

Alaska Department of Fish and Game Comments

Wildlife Closure WCR26-13, 14, and 15

This is a review of the closures of federal public land in Game Management Unit (GMU) 22D to moose hunting, except by residents of GMU 22C and GMU 22D.

Position

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** the elimination of these closures. Elimination of these closures on federal public land in the area is unlikely to result in any substantial changes to the harvest opportunity for federally qualified users (FQU). Modification of the closures to include a larger subset of residents identified as FQUs may increase opportunity for all FQUs. Retention of the closures is not likely to cause an increase in moose harvest by non-federally qualified users (NFQU) due to the restrictions on access to state registration permits.

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.

In cooperation with the Bureau of Land Management and the National Park Service, ADF&G completed an abundance survey throughout subunits of GMU 22D and 22E in spring of 2020. The GMU 22D estimate of abundance was 1,254 observable moose (90% CI: 1056-1451). The proportion of short yearlings within the population was estimated at 11%.

In 2002, the Alaska Board of Game (BOG) adopted a registration permit requirement for moose hunting in GMU 22D to prevent overharvest. Since that time ADF&G has administered both fall registration permit hunts under RM840 with harvest quotas. Emergency order closures were issued as needed once the harvest quota was reached. Winter hunts in the area may be announced if the harvestable surplus is not taken during the fall season and are administered as registration permit RM849. The quota for the fall RM840 permit hunt averaged 25 bulls a year from RY2016 to RY2020. The winter RM849 registration permit hunt was last administered in 2013.

The availability of registration permits for fall moose hunts in GMU 22D is limited. In 2020, the BOG directed ADF&G to limit the availability of registration permits for the fall RM840 hunt. Permits for this hunt are only available in person at license vendors within the hunt area from July 25 to August 25. The restriction has only been in place since RY2020: additional time will be needed to evaluate the effects of this restriction on hunter participation.

On average 89% of the hunters that participated in the fall RM840 moose hunt in GMU 22D within the Kougarok, Kuzitrin, and Pilgrim River drainages from RY2016 to RY2020 were FQUs. During that same period FQUs harvested an average of 87% of the moose taken annually from this area during the fall RM840 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 RM849. As has been stated above an overwhelming majority of hunters utilizing state hunting opportunities are FQUs.

Impact on Other Users

Restrictions on the availability of state registration permits make it highly unlikely that NFQUs will be impacted by the lifting of these closures.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game 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 22D is:

<u>GMU/Area</u>	<u>Bag Limit</u>	<u>Open Season (Permit/Hunt #)</u>
<i>GMU 22D, Kuzitrin River drainage (includes Kougarok and Pilgrim rivers), and Southwest area located west of Tisuk River drainage, west of the west bank of Canyon Creek beginning at McAdam's Creek continuing to Tuksuk Channel</i>	<i>One bull by permit available in person 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>	<i>RM840 Sept. 1-14</i>
	<i>OR One antlered bull by permit available online at http://hunt.alaska.gov or in person in Brevig Mission, Golovin, Nome, Teller, and White Mountain (a season may be announced Jan. 1-Jan. 31).</i>	<i>RM849 May be announced</i>
	<i>Nonresidents</i>	

*No open
season*

^a Subsistence and General Hunts.

Special instructions: ADF&G administers registration permit RM840 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 1 day of the kill. Registration permit RM840 is only available in person at license vendors within the hunt area from July 25 to August 25.

Conservation Issues

There are no conservation concerns with the elimination of these closures due to the structure of the state registration permits available to NFQUs.

Enforcement Issues

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