



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Yukon Delta National Wildlife Refuge  
P.O. Box 346  
Bethel, Alaska 99559

January 6, 2014

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115562  
Juneau, AK 99811-5526

The Yukon Delta National Wildlife Refuge (Refuge) would like to comment on **Proposals 2, 3, and 4** in regards to moose within the Unit 18 Remainder area.

The Refuge supports further liberalization of the moose hunting regulations in Unit 18 Remainder; the regulations for the Unit 18 Remainder area should be similar to that of the Lowest Yukon area's bag limit of 2-moose. Survey data have indicated a rapidly growing moose population for the Yukon area in Unit 18 (Table 1). Based on the latest survey data, there are 2,827 moose in the Lower Yukon Area and 8,346 moose in the adjacent Unit 18 Remainder area (Unit 18 Remainder consists of the Andreafsky and Paimiut survey areas). In addition, based on a composition ratio of 70 calves:100 cows from November 2011 Paimiut surveys, rapid population growth in Unit 18 Remainder will likely continue at least in the near-future.

Table 1. Moose population estimates within Unit 18.

Census Area	Year	Estimated Number of Moose	Density (mi <sup>2</sup> )
Lowest Yukon	1988	0	NA
	1992	28	0.02
	1994	65	0.04
	2002	674	0.59
	2005	1,342	1.12
	2008	2,827	2.37
Andreafsky	1995	52	0.04
	1999	524	0.23
	2002	418	0.26
	2012	2,748	1.72
Paimiut	1992	994	0.64
	1998	2,024	1.3
	2002	2,382	1.52
	2006	3,614	2.3
	2013	5,598	3.56



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We make the following arguments to further liberalize the Unit 18 Remainder area for a 2-moose bag limit:

- Based on the rapid population growth rate, we have concern that the population will continue to grow despite hunting pressure and eventually lead to over-utilized habitat followed by a sharp decline.
- There were similar concerns over the rapid population growth within the Lower Yukon area which led to a 2-moose bag limit. Based on the most current data, the Unit 18 Remainder area has almost three times the number of moose as the Lower Yukon area. Therefore, there is more justification to liberalize the Unit 18 Remainder area now than there was for the Lower Yukon area in the past.
- Increased opportunity can be gained by hunters, opportunity that cannot be recovered once a population declines due to over-utilization of habitat. Currently the biology supports an increased opportunity, making the current regulations unnecessarily restrictive for hunters.
- The boundary between Unit 18 Remainder and the Lower Yukon areas was created to conserve moose within the Lower Yukon area during the moratorium. That boundary is not needed anymore to conserve moose due to the high populations. Managing both areas with similar regulations would make enforcement and management easier.

The moose population issue within the Yukon area of Unit 18 is a good “problem” to have. We are in a unique situation where we can biologically support an exceptionally liberal moose season. As we have seen in the past elsewhere in Alaska, a rapid increase in a moose population is followed by a rapid decrease due to over-utilization of habitat. We hope to be able to allow hunters to make the most of this unique situation while we can afford this opportunity.

Thank you for your consideration.

*Patrick Snow*

Patrick Snow, Acting Refuge Manager