

## **Alaska Department of Fish and Game Comments**

### **Wildlife Proposal WP26-62a**

This proposal would recognize the customary and traditional (C&T) use of muskoxen in Game Management Unit (GMU) 22A by residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet and establish muskox hunting on federal public land by residents in those communities.

### **Position**

The Alaska Department of Fish & Game (ADF&G) is **NEUTRAL** on this proposal. Regarding the eligibility requirements for participation in the subsistence program provided under the Alaska National Interest Lands Conservation Act (ANILCA), ADF&G urges the Federal Subsistence Board (FSB) thoroughly and carefully review the data relevant to the 8 criteria for communities that lack a customary and traditional use finding.

### **Background**

The Board of Game (BOG) adopted a proposal in 2020 allowing muskox hunting in GMU 22A. 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 Unit 22A.

The state Tier II system exists to prioritize subsistence users when limited hunting opportunity exists for a game species. Since hunting was allowed for muskoxen in GMU 22A beginning in Regulatory Year 2021, only residents of 22A have been awarded Tier II permits for muskoxen under the 22A hunt (TX090).

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

If adopted, residents of those communities within GMU 22A would be able to hunt muskoxen on federal public land in addition to state land. However, other FQUs would then be prohibited from hunting under federal regulations for muskoxen in GMU 22A. The passage of this proposal could also cause confusion for residents of those communities as they would now need to be cognizant of which permit they need depending on the land status they are hunting.

### **Impact on Other Users**

If adopted, other users would not be impacted by these proposals as they are already prohibited from hunting for muskox on federal public land.

### **Opportunity Provided by State**

**State customary and traditional use findings:** The BOG has made positive customary and traditional use findings for muskoxen 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 muskoxen in GMU 22 is 100-150 animals. The season and bag limit for 22A muskoxen is:

<u>Unit/Area</u>	<u>Bag Limit</u>	<u>Open Season (Permit/Hunt #)</u>	
		<u>Resident<sup>a</sup></u>	<u>Nonresident</u>
22A	<i>One Bull</i>	<i>Aug 1 – Mar 15 (TX090)</i>	<i>No open season</i>

<sup>a</sup> Subsistence and General Hunts.

**Conservation Issues**

If adopted, there are no conservation issues associated with the passage of these proposals.

**Enforcement Issues**

If adopted, there could be enforcement issues as two different permits are needed depending on if you are on state or federal public land.