

**FEDERAL WILDLIFE CLOSURE REVIEW  
WCR12-05**

**Closure Location:** Unit 9C— that portion draining into the Naknek River from the south.

**Current Federal Regulation**

**Unit 9C—Moose**

*Unit 9C — that portion draining into the Naknek River from the south — 1 bull*      *Aug. 20 – Sept. 20  
Dec. 1 – Dec. 31*

*A State registration permit is required during the Aug. 20 – Sept. 20 season.*

*Or*

*A Federal registration permit is required during the Dec. 1 – Dec. 31 season.*

*Federal public lands are closed during Dec. for the hunting of moose, except by rural Alaska residents of Units 9A, 9B, 9C, and 9E, hunting under these regulations.*

**Closure Dates:** Dec. 1– Dec. 31

**Current State Regulation**

<b>Species and Bag limits — Moose</b>	<b>Permit/Ticket Required</b>	<b>Open Season</b>
<i>Unit 9C, that portion draining into the Naknek River</i>	<i>RM272</i>	<i>Sept. 1 – Sept. 15</i>
		<i>Or</i>
	<i>RM272</i>	<i>Dec. 1 – Dec. 31</i>
<b>Residents:</b> <i>One bull by permit in person in King Salmon beginning Aug. 15</i>		
<i>Or</i>		
<i>One antlered bull by permit in person in King Salmon beginning Nov. 14</i>		
<b>Nonresidents:</b> <i>One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side by permit in person in King Salmon beginning Aug. 15</i>	<i>RM282</i>	<i>Sept. 5 – Sept. 15</i>

*Unit 9C remainder*

**Residents:** One bull by permit available in person in King Salmon beginning Aug. 15 RM272

Sept. 1 – Sept. 15

Or

One antlered bull by permit available in person in King Salmon beginning Nov. 29

Or

Dec. 15 – Jan. 15

**Nonresidents:** One bull with 50 — inch antlers or antlers with 3 or more brow tines on at least one side by permit available in person in King Salmon beginning Aug. 15 RM282

Sept. 5 – Sept. 15

### **Regulatory Year Initiated**

In 1992, the Federal Subsistence Board (Board) adopted regulations which closed Federal public lands of Unit 9C, that portion draining into the Naknek River from the south, during December, except to rural Alaska residents of Units 9A, 9B, 9C, and 9E.

### **Regulatory History**

Proposal 45 (1992) — submitted by ADF&G and later adopted with modification by the Board, initiated the December closure. Proposal 45 was modified by the Board to require a Federal registration permit for the December hunt (Dec. 1–Dec. 31) on Federal public lands. Federal public lands draining from the south into the Naknek River drainage were closed to non-Federally qualified users to provide the best protection for the moose population.

Proposal 30 (1995) — established an early August Federal subsistence season (Aug. 20 – Aug. 31) for Unit 9C.

WP06-24 — submitted by ADF&G and later adopted with modification by the Board, eliminated the hunting of antlerless moose during the December season. The Federal registration permit requirement was retained for both the fall and December hunts as the permits provided valuable moose harvest information. The quota of 5 antlerless moose was eliminated.

WP10-45 — submitted by the Bristol Bay Subsistence Regional Advisory Council was deferred in 2010, and was adopted with modification by the Board at its January 2012 meeting. The proposal required a State registration permit to harvest moose in Unit 9 and added an additional 5 days to the fall seasons in Units 9B, 9C, and 9E. This proposal was consistent with the Unit 9 Moose Working Group recommendations.

**Closure Last Reviewed:** 2008 — WCR08-05

### **Justification for the Original Closure ( ANILCA Section 815(3) criteria)**

Section §815(3) of ANILCA states:

*Nothing in this title shall be construed as — (3) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands (other than national parks and monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons*

*set forth in 816, to continue subsistence uses of such populations, or pursuant to other applicable law*

In 1992, Proposal 45 was adopted with modification based on conservation concerns for the moose population in Unit 9. There was a question as to whether this population could withstand a cow harvest. In order to protect the herd and provide a priority for subsistence users, a bull-only harvest was initiated and Federal public lands in the Naknek River drainage from the south were closed to non-Federally qualified harvest of moose (this was the justification used by the Interagency Staff Committee in support of a modified Proposal 45, and supported by the Board) (FWS 1992).

### **Council Recommendation for the Original Closure**

The Bristol Bay Subsistence Regional Advisory Council (Council) stated that, although local residents would desire an antlerless moose season as in the past, it is questionable whether this population could sustain a cow harvest. ADF&G and USFWS were in conflict as to the status of the Big Creek drainage population; however, cow harvest had been closed by Emergency Order during the 1990 and 1991 antlerless moose seasons. In order to protect the herd and provide a priority to subsistence users, the Council believed that a bull-only harvest should be allowed and that Federal public lands draining into the Naknek River from the south should be closed to non-Federally qualified users. The result would be a greater number of bulls available for subsistence users and a larger cow base for herd expansion in the future.

### **State Recommendation for the Original Closure**

The State recommended that the Naknek River drainage be closed to the taking of antlerless moose during the State's December season. Their recommendation was based on their concern for the population of moose north of the Naknek River in the King Salmon Creek drainage. The original recommendation for closure from the State was presented in Proposal 46 of the same year, but was addressed in Proposal 45.

### **Biological Background**

Moose population objectives for Unit 9 are to:

1. Maintain existing densities in areas with moderate (0.5 – 1.5 moose/mi<sup>2</sup>) or high (1.5 – 2.5 moose/mi<sup>2</sup>) densities.
2. Increase low-density populations (where habitat conditions are not limiting) to 0.5 moose/mi<sup>2</sup>.
3. Maintain sex ratios of at least 25 bulls:100 cows in medium to high-density populations and at least 40 bulls:100 cows in low-density areas (Butler 2010).

The current moose populations in Unit 9 are considered stable albeit at low density (Butler 2010). Moose population estimates by subunits are: Unit 9A, approximately 300 moose; Unit 9B, approximately 2,000 moose; Unit 9C outside of Katmai National Park, approximately 800 moose; Unit 9D approximately 400, and Unit 9E approximately 2,500 (Butler 2010).

The most recent surveys in Unit 9C were in 2011 and showed a lower bull:cow ratio (27 bulls:100 cows) than had been observed during previous surveys in the subunit. Calf:cow ratios ranged from 6.5:100 in the Branch River to 17.6 in the King Salmon Creek area. The combined calf:cow ratio observed in Unit 9C of 9 calves:100 cows is lower than ratios observed during the five previous surveys (Riley 2012).

The bull:cow ratio is above the management objectives in Unit 9C and appears to be increasing after several years of improved recruitment. Bull harvest does not appear to be limiting the population at this time, even though the population remains at a low density. Although the calf:cow ratio was lower in 2008 than in 2005 and 2007, it was still within the normal range for Unit 9C over the last 25 years (Butler 2010).

Predation by brown bears on newborn moose calves and illegal harvest in some areas are thought to be the major factors limiting the moose population in Unit 9. However, reduction in predation rates could only be achieved by a substantial reduction in bear densities, which would most likely be opposed by a large segment of the public (Butler 2010). Reducing illegal harvest would only occur with wide support and active involvement from local communities (Butler 2010).

### Harvest History

Federal subsistence registration permits are required for the fall and winter moose hunts within Unit 9C — that portion draining into the Naknek River from the south. Previously, the quota for the winter hunt was set at five antlerless moose, but the quota was eliminated and harvest was changed to bulls only in 2006. Between 2000 and 2010, a total of 67 moose were reported harvested by Federal permit. Total harvest under both State and Federal regulations has not exceeded 4 animals/year since 2005 and there has been no Federal harvest in the area since 2007 (**Table 1**).

### OSM Preliminary Recommendation:

- maintain status quo  
 initiate proposal to modify or eliminate the closure  
 other recommendation

**Table 1.** State and Federal moose harvest in Unit 9C— that portion draining into the Naknek River from the south, 2000–2010 (Riley 2012, pers. comm.)

Regulatory Year	State Harvest	Federal Harvest
2000	4	0
2001	7	0
2002	10	4
2003	8	0
2004	6	5
2005	8	0
2006	2	0
2007	1	2
2008	2	0
2009	4	0
2010	4	0

### Justification

In 2006, the Federal Subsistence Board adopted proposal WP06-24, which eliminated the antlerless moose harvest in this area, thus implementing conservation measures to help increase the moose population and eventually provide improved hunting opportunity for Federally qualified subsistence

users. In the six years since this proposal was passed, moose populations continue to be low, and harvests are also low.

The fall and winter hunts for Federally qualified subsistence users provide opportunities to harvest moose in Unit 9C — the portion that drains into the Naknek River from the south. The status quo is necessary to continue subsistence uses under Section 804 of ANILCA and does not violate the prohibition of ANILCA Section 815(3). Maintaining the status quo is consistent with sound management principles and the conservation of healthy wildlife populations.

## **LITERATURE CITED**

Butler, L. 2010. Unit 9 moose management report. Pages 116–123 *in* P. Harper, editor. Moose management report of survey and inventory activities 1 July 2007–30 June 2009. Alaska Department of Fish and Game. Project 1.0. Juneau.

FWS. 1992. Staff Analysis Proposal 45. Pages 200–201 *in* Federal Subsistence Board Meeting Materials April 6–10, 1992. Office of Subsistence Management, FWS. Anchorage, AK. 966 pages.

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