

<b>WP26–57 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP26-57 requests to establish Federal registration moose permits in Unit 22A, that portion north of the Egavik Creek drainage and Unit 22A remainder. <i>Submitted by the Seward Peninsula Subsistence Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<p style="text-align: center;"><b>Unit 22A—Moose</b></p> <p><i>Unit 22A, that portion north of the Egavik Creek drainage—1 bull by Aug. 1–Sep. 30. Federal registration permit.</i></p> <p><i>Federal public lands are closed to hunting Sep. 21–Aug. 31 except by federally qualified users hunting under these regulations</i></p> <p><i>Unit 22A, remainder—1 bull by Federal registration permit. However, Aug. 1–Sep. 30. during the period Jan.1–Feb. 15, only an antlered bull may be taken. Jan. 1–Feb. 15.</i></p> <p><i>Federal public lands are closed to the taking of moose, Oct. 1–Aug. 31, except by federally qualified subsistence users</i></p>
<b>OSM Conclusion</b>	<b>Neutral</b> on Proposal WP26-57
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	<b>Oppose</b> Proposal WP26-57
<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>Oppose</b>
<b>Written Public Comments</b>	<b>None</b>

**Wildlife Analysis  
WP26-57**

**ISSUE**

Wildlife Proposal WP26-57, submitted by the Seward Peninsula Subsistence Regional Advisory Council (Council), requests to establish Federal registration moose permits in Unit 22A, that portion north of the Egavik Creek drainage (Unit 22A North) and Unit 22A remainder.

**Proponent Statement**

The proponent states establishing a registration permit for these hunt areas will allow for greater Federal harvest data to be collected, improving management of these moose populations.

**Current Federal Regulations**

**Unit 22A—Moose**

*Unit 22A, that portion north of the Egavik Creek drainage—1 bull. Aug. 1–Sep. 30.*

*Federal public lands are closed to hunting Sep. 21–Aug. 31 except by federally qualified users hunting under these regulations*

*Unit 22A, remainder—1 bull. However, during the period Jan. 1–Feb. 15, only an antlered bull may be taken. Aug. 1–Sep. 30.*

*Jan. 1–Feb. 15.*

*Federal public lands are closed to the taking of moose, Oct. 1–Aug. 31, except by federally qualified subsistence users*

**Proposed Federal Regulations**

**Unit 22A—Moose**

*Unit 22A, that portion north of the Egavik Creek drainage—1 bull by **Federal registration permit.** Aug. 1–Sep. 30.*

*Federal public lands are closed to hunting Sep. 21–Aug. 31 except by federally qualified users hunting under these regulations*

*Unit 22A, remainder—1 bull by **Federal registration permit.** However, Aug. 1–Sep. 30.*

*Jan. 1–Feb. 15.*

during the period Jan.1-Feb. 15, only an antlered bull may be taken.

Federal public lands are closed to the taking of moose, Oct. 1-Aug. 31, except by federally qualified subsistence users

**Current State Regulations**

**Unit 22A–Moose**

*Unit 22A, north of the Egavik Creek drainage*      *Residents: One bull*      *HT*      *Aug. 1–Sep. 30*

*Nonresidents: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side*      *HT*      *Sep. 1–Sep. 20*

*Unit 22A, remainder*      *Residents: One bull*      *HT*      *Aug. 1–Sep. 30*

*Or*

*Residents: One antlered bull*      *HT*      *Jan. 1–Jan. 31*

*Nonresidents: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side*      *HT*      *Sep. 1–Sep. 30*

**Extent of Federal Public Lands**

The Unit 22A North hunt area is comprised of 78% Federal public lands, all of which are managed by the Bureau of Land Management (BLM).

Unit 22A remainder is comprised of 50% Federal public lands and consists of 43% U.S. Fish and Wildlife Service (USFWS) managed lands and 7% BLM managed lands

**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**

Wildlife 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 North and Unit 22A remainder. Wildlife Closure Review WCR26-09 reviews these closures per the Board's Closure Policy. The OSM recommendation presented to the Seward Peninsula Council in April 2025 was to rescind these closures. This proposal and closure review will be considered by the Board at the next wildlife regulatory meeting in April 2026.

## **Biological Background**

Please see Biological Background section of Proposal WP26-54 analysis

## **Cultural Knowledge and Traditional Practices**

Please see Cultural Knowledge and Traditional Practices section of Proposal WP26-54 analysis

## **Harvest History**

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

## **Discussion and Effects**

If this proposal is adopted, federally qualified subsistence users would be required to obtain a Federal registration permit to hunt moose in Unit 22A North and Unit 22A remainder under Federal regulations. This would not affect users' opportunity but would place additional administrative burdens on users and managers. However, the information gathered from harvest reporting would allow better tracking of harvest and improve management of these moose populations.

Adopting this proposal would increase regulatory complexity by misaligning State and Federal permit requirements for these hunts as State regulations only require a harvest ticket. If Proposal WP26-54 is adopted, rescinding the Federal lands closures in Unit 22A, all users could hunt on Federal public lands under State regulations by harvest ticket. This would limit the efficacy of these new Federal permits in tracking harvest. Federal and State seasons mostly align in these hunt areas. If both WP26-54 and WP26-57 are adopted, the only time when federally qualified subsistence users would need to have a Federal registration permit is from Feb. 1-15 in Unit 22A remainder when the State hunt is closed.

No direct impacts to the moose population are expected if this proposal is adopted. However, the moose population may benefit in the long-term through more informed management.

## **OSM CONCLUSION**

**Neutral on Proposal WP26-57.**

### **Justification.**

Requiring a Federal registration permit could improve harvest reporting and provide for better informed management of these moose populations. This could benefit both the resource and subsistence opportunity in the long-term.

However, if WP26-54 is adopted, rescinding the Federal lands closure, hunters would likely use a State harvest ticket and hunt under State regulations as they would just need one ticket and would not need to differentiate land status. Under this scenario, adopting WP26-57 would represent an additional administrative burden on federally qualified subsistence users and managers without much benefit.

However, if WP26-54 is rejected and the Federal land closure is retained, then anyone hunting on Federal public lands during the closure period would need a Federal registration permit. Under this scenario, the administrative burden would also increase, but documentation of hunting effort and harvest by federally qualified subsistence users would improve, informing management. However, the existing closures do not apply during the State nonresident moose seasons in September. This would limit the efficacy of requiring Federal permits as subsistence users could hunt by State harvest ticket under State regulations in September when much of the subsistence hunting likely occurs.

## **SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION**

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

**Oppose** Proposal WP26-57. The Council opposed creating a new permit. Due to the previous recommendation on WP26-54, establishing a new Federal permit will be unnecessary. If the closure in Units 22A North and remainder are lifted as recommended, all users will be able to hunt using a State harvest ticket, making an additional Federal permit burdensome to federally qualified subsistence users.

## **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**

**Oppose.** No comment submitted.