



November 7, 2019

An Agenda Change Request (ACR 4) has been submitted to the Alaska Board of Game requesting to change 5 AAC 85.045(a)(11) Hunting seasons and bag limits for moose in Unit 13. The proponent is asking the board to change the bag limit of the Community Subsistence Harvest hunt in Unit 13B by imposing the same antler restrictions as the general season harvest ticket hunt.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A) The department is unaware of any error in regulation.
- B) The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.
- C) The proponent suggests that the number of bull moose are declining in the area he hunts. The department has observed a slight reduction in overall abundance within the subunit; however, the bull to cow ratio is above objectives. The department does not believe that there is a reduction in reproduction in subunit 13B.
- D) No unforeseen or unexpected event that would restrict customary and traditional uses has occurred in this area. The fall of 2019 was characterized by hot and dry conditions. Moose were observed in or near water sources or in dense vegetation.
- E) This ACR suggests that there may be an overharvest situation in this area and therefore this section is not applicable.

Moose in Unit 13 are managed for sustained yield with a management objective to maintain between 5,300 and 6,300 moose in the subunit with a fall post-hunting bull to cow ratio of at least 25 bulls per 100 cows. The current population indicates the 13B population is under objectives with approximately 3,643 moose and 34 bulls per 100 cows. The department uses current population information and survey data to determine the number of bulls that do not meet antler requirements that can be harvested in 13B as a proportion of the Unit 13 quota. Restricting the bag limit, especially when there is a harvestable surplus, would likely require re-examination of the board's findings for the community subsistence hunt and perhaps the ANS, in that providing a reasonable opportunity to engage in the community subsistence use pattern described in the finding was based in part on the opportunity to take some bulls without regard to antler restrictions. There is a positive Customary and Traditional use finding for moose in Unit 13 with an amount necessary for subsistence (ANS) of 300—600.

The next regularly scheduled board meeting for Unit 13 is during winter/spring of 2020/2021. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2020 meeting in Fairbanks to allow for additional public and Advisory Committee input.

Sincerely,

A handwritten signature in blue ink that reads "Eddie Grasser".

Eddie Grasser
Director
Division of Wildlife Conservation

