



November 22, 2016

An Agenda Change Request (ACR 12) has been submitted to the Alaska Board of Game requesting to change 5 AAC 85.045(16) Hunting seasons and bag limits for moose in the Kuskokwim area of Unit 18.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- (A) The Department does not believe that there is a conservation concern that would be detrimental to the sustained use of moose in this portion of Unit 18; however, it is possible that some harvest opportunity may be lost if regulations remain the same. The Kuskokwim drainage in Unit 18 has become an important population for producing high levels of moose for human consumptive use and to help meet subsistence needs.
- (B) The department is unaware of any error in regulation.
- (C) The current regulations were adopted in 2008 after a 5 year hunting closure. At that time and since then, the moose harvest has been managed as a Registration Hunt closed by EO when the quota was met. As the moose population has increased, the quota has also increased. Part of the hunt area (mostly USFWS administered Federal lands) is less accessible to boat borne hunters than the main stem of the Kuskokwim. This year Federal lands remained open for 15 days with a harvest objective of 90 moose but only 45 were harvested. State managed lands were closed after 5 days when the quota of 150 moose was anticipated to be met. At the time the proposals were due for this regulatory cycle (May 2016) it was not anticipated that the current regulations would be inadequate to allow for increased opportunity in the tributaries.

The department recommends the board accept this ACR. Moose on the Kuskokwim drainage are an important population for producing sustainable levels of moose for human consumptive use and to help meet subsistence needs. There is a positive Customary and Traditional use finding for moose in Unit 18, with an amount necessary for subsistence of 200-400 moose.

The Department and the Yukon Delta National Wildlife Refuge (YDNWR) collaborate to complete moose population surveys and administer cooperative state and federal moose hunts in this portion of Unit 18. There are two survey areas in this portion of Unit 18. The first survey area includes the main stem of the Kuskokwim River and the second survey area includes tributaries that flow into the Kuskokwim. Population surveys completed in combined survey areas during 2011 and 2015 indicate

the moose population has essentially doubled (93% increase) in this portion of Unit 18 increasing from 972 moose in 2011 to 1881 moose in 2015.

This portion of Unit 18 includes a checkerboard of state and federal lands, and current state (Sept. 1-10) and federal (Sept. 1-30) hunting season dates are inconsistent. The proposed regulatory language would create consistent September 1 – 30 hunting season dates and require state permit RM615 to hunt on either state or federal lands. New regulation would improve harvest reporting for hunt managers, and provide less confusing regulations for hunters by eliminating inconsistent season dates and confusing land status issues. The longer state season would allow for a new hunt structure in this portion of Unit 18, and create two distinct hunt areas with separate harvest quotas and easily identifiable hunt boundaries based on geographical features such as drainages, instead of current regulation that uses hard to identify federal or state managed lands based on featureless geographical markers. We anticipate increased hunting opportunity along the Kuskokwim tributaries as a result of new regulation.

The next regularly scheduled board meeting for Unit 18 is during winter/spring of 2019/2020, and the department requests consideration of this proposal prior to the next regularly scheduled meeting to provide for additional hunting opportunity in Unit 18. There are three proposals dealing with moose in Unit 18 that the board has the ability to amend to address this issue at the January meeting. In addition, the board has the ability to create a board generated proposal for the same meeting which has been publicly noticed for these regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Dale', with a stylized flourish at the end.

Bruce Dale, Director
Division of Wildlife Conservation