

**Wildlife Analysis
WP26-62b**

ISSUE

Wildlife Proposal WP26-62b, submitted by the Seward Peninsula Subsistence Regional Advisory Council (Council), requests to establish a hunt for muskoxen in Unit 22A to match the current State hunt, which has a harvest limit of one bull by Tier II drawing permit and a season of Aug. 1–Mar. 15.

Proponent Statement

The proponent states that the Alaska Board of Game established a muskox hunt in Unit 22A as the Seward Peninsula muskox herd has expanded into that area. This proposal would align Federal and State regulations, reducing regulatory complexity and the potential for confusion; provide additional subsistence harvest opportunity; and prevent Federal regulations from being more restrictive than State regulations.

The Council also submitted Proposal WP26-62a, which requests recognizing the customary and traditional uses of muskoxen in Unit 22A by residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet.

Current Federal Regulations

Unit 22A—Muskox

Unit 22, remainder

No open season

Proposed Federal Regulations

Unit 22A—Muskox

Unit 22A– 1 bull by Federal drawing permit or State permit

Aug. 1–Mar. 15

Unit 22, remainder

No open season

Current State Regulations

Unit 22A–MuskoX

Unit 22A *Residents: One bull by permit* *TX090* *Aug. 1–Mar. 15*

Extent of Federal Public Lands

Unit 22A is comprised of approximately 69% Federal public lands that consist of 57% Bureau of Land Management (BLM) and 12% US Fish and Wildlife Service (USFWS) managed lands.

Customary and Traditional Use Determination

The Board has not made customary and traditional use determination for muskox in Unit 22A. Therefore, all rural residents are eligible to hunt for muskoxen in Unit 22A, should a hunt be established.

Regulatory History

Please see the Regulatory History section in Proposal WP26-64 analysis.

In 2020, the BOG considered Proposal 31 at their Western Region meeting. This proposal requested to establish a muskox season in Units 22A, 21D, and 24D. The BOG deferred the proposal to their Interior and Eastern Arctic Region meeting since this proposal spanned two separate regions. The BOG amended Proposal 31 to affect only Unit 22A, require a Tier II permit, and to match season dates with what was already established on the Seward Peninsula. The Board shortened the requested season to match those already in existence to protect calves and calving cows.

Biological Background

Please see Biological Background section in Proposal WP26-64 analysis for general biological information on Seward Peninsula muskox.

As the Seward Peninsula muskox population has continued to grow and expand, more individual muskox groups have been found in the expanded count area. From 2010–2021, the muskox population in the expanded count area ranged from 258–473, averaging 361 muskoxen and accounting for about 17% of the total Seward Peninsula muskox population in 2021 (**Figure 1**, Gorn and Dunker 2015, Dunker 2017, 2022). Additionally, 147 or 53% of these muskoxen are found in the Nulato Hills count area within Unit 22A (Burch 2025, pers. comm.)

Composition surveys indicate stable and high ratios of mature bulls in the Nulato Hills count area between 2015 and 2024, ranging from 45–59 and averaging 54 mature bulls:100 cows (**Figure 2**, Carson 2025, pers. comm.). Short yearlings (SY) are muskox between 10 and 12 months old and provide a measure of recruitment and population growth. Composition surveys indicate a decrease in short yearlings in the Nulato Hills count area from the high in 2012 but remained relatively stable between 2015 and 2024. During the 2015–2024 period, short yearling:100 cow ratios ranged from 22–33 and averaged 27 short yearlings:100 cows (Carson 2025, pers. comm.) (**Figure 2**).

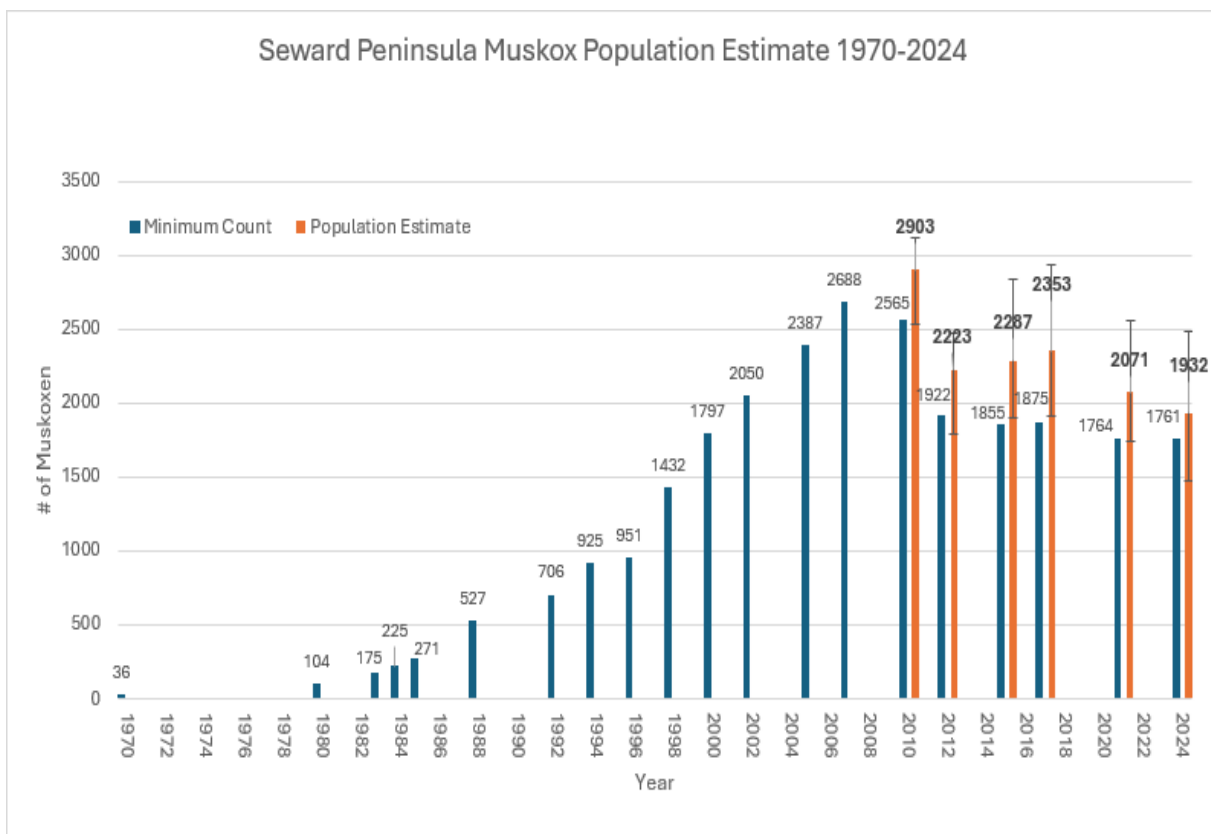


Figure 1. Population estimates for Seward Peninsula muskox. The results pre-2010 are from the minimum count surveys and post-2010 are from the distance sampling technique but still include the minimum count results (Carson 2025, pers. comm.).

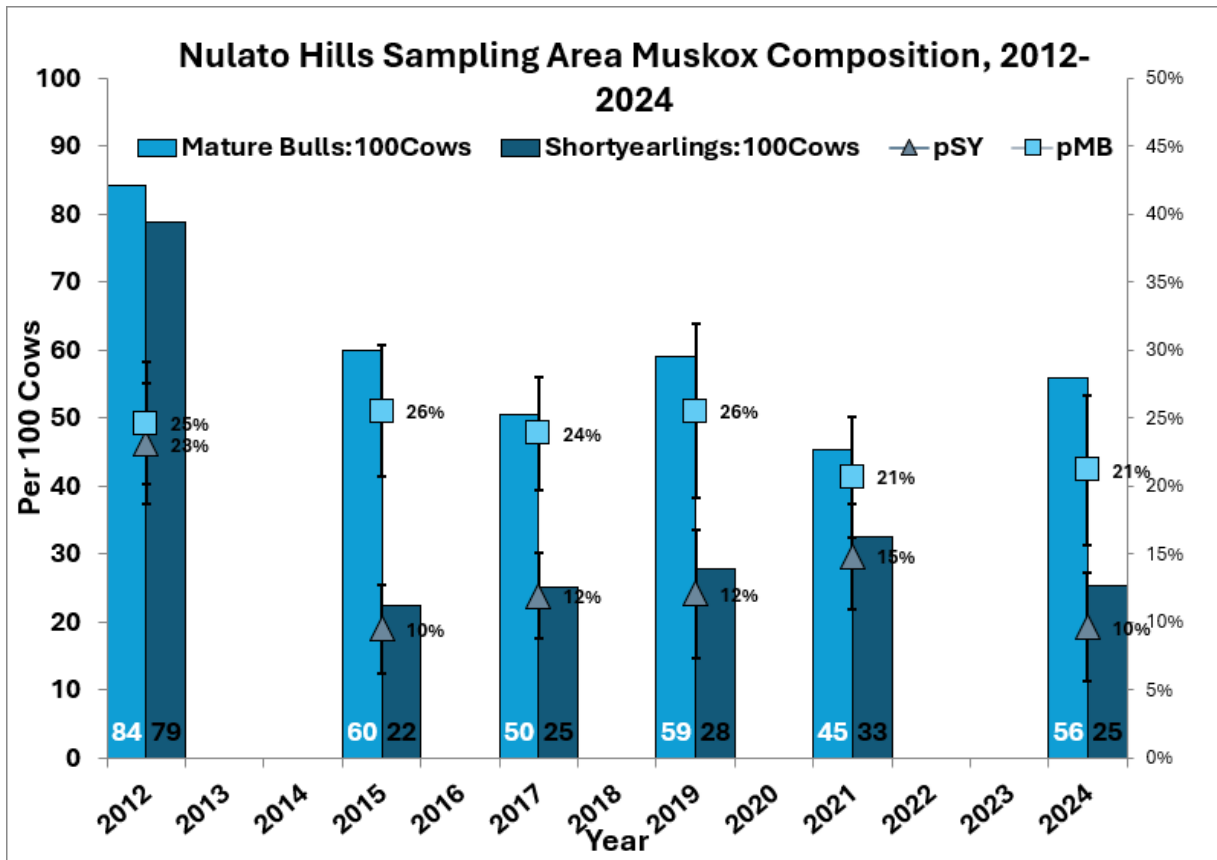


Figure 2. Population composition for expanded survey area muskox. Ratios are the number of mature bulls:100 cows and short yearlings:100 cows. Mature bulls are ≥ 4 years old. Short yearlings are muskoxen between 10 and 12 months old (ADF&G 2020).

Cultural Knowledge and Traditional Practices

Please see Proposal WP26-62a analysis.

Harvest History

Please see the Harvest History section in the Proposal WP26-64 analysis for general harvest information on the Seward Peninsula muskox population.

In 2020, ADF&G estimated the harvestable surplus in Units 22A, 21D and 24D combined to be nine bulls (ADF&G 2020). Since 2021, when the Unit 22A muskox hunt was established under State regulations, Unit 22A muskox harvest has ranged from 5–8 muskox, averaging 7 muskox per year (**Figure 3**). Since the inception of the Unit 22A Tier II hunt (TX090), there have been 8 permits available per year, all distributed to local residents (ADF&G 2021, 2022, 2023, 2024, 2025; OSM 2025).

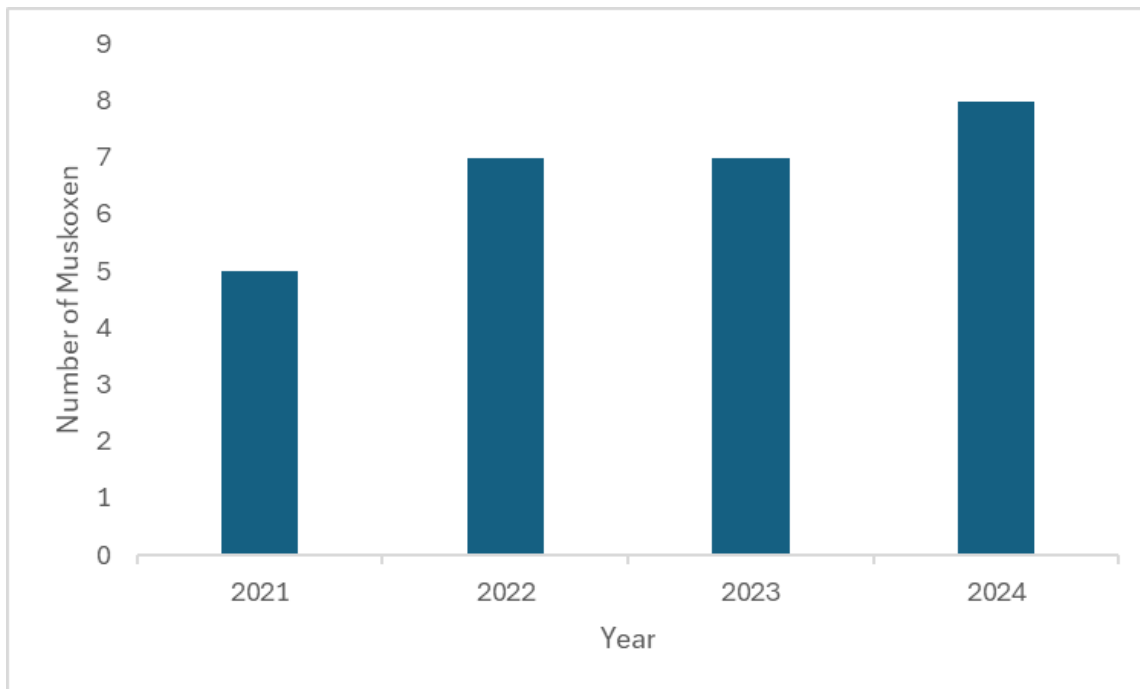


Figure 3. Reported harvest of Seward Peninsula muskox in Unit 22A (Carson 2025, pers. comm.).

Alternative(s) Considered

One alternative considered was to delegate authority to administer the Federal muskox hunt in Unit 22A to the BLM Anchorage Field Office manager, including to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits. This authority is delegated to in-season managers for the other muskox hunts in Unit 22 and delegating it for the Unit 22A muskox hunt would create flexibility and consistency in management.

Another alternative considered was to extend the muskox season in Unit 22A to March 31. Proposal WP26-64 requests extending the Seward Peninsula Federal muskox season closing date in the other Unit 22 subunits and the southwestern portion of Unit 23 SW from March 15 to March 31. This alternative would align the season dates in Unit 22A remainder with the Federal season dates for the other Seward Peninsula muskox hunts if Proposal WP26-64 is adopted. This alternative was not considered further as the Unit 22A hunt is a new hunt that would align with State regulations, if adopted as submitted. Several years of harvest is recommended to establish harvest patterns, including effort and amount of harvest before further liberalizing the season.

Discussion and Effects

Establishing a Federal season for muskoxen in Unit 22A would provide additional opportunity for federally qualified subsistence users to harvest muskoxen on Federal public lands. Currently, there is

no Federal subsistence season for muskoxen in Unit 22A, making Federal regulations more restrictive than State regulations. Additionally, federally qualified subsistence users must compete with all Alaskan residents for the limited number of State Tier II permits available in this unit.

Conservation concerns for these hunts would be mitigated by harvest quotas, and the limitation on the number of draw permits issued, which could be adjusted annually in response to the status of the muskox population. Due to the small size of the muskox population, habitat limitations and susceptibility to over hunting, this population is closely managed by the State. Since the demand for muskoxen is likely greater than the harvestable surplus, a drawing permit is recommended so that harvest is limited, and the threat of overharvest minimized. The Federal manager will need to work closely with the State to monitor harvest under both State and Federal hunts if this proposal is adopted.

Adopting this proposal would also increase alignment between State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to “ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands.”

OSM CONCLUSION

Support Proposal WP26-62b **with modification** to delegate authority to the BLM Anchorage Field Office manager to close the season, determine annual harvest quotas, the number of permits to be issued and the method of permit allocation between State and Federal permits for muskox in Unit 22A.

The draft regulations read:

Unit 22—Muskox

Unit 22A– 1 bull by Federal drawing permit or State permit

Aug. 1–Mar. 15

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, the Yukon Delta NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Justification

Establishing a Federal muskox season in Unit 22A provides additional opportunity for federally qualified subsistence users to harvest muskoxen on Federal public lands. Conservation concerns are mitigated by drawing permits and quotas limiting harvest. Currently, there is no Federal subsistence season for muskoxen in this unit, and adopting this proposal increases alignment with State regulations.

Delegating authority to an in-season Federal manager to administer the hunt is necessary for this hunt to be effectively implemented and creates consistency across Unit 22 muskox hunts.

LITERATURE CITED

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION**Seward Peninsula Subsistence Regional Advisory Council**

Support as modified by OSM. This would provide a new opportunity for federally qualified subsistence users of Unit 22A as the State permits are quite limited. The muskoxen population appears to have stabilized and remains in the area, so there is no conservation concern. Access to muskox is difficult and far from town, which will limit harvest, but the additional opportunity is welcomed.

INTERAGENCY STAFF COMMITTEE COMMENT

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Support as modified by OSM. No comments submitted.

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