The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, February 16-23, 2018 in Dillingham, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

**PROPOSAL 165 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a registration permit hunt for moose in Unit 19A.

**PROPOSED BY:** Henry Hill

**WHAT WOULD THE PROPOSAL DO?** This proposal would create a Tier I registration permit for moose hunting in the portion of Unit 19A that is currently closed.

**WHAT ARE THE CURRENT REGULATIONS?** There are currently two Tier II hunts in Unit 19A. One is within the Kuskokwim River drainage downstream of and including the George River and downstream of and excluding Downey Creek, one antlered bull by permit (TM680), September 1–20. The other is within the Lime Village Management Area (LMVA), two bulls by permit (TM684), August 10–September 25 and November 20–March 31. The remainder of Unit 19A is closed to all moose hunting.

The board has made a positive C&T finding for moose in Unit 19. In terms of amounts reasonably necessary for subsistence, the ANS for Unit 19 outside the Lime Village Management Area is 400–700 moose, including 175–225 moose in Unit 19A and 20–24 moose in Unit 19B. In Unit 19 inside the Lime Village Management Area, the ANS is 30–40 moose.
WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were to pass, a new Tier I registration permit would allow hunting in the portion of Unit 19A that is currently closed.

BACKGROUND: Prior to regulatory year 2000 (RY00; that is, 1 July 2000-30 June 2001) moose hunting in 19A (outside the LVMA) was fairly liberal with a bag limit of 1 bull during September 1–20 or November 20–30. There was an additional winter hunt during February 1–10 below and including the Kolmakof and Holokuk Rivers with a bag limit of any bull. Upstream of those rivers, the bag limit was any moose. However due to growing concern over declining moose numbers, the February season was closed by emergency order in RY00 in all of Unit 19A. The season was again closed by emergency order in RY01 in that portion upriver of the Kolmakof and Holokuk Rivers.

In 2002 the Board of Game made several regulatory changes including shortening the winter hunt upstream of the Kolmakof and Holokuk Rivers by 5 days to February 1–5 and changing the bag limit from 1 moose to 1 bull. In addition a nonresident closed area was created through a 2-mile buffer area on either side of the major drainages in Unit 19A and in portions of Unit 19B. Furthermore the board requested that the department initiate a planning process to more completely address concerns about declining moose numbers in Units 19A and 19B.

As requested, a planning process began in October 2002. The Central Kuskokwim Moose Management Planning Committee (CKMC) was created with members representing Fish and Game Advisory Committees (ACs), guides, transporters, Native organizations and conservation groups. This committee was not able to reach a consensus on all recommended regulatory actions. However, when the board met in 2004 they endorsed the committee’s Central Kuskokwim Moose Management Plan and adopted the majority’s recommendations with minor revisions. These changes included closing all of Unit 19A to nonresidents, eliminating the November and February seasons and creating a Tier I registration hunt for residents. The board also adopted findings to authorize wolf control in all of Unit 19A; aerial shooting of wolves began in RY04.

The registration hunt implemented by the board lasted 2 years with just over 1,000 permits issued each season and an average of 147 moose harvested. Continuing concern over the level of harvest led to further disagreement within the Central Kuskokwim Advisory Committee. Representatives from the western villages (Lower Kalskag, Kalskag, Aniak, Chuathbaluk and Crooked Creek) in Unit 19A generally favored maintaining hunting opportunity, while representatives from the eastern villages (Red Devil, Sleetmute, Stony River, Lime Village) wanted to close the season entirely and allow the moose population to grow.

Multiple proposals were submitted for the March 2006 Board of Game meeting that addressed seasons and bag limits in Unit 19A, including proposal 70 submitted by the department. That proposal recommended creating a Tier II hunt in the western portion of Unit 19A (downstream of and including the George River and downstream of and excluding Downey Creek) and closing eastern Unit 19A outside the LVMA (Unit 19A remainder). This proposal was based on moose survey data from 2005 that indicated the harvestable surplus was being exceeded using the registration permit. The department determined there was no harvestable surplus in Unit 19A remainder and a harvestable surplus of only 60 moose in western Unit 19A.
After considerable deliberation, the board modified the Unit 19 ANS from 400-700 moose with 30-40 in the LVMA to the current ANS of 400-700 moose with 30-40 in the LVMA, 175-225 in the remainder of Unit 19A, and 20-24 in Unit 19B. Proposal 70 passed and the board changed the western Unit 19A season to a Tier II hunt downstream of and including the George River and downstream of and excluding Downey Creek. The LVMA remained Tier II and the remainder of Unit 19A was closed to all moose hunting. Those seasons remain in effect today and the moose in Unit 19A outside of the LVMA are managed under 2 different hunt structures.

After continuing disagreement over moose management in Unit 19A, the Central Kuskokwim AC submitted a proposal to split the AC. At a Joint Board of Fisheries and Game meeting in October 2007, proposal 17 passed, creating the new Central Kuskokwim AC which represents the villages of Lower Kalskag, Kalskag, Aniak, Chahta Baluk, and Crooked Creek, and the Stony-Holitna AC (SHAC) which represents Red Devil, Sleetmute, Stony River and Lime Village. This split has allowed each AC to take a more direct role in moose management in their respective areas.

In 2009 the board reauthorized wolf predation control for another 5 year period. Land status and weather had severely limited wolf take in western Unit 19A and the new plan only authorized wolf control upstream of and including the Holitna River drainage. This area is upstream of Sleetmute along the Kuskokwim River and also includes the Stony River drainage. A moose survey of that area in 2011 did not show an improvement in moose numbers when compared to 2005 data and the board modified the predation control plan in 2012 to include a bear control area encompassing 534 square miles (mi²).

Bear control was conducted by the department in May of 2013 and 2014. In 2013 the department removed 84 black bears (89% removal) and 5 grizzly bears. In 2014 the department removed 54 black bears and 10 grizzly bears. Survival of moose calves improved immediately after bear control and November calf:cow ratios have been above 50 calves:100 cows. The board reauthorized the intensive management plan in March 2014 for a 6 year period and wolf control continues to date.

A GeoSpatial Population Estimator (GSPE) moose survey was conducted in all of 19A in February 2017. We estimated 1,932 moose (0.6 moose/mi²) in the 3,419 mi² closed portion of 19A. This shows slight improvement from a similar GSPE survey conducted in 2005 which showed 0.3 moose/mi². While the overall density in Unit 19A remainder (the closed area) remains low, the bull:cow ratios from fall composition surveys in 2013 and 2016 were 55 bulls:100 cows and 58 bulls:100 cows, respectively. Additionally the harvestable surplus for all of Unit 19A (excluding LVMA) is now 242 moose.

**DEPARTMENT COMMENTS:** The department is NEUTRAL on the allocative aspects of this proposal; however, if the board chooses to open a hunt, the department recommends a very conservative approach be taken in order to restrict and closely monitor the harvest. This area has been closed since 2006 and caution is needed to ensure the modest gains made over the last 12 years are not erased by an overly aggressive hunt. It is essential that harvest be limited because, while moose densities in Unit 19A have improved overall, most of this improvement has taken place in the western portion of the Unit. Although there is a high bull:cow ratio in the closed area and calf:cow ratios have improved, little growth has yet been realized in this portion of Unit 19A.
Demand for moose hunting in the Kuskokwim drainage is high: for example, 300 permits are issued in the western portion of Unit 19A (200 Tier II permits and 100 federal permits) and close to 1,500 permits are issued for the registration hunt in Unit 18 on the Kuskokwim (RM615).

**COST ANALYSIS:** Adoption of this proposal would not result in significant additional costs for the department.