

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS 72, 198-208, AND 240-248
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 72 – 5 AAC 92.108. Identified big game prey populations. Establish intensive management (IM) findings for sheep populations, and population and harvest objectives if applicable, in the Southcentral Region.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would establish intensive management (IM) findings for sheep populations and establish population and harvest objectives if the populations have a positive IM finding, in the Southcentral Region.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.108. Identified big game prey populations.

Population	Finding	Population Objective	Harvest Objective
...			
Sheep			
GMUs 7 and 15 (Kenai Peninsula)	xxxx	xxxx	xxxx
GMU 14(C) (Chugach Mountains)	xxxx	xxxx	xxxx

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The IM implementation process for a new species consists of three steps, 1) Identification of ungulate populations that are important for providing high levels of consumptive use. 2) Establishing population objectives and harvest objectives for the identified populations. 3) Applying the population and harvest objectives to decision making.

If the board adopts this proposal and applies the harvest threshold to determine if either of these populations has a positive IM finding that will be accomplishing the second step in the process of implementing IM.

BACKGROUND: At the March 2025 Statewide Board of Game meeting in Anchorage the board adopted a proposal to establish sheep as an intensive management species under **5 AAC 92.106. Intensive management of identified big game prey populations.** Currently no sheep populations have an IM finding. This would be the first application of either population or harvest objectives to a sheep population to determine if either of these populations has a positive or negative IM finding.

Unlike moose or caribou populations, DWC does not have a statistically validated way to count sheep and correct for the number of animals that may be missed during a survey. Further, with a few notable exceptions, sheep trend count areas encompass only a fraction of the geographic extent of sheep range in a particular unit. Trend count areas are surveyed at different scales, intensities, and time frames. As a result, innovative techniques to determine population objectives may be required.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal as part of the IM process. The department is **NEUTRAL** to the Units 7 and 15 (Kenai Mountains) and Unit 14C (Chugach Mountains) sheep populations having a positive or negative IM finding.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department in the form of assessing each sheep population to aid the board in determining the feasibility of IM actions for identified populations.

PROPOSAL 198 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Shorten the deer hunting season for nonresidents in the remainder of Unit 8.

PROPOSED BY: Stig Yngve

WHAT WOULD THE PROPOSAL DO? This proposal seeks to shorten the nonresident deer hunting season in Unit 8 Remainder by 36 days to end November 25 instead of December 31.

WHAT ARE THE CURRENT REGULATIONS?

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

(6)
Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale

Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay

1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31

Remainder of Unit 8

RESIDENT HUNTERS

3 deer; however, only bucks may be taken before Oct. 1	Aug. 1 - Dec. 31
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NONRESIDENT HUNTERS

1 buck	Aug. 1 - Dec. 31
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There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would shorten the nonresident hunting season for deer in the Remainder of Unit 8 (non-road system) by 36 days and may decrease nonresident deer harvest in the remainder area. A shortened nonresident deer season will likely have minimal impact on the overall population but would result in reduced harvest opportunity for nonresidents.

BACKGROUND: Prior to 2023, residents and nonresidents had the same hunting season and bag limit for deer in the remainder of Unit 8. At the March 2023 Southcentral Region Board of Game meeting, the board adopted a proposal to reduce the nonresident bag limit to what it is today.

Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents, and income generated from services provided for resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where deer originated in southeast Alaska; much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2019-2020, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has largely recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons of moderate winter conditions.

During the 8 years prior to the nonresident bag limit change in RY23 (RY15-RY22), an average of 4,093 hunters (residents and nonresidents) entered the field annually with an average success rate of 72%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 5,165 deer, of which 84% are male. Between RY15 and RY22, on average 49% of successful hunters harvested 1 deer, 27% harvested 2 deer, and 24% harvested 3 deer. Most deer harvest occurs during the months of October, November, and December with 8-year averages for these months (RY15-RY22) totaling 25.2%, 43.2%, and 18.1% of the annual harvest, respectively.

Successful nonresident hunters harvested approximately 1.4 deer/year for the 8 years (RY15–RY22) prior to the nonresident bag limit change in 2023. From RY15–RY22 nonresidents comprised about 27.3% of deer hunters annually (average 1,112) of which approximately 71% were successful, resulting in an average 8-year, nonresident harvest of 1,114 deer/year (Range 795–1,468) of which 92% are bucks. However, the total number of nonresident hunters appears to fluctuate with weather (i.e., winter severity) and deer population forecasts. Nonresident hunter participation decreases significantly following harsh winters when deer hunting forecasts are bleak. Successful resident hunters harvested approximately 1.8 deer/year during the same 8-year period (RY15–RY22). Residents comprise 72% of deer hunters of which ~72% of those who hunt are successful, resulting in an average 8-year, resident harvest of 4,039 deer/year (Range 2681–6661) of which approximately 81% are bucks. Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size.

Since the nonresident bag limit change in 2023, successful nonresident hunters have harvested approximately 1.0 deer/year for the last 2 regulatory years (RY23–RY24). From RY23–RY24

nonresidents comprised about 35.9% of deer hunters annually (average 1,445) of which approximately 54% were successful, resulting in an average 2-year, nonresident harvest of 790 deer/year (range 786–793) of which 99% are bucks. During this same time period (RY23–RY24), successful resident hunters harvested approximately 1.7 deer/year and comprised about 63.9% of deer hunters annually (average 2,573) of which approximately 65% were successful. This resulted in an average 2-year resident harvest of 2,890 deer/year (range 2,870–2,909) of which 77% were bucks.

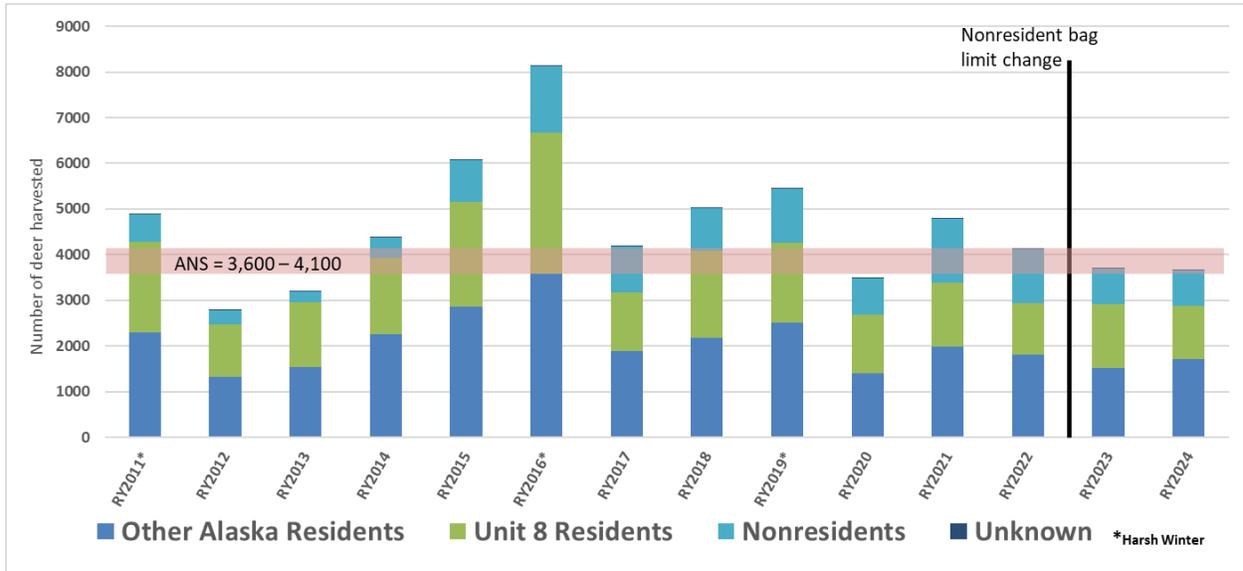


Fig. 1. Unit 8 deer harvest by residency.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from October 1 – January 31.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of reducing the nonresident season for deer in the remainder of Unit 8 and is **OPPOSED** to unnecessary reductions in opportunity.

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

PROPOSAL 199 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Increase the deer bag limit in Unit 8 remainder for nonresidents from 1 buck to 2 or 3 deer.

PROPOSED BY: Mike Carlson

WHAT WOULD THE PROPOSAL DO? This proposal seeks to increase the nonresident bag limit for deer in Unit 8 Remainder from 1 buck to 2 or 3 deer with bucks only available for harvest before October 1.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(6) Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay		
1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31
Remainder of Unit 8		
RESIDENT HUNTERS		
3 deer; however, only bucks may be taken before Oct. 1	Aug. 1 - Dec. 31	
NONRESIDENT HUNTERS		

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the nonresident bag limit for deer in the Remainder of Unit 8 (i.e., non-road system) from 1 buck to 2 or 3 deer, with bucks only available for harvest prior to October 1. This proposal could increase harvest in the remainder area but is likely to have minimal impact on the overall population.

BACKGROUND: Prior to 2023, residents and nonresidents had the same hunting season and bag limit for deer in the remainder of Unit 8. At the March 2023 Southcentral Region Board of Game meeting, the board adopted a proposal to reduce the nonresident bag limit to what it is today based on concerns for declining deer abundance due to severe winter weather.

Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Sitka black-tailed deer surpassed marine mammals as a primary source of mammalian protein for community residents. For example, in the most recent comprehensive subsistence update for southwest Kodiak communities, residents of Old Harbor, Akhiok, and Larsen Bay harvested between 29 – 40 lb. of deer per capita (source: Community Subsistence Information System). Income generated from services provided for resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is primarily driven by winter severity. Unlike areas where they originated (southeast Alaska) much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2019-2020, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has fully recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

During the 8 years prior to the nonresident bag limit change in RY23 (RY15-RY22), an average of 4,093 hunters (residents and nonresidents) entered the field annually with an average success rate of 72%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 5,165 deer, of which 84% are male. Between RY15 and RY22, on average 49% of successful hunters harvested one deer, 27% harvested two deer, and 24% harvested three deer. Most deer harvest occurs during the months of October, November, and December with 8-year averages (RY15-RY22) totaling 25.2%, 43.2%, and 18.1% of the annual harvest, respectively.

Successful nonresident hunters harvested approximately 1.4 deer/year for the 8 years (RY15–RY22) prior to the nonresident bag limit change in 2023. From RY15–RY22 nonresidents comprised about 27.3% of deer hunters annually (average 1,112) of which approximately 71% were successful, resulting in an average 8-year, non-resident harvest of 1,114 deer/year (Range 795–1,468) of which 92% are bucks. However, the total number of nonresident hunters appears to fluctuate with weather (i.e., winter severity) and deer population forecasts. Nonresident hunter participation decreases significantly following harsh winters when deer hunting forecasts are bleak compared to hunter desires. Successful resident hunters harvested approximately 1.8 deer/year during the same 8-year period (RY15–RY22). Residents comprise 72% of deer hunters of which ~72% of those who hunt are successful, resulting in an average 8-year, resident harvest of 4,039 deer/year (Range 2681–6661) of which approximately 81% are bucks. Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size.

Since the nonresident bag limit change in 2023, successful nonresident hunters have harvested approximately 1.0 deer/year for the last 2 regulatory years (RY23–RY24). From RY23–RY24 nonresidents comprised about 35.9% of deer hunters annually (average 1,445) of which approximately 54% were successful, resulting in an average 2-year, nonresident harvest of 790 deer/year (range 786–793) of which 99% are bucks. During this same time period (RY23–RY24), successful resident hunters harvested approximately 1.7 deer/year and comprised about 63.9% of deer hunters annually (average 2,573) of which approximately 65% were successful. This resulted in an average 2-year resident harvest of 2,890 deer/year (range 2,870–2,909) of which 77% were bucks.

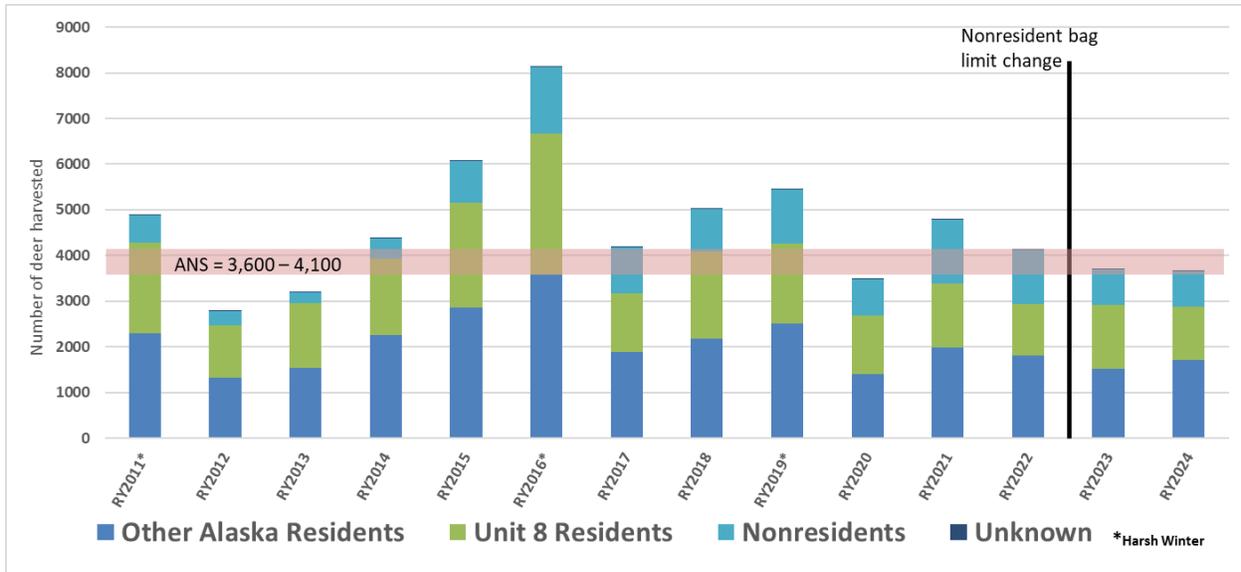


Fig. 1. Unit 8 deer harvest by residency.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from October 1 – January 31.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to change the nonresident bag limit back to what it was, prior to 2023, because an increased bag limit for nonresidents is likely to have minimal impact on the overall population, and the proposal is allocative. 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 200 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Increase the deer bag limit in Unit 8 remainder for nonresidents from 1 buck to 2 bucks.

PROPOSED BY: Roark Brown

WHAT WOULD THE PROPOSAL DO? This proposal seeks to increase the nonresident bag limit for deer in Unit 8 Remainder from 1 buck to 2 bucks.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(6) Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay		
1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
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Remainder of Unit 8		
RESIDENT HUNTERS		
3 deer; however, only bucks	Aug. 1 - Dec. 31	

may be taken before Oct. 1

NONRESIDENT HUNTERS

1 buck

Aug. 1 - Dec. 31

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the nonresident bag limit for deer in the Remainder of Unit 8 (non-road system) from 1 buck to 2 bucks. This proposal could increase nonresident harvest in the remainder area but is likely to have minimal impact on the overall population.

BACKGROUND: Prior to 2023, residents and nonresidents had the same hunting season and bag limit for deer in the remainder of Unit 8. At the March 2023 Southcentral Region Board of Game meeting, the board adopted a proposal to reduce the nonresident bag limit to what it is today based on concerns with declining deer abundance due to severe winter weather.

Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents. For example, in the most recent comprehensive subsistence update for southwest Kodiak communities, residents of Old Harbor, Akhiok, and Larsen Bay harvested between 29 – 40 lb. of deer per capita (Community Subsistence Information System). Income generated from services provided from resident and nonresident deer hunters is a major factor in the local economy.

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last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

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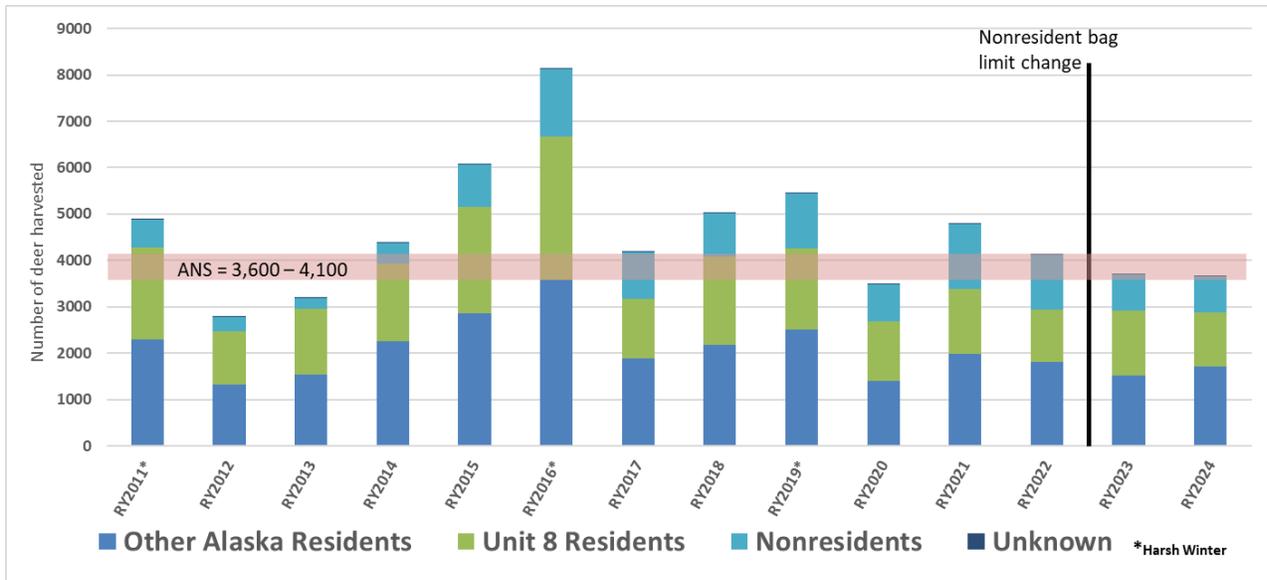


Fig. 1. Unit 8 deer harvest by residency.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to increase the nonresident bag limit for deer in the remainder of Unit 8 because an increased bag limit for nonresidents is likely to have minimal impact on the overall population, and this proposal is allocative. 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 201 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Increase the deer bag limit in Unit 8 remainder for nonresidents from 1 buck to 2 bucks.

PROPOSED BY: Mike Harris

WHAT WOULD THE PROPOSAL DO? This proposal seeks to increase the nonresident bag limit for deer in Unit 8 remainder from 1 buck to 2 bucks.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
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Remainder of Unit 8		
RESIDENT HUNTERS		
3 deer; however, only bucks	Aug. 1 - Dec. 31	

may be taken before Oct. 1

NONRESIDENT HUNTERS

1 buck

Aug. 1 - Dec. 31

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the nonresident bag limit for deer in the remainder of Unit 8 (non-road system) from 1 buck to 2 bucks. This proposal could increase nonresident harvest in the remainder area but is likely to have minimal impact on the overall population.

BACKGROUND: Prior to 2023, residents and nonresidents had the same hunting season and bag limit for deer in the remainder of Unit 8. At the March 2023 Southcentral Region Board of Game meeting, the board adopted a proposal to reduce the nonresident bag limit to what it is today based on concerns with declining deer abundance due to severe winter weather.

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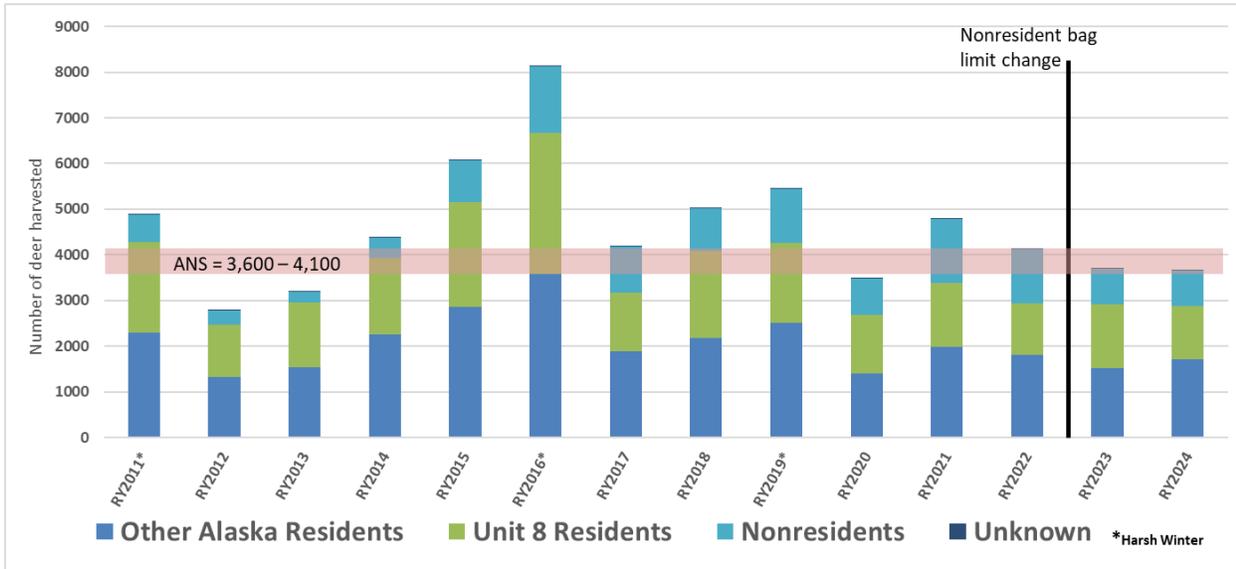


Fig. 1. Unit 8 deer harvest by residency.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to increase the nonresident bag limit for deer in the remainder of Unit 8 from 1 buck to 2 bucks because an increased bag limit for nonresidents is likely to have minimal impact on the overall population, and the proposal is allocative. 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 202 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Change the bag limit for deer in portions of Unit 8.

PROPOSED BY: Brandon Bartleson

WHAT WOULD THE PROPOSAL DO? This proposal seeks to create a new deer management hunt area that is adjacent to the current road system deer management area and consists of guide use areas 01, 02, 26, 27, and 28. The bag limit for this area would be 3 deer total, of which 2 bucks can be harvested from August 1–December 1 and one antlerless deer from December 1–December 31. As written, this proposal would apply to both residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(6) Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay	Aug. 1 - Oct. 31 Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Aug. 1 - Oct. 31 Nov. 1 - Nov. 14 Nov. 16 - Dec. 31
1 buck; or		
1 deer, by bow and arrow or muzzleloader only		

Remainder of Unit 8

RESIDENT HUNTERS

3 deer; however, only bucks
may be taken before Oct. 1

Aug. 1 - Dec. 31

NONRESIDENT HUNTERS

1 buck

Aug. 1 - Dec. 31

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the size of the Kodiak Road System Management Area (KRMA) and create a new hunt area adjacent to the KRMA encompassing guide use areas 01, 02, 26, 27, and 28 (Figure 1). Seasons and bag limits within the KRMA would remain unchanged and little, or no, effect on harvest. The total bag limit in the new hunt area would be 3 deer with 2 bucks available for harvest from Aug. 1–Dec. 1, and one antlerless deer from Dec. 1–Dec. 31. This proposal would likely have minimal biological impact on the overall deer population.

BACKGROUND: Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents. In the most recent comprehensive subsistence update for Port Lions in 2022, residents harvested 15 lb of deer per capita, but residents noted during surveys that it was becoming increasingly difficult to acquire the deer needed due to increased competition from nonlocal hunters. Income generated from services provided to resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where they originated (southeast Alaska), much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2019-2020, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides

indicate the deer population throughout the archipelago has fully recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

Over the last 10 regulatory years (RY) (RY15-RY24), an average of 4,080 hunters (resident and nonresident) have entered the field annually with an average success rate of 69%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 4,870 deer, of which 83% are male. Between RY15 and RY24, on average 53% of successful hunters harvested one deer, 25% harvested two deer, and 19% harvested three deer. Most deer harvest occurs during the months of October, November, and December with 10-year averages totaling 24.9%, 43.7%, and 18% of the annual harvest, respectively.

Deer harvest information in Unit 8 is summarized by survey areas. These areas include several Uniform Coding Units (UCU) that make up large watersheds. The boundaries of these survey areas do not align with the KRMA; survey areas 831, 832, 833 and 834 are entirely or partially included within the KRMA. Harvest statistics from these areas provide an estimate of harvest from that portion of the KRMA east of a line from the mouth of Elbow Creek to the mouth of Sallery Creek. Estimates of harvest from that portion of the KRMA surrounding the community of Port Lions are not available. Between RY15-RY24, an average of 580 deer were harvested annually in these survey areas (11% does and 89% bucks). In the same period, an average of 4,265 deer were harvested annually in the remaining survey areas in Unit 8 (18% does and 82% bucks). Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size. The addition of a new hunt area adjacent to the current road system management area is likely to have minimal impact on the overall population.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from October. 1 – January. 31.

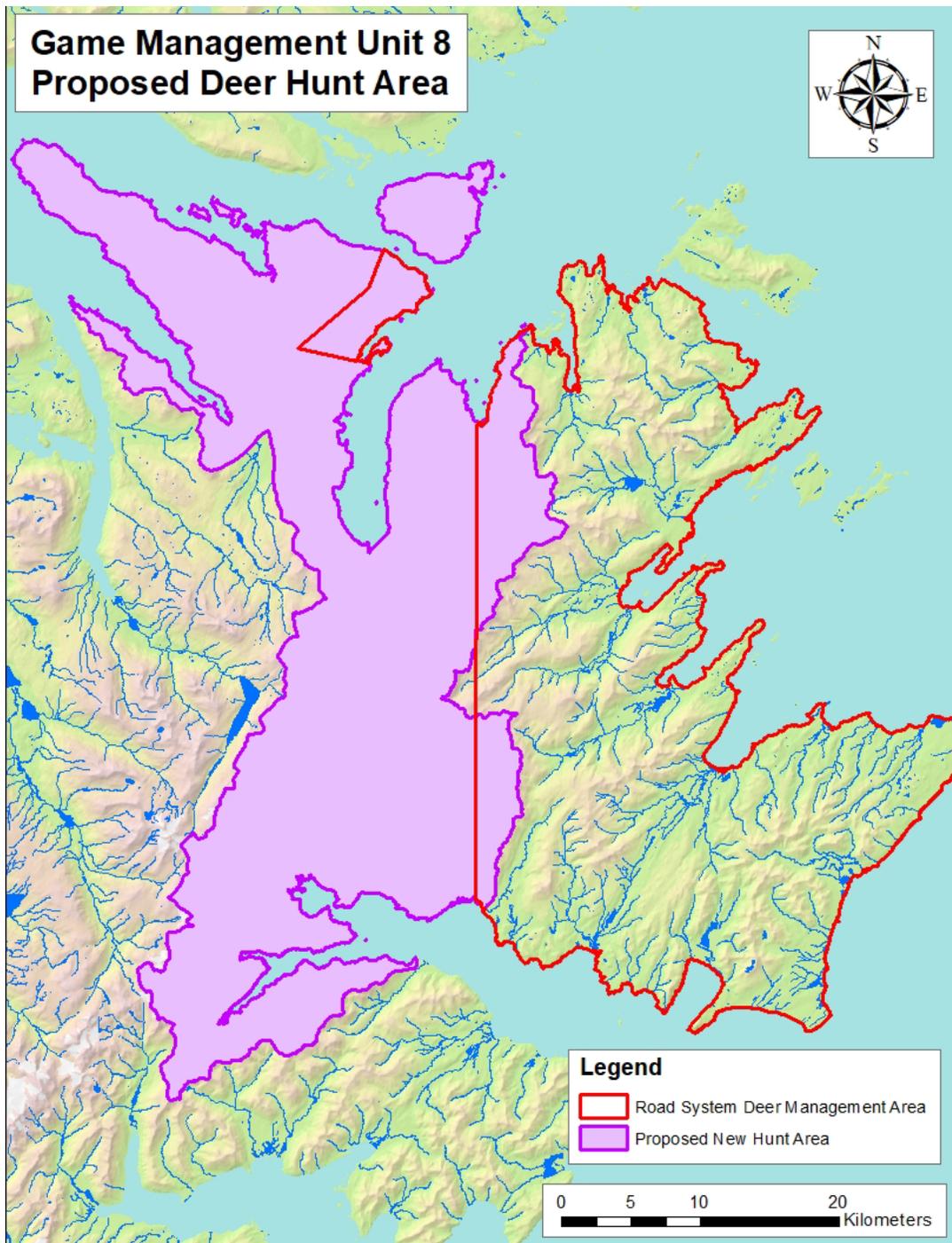


Figure 1. Proposed new deer hunt area comprised of guide use areas 01, 02, 26, 27, and 28 for the Alaska Board of Game meeting, March 2026.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal to create a new deer management area adjacent to the current road system management area due to the increase in regulatory complexity. It is unlikely to have a significant biological impact on the overall deer population. The current Road System Deer Management Area was designed to

provide a measure of protection in areas where deer historically received the heaviest hunting pressure and where winter losses were documented as the most severe.

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

PROPOSAL 203 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Increase the nonresident bag limit for deer in Unit 8 remainder from 1 buck to 3 deer.

PROPOSED BY: Zachary Porter

WHAT WOULD THE PROPOSAL DO? This proposal seeks to increase the nonresident bag limit for deer in Unit 8 remainder from 1 buck to 3 deer total.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(6) Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 buck; or		

1 deer, by bow and arrow or muzzleloader only

Nov. 1 - Nov. 14
Nov. 16 - Dec. 31

Nov. 1 - Nov. 14
Nov. 16 - Dec. 31

Remainder of Unit 8

RESIDENT HUNTERS

3 deer; however, only bucks may be taken before Oct. 1

Aug. 1 - Dec. 31

NONRESIDENT HUNTERS

1 buck

Aug. 1 - Dec. 31

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the nonresident bag limit for deer in the remainder of Unit 8 (non-road system) from 1 buck to 3 deer total. This proposal may increase nonresident harvest in the remainder area but is likely to have minimal impact on the overall population or hunting opportunity.

BACKGROUND: Prior to 2023, residents and nonresidents had the same hunting season and bag limit for deer in the remainder of Unit 8. At the March 2023 Southcentral Region Board of Game meeting, the board adopted a proposal to reduce the nonresident bag limit to what it is today based on concerns over declining deer abundance due to severe winter weather.

Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents. For example, in the most recent comprehensive subsistence update for southwest Kodiak communities, residents of Old Harbor, Akhiok, and Larsen Bay harvested between 29 – 40 lb of deer per capita (Community Subsistence Information System). Income generated from services provided from resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where they originated (southeast Alaska); much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2018-2019, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has fully recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

During the 8 years prior to the nonresident bag limit change in RY23 (RY15-RY22), an average of 4,093 hunters (residents and nonresidents) entered the field annually with an average success rate of 72%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 5,165 deer, of which 84% are male. Between RY15 and RY22, on average 49% of successful hunters harvested one deer, 27% harvested two deer, and 24% harvested three deer. Most deer harvest occurs during the months of October, November, and December with 8-year averages (RY15-RY22) totaling 25.2%, 43.2%, and 18.1% of the annual harvest, respectively.

Successful nonresident hunters harvested approximately 1.4 deer/year for the 8 years (RY15–RY22) prior to the nonresident bag limit change in 2023. From RY15–RY22 nonresidents comprised about 27.3% of deer hunters annually (average 1,112) of which approximately 71% were successful, resulting in an average 8-year, non-resident harvest of 1,114 deer/year (Range 795–1,468) of which 92% are bucks. However, the total number of nonresident hunters appears to fluctuate with weather (i.e., winter severity) and deer population forecasts. Nonresident hunter participation decreases significantly following harsh winters when deer hunting forecasts are bleak. Successful resident hunters harvested approximately 1.8 deer/year during the same 8 year period (RY15–RY22). Residents comprise 72% of deer hunters of which ~72% of those who hunt are successful, resulting in an average 8-year, resident harvest of 4,039 deer/year (Range 2681–6661) of which approximately 81% are bucks. Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size.

Since the nonresident bag limit change in 2023, successful nonresident hunters have harvested approximately 1.0 deer/year for the last 2 regulatory years (RY23–RY24). From RY23–RY24 nonresidents comprised about 35.9% of deer hunters annually (average 1,445) of which approximately 54% were successful, resulting in an average 2-year, nonresident harvest of 790 deer/year (range 786–793) of which 99% are bucks. During this same time period (RY23–RY24), successful resident hunters harvested approximately 1.7 deer/year and comprised about 63.9% of deer hunters annually (average 2,573) of which approximately 65% were successful.

This resulted in an average 2-year resident harvest of 2,890 deer/year (range 2,870–2,909) of which 77% were bucks.

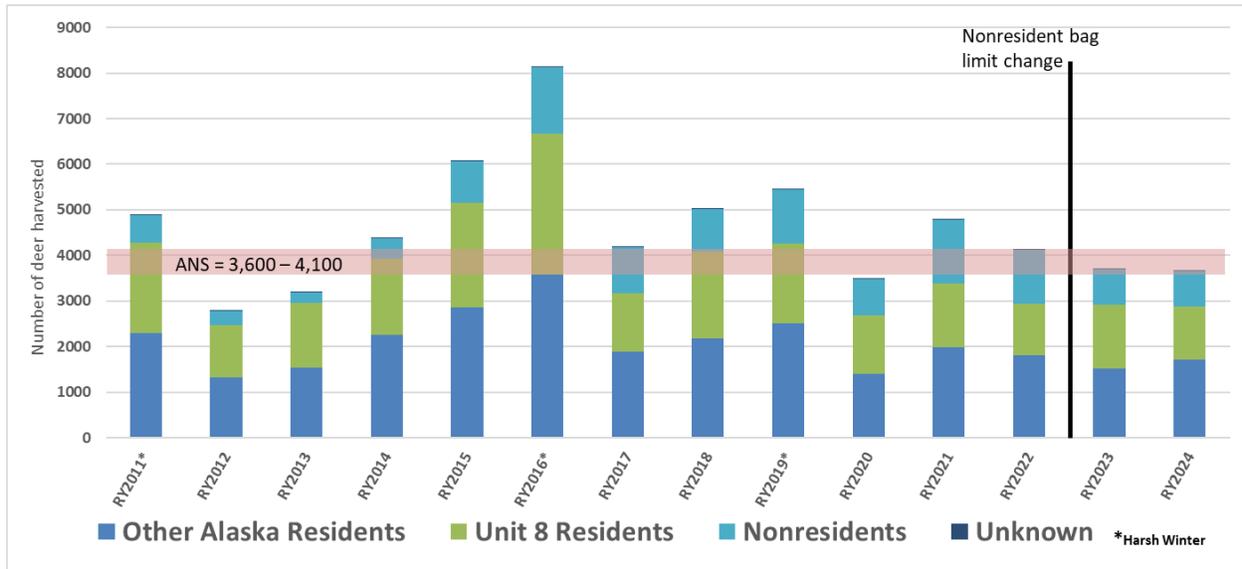


Fig. 1. Unit 8 deer harvest by residency.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to increase the nonresident bag limit for deer in the remainder of Unit 8 from 1 buck to 3 deer because an increased bag limit for nonresidents is likely to have minimal impact on the overall population, and the proposal is allocative. 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 204 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Increase the deer bag limit in Unit 8 remainder for nonresidents from 1 buck to 2 bucks.

PROPOSED BY: Austin Atkinson

WHAT WOULD THE PROPOSAL DO? This proposal seeks to increase the nonresident bag limit for deer in Unit 8 remainder from 1 buck to 2 bucks.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(6) Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay		
1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31
Remainder of Unit 8		
RESIDENT HUNTERS		
3 deer; however, only bucks	Aug. 1 - Dec. 31	

may be taken before Oct. 1

NONRESIDENT HUNTERS

1 buck

Aug. 1 - Dec. 31

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the nonresident bag limit for deer in the remainder of Unit 8 (non-road system) from 1 buck to 2 bucks. This proposal may increase nonresident buck harvest in the remainder area but is likely to have minimal impact on the overall population or opportunity.

BACKGROUND: Prior to 2023, residents and nonresidents had the same hunting season and bag limit for deer in the remainder of Unit 8. At the March 2023 Southcentral Region Board of Game meeting, the board adopted a proposal to reduce the nonresident bag limit to what it is today based on declining deer abundance due to severe winter weather.

Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents. For example, in the most recent comprehensive subsistence update for southwest Kodiak communities, residents of Old Harbor, Akhiok, and Larsen Bay harvested between 29 – 40 lb. of deer per capita (Community Subsistence Information System). Income generated from services provided to resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where they originated (southeast Alaska); much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2018-2019, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has fully recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the

last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

During the 8 years prior to the nonresident bag limit change in RY23 (RY15-RY22), an average of 4,093 hunters (residents and nonresidents) entered the field annually with an average success rate of 72%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 5,165 deer, of which 84% are male. Between RY15 and RY22, on average 49% of successful hunters harvested one deer, 27% harvested two deer, and 24% harvested three deer. Most deer harvest occurs during the months of October, November, and December with 8-year averages (RY15-RY22) totaling 25.2%, 43.2%, and 18.1% of the annual harvest, respectively.

Successful nonresident hunters harvested approximately 1.4 deer/year for the 8 years (RY15–RY22) prior to the nonresident bag limit change in 2023. From RY15–RY22 nonresidents comprised about 27.3% of deer hunters annually (average 1,112) of which approximately 71% were successful, resulting in an average 8-year, non-resident harvest of 1,114 deer/year (Range 795–1,468) of which 92% are bucks. However, the total number of nonresident hunters appears to fluctuate with weather (i.e., winter severity) and deer population forecasts. Nonresident hunter participation decreases significantly following harsh winters when deer hunting forecasts are bleak. Successful resident hunters harvested approximately 1.8 deer/year during the same 8 year period (RY15–RY22). Residents comprise 72% of deer hunters of which ~72% of those who hunt are successful, resulting in an average 8-year, resident harvest of 4,039 deer/year (Range 2681–6661) of which approximately 81% are bucks. Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size.

Since the nonresident bag limit change in 2023, successful nonresident hunters have harvested approximately 1.0 deer/year for the last 2 regulatory years (RY23–RY24). From RY23–RY24 nonresidents comprised about 35.9% of deer hunters annually (average 1,445) of which approximately 54% were successful, resulting in an average 2-year, nonresident harvest of 790 deer/year (range 786–793) of which 99% are bucks. During this same time period (RY23–RY24), successful resident hunters harvested approximately 1.7 deer/year and comprised about 63.9% of deer hunters annually (average 2,573) of which approximately 65% were successful. This resulted in an average 2-year resident harvest of 2,890 deer/year (range 2,870–2,909) of which 77% were bucks.

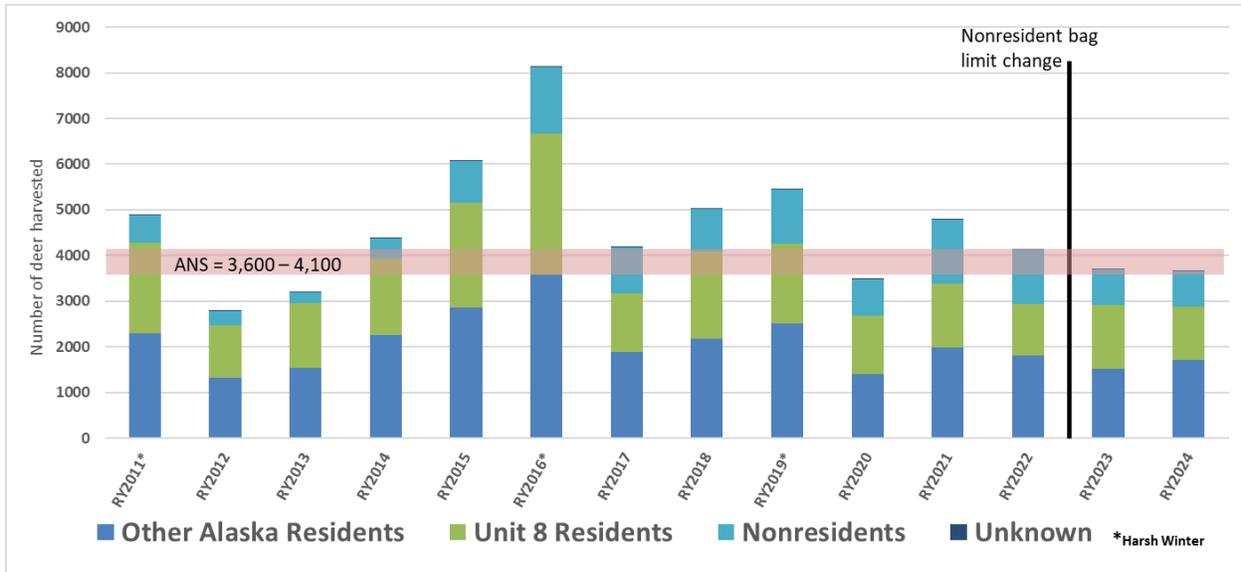


Fig. 1. Unit 8 deer harvest by residency.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to increase the nonresident bag limit for deer in the remainder of Unit 8 from 1 buck to 2 bucks because an increased bag limit for nonresidents is likely to have minimal impact on the overall population, and the proposal is allocative. 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 205 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Change season dates and bag limits for deer in a portion of Unit 8.

PROPOSED BY: Lucas Smith

WHAT WOULD THE PROPOSAL DO? This proposal seeks to create a new deer management hunt area adjacent to the Kodiak Road System Management Area (KRMA) with unique season dates, bag limits, and antler restrictions. The newly created hunt area would include portions of Unit 8 accessible along established trails by off-road vehicles outside the KRMA in Ugak Bay, including Saltery Cove and Rough Creek. The new hunt area would also have distinct season dates and bag limits for youth hunters and hunters with disabilities.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(6) Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay		
1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31
Remainder of Unit 8		
RESIDENT HUNTERS		
3 deer; however, only bucks may be taken before Oct. 1	Aug. 1 - Dec. 31	
NONRESIDENT HUNTERS		
1 buck		Aug. 1 - Dec. 31

There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would create a new hunt area for deer adjacent to the Kodiak Road System Management Areas in portions of Unit 8 accessible along established trails by off-road vehicles outside the Kodiak Road System Management Area. The proposal will introduce an antler restriction for deer in the proposed area, and will create additional opportunity for youth and disabled hunters. The proposal does not specify if the changes are intended to apply to residents, nonresidents, or both. The newly created hunt area would have the following season dates, bag limits, and antler restrictions:

Residents and Nonresidents:

August 1 – October 31

3 bucks

No antler restrictions

No weapons restrictions

November 1 – November 30

3 adult deer

Harvested bucks must have minimum spike length of 3 inches, harvest of does with fawns and fawns prohibited

No weapons restrictions

December 1 – December 31

3 adult deer

Harvested bucks must have minimum spike length of 3 inches

Muzzleloader or primitive weapons only

Youth hunters and hunters with disabilities:

August 1 – December 31

3 deer of any sex or age

No weapons restrictions

If adopted, this proposal would increase regulatory complexity which may be difficult for hunters to understand, for the department to explain, and may make enforcement difficult.

BACKGROUND: Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents. In the most recent comprehensive subsistence update for Port Lions in 2022, residents harvested 15 lb of deer per capita but noted that it was becoming increasingly difficult to acquire the deer needed due to increased competition from nonlocal hunters. Income generated from services provided to resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where they originated (southeast Alaska), much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2018-2019, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has fully recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions. Currently there are no biological concerns for deer in Unit 8.

Over the last 10 years (RY15-RY24), an average of 4,080 hunters (residents and nonresidents) have entered the field annually with an average success rate of 69%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 4,870 deer, of which 83% are male. Between RY15 and RY24, on average 53% of successful hunters harvested one deer, 25% harvested two deer, and 19% harvested three deer. Most deer harvest occurs during the months of October, November, and December with 10-year averages totaling 24.9%, 43.7%, and 18% of the annual harvest, respectively.

Deer harvest information in Unit 8 is summarized by survey areas. These areas include several Uniform Coding Units (UCU) that make up large watersheds. The boundaries of these survey areas do not align with the KRMA; survey areas 831, 832, 833 and 834 are entirely or partially included within the KRMA. Harvest statistics from these areas provide an estimate of harvest from that portion of the KRMA east of a line from the mouth of Elbow Creek to the mouth of Sallery Creek. Estimates of harvest from that portion of the KRMA surrounding the community of Port Lions are not available. Between RY15-RY24, an average of 580 deer were harvested annually in these survey areas (11% does and 89% bucks). In the same period, an average of 4,265 deer were harvested annually in the remaining survey areas in Unit 8 (18% does and 82% bucks). Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size. However, the new hunt area would create a unique hunting season for youth hunters and hunters with disabilities allowing increased hunting opportunities. Youth only deer hunting opportunities are currently available in the KRMA through a weapons restricted hunt during the period Nov. 16-Dec. 31. Disabled hunter

opportunity is available, primarily through methods and means exemptions, for a variety of species in Unit 8.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

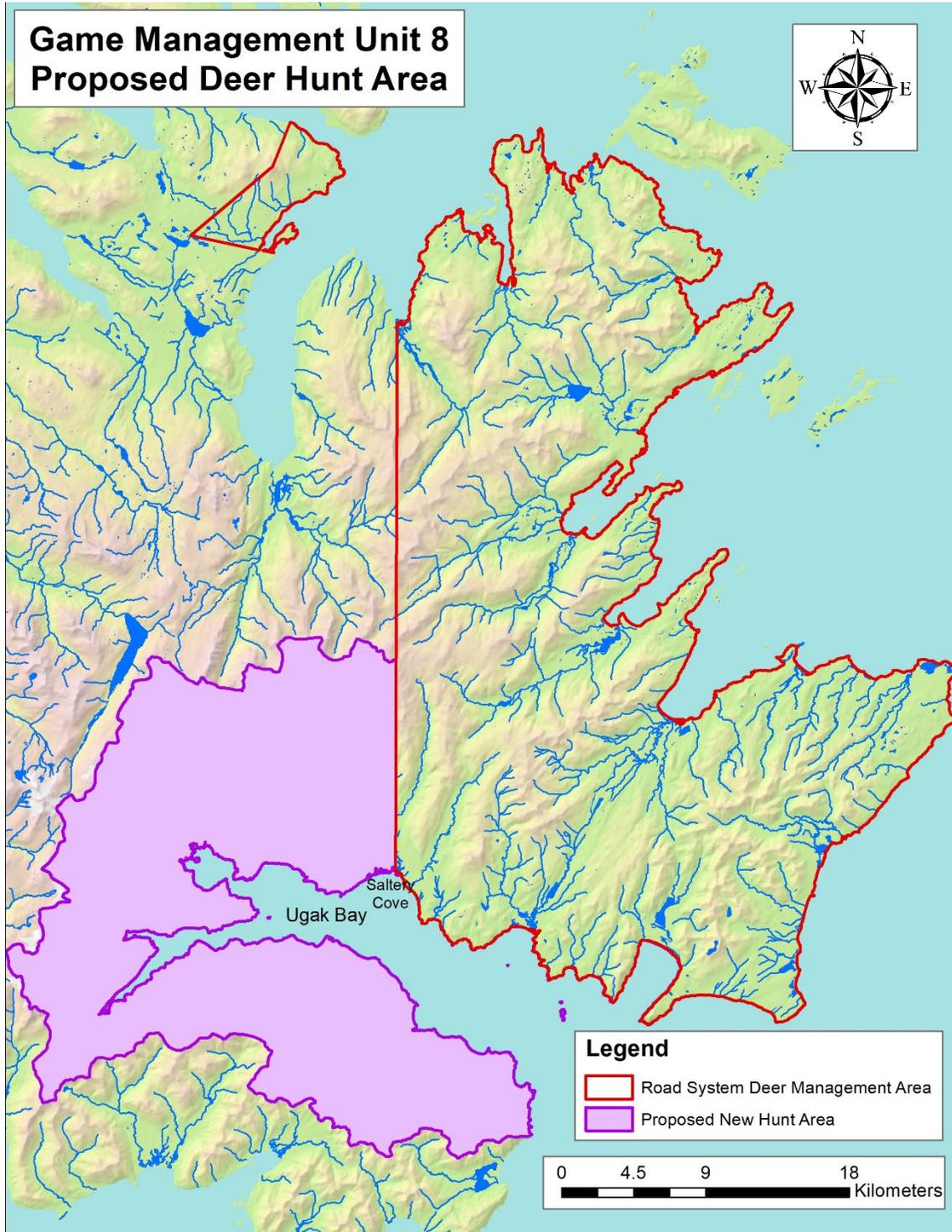


Figure 1. Proposed new deer hunt area comprised of off-road accessible areas in Ugak Bay, including Saltery Cove and Rough Creek for the Alaska Board of Game meeting, March 2026.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on creating a new deer management hunt area adjacent to the current Unit 8 road system hunt area with unique season dates, bag limits, and antler restrictions. This proposal would increase regulatory complexity and is likely to have minimal impact on the overall deer population. Antler restrictions for deer are not necessary as the herd has fully recovered from declines caused by severe winter weather. The department **SUPPORTS** providing additional opportunity for youth hunters or hunters with disabilities and is available to work with hunters to identify areas and develop future board proposals. If the board adopts the proposal it will need to discuss and determine if the changes are applicable to residents, nonresidents or both.

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 206 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Change the boundary of the Kodiak Road System Management Area for deer hunting.

PROPOSED BY: John Neff

WHAT WOULD THE PROPOSAL DO? This proposal seeks to move the southern terminus of the western boundary of the Kodiak Road System Management Area (KRMA) from the mouth of the Saltery creek to the mouth of Wild Creek.

WHAT ARE THE CURRENT REGULATIONS?

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

(6)
Unit 8, that portion of
Kodiak Island north of a
line from the head of
Settlers Cove to Crescent

Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay

1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31

Remainder of Unit 8

RESIDENT HUNTERS

3 deer; however, only bucks may be taken before Oct. 1	Aug. 1 - Dec. 31
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NONRESIDENT HUNTERS

1 buck	Aug. 1 - Dec. 31
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There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would move the southern terminus of the western boundary of the KRMA from the mouth of Saltery Creek to the mouth of Wild Creek (Figure 1). The northern terminus of the western boundary of the KRMA (mouth of Elbow Creek) would remain unchanged. This proposal would increase the size of the KRMA. If adopted this proposal is not anticipated to have a significant impact on harvest or hunting opportunity.

BACKGROUND: Deer are an important subsistence, economic, and recreational resource throughout the Kodiak Archipelago. Venison has surpassed marine mammals as a primary source of mammalian protein for community residents. In the most recent comprehensive

subsistence update for the Kodiak road system, residents harvested 6 lb. of deer per capita (Community Subsistence Information System). Income generated from services provided to resident and nonresident deer hunters is a major factor in the local economy.

Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where they originated (southeast Alaska), much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2018-2019, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has fully recovered. This recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last 5 years. Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

Deer harvest information in Unit 8 is summarized by survey areas. These areas consist of several Uniform Coding Units (UCU) that make up large watersheds. The boundaries of these survey areas do not align with the KRMA; survey areas 831, 832, 833 and 834 are entirely or partially included within the KRMA. Harvest statistics from these areas provide an estimate of harvest from that portion of the KRMA east of a line from the mouth of Elbow Creek to the mouth of Saltery Creek. Estimates of harvest from that portion of the KRMA near the community of Port Lions are not available. On average over the last 5 years (RY20–RY24), 435 deer have been harvested annually from survey areas 831-834 and 3,507 deer have been harvested from the remaining survey areas in Unit 8 (810-830, 835). Compared to the previous 5-year period (RY15–RY19) when an average of 725 deer were harvested annually from survey areas 831-834 and 5,024 deer annually were harvested from the remaining survey areas in Unit 8 (810-830, 835). Hunter participation within survey areas 831-834 has decreased from slightly from 1028 hunters RY15–RY19 to 764 hunters in survey areas 831-834 during RY20–RY24. Overall, deer harvest on the road system has been fairly stable except for a few years of high harvest during RY15 and RY16 when the population was at its highest level since harvest reporting became mandatory. This increase in harvest was a function of an increase in hunter participation paired with several years of high overwinter deer survival.

The road system deer management area is open to both residents and nonresidents; seasons and bag limits are the same for both groups.

Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size. There are no current biological concerns regarding the deer population on Kodiak. Changing the hunt boundary of the KRMA is likely to have minimal impact on the overall deer population.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

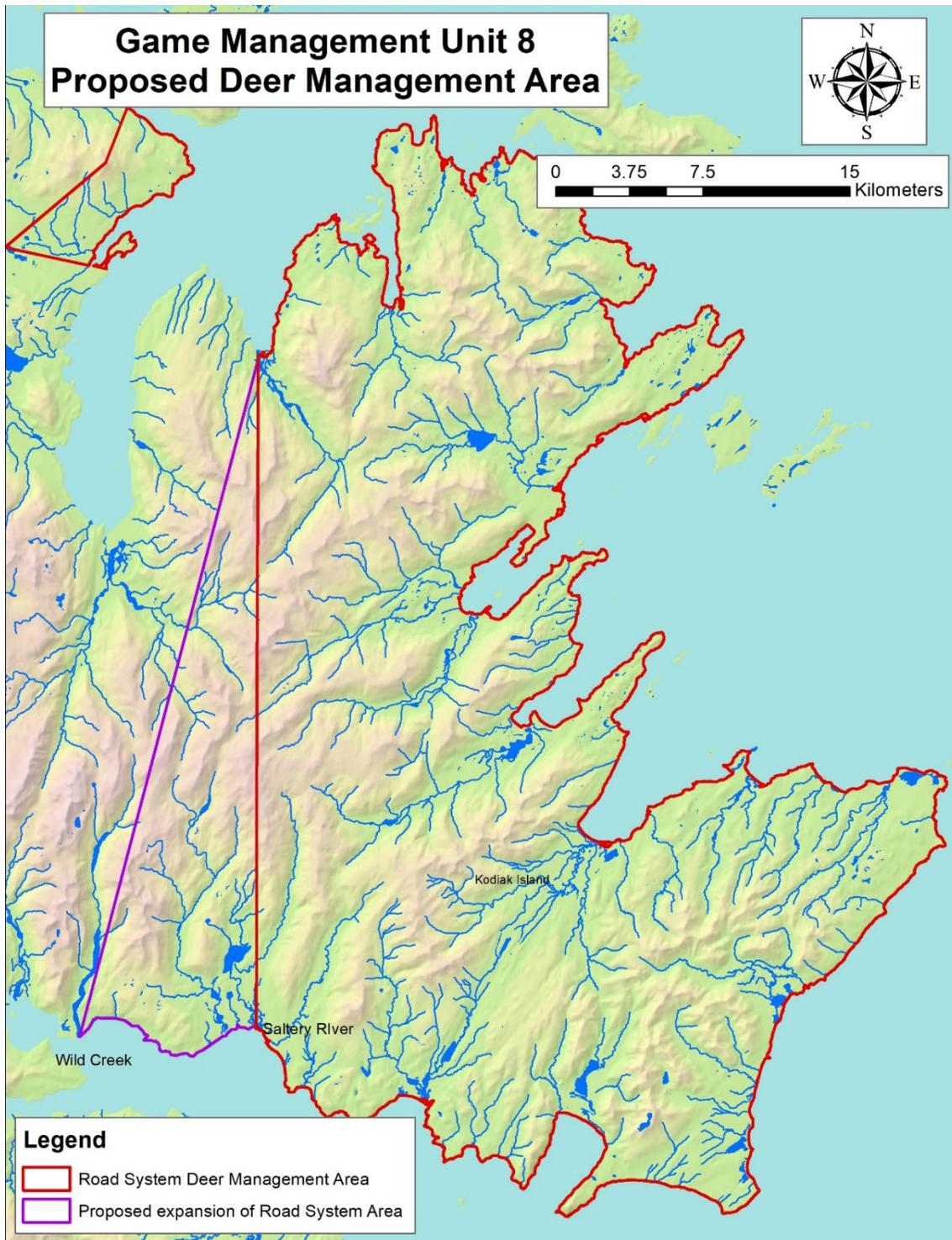


Figure 1. Proposed modified hunt boundaries for the road system deer management hunt area proposed for the Alaska Board of Game meeting, March 2026.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is unlikely this proposal would significantly impact deer abundance or harvest. If adopted, the department will do outreach to ensure hunters and others are informed.

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

PROPOSAL 207 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Require an antler restriction for deer in a portion of Unit 8.

PROPOSED BY: Brandon Bartleson

WHAT WOULD THE PROPOSAL DO? This proposal seeks to create a new deer management hunt area that is adjacent to the Kodiak Road System Management Area (KRMA), consisting of guide use areas 01, 02, 26, 27, and 28 and implement unique antler restrictions in this area such that bucks must have a fork on at least one side of their antlers before they are legal for harvest.

WHAT ARE THE CURRENT REGULATIONS?

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

(6)
Unit 8, that portion of Kodiak Island north of a line from the head of Settlers Cove to Crescent Lake (57° 52' N. lat., 152° 58' W. long.), and east of a line from the outlet of Crescent Lake to Mount Ellison Peak and from Mount Ellison Peak to Pokati Point at Whale Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and

adjacent small islands in
Chiniak Bay

1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31

Remainder of Unit 8

RESIDENT HUNTERS

3 deer; however, only bucks may be taken before Oct. 1	Aug. 1 - Dec. 31
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NONRESIDENT HUNTERS

1 buck	Aug. 1 - Dec. 31
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There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the size of the KRMA and create a new adjacent hunt area that encompasses guide use areas 01, 02, 26, 27, and 28 (Figure 1). Bag limits for the Kodiak Road System Management Area would remain unchanged. The newly created hunt area would establish antler restrictions that would define a legal animal as a buck with a forked antler on at least one side. If passed, this proposal would increase regulatory complexity, unnecessarily restrict reasonable opportunity for subsistence users as a result of the antler restrictions and may reduce the harvest of younger age-class bucks in the area.

BACKGROUND: Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas of southeast Alaska where Sitka Black-tailed deer are native, much of the Kodiak archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides also provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2018-2019, with an estimated

25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has largely recovered. The recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last few years. Supporting this assertion, deer mortality surveys conducted in 2024 and 2025 indicated minimal winter mortality (2 and 0 deer, respectively) in the primary area historically surveyed to assess winter mortality (i.e. Chief Cove). Observed winter mortality in 2024 and 2025 differed significantly from observed winter mortality in this area following years with harsh winter conditions (2006: 47 observed deer mortalities, 2008: 40, 2016: 30). Anecdotal reports and historical surveys indicate the deer population commonly recovers following 3-4 seasons with moderate winter conditions.

Although harvest of deer is an important consideration, hunter harvest is presumed to have minimal impact on the overall population size. There are no current biological concerns regarding the deer population on Kodiak. The addition of a new hunt area adjacent to the current road system management area that has unique antler restrictions for bucks would presumably decrease the harvest of younger age class bucks but is likely to have minimal impact on the overall population. Currently there are no other antlered deer hunts in the state that restrict harvest by points or configuration.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of August 1-January 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

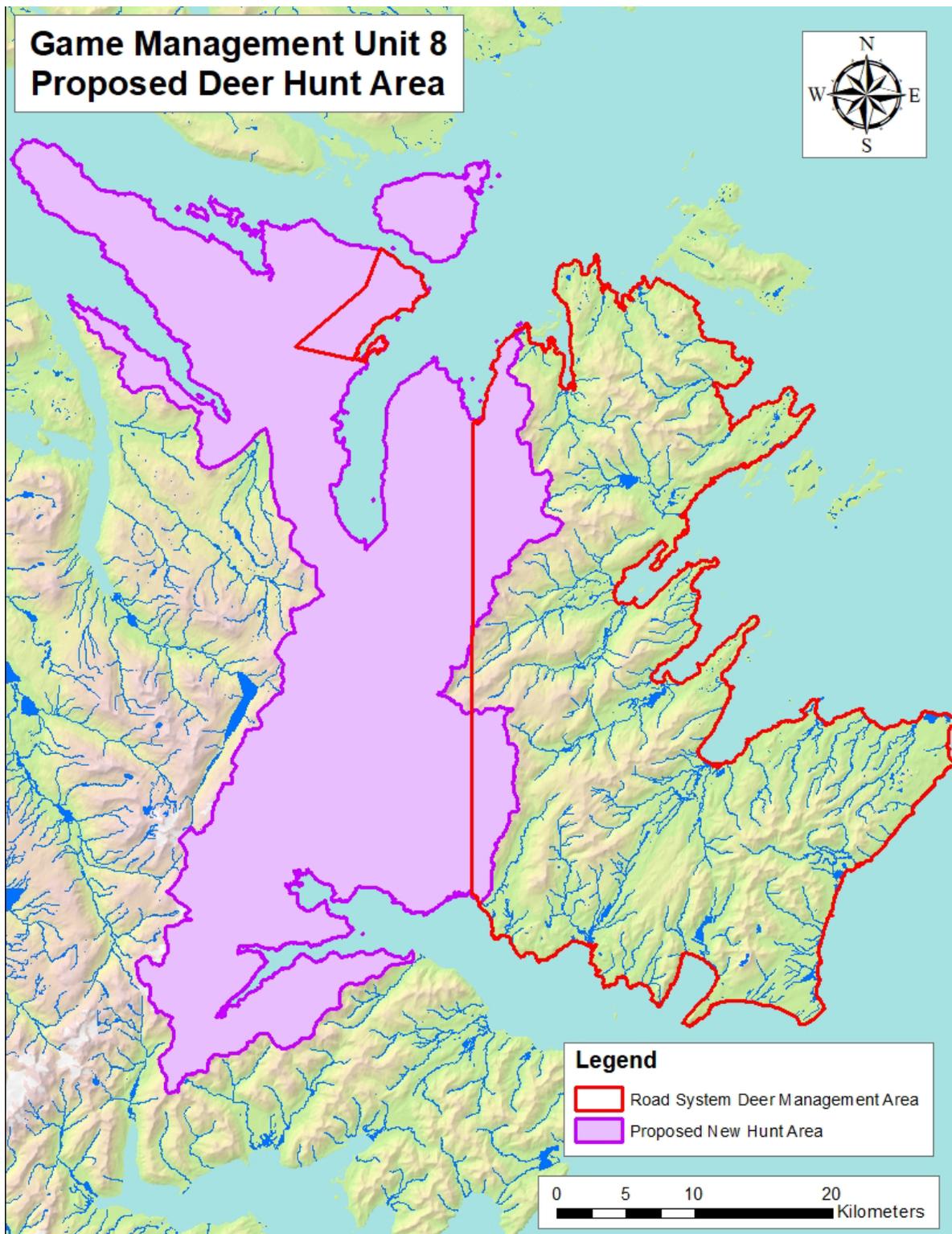


Figure 1. Proposed new deer hunt area comprised of guide use areas 01, 02, 26, 27, and 28 for the Alaska Board of Game meeting, March 2026.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The proposal would increase regulatory complexity and reduce opportunity by implementing antler restrictions for bucks in this area. While antler/horn restrictions are common for some species throughout the state, there has never been an antler restriction for deer in Alaska and, in January 2025, the board did not adopt a proposal to create a similar antler restriction for deer in Unit 1. The implementation of this proposal would require the board to develop legal definitions for deer antlers. 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 result in additional costs for the department in the form of educational materials to explain the new regulatory change to deer hunters.

PROPOSAL 208 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Prohibit the take of fawns or does with fawns in Unit 8.

PROPOSED BY: Jessie Juhlin

WHAT WOULD THE PROPOSAL DO? Harvesting fawns or does with fawns would not be allowed in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

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

(6)
Unit 8, that portion of
Kodiak Island north of a
line from the head of
Settlers Cove to Crescent
Lake (57° 52' N. lat.,
152° 58' W. long.), and
east of a line from the
outlet of Crescent Lake to
Mount Ellison Peak and from
Mount Ellison Peak to
Pokati Point at Whale

Passage, and that portion of Kodiak Island east of a line from the mouth of Saltery Creek to the mouth of Elbow Creek, and adjacent small islands in Chiniak Bay

1 buck; or	Aug. 1 - Oct. 31	Aug. 1 - Oct. 31
1 deer, by bow and arrow or muzzleloader only	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31	Nov. 1 - Nov. 14 Nov. 16 - Dec. 31

Remainder of Unit 8

RESIDENT HUNTERS

3 deer; however, only bucks may be taken before Oct. 1	Aug. 1 - Dec. 31
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NONRESIDENT HUNTERS

1 buck	Aug. 1 - Dec. 31
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There is a positive customary and tradition use finding for deer in Unit 8, and an amount reasonably necessary for subsistence uses of 3,600–4,100 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would prohibit the harvest of fawns or does with fawns in Unit 8 for both residents and nonresidents for the entirety of the deer hunting season. This proposal would reduce the opportunity for hunters to harvest female deer during late season hunts when juvenile deer are no longer dependent on does. Although this proposal would reduce female harvest and increase female survival, it is likely to have minimal impact on the overall population as deer survival is primarily influenced by winter severity. However, a reduction in female harvest in areas that regularly experience increased hunting pressure (i.e., bays) may result in localized increases in female survival and fawn recruitment. Deer “fawns” are not currently defined in codified regulations.

BACKGROUND: Although hunting is an important consideration, deer mortality in Unit 8 is thought to be primarily driven by winter severity. Unlike areas where they originated (southeast Alaska), much of the archipelago lacks dense coniferous forests which provide thermal cover, reduced snow depth, and vegetative forage during harsh winters. As a result, the deer population on the Kodiak archipelago is primarily affected by weather patterns and fluctuations in winter severity.

Annual winter mortality is assessed by searching for and examining deer carcasses in known coastal wintering areas. Winter conditions and physical appearance of deer are evaluated using aerial surveys. Local hunters and guides also provide anecdotal information on deer mortality, body condition, and general appearance throughout the season. The Unit 8 deer population experienced substantial winter mortality during the harsh winter of 2018-2019, with an estimated 25-30% loss of the overall population and up to a 60-70% reduction in some of the harder hit areas of the island. However, recent surveys (2020–2025) and reports from hunters and guides indicate the deer population throughout the archipelago has largely recovered. The recovery of the deer population is likely a result of moderate winter conditions experienced on Kodiak over the last few years.

Over the last 10 years (RY15–RY24), an average of 4,080 hunters (residents and nonresidents) entered the field annually with an average success rate of 69%. Successful hunters harvested approximately 1.7 deer/year, with an average annual harvest of 4,870 deer, of which 17% are female. Between RY15 and RY24, on average 53% of hunters harvested one deer, 25% of hunters harvested two deer, and 19% of hunters harvested three deer. Most deer harvest occurs during the months of October, November, and December with 10-year averages totaling 24.9%, 43.7%, and 18% of the annual harvest, respectively.

Sitka black-tailed deer parturition typically occurs in May with late parturition occasionally delayed into mid or late-June for some females. Fawn dependency on does is greatest immediately following parturition when milk production and yield peaks (commonly between 10 to 37 days post parturition) and when milk demands by offspring are greatest. About a month after parturition, milk production begins to decrease as fawns begin to consume green forage. Thereafter, milk production continues to decrease as juvenile deer continue to consume more green forage relative to milk. Lactation and consumption of milk by fawns rarely extends past 120 days (4 months) when juvenile deer are weaned and become completely reliant on vegetative forage. Limiting or preventing harvest of female deer during late season hunts is likely to have minimal impact on “fawn” survival as juvenile deer are no longer dependent on does.

Currently, does are available for harvest under weapons-restricted hunts within the Kodiak Road System Management Area from Nov. 1–Nov. 14 and during a weapons-restricted youth hunt from Nov. 16 – Dec. 31. Does are also available for harvest by residents (3 deer bag limit) in the remainder hunt area from Oct. 1–Dec. 31. The department collects data on the sex of deer through harvest reports but does not collect fawn harvest data. Although the harvest of deer is an important consideration for management, hunter harvest is presumed to have minimal impact on the overall population size. There are no current biological concerns regarding the deer population on Kodiak.

The current federal subsistence season for Unit 8 deer has a bag limit of four deer and season dates of Aug. 1-Jan. 31; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal to reduce hunter opportunity by limiting female harvest during late season hunts. 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 240 – 5 AAC 85.060. Hunting seasons and bag limits for fur animals. Reduce the nonresident bag limit for fox in Unit 8 to 2, or to 2 for all hunters that use transporters, and prohibit the use of infrared for hunting any species in Unit 8.

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

PROPOSED BY: Alexis Kwachka

WHAT WOULD THE PROPOSAL DO? This proposal would limit any hunters who use a transporter to a bag limit of 2 foxes. The current bag limit for resident and nonresident hunters in Unit 8, regardless of use of commercial services, is 2 red foxes and 2 Arctic foxes. This proposal would also prohibit the use of night vision/infrared for hunting any species of game in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(2) Arctic fox (including white and blue phases)		
Unit 8	Sep. 1—Feb. 15	Sep. 1—Feb. 15
2 foxes		
...		
(3) Red fox (including cross, black, and silver phases)		
...		
Units 8–10, 14, 16, and 17	Sep. 1—Feb. 15 (general hunt only)	Sep. 1—Feb. 15
2 foxes		

There is a positive customary and traditional use determination for fox in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the current hunting bag limit for foxes to 2 foxes for any hunter using a transporter from the current bag limit for both residents and nonresidents of 2 red foxes and 2 Arctic foxes in Unit 8 regardless of transportation method. This proposal does not specify how the bag limit would be allocated between species (i.e. 1 red fox and 1 Arctic fox, 2 red fox, or 2 Arctic fox). This proposal would also prohibit the use of night vision/infrared for hunting any species of game in Unit 8 and may reduce fox harvest by hunters using this technology. However, due to the relatively recent approval of the regulation allowing the use of night vision to hunt furbearers statewide (March 2025), it is difficult to assess the impact of the proposed regulation on hunter success or furbearer populations.

BACKGROUND: At the 2025 Statewide Board of Game (board) meeting, the board adopted a proposal allowing the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide. This proposal took effect during the regulatory year (RY) RY25 hunting and trapping season and information regarding how this regulation impacts fox harvest has yet to be analyzed.

Archeological evidence indicates the only furbearers indigenous to the Kodiak Archipelago are red foxes (*Vulpes Vulpes*), river otters (*Lontra canadensis*), and short-tailed weasel (*Mustela erminae*; Rausch 1969). Healthy populations of all these furbearers now reside in the unit. Captive red, blue, and Arctic (*Vulpes* spp.) foxes escaped or were released from widespread fox farms in the early 1900s and have established populations since that time.

Red foxes are one of the most abundant furbearers on the archipelago. In 2015, the board adopted a hunting and trapping season for Arctic fox. The hunting season dates extend from Sep. 1– Feb 15. with a 2-fox bag limit, and the trapping season dates extend from Nov. 10–Mar. 31 with no bag limit. The department has no objective unitwide estimates of furbearer populations, although hunters and trappers report that fox populations along portions of the Kodiak road system regularly fluctuate. Fluctuations in fox abundance are likely related to fluctuations in prey abundance and trapping/hunting pressure on the road system.

Foxes are the most commonly pursued furbearer in Unit 8 but trapping and hunting fluctuate in popularity. The use of automated predator calls has become more prevalent in recent years, potentially resulting in an increase in fox harvest. Current methods of monitoring harvest through the ADF&G Trapper Questionnaire may underestimate take since sealing is not currently required for fox. The average annual harvest by trappers and hunters is estimated between 100–300 animals. Some harvested fox are home-tanned or dried for personal use and others are shipped off the island to tanneries.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal to limit the hunting bag limit for foxes because there is no conservation concern; limiting the bag limit based on transporter use is an additional level of complexity that does not currently exist in other hunting regulations, and the department is supportive of the use of night vision/infrared for trapping. 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 241 – 5 AAC 84.270. Furbearer trapping. Open a year-round trapping season for mink in Unit 8.

PROPOSED BY: Tyler Polum

WHAT WOULD THE PROPOSAL DO? This proposal would open a year-round trapping season for mink in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 84.270. Furbearer trapping.

Species and Units	Open Season	Bag Limit
...		
(7) Mink and weasel		
...		
Units 7, 8, and 14—16	Nov. 10—Jan. 31	No limit

There is a positive customary and traditional use determination for mink in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

There are no sealing requirements for mink anywhere in the state.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide year-round opportunities for trappers interested in pursuing mink in Unit 8. Although the impacts of mink on Kodiak’s local bird colonies remain unknown, mink have been shown to be detrimental to many bird populations, particularly ground/shore nesting birds. If adopted, Unit 8 will be the only place in Alaska where mink and weasel have different seasons; Mink are non-native to Kodiak Island while weasels are one of the 6 mammals native to the island.

BACKGROUND: Archeological evidence indicates the only furbearers indigenous to the Kodiak Archipelago are red foxes (*Vulpes Vulpes*), river otters (*Lontra canadensis*), and short-tailed weasel (*Mustela ermineae*; Rausch 1969). However, evidence suggests ground squirrels (*Spermophilus parryii*) may have been translocated to the archipelago from the Alaska Peninsula by indigenous peoples more than 4,000 years ago (Clark 2008). Healthy populations of the furbearers listed above now reside in the unit.

Mink are not native to Kodiak Island. After multiple failed attempts to purchase live-caught wild mink and release them in 3 locations in Alaska (Montague Island, Kodiak Island, Strait Island), the Alaska Game Commission and the U.S. Fish and Wildlife Service agreed to use farm-raised mink

obtained from the Petersburg Fur Experiment Farm for the transplants to the island. Following this decision, in 1952, 16 female and 8 male mink were brought to Kodiak Island and released near Karluk Lake in an effort to establish a harvestable mink population. After 2-3 years mink were no longer observed in the Karluk area and the introduction was considered a failure. Mink were believed to have been extirpated from the island around this time as no sightings or sign had been observed or documented following that brief 2-3 year period.

In the early 2000s there was interest from an individual on Kodiak Island to re-introduce mink to Kodiak to increase opportunities for fur trapping. This request to the Board of Game did not have much local support and was ultimately denied. However, a few years later, the department began receiving reports of mink sightings on the Kodiak road system and on nearby surrounding islands. Although it is difficult to determine how these mink arrived on Kodiak, these were the first documented sightings of mink on Kodiak Island in more than 50 years. Trappers and hunters continue to report observing mink. These reports have remained relatively consistent and seem to suggest the mink population has not noticeably increased island-wide. However, sightings and reports of mink observed specifically on the Kodiak road system have continued to slowly increase in recent years and mink have now been observed in more remote locations and communities on the road system (i.e., Village of Ouzinkie, White Sands Beach).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to open a year-round season for mink in Unit 8 because there are no conservation concerns for the population.

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

PROPOSAL 242 – 5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for river otter in Unit 8 by 2.5 months.

PROPOSED BY: Jessie Juhlin

WHAT WOULD THE PROPOSAL DO? This proposal would extend the trapping season for river/land otter in Unit 8 by 2.5 months from January 31 to end on April 15 .

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 84.270. Furbearer trapping.

Species and Units	Open Season	Bag Limit
...		
(9) Otter, land		
...		
Unit 8	Nov. 10—Jan. 31	No limit

There is a positive customary and traditional use determination for land/river otter (*Lontra canadensis*) in all units with a harvestable portion. The amount reasonably necessary for subsistence is 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would extending the trapping season for river/land otter in Unit 8 by 2.5 months to end April 15. The season currently closes January 31. Although river otter parturition dates are variable, extending the trapping season until April 15 may result in abandonment of newborn river otter pups if females are harvested during the late season. Further, extending the trapping season into mid-April will likely increase the harvest of parturient females.

BACKGROUND: Archeological evidence indicates the only furbearers indigenous to the Kodiak Archipelago are red foxes (*Vulpes Vulpes*), river (aka land) otters (*Lontra canadensis*), and short-tailed weasel (*Mustela erminae*; Rausch 1969). Although we have no objective estimates of furbearer populations for the unit, trappers report that most furbearer populations appear to be stable. Non-commercial trappers conduct most of the trapping in Unit 8. Trapping effort for river otters, beaver, and fox is typically affected by fluctuations in the fur market. Conversations with local trappers revealed most river otter, beaver, and fox pelts are exported for sale, while most other species are kept on the island for personal use or to sell locally. River otter harvest has been consistently decreasing over the past 10-15 years with an average 5-year annual harvest of 193 during regulatory year (RY) RY10–RY14, 101 during RY15–RY19, and 76 during RY20–24 (Table 242-1). The number of successful otter trappers has also decreased appreciably during this

time period from an average of 30 successful otter trappers during RY10–14, to 22 during RY15–19, and down to 18 successful otter trappers during RY20–24. November is commonly the most active month for fur trappers in Unit 8 although harvest chronology for river otters and beavers varies annually. Harvests are also documented through comprehensive subsistence household harvest surveys conducted by the Division of Subsistence. Table 242-2 shows land otter harvests for all study years and all Kodiak area communities.

River otters breed in spring (i.e., May) and exhibit delayed implantation in which the blastocyst (developing embryo) floats freely in the uterus for an extended period of time until implanting on the uterine wall thereby extending the gestation period. Implantation of the embryo is regulated by photoperiod with river otters in northern latitudes commonly initializing implantation in early to mid-February. Parturition commonly occurs from April to May when river otter pups are born requiring female care until about 5 months of age.

Table 242-1. Unit 8 river otter harvest during RY10–RY24 on Kodiak Island, Alaska.

Regulatory Year	No. Male	Percent Male	No. Female	Percent Female	No. Unknown	Total	Successful Trappers
RY10	68	54.8	56	45.2	2	126	26
RY11	57	63.3	33	36.7	39	129	26
RY12	65	39.2	101	60.8	22	188	26
RY13	148	41.8	206	58.2	6	360	38
RY14	58	40.3	86	59.7	19	163	32
RY15	81	50.3	80	49.7	5	166	32
RY16	62	49.2	64	50.8	5	131	29
RY17	36	57.1	27	42.9	1	64	17
RY18	35	47.9	38	52.1	1	74	18
RY19	43	61.4	27	38.6	1	71	16
RY20	49	62.8	29	37.2	2	80	19
RY21	15	60.0	10	40.0	77	102	17
RY22	43	53.8	37	46.3	9	89	24
RY23	32	60.4	21	39.6	6	59	16
RY24	15	57.7	11	42.3	26	52	13

Table 242-2. - Number of otter, land, harvested by Kodiak area communities, 1982-2022.

	Kodiak (Road)	Ouzinkie	Port Lions	Akhiok	Old Harbor	Larsen Bay	Karluk	Total otter harvested
1982	0	15	0	0	59	0	10	84
1986	-	27	89	0	19	1	3	139
1989	-	0	7	0	0	26	5	38
1990	-	0	-	-	-	0	0	0
1991	125	0	-	-	0	24	0	149
1992	0	0	-	0	-	0	-	0
1993	76	0	5	-	-	2	-	83
1997	-	0	-	-	0	2	-	2
2003	-	11	1	0	1	0	0	13
2018	-	-	-	0	22	0	-	22
2021	11	-	-	-	-	-	-	11
2022	-	0	0	-	-	-	-	0

- No survey conducted for this year

Source: Community Subsistence Information System

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to extend the river otter trapping season in Unit 8 because there are no conservation concerns for river otter in Unit 8. However, if adopted, the proposal will increase harvest, including females.

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

PROPOSAL 243 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require all snares set in the Kodiak road system area to be equipped with a breakaway mechanism.

PROPOSED BY: The Humane Society of Kodiak

WHAT WOULD THE PROPOSAL DO? This proposal would require all snares on the Kodiak road system to have a breakaway mechanism (of a designated minimum poundage) on the loop end of the snare. The snare cable and anchor must be stronger than the breakaway mechanism.

WHAT ARE THE CURRENT REGULATIONS? There are no regulations specific to the use of snares in Unit 8.

There is a positive customary and traditional use finding for furbearers in Unit 8 with an amount reasonably necessary of 90% of the harvestable portion of the population.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would require all snares set on the Kodiak road system to be outfitted with a breakaway mechanism. The intent of the proposal is to reduce the number of non-target species captured and reduce the severity of injuries to non-target species when they escape the snare. Trappers would be required to outfit all snares with breakaway mechanisms which may be time consuming and require additional costs. Presumed costs are anticipated to be minimal as most breakaway mechanisms are relatively inexpensive.

BACKGROUND: Snaring is one of the oldest methods used to capture wild animals and has evolved significantly with the creation of braided cable, swivels, locking mechanisms, and other components to increase efficiency and productivity. In some areas the use of snares has been restricted due to public concern over snares capturing non-target species. In response to these concerns, there has been a recognized need and an effort to develop and improve breakaway mechanisms to avoid catching and possible injury to non-target species.

On Kodiak Island, the trapping season is open year-round for some species (squirrel, marmot), but most trapping, particularly snaring, occurs in November, December, and January when fox, beaver, and river otter seasons are open and fur is prime. Despite most snaring occurring during the fall and winter months, over the past 10 years the department has received multiple calls of nontarget species (e.g., dogs, bears, deer) caught in snares initially set to capture fox. Since 2016, the department has observed and/or handled 2 bears and 4 deer caught in snares and has dispatched 2 additional bears due to significant injuries inflicted by snares not equipped with breakaway mechanisms. The department also receives complaints of domestic animals caught in snares along the Kodiak road system, particularly in popular, high traffic areas. Although trapping and snaring is a popular pastime for many residents of Kodiak, recent incidents along the Kodiak road system have resulted in public discussion on adopting additional regulations that provide a safety mechanism for non-target species caught in snares on the Kodiak road system.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this methods and means proposal to require all snares set on the Kodiak road system to include breakaway mechanisms. To meet the Board of Game’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 244 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags on traps and snares set along the Kodiak road system.

PROPOSED BY: The Humane Society of Kodiak

WHAT WOULD THE PROPOSAL DO? This proposal will require trappers to mark, with an identification (ID) tag, all traps and snares set along the Kodiak road system.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game (board) does not currently have any trap marking requirements in Alaska.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will require additional effort for trappers to mark traps and snares, and may result in a nominal increase in expenses to refit traps and snares with ID tags.

BACKGROUND: The board previously adopted proposals to mark snares in Units 12 and 20E (2001) and all traps and snares in Units 1-5 (2003). The requirement to mark a snare was implemented in Regulatory Year (RY) 2001 for Unit 12 and 20E and in RY2003 for units 1–5. The board originally enacted the requirement to mark a snare in Units 12 and 20E to address local enforcement issues related to snare sets left in the field following the closure of the wolf trapping season. The original proposal included a sunset clause of 2 years but was reinstated by the board in 2002 without the sunset because of overall positive support from local trappers and law enforcement. Wolf trapping along major roadways is common in Units 12 and 20E. When these animals are caught in sight of the road, the marking requirement has allowed the department and troopers to contact trappers before public complaints escalate.

The board adopted the requirement for marking traps and snares in units 1-5 to address many of the same issues as identified in interior region units. This regulation was later repealed at a statewide board meeting.

A similar proposal was submitted as a statewide proposal and was considered at the March 21-28, 2025 board meeting (Proposal 131), the proposal failed 1-6. The department was neutral on the statewide proposal and recommended the board address area specific issues on a case-by-case basis.

Conflicts between trappers and non-consumptive users occur periodically in Unit 8. The bulk of such conflicts occur along multi-use trails on the Kodiak road system. There are also occasionally issues involving the capture of non-target game species (bears and deer) and domestic animals.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because there is no conservation issue. The desire for identification of traps in the field is used primarily for enforcement purposes. Gear identification is used in other resource management approaches; for example, fishers are required to mark buoys attached to pots to identify the owner or vessel in

some fisheries. If adopted, trappers would need to affix ID tags to all trapping gear. 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 245 – 5 AAC 92.080. Unlawful methods of taking big game; exceptions.

Prohibit the use of artificial light and infrared/heat signatures optics for hunting big game or trapping small game in Unit 8.

PROPOSED BY: Stig Yngve

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the take of big game or small game with the aid of artificial light or a forward looking infrared device through hunting or trapping in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

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

...

(7) with the aid of

...

(C) artificial light, except that artificial light may be used

(i) for the purpose of taking furbearers under a trapping license during an open season November 1 – March 31 in Units 7 and 9-26;

(ii) by a tracking dog handler with one leashed dog to aid in tracking and dispatching a wounded big game animal;

(iii) to aid in tracking, recovering, and dispatching a wounded game animal without the use of a motorized vehicle;

...

(F) a forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers.

There is a positive customary and traditional use finding for furbearers in Unit 8 with an amount reasonably necessary for subsistence use (ANS) of 90% of the harvestable portion of the population.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The use of artificial light to take game in Unit 8 is currently prohibited, except in the 2 instances noted above regarding tracking and recovering wounded game. A forward looking infrared device may only be used to aid in the taking of furbearers with an Alaska trapping license. The adoption of this proposal would eliminate the use of artificial light or an infrared device while trapping foxes.

BACKGROUND: There are various categories of game defined in regulation, this includes big game, small game, fur animals, and furbearers. Big game, small game, and fur animals are only legal for take with an Alaska hunting license. Furbearers may only be taken with an Alaska trapping license.

The take of game with the aid of artificial light, electronically enhanced night vision, or a forward looking infrared device with an Alaska hunting license in Unit 8 is currently prohibited.

At the 2025 Statewide Board of Game (board) meeting the board adopted a proposal submitted by members of the public allowing the use of electronically enhanced night vision and forward looking infrared devices to take furbearers statewide. This proposal took effect during regulatory year (RY) RY25 and information regarding how this regulation impacts furbearer populations has yet to be determined.

DEPARTMENT COMMENTS: The department is **OPPOSED** to prohibiting the use of forward looking infrared devices to aid in the take of furbearers when there is no conservation concern. This proposal introduces regulatory complexity in the form of inconsistent regulations, and the department is supportive of the use of this technology for trapping.

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

PROPOSAL 246 – 5 AAC 92.080. Unlawful methods of taking big game; exceptions.

Prohibit hunting with infrared devices in Unit 8.

PROPOSED BY: Alexis Kwachka

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the take of game through hunting with the aid of a forward looking infrared devices in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

It is currently not legal to take game under hunting regulations with forward looking infrared technology.

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

...

(7) with the aid of

...

(F) a forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers.

There is a positive customary and traditional use finding for furbearers in Unit 8 with an amount reasonably necessary for subsistence uses of 90% of the harvestable portion of the population.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A forward looking infrared device may only be used to aid in the taking of furbearers with an Alaska trapping license. The proposed regulations are consistent with those in 5 AAC 92.080 and the adoption of this proposal would have no effect on current regulations.

BACKGROUND: There are various categories of game defined in regulation, this includes big game, small game, fur animals and furbearers. Big game, small game and fur animals are only legal for take with an Alaska hunting license. Furbearers are only legal for take with an Alaska trapping license.

The take of game with the aid of artificial light, electronically enhanced night vision, or a forward looking infrared device with an Alaska hunting license in Unit 8 is currently prohibited.

At the 2025 Statewide Board of Game (board) meeting the board adopted a proposal submitted by members of the public allowing the use of electronically enhanced night vision and forward-looking infrared devices to take furbearers statewide. This proposal took effect during regulatory year (RY) RY25 and information regarding how this regulation impacts furbearer populations has yet to be determined.

DEPARTMENT COMMENTS: The department is **OPPOSED** to prohibiting the use of forward looking infrared devices to aid in the take of furbearers. It is currently not legal to hunt with forward looking infrared devices.

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

PROPOSAL 247 – 5 AAC 92.080. Unlawful methods of taking big game; exceptions. Allow the use of artificial light to take foxes during open trapping seasons in Unit 8.

PROPOSED BY: Taj Shoemaker

WHAT WOULD THE PROPOSAL DO? This proposal would allow the take of fox with the aid of artificial light with an Alaska trapping license in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

The fox trapping season in Unit 8 is November 1 – March 31, and there is no bag limit.

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking Game are prohibited

...

(7) with the aid of

...

(C) artificial light, except that artificial light may be used

(i) for the purpose of taking furbearers under a trapping license during an open season November 1 – March 31 in Units 7 and 9 – 26;

There is a positive customary and traditional use finding for furbearers in Unit 8 with an amount reasonably necessary for subsistence of 90% of the harvestable portion of the population.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would allow the take of fox with the aid of artificial light with an Alaska trapping license in Unit 8.

BACKGROUND: Archeological evidence indicates the only furbearers indigenous to the Kodiak Archipelago are red foxes (*Vulpes Vulpes*), river otters (*Lontra canadensis*), and short-tailed weasel (*Mustela erminae*; Rausch 1969). However, evidence suggests ground squirrels (*Spermophilus parryii*) may have been translocated to the archipelago from the Alaska Peninsula by indigenous peoples more than 4,000 years ago (Clark 2008). Healthy populations of the furbearers listed above, except mink, now reside in the unit. Captive red, blue and arctic (*Vulpes* spp.) foxes escaped or were released from widespread fox farms in the early 1900s.

Red foxes are one of the most abundant furbearers on the archipelago and in 2015, the Board of Game (board) adopted a hunting and trapping season for Arctic fox. The hunting season dates extend from September 1–February 15. with a bag limit of 2 fox, and the trapping season dates extend from November 10–March 31 with no bag limit. There are no objective unit-wide estimates of furbearer populations although hunters and trappers report fox populations along portions of the Kodiak road system regularly fluctuate. Fluctuations in fox abundance are likely related to fluctuations in prey abundance and trapping/hunting pressure on the road system.

Foxes are the most commonly pursued furbearer in Unit 8 but trapping and hunting appears to fluctuate in popularity. The use of automated predator calls has become more prevalent in recent years, potentially resulting in an increase in fox harvest. Current methods of monitoring harvest may underestimate take since there is no permitting, reporting or sealing requirement for fox in Unit 8. The average annual harvest by trappers and hunters is estimated between 100–300 foxes through the ADF&G Trapper Questionnaire.

At the 2025 Statewide Board of Game meeting the board adopted a proposal submitted by members of the public allowing the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide. This proposal took effect during the regulatory year (RY) RY25 hunting and trapping season and information regarding how this regulation impacts fox populations has yet to be determined.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal to allow the use of artificial light for taking fox under a trapping license in Unit 8, which is currently allowed in Units 7, and 9-26.

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

PROPOSAL 248 – 5 AAC 92.080. Unlawful methods of taking big game; exceptions.

Prohibit the take of furbearers with the aid of electronically enhanced night vision and forward looking infrared devices in Unit 8.

PROPOSED BY: Rebecca Skinner

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the take of furbearers with the aid of electronically enhanced night vision or a forward-looking infrared device with an Alaska trapping license in Unit 8.

WHAT ARE THE CURRENT REGULATIONS?

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

...

(7) with the aid of

...

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers.

(F) a forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers.

There is a positive customary and traditional use finding for furbearers in Unit 8 with an amount reasonably necessary for subsistence uses of 90% of the harvestable portion of the population.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would prohibit the take of furbearers with the aid of electronically enhanced night vision or a forward looking infrared device with an Alaska trapping license in Unit 8. If adopted, this proposal would align harvest restrictions for furbearers with all other game species in Unit 8.

BACKGROUND: There are various categories of game defined in regulation, including big game, small game, fur animals and furbearers. Big game, small game and fur animals are only legal for take with an Alaska hunting license. Furbearers are only legal for take with an Alaska trapping license. Unit 8 furbearer species include; beaver, arctic fox, red fox, marten, mink, short-tailed weasel, muskrat, river otter, red squirrels and ground squirrels. There are no conservation concerns for any furbearer population in Unit 8.

At the 2025 Statewide Board of Game (board) meeting the board adopted a proposal submitted by members of the public allowing the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide. This proposal took effect during RY25 and information regarding how this regulation impacts furbearer populations has yet to be determined.

DEPARTMENT COMMENTS: The department is **OPPOSED** to prohibiting the use of electronically enhancing night vision and forward looking infrared devices to aid in the take of furbearers, and is supportive of the use of this technology for trapping. While this proposal would align regulations for all game species in Unit 8, adoption would eliminate a currently authorized method and means.

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