



RESIDENT HUNTERS OF ALASKA

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Working hard to ensure our wildlife is managed sustainably with an emphasis on protecting and enhancing resident hunting opportunities!

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July 9, 2026

Resident Hunters of Alaska (RHAK)

Comments to the Alaska Board of Game

Special Meeting: Muskox, Archery, and Ambler Road — July 22-23, 2026

Proposals we support: 1-3

Proposals we oppose: 4

Proposal 4 – 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping. Close a 2-mile-wide corridor along the Ambler Road.

OPPOSE

Why is this Proposal Necessary?

As the proposal states, the *“proposed road is for commercial purposes only, is private, and access to it will be controlled by a locked gate that is staffed 24 hours a day, 7 days a week, 265 days a year.”*

This begs the question, if the public isn't allowed to use the road, just who are we trying to keep from hunting and trapping within this proposed corridor? It is typical on these types of projects that contractors and workers and commercial drivers are prohibited from hunting, fishing, or trapping while at remote work camps, working on a project, or transporting materials etc.

The Department should explain to the board what hunter/trapper user groups they are trying to prevent hunting and trapping within the corridor of the proposed road, and why it is necessary at this time.

One example of another private commercial road with access from the state's road system is the 49-mile-long Pogo Mine Road near Delta Junction. Prior to and after construction of the Pogo Mine Road there was no proposal from the Department to impose a no-hunting/trapping corridor along the road. The reason why is because it wasn't necessary. The public wouldn't be allowed to use the road, and neither would the contractors, workers, or those companies allowed access for transportation of goods and services to the mine.

No Biological or Conservation Concerns?

The Department states that “*the proposed road route would cross the historical range of the Western Arctic Caribou herd (WAH)*” – which is currently in significant decline – but makes no mention at all of how this road may potentially affect the WAH, other than to say that any effects on animal movements can be mitigated by reducing traffic and activity at certain times in certain places.

The Delong Mountains Transportation System road (DTMS), at 51 miles in length, is a much shorter private industrial road than the proposed Ambler Road that services the Red Dog mine in Unit 23. The Department’s own biologists have done studies on the effects of the DMTS on WAH migrations, yet there is no mention at all of this in the Department comments. At minimum, we would have expected more information on how this proposed road may influence WAH migration patterns.

Intersection of Waterways & the Proposed Road

The proposed road would cross many rivers that both locals and non-locals currently utilize for hunting and trapping. The Department addresses this “intersection of navigable waters and the corridor and permitted activities on the waterways” as an issue brought up by the public that may have to be addressed via future regulatory action. But the Department has already decided on what they want to happen with the intersection of these waterways with the proposed road: **they want hunting and trapping prohibited along these waterways within one mile either side of the road**. We don’t understand why the Department wants to shut down future hunting opportunities along these waterways.

Memorandum of Understanding Between the Parties

We have reviewed the Memorandum of Understanding (MOU) between the state, federal agencies, the Alaska Department of Fish and Game, Native corporation landowners, the Alaska Industrial Development and Export Authority (AIDEA), and Ambler Metals LLC.

- It also calls for a no-fishing corridor that would be under the purview of the Board of Fisheries, but we have not seen any proposal to that board.
- There is nothing in the MOU that speaks to any corridor closure along any future spur roads that will likely be developed to support local communities.
- There is also nothing in the MOU that speaks to a similar proposal to the Federal Subsistence Board to institute a corridor closure on federal lands for federally qualified subsistence hunters.

The board should address these issues.

Conclusion

This proposal is too far-reaching for a road that is yet to be funded and built and is very much an example of putting the cart before the horse. We recommend that the board vote this proposal down or take no action on it at this time. It just isn't necessary to impose a no hunting and trapping corridor closure for the public along an as-yet-to-be-built ***private*** industrial road. We've never had to do this on any other private industrial road before they could be built.

We want to be clear that our opposition to this proposal in no way means we are opposing development of the Ambler mining district and a road to access it. What we oppose is the closing of hunting and trapping in over 400 square miles of country where it is currently allowed, absent any known conservation or biological concerns.

Another concern we have is that the Department anticipates other issues to come up if this road is built and says in their comments that *"additional regulatory needs will be addressed through regularly scheduled board cycles, and other avenues when warranted."* We also expect other issues to come up if the road is built resulting in a slew of Agenda Change Requests (ACRs) to the board. It would seem better – should this proposal pass – to allow out-of-cycle proposals to come in just for these areas within Units 23 and 24 associated with the road.

Proposal 1 – 5 AAC 92.126 (b) Non-Intensive Management Predator Control Plans, Unit 26(B) Musk Oxen Recovery Area.

SUPPORT

RHAK supports efforts to curb grizzly bear predation on muskoxen on the north slope.

Proposals 2 & 3 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Allow the use of verifiers, clarifiers, and non-electronic scopes in hunts for big game restricted to archery only.

SUPPORT

Clarifiers are currently legal in most states and do not give any advantage to bowhunters. They allow archers with poor near-vision to better see the sight pins. Non-electronic scopes provide a clearer magnified view to assist archers with poor vision.
