

## Alaska Department of Fish and Game Comments

### **Wildlife Proposal WP26-54 and WCR26-09a, 09b, 09c**

This proposal would lift the closure to non-federally qualified users (NFQU) hunting for moose on federal public land in Game Management Unit (GMU) 22A.

### **Position**

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** this proposal. There is neither a biological reason nor a concern for prioritizing federally qualified users (FQU) as additional moose hunting opportunity exists on federal public land for NFQUs.

### **Background**

A recent moose abundance survey completed in GMU 22A in spring 2025 in the Unalakleet River drainage estimated the local population to be 972 moose [90% CI: 731-1212] which is above state management objectives of 600-800 moose. Additionally, the two most recent composition surveys, conducted in 2021 and 2025 indicate bull:cow ratios are well above management objectives (56B:100C+ since 2003). Given that all adjacent hunt areas in GMU 21D, 21E, and 18Z all have high density populations of at least 1.0 moose / mi<sup>2</sup>, it is likely that both GMU 22A North and 22A Remainder have sustainable populations of moose for non-federally qualified users to hunt. Harvest in GMU 22A Central is below the harvestable surplus despite several incremental liberalizations of the state regulations in the area at the 2017, 2020, and 2024 Region 5 Board of Game (BOG) meetings.

### **Impact on Federally Qualified Users**

Federal public land in GMU 22A is difficult to access and hunters would have to use aircraft to moose hunt on federal land so there would likely be little interaction between FQUs and NFQUs pursuing moose on federal public land.

### **Impact on Other Users**

There would be new opportunities for NFQUs in an area that has been closed to moose hunting by non-local users for decades. Nonresident guided moose hunts do exist in GMU 22A North and 22A Remainder but is regulated by the number of guides in the GMU. Nonresident guided hunters often donate most of their moose meat to the local community. There is no nonresident season for moose hunting under state regulations in that portion of GMU 22A in the Unalakleet River drainage.

### **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 Unit 22 is 250-300 animals.

The season and bag limit for 22A Moose is:

Area	Bag limit	Resident Season	Nonresident Season
22A Unalakleet	One bull	Aug 1 - Sept 30 (RM841)	No open season
	One antlered bull	Dec 1 - Feb 28 (RM844)	No open season
22A North	One bull	Aug 1 - Sept 30 (HT)	
	One bull with antler width 50 inches or greater or 4+ brow tines		Sept 1 - Sept 20 (HT)
22A Remainder	One bull	Aug 1 - Sept 30 (HT)	
	One bull with antler width 50 inches or greater or 4+ brow tines		Sept 1 - Sept 30 (HT)
	One antlered bull	Jan 1 - Jan 31 (HT)	

**Conservation Issues**

There are no conservation issues associated with lifting the closure so NFQUs have the opportunity to hunt for moose in GMU 22A. Currently moose populations in the area have increased with the bull:cow ratios well above management objectives. Current harvest is below what is considered sustainable for the area despite recent liberalizations in state regulations.

**Enforcement Issues**

There should be less enforcement issues associated with the passage of the proposal.