

Bethel Area - Unit 18

Proposal 54

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

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

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

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

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

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

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

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

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

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

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

Proposal 55

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

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

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

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

Unit 18:

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

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

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

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

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

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

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

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

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

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

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

Clarify existing regulatory obligations

This proposal would clarify how caribou present in the Cape Newenham and Goodnews Bay region are classified and managed. ADF&G currently identifies these animals as a distinct outlying group and excludes them from core Mulchatna population estimates, yet they remain regulated under MCH frameworks (Lichwa and Landsiedel 2025).

Establishing a localized management approach would resolve this inconsistency and align regulation with current biological understanding.

Improve or streamline procedures and permitting:

Establishing a localized management structure would allow for a clear and predictable permitting system (e.g., a registration-based subsistence hunt with a defined harvest cap), replacing the current situation where no pathway exists for legal harvest despite the presence of animals.

Reduce administrative burdens

A defined management structure with a fixed winter season (January-February) and conservative harvest limit would reduce the need for emergency actions or unclear enforcement situations, particularly in years when animals are present in accessible areas.

Improve communication procedures

This proposal would provide clear guidance to local residents regarding when and how caribou may be harvested. Aligning regulations with ADF&G-recognized population structure will reduce confusion and improve compliance.

Provide greater transparency with respect to standards and decision-making

By establishing a defined season, harvest cap, and subsistence-only framework, the Board would create a transparent and consistent management approach. This proposal is directly supported by ADF&G findings that the Cape/Goodnews group functions independently from the core Mulchatna herd and may be appropriate for separate management consideration (Lichwa and Landsiedel 2024).

References:

Lichwa, E., and J. Landsiedel. 2024. Mulchatna Caribou Herd Photo Survey Memorandum. Alaska Department of Fish and Game, Division of Wildlife Conservation.

Lichwa, E., and J. Landsiedel. 2025. Mulchatna Caribou Herd Photo Survey Memorandum. Alaska Department of Fish and Game, Division of Wildlife Conservation.

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

Togiak fish and game advisory committee

PROPOSED BY: Togiak Fish & Game Advisory Committee (OI-F26-087)

Proposal 56

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

Allow the take of caribou from a motor driven boat in GMU 18 as follows:

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

Allow the take of caribou from a motor driven boat in GMU 18.

5 AAC 92.080. Unlawful methods of taking game; exceptions.

The following methods of take are prohibited:

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

(A) motor-driven boat may be used as follows:

(i) *in Units 23 and 26 to take caribou;*

(ii) *notwithstanding any other provision in this section, in Unit 22 to position hunters to select individual wolves for harvest;*

(iii) *under authority of a permit issued by the department;*

(iv) IN UNIT 18 TO TAKE CARIBOU (AND MOOSE*)

Moose is being addressed through a separate proposal Moose is being addressed through a separate proposal

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

The take of caribou from a motor driven boat under power is a common and customary practice throughout Unit 18. The requirement to shut off a boat's motor before shooting is often impractical and unsafe. Currently, State and Federal regulations differ in allowing the take of caribou from a motor driven boat in Unit 18. This creates regulatory complexity for hunters and puts local people at risk of breaking the law, getting citations, and personal injury when carrying out traditional hunting practices.

Safety concerns are the primary reason for seeking this regulatory change. Water and weather conditions throughout the Yukon-Kuskokwim Delta (YKD) are highly variable and can change rapidly when out hunting. Fall storms are increasing in severity, and these storm surges create higher than normal water and faster currents, adding to the concerns. Having full control of the boat is of utmost importance for safety. If a driver has to shut off the motor, they can no longer effectively navigate obstacles that may pop up such as rocks, sweepers, or sandbars, nor can they keep the boat positioned appropriately in the current, which can often be strong.

As mentioned, hunting from a boat under power is a longstanding practice in Unit 18, similar to how residents of Units 23 and 26 harvest caribou in this manner and have been able to legally do so for decades. Customary and traditional methods and means, such as hunting from a motor driven boat, are characterized by efficiency and economy of effort. Starting and stopping a boat motor is not efficient, requires unnecessary effort, and can put hunters at a safety risk.

YKD residents grow up riding in and hunting from boats from a young age. To ensure safety when hunting from a boat, it is customary to select a designated shooter and for them to be positioned in the bow of the boat facing away from any other passengers and toward the shore. When an animal is spotted, the boat driver slows down and positions the boat for a safe and effective shot by the shooter. The requirement to shut off the boat's motor prevents this safe practice from occurring.

Adoption of this proposal would help make traditional hunting methods legal and reduce regulatory complexity. Hunting parties would still have the choice to shut off their boat motor if they deemed it to be safer in their given conditions. As this method of hunting is already practiced, there is no expected increase in hunting accidents. Rather, it would reduce the likelihood of accidents due to the safety concerns with shutting off boat motors as previously stated.

Statewide Federal regulations do not require a boat's motor to be shut-off to take an animal, but do require forward momentum from the boat's motor to have ceased unless otherwise allowed in Unit specific regulations. The take of caribou from a boat moving under power has been legal in Unit 18 under Federal subsistence regulations since 2000.

The YKDRAC is submitting two proposals to the Alaska Board of Game this cycle seeking to align State regulations with Federal ones and allow the take of caribou and moose from a boat moving under power and legalize this longstanding practice.

Legalizing this method of take will not lead to increased harvest of caribou. There is currently no open season for caribou in Unit 18 and the YKDRAC fully supports continued conservation and rebuilding of the Mulchatna Caribou Herd.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. The issue of take of moose and caribou from a boat moving under power was discussed at two separate YKDRAC public meetings and resulted in development of two BOG proposals seeking to legalize this common way of hunting.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-114)

Proposal 57

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

Lengthen the resident only registration moose hunt RM620 in Unit 18 by two weeks to end October 15 as follows:

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

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

Lengthen the resident only registration moose hunt RM620 in Unit 18 by two weeks to end October 15 as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose. (a)(16)

. . . Unit 18, that portion that drains into Kuskokwim Bay south of Carter Bay drainage (59° 10.8' N; 162° 0.2' W) drainage 1 antlered bull by registration permit only Sept. 1 – Oct. 15 [SEPT. 30]

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

Moose are an important subsistence resource for members of the Goodnews Bay and Platinum villages. Due to the increase in food costs, the villages remote locations, and changing environmental factors, food security is a significant and growing concern. Importantly, since 2020, subsistence hunters have not hunted caribou from the Mulchatna caribou herd due to low population numbers. The Mulchatna caribou herd has historically been one of the villages primary food sources. Thus, there is an increased reliance on moose hunting to meet subsistence needs, and the moose population in the area near Goodnews Bay and Platinum

have seen an increase in moose population. As the moose population has increased the quota for the fall hunting season has also increased. For the last 10 years we have not come close to meeting this quota.

Extending the season date to October 15th would align the RM 620 hunt with around RM 617 and RM 615 to the north. This increased opportunity where to help local hunters put meat in the freezer and help the department come closer to meeting its quota. Five of the last six years, Goodnews Bay has asked for an extension and we've been given an extension to the 15th of October. This would save time and effort for both residents and biologists to extend the season permanently. In the last few years the harvest quota has been 40 or more moose but the number of registration permits given out has been less than 30. There's little to no danger of over harvesting with the extended time. With difficulty of getting permits out to villages due to our remoteness, it would be nice if a limited amount were available online.

The hunting season in Quinhagak RM617 and RM615 Zone 2 adjacent to the north of Goodnews Bay drainage is open from September 1 to October 15 in unit 18 hunt area. The Goodnews Bay and Platinum villages propose that its season be extended by 15 days to match those seasons and provide a more meaningful opportunity for Goodnews Bay and Platinum residents to meet subsistence needs.

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

PROPOSED BY: Janet Bavilla

(HQ-F26-002)

Proposal 58

5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Modify the RM615 hunt boundary description as follows:

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

Unit 18 Kuskokwim Area, that portion easterly of a line from the mouth of the Ishkowiik River to the closest point of Dall Lake then to east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (60 59.41' N. latitude, 162 22.14' W. longitude), continuing upriver along a line one-half mile south and east of, and paralleling a line along the southerly bank of the Johnson River, **continuing a half mile south and east of Crooked Creek past its confluence** [TO THE CONFLUENCE OF THE EAST BANK OF CROOKED CREEK, THEN CONTINUING UPRIVER ALONG THE EAST BANK OF CROOKED CREEK TO THE OUTLET AT ARHYMOT LAKE, THEN FOLLOWING THE SOUTH BANK OF ARHYMONT LAKE EASTERLY] to the Unit 18 border and north of and including the Eek River drainage

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

The Unit 18, 19A and 21E border was modified at the March 2014 Statewide Board of Game meeting in Anchorage but the RM615 hunt area was never updated to reflect that change. With the increased popularity and cost of hunting in Unit 18 remainder, some hunters are attempting to reach Unit 18 remainder by portaging from the Kuskokwim River in the area of this proposed border change. As written, the current boundary is ambiguous and continues into 19A to a Unit 18 boundary that no longer exists. The

proposed change provides and 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 Middle Fork Eek River, then southwesterly to end at 60° 4.983 N, 161° 37.14W

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

Moose Hunting in Zone 2, Change boundaries in Akulikutak and Kwethluk Rivers. Moose hunters from Kwethluk and surrounding villages have to travel 18 airmiles to the Zone 2 boundary using a lot of unleaded gasoline and often times have problems where some people do not reach the Zone 2 boundary when the river is low and have difficulty finding the main river channel.

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

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

PROPOSED BY: Chariton Epchook, Organized Village of Kwethluk (HQ-F26-001)

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

Proposal 61

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

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

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

Proposal Summary

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

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

Proposed Management Area Description

Attached to this proposal are PDF files and screenshots generated using Google Earth that provide a visual reference for the proposed Lower Yukon River Management Area and the five proposed draw permit hunt areas. These materials illustrate the general boundaries and land that would be encompassed by the

LYRMA and are intended solely as a conceptual aid to assist the Board in understanding the scope and intent of the proposal. KMZ files have also been created showing the outline of the proposed LYRMA that can be provided if necessary.

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

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

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

The apparent complexity of the proposed LYRMA boundaries is intentional. The boundaries were designed to be as narrowly tailored as possible to avoid unnecessarily including lands that could be utilized by transporter services or hunting guides, while still fully encompassing areas that are regularly

accessed by residents using motor-driven boats for subsistence hunting. The two-mile buffer extending from the outermost shoreline accessible by motor-driven boat is necessary to achieve the intent of this proposal, as it ensures that nonresident hunting pressure in boat-accessible areas is effectively limited without a draw permit and cannot simply shift slightly inland to avoid regulation. This approach is intended to minimize impacts to air-based hunting activities occurring outside of motorboat-accessible areas, while ensuring that boat-based subsistence hunters are not displaced or interfered with by increasing nonresident pressure.

Tributary Boundaries

The coordinates below mark the extent of the proposed LYRMA along the identified tributaries. These

boundary points were selected based on where motor-driven boat access is achievable under typical conditions.

River / Tributary	Upstream Boundary (Latitude / Longitude)
Kuyukutuk River	61°57'14.74" N, 161°37'50.20" W
Nageethluk River	62°12'28.91" N, 161°11'03.30" W
Atchulinguk River	62°52'14.75" N, 161°26'06.13" W
East Fork Andreafsky River	63°01'53.81" N, 161°41'58.03" W
Andreafsky River	63°01'34.36" N, 162°01'00.49" W
Allen Creek	62°29'48.98" N, 163°03'00.56" W
Archuelinguk River	62°15'06.32" N, 163°33'05.87" W
Kashunuk Slough 1	61°47'39.48"N, 162°44'26.03"W
Kashunuk Slough 2	61°51'51.59"N, 163°20'31.82"W
Kashunuk River	61°47'12.61"N, 163°38'12.19"W

Nonresident Moose Hunting Pressure (Unit 18)

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

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

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

Rationale and Justification

User Conflict and Subsistence Concerns

Increased nonresident hunting pressure along the Yukon River and its tributaries has led to escalating user conflicts between residents and nonresident hunters. The lower Yukon River in Unit 18 is home to several thousand rural residents, and the area is also becoming increasingly important for non-local Alaska residents seeking to harvest moose for their families. The proposed Lower Yukon River Management Area (LYRMA) encompasses the navigable waters of the lower Yukon River and its tributaries, which effectively function as the region's road system for Alaska residents. As nonresident hunting pressure has increased, crowding and competition in these travel corridors have intensified, leading to more frequent conflicts on the landscape. These conflicts can directly affect residents' ability to meet subsistence needs and carry out traditional hunting practices.

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

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

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

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

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

Federal Subsistence Board Risk

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

However, growing concerns regarding:

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

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

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

Biological and Management Considerations

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

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

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

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

Permit Structure

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

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

September Draw Permit Distribution

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

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

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

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

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

Guided Hunting and Transporting on Native Corporation Lands

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

The same approach could be applied within the LYRMA if necessary. Under this structure, nonresident hunters who are not accompanied by a registered guide or a resident second-degree of kindred would be subject to the proposed draw permit structure and allocation within the LYRMA, while nonresident hunters using a registered guide or accompanied by a resident second-degree of kindred could continue to hunt under a harvest ticket within the LYRMA. Allowing nonresident hunters to accompany resident

relatives under the second-degree-of-kindred provision is unlikely to create meaningful additional hunting pressure, as this opportunity is naturally limited to situations where a resident family member is present and willing to host the hunt. In contrast, the primary source of increased hunting pressure in many accessible areas has come from growing numbers of do-it-yourself nonresident hunters traveling independently. Structuring the regulation to focus on that segment of hunting participation helps address the underlying pressure concerns while preserving traditional opportunities for residents to share hunting experiences with visiting family members.

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

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

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

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

Air Traffic Consideration

Another concern expressed by rural residents is the growing number of hunters utilizing airplanes in the lower Yukon area. Current YDNWR regulation should be preventing commercial users like hunting guides or transporters from dropping hunters in the majority of the proposed LYRMA, but there still could be other Alaska residents utilizing personnel planes within its boundaries. The board could consider also prohibiting the use of Aircraft for moose hunting within the boundaries of the proposed LYRMA to address this concern. Language from the Koyukuk controlled use area is listed below and could be applied easily to the proposed LYRMA if the board deemed that was an appropriate measure to take. *“The area is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, or parts of moose; however, this provision does not apply to the transportation of moose hunters, their*

hunting gear, or parts of moose by aircraft between publicly owned airports, or the transportation into the area of game meat that has been processed for human consumption.”

Conclusion

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

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

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

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

Approximate, illustrative depiction of the proposed management area



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

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

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

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

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

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

Proposal 62

5 AAC 92.540. Controlled use areas.

Establish the Andreafski Wilderness Controlled Use Area (CUA) within Unit 18 and restrict the use of aircraft in the new CUA as follows:

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

The Board should establish the **Andreafski Wilderness Controlled Use Area** within Unit 18 with exact boundaries to be determined in coordination with others.

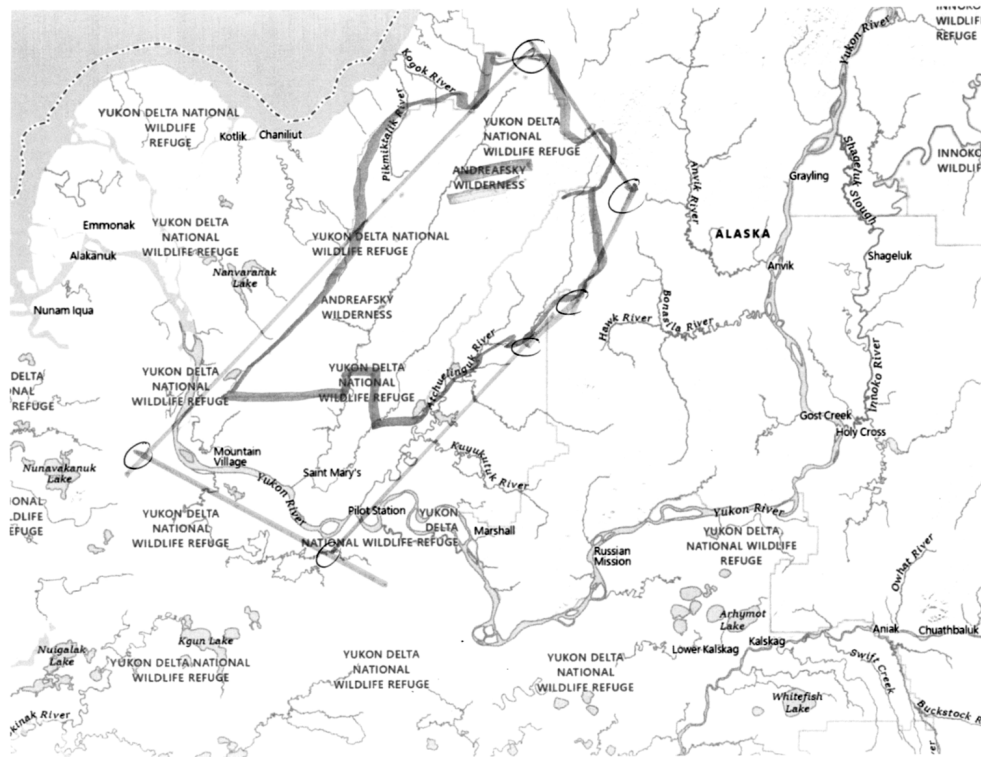
The regulation should read as follows:

(6) Unit 18:

(B) the Andreafski Wilderness Controlled Use Area:

- (i) the area consists of that portion of Unit 18 bounded by a line beginning at 61° 48.76' N. lat., 162° 55.72' W. long. on the Yukon River near Pilot Station, then to 62° 08.28' N. lat., 164° 11.25' W. long., then to 63° 12.85' N. lat., 161° 39.03' W. long., then to 62° 57.67' N. lat., 161° 09.10' W. long., then to the Yukon River, then along the north bank of the Yukon River back to the point of beginning and also include the Black River Drainage area and all of its tributaries. A rough draft map is included with this proposal to show the general area but does not include the Black River area that was added to this proposal.
- (ii) the area is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, or parts of moose; however, this provision does not apply to the transportation of moose hunters, their hunting gear, or parts of moose by aircraft between publicly owned airports, or the transportation into the area of game meat that has been processed for human consumption;

- (iii) the meat of the hindquarters, forequarters, and ribs of any moose taken in the area must remain on the bone until the moose has been transported out of the area or processed for human consumption;
What is the issue you would like the board to address and why?



**A color version is available online at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>*

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?

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

(16)

Unit 18 Kuskokwim Area, that portion easterly of a line from the mouth of the Ishkowitz 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 paralleling a line along the southerly bank of the Johnson River 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

...

1 antlerless moose by drawing permit only, up to 100 permits may be issued

Sept. 1-Oct. 15

No open season.

...

Unit 18, that portion that drains into Kuskokwim Bay south of the Carter Bay drainage

...

1 moose by registration permit only; to be announced by emergency order

Dec. 1—Mar. 31
(Season to be announced)

No open season.

Remainder of Unit 18

RESIDENT HUNTERS:

3 moose; of which only 1 may be an antlered bull; a person may not take a calf or a cow accompanied by a calf; or

Aug. 1—Sept. 30

3 antlerless moose; or

Oct. 1—Nov. 30.

3 moose

Dec. 1—April 30.

NONRESIDENT HUNTERS:

1 antlerless moose

Dec. 1— Mar. 15

...

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

To be retained, the antlerless moose seasons in Unit 18 must be reauthorized annually by the Board of Game (board). The current antlerless hunts in the Remainder of Unit 18 were adopted at the January 2014 board meeting in Kotzebue. The current antlerless hunt in the Goodnews Hunt area and nonresident antlerless hunt was adopted at the January 2017 board meeting in Bethel. The Kuskokwim hunt was adopted at the January 2024 board meeting in Kotzebue. Both the Remainder and Goodnews antlerless hunts were amended at the board meeting in 2020 in Nome. The board has previously reauthorized the antlerless moose season for resident hunts in Unit 18 remainder for regulatory year (RY) 2016 through RY2026. This proposal requests reauthorization for RY2027.

Implementation of antlerless hunts began in 2007 and has continued each year due to increased moose abundance, productivity, and population growth along the Yukon River drainage in Unit 18. Based on the steady growth in moose populations and productivity, ADF&G proposes continued antlerless moose hunts in the Remainder of Unit 18.

Within the areas near the Yukon River, the moose population is estimated to be 20,000 animals with calf:cow ratios ranging from 36:100 to 61:100, and twinning rates from 15% to 50% for all areas. Population growth and range expansion continues in this portion of Unit 18. Although the population has declined by about 20% in the past 5 years it is still remains near historic highs.

Although the current year's harvest data in the Remainder of Unit 18 has not been finalized because the season is still open, harvest is expected to be similar to the past 4 years and well below sustained yield for this robust population. In RY2024 the antlerless harvest in Unit 18 remainder was 147 moose. Allowing antlerless harvest will benefit hunters through increased opportunity, and any increases in harvest may help slow the growth rate of the population in this portion of Unit 18. Additionally, the nonresident antlerless moose hunt has had very low participation, and in 2024 there were 4 cows harvested by nonresidents. Nonresident harvest has been eight antlerless moose (all cows) in the previous past 5 years.

The moose population in the Goodnews River drainage had grown steadily in the past 15 years following a closure in 2004. The fall hunt had a quota of 10 for the first few years of the hunt and recently increased to 45. Even though the department has not closed the season by emergency order, in the past few years the quota was not meet. In the 7 years that the winter hunt has been held, harvest has been low (with a range of 0-6 animals harvested). The March of 2024 survey found 450 moose and, based on the steady growth in moose populations and productivity, the department proposes continued antlerless moose hunts in the Goodnews River Drainage.

In January of 2024 at the board meeting in Kotzebue, the board adopted a drawing hunt for antlerless moose on the Kuskokwim River. The first hunt was held in the fall of 2025. In February of 2024, the midpoint of the population estimate was 3,336 moose in Zone 1 of the Kuskokwim hunt area. In the same month, an additional 2,327 moose were counted in a minimum count of zone 2 of the hunt area. In the DM612 hunt, in the fall of 2025, the department issued 100 permits. Of these, 84 permit holders reported hunting, and 49 harvested antlerless moose. Following a moratorium the Kuskokwim moose population has experienced

rapid growth and range expansion and is starting to see early signs of resource limitation and high browse removal rates.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-012)

Proposal 66

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

Restrict the sale of moose antlers in Unit 18, unless naturally shed or used in handicraft as follows:

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

This regulation would limit the sale of moose antlers in unit 18 to only those that are naturally shed.

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

92.200(b)The antler of a moose taken in unit 18, unless the antler is a naturally shed antler or has been made into a article of handicraft;

92.200(c) the antler of a moose taken in unit 18, unless the antler is an article of handicraft;

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

PROPOSED BY: Pitka's Point Traditional Council (OI-F26-043)

Proposal 67

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

Limit the sale of moose antlers in unit 18 to only those that are naturally shed as follows:

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

This regulation would limit the sale of moose antlers in unit 18 to only those that are naturally shed.

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

92.200(b)The antler of a moose taken in unit 18, unless the antler is a naturally shed antler or has been made into a article of handicraft;

92.200(c) the antler of a moose taken in unit 18, unless the antler is an article of handicraft;

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

PROPOSED BY: Mid-Lower Yukon Fish & Game Advisory Committee (OI-F26-056)

Proposal 68

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

Upon harvested moose or at time of kill, a portion of the antler must be sawed off to destroy the trophy value as follows:

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

Upon harvested moose or at time of kill, a portion of the antler must be sawed off to destroy the trophy value.

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

The issue is illegal harvest, waste of moose and criminal activity and the effect of illegal taking of moose / head hunters / waste meat / illegal sale

Illegal activity such as head hunting and wanton waste has been going on for the past two years. If nothing is done now, there will be more illegal activity, which may get worse.

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

This proposal was submitted as an ACR by Melvin Paukan and later adopted by the Mid-Lower Yukon AC as their own proposal.

PROPOSED BY: Mid-Lower Yukon Fish & Game Advisory Committee (OI-F26-057)

Proposal 69

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

Allow the take of moose from a motor driven boat in GMU 18 as follows:

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

Allow the take of moose from a motor driven boat in GMU 18

5 AAC 92.080. Unlawful methods of taking game; exceptions.

The following methods of take are prohibited:

(4) unless otherwise provided in this chapter, from a motor-driven boat or a motorized land vehicle, unless the motor has been completely shut off and the progress from the motor's power has ceased, except that a

(A) motor-driven boat may be used as follows:

(i) in Units 23 and 26 to take caribou;

(ii) notwithstanding any other provision in this section, in Unit 22 to position hunters to select individual wolves for harvest;

(iii) under authority of a permit issued by the department;

(iv) IN UNIT 18 TO TAKE MOOSE (AND CARIBOU*)

*Caribou is being addressed through a separate proposal

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

The take of moose from a motor driven boat under power is a common and customary practice throughout Unit 18. The requirement to shut off a boat's motor before shooting is often impractical and unsafe. Currently, State and Federal regulations differ in allowing take of moose from a motor driven boat in Unit 18. This creates regulatory complexity for hunters and puts local people at risk of breaking the law, getting citations, and personal injury when carrying out traditional hunting practices.

Safety concerns are the primary reason for seeking this regulatory change. Water and weather conditions throughout the Yukon-Kuskokwim Delta (YKD) are highly variable and can change rapidly when out hunting. Fall storms are increasing in severity, and these storm surges create higher than normal water and faster currents, adding to the concerns. Having full control of the boat is of utmost importance for safety. If a driver has to shut off the motor, they can no longer effectively navigate obstacles that may pop up such as rocks, sweepers, or sandbars, nor can they keep the boat positioned appropriately in the current, which can often be strong.

As mentioned, hunting from a boat under power is a longstanding practice in Unit 18, similar to how residents of Units 23 and 26 harvest caribou in this manner and have been able to legally do so for decades. Customary and traditional methods and means, such as hunting from a motor driven boat, are characterized by efficiency and economy of effort. Starting and stopping a boat motor is not efficient, requires unnecessary effort, and can put hunters at a safety risk.

YKD residents grow up riding in and hunting from boats from a young age. To ensure safety when hunting from a boat, it is customary to select a designated shooter and for them to be positioned in the bow of the boat facing away from any other passengers and toward the shore. When an animal is spotted, the boat driver slows down and positions the boat for a safe and effective shot by the shooter. The requirement to shut off the boat's motor prevents this safe practice from occurring.

Adoption of this proposal would help make traditional hunting methods legal and reduce regulatory complexity. Hunting parties would still have the choice to shut off their boat motor if they deemed it to be safer in their given conditions. As this method of hunting is already practiced, there is no expected increase in hunting accidents. Rather, it would reduce the likelihood of accidents due to the safety concerns with shutting off boat motors as previously stated.

Statewide Federal regulations do not require a boat's motor to be shut-off to take an animal, but do require forward momentum from the boat's motor to have ceased unless otherwise allowed in Unit specific regulations. The take of moose from a boat moving under power has been legal in the lower Yukon portion of Unit 18 under Federal subsistence regulations since 2010, and throughout Unit 18 remainder since 2012.

The BOG considered a similar proposal in 2011 although it ultimately did not pass. In its comments, ADF&G stated, "in locations where traditional methods have been used for harvest, particularly the use of boats for the taking of caribou in Units 23 and 26(A), the method has been approved." The YKDRAC represents local users across Unit 18 with a vast array and depth of traditional knowledge, and in this context, implores the BOG to understand that hunting from a boat is a traditional method of harvest in Unit 18, similar to Units 23 and 26A

The YKDRAC is submitting two proposals to the Alaska Board of Game this cycle seeking to align State regulations with Federal ones and allow the take of caribou and moose from a boat moving under power and legalize this longstanding practice. Then, the YKDRAC plans to submit a proposal to the FSB during the next call for Federal wildlife regulatory cycle requesting to extend the take of moose from a motor driven boat throughout the entirety of Unit 18.

Legalizing this method of take will not lead to increased harvest of moose as this already a commonly practiced method of hunting that is already allowed under Federal regulations. There are no conservation concerns for moose and in some areas of Unit 18 moose numbers are so high that browse surveys indicate habitat is approaching carrying capacity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. The issue of take of moose and caribou from a boat moving under power was discussed at two separate YKDRAC public meetings. The discussion resulted in development of two BOG proposals to legalize this customary hunting practice under State regulations.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-115)

Proposal 70

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

Modify the Musk Ox hunts DX001 and DX003 resident and nonresident allocations as follows:

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

R- Musk ox- DX001- 4

NR- Musk Ox- DX###- 1

R- Musk Ox- DX003- 36

NR- Musk Ox- DX###- 4

R- RX070

R- RX071

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

I would like to see Musk Ox tags split between non residents and residents. DX001 had 60% go to non residents and DX003- had 35% go to non residents in 2026. This is unacceptable and the tags should be split out so this overrun does not happen.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-007)

Proposal 71

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

Modify Musk Ox hunts DX001 and DX003 to resident only hunts as follows:

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

B- Musk Ox changed to R only for Nunivak and Nelson Island.

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

I would like to see Musk Ox go to resident only. Nonresidents coming to Alaska have ample opportunity elsewhere to hunt Musk ox in Canada and Greenland. There is a short supply of draw tags for musk ox within the state, and the resident pool of applicants far exceeds availability. There is minimal revenue to the state based on nonresidents applying a successfully drawing the tag. Residents are still required to hire a transporter. This gives money to the villages and gives residents opportunities. Last year, DX001 had a 60% NR draw rate. DX003 had a 35% draw rate. This is unacceptable and goes against ANILCA.

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

I developed this on my own based on field observations and ADFG reporting.

PROPOSED BY: Brian Watkins

(OI-F26-008)

Proposal 72

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

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX001, to “up to” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX001, to “up to” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Muskox drawing hunt DX001.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Muskox hunting in Alaska is the only location in North America where a Non-Resident hunter could hunt Muskox without a guide, making it a highly desirable opportunity. Meat value of a Muskox is high and

obtaining Muskox permits even among local community members is difficult and both Residents and Non-Residents compete for the tags equally in the Big Game Drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-142)

Proposal 73

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

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX003, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 18 Muskox drawing hunt DX003, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Muskox drawing hunt DX003.

There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Muskox hunting in Alaska is the only location in North America where a Non-Resident hunter could hunt Muskox without a guide, making it a highly desirable opportunity. Meat value of a Muskox is high and obtaining Muskox permits even among local community members is difficult and both Residents and Non-Residents compete for the tags equally in the Big Game Drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-143)

Proposal 74

5 AAC 92.008. Harvest guideline levels.

Change the location of Nelson Island muskox registration permit availability to reflect the change from Newtok to Mertarvik as follows:

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

5 AAC 92.008. Harvest guideline levels.

- (4) Musk oxen on Nelson Island in Unit 18 shall be managed by registration permit hunts based on the harvestable portion of the population, as follows:
- (A) if 150 permits are available
 - (i) 65 of the available permits will be issued on a first-come, first-served basis in the 5 villages of Nightmute, Tununak, **Mertarvik** [NEWTOK], Chefnak and Toksook Bay on an annual rotating basis; remaining permits after issuance will be issued as follows;
 - (ii) 20 of the available permits will be issued in Bethel; and
 - (iii) 65 of the available permits will be issued online, with up to 5 issued to nonresidents;
 - (B) if more or less than 150 permits are available
 - (i) 44% of the available permits will be issued on a first-come, first-served basis in the 5 villages of Nightmute, Tununak, **Mertarvik** [NEWTOK], Chefnak and Toksook Bay on an annual rotating basis; remaining permits after issuance will be issued as follows;
 - (ii) 12% of the available permits will be issued in Bethel; and
 - (iii) 44% of the available permits will be issued online, with up to 8% allocated to nonresidents;
 - (iv) in order to achieve the desired number of permits, allocations will be adjusted proportionately until the allocation for Nightmute, Tununak, **Mertarvik** [NEWTOK], Chefnak and Toksook Bay reaches no less than 40 permits; the allocation for online and Bethel will then continue to be reduced proportionately.

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

The community of Newtok has relocated to a new location on Nelson Island, and the name of the new community is Mertarvik. Moving the community began in 2019, and there are no longer any residents in the old location of Newtok. The new location is approximately 9 miles from the original location. The regulation needs to be updated to reflect the move, and the board will need to determine if the existing pattern of issuance in regulation is still desirable given the new location of the community.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-038)

Proposal 75

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

Open a mainland musk oxen hunt in Unit 18 as follows:

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

Create a limited mainland musk oxen registration hunt in GMU 18 with harvest tags available in a community within the hunt area.

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

Open a mainland musk oxen hunt in Unit 18

There has been increase of musk oxen in Unit 18 with 450 counted, on the mainland and by opening a hunt more subsistence opportunity would be available to local people who could take advantage of the growing population. There has been testimony at the Regional Advisory Council meetings that people feel that it is

time. With the restrictions on salmon in the area and the low numbers of Mulchatna caribou, this hunt could be another food source for us.

For that reason, we would suggest a registration hunt with tags available in a community within the hunt area.

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

Proposal created and submitted by Central Bering Sea Fish & Game Advisory Committee

PROPOSED BY: Central Bering Sea Fish and Game Advisory Committee (HQ-F26-040)

Proposal 76

5 AAC 92.011. Taking of game by proxy.

Add muskoxen in Unit 18 to game that is allowed to be taken by proxy hunt as follows:

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

5 AAC 92.011(k). Taking of game by proxy. Include muskox on the list of species that can be taken under a proxy permit as follows: Add language to 5 AAC 92.011(k) Proxy hunting under this section is only allowed for

- (1) caribou;
- (2) deer;
- (3) moose in Tier II hunts, any-bull hunts, antlered-bull hunts without antler restrictions, and antlerless moose hunts; and
- (4) emperor geese;
- (5) muskoxen in Tier II hunts **and muskoxen in Unit 18**

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

This proposal seeks to allow proxy hunting in registration hunts of muskoxen hunts in Unit 18. Unit 18 was overlooked in getting proxy hunting in our area despite local Advisory Committees wanting to add our unit’s muskoxen hunt to the proposal submitted before to allow muskoxen in Tier II hunts but these suggestions were in comments. While unit 18 is allowed educational hunts on muskoxen, this doesn’t cover people who may have waited years to get the limited registration hunts and miss opportunities for harvest when a permit holder may become disabled or for whatever reason.

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

Central Bering Sea Advisory Committee

PROPOSED BY: Central Bering Sea Advisory Committee (HQ-F26-039)

Proposal 77

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Amend Bear baiting in Unit 18 to two seasons July 1 - Oct 31 /Apr 1 - Jun 30 as follows:

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

If a Fall Season is added to Unit 18 current regulations / season. This will enable the Hunter / Subsistence User to being able to take a Bear or Bears that are in season. Over the past 5 years, with the Current Regulations, some Hunters / Subsistence Users have been only able to hunt for about 2-3 weeks, due to Flooding of Bear Baiting sites and Bears not showing up till the last 2 weeks of the Bear Baiting Season.

Season Dates that are proposed for the new regulations are as follows.

Unit 18 July 1 - Oct 31 /Apr 1 - Jun 30

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

The Bethel Advisory Committee proposes to have a Spring and Fall Bear Baiting Seasons in the State of Alaska in Unit 18 where Bear Baiting is Legal. Hunters &

Subsistence users will have better opportunity to take bears if a Fall Bear Baiting Season is added to Unit 18's current Bear Baiting Season and Regulations. In certain Units throughout the State, Hunters & Subsistence Users may only have two (2) to three (3) weeks to legally take a Black or Brown when in season dates. Current Dates for Bear Baiting

Unit 18 Apr 1 – Jun30

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

The Bethel AC has developed this proposal for Unit 18 Hunters and Subsistence Users.

PROPOSED BY: Bethel Fish & Game Advisory Committee (OI-F26-066)

Proposal 78

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

Allow the use of cellular trail cameras for spring bearbaiting in unit 18 as follows:

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

The use of Cell trail cameras are legal to use during the spring bearbaiting season and only during the bear baiting season.

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

I would like to see cellular trail cameras, used for spring bearbaiting in unit 18.

This would allow for hunters to save money on gas and time in order to harvest black and brown bears that tend to kill our moose calves in the spring .

If nothing has changed then the status quo of using a trail camera will stay the same. Hunters will have to physically go and check their trail cameras to see if any bears have hit their bait.

By using a cellular trail camera, we might be able to get more hunters in the woods to control the population of bears so our moose population can continue to flourish on the Kuskokwim River.

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

PROPOSED BY: Rafe Johnson (OI-F26-037)

Proposal 79

5 AAC 85.056. Hunting seasons and bag limits for wolf.

Increase the wolf harvest limit in GMU 18 from 10 to 15 wolves as follows:

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

Increase the wolf harvest limit in GMU 18 from 10 to 15 wolves

5 AAC 85.056. Hunting seasons and bag limits for wolf

Unit 18

RESIDENTS/NONRESIDENTS:

Aug. 10 - Apr. 30

15 [10] wolves

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

Wolf numbers are high in Unit 18 and this proposal seeks to increase hunting opportunity for their harvest. There are no conservation concerns for wolves. The Department is conducting predator control of wolves to help the Mulchatna Caribou Herd recover. There are increased reports from area residents about wolves in and near communities that are causing safety concerns for people and pets.

The Federal Subsistence Board recently passed WP26-48, which increased the Federal hunting bag limit to 15 in Unit 18. This proposal seeks to align State and Federal hunting regulations for all hunters and reduce regulatory complexity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. Increasing the wolf harvest limit was discussed at two separate YKDRAC public meetings and there was support by attendees.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-112)

Proposal 80

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

Increase the coyote hunting bag limit in GMU 18 from 2 to 4 coyotes and extend the hunting season to Aug. 15 – May 31 as follows:

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

Increase the coyote hunting bag limit in GMU 18 from 2 to 4 coyotes and extend the hunting season to Aug. 15 – May 31:

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

(1) Coyote

Units 1-5, 18, and 22

AUG. 15 – MAY 31 [Sept. 1 - Apr. 30]

4 [2] coyotes

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

The number of coyotes in Unit 18 has been increasing over time. Coyotes are new to this area of the state. There are no conservation concerns and additional harvest opportunity can be supported.

Additionally, coyotes are being increasingly reported in and near communities, causing safety concerns for children and pets.

The Federal Subsistence Board recently adopted WP26-49, which increased the Federal hunting bag limit to 4 in Unit 18 and extended the hunting season to August 15-May 31. This proposal seeks to align State and Federal regulations for all hunters and reduce regulatory complexity.

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

The YKDRAC is comprised of 13 representatives from across the YKD region in Unit 18, many who also serve on their local Fish and Game Advisory Committees. This proposal was discussed at two separate YKDRAC public meetings, and there was support by attendees.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (OI-F26-113)

Proposal 81

5 AAC 84.27; 92.080. Furbearer trapping; Unlawful methods of taking game; exceptions.

Allow the use a motorized boat under power to position a hunter for a shot on a beaver in a river, lake, or pond in GMU 18 as follows:

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

A motorized boat under power can be used to position a hunter for a shot on a beaver in a river,lake or pond.

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

I would like to see a change in how beavers can be harvested by firearms or Archery equipment in unit 18.

My proposal would allow for positioning of a boat to shoot a beaver using motorized power.

This is NOT to chase or harass beavers while swimming in the water

The beaver population in unit 18 has been growing for the last 30 years. There are no signs of it being decimated by trappers, hunters or predators.

Taking of a beaver, using positioning by a motorized boat would allow for a cleaner kill and cut back on the loss of beavers, sinking in the river or lakes.

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

PROPOSED BY: Rafe Johnson

(OI-F26-038)
