

Alaska Board of Game • Southeast Region Meeting • Wrangell, Alaska
RE: Proposal 65 (HQ-F25-016) • GMU 1B & 3 Moose • 5 AAC 85.045
Position: OPPOSE (including “as amended”)
Submitted by: Kristin “Dani” Gross (Wrangell-area resident)

Board Chair and Board Members:

Thank you for allowing me this time to speak.

My name is Dani Gross. I am a Wrangell-area resident and an intergenerational Stikine River moose hunter. I am speaking today in opposition to Proposal 65. I oppose it as it is written, and I remain opposed even if amended, because the core change—removing antler-based selectivity and replacing it with an “any bull” season—creates biological and social risk that is not justified by the proposal text and is not responsibly adoptable without current biological support, a clearly defined harvest-control mechanism, and crystal clear implementation details.

Core principle: the herd is not a convenience resource—it is a living trust and protection of the herd is paramount.

Protection of a way of life matters too. This herd supports local food security and the intergenerational transfer of skills, ethics, and stewardship. All I know I learned from those who hunted the area before me. Those ethics, skills and relationships to the land are important. Management should not trade that long-term community value for short-term, short lived convenience.

This herd is not a “problem to optimize.” It is a living trust held by the Board on behalf of the people who live here now and the people who will live here after us. For many families, moose hunting on the Stikine is not recreation—it is food security. For many hunters, it is also a precious cultural and ethical relationship to the land that requires restraint, patience, and selectivity. That relationship—and the long-term health of the herd—deserves the Board’s highest level of caution. When a proposal asks the Board to remove a selectivity tool, the standard should be: show the biological case to do so, show the harvest-control plan, and show very clear implementation mechanics. Proposal 65 does none of that.

Executive summary: why Proposal 65 should be rejected

Proposal 65 should be rejected in my opinion for five core reasons:

1. The proposal does not supply the basic biological and program details needed for the Board to responsibly remove a selectivity tool (antler restrictions).
2. The proposal’s mitigation theory—“shorten the season to offset ‘any bull’”—is not supported with data and may concentrate effort and increase early success.
3. GMU 1B’s history shows that “any bull” is not a harmless convenience; the record includes an emergency closure, and later adoption and strengthening of antler restrictions to stabilize harvest numbers and protect the herd.

4. The herd has still not “fully bounced back” to the high-harvest era levels reflected under the earlier any-bull framework; returning to that framework risks repeating the same cycle.
5. If the real issue is enforcement/definition friction around damaged or atypical antlers and hunter–trooper conflict, the remedy is targeted definition/guidance/training fixes, not removal of selectivity across the entire hunt.

What Proposal 65 proposes—and its stated rationale

Proposal 65 requests that the Board remove antler restrictions for the moose hunt in Units 1B and 3 and replace them with a shorter, “any bull” hunt in October (October 1–15).

The proposal’s stated reasons include:

- The current horn restriction has “created animosity” between hunters and the Alaska Wildlife Troopers.
- Southeast moose “have a lot of broken and non-typical horn configurations.”
- A shorter season would cut down harvest “to mitigate” removing the restriction.
- A later season timing would allow breeding of cows prior to the hunt.

Those concerns are very valid and absolutely deserve to be heard. But none of them—on their own or collectively, justify converting a selectivity-based system that is proven to work to an “any bull,” system, especially without current biological justification and clear harvest controls.

Threshold problem: key information is missing, so the Board should not approve this

Proposal 65, as written, does not supply the information the Board needs to responsibly remove antler-based selectivity. It does not clearly specify or support:

- A harvest cap or a permit-number/structure change that would reliably prevent total harvest from increasing when many more bulls become legal.
- How “any bull” would interact with the current permit framework in Units 1B and 3 beyond deleting the bracketed antler language.
- Any biological justification (population trend, cow survival, bull:cow ratio targets, age-structure considerations, or harvestable surplus).
- Any analysis of how hunter success rates would change under “any bull,” especially during a compressed 2-week season.
- Any enforcement and monitoring plan (metrics, reporting, and explicit triggers for rapid adjustment or reversal).

Antler restrictions are not “cosmetic.” They are a highly specialized selectivity tool. Removing selectivity should require a clear biological case to do so and a clear harvest-control plan. Until those are provided, the Board should not consider this change.

The real policy tradeoff: removing selectivity and hoping time limits prevent overharvest

Antler restrictions limit which bulls are legal. “Any bull” removes that selectivity by making many more bulls legal (all of them in fact). A shortened season attempts to reduce harvest by reducing

time. The problem is, those are not equivalent tools. Expanding what is legal typically increases hunter success—especially early on. Compressing the season concentrates effort and amplifies the opening-window effect. If the Board’s only mitigation is time (without a defined harvest-control mechanism tied to current population metrics), the Board is relying on a sliver of hope rather than a solid management plan.

Recovery matters: we should not repeat the cycle that required emergency closure

GMU 1B’s history is a warning light. The record reflects an earlier any-bull framework, a subsequent crash severe enough to prompt emergency closure, and then the adoption (and later strengthening) of antler restrictions as a stability tool. That sequence should matter to the Board. Even looking only at harvest history (which is not a direct correlation to population, but is still very informative), the high-harvest era under the earlier any-bull framework (e.g., averages in the mid-30s to ~40s) is not where we are today. While recent averages in the provided summary overall are trending upward, they are still materially lower. That does not “prove” current population condition—but it does show that today’s system is operating in a different context than the prior any-bull period. The point is simple: if the Board previously needed to tighten selectivity after an emergency closure to stabilize the hunt, then removing that selectivity again should require a unit-specific biological demonstration of safety. Proposal 65 does not provide that demonstration. Until it does, the Board should not gamble with a herd that people depend on.

Local food security and the Southeast weather reality

In Southeast Alaska, local wild food resources are a practical food-security necessity. Extreme weather and supply disruptions mean families cannot rely on outside food systems in the same way as other states. The Stikine/Wrangell moose resource is one of the most important local protein sources available to many residents. That is why policy should prioritize long-term sustainability and equitable local access—not short-term “ease” for a narrower set of hunters.

Equity and access: a two-week “any bull” window concentrates pressure and can reduce local opportunity

A two-week season concentrates effort into a narrow window. When you simultaneously make vastly more bulls legal (“all of them, in fact”), you don’t just change legality—you change behavior: people feel pressure to act fast, competition intensifies, and success concentrates early. That structure predictably produces uneven outcomes across the community. Hunters with the ability to take significant time off work, travel quickly, and stay in the field for long stretches are positioned to capture a larger share of opportunity—while many year-round residents who may have limited schedule flexibility are effectively pushed out.

This is not hypothetical. In small communities, many essential workers can only hunt weekends or a few days at a time. Under an “any bull” two-week window, the odds that the opportunity is largely allocated before those residents can meaningfully participate increases—especially if the Board later feels compelled to “cap” harvest after early success.

The result is a real risk of inequitable access and quite possibly, an uneven distribution of meat across the community—which is contrary to the public-trust nature of this resource. The Board should not adopt a structure that concentrates opportunity into a short, high-success window without explicit equity analysis and a clear harvest-control plan that protects community access.

Finally, this proposal itself points to conflict. Compressing opportunity while expanding legality is likely to increase crowding, competition, and social friction—creating more of the very animosity it claims to want to reduce.

I also want to be clear about a value that matters here: there is nothing about Stikine moose hunting that is inherently “easy.” It takes knowledge, skill, and an incredible amount of tools and equipment. It takes patience, perseverance, and grit. Management should not be reshaped to provide more reward for less effort in trade for reduced protection of the herd and reduced community access. If someone’s primary goal is easier opportunity rather than the responsibilities that come with pursuing a high-value, limited resource, then respectfully—they should consider focusing on other opportunities.

Addressing the proposal’s stated rationales directly

1) Hunter–Trooper “animosity” is not a biological justification

If there is widespread friction between hunters and troopers, that is an administrative problem that should be solved directly- through clearer guidance, consistent reference materials, and training—not by removing selectivity and increasing biological risk. Changing to “any bull” does not solve respect or communication problems. It simply lowers the bar of legality and trades lower enforcement friction for higher biological risk. That is not an acceptable trade for me.

2) Broken/non-typical antlers: solve the definition/enforcement problem directly

If damaged or atypical antlers are driving repeated legal disputes, the fix should be targeted: clarify definitions, address edge cases, and provide consistent guidance. That is what related approaches like Proposal 64 aim to do—solve the definition problem directly. In my opinion, eliminating selectivity is a severe overcorrection.

3) “Shorter season will mitigate harvest” is an unsupported assumption

The proposal asserts that a shorter season will cut down harvest enough to offset the risks of “any bull.” But the proposal does not provide the analysis. When legal opportunity expands, early-season success typically increases. Compressing the season can increase crowding and opening-window pressure. Without a defined harvest-control mechanism tied to current population metrics, this is not responsible management.

4) “Later timing allows breeding prior to the hunt” is not supported in the proposal

If the Board is being asked to change season timing on the claim that it protects breeding, the proposal must provide unit-specific biological basis for that claim (rut timing, vulnerability of prime breeding-age bulls, and expected effect on breeding success). Proposal 65 does not.

In practice, removing selectivity can increase the risk of taking prime breeding-age bulls. A timing shift does not automatically solve that risk, and the Board should not accept this claim without data.

Requested Board action

Proposal 65 asks you to replace a proven selectivity framework with an “any bull” structure, and it asks you to do so without providing the unit-specific biological basis, harvest projection, or harvest controls that would make such a change responsible. When the consequences are borne by a small community and a herd that took years to stabilize, the Board’s duty is to choose the cautious path—because the cost of being wrong is paid in lost opportunity that cannot be quickly restored or compensated for.

For these reasons, I respectfully ask the Board to:

- Vote NO on Proposal 65 (including “as amended”).
- Address the proposal’s stated enforcement and definition concerns with targeted remedies—clear definitions, consistent guidance, and training—instead of removing selectivity for the entire hunt.
- Direct that any future attempt to remove selectivity should include unit-specific biological justification, a quantified harvest projection, and a hard harvest-control plan with monitoring metrics and explicit rollback triggers.

Please vote no—and keep Southeast moose management grounded in stewardship, restraint, and long-term abundance.

Appendix A: GMU 1B harvest history summary (as provided)

The following summary reflects a GMU 1B harvest-history table constructed with information received from the ADF&D Wildlife Biologist Frank Robbins and a graph that was provided to me through a local board member. It illustrates the management timeline and harvest pattern:

1975–1979: average 22 moose taken

1980–1984: average 36 the ADF&G biologist

1985–1989: average 41

1990–1992: average 24

1993: 14

1994: 3 (emergency closure period)

1995: 17 (antler restrictions implemented: spike-fork-50; 3 brow tine on at least one side)

1996: 8

1997: 18

1998–2002: average 17

2003–2007: average 24

2008–2012: average 20 (2009: 2 brow tine on both sides added to spike-fork-50 framework)

2013–2017: average 24

2018–2022: average 18

2023–2025: average 25

This history does not, by itself, prove causation. But, an emergency closure is a serious management signal, and the subsequent adoption/strengthening of antler restrictions reflects a deliberate use of selectivity to effectively stabilize harvest.

Appendix B: Proposal 65 data-and-implementation checklist, what should be answered first:

1. What is the current population trend in Units 1B and 3?
2. What is the recruitment status (or number of calves that meaningfully reach breeding status)?
3. What bull:cow ratio (and age structure) is the management target, and what is the current measured condition?
4. What is the expected change in hunter success under “any bull” and under a two-week season?
5. What is the harvest-control mechanism (permit numbers/structure, caps, emergency triggers) and what data will be used to adjust quickly?
6. How will enforcement/definition disputes be reduced (definitions, guidance, training), and why is removing selectivity necessary to accomplish that?
7. If the Board is told the timing improves breeding outcomes: what unit-specific rut timing and biological evidence supports that claim?

Until these questions are answered with current, unit-specific data, Proposal 65 should not be adopted.

Respectfully submitted,
Dani Gross
Wrangell, Alaska

Year	Average # Moose Taken
1975-1979	22
1980-1984	36
1985-1989	41
1990-1992	24
1993	14
1994	3
1995	17
1996	8
1997	18
1998-2002	17
2003-2007	24
2008-2012	20
2013-2017	24
2018-2022	18
2023-2025	25

Cow hunt by permit only, 2 years

1975-1994: Any bull

Emergency closure

Spike-fork-50, 3-brow tine on at least one side restriction implemented

2009: 2-brow tine on both sides added to spike-fork-50 antler restriction

GMU 1B
Average # Moose Taken

