

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

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)

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	
	(Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		
(20)		
...		
Unit 22(E)		
RESIDENT HUNTERS:		
1 bull <u>by registration permit only</u> ; or	Aug. 1 – Dec. 31	
1 antlered bull <u>by registration permit only</u>	Jan. 1 – Mar. 15	
NONRESIDENT HUNTERS:		Sept. 1 – Sept. 14
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		
...		

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 person'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 Advisroy 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	<u>Aug. 1 – June 30</u>
by drawing permit only;	[AUG. 1 – JUNE 15]
up to 40 permits may be issued	
in combination with	
Unit 22(C)	
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)

Aug. 1 – June 30
[Aug. 1 – Oct. 31]
[APR. 1 – JUNE 30]

Remainder of Unit 22

...

NONRESIDENT HUNTERS:

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

Aug. 1 – June 30
[AUG. 1 – JUNE 15]

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 they 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)
