

INTERAGENCY STAFF COMMITTEE RECOMMENDATION

Support Temporary Special Action request WSA19-01.

Justification

The Interagency Staff Committee concurs with the OSM staff analysis that this action will provide for increased moose hunting opportunities for Federally qualified subsistence users and reduce regulatory complexity by aligning State and Federal regulations and hunt areas. This will ease compliance, simplify enforcement, and facilitate harvest management.

Concerns were expressed during tribal consultation and public meetings about the potential for more non-locals to participate in the hunt and the requirement to obtain a State registration permit versus a Federal registration permit. The State requirement to obtain registration permits in person from Quinhagak, should reduce potential increases of non-local participation in the new hunt area, while making permits available to local users. The requirement of a State registration permit will also consolidate both Federal and State reporting requirements into a single system, further reducing regulatory complexity.

The change to add Kuskokwak and Tungak Creeks to the current Kanektok/Arolik hunt area will align all Federal and State hunt unit boundaries within Unit 18 and will reduce regulatory confusion. Changes in seasons and harvest limits associated with alignment of boundaries will improve moose harvest management and enforcement. Full rescission of the closure will provide additional opportunity to both Federally qualified and non-Federally qualified users. The additional harvest by non-Federally qualified users is anticipated to be minimal due to the localized permit distribution out of Quinhagak. Limiting distribution of permits from Quinhagak may negatively affect users from Eek by requiring them to travel to Quinhagak for permits. However, this impact is expected to be small, given that reported harvest by residents of Eek is low and that permitting locations can be expanded if necessary to accommodate local subsistence needs. During the April 2020 wildlife regulatory meeting, the Federal Subsistence Board (Board) will have a chance to consider Eek's situation further when deliberating Proposal WP20-32/33 that proposes to make this special action a permanent regulation.

Rescinding the Federal public Federal lands closure is aligned with the Boards Closure Policy. The moose population has increased significantly since the closure was established in 1991 and showed a 42 % growth rate from 2013-2018. This action is not anticipated to have a negative effect on the moose population, given the rate of growth. Furthermore, the State has allowed harvest since 2006 of one antlered bull on State lands within the hunt unit area where Federal lands are currently closed, indicating additional harvest is sustainable.

Approving this temporary special action will also allow communities to assess the new hunt structure for the 2019 season prior to the Board evaluating WP20-32/33 that could make these regulations permanent.