STAFF ANALYSIS
TEMPORARY SPECIAL ACTION
WSA26-04

ISSUES

Temporary Wildlife Special Action Request WSA26-04, submitted by the Gates of the Arctic National Park Subsistence Resource Commission (SRC), requests to open a winter moose season within the Gates of the Arctic National Park (GAAR) in Unit 24A from Dec. 15–Apr. 15 with a harvest limit of one antlered bull with at least a one-inch antler for the 2026-2028 regulatory cycle (**Map 1**).

Proponent Statement

The proponent requested this Temporary Special Action due to the partial revocation of Public Land Orders (PLOs) 5150 and 5180 by PLO 7966. PLO 7966 allowed 2.1 million acres of Bureau of Land Management (BLM) lands in the Dalton Highway Corridor (DHC), which were top filed by the State of Alaska (SOA), to become State selected lands and no longer available for Federal subsistence priority as of March 27, 2026. The requested winter moose hunt will allow for Federal subsistence opportunity within GAAR, which is necessary because of the loss of opportunity on BLM lands.

The proponent stated no adverse effects are anticipated as there is a harvestable surplus of moose and harvest will only be shifted from BLM lands to National Park Service (NPS) lands. A winter season would allow for the use of snowmachines within GAAR to harvest a moose. There is currently a similar winter season in the adjacent Unit 24B. This Temporary Special Action is requested through the 2026-2028 wildlife regulatory cycle as a proposal can only be submitted for the 2028-2030 regulatory cycle.

The applicable Federal regulations are found in 36 CFR 242.19(b) and 43 CFR 51.19(b) (Temporary Special Actions) and state that:

> *. . . After adequate notice and public hearing, the Board may temporarily close or open public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for subsistence take, or close public lands for the taking of fish and wildlife for nonsubsistence uses, or restrict take for nonsubsistence uses.*

Existing Federal Regulation

Unit 24—Moose

Unit 24A—1 antlered bull by Federal registration permit (FM2405)	*Aug. 25–Oct. 1.*
Unit 24B, remainder—1 antlered bull by State harvest ticket OR	*Aug. 25–Oct. 1.*
1 antlered bull by State registration permit	*Dec. 15–Apr. 15.*
Federal public lands in the Kanuti Controlled Use Area, as described	

Unit 24—Moose

in Federal regulations, are closed to taking of moose Apr. 16-Dec. 14, except by federally qualified subsistence users hunting under these regulations

Proposed Federal Regulation

Unit 24—Moose

Unit 24A—1 antlered bull by Federal registration permit	*Aug. 25–Oct. 1.*
Unit 24A, within Gates of the Arctic National Park—1 antlered bull with at least 1" antler	***Dec. 15–Apr. 15.***
Unit 24B, remainder—1 antlered bull by State harvest ticket OR	*Aug. 25–Oct. 1.*
1 antlered bull by State registration permit	*Dec. 15–Apr. 15.*

Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose Apr. 16-Dec. 14, except by federally qualified subsistence users hunting under these regulations

Existing State Regulation

Unit 24−Moose

24A, within the Dalton Highway Corridor Management Area	*Residents: One bull by bow and arrow only by permit*	*DM920* *DM922*	*Sep. 1–Sep. 25*
	Non-residents: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side by bow and arrow only by permit	*DM920* *DM922*	*Sep. 5–Sep. 25*
24A, remainder	*Residents: One bull*	*HT*	*Sep. 1–Sep. 25*
	Non-residents: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side	*HT*	*Sep. 5–Sep. 25*

Unit 24−Moose

24B, remainder	*Residents: One bull*	*HT*	*Sep. 1–Sep. 25*
	OR		
	Residents: One antlered bull by permit available online or in person in Hughes, Allakaket, and Fairbanks beginning Dec 2	*RM833*	*Dec. 15–Apr. 15*
	Non-residents: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side	*HT*	*Sep. 5–Sep. 25*

Relevant Federal and State Regulations

§51.26(n)(24) Unit 24 (Code of Federal Regulations)

(ii) In the following areas, the taking of wildlife for subsistence uses is prohibited or restricted on public land:

(A) You may not use firearms, snowmobiles, licensed highway vehicles or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions of Units 20, 24, 25, and 26 extending 5 miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.

Sec. 19.40.210 Prohibition of off-road vehicles (Alaska Statutes)

(a) Off-road vehicles are prohibited on land within the highway corridor. However, this prohibition does not apply to

(1) off-road vehicles necessary for oil and gas exploration, development, production, or transportation;

(2) a person who holds a mining claim in the vicinity of the highway and who must use land in the highway corridor to gain access to the mining claim;

(3) the use of a snow machine to travel across the highway corridor from land outside the corridor to access land outside the other side of the corridor; this paragraph does not permit the use of a snow machine for any purpose within the corridor if the use begins or ends within the corridor or within the right-of-way of the highway or if the use is for travel within the corridor that is parallel to the right-of-way of the highway; or

(4) a person who must use land in the highway corridor to gain access to private property that

(A) is located outside the corridor; and

(B) has an established history of use as a homestead.

(b) Nothing in this section authorizes a person to access the land of another person unlawfully.
(c) The commissioner of transportation and public facilities may authorize facilities and access roads in the highway right-of-way and the commissioner of natural resources may authorize easements on state land within the corridor from the E. L. Patton Bridge north to the southern boundary of the North Slope Borough to facilitate access under (a)(1) — (4) of this section and to provide motorized access to
(1) adjacent federal land;
(2) Native allotments; and
(3) land conveyed to and held by Alaska Native corporations under the Alaska Native Claims Settlement Act.

5 AAC 92.530 Management Areas (Alaska Admin Code)

The following management areas are subject to special restrictions:

(7) the Dalton Highway Corridor Management Area:

(A) the area consists of those portions of Units 20 and 24 - 26 extending five miles from each side of the Dalton Highway, including the driveable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area;

(B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway Corridor Management Area is open to the take of furbearers and is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) repealed 6/23/2022;

(D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor Management Area;

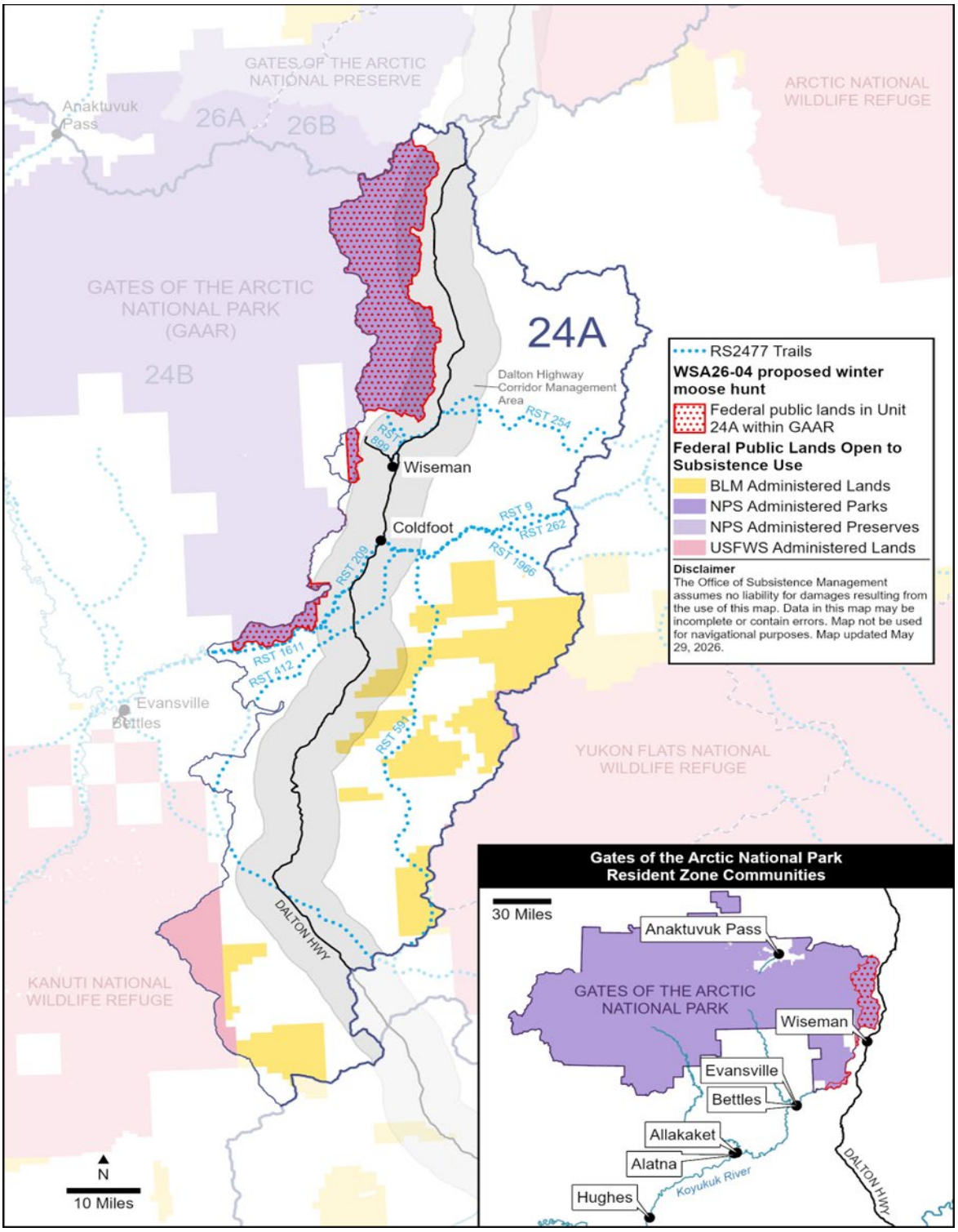
Extent of Federal Public Lands

As of April 2025, prior to the revocation of PLOs 5150 and 5180, Unit 24 was comprised of approximately 64% Federal public lands and consisted of 22% US Fish and Wildlife Service (USFWS), 21% BLM, and 21% NPS managed lands. Unit 24A contained approximately 70% Federal public lands that consisted of 58% BLM, 10% NPS, and 2% USFWS managed lands.

Since PLO 7966 partially revoked PLO 5150 and 5180, Unit 24A now contains 25% Federal public lands that consist of 13% BLM, 10% NPS, and 2% USFWS managed lands (**Map 1**). The requested hunt area within GAAR is comprised of 100% NPS lands.

Customary and Traditional Use Determinations

Residents of Unit 24, Koyukuk, and Galena have a customary and traditional use determination for moose in Unit 24. However, only Allakaket, Alatna, Anaktuvuk Pass, Bettles, Evansville, Hughes, and Wiseman are resident zone communities within GAAR, and only their residents would therefore be eligible to participate in the requested hunt. Residents of Coldfoot, Galena, Huslia, and Koyukuk would not be eligible to harvest moose in Unit 24A within GAAR.



Map 1. Proposed moose hunt area within GAAR in Unit 24A with updated land status and RS 2477 trails retained by the Alaska Department of Natural Resources (DNR) allowing snowmachine access to Federal public lands (DNR 2026b). RS 2477 trails refer to Revised Statute 2477, a now repealed federal mining law that granted states the right to construct highways over public lands.

Regulatory History

The Dalton Highway was constructed between 1974 and 1977 as a service road for the Trans-Alaska Pipeline and was afterwards used for delivery of supplies to Prudhoe Bay oil facilities (AKDOT 2017). In 1979, management was transferred to the State, and by 1994, the entire highway was open to the public (AKDOT 2017). In 1983, the State of Alaska established the Dalton Highway Corridor Management Area (DHCMA), an area five miles on each side of the Dalton Highway from the Yukon River to the Arctic Ocean that prohibited use of firearms and motorized vehicles for hunting purposes (ADF&G 2020). These restrictions were adopted because hunting pressure in the DHCMA was expected to increase as public access to the highway expanded (OSM 1992). This management area was incorporated into Federal regulations at the program's inception, aligning with the State until the Federal Subsistence Board (Board) adopted P92-128 in 1992, which granted federally qualified subsistence users' permission to hunt with firearms on Federal public lands within the DHCMA. In 1993, adoption of P93-48 modified it once again and allowed residents to utilize snowmachines for the take of wildlife on Federal public lands within the corridor. These actions were taken to support the traditional hunting practices of residents of Wiseman, Nolan, Bettles, Stevens Village, Allakaket, Alatna, Anaktuvuk Pass, and Kaktovik (OSM 1992).

In 2006, the Alaska Board of Game (BOG) adopted Proposal 49 at their statewide regulatory meeting (ADF&G 2006a). This proposal was submitted by the Alaska Department of Fish and Game (ADF&G) and requested to divide Unit 24 into 4 subunits. These subunits would allow for greater management efficiency due to the broad range of habitats found within Unit 24. Then at their 2006 Interior Region meeting, the BOG adopted Proposal 103, which aligned moose hunt areas with the new subunit boundaries (ADF&G 2006b).

In 2006, the Board adopted Proposal WP06-36 which created subunits in Unit 24 to maintain consistency with State regulations. They also adopted Proposal WP06-34 to change the closing date of the moose season in Unit 24, north and east of but not including the Koyukuk Controlled Use Area or Koyukuk National Wildlife Refuge from Sep. 25 to Oct. 1 and to require a Federal registration permit. An extended season provided additional subsistence hunting opportunity, and survey data indicated the Unit 24 remainder moose population could sustain a modest increase in harvest. The Unit 24A moose regulations have not changed under State or Federal regulations since 2006.

In 2018, the Board adopted WP18-35 to establish a winter moose hunt in Unit 24B from Dec. 15–Apr. 15 with a harvest limit of one antlered bull by State registration permit. The Board adopted this proposal as part of the consensus agenda. It increased subsistence opportunity, there were no conservation concerns, and aligned State and Federal regulations.

SOA statutes (Section 19.40.210) restrict certain motorized vehicles in the DHC. Snowmachines are not allowed on any SOA-managed lands within the corridor, except when crossing straight through from one side to the other. The Commissioner of the Department of Natural Resources (DNR) can permit easements on State land to allow access to neighboring Federal lands. Off-road vehicles may also be used from within the corridor to access private property located outside of it (see Relevant State and Federal regulations section above).

Current Events

The DNR is currently collecting public feedback regarding land access in the former PLO 5150 area. The primary objective is to identify existing travel routes and access points from within the DHC to Federal lands outside of the corridor. One of the stated goals of this process is to ensure that federally qualified subsistence users have sufficient access to adjacent Federal public lands (DNR 2026a).

The DNR Commissioner's Finding dated April 3, 2026, authorizes winter snowmachine use on certain rights-of-way within Alaska's DHC (DNR 2026b). This finding was meant to ensure continued motorized access for subsistence and other uses following the revocation of the PLOs 5150 and 5180. It intends to minimize adverse impacts on federally qualified subsistence users by allowing motorized access to Federal public lands outside of the DHC that would otherwise be restricted. The authorization applies to snowmachine use on recognized RS 2477 routes and is limited to Nov. 1–Apr. 15 to minimize impacts on land and waters (DNR 2026b).

A public hearing for this Temporary Special Action Request was held on June 10, 2026. No participants called into the meeting to provide comments.

Biological Background

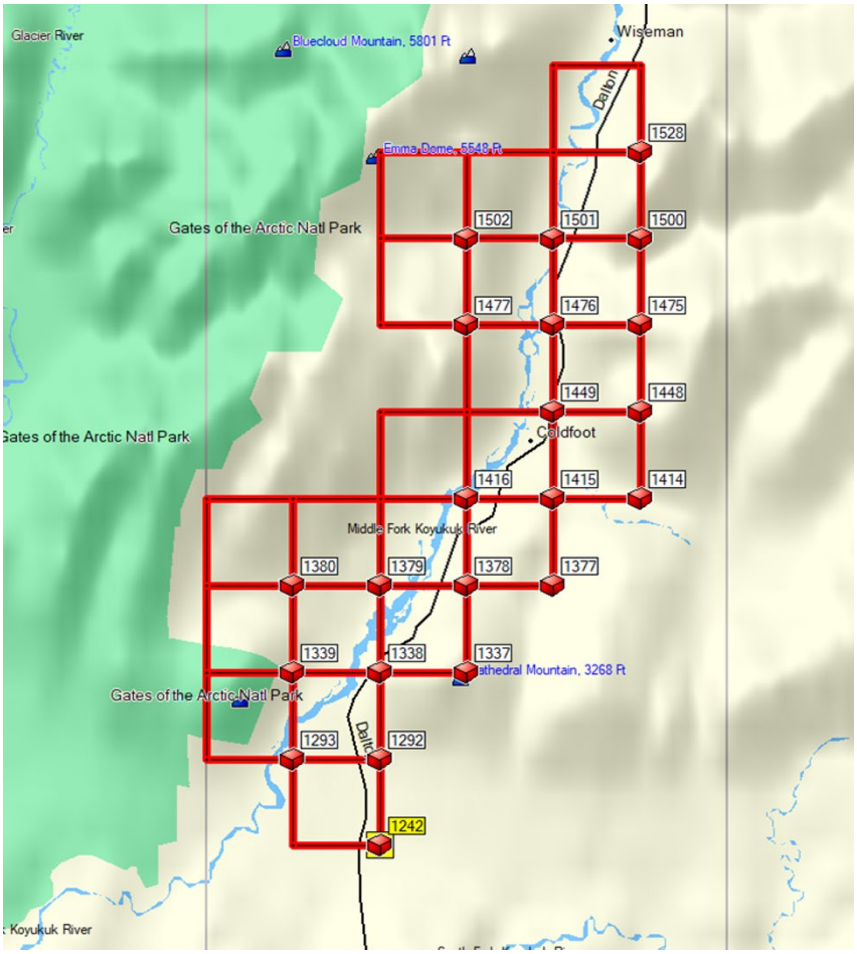
ADF&G manages moose in Unit 24 on a sustained yield basis to provide both hunting and other enjoyment of wildlife that minimizes disruption of locals' lifestyles. A moose intensive management plan was implemented by the ADF&G in Unit 24B from 2012–2018 to control wolf numbers and increase moose calf and yearling survival (ADF&G 2012). Overall management objectives for Unit 24 include maintaining a population of 11,000 moose, providing an annual harvest not to exceed 360 moose or 5% of the annual population estimate, and providing moose hunting opportunity not to exceed 500 hunters per regulatory year. Intensive management objectives for Unit 24A include maintaining a population of 1,200-1,500 moose and a harvest of 75-125 moose (Stout 2025).

ADF&G conducts Geospatial Population Estimator (GSPE) surveys in the fall in Unit 24B to estimate moose abundance. In Unit 24A, they conduct fall composition counts in cooperation with the BLM in the Middle Fork trend count area (TCA) (**Map 2**) to monitor changes in bull:cow and calf:cow ratios (**Figure 1**). There was a GSPE survey completed in 2004 that included a portion of Unit 24A, but a survey has never been completed that encompassed all of the subunit (Stout 2026, pers. comm.). The composition survey results are used to assess productivity, recruitment, and the effects of harvest (Stout 2025). The results of both these surveys are considered together and extrapolated to estimate moose abundance for Units 24A and 24B combined (Stout 2026, pers. comm.).

ADF&G models indicate the moose population trend was slightly increasing from 2010–2017 (Stout 2025). The 2019 and 2024 abundance estimates for Units 24A and 24B combined were 3,993 moose and 3,375 moose, respectively (**Figure 2**). Corresponding density estimates within the Middle Fork TCA in Unit 24A in 2019 and 2024 were 0.88 moose/mi^2 and 0.72 moose/mi^2, respectively (**Figure 1**) (Stout 2026, pers. comm.). Moose density within the Middle Fork TCA has exhibited a slightly declining trend from 2004–2024 (**Figure 1**).

Bull:cow ratios within the Middle Fork TCA from 2004–2024 ranged from 0–62 bulls:100 cows and averaged 41 bulls:100 cows, indicating bulls are not being overharvested (Stout 2025). Calf:cow ratios for the same time period and area ranged from 10–30 calves:100 cows and averaged 20 calves:100 cows (Stout 2026, pers. comm.). This metric may suggest a stable population (Stout 2025), as fall calf:cow ratios of 20–40 calves:100 cows are an indicator of a stable population (Franzmann and Schwartz 1998).

NPS has conducted two spring GSPE surveys in the eastern GAAR area. The entire survey area encompasses Units 24A and 24B north of Kanuti National Wildlife Refuge but only areas delineated as moose habitat are actually surveyed (**Map 3**). One of the smaller survey blocks analyzed, the Middle and North Fork Koyukuk River Drainage (KRD), surveys Unit 24A and the eastern portion of Unit 24B. The March 2022 KRD abundance estimate (most recent) was 637 moose with a density of 0.30 moose/mi^2 (**Table 1**). This estimate is higher than the previous survey conducted in 2015, which estimated 430 moose in the KRD subarea. Because ADF&G conducts their GSPE survey in the fall and the NPS has conducted their GSPE surveys in the spring, the two are not directly comparable. Differences in timing and survey areas may account for differences in density estimates. However, NPS abundance estimates for the KRD survey area correspond with ADF&G population trends for Units 24A and 24B of stable to increasing (Pruzenski et al. 2022).



Map 2. ADF&G Middle Fork Trend Count Area within Unit 24A (Stout 2026, pers. comm.)

Figure 1. ADF&G Middle Fork TCA aerial moose composition survey results 2004–2024 (Stout 2026, pers. comm.).

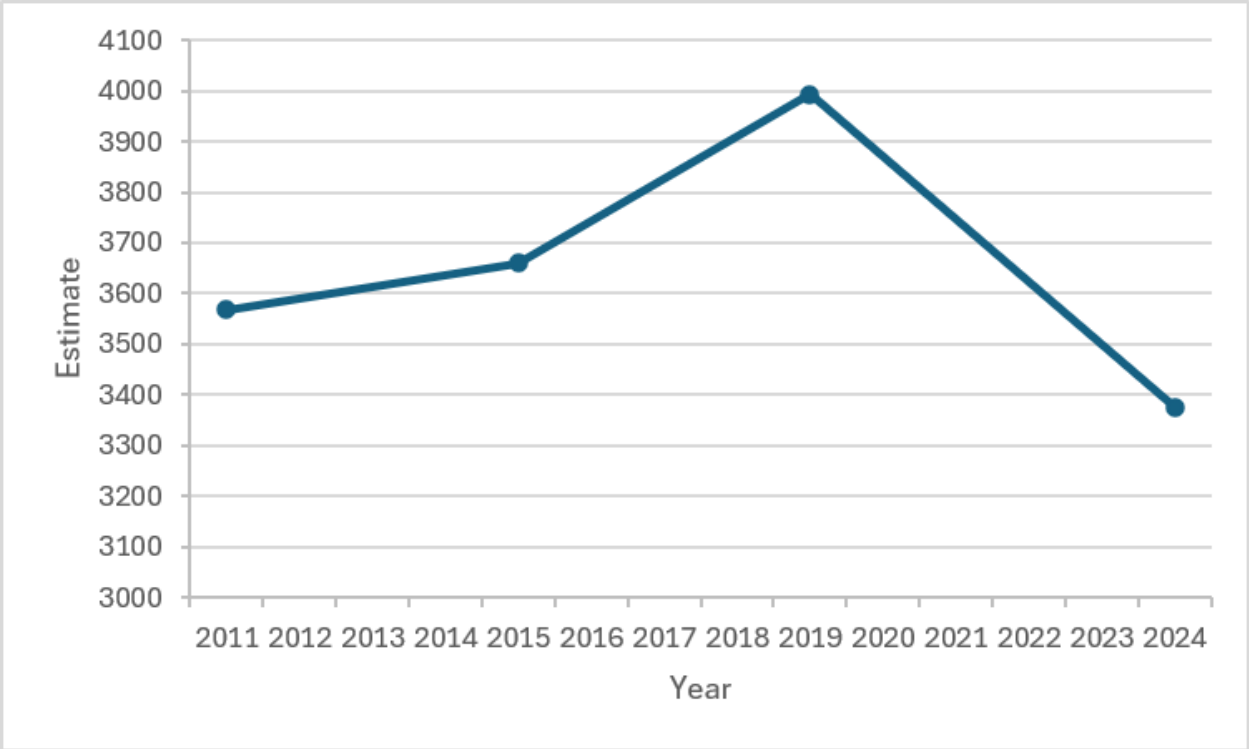
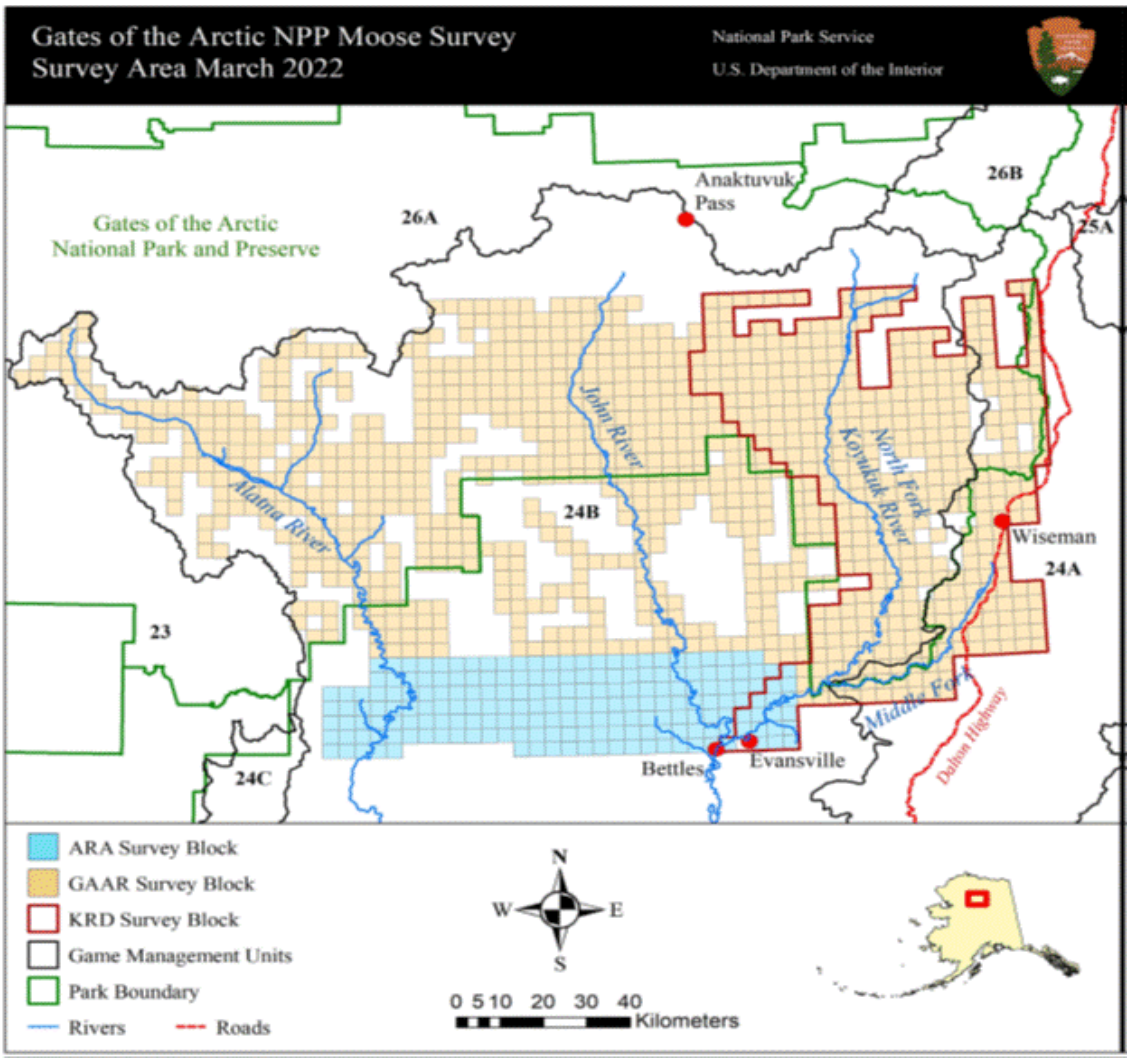


Figure 2. ADF&G Units 24A and 24B moose population estimates. GSPE survey results from Unit 24B are combined with composition survey results from Unit 24A and extrapolated over moose habitat area to arrive at combined estimate for Units 24A and 24B (Stout 2014, 2018, 2025, 2026 pers. comm.)



Map 3. GAAR moose survey blocks. White areas within the survey boundary were excluded as high alpine and non-moose habitat (Pruzenski et al 2022). The ARA survey block is the Ambler Road Area, which was delineated due to development possibility. The GAAR survey block informs NPS management decisions on park lands. The KRD survey block was delineated to inform BLM management decisions.

Table 1. NPS estimated abundance and density of moose in GAAR (Pruzenski et al. 2022). The entire area is the total of all survey blocks.

Survey Area	Year	Moose Estimate	Density (moose/ mi^2)
Entire area	2015	929	0.15
Entire area	2022	1,308	0.21
KRD	2015	430	0.20
KRD	2022	637	0.3

Cultural Knowledge and Traditional Practices

The Koyukuk River Valley and the foothills of the Brooks Range are the traditional territory of Koyukon Athabascans and Nunamiut Inupiat (Nelson et al. 1978). The region has long served as a center for trade of subsistence resources between Koyukon Athabascans, coastal Inupiat, and Nunamiut Inupiat (Clark and Clark 1976, Simeone 1980, Clark 1981). Gold rushes in the late 1800s brought Euro-Americans to the region and resulted in the establishment of new communities, including Wiseman and Coldfoot (Holen et al. 2012). Today, the subsistence practices of federally qualified subsistence users in Unit 24 continue to reflect these diverse cultural traditions and histories. The population size of communities eligible to harvest moose under Federal regulations in Unit 24 fluctuates seasonally (WIRAC 2026) but is estimated to range from around 10 to >400 residents per community (**Table 2**).

Customary and Traditional Use of Moose

Prior to the availability of caribou and moose in the region, Upper Koyukuk residents relied on small land mammals and birds (primarily hare and ptarmigan), black bear, salmon, Sheefish, and whitefish (Nelson et al. 1978, Marcotte and Haynes 1985). Caribou became more abundant in the region in the late 1800s whereas moose were first encountered in the region in the 1930s (Nelson et al.1978, Marcotte and Haynes 1985, FSB 1992). Over time, moose and caribou became dietary staples in the region (Nelson et al. 1978, Marcotte and Haynes 1985), though caribou have become more challenging to harvest since the construction of the Dalton Highway and Trans-Alaska Pipeline, which residents of some communities report as having changed caribou migration patterns, making them less available for consistent harvest (WIRAC 2025a, Holen et al. 2012).

Moose continues to be a critical resource in most Upper Koyukuk and Brooks Range communities today. Described as a ubiquitous and socially important subsistence resource, moose are harvested for their meat, hooves, heads, organs, bones, and hides, and are consumed both as a daily food and at potlatches (Brown et al. 2004, Wilson and Kostick 2016). Across communities, moose are often among the most harvested resource by weight (e.g., Holen et al. 2012). Based on the most recent year of subsistence harvest data available from communities that are federally qualified to harvest moose in Unit 24, 25–100% of households used moose (**Table 3**). The percentage of households harvesting moose in these communities was much lower (ranging from 0-60%), reflecting extensive sharing of this resource (**Table 3**). Use of moose was lowest in Anaktuvuk Pass and Coldfoot. In Anaktuvuk Pass, moose are often a supplemental resource harvested when caribou are scarce (Brown et al. 2016, Bacon et al. 2009, Brower and Opie 1996). In Coldfoot, residents reported low availability of large mammals in the year household subsistence harvest surveys were conducted (Holen et al. 2012). Additionally, because Coldfoot was a development node within the DHCMA, the land surrounding the community has historically been under State hunting regulations, which has shaped residents' hunting opportunities and practices (Scott 1993, Holen et al. 2012). Excluding these two communities, the estimated number of moose harvested per community ranged from 1–67, which provided an estimated 27–166 pounds of food per capita (**Table 3**).

Most harvest of moose in Unit 24 occurs during the fall hunt (Anderson et al. 1998, 2000, 2001; Brown et al. 2004; Holen et al. 2012). Nonetheless, winter harvest of moose is well documented (Anderson et al. 1998, 2000, 2001; Brown et al. 2004; Holen et al. 2012) and is especially important in years when fall

hunts were unsuccessful and/or when caribou are less available (Holen et al. 2012, WIRAC 2015, 2017b). As one Council member stated, winter hunts "provide an opportunity but it is not used very often. It's kind of a back-up season I think is the way we thought about it originally. If a hunter wasn't able to get their moose in the fall, this provided a winter opportunity" (WIRAC 2017b: 79). However, harvest of antlered moose during the proposed winter hunt will likely occur at low numbers. Antlered bulls are less common between mid-December through mid-March, and local ecological knowledge shared at Council meetings indicates that bulls tend to use less accessible, higher elevation habitats during winter (WIRAC 2015). Additionally, local subsistence users prefer to harvest caribou when possible because moose meat is tough in winter (WIRAC 2026).

Reports from Council members indicate that moose hunting has become increasingly difficult over the past decade due to predation from wolves and brown bears, challenging weather conditions, and increased hunting pressure from nonlocal hunters (WIRAC 2025a, 2025b). In recent years, repeated high-water events have also negatively impacted fall moose harvest (WIRAC 2022, 2023, 2024, 2025b). Additionally, Council members have reported concerns about rain-on-snow events negatively impacting calf survival and bull moose recruitment, increases in the number of nonlocal guided hunters, and increased hunting pressure from road construction crew members hunting near the DHCMA and surrounding areas (WIRAC 2023: 31, 2017b, 2025a). Alongside the reduction in Federal lands within the DHCMA, these pressures may make winter hunting opportunities more critical.

Hunt and harvest areas

Residents of Unit 24 communities, Koyukuk, and Galena rely on extensive hunting, fishing, and gathering areas across Units 24, 25, and 26. For members of resident zone communities, these harvest areas include lands within GAAR (Holen et al. 2012, Brown and al. 2015, WIRAC 2017a, Coleman et al. 2024). Although most subsistence resources are harvested near the community, residents commonly travel 100 miles or more to hunt large mammals (Wilson and Kostick 2016, Holen et al. 2012). Access to these harvest areas occurs by skiff, ATV, highway vehicle, and snowmachine, and transportation within the former PLO 5150 area has been identified as critical for "sustaining a subsistence-based lifestyle and inter-village travel" (BLM 2024a: 3-191).

Documented harvest areas indicate that residents of Wiseman and Coldfoot, in particular, hunt within and beyond the DHCMA, including extensive areas with GAAR and within remaining BLM lands east of the Dalton Highway (**Map 1**) (Scott 1993, Buzzell et al. 2007, Holen et al. 2012, BLM 2024c). Access to GAAR by residents of Wiseman occurs primarily in winter when snowmachines may be used, though in the past some residents would occasionally walk into park areas to harvest and pack out meat during fall (Scott 1993). The Wiseman, Nolan, and Hammond Roads and Wiseman Creek and Hammond River provide the main access to GAAR from the DHCMA (Holen et al. 2012, BLM 2024c, WIRAC 2026). In addition to residents of Wiseman and Coldfoot, residents of Allkaket also harvest moose and caribou along the DHCMA from mile 98 near Finger Mountain to Atigun Pass (WIRAC 2026).

Ethnographic investigation of Wiseman residents' hunting practices presented by Soctt (1993) demonstrated that local hunters adjusted harvest patterns in response to changing land management

policies. Prior to the establishment of GAAR, younger Wiseman residents commonly hunted in areas now within the park and in areas to the east of the community, while older residents hunted closer to the community (Scott 1993). Following the establishment of GAAR, hunters shifted efforts east of the DHCMA, to areas that remained accessible by aircraft and where it was legal to hunt with firearms. Once Federal regulations allowed hunting in the DHCMA with firearms, the corridor became the preferred area to hunt (Scott 1993). Given these past adjustments in hunting strategy, it is reasonable to expect that the recent changes in land status will shape local subsistence users' hunting activities, likely increasing reliance on GAAR as exemplified by this request.

In developing its 2024 Central Yukon Resource Management Plan (which was overturned in October 2025 [Public Law No: 119-50 (December 11, 2025)]), BLM concluded through an ANILCA Section 810 analysis that revocation of PLO 5150 and conveyance of these lands to the State of Alaska would, under regulations in place at the time, constitute extensive interference with access to and availability of harvestable resources (BLM 2024c: R-8). Specifically, this analysis stated that revocation of PLO 5150 would increase the time and effort local residents need to participate in subsistence practices, would block motorized access to lands used for subsistence within the PLO extent, and would severely restrict Wiseman and Coldfoot residents' access to federal lands for subsistence uses (BLM 2024a). While recent actions by State of Alaska have partially addressed access to adjacent Federal lands (see Current Events), testimony during ANILCA 810 hearings and Council meetings highlight that residents of Wiseman, Coldfoot, Bettles, Stevens Village, Rampart, Evansville, Allakaket, Alatna, and Anaktuvuk Pass will be impacted by the reduction of Federal lands within the DHMCA (BLM 2024c, WIRAC 2014, 2017d, 2026: 99). As such, Federal subsistence opportunities in other areas will likely be more critical than they may have been in the past.

Table 2. Estimated population of communities with a Federal customary and traditional use determination for moose in Unit 24. Values in parentheses reflect recent population estimates provided by a local resident (WIRAC 2026: 79). Communities in italics are those where residents are ineligible to hunt in GAAR.

Community	**2025 Population Estimate**
Alatna	11
Allakaket	158
Anaktuvuk Pass	426
Bettles	18
Coldfoot	*27 (10)*
Evansville	12
Galena	*434*

Community	**2025 Population Estimate**
Hughes	87
Huslia	*334*
Koyukuk	*75*
Wiseman	4 (13)
Total	**1,578**

Table 3. Most recent annual household harvest and use of moose by communities with a Federal customary and traditional use determination for moose in Unit 24. Communities in italics are those where residents are ineligible to hunt within GAAR (Coleman et al. 2024, Brown et al. 2015, 2016, Holen et al. 2012).

Community	**Year**	**% Using**	**% Harvesting**	**# Harvested**	**Lbs/capita**
Alatna	2011	100	33	4	77.1
Allakaket	2011	88	24	19	70
Anaktuvuk Pass	2014	28	6	5.6	9.5
Bettles	2011	75	25	2	90
Coldfoot	*2011*	*25*	*0*	*0*	*0*
Evansville	2011	85	8	1	27
Galena	*2010*	*85*	*41*	*67*	*85.4*
Hughes	2014	96	35	13	78.3
Huslia	*2022*	*96*	*363*	*42*	*80.4*
Koyukuk	*2022*	*91*	*27*	*16*	*121.5*
Wiseman	2011	100	60	4	166.2

Harvest History

Federally qualified subsistence users harvest moose in Unit 24A under Federal regulations by Federal registration permit FM2405. Harvest under this permit has averaged 3.9 moose/year from 2004–2024. Harvest success has been declining steadily over this same time frame (**Figure 3)**. In the first three years of this reporting period (2004-2006), harvest averaged 6 moose/year, while in the last three years (2022-2024), harvest averaged only 2.7 moose/year.

Harvest of moose under State regulations occurs throughout Unit 24 under draw permits, registration permits, and harvest tickets. Total estimated State moose harvest in all of Unit 24 averaged 312 moose/year from 2009–2025 (**Table 4**). Almost half of these moose (145 moose/year) are estimated as unreported harvest through the Division of Subsistence household surveys. Reported harvest averaged 167 moose/year for the same time period. Most of the Unit 24 moose harvest is concentrated in Unit 24D, with an average reported harvest of 88 moose/year. Unit 24B has the second highest average harvest at 36 moose/year, followed by Unit 24A with an average of 25 moose/year (**Table 4**).

No State harvest occurs in the portion of Unit 24A under consideration, as GAAR is not open to hunting under State regulations. State harvest does occur under two draw permits (DM920 and DM922) within the DHCMA in Unit 24A, but these permits are archery only. Most reported harvest ticket harvest in Unit 24A likely occurs on the east side of the DHCMA, as there is more land to the east of the management area.

State and Federal harvest occurs in Unit 24B during a winter season of Dec. 15–Apr. 15 under the RM833 permit. The RM833 permit is issued in low numbers; from 2015–2024, an average of 12.7 permits have been issued annually (**Figure 4**). Reported harvest under RM833 is even lower, averaging just 0.7 moose/year over the same time period (Stout 2026, pers. comm.).

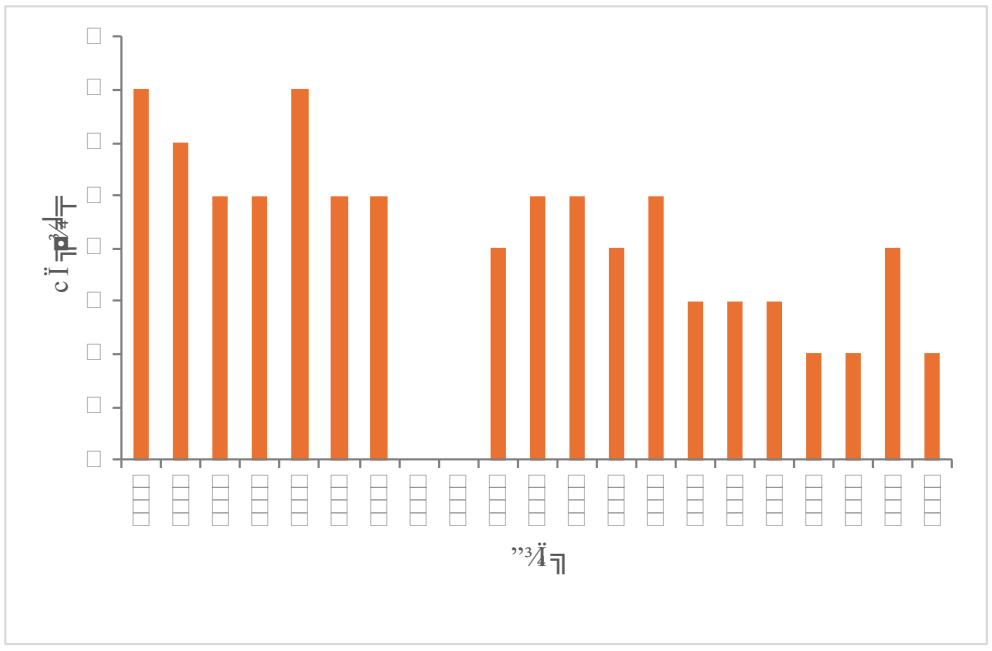


Figure 3. Federal moose harvest reported in Unit 24A under registration permit FM2405 from 2004–2024 (OSM 2026).

Table 4. Unit 24 State moose harvest (Stout 2026, pers. comm.). Total harvest column includes estimated annual unreported harvest of 145 moose/ year which is derived from Division of Subsistence household survey results and other sources. 2025 results are preliminary and may change if additional reports are submitted.

Regulatory year	Bulls	Cows	Unknown	Total harvest	24A	24B
2009	168	1	0	314	17	27
2010	183	3	3	334	23	33
2011	179	0	2	326	16	32
2012	158	0	1	304	20	39
2013	190	0	4	339	8	27
2014	158	0	0	303	19	49
2015	185	0	0	330	14	34
2016	178	0	0	323	23	32
2017	169	0	0	314	30	41
2018	177	0	0	322	22	29
2019	154	0	0	299	33	33
2020	160	0	0	305	27	32
2021	141	0	0	286	26	35
2022	150	0	0	295	44	41
2023	191	0	0	336	41	45
2024	136	0	0	281	41	45
2025	140	0	0	285		
Average	**165.7**	**0.2**	**0.6**	**311.5**	**25.3**	**35.9**

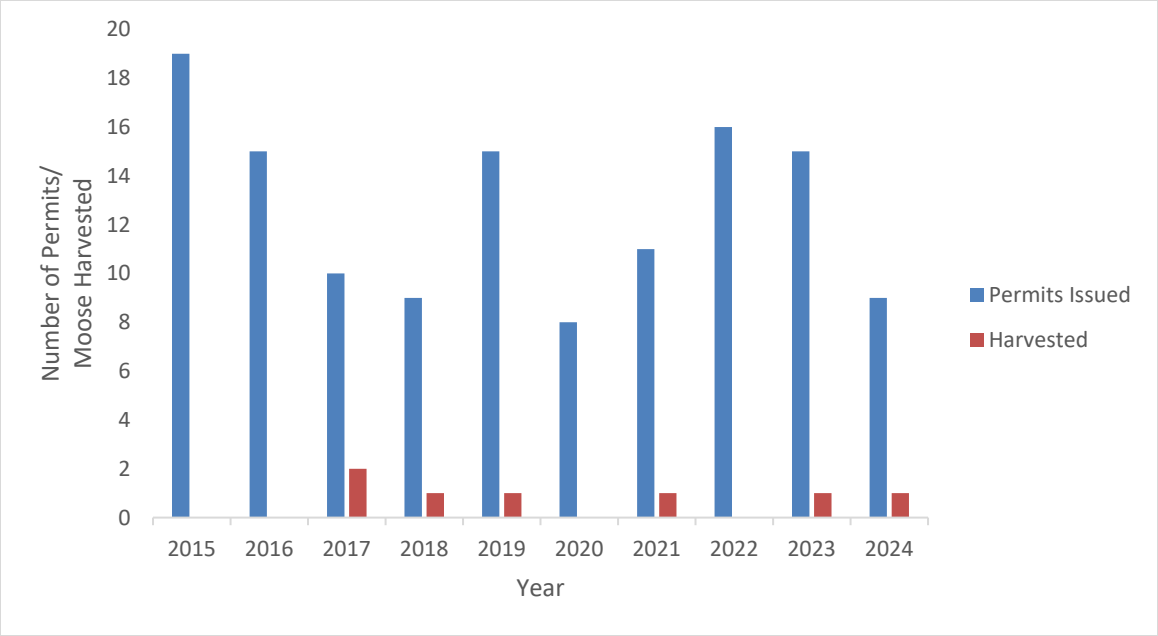


Figure 4. RM833 (Unit 24B State and Federal winter hunt) permits issued and successful harvest reported (Stout 2026, pers. comm.). Years showing no harvest had zero harvests reported.

Other Alternatives Considered

One alternative considered was to require a State or Federal registration permit for the requested hunt. A registration permit would improve harvest reporting and better track harvests during this proposed winter hunt. The RM833 State registration permit is required to hunt during the winter season in Unit 24B under both State and Federal regulations. Permission from the State to also use this permit for a winter moose hunt in Unit 24A would streamline permit and harvest reporting requirements. It would also make it easier for subsistence users who intend to hunt in both Units 24A and 24B during the winter season if they only need one permit. Alternatively, a new Federal registration permit could be created for the winter hunt or the FM2405 permit currently required for the existing fall hunt in Unit 24A could also be used for a winter hunt. However, if the FM2405 permit is used for this winter hunt, harvest data would no longer be comparable as the hunt periods would be different. The harvest data from 2026 on, would not be directly comparable to the 2000–2025 data set, complicating future analyses. This issue may also be encountered if trying to utilize the State RM833 permit for this hunt. Also, Federal managers who issue the permit and subsistence users obtaining the permit would need to understand eligibility requirements to hunt within GAAR. Of note, this eligibility issue within GAAR already occurs during the winter hunt in Unit 24B under the State RM833 permit.

An additional alternative considered involves expanding the hunt area from only GAAR lands to encompass all Federal public lands within Unit 24A. This expansion would include all BLM lands, which are accessible in winter via RS 2477 trails, and the portion of Kanuti National Wildlife Refuge located in Unit 24A (**Map 1**). Broadening the hunt area may enhance harvest opportunities and improve access to resources, offering non-resident zone communities, who are currently ineligible to hunt on GAAR lands,

opportunity to harvest moose in winter months. Furthermore, subsistence users would benefit from increased flexibility in planning their hunts, allowing for considerations such as safety, weather, and travel conditions. While extending the hunt area to all of Unit 24A could lead to greater harvest pressure on a moose population that exists at lower density, overall harvest pressure is anticipated to remain minimal. However, a modification of this scope should include greater Council and public input, which the limited review and shortened timeline of special actions do not provide. Because this temporary special action would only remain in effect through the 2027/28 regulatory year, and the proponent plans to submit a proposal during the 2028 wildlife regulatory cycle, waiting for the full proposal process would allow for a more thorough and appropriate evaluation of expanding the hunt area without significantly affecting subsistence opportunity. Additionally, the land transfer from BLM to the State of Alaska under PLO 7966 is not yet complete, and the status of Federal public lands may continue to change until the transfer is finalized.

Another alternative considered is to eliminate the 1" antler requirement. No other State or Federal hunt has this requirement as part of the harvest limit. The definition of "antlered" under Federal regulations at §51.25(a) "*means any caribou, deer, elk, or moose having at least one visible antler*."

Discussion and Effects

If this Special Action Request is approved, a winter moose season will be established within GAAR in Unit 24A for the 2026-2028 regulatory cycle. This season would provide additional opportunity for eligible federally qualified subsistence users to harvest moose. The new opportunity would partially replace opportunity lost within the DHCMA from the conveyance of BLM lands to the SOA. Winter moose hunting opportunities can be especially critical if fall moose harvests are unsuccessful, which local residents report has been increasingly common in recent years due to predation, hunting competition, and fall high water events. However, approving this Special Action Request as submitted will not fully replace opportunity lost to all communities, as Coldfoot, Huslia, Koyukuk, and Galena may not hunt within GAAR.

Moose harvest is unlikely to increase, as shifting hunting from easily accessible lands within the DHCMA in the fall to less accessible NPS lands in the winter will simply redistribute the harvest pressure. Furthermore, antlered bulls are harder to find during the winter as many bulls have already dropped their antlers, alleviating any conservation concerns. Additionally, local residents report bull moose tend to use harder to access, higher elevation areas in winter months, making high harvest pressure unlikely. Harvest pressure during the FM2405 hunt has historically been low and is anticipated to decrease further due to the reduction of BLM land in the DHCMA. Similarly, harvests in the winter hunt are expected to remain minimal. Although the Unit 24A moose population is stable but at low density, the bull:cow ratios are adequate and can support harvest.

Moose hunting within the DHCMA under State regulations is archery only and by draw permit only, whereas firearms could be used on the Federal public lands within the DHCMA under Federal regulations. ATV use is also prohibited within the DHCMA, prohibiting access to GAAR during the fall hunt. Establishing a winter moose hunt within GAAR when snowmachines can be used provides the best alternative opportunity for federally qualified subsistence users given the loss of the BLM lands.

OSM CONCLUSION

Support Temporary Wildlife Special Action Request WSA26-04 **with modification** to clarify the regulatory language and require a Federal registration permit.

The draft regulations read:

> **Unit 24—Moose**
>
> *Unit 24A—1 antlered bull by Federal registration permit* *Aug. 25–Oct. 1.*
>
> ***Unit 24A, within Gates of the Arctic National Park —1 antlered bull by Federal registration permit*** ***Dec. 15–Apr. 15****.*

Justification

Approving this request provides additional subsistence opportunities and presents no conservation concerns, given minimal harvest pressure and the fact that opportunity is only being shifted from one accessible area in the fall to another, less accessible area during the winter. The antlered bull harvest limit further mitigates conservation concerns. The rapid and unforeseen transfer of BLM lands to the SOA makes this action both appropriate and urgent. While access to the new hunting area may pose challenges due to DHCMA restrictions on motorized vehicles, recent actions by the DNR suggest an intention to maintain subsistence access to Federal public lands outside of the DHCMA.

The distinction of a 1” antler in the harvest limit is unnecessary as the definition of antlered in Federal regulation requires at least one visible antler. This is also consistent with harvest limits across the rest of Alaska under both State and Federal regulations. Requiring a Federal registration permit for this hunt will enable managers to track harvest and make more informed decisions.

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