



## MEMORANDUM

TO: Anthony Christianson, Chair  
Federal Subsistence Board

DATE: April 22, 2021

PHONE: 267-2190

FROM: Ben Mulligan <sup>BJM</sup>  
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 Unit 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 as 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 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 the Alaska Dept. of Fish and Game. ANILCA requires the Federal Subsistence Board (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 those game populations, including 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 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 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.

## **Background**

### **Caribou**

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

#### **Western Arctic Caribou Herd**

The WAH is the largest of the two herds and was estimated at 244,000 in 2019, down slightly from the 2017 estimate of 259,000 and up from the most recent low of 201,000 (2016) (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 Amount Necessary for Subsistence (ANS) of 8,000-12,000. During the recent decline, the WAH neared the upper limit of the IM population objective of 200,000, then quickly increased back to around 250,000 animals. The department plans to conduct a census during the summer of 2021 providing an updated estimate at the end of the year. The lack of growth and apparent stability is largely attributed to above average adult female mortality which occurred between 2018-2020. The average mortality for the 3-year period was 28% compared to the long-term average (1985-2020) of 18%. During the same timeframe, 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 2020 was 18:100 (short-yearlings: adults) vs the long-term average of 17:100 between 1998 and 2020. Calving rates averaged 78% between 2018 and 2020 while the long-term average between 1992 and 2020 is 69%. These metrics combined with the most recent population estimates seem to indicate relative stability in the WAH at the current time. The distribution of the WAH varies considerably from season to season (Figure 2).

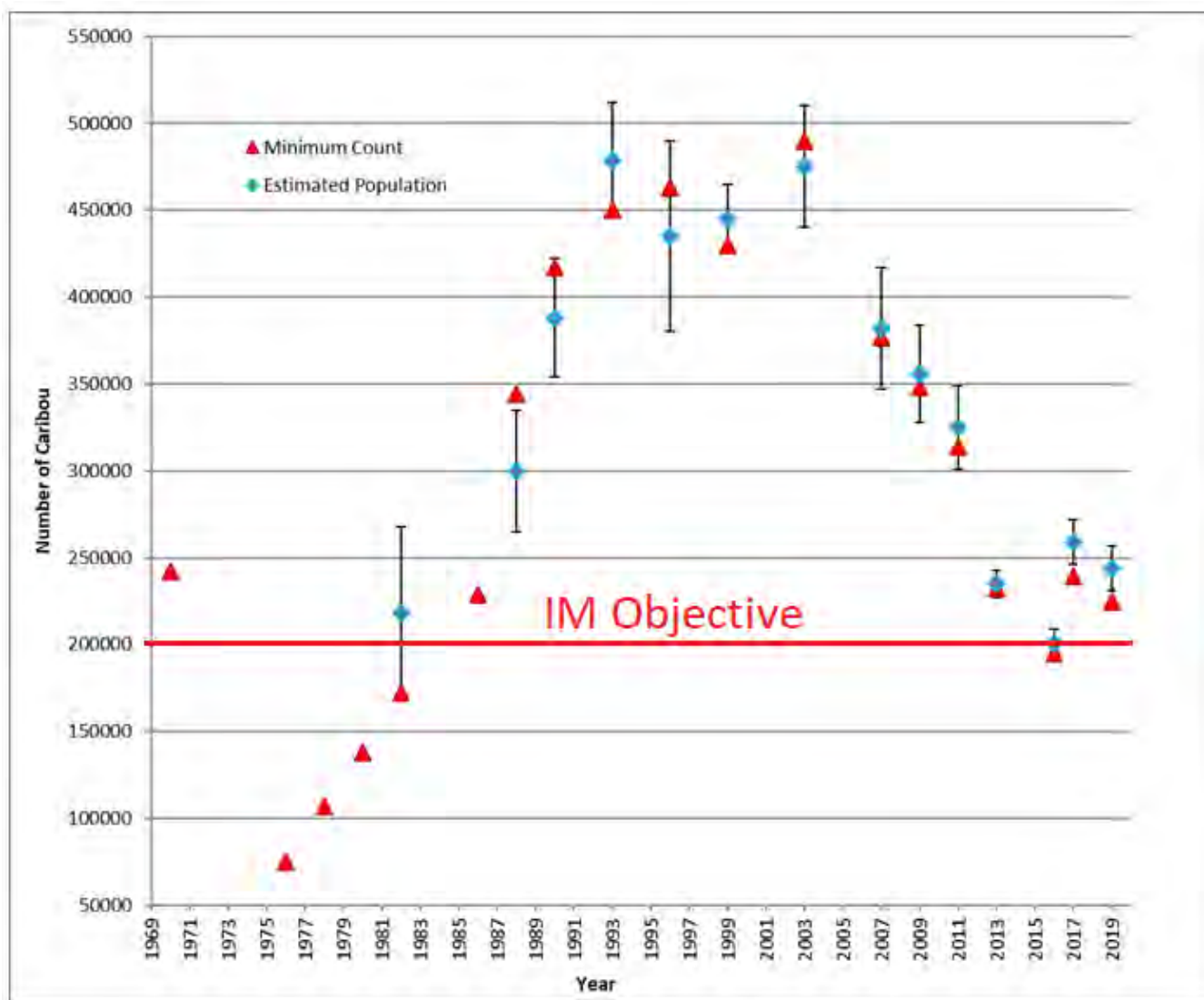


Figure 1. Population estimates and minimum counts for the WAH 1970-2019.

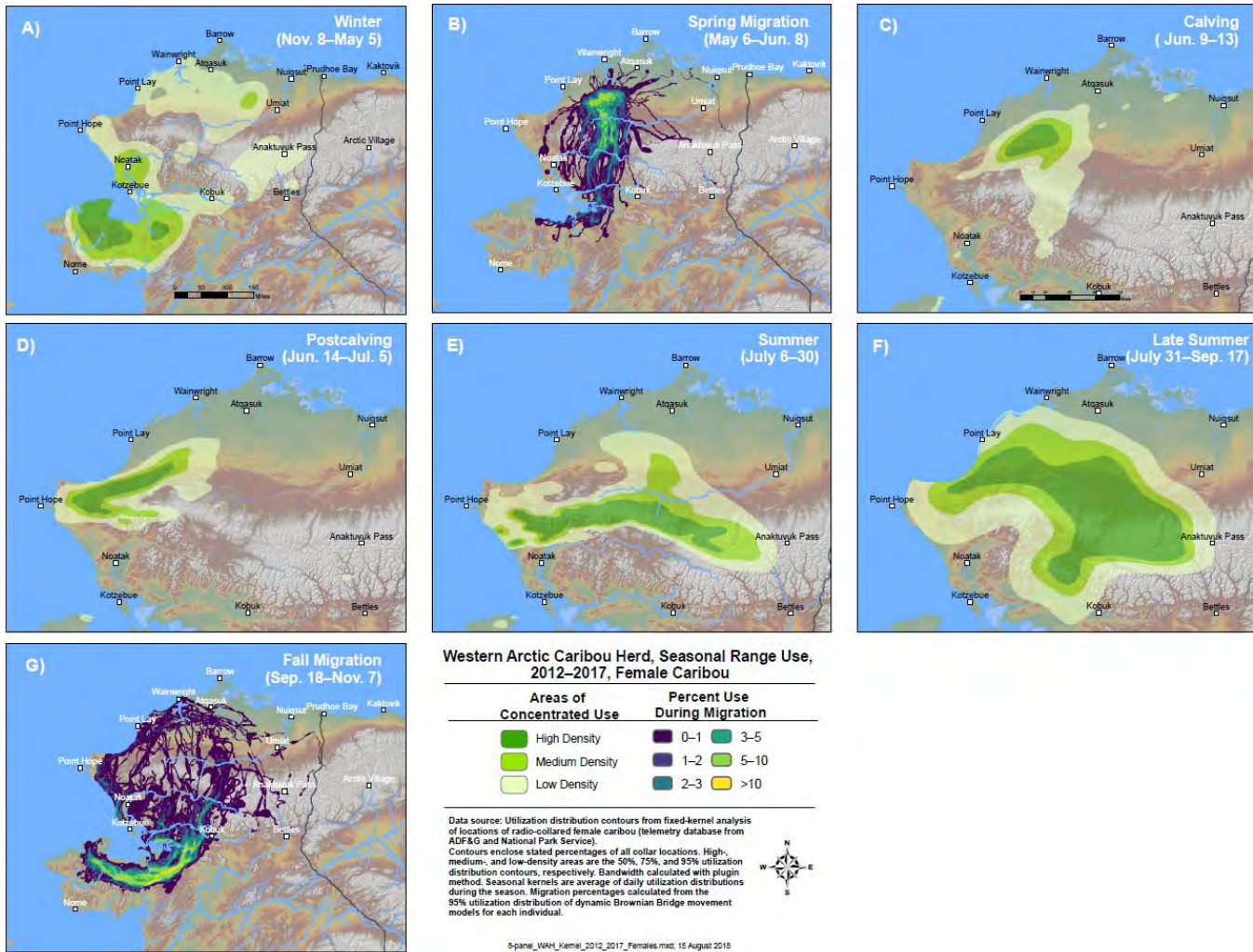


Figure 2. Seasonal distribution of WAH female caribou 2012-2017.

### Teshekpuk Caribou Herd

ADF&G manages the TCH with an intensive management objective of 15-28,000 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 insignificant compared to harvest by local residents.

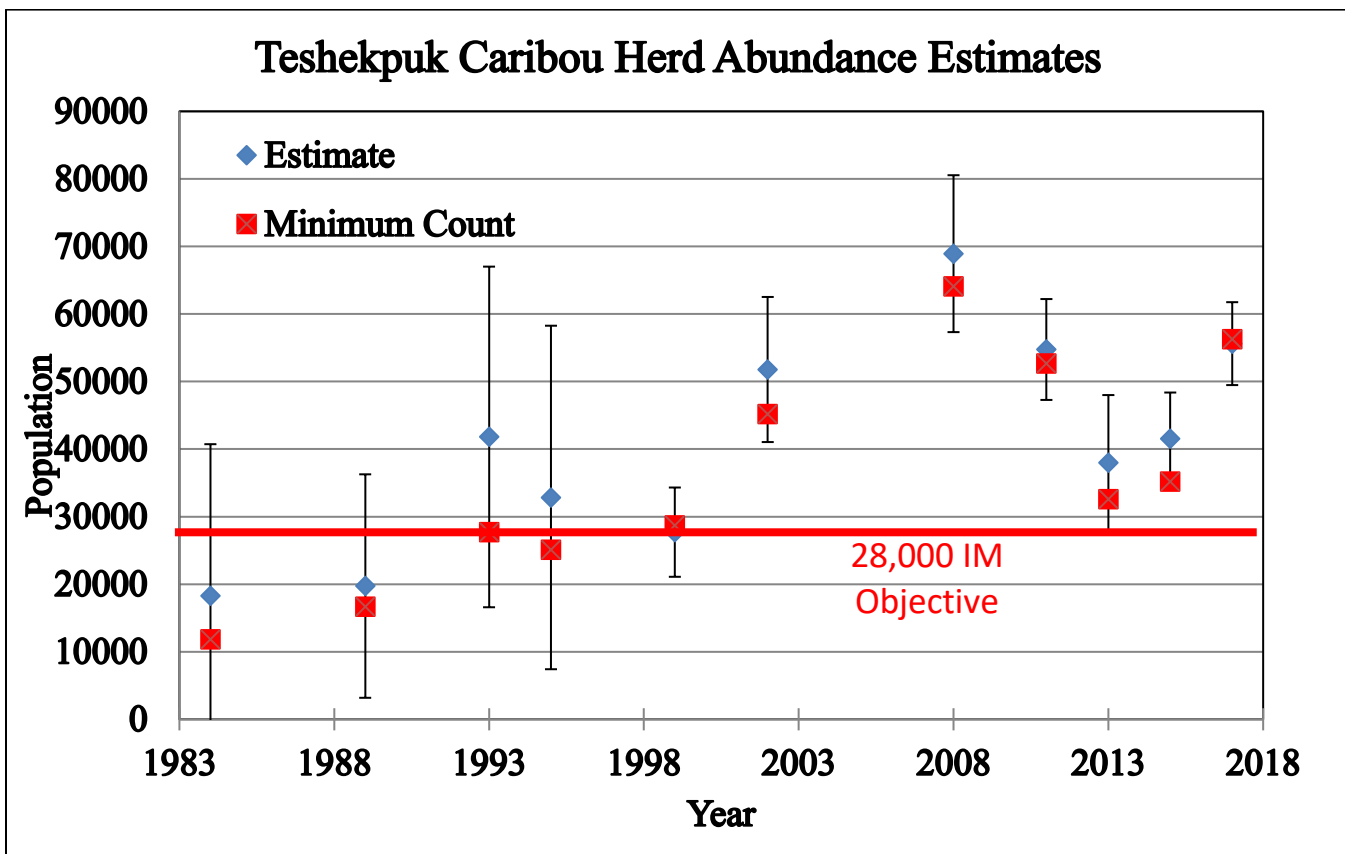


Figure 3. Teshekpuk caribou herd abundance estimates and minimum counts 1984-2017.

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 spring 2020 survey 39 collars were located and a corresponding 4,257 caribou were surveyed. There were 447 calves and 3,810 adults observed resulting in an estimated 11% recruitment rate, while this recruitment rate is on the lower end of the normal range it is not outside the long-term range of recruitment observed 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 2020 parturition survey, 66 females over the age of 2 years were observed and 56 were parturient. A total of 37 (66%) live calves were observed at heel. The 56 parturient caribou observed results in an estimated parturition rate of 85%, which is well above the average of 68% (2010-2020). Adult female mortality from 2019-2020 was ~12% which is 2% lower than 15% the 27-year average (1990-2017). The vast majority of the lands in 26A are either managed by Bureau of Land Management or by National Park Service and much of the state managed lands are located around North Slope communities. It is highly likely that closing federal lands to moose and caribou hunting will concentrate NFQUs to state managed lands near those communities.

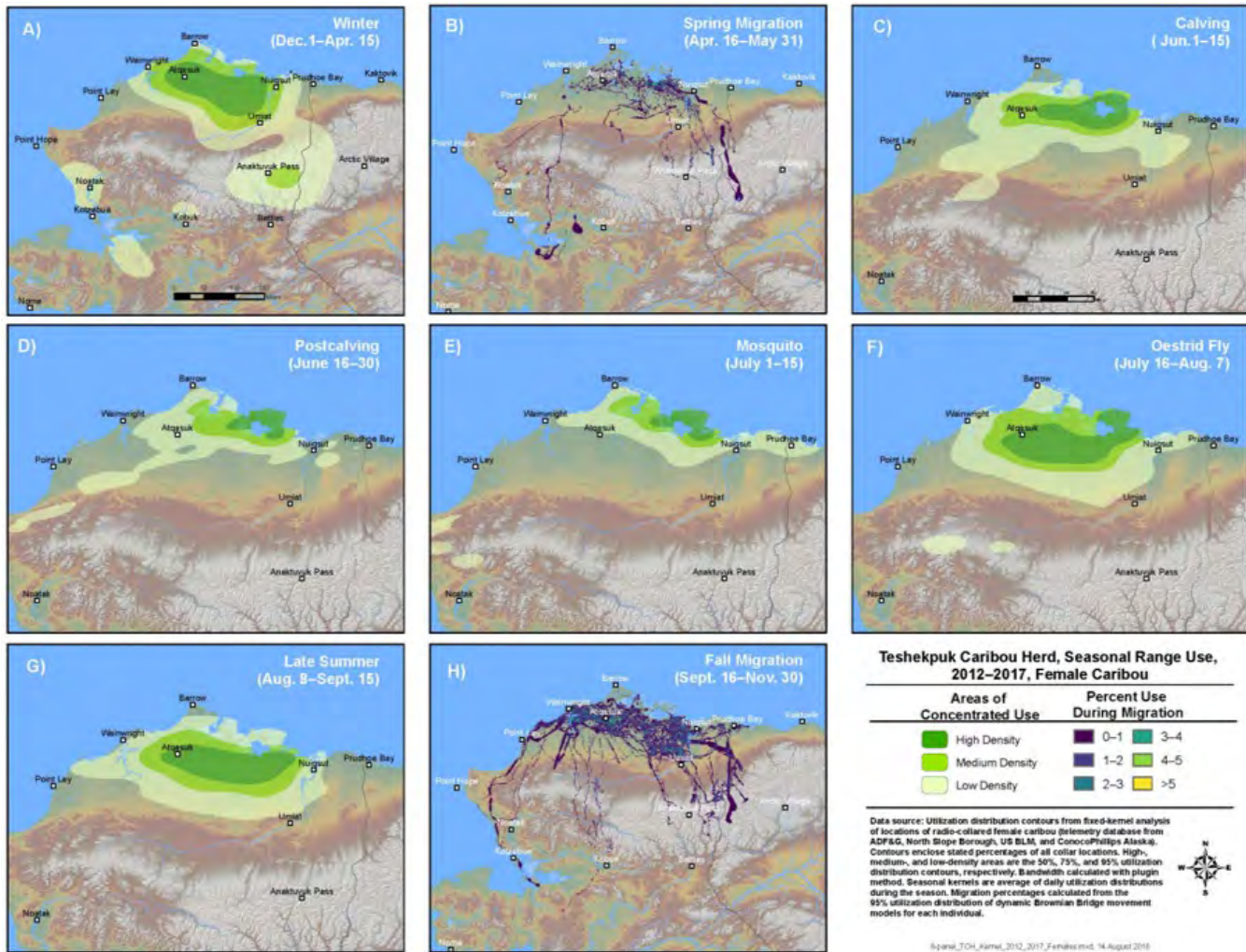


Figure 4. Seasonal distribution of female TCH 2012-2017.

## Moose

### Unit 23

Moose began appearing within Unit 23 in the mid-20<sup>th</sup> century as their range expanded eastward from the interior of the state. The region saw a continued increase in moose populations through the late 1980's however, a series of severe winters and heavy spring flooding through the early 1990's 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 unit's moose population began to stabilize then decline. Moose densities throughout the region remained low.

Through the late 1990's and early 2000's all moose harvest in Unit 23 was conducted under the state's general moose harvest ticket. In 2000 a positive C&T finding was determined for moose within the unit 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 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 Unit 23 moose. The implementation of these hunts, and changes in season dates, were intended to reduce and distribute moose harvest within the unit 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 RY17 at which point biologists determined that continued population declines warranted a reduction in harvest and a move to bull-only harvest. In RY17 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 Unit 23. The RM880 permit allows for the harvest of a single antlered bull between July 1- December 31 in Unit 23 north of, and including, Singoalik River drainage and between August 1- December 31 in the remainder of Unit 23. RM880 permits are only available for pickup in person from license vendors in Unit 23 villages from June 1-July 15. Alternatively, resident 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 resident wishing to hunt on Federal land must possess either an RM880 or general harvest ticket. Moose hunting on Cape Krusenstern National Monument and Kobuk Valley National Park is limited to residents of Unit 23 and must be conducted under the federal subsistence regulations. Federal subsistence seasons are from August 1-Dec 31 and allow for the take of one antlered bull.

#### Unit 26A

The 2017 minimum count identified 348 moose with 17.4% short yearlings on the Colville moose population. The Colville moose population is on the lower end of their population range currently (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).

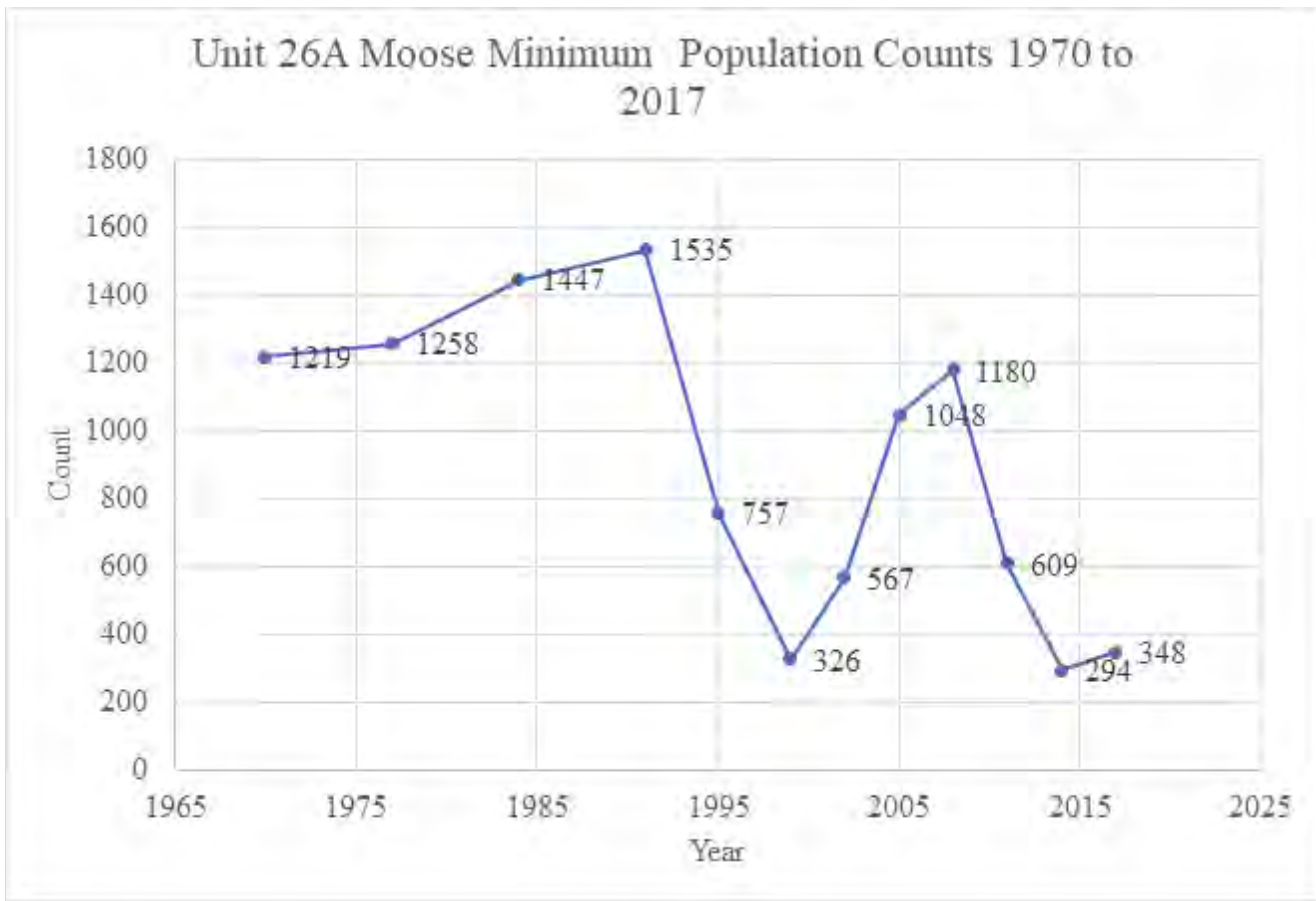
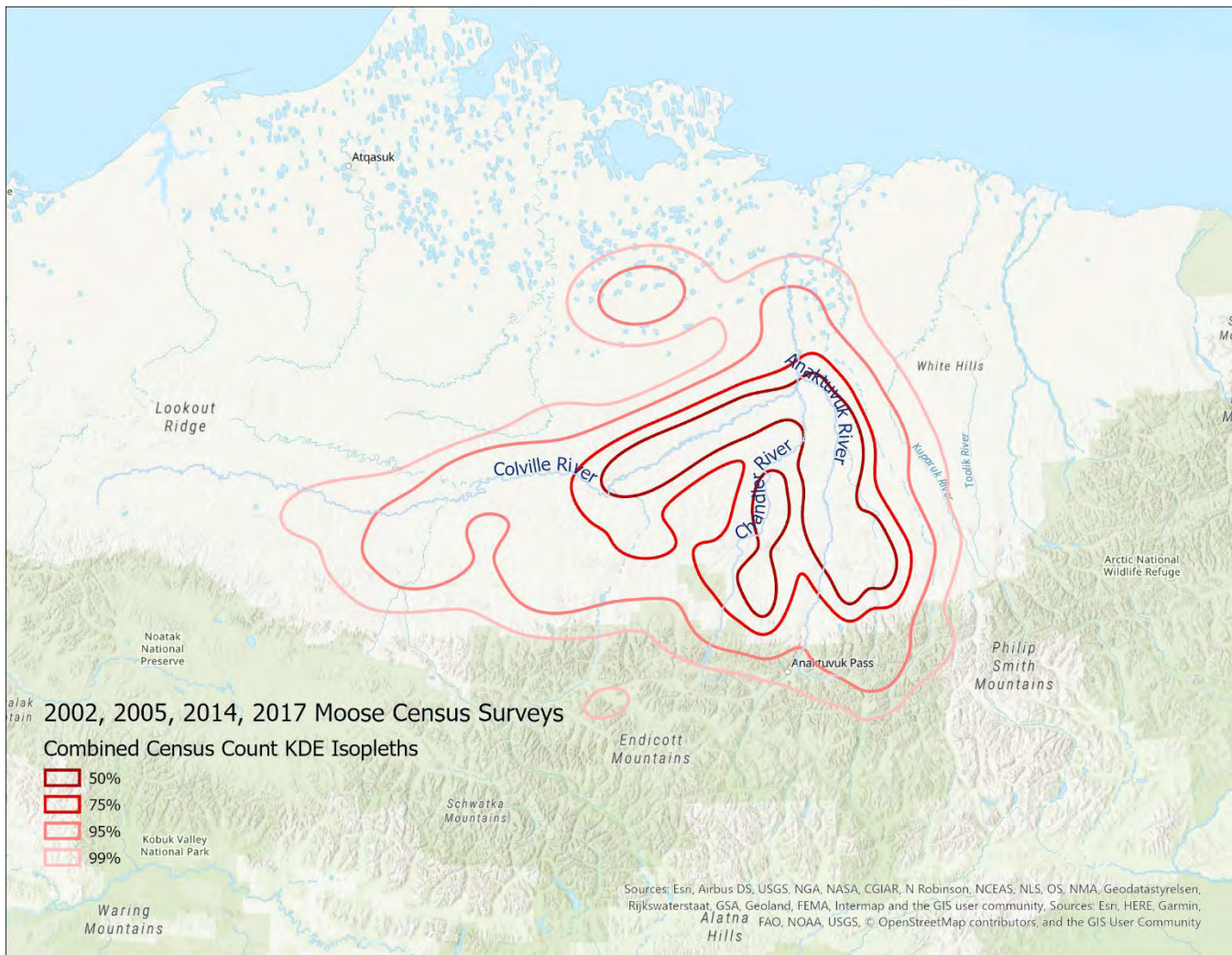


Figure 5. Colville moose minimum count survey data 1970-2017.



**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 Unit 23 since at least the early 1980's. 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 Unit 23 residents who were previously accustomed to predictable fall time hunting patterns along the Kobuk River. Unit 23 residents frequently state 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 and created the Noatak controlled use area (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<sup>th</sup> and September 20<sup>th</sup>. 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 Aug 15 – Sept 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.

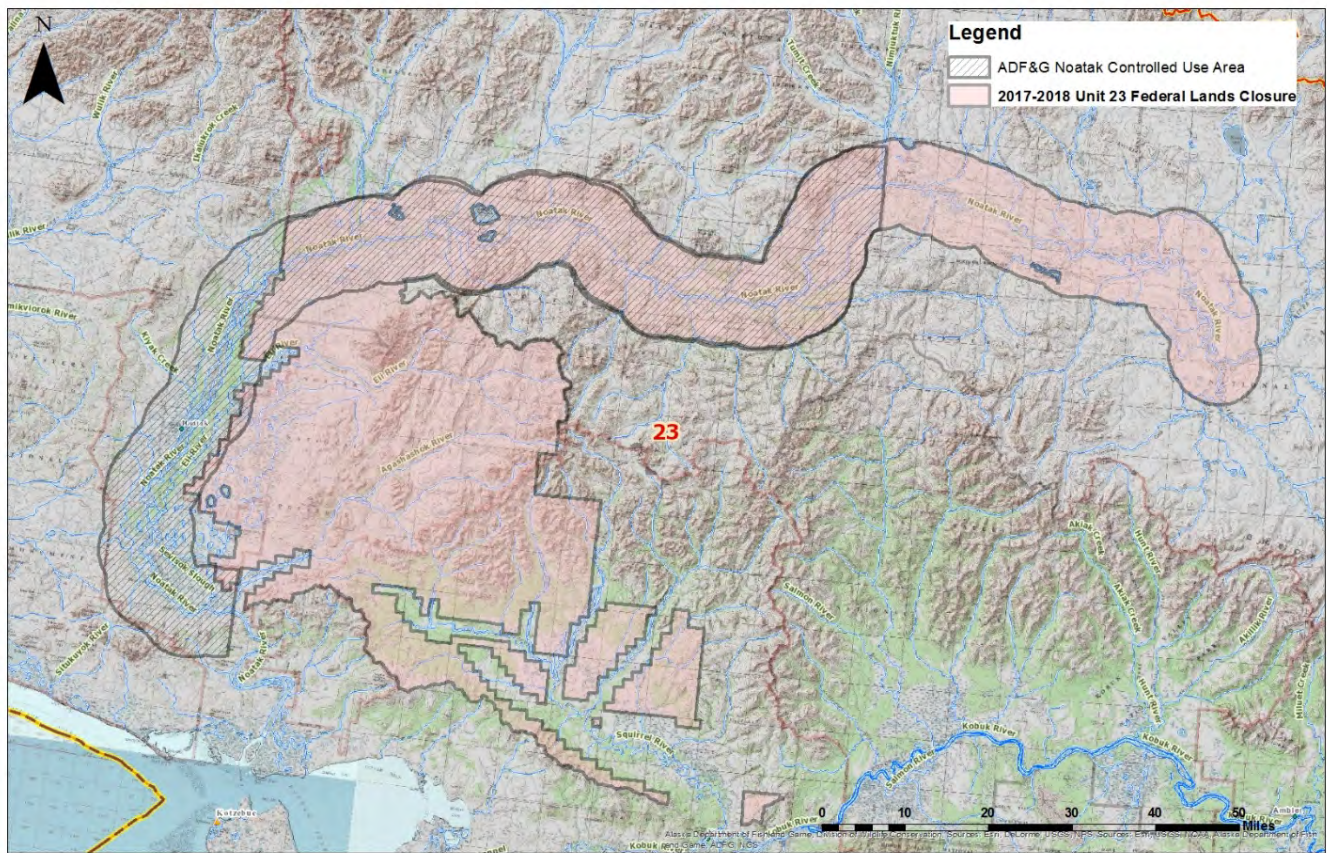


Figure 7. Fall caribou hunting restrictions, ADF&G Noatak CUA and Federal lands closed to NFQU's (red), closed areas along the Noatak river include a 5-mile buffer on either side of the river.

Proposal 202 was amended and adopted by the BOG in 2015 to modify the state caribou hunting seasons and bag limits from 5 per day to the following:

Western Arctic and Teshekpuk Caribou Herds: Units 21D remainder, 22A north, 22B remainder, 22D Kuzitrin, 22E east, 23 remainder, 24C and 24D, change the resident bag limit and season to 5 caribou per day with no harvest of calves, bulls are open from Feb. 1 - Oct. 14 and cows are open from Sept. 1 - Mar. 31; change the nonresident season to Aug. 1 - Sept. 30 with a bag limit of one bull; Units 22B west and 22D Pilgrim River drainage, a season may be announced from May 1 - Sept. 30, if a season is announced the resident bag limit and season will be 5 caribou per day with no harvest of calves, bulls are open Feb. 1 - Oct. 14 and cows are open from Oct. 1 - Mar. 31; if a season is announced, the nonresident bag limit and season will be 1 bull from Aug. 1 - Sept. 30; Unit 22 remainder, a season may be announced by emergency order, if a season is announced the resident bag limit and season to 5 caribou per day with no harvest of calves, bulls will be open from Feb. 1 - Oct. 14 and cows will be open from Sept. 1 - Mar. 31, if a season is announced the nonresident bag limit and season will be 1 bull from Aug. 1 - Sept. 30; Units 23NW, 24A remainder, and 24B remainder, change the resident bag limit and season to 5 caribou per day with no harvest of calves, bulls are open from Feb. 1 - Oct. 14 and cows are open from July 15 - Apr. 30, change the nonresident bag limit and season to 1 bull from Aug. 1 - Sept. 30; 26A that portion of the Colville River drainage upstream from the Anakutvuk River and drainages of the Chuckchi Sea south and west of and including the Utukok River drainage,

change the resident bag limit and season to 5 caribou per day with no harvest of calves, bulls are open from Feb. 1 - Oct. 14 and cows are open from July 15 - Apr. 30, the nonresident bag limit and season are 1 bull from July 15 - Sept. 30; 26A remainder, change the resident bag limit and season to 5 caribou per day, no more than 3 cows per day, and no calves may be taken from July 1 to June 30, however, bulls may not be taken from Oct. 16-Dec 31, cows may not be taken Mar. 16- July 15, and cows with calves may not be taken July 16- Dec. 31, nonresident bag limit and season are one bull from July 15 - Sept. 30; Unit 26B south of 69 30' N. latitude and west of the Dalton Hwy, change the resident and nonresident bag limits and seasons to 5 caribou from May 16 - June 30, however cows may only be taken from July 1 - Oct. 10.

Perhaps the most notable regulatory event that has taken place in recent years (WSA 16-01) was approved by the Federal Subsistence Board (FSB) which closed all federal lands to Non-Federally Qualified Subsistence Users (NFQU's) for the purpose of caribou hunting in the fall of 2016. This decision was in response to a request from the Northwest Arctic Regional Advisory Council (NWARAC) and was followed up by a permanent targeted closure prohibiting caribou hunting by NFQU's in a portion of the Noatak preserve the following year, the closure effectively extended the Noatak CUA to the Cutler River (figure 7). Since the 2017 closure, 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 Unit 26A established in RY06-07 concerning the lands surrounding Anaktuvuk Pass from August 15-Oct 15, the area is closed 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. Anaktuvuk Pass residents frequently state aircraft is responsible for caribou not migrating through the pass. This has been an ongoing topic of discussion for many years.

## **Management Strategies**

### **Caribou**

Annual harvest has been coarsely estimated at approximately 12,000 for the WAH and 3,500 for the TCH using household harvest survey data (ADF&G Subsistence Division) combined with 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. It should however be understood that harvest estimates acquired through this approach are unable to capture short-term variations in harvest and that WAH harvest might be suppressed 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 better understand caribou harvest. The Department has undergone extensive efforts since that time to institute the permit and has experienced mixed success. Conservative estimates indicate that reported harvest in Unit 23 is approximately 10% of actual harvest and there are ongoing efforts being made by the Department to improve that reporting rate.

In the WAH, NFQU (Alaska residents) harvested 56 caribou in 2017, 80 in 2018, and 56 in 2019 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 Unit 26A, indicates harvest by Alaska resident NFQU'S 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 ranged from 10-40 caribou per year. Combined average harvest for NFQS's for both herds between 2017 and 2019 was between 300 and 350 caribou which equates to approximately 2.5% of total harvest.

## **Moose**

### Unit 23

Unit 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 unit wide moose abundance estimate that spans multiple years (Figure 8). The current population estimate for Unit 23 is 5,600 moose (2010-2019) and represents an extrapolated estimate that accounts for unsurveyed land. Moose densities within the unit range from 0.03-0.22 adults/mi<sup>2</sup> and spring recruitment ranges from 12-23% short yearlings. The Unit 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 harvest is 116 moose (2016-2020). Federally qualified subsistence users (FQU) have accounted for 69-86% of harvest between 2016-2020 (Figure 9) with Non-federally qualified subsistence users (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 10 and 11). While participation under the general harvest ticket hunt has decreased overall between 2016 and 2020 from 69 hunters in RY16 to 31 in RY20 (Figure 12).

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

<sup>a</sup> Generated as Total Moose in the geospatial model and therefore, does not usually equal the sum of adults and calves.

<sup>b</sup> Expressed as a percentage of the estimate.

Figure 8. Unit 23 spring geospatial moose survey results, 2009–2019 (Surveys conducted cooperatively by ADF&G, NPS, USFWS and BLM).

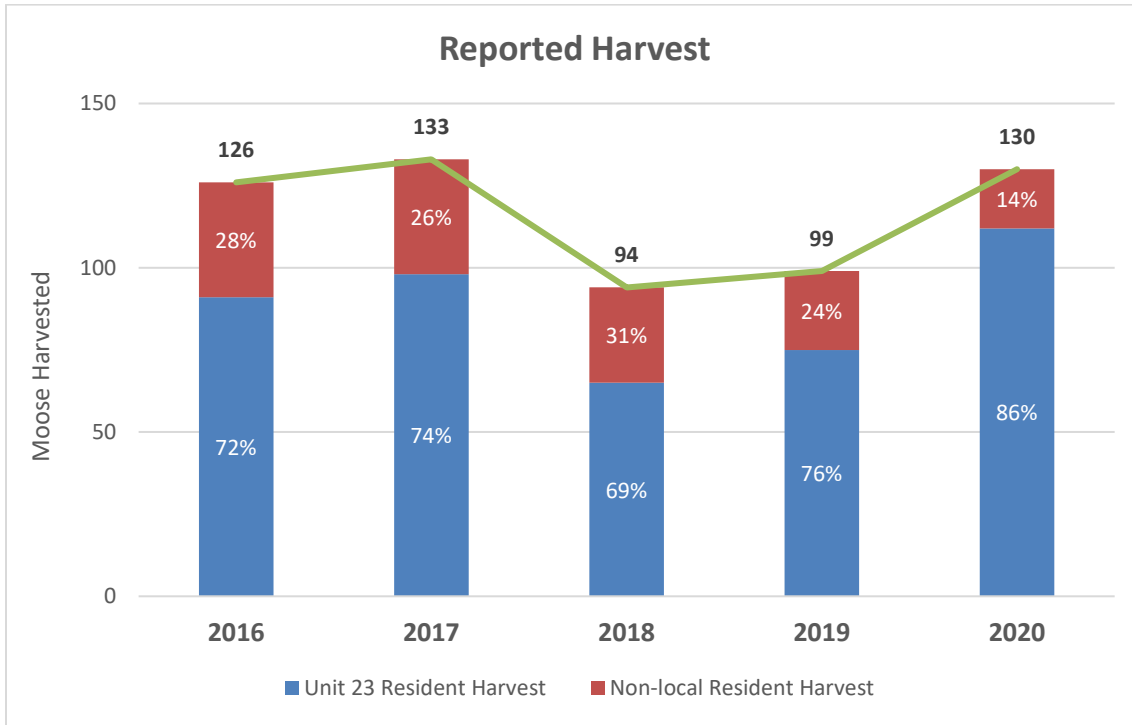


Figure 9. Unit 23 reported moose harvest, 2016-2020.

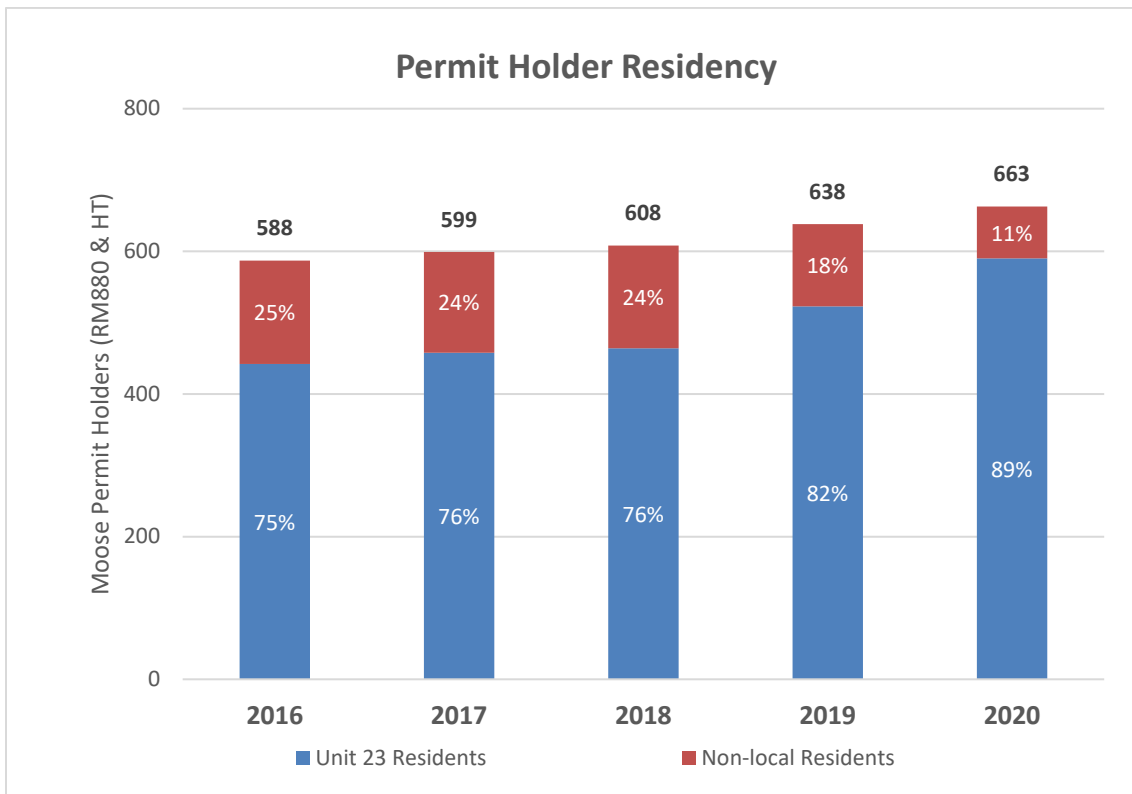


Figure 10. Unit 23 RM880 and general harvest ticket permit holder residency, 2016-2020.

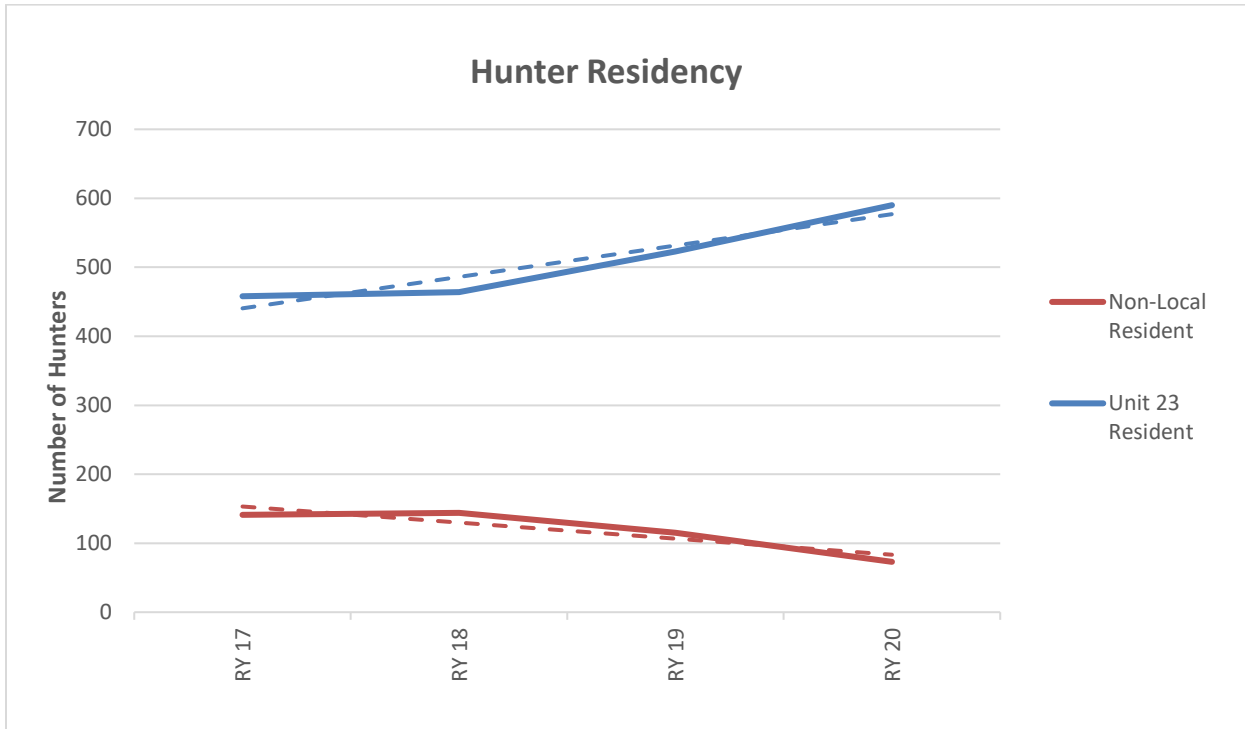


Figure 11. Unit 23 RM880 and general harvest ticket permit holder residency, RY17-20.

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

Figure 12. Unit 23 RM880 and general harvest ticket (GM000) permit and harvest statistics, 2016-2020.

Unit 26A

The ANS for the Colville moose population is 15-30 moose. There is not an 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 has existed for decades now as well. From July 1-September 30<sup>th</sup> and from Jan 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 them are being managed under the GM000 harvest ticket.

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

Unit 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<sup>th</sup>.

26A Remainder-One bull by harvest ticket Aug. 1-Sept 30. The Federal regs have the bag limit and hunt area the same however, the season is Aug. 1-Sep. 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.

Cc: Eddie Grasser, Director, Division of Wildlife Conservation  
Ryan Scott, Assistant Director, Division of Wildlife Conservation  
Lisa Olson, Operations Manager, Subsistence Section  
Cheryl Brooking, Assistant Attorney General, Department of Law