



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION  
Central/Southwest

1800 Glenn Highway, Suite 4  
Palmer, Alaska 99645-6736  
Main: 907.861.2100  
Fax: 907.861.2121

January 21, 2016

An Agenda Change Request (ACR) has been submitted to the Alaska Board of Game requesting to change 5 AAC 85.025 (17) Hunting seasons and bag limits for caribou, Unit 22.

With respect to the board's ACR acceptance criteria:

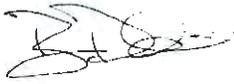
- (A) The department has not identified a conservation concern that is addressed by this proposal.
- (B) The department is unaware of an error in regulation.
- (C) The department is unaware of any unforeseen effects of regulations that should be addressed in a change to a regulation; however we acknowledge that the fall migration in 2015 made large numbers of caribou available to hunters at a time when the bull season was closed.

The fall migration of caribou to the Seward Peninsula has generally been variable and largely unpredictable in both space and time. During October and November (RY15), unusually large numbers of Western Arctic Caribou Herd (WAH) caribou migrated to within 45 miles of Nome, Teller, White Mountain, and Shishmaref. This allowed hunting activities to occur, and after 14 October, hunters targeted cow caribou to be consistent with bag limits published in the 2015-2016 Alaska Hunting Regulations. The unusual distribution and availability of caribou in southern and western migratory areas was in large part responsible for the unforeseen effect of this regulation. With a more 'typical' distribution (i. e. caribou less available), we anticipate harvests of cows during a bull closure would likely have been lower and in alignment with regulatory reductions implemented in RY15. The combined effects of 'caribou distribution close to hunters' and 'bull season closures' are ill-timed when the declining WAH would benefit from a reduced take of cow caribou.

The department agrees that an unexpectedly high number of cow caribou were likely harvested between 15 October – 31 January, when the bull season was closed. If similar access to caribou along the Nome road system in Unit 22 occurs in future years, a conservation concern could develop due to the declining condition of the herd. The WAH peaked at 490,000 caribou in 2003. In 2013 the herd was estimated at 235,000 indicating a ~7% annual rate of decline between 2003 and 2013; the rate increased to an estimated ~15% annually between 2011 and 2013. The 2015 census failed due to poor photography conditions; however, other metrics suggest the herd is currently declining at a reduced rate, estimated at ~7% annually. Prior to RY15 harvests have been estimated at 12,000 caribou per year based on data and patterns available through community harvest assessments. Current year harvests or harvests by sex are not known but the unusual availability of caribou caused a conservation concern that local harvest could

contribute to total cow harvests above the management objective of 2% cow harvest. In Unit 22 the subsistence household survey data indicates sex of caribou harvest is approximately 32% cows and 54% bulls (with 14% of harvested animals of unknown sex), so there is potential for high harvests of cows in the future. Keeping harvest at sustainable levels will be important during a time when the WAH is declining.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Dale", with a stylized flourish at the end.

Bruce Dale, Director  
Division of Wildlife Conservation