

*\*The following proposal was submitted with additional information and maps that can be reviewed on the Proposal Book webpage:*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

### **Proposal 116**

#### **5 AAC 85.045; 92.069. Hunting seasons and bag limits for moose; Special provisions for moose and caribou drawing permit hunts.**

Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents as follows:

#### **What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?**

Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents with up to 80 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents. 100 tags total. 80 % to residents and 20% to nonresidents (70% unguided and 30% guide required).

#### **Suggested Regulation:**

19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W

Residents – One bull - with spike-fork, 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM???** [RM653] September 1-20

Or

One bull - by permit available in person in McGrath and Nikolai beginning Jan 15; aircraft prohibited Jan 1-Feb 28. RM655. Feb 1-Feb 28.

Nonresidents – One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side DM681 (unguided, 70% of nonresident tags) & DM682 (guided, 30% of nonresident tags) September 1-20.

Nonresidents may only put in for DM681 or DM682, not both.

If nothing is done, the bull moose population will continue to be overharvested which will further depress the bull to cow ratio, causing a portion of the cow population to go unbred. If these trends continue, the department will have no choice but to implement further restrictions. Restrictions could include further limitations on both resident and nonresident opportunities, shortening the season, deleting the spike/fork regulation, or even an emergency closure or a combination of the aforementioned. Furthermore, the degradation of the land and increase of trash and debris on the Farewell strip and the surrounding area will continue to worsen.

### What is the issue you would like the board to address and why?

I am concerned about the overall moose population of the Farewell area in 19C (RM653, DM681 & DM682) and believe regulations and/or restrictions are in order. I'm equally concerned about the blatant disregard shown by users of the Farewell airstrip, which is Federal Aviation Administration (FAA) lands, surrounding State lands, nearby Cook Inlet Regional Inc (CIRI) lands, Bureau of Land Management (BLM) lands, resources, and wildlife within the area. The amount of trash, fuel drums (empty and full), and All Terrain Vehicles (ATV) left at the taxiway and hidden in the bushes that hunters leave behind is appalling. There are more heavily hunted public lands in Alaska that are cleaner than the Farewell airstrip. The length of the airstrip, the many ATV trails and historic jeep trails that spider out from Farewell and its relative proximity to Anchorage, make it a popular moose hunting destination for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt.

Over the past three decades the moose seasons have been shortened and horn restrictions have been put in place to maintain a healthy moose herd. In 2010 a massive forest fire swept through the area burning over 81,000 acres. Coincidentally or not the past decade has seen an influx of moose hunters. While the fire created prime habitat for moose it inadvertently hurt them by destroying the area's dense cover, thus making it easier for hunters to visually spot moose and making it easier to traverse the area via ATV to pick off any and every legal bull within the area.

The Farewell registration hunt area (See exhibit 1) is comprised of 382 square miles and was created by the Board Of Game (BOG) 5 years ago in RY20 to achieve a more accurate grasp of the number of moose hunters and moose harvested within the Farewell area. See the table below that was provided by the Alaska Department of Fish and Game (ADF&G).

Farewell permit and harvest data for RY21 - RY25.

|      |            | Permits<br>Issued | DNH       | Hunted     | Killed     |
|------|------------|-------------------|-----------|------------|------------|
| 2021 | RM653      | <b>229</b>        | <b>35</b> | <b>193</b> | <b>96</b>  |
| 2022 | RM653      | <b>224</b>        | <b>25</b> | <b>198</b> | <b>104</b> |
| 2023 | RM653      | <b>253</b>        | <b>40</b> | <b>213</b> | <b>96</b>  |
| 2024 | RM653      | 124               | 24        | 100        | 62         |
|      | DM667      | 20                | 6         | 14         | 11         |
|      | 2024 Total | <b>144</b>        | <b>30</b> | <b>114</b> | <b>73</b>  |
| 2025 | RM653      | 142               | 25        | 117        | 52         |
|      | DM681      | 14                | 4         | 10         | 10         |
|      | DM682      | 6                 | 0         | 6          | 4          |
|      | 2025 Total | <b>162</b>        | <b>29</b> | <b>133</b> | <b>66</b>  |

Multiple proposals were submitted at the previous region 3 meeting to address the issues. The BOG passed and implemented a drawing (DM681 & DM682) for nonresidents in 2024 and 2025 of up to 20 permits. With the nonresident draw in place, the 2024 season saw a decrease from 213 participants to 114. However, in 2025 the number of resident participation increased 17%.

As seen in the table above, 2023 saw the largest number of permits issued at 253 with 213 actively participating in the hunt. That equates to 1 moose hunter for every 1.79 square miles

within the Farewell hunt area. Since the implementation of the non-resident draw in RY24, that changed to 1 moose hunter for every 2.87 square miles.

or a bit of perspective, the remainder of game management unit 19C saw 1 moose hunter for every 44 square miles and on average, the same number of bulls are harvested each year within this 382 square mile area as the remainder of the 6,328 square miles of unit 19C (See exhibit 2 with regards to 19C and the Farewell area highlighted within).

To get ahead of the rising resident participation and the declines in the bull-cow ratio, the department issued RM653 Farewell Moose Update on March 4, 2026 (Exhibit 3), which is to put residents on a limited registration hunt of 100 permits and reduce nonresident tags to 10 for RY26.

The department has found that the Farewell area moose population is migratory, based on a cow moose collar study. The study shows that much of the Farewell moose population spends the spring and summer months west of Farewell in unit 19D and migrates east to 19C in the late summer, early fall, spending the fall and winter there. Based on the 2024 Annual Report to the Alaska BOG on Intensive Management plan for Moose with Wolf, Black Bear, and Grizzly Predation Control in Game Management Unit (GMU) 19D East, one can easily conclude that there is a direct correlation between the moose in 19D East and those in the Farewell area. For example, after the removal of 109 bears in 2002 and 2003 in 19D East the number of moose increased across the board and the Farewell moose hunt became popular. The last couple of years have shown significant declines across the board in 19D East and Farewell. The data indicates that the bear population is back and having a direct impact on moose recruitment and thus, declines in harvest. Based on the report it indicates that another 100 or so bears need to be removed from 19D East again to help the moose population rebound and achieve the objective of 1.0 moose per square mile.

According to 2025 ADF&G survey, the bull to cow ratio is 21 to 100 in the Farewell area (See table below provided by ADF&G). According to the department, the ideal ratio is 30-35 bulls to 100 cows for the area and has not reached that standard in the past five years. To get the ratio back up, a cap needs to be put on the number of bulls harvested within the Farewell area.

Composition survey results from the Farewell TCA during 2017-2024.

| Year | Total Moose | Total Calves | Total Bulls | Total Cows | Percent Calves | Calves: cows | Bull: Cow |
|------|-------------|--------------|-------------|------------|----------------|--------------|-----------|
| 2017 | 322         | 55           | 74          | 193        | 17%            | 28:100       | 38:100    |
| 2018 | 544         | 68           | 136         | 340        | 13%            | 20:100       | 40:100    |
| 2020 | 681         | 86           | 148         | 447        | 13%            | 19:100       | 33:100    |
| 2021 | 540         | 61           | 96          | 383        | 11%            | 16:100       | 25:100    |
| 2022 | 465         | 54           | 91          | 320        | 12%            | 17:100       | 28:100    |
| 2023 | 739         | 47           | 153         | 539        | 6%             | 9:100        | 28:100    |

| Year           | Total Moose | Total Calves | Total Bulls | Total Cows | Percent Calves | Calves: cows | Bull: Cow |
|----------------|-------------|--------------|-------------|------------|----------------|--------------|-----------|
| 2024           | 702         | 84           | 125         | 493        | 12%            | 17:100       | 25:100    |
| 2025           | 486         | 50           | 75          | 361        | 10%            | 14:100       | 21:100    |
| 2 Year Average |             |              |             |            | 11%            | 16:100       | 23:100    |

Circumstances such as those the Farewell hunt area is experiencing now occurred in GMU Unit 24 and the northern section of GMU 21D along the Koyukuk River and could serve as case precedent for the Farewell area.

While Units 24 and 21D are much larger in scale and include multiple villages, the percentages of moose hunters versus successful harvest, and the increase in hunting pressure over a 10-year period, is similar. In 1988 the moose harvest success rate was 60%. Eleven years later, with 731 moose hunters, the success rate had dropped to 50%. In addition to human harvest, a significant increase in the area's wolf population took place during this time that took a large toll on the overall moose herd. The Koyukuk River Moose Management Plan (KRMMP) was developed in conjunction with ADF&G Division of Wildlife Conservation and the Koyukuk River Moose Hunters' Working Group (KMWG or working group). The BOG adopted regulatory proposals in the fall of 2000 that were spawned by the working group and in the 2001 spring meeting the BOG voted unanimously to support the process and endorse the KRMMP. The working group established a baseline maximum number of hunters based on moose biology concerns and what is considered a quality hunting experience. The general registration was changed to a draw hunt with separate resident and nonresident drawing pools. Separate draws were established to retain opportunity for nonresidents and commercial guides based on user group history. The working group met after the completion of the 2000 hunting season to review the regulation changes. Members of the working group all agreed that the season was greatly improved and that both local and nonlocal hunters enjoyed a higher quality hunt than in years past. A 2021 moose trend survey summary conducted by the Department of Interior Federal Subsistence Management Program through aerial survey shows a stable and healthy bull to cow moose population.

To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the Farewell area, I suggest establishing a moose draw permit for all user groups.

Based on the rich history of the area, from the 1940's Army air station, the pioneers of the guiding industry and the makeup of the historical user groups, I suggest the Farewell area go to a draw for both residents and nonresidents with up to 80 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents. 100 tags in total. The justification for 100 tags is based on the past 5 years of permits issued, permits used, and harvest data. This data indicates an estimated harvest of 44± bulls a year from the Farewell area. However, it can be expected that the harvest to be slightly higher due to the area being relatively small with lack of heavy cover and easy navigation via ATV.

The implementation of a moose draw for residents in the Farewell area will eliminate the subsistence opportunity during the fall hunting season. However, according to the reports by the ADF&G, only one participant from Ketchikan, one from Sitka and one from North Pole have participated in this hunt in the past five years (Exhibit 4). The report shows no one from the local region has participated in the hunt since the registration hunt was created. Only 5% of 19C's 6,710 square miles would be affected and the winter subsistence hunt RM655 for bull moose shall remain in place for a subsistence opportunity. To my knowledge, there are no year around residents of the area, and the nearest rural community lies 38 air miles away.

In closing, it's a supply and demand situation. The current demand for bull moose in the Farewell hunt area cannot be sustained with the current moose population and its downward trend. Recent regulation changes implementing a draw for non-residents are not enough. The bull to cow ratio continues to decline as does the calf recruitment, while the resident participation continues to increase. If the current users want to keep and maintain a 20-day season with the spike/fork, 50 inch, and or 4 brow point regulation, now is the time to put a cap on the number of hunters within the Farewell area before the area is shut down by Emergency Order.

**Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?**

Yes. I received moose data and the tables listed above from the ADF&G area biologist. I also reached out to the Vice Chairman of the McGrath advisory committee and was told that the committee has been in favor of a draw for quite a while. I was urged to submit the proposal, and they would look at it next winter.

**PROPOSED BY:** Spencer Pape

(OI-F26-061)

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