

Interior and Eastern Arctic Meeting

Proposal Index

Regionwide and Multiple and Multiple Units.....	9
Proposal 82: Allow the use of cellular cameras for the taking of black bear and brown bear over bait in GMUs 12, 19, 20, 21, 24, 25, 26B, and 26C during applicable seasons for non-commercial users	9
Proposal 83: In all of unit 20 cellular cameras maybe used during bear baiting seasons. Cameras must be within a 100 yds of bait:	10
Proposal 84: Establish an open hunting and trapping season for cougars in the Northern Region, Units 12, 19-21, 24, 25, 26B and 26C	11
Proposal 85: Reauthorize the resident brown bear tag fee exemptions for the Interior and Northeast Alaska (Region 3)	12
Proposal 86: Add a new section to 5 AAC 92 regarding consideration of environmental change in game management decisions	13
Proposal 87: Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd	14
Proposal 88: Allow Crossbow Use in Archery-Only Hunts and Areas for Qualifying Purple Heart Veterans with Physical Challenges and Alaskan Seniors Age 62 or over	16
McGrath Area - Units 19, 21A and 21E	18
Proposal 89: Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt.....	18
Proposal 90: Repeal the 40 HP restriction in Holitna–Hoholitna Controlled Use Area	19
Proposal 91: Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area	21
Proposal 92: Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area	22
Proposal 93: Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area	23
Proposal 94: Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP	24
Proposal 95: Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP	25
Proposal 96: Amend the permit conditions for RM682 to allow permit holders to also hold and use other valid moose permits in the Kuskokwim drainage	26
Proposal 97: Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage	27
Proposal 98: Reauthorize the Unit 19D East Intensive Management predation control program.....	28
Proposal 99: Update Upper Kuskokwim Controlled Use Area (UKCUA) transportation of moose hunters, their gear, and parts of moose dates from Sept 1-25 to Sep 1-30 to align with current hunting season	33
Proposal 100: Make the RM650 permit available online	34

Proposal 101: Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only	35
Proposal 102: Reauthorize a fall antlerless hunt during September and a winter any-moose season during February in a portion of Unit 19D	36
Proposal 103: Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system	39
Proposal 104: Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system.....	40
Proposal 105: Re-open Unit 19C to resident general sheep hunting opportunity, but keep nonresidents on a draw permit system with limited allocation until a GCP is implemented	41
Proposal 106: Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute	44
Proposal 107: Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.....	44
Proposal 108: Return GMU 19C Dall Sheep season to historic season dates	48
Proposal 109: Amend management from full curl or larger to 3/4 curl or less for Rams in hunt DS196	50
Proposal 110: Amend regulations for sheep hunting in Unit 19C to sheep may be taken by residents and nonresidents by bow and arrow only	52
Proposal 111: Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits	53
Proposal 112: Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to “Up To” 10% of the available permits	54
Proposal 113: Restrict nonresident hunting for Bison in GMU 19.....	55
Proposal 114: Make changes to allocations in hunts RM653, DM681, and DM682 based on 2 year average bull to cow ratios	55
Proposal 115: Amend hunts RM653, DM681, and DM682 to Unlimited Registration for Alaskan Residents and limited to 10 Draw Permits for Non-Residents	56
Proposal 116: Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents	57
Proposal 117: Transition to a fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C.....	61
Proposal 118: Change bag limit in RM653 to One bull every two regulatory years with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side	65
Proposal 119: Reduce Season to Sept 1 – Sept 15 for Moose Permit RM653	66
Proposal 120: Amend Moose hunt under Permit RM653 to a Quota Hunt	66
Proposal 121: Change salvage rules for antlers with a spread of 55" or more	67
Proposal 122: Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653	68
Proposal 123: Shift the season dates for all moose hunters in Unit 21A from September 5-25th to September 1-20 ..	69

Proposal 124: Reauthorize a winter any-moose season during part of February and March in Unit 21E	70
Proposal 125: Extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit to Feb 15th – March 31st	71
Proposal 126: Amend Bear baiting in Unit 19 to two seasons July 1 - Oct 31 /Apr 1 - Jun 30	72
Proposal 127: Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations	73
Proposal 128: Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit.....	73
Tok Area - Units 12 & 20E	75
Proposal 129: Establish a Tier II hunt for the Fortymile caribou herd	75
Proposal 130: Make changes to non resident hunt allotment for 40 mile Caribou herd based on harvestable quota ..	80
Proposal 131: In the RC 860 hunt eliminate nonresident hunting opportunity, except nonresident military, in Zones 1, 3, and 4 and shorten the nonresident season in Zone 2	81
Proposal 132: 40 mile caribou herd Restrict Non-resident hunting in Zone 2 RC 860 Non-resident (except Non-resident Military)	85
Proposal 133: 40 mile caribou hunt be restricted to residents only and made into a tier two hunt	86
Proposal 134: Establish a resident only draw hunt for the fall RC 860 hunt whenever the herd population estimates are at or below roughly 28,000	86
Proposal 135: Adjust the season opener of the fortymile RC860 hunt to Aug 5th.....	87
Proposal 136: Amend the YC831 draw hunt to add Fortymile caribou hunt zones 2 and 4 to the hunt area and extend the closure date to September 30	88
Proposal 137: Limit the Non-Resident permit allocation for the Unit 20 Caribou drawing hunt YC831, to “Up To” 10% of the available permits	89
Proposal 138: Amend the seasons dates of AC999 targeted to October 1- March 31	89
Proposal 139: Redefine the boundaries of Zones 1 and 4 to isolate the core remote section of the current Zone 4	90
Proposal 140: Prohibit proxy hunting in Units 20B, 20D, 20E, 20F, and 25C for caribou under the Fortymile registration hunts	92
Proposal 141: Close the August 24-28 seasons for Moose hunting in unit 20E	93
Proposal 142: Determine customary and traditional use of Dall sheep in Unit 12 and Unit 20, for that portion outside of the Tok Management Area and the Delta Management Area.....	94
Proposal 143: Implement an intensive management predator control plan within the Tok Management Area to benefit Dall Sheep	94
Proposal 144: Limit the Non-Resident permit allocation for the Unit 20 Sheep drawing hunt DS206, to “Up To” 20% of the available permits	95
Proposal 145: For Dall Sheep hunting in the Glacier Mountain Controlled Use Area remove non resident opportunity and reduce resident opportunity	96
Proposal 146: Remove the requirement for hunters to possess a black bear harvest ticket prior to hunting black bears in Units 12 and 20E, and require all black bears taken in Units 12 and 20E to be sealed	97

Proposal 147: Lengthen muskrat trapping season 5 days to start on Sept 15th	99
Delta Junction Area - Units 20D	100
Proposal 148: Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM790, to “Up To” 10% of the available permits	100
Proposal 149: Limit the Non-Resident permit allocation for the Unit 20 Bison drawing hunt DI403/404, to “Up To” 10% of the available permits	100
Proposal 150: Establish IM area in 20D for Moose recovery	101
Proposal 151: Reauthorize the antlerless moose hunting seasons in Unit 20D	103
Proposal 152: Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20D	107
Galena Area - Units 21B, 21C, 21D, & 24	108
Proposal 153: Add a hunt condition for RM834, DM816, DM817, and DM818 so that hunters who receive this permit are not allowed to use aircraft for hunting moose in this hunt area	108
Proposal 154: Split the season for DM816, DM817, DM818 so that half the draw permit hunters hunt from 9/05- 9/15 and the other half hunt from 9/16-9/25	108
Proposal 155: Establish a Controlled Use Area in the Kaiyuh Flats area in Unit 21D that encompasses the RM831 hunt area	109
Proposal 156: Reauthorize a winter any-moose season during March in a portion of Unit 21D	111
Proposal 157: Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM816, to “Up To” 10% of the available permits	112
Proposal 158: Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM817, to “Up To” 10% of the available permits	113
Proposal 159: Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM818, to “Up To” 10% of the available permits	114
Proposal 160: Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM820, to “Up To” 10% of the available permits	114
Proposal 161: Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM892, to “Up To” 10% of the available permits	115
Proposal 162: Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM922, to “Up To” 10% of the available permits	116
Proposal 163: Limit the Non-Resident permit allocation for the Unit 24/25 Moose drawing hunt DM920, to “Up To” 10% of the available permits	116
Proposal 164: Change allocation in moose hunts DM809, DM810and DM811 in 21B to 80% for residents and 20% for non-residents	117
Proposal 165: Establish a winter registration moose hunt within a portion of the Hammond River drainage of Unit 24A	119
Proposal 166: Reduce Caribou bag limit for Western Arctic Caribou herd in 24B and 24C remainder	120
Proposal 167: Limit nonresident sheep hunters in Units 26B and 24A via a draw permit system	123

Proposal 168: Amend the spring bear baiting season in Units 21B, 21C, 21D, 24B, 24C, 24D, and 25D to open April 1 and close June 30, no change to the fall season (August 1–October 31).....	124
Proposal 169: Extend hunting and trapping for Wolverine to April 30	125
Northeast Alaska - Units 25A, 25B, 25D, 26B & 26C	126
Proposal 170: Decrease the caribou hunting bag limit for residents in Unit 24A remainder from 10 caribou to 5 bulls, and in Unit 26B remainder from 5 caribou to 5 bulls	126
Proposal 171: Create a registration hunt for cow caribou in units 24A and 26B for residents, to allow a limited harvest of cows to be taken when available, with season dates and bag limit to be announced	127
Proposal 172: Reduce the resident bag limit for caribou in 26B remainder.....	129
Proposal 173: Reduce the bag limit for Caribou in 24B remainder	130
Proposal 174: Change the bag limit for caribou to 5 bulls within the Dalton Highway corridor management area of GMU 25A	132
Proposal 175: Central Arctic Caribou Herd Reduce nonresident bag limit to one bull with a season Aug 1 – Sept 15. Eliminate the opportunity for residents to take cows.....	134
Proposal 176: Shorten the nonresident caribou season in GMU 26B to Aug 1-30th	136
Proposal 177: Modify the nonresident caribou hunting in GMU 26B to a draw tag system	137
Proposal 178: Modify the nonresident caribou hunting in GMU 26B to a draw tag system with three separate hunts	138
Proposal 179: Require nonresident caribou hunters that are not accompanied by a guide or a resident second degree of kindred to participate in a limited draw permit system.....	139
Proposal 180: Require archery hunters along the Dalton Highway in Unit 26B to be a minimum distance from the edge of the road; 5 miles for rifle hunters and 100 yards for archers during August and September	145
Proposal 181: Create a quarter mile set back in GMU 26B along the Dalton Highway right of way Boundary during the non-resident archery hunting season.....	146
Proposal 182: Establish a Central Arctic Management Area (CAMA) within Game Management Unit 26B.....	147
Proposal 183: Change the resident spring moose season from “to be announced” to April 1–April 14 in Unit 26B excluding the Canning River drainage	156
Proposal 184: Require antler destruction upon taking of moose in tier II area	157
Proposal 185: Require antler destruction upon taking of moose in 25D remainder	158
Proposal 186: Eliminate the drawing permit for nonresident hunters in Unit 26B for brown bears	158
Fairbanks Area - Units 20A, 20B, 20C, 20F, & 25C.....	160
Proposal 187: Increase youth hunting opportunities by allocating a portion (5%) of the any bull draw hunts and antlerless draw hunts in 20A	160
Proposal 188: Nonresident permit allocation for draw permit hunt DM766 limited to “up to ten percent”	160
Proposal 189: Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM766, to “Up To” 10% of the available permits	161
Proposal 190: Reauthorize the antlerless moose seasons in Unit 20A.....	162

Proposal 191: Change the registration period and permit issuance in antlerless moose registration hunt RM768 to October 1-15, and change the season dates to October 15 – last day of February	164
Proposal 192: Maintain current antlerless hunt closures (2026) in 20A remainder.....	165
Proposal 193: Shorten the season dates for motorized restrictions in the Wood River CUA	166
Proposal 194: Allow the take of waterfowl with the use of shotgun within the Healy Lignite Management Area	168
Proposal 195: Increase youth hunting opportunities by allocating a portion (10%) of the antlerless draw hunts in 20B FMA.....	168
Proposal 196: Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM786, to “Up To” 10% of the available permits	169
Proposal 197: Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM788, to “Up To” 10% of the available permits	169
Proposal 198: Change the dates of the non-resident hunt within the Minto Flats Management area to September 8-25 in 20B and September 5-15 in 20B remainder	170
Proposal 199: Close a portion of western Unit 20B to nonresident moose hunters	171
Proposal 200: Reauthorize the antlerless moose seasons in Unit 20B	172
Proposal 201: Create a new muzzleloader hunt in a portion of unit 20C	176
Proposal 202: Improve youth hunting opportunities by changing the youth hunt in 20C RM781, 25 Aug- 31 Aug, to a draw hunt with new dates.....	177
Proposal 203: Require Bone-In Transport of Moose Meat in the Lake Minchumina Area of Unit 20C	178
Proposal 204: Create a limited draw Moose hunt for nonresidents in the Lake Minchumina area of GMU 20C	179
Proposal 205: Change the dates of the non-resident moose hunt in 20C to September 1 - 25	180
Proposal 206: Change bag limit and special instructions for RM 781 to one bull with spike fork antlers, 50 inch antlers, or 4 or more brow tines on at least one side	180
Proposal 207: The Lake Minchumina area of GMU 20C shall have hunting access limited to surface use watercraft transport.....	181
Proposal 208: Remove the winter moose hunting season from regulations in GMU 20F	182
Proposal 209: Re-evaluate the ANS for 20F and 20C and create a separate ANS for each subunit to be able to more accurately evaluate whether ANS is being met in 20F	183
Proposal 210: Change the winter moose hunting season in GMU 20F to a Tier II hunt.....	183
Proposal 211: Change hunting season for moose in 25C to start one week later than it currently does, for the same number of days that are allowed now.....	184
Proposal 212: Change the bag limit in RM 781 and RM 749 registration moose hunts to: One bull with 50” antlers or antlers with 3 or more brow tines on at least one side.....	185
Proposal 213: Open a resident-only spring brown bear season extension in Unit 20A and 20B Remainder.....	187
Proposal 214: Limit nonresident sheep hunting opportunity in Unit 20A.....	188
Proposal 215: State owned lands in the Stampede Road corridor should be closed to hunting and trapping of wolves, coyotes, wolverine, and lynx	190

Proposal 216: Change the boundaries of the closed area to allow beaver trapping with submerged sets above the River Road bridge on the Chena River	193
Proposal 217: Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20B Remainder	193
Proposal 218: Change season and bag limits for Furbearer Trapping in 20A and B	194
Proposal 219: Reestablish the Beaver Sealing Requirement in GMU's 20 A, B, C, D	196
Antlerless Moose & Brown Bear Tag Fee Reauthorizations for Other Regions	198
Proposal 220: Reauthorize the antlerless moose season in Unit 6(C)	198
Proposal 221: Reauthorize the antlerless moose season in Unit 17A	199
Proposal 222: Reauthorize the antlerless moose draw permits in Units 14A and 14B	201
Proposal 223: Reauthorize the antlerless moose seasons in Unit 14(C)	203
Proposal 224: Reauthorize the antlerless moose season on Kalgin Island in Unit 15B	205
Proposal 225: Reauthorize the antlerless moose seasons in Unit 15C	207
Proposal 226: Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C) :.....	209
Proposal 227: Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region	211
Proposed Changes Outside the Board of Game's Authority	213

ALASKA BOARD OF GAME
Interior and Eastern Arctic Region Meeting
Pike's Waterfront Lodge, Fairbanks, Alaska
March 19-26, 2027

TENTATIVE AGENDA

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

Friday, March 19, 8:30 a.m.

OPENING BUSINESS

Call to Order / Purpose of Meeting

Introductions of Board Members and Staff

Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

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

Saturday, March 20, 8:30 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

Sunday, March 21, 9:00 a.m.

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued/concluded

BOARD DELIBERATIONS upon conclusion of public testimony

Monday, March 22 thru Thursday, March 25, 8:30 a.m.

BOARD DELIBERATIONS continued

Friday, March 26, 8:30 a.m.

BOARD DELIBERATIONS continued/conclude

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

ADJOURN

Agenda Notes

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

Regionwide and Multiple and Multiple Units

Proposal 82

5 AAC 92.08. Unlawful methods of taking game; exceptions.

Allow the use of cellular cameras for the taking of black bear and brown bear over bait in GMUs 12, 19, 20, 21, 24, 25, 26B, and 26C during applicable seasons for non-commercial users as follows:

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

5 AAC 92.080 - [Effective until 7/1/2025] Unlawful methods of taking game; exceptions

7 (H) any camera or other sensory device that can send messages through wireless communication; **except that cameras that can send messages through wireless communication may be used by non-commercial bear baiters in GMUs 12, 19, 20, 21, 24, 26B and 26C at legal bear bait stations during the applicable black and/or grizzly bear seasons**

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

Allow the use of cellular cameras for the taking black bear and brown bear over bait in its GMUs 12, 19, 20, 21, 24, 25, 26B, and 26C during applicable seasons for non - commercial users. This allows an easily enforceable regulation for law enforcement with concise purpose of use and time when these cameras can be used.

Currently hunters are not allowed to use any camera or other sensory device that can send messages through wireless communication. This includes cellular game cameras over bear bait. These were prohibited with the assumption that this would give an unfair advantage to hunters, yet despite when the hunter gets a photo, he would still have to travel to hunt his bait station often requiring hours of travel that is not feasible in a reasonable amount of time, or the day of the picture was taken. In the name of safety, a hunter with young children could have the knowledge that a bear was on the bait and approach with extreme caution. In these units, hunters are allowed to hunt bears same day airborne provided they are 300 feet from a plane.

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

Yes, this proposal was developed by the Delta Fish & Game Advisory Committee.

PROPOSED BY: Delta Fish & Game Advisory Committee

(OI-F26-153)

Proposal 83

5 AAC 92.08. Unlawful methods of taking game; exceptions.

In all of unit 20 cellular cameras maybe used during bear baiting seasons. Cameras must be within a 100 yds of bait as follows:

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

In all of unit 20 cellular cameras maybe used during bear baiting seasons. Cameras must be within a 100 yds of bait.

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

The current prohibition in 5 AAC 92.080(7)(H) bans any “camera or other sensory device that can send messages through wireless communication.” This prevents the use of stationary cellular trail cameras at registered bear bait stations in Unit 20. Bear baiting is already a legal, selective management tool (not traditional “fair chase”), yet hunters are forced to make repeated, often unnecessary physical checks of bait sites. This results in hundreds of dollars in wasted fuel.

If nothing changes, baiters will continue burning unnecessary fuel (Interior Alaska gasoline currently averages \$3.34/gallon in Fairbanks and up to \$6+ in rural areas) on multiple weekly trips per station. Youth and less-mobile hunters will be discouraged because real-time viewing from home is impossible. Cellular cameras can allow hunters to notify AWT of possible poaching or site tampering without having to encounter the perpetrator. Cellular cameras change none of the biological outcomes: bag limits remain three black bears per year (no closed season) and one brown/grizzly bear per year (with subunit-specific seasons and permits), bait stations stay registered, and bears continue to come and go as they please.

Facts supporting adoption:

- Alaska’s statewide black bear population is stable at approximately 100,000 animals. In GMU 20D (a representative subunit), the population is healthy and stable with an estimated 750 adult bears; average annual harvest is only 37 bears (66% male, just 25% taken over bait), well within sustainable objectives (≤ 15 south and ≤ 35 north of the Tanana River). Similar low, sustainable harvest occurs across Unit 20.
- In the vast majority of U.S. states where cellular cameras are fully legal, there is no evidence of increased overharvest or population declines—harvest remains controlled by bag limits and seasons, exactly as it would in Unit 20.
- Cameras provide real safety and efficiency benefits without any downside: they notify hunters only when activity occurs, reducing total trips, habitat disturbance, and the ability to prosecute hunter harassment or poaching.

Other solutions (more frequent physical checks or non-cellular cameras) were rejected because they do not deliver real-time data, cost savings, or safety improvements. Cellular cameras cannot

kill animals or exceed bag limits—they simply let hunters (and their kids at home) watch in real time.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-161)

Proposal 84

5 AAC 85.XXX. Seasons and bag limits for cougars/mountain lion

Establish an open hunting and trapping season for cougars in the Northern Region, Units 12, 19-21, 24, 25, 26B and 26C as follows:

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

Establish an open season for cougars in the Northern Region, Units 12, 19-21, 24, 25, 26B and 26C. Hunting season: No closed season

Trapping season: November 1 to April 30

You may not trap cougars with a steal trap or snare smaller than 3/32 inch in diameter during April Limit: No limit

Salvage Requirements: Skull and hide.

Sealing Requirements: Skull and hide will be presented for sealing within 10 days of kill.

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

Alaska's struggling ungulate population do not need new and potentially growing source of predation. Establishing seasons so that cougars can be legally taken would allow people to harvest cougars and provide valuable data to the ADF&G on the presence and distribution of cougars in the interior region.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-166)

Proposal 85

5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the resident brown bear tag fee exemptions for the Interior and Northeast Alaska (Region 3) as follows:

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

5AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the resident brown bear tag fee exemptions for the Interior and Northeast Alaska (Region 3) as follows:

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

(4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

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

The Board of Game must annually reauthorize all resident brown bear tag fee exemptions. The Board of Game put resident brown bear tag fees in place statewide during the mid-1970s to discourage incidental harvest, elevate the status of brown bears to trophies, and to provide revenue. Today, populations in the aforementioned units are abundant, and brown bears continue to be highly regarded as trophies. Across the region, season dates and bag limits effectively regulate harvest in areas where interest is high.

Eliminating all resident brown bear tag fees throughout Region 3 simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these brown bear populations. This reauthorization would assist with the department objective of managing Region 3 brown bear populations for hunter opportunity and would continue to allow hunters to take brown bears opportunistically. Reauthorizing these tag fee exemptions would allow residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, to legally harvest brown bears. During regulatory years 2014–2024, approximately 20% of brown bears harvested by resident hunters in Region 3 were taken incidentally to other activities, compared to 8% statewide.

Human-caused mortality of brown bears in most areas of Region 3 is quite low and is assumed to be less than 6% of the population, which is a rate that is sustainable under most ecological circumstances. Where harvests are elevated (i.e., Units 20A, 20B, 20D, and portions of 26B), brown bear populations are managed through changes in seasons and bag limits. The presence or absence of tag fees does not appear to have a significant influence on harvest in these areas.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-020)

Proposal 86

5 AAC 92.XXX. New Regulation.

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

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

Add a new section as follows

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PROPOSED BY: Paul Forward

(OI-F26-127)

**Amendments may be required to remain consistent with statutory authority.*

Proposal 87

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

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

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

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

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

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

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

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

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

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

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

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

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

** Amendments may be required to remain consistent with statutory authority.*

Proposal 88

5 AAC 92.104. Authorization for methods and means disability exemptions.

Allow Crossbow Use in Archery-Only Hunts and Areas for Qualifying Purple Heart Veterans with Physical Challenges and Alaskan Seniors Age 62 or over as follows:

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

Amend **5 AAC 92.104 (Authorization for methods and means disability exemptions)** by adding a new subsection for automatic authorization, and make conforming changes to 5 AAC 92.085 and 5 AAC 92.530 as needed.

Proposed new language (to insert as subsection (f) or similar):

“(f) Notwithstanding other provisions of this chapter, the department shall issue a methods and means exemption authorizing the use of a crossbow in any hunt or area restricted to bow and arrow only—including the Dalton Highway Corridor Management Area under 5 AAC 92.530(7)—to an applicant who:

- (1) is an Alaska resident Purple Heart recipient and provides documentation of physical challenges (e.g., wheelchair confinement, prosthetics, or a VA-certified service-connected
- (2) disability that prevents effective use of a conventional bow); or is an Alaska resident 62 years of age or older;

and who possesses a valid ADF&G-approved crossbow education certification card. The exemption shall be issued upon one-time submission of proof of eligibility (Purple Heart/VA documentation for veterans; proof of age and residency for seniors) and shall remain valid for the life of the hunter (or five years, renewable). No physician statement is required for those meeting the above criteria. The crossbow must meet all requirements in 5 AAC 92.085(15). The department may include reasonable conditions for safety and fair chase.”

This applies **statewide**, explicitly including the DHCMA north of the Yukon River along the Trans-Alaska Pipeline corridor.

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

Current regulations prohibit crossbows in any hunt or area restricted to “bow and arrow only” (5 AAC 92.085). This includes premium archery-only hunts statewide and specific management areas such as:

- **The Dalton Highway Corridor Management Area (DHCMA)** (5 AAC 92.530(7)): Portions of Units 20 and 24–26 extending five miles from each side of the Dalton Highway (Trans-Alaska Pipeline corridor), from the Yukon River north to the Arctic Ocean. In this corridor, big game may be taken by bow and arrow only (firearms are prohibited for big game hunting within the corridor).

While disabled hunters can seek individual **Methods and Means Disability Exemptions** (5 AAC 92.104), the process is burdensome for recurring use. Purple Heart veterans confined to wheelchairs, using prosthetics, or with other service-related physical challenges often cannot effectively draw or hold a conventional bow. Alaskan seniors age 62+ face similar age-related limitations but are not automatically eligible.

These restrictions limit access for deserving Alaskans in archery-only opportunities statewide **and specifically exclude them from the DHCMA north of the Yukon River**—a unique, remote area along the pipeline corridor that offers important hunting access via the Dalton Highway. Opening this corridor (and all archery areas) to qualifying crossbow users honors veterans’ service, supports senior participation, promotes hunter retention, and maintains fair chase and conservation goals without affecting bag limits, seasons, or wildlife populations.

Why is this proposal necessary? (Rationale and benefits)

- **Equity and access:** Provides meaningful opportunity for Purple Heart veterans and seniors in archery-only hunts **and the DHCMA**, where conventional bow use may be physically impossible.
- **Targeted and limited impact:** Only a small number of qualifying hunters; crossbows must still meet strict standards (100 lb draw, etc.) and certification requirements. No change to seasons, bag limits, or overall harvest.
- **Administrative efficiency:** One-time approval vs. repeated per-hunt exemptions.
- **Precedent and fairness:** Builds on existing disabled veteran free licenses and senior programs. The DHCMA was established for access and wildlife protection—allowing crossbows for these groups aligns with that intent while removing unnecessary barriers.
- **Other solutions considered:** None. The current exemption process is too cumbersome for statewide and corridor use by clearly defined groups.

Supporting information (attach if desired):

- Your Purple Heart documentation or personal story.
- Letters from veterans’ groups, senior organizations, or local Advisory Committees.
- Current ADF&G crossbow and exemption forms.

This updated proposal ensures Purple Heart veterans with physical challenges and seniors 62+ can hunt ethically with crossbows in archery-only areas **throughout Alaska, including the important Dalton Highway/Trans-Alaska Pipeline corridor north of the Yukon River.**

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

PROPOSED BY: Daniel McDowell, The Last Frontiersman

(OI-F26-027)

McGrath Area - Units 19, 21A and 21E

Proposal 89

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

Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt as follows:

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

Amend regulations to remove Unit 19A moose from Tier II subsistence management and establish a registration hunt managed by the Alaska Department of Fish and Game.

Proposed regulatory language:

5 AAC 85.045. Hunting seasons and bag limits for moose. Unit 19A:

REGISTRATION HUNT: One bull moose; season dates, permit numbers, and any antler restrictions to be established by the department through permit conditions based on current population status and harvest objectives.

[UNIT 19A MOOSE HUNT MANAGED UNDER TIER II SUBSISTENCE HUNTING]

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

Moose populations in Game Management Unit 19A have increased to a level where additional harvest opportunity may be provided while continuing to meet conservation and subsistence needs. Recent post-hunting season composition surveys indicate adequate calf-to-cow ratios and continued population growth, suggesting the herd can support increased harvest. These indicators suggest that harvest levels could exceed the Amount Necessary for Subsistence (ANS) without compromising sustained yield.

Unit 19A has met or exceeded the lower bounds of the ANS for multiple consecutive years. When populations are consistently meeting or exceeding ANS thresholds, it indicates that the resource is sufficient to provide for subsistence needs without the need for Tier II allocation. Continued use of Tier II under these conditions is inconsistent with its intended purpose, which is to restrict access only when harvestable surplus is insufficient to meet demand.

During the March 2024 Board of Game meeting, the board reduced the size of Unit 19A while simultaneously increasing the ANS for the unit. During this same period, village populations in the region have declined. This creates a situation where the current ANS may no longer accurately reflect present subsistence demand on the resource.

In addition, the current Tier II structure may no longer be necessary to allocate opportunity. In practice, the number of applicants closely aligns with the number of permits issued, resulting in most or all applicants receiving permits. This calls into question the need for a Tier II system, which is intended to limit participation when demand exceeds available harvest.

If no change is made, Unit 19A will remain under a Tier II framework that may no longer reflect current biological conditions or actual subsistence demand, and may continue to unnecessarily limit participation.

This proposal seeks to align management with current population status and user demand by transitioning the Unit 19A moose hunt from Tier II subsistence to a registration hunt, while maintaining the department's ability to regulate harvest, adjust permit numbers annually, and ensure long-term sustainability.

Population and composition data supporting this proposal are summarized in Alaska Department of Fish and Game moose survey updates, including post-hunting season surveys conducted in 2024 and 2025

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

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-084)

Proposal 90

5 AAC 92.540. Controlled Use Areas.

Repeal the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Current Regulation (5 AAC 92.540(3)(B)): (3) Holitna-Hoholitna Controlled Use Area (i) the area consists of those portions of Units 19(A) and 19(B) draining into the Kuskokwim River downstream from and including the Moose Creek drainage on the north bank from and including the Stony River drainage and downstream from and including the Swift River drainage on the south bank; (ii) the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of 40 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1; however, this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.

Proposed Regulation Change: Repeal the 40 HP restriction in subparagraph (ii) so it reads: (ii) ~~the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of 40 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game from August 1 through November 1; however, this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.~~ [No horsepower restriction on boat motors.]

What would be the effect if this proposal is adopted? Hunters from GMU 18 and surrounding areas would have better access to GMU 19 hunting grounds using safer, more efficient boats. This could slightly increase hunting pressure, but existing seasons, bag limits, and reporting requirements would mitigate any conservation concerns. No significant negative impact on moose, caribou, or other big game populations is expected, as the restriction was originally intended to reduce disturbance but are no longer necessary with current management tools.

Who is likely to benefit? Local residents, subsistence users, and recreational hunters in GMUs 18 and 19 who rely on river travel for access. It would promote fairness and safety.

Who is likely to suffer? Possibly non-local hunters or those preferring low-disturbance areas, but overall impacts should be minimal.

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

The 40 horsepower (HP) boat motor restriction in the Holitna-Hoholitna Controlled Use Area (CUA) within GMU 19 limits access for hunters traveling from GMU 18 via connected waterways like the Holitna and Kuskokwim rivers. This restriction, which applies to hunting big game (including transportation of hunters, gear, or parts) from August 1 to November 1, prevents the use of boats with motors over 40 HP, even when necessary for safe navigation in strong currents, shallow waters, or long-distance travel. Residents and hunters in GMU 18 rely on these rivers for access to hunting areas in GMU 19, but the HP limit increases travel time, fuel consumption, and safety risks (e.g., getting stuck or unable to handle river conditions). Removing this restriction would improve equitable access without negatively impacting wildlife populations, as modern boats are more efficient and the area already has other protections like bag limits and seasons. This change would support subsistence and recreational hunting while maintaining conservation goals.

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

Yes, Bethel Advisory Committee

PROPOSED BY: Bethel Advisory Committee

(OI-F26-054)

Proposal 91

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

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

The current regulation in the Holitna–Hoholitna Controlled Use Area limits outboard motors to 40 horsepower during the fall hunting season. While originally intended to reduce access pressure, this restriction creates practical and safety concerns for those traveling the river system.

The Holitna and Hoholitna rivers can present challenging conditions, including shallow sections, variable channels, and long travel distances. Operating with smaller motors can reduce a hunter's ability to navigate safely, especially when transporting gear or harvested game. This can lead to increased risk and reduced reliability in remote areas.

In addition, modern boat designs and common usage have shifted toward higher horsepower motors, and the current restriction does not reflect how most boats are now configured for safe operation

If the restriction remains in place, hunters will continue to face limitations that may impact safe travel and efficient retrieval of game. As equipment standards continue to evolve, the regulation may become increasingly impractical and misaligned with real-world conditions.

Removing the horsepower restriction would allow individuals to operate equipment that is better suited for current river conditions and modern boat setups. This would improve safety, reliability, and overall efficiency without eliminating other existing controls in the area.

Maintaining the aircraft restriction and other elements of the controlled use area continues to limit certain types of access, while removing the horsepower cap addresses a specific concern that no longer serves its intended purpose.

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

Family

PROPOSED BY: Kenneth Owens

(OI-F26-073)

Proposal 92

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

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

The Holitna–Hoholitna Controlled Use Area currently restricts the use of outboard motors greater than 40 horsepower for big game hunting. While intended to limit access and reduce hunting pressure, this restriction creates safety concerns and practical limitations for hunters navigating the Holitna and Hoholitna river systems.

River conditions in this area can include shallow water, strong currents, debris, and long travel distances. Limiting hunters to smaller motors can reduce maneuverability and reliability, particularly when boats are heavily loaded with gear or game meat. This may increase risk during travel and limit the ability to respond to changing river conditions.

Additionally, advances in boat and motor technology have made higher horsepower motors more common and, in many cases, necessary for safe and efficient operation. The current restriction does not reflect these changes and may place hunters using standard modern equipment at a disadvantage.

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

Family

PROPOSED BY: Edward Enoch

(OI-F26-074)

Proposal 93

5 AAC 92.540. Controlled Use Areas.

Remove the 40 HP restriction in Holitna–Hoholitna Controlled Use Area as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than ~~40 horsepower~~ to take big game.

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

The 40 horsepower motor restriction in the Holitna–Hoholitna Controlled Use Area places unnecessary limits on how people can safely travel the river system during hunting season.

The rivers in this area are long, remote, and can change quickly depending on water levels and conditions. Using a smaller motor can make travel slower and less dependable, especially when hauling gear or returning with meat. In some situations, this can create safety concerns or make it difficult to complete a trip efficiently.

Many boats in use today are designed to run with higher horsepower motors, and limiting them to 40 horsepower does not match how most people are equipped. This can make it harder for hunters to use the equipment they already have safely and effectively.

If the current restriction remains, people will continue to deal with limitations that can affect safe travel and the ability to move efficiently on the river. This may discourage use of the area or create ongoing safety concerns for those who rely on it.

Removing the horsepower limit would allow people to use appropriate equipment for the conditions without changing other existing restrictions in the area. It would improve safety and practicality while still maintaining the intent of managing access through other means already in place.

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

Friends and family

PROPOSED BY: John Wuya

(OI-F26-075)

Proposal 94

5 AAC 92.540. Controlled Use Areas.

Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP as follows:

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

Recommended solution: Increase the horsepower limit from 40 hp to 115 hp to allow safe operation with both prop and jet drives commonly used by Unit 18 hunters.

Regulatory language Draft:

5 AAC 92.540. Controlled use areas.

...

(B) the Holitna-Hoholitna Controlled Use Area:

(i) the area consists of the waters of the Holitna River downstream from Kashegelo, the Titnuk River (Creek) downstream from Fuller Mountain and the Hoholitna River downstream from the confluence of the South Fork and main Hoholitna River;

(ii) the area is closed to the use of any boat equipped with an inboard or outboard motor with an aggregate horsepower in excess of the manufacturer's rating of [40] 115 horsepower for hunting big game, including the transportation of big game hunters, their hunting gear, or parts of big game, from August 1 through November 1; however this provision does not apply to the transportation into the area of game meat that has been processed for human consumption.

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

The Holitna-Hoholitna Controlled Use Area in Unit 19 currently limits boat motors to 40 horsepower. This restriction creates serious safety and access problems for residents of Unit 18 who must travel long distances on the Kuskokwim River system to reach traditional hunting areas in the Holitna and Hoholitna drainages.

Hunters from Unit 18 regularly use larger motors for safe travel due to strong currents, unpredictable weather, heavy loads of gear and meat, and long round-trip distances. When switching from a propeller to a jet unit — a common practice in shallow or changing river conditions — horsepower is significantly reduced. A 40 hp limit does not provide enough power once converted to a jet, forcing underpowered boats and creating safety risks.

ADF&G already effectively manages harvest in the area through check stations in the Upper Holitna-Hoholitna Management Area, bag limits, seasons, and other tools. If nothing is changed, Unit 18 residents will continue to be practically excluded from these historically used hunting grounds, reducing equitable opportunity and food security for rural families.

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

I developed this proposal based on my direct experience as a Unit 18 hunter and discussions with other residents who travel the Kuskokwim and Holitna rivers. Many of us run propeller drives for the main river travel and then switch to jet units when river conditions change. The current 40 hp limit does not account for this common and necessary practice. I have not yet coordinated with my local Advisory Committee but plan to do so.

PROPOSED BY: Nicholas Ayapan

(OI-F26-121)

Proposal 95

5 AAC 92.540. Controlled Use Areas.

Amend the 40 HP restriction in Holitna–Hoholitna Controlled Use Area to 115 HP as follows:

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

Amend 5 AAC 92.540 (Controlled Use Areas) for the Holitna–Hoholitna Controlled Use Area as follows:

In the Holitna–Hoholitna Controlled Use Area, this area is closed to the use of aircraft for the purpose of taking big game, and during August 1 through November 1, a person may not use a motorized boat with an outboard motor greater than 115 horsepower to take big game.

If the current restriction remains in place, users will continue to operate with limited effective power when using jet units, which are common in this type of river system. This may result in continued challenges related to safe navigation, load carrying, and travel efficiency.

Increasing the limit to **115 horsepower** accounts for the reduction in usable power when motors are equipped with jet units. This provides a more practical level of performance while still maintaining a defined upper limit on motor size.

This change would improve the ability of users to safely and effectively travel in the area without removing all restrictions on motorized access. It reflects current equipment standards and typical use patterns while maintaining a controlled approach to managing access.

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

The current 40 horsepower restriction in the Holitna–Hoholitna Controlled Use Area does not reflect how boats are commonly used on these rivers today, particularly with the widespread use of jet outboards.

Jet units significantly reduce the effective horsepower delivered to the water compared to prop-driven motors. As a result, a motor rated at 40 horsepower provides substantially less usable power when configured as a jet, which can limit maneuverability and performance in shallow, braided, and fast-moving river conditions.

Travel in the Holitna and Hoholitna systems often involves long distances, variable water levels, and heavy loads. Underpowered boats can struggle in these conditions, especially when transporting gear or harvested game. The current limit can therefore create operational challenges and reduce the margin of safety for users.

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

No

PROPOSED BY: Samuel Hancock

(OI-F26-060)

Proposal 96

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

Amend the permit conditions for RM682 to allow permit holders to also hold and use other valid moose permits in the Kuskokwim drainage as follows:

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

This change would primarily affect the special conditions for hunt RM682 under 5 AAC 85.045 (hunting seasons and bag limits for moose) and/or 5 AAC 92 (permit hunt procedures). The current restriction appears in hunt-specific details and permit issuance rules.

Current (as described in hunt info and permit conditions): If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year. [Or similar language prohibiting holding RM682 with other Kuskokwim drainage moose permits.]

Proposed Regulation Change: Amend the permit conditions for RM682 to remove the exclusion: ~~If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.~~ **Hunters who receive an RM682 permit may also hold and use other valid moose permits in the Kuskokwim drainage, subject to all other applicable regulations.**

(If a specific codification exists in 5 AAC 85.045(a)(19) or permit regs, reference it; otherwise, this targets the hunt condition directly.)

What would be the effect if this proposal is adopted? Hunters could participate in RM682 and other moose hunts in the Kuskokwim drainage (e.g., combining with permits in adjacent subunits), increasing flexibility for subsistence users and locals without significantly increasing overall harvest pressure, as reporting remains mandatory and populations are monitored.

Who is likely to benefit? Resident hunters, especially subsistence users in the Kuskokwim region and those accessing from areas like GMU 18, who face access challenges and want multiple opportunities.

Who is likely to suffer? Minimal impact: possibly slight increase in effort in some areas, but conservation tools (seasons, quotas if any, reporting) would prevent overharvest.

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

The registration moose permit RM682 in Unit 19E includes a restriction that prohibits a hunter from holding or using this permit if they hold any other moose hunting permit in the Kuskokwim drainage for the regulatory year. This excludes hunters from participating in multiple compatible moose hunts (e.g., registration or Tier II permits in adjacent or overlapping areas like other parts of the Kuskokwim drainage). For residents in or accessing via areas like GMU 18 or along the Kuskokwim River, this limits opportunities for subsistence or recreational hunting, reduces flexibility, and may create unnecessary barriers without clear conservation benefits. Removing this exclusion would allow hunters to hold RM682 alongside other valid moose permits in the drainage, promoting equitable access while existing harvest reporting, seasons, and bag limits continue to manage populations sustainably

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

Bethel Advisory Committee

PROPOSED BY: Bethel Advisory Committee

(OI-F26-055)

Proposal 97

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

Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage as follows:

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

Remove the restriction that prohibits holders of the RM682 registration moose permit from also holding other moose permits in the Kuskokwim River drainage. This modest change gives hunters needed flexibility while keeping all hunt-specific seasons, bag limits, and reporting requirements in place.

Regulatory language draft:

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

...

For the RM682 registration moose hunt in Unit 19E remainder:

Current language: If you receive a RM682 permit you [CANNOT] receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.

Proposed language: If you receive a RM682 permit you MAY receive and hunt under another permit to hunt moose in the Kuskokwim drainage this regulatory year. This includes permits such as RM615 and others.

Hunters who receive an RM682 permit may also hold and use other valid moose permits in the Kuskokwim drainage, subject to all other applicable regulations. All hunt-specific seasons, bag limits (one antlered bull), and reporting requirements remain in effect.

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

The RM682 registration moose permit for Unit 19E remainder currently states: “If you receive a RM682 permit you CANNOT receive another permit to hunt moose in the Kuskokwim drainage this regulatory year.” This restriction forces residents of Unit 18 and other Kuskokwim communities to choose between the short early-season RM682 hunt and other important moose hunting opportunities, such as registration hunts in Unit 18 (e.g., RM615).

This “one-tag-only” rule is overly restrictive for rural hunters who rely on multiple flexible opportunities for food security. RM682 is a limited, short-duration registration hunt with low harvest pressure. ADF&G already controls overall moose harvest through permit quotas, season length, bag limits, and reporting requirements. If nothing changes, hunters who obtain RM682 will continue to lose access to other compatible Kuskokwim moose hunts, reducing opportunity without clear conservation benefits.

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

This proposal is based on my personal experience hunting moose on the Kuskokwim River areas as a Unit 18 resident. Along with other rural Kuskokwim residents. The current restriction creates unnecessary hardship when trying to plan hunts across multiple registration opportunities.

PROPOSED BY: Nicholas Ayapan (OI-F26-122)

Proposal 98

5 AAC 92.123. Intensive Management Plans VII.

Reauthorize the Unit 19D East Intensive Management predation control program as follows:

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

5 AAC 92.123(c). Unit 19(D)-East Predation Control Area.

(c) Unit 19(D)-East Predation Control Area: the Unit 19(D)-East Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage, but excluding the Black River drainage, encompassing approximately 8,513 square miles; this predation control program does not apply to any National Park Service or National Wildlife Refuge lands unless approved by the federal

agencies; notwithstanding any other provisions in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf and a black bear and a brown bear population reduction or a wolf and a black bear and a brown bear population regulation program in Unit 19(D)-East to benefit moose:

(1) the following Wolf and Bear Control Focus Areas are established in the Unit 19(D)-East Predation Control Area; the areas do not delineate a moose, wolf, or bear population and are not intended to distinguish animals within the focus areas from populations in Unit 19(D)-East; the purpose is to focus wolf and bear control in a relatively small area where moose numbers can be better estimated, where moose are accessible to hunters, and where harvest can be closely monitored;

(A) the Wolf Control Focus Area (WCFA) encompasses approximately 5,579 square miles within that portion of Unit 19(D) upstream of the Selatna River drainage, but excluding the Black River drainage, and downstream of, but not including Fourth of July Creek, the Swift Fork, or the Slow Fork and Tonzona River drainages east of 153° 10.00' W. long.; wolf control will be conducted only within the WCFA; the department will have the discretion to adjust the WCFA's size and shape to include up to approximately 6,000 square miles of Unit 19(D)-East;

(B) the Black Bear and Brown Bear Predation Control Focus Area (BCFA) encompasses approximately 528 square miles consisting of those portions of the Kuskokwim River drainage enclosed by a line starting at a point northwest of McGrath at 63° 04.00' N. lat., 155° 50.00' W. long., then east to 63° 04.00' N. lat., 154° 50.00' W. long., then south to 62° 54.00' N. lat., 154° 50.00' W. long., then west to 62° 54.00' N. lat., 155° 25.00' W. long., then south to 62° 50.00' N. lat., 155° 25.00' W. long., then west to 62° 50.00' N. lat., 155° 30.00' W. long., then south to 62° 48.00' N. lat., 155° 30.00' W. long., then west to 62° 48.00' N. lat., 155° 35.00' W. long., then south to 62° 42.00' N. lat., 155° 35.00' W. long., then west to 62° 42.00' N. lat., 155° 55.00' W. long., then north to 62° 50.00' N. lat., 155° 55.00' W. long., then east to 62° 50.00' N. lat., 155° 50.00' W. long., then north to the point of beginning at 63° 04.00' N. lat., 155° 50.00' W. long., surrounding the village of McGrath; bear control will be conducted only within the BCFA; the department will have the discretion to adjust the BCFA's size and shape up to approximately 680 square miles of Unit 19(D)-East; the BCFA is within the WCFA;

(2) this is a continuing control program that was first authorized by the board in 1995; wolf control began in winter 2003 - 2004 and bear control began with nonlethal removal of bears in the BCFA during May 2003 and May 2004; the control program is currently designed to increase moose numbers and harvest in the WCFA and BCFA by reducing predation on moose and is expected to make a contribution to achieving the intensive management (IM) objectives in Unit 19(D)-East;

(3) moose, wolf, black bear, and brown bear objectives are as follows:

(A) moose IM objectives established by the board for Unit 19(D)-East are for a population of 6,000 - 8,000 moose and an annual harvest of 400 - 600 moose;

(B) the **population** [DENSITY] objective for moose in the WCFA is **5,600 moose** [1.0 MOOSE PER SQUARE MILE] (corrected for sightability) in fall **or late winter** surveys; **the population objective for moose in the BCFA is 1,050 moose (corrected for sightability) in fall or late winter surveys;** the annual harvest objective for the WCFA is **140** [225] moose;

(C) the wolf control objective in the WCFA is to reduce wolf numbers **to the lowest level possible** [BY AT LEAST 60 - 80 PERCENT]; the pre-control wolf population in Unit 19(D)-East was estimated in February 2001 at 198 wolves; the 2001 pre-control estimate within the WCFA **was** [IS] 130 wolves; only removing wolves from the WCFA will ensure that wolves persist in Unit 19(D)-East.

(D) the black bear control objective in the BCFA is to reduce black bear numbers to the lowest level possible; the pre-control black bear population in Unit 19(D)-East was estimated at 1,700 black bears; the pre-control black bear population estimate within the BCFA was approximately 130 black bears; because the BCFA is a relatively small geographic area, removing black bears from within the BCFA will have only a minor effect on the black bear population in Unit 19(D)-East;

(E) the brown bear control objective in the BCFA is to reduce brown bear numbers to the lowest level possible; the pre-control brown bear population in Unit 19(D)-East was estimated at 128 brown bears; the pre-control brown bear population estimate within the BCFA was nine; because the BCFA is a relatively small geographic area, removing brown bears from within the BCFA will have only a minor effect on the brown bear population in Unit 19(D)-East;

(4) board findings concerning populations and human use are as follows:

(A) the Unit 19(D)-East moose **population and harvest objectives have** [HARVEST OBJECTIVE HAS] not been achieved;

(B) the [WCFA OBJECTIVE FOR MOOSE HARVEST HAS NOT BEEN ACHIEVED;] **moose population in the WCFA and BCFA are currently below objective and harvest in the WCFA is currently below objective;**

(C) predation by wolves and bears is an important cause of the failure to achieve **population and** harvest objectives;

(D) a reduction of wolf and bear predation within the WCFA and BCFA can reasonably be expected to make progress towards achieving the Unit 19(D)-East intensive management objectives;

(E) reducing predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(F) reducing predation is likely to be effective given land ownership patterns;

(G) Unit 19D-East is recognized under the state's intensive management law as an area where moose are to be managed for high levels of harvest for human consumptive use; reducing predation is in the best interest of subsistence users; the area has long been an important hunting area for subsistence by local area residents as well as other Alaska residents;

(5) if the moose population in the WCFA and BCFA, and harvest objectives in the WCFA are not met and two-year average twinning rates are above 20 percent, authorized methods and means are as follows:

(A) hunting and trapping of wolves and hunting of black bears and brown bears by the public in Unit 19(D)-East during the term of this program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles;

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

(C) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits using fixed-wing aircraft as a method of wolf removal under AS 16.05.783;

(6) time frame is as follows:

(A) before July 1, **2033** [2030], the commissioner may authorize removal of wolves and black bears and brown bears in Unit 19(D)-East;

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

(7) the commissioner will review, modify, or suspend program activities when:

(A) the moose **population in the WCFA or BCFA, or harvest objectives in the WCFA are achieved;** [DENSITY AND HARVEST OBJECTIVES SPECIFIED IN THIS SUBSECTION ARE ACHIEVED WITHIN THE WCFA;]

(B) any measure consistent with signs of nutritional stress in the moose population are identified.

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

The 19D-East Predation Control Plan was initially authorized in 1995. However, the predation control program did not begin until December 2003. The Board of Game (board) authorized the

current plan in March 2020, reauthorized it in March 2024, and it expires June 30, 2030. The current plan has not been updated since 2020 and this proposal seeks to evaluate the current objectives, including program-specific harvest objectives, population objectives, and predator removal objectives. If approved by the board, this plan will remain in place from July 1, 2027 through June 30, 2033.

Both department and public periods of bear removal, a 23-year wolf removal program and a large wildfire have occurred since the program was implemented confounding the department's ability to assess the program's efficacy. Moose abundance increased from 2003 through 2022. However, following an exceptionally deep snow winter (2022/2023) the moose population declined to 2012 levels.

The current program objectives include achieving a moose abundance of 1.0 moose/mi² and a harvest objective of 225 moose, both measured at the scale of the Wolf Control Focus Area (WCFA). While moose harvest from the WCFA is assessed annually, geospatial population estimate (GSPE) surveys for moose are conducted in a 1,118 mi² area surrounding the Bear Control Focus Area (BCFA). The department conducted these surveys as part of an ongoing research program, but they precluded more frequent surveys of the WCFA, which has not been surveyed since 2017. Within the WCFA, moose densities approximately doubled from 2001 (0.5 moose/mi²) to 2017 (1.1 moose/mi²), briefly exceeding the IM density objective of 1.0 moose/mi². While the WCFA has not been surveyed since 2017, a 2023 GSPE survey in the 1,118 mi² survey area surrounding the BCFA showed a decline of approximately 36% to 1.4 moose/mi², after reaching a high of 2.1 moose/mi² in 2017. If the WCFA moose density declined at a similar rate, the moose population there would now be below the density objective for the WCFA. The harvest objective of 225 moose has not been met to date. However, with the limited access in Unit 19D East, it is unlikely a harvest of 225 moose can be achieved.

Wolf removal objectives in this program have been tied to a pre-control abundance estimate of 198 wolves (23 wolves/1000mi²) in 2001 in Unit 19D East. Using this density, the department estimated there were 130 wolves, pre-control, in the current WCFA (5,579 mi²). Only public aerial wolf removals have been conducted and most wolves are removed in February-March, with highly variable removal rates. The population has been able to sustain removals of 14-73 wolves and maintain an average fall population of 54 wolves. In the last decade, fall wolf abundance estimates have been among the highest recorded by the department during the program, similar to those recorded in the mid-1990s, but likely low compared to the current prey base. Total wolf removals in the last decade have also been among the highest recorded in the program, suggesting the sustainability of the wolf removal levels.

Moving forward, the WCFA will be the primary focus for abundance estimates for moose, with a secondary objective based on the BCFA. The department is reducing the moose harvest objectives within the WCFA to more closely reflect demonstrated historical levels of harvest, and to reflect what is achievable in areas that are accessible to hunters (i.e. river corridors and the limited road systems).

This proposal retains the option of both public- and department-conducted wolf removals, and department-conducted bear removals. The department will issue public aerial permits as long as the moose population is below the stated population and harvest objectives, and the department has no indications of nutritional stress in moose. Removing bears only from the BCFA, and wolves only from the WCFA will ensure predator populations persist in Unit 19D East.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-026)

Proposal 99

5 AAC 92.540. Controlled Use Areas.

Update Upper Kuskokwim Controlled Use Area (UKCUA) transportation of moose hunters, their gear, and parts of moose dates from Sept 1-25 to Sep 1-30 to align with current hunting season as follows:

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

(7) Unit 19:

(A) the Upper Kuskokwim Controlled Use Area:

(i) the area consists of that portion of Unit 19(D) extending two miles on either side of, and including the Kuskokwim River, upstream from the mouth of the Black River to the mouth of the Swift Fork, extending two miles on either side of, and including, the Takotna River, upstream from the mouth of the Takotna River to Takotna, and extending two miles on either side of, and including, the South Fork River, upstream from the mouth of the South Fork to Nikolai;

(ii) the area is closed to the use of aircraft for hunting moose, including the transportation of moose hunters, their hunting gear, or parts of moose during open moose hunting seasons [FROM SEPTEMBER 1 THROUGH SEPTEMBER 25]; however, this provision does not apply to the transportation of moose hunters, their hunting gear, or parts of moose by aircraft between publicly owned airports including McGrath, Medfra, Nikolai, and Takotna, or the transportation into the area of game meat that has been processed for human consumption;

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

The Upper Kuskokwim Controlled Use Area (UKCUA) prohibits the transportation of moose hunters, their gear, and parts of moose from Sept 1-25. Prior to RY17 this prohibition was in place all year long, but publicly owned airports were excluded. In March 2017 the board passed proposal 81 which specifically named the publicly owned airports within the UKCUA (McGrath, Medfra, Nikolai, and Takotna) and also limited the UKCUA prohibitions to September 1-25. In March 2024, the board passed proposal 66 which lengthened the moose hunting season to September 30th. However, no changes were made to the UKCUA prohibition dates and the moose hunting season dates and the UKCUA dates are now out of alignment. This housekeeping proposal would realign the dates.

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

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-175)

Proposal 100

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

Make the RM650 permit available online as follows:

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

By having the RM650 permit available online, the hunters from Lower Kuskokwim River will have the ability to attain the permit with-in the current dates that are posted in the hunting regulations for this hunt. This will also save the Hunters / Subsistence users money to purchase fuel for their up-coming hunt instead of having to make two trips up to McGrath to attain the RM650 Permit. The Board of Game can Limit the number of permits to be issued online.

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

Make the RM650 Registration Permit available online.

With having the RM650 Registration permit only available in person in set area McGrath, Nikolai and Takotna, it is harder for people that are from the lower Kuskokwim River to get the RM650 Permit. By having the hunter show up in person and the possibility of the hunter having to come back up river less than 30 days later, that will put an impact on being able to purchase fuel for their future hunt. Price of fuel and hunting related items has gone up over the past few years. Just recently the Board of Game has made the RM682 Permit available online with only a certain amount to obtained online.

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

The Bethel AC is in favor of having the RM650 Permit Available online to help out future hunters / subsistence users on the Kuskokwim River

PROPOSED BY: Bethel Advisory Committee (OI-F26-069)

Proposal 101

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

Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only as follows:

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

Extend the moose season in Game Management Unit 19D Remainder for certified bowhunters only by traditional longbow or recurve bow only.

Unit 19D, remainder (between and including the Cheeneetnuk and Kogrukluk River drainages, excluding within 2 miles of the Swift River):

Residents and nonresidents: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side; HT; Sept. 1–Sept. 20.

Residents and nonresidents: One bull with 50-inch antlers or antlers with four or more brow tines on at least one side; by bow and arrow only; certified bowhunters using traditional longbows and recurve bows only; HT; Sept. 21–Sept. 25.

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

Moose hunting opportunity in Unit 19D is limited by the current season length. extending the season by five days under a highly selective method of take would provide additional time afield while maintaining negligible impact on overall harvest.

Extending opportunity in this manner would also help distribute hunter effort over a longer period, reducing crowding and competition during the existing general season. Spreading out hunter participation can improve overall hunt quality and reduce user conflicts without increasing pressure on the resource.

Warmer early-season conditions in recent years have increasingly created challenges for meat care and spoilage prevention. Providing a later opportunity under a highly selective method of take would allow harvest to occur under more favorable conditions, supporting proper meat care and reducing waste.

Restricting this extension to traditional longbows and recurve bows ensures that any additional harvest remains minimal. The effective range and difficulty associated with traditional equipment inherently limit success rates, resulting in low overall harvest even with increased opportunity.

This approach is not new. Multiple states (Oregon, Utah, Oklahoma, etc) have implemented traditional archery opportunities to increase time afield while maintaining low harvest levels. These seasons have proven effective at expanding opportunity without negatively affecting game populations.

There is also a substantial segment of the hunting community that actively seeks out more challenging methods of take. Traditional archery participation is not limited to a small niche;

many hunters are willing to accept lower success rates in exchange for a more challenging and deliberate hunting experience. Providing this opportunity aligns with that demand while maintaining conservative harvest levels.

If no change is made, opportunity remains limited despite the availability of a management tool that can increase participation without increasing harvest pressure.

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

Members and Board of Directors of Compton Traditional Bowhunters

PROPOSED BY: Compton Traditional Bowhunters

(OI-F26-124)

Proposal 102

5 AAC 85.045(a)(17)(B). Hunting seasons and bag limits for moose.

Reauthorize a fall antlerless hunt during September and a winter any-moose season during February in a portion of Unit 19D as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(17)		
...		
Unit 19(D), that portion of the Black River drainage within 2 miles of the Kuskokwim River and that portion of the Selatna River drainage north of the Selatna River within 2 miles of the Kuskokwim River		
...		
1 antlerless moose by drawing permit only; up to 20 cows may be taken	Sept. 1 – Sept. 30 (General hunt only)	No open season

Unit 19(D), that portion 2 miles on either side of the Kuskokwim River from the Selatna River upstream to the confluence of the South Fork and the North Fork of the Kuskokwim River, and 2 miles on either side of the South Fork of the Kuskokwim River from the mouth to Nikolai, and 2 miles on either side of the Takotna River from the mouth to the bridge at Takotna, excluding the Black River drainage and the Selatna River drainage

...

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
1 antlerless moose by drawing permit only; up to 20 cows may be taken; or	Sept. 1 – Sept. 30 (General hunt only)	No open season
1 moose by registration permit only; a person may not take a cow accompanied by a calf	Feb. 1 – Last day of Feb.	No open season

Unit 19(D), that portion of the Black River drainage excluding that portion within 2 miles of the Kuskokwim River, and that portion of the Selatna River drainage north of the Selatna River, and excluding that portion with 2 miles of the Kuskokwim River

...

Sept. 1 – Sept. 30 (General hunt only)	No open season
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1 antlerless moose by drawing permit only; up to 20 cows may be taken

Unit 19(D) Remainder

...

Sept. 1 – Sept. 30
(General hunt only)

No open season

1 antlerless moose by drawing permit only; up to 20 cows may be taken; or

Feb. 1 – Last day of Feb.

No open season

1 moose by registration permit only;
a person may not take a cow accompanied by a calf

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game (board).

The moose population in Unit 19D upstream of the Selatna River recently experienced a significant decline due to the extremely difficult winter of 2022–2023. During a November 2023 geospatial population estimate (GSPE), the department documented a decline from 2,471 moose (2.2 moose/mi²) to 1,591 moose (1.4 moose/mi²). Due to this decline, the department closed the winter hunt in regulatory year (RY) 23 by emergency order. In March 2024, the board adopted Proposal 66, which was submitted by the McGrath Advisory Committee (AC) prior to the documented decline, and authorized a new drawing permit hunt in the fall for cows in a portion of Unit 19D. Both hunts were reauthorized by the board in March 2026 with unanimous support from the McGrath AC. To allow the moose population to recover from the 2022–2023 winter decline, the department did not implement any antlerless hunts during RY24 and RY25. While the department does not intend to issue antlerless permits in RY27, the department would like to keep the hunt available as a tool to provide additional opportunity when it is again warranted.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-013)

Proposal 103

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system as follows:

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

Change the current 19C Dall Sheep hunting regulations as follows:

-Residents: One ram with full-curl horn or larger, RSXXX, [NO OPEN SEASON], Aug 10-Sept 20

Registration permit for residents, capped at (15) rams taken by full-curl horn or larger, broomed or broken on both sides or 8 years old or larger.

-Non-Residents: One ram with full-curl horn or larger, DSXXX, [NO OPEN SEASON], Aug 10-Sept 20

Drawing permit for non-residents and 2DK, capped at (5) total draw permits with up to (1) draw permit allocated to 2DK

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

The Matanuska Valley Advisory Committee would like to see a change to the current regulations for Dall Sheep in unit 19C to allow for a registration permit hunt for residents. Due to no biological concerns with full-curl management implementation, coupled with a conservatively capped registration permit, opportunity to hunt 19C would be granted to all resident sheep hunters. The Matanuska Valley Advisory Committee has always supported resident hunting opportunity, and this would allow for a hunting opportunity to resume after the recent closure to both residents and non-residents. We would ask for a (7) day reporting period for the registration permit, giving time for hunters to leave the field and promptly report whether successful or unsuccessful.

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

PROPOSED BY: Matanuska Valley Fish & Game Advisory Committee (OI-F26-149)

Proposal 104

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, keep nonresidents on a draw permit system as follows:

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

A general sheep season for residents in Unit 19C should again be allowed. There is a harvestable surplus of rams in Unit 19C for a general season resident sheep hunt according to the Department, which poses no sheep conservation concerns at this time. Nonresident sheep hunting should be draw-permit only with a limited allocation.

Unit 19C Sheep

Residents: One ram with full-curl horn or larger by Harvest Ticket Aug 10 – Sept 20

Nonresidents: One ram with full-curl horn or larger every four regulatory years by draw permit Aug 10 – Sept 20 (up-to 10 permits) until a Guide Concession Program is implemented

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

LOSS OF RESIDENT SHEEP HUNTING OPPORTUNITY IN UNIT 19C

At the March, 2025, Statewide Board of Game Meeting, when the board was deliberating Proposal 190 that would shut down resident sheep hunting opportunity in Unit 19C for the 2025 fall season and in 2026 put resident and nonresident sheep hunters on a draw permit system, the Alaska Department of Fish and Game (Department) told the board that there was a harvestable surplus of sheep in Unit 19C for residents under a general season hunt, and that they had no conservation concerns over continued resident general sheep hunting opportunity in the unit, even though the sheep population was in decline..

The board had already closed Unit 19C in 2023 to all nonresident sheep hunting opportunity due to conservation concerns that arose after the board allowed unlimited nonresident sheep hunting opportunity that resulted in nonresident guided hunters taking 90 percent of the sheep harvest in 2022 from the declining sheep population.

At that time, and previously, the board stated that the problem was “too many guides” in the unit, not their allowance of unlimited sheep hunting opportunity for nonresidents who are required to hire a guide. Whether the problem was too many guides, or too many nonresident sheep hunters, the board’s conservation concerns related to what they believed was an overharvest of sheep in Unit 19C by nonresident guided hunters. Resident sheep hunters never posed a sheep conservation concern.

The board’s decision in 2025 to shut down the resident sheep season in 19C, and make it a draw hunt for both residents and nonresidents starting in 2026, had a caveat that general sheep hunting opportunity in 19C for residents and nonresidents would only be allowed in the future if there were limits on guides via a Guide Concession Program (GCP) the legislature authorized

during the 2025 session (SB 73) which could be implemented as a test program in a unit of the board's choosing

Why are resident sheep hunters bearing the burden of this closure and subsequent draw hunts when the Department says there are no sheep conservation concerns with continued resident general sheep hunting opportunity, and the board has determined that the problem was too many guides? Why is resident general sheep hunting opportunity in the future dependent on limiting guides? What the board is really alluding is that if guides are not limited in 19C there will continue to be an overharvest of sheep from a declining sheep population by nonresident guided hunters.

The only sheep hunters in Unit 19C that need to be on a draw permit system before guides are limited are nonresidents.

Unit 19C Guide Concession Program & Timeline

The board passed a proposal in March of 2025 that would implement a GCP in Unit 19C, however, the Department of Law stated that the way the board adopted that proposal was not legal, and a new proposal must come forth in 2027 to designate Unit 19C as the first area where a test GCP will be implemented.

The Department of Natural Resources (DNR) has hired one additional employee for the GCP but the Department has not received the funds allocated by SB 73 to hire additional staff deemed necessary for their role in the GCP. Realistically, we are likely looking at a minimum of three years from the time the board passes a GCP proposal in 2027 before the program would be in place and implemented.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-162)

Proposal 105

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-open Unit 19C to resident general sheep hunting opportunity, but keep nonresidents on a draw permit system with limited allocation until a GCP is implemented as follows:

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

Re-open Unit 19C to resident general sheep hunting opportunity

Keep nonresidents on a draw permit system with limited allocation until a GCP is implemented

Unit 19C Sheep Residents

Aug 10 – Sept 20

One ram with full-curl horn or larger (OTC permit)

Unit 19C Sheep Nonresidents Aug 10 – Sept 20

One ram with full-curl horn or larger every four regulatory years by draw permit only Up to 4 permits

When/if a Guide Concession Program is implemented in Unit 19C, nonresident sheep hunters will go off draw permit and be able to hunt under an OTC permit.

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

Sheep Declines in Unit 19C, Resident Loss of Opportunity, Guide Concession Program

For several cycles, Resident Hunters of Alaska (RHAK) submitted proposals to limit nonresident sheep hunters in Unit 19C due to high nonresident harvest rates, a declining sheep population, and fears that residents would lose sheep hunting opportunity if the board did not limit nonresident sheep hunters.

Every one of our proposals was voted down, with the board using the rationale that under full-curl harvest management, there were no conservation concerns (even with low sheep numbers) with continued unlimited nonresident sheep hunting opportunity. The board admitted all along that there were problems, but they said the problems stemmed from unlimited guides in the unit, not the unlimited opportunity they gave to nonresident sheep hunters who must be guided.

This entire decade and more of us submitting proposals and them being voted down, only for the board to eventually say there were sheep conservation concerns in Unit 19C due to no limits on guides (i.e. unlimited nonresident opportunity) has been disheartening to say the least.

Resident sheep hunters are now on a draw system for Unit 19C sheep, with 16 permits being issued. Residents *did* end up losing sheep hunting opportunity, just like we feared due to inaction by the board to limit the nonresident component.

Residents will not gain general season OTC opportunity again until a Guide Concession Program (GCP) is implemented. The board has not even chosen an area yet for the initial experimental GCP that can only be implemented in one Unit. ADFG does not have the funding for their role in a GCP. The Department of Natural Resources (DNR) has hired one person for their role in the GCP but they have told us that the earliest they see a GCP being implemented is at least 3 years out from the time the board chooses an area.

This whole thing is flat-out ridiculous that the board would allow unlimited nonresident sheep hunting opportunity in an area they knew had drastic sheep declines and allow nonresidents to

harvest 90 percent of the sheep the last year it was open to everyone. Resident sheep hunters should not have to bear the burden of lost opportunity when all along they were not a part of the problem.

Tying resident opportunity to a program to limit guides is also just ridiculous. What do guides have to do with resident sheep hunting opportunity? Why does no limits on guides lead to a resident sheep hunting closure? It's the board's job to use their authority to fix problems, not delay for over a decade when they could have fixed the problem all along by limiting nonresident sheep hunters, which in turn limits the number of guides.

The reason we are here now with Unit 19C being a draw-only hunt for residents until a GCP is implemented in the unit is because the board had a preferred option that was best for the guide industry. They chose that option and delayed acting for over a decade, rather than doing what was best for the sheep and resident sheep hunters all along.

Residents should be allowed general season OTC sheep hunting opportunity in Unit 19C again. ***Resident sheep hunters should not have to wait until guides in the unit are limited to hunt again under a general season.***

The board's rationale on this matter makes no sense when you really think about it. "We can't let residents hunt sheep under a general season because there are too many guides." "Too many sheep will be taken if we don't limit guides."

What kind of state do we live in whereby guides and the guide industry can negatively affect resident sheep hunting opportunity? To say we are disappointed is a gross understatement. We are angry! This kind of thing should never be allowed to happen! No other state would allow it to happen except Alaska, where we cater to the guide industry in ways that make no sense. It is not the board's job to provide stability to the guide industry!

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-138)

Proposal 106

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute as follows:

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

Re-establish the previous 8/10-9/20 over the counter sheep tag with a full curl, 8 year old or double broken statute. With 95% of the state on full curl management regardless of population numbers why is 19C the exception?

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

Restore the previous BIOLOGICALLY proven management strategy of full curl, 8 year old or double broken to a harvest ticket status. I believe that the previous decision made in 2023 was emotionally driven and not science based. The ADF&G Biologist stated that they did not recommend a closure or a drawing hunt. There was no biological evidence that this was needed, sheep populations ebb & flow with nature and are just currently in a down cycle.

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

I have been very active in talking with local biologists & staying up to date of count survey data. The last two years have shown the sheep on the upward trend & if weather allows should continue to replenish the overall population. This should show no biological conflict to open the season back to over the counter harvest status.

PROPOSED BY: Anthony Marchini

(OI-F26-137)

Proposal 107

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters as follows:

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

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.

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

Reestablish Full Curl, 8 year, or both horns broken Harvest ticket season bag limits for sheep hunting in Unit 19C August 10-Sept 20 for Resident and Non-Resident hunters.

The BOG action banning nonresident Dall ram hunting in Unit 19C and subsequent drawing permit season should be rescinded.

Reopen seasons for resident and non-resident hunter for 1 full curl or 8 years of age or both horns broken. This is based on biology.

I quote Dr. Wayne Heimer, recognized as one of the premier Thin Horn Sheep biologists in North America in his previous proposal which clearly addressed the issues which have not changed:

Begin Dr. Heimer Quote:

"I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

BIOLOGY AND MANAGEMENT:

- 1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today's declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.*
- 2. This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.*
- 3. Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.*
- 4. The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.*

PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)

- 1. The apparent declines in Dall sheep populations have lead to the intuitive assumption that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.*
- 2. Sufficient concern over these intuitive assumptions was expressed to the Board of Game that it requested an informational meeting with Alaska's Dall sheep biologists and managers about the status of Dall sheep research and management last October. a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner's Office through the Department of Fish and Game. According to the established statutes, the Commissioner's Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.*

3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.

4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.

5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.

6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board-generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.

7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted. a. At this time, the total input from the “generating board” is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.

8. Subsequently, the board met in mid March to consider the board-generated proposal to close all Dall sheep in Unit 19C for five years.

9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass. a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim. i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK’s request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.

10. In an apparent effort to garner more board support (votes) for the (his or the Board’s?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting. a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.

11. The board approved the amendment, and moved to consider the amended proposal.

12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.

13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote margin. a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.

14. As things stand at present, nonresident participation in mature Dall ram harvesting is scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt are still allowed by regulation.”

PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,

“... the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner’s Office.

a. Alaska law (AS 16. ARTICLE 1. Sec. 16.05.010.

Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME) says “The commissioner is the principle executive officer of the Department of Fish and Game.” 2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the. . . game resources of the state in the interest of the economy and general well-being of the state.” a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner’s obligation and authority to manage in the best interests of Alaska’s economy. 1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.

2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”

a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.

b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.

3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says:

“ . . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”

a. If use isn't maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident-free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

Wayne Heimer (EG-F23-266)“ End Dr. Heimer Quote.

Hunting is a very emotionally charged and competitive topic. I am emotionally invested as anyone. However, emotion must not be allowed replace sound biological evidence. Biology does NOT support the closure or drawing permits for Dall Sheep in unit 19C.

Hunters have lost the use of a resource due to an unfounded BOG decision on an emotionally charged perception.

Mandatory education videos need to be required for licensing, like the Goat and Moose judging courses to aid in identifying legal and older animals. Helping to assure taking of old legal rams.

As a nearly lifelong Alaskan, I started hunting sheep 42 years ago in 19C. I have seen the ups and downs in population and the numbers of hunters in the field. The Alaska Range is my home. The last thing I want is to see our Dall sheep herd compromised. There is no data that supports a closure or draw in 19C. I believe we should manage our resources based on biology.

Rescind the closure and subsequent draw.

Sincerely,

Jeff Pralle

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

PROPOSED BY: Jeff Pralle

(OI-F26-172)

Proposal 108

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Return GMU 19C Dall Sheep season to historic season dates as follows:

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

GMU 19C Dall's Sheep Season. Aug 10 – Sept. 20, 2027. Residents and Non-Residents. One Full Curl Ram.

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

GMU 19C Dall's Sheep Season. Return it to historic season dates. All the time, expense, effort, and restrictions implemented since 2023 have not, and will not, put more sheep on the mountain.

Out of Cycle BOG Proposal 204 passed in March of 2023 after the same proposal had failed by a wide margin at the previous regularly scheduled Interior Cycle BOG meeting. There was a significant level of emotion which trumped proven science, leading to the passage of Proposal 204 at the out of cycle meeting held on the Kenai Peninsula. The Alaska Board of Game process represents the most democratic process of wildlife conservation in the world and Alaskans need to be able to believe in and trust the Board process to make scientific and constitutional based decisions.

The ensuing developments since have put proven science aside and pitted user groups against user groups in the drawn-out fight for who will and will not hunt Dall's sheep in GMU 19C.

As a conservationist, hunter, and professional guide, having spent nearly 3,000 days of the past 45 years of my life living with and documenting Dall's sheep populations in GMU 19C, I have seen nearly identical population swings over the years, due to hard winters and predator abundances. These cycles are normal and will continue to occur.

Full curl management of wild sheep naturally protects recruitment. Recruitment and genetics are both provided for by the sub-legal ram population.

Hunting within a full-curl management strategy does not affect recruitment.

As well, harvest and sealing records for 19C prior to 2023 clearly indicate that rams exceeding eight years of life were not being harvested annually.

Professional guides and resident hunters can easily determine harvest potential by paying attention to annual harvest reports, weather reports, sheep hunting media, and plan their outings accordingly.

Board of Game actions to manage predation at lower levels will do more than any other factor to help maintain sustained yield, abundance, and maximum benefit objectives. Then, when hard winters do occur, the populations are not already in low density equilibriums which require longer periods of time to naturally rebuild.

Most Alaskans love our wolves, but we do not love them in numbers that hold our precious prey species in low densities which does not allow for our given habitats to be utilized.

If the BOG follows the new pattern of wild sheep management it has started within GMU 19C, the burgeoning of the process will compound around the state and the negative fight for who does and who does not hunt will continue to degenerate hunting for future generations.

You can fix this now.

Recommendations:

1. Accelerate activation of already passed predator management initiatives within GMU 19C.
2. Reauthorize over the counter Dall's sheep hunting for residents and non-residents equally.
3. Develop and encourage maximum penalty for anyone harvesting sub-legal sheep.

What would happen if nothing is changed?

People's time, state expenses will continue to be lost. The negative fight for who will or will not hunt will continue. Mature rams will continue die of old age while professional guides try to explain to their clients in the field why. Resident and non-resident hunters will continue to lose hunting opportunity.

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

This proposal and reasoning for it has been supported by numerous previously provided written and oral BOG testimonies from many people and entities including but not limited to, well known and respected Alaska wild

sheep biologists, wildlife biologists/managers, ADF&G, wild sheep support groups and related individuals, professional guides and their support groups, outdoor associations, and hunters in general.

PROPOSED BY: Robert Fithian DBA Taiga Resources Conservation (OI-F26-212)

Proposal 109

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Amend managment from full curl or larger to 3/4 curl or less for Rams in hunt DS196 as follows:

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

Residents: One ram with full-curl horn or larger – HT – August 10 – September 20
[DS196]

One ram with $\frac{3}{4}$ curl horn or less, excluding rams with both tips broken, by permit available online at hunt.alaska.gov or in person in McGrath and Nikolai beginning Sept. 29. Check in/out required due to small quota; aircraft prohibited; contact McGrath at (907)-524-3323. – RS380 – Oct. 1 – April 30.

Nonresidents: One ram with full-curl or larger every four regulatory years – HT – August 10 – September 20 [DS197 & DS198]

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

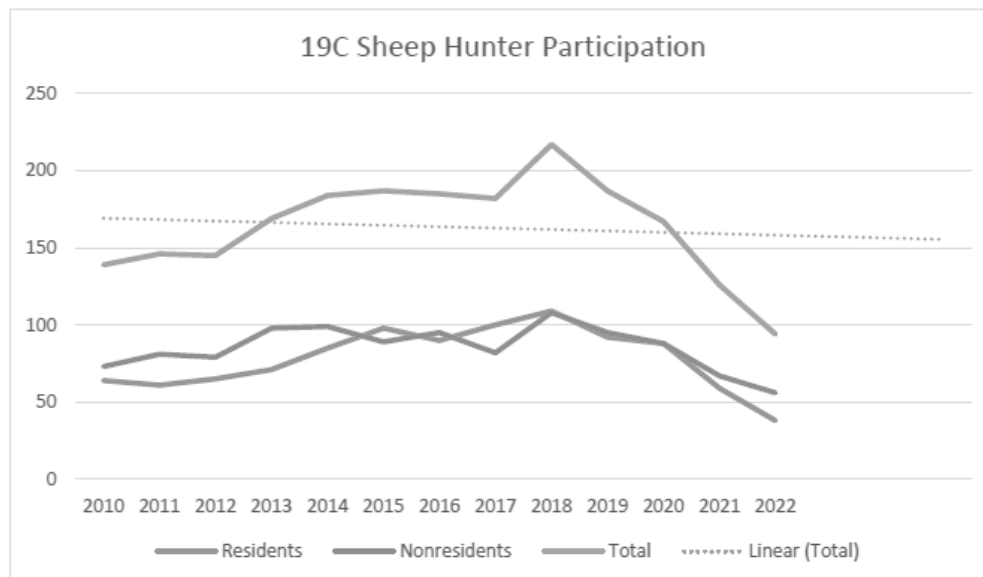
Reestablish a general season for Dall sheep in Unit 19C.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. Full-curl management is intended to preserve sheep hunting opportunity while conserving sheep. This regulation has allowed the department to have a longer hunting season and provides a chance for all to hunt a full curl ram. Full curl regulation has been the best management tool for over 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chance of survival diminishes within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams' makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Limiting harvest to full-curl rams ensures that the population's productivity is not affected by harvest.

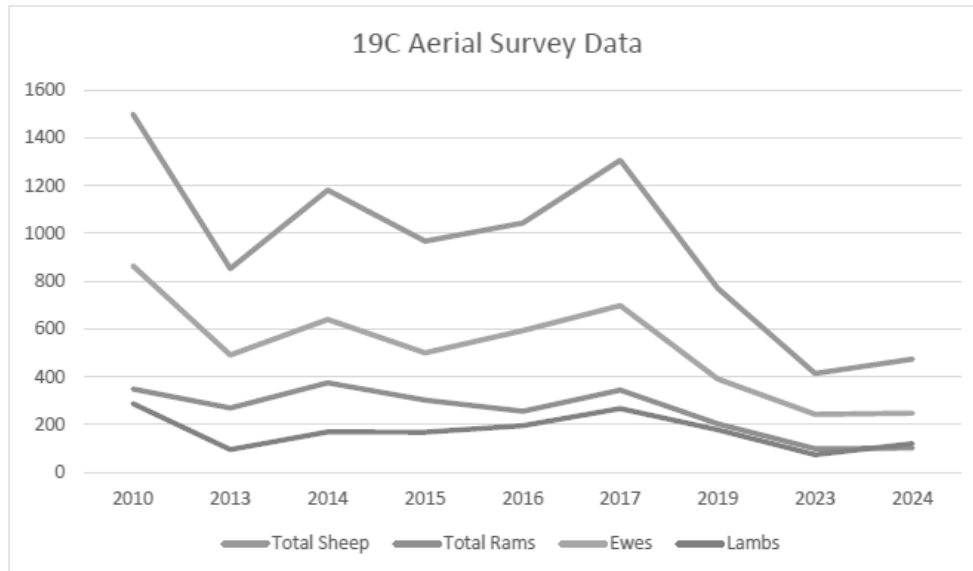
Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five-year period. Why? The short answer is self-regulation. ADF&G hunter participation records show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts on other areas of the state.

**Color Versions of the following tables can be found online at:*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>



Data pulled from ADF&G general harvest reports.



Data pulled from ADF&G Science Support Presentation to the Dall Sheep Working Group

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

No

PROPOSED BY: Jeff Rost

(OI-F26-202)

Proposal 110

5 AAC 85.055; 92.085. Hunting seasons and bag limits for Dall sheep; Unlawful methods of taking game; exceptions.

Amend regulations for sheep hunting in Unit 19C to sheep may be taken by residents and nonresidents by bow and arrow only as follows:

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

Amend regulations for sheep hunting in Unit 19C as follows:

In Unit 19C, sheep may be taken by residents and nonresidents by bow and arrow only.

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

Sheep populations in Unit 19C have declined in recent years, and the Board of Game has already taken restrictive management actions, including closure of the general season. These actions reflect concern about the sustainability of the population and the impact of harvest.

While closures and drawing permit hunts reduce harvest, they do so by substantially limiting or eliminating hunter opportunity. If the Board determines that reduced harvest is necessary, there

is an opportunity to achieve this objective through reduced harvest efficiency rather than reduced participation.

Archery hunting in alpine sheep habitat has a substantially lower success rate than rifle hunting. Restricting methods and means to archery equipment would be expected to significantly reduce overall harvest by reducing harvest efficiency, rather than by limiting participation.

An archery-only season would be expected to result in minimal harvest, similar to or lower than a closure, while restoring opportunity for hunters.

Compared to a full closure, an archery-only season would maintain opportunity for all hunters. Compared to a drawing permit hunt, it would provide substantially greater opportunity while likely resulting in equal or lower harvest levels due to reduced success rates.

Archery equipment is widely available and does not limit participation to a small or specialized group. Any hunter capable of participating in a sheep hunt can choose to hunt with bow and arrow equipment.

If no changes are made, management options may continue to rely on closures or drawing permits, both of which substantially reduce opportunity. This proposal offers an alternative approach that reduces harvest pressure while maintaining access for both resident and nonresident hunters.

This approach functions as a conservation tool that preserves opportunity while reducing harvest.

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

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

PROPOSED BY: Paul Forward (OI-F26-215)

Proposal 111

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI351, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI351.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-148)

Proposal 112

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to "Up To" 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 19 Bison drawing hunt DI352, to "Up To" 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI352.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-150)

Proposal 113

5 AAC 85.010. Hunting seasons and bag limits for bison.

Restrict nonresident hunting for Bison in GMU 19 as follows:

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

Remove non-resident pool for Bison

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

I would like to see Bison to resident only. There is a short supply of draw tags for Bison within the state, and the resident pool of applicants far exceeds availability. There is a lot of availability for bison hunting in the lower 48 for nonresident pool. There is minimal revenue to the state based on nonresidents applying and successfully drawing the tag.

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

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

PROPOSED BY: Brian Watkins

(OI-F26-039)

Proposal 114

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

Make changes to allocations in hunts RM653, DM681, and DM682 based on 2 year average bull to cow ratios as follows:

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

The Farewell area is an important resource for Alaska residents looking to get their moose meat. Therefore, when the 2-year average bull-to-cow ratio is below the management objective minimum of 30 bulls:100 cows hunters should be limited by using: 1) a first-come-first-serve limited registration permit for residents (RM653), and 2) a draw hunt for non-residents (DM681/682). Allocation should be 90% residents and 10% non-residents. When the 2-year average bull:cow ratio is above 30:100 resident registration permits (RM653) will be unlimited, and nonresidents will remain under the current drawing hunt structure with 20 permits issued (DM681/682).

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

Overharvest of bull moose in Unit 19C in the Farewell area. Moose hunting pressure at Farewell steadily increased through RY23 while at the same time the bull:cow ratio was declining. In March 2020 the board created a registration permit (RM653) for both residents and nonresidents in the Farewell area to better track hunter effort and harvest. In March 2023 the board created a draw

hunt for nonresidents (proposal 205) to address crowding issues and reduce the amount of harvest. Since RY24 there has been an unlimited number of registration permits available to residents and 20 draw permits issued to nonresidents. While the crowding issues have largely been addressed, bull:cow ratios continue to decline. Therefore, in RY26 the department is only going to issue 100 registration permits (RM653) to residents (first-come-first-serve) and 10 draw permits (7 DM681 and 3 DM682) to nonresidents.

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

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-173)

Proposal 115

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

Amend hunts RM653, DM681, and DM682 to Unlimited Registration for Alaskan Residents and limited to 10 Draw Permits for Non-Residents as follows:

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

Unlimited Registration for Alaskan Residents. 10 Draw Permits for Non-Residents. One Bull Per lifetime by Permit only for Non-Residents. "5" Non Resident permit to be allocated to Guides and "5" Non Resident Permits for the General Public. BOTH resident and Non Resident hunts for Moose to be held "Every Other Year" to ensure the Bull to Cow Ratio can be achieved and grow for Future Alaskan Hunters and youth.

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

Bull to Cow Ratio is at a "Critical" Low in the Farewell Area. Have hunted there for close to "30" years. We have to be "Stewards" of our precious Alaskan Resource. If we do not "ACT" swiftly and with no focus on ensuring the Bull to Cow ratio Improves, it will be a heartfelt disaster! We have to regulate ourselves for the Moose population.

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

I spoke with Hunters who I have shared Moose camp with at Farewell, both Resident and Non Resident Hunters. They 100% agree with the above Proposal for Farewell.

Robert McCaffrey, Chad McCaffrey, Lori McCaffrey, Paige McCaffrey, Grant Sullivan, Barb Eaton, Ben Eaton, Chris Diltz, Joey Diltz, Collin Pennington, Brian Wilson, Shane Wilson,

Stephen Olendorf, Neil Huey, Matt Huey, Mike Azerabeck, Mark Kasperg, Greg Kasperg, James Hunt, Jim Houschouer, Brooks Gehring, Warren Stough

PROPOSED BY: Robert McCaffrey (OI-F26-086)

**The following proposal was submitted with additional information and maps that can be reviewed on the Proposal Book webpage:*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Proposal 116

5 AAC 85.045; 92.069. Hunting seasons and bag limits for moose; Special provisions for moose and caribou drawing permit hunts.

Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents as follows:

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

Make the 19C Farewell registration area/nonresident draw area into a draw hunt area for both residents and nonresidents with up to 80 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents. 100 tags total. 80 % to residents and 20% to nonresidents (70% unguided and 30% guide required).

Suggested Regulation:

19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W

Residents – One bull - with spike-fork, 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM???** [RM653] September 1-20

Or

One bull - by permit available in person in McGrath and Nikolai beginning Jan 15; aircraft prohibited Jan 1-Feb 28. RM655. Feb 1-Feb 28.

Nonresidents – One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side DM681 (unguided, 70% of nonresident tags) & DM682 (guided, 30% of nonresident tags) September 1-20.

Nonresidents may only put in for DM681 or DM682, not both.

If nothing is done, the bull moose population will continue to be overharvested which will further depress the bull to cow ratio, causing a portion of the cow population to go unbred. If these trends continue, the department will have no choice but to implement further restrictions. Restrictions could include further limitations on both resident and nonresident opportunities, shortening the season, deleting the spike/fork regulation, or even an emergency closure or a combination of the aforementioned. Furthermore, the degradation of the land and increase of trash and debris on the Farewell strip and the surrounding area will continue to worsen.

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

I am concerned about the overall moose population of the Farewell area in 19C (RM653, DM681 & DM682) and believe regulations and/or restrictions are in order. I'm equally concerned about

the blatant disregard shown by users of the Farewell airstrip, which is Federal Aviation Administration (FAA) lands, surrounding State lands, nearby Cook Inlet Regional Inc (CIRI) lands, Bureau of Land Management (BLM) lands, resources, and wildlife within the area. The amount of trash, fuel drums (empty and full), and All Terrain Vehicles (ATV) left at the taxiway and hidden in the bushes that hunters leave behind is appalling. There are more heavily hunted public lands in Alaska that are cleaner than the Farewell airstrip. The length of the airstrip, the many ATV trails and historic jeep trails that spider out from Farewell and its relative proximity to Anchorage, make it a popular moose hunting destination for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt.

Over the past three decades the moose seasons have been shortened and horn restrictions have been put in place to maintain a healthy moose herd. In 2010 a massive forest fire swept through the area burning over 81,000 acres. Coincidentally or not the past decade has seen an influx of moose hunters. While the fire created prime habitat for moose it inadvertently hurt them by destroying the area's dense cover, thus making it easier for hunters to visually spot moose and making it easier to traverse the area via ATV to pick off any and every legal bull within the area.

The Farewell registration hunt area (See exhibit 1) is comprised of 382 square miles and was created by the Board Of Game (BOG) 5 years ago in RY20 to achieve a more accurate grasp of the number of moose hunters and moose harvested within the Farewell area. See the table below that was provided by the Alaska Department of Fish and Game (ADF&G).

Farewell permit and harvest data for RY21 - RY25.

		Permits Issued	DNH	Hunted	Killed
2021	RM653	229	35	193	96
2022	RM653	224	25	198	104
2023	RM653	253	40	213	96
2024	RM653	124	24	100	62
	DM667	20	6	14	11
	2024 Total	144	30	114	73
2025	RM653	142	25	117	52
	DM681	14	4	10	10
	DM682	6	0	6	4
	2025 Total	162	29	133	66

Multiple proposals were submitted at the previous region 3 meeting to address the issues. The BOG passed and implemented a drawing (DM681 & DM682) for nonresidents in 2024 and 2025 of up to 20 permits. With the nonresident draw in place, the 2024 season saw a decrease from 213 participants to 114. However, in 2025 the number of resident participation increased 17%.

As seen in the table above, 2023 saw the largest number of permits issued at 253 with 213 actively participating in the hunt. That equates to 1 moose hunter for every 1.79 square miles within the Farewell hunt area. Since the implementation of the non-resident draw in RY24, that changed to 1 moose hunter for every 2.87 square miles.

or a bit of perspective, the remainder of game management unit 19C saw 1 moose hunter for every 44 square miles and on average, the same number of bulls are harvested each year within this 382 square mile area as the remainder of the 6,328 square miles of unit 19C (See exhibit 2 with regards to 19C and the Farewell area highlighted within).

To get ahead of the rising resident participation and the declines in the bull-cow ratio, the department issued RM653 Farewell Moose Update on March 4, 2026 (Exhibit 3), which is to put residents on a limited registration hunt of 100 permits and reduce nonresident tags to 10 for RY26.

The department has found that the Farewell area moose population is migratory, based on a cow moose collar study. The study shows that much of the Farewell moose population spends the spring and summer months west of Farewell in unit 19D and migrates east to 19C in the late summer, early fall, spending the fall and winter there. Based on the 2024 Annual Report to the Alaska BOG on Intensive Management plan for Moose with Wolf, Black Bear, and Grizzly Predation Control in Game Management Unit (GMU) 19D East, one can easily conclude that there is a direct correlation between the moose in 19D East and those in the Farewell area. For example, after the removal of 109 bears in 2002 and 2003 in 19D East the number of moose increased across the board and the Farewell moose hunt became popular. The last couple of years have shown significant declines across the board in 19D East and Farewell. The data indicates that the bear population is back and having a direct impact on moose recruitment and thus, declines in harvest. Based on the report it indicates that another 100 or so bears need to be removed from 19D East again to help the moose population rebound and achieve the objective of 1.0 moose per square mile.

According to 2025 ADF&G survey, the bull to cow ratio is 21 to 100 in the Farewell area (See table below provided by ADF&G). According to the department, the ideal ratio is 30-35 bulls to 100 cows for the area and has not reached that standard in the past five years. To get the ratio back up, a cap needs to be put on the number of bulls harvested within the Farewell area.

Composition survey results from the Farewell TCA during 2017-2024.

Year	Total Moose	Total Calves	Total Bulls	Total Cows	Percent Calves	Calves: cows	Bull: Cow
2017	322	55	74	193	17%	28:100	38:100
2018	544	68	136	340	13%	20:100	40:100
2020	681	86	148	447	13%	19:100	33:100
2021	540	61	96	383	11%	16:100	25:100
2022	465	54	91	320	12%	17:100	28:100
2023	739	47	153	539	6%	9:100	28:100
2024	702	84	125	493	12%	17:100	25:100
2025	486	50	75	361	10%	14:100	21:100

Year	Total Moose	Total Calves	Total Bulls	Total Cows	Percent Calves	Calves: cows	Bull: Cow
2 Year Average					11%	16:100	23:100

Circumstances such as those the Farewell hunt area is experiencing now occurred in GMU Unit 24 and the northern section of GMU 21D along the Koyukuk River and could serve as case precedent for the Farewell area.

While Units 24 and 21D are much larger in scale and include multiple villages, the percentages of moose hunters versus successful harvest, and the increase in hunting pressure over a 10-year period, is similar. In 1988 the moose harvest success rate was 60%. Eleven years later, with 731 moose hunters, the success rate had dropped to 50%. In addition to human harvest, a significant increase in the area's wolf population took place during this time that took a large toll on the overall moose herd. The Koyukuk River Moose Management Plan (KRMMP) was developed in conjunction with ADF&G Division of Wildlife Conservation and the Koyukuk River Moose Hunters' Working Group (KMWG or working group). The BOG adopted regulatory proposals in the fall of 2000 that were spawned by the working group and in the 2001 spring meeting the BOG voted unanimously to support the process and endorse the KRMMP. The working group established a baseline maximum number of hunters based on moose biology concerns and what is considered a quality hunting experience. The general registration was changed to a draw hunt with separate resident and nonresident drawing pools. Separate draws were established to retain opportunity for nonresidents and commercial guides based on user group history. The working group met after the completion of the 2000 hunting season to review the regulation changes. Members of the working group all agreed that the season was greatly improved and that both local and nonlocal hunters enjoyed a higher quality hunt than in years past. A 2021 moose trend survey summary conducted by the Department of Interior Federal Subsistence Management Program through aerial survey shows a stable and healthy bull to cow moose population.

To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the Farewell area, I suggest establishing a moose draw permit for all user groups.

Based on the rich history of the area, from the 1940's Army air station, the pioneers of the guiding industry and the makeup of the historical user groups, I suggest the Farewell area go to a draw for both residents and nonresidents with up to 80 tags for residents, 14 tags for unguided nonresidents, and 6 tags for guided nonresidents. 100 tags in total. The justification for 100 tags is based on the past 5 years of permits issued, permits used, and harvest data. This data indicates an estimated harvest of 44± bulls a year from the Farewell area. However, it can be expected that the harvest to be slightly higher due to the area being relatively small with lack of heavy cover and easy navigation via ATV.

The implementation of a moose draw for residents in the Farewell area will eliminate the subsistence opportunity during the fall hunting season. However, according to the reports by the ADF&G, only one participant from Ketchikan, one from Sitka and one from North Pole have participated in this hunt in the past five years (Exhibit 4). The report shows no one from the local

region has participated in the hunt since the registration hunt was created. Only 5% of 19C's 6,710 square miles would be affected and the winter subsistence hunt RM655 for bull moose shall remain in place for a subsistence opportunity. To my knowledge, there are no year around residents of the area, and the nearest rural community lies 38 air miles away.

In closing, it's a supply and demand situation. The current demand for bull moose in the Farewell hunt area cannot be sustained with the current moose population and its downward trend. Recent regulation changes implementing a draw for non-residents are not enough. The bull to cow ratio continues to decline as does the calf recruitment, while the resident participation continues to increase. If the current users want to keep and maintain a 20-day season with the spike/fork, 50 inch, and or 4 brow point regulation, now is the time to put a cap on the number of hunters within the Farewell area before the area is shut down by Emergency Order.

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

Yes. I received moose data and the tables listed above from the ADF&G area biologist. I also reached out to the Vice Chairman of the McGrath advisory committee and was told that the committee has been in favor of a draw for quite a while. I was urged to submit the proposal, and they would look at it next winter.

PROPOSED BY: Spencer Pape

(OI-F26-061)

Proposal 117

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

Transition to a fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C as follows:

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

Transition to a **fully draw-based system for both residents and nonresidents in the Farewell RM653 area of 19C**

1. Unified Draw System

- Replace the resident registration system with a draw system
- Maintain separate applicant pools for residents, unguided nonresidents and guide required nonresidents.

2. Allocation Structure

- Establish a defined percentage split (eg. 70% resident / 25% unguided nonresident / 5 % guide required nonresident) rather than fixed tag numbers
- Adjust total permits annually based on population data

3. Outcome-Based Management

- Set annual tags based upon desired take of moose goals and actual harvest success rates
- Adjust allocation percentages annually based on:
 - Moose population data
 - Hunter success rates
 - Cow : Bull ratio
 - Cow : Calve ratio

Suggested Regulation:

19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W

Residents – One bull - with spike-fork, 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM653** [RM653] September 1-20

Or

One bull - by permit available in person in McGrath and Nikolai beginning Jan 15; aircraft prohibited Jan 1-Feb 28. **RM655**. Feb 1-Feb 28.

Nonresidents unguided – One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM681** September 1-20.

Nonresidents guide required - One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. **DM682** September 1-20.

70% of the tags to residents / 25% to unguided nonresidents / 5% to guided nonresidents

Nonresidents may only put in for **DM681** or **DM682**, not both.

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

Subject:

Implementation of a Draw-Based Allocation System for Residents & Nonresident Moose Hunting Permits in Mixed-Use Public Lands in the Farewell **RM653** area of 19C

Executive Summary

This proposal recommends the implementation of a regulated draw system to allocate nonresident moose hunting permits in specific Alaska game management units where hunting pressure is high and access is supported by federally funded infrastructure. The goal is to balance resident opportunity, maintain economic benefits from nonresident hunters, maintain the

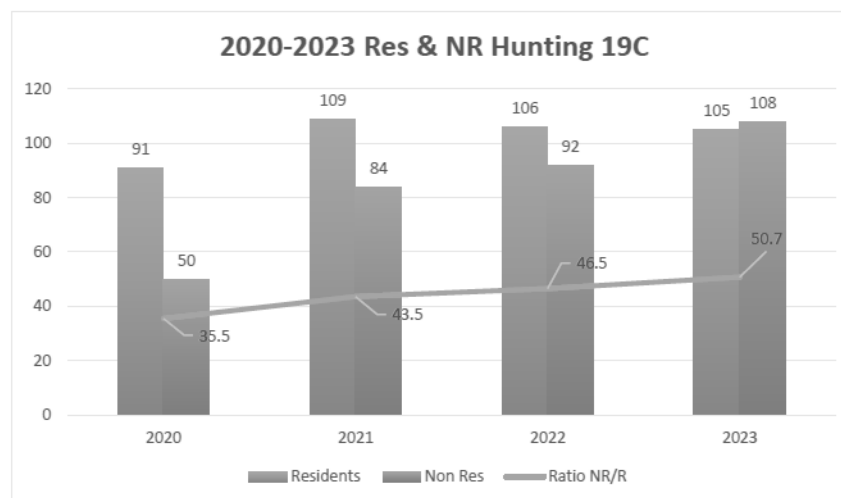
historical guiding industry of the area and ensure sustainable wildlife management aligned with established conservation principles.

Background and Justification

In the identified hunt area, RY26 current regulations allocate hunting opportunity as follows:

- Residents: 100 permits available through a limited registration system RM653
- Unguided Nonresidents: Limited to 7 permits issued through the draw system DM681
- Guide required Nonresidents: Limited to 3 permits issued through the draw system DM682

Despite this structure, historical hunt data, that before Nonresident draw was implemented, residents account for approximately **55%** of participation, while nonresidents account for **45%**.



Data from Alaska Dept of Fish and Game

A color version of this graph is available online at

<https://www.adfa.alaska.gov/index.cfm?adfa=aameboard.proposalbook>

This imbalance raises concerns regarding equitable access for Alaska residents, particularly in areas where:

- Access is facilitated by federally funded infrastructure including departing airports and the Farewell Airport
- Portions of the land are managed by the Bureau of Land Management

Because these lands and access points are supported by national public funding, they represent a shared resource. However, the State of Alaska retains the authority and responsibility to manage wildlife for the benefit of its residents while balancing broader public interests.

This hybrid approach may unintentionally produce inequitable outcomes and reduce transparency in allocation fairness. At the same time, nonresident hunters provide essential revenue through higher licensing fees and contribute to local economies through outfitters and guides currently offering services in 19C.

Although the current system heavily favors residents in permit allocation (100 resident permits vs. 10 non-resident tags), actual moose population show challenges from:

- Total moose population oscillation recently trending downward
- Bull to Cow ratio below 30:100 target
- Calving recruitment
- Grizzly, Black Bear and Wolf predation

Benefits of the Proposal

Balanced Access Ensures residents retain primary access while preserving opportunities for nonresidents

Resource Sustainability

Supports controlled harvest levels aligned with biological data

Fairness and Transparency

A draw system replaces uncertainty and perceived inequities with a clear, rule-based allocation process

Conclusion

This proposal offers a balanced, data-driven approach to moose hunting allocation in the Farewell area of 19C. By implementing a structured draw system, the Alaska Board of Game can ensure equitable access, sustain wildlife populations, and maintain the economic and conservation benefits associated with both resident and nonresident hunters.

Statement to the Board

The Alaska Board of Game is uniquely positioned to ensure that Alaska's wildlife resources are managed with both fairness and long-term sustainability in mind. The current system—combining a resident registration structure with a nonresident draw—creates inconsistent allocation methods and has resulted in disproportionate harvest outcomes despite significant differences in permit numbers. By transitioning to a unified draw system with clearly defined allocation percentages, the Board can improve transparency, align opportunity with actual harvest impact, and reinforce public confidence in the regulatory process. This approach maintains Alaska's commitment to resident access while still recognizing the economic and shared-use considerations tied to federally supported lands and access infrastructure.

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

No.

PROPOSED BY: Thomas Jones

(OI-F26-129)

Proposal 118

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

Change bag limit in RM653 to One bull every two regulatory years with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side as follows:

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

I would like to recommend a change to the bag limit for the RM653 hunt in Unit 19C. There would be no change to antler restrictions or season dates, but if a resident hunter harvests a moose under RM653, they would be ineligible to receive an RM653 permit the next year. There would be no changes to the nonresident permit hunt because they already can't get a permit 2 years in a row under the drawing permit rules.

RM653 Proposed language: One bull every two regulatory years with spike-fork antlers 50-inch antlers or antlers with 4 or more brow tines on at least one side by permit available online at hunt.alaska.gov, or in person in McGrath, Anchorage, Fairbanks and Palmer, beginning August 1

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

Overharvest of bull moose in Unit 19C in the Farewell area. Moose hunting pressure at Farewell steadily increased through RY23 while at the same time the bull:cow ratio was declining. In March 2020 the board created a registration permit (RM653) for both residents and nonresidents in the Farewell area to better track hunter effort and harvest. In March 2023 the board created a draw hunt for nonresidents (proposal 205) to address crowding issues and reduce the amount of harvest. Since RY24 there has been an unlimited number of registration permits available to residents and 20 draw permits issued to nonresidents. While the crowding issues have largely been addressed, bull:cow ratios continue to decline. Therefore, in RY26 the department is only going to issue 100 registration permits (RM653) to residents (first-come-first-serve) and 10 draw permits (7 DM681 and 3 DM682) to nonresidents.

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

No, except that the McGrath Area Management Biologist was consulted for background proposal language.

PROPOSED BY: Steve Chronic

(OI-F26-089)

Proposal 119

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

Reduce Season to Sept 1 – Sept 15 for Moose Permit RM653 as follows:

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

Moose 19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W (Farewell Area), Permit RM653, Reduce Season to Sept 1 – Sept 15.

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

Over the past 5 years the department has issued an unlimited number of RM653 permits. Beginning in 2024, the BOG significantly reduced nonresident hunters in the Farewell area from approximately 100 hunters to 20 hunters. This BOG action was taken in an effort to both improve the bull cow ratio and to reduce user conflicts. After two seasons of reduced hunting effort the, bull cow ratio continues to decline below ADFG population objective.

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

Consulted several Alaska residents who hunt in the unit. Most agree a shorter season could help reduce take allowing the population to recover from over harvest.

PROPOSED BY: Brad Hinkes

(OI-F26-117)

Proposal 120

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

Amend Moose hunt under Permit RM653 to a Quota Hunt as follows:

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

Moose 19C west of the South Fork Kuskokwim, East of the Windy Fork Kuskokwim and north of a line between 62° 24' N, 154° 7' W and 62° 30' N, 153° 32' W (Farewell Area), Permit RM653 (unlimited permits issued), Quota Hunt, Sept 1 – Sept 20. Successful permit holders are required to report harvest within 12hrs of take to ADFG. Hunt will be closed by Emergency Order when the quota has been reached.

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

Over the past 5 years the department has issued an unlimited number of RM653 permits. Beginning in 2024, the BOG significantly reduced nonresident hunters in the Farewell area from approximately 100 hunters to 20 hunters. This BOG action was taken to both improve the bull

cow ratio and to reduce user conflicts. After two seasons of reduced hunting effort, the bull cow ratio continues to decline below ADFG population objective.

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

Consulted several Alaska residents who have hunted this area for many years. We believe this proposal would allow ADFG to best control over moose take in the permit area, prevent continued over harvest, allow the moose population to recover, while providing an opportunity for all hunters to participate in the hunt. Many camps and transporter schedule 2 hunt periods to accommodate 2 groups of hunters during the 20-day

season. With an Emergency closure likely to occur before the 20th, a 2nd hunt party is less likely to occur, reducing take.

PROPOSED BY: Cynthia Hinkes

(OI-F26-139)

Proposal 121

5 AAC 92.150. Evidence of sex and identity.

Change salvage rules for antlers with a spread of 55" or more as follows:

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

Page 22

In hunts with antler/horn restrictions, antlers/horns must be salvaged and may not be altered unless required by permit conditions. Antlers must remain naturally attached to the unbroken/uncut skull plate if the required number of brow tines are not [AREN'T] present unless the animal has a spread of 55" or more.

Page 30 (in bold)

Antlers must be salvaged where there are antler restrictions; such antlers must remain naturally attached to the unbroken or uncut skull plate if the required number of brow tines are not present unless antler spread is 55" or more. If antlers must be salvaged, they may not be altered prior to completion of all salvage requirements unless antler spread is 55" or more.

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

A moose which is clearly legal by spread should not be subject to brow tine restrictions or skull plate/antler alterations.

Justification:

Safety: Large sets of antlers can be very difficult to transport particularly in small planes where they often become dangerous external loads by necessity.

Economics: Large sets of antlers have negative economic impacts on transportation costs to the hunter due to bulk, particularly in aviation.

Taxidermy: Current industry standards can reconstruct animals skull/antlers to their natural state.

Regulations: Page 30 of current regulations state: "However, if the antlers are 50 or more inches wide, it doesn't matter how many brow tines are present, the moose is legal."

The intent of the current 50"/brow tine restriction regulations exist to assess moose antler spread BELOW 50", NOT over 50". It is reasonable to believe the field reconstruction of an altered skull plate and/or antlers of a bull moose 55" or greater would be sufficient to justify a legal moose by spread alone.

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

Yes. Several discussions with a former Fish and Wildlife employee and also a former Board of Game member through Michael Litzen of Litzen Guide Service.

Lastly, though I have applied this to 19C/Interior-Arctic regions it may well need to be considered state wide.

PROPOSED BY: Lex Patten

(OI-F26-030)

Proposal 122

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

Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653 as follows:

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

Establish a Tier Permit Hunt Area in Unit 19C, Farewell area defined by Registration Hunt RM 653.

Request the Subsistence Division to assist the Board do come up an Amount Necessary for Subsistence

(ANS). Scoring should be based on land ownership within the unit, number years hunting/eaten meat from the unit and years as an Alaska resident.

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

I have been going to Farewell for 48 years. In 1981, I staked 25 acres through the State's Remote Parcel Program within RM653 hunt area. Over time, I built a cabin, outbuildings, and a runway. My family spends 4-6 weeks there each year from May through September. I harvested my first moose in 1980, and we have taken one at Farewell every year since, along with caribou, bison,

sheep, and both black and brown bear. Farewell is more than a hunting area—it is a central part of our lives, and protecting its resources is a top priority.

Over the decades, I've seen major changes. In the 1980s, hunters were scarce, and the season ran through October 10. Today, it is a limited registration hunt. While ADFG has managed harvests well, moose numbers continue to decline despite restrictions. As a long-time subsistence user, I am concerned our opportunity to harvest moose is at risk. Others who have hunted here for 20–30 years face the same issue. I ask the Board to protect long-term subsistence users until the population recovers.

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

Consulted several Alaska residents/long term users of the unit. All who I spoke to were in favor of this proposal.

PROPOSED BY: Michael Hinkes

(OI-F26-059)

Proposal 123

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

Shift the season dates for all moose hunters in Unit 21A from September 5-25th to September 1-20 as follows:

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

The McGrath AC would like to shift the season dates for all moose hunters in Unit 21A. Currently the season is September 5-25th and this proposal would make the season September 1-20. This change will maintain 20 days of opportunity, and two 10-day hunt periods which is important to guides and transporters. We anticipate an earlier season end date will result in a small reduction in harvest which should stop the decline in the bull to cow ratio.

(19)

Unit 21(A) RESIDENT HUNTERS: 1 antlered bull by registration permit only **Sept. 1 – Sept. 20** [SEPT. 5 - SEPT. 25] NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by registration only **Sept. 1 – Sept. 20** [SEPT. 5 - SEPT. 25]

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

Overharvest of bull moose in Unit 21A. Moose hunting pressure in unit 21A has been steadily increasing over the last 10 years, while at the same time the bull:cow ratio has been declining. The McGrath AC would like to reduce harvest slightly in an effort to stop this decline and ensure the bull:cow ratio remains above 25 bulls:100 cows.

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

This proposal was developed by the McGrath AC and was unanimously supported.

PROPOSED BY: McGrath Fish & Game Advisory Committee (OI-F26-177)

Proposal 124

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during part of February and March in Unit 21E as follows:

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

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

(19)

Unit 21(E)

...

RESIDENT HUNTERS:

...

1 moose, by registration permit
only, a person may not take a cow
accompanied by a calf

Feb 15 – Mar 15

...

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The goal of reauthorizing is to provide additional harvest opportunity and meet harvest objectives.

The most current survey results from 2025 indicated there are approximately 11,400 moose in Unit 21E, which is slightly above the intensive management (IM) population objective of 9,000–11,000 moose. Based on the population estimate of 11,400 moose, there is currently a harvestable surplus of approximately 450 moose; however, many of those moose are not accessible in the fall.

Approximately 200 moose are harvested each fall along the rivers. The most recent fall composition survey in 2024 showed 33 bulls per 100 cows and 41 calves per 100 cows. The IM harvest objective for Unit 21E is 550–1,100 moose.

Within the Unit 21E moose survey area (4,094 mi²), the overall moose density increased from 1.0 moose/mi² in 2000 to 2.0 moose/mi² in 2025. Twinning surveys were conducted in 2024 and 2025 in the Holy Cross area, and the average twinning rate for those 2 years was 41%. Browse utilization remains high in the Holy Cross area where the population density is highest and winter mortality in deep snow years is a concern.

Additional harvest opportunity is available. Winter hunts distribute hunter pressure temporally and allow access to areas inaccessible in the fall.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-018)

Proposal 125

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

Extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit to Feb 15th – March 31st as follows:

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

The GASH AC would like to extend the season dates for resident moose hunters in Unit 21E for the winter any moose (except cows with calves) hunt on the RM837 registration permit. Currently the season is Feb 15th – March 15th, and this proposal would make the season Feb 15th – March 31st. This change will provide an extra two weeks of hunting opportunity during a period that typically experiences warmer weather, and improved snow conditions for travel. We anticipate this change may improve the harvest on the RM837 permit, which is extremely low (average = 7.3 moose/year). The most recent population estimate (2025) for 21E is above the IM objective range of 9,000-11,000, which supports the liberalization of the winter moose hunting season.

(19)

Unit 21(E) RESIDENT HUNTERS: 1 moose by registration permit only, a person may not take a cow accompanied by a calf **Feb. 15 – Mar. 31** [FEB. 15 - MAR. 15] NONRESIDENT HUNTERS: No open Season

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

Weather (extreme cold) and snow levels often make the Feb 15 – Mar 15 difficult for residents of the GASH (Grayling, Anvik, Shageluk, and Holy Cross). Extending the season for an additional two weeks to the end of March would provide more opportunities to harvest moose for residents that were unable to harvest during the fall season.

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

This proposal was developed by the GASH AC and was unanimously supported.

PROPOSED BY: Grayling/Anvik/Shageluk/Holy Cross (GASH) Fish & Game Advisory Committee
(OI-F26-170)

Proposal 126

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

Amend Bear baiting in Unit 19 to two seasons July 1 - Oct 31 /Apr 1 - Jun 30 as follows:

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

With the cost of fuel going up in the past few years and also with current fuel prices and possibility of fuel going up even higher for boat gas, the Bethel AC has proposed a change in season dates for Bear Baiting in Unit 19. With these new dates, it will put less stress on the hunters / subsistence users for with-in Unit 19, especially when the hunters / subsistence users have to remove their bear bait equipment and put it back up with-in 30 days.

Bear Baiting New Proposed Dates -----July 1st -Oct 31st / Apr 1st – June 30th

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

The Bethel AC would like to Propose a change of Season Dates for Unit 19 Bear Baiting. With the current regulations the Hunter / Subsistence User is required to pull their Bear Baiting Sites by June 30 and if they want to Bear Bait again, they have to wait until Aug 1st to do so. The amount of time that is put to get the sites setup is time consuming. With there being a No Closed Season for Brown and Black Bears the Hunters / Subsistence User will have a better opportunity for taking bears that are in season for Bear Baiting.

Unit 19 Bear Baiting Season -----Aug 1st to Oct 31st / Apr 15th – June 30th

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

PROPOSED BY: Bethel Advisory Committee
(OI-F26-068)

Proposal 127

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

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations as follows:

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

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round harvest of beaver with no bag limit under the small game hunting regulations.

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

Currently, there is no open small game hunting season for beaver in Unit 19, while the neighboring Unit 18 allows year-round harvest with no bag limit. This inconsistency in regulations creates unnecessary restrictions for residents of Unit 19, particularly those who rely on beaver as a subsistence food source.

Beaver have a long history of use in Alaska for both their meat and fur. Under current regulations, residents of Unit 19 are prevented from harvesting beaver opportunistically for food when they encounter them outside of trapping seasons. This limits access to a valuable subsistence resource and creates confusion between adjacent units with similar ecological conditions.

If no change is made, Unit 19 residents will continue to face unnecessary barriers to harvesting beaver for food, despite healthy populations and more liberal regulations in neighboring Unit 18. Aligning regulations would improve subsistence opportunity and regulatory consistency without negatively impacting the resource.

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

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee (OI-F26-083)

Proposal 128

5 AAC 84.270. Furbearer trapping

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit as follows:

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

Adopt regulations in Unit 19 that mirror Unit 18 by allowing year round trapping of beaver with no bag limit.

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

Currently, trapping season for beaver in Unit 19 has a season from Sept 1-June 10, while the neighboring Unit 18 allows year-round harvest with no bag limit. This inconsistency in regulations creates unnecessary restrictions for residents of Unit 19, particularly those who rely on beaver as a subsistence food source.

Beaver have a long history of use in Alaska for both their meat and fur. Under current regulations, residents of Unit 19 are prevented from harvesting beaver for food by trapping them. This limits access to a valuable subsistence resource and creates confusion between adjacent units with similar ecological conditions.

If no change is made, Unit 19 residents will continue to face unnecessary barriers to harvesting beaver for food, despite healthy populations and more liberal regulations in neighboring Unit 18. Aligning regulations would improve subsistence opportunity and regulatory consistency without negatively impacting the resource.

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

This proposal is being submitted by the Bethel Fish and Game Advisory Committee.

PROPOSED BY: Bethel Fish and Game Advisory Committee

(OI-F26-082)

Tok Area - Units 12 & 20E

Proposal 129

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

Establish a Tier II hunt for the Fortymile caribou herd as follows:

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

Add a Tier II Subsistence hunting permit hunt for the Fortymile caribou herd (FCH) in Units 12, 20(D), 20(E), and 25(C) outside of the Fairbanks Nonsubsistence Use Area. The number of permits available, seasons, and bag limits will need to be determined by the Board of Game (board).

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

(15)

...

Units 20(B) and 20(F), those portions south of the Yukon River, and north and east of a line formed by the Richardson Highway from the Unit 20(D) boundary to its intersection with the Steese Highway, north along the Steese Highway to its intersection with the Elliot Highway, then northwest along the Elliot Highway to its intersection with the Dalton Highway, then north along the Dalton Highway to the Yukon River, and Unit 20(D) that portion north of the south bank of the Tanana River

RESIDENT HUNTERS:

1 caribou, per lifetime
of a hunter, by youth hunt

Aug. 1—Aug. 21

drawing permit; up to 30 total permits may be issued; or

Up to 3 caribou by registration permit only; or

Aug. 1—Sept. 30
Oct. 21—Mar. 31

1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during Dec. 1 - Mar. 31

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

1 bull by registration permit only

Aug. 10—Sept. 30

...

Unit 20(E)

RESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

Up to 3 caribou by registration permit only; or

Aug. 1—Sept. 30
Oct. 21—Mar. 31

1 caribou by registration permit only, during a season for up to three days that may be announced by emergency order within a portion of the area during the period Oct. 20 - Nov. 30; or

(Season to be announced by emergency order)

1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during Dec. 1 - Mar. 31

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

1 bull by registration permit only

Aug. 10—Sept. 30

...

(20)

...

Unit 25(C)

RESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

Up to 3 caribou by registration permit only; or

Aug. 1—Sept. 30
Oct. 21—Mar. 31

1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during Dec. 1 - Mar. 31

(Season to be announced by emergency order)

NONRESIDENT HUNTERS:

1 caribou, per lifetime of a hunter, by youth hunt drawing permit only; up to 30 total permits may be issued; or

Aug. 1—Aug. 21

1 bull by registration permit
only

Aug. 10—Sept. 30

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

Establish a Tier II hunt in regulation for the Fortymile caribou herd in Units 12, 20(D), 20(E), and 25(C), outside the Fairbanks Nonsubsistence Area (FNSA), as required by statute, in case a Tier II hunt is needed to further restrict the take of this game population to meet sustained yield and subsistence law mandates. The board made a positive customary and traditional use finding for the FCH in Units 12, 20(D), 20(E), and 25(C), outside the FNSA and determined an amount reasonably necessary for subsistence uses (ANS) of 350–400 caribou.

Following years of steady increase, the herd reached peak population size of 83,000 caribou in 2017, which was at or above the last peak observed in the early 1960s. The herd has now been declining over the past 9 years at an average of 14% per year. Lower parturition rates of 3-year-old cows, and reduced weights of newborn and four-month-old calves indicate the nutritional condition of the herd declined as the herd reached or exceeded the carrying capacity of the range. Lower annual survival and productivity, along with intentional reductions of the herd through an increase in harvest in 2020 and 2021 to lessen the impact to the range, resulted in a decline to 29,000 caribou by 2024 and a modeled estimate of 24,000–28,000 caribou in summer 2025. The department has not observed strong indication that productivity or annual survival have begun to improve, suggesting the herd is likely to continue to decline during the next several years.

The 2025 harvestable surplus was estimated at 480–560 bull caribou. However, if modeled estimates of decline continue, the population is projected to be 17,500 or fewer caribou at some point during 2028–2030. At this population level, harvestable surplus will drop below the lower bound of the ANS range and the board may wish to consider whether current regulations continue to provide reasonable opportunity for subsistence uses or whether replacing the current hunt structure with a Tier II hunt is necessary if harvestable surplus is unable to provide for all subsistence uses.

The current hunt structure was developed by the Fortymile Harvest Coalition and is outlined in the Fortymile Harvest Management Plan which has been reviewed and readopted by the board on a regular basis. It includes a fall and winter unlimited registration hunt in Units 20B, 20D, 20E, 20F, and 25C, with harvest quotas partitioned into zones to disperse hunting pressure and allow maximum hunting opportunity by various user groups and communities (Figure 1). A significant portion of the annual FCH range and harvest occurs in the FNSA in Units 20B, 25C, and 20D. Over the past 10 years, an average of 292 caribou were harvested annually from within the FNSA by resident hunters in the fall, representing 21% of the total annual fall harvest. Over the same time

period, an average of 114 caribou were harvested annually from within the FNSA by residents during the winter hunt, representing 16% of the total annual winter harvest. Over the past 10 years, satellite linked collars on FCH have shown that 69% of the collar locations occur outside the FNSA during the fall hunt period and 70% of the collar locations occur outside the FNSA during the winter hunt period.

The board may not authorize subsistence hunting in nonsubsistence areas. In these areas, the subsistence priority does not apply, which may complicate or limit regulatory options if a Tier II subsistence hunt is established, see again, Figure 1. Approximately 79% and 74% of the harvest in the fall and winter respectively occur outside of the FNSA. If the harvestable surplus is below the lower end of the ANS range, the state subsistence law states that opportunity shall be allocated according to Tier II criteria. If there is no Tier II regulation, then the department does not have the authority to distinguish among subsistence users and will be required to close all opportunity (all existing hunts including hunt areas outside the NSA) until the board can take action.

The board will need to determine appropriate seasons, bag limits, and the maximum number of Tier II subsistence permits that can be issued for the Tier II hunt.

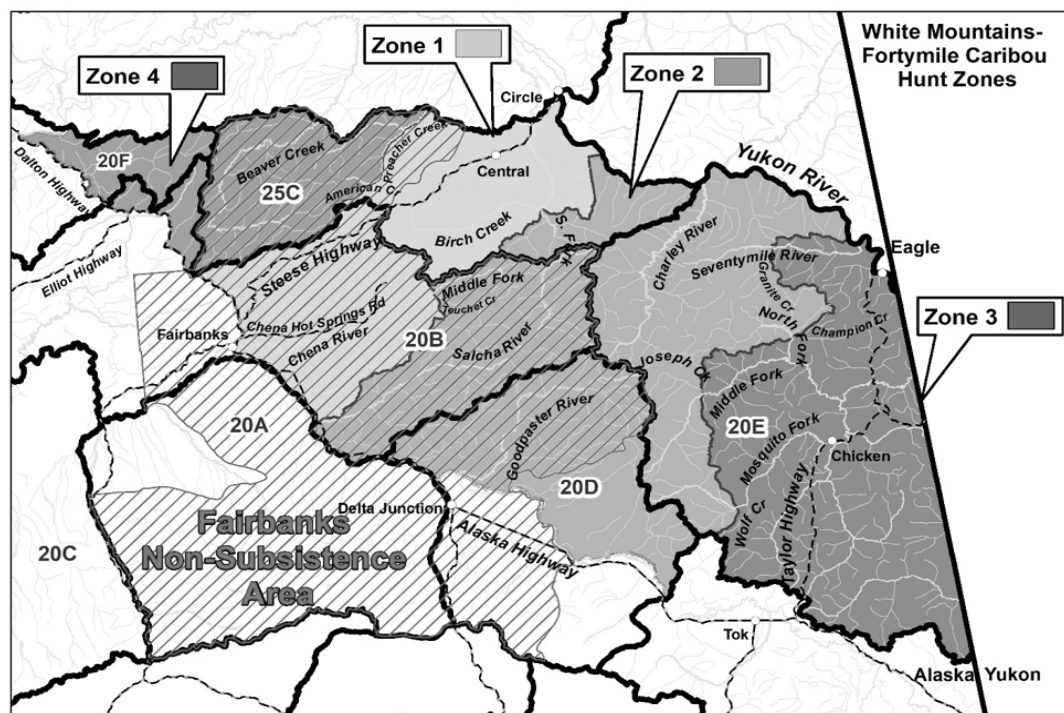


Figure 1. Fortymile caribou herd hunt zones and the Fairbanks Non-Subsistence Area. A color version can be found online at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Proposal 130

5 AAC 85.025; 92.050. Hunting seasons and bag limits for caribou; Required permit hunt conditions and procedures.

Make changes to non resident hunt allotment for 40 mile Caribou herd based on harvestable quota as follows:

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

When the overall quota is above 1,000, allow nonresident hunting in all zones.

When the quota is between 400 and 1,000, authorize nonresident hunting only in Zone 2 under a limited draw permit hunt. Issue nonresident draw permits equal to 50 percent of the Zone 2 quota. These draw permits would not be subject to emergency closures that may apply to the RC860 registration permit, providing predictable season dates for successful applicants.

When the quota is below 400, prohibit nonresident hunting in all zones.

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

The Fortymile Caribou Herd has continued to decline in recent years, resulting in substantial reductions to the fall RC860 harvest allocation. From 2021 to 2025, the quota decreased from 4,500 to 395, with an average annual reduction of roughly 31%. Throughout this period, the quota was divided among Zones 1, 2, 3, and 4 to distribute hunting pressure and opportunity across the herd's range.

From 2021 through 2024, resident hunters accounted for 75% of the total harvest, with nonresidents accounting for 25%.

In RY2025, this pattern shifted. During the state season, resident harvest fell to 35% while nonresident harvest rose to 65% of the total harvest. In Zone 2, nonresidents represented roughly half of the hunter effort yet accounted for 70% of the harvest. The zone closed early after reaching its quota in early September. Meanwhile, low zone quotas, large caribou concentrations near the Steese Highway, and high harvest during the federal season prevented Zones 1 and 4 from opening to state hunters without exceeding allowable harvest. Zone 3 remained open for the full season but yielded only single digit harvest despite receiving 56% of all hunter effort.

Across all zones over the past five years, nonresidents have averaged only about 17% of the total annual hunter effort and have consistently taken roughly 22% of the annual fall quota. Under low quotas, however, this distribution becomes increasingly consequential. Reduced allocations, short seasons, limited access, and zone closures disproportionately affect resident hunters who depend heavily on road-based opportunities. If the harvestable surplus continues to decline, maintaining reasonable resident opportunity within a registration permit system will require revising when and where nonresident hunting is allowed and restructuring permit approaches to better align harvest opportunity and distribution with available quotas.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-199)

Proposal 131

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

In the RC 860 hunt eliminate nonresident hunting opportunity, except nonresident military, in Zones 1, 3, and 4 and shorten the nonresident season in Zone 2 as follows:

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

At this time, with the FCH in such a steep decline, we propose to eliminate nonresident hunting opportunity (except nonresident military) in Zones 1, 3, and 4 for the RC 860 hunt until such time as the herd increases and is stable. We also propose shortening the nonresident season in Zone 2 as follows:

RC 860 Nonresident (*nonresident military hunters are exempt*)

Zones 1, 3, & 4 – No Open Season

Zone 2 Aug 10 – Sept 5

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

Decline of Fortymile Caribou Herd + Unlimited Nonresident Opportunity

The Fortymile Caribou Herd (FCH) has declined to about 26,000 animals, well under the Intensive Management (IM) population objective of 50,000 – 70,000 animals. We are not close to meeting the IM harvest objective of 1,000 animals.

In 2025, nonresident caribou hunters harvested 40% of the total harvest from the FCH during the fall RC 860 hunt. Most all of those nonresidents are not nonresident military. (*charts courtesy ADF&G*).

RC860 Harvest by Residency									
Regulatory Year	Total Harvest	Total Resident Harvest (% of total harvest)		Total Resident - Single Harvest per Hunter (% of total Harvest)		% Resident Success Rate - Single Harvest per Hunter	Total Nonresident Harvest (% of total harvest)		% Nonresident Success Rate
2021	2581	2142	(83)	2127	(82)	(37)	439	(17)	(42)
2022	795	587	(74)	585	(74)	(15)	208	(26)	(27)
2023	834	649	(78)	642	(77)	(25)	185	(22)	(37)
2024	350	240	(69)	240	(69)	(13)	110	(31)	(34)
2025	213	128	(60)	106	(50)	(15)	85	(40)	(42)

In Zone 2, the season was closed 25 days early in 2025 due to the high number of nonresident fly-in hunters harvesting caribou. The Zone 2 quota was 100 bulls and the harvest was 121 bulls. Zone 2 is the primary area where air-taxis/transporters fly their nonresident clients. These air-taxis and transporters typically book clients well ahead of that year's hunt and may book clients throughout the Aug 10 – Sept 30 season. So, when the season closes early, the clients booked to hunt after the closure aren't allowed to hunt and trips must be canceled, which is hard on all involved.

~68% of the caribou harvest in Zone 2 in 2025 was from nonresident hunters. The only nonresident harvest in 2025 was from Zone 2, which was an outlier compared to other years. Zones 1 & 4 did not open in 2025 as scheduled due to abundant caribou near the highway and there were few caribou in Zone 3.

RC860 Harvests by Residency												
Regulatory Year	Zone 1			Zone 2			Zone 3			Zone 4		
	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total
2021	1822	240	2062	74	143	217	208	45	253	38	11	49
2022	196	50	246	51	85	136	339	73	412	1	0	1
2023	604	105	709	38	77	115	6	2	8	1	1	2
2024	173	30	203	44	73	117	5	0	5	18	7	25
2025	79	0	79	36	85	121	6	0	6	7	0	7

As you can see from the chart below, nonresidents (both nonresident military and non-military) do hunt along the road system when the zones are open and caribou are available.

RC860 Hunters by Residency												
Regulatory Year	Zone 1			Zone 2			Zone 3			Zone 4		
	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total	Resident	Nonresident	Total
2021	4024	575	4599	184	198	382	1496	248	1744	106	24	130
2022	2288	385	2673	209	161	370	1423	221	1644	95	12	107
2023	1681	224	1905	156	152	308	661	115	776	29	8	37
2024	1080	139	1219	168	114	282	580	53	633	75	10	85
2025	127	2	129	139	128	267	440	70	510	10	1	11

During the last cycle, RHAK submitted a proposal to prohibit nonresident hunters from participating in the RC 860 fall hunt in Zones 1, 3, and 4. After discussions with air-

taxis/transporters we agreed to leave Zone 2 open to nonresident hunters. The board voted down our proposal saying that they did not want to prevent nonresident military hunters from participating in the RC 860 hunt along the road system. We tried to amend our proposal to exempt nonresident military hunters but there was confusion as to whether Alaska Wildlife Troopers could tell if a nonresident was military or not.

As we found out, while the RC 860 permit does not identify a nonresident vs a nonresident military hunter, the actual hunting license does identify whether a nonresident is military or not. So, Troopers can easily tell if a nonresident hunter is a nonresident military hunter.

Number of Nonresident Military Licenses Sold

In 2025, 614 nonresident military hunting licenses were sold, and 1, 327 nonresident military combo Hunt/Sport Fish licenses were sold. For the five years 2021 – 2025 the range of nonresident military hunt licenses sold was 560 - 625, and the range of nonresident military combo Hunt/Sport Fish licenses sold during that same time period was 1,327 – 1,560 (data from ADF&G License Statistics). We included this data for the board's information but have no way of knowing how many nonresident military hunters participate in the RC 860 caribou hunt.

Nonresident Military License

Below is a blank copy of a hunt/fish/trap license (front page). The arrows on the right point down to the nonresident military hunt or nonresident military hunt/sport fish boxes, one of which would be checked if that hunter was nonresident military.

STATE OF ALASKA SPORT FISHING, HUNTING, TRAPPING LICENSE										ANNUAL LICENSES EXPIRE DEC 31, AA 2026	
RESIDENT Requires Affidavit 11-524											
RES CLASS 01 \$20 Sport Fish	RES CLASS 02 \$45 Hunt	RES CLASS 3A \$65 Hunt/Trap	RES CLASS 3B \$25 Trap	RES CLASS 04 \$60 Hunt/Sport Fish	RES CLASS 05 \$85 Hunt/Trap/ Sport Fish	BLIND RES. CLASS 1A \$0.50 Sport Fish	BLIND RES. CLASS 2A \$45 Hunting				
REQUIRED FOR RESIDENT LICENSES When did your Alaska residency begin? Year _____ Month _____		License is not valid if more than one class is indicated. RES= Resident NR= Nonresident						RESIDENT TRAPPING LICENSES EXPIRE SEP 30, 2027. CLASS 6A, 6B, 6C, 6D and 9C valid for specified period only.			
INFORMATION REQUIRED - PLEASE PRINT CLEARLY FIRST _____ MI _____ LAST _____ GENDER _____ BIRTHDATE (MM.DD.YYYY) _____ ADDRESS _____ CITY _____ STATE/PROVINCE _____ ZIP/POSTAL CODE _____ COUNTRY _____ DRIVER'S LICENSE OR ID _____ PHONE _____ EMAIL _____ State _____ Number _____											
VENDOR COMPLETES THIS SECTION FOR ALL LICENSES ISSUED. VENDOR NUMBER _____ CLASS ISSUED _____ DATE ISSUED (MM.DD.YYYY) _____ I have read and understand the definition of Alaska "resident" (AS 16.05.415). My license has not been suspended or revoked in any state. This information is subject to public disclosure. Making false statements herein is subject to criminal penalties (AS 11.56.210, AS 16.05.420, & AS 16.05.665). I certify all the information is true and correct.											
X VENDOR SIGNATURE License not valid unless signed by both Licensee and Vendor.						X LICENSEE SIGNATURE					
NONRESIDENT START DATE AND END DATE FOR CLASSES 6A, 6B, 6C, 6D and 9C ONLY. START DATE _____ HOUR _____ AM _____ PM _____ END DATE _____ HOUR _____ AM _____ PM _____											
NR CLASS 6A 14-DAY \$75 Sport Fish	NR CLASS 6B 3-DAY \$30 Sport Fish	NR CLASS 6C 1-DAY \$15 Sport Fish	NR CLASS 6D 7-DAY \$45 Sport Fish	NR CLASS 9C \$205 Annual Hunt/ 7-Day Sport Fish	NR CLASS 07 \$100 Sport Fish	NR CLASS 08 \$45 Hunt	NR CLASS 8A \$60 Small Game				
NR CLASS 09 \$260 Hunt/ Sport Fish	NR CLASS 10 \$405 Hunt/Trap	NR ALIEN CLASS 15 \$630 Hunt	COMPLETE AFFIDAVIT ON BACK OF DEPARTMENT COPY BEFORE ISSUANCE OF THESE LICENSES CLASS 18 Original License Class \$5 Duplicate License RES CLASS 5A \$5 Low Income Hunt/Trap/ Sport Fish RES CLASS 5B \$2 Duplicate class 5A Low Income Sport Fish NR YUKON CLASS 11 \$20 Sport Fish NR MILITARY CLASS 12 \$20 Sport Fish NR MILITARY CLASS 16 \$45 Hunt NR MILITARY CLASS 17 \$60 Hunt/Sport Fish								

Alaska Department of Fish and Game, Licensing, PO Box 115525, Juneau AK 99811-5525 (907)465-2376

DEPARTMENT COPY

PRESS DOWN FOR CLEAR COPIES

On the back of the license there is a section in the bottom right that one fills out under penalty of perjury in order to receive a nonresident military license at a reduced cost.

AFFIDAVIT SUPPORTING LICENSE APPLICATION Complete the appropriate section and sign below.

RESIDENT LOW INCOME - Class 5A I am entitled to the Resident Hunting, Sport Fishing and Trapping License for a fee of \$5.00 for the following reason: ☐ I am the head of a family, or a dependant of a family; or ☐ I am solely dependent on myself for support. AND My family/household annual income for the preceding year is equal to or less than the poverty guidelines for Alaska set by the U.S. Department of Health and Human Services. AS 16.05.340(a)(6) Low-Income (Poverty) Guidelines may be found at the following web-site: https://aspe.hhs.gov/poverty-guidelines By signing this affidavit and purchasing a Resident Low Income (Class 5A) License I authorize the release of information by the Division of Public Assistance to the Department of Fish and Game necessary to verify my participation in any need-based program which qualifies me for this special category license and to the Department of Public Safety as necessary to investigate false claims for this license. A family's gross annual income must include all sources of income for ALL family members including permanent fund dividends, as well as any other dividends or interest payments received. A person must provide proof of eligibility under this paragraph when requested by the Department of Fish and Game or the Department of Public Safety. SURCHARGE DISCLOSURES (per AS16.05.340) HUNTING: A Wildlife Intensive Management Surcharge has been applied to all hunting licenses; Resident Hunting Licenses: \$10, Nonresident Hunting Licenses: \$30. NOTE: Making a false statement, or omitting a material fact, is subject to a maximum penalty of \$25,000 and/or 1 year imprisonment under AS 11.56.210 and 16.05.420, 665. Alaska Department of Fish and Game, Licensing, PO Box 115525, Juneau AK 99811-5525 (907)465-2376	DUPLICATE LICENSE - Classes 18 and 5B I hereby report the loss of my current Sport License issued to me in accordance with the Department of Fish and Game statutes and regulations as indicated below: <table border="1"><tr><td>License Class (REQUIRED)</td><td>License Number (if known)</td><td>Date of Issuance</td></tr><tr><td colspan="2">Issued By (Name of License Vendor)</td><td>Place of Issuance</td></tr></table> NONRESIDENT YUKON RECIPROCAL SPORT FISHING LICENSE - Class 11 <table border="1"><tr><td>Yukon Resident Sport Fishing License Number</td><td>Yukon Government Issued ID. Number</td></tr></table> NONRESIDENT MILITARY - Classes 12, 16 and 17 (Must be stationed in Alaska) I am entitled to the special nonresident Military License for the following reason: ☐ I am a member of the military service on active duty permanently stationed in Alaska; or ☐ I am a dependant of a member of the military service on active duty permanently stationed in Alaska. <table border="1"><tr><td>Branch of Military Service</td><td>Rank and I.D. Number</td></tr><tr><td>Assigned Duty Station</td><td>If a dependant, what is relationship?</td></tr></table> NOTE: Please read definition of resident to determine residency status. I hereby certify under penalty of perjury that all the above information is true and correct. <table border="1"><tr><td>X LICENSEE SIGNATURE</td><td>DATE</td></tr></table>	License Class (REQUIRED)	License Number (if known)	Date of Issuance	Issued By (Name of License Vendor)		Place of Issuance	Yukon Resident Sport Fishing License Number	Yukon Government Issued ID. Number	Branch of Military Service	Rank and I.D. Number	Assigned Duty Station	If a dependant, what is relationship?	X LICENSEE SIGNATURE	DATE
License Class (REQUIRED)	License Number (if known)	Date of Issuance													
Issued By (Name of License Vendor)		Place of Issuance													
Yukon Resident Sport Fishing License Number	Yukon Government Issued ID. Number														
Branch of Military Service	Rank and I.D. Number														
Assigned Duty Station	If a dependant, what is relationship?														
X LICENSEE SIGNATURE	DATE														

It is possible for troopers to distinguish between a nonresident hunter and a nonresident military hunter. A regulation that only allows nonresident military hunters is enforceable.

With the FCH in such a steep decline, we don't believe there should be any non-military nonresident hunting at all, however, we recognize that the fly-in portion of Zone 2 is important to air-taxis and transporters who cater to nonresident hunters and we'd like to provide some nonresident opportunity in Zone 2, albeit with a shorter season. With the decline of the herd and reduced quotas, we believe a shorter nonresident season in Zone 2 is best for everyone. That ensures there is some opportunity without the likelihood of going over the quota and the season closing early.

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

Thank you to Department staff for providing the data and information!

PROPOSED BY: Resident Hunters of Alaska (OI-F26-090)

Proposal 132

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

40 mile caribou herd Restrict Non-resident hunting in Zone 2 RC 860 Non-resident (except Non-resident Military) as follows:

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

Restrict Non-resident hunting in Zone 2

RC 860 Non-resident (except Non-resident Military) All Zones No Open Season.

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

The Fortymile Caribou hunt is a very popular hunt for the Alaskan Resident. With the severe herd decline from over 60,000 to 26,000 animals, the harvestable surplus has been reduced to less than 400.

The non-resident harvest for this herd is over 25% in Zones 1, 3 and 4. Zone 2 non-resident harvest is about 70% of the allowable 100 animal quota.

The unpredictable dates and short openings because of large concentration of animals in Zones 1, 3, & 4, and the closing of other caribou hunts have put pressure on Zone 2 by non-residents, where the season is open from Aug. 10th to Sept 30th. It is also easily accessible and targeted by commercial transporters. Zone 2 is a mainstay for the residents of the Salcha, Chena, and Goodpaster drainages, plus many other resident hunters.

Nonresident hunting in Zone 2 has reduced the resident opportunity by early closure dates for this hunt.

Because of the popularity of this hunt with residents and the low quota, this hunt should be for residents and severely restricted for non-residents in Zone 2.

Some other options other than a nonresident closure could be:

1. Non-resident with a guide only.
2. Reduced dates for Non-residents Aug.10th to Aug. 25th.
3. Have a Non-resident draw hunt, limiting the available number of tags based on quota.
4. Allow Non-resident military to hunt.

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

I have talked to resident hunters that Hunt Zone 2 and members of the Salcha River Property Owners along with gathering information from ADF&G.

PROPOSED BY: Kenneth Armstrong (OI-F26-111)

Proposal 133

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

40 mile caribou hunt be restricted to residents only and made into a tier two hunt as follows:

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

40 mile caribou

With the current size of 40 mile Caribou herd offering greatly reduced hunting opportunities. The previous very liberal harvest opportunities no-longer exist. Nonresident hunters should be excluded from hunting this herd till numbers recover enough to exceed the resident hunter demand. There simply is not enough population available to offer these animals to nonresidents currently. Or conversely offer this as a tier two hunt for those who historically have hunted this herd till numbers recover enough to allow a general harvest again.

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

40 Mile Caribou,

Herd size decline limiting hunting opportunity.

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

I propose the 40 mile hunt be restricted to residents only and be made a tier two hunt.

PROPOSED BY: Thomas Ranchoff

(OI-F26-044)

Proposal 134

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

Establish a resident only draw hunt for the fall RC 860 hunt whenever the herd population estimates are at or below roughly 28,000 as follows:

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

Establish a draw hunt for the fall RC 860 hunt whenever the herd population estimates are at or below roughly 28,000. This hunt would be resident only hunt and only available in zones one and four proposal. The up to number for the draw should be proportional to what the quota for that zone would have been. switching to a draw hunt when herd numbers are low allows fir a predictable harvest in a bull only hunt and prevents the possibility of over harvest that are a registration hunt could allow.

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

The current 40 mile herd manager has been extremely conservative over the past few years, even when there is a harvestable surplus of animals available, and as such as restricted hunting opportunity even to the point of not allowing a fall hunt. Finding an alternate means for opportunity needs to be explored so that hunters can still participate while allowing room for herd growth.

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

As a member of the Fairbanks AC, we have discussed this topic multiple times, but I chose to make this proposal on my own.

PROPOSED BY: Eric Anslinger (OI-F26-123)

Proposal 135

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

Adjust the season opener of the forty mile RC860 hunt to Aug 5th as follows:

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

New hunt codes would be as follows

RC860 season dates Aug 5-Sept 30 (or until the quota is met)

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

Adjust the season opener of the forty mile RC860 hunt to Aug 5th. State managers should not be deferring to federal managers by allowing federal harvest before state allocation. That would be in conflict of article 8 of the state constitution and falls out of line from section E of the statehood act where the state was given sole management of its wildlife by the same federal government. I would encourage managers to support all Alaskan's opportunities.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-167)

Proposal 136

5 AAC 85.025; 92.050. Hunting seasons and bag limits for caribou; Required permit hunt conditions and procedures.

Amend the YC831 draw hunt to add Fortymile caribou hunt zones 2 and 4 to the hunt area and extend the closure date to September 30 as follows:

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

This proposal would amend the YC831 draw hunt to add Fortymile caribou hunt zones 2 and 4 to the hunt area and extend the closure date to September 30.

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

The YC831 Fortymile caribou youth draw hunt is unnecessarily restrictive. It is intended to provide early-season opportunity and encourage youth participation in caribou hunting. The current August 1 - August 21 season occurs only in Zones 1 and 3. Over the past five years, the hunt has seen high hunter participation but, because caribou distribution varies widely from year to year, harvest success has fluctuated significantly, ranging from 23% to 88%.

Restricting the hunt to only two zones limits opportunity when the herd is not present in those areas. Allowing youth to hunt in all RC860 zones ensures access to whichever portion of the Fortymile range the herd may be present. Extending the season through September 30 would also increase the likelihood that youth hunters will encounter caribou. A longer season and a wider hunt area would provide greater flexibility for families, reduce reliance on unpredictable early August herd distribution, and support a more consistent and meaningful youth hunting experience.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-200)

Proposal 137

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

Limit the Non-Resident permit allocation for the Unit 20 Caribou drawing hunt YC831, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Caribou drawing hunt YC831, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Caribou drawing hunt YC831. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Caribou hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Barren Ground Caribou unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is a Youth Caribou hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-192)

Proposal 138

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

Amend the seasons dates of AC999 targeted to October 1- March 31 as follows:

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

Amend the seasons dates of the AC999 targeted. The regulation would read “1 caribou by targeted permit only, during a season that may be announced by emergency order within a portion of the area during October 1 – March 31 (Season to be announced by emergency order).”

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

Under current regulation, the Fortymile caribou targeted permit hunt, AC999 may only be implemented by emergency order between December 1 - March 31. This hunt is intended to

provide Alaska resident opportunity if the use of the Fortymile caribou winter registration hunt, RC867, presents a risk of exceeding the quota. The AC999 hunt is an important management tool used to alleviate overharvest risk when large numbers of caribou are near roadways or when other management concerns arise, while still allowing hunting opportunities for residents in specific zones. Those conditions are not date-related and could occur at any time during the winter season. Aligning the allowable use period for AC999 with the beginning date of the RC867 winter hunt, October 27, would enable managers to authorize limited hunting opportunities during a larger time frame in the winter instead of issuing full closures.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-197)

Proposal 139

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

Redefine the boundaries of Zones 1 and 4 to isolate the core remote section of the current Zone 4 as follows:

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

Redefine the boundaries of Zones 1 and 4 to isolate the core remote section of the current Zone 4. By constricting Zone 4 to more remote areas of the Beaver Creek and Victoria Creek drainages, managers gain the flexibility to leave this zone open even when road-accessible quotas in Zone 1 are met or risk of overharvest exists. Given relatively low hunter effort and harvest rates, this proposal is unlikely to impact the sustainability of the herd, while providing significantly more predictable seasons and improved opportunities for remote hunters.

Additionally, this adjustment aligns the zone boundaries with the universal coding units used for departmental harvest reporting. This administrative alignment will improve the accuracy of harvest data and streamline the reporting process for both hunters and department staff.

Altered zone descriptions would read as follows:

Zone 1:

Unit 20B, that portion within the Chatanika River drainage north and east of the Steese Highway, those portions north and west of the Steese Highway, those portions north and east of the Elliot

Highway and that portion south and east of the Steese Highway, excluding the Middle Fork of the Chena River drainage upstream from and including the Teuchet Creek drainage and excluding the Salcha River drainage.

Unit 20F, those portions north and west of the Steese Highway, north and east of the Elliot Highway to its intersection with the Dalton Highway, then east of the Dalton Highway and south of the Yukon River, excluding the Chatanika River drainage.

Unit 25C, excluding that portion within the drainage of the South Fork of Birch Creek, excluding that portion within the Yukon–Charley Rivers National Preserve, and excluding that portion of 25C within the Beaver Creek and Victoria Creek drainages between and including the Moose Creek drainage and Fossil Creek drainage.

Zone 4:

Unit 25C, that portion within the Beaver Creek and Victoria Creek drainages, between and including the Moose Creek drainage and Fossil Creek drainage.

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

The Fortymile Caribou Herd has declined in recent years, resulting in reduced harvest allocations. As these limits become more restrictive, precise management is required to provide adequate hunting opportunity without overshooting established quotas. The current shared quota between Zone 1 and Zone 4 creates an avoidable management challenge and unnecessarily limits opportunity in remote areas. Zone 1 includes the Steese Highway corridor, where caribou can be highly accessible. As a result, harvest can increase quickly, raising the risk of exceeding the quota. To prevent this, managers often close both Zone 1 and Zone 4 at the same time because they are linked under the Fortymile Caribou Herd Harvest Plan. However, Zone 4 differs significantly from Zone 1; it is a remote area with limited access, strict vehicle restrictions, and low hunting pressure. Over the past five seasons, Zone 4 has accounted for an average of about 2% of total hunting effort and 1.8% of the harvest. Under the current hunt structure, hunters seeking a remote experience in Zone 4 may be affected by closures driven by high harvest levels or caribou presence along the road system in Zone 1. This reduces opportunity across the northern portion of the hunt area, even though harvest in Zone 4 poses little risk to the total harvest cap.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Management Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-201)

Proposal 140

5 AAC 92.011. Taking of game by proxy.

Prohibit proxy hunting in Units 20B, 20D, 20E, 20F, and 25C for caribou under the Fortymile registration hunts as follows:

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

Proxy hunting in Units 20B, 20D, 20E, 20F and 25C for caribou under the Fortymile registration hunts RC860 and RC867 should be prohibited.

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

Proxy hunting is currently allowed for the RC860 and RC867 caribou registration hunts in Units 20B, 20D, 20E, 20F, and 25C. The Fortymile caribou herd has been declining for several years and is now below its intensive management population and harvest objectives. As a result, harvest quotas have been reduced and allocated across zones. These low and zone distributed quotas mean that every individual harvest has a proportionally greater effect on achieving management goals and maintaining harvest distribution across the hunt area. During periods of reduced availability, allowing proxy hunting can unintentionally concentrate harvest among a smaller number of households and limit

overall hunter participation. Eliminating proxy hunting will help ensure that limited harvest opportunity is more evenly distributed among residents across all zones.

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

This proposal was developed by the Fortymile Caribou Herd Harvest Coalition, which includes representatives from Advisory Committees (Fortymile-Upper Tanana, Central, Fairbanks, Eagle, Delta, Anchorage, and Matanuska Valley) who represent hunters who have traditionally hunted the FCH. Development of the proposal also included consultation with state and federal agencies and other resource agencies. This proposal is part of an updated Fortymile Caribou Harvest Plan, which will be submitted to the Board.

PROPOSED BY: Fortymile Caribou Herd Harvest Management Coalition (OI-F26-198)

Proposal 141

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

Close the August 24-28 seasons for Moose hunting in unit 20E as follows:

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

Close the August 24-28 seasons in unit 20E.

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

A large decline in Moose numbers, corresponding decrease in harvest and an increase in hunting pressure.

In the last five years we have lost 50 percent of the Moose in 20E. Bull cow ratios have dropped significantly since 2006.

There is currently a predator control program in 20E due to the low numbers of Moose.

Back in the early 2000s this committee submitted a proposal to put the August 24-28 seasons in place, the board of game passed it and the first August 24-28 season was opened in 2006. At the time Moose numbers were trending up and the committee's goal was to provide additional hunting opportunity that would largely be utilized by residents of 12 and 20E. Initially it was very successful. In 2006 twelve Moose were taken seven of them by local hunters.

Things have changed over the last 20 years, in 2025 six moose were taken in the August season with zero by local hunters. Overall hunter numbers have increased dramatically with a decrease in local hunters. The August season in today's world tends to exasperate this issue. Hunters are coming from far and wide in the August season, they are hunting, setting up large camps and leaving them set up thereby "Claiming a hunting area". They in many cases leave and then return when the September season opens. This is serving to displace local hunters.

Another problem with the August season is meat care, some years the temperatures in this area can be in the 70s and low 80s. Taking proper care of the meat especially if you are a long way from home can be nearly impossible. The trail systems have vastly expanded and the distance people are going off of the Taylor highway on these trails has increased significantly, Increasing travel time. There are no commercial processing facility's available in the local area.

We believe this is a conservation, allocation and a meat care issue at this point.

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

This proposal was developed and submitted by the Upper Tanana 40-Mile Advisory committee with information being supplied by ADFG in Tok at our request.

PROPOSED BY: Upper Tanana/Fortymile Fish & Game Advisory Committee (OI-F26-193)

Proposal 142

5 AAC 99.025. Permit for exporting a raw skin.

Determine customary and traditional use of Dall sheep in Unit 12 and Unit 20, for that portion outside of the Tok Management Area and the Delta Management Area as follows:

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

5 AAC 99.025. Customary and traditional uses of game populations.

Determine customary and traditional use of Dall sheep in Unit 12 and Unit 20, for that portion outside of the Tok Management Area and the Delta Management Area.

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

During the 2024 Region 3 Board of Game (board) meeting in Fairbanks, the board considered proposals that increased opportunity for sheep hunting in Unit 12 and Unit 20, that portion outside of the Tok Management Area and the Delta Management Area, for residents and nonresidents. However, the board has not yet made a customary and traditional use finding for sheep in this area. Because this area is outside a nonsubsistence area, 5AAC 99.010(b) requires the board identify game populations, or portions thereof, that are customarily and traditionally taken or used by Alaska residents for subsistence uses by considering the eight criteria found at 5AAC 99.010(b)(1-8).

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-036)

Proposal 143

5 AAC 92.1XX. New Regulation.

Implement an intensive management predator control plan within the Tok Management Area to benefit Dall Sheep as follows:

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

Implement an intensive management predator control plan within the Tok Management Area to benefit Dall Sheep as follows:

Implement an intensive management predator control plan within the Tok Management Area (TMA) via aerial coyote and wolf control. Aerial coyote and wolf shooting would be allowed via private fixed wing aircraft and retrieval of coyotes and wolves would be allowed via private rotorcraft or fixed wing aircraft. In addition, the Department could remove coyotes and wolves using helicopters if necessary to supplement private efforts to meet removal objectives.

Our goal for predator control is to help the sheep population recover to historic averages more quickly than if intervention did not occur. We propose predator control be conducted until the

sheep population recovers to the long-term (2006-2019) averages. Alternatively, we propose the predator control cease following five years if there are no signs that the control is positively impacting population growth.

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

The Tok Management Area (TMA) Sheep population, like many sheep populations throughout Alaska, is currently at a historic low. The total number of sheep observed by the department during their 2025 survey with the TMA survey area was 261, which is 77% fewer than the 2006-2019 (pre-crash) average of 1145 sheep. Furthermore, the number of sheep observed in 2025 was 69% fewer than the previous low number of sheep observed in 2024 (n=835), which followed the very late spring in 2013. The current population decline has resulted in a historic low number of draw sheep permits awarded during fall 2022, 2023, 2024 and 2025. Prior to these years, the lowest number of permits awarded was 60, while only ten permits have been issued annually since 2022.

Although we recognize that weather is likely the primary contributing factor to the current decline, predation is likely an additional contributing factor. According to the department sheep research conducted in Unit 20A during the early 2000s, coyotes are one of the primary predators of lambs, while wolf predation also occurs at a lower level. We believe managing predation could help the TMA sheep population recover.

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

Yes, this proposal was developed by the Upper Tanana Fortymile Fish & Game Advisory Committee

PROPOSED BY: Upper Tanana/Fortymile Fish & Game Advisory Committee (OI-F26-196)

Proposal 144

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit the Non-Resident permit allocation for the Unit 20 Sheep drawing hunt DS206, to “Up To” 20% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Sheep drawing hunt DS206, to “Up To” 20% of the available permits. If at least 5 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Sheep drawing hunt DS206.
There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Dall Sheep hunting in Alaska is the only state in the Union that has opportunity to hunt Dall Sheep, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-178)

Proposal 145

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

For Dall Sheep hunting in the Glacier Mountain Controlled Use Area remove non resident opportunity and reduce resident opportunity as follows:

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

Sheep Unit 20E

Glacier Mountain Controlled Use Area

Resident: One ram with full-curl horn or larger by draw permit only DS XXX Aug 10 – Sept 20 (up to 5 permits)

Nonresident: No Open Season

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

**Nonresident Sheep Hunting Opportunity in Glacier Mountain Controlled Use Area (GMCUA)
Resident Sheep Hunting Opportunity in GMCUA**

Sheep hunting opportunity in the GMCUA has been closed since 2024 From the Department's announcement:

(Tok, Alaska) – All sheep seasons within the Glacier Controlled Use Area, in a portion of Unit 20E, will be closed for the 2026 season, to address public concerns for sheep in this area. This closure will only impact the 2026 season.

“The GMCUA was created in 1971 to provide greater protection for sheep that used the Glacier Mountain area. Sheep within the GMCUA are part of the larger Tanana Hills sheep population, which exists in marginal, non-contiguous sheep habitat over an expansive area of eastern interior Alaska.

The GMCUA contains a small segment of the Upper Tanana Dall sheep population. Harsh winters in 2020 and 2021 corresponded with a steep decline in sheep populations statewide. Few sheep have been observed in the GMCUA since 2019, and no legal rams have been observed or harvested in the area since 2021.

Although the full-curl harvest strategy is an extremely conservative approach to hunting management, there are times when more conservative strategies are warranted to address public concerns.

Consequently, the GMCUA was initially closed for the 2024 sheep season and will be closed again for the 2026 season.”

When/if sheep hunting opportunity is again allowed in the GMCUA, there should be no nonresident sheep hunting opportunity allowed. Small, isolated sheep populations like this one in the Yukon-Tanana uplands are of concern and should be reserved for resident sheep hunting only when sheep hunting is allowed.

Any resident sheep hunting opportunity (should this area open again) should be by draw permit only with a limited number of tags.

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-092)

Proposal 146

5 AAC 92.010(l); 92.165(a). Harvest tickets and reports; Sealing of bear skins and skulls.

Remove the requirement for hunters to possess a black bear harvest ticket prior to hunting black bears in Units 12 and 20E, and require all black bears taken in Units 12 and 20E to be sealed as follows:

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

5 AAC 92.010(l)

For black bear, a person may not hunt black bear in Units 1-7, 11, 13-16, [AND] 20(A), 20(B), 20(C), 20(D), and 20(F) , except when a permit is required, unless the person has in possession a harvest ticket for the species and has obtained a harvest report (issued with the harvest ticket).

5 AAC 92.165(a)

Sealing is required for hides and skulls of brown bear taken in any unit in the state, hides and skulls of black and brown bear taken in any unit in the state before the hide or skull is sold, hides and skulls of black bear of any color variation taken from January 1 through May 31, and skulls of black bear of any color variation taken from June 1 through December 31 in Units 1-7, 12, 14(A),

14(C), 15-7, [AND] 20(B), and 20(E). The seal must remain on the skin until the tanning process has commenced. A person may not possess or transport the untanned skin or skull of a bear taken in a unit where sealing is required, or export from the state the untanned skin or skull of a bear taken anywhere in the state, unless the skin or the skull, or both as required in this section have been sealed by a department representative within 30 days after the taking, or a lesser time if requested by the department...

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

Harvest ticket requirements for black bear were adopted by the Board of Game in the late 2000s with the intent of improving effort data in areas experiencing high hunting pressure. However, many hunters harvest black bears incidentally while targeting other species or opportunistically while in the field. As a result, reported days hunted may be biased or mischaracterized. In addition, hunters may pursue black bears in this incidental manner across multiple game management units, which cannot be effectively captured under the current reporting framework.

Black bear populations are not currently monitored in Units 12 and 20E, as survey and inventory methods have proven inefficient and costly relative to the level of harvest and hunting pressure. Harvest levels in these units are estimated to be sustainable for Units 12 and 20E, with a combined annual harvest of 49–72 bears (total = 326) recorded between regulatory year (RY) 20 and RY24. During this same period, only 66 bears were sealed, likely to meet export requirements. Currently, success and effort data are not needed to manage black bear populations in Units 12 and 20E.

Implementing mandatory sealing and removing harvest ticket requirements could provide a more reliable method for documenting harvest trends and facilitate collection of additional geographic and biological data. Sealing also creates opportunities for premolar aging and tissue collection by the department, which may yield more meaningful population indices than effort, success, or harvest data alone, while also reducing reporting requirements for hunters. This change would not require any modification to the salvage requirement regulations because all areas with mandatory sealing are already addressed under 5 AAC 92.220(a)(3), which specifies salvage requirements for black bears taken in units where sealing is required. However, the change will alter the salvage requirements for black bears taken in Units 12 and 20E because salvage requirements are tied to sealing requirements. Currently, salvage requirements for black bears taken in Units 12 and 20E requires only the edible meat be salvaged if taken between January 1 and May 31, and either the edible meat or the hide must be salvaged if taken between June 1 and December 31. By requiring sealing, hunters that harvest a black bear in Units 12 and 20E will be required to salvage the edible meat, the hide, and the skull of black bears taken between January 1 and May 31, and either the skull and the edible meat or the skull and the hide of black bears taken between June 1 and December 31.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-024)

Proposal 147

5 AAC 84.270. Furbearer trapping.

Lengthen muskrat trapping season 5 days to start on Sept 15th as follows:

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

Lengthen muskrat trapping season in Units 12 and 20E as follows:

SEPT 15 [Sept 20] through Jun 10

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

Lengthen muskrat trapping season 5 days to start on Sept 15th. That aligns the season with current beaver trapping season and muskrat season in the rest of Unit 20.

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

This proposal was developed by the Upper Tanana Fortymile Fish & Game Advisory Committee

PROPOSED BY: Upper Tanana/Fortymile Fish & Game Advisory Committee

(OI-F26-194)

Delta Junction Area - Units 20D

Proposal 148

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM790, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM790, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM790.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-195)

Proposal 149

5 AAC 85.010. Hunting seasons and bag limits for bison.

Limit the Non-Resident permit allocation for the Unit 20 Bison drawing hunt DI403/404, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Bison drawing hunt DI403/404, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Bison drawing hunt DI403/404.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Free Range Bison hunting in Alaska is one of only 6 states that have genetically pure Bison, making it a highly desirable opportunity. Meat value of a Bison is high and obtaining Bison permits is difficult. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. This is a particularly easy and affordable area to access off the road system and provides an affordable opportunity to local Alaskans to harvest a Bison.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-171)

Proposal 150

5 AAC 92.XXX. New Regulation

Establish IM area in 20D for Moose recovery as follows:

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

“The Intensive Management area shall consist of that portion of Game Management Unit 20D north of the Tanana River. The department may implement predator control measures, including aerial control and public permit programs, to reduce predator densities to levels to allow the moose population to return to historic densities.”

Objective:

We recommend using moose density thresholds to determine when to turn predator control on and off, and when to harvest cows, to maintain the moose population near historic density of ~ 1.3 moose/sq mile in 20D north. Reduce wolf densities to 5–10 wolves per 1,000 square miles to improve moose calf survival and population growth.

Control Area: All lands within GMU 20D north of the Tanana River.

Methods:

- Public aerial control (Same-Day Airborne) under permit
- Use of aircraft, including helicopters, for access to place traps and snares
- Department aerial removal using helicopters if necessary

Strategy:

- Initial reduction phase to lower predator densities
- Maintenance phase through ongoing public and department efforts
- Monitoring:
 - Annual moose population surveys
 - Calf-to-cow ratios
 - Wolf population surveys (as available)
 - Hunter success rates

Management actions will be adjusted as needed based on observed results:

- Increased calf survival and recruitment
- Moose population growth toward objective levels
- Reversal of current population decline
- Increased hunter success and opportunity

In addition, as part of a holistic moose management program, we recommend ADF&G work with Forestry to outline limited suppression areas in northern 20D to allow Wildland fires to burn. Also to consider implementing prescribed fires and developing a program to crush or roller chop designated areas each year in road or trail accessible portions of this area to maintain moose habitat.

The moose population in GMU 20D North is declining despite adequate habitat conditions. Persistent low recruitment and high predator populations indicate a predator-limited system. Reestablishing an Intensive Management program is necessary to restore moose populations and provide for sustained human use in accordance with Alaska's sustained yield mandate.

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

We have concerns about being able to maintain moose numbers in 20D north. Moose survey data shows a downward trend in population density and persistently low recruitment. Calf-to-cow ratios are consistently below levels required for population growth (15:100 in 2019, 18:100 in 2021, and 16:100 in 2024). These values are well below the generally accepted threshold of 25 calves per 100 cows necessary for population stability or growth. This moose population declined ~ 40% following the severe weather event during the winter of 2021-2022. With low recruitment this population is at risk of further decline.

Historical evidence from the Upper Yukon–Tanana Predator Control Program (2005–2018) demonstrates that predator control can be effective in this region. Predator populations are abundant following cessation of predator control efforts in 2018. This combination of declining moose density, chronically low recruitment, and high predator abundance indicates that predation is a primary limiting factor in 20D north.

The habitat within GMU 20D North can support increased moose abundance. The 2004 Alaska wildfire season, the largest on record, burned over 6.6 million acres statewide and included extensive fires in the Upper Tanana region, including the Taylor Complex Fire, which burned over 1.3 million acres. As a result, large portions of GMU 20D North are within the 10–20 year post-fire stage, which provides optimal moose habitat. Regenerating vegetation such as willow, birch, and aspen provides abundant, high-quality forage. More recent wildfire activity has continued to create and maintain excellent habitat, resulting in a diverse mosaic of vegetation conditions across the landscape. Despite these favorable habitat conditions, moose populations have declined, demonstrating that habitat is not the limiting factor and supporting the conclusion that predation is the primary constraint on population growth.

Current moose densities in northern Unit 20D offer adequate hunter opportunity but are below the carrying capacity of the habitat. Rather than trying to continue to increase the population to a higher level closer to carrying capacity, we recommend ADF&G manage for a level of predator removal adequate to return this slow growing population to historic density levels. Without action, continued decline in the moose population may further reduce hunter success and lead to more restrictive harvest regulations. Predator control is needed in this area to aid in the recovery of the moose population to near or above historic levels, ensure calf:cows ratio support population growth as to avoid implementing moose harvest restrictions.

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

Yes this proposal came out of the Delta Junction Advisory Committee with assistance from ADFG Area Biologists in the Delta office.

PROPOSED BY: Delta Fish & Game Advisory Committee (OI-F26-152)

Proposal 151

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunting seasons in Unit 20D as follows:

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

(18) hunting seasons and bag limits for moose in Unit 20 are as follows:

...

Unit 20(D), that portion lying
west of the west bank of the
Johnson River and south of the
north bank of the Tanana

River, except the Delta Junction
Management Area and the
Bison Range Controlled Use Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime
of a hunter, by youth hunt
drawing permit only; up to 100
permits may be issued may be issued
in combination with those portion
in the Delta Junction Management
Area and the Bison Range Controlled
Use Area; a person may not take a
calf or a cow accompanied by a calf;

Sept. 16 – Sept. 25

(General hunt only)

1 antlerless moose by
registration permit only;
a person may not take a calf or
a cow accompanied by a calf

Oct. 10 - Nov. 25

(General hunt only)

...

Unit 20(D), that portion within
the Bison Range Controlled
Use Area

...

1 antlerless moose, per lifetime
of a hunter, by youth hunt
drawing permit only; up to 100

Sept. 16 – Sept. 25

(General hunt only)

permits may be issued in Unit 20(D)
lying west of the west bank of the
Johnson River and south of the
north bank of the Tanana
River and the Delta Junction
Management Area; a person may
not take a calf or a cow
accompanied by a calf;
Unit 20(D), that portion within
the Delta Junction Management Area

RESIDENT HUNTERS:

...

1 antlerless moose, per lifetime
of a hunter, by youth hunt
drawing permit only; up to 100
permits may be issued Unit 20(D)
lying west of the west bank of the
Johnson River and south of the
north bank of the Tanana
River and the Bison Range
Controlled Use Area; a per-
son may not take a calf or a
cow accompanied by a calf;

Sept. 16 – Sept. 25
(General hunt only)

1 moose every four regulatory
years by drawing permit
a person may not take a calf or
a cow accompanied by a calf; or

Sept. 1 - Sept. 15
(General hunt only)

...

1 antlerless moose by	Oct. 10 - Nov. 25
registration permit only;	(General hunt only)
a person may not take a calf or	
a cow accompanied by a calf	

NONRESIDENT HUNTERS:

1 moose every four regulatory	Sept. 1 - Sept. 15
years by drawing permit only,	
a person may not take a calf or	
a cow accompanied by a calf; or	

...

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

Antlerless moose hunts must be reauthorized annually by the Board of Game. The primary goals of the Unit 20D antlerless hunts are to regulate moose population growth at levels the habitat can support, provide harvest opportunity to make progress towards IM harvest objectives (500-700), and provide hunters with an additional opportunity to pursue moose without reducing bull-to-cow ratios. Antlerless moose hunts are offered in southern Unit 20D, which has the highest moose density in the unit. This area has potential for population growth due to an abundance of high-quality moose habitat created from extensive land clearing for agricultural use and multiple wildfires over the past 40 years.

The Unit 20D moose population is slightly below the IM population objective (8,000-10,000); however, nutritional indices suggest the population is at moderate nutritional levels. In November 2025, the Southern Unit 20D population estimate was 2,518 moose (90% confidence interval 2164-2873, moose; 1.61 moose per square mile). This estimate represents a slight decrease in moose abundance compared to the 2023 survey, which estimated 3,250 moose (2.08 moose/mi²). The 2022 population estimate was 40% lower than the 2020 estimate, likely due to increased mortality because of severe winter conditions during 2021–2022, which included deep snow and winter rain events. The two-year (2024 and 2025) average twinning rate is 19.5%. An increased twinning rate following the population reduction after the winter of 2021–2022 suggests improved nutritional condition of this moose population. A reduction in browse offtake from 41% in 2022 to 21% in 2023 in Unit 20D also supports a finding of lower browsing pressure on available forage. Furthermore, short-yearling weights collected in 2025 averaged 396 lbs, which is greater than the 385 lb threshold suggestive of low nutrition but less than the 410 lb threshold suggestive of high nutrition. Thus, similar to the multi-year twinning rate estimates, the short-yearling weights suggest the moose population nutrition is now at moderate levels. The goal is to manage

the Unit 20D moose population for stability, and antlerless harvest is an important component of this management strategy.

Continued antlerless harvest is needed to maintain this population at an optimal density relative to habitat constraints and will contribute additional harvest toward meeting the IM harvest objective without reducing bull-to-cow ratios. The current population trend suggests that low, consistent antlerless harvest provided by drawing permit hunts in Unit 20D is appropriate to maintain population stability. If antlerless moose hunts are not reauthorized, the moose population could increase to levels beyond what the ability of the habitat can support, opportunity to hunt a harvestable surplus of cow moose would be lost, and the ability to meet IM harvest objectives could be further compromised.

The department will continue to evaluate antlerless moose hunts and their effect on moose density and population growth. Future antlerless moose hunts will be implemented as needed based on the evaluation of the three indices of density-dependent moose nutritional conditions in relation to changes in moose density: biomass removal of current annual growth on winter browse, proportion of females with twin calves, and late-winter calf weights.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-016)

Proposal 152

5 AAC 84.270. Furbearer trapping.

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20D as follows:

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

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20D.

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

In 2022 the regulations were changed to allow the use of a firearm and bow and arrow to take beavers under a trapping license statewide. This method of beaver harvest was allowed from 2022 until 2026, when the board was made aware of a conflicting regulation. The board clarified the conflicting regulation by returning the regulations to pre-2022 language. There are no current conservation concerns for beaver. I would like the board to restore the use of a firearm and bow and arrow as a legal method and means to take beaver under a trapping license in Unit 20D.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-159)

Galena Area - Units 21B, 21C, 21D, & 24

Proposal 153

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

Add a hunt condition for RM834, DM816, DM817, and DM818 so that hunters who receive this permit are not allowed to use aircraft for hunting moose in this hunt area as follows:

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

We want to propose adding a hunt condition for RM834, DM816, DM817, and DM818 so that hunters who receive this permit are not allowed to use aircraft for hunting moose in this hunt area, including transportation of any moose hunters, their hunting gear, and/or moose parts. However, this prohibition does not apply to the transportation of moose hunters, their hunting gear, or parts of moose by aircraft between publicly owned airports, or the transportation into the area of game meat that has been processed for human consumption.

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

Use of aircraft in traditional hunting areas in the Kaiyuh flats are affecting subsistence hunting and land use patterns. Frequent air traffic is creating noise disturbance, low circling of wildlife and heavy airplane traffic over boats and camped hunters.

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

This proposal was developed by the Middle Yukon River Fish & Game Advisory Committee

PROPOSED BY: Middle Yukon River Fish & Game Advisory Committee (OI-F26-188)

Proposal 154

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

Split the season for DM816, DM817, DM818 so that half the draw permit hunters hunt from 9/05-9/15 and the other half hunt from 9/16-9/25 as follows:

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

We want to propose splitting the season for DM816, DM817, DM818 so that half the draw permit hunters hunt from 9/05- 9/15 and the other half hunt from 9/16-9/25. This would help to alleviate overcrowding from the middle to the end of the season.

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

Increasing number of moose hunters in the Kaiyuh area is impacting the traditional land use patterns for subsistence hunters and the quality of the hunt for all hunters.

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

This proposal was developed by the Middle Yukon River Fish & Game Advisory Committee

PROPOSED BY: Middle Yukon River Fish & Game Advisory Committee (OI-F26-189)

Proposal 155

5 AAC 92.540. Controlled Use Areas.

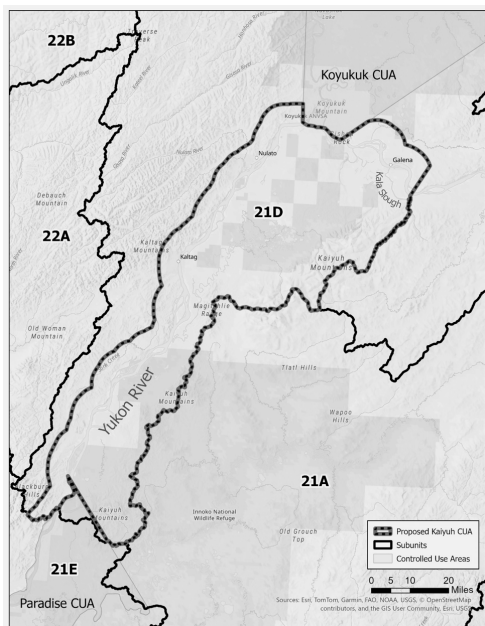
Establish a Controlled Use Area in the Kaiyuh Flats area in Unit 21D that encompasses the RM831 hunt area as follows:

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

Establish a Controlled Use Area in the Kaiyuh Flats area in Unit 21D that encompasses the RM831 hunt area, which includes the area from Kali Creek (near Galena) downstream to Blackburn Island area and extends along the Kaiyuh Mountains on the south side of the Yukon River and includes Papa Willy's area in the lower section, extends 5 miles north of the Yukon River and runs the full length from Kali Creek down to the Blackburn area.

This would reach nearly to Huslia in some sections and includes the Kaiyuh Hills and old runway areas. It covers water areas and flats but not the hilltops.

Blackburn Island was deliberately excluded as it is already covered by the existing Paradise Controlled Use Area.



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

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

This proposal aims to reduce hunter crowding and restrict aircraft use for hunting in traditional subsistence areas in the Kaiyuh Flats area of Unit 21D. Use of aircraft in traditional hunting areas in the Kaiyuh flats are affecting subsistence hunting and land use patterns. Frequent air traffic is creating noise disturbance, low circling of wildlife and heavy airplane traffic over boats and camped hunters.

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

This proposal was developed by the Middle Yukon River Fish & Game Advisory Committee with assistance from Fish and Game staff.

PROPOSED BY: Middle Yukon River Fish & Game Advisory Committee (OI-F26-186)

Proposal 156

5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19)		
...		
Unit 21(D), that portion south of the South bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek		
RESIDENT HUNTERS:		
...		
1 moose, by registration permit only, up to 15 days during March; a person may not take a cow accompanied by a calf	(Season to be announced)	
...		

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The management goal for this antlerless hunt is to provide additional harvest opportunity and meet harvest objectives. This harvest opportunity of antlerless moose is recently possible because the moose population in the Kaiyuh Flats is increasing rapidly, especially the number of cows in the population. This reauthorization will likely improve or better maintain hunting opportunity. If this antlerless moose hunt is not reauthorized, opportunity to utilize a harvestable surplus of cow moose would be lost and the ability to meet intensive management (IM) harvest objectives could be reduced. Slowing the rate of growth in this population will also reduce the likelihood of dramatic shifts in population expansion and contraction.

The IM harvest objective for Unit 21D is 450–1,000 moose. The 10-year average estimated harvest during 2015–2024 was 388 moose, which includes the reported and estimated unreported harvest. The annual estimated harvest has not been within the harvest objective since 2003 when the estimated harvest was 489 moose. Additional harvest from this hunt will help make progress toward achieving the IM harvest objectives without reducing bull-to-cow ratios to low levels and allow subsistence hunters to benefit from the opportunity to harvest cow moose.

Analysis of three trend count areas (Squirrel Creek, Pilot Mountain, and Kaiyuh Slough) within the Kaiyuh Flats in this hunt area demonstrated an increasing trend in moose abundance from 2001 to present. Geospatial population estimate data also increased from 1,897 ($\pm 11\%$) moose in 2011 to 4,116 ($\pm 10\%$) moose in 2017. Moose twinning data for the hunt area also showed high twinning rates from 2004 to 2024 (avg. = 36.1%), with the most recent 5-year twinning rate average (2020-2024) of 27.8%.

The portion of 21D affected by this reauthorization is approximately 21% (2,559 mi²) of Unit 21D (12,093.6 mi²). The department estimates moose abundance in this area at 4,000–4,500 moose, which is approximately 39–44% of the total moose estimated in Unit 21D (10,478 moose ($\pm 1,572$)) in 2024. The current total 21D moose population estimate was above the IM population objective for all of Unit 21D (12,093.6 mi²) of 9,000–10,000 moose.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-017)

Proposal 157

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM816, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM816, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM816. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-203)

Proposal 158

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM817, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM817, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM817.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-204)

Proposal 159

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM818, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM818, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM818. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-206)

Proposal 160

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM820, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 21 Moose drawing hunt DM820, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM820.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-207)

Proposal 161

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM892, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM892, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM892.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-208)

Proposal 162

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM922, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 24 Moose drawing hunt DM922, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM922. There is currently no allocation cap on how many tags may be drawn by Non-Residents.

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is one of the most accessible moose hunts in Alaska and provides opportunity for Alaskans to affordably fill the freezer on a road system any bull hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-210)

Proposal 163

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

Limit the Non-Resident permit allocation for the Unit 24/25 Moose drawing hunt DM920, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 24/25 Moose drawing hunt DM920, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM920.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is one of the most accessible moose hunts in Alaska and provides opportunity for Alaskans to affordably fill the freezer on a road system any bull hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-209)

Proposal 164

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

Change allocation in moose hunts DM809, DM810and DM811 in 21B to 80% for residents and 20% for non-residents as follows:

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

At the 2026 Southcentral Region board meeting, the board set a precedent of sorts on draw permit allocations when the nonresident allocation was above 20 percent. The board decided that for “trophy” species like mountain goat, nonresidents should receive 20 percent of the available permits and for “meat” animals like elk, nonresidents should receive 10 percent of the permits.

If we were to label the Upper Nowitna moose population as a “trophy” species, then the allocation of permits for this area should be no more than 20 percent going to nonresidents.

We propose to lower the nonresident allocation and raise the resident allocation so we have an 80/20 resident/nonresident split as follows:

DM 810 Resident – 16 permits

DM 809 Nonresident unguided – 1 permit

DM 811 Nonresident must-be-guided – 3 permits

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

Resident/Nonresident Draw Tag Allocation

Upper Nowitna River Moose Hunt Unit 21B

DM 809/810/811

Background: The upper Nowitna River area in Unit 21B within the Nowitna National Wildlife Refuge (NNWR) is known for its “trophy” moose. It became a hot spot for moose hunters and due to concerns too many moose would be taken along the river, the Board of Game made it a draw-only “trophy” moose hunt (DM 810) in the early 2000s within the upper Nowitna River corridor, similar to the Koyukuk moose hunt. The only way a hunter was allowed to keep the moose antlers from the Upper Nowitna River area was if he or she won the DM 810 permit or hunted under a general season OTC tag 2 miles outside the river corridor on either side.

The new DM 810 draw hunt had 20 permits available and was just like other draw hunts in the state where anyone could apply equally for a permit from one pool of tags. Since more residents than nonresidents typically put in for the permit, residents won most of the permits. That wasn't good for the guide with exclusive guiding privileges in the NNWR, so he put in a proposal at the 2008 Interior Board of Game meeting (Proposal 55) to change the allocation to 50/50 resident/nonresident. But since that alone wouldn't help him get clients, he also asked the board to make this a must-be-guided moose hunt for all nonresidents.

Part of his argument was that a lot of residents would win that permit but not hunt after they found out the area is hard to access and expensive to fly into. Which is true of a lot of draw permits. But the gist of the proposal was that he wasn't getting enough clients under the DM 810 draw hunt.

The board ended up passing Proposal 55 in 2008, separating out the DM 810 permits with a 50/50 resident/nonresident permit allocation, 10 permits to residents (DM 810) and 10 to nonresidents, 7 of which were must-be-guided (DM 811), with the remaining 3 going to nonresident unguided (DM 809).

The fact that we have a 50/50 resident/nonresident draw permit allocation, regardless if this is a “trophy” moose population, if the area is expensive or hard to get to, or a certain percentage of residents don't hunt their permit, is just a slap in the face to resident Alaskans who live here and raise their kids here. **Under no circumstances should we ever allocate half of any draw permits to nonresidents, whether it is considered a “trophy” animal or a meat animal.**

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-096)

Proposal 165

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

Establish a winter registration moose hunt within a portion of the Hammond River drainage of Unit 24A as follows:

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

Establish a winter registration hunt within a portion of the Hammond River drainage of Unit 24A.

.... (22)

Unit 24(A), that portion of the
Dalton Highway Corridor
Management Area, **outside the
Hammond River drainage
downstream from the Canyon
Creek drainage**

RESIDENT HUNTERS:

1 bull by drawing permit; Sept. 1 – Sept 25
up to 70 permits may be issued (General Hunt only) in combination with Unit
25(A), that portion within the
Dalton Highway Corridor Management Area

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or Sept. 5 – Sept. 25
antlers with 4 or more brow
tines on one side by drawing
permit only; up to 70 permits
may be issued in combination
with Unit 25(A), that portion
within the Dalton Highway
Corridor Management Area

**Unit 24(A), that portion
within the Hammond River
drainage upstream and
including the Canyon Creek
drainage**

RESIDENT HUNTERS:

1 bull; or Sept. 1 – Sept 25
(General Hunt only)

RESIDENT HUNTERS:

1 antlered bull, by registration Dec. 15 – Apr. 15 permit only

NONRESIDENT HUNTERS: No Open Season

Remainder of Unit 24(A)

RESIDENT HUNTERS:

1 bull Sept. 1 – Sept 25

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or Sept. 5 – Sept. 25
antlers with 4 or more brow
tines on one side

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

Currently, due to the revocation of Public Land Orders (PLO) 5150 and 5180 under PLO 7966 on February 25, 2026 - 2.1 million acres of Bureau of Land Management (BLM) lands in the Dalton Highway Corridor are now State selected lands and no longer under Federal subsistence priority as of March 27, 2026. To allow for subsistence opportunity within Gates of the Arctic National Park, a winter moose hunt is being requested. This additional hunting opportunity is necessary to allow for subsistence utilization of available Federal lands in Gates of the Arctic National Park in Unit 24A because hunting opportunity has been lost on BLM lands.

Opening a winter moose season would provide opportunities for Federally qualified subsistence users to harvest a moose utilizing snowmachines. This would be a contiguous regulatory hunt since there's already a similar hunt in Unit 24B.

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

This proposal was developed during a discussion Koyukuk River Fish & Game Advisory Committee meeting and with ADFG Area Biologists.

PROPOSED BY: Jack Reakoff (OI-F26-180)

Proposal 166

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

Reduce Caribou bag limit for Western Arctic Caribou herd in 24B and 24C remainder as follows:

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

Reduce the **BAG LIMIT 4 BULL CARIBOU PER REGULATORY YEAR IN 24B REMAINDER JULY 1 - OCT 1 - NOV 1-JUNE 30**

[FIVE CARIBOU PER DAY HOWEVER CALVES MAY NOT BE TAKEN, BULLS

JULY 1-OCT 14-&-FEB 1-JUNE 30, COWS JULY 15-APRIL 30]

BAG LIMIT 4 BULL CARIBOU PER REGULATORY YEAR IN 24C REMAINDER

JULY 1 -OCT1 - NOV 1- JUNE 30

[FIVE CARIBOU PER DAY HOWEVER CALVES MAY NOT BE TAKEN, BULLS

JULY 1-OCT 14-&-FEB 1-JUNE 30, COWS JULY 15-APRIL 30]

These two GMU units 24B and 24C remainder are within the range of the Western Arctic Caribou herd predominantly. Regulation reduction should include these sub units of GMU 24.

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger

growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

The Western Arctic Caribou Herd population has declined dramatically. The WACH work group is very concerned as I am with excessive cow caribou take is a main driver currently, weather events and predation are additive. I informed the Koyukuk River AC of my concerns to eliminate cow take with a uniform bull bag limit and seasons applied across the WACH Range. The data and social media shows that large numbers of cow harvest it is exceeding sustained yield.

Cow caribou almost never have twins. Cow caribou short yearling that experience hardships like hot summer as a calf, deep snow, rain icing in winter, and late spring will typically not produce its first calf until her fourth birthday. Currently large percentage of recruited cows have lost one year of production, affecting overall recruitment. This weak cohort with a 10 year life span would only have 6 calves at best. Strong cohorts with better conditions will produce at 3 years, or 7 total calves in her life span.

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

I have discussed these issues with the Koyukuk River AC members as I am chairman, Western Interior Regional Advisory Council and other Regions. I discuss caribou management with ADFG managers about what strategies to use to address the current situation with all the Northern Caribou herds. I discuss these issues with Federal management NPS, USFWS, and BLM as well as the Federal Subsistence Board. I talk about these caribou issues with people that travel up the Dalton Highway to hunt the Arctic hunt caribou.

PROPOSED BY: Jack Reakoff

(OI-F26-104)

Proposal 167

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit nonresident sheep hunters in Units 26B and 24A via a draw permit system as follows:

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

Limit nonresident sheep hunters in Units 26B and 24A via a draw permit system.

Unit 26B Remainder and Unit 26B within the Dalton Highway Corridor Management Area Nonresidents

Season Dates: Aug 10 – Sept 20

**Bag Limit: 1 ram with full-curl horn or larger every four regulatory years by draw permit only
DS XXX with up-to 5 permits issued.**

Unit 24A Remainder and Unit 24A within the Dalton Highway Corridor Management Area Nonresidents

Season Dates: Aug 10 – Sept 20

**Bag Limit: 1 ram with full-curl horn or larger every four regulatory years by draw permit only
DS XXX with up-to 5 permits issued.**

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

Continued unlimited nonresident sheep hunting opportunity in units 26B and 24A.

From 2022 – 2025, all federal lands in 26B west of the Sag River and 24A were closed by the Federal Subsistence Board to sheep hunting by all users due to sheep conservation concerns. These areas will be opened again to sheep hunting in the fall of 2026.

Sheep are in significant decline in these areas and the 2025/2026 winter certainly was a bad one for sheep. We believe nonresident sheep hunting opportunity should be limited.

The charts below from ADF&G show sheep harvest data for Units 26B and 24A from 2017-2025, The Department was unable to provide sheep harvest statistics for just the areas on federal lands that were closed to all sheep hunting 2022-2025.

Total resident sheep harvests in Unit 26B from 2017-2025: **61 sheep,**

Total nonresident sheep harvests in Unit 26B from 2017-2025: **63 sheep.**

Total resident sheep harvests in Unit 24A from 2017-2025: **46 sheep.**

Total nonresident sheep harvests in Unit 24A from 2017-2025: **43 sheep.**

all 26B Sheep hunters	Unsuccessful hunters			Successful hunters			Total hunters	
	Nonresidents	Residents		Nonresidents	Residents		Nonresidents	Residents
2017	9	34		6	8		15	42
2018	1	40		11	7		12	47
2019	4	39		7	14		11	53
2020	2	41		9	6		11	47
2021	7	48		10	8		17	56
2022	4	15		4	3		8	18
2023	6	14		7	2		13	16
2024	8	17		5	6		13	23
2025	6	25		4	7		10	32

All 24A Sheep hunters	Unsuccessful			Successful			Total hunters	
	Nonresidents	Residents		Nonresidents	Residents		Nonresidents	Residents
2017	3	39		10	5		13	44
2018	2	42		5	11		7	53
2019	9	49		6	12		15	61
2020	6	39		10	7		16	46
2021	13	42		8	3		21	45
2022	9	6		1	0		10	6
2023	4	4		3	1		7	5
2024	4	10		0	2		4	12
2025	2	8		0	5		2	13

While the number of resident sheep hunters in these units is 2 to 5 times more than nonresident sheep hunters, nonresidents take on average 50% of the total sheep harvest. With sheep in such decline in these areas and fewer legal rams available, residents should have a clear sheep hunting priority to avoid crowding and conflicts and any future closures.

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

Thanks to Department staff for providing the data!

PROPOSED BY: Resident Hunters of Alaska (OI-F26-093)

Proposal 168

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

Amend the spring bear baiting season in Units 21B, 21C, 21D, 24B, 24C, 24D, and 25D to open April 1 and close June 30, no change to the fall season (August 1–October 31) as follows:

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

Amend the spring bear baiting season in Units 21B, 21C, 21D, 24B, 24C, 24D, and 25D to open April 1 and close June 30. No change to the fall season (August 1–October 31).

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

The current April 15 opener occurs during spring break-up, when access to remote bait sites is often unsafe or not possible. These units are largely roadless and depend on snowmachine or ski-equipped aircraft access. By mid-April, warming temperatures frequently create overflow, deteriorating ice, and unpredictable travel conditions that limit safe access.

Early April generally provides more stable late-winter conditions, allowing safer and more efficient transport of bait and equipment before break-up. Bears typically emerge from dens in early to mid-May, so this change would not increase harvest opportunity, only allow earlier bait site establishment and improve reliability of operations.

This proposal improves safety, access, and consistency for hunters and guides while maintaining current harvest timing. No negative impacts to bear populations are anticipated.

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

Informal discussions with other area users.

PROPOSED BY: Charles Jagow

(OI-F26-085)

Proposal 169

5 AAC 85.060; 84.270. Hunting seasons and bag limits for fur animals; Furbearer trapping.

Extend hunting and trapping for Wolverine to April 30 as follows:

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

Wolverine hunting and trapping season ends April 30.

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

extend hunting and trapping for Wolverine.

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

PROPOSED BY: Gilbert huntington

(OI-F26-105)

Northeast Alaska - Units 25A, 25B, 25D, 26B & 26C

Proposal 170

5 AAC 85.025 (a)(19) and (21). Hunting seasons and bag limits for caribou.

Decrease the caribou hunting bag limit for residents in Unit 24A remainder from 10 caribou to 5 bulls, and in Unit 26B remainder from 5 caribou to 5 bulls as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19) ...		
Unit 24(A) Remainder		
RESIDENT HUNTERS: <u>5 bulls</u> [10 CARIBOU]	July 1 – Apr. 30	
NONRESIDENT HUNTERS: 2 bulls		Aug 1 – Sept. 30
(21) ...		
Unit 26(B) Remainder		
RESIDENT HUNTERS: <u>5 bulls</u> [5 CARIBOU]	July 1 – Apr. 30	
NONRESIDENT HUNTERS: 2 bulls		Aug 1 – Sept. 15

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

The 2025 Central Arctic Herd (CAH) population estimate indicated there was a decrease in the population from 2022 (34,642 caribou, 95% CI 32,419–36,866) to 2025 (26,621 caribou, 95% CI

25,466 – 27,775). The 2025 population estimate is below the intensive management objective for this herd of 28,000–32,000 caribou. The CAH range primarily encompasses Units 26B and Unit 24A.

To decrease harvest pressure on the reproductive component of the herd, the department recommends that the bag limits for units 24(A) and 26(B) be changed from any caribou bag limits to a 5 bull only bag limit. At the current population size and trend, there is no longer a harvestable surplus of cow caribou to support the current any caribou bag limits. However, the harvestable surplus of bulls is adequate to support continued bull harvest as long-term estimates indicate bull:cow ratios have remained above the management objective of 40 bulls per 100 cows.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-029)

Proposal 171

5 AAC 85.025 (a)(19) and (21). Hunting seasons and bag limits for caribou.

Create a registration hunt for cow caribou in units 24A and 26B for residents, to allow a limited harvest of cows to be taken when available, with season dates and bag limit to be announced as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(19) ...		
Unit 24(A) Remainder		
RESIDENT HUNTERS: 10 caribou	July 1 – Apr. 30	
<u>Up to 2 cows may be taken by registration permit only, during a season to be announced from July 1 – April 30</u>	<u>TBA</u>	
NONRESIDENT HUNTERS: 2 bulls		Aug 1 – Sept. 30

(21)

...

Unit 26(B) Remainder

RESIDENT HUNTERS:

5 caribou

July 1 – Apr. 30

**Up to 2 cows may be
taken by registration
permit only, during a
season to be announced
from July 1 – April 30**

TBA

NONRESIDENT HUNTERS:

2 bulls

Aug 1 – Sept. 15

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

The 2025 Central Arctic Herd (CAH) population estimate indicated there was a decrease in the population from 2022 (34,642 caribou, 95% CI 32,419–36,866) to 2025 (26,621 caribou, 95% CI 25,466 – 27,775). The 2025 population estimate is below the intensive management objective for this herd of 28,000–32,000 caribou. The CAH range primarily encompasses Units 26B and Unit 24A.

To decrease harvest pressure on the reproductive component of the herd, the department recommends in a separate proposal that the bag limits for units 24(A) and 26(B) be changed from either a 10 caribou or 5 caribou bag limit to a 5 bull only bag limit, which will continue to be administered as a general season harvest ticket hunt. At the current population size and trend, there is no longer a harvestable surplus of cow caribou to support the current any caribou bag limits. However, The CAH population has fluctuated regularly above and below the intensive management objective over the past 25 years. This has resulted in the department seeking regulatory changes to either liberalize or restrict harvest opportunity at most Interior Region Board of Game meetings. This proposal seeks to implement an adaptive regulatory structure for cow caribou to maximize harvest opportunity when harvestable surplus exists or restrict harvest during times of conservation. In addition, a registration permit would allow the department to determine an in-season quota to prevent over-harvest of cows when warranted.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-030)

Proposal 172

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

Reduce the resident bag limit for caribou in 26B remainder as follows:

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

Reduce the resident **BAG LIMIT 5 BULL CARIBOU PER REGULATORY YEAR IN 26B REMAINDER JULY 1 -OCT 1 - NOV 1-JUNE 30**

[RESIDENTS FIVE CARIBOU JULY 1-APRIL 30]

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger

growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

Decline Central Arctic herd has declined 61% since 2010, 23% since 2022 to 2026.

continued cow caribou harvest is not sustainable at this time. Cow caribou almost never have twins. Cow caribou short yearling that experience hardships like hot summer as a calf, deep snow, rain icing in winter, and late spring will typically not produce its first calf until her fourth birthday. Currently large percentage of recruited cows have lost one year of production, affecting overall recruitment. This weak cohort with a 10 year life span would only have 6 calves at best. Strong cohorts with better conditions will produce at 3 years, or 7 total calves in her life span.

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

I have discussed these issues with the Koyukuk River AC members as I am chairman, Western Interior Regional Advisory Council and other Regions. I discuss caribou management with ADFG managers about what strategies to use to address the current situation with all the Northern Caribou herds. I discuss these issues with Federal management NPS, USFWS, and BLM as well as the Federal Subsistence Board. I talk about these caribou issues with people that travel up the Dalton Highway to hunt the Arctic caribou.

PROPOSED BY: Jack Reakoff

(OI-F26-108)

Proposal 173

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

Reduce the bag limit for Caribou in 24B remainder as follows:

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

BAG LIMIT 5 BULL CARIBOU PER REGULATORY YEAR IN 24A REMAINDER JULY 1 -OCT 1 - NOV 1-JUNE 30

[RESIDENTS TEN CARIBOU JULY 1-APRIL 30]

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

I would like to address the caribou decline of all four Arctic caribou herds Western Arctic, Central, and Porcupine. Although Teshukpuk herd is stable but not significant in 24A.

GMU 24A remainder caribou can have all four herds present in winter, spring and fall. Western has been west out of this unit recently. Severe weather weakening of these populations, combined with cow harvest and predation.

Currently the Porcupine herd has declined 33% since 2017. Central Arctic herd has declined 61%, These two herds can not support cow harvest and large bag limits with road access.

There are bulls to harvest with a longer season to offset the necessary elimination of cow harvest.

Sustained yield conservation is paramount, as they are an important food resource for Alaskans subsistence use.

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

PROPOSED BY: Jack Reakoff

(OI-F26-106)

Proposal 174

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

Change the bag limit for caribou to 5 bulls within the Dalton Highway corridor management area of GMU 25A as follows:

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

WITHIN THE DALTON HIGHWAY CORRIDOR MANAGEMENT AREA GMU 25A RESIDENT BAG LIMIT 5 BULL CARIBOU PER REGULATORY YEAR JULY 1 -OCT 1 - NOV 1-JUNE 30

[RESIDENTS TEN CARIBOU JULY 1-APRIL 30]

The proposal focuses on best use of the limited bull caribou, eliminating cow harvest entirely. The season is set for Bull caribou when they are best to eat. Bulls start into the rut in early October, they become unusable for food while breeding. It is best reproductive management to not disrupt the breeding cows and bulls during the rut.

Bulls are very run down after the intense short breeding activity. The poor flavor is cleared out by November, they have used all fat as well as muscle protein they can be eaten in early November but not prime, but are typically regained most muscle by February 1.

Cows have increasing gestational demands in February. If winter conditions are severe cows will draw significant protein from muscle to support the fetus. Breakup timing is of critical importance for all caribou. When the temperatures warm up to above freezing normally in late April, the Cotton Grass Sedge Tussock shoots up the flower blossom high in protein. The shape of the

tussock and open habitat allow it to be the first large protein source for caribou muscle loss and final fetal development. Deep snow and late spring timings are very detrimental to caribou if they don't have access to this resource.

Arctic Caribou will seek and eat predominantly Tussock flowers as they move towards calving and summer range. Like all grasses the tussock flower is pollinated by the wind. In early summer after the Tussock is pollinated they are switching to wildflowers. Woolly Lousewort, Dryas, Fireweed, and other flowers are important protein/ nectar for lactating cow caribou and Bulls growing and accumulating fat.

Early hot weather is extremely bad for caribou. The Tussock will pollinate too quickly, pollinating insects will be very active in the long days to pollinate the wildflowers in a short period of time. Mosquitoes and parasitic fly harassment exacerbates the ability to gain fat and produce quality lactation. Cows will be thin in falls after a long hot summer, and calf weights will be below normal. These calves can become a weak cohort with these cows delayed reproduction until 4 years old.

Lichen is always eaten throughout the year by caribou to maintain the microbiome in their digestive system. Lichen intake is vastly reduced during spring and summer normally. Lichen intake will increase in summer if high protein feed is lost.

Bulls will not have as thick of fat in fall after a hot summer, especially after a late spring. Five year old bulls are skeletal mature and dominate breeding due to the larger fat reserves than younger growing bulls. The large bulls will be especially run down post rut after a hot summer. A good rule of thumb is; if caribou aggregate in summer to facilitate a survey they are in hardship at that time.

Cows are in lactation through the fall right before the rut. It is not best management to harvest cows in summer or fall when in lactation. The cow caribou are real skinny and meat is not of the same quality as in Early October and early winter.

If limited cow harvest can eventually be supported it should only be from early October to February. Bulls can be harvested most of the year except for during the rut, and just after the rut.

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

GMU 25A caribou can have all four herds present in winter, spring and fall. Western has been west out of this unit recently. Severe weather weakening of these populations, combined with cow harvest and predation.

Currently the Porcupine herd has declined 33% since 2017. Central Arctic herd has declined 61% since 2010, 23% since 2022 to 2026. , These two herds can not support cow harvest and large bag limits with road access.

There are bulls to harvest with a longer season to offset the necessary elimination of cow harvest.

Sustained yield conservation is paramount, as they are an important food resource for Alaskans subsistence use.

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

I have discussed these issues with the Koyukuk River AC members as I am chairman,

Western Interior Regional Advisory Council and other Regions. I discuss caribou management with ADFG managers about what strategies to use to address the current situation with all the Northern Caribou herds. I discuss these issues with Federal management NPS, USFWS, and BLM as well as the Federal Subsistence Board. I talk about these caribou issues with people that travel up the Dalton Highway to hunt the Arctic caribou.

PROPOSED BY: Jack Reakoff

(OI-F26-146)

Proposal 175

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

Central Arctic Caribou Herd Reduce nonresident bag limit to one bull with a season Aug 1 – Sept 15. Eliminate the opportunity for residents to take cows as follows:

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

Reduce nonresident bag limit to one bull with a season Aug 1 – Sept 15. With the herd in decline and increasing nonresident participation, nonresidents should be limited to 1 bull only.

Eliminate the opportunity for residents to take cows. With the herd in decline, we should not allow any cow harvests until the population increases. Even a limited cow harvest can affect growth of the herd.

26B Remainder Caribou

Resident season July 1 – April 30

Bag Limit: 5 Bulls

Nonresident season Aug 1 – Sept 15

Bag Limit: 1 Bull

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

Decline in Central Arctic Caribou Herd

Increasing Nonresident Participation

Crowding Issues Along Rivers

The 2025 photocensus estimate of Central Arctic Herd (CAH) caribou showed a population of 26,600 animals, a decline of 8,000 caribou from the previous estimate in 2022. The current

population estimate is below the Intensive Management (IM) population objective of 28,000 – 32,000 animals.

The chart below from ADFG shows a significant increase in the number of nonresident hunters hunting the Central Arctic caribou herd in Unit 26B.

Year	Number of hunters	
	Nonresidents	Residents
2010	373	1424
2011	278	1361
2012	310	1244
2013	461	1087
2014	465	1029
2015	472	842
2016	351	794
2017	266	358
2018	198	310
2019	256	329
2020	209	501
2021	457	479
2022	570	580
2023	753	799
2024	1034	1127
2025	1001	

Along with increasing nonresident hunters, there has been an increase in the number of transporters catering to nonresident hunters, with airboat transporters flooding the Ivishak and other rivers with hunters, resulting in crowding and conflicts and numerous complaints.

Residents have a much longer season (July 1 – April 30) than nonresidents and are currently allowed to take five caribou, one of which may be a cow. In 2024 (data not available for 2025 yet) 228 cows were taken from the declining CAH by residents.

Nonresidents have an Aug 1 – Sept 15 season and a 2-bull bag limit. As the chart below shows, nonresidents harvested 50% of the CAH in 2024

residency	Number of caribou taken/hunter during 2024						
	0	1	2	3	4	5	total caribou
Nonresident hunters	497	501	36				
caribou taken by nonresidents		501	72				573
resident hunters	716	290	92	22	2	5	
caribou taken by residents		290	184	66	8	25	573

The CAH is important for feeding Alaskans and is below the IM population objective. There should be no cow harvests allowed until the herd increases. The nonresident bag limit should be reduced.

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

Thanks to Department staff for the charts and data!

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-091)

Proposal 176

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

Shorten the nonresident caribou season in GMU 26B to Aug 1-30th as follows:

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

I recommend shortened the Non resident season to Aug 1-30th. This would shorten the season, take and over-access issue.

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

There are two issues with 26B. One is the declining herd numbers between the porcupine herd and Central arctic herd. The second is an access issue with Nonresidents coming up in non-regulated amounts. This puts additional strain on the caribou herd and pushes the herd away from access from residents.

ADFG photocensus:

(Fairbanks) A photocensus of the Porcupine caribou herd (PCH) was completed on July 4, 2025, and resulted in a population estimate of 143,000 caribou. The following day, a photocensus of the Central Arctic caribou herd (CAH) was completed and resulted in a population estimate of 26,600 caribou.

Both herds have declined since their previous photocensus estimates and the declines were expected based on annual monitoring of adult survival, parturition (pregnancy) rates, and calf survival.

Porcupine caribou herd summary The 2025 PCH photocensus estimate of 143,000 caribou is lower than the previous photocensus in 2017. The 2017 photocensus estimate was 218,000 caribou, which was the most caribou ever estimated in this herd since monitoring began in the 1970s. This herd has experienced periods of growth and decline since photocensus efforts began. In 1979, the herd was around 106,000 caribou, grew to 178,000 in 1989, declined to 123,000 in 2001, and then increased to 218,000 in 2017. This current period of decline is steeper than was observed during the decline in the 1990s. A reduction in adult survival, calf survival, and other population metrics

since 2017 supports the photocensus results that the herd is in a decline. Future photocensus population estimates and monitoring of the herd will continue to document the nature and duration of this decline. Central Arctic herd summary The 2025 CAH photocensus estimate of 26,600 is lower than the previous photocensus in 2022 which estimated 34,600 caribou. Previously, the CAH experienced a population peak in 2010 at 68,400 caribou and then declined to 22,600 in 2016. Similar to the PCH, reduced adult survival, calf survival, and parturition rates support the photocensus results indicating that the CAH is no longer growing and has declined since 2022.

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

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

PROPOSED BY: Brian Watkins

(OI-F26-005)

Proposal 177

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

Modify the nonresident caribou hunting in GMU 26B to a draw tag system as follows:

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

N- 26B- Draw Tag- Aug 1- Sept 15

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

There are two issues with 26B. One is the declining herd numbers between the porcupine herd and Central arctic herd. (adfg photocensus information below) The second is an access issue with Nonresidents coming up in non-regulated amounts. This puts additional strain on the caribou herd and pushes the herd away from the DHCMA road access. This would also allow increased revenue for the department with draw hunt applications.

ADFG photocensus:

(Fairbanks) A photocensus of the Porcupine caribou herd (PCH) was completed on July 4, 2025, and resulted in a population estimate of 143,000 caribou. The following day, a photocensus of the Central Arctic caribou herd (CAH) was completed and resulted in a population estimate of 26,600 caribou.

Both herds have declined since their previous photocensus estimates and the declines were expected based on annual monitoring of adult survival, parturition (pregnancy) rates, and calf survival.

Porcupine caribou herd summary The 2025 PCH photocensus estimate of 143,000 caribou is lower than the previous photocensus in 2017. The 2017 photocensus estimate was 218,000 caribou, which was the most caribou ever estimated in this herd since monitoring began in the 1970s. This

herd has experienced periods of growth and decline since photocensus efforts began. In 1979, the herd was around 106,000 caribou, grew to 178,000 in 1989, declined to 123,000 in 2001, and then increased to 218,000 in 2017. This current period of decline is steeper than was observed during the decline in the 1990s. A reduction in adult survival, calf survival, and other population metrics since 2017 supports the photocensus results that the herd is in a decline. Future photocensus population estimates and monitoring of the herd will continue to document the nature and duration of this decline. Central Arctic herd summary The 2025 CAH photocensus estimate of 26,600 is lower than the previous photocensus in 2022 which estimated 34,600 caribou. Previously, the CAH experienced a population peak in 2010 at 68,400 caribou and then declined to 22,600 in 2016. Similar to the PCH, reduced adult survival, calf survival, and parturition rates support the photocensus results indicating that the CAH is no longer growing and has declined since 2022.

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

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

PROPOSED BY: Brian Watkins

(OI-F26-006)

Proposal 178

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

Modify the nonresident caribou hunting in GMU 26B to a draw tag system with three separate hunts as follows:

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

N- 26B- Draw Tag- Split into 3 Separate tags Aug 1- Aug 15 maximum 20

Aug 16- Aug 31 Maximum 20

Sept 1- Sept 15 Maximum 20

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

There are two issues with 26B. One is the declining herd numbers between the porcupine herd and Central arctic herd. (adfg photocensus information below) The second is an access issue with Nonresidents coming up in non-regulated amounts. This puts additional strain on the caribou herd and pushes the herd away from the DHCMA road access. This would also allow increased revenue for the department with draw hunt applications.

ADFG photocensus:

(Fairbanks) A photocensus of the Porcupine caribou herd (PCH) was completed on July 4, 2025, and resulted in a population estimate of 143,000 caribou. The following day, a photocensus of the

Central Arctic caribou herd (CAH) was completed and resulted in a population estimate of 26,600 caribou.

Both herds have declined since their previous photocensus estimates and the declines were expected based on annual monitoring of adult survival, parturition (pregnancy) rates, and calf survival.

Porcupine caribou herd summary The 2025 PCH photocensus estimate of 143,000 caribou is lower than the previous photocensus in 2017. The 2017 photocensus estimate was 218,000 caribou, which was the most caribou ever estimated in this herd since monitoring began in the 1970s. This herd has experienced periods of growth and decline since photocensus efforts began. In 1979, the herd was around 106,000 caribou, grew to 178,000 in 1989, declined to 123,000 in 2001, and then increased to 218,000 in 2017. This current period of decline is steeper than was observed during the decline in the 1990s. A reduction in adult survival, calf survival, and other population metrics since 2017 supports the photocensus results that the herd is in a decline. Future photocensus population estimates and monitoring of the herd will continue to document the nature and duration of this decline. Central Arctic herd summary The 2025 CAH photocensus estimate of 26,600 is lower than the previous photocensus in 2022 which estimated 34,600 caribou. Previously, the CAH experienced a population peak in 2010 at 68,400 caribou and then declined to 22,600 in 2016. Similar to the PCH, reduced adult survival, calf survival, and parturition rates support the photocensus results indicating that the CAH is no longer growing and has declined since 2022.

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

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

PROPOSED BY: Brian Watkins

(OI-F26-015)

Proposal 179

5 AAC 85.025; 92.069. Hunting seasons and bag limits for caribou; Special provisions for moose and caribou drawing permit hunts.

Require nonresident caribou hunters that are not accompanied by a guide or a resident second degree of kindred to participate in a limited draw permit system as follows:

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

GMU 26B Nonresident Caribou Draw Permit System

Proposed Regulatory Action

Place nonresident caribou hunters NOT using a registered guide, and NOT accompanied by resident second-degree of kindred ON A DRAW TAG ALLOCATION IN GMU 26B

Overview of the Proposal

This proposal would place nonresident caribou hunters NOT using a registered guide, and NOT accompanied by resident second-degree of kindred in Game Management Unit 26B on a limited draw permit system.

Nonresident caribou hunters using a registered guide, or accompanied by resident second-degree of kindred in GMU 26B would still be on a harvest ticket permit structure.

Under this structure:

- **Up to 250 permits for non resident caribou hunters NOT using a registered guide, and NOT accompanied by resident second-degree of kindred would be available annually**
- **Season dates: August 1 – September 15**
- **Bag limit: One bull caribou per permit holder**

This framework establishes a reasonable cap on total nonresident participation while still maintaining opportunity for nonresident hunters.

Proposal Justification

Increasing Nonresident Hunting Pressure

Harvest data used in this proposal was obtained from the Alaska Department of Fish and Game (ADFG) and compares resident and nonresident hunting statistics within Unit 26B. ADFG staff were able to provide nonresident harvest and participation data for the full fifteen-year period from 2010–2025. However, resident harvest data for 2025 was not yet finalized at the time this proposal was written because the spring season was still ongoing. According to ADFG staff, preliminary 2025 resident data is tracking similarly to 2024 levels. Therefore, statistical comparisons in this proposal use nonresident data from 2010–2025 and resident data from 2010–2024.

Based on preliminary data from the Alaska Department of Fish and Game, nonresident hunting pressure in Unit 26B has steadily increased in recent years. Since 2021, nonresident hunters have accounted for nearly 50 percent of the total hunting pressure in the unit.

Nonresident Share of Total Hunting Pressure – GMU 26B

Year	Percent of Total Hunting Pressure (Nonresident)
2010	20.75%
2011	16.96%
2012	19.94%

2013	29.78%
2014	31.12%
2015	35.92%
2016	30.65%
2017	42.62%
2018	38.97%
2019	43.76%
2020	29.40%
2021	48.82%
2022	49.56%
2023	48.52%
2024	47.80%

This increase has resulted in:

- Noticeable overcrowding
- Increased competition between resident and nonresident hunters
- Concentration of hunting pressure along road and river corridors
- Decreased Alaska resident hunter satisfaction

As a result, many Alaska residents are experiencing diminished hunt quality and increased difficulty harvesting caribou for their families.

If average resident hunter participation remains around 1,000 hunters* (a level reached in only 6 of the 14 years from 2010–2024, Meaning the percentage of nonresident hunting pressure will likely be higher than listed), the proposed permit allocation would effectively cap unguided nonresident hunters at approximately 20% of total hunting pressure each year in Unit 26B.

Importance of Accessible Caribou Hunting for Alaska Residents

Across Alaska, ungulate populations accessible from the road system or reachable by reasonable boat travel in many regions of the state have declined and are struggling. As a result, the remaining accessible hunting opportunities are becoming increasingly important for resident hunters who rely on wild game to feed their families.

Unit 26B and the Central Arctic Caribou Herd (CACH) represent one of the few remaining opportunities for Alaska residents to harvest caribou without drawing a limited permit or paying extremely expensive transporter fly-in costs to access remote areas. Because of this, Unit 26B is becoming an increasingly important food security resource for Alaska residents. Due to unlimited nonresident opportunity and growing demand, many transporters now only offer flat-rate drop hunts at premium prices rather than traditional hourly billing for flight time — a cost structure that the vast majority of Alaska residents cannot reasonably afford.

Effects of Unlimited Nonresident Opportunity

Currently, several factors are contributing to increasing pressure in Unit 26B:

- Unlimited nonresident hunting opportunity
- A liberal nonresident bag limit
- Increasing numbers of transporters, hunt planners, and other businesses catering to DIY nonresident hunters

These factors have led to a substantial rise in nonresident participation, particularly in areas that are road-accessible or boat-accessible. In these areas, hunters are often concentrated into relatively small portions of the unit.

When nonresident opportunity remains unlimited, it can also create a feedback cycle in which increased numbers of nonresident hunters attract additional transporters and commercial services, which in turn make the hunt even more accessible to additional nonresident hunters. As services expand and participation grows, hunting pressure can continue to increase year after year.

Over time, this dynamic has accelerated hunting pressure and intensified crowding in the most accessible portions of the unit. Without reasonable limits on participation, these trends will likely continue to worsen.

Hunter Density and Declining Hunt Quality

While the Central Arctic Caribou Herd may still support harvest biologically, excessive hunter density can significantly reduce hunt quality, hunter satisfaction, and opportunity for resident hunters.

High hunter density can result in:

- Reduced ability for hunters to locate animals
- Increased competition and crowding among hunters in accessible areas
- Greater likelihood of user conflicts

When participation levels become so high that crowding and competition prevent many residents from having a quality hunt, it becomes appropriate to evaluate and implement management tools that help restore balance.

Herd Status and Proactive Management

Recent population surveys indicate that the Central Arctic Caribou Herd is currently estimated at approximately 26,700 animals, a decline from the previous estimate of approximately 34,600 animals in 2022.

Taking proactive steps to manage participation levels before more serious conservation concerns arise is a responsible and precautionary approach to wildlife management. Establishing reasonable limits on nonresident participation would demonstrate that the Board of Game is willing to act proactively in the interest of long-term herd sustainability, while also recognizing the importance of maintaining hunt quality and hunter satisfaction for Alaska residents who rely on these opportunities to harvest wild food for their families.

Precedent for This Management Approach

A similar management structure already exists in Game Management Units 1, 2, and 3 for black bear hunting. In those units, Alaska experienced a substantial increase in DIY nonresident hunters and transporter services, creating rapidly increasing hunting pressure.

In that situation, land managers and regulatory agencies could not effectively regulate the expanding transporter sector, which allowed participation to increase quickly as additional services began catering to DIY nonresident hunters. Guided hunting activity, however, was already regulated through land manager permitting systems, and hunting by Alaska residents and nonresidents accompanied by a resident second-degree of kindred was not identified as a source of the increasing pressure concerns.

As a result, the Board of Game implemented a draw permit system specifically for nonresident hunters NOT using a registered guide and NOT accompanied by a resident second-degree of kindred. This regulatory structure allowed managers to place reasonable limits on the segment of hunters responsible for the rapid increase in participation while still maintaining opportunity for guided hunters and traditional resident-family hunting arrangements.

The same underlying conditions now exist in Unit 26B, where rapidly increasing participation by DIY nonresident hunters—often facilitated by transporters and hunt-planning services—is contributing to rising hunting pressure, user conflicts, and decreased hunter satisfaction. Implementing a similar regulatory structure in Unit 26B would follow an established management approach that has already been adopted by the Board of Game in other regions of Alaska when faced with comparable circumstances.

Benefits of a Limited Draw System

Placing DIY nonresident hunting opportunity on a limited draw permit system with a one-bull bag limit represents a reasonable and balanced management action.

This approach would:

- Maintain nonresident hunting opportunity
- Establish a clear cap on nonresident participation
- Reduce crowding in heavily used areas
- Minimize user conflicts between hunters
- Improve overall hunt quality and hunter satisfaction for Alaska residents

Second degree of kindred and Guided Hunting Justification

Maintaining nonresident caribou hunters using a registered guide or accompanied by a resident second-degree of kindred on a harvest ticket system would ensure that these hunters continue to have reasonable opportunity to hunt while the primary source of increasing participation—unguided nonresident hunters—would be managed through a draw permit structure.

Preliminary data from the Alaska Department of Fish and Game indicates that, on average, fewer than 30 guided nonresident caribou hunters participate in Unit 26B annually, representing a very small and consistent portion of overall hunting participation within the unit.

Three federal guide concessions on the Arctic National Wildlife Refuge in GMU 26B — ARC 10, ARC 9, and ARC 6 — operate within the area affected by this proposal, and portions of Gates of the Arctic National Preserve may also support guided hunting activity. These federally authorized guiding operations represent a relatively small and defined portion of overall hunting activity in the unit and are not the primary drivers of the increasing nonresident pressure and crowding concerns addressed by this proposal. Hunting guides operating on these federal lands already have limits on the numbers of hunters they can take each year put in place the federal land manager.

Because guided hunters and nonresidents hunting with resident family members typically represent a smaller and more controlled segment of overall hunting participation, maintaining harvest ticket opportunity for these hunters would allow these traditional hunting arrangements to continue while the draw permit system focuses on moderating the rapidly increasing participation of unguided nonresident hunters.

Additionally:

- Transporters and other businesses catering to DIY nonresident caribou hunters would still be able to offer their services to significant pool of nonresident draw permit holders

- These businesses would also still be able to provide and offer services to Alaska residents

Intent of the Proposal

The intent of this proposal is not to eliminate nonresident hunting opportunity. Rather, the goal is to:

- Implement a reasonable management structure
- Balance opportunity among user groups
- Reduce excessive crowding in accessible areas and improve hunter satisfaction
- Protect the ability of Alaska residents to harvest caribou for their families

By proactively managing DIY nonresident participation through a draw permit system, the Board of Game can help ensure that Unit 26B remains a sustainable and high-quality hunting opportunity for current and future generations of Alaskans while still allowing nonresident hunters to participate in a fair and regulated manner.

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

Overcrowding, user conflict, and decreasing hunter satisfaction in Unit 26b for caribou hunting.

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

Yes this proposal was discussed with numerous other Alaska residents, hunting guides in 26B, and was supported by the Mat Su Valley AC.

PROPOSED BY: Grant Kopplin

(OI-F26-026)

Proposal 180

5 AAC 92.510. Areas closed to hunting.

Require archery hunters along the Dalton Highway in Unit 26B to be a minimum distance from the edge of the road; 5 miles for rifle hunters and 100 yards for archers during August and September as follows:

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

I propose that the board adopt regulations that archery hunters, like rifle hunters, are required to be a minimum distance from the edge of the road; 5 miles for rifle hunters and 100 yards for archers. The regulatory change for archery would only be in effect during the peak time for hunting from highway vehicles, August and September. This change would encourage hunters to use designated parking areas rather than parking wherever is most convenient to the Caribou they are following with their vehicles. This change would also make it illegal for archery hunters using highway vehicles from shooting from areas close to the road, like roadside ditches, which

some view as a practice inconsistent with fair chase. My conversations with state troopers indicate that this would be a clear, enforceable change.

Possible new wording of regulation: Archery hunters in GMU 26B must be at least 100 yards from the edge of the Dalton Highway when actively shooting at any game species during August and September.

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

I would like the board to address safety concerns associated with Caribou hunters using highway vehicles along the Dalton Highway in Unit 26B. Data from the ADF&G shows that between 2010 and 2024 the total number of hunters (residents and non-residents) using highway vehicles in this GMU has increased from 1033 to 1219. The increase is particularly notably during August and September when most hunt this area.

Personal observations after hunting GMU 26B since 1992 and conversation with individuals from the ADF&G, DOT, trucking companies, the Alaska State Troopers, and other hunters all indicated that incidents between vehicular traffic on the Dalton and hunters in highway vehicles, particularly archery hunters, are increasing. Without setbacks, like are in place for rifle hunters, archery hunters are more likely to park along the highway in unsafe ways to gain quick access to Caribou.

In addition to safety concerns, others expressed concerns about fair chase and the quality of the hunting experience when hunters are shadowing Caribou in their vehicle and then jumping out for a quick shot from a roadside ditch.

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

I talked with ADF&G biologists, DOT employees with oversight for the Dalton Highway, trucking companies using the Dalton Highway, and the Alaska State Troopers. I presented this proposal to the Fairbanks AC on 18 March 2026 and I subsequently amended the proposal based on the feedback I received at that meeting.

PROPOSED BY: Mark Lindberg (OI-F26-041)

Proposal 181

5 AAC 92.510. Areas closed to hunting.

Create a quarter mile set back in GMU 26B along the Dalton Highway right of way Boundary during the non-resident archery hunting season as follows:

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

Within Game Management Unit 26B, no person may release an arrow at any game animal, or position themselves to release an arrow at any game animal, *within one-quarter (1/4) mile of the Dalton Highway right-of-way boundary during the Non Resident season.*

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

Bow hunting is currently permitted to the Dalton Highway right-of-way in Unit 26B. The corridor sees daily heavy commercial traffic, and federal Executive Order 14153 has opened 2.1 million acres along the Dalton to expanded energy development, with a projected increase in truck traffic. Tourist use is also increasing annually.

Current regulations place active bow hunting and high-volume industrial and tourist traffic in the same narrow corridor simultaneously. This creates a public safety conflict and elevated wounding, as shots from the road do not allow for proper field assessment. A 1/4-mile setback establishes a clear, enforceable buffer between active hunting and road traffic. It reduces wounding, improves safety for all corridor users, and is specific, measurable, and enforceable by existing personnel with no additional staffing or infrastructure required. Increased industrial traffic under current federal development policy will intensify this conflict if no action is taken.

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

I worked with F&G and spoke to other truckers on the haul road to determine a potential solution to the problem at hand.

PROPOSED BY: James Haveron (OI-F26-107)

Proposal 182

5 AAC 92.530. Management areas.

Establish a Central Arctic Management Area (CAMA) within Game Management Unit 26B as follows:

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

SUMMARY OF PROPOSAL

This proposal would create a new regulatory management area within Game Management Unit 26B called the Central Arctic Management Area (CAMA) and place nonresident caribou hunters NOT using a registered guide, and NOT accompanied by a resident second-degree of kindred, ON A DRAW TAG ALLOCATION within both the Central Arctic Management Area (CAMA) and the Dalton Highway Corridor Management Area (DHCMA).

Under this proposal:

- Up to 100 total nonresident draw permits would be issued annually (DCXXX)
- Bag limit: 1 bull caribou
- Season: August 1 – September 15
- Hunt area: All lands encompassed by the DHCMA and the CAMA within 26B

This structure establishes a reasonable cap on nonresident participation in the most accessible portions of Unit 26B while maintaining nonresident opportunity. It is intended to reduce crowding, minimize user conflicts, and increase hunter satisfaction. Nonresident Caribou hunters would still be able to hunt caribou with a harvest ticket under state regulations in 26B remainder.

WHAT WOULD THE PROPOSAL DO?

This proposal would establish the Central Arctic Management Area (CAMA) within Game Management Unit 26B. The CAMA is specifically designed to encompass the river systems accessible from the Dalton Highway that are heavily relied upon by Alaska residents. These river corridors represent the only practical opportunity for residents to travel beyond the road system without the use of an aircraft and are critical travel routes for those attempting to meet subsistence needs.

These drainages have been extensively utilized by residents for generations and function as the primary access network in this region. It is important that all river systems that are potentially accessible by boat or airboat are included within the CAMA to ensure that nonresident hunting pressure does not simply shift into adjacent, unregulated areas.

The upstream navigability points identified in this proposal were intentionally selected as reasonable high-water limits of motorized access. This approach ensures that the regulatory boundary remains effective under varying conditions and prevents the displacement of hunting pressure into areas that could otherwise still be reached by boat during favorable conditions.

Area Description

- The CAMA would consist of river corridors accessible by jet boat or airboat from the Sagavanirktok River and its tributaries
- The CAMA would begin where the listed drainages exit the DHCMA and extend to the defined navigability points
- Boundaries would extend 5 miles outward from each bank of included rivers and tributaries
- This creates a 10-mile-wide corridor along these drainages outside the DHCMA

Upstream Navigability Points (CAMA Boundary Definition)

River / Tributary	Upstream Navigability Point (Lat/Long)	Notes
Sagavanirktok River	68°29'52.93"N, 149° 0'31.03"W	Upstream navigability point

River / Tributary	Upstream Navigability Point (Lat/Long)	Notes
Ribdon River	68°38'25.01"N, 148°15'59.93"W	Upstream navigability point
Lupine River	68°47'33.87"N 148° 6'36.78"W	Upstream navigability point
Ivishak River	69° 0'41.30"N 147°20'25.09"W	Upstream navigability point
Saviukviayak River	68°50'39.74"N, 147°58'20.32"W	Upstream navigability point
Echooka River	69°7'20.51"N, 147°3'31.65"W	Upstream navigability point
Sagavanirktok River (Downstream)	70°14'31.69"N, 147°50'0.22"W	Northern extent to Arctic Ocean. This would encompass the area accessible by boat outside of the Deadhorse closed area.

*These points represent the reasonable upstream extent of motorized boat access and define the upstream and downstream boundaries of the CAMA corridors. *

Boundary Integration

- Where CAMA overlaps with the DHCMA or other CAMA corridors, the areas would:
 - Merge and function as a single management area for nonresident draw permits
 - Retain existing regulations specific to each area
- Key distinction:
 - DHCMA: Bow-only restriction remains
 - CAMA: Standard weapon regulations apply

Nonresident Hunter Access Options

Successful permit holders may:

- Hunt along the Dalton Highway within the DHCMA, or
- Access river corridors within the CAMA using:
 - Transporter services
 - Boat rentals
 - Personal watercraft

This maintains flexibility for nonresident hunters while ensuring participation remains limited and predictable.

WHAT ARE THE BENEFITS OF THE PROPOSAL?

1. Addresses Increasing Nonresident Pressure

Preliminary Alaska Department of Fish and Game data shows nonresident hunting pressure in Unit 26B has steadily increased and has accounted for nearly 50% of total hunting pressure since 2021.

This increase is most evident in areas accessible by road and boat, where hunters are concentrated into relatively small portions of the unit.

Hunter Participation Trends by Access Type

Year	Nonresident (Boat/Airboat)	Nonresident (Highway Access)	Resident (Boat/Airboat)	Resident (Highway Access)
2021	131	202	66	353
2022	177	247	101	416
2023	266	331	180	529
2024	346	456	229	763
2025	295	448	N/A	N/A

Note: 2025 resident data was not available at the time of this proposal. ADF&G indicates participation is tracking within historical averages.

These trends clearly demonstrate the rapid increase in nonresident participation—particularly in the most accessible areas. Prior to 2021, available data consistently showed significantly more resident hunters than nonresident hunters utilizing boats and airboats for access. In recent years, this trend has shifted, reflecting a sharp increase in do-it-yourself (DIY) nonresident hunters, many of whom rely on transporter services. Highway-access participation by nonresidents has also increased substantially and is now approaching resident participation levels, which historically did not occur. As a result, many Alaska residents are beginning to abandon these areas and the associated subsistence opportunities due to increasing crowding and pressure from nonresident hunters.

Protects Resident Access to Critical Hunting Areas

The Dalton Highway and Sagavanirktok River system represent some of the most accessible caribou hunting opportunities in northern Alaska.

These areas are heavily relied upon by Alaska residents who:

- Do not have the ability to fly into remote areas
- Depend on these accessible corridors for food security

Unit 26B remains one of the few areas where residents can harvest caribou without:

- Drawing a permit
- Paying significant costs for fly-in access

Addresses the Importance of Accessible Caribou Hunting for Alaska Residents

Across Alaska, ungulate populations accessible from the road system or reachable by reasonable boat travel have declined and are struggling. As a result, the remaining accessible hunting opportunities are becoming increasingly important for resident hunters who rely on wild game to feed their families.

Unit 26B and the Central Arctic Caribou Herd (CACH) represent one of the few remaining opportunities for Alaska residents to harvest caribou without drawing a limited permit or paying extremely expensive transporter fly-in costs to access remote areas. Due to unlimited nonresident opportunity and growing demand, many air transporters now offer flat-rate drop hunts at premium prices rather than traditional hourly billing for flight time—a cost structure that the vast majority of Alaska residents cannot reasonably afford.

Because of this, Unit 26B is becoming an increasingly important food security resource for Alaska residents, particularly those who depend on accessible, lower-cost hunting opportunities to provide meat for their families.

Addresses the Effects of Unlimited Nonresident Opportunity and Hunter Density

Several factors are contributing to increasing pressure in Unit 26B:

- Unlimited nonresident hunting opportunity
- A liberal nonresident bag limit
- Increasing numbers of transporters, hunt planners, and other businesses catering to DIY nonresident hunters

These conditions have led to a substantial rise in nonresident participation, particularly in road- and boat-accessible areas where hunters are concentrated into relatively small portions of the unit.

When nonresident opportunity remains unlimited, it creates a feedback cycle in which increasing numbers of hunters attract additional transporters and commercial services, which in turn make these hunts even more accessible to additional nonresident hunters. As services expand and participation grows, hunting pressure can continue to increase year after year.

Over time, this dynamic accelerates hunting pressure and intensifies crowding in the most accessible portions of the unit. Without reasonable limits on participation, these trends will likely continue to worsen.

While the Central Arctic Caribou Herd may still support harvest biologically, excessive hunter density can significantly reduce hunt quality, hunter satisfaction, and opportunity for resident hunters.

High hunter density can result in:

- Reduced ability for hunters to locate animals
- Increased competition and crowding among hunters in accessible areas
- Greater likelihood of user conflicts

When participation levels become high enough that crowding and competition prevent many residents from having a quality hunt, it becomes appropriate to implement management tools that restore balance. This proposal directly addresses these issues by placing reasonable limits on the segment of hunters driving the majority of increased pressure.

Applies Proven Wildlife Management Principles

Across North America, wildlife managers recognize that hunter density—not just population levels—affects hunt quality and opportunity.

In highly accessible areas, limited entry systems are commonly used to:

- Maintain reasonable hunter density
- Preserve hunt quality
- Ensure fair distribution of opportunity

Applying this approach in Unit 26B aligns with widely accepted management practices.

Provides Proactive, Responsible Management

Recent surveys indicate the Central Arctic Caribou Herd has declined since its 2022 estimate of approximately 34,600 animals.

While the herd may still support additional bull caribou harvest, these trends support taking measured, proactive management steps. This proposal is not a reactionary restriction, but a forward-looking framework that helps ensure long-term sustainability and improve several issues such as overcrowding, declining hunter satisfaction, and declining hunt quality.

Establishes a Clear and Flexible Management Framework

Creating the CAMA provides:

- A clearly defined regulatory management area

- A framework for future adjustments if needed
- Improved ability for ADF&G and the Board of Game to manage pressure in accessible areas

While initially complex, this structure simplifies long-term management. The Alaska Department of Fish and Game GIS section would be responsible for developing the official regulatory boundaries for the CAMA. ADF&G GIS staff were contacted and provided an overview of the proposed area, and they indicated that mapping and implementing these boundaries is feasible and well within their capabilities.

Manages the Entire Accessible Landscape as One System

The Dalton Highway corridor and Sagavanirktok River system function as a single accessible hunting landscape.

Managing only one of these areas would likely shift pressure to the other, increasing crowding elsewhere.

This proposal manages both together to:

- Prevent displacement of pressure
- Maintain balance across the system

Maintains Opportunity While Establishing a Cap

This proposal does not eliminate nonresident hunting opportunity.

Instead, it:

- Maintains meaningful access for nonresidents
- Establishes a predictable cap on participation
- Balances nonresident hunting pressure in areas heavily utilized by residents

Maintains Appropriate Opportunity for Guided and Family-Based Hunting

This proposal intentionally allows nonresident caribou hunters who are using a registered guide, as well as nonresident hunters accompanied by a resident second-degree of kindred, to continue hunting within the CAMA and DHCMA with a harvest ticket.

Much of the land encompassed by the proposed CAMA falls within federal ANWR guide use areas ARC 09 and ARC 10, where guiding activity is already subject to strict federal oversight and limitations on the number of clients that can be taken annually. As a result, guided hunting activity in these areas is limited, regulated, and predictable, and is not a primary driver of increased hunting pressure or user conflicts.

Maintaining this opportunity ensures that existing guide operations can continue to operate within their authorized areas and continue to provide services to an already limited number of

clients without disruption. This is consistent with current land management frameworks and avoids unintended impacts to federally regulated guiding systems.

Similarly, nonresident hunters accompanied by a resident second-degree of kindred represent a very small and consistent portion of overall hunting pressure. These hunts are family-based, occur at a limited scale, and are not contributing to the increasing crowding and competition observed in accessible areas.

The primary source of increased pressure and conflict in Unit 26B is the rapid growth in do-it-yourself (DIY) nonresident hunting, particularly in areas accessible by road and boat. By focusing the draw permit structure specifically on this segment of hunters, the proposal directly addresses the root cause of user conflicts while avoiding unnecessary restrictions on guided and family-based hunting.

A similar management structure already exists in Southeast Alaska for black bear hunting in Game Management Units 1, 2, and 3. In those units, Alaska experienced a substantial increase in DIY nonresident hunters and transporter services, resulting in rapidly increasing hunting pressure. Land managers and regulatory agencies could not effectively regulate the expanding transporter sector, while guided hunting activity was already controlled through land manager permitting systems and resident and second-degree-of-kindred hunting was not identified as a driver of the problem.

In response, the Board of Game implemented a draw permit system specifically for nonresident hunters NOT using a registered guide and NOT accompanied by a resident second-degree of kindred. This approach allowed managers to place reasonable limits on the segment of hunters responsible for the rapid increase in participation while maintaining opportunity for guided hunters and traditional resident-family hunting arrangements. The same underlying conditions now exist in Unit 26B, and applying this proven structure follows an established and effective management approach already adopted by the Board of Game.

Outside of the ANWR guide use areas, there is currently little to none known guided hunting occurring on the state land within the DHCMA and proposed CAMA. While these lands are state-managed and guiding could potentially expand in the future, any such increase would be identifiable and addressable. By establishing the CAMA and associated regulatory framework now, the Board of Game would have a clear and effective mechanism already in place to implement additional management tools if guided pressure on state land within the DHCMA and CAMA were to emerge as a concern. This ensures that future issues could be addressed in a targeted and efficient manner without requiring a complete restructuring of regulations.

CONCLUSION

This proposal represents a balanced and practical approach to managing one of Alaska's most important and accessible caribou hunting areas.

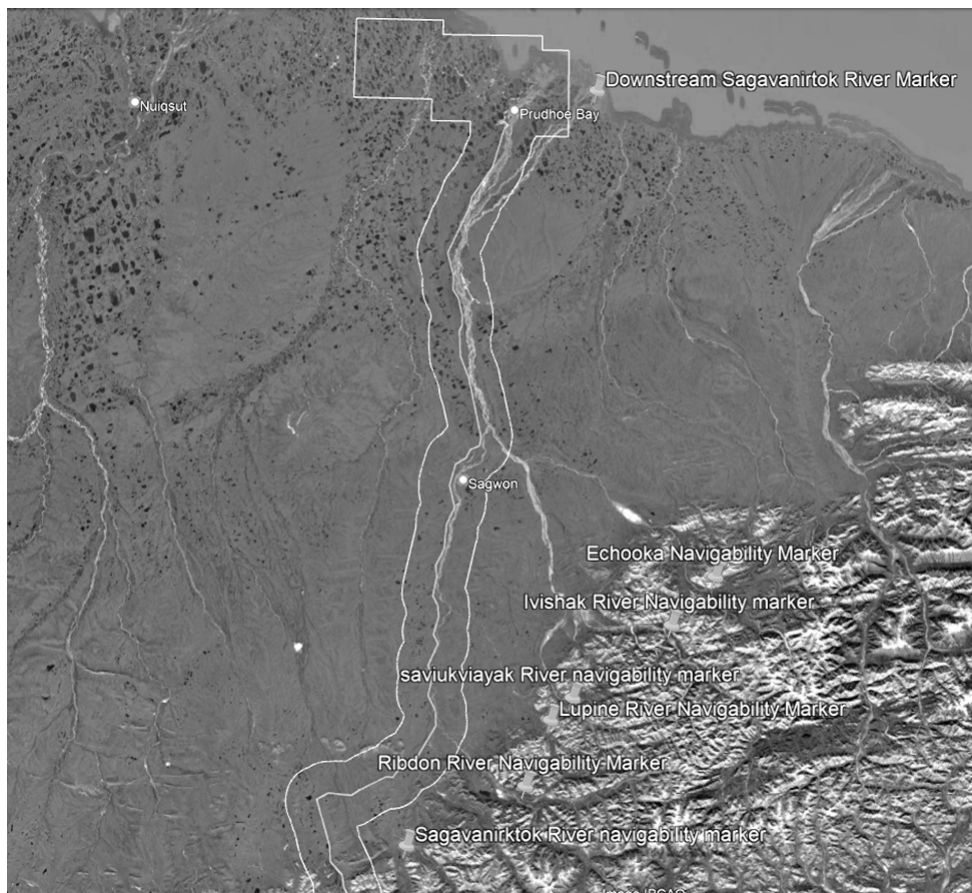
By creating the CAMA and placing nonresident hunting opportunity within the CAMA and DHCMA on a limited draw permit system, the Board of Game can:

- Reduce crowding and user conflicts
- Protect resident hunting opportunity
- Increase hunter satisfaction
- Ensure long-term usability of these areas

At the same time, nonresident hunters would continue to have fair and regulated access.

This approach ensures that Unit 26B remains a viable and accessible hunting opportunity for current and future generations of Alaskans.

PICTURE SHOWING DRAINAGES AND NAVIGABILITY POINTS



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

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

Overcrowding, user conflict, and decreasing hunter satisfaction in Unit 26b for caribou hunting

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

Yes this proposal was discussed with numerous other Alaska residents, hunting guides in 26B, and was supported unanimously by the Mat Su Valley AC.

PROPOSED BY: Grant Kopplin

(OI-F26-025)

Proposal 183

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

Change the resident spring moose season from “to be announced” to April 1–April 14 in Unit 26B excluding the Canning River drainage as follows:

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

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

(24)

...

Unit 26(B), excluding the
Canning River drainage

RESIDENT HUNTERS:

1 bull by drawing permit
only; up to 30 permits
may be issued

Sept. 1 – Sept. 14

1 bull; [DURING THE PERIOD
FEB. 15–APRIL 15, UP TO A
14 DAY SEASON MAY BE
ANNOUNCED BY EMERGENCY
ORDER]

Apr. 1 – Apr. 14
[(TO BE ANNOUNCED)]

...

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

The moose population has fluctuated between 100 and 600 moose in Unit 26B since the department began implementing regular surveys in 2003. This population has been growing, with the most recent population count at 390 moose in April 2024. When the population surpassed the management objective of 200 moose, harvest was reinstated in regulatory year 2022. Harvest during the spring hunt is rare but can be important for subsistence users. Formalizing this hunt period in regulation alleviates the need to issue an emergency order each year and allows the hunt dates to be printed in the regulation book. If the population drops below 200 moose, an emergency order would be issued to close the spring hunt and, if necessary, the fall drawing permit hunt would not be held.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-027)

Proposal 184

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

Require antler destruction upon taking of moose in tier II area as follows:

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

25D (Tier II area) Moose Hunt: Antler destruction upon taking animal, trophy value must be destroyed by sawing top half of one side of antler.

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

Low Moose Population. This proposal supports subsistence hunting, which is crucial for local food security. Moose hunting holds cultural importance for many communities and maintains traditional practices is vital for the cultural heritage.

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

I discussed proposal with some local hunters. They were all in agreement this a good proposal. I also tried working with local AC, but couldn't get a quorum together.

PROPOSED BY: Walter Peter

(OI-F26-130)

Proposal 185

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

Require antler destruction upon taking of moose in 25D remainder as follows:

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

25D Remainder Moose hunt: Antler Destruction, upon taking animal. Trophy value must be destroyed by sawing top half of one side antler.

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

Low Moose Pop. This proposal supports subsistence hunting, which is crucial for local food security. Moose hunting holds cultural Importance for many communities and maintaining Traditional Practices is vital for our Cultural Heritage.

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

Discussed with local hunters in my community. All were in Agreement this is a good proposal. I tried working with local A.C. but couldn't get a quorum together.

PROPOSED BY: Walter Peter

(OI-F26-134)

Proposal 186

5 AAC 85.020 (a)(24). Hunting seasons and bag limits for brown bear.

Eliminate the drawing permit for nonresident hunters in Unit26B for brown bears as follows:

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

Eliminate the drawing permit for nonresident hunters in Unit26B for brown bears.

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

(24)

...

Unit 26(B), that portion
within the Dalton Highway
Corridor Management Area

[RESIDENT HUNTERS:]

1 bear every regulatory
year by bow and arrow only;

Aug. 10–June 15

Aug. 10–June 15

[NONRESIDENT HUNTERS:

1 BEAR EVERY REGULATORY
YEAR BY DRAWING PERMIT
ONLY; BY BOW AND ARROW
ONLY; UP TO 20 PERMITS
MAY BE ISSUED IN COMBINATION
WITH THE REMAINDER OF 26(B)]

[AUG. 10–JUNE 15]

Remainder of Unit 26(B)

[RESIDENT HUNTERS:]

1 bear every regulatory year

Aug. 10–June 15

Aug. 10–June 15

[NONRESIDENT HUNTERS:

1 BEAR EVERY REGULATORY
YEAR BY DRAWING PERMIT
ONLY; BY BOW AND ARROW
ONLY; UP TO 20 PERMITS
MAY BE ISSUED IN COMBINATION
WITH THAT PORTION OF UNIT 26(B)
WITHIN THE DALTON HIGHWAY
CORRIDOR MANAGEMENT AREA]

[AUG. 10–JUNE 15]

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

The management objectives for brown bears in Unit 26B includes managing for a 3-year mean annual human-caused brown bear mortality of ≤ 27 bears ≥ 2 -years old of which no more than 12 are female.

Hunting pressure for brown bears in Unit 26B remains low. The 5-year (regulatory year (RY) 24-RY20) mean annual harvest from all hunts was 16 bears per year (range =12-23), of which an average of 4 per year were female (range= 2-8). For the past 5 years (RY24-RY20), an average of 7 nonresident hunters (range = 4-10) participated in the drawing harvest (DB987) with an average harvest of 4 bears per year. By removing the requirement for nonresidents to have a drawing permit, more nonresident hunter participation will be allowed to utilize the harvestable surplus.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-033)

Fairbanks Area - Units 20A, 20B, 20C, 20F, & 25C

Proposal 187

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

Increase youth hunting opportunities by allocating a portion (5%) of the any bull draw hunts and antlerless draw hunts in 20A as follows:

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

New hunt codes would be as follows

YM770, YM771, YM774, YM641, YM655, YM768, YM769, YM772, YM773, YM628, YM639, YM668, YM679. With season dates of 1 Sep- 30 Sep.

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

Increase youth hunting opportunities by allocating a portion (5%) of the any bull draw hunts and antlerless draw hunts in 20A.

Hunter recruitment is at an all-time low. We need to provide more youth only opportunities across the state. The proposed season dates are also more advantageous to youth hunters, possibly allowing them to have a better hunt experience.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-154)

Proposal 188

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

Nonresident permit allocation for draw permit hunt DM766 limited to “up to ten percent” as follows:

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

Nonresident permit allocation for draw permit hunt DM766 limited to “up to ten percent”

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

DM766 permit hunt is becoming more sought after. With this increased interest and a recent reduction in available permits we would ask that the Board limit nonresident permit allocation to allow resident hunters a better chance of receiving permits

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

Written by Middle Nenana River AC

PROPOSED BY: Middle Nenana River AC

(OI-F26-081)

Proposal 189

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM766, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM766, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM766.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-151)

Proposal 190

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20A as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area		
RESIDENT HUNTERS:		
...		
1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Last day of Feb.	
...		
1 moose by targeted permit only; by shotgun, crossbow, or bow and arrow	Season to be announced by emergency order (General hunt only)	

only; up to 100 permits may be issued

...

Remainder of Unit 20(A)

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25–last day of Feb.

...

1 moose by targeted permit only; by shotgun, crossbow, or bow and arrow only; up to 100 permits may be issued

Season to be announced by emergency order
(General hunt only)

...

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The primary goals of the Unit 20A antlerless hunts are to regulate moose population growth and herd

size within the intensive management (IM) population objective, at levels that the habitat can support, to provide harvest opportunity to help meet IM harvest objectives, and to provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios below objectives.

Unit 20A antlerless harvest is determined by a decision matrix that incorporates population status in relation to the IM population objective, nutritional status, and the population trend. The Unit 20A moose population is currently within the IM population objective and nutritional indices suggest the population is at moderate to high nutritional levels, but the population trend is uncertain. In November 2024, the Unit 20A population estimate was 11,696 moose (90% confidence interval 10,155–13,237 moose; 2.0–2.6 moose per square mile), which fell within the IM population objective of 10,000–15,000 moose and was similar to the previous estimated Unit 20A population size from fall 2022. Nutritional status is assessed primarily via twinning rates and short-yearling weights. The 3-year average twinning rate in western Unit 20A was 21%, 16% in central Unit 20A, and 32% in eastern Unit 20A. These twinning rates suggest moderate (10-20% twinning rates) to high (>20% twinning rates) nutritional status. Female short-yearling weights collected during 2023–2024 averaged 398 lbs, which is greater than the 385 lb threshold indicative of high nutrition in the decision matrix. The population trend since the November 2024 population survey is uncertain due primarily to the winter of 2025–2026, which appeared to negatively affect calf survival because of deep snow and persistent extreme cold. Due to this uncertainty in population trend data, no antlerless hunts in Unit 20A will be held in regulatory year 2026. Antlerless hunt plans for regulatory year 2027 will be reassessed following collection of additional data, including a planned population survey in the fall of 2026.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-014)

Proposal 191

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

Change the registration period and permit issuance in antlerless moose registration hunt RM768 to October 1-15, and change the season dates to October 15 – last day of February as follows:

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

In years that the antlerless moose registration hunt RM768 is opened, change the registration period and permit issuance to October 1-15, and change the season dates to October 15 – last day of February.

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

In years that the winter antlerless moose registration hunt RM768 is opened in Unit 20A Remainder, the registration period closes in August before the regular bull season begins. Because of this, local residents that may wish to participate in this hunt during times of food scarcity and/or when they are unable to harvest a bull moose during the regular season are unable to participate because they have missed the registration period. By shifting the

registration period and issuance of permits for RM768 to October, it would provide better opportunity for local residents to participate in the winter antlerless

moose hunt RM768.

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

Yes, this proposal was developed by the Minto Nenana Fish & Game Advisory Committee with assistance from ADFG staff.

PROPOSED BY: Minto/Nenana Fish & Game Advisory Committee (OI-F26-190)

Proposal 192

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

Maintain current antlerless hunt closures (2026) in 20A remainder as follows:

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

Maintain current antlerless hunt closures (2026) in 20A remainder. Maintain no open season for antlerless moose

by drawing permit hunt and by registration permit only as shown in 2025-2026 regulations. Reject any incoming proposals for 2027 that establish dates of Aug 15 - Nov 15 for antlerless moose by drawing permit hunt and dates of Aug 25-last day of Feb for registration permit only.

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

The Minto-Nenana AC has held a long standing position against antlerless hunts, and only supports taking of cows for ceremony. Some young moose harvested in the area have fully grown live tapeworms, which may indicate declining health. Local residents report fewer moose harvested for communities. The lower end of the confidence interval for the population estimate 10,155 is not very much above the lower end of the IM population objective of 10,000. With the hard winters and

continued climate uncertainty, precautionary management that eliminates antlerless hunts would better sustain population.

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

Yes, local ACs are concerned about low moose populations and moose health. Additionally, the winters of 2021 and 2025-2026 were extremely hard on moose, especially calves.

PROPOSED BY: Tlaa Deneldel Community Group (OI-F26-174)

**This Proposal was submitted with a map that can be found online at:*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Proposal 193

5 AAC 92.540. Controlled Use Areas.

Shorten the season dates for motorized restrictions in the Wood River CUA as follows:

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

We proposed to shorten the season dates for motorized restrictions in the Wood River CUA Wood River Controlled Use Area: Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the east bank of the Totatlanika River, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River, including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the drainages of the Healy Creek, Moody Creek, Montana Creek, and the Wood River; and bounded on the west by the east bank of the Nenana River from the divide separating the drainage of the Yanert River and Montana Creek north to Healy Creek, then easterly along the south bank of Healy Creek to the north fork of Healy Creek, then along the north fork of Healy Creek to its headwaters, then along a straight line to the headwaters of Dexter Creek, then along the east bank of Dexter Creek to the Totatlanika River, and then down the east bank of the Totatlanika River to the Rex Trail. The area is closed to the use of any motorized vehicle, except aircraft for big game hunting including the transportation of any big game hunters, their hunting gear, and/or parts of big game, **Aug 5 - Aug 25**; *however, this does not prohibit motorized access via, or transportation of game on, the Parks Highway or the transportation into the area of game meat that has been processed for human consumption.*

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

The issue is the overly restrictive motorized vehicle closure in the Wood River Controlled Use Area (WRCUA) in GMU 20A, which severely limits affordable resident access despite abundant game populations.

History of the WRCUA: This area was established decades ago as a tool to control ground-based access and prevent potential conflicts with guides during the fall season. The current rule (5 AAC 92.540) prohibits all motorized vehicles except aircraft from August 1–September 30 (with exceptions for the Parks Highway and processed meat). While the original intent was sustainable management, the aircraft-only exception has created de facto exclusivity for commercial air transporters and guides.

Current conditions and supporting data: The moose population in all of Unit 20A is extremely healthy and at one of the highest densities in North America. Recent geospatial population estimates (GSPE) and ADF&G surveys show stable numbers (e.g., eastern 20A estimates in the 2,700–4,000+ range in recent years), bull:cow ratios of 28:100 (2022), and calf:cow ratios of

33:100. Populations remained robust even after the tough 2021–2022 winter, with normal adult mortality. Caribou are also thriving and managed conservatively via the DC827 drawing hunt, which has high success rates among participants. Predator populations (wolves and bears) remain healthy and balanced.

Despite this abundance, participation is low due to access barriers. The DC827 caribou hunt has historically low entry rates because hunters cannot reach the area affordably without aircraft. This year alone, 34 cow moose hunts went undersubscribed largely because of access fears. General-season moose success rates hover at 22–26% (hundreds of hunters), while drawing hunts reach 41%—but many more Alaskans could hunt if ground access were allowed outside peak season. Antlerless permit uptake remains low (e.g., 2021: only 112 of 260 permits hunted, 41 cows harvested).

All safety nets remain firmly in place: strict antler restrictions (50-inch, 4 brow tines, or spike-fork), drawing permits that cap additional harvest, limited cow tags, and ongoing intensive-management monitoring. These ensure any increased access will stay well within sustainable levels.

Economic reality and lack of opportunity: The aircraft-only rule forces residents to rely on expensive air transporters. Typical costs run \$3,795 base per hunter for a moose drop camp plus \$1,200–\$1,500 for meat haul (total often \$4,000–\$6,000+ per person). This is prohibitive for most resident families, especially for cow hunts or caribou. Affordable ground access via the Rex Trail, Parks Highway, or existing trails (using personal ATVs, boats, or vehicles) would open real opportunity without commercial dependency.

The restrictions effectively prioritize guide exclusivity over resident needs. This is unfair to Alaskans, violates the principle of maximum sustained yield, and contradicts the Alaska Constitution’s mandate for sustained yield benefiting residents.

What happens if nothing changes? Resident participation stays artificially low, harvestable surplus goes unused (undersubscribed permits), and the area continues to function as a private playground for well-funded air-based hunters. Other solutions (e.g., past boundary adjustments proposed in 2023–2024 Board cycles) were

considered but rejected because they do not directly address the temporal restriction that creates the affordability barrier.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-169)

Proposal 194

5 AAC 92.530. Management areas.

Allow the take of waterfowl with the use of shotgun within the Healy Lignite Management Area as follows:

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

Healy Lignite Management Area- Open to hunting by bow and arrow only, small game **and waterfowl** may also be taken by falconry and shotgun.

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

We would like the Board to allow the take of waterfowl with the use of shotgun within the Healy Lignite Management Area. The Board recently changed regulation and allowed the take of small game by shotgun but failed to address the take of waterfowl.

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

Written by the Middle Nenana River AC

PROPOSED BY: Middle Nenana River AC

(OI-F26-079)

Proposal 195

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

Increase youth hunting opportunities by allocating a portion (10%) of the antlerless draw hunts in 20B FMA as follows:

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

New hunt codes would be as follows YMXXX season dates Sept 1-Nov 27

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

Increase youth hunting opportunities by allocating a portion (10%) of the antlerless draw hunts in 20B FMA.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee

(OI-F26-156)

Proposal 196

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM786, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM786, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM786.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is an Antlerless Moose hunt.

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

No

PROPOSED BY: Craig Van Arsdale

(OI-F26-158)

Proposal 197

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM788, to “Up To” 10% of the available permits as follows:

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

Limit the Non-Resident permit allocation for the Unit 20 Moose drawing hunt DM788, to “Up To” 10% of the available permits. If at least 10 permits are not available a Non-Resident permit will not be available.

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

Limit the number of tags that may be drawn by Non-Residents for Moose drawing hunt DM788.

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

Non-Residents are drawing a consistently high proportion of the tags for high demand drawing hunts. Moose hunting in Alaska is the only state in the Union that has opportunity to hunt Alaska-Yukon Moose unguided as a US Citizen, making it a highly desirable opportunity. Both Residents and Non-Residents compete for the tags equally in the Big Game Drawing which means Alaska Residents receive no preference in the drawing. Additionally this is an Antlerless Moose hunt.

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

No

PROPOSED BY: Craig Van Arsdale (OI-F26-160)

Proposal 198

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

Change the dates of the non-resident hunt within the Minto Flats Management area to September 8-25 in 20B and September 5-15 in 20B remainder as follows:

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

Change the dates of the non-resident hunt: in 20 B within the Minto Flats Management Area as follows:

no open season [SEPT 8 - SEPT 25]; and in 20B remainder as follows: **no open season** [SEPT 5 - 15].

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

The most recent surveys show continued low moose numbers after 2021, the rough winter that contributed to a 35% decline in Unit 20B bringing it below the IM population objective.

Additionally, some young moose harvested in the area have fully grown live tapeworms. Local residents report fewer moose harvested for communities which data shows too.

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

Yes, locals are meeting and concerned about low moose populations and moose health. Additionally, the winter of 2025-2026 was extremely hard on moose, especially calves.

PROPOSED BY: Tlaa Deneldel Community Group (OI-F26-176)

Proposal 199

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

Close a portion of western Unit 20B to nonresident moose hunters as follows:

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

Close the portion of Unit 20(B) outside the Fairbanks Nonsubsistence Area and outside the Minto Flats Management Area to nonresident moose hunters. In regulation, this area could be described as that portion of Unit 20(B) west of a line beginning at the Unit 20(A) / Unit 20(B) boundary at 64° 38.423 N. lat., 148° 38.921 W. long., north to 65° 12.586 N. lat., 148° 38.921 W. long., and that portion north of the line from 65° 12.586 N. lat., 148° 38.921 W. long., to the Unit 20(B) / Unit 25(C) boundary at 65° 12.586 N. lat., 148° 1.544 W. long.

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

The portion of Unit 20B outside the Fairbanks Nonsubsistence Area (FNSA) is split into 2 areas in 5 AAC 99.025 for moose, each with a positive customary and traditional use finding. The first area is that portion within the Minto Flats Management Area (MFMA), which has an amount reasonably necessary for subsistence uses (ANS) of 20–40 moose. The second area is that portion outside of the MFMA; this area has an ANS of 75–100 moose. The moose population within this second portion of Unit 20B decreased by approximately 48% between fall 2020 when the department estimated it at 2,386 moose (90% confidence interval 1,841–2,391) and 2023 when the department estimated it at 1,239 moose (90% confidence interval 827–1,651). This decrease was likely mostly due to the hard winter during 2021–2022. Following this decline, harvestable surplus (4% of the midpoint population estimate) was estimated at 50 bulls, which is below the ANS of 75–100 moose.

5 AAC 99.025 (c)(1) states that ANS includes the total amount of animals from a population that must be available for subsistence hunting in order to provide a reasonable opportunity for subsistence users hunting under State and Federal subsistence regulations. Furthermore, Alaska Statute 16.05.258(b)(4) states that if the harvestable portion of a population is not sufficient to provide a reasonable opportunity for subsistence uses, the appropriate board shall adopt regulations eliminating consumptive uses, other than subsistence uses. Therefore, since the estimated harvestable surplus is below the ANS in this portion of Unit 20B, and thus reasonable opportunity for subsistence uses is not being provided, eliminating nonresident moose hunting opportunity must be considered by the Board of Game since nonresident moose hunters are not subsistence users.

Moose management, as it relates to the ANS determinations, is complicated in western Unit 20B because the portion of Unit 20B outside the FNSA and outside the MFMA surrounds the MFMA

and is discontinuous in area. This regulatory structure (separate ANS determinations for each area) does not reflect the biological reality that moose from the same population move in and out of the MFMA and therefore between the areas with separate ANSs. In addition, because the area outside the MFMA does not follow drainages and includes disconnected polygons, hunting regulations created specific to this area are likely to be challenging to implement and for hunters to interpret.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-037)

Proposal 200

5 AAC 85.045(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20B as follows:

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

Units and Bag Limits (18)	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
...		
Unit 20(B), that portion within Creamer's refuge		
...		
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27 (General hunt only)	Sept. 1–Nov. 27

Units and Bag Limits

1 antlerless moose by muzzleloader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area

Unit 20(B), remainder of the Fairbanks Management Area

...

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

1 moose by targeted permit only; up to 100 permits may be issued

Unit 20(B), that portion within the Minto Flats Management Area

RESIDENT HUNTERS:

...

1 antlerless moose by registration permit only

...

**Resident
Open Season
Subsistence and General
Hunts**

Dec. 1–Jan. 31
(General hunt only)

**Nonresident
Open Season**

No open season.

Sept. 1–Nov. 27
(General hunt only)

Sept. 1–Nov. 27

Season to be announced
by emergency order
(General hunt only)

No open season.

Oct. 15–Feb. 28
(Subsistence hunt only)

Units and Bag Limits

Unit 20(B), the drainage of the Middle Fork of the Chena River

**Resident
Open Season
Subsistence and General
Hunts****Nonresident
Open Season****RESIDENT HUNTERS:**

1 antlerless moose by drawing permit only; up to 300 permits may be issued; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Oct. 1–Last day of Feb.
(General hunt only)

No open season.

...

Unit 20(B), that portion southeast of the Moose Creek dike within one-half mile of each side of the Richardson highway

RESIDENT HUNTERS:

...

1 moose by drawing permit only; by crossbow, bow and arrow, or muzzleloader only; up to 100 permits may be issued; or

Sept. 16–Last day of Feb.
(General hunt only)

1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued

Season to be announced
by emergency order

Remainder of Unit 20(B)

RESIDENT HUNTERS:

Units and Bag Limits	Resident Open Season Subsistence and General Hunts	Nonresident Open Season
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14 (General hunt only)	
...		
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1– Last day of Feb.	
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order (General hunt only)	No open season.
...		

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

Antlerless moose hunting seasons must be reauthorized annually by the Board of Game. The primary goals of the Unit 20B antlerless hunts are to regulate moose population growth and size within the intensive management (IM) population objective, at levels that the habitat can support, to provide harvest opportunity to help meet IM harvest objectives, to provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios below objectives, and to reduce moose-vehicle collisions and nuisance moose issues.

The most recent unit-wide Unit 20B moose population estimate was below the IM population objective and thus there are currently few antlerless hunts offered within the unit. In November 2023, the Unit 20B moose population estimate was 7,848 moose (90% confidence interval 6,613–9,083 moose; 0.7–1.0 moose per square mile), which fell below the IM population objective of 12,000–15,000. This estimate was a decrease from the previous unit-wide survey in fall 2020, when the population estimate was 12,480 moose. The department surveyed the eastern and central portion of Unit 20B in fall 2025, and the results of this survey

suggest the moose population was stable within this portion of the unit between 2023 and 2025. The primary cause for the decline between 2020 and 2023 was likely the difficult winter of 2021–2022, which was a prolonged winter with deep snow and icing events that negatively impacted moose populations throughout the interior. Following the winter of 2021–2022, no antlerless hunts have been offered in Unit 20B except for within the Fairbanks Management Area (FMA) and within the Richardson Highway corridor. The primary purposes of the FMA and Richardson Highway corridor hunts are to reduce vehicle-moose collisions, and for the FMA, to reduce nuisance moose issues.

The only antlerless hunts planned for Unit 20B for regulatory year 2026 are within the FMA and Richardson Highway corridor. Furthermore, the targeted hunt for any moose may be used to address public safety or nuisance moose issues. The department will base antlerless hunt plans for regulatory year 2027 and beyond on the results of the planned western Unit 20B moose population survey in fall 2026 as well as ongoing monitoring of nutritional indices. No additional antlerless hunts beyond the FMA, Richardson Highway corridor, and targeted hunts will be held in the near future unless the unit-wide population increases to within the IM population objective, nutritional condition declines, or there is an identified harvest surplus within a portion of the unit due to an increased population.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-015)

Proposal 201

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

Create a new muzzleloader hunt in a portion of unit 20C as follows:

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

We would like to see the hunt structure modeled after the existing DM766 hunt. Season dates from Nov1-Dec15. Bag limit 1 bull for resident hunters and 1 bull with antlers 50" or greater or 4 or more brow tines on one side for non-resident hunters. We would ask up to 50 permits be made available. We would also like the Board to consider restricting non-resident hunters' permit allocation of no more than ten percent of permits issued, using the language of "up to 10% non-resident allocation".

The proposed hunt area would be as follows. That portion of unit 20C bounded on the East by the East bank of the Kantishna river to its confluence with the Toklat river, following the east bank of the Toklat river which is North of DNP&P. Bounded on the North by the North bank of the Tanana river. Bounded on the West by the 20C boundary to the point of the boundary directly west of the North West corner of Denali Preserve then following a straight line to the Preserve boundary. Bounded on the South by the northern boundary of DNP&P.

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

We would like the Board to consider creating a new muzzleloader hunt in a portion of unit 20C. A growing number of hunters are participating in the current DM766 muzzleloader permit hunt. Creating this would open up additional opportunity for a late season hunt in an area that receives very little hunting pressure during general season due to limited access.

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

Written by the Middle Nenana River AC

PROPOSED BY: Middle Nenana River AC (OI-F26-080)

Proposal 202

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

Improve youth hunting opportunities by changing the youth hunt in 20C RM781, 25 Aug- 31 Aug, to a draw hunt with new dates as follows:

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

New draw hunt YMXXX (up to 10 permits, resident only) season dates 26 Sep- 30 Sep. Harvest has been on average one bull during the previous 5 youth seasons. Speaking to the area biologist there is enough surplus to allow a later season hunt that would allow more success for youth hunters. The dates a draw selection were chosen to avoid conflict with local hunters.

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

Improve youth hunting opportunities by changing the youth hunt in 20C RM781, 25 Aug- 31 Aug, to a draw hunt with new dates.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-157)

Proposal 203

5 AAC 92.220. Salvage of game meat, furs, and hides.

Require Bone-In Transport of Moose Meat in the Lake Minchumina Area of Unit 20C as follows:

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

PROPOSED REGULATION

The Lake Minchumina area of GMU 20C, as defined by all Lake Minchumina watersheds draining into the Muddy River and Birch Creek as far as the Kantishna, the meat of a harvested moose must remain naturally attached to the bone on the front and rear quarters as well as the ribs until removed from the field or transported to the location where it will be processed.

WHAT WILL HAPPEN IF NOTHING IS DONE

Field deboning may continue to contribute to wanton waste and complicate enforcement.

BENEFITS

Ensures full salvage of edible meat. Aligns with regulations used in other Alaska units. Simplifies enforcement of wanton waste laws.

COSTS

Slightly heavier pack loads for hunters

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

Require Bone-In Transport of Moose Meat in the Lake Minchumina Area of Unit 20C PROBLEM

Deboning moose meat in the field increases the risk of wanton waste and makes enforcement difficult. With the rising number of hunters entering Unit 20C—the risk of improper salvage increases.

In remote areas such as the Lake Minchumina region, difficult terrain and transportation logistics can lead to meat being left behind when animals are deboned in the field.

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

Yes, this proposal was developed by the Lake Minchumina Fish & Game Advisory Committee

PROPOSED BY: Lake Minchumina Fish & Game Advisory Committee (OI-F26-181)

Proposal 204

5 AAC 85.045; 92.050. Hunting seasons and bag limits for moose; Required permit hunt conditions and procedures.

Create a limited draw Moose hunt for nonresidents in the Lake Minchumina area of GMU 20C as follows:

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

The Lake Minchumina area of GMU 20C, as defined by all Lake Minchumina watersheds draining into the Muddy River and Birch Creek as far as the Kantishna, shall have a limited permit drawing for Moose hunting once per year for non-Alaskan residents. The initial drawing will take place in the Lake Minchumina Community Building during the first week of June and consist initially of three permits awarded. Permits shall be awarded only to those participants physically present during the drawing.

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

Increased hunting pressure in the Lake Minchumina Area of GMU 20C has led to a lack of sufficient local moose numbers.

Although GMU 20C encompasses a vast area of the Alaskan Interior, Lake Minchumina lies along the extreme western rim of GMU20C. As such we have a limited watershed upon which to effectively hunt. Our principally accessible hunting area is the Lake Minchumina out flow Muddy River sometimes down to its confluence with Birch Creek and the Mckinley Fork of the Kantishna. Our accessible hunting portion of GMU 20C has rarely received any moose number attention other than hunter tag data. Yet, we are a community wholly dependent upon this valuable resource. To put matters in perspective: of the 13 moose harvested locally last fall only three remained for community consumption, the rest of them left with the hunters.

What would happen if nothing is changed?

A high volume hunting /transporting /guide operation simply does not bode well for our vulnerable, moose dependent, community of Lake Minchumina. We seek to mitigate, at least to a degree the impact of high volume operations upon this community.

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

Yes, this proposal was developed by the Lake Minchumina Fish & Game Advisory Committee

PROPOSED BY: Lake Minchumina Fish & Game Advisory Committee (OI-F26-182)

Proposal 205

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

Change the dates of the non-resident moose hunt in 20C to September 1 - 25 as follows:

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

Change the dates of the non-resident hunt in 20C as follows: **Sept 5** [SEPT 1] to **Sept 15** [SEPT 25].

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

20 C is a low density moose area and a full survey has not been completed since 2011. With the new road, agriculture developments, and private land sales, fewer local residents are reporting successful hunts. Additionally, some young moose harvested in the area have fully grown live tapeworms.

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

Yes, locals are meeting and concerned about low moose populations and moose health. Additionally, the winter of 2025-2026 was extremely hard on moose, especially calves.

PROPOSED BY: Tlaa Deneldel Community Group (OI-F26-179)

Proposal 206

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

Change bag limit and special instructions for RM 781 to one bull with spike fork antlers, 50 inch antlers, or 4 or more brow tines on at least one side as follows:

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

Change the bag limit and special instructions for permit hunt RM781 to read: One bull with spike-fork antlers or 50-inch antlers or 4 or more brow tines on at least one side by permit available online at hunt.alaska.gov or in person in Fairbanks, Delta Junction, Tok, Minto, Tanana, Nenana or Central beginning July 1

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

In Unit 20C the bag limit and special instructions for hunt permit RM781 for resident hunters is stated as One bull by permit available online at hunt.alaska.gov or in person in Fairbanks, Delta Junction, Tok, Minto, Tanana, Nenana, and Central beginning Jul1. This is putting strain on Moose Population in Unit 20C.

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

Developed in coordination with local hunters in the Healy Unit 20C area after observing a noticeable drop in bull moose population in Unit 20C over the last several years.

PROPOSED BY: Howard Walters

(OI-F26-042)

Proposal 207

5 AAC 92.540. Controlled Use Areas.

The Lake Minchumina area of GMU 20C shall have hunting access limited to surface use watercraft transport as follows:

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

The Lake Minchumina area of GMU 20C, as defined by all Lake Minchumina watersheds draining into the Muddy River and Birch Creek as far as the Kantishna, shall have hunting access limited to surface use watercraft transport. Float plane access is limited during the moose hunting season to and from only Lake Minchumina and Wien Lake. All other lakes of the Lake Minchumina/Muddy River/Birch Creek watershed shall be limited to surface access means during the scheduled moose season in GMU 20C.

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

Increased hunting pressure in the Lake Minchumina Area of GMU 20C has led to a lack of sufficient moose numbers harvestable by local community residents, a trend increasing with a recent development.

Lake Minchumina is easily accessed by Wright Air Service with two to three times per week mail, passenger and freight service. Although GMU 20C is a vast area of the Alaskan Interior, Lake Minchumina lies on the western rim of GMU20C. We have a limited watershed area upon which to hunt. Of 13 moose harvested locally last fall only three remained for community use.

Alaska Mental Health Trust's (AMHT) award of a multi-year permit for Willow Air Guide & Transporter exclusive access and use of AMHT's lands on the surrounding area of Lake Minchumina is impactful. Willow Air's reputation is a "high volume" hunter transporter guide and warrants concern of commercial moose hunting pressure in the Lake Minchumina area. We have seen increased float plane camps on lakes in the Minchumina area.

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

The Lake Minchumina Fish and Game Advisory Committee, on the recent meeting of April 25, 2026 was not able to discuss and debate the merits of this proposal. Nonetheless, some

Minchumina Community members thought it did merit consideration by the Alaska Board of Game and as such is now submitted to the Board of Game by the May 1, 2026 deadline.

PROPOSED BY: Walter Maakestad

(OI-F26-078)

**A map was included with this proposal submission and can be found online at*

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Proposal 208

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

Remove the winter moose hunting season from regulations in GMU 20F as follows:

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

Remove the winter moose hunting season from regulations in GMU 20F as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose

Unit 20(F), that portion drained by the Yukon River downstream from, but not including, the Hess Creek and Tanana River drainages

1 bull by registration permit only Sept. 5 - Sept. 25

[DEC. 1 - DEC. 15]

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

Moose numbers in Unit 20F have declined to a point where having a winter hunt can no longer be justified. The winter season is for bulls only, but there have been observations of illegal cow harvest during the winter season. The area is accessible by winter road and snowmachine from the Elliot Highway and gets too much pressure. Cows are hauled out in the dark during winter. This area used to have a nice little herd of cows that hung out in the wintertime, but they are gone.

Moose population surveys have never been conducted in this area. Residents of Rampart have reported seeing less moose in recent years and it is taking more time and effort to harvest moose. The Eastern Interior Regional Advisory Council (EIRAC) has requested surveys of the 20F moose population for years through letters and their Annual Reports, but neither State nor Federal managers have been able to prioritize them to date.

Based on these reasons, management needs to be more conservative and reduce harvest opportunity by closing the winter season.

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

This proposal was discussed and developed in a public meeting. The EIRAC Chair serves on the Tanana-Rampart-Manley Advisory Committee as the Vice Chair.

PROPOSED BY: Eastern Interior Subsistence Regional Advisory Council (EIRAC) (OI-F26-116)

Proposal 209

5 AAC 99.025. Customary and traditional uses of game populations.

Re-evaluate the ANS for 20F and 20C and create a separate ANS for each subunit to be able to more accurately evaluate whether ANS is being met in 20F as follows:

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

Re-evaluate the ANS for these units and create a separate ANS for each subunit to be able to more accurately evaluate whether ANS is being met in 20F.

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

Residents of Tanana and Rampart report not meeting their subsistence needs for moose in recent years. They have observed a decline in numbers of moose and are increasingly putting in more effort to try to harvest them.

Currently the ANS for moose is combined for Units 20F and 20C and is 100-130 moose. These two areas are vast and the subsistence use patterns and access are highly varied between these two units.

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

Yes, this proposal was developed by the Tanana-Rampart-Manley Advisory Committee.

PROPOSED BY: Tanana/Rampart/Manley Fish & Game Advisory Committee (OI-F26-191)

Proposal 210

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

Change the winter moose hunting season in GMU 20F to a Tier II hunt as follows:

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

Change the winter moose hunting season in GMU 20F to a Tier II hunt For Change the Dec 1 - Dec 15 hunt to a tier II hunt.

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

By default, all 20F moose hunts are essentially Tier I hunts already, as there are no non-resident opportunities.

Tanana and Rampart community members have had a difficult time harvesting moose in the fall season and have seen the population decline drastically for some time now. While the 2025 unit-wide harvest of only 12 bulls (local and non-local success combined) may appear to be an anomaly, it is a realistic reflection of the dwindling success local hunters from these communities have faced in recent years.

Given the ongoing decline in salmon populations, the residents of Tanana and Rampart can no longer afford to wait for official Department trend data to catch up with their direct, on-the-ground observations of depressed moose numbers.

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

Yes, this proposal was developed in conversation with the Tanana-Rampart-Manley Advisory Committee and Department staff.

PROPOSED BY: Janessa Newman (OI-F26-205)

Proposal 211

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

Change hunting season for moose in 25C to start one week later than it currently does, for the same number of days that are allowed now as follows:

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

My husband and I would like to suggest the hunting season for moose in 25C be changed to start one week later than it currently does, for the same number of days that are allowed now. It seems over the last 25 plus years we've been hunting the area, the seasons have changed and the moose are not active until later in September. This change wouldn't necessarily need to be applied to non-residence hunters, but it would be nice for us resident hunters. Thank you for your considerations

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

Our issue is the lack of moose, which we and many others believe to be tied into the milder climate. The leaves are dropping later and later in the fall and the moose just are not as active as they used to be during the current hunting dates for Unit 25C.

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

This is a suggestion based on our personal experience and the many, many comments of other hunters who believe the climate is affecting the hunting season for moose.

PROPOSED BY: Renee Dick

(OI-F26-070)

Proposal 212

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

Change the bag limit in RM 781 and RM 749 registration moose hunts to: One bull with 50" antlers or antlers with 3 or more brow tines on at least one side as follows:

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

Change the bag limit on all the above nonresident registration moose hunts to:

One bull with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** within Creamer's Field Migratory Waterfowl Refuge Sept 1 – Sept 30 and Nov 21 – Nov 27

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** Remainder of Fairbanks Management Area Sept 1 – Sept 30 and Nov 21 – Nov 27

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** drainage of the middle (East) fork of the Chena River Sept 26 – Sept 30

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20B RM 781 **Nonresident** Salcha River drainage upstream from and including Goose Creek Sept 26 – Sept 30

One bull by bow & arrow only with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20D RM 749 **Nonresident** within the Healy River drainage Sept 1 – Sept 20

One bull with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20D RM 749 **Nonresident** north of the north bank of the Tanana River including the Volkmar River drainage, east to include the Billy Creek drainage, including the Healy River drainage Sept 1 – Sept 20

One bull with 50" antlers or antlers with 3 or more brow tines on at least one side

Unit 20D Remainder RM 749 **Nonresident** Sept 1 – Sept 15

One bull with 50” antlers or antlers with 3 or more brow tines on at least one side

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

Nonresident Registration Any-Bull or Antlered-Bull Moose Hunts

The opportunity to take a bull moose without antler restrictions should be reserved for residents only as it is a meat hunt that provides special opportunity for resident moose hunters to fill their freezer.

Resident hunters continually ask for more any-bull moose hunts as it is so much more likely to be able to harvest a moose without antler restrictions. But they are told by the Department that only so many any-bull hunts can be offered. With such limited any-bull over-the-counter moose hunts available, it makes no sense to allow nonresidents to have that same bag limit. An archery only hunt or weapons restriction hunt is not a reason to allow an any-bull bag limit.

We don't want to eliminate nonresident over-the-counter moose hunting opportunity in Unit 20, however we do want there to be antler restrictions for all nonresident moose hunts.

There are several nonresident registration moose hunts in Unit 20 that have a bag limit of any-bull or antlered bull, listed below.

Unit 20 Nonresident Registration Moose Hunts with Any-Bull or Antlered Bull Bag Limit

Unit 20B RM 781 within Creamer's Field Migratory Waterfowl Refuge

Sept 1 – Sept 30 and Nov 21 – Nov 27 **One bull with spike fork antlers or greater by bow & arrow only**

Unit 20B Remainder of Fairbanks Management Area

Sept 1 – Sept 30 and Nov 21 – Nov 27 **One bull with spike fork antlers or greater by bow & arrow only**

Unit 20B RM 781 drainage of the middle (East) fork of the Chena River Sept 26 – Sept 30 **One bull by bow & arrow only**

Unit 20B RM 781 Salcha River drainage upstream from and including Goose Creek Sept 26 – Sept 30 **One bull by bow & arrow only**

Unit 20D RM 749 within the Healy River drainage Sept 1 – Sept 20 **One bull**

Unit 20D RM 749 north of the north bank of the Tanana River including the Volkmar River drainage, east to include the Billy Creek drainage, including the Healy River drainage Sept 1 – Sept 20

One bull

Unit 20D Remainder RM 749 Sept 1 – Sept 15 **One bull**

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

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-095)

Proposal 213

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

Open a resident-only spring brown bear season extension in Unit 20A and 20B Remainder as follows:

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

We propose a resident-only spring brown bear season extension in Unit 20A and 20B Remainder Residents: One bear every regulatory year Sept 1-June 30

The nonresident season and bag limit would remain the same and close on June 15.

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

EXTEND BROWN BEAR SEASON TO JUNE 30 FOR RESIDENTS ONLY

The current grizzly bear hunting season in Units 20A and 20B (remainder) closes on June 15, while legal black bear baiting stations remain active and permitted through June 30. This 15-day gap unnecessarily limits resident hunting opportunity during the late-spring period when bears are active at baits.

Grizzly bear populations in these units are healthy and stable. ADF&G has recently liberalized seasons in this area (most recently extending the close from May 31 to June 15) with no conservation concerns. Harvest levels remain low and well within sustainable limits: for example, recent data show only ~31 brown bears harvested annually across the large, combined area of Units 20A, 20B, 20C, 20F, and 25C (55% males), and historical harvests in 20A/20B alone have averaged 10–18 bears per year. Interior Alaska brown bear densities are low to moderate (10–25 bears per 1,000 mi² in similar habitat), and sustainable harvest rates are 5–6% of the population—current take is far below that threshold.

If nothing changes, resident hunters lose the final two weeks of baiting opportunity each year, reducing both recreational and subsistence harvest potential with zero biological benefit. Other solutions considered (e.g., no change or a full year-round season) were rejected because this targeted 15-day extension perfectly aligns hunting with existing baiting rules while maintaining the conservative one-bear bag limit and fall/spring structure.

We did not want to include nonresidents in this season extension due to potential conflicts with guided nonresidents and increased baiting activity by guides who are allowed up to 10 bait stations in each guide use area.

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

Yes, the Fairbanks AC developed this proposal.

20A Sheep (GS000) Resident Stats RY21-25						
	2021	2022	2023	2024	2025*	Avg
Hunted	135	96	111	136	124	120
Harvested	18	12	20	21	19	18
% Success	13%	13%	18%	15%	15%	15%

*Preliminary data

20A Sheep (GS000) Nonresident Stats RY21-25						
	2021	2022	2023	2024	2025*	Avg
Hunted	47	47	40	49	51	47
Harvested	26	24	20	24	35	26
% Success	55%	51%	50%	49%	69%	55%

*Preliminary data

PROPOSED BY: Fairbanks Fish & Game Advisory Committee

(OI-F26-163)

Proposal 214

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit nonresident sheep hunting opportunity in Unit 20A as follows:

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

Limit nonresident sheep hunting opportunity in Unit 20A.

Unit 20A Sheep

Nonresident Aug 10 – Sept 20

One ram with full-curl horn or larger every four regulatory years by draw permit DSXXX Up-to 20 permits may be issued

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

Sheep Declines in Unit 20A, Unlimited Nonresident Opportunity, Crowding & Conflicts

Continued unlimited nonresident sheep hunting opportunity in Unit 20A during a significant sheep decline is unwarranted, even if it poses no sheep conservation concerns under full-curl management.

Unlimited nonresident sheep hunting opportunity in Unit 20A combined with no limits on the guides nonresident sheep hunters are required to hire isn't good for anyone and with fewer legal rams on the landscape it exacerbates the conflicts.

Nonresident sheep hunters in Unit 20A harvested 57 percent of the sheep on average over the last five years: (ADFG charts)

20A Sheep (GS000) Harvest by Residency RY21-25						
	2021	2022	2023	2024	2025*	Avg
Resident	18	12	20	21	19	18
Nonres	26	24	20	24	35	26
% Nonres	59%	67%	50%	53%	58%	57%

*2*Preliminary data. Note for RY25, the resident and nonresident harvest does not add up to the total harvest for the area. This is due to several harvest tickets with no residency information included.*

Nonresident guided sheep hunters make up 28% of all the sheep hunters on average over the last five years and have nearly four times the success rates as resident hunters:

The sheep population in Unit 20A has significantly declined, however there was a bright spot in the 2025 minimum count survey with a marked increase in the number of lambs, along with an overall increase in the population. Still, we are looking at a decades long period for sheep recovery if it does happen and sheep will remain at low numbers for the near future.

The board is on record stating that there are problems with unlimited nonresident sheep hunting opportunity combined with no limits on guides when sheep populations are this low. This is why the option the board chose to solve similar problems in Unit 19C was to implement a guide concession program to limit the number of guides and their clients. There may very well be proposals to implement such a program in Unit 20A before the board during this cycle.

But until there is a guide concession program in Unit 20A, with the current status of our sheep population we believe nonresident sheep hunters should be limited. And the only way we see to do that is via draw permits with a limited allocation. We recognize why a draw permit system is not preferred by the guides, but we do it in plenty of other units. Any new draw permit system would not take effect until the fall 2028 season.

With all due respect to the board, it's past time to act and limit nonresident sheep hunters in Unit 20A. We don't need it to be a draw for both residents and nonresidents; there is no reason we

can't just have a draw hunt for nonresidents while allowing over-the-counter resident sheep hunting opportunity at the same time.

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

Thanks to Department staff for the data and charts!

PROPOSED BY: Resident Hunters of Alaska

(OI-F26-094)

Proposal 215

5 AAC 84.270. Furbearer trapping.

State owned lands in the Stampede Road corridor should be closed to hunting and trapping of wolves, coyotes, wolverine, and lynx as follows:

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

State owned lands in the Stampede Road corridor should be closed to hunting and trapping of wolves, coyotes, wolverine, and lynx. These lands are referred to hereinafter as the "Stampede Road Townships." These lands are specifically described as follows:

(a) Unit 20(C), that portion west of a line beginning at 63° 48.146' N. lat., 148° 59.934' W. long., north to 63°49.445' N. lat., 148° 59.935' W. long., then west to 63° 49.445' N. lat., 149° 12.699' W. long., then north to 63° 54.642' N. lat., 149° 12.699' W. long., and bounded on the south, west, and north by Denali National Park.

A map depicting these lands is provided. The legal description and the map are taken from an emergency closure order issued by Commissioner Sam Cotton on April 2, 2018.

A regulation to implement this proposal should provide as follows:

5 AAC 84.180 Areas Closed to Hunting and Trapping. Hunting and trapping of wolves, coyotes, and wolverine, and lynx is closed in the area known as the Stampede Road Townships, which are described in subpart (a) of this regulation, as follows:

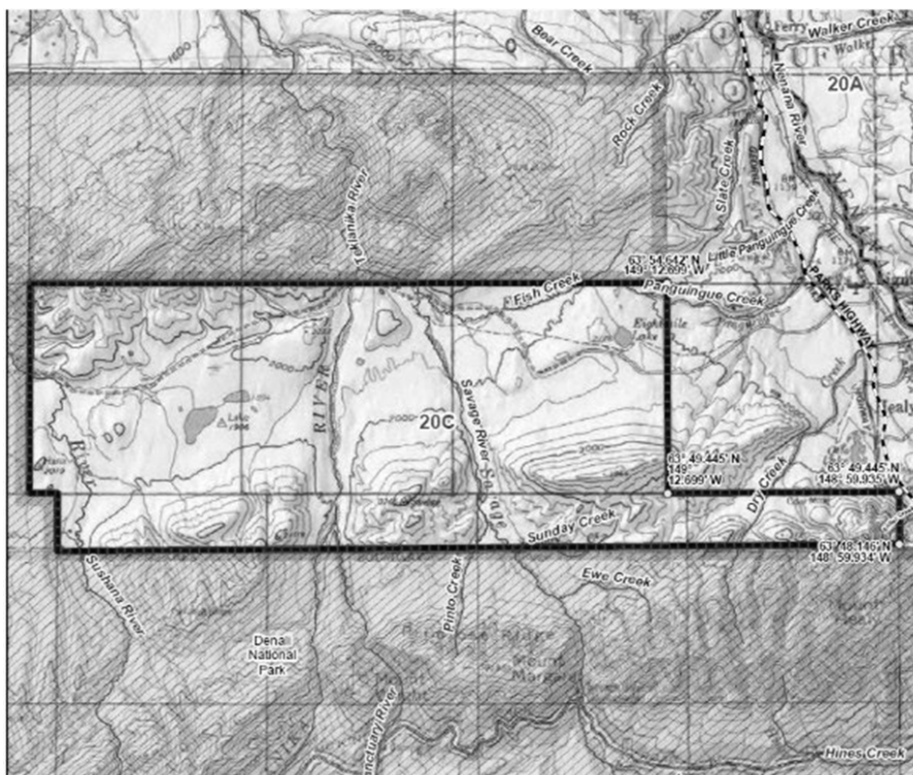
(a) Unit 20(C), that portion west of a line beginning at 63° 48.146' N. lat., 148° 59.934' W. long., north to 63°49.445' N. lat., 148° 59.935' W. long., then west to 63° 49.445' N. lat., 149° 12.699' W. long., then north to 63° 54.642' N. lat., 149° 12.699' W. long., and bounded on the south, west, and north by Denali National Park.

(b) Exceptions:

(1) Use of a firearm to kill one of the listed species in self defense, or in defense of private property, for instance companion animals, poultry or livestock, is not prohibited by this section.

(2) Lands owned by or administered by the National Park Service are excluded from areas to be closed by this section.

A map depicting the lands proposed to be closed is provided. Areas proposed to be closed are within the area outlined in red. Lands administered by the National Park Service are shown in blue.



Areas proposed to be closed are within the area outlined in red. Lands administered by the National Park Service are shown in blue. A color version of this map is available at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

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

As recently as 2010 part of the lands located in the Stampede Road Townships were closed to the hunting and trapping of wolves by regulation at 5 AAC 84.180. But the Board of Game subsequently repealed those closures, and at the current time there are no regulations providing for year round closures of these lands to the hunting and trapping of wolves, coyotes, wolverine, and lynx. Hunting and trapping of wolves, coyotes, wolverine, and lynx in the Stampede Road Townships negatively impacts the viewing of these species by Alaskans on wildlife viewing tours inside the Denali National Park. Wildlife viewing is a use of wildlife protected by Article VIII, Section 3 of the Alaska Constitution, This section is commonly referred to as “the Common Use Clause”. The fact that wildlife viewing is protected by the Common Use Clause was expressly found to be the law in Michelle Stone Bittner v. State of Alaska, et al, Case No. 3AN-23-07487 CI, where the Superior Court in a decision dated March 12, 2026, held at page 12 as follows:

"Article VIII provides that '[w]herever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.' The clause does not limit use to consumption or to consumptive users. As the United States Supreme Court has recognized, aesthetic and environmental well being - like economic well being - are essential components of the quality of life. Non-consumptive use advances those interests just as consumptive use advances economic ones. The term 'common use' is broad enough to encompass both. In sum, wildlife is reserved 'to the people,' not merely to those who consume it."

The Superior Court continued in its decision to explain that a Court reviewing a challenge to a regulation should not second guess the Board's decision, but should "ensure that the Board has taken a hard look at all factors relevant to the public interest before making that decision"; and that in regard to wildlife viewing, the Board did not take a hard look at the public's interest in viewing wolves when in 2022 it modified 5 AAA 92.111(c), and for that reason and others, declared the regulation arbitrary and invalid: stating at page 18 of the decision as follows:

"As discussed above, non-consumptive use is a form of common use reserved to the people of Alaska under Article VIII. Because it is constitutionally protected, it is a factor relevant and material to the public interest. The hearing transcripts show that the Board did not consider the impact expanded predator control would have on non-consumptive users of wolves. By failing to consider the impacts of wolf control on non-consumptive users, the Board failed to take a hard look."

For that reason and others, the Court on April 12, 2026 declared the regulation invalid, and entered final judgment in favor of Ms. Bittner and authorized her to file a motion for attorneys fees.

The decision by the Superior Court in the Bittner case, and the authorities upon which the Court relied, establishes that the loss of viewing by Alaskans is an important, constitutionally protected use. With that clear statement of this constitutional law, we know now that the repeal after 2010 of closures of wolf hunting and trapping in the Stampede road townships was arbitrary and voidable.

This instant proposal if adopted by the Board would provide a remedy for the previous arbitrary and voidable decisions of the Board of Game, where the Board opened all state owned land in the Stampede Road Townships to hunting and trapping of wolves..

The number of people who ride the buses on wildlife tours along the Park Road substantially exceed 100,000 every year, while only a handful of hunters and trappers consume these watchable wildlife species in the Stampede Road Townships. Closing state lands in these limited areas to hunting and trapping of the listed species is highly likely to increase the aesthetic enjoyment of non-consuming Alaskan visitors to the Park.

The Board needs to take a hard look at the numbers of consumptive users vs. non-consumptive users, the frequency of sightings before and after the repeal of the previous closures, the economic impact of allowing hunting and trapping in this limited area, and abide by the constitutional mandate that wildlife is reserved for both non-consumptive and consumptive users.

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

Yes. I consulted with individuals familiar with the history of efforts to close the townships and the Superior Court's decision.

PROPOSED BY: Kneeland Taylor (OI-F26-076)

Proposal 216

5 AAC 84.270; 92.095. Furbearer trapping; Unlawful methods of taking furbearers; exceptions.

Change the boundaries of the closed area to allow beaver trapping with submerged sets above the River Road bridge on the Chena River as follows:

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

Unit 20B – that portion of the Chena River downstream from the River Road bridge and Creamers Field Migratory Waterfowl Refuge

No Open Season

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

Beaver trapping in the closed area of Unit 20B

Change the boundaries of the closed area to allow beaver trapping with submerged sets above the River Road bridge on the Chena River

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-165)

Proposal 217

5 AAC 84.270. Furbearer trapping.

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20B Remainder as follows:

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

Allow the use of a firearm and bow and arrow to take beaver during an open trapping season in Unit 20B Remainder

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

In 2022 the regulations were changed to allow the use of a firearm and bow and arrow to take beavers under a trapping license statewide. This method of beaver harvest was allowed from 2022 until 2026, when the board was made aware of a conflicting regulation. The board clarified the conflicting regulation by returning the regulations to pre-2022 language. There are no current conservation concerns for beaver. I would like the board to restore the use of a firearm and bow and arrow as a legal method and means to take beaver under a trapping license in Unit 20B Remainder. This would not affect that portion of the Chena River downstream from its confluence with the Little Chena River and Creamer's Field Migratory Waterfowl Refuge.

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

Yes, the Fairbanks AC developed this proposal.

PROPOSED BY: Fairbanks Fish & Game Advisory Committee (OI-F26-155)

Proposal 218

5 AAC 84.270. Furbearer trapping.

Change season and bag limits for Furbearer Trapping in 20A and B as follows:

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

Proposal to reduce harvest of beaver and improve management of beaver populations:

Change to Alaska Administrative Code:

Article 7 -Seasons and Bag Limits, 5 AAC 84.270 Furbearer Trapping: Unit 20 (A) change from "no closed season, no limit" to "November 1 - April 30, no limit." Remainder of Unit 20 (B) change from "September 25 - May 31 no limit" to "November 1-April 30, no limit."

Suggestions for improved management of beaver populations:

1. The harvest period needs to be shortened to eliminate the open water seasons which extend from when the rivers start moving until May 31 and from September 25 through October 31. Beavers mate during the months of February and March. The gestation period is 105-107 days and kits are born after breakup. (Ref. #1). Harvesting during the spring open water season reduces the number of dominant females and corresponding new born kits. It is the most vulnerable time for beaver groups and colonies, since beavers only produce one litter per year. Harvesting beaver should not be allowed during this period of time. The fall open water season should be eliminated, as long as necessary to allow the beaver populations to increase back to normal levels
2. Each major drainage in 20B should be treated differently for management purposes, since each have different habitats and access points for the public. River drainages with large amounts

of aspen, birch and willow are better habit for beavers than areas dominated by climax forests, and harvest pressure is a function of accessibility.

3. Regulations should promote the taking of beaver while their hides are prime, ie when both the under fur and guard hairs are at their maximum length and density. Nonprime furs have under-developed underfur and guard hairs and the leather is reddish to black, due to root hair production of melanin. Grade IV and V pelts are almost useless (Ref. 2). Beaver molt their furs annually and trappers report the shedding of fur within 10 days of break-up. Fur management regulations normally are designed to permit trapping when the fur is prime, across species.

4. Beaver surveys should be conducted regularly in late fall to count the active beaver houses for each of the major drainages in 20B: the Saleha, Chena and Chatanika rivers. Beaver populations could then be estimated and harvest quotas determined, for use in establishing open seasons and methods of harvest.

5. Use of fire arms to harvest beaver should not be permitted as a means for harvest, except to kill nuisance beaver. To the extent open water seasons exist, trapping should be allowed only with underwater traps and snares, as written in the current regulations in 20 B (Ref 3)

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

An over harvest of beaver has occurred in unit 20 B due to the open water (non -ice) harvesting by various users, including non-fur takers who use the carcasses for bait. The current non-ice season for 20B is from April 15 through May 31, and September 25 through October 31. Trapping beaver on non-ice waters allows use of more efficient methods for accessing and harvesting beaver than fur-takers using under ice methods. This has resulted in reduction in beaver populations with fewer live houses (those with fall-time caches) and live houses with smaller caches.

User groups have been recently promoting non-prime fur harvesting of beaver. Trappers have been using above water conibears and leg hold sets and firearms. 5AAC 92-095(a)(10) prohibits use of firearms in 20B and requires below water-line traps and snares during the open water (non-ice) season.

Also, use of beaver carcasses for bear baiting and dog food has increased the non-fur demand, adding to the open water season harvest. Since 2022 firearms have been used, as the Board is aware, due to an error printed in the trapping regulations booklets distributed to the public. According to several experienced hunters that have used firearms to dispatch beaver, retrieval success is often 50 percent, resulting in waste of game.

I have been trapping beaver on the Chatanika River for the last 25 years and have kept records for a ten mile stretch of the river. In 2001-2002, there were 12 beaver houses with live caches in the lower stretch of the line. The upper portion of the line had 6. Over 270 beavers were harvested from that stretch of river since 2001. Our harvest for the 2026 season was 1 beaver, and there were six trappable houses.

Most of this decrease has occurred since 2022, which coincides with firearms beginning to be used, and an increase in user group promotion of open water harvesting. I became aware of

firearm use on beaver in early September of 2024. We encountered a hunter setting up an ambush on a beaver house and the hunter asked us if we were aware that it was legal to shoot beaver for bear bait. The date was September 3, three weeks before the open water season. This was also the first year we noticed a significant decrease in the number of live houses. We went to see Fish and Game to report our observations and they said they encountered a boater in possession of 12 beaver the last of May near the Olmes campground. These beaver were taken for the carcasses.

My records of fall beaver caches and beaver harvest for the Chatanika River may be the only records for this area, since there is no beaver biologist employed at ADFG - Fairbanks.

Individuals that have trapped 20A for the last 25 years have indicated that the last time they were able to get to their line, no caches were visible on any of the beaver lodges in the area.

I have a cabin on the Saleha river, and in 2010 there were 10 beaver houses visible within a 2 mile distance from our cabin. Today there are 2. Whereas in the past, beavers were seen swimming all up and down the river. There were "lumber yards near caches", and "bones" littered the gravel bars. Today all of the above are noticeably missing.

Ref #1: "Wild Furbearer Management and Conservation in North America", (WFMC), Ch. 25., pg 285.

Ref #2: WFMC, Ch. 53., pg. 720 & 726.

Ref #3: Alaska Administrative Code 5AAC 92.095 "The following methods and means of taking furbearers under a trapping license are prohibited: (10): taking beaver in Units 11, 13 and 16 from September 25 through November 9; in the remainder of 20 (B) and in Unit 20(0) from September 25 through October 31 and from April 16 through May 31; and in Units 7 and 15 from October 15 through November 9 and from April 1 through April 30, except with underwater traps or snares."

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

PROPOSED BY: Garry Hutchison

(OI-F26-136)

Proposal 219

5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

Reestablish the Beaver Sealing Requirement in GMU's 20 A, B, C, D as follows:

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

In the interest of beaver conservation, I believe it would be prudent to reestablish the Beaver Sealing Requirement in GMU's 20 A, B, C, D in order to provide harvest data to the ADF&G necessary to answer questions regarding appropriate levels of harvest, numbers taken within

specific drainages, methods of harvest, age class ratios, and the chronology of harvest in the central Interior.

Regulatory Language May Read As Follows:

5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

(a) A person may not possess, transport, or export from the state the untanned skin of a marten taken in Units 1 - 7 and 14 - 16, the untanned skin of a beaver taken in Units 1 - 11 and 13 - 17, **20A, B, C, D, ...**

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

Potential beaver harvest concerns exist in Interior Alaska; the cessation of beaver harvest data collection in the Interior by ADF&G in the early 2000's (due to beaver sealing requirements being repealed) and the elimination of Fur Acquisition Form and Fur Shipping Tag requirements has resulted in the loss of beaver harvest data from the past 20 or so years. As a result, effective beaver harvest monitoring no longer exists.

There is currently controversy surrounding potential beaver declines in highly accessible, high pressure portions of central GMU 20, centering on the expanded beaver seasons and the allowance of harvest by shooting through the Spring.

In the last decade there has also been a significant increase in demand for beaver carcasses for usage as bear bait, with harvest being facilitated by open water trapping/shooting seasons.

In my extensive personal experience, harvesting beaver by shooting in open water contributes significantly to unrecorded take and wounding loss rates, if done without precise shot placement and the utilization of retrieving dogs or equivalent methodology for rapid retrieval before carcasses sink or are swept away.

Lastly, with open water take, it is virtually impossible to determine if beaver have been harvested from colonies that are being trapped annually by established trappers, who often utilize the accepted practice of limited harvest per lodge to farm beaver colonies.

Beaver as a species are long-lived furbearers, documented to live up to 12 years in the wild. That combined with relatively low reproductive rates leave beaver populations vulnerable to over harvest.

I believe the resumption of harvest data collection is necessary for ADF&G to manage beaver more effectively and that sealing is an efficient method of data collection.

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

No, This was primarily the culmination of numerous discussions with a variety of beaver trappers in the central GMU 20 area.

PROPOSED BY: Robert Hunter

(OI-F26-214)

Antlerless Moose & Brown Bear Tag Fee

Reauthorizations for Other Regions

Proposal 220

5 AAC 085.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6(C) as follows:

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

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
...		
Unit 6(C)		
1 moose per regulatory year, only as follows:		
1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued	Sept. 1-Oct. 31 (General hunt only)	No open season.
or		
1 moose by registration permit only;	Nov. 1-Dec. 31	No open season.
...		

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

Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The department recommends reauthorizing the state antlerless hunt in Unit 6C to achieve the harvest objectives when the federal subsistence hunt is not able to achieve the desired level of harvest.

The population objective in Unit 6C is 600–800 moose. A population estimate completed during March 2023 yielded an estimate of 503 moose, 22% of which were calves. Preliminary survey data from 2026 suggests that the population is back within the population objective. Because

the available antlerless harvest quota in Unit 6C is currently harvested under a federal subsistence season administered by the U. S. Forest Service, we have not held the antlerless hunt since RY99.

A registration hunt was approved by the board (RM169) to provide additional hunt opportunity if harvestable surplus existed after federal hunts were administered. Without an antlerless moose hunt, this hunt cannot function as intended when it is needed. Continuation of the antlerless hunts may be necessary to manage population growth and keep it within the limits of what the habitat can support.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-005)

Proposal 221

5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
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(15)

Unit 17(A)

Up to 2 moose per
regulatory year only as follows:

RESIDENT HUNTERS:

1 moose by registration
permit only; or

Aug. 25–Sept. 25
(Subsistence hunt only)

...

1 antlerless moose by registration
permit only;

Jan. 1–last day of Feb.
(Subsistence hunt only)

....

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

Antlerless moose hunts must be reauthorized annually by the board. The department management goals are to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support populations. They also help regulate moose population growth, help to meet intensive management (IM) objectives for high levels of harvest, and provide subsistence hunters with the opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios. The board adopted an antlerless moose hunt in 2013 after hearing many comments from the public including those from groups such as the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, and the Togiak National Wildlife Refuge.

The Unit 17A moose management plan calls for antlerless moose hunting opportunity when the population is above 600 moose and increasing. When the population exceeds 1,200 moose, a bag limit of up to two moose is needed to provide increased opportunity to reduce moose abundance to protect habitat. Based on the most recent survey in March 2026, the population estimate with sightability correction was $1,846 \pm 256$ moose. This is a decline from the previous 2022 estimate of $1,976 \pm 218$, but remains above the population objective. The bag limit of two moose combined with antlerless harvest opportunity provide a mechanism to limit population growth and allow hunters to harvest surplus animals.

The moose population in subunit 17A is over objective and can sustain additional harvest; however, the objectives for this population include allowing it to expand into neighboring areas to provide additional harvest opportunities. This population is currently contributing to the growth of adjacent moose populations, especially to the north and west.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-011)

Proposal 222

5 AAC 84.045(a)(12). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose draw permits in Units 14A and 14B as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
Unit 14(A)		
1 moose per regulatory year, only as follows:		
...		
1 antlerless moose by drawing permit only; up to 2,000 antlerless moose permits may be issued; or	Aug. 20–Sept. 25 (General hunt only) Nov. 1–Dec. 25 (General hunt only)	No open season
...		
1 moose by targeted permit only; by crossbow, shotgun or bow and arrow only; up to 200 permits may be issued	Winter season to be announced (General hunt only)	No open season
Unit 14(B)		
1 moose per regulatory year, only as follows:		
...		
1 moose by targeted permit only; by crossbow, shotgun, or bow and arrow only; up to 100 permits may be issued.	Winter season to be announced (General hunt only)	No open season
....		

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

Antlerless moose hunts must be reauthorized annually by the Board of Game. There are two types of antlerless moose hunts in the Matanuska-Susitna Valley—a drawing permit hunt used to regulate growth of the moose population in Unit 14A, and targeted hunts used to mitigate public safety concerns in Units 14A and 14B.

Antlerless moose hunts have been authorized in Unit 14A since 2001 in order to regulate the growth of the population. The permit level was increased from 450 to 1,000 in 2013 to account for the continued increase in the population and again in spring 2018 from 1,000 to 2,000. Increased harvest based on the increased permit levels has brought the population back to near the population objective for the unit of 6,000–6,500 moose. The department has reduced permit levels significantly as the population has approached the objective and will continue to adjust them as necessary.

Moose surveys conducted in November 2023 yielded an estimate of 6,657 moose in Unit 14A. This estimate was greater than the post-hunt objective of 6,000–6,500 moose and less than the 2020 survey estimate of 7,112 moose. This indicates that antlerless harvests are having the desired effect of reducing the population to near objectives. The sex and age composition demonstrated a bull ratio of 30 bulls:100 cows and a calf ratio of 28 calves:100 cows. The Unit 14A moose twinning rate has been 28% in both 2024 and 2025, the highest since 2017, and has been trending upwards since the low of 15% in 2021; likely indicating population growth.

Moose-human conflicts have declined along with the moose population as it has approached the population objective. The targeted moose hunts in Units 14A and 14B, which are authorized to include an antlerless component, have been a tool to address public safety concerns related to moose-vehicle collisions and nuisance management issues. Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 278 moose per year were killed in the Matanuska-Susitna Valley area during the last five years of average snowfall, which is lower than the previous 5-year average; substantially more moose are killed during higher snowfall years. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt opportunity. Antlerless hunts are an important tool to control the moose population’s trajectory and provide additional moose hunting opportunity in the Matanuska-Susitna Valley when appropriate.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-008)

Proposal 223

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

Reauthorize the antlerless moose seasons in Unit 14(C) as follows:

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

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
...		
Unit 14(C), Joint Base Elmendorf-Richardson (JBER) Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by regulatory year by drawing permit, and by muzzleloading blackpowder rifle or bow and arrow only; up to 185 permits may be issued		
Unit 14(C), that portion known as the Birchwood Management Area	Sept. 1—Mar 31 (General hunt only)	Sept 1.—Mar 31
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		
Unit 14(C), that portion known as the Anchorage Management Area	Sept 1.—Nov. 30 (General hunt only)	No open season
1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloading black powder rifle only; up to 50 permits may be issued		
Unit 14(C), that portion		

of the Ship Creek drainage
upstream of the Joint Base
Elmendorf-Richardson (JBER)
Management Area

1 moose by drawing permit only; up to 50 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
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...

Remainder of Unit 14(C)

1 moose per regulatory year,
only as follows:

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1—Sept. 30 (General hunt only)	Sept. 1—Sept. 30
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1 antlerless moose by drawing permit only; up to 60 permits may be issued; or	Sept. 1—Sept. 30 (General hunt only)	No open season
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1 bull by drawing permit only, by bow and arrow only; up to 10 permits may be issued	Oct. 20—Nov. 15	No open season
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...

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

Antlerless moose hunts must be reauthorized annually, and the department recommends reauthorizing the antlerless moose hunts in Unit 14C. The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in Unit 14C at the desired population objective of 1,500 moose. This population size reduces over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts in urban areas, and starvation during severe winters. Antlerless hunts also provide additional moose hunting opportunities with minimal controversy among resource users.

Moose in Unit 14C are managed intensively for a population objective of 1,500–1,800 moose and an annual harvest objective of 90–270 moose (5AAC 92.108). The number of antlerless permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. In 2013, the department estimated that the moose population contained approximately 1,533 moose in Unit 14C from a combination of population census, composition surveys, and extrapolation to unsurveyed areas. A combined 2024 aerial composition count of the JBER Management Area and the Ship Creek drainage (the area that provides the most hunting opportunity in Unit 14(C)) found 233 moose. A bull:cow ratio of 44 bulls per 100 cows and a calf:cow ratio of 14 calves per 100 cows observed was an increase from 2023 ratios. Overall population estimates, and calf:cow ratios, are still slightly down from before the winter of 2022 when persistent, deep snow likely resulted in additional winter mortality and an increase in the late winter energetic demands on pregnant cows.

Harvest numbers continue to remain relatively steady, and at this population level we have received fewer reports of human-moose conflicts and moose-vehicle collisions. Harvesting cow moose is paramount to maintaining the population at the low end of the objective while still providing harvest opportunity.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-007)

Proposal 224

5 AAC 085.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season on Kalgin Island in Unit 15B as follows:

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(13) hunting seasons and bag limits for moose in Unit 15 are as follows: ...		
Unit 15(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20—Sept. 25	Aug. 20—Sept. 25
...		

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

Antlerless moose hunts must be reauthorized annually by the Board of Game (board). The current regulation for hunting moose on Kalgin Island in Unit 15B allows hunters to harvest antlerless moose with the goal of reducing the population to the management objective of 20-40 moose.

In 1995, in response to concerns that the moose population on Kalgin Island had exceeded the island's carrying capacity and deteriorating habitat conditions, the board established a drawing permit hunt for antlerless moose. In a further attempt to reduce the number of moose on the island, the board established a registration hunt for any moose in 1999. Despite these measures to reduce moose numbers, moose remain abundant on the island and continue to meet or exceed the management objective. Antlerless hunts, such as RM572, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat.

During the most recent moose survey in November 2025, department staff counted 136 moose on Kalgin Island. In the last 5 years, the department issued an average of 107 permits for this hunt, of which 74 permittees hunted, yielding an average annual harvest of 23 moose. Tracking harvest over time provides an indicator of hunter effort and success rates; success rates on the island have remained high with a 5-year average of 31%.

The any moose registration hunt is recommended to reduce moose numbers on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will make overharvest unlikely.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-009)

Proposal 225

5 AAC 85.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 15C as follows:

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

This proposal would reauthorize the antlerless moose hunt for the 15C Antlerless (DM549) and the targeted hunt (AM550).

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

(13) hunting seasons and bag limits for moose in Unit 15 are as follows:

...

Unit 15(C), that portion from the mouth of Deep Creek easterly along the south bank of Deep Creek to N 59° 55.183', W 151° 8.155'; then southeasterly in a straight line to the unnamed creek at N 59° 54.342', W 151° 6.459'; and easterly down the south bank of this stream to Caribou Lake and easterly along the south shore to the outlet of Fox Creek, then south along the west bank of Fox Creek to the mouth of Fox Creek, and along the mean high tide line to the point of origin

RESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the nonresident drawing hunt: or

Oct. 20—Nov. 20

...

1 moose by targeted permit only[,] Oct. 15—Mar. 31

NONRESIDENT HUNTERS:

...

1 antlerless moose by drawing permit only; the taking of calves, and females accompanied by calves, is prohibited; up to 100 permits may be issued in combination with the resident drawing hunt Oct. 20—Nov. 20

Remainder of Unit 15(C)

...

RESIDENT HUNTERS:

...

1 moose by targeted permit only Oct. 15—Mar. 31

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

Antlerless moose seasons must be reauthorized annually by the Board of Game. The department recommends reauthorization of the 15C antlerless hunt (DM549) and the targeted hunt (AM550) along the Sterling Highway in Unit 15C for the 2027-28 hunting season.

In February 2023, a geospatial population estimator (GSPE) census was conducted in the northern portion of Unit 15C (north of Kachemak Bay) and resulted in an initial population estimate of 5,162 moose (95% CI: 3,934–6390), of which 22% (95% CI: 15–28) were calves. This equates to a density of approximately 4.4 moose/mi² in the census area and indicates the population has continued to grow since 2010. However, the spatial distribution of moose during winter is heavily skewed away from elevations > 1000 feet in Unit 15C. This creates high variance of moose abundance in grid cells and removal of a single high density grid cell from the GSPE census reduces the population estimate to 4,486 moose (95% CI: range 3,581–5391), of which 22% (95% CI: 14–28) were calves. Despite this variability in moose distribution influencing precision of GSPE censuses, the population appears to be at or above the upper end of the intensive management population objective of 3,500 moose. Fall composition counts in

core count areas during November 2025 provided a bull ratio of 28 bulls:100 cows. Antlerless hunts, such as DM549 and AM550, provide potential opportunities for hunter harvest and improved food security while maintaining healthy moose herds and habitat.

The lowlands in Unit 15C, south of Deep Creek and Caribou Lake, which encompass the hunt boundary of DM549, contain high densities of moose when deep snow drives moose to lower elevations. The human population continues to grow in this area and, according to U.S. Census Bureau statistics, has doubled in size since the 1980s. Negative interactions with humans can occur as moose become more aggressive in their search for food around human residences in years of low food abundance. In 2023, the hunt area was expanded to reduce hunter conflicts with private property owners. Fifty to 65 permits were issued in each of the last 10 years resulting in an average harvest of 26 cows annually.

The purpose of AM550 is to allow for the harvest of antlerless moose along the Sterling Highway in Unit 15C during deep snow winters to reduce moose and vehicle collisions. On average, 65 known animals are killed each year in vehicle collisions in Unit 15C. The department will decide when and where permits will be issued during the hunt period. Targeted hunts are administered through a registration permit and up to 100 moose may be taken. The number of permits issued each year depends on existing conditions, and it is possible no permits will be issued in some years.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-010)

Proposal 226

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

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C) as follows:

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

Seasons and Bag Limits	Resident	Nonresident
	Open Season (Subsistence and General Hunts)	Open Season
(5)		
...		
Unit 7, the Placer River drainages, and that por- tion of the Placer Creek (Bear Valley) drainage		

outside the Portage
Glacier Closed Area, and
that portion of Unit 14(C)
within the Twentymile
River drainage

RESIDENT HUNTERS:

1 moose by drawing permit
only; up to 60 permits
for bulls will be issued in
combination with nonresident
hunts, and up to 70 permits for
antlerless moose will be issued

Aug. 20—Oct. 10
(General hunt only)

NONRESIDENT HUNTERS:

1 bull by drawing permit only;
up to 60 permits for bulls
will be issued in combination
with resident hunts

Aug. 20—Oct. 10

...

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

Antlerless moose seasons must be reauthorized annually, and the department recommends reauthorizing the antlerless hunt in Units 7 and 14C. The moose population in the Twentymile/Portage/Placer area has a history of rapid increase following mild winters and sharp reductions during severe winters. In 2009, antlerless permits were issued for the first time since 2004. The number of permits issued depends on the current population estimate and bull:cow ratios, as well as estimated winter mortality. A November 2024 aerial composition count of moose in the Twentymile, Portage, and Placer River drainages found 203 moose with a bull:cow ratio of 33 bulls per 100 cows and a calf:cow ratio of 23 calves per 100 cows. This is the highest overall count in the Twentymile survey area since 2003 with an increase in the bull:cow ratio and an average calf:cow ratio.

The harvest of antlerless moose provides the department with a management tool to maintain the number of moose in the Twentymile/Portage/Placer area at a population level low enough to reduce over-browsing of winter habitat, moose-vehicle collisions, and starvation during severe winters. This allows for a healthier and more productive moose population due to decreased stress levels associated with winter food shortages. This hunt has been successful in creating additional moose hunting opportunity with little or no controversy.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-006)

Proposal 227

5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

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

5AAC 92.015. Brown bear tag fee exemption

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

- (1) Unit 11;
- (2) Units 13 and 16(A);
- (3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

- (A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;
- (B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;
- (C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;
- (D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

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

- (1) Unit 9(B);
- (2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);
- (3) Unit 17;

...

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

Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 and are managed primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The bear seasons and bag limits adopted along with the elimination of the tag fee were intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-021)
