

<b>WP26–55/56 Executive Summary</b>	
<b>General Description</b>	<p>Wildlife Proposal WP26-55 requests to require a State registration permit, extend fall season dates, and establish a winter season for moose in a portion of Unit 22A. <i>Submitted by the Alaska Department of Fish and Game.</i></p> <p>Wildlife Proposal WP26-56 requests extending the fall season to Aug. 1–Sep. 30 and establishing a winter moose season of Dec. 1–last day of Feb. <i>Submitted by the Seward Peninsula Subsistence Regional Advisory Council.</i></p>
<b>Proposed Regulation</b>	<p><u>WP26-55</u></p> <p style="text-align: center;"><b>Unit 22A—Moose</b></p> <p><i>Unit 22A, that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage—1 bull by <b>State</b> Federal-registration permit.</i></p> <p style="text-align: right;"><del>Aug. 15–Sep. 14.</del> <b>Aug. 1–Sep. 30</b>  <b>Dec. 1–last day of Feb.</b></p> <p><i>Federal public lands are closed to the taking of moose except by federally qualified users hunting under these regulations. The BLM Anchorage Field Office is delegated authority to close the season in consultation with ADF&amp;G</i></p> <p><u>WP26-56</u></p> <p style="text-align: center;"><b>Unit 22A—Moose</b></p> <p><i>Unit 22A, that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage—1 bull by Federal registration permit.</i></p> <p style="text-align: right;"><del>Aug. 15–Sep. 14.</del> <b>Aug. 1–Sep. 30</b>  <b>Dec. 1–last day of Feb.</b></p> <p><i>Federal public lands are closed to the taking of moose except by federally qualified users hunting under these regulations. The BLM Anchorage Field Office is delegated authority to close the season in consultation with ADF&amp;G</i></p>
<b>OSM Conclusion</b>	<b>Support</b> Proposal WP26-55 and <b>take no action</b> on Proposal WP26-56.
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b> Proposal WP26-55 and <b>take no action</b> on Proposal WP26-56

<b>WP26–55/56 Executive Summary</b>	
<b>Interagency Staff Committee Comments</b>	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.
<b>ADF&amp;G Comments</b>	<b>Support</b> Proposal WP26-55 and <b>take no action</b> on Proposal WP26-56
<b>Written Public Comments</b>	<b>None</b>

## **Wildlife Analysis WP26-55/56**

### **ISSUE**

Wildlife Proposal WP26-55, submitted by the Alaska Department of Fish and Game (ADF&G), requests to require a State registration permit, extend fall season dates, and establish a winter season for moose in a portion of Unit 22A.

Specifically, WP26-55 requests to replace Federal registration permit FM2201 with State registration permits, change fall season dates from Aug. 15–Sep. 14 to Aug. 1–Sep. 30 and establish a winter season of Dec. 1–last day of Feb. for moose in Unit 22A, that portion in the Unalakleet River drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including Egavik Creek drainage (22A Unalakleet). While the submitted proposal lists the opening date of the winter season as Jan. 1, the proponent clarified their intent was Dec. 1.

Wildlife Proposal WP26-56, submitted by the Seward Peninsula Subsistence Regional Advisory Council (Council), requests identical changes the Unit 22A Unalakleet moose season (extending the fall season to Aug. 1–Sep. 30 and establishing a winter season of Dec. 1–last day of Feb.).

### **Proponent Statement**

#### WP26-55

ADF&G states these changes will create consistency between Federal and State regulations. It will also reduce confusion over the need for two separate permits when hunting moose in Unit 22A Unalakleet, helping users better understand and adhere to regulations. The proponent states these changes will not impact the moose population, which is currently growing.

#### WP26-56

The Council states that these proposed changes will align Federal and State regulations, which were recently changed. These changes will reduce regulatory complexity, prevent Federal regulations from being more restrictive than State regulations, and will give federally qualified subsistence users more opportunity to meet subsistence needs.

## Current Federal Regulations

### Unit 22A—Moose

*Unit 22A, that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage—1 bull by Federal registration permit.*

*Aug. 15–Sep. 14.*

*Federal public lands are closed to the taking of moose except by federally qualified users hunting under these regulations. The BLM Anchorage Field Office is delegated authority to close the season in consultation with ADF&G*

## Proposed Federal Regulations

### WP26-55

### Unit 22A—Moose

*Unit 22A, that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage—1 bull by **State** ~~Federal~~-registration permit.*

~~*Aug. 15–Sep. 14.*~~  
*Aug. 1–Sep. 30*

*Dec. 1–last day of Feb.*

*Federal public lands are closed to the taking of moose except by federally qualified users hunting under these regulations. The BLM Anchorage Field Office is delegated authority to close the season in consultation with ADF&G*

WP26-56

**Unit 22A—Moose**

*Unit 22A, that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage—1 bull by Federal registration permit.*

~~Aug. 15–Sep. 14.~~  
**Aug. 1–Sep. 30**

**Dec. 1–last day of Feb.**

*Federal public lands are closed to the taking of moose except by federally qualified users hunting under these regulations. The BLM Anchorage Field Office is delegated authority to close the season in consultation with ADF&G*

**Current State Regulations**

**Unit 22A–Moose**

*Unit 22A, Unalakleet River drainage and all drainages flowing into Norton Sound north of Golsovia River drainage and south of and including the Egavik Creek drainage*

*Residents: One bull by permit available online at <http://hunt.alaska.gov> and in person in Unalakleet beginning July 2. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.*

RM841 Aug. 1–Sep. 30

OR

*Residents: One antlered bull by permit available online at <http://hunt.alaska.gov> and in person at license vendors in Unalakleet beginning November 12.*

RM844 Dec. 1–Feb. 28

*Nonresidents*

*No open season*

**Extent of Federal Public Lands**

Unit 22A Unalakleet is comprised of 75% Federal public lands, all of which are managed by the Bureau of Land Management (BLM).

### **Customary and Traditional Use Determination**

Residents of Unit 22 have a customary and traditional use determination for moose in Unit 22.

### **Regulatory History**

Please see Regulatory History section of Proposal WP26-54 analysis.

### **Current Events**

The Federal Subsistence Board (Board) will consider Proposal WP26-54 at their April 2026 meeting. Proposal WP26-54 requests to rescind all three moose hunting closures to non-federally qualified users on Federal public lands in Unit 22A, which includes Unit 22A Unalakleet.

The Board will also consider Wildlife Closure Review WCR26-09, which reviews all three of the moose hunting closures in Unit 22A per the Board's Closure Policy. The OSM recommendation presented to the Seward Peninsula Council in April 2025 was to rescind these closures.

### **Biological Background**

Please see Biological Background section of Proposal WP26-54 analysis.

### **Cultural Knowledge and Traditional Practices**

Please see the Cultural Knowledge and Traditional Practices section of Proposal WP26-54 analysis for general information.

Currently, Unit 22A Unalakleet is closed to moose hunting by non-federally qualified users. This means that only federally qualified subsistence users—those with a customary and traditional use determination for moose in Unit 22A—may currently hunt for moose on Federal public lands in the subunit. This includes all residents of Unit 22. However, in Unit 22A, harvest is primarily by local residents, close to their communities (Thomas 1982, SPRAC 2021). Unalakleet is the only community that has reported harvest in Unit 22A under the FM22001 permit since it was first issued in 2008 (OSM 2025). The community is located at the mouth of the Unalakleet River in eastern Norton Sound, approximately 148 miles southeast of Nome (DCRA 2024). Unalakleet is a subregional hub community, but it is not connected by road to Nome (Ahmasuk and Trigg 2007). Since the mid-nineteenth century the Unalakleet River has marked a rough linguistic boundary between speakers of Iñupiaq to the north and Central Yup'ik speakers to the south (Woodbury 1984). In 2023, Unalakleet had an estimated population of 685 (ADLWD 2023).

Moose harvest by residents of Unalakleet has been documented in subsistence surveys in 2002 and 2004 (Georgette et al. 2004, ADF&G 2025). During the 2002 study year, residents of Unalakleet harvested all their moose in August and September (Georgette et al. 2004). Harvest timing information is not available for the 2004 survey year (ADF&G 2025). Unalakleet residents harvested an average of

19 moose per survey year, resulting in about 14 pounds of food per person. An average of 60% of households used moose across both study years (ADF&G 2025).

### **Harvest History**

Please see Harvest History section of Proposal WP26-54 analysis.

### **Alternative(s) Considered**

One alternative considered was to retain the Federal registration permit. As there is currently a Federal lands closure, only federally qualified subsistence users may hunt moose on Federal public lands in Unit 22A Unalakleet. Requiring a State registration permit instead would mean nonlocal residents who are non-federally qualified users as well as federally qualified subsistence users would be hunting under the same permit. While this would simplify regulations for subsistence users who would no longer need two permits or have to distinguish land status, it could complicate law enforcement and harvest reporting. However, nonlocal resident harvest pressure in Unit 22A Unalakleet is extremely low and Proposal WP26-54 requests rescinding this closure. If Proposal WP26-54 is adopted, then any law enforcement concerns are nullified. However, if Proposal WP26-54 is not adopted, and the closure is retained, then the Council and Board should consider retaining the Federal permit requirement.

### **Discussion and Effects**

If Proposals WP26-55/56 are adopted, fall season dates will be extended and a winter season will be established in Unit 22A Unalakleet, increasing subsistence opportunity. If Proposal WP26-55 is adopted, a State registration permit will be required instead of a Federal permit, reducing the administrative burden on subsistence users and Federal managers. Subsistence users would only need one permit, while Federal managers would no longer need to administer a Federal permit.

No impacts to the moose population are expected as the moose population is growing and above State management objectives, bull:cow ratios are extremely high, hunting pressure is low, and federally qualified subsistence users may already harvest moose during the extended fall and winter seasons on non-Federal lands under State regulations.

Adopting Proposal WP26-55 would also decrease regulatory complexity and confusion by aligning State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to “ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands.”

## **OSM CONCLUSION**

**Support** Proposal WP26-55 and **take no action** on Proposal WP26-56.

### **Justification**

The moose populations appear to be increasing across Unit 22A and bull:cow ratios are extremely high, indicating an abundance of surplus bulls available for harvest and no conservation concerns. Extending the fall season and establishing a winter season will increase opportunity for federally qualified subsistence users, consistent with State opportunity. Replacing the Federal permit requirement with the State permit will simplify regulations and reduce the administrative burden on users and managers.

## **LITERATURE CITED**

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## **SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION**

### **Seward Peninsula Subsistence Regional Advisory Council**

**Support** Proposal WP26-55 and **take no action** on Proposal WP26-56. Most users already rely on the State permit for harvesting moose in Unit 22A Unalakleet since the State season was extended to match the Federal season. As a result, having the Federal permit is not necessary. Codifying the winter season will increase opportunity for federally qualified subsistence users, and there are no conservation concerns.

### **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**

**Support** WP26-55 and **take no action** on WP26-56. No comment submitted.

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