

**This proposal was submitted with multiple maps that were not included in the proposal book. These maps, along with a color version of the map included within this proposal can be found on the proposal book website: <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>*

Proposal 61

5 AAC 85.045. Hunting seasons and bag limits for moose.

Create a Lower Yukon River Management Area within GMU 18 as follows:

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

Proposal Summary

This proposal would create a Lower Yukon River Management Area (LYRMA) within Game Management Unit 18 and place nonresident fall antlered bull moose hunting opportunity within the LYRMA under a limited draw permit system. Up to 120 nonresident draw permits would be issued annually, each with a bag limit of one bull moose. These permits would be distributed among five distinct draw permit hunt areas within the LYRMA. Each zone would receive 24 permits, structured across three separate hunt periods in September: eight permits for September 1–10, eight permits for September 11–20, and eight permits for September 21–30.

This proposal is intended to address increasing nonresident hunting pressure, growing user conflicts, and conservation concerns expressed by local rural residents, while still preserving opportunity for nonresident hunters.

Proposed Management Area Description

Attached to this proposal are PDF files and screenshots generated using Google Earth that provide a visual reference for the proposed Lower Yukon River Management Area and the five proposed draw permit hunt areas. These materials illustrate the general boundaries and land that would be encompassed by the LYRMA and are intended solely as a conceptual aid to assist the Board in understanding the scope and intent of the proposal. KMZ files have also been created showing the outline of the proposed LYRMA that can be provided if necessary.

The boundaries shown in the attached PDF files and screenshots are not exact measurements, regulatory boundaries, or final management area outlines. They represent only approximate, illustrative depictions of the proposed management area and should not be interpreted as precise or enforceable boundaries. If this proposal is adopted, the official and enforceable boundaries of the LYRMA and the five associated draw permit hunt zones would be developed, reviewed, and finalized by the ADF&G GIS office using appropriate mapping standards. Staff from ADF&G's GIS section were contacted and provided with the proposal before submission, including the approximate outline of the proposed LYRMA boundaries. After reviewing the concept, they indicated that establishing the area would be well within their scope and technical capabilities. While the proposal and geography

may appear complex at first glance, GIS staff did not view the creation of the area as an unusually difficult or burdensome task.

The Lower Yukon River Management Area (LYRMA) would include the lower Yukon River and specified tributaries, extending two miles outward from the outermost water edge reachable by motor-driven boat. Where applied to tributaries, this results in a four-mile-wide corridor (two miles from each shoreline). Four-mile-wide river corridors regulating nonresident moose hunting already exist on numerous drainages in GMU 19 and on the Nowitna river drainage in GMU 21. The phrase “where a motor-driven boat can access” is intentionally consistent with existing Yukon Delta National Wildlife Refuge regulations governing transporters and hunting guides, which are designed to prevent interference with subsistence hunting activities. Aligning with this established regulatory framework ensures clarity, consistency in enforcement, and continued protection of subsistence users.

The upstream limits of the listed tributaries were selected as reasonable approximations of the furthest extent that jet-driven motor boats can typically reach. The use of jet-driven motor boats among local residents has been steadily increasing in recent years, further reinforcing the need to carefully consider navigable access when establishing boundaries that reflect current and evolving patterns of use.

The apparent complexity of the proposed LYRMA boundaries is intentional. The boundaries were designed to be as narrowly tailored as possible to avoid unnecessarily including lands that could be utilized by transporter services or hunting guides, while still fully encompassing areas that are regularly accessed by residents using motor-driven boats for subsistence hunting. The two-mile buffer extending from the outermost shoreline accessible by motor-driven boat is necessary to achieve the intent of this proposal, as it ensures that nonresident hunting pressure in boat-accessible areas is effectively limited without a draw permit and cannot simply shift slightly inland to avoid regulation. This approach is intended to minimize impacts to air-based hunting activities occurring outside of motorboat-accessible areas, while ensuring that boat-based subsistence hunters are not displaced or interfered with by increasing nonresident pressure.

Tributary Boundaries

The coordinates below mark the extent of the proposed LYRMA along the identified tributaries. These boundary points were selected based on where motor-driven boat access is achievable under typical conditions.

River / Tributary	Upstream Boundary (Latitude / Longitude)
Kuyukutuk River	61°57'14.74" N, 161°37'50.20" W
Nageethluk River	62°12'28.91" N, 161°11'03.30" W
Atchulinguk River	62°52'14.75" N, 161°26'06.13" W

East Fork Andreafsky River	63°01'53.81" N, 161°41'58.03" W
Andreafsky River	63°01'34.36" N, 162°01'00.49" W
Allen Creek	62°29'48.98" N, 163°03'00.56" W
Archuelinguk River	62°15'06.32" N, 163°33'05.87" W
Kashunuk Slough 1	61°47'39.48"N, 162°44'26.03"W
Kashunuk Slough 2	61°51'51.59"N, 163°20'31.82"W
Kashunuk River	61°47'12.61"N, 163°38'12.19"W

Nonresident Moose Hunting Pressure (Unit 18)

With assistance from an ADF&G Unit 18 area biologist, preliminary harvest data was collected and reviewed for nonresident hunters who successfully harvested a moose in Unit 18 (remainder) and used a boat as their primary means of transportation. This metric best represents hunting pressure in areas accessible by motor-driven boat along the lower Yukon River.

Year	Nonresident Moose Hunters Afield	Successful Nonresident Moose Hunters
2018	14	9
2019	29	27
2020 (COVID) 11		9
2021	68	59
2022	91	82
2023	174	154
2024	193	162
2025	242	217

This data shows a substantial and sustained increase in nonresident hunting pressure over the last eight years. From 2018 to 2025 that is a 1628.57% increase in nonresident hunting pressure. Based off this data, nonresident hunting pressure will continue to steadily rise year after year if nothing is done.

Rationale and Justification

User Conflict and Subsistence Concerns

Increased nonresident hunting pressure along the Yukon River and its tributaries has led to escalating user conflicts between residents and nonresident hunters. The lower Yukon River in Unit 18 is home to several thousand rural residents, and the area is also becoming increasingly important for non-local Alaska residents seeking to harvest moose for their families. The proposed Lower Yukon River

Management Area (LYRMA) encompasses the navigable waters of the lower Yukon River and its tributaries, which effectively function as the region's road system for Alaska residents. As nonresident hunting pressure has increased, crowding and competition in these travel corridors have intensified, leading to more frequent conflicts on the landscape. These conflicts can directly affect residents' ability to meet subsistence needs and carry out traditional hunting practices.

The managers of the Yukon Delta National Wildlife Refuge (YDNWR) recognized the potential for conflict and addressed it by prohibiting big game transporter services and hunting guides from transporting hunters to YDNWR lands in Unit 18 that are "accessible by motor-driven boat." The proposed LYRMA would encompass the vast majority of these lands. The LYRMA would essentially mirror the YDNWR regulations already in place on commercial users, and create a way to regulate nonresidents who have found ways to access these areas accessible by motor driven boats without the aid of transporter services and circumvent YDNWR regulations.

If any tributary river corridors that were accessible by motor driven boats were excluded from the proposed management area, nonresident hunting pressure would concentrate into those remaining open areas, exacerbating crowding and conflict in those specific areas.

Unit 18 is currently the only Game Management Unit along the Yukon River below the Dalton Highway bridge where a nonresident hunter may harvest a moose under a general harvest ticket in areas accessible by motor-driven boat. From the Dalton Highway bridge downstream, every other GMU through which the Yukon River flows have nonresident moose hunting opportunity on a draw permit system along the Yukon River and its tributaries. The only exceptions are RM838 and RM835. Reaching the RM838 area by boat requires a journey of more than 150 miles up the Koyukuk River from its confluence with the Yukon River and reaching the RM835 area requires more than 100 miles of river travel up the Innoko river from its confluence with the Yukon River.

In contrast, regulations in Unit 18 currently allow unlimited nonresident moose hunting opportunity throughout the Yukon River and its tributaries that serve as the primary transportation routes for resident subsistence users. Along the neighboring Kuskokwim River, there is no open season for nonresident moose hunting in Unit 18, and most river corridors accessible by motor-driven boat in Units 19A, 19B, and 19E are closed to nonresident moose and caribou hunting altogether.

Establishing the proposed Lower Yukon River Management Area (LYRMA) would create a framework to manage nonresident hunting pressure in the boat-accessible corridors of Unit 18 in a manner more consistent with how nonresident hunting opportunity is managed along the remainder of the Yukon River and neighboring Kuskokwim River systems.

Federal Subsistence Board Risk

All public lands within the proposed LYRMA fall within the Yukon Delta National Wildlife Refuge or on lands administered by the Bureau of Land Management (BLM) and all of these lands are in the jurisdiction of the Federal Subsistence Board. The Federal Subsistence Board (FSB) currently allows

access to non-federally qualified users in this area.

However, growing concerns regarding:

- User conflict
- Subsistence interference
- Sustainability of increased nonresident pressure
- Increased reports of wanton waste by nonresident hunters

increase the risk that the FSB could restrict or close the area to all non-federally qualified subsistence users. Such a closure would negatively impact nonlocal Alaska residents who rely on the area for food security and hunting opportunity.

Proactive action by the Alaska Board of Game to reasonably limit nonresident hunting pressure would demonstrate responsiveness to rural concerns and reduce the likelihood of federal intervention. Taking timely, proactive management steps in this area is critical to addressing growing concerns expressed by local residents before conflicts and

Biological and Management Considerations

ADF&G has indicated that Unit 18 currently supports a healthy moose population, and while the increased harvest from nonresidents may not pose a biological concern, it is causing increased user conflicts and crowding, making it more difficult for local residents to secure moose during the fall hunt by traditional means.

Unlimited nonresident September antlered bull harvest does not assist ADF&G in managing moose populations below carrying capacity. Population reduction objectives are best achieved through increased cow harvest. Nonresident hunting pressure in Unit 18 is almost entirely focused on September antlered bull harvest and therefore does not meaningfully contribute to achieving ADF&G population management goals.

The area is increasingly attracting nonresident hunters interested primarily in harvesting bull moose during the fall season, which has led to crowding and increased user conflicts along the Yukon River and its tributaries. Placing nonresident hunters on a fall antlered bull draw permit system while leaving the winter antlerless season open would reduce fall crowding and conflict while preserving opportunities for cow harvest later in the year when fewer hunters are afield.

Maintaining the winter nonresident antlerless season would continue to provide additional opportunity for nonresidents to harvest moose during a period that would result in fewer user conflicts, while also directly supporting ADF&G population management objectives by allowing increased cow harvest, which is the primary tool available to effectively control or reduce moose populations where necessary.

Permit Structure

- Issue up to 120 nonresident draw permits annually for fall antlered bull moose hunts within the LYRMA with a bag limit of 1 bull
- Divide permits among five draw permit hunt areas and three different hunt windows within each zone (see attached PDF files and screen shots from google earth for reference) to distribute pressure evenly along the LYRMA and not allow nonresident pressure to overwhelm one specific area.
- Maintain winter nonresident antlerless season without draw permits

This approach caps nonresident participation in the fall at a sustainable and socially acceptable level while maintaining opportunity. While the proposed reduction in nonresident permits may appear substantial on its face, it is important to recognize that participation by non-local Alaska residents traveling to the area to hunt is also increasing. Reducing nonresident pressure will help address the growing concerns expressed by local residents regarding competition and crowding, while still preserving meaningful hunting opportunity for other Alaska residents to harvest moose.

September Draw Permit Distribution

Area	Dates	Permits Available
Zone 1 DMXXX	Sep 1–10	8
Zone 1 DMXXX	Sep 11–20	8
Zone 1 DMXXX	Sep 21–30	8
Zone 2 DMXXX	Sep 1–10	8
Zone 2 DMXXX	Sep 11–20	8
Zone 2 DMXXX	Sep 21–30	8
Zone 3 DMXXX	Sep 1–10	8
Zone 3 DMXXX	Sep 11–20	8
Zone 3 DMXXX	Sep 21–30	8
Zone 4 DMXXX	Sep 1–10	8
Zone 4 DMXXX	Sep 11–20	8
Zone 4 DMXXX	Sep 21–30	8
Zone 5 DMXXX	Sep 1–10	8
Zone 5 DMXXX	Sep 11–20	8
Zone 5 DMXXX	Sep 21–30	8

This structure creates 15 individual draw hunts that nonresidents may apply for across the season and throughout the proposed management area. By dividing opportunity across three ten-day windows in each of the five zones, nonresident hunting pressure is evenly distributed both geographically and temporally. This prevents nonresident pressure from concentrating in a single area or narrow period of time, reducing the likelihood that one geographic area or portion of the season becomes overcrowded. At the same time, it preserves ample nonresident opportunity to hunt moose in the area.

Consolidating all hunts into a single draw tag for the entire LYRMA — or even establishing five draw hunts, one per zone — was considered. However, that structure carries the risk of concentrating nonresident hunters into a single area or a narrow window of the season. Such concentration could still lead to user conflicts and diminish the intended benefits of creating the LYRMA. By spreading participation geographically and temporally, the proposal meaningfully reduces the likelihood of user conflicts with residents and better aligns with the overall intent of the LYRMA.

This approach represents a fair and balanced framework: it allows nonresidents significant opportunity while placing a reasonable cap on the total number of nonresident hunters present within the LYRMA at any one time. By spreading participation evenly throughout the season and across all zones, it helps reduce the potential for escalating user conflicts.

Importantly, this tag structure creates a framework that would work well for the few local residents who rent out their boats during September to generate income. By maintaining these specific date segments and tag allocations, the proposal continues to support that seasonal economic activity while still addressing user conflict concerns.

Guided Hunting and Transporting on Native Corporation Lands

Guided big game hunting is already prohibited on Yukon Delta National Wildlife Refuge (YDNWR) lands accessible by motor-driven boat within Unit 18. However, Native corporation lands within portions of the Lower Yukon River Management Area (LYRMA) may allow guided hunting when authorized by the landowner. If concerns arise regarding guided hunting demand on Native corporation lands within the LYRMA, the Board could address those concerns using a regulatory framework similar to the one already established in Game Management Units 1, 2, and 3 for black bear hunting. In those units, nonresident hunters who are not accompanied by a registered guide or a resident second-degree of kindred are required to obtain a draw permit, while nonresident hunters using a registered guide and those accompanied by resident relatives remain eligible to hunt under a harvest ticket structure. This structure has been successfully used in Southeast Alaska to manage increasing nonresident participation and hunter pressure, providing a clear precedent for applying a similar framework in areas facing comparable challenges.

The same approach could be applied within the LYRMA if necessary. Under this structure, nonresident hunters who are not accompanied by a registered guide or a resident second-degree of

kindred would be subject to the proposed draw permit structure and allocation within the LYRMA, while nonresident hunters using a registered guide or accompanied by a resident second-degree of kindred could continue to hunt under a harvest ticket within the LYRMA. Allowing nonresident hunters to accompany resident relatives under the second-degree-of-kindred provision is unlikely to create meaningful additional hunting pressure, as this opportunity is naturally limited to situations where a resident family member is present and willing to host the hunt. In contrast, the primary source of increased hunting pressure in many accessible areas has come from growing numbers of do-it-yourself nonresident hunters traveling independently. Structuring the regulation to focus on that segment of hunting participation helps address the underlying pressure concerns while preserving traditional opportunities for residents to share hunting experiences with visiting family members.

Importantly, several existing factors already limit guided hunting pressure within the LYRMA:

- The Yukon Delta National Wildlife Refuge is an active land manager with an established regulatory structure governing commercial users, providing oversight and management of any authorized commercial activity within refuge lands.
- Guided hunting should only occur on Native corporation lands within the LYRMA since the vast majority of public lands with the LYRMA are YDNWR lands and accessible by motor driven boat and guided hunting is already prohibited in those areas under existing YDNWR regulations.
- Unguided hunting by non-native hunters should not occur on Native corporation lands without landowner authorization.

According to staff at the Yukon Delta National Wildlife Refuge (YDNWR) at the time this proposal was written, there are currently no permits issued to any boat-based big game transporters authorizing the use of YDNWR lands along the lower Yukon River and its tributaries. If boat-based big game transporter services are operating on Native corporation lands in the region, they would still retain a substantial pool of nonresident clients who draw permits. In addition, these businesses would continue to be able to market their services to Alaska residents.

Some of the lands included in the proposed LYRMA on the upper portions of the Kuyukutuk and Nageethluk Rivers are BLM lands that are not subject to the same regulations as the YDNWR. As a result, guided hunting or transporting operations could potentially occur in these areas. If concerns are raised by hunting guides or transporters regarding the inclusion of these BLM lands within the LYRMA, the Board of Game would need to determine whether to retain these areas within the management boundary or adjust the upper boundaries of these tributaries to exclude them.

Air Traffic Consideration

Another concern expressed by rural residents is the growing number of hunters utilizing airplanes in the lower Yukon area. Current YDNWR regulation should be preventing commercial users like hunting guides or transporters from dropping hunters in the majority of the proposed LYRMA, but

there still could be other Alaska residents utilizing personnel planes within its boundaries. The board could consider also prohibiting the use of Aircraft for moose hunting within the boundaries of the proposed LYRMA to address this concern. Language from the Koyokuk controlled use area is listed below and could be applied easily to the proposed LYRMA if the board deemed that was an appropriate measure to take. *“The area is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, or parts of moose; however, this provision does not apply to the transportation of moose hunters, their hunting gear, or parts of moose by aircraft between publicly owned airports, or the transportation into the area of game meat that has been processed for human consumption.”*

Conclusion

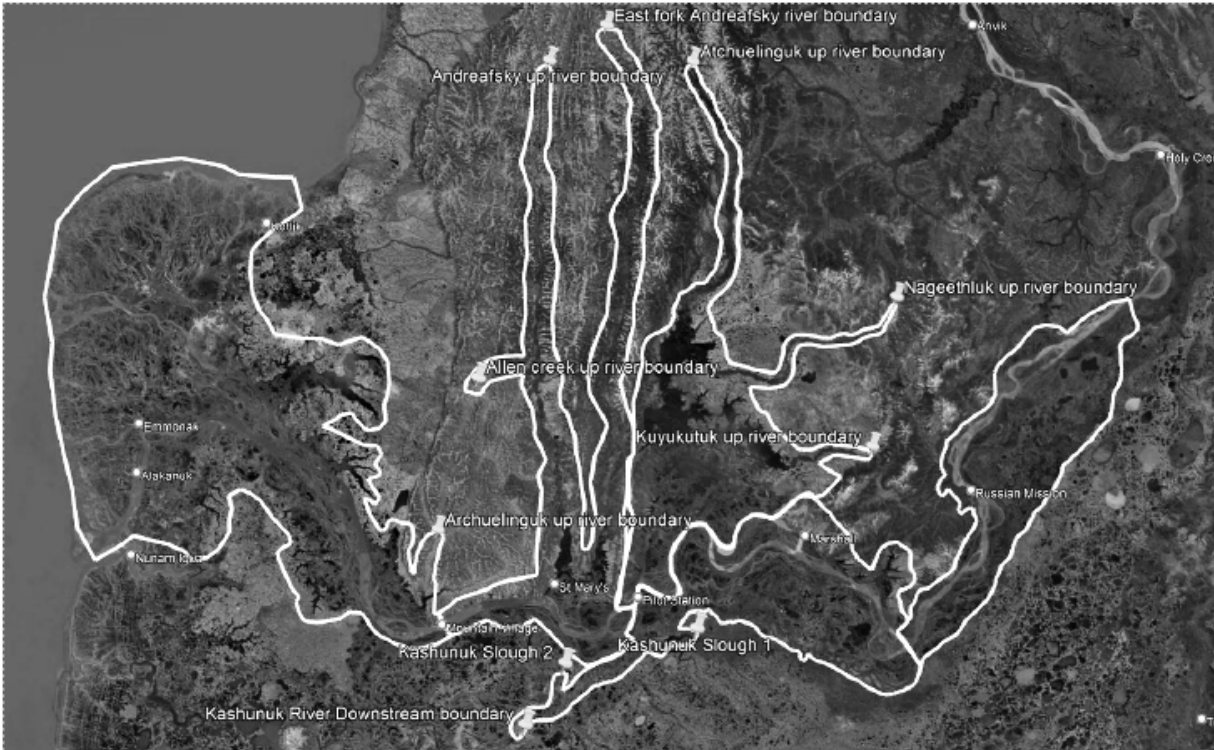
Establishing the Lower Yukon River Management Area and implementing a limited nonresident draw permit system for fall antlered bull moose hunts provides a balanced, proactive solution that:

- Reduces user conflict
- Protects important subsistence opportunity for Alaskan residents
- Aligns with ADF&G population management goals
- Preserves nonresident hunting access
- Decreases the risk of federal subsistence closures
- Demonstrates a good faith effort by the Alaska Board of Game to hear and meaningfully address the concerns raised by rural residents

While creating the LYRMA is a significant and complex undertaking, establishing the management framework now will simplify future management decisions. Once the LYRMA boundaries and structure are in place, the Board will have a clearly defined area and tool that can be adjusted as needed. This allows future changes to permit numbers, hunt structures, or any management decisions to be implemented more efficiently and with greater clarity.

This proposal represents a reasonable and necessary step to ensure long-term sustainability, access equity, and local support in Unit 18 along the Yukon River and its tributaries.

Approximate, illustrative depiction of the proposed management area



**Note from Boards Support: A color version of this map is available online*

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

Address rising user conflicts amongst residents and nonresidents on the lower Yukon River by creating a new management area along the lower Yukon River and its tributaries and place nonresident September bull moose hunting opportunity within the new management area on a draw permit system.

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

Yes, I spoke with many locals of the area and other Alaska residents who are not locals but hunt in the area. I worked with the Mid/lower Yukon AC, YK Delta Federal RAC, and the Mat Su Valley AC. All three organizations supported the proposal unanimously.

PROPOSED BY: Grant Kopplin (OI-F26-036)
