

Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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In Reply Refer To:
R26070

AUG 04 2026

Maria Fosado, Refuge Manager
Northern Interior Refuge Complex
101 12th Avenue, Room 206
Fairbanks, AK 99701

Dear Manager Fosado,

The Western Interior Alaska Subsistence Regional Advisory Council (Council) writes to you to raise concerns about transporters operating within the Innoko National Wildlife Refuge (Innoko NWR). The Council requests more focused permitting requirements for transporters and transporter verification of necessary hunting requirements for nonresident hunters.

The Council met in Fairbanks February 24-25, 2026. During the meeting, Council members discussed continuing concerns with reports of wanton waste from transporter lead hunters operating in the region. Specifically, transporters staging out of McGrath and dropping off hunters into the Innoko NWR. This specific issue and area have been discussed at the last several Council meetings. The Council appreciates the U.S. Fish and Wildlife Service (FWS) increased law enforcement presence in the area during the 2025 season, especially considering that there are so few officers covering an area approximately the size of Texas. The Council requests additional action that will benefit enforcement officers and help conserve subsistence resources.

The Council considers the existing year-end reporting deadline for a special use permit that allows transporters to operate on the Innoko NWR too lenient and the information gathered inadequate. The Council requests updating the permit to require documentation of the information (listed below) and submission to the Innoko NWR in real time, either in writing, via email or orally via a phone call/voicemail to the Refuge.

When entering the field:

- Hunter(s) identity
- Carrying proof of completion of Alaska Department of Fish and Game Nonresident Moose Hunter Orientation for nonresident clients (see below)
- Time and GPS coordinates of location where hunter(s) were dropped off

When exiting the field:

- Time and GPS coordinates of location where hunter(s) were picked up

If moose were harvested, the following information is critical:

- Quantity and condition of game meat at the time of pick up
- Hunter(s) plans for the game meat that was removed from the field – will it be shipped out of the community or donated to the community nearest the field location?

The Council observed that poor meat handling in the field can also stem from inadequate preparation and education of hunters rather than deliberate actions. Improving hunter education and preparedness is vital to mitigating these issues. The Alaska Department of Fish and Game now requires nonresidents to take a Nonresident Moose Hunter Orientation course, which can be completed online¹, and proof of completion must be carried with the hunter in the field. The Council requests that Innoko NWR require transporters to verify nonresident clients have proof of passage of this course with them before they transport them into the field.

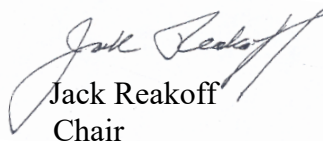
Access to timely information is essential for prioritizing enforcement activities during the moose season, especially across the vast areas managed by FWS. Data indicating hunter location and where issues repeatedly occur enables authorities to effectively focus law enforcement efforts.

Detailed reporting of transporter practices will identify operators linked to repeated occurrences of meat spoilage. Discussions at Council meetings indicate waste often occurs when transporters take on too many clients, resulting in delayed pickups—especially during frequent bad weather in fall. Enhancing the reporting requirements of transporters to operate within the Innoko NWR will assist in identifying and quantifying problem transporters as it is happening, and allow the Refuge the data necessary to take action to limit problem transporter operations on Federal lands.

Enhanced, real-time reporting requirements for air transporters operating in the Innoko NWR are necessary to address wanton waste, ensure timely enforcement, and support the conservation of local wildlife populations. Ensuring that transporters carry properly licensed and educated hunters into the field will be of great benefit in addressing these issues. These proposed measures will facilitate more effective management and enforcement operations and promote responsible hunting and transportation practices throughout the region.

Thank you for considering our comments. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff
Chair

¹ <https://www.adfg.alaska.gov/WildlifeConservationQuizzes/Details?id=7>

cc: Federal Subsistence Board
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