



MEMORANDUM

TO: Anthony Christianson, Chair
Federal Subsistence Board

DATE: January 24, 2022

PHONE: 267-2190

FROM: Ben Mulligan^{BJM}
Deputy Commissioner

SUBJECT: Temporary Special
Action WSA21-01

The Alaska Department of Fish and Game (ADF&G) has reviewed Wildlife Special Action 21-01 submitted by the Northwest Arctic Subsistence Regional Advisory Council, requesting that federal public lands in Game Management Unit (GMU) 23 and 26A be closed to non-federally qualified users (NFQU) for caribou and moose hunting for August and September 2021 and adamantly **OPPOSES** this special action request because the rationale given does not meet the requirements for such a closure under the provisions of Section 8 of the Alaska National Interest Lands Conservation Act (ANILCA) for either the conservation of healthy populations of moose and caribou or for the continuation of subsistence uses of such populations. Any approval of the proposed closure would be viewed as a violation of federal law, and we urge the Federal Subsistence Board (FSB) to follow the law and reject this proposal. If the objective is, as the requestor has stated, to regulate the use of aircraft for caribou hunting, then a more appropriate avenue would be to submit a proposal to the Alaska Board of Game as has been done in the past.

The State of Alaska is a sovereign state, which has compelling interest in the management, conservation, and regulation of all fish and wildlife and other natural resources within its jurisdiction, for sustained yield and the maximum use and benefit of the Alaskan people. Under Alaska Constitution Article 8 and AS 16.05.020, the State directly manages fish, wildlife, and habitat through ADF&G. Furthermore, State law (AS 16.05.258) ensures the state provides for subsistence use. ANILCA requires the FSB to cooperate with ADF&G, except as otherwise provided by federal law, in managing subsistence activities on public lands and protecting the continued viability of wild renewable resources in Alaska. Any action the FSB takes to unjustly close hunting opportunities for NFQUs in 23 and 26A will have a significant adverse impact on the State's ability to manage game populations, including those on federal lands within its borders. In Section 802, Congress provided that subsistence uses of fish and wildlife shall be the priority consumptive uses for rural residents only, "when it is necessary to restrict taking in order to assure continued viability of a fish or wildlife population or the continuation of subsistence uses of that population for subsistence purposes." In Section 815, Congress directed that nothing in Title 8 of ANILCA is to be construed as, "authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands...unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in Section 816 of this title, to continue subsistence uses of

such populations, or pursuant to other applicable law...” Under these provisions we see no justification for the approval of such a request under the before mentioned criteria found in ANILCA.

The closure previously established in federal regulations, along with the current controlled use areas established in state regulations, were the appropriate mechanisms to address the concerns that have been expressed in the past as well as in this special action request. These restrictions combined with harvest restrictions imposed under both state and federal hunting regulations ensure that NFQUs are spatially separated from FQUs in areas frequented by FQUs. Almost all of the NFQUs are flown in to hunting locations that are not accessible to FQUs, the large majority of whom prefer to hunt from boats. The Alaska Wildlife Troopers (AWT), the state’s peace officers charged with enforcing its fish and wildlife laws and regulations, recently informed ADF&G that they have not observed any systemic user conflicts. Reports from state law enforcement have indicated they never observe FQUs in the field more than a few hundred yards from their boat or near NFQUs who predominantly utilize aircraft to travel to their desired hunting area. The two user groups are never within proximity to one another.

With concerns from local residents stating that NFQUs are deflecting the Western Arctic caribou herd (WAH) migration by not letting the lead cows pass by before harvesting any caribou and that guides and transporters traversing the landscape by aircraft are upsetting migration, it would once again be appropriate for proposals to be submitted similar to those in the past to address these specific concerns instead of seeking a complete closure of hunting by all NFQUs in this area. From harvest records only a handful of cows are harvested by NFQUs (non-local Alaska residents) and there is no way to confirm any of these cows are the lead caribou, and even if they were with such a small number of cows being harvested it is unlikely to cause a change in migration timing. The AWT has received complaints of low-flying aircraft during the last two hunting seasons. However, none of them have been found to be tied to any actual harassment or deflection of caribou. Even when video was taken of aircraft there appeared to be no issues with the pilot’s behavior. The aircraft was flying at an adequate height (above 500 ft) and traveling in a straight line to its destination. During their near-daily patrol flights, AWT observations have been that caribou are, by and large, unresponsive to aircraft flying overhead. Occasionally they will startle and run for a few seconds until the plane passes, at which point they stop running and resume grazing. This is corroborated by a study published by Fullman et al. (2017) that found that caribou may be temporarily affected by hunters, but deflections of herd migration had not been detected.

The harvest by NFQUs of caribou in the WAH also needs to be considered. Based on previous harvest trends, it is reasonable to anticipate that NFQUs will take roughly 350 caribou, almost all bulls, out of a herd of 188,000 animals. This represents only .19 percent of the total population or just 3 percent of the estimated harvestable surplus of 11,300 caribou for the 2022-23 season, which is still on the upper end of the range of the amount reasonably necessary for subsistence (ANS) of 8,000-12,000 caribou. (Note: this ANS is for the Western Arctic and the Teshekpuk herd combined.) We also know that NFQUs are overwhelmingly harvesting bull caribou and the current bull to cow ratio found during the 2021 survey was 47:100 which is well above the minimum ratio we like to see of 30:100. Given this information, the anticipated NFQU harvest will not threaten the biological health of the herd or have an impact on the harvestable surplus.

The unintended consequences of acting on this proposed closure will be felt far and wide. If federal lands are closed to NFQUs then those Alaskans who wish to hunt this area, including many who hail from local communities, will only be able to utilize State lands or utilize those navigable waters hunting below the ordinary high-water mark where the state has jurisdiction. The vast majority of the lands in GMU 26A are either managed by the Bureau of Land Management or by the National Park Service and much of the state managed lands are located around North Slope communities. It is quite likely that closing federal lands to moose and caribou hunting will concentrate NFQUs on state managed lands near those communities or move NFQUs to adjacent GMUs where such a closure does not exist.

The economic ripples will be felt locally and throughout the state as well. Alaskans, non-residents, guides, and transporters all spend money at a variety of businesses in Alaska located both in urban and rural communities.

Background

Caribou

The Western Arctic Herd (WAH) and the Teshekpuk Herd (TCH) are the two main caribou herds found within GMUs 23 and 26A. In general, the WAH may be found within both GMUs during the proposed closure period, with the majority located in GMU 23. The TCH is primarily found in GMU 26A during this timeframe.

Western Arctic Caribou Herd

The WAH is the largest of the two herds and was estimated at 244,000 animals in 2019, down slightly from the 2017 estimate of 259,000 and up from the previous low of 201,000 (2016). The most recent estimate completed in 2021 indicates a decline to 188,000. (Figure 1). Between 2003 and 2016 the WAH experienced a period of steep population decline falling from the recorded high of 490,000. The Intensive Management (IM) population objective is 200,000 caribou and the two herds share a combined ANS of 8,000-12,000. The lack of growth and apparent recent decline is largely attributed to below average adult female survival which occurred between 2017 and 2020. The average survival for the 3-year period was 73% compared to the long-term average of 81 % (1985-2020). Short yearling recruitment and calving rates have both been at or above the long-term averages for the herd. Average short-yearling recruitment rate between 2018 and 2021 was 17:100 (short-yearlings: adults) which matches the long-term average of 17:100 since 1998. The calving rate in 2021 is 68%, which is consistent with the long-term average between 1992 and 2021. These metrics combined with the most recent population estimates seem to indicate the WAH population is declining. Skoog (1968) coined the phrase “center of habitation” to explain the range expansion and contraction that appears to be linked to increases and decreases in caribou populations. This phenomenon and the understanding that the distribution of the WAH varies considerably from season to season (Figure 2) and year to year (figure 3) has the potential to directly impact accessibility for harvest. An analysis of the oral histories and historical documentation indicate that variation in fall migration patterns and wintering areas for the WAH has occurred throughout recorded history. A publication by the Selawik National Wildlife Refuge containing oral histories about “caribou, reindeer and life as they knew it” Ruby Ayaqin Foster said of the time before caribou, “Around my time there were no caribou. We just ate fish, ptarmigan, and rabbit that is all. There were no caribou around during that time-absolutely none.” Ben Sampson the Guest Elder who spoke during the 2018 Western Arctic Herd Working Group said, “in the 1960’s in Selawik people had just started to harvest caribou. “In the 1960’s-1970’s I would go with my uncles by dog team over to the Noatak area and hunt for a couple of weeks. It took two days to get there and there were lots of good caribou.” The important thing to understand is that caribou movements are subject to change and understanding the drivers of that change is challenging.

In a recent analysis of fall migration cues which looked at the drivers of fall migration for the WAH. Cameron et al (2021) concluded that the most significant factors influencing fall movements are temperature and snow depth. Findings noted that the average fall temperatures have increased by 7.5 °F for Kotzebue over the last 50 years and the first snowfall is arriving 2-3 weeks later. With these warming conditions caribou are moving later in the year and in some cases wintering far north of wintering areas that were commonly used in the past.

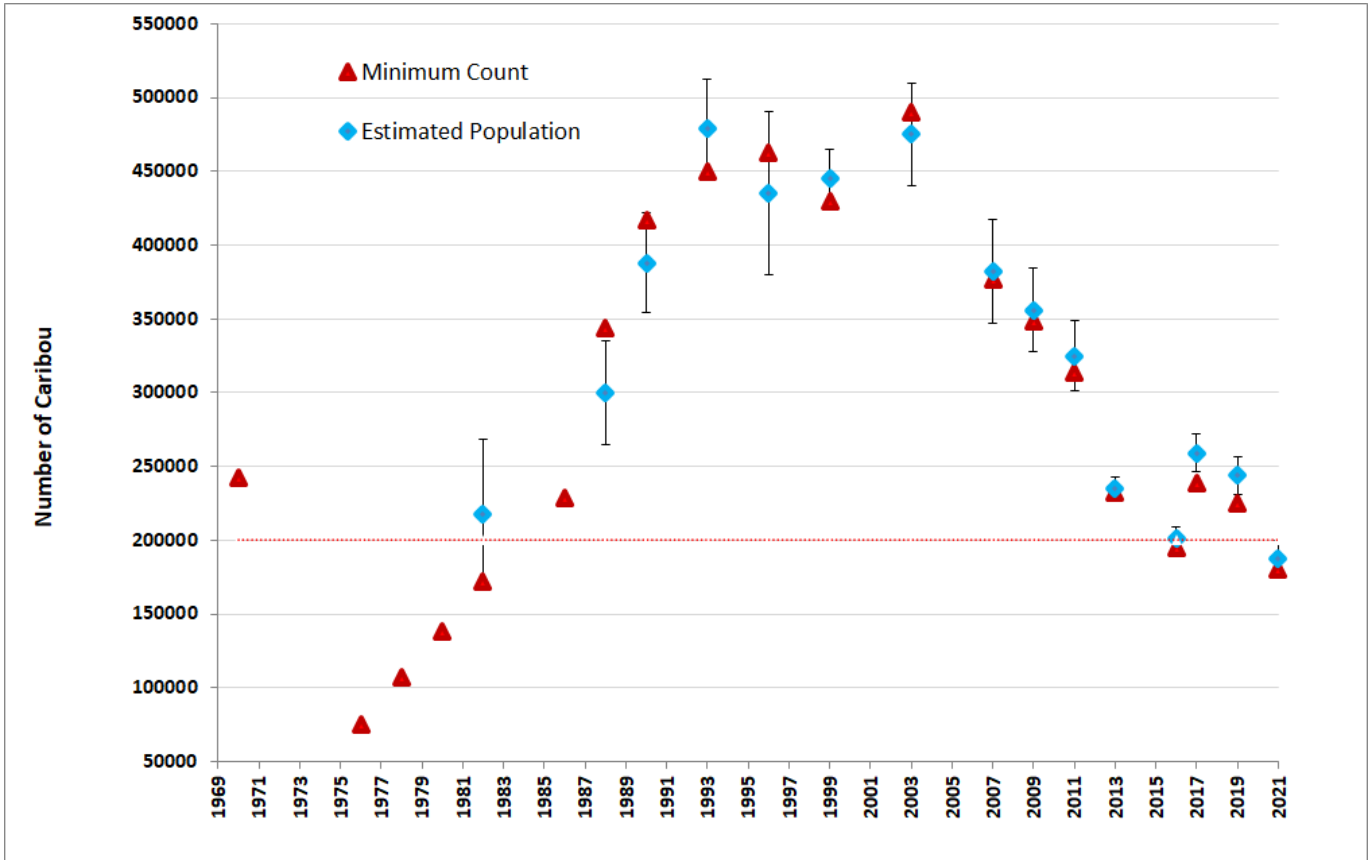


Figure 1. Population estimates and minimum counts for the WAH 1970-2021.

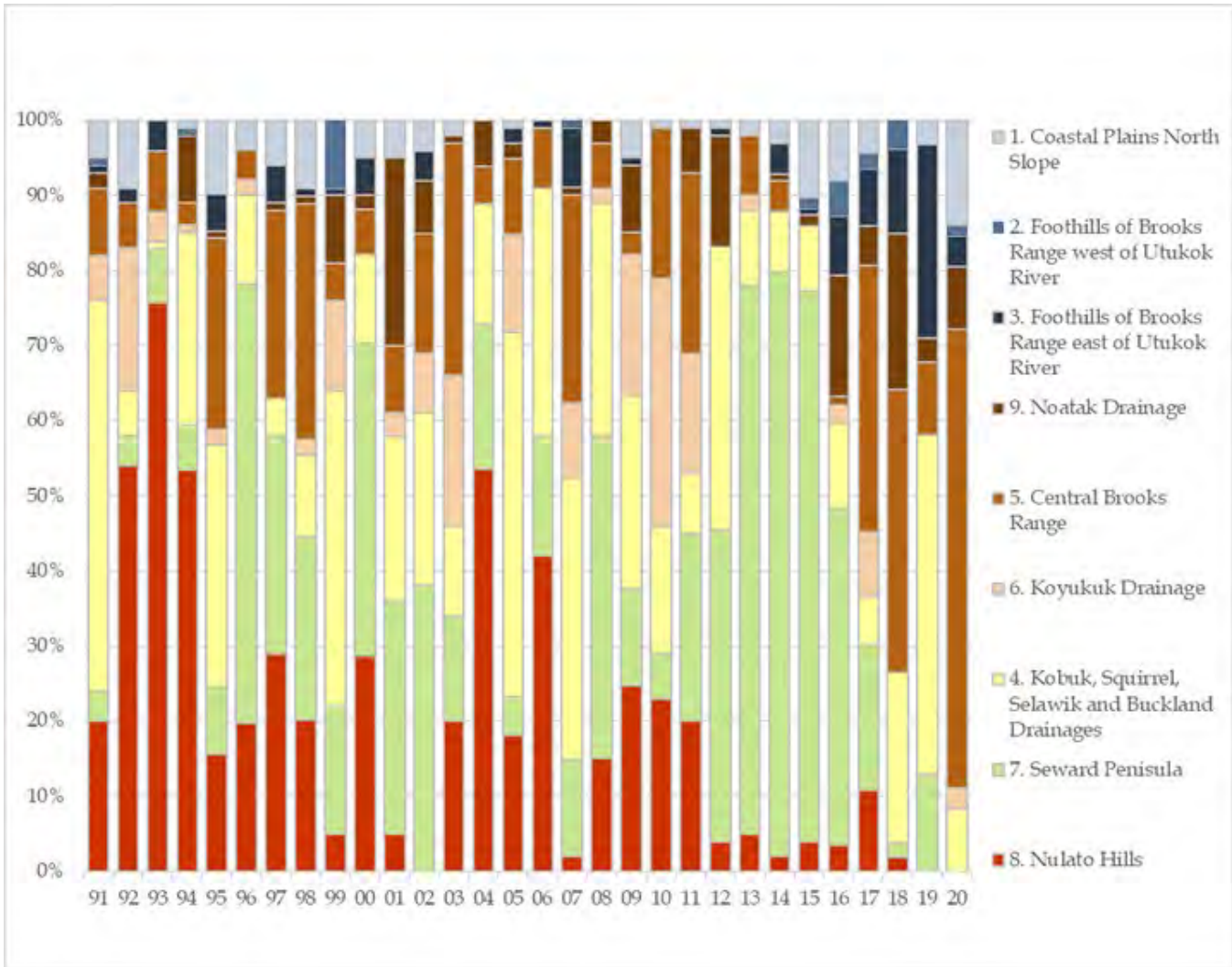


Figure 2. Annual variation in winter range occupation for the WAH by year (1992-2020)

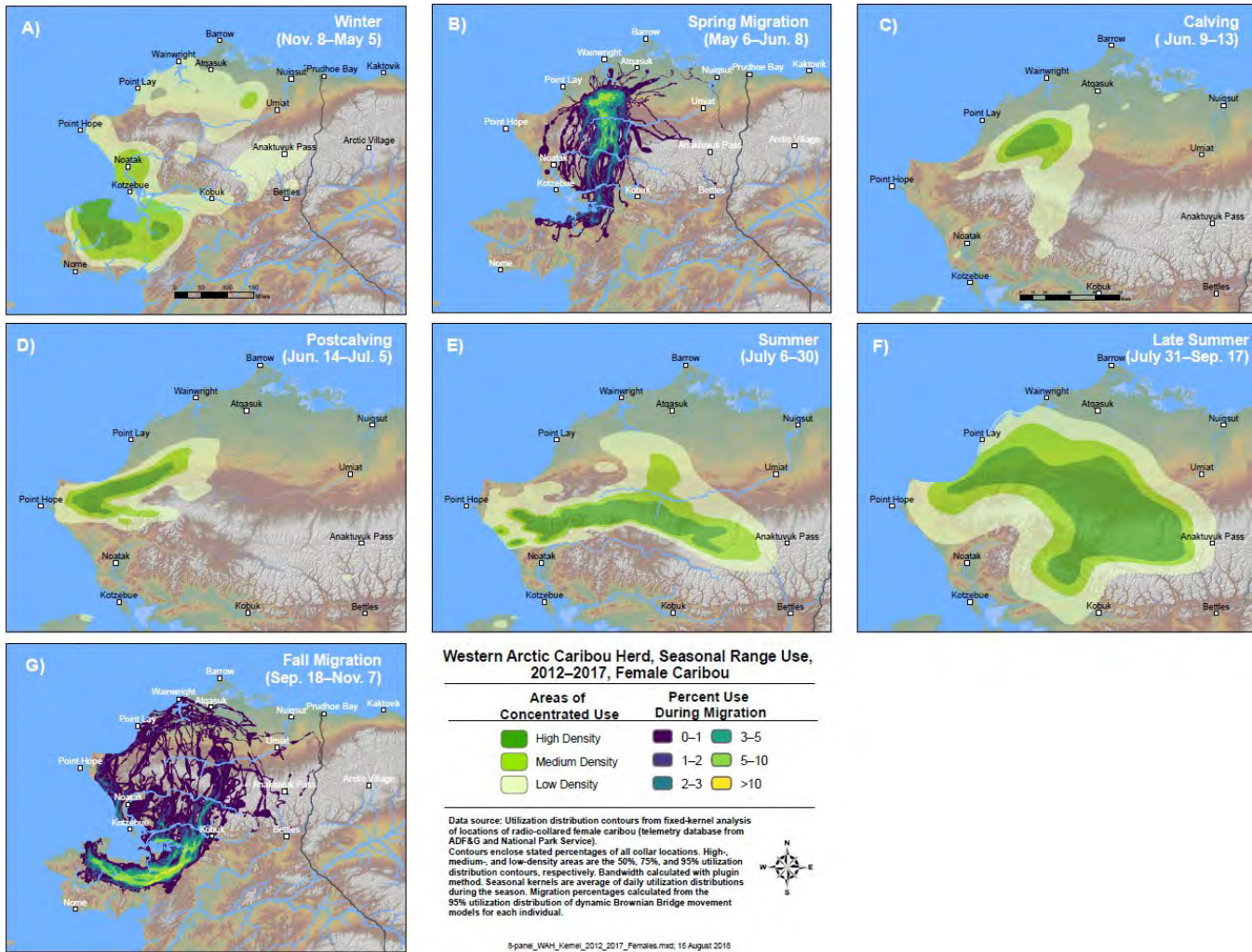


Figure 3. Seasonal distribution of WAH female caribou 2012-2017.

Teshekpuk Caribou Herd

ADF&G manages the TCH with an intensive management objective of 15,000-28,000 caribou and a harvest of 900-2,800 (Figure 3). These intensive management objectives are independent of the WAH objectives. The current TCH population estimate is 56,000 caribou and is based on the 2017 photocensus. The population is well above intensive management objectives and the amount of harvest that occurs from non-federally qualified subsistence users is minimal compared to harvest by local residents.

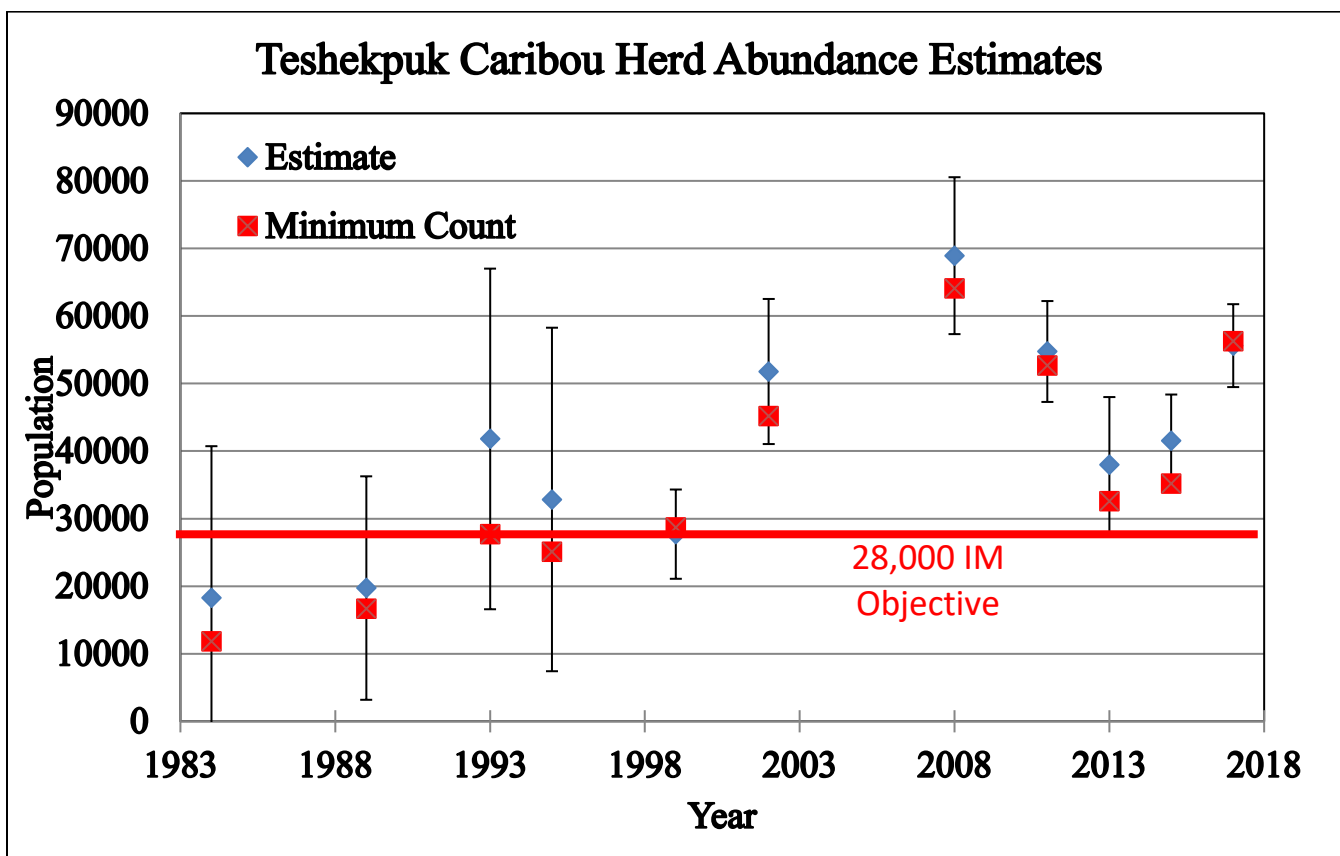


Figure 3. Teshekpuk caribou herd abundance estimates and minimum counts 1984-2017.

Caribou distribution in general is variable seasonally and annually. It is common for the TCH to overwinter on the North Slope with some portion of the herd migrating towards Anaktuvuk Pass in the fall or early winter (Figure 4). During the 2021 spring short-yearling recruitment survey 31 collars were located and a corresponding 3,073 caribou were surveyed. There were 447 calves and 2,596 adults observed, resulting in an estimated 15% recruitment rate. This recruitment rate is within the long-term range of recruitment observed from 1990-2020. The most recent fall composition survey was conducted in 2016 with 28 bulls:100 cows (low) and 48 calves:100 cows (high). During the summer 2021 parturition survey, 78 females ages 3 and older were observed and 41 were parturient. A total of 28 (36%) live calves were observed at heel. The 78 parturient caribou observed results in an estimated parturition rate of 52%, which is well below the average of 68% (2010-2020). Adult female mortality from 2020-2021 was ~10%, which is 5% lower than 15% for the 27-year average (1990-2017).

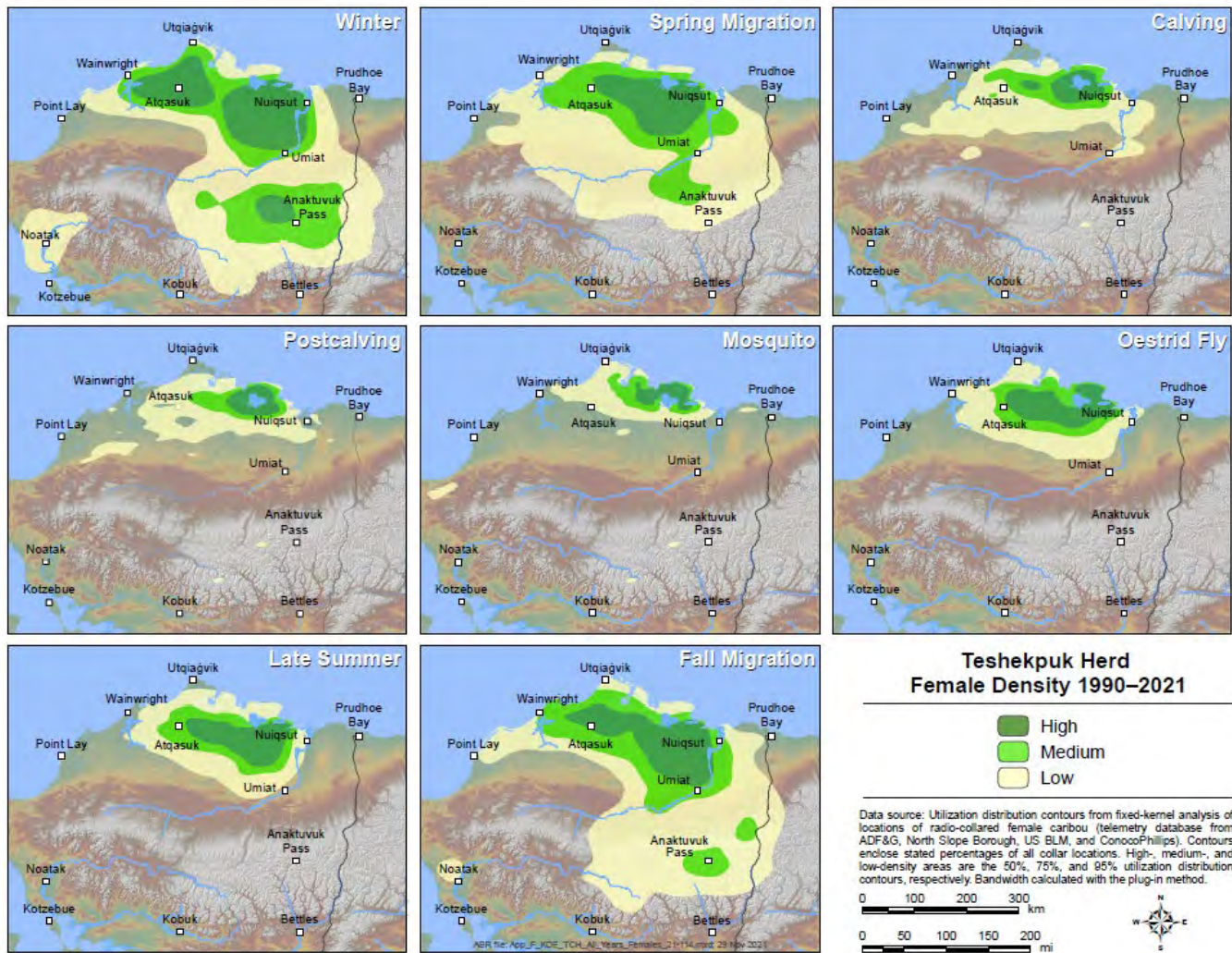


Figure 4. Seasonal distribution of female TCH 2012-2021.

Moose

GMU 23

Moose began appearing within GMU 23 in the mid-20th century as their range expanded eastward from the interior of the state. The region saw a continued increase in moose populations through the late 1980s; however, a series of severe winters and heavy spring flooding through the early 1990s resulted in high adult mortality and diminished calf recruitment. Higher predator densities and an increase in moose harvest, due to low numbers of over-wintering caribou, likely compounded these weather effects and the GMU’s moose population began to stabilize, then decline. Moose densities throughout the region remained low.

Through the late 1990s and early 2000s all moose harvest in GMU 23 was conducted under the state’s general moose harvest ticket. In 2000 a positive C&T finding was determined for moose within the GMU and in 2002 an ANS of 325-400 moose was established with a population objective of 3,500-9,000. It should be noted that the ANS finding for moose was determined at a time when caribou were generally available to most communities at least some point of the year; changing caribou migrations and distributions may influence moose harvest if local residents are unable to acquire locally preferred caribou.

At the 2003 Board of Game (BOG) meeting, a resident registration hunt (RM880) and a series of non-resident draw hunts (DM871-877) were established for GMU 23 moose. The implementation of these hunts, and changes in season dates, were intended to reduce and distribute moose harvest within the GMU, as well as address user conflicts that had arisen in the area. In Regulatory Year (RY) 04 the registration permit was introduced, while the non-resident draw permits were initiated in RY05 with permit limits set at the mean number of non-resident moose harvested between RY00-RY04. This hunt structure, with various season changes, persisted through RY16 at which point biologists determined that continued population declines warranted a reduction in harvest and a move to bull-only harvest. In January of 2017, the board adopted an amended proposal to change the RM880 permit to one antlered bull, and state biologists closed the non-resident draw hunts.

For the 2021 regulatory year, both the RM880 registration hunt and the general harvest ticket may be used to harvest moose within GMU 23. The RM880 permit allows for the harvest of one antlered bull between July 1- December 31 in GMU 23 north of, and including, the Singoalik River drainage, and between August 1- December 31 in the remainder of GMU 23. RM880 permits are only available for pickup in person from license vendors in GMU 23 communities from June 1-July 15. Alternatively, residents may harvest one bull with 50-inch antlers or with 4 or more brow tines on at least one side, under the State's general harvest ticket between September 1-September 20. Currently, Alaskan residents wishing to hunt on federal land must possess either an RM880 or a general harvest ticket. Moose hunting on Cape Krusenstern National Monument and Kobuk Valley National Park is limited to residents of GMU 23 and must be conducted under the federal subsistence regulations. Federal subsistence seasons are from August 1-December 31 and allow for the take of one antlered bull.

GMU 26A

The 2021 minimum count identified 438 moose with 20% short yearlings on the Colville moose population. The Colville moose population is currently on the lower end of their population range (Figure 5). Moose are sparsely distributed throughout the Colville River and its tributaries with a few on outlying rivers (Figure 6). The densest portions of the population are on the Anaktuvuk, Colville and Chandler rivers (Figure 6).

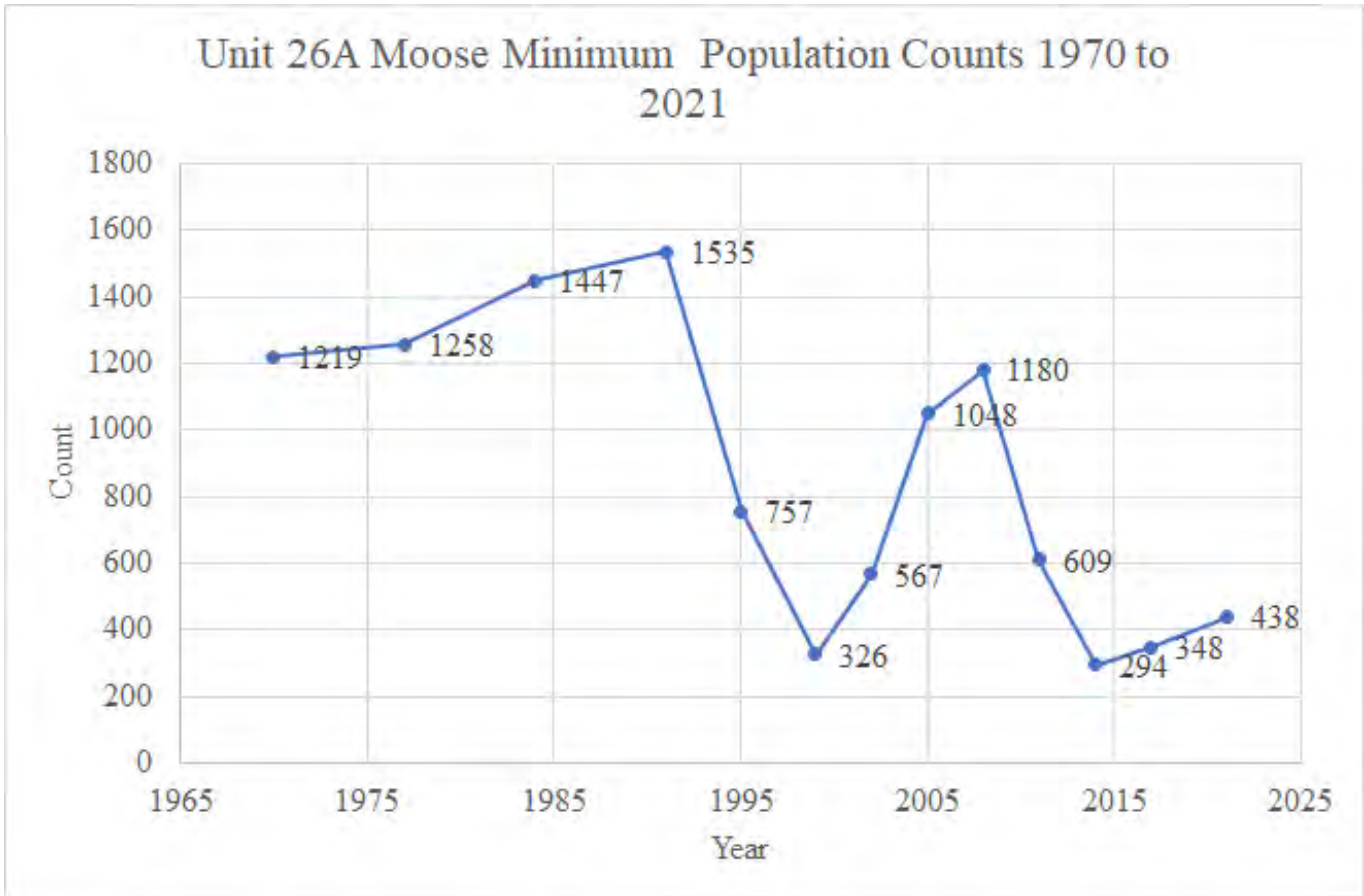


Figure 5. Colville moose minimum count survey data 1970-2021.

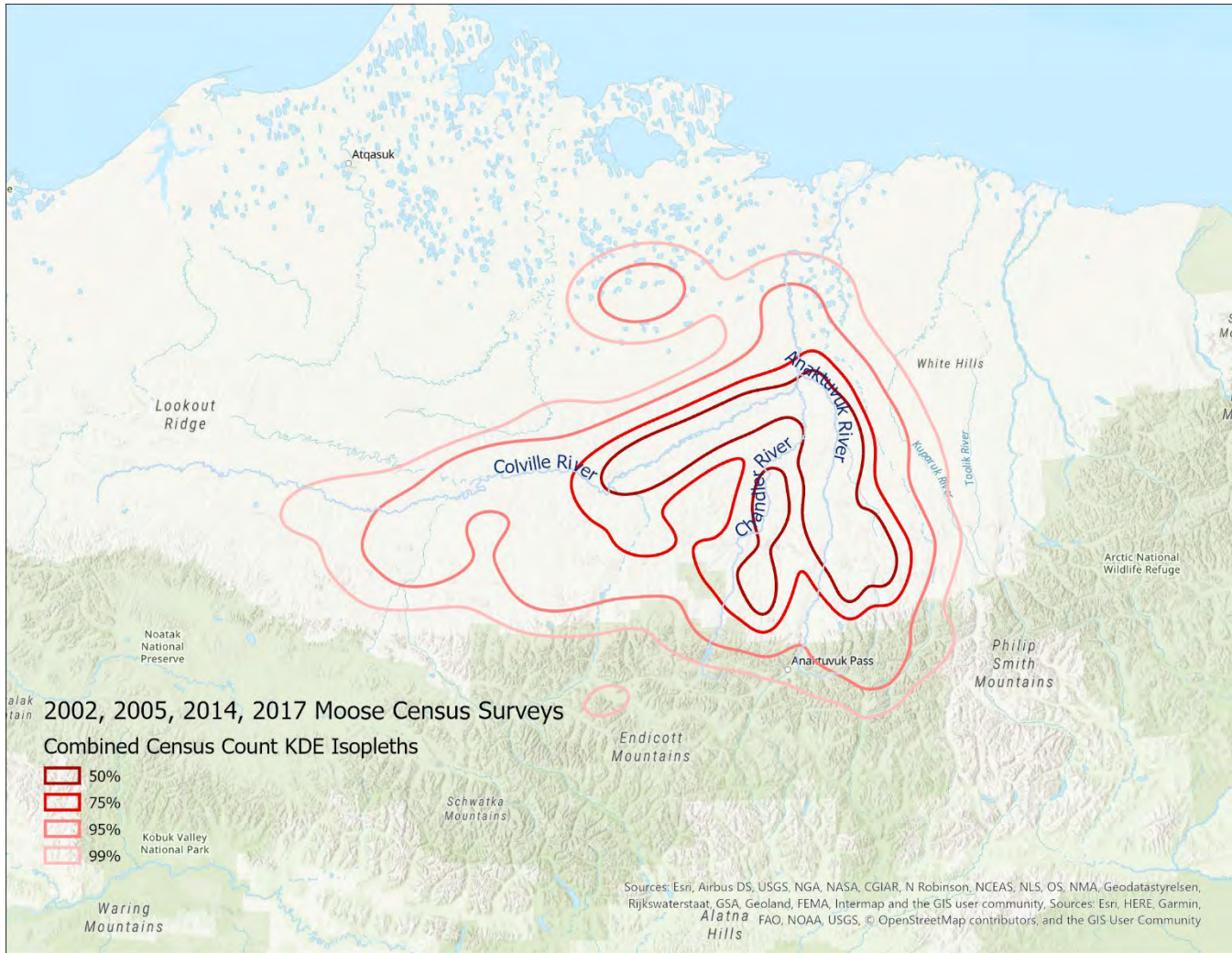


Figure 6. Combined moose census (minimum count) surveys 2002, 2005, 2014, and 2017. Darker red areas indicate denser moose distribution and lighter pink areas indicate lower densities of moose on the outer edges of their range.

Historical Regulatory Actions

Caribou

Conflict between local and non-local users of the WAH has been a topic of considerable discussion in GMU 23 since at least the early 1980s. Increasingly later fall caribou movements have contributed to escalated concerns throughout the region. These changes in movement patterns have reduced the reliability of caribou as a source of meat for GMU 23 residents who were previously accustomed to predictable fall time hunting patterns along the Kobuk River. GMU 23 residents frequently reported that airplane hunting activities in the upper Noatak are responsible for the lack of caribou migrating southward and actions stemming from these concerns have led to a suite of both state and federal regulations.

Beginning in 1985 local councils appealed to the regulatory process for relief from competition with aircraft supported caribou hunters. The first measure was granted in 1988 in response to a proposal from the Kotzebue Fish and Game Advisory Committee to the BoG which created the Noatak CUA. The new CUA closed a corridor of the Noatak River (5 miles on either side, between the Kugururok River and Sapun Creek) to the use of aircraft in any manner, for big game hunting between August 20 and September 20. Spatial and temporal adjustments to the CUA have taken place in the intervening years, with the current regulations closing the corridor extending five miles on either side of, and including, the

Noatak River beginning at the Agashashok River, and extending upstream to the mouth of the Nimiuktuk River (Figure 7). The area is closed from August 15 – September 30 to the use of aircraft in any manner for big game hunting, including transportation of big game hunters, their hunting gear, and/or parts of big game.

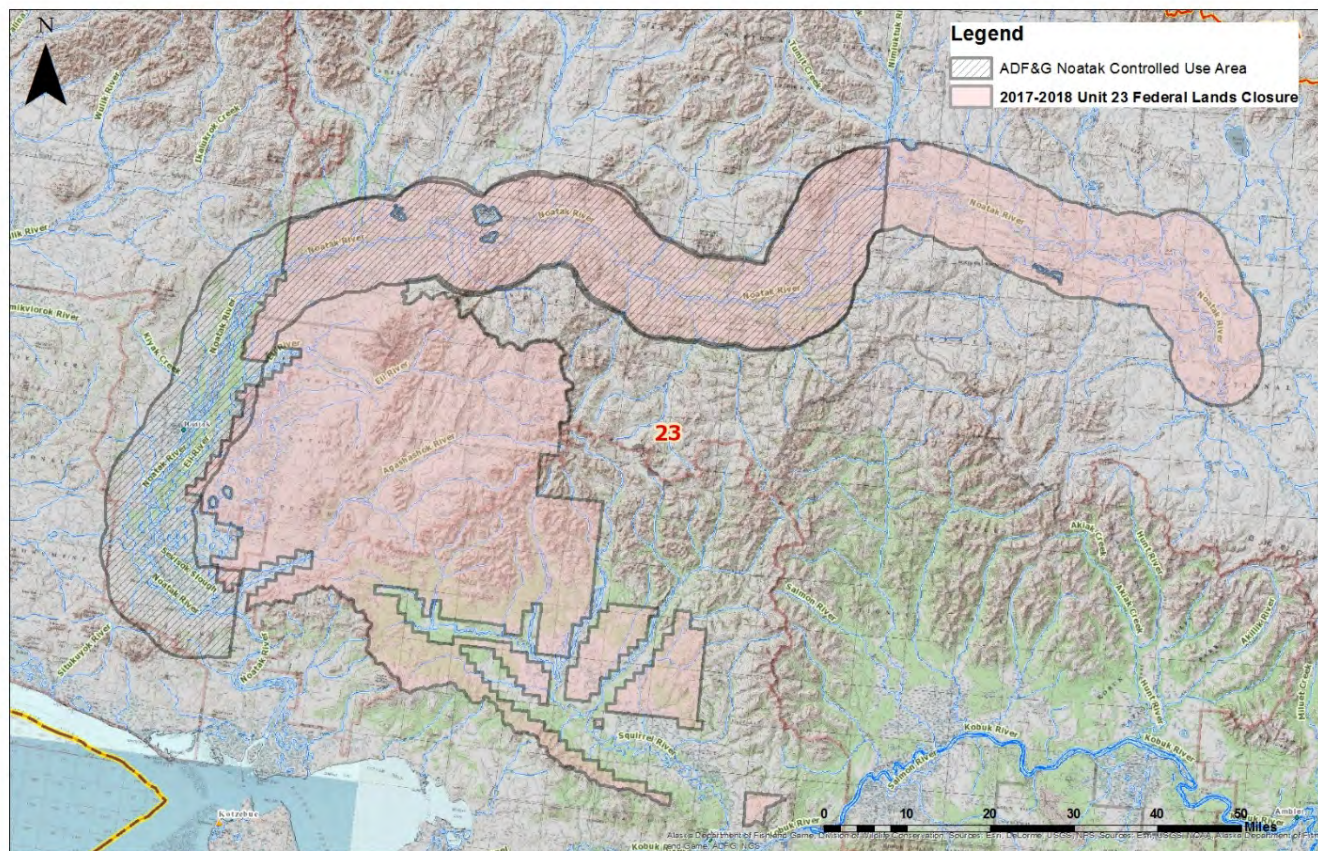


Figure 7. Fall caribou hunting restrictions, ADF&G Noatak CUA and Federal lands closed to NFQUs (red), closed areas along the Noatak River include a 5-mile buffer on either side of the river.

Perhaps the most notable regulatory event that has taken place in recent years (WSA 16-01) was approved by the FSB in 2016, and which closed all federal lands to NFQUs for the purpose of caribou hunting in the fall of 2016. This decision was in response to a request from the Northwest Arctic Regional Subsistence Advisory Council (NWARAC) and was followed up by an identical special action request (WSA17-03) the following year. WSA17-03 was amended from its original extent and became a targeted closure which effectively extended the Noatak CUA to the Cutler River and added those federal lands within the Squirrel River drainage (Figure 7). In 2018, WP18-46 established the permanent closure, but caribou movements have continued to frustrate local users who invest time and financial resources in travel to previously fruitful areas to wait on caribou that may or may not arrive.

The controlled use area for GMU 26A was established in RY06-07 and concerned the lands surrounding Anaktuvuk Pass. This area is closed from August 15 - October 15 to the use of aircraft for caribou hunting, including the transportation of caribou hunters, their hunting gear, and/or parts of caribou. However, this does not apply to the transportation of caribou hunters, their gear, or caribou parts by aircraft between publicly owned airports in the controlled use area.

Management Strategies

Caribou**Unit 23—Caribou**

23, north of and including Singoalik River drainage	Residents—Five caribou per day by permit available online at http://hunt.alaska.gov or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.	Bulls	RC907	No closed season
	Nonresidents—One bull		HT	Aug. 1-Sept. 30
23 remainder	Residents— Five caribou per day by permit available online at http://hunt.alaska.gov or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.	Bulls	RC907	No closed season
	Nonresidents—One bull		HT	Aug. 1-Sept. 30
		Cows	RC907	Jul. 15-Apr. 30
				Sept. 1-Mar. 31

Unit 26A—Caribou

26A, the Colville River drainage upstream from the Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and including the Utukok River drainage	Residents—Five caribou per day by permit available online at http://hunt.alaska.gov or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.	Bulls	RC907	July 1-Oct. 14 Feb. 1-June 30
	Nonresidents—One bull		HT	July 15-Sept. 30
26A remainder	Residents—Five bulls per day by permit available online at http://hunt.alaska.gov or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.		RC907	July 1-July 15 Mar. 16-Jun 30
	Residents—Five caribou per day, three of which may be cows; cows with calves may not be taken. Permits available online at http://hunt.alaska.gov or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.		RC907	July 16-Oct. 15

Residents—Three cows per day by permit available online at <http://hunt.alaska.gov> or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.

RC907

Oct. 16-Dec. 31

Residents—Five caribou per day, three of which may be cows. Permits available online at <http://hunt.alaska.gov> or in person in Kotzebue, Utqiagvik, and at license vendors in Units 23 and 26A beginning June 22.

RC907

Jan. 1-Mar. 15

Nonresidents—One bull

HT

July 15-Sept. 30

Annual harvest has been estimated at approximately 12,000 for the WAH and 3,500 for the TCH using household harvest survey data (ADF&G Subsistence Division); survey results include caribou location data expressed as “availability.” Our best understanding of caribou harvest for both herds indicates that harvest has exceeded the combined WAH/TCH ANS of 8-12,000 for at least the past 25 years.

However, harvest estimates acquired through this approach are unable to capture short-term variations in harvest and that the actual WAH harvest might be lower since at least 2018 due to a lack of availability.

A better understanding of resident harvest is imperative if we are to understand short term changes and potential implications. As an attempt to address this data gap the RC907 caribou registration permit was adopted by the BOG in 2017 as a tool to understand caribou harvest in a timelier manner. The

Department has undergone extensive efforts since that time to institute the permit and has experienced mixed success. Conservative estimates indicate that reported harvest on the RC907 permit in GMU 23 is approximately 10% of actual harvest and ADF&G continues to make efforts to improve that reporting rate.

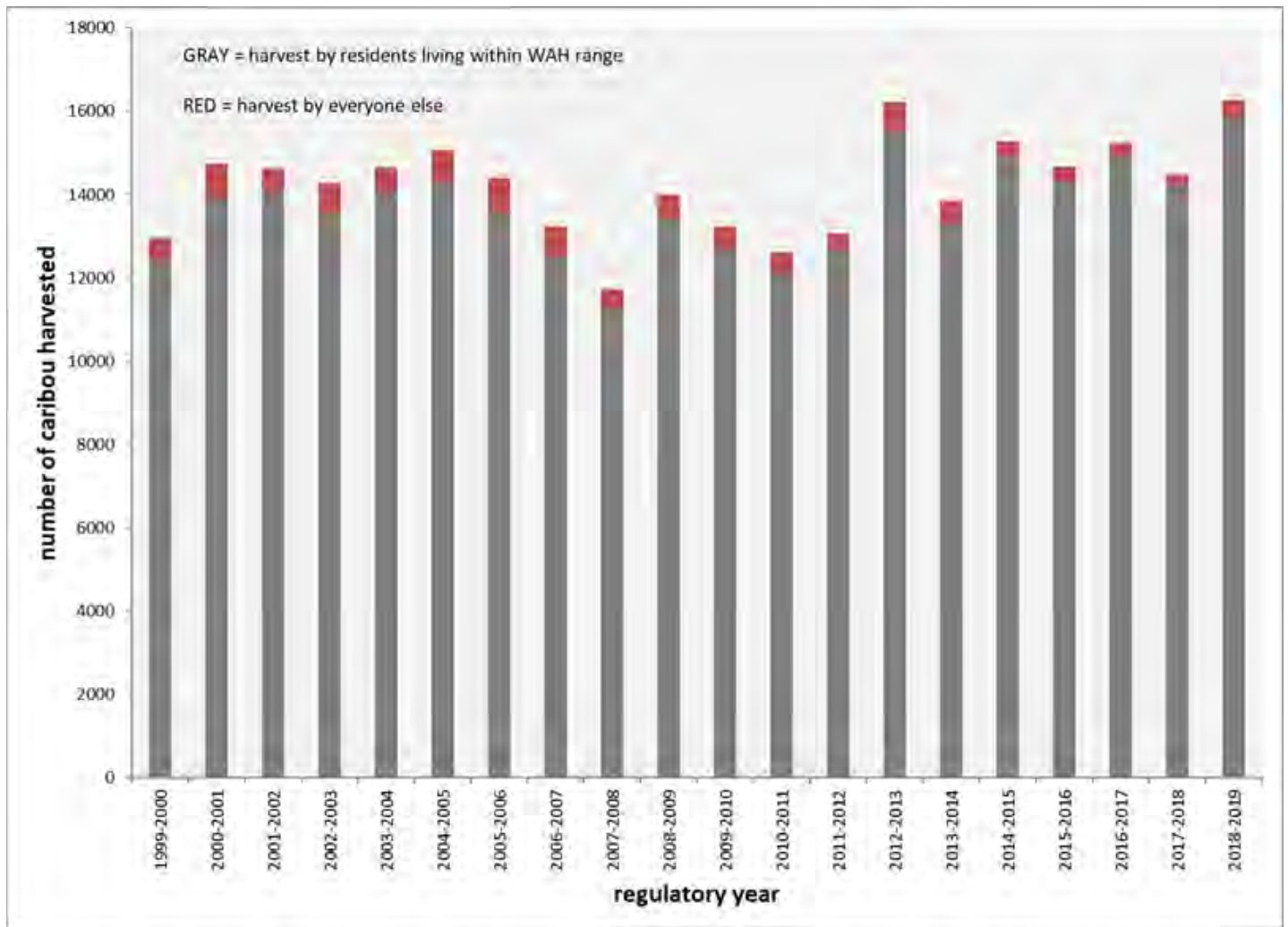


Figure 8. Historical harvest of WAH by those living within its range and everyone else.

According to the RC907 permit returns, in the WAH, NFQU (Alaska residents) harvested 80 in 2018, 56 in 2019, and 26 in 2020 for an average of 64/year. Non-residents harvested 121 in 2017, 219 in 2018, and 297 in 2019 for an average of 212/year.

Harvest data from RC907 permit returns for GMU 26A indicate harvest by Alaska resident NFQUs totaled 0 caribou in 2017, 31 caribou in 2018, and 8 caribou in 2019 for an average harvest of 13 per year over the last three years. Non-resident harvest on RC907 permit returns ranged from 10-40 caribou per year. Combined average harvest for NFQUs for both herds between 2017 and 2019 was between 300 and 350 caribou, which equates to approximately 2.5% of total harvest.

Moose

GMU 23

GMU 23 is divided into six population survey areas: Upper Noatak, Lower Noatak, Upper Kobuk, Lower Kobuk, Selawik, and Northern Seward Peninsula. A single area is surveyed each year, on rotation, which results in a GMU-wide moose abundance estimate that spans multiple years (Table 1). The current population estimate for GMU 23 is 5,600 moose (2010-2019) and represents an extrapolated estimate that accounts for unsurveyed land. Moose densities within the GMU range from 0.03-0.22 adults/mi² and spring recruitment ranges from 12-23% short yearlings. The GMU 23 moose population is managed at a 6% harvest rate, with a harvest objective of 210-920 moose with a harvestable surplus of

334 moose. The overall 5-year average reported harvest is 116 moose (2016-2020). FQU have accounted for 69-86% of harvest between 2016 and 2020 (Figure 8) with NFQU accounting for 14-31% over the same period. Residency of RM880 permit holders has seen a gradual shift over the last 5 years, with an increasing number of permits issued to FQU residents and a decreasing number to NFQU residents (figures 9 and 10). Participation under the general harvest ticket hunt has decreased overall from 69 hunters in RY16 to 31 in RY20 (Figure 12).

Table 1. Unit 23 spring geospatial moose survey results, 2009-2021 (surveys conducted cooperatively by ADFG, NPS, USFWS and BLM).

Area	Year	Size (mi ²)	Survey estimate (Nr.)				Density (Nr. /mi ²)		Calves: 100 Adults
			Adults	Calves	Total ^a	90% CI ^b	Adult	Total	
Selawik	2011	6559	1569	170	1739	±18	0.24	0.27	11
Selawik	2016	6559	826	114	940	±12	.13	.14	14
Selawik	2021	6559	942	93	1036	±16	0.14	0.16	10
Lower Noatak	2013	6404.5	1349	143	1,478	±19	0.21	0.23	11
Lower Noatak	2018	6404.5	759	101	866	±11	0.12	0.14	13
Upper Noatak	2010	4485.6	136	16	152	±18	0.03	0.03	12
N. Seward Peninsula	2009	5773.2	904	74	966	±27	0.16	0.17	8
N. Seward Peninsula	2015	5773.2	540	80	617	±14	0.09	0.11	15
Upper Kobuk	2014	5056.8	680	49	727	±24	0.13	0.14	7
Upper Kobuk	2019	5056.8	265	63	601	±16	0.05	0.12	23
Lower Kobuk- Squirrel	2012	5338	2363	181	2546	±17	0.44	0.48	8
Lower Kobuk- Squirrel	2017	5338	1175	176	1346	±16	0.22	0.25	15

^aGenerated as Total Moose in the geospatial model and therefore, does not usually equal the sum of adults and calves.

^bExpressed as a percentage of the estimate.

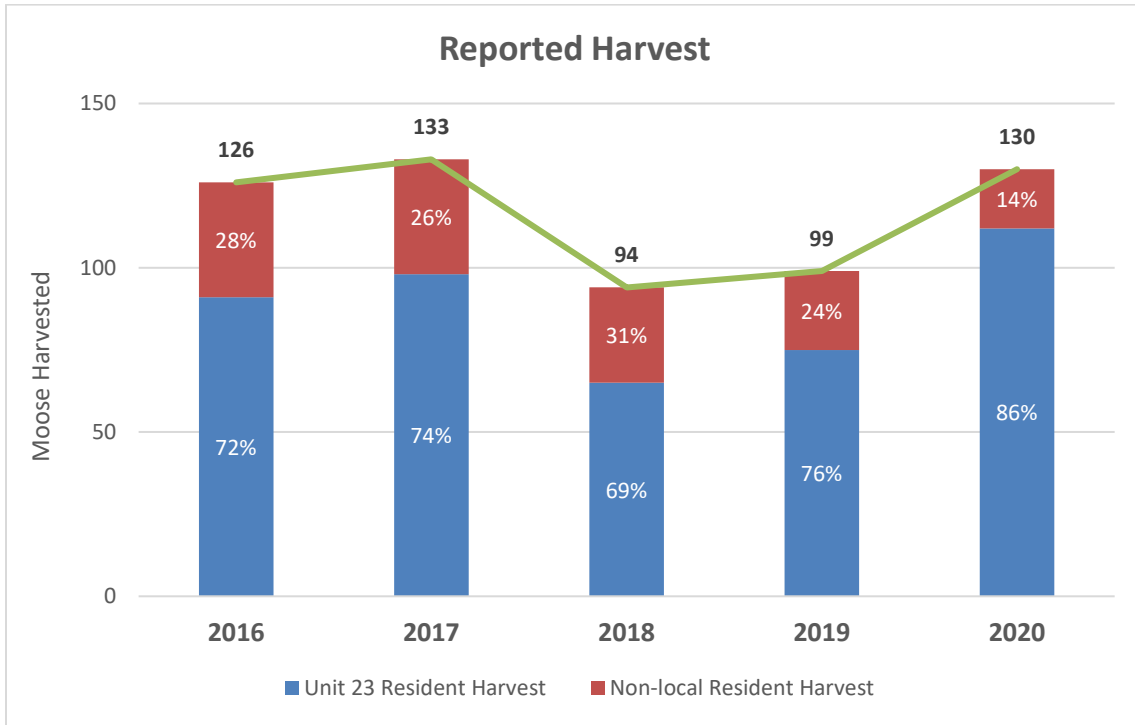


Figure 8. GMU 23 reported moose harvest, 2016-2020.

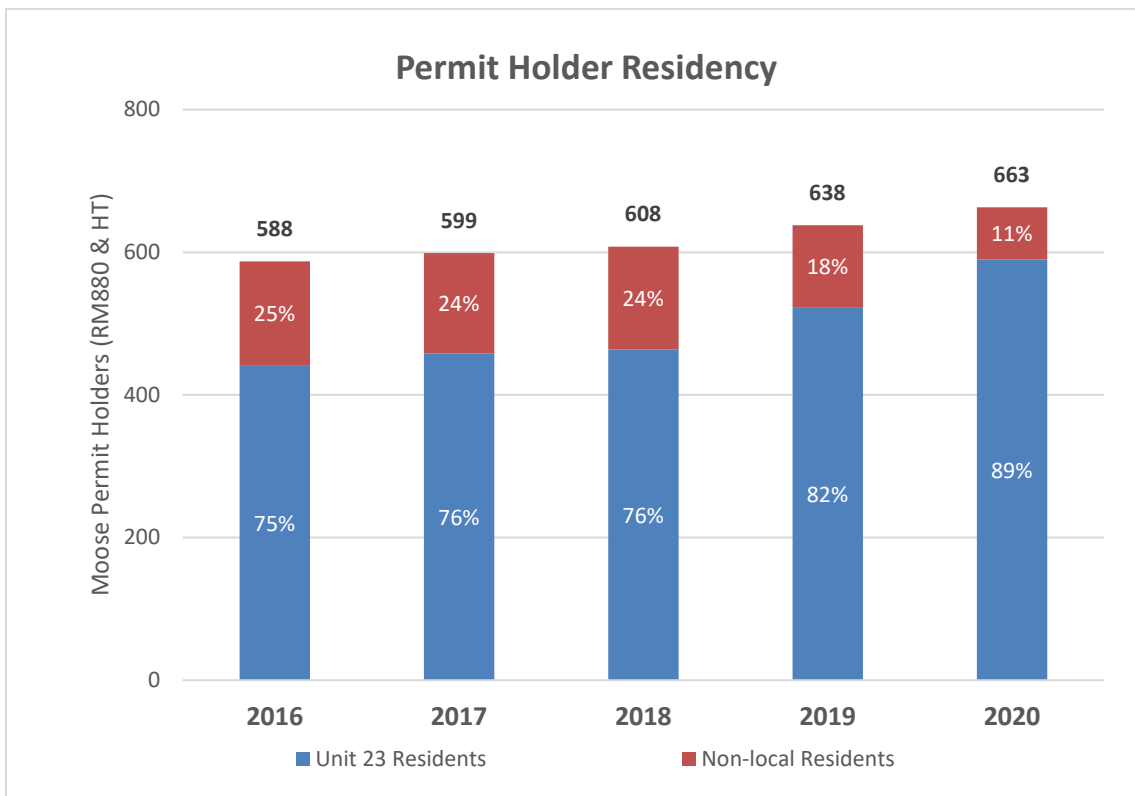


Figure 9. GMU 23 RM880 and general harvest ticket permit holder residency, 2016-2020.

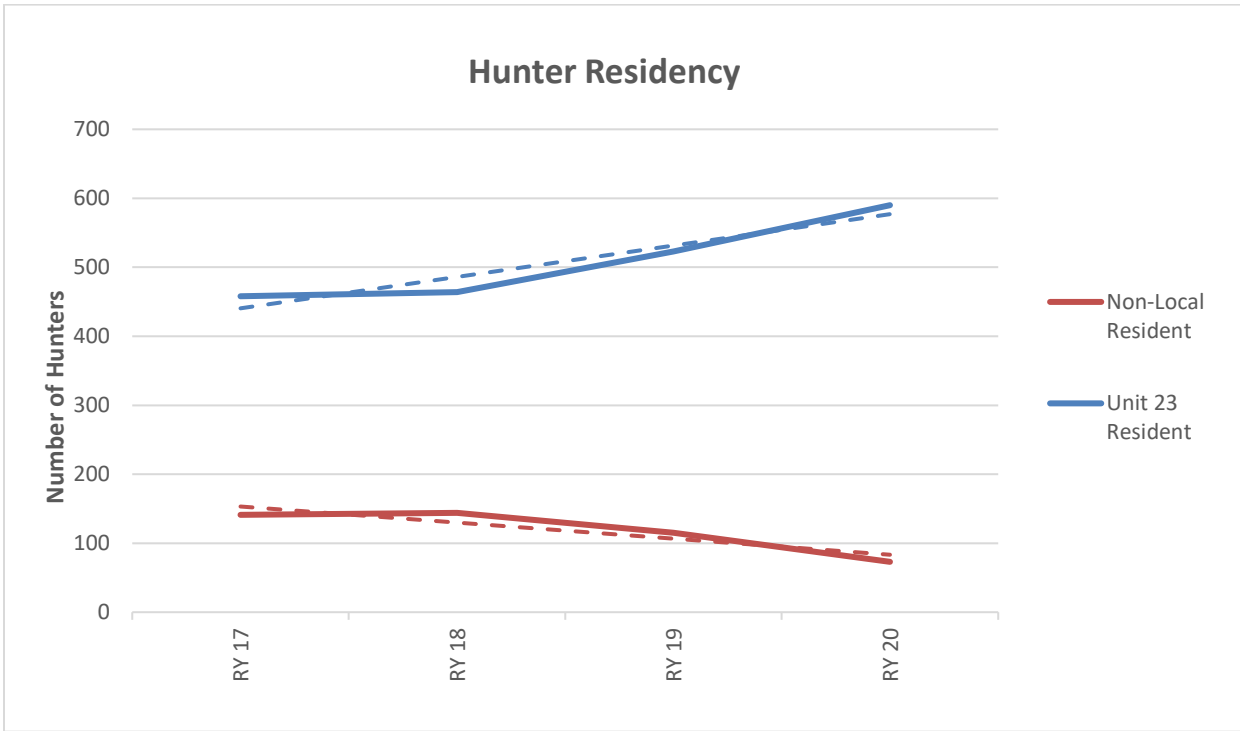


Figure 10. GMU 23 RM880 and general harvest ticket permit holder residency, RY17-20.

Table 2. GMU23 RM880 and general harvest ticket (GM000) permit and harvest statistics, 2016-2020.

	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
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RM880					
Total Permits Issued	519	509	543	585	632
<i>U23 Resident</i>	413	424	449	511	586
<i>U23 Resident Harvest</i>	81	89	62	73	111
<i>U23 Resident Unreported</i>	2	36	135	14	0
<i>Non-local AK Residents</i>	105	85	94	74	46
<i>Non-local Harvest</i>	21	19	23	13	11
<i>Non-local Unreported</i>	0	2	2	0	0
GM000					
<i>U23 Resident</i>	29	34	15	12	4
<i>Resident Harvest</i>	10	9	3	2	1
<i>Non-local AK Residents</i>	40	56	50	41	27
<i>Non-local Harvest</i>	14	16	6	11	7
Total Permit holders: RM880 and GM000	588	599	608	638	663
GMU 23 Resident Permit Holders	442	458	464	523	590
Percentage GMU 23 Resident	75%	76%	76%	82%	89%
Non-local AK Resident Permit Holders	145	141	144	115	73
Percent Non-local Resident	25%	24%	24%	18%	11%
Reported Harvest	126	133	94	99	130
U23 Resident Reported Harvest	91	98	65	75	112
Percentage U23 Resident Reported Harvest	72%	74%	69%	76%	86%
Non-local AK Resident Reported Harvest	35	35	29	24	18
Percentage Non-local AK Resident Reported Harvest	28%	26%	31%	24%	14%

GMU 26A

The ANS for the GMU 26A (Colville) moose population is 15-30 moose. There is no intensive management objective identified for this population. The five year (2015-2019) average general season harvest is 5 moose. An average of two moose are reported harvested each year by federally qualified subsistence users and 3 moose annually are harvested by non-federally qualified subsistence users. The average of five moose that are currently being taken from the Colville moose population is well below the ANS and constitutes a 1.5% harvest rate on this population.

A controlled use area exists for the whole of 26A and has existed for decades. From July 1-September 30 and from January 1-March 31, the area is closed to the use of aircraft for moose hunting, except under the terms of a drawing permit, including the transportation of moose hunters, their hunting gear, and/or parts of moose. However, this does not apply to transportation of moose hunters or their gear, or moose parts by aircraft between publicly owned airports in the controlled use area.

There are currently three hunts in 26A areas open to residents of the State of Alaska, there are no non-resident hunts open. All of the hunts are being managed under the GM000 harvest ticket.

GMU 26A- That portion of the Colville River drainage upstream from (and including) the Anaktuvuk River drainage 1 bull August 1-September 30. The Federal regs have the bag limit and hunt area the same; however, the season is July 1-September 14.

GMU 26A-West of 156 00' W. long, excluding the Colville River drainage, one moose; however, a person may not take a calf or cow accompanied by a calf on a harvest ticket July 1-September 14.

26A Remainder-One bull by harvest ticket August 1-September 30. The Federal regs have the bag limit and hunt area the same; however, the season is August 1-September 14.

There is one additional hunt available to 26A residents under federal regulations. The hunt area for the additional federal hunt is that portion of the Colville River drainage upstream from (and including) the Anaktuvuk River drainage-1 moose; however, you may not take a calf, or a cow accompanied by a calf February 15-April 15.

The drawing hunt was last described in the 2015 State of Alaska hunting regulation book: no drawing permits have been issued since.

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