hunters would have additional early season opportunity compared to non-archery hunters. With a shared quota, non-archery hunters would potentially have a shorter season as they pursue a smaller quota.

**BACKGROUND:** Goats are the only native ungulate in Unit 6 and have long been hunted. In 1998, the board established the current hunt areas in Unit 6 to allow for more precise and responsive hunt management. Registration hunts in Unit 6 are managed by emergency order when MAH levels are reached. Over the last 6 years (regulatory years (RY)19–24)), this hunt has not closed by emergency order, and the season has been expanded from 10 days to 31 days.

This hunt has occurred in 16 of 27 years (since 1998) with 5–6 goat points available when a hunt occurred, except the last 2 years when 8 goat points were available. RG248 was not offered as a hunt until RY05. From RY05–09, the hunt occurred but lasted 1–5 days before closing by emergency order. RG248 was not offered RY10–12 due to insufficient population survey data combined with disproportionately high hunter interest for a very small MAH, thereby increasing the likelihood of drastically exceeding MAH in even an extremely short season.

In RY13, aerial surveys were conducted that found sufficient goats to support the hunt. However, interest was still very high and led to seasons of less than 2 days. The board of game (board) implemented a series of changes to ensure a more regulated harvest. In 2014, the Mountain Goat Identification quiz became mandatory for goat hunters in specific areas, including RG231. Additionally, in 2015, the board passed a regulation prohibiting mountain goat hunting in Unit 6 for 5 years after harvesting a nanny. Since RY16, the department has issued a limited number of permits, available in-person only. As a result, the season has gradually lengthened and permit availability has increased.

Considering the last 10 years, an average of 11 hunters per year participate and an average of 4 goats were harvested annually. When weighted to consider nanny take, an average of 5 goat points have been taken each year. None of the harvest records in RG248 since 2005 have indicated that archery was the utilized method of take. Nearly all harvest (96%) is by Alaska residents.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal due to its allocative nature. If the board adopts the proposal, it will need to specify if the hunt is open to resident and nonresidents. Portions of the RG248 hunt area are outside of the nonsubsistence area. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for the subsistence taking of goats if the proposal is adopted.

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

\*\*\*\*\*

**PROPOSAL 79 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Shorten the nonresident moose hunting season in Unit 6A.

**PROPOSED BY:** Jason Semler

**WHAT WOULD THE PROPOSAL DO?** Shorten the nonresident moose season in Unit 6A by one month.

**WHAT ARE THE CURRENT REGULATIONS?**

**NONRESIDENT HUNTERS**

Units 6A remainder Sept. 1 – Nov. 30

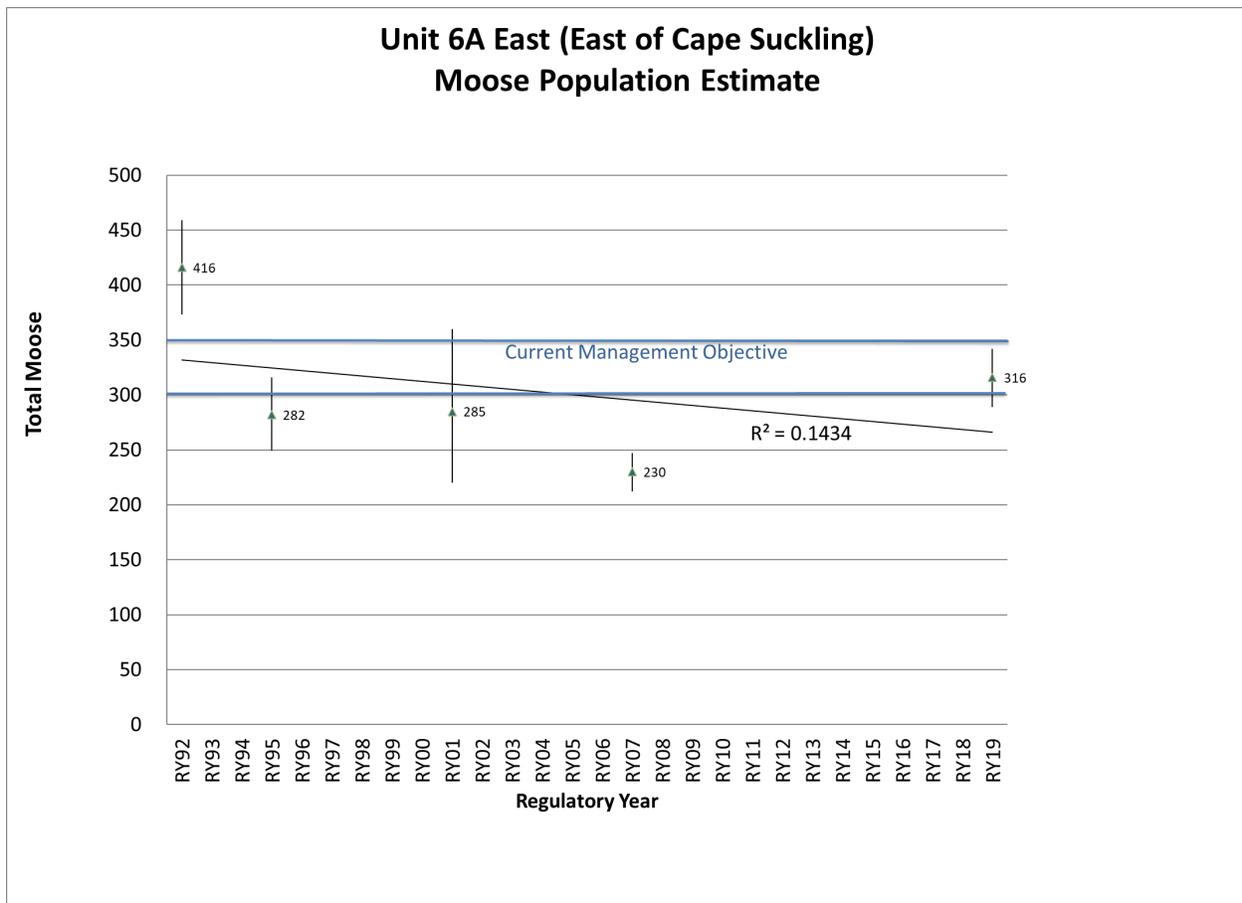
1 Bull with 50-inch antlers or antlers with 3 or more brow tines on at least 1 side.

There is a negative customary and traditional use finding for moose in Unit 6.

There is a negative intensive management finding for moose in Unit 6.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The nonresident season for moose would be reduced by one month in Unit 6A. The department does not anticipate a significant decline in harvest as most moose are taken early in the season.

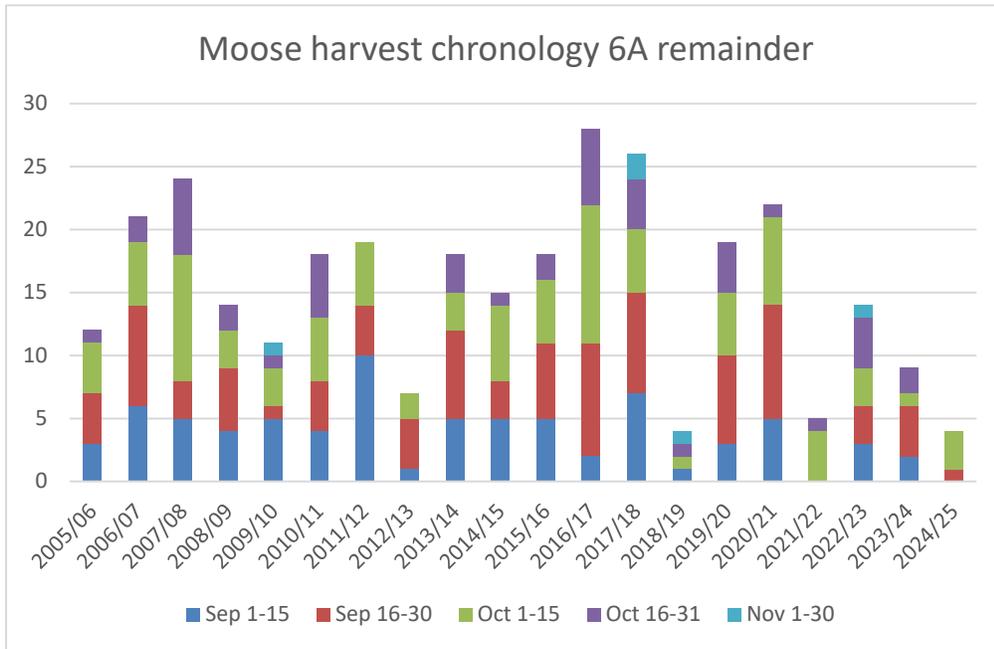
**BACKGROUND:** The most recent point estimate for Unit 6A East, Cape Suckling to Icy Bay, was 316 moose in RY19 (90% CI 289–342) (Figure 1.) The previous point estimate was from RY07; with 12 years between population estimates, it is impossible to speculate on population trajectory. Additionally, RY19 was the first year that the area from Cape Yakataga to Icy Bay had been included in the population estimate. Had this not been included, the estimate would have been very close to past estimates of about 275–285 moose. Prior to RY19, this population had not been within the management objective of 300–350 for at least 25 years. While the population is now within range, it is important to remember that this is mostly due to the inclusion of the additional area. The level of calves observed (13%) increased compared to the last surveys (RY07 7% calves, RY09 11% calves.)



**Figure 1.** Moose population estimate for Unit 6A East

Although the population trajectory for moose in Unit 6A remainder is unclear, the hunt management structure for this area makes overharvest unlikely. A 5-year annual average of 32 hunters resulted in a 5-year average annual harvest of 11 moose (range 4–22). Success rates are 23–48% and are largely influenced by the fact that most hunters (>80%) report using a guide to hunt in this area.

In most years, more moose are taken in September than in the remaining months of the season (Figure 2). Harvest in November has only been reported in 4 of the last 20 years. If November harvest are excluded, 0–2 fewer moose would have been harvested each year for a total reduction of 5 moose over the last 20 years.



**Figure 2.** Moose harvest chronology for Unit 6A remainder.

Members of the public have expressed some concern that late season hunts affect moose negatively because bulls are in poor, post-rut body condition. However, with low participation during the late season, it is unlikely that legal moose hunting would have a biological impact.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal because it is allocative, and the department is opposed to unnecessary reductions in opportunity.

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

\*\*\*\*\*

**PROPOSAL 80 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Create a drawing hunt for moose in Unit 6D.

**PROPOSED BY:** Joseph List

**WHAT WOULD THE PROPOSAL DO?** The proposal would create 2 new hunt areas, as follows:

Archery-Only Zone: From Valdez (milepost 0) to milepost 12 on the Richardson Highway and only within 100 yards on either side of the highway right-of-way.

Any-Weapon Zone: From milepost 12 to milepost 25 on the Richardson Highway and only within 100 yards on either side of the highway right-of-way.

Each hunt area would have a drawing hunt for a bull or cow without a calf.

Season Dates: October 1 to February 28

**WHAT ARE THE CURRENT REGULATIONS?**

Unit 6(D)

1 bull	Residents or Nonresidents	Sept. 1 – Sept. 30
--------	---------------------------	--------------------

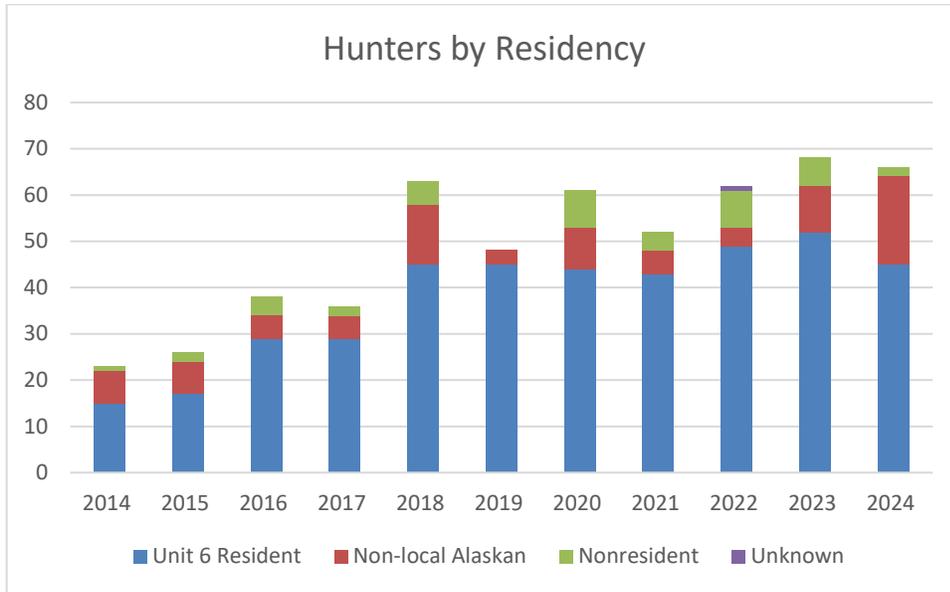
This portion of Unit 6 is located entirely within the Valdez Nonsubsistence Area (NSA), therefore there are no customary and traditional use findings for moose in this area. Outside of the NSA, the board has made a negative customary and traditional use finding for moose in Unit 6.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would create a new moose archery season intended to mitigate moose/vehicle collisions on portions of the Richardson Highway.

**BACKGROUND:** Unit 6D is not considered to have a resident moose population. Nearly all of the moose that area found in Unit 6D occur between Valdez and the boundary of 13D in Thompson Pass. During normal to severe winters, snow depths are believed to limit moose enough to either drive them from the area or kill them. In mild winters moose may remain, but these periods are usually not sustained for numerous consecutive years. Due to this ephemeral nature and what is believed to be a small population, moose in Unit 6D have not been surveyed.

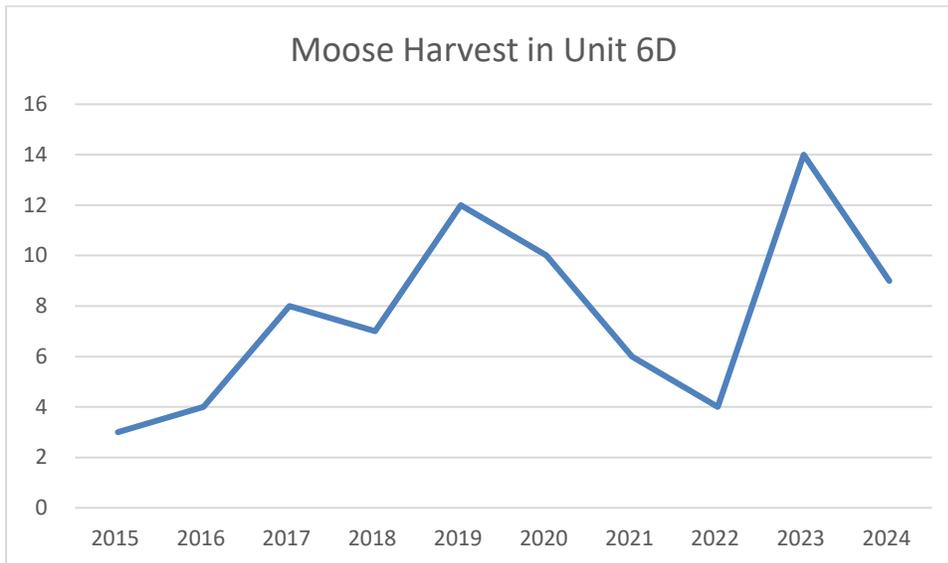
The current structure of the hunt is believed to provide for the compensatory harvest of bulls, however if winters are mild enough for cows to survive and persist, they are given the chance to do so. Winter moose mortality is believed to be biased towards males and calves because they enter the winter in the poorest body condition.

Interest in hunting moose in this area has grown from about 20 hunters to 60 hunters per year in ten years (Figure 1). Most of the hunters that participate are residents of Valdez. Hunter success varies by year from 6–25%. Hunters reported an average of 5–7 days hunted.



**Figure 1.** Unit 6D moose hunter residency.

Moose harvest has increased from 3 moose in 2015 to a high of 14 moose in 2023. However, harvest has varied greatly from year to year, probably due to moose abundance and distribution.



**Figure 2.** Moose harvest in Unit 6D.

This proposal would allow for a longer season and a bag limit that would include cows, but in a small roadway corridor. This could result in higher harvest in this area, potentially exceeding the

current level of roadkills. Roadkill reporting for moose is imperfect. Two moose were reported in 2023 and none for all other years. Anecdotally, it is believed that 0–3 moose are involved in vehicle collisions per year.

This proposal would create an exclusive hunting opportunity for archery hunters. Functionally this is not necessary since the City of Valdez regulates the use of firearms and would restrict opportunity to hunting equipment that adheres to their ordinances and local regulations. Additionally, without a population estimate or the ability to anticipate winter conditions, it would be nearly impossible to determine an appropriate harvest amount.

A targeted hunt would allow for a to-be-announced (TBA) season in response to conditions that could lead to high winter mortality and or/ vehicle collisions, although there is no evidence that the small amount of roadkill necessitates an additional hunt.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative nature of the proposal. The department **OPPOSES** replacing the current harvest ticket hunt with a drawing hunt because it is an unnecessary reduction in opportunity. The board will need to determine if it wants to replace the existing hunt, or add this to the existing structure. Also, if the board is interested in adopting the proposal, the department recommends the board change February 28 to “the last day of February” to be consistent with other regulations and to address leap years.

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

\*\*\*\*\*

**PROPOSAL 81 – 5 AAC 085.045(a)(4) Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 6C.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** Adoption of this proposal would ensure that the department has the necessary tools to manage the Unit 6C moose population within objectives.

**WHAT ARE THE CURRENT REGULATIONS?**

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
...		
Unit 6(C)	Sept. 1–Oct. 31 (General hunt only)	No open season
1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued		
1 moose by registration permit only	Nov. 1–Dec. 31	No open season
...		

The board has made a negative customary and traditional use finding for moose in all of Unit 6.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal reauthorizes antlerless hunts in Unit 6C as required by statute. Resident hunters would be able to continue to harvest antlerless moose during hunts administered by ADF&G on state-managed lands in Unit 6.

**BACKGROUND:** Antlerless moose seasons must be reauthorized annually. The Unit 6C moose population objective is 600–800 moose. A population survey completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. This population is aggressively harvested to remain within population objectives. ADF&G manages this hunt cooperatively with the U.S. Forest Service and the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season. The state antlerless hunt has not been held since the 1999–2000 season. In 2013, a registration hunt was established that could be used to harvest moose, including antlerless moose, if the federal subsistence hunt is not held or it does not result in the desired amount of harvest. At this time, quotas have been adjusted on both the federal and state side to bring the population to within its objectives. Continuation of the antlerless hunts is necessary to achieve population objectives.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal to reauthorize antlerless moose harvest in Unit 6.

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

\*\*\*\*\*

**PROPOSAL 82 – 5 AAC 85.015(a)(2). Hunting seasons and bag limits for black bear.**

Shorten the RL065 spring black bear season in Unit 6D.

**PROPOSED BY:** Copper River /Prince William Sound Fish and Game Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** Shorten the spring hunting season for black bear in Unit 6D (RL065) by 10 days.

**WHAT ARE THE CURRENT REGULATIONS?**

Residents and nonresidents:

Unit 6(D)

1 bear by registration permit only

Sept. 10 – June 10

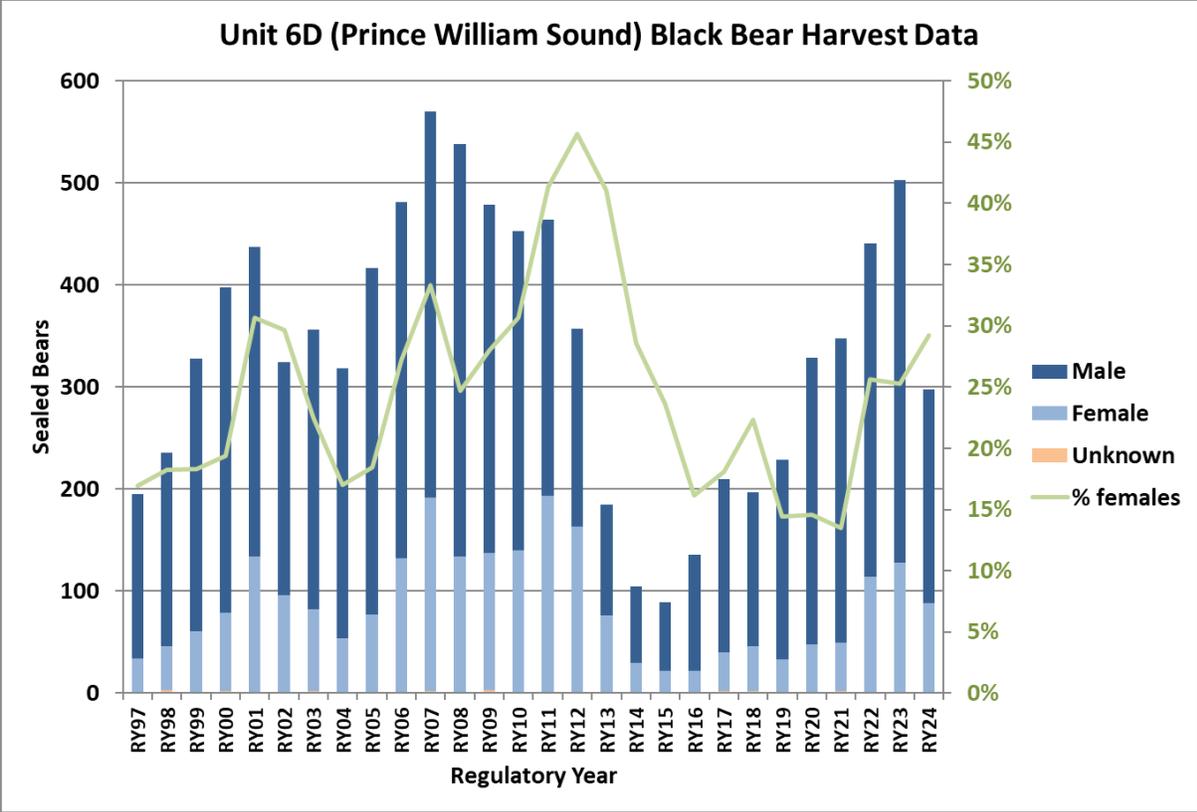
There is a positive customary and traditional use finding for black bears in Unit 6 with an amount reasonably necessary for subsistence of 80-120 bears.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The black bear season will be 10 days shorter for both residents and nonresidents. Since RY15, about 20% of the harvest occurs in the first 10 days of June. Removing this period may reduce harvest by about 50 bears per year, or effort may shift with the change in season dates and harvest may remain at similar levels. Spring snow conditions have an impact on the overall contribution of this timeframe to the total harvest in any given year. If the harvest is high or growing, a shorter season could reduce harvest pressure. If harvest is low or steady, a shorter season could result in missed harvest opportunity.

**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.

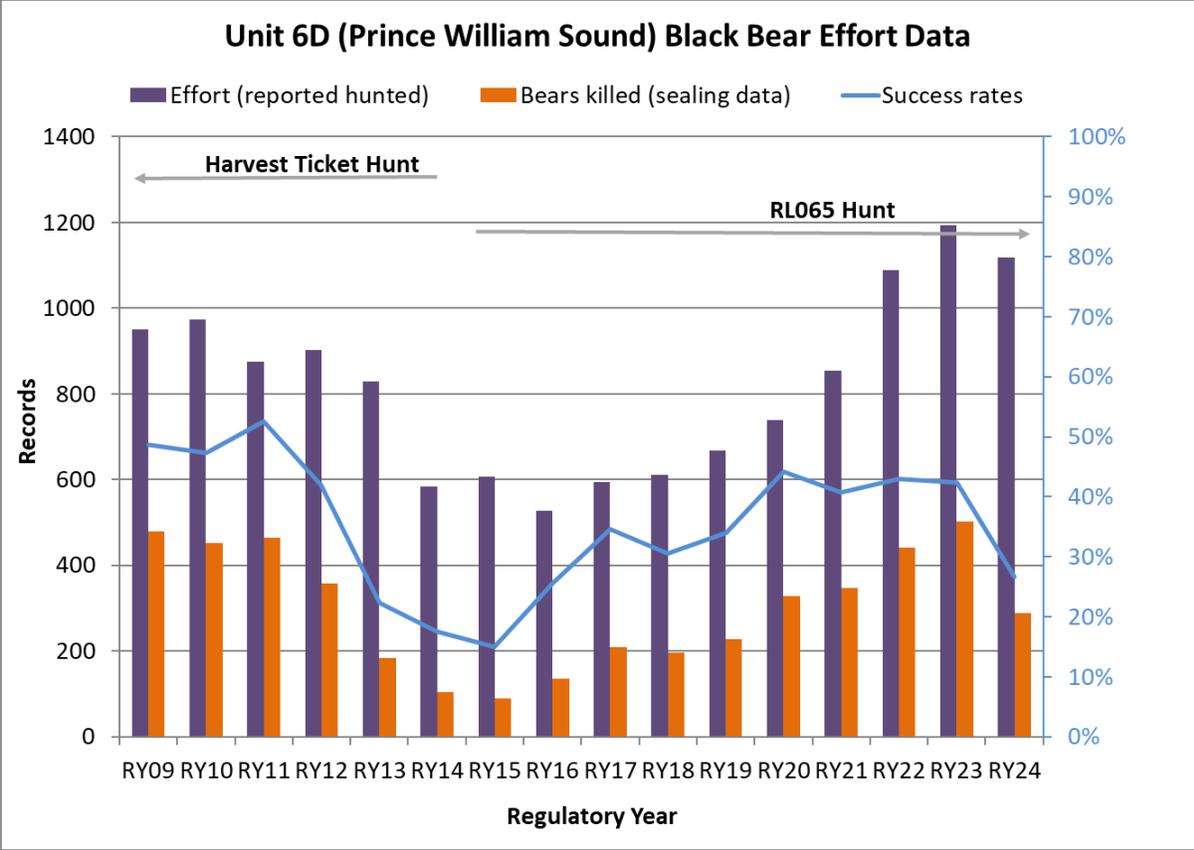
Black bears are notoriously difficult and expensive to enumerate. Harvest data is currently the only tool for trying to understand population status and trajectory. All black bears harvested in Unit 6 must be sealed within 30 days of harvest. Annual harvest has ranged from a high of 570 bears in RY07 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, respectively). 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.

Spring snow and weather conditions may impact the proportion of bears in the harvest during June. For example, in RY11 and RY12, more than 35% of the harvest occurred in June because late snow concentrated bears into smaller areas. As the season progresses, male bears may become increasingly focused on breeding females. Highly active bears are likely easier to hunt as they are engaged in less resting and feeding behavior.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to the unnecessary reduction in opportunity. Moderating dramatic highs and lows in harvest can increase 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 are avoided unless there is a clear biological necessity. 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 85 – 5 AAC 92.085. (9) Unlawful methods of taking big game; exceptions.**

Prohibit the take of big game from a boat in Unit 6 without a permit.

**PROPOSED BY:** Bradley Golden

**WHAT WOULD THE PROPOSAL DO?** Restrict hunters from shooting big game from a boat in Unit 6 without a permit.

**WHAT ARE THE CURRENT REGULATIONS?**

5 AAC 92.085, The following methods and means of taking big game are prohibited:

(9) from a boat in Units 1–5; however, a person with physical disabilities, as defined in AS 16.05.940, may hunt from a boat under authority of a permit issued by the department;

...

(12) shooting black bear from a boat in Unit 6(D); however, a person with physical disabilities, as defined in AS 16.05.940, may hunt from a boat under authority of a permit issued by the department;

There is a positive customary and traditional use (C&T) finding for black bear in Unit 6, and an amount reasonably necessary for subsistence (ANS) of 80–120 bears. There is a positive C&T finding for deer in Unit 6 with an ANS of 1,000–1,250 deer. There is a negative C&T finding for moose in **Unit 6**.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Modifying this regulation would require hunters in Unit 6 to exit their boat before shooting unless they had a permit providing an exemption. Under current general hunting regulations, a person may not take game from a motor-driven boat or motorized land vehicle, unless the motor has been shut off and the progress from the motor’s power has ceased, or under the authority of a permit issued by the department.

This proposal has the potential to reduce opportunity for deer harvest, particularly in deep snow conditions when deer tend to congregate on beaches and most hunting is boat-based. The proposal also has the potential to reduce opportunity for other big game species, but it is unknown how many are currently taken from a boat.

Prohibiting shooting from a boat could reduce wounding loss, however there is no system for tracking and documenting wounding loss. There are also anecdotal reports of hunters shooting before forward progress has stopped and this may alleviate some reports of public safety concerns or violations.

**BACKGROUND:** Beginning with regulatory year (RY) 2003, hunting black bears from a boat became illegal in Prince William Sound (Unit 6D). The department was neutral on proposal 19 in 2003 stating:

...Although we have no supportive data, we suspect that bear wounding loss resulting from shooting from boats is substantially higher than when shooting from solid ground. This regulation would also provide a safer environment for other hunters, sport fisherman, campers and non-hunting wildlife viewers, some of whom perceive a threat to their safety by errant bullets and wounded bears resulting from hunters shooting from boats.

Winters with early, deep snow (RY11 and RY21) have resulted in high deer harvest. Harvest in the month of December went up dramatically in those years. It is impossible to know how many of those hunters were shooting from a boat but anecdotal reports suggest a high proportion. Harvest reporting only captures the method of transportation to the hunt area and not specifically if a vehicle or form of transport was in use at the time of harvest.

Sitka black-tailed deer in Unit 6D are at the most northern extent of their current range. With deep snow, winter deer mortality can be high. Much, but not all, of the deer harvest is thought to be compensatory rather than additive as many deer die naturally during deep snow winters. There is no biological concern in Unit 6 at the current levels of deer harvest. Moose hunting on inland waters of Unit 6 often involves a jet boat or airboat to access hunting areas. There is no biological concern in Unit 6 at the current levels of moose harvest.

Currently, a person with physical disabilities may obtain a permit to shoot big game from a boat in Units 1-5, or black bear from a boat in Unit 6D. Permit holders may only shoot from a boat when the motor is turned off and when progress from the motor has ceased. Applications are available at the ADF&G offices nearest the hunt area and permit applications for Unit 6 are received and issued each year. Although permits can be issued, it creates an additional requirement for hunters prior to going into the field including obtaining proof of a physical disability prior to applying for the permit.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this methods and means proposal and in general supportive of measures to reduce wounding loss and promote safe hunting practices. 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 91 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose in Unit 15.**  
 Shift the moose season later and change the dates for the 15C motorized restriction to later in the season.

**PROPOSED BY:** Arnold Mason

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the dates for the current Unit 15 general harvest moose season to Oct. 1 – Oct. 25 and adjust the motorized closed restriction in 15C accordingly.

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

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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	Sept. 1—Sept. 25	No open season

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

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 7, that portion west of the Resurrection Creek Trail and north of the Sterling Highway; or

Oct. 10—Nov. 10  
(General hunt only)

Oct. 10—Nov. 10

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 3 or more brow tines on one side; or	Sept. 1—Sept. 25 (General hunt only)	Sept. 1—Sept. 25
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 and traditional use finding for moose in Unit 15B (Kalgin Island) and an amount reasonably necessary for subsistence (ANS) of 2 moose.

In Unit 15C, that portion southwest of a line from Point Pogibshi to the point of land between Rocky Bay and Windy Bay, there is a positive customary and traditional use finding for moose and an ANS of 5–6 moose.

The remainder of Unit 15 is located within the Anchorage-Matsu-Kenai Nonsubsistence Area; therefore, there are no customary and traditional uses of moose in the area.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would shift the Unit 15 general moose season one month later to October 1 – October 25. Later season dates would coincide with rut timing which may lead to unsustainably higher harvest rates and/or interference with breeding behaviors.

**BACKGROUND:** The current Unit 15 moose season dates are set so that the majority of the hunting season occurs before the rut. Shifting the season to October would move the season into the rut. Vulnerability of bulls to harvest would significantly increase by changing to these season dates and interference with rutting activity could impact breeding success.

**DEPARTMENT COMMENTS:** The department is **OPPOSED** to this proposal. Current seasons dates avoid the rut to ensure long term sustainable harvest opportunity. Should the board adopt this proposal the department asks that the same season dates be applied to Unit 7 to keep regulations standardized across the Kenai Peninsula.

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

\*\*\*\*\*

**PROPOSAL 92 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose in Unit 15.** Align the moose hunting season on Kalgin Island in Unit 15B with the rest of the Unit 15B moose seasons.

**PROPOSED BY:** Homer Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the dates for the current Unit 15(B) Kalgin Island registration moose season from Aug. 20–Sept. 20 to Sept. 1–Sept. 25.

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

5 AAC 85.045(13) are:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
Unit 15(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 20	Aug. 20—Sept. 20

...

The Alaska Board of Game (board) has made a positive customary and traditional use finding for moose in Unit 15B (Kalgin Island) and has determined an amount reasonably necessary for subsistence of 2 moose.

There is a negative intensive management finding for moose in Unit 15B.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal would create new season dates for Unit 15(B) Kalgin Island moose season of Sept. 1-Sept. 25. This would shorten the season by 7 days and could decrease resident and nonresident harvest on a moose population that is currently 3-4 times above objective population numbers.

**BACKGROUND:** The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest any moose with the goal of reducing the population to the management objective of 20-40 moose across the island.

In response to concerns that the moose population on Kalgin Island had exceeded the island's carrying capacity and habitat conditions were deteriorating, the board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective.

During the most recent moose survey in November 2024, department staff counted 103 moose on Kalgin Island. In the last 5 years, an average of 107 permits were issued for this hunt; 74 permittees hunted, yielding an average annual harvest of 23 moose. Harvest rate is correlated to hunter effort and success rate has remained high with a 5-year average of 31%. The majority of the harvest in the last 5 years (69%) has occurred during the first 10 days of the season (August 20–29).

The current Kalgin Island moose season (Aug. 20-Sep. 20) is very similar in timing and length to the moose season in the rest of Unit 15B, opening 2 days before the bow season (Aug. 22) and ending 5 days sooner than the general season (Sept. 25). Decreasing the season length could lead to a decrease in moose harvest, contrary to the department’s objectives in this area.

**DEPARTMENT COMMENTS:** The department **OPPOSES** this proposal due to reduction in hunting opportunity for a population that is currently 3-4 times higher than its objective. 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 95 – 5 AAC 85.045(a)(13) Hunting seasons and bag limits for moose.**  
 Reauthorize the antlerless moose season on Kalgin Island in Unit 15B.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal would reauthorize the antlerless moose hunt for Kalgin Island in Unit 15B.

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

**85.045** are:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		
...		
Unit 15(B), Kalgin Island 1 moose per regulatory year, by registration permit only	Aug. 20–Sept. 20	Aug. 20–Sept. 20

There is a positive customary and traditional use finding for moose in Unit 15B (Kalgin Island) with ANS of 2 moose.

There is a negative intensive management finding for moose in Unit 15B.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The antlerless moose season for Kalgin Island (RM572) in Unit 15B would be reauthorized. This hunt will help to maintain moose populations within sustainable levels on Kalgin Island, provide subsistence opportunity, maximize other harvest opportunity, and decrease the chance of high winterkill due to a lack of suitable forage.

**BACKGROUND:** Antlerless moose hunts must be reauthorized annually by the board. The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective of 20-40 moose.

In response to concerns that the moose population on Kalgin Island had exceeded the island's carrying capacity and habitat conditions were deteriorating, the board established a drawing permit hunt for antlerless moose in 1995. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective. Antlerless hunts, such as RM572, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat.

During the most recent moose survey (November 2024), department staff counted 103 moose on Kalgin Island. In the last 5 years, an average of 107 permits were issued for this hunt, of which 74 permittees hunted, yielding an average annual harvest of 23 moose. Harvest tracks with hunter effort and the success rate has remained high with a 5-year average of 31%.

The "any moose" registration hunt is recommended to reduce moose numbers on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access likely minimize the danger of overharvest. Additionally, if needed, the department can manage this permit hunt in-season, allowing for a change in the number of permits provided or closure of the hunt.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. This hunt helps to control the moose population on Kalgin Island to keep it within sustainable limits and provides additional harvest opportunity.

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

\*\*\*\*\*

**PROPOSAL 96 – 5 AAC 85.045(a)(13) Hunting seasons and bag limits for moose.**

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

This proposal would reauthorize the antlerless moose hunt in 15C (DM549) and the targeted hunt (AM550).

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal would reauthorize the antlerless moose hunt DM549 and the targeted antlerless hunt AM550 in Unit 15C.

**WHAT ARE THE CURRENT REGULATIONS?** The current regulations as defined in **85.045** are:

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

(13)

...

Unit 15(C), that portion from the mouth of Deep Creek easterly along the south bank of Deep Creek to N 59° 55.183', W 151° 8.155'; then southeasterly in a straight line to the unnamed creek at N 59° 54.342', W 151° 6.459'; and easterly down the south bank of this stream to Caribou Lake and easterly along the south shore to the outlet of Fox Creek, then south along the west bank of Fox Creek to the mouth of Fox Creek, and along the mean high tide line to the point of origin

**RESIDENT HUNTERS:**

...

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

Oct. 20—Nov. 20

...

1 moose by targeted permit only,

Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

...

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

Oct. 20—Nov. 20

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only,

Oct. 15—Mar. 31

This portion of Unit 15C is located entirely within the Anchorage-Matsu-Kenai Nonsubsistence Area, therefore there are no customary and traditional uses of moose in this area.

The intensive management population objective for moose in Unit 15C is 2,500-3,500 and the IM harvest objective is 200-350 moose.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The antlerless moose season within 15C (DM549) and the targeted hunt (AM550) along the Sterling Highway in 15C would be reauthorized. This harvest may help minimize human–moose conflicts and winter-kill deaths of moose due to habitat limitations.

**BACKGROUND:** Antlerless moose hunts must be reauthorized annually by the board. In February 2023, a GSPE census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in an initial population estimate of 5,162 moose (95% CI: 3,934–6390). However, after the estimate was adjusted for the area surveyed the corrected population estimate is 5,975 moose (95% CI: range 4,787–7,162), of which 22% (95% CI: 15–28) were calves. This equates to a density of approximately 5.1 moose/mi<sup>2</sup> in the census area and indicates the population has continued to grow since 2010. However, the spatial distribution of moose during winter is heavily skewed away from elevations > 1000 feet in Unit 15C. This creates high variance of moose abundance in grid cells and removal of a single high density grid cell from the GSPE census reduces the population estimate to 5,522 moose (95% CI: range 4,435–6,608), of

which 20% (95% CI: 14–26) were calves. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be above the upper end of the Intensive Management population objective of 3,500 moose. Fall composition counts in core count areas during November 2023 provided a bull ratio of 36 bulls:100 cows. Antlerless hunts, such as DM549 and AM550, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat.

The lowlands in Unit 15C, south of Deep Creek and Caribou Lake, which encompasses the hunt boundary of DM549, contain high densities of moose when deep snow drives moose to lower elevations. The human population continues to grow in these areas doubling in size since the 1980’s, according to U.S. Census Bureau statistics. In 2023, the hunt area was expanded to reduce hunter conflicts with private property owners. Even without deep snow, some moose die due to malnutrition and negative interactions with humans occur as moose become more aggressive in their search for food around human residences. Fifty permits were issued in each of the last 10 years resulting in an average harvest of 27 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 65 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year will depend on conditions, and it is possible no permits will be issued in some years.

**DEPARTMENT COMMENTS:** The department submitted and **SUPPORTS** this proposal. A limited antlerless moose harvest that provides additional opportunity and helps to limit habitat degradation and wildlife conflicts. Antlerless hunts are a useful tool to aid in achieving harvest objectives as set by the board.

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

\*\*\*\*\*