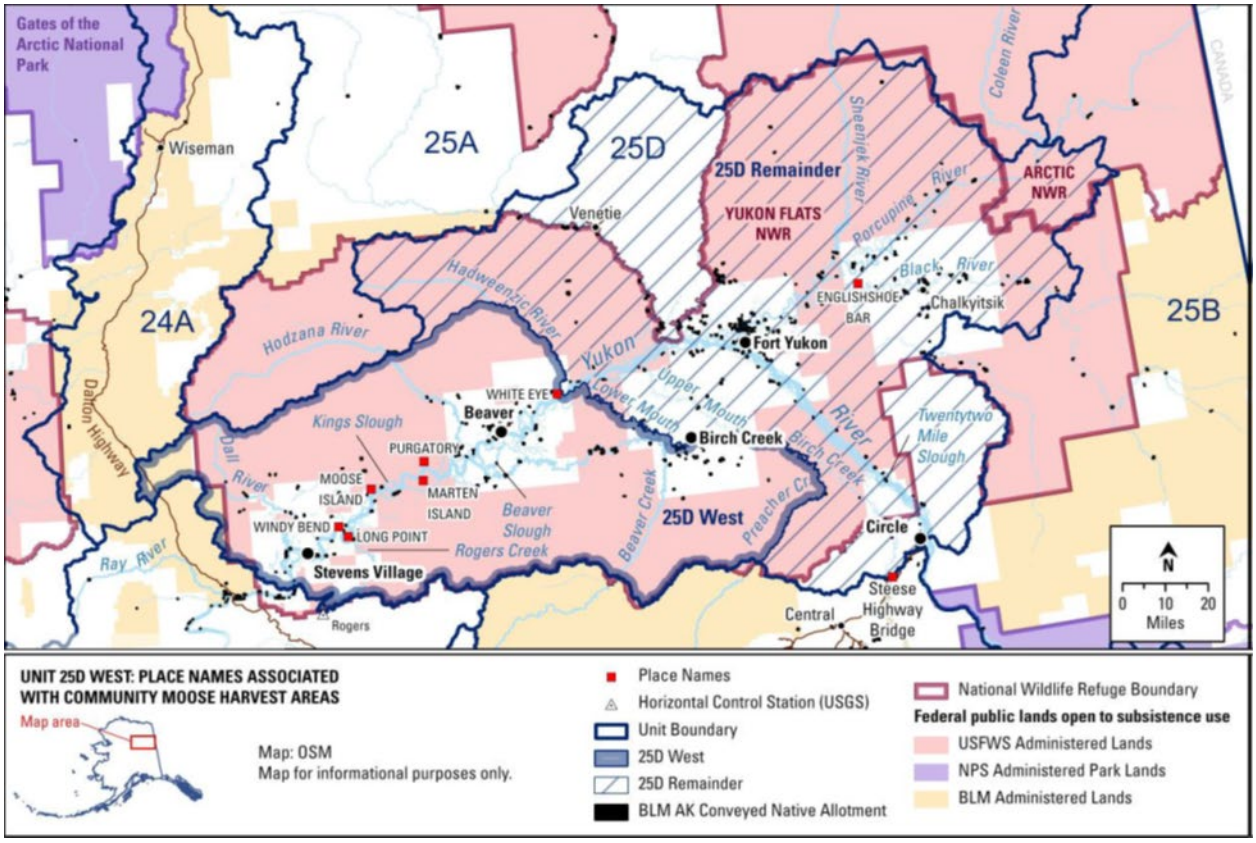
WP26-75 Executive Summary	
General Description	Proposal WP26-75 requests to close moose hunting in Unit 25D remainder to non-federally qualified users. *Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council*
Proposed Regulation	**Unit 25– Moose** *Unit 25D, remainder—1 antlered moose* *Aug. 25-Oct. 15. Dec. 1-20* ***Federal public lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.***
OSM Preliminary Conclusion	**Oppose**
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**None**

Draft Wildlife Analysis
WP26-75

ISSUE

Proposal WP26-75, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests to close moose hunting in Unit 25D remainder to non-federally qualified users (**Map 1**).



Map 1. Unit 25D remainder and Unit 25D west moose hunt areas.

Proponent Statement

The proponent states that the moose density in this area is very sparse, and there are conservation concerns for moose. No aerial surveys for moose have been done in Unit 25D remainder since 2015. The proponent also notates that there are concerns about the ability of federally qualified subsistence users to meet their needs for moose due to the low numbers and competition with non-federally qualified users. The proponent wants to ensure that the moose population can remain at a sustainable level for harvest by federally qualified subsistence users. The closure in neighboring Unit 25D west

has been working well for local residents, and the proponent feels replicating this in Unit 25D remainder would also help residents of that portion of the unit to be more likely to meet their subsistence needs.

Current Federal Regulations

Unit 25− Moose

Unit 25D, remainder—1 antlered moose.	*Aug. 25-Oct. 15.* *Dec. 1-20*

Proposed Federal Regulations

Unit 25− Moose

Unit 25D, remainder—1 antlered moose	*Aug. 25-Oct. 15.* *Dec. 1-20*

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

Current State Regulations

Unit 25D− Moose

Unit 25D remainder	*Residents:—1 bull OR*	*HT*	*Sep. 10 – Sep.20*
	1 bull OR	*HT*	*Feb. 18 – Feb. 28*
	1 bull by permit OR	*CM001*	*Sep. 10 – Sep.20*
	1 bull by permit	*CM001*	*Feb. 18 – Feb. 28*
	Nonresidents— 1 bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side	*HT*	*Sep. 10 – Sep.20*

Extent of Federal Public Lands

Unit 25D is comprised of approximately 63% Federal public lands and consists of 62% U.S. Fish and Wildlife Service (USFWS) managed lands, and 1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Residents of the remainder of Unit 25 have a customary and traditional use determination for moose in Unit 25D remainder.

Regulatory History

In the early 1980s, the Alaska Board of Game (BOG) divided Unit 25D into Unit 25D West and Unit 25D remainder to allow use of regulatory schemes that reflected the difference status of the moose populations (permits are required in Unit 25D west due to low moose density and relatively high demand for moose by local residents, while harvest tickets are required in Unit 25D remainder) (Caikoski 2014).

In 1990, the Federal moose season for Unit 25D remainder ran from Aug. 25 – Sep. 25 and Dec. 1 – Dec. 10 with a harvest limit of one bull.

In 1991, the Federal Subsistence Board (Board) adopted Proposal P91-74 to extend the winter season in Unit 25D remainder 10 days to Dec. 20 to provide greater harvest opportunity, particularly to accommodate inclement weather in December.

In 1993, the Board adopted Proposal P93-61 to modify the harvest limit in Unit 25D remainder to one antlered moose.

In 1995, the Board adopted Proposal P95-52, allowing the take of moose and caribou in Unit 25 from a snowmachine or motorboat. This was done to alleviate unnecessary restrictions on federally qualified subsistence users in Unit 25 as this provision was already allowed in other units across the State.

In 2000, the BOG established a community harvest permit program for the Chalkyitsik Community Harvest Area (CM001), which includes Unit 25D remainder and Unit 25B remainder (Caikoski 2014).

In 2010, the Board adopted Proposal WP10-93 with modification to extend the closing date of the fall moose season in Unit 25D remainder from Sep. 25 to Oct. 1 to provide additional harvest opportunity. The modification only extended the fall season six days. This was consistent with the proponent's request to provide for some additional harvest opportunity, while addressing conservation and meat spoilage concerns of starting the fall season in early August.

In 2012, the Board adopted Proposal WP12-63, which required edible meat to be left on the bones of caribou and moose harvested in Unit 25 until removed from the field and/or processed for human consumption. This was done to reduce meat spoilage.

In 2024, the Board adopted Proposal WP24-33 extending the fall moose season in Units 25B, 25C, and 25D remainder to close October 15. In Unit 25D remainder, this extended the season by 14 days. The Board stated that this extension of the season increases opportunity for federally qualified subsistence users during a time when they don't have to compete with non-federally qualified users hunting under State regulations and it may help to address concerns about proper meat care and the potential for spoilage due to warmer weather earlier in the season. OSM cited minimal conservation concerns for the season extension due to the bulls-only harvest limit, high bull:cow ratios and relatively low reported local harvest and harvest pressure after the State seasons close.

Biological Background

State management objectives for moose in Unit 25D are to maintain a minimum of 40 bulls:100 cows in the post-hunt population, and a population of 10,000-15,000 moose (Caikoski 2024). Moose densities have been historically low across Unit 25D. During the 1980s and 1990s, when the Alaska Department of Fish and Game (ADF&G) and USFWS began conducting regular surveys, moose densities ranged from a low of 0.1 moose/mi^2 in 1984 to a high of 0.64 moose/mi^2 in 1989 (Caikoski 2014). Between 1999 and 2007, moose densities in Unit 25D remainder averaged 0.25 moose/mi^2 (range: 0.18-0.34 moose/mi^2, **Table 1**). No population or composition surveys were completed in 2011 or 2012 due to poor survey conditions (Caikoski 2014). In 2015, moose density in Unit 25D remainder was estimated at 0.34 moose/mi^2 (Bertram 2017, pers. comm.).

Between 1999 and 2015, fall bull:cow ratios in Unit 25D remainder averaged 64 bulls:100 cows (range: 35-95 bulls:100 cows), meeting management objectives (40 bulls:100 cows) in all years except 2015 (**Table 2**, Caikoski 2014; Bertram 2017, pers. comm.). Fall calf:cow ratios of < 20 calves:100 cows, 20-40 calves:100 cows, and > 40 calves:100 cows may indicate declining, stable, and growing moose populations, respectively (Stout 2010, 2012). Between 1999 and 2007, fall calf:cow ratios in Unit 25D remainder averaged 48 calves:100 cows (range: 37-59 calves:100 cows), suggesting a stable or growing moose population (**Table 2**, Caikoski 2014). In 2015, fall calf:cow ratios were extremely high at 80 calves:100 cows (Bertram 2017, pers. comm.). However, Caikoski (2014) cautions that interpretation of demographic trends may be confounded by variations in survey areas and small sample sizes.

Habitat is not considered a limiting factor. Unit 25 as a whole, contains excellent moose habitat that is maintained by wildfires (Caikoski 2014). Predation by wolves and bears; however, appears to be limiting the Unit 25 moose population (Caikoski 2014). Lake et al. (2013) investigated wolf kill rates of moose in Unit 25D. They found that wolf kill rates approximated those in areas with higher moose densities, suggesting that wolf predation is contributing to persistent low moose densities (Lake et al. 2013). Similarly, Bertram and Vivion (2002) found that while calf production is high in Unit 25D, only 20% of radio collared calves survived their first year. Predation of neonates (< 1 month old calves) by black and brown bears was the primary source (84%) of mortality. High predation rates combined with illegal cow harvest and low predator harvest may act in concert to maintain low moose densities in Unit 25D (Bertram and Vivion 2002; Caikoski 2014).

Table 1. Bull:cow, calf:cow and moose density for Unit 25D remainder (Caikoski 2014; Bertram 2017, pers. comm.).

Year	Bulls:100 cows	Calves:100 cows	Density (moose/mi^2)
1999	57	59	0.28
2000	79	49	0.25
2001	95	43	0.18
2004	43	51	0.26
2005	80	58	0.34
2006	60	37	0.27
2007	64	39	0.20
2015	35	80	0.34
Average	64	52	0.27

Cultural Knowledge and Traditional Practices

The subsistence moose harvest in Unit 25D has been discussed and debated for a long time. This is because Yukon Flats moose is one of the lowest density populations in North America (USFWS 2025). Council members have described factors that limit their ability to harvest enough moose which prompts them to propose Federal harvest restrictions. Primary are observations of less moose to harvest coupled with increasing competition from outside hunters who seem to have highly sophisticated equipment; a warming climate which affects the type and amount of willow browse available to moose, and appears to lead to increased numbers of predators; and development projects that damage habitat, pollute, and attract new people and more competition for moose (EIRAC 2025: 41-46, 48-50). Most important, however, is the intricate system of Yukon Flats Tribal Governance land use boundaries in Unit 25D that specify who harvests moose and where. It appears that the current customary and traditional use determinations for Unit 25D moose reflect Tribal Governance boundaries. And, because Fort Yukon is a recent, hub community with residents that have moved there from other Yukon Flats villages, it seems to be viewed differently than the other Yukon Flats communities in the Tribal Governance system (Stevens Village Council 1999, 1991 and Caulfield 1983). All of these considerations are critical because moose are central to the subsistence harvest of the residents of Yukon Flats. The Athabascan peoples of the Eastern Interior region have a long history of harvesting moose for subsistence. Indigenous and Traditional knowledge of moose and moose hunting is detailed and central to the culture of Yukon Flats Athabascans (ADF&G 1992, Nelson et al. 1978, Nelson 1973). The communal harvest and sharing of moose is the defining characteristic of these subsistence economies (ADF&G 1992, Sumida 1990, 1989, 1988, Sumida and Alexander 1985). Euro-Americans who reside in the Yukon Flats also depend heavily on moose as a subsistence staple.

Restricted access to Unit 25D moose began under State management in 1983 when the Board of Game created Unit 25D west and enacted a registration hunt in response to "…local, advisory committee, and Department of Fish and Game concerns about the sparse numbers of moose in the area (Sumida and

Alexander 1985: 1). When the Federal Subsistence Management Program began in 1990, the State regulations were adopted. Those regulations remain in place today, forty-two years later:

1.) The communities of Stevens Village, Birch Creek and Beaver and others living within Unit 25D west have a customary and traditional use determination for moose in Unit 25D west.

2.) The communities within Unit 25D remainder: Arctic Village, Venetie, Fort Yukon, Chalkyitsik and Circle have a customary and traditional use determination for moose in Unit 25D remainder.

The current proposal, WP26-75 is the most recent, but not the first, attempt by Fort Yukon to enhance their ability to harvest moose in Unit 25D. In 1993, two residents of Fort Yukon voiced opposition to their exclusion from the C&T determination for moose in Unit 25D west:

> I know and have relatives that harvest moose in that area. Those people live in Fort Yukon and outside this area Unit 25D west. Subsistence users that harvest from Fort Yukon should not be made outlaws. People [from]outside use [permission] to be made by the village council in the area (OSM 1993).

Similar comments were voiced at a public meeting held in Fort Yukon in 1993:

> [Speaker] [I] Would like moose permits issued to Beaver, Birch Creek, and Stevens Village to be transferable to residents of Fort Yukon. Some residents of Fort Yukon have relatives in these villages and have traditionally hunted moose in Unit 25D west where there is a C&T determination. [I] would like to see people who use and/or own land (not necessarily primary resident) in the area be included for permits [in Unit 25D west] (OSM 1993).

In 2002, Yukon Flats communities and ADF&G partnered to address the Unit 25D moose shortage. The result was the Yukon Flats Cooperative Moose Management Plan (ADF&G et al. 2002). Among many proposed approaches to moose management was the suggestion of a Federal subsistence and/or State Tier II permit to establish a moose hunt in Unit 25D remainder/east similar to the system used in Unit 25D west. Ultimately it was rejected due to concerns about regulatory complication and potentially low reporting rates (ADF&G et al. 2002: 29-30).

During the previous wildlife proposal cycle in 2024, the Council submitted WP 24-34 which requested that the Board add Fort Yukon and Circle to the list of communities with a C&T determination for moose in Unit 25 D west. This proposal was withdrawn during the March 2007 Council meeting due to objections from the Council of Athabascan Tribal Governments, Native Village of Stevens, Dinyee Village Corporation, the Birch Creek Tribal Council and individuals (OSM 2024: 47-55). The reasons for the opposition were low numbers of moose, increased competition from non-local hunters and primarily, the system of Tribal Governance that specifies hunting areas for Yukon Flats communities (OSM 2024: 20-61).

Early ADF&G Division of Subsistence technical papers and land planning documents from Stevens Village Council provided history and descriptions of Yukon Flats Tribal Governance. Information in these documents indicates that Tribal boundaries are the origin of the current C&T determinations for moose in Unit 25D.

As noted above, the communities with a C&T determination for moose in Unit 25D remainder include: Arctic Village, Venetie, Fort Yukon, Chalkyitsik and Circle. Except for Circle, the Division of Subsistence described the hunting areas of these communities in 1983 (See **map 1**). *(A map from a 2017 ADF&G Division of Subsistence study shows that Circle residents hunt for moose on Birch Creek although the map does not indicate if this part of Birch Creek is within the boundary of Unit 25D west. (Trainor et al. 2020a: 103).*

> Fort Yukon hunters often travel by boat in search of moose in particularly good areas along the Yukon River downstream as far as White Eye or the lower mouth of Birch Creek, up Birch Creek or up the Yukon towards Twenty-two mile near Circle. Others travel up the Porcupine River or its tributaries, such as the lower portion of the Sheenjek, Coleen or Black rivers to harvest moose (Caulfield 1983: 156).
>
> …[an] observation derived from the data is that relatively little overlap occurs in the areas used, with the possible exception of Fort Yukon. Arctic Village residents report the use of the East Fork of the Chandalar River extending downriver as far as Big Rock Mountain and Brown Grass Lake. South of this general area, Venetie residents engage in hunting, fishing, trapping and gathering activities. Similarly, the Black River above…Englishshoe Bar is generally used by Chalkyitsik residents. Downriver from that vicinity, Fort Yukon residents are the primary users. Residents articulate their awareness of these generalized use areas Chalkyitsik's area, for example, is referred to as the "Black River Country". Similarly, Arctic Village's area of use is often referred to as "the Chandalar country" (Caulfield 1983:189).

Fort Yukon residents reported using areas which were also utilized by residents of other communities. For example, Fort Yukon residents reported hunting moose on Birch Creek from its mouth at the Yukon River upstream to the Steese Highway Bridge crossing, an area typically used by Birch Creek residents (Caulfield 1983: 190). Opponents of WP24-34 stated that the original draft analysis of the proposal to add Fort Yukon and Circle to the C&T determination for moose in Unit 25D west did not acknowledge traditional Tribal Governance and worldview (EIRAC 2023: 252).

Because of this omission, Randy Mayo, President of the Dinyee Corporation and former Chief of Stevens Village, shared two documents prepared by the Stevens Village Tribal Council and gave OSM permission to review and cite them. These are the 1999 Stevens Village Land Use Plan, Ethnogeography of Ancestral Lands and Integrated Resource Management Plan, and the 1991 Comprehensive Land Use Plan for the Traditional Lands of Stevens Village. Both documents describe the boundaries of Stevens Village's "ancestral lands" and aspects of the tribal governance that shapes the boundaries which applies to other communities. The Division of Subsistence technical papers and the Stevens Village

Land Use Plans describe community-specific hunting area boundaries, negotiated by Yukon Flats leaders which are known by residents. In general, these sources say that residents of specific communities hunt within an area immediately around their home community:

> The local band organization defined both linguistic community and a subsistence use area with well known boundaries. A band's territory was ordinarily closed to other groups, unless permission was granted for use. In many cases, long-term arrangements existed between adjacent bands that permitted exploitation of a resource in an area other than one's own if that resource was lacking in a person's home area (Stevens Village Council 1991: 3).

> Although a number of traditional settlements diminished due to disease, traditional boundaries were maintained (Stevens Village Council1991: 4).

> For generations, tribal members also invited neighboring tribes, usually a family from another village to spend the year among them. By invitation, the visitors were allowed to share all resources on the traditional lands of Stevens Village. Local historians clearly remember residents of Tanana, Fort Yukon, Birch Creek and others coming to live among them to trap muskrats, hunt moose etc, until the 1950s. Traditionally the people of Stevens Village shared their land resources, but everyone, meaning the local native people, maintained the same lifestyle (Stevens Village Council 1991: 36).

Ethnolinguistic analysis of the indigenous place names throughout the Yukon Flats show the consistency of the community boundaries and the governance that determines them (Stevens Village Council 1999, 1991; Caulfield 1983). The indigenous place name analyses are the result of collaborative work among many people including Athabascan linguistic scholars; Koyukon and Gwich'in speakers and scholars, including Chief Kilbourne George of Stevens Village; Eliza Jones, Koyukon Athabascan linguist and scholar; Clarence Alexander, former Grand Chief of the Gwich'in of Alaska who co-founded the Council of Athabascan Tribal Governments and co-authored the *Gwich'in Dictionary* with his wife, Virginia E. Alexander; and Dr. James Kari, linguist and Professor Emeritus with the Alaska Native Language Center at the University of Alaska Fairbanks, whose research specialty is the Dene/Athabascan languages of Alaska (Stevens Village Council 1999 and Caulfield 1983: 201):

> At this time [1999], the Stevens Village Ancestral lands are set off in space somewhat from potentially overlapping band territories of other former Athabaskan bands. At the turn of the 20th century there would have been overlapping land use areas and territorial knowledge in all directions from Stevens Village.

> The collated set of [place] names constitutes a cognitive map or mental map that is rule-governed and well suited for memorization. The Stevens Village names conform to the general rules of the Northern Athabaskan place naming: a few core grammatical patterns (in particular the binomial naming pattern specific + generic); an economical clustering of names around salient features; concrete analyzable names which range between the functional and the metaphysical; and very few of personal names in

> Athabaskan place names. The Stevens Village cognitive map is a typical names network and territorial expanse for an Alaskan Athabaskan community that has maintained its population and land use activities. (I estimate that an average land use area for a single Athabaskan band was 3,000 to 4000 sq miles.) (Kari in Stevens Village 1999: 85).

In 1983, this phenomenon, that place names correlate with discrete, defined community land use areas, was also documented in Division of Subsistence Technical Paper No. 16, Subsistence Land Use in Upper Yukon Porcupine Communities, Alaska DINJII NATS'AA NAN KAK ADAGWAANDAII, a study of subsistence land use patterns in Arctic Village, Birch Creek, Chalkyitsik, Fort Yukon, and Venetie (Caulfield 1983):

> First, it is evident that residents of the five study communities have made, and continue to make, extensive use of the Upper Yukon-Porcupine region for the harvest of wild resources. Wild resources in the region are known to be widely dispersed or only seasonally abundant. Land use patterns reflect this fact and, consequently, extensive areas are utilized to obtain necessary resources. Certain resources …require more intensive site-specific land use within the larger area of use. Data pertaining to the distributions of Native-named places known to community residents also mirror reported areas of use quite closely, providing evidence that traditional land use areas persist. Areas mapped by residents of the study communities largely fall within those areas utilized by 19th century Gwich'in bands at the time of their first contact with Euroamericans. These bands were traditionally centered in the drainages of major rivers. Contemporary land use data suggests that this pattern has continued to the present day… Documentation of Native-named places for each community provides evidence of this fidelity with respect to land use areas. Thus, while residence patterns in these areas may have changed over time, from seasonally-mobile use to community-based sedentism, the general areas utilized appear consistent with those used in the past (Caulfield 1983: 187).

When Division of Subsistence researchers conducted field work in Yukon Flats communities in the early 1980's, residents taught them about "customary law", or tribal governance of land and resources. Researchers documented their understanding of "customary law" and observed that "Self limiting principles appear to be guidelines for appropriate behavior enforced through social pressure by community and tribal councils and local residents themselves" (Caulfield 1983: 192, 205-206, 209).

Researchers noted that "relatively discreet use areas exist for each community with only limited overlap," and "The first element of customary law in the region is that each community appears to have a prescribed area of use which, though not totally exclusive in nature, places limits upon the use of the land by non-community residents…relatively little overlap occurs" (Caulfield 1983: 192, 205-206).

However, these sources also indicate that there are exceptions and nuance to these boundaries. In at least two Division of Subsistence technical papers, the community of Fort Yukon is described as an

exception to the general practice of hunting only near one's home community (Caulfield 1983: 206; Van Lanen et al 2012: 36). A variety of reasons are cited for this difference, and they include the fact that Fort Yukon is a hub community and some of the residents are from nearby villages, it is the largest community in the Yukon Flats, and local hunting areas may be crowded resulting in high hunting pressure (Caulfield 1983: 190-191).

The following anecdote may illustrate the nuance of the Fort Yukon exception and how the discreet use areas are still observed:

> One Fort Yukon resident whose outboard motor broke down on the Yukon River while moose hunting in the fall had to resort to floating downriver to the village of Beaver which is located outside of Fort Yukon's area of use. He reported that those who met him on the beach in Beaver gave him a cool reception until he made it clear that he was not hunting in their use area but that his boat had simply broken down (Caulfield 1983: 189).

A later, 2012 Division of Subsistence report on the Yukon Flats cited Caulfield's observation that residents of Fort Yukon, unlike other Yukon Flats communities, do not limit their hunting areas to the area immediately around their community. This report, Technical Paper 377, was a collaborative research effort that included the Division of Subsistence, Council of Athabascan Tribal Governments and the Beaver Traditional Council. This report described possibilities similar to those described in 1983 as to why Fort Yukon is different. The 2012 report states that, "In spite of … overlapping hunt areas, no conflict between Fort Yukon moose hunters and hunters from other communities was reported. The area communities are composed of closely tied kin relations and friends who share hunting locations cordially" (Van Lanen et al. 2012: 36).

Boundaries are dynamic. Those listed here represent a snapshot in time and reflect the limitations of researchers; they are not static.

Harvest History

Moose harvest in Unit 25D remainder primarily occurs by harvest ticket under State and Federal regulation. As harvest tickets do not have a strict reporting requirement and can be used for general season hunts across the state, reported harvested should considered the minimum.

The average annual reported harvest in Unit 25D remainder from 2015-2024 was 27 moose. The total number of reported hunters during the same time period averaged 80/year with 74 being residents (**Figure 1;** Nelson 2025). Most of the reported moose harvest in Unit 25D remainder occurs during the 2nd and 3rd weeks of September (Caikoski 2014, 2018, 2024). However, as the State season closes Sep. 20, any harvest reported during the last week of September is by federally qualified subsistence users (i.e. Unit 25 residents except residents of Unit 25D west). Since 2024, federally qualified subsistence users may also harvest moose during the first two weeks of October.

Household surveys of all Unit 25D communities in 2008-2010 showed that the vast majority of moose harvest by local hunters occurs in September (~90%) with no harvest documented in October (CATG 2011; Van Lanen et al. 2012). Boats are the primary transport method used by moose hunters in Unit 25D remainder (Caikoski 2014).

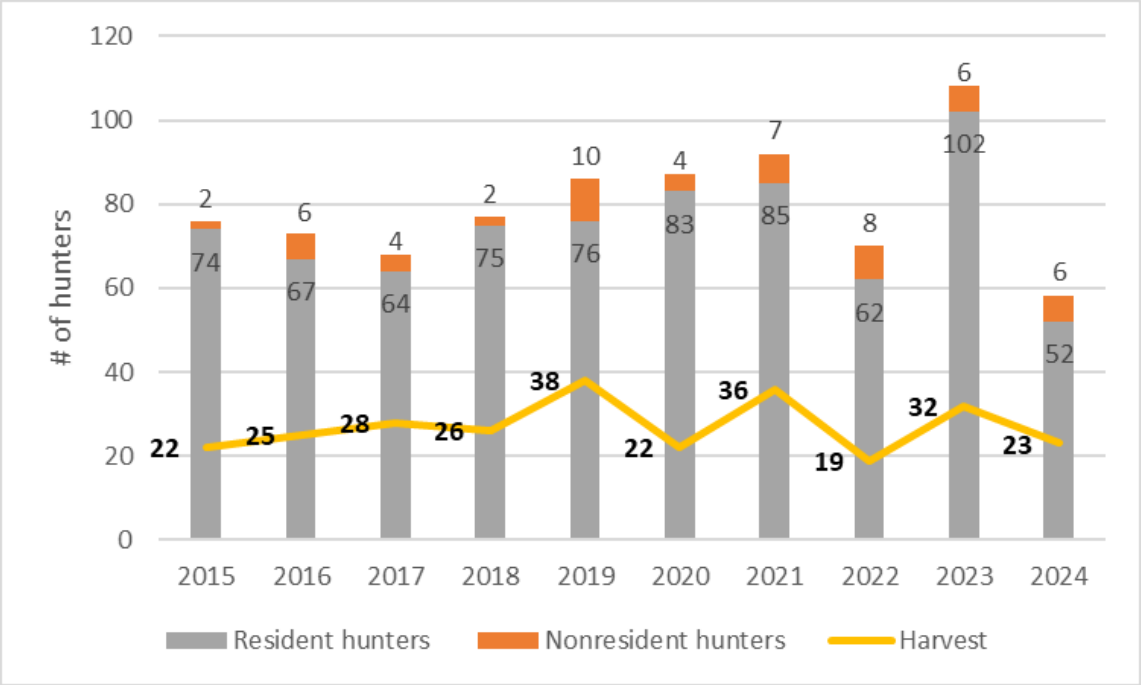


Figure 1 Reported moose harvest and number of hunters in Unit 25D remainder (Nelson 2025).

Alternative(s) Considered

One alternative considered was to establish a winter moose season of Feb. 18-28 to align with State regulations. Currently, Federal regulations have a December moose season, while State regulations have a February moose season in Unit 25D remainder. Establishing a February season under Federal regulations would provide additional opportunity for federally qualified subsistence users and would reduce regulatory complexity by aligning State and Federal winter seasons. However, this modification is outside the scope of the proposal.

Discussion and Effects

If Wildlife Proposal WP26-75 is adopted, Federal public lands in Unit 25D remainder will be closed to the harvest of moose by non-federally qualified users and all users that live outside Unit 25D remainder. Only federally qualified subsistence users, those with a customary and traditional use determination for moose in Unit 25D remainder, would be able to harvest moose on Federal public lands in Unit 25D remainder. This would decrease competition between user groups and could provide

more opportunity for federally qualified subsistence users to harvest moose in Unit 25D remainder, possibly enhancing the chances of successful hunts.

However, information on the number of moose harvested by federally qualified subsistence users vs. non-federally qualified user in Unit 25D remainder is currently unknown. While the majority of moose harvest in Unit 25D remainder occurs by Alaska residents, OSM is unaware how many of these are by rural vs. non-rural hunters. Additionally, non-federally qualified users would still be able to harvest moose on non-Federal lands in Unit 25D remainder, which notably, occur around most of the villages in the area (**Map 1**). Therefore, closure of Federal lands may worsen any existing user conflicts or competition issues by concentrating non-federally qualified subsistence users on the non-Federal lands close to villages. Furthermore, adoption of WP26-75 would close Federal lands during the State's February moose hunt. As there is no corresponding February hunt under Federal regulations, this would reduce opportunity for federally qualified subsistence users to harvest a moose from Federal public land during February.

Federally qualified subsistence users already have an additional 3.5 weeks of hunting opportunity in late September and early October when State seasons have closed. Federally qualified subsistence users also have 10 days of additional opportunity in December when State seasons are closed. They also have an additional 2 weeks of hunting opportunity in late August and early September before State seasons open, although as detailed in a previous OSM analysis for WP24-33, this early season opportunity is not very meaningful due to warmer falls, delayed rut, and concerns about meat spoilage.

Impacts to the moose population and conservation concerns are uncertain due to lack of data. The most recent biological data is now 10 years old.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP26-75

Justification

This proposal may provide increased opportunity for federally qualified subsistence users by reducing competition with non-federally qualified users for the entirety of the moose season. The Unit 25D remainder moose season was recently extended to close October 15 with the adoption of Proposal WP24-33 in 2024 to account for shifting weather patterns and delayed cooler weather conditions. The Federal fall moose season is currently 51 days, and federally qualified users only compete with non-federally qualified users during the open State season during 11 of those days from Sep. 10 – Sep.20. There has not been enough time since the October season extension to fully understand the impact it will have on the moose population and the ability of users to meet their subsistence needs in Unit 25D remainder.

Per §815(3) of ANILCA, restrictions on nonsubsistence uses is only authorized if necessary for the conservation of healthy populations or to continue subsistence uses of such populations. At this time, closure to nonfederally qualified users does not appear to be necessary for the conservation of healthy

moose populations or for the continuation of subsistence uses in Unit 25D remainder per §815(3) of ANILCA. There are no apparent indications of conservation concerns for the Unit 25D remainder moose population as well as no clear evidence that non-federally qualified users are negatively impacting it.

Additionally, federally qualified subsistence users already have a federal priority for moose in Unit 25D remainder through a substantially longer fall season as well as a December season. Adoption of WP26-75 may concentrate non-federally qualified users on non-Federal lands around communities during the State's September and February hunts. It would also reduce opportunity for federally qualified subsistence users to hunt Federal public land in February under State regulations.

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