Alaska Department of Fish and Game Comments

Wildlife Proposal WP26-63

This proposal would consolidate Game Management Unit (GMU) 22D American (FX2208) and 22D Kuzitrin (FX2206) into a single hunt area and permit for muskox hunting in GMU 22D by federal permit.

Position

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** this proposal. There is no biological reason to manage these two hunt areas separately and collared muskoxen have been documented moving between the two areas.

Background

ADF&G began fitting muskoxen with GPS collars in 2021. That data indicates cow muskoxen move throughout Unit 22D, often back and forth between management units. This data suggests that GMU 22D Kuzitrin and GMU 22D American hunt areas are arbitrary. Given that muskoxen are sometimes scarce in either management area between years, combining the areas will increase opportunity and hunter success by allowing hunters to hunt muskoxen in the combined area rather than being restricted to one of the two management areas. This will also reduce unnecessary regulatory complexity.

Impact on Federally Qualified Users

If adopted the federal hunting regulations will be easier to understand by merging these two areas.

Impact on Other Users

If adopted, there would be no impact on resident Alaskans hunting muskox under state regulations.

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 muskoxen in GMU 22 and 23, that portion south and west of the Kobuk River drainage.

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 this area is 100-150 animals. The season and bag limit for GMU 22D is:

Unit/Area	Bag Limit	Open Season (Permit/Hunt #) Resident[a]	Nonresident
22D SW	*One bull*	*Jan 1 – March 15 (TX103)*	*No open season*
22D Kuzitrin	*One bull*	*Jan 1 – March 15 (TX102)*	*No open season*
22D Remainder	*One bull*	*Aug 1 – March 15 (TX102)*	*No open season*
		(*Permit type*)	(*Permit type*)

[a] Subsistence and General Hunts.

Conservation Issues

There are no conservation concerns associated with the passage of this proposal. As mentioned above, muskoxen have been documented moving between the two areas.

Enforcement Issues

Any enforcement issues associated with hunters using the wrong permit for either area should be alleviated with the passage of this proposal.