

Alaska Department of Fish and Game Comments

Wildlife Closure WCR26-11/12

This is a review of the current closure to the hunting of moose by non-federally qualified users (NFQU) in the fall RM840 and winter RM843 registration moose hunt within Game Management Unit 22B, West of the Darby Mountains.

Position

The Alaska Department of Fish and Game (ADF&G) **SUPPORTS** the elimination of these two closures. The measures ADF&G and the Alaska Board of Game (BOG) have taken in managing moose populations in GMU 22B West makes it so that maintaining the closure in the area is unlikely to result in providing any additional harvest opportunity to FQUs. ADF&G is more than capable of sustainably managing the moose population in this GMU while providing reasonable opportunities for subsistence hunters.

ANILCA §1314(a) explicitly states: "Nothing in this Act is intended to enlarge or diminish the responsibility and authority of the State of Alaska for management of fish and wildlife on the public lands except as may be provided in Title VIII..." Title VIII provides only a narrow exception allowing the Secretary to restrict State-authorized harvest when necessary to meet the needs of federally qualified rural residents. Section 802(2) establishes the policy that "nonwasteful subsistence uses of fish and wildlife and other renewable resources shall be the priority consumptive use of all such resources on the public lands of Alaska **when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population...**" [emphasis added]. Section 804 reiterates this policy and establishes criteria to implement a priority when the above conditions are met. It does not authorize wholesale replacement of State management. Per §815(3) of ANILCA, "...restriction on nonsubsistence uses are only authorized when necessary for the conservation of healthy wildlife populations or to continue subsistence uses."

Background

Moose populations throughout the Seward Peninsula increased during the 1970s and peaked in abundance during the mid-1980s. Density independent factors, specifically severe winters, are believed to have caused the population to decline dramatically in the early 1990s.

The moose population in GMU 22B, West of the Darby Mountains has since persisted at lower densities compared to the peaks in abundance observed in the late 1980s.

The ADF&G, in cooperation with the Bureau of Land Management (BLM), completed an abundance survey in GMU 22B West of the Darby Mountains in 2016 resulting in an estimated abundance of 728 observable moose (90% CI: 609-848). The proportion of short yearlings within the population was estimated at 14%. Previous estimates of the proportion of short yearlings within the population indicated that recruitment was low, averaging 9% from 1999 to 2013.

The abundance estimate for the combined GMU 22B West / 22C survey area is 1416 observable moose (90% CI: 1181-1651). This suggests the population has experienced a 5% annual rate of

increase between 2016 and 2022. The resulting density for the GMU 22B/C area is 0.34 moose/mi². Composition estimates completed in GMU 22B West were obtained in 2025 with 52B:100C which is above management objectives.

In 2002, the BOG adopted a registration permit requirement for moose hunting in GMU 22B West of the Darby Mountains to prevent overharvest. Part of the stipulations for these two registration permits is that they are only available in person in Brevig Mission, Golovin, Nome, Teller, and White Mountain from July 25,-August 25 for the fall hunt and available in person in White Mountain and Golovin beginning December 1 for the winter hunt. Since that time ADF&G has administered both fall and winter registration permit hunts with harvest quotas and emergency order closures issued as need be to prevent overharvest. The quota for the fall RM840 permit was 23 bulls annually from RY2016 to RY2020. The quota for the winter RM843 registration permit hunt is based on estimates of the harvestable surplus for the hunt area and the total reported harvest during the fall RM840 season. The quota for this hunt averaged 9 bulls annually with a range of 7-13 bulls.

On average, 92% of the hunters that participated in the fall RM840 moose hunt in GMU 22B West of the Darby mountains from RY2016 to RY2020 were FQUs. During that same period FQUs harvested on average 88% of the moose taken annually during the fall RM840 hunt.

On average, 99% of the hunters that participated in the winter RM843 moose hunt from RY2016 to RY2020 were FQUs. During this same period, all of the moose harvested during the winter RM843 moose hunt were taken by FQUs. Residents of Golovin and White Mountain harvested on average 90% of the moose taken annually during the winter RM843 hunt.

Impact on Federally Qualified Users

If the closure is rescinded, it is highly unlikely that FQUs will be impacted by the addition of any NFQUs that may take advantage of hunting under RM840 and 843. As has been stated above an overwhelming majority of hunters utilizing state hunting opportunities are FQUs.

Impact on Other Users

If the closure is rescinded, there would be hardly any NFQUs who could take advantage of hunting under either state registration permits as they would need to be physically in one of the communities during the registration period.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game (BOG) has made positive customary and traditional use findings for moose in GMU 22.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOG to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for Moose in GMU 22 is 250-300 animals. The season and bag limit for GMU 22B is:

| <u>GMU/Area</u> | <u>Bag Limit</u> | <u>Open Season (Permit/Hunt #)</u> |
|-----------------------|---|------------------------------------|
| <i>Unit remainder</i> | <p><i>22B, Residents: One bull by permit available in person RM840 Sept. 1-14 in Brevig Mission, Golovin, Nome, Teller, and White Mountain from July 25-Aug. 25. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.</i></p> <p><i>OR</i></p> <p><i>Residents: One antlered bull by permit available in RM843 Jan. 1-31. person in White Mountain and Golovin beginning Dec. 1. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.</i></p> | |
| | <i>Nonresidents</i> | <i>No open season</i> |

^a Subsistence and General Hunts.

Special instructions: ADF&G administers registration permit RM840 and RM843 with harvest quotas. These seasons are subject to emergency order closures once the quota is met. Successful hunters are required to report their harvest within 2 days of the kill. Registration permit RM840 is only available in person at license vendors within the hunt area from July 25 to August 25. Registration permit RM843 is only available in person at license vendors in White Mountain and Golovin beginning in early December. The specific date the permits begin to be available varies annually and is published in the current edition of Alaska Hunting Regulations.

Conservation Issues

There are no conservation concerns with the elimination of these two closures.

Enforcement Issues

The elimination of these closures would result in less enforcement issues for the area.