

## WCR26–16 Executive Summary

<b>General Description</b>	Wildlife Closure Review WCR26-16 is a standard review of a Federal subsistence wildlife closure to the harvest of moose by non-federally qualified users hunting on Federal public lands in Unit 22E.
<b>Current Regulation</b>	<p><b>Unit 22D—Moose</b></p> <p><i>Unit 22D, that portion within the Kougarok, Kuzitrin, and Pilgrim River drainages—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. Sep. 1-14</i></p> <p><i>Federal public lands are closed to the taking of moose except by residents of Units 22C and 22D hunting under these regulations</i></p> <p><i>Unit 22D, that portion west of the Tisuk River drainage and Canyon Creek— 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. Sep. 1-14</i></p> <p>OR</p> <p><i>1 bull by Federal registration permit (FM2204). 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. Dec. 1-31</i></p> <p><i>Federal public lands are closed to the taking of moose except by residents of Units 22C and 22D hunting under these regulations.</i></p> <p><i>Unit 22D, remainder - 1 bull by State registration permit. Aug. 10-Sep. 14.</i></p> <p>OR</p> <p><i>1 antlered bull by State registration permit. Season may be announced, Dec. 1-Jan. 31.</i></p> <p><i>Federal public lands are closed to the harvest of moose except by Federally qualified subsistence users</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Retain the status quo</b>
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	

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

## **Draft Wildlife Closure Review WCR26-16**

**ISSUE:** Wildlife Closure Review WCR26-16 is a standard review of a Federal subsistence wildlife closure to the harvest of moose by non-federally qualified users hunting on Federal public lands in Unit 22E. (Please see **Map 1** in WP26-61). It is the Federal Subsistence Board's (Board) policy that Federal public lands should be reopened when a closure is no longer necessary, and that closures will be reviewed at least once every four years. The purpose of this review is to determine if this closure is still warranted.

**Closure Location and Species:** Unit 22E– Moose

**Closure Dates:** Year-round.

### **Current Federal Regulations**

Please see Regulations section in WP26-61.

### **Current State Regulations**

Please see Regulations section in WP26-61.

**Regulatory Year Initiated:** 2002

**Closure last reviewed:** 2022 – WCR22-16

### **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...*

Federal public lands were closed by the 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, that portion within the Kougarok, Kuzitrin, and Pilgrim river drainages (22D Kuzitrin); 22D, that portion west of the Tisuk River drainage and Canyon Creek (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.

### **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 22E is comprised of approximately 56% Federal public lands and consists of 50% National Park Service (NPS) and 6% Bureau of Land Management (BLM) 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 Regulatory History section in WP26-61.

### **Biological Background**

Please see Biological Background section in WP26-61.

### **Cultural Knowledge and Traditional Practices**

Please see Cultural Knowledge and Traditional Practices section in WP26-61.

### **Harvest History**

Please see Harvest History section in WP26-61.

## **Alternative(s) Considered**

One alternative considered was to require a Federal registration permit for the Unit 22E moose hunt to obtain more accurate harvest data. This alternative is outside the scope of a closure review, although the Council may consider submitting a proposal to effect this change during the next call for wildlife proposals in early 2025. A similar proposal could be submitted to the BOG to request a State registration permit be required to hunt moose in Unit 22E under State regulations.

## **Effects and Discussion**

If this closure is rescinded, all users could hunt moose on Federal public lands in Unit 22E. This could increase total moose harvest within the subunit, especially from nonresident harvest, which has substantially increased since 2012, although ADF&G may adjust the number of permits available each year. Unit 22E is one of four subunits on the Seward Peninsula that requires only a harvest ticket (with no harvest quota) and no registration permit (managed by harvest quotas that are met or exceeded each year), which also limits harvest reporting. If the closure is rescinded, increased hunting pressure from State residents may cause user conflicts and increase harvest to unsustainable levels. Harvest estimates from 2017 and 2021 indicate harvest exceeded sustainable rates. Declining bull:cow ratios indicate few surplus bulls are available for harvest.

## **OSM PRELIMINARY CONCLUSION**

- ☒ **Retain the Status Quo**
- ☐ **Rescind the Closure**
- ☐ **Modify the Closure to**
- ☐ **Defer Decision on the Closure or Take No Action**

## **Justification**

The Unit 22E moose population has been above the minimum State management objective since 2011. However, in the same timeframe there has been a decline in the moose population in Unit 22D and the combined Unit 22D and 22E population estimate has trended downward since 2006. This combined 22D and 22E population estimate is well below the combined subunit population objective. More investigation into the cause of this is needed before decisions affecting harvest can be made. Additionally, the bull:cow ratio has consistently declined since 2014, and the most recent survey in 2022 yielded ratios just meeting State objectives. This decline in bulls indicates there are fewer available for harvest. If the closure is rescinded, hunting pressure from non-federally qualified users may cause user conflicts, increase harvest to unsustainable levels, and reduce subsistence opportunity for federally qualified subsistence users. Retaining the status quo balances providing subsistence opportunity with conserving the moose population, which cannot withstand any increases in harvest.