



Alaska Board of Game

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

www.boardofgame.adfg.alaska.gov

Dear Reviewer,

September 2026

The Alaska Board of Game (board) will consider the enclosed regulatory proposals during the board meetings scheduled **for January and March 2027**. The proposals primarily concern changes to hunting and trapping regulations pertaining to the Interior, Western, and Arctic areas of the state, covering Game Management Units 12, 18, 19, 20, 21, 22, 23, 24 ,25 and 26. It also includes proposals for annual reauthorizations for antlerless moose hunts and brown bear tag fee exemptions.

The proposals have been submitted by members of the public, organizations, advisory committees, ADF&G, and other agencies. With the exception of minor edits and clarifications, the proposals are published essentially as they were received, with the insertion of the appropriate Alaska Administrative Code citation and a brief description of the action requested. The proposals are often presented as brief statements summarizing the intended regulatory changes. Proposed changes are also often written in legal format for which bold and underlined words indicate **additions** to the regulation text, and capitalized words in square brackets indicate [DELETIONS].

Readers are encouraged to view all proposals in both proposal books as some proposals may affect other regions and units. Proposals are grouped by each meeting to which they pertain (see Proposal Indices). The proposals are listed in the tentative order in which they are expected to be considered during the meeting. The final order of all proposals to be deliberated on, also known as the “roadmap,” will be available approximately two weeks prior to the meetings.

Public Comment Requested: Before taking action on these proposed changes to the regulations, the board would like to consider your written comments and/or oral testimony on any effects the proposed changes would have on your activities and interests. The board relies heavily on written comments and oral testimony explaining the effect of the proposed changes. Public comments, in combination with advisory committee comments and ADF&G staff reports, provide the board with useful biological and socioeconomic data to form decisions. Anyone interested in or affected by the subject matter contained in the proposals scheduled for the January and March 2027 meetings are encouraged to provide written or oral comments if they wish to have their views considered by the board.

Written comments can be submitted to the board by the announced deadlines as follows:

Online: www.boardofgame.adfg.alaska.gov

Fax: 907-465-6094

Mail: ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526 | Juneau , AK 99811-5526

Comments received by the announced deadlines will be included in the board meeting workbooks and posted on the meeting website for public viewing in advance of the meetings. Comments can also be submitted once the meeting begins. **Please review the additional information for providing written comment and oral testimony to the board on page v.**

Meeting information, documents, and a link to the audio is available through the Board of Game website at www.boardofgame.adfg.alaska.gov or through the ADF&G Boards Support Section. Please watch the website for notices and updates closer to the meeting dates, or sign up at the same link to receive notices about the Board of Game.

To learn what actions the board took on proposals, a preliminary summary will also be posted on the meeting website during each meeting. Afterwards, to understand the board's decisions, a detailed summary will be provided which will direct viewers to the audio recording for the board discussion for each section of proposals.

Persons with a disability needing special accommodations in order to comment on the proposed regulations should contact the Boards Support Section at (907) 465-6098 at least two weeks prior to the scheduled meeting to make any necessary arrangements.

Thank you for your interest and involvement with the Alaska Board of Game and the regulatory process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kari Winkel", is positioned above the printed name.

Kari Winkel, Executive Director
Alaska Board of Game

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Guidelines for Written Comments and Public Testimony

The Board of Game (board) relies heavily on information provided by the public. Explaining the effect of the proposed changes help inform the board members for their decisions on the hundreds of proposals scheduled for consideration each year. The following information provides guidelines and helpful tips to be effective with submitting written comments and oral testimony.

GUIDELINES FOR WRITTEN COMMENTS

Timely submission: Written comments are strongly encouraged to be submitted online at <https://boardofgame.adfg.alaska.gov>, by the set deadline for each meeting, usually two weeks in advance. Comments can be submitted on an online form that will allow comments to be uploaded as a file or entered manually. Boards Support does not accept comments for board meetings via email.

Comments received by the deadline are provided to the board and the public on the meeting information webpages in advance of the meeting. Each public and advisory committee comment is indexed, assigned a public comment ("PC") or advisory committee ("AC") log number, and cross-referenced with proposals. Comments are public documents and part of the board record.

Tips for Commenting on Proposals:

- Please provide your name and community of residence.
- Clearly state the proposal number and your position by indicating "support" or "oppose". If the comments support a modification in the proposal, please indicate "support as amended" and provide your preferred amendment in writing.
- Briefly explain why you support or oppose the proposal to help the board members understand the pros and cons of each issue. Board actions are based on a complete review of the facts involved, not the sum of total comments for or against a proposal.
- For advisory committees (AC), meeting recommendations should reflect why the AC voted as it did. If the vote was split, include the minority opinion. A brief description consisting of a couple sentences is sufficient.
- If including graphs or charts, please indicate the source.
- If using acronyms, please state what the acronym stands for.
- Page limits: For on-time comments, up to 100 single-sided pages or 50 double sided pages from any one individual or organization; during the meeting, comments are limited to 10 single-sided pages or 5 double sided pages.
- If commenting on multiple proposals, please do not use separate pieces of paper.
- If handwriting comments, write clearly, use dark ink and write legibly. Comments will be scanned and photocopied so please use 8 1/2" x 11" paper and leave reasonable margins.

Comments submitted as Record Copies: Once a board meeting has been convened, written comments will be accepted via online form, fax, or hand-delivery. Comments received by Boards Support during the meeting will be logged with a record copy ("RC") number and distributed to the board members two to three times each day. Comments submitted during a board meeting are limited to ten single-sided pages. As a practical matter, comments submitted during the meeting are likely to receive less consideration from the board than those submitted by the deadline.

GUIDELINES FOR ORAL PUBLIC TESTIMONY

Oral hearings are scheduled at the beginning of each regulatory meeting, typically following agency reports, and continue until everyone who has signed up by the announced deadline and is present when called has been given the opportunity to be heard. Advisory Committee (AC) and Regional Advisory Council (RAC) representatives may elect to provide testimony at a later portion of the meetings.

Persons planning to testify at Board of Game meetings must sign up with the Boards Support staff prior to the announced cut-off time. If submitting written or visual content at the meeting to accompany oral testimony, please review the guidelines for submitting written comments.

Once the oral hearing portion of the meeting begins, Boards Support staff will prepare and post a list of testifiers. The chair will call testifiers in the order provided on the list. When it is your turn to testify, please go to the testimony table, press the button on the microphone, and state your name for the record, where you reside and whom you represent, if speaking for an organization. When giving testimony, be sure to reference the proposal number as well as the title or subject matter, and the public comment or record copy log number for any written material accompanying your testimony if applicable. Follow the tips for written comments shown on the previous page.

The board utilizes a light indicator system for timing testifiers. When you begin your testimony, a green light will come on. When you have one-minute remaining, a yellow light will come on followed by a red light or buzzer to indicate your time is up. When you are finished speaking, please stay seated and wait for any questions board members may have regarding your comments. Be aware that when you testify, you may not ask questions of board members or of agency staff. This is your chance to make comments on proposals before the board. If board members and/or department staff need clarification, they will ask you questions. **Please do not use derogatory or threatening language or you will not be allowed to continue speaking.**

The board allows up to two testimonies in any combination of the following, with only one testimony allowed per option: personal testimony, testimony on behalf of an organization, or testimony on behalf of an AC. Each testimony is allotted its own time. If you are providing more than one testimony, you only need to sign up once, entering your name and listing any organization or AC you are representing. Please see Board Support Staff for guidance if needed. When giving more than one testimony, state on the record who you are speaking for before offering comments. For example, give comments for the organization you are representing, then clearly state that you are now testifying for yourself and provide your personal comments.

The length of testimony time will be announced on the agenda prior to each meeting and stated by the board chair at the beginning of the meeting. The board typically allows five minutes for oral testimony for an individual or organization and 15 minutes for ACs and Regional Advisory Councils. Time limits on testimony do not include questions the board members may have for you. Preparing and practicing your testimony ahead of time will help ensure you stay within the time limit, while making your points clear.

Note: Updates related to public testimony and submitting public comments will be provided via advisory announcement prior to each meeting. Please watch the board's website for any updates or sign up to receive announcements via email at <https://www.adfg.alaska.gov/index.cfm?adfg=process.emailsubscription>.



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About the Board of Game & Advisory Committees

Alaska Board of Game

The Board of Game (board) is Alaska's regulatory entity authorized to adopt regulations to conserve and develop the state's wildlife resources and to allocate uses of those resources. This includes establishing open and closed seasons, areas for taking game, setting bag limits, and regulating methods and means. The board consists of seven members, serving three-year terms. Each member is appointed by the governor and confirmed by the Alaska State Legislature.

The board considers regulatory topics on a three-year cycle, holding two to three meetings each year to address proposed regulations on a regional basis. Each year, the board solicits proposals for new regulations and changes to existing regulations. Any individual or organization may submit proposals and offer oral and/or written testimony for the board's consideration. More information about the Board of Game members, process and meeting information is online at: <https://boardofgame.adfg.alaska.gov>

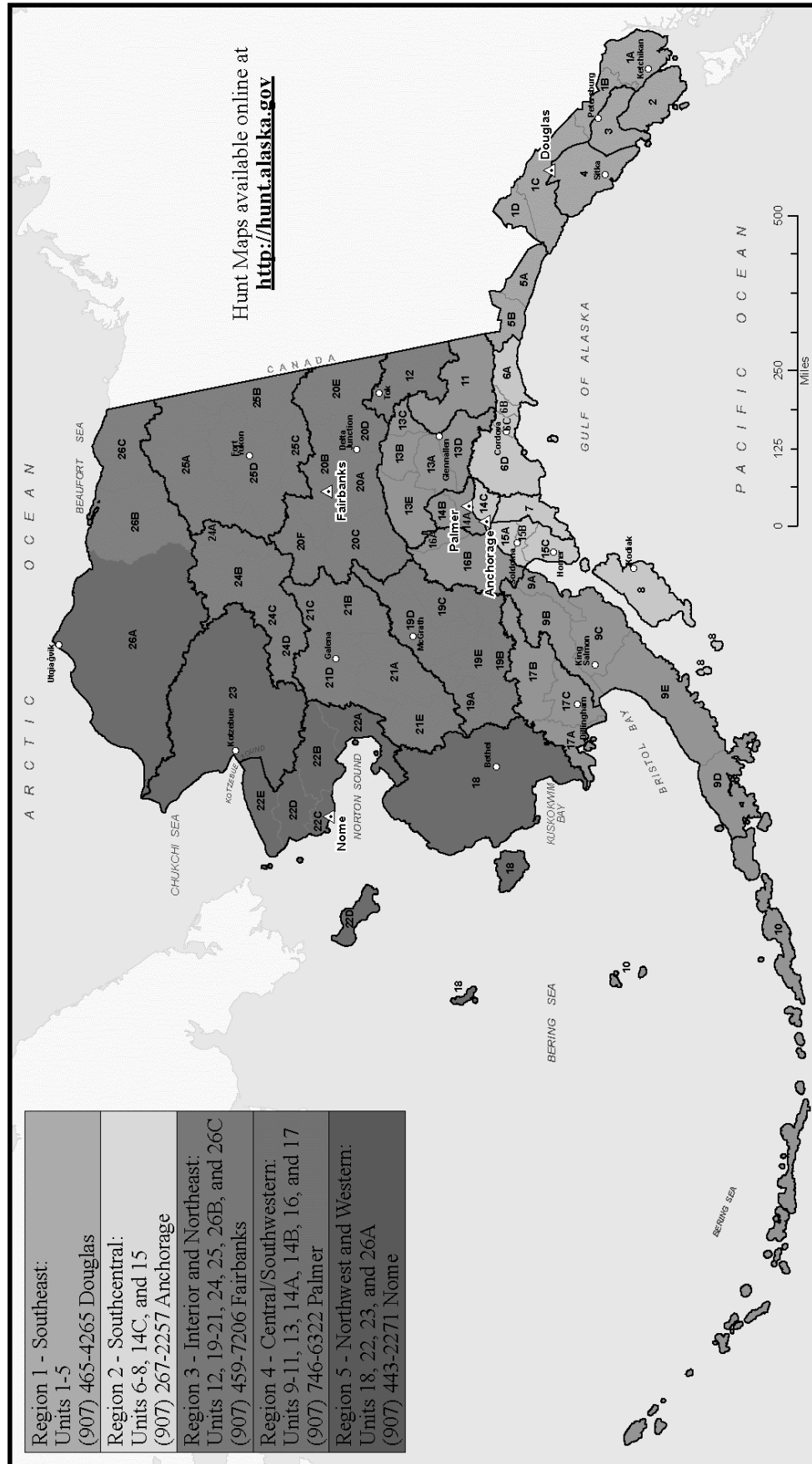
Fish and Game Advisory Committees

The local fish and game advisory committees (ACs) play a key role in the regulatory process for both fisheries and wildlife management. While the boards make the final decisions on proposed regulations, they rely heavily on ACs to offer their local knowledge on fish and wildlife issues of interest by submitting proposals and comments on proposals.

There are 84 ACs in the state; nearly all actively participate in the state regulatory process as well as the federal subsistence process. ACs have up to 15 members and many have community seats designated under regulation. AC members serve three-year terms and are elected by local community members. ACs begin meeting as early as September and throughout the board meeting cycle to review proposals and submit recommendations to the boards. Meetings are open to the public and meeting information is online at: <https://advisory.adfg.alaska.gov>, or from Boards Support Regional Coordinators.

Boards Support Regional Coordinators facilitate AC participation in the regulatory process by coordinating AC meetings and ensuring the ACs have the necessary information to be effective before the boards. Contact information for the Regional Coordinators can be found on the Boards Support staff listing on page xiii.

Region and Game Management Unit Boundaries



Commonly Used Acronyms & Terms

AAC	Alaska Administrative Code
AC	Advisory Committee
ADF&G	Alaska Department of Fish and Game
ANS	Amount Necessary for Subsistence
AS	Alaska Statute
AWT	Alaska Wildlife Troopers
BOG/Board	Board of Game
BGCSB	Big Game Commercial Services Board
C.I.	Confidence Interval
C&T	Customary and Traditional Use
CUA	Controlled Use Area
DHCMA	Dalton Highway Corridor Management Area
DJMA	Delta Junction Management Area
DLP	Defense of Life and Property
DWC	Division of Wildlife Conservation
EO	Emergency Order
FCH	Fortymile caribou Herd
FMA	Fairbanks Management Area
FSB	Federal Subsistence Board
GMU/Unit	Game Management Unit
GSPE	Geospatial Population Estimator
GUA	Guide Use Area
HGL	Harvest Guideline Level
IM	Intensive Management
MFMA	Minto Flats Management Area
NFQU	Non-federal qualified users
NPS	National Park Service
OSM	Office of Subsistence Management, U.S. Dept. of the Interior
RY	Regulatory Year; July 1- June 30
Region I	Southeast Region – Game Management Units 1, 2, 3, 4, & 5

Region II	Southcentral Region – Game Management Units 6, 7, 8, 14C, & 15
Region III	Interior & Eastern Arctic Region Game Management Units 12, 19, 20, 21, 24, 25, 26B & 26C
Region IV	Central & Southwest Region – Game Management Units 9, 10, 11, 13, 14A, 14B, 16 & 17
Region V	Western Arctic & Western Region – Game Management Units 18, 22, 23 & 26A
RAC	Federal Regional Advisory Council
SDA	Same Day Airborne
SHS	Selective Harvest Strategy
USF&WS	U.S. Fish and Wildlife Service
WACH	Western Arctic caribou herd
WRCUA	Wood River Controlled Use Area
YTPCP	Upper Yukon-Tanana Predation Control Program
2DK	Second degree of kindred

Permit Hunt Abbreviations

Some proposals reference specific permit hunt numbers that begin with the initials to indicate the type of hunt and big game animal, followed by three digits for the hunt number:

RB	Registration brown bear
RC	Registration caribou
RG	Registration goat
RL	Registration black bear
RM	Registration moose
RX	Registration Musk ox
DB	Drawing brown bear
DC	Drawing caribou
DG	Drawing goat
DL	Drawing black bear
DM	Drawing moose
DS	Drawing sheep
YS	Youth sheep
DX	Drawing must ox
YM	Youth moose

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<https://boardofgame.adfg.alaska.gov>**ALASKA BOARD OF GAME****2026/2027 Cycle****Tentative Meeting Dates**

Meeting Dates	Topic	Location	Comment Deadline
January 22, 2027 (1 day)	Work Session	Kotzebue National Guard Armory	January 15, 2027
January 23-26, 2027 (4 days)	Western Arctic/Western Region Game Management Units 18, 22, 23, & 26A	Kotzebue National Guard Armory	January 9, 2027
March 19-26, 2027 (8 days)	Interior and Eastern Arctic Region Game Management Units 12, 19, 20, 21, 24, 25, 26B, and 26C	Fairbanks Pikes Waterfront Lodge	March 5, 2027

The Board of Game will meet via web conference to consider Agenda Change Requests following the November 1 deadline.

Total Meeting Days: 13

Proposal Deadline: Thursday, May 1, 2026

Agenda Change Request Deadline: Sunday, November 1, 2026



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Long-Term Meeting Cycle

The Board of Game meeting cycle generally occurs from November through March. The board considers changes to regulations on a region-based schedule that cycle every three years. When the regional regulations are before the board, the following regulations are open for consideration within that region:

- Trapping Seasons and Bag Limits (5 AAC Chapter 84)- All species
- General and Subsistence Hunting Seasons and Bag Limits (5 AAC Chapter 85)- All species (Except antlerless moose hunts as noted below)
- Intensive Management Plans
- Closures and Restrictions in State Game Refuges
- Management Areas, Controlled Use Areas, and Areas Closed to Hunting and Trapping
- Changes to specific to Units or Regions under 5 AAC Chapter 92, excluding Game Management Unit Boundaries in 92.450

Proposals pertaining for the reauthorization of all antlerless moose hunts, 5 AAC 85.045, and all brown bear tag fee exemptions, 5 AAC 92.015, are taken up annually. Changes having statewide applicability to 5 AAC Chapters 92 and 98.005 listed on the following page and Game Management Units are considered once every three years at Statewide Regulations meetings.

The proposal deadline is May 1 every preceding year. Boards Support issues a “Call for Proposals” generally in January before the May 1 deadline, which will also specify which regulations are open for proposed changes.

Topic & Meeting Schedule
Southeast Region - Game Management Units: 1, 2, 3, 4, 5 <i>Meeting Cycle: 2028/2029 2031/2032 2034/2035</i>
Southcentral Region - Game Management Units: 6, 7, 8, 14C, 15 <i>Meeting Cycle: 2028/2029 2031/2032 2034/2035</i>
Western Arctic / Western Region - Game Management Units: 18, 22, 23, 26A <i>Meeting Cycle: 2026/2027 2029/2030 2032/2033</i>
Interior and Eastern Arctic Region - Game Management Units: 12, 19, 20, 21, 24, 25, 26B, 26C <i>Meeting Cycle: 2026/2027 2029/2030 2032/2033</i>
Central and Southwest Region - Game Management Units: 9, 10, 11, 13, 14A, 14B, 16, & 17 <i>Meeting Cycle: 2027/2028 2030/2031 2033/2034</i>
Statewide Regulations* (see next page) <i>Meeting Cycle: 2027/2028 2030/2031 2033/2034</i>
<i>*5 AAC 92.037. Permits for falconry is scheduled every six years: 2027/2028 2033/2034 2039/2040</i>

ALASKA BOARD OF GAME
Statewide Regulations ~ 5 AAC Chapters 92 and 98

General Provisions & Definitions:

- 92.001 Application of this Chapter
- 92.002 Liability for Violations
- 92.003 Hunter Education and Orientation Requirements
- 92.004 Policy for Off-Road Vehicle Use for Hunting and transporting game.
- 92.005 Policy for Changing the Board of Agenda
- 92.008 Harvest Guideline Levels
- 92.009 Policy Obstruction or Hindrance of Lawful Hunting or Trapping
- 92.990 Definitions

Licenses, Harvest Tickets, Reports, Tags, & Fees:

- 92.010 Harvest Tickets and Reports
- 92.011 Taking of Game by Proxy
- 92.012 Licenses and Tags
- 92.013 Migratory Bird Hunting Guide Services
- 92.018 Waterfowl Conservation Tag
- 92.019 Taking of Big Game for Certain Religious Ceremonies

Permits:

- 92.020 Application of Permit Regulations and Permit Reports
- 92.028 Aviculture Permits
- 92.029 (c) – (i)* Permit for Possessing Live Game
- 92.030 Possession of Wolf Hybrid and Wild Cat Hybrids Prohibited
- 92.031 Permit for Selling Skins, Skulls, and Trophies
- 92.033 Permit for Science, Education, Propagative, or Public Safety Purposes
- 92.034 Permit to Take Game for Cultural Purposes
- 92.035 Permit for Temporary Commercial Use of Live Game
- 92.037 Permit for Falconry (to be *addressed every 6 years*)
- 92.039 Permit for Taking Wolves Using Aircraft
- 92.040 Permit for Taking of Furbearers with Game Meat
- 92.041 Permit to Take Beavers to Control Damage to Property
- 92.042 Permit to Take Foxes for Protection of Migratory Birds
- 92.043 Permit for Capturing Wild Furbearers for Fur Farming
- 92.044 Permit for Hunting Bear w/the Use of Bait or Scent Lures
- 92.047 Permit for Using Radio Telemetry Equipment
- 92.049 Permits, Permit Procedures, and Permit Conditions
- 92.050 Required Permit Hunt Conditions and Procedures
- 92.051 Discretionary Trapping Permit Conditions & Procedures
- 92.052 Discretionary Permit Hunt Conditions and Procedures
- 92.057 Special Provisions for Dall Sheep Drawing Permit Hunts
- 92.061 Special Provisions for Brown Bear Drawing Permit Hunts
- 92.062 Priority for Subsistence Hunting; Tier II Permits
- 92.068 Permit Conditions for Hunting Black Bear with Dogs
- 92.069 Special Provisions for Moose Drawing Permit Hunts
- 92.070 Tier II Subsistence Hunting Permit Point System
- 92.071 Tier I Subsistence Permits
- 92.072 Community subsistence Harvest Hunt Area and Permit Conditions

Methods & Means:

- 92.075 Lawful Methods of Taking Game
- 92.080 Unlawful Methods of Taking Game; Exceptions
- 92.085 Unlawful Methods of Taking Big Game; Exceptions
- 92.090 Unlawful Methods of Taking Fur Animals
- 92.095 Unlawful Methods of Taking Furbearers; Exceptions
- 92.100 Unlawful Methods of Hunting Waterfowl, Snipe, Crane
- 92.104 Authorization for Methods and Means Disability Exemptions

Intensive Management and Predator Control:

- 92.106 Intensive Management of Identified Big Game Prey Populations
- 92.110 Control of Predation by Wolves
- 92.115 Control of Predation by Bears
- 92.116 Special Provisions in Predation Control Areas

Possession and Transportation:

- 92.130 Restrictions to Bag Limit
- 92.135 Transfer of Possession
- 92.140 Unlawful Possession or Transportation of Game
- 92.141 Transport, Harboring, or Release of Live Muridae Rodents Prohibited
- 92.150 Evidence of Sex and Identity
- 92.151 Destruction of trophy value of game required in specific areas.
- 92.160 Marked or Tagged Game
- 92.165 Sealing of Bear Skins and Skulls
- 92.170 Sealing of Marten, Lynx, Beaver, Otter, Wolf, and Wolverine
- 92.171 Sealing of Dall Sheep Horns

Use of Game:

- 92.200 Purchase and Sale of Game
- 92.210 Game as Animal Food or Bait
- 92.220 Salvage of Game Meat, Furs, and Hides
- 92.230 Feeding of Game
- 92.250 Transfer of Musk oxen for Science and Education Purposes
- 92.260 Taking Cub Bears & Female Bears with Cubs Prohibited

Emergency Taking of Game:

- 92.400 Emergency Taking of Game
- 92.410 Taking Game in Defense of Life or Property
- 92.420 Taking Nuisance Wildlife

Game Management Units:

- 92.450 Description of Game Management Units

Antlerless Moose Reauthorization:

- 98.005 Areas of Jurisdiction for Antlerless Moose Season

**In 2025, the board delegated authority to ADF&G to make for regulatory changes 5 AAC 92.029 (a) , paragraphs a and b, known as the “clean list”.*



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Alaska Board of Game Members

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**Alaska Department of Fish and Game
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Southeast Region (South of Frederick Sound)
Vacant

Southeast Region (North of Frederick Sound)
Annie Bartholomew (see above contact info)

www.adfg.alaska.gov/index.cfm?adfg=process.regcoordinators

Special Meeting: Musk Ox, Archery, and Ambler Road

**Proposals in this section were deliberated at a special meeting that occurred July 23-24th, 2026 and had been noticed on June 12th, 2026. Proposals 1-3 were deliberated and voted on at that meeting. Proposal 4 was deferred to the Western Arctic Western Region in Kotzebue, scheduled for January. More information about these proposals and the positions taken can be found online at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=07-22-2026&meeting=fairbanks>*

Special Meeting: Muskox, Archery, and Ambler Road 2

Proposal 1: Reauthorize a non-intensive management predator control plan for muskox in Unit 26B 2

Proposal 2: Allow the use of verifiers, clarifiers, and non-electronic scopes in hunts for big game restricted to archery only 7

Proposal 3: Allow the use of verifiers, clarifiers, and electronic scopes in hunts for big game restricted to archery only..8

Proposal 4: Close a 2-mile-wide corridor along the Ambler Road 9

Special Meeting: Muskox, Archery, and Ambler Road

Proposal 1

**Proposal 1 was Carried as Amended with a vote of 7-0. Amended with the exact text from RC22. The summary of action taken on the proposal can be found at*

https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2026-2027/special_7-22-26/soa-7-23-26.pdf and RC22 can be found at https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2026-2027/special_7-22-26/rcs/rc022_ADFG_Updated_Amended_Language_for_Proposal_1.pdf

5 AAC 92.126 (b) Non-Intensive Management Predator Control Plans, Unit 26(B) Musk Oxen Recovery Area.

Reauthorize a non-intensive management predator control plan for muskox in Unit 26B, as follows:

5 AAC 92.126. Non-Intensive Management Predator Control Plans.

(a) Non-intensive management plans are established under this section in areas described in this section.

(b) Unit 26(B) Musk Oxen Recovery Area: Notwithstanding any other provisions in this title, and based on the following information contained in this subsection, the commissioner or the commissioner's designee may conduct selective, lethal, brown bear removal to allow recovery of the musk oxen population in Unit 26(B):

(1) the Unit 26(B) Musk Oxen Recovery Area is established and consists of all lands within Unit 26(B); this recovery program does not apply to any National Park Service or National Wildlife Refuge lands unless approved by the federal agencies;

(2) musk oxen and brown bear objectives are as follows:

(A) Unit 26(B) musk oxen are not managed intensively for high levels of human harvest, but are managed to provide hunting opportunities; the population objective is a minimum of 300 musk oxen that are one year old or older during April surveys; achieving this objective will allow re-establishment of a hunting season and also enhance and maintain viewing opportunity; the harvest objective is 3 - 9 musk oxen annually, once the population reaches 300 musk oxen and a harvestable surplus is available;

(B) the brown bear population objective for Unit 26(B) is to maintain the current estimated population of 200 - 320 bears, while annually removing up to 20 brown bears identified as threatening or killing musk oxen; limiting the number of bears that can be removed will assure that brown bears persist as part of the natural ecosystem and will assure continued brown bear hunting and viewing opportunities;

(3) findings of the Board of Game (board) concerning populations and human use are as follows:

(A) the Unit 26(B) musk oxen population and harvest objectives have not been achieved, based on the following:

(i) the musk oxen population size was estimated at 190 musk oxen in April 2011; musk oxen numbers in Unit 26(B) increased during 1990 - 1995 from 122 to 330 musk oxen; some of this increase in population was the result of immigration from Unit 26(C); during the mid-to-late 1990s, numbers stabilized at around 265 - 300 musk oxen through 2003; subsequently, the population declined to 216 musk oxen by 2006, and during 2007 - 2011, the population in Unit 26(B) slightly declined and stabilized at its current, reduced population size;

(ii) the hunting season for musk oxen in Unit 26(B) has been closed since regulatory year 2006 - 2007; the first hunting season in Unit 26(B) was in 1990; during 1990 - 1997, all hunting was by Tier II permit; in regulatory year 1998 - 1999, the board determined that the amount necessary for subsistence was 20 musk oxen in Unit 26(A) and Unit 26(B), west of the Dalton Highway Management Corridor and established a Tier II hunt; the board also determined that the amount necessary for subsistence was four musk oxen in Unit 26(B), east of the Dalton Highway Management Corridor and established a Tier I registration hunt for residents only; a drawing permit hunt was also established for residents only; three permits were issued annually for bull musk oxen in Unit 26(B), east of the Dalton Highway, and the harvest of up to five musk oxen were authorized by the board; beginning in regulatory year 2005 - 2006, permits were not issued for the drawing and Tier I registration hunts, east of the Dalton Highway in Unit 26(B); this was in response to the sharp decline in musk oxen numbers following 2003; however, the Tier II subsistence hunt west of the Dalton Highway remained open until regulatory year 2006 - 2007, when no permits to hunt musk oxen were issued for any of the hunts;

(B) predation by brown bears was identified as a primary source of mortality on musk oxen and is an important cause of the failure to achieve the population and harvest objectives, based on the following:

(i) during 2007 - 2011, brown bear predation was identified as the primary source of mortality; 62 percent of the documented total adult musk oxen mortality (n=73) was attributed to brown bear predation, which accounted for an average of nine adult musk oxen deaths annually; during the same time period, 58 percent of documented calf mortality (n=45) was caused by brown bear predation; this resulted in an annual average of five calves known to be preyed on by brown bears; over the five years, a total of 74 calves were classified as "missing"; their fates were unknown and not included in the above calculations;

(ii) during 2007 - 2011, the habitat appeared capable of supporting a larger musk oxen population; captured musk oxen were generally in good condition, and birth rates were sufficient to provide for population growth, but growth was not realized because of poor survival; concentrations of some trace nutrients in musk oxen body tissues were believed to be suboptimal

for survival; an imbalance of trace minerals, particularly low copper and selenium with elevated concentrations of zinc and iron, can negatively affect immune systems and make musk oxen more susceptible to diseases and potentially more vulnerable to predation; thus, it is possible that habitat limitations may have been obscured by high mortality due to predation; controlling predation will help answer this question;

(C) reducing predation can reasonably be expected to aid in achieving the objectives, based on the following:

(i) during 2004 - 2011, the population remained relatively stable at around 200 musk oxen; evidence indicates that the number of yearlings being recruited annually approximately equaled the number of adult musk oxen dying annually; if survival rates of either adult musk oxen or calves increase, then the musk oxen population would be expected to increase; reducing predation on adults and calves should change survival rates of one or both; during 1987 - 1995, the annual rate of increase for the entire population was seven percent; this time period should be representative of what population growth rate Unit 26(B) musk oxen could experience if bear predation is reduced and habitat is not limiting; therefore, in a best case scenario, it would take approximately seven years for the musk oxen population to reach 300 musk oxen;

(ii) when the musk oxen population increases to 300 musk oxen one year old or older during April surveys, a hunt will be established if a harvestable surplus is available;

(D) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information; selectively removing brown bears to reduce predation is an experimental approach, based on the hypothesis that relatively few individual bears commonly kill musk oxen; brown bear radiotracking data collected during 1991 - 2007 indicated that several radiocollared adult males were responsible for multiple musk oxen predation events in early spring in a given year or over several years; this suggests that targeting individual bears should be effective, especially for reducing the incidence of multiple kills in spring; most of the predation was caused by male bears before the time when females emerge from dens;

(E) reducing predation is likely to be effective given land ownership patterns, based on the following:

(i) most of Unit 26(B) is state land; the land ownership pattern is 69 percent state land, 29 percent federal land, and 2 percent private land; of the 29 percent federal lands, 12 percent is Bureau of Land Management, and these lands are available for bear control; total land available for bear control is 72 - 74 percent of the unit;

(ii) only two of the 8 - 15 total musk oxen groups in Unit 26(B) occasionally occur on federal lands within the Arctic National Wildlife Refuge;

(F) reducing predation is in the best interests of subsistence users because no harvest is currently taking place; an increase in the population that results in sustainable harvest will benefit all residents;

(4) permissible methods and means are as follows:

(A) hunting of brown bears by the public in Unit 26(B) during the term of the program may occur as provided in the hunting regulations set out elsewhere in this title; however, hunting will be restricted as necessary to maintain the current estimated population of 200 - 320 bears;

(B) notwithstanding any other provisions in this title, the commissioner may allow agents of the state accompanied by department employees, or department employees, to conduct aerial, land and shoot, or ground-based lethal removal of any sex and age of brown bear using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783;

(5) the anticipated time frame for update and reevaluation are as follows:

(A) through June 30, 2034 [2018], the commissioner may authorize removal of bears in the Unit 26(B) Musk Oxen Recovery Area;

(B) annually the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the musk oxen and brown bear populations, and recommendations for changes, if necessary to achieve the objectives of the plan;

(C) the program will be reviewed and modified or suspended if there is no evidence of improved survival or a detectable increase in the Unit 26(B) musk oxen population after three years of bear removal.

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

In 2004, the Unit 26(B) muskox population declined from around 300 muskoxen to 200 muskoxen and the hunting season was closed. In addition, the department was concerned that the population may continue to decline with some risk of extirpation or near extirpation as was observed in the muskox population in neighboring Unit 26(C). The department conducted a series of studies to help determine the cause of the decline, including habitat, nutrition, mineral deficiencies, disease, and predation. The results of those studies indicated that most muskoxen mortalities were caused by relatively few brown bears that specialized on killing muskoxen and that the time period this occurred was relatively short during the calving season.

In March 2012, the Alaska Board of Game adopted a non-intensive management predator control program for the Unit 26(B) muskox population. The program authorized selective lethal removal of brown bears by the Department.

During 2012–2016, the department removed seven total bears that were either predating on muskox or displaying predatory behaviors in proximity to muskox groups. Three bears were

removed in 2012, three in 2013, and one in 2016. All removed bears were males. The department subsequently observed a reduction in both adult and calf mortality caused by bear predation. However, the population did not grow through 2016; a major drowning event led to the loss of approximately 11% of the population, and the population-wide annual recruitment of calves to the short-yearling age class did not appear to improve. Therefore, the program was suspended for re-evaluation.

Following program suspension, in 2018 the muskox population began to increase, surpassing the management objective of ≥ 300 muskoxen by 2020, and a hunt was re-established. The hunt structure includes Tier II and Tier I registration hunts, as well as a limited drawing permit hunt.

During the period of population growth, few brown bear predation events were detected when compared to the period prior to the control program and it is plausible that the impact of removing relatively few bears that specialize on killing muskoxen had a positive effect on population growth that was not immediately detectable when the program was active. This may be in part because the drowning event masked our ability to detect improvements in survival at the population level as a result of decreased bear predation and/or because this population is small, improvements to survival and population growth are difficult to detect.

Since 2023, the population has declined significantly and has dropped below the management objective. The most recent population estimate in April 2026 indicated a total of 220 muskoxen. Mortality of radio collared muskox due to bear predation increased to levels similar to those observed prior to and during bear removal. Given the current rate of decline there is risk that this population may decline to very low levels which will result in hunt closures.

The department and the board are required to consider all the important, relevant, and material factors relating to the sustainability of a replenishable, public, wildlife resource prior to adoption of a regulatory proposal. The proposed non-intensive management predator control plan is designed to grow the Unit 26B muskox population to maintain harvestable surplus to offer hunting opportunity by reducing predation from brown bears. The proposed reinstatement of the non-intensive management program for brown bears is designed to be sustainable because only those bears identified as preying or exhibiting predatory behavior on muskox will be removed. Annual removals under the program, in addition to hunting mortality, are expected to be below or near the annual estimated harvestable surplus. Therefore, all open seasons for the harvest of brown bears will remain open in Unit 26(B).

The department is committed to the conscious application insofar as practicable of principles of management intended to sustain the yield of muskoxen and brown bears. The department has considered the role of predators in the ecosystem, as well as their distribution within the range of the Unit 26B muskox population. Brown bear removal in this area under the proposed plan

will occur in a small geographic area for a limited duration during the calving and post calving season (April–June).

PROPOSED BY: Alaska Department of Fish & Game

(HQ-F26-039)

Proposal 2

**Proposal 2 was Carried as Amended with a vote of 7-0. Amended to not allow the use of prism scopes.*

5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Allow the use of verifiers, clarifiers, and non-electronic scopes in hunts for big game restricted to archery only, as follows:

5 AAC 92.085(10) with the following archery equipment or devices in a restricted weapons hunt that authorizes taking by bow and arrow:

(A) any type of electronic device, or light attached to the bow, arrow, or arrowhead, except a non-illuminating camera or a lighted nock on the end of an arrow, or a scope or electronic sight that does not project light externally;

[(B) SCOPES OR OTHER DEVICES ATTACHED TO THE BOW OR ARROW FOR OPTICAL ENHANCEMENT;]

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

Hunters with poor eyesight may have difficulty participating in big game hunts restricted to archery only, since the use of certain optical enhancement equipment is not legal in big game hunts restricted to archery only. Verifiers are an optical enhancement that allow archers who have trouble seeing things at close distances to see the sight pins on their bows more clearly, and are the equivalent of reading glasses for peep sites. Scopes on bows are an optical enhancement that magnifies the target, the same way scopes are used on rifles. Clarifiers used in conjunction with a lense can also be used on a scope to make the image of the target clearer, the same way the focus of binoculars and scopes are adjusted to see a clearer image. Both forms of technology, verifiers, clarifiers, and scopes, are allowed on archery equipment for big game when used in hunts without a weapons restriction. Neither are legal in hunts restricted to archery only. Battery-powered sight lights enhance the visibility of sight pins in low-light conditions and are allowed on archery equipment for big game when used in hunts restricted to archery only.

PROPOSED BY: Alaska Department of Fish & Game

(HQ-F26-038)

Proposal 3

**Proposal 3 failed with a vote of 0-7.*

5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Allow the use of verifiers, clarifiers, and electronic scopes in hunts for big game restricted to archery only, as follows:

5 AAC 92.085(10) with the following archery equipment or devices in a restricted weapons hunt that authorizes taking by bow and arrow:

(A) any type of [ELECTRONIC DEVICE, OR] light attached to the bow, arrow, or arrowhead, except a non-illuminating camera or a lighted nock on the end of an arrow, or a scope or electronic sight that does not project light externally;

[(B) SCOPES OR OTHER DEVICES ATTACHED TO THE BOW OR ARROW FOR OPTICAL ENHANCEMENT;]

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

Hunters with poor eyesight may have difficulty participating in big game hunts restricted to archery only, since the use of certain optical enhancement equipment is not legal in big game hunts restricted to archery only. Verifiers are an optical enhancement that allow archers who have trouble seeing things at close distances to see the sight pins on their bows more clearly, and are the equivalent of reading glasses for peep sites. Scopes on bows are an optical enhancement that magnifies the target, the same way scopes are used on rifles. Clarifiers used in conjunction with a lens can also be used on a scope to make the image of the target clearer, the same way the focus of binoculars and scopes are adjusted to see a clearer image. Both forms of technology, verifiers, clarifiers, and scopes, are allowed on archery equipment for big game when used in hunts without a weapons restriction. Neither are legal in hunts restricted to archery only. Battery-powered sight lights enhance the visibility of sight pins in low-light conditions and are allowed on archery equipment for big game when used in hunts restricted to archery only.

PROPOSED BY: Alaska Department of Fish & Game

(HQ-F26-041)

Proposal 4

**Proposal 4 was tabled to the Western Arctic Western Region meeting in Kotzebue.*

5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.

Close a 2-mile-wide corridor along the Ambler Road - as follows:

5 AAC 92.510. Areas closed to hunting. (a) The following areas are closed to hunting as specified:

(21) Units 23 and 24:

(A) the area within 1 mile from each side of the Ambler Road, including the driveable surface of the road is closed to hunting.

5 AAC 92.550. Areas closed to trapping. The following areas are closed to the trapping of furbearers as indicated:

(11) Units 23 and 24:

(A) the area within 1 mile from each side of the Ambler Road, including the driveable surface of the road is closed to trapping.

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

The access road for the Ambler Mining District is a proposed 211-mile-long road that will originate from the Dalton Highway in Unit 24A and will extend west through Unit 24 and terminate in the Ambler Mining District in Unit 23. The proposed road is for commercial purposes only, is private, and access to it will be controlled by a locked gate that is staffed 24 hours a day, 7 days a week, 365 days a year. While the area within 1 mile on either side of the road will be closed, hunters and trappers will not be prevented from crossing the corridor or the road. Access across the closed area will be provided to areas open to hunting and trapping.

PROPOSED BY: Alaska Department of Fish & Game

(HQ-F26-042)

Western Arctic & Western Region Meeting

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ALASKA BOARD OF GAME
Western Arctic / Western Region Meeting
National Guard Armory, Kotzebue, Alaska
January 23-26, 2027

TENTATIVE AGENDA

Note: This Tentative Agenda is subject to change throughout the course of the meeting. It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

Saturday, January 23, 8:30 a.m.

OPENING BUSINESS

Call to Order / Purpose of Meeting
Introductions of Board Members and Staff
Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (A List of Oral Reports will be provided prior to the meeting.)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting. Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

Sunday, January 24, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY

BOARD DELIBERATIONS upon conclusion of public testimony.

Monday, January 25, 8:30 a.m.

BOARD DELIBERATIONS

Tuesday, January 26, 8:30 a.m.

BOARD DELIBERATIONS conclude.

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business
ADJOURN

Agenda Notes

- A. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: www.boardofgame.adfg.alaska.gov
- C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-6098 no later than two weeks prior to start of the meeting to make any necessary arrangements.

Regionwide and Multiple and Multiple Units

Proposal 5

5 AAC 92.XXX. New Regulation.

Add a new section to 5 AAC 92 regarding consideration of environmental change in game management decisions as follows:

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

Add a new section as follows

5 AAC 92 XXX Consideration of environmental change in game management decisions

When evaluating proposals and adopting regulations for Game Management Units 22, 23, 24, 25, and 26, the Board shall consider the best available scientific information regarding long term environmental change, including the role of anthropogenic climate change, and its effects on wildlife populations, habitat, and sustained yield.

The Board shall include in its findings a brief statement describing how these factors were considered.

In making decisions, the Board shall recognize that long term environmental change may alter habitat capacity and population dynamics such that some populations may not return to historical levels.

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

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

This regulatory cycle is focused on Arctic and northern Alaska, where the effects of environmental change are among the most pronounced in the state. However, the Board of Game is not explicitly required to consider long term environmental change, including the role of human caused climate change, when making wildlife management decisions in these regions.

A growing body of Alaska based research and Alaska Department of Fish and Game reporting demonstrates that long term environmental change is affecting game populations, particularly Dall sheep and caribou. Recent Board of Game materials document substantial and widespread declines in Dall sheep populations across multiple regions, including declines of approximately 40 to 70 percent in several mountain ranges.

Current research presented to the Board indicates that population trends are strongly influenced by environmental conditions affecting nutrition, pregnancy rates, and lamb survival. Changing weather patterns, including increased frequency of severe winter events, altered snow conditions, and habitat shifts such as shrub encroachment into alpine areas, are identified as key drivers.

Wildlife populations in Alaska have historically exhibited natural fluctuations, and climate variability has always been a factor in northern ecosystems. However, current data presented to the Board indicate a different pattern with more frequent and repeated environmental stressors occurring across multiple regions at the same time.

Similarly, while climate variability includes natural cycles, the scale, rate, and consistency of observed environmental changes in Arctic regions are not well explained by cyclical patterns alone. The available evidence indicates a shift in underlying baseline conditions, with population trajectories increasingly shaped by persistent environmental change rather than periodic variation.

Across northern Alaska and adjacent regions of Canada, some of the continent’s largest remaining caribou herds and mountain sheep populations are experiencing synchronous declines, further suggesting broad scale environmental drivers.

In many areas, populations are likely to persist at lower densities rather than return to historical levels.

If the Board does not explicitly consider these factors, management decisions may continue to rely on assumptions of recovery based on cyclical patterns that may no longer apply, particularly in Arctic regions where these effects are magnified. This creates risk to sustained yield and long term hunting opportunity.

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

This proposal was developed independently, informed by publicly available Alaska Department of Fish and Game materials and current scientific literature on wildlife population dynamics in Alaska and northern North America.

PROPOSED BY: Paul Forward (OI-F26-127)

Proposal 6

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd as follows:

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

Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd to read:

Notwithstanding any other provision of this section, when the Western Arctic Caribou Herd population has declined to 75,000 animals or fewer, the hunting season for caribou from the Western Arctic Herd shall be closed in Units 22, 23, 24B remainder, 24C, 24D, 26A. The season shall remain closed until the department determines that the population exceeds 100,000 animals and that a harvestable surplus exists.

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

The Western Arctic Caribou Herd (WACH) was once the largest caribou herd in Alaska, but over the past two decades it has declined by nearly 70 percent. Without significant management intervention, the herd is expected to continue to decline. A July 2025 photo census estimated the herd at 121,000 caribou, representing an approximately 20 percent decrease since 2023.

At its annual meeting, the WACH Working Group assigned the herd a management status of “Critical, Declining,” based on the current population estimate of below 130,000 and an adult cow survival rate of less than 80 percent. Although specific management actions and harvest recommendations are associated with this status, the Working Group is proposing a hunting closure to reflect the severity of the continued population decline and support long-term recovery.

The Board of Game should establish a temporary closure of the hunting season for caribou from the Western Arctic Caribou Herd (WACH) in Units 22, 23, 24B remainder, 24C, 24D, 26A, if the herd population declines below 75,000. The season should remain closed until the WACH population exceeds 100,000.

Establishing a precautionary regulatory closure in response to the continued decline of the WACH would help prevent further reductions at critically low population levels and support the long-term sustainability of the herd.

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

This proposal was developed by the Western Arctic Caribou Herd Working Group. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

PROPOSED BY: Western Arctic Caribou Herd Working Group (OI-F26-119)

Proposal 7

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in GMUs 23, 22, 26A to four bulls and restrict cow harvest as follows:

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

GMU23, 22, 26a Residents - Four bull caribou total, no cows allowed.

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

The continued decline in the Western Arctic Caribou Herd and the need to lower the bull bag limit and eliminate cow harvest to support reversing the decline.

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

The Kotzebue Sound Advisory Committee originated and supported this proposal unanimously.

PROPOSED BY: Kotzebue Sound Fish & Game Advisory Committee (OI-F26-033)

Proposal 8

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for taking caribou in Units 22, 23, and southwest portion of 26A to four caribou per year per hunter, only one of which can be a cow as follows:

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

5 AAC 85.025. Bag limits for caribou.

Reduce the bag limit for taking caribou in Units 22, 23 and southwest portion of 26A to four caribou per year per hunter, only one of which can be a cow.

RESIDENT HUNTERS: Four caribou [FIFTEEN CARIBOU] total, only one of which may be a cow.

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

The Western Arctic Caribou Herd (WACH) was once the largest caribou herd in Alaska, but over the past two decades it has declined by nearly 70 percent. Data from Alaska Fish & Game biologists document a continual downward trend, with the July 2025 photo census estimating the herd at 121,000 caribou, an approximately 20 percent decline from 2023. Without harvest restriction management actions, continual population decline will remain a significant issue.

At its annual meeting, the WACH Working Group assigned the management level “Critical, Declining” to the herd based on a population less than 130,000 and adult cow survival rate less than 80%. This status indicates that management and harvest actions are necessary to allow for the herd populations to recover.

The WACH Working Group identifies the need to address the current herd decline by limiting the harvest of both bulls and cows for herd stabilization and recovery. In the units identified above, the current bag limit is set at 15 caribou total during the open periods for bulls and cows. The WACH Working Group proposes changing regulations to 4 caribou per person per year, with no more than one cow allowed.

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

This proposal was developed by the Western Arctic Caribou Herd Working Group. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

PROPOSED BY: Western Arctic Caribou Herd Working Group (OI-F26-118)

Proposal 9

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the current caribou bag limit in Units 22, 23, and the southwestern portion of 26A to four bulls per regulatory year and close the cow caribou hunt as follows:

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

5 AAC 85.025, Hunting seasons and bag limits for caribou. Modify the current resident caribou hunting season in Units 22, 23, and 26A as follows:

Unit 22A, North of the Golsovia River drainage

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A

COW] by permit available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22A, Remainder

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY]. Bulls may not be taken Oct 15-Jan 31. [COWS MAY NOT BE TAKEN APR 1-AUG31] Permits available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22B, West of Golovnin Bay, west of the west banks of Fish and Niukluk rivers below the Libby River (excluding the Libby River drainage and the Niukluk River drainage above, the mouth of the Libby River)

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A COW] by permit available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY. COWS MAY NOT BE TAKEN APR 1-AUG31] Permits available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22B, Remainder

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A COW] by permit available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22C

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY]. Bulls may not be taken Oct 15-Jan 31. [COWS MAY NOT BE TAKEN APR 1-AUG 31] Permits available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22D, Pilgrim River drainage

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A COW] by permit available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY. COWS MAY NOT BE TAKEN APR 1-AUG 31] Permits available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22D, in the Kuzitrin River drainage (excluding the Pilgrim River drainage) and the Agiapuk River drainage

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY]. Bulls may not be taken Oct 15-Jan 31. [COWS MAY NOT BE TAKEN APR 1-AUG 31] Permits available online at <http:// hunt.alaska.gov> or in person in Nome and license vendors within Unit 22 beginning June 20.

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

The Western Arctic Caribou Herd (WACH) is undergoing an alarming and ongoing decline, with the most recent population estimate at 120,618 animals representing a significant drop from prior years. This trend underscores the urgent need to implement harvest restrictions across the range of the WACH to ensure the long-term viability of the herd.

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) proposes to modify the current caribou bag limit in Units 22, 23, and the southwestern portion of 26A to four bulls per regulatory year and to close the cow caribou hunt. The SPRAC firmly believes that the herd, at current population levels, does not have a harvestable surplus of cows and that this regulatory restriction is necessary to support the herd’s recovery. The Council also supported a parallel Federal special action request to reduce the harvest limit and eliminate cow harvest under Federal regulations.

In addition to regulatory changes, non-regulatory measures—such as increased enforcement and enhanced hunter education—will also be essential to improving compliance and promoting sustainable harvest practices.

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

The proposal was developed during the March 2026 Seward Peninsula Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-047)

Proposal 10

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in Units 22, 23, and the southwest portion of 26A for resident hunters to four bull caribou and no cows for all open and ‘to be announced’ seasons as follows:

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

Reduce the bag limit for caribou in Units 22, 23, and the southwest portion of 26A for resident hunters from 15 caribou, one of which may be a cow to four bull caribou and no cows for all open and ‘to be announced’ seasons.

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

Reduce the caribou bag limit for residents in Game Management Unit 22, 23, and the southwest portion of 26A to 4 bulls, eliminating cow harvest to assist in reversing the downward population trend of the Western Arctic Caribou Herd (WACH).

The Northwest Arctic Council believes that this reduction will help conserve the WACH for future generations as cows are vital to the ability of the WACH to rebuild. The continued population decline of the WACH highlights the urgent need to implement sustainable practices so that the population may begin to recover, and human harvest is the one controllable factor.

While these measures may be challenging in the short term, they will benefit subsistence users in the long term – and this reduction in bag limits are not intended to be a permanent change; if everyone works together and acts responsibly, the reduction in bag limits and allowable animals could be lifted once the herd rebounds. History shows that recovery is possible—the caribou population rebounded from 75,000 in the 1970s—and with collective action, it can happen again. Given the current rate of decline, the Council is concerned that there could only be a few years remaining to hunting at the current level. This threatens our identity as caribou people. Ultimately, while these changes may be difficult now, they are a necessary investment for long-term conservation of the WACH as well as the well-being of future generations. There is currently a special action request submitted to the Federal Subsistence Board requesting a similar change in bag limits but would still allow one cow. The Northwest Arctic Council supported that request with the modification to remove the language that would allow the take of cows. The Federal Subsistence Board will act on that proposal after this proposal is due, but before the Board of Game meets on this proposal.

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

No. The Council did hear others were putting in similar proposals, but the Council did not work in conjuncture with anyone, although the proposal was drafted after ADF&G staff reports on the herd status and other information at the winter 2026 Northwest Arctic Council meeting.

PROPOSED BY: Northwest Arctic Subsistence Regional Advisory Council (OI-F26-132)

Proposal 11

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in GMUs 22, 23, 26A to 4 bulls per year as follows:

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

Reduce the harvest of caribou to “4 bulls per year” (no cow harvest)

Reduction in harvest limits for caribou for units in the range of the Western Arctic Caribou Herd. Current regulations: 15 per year, 1 of which may be a cow.

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

The SRC had a long discussion about the proposal for a continued reduction in harvest and the impact of cow harvest. Members are concerned for their neighbors who may need a cow to get food on the table—but understand that the population cannot support it. The SRC recognizes that they are making this decision not only for them, but others as well. The SRC believes that though it is incredibly difficult to say ‘no cow harvest’ it is important to make a bold statement in order to protect this herd for the future and that we all need to be proactive. “We are talking about the future of the herd. Taking a little more time to search for bulls is minimal effort.”

After this voting to submit this proposal, the SRC voted to support with a modification the WSA26-01 with the same language of “reducing the harvest of caribou in Unit 22, 23, 26ASW to 4 bull caribou, no cows.” The SRC believes it is important to align state and federal regulations for the same units above.

The SRC states that since this is a shared herd, there is value in aligning regulations across its range and we all must work together.

The SRC also asked NPS and other agencies to continue outreach, specifically highlighting why there should be no harvest of cows, and let people know the more extreme regulations that could occur if the WACH does not make a rebound. Finally, the SRC reminded everyone that the regulations are not set in stone, we need to do something now and hope we can increase again in the future.

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

This proposal was written by the Kobuk Valley National Park Subsistence Resource Commission at their March 12-13 meeting in consultation with local ADFG caribou biologist.

The SRC is a nine-member Federal Advisory Council created in ANILCA 808. The SRC has three seats assigned by the Governor of Alaska.

The proposal will be presented to the Cape Krusenstern National Monument Subsistence Resource Commission and the Northwest Arctic Regional Advisory Council. The proposal will also be shared with the Kotzebue AC on March 23, and other local ACs.

PROPOSED BY: The Kobuk Valley National Park Subsistence Resource Commission (OI-F26-009)

Proposal 12

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the caribou bag limit in GMUs 23 and 26A to 5 bulls and eliminate cow harvest as follows:

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

FIVE BULL CARIBOU TOTAL. [FIFTEEN CARIBOU TOTAL, ONLY ONE OF WHICH MAY BE A COW]

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

The WAH has continued to decline to 121,000, below the management objective of 200,000. To address this we recommend eliminating all cow caribou harvest and reducing the bag limit to 5 bull caribou per hunter per year in that portion of GMU 26A that is the Colville River drainage upstream from and including the Nuka River, and drainages of the Chukchi Sea south and west of, and including the Kuk and Kugrua drainages and the portion of GMU 23 north of and including the Singoalik River drainage.

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

Developed by the North Slope Advisory Committee.

PROPOSED BY: North Slope Fish & Game Advisory Committee (OI-F26-021)

Proposal 13

5 AAC 85.025(a). Hunting seasons and bag limits for caribou.

Eliminate the cow caribou season for the Western Arctic Herd (WAH) in Units 22, 23 and the SW portion of 26A, as follows:

5 AAC 85.025(a)(17) is amended to read:

Open Season	Resident	
Units and Bag Limits	(Subsistence and General Hunts)	Nonresident Open Season
(17)		
Unit 22(A), that portion north of the Golsovia River drainage		
RESIDENT HUNTERS: 15 bulls [CARIBOU] total, by registration permit only[, ONLY ONE OF WHICH MAY BE A COW; COW CARIBOU MAY NOT BE TAKEN APR. 1 - JUNE 30]	July 1 - June 30	
NONRESIDENT HUNTERS: 1 bull	Aug. 1 - Sept. 30	
Unit 22(B), that portion west of Golovnin Bay, and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage		
RESIDENT HUNTERS: 15 bulls [CARIBOU] total, by registration permit only[, ONLY ONE OF WHICH MAY BE A COW; COW CARIBOU MAY NOT BE TAKEN APR. 1 - APR. 30]	Oct. 1 - Apr. 30	

up to 5 **bulls** [CARIBOU] per day
during the period May 1 -
Sept. 30, a season
may be announced by
emergency order[; COW
CARIBOU MAY NOT BE TAKEN
APRIL 1 - AUG 31]

(Season to be announced
by emergency order)

NONRESIDENT HUNTERS:
1 bull; during the period Aug.
1 - Sept. 30, a season may be
announced by emergency order

(Season to be
announced by
emergency order)

Remainder of Unit 22(B)

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:
1 bull;

Aug. 1 - Sept. 30

Unit 22(D), that portion in
the Pilgrim River drainage

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - APR. 30]

Oct. 1 - Apr. 30

up to 5 **bulls** [CARIBOU] per day;
during the period
May 1 - Sept. 30, a season
may be announced by
emergency order[; COW
CARIBOU MAY NOT BE TAKEN
APRIL 1 - AUG. 31]

(Season to be announced by
emergency order)

NONRESIDENT HUNTERS:

1 bull; during the period
Aug. 1 - Sept. 30, a season
may be announced by
emergency order

(Season to be
announced by
emergency order)

Unit 22(D), that portion in
the Kuzitrin River drainage
(excluding the Pilgrim River
drainage) and the Agiapuk
River drainage, including
the tributaries

RESIDENT HUNTERS:

15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:

1 bull

Aug. 1 - Sept. 30

Unit 22(E), that portion east
of and including the
Sanaguich River drainage

RESIDENT HUNTERS:

15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:

1 bull

Aug. 1 - Sept. 30

Remainder of Unit 22

RESIDENT HUNTERS:
 5 **bulls** [CARIBOU] per day; by
 registration permit only, during
the period Feb. 1 – Oct. 14]; COW
 CARIBOU MAY NOT BE TAKEN
 APR. 1 - AUG. 31; BULL
 CARIBOU MAY NOT BE TAKEN
 OCT. 15 - JAN. 31]

(Season to be announced
 by emergency order)

NONRESIDENT HUNTERS:
 1 bull; during the period Aug.
 1 - Sept. 30 announced by

(Season to be
 emergency order)

5 AAC 85.025(a)(18) is amended to read:

Open Season Units and Bag Limits	Resident (Subsistence and General Hunts)	Nonresident Open Season
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(18)

(B) on or after July 1, 2025, the hunting seasons and bag limits for caribou in Unit 23 are as follows:

Unit 23, that portion north
 of and including the
 Singoalik River drainage

RESIDENT HUNTERS:
 15 **bulls** [CARIBOU] total, by
 registration permit only[,
 ONLY ONE OF WHICH MAY BE
 A COW;]

July 1 - June 30

NONRESIDENT HUNTERS:
 1 bull, by drawing permit only,
 up to 300 permits may be issued
 in combination with the
 remainder of Unit 23

Aug. 1 - Sept. 30

Remainder of Unit 23

RESIDENT HUNTERS:
 15 **bulls** [CARIBOU] total, by
 registration permit only[, ONLY

July 1 - June 30

ONE OF WHICH MAY BE A COW;
COW CARIBOU MAY NOT
BE TAKEN JULY 1 - AUG. 31 OR
APR. 1 - JUNE 30]

NONRESIDENT HUNTERS:
1 bull, by drawing permit only,
up to 300 permits may be issued
in combination with that portion
of Unit 23 north of and
including the Singoalik
River drainage
5 AAC 85.025(a)(21) is amended to read:

Aug. 1 - Sept. 30

Open Season	Resident	
	(Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		

(21)
Unit 26(A), that portion
within the Colville River
drainage upstream from
the Nuka River and drainages
of the Chukchi Sea south and
west of and including the
Kuk and Kugrua River
drainages

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW;]

July 1 - June 30

NONRESIDENT HUNTERS:
1 bull

July 15 - Sept. 30

...

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

The Western Arctic caribou herd (WAH) has historically been the largest caribou herd in Alaska and has provided subsistence opportunity for up to 40 rural communities and other Alaskans across the state. This herd has a positive intensive management (IM) finding and a population objective of at least 200,000 caribou, and a harvest objective of 12,000-20,000 caribou. The WAH has been below the IM objective since

2021 (188,000 caribou). The long-term historical harvest for this herd has been estimated at 12,000+ caribou annually and the estimated harvestable surplus (HS) has been below 12,000 animals since 2020.

Despite regulatory changes that decreased bag limits and attempted to reduce the harvest of cows across Units 22, 23 and the western portion of 26A that took effect July 1, 2024, the WAH population has continued to decline. The HS for the WAH has decreased concurrently with the population decline and is estimated at 5,800 bulls and zero cows based on the 2025 census (121,000 animals). It is estimated that the annual harvest of cows is approximately 4,000 at present.

The HS is nearing the lower end of the combined amount reasonably necessary for subsistence uses (ANS) of 8,000-12,000 caribou from the WAH and Teshekpuk (TCH) herds, (5AAC 99.025). Continued decline from either or both of these herds will likely lead to an inability to provide for the ANS in the near future. Elimination of cow harvest has been identified as necessary step towards slowing the population decline.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-028)

Proposal 14

5 AAC 85.025. Hunting seasons and bag limits for caribou.

In Units 22 and 23, caribou taken by nonresident hunters and hunters ineligible for federal subsistence harvest under drawing permit hunts may be taken by bow and arrow only as follows:

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

Amend regulations for caribou hunting in Units 22 and 23 as follows:

In Units 22 and 23, caribou taken by nonresident hunters under drawing permit hunts may be taken by bow and arrow only. In addition, in Units 22 and 23, caribou taken under RC907 by hunters who are not eligible for federal subsistence harvest may be taken by bow and arrow only.

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

The Western Arctic Caribou Herd is experiencing a substantial population decline. This decline is occurring in Arctic regions where environmental changes are occurring rapidly and at a larger magnitude than in other parts of North America.

While the causes of the decline are multifactorial, it is widely accepted that reducing harvest during a period of population contraction is an appropriate management response. At present, non-local, non-subsistence harvest in Units 22 and 23 remains relatively efficient due to the use of modern firearms.

Recent federal actions have restricted non-local caribou hunting on federal public lands in this region. As a result, current regulations differ between federal and state lands, creating inconsistency in management and hunter expectations.

If no changes are made at the state level, harvest opportunity and pressure may become unevenly distributed, potentially concentrating effort on state lands while federal lands remain closed. This may reduce the effectiveness of conservation measures intended to protect the herd.

At the same time, non-local hunting provides economic benefit to communities in the region. Eliminating hunting opportunity entirely would reduce these benefits and remove participation by a group that often contributes to conservation funding and advocacy.

This proposal addresses the need to reduce harvest pressure while maintaining hunting opportunity, improving consistency across land designations, and supporting continued economic activity.

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

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Paul Forward (OI-F26-125)

Proposal 15

5 AAC 85.025. Hunting seasons and bag limits for caribou.

For all non-local, non-subsistence hunters participating under RC907 registration permits and general hunt conditions, restrict methods and means to bow and arrow only as follows:

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

Amend regulations for caribou hunting in Units 22 and 23 as follows:

For all non-local, non-subsistence hunters participating under RC907 registration permits and general hunt (HT) conditions, restrict methods and means to taking caribou by bow and arrow only.

This restriction applies only to non-local, non-subsistence hunters and does not alter existing subsistence or local hunting regulations.

This change is intended to reduce overall harvest by decreasing harvest efficiency while maintaining opportunity for participation.

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

The Western Arctic Caribou Herd is experiencing a substantial population decline. This decline is occurring in Arctic regions where environmental changes are occurring rapidly and at a larger magnitude than in other parts of North America.

While the causes of the decline are multifactorial, it is widely accepted that reducing harvest during a period of population contraction is an appropriate management response. At present, non-local, non-subsistence harvest in Units 22 and 23 remains relatively efficient due to the use of modern firearms.

Recent federal actions have restricted non-local caribou hunting on federal public lands in this region. As a result, current regulations differ between federal and state lands, creating inconsistency in management and hunter expectations.

If no changes are made at the state level, harvest opportunity and pressure may become unevenly distributed, potentially concentrating effort on state lands while federal lands remain closed. This may reduce the effectiveness of conservation measures intended to protect the herd.

At the same time, non-local hunting provides economic benefit to communities in the region. Eliminating hunting opportunity entirely would reduce these benefits and remove participation by a group that often contributes to conservation funding and advocacy.

This proposal addresses the need to reduce harvest pressure while maintaining hunting opportunity, improving consistency across land designations, and supporting continued economic activity.

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

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Paul Forward (OI-F26-126)

Proposal 16

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Restrict nonresident caribou harvest in GMUs 26A, 23, and 22 as follows:

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

NO HARVEST [ONE BULL]

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

The WAH has continued to decline to 121,000, below the management objective of 200,000. To address this we recommend eliminating all non-resident caribou harvest in GMU 26A, 23, and 22. Because residents of Alaska depend on this herd to feed their families and are restricting their harvest we don't believe non-residents should be harvesting caribou from the WAH until the population meets or exceeds the management objective of 200,000 animals.

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

Developed by the North Slope Advisory Committee

PROPOSED BY: North Slope Fish & Game Advisory Committee (OI-F26-023)

Proposal 17

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close caribou hunting to non-residents in units 22, 23, 26A as follows:

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

Non-resident hunting of caribou in units 22, 23, 26A

Closure to non-resident hunting in units 22, 23, 26A

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

Justification: We must minimize stress of the WACH wherever possible. If subsistence users are taking their second reduction in 3 years, non-resident hunting needs to be closed. The SRC believes it is important to do whatever we can to keep food on the tables of local families of the 40 communities that rely on this herd. The KOVA SRC has submitted a proposal to reduce subsistence harvest in units 22, 23, 26ASW to 4 bull caribou (from 15 caribou, 1 of which may be a cow).

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

This proposal was written by the Kobuk Valley National Park Subsistence Resource Commission at their March 12-13 meeting in consultation with local ADFG caribou biologist.

The SRC is a nine-member Federal Advisory Council created in ANILCA 808. The SRC has three seats assigned by the Governor of Alaska.

The proposal will be presented to the Cape Krusenstern National Monument Subsistence Resource Commission and the Northwest Arctic Regional Advisory Council. The proposal will also be shared with the Kotzebue AC on March 23, 2026, and other local ACs, and any other RACs or groups who are interested.

PROPOSED BY: Kobuk Valley National Park Subsistence Resource Commission (OI-F26-010)

Proposal 18

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close all nonresident caribou hunts in Units 22, 23, and 26 as follows:

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

Close all nonresident caribou hunts in Units 22, 23, and 26.

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

Close all nonresident caribou hunts in Units 22, 23, and 26. The Northwest Arctic Council also submitted a proposal to reduce resident bag limits to four a year, with no cow harvest due to our extreme concern over the population trajectory of the Western Arctic Caribou Herd (WACH). With the sacrifices that subsistence users are making, non-local hunters need to also share the burden of conservation, and the Council believes that the closure is necessary for the continuation of subsistence uses and for the conservation of the WACH.

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

No. The Council did hear others were putting in similar proposals, but the Council did not work in conjuncture with anyone.

PROPOSED BY: Northwest Arctic Subsistence Regional Advisory Council (OI-F26-131)

Proposal 19

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Limit the WACH bag limit in Unit 22 and 23 to four caribou total, with the same season dates currently in the subunits as follows:

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

Limit the WACH bag limit in Unit 22 and 23 to four caribou total. Keep the same season dates we currently have in the various subunits.

Caribou

Resident

Unit 22 & Unit 23

4 caribou total

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

Declining Western Arctic Caribou Herd and Continued High Bag Limits

With further decline of the Western Arctic Caribou Herd, it’s time to reconsider a 15 caribou bag limit, one of which may be a cow.

During the last board cycle, there were several proposals to lower the WACH bag limit in Unit 23 from 5 per day to 4 caribou total, one of which may be a cow. RHAK supported that lower bag limit, though we had concerns about taking any cows with the herd in steep decline.

The board heard from rural stakeholders who felt that the proposed lower bag limit went too far, and the board amended Proposal 36 to lower the bag limit to 15 caribou total, one of which may be a cow, and included Unit 22 in that bag limit. We did not agree with such a high bag limit when the herd was in such decline, and we do not agree with it now.

RHAK testified in support of a Wildlife Special Action WSA 26-03 at a hearing on April 9, 2026 to lower the bag limit in Unit 23 to 4 caribou total, one of which may be a cow. However, after talking to biologists, with the herd in such drastic decline we don’t believe any cows should be allowed to be taken. Those are the animals we need for recruitment and we just can’t afford to take any at this time.

We understand that when caribou are available from mid-October to mid-November that larger bulls may be in rut and the meat is no good, and during that time period it is preferred to take cows. If the board doesn't agree to eliminate all cow harvests, another option may be to just allow the opportunity to take one cow during the time period when bulls are in rut.

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

PROPOSED BY: Resident Hunters of Alaska (OI-F26-097)

Proposal 20

5 AAC 92.106. Intensive management of identified big game prey populations.

Establish an Intensive Management plan for the Western Arctic caribou herd in Units 22, 23, and 26A as follows:

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

Establish an Intensive Management (IM) plan for the Western Arctic caribou herd (WAH) for the control of wolves and brown bears.

The WAH has historically been the largest herd in Alaska and has provided subsistence opportunity for up to 40 rural communities and other Alaskans across the state. This herd has a positive IM finding with population and IM objectives of at least 200,000 animals and a harvest objective of 12,000-20,000 animals (5 AAC 92.108). The WAH has been below the IM objective since 2021 (188,000 caribou). The long-term historical harvest for this herd has been estimated at more than 12,000 caribou annually and the estimated harvestable surplus (HS) has been below 12,000 caribou since 2020.

Despite regulatory changes that decreased bag limits and attempted to reduce the harvest of cows across Units 22, 23 and the western portion of 26A that took effect July 1, 2024, the WAH population has continued to decline. The harvestable surplus for the WAH has decreased concurrently with the population decline and is estimated at 5,800 bulls and no cows based on the 2025 census (121,000 caribou). Despite reducing the annual bag limit of cows to one per year in regulatory year 2024, according to permit data little to no reduction in cow harvest has occurred. The average annual harvest of cows from this herd is estimated at 4,000, which is no longer sustainable. Additional proposals submitted to the Board for consideration include the elimination of the cow season. In the short term, the department plans to close the cow season for RY 2027 through emergency order.

Currently, the harvestable surplus is nearing the lower end of the combined amount reasonably necessary for subsistence uses of 8,000-12,000 caribou from the WAH and Teshekpuk (TCH) herds (5AAC 99.025). The harvestable surplus for the TCH is estimated at 3,600, combining that with the harvestable surplus of 5,800 for the WAH, provides a combined surplus of 9,400 caribou. Continued decline from either or both of these herds will likely lead to an inability to provide for the ANS in the near future.

The WAH has been identified as important for providing high levels of harvest for human consumptive use, and as a result, Alaska statutes require the herd to be intensively managed. Considering the rate of

continued decline, the department is proposing an IM plan be codified to benefit the WAH. The department has been working to identify the feasibility of a successful predator removal program and has identified opportunities for the temporary removal of both predator species. Estimates of predation rates on the WAH suggest that predation, primarily from wolves and brown bears accounts for approximately 70% of the caribou mortality in this herd annually.

Wolves: Wolf density estimates are dated in Unit 23; the most recent efforts began in 1977 and concluded in 1991. Efforts to collar packs and subsequently estimate density, pack sizes, and predation on caribou are underway. The department plans to use this information to make informed decisions about the effectiveness of wolf removal on caribou recovery. If an IM plan is adopted and a feasibility assessment indicates wolf removal efforts could benefit the WAH, wolves would be lethally removed during the winter and spring in or near caribou wintering areas, primarily in Unit 23.

Brown Bears: Beginning in 2017 the department implemented a 3-year study of calf mortality which suggested that brown bear predation on the southern portion of the WAH calving grounds (Unit 26A) was a threat to calf survival. Additional mortality data from collared cows shows a relatively high proportion of adult cows being taken by brown bears enroute to the calving area north of the Brooks Range. If an IM plan is adopted and a feasibility assessment indicates brown bear removal efforts could benefit the WAH, brown bears would be lethally removed from the southern extent of the WAH calving grounds.

The department and the board are required to consider all the important, relevant, and material factors relating to the sustainability of a replenishable, public, wildlife resource prior to adoption of a regulatory proposal. The proposed intensive management predator control plan is designed to grow the WAH population to maintain harvestable surplus to offer hunting opportunity by reducing predation from wolves and brown bears. Brown bears and wolves preying on both adult and calf caribou may be removed. The proposed intensive management program for wolves and brown bears is designed to be sustainable for both species in the affected Units. All open seasons for harvest of wolves and brown bears will remain in the vicinity of the removal efforts.

The department is committed to the conscientious application of IM insofar as practicable of principles of management intended to sustain the yield of caribou, wolves and brown bears. The department has considered the role of predators in the ecosystem, as well as their distribution within the range of the WAH. Wolf and brown bear removal in this area under the proposed plan will occur in a small geographic area for a limited duration. Removing wolves and brown bears will have a minor effect on the wolf and brown bear populations. In addition, adequate refugia exists to sustain predator populations in the large swaths of adjacent federally managed lands. The proposed IM program has been carefully developed and is adaptable as new observations and information become available.

If adopted, the department will present an IM feasibility assessment at a future board meeting.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-035)

Proposal 21

5 AAC 92.106. Intensive management of identified big game prey populations.

Establish and implement an Intensive Management plan in Units 22, 23, and the southwestern portion of 26A, for the Western Arctic Caribou Herd (WACH) as follows:

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

5 AAC 92.XXX, Intensive Management Plans

Establish and implement an intensive management plan in Game Management Units 22, 23 and Unit 26A, Colville River drainage upstream from the Nuka River, and drainages of the Chukchi Sea south and west of, and including the Kuk and Kugrua drainages to facilitate the growth of the Western Arctic Caribou Herd (WACH). This program is designed to increase caribou abundance and harvest by reducing predation on caribou by wolves and bears. Thus, it is expected to make a contribution to achieving the intensive management (IM) objectives.

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

Establish and implement an Intensive Management plan in Units 22, 23, and the southwestern portion of 26A, for the Western Arctic Caribou Herd (WACH). The WACH is undergoing an alarming and ongoing decline, with the most recent population estimate at 120,618 animals representing a significant drop from prior years. This trend underscores the urgent need to implement necessary measures across the range of the WACH to ensure the long-term viability of the herd. At the latest WACH Working Group meeting in December 2025, the group classified the herd as "critical, declining," the lowest population tier in their management plan. This designation requires intensive efforts for the herd's survival.

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) requests the Board of Game establish an Intensive Management Plan across the range of the herd to curb caribou mortality as a result of predation by wolves and bears.

Of note, the SPRAC also submitted proposals to reduce the resident caribou harvest limit, and eliminate cow harvest in Units 22, 23, and the southwestern portion of Unit 26A, and close the nonresident hunt in Unit 22 as additional conservation measures for the WACH.

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

The Seward Peninsula Subsistence Regional Advisory Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Game Management Unit 22. The Council provides a public forum for the expression of opinions and recommendations regarding matters related to the subsistence uses of fish and wildlife within the region, and we speak on behalf of 19 communities within the region. The proposal was developed during the March 2026 Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-051)

Proposal 22

5 AAC 92.106. Intensive management of identified big game prey populations.

Establish an intensive management plan within the range of the Western Arctic Caribou Herd (WACH) as follows:

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

The Council is aware that ADF&G has begun conducting a feasibility study to assess the potential for implementing an IM plan to support the recovery of the WACH. While the Council is not certain of the anticipated timeline for completion of this study, it respectfully requests that ADF&G continue this work as needed. Additionally, the Council asks that an IM Plan be established at your January 2027 meeting, with the intent that implementation may begin as soon as it is determined to be feasible.

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

Establish an intensive management plan within the range of the Western Arctic Caribou Herd (WACH). The WACH's population has been in decline for many years, and the herd is no longer an adequate subsistence resource for those that reside within their home range.

The population has been below 200,000 animals for five years, which is the trigger for Intensive Management (IM) set in statute. The Council was informed at our March 2026 meeting in Kotzebue that the Alaska Department of Fish & Game (ADF&G) was planning on conducting a study this spring in Unit 23 to evaluate the feasibility of instituting an IM program. The Council represents a region that is heavily dependent on the WACH and would like to see the next steps be taken to create an IM plan within the range of the WACH.

The Council recognizes that both wolf and bear seasons and harvest limits in Unit 23 are liberal under both Federal and State regulations, but we believe that additional help at removing predators would be highly beneficial to the recovery of the WACH.

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

No. The Council did hear information presented by the ADF&G on the health and population of the WACH and heard that other entities may be putting in a similar proposal.

PROPOSED BY: Northwest Arctic Subsistence Regional Advisory Council (OI-F26-133)

Proposal 23

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Create an Intensive Management Plan to benefit the Western Arctic Caribou Herd as follows:

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

We propose that the BOG direct the ADF&G to implement an Intensive Management Plan to remove wolves and brown bears throughout the range of the WAH at a level high enough to expedite the recovery of this

herd to its management objective of 200,000 or greater and to maintain predator removal for a minimum of five years once it meets or exceeds that objective.

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

The WAH caribou population is well below the management objective of 200,000 and enumerates 121,000 as of the summer of 2025. It has been declining for over 20 years. Bag limits have been reduced from 5 caribou per day with no closed season to 15 caribou per hunter per year of which only one cow could be harvested, and new proposals have been submitted to further reduce resident and non-resident bag limits and to allow only bull harvest. Hunters throughout the WAH range have reported an increase of wolf and brown bear populations and we believe that the BOG should authorize the ADF&G to implement a control program to remove wolves and brown bears throughout the WAH range (Units 22, 23 and 26ASW that is the Colville River drainage upstream from and including the Nuka River, and drainages of the Chukchi Sea south and west of, and including the Kuk and Kugrua drainages) to a level high enough to expedite the recovery of this herd to the management objective of 200,000 or greater for a minimum of five years once it meets or exceeds that objective.

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

This was developed by the North Slope Advisory Committee

PROPOSED BY: North Slope Fish & Game Advisory Committee (OI-F26-022)

Proposal 24

5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A as follows:

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

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units... 26;

...

(8) Unit 22;

(9) Unit 23;

...

(13) Unit 18;

...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- ...
- (4) Unit 18;
- ...
- (7) Unit 22;
- (8) Unit 23;
- ...
- (10) Unit 26(A).

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

The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically reinstates. The department recommends continuing resident tag fee exemptions for the general season and subsistence season hunts in Region 5 (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 10 years; Unit 22, where the tag fee has been exempted for 20 years; Unit 23, where the tag fee has been exempted for 15 years; and Unit 26A, where the tag fee has been exempted for 10 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for regulatory year (RY) 2012 and average harvests have remained within sustained yield limits and continue to be similar to the preceding 10-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age, or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements currently include the exemption. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADF&G for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, an estimated 0–3 bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging less than 1 bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest is less than 5 bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between 0 and 5 bears are taken annually by subsistence hunters. Only 6 subsistence permits were issued in Region 5 and 0 bears were taken RY2023.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-022)

Kotzebue Area - Unit 23

Proposal 25

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Restrict nonresident caribou hunting in GMU 23 as follows:

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

DC923 would stay 0 permits for Nonresidents. Nonresident caribou - no open season.

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

Allowing non-residents to hunt caribou in GMU23 under DC923 up to 50 permits. The western Arctic caribou herd has continued to decline to a critical preservative status and residents of GMU 23 have reduced their caribou harvest allotment by 99% in the last few years. We have now proposed a 4 bull and no cow harvest. Having non-residents still able to fly in to GMU23 to hunt caribou for sport, is no longer tenable to the Kotzebue Sound Advisory Committee and residents of the GMU.

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

The Kotzebue Sound Advisory Committee originated and supported this proposal unanimously.

PROPOSED BY: Kotzebue Sound Fish & Game Advisory Committee (OI-F26-034)

Proposal 26

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Allow the use of artificial lights and bait to hunt grizzly/brown bears in GMU 23 as follows:

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

The ability to use artificial lights and bait to hunt grizzly/brown bears in GMU23.

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

Brown/grizzly bears are increasingly coming into towns like Kotzebue and camps in GMU23 during the night and causing safety issues. Would like a way to shoot them at night without using DLP, so the hides do not need to be surrendered. This would encourage people to put down problem bears and address public safety. These bears lay up during the day and only come out at night.

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

The Kotzebue Sound Advisory Committee originated and supported this proposal unanimously.

PROPOSED BY: Kotzebue Sound Fish & Game Advisory Committee (OI-F26-035)

Nome Area - Unit 22

Proposal 27

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the resident season for caribou in GMUs 22B and 22D as follows:

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

Open Season	Resident	
	(Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		
(17)		
...		

Unit 22(B), that portion west of Golovnin Bay, and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage

RESIDENT HUNTERS:

15 caribou total, by registration permit only, only one of which may be a cow; during the period Oct. 1 – Apr. 30, a season may be announced by emergency order, cow caribou may not be taken Apr. 1 – Apr. 30

up to 5 caribou per day during the period May 1 – Sept 30, a season may be announced by emergency order; cow caribou may not be taken Apr. 1 – Aug 31

May be announced
[OCT. 1 – APR. 30]

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 bull; during the period Aug 1 -
Sept 30, a season may be announced
by emergency order;

(Season to be
announced by
emergency order)

Unit 22(D), that portion in the
Pilgrim River drainage

RESIDENT HUNTERS:

15 caribou total, by
registration permit only,
only one of which may be
a cow; **during the period Oct. 1 –
Apr. 30, a season may be
announced by emergency order,**
cow caribou may not
be taken Apr. 1 – Apr. 30

May be announced
[OCT. 1 – APR. 30]

up to 5 caribou per day;
during the period
May 1 – Sept 30, a season may
be announced by emergency
order; cow caribou may not be
taken Apr. 1 – Aug. 31

(Season to be announced
by emergency order)

NONRESIDENT HUNTERS:

1 bull; during the period Aug. 1 -
Sept. 30, a season may be announced
by emergency order;

(Season to be
announced by
emergency order)

...

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

The Board of Game established the resident RC800 caribou hunting permit in Regulatory Year (RY) 2016 to allow for caribou hunting in Unit 22 while also preventing hunting in areas where active reindeer herding operations occur. These areas are noted in the regulations as “May Be Announced” seasons for residents under the RC800 permit and nonresidents hunting under the general season harvest ticket (HT) to allow the department to open these areas to caribou hunting by emergency order if caribou are observed in active reindeer ranges to minimize conflicts with Seward Peninsula reindeer herding. In RY2024 and RY2025, the department issued emergency orders to modify the season for caribou in those portions of 22D in the Pilgrim River drainage and 22B West of the Golovnin Bay areas in response to active reindeer herding efforts in the area.

Caribou from the Western Arctic Caribou Herd (WAH) have not been documented in these two portions of Unit 22 since 2015. If caribou are later confirmed to be in the area, the department has the ability to open the hunting season for residents and nonresidents at that time.

Because caribou are not present in the western portions of Units 22B and 22D identified in this proposal, hunting is being restricted to prevent the harvest of reindeer that may be mistakenly identified as caribou. If caribou were to enter areas of active reindeer herding, hunting seasons will be opened by the department to provide caribou harvest opportunity. Reindeer are categorized as domestic and can be privately owned in Alaska. As such, reindeer are not managed as game animals for harvest.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-031)

Proposal 28

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close the nonresident caribou hunt in Unit 22 as follows:

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

5 AAC 85.025, Hunting seasons and bag limits for caribou. Close the nonresident caribou hunting season in Unit 22 as follows:

Unit 22A, North of the Golsovia River drainage

NONRESIDENTS ONLY: No Open Season [ONE BULL; AUG 1 -SEPT30]

Unit 22A, Remainder

NONRESIDENTS ONLY: No Open Season [ONE BULL; MAY BE ANNOUNCED]

Unit 22B, West of Golovnin Bay, west of the west banks of Fish and Niukluk rivers below the Libby River (excluding the Libby River drainage and the Niukluk River drainage above, the mouth of the Libby River)

NONRESIDENTS ONLY: No Open Season [ONE BULL; MAY BE ANNOUNCED]

Unit 22B, Remainder

NONRESIDENTS ONLY: No Open Season [ONE BULL; AUG 1 -SEPT30]

Unit 22C

NONRESIDENTS ONLY: No Open Season [ONE BULL; MAY BE ANNOUNCED]

Unit 22D, Pilgrim River drainage

NONRESIDENTS ONLY: No Open Season [ONE BULL; MAY BE ANNOUNCED]

Unit 22D, in the Kuzitrin River drainage (excluding the Pilgrim River drainage) and the Agiapuk River drainage

NONRESIDENTS ONLY: No Open Season [ONE BULL; AUG 1 -SEPT30]

Unit 22D, Remainder

NONRESIDENTS ONLY: No Open Season [ONE BULL; MAY BE ANNOUNCED]

Unit 22E, East of and including the Sanaguich River drainage

NONRESIDENTS ONLY: No Open Season [ONE BULL; AUG 1 -SEPT30]

Unit 22E, Remainder

NONRESIDENTS ONLY: No Open Season [ONE BULL; MAY BE ANNOUNCED]

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

The Western Arctic Caribou Herd (WACH) is undergoing an alarming and continuous decline, with the most recent population estimate at 120,618 animals representing a significant drop from prior years and resulting in the WACH Working Group placing the herd in the “Critical Management” level. This decline has triggered the need to reduce caribou bag limits for Alaska residents across the range of the WACH to reduce the overall harvest pressure and contribute to the long-term viability of the herd. The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) has also submitted a proposal requesting a reduction to the resident bag limit of caribou for Unit 22 and further recognizes that the low abundance of caribou observed on the Seward Peninsula also warrants closing caribou harvests by nonresident hunters in Unit 22.

The SPRAC requests to close the nonresident caribou hunt in Unit 22 to further reduce the hunting pressure on the herd while maximizing hunting opportunities for resident hunters. While the harvest of caribou by nonresident hunters may be considered a very small part of the total caribou harvest by some, every animal counts. Furthermore, this proposal is aligned with the recommendations established by the WACH Working Group under the “Critical Management” level of the herd as outlined in the Western Arctic Caribou Herd Cooperative Management Plan of 2019 to restrict the harvest of the herd to residents only.

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

The Seward Peninsula Subsistence Regional Advisory Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Game Management Unit 22. The Council provides a public forum for the expression of opinions and recommendations regarding matters related to the subsistence uses of fish and wildlife within the region, and we speak on behalf of 19 communities within the region.

The proposal was developed at a Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-048)

Proposal 29

5 AAC 85.025. Hunting seasons and bag limits for caribou.

From Sanaguich river drainage to York mountains to be closed state and federal as follows:

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

From Sanaguich river drainage to York mountains to be closed state and federal ; there are no caribou.

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

My reindeer herd; the Ongtawasruk Reindeer herd in the wales area; has encountered too many poachers out of brevig, shishmaref and tin city I need these hunting regulations to start being enforced and the area patrolled. There is a lot of over harvest in the area. I do not want my herd to be effected by their overharvest.

One of the agencies I reported unauthorized harvest of reindeer to had replied with the following statement :“ Interfering with or harming your reindeer can trigger animal cruelty and criminal mischief statutes — animals (including livestock) are protected from intentional injury (AS 11.61.140), and damaging/tampering

with property (your animals/equipment) can be criminal mischief (e.g., AS 11.46.486/482 depending on damage amount). Issue a written Trespass Notice (if the harasser is known):

Reference AS 11.46.350 and state they're not permitted to enter or interfere with your herd or equipment"

This is an Ongoing issue I deal with and I would like more enforcement on the hunting violations.

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

PROPOSED BY: Lisa Ongtawasruk (HQ-F26-004)

Proposal 30

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the hunt areas for caribou in Unit 22B and 22D as follows:

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

The new "May Be Announced" hunt areas for resident and nonresident caribou hunt areas in Unit 22B and 22D would be:

Unit 22(B), that portion west of Golovin Bay, and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage [22B, that portion west of the Kwiktalik Mountains and including all drainages flowing into Kachavik River, west of the Etchepuk River including Cache Creek, west of the Pargon River, and including the Niukluk River below the mouth of the Libby River]

- (May be announced)

Unit 22(D), that portion in the Kuzitrin River drainage (excluding the Pilgrim River drainage) [and east of the American River and including that portion of the American River and all drainages flowing into the American River above and including Budd Creek]

- (May be announced)

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

This proposal will improve regulatory and legal confusion around caribou open seasons and reindeer herd ("May Be Announced") boundaries in Unit 22 by aligning reindeer grazing permit regions with existing "May Be Announced" regions to reduce instances of reindeer theft in areas with open caribou seasons without reducing caribou hunting opportunities. Many existing reindeer thefts come from areas within reindeer grazing permits where there are no caribou, but hunters are mistakenly led to shoot private reindeer under the auspices of a caribou registration hunt.

RHA developed this proposal in consultation with Unit 22 ADFG biologists to ensure that there are no caribou in the small regions that would be reclassified into the boundaries of existing MBA seasons, ensuring that caribou hunters benefit from reduced confusion that brings the potential for theft or poaching charges, and still retain full access to existing caribou hunts in Unit 22 as before. The clarity of this realignment of boundaries will support both caribou hunters and reindeer herders.

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

Yes, the RHA Program Director worked with ADF&G Unit 22 Management Staff to develop this proposal. Discussions between ADF&G and RHA occurred at the 2025 Annual Meeting in Nome with the reindeer herders from across the Seward Peninsula, where this proposal was supported. Of note in support of clarifying boundaries for the benefit of subsistence caribou users and reindeer herders alike were reindeer herders from Brevig Mission, Wales, White Mountain, Nome and Teller.

PROPOSED BY: Kawerak Reindeer Herders Association (OI-F26-002)

Proposal 31

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Align the caribou hunting seasons in Unit 22 by extending the “May Be Announced” bag limit in Unit 22 as follows:

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

The new bag limit for RC800 “May Be Announced” seasons would reflect the current open season for caribou under RC800.

15 caribou total, by registration permit only, only one of which may be a cow; cow caribou may not be taken April 1 – June 30.

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

In consultation with Unit 22 ADFG biologists, the Reindeer Herders Association offers this administrative improvement to existing “May Be Announced” (MBA) season bag limits (22E Remainder, 22D Remainder, 22C, 22D, 22B West, and 22A Remainder). While the MBA regions currently exist to reflect the absence of caribou, the ongoing presence of privately-owned reindeer herds, and the prevention of reindeer theft, aligning the caribou open seasons in Unit 22 with the MBA seasons will improve ease of regulatory understanding for caribou hunters. It will also improve collaboration between ADFG, caribou hunters and reindeer herders, as prospective emergency orders requested by reindeer herders to open MBA seasons were caribou to enter the MBA regions will be most effective when unified with other caribou seasons.

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

Yes, the RHA Program Director worked with ADF&G Unit 22 Management Staff to develop this proposal. Discussions between ADF&G and RHA occurred at the 2025 Annual Meeting in Nome with the herders from across the Seward Peninsula, where this proposal was supported by members.

PROPOSED BY: Kawerak Reindeer Herders Association (OI-F26-003)

Proposal 32

5 AAC 99.025(a)(8). Customary and traditional uses of game populations.

Revise the GMU 22 moose ANS to 350–450 moose annually up from the current ANS of 250–300 as follows:

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

Revise the GMU 22 moose ANS to 350–450 moose annually. My proposed ANS would exceed the current ANS of 250–300 but is still below the potential number of moose hunters that participate each year. Based upon a review of moose permits I think it is possible that multiple persons in a household are applying for permits and I have attempted to come up with an ANS that reflects household level data. An ANS of 350–450 largely reflects RM840 demand but still leaves enough management flexibility to continue the general permit hunts in 22A, 22B East and 22E. The derby style hunt outcomes we have been experiencing in 22B, 22C, & 22D are a result of high demand. According to ADFG data it appears that approximately 590+ hunters participate in moose hunts across 22 A, B, C, D, & E. Those numbers reinforce the need for a revised ANS, those numbers do NOT undercut a higher ANS. The derby style hunts impact reasonable opportunity. I believe the BOG has an obligation to identify need. I do not believe the BOG should be bound by moose harvests we have achieved under the derby style hunts we have been experiencing. ANS does NOT equate to a quota it should equate to the many sociological factors that make up our customary and traditional use. I am not saying 350–450 moose can be harvested I am proposing that 350–450 is reasonably necessary for subsistence uses. Looking ahead, regional development including the Port of Nome expansion and the proposed Graphite One project has the potential to increase human population, access, and demand for subsistence resources over the coming decades. Without a corrected ANS there will not be proactive management, but rather prolonged avoidance of a problem that requires a solution. The rapid 1–2 day RM840 closures is NOT “reasonable opportunity”. AS 16.05.258(b) requires reasonable opportunity for subsistence. Under the current ANS, harvest fails to meet need. Even if ANS were corrected the GMU 22 moose hunt may still be insufficient but I believe doing so may have the effect of increasing reasonable opportunity. The Board faces a clear choice: address the moose hunt in GMU 22 now through a deliberate revision of the ANS, or continue to defer the issue. Failure to modernize the ANS delays the statutory mechanisms designed to meet the needs of subsistence users. The current management framework already demonstrates that reasonable opportunity for subsistence users is not being provided. The number of RM840 permits provides a direct indicator of subsistence demand for moose in GMU 22. Demand for moose has remained consistently high even during years with rapid emergency closures and shortened seasons. This indicates a strong reliance on moose. The current GMU 22 moose ANS is outdated and does not reflect subsistence demand, household participation, or community reliance on moose. Emergency closures lasting one to two days do not provide reasonable opportunity as required by AS 16.05.258(b).

Failure to revise the ANS perpetuates a management framework in which subsistence need is systematically underrepresented, and conflicts are deferred rather than addressed. Revising the ANS is a necessary step to meaningful subsistence management in GMU 22 and should occur independently of current biological constraints or short term harvest outcomes.

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

Revise ANS upward based on permits issued and demonstrated demand. The core principle I am arguing is the ANS must reflect demonstrated subsistence demand. When harvest is capped by quota and season length, hunter success is not a valid method to determine subsistence need. RM840 permits + rapid closures has resulted in suppressed harvest. Suppressed harvest doesn't equal reduced need. The GMU 22 ANS is

outdated and artificially low. Current moose harvest is constrained by EO driven closures and does not reflect number of permits issued or community reliance on moose. This proposal for ANS uses subsistence demand rather than actual harvest, consistent with AS 16.05.258 and 5 AAC 99.010. Moose harvest is constrained by quota, short seasons, and emergency closures, harvest outcomes should not be used as a proxy for subsistence need. With this proposal I request that the AK Division of Subsistence take a deep dive into ANS and engage the communities to better understand the issues

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

This proposal was developed through review of publicly available Alaska Department of Fish and Game data, Board of Game and Federal Subsistence Board actions, and subsistence harvest information for GMU 22. The proposal also reflects concerns that have been raised consistently by my fellow subsistence users across Unit 22 regarding limited access, short duration seasons, and repeated emergency closures.

This proposal was not formally adopted or sponsored by a local fish and game advisory committee prior to submission however for decades I have been advocating for revision of the ANS at the advisory committee level and via past BOG proposals. The intent of this proposal is to advance the long standing concerns to the Board for formal consideration using the best available data under the subsistence priority for a modernized ANS for moose in GMU 22.

PROPOSED BY: Austin Ahmasuk (OI-F26-147)

Proposal 33

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

Limit moose hunting permits to one permit per household in Units 22B Remainder, 22C, and 22D; and Require hunters to select a designed hunt area at the time of permit issuance as follows:

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

Amend regulations to:

- Limit moose hunting permits to one permit per household in Units 22B Remainder, 22C, and 22D; and
- Require hunters to select a specific subunit or designed hunt area at the time of permit issuance, restricting them to that area for the duration of the hunt.

This change would distribute hunting pressure more evenly, reduce overcrowding in key areas, and improve hunting success for local subsistence users.

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

Current moose hunting regulations in Units 22B Remainder, 22C, and 22D do not adequately limit the number of permits per household or require hunters to select specific hunting areas. This has resulted in increased hunting pressure from non-local hunters, particularly in accessible and high success areas.

The lack of permit limits allows multiple members of a single household to obtain permits, intensifying harvest pressure. Additionally, hunters are not restricted to specific subunits, allowing concentrated use of

prime hunting areas. This reduces hunting success for local subsistence users who rely on these areas to meet their food needs.

If left unchanged, this imbalance will continue to disadvantage local hunters and reduce the effectiveness of subsistence hunting across these units.

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

Yes. This proposal was developed through discussions with local hunters, community members, and leadership within the City of White Mountain. Observations from recent hunting season and ongoing community concerns informed the need to expand this approach beyond Unit 22B Remainder to include Units 22C and 22D.

PROPOSED BY: City of White Mountain (OI-F26-100)

Proposal 34

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

Extend the RM843 winter antlered bull moose season to January 1 – February 28 as follows:

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

Extend the RM843 winter antlered bull moose season to:

January 1 – February 28

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

The current RM843 winter antlered bull moose season does not extend long enough to allow hunters a reasonable opportunity to harvest the available quota. In both 2024 and 2025, harvest remained below quota, requiring Emergency Orders to extend the season.

This demonstrates that the current season length is insufficient and not aligned with actual hunting conditions. Continued reliance on Emergency Orders creates uncertainty and inefficiency. A regulatory adjustment would provide consistency and better reflect real-world harvest patterns.

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

Yes. This proposal was developed based on input from local hunters, community observations, and ongoing communication within the City of White Mountain.

PROPOSED BY: City of White Mountain (OI-F26-102)

Proposal 35

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

Change dates of DM845 from Nov 1st- Dec 31st to Aug 25-Sep14 as follows:

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

Changing the season to August 25th - Sept 14th for safer operations. The resident moose season opens August 1st, running through Dec 31st, allowing locals sufficient time to hunt before and after. It also is not during the high point of the moose rut. These NR drawing tags are already allotted for potential harvest. The population in the area is on the increase.

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

Currently the DM845 hunt is Nov 1st- Dec 31st. This is during the start of winter with 7 hours of daylight and cold temperatures. This is not an ideal time to hunt for people outside of Alaska. I see this as a safety concern trying to conduct VFR flights for hunters in & out of the field. Yes, this hunt has been conducted during this time. But being on a set allocated quota of tags I see no reason this hunt couldn't be conducted sooner.

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

It was not. I am from out of the local area and was unable to attend those meetings on Zoom due to a schedule conflict.

PROPOSED BY: Justin Horton (OI-F26-185)

Proposal 36

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

Change moose hunting season dates to Sep 6- Sep 20 as follows:

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

Change the season start date to:

September 6 – September 20

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

The Current moose hunting season begins on September 1, which coincides with poor hunting conditions in the White Mountain area. Warm temperatures, high water, and dense vegetation reduce access visibility.

Local subsistence hunters experience low success rates during the first day of the season while incurring significant fuel costs. This creates inefficiency and reduces the ability to meet subsistence needs.

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

Yes. This proposal reflects input from local subsistence hunters, city leadership, and community discussions within White Mountain.

PROPOSED BY: City of White Mountain (OI-F26-101)

Proposal 37

5 AAC 85.045(20). Hunting seasons and bag limits for moose.

Establish a resident registration permit hunt for moose in 22E as follows:

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

Open Season	Resident	
	(Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		
(20)		
...		
Unit 22(E)		
RESIDENT HUNTERS:		
1 bull <u>by registration permit only</u> ; or	Aug. 1 – Dec. 31	
1 antlered bull <u>by registration permit only</u>	Jan. 1 – Mar. 15	
NONRESIDENT HUNTERS:		
1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 25 permits may be issued		Sept. 1 – Sept. 14
...		

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

Moose abundance in Unit 22E has historically persisted at low densities. Fall composition surveys completed in the area during 2014-2022 indicate that the high bull:cow ratio has been slowly declining and as of the latest survey, completed in 2022, is now at the management objective of 30 bulls:100 cows. Though the bull:cow ratio is at management objectives, declines in the bull:cow ratio warrant a better understanding of hunter harvest patterns in the area.

The Unit 22E hunt area is remote and not immediately accessible along the Nome Road system. Such challenges have historically limited hunter participation and harvest in the area; however, participation from residents who do not reside in Unit 22E has increased over the last 5 years, likely due to the Unit 22D Remainder hunt area restrictions incorporated in regulatory year (RY) 2020. The number of resident hunters participating in the Unit 22E moose hunt has increased from an average of 24 permits issued annually RY10-RY19 to 39 permits annually RY20-RY25. As a result of this increased participation by residents, the number of nonresident DM855 permit numbers have been reduced annually since the hunt was established in RY23.

A lack of data on resident harvest complicates management of the Unit 22E moose population. More accurate reporting would provide the department with data necessary for management of the Unit 22E moose hunt. Elsewhere in Unit 22, the department has implemented registration permit hunts with harvest quotas (e.g., RM840) in hunt areas immediately accessible along the Nome Road System in order to maintain harvest at sustainable levels. Unit 22D Remainder was added as a hunt area of RM840 in RY2020. These registration permit hunts have reporting requirements of up to 48 hours upon a successful harvest and have been instrumental in better understanding hunter harvest in the area.

The proposed regulatory changes would improve harvest reporting in the area as well as provide the department with the tools necessary to maintain harvest at sustainable levels. The department is not proposing changes to season dates or bag limits and does not plan to incorporate a quota with this permit at this time.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-034)

Proposal 38

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

Lengthen the season of DM855 from Sept 1-14 to Aug 25-Sep14 as follows:

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

Opening the season on August 25th to spread out the NR tags to a 3-week hunting window. Resident season opens August 1st and will not conflict in this remote part of 22E. It also does not target rutting bulls by starting sooner rather than extending the season until September 21st.

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

Lengthen the season of DM855 (currently Sept 1-14). Hunting pressure is condensed to a 14-day window amongst competing guides. This decreases the value and the experience of the hunt by seeing other hunters. Since the tags are already awarded, it is no longer a question of over-harvest but in reducing competitive hunting practices by spreading the season out more.

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

It was not. I am from out of the local area and was unable to attend those meetings on Zoom due to a schedule conflict.

PROPOSED BY: Justin Horton (OI-F26-184)

Proposal 39

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

Amend hunting season in 22E for "one antlered bull" from Aug1-Mar 15 to Aug1-Dec31 as follows:

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

Close the "one antlered bull" season in 22E. Jan 1-March 15.

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

The current moose season for residents in 22E is one of the longest in the state, August 1st- March 15th. Moose being hunted with snow machines during the winter months is concerning. In the past 10 years, snow machine, navigation, and communication technology has greatly improved; ownership is more abundant in the region.

This has led to increased hunting pressure in 22E from surrounding villages.

Another contributing factor is the RM840 closing sooner & sooner annually. Hunters outside of 22E are now going into 22E, contributing to the increase in the potential harassment of moose in the winter. The prolonged hunt puts undue pressure on all 22E moose, not just the bulls. The odds of seeing an "antlered bull" during Jan 1-March 15 is low and not worth conducting this hunt.

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

It was not. I live outside of the local area and was unable to attend those meetings on Zoom due to a schedule conflict.

PROPOSED BY: Justin Horton

(OI-F26-187)

Proposal 40

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Change hunting dates for Musk Ox hunt in GMU 22 to Aug1-Mar 31 as follows:

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

Preferred solution is TX090 season date Aug1-Mar 31 [Mar 15].

Alternate solution is TX090 season with end date later than Mar 15 such as March 24.

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

The TX090 hunt is a relatively new hunt, having been open for five years. We are still learning how to carry out this hunt. During the first two years, the majority of the harvest occurred in August and September. However, in the third and fourth years, the timing of harvest shifted to the winter months, with only one animal being harvested in August or September in each of those years. This year, all hunters chose to wait

until winter to harvest, when both meat and qiviut are at their best. Only two out of 10 hunters were successful.

There has been a noticeable shift in the distribution of animals away from the area near Unalakleet. Over the first five years of the hunt, all but one animal was harvested in this area. Recently, however, hunters have needed to access more remote locations due to muskox migration and displacement where travel by four-wheelers or boats is very limited. These areas are typically only accessible after sufficient snowfall, but not during the years with excessive snow accumulation, such as 2026.

Currently, March 15 is the standard closure date for Muskox hunts in GMU 22. However, several hunts in GMU 18 and 26 remain open till March 31. Given increasing reliance on winter access and the variability of snow conditions, aligning the TX090 season with these later closing dates may improve hunter opportunity and success.

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

SNSAC has discussed this proposal with several current and previous TX090 permit holders.

PROPOSED BY: Wes Jones (OI-F26-062)

Proposal 41

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Extend the musk oxen hunting season in Units 22B, D, E, and 23 as follows:

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

5 AAC 85.050, Hunting Seasons and bag limits for musk oxen

Unit 22B east of the Darby Mtns., including drainages of Kwiniuk, Tubutulik, Koyuk and Inglutalik rivers

RESIDENTS ONLY: One bull by permit, TX 105, August 1 – Mar **30** [15]

22B remainder

RESIDENTS ONLY: One bull by permit, TX 105, Jan 1 – Mar **30** [15]

22D that portion west of the Tusuk River drainage, west of the west bank of the unnamed creek originating at the unit boundary opposite the headwaters of McAdam’s Creek and west bank of Canyon Creek to its confluence with Tusuk Channel

RESIDENTS ONLY: One bull by permit, TX 103, Jan 1 – Mar **30** [15]

22D Kuzitrin River drainage (includes Kougarok and Pilgrim rivers)

RESIDENTS ONLY: One bull by permit, TX 102, Jan 1 – Mar **30** [15]

22D remainder

RESIDENTS ONLY: One bull by permit, TX 102, August 1 – Mar **30** [15]

22E

RESIDENTS ONLY: One bull by permit, TX 104, August 1 – Mar **30** [15]

23 Seward Peninsula west of and including the Buckland River drainage

RESIDENTS ONLY: One bull by permit, TX 106, August 1 – Mar **30** [15]

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

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) requests the Board of Game to extend the musk oxen hunting season in Units 22B, D, E and 23, the portion of Seward Peninsula west of and including the Buckland River drainage, to March 30th. The SPRAC believes that changing weather patterns have recently made it more difficult for hunters to access muskoxen herds. This extension will provide resident hunters with more opportunities to harvest muskox if there is a delay in access due to weather. As this is a closely managed Tier II hunt, there are no conservation concerns for this proposed season extension, and it would not interfere with calving. Furthermore, this proposal intends to align State and Federal regulations within those units.

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

The Seward Peninsula Subsistence Regional Advisory Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Game Management Unit 22. The Council provides a public forum for the expression of opinions and recommendations regarding matters related to the subsistence uses of fish and wildlife within the region, and we speak on behalf of 19 communities within the region.

The proposal was developed at a Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-046)

Proposal 42

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Extend the muskox hunting season to end on March 31 as follows:

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

Extend the muskox hunting season to:

Current opening date – March 31

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

The current muskox hunting season ends on March 15, which does not allow sufficient time to harvest available quota under typical winter conditions.

Late season conditions, when travel is often safest and most reliable, occur after the season closes. This limits hunting opportunity and results in underutilization of available harvest.

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

Yes. This proposal was developed based on input from local hunters and is intended to support and reinforce a similar proposal anticipated from the Seward Peninsula Regional Advisory Council.

PROPOSED BY: City of White Mountain (OI-F26-099)

Proposal 43

5 AAC 92.062. Priority for subsistence hunting; Tier II permits.

Make the GMU 22 Musk ox Tier II permit a household permit as follows:

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

5 AAC 92.062 Priority for subsistence hunting; Tier II permits.

(c) In the Tier II hunts in Unit 22, any person in the household of the successful applicant may harvest the muskox, and all members of the household must be listed on the application.

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

The Tier II muskox permits provide subsistence opportunities for Unit 22 residents, but that opportunity is limited to only a few individuals. I would like to see the Tier II muskox permits become household permits, where all members of the household are listed on the permit and any one of those members may legally fill the permit - similar to the household subsistence fishing and crabbing permits in the area. The hunter would be required to have a hunting license (unless under 18) and the household's permit with them at the time of hunt. The change would allow experienced hunters to pass their knowledge to other members of their household and would allow flexibility for other household members to fill the tag if a life event occurs during the permit period (e.g., child birth, cancer treatments, etc.).

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

I have discussed this idea with several other Tier II permit holders in Nome, all of whom see a different way this change would be beneficial. Some households would like their children to be able to shoot a muskox, while others have had life events occur during the hunting season that made it extremely difficult to fill the permit - but those events weren't major enough to qualify for proxy hunting.

PROPOSED BY: Mariah Morgan (OI-F26-040)

Proposal 44

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Add unit 22A to the acceptable places in which hunters can establish a black bear baiting site as follows:

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

Add unit 22A to the acceptable places in which hunters can establish a black bear baiting site

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

I would like to introduce a proposal for the allowing of black bear baiting in unit 22A.

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

I have talked with several other hunters in the region and we all feel that the bear population is strong enough to support hunting over bait.

PROPOSED BY: Unalakleet

(OI-F26-098)

Proposal 45

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Permit for hunting bear with the use of bait or scent lures within Unit 22 as follows:

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

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures within Unit 22.

(a) A person may not establish a bear bait station to hunt bear with the use of bait or scent lures without first obtaining a permit from the department under this section.

(b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:

(1) a person may only establish a black bear bait station, or a black and brown bear bait station in Units 7, 11, 12, 13, 14(A), 14(B), that portion of the remainder of 14(C), excluding Glacier Creek drainage outside of Chugach State Park, 15, 16, 18, 19, 20, 21, 22, 23, 24(B), 24(C), 24(D), 25(C), and 25(D) if that person obtains a permit under this section;

(2) a person must complete a bear hunter clinic given by the department before that person may obtain a permit from the department under this section;

(3) a person must be at least 18 years of age to be issued a permit;

(4) a person may not have more than two bait stations established with bait present at any one time, except that in Units 6, 7, 9, 11, 12, 13, 14(A), 14(B), 15, 16, 17, 19, 20, 21, 22, 24, and 25, a registered guide-outfitter may operate up to 10 bait station sites at a time in each guide use area that the registered guide-outfitter may conduct big game hunting services in under AS 08.45.750, and may either personally or through licensed class-A assistant or assistant guides establish and maintain those sites simultaneously, if a signed big game commercial services contract under 12 AAC 75.260 is used for each hunter that uses any of the sites;

(5) a person may not use bait or scent lures within

(A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;

(B) one mile of a

(i) house or other permanent dwelling, except that bait may be used within one mile of a cabin if the cabin is on the opposite side of a major river system, as identified by the department in the permit, from the bear baiting station;

(ii) business; or

(iii) school; or

(C) one mile of a developed campground or developed recreational facility;

(D) five miles of a community in Unit 22

(6) a person may not give or receive remuneration for the use of a bait station, including barter or exchange of goods; however, this paragraph does not apply to remuneration from a client to a registered guide-outfitter, master guide-outfitter, or employee of the contracting guide for providing big game hunting services;

(7) a person using bait or scent lures shall clearly identify the site with a sign reading "bear bait station" that also displays the person's hunting license number, and the permit number;

(8) only biodegradable materials may be used as bait; if fish or big game is used as bait, only the head, bones, viscera, or skin of legally harvested fish and game may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait;

(9) repealed 4/8/2012;

(10) a permittee must remove bait, litter, and equipment from the bait station site when hunting is completed;

(11) repealed 4/8/2012;

(12) repealed 7/1/2016;

(13) in Units 7, 9, 11, 12, 13, 14(A), 14(B), 15, 16, 17, 18, 19, 20, 21, 23, **22**, 24, 25, 26(B), and 26(C), a hunter who has been airborne may take or assist in taking a black bear at a bait station with the use of bait or scent lures if the hunter possesses a permit issued by the department if the hunter is at least 300 feet from the airplane at the time of taking; in Units 7, 11, 12, 13, 14(A), 14(B), 15, 16, 18, 19, 20(A), 20(B), 20(C), that portion of 20(D) north of the Tanana River, 20(E), 20(F), 21, **22**, 23, 24(B), 24(C), 24(D), and 25(D), a hunter who has been airborne may take or assist in taking a brown bear at a bait station with the use of bait or scent lures if the hunter possesses a permit issued by the department if the hunter is at least 300 feet from the airplane at the time of taking;

(14) before a person establishes a bear baiting station and places bait at the baiting station that person shall, at the time of registration, provide to the department the specific location of the baiting station on a form provided by the department;

(15) the department may accept registration up to 15 days prior to opening the baiting season in Unit 18.

(c) Except as otherwise limited in this section, a person may bait and hunt another persons's bait station site if the person has written permission from the person who registered the site.

(d) In this section, "operate" means to establish, register, bait, maintain, or hunt a bait station site.

(e) In this section, "equipment" means barrels, tree stands, game camera, and other items associated with a bear bait station. Tree stands may be left in the field year-round with permission of the landowner or such other person authorized to give permission.

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

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) requests the Board of Game allow bear baiting in Unit 22, as a means to harvest brown and black bears. The SPRAC did not specify exact dates that bear baiting would be allowed.

The SPRAC believes that the alarming decline of the Western Arctic Caribou Herd (WACH) justifies the need to increase the hunting success of bears within the region and requests the inclusion of Unit 22 to the list of exceptions in 5 AAC 92.044, with the added provision that bear baiting cannot occur within 5 miles of a community for safety reasons. The SPRAC is extremely concerned about the continued viability of the WACH and believes that hunters must make every effort to reduce predation on the herd by encouraging them to harvest their bag limit. There are no conservation concerns for bears in Unit 22 and this would increase opportunity.

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

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Game Management Unit 22. The Council provides a public forum for the expression of opinions and recommendations regarding matters related to the subsistence uses of fish and wildlife within the region, and speaks on behalf of 19 communities within the region.

The proposal was developed at the March 2026 Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-052)

Proposal 46

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Reduce the minimum distance from 1 mile to 3/4 mile from a house or permanent dwelling for setting up a bear bait station as follows:

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

Revise the distance under "You may not set up a boat station within 1-mile of a :etc. to 3/4 mile.

This proposal reduces the minimum distance for 1 mile to 3/4 mile for setting up a bear bait station from a house of permanent dwelling, providing more opportunities for hunters without substantially increasing danger from unexpected sudden human/bear conflicts.

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

I would like to see in increase of opportunity, as well as a potential increased harvest in bears, for bear baiting by reducing the minimum distance for 1 mile to 3/4 mile (3960 feet) from a house of dwelling.

Numerous proponents of this proposal have indicated that it is exceedingly difficult to find a legal sight within the existing 1 mile minimum, adding that numerous potential sites at just at or less than 1/10th of a mile under the 1-mile requirement.

This proposal has the potential to increase the harvest of bears that may have a human conflict as black bears are known to travel 2.5 miles and brown bears may travel 10 miles or more to locate food.

A precedent of less than one mile is relatively common. Presently, the following minimum distances are:

Alaska-1 mile from a dwelling or 5280 feet

Maine-0.28 miles from a dwelling or 1500 feet

New Hampshire-300 feet from a dwelling

Idaho-1/2 mile from a dwelling or 2640 feet

WI, MN, WY, MI allow baiting w no mile measurement.

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

The proposer (self) submits this proposal based upon decades of bear baiting experience; difficulty locating a legal site; much scouting and research; and input from multiple users who believe this adjusted distance would increase opportunity while maintaining public safety of non-consumptive users.

The proposer believes this proposal has statewide implementation implications. The proposer would respectfully ask the BOG to take up this proposal for region 3 & 4. Should the BOG take no action or fail in the proposal, the proposer would have the opportunity to revise the proposal for the statewide meeting.

PROPOSED BY: Greg Brush (OI-F26-145)

Proposal 47

5 AAC 92.20. Purchase and sale of game.

Allow the sale and/or barter of gall bladder of brown bear in Units 22A, B, D, and E as follows:

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

5 AAC 92.200, Purchase and sale of game, allow the sale and/or barter of gall bladder of brown bear in Units 22A, B, D, and E.

- (a) In accordance with AS 16.05.920(a) and 16.05.930(e), the purchase, sale, or barter of game or any part of game is permitted except as provided in this section.
 - (b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale:
 - (1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear, and except skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year by permit issued under 5 AAC 92.031;
- a big game trophy, or a black bear trophy of any kind;

- (3) a big game animal skull, except the skull of a black bear, wolf, or wolverine, or a horn or antler that is still attached to any part of the skull;
 - (4) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
 - (5) unsealed marten taken in Units 1 - 7, and 15, or unsealed fisher taken in Units 1 - 5, except as provided in 5 AAC 92.170(a);
 - (6) unsealed beaver taken in Units 1 - 11 and Units 13 - 17;
 - (7) unsealed land otter, lynx, wolf, or wolverine;
 - (8) the meat of big game and small game, except hares and rabbits;
 - (9) the gallbladder of a bear, except in Units 22A, B, D, and E
 - (c) A person may not barter, advertise for barter, or otherwise offer for barter
 - (1) a big game trophy, or a black bear trophy of any kind;
 - (2) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
 - (3) the gallbladder of a bear, except in Units 22A, B, D, and E
 - (d) Notwithstanding (b)(2) and (3) of this section, a licensed taxidermist, estate executor, divorced person, or bankruptcy referee, may sell a skin or trophy by permit issued under 5 AAC 92.031, and the state may sell a skin or trophy as excess property. A person may purchase and possess an animal skin or trophy sold under this subsection. However, a person may not resell a skin or trophy purchased from a seller under this subsection.
 - (e) the barter of subsistence-taken game meat is subject to the following:
 - (1) the following individuals and businesses are prohibited from engaging in the barter of game meat taken for subsistence uses:
 - (A) a person or business holding a license under AS 43.70 or AS 43.75, or its employee, to engage in the commercial sale of the food items or nonedible items provided by the barter exchange; and
 - (B) a person or business licensed under AS 43.70 or AS 43.75, or its employee, to engage in providing the services provided by the barter exchange;
 - (2) the terms of this subsection do not restrict barter of furs and furbearers, or barter of handicrafts;
 - (3) a person may not barter a big game animal horn or antler that is still attached to any part of the skull, or a big game animal skull, except the skull of a black bear, wolf, or wolverine;
- in this subsection, "commercial" means for profit or disposal in commercial channels

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

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) requests the Board of Game allow the sale and/or barter of brown bear gall bladders in Units 22A, B, D, and E in an effort to help the local economy, and as a means to incentivize hunters to harvest their bag limit of brown bears. By allowing the sale and/or

barter of brown bear gall bladder, hunters may be able to recover the cost of fuel. The SPRAC also believes that by allowing this change in regulation, it will help protect the declining Western Arctic Caribou Herd.

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

The proposal was developed at the March 2026 Council meeting at the request of a Council member from Golovin.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-050)

Proposal 48
5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Align the brown bear hunting seasons in Units 22B, 22C, 22D, and 22E for nonresidents as follows:

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

Open Season	Resident (Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		
(20)		
Unit 22(B)		
...		
NONRESIDENT HUNTERS: 1 bear every regulatory year by drawing permit only; up to 40 permits may be issued in combination with Unit 22(C)		<u>Aug. 1 – June 30</u> [AUG. 1 – JUNE 15]
Unit 22(C)		
...		
NONRESIDENT HUNTERS: 1 bear every regulatory year by drawing permit only; up to 40 permits may be issued in combination with Unit 22(B)		<u>Aug. 1 – June 30</u> [Aug. 1 – Oct. 31] [APR. 1 – JUNE 30]
Remainder of Unit 22		

...

NONRESIDENT HUNTERS:

1 bear every regulatory year
by drawing permit only;
40 permits may be issued

Aug. 1 – June 30

[AUG. 1 – JUNE 15] up to

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

Nonresident season dates for brown bear are not consistent among Unit 22 subunits. At the 2024 Board of Game meeting, the split season in Unit 22C was removed for residents but it was retained for nonresidents. The split season in Unit 22C creates unnecessary confusion for hunters and adds complexity to the regulations. Very little harvest of brown bears occurs in Unit 22 during November – March so this extended season, resulting from removing the split season, is not anticipated to create a biological concern.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-032)

Proposal 49

5 AAC 92.067. Units 22 and 23 brown bear permits.

Convert nonresident brown bear hunt DB690 in Units 22D and 22E from a Drawing Permit hunt to a Registration Permit hunt as follows:

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

Convert nonresident brown bear hunt DB690 in Units 22D and 22E from a Drawing Permit hunt to a Registration Permit hunt, with harvest quota to be set annually by ADF&G and season to be closed by emergency order when quota is reached.

Current regulation (5 AAC 92.086, Unit 22D and 22E, nonresident brown bear):

Open to: Nonresidents

Unit/Area: 22D, 22E

Bag Limit & Special Instructions: One bear every regulatory year by permit. If undersubscribed, surplus permits will be available; contact ADF&G in Nome at (907)443-2271

Permit/Hunt #: DB690

Season: Aug.1 - June 15

Proposed regulation (additions in bold underline; deletions in strikethrough):

Open to: Nonresidents

Unit/Area: 22D, 22E

Bag Limit & Special Instructions: One bear every regulatory year by registration permit. **Harvest quota to be announced; season will be closed by emergency order when quota is reached.** ~~If undersubscribed, surplus permits will be available; contact ADF&G in Nome at (907)443-2271~~

Permit/Hunt #: ~~DB690~~ **RB (new number to be assigned)**

Season: Aug.1 - June 15

Note: All other nonresident brown bear requirements remain unchanged, including mandatory guide accompaniment (AS 16.05.407) and evidence of sex requirements.

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

STATEMENT OF ISSUE

Drawing Permit Hunt DB690, the nonresident brown bear hunt for Units 22D and 22E, has issued 30 permits annually for the past five regulatory years, totaling **150 permits issued**. During that same five-year period, total nonresident brown bear harvest in Units 22D and 22E was **5 animals** — a utilization rate of approximately **3.3 percent of issued permits**.

ADF&G has established an acceptable harvest level of approximately **30 brown bears annually** in Units 22D and 22E. The current drawing permit structure is therefore producing nonresident harvest at less than 4 percent of the established sustainable yield, while the resource remains substantially underutilized.

The cause of this underutilization is structural, not a reflection of low demand. Nonresident access to Units 22D and 22E is guide-dependent and economically viable primarily as part of a multi-species trip. The nonresident moose draw permit availability in the area is limited. The majority of hunters who obtain DB690 permits do not travel to the unit because the moose hunt that would anchor their expedition was not obtained through the draw. Bear-only expeditions to Units 22D and 22E are not economically feasible for most nonresident hunters given the remote access costs involved. As a result, DB690 bear permits are routinely obtained but not used, producing a pattern of near-zero nonresident harvest year after year despite full permit issuance.

This underutilization occurs against a management backdrop in which Alaska resident hunters in the same Units 22D and 22E are currently authorized to take **two brown bears per regulatory year under an open general season requiring no permit of any kind**. The Board has therefore already determined that the brown bear population in these units is biologically capable of sustaining broad, unrestricted hunting access. The drawing permit restriction imposed solely on nonresident hunters is producing no conservation benefit and is inconsistent with the unrestricted management approach applied to resident hunters in the identical area.

A registration hunt structure would allow nonresident hunters to access the resource without advance drawing, while retaining full ADF&G management flexibility through emergency order closure authority at the established acceptable harvest quota. Given the remote geographic character of Units 22D and 22E, natural logistical barriers will continue to limit total nonresident harvest well below the sustainable yield ceiling. The proposed change aligns nonresident access with the biological reality that the Board has already acknowledged by authorizing a two-bear, no-permit general season for residents in the same units.

EXPECTED EFFECTS OF PROPOSED CHANGE

Biological: Minimal to none. The brown bear population in Units 22D and 22E is currently subject to a two-bear, no-permit general season for residents. ADF&G's acceptable harvest level of 30 bears annually reflects a population capable of sustaining significant harvest pressure. Nonresident harvest under a registration hunt, given remote access constraints, is unlikely to approach the established quota. ADF&G retains full emergency order closure authority.

Management: Improved. A registration permit system with a harvest quota and mandatory reporting will generate more complete harvest data than the current draw system, in which most permits go unused and harvest is near zero. ADF&G can adjust the annual quota as population data warrants.

Public Opportunity: Increased for nonresident hunters and the licensed guide industry operating in Units 22D and 22E. The change enables outfitters to offer bear hunting as a standalone nonresident product rather than as an add-on to a moose draw that the majority of applicants do not obtain.

Resident Opportunity: Unchanged. Resident hunters in Units 22D and 22E retain their existing two-bear, no-permit general season. A nonresident sub-quota may be established within the overall acceptable harvest level if the Board determines this is appropriate to protect resident opportunity.

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

PROPOSED BY: James Fejes (OI-F26-071)

Proposal 50

5 AAC 92.067. Units 22 and 23 brown bear permits.

Do away with the DB690. Make the non-resident brown bear tags in 22D & E a registration hunt that allows hunters to obtain tags annually as follows:

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

Do away with the DB690. Make the non-resident brown bear tags in 22D & E a registration hunt that allows hunters to obtain tags annually. This also allows hunters to plan out a grizzly hunt better knowing the will have a tag in hand. F&G also has the opportunity to closely monitor this hunt as a registration. Residents are complaining about grizzly encounters and predation on the ungulate population.

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

The restraint of brown bear tag, DB690, availability under the current draw restricts the hunters’ ability to obtain a tag annually. The number of drawing tags was increased last cycle and that has shown no significant increase in the harvest. Note: nearly, if not all hunter’s entered in this draw are in the region to hunt caribou or moose. The bear tag is in-hand on the off-chance of encountering a bear.

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

It was not. I live outside of the local area and was unable to attend those meetings on Zoom due to a schedule conflict.

PROPOSED BY: Justin Horton (OI-F26-183)

Proposal 51

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Change the hunting season and bag limit for coyote in Unit 22 to no closed season and no bag limit as follows:

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

Change the hunting season and bag limit for coyote in Unit 22 to no closed season and no bag limit.

A companion proposal was submitted to change the trapping regulation to the same.

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

In the last several years there has been a dramatic increase in the Coyote population in Unit 22, specifically in 22A. Noticeable population of this predator has expanded into the area which historically has not been present. It is the desire of residents to remove coyotes whenever possible. It is a concern that an increasing coyote population will displace other desired predators (fox, lynx) while having a negative impact on game prey species. The current regulations are restrictive and do not allow maximum flexibility to harvest this undesired predator.

Although prompted by the increase in the coyote population in 22A, applying the regulation to all of Unit 22 is recommended for simplicity. Over the years, most other game units in the State have had regulations changed to no closed season and no limit while hunting coyotes. Among Units 9-26, only Units 18 and 22 are not open year-round and with no limit.

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

SNSAC has discussed this proposal with regional hunters and trappers. The Northern Norton Sound AC is aware of the proposal being submitted.

PROPOSED BY: Wes Jones (OI-F26-064)

Proposal 52

5 AAC 84.270. Furbearer trapping

Change the trapping season for coyote in Unit 22 to no closed season as follows:

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

Change the trapping season for coyote in Unit 22 to no closed season.

A companion proposal was submitted to change the hunting regulation to the same.

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

In the last several years there has been a dramatic increase in the Coyote population in Unit 22, specifically in 22A. Noticeable population of this predator has expanded into the area which historically has not been present. It is the desire of residents to remove coyotes whenever possible. It is a concern that an increasing coyote population will displace other desired predators (fox, lynx) while having a negative impact on game prey species. The current regulations are restrictive and do not allow maximum flexibility to harvest this undesired predator.

Although prompted by the increase in the coyote population in 22A, applying the regulation to all of Unit 22 is recommended for simplicity.

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

SNSAC has discussed this proposal with regional hunters and trappers. The Northern Norton Sound AC is aware of the proposal being submitted.

PROPOSED BY: Wes Jones (OI-F26-063)

Utqiagvik Area – Unit 26A

Proposal 53

5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 26 as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(24)		
...		
Unit 26(A), that portion west of the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155°00' W longitude excluding the Colville River drainage		
1 moose	July 1 - Sept. 14	No open season.

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

To be retained, the antlerless moose season in the portion of Unit 26A west of 156° 00' W longitude and excluding the Colville drainage must be reauthorized annually by the Board of Game (board). This hunt was recently reauthorized by the board at the 2024 board meeting in Kotzebue after being closed for the previous year after the board did not reauthorize it in 2023.

The moose population in the western portion of Unit 26A north of the Colville drainage is somewhat unique compared to the unit-wide population with the distribution being very sparse because there is very little moose habitat in the coastal plain. However, each year a small number of bulls and cows migrate into the area from the major river drainages in the central and southern parts of the unit. To date, the marginal habitat in this portion of Unit 26A has not allowed moose to establish a population and these select few moose provide the only opportunity to harvest a moose in the northwestern portion of Unit 26A.

Unit 26A moose population estimates have historically fluctuated between 294 and 609 moose (2011 - 2014). More recently, moose counts have observed 348 moose and 438 moose in 2018 and 2021, respectively. The overall trend appears to be slow growth after a decline that started in about 2007. The number of moose in the antlerless hunt area is difficult to estimate but is likely approximately 10 moose.

Harvest reports indicate 4 antlerless moose have been harvested since 2005, and the annual harvest rate of antlerless moose is less than 1% of the total population. The preliminary reports for regulatory year 2025 indicate no moose reported harvested in this hunt, but harvest reporting is ongoing and incomplete as of the time of writing for the proposal submission deadline. Due to the estimated low harvest rate, the department recommends reauthorization of the antlerless moose season in this area to provide additional hunting opportunity for the small number of hunters who opportunistically harvest antlerless moose in this remote portion of Unit 26A.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-019)

Bethel Area - Unit 18

Proposal 54

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Extend the Mulchatna Caribou Herd Moratorium for an additional Three (3) years as follows:

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

Putting in place an additional three (3) year moratorium that aligns with the Board of Game meeting every three (3) years to decide if the MCH has a high enough population to open the season again to be able hunt for caribou in Unit 18. Fish and Game is trying to have a target area of at least 30,000 Caribou before they decide to open the season back up for hunting Caribou in Unit 18.

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

Extending the Mulchatna Caribou Herd Moratorium for an additional Three (3) years.

With the most recent three (3) year moratorium that the Board of Game approved back in 2024, the MCH numbers have increased to about 16,000 Caribou. Prior to the Moratorium, Fish and

Game would issue emergency closures of the MCH. With this Moratorium that has been in place, there has also been a predator control in place at the same time during the calving months. With these new born calves being able to survive the first 30 days, it has helped increase the MCH population increase by about 4000 Caribou in 2.5 years

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

The BAC has developed this proposal for the MCH to encourage an additional three (3) year moratorium.

PROPOSED BY: Bethel Fish & Game Advisory Committee Advisory (OI-F26-067)

Proposal 55

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Establish a subsistence registration permit hunt for caribou in the Cape Newenham and Goodnews Bay region as follows:

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

5 AAC 85.025(a)(l8) to read:

Unit 18:

(A) Except as provided in (B) of this paragraph, there is no open season for caribou.

(B) In that portion of Unit 18 **bounded by Goodnews Bay and the Goodnews River on the south, extending east to the Osviak River, and north to Carter Bay, including the Cape Newenham and Togiak coastal region**, caribou may be taken under a subsistence registration permit as follows:

- **Season:** January 1 -February 28
- **Bag Limit:** One caribou per household per regulatory year
- **Harvest Limit:** Not to exceed 70 caribou annually
- **Permit:** Registration permit required
- **Eligibility:** Residents of Togiak, Goodnews, Twin Hills, Manokotak, & Platinum

The department may close the season by emergency order when the harvest limit is reached.

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

This proposal seeks to address a regulatory gap in Unit 18 by recognizing and managing a localized population of caribou in the Cape Newenham and Goodnews Bay region that are consistently present but currently unavailable for legal harvest under state regulations.

Recent Alaska Department of Fish and Game (ADF&G) research identifies these animals as part of the **Cape/Goodnews caribou group**, an outlying population that is monitored separately from the core Mulchatna Caribou Herd (MCH). ADF&G findings indicate that these animals do not meaningfully mix with core MCH groups and occupy distinct seasonal ranges and calving areas (Lichwa and Landsiedel 2024).

Although caribou are observed annually in this area, existing regulations continue to treat them as part of the broader Mulchatna Herd, which is currently closed to hunting. As a result, local subsistence users are unable to utilize a readily available resource, increasing pressure on other important food sources such as moose and fish.

ADF&G has further noted that these outlying groups, including the Cape/Goodnews population, may warrant consideration for **separate management due to their lack of intermixing with core MCH animals and distinct calving behavior** (Lichwa and Landsiedel 2024).

This proposal requests that the Board establish a conservative, subsistence-only hunting opportunity for this localized population, limited to a maximum harvest of 70 animals annually, and restricted to the January-February timeframe when animals are most accessible and impacts to broader herd dynamics are minimized.

The intent is to align regulatory structure with current scientific understanding and observed conditions on the landscape, provide a limited and sustainable subsistence opportunity, and improve clarity and consistency in the management of caribou in Unit 18.

Clarify existing regulatory obligations

This proposal would clarify how caribou present in the Cape Newenham and Goodnews Bay region are classified and managed. ADF&G currently identifies these animals as a distinct outlying group and excludes them from core Mulchatna population estimates, yet they remain regulated under MCH frameworks (Lichwa and Landsiedel 2025).

Establishing a localized management approach would resolve this inconsistency and align regulation with current biological understanding.

Improve or streamline procedures and permitting:

Establishing a localized management structure would allow for a clear and predictable permitting system (e.g., a registration-based subsistence hunt with a defined harvest cap), replacing the current situation where no pathway exists for legal harvest despite the presence of animals.

Reduce administrative burdens

A defined management structure with a fixed winter season (January-February) and conservative harvest limit would reduce the need for emergency actions or unclear enforcement situations, particularly in years when animals are present in accessible areas.

Improve communication procedures

This proposal would provide clear guidance to local residents regarding when and how caribou may be harvested. Aligning regulations with ADF&G-recognized population structure will reduce confusion and improve compliance.

Provide greater transparency with respect to standards and decision-making

By establishing a defined season, harvest cap, and subsistence-only framework, the Board would create a transparent and consistent management approach. This proposal is directly supported by ADF&G findings that the Cape/Goodnews group functions independently from the core Mulchatna herd and may be appropriate for separate management consideration (Lichwa and Landsiedel 2024).

References:

Lichwa, E., and J. Landsiedel. 2024. Mulchatna Caribou Herd Photo Survey Memorandum. Alaska Department of Fish and Game, Division of Wildlife Conservation.

Lichwa, E., and J. Landsiedel. 2025. Mulchatna Caribou Herd Photo Survey Memorandum. Alaska Department of Fish and Game, Division of Wildlife Conservation.

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

Togiak fish and game advisory committee

PROPOSED BY: Togiak Fish & Game Advisory Committee (OI-F26-087)

Proposal 56

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Allow the take of caribou from a motor driven boat in GMU 18 as follows:

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

Allow the take of caribou from a motor driven boat in GMU 18.

5 AAC 92.080. Unlawful methods of taking game; exceptions.

The following methods of take are prohibited:

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

(A) motor-driven boat may be used as follows:

(i) *in Units 23 and 26 to take caribou;*

(ii) *notwithstanding any other provision in this section, in Unit 22 to position hunters to select individual wolves for harvest;*

(iii) *under authority of a permit issued by the department;*

(iv) IN UNIT 18 TO TAKE CARIBOU (AND MOOSE*)

*Moose is being addressed through a separate proposal*Moose is being addressed through a separate proposal

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

The take of caribou from a motor driven boat under power is a common and customary practice throughout Unit 18. The requirement to shut off a boat's motor before shooting is often impractical and unsafe. Currently, State and Federal regulations differ in allowing the take of caribou from a motor driven boat in Unit 18. This creates regulatory complexity for hunters and puts local people at risk of breaking the law, getting citations, and personal injury when carrying out traditional hunting practices.

Safety concerns are the primary reason for seeking this regulatory change. Water and weather conditions throughout the Yukon-Kuskokwim Delta (YKD) are highly variable and can change rapidly when out hunting. Fall storms are increasing in severity, and these storm surges create higher than normal water and faster currents, adding to the concerns. Having full control of the boat is of utmost importance for safety. If a driver has to shut off the motor, they can no longer effectively navigate obstacles that may pop up such as rocks, sweepers, or sandbars, nor can they keep the boat positioned appropriately in the current, which can often be strong.

As mentioned, hunting from a boat under power is a longstanding practice in Unit 18, similar to how residents of Units 23 and 26 harvest caribou in this manner and have been able to legally do so for decades. Customary and traditional methods and means, such as hunting from a motor driven boat, are characterized by efficiency and economy of effort. Starting and stopping a boat motor is not efficient, requires unnecessary effort, and can put hunters at a safety risk.

YKD residents grow up riding in and hunting from boats from a young age. To ensure safety when hunting from a boat, it is customary to select a designated shooter and for them to be positioned in the bow of the boat facing away from any other passengers and toward the shore. When an animal is spotted, the boat driver slows down and positions the boat for a safe and effective shot by the shooter. The requirement to shut off the boat's motor prevents this safe practice from occurring.

Adoption of this proposal would help make traditional hunting methods legal and reduce regulatory complexity. Hunting parties would still have the choice to shut off their boat motor if they deemed it to be safer in their given conditions. As this method of hunting is already practiced, there is no expected increase in hunting accidents. Rather, it would reduce the likelihood of accidents due to the safety concerns with shutting off boat motors as previously stated.

Statewide Federal regulations do not require a boat's motor to be shut-off to take an animal, but do require forward momentum from the boat's motor to have ceased unless otherwise allowed in Unit specific regulations. The take of caribou from a boat moving under power has been legal in Unit 18 under Federal subsistence regulations since 2000.

The YKDRAC is submitting two proposals to the Alaska Board of Game this cycle seeking to align State regulations with Federal ones and allow the take of caribou and moose from a boat moving under power and legalize this longstanding practice.

Legalizing this method of take will not lead to increased harvest of caribou. There is currently no open season for caribou in Unit 18 and the YKDRAC fully supports continued conservation and rebuilding of the Mulchatna Caribou Herd.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. The issue of take of moose and caribou from a boat moving under power was discussed at two separate YKDRAC public meetings and resulted in development of two BOG proposals seeking to legalize this common way of hunting.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-114)

Proposal 57

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

Lengthen the resident only registration moose hunt RM620 in Unit 18 by two weeks to end October 15 as follows:

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

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

Lengthen the resident only registration moose hunt RM620 in Unit 18 by two weeks to end October 15 as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose. (a)(16)

. . . Unit 18, that portion that drains into Kuskokwim Bay south of Carter Bay drainage (59° 10.8' N; 162° 0.2' W) drainage 1 antlered bull by registration permit only Sept. 1 – Oct. 15 [SEPT. 30]

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

Moose are an important subsistence resource for members of the Goodnews Bay and Platinum villages. Due to the increase in food costs, the villages remote locations, and changing environmental factors, food security is a significant and growing concern. Importantly, since 2020, subsistence hunters have not hunted caribou from the Mulchatna caribou herd due to low population numbers. The Mulchatna caribou herd has historically been one of the villages primary food sources. Thus, there is an increased reliance on moose hunting to meet subsistence needs, and the moose population in the area near Goodnews Bay and Platinum have seen an increase in moose population. As the moose population has increased the quota for the fall hunting season has also increased. For the last 10 years we have not come close to meeting this quota.

Extending the season date to October 15th would align the RM 620 hunt with around RM 617 and RM 615 to the north. This increased opportunity where to help local hunters put meat in the freezer and help the department come closer to meeting its quota. Five of the last six years, Goodnews Bay has asked for an extension and we've been given an extension to the 15th of October. This would save time and effort for

both residents and biologists to extend the season permanently. In the last few years the harvest quota has been 40 or more moose but the number of registration permits given out has been less than 30. There's little to no danger of over harvesting with the extended time. With difficulty of getting permits out to villages due to our remoteness, it would be nice if a limited amount were available online.

The hunting season in Quinhagak RM617 and RM615 Zone 2 adjacent to the north of Goodnews Bay drainage is open from September 1 to October 15 in unit 18 hunt area. The Goodnews Bay and Platinum villages propose that its season be extended by 15 days to match those seasons and provide a more meaningful opportunity for Goodnews Bay and Platinum residents to meet subsistence needs.

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

PROPOSED BY: Janet Bavilla (HQ-F26-002)

Proposal 58

5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Modify the RM615 hunt boundary description as follows:

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

Unit 18 Kuskokwim Area, that portion easterly of a line from the mouth of the Ishkowiik River to the closest point of Dall Lake then to east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (60 59.41' N. latitude, 162 22.14' W. longitude), continuing upriver along a line one-half mile south and east of, and paralleling a line along the southerly bank of the Johnson River, continuing a half mile south and east of Crooked Creek past its confluence [TO THE CONFLUENCE OF THE EAST BANK OF CROOKED CREEK, THEN CONTINUING UPRIVER ALONG THE EAST BANK OF CROOKED CREEK TO THE OUTLET AT ARHYMOT LAKE, THEN FOLLOWING THE SOUTH BANK OF ARHYMONT LAKE EASTERLY] to the Unit 18 border and north of and including the Eek River drainage

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

The Unit 18, 19A and 21E border was modified at the March 2014 Statewide Board of Game meeting in Anchorage but the RM615 hunt area was never updated to reflect that change. With the increased popularity and cost of hunting in Unit 18 remainder, some hunters are attempting to reach Unit 18 remainder by portaging from the Kuskokwim River in the area of this proposed border change. As written, the current boundary is ambiguous and continues into 19A to a Unit 18 boundary that no longer exists. The proposed change provides a clear and enforceable boundary of the RM615 hunt area and maintains the intent that the Johnson River and its headwaters are contained within Unit 18 remainder.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-025)

Proposal 59

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

Create a Draw Hunt for Youth hunters from the ages of 10-17 in Unit 18 Zone 1 with season dates of August 1 to August 15 as follows:

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

In-Acting a Draw Hunt for Youth hunters from the ages of 10-17 in Unit 18 Zone 1 with season dates of August 1 st to August 15 th . The number of permits can be determined by Fish & Game by issuing 30% youth / 70% adult DM612 draw hunt winners. If this proposal is approved, this early youth hunt draw will not take effect until 2028 Season.

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

Unit 18 Zone 1 Youth Draw Hunt starting August 1st to August 15 th

With the increase of Moose hunters that are on the Lower Kuskokwim River, there has been questions about doing a Youth Early Draw Moose hunt for Antlerless Moose. Each year there are more hunters on the river trying to fill their harvest ticket for an Antlered Bull, and a lot of the residents of the area are starting to state that the river is getting crowded with hunters. Fall

of 2025 the Lower Kuskokwim had its first antlerless draw hunt which was a success. The Lower Kuskokwim School District is no longer having a week off in September for students, so having this youth draw hunt will give them opportunities in early August to try and harvest an Antlerless Moose.

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

The BAC has developed this proposal with-in its committee and is for future youth hunt opportunities.

PROPOSED BY: Bethel Fish & Game Advisory Committee (OI-F26-065)

Proposal 60

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

Move Unit 18, Zone 2 hunt boundary as follows:

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

Zone 2: In Unit 18, all Kuskokwim River drainages south and east of a line beginning at the confluence of Whitefish Lake and Ophir Creek at the Unit 18 boundary and continuing southwest to the confluence of Tuluksak and Fog Rivers, then southerly to the lower eastern Kisaralik River-Kasigluk River cutoff, then westerly to the western lower Kasigluk River cutoff then to the Akulikutak River where it meets an unnamed creek, coordinates: 60.70057, -161.25313, then westerly to the confluence of the Kwethluk River and Whitefish Net Creek, coordinates: 60.700663, - 161.252974, then southwesterly to the confluence of Eek River and Middle Fork Eek River, then southwesterly to end at 60° 4.983 N, 161° 37.14W

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

Moose Hunting in Zone 2, Change boundaries in Akulikutak and Kwethluk Rivers. Moose hunters from Kwethluk and surrounding villages have to travel 18 airmiles to the Zone 2 boundary using a lot of unleaded gasoline and often times have problems where some people do not reach the Zone 2 boundary when the river is low and have difficulty finding the main river channel.

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

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Chariton Epchook, Organized Village of Kwethluk (HQ-F26-001)

**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 Koyukuk 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

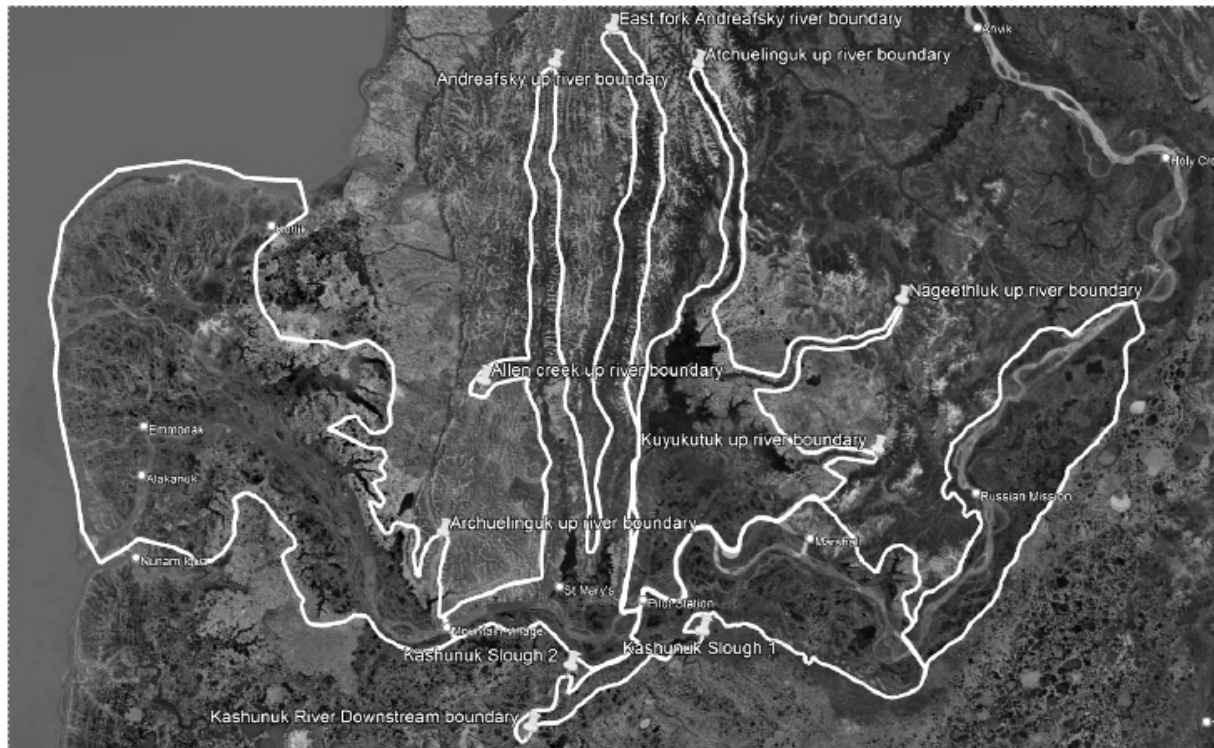
Establishing the Lower Yukon River Management Area and implementing a limited nonresident draw permit system for fall antlered bull moose hunts provides a balanced, proactive solution that:

- 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)

Proposal 62

5 AAC 92.540. Controlled use areas.

Establish the Andreafski Wilderness Controlled Use Area (CUA) within Unit 18 and restrict the use of aircraft in the new CUA as follows:

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

The Board should establish the **Andreafski Wilderness Controlled Use Area** within Unit 18 with exact boundaries to be determined in coordination with others.

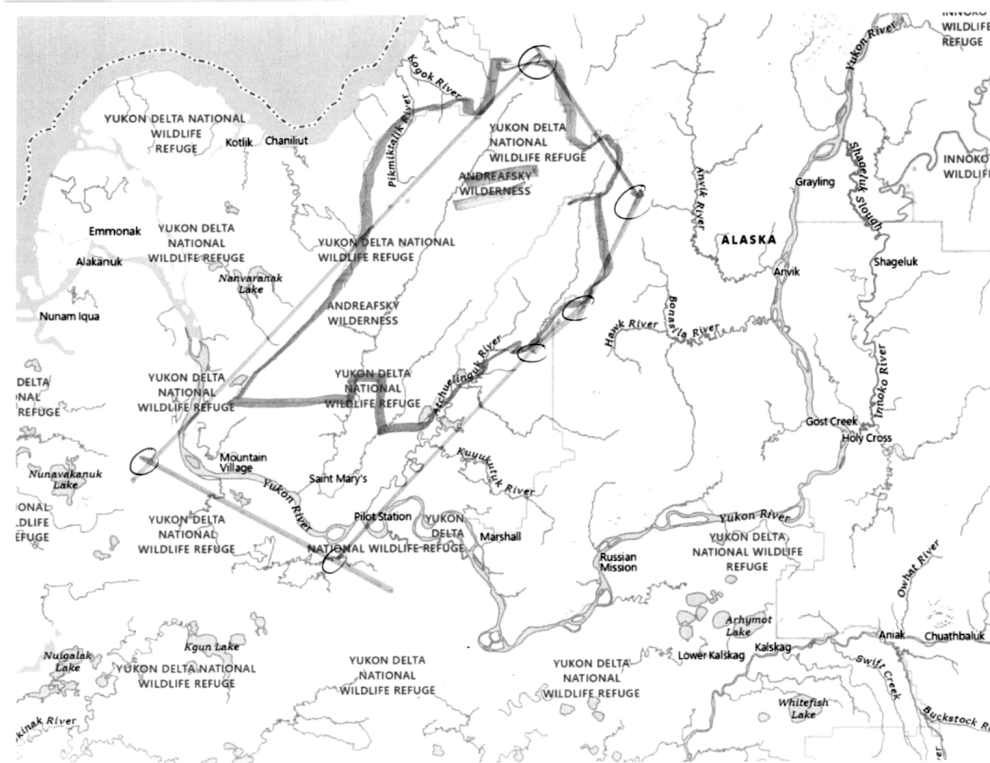
The regulation should read as follows:

(6) Unit 18:

(B) the Andreafski Wilderness Controlled Use Area:

- (i) the area consists of that portion of Unit 18 bounded by a line beginning at 61° 48.76' N. lat., 162° 55.72' W. long. on the Yukon River near Pilot Station, then to 62° 08.28' N. lat., 164° 11.25' W. long., then to 63° 12.85' N. lat., 161° 39.03' W. long., then to 62° 57.67' N. lat., 161° 09.10' W. long., then to the Yukon River, then along the north bank of the Yukon River back to the point of beginning and also include the Black River Drainage area and all of its tributaries. A rough draft map is included with this proposal to show the general area but does not include the Black River area that was added to this proposal.
- (ii) 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;

- (iii) the meat of the hindquarters, forequarters, and ribs of any moose taken in the area must remain on the bone until the moose has been transported out of the area or processed for human consumption;



**A color version is available online at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>*

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

Unit 18, Andreafski Wilderness area, currently lacks aircraft restrictions for moose hunting. Aircraft provide hunters with a significant and disproportionate harvest advantage over other hunters using boats or other ground-based means. Left unmanaged, this depletes animals from areas that boat-based hunters depend on before those hunters can reach them. In addition, local hunters have reported concerns about wanton waste.

Comparable management measures have proven effective in nearby areas. The Paradise Controlled Use Area (CUA) in Unit 21E has restricted aircraft use for moose hunting since 1977 and continues to meet its intended objectives. Other CUAs, such as the Koyukuk CUA in Units 21 and 24, include provisions specifically intended to reduce waste and improve meat salvage.

Aircraft restrictions are already in place along portions of the Yukon River corridor, including the Kalskag CUA in Unit 18 and the Paradise CUA in Unit 21E. However, a significant gap remains. Establishing an Andreafski Wilderness CUA would fill this gap, extending protections into the wilderness area that are not currently covered by existing CUAs.

Without action, subsistence users will continue to lose effective access to moose in the areas closest and most accessible to their communities.

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

This proposal was developed in coordination with the Yukon-Kuskokwim Delta Regional Tribal Government (Y-K RTG) and subsistence users and community members. Input was gathered from participants in-person at the Y-K RTG Governance Summit subsistence workgroup meeting held in December 2025 and again virtually on April 7, 2026. The proposal was presented to and adopted by the Mid-Lower Yukon Advisory Committee as their own with an amendment to include the Black River and Kusilvak area.

PROPOSED BY: Mid-Lower Yukon Fish & Game Advisory Committee (OI-F26-058)

Proposal 63

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

Lengthen the resident moose hunting season in GMU 18 remainder to open July 16 as follows:

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

Lengthen the resident moose hunting season in GMU 18 remainder to open July 16 as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose

RESIDENT HUNTERS:

Remainder of Unit 18

3 moose of which only 1 may be an antlered bull; a person may not take a calf or a cow accompanied by a calf

JULY 16 [Aug. 1] - Sept. 30

3 antlerless moose

Oct. 1 - Nov. 30

3 moose

Dec. 1 - Apr. 30

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

The Unit 18 remainder moose population is very high and there are local concerns about over-browsing and habitat degradation. There are no conservation concerns for moose and additional harvest can be supported. There are so many moose at times they are causing safety issues in the villages. There are major food security concerns due to salmon shortages that an additional harvest opportunity could help mitigate. It is unlikely that urban hunters would travel to this remote part of the State in the summer while the weather is warm, but local people would be able to hunt close to home and get meat into the freezer quickly reducing the chance of spoilage.

The Federal Subsistence Board recently passed WP26-45 which extended the Unit 18 remainder Federal moose season to open July 16. This proposal seeks to align State and Federal opportunity for Alaska residents and reduce regulatory complexity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. Extending the resident moose season in Unit 18 remainder was discussed in two separate YKDRAC public meetings and supported by attendees.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-110)

Proposal 64

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

Shorten the non-resident fall moose hunting season in GMU 18 remainder to open Sept. 10 as follows:

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

Shorten the non-resident fall moose hunting season in GMU 18 remainder to open Sept. 10 as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose

Remainder of Unit 18

NONRESIDENT HUNTERS:

1 antlered bull

SEPT. 10 [Sept. 1] - Sept. 30

1 antlerless moose

Dec. 1 - Mar. 15

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

Moose numbers in Unit 18 are very high and it is becoming a very popular area for hunting by nonlocal Alaska residents, nonresidents, and guided and drop off hunts. The high moose population is a complex problem because moose need to be harvested so that their numbers don't get so high that they crash.

However, the influx of outsiders is creating increasing competition with local residents and there are also increasing reports of trespassing on Native Corporation lands and Native allotments, as well as reports of wanton waste. When meat is donated to communities, it is often already starting to go bad.

This proposal seeks to delay the start of the non-resident moose season to open Sept. 10 to allow resident hunters an opportunity to fill their freezers first. Delaying the start of the non-resident season will help reduce conflicts by decreasing overlap between user groups and giving a priority to Alaska residents. Moving the nonresident season to open later will also result in hunting during cooler weather and help reduce meat spoilage.

Although outside the scope of this proposal, the YKDRAC wants to note that the vastness of the YK Delta makes it challenging for law enforcement to patrol during the hunting season. We encourage more law enforcement in the area during the fall hunting season, and request the establishment of hunter checkpoints

at hub community airports like Bethel, Emmonak, and St. Mary’s to ensure meat is being salvaged properly and to reduce wanton waste.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. Shortening the nonresident moose season in Unit 18 remainder was discussed in two separate YKDRAC public meetings and supported by attendees.

PROPOSED BY: Yukon-Kuskokwim Delta Regional Advisory Council (YKDRAC) (OI-F26-109)

Proposal 65

5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 18 as follows:

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

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		

(16)

Unit 18 Kuskokwim Area, that portion easterly of a line from the mouth of the Ishkowik River to the closest point of Dall Lake then to east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (60 59.41’ N. latitude, 162 22.14’ W. longitude), continuing up-river along a line one-half mile south and east of, and parallel-ing a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then con-tinuing upriver along the east bank of Crooked Creek to the outlet at Arhymot lake, then following the south bank of Arhymont Lake easterly to the

Unit 18 border and north of
and including the Eek River
drainage

...

1 antlerless moose by
drawing permit only, up
to 100 permits may be issued

Sept. 1-Oct. 15

No open season.

...

Unit 18, that portion that drains
into Kuskokwim Bay south of
the Carter Bay drainage

...

1 moose by registration
permit only; to be
announced by emergency order

Dec. 1—Mar. 31
(Season to be announced)

No open season.

Remainder of Unit 18

RESIDENT HUNTERS:

3 moose; of which only 1 may be
an antlered bull; a person may not
take a calf or a cow accompanied
by a calf; or

Aug. 1—Sept. 30

3 antlerless moose; or

Oct. 1—Nov. 30.

3 moose

Dec. 1—April 30.

NONRESIDENT HUNTERS:

1 antlerless moose

Dec. 1— Mar. 15

...

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

To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually by the Board of Game (board). The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014

board meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area and nonresident antlerless hunt was adopted at the January 2017 board meeting in Bethel. The Kuskokwim hunt was adopted at the January 2024 board meeting in Kotzebue. Both the Remainder and Goodnews antlerless hunts were amended at the board meeting in 2020 in Nome. The board has previously reauthorized the antlerless moose season for resident hunts in Unit 18 remainder for regulatory year (RY) 2016 through RY2026. This proposal requests reauthorization for RY2027.

Implementation of antlerless hunts began in 2007 and has continued each year due to increased moose abundance, productivity, and population growth along the Yukon River drainage in Unit 18. Based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated to be 20,000 animals with calf:cow ratios ranging from 36:100 to 61:100, and twinning rates from 15% to 50% for all areas. Population growth and range expansion continues in this portion of Unit 18. Although the population has declined by about 20% in the past 5 years it is still remains near historic highs.

Although the current year’s harvest data in the Remainder of Unit 18 has not been finalized because the season is still open, harvest is expected to be similar to the past 4 years and well below sustained yield for this robust population. In RY2024 the antlerless harvest in Unit 18 remainder was 147 moose. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18. Additionally, the nonresident antlerless moose hunt has had very low participation, and in 2024 there were 4 cows harvested by nonresidents. Nonresident harvest has been eight antlerless moose (all cows) in the previous past 5 years.

The moose population in the Goodnews River drainage had grown steadily in the past 15 years following a closure in 2004. The fall hunt had a quota of 10 for the first few years of the hunt and recently increased to 45. Even though the department has not closed the season by emergency order, in the past few years the quota was not meet. In the 7 years that the winter hunt has been held, harvest has been low (with a range of 0-6 animals harvested). The March of 2024 survey found 450 moose and, based on the steady growth in moose populations and productivity, the department proposes continued antlerless moose hunts in the Goodnews River Drainage.

In January of 2024 at the board meeting in Kotzebue, the board adopted a drawing hunt for antlerless moose on the Kuskokwim River. The first hunt was held in the fall of 2025. In February of 2024, the midpoint of the population estimate was 3,336 moose in Zone 1 of the Kuskokwim hunt area. In the same month, an additional 2,327 moose were counted in a minimum count of zone 2 of the hunt area. In the DM612 hunt, in the fall of 2025, the department issued 100 permits. Of these, 84 permit holders reported hunting, and 49 harvested antlerless moose. Following a moratorium the Kuskokwim moose population has experienced rapid growth and range expansion and is starting to see early signs of resource limitation and high browse removal rates.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-012)

Proposal 66

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

Restrict the sale of moose antlers in Unit 18, unless naturally shed or used in handicraft as follows:

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

This regulation would limit the sale of moose antlers in unit 18 to only those that are naturally shed.

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

92.200(b)The antler of a moose taken in unit 18, unless the antler is a naturally shed antler or has been made into a article of handicraft;

92.200(c) the antler of a moose taken in unit 18, unless the antler is an article of handicraft;

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

PROPOSED BY: Pitka's Point Traditional Council (OI-F26-043)

Proposal 67

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

Limit the sale of moose antlers in unit 18 to only those that are naturally shed as follows:

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

This regulation would limit the sale of moose antlers in unit 18 to only those that are naturally shed.

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

92.200(b)The antler of a moose taken in unit 18, unless the antler is a naturally shed antler or has been made into a article of handicraft;

92.200(c) the antler of a moose taken in unit 18, unless the antler is an article of handicraft;

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

PROPOSED BY: Mid-Lower Yukon Fish & Game Advisory Committee (OI-F26-056)

Proposal 68

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

Upon harvested moose or at time of kill, a portion of the antler must be sawed off to destroy the trophy value as follows:

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

Upon harvested moose or at time of kill, a portion of the antler must be sawed off to destroy the trophy value.

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

The issue is illegal harvest, waste of moose and criminal activity and the effect of illegal taking of moose / head hunters / waste meat / illegal sale

Illegal activity such as head hunting and wanton waste has been going on for the past two years. If nothing is done now, there will be more illegal activity, which may get worse.

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

This proposal was submitted as an ACR by Melvin Paukan and later adopted by the Mid-Lower Yukon AC as their own proposal.

PROPOSED BY: Mid-Lower Yukon Fish & Game Advisory Committee (OI-F26-057)

Proposal 69

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

Allow the take of moose from a motor driven boat in GMU 18 as follows:

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

Allow the take of moose from a motor driven boat in GMU 18

5 AAC 92.080. Unlawful methods of taking game; exceptions.

The following methods of take are prohibited:

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

(A) motor-driven boat may be used as follows:

(i) in Units 23 and 26 to take caribou;

(ii) notwithstanding any other provision in this section, in Unit 22 to position hunters to select individual wolves for harvest;

(iii) under authority of a permit issued by the department;

(iv) IN UNIT 18 TO TAKE MOOSE (AND CARIBOU*)

*Caribou is being addressed through a separate proposal

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

The take of moose from a motor driven boat under power is a common and customary practice throughout Unit 18. The requirement to shut off a boat's motor before shooting is often impractical and unsafe. Currently, State and Federal regulations differ in allowing take of moose from a motor driven boat in Unit 18. This creates regulatory complexity for hunters and puts local people at risk of breaking the law, getting citations, and personal injury when carrying out traditional hunting practices.

Safety concerns are the primary reason for seeking this regulatory change. Water and weather conditions throughout the Yukon-Kuskokwim Delta (YKD) are highly variable and can change rapidly when out hunting. Fall storms are increasing in severity, and these storm surges create higher than normal water and faster currents, adding to the concerns. Having full control of the boat is of utmost importance for safety. If a driver has to shut off the motor, they can no longer effectively navigate obstacles that may pop up such as rocks, sweepers, or sandbars, nor can they keep the boat positioned appropriately in the current, which can often be strong.

As mentioned, hunting from a boat under power is a longstanding practice in Unit 18, similar to how residents of Units 23 and 26 harvest caribou in this manner and have been able to legally do so for decades. Customary and traditional methods and means, such as hunting from a motor driven boat, are characterized by efficiency and economy of effort. Starting and stopping a boat motor is not efficient, requires unnecessary effort, and can put hunters at a safety risk.

YKD residents grow up riding in and hunting from boats from a young age. To ensure safety when hunting from a boat, it is customary to select a designated shooter and for them to be positioned in the bow of the boat facing away from any other passengers and toward the shore. When an animal is spotted, the boat driver slows down and positions the boat for a safe and effective shot by the shooter. The requirement to shut off the boat's motor prevents this safe practice from occurring.

Adoption of this proposal would help make traditional hunting methods legal and reduce regulatory complexity. Hunting parties would still have the choice to shut off their boat motor if they deemed it to be safer in their given conditions. As this method of hunting is already practiced, there is no expected increase in hunting accidents. Rather, it would reduce the likelihood of accidents due to the safety concerns with shutting off boat motors as previously stated.

Statewide Federal regulations do not require a boat's motor to be shut-off to take an animal, but do require forward momentum from the boat's motor to have ceased unless otherwise allowed in Unit specific regulations. The take of moose from a boat moving under power has been legal in the lower Yukon portion of Unit 18 under Federal subsistence regulations since 2010, and throughout Unit 18 remainder since 2012.

The BOG considered a similar proposal in 2011 although it ultimately did not pass. In its comments, ADF&G stated, "in locations where traditional methods have been used for harvest, particularly the use of boats for the taking of caribou in Units 23 and 26(A), the method has been approved." The YKDRAC represents local users across Unit 18 with a vast array and depth of traditional knowledge, and in this context, implores the BOG to understand that hunting from a boat is a traditional method of harvest in Unit 18, similar to Units 23 and 26A

The YKDRAC is submitting two proposals to the Alaska Board of Game this cycle seeking to align State regulations with Federal ones and allow the take of caribou and moose from a boat moving under power and legalize this longstanding practice. Then, the YKDRAC plans to submit a proposal to the FSB during the next call for Federal wildlife regulatory cycle requesting to extend the take of moose from a motor driven boat throughout the entirety of Unit 18.

Legalizing this method of take will not lead to increased harvest of moose as this already a commonly practiced method of hunting that is already allowed under Federal regulations. There are no conservation concerns for moose and in some areas of Unit 18 moose numbers are so high that browse surveys indicate habitat is approaching carrying capacity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. The issue of take of moose and caribou from a boat moving under power was discussed at two separate YKDRAC public meetings. The discussion resulted in development of two BOG proposals to legalize this customary hunting practice under State regulations.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-115)

Proposal 70

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Modify the Musk Ox hunts DX001 and DX003 resident and nonresident allocations as follows:

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

R- Musk ox- DX001- 4

NR- Musk Ox- DX###- 1

R- Musk Ox- DX003- 36

NR- Musk Ox- DX###- 4

R- RX070

R- RX071

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

I would like to see Musk Ox tags split between non residents and residents. DX001 had 60% go to non residents and DX003- had 35% go to non residents in 2026. This is unacceptable and the tags should be split out so this overrun does not happen.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins (OI-F26-007)

Proposal 71

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Modify Musk Ox hunts DX001 and DX003 to resident only hunts as follows:

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

B- Musk Ox changed to R only for Nunivak and Nelson Island.

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

I would like to see Musk Ox go to resident only. Nonresidents coming to Alaska have ample opportunity elsewhere to hunt Musk ox in Canada and Greenland. There is a short supply of draw tags for musk ox within the state, and the resident pool of applicants far exceeds availability. There is minimal revenue to the state based on nonresidents applying a successfully drawing the tag. Residents are still required to hire a transporter. This gives money to the villages and gives residents opportunities. Last year, DX001 had a 60% NR draw rate. DX003 had a 35% draw rate. This is unacceptable and goes against ANILCA.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-008)

Proposal 72

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX001, to “up to” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX001, to “up to” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Muskox drawing hunt DX001.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Muskox hunting in Alaska is the only location in North America where a Non-Resident hunter could hunt Muskox without a guide, making it a highly desirable opportunity. Meat value of a Muskox is high and obtaining Muskox permits even among local community members is difficult and both Residents and Non-Residents compete for the tags equally in the Big Game Drawing.

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

No

PROPOSED BY: Craig Van Arsdale (OI-F26-142)

Proposal 73

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX003, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX003, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Muskox drawing hunt DX003.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Muskox hunting in Alaska is the only location in North America where a Non-Resident hunter could hunt Muskox without a guide, making it a highly desirable opportunity. Meat value of a Muskox is high and obtaining Muskox permits even among local community members is difficult and both Residents and Non-Residents compete for the tags equally in the Big Game Drawing.

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

No

PROPOSED BY: Craig Van Arsdale (OI-F26-143)

Proposal 74

5 AAC 92.008. Harvest guideline levels.

Change the location of Nelson Island muskox registration permit availability to reflect the change from Newtok to Mertarvik as follows:

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

5 AAC 92.008. Harvest guideline levels.

(4) Musk oxen on Nelson Island in Unit 18 shall be managed by registration permit hunts based on the harvestable portion of the population, as follows:

- (A) if 150 permits are available
 - (i) 65 of the available permits will be issued on a first-come, first-served basis in the 5 villages of Nightmute, Tununak, **Mertarvik** [NEWTOK], Chefnak and Toksook Bay on an annual rotating basis; remaining permits after issuance will be issued as follows;
 - (ii) 20 of the available permits will be issued in Bethel; and
 - (iii) 65 of the available permits will be issued online, with up to 5 issued to nonresidents;
 - (B) if more or less than 150 permits are available
 - (i) 44% of the available permits will be issued on a first-come, first-served basis in the 5 villages of Nightmute, Tununak, **Mertarvik** [NEWTOK], Chefnak and Toksook Bay on an annual rotating basis; remaining permits after issuance will be issued as follows;
 - (ii) 12% of the available permits will be issued in Bethel; and
 - (iii) 44% of the available permits will be issued online, with up to 8% allocated to nonresidents;
 - (iv) in order to achieve the desired number of permits, allocations will be adjusted proportionately until the allocation for Nightmute, Tununak, **Mertarvik** [NEWTOK], Chefnak and Toksook Bay reaches no less than 40 permits; the allocation for online and Bethel will then continue to be reduced proportionately.

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

The community of Newtok has relocated to a new location on Nelson Island, and the name of the new community is Mertarvik. Moving the community began in 2019, and there are no longer any residents in the old location of Newtok. The new location is approximately 9 miles from the original location. The regulation needs to be updated to reflect the move, and the board will need to determine if the existing pattern of issuance in regulation is still desirable given the new location of the community.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-038)

Proposal 75

5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Open a mainland musk oxen hunt in Unit 18 as follows:

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

Create a limited mainland musk oxen registration hunt in GMU 18 with harvest tags available in a community within the hunt area.

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

Open a mainland musk oxen hunt in Unit 18

There has been increase of musk oxen in Unit 18 with 450 counted, on the mainland and by opening a hunt more subsistence opportunity would be available to local people who could take advantage of the growing population. There has been testimony at the Regional Advisory Council meetings that people feel that it is time. With the restrictions on salmon in the area and the low numbers of Mulchatna caribou, this hunt could be another food source for us.

For that reason, we would suggest a registration hunt with tags available in a community within the hunt area.

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

Proposal created and submitted by Central Bering Sea Fish & Game Advisory Committee

PROPOSED BY: Central Bering Sea Fish and Game Advisory Committee (HQ-F26-040)

Proposal 76

5 AAC 92.011. Taking of game by proxy.

Add muskoxen in Unit 18 to game that is allowed to be taken by proxy hunt as follows:

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

5 AAC 92.011(k). Taking of game by proxy. Include muskox on the list of species that can be taken under a proxy permit as follows: Add language to 5 AAC 92.011(k) Proxy hunting under this section is only allowed for

- (1) caribou;
- (2) deer;
- (3) moose in Tier II hunts, any-bull hunts, antlered-bull hunts without antler restrictions, and antlerless moose hunts; and
- (4) emperor geese;
- (5) muskoxen in Tier II hunts **and muskoxen in Unit 18**

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

This proposal seeks to allow proxy hunting in registration hunts of muskoxen hunts in Unit 18. Unit 18 was overlooked in getting proxy hunting in our area despite local Advisory Committees wanting to add our unit's muskoxen hunt to the proposal submitted before to allow muskoxen in Tier II hunts but these suggestions were in comments. While unit 18 is allowed educational hunts on muskoxen, this doesn't cover people who may have waited years to get the limited registration hunts and miss opportunities for harvest when a permit holder may become disabled or for whatever reason.

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

Central Bering Sea Advisory Committee

PROPOSED BY: Central Bering Sea Advisory Committee (HQ-F26-039)

Proposal 77

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Amend Bear baiting in Unit 18 to two seasons July 1 - Oct 31 /Apr 1 - Jun 30 as follows:

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

If a Fall Season is added to Unit 18 current regulations / season. This will enable the Hunter / Subsistence User to being able to take a Bear or Bears that are in season. Over the past 5 years, with the Current Regulations, some Hunters / Subsistence Users have been only able to hunt for about 2-3 weeks, due to Flooding of Bear Baiting sites and Bears not showing up till the last 2 weeks of the Bear Baiting Season.

Season Dates that are proposed for the new regulations are as follows.

Unit 18 July 1 - Oct 31 /Apr 1 - Jun 30

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

The Bethel Advisory Committee proposes to have a Spring and Fall Bear Baiting Seasons in the State of Alaska in Unit 18 where Bear Baiting is Legal. Hunters &

Subsistence users will have better opportunity to take bears if a Fall Bear Baiting Season is added to Unit 18's current Bear Baiting Season and Regulations. In certain Units throughout the State, Hunters & Subsistence Users may only have two (2) to three (3) weeks to legally take a Black or Brown when in season dates. Current Dates for Bear Baiting

Unit 18 Apr 1 – Jun30

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

The Bethel AC has developed this proposal for Unit 18 Hunters and Subsistence Users.

PROPOSED BY: Bethel Fish & Game Advisory Committee (OI-F26-066)

Proposal 78

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Allow the use of cellular trail cameras for spring bearbaiting in unit 18 as follows:

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

The use of Cell trail cameras are legal to use during the spring bearbaiting season and only during the bear baiting season.

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

I would like to see cellular trail cameras, used for spring bearbaiting in unit 18.

This would allow for hunters to save money on gas and time in order to harvest black and brown bears that tend to kill our moose calves in the spring .

If nothing has changed then the status quo of using a trail camera will stay the same. Hunters will have to physically go and check their trail cameras to see if any bears have hit their bait.

By using a cellular trail camera, we might be able to get more hunters in the woods to control the population of bears so our moose population can continue to flourish on the Kuskokwim River.

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

PROPOSED BY: Rafe Johnson

(OI-F26-037)

Proposal 79

5 AAC 85.056. Hunting seasons and bag limits for wolf.

Increase the wolf harvest limit in GMU 18 from 10 to 15 wolves as follows:

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

Increase the wolf harvest limit in GMU 18 from 10 to 15 wolves

5 AAC 85.056. Hunting seasons and bag limits for wolf

Unit 18

RESIDENTS/NONRESIDENTS:

Aug. 10 - Apr. 30

15 [10] wolves

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

Wolf numbers are high in Unit 18 and this proposal seeks to increase hunting opportunity for their harvest. There are no conservation concerns for wolves. The Department is conducting predator control of wolves to help the Mulchatna Caribou Herd recover. There are increased reports from area residents about wolves in and near communities that are causing safety concerns for people and pets.

The Federal Subsistence Board recently passed WP26-48, which increased the Federal hunting bag limit to 15 in Unit 18. This proposal seeks to align State and Federal hunting regulations for all hunters and reduce regulatory complexity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. Increasing the wolf harvest limit was discussed at two separate YKDRAC public meetings and there was support by attendees.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

(OI-F26-112)

Proposal 80

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Increase the coyote hunting bag limit in GMU 18 from 2 to 4 coyotes and extend the hunting season to Aug. 15 – May 31 as follows:

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

Increase the coyote hunting bag limit in GMU 18 from 2 to 4 coyotes and extend the hunting season to Aug. 15 – May 31:

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

(1) Coyote

Units 1-5, 18, and 22

AUG. 15 – MAY 31 [Sept. 1 - Apr. 30]

4 [2] coyotes

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

The number of coyotes in Unit 18 has been increasing over time. Coyotes are new to this area of the state. There are no conservation concerns and additional harvest opportunity can be supported.

Additionally, coyotes are being increasingly reported in and near communities, causing safety concerns for children and pets.

The Federal Subsistence Board recently adopted WP26-49, which increased the Federal hunting bag limit to 4 in Unit 18 and extended the hunting season to August 15-May 31. This proposal seeks to align State and Federal regulations for all hunters and reduce regulatory complexity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. This proposal was discussed at two separate YKDRAC public meetings, and there was support by attendees.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-113)

Proposal 81

5 AAC 84.27; 92.080. Furbearer trapping; Unlawful methods of taking game; exceptions.

Allow the use a motorized boat under power to position a hunter for a shot on a beaver in a river, lake, or pond in GMU 18 as follows:

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

A motorized boat under power can be used to position a hunter for a shot on a beaver in a river,lake or pond.

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

I would like to see a change in how beavers can be harvested by firearms or Archery equipment in unit 18.

My proposal would allow for positioning of a boat to shoot a beaver using motorized power.

This is NOT to chase or harass beavers while swimming in the water

The beaver population in unit 18 has been growing for the last 30 years. There are no signs of it being decimated by trappers, hunters or predators.

Taking of a beaver, using positioning by a motorized boat would allow for a cleaner kill and cut back on the loss of beavers, sinking in the river or lakes.

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

PROPOSED BY: Rafe Johnson

(OI-F26-038)

Interior and Eastern Arctic Meeting

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ALASKA BOARD OF GAME
Interior and Eastern Arctic Region Meeting
Pike's Waterfront Lodge, Fairbanks, Alaska
March 19-26, 2027

TENTATIVE AGENDA

Note: This Tentative Agenda is subject to change throughout the course of the meeting. It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

Friday, March 19, 8:30 a.m.

OPENING BUSINESS

Call to Order / Purpose of Meeting

Introductions of Board Members and Staff

Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting. Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

Saturday, March 20, 8:30 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

Sunday, March 21, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

Monday, March 22 thru Thursday, March 25, 8:30 a.m.

BOARD DELIBERATIONS continued

Friday, March 26, 8:30 a.m.

BOARD DELIBERATIONS continued/conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

Agenda Notes

1. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
2. A live audio stream for the meeting is intended to be available at: www.boardofgame.adfg.alaska.gov
3. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-4110 no later than two weeks prior to start of the meeting to make any necessary arrangements.

Regionwide and Multiple and Multiple Units

Proposal 82

5 AAC 92.08. Unlawful methods of taking game; exceptions.

Allow the use of cellular cameras for the taking of black bear and brown bear over bait in GMUs 12, 19, 20, 21, 24, 25, 26B, and 26C during applicable seasons for non-commercial users as follows:

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

5 AAC 92.080 - [Effective until 7/1/2025] Unlawful methods of taking game; exceptions

7 (H) any camera or other sensory device that can send messages through wireless communication; **except that cameras that can send messages through wireless communication may be used by non-commercial bear baiters in GMUs 12, 19, 20, 21, 24, 26B and 26C at legal bear bait stations during the applicable black and/or grizzly bear seasons**

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

Allow the use of cellular cameras for the taking black bear and brown bear over bait in its GMUs 12, 19, 20, 21, 24, 25, 26B, and 26C during applicable seasons for non - commercial users. This allows an easily enforceable regulation for law enforcement with concise purpose of use and time when these cameras can be used.

Currently hunters are not allowed to use any camera or other sensory device that can send messages through wireless communication. This includes cellular game cameras over bear bait. These were prohibited with the assumption that this would give an unfair advantage to hunters, yet despite when the hunter gets a photo, he would still have to travel to hunt his bait station often requiring hours of travel that is not feasible in a reasonable amount of time, or the day of the picture was taken. In the name of safety, a hunter with young children could have the knowledge that a bear was on the bait and approach with extreme caution. In these units, hunters are allowed to hunt bears same day airborne provided they are 300 feet from a plane.

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

Yes, this proposal was developed by the Delta Fish & Game Advisory Committee.

PROPOSED BY: Delta Fish & Game Advisory Committee (OI-F26-153)

Proposal 83

5 AAC 92.08. Unlawful methods of taking game; exceptions.

In all of unit 20 cellular cameras maybe used during bear baiting seasons. Cameras must be within a 100 yds of bait as follows:

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

In all of unit 20 cellular cameras maybe used during bear baiting seasons. Cameras must be within a 100 yds of bait.

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

The current prohibition in 5 AAC 92.080(7)(H) bans any “camera or other sensory device that can send messages through wireless communication.” This prevents the use of stationary cellular trail cameras at registered bear bait stations in Unit 20. Bear baiting is already a legal, selective management tool (not traditional “fair chase”), yet hunters are forced to make repeated, often unnecessary physical checks of bait sites. This results in hundreds of dollars in wasted fuel.

If nothing changes, baiters will continue burning unnecessary fuel (Interior Alaska gasoline currently averages \$3.34/gallon in Fairbanks and up to \$6+ in rural areas) on multiple weekly trips per station. Youth and less-mobile hunters will be discouraged because real-time viewing from home is impossible. Cellular cameras can allow hunters to notify AWT of possible poaching or site tampering without having to encounter the perpetrator. Cellular cameras change none of the biological outcomes: bag limits remain three black bears per year (no closed season) and one brown/grizzly bear per year (with subunit-specific seasons and permits), bait stations stay registered, and bears continue to come and go as they please.

Facts supporting adoption:

- Alaska’s statewide black bear population is stable at approximately 100,000 animals. In GMU 20D (a representative subunit), the population is healthy and stable with an estimated 750 adult bears; average annual harvest is only 37 bears (66% male, just 25% taken over bait), well within sustainable objectives (≤ 15 south and ≤ 35 north of the Tanana River). Similar low, sustainable harvest occurs across Unit 20.
- In the vast majority of U.S. states where cellular cameras are fully legal, there is no evidence of increased overharvest or population declines—harvest remains controlled by bag limits and seasons, exactly as it would in Unit 20.
- Cameras provide real safety and efficiency benefits without any downside: they notify hunters only when activity occurs, reducing total trips, habitat disturbance, and the ability to prosecute hunter harassment or poaching.

Other solutions (more frequent physical checks or non-cellular cameras) were rejected because they do not deliver real-time data, cost savings, or safety improvements. Cellular cameras cannot

kill animals or exceed bag limits—they simply let hunters (and their kids at home) watch in real time.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-161)

Proposal 84

5 AAC 85.XXX. Seasons and bag limits for cougars/mountain lion

Establish an open hunting and trapping season for cougars in the Northern Region, Units 12, 19-21, 24, 25, 26B and 26C as follows:

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

Establish an open season for cougars in the Northern Region, Units 12, 19-21, 24, 25, 26B and 26C. Hunting season: No closed season

Trapping season: November 1 to April 30

You may not trap cougars with a steal trap or snare smaller than 3/32 inch in diameter during April Limit: No limit

Salvage Requirements: Skull and hide.

Sealing Requirements: Skull and hide will be presented for sealing within 10 days of kill.

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

Alaska's struggling ungulate population do not need new and potentially growing source of predation. Establishing seasons so that cougars can be legally taken would allow people to harvest cougars and provide valuable data to the ADF&G on the presence and distribution of cougars in the interior region.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-166)

Proposal 85

5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the resident brown bear tag fee exemptions for the Interior and Northeast Alaska (Region 3) as follows:

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

5AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the resident brown bear tag fee exemptions for the Interior and Northeast Alaska (Region 3) as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

(4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

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

The Board of Game must annually reauthorize all resident brown bear tag fee exemptions. The Board of Game put resident brown bear tag fees in place statewide during the mid-1970s to discourage incidental harvest, elevate the status of brown bears to trophies, and to provide revenue. Today, populations in the aforementioned units are abundant, and brown bears continue to be highly regarded as trophies. Across the region, season dates and bag limits effectively regulate harvest in areas where interest is high.

Eliminating all resident brown bear tag fees throughout Region 3 simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization would assist with the department objective of managing Region 3 brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically. Reauthorizing these tag fee exemptions would allow residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, to legally harvest brown bears. During regulatory years 2014–2024, approximately 20% of brown bears harvested by resident hunters in Region 3 were taken incidentally to other activities, compared to 8% statewide.

Human-caused mortality of brown bears in most areas of Region 3 is quite low and is assumed to be less than 6% of the population, which is a rate that is sustainable under most ecological circumstances. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed through changes in seasons and bag limits. The presence or absence of tag fees does not appear to have a significant influence on harvest in these areas.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-020)

Proposal 86

5 AAC 92.XXX. New Regulation.

Add a new section to 5 AAC 92 regarding consideration of environmental change in game management decisions as follows:

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

Add a new section as follows

5 AAC 92 XXX Consideration of environmental change in game management decisions

When evaluating proposals and adopting regulations for Game Management Units 22, 23, 24, 25, and 26, the Board shall consider the best available scientific information regarding long term environmental change, including the role of anthropogenic climate change, and its effects on wildlife populations, habitat, and sustained yield.

The Board shall include in its findings a brief statement describing how these factors were considered.

In making decisions, the Board shall recognize that long term environmental change may alter habitat capacity and population dynamics such that some populations may not return to historical levels.

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

This regulatory cycle is focused on Arctic and northern Alaska, where the effects of environmental change are among the most pronounced in the state. However, the Board of Game is not explicitly required to consider long term environmental change, including the role of human caused climate change, when making wildlife management decisions in these regions.

A growing body of Alaska based research and Alaska Department of Fish and Game reporting demonstrates that long term environmental change is affecting game populations, particularly Dall sheep and caribou. Recent Board of Game materials document substantial and widespread declines in Dall sheep populations across multiple regions, including declines of approximately 40 to 70 percent in several mountain ranges.

Current research presented to the Board indicates that population trends are strongly influenced by environmental conditions affecting nutrition, pregnancy rates, and lamb survival. Changing weather patterns, including increased frequency of severe winter events, altered snow conditions, and habitat shifts such as shrub encroachment into alpine areas, are identified as key drivers.

Wildlife populations in Alaska have historically exhibited natural fluctuations, and climate variability has always been a factor in northern ecosystems. However, current data presented to the Board indicate a different pattern with more frequent and repeated environmental stressors occurring across multiple regions at the same time.

Similarly, while climate variability includes natural cycles, the scale, rate, and consistency of observed environmental changes in Arctic regions are not well explained by cyclical patterns alone. The available evidence indicates a shift in underlying baseline conditions, with population trajectories increasingly shaped by persistent environmental change rather than periodic variation.

Across northern Alaska and adjacent regions of Canada, some of the continent's largest remaining caribou herds and mountain sheep populations are experiencing synchronous declines, further suggesting broad scale environmental drivers.

In many areas, populations are likely to persist at lower densities rather than return to historical levels.

If the Board does not explicitly consider these factors, management decisions may continue to rely on assumptions of recovery based on cyclical patterns that may no longer apply, particularly in Arctic regions where these effects are magnified. This creates risk to sustained yield and long term hunting opportunity.

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

This proposal was developed independently, informed by publicly available Alaska Department of Fish and Game materials and current scientific literature on wildlife population dynamics in Alaska and northern North America.

PROPOSED BY: Paul Forward

(OI-F26-127)

**Amendments may be required to remain consistent with statutory authority.*

Proposal 87

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd as follows:

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

Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd to read:

Notwithstanding any other provision of this section, when the Western Arctic Caribou Herd population has declined to 75,000 animals or fewer, the hunting season for caribou from the Western Arctic Herd shall be closed in Units 22, 23, 24B remainder, 24C, 24D, 26A. The season shall remain closed until the department determines that the population exceeds 100,000 animals and that a harvestable surplus exists.

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

The Western Arctic Caribou Herd (WACH) was once the largest caribou herd in Alaska, but over the past two decades it has declined by nearly 70 percent. Without significant management intervention, the herd is expected to continue to decline. A July 2025 photo census estimated the herd at 121,000 caribou, representing an approximately 20 percent decrease since 2023.

At its annual meeting, the WACH Working Group assigned the herd a management status of “Critical, Declining,” based on the current population estimate of below 130,000 and an adult cow survival rate of less than 80 percent. Although specific management actions and harvest recommendations are associated with this status, the Working Group is proposing a hunting closure to reflect the severity of the continued population decline and support long-term recovery.

The Board of Game should establish a temporary closure of the hunting season for caribou from the Western Arctic Caribou Herd (WACH) in Units 22, 23, 24B remainder, 24C, 24D, 26A, if the herd population declines below 75,000. The season should remain closed until the WACH population exceeds 100,000.

Establishing a precautionary regulatory closure in response to the continued decline of the WACH would help prevent further reductions at critically low population levels and support the long-term sustainability of the herd.

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

This proposal was developed by the Western Arctic Caribou Herd Working Group. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

PROPOSED BY: Western Arctic Caribou Herd Working Group (OI-F26-119)

** Amendments may be required to remain consistent with statutory authority.*

Proposal 88

5 AAC 92.104. Authorization for methods and means disability exemptions.

Allow Crossbow Use in Archery-Only Hunts and Areas for Qualifying Purple Heart Veterans with Physical Challenges and Alaskan Seniors Age 62 or over as follows:

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

Amend **5 AAC 92.104 (Authorization for methods and means disability exemptions)** by adding a new subsection for automatic authorization, and make conforming changes to 5 AAC 92.085 and 5 AAC 92.530 as needed.

Proposed new language (to insert as subsection (f) or similar):

“(f) Notwithstanding other provisions of this chapter, the department shall issue a methods and means exemption authorizing the use of a crossbow in any hunt or area restricted to bow and arrow only—including the Dalton Highway Corridor Management Area under 5 AAC 92.530(7)—to an applicant who:

- (1) is an Alaska resident Purple Heart recipient and provides documentation of physical challenges (e.g., wheelchair confinement, prosthetics, or a VA-certified service-connected
- (2) disability that prevents effective use of a conventional bow); or is an Alaska resident 62 years of age or older;

and who possesses a valid ADF&G-approved crossbow education certification card. The exemption shall be issued upon one-time submission of proof of eligibility (Purple Heart/VA documentation for veterans; proof of age and residency for seniors) and shall remain valid for the life of the hunter (or five years, renewable). No physician statement is required for those meeting the above criteria. The crossbow must meet all requirements in 5 AAC 92.085(15). The department may include reasonable conditions for safety and fair chase.”

This applies **statewide**, explicitly including the DHCMA north of the Yukon River along the Trans-Alaska Pipeline corridor.

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

Current regulations prohibit crossbows in any hunt or area restricted to “bow and arrow only” (5 AAC 92.085). This includes premium archery-only hunts statewide and specific management areas such as:

- **The Dalton Highway Corridor Management Area (DHCMA)** (5 AAC 92.530(7)): Portions of Units 20 and 24–26 extending five miles from each side of the Dalton Highway (Trans-Alaska Pipeline corridor), from the Yukon River north to the Arctic Ocean. In this corridor, big game may be taken by bow and arrow only (firearms are prohibited for big game hunting within the corridor).

While disabled hunters can seek individual **Methods and Means Disability Exemptions** (5 AAC 92.104), the process is burdensome for recurring use. Purple Heart veterans confined to wheelchairs, using prosthetics, or with other service-related physical challenges often cannot effectively draw or hold a conventional bow. Alaskan seniors age 62+ face similar age-related limitations but are not automatically eligible.

These restrictions limit access for deserving Alaskans in archery-only opportunities statewide **and specifically exclude them from the DHCMA north of the Yukon River**—a unique, remote area along the pipeline corridor that offers important hunting access via the Dalton Highway. Opening this corridor (and all archery areas) to qualifying crossbow users honors veterans’ service, supports senior participation, promotes hunter retention, and maintains fair chase and conservation goals without affecting bag limits, seasons, or wildlife populations.

Why is this proposal necessary? (Rationale and benefits)

- **Equity and access:** Provides meaningful opportunity for Purple Heart veterans and seniors in archery-only hunts **and the DHCMA**, where conventional bow use may be physically impossible.
- **Targeted and limited impact:** Only a small number of qualifying hunters; crossbows must still meet strict standards (100 lb draw, etc.) and certification requirements. No change to seasons, bag limits, or overall harvest.
- **Administrative efficiency:** One-time approval vs. repeated per-hunt exemptions.
- **Precedent and fairness:** Builds on existing disabled veteran free licenses and senior programs. The DHCMA was established for access and wildlife protection—allowing crossbows for these groups aligns with that intent while removing unnecessary barriers.
- **Other solutions considered:** None. The current exemption process is too cumbersome for statewide and corridor use by clearly defined groups.

Supporting information (attach if desired):

- Your Purple Heart documentation or personal story.
- Letters from veterans’ groups, senior organizations, or local Advisory Committees.
- Current ADF&G crossbow and exemption forms.

This updated proposal ensures Purple Heart veterans with physical challenges and seniors 62+ can hunt ethically with crossbows in archery-only areas **throughout Alaska, including the important Dalton Highway/Trans-Alaska Pipeline corridor north of the Yukon River.**

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

PROPOSED BY: Daniel McDowell, The Last Frontiersman (OI-F26-027)

McGrath Area - Units 19, 21A and 21E

Proposal 89

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

Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt as follows:

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

Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt managed by the Alaska Department of Fish and Game.

Proposed regulatory language:

5 AAC 85.045. Hunting seasons and bag limits for moose. Unit 19A:

REGISTRATION HUNT: One bull moose; season dates, permit numbers, and any antler restrictions to be established by the department through permit conditions based on current population status and harvest objectives.

[UNIT 19A MOOSE HUNT MANAGED UNDER TIER II SUBSISTENCE HUNTING]

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

Moose populations in Game Management Unit 19A have increased to a level where additional harvest opportunity may be provided while continuing to meet conservation and subsistence needs. Recent post-hunting season composition surveys indicate adequate calf-to-cow ratios and continued population growth, suggesting the herd can support increased harvest. These indicators suggest that harvest levels could exceed the Amount Necessary for Subsistence (ANS) without compromising sustained yield.

Unit 19A has met or exceeded the lower bounds of the ANS for multiple consecutive years. When populations are consistently meeting or exceeding ANS thresholds, it indicates that the resource is sufficient to provide for subsistence needs without the need for Tier II allocation. Continued use of Tier II under these conditions is inconsistent with its intended purpose, which is to restrict access only when harvestable surplus is insufficient to meet demand.

During the March 2024 Board of Game meeting, the board reduced the size of Unit 19A while simultaneously increasing the ANS for the unit. During this same period, village populations in the region have declined. This creates a situation where the current ANS may no longer accurately reflect present subsistence demand on the resource.

In addition, the current Tier II structure may no longer be necessary to allocate opportunity. In practice, the number of applicants closely aligns with the number of permits issued, resulting in most or all applicants receiving permits. This calls into question the need for a Tier II system, which is intended to limit participation when demand exceeds available harvest.

If no change is made, Unit 19A will remain under a Tier II framework that may no longer reflect current biological conditions or actual subsistence demand, and may continue to unnecessarily limit participation.

This proposal seeks to align management with current population status and user demand by transitioning the Unit 19A moose hunt from Tier II subsistence to a registration hunt, while maintaining the department's ability to regulate harvest, adjust permit numbers annually, and ensure long-term sustainability.

Population and composition data supporting this proposal are summarized in Alaska Department of Fish and Game moose survey updates, including post-hunting season surveys conducted in 2024 and 2025

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

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-084)

Proposal 90

5 AAC 92.540. Controlled Use Areas.

Repeal the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Current Regulation (5 AAC 92.540(3)(B)): (3) Holitna-Hoholitna Controlled Use Area (i) the area consists of those portions of Units 19(A) and 19(B) draining into the Kuskokwim River downstream from and including the Moose Creek drainage on the north bank from and including the Stony River drainage and downstream from and including the Swift River drainage on the south bank; (ii) the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of 40 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1; however, this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.

Proposed Regulation Change: Repeal the 40 HP restriction in subparagraph (ii) so it reads: (ii) ~~the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of 40 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1; however, this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.~~ [No horsepower restriction on boat motors.]

What would be the effect if this proposal is adopted? Hunters from GMU 18 and surrounding areas would have better access to GMU 19 hunting grounds using safer, more efficient boats. This could slightly increase hunting pressure, but existing seasons, bag limits, and reporting requirements would mitigate any conservation concerns. No significant negative impact on moose, caribou, or other big game populations is expected, as the restriction was originally intended to reduce disturbance but are no longer necessary with current management tools.

Who is likely to benefit? Local residents, subsistence users, and recreational hunters in GMUs 18 and 19 who rely on river travel for access. It would promote fairness and safety.

Who is likely to suffer? Possibly non-local hunters or those preferring low-disturbance areas, but overall impacts should be minimal.

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

The 40 horsepower (HP) boat motor restriction in the Holitna-Hoholitna Controlled Use Area (CUA) within GMU 19 limits access for hunters traveling from GMU 18 via connected waterways like the Holitna and Kuskokwim rivers. This restriction, which applies to hunting big game (including transportation of hunters, gear, or parts) from August 1 to November 1, prevents the use of boats with motors over 40 HP, even when necessary for safe navigation in strong currents, shallow waters, or long-distance travel. Residents and hunters in GMU 18 rely on these rivers for access to hunting areas in GMU 19, but the HP limit increases travel time, fuel consumption, and safety risks (e.g., getting stuck or unable to handle river conditions). Removing this restriction would improve equitable access without negatively impacting wildlife populations, as modern boats are more efficient and the area already has other protections like bag limits and seasons. This change would support subsistence and recreational hunting while maintaining conservation goals.

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

Yes, Bethel Advisory Committee

PROPOSED BY: Bethel Advisory Committee

(OI-F26-054)

Proposal 91

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

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

The current regulation in the Holitna–Hoholitna Controlled Use Area limits outboard motors to 40 horsepower during the fall hunting season. While originally intended to reduce access pressure, this restriction creates practical and safety concerns for those traveling the river system.

The Holitna and Hoholitna rivers can present challenging conditions, including shallow sections, variable channels, and long travel distances. Operating with smaller motors can reduce a hunter's ability to navigate safely, especially when transporting gear or harvested game. This can lead to increased risk and reduced reliability in remote areas.

In addition, modern boat designs and common usage have shifted toward higher horsepower motors, and the current restriction does not reflect how most boats are now configured for safe operation

If the restriction remains in place, hunters will continue to face limitations that may impact safe travel and efficient retrieval of game. As equipment standards continue to evolve, the regulation may become increasingly impractical and misaligned with real-world conditions.

Removing the horsepower restriction would allow individuals to operate equipment that is better suited for current river conditions and modern boat setups. This would improve safety, reliability, and overall efficiency without eliminating other existing controls in the area.

Maintaining the aircraft restriction and other elements of the controlled use area continues to limit certain types of access, while removing the horsepower cap addresses a specific concern that no longer serves its intended purpose.

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

Family

PROPOSED BY: Kenneth Owens

(OI-F26-073)

Proposal 92

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

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

The Holitna–Hoholitna Controlled Use Area currently restricts the use of outboard motors greater than 40 horsepower for big game hunting. While intended to limit access and reduce hunting pressure, this restriction creates safety concerns and practical limitations for hunters navigating the Holitna and Hoholitna river systems.

River conditions in this area can include shallow water, strong currents, debris, and long travel distances. Limiting hunters to smaller motors can reduce maneuverability and reliability, particularly when boats are heavily loaded with gear or game meat. This may increase risk during travel and limit the ability to respond to changing river conditions.

Additionally, advances in boat and motor technology have made higher horsepower motors more common and, in many cases, necessary for safe and efficient operation. The current restriction does not reflect these changes and may place hunters using standard modern equipment at a disadvantage.

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

Family

PROPOSED BY: Edward Enoch

(OI-F26-074)

Proposal 93

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

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

The 40 horsepower motor restriction in the Holitna–Hoholitna Controlled Use Area places unnecessary limits on how people can safely travel the river system during hunting season.

The rivers in this area are long, remote, and can change quickly depending on water levels and conditions. Using a smaller motor can make travel slower and less dependable, especially when hauling gear or returning with meat. In some situations, this can create safety concerns or make it difficult to complete a trip efficiently.

Many boats in use today are designed to run with higher horsepower motors, and limiting them to 40 horsepower does not match how most people are equipped. This can make it harder for hunters to use the equipment they already have safely and effectively.

If the current restriction remains, people will continue to deal with limitations that can affect safe travel and the ability to move efficiently on the river. This may discourage use of the area or create ongoing safety concerns for those who rely on it.

Removing the horsepower limit would allow people to use appropriate equipment for the conditions without changing other existing restrictions in the area. It would improve safety and practicality while still maintaining the intent of managing access through other means already in place.

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

Friends and family

PROPOSED BY: John Wuya

(OI-F26-075)

Proposal 94

5 AAC 92.540. Controlled Use Areas.

Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP as follows:

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

Recommended solution: Increase the horsepower limit from 40 hp to 115 hp to allow safe operation with both prop and jet drives commonly used by Unit 18 hunters.

Regulatory language Draft:

5 AAC 92.540. Controlled use areas.

...

(B) the Holitna-Hoholitna Controlled Use Area:

(i) the area consists of the waters of the Holitna River downstream from Kashegeloq, the Titnuk River (Creek) downstream from Fuller Mountain and the Hoholitna River downstream from the confluence of the South Fork and main Hoholitna River;

(ii) the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of [40] 115 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through November 1; however this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.

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

The Holitna-Hoholitna Controlled Use Area in Unit 19 currently limits boat motors to 40 horsepower. This restriction creates serious safety and access problems for residents of Unit 18 who must travel long distances on the Kuskokwim River system to reach traditional hunting areas in the Holitna and Hoholitna drainages.

Hunters from Unit 18 regularly use larger motors for safe travel due to strong currents, unpredictable weather, heavy loads of gear and meat, and long round-trip distances. When switching from a propeller to a jet unit — a common practice in shallow or changing river conditions — horsepower is significantly reduced. A 40 hp limit does not provide enough power once converted to a jet, forcing underpowered boats and creating safety risks.

ADF&G already effectively manages harvest in the area through check stations in the Upper Holitna-Hoholitna Management Area, bag limits, seasons, and other tools. If nothing is changed, Unit 18 residents will continue to be practically excluded from these historically used hunting grounds, reducing equitable opportunity and food security for rural families.

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

I developed this proposal based on my direct experience as a Unit 18 hunter and discussions with other residents who travel the Kuskokwim and Holitna rivers. Many of us run propeller drives for the main river travel and then switch to jet units when river conditions change. The current 40 hp limit does not account for this common and necessary practice. I have not yet coordinated with my local Advisory Committee but plan to do so.

PROPOSED BY: Nicholas Ayapan

(OI-F26-121)

Proposal 95

5 AAC 92.540. Controlled Use Areas.

Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than 115 horsepower to take big game.

If the current restriction remains in place, users will continue to operate with limited effective power when using jet units, which are common in this type of river system. This may result in continued challenges related to safe navigation, load carrying, and travel efficiency.

Increasing the limit to **115 horsepower** accounts for the reduction in usable power when motors are equipped with jet units. This provides a more practical level of performance while still maintaining a defined upper limit on motor size.

This change would improve the ability of users to safely and effectively travel in the area without removing all restrictions on motorized access. It reflects current equipment standards and typical use patterns while maintaining a controlled approach to managing access.

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

The current 40 horsepower restriction in the Holitna–Hoholitna Controlled Use Area does not reflect how boats are commonly used on these rivers today, particularly with the widespread use of jet outboards.

Jet units significantly reduce the effective horsepower delivered to the water compared to prop-driven motors. As a result, a motor rated at 40 horsepower provides substantially less usable power when configured as a jet, which can limit maneuverability and performance in shallow, braided, and fast-moving river conditions.

Travel in the Holitna and Hoholitna systems often involves long distances, variable water levels, and heavy loads. Underpowered boats can struggle in these conditions, especially when transporting gear or harvested game. The current limit can therefore create operational challenges and reduce the margin of safety for users.

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

No

PROPOSED BY: Samuel Hancock

(OI-F26-060)

Proposal 96

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

Amend the permit conditions for RM682 to allow permit holders to also hold and use other valid moose permits in the Kuskokwim drainage as follows:

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

This change would primarily affect the special conditions for hunt RM682 under 5 AAC 85.045 (hunting seasons and bag limits for moose) and/or 5 AAC 92 (permit hunt procedures). The current restriction appears in hunt-specific details and permit issuance rules.

Current (as described in hunt info and permit conditions): If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year. [Or similar language prohibiting holding RM682 with other Kuskokwim drainage moose permits.]

Proposed Regulation Change: Amend the permit conditions for RM682 to remove the exclusion: ~~If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.~~ **Hunters who receive an RM682 permit may also hold and use other valid moose permits in the Kuskokwim drainage, subject to all other applicable regulations.**

(If a specific codification exists in 5 AAC 85.045(a)(19) or permit regs, reference it; otherwise, this targets the hunt condition directly.)

What would be the effect if this proposal is adopted? Hunters could participate in RM682 and other moose hunts in the Kuskokwim drainage (e.g., combining with permits in adjacent subunits), increasing flexibility for subsistence users and locals without significantly increasing overall harvest pressure, as reporting remains mandatory and populations are monitored.

Who is likely to benefit? Resident hunters, especially subsistence users in the Kuskokwim region and those accessing from areas like GMU 18, who face access challenges and want multiple opportunities.

Who is likely to suffer? Minimal impact: possibly slight increase in effort in some areas, but conservation tools (seasons, quotas if any, reporting) would prevent overharvest.

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

The registration moose permit RM682 in Unit 19E includes a restriction that prohibits a hunter from holding or using this permit if they hold any other moose hunting permit in the Kuskokwim drainage for the regulatory year. This excludes hunters from participating in multiple compatible moose hunts (e.g., registration or Tier II permits in adjacent or overlapping areas like other parts of the Kuskokwim drainage). For residents in or accessing via areas like GMU 18 or along the Kuskokwim River, this limits opportunities for subsistence or recreational hunting, reduces flexibility, and may create unnecessary barriers without clear conservation benefits. Removing this exclusion would allow hunters to hold RM682 alongside other valid moose permits in the drainage, promoting equitable access while existing harvest reporting, seasons, and bag limits continue to manage populations sustainably

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

Bethel Advisory Committee

PROPOSED BY: Bethel Advisory Committee

(OI-F26-055)

Proposal 97

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

Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage as follows:

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

Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage. This modest change gives hunters needed flexibility while keeping all hunt-specific seasons, bag limits, and reporting requirements in place.

Regulatory language draft:

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

...

For the RM682 registration moose hunt in Unit 19E remainder:

Current language: If you receive a RM682 permit you [CANNOT] receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.

Proposed language: If you receive a RM682 permit you MAY receive and hunt under another permit to hunt moose in the Kuskokwim drainage this regulatory year. This includes permits such as RM615 and others.

Hunters who receive an RM682 permit may also hold and use other valid moose permits in the Kuskokwim drainage, subject to all other applicable regulations. All hunt-specific seasons, bag limits (one antlered bull), and reporting requirements remain in effect.

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

The RM682 registration moose permit for Unit 19E remainder currently states: “If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.” This restriction forces residents of Unit 18 and other Kuskokwim communities to choose between the short early-season RM682 hunt and other important moose hunting opportunities, such as registration hunts in Unit 18 (e.g., RM615).

This “one-tag-only” rule is overly restrictive for rural hunters who rely on multiple flexible opportunities for food security. RM682 is a limited, short-duration registration hunt with low harvest pressure. ADF&G already controls overall moose harvest through permit quotas, season length, bag limits, and reporting requirements. If nothing changes, hunters who obtain RM682 will continue to lose access to other compatible Kuskokwim moose hunts, reducing opportunity without clear conservation benefits.

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

This proposal is based on my personal experience hunting moose on the Kuskokwim River areas as a Unit 18 resident. Along with other rural Kuskokwim residents. The current restriction creates unnecessary hardship when trying to plan hunts across multiple registration opportunities.

PROPOSED BY: Nicholas Ayapan (OI-F26-122)

Proposal 98

5 AAC 92.123. Intensive Management Plans VII.

Reauthorize the Unit 19D East Intensive Management predation control program as follows:

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

5 AAC 92.123(c). Unit 19(D)-East Predation Control Area.

(c) Unit 19(D)-East Predation Control Area: the Unit 19(D)-East Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage, but excluding the Black River drainage, encompassing approximately 8,513 square miles; this predation control program does not apply to any National Park Service or National Wildlife Refuge lands unless approved by the federal

agencies; notwithstanding any other provisions in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf and a black bear and a brown bear population reduction or a wolf and a black bear and a brown bear population regulation program in Unit 19(D)-East to benefit moose:

(1) the following Wolf and Bear Control Focus Areas are established in the Unit 19(D)-East Predation Control Area; the areas do not delineate a moose, wolf, or bear population and are not intended to distinguish animals within the focus areas from populations in Unit 19(D)-East; the purpose is to focus wolf and bear control in a relatively small area where moose numbers can be better estimated, where moose are accessible to hunters, and where harvest can be closely monitored;

(A) the Wolf Control Focus Area (WCFA) encompasses approximately 5,579 square miles within that portion of Unit 19(D) upstream of the Selatna River drainage, but excluding the Black River drainage, and downstream of, but not including Fourth of July Creek, the Swift Fork, or the Slow Fork and Tonzona River drainages east of 153° 10.00' W. long.; wolf control will be conducted only within the WCFA; the department will have the discretion to adjust the WCFA's size and shape to include up to approximately 6,000 square miles of Unit 19(D)-East;

(B) the Black Bear and Brown Bear Predation Control Focus Area (BCFA) encompasses approximately 528 square miles consisting of those portions of the Kuskokwim River drainage enclosed by a line starting at a point northwest of McGrath at 63° 04.00' N. lat., 155° 50.00' W. long., then east to 63° 04.00' N. lat., 154° 50.00' W. long., then south to 62° 54.00' N. lat., 154° 50.00' W. long., then west to 62° 54.00' N. lat., 155° 25.00' W. long., then south to 62° 50.00' N. lat., 155° 25.00' W. long., then west to 62° 50.00' N. lat., 155° 30.00' W. long., then south to 62° 48.00' N. lat., 155° 30.00' W. long., then west to 62° 48.00' N. lat., 155° 35.00' W. long., then south to 62° 42.00' N. lat., 155° 35.00' W. long., then west to 62° 42.00' N. lat., 155° 55.00' W. long., then north to 62° 50.00' N. lat., 155° 55.00' W. long., then east to 62° 50.00' N. lat., 155° 50.00' W. long., then north to the point of beginning at 63° 04.00' N. lat., 155° 50.00' W. long., surrounding the village of McGrath; bear control will be conducted only within the BCFA; the department will have the discretion to adjust the BCFA's size and shape up to approximately 680 square miles of Unit 19(D)-East; the BCFA is within the WCFA;

(2) this is a continuing control program that was first authorized by the board in 1995; wolf control began in winter 2003 - 2004 and bear control began with nonlethal removal of bears in the BCFA during May 2003 and May 2004; the control program is currently designed to increase moose numbers and harvest in the WCFA and BCFA by reducing predation on moose and is expected to make a contribution to achieving the intensive management (IM) objectives in Unit 19(D)-East;

(3) moose, wolf, black bear, and brown bear objectives are as follows:

(A) moose IM objectives established by the board for Unit 19(D)-East are for a population of 6,000 - 8,000 moose and an annual harvest of 400 - 600 moose;

(B) the **population** [DENSITY] objective for moose in the WCFA is **5,600 moose** [1.0 MOOSE PER SQUARE MILE] (corrected for sightability) in fall **or late winter** surveys; **the population objective for moose in the BCFA is 1,050 moose (corrected for sightability) in fall or late winter surveys;** the annual harvest objective for the WCFA is **140** [225] moose;

(C) the wolf control objective in the WCFA is to reduce wolf numbers **to the lowest level possible** [BY AT LEAST 60 - 80 PERCENT]; the pre-control wolf population in Unit 19(D)-East was estimated in February 2001 at 198 wolves; the 2001 pre-control estimate within the WCFA **was** [IS] 130 wolves; only removing wolves from the WCFA will ensure that wolves persist in Unit 19(D)-East.

(D) the black bear control objective in the BCFA is to reduce black bear numbers to the lowest level possible; the pre-control black bear population in Unit 19(D)-East was estimated at 1,700 black bears; the pre-control black bear population estimate within the BCFA was approximately 130 black bears; because the BCFA is a relatively small geographic area, removing black bears from within the BCFA will have only a minor effect on the black bear population in Unit 19(D)-East;

(E) the brown bear control objective in the BCFA is to reduce brown bear numbers to the lowest level possible; the pre-control brown bear population in Unit 19(D)-East was estimated at 128 brown bears; the pre-control brown bear population estimate within the BCFA was nine; because the BCFA is a relatively small geographic area, removing brown bears from within the BCFA will have only a minor effect on the brown bear population in Unit 19(D)-East;

(4) board findings concerning populations and human use are as follows:

(A) the Unit 19(D)-East moose **population and harvest objectives have** [HARVEST OBJECTIVE HAS] not been achieved;

(B) the [WCFA OBJECTIVE FOR MOOSE HARVEST HAS NOT BEEN ACHIEVED;] **moose population in the WCFA and BCFA are currently below objective and harvest in the WCFA is currently below objective;**

(C) predation by wolves and bears is an important cause of the failure to achieve **population and** harvest objectives;

(D) a reduction of wolf and bear predation within the WCFA and BCFA can reasonably be expected to make progress towards achieving the Unit 19(D)-East intensive management objectives;

(E) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(F) reducing predation is likely to be effective given land ownership patterns;

(G) Unit 19D-East is recognized under the state's intensive management law as an area where moose are to be managed for high levels of harvest for human consumptive use; reducing predation is in the best interest of subsistence users; the area has long been an important hunting area for subsistence by local area residents as well as other Alaska residents;

(5) if the moose population in the WCFA and BCFA, and harvest objectives in the WCFA are not met and two-year average twinning rates are above 20 percent, authorized methods and means are as follows:

(A) hunting and trapping of wolves and hunting of black bears and brown bears by the public in Unit 19(D)-East during the term of this program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles;

(B) notwithstanding any other provisions in this title, the commissioner may allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783;

(C) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits using fixed-wing aircraft as a method of wolf removal under AS 16.05.783;

(6) time frame is as follows:

(A) before July 1, **2033** [2030], the commissioner may authorize removal of wolves and black bears and brown bears in Unit 19(D)-East;

(B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose, wolf, and bear populations, and recommendations for changes, if necessary to achieve the objectives of the plan;

(7) the commissioner will review, modify, or suspend program activities when:

(A) the moose **population in the WCFA or BCFA, or harvest objectives in the WCFA are achieved;** [DENSITY AND HARVEST OBJECTIVES SPECIFIED IN THIS SUBSECTION ARE ACHIEVED WITHIN THE WCFA;]

(B) any measure consistent with signs of nutritional stress in the moose population are identified.

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

The 19D-East Predation Control Plan was initially authorized in 1995. However, the predation control program did not begin until December 2003. The Board of Game (board) authorized the

current plan in March 2020, reauthorized it in March 2024, and it expires June 30, 2030. The current plan has not been updated since 2020 and this proposal seeks to evaluate the current objectives, including program-specific harvest objectives, population objectives, and predator removal objectives. If approved by the board, this plan will remain in place from July 1, 2027 through June 30, 2033.

Both department and public periods of bear removal, a 23-year wolf removal program and a large wildfire have occurred since the program was implemented confounding the department's ability to assess the program's efficacy. Moose abundance increased from 2003 through 2022. However, following an exceptionally deep snow winter (2022/2023) the moose population declined to 2012 levels.

The current program objectives include achieving a moose abundance of 1.0 moose/mi² and a harvest objective of 225 moose, both measured at the scale of the Wolf Control Focus Area (WCFA). While moose harvest from the WCFA is assessed annually, geospatial population estimate (GSPE) surveys for moose are conducted in a 1,118 mi² area surrounding the Bear Control Focus Area (BCFA). The department conducted these surveys as part of an ongoing research program, but they precluded more frequent surveys of the WCFA, which has not been surveyed since 2017. Within the WCFA, moose densities approximately doubled from 2001 (0.5 moose/mi²) to 2017 (1.1 moose/mi²), briefly exceeding the IM density objective of 1.0 moose/mi². While the WCFA has not been surveyed since 2017, a 2023 GSPE survey in the 1,118 mi² survey area surrounding the BCFA showed a decline of approximately 36% to 1.4 moose/mi², after reaching a high of 2.1 moose/mi² in 2017. If the WCFA moose density declined at a similar rate, the moose population there would now be below the density objective for the WCFA. The harvest objective of 225 moose has not been met to date. However, with the limited access in Unit 19D East, it is unlikely a harvest of 225 moose can be achieved.

Wolf removal objectives in this program have been tied to a pre-control abundance estimate of 198 wolves (23 wolves/1000mi²) in 2001 in Unit 19D East. Using this density, the department estimated there were 130 wolves, pre-control, in the current WCFA (5,579 mi²). Only public aerial wolf removals have been conducted and most wolves are removed in February-March, with highly variable removal rates. The population has been able to sustain removals of 14-73 wolves and maintain an average fall population of 54 wolves. In the last decade, fall wolf abundance estimates have been among the highest recorded by the department during the program, similar to those recorded in the mid-1990s, but likely low compared to the current prey base. Total wolf removals in the last decade have also been among the highest recorded in the program, suggesting the sustainability of the wolf removal levels.

Moving forward, the WCFA will be the primary focus for abundance estimates for moose, with a secondary objective based on the BCFA. The department is reducing the moose harvest objectives within the WCFA to more closely reflect demonstrated historical levels of harvest, and to reflect what is achievable in areas that are accessible to hunters (i.e. river corridors and the limited road systems).

This proposal retains the option of both public- and department-conducted wolf removals, and department-conducted bear removals. The department will issue public aerial permits as long as the moose population is below the stated population and harvest objectives, and the department has no indications of nutritional stress in moose. Removing bears only from the BCFA, and wolves only from the WCFA will ensure predator populations persist in Unit 19D East.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-026)

Proposal 99

5 AAC 92.540. Controlled Use Areas.

Update Upper Kuskokwim Controlled Use Area (UKCUA) transportation of moose hunters, their gear, and parts of moose dates from Sept 1-25 to Sep 1-30 to align with current hunting season as follows:

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

(7) Unit 19:

(A) the Upper Kuskokwim Controlled Use Area:

(i) the area consists of that portion of Unit 19(D) extending two miles on either side of, and including the Kuskokwim River, upstream from the mouth of the Black River to the mouth of the Swift Fork, extending two miles on either side of, and including, the Takotna River, upstream from the mouth of the Takotna River to Takotna, and extending two miles on either side of, and including, the South Fork River, upstream from the mouth of the South Fork to Nikolai;

(ii) 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 during open moose hunting seasons [FROM SEPTEMBER 1 THROUGH SEPTEMBER 25]; 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 including McGrath, Medfra, Nikolai, and Takotna, or the transportation into the area of game meat that has been processed for human consumption;

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

The Upper Kuskokwim Controlled Use Area (UKCUA) prohibits the transportation of moose hunters, their gear, and parts of moose from Sept 1-25. Prior to RY17 this prohibition was in place all year long, but publicly owned airports were excluded. In March 2017 the board passed proposal 81 which specifically named the publicly owned airports within the UKCUA (McGrath, Medfra, Nikolai, and Takotna) and also limited the UKCUA prohibitions to September 1-25. In March 2024, the board passed proposal 66 which lengthened the moose hunting season to September 30th. However, no changes were made to the UKCUA prohibition dates and the moose hunting season dates and the UKCUA dates are now out of alignment. This housekeeping proposal would realign the dates.

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

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-175)

Proposal 100

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

Make the RM650 permit available online as follows:

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

By having the RM650 permit available online, the hunters from Lower Kuskokwim River will have the ability to attain the permit with-in the current dates that are posted in the hunting regulations for this hunt. This will also save the Hunters / Subsistence users money to purchase fuel for their up-coming hunt instead of having to make two trips up to McGrath to attain the RM650 Permit. The Board of Game can Limit the number of permits to be issued online.

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

Make the RM650 Registration Permit available online.

With having the RM650 Registration permit only available in person in set area McGrath, Nikolai and Takotna, it is harder for people that are from the lower Kuskokwim River to get the RM650 Permit. By having the hunter show up in person and the possibility of the hunter having to come back up river less than 30 days later, that will put an impact on being able to purchase fuel for their future hunt. Price of fuel and hunting related items has gone up over the past few years. Just recently the Board of Game has made the RM682 Permit available online with only a certain amount to obtained online.

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

The Bethel AC is in favor of having the RM650 Permit Available online to help out future hunters / subsistence users on the Kuskokwim River

PROPOSED BY: Bethel Advisory Committee (OI-F26-069)

Proposal 101

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

Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only as follows:

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

Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only.

Unit 19D, remainder (between and including the Cheeneetnuk and Kogrukluk River drainages, excluding within 2 miles of the Swift River):

Residents and nonresidents: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side; HT; Sept. 1–Sept. 20.

Residents and nonresidents: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side; by bow and arrow only; certified bowhunters using traditional longbows and recurve bows only; HT; Sept. 21–Sept. 25.

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

Moose hunting opportunity in Unit 19D is limited by the current season length. extending the season by five days under a highly selective method of take would provide additional time afield while maintaining negligible impact on overall harvest.

Extending opportunity in this manner would also help distribute hunter effort over a longer period, reducing crowding and competition during the existing general season. Spreading out hunter participation can improve overall hunt quality and reduce user conflicts without increasing pressure on the resource.

Warmer early-season conditions in recent years have increasingly created challenges for meat care and spoilage prevention. Providing a later opportunity under a highly selective method of take would allow harvest to occur under more favorable conditions, supporting proper meat care and reducing waste.

Restricting this extension to traditional longbows and recurve bows ensures that any additional harvest remains minimal. The effective range and difficulty associated with traditional equipment inherently limit success rates, resulting in low overall harvest even with increased opportunity.

This approach is not new. Multiple states (Oregon, Utah, Oklahoma, etc) have implemented traditional archery opportunities to increase time afield while maintaining low harvest levels. These seasons have proven effective at expanding opportunity without negatively affecting game populations.

There is also a substantial segment of the hunting community that actively seeks out more challenging methods of take. Traditional archery participation is not limited to a small niche;

many hunters are willing to accept lower success rates in exchange for a more challenging and deliberate hunting experience. Providing this opportunity aligns with that demand while maintaining conservative harvest levels.

If no change is made, opportunity remains limited despite the availability of a management tool that can increase participation without increasing harvest pressure.

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

Members and Board of Directors of Compton Traditional Bowhunters

PROPOSED BY: Compton Traditional Bowhunters (OI-F26-124)

Proposal 102

5 AAC 85.045(a)(17)(B). Hunting seasons and bag limits for moose.

Reauthorize a fall antlerless hunt during September and a winter any-moose season during February in a portion of Unit 19D as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		
...		
Unit 19(D), that portion of the Black River drainage within 2 miles of the Kuskokwim River and that portion of the Selatna River drainage north of the Selatna River within 2 miles of the Kuskokwim River		
...		
1 antlerless moose by drawing permit only; up to 20 cows may be taken	Sept. 1 – Sept. 30 (General hunt only)	No open season

Unit 19(D), that portion 2 miles on either side of the Kuskokwim River from the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim River, and 2 miles on either side of the South Fork of the Kuskokwim River from the mouth to Nikolai, and 2 miles on either side of the Takotna River from the mouth to the bridge at Takotna, excluding the Black River drainage and the Selatna River drainage

...

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
1 antlerless moose by drawing permit only; up to 20 cows may be taken; or	Sept. 1 – Sept. 30 (General hunt only)	No open season
1 moose by registration permit only; a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season

Unit 19(D), that portion of the Black River drainage excluding that portion within 2 miles of the Kuskokwim River, and that portion of the Selatna River drainage north of the Selatna River, and excluding that portion with 2 miles of the Kuskokwim River

...

Sept. 1 – Sept. 30 (General hunt only)	No open season
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1 antlerless moose by drawing permit only; up to 20 cows may be taken

Unit 19(D) Remainder

...

Sept. 1 – Sept. 30
(General hunt only)

No open season

1 antlerless moose by drawing permit only; up to 20 cows may be taken; or

Feb. 1 – Last day of Feb.

No open season

1 moose by registration permit only;
a person may not take a cow accompanied by a calf

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game (board).

The moose population in Unit 19D upstream of the Selatna River recently experienced a significant decline due to the extremely difficult winter of 2022–2023. During a November 2023 geospatial population estimate (GSPE), the department documented a decline from 2,471 moose (2.2 moose/mi²) to 1,591 moose (1.4 moose/mi²). Due to this decline, the department closed the winter hunt in regulatory year (RY) 23 by emergency order. In March 2024, the board adopted Proposal 66, which was submitted by the McGrath Advisory Committee (AC) prior to the documented decline, and authorized a new drawing permit hunt in the fall for cows in a portion of Unit 19D. Both hunts were reauthorized by the board in March 2026 with unanimous support from the McGrath AC. To allow the moose population to recover from the 2022–2023 winter decline, the department did not implement any antlerless hunts during RY24 and RY25. While the department does not intend to issue antlerless permits in RY27, the department would like to keep the hunt available as a tool to provide additional opportunity when it is again warranted.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-013)

Proposal 103

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system as follows:

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

Change the current 19C Dall Sheep hunting regulations as follows:

-Residents: One ram with full-curl horn or larger, RSXXX, [NO OPEN SEASON], Aug 10-Sept 20

Registration permit for residents, capped at (15) rams taken by full-curl horn or larger, broomed or broken on both sides or 8 years old or larger.

-Non-Residents: One ram with full-curl horn or larger, DSXXX, [NO OPEN SEASON], Aug 10-Sept 20

Drawing permit for non-residents and 2DK, capped at (5) total draw permits with up to (1) draw permit allocated to 2DK

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

The Matanuska Valley Advisory Committee would like to see a change to the current regulations for Dall Sheep in unit 19C to allow for a registration permit hunt for residents. Due to no biological concerns with full-curl management implementation, coupled with a conservatively capped registration permit, opportunity to hunt 19C would be granted to all resident sheep hunters. The Matanuska Valley Advisory Committee has always supported resident hunting opportunity, and this would allow for a hunting opportunity to resume after the recent closure to both residents and non-residents. We would ask for a (7) day reporting period for the registration permit, giving time for hunters to leave the field and promptly report whether successful or unsuccessful.

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

PROPOSED BY: Matanuska Valley Fish & Game Advisory Committee (OI-F26-149)

Proposal 104

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system as follows:

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

A general sheep season for residents in Unit 19C should again be allowed. There is a harvestable surplus of rams in Unit 19C for a general season resident sheep hunt according to the Department, which poses no sheep conservation concerns at this time. Nonresident sheep hunting should be draw-permit only with a limited allocation.

Unit 19C Sheep

Residents: One ram with full-curl horn or larger by Harvest Ticket Aug 10 – Sept 20

Nonresidents: One ram with full-curl horn or larger every four regulatory years by draw permit Aug 10 – Sept 20 (up-to 10 permits) until a Guide Concession Program is implemented

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

LOSS OF RESIDENT SHEEP HUNTING OPPORTUNITY IN UNIT 19C

At the March, 2025, Statewide Board of Game Meeting, when the board was deliberating Proposal 190 that would shut down resident sheep hunting opportunity in Unit 19C for the 2025 fall season and in 2026 put resident and nonresident sheep hunters on a draw permit system, the Alaska Department of Fish and Game (Department) told the board that there was a harvestable surplus of sheep in Unit 19C for residents under a general season hunt, and that they had no conservation concerns over continued resident general sheep hunting opportunity in the unit, even though the sheep population was in decline..

The board had already closed Unit 19C in 2023 to all nonresident sheep hunting opportunity due to conservation concerns that arose after the board allowed unlimited nonresident sheep hunting opportunity that resulted in nonresident guided hunters taking 90 percent of the sheep harvest in 2022 from the declining sheep population.

At that time, and previously, the board stated that the problem was “too many guides” in the unit, not their allowance of unlimited sheep hunting opportunity for nonresidents who are required to hire a guide. Whether the problem was too many guides, or too many nonresident sheep hunters, the board’s conservation concerns related to what they believed was an overharvest of sheep in Unit 19C by nonresident guided hunters. Resident sheep hunters never posed a sheep conservation concern.

The board’s decision in 2025 to shut down the resident sheep season in 19C, and make it a draw hunt for both residents and nonresidents starting in 2026, had a caveat that general sheep hunting opportunity in 19C for residents and nonresidents would only be allowed in the future if there were limits on guides via a Guide Concession Program (GCP) the legislature authorized

during the 2025 session (SB 73) which could be implemented as a test program in a unit of the board's choosing

Why are resident sheep hunters bearing the burden of this closure and subsequent draw hunts when the Department says there are no sheep conservation concerns with continued resident general sheep hunting opportunity, and the board has determined that the problem was too many guides? Why is resident general sheep hunting opportunity in the future dependent on limiting guides? What the board is really alluding is that if guides are not limited in 19C there will continue to be an overharvest of sheep from a declining sheep population by nonresident guided hunters.

The only sheep hunters in Unit 19C that need to be on a draw permit system before guides are limited are nonresidents.

Unit 19C Guide Concession Program & Timeline

The board passed a proposal in March of 2025 that would implement a GCP in Unit 19C, however, the Department of Law stated that the way the board adopted that proposal was not legal, and a new proposal must come forth in 2027 to designate Unit 19C as the first area where a test GCP will be implemented.

The Department of Natural Resources (DNR) has hired one additional employee for the GCP but the Department has not received the funds allocated by SB 73 to hire additional staff deemed necessary for their role in the GCP. Realistically, we are likely looking at a minimum of three years from the time the board passes a GCP proposal in 2027 before the program would be in place and implemented.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-162)

Proposal 105

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, but keep nonresidents on a draw permit system with limited allocation until a GCP is implemented as follows:

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

Re-open Unit 19C to resident general sheep hunting opportunity

Keep nonresidents on a draw permit system with limited allocation until a GCP is implemented

Unit 19C Sheep Residents

Aug 10 – Sept 20

One ram with full-curl horn or larger (OTC permit)

Unit 19C Sheep Nonresidents Aug 10 – Sept 20

One ram with full-curl horn or larger every four regulatory years by draw permit only Up to 4 permits

When/if a Guide Concession Program is implemented in Unit 19C, nonresident sheep hunters will go off draw permit and be able to hunt under an OTC permit.

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

Sheep Declines in Unit 19C, Resident Loss of Opportunity, Guide Concession Program

For several cycles, Resident Hunters of Alaska (RHAK) submitted proposals to limit nonresident sheep hunters in Unit 19C due to high nonresident harvest rates, a declining sheep population, and fears that residents would lose sheep hunting opportunity if the board did not limit nonresident sheep hunters.

Every one of our proposals was voted down, with the board using the rationale that under full-curl harvest management, there were no conservation concerns (even with low sheep numbers) with continued unlimited nonresident sheep hunting opportunity. The board admitted all along that there were problems, but they said the problems stemmed from unlimited guides in the unit, not the unlimited opportunity they gave to nonresident sheep hunters who must be guided.

This entire decade and more of us submitting proposals and them being voted down, only for the board to eventually say there were sheep conservation concerns in Unit 19C due to no limits on guides (i.e. unlimited nonresident opportunity) has been disheartening to say the least.

Resident sheep hunters are now on a draw system for Unit 19C sheep, with 16 permits being issued. Residents *did* end up losing sheep hunting opportunity, just like we feared due to inaction by the board to limit the nonresident component.

Residents will not gain general season OTC opportunity again until a Guide Concession Program (GCP) is implemented. The board has not even chosen an area yet for the initial experimental GCP that can only be implemented in one Unit. ADFG does not have the funding for their role in a GCP. The Department of Natural Resources (DNR) has hired one person for their role in the GCP but they have told us that the earliest they see a GCP being implemented is at least 3 years out from the time the board chooses an area.

This whole thing is flat-out ridiculous that the board would allow unlimited nonresident sheep hunting opportunity in an area they knew had drastic sheep declines and allow nonresidents to

harvest 90 percent of the sheep the last year it was open to everyone. Resident sheep hunters should not have to bear the burden of lost opportunity when all along they were not a part of the problem.

Tying resident opportunity to a program to limit guides is also just ridiculous. What do guides have to do with resident sheep hunting opportunity? Why does no limits on guides lead to a resident sheep hunting closure? It's the board's job to use their authority to fix problems, not delay for over a decade when they could have fixed the problem all along by limiting nonresident sheep hunters, which in turn limits the number of guides.

The reason we are here now with Unit 19C being a draw-only hunt for residents until a GCP is implemented in the unit is because the board had a preferred option that was best for the guide industry. They chose that option and delayed acting for over a decade, rather than doing what was best for the sheep and resident sheep hunters all along.

Residents should be allowed general season OTC sheep hunting opportunity in Unit 19C again. ***Resident sheep hunters should not have to wait until guides in the unit are limited to hunt again under a general season.***

The board's rationale on this matter makes no sense when you really think about it. "We can't let residents hunt sheep under a general season because there are too many guides." "Too many sheep will be taken if we don't limit guides."

What kind of state do we live in whereby guides and the guide industry can negatively affect resident sheep hunting opportunity? To say we are disappointed is a gross understatement. We are angry! This kind of thing should never be allowed to happen! No other state would allow it to happen except Alaska, where we cater to the guide industry in ways that make no sense. It is not the board's job to provide stability to the guide industry!

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-138)

Proposal 106

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute as follows:

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

Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute. With 95% of the state on full curl management regardless of population numbers why is 19C the exception?

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

Restore the previous BIOLOGICALLY proven management strategy of full curl, 8 year old or double broken to a harvest ticket status. I believe that the previous decision made in 2023 was emotionally driven and not science based. The ADF&G Biologist stated that they did not recommend a closure or a drawing hunt. There was no biological evidence that this was needed, sheep populations ebb & flow with nature and are just currently in a down cycle.

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

I have been very active in talking with local biologists & staying up to date of count survey data. The last two years have shown the sheep on the upward trend & if weather allows should continue to replenish the overall population. This should show no biological conflict to open the season back to over the counter harvest status.

PROPOSED BY: Anthony Marchini

(OI-F26-137)

Proposal 107

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters as follows:

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

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.

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

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.

The BOG action banning nonresident Dall ram hunting in Unit 19C and subsequent drawing permit season should be rescinded.

Reopen seasons for resident and non-resident hunter for 1 full curl or 8 years of age or both horns broken. This is based on biology.

I quote Dr. Wayne Heimer, recognized as one of the premier Thin Horn Sheep biologists in North America in his previous proposal which clearly addressed the issues which have not changed:

Begin Dr. Heimer Quote:

"I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

BIOLOGY AND MANAGEMENT:

- 1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today's declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.*
- 2. This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.*
- 3. Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.*
- 4. The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.*

PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)

- 1. The apparent declines in Dall sheep populations have lead to the intuitive assumption that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.*
- 2. Sufficient concern over these intuitive assumptions was expressed to the Board of Game that it requested an informational meeting with Alaska's Dall sheep biologists and managers about the status of Dall sheep research and management last October. a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner's Office through the Department of Fish and Game. According to the established statutes, the Commissioner's Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.*

3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.
4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.
5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.
6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board-generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.
7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted. a. At this time, the total input from the “generating board” is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.
8. Subsequently, the board met in mid March to consider the board-generated proposal to close all Dall sheep in Unit 19C for five years.
9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass. a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim. i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK’s request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.
10. In an apparent effort to garner more board support (votes) for the (his or the Board’s?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting. a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.
11. The board approved the amendment, and moved to consider the amended proposal.
12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.
13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote margin. a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.

14. As things stand at present, nonresident participation in mature Dall ram harvesting is scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt are still allowed by regulation.”

PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,

“... the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner’s Office.

a. Alaska law (AS 16. ARTICLE 1. Sec. 16.05.010.

Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME) says “The commissioner is the principle executive officer of the Department of Fish and Game.” 2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the. . . game resources of the state in the interest of the economy and general well-being of the state.” a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner’s obligation and authority to manage in the best interests of Alaska’s economy. 1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.

2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”

a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.

b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.

3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says:

“ . . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”

a. If use isn’t maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident-free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

Wayne Heimer (EG-F23-266)” End Dr. Heimer Quote.

Hunting is a very emotionally charged and competitive topic. I am emotionally invested as anyone. However, emotion must not be allowed replace sound biological evidence. Biology does NOT support the closure or drawing permits for Dall Sheep in unit 19C.

Hunters have lost the use of a resource due to an unfounded BOG decision on an emotionally charged perception.

Mandatory education videos need to be required for licensing, like the Goat and Moose judging courses to aid in identifying legal and older animals. Helping to assure taking of old legal rams.

As a nearly lifelong Alaskan, I started hunting sheep 42 years ago in 19C. I have seen the ups and downs in population and the numbers of hunters in the field. The Alaska Range is my home. The last thing I want is to see our Dall sheep herd compromised. There is no data that supports a closure or draw in 19C. I believe we should manage our resources based on biology.

Rescind the closure and subsequent draw.

Sincerely,

Jeff Pralle

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

PROPOSED BY: Jeff Pralle

(OI-F26-172)

Proposal 108

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Return GMU 19C Dall Sheep season to historic season dates as follows:

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

GMU 19C Dall’s Sheep Season. Aug 10 – Sept. 20, 2027. Residents and Non-Residents. One Full Curl Ram.

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

GMU 19C Dall's Sheep Season. Return it to historic season dates. All the time, expense, effort, and restrictions implemented since 2023 have not, and will not, put more sheep on the mountain.

Out of Cycle BOG Proposal 204 passed in March of 2023 after the same proposal had failed by a wide margin at the previous regularly scheduled Interior Cycle BOG meeting. There was a significant level of emotion which trumped proven science, leading to the passage of Proposal 204 at the out of cycle meeting held on the Kenai Peninsula. The Alaska Board of Game process represents the most democratic process of wildlife conservation in the world and Alaskans need to be able to believe in and trust the Board process to make scientific and constitutional based decisions.

The ensuing developments since have put proven science aside and pitted user groups against user groups in the drawn-out fight for who will and will not hunt Dall's sheep in GMU 19C.

As a conservationist, hunter, and professional guide, having spent nearly 3,000 days of the past 45 years of my life living with and documenting Dall's sheep populations in GMU 19C, I have seen nearly identical population swings over the years, due to hard winters and predator abundances. These cycles are normal and will continue to occur.

Full curl management of wild sheep naturally protects recruitment. Recruitment and genetics are both provided for by the sub-legal ram population.

Hunting within a full-curl management strategy does not affect recruitment.

As well, harvest and sealing records for 19C prior to 2023 clearly indicate that rams exceeding eight years of life were not being harvested annually.

Professional guides and resident hunters can easily determine harvest potential by paying attention to annual harvest reports, weather reports, sheep hunting media, and plan their outings accordingly.

Board of Game actions to manage predation at lower levels will do more than any other factor to help maintain sustained yield, abundance, and maximum benefit objectives. Then, when hard winters do occur, the populations are not already in low density equilibriums which require longer periods of time to naturally rebuild.

Most Alaskans love our wolves, but we do not love them in numbers that hold our precious prey species in low densities which does not allow for our given habitats to be utilized.

If the BOG follows the new pattern of wild sheep management it has started within GMU 19C, the burgeoning of the process will compound around the state and the negative fight for who does and who does not hunt will continue to degenerate hunting for future generations.

You can fix this now.

Recommendations:

1. Accelerate activation of already passed predator management initiatives within GMU 19C.
2. Reauthorize over the counter Dall's sheep hunting for residents and non-residents equally.
3. Develop and encourage maximum penalty for anyone harvesting sub-legal sheep.

What would happen if nothing is changed?

People's time, state expenses will continue to be lost. The negative fight for who will or will not hunt will continue. Mature rams will continue die of old age while professional guides try to explain to their clients in the field why. Resident and non-resident hunters will continue to lose hunting opportunity.

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

This proposal and reasoning for it has been supported by numerous previously provided written and oral BOG testimonies from many people and entities including but not limited to, well known and respected Alaska wild

sheep biologists, wildlife biologists/managers, ADF&G, wild sheep support groups and related individuals, professional guides and their support groups, outdoor associations, and hunters in general.

PROPOSED BY: Robert Fithian DBA Taiga Resources Conservation (OI-F26-212)

Proposal 109

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Amend managment from full curl or larger to 3/4 curl or less for Rams in hunt DS196 as follows:

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

Residents: One ram with full-curl horn or larger – HT – August 10 – September 20
[DS196]

One ram with $\frac{3}{4}$ curl horn or less, excluding rams with both tips broken, by permit available online at hunt.alaska.gov or in person in McGrath and Nikolai beginning Sept. 29. Check in/out required due to small quota; aircraft prohibited; contact McGrath at (907)-524-3323. – RS380 – Oct. 1 – April 30.

Nonresidents: One ram with full-curl or larger every four regulatory years – HT – August 10 – September 20 [DS197 & DS198]

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

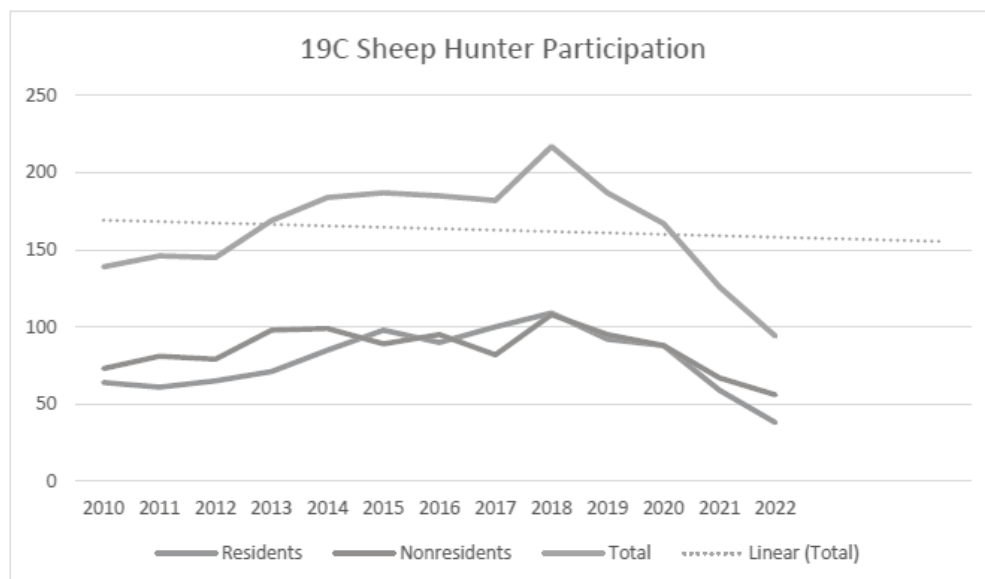
Reestablish a general season for Dall sheep in Unit 19C.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. Full-curl management is intended to preserve sheep hunting opportunity while conserving sheep. This regulation has allowed the department to have a longer hunting season and provides a chance for all to hunt a full curl ram. Full curl regulation has been the best management tool for over 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chance of survival diminishes within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams' makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Limiting harvest to full-curl rams ensures that the population's productivity is not affected by harvest.

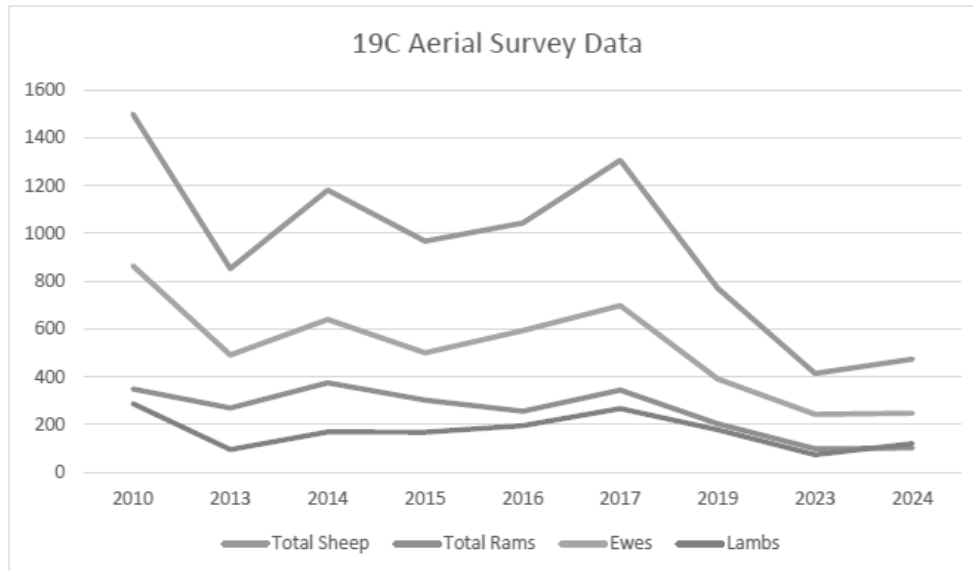
Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five-year period. Why? The short answer is self-regulation. ADF&G hunter participation records show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts on other areas of the state.

**Color Versions of the following tables can be found online at:*

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



Data pulled from ADF&G general harvest reports.



Data pulled from ADF&G Science Support Presentation to the Dall Sheep Working Group

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

No

PROPOSED BY: Jeff Rost

(OI-F26-202)

Proposal 110

5 AAC 85.055; 92.085. Hunting seasons and bag limits for Dall sheep; Unlawful methods of taking game; exceptions.

Amend regulations for sheep hunting in Unit 19C to sheep may be taken by residents and nonresidents by bow and arrow only as follows:

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

Amend regulations for sheep hunting in Unit 19C as follows:

In Unit 19C, sheep may be taken by residents and nonresidents by bow and arrow only.

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

Sheep populations in Unit 19C have declined in recent years, and the Board of Game has already taken restrictive management actions, including closure of the general season. These actions reflect concern about the sustainability of the population and the impact of harvest.

While closures and drawing permit hunts reduce harvest, they do so by substantially limiting or eliminating hunter opportunity. If the Board determines that reduced harvest is necessary, there

is an opportunity to achieve this objective through reduced harvest efficiency rather than reduced participation.

Archery hunting in alpine sheep habitat has a substantially lower success rate than rifle hunting. Restricting methods and means to archery equipment would be expected to significantly reduce overall harvest by reducing harvest efficiency, rather than by limiting participation.

An archery-only season would be expected to result in minimal harvest, similar to or lower than a closure, while restoring opportunity for hunters.

Compared to a full closure, an archery-only season would maintain opportunity for all hunters. Compared to a drawing permit hunt, it would provide substantially greater opportunity while likely resulting in equal or lower harvest levels due to reduced success rates.

Archery equipment is widely available and does not limit participation to a small or specialized group. Any hunter capable of participating in a sheep hunt can choose to hunt with bow and arrow equipment.

If no changes are made, management options may continue to rely on closures or drawing permits, both of which substantially reduce opportunity. This proposal offers an alternative approach that reduces harvest pressure while maintaining access for both resident and nonresident hunters.

This approach functions as a conservation tool that preserves opportunity while reducing harvest.

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

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Paul Forward (OI-F26-215)

Proposal 111

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI351.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-148)

Proposal 112

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI352.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-150)

Proposal 113

5 AAC 85.010. Hunting seasons and bag limits for bison.

Restrict nonresident hunting for Bison in GMU 19 as follows:

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

Remove non-resident pool for Bison

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

I would like to see Bison to resident only. There is a short supply of draw tags for Bison within the state, and the resident pool of applicants far exceeds availability. There is a lot of availability for bison hunting in the lower 48 for nonresident pool. There is minimal revenue to the state based on nonresidents applying and successfully drawing the tag.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-039)

Proposal 114

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

Make changes to allocations in hunts RM653, DM681, and DM682 based on 2 year average bull to cow ratios as follows:

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

The Farewell area is an important resource for Alaska residents looking to get their moose meat. Therefore, when the 2-year average bull-to-cow ratio is below the management objective minimum of 30 bulls:100 cows hunters should be limited by using: 1) a first-come-first-serve limited registration permit for residents (RM653), and 2) a draw hunt for non-residents (DM681/682). Allocation should be 90% residents and 10% non-residents. When the 2-year average bull:cow ratio is above 30:100 resident registration permits (RM653) will be unlimited, and nonresidents will remain under the current drawing hunt structure with 20 permits issued (DM681/682).

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

Overharvest of bull moose in Unit 19C in the Farewell area. Moose hunting pressure at Farewell steadily increased through RY23 while at the same time the bull:cow ratio was declining. In March 2020 the board created a registration permit (RM653) for both residents and nonresidents in the Farewell area to better track hunter effort and harvest. In March 2023 the board created a draw

hunt for nonresidents (proposal 205) to address crowding issues and reduce the amount of harvest. Since RY24 there has been an unlimited number of registration permits available to residents and 20 draw permits issued to nonresidents. While the crowding issues have largely been addressed, bull:cow ratios continue to decline. Therefore, in RY26 the department is only going to issue 100 registration permits (RM653) to residents (first-come-first-serve) and 10 draw permits (7 DM681 and 3 DM682) to nonresidents.

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

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-173)

Proposal 115

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

Amend hunts RM653, DM681, and DM682 to Unlimited Registration for Alaskan Residents and limited to 10 Draw Permits for Non-Residents as follows:

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

Unlimited Registration for Alaskan Residents. 10 Draw Permits for Non-Residents. One Bull Per lifetime by Permit only for Non-Residents. "5" Non Resident permit to be allocated to Guides and "5" Non Resident Permits for the General Public. BOTH resident and Non Resident hunts for Moose to be held "Every Other Year" to ensure the Bull to Cow Ratio can be achieved and grow for Future Alaskan Hunters and youth.

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

Bull to Cow Ratio is at a "Critical" Low in the Farewell Area. Have hunted there for close to "30" years. We have to be "Stewards" of our precious Alaskan Resource. If we do not "ACT" swiftly and with no focus on ensuring the Bull to Cow ratio Improves, it will be a heartfelt disaster! We have to regulate ourselves for the Moose population.

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

I spoke with Hunters who I have shared Moose camp with at Farewell, both Resident and Non Resident Hunters. They 100% agree with the above Proposal for Farewell.

Robert McCaffrey, Chad McCaffrey, Lori McCaffrey, Paige McCaffrey, Grant Sullivan, Barb Eaton, Ben Eaton, Chris Diltz, Joey Diltz, Collin Pennington, Brian Wilson, Shane Wilson,

Stephen Olendorf, Neil Huey, Matt Huey, Mike Azerabeck, Mark Kasperg, Greg Kasperg, James Hunt, Jim Houschouer, Brooks Gehring, Warren Stough

PROPOSED BY: Robert McCaffrey (OI-F26-086)

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

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
2024	702	84	125	493	12%	17:100	25:100
2025	486	50	75	361	10%	14:100	21:100

Year	Total Moose	Total Calves	Total Bulls	Total Cows	Percent Calves	Calves: cows	Bull: Cow
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)

Proposal 117

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

Transition to a fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C as follows:

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

Transition to a **fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C**

1. Unified Draw System

- Replace the resident registration system with a draw system
- Maintain separate applicant pools for residents, unguided nonresidents and guide required nonresidents.

2. Allocation Structure

- Establish a defined percentage split (eg. 70% resident / 25% unguided nonresident / 5 % guide required nonresident) rather than fixed tag numbers
- Adjust total permits annually based on population data

3. Outcome-Based Management

- Set annual tags based upon desired take of moose goals and actual harvest success rates
- Adjust allocation percentages annually based on:
 - Moose population data
 - Hunter success rates
 - Cow : Bull ratio
 - Cow : Calve ratio

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 unguided – One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. DM681 September 1-20.

Nonresidents guide required - One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. DM682 September 1-20.

70% of the tags to residents / 25% to unguided nonresidents / 5% to guided nonresidents

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

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

Subject:

Implementation of a Draw-Based Allocation System for Residents & Nonresident Moose Hunting Permits in Mixed-Use Public Lands in the Farewell RM653 area of 19C

Executive Summary

This proposal recommends the implementation of a regulated draw system to allocate nonresident moose hunting permits in specific Alaska game management units where hunting pressure is high and access is supported by federally funded infrastructure. The goal is to balance resident opportunity, maintain economic benefits from nonresident hunters, maintain the

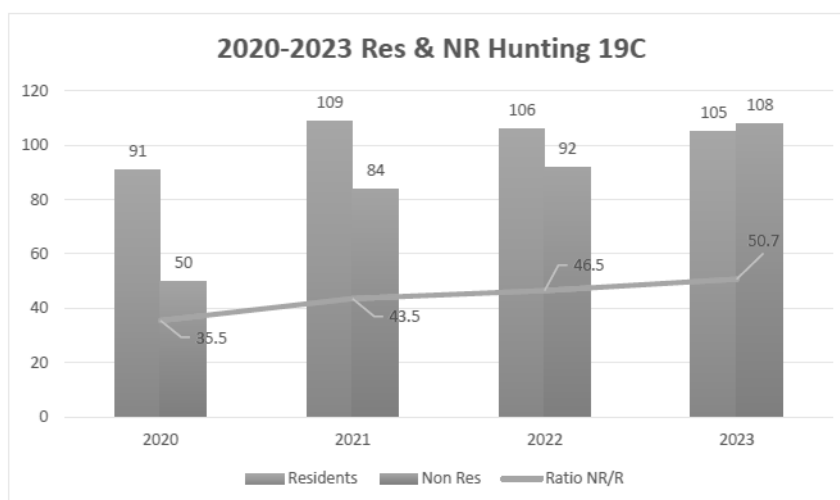
historical guiding industry of the area and ensure sustainable wildlife management aligned with established conservation principles.

Background and Justification

In the identified hunt area, RY26 current regulations allocate hunting opportunity as follows:

- Residents: 100 permits available through a limited registration system RM653
- Unguided Nonresidents: Limited to 7 permits issued through the draw system DM681
- Guide required Nonresidents: Limited to 3 permits issued through the draw system DM682

Despite this structure, historical hunt data, that before Nonresident draw was implemented, residents account for approximately **55%** of participation, while nonresidents account for **45%**.



Data from Alaska Dept of Fish and Game

A color version of this graph is available online at

<https://www.adfa.alaska.gov/index.cfm?adfa=aameboard.proposalbook>

This imbalance raises concerns regarding equitable access for Alaska residents, particularly in areas where:

- Access is facilitated by federally funded infrastructure including departing airports and the Farewell Airport
- Portions of the land are managed by the Bureau of Land Management

Because these lands and access points are supported by national public funding, they represent a shared resource. However, the State of Alaska retains the authority and responsibility to manage wildlife for the benefit of its residents while balancing broader public interests.

This hybrid approach may unintentionally produce inequitable outcomes and reduce transparency in allocation fairness. At the same time, nonresident hunters provide essential revenue through higher licensing fees and contribute to local economies through outfitters and guides currently offering services in 19C.

Although the current system heavily favors residents in permit allocation (100 resident permits vs. 10 non-resident tags), actual moose population show challenges from:

- Total moose population oscillation recently trending downward
- Bull to Cow ratio below 30:100 target
- Calving recruitment
- Grizzly, Black Bear and Wolf predation

Benefits of the Proposal

Balanced Access Ensures residents retain primary access while preserving opportunities for nonresidents

Resource Sustainability

Supports controlled harvest levels aligned with biological data

Fairness and Transparency

A draw system replaces uncertainty and perceived inequities with a clear, rule-based allocation process

Conclusion

This proposal offers a balanced, data-driven approach to moose hunting allocation in the Farewell area of 19C. By implementing a structured draw system, the Alaska Board of Game can ensure equitable access, sustain wildlife populations, and maintain the economic and conservation benefits associated with both resident and nonresident hunters.

Statement to the Board

The Alaska Board of Game is uniquely positioned to ensure that Alaska's wildlife resources are managed with both fairness and long-term sustainability in mind. The current system—combining a resident registration structure with a nonresident draw—creates inconsistent allocation methods and has resulted in disproportionate harvest outcomes despite significant differences in permit numbers. By transitioning to a unified draw system with clearly defined allocation percentages, the Board can improve transparency, align opportunity with actual harvest impact, and reinforce public confidence in the regulatory process. This approach maintains Alaska's commitment to resident access while still recognizing the economic and shared-use considerations tied to federally supported lands and access infrastructure.

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

No.

PROPOSED BY: Thomas Jones

(OI-F26-129)

Proposal 118

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

Change bag limit in RM653 to One bull every two regulatory years with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side as follows:

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

I would like to recommend a change to the bag limit for the RM653 hunt in Unit 19C. There would be no change to antler restrictions or season dates, but if a resident hunter harvests a moose under RM653, they would be ineligible to receive an RM653 permit the next year. There would be no changes to the nonresident permit hunt because they already can't get a permit 2 years in a row under the drawing permit rules.

RM653 Proposed language: One bull **every two regulatory years** with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side by permit available online at hunt.alaska.gov, or in person in McGrath, Anchorage, Fairbanks and Palmer, beginning August 1

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

Overharvest of bull moose in Unit 19C in the Farewell area. Moose hunting pressure at Farewell steadily increased through RY23 while at the same time the bull:cow ratio was declining. In March 2020 the board created a registration permit (RM653) for both residents and nonresidents in the Farewell area to better track hunter effort and harvest. In March 2023 the board created a draw hunt for nonresidents (proposal 205) to address crowding issues and reduce the amount of harvest. Since RY24 there has been an unlimited number of registration permits available to residents and 20 draw permits issued to nonresidents. While the crowding issues have largely been addressed, bull:cow ratios continue to decline. Therefore, in RY26 the department is only going to issue 100 registration permits (RM653) to residents (first-come-first-serve) and 10 draw permits (7 DM681 and 3 DM682) to nonresidents.

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

No, except that the McGrath Area Management Biologist was consulted for background proposal language.

PROPOSED BY: Steve Chronic

(OI-F26-089)

Proposal 119

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

Reduce Season to Sept 1 – Sept 15 for Moose Permit RM653 as follows:

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

Moose 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 (Farewell Area), Permit RM653, Reduce Season to Sept 1 – Sept 15.

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

Over the past 5 years the department has issued an unlimited number of RM653 permits. Beginning in 2024, the BOG significantly reduced nonresident hunters in the Farewell area from approximately 100 hunters to 20 hunters. This BOG action was taken in an effort to both improve the bull cow ratio and to reduce user conflicts. After two seasons of reduced hunting effort the, bull cow ratio continues to decline below ADFG population objective.

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

Consulted several Alaska residents who hunt in the unit. Most agree a shorter season could help reduce take allowing the population to recover from over harvest.

PROPOSED BY: Brad Hinkes

(OI-F26-117)

Proposal 120

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

Amend Moose hunt under Permit RM653 to a Quota Hunt as follows:

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

Moose 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 (Farewell Area), Permit RM653 (unlimited permits issued), Quota Hunt, Sept 1 – Sept 20. Successful permit holders are required to report harvest within 12hrs of take to ADFG. Hunt will be closed by Emergency Order when the quota has been reached.

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

Over the past 5 years the department has issued an unlimited number of RM653 permits. Beginning in 2024, the BOG significantly reduced nonresident hunters in the Farewell area from approximately 100 hunters to 20 hunters. This BOG action was taken to both improve the bull

cow ratio and to reduce user conflicts. After two seasons of reduced hunting effort, the bull cow ratio continues to decline below ADFG population objective.

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

Consulted several Alaska residents who have hunted this area for many years. We believe this proposal would allow ADFG to best control over moose take in the permit area, prevent continued over harvest, allow the moose population to recover, while providing an opportunity for all hunters to participate in the hunt. Many camps and transporter schedule 2 hunt periods to accommodate 2 groups of hunters during the 20-day

season. With an Emergency closure likely to occur before the 20th, a 2nd hunt party is less likely to occur, reducing take.

PROPOSED BY: Cynthia Hinkes

(OI-F26-139)

Proposal 121

5 AAC 92.150. Evidence of sex and identity.

Change salvage rules for antlers with a spread of 55" or more as follows:

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

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In hunts with antler/horn restrictions, antlers/horns must be salvaged and may not be altered unless required by permit conditions. Antlers must remain naturally attached to the unbroken/uncut skull plate if the required number of brow tines **are not** [AREN'T] present **unless the animal has a spread of 55" or more.**

Page 30 (in bold)

Antlers must be salvaged where there are antler restrictions; such antlers must remain naturally attached to the unbroken or uncut skull plate if the required number of brow tines are not present **unless antler spread is 55" or more.** If antlers must be salvaged, they may not be altered prior to completion of all salvage requirements **unless antler spread is 55" or more.**

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

A moose which is clearly legal by spread should not be subject to brow tine restrictions or skull plate/antler alterations.

Justification:

Safety: Large sets of antlers can be very difficult to transport particularly in small planes where they often become dangerous external loads by necessity.

Economics: Large sets of antlers have negative economic impacts on transportation costs to the hunter due to bulk, particularly in aviation.

Taxidermy: Current industry standards can reconstruct animals skull/antlers to their natural state.

Regulations: Page 30 of current regulations state: "However, if the antlers are 50 or more inches wide, it doesn't matter how many brow tines are present, the moose is legal."

The intent of the current 50"/brow tine restriction regulations exist to assess moose antler spread BELOW 50", NOT over 50". It is reasonable to believe the field reconstruction of an altered skull plate and/or antlers of a bull moose 55" or greater would be sufficient to justify a legal moose by spread alone.

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

Yes. Several discussions with a former Fish and Wildlife employee and also a former Board of Game member through Michael Litzen of Litzen Guide Service.

Lastly, though I have applied this to 19C/Interior-Arctic regions it may well need to be considered state wide.

PROPOSED BY: Lex Patten

(OI-F26-030)

Proposal 122

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

Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653 as follows:

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

Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653.

Request the Subsistence Division to assist the Board do come up an Amount Necessary for Subsistence

(ANS). Scoring should be based on land ownership within the unit, number years hunting/eaten meat from the unit and years as an Alaska resident.

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

I have been going to Farewell for 48 years. In 1981, I staked 25 acres through the State's Remote Parcel Program within RM653 hunt area. Over time, I built a cabin, outbuildings, and a runway. My family spends 4-6 weeks there each year from May through September. I harvested my first moose in 1980, and we have taken one at Farewell every year since, along with caribou, bison,

sheep, and both black and brown bear. Farewell is more than a hunting area—it is a central part of our lives, and protecting its resources is a top priority.

Over the decades, I've seen major changes. In the 1980s, hunters were scarce, and the season ran through October 10. Today, it is a limited registration hunt. While ADFG has managed harvests well, moose numbers continue to decline despite restrictions. As a long-time subsistence user, I am concerned our opportunity to harvest moose is at risk. Others who have hunted here for 20–30 years face the same issue. I ask the Board to protect long-term subsistence users until the population recovers.

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

Consulted several Alaska residents/long term users of the unit. All who I spoke to were in favor of this proposal.

PROPOSED BY: Michael Hinkes

(OI-F26-059)

Proposal 123

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

Shift the season dates for all moose hunters in Unit 21A from September 5-25th to September 1-20 as follows:

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

The McGrath AC would like to shift the season dates for all moose hunters in Unit 21A. Currently the season is September 5-25th and this proposal would make the season September 1-20. This change will maintain 20 days of opportunity, and two 10-day hunt periods which is important to guides and transporters. We anticipate an earlier season end date will result in a small reduction in harvest which should stop the decline in the bull to cow ratio.

(19)

Unit 21(A) RESIDENT HUNTERS: 1 antlered bull by registration permit only **Sept. 1 – Sept. 20** [SEPT. 5 - SEPT. 25] NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by registration only **Sept. 1 – Sept. 20** [SEPT. 5 - SEPT. 25]

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

Overharvest of bull moose in Unit 21A. Moose hunting pressure in unit 21A has been steadily increasing over the last 10 years, while at the same time the bull:cow ratio has been declining. The McGrath AC would like to reduce harvest slightly in an effort to stop this decline and ensure the bull:cow ratio remains above 25 bulls:100 cows.

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

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-177)

Proposal 124

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during part of February and March in Unit 21E as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
-----------------------------	---	------------------------------------

(19)

Unit 21(E)

...

RESIDENT HUNTERS:

...

1 moose, by registration permit
only, a person may not take a cow
accompanied by a calf

Feb 15 – Mar 15

...

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The goal of reauthorizing is to provide additional harvest opportunity and meet harvest objectives.

The most current survey results from 2025 indicated there are approximately 11,400 moose in Unit 21E, which is slightly above the intensive management (IM) population objective of 9,000–11,000 moose. Based on the population estimate of 11,400 moose, there is currently a harvestable surplus of approximately 450 moose; however, many of those moose are not accessible in the fall.

Approximately 200 moose are harvested each fall along the rivers. The most recent fall composition survey in 2024 showed 33 bulls per 100 cows and 41 calves per 100 cows. The IM harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 2.0 moose/mi² in 2025. Twinning surveys were conducted in 2024 and 2025 in the Holy Cross area, and the average twinning rate for those 2 years was 41%. Browse utilization remains high in the Holy Cross area where the population density is highest and winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure temporally and allow access to areas inaccessible in the fall.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-018)

Proposal 125

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

Extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit to Feb 15th – March 31st as follows:

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

The GASH AC would like to extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit. Currently the season is Feb 15th – March 15th, and this proposal would make the season Feb 15th – March 31st. This change will provide an extra two weeks of hunting opportunity during a period that typically experiences warmer weather, and improved snow conditions for travel. We anticipate this change may improve the harvest on the RM837 permit, which is extremely low (average = 7.3 moose/year). The most recent population estimate (2025) for 21E is above the IM objective range of 9,000-11,000, which supports the liberalization of the winter moose hunting season.

(19)

Unit 21(E) RESIDENT HUNTERS: 1 moose by registration permit only, a person may not take a cow accompanied by a calf **Feb. 15 – Mar. 31** [FEB. 15 - MAR. 15] NONRESIDENT HUNTERS: No open Season

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

Weather (extreme cold) and snow levels often make the Feb 15 – Mar 15 difficult for residents of the GASH (Grayling, Anvik, Shageluk, and Holy Cross). Extending the season for an additional two weeks to the end of March would provide more opportunities to harvest moose for residents that were unable to harvest during the fall season.

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

This proposal was developed by the GASH AC and was unanimously supported.

PROPOSED BY: Grayling/Anvik/Shageluk/Holy Cross (GASH) Fish & Game Advisory Committee
(OI-F26-170)

Proposal 126

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Amend Bear baiting in Unit 19 to two seasons July 1 - Oct 31 /Apr 1 - Jun 30 as follows:

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

With the cost of fuel going up in the past few years and also with current fuel prices and possibility of fuel going up even higher for boat gas, the Bethel AC has proposed a change in season dates for Bear Baiting in Unit 19. With these new dates, it will put less stress on the hunters / subsistence users for with-in Unit 19, especially when the hunters / subsistence users have to remove their bear bait equipment and put it back up with-in 30 days.

Bear Baiting New Proposed Dates -----July 1st -Oct 31st / Apr 1st – June 30th

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

The Bethel AC would like to Propose a change of Season Dates for Unit 19 Bear Baiting. With the current regulations the Hunter / Subsistence User is required to pull their Bear Baiting Sites by June 30 and if they want to Bear Bait again, they have to wait until Aug 1st to do so. The amount of time that is put to get the sites setup is time consuming. With there being a No Closed Season for Brown and Black Bears the Hunters / Subsistence User will have a better opportunity for taking bears that are in season for Bear Baiting.

Unit 19 Bear Baiting Season -----Aug 1st to Oct 31st / Apr 15th – June 30th

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

PROPOSED BY: Bethel Advisory Committee (OI-F26-068)

Proposal 127

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations as follows:

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

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations.

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

Currently, there is no open small game hunting season for beaver in Unit 19, while the neighboring Unit 18 allows year-round harvest with no bag limit. This inconsistency in regulations creates unnecessary restrictions for residents of Unit 19, particularly those who rely on beaver as a subsistence food source.

Beaver have a long history of use in Alaska for both their meat and fur. Under current regulations, residents of Unit 19 are prevented from harvesting beaver opportunistically for food when they encounter them outside of trapping seasons. This limits access to a valuable subsistence resource and creates confusion between adjacent units with similar ecological conditions.

If no change is made, Unit 19 residents will continue to face unnecessary barriers to harvesting beaver for food, despite healthy populations and more liberal regulations in neighboring Unit 18. Aligning regulations would improve subsistence opportunity and regulatory consistency without negatively impacting the resource.

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

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-083)

Proposal 128

5 AAC 84.270. Furbearer trapping

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit as follows:

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

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit.

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

Currently, trapping season for beaver in Unit 19 has a season from Sept 1-June 10, while the neighboring Unit 18 allows year-round harvest with no bag limit. This inconsistency in regulations creates unnecessary restrictions for residents of Unit 19, particularly those who rely on beaver as a subsistence food source.

Beaver have a long history of use in Alaska for both their meat and fur. Under current regulations, residents of Unit 19 are prevented from harvesting beaver for food by trapping them. This limits access to a valuable subsistence resource and creates confusion between adjacent units with similar ecological conditions.

If no change is made, Unit 19 residents will continue to face unnecessary barriers to harvesting beaver for food, despite healthy populations and more liberal regulations in neighboring Unit 18. Aligning regulations would improve subsistence opportunity and regulatory consistency without negatively impacting the resource.

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

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-082)

Tok Area - Units 12 & 20E

Proposal 129

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Establish a Tier II hunt for the Fortymile caribou herd as follows:

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

Add a Tier II Subsistence hunting permit hunt for the Fortymile caribou herd (FCH) in Units 12, 20(D), 20(E), and 25(C) outside of the Fairbanks Nonsubsistence Use Area. The number of permits available, seasons, and bag limits will need to be determined by the Board of Game (board).

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(15)

...

Units 20(B) and 20(F), those portions south of the Yukon River, and north and east of a line formed by the Richardson Highway from the Unit 20(D) boundary to its intersection with the Steese Highway, north along the Steese Highway to its intersection with the Elliot Highway, then northwest along the Elliot Highway to its intersection with the Dalton Highway, then north along the Dalton Highway to the Yukon River, and Unit 20(D) that portion north of the south bank of the Tanana River

RESIDENT HUNTERS:

1 caribou, per lifetime
of a hunter, by youth hunt

Aug. 1—Aug. 21

drawing permit; up to 30 total permits may be issued; or

Up to 3 caribou by registration permit only; or

Aug. 1—Sept. 30
Oct. 21—Mar. 31

1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during Dec. 1 - Mar. 31

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

1 bull by registration permit only

Aug. 10—Sept. 30

...

Unit 20(E)

RESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

Up to 3 caribou by registration permit only; or

Aug. 1—Sept. 30
Oct. 21—Mar. 31

1 caribou by registration permit only, during a season for up to three days that may be announced by emergency order within a portion of the area during the period Oct. 20 - Nov. 30; or

(Season to be announced by emergency order)

1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during Dec. 1 - Mar. 31

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

1 bull by registration permit only

Aug. 10—Sept. 30

...

(20)

...

Unit 25(C)

RESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

Up to 3 caribou by registration permit only; or

Aug. 1—Sept. 30
Oct. 21—Mar. 31

1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during Dec. 1 - Mar. 31

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

1 bull by registration permit
only

Aug. 10—Sept. 30

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

Establish a Tier II hunt in regulation for the Fortymile caribou herd in Units 12, 20(D), 20(E), and 25(C), outside the Fairbanks Nonsubsistence Area (FNSA), as required by statute, in case a Tier II hunt is needed to further restrict the take of this game population to meet sustained yield and subsistence law mandates. The board made a positive customary and traditional use finding for the FCH in Units 12, 20(D), 20(E), and 25(C), outside the FNSA and determined an amount reasonably necessary for subsistence uses (ANS) of 350–400 caribou.

Following years of steady increase, the herd reached peak population size of 83,000 caribou in 2017, which was at or above the last peak observed in the early 1960s. The herd has now been declining over the past 9 years at an average of 14% per year. Lower parturition rates of 3-year-old cows, and reduced weights of newborn and four-month-old calves indicate the nutritional condition of the herd declined as the herd reached or exceeded the carrying capacity of the range. Lower annual survival and productivity, along with intentional reductions of the herd through an increase in harvest in 2020 and 2021 to lessen the impact to the range, resulted in a decline to 29,000 caribou by 2024 and a modeled estimate of 24,000–28,000 caribou in summer 2025. The department has not observed strong indication that productivity or annual survival have begun to improve, suggesting the herd is likely to continue to decline during the next several years.

The 2025 harvestable surplus was estimated at 480–560 bull caribou. However, if modeled estimates of decline continue, the population is projected to be 17,500 or fewer caribou at some point during 2028–2030. At this population level, harvestable surplus will drop below the lower bound of the ANS range and the board may wish to consider whether current regulations continue to provide reasonable opportunity for subsistence uses or whether replacing the current hunt structure with a Tier II hunt is necessary if harvestable surplus is unable to provide for all subsistence uses.

The current hunt structure was developed by the Fortymile Harvest Coalition and is outlined in the Fortymile Harvest Management Plan which has been reviewed and readopted by the board on a regular basis. It includes a fall and winter unlimited registration hunt in Units 20B, 20D, 20E, 20F, and 25C, with harvest quotas partitioned into zones to disperse hunting pressure and allow maximum hunting opportunity by various user groups and communities (Figure 1). A significant portion of the annual FCH range and harvest occurs in the FNSA in Units 20B, 25C, and 20D. Over the past 10 years, an average of 292 caribou were harvested annually from within the FNSA by resident hunters in the fall, representing 21% of the total annual fall harvest. Over the same time

period, an average of 114 caribou were harvested annually from within the FNSA by residents during the winter hunt, representing 16% of the total annual winter harvest. Over the past 10 years, satellite linked collars on FCH have shown that 69% of the collar locations occur outside the FNSA during the fall hunt period and 70% of the collar locations occur outside the FNSA during the winter hunt period.

The board may not authorize subsistence hunting in nonsubsistence areas. In these areas, the subsistence priority does not apply, which may complicate or limit regulatory options if a Tier II subsistence hunt is established, see again, Figure 1. Approximately 79% and 74% of the harvest in the fall and winter respectively occur outside of the FNSA. If the harvestable surplus is below the lower end of the ANS range, the state subsistence law states that opportunity shall be allocated according to Tier II criteria. If there is no Tier II regulation, then the department does not have the authority to distinguish among subsistence users and will be required to close all opportunity (all existing hunts including hunt areas outside the NSA) until the board can take action.

The board will need to determine appropriate seasons, bag limits, and the maximum number of Tier II subsistence permits that can be issued for the Tier II hunt.

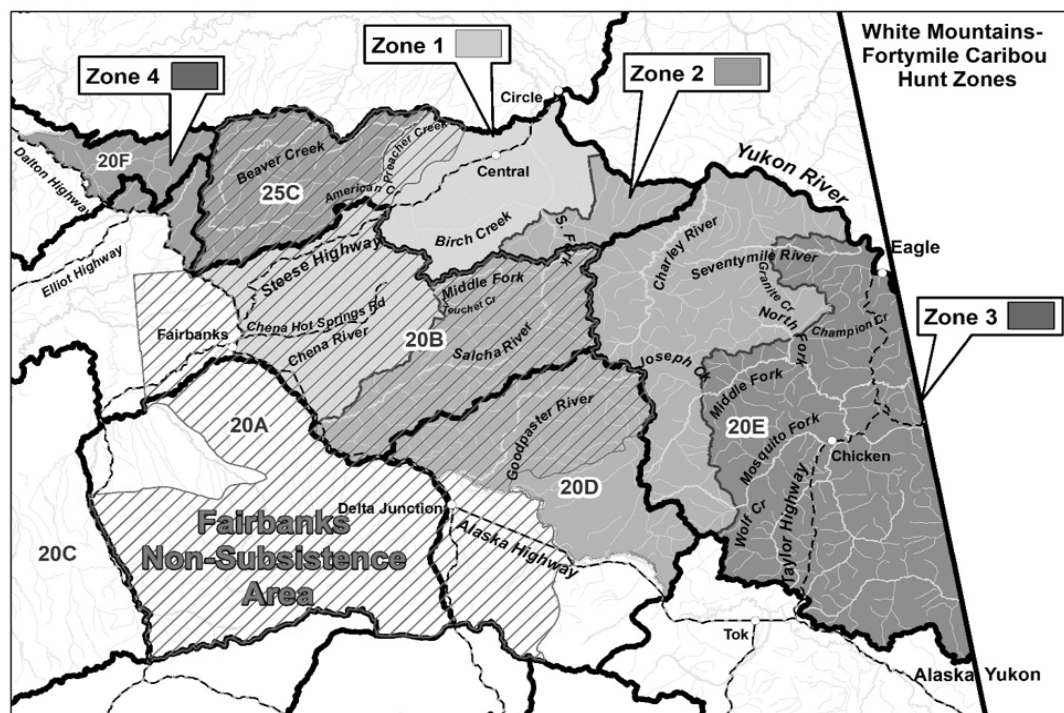


Figure 1. Fortymile caribou herd hunt zones and the Fairbanks Non-Subsistence Area. A color version can be found online at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-023)

Proposal 130

5 AAC 85.025; 92.050. Hunting seasons and bag limits for caribou; Required permit hunt conditions and procedures.

Make changes to non resident hunt allotment for 40 mile Caribou herd based on harvestable quota as follows:

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

When the overall quota is above 1,000, allow nonresident hunting in all zones.

When the quota is between 400 and 1,000, authorize nonresident hunting only in Zone 2 under a limited draw permit hunt. Issue nonresident draw permits equal to 50 percent of the Zone 2 quota. These draw permits would not be subject to emergency closures that may apply to the RC860 registration permit, providing predictable season dates for successful applicants.

When the quota is below 400, prohibit nonresident hunting in all zones.

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

The Fortymile Caribou Herd has continued to decline in recent years, resulting in substantial reductions to the fall RC860 harvest allocation. From 2021 to 2025, the quota decreased from 4,500 to 395, with an average annual reduction of roughly 31%. Throughout this period, the quota was divided among Zones 1, 2, 3, and 4 to distribute hunting pressure and opportunity across the herd's range.

From 2021 through 2024, resident hunters accounted for 75% of the total harvest, with nonresidents accounting for 25%.

In RY2025, this pattern shifted. During the state season, resident harvest fell to 35% while nonresident harvest rose to 65% of the total harvest. In Zone 2, nonresidents represented roughly half of the hunter effort yet accounted for 70% of the harvest. The zone closed early after reaching its quota in early September. Meanwhile, low zone quotas, large caribou concentrations near the Steese Highway, and high harvest during the federal season prevented Zones 1 and 4 from opening to state hunters without exceeding allowable harvest. Zone 3 remained open for the full season but yielded only single digit harvest despite receiving 56% of all hunter effort.

Across all zones over the past five years, nonresidents have averaged only about 17% of the total annual hunter effort and have consistently taken roughly 22% of the annual fall quota. Under low quotas, however, this distribution becomes increasingly consequential. Reduced allocations, short seasons, limited access, and zone closures disproportionately affect resident hunters who depend heavily on road-based opportunities. If the harvestable surplus continues to decline, maintaining reasonable resident opportunity within a registration permit system will require revising when and where nonresident hunting is allowed and restructuring permit approaches to better align harvest opportunity and distribution with available quotas.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-199)

Proposal 131

5 AAC 85.025. Hunting seasons and bag limits for caribou.

In the RC 860 hunt eliminate nonresident hunting opportunity, except nonresident military, in Zones 1, 3, and 4 and shorten the nonresident season in Zone 2 as follows:

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

At this time, with the FCH in such a steep decline, we propose to eliminate nonresident hunting opportunity (except nonresident military) in Zones 1, 3, and 4 for the RC 860 hunt until such time as the herd increases and is stable. We also propose shortening the nonresident season in Zone 2 as follows:

RC 860 Nonresident (*nonresident military hunters are exempt*)

Zones 1, 3, & 4 – No Open Season

Zone 2 Aug 10 – Sept 5

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

Decline of Fortymile Caribou Herd + Unlimited Nonresident Opportunity

The Fortymile Caribou Herd (FCH) has declined to about 26,000 animals, well under the Intensive Management (IM) population objective of 50,000 – 70,000 animals. We are not close to meeting the IM harvest objective of 1,000 animals.

In 2025, nonresident caribou hunters harvested 40% of the total harvest from the FCH during the fall RC 860 hunt. Most all of those nonresidents are not nonresident military. (*charts courtesy ADF&G*).

RC860 Harvest by Residency									
Regulatory Year	Total Harvest	Total Resident Harvest (% of total harvest)		Total Resident - Single Harvest per Hunter (% of total Harvest)		% Resident Success Rate - Single Harvest per Hunter	Total Nonresident Harvest (% of total harvest)		% Nonresident Success Rate
2021	2581	2142	(83)	2127	(82)	(37)	439	(17)	(42)
2022	795	587	(74)	585	(74)	(15)	208	(26)	(27)
2023	834	649	(78)	642	(77)	(25)	185	(22)	(37)
2024	350	240	(69)	240	(69)	(13)	110	(31)	(34)
2025	213	128	(60)	106	(50)	(15)	85	(40)	(42)

In Zone 2, the season was closed 25 days early in 2025 due to the high number of nonresident fly-in hunters harvesting caribou. The Zone 2 quota was 100 bulls and the harvest was 121 bulls. Zone 2 is the primary area where air-taxis/transporters fly their nonresident clients. These air-taxis and transporters typically book clients well ahead of that year's hunt and may book clients throughout the Aug 10 – Sept 30 season. So, when the season closes early, the clients booked to hunt after the closure aren't allowed to hunt and trips must be canceled, which is hard on all involved.

~68% of the caribou harvest in Zone 2 in 2025 was from nonresident hunters. The only nonresident harvest in 2025 was from Zone 2, which was an outlier compared to other years. Zones 1 & 4 did not open in 2025 as scheduled due to abundant caribou near the highway and there were few caribou in Zone 3.

RC860 Harvests by Residency												
Regulatory Year	Zone 1			Zone 2			Zone 3			Zone 4		
	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total
2021	1822	240	2062	74	143	217	208	45	253	38	11	49
2022	196	50	246	51	85	136	339	73	412	1	0	1
2023	604	105	709	38	77	115	6	2	8	1	1	2
2024	173	30	203	44	73	117	5	0	5	18	7	25
2025	79	0	79	36	85	121	6	0	6	7	0	7

As you can see from the chart below, nonresidents (both nonresident military and non-military) do hunt along the road system when the zones are open and caribou are available.

RC860 Hunters by Residency												
Regulatory Year	Zone 1			Zone 2			Zone 3			Zone 4		
	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total
2021	4024	575	4599	184	198	382	1496	248	1744	106	24	130
2022	2288	385	2673	209	161	370	1423	221	1644	95	12	107
2023	1681	224	1905	156	152	308	661	115	776	29	8	37
2024	1080	139	1219	168	114	282	580	53	633	75	10	85
2025	127	2	129	139	128	267	440	70	510	10	1	11

During the last cycle, RHAK submitted a proposal to prohibit nonresident hunters from participating in the RC 860 fall hunt in Zones 1, 3, and 4. After discussions with air-

taxis/transporters we agreed to leave Zone 2 open to nonresident hunters. The board voted down our proposal saying that they did not want to prevent nonresident military hunters from participating in the RC 860 hunt along the road system. We tried to amend our proposal to exempt nonresident military hunters but there was confusion as to whether Alaska Wildlife Troopers could tell if a nonresident was military or not.

As we found out, while the RC 860 permit does not identify a nonresident vs a nonresident military hunter, the actual hunting license does identify whether a nonresident is military or not. So, Troopers can easily tell if a nonresident hunter is a nonresident military hunter.

Number of Nonresident Military Licenses Sold

In 2025, 614 nonresident military hunting licenses were sold, and 1, 327 nonresident military combo Hunt/Sport Fish licenses were sold. For the five years 2021 – 2025 the range of nonresident military hunt licenses sold was 560 - 625, and the range of nonresident military combo Hunt/Sport Fish licenses sold during that same time period was 1,327 – 1,560 (data from ADF&G License Statistics). We included this data for the board's information but have no way of knowing how many nonresident military hunters participate in the RC 860 caribou hunt.

Nonresident Military License

Below is a blank copy of a hunt/fish/trap license (front page). The arrows on the right point down to the nonresident military hunt or nonresident military hunt/sport fish boxes, one of which would be checked if that hunter was nonresident military.

STATE OF ALASKA SPORT FISHING, HUNTING, TRAPPING LICENSE										ANNUAL LICENSES EXPIRE DEC 31, AA 2026	
RESIDENT Requires Affidavit 11-524											
RES CLASS 01 \$20 Sport Fish	RES CLASS 02 \$45 Hunt	RES CLASS 3A \$65 Hunt/Trap	RES CLASS 3B \$25 Trap	RES CLASS 04 \$60 Hunt/Sport Fish	RES CLASS 05 \$85 Hunt/Trap/ Sport Fish	BLIND RES. CLASS 1A \$0.50 Sport Fish	BLIND RES. CLASS 2A \$45 Hunting				
REQUIRED FOR RESIDENT LICENSES When did your Alaska residency begin? Year _____ Month _____		License is not valid if more than one class is indicated. RES= Resident NR= Nonresident						RESIDENT TRAPPING LICENSES EXPIRE SEP 30, 2027. CLASS 6A, 6B, 6C, 6D and 9C valid for specified period only.			
INFORMATION REQUIRED - PLEASE PRINT CLEARLY FIRST _____ MI _____ LAST _____ GENDER _____ BIRTHDATE (MM.DD.YYYY) _____ ADDRESS _____ CITY _____ STATE/PROVINCE _____ ZIP/POSTAL CODE _____ COUNTRY _____ DRIVER'S LICENSE OR ID _____ PHONE _____ EMAIL _____ State _____ Number _____											
VENDOR COMPLETES THIS SECTION FOR ALL LICENSES ISSUED. VENDOR NUMBER _____ CLASS ISSUED _____ DATE ISSUED (MM.DD.YYYY) _____ I have read and understand the definition of Alaska "resident" (AS 16.05.415). My license has not been suspended or revoked in any state. This information is subject to public disclosure. Making false statements herein is subject to criminal penalties (AS 11.56.210, AS 16.05.420, & AS 16.05.665). I certify all the information is true and correct.											
X VENDOR SIGNATURE License not valid unless signed by both Licensee and Vendor.						X LICENSEE SIGNATURE					
NONRESIDENT START DATE AND END DATE FOR CLASSES 6A, 6B, 6C, 6D and 9C ONLY. START DATE _____ HOUR _____ AM _____ PM _____ END DATE _____ HOUR _____ AM _____ PM _____											
NR CLASS 6A 14-DAY \$75 Sport Fish	NR CLASS 6B 3-DAY \$30 Sport Fish	NR CLASS 6C 1-DAY \$15 Sport Fish	NR CLASS 6D 7-DAY \$45 Sport Fish	NR CLASS 9C \$205 Annual Hunt/ 7-Day Sport Fish	NR CLASS 07 \$100 Sport Fish	NR CLASS 08 \$45 Hunt	NR CLASS 8A \$60 Small Game				
NR CLASS 09 \$260 Hunt/ Sport Fish	NR CLASS 10 \$405 Hunt/Trap	NR ALIEN CLASS 15 \$630 Hunt	COMPLETE AFFIDAVIT ON BACK OF DEPARTMENT COPY BEFORE ISSUANCE OF THESE LICENSES CLASS 18 Original License Class \$5 RES CLASS 5A \$5 Low Income Hunt/Trap/ Sport Fish RES CLASS 5B \$2 Duplicate class 5A Low Income NR YUKON CLASS 11 \$20 Sport Fish NR MILITARY CLASS 12 \$20 Sport Fish NR MILITARY CLASS 16 \$45 Hunt NR MILITARY CLASS 17 \$60 Hunt/Sport Fish								

Alaska Department of Fish and Game, Licensing, PO Box 115525, Juneau AK 99811-5525 (907)465-2376

DEPARTMENT COPY
PRESS DOWN FOR CLEAR COPIES

On the back of the license there is a section in the bottom right that one fills out under penalty of perjury in order to receive a nonresident military license at a reduced cost.

AFFIDAVIT SUPPORTING LICENSE APPLICATION Complete the appropriate section and sign below.

RESIDENT LOW INCOME - Class 5A I am entitled to the Resident Hunting, Sport Fishing and Trapping License for a fee of \$5.00 for the following reason: ☐ I am the head of a family, or a dependant of a family; or ☐ I am solely dependent on myself for support. AND My family/household annual income for the preceding year is equal to or less than the poverty guidelines for Alaska set by the U.S. Department of Health and Human Services. AS 16.05.340(a)(6) Low-Income (Poverty) Guidelines may be found at the following web-site: https://aspe.hhs.gov/poverty-guidelines By signing this affidavit and purchasing a Resident Low Income (Class 5A) License I authorize the release of information by the Division of Public Assistance to the Department of Fish and Game necessary to verify my participation in any need-based program which qualifies me for this special category license and to the Department of Public Safety as necessary to investigate false claims for this license. A family's gross annual income must include all sources of income for ALL family members including permanent fund dividends, as well as any other dividends or interest payments received. A person must provide proof of eligibility under this paragraph when requested by the Department of Fish and Game or the Department of Public Safety. SURCHARGE DISCLOSURES (per AS16.05.340) HUNTING: A Wildlife Intensive Management Surcharge has been applied to all hunting licenses; Resident Hunting Licenses: \$10, Nonresident Hunting Licenses: \$30. NOTE: Making a false statement, or omitting a material fact, is subject to a maximum penalty of \$25,000 and/or 1 year imprisonment under AS 11.56.210 and 16.05.420, 665. Alaska Department of Fish and Game, Licensing, PO Box 115525, Juneau AK 99811-5525 (907)465-2376	DUPLICATE LICENSE - Classes 18 and 5B I hereby report the loss of my current Sport License issued to me in accordance with the Department of Fish and Game statutes and regulations as indicated below: <table border="1"><tr><td>License Class (REQUIRED)</td><td>License Number (if known)</td><td>Date of Issuance</td></tr><tr><td colspan="2">Issued By (Name of License Vendor)</td><td>Place of Issuance</td></tr></table> NONRESIDENT YUKON RECIPROCAL SPORT FISHING LICENSE - Class 11 <table border="1"><tr><td>Yukon Resident Sport Fishing License Number</td><td>Yukon Government Issued ID. Number</td></tr></table> NONRESIDENT MILITARY - Classes 12, 16 and 17 (Must be stationed in Alaska) I am entitled to the special nonresident Military License for the following reason: ☐ I am a member of the military service on active duty permanently stationed in Alaska; or ☐ I am a dependant of a member of the military service on active duty permanently stationed in Alaska. <table border="1"><tr><td>Branch of Military Service</td><td>Rank and I.D. Number</td></tr><tr><td>Assigned Duty Station</td><td>If a dependant, what is relationship?</td></tr></table> NOTE: Please read definition of resident to determine residency status. I hereby certify under penalty of perjury that all the above information is true and correct. <table border="1"><tr><td>X LICENSEE SIGNATURE</td><td>DATE</td></tr></table>	License Class (REQUIRED)	License Number (if known)	Date of Issuance	Issued By (Name of License Vendor)		Place of Issuance	Yukon Resident Sport Fishing License Number	Yukon Government Issued ID. Number	Branch of Military Service	Rank and I.D. Number	Assigned Duty Station	If a dependant, what is relationship?	X LICENSEE SIGNATURE	DATE
License Class (REQUIRED)	License Number (if known)	Date of Issuance													
Issued By (Name of License Vendor)		Place of Issuance													
Yukon Resident Sport Fishing License Number	Yukon Government Issued ID. Number														
Branch of Military Service	Rank and I.D. Number														
Assigned Duty Station	If a dependant, what is relationship?														
X LICENSEE SIGNATURE	DATE														

It is possible for troopers to distinguish between a nonresident hunter and a nonresident military hunter. A regulation that only allows nonresident military hunters is enforceable.

With the FCH in such a steep decline, we don't believe there should be any non-military nonresident hunting at all, however, we recognize that the fly-in portion of Zone 2 is important to air-taxi and transporters who cater to nonresident hunters and we'd like to provide some nonresident opportunity in Zone 2, albeit with a shorter season. With the decline of the herd and reduced quotas, we believe a shorter nonresident season in Zone 2 is best for everyone. That ensures there is some opportunity without the likelihood of going over the quota and the season closing early.

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

Thank you to Department staff for providing the data and information!

PROPOSED BY: Resident Hunters of Alaska (OI-F26-090)

Proposal 132

5 AAC 85.025. Hunting seasons and bag limits for caribou.

40 mile caribou herd Restrict Non-resident hunting in Zone 2 RC 860 Non-resident (except Non-resident Military) as follows:

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

Restrict Non-resident hunting in Zone 2

RC 860 Non-resident (except Non-resident Military) All Zones No Open Season.

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

The Fortymile Caribou hunt is a very popular hunt for the Alaskan Resident. With the severe herd decline from over 60,000 to 26,000 animals, the harvestable surplus has been reduced to less than 400.

The non-resident harvest for this herd is over 25% in Zones 1, 3 and 4. Zone 2 non-resident harvest is about 70% of the allowable 100 animal quota.

The unpredictable dates and short openings because of large concentration of animals in Zones 1, 3, & 4, and the closing of other caribou hunts have put pressure on Zone 2 by non-residents, where the season is open from Aug. 10th to Sept 30th. It is also easily accessible and targeted by commercial transporters. Zone 2 is a mainstay for the residents of the Salcha, Chena, and Goodpaster drainages, plus many other resident hunters.

Nonresident hunting in Zone 2 has reduced the resident opportunity by early closure dates for this hunt.

Because of the popularity of this hunt with residents and the low quota, this hunt should be for residents and severely restricted for non-residents in Zone 2.

Some other options other than a nonresident closure could be:

1. Non-resident with a guide only.
2. Reduced dates for Non-residents Aug.10th to Aug. 25th.
3. Have a Non-resident draw hunt, limiting the available number of tags based on quota.
4. Allow Non-resident military to hunt.

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

I have talked to resident hunters that Hunt Zone 2 and members of the Salcha River Property Owners along with gathering information from ADF&G.

PROPOSED BY: Kenneth Armstrong (OI-F26-111)

Proposal 133

5 AAC 85.025. Hunting seasons and bag limits for caribou.

40 mile caribou hunt be restricted to residents only and made into a tier two hunt as follows:

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

40 mile caribou

With the current size of 40 mile Caribou herd offering greatly reduced hunting opportunities. The previous very liberal harvest opportunities no-longer exist. Nonresident hunters should be excluded from hunting this herd till numbers recover enough to exceed the resident hunter demand. There simply is not enough population available to offer these animals to nonresidents currently. Or conversely offer this as a tier two hunt for those who historically have hunted this herd till numbers recover enough to allow a general harvest again.

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

40 Mile Caribou,

Herd size decline limiting hunting opportunity.

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

I propose the 40 mile hunt be restricted to residents only and be made a tier two hunt.

PROPOSED BY: Thomas Ranchoff

(OI-F26-044)

Proposal 134

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Establish a resident only draw hunt for the fall RC 860 hunt whenever the herd population estimates are at or below roughly 28,000 as follows:

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

Establish a draw hunt for the fall RC 860 hunt whenever the herd population estimates are at or below roughly 28,000. This hunt would be resident only hunt and only available in zones one and four proposal. The up to number for the draw should be proportional to what the quota for that zone would have been. switching to a draw hunt when herd numbers are low allows fir a predictable harvest in a bull only hunt and prevents the possibility of over harvest that are a registration hunt could allow.

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

The current 40 mile herd manager has been extremely conservative over the past few years, even when there is a harvestable surplus of animals available, and as such as restricted hunting opportunity even to the point of not allowing a fall hunt. Finding an alternate means for opportunity needs to be explored so that hunters can still participate while allowing room for herd growth.

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

As a member of the Fairbanks AC, we have discussed this topic multiple times, but I chose to make this proposal on my own.

PROPOSED BY: Eric Anslinger (OI-F26-123)

Proposal 135

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Adjust the season opener of the forty mile RC860 hunt to Aug 5th as follows:

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

New hunt codes would be as follows

RC860 season dates Aug 5-Sept 30 (or until the quota is met)

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

Adjust the season opener of the forty mile RC860 hunt to Aug 5th. State managers should not be deferring to federal managers by allowing federal harvest before state allocation. That would be in conflict of article 8 of the state constitution and falls out of line from section E of the statehood act where the state was given sole management of its wildlife by the same federal government. I would encourage managers to support all Alaskan's opportunities.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-167)

Proposal 136

5 AAC 85.025; 92.050. Hunting seasons and bag limits for caribou; Required permit hunt conditions and procedures.

Amend the YC831 draw hunt to add Fortymile caribou hunt zones 2 and 4 to the hunt area and extend the closure date to September 30 as follows:

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

This proposal would amend the YC831 draw hunt to add Fortymile caribou hunt zones 2 and 4 to the hunt area and extend the closure date to September 30.

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

The YC831 Fortymile caribou youth draw hunt is unnecessarily restrictive. It is intended to provide early-season opportunity and encourage youth participation in caribou hunting. The current August 1 - August 21 season occurs only in Zones 1 and 3. Over the past five years, the hunt has seen high hunter participation but, because caribou distribution varies widely from year to year, harvest success has fluctuated significantly, ranging from 23% to 88%.

Restricting the hunt to only two zones limits opportunity when the herd is not present in those areas. Allowing youth to hunt in all RC860 zones ensures access to whichever portion of the Fortymile range the herd may be present. Extending the season through September 30 would also increase the likelihood that youth hunters will encounter caribou. A longer season and a wider hunt area would provide greater flexibility for families, reduce reliance on unpredictable early August herd distribution, and support a more consistent and meaningful youth hunting experience.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-200)

Proposal 137

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Limit the Non-Resident permit allocation for the Unit 20 Caribou drawing hunt YC831, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Caribou drawing hunt YC831, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Caribou drawing hunt YC831. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Caribou hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Barren Ground Caribou unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is a Youth Caribou hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-192)

Proposal 138

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Amend the seasons dates of AC999 targeted to October 1- March 31 as follows:

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

Amend the seasons dates of the AC999 targeted. The regulation would read “1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during October 1 – March 31 (Season to be announced by emergency order).”

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

Under current regulation, the Fortymile caribou targeted permit hunt, AC999 may only be implemented by emergency order between December 1 - March 31. This hunt is intended to

provide Alaska resident opportunity if the use of the Fortymile caribou winter registration hunt, RC867, presents a risk of exceeding the quota. The AC999 hunt is an important management tool used to alleviate overharvest risk when large numbers of caribou are near roadways or when other management concerns arise, while still allowing hunting opportunities for residents in specific zones. Those conditions are not date-related and could occur at any time during the winter season. Aligning the allowable use period for AC999 with the beginning date of the RC867 winter hunt, October 27, would enable managers to authorize limited hunting opportunities during a larger time frame in the winter instead of issuing full closures.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-197)

Proposal 139

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Redefine the boundaries of Zones 1 and 4 to isolate the core remote section of the current Zone 4 as follows:

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

Redefine the boundaries of Zones 1 and 4 to isolate the core remote section of the current Zone 4. By constricting Zone 4 to more remote areas of the Beaver Creek and Victoria Creek drainages, managers gain the flexibility to leave this zone open even when road-accessible quotas in Zone 1 are met or risk of overharvest exists. Given relatively low hunter effort and harvest rates, this proposal is unlikely to impact the sustainability of the herd, while providing significantly more predictable seasons and improved opportunities for remote hunters.

Additionally, this adjustment aligns the zone boundaries with the universal coding units used for departmental harvest reporting. This administrative alignment will improve the accuracy of harvest data and streamline the reporting process for both hunters and department staff.

Altered zone descriptions would read as follows:

Zone 1:

Unit 20B, that portion within the Chatanika River drainage north and east of the Steese Highway, those portions north and west of the Steese Highway, those portions north and east of the Elliot

Highway and that portion south and east of the Steese Highway, excluding the Middle Fork of the Chena River drainage upstream from and including the Teuchet Creek drainage and excluding the Salcha River drainage.

Unit 20F, those portions north and west of the Steese Highway, north and east of the Elliot Highway to its intersection with the Dalton Highway, then east of the Dalton Highway and south of the Yukon River, excluding the Chatanika River drainage.

Unit 25C, excluding that portion within the drainage of the South Fork of Birch Creek, excluding that portion within the Yukon–Charley Rivers National Preserve, and excluding that portion of 25C within the Beaver Creek and Victoria Creek drainages between and including the Moose Creek drainage and Fossil Creek drainage.

Zone 4:

Unit 25C, that portion within the Beaver Creek and Victoria Creek drainages, between and including the Moose Creek drainage and Fossil Creek drainage.

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

The Fortymile Caribou Herd has declined in recent years, resulting in reduced harvest allocations. As these limits become more restrictive, precise management is required to provide adequate hunting opportunity without overshooting established quotas. The current shared quota between Zone 1 and Zone 4 creates an avoidable management challenge and unnecessarily limits opportunity in remote areas. Zone 1 includes the Steese Highway corridor, where caribou can be highly accessible. As a result, harvest can increase quickly, raising the risk of exceeding the quota. To prevent this, managers often close both Zone 1 and Zone 4 at the same time because they are linked under the Fortymile Caribou Herd Harvest Plan. However, Zone 4 differs significantly from Zone 1; it is a remote area with limited access, strict vehicle restrictions, and low hunting pressure. Over the past five seasons, Zone 4 has accounted for an average of about 2% of total hunting effort and 1.8% of the harvest. Under the current hunt structure, hunters seeking a remote experience in Zone 4 may be affected by closures driven by high harvest levels or caribou presence along the road system in Zone 1. This reduces opportunity across the northern portion of the hunt area, even though harvest in Zone 4 poses little risk to the total harvest cap.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Management Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-201)

Proposal 140

5 AAC 92.011. Taking of game by proxy.

Prohibit proxy hunting in Units 20B, 20D, 20E, 20F, and 25C for caribou under the Fortymile registration hunts as follows:

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

Proxy hunting in Units 20B, 20D, 20E, 20F and 25C for caribou under the Fortymile registration hunts RC860 and RC867 should be prohibited.

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

Proxy hunting is currently allowed for the RC860 and RC867 caribou registration hunts in Units 20B, 20D, 20E, 20F, and 25C. The Fortymile caribou herd has been declining for several years and is now below its intensive management population and harvest objectives. As a result, harvest quotas have been reduced and allocated across zones. These low and zone distributed quotas mean that every individual harvest has a proportionally greater effect on achieving management goals and maintaining harvest distribution across the hunt area. During periods of reduced availability, allowing proxy hunting can unintentionally concentrate harvest among a smaller number of households and limit

overall hunter participation. Eliminating proxy hunting will help ensure that limited harvest opportunity is more evenly distributed among residents across all zones.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-198)

Proposal 141

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

Close the August 24-28 seasons for Moose hunting in unit 20E as follows:

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

Close the August 24-28 seasons in unit 20E.

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

A large decline in Moose numbers, corresponding decrease in harvest and an increase in hunting pressure.

In the last five years we have lost 50 percent of the Moose in 20E. Bull cow ratios have dropped significantly since 2006.

There is currently a predator control program in 20E due to the low numbers of Moose.

Back in the early 2000s this committee submitted a proposal to put the August 24-28 seasons in place, the board of game passed it and the first August 24-28 season was opened in 2006. At the time Moose numbers were trending up and the committee's goal was to provide additional hunting opportunity that would largely be utilized by residents of 12 and 20E. Initially it was very successful. In 2006 twelve Moose were taken seven of them by local hunters.

Things have changed over the last 20 years, in 2025 six moose were taken in the August season with zero by local hunters. Overall hunter numbers have increased dramatically with a decrease in local hunters. The August season in today's world tends to exasperate this issue. Hunters are coming from far and wide in the August season, they are hunting, setting up large camps and leaving them set up thereby "Claiming a hunting area". They in many cases leave and then return when the September season opens. This is serving to displace local hunters.

Another problem with the August season is meat care, some years the temperatures in this area can be in the 70s and low 80s. Taking proper care of the meat especially if you are a long way from home can be nearly impossible. The trail systems have vastly expanded and the distance people are going off of the Taylor highway on these trails has increased significantly, Increasing travel time. There are no commercial processing facility's available in the local area.

We believe this is a conservation, allocation and a meat care issue at this point.

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

This proposal was developed and submitted by the Upper Tanana 40-Mile Advisory committee with information being supplied by ADFG in Tok at our request.

PROPOSED BY: Upper Tanana/Fortymile Fish & Game Advisory Committee (OI-F26-193)

Proposal 142

5 AAC 99.025. Permit for exporting a raw skin.

Determine customary and traditional use of Dall sheep in Unit 12 and Unit 20, for that portion outside of the Tok Management Area and the Delta Management Area as follows:

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

5 AAC 99.025. Customary and traditional uses of game populations.

Determine customary and traditional use of Dall sheep in Unit 12 and Unit 20, for that portion outside of the Tok Management Area and the Delta Management Area.

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

During the 2024 Region 3 Board of Game (board) meeting in Fairbanks, the board considered proposals that increased opportunity for sheep hunting in Unit 12 and Unit 20, that portion outside of the Tok Management Area and the Delta Management Area, for residents and nonresidents. However, the board has not yet made a customary and traditional use finding for sheep in this area. Because this area is outside a nonsubsistence area, 5AAC 99.010(b) requires the board identify game populations, or portions thereof, that are customarily and traditionally taken or used by Alaska residents for subsistence uses by considering the eight criteria found at 5AAC 99.010(b)(1-8).

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-036)

Proposal 143

5 AAC 92.1XX. New Regulation.

Implement an intensive management predator control plan within the Tok Management Area to benefit Dall Sheep as follows:

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

Implement an intensive management predator control plan within the Tok Management Area to benefit Dall Sheep as follows:

Implement an intensive management predator control plan within the Tok Management Area (TMA) via aerial coyote and wolf control. Aerial coyote and wolf shooting would be allowed via private fixed wing aircraft and retrieval of coyotes and wolves would be allowed via private rotorcraft or fixed wing aircraft. In addition, the Department could remove coyotes and wolves using helicopters if necessary to supplement private efforts to meet removal objectives.

Our goal for predator control is to help the sheep population recover to historic averages more quickly than if intervention did not occur. We propose predator control be conducted until the

sheep population recovers to the long-term (2006-2019) averages. Alternatively, we propose the predator control cease following five years if there are no signs that the control is positively impacting population growth.

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

The Tok Management Area (TMA) Sheep population, like many sheep populations throughout Alaska, is currently at a historic low. The total number of sheep observed by the department during their 2025 survey with the TMA survey area was 261, which is 77% fewer than the 2006-2019 (pre-crash) average of 1145 sheep. Furthermore, the number of sheep observed in 2025 was 69% fewer than the previous low number of sheep observed in 2024 (n=835), which followed the very late spring in 2013. The current population decline has resulted in a historic low number of draw sheep permits awarded during fall 2022, 2023, 2024 and 2025. Prior to these years, the lowest number of permits awarded was 60, while only ten permits have been issued annually since 2022.

Although we recognize that weather is likely the primary contributing factor to the current decline, predation is likely an additional contributing factor. According to the department sheep research conducted in Unit 20A during the early 2000s, coyotes are one of the primary predators of lambs, while wolf predation also occurs at a lower level. We believe managing predation could help the TMA sheep population recover.

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

Yes, this proposal was developed by the Upper Tanana Fortymile Fish & Game Advisory Committee

PROPOSED BY: Upper Tanana/Fortymile Fish & Game Advisory Committee (OI-F26-196)

Proposal 144

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit the Non-Resident permit allocation for the Unit 20 Sheep drawing hunt DS206, to “Up To” 20% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Sheep drawing hunt DS206, to “Up To” 20% of the available permits. If at least 5 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Sheep drawing hunt DS206.
There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Dall Sheep hunting in Alaska is the only state in the Union that has opportunity to hunt Dall Sheep, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-178)

Proposal 145

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

For Dall Sheep hunting in the Glacier Mountain Controlled Use Area remove non resident opportunity and reduce resident opportunity as follows:

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

Sheep Unit 20E

Glacier Mountain Controlled Use Area

Resident: One ram with full-curl horn or larger by draw permit only DS XXX Aug 10 – Sept 20 (up to 5 permits)

Nonresident: No Open Season

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

**Nonresident Sheep Hunting Opportunity in Glacier Mountain Controlled Use Area (GMCUA)
Resident Sheep Hunting Opportunity in GMCUA**

Sheep hunting opportunity in the GMCUA has been closed since 2024 From the Department's announcement:

(Tok, Alaska) – All sheep seasons within the Glacier Controlled Use Area, in a portion of Unit 20E, will be closed for the 2026 season, to address public concerns for sheep in this area. This closure will only impact the 2026 season.

“The GMCUA was created in 1971 to provide greater protection for sheep that used the Glacier Mountain area. Sheep within the GMCUA are part of the larger Tanana Hills sheep population, which exists in marginal, non-contiguous sheep habitat over an expansive area of eastern interior Alaska.

The GMCUA contains a small segment of the Upper Tanana Dall sheep population. Harsh winters in 2020 and 2021 corresponded with a steep decline in sheep populations statewide. Few sheep have been observed in the GMCUA since 2019, and no legal rams have been observed or harvested in the area since 2021.

Although the full-curl harvest strategy is an extremely conservative approach to hunting management, there are times when more conservative strategies are warranted to address public concerns.

Consequently, the GMCUA was initially closed for the 2024 sheep season and will be closed again for the 2026 season.”

When/if sheep hunting opportunity is again allowed in the GMCUA, there should be no nonresident sheep hunting opportunity allowed. Small, isolated sheep populations like this one in the Yukon-Tanana uplands are of concern and should be reserved for resident sheep hunting only when sheep hunting is allowed.

Any resident sheep hunting opportunity (should this area open again) should be by draw permit only with a limited number of tags.

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-092)

Proposal 146

5 AAC 92.010(I); 92.165(a). Harvest tickets and reports; Sealing of bear skins and skulls.

Remove the requirement for hunters to possess a black bear harvest ticket prior to hunting black bears in Units 12 and 20E, and require all black bears taken in Units 12 and 20E to be sealed as follows:

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

5 AAC 92.010(I)

For black bear, a person may not hunt black bear in Units 1-7, 11, 13-16, [AND] 20(A), 20(B), 20(C), 20(D), and 20(F) , except when a permit is required, unless the person has in possession a harvest ticket for the species and has obtained a harvest report (issued with the harvest ticket).

5 AAC 92.165(a)

Sealing is required for hides and skulls of brown bear taken in any unit in the state, hides and skulls of black and brown bear taken in any unit in the state before the hide or skull is sold, hides and skulls of black bear of any color variation taken from January 1 through May 31, and skulls of black bear of any color variation taken from June 1 through December 31 in Units 1-7, 12, 14(A),

14(C), 15-7, [AND] 20(B), **and 20(E)**. The seal must remain on the skin until the tanning process has commenced. A person may not possess or transport the untanned skin or skull of a bear taken in a unit where sealing is required, or export from the state the untanned skin or skull of a bear taken anywhere in the state, unless the skin or the skull, or both as required in this section have been sealed by a department representative within 30 days after the taking, or a lesser time if requested by the department...

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

Harvest ticket requirements for black bear were adopted by the Board of Game in the late 2000s with the intent of improving effort data in areas experiencing high hunting pressure. However, many hunters harvest black bears incidentally while targeting other species or opportunistically while in the field. As a result, reported days hunted may be biased or mischaracterized. In addition, hunters may pursue black bears in this incidental manner across multiple game management units, which cannot be effectively captured under the current reporting framework.

Black bear populations are not currently monitored in Units 12 and 20E, as survey and inventory methods have proven inefficient and costly relative to the level of harvest and hunting pressure. Harvest levels in these units are estimated to be sustainable for Units 12 and 20E, with a combined annual harvest of 49–72 bears (total = 326) recorded between regulatory year (RY) 20 and RY24. During this same period, only 66 bears were sealed, likely to meet export requirements. Currently, success and effort data are not needed to manage black bear populations in Units 12 and 20E.

Implementing mandatory sealing and removing harvest ticket requirements could provide a more reliable method for documenting harvest trends and facilitate collection of additional geographic and biological data. Sealing also creates opportunities for premolar aging and tissue collection by the department, which may yield more meaningful population indices than effort, success, or harvest data alone, while also reducing reporting requirements for hunters. This change would not require any modification to the salvage requirement regulations because all areas with mandatory sealing are already addressed under 5 AAC 92.220(a)(3), which specifies salvage requirements for black bears taken in units where sealing is required. However, the change will alter the salvage requirements for black bears taken in Units 12 and 20E because salvage requirements are tied to sealing requirements. Currently, salvage requirements for black bears taken in Units 12 and 20E requires only the edible meat be salvaged if taken between January 1 and May 31, and either the edible meat or the hide must be salvaged if taken between June 1 and December 31. By requiring sealing, hunters that harvest a black bear in Units 12 and 20E will be required to salvage the edible meat, the hide, and the skull of black bears taken between January 1 and May 31, and either the skull and the edible meat or the skull and the hide of black bears taken between June 1 and December 31.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-024)

Proposal 147

5 AAC 84.270. Furbearer trapping.

Lengthen muskrat trapping season 5 days to start on Sept 15th as follows:

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

Lengthen muskrat trapping season in Units 12 and 20E as follows:

SEPT 15 [Sept 20] through Jun 10

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

Lengthen muskrat trapping season 5 days to start on Sept 15th. That aligns the season with current beaver trapping season and muskrat season in the rest of Unit 20.

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

This proposal was developed by the Upper Tanana Fortymile Fish & Game Advisory Committee

PROPOSED BY: Upper Tanana/Fortymile Fish & Game Advisory Committee

(OI-F26-194)

Delta Junction Area - Units 20D

Proposal 148

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM790, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM790, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM790.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-195)

Proposal 149

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 20 Bison drawing hunt DI403/404, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Bison drawing hunt DI403/404, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI403/404.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. This is a particularly easy and affordable area to access off the road system and provides an affordable opportunity to local Alaskans to harvest a Bison.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-171)

Proposal 150

5 AAC 92.XXX. New Regulation

Establish IM area in 20D for Moose recovery as follows:

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

“The Intensive Management area shall consist of that portion of Game Management Unit 20D north of the Tanana River. The department may implement predator control measures, including aerial control and public permit programs, to reduce predator densities to levels to allow the moose population to return to historic densities.”

Objective:

We recommend using moose density thresholds to determine when to turn predator control on and off, and when to harvest cows, to maintain the moose population near historic density of ~ 1.3 moose/sq mile in 20D north. Reduce wolf densities to 5–10 wolves per 1,000 square miles to improve moose calf survival and population growth.

Control Area: All lands within GMU 20D north of the Tanana River.

Methods:

- Public aerial control (Same-Day Airborne) under permit
- Use of aircraft, including helicopters, for access to place traps and snares
- Department aerial removal using helicopters if necessary

Strategy:

- Initial reduction phase to lower predator densities
- Maintenance phase through ongoing public and department efforts
- Monitoring:
 - Annual moose population surveys
 - Calf-to-cow ratios
 - Wolf population surveys (as available)
 - Hunter success rates

Management actions will be adjusted as needed based on observed results:

- Increased calf survival and recruitment
- Moose population growth toward objective levels
- Reversal of current population decline
- Increased hunter success and opportunity

In addition, as part of a holistic moose management program, we recommend ADF&G work with Forestry to outline limited suppression areas in northern 20D to allow Wildland fires to burn. Also to consider implementing prescribed fires and developing a program to crush or roller chop designated areas each year in road or trail accessible portions of this area to maintain moose habitat.

The moose population in GMU 20D North is declining despite adequate habitat conditions. Persistent low recruitment and high predator populations indicate a predator-limited system. Reestablishing an Intensive Management program is necessary to restore moose populations and provide for sustained human use in accordance with Alaska's sustained yield mandate.

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

We have concerns about being able to maintain moose numbers in 20D north. Moose survey data shows a downward trend in population density and persistently low recruitment. Calf-to-cow ratios are consistently below levels required for population growth (15:100 in 2019, 18:100 in 2021, and 16:100 in 2024). These values are well below the generally accepted threshold of 25 calves per 100 cows necessary for population stability or growth. This moose population declined ~ 40% following the severe weather event during the winter of 2021-2022. With low recruitment this population is at risk of further decline.

Historical evidence from the Upper Yukon–Tanana Predator Control Program (2005–2018) demonstrates that predator control can be effective in this region. Predator populations are abundant following cessation of predator control efforts in 2018. This combination of declining moose density, chronically low recruitment, and high predator abundance indicates that predation is a primary limiting factor in 20D north.

The habitat within GMU 20D North can support increased moose abundance. The 2004 Alaska wildfire season, the largest on record, burned over 6.6 million acres statewide and included extensive fires in the Upper Tanana region, including the Taylor Complex Fire, which burned over 1.3 million acres. As a result, large portions of GMU 20D North are within the 10–20 year post-fire stage, which provides optimal moose habitat. Regenerating vegetation such as willow, birch, and aspen provides abundant, high-quality forage. More recent wildfire activity has continued to create and maintain excellent habitat, resulting in a diverse mosaic of vegetation conditions across the landscape. Despite these favorable habitat conditions, moose populations have declined, demonstrating that habitat is not the limiting factor and supporting the conclusion that predation is the primary constraint on population growth.

Current moose densities in northern Unit 20D offer adequate hunter opportunity but are below the carrying capacity of the habitat. Rather than trying to continue to increase the population to a higher level closer to carrying capacity, we recommend ADF&G manage for a level of predator removal adequate to return this slow growing population to historic density levels. Without action, continued decline in the moose population may further reduce hunter success and lead to more restrictive harvest regulations. Predator control is needed in this area to aid in the recovery of the moose population to near or above historic levels, ensure calf:cows ratio support population growth as to avoid implementing moose harvest restrictions.

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

Yes this proposal came out of the Delta Junction Advisory Committee with assistance from ADFG Area Biologists in the Delta office.

PROPOSED BY: Delta Fish & Game Advisory Committee (OI-F26-152)

Proposal 151

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

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

(18) hunting seasons and bag limits for moose in Unit 20 are as follows:

...

Unit 20(D), that portion lying
west of the west bank of the
Johnson River and south of the
north bank of the Tanana

River, except the Delta Junction
Management Area and the
Bison Range Controlled Use Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100 permits may be issued may be issued in combination with those portion in the Delta Junction Management Area and the Bison Range Controlled Use Area; a person may not take a calf or a cow accompanied by a calf;	Sept. 16 – Sept. 25 (General hunt only)
--	--

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf	Oct. 10 - Nov. 25 (General hunt only)
--	--

...

Unit 20(D), that portion within
the Bison Range Controlled
Use Area

...

1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 100	Sept. 16 – Sept. 25 (General hunt only)
--	--

permits may be issued in Unit 20(D)
 lying west of the west bank of the
 Johnson River and south of the
 north bank of the Tanana
 River and the Delta Junction
 Management Area; a person may
 not take a calf or a cow
 accompanied by a calf;
 Unit 20(D), that portion within
 the Delta Junction Management Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime
 of a hunter, by youth hunt
 drawing permit only; up to 100
 permits may be issued Unit 20(D)
 lying west of the west bank of the
 Johnson River and south of the
 north bank of the Tanana
 River and the Bison Range
 Controlled Use Area; a per-
 son may not take a calf or a
 cow accompanied by a calf;
 1 moose every four regulatory
 years by drawing permit
 a person may not take a calf or
 a cow accompanied by a calf; or

Sept. 16 – Sept. 25
 (General hunt only)

Sept. 1 - Sept. 15
 (General hunt only)

...

1 antlerless moose by	Oct. 10 - Nov. 25
registration permit only;	(General hunt only)
a person may not take a calf or	
a cow accompanied by a calf	

NONRESIDENT HUNTERS:

1 moose every four regulatory	Sept. 1 - Sept. 15
years by drawing permit only,	
a person may not take a calf or	
a cow accompanied by a calf; or	

...

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

Antlerless moose hunts must be reauthorized annually by the Board of Game. The primary goals of the Unit 20D antlerless hunts are to regulate moose population growth at levels the habitat can support, provide harvest opportunity to make progress towards IM harvest objectives (500-700), and provide hunters with an additional opportunity to pursue moose without reducing bull-to-cow ratios. Antlerless moose hunts are offered in southern Unit 20D, which has the highest moose density in the unit. This area has potential for population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 40 years.

The Unit 20D moose population is slightly below the IM population objective (8,000-10,000); however, nutritional indices suggest the population is at moderate nutritional levels. In November 2025, the Southern Unit 20D population estimate was 2,518 moose (90% confidence interval 2164-2873, moose; 1.61 moose per square mile). This estimate represents a slight decrease in moose abundance compared to the 2023 survey, which estimated 3,250 moose (2.08 moose/mi²). The 2022 population estimate was 40% lower than the 2020 estimate, likely due to increased mortality because of severe winter conditions during 2021–2022, which included deep snow and winter rain events. The two-year (2024 and 2025) average twinning rate is 19.5%. An increased twinning rate following the population reduction after the winter of 2021–2022 suggests improved nutritional condition of this moose population. A reduction in browse offtake from 41% in 2022 to 21% in 2023 in Unit 20D also supports a finding of lower browsing pressure on available forage. Furthermore, short-yearling weights collected in 2025 averaged 396 lbs, which is greater than the 385 lb threshold suggestive of low nutrition but less than the 410 lb threshold suggestive of high nutrition. Thus, similar to the multi-year twinning rate estimates, the short-yearling weights suggest the moose population nutrition is now at moderate levels. The goal is to manage

the Unit 20D moose population for stability, and antlerless harvest is an important component of this management strategy.

Continued antlerless harvest is needed to maintain this population at an optimal density relative to habitat constraints and will contribute additional harvest toward meeting the IM harvest objective without reducing bull-to-cow ratios. The current population trend suggests that low, consistent antlerless harvest provided by drawing permit hunts in Unit 20D is appropriate to maintain population stability. If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond what the ability of the habitat can support, opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be further compromised.

The department will continue to evaluate antlerless moose hunts and their effect on moose density and population growth. Future antlerless moose hunts will be implemented as needed based on the evaluation of the three indices of density-dependent moose nutritional conditions in relation to changes in moose density: biomass removal of current annual growth on winter browse, proportion of females with twin calves, and late-winter calf weights.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-016)

Proposal 152

5 AAC 84.270. Furbearer trapping.

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20D as follows:

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

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20D.

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

In 2022 the regulations were changed to allow the use of a firearm and bow and arrow to take beavers under a trapping license statewide. This method of beaver harvest was allowed from 2022 until 2026, when the board was made aware of a conflicting regulation. The board clarified the conflicting regulation by returning the regulations to pre-2022 language. There are no current conservation concerns for beaver. I would like the board to restore the use of a firearm and bow and arrow as a legal method and means to take beaver under a trapping license in Unit 20D.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-159)

Galena Area - Units 21B, 21C, 21D, & 24

Proposal 153

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

Add a hunt condition for RM834, DM816, DM817, and DM818 so that hunters who receive this permit are not allowed to use aircraft for hunting moose in this hunt area as follows:

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

We want to propose adding a hunt condition for RM834, DM816, DM817, and DM818 so that hunters who receive this permit are not allowed to use aircraft for hunting moose in this hunt area, including transportation of any moose hunters, their hunting gear, and/or moose parts. However, this prohibition 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.

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

Use of aircraft in traditional hunting areas in the Kaiyuh flats are affecting subsistence hunting and land use patterns. Frequent air traffic is creating noise disturbance, low circling of wildlife and heavy airplane traffic over boats and camped hunters.

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

This proposal was developed by the Middle Yukon River Fish & Game Advisory Committee

PROPOSED BY: Middle Yukon River Fish & Game Advisory Committee (OI-F26-188)

Proposal 154

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

Split the season for DM816, DM817, DM818 so that half the draw permit hunters hunt from 9/05-9/15 and the other half hunt from 9/16-9/25 as follows:

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

We want to propose splitting the season for DM816, DM817, DM818 so that half the draw permit hunters hunt from 9/05- 9/15 and the other half hunt from 9/16-9/25. This would help to alleviate overcrowding from the middle to the end of the season.

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

Increasing number of moose hunters in the Kaiyuh area is impacting the traditional land use patterns for subsistence hunters and the quality of the hunt for all hunters.

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

This proposal was developed by the Middle Yukon River Fish & Game Advisory Committee

PROPOSED BY: Middle Yukon River Fish & Game Advisory Committee (OI-F26-189)

Proposal 155

5 AAC 92.540. Controlled Use Areas.

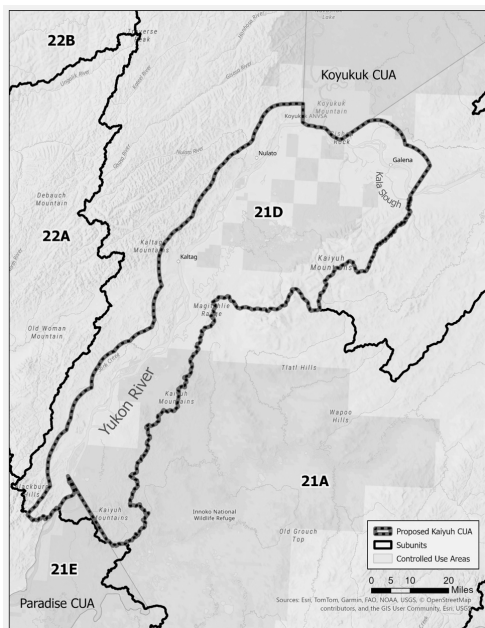
Establish a Controlled Use Area in the Kaiyuh Flats area in Unit 21D that encompasses the RM831 hunt area as follows:

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

Establish a Controlled Use Area in the Kaiyuh Flats area in Unit 21D that encompasses the RM831 hunt area, which includes the area from Kali Creek (near Galena) downstream to Blackburn Island area and extends along the Kaiyuh Mountains on the south side of the Yukon River and includes Papa Willy's area in the lower section, extends 5 miles north of the Yukon River and runs the full length from Kali Creek down to the Blackburn area.

This would reach nearly to Huslia in some sections and includes the Kaiyuh Hills and old runway areas. It covers water areas and flats but not the hilltops.

Blackburn Island was deliberately excluded as it is already covered by the existing Paradise Controlled Use Area.



A color version of this map is available at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

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

This proposal aims to reduce hunter crowding and restrict aircraft use for hunting in traditional subsistence areas in the Kaiyuh Flats area of Unit 21D. Use of aircraft in traditional hunting areas in the Kaiyuh flats are affecting subsistence hunting and land use patterns. Frequent air traffic is creating noise disturbance, low circling of wildlife and heavy airplane traffic over boats and camped hunters.

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

This proposal was developed by the Middle Yukon River Fish & Game Advisory Committee with assistance from Fish and Game staff.

PROPOSED BY: Middle Yukon River Fish & Game Advisory Committee (OI-F26-186)

Proposal 156

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
...		
Unit 21(D), that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, up to 15 days during March; a person may not take a cow accompanied by a calf	(Season to be announced)	
...		

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The management goal for this antlerless hunt is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose is recently possible because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. This reauthorization will likely improve or better maintain hunting opportunity. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost and the ability to meet intensive management (IM) harvest objectives could be reduced. Slowing the rate of growth in this population will also reduce the likelihood of dramatic shifts in population expansion and contraction.

The IM harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2015–2024 was 388 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not been within the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels and allow subsistence hunters to benefit from the opportunity to harvest cow moose.

Analysis of three trend count areas (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough) within the Kaiyuh Flats in this hunt area demonstrated an increasing trend in moose abundance from 2001 to present. Geospatial population estimate data also increased from 1,897 ($\pm 11\%$) moose in 2011 to 4,116 ($\pm 10\%$) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates from 2004 to 2024 (avg. = 36.1%), with the most recent 5-year twinning rate average (2020-2024) of 27.8%.

The portion of 21D affected by this reauthorization is approximately 21% (2,559 mi²) of Unit 21D (12,093.6 mi²). The department estimates moose abundance in this area at 4,000–4,500 moose, which is approximately 39–44% of the total moose estimated in Unit 21D (10,478 moose ($\pm 1,572$)) in 2024. The current total 21D moose population estimate was above the IM population objective for all of Unit 21D (12,093.6 mi²) of 9,000–10,000 moose.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-017)

Proposal 157

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM816, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM816, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM816. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-203)

Proposal 158

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM817, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM817, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM817.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-204)

Proposal 159

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM818, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM818, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM818. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-206)

Proposal 160

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM820, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM820, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM820.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale (OI-F26-207)

Proposal 161

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM892, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM892, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM892.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale (OI-F26-208)

Proposal 162

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM922, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM922, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM922. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is one of the most accessible moose hunts in Alaska and provides opportunity for Alaskans to affordably fill the freezer on a road system any bull hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-210)

Proposal 163

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

Limit the Non-Resident permit allocation for the Unit 24/25 Moose drawing hunt DM920, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 24/25 Moose drawing hunt DM920, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM920.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is one of the most accessible moose hunts in Alaska and provides opportunity for Alaskans to affordably fill the freezer on a road system any bull hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-209)

Proposal 164

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

Change allocation in moose hunts DM809, DM810and DM811 in 21B to 80% for residents and 20% for non-residents as follows:

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

At the 2026 Southcentral Region board meeting, the board set a precedent of sorts on draw permit allocations when the nonresident allocation was above 20 percent. The board decided that for “trophy” species like mountain goat, nonresidents should receive 20 percent of the available permits and for “meat” animals like elk, nonresidents should receive 10 percent of the permits.

If we were to label the Upper Nowitna moose population as a “trophy” species, then the allocation of permits for this area should be no more than 20 percent going to nonresidents.

We propose to lower the nonresident allocation and raise the resident allocation so we have an 80/20 resident/nonresident split as follows:

DM 810 Resident – 16 permits

DM 809 Nonresident unguided – 1 permit

DM 811 Nonresident must-be-guided – 3 permits

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

Resident/Nonresident Draw Tag Allocation

Upper Nowitna River Moose Hunt Unit 21B

DM 809/810/811

Background: The upper Nowitna River area in Unit 21B within the Nowitna National Wildlife Refuge (NNWR) is known for its “trophy” moose. It became a hot spot for moose hunters and due to concerns too many moose would be taken along the river, the Board of Game made it a draw-only “trophy” moose hunt (DM 810) in the early 2000s within the upper Nowitna River corridor, similar to the Koyukuk moose hunt. The only way a hunter was allowed to keep the moose antlers from the Upper Nowitna River area was if he or she won the DM 810 permit or hunted under a general season OTC tag 2 miles outside the river corridor on either side.

The new DM 810 draw hunt had 20 permits available and was just like other draw hunts in the state where anyone could apply equally for a permit from one pool of tags. Since more residents than nonresidents typically put in for the permit, residents won most of the permits. That wasn’t good for the guide with exclusive guiding privileges in the NNWR, so he put in a proposal at the 2008 Interior Board of Game meeting (Proposal 55) to change the allocation to 50/50 resident/nonresident. But since that alone wouldn’t help him get clients, he also asked the board to make this a must-be-guided moose hunt for all nonresidents.

Part of his argument was that a lot of residents would win that permit but not hunt after they found out the area is hard to access and expensive to fly into. Which is true of a lot of draw permits. But the gist of the proposal was that he wasn’t getting enough clients under the DM 810 draw hunt.

The board ended up passing Proposal 55 in 2008, separating out the DM 810 permits with a 50/50 resident/nonresident permit allocation, 10 permits to residents (DM 810) and 10 to nonresidents, 7 of which were must-be-guided (DM 811), with the remaining 3 going to nonresident unguided (DM 809).

The fact that we have a 50/50 resident/nonresident draw permit allocation, regardless if this is a “trophy” moose population, if the area is expensive or hard to get to, or a certain percentage of residents don’t hunt their permit, is just a slap in the face to resident Alaskans who live here and raise their kids here. **Under no circumstances should we ever allocate half of any draw permits to nonresidents, whether it is considered a “trophy” animal or a meat animal.**

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-096)

Proposal 165

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

Establish a winter registration moose hunt within a portion of the Hammond River drainage of Unit 24A as follows:

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

Establish a winter registration hunt within a portion of the Hammond River drainage of Unit 24A.

.... (22)

Unit 24(A), that portion of the
Dalton Highway Corridor
Management Area, **outside the
Hammond River drainage
downstream from the Canyon
Creek drainage**

RESIDENT HUNTERS:

1 bull by drawing permit; Sept. 1 – Sept 25
up to 70 permits may be issued (General Hunt only) in combination with Unit
25(A), that portion within the
Dalton Highway Corridor Management Area

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or Sept. 5 – Sept. 25
antlers with 4 or more brow
tines on one side by drawing
permit only; up to 70 permits
may be issued in combination
with Unit 25(A), that portion
within the Dalton Highway
Corridor Management Area

**Unit 24(A), that portion
within the Hammond River
drainage upstream and
including the Canyon Creek
drainage**

RESIDENT HUNTERS:

1 bull; or Sept. 1 – Sept 25
(General Hunt only)

RESIDENT HUNTERS:

**1 antlered bull, by registration Dec. 15 – Apr. 15
permit only**

NONRESIDENT HUNTERS: No Open Season

Remainder of Unit 24(A)

RESIDENT HUNTERS:

1 bull Sept. 1 – Sept 25

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or Sept. 5 – Sept. 25
antlers with 4 or more brow
tines on one side

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

Currently, due to the revocation of Public Land Orders (PLO) 5150 and 5180 under PLO 7966 on February 25, 2026 - 2.1 million acres of Bureau of Land Management (BLM) lands in the Dalton Highway Corridor are now State selected lands and no longer under Federal subsistence priority as of March 27, 2026. To allow for subsistence opportunity within Gates of the Arctic National Park, a winter moose hunt is being requested. This additional hunting opportunity is necessary to allow for subsistence utilization of available Federal lands in Gates of the Arctic National Park in Unit 24A because hunting opportunity has been lost on BLM lands.

Opening a winter moose season would provide opportunities for Federally qualified subsistence users to harvest a moose utilizing snowmachines. This would be a contiguous regulatory hunt since there's already a similar hunt in Unit 24B.

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

This proposal was developed during a discussion Koyukuk River Fish & Game Advisory Committee meeting and with ADFG Area Biologists.

PROPOSED BY: Jack Reakoff (OI-F26-180)

Proposal 166

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce Caribou bag limit for Western Arctic Caribou herd in 24B and 24C remainder as follows:

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

Reduce the **BAG LIMIT 4 BULL CARIBOU PER REGULATORY YEAR IN 24B REMAINDER JULY 1 - OCT 1 - NOV 1-JUNE 30**

[FIVE CARIBOU PER DAY HOWEVER CALVES MAY NOT BE TAKEN, BULLS

JULY 1-OCT 14-&-FEB 1-JUNE 30, COWS JULY 15-APRIL 30]

BAG LIMIT 4 BULL CARIBOU PER REGULATORY YEAR IN 24C REMAINDER

JULY 1 -OCT1 - NOV 1- JUNE 30

[FIVE CARIBOU PER DAY HOWEVER CALVES MAY NOT BE TAKEN, BULLS

JULY 1-OCT 14-&-FEB 1-JUNE 30, COWS JULY 15-APRIL 30]

These two GMU units 24B and 24C remainder are within the range of the Western Arctic Caribou herd predominantly. Regulation reduction should include these sub units of GMU 24.

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger

growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

The Western Arctic Caribou Herd population has declined dramatically. The WACH work group is very concerned as I am with excessive cow caribou take is a main driver currently, weather events and predation are additive. I informed the Koyukuk River AC of my concerns to eliminate cow take with a uniform bull bag limit and seasons applied across the WACH Range. The data and social media shows that large numbers of cow harvest it is exceeding sustained yield.

Cow caribou almost never have twins. Cow caribou short yearling that experience hardships like hot summer as a calf, deep snow, rain icing in winter, and late spring will typically not produce its first calf until her fourth birthday. Currently large percentage of recruited cows have lost one year of production, affecting overall recruitment. This weak cohort with a 10 year life span would only have 6 calves at best. Strong cohorts with better conditions will produce at 3 years, or 7 total calves in her life span.

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

I have discussed these issues with the Koyukuk River AC members as I am chairman, Western Interior Regional Advisory Council and other Regions. I discuss caribou management with ADFG managers about what strategies to use to address the current situation with all the Northern Caribou herds. I discuss these issues with Federal management NPS, USFWS, and BLM as well as the Federal Subsistence Board. I talk about these caribou issues with people that travel up the Dalton Highway to hunt the Arctic hunt caribou.

PROPOSED BY: Jack Reakoff

(OI-F26-104)

Proposal 167

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit nonresident sheep hunters in Units 26B and 24A via a draw permit system as follows:

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

Limit nonresident sheep hunters in Units 26B and 24A via a draw permit system.

Unit 26B Remainder and Unit 26B within the Dalton Highway Corridor Management Area Nonresidents

Season Dates: Aug 10 – Sept 20

**Bag Limit: 1 ram with full-curl horn or larger every four regulatory years by draw permit only
DS XXX with up-to 5 permits issued.**

Unit 24A Remainder and Unit 24A within the Dalton Highway Corridor Management Area Nonresidents

Season Dates: Aug 10 – Sept 20

**Bag Limit: 1 ram with full-curl horn or larger every four regulatory years by draw permit only
DS XXX with up-to 5 permits issued.**

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

Continued unlimited nonresident sheep hunting opportunity in units 26B and 24A.

From 2022 – 2025, all federal lands in 26B west of the Sag River and 24A were closed by the Federal Subsistence Board to sheep hunting by all users due to sheep conservation concerns. These areas will be opened again to sheep hunting in the fall of 2026.

Sheep are in significant decline in these areas and the 2025/2026 winter certainly was a bad one for sheep. We believe nonresident sheep hunting opportunity should be limited.

The charts below from ADF&G show sheep harvest data for Units 26B and 24A from 2017-2025, The Department was unable to provide sheep harvest statistics for just the areas on federal lands that were closed to all sheep hunting 2022-2025.

Total resident sheep harvests in Unit 26B from 2017-2025: **61 sheep,**

Total nonresident sheep harvests in Unit 26B from 2017-2025: **63 sheep.**

Total resident sheep harvests in Unit 24A from 2017-2025: **46 sheep.**

Total nonresident sheep harvests in Unit 24A from 2017-2025: **43 sheep.**

all 26B Sheep hunters	Unsuccessful hunters			Successful hunters			Total hunters	
	Nonresidents	Residents		Nonresidents	Residents		Nonresidents	Residents
2017	9	34		6	8		15	42
2018	1	40		11	7		12	47
2019	4	39		7	14		11	53
2020	2	41		9	6		11	47
2021	7	48		10	8		17	56
2022	4	15		4	3		8	18
2023	6	14		7	2		13	16
2024	8	17		5	6		13	23
2025	6	25		4	7		10	32

All 24A Sheep hunters	Unsuccessful			Successful			Total hunters	
	Nonresidents	Residents		Nonresidents	Residents		Nonresidents	Residents
2017	3	39		10	5		13	44
2018	2	42		5	11		7	53
2019	9	49		6	12		15	61
2020	6	39		10	7		16	46
2021	13	42		8	3		21	45
2022	9	6		1	0		10	6
2023	4	4		3	1		7	5
2024	4	10		0	2		4	12
2025	2	8		0	5		2	13

While the number of resident sheep hunters in these units is 2 to 5 times more than nonresident sheep hunters, nonresidents take on average 50% of the total sheep harvest. With sheep in such decline in these areas and fewer legal rams available, residents should have a clear sheep hunting priority to avoid crowding and conflicts and any future closures.

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

Thanks to Department staff for providing the data!

PROPOSED BY: Resident Hunters of Alaska (OI-F26-093)

Proposal 168

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Amend the spring bear baiting season in Units 21B, 21C, 21D, 24B, 24C, 24D, and 25D to open April 1 and close June 30, no change to the fall season (August 1–October 31) as follows:

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

Amend the spring bear baiting season in Units 21B, 21C, 21D, 24B, 24C, 24D, and 25D to open April 1 and close June 30. No change to the fall season (August 1–October 31).

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

The current April 15 opener occurs during spring break-up, when access to remote bait sites is often unsafe or not possible. These units are largely roadless and depend on snowmachine or ski-equipped aircraft access. By mid-April, warming temperatures frequently create overflow, deteriorating ice, and unpredictable travel conditions that limit safe access.

Early April generally provides more stable late-winter conditions, allowing safer and more efficient transport of bait and equipment before break-up. Bears typically emerge from dens in early to mid-May, so this change would not increase harvest opportunity, only allow earlier bait site establishment and improve reliability of operations.

This proposal improves safety, access, and consistency for hunters and guides while maintaining current harvest timing. No negative impacts to bear populations are anticipated.

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

Informal discussions with other area users.

PROPOSED BY: Charles Jagow (OI-F26-085)

Proposal 169

5 AAC 85.060; 84.270. Hunting seasons and bag limits for fur animals; Furbearer trapping.

Extend hunting and trapping for Wolverine to April 30 as follows:

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

Wolverine hunting and trapping season ends April 30.

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

extend hunting and trapping for Wolverine.

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

PROPOSED BY: Gilbert huntington (OI-F26-105)

Northeast Alaska - Units 25A, 25B, 25D, 26B & 26C

Proposal 170

5 AAC 85.025 (a)(19) and (21). Hunting seasons and bag limits for caribou.

Decrease the caribou hunting bag limit for residents in Unit 24A remainder from 10 caribou to 5 bulls, and in Unit 26B remainder from 5 caribou to 5 bulls as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19) ...		
Unit 24(A) Remainder		
RESIDENT HUNTERS: <u>5 bulls</u> [10 CARIBOU]	July 1 – Apr. 30	
NONRESIDENT HUNTERS: 2 bulls		Aug 1 – Sept. 30
(21) ...		
Unit 26(B) Remainder		
RESIDENT HUNTERS: <u>5 bulls</u> [5 CARIBOU]	July 1 – Apr. 30	
NONRESIDENT HUNTERS: 2 bulls		Aug 1 – Sept. 15

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

The 2025 Central Arctic Herd (CAH) population estimate indicated there was a decrease in the population from 2022 (34,642 caribou, 95% CI 32,419–36,866) to 2025 (26,621 caribou, 95% CI

25,466 – 27,775). The 2025 population estimate is below the intensive management objective for this herd of 28,000–32,000 caribou. The CAH range primarily encompasses Units 26B and Unit 24A.

To decrease harvest pressure on the reproductive component of the herd, the department recommends that the bag limits for units 24(A) and 26(B) be changed from any caribou bag limits to a 5 bull only bag limit. At the current population size and trend, there is no longer a harvestable surplus of cow caribou to support the current any caribou bag limits. However, the harvestable surplus of bulls is adequate to support continued bull harvest as long-term estimates indicate bull:cow ratios have remained above the management objective of 40 bulls per 100 cows.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-029)

Proposal 171

5 AAC 85.025 (a)(19) and (21). Hunting seasons and bag limits for caribou.

Create a registration hunt for cow caribou in units 24A and 26B for residents, to allow a limited harvest of cows to be taken when available, with season dates and bag limit to be announced as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
...		
Unit 24(A) Remainder		
RESIDENT HUNTERS: 10 caribou	July 1 – Apr. 30	
<u>Up to 2 cows may be taken by registration permit only, during a season to be announced from July 1 – April 30</u>	<u>TBA</u>	
NONRESIDENT HUNTERS: 2 bulls		Aug 1 – Sept. 30

(21)

...

Unit 26(B) Remainder

RESIDENT HUNTERS:

5 caribou

July 1 – Apr. 30

**Up to 2 cows may be
taken by registration
permit only, during a
season to be announced
from July 1 – April 30**

TBA

NONRESIDENT HUNTERS:

2 bulls

Aug 1 – Sept. 15

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

The 2025 Central Arctic Herd (CAH) population estimate indicated there was a decrease in the population from 2022 (34,642 caribou, 95% CI 32,419–36,866) to 2025 (26,621 caribou, 95% CI 25,466 – 27,775). The 2025 population estimate is below the intensive management objective for this herd of 28,000–32,000 caribou. The CAH range primarily encompasses Units 26B and Unit 24A.

To decrease harvest pressure on the reproductive component of the herd, the department recommends in a separate proposal that the bag limits for units 24(A) and 26(B) be changed from either a 10 caribou or 5 caribou bag limit to a 5 bull only bag limit, which will continue to be administered as a general season harvest ticket hunt. At the current population size and trend, there is no longer a harvestable surplus of cow caribou to support the current any caribou bag limits. However, The CAH population has fluctuated regularly above and below the intensive management objective over the past 25 years. This has resulted in the department seeking regulatory changes to either liberalize or restrict harvest opportunity at most Interior Region Board of Game meetings. This proposal seeks to implement an adaptive regulatory structure for cow caribou to maximize harvest opportunity when harvestable surplus exists or restrict harvest during times of conservation. In addition, a registration permit would allow the department to determine an in-season quota to prevent over-harvest of cows when warranted.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-030)

Proposal 172

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the resident bag limit for caribou in 26B remainder as follows:

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

Reduce the resident **BAG LIMIT 5 BULL CARIBOU PER REGULATORY YEAR IN 26B REMAINDER JULY 1 -OCT 1 - NOV 1-JUNE 30**

[RESIDENTS FIVE CARIBOU JULY 1-APRIL 30]

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger

growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

Decline Central Arctic herd has declined 61% since 2010, 23% since 2022 to 2026.

continued cow caribou harvest is not sustainable at this time. Cow caribou almost never have twins. Cow caribou short yearling that experience hardships like hot summer as a calf, deep snow, rain icing in winter, and late spring will typically not produce its first calf until her fourth birthday. Currently large percentage of recruited cows have lost one year of production, affecting overall recruitment. This weak cohort with a 10 year life span would only have 6 calves at best. Strong cohorts with better conditions will produce at 3 years, or 7 total calves in her life span.

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

I have discussed these issues with the Koyukuk River AC members as I am chairman, Western Interior Regional Advisory Council and other Regions. I discuss caribou management with ADFG managers about what strategies to use to address the current situation with all the Northern Caribou herds. I discuss these issues with Federal management NPS, USFWS, and BLM as well as the Federal Subsistence Board. I talk about these caribou issues with people that travel up the Dalton Highway to hunt the Arctic caribou.

PROPOSED BY: Jack Reakoff (OI-F26-108)

Proposal 173

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for Caribou in 24B remainder as follows:

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

BAG LIMIT 5 BULL CARIBOU PER REGULATORY YEAR IN 24A REMAINDER JULY 1 -OCT 1 - NOV 1-JUNE 30

[RESIDENTS TEN CARIBOU JULY 1-APRIL 30]

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

I would like to address the caribou decline of all four Arctic caribou herds Western Arctic, Central, and Porcupine. Although Teshukpuk herd is stable but not significant in 24A.

GMU 24A remainder caribou can have all four herds present in winter, spring and fall. Western has been west out of this unit recently. Severe weather weakening of these populations, combined with cow harvest and predation.

Currently the Porcupine herd has declined 33% since 2017. Central Arctic herd has declined 61%, These two herds can not support cow harvest and large bag limits with road access.

There are bulls to harvest with a longer season to offset the necessary elimination of cow harvest.

Sustained yield conservation is paramount, as they are an important food resource for Alaskans subsistence use.

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

PROPOSED BY: Jack Reakoff

(OI-F26-106)

Proposal 174

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Change the bag limit for caribou to 5 bulls within the Dalton Highway corridor management area of GMU 25A as follows:

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

WITHIN THE DALTON HIGHWAY CORRIDOR MANAGEMENT AREA GMU 25A RESIDENT BAG LIMIT 5 BULL CARIBOU PER REGULATORY YEAR JULY 1 -OCT 1 - NOV 1-JUNE 30

[RESIDENTS TEN CARIBOU JULY 1-APRIL 30]

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the

tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

GMU 25A caribou can have all four herds present in winter, spring and fall. Western has been west out of this unit recently. Severe weather weakening of these populations, combined with cow harvest and predation.

Currently the Porcupine herd has declined 33% since 2017. Central Arctic herd has declined 61% since 2010, 23% since 2022 to 2026. , These two herds can not support cow harvest and large bag limits with road access.

There are bulls to harvest with a longer season to offset the necessary elimination of cow harvest.

Sustained yield conservation is paramount, as they are an important food resource for Alaskans subsistence use.

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

I have discussed these issues with the Koyukuk River AC members as I am chairman,

Western Interior Regional Advisory Council and other Regions. I discuss caribou management with ADFG managers about what strategies to use to address the current situation with all the Northern Caribou herds. I discuss these issues with Federal management NPS, USFWS, and BLM as well as the Federal Subsistence Board. I talk about these caribou issues with people that travel up the Dalton Highway to hunt the Arctic caribou.

PROPOSED BY: Jack Reakoff

(OI-F26-146)

Proposal 175

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Central Arctic Caribou Herd Reduce nonresident bag limit to one bull with a season Aug 1 – Sept 15. Eliminate the opportunity for residents to take cows as follows:

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

Reduce nonresident bag limit to one bull with a season Aug 1 – Sept 15. With the herd in decline and increasing nonresident participation, nonresidents should be limited to 1 bull only.

Eliminate the opportunity for residents to take cows. With the herd in decline, we should not allow any cow harvests until the population increases. Even a limited cow harvest can affect growth of the herd.

26B Remainder Caribou

Resident season July 1 – April 30

Bag Limit: 5 Bulls

Nonresident season Aug 1 – Sept 15

Bag Limit: 1 Bull

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

Decline in Central Arctic Caribou Herd

Increasing Nonresident Participation

Crowding Issues Along Rivers

The 2025 photocensus estimate of Central Arctic Herd (CAH) caribou showed a population of 26,600 animals, a decline of 8,000 caribou from the previous estimate in 2022. The current

population estimate is below the Intensive Management (IM) population objective of 28,000 – 32,000 animals.

The chart below from ADFG shows a significant increase in the number of nonresident hunters hunting the Central Arctic caribou herd in Unit 26B.

Year	Number of hunters	
	Nonresidents	Residents
2010	373	1424
2011	278	1361
2012	310	1244
2013	461	1087
2014	465	1029
2015	472	842
2016	351	794
2017	266	358
2018	198	310
2019	256	329
2020	209	501
2021	457	479
2022	570	580
2023	753	799
2024	1034	1127
2025	1001	

Along with increasing nonresident hunters, there has been an increase in the number of transporters catering to nonresident hunters, with airboat transporters flooding the Ivishak and other rivers with hunters, resulting in crowding and conflicts and numerous complaints.

Residents have a much longer season (July 1 – April 30) than nonresidents and are currently allowed to take five caribou, one of which may be a cow. In 2024 (data not available for 2025 yet) 228 cows were taken from the declining CAH by residents.

Nonresidents have an Aug 1 – Sept 15 season and a 2-bull bag limit. As the chart below shows, nonresidents harvested 50% of the CAH in 2024

residency	Number of caribou taken/hunter during 2024						
	0	1	2	3	4	5	total caribou
Nonresident hunters	497	501	36				
caribou taken by nonresidents		501	72				573
resident hunters	716	290	92	22	2	5	
caribou taken by residents		290	184	66	8	25	573

The CAH is important for feeding Alaskans and is below the IM population objective. There should be no cow harvests allowed until the herd increases. The nonresident bag limit should be reduced.

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

Thanks to Department staff for the charts and data!

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-091)

Proposal 176

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Shorten the nonresident caribou season in GMU 26B to Aug 1-30th as follows:

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

I recommend shortened the Non resident season to Aug 1-30th. This would shorten the season, take and over-access issue.

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

There are two issues with 26B. One is the declining herd numbers between the porcupine herd and Central arctic herd. The second is an access issue with Nonresidents coming up in non-regulated amounts. This puts additional strain on the caribou herd and pushes the herd away from access from residents.

ADFG photocensus:

(Fairbanks) A photocensus of the Porcupine caribou herd (PCH) was completed on July 4, 2025, and resulted in a population estimate of 143,000 caribou. The following day, a photocensus of the Central Arctic caribou herd (CAH) was completed and resulted in a population estimate of 26,600 caribou.

Both herds have declined since their previous photocensus estimates and the declines were expected based on annual monitoring of adult survival, parturition (pregnancy) rates, and calf survival.

Porcupine caribou herd summary The 2025 PCH photocensus estimate of 143,000 caribou is lower than the previous photocensus in 2017. The 2017 photocensus estimate was 218,000 caribou, which was the most caribou ever estimated in this herd since monitoring began in the 1970s. This herd has experienced periods of growth and decline since photocensus efforts began. In 1979, the herd was around 106,000 caribou, grew to 178,000 in 1989, declined to 123,000 in 2001, and then increased to 218,000 in 2017. This current period of decline is steeper than was observed during the decline in the 1990s. A reduction in adult survival, calf survival, and other population metrics

since 2017 supports the photocensus results that the herd is in a decline. Future photocensus population estimates and monitoring of the herd will continue to document the nature and duration of this decline. Central Arctic herd summary The 2025 CAH photocensus estimate of 26,600 is lower than the previous photocensus in 2022 which estimated 34,600 caribou. Previously, the CAH experienced a population peak in 2010 at 68,400 caribou and then declined to 22,600 in 2016. Similar to the PCH, reduced adult survival, calf survival, and parturition rates support the photocensus results indicating that the CAH is no longer growing and has declined since 2022.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-005)

Proposal 177

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the nonresident caribou hunting in GMU 26B to a draw tag system as follows:

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

N- 26B- Draw Tag- Aug 1- Sept 15

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

There are two issues with 26B. One is the declining herd numbers between the porcupine herd and Central arctic herd. (adfg photocensus information below) The second is an access issue with Nonresidents coming up in non-regulated amounts. This puts additional strain on the caribou herd and pushes the herd away from the DHCMA road access. This would also allow increased revenue for the department with draw hunt applications.

ADFG photocensus:

(Fairbanks) A photocensus of the Porcupine caribou herd (PCH) was completed on July 4, 2025, and resulted in a population estimate of 143,000 caribou. The following day, a photocensus of the Central Arctic caribou herd (CAH) was completed and resulted in a population estimate of 26,600 caribou.

Both herds have declined since their previous photocensus estimates and the declines were expected based on annual monitoring of adult survival, parturition (pregnancy) rates, and calf survival.

Porcupine caribou herd summary The 2025 PCH photocensus estimate of 143,000 caribou is lower than the previous photocensus in 2017. The 2017 photocensus estimate was 218,000 caribou, which was the most caribou ever estimated in this herd since monitoring began in the 1970s. This

herd has experienced periods of growth and decline since photocensus efforts began. In 1979, the herd was around 106,000 caribou, grew to 178,000 in 1989, declined to 123,000 in 2001, and then increased to 218,000 in 2017. This current period of decline is steeper than was observed during the decline in the 1990s. A reduction in adult survival, calf survival, and other population metrics since 2017 supports the photocensus results that the herd is in a decline. Future photocensus population estimates and monitoring of the herd will continue to document the nature and duration of this decline. Central Arctic herd summary The 2025 CAH photocensus estimate of 26,600 is lower than the previous photocensus in 2022 which estimated 34,600 caribou. Previously, the CAH experienced a population peak in 2010 at 68,400 caribou and then declined to 22,600 in 2016. Similar to the PCH, reduced adult survival, calf survival, and parturition rates support the photocensus results indicating that the CAH is no longer growing and has declined since 2022.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-006)

Proposal 178

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the nonresident caribou hunting in GMU 26B to a draw tag system with three separate hunts as follows:

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

N- 26B- Draw Tag- Split into 3 Separate tags Aug 1- Aug 15 maximum 20

Aug 16- Aug 31 Maximum 20

Sept 1- Sept 15 Maximum 20

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

There are two issues with 26B. One is the declining herd numbers between the porcupine herd and Central arctic herd. (adfg photocensus information below) The second is an access issue with Nonresidents coming up in non-regulated amounts. This puts additional strain on the caribou herd and pushes the herd away from the DHCMA road access. This would also allow increased revenue for the department with draw hunt applications.

ADFG photocensus:

(Fairbanks) A photocensus of the Porcupine caribou herd (PCH) was completed on July 4, 2025, and resulted in a population estimate of 143,000 caribou. The following day, a photocensus of the

Central Arctic caribou herd (CAH) was completed and resulted in a population estimate of 26,600 caribou.

Both herds have declined since their previous photocensus estimates and the declines were expected based on annual monitoring of adult survival, parturition (pregnancy) rates, and calf survival.

Porcupine caribou herd summary The 2025 PCH photocensus estimate of 143,000 caribou is lower than the previous photocensus in 2017. The 2017 photocensus estimate was 218,000 caribou, which was the most caribou ever estimated in this herd since monitoring began in the 1970s. This herd has experienced periods of growth and decline since photocensus efforts began. In 1979, the herd was around 106,000 caribou, grew to 178,000 in 1989, declined to 123,000 in 2001, and then increased to 218,000 in 2017. This current period of decline is steeper than was observed during the decline in the 1990s. A reduction in adult survival, calf survival, and other population metrics since 2017 supports the photocensus results that the herd is in a decline. Future photocensus population estimates and monitoring of the herd will continue to document the nature and duration of this decline. Central Arctic herd summary The 2025 CAH photocensus estimate of 26,600 is lower than the previous photocensus in 2022 which estimated 34,600 caribou. Previously, the CAH experienced a population peak in 2010 at 68,400 caribou and then declined to 22,600 in 2016. Similar to the PCH, reduced adult survival, calf survival, and parturition rates support the photocensus results indicating that the CAH is no longer growing and has declined since 2022.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-015)

Proposal 179

5 AAC 85.025; 92.069. Hunting seasons and bag limits for caribou; Special provisions for moose and caribou drawing permit hunts.

Require nonresident caribou hunters that are not accompanied by a guide or a resident second degree of kindred to participate in a limited draw permit system as follows:

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

GMU 26B Nonresident Caribou Draw Permit System

Proposed Regulatory Action

Place nonresident caribou hunters NOT using a registered guide, and NOT accompanied by resident second-degree of kindred ON A DRAW TAG ALLOCATION IN GMU 26B

Overview of the Proposal

This proposal would place nonresident caribou hunters NOT using a registered guide, and NOT accompanied by resident second-degree of kindred in Game Management Unit 26B on a limited draw permit system.

Nonresident caribou hunters using a registered guide, or accompanied by resident second-degree of kindred in GMU 26B would still be on a harvest ticket permit structure.

Under this structure:

- Up to 250 permits for non resident caribou hunters NOT using a registered guide, and NOT accompanied by resident second-degree of kindred would be available annually
- Season dates: August 1 – September 15
- Bag limit: One bull caribou per permit holder

This framework establishes a reasonable cap on total nonresident participation while still maintaining opportunity for nonresident hunters.

Proposal Justification

Increasing Nonresident Hunting Pressure

Harvest data used in this proposal was obtained from the Alaska Department of Fish and Game (ADFG) and compares resident and nonresident hunting statistics within Unit 26B. ADFG staff were able to provide nonresident harvest and participation data for the full fifteen-year period from 2010–2025. However, resident harvest data for 2025 was not yet finalized at the time this proposal was written because the spring season was still ongoing. According to ADFG staff, preliminary 2025 resident data is tracking similarly to 2024 levels. Therefore, statistical comparisons in this proposal use nonresident data from 2010–2025 and resident data from 2010–2024.

Based on preliminary data from the Alaska Department of Fish and Game, nonresident hunting pressure in Unit 26B has steadily increased in recent years. Since 2021, nonresident hunters have accounted for nearly 50 percent of the total hunting pressure in the unit.

Nonresident Share of Total Hunting Pressure – GMU 26B

Year	Percent of Total Hunting Pressure (Nonresident)
2010	20.75%
2011	16.96%
2012	19.94%

2013	29.78%
2014	31.12%
2015	35.92%
2016	30.65%
2017	42.62%
2018	38.97%
2019	43.76%
2020	29.40%
2021	48.82%
2022	49.56%
2023	48.52%
2024	47.80%

This increase has resulted in:

- Noticeable overcrowding
- Increased competition between resident and nonresident hunters
- Concentration of hunting pressure along road and river corridors
- Decreased Alaska resident hunter satisfaction

As a result, many Alaska residents are experiencing diminished hunt quality and increased difficulty harvesting caribou for their families.

If average resident hunter participation remains around 1,000 hunters* (a level reached in only 6 of the 14 years from 2010–2024, Meaning the percentage of nonresident hunting pressure will likely be higher than listed), the proposed permit allocation would effectively cap unguided nonresident hunters at approximately 20% of total hunting pressure each year in Unit 26B.

Importance of Accessible Caribou Hunting for Alaska Residents

Across Alaska, ungulate populations accessible from the road system or reachable by reasonable boat travel in many regions of the state have declined and are struggling. As a result, the remaining accessible hunting opportunities are becoming increasingly important for resident hunters who rely on wild game to feed their families.

Unit 26B and the Central Arctic Caribou Herd (CACH) represent one of the few remaining opportunities for Alaska residents to harvest caribou without drawing a limited permit or paying extremely expensive transporter fly-in costs to access remote areas. Because of this, Unit 26B is becoming an increasingly important food security resource for Alaska residents. Due to unlimited nonresident opportunity and growing demand, many transporters now only offer flat-rate drop hunts at premium prices rather than traditional hourly billing for flight time — a cost structure that the vast majority of Alaska residents cannot reasonably afford.

Effects of Unlimited Nonresident Opportunity

Currently, several factors are contributing to increasing pressure in Unit 26B:

- Unlimited nonresident hunting opportunity
- A liberal nonresident bag limit
- Increasing numbers of transporters, hunt planners, and other businesses catering to DIY nonresident hunters

These factors have led to a substantial rise in nonresident participation, particularly in areas that are road-accessible or boat-accessible. In these areas, hunters are often concentrated into relatively small portions of the unit.

When nonresident opportunity remains unlimited, it can also create a feedback cycle in which increased numbers of nonresident hunters attract additional transporters and commercial services, which in turn make the hunt even more accessible to additional nonresident hunters. As services expand and participation grows, hunting pressure can continue to increase year after year.

Over time, this dynamic has accelerated hunting pressure and intensified crowding in the most accessible portions of the unit. Without reasonable limits on participation, these trends will likely continue to worsen.

Hunter Density and Declining Hunt Quality

While the Central Arctic Caribou Herd may still support harvest biologically, excessive hunter density can significantly reduce hunt quality, hunter satisfaction, and opportunity for resident hunters.

High hunter density can result in:

- Reduced ability for hunters to locate animals
- Increased competition and crowding among hunters in accessible areas
- Greater likelihood of user conflicts

When participation levels become so high that crowding and competition prevent many residents from having a quality hunt, it becomes appropriate to evaluate and implement management tools that help restore balance.

Herd Status and Proactive Management

Recent population surveys indicate that the Central Arctic Caribou Herd is currently estimated at approximately 26,700 animals, a decline from the previous estimate of approximately 34,600 animals in 2022.

Taking proactive steps to manage participation levels before more serious conservation concerns arise is a responsible and precautionary approach to wildlife management. Establishing reasonable limits on nonresident participation would demonstrate that the Board of Game is willing to act proactively in the interest of long-term herd sustainability, while also recognizing the importance of maintaining hunt quality and hunter satisfaction for Alaska residents who rely on these opportunities to harvest wild food for their families.

Precedent for This Management Approach

A similar management structure already exists in Game Management Units 1, 2, and 3 for black bear hunting. In those units, Alaska experienced a substantial increase in DIY nonresident hunters and transporter services, creating rapidly increasing hunting pressure.

In that situation, land managers and regulatory agencies could not effectively regulate the expanding transporter sector, which allowed participation to increase quickly as additional services began catering to DIY nonresident hunters. Guided hunting activity, however, was already regulated through land manager permitting systems, and hunting by Alaska residents and nonresidents accompanied by a resident second-degree of kindred was not identified as a source of the increasing pressure concerns.

As a result, the Board of Game implemented a draw permit system specifically for nonresident hunters NOT using a registered guide and NOT accompanied by a resident second-degree of kindred. This regulatory structure allowed managers to place reasonable limits on the segment of hunters responsible for the rapid increase in participation while still maintaining opportunity for guided hunters and traditional resident-family hunting arrangements.

The same underlying conditions now exist in Unit 26B, where rapidly increasing participation by DIY nonresident hunters—often facilitated by transporters and hunt-planning services—is contributing to rising hunting pressure, user conflicts, and decreased hunter satisfaction. Implementing a similar regulatory structure in Unit 26B would follow an established management approach that has already been adopted by the Board of Game in other regions of Alaska when faced with comparable circumstances.

Benefits of a Limited Draw System

Placing DIY nonresident hunting opportunity on a limited draw permit system with a one-bull bag limit represents a reasonable and balanced management action.

This approach would:

- Maintain nonresident hunting opportunity
- Establish a clear cap on nonresident participation
- Reduce crowding in heavily used areas
- Minimize user conflicts between hunters
- Improve overall hunt quality and hunter satisfaction for Alaska residents

Second degree of kindred and Guided Hunting Justification

Maintaining nonresident caribou hunters using a registered guide or accompanied by a resident second-degree of kindred on a harvest ticket system would ensure that these hunters continue to have reasonable opportunity to hunt while the primary source of increasing participation—unguided nonresident hunters—would be managed through a draw permit structure.

Preliminary data from the Alaska Department of Fish and Game indicates that, on average, fewer than 30 guided nonresident caribou hunters participate in Unit 26B annually, representing a very small and consistent portion of overall hunting participation within the unit.

Three federal guide concessions on the Arctic National Wildlife Refuge in GMU 26B — ARC 10, ARC 9, and ARC 6 — operate within the area affected by this proposal, and portions of Gates of the Arctic National Preserve may also support guided hunting activity. These federally authorized guiding operations represent a relatively small and defined portion of overall hunting activity in the unit and are not the primary drivers of the increasing nonresident pressure and crowding concerns addressed by this proposal. Hunting guides operating on these federal lands already have limits on the numbers of hunters they can take each year put in place the federal land manager.

Because guided hunters and nonresidents hunting with resident family members typically represent a smaller and more controlled segment of overall hunting participation, maintaining harvest ticket opportunity for these hunters would allow these traditional hunting arrangements to continue while the draw permit system focuses on moderating the rapidly increasing participation of unguided nonresident hunters.

Additionally:

- Transporters and other businesses catering to DIY nonresident caribou hunters would still be able to offer their services to significant pool of nonresident draw permit holders

- These businesses would also still be able to provide and offer services to Alaska residents

Intent of the Proposal

The intent of this proposal is not to eliminate nonresident hunting opportunity. Rather, the goal is to:

- Implement a reasonable management structure
- Balance opportunity among user groups
- Reduce excessive crowding in accessible areas and improve hunter satisfaction
- Protect the ability of Alaska residents to harvest caribou for their families

By proactively managing DIY nonresident participation through a draw permit system, the Board of Game can help ensure that Unit 26B remains a sustainable and high-quality hunting opportunity for current and future generations of Alaskans while still allowing nonresident hunters to participate in a fair and regulated manner.

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

Overcrowding, user conflict, and decreasing hunter satisfaction in Unit 26b for caribou hunting.

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

Yes this proposal was discussed with numerous other Alaska residents, hunting guides in 26B, and was supported by the Mat Su Valley AC.

PROPOSED BY: Grant Kopplin

(OI-F26-026)

Proposal 180

5 AAC 92.510. Areas closed to hunting.

Require archery hunters along the Dalton Highway in Unit 26B to be a minimum distance from the edge of the road; 5 miles for rifle hunters and 100 yards for archers during August and September as follows:

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

I propose that the board adopt regulations that archery hunters, like rifle hunters, are required to be a minimum distance from the edge of the road; 5 miles for rifle hunters and 100 yards for archers. The regulatory change for archery would only be in effect during the peak time for hunting from highway vehicles, August and September. This change would encourage hunters to use designated parking areas rather than parking wherever is most convenient to the Caribou they are following with their vehicles. This change would also make it illegal for archery hunters using highway vehicles from shooting from areas close to the road, like roadside ditches, which

some view as a practice inconsistent with fair chase. My conversations with state troopers indicate that this would be a clear, enforceable change.

Possible new wording of regulation: Archery hunters in GMU 26B must be at least 100 yards from the edge of the Dalton Highway when actively shooting at any game species during August and September.

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

I would like the board to address safety concerns associated with Caribou hunters using highway vehicles along the Dalton Highway in Unit 26B. Data from the ADF&G shows that between 2010 and 2024 the total number of hunters (residents and non-residents) using highway vehicles in this GMU has increased from 1033 to 1219. The increase is particularly notably during August and September when most hunt this area.

Personal observations after hunting GMU 26B since 1992 and conversation with individuals from the ADF&G, DOT, trucking companies, the Alaska State Troopers, and other hunters all indicated that incidents between vehicular traffic on the Dalton and hunters in highway vehicles, particularly archery hunters, are increasing. Without setbacks, like are in place for rifle hunters, archery hunters are more likely to park along the highway in unsafe ways to gain quick access to Caribou.

In addition to safety concerns, others expressed concerns about fair chase and the quality of the hunting experience when hunters are shadowing Caribou in their vehicle and then jumping out for a quick shot from a roadside ditch.

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

I talked with ADF&G biologists, DOT employees with oversight for the Dalton Highway, trucking companies using the Dalton Highway, and the Alaska State Troopers. I presented this proposal to the Fairbanks AC on 18 March 2026 and I subsequently amended the proposal based on the feedback I received at that meeting.

PROPOSED BY: Mark Lindberg (OI-F26-041)

Proposal 181

5 AAC 92.510. Areas closed to hunting.

Create a quarter mile set back in GMU 26B along the Dalton Highway right of way Boundary during the non-resident archery hunting season as follows:

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

Within Game Management Unit 26B, no person may release an arrow at any game animal, or position themselves to release an arrow at any game animal, *within one-quarter (1/4) mile of the Dalton Highway right-of-way boundary during the Non Resident season.*

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

Bow hunting is currently permitted to the Dalton Highway right-of-way in Unit 26B. The corridor sees daily heavy commercial traffic, and federal Executive Order 14153 has opened 2.1 million acres along the Dalton to expanded energy development, with a projected increase in truck traffic. Tourist use is also increasing annually.

Current regulations place active bow hunting and high-volume industrial and tourist traffic in the same narrow corridor simultaneously. This creates a public safety conflict and elevated wounding, as shots from the road do not allow for proper field assessment. A 1/4-mile setback establishes a clear, enforceable buffer between active hunting and road traffic. It reduces wounding, improves safety for all corridor users, and is specific, measurable, and enforceable by existing personnel with no additional staffing or infrastructure required. Increased industrial traffic under current federal development policy will intensify this conflict if no action is taken.

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

I worked with F&G and spoke to other truckers on the haul road to determine a potential solution to the problem at hand.

PROPOSED BY: James Haveron (OI-F26-107)

Proposal 182

5 AAC 92.530. Management areas.

Establish a Central Arctic Management Area (CAMA) within Game Management Unit 26B as follows:

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

SUMMARY OF PROPOSAL

This proposal would create a new regulatory management area within Game Management Unit 26B called the Central Arctic Management Area (CAMA) and place nonresident caribou hunters NOT using a registered guide, and NOT accompanied by a resident second-degree of kindred, ON A DRAW TAG ALLOCATION within both the Central Arctic Management Area (CAMA) and the Dalton Highway Corridor Management Area (DHCMA).

Under this proposal:

- Up to 100 total nonresident draw permits would be issued annually (DCXXX)
- Bag limit: 1 bull caribou
- Season: August 1 – September 15
- Hunt area: All lands encompassed by the DHCMA and the CAMA within 26B

This structure establishes a reasonable cap on nonresident participation in the most accessible portions of Unit 26B while maintaining nonresident opportunity. It is intended to reduce crowding, minimize user conflicts, and increase hunter satisfaction. Nonresident Caribou hunters would still be able to hunt caribou with a harvest ticket under state regulations in 26B remainder.

WHAT WOULD THE PROPOSAL DO?

This proposal would establish the Central Arctic Management Area (CAMA) within Game Management Unit 26B. The CAMA is specifically designed to encompass the river systems accessible from the Dalton Highway that are heavily relied upon by Alaska residents. These river corridors represent the only practical opportunity for residents to travel beyond the road system without the use of an aircraft and are critical travel routes for those attempting to meet subsistence needs.

These drainages have been extensively utilized by residents for generations and function as the primary access network in this region. It is important that all river systems that are potentially accessible by boat or airboat are included within the CAMA to ensure that nonresident hunting pressure does not simply shift into adjacent, unregulated areas.

The upstream navigability points identified in this proposal were intentionally selected as reasonable high-water limits of motorized access. This approach ensures that the regulatory boundary remains effective under varying conditions and prevents the displacement of hunting pressure into areas that could otherwise still be reached by boat during favorable conditions.

Area Description

- The CAMA would consist of river corridors accessible by jet boat or airboat from the Sagavanirktok River and its tributaries
- The CAMA would begin where the listed drainages exit the DHCMA and extend to the defined navigability points
- Boundaries would extend 5 miles outward from each bank of included rivers and tributaries
- This creates a 10-mile-wide corridor along these drainages outside the DHCMA

Upstream Navigability Points (CAMA Boundary Definition)

River / Tributary	Upstream Navigability Point (Lat/Long)	Notes
Sagavanirktok River	68°29'52.93"N, 149° 0'31.03"W	Upstream navigability point

River / Tributary	Upstream Navigability Point (Lat/Long)	Notes
Ribdon River	68°38'25.01"N, 148°15'59.93"W	Upstream navigability point
Lupine River	68°47'33.87"N 148° 6'36.78"W	Upstream navigability point
Ivishak River	69° 0'41.30"N 147°20'25.09"W	Upstream navigability point
Saviukviayak River	68°50'39.74"N, 147°58'20.32"W	Upstream navigability point
Echooka River	69°7'20.51"N, 147°3'31.65"W	Upstream navigability point
Sagavanirktok River (Downstream)	70°14'31.69"N, 147°50'0.22"W	Northern extent to Arctic Ocean. This would encompass the area accessible by boat outside of the Deadhorse closed area.

*These points represent the reasonable upstream extent of motorized boat access and define the upstream and downstream boundaries of the CAMA corridors. *

Boundary Integration

- Where CAMA overlaps with the DHCMA or other CAMA corridors, the areas would:
 - Merge and function as a single management area for nonresident draw permits
 - Retain existing regulations specific to each area
- Key distinction:
 - DHCMA: Bow-only restriction remains
 - CAMA: Standard weapon regulations apply

Nonresident Hunter Access Options

Successful permit holders may:

- Hunt along the Dalton Highway within the DHCMA, or
- Access river corridors within the CAMA using:
 - Transporter services
 - Boat rentals
 - Personal watercraft

This maintains flexibility for nonresident hunters while ensuring participation remains limited and predictable.

WHAT ARE THE BENEFITS OF THE PROPOSAL?

1. Addresses Increasing Nonresident Pressure

Preliminary Alaska Department of Fish and Game data shows nonresident hunting pressure in Unit 26B has steadily increased and has accounted for nearly 50% of total hunting pressure since 2021.

This increase is most evident in areas accessible by road and boat, where hunters are concentrated into relatively small portions of the unit.

Hunter Participation Trends by Access Type

Year	Nonresident (Boat/Airboat)	Nonresident (Highway Access)	Resident (Boat/Airboat)	Resident (Highway Access)
2021	131	202	66	353
2022	177	247	101	416
2023	266	331	180	529
2024	346	456	229	763
2025	295	448	N/A	N/A

Note: 2025 resident data was not available at the time of this proposal. ADF&G indicates participation is tracking within historical averages.

These trends clearly demonstrate the rapid increase in nonresident participation—particularly in the most accessible areas. Prior to 2021, available data consistently showed significantly more resident hunters than nonresident hunters utilizing boats and airboats for access. In recent years, this trend has shifted, reflecting a sharp increase in do-it-yourself (DIY) nonresident hunters, many of whom rely on transporter services. Highway-access participation by nonresidents has also increased substantially and is now approaching resident participation levels, which historically did not occur. As a result, many Alaska residents are beginning to abandon these areas and the associated subsistence opportunities due to increasing crowding and pressure from nonresident hunters.

Protects Resident Access to Critical Hunting Areas

The Dalton Highway and Sagavanirktok River system represent some of the most accessible caribou hunting opportunities in northern Alaska.

These areas are heavily relied upon by Alaska residents who:

- Do not have the ability to fly into remote areas
- Depend on these accessible corridors for food security

Unit 26B remains one of the few areas where residents can harvest caribou without:

- Drawing a permit
- Paying significant costs for fly-in access

Addresses the Importance of Accessible Caribou Hunting for Alaska Residents

Across Alaska, ungulate populations accessible from the road system or reachable by reasonable boat travel have declined and are struggling. As a result, the remaining accessible hunting opportunities are becoming increasingly important for resident hunters who rely on wild game to feed their families.

Unit 26B and the Central Arctic Caribou Herd (CACH) represent one of the few remaining opportunities for Alaska residents to harvest caribou without drawing a limited permit or paying extremely expensive transporter fly-in costs to access remote areas. Due to unlimited nonresident opportunity and growing demand, many air transporters now offer flat-rate drop hunts at premium prices rather than traditional hourly billing for flight time—a cost structure that the vast majority of Alaska residents cannot reasonably afford.

Because of this, Unit 26B is becoming an increasingly important food security resource for Alaska residents, particularly those who depend on accessible, lower-cost hunting opportunities to provide meat for their families.

Addresses the Effects of Unlimited Nonresident Opportunity and Hunter Density

Several factors are contributing to increasing pressure in Unit 26B:

- Unlimited nonresident hunting opportunity
- A liberal nonresident bag limit
- Increasing numbers of transporters, hunt planners, and other businesses catering to DIY nonresident hunters

These conditions have led to a substantial rise in nonresident participation, particularly in road- and boat-accessible areas where hunters are concentrated into relatively small portions of the unit.

When nonresident opportunity remains unlimited, it creates a feedback cycle in which increasing numbers of hunters attract additional transporters and commercial services, which in turn make these hunts even more accessible to additional nonresident hunters. As services expand and participation grows, hunting pressure can continue to increase year after year.

Over time, this dynamic accelerates hunting pressure and intensifies crowding in the most accessible portions of the unit. Without reasonable limits on participation, these trends will likely continue to worsen.

While the Central Arctic Caribou Herd may still support harvest biologically, excessive hunter density can significantly reduce hunt quality, hunter satisfaction, and opportunity for resident hunters.

High hunter density can result in:

- Reduced ability for hunters to locate animals
- Increased competition and crowding among hunters in accessible areas
- Greater likelihood of user conflicts

When participation levels become high enough that crowding and competition prevent many residents from having a quality hunt, it becomes appropriate to implement management tools that restore balance. This proposal directly addresses these issues by placing reasonable limits on the segment of hunters driving the majority of increased pressure.

Applies Proven Wildlife Management Principles

Across North America, wildlife managers recognize that hunter density—not just population levels—affects hunt quality and opportunity.

In highly accessible areas, limited entry systems are commonly used to:

- Maintain reasonable hunter density
- Preserve hunt quality
- Ensure fair distribution of opportunity

Applying this approach in Unit 26B aligns with widely accepted management practices.

Provides Proactive, Responsible Management

Recent surveys indicate the Central Arctic Caribou Herd has declined since its 2022 estimate of approximately 34,600 animals.

While the herd may still support additional bull caribou harvest, these trends support taking measured, proactive management steps. This proposal is not a reactionary restriction, but a forward-looking framework that helps ensure long-term sustainability and improve several issues such as overcrowding, declining hunter satisfaction, and declining hunt quality.

Establishes a Clear and Flexible Management Framework

Creating the CAMA provides:

- A clearly defined regulatory management area

- A framework for future adjustments if needed
- Improved ability for ADF&G and the Board of Game to manage pressure in accessible areas

While initially complex, this structure simplifies long-term management. The Alaska Department of Fish and Game GIS section would be responsible for developing the official regulatory boundaries for the CAMA. ADF&G GIS staff were contacted and provided an overview of the proposed area, and they indicated that mapping and implementing these boundaries is feasible and well within their capabilities.

Manages the Entire Accessible Landscape as One System

The Dalton Highway corridor and Sagavanirktok River system function as a single accessible hunting landscape.

Managing only one of these areas would likely shift pressure to the other, increasing crowding elsewhere.

This proposal manages both together to:

- Prevent displacement of pressure
- Maintain balance across the system

Maintains Opportunity While Establishing a Cap

This proposal does not eliminate nonresident hunting opportunity.

Instead, it:

- Maintains meaningful access for nonresidents
- Establishes a predictable cap on participation
- Balances nonresident hunting pressure in areas heavily utilized by residents

Maintains Appropriate Opportunity for Guided and Family-Based Hunting

This proposal intentionally allows nonresident caribou hunters who are using a registered guide, as well as nonresident hunters accompanied by a resident second-degree of kindred, to continue hunting within the CAMA and DHCMA with a harvest ticket.

Much of the land encompassed by the proposed CAMA falls within federal ANWR guide use areas ARC 09 and ARC 10, where guiding activity is already subject to strict federal oversight and limitations on the number of clients that can be taken annually. As a result, guided hunting activity in these areas is limited, regulated, and predictable, and is not a primary driver of increased hunting pressure or user conflicts.

Maintaining this opportunity ensures that existing guide operations can continue to operate within their authorized areas and continue to provide services to an already limited number of

clients without disruption. This is consistent with current land management frameworks and avoids unintended impacts to federally regulated guiding systems.

Similarly, nonresident hunters accompanied by a resident second-degree of kindred represent a very small and consistent portion of overall hunting pressure. These hunts are family-based, occur at a limited scale, and are not contributing to the increasing crowding and competition observed in accessible areas.

The primary source of increased pressure and conflict in Unit 26B is the rapid growth in do-it-yourself (DIY) nonresident hunting, particularly in areas accessible by road and boat. By focusing the draw permit structure specifically on this segment of hunters, the proposal directly addresses the root cause of user conflicts while avoiding unnecessary restrictions on guided and family-based hunting.

A similar management structure already exists in Southeast Alaska for black bear hunting in Game Management Units 1, 2, and 3. In those units, Alaska experienced a substantial increase in DIY nonresident hunters and transporter services, resulting in rapidly increasing hunting pressure. Land managers and regulatory agencies could not effectively regulate the expanding transporter sector, while guided hunting activity was already controlled through land manager permitting systems and resident and second-degree-of-kindred hunting was not identified as a driver of the problem.

In response, the Board of Game implemented a draw permit system specifically for nonresident hunters NOT using a registered guide and NOT accompanied by a resident second-degree of kindred. This approach allowed managers to place reasonable limits on the segment of hunters responsible for the rapid increase in participation while maintaining opportunity for guided hunters and traditional resident-family hunting arrangements. The same underlying conditions now exist in Unit 26B, and applying this proven structure follows an established and effective management approach already adopted by the Board of Game.

Outside of the ANWR guide use areas, there is currently little to none known guided hunting occurring on the state land within the DHCMA and proposed CAMA. While these lands are state-managed and guiding could potentially expand in the future, any such increase would be identifiable and addressable. By establishing the CAMA and associated regulatory framework now, the Board of Game would have a clear and effective mechanism already in place to implement additional management tools if guided pressure on state land within the DHCMA and CAMA were to emerge as a concern. This ensures that future issues could be addressed in a targeted and efficient manner without requiring a complete restructuring of regulations.

CONCLUSION

This proposal represents a balanced and practical approach to managing one of Alaska's most important and accessible caribou hunting areas.

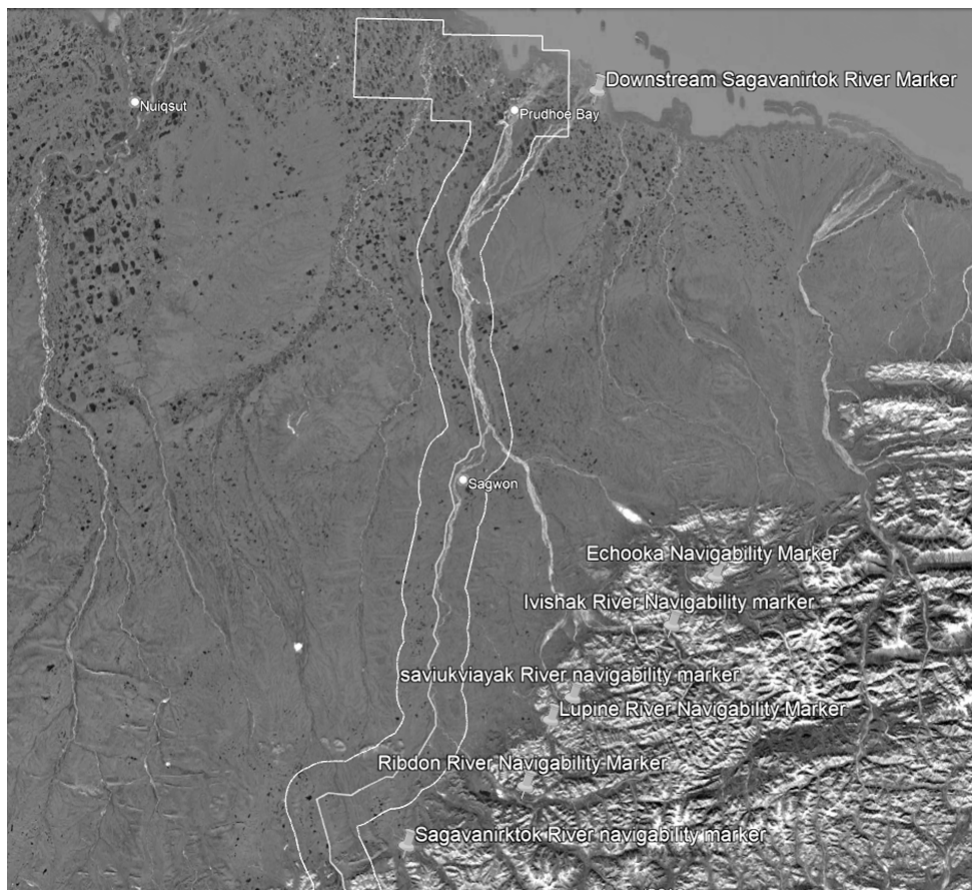
By creating the CAMA and placing nonresident hunting opportunity within the CAMA and DHCMA on a limited draw permit system, the Board of Game can:

- Reduce crowding and user conflicts
- Protect resident hunting opportunity
- Increase hunter satisfaction
- Ensure long-term usability of these areas

At the same time, nonresident hunters would continue to have fair and regulated access.

This approach ensures that Unit 26B remains a viable and accessible hunting opportunity for current and future generations of Alaskans.

PICTURE SHOWING DRAINAGES AND NAVIGABILITY POINTS



* A color version of this map is available online at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

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

Overcrowding, user conflict, and decreasing hunter satisfaction in Unit 26b for caribou hunting

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

Yes this proposal was discussed with numerous other Alaska residents, hunting guides in 26B, and was supported unanimously by the Mat Su Valley AC.

PROPOSED BY: Grant Kopplin (OI-F26-025)

Proposal 183

5 AAC 85.045 (a)(24). Hunting seasons and bag limits for moose.

Change the resident spring moose season from “to be announced” to April 1–April 14 in Unit 26B excluding the Canning River drainage as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
-----------------------------	---	------------------------------------

(24)

...

Unit 26(B), excluding the
Canning River drainage

RESIDENT HUNTERS:

1 bull by drawing permit
only; up to 30 permits
may be issued

Sept. 1 – Sept. 14

1 bull; [DURING THE PERIOD
FEB. 15–APRIL 15, UP TO A
14 DAY SEASON MAY BE
ANNOUNCED BY EMERGENCY
ORDER]

Apr. 1 – Apr. 14
[(TO BE ANNOUNCED)]

...

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

The moose population has fluctuated between 100 and 600 moose in Unit 26B since the department began implementing regular surveys in 2003. This population has been growing, with the most recent population count at 390 moose in April 2024. When the population surpassed the management objective of 200 moose, harvest was reinstated in regulatory year 2022. Harvest during the spring hunt is rare but can be important for subsistence users. Formalizing this hunt period in regulation alleviates the need to issue an emergency order each year and allows the hunt dates to be printed in the regulation book. If the population drops below 200 moose, an emergency order would be issued to close the spring hunt and, if necessary, the fall drawing permit hunt would not be held.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-027)

Proposal 184

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

Require antler destruction upon taking of moose in tier II area as follows:

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

25D (Tier II area) Moose Hunt: Antler destruction upon taking animal, trophy value must be destroyed by sawing top half of one side of antler.

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

Low Moose Population. This proposal supports subsistence hunting, which is crucial for local food security. Moose hunting holds cultural importance for many communities and maintains traditional practices is vital for the cultural heritage.

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

I discussed proposal with some local hunters. They were all in agreement this a good proposal. I also tried working with local AC, but couldn't get a quorum together.

PROPOSED BY: Walter Peter

(OI-F26-130)

Proposal 185

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

Require antler destruction upon taking of moose in 25D remainder as follows:

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

25D Remainder Moose hunt: Antler Destruction, upon taking animal. Trophy value must be destroyed by sawing top half of one side antler.

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

Low Moose Pop. This proposal supports subsistence hunting, which is crucial for local food security. Moose hunting holds cultural Importance for many communities and maintaining Traditional Practices is vital for our Cultural Heritage.

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

Discussed with local hunters in my community. All were in Agreement this is a good proposal. I tried working with local A.C. but couldn't get a quorum together.

PROPOSED BY: Walter Peter

(OI-F26-134)

Proposal 186

5 AAC 85.020 (a)(24). Hunting seasons and bag limits for brown bear.

Eliminate the drawing permit for nonresident hunters in Unit26B for brown bears as follows:

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

Eliminate the drawing permit for nonresident hunters in Unit26B for brown bears.

	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		

(24)

...

Unit 26(B), that portion
within the Dalton Highway
Corridor Management Area

[RESIDENT HUNTERS:]

1 bear every regulatory
year by bow and arrow only;

Aug. 10–June 15

Aug. 10–June 15

[NONRESIDENT HUNTERS:

1 BEAR EVERY REGULATORY
YEAR BY DRAWING PERMIT
ONLY; BY BOW AND ARROW
ONLY; UP TO 20 PERMITS
MAY BE ISSUED IN COMBINATION
WITH THE REMAINDER OF 26(B)]

[AUG. 10–JUNE 15]

Remainder of Unit 26(B)

[RESIDENT HUNTERS:]

1 bear every regulatory year

Aug. 10–June 15

Aug. 10–June 15

[NONRESIDENT HUNTERS:

1 BEAR EVERY REGULATORY
YEAR BY DRAWING PERMIT
ONLY; BY BOW AND ARROW
ONLY; UP TO 20 PERMITS
MAY BE ISSUED IN COMBINATION
WITH THAT PORTION OF UNIT 26(B)
WITHIN THE DALTON HIGHWAY
CORRIDOR MANAGEMENT AREA]

[AUG. 10–JUNE 15]

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

The management objectives for brown bears in Unit 26B includes managing for a 3-year mean annual human-caused brown bear mortality of ≤ 27 bears ≥ 2 -years old of which no more than 12 are female.

Hunting pressure for brown bears in Unit 26B remains low. The 5-year (regulatory year (RY) 24-RY20) mean annual harvest from all hunts was 16 bears per year (range =12-23), of which an average of 4 per year were female (range= 2-8). For the past 5 years (RY24-RY20), an average of 7 nonresident hunters (range = 4-10) participated in the drawing harvest (DB987) with an average harvest of 4 bears per year. By removing the requirement for nonresidents to have a drawing permit, more nonresident hunter participation will be allowed to utilize the harvestable surplus.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-033)

Fairbanks Area - Units 20A, 20B, 20C, 20F, & 25C

Proposal 187

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

Increase youth hunting opportunities by allocating a portion (5%) of the any bull draw hunts and antlerless draw hunts in 20A as follows:

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

New hunt codes would be as follows

YM770, YM771, YM774, YM641, YM655, YM768, YM769, YM772, YM773, YM628, YM639, YM668, YM679. With season dates of 1 Sep- 30 Sep.

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

Increase youth hunting opportunities by allocating a portion (5%) of the any bull draw hunts and antlerless draw hunts in 20A.

Hunter recruitment is at an all-time low. We need to provide more youth only opportunities across the state. The proposed season dates are also more advantageous to youth hunters, possibly allowing them to have a better hunt experience.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-154)

Proposal 188

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

Nonresident permit allocation for draw permit hunt DM766 limited to “up to ten percent” as follows:

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

Nonresident permit allocation for draw permit hunt DM766 limited to “up to ten percent”

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

DM766 permit hunt is becoming more sought after. With this increased interest and a recent reduction in available permits we would ask that the Board limit nonresident permit allocation to allow resident hunters a better chance of receiving permits

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

Written by Middle Nenana River AC

PROPOSED BY: Middle Nenana River AC

(OI-F26-081)

Proposal 189

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM766, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM766, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM766.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-151)

Proposal 190

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20A as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb.	
...		
1 moose by targeted permit only; by shotgun, crossbow, or bow and arrow	Season to be announced by emergency order (General hunt only)	

only; up to 100 permits may be issued

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by shotgun, crossbow, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order
(General hunt only)

...

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The primary goals of the Unit 20A antlerless hunts are to regulate moose population growth and herd

size within the intensive management (IM) population objective, at levels that the habitat can support, to provide harvest opportunity to help meet IM harvest objectives, and to provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios below objectives.

Unit 20A antlerless harvest is determined by a decision matrix that incorporates population status in relation to the IM population objective, nutritional status, and the population trend. The Unit 20A moose population is currently within the IM population objective and nutritional indices suggest the population is at moderate to high nutritional levels, but the population trend is uncertain. In November 2024, the Unit 20A population estimate was 11,696 moose (90% confidence interval 10,155–13,237 moose; 2.0–2.6 moose per square mile), which fell within the IM population objective of 10,000–15,000 moose and was similar to the previous estimated Unit 20A population size from fall 2022. Nutritional status is assessed primarily via twinning rates and short-yearling weights. The 3-year average twinning rate in western Unit 20A was 21%, 16% in central Unit 20A, and 32% in eastern Unit 20A. These twinning rates suggest moderate (10-20% twinning rates) to high (>20% twinning rates) nutritional status. Female short-yearling weights collected during 2023–2024 averaged 398 lbs, which is greater than the 385 lb threshold indicative of high nutrition in the decision matrix. The population trend since the November 2024 population survey is uncertain due primarily to the winter of 2025–2026, which appeared to negatively affect calf survival because of deep snow and persistent extreme cold. Due to this uncertainty in population trend data, no antlerless hunts in Unit 20A will be held in regulatory year 2026. Antlerless hunt plans for regulatory year 2027 will be reassessed following collection of additional data, including a planned population survey in the fall of 2026.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-014)

Proposal 191

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

Change the registration period and permit issuance in antlerless moose registration hunt RM768 to October 1-15, and change the season dates to October 15 – last day of February as follows:

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

In years that the antlerless moose registration hunt RM768 is opened, change the registration period and permit issuance to October 1-15, and change the season dates to October 15 – last day of February.

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

In years that the winter antlerless moose registration hunt RM768 is opened in Unit 20A Remainder, the registration period closes in August before the regular bull season begins. Because of this, local residents that may wish to participate in this hunt during times of food scarcity and/or when they are unable to harvest a bull moose during the regular season are unable to participate because they have missed the registration period. By shifting the

registration period and issuance of permits for RM768 to October, it would provide better opportunity for local residents to participate in the winter antlerless

moose hunt RM768.

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

Yes, this proposal was developed by the Minto Nenana Fish & Game Advisory Committee with assistance from ADFG staff.

PROPOSED BY: Minto/Nenana Fish & Game Advisory Committee (OI-F26-190)

Proposal 192

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

Maintain current antlerless hunt closures (2026) in 20A remainder as follows:

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

Maintain current antlerless hunt closures (2026) in 20A remainder. Maintain no open season for antlerless moose

by drawing permit hunt and by registration permit only as shown in 2025-2026 regulations. Reject any incoming proposals for 2027 that establish dates of Aug 15 - Nov 15 for antlerless moose by drawing permit hunt and dates of Aug 25-last day of Feb for registration permit only.

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

The Minto-Nenana AC has held a long standing position against antlerless hunts, and only supports taking of cows for ceremony. Some young moose harvested in the area have fully grown live tapeworms, which may indicate declining health. Local residents report fewer moose harvested for communities. The lower end of the confidence interval for the population estimate 10,155 is not very much above the lower end of the IM population objective of 10,000. With the hard winters and

continued climate uncertainty, precautionary management that eliminates antlerless hunts would better sustain population.

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

Yes, local ACs are concerned about low moose populations and moose health. Additionally, the winters of 2021 and 2025-2026 were extremely hard on moose, especially calves.

PROPOSED BY: Tlaa Deneldel Community Group (OI-F26-174)

**This Proposal was submitted with a map that can be found online at:*

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

Proposal 193

5 AAC 92.540. Controlled Use Areas.

Shorten the season dates for motorized restrictions in the Wood River CUA as follows:

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

We proposed to shorten the season dates for motorized restrictions in the Wood River CUA Wood River Controlled Use Area: Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the east bank of the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of the Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along the east bank of Dexter Creek to the Totatlanika River, and then down the east bank of the Totatlanika River to the Rex Trail. The area is closed to the use of any motorized vehicle, except aircraft for big game hunting including the transportation of any big game hunters, their hunting gear, and/or parts of big game, **Aug 5 - Aug 25**; *however, this does not prohibit motorized access via, or transportation of game on, the Parks Highway or the transportation into the area of game meat that has been processed for human consumption.*

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

The issue is the overly restrictive motorized vehicle closure in the Wood River Controlled Use Area (WRCUA) in GMU 20A, which severely limits affordable resident access despite abundant game populations.

History of the WRCUA: This area was established decades ago as a tool to control ground-based access and prevent potential conflicts with guides during the fall season. The current rule (5 AAC 92.540) prohibits all motorized vehicles except aircraft from August 1–September 30 (with exceptions for the Parks Highway and processed meat). While the original intent was sustainable management, the aircraft-only exception has created de facto exclusivity for commercial air transporters and guides.

Current conditions and supporting data: The moose population in all of Unit 20A is extremely healthy and at one of the highest densities in North America. Recent geospatial population estimates (GSPE) and ADF&G surveys show stable numbers (e.g., eastern 20A estimates in the 2,700–4,000+ range in recent years), bull:cow ratios of 28:100 (2022), and calf:cow ratios of

33:100. Populations remained robust even after the tough 2021–2022 winter, with normal adult mortality. Caribou are also thriving and managed conservatively via the DC827 drawing hunt, which has high success rates among participants. Predator populations (wolves and bears) remain healthy and balanced.

Despite this abundance, participation is low due to access barriers. The DC827 caribou hunt has historically low entry rates because hunters cannot reach the area affordably without aircraft. This year alone, 34 cow moose hunts went undersubscribed largely because of access fears. General-season moose success rates hover at 22–26% (hundreds of hunters), while drawing hunts reach 41%—but many more Alaskans could hunt if ground access were allowed outside peak season. Antlerless permit uptake remains low (e.g., 2021: only 112 of 260 permits hunted, 41 cows harvested).

All safety nets remain firmly in place: strict antler restrictions (50-inch, 4 brow tines, or spike-fork), drawing permits that cap additional harvest, limited cow tags, and ongoing intensive-management monitoring. These ensure any increased access will stay well within sustainable levels.

Economic reality and lack of opportunity: The aircraft-only rule forces residents to rely on expensive air transporters. Typical costs run \$3,795 base per hunter for a moose drop camp plus \$1,200–\$1,500 for meat haul (total often \$4,000–\$6,000+ per person). This is prohibitive for most resident families, especially for cow hunts or caribou. Affordable ground access via the Rex Trail, Parks Highway, or existing trails (using personal ATVs, boats, or vehicles) would open real opportunity without commercial dependency.

The restrictions effectively prioritize guide exclusivity over resident needs. This is unfair to Alaskans, violates the principle of maximum sustained yield, and contradicts the Alaska Constitution’s mandate for sustained yield benefiting residents.

What happens if nothing changes? Resident participation stays artificially low, harvestable surplus goes unused (undersubscribed permits), and the area continues to function as a private playground for well-funded air-based hunters. Other solutions (e.g., past boundary adjustments proposed in 2023–2024 Board cycles) were

considered but rejected because they do not directly address the temporal restriction that creates the affordability barrier.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-169)

Proposal 194

5 AAC 92.530. Management areas.

Allow the take of waterfowl with the use of shotgun within the Healy Lignite Management Area as follows:

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

Healy Lignite Management Area- Open to hunting by bow and arrow only, small game **and waterfowl** may also be taken by falconry and shotgun.

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

We would like the Board to allow the take of waterfowl with the use of shotgun within the Healy Lignite Management Area. The Board recently changed regulation and allowed the take of small game by shotgun but failed to address the take of waterfowl.

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

Written by the Middle Nenana River AC

PROPOSED BY: Middle Nenana River AC

(OI-F26-079)

Proposal 195

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

Increase youth hunting opportunities by allocating a portion (10%) of the antlerless draw hunts in 20B FMA as follows:

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

New hunt codes would be as follows YMXXX season dates Sept 1-Nov 27

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

Increase youth hunting opportunities by allocating a portion (10%) of the antlerless draw hunts in 20B FMA.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee

(OI-F26-156)

Proposal 196

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM786, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM786, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM786.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is an Antlerless Moose hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-158)

Proposal 197

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM788, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM788, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM788.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is an Antlerless Moose hunt.

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

No

PROPOSED BY: Craig Van Arsdale (OI-F26-160)

Proposal 198

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

Change the dates of the non-resident hunt within the Minto Flats Management area to September 8-25 in 20B and September 5-15 in 20B remainder as follows:

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

Change the dates of the non-resident hunt: in 20 B within the Minto Flats Management Area as follows:

no open season [SEPT 8 - SEPT 25]; and in 20B remainder as follows: **no open season** [SEPT 5 - 15].

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

The most recent surveys show continued low moose numbers after 2021, the rough winter that contributed to a 35% decline in Unit 20B bringing it below the IM population objective.

Additionally, some young moose harvested in the area have fully grown live tapeworms. Local residents report fewer moose harvested for communities which data shows too.

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

Yes, locals are meeting and concerned about low moose populations and moose health. Additionally, the winter of 2025-2026 was extremely hard on moose, especially calves.

PROPOSED BY: Tlaa Deneldel Community Group (OI-F26-176)

Proposal 199

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

Close a portion of western Unit 20B to nonresident moose hunters as follows:

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

Close the portion of Unit 20(B) outside the Fairbanks Nonsubsistence Area and outside the Minto Flats Management Area to nonresident moose hunters. In regulation, this area could be described as that portion of Unit 20(B) west of a line beginning at the Unit 20(A) / Unit 20(B) boundary at 64° 38.423 N. lat., 148° 38.921 W. long., north to 65° 12.586 N. lat., 148° 38.921 W. long., and that portion north of the line from 65° 12.586 N. lat., 148° 38.921 W. long., to the Unit 20(B) / Unit 25(C) boundary at 65° 12.586 N. lat., 148° 1.544 W. long.

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

The portion of Unit 20B outside the Fairbanks Nonsubsistence Area (FNSA) is split into 2 areas in 5 AAC 99.025 for moose, each with a positive customary and traditional use finding. The first area is that portion within the Minto Flats Management Area (MFMA), which has an amount reasonably necessary for subsistence uses (ANS) of 20–40 moose. The second area is that portion outside of the MFMA; this area has an ANS of 75–100 moose. The moose population within this second portion of Unit 20B decreased by approximately 48% between fall 2020 when the department estimated it at 2,386 moose (90% confidence interval 1,841–2,391) and 2023 when the department estimated it at 1,239 moose (90% confidence interval 827–1,651). This decrease was likely mostly due to the hard winter during 2021–2022. Following this decline, harvestable surplus (4% of the midpoint population estimate) was estimated at 50 bulls, which is below the ANS of 75–100 moose.

5 AAC 99.025 (c)(1) states that ANS includes the total amount of animals from a population that must be available for subsistence hunting in order to provide a reasonable opportunity for subsistence users hunting under State and Federal subsistence regulations. Furthermore, Alaska Statute 16.05.258(b)(4) states that if the harvestable portion of a population is not sufficient to provide a reasonable opportunity for subsistence uses, the appropriate board shall adopt regulations eliminating consumptive uses, other than subsistence uses. Therefore, since the estimated harvestable surplus is below the ANS in this portion of Unit 20B, and thus reasonable opportunity for subsistence uses is not being provided, eliminating nonresident moose hunting opportunity must be considered by the Board of Game since nonresident moose hunters are not subsistence users.

Moose management, as it relates to the ANS determinations, is complicated in western Unit 20B because the portion of Unit 20B outside the FNSA and outside the MFMA surrounds the MFMA

and is discontinuous in area. This regulatory structure (separate ANS determinations for each area) does not reflect the biological reality that moose from the same population move in and out of the MFMA and therefore between the areas with separate ANSs. In addition, because the area outside the MFMA does not follow drainages and includes disconnected polygons, hunting regulations created specific to this area are likely to be challenging to implement and for hunters to interpret.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-037)

Proposal 200

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20B as follows:

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

Units and Bag Limits (18)	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
...		
Unit 20(B), that portion within Creamer's refuge		
...		
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27 (General hunt only)	Sept. 1–Nov. 27

Units and Bag Limits

1 antlerless moose by muzzleloader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area

Unit 20(B), remainder of the Fairbanks Management Area

...

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

1 moose by targeted permit only; up to 100 permits may be issued

Unit 20(B), that portion within the Minto Flats Management Area

RESIDENT HUNTERS:

...

1 antlerless moose by registration permit only

...

**Resident
Open Season
Subsistence and General
Hunts**

Dec. 1–Jan. 31
(General hunt only)

**Nonresident
Open Season**

No open season.

Sept. 1–Nov. 27
(General hunt only)

Sept. 1–Nov. 27

Season to be announced
by emergency order
(General hunt only)

No open season.

Oct. 15–Feb. 28
(Subsistence hunt only)

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
Unit 20(B), the drainage of the Middle Fork of the Chena River		
RESIDENT HUNTERS:		
1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb. (General hunt only)	No open season.
...		
Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway		
RESIDENT HUNTERS:		
...		
1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Last day of Feb. (General hunt only)	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order	
Remainder of Unit 20(B)		
RESIDENT HUNTERS:		

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14 (General hunt only)	
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order (General hunt only)	No open season.
...		

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The primary goals of the Unit 20B antlerless hunts are to regulate moose population growth and size within the intensive management (IM) population objective, at levels that the habitat can support, to provide harvest opportunity to help meet IM harvest objectives, to provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios below objectives, and to reduce moose-vehicle collisions and nuisance moose issues.

The most recent unit-wide Unit 20B moose population estimate was below the IM population objective and thus there are currently few antlerless hunts offered within the unit. In November 2023, the Unit 20B moose population estimate was 7,848 moose (90% confidence interval 6,613–9,083 moose; 0.7–1.0 moose per square mile), which fell below the IM population objective of 12,000–15,000. This estimate was a decrease from the previous unit-wide survey in fall 2020, when the population estimate was 12,480 moose. The department surveyed the eastern and central portion of Unit 20B in fall 2025, and the results of this survey

suggest the moose population was stable within this portion of the unit between 2023 and 2025. The primary cause for the decline between 2020 and 2023 was likely the difficult winter of 2021–2022, which was a prolonged winter with deep snow and icing events that negatively impacted moose populations throughout the interior. Following the winter of 2021–2022, no antlerless hunts have been offered in Unit 20B except for within the Fairbanks Management Area (FMA) and within the Richardson Highway corridor. The primary purposes of the FMA and Richardson Highway corridor hunts are to reduce vehicle-moose collisions, and for the FMA, to reduce nuisance moose issues.

The only antlerless hunts planned for Unit 20B for regulatory year 2026 are within the FMA and Richardson Highway corridor. Furthermore, the targeted hunt for any moose may be used to address public safety or nuisance moose issues. The department will base antlerless hunt plans for regulatory year 2027 and beyond on the results of the planned western Unit 20B moose population survey in fall 2026 as well as ongoing monitoring of nutritional indices. No additional antlerless hunts beyond the FMA, Richardson Highway corridor, and targeted hunts will be held in the near future unless the unit-wide population increases to within the IM population objective, nutritional condition declines, or there is an identified harvest surplus within a portion of the unit due to an increased population.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-015)

Proposal 201

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

Create a new muzzleloader hunt in a portion of unit 20C as follows:

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

We would like to see the hunt structure modeled after the existing DM766 hunt. Season dates from Nov1-Dec15. Bag limit 1 bull for resident hunters and 1 bull with antlers 50" or greater or 4 or more brow tines on one side for non-resident hunters. We would ask up to 50 permits be made available. We would also like the Board to consider restricting non-resident hunters' permit allocation of no more than ten percent of permits issued, using the language of "up to 10% non-resident allocation".

The proposed hunt area would be as follows. That portion of unit 20C bounded on the East by the East bank of the Kantishna river to its confluence with the Toklat river, following the east bank of the Toklat river which is North of DNP&P. Bounded on the North by the North bank of the Tanana river. Bounded on the West by the 20C boundary to the point of the boundary directly west of the North West corner of Denali Preserve then following a straight line to the Preserve boundary. Bounded on the South by the northern boundary of DNP&P.

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

We would like the Board to consider creating a new muzzleloader hunt in a portion of unit 20C. A growing number of hunters are participating in the current DM766 muzzleloader permit hunt. Creating this would open up additional opportunity for a late season hunt in an area that receives very little hunting pressure during general season due to limited access.

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

Written by the Middle Nenana River AC

PROPOSED BY: Middle Nenana River AC (OI-F26-080)

Proposal 202

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

Improve youth hunting opportunities by changing the youth hunt in 20C RM781, 25 Aug- 31 Aug, to a draw hunt with new dates as follows:

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

New draw hunt YMXXX (up to 10 permits, resident only) season dates 26 Sep- 30 Sep. Harvest has been on average one bull during the previous 5 youth seasons. Speaking to the area biologist there is enough surplus to allow a later season hunt that would allow more success for youth hunters. The dates a draw selection were chosen to avoid conflict with local hunters.

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

Improve youth hunting opportunities by changing the youth hunt in 20C RM781, 25 Aug- 31 Aug, to a draw hunt with new dates.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-157)

Proposal 203

5 AAC 92.220. Salvage of game meat, furs, and hides.

Require Bone-In Transport of Moose Meat in the Lake Minchumina Area of Unit 20C as follows:

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

PROPOSED REGULATION

The Lake Minchumina area of GMU 20C, as defined by all Lake Minchumina watersheds draining into the Muddy River and Birch Creek as far as the Kantishna, the meat of a harvested moose must remain naturally attached to the bone on the front and rear quarters as well as the ribs until removed from the field or transported to the location where it will be processed.

WHAT WILL HAPPEN IF NOTHING IS DONE

Field deboning may continue to contribute to wanton waste and complicate enforcement.

BENEFITS

Ensures full salvage of edible meat. Aligns with regulations used in other Alaska units. Simplifies enforcement of wanton waste laws.

COSTS

Slightly heavier pack loads for hunters

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

Require Bone-In Transport of Moose Meat in the Lake Minchumina Area of Unit 20C PROBLEM

Deboning moose meat in the field increases the risk of wanton waste and makes enforcement difficult. With the rising number of hunters entering Unit 20C—the risk of improper salvage increases.

In remote areas such as the Lake Minchumina region, difficult terrain and transportation logistics can lead to meat being left behind when animals are deboned in the field.

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

Yes, this proposal was developed by the Lake Minchumina Fish & Game Advisory Committee

PROPOSED BY: Lake Minchumina Fish & Game Advisory Committee (OI-F26-181)

Proposal 204

5 AAC 85.045; 92.050. Hunting seasons and bag limits for moose; Required permit hunt conditions and procedures.

Create a limited draw Moose hunt for nonresidents in the Lake Minchumina area of GMU 20C as follows:

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

The Lake Minchumina area of GMU 20C, as defined by all Lake Minchumina watersheds draining into the Muddy River and Birch Creek as far as the Kantishna, shall have a limited permit drawing for Moose hunting once per year for non-Alaskan residents. The initial drawing will take place in the Lake Minchumina Community Building during the first week of June and consist initially of three permits awarded. Permits shall be awarded only to those participants physically present during the drawing.

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

Increased hunting pressure in the Lake Minchumina Area of GMU 20C has led to a lack of sufficient local moose numbers.

Although GMU 20C encompasses a vast area of the Alaskan Interior, Lake Minchumina lies along the extreme western rim of GMU20C. As such we have a limited watershed upon which to effectively hunt. Our principally accessible hunting area is the Lake Minchumina out flow Muddy River sometimes down to its confluence with Birch Creek and the Mckinley Fork of the Kantishna. Our accessible hunting portion of GMU 20C has rarely received any moose number attention other than hunter tag data. Yet, we are a community wholly dependent upon this valuable resource. To put matters in perspective: of the 13 moose harvested locally last fall only three remained for community consumption, the rest of them left with the hunters.

What would happen if nothing is changed?

A high volume hunting /transporting /guide operation simply does not bode well for our vulnerable, moose dependent, community of Lake Minchumina. We seek to mitigate, at least to a degree the impact of high volume operations upon this community.

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

Yes, this proposal was developed by the Lake Minchumina Fish & Game Advisory Committee

PROPOSED BY: Lake Minchumina Fish & Game Advisory Committee (OI-F26-182)

Proposal 205

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

Change the dates of the non-resident moose hunt in 20C to September 1 - 25 as follows:

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

Change the dates of the non-resident hunt in 20C as follows: **Sept 5** [SEPT 1] to **Sept 15** [SEPT 25].

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

20 C is a low density moose area and a full survey has not been completed since 2011. With the new road, agriculture developments, and private land sales, fewer local residents are reporting successful hunts. Additionally, some young moose harvested in the area have fully grown live tapeworms.

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

Yes, locals are meeting and concerned about low moose populations and moose health. Additionally, the winter of 2025-2026 was extremely hard on moose, especially calves.

PROPOSED BY: Tlaa Deneldel Community Group (OI-F26-179)

Proposal 206

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

Change bag limit and special instructions for RM 781 to one bull with spike fork antlers, 50 inch antlers, or 4 or more brow tines on at least one side as follows:

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

Change the bag limit and special instructions for permit hunt RM781 to read: One bull with spike-fork antlers or 50-inch antlers or 4 or more brow tines on at least one side by permit available online at hunt.alaska.gov or in person in Fairbanks, Delta Junction, Tok, Minto, Tanana, Nenana or Central beginning July 1

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

In Unit 20C the bag limit and special instructions for hunt permit RM781 for resident hunters is stated as One bull by permit available online at hunt.alaska.gov or in person in Fairbanks, Delta Junction, Tok, Minto, Tanana, Nenana, and Central beginning Jul1. This is putting strain on Moose Population in Unit 20C.

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

Developed in coordination with local hunters in the Healy Unit 20C area after observing a noticeable drop in bull moose population in Unit 20C over the last several years.

PROPOSED BY: Howard Walters

(OI-F26-042)

Proposal 207

5 AAC 92.540. Controlled Use Areas.

The Lake Minchumina area of GMU 20C shall have hunting access limited to surface use watercraft transport as follows:

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

The Lake Minchumina area of GMU 20C, as defined by all Lake Minchumina watersheds draining into the Muddy River and Birch Creek as far as the Kantishna, shall have hunting access limited to surface use watercraft transport. Float plane access is limited during the moose hunting season to and from only Lake Minchumina and Wien Lake. All other lakes of the Lake Minchumina/Muddy River/Birch Creek watershed shall be limited to surface access means during the scheduled moose season in GMU 20C.

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

Increased hunting pressure in the Lake Minchumina Area of GMU 20C has led to a lack of sufficient moose numbers harvestable by local community residents, a trend increasing with a recent development.

Lake Minchumina is easily accessed by Wright Air Service with two to three times per week mail, passenger and freight service. Although GMU 20C is a vast area of the Alaskan Interior, Lake Minchumina lies on the western rim of GMU20C. We have a limited watershed area upon which to hunt. Of 13 moose harvested locally last fall only three remained for community use.

Alaska Mental Health Trust's (AMHT) award of a multi-year permit for Willow Air Guide & Transporter exclusive access and use of AMHT's lands on the surrounding area of Lake Minchumina is impactive. Willow Air's reputation is a "high volume" hunter transporter guide and warrants concern of commercial moose hunting pressure in the Lake Minchumina area. We have seen increased float plane camps on lakes in the Minchumina area.

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

The Lake Minchumina Fish and Game Advisory Committee, on the recent meeting of April 25, 2026 was not able to discuss and debate the merits of this proposal. Nonetheless, some

Minchumina Community members thought it did merit consideration by the Alaska Board of Game and as such is now submitted to the Board of Game by the May 1, 2026 deadline.

PROPOSED BY: Walter Maakestad

(OI-F26-078)

**A map was included with this proposal submission and can be found online at*

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

Proposal 208

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

Remove the winter moose hunting season from regulations in GMU 20F as follows:

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

Remove the winter moose hunting season from regulations in GMU 20F as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose

Unit 20(F), that portion drained by the Yukon River downstream from, but not including, the Hess Creek and Tanana River drainages

1 bull by registration permit only Sept. 5 - Sept. 25

[DEC. 1 - DEC. 15]

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

Moose numbers in Unit 20F have declined to a point where having a winter hunt can no longer be justified. The winter season is for bulls only, but there have been observations of illegal cow harvest during the winter season. The area is accessible by winter road and snowmachine from the Elliot Highway and gets too much pressure. Cows are hauled out in the dark during winter. This area used to have a nice little herd of cows that hung out in the wintertime, but they are gone.

Moose population surveys have never been conducted in this area. Residents of Rampart have reported seeing less moose in recent years and it is taking more time and effort to harvest moose. The Eastern Interior Regional Advisory Council (EIRAC) has requested surveys of the 20F moose population for years through letters and their Annual Reports, but neither State nor Federal managers have been able to prioritize them to date.

Based on these reasons, management needs to be more conservative and reduce harvest opportunity by closing the winter season.

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

This proposal was discussed and developed in a public meeting. The EIRAC Chair serves on the Tanana-Rampart-Manley Advisory Committee as the Vice Chair.

PROPOSED BY: Eastern Interior Subsistence Regional Advisory Council (EIRAC) (OI-F26-116)

Proposal 209

5 AAC 99.025. Customary and traditional uses of game populations.

Re-evaluate the ANS for 20F and 20C and create a separate ANS for each subunit to be able to more accurately evaluate whether ANS is being met in 20F as follows:

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

Re-evaluate the ANS for these units and create a separate ANS for each subunit to be able to more accurately evaluate whether ANS is being met in 20F.

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

Residents of Tanana and Rampart report not meeting their subsistence needs for moose in recent years. They have observed a decline in numbers of moose and are increasingly putting in more effort to try to harvest them.

Currently the ANS for moose is combined for Units 20F and 20C and is 100-130 moose. These two areas are vast and the subsistence use patterns and access are highly varied between these two units.

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

Yes, this proposal was developed by the Tanana-Rampart-Manley Advisory Committee.

PROPOSED BY: Tanana/Rampart/Manley Fish & Game Advisory Committee (OI-F26-191)

Proposal 210

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

Change the winter moose hunting season in GMU 20F to a Tier II hunt as follows:

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

Change the winter moose hunting season in GMU 20F to a Tier II hunt For Change the Dec 1 - Dec 15 hunt to a tier II hunt.

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

By default, all 20F moose hunts are essentially Tier I hunts already, as there are no non-resident opportunities.

Tanana and Rampart community members have had a difficult time harvesting moose in the fall season and have seen the population decline drastically for some time now. While the 2025 unit-wide harvest of only 12 bulls (local and non-local success combined) may appear to be an anomaly, it is a realistic reflection of the dwindling success local hunters from these communities have faced in recent years.

Given the ongoing decline in salmon populations, the residents of Tanana and Rampart can no longer afford to wait for official Department trend data to catch up with their direct, on-the-ground observations of depressed moose numbers.

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

Yes, this proposal was developed in conversation with the Tanana-Rampart-Manley Advisory Committee and Department staff.

PROPOSED BY: Janessa Newman (OI-F26-205)

Proposal 211

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

Change hunting season for moose in 25C to start one week later than it currently does, for the same number of days that are allowed now as follows:

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

My husband and I would like to suggest the hunting season for moose in 25C be changed to start one week later than it currently does, for the same number of days that are allowed now. It seems over the last 25 plus years we've been hunting the area, the seasons have changed and the moose are not active until later in September. This change wouldn't necessarily need to be applied to non-residence hunters, but it would be nice for us resident hunters. Thank you for your considerations

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

Our issue is the lack of moose, which we and many others believe to be tied into the milder climate. The leaves are dropping later and later in the fall and the moose just are not as active as they used to be during the current hunting dates for Unit 25C.

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

This is a suggestion based on our personal experience and the many, many comments of other hunters who believe the climate is affecting the hunting season for moose.

PROPOSED BY: Renee Dick

(OI-F26-070)

Proposal 212

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

Change the bag limit in RM 781 and RM 749 registration moose hunts to: One bull with 50" antlers or antlers with 3 or more brow tines on at least one side as follows:

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

Change the bag limit on all the above nonresident registration moose hunts to:

One bull with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** within Creamer's Field Migratory Waterfowl Refuge Sept 1 – Sept 30 and Nov 21 – Nov 27

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** Remainder of Fairbanks Management Area Sept 1 – Sept 30 and Nov 21 – Nov 27

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** drainage of the middle (East) fork of the Chena River Sept 26 – Sept 30

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** Salcha River drainage upstream from and including Goose Creek Sept 26 – Sept 30

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20D RM 749 **Nonresident** within the Healy River drainage Sept 1 – Sept 20

One bull with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20D RM 749 **Nonresident** north of the north bank of the Tanana River including the Volkmar River drainage, east to include the Billy Creek drainage, including the Healy River drainage Sept 1 – Sept 20

One bull with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20D Remainder RM 749 **Nonresident** Sept 1 – Sept 15

One bull with 50” antlers or antlers with 3 or more brow tines on at least one side

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

Nonresident Registration Any-Bull or Antlered-Bull Moose Hunts

The opportunity to take a bull moose without antler restrictions should be reserved for residents only as it is a meat hunt that provides special opportunity for resident moose hunters to fill their freezer.

Resident hunters continually ask for more any-bull moose hunts as it is so much more likely to be able to harvest a moose without antler restrictions. But they are told by the Department that only so many any-bull hunts can be offered. With such limited any-bull over-the-counter moose hunts available, it makes no sense to allow nonresidents to have that same bag limit. An archery only hunt or weapons restriction hunt is not a reason to allow an any-bull bag limit.

We don’t want to eliminate nonresident over-the-counter moose hunting opportunity in Unit 20, however we do want there to be antler restrictions for all nonresident moose hunts.

There are several nonresident registration moose hunts in Unit 20 that have a bag limit of any-bull or antlered bull, listed below.

Unit 20 Nonresident Registration Moose Hunts with Any-Bull or Antlered Bull Bag Limit

Unit 20B RM 781 within Creamer’s Field Migratory Waterfowl Refuge

Sept 1 – Sept 30 and Nov 21 – Nov 27 **One bull with spike fork antlers or greater by bow & arrow only**

Unit 20B Remainder of Fairbanks Management Area

Sept 1 – Sept 30 and Nov 21 – Nov 27 **One bull with spike fork antlers or greater by bow & arrow only**

Unit 20B RM 781 drainage of the middle (East) fork of the Chena River Sept 26 – Sept 30 **One bull by bow & arrow only**

Unit 20B RM 781 Salcha River drainage upstream from and including Goose Creek Sept 26 – Sept 30 **One bull by bow & arrow only**

Unit 20D RM 749 within the Healy River drainage Sept 1 – Sept 20 **One bull**

Unit 20D RM 749 north of the north bank of the Tanana River including the Volkmar River drainage, east to include the Billy Creek drainage, including the Healy River drainage Sept 1 – Sept 20

One bull

Unit 20D Remainder RM 749 Sept 1 – Sept 15 **One bull**

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-095)

Proposal 213

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Open a resident-only spring brown bear season extension in Unit 20A and 20B Remainder as follows:

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

We propose a resident-only spring brown bear season extension in Unit 20A and 20B Remainder Residents: One bear every regulatory year Sept 1-June 30

The nonresident season and bag limit would remain the same and close on June 15.

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

EXTEND BROWN BEAR SEASON TO JUNE 30 FOR RESIDENTS ONLY

The current grizzly bear hunting season in Units 20A and 20B (remainder) closes on June 15, while legal black bear baiting stations remain active and permitted through June 30. This 15-day gap unnecessarily limits resident hunting opportunity during the late-spring period when bears are active at baits.

Grizzly bear populations in these units are healthy and stable. ADF&G has recently liberalized seasons in this area (most recently extending the close from May 31 to June 15) with no conservation concerns. Harvest levels remain low and well within sustainable limits: for example, recent data show only ~31 brown bears harvested annually across the large, combined area of Units 20A, 20B, 20C, 20F, and 25C (55% males), and historical harvests in 20A/20B alone have averaged 10–18 bears per year. Interior Alaska brown bear densities are low to moderate (10–25 bears per 1,000 mi² in similar habitat), and sustainable harvest rates are 5–6% of the population—current take is far below that threshold.

If nothing changes, resident hunters lose the final two weeks of baiting opportunity each year, reducing both recreational and subsistence harvest potential with zero biological benefit. Other solutions considered (e.g., no change or a full year-round season) were rejected because this targeted 15-day extension perfectly aligns hunting with existing baiting rules while maintaining the conservative one-bear bag limit and fall/spring structure.

We did not want to include nonresidents in this season extension due to potential conflicts with guided nonresidents and increased baiting activity by guides who are allowed up to 10 bait stations in each guide use area.

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

Yes, the Fairbanks AC developed this proposal.

20A Sheep (GS000) Resident Stats RY21-25						
	2021	2022	2023	2024	2025*	Avg
Hunted	135	96	111	136	124	120
Harvested	18	12	20	21	19	18
% Success	13%	13%	18%	15%	15%	15%

*Preliminary data

20A Sheep (GS000) Nonresident Stats RY21-25						
	2021	2022	2023	2024	2025*	Avg
Hunted	47	47	40	49	51	47
Harvested	26	24	20	24	35	26
% Success	55%	51%	50%	49%	69%	55%

*Preliminary data

PROPOSED BY: Fairbanks Fish & Game Advisory Committee

(OI-F26-163)

Proposal 214

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit nonresident sheep hunting opportunity in Unit 20A as follows:

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

Limit nonresident sheep hunting opportunity in Unit 20A.

Unit 20A Sheep

Nonresident Aug 10 – Sept 20

One ram with full-curl horn or larger every four regulatory years by draw permit DSXXX Up-to 20 permits may be issued

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

Sheep Declines in Unit 20A, Unlimited Nonresident Opportunity, Crowding & Conflicts

Continued unlimited nonresident sheep hunting opportunity in Unit 20A during a significant sheep decline is unwarranted, even if it poses no sheep conservation concerns under full-curl management.

Unlimited nonresident sheep hunting opportunity in Unit 20A combined with no limits on the guides nonresident sheep hunters are required to hire isn't good for anyone and with fewer legal rams on the landscape it exacerbates the conflicts.

Nonresident sheep hunters in Unit 20A harvested 57 percent of the sheep on average over the last five years: (ADFG charts)

20A Sheep (GS000) Harvest by Residency RY21-25						
	2021	2022	2023	2024	2025*	Avg
Resident	18	12	20	21	19	18
Nonres	26	24	20	24	35	26
% Nonres	59%	67%	50%	53%	58%	57%

*2*Preliminary data. Note for RY25, the resident and nonresident harvest does not add up to the total harvest for the area. This is due to several harvest tickets with no residency information included.*

Nonresident guided sheep hunters make up 28% of all the sheep hunters on average over the last five years and have nearly four times the success rates as resident hunters:

The sheep population in Unit 20A has significantly declined, however there was a bright spot in the 2025 minimum count survey with a marked increase in the number of lambs, along with an overall increase in the population. Still, we are looking at a decades long period for sheep recovery if it does happen and sheep will remain at low numbers for the near future.

The board is on record stating that there are problems with unlimited nonresident sheep hunting opportunity combined with no limits on guides when sheep populations are this low. This is why the option the board chose to solve similar problems in Unit 19C was to implement a guide concession program to limit the number of guides and their clients. There may very well be proposals to implement such a program in Unit 20A before the board during this cycle.

But until there is a guide concession program in Unit 20A, with the current status of our sheep population we believe nonresident sheep hunters should be limited. And the only way we see to do that is via draw permits with a limited allocation. We recognize why a draw permit system is not preferred by the guides, but we do it in plenty of other units. Any new draw permit system would not take effect until the fall 2028 season.

With all due respect to the board, it's past time to act and limit nonresident sheep hunters in Unit 20A. We don't need it to be a draw for both residents and nonresidents; there is no reason we

can't just have a draw hunt for nonresidents while allowing over-the-counter resident sheep hunting opportunity at the same time.

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

Thanks to Department staff for the data and charts!

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-094)

Proposal 215

5 AAC 84.270. Furbearer trapping.

State owned lands in the Stampede Road corridor should be closed to hunting and trapping of wolves, coyotes, wolverine, and lynx as follows:

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

State owned lands in the Stampede Road corridor should be closed to hunting and trapping of wolves, coyotes, wolverine, and lynx. These lands are referred to hereinafter as the "Stampede Road Townships." These lands are specifically described as follows:

(a) Unit 20(C), that portion west of a line beginning at 63° 48.146' N. lat., 148° 59.934' W. long., north to 63°49.445' N. lat., 148° 59.935' W. long., then west to 63° 49.445' N. lat., 149° 12.699' W. long., then north to 63° 54.642' N. lat., 149° 12.699' W. long., and bounded on the south, west, and north by Denali National Park.

A map depicting these lands is provided. The legal description and the map are taken from an emergency closure order issued by Commissioner Sam Cotton on April 2, 2018.

A regulation to implement this proposal should provide as follows:

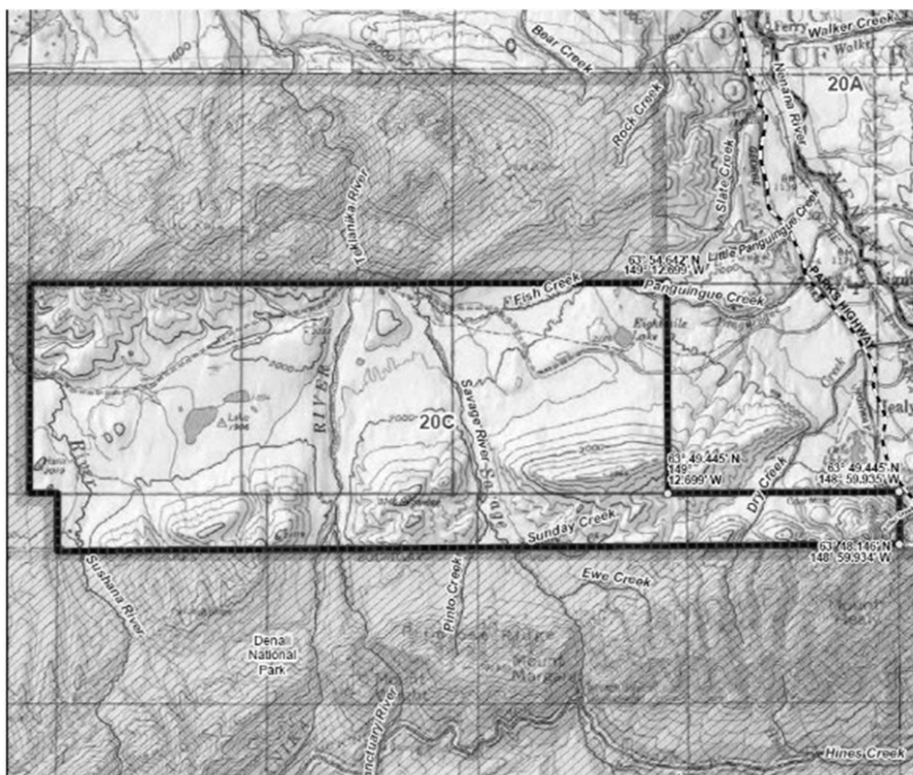
5 AAC 84.180 Areas Closed to Hunting and Trapping. Hunting and trapping of wolves, coyotes, and wolverine, and lynx is closed in the area known as the Stampede Road Townships, which are described in subpart (a) of this regulation, as follows:

(a) Unit 20(C), that portion west of a line beginning at 63° 48.146' N. lat., 148° 59.934' W. long., north to 63°49.445' N. lat., 148° 59.935' W. long., then west to 63° 49.445' N. lat., 149° 12.699' W. long., then north to 63° 54.642' N. lat., 149° 12.699' W. long., and bounded on the south, west, and north by Denali National Park.

(b) Exceptions:

(1) Use of a firearm to kill one of the listed species in self defense, or in defense of private property, for instance companion animals, poultry or livestock, is not prohibited by this section.

A map depicting the lands proposed to be closed is provided. Areas proposed to be closed are within the area outlined in red. Lands administered by the National Park Service are shown in blue.



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

As recently as 2010 part of the lands located in the Stampede Road Townships were closed to the hunting and trapping of wolves by regulation at 5 AAC 84.180. But the Board of Game subsequently repealed those closures, and at the current time there are no regulations providing for year round closures of these lands to the hunting and trapping of wolves, coyotes, wolverine, and lynx. Hunting and trapping of wolves, coyotes, wolverine, and lynx in the Stampede Road Townships negatively impacts the viewing of these species by Alaskans on wildlife viewing tours inside the Denali National Park. Wildlife viewing is a use of wildlife protected by Article VIII, Section 3 of the Alaska Constitution, This section is commonly referred to as “the Common Use Clause”. The fact that wildlife viewing is protected by the Common Use Clause was expressly found to be the law in Michelle Stone Bittner v. State of Alaska, et al, Case No. 3AN-23-07487 CI, where the Superior Court in a decision dated March 12, 2026, held at page 12 as follows:

"Article VIII provides that '[w]herever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.' The clause does not limit use to consumption or to consumptive users. As the United States Supreme Court has recognized, aesthetic and environmental well being - like economic well being - are essential components of the quality of life. Non-consumptive use advances those interests just as consumptive use advances economic ones. The term 'common use' is broad enough to encompass both. In sum, wildlife is reserved 'to the people,' not merely to those who consume it."

The Superior Court continued in its decision to explain that a Court reviewing a challenge to a regulation should not second guess the Board's decision, but should "ensure that the Board has taken a hard look at all factors relevant to the public interest before making that decision"; and that in regard to wildlife viewing, the Board did not take a hard look at the public's interest in viewing wolves when in 2022 it modified 5 AAA 92.111(c), and for that reason and others, declared the regulation arbitrary and invalid: stating at page 18 of the decision as follows:

"As discussed above, non-consumptive use is a form of common use reserved to the people of Alaska under Article VIII. Because it is constitutionally protected, it is a factor relevant and material to the public interest. The hearing transcripts show that the Board did not consider the impact expanded predator control would have on non-consumptive users of wolves. By failing to consider the impacts of wolf control on non-consumptive users, the Board failed to take a hard look."

For that reason and others, the Court on April 12, 2026 declared the regulation invalid, and entered final judgment in favor of Ms. Bittner and authorized her to file a motion for attorneys fees.

The decision by the Superior Court in the Bittner case, and the authorities upon which the Court relied, establishes that the loss of viewing by Alaskans is an important, constitutionally protected use. With that clear statement of this constitutional law, we know now that the repeal after 2010 of closures of wolf hunting and trapping in the Stampede road townships was arbitrary and voidable.

This instant proposal if adopted by the Board would provide a remedy for the previous arbitrary and voidable decisions of the Board of Game, where the Board opened all state owned land in the Stampede Road Townships to hunting and trapping of wolves..

The number of people who ride the buses on wildlife tours along the Park Road substantially exceed 100,000 every year, while only a handful of hunters and trappers consume these watchable wildlife species in the Stampede Road Townships. Closing state lands in these limited areas to hunting and trapping of the listed species is highly likely to increase the aesthetic enjoyment of non-consuming Alaskan visitors to the Park.

The Board needs to take a hard look at the numbers of consumptive users vs. non-consumptive users, the frequency of sightings before and after the repeal of the previous closures, the economic impact of allowing hunting and trapping in this limited area, and abide by the constitutional mandate that wildlife is reserved for both non-consumptive and consumptive users.

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

Yes. I consulted with individuals familiar with the history of efforts to close the townships and the Superior Court's decision.

PROPOSED BY: Kneeland Taylor (OI-F26-076)

Proposal 216

5 AAC 84.270; 92.095. Furbearer trapping; Unlawful methods of taking furbearers; exceptions.

Change the boundaries of the closed area to allow beaver trapping with submerged sets above the River Road bridge on the Chena River as follows:

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

Unit 20B – that portion of the Chena River downstream from the River Road bridge and Creamers Field Migratory Waterfowl Refuge

No Open Season

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

Beaver trapping in the closed area of Unit 20B

Change the boundaries of the closed area to allow beaver trapping with submerged sets above the River Road bridge on the Chena River

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-165)

Proposal 217

5 AAC 84.270. Furbearer trapping.

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20B Remainder as follows:

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

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20B Remainder

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

In 2022 the regulations were changed to allow the use of a firearm and bow and arrow to take beavers under a trapping license statewide. This method of beaver harvest was allowed from 2022 until 2026, when the board was made aware of a conflicting regulation. The board clarified the conflicting regulation by returning the regulations to pre-2022 language. There are no current conservation concerns for beaver. I would like the board to restore the use of a firearm and bow and arrow as a legal method and means to take beaver under a trapping license in Unit 20B Remainder. This would not affect that portion of the Chena River downstream from its confluence with the Little Chena River and Creamer's Field Migratory Waterfowl Refuge.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-155)

Proposal 218

5 AAC 84.270. Furbearer trapping.

Change season and bag limits for Furbearer Trapping in 20A and B as follows:

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

Proposal to reduce harvest of beaver and improve management of beaver populations:

Change to Alaska Administrative Code:

Article 7 -Seasons and Bag Limits, 5 AAC 84.270 Furbearer Trapping: Unit 20 (A) change from "no closed season, no limit" to "November 1 - April 30, no limit." Remainder of Unit 20 (B) change from "September 25 - May 31 no limit" to "November 1-April 30, no limit."

Suggestions for improved management of beaver populations:

1. The harvest period needs to be shortened to eliminate the open water seasons which extend from when the rivers start moving until May 31 and from September 25 through October 31. Beavers mate during the months of February and March. The gestation period is 105-107 days and kits are born after breakup. (Ref. #1). Harvesting during the spring open water season reduces the number of dominant females and corresponding new born kits. It is the most vulnerable time for beaver groups and colonies, since beavers only produce one litter per year. Harvesting beaver should not be allowed during this period of time. The fall open water season should be eliminated, as long as necessary to allow the beaver populations to increase back to normal levels
2. Each major drainage in 20B should be treated differently for management purposes, since each have different habitats and access points for the public. River drainages with large amounts

of aspen, birch and willow are better habit for beavers than areas dominated by climax forests, and harvest pressure is a function of accessibility.

3. Regulations should promote the taking of beaver while their hides are prime, ie when both the under fur and guard hairs are at their maximum length and density. Nonprime furs have under-developed underfur and guard hairs and the leather is reddish to black, due to root hair production of melanin. Grade IV and V pelts are almost useless (Ref. 2). Beaver molt their furs annually and trappers report the shedding of fur within 10 days of break-up. Fur management regulations normally are designed to permit trapping when the fur is prime, across species.

4. Beaver surveys should be conducted regularly in late fall to count the active beaver houses for each of the major drainages in 20B: the Saleha, Chena and Chatanika rivers. Beaver populations could then be estimated and harvest quotas determined, for use in establishing open seasons and methods of harvest.

5. Use of fire arms to harvest beaver should not be permitted as a means for harvest, except to kill nuisance beaver. To the extent open water seasons exist, trapping should be allowed only with underwater traps and snares, as written in the current regulations in 20 B (Ref 3)

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

An over harvest of beaver has occurred in unit 20 B due to the open water (non -ice) harvesting by various users, including non-fur takers who use the carcasses for bait. The current non-ice season for 20B is from April 15 through May 31, and September 25 through October 31. Trapping beaver on non-ice waters allows use of more efficient methods for accessing and harvesting beaver than fur-takers using under ice methods. This has resulted in reduction in beaver populations with fewer live houses (those with fall-time caches) and live houses with smaller caches.

User groups have been recently promoting non-prime fur harvesting of beaver. Trappers have been using above water conibears and leg hold sets and firearms. 5AAC 92-095(a)(10) prohibits use of firearms in 20B and requires below water-line traps and snares during the open water (non-ice) season.

Also, use of beaver carcasses for bear baiting and dog food has increased the non-fur demand, adding to the open water season harvest. Since 2022 firearms have been used, as the Board is aware, due to an error printed in the trapping regulations booklets distributed to the public. According to several experienced hunters that have used firearms to dispatch beaver, retrieval success is often 50 percent, resulting in waste of game.

I have been trapping beaver on the Chatanika River for the last 25 years and have kept records for a ten mile stretch of the river. In 2001-2002, there were 12 beaver houses with live caches in the lower stretch of the line. The upper portion of the line had 6. Over 270 beavers were harvested from that stretch of river since 2001. Our harvest for the 2026 season was 1 beaver, and there were six trappable houses.

Most of this decrease has occurred since 2022, which coincides with firearms beginning to be used, and an increase in user group promotion of open water harvesting. I became aware of

firearm use on beaver in early September of 2024. We encountered a hunter setting up an ambush on a beaver house and the hunter asked us if we were aware that it was legal to shoot beaver for bear bait. The date was September 3, three weeks before the open water season. This was also the first year we noticed a significant decrease in the number of live houses. We went to see Fish and Game to report our observations and they said they encountered a boater in possession of 12 beaver the last of May near the Olmes campground. These beaver were taken for the carcasses.

My records of fall beaver caches and beaver harvest for the Chatanika River may be the only records for this area, since there is no beaver biologist employed at ADFG - Fairbanks.

Individuals that have trapped 20A for the last 25 years have indicated that the last time they were able to get to their line, no caches were visible on any of the beaver lodges in the area.

I have a cabin on the Saleha river, and in 2010 there were 10 beaver houses visible within a 2 mile distance from our cabin. Today there are 2. Whereas in the past, beavers were seen swimming all up and down the river. There were "lumber yards near caches", and "bones" littered the gravel bars. Today all of the above are noticeably missing.

Ref #1: "Wild Furbearer Management and Conservation in North America", (WFMC), Ch. 25., pg 285.

Ref #2: WFMC, Ch. 53., pg. 720 & 726.

Ref #3: Alaska Administrative Code 5AAC 92.095 "The following methods and means of taking furbearers under a trapping license are prohibited: (10): taking beaver in Units 11, 13 and 16 from September 25 through November 9; in the remainder of 20 (B) and in Unit 20(0) from September 25 through October 31 and from April 16 through May 31; and in Units 7 and 15 from October 15 through November 9 and from April 1 through April 30, except with underwater traps or snares."

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

PROPOSED BY: Garry Hutchison

(OI-F26-136)

Proposal 219

5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

Reestablish the Beaver Sealing Requirement in GMU's 20 A, B, C, D as follows:

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

In the interest of beaver conservation, I believe it would be prudent to reestablish the Beaver Sealing Requirement in GMU's 20 A, B, C, D in order to provide harvest data to the ADF&G necessary to answer questions regarding appropriate levels of harvest, numbers taken within

specific drainages, methods of harvest, age class ratios, and the chronology of harvest in the central Interior.

Regulatory Language May Read As Follows:

5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

(a) A person may not possess, transport, or export from the state the untanned skin of a marten taken in Units 1 - 7 and 14 - 16, the untanned skin of a beaver taken in Units 1 - 11 and 13 - 17, **20A, B, C, D, ...**

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

Potential beaver harvest concerns exist in Interior Alaska; the cessation of beaver harvest data collection in the Interior by ADF&G in the early 2000's (due to beaver sealing requirements being repealed) and the elimination of Fur Acquisition Form and Fur Shipping Tag requirements has resulted in the loss of beaver harvest data from the past 20 or so years. As a result, effective beaver harvest monitoring no longer exists.

There is currently controversy surrounding potential beaver declines in highly accessible, high pressure portions of central GMU 20, centering on the expanded beaver seasons and the allowance of harvest by shooting through the Spring.

In the last decade there has also been a significant increase in demand for beaver carcasses for usage as bear bait, with harvest being facilitated by open water trapping/shooting seasons.

In my extensive personal experience, harvesting beaver by shooting in open water contributes significantly to unrecorded take and wounding loss rates, if done without precise shot placement and the utilization of retrieving dogs or equivalent methodology for rapid retrieval before carcasses sink or are swept away.

Lastly, with open water take, it is virtually impossible to determine if beaver have been harvested from colonies that are being trapped annually by established trappers, who often utilize the accepted practice of limited harvest per lodge to farm beaver colonies.

Beaver as a species are long-lived furbearers, documented to live up to 12 years in the wild. That combined with relatively low reproductive rates leave beaver populations vulnerable to over harvest.

I believe the resumption of harvest data collection is necessary for ADF&G to manage beaver more effectively and that sealing is an efficient method of data collection.

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

No, This was primarily the culmination of numerous discussions with a variety of beaver trappers in the central GMU 20 area.

PROPOSED BY: Robert Hunter (OI-F26-214)

Antlerless Moose & Brown Bear Tag Fee

Reauthorizations for Other Regions

Proposal 220

5 AAC 085.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6(C) as follows:

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

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued	Sept. 1-Oct. 31 (General hunt only)	No open season.
or		
1 moose by registration permit only;	Nov. 1-Dec. 31	No open season.
...		

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

Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The department recommends reauthorizing the state antlerless hunt in Unit 6C to achieve the harvest objectives when the federal subsistence hunt is not able to achieve the desired level of harvest.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. Preliminary survey data from 2026 suggests that the population is back within the population objective. Because

the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, we have not held the antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as intended when it is needed. Continuation of the antlerless hunts may be necessary to manage population growth and keep it within the limits of what the habitat can support.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-005)

Proposal 221

5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(15)		
Unit 17(A)		
Up to 2 moose per regulatory year only as follows:		
RESIDENT HUNTERS: 1 moose by registration permit only; or	Aug. 25–Sept. 25 (Subsistence hunt only)	
...		
1 antlerless moose by registration permit only;	Jan. 1–last day of Feb. (Subsistence hunt only)	
....		

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

Antlerless moose hunts must be reauthorized annually by the board. The department management goals are to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support populations. They also help regulate moose population growth, help to meet intensive management (IM) objectives for high levels of harvest, and provide subsistence hunters with the opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The board adopted an antlerless moose hunt in 2013 after hearing many comments from the public including those from groups such as the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, and the Togiak National Wildlife Refuge.

The Unit 17A moose management plan calls for antlerless moose hunting opportunity when the population is above 600 moose and increasing. When the population exceeds 1,200 moose, a bag limit of up to two moose is needed to provide increased opportunity to reduce moose abundance to protect habitat. Based on the most recent survey in March 2026, the population estimate with sightability correction was $1,846 \pm 256$ moose. This is a decline from the previous 2022 estimate of $1,976 \pm 218$, but remains above the population objective. The bag limit of two moose combined with antlerless harvest opportunity provide a mechanism to limit population growth and allow hunters to harvest surplus animals.

The moose population in subunit 17A is over objective and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-011)

Proposal 222

5 AAC 84.045(a)(12). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose draw permits in Units 14A and 14B as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
Unit 14(A)		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 2,000 antlerless moose permits may be issued; or	Aug. 20–Sept. 25 (General hunt only) Nov. 1–Dec. 25 (General hunt only)	No open season
...		
1 moose by targeted permit only; by crossbow, shotgun or bow and arrow only; up to 200 permits may be issued	Winter season to be announced (General hunt only)	No open season
Unit 14(B)		
1 moose per regulatory year, only as follows:		
...		
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued.	Winter season to be announced (General hunt only)	No open season
....		

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

Antlerless moose hunts must be reauthorized annually by the Board of Game. There are two types of antlerless moose hunts in the Matanuska-Susitna Valley—a drawing permit hunt used to regulate growth of the moose population in Unit 14A, and targeted hunts used to mitigate public safety concerns in Units 14A and 14B.

Antlerless moose hunts have been authorized in Unit 14A since 2001 in order to regulate the growth of the population. The permit level was increased from 450 to 1,000 in 2013 to account for the continued increase in the population and again in spring 2018 from 1,000 to 2,000. Increased harvest based on the increased permit levels has brought the population back to near the population objective for the unit of 6,000–6,500 moose. The department has reduced permit levels significantly as the population has approached the objective and will continue to adjust them as necessary.

Moose surveys conducted in November 2023 yielded an estimate of 6,657 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2020 survey estimate of 7,112 moose. This indicates that antlerless harvests are having the desired effect of reducing the population to near objectives. The sex and age composition demonstrated a bull ratio of 30 bulls:100 cows and a calf ratio of 28 calves:100 cows. The Unit 14A moose twinning rate has been 28% in both 2024 and 2025, the highest since 2017, and has been trending upwards since the low of 15% in 2021; likely indicating population growth.

Moose-human conflicts have declined along with the moose population as it has approached the population objective. The targeted moose hunts in Units 14A and 14B, which are authorized to include an antlerless component, have been a tool to address public safety concerns related to moose-vehicle collisions and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 278 moose per year were killed in the Matanuska-Susitna Valley area during the last five years of average snowfall, which is lower than the previous 5-year average; substantially more moose are killed during higher snowfall years. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt opportunity. Antlerless hunts are an important tool to control the moose population’s trajectory and provide additional moose hunting opportunity in the Matanuska-Susitna Valley when appropriate.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-008)

Proposal 223

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

Reauthorize the antlerless moose seasons in Unit 14(C) as follows:

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

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		
Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloading black powder rifle only; up to 50 permits may be issued		
Unit 14(C), that portion		

of the Ship Creek drainage
upstream of the Joint Base
Elmendorf-Richardson (JBER)
Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
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...

Remainder of Unit 14(C)

1 moose per regulatory year,
only as follows:

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
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1 bull by drawing permit only, by bow and arrow only; up to 10 permits may be issued	Oct. 20—Nov. 15	No open season
--	-----------------	----------------

...

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

Antlerless moose hunts must be reauthorized annually, and the department recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population objective of 1,500 moose. This population size reduces over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and starvation during severe winters. Antlerless hunts also provide additional moose hunting opportunities with minimal controversy among resource users.

Moose in Unit 14C are managed intensively for a population objective of 1,500–1,800 moose and an annual harvest objective of 90–270 moose (5AAC 92.108). The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. In 2013, the department estimated that the moose population contained approximately 1,533 moose in Unit 14C from a combination of population census, composition surveys, and extrapolation to unsurveyed areas. A combined 2024 aerial composition count of the JBER Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14(C)) found 233 moose. A bull:cow ratio of 44 bulls per 100 cows and a calf:cow ratio of 14 calves per 100 cows observed was an increase from 2023 ratios. Overall population estimates, and calf:cow ratios, are still slightly down from before the winter of 2022 when persistent, deep snow likely resulted in additional winter mortality and an increase in the late winter energetic demands on pregnant cows.

Harvest numbers continue to remain relatively steady, and at this population level we have received fewer reports of human-moose conflicts and moose-vehicle collisions. Harvesting cow moose is paramount to maintaining the population at the low end of the objective while still providing harvest opportunity.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-007)

Proposal 224

5 AAC 085.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(13) hunting seasons and bag limits for moose in Unit 15 are as follows: ...		
Unit 15(B), Kalgin Island		
1 moose per regulatory year, by registration permit only ...	Aug. 20—Sept. 25	Aug. 20—Sept. 25

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

Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective of 20-40 moose.

In 1995, in response to concerns that the moose population on Kalgin Island had exceeded the island's carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt for antlerless moose. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective. Antlerless hunts, such as RM572, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat.

During the most recent moose survey in November 2025, department staff counted 136 moose on Kalgin Island. In the last 5 years, the department issued an average of 107 permits for this hunt, of which 74 permittees hunted, yielding an average annual harvest of 23 moose. Tracking harvest over time provides an indicator of hunter effort and success rates; success rates on the island have remained high with a 5-year average of 31%.

The any moose registration hunt is recommended to reduce moose numbers on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make overharvest unlikely.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-009)

Proposal 225

5 AAC 85.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 15C as follows:

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

This proposal would reauthorize the antlerless moose hunt for the 15C Antlerless (DM549) and the targeted hunt (AM550).

Units and Bag Limits	Resident	Nonresident
	Open Season (Subsistence and General Hunts)	Open Season

(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(C), that portion from the mouth of Deep Creek easterly along the south bank of Deep Creek to N 59° 55.183', W 151° 8.155'; then southeasterly in a straight line to the unnamed creek at N 59° 54.342', W 151° 6.459'; and easterly down the south bank of this stream to Caribou Lake and easterly along the south shore to the outlet of Fox Creek, then south along the west bank of Fox Creek to the mouth of Fox Creek, and along the mean high tide line to the point of origin

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the nonresident drawing hunt: or

Oct. 20—Nov. 20

...

1 moose by targeted permit only[,] Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the resident drawing hunt Oct. 20—Nov. 20

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only Oct. 15—Mar. 31

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

Antlerless moose seasons must be reauthorized annually by the Board of Game. The department recommends reauthorization of the 15C antlerless hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in Unit 15C for the 2027-28 hunting season.

In February 2023, a geospatial population estimator (GSPE) census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in an initial population estimate of 5,162 moose (95% CI: 3,934–6390), of which 22% (95% CI: 15–28) were calves. This equates to a density of approximately 4.4 moose/mi² in the census area and indicates the population has continued to grow since 2010. However, the spatial distribution of moose during winter is heavily skewed away from elevations > 1000 feet in Unit 15C. This creates high variance of moose abundance in grid cells and removal of a single high density grid cell from the GSPE census reduces the population estimate to 4,486 moose (95% CI: range 3,581–5391), of which 22% (95% CI: 14–28) were calves. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be at or above the upper end of the intensive management population objective of 3,500 moose. Fall composition counts in

core count areas during November 2025 provided a bull ratio of 28 bulls:100 cows. Antlerless hunts, such as DM549 and AM550, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat.

The lowlands in Unit 15C, south of Deep Creek and Caribou Lake, which encompass the hunt boundary of DM549, contain high densities of moose when deep snow drives moose to lower elevations. The human population continues to grow in this area and, according to U.S. Census Bureau statistics, has doubled in size since the 1980s. Negative interactions with humans can occur as moose become more aggressive in their search for food around human residences in years of low food abundance. In 2023, the hunt area was expanded to reduce hunter conflicts with private property owners. Fifty to 65 permits were issued in each of the last 10 years resulting in an average harvest of 26 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 65 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year depends on existing conditions, and it is possible no permits will be issued in some years.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-010)

Proposal 226

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

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C) as follows:

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

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(5) ... Unit 7, the Placer River drainages, and that por- tion of the Placer Creek (Bear Valley) drainage		

outside the Portage
Glacier Closed Area, and
that portion of Unit 14(C)
within the Twentymile
River drainage

RESIDENT HUNTERS:

1 moose by drawing permit
only; up to 60 permits
for bulls will be issued in
combination with nonresident
hunts, and up to 70 permits for
antlerless moose will be issued

Aug. 20—Oct. 10
(General hunt only)

NONRESIDENT HUNTERS:

1 bull by drawing permit only;
up to 60 permits for bulls
will be issued in combination
with resident hunts

Aug. 20—Oct. 10

...

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

Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorizing the antlerless hunt in Units 7 and 14C. The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters and sharp reductions during severe winters. In 2009, antlerless permits were issued for the first time since 2004. The number of permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A November 2024 aerial composition count of moose in the Twentymile, Portage, and Placer River drainages found 203 moose with a bull:cow ratio of 33 bulls per 100 cows and a calf:cow ratio of 23 calves per 100 cows. This is the highest overall count in the Twentymile survey area since 2003 with an increase in the bull:cow ratio and an average calf:cow ratio.

The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. This allows for a healthier and more productive moose population due to decreased stress levels associated with winter food shortages. This hunt has been successful in creating additional moose hunting opportunity with little or no controversy.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-006)

Proposal 227

5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

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

5AAC 92.015. Brown bear tag fee exemption

(a) A resident tag is not required for taking a brown bear in the following units:

(1) Unit 11;

(2) Units 13 and 16(A);

(3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

(1) Unit 9(B);

(2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);

(3) Unit 17;

...

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

Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 and are managed primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The bear seasons and bag limits adopted along with the elimination of the tag fee were intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-021)

Proposed Changes Outside the Board of Game’s Authority

The following proposals request changes that the Board of Game does not have authority to adopt. They are included in the book for review, comment, and discussion at the applicable meetings if the board desires.

The Board does not have the authority to amend a statute; allowing certain non-resident hunters to hunt brown bears with an Alaska resident not within the second degree of kindred under AS 16.05.408 would require an act by the Alaska Legislature. The board does not have the authority to establish or change fees related to hunting because they are established in statute; changes to tag fees in AS 16.05.340 would require an act by the Alaska Legislature.

Proposal 228

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

a non-resident who has owned a property capable of habitation (a cabin, house, etc) should be allowed to purchase an non-resident brown bear locking tag at the non-resident fee and to be able to hunt with a guide, a second degree of kindred, or an Alaskan resident for brown bears

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

For predator control areas (and possibly across Alaska) there should be an added provisions for brown/grizzly bears where a non-resident who has owned a property capable of habitation (a cabin, house, etc) should be allowed to purchase an non-resident brown bear locking tag at the non-resident fee and to be able to hunt with a guide, a second degree of kindred, or an Alaskan resident for brown bears in certain areas.

I believe you would not impact the guides who are booked for several years out normally and you would have more bears taken in these areas and could avoid government depredation activities.

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

No

PROPOSED BY: Stephen Nance (OI-F26-016)

The Board of Game does not have authority to regulate Guides. Guides are regulated by the Big Game Commercial Services Board.

Proposal 229

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

Solution recommended is to not allow commercial guiding within the staking area.

The new regulation would state :

No commercial guiding of hunters is allowed within the 26 square mile area designated by the Alaska Department of Natural Resources for the remote recreational cabin staking.

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

The issue to be addressed is the commercial guiding of hunters in the Land Staking Area. This area is the 26 square miles designated by the Alaska Department of Natural Resources for the remote recreational cabins. It has approximately 18-20 parcels privately owned.

There is plenty of other area for the commercial guiding to take place, other than the staking area.

It causes conflict with the landowners that hunt local to their property and is a bad experience for the guided clients paying an astronomical fee for the service.

If this regulation is not instated, the Alaska wilderness hunting & recreational experience that folks come to expect will be severely tarnished.

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

I have spoken with another local land owner & previous land owners that sold their property due to the bad experiences they had. The bad experiences stemmed from the commercial guiding outfit operating adjacent to them.

PROPOSED BY: James Knowles (OI-F26-049)

The Board of Game does not have authority to regulate Guides. Guides are regulated by the Big Game Commercial Services Board.

Proposal 230

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

****Prohibit all big-game outfitting and guiding activities, including the establishment or use of field camps and motorized air, ground and water transport of hunters, within two miles of a remote permanent dwelling that is not owned or leased by the big-game business. A remote dwelling in this regulation is defined as any permanently enclosed structure made for human habitation that is at least seven miles from a publicly maintained road. Motorized air and land transport of hunters would be allowed within the prohibited area by professional big-game outfitting and guiding businesses only when necessary for the transit of hunters/clients to an area beyond two miles of permanent dwellings, as long as no hunting or field camps occur within the prohibited area. Motorized air transport (drop-off or pick-up only) of hunters by professional big-game guiding and outfitting businesses is allowed within the prohibited area if no field camp is established within the prohibited area, except for those temporary camps made by hunters awaiting an air pickup utilizing a professional big-game guiding or outfitting service. This regulation does not apply to the hunting of deer, mountain goat or bear within five miles of a coastline or on a coastal island, when accessing a public-use cabin, or in instances where all owners of remote permanent dwellings agree to allow such professional big-game activities within two miles of their dwelling. Emergency extraction of hunters and their gear would be exempted by this proposal.****

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

Resident remote cabin owners are impacted by big game hunting businesses causing impacts to them at their remote cabins. Big-game outfitting and guiding occurring near these properties cause unnecessary competition for game and inflict great disturbances on the cabin owners (i.e., plane and boat traffic noise, loss of privacy, etc.). Remote cabin owners have made huge sacrifices to establish a remote cabin seeking solitude, recreating experiences and sourcing wild game. It is unnecessary for professional big-game hunting services to impose on remote cabin owners when these businesses have the resources to operate in areas where their impacts are less to these residents. In my experience, after building a remote cabin 65 miles from the nearest village, a big-game hunting business acquired property near mine and I quickly became overwhelmed by fall big-game guiding activities that reduced the quality of my cabin and hunting experience and the value of my property.

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

I consulted with other resident owners/hunters possessing remote cabin properties.

PROPOSED BY: Robert Massengill (OI-F26-103)

The Board lacks the authority to amend a statute. Alaska Statute 16.05.789 prohibits hunting with firearms within five miles of either side of the Dalton Highway north of the Yukon River and Alaska Statute 11.61.210 prohibits shooting from, on, or across highways.

Proposal 231

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

*the remainder of the DHCMA is closed to hunting; however, big

game and fur animals may be taken in the area by bow and arrow only, and small game and may be taken by small caliber rimfire and waterfowl with shotgun by Alaska residents, and small game by falconry*

(Dalton Highway Corridor Management Area (DHCMA):

Units 20 and 24-26 extending five miles from each side of the

Dalton Highway, including the drivable surface of the Dalton

Highway, from the Yukon River to the Arctic Ocean, and including

the Prudhoe Bay Closed Area. The area within the Prudhoe

Bay Closed Area is closed to the taking of big game; the

remainder of the DHCMA is closed to hunting; however, big

game, small game, and fur animals may be taken in the area by

bow and arrow only, and small game may be taken by falconry)

The communities of Wiseman and Coldfoot will not have access to the valley floors on State lands under current DHCMA means restriction. Most small game harvest has occurred within the DHCMA valleys where travel is conducive to hunting small game. To meet the subsistence law and needs of these communities for small game and waterfowl I request the Alaska Board of Game repeal the closure to small game harvest except for bow and arrow only, to include small game and waterfowl harvest with small caliber rimfire firearm for harvest of small game and waterfowl with shotgun for all Alaska residents only.

The current restriction to bow and arrow only small game has very little harvest.

The sustained yield harvestable surplus is not being met by the BOG and Alaskan resident subsistence users. These Communities meet all 8 criteria for the BOG to make a Customary and Traditional finding for small game.

Subsistence harvest with archery only take of small game does not meet the eight criteria in the state subsistence statute and regulations. Archery equipment and arrows are very expensive, not efficient in the

economy of time and effort. Residents of Alaska are provided a priority use for Subsistence harvest with consideration of these factors.

Criterion 3: Methods and means of harvest,

A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.

There are several documents that substantiate the continues subsistence use of small game and waterfowl by Wiseman and Coldfoot residents.

"Arctic Village" Robert Marshall published 1933, Chapter "Living off the Country"

Thesis study Carol P Scott UAF 1991-1993 " Continuity and Change in Wiseman Area of Alaska" multi year investigation.

Alaska Department of Fish and Game Division of Subsistence 2011 Alaska Pipeline Project

Malla Kukkonen and Ted Krieg

Chapter 8 Coldfoot by Malla Kukkonen

Chapter 9 Wiseman by Malla Kukkonen

Criterion 1: Length and consistency of use

A long term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.

Criterion 2: Seasonality

A pattern of taking or use recurring in specific seasons of each year.

Criterion 3: Methods and means of harvest

A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.

Criterion 4: Geographic areas

The area in which the noncommercial, long term, and consistence pattern of taking, use, and reliance upon the fish stock and game population has been established.

Criterion 5: Means of handling, preparing, preserving, and storing

A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.

Criterion 6: Intergenerational transmission of knowledge, skills, values, and lore

A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.

Criterion 7: Distribution and exchange

A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.

Criterion 8: Diversity of resources in an area; economic, cultural, social, and nutritional elements

A pattern that includes taking, use, and reliance for subsistence purposes upon a wide variety of fish and game resources that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

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

The firearm legislative statute SCSHB 207 enacted in 1980 closes the area to the use of firearm for Big Game. The BOG used and defined the 5 miles either side of the road alignment from the Yukon to the the Prudhoe Bay closed area, and opened the area to take of Big Game in 1980. In 1983 the BOG closed the DHCUA to take of small game with a firearm.

People in Coldfoot and Wiseman commented extensively that small game subsistence harvest was a significant food resource, and was a necessary activity for training young hunters with small caliber rimfire .22 rifles. The state subsistence law was ignored by the Board at that time. The communities of have been here in what is the DHCMA since 1900 and 1908 using these resources.

The local people eventually prevailed with Federal Regulations to take small and large game under federal subsistence regulations with the use of firearm. The state selected the Utility corridor which was attached on March 26, 2026. We are back before the BOG again.

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

As a subsistence user I have spoken to the local users here in this area about how to regain our customary and traditional harvest of small game and waterfowl. The local people are very supportive of moving this proposal forward. The Koyukuk River AC will review this proposal at our early winter meeting.

PROPOSED BY: Jack Reakoff (OI-F26-140)

The Board of Game does not have authority to regulate Guides and Transporters. Guides and Transporters are regulated by the Big Game Commercial Services Board.

Proposal 232

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

No person, commercial transporter, or guided service shall drop off or position a hunting party within one-half (½) mile of another known occupied hunting party's drop-off location. This applies to all methods of transportation including aircraft, watercraft, motorized and non-motorized ground vehicles, and personal conveyance. Prior to drop-off, transporters and hunters shall make reasonable effort to determine if another party is already occupying the area. Violation of this regulation shall be subject to existing penalties under Alaska hunting and transporter licensing statutes.

[NO EXISTING REGULATORY LANGUAGE TO DELETE — THIS IS A NEW ADDITION]

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

Hunters are being dropped off in close proximity to one another, creating ethical, safety, and fair-chase concerns. This applies to all hunters whether using commercial transporters, guided services, or personal equipment.

Proposed Change: No hunter drop-off shall occur within ½ mile of another occupied hunting party.

Why This Matters: Without this regulation, hunters are placed on top of one another, diminishing hunt quality, increasing conflict risk, and violating ethical standards Alaska's hunting traditions are built upon.

Alternatives Considered: Voluntary compliance and transporter self-regulation were rejected, as there is no enforceable standard and competitive pressure incentivizes transporters to place clients in prime locations regardless of others present.

If Nothing Changes: Overcrowding will worsen, fair-chase principles will erode, and hunter conflicts will increase, damaging Alaska's reputation as a premier ethical hunting destination.

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

Yes i spoke to other hunters and locals who have experienced issues with guides and transports fighting over prime land. I have worked with non-residents too who have been dropped on withing 400 feet of another camp.

PROPOSED BY: James Haveron (OI-F26-144)

Tag fees are established in state statute by the Alaska Legislature. The Board does not have the authority to establish or change fees related to hunting.

Proposal 233

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

Waive non-resident tag fees in the areas where the bag limit is more than one black per year bear. Precedent is established with wolf tags under the current Statute and Regulations.

Example of regulatory language:

Unit 19 Black Bear * No Non-Resident Tag Required Five Bears No Closed Season

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

Lack of participation of hunters in areas where the bag limit is multiple bears. Non-resident hunters will often not take bears due to the cost of tags. Particularly in intensive management and predator control areas where the goal is reduce predator numbers to increase calf survival.

Non-Resident black bear tag fees too costly preventing hunters from filling their bag limit. Reduce or eliminate tags fees for non-resident hunters.

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

PROPOSED BY: Jeff Pralle (OI-F26-168)
