

WP26–59 Executive Summary	
General Description	Wildlife Proposal WP26-59 requests to shift the fall moose season in Unit 22B, west of the Darby Mountains from Sep. 1–14 to Sep. 6–20. <i>Submitted by the City of White Mountain.</i>
Proposed Regulation	<p style="text-align: center;">Unit 22B—Moose</p> <p><i>Unit 22B, west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G</i> <i>Sep. 1–14 6–20</i></p> <p><i>Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations</i></p> <p><i>Unit 22B, west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G.</i> <i>Jan. 1-31.</i></p> <p><i>Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations</i></p>
OSM Conclusion	Oppose Proposal WP26-59
Seward Peninsula Subsistence Regional Advisory Council Recommendation	Oppose Proposal WP26-59
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 WP26-59

ISSUE

Wildlife Proposal WP26-59, submitted by the City of White Mountain, requests to shift the fall moose season in Unit 22B, west of the Darby Mountains (22B West) from Sep. 1–14 to Sep. 6–20 (Please see Map 1 in WP26-58).

Proponent Statement

The proponent states the current season limits opportunity for residents of White Mountain as poor hunting conditions exist at the start of September.

This proposal seeks to address these challenges by changing the season start date to September 6 to better align with local hunting conditions, allowing White Mountain residents a fairer chance to harvest moose for subsistence.

Early September in the region brings warmer temperatures, resulting in moose staying in higher elevations or more forested areas, which are difficult for hunters to access. Wet conditions and frequent high-water events during this time also make travel by boat or ATV hazardous, as hunters must cross rivers and marshlands that can become impassable. Dense vegetation at the start of the season reduces visibility, making it harder to spot moose.

Additionally, local subsistence hunters are facing inefficiency in their use of fuel. During the first five days of the season, it is rare for hunters in Unit 22B West to successfully harvest moose. As a result, significant amounts of fuel are wasted as hunters drive up and down the Niukluk and Fish River and its tributaries searching for moose without success. By shifting the start of the fall hunt to start September 6, the likelihood of harvesting a moose would increase, improving the efficiency of fuel use for local hunters.

The proponent further states that they are actively involved in this issue, working with local hunters, the city council, and community members on this issue, and submitting this proposal on behalf of local subsistence hunters, who are significantly affected by the current regulations and seek an adjustment to ensure they can meet their subsistence needs.

Current Federal Regulations

Unit 22B—Moose

Unit 22B, west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Sep. 1-14.

Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G

Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations

Unit 22B, west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Jan. 1-31.

Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations

Proposed Federal Regulations

Unit 22B—Moose

Unit 22B, west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G Sep. ~~1-14~~ 6-20

Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations

Unit 22B, west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Jan. 1-31.

Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations

Current State Regulations

Note: Unit 22B remainder under State regulations is the same as Unit 22B West under Federal regulations.

Unit 22B–Moose

Unit 22B, remainder *Residents: One bull by permit available in person in RM840 Sep. 1-14 Brevig Mission, Golovin, Nome, Teller, and White Mountain from July 25-Aug. 25. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.*

OR

Residents: One antlered bull by permit available in RM843 Jan. 1-31. person in White Mountain and Golovin beginning Dec. 1. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.

Nonresidents *No open season.*

Extent of Federal Public Lands

Unit 22B west of the Darby Mountains is comprised of approximately 28% Federal public lands, consisting of 27% Bureau of Land Management (BLM) and 1% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**).

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 in WP26-58.

Current Events

Proposal WP26-58 requests to eliminate the Federal moose permit FM2202 and to change the harvest limit from “one bull” to “one antlered bull” for the winter moose hunt in Unit 22B West.

The Board will consider Wildlife Closure Review WCR26-11/12 at their April 2026 meeting. WCR26-11 reviews the closure to moose hunting by non-federally qualified users in Unit 22B West during the fall season. WCR26-12 reviews the closure to moose hunting, except by residents of White Mountain and Golovin in Unit 22B west during the winter season.

On February 8, 2025, ADF&G re-opened the RM843 hunt for antlered bull moose in Unit 22B West by EO 05-01-25 to provide additional opportunity because the annual quota had not been met (ADF&G 2025a). On February 14, 2025, ADF&G closed the RM843 hunt in Unit 22B West by EO 05-02-25 as the quota had been met (ADF&G 2025b).

Biological Background

Please see Biological Background section in WP26-58.

Cultural Knowledge and Traditional Practices

Please see Cultural Knowledge and Traditional Practices section in WP26-58.

Harvest History

Please see Harvest History section in WP26-58.

Alternative(s) Considered

One alternative considered was to extend the moose season by six days (Sept. 1-20), maintaining the season opening date of September 1st. This would prevent the State hunt from opening before the Federal hunt, which puts federally qualified subsistence users at a disadvantage. This would also allow federally qualified subsistence users to hunt later in the season (Sept. 15-20) when weather and travel conditions are more conducive to moose hunting.

Unit 22B West moose are managed by a quota and seasons are often closed early by EO as quotas are quickly met. Extending the Federal season until September 20th may decrease users' opportunity during the winter hunt. It also increases regulatory complexity by misaligning State and Federal fall seasons. Hunting could only occur on the limited Federal lands during the extended fall season, requiring users to differentiate land status while in the field. Since this hunt typically closes early and changing Federal regulations will only affect hunting on Federal public lands, submitting a proposal to the BOG to shift the State fall season may be a better place to start to increase White Mountain residents' opportunity and address the proponent's concerns.

Discussion and Effects

If this proposal is adopted, the moose season in Unit 22B West will be shifted by six days, opening September 6th under Federal regulations instead of September 1st. Hunting and travel conditions may improve later in the season when the weather is cooler and drier, increasing users' opportunity and

likelihood of success. No impacts to the moose population are expected as this hunt is managed by a quota.

However, if Federal regulations change and the State season remains the same, federally qualified subsistence users would be at a disadvantage. Unit 22B West is comprised mostly of State managed lands where moose hunting opens on September 1st. Federally qualified subsistence users hunting under State regulations would also need to differentiate land status from Sept. 1-5 as Federal lands are closed to hunting under State regulations. Almost all Unit 22B West hunts have closed early by EO since 2018 because the quota was reached, and demand for moose remains high while supply remains low. Therefore, the State fall hunt could close before the Federal fall hunt even opens. This proposal would also increase regulatory complexity by misaligning State and Federal fall seasons.

OSM CONCLUSION

Oppose Proposal WP26-59.

Justification

This proposal would decrease opportunity for federally qualified subsistence users, putting them at a disadvantage because the State season would still open on September 1st. Quotas are low for moose in Unit 22B West and have been reached quickly since 2018, closing seasons early. If the Federal season opener were delayed until September 6th, federally qualified subsistence users would miss out on six days of opportunity.

LITERATURE CITED

ADF&G. 2025a. Emergency Order R5-1-25. Issued February 7, 2025. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/static/applications/publicnotification/2025/releases/R5-AA-25-3298.pdf>

ADF&G. 2025b. Emergency Order R5-2-25. Issued February 12, 2025. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/static/applications/publicnotification/2025/orders/R5-2-25.pdf>

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION**Seward Peninsula Subsistence Regional Advisory Council**

Oppose Proposal WP26-59. Adopting this proposal could reduce harvest opportunities for local residents by increasing pressure from hunters outside the area for the late season hunt. If the State season dates do not change, the harvest quota may be achieved before the Federal season opens, further reducing Federal subsistence opportunity. This hunt usually meets its harvest quota quickly, resulting in an early closure.

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 comments submitted.

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