



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
National Wildlife Refuge Complex  
Koyukuk/Nowitna/Innoko  
P.O. Box 287  
Galena, AK 99741  
907-656-1231



IN REPLY REFER TO:

February 25, 2022

## MEMORANDUM

Subject: Decision on March 1-5, 2022 Antlerless Moose Hunt for GMUs 21D, B, and 24D.  
Decision on April 10-15, 2022 Antlered Moose Hunt for GMU 24D.

### Biological Status

Overall trends from the 2021 fall Trend Count Areas (TCAs) appear to be promising. All trend areas appear stable, but with lower production and recruitment again this year. With that said, adult moose numbers in the Nowitna and upper Koyukuk Refuges remain below average. Refuge biologists recommend a conservative harvest strategy for GMUs 21B, upper 21D and 24D under consideration and do not support cow or bull harvest at this time. However, the population in the lower portion of GMU 21D (Kaiyuh and Koyukuk River mouth) has stopped growing. Though numbers are still above the long-term average for cows and bulls, yearling recruitment and calf production/survival to fall are good, but not as high as they had been in years past (See attached Moose Trend Survey Summary 2021). Sightability was good or excellent most days because of high overcast and adequate snow cover, though heavy frost created a “canopy” in dense brush and forested areas.

Trend counts indicate below average but stable adult moose numbers for the upper Koyukuk and below average declining moose numbers for the Nowitna which continue to warrant a conservative approach for winter harvest of cows. GMU 21B & upper GMU 21D remain below long-term averages of adult moose but appear to be stable with lower production and recruitment this year. The overall picture in GMU24D is somewhat improved and may have stabilized. Ongoing population concern for these areas warrants a conservative harvest strategy at this time.

Biologically we support additional harvest from the lower portion of GMU 21D as does the State. Justification to not open a federal hunt is based on the Board of Game approval of the State emergency winter hunt in lower GMU 21D and land status complexity issues associated with a federal hunt.

Fall of 2021 harvest information provided from Area Biologist (AB), Glenn Stout, suggests average to slightly above average fall harvest for the communities within the areas being considered for these hunts.

### Consultation with stakeholders

**AC & RAC Comments:** Contact was made with the Chair or Vice Chair of the Koyukuk River AC, the Middle Yukon AC, and the Ruby AC in addition to the Chair of the Western Interior RAC. Representatives from these councils/committees concurred with the decision to not allow winter federal hunts due to the biological concerns within GMUs 24D, 21B, and 21D.



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**ADF&G.** ADF&G does not support opening a winter moose season for any portion of Unit 24D or 21B but is recommending an emergency hunt for this March in lower GMU 21D. AB Glenn Stout provided harvest information showing the good success of local hunters during the fall season in the GMU's under consideration.

**Other Comments:** Refuge staff presented moose trend data and addressed hunt concerns at the WIRAC meeting in mid-February. Those attending the meeting indicated that fall harvest was good and generally showed support for closing the March and April federal hunts.

### Provisional Decision

- Open all Nowitna NWR – federal lands within GMU 21B
- Open all federal lands within GMU 21D
- Open a portion of federal lands within GMU 21D
- Open all Koyukuk NWR- federal lands within GMU 24D
- Open portion of GMU 24D within Koyukuk NWR
- All areas remain closed to moose hunting for federal hunts
- Open all Koyukuk NWR – federal lands within GMU 24D to a limited quota bulls only April 10-15 unless weather/snow conditions are severe.

**Implementation:** No federal hunt authorized. The approved Board of Game proposal for the lower portion of GMU 21D (referred to as the Kaiyuh) State hunt is supported.

### Justification of decision.

The undersigned managers have reached the decision based on consultation with refuge biologists, the ADF&G area biologist, BLM biologists, Western Interior Regional Advisory Council and local advisory committees. Current population trends are encouraging but require a continued conservative harvest approach in GMUs 21D, 21B or 24D. The WIRAC, MYAC, KRAC, and RAC support the March and April closure due to biological concerns but have indicated they would like to see more opportunities afforded local residents in the future. Managers will continue to work with all stakeholders to guide future decision.

**DAVID ZABRISKIE**

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David Zabriskie  
Deputy Refuge Manager, Koyukuk Nowitna Innoko NWRs, USFWS

(Date)

**WILLIAM HEDMAN**

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Bill Hedman  
Acting Central Yukon Field Office Manager, BLM

(Date)