

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

(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

July 1 - June 30

A COW;]

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

July 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

Aug. 1 - Sept. 30

5 AAC 85.025(a)(21) is amended to read:

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 Ongtowsruk 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 Ongtowsruk

(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	Nonresident
	(Subsistence and General Hunts)	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 Tisuk 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: Eric Leusch

(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 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 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 August15 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 Middl,e 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 on 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.

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.

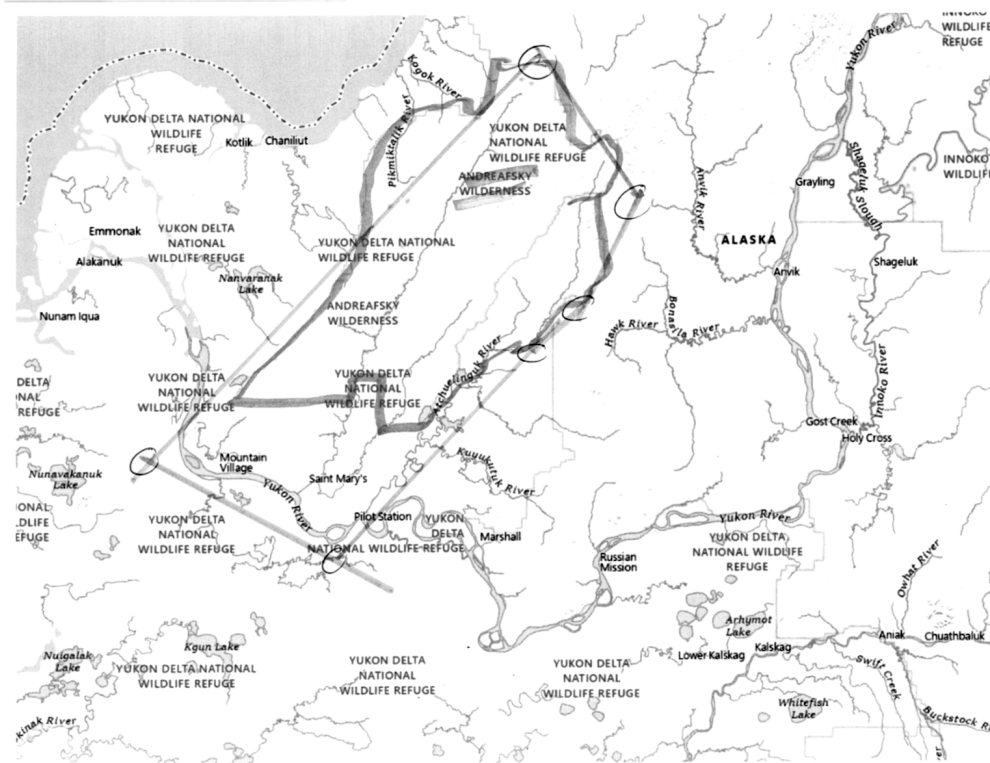
The regulation should read as follows:

(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], Chefornek 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

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

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)
