

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS 19-22, 26, 31-33, 44-46, 53-54 and 63
SOUTHEAST REGION REGULATIONS PROPOSALS
ALASKA BOARD OF GAME MEETING
WRANGELL, ALASKA
JANUARY 23-27, 2026



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, January 23-27, 2026 in Wrangell, 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 19 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend RB089 (inside drainages) brown bear hunting season to May 31 for residents only as follows:

<u>Residents</u> [residents and nonresidents]	<u>Hunt</u>	<u>Dates</u>
One bear every four regulatory years	RB089 [RB/DB089]	Mar. 15 – [May 20] May 31

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would extend the RB089 brown bear hunting season closure date for residents only by 11 days, from May 20 to May 31.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

<u>Residents and nonresidents</u>	<u>Hunts</u>	<u>Dates</u>
One bear every four regulatory years	RB/DB089	Mar. 15 – May 20

RB/DB089 (inside drainages): Remainder of Unit 4. (Figure 1)

The Alaska Board of Game (BOG) has made a positive customary and traditional use finding for brown bears in Unit 4 and has determined an amount reasonably necessary for subsistence of 5 – 10 bears annually.

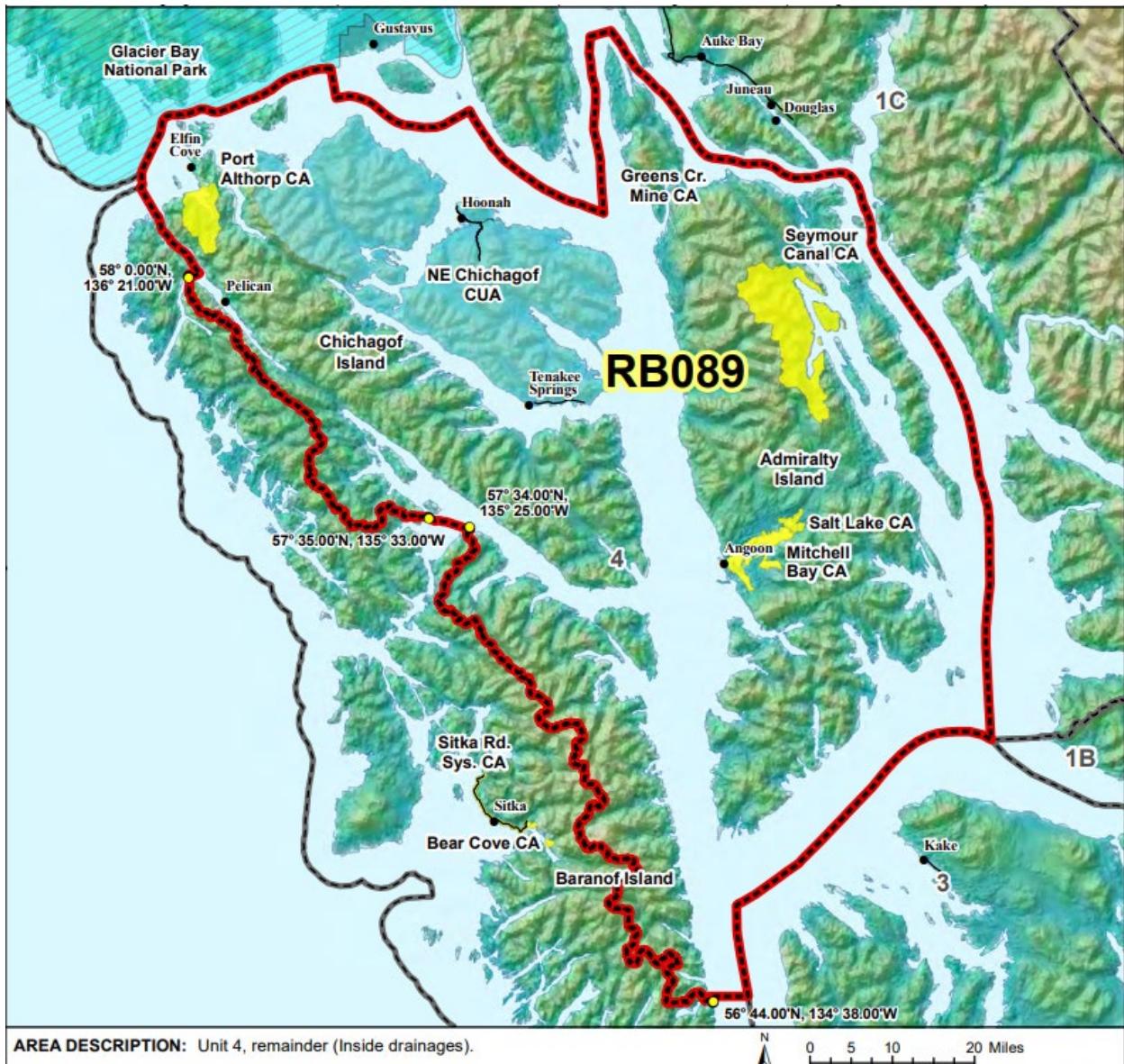


Figure 1. Current RB/DB089 Boundary in Game Management Unit 4 (closed areas in yellow).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal, if adopted, would increase the length of the RB089 brown bear season by 11 days for residents only. The peak time-period for harvesting a brown bear in Unit 4 is May 11 – 20. During this 10-day period, approximately 50% of the spring harvest occurs. Favorable weather conditions and increasing bear rut activity contribute to this. Of the total Unit 4 spring harvest, >80% comes from the RB089 hunt, despite being 11 days shorter than RB088. Nonresident harvest is approximately 75% of both the total Unit 4 bear harvest and the RB089 harvest. Over the past decade (RY15 – RY24) the RB089 annual harvest has averaged approximately 67 bears, of which about 17 are taken by residents. Nonresident hunters harvest approximately 90% males, residents approximately 65% males. While it is difficult to predict actual increased harvest, the

longer season length has the potential to increase brown bear harvest as resident hunters would likely take advantage of this additional opportunity during this period of peak bear activity without having to compete with guided nonresident hunters.

In spring 2020, the spring nonresident bear season was closed due to the Covid-19 pandemic. That spring, resident harvest was 53% higher (32 bears) than the 10-year average (21 bears) (RY15 - RY24 excluding 2020). Unlike nonresident hunts which are limited by guide use authorizations, the overall number of resident hunts is not limited. Although harvest is likely to increase, the department does not anticipate a biological or conservation concern since the overall Unit 4 bear harvest has been about 40 bears below guideline harvest levels for the past decade (Table 1). Residents do harvest a higher percentage of females than nonresidents, but the proportion is still below the management objective (3:2).

BACKGROUND: The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. This is a comprehensive management plan developed in 2000 to address the needs of multiple interest groups, both consumptive and non-consumptive. Under this plan, the Guideline Harvest Level (GHL) for human caused mortality is 4% of the most recent population estimate. The guidelines in the plan, along with current seasons and bag limits, have been successful in providing a sustainable brown bear harvest while also providing high quality bear viewing opportunities. Changing the hunt dates in Unit 4 could result in increased conflicts in the field between user groups. A multi-user group plan was developed by stakeholders to reduce conflicts based on known dates and areas; a change in hunting season introduces a change to that agreement. Because the BBMS involved various stakeholder groups to come to management consensus, it may be inappropriate to make major changes in the hunt structure without reconvening the Brown Bear Management Team. The BBMS was most recently reaffirmed by BOG in 2013.

The current hunt areas and dates (inside and outside drainages) have been in place for 45 years. The BOG first implemented these regulations by emergency order in April 1979 for the spring season and, subsequently, through regular board action for that fall season. These changes were implemented because of concerns that bear populations were in decline on Admiralty Island and in the more accessible areas of Baranof and Chichagof islands (inside drainages). The outside drainages area of Unit 4 (RB088) has an additional 11 days of spring hunting opportunity compared to the rest of Unit 4. This area is generally more difficult to access and has less hunting pressure. During the last 10 regulatory years (RY15 – RY24), the inside drainage has accounted for >80% of the spring harvest despite the season being 11 days shorter. Currently bear populations in Unit 4 appear stable and harvest has been below GHLs (Table 1). Through the BBMS, the number of registered guides in Unit 4 is capped at 20, which has mitigated most conservation concerns.

Table 1. The Brown Bear Management Strategy guidelines for human-caused mortality along with the 10-year average human-caused mortality, regulatory year 2015 – 2024 in Unit 4, Alaska.

	<i>BBMS Guideline Mortality</i>		<i>Human-caused Mortality, 2015-2024 (10-Year Average)</i>	
ISLAND	Total Bears	Female	Total Bears	Female
Admiralty	62	23	44	6
Baranof	42	16	37	11
NE Chichagof	18	7	13	3
Chichagof (Remainder)	50	19	36	5
Total	172	65	130	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. While it is likely that there will be increased harvest for all user groups if the proposal passes, human caused mortality as well as female harvest has been well below GHLs for all of Unit 4 over the last decade. Current hunt areas, seasons, and guideline mortality levels provide for sustainable harvest. The proposal could result in user group conflicts which are allocative in nature. As noted a multi-use group agreement was reached by stakeholders to reduce conflicts between consumptive and nonconsumptive resource uses. The department cautions about making changes to long-standing brown bear regulations without input from the Brown Bear Management Team.

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

PROPOSAL 20 – 5 AAC: 85.020. Hunting seasons and bag limits for brown bear. Change hunt boundaries of RB/DB088 and DB/RB089 to include all of Lisianski Inlet drainage within RB/DB088 as follows:

RB/DB088 (outside drainages). From Point Lucan outside of the Port Althorp closed area, following the ridge of the Althorp Peninsula along the common boundary of GUA (Guide Use Area) 04-15, the area includes Chichagof Island south and west of a line that follows the island's crest to coordinates (57.82701, -135.86404), then to (57.79173, -135.99264), continuing south and west along the island crest to Point Nismeni (57°34' N. lat., 135°25' W. long.), and then to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.) This includes Yakobi Island, Kruzof Island, and other adjacent islands, as well as the drainages into Gut Bay.

PROPOSED BY: Zach Decker

WHAT WOULD THE PROPOSAL DO? This proposal would change the RB/DB088 and RB/DB089 brown bear hunt boundaries to include all of the Lisianski Inlet drainage in RB/DB088. This would change the season closure date in this area from May 20 to May 31, extending the season by 11 days.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

<u>Residents and nonresidents</u>	<u>Hunts</u>	<u>Dates</u>
One bear every four regulatory years	RB/DB088	Mar. 15 – May 31
	RB/DB089	Mar. 15 – May 20

RB/DB088 (outside drainages): Chichagof Island south and west of a line that follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W. long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long.), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.), including Kruzof and other adjacent islands. (Figure 1).

RB/DB089 (inside drainages): Remainder of Unit 4.

The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. Under the BBMS Chichagof Island (excluding NE Chichagof Island east of Port Frederick and north of Tenakee Inlet) has a guideline mortality level of 50 bears (19 females) annually.

The Alaska Board of Game (BOG) made a positive customary and traditional use finding for brown bears in Unit 4 and determined an amount reasonably necessary for subsistence of 5 – 10 bears annually.

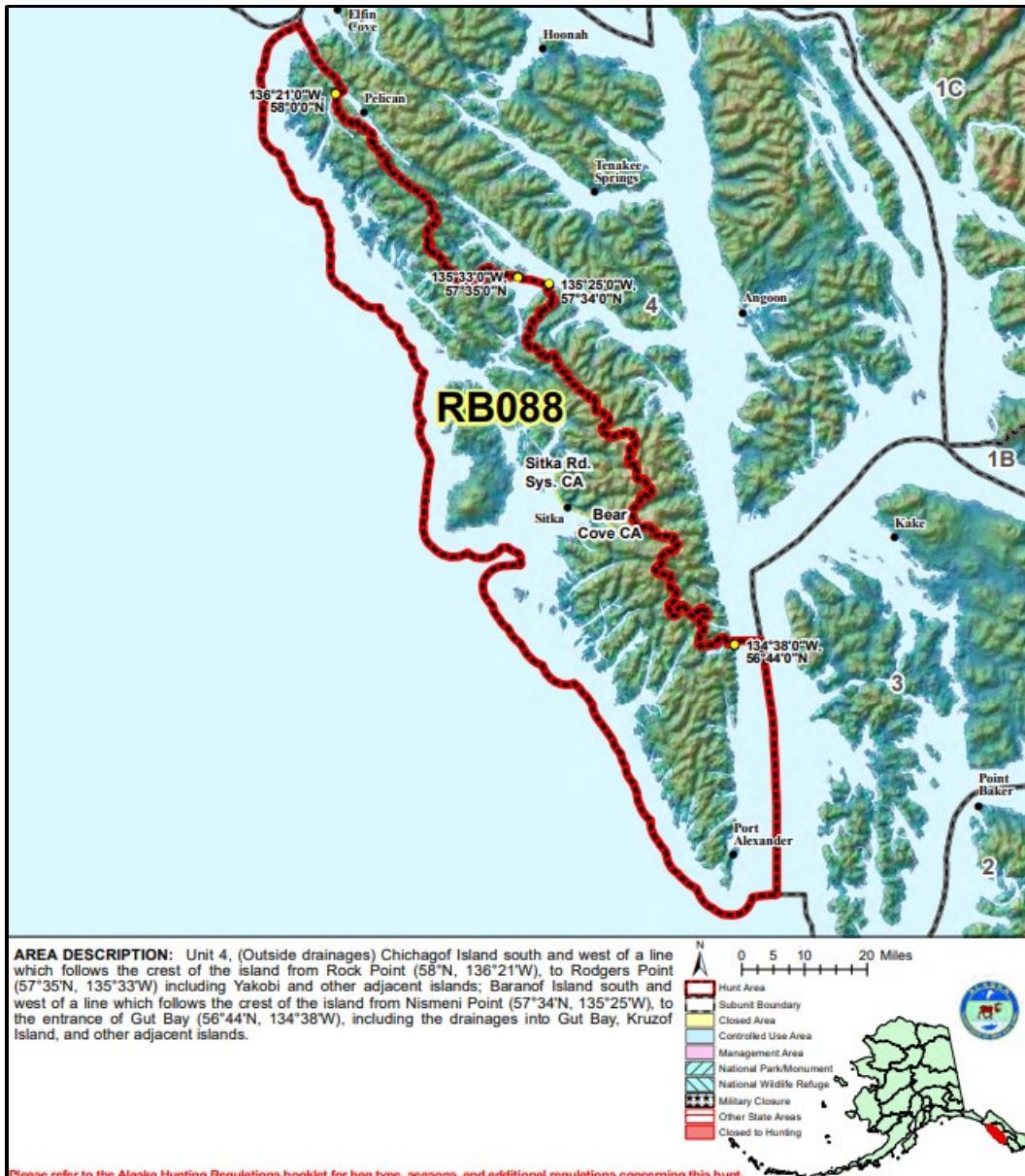


Figure 1. Current RB/DB088 hunt boundary.



Figure 2. RB/DB088 boundary in Game Management Unit 4 (blue shaded) with proposed expansion (pink shaded).

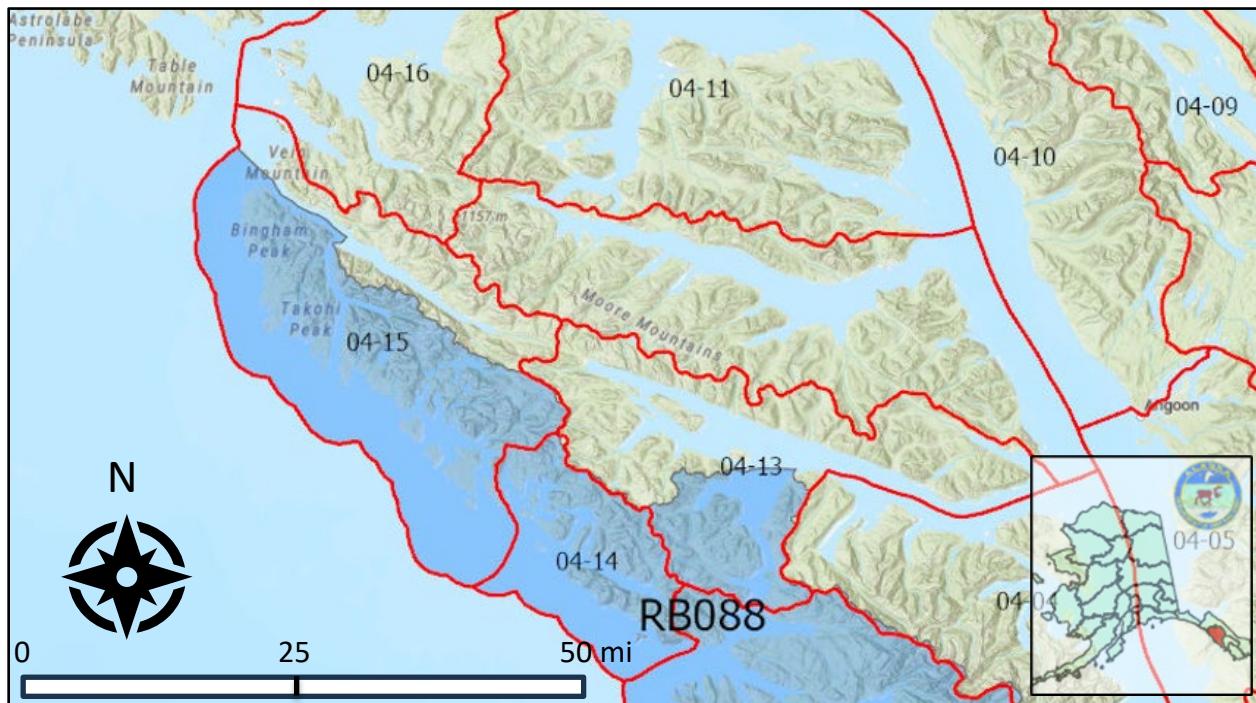


Figure 3. Map showing current guide use area boundaries. Proposed RB/DB088 boundary would be northern boundary of 04-15 to where it intersects 04-13 and 04-14.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the length of the brown bear season in Lisianski Inlet by 11 days for both residents and nonresidents. The peak time-period for harvesting a brown bear in Unit 4 is May 11 – 20. During this 10-day period, 50% of the spring harvest occurs. Increasing the season length will likely increase brown bear harvest in this watershed by 1–5 bears as guides and resident hunters would take advantage of this additional opportunity during this period of peak bear activity. For example, guides could opt to switch less successful early season hunts in April to this more productive period. There are currently only two guide operations with authorizations to conduct up to 30 hunts annually (24 and 6, respectively) in Guide Use Area 04-15. As a result, there will likely be little effect on the total Unit 4 brown bear harvest since the overall number of hunts that guides conduct would not change and because this is such a small area.

BACKGROUND: Chichagof Island Remainder (excluding NE Chichagof Island east of Port Frederick and north of Tenakee Inlet) is managed under the Unit 4 Brown Bear Management Strategy (BBMS) as part of a four-island strategy (Admiralty, Baranof, Northeast Chichagof and Remainder of Chichagof). This is a comprehensive management plan developed in 2000 to address the needs of multiple interest groups, both consumptive and non-consumptive. Under this plan, the Guideline Harvest Level (GHL) for human-caused mortality in Unit 4 is 4% of the most recent population estimate. The most current population estimate (from 2002) for Chichagof Island Remainder is 1,250 bears. The current GHL for Chichagof Island Remainder is 50 bears. Human caused mortality has averaged 35 bears (30 male, 5 female) over the past decade (RY15 – RY24). Harvest is minimal in Lisianski Inlet and averages 1 bear annually.

The current hunt areas and dates (inside and outside drainages) have been in place for 45 years. The BOG first implemented these regulations by emergency order in April 1979 for the spring season and subsequently through regular board action for that fall. These changes were implemented over concerns that bear populations were in decline on Admiralty Island and more accessible areas of Baranof and Chichagof Islands (inside drainages). The spring hunting season is 11 days longer in the outside drainages of Unit 4 than the inside drainages. This area is generally more difficult to access and receives less hunting pressure. During the last 10 regulatory years (RY15 – RY24) the inside drainages have accounted for 80% of the spring harvest despite the season being 11 days shorter.

In 2000, the BOG adopted the Unit 4 BBMS. The BBMS is a comprehensive plan that addresses both consumptive and non-consumptive uses of brown bears. The guidelines in the plan along with current seasons and bag limits have been successful in providing a sustainable brown bear harvest while also providing high quality bear viewing opportunities. Changing the hunt boundaries in Unit 4 could result in increased conflicts in the field between user groups. A multi-user group plan was developed by stakeholders to reduce conflicts based on known dates and areas; a change in hunting season introduces a change to that agreement. Because the BBMS involved various stakeholder groups to come to management consensus, it may be inappropriate

to make changes in the hunt structure without reconvening the Brown Bear Management Team. The BBMS was last reaffirmed by the BOG in 2013.

In January 2018, the U.S. Forest Service (USFS) began facilitating a collaborative process between big game hunting guides and the small cruise ship industry to reduce crowding and conflicts in the field. A best management practices agreement (BMP), Shoreline II, was finalized in March 2020. Extending the brown bear hunting season in Lisianski Inlet could have implications for that agreement, though the author of this proposal points out that the nearby Port Althorp closed area provides bear viewing opportunities in line with the BBMS and the USFS Shoreline II BMP.

The author's stated purpose for this proposal is to align the GUA 04-15 boundary with the RB/DB088 hunt boundary to simplify hunt boundaries, improve safety during inclement weather, and allow hunters more flexibility and opportunity in this area.

The same proposal was submitted for consideration and failed at the January 2023 BOG meeting because the board did not want to make changes to the long-standing BBMS, which provides the desired balance between hunting and viewing.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. While it is likely that there will be a slight increase in harvest from Lisianski Inlet if the proposal passes, it is a small area and unlikely to cause a biological concern. However, user conflicts could result, and the department cautions about making changes to long-standing brown bear regulations without input from the Brown Bear Management Team. As noted a multi-use group agreement was reached by stakeholders to reduce conflicts between consumptive and nonconsumptive resource uses.

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

PROPOSAL 21 – 5 AAC: 85.020. Hunting seasons and bag limits for brown bear. Change hunt boundaries of RB/DB088 and DB/RB089 to include Northeast Chichagof Island within RB/DB088 as follows:

RB/DB088 (outside drainages). Chichagof Island East Point (57.80°N, 134.94°W) following the common Guide Use Area line of 04-11 to 58.02°N, 135.96°W to 57.96°N, 136.09°W following the Guide Use Line of 04-15 to include Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long.), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.), including Kruzof and other adjacent islands.

PROPOSED BY: Alisha Rosenbruch-Decker

WHAT WOULD THE PROPOSAL DO? This proposal would change the RB/DB088 and RB/DB089 brown bear hunt boundaries to include parts of Northeast Chichagof Island and the Lisianski Strait area in RB/DB088. This would change the season closure date in this area from May 20 to May 31, extending the season by 11 days.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

<u>Residents and nonresidents</u>	<u>Hunts</u>	<u>Dates</u>
One bear every four regulatory years	RB/DB088	Mar. 15 – May 31
	RB/DB089	Mar. 15 – May 20

RB/DB088 (outside drainages): Chichagof Island south and west of a line that follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W. long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long.), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.), including Kruzof and other adjacent islands (Figure 1).

RB/DB089 (inside drainages): Remainder of Unit 4. (Figure 2)

Under BBMS Chichagof Island east of Port Frederick and north of Tenakee Inlet has a guideline mortality level of 18 bears (7 female) annually.

The Alaska Board of Game (BOG) has made a positive customary and traditional use finding for brown bears in Unit 4 and determined an amount reasonably necessary for subsistence of 5 – 10 bears annually.

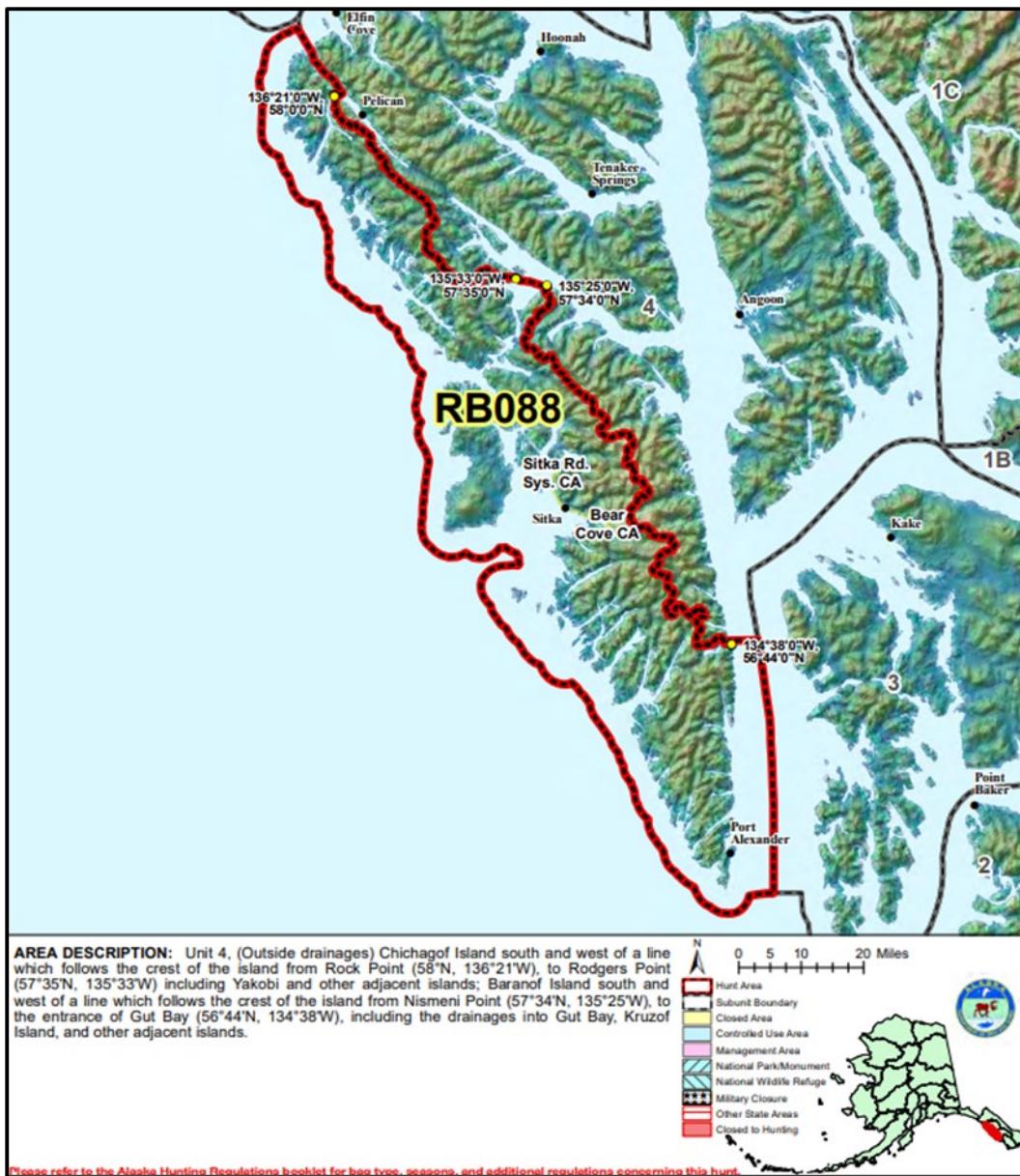


Figure 1. Current RB/DB088 boundary in Game Management Unit 4.

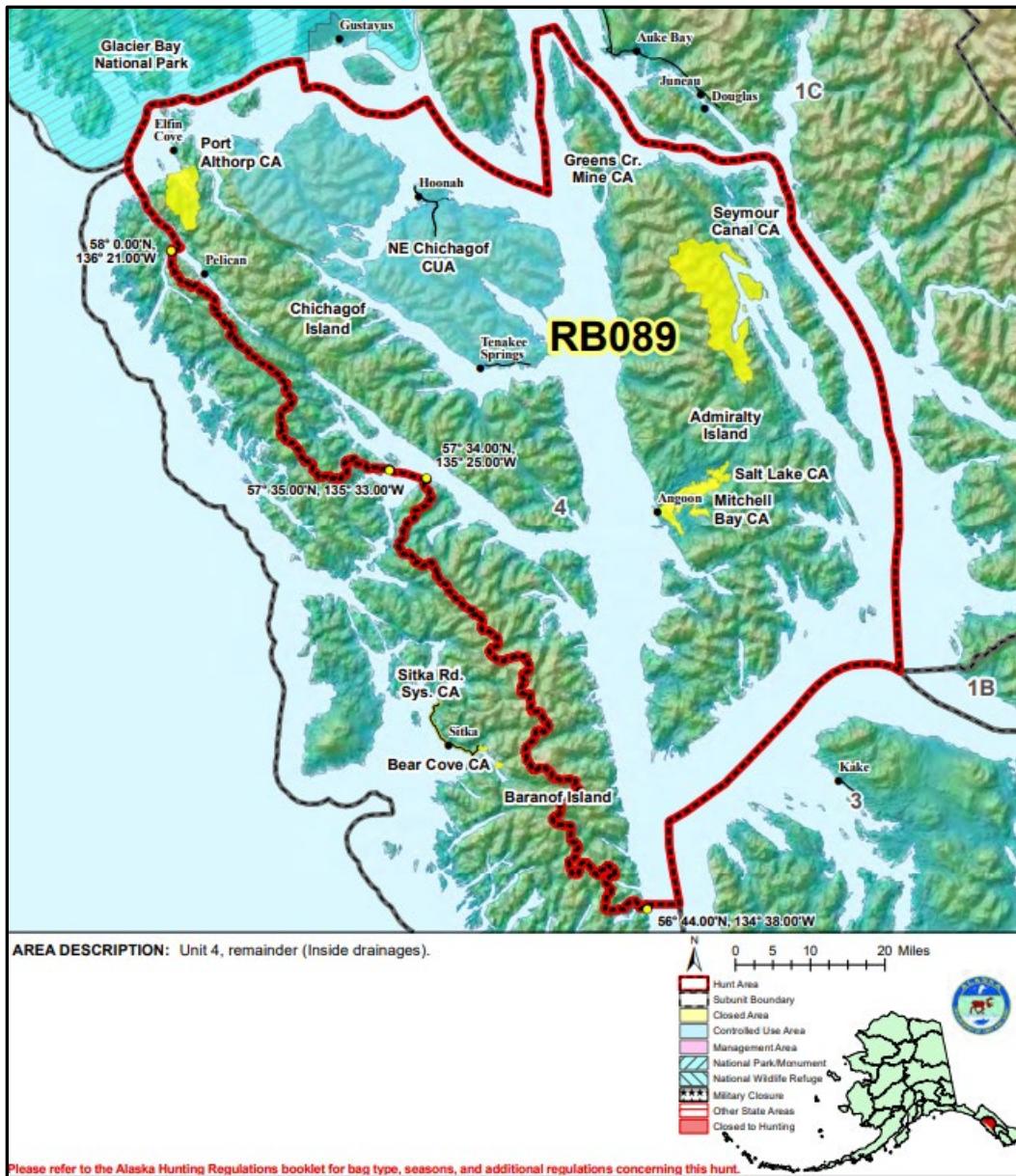


Figure 2. Current RB/DB089 boundary in Game Management Unit 4 (closed areas in yellow).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The proposed boundary line would follow portions of current Guide Use Area (GUA) boundaries (Figure 3). If adopted, this proposal would put GUA 04-11, 04-16 and a portion of 04-15 within the RB088 hunt area. As such, it would increase the length of the brown bear season in a large and highly accessible portion of Unit 4 by 11 days. Most notably affected would be Northeast Chichagof Island but also the Lisianski Strait area that is addressed in Proposal 20. The peak time-period for harvesting a brown bear in Unit 4 is May 11 – 20. During this 10-day period, 50% of the spring harvest occurs. While it is difficult to predict actual increased harvest, the longer season length has the potential to increase brown bear harvest as guides and resident

hunters take advantage of this additional opportunity during this period of peak bear activity. For example, guides could opt to switch less successful early season hunts in April to this more productive period and area. There are currently three guide operations with authorizations to conduct up to 34 hunts in Guide Use Areas 04-11, 04-15, and 04-16 (24, 6 and 4 hunts, respectively). The overall number of hunts that guides could conduct in Unit 4 would not change, but success rates could increase.

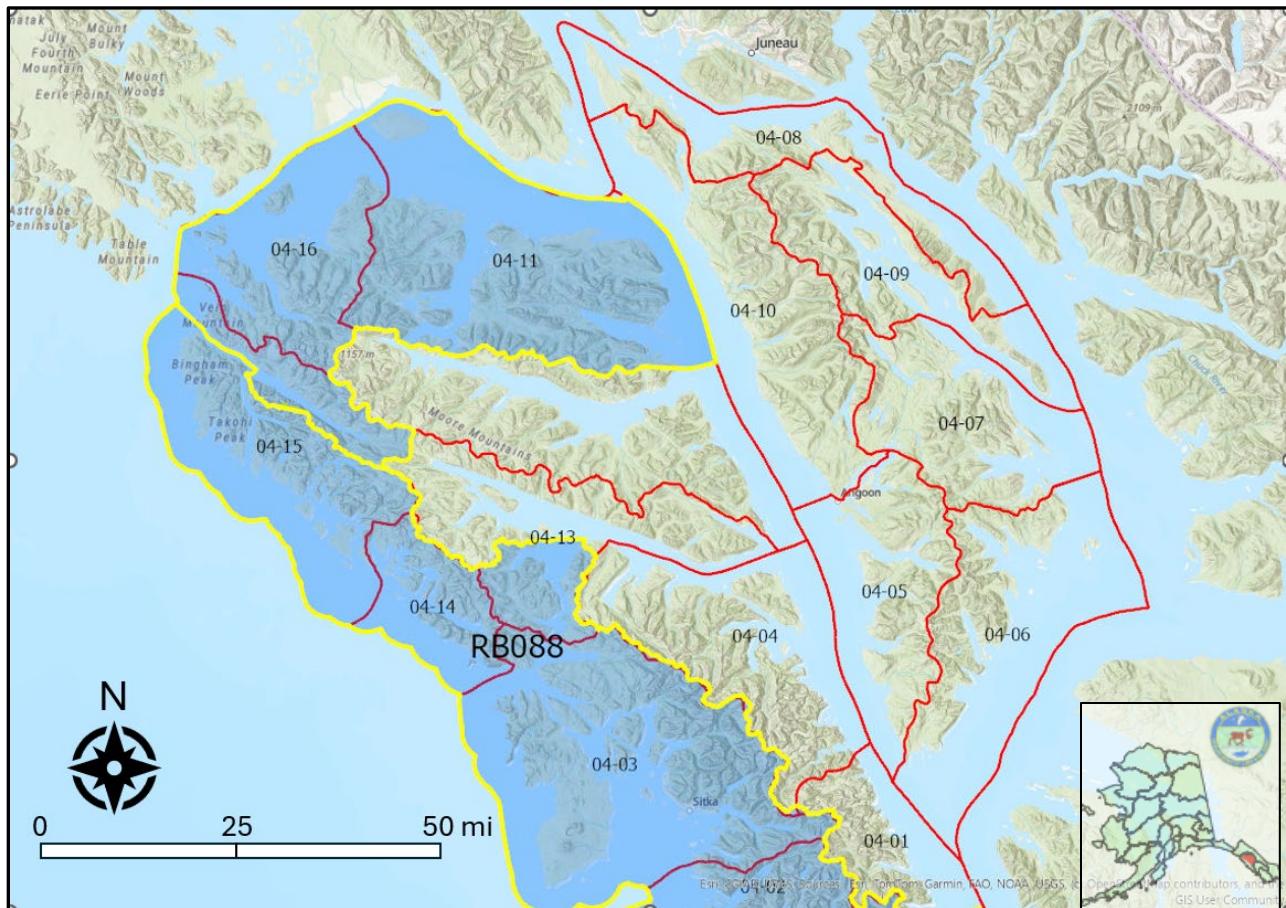


Figure 3. Proposed RB/DB088 boundary (blue shaded) incorporating NE Chichagof Island and using Guide Use Area boundaries.

BACKGROUND: Northeast Chichagof Island is managed under the Unit 4 Brown Bear Management Strategy (BBMS) as part of a four-island strategy (Admiralty, Baranof, Northeast Chichagof and Remainder of Chichagof). This is a comprehensive management plan developed in 2000 to address the needs of multiple interest groups both consumptive and non-consumptive. Under this plan, the Guideline Harvest Level (GHL) for human caused mortality is 4% of the most recent population estimate. The most current population estimate for Northeast Chichagof Island is 450 bears. The current GHL for Northeast Chichagof Island is 18 bears (7 female). Human caused mortality has averaged 13 bears (10 male, 3 female) over the past decade (RY15 – RY24).

The current hunt areas and dates (inside and outside drainages) have been in place for 45 years. The BOG first implemented these regulations by emergency order in April 1979 for the spring season and, subsequently, through regular board action for that fall season. These changes were implemented over concerns that bear populations were in decline on Admiralty Island and in the more accessible areas of Baranof and Chichagof Islands (inside drainages). The outside drainages area of Unit 4 has an additional 11 days of spring hunting opportunity compared to the rest of Unit 4. This area is generally more difficult to access and sees less hunting pressure. During the last 10 regulatory years (RY15 – RY24) the inside drainage has accounted for 80% of the spring harvest despite the season being 11 days shorter.

In 2000, the BOG adopted the Unit 4 BBMS. The BBMS is a comprehensive plan that addresses both consumptive and non-consumptive uses of brown bears. The guidelines in the plan along with current seasons and bag limits have been successful in providing a sustainable brown bear harvest while also providing high quality bear viewing opportunities. Changing the hunt boundaries in Unit 4 could result in increased conflicts in the field between user groups. A multi-user group plan was developed by stakeholders to reduce conflicts based on known dates and areas; a change in hunting season introduces a change to that agreement. Because the BBMS involved various stakeholder groups to come to management consensus, it may be inappropriate to make major changes in the hunt structure without reconvening the Brown Bear Management Team. The BBMS was most recently reaffirmed by BOG in 2013.

A similar proposal was submitted for consideration and failed at the January 2023 BOG meeting because the board did not want to make changes to the long-standing BBMS, which provides the desired balance between hunting and viewing.

Table 1. The Brown Bear Management Strategy guidelines for human-caused mortality along with the 10 average human-caused mortality, regulatory year 2015 – 2024 in Unit 4, Alaska.

	BBMS Guideline Mortality		Human-caused Mortality, 2015-2024 (10-Year Average)	
ISLAND	Total Bears	Female	Total Bears	Female
Admiralty	62	23	44	6
Baranof	42	16	37	11
NE Chichagof	18	7	13	3
Chichagof (Remainder)	50	19	36	5
Total	172	65	130	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. While it is likely that there will be increased harvest from this area if the proposal passes, human-caused mortality as well as harvest of females has been below GHLs for both NE Chichagof Island and

all of Unit 4 over the last decade. Current hunt areas, seasons, and guideline mortality levels provide for sustainable harvest. Although unlikely, changing the boundary line and thus the season dates could result in unsustainable mortality and declining populations of brown bears in the proposal area. The proposal could also result in user group conflicts which are allocative in nature. As noted a multi-use group agreement was reached by stakeholders to reduce conflicts between consumptive and nonconsumptive resource uses. The department cautions about making changes to long-standing brown bear regulations without input from the Brown Bear Management Team.

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

PROPOSAL 22 – 5 AAC: 85.020. Hunting seasons and bag limits for brown bear. Extend RB/DB077 brown bear hunting season by moving the start date to September 1 as follows:

<u>Residents and nonresidents</u>	<u>Hunt</u>	<u>Dates</u>
One bear every four regulatory years	RB/DB077	Sept. 1 [Sept. 15]– Dec. 31

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would extend the RB/DB077 brown bear hunting season by adding two weeks to the start of the season. The start date would be September 1 instead of the current September 15 start date.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4

<u>Residents and nonresidents</u>	<u>Hunts</u>	<u>Dates</u>
One bear every four regulatory years	RB/DB077	Sept. 15 – Dec. 31

The Alaska Board of Game (board) has made a positive customary and traditional use finding for brown bears in Unit 4 and determined an amount reasonably necessary for subsistence of 5 – 10 bears annually.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the length of the RB/DB077 fall brown bear season by 14 days for both residents and nonresidents. Unlike the spring season which has two separate hunt areas, the fall season encompasses all of Unit 4. Historically, the fall season accounts for approximately 30% of the annual Unit 4 brown bear harvest. Over the past decade (RY15 – RY24) this equates to

approximately 30 bears annually. The percentage of females in the harvest is higher in the fall than in the spring. Guided nonresidents harvest 20% females and resident harvest is evenly split at about 50% male to 50% female. Still, this equates to only about 10 females harvested in the fall each year. There are several factors that lead to higher percentages of females in the fall harvest. Cubs are more likely to be closely associated with sows in the spring. Spring hunting usually occurs on beaches and estuaries where hunters have more time to observe and evaluate bears. The fall hunt is generally along salmon streams in the timber where it is darker and hunters have less time to judge bears. Fall brown bear hunting is strongly tied to salmon runs.

Moving the season start date to September 1st would give hunters the opportunity to hunt salmon streams when fish numbers are higher. This would likely lead to increased harvest. While it is difficult to predict actual increased harvest, the department anticipates the increase to be minimal. Nonresident hunts are limited by guide use authorizations so shifting the season dates will likely just result in a shift in harvest dates, though success rates might increase due to additional opportunity, better weather conditions, and bears being easier to encounter on salmon streams. Interest in brown bear hunting by residents in the fall is low as most hunters are more focused on deer and mountain goat hunting during that time of year. Although harvest is likely to increase, the department does not anticipate a biological or conservation concern since the overall Unit 4 bear harvest has been about 40 bears below guideline harvest levels for the last decade. Even though both nonresidents and residents harvest a higher percentage of females in the fall than spring, overall female harvest is still below the management objective of 3 males:2 females.

BACKGROUND: The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. This is a comprehensive management plan developed in 2000 to address the needs of multiple interest groups both consumptive and non-consumptive. Under this plan, the Guideline Harvest Level (GHL) for human-caused mortality is 4% of the most recent population estimate (2002). The guidelines in the plan along with current seasons and bag limits have been successful in providing a sustainable brown bear harvest while also providing high quality bear viewing opportunities. Changing the hunt dates in Unit 4 could result in increased conflicts in the field between user groups. A multi-user group plan was developed by stakeholders to reduce conflicts based on known dates and areas; a change in hunting season introduces a change to that agreement. Because the BBMS involved various user groups to come to management consensus, it may be inappropriate to make major changes in the hunt structure without reconvening the Brown Bear Management Team. The BBMS was most recently reaffirmed by BOG in 2013.

The current hunt dates have been in place for 45 years. The BOG first implemented these regulations by emergency order in April 1979 for the spring season and subsequently through regular board action for that fall season. These changes were implemented because of concerns that bear populations were in decline on Admiralty Island and the more accessible areas of

Baranof and Chichagof islands (inside drainages). Currently bear populations appear healthy and harvest has been well under GHLs (Table 1). Through the BBMS, the number of registered guides in Unit 4 is capped at 20 with a maximum number of guided hunts set at 148 which has mitigated most conservation concerns.

Table 1. The Brown Bear Management Strategy guidelines for human-caused mortality along with the 10 average human-caused mortality, regulatory year 2015 – 2024 in Unit 4, Alaska.

	BBMS Guideline Mortality		Human-caused Mortality, 2015-2024 (10-Year Average)	
ISLAND	Total Bears	Female	Total Bears	Female
Admiralty	62	23	44	6
Baranof	42	16	37	11
NE Chichagof	18	7	13	3
Chichagof (Remainder)	50	19	36	5
Total	172	65	130	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. While it is likely that there will be increased harvest if the proposal passes, human-caused mortality as well as harvest of females has been well below GHLs for all of Unit 4 over the last decade. Current hunt areas, seasons, and guideline mortality levels provide for sustainable harvest. The proposal could result in user group conflicts which are allocative in nature. As noted, a multi-use group agreement was reached by stakeholders to reduce conflicts between consumptive and nonconsumptive resource uses. The department cautions about making changes to long-standing brown bear regulations without input from the Brown Bear Management Team.

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

PROPOSAL 26 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Restrict hunters who take nanny goat in Unit 1C from hunting goat in Unit 1C for the following four regulatory years.

PROPOSED BY: Bruce and Ann-Marie Parker, Hans Baertle, and Lucas Mullen

WHAT WOULD THE PROPOSAL DO?

If a nanny is taken in Unit 1C, the hunter is prohibited from hunting goats in Unit 1C the following 4 regulatory years (RY), and nonresident hunters would be required to forfeit nannies to the department.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 1(C), that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River	Oct. 1 - Nov. 30	Oct. 1 - Nov. 30
1 goat by registration permit only; the taking of nannies with kids is prohibited		
Unit 1(C), that portion including all drainages of the Chilkat Range south of the south bank of the Endicott River		
RESIDENT HUNTERS: 1 goat by registration permit only; the taking of nannies with kids is prohibited	Aug. 1 - Nov. 30	
NONRESIDENT HUNTERS: 1 goat by registration permit only; the taking of nannies with kids is prohibited		Sept. 1 - Nov. 30
Unit 1(C), that portion bounded by the Montana Creek trail, McGinnis Creek to its headwaters, then due north to the edge of the south side of the Mendenhall Glacier, then north and west along the edge of the Mendenhall and Herbert Glaciers, then along; the southwest side of the Herbert Glacier and River back to the Montana Creek Trail	Oct. 1 - Nov. 30	Oct. 1 - Nov. 30
1 goat, by drawing permit only; up to 10 permits may be issued; the taking of nannies with kids is prohibited		

Unit 1(C), that portion draining into Stephens Passage between Eagle Glacier and River and the mouth of Little Sheep Creek, but excluding that portion bounded by the Montana Creek trail, McGinnis Creek to its headwaters, then due north to the edge of the south side of the Mendenhall Glacier, then north and west along the edge of the Mendenhall and Herbert Glaciers, then along the south- west side of the Herbert Glacier and River back to the Montana Creek Trail, and also excluding that portion above 2,000 feet and south of the west ridge of West Peak	No open season.	No open season.
Unit 1(C), that mainland portion draining into the south bank of Little Sheep Creek, above 2,000 feet and south of the west ridge of West Peak, with the contour and ridge being the boundary, Gastineau Channel south of Little Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Little Sheep Creek and Taku Glacier, including that portion on the south side of Blackerby Ridge encompassed by a line from Observation Peak west along the ridgeline down to the 1,000-foot contour, east along that contour to the north shore of Salmon Creek Reservoir, north of the main drainage into the head of reservoir following that drainage south and east up to the ridgeline and east to Olds Mountain	Aug. 1 - Nov. 30 (General hunt only)	Aug. 1 - Nov. 30
1 goat by registration permit only, and by bow and arrow only; the taking of nannies with kids is prohibited		

Remainder of Unit 1(C)	Aug. 1 - Nov. 30	Aug. 1 - Nov. 30
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1 goat by registration permit only;
the taking of nannies with kids is
prohibited

There is a positive customary and traditional use (C&T) finding for mountain goat in GMU 1C, with an amount reasonably necessary for subsistence (ANS) of 25 – 30 mountain goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

If adopted, the proposal would encourage hunters to target only male mountain goats. Retaining adult females in the population could make goat populations more resilient, help populations rebound after declines, and provide greater hunting opportunity in future years.

BACKGROUND: The department uses small geographic areas within game management units (Units) to manage mountain goat harvest in Southeast Alaska. Guideline harvest levels (GHL) are established for each area and are based on the allocation of points determined through aerial surveys (male goat = 1 point, female goat = 2 points) within each area. GHLs are established by allowing the harvest of 6 points per 100 adult goats (6% of the count) observed during aerial surveys in each hunt area. Once the harvest has reached the GHL, the hunt is closed by emergency order. For example, an area with a GHL of 1-2 points allows for the harvest of 1 male goat or 1 female goat before the area is closed by emergency order. The harvest of males is encouraged to increase future harvest opportunity and ensure the long-term sustainability of the localized populations.

This proposal was submitted to address concerns about reduced hunting opportunities in hunt areas where nanny harvest occurs. The Board of Game (board) adopted similar proposals for Units 6, 7, and 15, which state that if a nanny is taken in any of those units the hunter is prohibited from hunting any goats in the unit for 5 years. The board adopted a similar proposal for Unit 1D, which restricts hunters who harvest a nanny from harvesting a goat for 1 year.

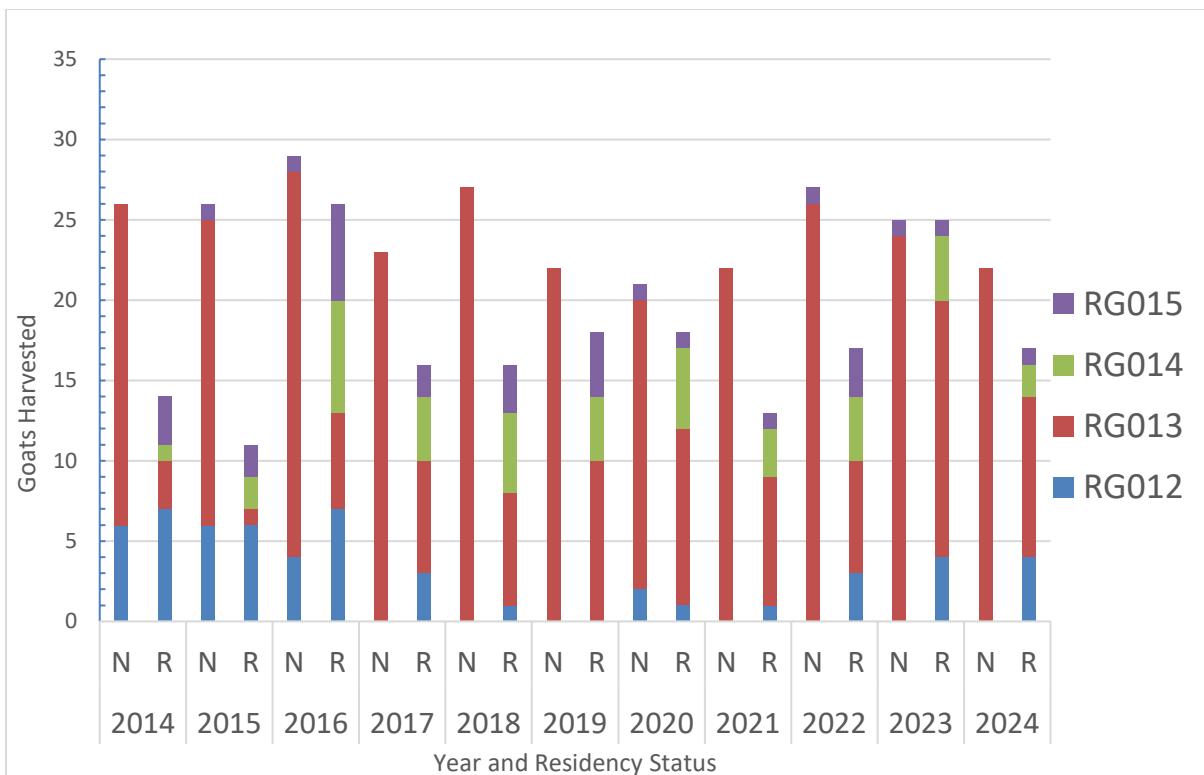


Figure 1. This graph shows the 4 goat hunts in Unit 1C (RG012-15) with total harvest of goats by resident versus non-resident for RY2014-24.

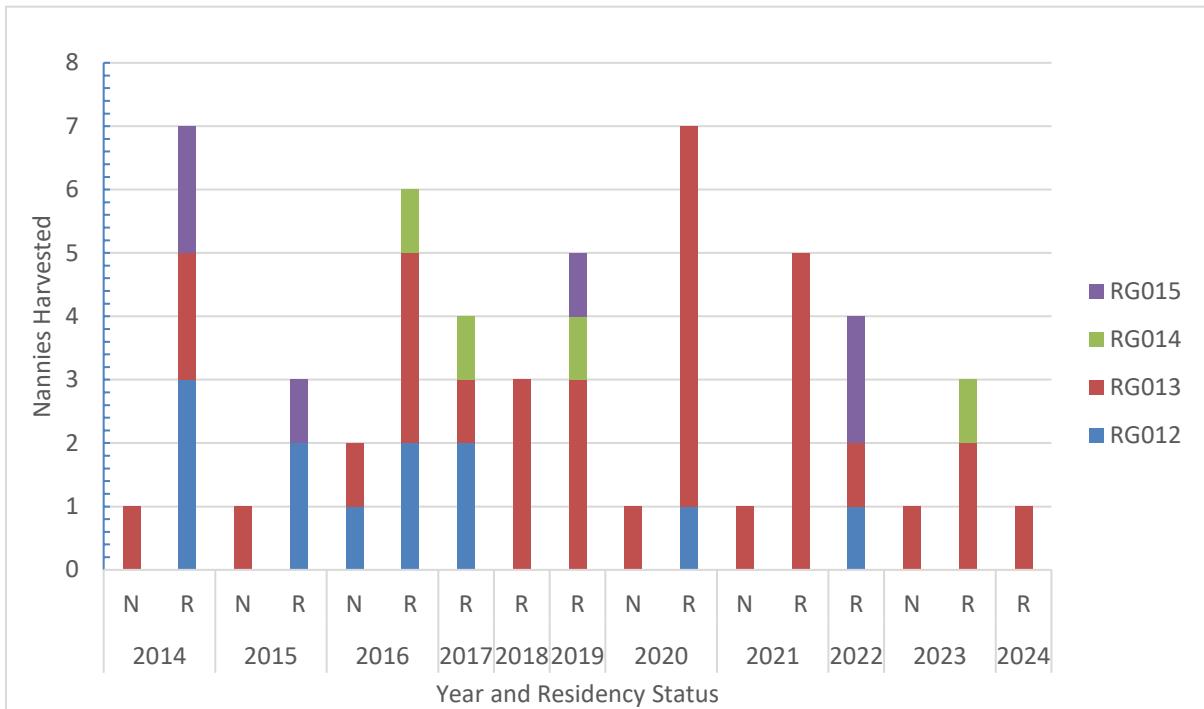


Figure 2. This graph shows the 4 goat hunt zones in Unit 1C (RG012-15) with total harvest of female goats by resident versus non-resident for RY2014-24.

Between RY2014-24, nonresidents harvested more mountain goats than residents, with the exception of FY23 when both user groups harvested an equal number of goats. Nonresidents harvested 8 nannies while residents harvested 47 nannies in total between RY14-24. Nannies taken by nonresidents, between RY14-24 did not exceed 2 nannies in a single regulatory year. Most nannies are taken in hunt zone RG013, which is also a guide use area used by several mountain goat guides. The guides are concerned because most of the nanny harvest is from resident hunters, which leads to less hunting opportunity for all hunters.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department will continue to manage mountain goat populations sustainably while providing hunting opportunity. The department can close hunt units or alter guideline harvest levels based on mountain goat populations estimated during surveys and in season harvest of the proportion of nannies. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 31 – 5 AAC 85.020(a)(1). Hunting seasons and bag limits for brown bear.

Change the bag limit on the Chilkat Range in Unit 1C from one bear every 4 years to one bear every year.

PROPOSED BY: Jesse Ross

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit from 1 brown bear every 4 regulatory years for the Chilkat Range on the western side of the Lynn Canal in Unit 1C to 1 bear every regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Remainder of Unit 1	Sept. 15 – Dec. 31 (General hunt only)	Sept. 15 – Dec. 31 Mar. 15 – May 31
	Mar. 15 – May 31 (General hunt only)	

1 bear every 4 regulatory years
By registration permit only

Unit 1C has a positive customary and traditional use (C&T) finding for brown bear outside the Juneau Nonsubsistence Area and an amount reasonably necessary for subsistence (ANS) of 1 bear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The longstanding bag limit of one bear every 4 years in Unit 1C would be repealed and both resident and nonresident hunters would be able to harvest up to 1 brown bear every regulatory year (RY) throughout the Chilkat Range.

BACKGROUND: The proposal would allow for the harvest of 1 brown bear every year within the Chilkat Range (Figure 1) and remove the 4-year waiting period currently in place between harvests. The current harvest regulations allow for sustainable brown bear harvest in Southeast Alaska. Brown bears have a slow reproductive cycle; they begin breeding at 5 years old and have young every 3–4 years. Mainland bear populations inhabit landscapes with deep fjords and extensive icefields and are subsequently isolated in an island-like fashion. There are minimal incidences of emigration and immigration in brown bear populations within the Chilkat Range.

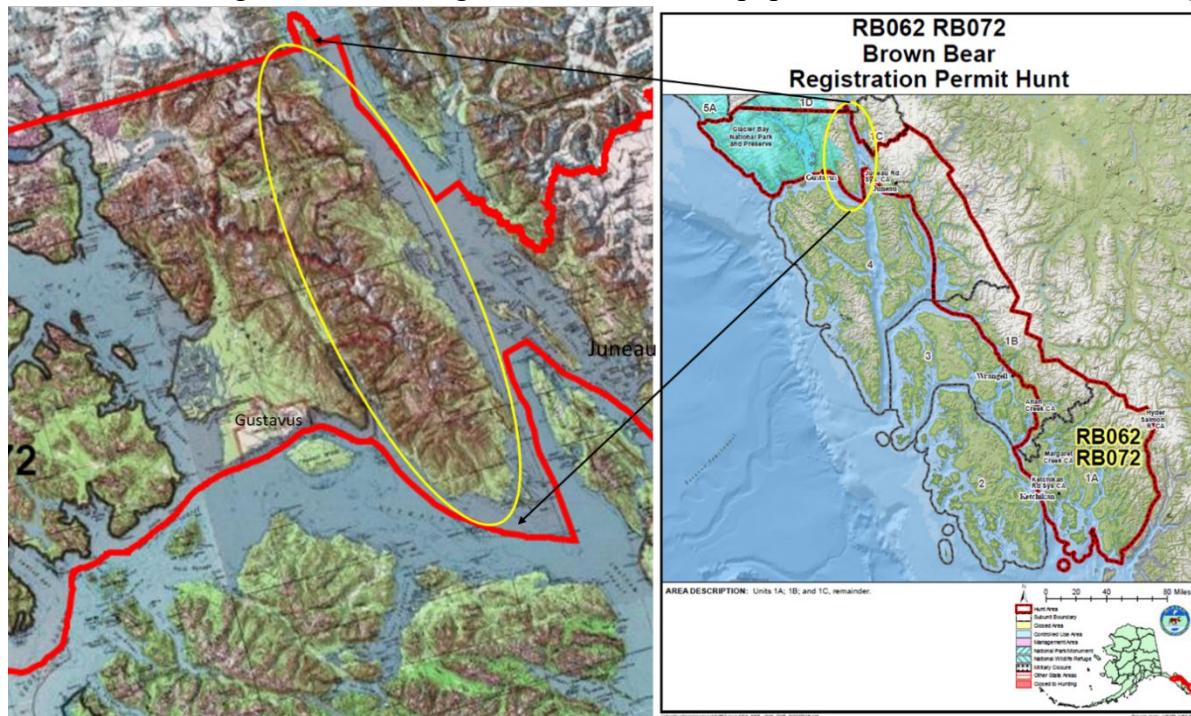


Figure 1. A map of the Chilkat Range (left) and an overall map of RB062 and RB072 (right) showing where the Chilkat Range is located in Game Management Unit 1.

The proponent suggests the department has documented an increase in the brown bear population in this area. The department has not conducted any recent surveys of bears in this portion of the Chilkat Range and monitors population levels through harvest statistics (Table 1). Over the past 10 years, RY15–24, harvest and hunter participation increased for brown bears in the Chilkat Range. From RY2015 to 2019, hunter participation per year was 13.6 hunters and harvest per year was 3.4 bears. During the most recent 5-year period (RY20–24) hunter participation per year increased to 18.2 hunters and harvest was 4.6 bears. The increased hunter participation and harvest from the most recent 5-year period do not indicate a growing brown bear population. Anecdotal reports from hunters over the last few years suggest an increase in the brown bear population on the Chilkat Range but, in 2025, some hunters reported seeing fewer brown bears.

Based on brown bear densities estimated in other Southeast Alaska mainland brown bear populations, the department estimates the Chilkat Range population size is between 68 and 146 bears. Given a sustainable guideline harvest level (GHL) of 4% used across most of Southeast Alaska, the department determined the allowable harvest is between 2–5 brown bears per year (Table 2). This is a conservative harvest estimate established in the Unit 4 Brown Bear Management Plan. Brown bear harvest along the Chilkat Range has been equal to or greater than this GHL for 8 of the past 10 years. Brown bear populations fluctuate and the department's current monitoring and harvest management is not designed to initiate in-season management.

Table 1. Total hunters, non-resident hunters and harvest for the Chilkat Range, Unit 1C, Alaska, regulatory year 2015–2024.

Regulatory Year	Total Hunters	Resident Hunters	Non-resident Hunters	Spring Harvest	Fall Harvest	Total Harvest
2015	9	9	0	1	0	1
2016	19	19	0	2	1	3
2017	10	8	2	1	1	2
2018	16	14	2	4	2	6
2019	14	14	0*	4	1	5
2020	25	24	1	5	2	7
2021	16	14	2	4	0	4
2022	6	6	0	0	0	0
2023	19	17	2	4	1	5
2024	25	22	3	7	0	7

*Non-resident bear season in the spring was closed due to the Covid-19 pandemic.

Table 2. Brown bear management guidelines to consider for harvestable surplus on the Chilkat Range in GMU 1C.

	Population size	Bear habitat area (km ²)	Bear habitat area (mi ²)	Density/ 1,000km ²	Density/ mi ²	Estimated Sustainable Mortality Level (4.0% annual level)	Allowable Reported Harvest	Mortality rate
Chilkat Range - GMU 1C -GMU 1D density	146	1350	521.24	108.20	0.280	5.8	5.0	4.0%
Chilkat Range - GMU 1C - Yakutat density	133	1350	521.24	98.83	0.256	5	4.4	3.7%
Chilkat Range - GMU 1C - Berner's Bay density	122	1350	521.24	90.21	0.234	5	4.0	4.1%
Chilkat Range - GMU 1C - Coastal Alaska density	68	1350	521.24	50.00	0.129	3	2.2	4.4%

The proponent suggests that the Chilkat Range brown bear harvest should be managed the same as Berners Bay brown bear harvest, however these are different populations that are managed differently because of access. Hunter access is much greater along the Chilkat Range than access to the Berner's Bay area, specifically the interior areas of Berners Bay which require specialized equipment (e.g., airboats) to access.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Hunter participation and harvest are increasing in this area. There are 3 proposals during this cycle asking to change brown bear bag limits in Unit 1C and Unit 5 to 1 bear every year. Brown bear populations naturally fluctuate, and the department's current monitoring and harvest management is not designed to initiate in-season management. Since the early 2000s, the department has tried to manage the harvest of brown bears in Southeast Alaska at or just above 4% of the population to ensure sustainable harvest. Areas with greater harvests, such as Unit 1D, have indications of overharvest prior to 2020, when 49 bears were harvested in a single year and before the department implemented conservation actions. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 32 – 5 AAC 85.020(a)(1). Hunting seasons and bag limits for brown bear.

Change the bag limit on the Chilkat Range in Unit 1C from one bear every 4 years to one bear every year.

PROPOSED BY: Jon Geary

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit from 1 brown bear every 4 regulatory years for the Chilkat Range on the western side of the Lynn Canal, in Unit 1C to 1 bear every regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Remainder of Unit 1	Sept. 15 – Dec. 31 (General hunt only)	Sept. 15 – Dec. 31
	Mar. 15 – May 31 (General hunt only)	Mar. 15 – May 31
1 bear every 4 regulatory years		
By registration permit only		

Unit 1C has a positive customary and traditional use (C&T) finding for brown bear outside the Juneau Nonsubsistence Area and an amount reasonably necessary for subsistence (ANS) of 1 bear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The longstanding bag limit of one bear every 4 years in Unit 1C would be repealed and both resident and nonresident hunters would be able to harvest up to 1 brown bear every regulatory year (RY) throughout the Chilkat Range.

BACKGROUND: The proposal would allow for the harvest of 1 brown bear every year within the Chilkat Range (Figure 1) and remove the 4-year waiting period currently in place between harvests. The current harvest regulations allow for sustainable brown bear harvest in Southeast Alaska. Brown bears have a slow reproductive cycle; they begin breeding at 5 years old, and have young every 3–4 years. Mainland bear populations inhabit landscapes with deep fjords and extensive icefields and are subsequently isolated in an island-like fashion. There are minimal incidences of emigration and immigration in brown bear populations within the Chilkat Range.

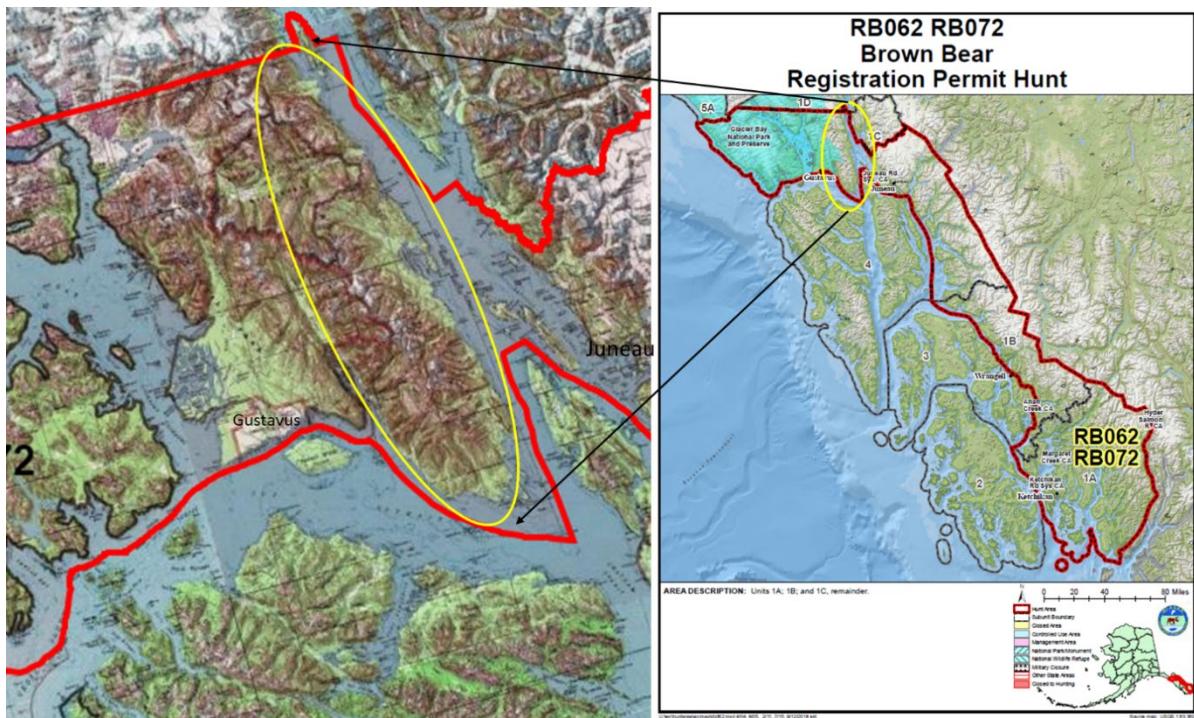


Figure 1. A map of the Chilkat Range (left) and an overall map of RB062 and RB072 (right) showing where the Chilkat Range is located in Game Management Unit 1.

The proponent suggests the department has documented an increase in the brown bear population in this area. The department has not conducted any recent surveys of bears in this portion of the Chilkat Range and monitors population levels through harvest statistics (Table 1). Over the past 10 years, RY15–24, harvest and hunter participation increased for brown bears in the Chilkat Range. From RY2015 to 2019, hunter participation per year was 13.6 hunters and harvest per year was 3.4 bears. During the most recent 5-year period (RY20–24) hunter participation per year increased to 18.2 hunters and harvest was 4.6 bears. The increased hunter participation and harvest from the most recent 5-year period do not indicate a growing brown bear population. Anecdotal reports from hunters over the last few years suggest an increase in the brown bear population on the Chilkat Range but, in 2025, some hunters reported seeing fewer brown bears.

Based on brown bear densities estimated in other Southeast Alaska mainland brown bear populations, the department estimates the Chilkat Range population size is between 68 and 146 bears. Given a sustainable guideline harvest level (GHL) of 4% used across most of Southeast Alaska, the department determined the allowable harvest is between 2–5 brown bears per year (Table 2). This is a conservative harvest estimate established in the Unit 4 Brown Bear Management Plan. Brown bear harvest along the Chilkat Range has been equal to or greater than this GHL for 8 of the past 10 years. Brown bear populations fluctuate and the department's current monitoring and harvest management is not designed to initiate in-season management.

Table 1. Total hunters, non-resident hunters and harvest for the Chilkat Range, GMU 1C, Alaska, regulatory year 2015–2024.

Regulatory Year	Total Hunters	Resident Hunters	Non-resident Hunters	Spring Harvest	Fall Harvest	Total Harvest
2015	9	9	0	1	0	1
2016	19	19	0	2	1	3
2017	10	8	2	1	1	2
2018	16	14	2	4	2	6
2019	14	14	0*	4	1	5
2020	25	24	1	5	2	7
2021	16	14	2	4	0	4
2022	6	6	0	0	0	0
2023	19	17	2	4	1	5
2024	25	22	3	7	0	7

*Non-resident bear season in the spring was closed due to the Covid-19 pandemic.

Table 2. Brown bear management guidelines to consider for harvestable surplus on the Chilkat Range in GMU 1C.

	Population size	Bear habitat area (km ²)	Bear habitat area (mi ²)	Density/ 1,000km ²	Density/ mi ²	Estimated Sustainable Mortality Level (4.0% annual level)	Allowable Reported Harvest	Mortality rate
Chilkat Range - GMU 1C - GMU 1D density	146	1350	521.24	108.20	0.280	5.8	5.0	4.0%
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Chilkat Range - GMU 1C - Berner's Bay density	122	1350	521.24	90.21	0.234	5	4.0	4.1%
Chilkat Range - GMU 1C - Coastal Alaska density	68	1350	521.24	50.00	0.129	3	2.2	4.4%

The proponent suggests that the Chilkat Range brown bear harvest should be managed the same as Berners Bay brown bear harvest, however these are different populations that are managed differently because of access. Hunter access is much greater along the Chilkat Range than access

to the Berner's Bay area, specifically the interior areas of Berners Bay which require specialized equipment (e.g., airboats) to access.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Hunter participation and harvest are increasing in this area. There are 3 proposals during this cycle asking to change brown bear bag limits in Unit 1C and Unit 5 to 1 bear every year. Brown bear populations naturally fluctuate, and the department's current monitoring and harvest management is not designed to initiate in-season management. Since the early 2000s, the department has tried to manage the harvest of brown bears in Southeast Alaska at or just above 4% of the population to ensure sustainable harvest. Areas with greater harvests, such as Unit 1D, have indications of overharvest prior to 2020, when 49 bears were harvested in a single year and before the department implemented conservation actions. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 33 – 5 AAC 85.020(a)(4). Hunting seasons and bag limits for brown bear.

Change the bag limit in Unit 5 from 1 bear every 4 regulatory years to 1 bear every regulatory year.

PROPOSED BY: Trevor Embry

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit from 1 bear every 4 regulatory years (RY) to 1 bear every regulatory year for residents and nonresidents in Unit 5.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 5	Sept. 1 – May 31	Sept. 1 – May 31
1 bear every 4 regulatory years		
By registration permit only		

Unit 5 has a positive customary and traditional use finding for brown bears and an amount reasonably necessary for subsistence of 3 – 6 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Resident and nonresident hunters would be able to harvest up to 1 brown bear every regulatory year throughout GMU 5.

BACKGROUND: The proponent would like the regulations to allow for the harvest of 1 brown bear every year within GMU 5 instead of having to wait 4 years to be able to harvest another bear. The current harvest regulations are implemented to allow for sustainable brown bear harvest in Southeast Alaska. Brown bears have a slow reproductive cycle; they begin breeding at 5 years old and have young every 3–4 years. Furthermore, even on the mainland, bear populations are isolated in an island-like fashion due to deep fjords and extensive icefields with minimal emigration and immigration in the population.

The department does not have information that suggests bear populations have increased in Unit 5. A 2013 department population study estimated a population of 354 ± 29 bears in Unit 5A. At the 4% harvest rate commonly used to guide harvestable surplus in Southeast, the guideline harvest rate would be about 14 bears per year in Unit 5A. Comparatively, Unit 5B typically has even lower harvest rates because of the difficulty accessing the area, and the department does not expect harvest to increase even if more opportunity is provided. Brown bear harvest has been low over the last 10 years in units 5A and 5B (Figure 1), but this has been attributed to the local transporter not taking bear hunters out on hunts, unlike prior to 2014 when transportation was more readily available to hunters than in last decade. In 2025, a new air taxi opened which will likely increase access. In the 10-year period between 2005 and 2014, the average harvest in all of Unit 5 was 24 bears per regulatory year.

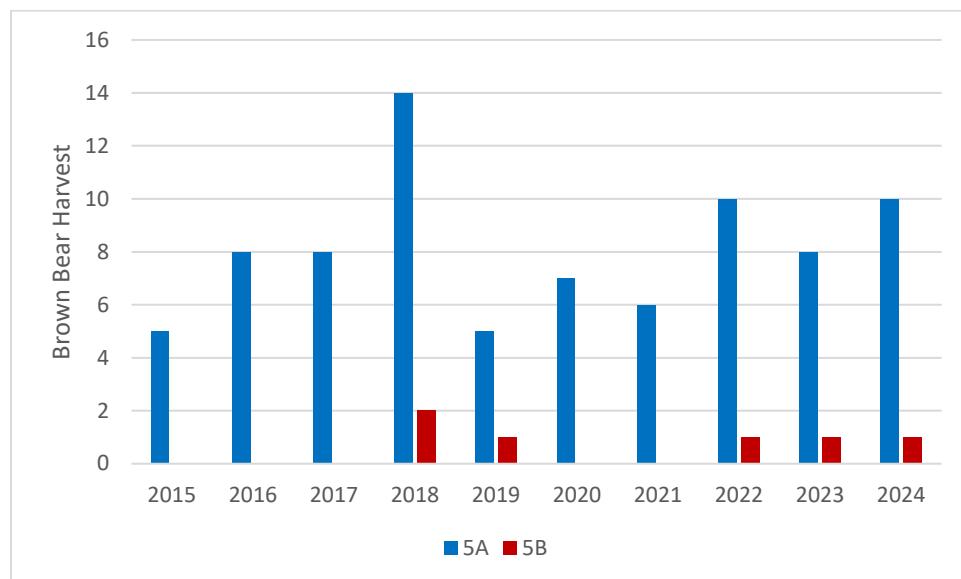


Figure 1. Total brown bear harvest by residents and nonresidents in Game Management Unit 5A (blue) and 5B (red), Alaska, regulatory year 2015–2024.

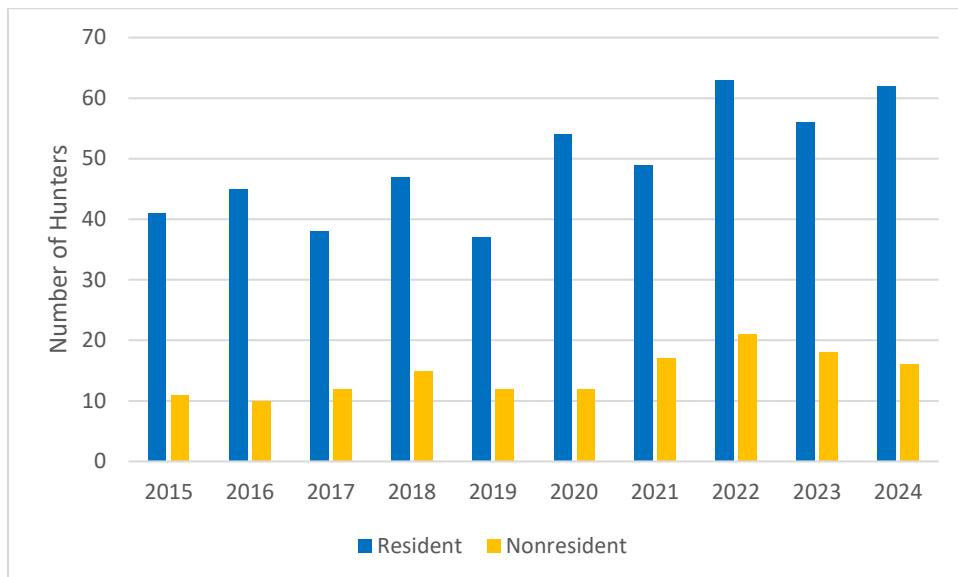


Figure 2. Number of brown bear hunters in Game Management Unit 5 including resident hunters (blue) and nonresident hunters (yellow), Alaska, regulatory year 2015–2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Hunter participation and harvest are increasing in this area. There are 3 proposals during this cycle asking to change brown bear bag limits in Unit 1C and Unit 5 to 1 bear every year. Brown bear populations naturally fluctuate, and the department's current monitoring and harvest management is not designed to initiate in-season management. Since the early 2000s, the department has tried to manage the harvest of brown bears in Southeast Alaska at or just above 4% of the population to ensure sustainable harvest. Areas with greater harvests, such as Unit 1D, have indications of overharvest prior to 2020, when 49 bears were harvested in a single year and before the department implemented conservation actions. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

PROPOSAL 44 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Limit nonresidents to up to 20% of the total permits available for DG005, when 5 permits or more are issued.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would limit the nonresident allocation of DG005 to up to 20% of the available permits. No more than 20% of DG005 draw permits would be allocated to nonresidents. If less than 5 total permits are available, no permits would be awarded to nonresidents.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1)	Aug. 1 – Dec. 31 (General Hunt only)	Aug. 1 – Dec. 31
.....		
Unit 1(A), remainder of Revillagigedo Island		
1 goat by drawing permit only; up to 50 permits will be issued; the taking of nannies with kids is prohibited		
.....		

Nonresidents must use an Alaska registered guide to hunt mountain goats in Alaska, or must be accompanied by a resident relative within the second degree of kindred.

There is a positive customary and traditional use finding for goats in Unit 1A outside of the Ketchikan Nonsubsistence Area (NSA). The hunt area for DG005 is located wholly within the Ketchikan NSA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A maximum of up to 20% of the permits allocated for DG005 would be available for nonresidents. If less than 5 permits are available, no permits will be issued to nonresidents. This proposal limits nonresident hunting opportunity.

BACKGROUND: The goats on Revillagigedo Island in Unit 1A originated from 2 separate introduction efforts by the department in 1983 and 1991 in an effort to provide easy-access goat hunting. The goat population quickly spread throughout Revillagigedo Island and eventually the department was able to provide goat hunting opportunities. Because there is relatively easy access to goats near Ketchikan, the Board of Game decided to create draw hunts to support a stable population of goats while reducing the possibility of overcrowded hunting conditions. The department uses its discretionary authority to split the drawing permit hunt in Unit 1A remainder of Revillagigedo Island into 2 separate drawing permit hunts (DG005 and DG006). The efforts were successful and the goat hunts near Ketchikan (DG005 and DG006) provide a highly sought after draw tag with the opportunity to harvest a trophy goat. This hunt allows residents to choose the best weather to hunt during the long goat hunting season.

Drawing permit goat hunt DG005 is a small hunt area accessible by the Ketchikan road-system (Fig. 1). The average number of permits issued for this hunt area from 2015 – 2024 was 4 (Table 1). The number of permits issued is based on sightability-corrected aerial minimum counts of goats with a maximum allowable harvest of 7% of the surveyed population. Since 2015, the number of permits issued in this hunt area has ranged from 3-5 and the department does not expect this to change as the goat population in the immediate area has changed little since goats expanded their range to all of Unit 1A. Residents are awarded the majority of permits in this hunt; in the past 10 regulatory years 5% of permits were awarded to nonresidents (2 nonresidents total) (Table 1).

DG005 Mountain Goat Drawing Permit Hunt

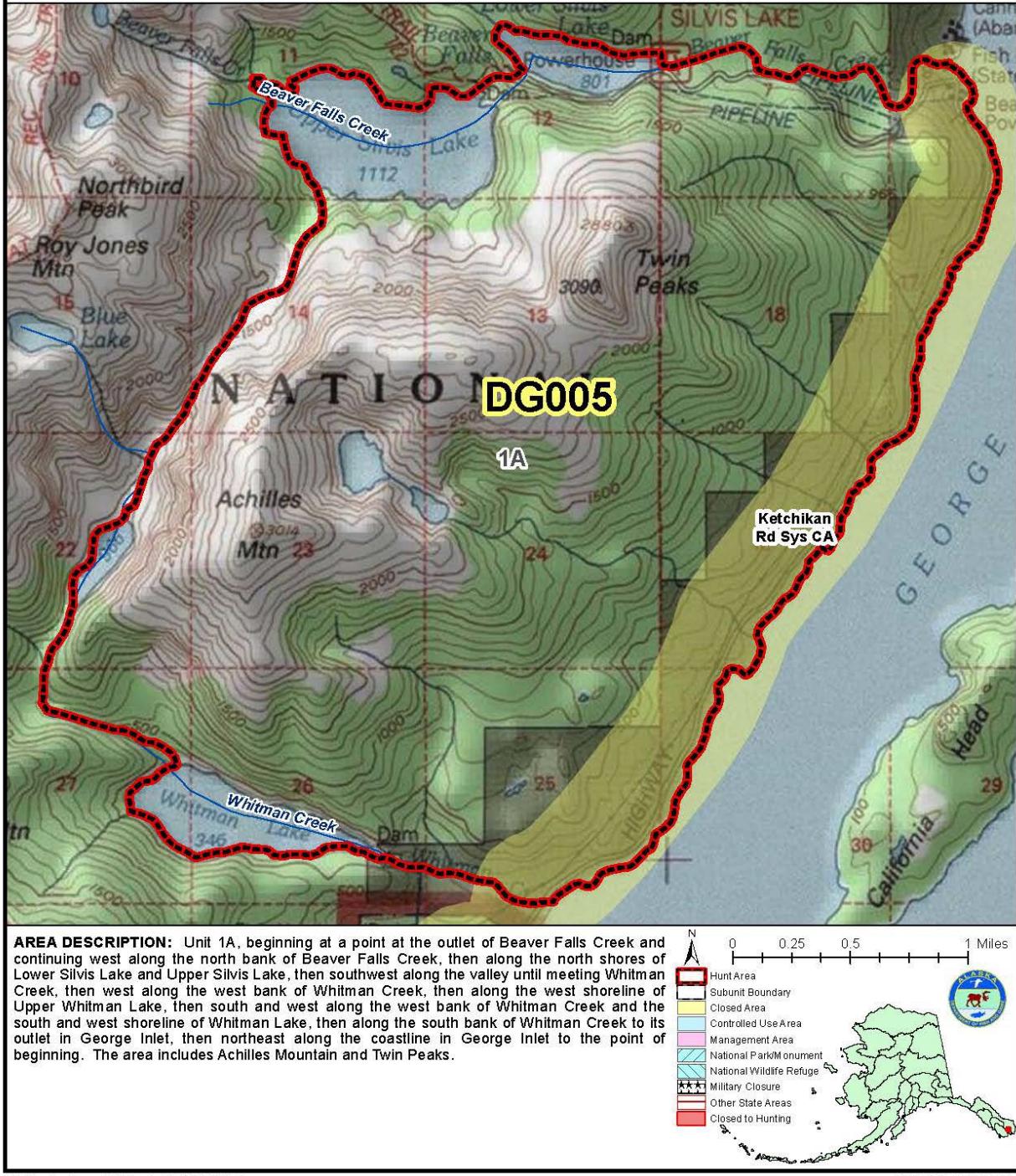


Table 1. Resident and nonresident permit application and allocation, DG005. NR = nonresident, NR-2DK = nonresidents applying under second degree kindred.

Reg. Year	Hunt	Total # Apps.	# NR Apps.	% NR Apps.	NR-2DK Apps.	% NR-2DK Apps.	# NR Winners	% NR Winners	# NR-2DK Winner	% NR-2DK Winner	# Permits Awarded
2017	DG005	698	145	21	33	5	0	0	0	0	4
2018	DG005	745	77	10	19	3	0	0	0	0	4
2019	DG005	709	35	5	24	3	0	0	0	0	5
2020	DG005	664	22	3	11	2	0	0	0	0	5
2021	DG005	735	40	5	17	2	0	0	0	0	5
2022	DG005	793	75	9	45	6	1	33	0	0	3
2023	DG005	746	90	12	35	5	0	0	0	0	3
2024	DG005	751	40	5	28	4	0	0	0	0	3
2025	DG005	756	63	8	49	6	1	33	1	33	3

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative between residents and nonresident hunters. Due to the small size of the unit, the number of permits is not likely to change significantly. Residents submit more applications than nonresidents, and as a result nonresidents have only been awarded 5% of the permits issued from regulatory year 2015 – 2024. This would also likely result in fewer clients for registered hunting guides as nonresidents are required to hunt with either a registered Alaska hunting guide or a resident relative within the second degree of kindred.

If the board adopts this proposal, the hunts will be assigned individual hunt numbers for residents and nonresidents, which will result in nonresidents receiving 20% of the total permits available, if more than 5 permits are advertised. Allocation of other goat permits hunts are found in 5 AAC 92.057 and are done by unit, not individual hunt area. The board will also deliberate Proposal 45, which addresses the other hunt on the remainder of Revillagigedo Island, at the January 2026 board meeting.

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

PROPOSAL 45 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Limit nonresidents to up to 20% of the total permits available for DG006, when 5 or more permits are issued.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would limit the nonresident allocation of DG006 to up to 20% of the available permits. No more than 20% of DG006 draw permits would be allocated to nonresidents. If less than five total permits are available, no permits would be awarded to nonresidents.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
	(1)	
.....		
Unit 1(A), remainder of Revillagigedo Island	Aug. 1 – Dec. 31 (General Hunt only)	Aug. 1 – Dec. 31
1 goat by drawing permit only; up to 50 permits will be issued; the taking of nannies with kids is prohibited		
.....		

Nonresidents must use an Alaska registered guide to hunt mountain goats in Alaska, or must be accompanied by a resident relative within the second degree of kindred.

There is a positive customary and traditional use finding for goats in Unit 1A outside of the Ketchikan Nonsubsistence Area (NSA). The hunt area for DG006 is located wholly within the Ketchikan NSA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A maximum of up to 20% of the permits allocated for DG006 would be available for nonresidents. If less than 5 permits are available, no permits will be issued to nonresidents. If this proposal is adopted, nonresident hunting opportunity will be reduced.

BACKGROUND: The goats on Revillagigedo Island in Unit 1A originated from 2 separate introduction efforts by the department in 1983 and 1991 in an effort to provide easy access goat hunting. The goat population quickly spread throughout Revillagigedo Island and eventually the department was able to provide goat hunting opportunities. Because there is relatively easy access to goats near Ketchikan, the Board of Game decided to create draw hunts to support a stable population of goats while reducing the possibility of overcrowded hunting conditions. The department uses its discretionary authority to split the drawing permit hunt in Unit 1A remainder of Revillagigedo Island into 2 separate drawing permit hunts (DG005 and DG006). The efforts were successful and the goat hunts near Ketchikan (DG005 and DG006) provide a highly sought after draw tag with the opportunity to harvest a trophy goat. This hunt allows residents to choose the best weather to hunt during the long goat hunting season.

The DG006 hunt is accessible from the Ketchikan road-system (Fig. 1). The average number of permits issued for this hunt area from regulatory year (RY) 2015 – 2024 was 21 permits (Table 1). The number of permits issued is based on sightability-corrected aerial minimum counts of goats with a maximum allowable harvest of 7% of the surveyed population. Since RY2015, 16 nonresidents have received permits for DG006 (Table 1). From RY2015 – RY2024 only 8% of permits were drawn by nonresidents. The most nonresident permits awarded in a single year was during regulatory year 2022 with 4 permits total, which was 15% of the total tags that year.

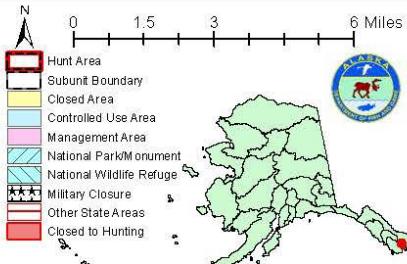
DG006

Mt Goat

Drawing Permit Hunt



AREA DESCRIPTION: Unit 1A, Revillagigedo Island South, that portion bounded on the north beginning at the north banks of Roosevelt Lagoon, Naha River and Heckman Lake to the inlet of Naha River into Heckman Lake; then southeast along the valley to Salt Lagoon at the head of George Inlet, then south along the west coastline of George Inlet to the outlet of Beaver Falls Creek; then west long the north bank of Beaver Falls Creek, then along the north shores of Lower Silvis Lake and Upper Silvis Lake, then southwest along the valley until meeting Whitman Creek, then west along the west bank of Whitman Creek, then along the west shoreline of Upper Whitman Lake, then south and west along the west bank of Whitman Creek and the south and west shoreline of Whitman Lake, then along the south bank of Whitman Creek to its outlet in George Inlet, then south to Mountain Point, and continuing along the southern shoreline of Revillagigedo Island through Tongass Narrows around Clover Passage to the point of beginning. The area includes Deer, Dude, Diana, Brown and Mahoney Mountains.



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Source map: USGS 1:63,360

Figure 1. Drawing permit hunt DG005 in Unit 1A, Southeast Alaska.

Table 1. Resident and nonresident permit application and allocation, DG006. NR = nonresident, NR-2DK = nonresidents applying under second degree kindred.

Reg. Year	Hunt	Total # Apps.	# NR Apps.	% NR Apps.	NR-2DK Apps.	% NR-2DK Apps.	# NR Winners	% NR Winners	# NR-2DK Winner	% NR-2DK Winner	# Permits Awarded
2017	DG006	1183	60	5	38	3	0	0	0	0	14
2018	DG006	1507	133	9	44	3	1	8	0	0	13
2019	DG006	1889	159	8	26	1	0	0	0	0	20
2020	DG006	2107	201	10	50	2	3	12	0	0	25
2021	DG006	2470	340	14	69	3	3	12	1	4	26
2022	DG006	2592	380	15	86	3	4	16	0	0	25
2023	DG006	2903	572	20	106	4	3	13	1	4	23
2024	DG006	3225	610	19	137	4	2	10	1	5	21
2025	DG006	3400	718	21	165	5	4	17	0	0	23

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. If nonresidents are limited to 20% of the total permits available, the department anticipates being able to issue a small number of permits to nonresidents each year. Residents submit more applications than nonresidents, and as a result nonresidents have been awarded between 0 and 17% of the permits issued from regulatory year 2017-2025.

If the board adopts this proposal, the hunts will be assigned individual hunt numbers for residents and nonresidents, which will result in nonresidents receiving 20% of the total permits available, if more than 5 permits are advertised. Allocation of other goat permits hunts are found in 5 AAC 92.057 and are done by unit, not individual hunt area. The board will also deliberate Proposal 44, which addresses the other hunt on the remainder of Revillagigedo Island, at the January 2026 board meeting.

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

PROPOSAL 46 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Limit nonresidents to up to 20% of the total permits available for DG008, when 5 permits or more are issued.

PROPOSED BY: Craig Van Arsdale

WHAT WOULD THE PROPOSAL DO? This proposal would limit the nonresident allocation of DG008 to up to 20% of the available permits. If less than 5 total permits are available, no permits would be awarded to nonresident hunters.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1)		
.....		
Units 1(A) and 1(B), that portion on the Cleveland Peninsula south of the divide between Yes Bay and Santa Anna Inlet	Aug. 1 – Dec. 31 (General Hunt only)	Aug. 1 – Dec. 31
1 billy by drawing permit only, up to 6 permits may be issued		

Nonresidents must use an Alaska registered guide to hunt mountain goats in Alaska, or must be accompanied by a resident relative within the second degree of kindred.

There is a positive customary and traditional use finding for goats in Unit 1A outside of the Ketchikan Nonsubsistence Area (NSA) and in Unit 1B. The board has determined that the amount reasonably necessary for subsistence is 5–10 goats in Unit 1A, outside the NSA, and 5–10 goats in Unit 1B. Portions of the DG008 hunt area are within the NSA boundaries.

There is a positive customary and traditional use finding for goats in Unit 1A outside of the Ketchikan Nonsubsistence Area (NSA) and in Unit 1B. The board has determined that the amount reasonably necessary for subsistence is 5–10 goats in Unit 1A, outside the NSA, and 5–10 goats in Unit 1B. Portions of the DG008 hunt area are within the NSA boundaries.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal will limit nonresident hunting opportunity in the DG008 hunt.

BACKGROUND: The Cleveland Peninsula (Fig. 1) is an approximately 31-mile-long peninsula from the divide between Yes Bay and Santa Anna Inlet to the southernmost tip. It is mainly forested, with lakes and muskeg complexes scattered throughout. Approximately 20 miles separate suitable goat habitat between the lower Cleveland Peninsula and mainland mountain complexes. This isolation causes minimal exchange of goats from the north to south. Genetic diversity decreases from north to south on the peninsula due to this isolation. Also, the horns of goats from this area are larger than goats from the surrounding area. DG008 is prized for its trophy goats.

The isolated peninsula has a small population of goats that are carefully managed to sustain harvest. Before 2002, there was a slow decline in the minimum count of goats which led to a closure of the hunt from 2002 to 2018. The Board of Game opened a limited draw hunt for this area in regulatory year (RY) 2019. Only 1–2 permits have been given out annually for this area since the hunt was created. The average number of permits offered for this hunt from RY2019 – 2024 was 2 (Table 1). The number of permits available is based on sightability-corrected aerial minimum counts of goats with a maximum allowable harvest of 4% of the surveyed population. The number of permits in this unit is not likely to change dramatically from year to year as the goat population is consistently low. Since its opening in RY2019, no nonresidents have received a permit for DG008 (Table 1).

DG008 Mt Goat Drawing Permit Hunt

This map is intended for hunt planning use, not for determining legal property or regulatory boundaries. Content is compiled from various sources and is subject to change without notice. See current hunting regulations for written descriptions of boundaries. Hunters are responsible for knowing the land ownership and regulations of the areas they intend to hunt.

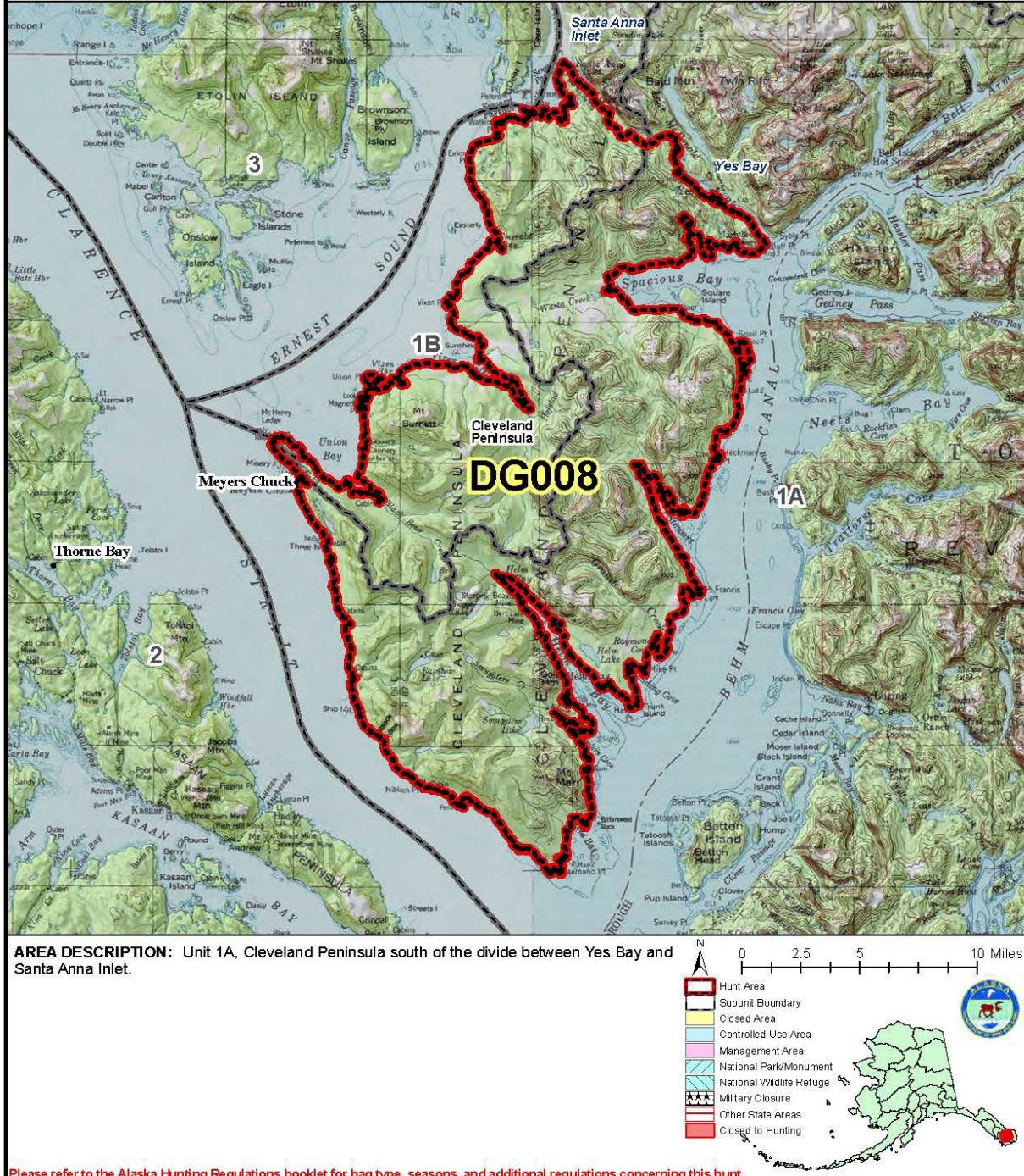


Figure 1. Drawing permit hunt DG008 in Unit 1A, Southeast Alaska.

Table 1. Resident and nonresident permit application and allocation, DG008. NR = nonresident, NR-2DK = nonresidents applying under second degree kindred.

Reg. Year	Hunt	Total # Apps.	# NR Apps.	% NR Apps.	NR-2DK Apps.	% NR-2DK Apps.	# NR Winners	% NR Winners	# NR-2DK Winner	% NR-2DK Winner	# Permits Awarded
2020	DG008	514	34	7	34	7	0	0	0	0	2
2021	DG008	344	4	1	4	1	0	0	0	0	2
2022	DG008	341	10	3	4	1	0	0	0	0	1
2023	DG008	350	24	7	12	3	0	0	0	0	2
2024	DG008	460	16	3	8	2	0	0	0	0	1
2025	DG008	354	13	4	6	2	0	0	0	0	1
2020	DG008	514	34	7	34	7	0	0	0	0	2
2021	DG008	344	4	1	4	1	0	0	0	0	2
2022	DG008	341	10	3	4	1	0	0	0	0	1

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. Due to the small goat population, lack of connectivity with other populations, and a previous closure due to declining goat numbers, the number of permits is not likely to change significantly. If this proposal were adopted, it would ensure that no nonresidents could draw a goat permit for DG008 for the foreseeable future.

If the board adopts this proposal, the hunts will be assigned individual hunt numbers for residents and nonresidents, which will result in nonresidents receiving 20% of the total permits available, if more than 5 permits are advertised.

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

PROPOSAL 53 – 5 AAC 92.003 Hunter education and orientation requirements. Require all Unit 2 wolf trappers to pass an online wolf trapping education quiz prior to trapping wolves in Unit 2.

PROPOSED BY: Craig Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would require all wolf trappers in Unit 2 to pass an online quiz before they trap wolves in Unit 2.

WHAT ARE THE CURRENT REGULATIONS? There are currently no requirements to pass a quiz to trap wolves in Unit 2.

There is a positive customary and traditional use finding for wolves in Unit 2 and an amount reasonably necessary for subsistence of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All trappers that want to trap wolves in Unit 2 would have to pass a quiz before trapping. The goal of this proposal is to reduce the number of non-target animals in traps, particularly deer and black bears in Unit 2.

BACKGROUND: The department uses quizzes, courses, and orientations to ensure hunters have a base of knowledge before pursuing certain animals or participating in certain hunts. Some of these requirements are for selecting a legal animal, while others orient the hunter to a specific hunt area. There are many examples of ways the department provides education for hunters before going afield. For example, during the 2025 statewide Board of Game (board) meeting, the board adopted proposals that require hunters statewide to pass a mountain goat quiz before hunting mountain goats, and required all nonresident hunters to complete an orientation before hunting moose statewide.

During the 2019 board meeting, the board aligned the Unit 2 state wolf trapping season with the federal subsistence trapping season. This changed the start date of the trapping season from Dec. 1 to Nov. 15. This alignment alleviated trappers' frustrations over different start dates on different land ownerships (federal and non-federal). However, it caused increased concern over incidental harvest of non-target species.

Many individuals expressed concerns to the department over deer and bears being caught in snares. The deer rut peaks in mid-November and deer movement is high at that time. This increases the likelihood of deer being caught in snares set for wolves. Also, bears can get caught in snares and traps. The peak time for bears moving into hibernation in Unit 2 is late October through early December. A fair number of anecdotal reports of deer and bears caught in traps and snares are communicated to the department at public meetings, in person, and over the phone. However, few are verified or documented.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal but supports the effort to reduce incidental take. There is clear concern from the public regarding the number of deer and bears being caught in traps, particularly during the wolf trapping season. However, it is difficult to tell exactly how many incidents occur as many go unreported and undocumented. If this proposal is adopted, the department will need to work with local trappers and the Alaska Trappers Association to develop quiz materials. If adopted, the department recommends the board delay implementation to give the department time to develop the materials. There are no other requirements for trapping education or orientation anywhere else in regulation, this would be the first and as such, the department will need substantial time to develop the materials. The board will also need to decide if the quiz needs to be taken once in a lifetime or yearly. Finally, to meet the board's statutory responsibility to the subsistence law, it should consider whether

subsistence regulations continue to provide a reasonable opportunity for subsistence uses for subsistence uses of wolves if the proposal is adopted.

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

PROPOSAL 54 –5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags to be attached to traps and snares in Unit 2.

PROPOSED BY: Ellen Hannan and Michael Douville.

WHAT WOULD THE PROPOSAL DO? This proposal would require trappers in Unit 2 to affix identification materials to their traps and snares.

WHAT ARE THE CURRENT REGULATIONS? There are currently no requirements for trappers to identify their traps or snares in Unit 2.

There is a positive customary and traditional use finding for furbearers in Unit 2 with an amount reasonably necessary for subsistence of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require trappers in Unit 2 to affix identification materials to their traps and snares that identify the owner of the trap. The desired outcome is to be able to identify traps and snares left in the field outside of trapping seasons, and to be able to reunite traps and snares with their owners. Additionally, any federally qualified subsistence users trapping under federal regulations on federal lands in Unit 2, which make up 80% of the unit, would have the option to not place identifying tags on traps or snares.

BACKGROUND: The Board of Game (board) has discussed the requirement for affixing identifying materials to traps and snares at many board meetings throughout the state (Table 1). The first requirement for trap identification tags was a result of the adoption of Proposal 95 at the 2000 Interior board meeting, requiring trap identification tags for traps set above water within a quarter mile of a public maintained road in Units 12 and 20E. Trap identification in Units 1–5 was implemented in regulatory year (RY) 2003, where snares set out of water were required to be marked with the trapper's identification or have a sign with identifying information placed within 50 yards of their trap set; trappers in the Gustavus area were required to mark all traps and snares. At the 2006 Southeast board meeting the board passed Proposal 1, which extended this requirement to all traps and snares in Units 1–5. Because much of the land in Units 1–5 is federally managed, enforcement issues resulted from the regulation due to the lack of a corresponding requirement under federal subsistence trapping regulations. The department successfully worked with the federal Regional Advisory Council to require trap marking through federal regulation (proposal WP12-14) beginning in RY2013. At the 2016 Statewide Board of

Game meeting, the board adopted Proposal 78 to rescind all trap tag requirements in the state of Alaska, which included Units 1–5, 12, and 20E. The department was neutral on that proposal, citing trap tags make enforcement easier but could potentially cause problems for otherwise legal trappers. The Federal Subsistence Board followed suit shortly after, and removed the requirement to mark traps and snares on federally managed lands at their spring 2018 board meeting.

Table 1. History of board proposals regarding trap and snare identification requirements across Alaska, from 1998 to 2025.

Year	Region	Proposal	Effect	Outcome	Affected Units
1998	Interior	99	Establish trap ID requirements	Failed	
		100	Establish trap ID requirements	No Action	
2000	Statewide	18	Establish trap ID requirements	No Action	
		19	Establish trap ID requirements	Failed	
		20	Establish trap ID requirements	No Action	
2000	Interior	94	Establish trap ID requirements	No Action	
		95	Establish trap ID requirements	Carried as Amended	12, 20E
2002	Interior	23	Continue trap ID requirements	Carried	12, 20E
		24	Change trap ID requirements	No Action	
		25	Continue trap ID requirements	No Action	
		129	Establish trap ID requirements	Carried as Amended	Fairbanks Management Area (20B)
2002	Southeast	39	Establish trap and snare ID requirements	Carried	Portion of 1C
2002	Southeast	40	Establish snare ID requirements	Carried as Amended	1-5 except portion of 1C
2004	Statewide	152	Repeal trap ID requirements	Carried	Fairbanks Management Area (20B)
2006	Southeast	1	Standardize trap and snare ID requirements	Carried as Amended	Units 1-5
2008	Statewide	56	Establish statewide trap ID requirements	No Action	
		58	Establish statewide trap ID requirements	Failed	
2008	Interior	59A	Establish trap ID requirements	Carried as Amended	Chugach State Park (14C)
2008	Southeast	33	Repeal trap ID requirements	No Action	
		35	Repeal trap ID requirements	Failed	
2012	Statewide	124	Establish trap ID requirements	Failed	
2015	Southcentral	178	Establish trap ID requirements	Failed	
		179	Establish trapper ID system	No Action	

2016	Statewide	78	Repeal all trap ID requirements statewide	Carried	1-5, 12, 20E, Chugach State Park (14C)
2019	Southeast	13	Establish trap and snare ID requirements	Failed	
		14	Establish trap and snare site ID requirements	Failed	
2022	Central/ Southwest	228	Establish trap ID requirements	Failed	
2025	Statewide	131	Establish statewide trap and snare ID requirements	Failed	

Currently, nowhere in the state is there a state or federal requirement to mark traps with information identifying the trapper. All rural residents of Units 1–5 are considered federally-qualified under federal subsistence regulations; these individuals have the option to trap under either state or federal regulations when trapping on federal lands. As noted above, due to the large percentage of federal lands in Unit 2 this proposal would likely have little affect without a corresponding federal requirement to affix identification materials to traps on federal lands.

Requiring trap identification tags can be helpful in certain circumstances. Trap identification tags may increase compliance with trapping regulations and discourage setting traps in irresponsible locations. Common concerns expressed by the public about the requirement of trap identification tags include (1) tampering of legal sets, and theft of traps for use in illegal trapping activities, (2) harassment of trappers by people who disagree with trapping wild animals, (3) potentially reduced trapping success as a result of animals detecting trap tags via smell or sight, and (4) leaving human scent in the trapping area when law enforcement officers perform routine checks of trap identification tags.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as there is no biological concern, and issues related to traps being set out of season are enforcement issues. Marking tools used to take fish and game resources is not without precedent. For example, shellfish traps and pots must be marked with an anglers first initial and last name, home address, and vessel registration number (AK number).

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

PROPOSAL 63 – 5 AAC 85.035 Hunting seasons and bag limits for elk. Shorten the archery only bull elk hunt by two weeks and add a 2-week bull elk hunt with no weapons restrictions.

PROPOSED BY: Ketchikan Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the DE318 archery draw hunt on Etolin Island from the entire month of September (30 days) to the first 2 weeks (14 days) of September. In addition, this proposal would create a new draw hunt with no weapons restrictions and the season dates of September 16–30.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.035. Hunting seasons and bag limits for elk.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1)	Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south along the midline of Stikine Strait, back to the point of beginning.	

1 bull by drawing permit only, and by bow and arrow only; up to 50 permits will be issued; or	Sept. 1–Sept. 30 (General hunt only)	Sept. 1–Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1–Oct. 31 (General hunt only)	Oct. 1–Oct. 31
1 bull by registration permit only	Nov. 15–Nov. 30 (General hunt only)	Nov. 15–Nov. 30
Unit 3, Zarembo Island 1 bull by drawing permit only; up to 25 permits will be issued	Oct. 1–Oct. 31	Oct. 1–Oct. 31
Unit 3, Bushy and Shrubby Islands, and the Kashevarof Islands	No open season	No open season
Units 1, 2, and the remainder of Unit 3	No open season	No open season

There is a negative customary and traditional use (C&T) finding for elk in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The archery elk draw (DE318) season would decrease from the entire month of September to only the first 2 weeks of September, and a new, nonrestricted weapons drawing hunt would be created during the last 2 weeks of September. Changing the last 2 weeks of September from an archery season to a nonrestricted weapons season could result in an increase in harvest that is unsustainable. Bull elk are more susceptible to harvest during the rut, and the elk rut runs from mid-September through mid-October.

BACKGROUND: In 1985 the Alaska Legislature passed a law that required the introduction of 50 elk to Etolin Island. In spring of 1987, 33 Roosevelt elk (C. e. roosevelti) and 17 Rocky Mountain elk (C. e. nelsoni) were translocated to Southeast Alaska. Roosevelt elk were released at Dewey Anchorage on the southwest side of Etolin Island, and Rocky Mountain elk were released just north of Johnson Cove on the northwest shore of Etolin Island. The department's initial plan was to manage the Etolin Island elk population with the goal of allowing a limited elk hunt when the population reached 250 elk and could sustain a harvest of 20 bulls. Because estimating elk abundance is difficult in the densely forested habitats found in Unit 3, the department has designed a hunt strategy that restricts harvest mainly through a limited drawing permit structure.

By 1996, the board and the department determined that the introduced elk had reached the population level appropriate for hunting. In October of that year, the board established a bull only elk season in Unit 3. The board authorized the department to issue up to 30 elk drawing permits for an October 1–31 season with a bag limit of one bull. The board also made a negative customary and traditional finding for introduced elk in Unit 3 at this time. In 1997, the first year of elk hunting in Southeast Alaska, the department issued a total of 29 bull elk permits, including 27 drawing permits and 2 public raffle permits. In fall 1998, the board increased the number of drawing permits from 30 to 70 and added a 2-week period (September 15–30) for archery-only hunting. In fall 2000, the board increased the number of drawing permits from 70 to 120 and extended the archery season by 2 weeks (September 1–30). In fall of 2002, the board split the DE320 bull elk drawing permit hunt into separate archery (DE318) and rifle (DE322) permit hunts and authorized the department to issue a combined total of up to 300 permits. In fall 2004, the board adopted several changes to the structure of the Unit 3 elk hunt. The DE322 rifle hunt, which had encompassed the entire month of October, was split into 2 separate drawing permit hunts, each 2 weeks long. The board also authorized a late season registration elk hunt (RE325) in Unit 3, which allows permit holders to harvest bull elk within the boundaries of the drawing hunt area during the last 2 weeks of November. Due to concerns about declining harvest and success rates, the department reduced the number of drawing permits in 2007 to 125.

There are currently 2 elk hunt areas in Unit 3. Etolin Island and a collection of small islands to the south make up one area, with Zarembo Island being the second. The state presently offers 3 drawing elk hunts for bull elk on Etolin Island (DE318, DE321, and DE323) and issues a total of 125 drawing permits annually. A late season state registration hunt for bulls is also offered for Etolin Island, with an average of 51 permits issued annually over the last 10 seasons. Between 2015 and 2024, an average of 177 elk permits were issued for Unit 3 Etolin Island elk (Table 1). During this period, an average of 40% of permit holders reported that they had hunted, ranging from 31% in 2015 to 47% in 2019.

Both resident and nonresident hunters are eligible to obtain drawing and registration permits for Unit 3 elk. However, of the 86 total elk permits issued to nonresident hunters between 2015 and 2024, only 26 reported hunting and only 3 were successful.

During the first 10 elk seasons on Etolin Island, an average of 8 bulls were harvested annually, ranging from 1 to 14 bulls (Fig. 1). Over the last 10 seasons, harvest stabilized and an average of 6 bull elk were harvested annually, ranging from 3 in 2023 to 9 in 2017. Most elk during this period were harvested under the first unrestricted weapons drawing hunt (DE321) in October. Archery hunters harvested an average of <1 elk during the September archery only drawing hunt (Fig. 2).

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3, and no data are available to make meaningful elk population composition

estimates for Etolin Island. However, recent aerial surveys combined with anecdotal reports suggest low productivity and recruitment in the Etolin Island elk herd. In July of 2020 a total of 43 cows and only 2 calves were observed during a flight over open alpine habitat on the island. During a survey by department staff in early June 2022, a total of 12 cow elk and no calves were observed and a member of the public reported seeing a total of 26 cows, 1 calf, and 2 bulls in late August. In August of 2025, a local pilot with experience conducting aerial surveys reported seeing a total of 42 cows, 6 calves, and 3 bulls. In summary, the data suggests the Etolin elk population could be much lower than the 250 animals needed to support a hunt.

In 2020, the Federal Subsistence Board determined that rural residents of Units 1–5 customarily and traditionally use elk for subsistence on federal lands in Unit 3. Recently proposals have been submitted to the Federal Subsistence Board to establish federal subsistence elk hunts in Unit 3. During the April 2022 Federal Subsistence Board meeting, the board adopted a proposal which created a federal year-round season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3. The adopted federal elk season mimicked a previous state general harvest elk season designed to prevent the expansion and colonization of elk to islands outside of Etolin, Zarembo, Bushy, Shrubby, and the Kashevarof Islands. During the 2019 Southeast Board of Game meeting, the department asked that the state general harvest elk season be eliminated because there was no evidence to verify that elk had colonized additional islands since their introduction in Unit 3, and anecdotal reports suggested that the hunt was being abused to facilitate the taking of elk from Etolin and Zarembo Islands.

Table 1. Game Management Unit 3 Etolin Island elk permits and harvest, 2015–2024.

Reg Year	Total Permits	Permits Hunted	% Permits Hunted	% Hunter Success	Total Harvest
2015	188	59	31	12	7
2016	197	73	37	7	5
2017	175	81	46	11	9
2018	190	87	46	8	7
2019	184	87	47	8	7
2020	168	74	44	7	5
2021	157	59	38	8	5
2022	174	66	38	8	5
2023	175	60	34	5	3
2024	159	62	39	6	4

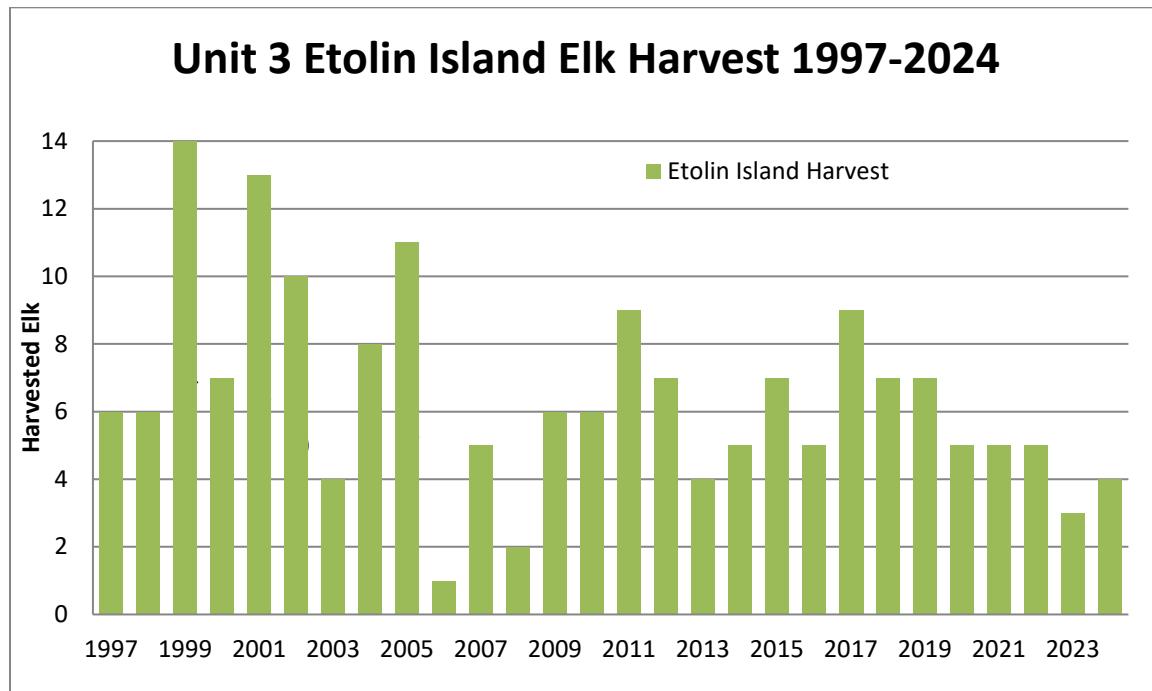


Figure 1. Game Management Unit 3 Elk Harvest, regulatory year 1997–2024.

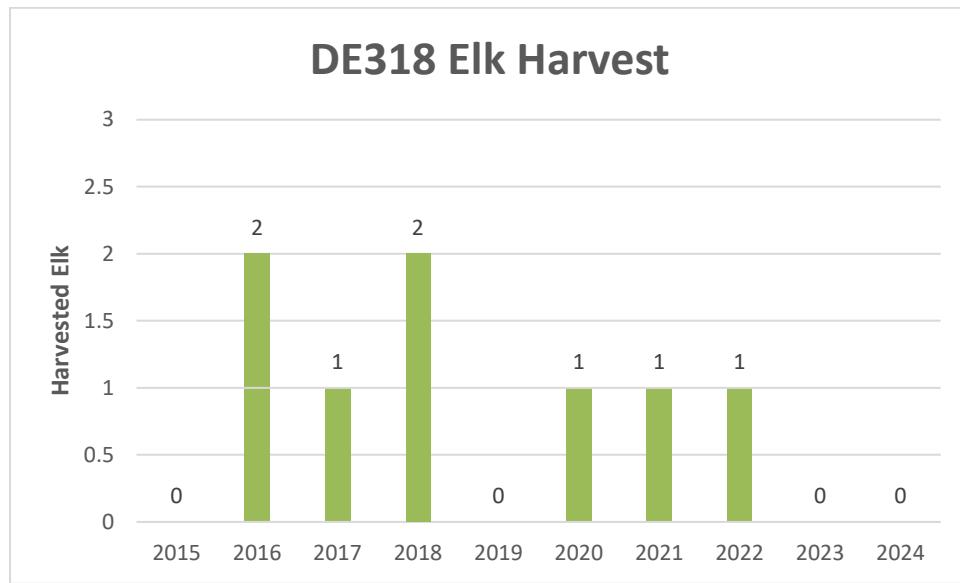


Figure 2. DE318 archery elk harvest, regulatory year 2015–2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative between archery hunters and rifle hunters. If the board adopts the proposal, the department has the ability to issue fewer permits to offset greater success rates associated with rifle hunters. Etolin Island can be sustainably managed under the current or the proposed regulations. If hunter success is high with an any-weapons draw hunt, the number of draw permits provided will need to be limited to prevent overharvest leading to a conservation concern.

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