

## WCR26–11/12 Executive Summary

<b>General Description</b>	Wildlife Closure Review WCR26-11/12 is a standard review of Federal subsistence wildlife closures. WCR26-11 reviews a closure to moose hunting by non-federally qualified users in Unit 22B West during the fall season. WCR26-12 reviews the closure to moose hunting, except by residents of White Mountain and Golovin in Unit 22B west during the winter season.
<b>Current Regulation</b>	<p style="text-align: center;"><b>Unit 22B—Moose</b></p> <p><i>Unit 22B, west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&amp;G</i> <span style="float: right;"><i>Sep. 1-14.</i></span></p> <p><i>Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations</i></p> <p><i>Unit 22B, west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&amp;G.</i> <span style="float: right;"><i>Jan. 1-31.</i></span></p> <p><i>Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Retain the status quo</b>
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	

## WCR26–11/12 Executive Summary

<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None.</b>

## **Draft Wildlife Closure Review WCR26-11/12**

**ISSUE:** Wildlife Closure Review WCR26-11/12 is a standard review of Federal subsistence wildlife closures. WCR26-11 reviews a closure to moose hunting by non-federally qualified users in Unit 22B West during the fall season. WCR26-12 reviews the closure to moose hunting, except by residents of White Mountain and Golovin in Unit 22B west during the winter season (Please see Map 1 in the WP26-58 analysis). It is the Federal Subsistence Board's (Board) policy that Federal public lands should be reopened when closures are no longer necessary, and that closures will be reviewed at least once every four years. The purpose of this review is to determine if these closures are still warranted.

**Closure Location and Species:** Unit 22B, west of the Darby Mountains (22B West)—Moose

**Closure Dates:** Year-round.

### **Current Federal Regulations**

#### **Unit 22B—Moose**

*Unit 22B, west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G* *Sep. 1-14.*

*Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations*

*Unit 22B, west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G.* *Jan. 1-31.*

*Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations*

## Current State Regulations

### Unit 22B–Moose

*Unit 22B, remainder Residents: One bull by permit available in person in RM840 Sep. 1-14 Brevig Mission, Golovin, Nome, Teller, and White Mountain from July 25-Aug. 25. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.*

*OR*

*Residents: One antlered bull by permit available in RM843 Jan. 1-31. person in White Mountain and Golovin beginning Dec. 1. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.*

*Nonresidents No open season.*

**Regulatory Year Initiated:** 2002

**Closure last reviewed:** 2022 – WCR22-11/12

### Justification for Original Closure

Section 815(3) of ANILCA states:

*Nothing in this title shall be construed as – (3) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on public lands (other than national parks and monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law...*

Section 816(b) of ANILCA states:

*Except as specifically provided otherwise by this section, nothing in this title is intended to enlarge or diminish the authority of the Secretary to designate areas where, and established periods when, no taking of fish and wildlife shall be permitted on the public lands for reasons of public safety, administration, or to assure the continued viability of a particular fish or wildlife population.*

Federal public lands were closed by the Federal Subsistence Board (Board) through the adoption of WP02-34. This was due to conservation concerns for the declining moose population and to provide federally qualified subsistence users an opportunity to harvest the limited number of moose on Federal public lands in Units 22B, west of the Darby Mountains; 22D Kuzitrin; 22D SW; and 22E. The Board adopted Proposal WP02-34 with the Office of Subsistence Management (OSM) modification, which shortened the moose seasons in 22B West, 22D Kuzitrin, 22D SW, and 22E and changed the harvest limit to bulls only in Units 22B West, 22D SW, and 22E. The Board adopted these changes to protect the cows in the area, as calf survivability was believed to be depressing the population. This proposal also restricted the harvest in all units to federally qualified subsistence users. The Board felt closing Federal public lands to all but federally qualified subsistence users would improve subsistence harvest opportunities in an area where the State had recommended restricting moose harvest.

Proposal WP02-35, a §804 analysis adopted by the Board, restricted harvest even further to residents living within some of these units. This proposal restricted participation in the Unit 22B West winter hunt to residents of Unit 22B West. The fall Unit 22D Kuzitrin hunt was restricted to residents of Unit 22D. Both the fall and winter hunts in Unit 22D SW were restricted to residents of Unit 22D. The Board felt restricting moose harvest on Federal public lands to a subset of federally qualified subsistence users would improve subsistence opportunities for those who depend upon moose the most.

#### **Council Recommendation for Original Closure**

The Seward Peninsula Regional Advisory Council (Council) unanimously supported Proposal WP02-34, as modified by OSM. The Council believed this proposal would provide sufficient opportunity for federally qualified subsistence users while taking the most conservative approach to conserving the moose population. The Council also supported Proposal WP02-35 as modified by OSM. They felt restricting harvest to the most dependent users of the resource was a conservative measure that would still provide a subsistence priority.

#### **State Recommendation for Original Closure**

The State supported Proposal WP02-34, as modified by OSM, to shorten the moose season, set a harvest quota, require a registration permit, and restrict harvest to federally qualified subsistence users.

#### **Extent of Federal Public Lands**

Unit 22B west of the Darby Mountains is comprised of approximately 28% Federal public lands, consisting of 27% Bureau of Land Management (BLM) and 1% U.S. Fish and Wildlife Service (USFWS) managed lands.

#### **Customary and Traditional Use Determination**

Residents of Unit 22 have a customary and traditional use determination for moose in Unit 22.

## **Regulatory History**

Please see the Regulatory History section in WP26-58.

## **Current Events**

In February 2025, ADF&G closed the RM843 in Unit 22B West by Emergency Order (EO) R05-02-25 (ADF&G 2025). In January 2024, ADF&G closed the RM843 hunt by EO R5-1-24 (ADF&G 2024). This winter season was only open for 5 days total before the harvest quota was reached. In September 2023, ADF&G closed the fall RM840 hunt by EO #R5-6-23 (ADF&G 2023). This hunt was only open for 9 days out of the scheduled 14-day season. These winter hunts have been consistently closed early via EO since 2018 (ADF&G 2019, 2020, 2021, 2022).

## **Biological Background**

Please see Biological Background section in WP26-58.

## **Cultural Knowledge and Traditional Practices**

Please see Cultural Knowledge and Traditional Practices section in WP26-58.

## **Harvest History**

Please see Harvest History section in WP26-58.

## **Alternative(s) Considered**

One alternative considered was to eliminate the Federal moose permit (FM2202) for the winter hunt as it has not been utilized since 2001 as everyone has just used the State permit. Eliminating the permit would decrease regulatory complexity and administrative burden. However, this alternative is beyond the scope of a closure review. A regulatory proposal would need to be submitted to effect this change.

Another alternative considered was to eliminate the closure for the fall season. As the moose hunt is managed by quotas, conservation concerns for eliminating the closure are minimal. Since 2020 when permit restrictions were enacted, federally qualified subsistence users have harvested on average 93% of the moose in Unit 22B West, indicating eliminating the closure would not affect continuation of subsistence uses. However, the Unit 22B West moose population is still below management objectives and calf:cow ratios are very low. Additionally, quotas are quickly met and seasons typically close early, indicating demand for moose in the area far exceeds supply. Therefore, OSM did not consider this alternative further.

## **Effects and Discussion**

If these closures are rescinded, non-federally qualified users would be able to harvest moose on Federal public lands within Unit 22B, west of the Darby Mountains. Even though the Unit 22B West moose

population estimate is stable or slightly increasing, it is still below State management objectives (and the combined estimate is below combined management objectives for Units 22B and 22C) with relatively low recruitment. The bull:cow ratio is above management objectives but the calf:cow ratio is extremely low. This makes the growth potential for the herd small and limits the possibility of reaching management objectives.

While seasons continue to close early and harvest quotas are quickly met, the Unit 22B West moose population cannot withstand any increases in harvest, as evidenced by consistent emergency season closures. As it is managed and protected by harvest quotas, rescinding or modifying these closures would likely result in a zero to minimal increase in harvest. However, federally qualified subsistence users may experience increased competition and decreased harvest success if these closures are rescinded. On Federal public lands, competition with non-local users could reduce harvest opportunity for federally qualified subsistence users during the fall season. However, any increases in competition would likely be very small as federally qualified subsistence users harvest most of the moose in Unit 22B west.

During the winter season, competition with both non-federally qualified users and other federally qualified subsistence users, especially with residents of Nome, may reduce harvest opportunity for residents of White Mountain and Golovin. If the winter season were opened to all federally qualified subsistence users, residents of White Mountain and Golovin would similarly experience increased competition from Nome residents and other federally qualified subsistence users as well as reduced opportunity to harvest moose. The winter hunt is critical for these communities, which harvest all of their moose during the winter season in some years.

## **OSM PRELIMINARY CONCLUSION**

- ☒ **Retain the Status Quo**
- ☐ **Rescind the Closure**
- ☐ **Modify the Closure to** Click or tap here to enter text.
- ☐ **Defer Decision on the Closure or Take No Action**

## **Justification**

The moose population in the portion of Unit 22B west of the Darby Mountains continues to be below State management objectives and recruitment remains low. Demand for moose in the area far exceeds supply as hunts typically close early as quotas are quickly met. Therefore, Federal public lands should remain closed to non-federally qualified users for the conservation of a healthy moose population and to allow the continuation of subsistence uses of moose during the fall and winter hunts.

The winter hunt should remain open to the harvest of moose by residents of White Mountain and Golovin only. The Federal closure during the winter hunt will help ensure the continuation of subsistence uses of moose for residents of these communities due to the continued low number of animals available for harvest.

## **LITERATURE CITED**

ADF&G 2019. Emergency Order 05-06-19. Issued September 6, 2019. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>

ADF&G 2020. Emergency Order 05-08-20. Issued September 4, 2020. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>

ADF&G 2021. Emergency Order 05-06-21. Issued September 9, 2021. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>

ADF&G 2022. Emergency Order 05-04-22. Issued September 7, 2022. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>

ADF&G 2023. Emergency Order R5-6-23. Issued September 9, 2023. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>

ADF&G 2024. Emergency Order R5-1-24. Issued January 5, 2024. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>

ADF&G 2025. Emergency Order R5-2-25. Issued February 14, 2025. Alaska Department of Fish and Game. Nome, AK. <https://www.adfg.alaska.gov/index.cfm?adfg=wcnews.ordersarchive>