

## **Proposal 32**

### **5 AAC 99.025(a)(8). Customary and traditional uses of game populations.**

Revise the GMU 22 moose ANS to 350–450 moose annually up from the current ANS of 250–300 as follows:

**What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?**

Revise the GMU 22 moose ANS to 350–450 moose annually. My proposed ANS would exceed the current ANS of 250–300 but is still below the potential number of moose hunters that participate each year. Based upon a review of moose permits I think it is possible that multiple persons in a household are applying for permits and I have attempted to come up with an ANS that reflects household level data. An ANS of 350–450 largely reflects RM840 demand but still leaves enough management flexibility to continue the general permit hunts in 22A, 22B East and 22E. The derby style hunt outcomes we have been experiencing in 22B, 22C, & 22D are a result of high demand. According to ADFG data it appears that approximately 590+ hunters participate in moose hunts across 22 A, B, C, D, & E. Those numbers reinforce the need for a revised ANS, those numbers do NOT undercut a higher ANS. The derby style hunts impact reasonable opportunity. I believe the BOG has an obligation to identify need. I do not believe the BOG should be bound by moose harvests we have achieved under the derby style hunts we have been experiencing. ANS does NOT equate to a quota it should equate to the many sociological factors that make up our customary and traditional use. I am not saying 350–450 moose can be harvested I am proposing that 350–450 is reasonably necessary for subsistence uses. Looking ahead, regional development including the Port of Nome expansion and the proposed Graphite One project has the potential to increase human population, access, and demand for subsistence resources over the coming decades. Without a corrected ANS there will not be proactive management, but rather prolonged avoidance of a problem that requires a solution. The rapid 1–2 day RM840 closures is NOT “reasonable opportunity”. AS 16.05.258(b) requires reasonable opportunity for subsistence. Under the current ANS, harvest fails to meet need. Even if ANS were corrected the GMU 22 moose hunt may still be insufficient but I believe doing so may have the effect of increasing reasonable opportunity. The Board faces a clear choice: address the moose hunt in GMU 22 now through a deliberate revision of the ANS, or continue to defer the issue. Failure to modernize the ANS delays the statutory mechanisms designed to meet the needs of subsistence users. The current management framework already demonstrates that reasonable opportunity for subsistence users is not being provided. The number of RM840 permits provides a direct indicator of subsistence demand for moose in GMU 22. Demand for moose has remained consistently high even during years with rapid emergency closures and shortened seasons. This indicates a strong reliance on moose. The current GMU 22 moose ANS is outdated and does not reflect subsistence demand, household participation, or community reliance on moose. Emergency closures lasting one to two days do not provide reasonable opportunity as required by AS 16.05.258(b).

Failure to revise the ANS perpetuates a management framework in which subsistence need is systematically underrepresented, and conflicts are deferred rather than addressed. Revising the ANS is a necessary step to meaningful subsistence management in GMU 22 and should occur independently of current biological constraints or short term harvest outcomes.

**What is the issue you would like the board to address and why?**

Revise ANS upward based on permits issued and demonstrated demand. The core principle I am arguing is the ANS must reflect demonstrated subsistence demand. When harvest is capped by quota and season length, hunter success is not a valid method to determine subsistence need. RM840 permits + rapid closures has resulted in suppressed harvest. Suppressed harvest doesn't equal reduced need. The GMU 22 ANS is outdated and artificially low. Current moose harvest is constrained by EO driven closures and does not reflect number of permits issued or community reliance on moose. This proposal for ANS uses subsistence demand rather than actual harvest, consistent with AS 16.05.258 and 5 AAC 99.010. Moose harvest is constrained by quota, short seasons, and emergency closures, harvest outcomes should not be used as a proxy for subsistence need. With this proposal I request that the AK Division of Subsistence take a deep dive into ANS and engage the communities to better understand the issues

**Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?**

This proposal was developed through review of publicly available Alaska Department of Fish and Game data, Board of Game and Federal Subsistence Board actions, and subsistence harvest information for GMU 22. The proposal also reflects concerns that have been raised consistently by my fellow subsistence users across Unit 22 regarding limited access, short duration seasons, and repeated emergency closures.

This proposal was not formally adopted or sponsored by a local fish and game advisory committee prior to submission however for decades I have been advocating for revision of the ANS at the advisory committee level and via past BOG proposals. The intent of this proposal is to advance the long standing concerns to the Board for formal consideration using the best available data under the subsistence priority for a modernized ANS for moose in GMU 22.

**PROPOSED BY:** Austin Ahmasuk (OI-F26-147)  
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