

WP26–49 Executive Summary	
General Description	Wildlife Proposal WP26-49 requests to increase the hunting harvest limit for coyotes in Unit 18 from 2 to 4 and lengthen the hunting season to August 15—May 31. <i>Submitted by: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council</i>
Proposed Regulation	<p>Unit 18—Coyote Hunting</p> <p><i>Unit 18—4 ² coyotes</i> <i>Sep. 1—Apr. 30</i> <i>Aug. 15—May 31</i></p> <p>Unit 18—Coyote Trapping</p> <p><i>No limit</i> <i>Nov. 10—Mar. 31</i></p>
OSM Conclusion	Support
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	Support
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	Did not consider
Interagency Staff Committee Comments	The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Comments	Oppose
Written Public Comments	None

**Wildlife Analysis
WP26-49**

ISSUE

Proposal WP26-49, submitted by the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (YKD Council) requests to increase the hunting harvest limit for coyotes in Unit 18 from 2 to 4 and lengthen the hunting season to August 15—May 31.

PROPONENT STATEMENT

The proponent states that this would create additional opportunity for federally qualified subsistence users. Residents of Unit 18 have observed the number of coyotes to be increasing in parts of the unit. There are no known conservation concerns.

Current Federal Regulations

Unit 18—Coyote Hunting

Unit 18—2 coyotes. Sep. 1—Apr. 30

Unit 18—Coyote Trapping

No limit Nov. 10—Mar. 31

Proposed Federal Regulations

Unit 18—Coyote Hunting

*Unit 18—4 \pm coyotes Sep. 1—Apr. 30
Aug. 15—May 31*

Unit 18—Coyote Trapping

No limit Nov. 10—Mar. 31

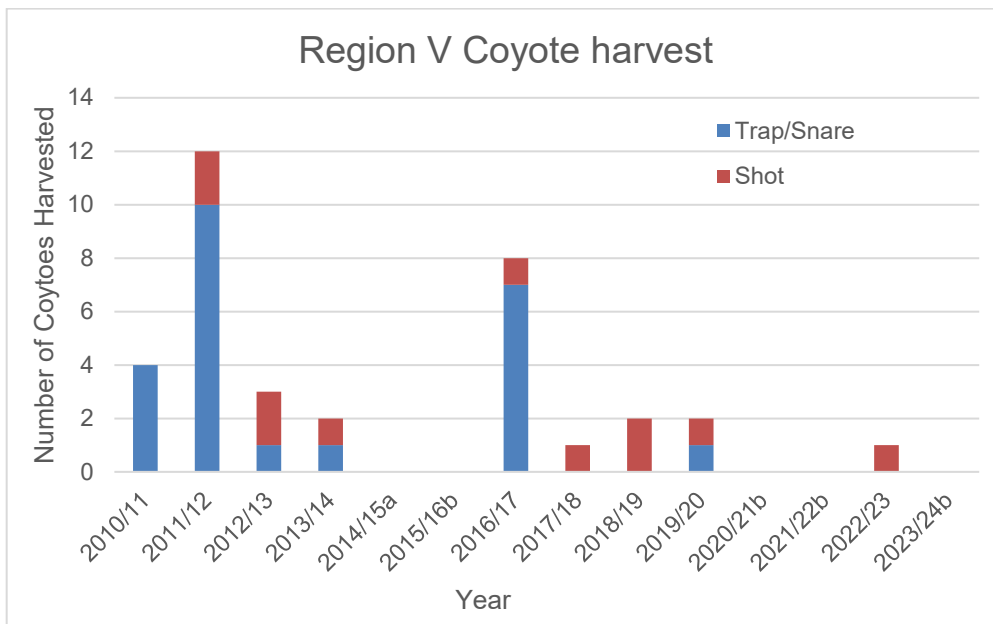
A species trend is calculated by ADF&G and provided in the annual trapper report. The trend calculation includes input from trappers regarding there being fewer, the same, or more animals on the landscape to create the trend of increasing, no change, or decreasing for a species (Bogle 2021a, 2021b, 2022, 2023, and 2025). ADF&G Trapper Reports report information by region, not unit. Unit 18 is part of Region V, which includes Units 18, 22, 23, and 26A.

Coyotes in Region V were listed as scarce with no changes in the trend starting RY2017/18, changing to scarce with an increasing trend in RY2022/23, and common with an increasing trend in RY2023/24 (Bogle 2021a, 2021b, 2022, 2023, and 2025). This corroborates with local observations and traditional ecological knowledge shared by Council members during the YKD Council meetings that coyote numbers are increasing in Unit 18 (YKDRAC 2025).

Harvest History

Coyotes are a peripheral species to trappers in Unit 18 with very low harvests (Jones 2013). Reported harvest for coyotes is through voluntary questionnaires sent out by ADF&G. This data is gathered by regions, instead of units. Unit 18 is part of Region V – Northwest Alaska, along with Units 22, 23, and 26A (Bogle 2023).

Since 2010, the largest number of coyotes reported shot in one year was two, with up to ten reported from trapping (**Figure 1**). However, since this is a voluntary report and a very large region, it is not an accurate picture of the actual coyote harvest taking place in Unit 18.



^a No trapping report released for this regulatory year.

^b No reports of coyote harvest this regulatory year.

Figure 1. RY2010-2023 ADF&G Region V reported coyote harvest through voluntary trapping questionnaires (Bogle 2021a, 2021b, 2022, 2023, and 2025; Parr 2016, 2017, and 2018; and Spivey 2019 and 2020).

Discussion and Effects

If this proposal is adopted, Federal regulations for coyote hunting in Unit 18 would be liberalized. This would increase opportunity for federally qualified subsistence users to harvest coyote under a hunting license in Unit 18. No conservation concerns are expected as all available information indicates coyote harvest is extremely low, and that population are increasing. Additionally, the trapping harvest limit is ‘no limit’, and coyotes may also be taken by firearm under a trapping license.

However, hides must be salvaged, and the quality of hides during the extended season into August and May is likely lower than during the winter. Adopting these regulatory changes also increase regulatory complexity by misaligning State and Federal hunting regulations for coyote in Unit 18.

OSM CONCLUSION

Support Proposal WP26-49.

Justification

This proposal increases opportunity for federally qualified subsistence users and there are no conservation concerns.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

The council voted to **support** WP26-49, which they submitted. They noted that coyote numbers are increasing and there are no conservation concerns. This proposal would increase subsistence opportunity. The Council also discussed that coyotes did not use to occur in the region and shared that there is no Yup'ik word for coyote.

INTERAGENCY STAFF COMMITTEE COMMENT

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Wildlife Proposal WP26-49

This proposal seeks to increase the hunting harvest limit for coyotes in Game Management Unit 18 from 2 to 4 and lengthen the hunting season to August 15—May 31.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal as it sees its passage as an unnecessary deviation from state regulations and therefore contrary to Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and recent directives from the President and Secretary of the Interior.

ANILCA §1314(a) explicitly states: "Nothing in this Act is intended to enlarge or diminish the responsibility and authority of the State of Alaska for management of fish and wildlife on the public lands except as may be provided in Title VIII..." Title VIII provides only a narrow exception allowing the Secretary to restrict State-authorized harvest when necessary to meet the needs of federally qualified rural residents. Section 802(2) establishes the policy that "nonwasteful subsistence uses of fish and wildlife and other renewable resources shall be the priority consumptive use of all such resources on the public lands of Alaska **when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population...**" [emphasis added]. Section 804 reiterates this policy and establishes criteria to implement a priority when the above conditions are met. It does not authorize wholesale replacement of State management. Per §815(3) of ANILCA, "...restriction on nonsubsistence uses are only authorized when necessary for the conservation of healthy wildlife populations or to continue subsistence uses."

Executive Order 15153, Sec. 3(b)(xxii) directs the Department of the Interior to conduct meaningful consultation with State fish and wildlife agencies prior to enacting land management plans or regulations affecting hunting and fishing opportunities on public lands. This directive was reinforced by Secretarial Order 3447, which calls for removing unnecessary barriers to hunting and fishing, expanding access where compatible, improving coordination with State agencies, and ensuring transparent review of any proposed restrictions.