

WILDLIFE SPECIAL ACTION ANALYSIS
EMERGENCY SPECIAL ACTION
WSA26-13

ISSUE

Emergency Wildlife Special Action WSA26-13, submitted by the Northway Village Council, requests to extend the 2026 fall moose season in the portion of Unit 12 within the Tetlin National Wildlife Refuge and those lands within the Wrangell-St. Elias National Preserve north and east of a line formed by the Pickerel Lake Winter Trail from the Canadian border to Pickerel Lake (FM1203 hunt area) by 10 days, from Sept. 21-30, 2026.

“...In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses, or close public lands to take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses.”

Proponent Statement

The Northway Village Council respectfully requests an Emergency Wildlife Special Action extending the 2026 fall moose season for Federal Subsistence Hunt FM1203 from September 20 through September 30, 2026. This request applies to the portion of Unit 12 within Tetlin National Wildlife Refuge and federal lands within Wrangell-St. Elias National Preserve north and east of the Pickerel Lake Winter Trail from the Canadian border to Pickerel Lake.

Local hunters report that few moose have been seen or harvested during the current season. Warmer fall conditions and the later arrival of the rut have delayed bull movement into areas accessible to Northway hunters. Without an extension, many families may be unable to meet their subsistence needs. Moose is an essential traditional food source for Northway families. The continued closure or limitation of winter caribou hunting opportunities further increases food-security concerns in our remote community, where store-bought food is limited and costly.

The Federal Subsistence Board extended the FM1203 season in 2022 and approved extensions through September 30 for the 2024 and 2025 seasons. In approving those extensions, the Board determined that the additional harvest opportunity was sustainable and would provide federally qualified subsistence users a more meaningful opportunity to harvest moose. Because the current season closes September 20, we respectfully request expedited consideration so hunters receive adequate notice. Northway Village Council also intends to pursue a regulatory proposal for a longer-term solution during the next available wildlife regulatory cycle.

Current Federal Regulations

Unit 12—Moose

<i>Unit 12, that portion within the Tetlin National Wildlife Refuge and those lands within the Wrangell-St. Elias National Preserve north and east of a line formed by Pickerel Lake Winter Trail from the Canadian border to Pickerel Lake—1 antlered bull by Federal registration permit</i>	<i>Aug. 24-Sep. 20</i>
	<i>Nov. 1-Feb. 28</i>

Proposed Federal Regulations

Unit 12—Moose

<i>Unit 12, that portion within the Tetlin National Wildlife Refuge and those lands within the Wrangell-St. Elias National Preserve north and east of a line formed by Pickerel Lake Winter Trail from the Canadian border to Pickerel Lake—1 antlered bull by Federal registration permit</i>	<i>Aug. 24-Sep. 20 30</i>
	<i>Nov. 1-Feb. 28</i>

Current State Regulations

Unit 12—Moose

<i>Unit 12, remainder</i>	<i>Residents—One bull</i>	<i>HT</i>	<i>Aug 24–Aug 28</i>
			<i>Sep. 8–Sep. 17</i>
	<i>Nonresidents—One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side</i>	<i>HT</i>	<i>Sep. 8–Sep. 17</i>

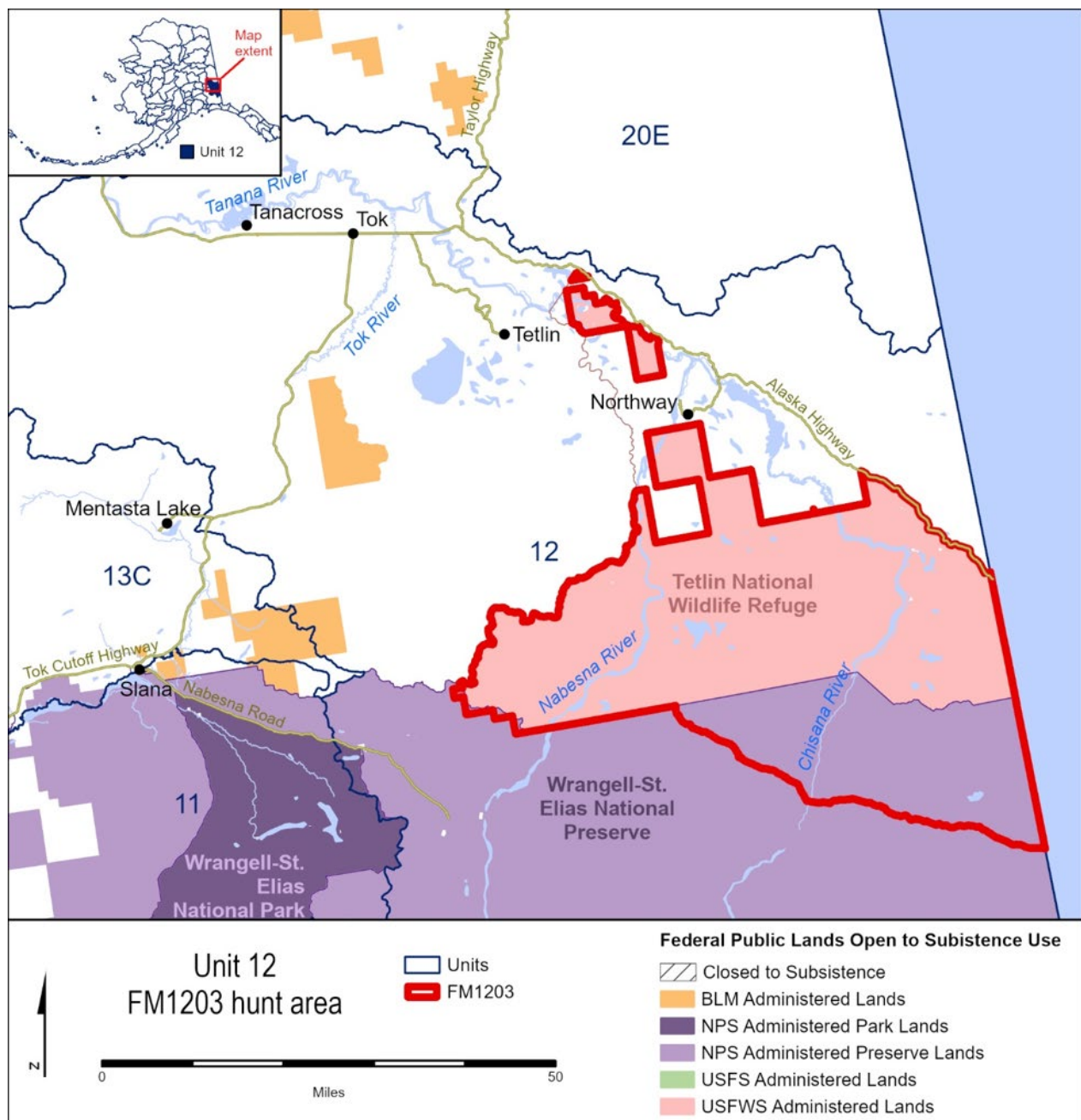
Extent of Federal Public Lands

Unit 12 is comprised of approximately 60% Federal public lands that consists of 48% National Park Service (NPS), 11% U.S. Fish and Wildlife Service (FWS), and 1% Bureau of Land Management (BLM) managed lands.

The FM1203 hunt area considered by this special action request consists of 100% Federal public lands that consist of 72% USFWS and 28% NPS managed lands (**Map 1**).

Customary and Traditional Use Determination

Residents of Units 12 and 13C, Dot Lake, and Healy Lake have a customary and traditional use determination for moose in the FM1203 hunt area.



Map 1. Map of the FM1203 hunt area.

Regulatory history

Federal and State moose hunting regulations in Unit 12 have changed numerous times since 1989. Federal seasons and harvest limits have most often been changed in response to the State's establishment, modification, and/or subsequent discontinuance of spike-fork seasons. The Federal regulations have also changed in response to the increased difficulties for federally qualified subsistence users to access moose.

In 1995, the Federal Subsistence Board (Board) adopted proposal P95-59, establishing the FM1203 Federal registration permit.

In 2001, the Board adopted Proposal WP01-41. Due to conservation concerns expressed by Alaska Department of Fish and Game (ADF&G) and the Tetlin National Wildlife Refuge (NWR), the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) submitted Proposal WP01-41, requesting changes to the fall season dates (from Aug. 15–Aug. 28 and Sep. 1–Sep. 15 to Aug. 24–Aug. 28 and Sep. 8–Sep. 17) and removal of the August spike-fork season in the FM1203 hunt area (**Map 1**).

In 2007, the Board adopted WP07-57 with modification, which changed the winter season dates (from Nov. 20–Nov. 30 to Nov. 20–Dec. 10) in the FM1203 hunt area. There was no conservation concern due to the limited moose harvest in the area and stable moose population.

In 2012, the Board adopted Proposal WP12-71 with modification to extend the winter season in the FM1203 hunt area from Nov. 20–Dec. 10 to Nov. 1–Feb. 28 and extend the fall season from Aug. 24–Aug. 28 and Sep. 8–Sept. 17 to Aug. 24–Sep. 20 and required the FM1203 permit for both the fall and winter seasons. WP12-72 requested the FM1203 hunt area be administered through a joint State-Federal registration permit, this was modified to make the FM1203 permit for both the fall and winter moose season. With the State and Federal moose seasons being different within the area it was not practical to have the hunt administered through a joint registration permit. There were no known conservation concerns for moose within the FM1203 hunt area.

In 2018, the Board rejected Proposal WP18-55, which requested longer fall and winter harvest seasons for the FM1203 hunt area. This proposal was opposed due to conservation concerns over the low bull:cow ratios east of the Nabesna River.

In 2022, the Tetlin NWR Manager submitted Emergency Wildlife Special Action WSA22-03 request, on behalf of the Northway Village Council and Northway Natives Inc., requesting that the moose season closing date in the FM1203 hunt area be extended to September 30. The Board adopted WSA22-03 with the modification to extend the season to October 10. The request was received on September 23, 2022, after the end of the season, so the modification provided the additional 10 days that had been in the request. Local residents had observed that the beginning of the rut is starting later each year. Therefore, bull moose are not moving around in the area until later, making them less available for harvest. The Board noted that the harvestable surplus had not been met and the moose population could withstand additional harvest.

In 2024, the Wrangell-St. Elias National Park Subsistence Resource Commission submitted Temporary Wildlife Special Action WSA24-04 requesting that the moose season closing date in the FM1203 hunt area be extended to September 30 for the 2024/25 and 2025/26 regulatory years. The Board approved WSA26-04 stating that additional harvest opportunity during a 10-day extension was not expected to increase harvest beyond sustainable levels and would provide more meaningful opportunity for federally qualified subsistence users, many of whom reported having difficulties harvesting moose due to warmer fall temperatures.

Biological Background

In Unit 12, moose typically inhabit areas below 4,500 feet with extensive river margin (Maier et al. 2005; Wells 2014, 2016). Approximately 6,000 mi² is categorized as suitable moose habitat within the unit, with approximately 5,250 mi² available in the winter and 6,572 mi² available in the summer (Wells 2014, 2016, 2018a). The southern and western portions of Unit 12 include more high elevation mountainous areas and lowland valleys that are dominated by spruce forest that transition to shrub communities (Wells 2018a). Past research has shown that the Tok River drainage contains important habitat for moose in Unit 12 and that the lower Tok River valley, specifically, serves as an important wintering area for the species (Wells 2018a).

In Unit 12, browse surveys have been conducted periodically since the 1970s (Wells 2014). Although fire suppression has led to many areas of potentially good moose habitat becoming dominated by spruce forest, browse surveys have shown that use of preferred browse species in the unit is low relative to availability (Wells 2014). During these surveys, it was noted that early successional areas containing browse species were used far more than undisturbed areas containing browse species. Habitat was not found to be a limiting factor on the moose population in Unit 12, and habitat enhancement projects have been conducted to maintain quality habitat (Wells 2014, 2018a).

McNeeley and Shulski (2011) showed that an increase of 0.5-1.0 ° Celsius above average can delay the moose rut in central Alaska by 2-4 weeks. This delay in the moose rut can affect when moose start moving around and are more susceptible to harvest. Residents of rural Alaska have noted that the moose don't start moving around until the ground is frozen (McNeeley and Shulski 2011).

The State management objective for moose in Unit 12 is to maintain a post hunt ratio of 40 bulls:100 cows east of the Nabesna River (vast majority of the FM1203 hunt area, see **Map 1**), and a bull:cow ratio of $\geq 25:100$ in the remainder portion of the unit (Wells 2014, 2016, 2018a). The State intensive management objectives include a population objective of 4,000-6,000 moose unit wide and a harvest objective of 150-300 moose (Wells 2023). The Unit 12 moose population was estimated to be 5,300-7,500 moose as of 2024 (ADF&G 2024b).

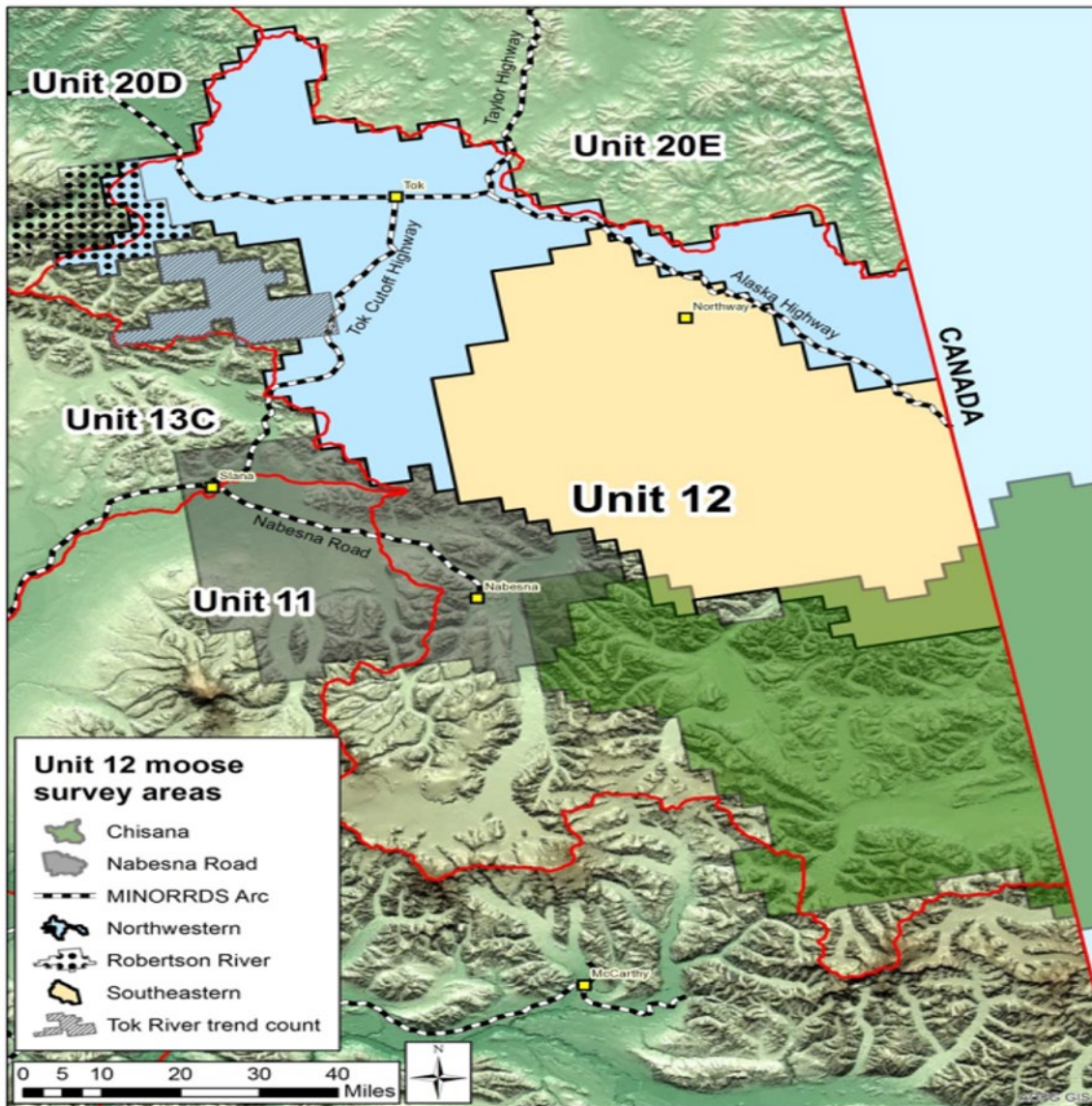
ADF&G, in cooperation with Tetlin NWR and the NPS, conducts periodic fall moose surveys throughout Unit 12, yielding population, density and composition estimates (Collins et al. 2005). The southeastern survey area corresponds to the FM1203 hunt area considered by this special action request (**Map 1** and **Map 2**; ADF&G 2017a). As surveys are only conducted in each survey area approximately every three or

four years, it is difficult to determine and respond to population trends in a timely manner (Wells 2016, 2018a).

Moose densities appear to have been relatively stable within the southeastern survey areas since 2008 (Figure 2; Wells 2016, ADF&G 2017a). Between 2003 and 2017, the moose population estimate in the southeastern survey area of Unit 12 ranged from 1,272-1,843 moose, corresponding to density estimates of 0.4-0.75 moose/mi². However, the 2025 survey dipped below average with an estimate of 797 moose with density estimate of .28 moose/mi². The survey estimated a density that was 30% lower than the previous lowest estimated density in 2022. The reason for the decline is unknown but does correlate with local observations (Jamison 2026).

Between 2003 and 2025, bull:cow ratios in the southeastern survey area were above the management objective of 40 bulls:100 cows, except in 2017 (**Table 1**). Over the same time period, calf:cow ratios have ranged from 12-48 calves:100 cows, with the lowest ratio occurring in 2022 (Table 1). 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 (Franzmann and Schwartz 1998).

Snow depth can affect overwinter moose mortality, affecting overall moose abundance. For example, the moose population in the northwest survey area of Unit 12 (adjacent to the proposal area) declined by approximately 24% between 2017 and 2022 but remained within management objectives. According to 2022 survey results, the bull:cow and yearling bull:cow ratios were stable, while the calf:cow ratio declined 50% from the 2017 survey (ADF&G 2024c). The 2022 survey was the first survey that was conducted after the extreme winter of 2021-22 (**Figure 1**), which may have negatively affected the population. While subsequent winters have had reports of heavier than normal snow in some areas of Unit 12, the moose population has likely not recovered to the 2017 population levels (ADF&G 2024c). With the population continuing to be within management objectives, there is currently no conservation concern.



Map 2. Survey areas used by ADF&G for moose surveys in Unit 12. Map is from Wells (2016, 2018a).

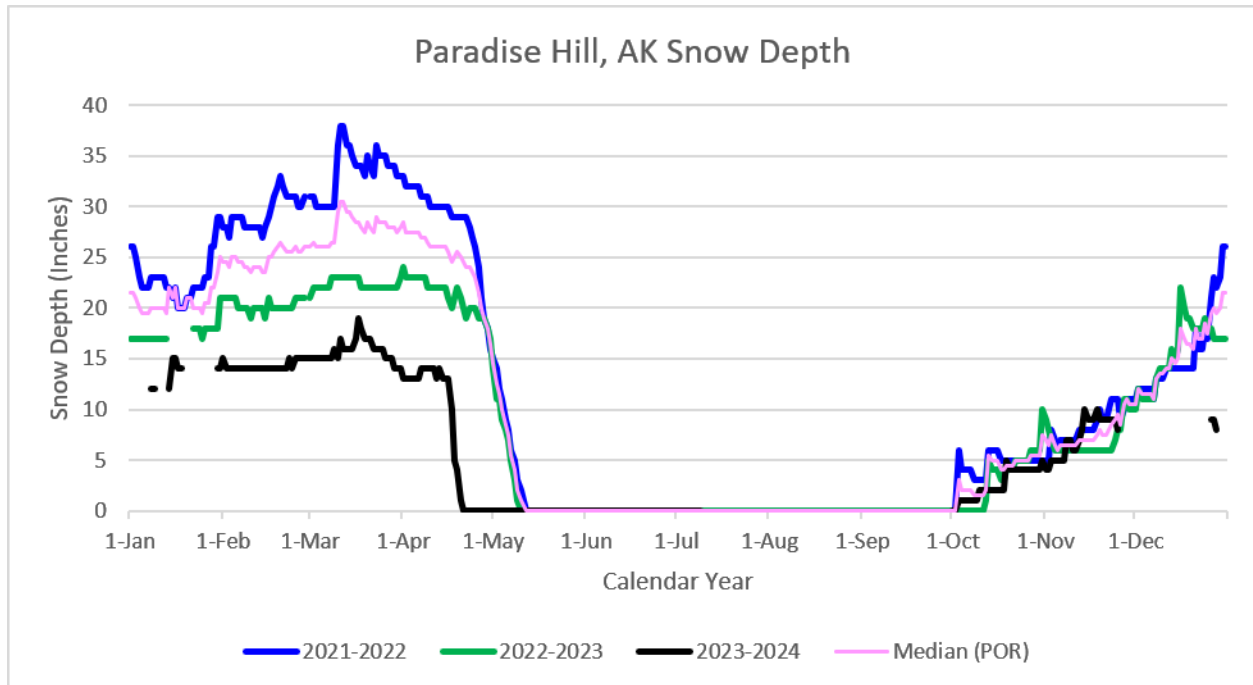


Figure 1. National Water and Climate Center Paradise Hill, AK weather station snow depth measurement for the winters of 2021-22, 2022-23, 2023-24, and the Median (period of record). This weather station is located along the edge of the FM1203 hunter area at 62.83°N, -141.41°W (NRCS 2024).

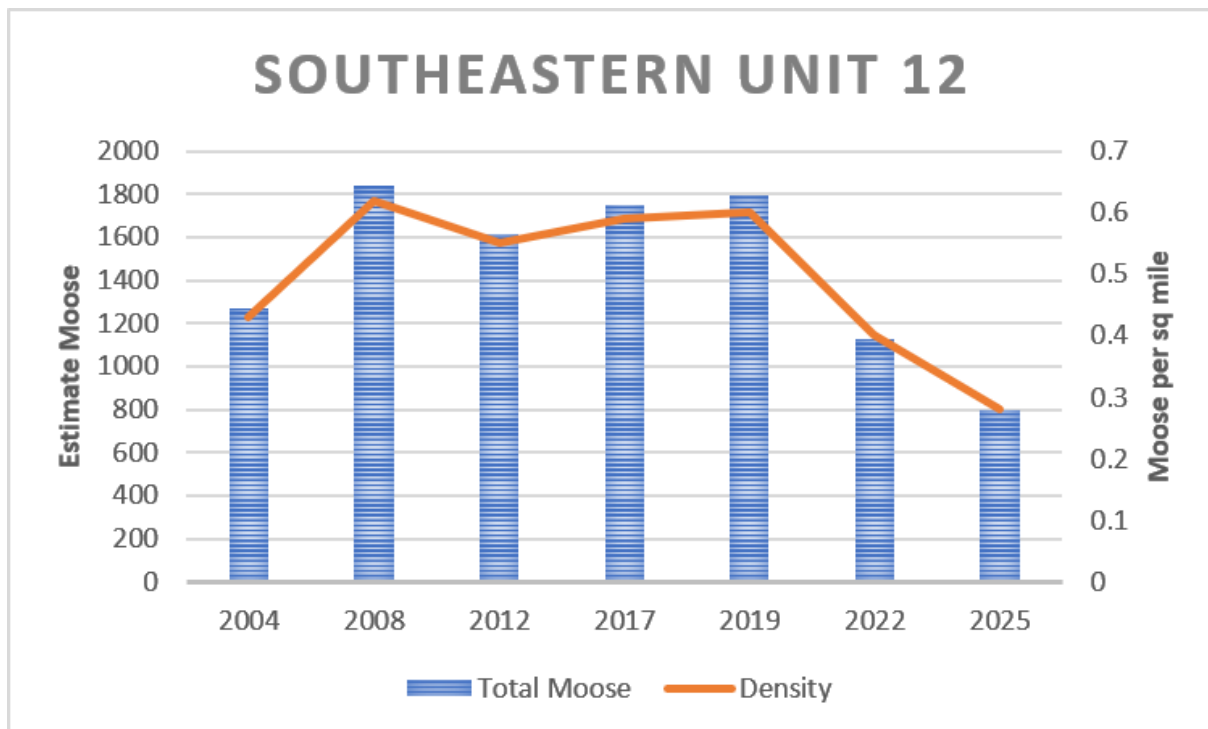


Figure 2. Unit 12 moose population and density estimates from 2004-2025 (Jamison 2026). Survey area boundaries for Unit 12 NW and Unit 12 SE survey areas were changed between 2019 and 2022 (Wells 2022).

Table 1. Fall aerial moose composition counts for the Southeastern survey area in Unit 12 from 2003-2025 (Wells 2014, 2016, 2018a; ADF&G 2018; Germain and Berg 2018; Lorenzini 2021, pers. comm.; Jamison 2024, pers. comm., Jamison 2026).

Survey Area	Year	Bulls:100 Cows	Calves:100 Cows	Percent Calves	Calves Observed	Adults Observed
Southeastern Unit 12	2003	89	33	16	89	475
	2004	70	48	20	89	351
	2008	62	24	13	81	552
	2012	52	18	9	65	634
	2017	35	25	16	64	395
	2019	54	28	15.3	74	515
	2022	54	12	5	28	321
	2025	57	28	12	23	252

Cultural Knowledge and Traditional Practices

It is critical that the communities of the Upper Tanana region harvest moose. The harvest of large land mammals (caribou and moose) has always been central to their subsistence economies and cultural identities (Easton 2021: 14, 17, 41-42, 45-48). In “An Ethnohistory of the Chisana River Basin”, ethnographer Norman Easton details the importance of subsistence harvest:

Within the Dineh [Athabascan] world, however, hunting is much more than a means to an end—it is an activity that reaches into practically every aspect of their biological, social, material, intellectual and spiritual lives. Hunting is the defining aspect of Dineh personal identity, social relations, moral values, in short, of their culture (2021: 45).

Easton describes the reciprocal relationships between humans and animals that is central to the physical and spiritual practice of the subsistence way of life. The interdependence among humans/humans and humans/animals is central to this way of life, maintains these relationships, and affirms Dineh/Athabascan identity.

Council members and other subsistence hunters describe a change in this relationship that is caused by climate change. They often describe this change as, the moose are “moving around later”, which refers to their observations of warm weather in fall which leads to delayed rut.

In 2011, a team of interdisciplinary researchers worked with the Athabascan residents of the Koyukuk-Middle Yukon area to learn how subsistence hunters are adapting to climate change. The people they worked with described similar observations of moose moving later and the researchers concluded:

Warmer temperatures cause the moose to start “moving” later, meaning they take longer to move from their summer areas to the fall and winter areas where hunters encounter

them for harvesting. This creates a “closing window” for hunters and harvest success because the timing of bull movements determines when and where they can be encountered on the landscape (McNeeley 2011).

The Upper Tanana Athabascans were traditionally semi-nomadic hunters and gatherers who moved seasonally throughout the year to harvest fish, wildlife, and other subsistence resources (Haynes and Simeone 2007). Whitefish, caribou, and moose have long been major resources that have been, and continue to be, key to the annual cycle of subsistence activities for most residents of the area (Haynes and Simeone 2007). As Haynes and Simeone (2007: 24) note, caribou have usually been more numerous and present for longer periods of time in areas north of the Tanana River, while waterfowl, muskrats, and whitefish have typically been more reliable subsistence resources in areas south of the river. Moose have traditionally been essential to Upper Tanana people during the period between the end of the summer whitefish fishery and the arrival of caribou in the fall (Godduhn and Kostick 2016). Moose have also been important sources of food during the late winter and early spring, when preserved fall caribou meat often began to run low, and muskrat and waterfowl were not yet available (Godduhn and Kostick 2016).

As Haynes and Simeone (2007: 31) describe:

Moose hunting in the fall was either an individual pursuit or group activity. A lone hunter might follow fresh moose tracks for hours or days and kill the animal after it bedded down. Several men sometimes hunted moose together, placing snares at intervals along a brush fence at the base of a hill. Some of the hunters positioned themselves at the opposite side of the hill before daylight, and then shouted at the approaching moose or set fires to drive the startled animal over the hill and into the awaiting snares. Hunters using bow and arrows killed animals not caught in the snares.

Winter moose hunting took place on foot with the use of snowshoes and the aid of bow and arrows (Reckord 1983; Haynes and Simeone 2007). The traditional practices of drying and freezing meat, as well as the proper and respectful treatment of harvested resources such as moose, are described in several ethnographic accounts of the Ahtna and the Upper Tanana Athabascans (de Laguna and McClellan 1981; Reckord 1983; Haynes and Simeone 2007). As the quintessential potlatch food, moose meat is central to Upper Tanana ceremonial life (NPS 1994).

In the early twentieth century, caribou was the predominant large land mammal subsistence species for the Upper Tanana Athabascans, providing meat for humans and dogs, as well as material for clothing, shelters, boats, netting, snares, and lashing (Godduhn and Kostick 2016). However, since the mid-twentieth century, changing migratory routes, hunting pressure, population declines, and ecological disturbances have resulted in a shift towards greater use and reliance upon moose (Godduhn and Kostick 2016).

Today, guns are used to hunt moose, which are pursued on foot, by boat, snowmachine, or ATV (Evans and Holen 2012, Godduhn and Kostick 2016). However, restrictions on the use of ATVs within the Tetlin NWR and Wrangell-St. Elias National Park have been a noted hindrance to subsistence moose hunting in these areas (Godduhn and Kostick 2016). In recent years, this Council and other Federal Subsistence

Regional Advisory Councils throughout the State have noted that the moose rut occurs later in the fall than usual. This is likely due to climate change which causes warmer weather well into September (EIRAC 2023b: 115-117). This often means that the animals do not move until later in the season, often after current hunting seasons have closed (EIRAC 2023b 119-122). This special action request is another response to this phenomenon.

In addition to changes in moose rut timing, council members and other residents of the Upper Tanana region have reported difficult winters in 2021-2022 and 2022-2023 (**Figure 1**). They observed deep, sometimes wet, snow and are concerned that these conditions have negatively affected moose populations, fish habitat and trapping (EIRAC 2020: 20, 25, 27; EIRAC 2023a: 36, 150; OSM 2023: 557)

Of the communities with a customary and traditional use determination for moose in Unit 12, hunters from Northway and Tok combined to account for approximately 95% of the FM1203 permits issued for hunting in proposal area between 1995 and 2023 (OSM 2024; see **Map 1**). Overall, moose were the primary large mammal harvested by residents of Northway and Tok during the subsistence studies conducted by ADF&G in these communities in 1987, 2004, 2011, and 2014 (see **Table 2**; ADF&G 2024a). Given that residents of Northway and Tok account for the vast majority of FM1203 permits issued, the remainder of this section focuses on the harvest and use of moose by residents of these communities. Some of the information given in this section of the analysis comes from an original Office of Subsistence Management analysis in support of the Board's customary and traditional use determinations for moose in Unit 12 (OSM 1997).

Both Northway and Tok are located in traditional Upper Tanana Athabascan homelands and present-day Unit 12. Contemporary Upper Tanana Athabascan communities are the modern manifestation of thousands of years of Athabascan occupation of the area. Indigenous knowledge describes this occupation “since time immemorial” and archeologists estimate that human occupation began after the “Last Glacial Maximum” between 17,000 and 14,000 years ago (Easton 2021: 1, 13-14).

For thousands of years, the Athabascan people were highly mobile and subsisted on a wide variety of available fish, wildlife, and plants whose populations fluctuate. According to Easton, “their settlements and camps were scattered about the land, providing them with places at which to secure the resources—animals, plants, water, and minerals upon which they depended upon for their survival” (2021: 30). Well established trail systems connected these places and the people who used them. Because these places and transportation routes were/are well situated for resources, early and later European settlers also used these places. As colonization progressed, these places became sedentary communities (Easton 2021: 30-34).

Northway is road-accessible and located approximately 50 miles southeast from Tok (also on the road system), the largest community in the region. In 2022, the estimated population of Northway was 223 people (ADCCED 2024a). The estimated population of Tok was 1,324 in 2022 (ADCCED 2024b).

Residents of Northway travel river corridors during moose hunting season, and moose hunting is often combined with migratory waterfowl hunting (Godduhn and Kostick 2016). From the period 1974 to 1984, Northway residents hunted moose mainly in Unit 12, but they also traveled more widely to nearby units

(NPS 1994). Tok residents typically traveled further to harvest moose than any of the other communities in the Upper Tanana area (NPS 1994).

Prior to the arrival of fur traders, gold miners, World War II, and increased human population pressure, people harvested moose when they needed meat, except during the rut (Easton 2021: 48, 57). Hunting regulations have led to a more limited timeframe for moose harvest. In recent history, moose have been taken in the fall by residents of both Northway and Tok, with September being a particularly important month for harvest (NPS 1994, Evans and Holen 2012, Godduhn and Kostick 2016). However, for the past several years, residents of the area have reported that warming temperatures associated with climate change have resulted in delayed moose movements typical of the rut (OSM 2018, 2022). This issue has made it difficult for residents to harvest sufficient moose before the end of the fall season and has motivated this request for regulatory action, as well as other recent requests to extend the fall moose hunting season in the proposal area (OSM 2018, 2022).

Moose have consistently ranked as the first or second resource in terms of bulk contribution to local subsistence harvests by residents of Northway and Tok during recent subsistence studies conducted by ADF&G (see **Table 2**). Studies conducted by ADF&G and Tanana Chiefs' Conference have also documented significant redistribution of moose meat through giving and receiving by residents of these two communities (TCC 1994 cited in OSM 1997, ADF&G 2024a). **Table 2** shows multiple measures of moose use by residents of Northway and Tok, and it includes estimates of all moose harvested by residents under any hunt opportunity (State or Federal) in any location during each study year.

ADF&G's most recent subsistence survey of Northway was conducted for the 2014 study year (Godduhn and Kostick 2016; **Table 2**). During that year, moose ranked second in terms of bulk contribution to local subsistence harvests, trailing only non-salmon fish (whitefish). This was also the case for the subsistence study conducted in Northway in 1987 (**Table 2**). In 2014, moose accounted for about 25% of all wild foods harvested by Northway residents, and it was the most used of all wild resources. However, during the same time period, some Northway residents reported being unable to harvest as many moose as needed. Competition with nonlocal hunters and predators was of great concern to these study participants, as it impacted their ability to successfully hunt both moose and caribou. ADF&G's 2014 study showed that the importance of moose to Northway residents' subsistence way of life may be increasing, as glacial thawing and associated siltation of local waterways has significantly impacted peoples' ability to harvest key non-salmon fish species like whitefish in recent years.

ADF&G's most recent subsistence survey of Tok was conducted for the 2011 study year (Evans and Holen 2012; **Table 2**). During that time, moose was the most significant species in terms of bulk contribution to residents' subsistence needs. Moose was also the most used resource by residents of Tok in 2011. Moose was also the most significant species in terms of bulk contribution to Tok residents' subsistence harvests in 2004 and 1987 (**Table 2**).

Table 2. Moose harvest and use by residents of Northway and Tok, as documented in subsistence studies (TCC 1994 cited in OSM 1997; ADF&G 2026).

Year	Community Population	Percent Using	Percent Attempting to Harvest	Percent Harvesting	Estimated Number of Moose Harvested	Estimated Harvest per Person (lbs.)	Rank in Contribution to Subsistence
<u>Northway</u>							
2014	194	96%	66%	24%	23	77	2nd
2004	263	58%	60%	50%	50	135	1st
1992-1993	-	-	51%	26%	17	-	-
1987	324	93%	82%	33%	38	75	2nd
<u>Tok</u>							
2011	1,312	70%	55%	28%	187	77	1st
2004	948	33%	66%	26%	90	67	1st
1987	1,081	63%	49%	24%	82	49	1st

Harvest History

Moose harvest in the hunt area covered by this special action request occurs under Federal regulations by Federal registration permit FM1203 and under State regulations by harvest ticket. State moose harvest is not limited to only the FM1203 hunt, therefore State harvest is for all of Unit 12.

The State sustainable harvest rate for moose in Unit 12 is 3–4% (Wells 2014, 2018a). The Unit 12 moose population is estimated to be 5,300-7,500 (ADF&G 2024b), yielding a harvestable surplus of 159-300 moose. For the Southeastern survey area of Unit 12 (which generally corresponds to the FM1203 hunt area), the harvestable surplus is 49-65 moose (3-4% of 1,627 moose). The Tok River drainage receives a considerable amount of the overall moose harvest in Unit 12 (Wells 2018a). Most of the unit is difficult to access, which leads to those areas near roads and rivers receiving higher harvest pressure than the rest of the unit.

Between 2006-2025, an average of 122 moose per year were reported harvested in Unit 12 by State harvest ticket (**Table 3**; ADF&G 2019b, 2022, 2024b). In 2025, only 98 moose were reported harvested in Unit 12 by harvest ticket under State regulations (**Table 3**; ADF&G 2026). Success rates for this hunt have averaged 25% since 2006.

Reported harvest and success rates under the Federal FM1203 permit are very low. Between 2016 and 2025, the harvest success rate for the FM1203 permit hunt averaged 4.9% per year. Since 2016, an average of 83 FM1203 permits have been issued annually, with an average of 1.9 moose harvested per year. However, only three moose total have been reported harvested under the FM1203 permit since 2021. In 2022, when the FM1203 season was extended to October 10, via WSA22-03, only one moose was reported harvested. In 2023, only 65 permits were issued for the FM1203 permit hunt and no harvest

was reported. In 2024, the Board approved WSA24-04 that extended the season to September 30 for the 2024/25 and 2025/26 regulatory years. One moose was reported harvested in both seasons combined (**Table 4**).

In 2025, a total of 99 moose were reported harvested by State harvest ticket and FM1203 (**Table 3** and **4**). This falls well below the current unit-wide harvestable surplus estimates.

Table 3. Reported general season moose harvest in Unit 12 according to the ADF&G harvest reporting database (ADF&G 2026).

Year	Unsuccessful Hunters	Successful Hunters	Bulls Harvested	Cows Harvested	Unknown
2011	371	112	112	0	0
2012	456	126	123	0	3
2013	526	100	99	0	1
2014	444	169	168	0	1
2015	498	163	163	0	0
2016	476	139	139	0	0
2017	553	135	135	0	0
2018	476	104	104	0	0
2019	520	137	137	0	0
2020	461	127	125	0	2
2021	443	113	111	0	2
2022	571	103	102	0	1
2023	461	92	92	0	0
2024	524	115	115	0	0
2025	491	98	97	1	0
Average	484.7	122.2	121.5	0.1	0.7

Table 4. Reported harvest for Federal Permit FM1203 (OSM 2022, 2024, 2026).

Year	Permits Issued	Hunted	Harvested	Success Rate %
2016	88	39	3	7.7
2017	98	48	6	12.5
2018	98	43	1	2.3
2019	99	47	4	8.5
2020	98	25	2	8.0
2021	79	34	0	0
2022	90	35	1	2.9
2023	65	13	0	0
2024	69	26	1	4
2025	46	23	1	4
Average	83	33.9	1	4.99

Other Alternatives Considered

One alternative considered was to extend the fall season by 10 days following the date the Board may approve this request. Due to the timing of when this request was submitted, and the time required to process, analyze, and vote on special action requests, the Board will not act on this request until after September 20. A similar situation occurred in 2022 when the Board extended the FM1203 moose season to October 10 because the request was received on September 23, 2022, after the end of the season. Board action in 2022 provided the additional 10 days requested by the proponent.

Discussion and Effects

If this request is approved, the moose season in the FM1203 hunt area of Unit 12 would be extended by 10 days, closing September 30 for the 2026 season. This would increase opportunity by allowing federally qualified subsistence users additional time to harvest moose during the 2026 fall season and may help them better meet their subsistence needs, as climate change appears to be delaying moose rut and impacting harvest success.

Additional moose harvested due to extending the season is not expected to increase harvest to unsustainable levels. Reported harvest under the FM1203 moose permit has been extremely low and total reported harvest estimates are below the estimated unit-wide harvestable surplus. Additionally, the bull:cow ratio in the hunt area is above management objectives.

If approved, this request will only extend the FM1203 moose season for 2026. To extend the season for additional years and for the season extension to become codified in Federal regulation, a proposal would need to be submitted during the next call for wildlife regulatory proposals in early 2027.

OSM CONCLUSION

Support Emergency Special Action WSA26-13 **with modification** to extend the season by 10 days following the date of Board approval of this request.

Justification

Federally qualified subsistence users in Unit 12 have struggled in recent years to meet their subsistence needs for moose, due to warming fall conditions and later arrival of the rut. Extending the season by 10 days provides additional meaningful opportunity for federally qualified subsistence users to harvest moose. Due to low harvest rates and adequate bull:cow ratios, no conservation concerns exist. The FM1203 fall season was extended by 10 days in 2022, 2024, and 2025, providing additional subsistence opportunity and raising no conservation concerns.

The modification ensures an additional 10 days of hunting opportunity are provided given the timing of Board action.

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