

INTERAGENCY STAFF COMMITTEE COMMENTS
WILDLIFE SPECIAL ACTION REQUEST WSA18-03

The Interagency Staff Committee (ISC) supports the adoption of WSA18-03, as modified by the Office of Subsistence Management (OSM) in their preliminary conclusion, to close the Dec. 1–Dec. 31 antlerless moose season in Unit 22D remainder and extend the closure for the remainder of the wildlife regulatory cycle (July 1, 2018–June 30, 2020). This is partially consistent with the recommendation of the Seward Peninsula Subsistence Regional Advisory Council (Council). The ISC supports the modification to extend the duration of this special action until the next regulatory cycle to avoid the necessity of subsequent, repetitive special action requests. The BLM has indicated that they will submit a formal proposal to remove the antlerless moose hunt from federal regulations at that time.

The ISC does not support the Council’s recommended modification to also close moose hunting on Federal public lands in Unit 22D remainder to non-federally qualified hunters; an alternative that was explored in OSM’s analysis but not considered further due to a number of concerns. There is not enough information in the analysis to justify a closure to non-federally qualified hunters based on the continuation of subsistence uses or for the conservation of healthy populations of moose in the area. Due to the region’s remoteness and the broken pattern of BLM managed lands in the sub-unit, compliance with and enforcement of such a closure would be difficult.

Moose conservation efforts in this area can only succeed if done in concert and coordination with State conservation efforts. The State closed their antlerless moose hunt years ago due to indications at the time of a population decline and less than ideal population demographics. Eliminating the harvest of cow moose is an important first step in any conservation effort. Current information on the moose population numbers and trends are not available to evaluate if the population has more recently stabilized or if additional conservation measures are necessary for the conservation of moose in Unit 22D remainder. In addition to needing current population data, accurate information on where harvesting occurs in the sub-unit, and by whom, would help to evaluate the effects of a closure on local and non-local hunters. Additionally, due to the predominance of State managed lands in the sub-unit, a closure of the limited BLM managed lands is unlikely to provide more moose for Federally qualified subsistence users and may instead shift non-local harvest to State managed lands.