

Alaska Department of Fish and Game Comments

Wildlife Proposal WP26-51

This proposal would establish a federal draw permit hunt for muskoxen in Game Management Units (GMU) 21D and 24D.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal. Hunting already exists in GMU 21D and 24D under state regulations. Establishing a federal draw permit may increase the harvest of muskoxen in 21D and 24D as state muskox permit hunter success rates under DX080 are currently low.

Background

The Alaska Board of Game (BOG) adopted a proposal in 2020 to establish a muskox hunt in GMU 21D and 24D by draw permit only. This new hunting opportunity arose in response to increased numbers of muskoxen in the area as the Seward Peninsula muskox population expanded their range eastward into Units 21D and 24D.

The most recent composition estimates for muskoxen in the Nulato Hills Management Area (GMU 22A, 21D, 24D, and 22B East) was 56 mature bulls per 100 cows (MB:100C) which is above the management objective for the area. The MB:100C estimate for the Nulato Hills management area has been consistently above management objectives since the area was first surveyed in 2012.

Impact on Federally Qualified Users

If adopted, federally qualified users (FQU) would be able to apply for a federal draw hunt for muskoxen on federal public land in GMU 21D and 24D. Given that there is a negative Customary and Traditional Use determination for muskoxen in GMUs 21D and 24D, this hunt would be open to any FQU statewide.

Impact on Other Users

If this proposal was adopted, non-federally qualified residents of Alaska would have a decreased opportunity to hunt muskox in GMU 21D and 24D because the federal hunt would take away the amount of harvestable surplus to administer their own hunt.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game has made negative customary and traditional use findings for muskoxen in GMU 21D and GMU 24D.

The season and bag limit for 21D/24D muskoxen is:

<u>Unit/Area</u>	<u>Bag Limit</u>	<u>Open Season (Permit/Hunt #)</u>	
		<u>Resident^a</u>	<u>Nonresident</u>
21D/24D	One bull	Feb 1 - Mar 15 (DX080)	No open season

^a Subsistence and General Hunts.

Conservation Issues

If this proposal is adopted, there could be possible conservation concerns dependent on how well consultation occurs with ADF&G staff.

Enforcement Issues

If this proposal is adopted, there could be possible confusion amongst law enforcement on which system the hunter is operating. Since there is no closure on federal public land, both FQUs and NFQUs could be hunting for muskox under state or federal regulations.