

ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS FOR PROPOSALS 3, 5, 15, 20, 23, 25, and 36-38
WESTERN ARCTIC / WESTERN REGION PROPOSALS
ALASKA BOARD OF GAME MEETING
KOTZEBUE, ALASKA
JANUARY 26-29, 2024



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, January 26-29, 2024 in Kotzebue, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

PROPOSAL 3 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Close nonresident caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A.

PROPOSED BY: Western Arctic Caribou Herd Working Group, Vern Cleveland, Chair (EG-F23-209)

WHAT WOULD THE PROPOSAL DO?

Close the nonresident caribou season in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A. This would eliminate all nonresident hunting opportunities for caribou in the Units listed above.

WHAT ARE THE CURRENT REGULATIONS?

Unit 21D Remainder, 22, 23, 24B Remainder, 24C, 24D
Nonresident caribou season:

1 Bull; August 1- September 30
Locking tag and harvest ticket required
Unit 26A

Nonresident caribou season:
1 Bull; July 15-September 30
Locking tag and Harvest ticket required

There is a positive customary and traditional use finding for caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A. As mentioned above, several caribou herds migrate across these units, and positive customary and traditional use findings have been found for each herd. Caribou harvests in these units are subject to the following Amounts Reasonably Necessary for Subsistence (ANS) ranges:

Units 20(F), 21(B), 21(C), 21(D) and 24 (Galena Mountains Herd, Wolf Mountains Herd, Ray Mountains Herd): 150-200

Units 21,22,23,24, and 26 (Western Arctic Herd, Teshekpuk Lake Herd): 8,000-12,000

Units 25(A), 25(B), 25(D), 26(B), and 26(C) (Porcupine Herd): 1,250-1,550

Unit 26(B) (Central Arctic Herd): 250 – 450

The Western Arctic Caribou herd (WAH) has a positive intensive management finding, with a population objective of at least 200,000 caribou and a harvest objective of 12,000-20,000.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would close all nonresident hunting of caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A. If adopted, this proposal may reduce WAH harvest as intended but could have the unintended consequence of limiting hunting opportunity in Units where the WAH is currently not found.

BACKGROUND: Caribou are a highly valued game animal utilized by various groups across the range of the WAH. The WAH ranges across Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A. This herd is currently declining with a population of 164,000 during the 2022 census. An Intensive Management Population Level has been set for the WAH at 200,000. The Board of Game set a combined ANS range for the WAH and Teshekpuk Caribou herds in Units 21, 22, 23, 24 and 26 of 8,000-12,000 animals. The herd has been in decline since the early 2000s when it was close to 500,000. This herd has supported an estimated harvest of 12,000 caribou per year since 1996. However, given changes to WAH distribution in recent years that has limited access to the herd by local users, the department has concluded the model used to develop this estimate is too coarse to track short term change and the use of the model has been discontinued at this time. It is generally understood that harvest rates have decreased due to the reduction in access and abundance to the herd, however the data is too limited to understand the rate of reduction. The recommended harvest rate based on figures presented in Table 2 of the Western Arctic Caribou Herd Working Group (WACHWG) management plan (2019) for the 2022 population of 164,000 animals is ~4.8% or 7,872 animals, which is below the harvest objective and the lower end of the ANS for the WAH.

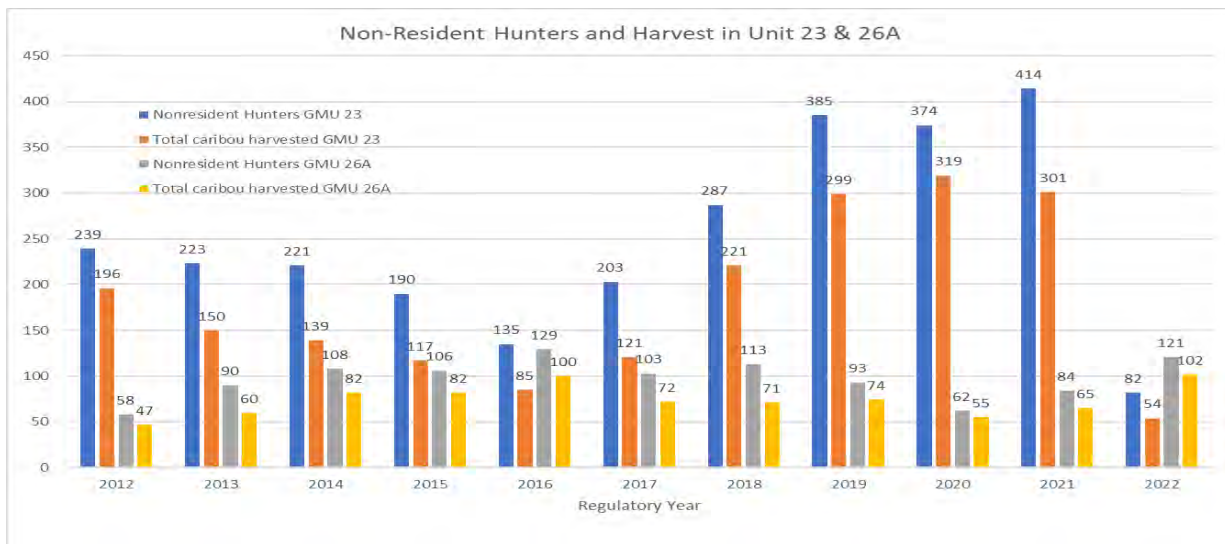


Table 1: Nonresident caribou hunter numbers shown in blue and gray and number of harvested caribou shown in orange and yellow from 2012-2022.

Since 1996 harvest estimates for the WAH indicate that local harvest accounts for approximately 95% of the total harvest with nonresident hunters taking the remaining 5%. Most of the nonresident harvest occurs in Units 23 and 26A. Federal land closures to hunting by Non-Federally Qualified Subsistence Users under WSA21-01 has reduced the area available for nonresident hunters in Unit 23. Annual nonresident harvest averaged 251 caribou and has been comprised of mostly bulls (97.91%), RY2012-2022. Bull:cow ratios remain well above the 30:100 goal set by the Western Arctic Herd Working Group. The limited number of bulls harvested by nonresidents is believed to be biologically insignificant.

Some resident hunters of WAH caribou indicate that competition with nonresident hunters

impedes their ability to access the animals for subsistence, especially in a time of decline. Of specific concern is the presence of aircraft in early in the fall and the possible impacts on herd movements observed by area hunters.

DEPARTMENT COMMENTS: The department is **NEUTRAL** due to its allocative nature. Although there are reasons to reduce harvest of the WAH, the limited number of bulls harvested by nonresidents is believed to be biologically insignificant and the department is generally opposed to unnecessary reductions in hunting opportunity that is not biologically driven. Considering the harvestable surplus and the ANS range, the board may wish to evaluate whether or not it can provide for all consumptive uses.

The department asks to defer the decision on Units 24B remainder, 24C, and 24D until the Interior & Eastern Arctic Region meeting in March 2024.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 5 – 5 AAC 85.025. Caribou hunting seasons and bag limits. Reduce the bag limit for caribou for RC907 resident hunters in Units 23 and 26A, and change the nonresident hunt to a registration permit with additional restrictions,

PROPOSED BY: Gary Colbath

WHAT WOULD THE PROPOSAL DO? The proposal would change the RC907 permit from five caribou per day to five caribou annually only one of which may be a cow for resident hunters. The proposal would also establish a registration permit for nonresident hunters in Units 23 & 26 with a quota to be determined by ADF&G but not less than 400 bulls.

WHAT ARE THE CURRENT REGULATIONS?

Unit 23

Resident Hunting Season

Five caribou per day, by registration permit only (RC907); however, calves may not be taken.

Bulls: no closed season

Cows: July 15 – Apr 30

(Sept 1 – Mar 31 in 23 Remainder)

Nonresident Hunting Season

One Bull Aug 1 – Sept 30

Unit 26A

Resident Hunting Season

Five caribou per day, by registration permit only (RC907); however, calves may not be taken.

Bulls: July 1 – Oct 14, Feb 1 – June 30

Cows: July 15 – Apr 30

Nonresident Hunting Season

One Bull July 15 – Sept 30

Unit 26 Remainder

Resident Hunting Season (RC907 permit)

Jan1- Mar 15: Five caribou per day (three of which may be cows)

Mar 16 - July 15: Five bulls per day

July 16 - October 15: Five caribou per day (three of which may be cows; cows with calves may not be taken)

Oct 16 – Dec 31: Three cows per day

Nonresident Hunting Season

One Bull July 15 – Sept 30

There is a positive customary and traditional use finding for caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A. Several caribou herds migrate across these units, and positive customary and traditional use findings have been found for each herd. The board adopted the following Amounts Reasonably Necessary for Subsistence (ANS) ranges by herd:

Units 20(F), 21(B), 21(C), 21(D) and 24 (Galena Mountains Herd, Wolf Mountains Herd, Ray Mountains Herd): 150-200

Units 21,22,23,24, and 26 (Western Arctic Herd, Teshekpuk Lake Herd): 8,000-12,000

Units 25(A), 25(B), 25(D), 26(B), and 26(C) (Porcupine Herd): 1,250-1,550

Unit 26(B) (Central Arctic Herd): 250 – 450

The Western Arctic Caribou herd (WAH) has a positive intensive management finding, with a population objective of at least 200,000 caribou and a harvest objective of 12,000-20,000.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted, it would reduce the bag limit for resident hunters in the RC907 permits in Units 23 and 26A and establish a nonresident registration permit with a quota to be determined by the department with a minimum of at least 400 bulls instead of the current harvest ticket. Effectively, the proposal would reduce subsistence opportunity while potentially increasing nonresident opportunity.

BACKGROUND: The Western Arctic Caribou Herd is currently experiencing a long-term decline which started in 2003 and has resulted in a population level decrease from approximately 490,000 in 2003 to 164,000 in 2022. While caribou populations are known to fluctuate naturally based on a variety of environmental factors, this decline is of significant concern due to the importance of caribou to various user groups. The home range of the WAH covers approximately 157,000 square miles and caribou are generally considered the primary terrestrial food source for many communities within that range (WACHWG 2022).

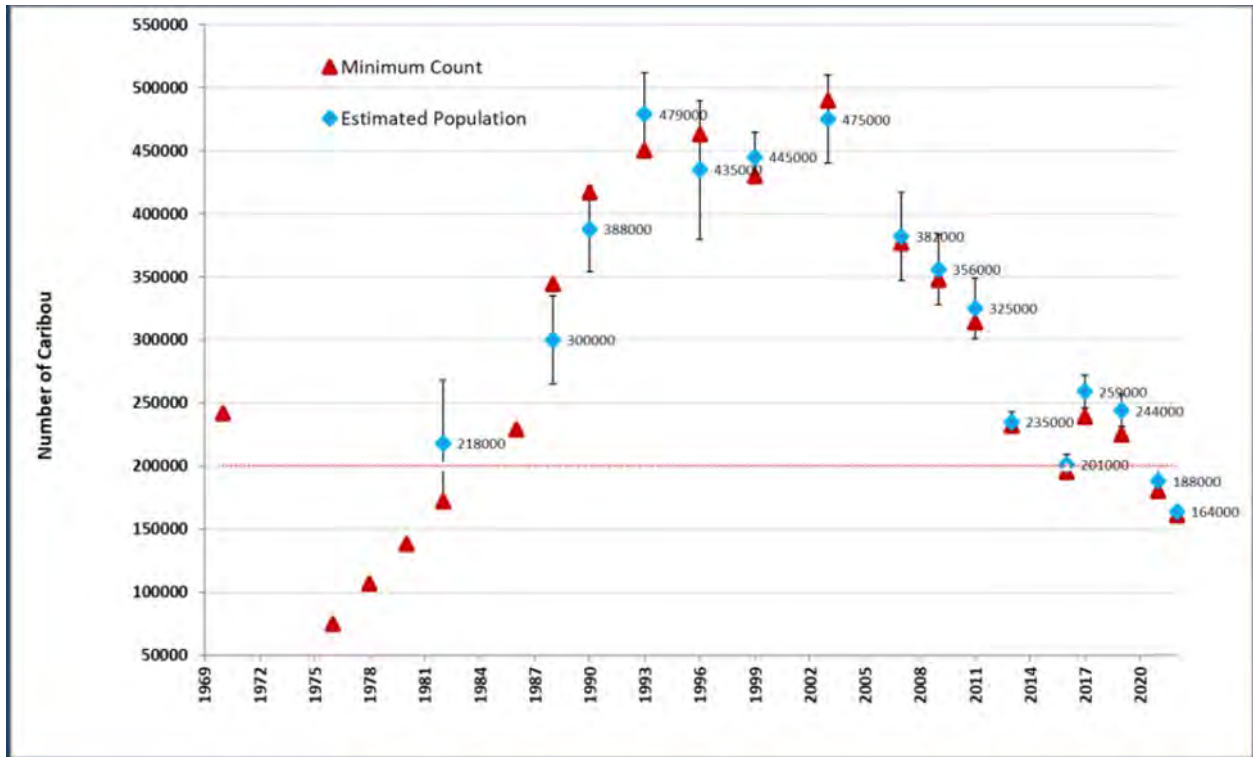


Figure 1. Western Arctic Caribou Herd population estimate 1970-2022. Minimum counts are indicated in red and estimated abundance is indicated with a blue diamond along with associated 95% confidence limits. Estimates are produced using an estimator described by Rivest et al (1998).

The importance of caribou conservation to local users was demonstrated by the Kotzebue Advisory Committee (AC) during a 2022 fall/winter meeting where they drafted a proposal to reduce the resident bag limit to 4 caribou per year, of which only 1 may be a cow and applied it to Unit 23 only. The Western Arctic Caribou Herd Working Group (WACHWG) followed suit a few weeks later during their December meeting. Drafting a similar proposal, the working group unanimously voted to use the same bag limit proposed by the Kotzebue AC but opted to include the entirety of the WAH range. The WACHWG is made up of various stakeholders including subsistence users from communities within the WAH range, hunters from outside the range of the herd, conservationists, hunting guides, reindeer herders and transporters. The combined proposals, (WSA22-05 and 06) coming from the North West Arctic and Western Interior Subsistence Regional Advisory Committees show continued local support and understanding of the need for harvest reduction. The department recognizes and fully supports the readiness of these groups to reduce harvest and promote conservation of the WAH.

Harvest of the WAH is difficult to determine with limited harvest reporting across a wide geographic area. The department conservatively estimates that around 10% of the actual harvest is reported. Recent attempts to increase reporting have included the establishment of registration hunts (RC800 and RC907) and outreach efforts focused on the need for harvest data. To fill in this data gap the department previously used a model to determine harvest by using subsistence household surveys, and the local availability (distance, weather, etc.) to determine the harvest level locally. This model has produced an average annual harvest of approximately 12,000 animals (Dau 2015). However, given changes to WAH distribution in recent years limiting access to the herd by local users, the department has concluded the model is too coarse to track short term change and the use of the model has been discontinued at this time. It is generally understood that harvest rates have decreased due to reduction in access, however the information is too limited to understand the rate of reduction. The recommended harvest rate, based on figures presented in Table 2 of the WACHWG management plan (2019) for the 2022 population of 164,000 animals, is ~4.8% or 7,872 animals. This estimate of harvestable surplus is far below the long-term estimated average harvest for this herd and continued efforts to understand actual harvest are ongoing.

Reducing this harvest, particularly cow harvest, is an important step to slowing population decline. Estimated cow mortality is an important population metric and has remained above the long-term estimated average since 2018. The change from 5 caribou per day to 5 per year only one of which may be a cow represents a significant reduction in harvest with an emphasis on a reduction in cow harvest.

The nonresident harvest on the WAH has historically represented around 5% of total estimated harvest. Reporting of nonresident harvest of the WAH is nearly 100%. Most nonresident harvest occurring within Units 23 & 26A due to the current movements of the WAH. Federal land closures to hunting by Non-Federally Qualified Subsistence Users under WSA21-01 has reduced the area available for nonresident hunters in Unit 23. Annual nonresident harvest averaged 256 caribou of which 97.91% were bulls (2012-2022). Bull:cow ratios remain well above the 30:100 goal set by the Western Artic Herd Working Group. Bull:cow ratios have been above 38:100 since 2001 and the most recent survey resulted in 47:100 in 2021. The highest harvest of caribou by nonresidents since 2012 occurred in 2021 with a total harvest of 374 caribou. This level of harvest still falls below the quota of at least 400 bulls in the proposal.

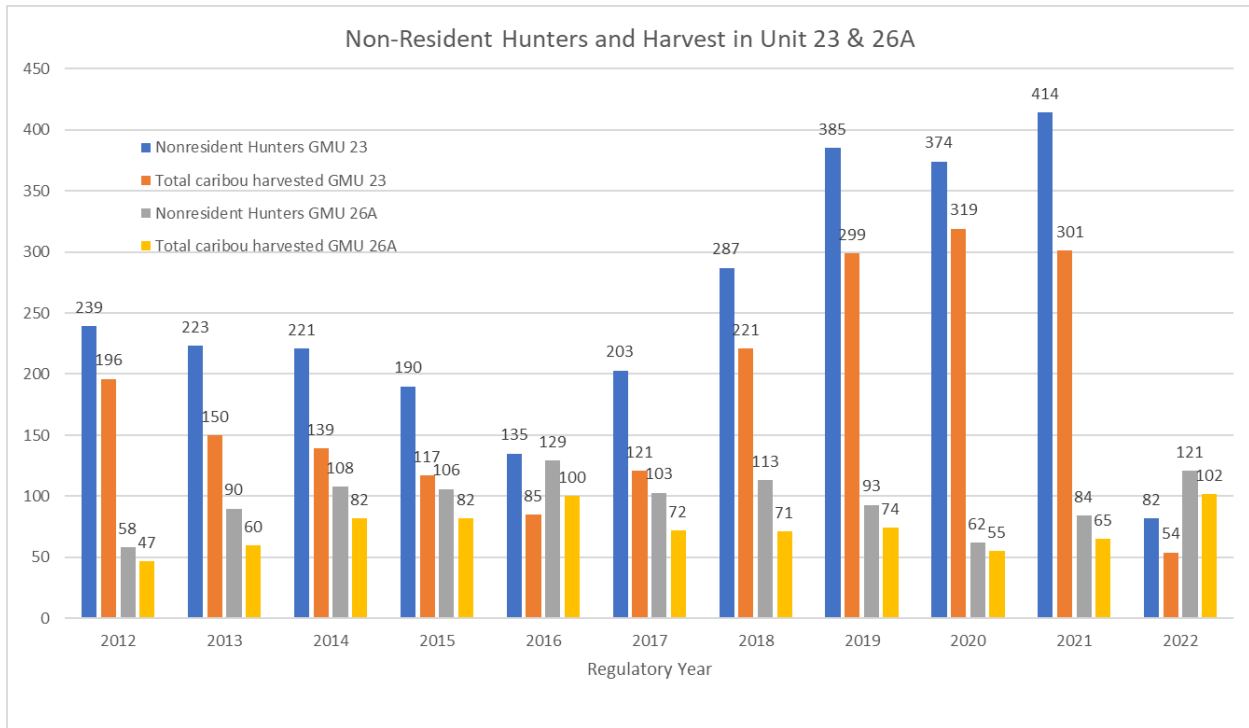


Figure 2: Nonresident hunters and harvest Unit 23 & 26A 2012-2022. The number of hunters in Unit 23 are shown in blue and in grey for Unit 26A. Total caribou harvest is shown in orange for Unit 23 and yellow for Unit 26A.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal for units 22 and 23 and recommends an amendment to retain existing Unit 26A seasons and bag limits due to the stable populations of the other herds in Unit 26A. Because many hunters in Unit 26A harvest caribou from the Teshekpuk Caribou herd as well as the Central Arctic herd in Unit 26A, a modification is needed to address that difference.

Reducing harvest, especially cow harvest, is one variable that can be controlled to help manage the herd while the WAH is in decline. The nonresident quota of at least 400 bulls recommended by this proposal is unlikely to affect nonresident harvest. Nonresident harvest reporting in the region is very good and allows the department to monitor the harvest appropriately.

The change in bag limit for resident hunting from 5 caribou per day to 5 per year, where only one can be a cow, is a significant reduction to subsistence opportunity. If adopted, the board may wish to consider whether reasonable opportunity for subsistence would still be provided under the proposed regulatory structure. Specifically, the board may wish to consider how the proposed regulations would impact the customary and traditional harvest and use patterns for caribou of many subsistence users and whether nonsubsistence uses should still be provided at this level of conservation need.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 15 - 5 AAC 85.050(a)(1). Hunting seasons and bag limits for muskox. 5 AAC 92.019. Taking of big game for certain religious ceremonies. Allow the subsistence take of muskox in a portion of Unit 18.

PROPOSED BY: David Carl

WHAT WOULD THE PROPOSAL DO? Under 5 AAC 85.050 it would open a muskox hunting season. Under 5 AAC 92.019(B) it would allow the take of muskox for ceremonial harvest on the mainland of unit 18.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.019. Taking of big game for certain religious ceremonies. (a) The hunting and taking of game species having a positive finding in 5 AAC 99.025, outside the seasons or bag limits established in 5 AAC 85, for use in this state as food in customary and traditional Alaska Native funerary or mortuary religious ceremonies within 12 months preceding the ceremony is authorized if consistent with sustained yield principles.

(b) The department shall publicize a list of game populations and areas, if any, for which the taking of game is inconsistent with sustained yield principles. It is the hunter's responsibility to contact the department to find out which game populations and areas are excluded from taking under this regulation.

5 AAC 85.050(a)(1). Hunting seasons and bag limits for muskox.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1) Remainder of Unit 18	No open season	No open season

There is a negative customary and traditional use (C&T) finding for muskoxen in Unit 18.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A hunt would be established for muskoxen in unit 18 mainland. This proposal also requests to be able to take muskox in certain religious ceremonies.

BACKGROUND: The take of muskox in mainland Unit 18 has been inconsistent with sustained yield, and as a result they cannot currently be taken under 5 AAC 92.019.

A small population of muskox inhabit the mainland of Unit 18. Currently there is no open season and no hunting for these animals. In 2019, a minimum count survey of Unit 18 mainland muskox found 174 animals. The department would like to delay opening a hunt for this population until there are a minimum of 300 animals, as noted in the species management plan, which is consistent with other herds in Alaska.

Through observations it would appear animals in this population move around a lot and sometimes cover great distances making it appear that there are more animals than there really are. More information about their movement patterns and establishing where their core areas would be valuable before opening a hunt. In this regard, the department is seeking research funding to better understand and study this population. If funded, the project would deploy GPS collars on muskox cows within the southwest Alaska mainland population to monitor the movements of the animals. This data will then be used to determine individual and population home ranges, which in turn can be used to develop hunt structures and boundaries. Further, these collars will be used to help managers refine abundance survey methods over this large study area, allowing the managers to obtain more accurate levels of abundance and save time and money.

In 1988, the board made a negative C&T finding for muskoxen in unit 18. At the meeting in 2014, the board again considered a C&T finding for muskoxen populations on Nunivak and Nelson islands. The board took no action at the request of the proponent, and so the negative finding in place for all of Unit 18 remained in regulation.

DEPARTMENT COMMENTS: The department is **OPPOSED** to opening a hunt for muskoxen at this time because it has biological concerns for muskoxen in mainland Unit 18. Once there are enough animals to allow harvest consistent with sustained yield, muskox in Unit 18 remainder will be removed from the list in 5 AAC 92.019(b), which will allow them to be taken for religious ceremonies. The department has previously required a minimum of 200-250 muskoxen within a population before it has considered opening a hunt in any of the currently hunted muskox populations. In more recent years, that minimum requirement has been raised to 300 muskoxen in the small, slow-growing populations. Harvest rates for most muskox populations are set between 1 – 2% of the overall population estimate, resulting in only 3 – 6 muskoxen available for harvest once the minimum threshold of 300 animals has been reached. Furthermore, as a herd animal, muskoxen are susceptible to random, large mortality events that can abruptly change the trajectory of a population and/or remove all extra animals available for harvest at the current population level. Therefore, the department would like to delay opening a hunt for this population until there are a minimum of 300 animals.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 20 – 5 AAC 85.050. Hunting seasons and bag limits for muskox. Change the bag limit for Tier II muskox hunts in Unit 22 to “One muskox every two years”.

PROPOSED BY: Jacob Mannix

WHAT WOULD THE PROPOSAL DO? The adoption of this proposal would allow hunters to only harvest a muskox in Unit 22 every two years rather than every year.

WHAT ARE THE CURRENT REGULATIONS? Muskox hunting in Unit 22 is currently managed under a Tier II system. The bag limit for hunts in Units 22A, 22B, 22D, and 22E is currently managed as an “Any Bull” bag limit, while the hunts in Unit 22C were changed using discretionary permit authority in RY23 to have an “Any Muskox” bag limit.

5 AAC 92.062 limits the number of Tier II muskox permits that can be issued per household to one. 5 AAC 92.062 also requires that Tier II subsistence hunting permits be issued to the highest ranking applicants, based upon the applicant’s customary and direct dependence on the game population and based upon the ability of a subsistence user to obtain food if subsistence use is restricted or eliminated, as determined by scoring in 5 AAC 92.070.

There is a positive customary and traditional use finding for muskox in Unit 22 and in Unit 23 south and west of the Kobuk River drainage, with an amount Reasonably Necessary for Subsistence uses (ANS) of 100-150 animals, including 10-25 in Unit 22E (5 AAC 99.025(9)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, there would be no change in the harvest of muskox or season for muskox hunting. This proposal has the potential to create turnover in the current Tier II muskox permit allocations for Unit 22 and allow some individuals to hunt for muskox that normally would not receive a permit, as the current harvestable surplus means a small number of permits are available. This could provide opportunity to hunters that would not currently receive a Tier II permit.

BACKGROUND: The Seward Peninsula Muskox Population (SPMP) was reintroduced in 1970 and experienced dramatic growth until the population peaked at 2,903 muskoxen in 2010. The SPMP declined 12.5% annually between 2010–2012 and has remained stable since 2012. The last population survey was completed in 2021 and estimated 2,071 muskoxen (95% CI: 1689-2562). Concerns regarding the role of mature bulls in affecting population growth and the potential overharvest of those bulls led to the current management strategy of maintaining a minimum of 40 mature bulls per 100 cows beginning in RY2012. The harvestable surplus of the SPMP has remained below the ANS of 100–150 muskoxen since the change in harvest rates; consequently, the muskox hunt has been managed as a Tier II hunt in most Unit 22 subunits since RY2012. The current harvestable surplus of muskoxen in the SPMP is approximately 60–70 muskoxen. This pre-season harvest rate of 3.5% was implemented with the intent to increase the number of mature bulls in the population and achieve management objectives. The last composition survey completed in 2021 estimated 38 mature bulls:100 cows.

Throughout the Tier II muskox hunts administered in Unit 22 during RY12-RY22, an average of 41 state permits are issued annually with additional 8–12 permits issued through the federal system. Permit issuance varies with 1–11 permits available in each subunit annually. There is substantially more demand for Tier II permits than what is available; of the 300 muskox permits issued in Unit 22 during RY12-RY22, there were 3,777 applications received for an award rate of 8%. The 300 awarded permits have gone to 124 households since RY12, indicating that 41%

of the awarded permits have gone to single households multiple years, with some (4%, $n=5$) households receiving as many as 9 of the 11 years of available Tier II permits in Unit 22.

The department receives numerous comments each year from Nome residents and Norton Sound Advisory Committee members regarding Tier II permit issuance. They believe the current scoring system unnecessarily restricts permits to the same small pool of hunters that can claim the maximum number of years allowable and discriminates against other subsistence users.

DEPARTMENT COMMENTS: The department is **NEUTRAL** with regards to this proposal because it is allocative. Harvest would not increase if this proposal were adopted because a change to the bag limit would not change the number of permits issued annually. As written, permit holders that harvest a muskox under the proposed one muskox every two-year bag limit would not be able to harvest a muskox the following year in the Unit 22 Tier II hunts, however they would be eligible for a permit because this proposal does not address permit issuance. Nothing in the proposal would prevent a person from being awarded the Tier II hunt two years in a row, however it would prevent a person from harvesting a muskox two years in a row.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 23 – 5 AAC 99.025. Customary and traditional uses of game populations.

Revisit the Amount Reasonably Necessary for subsistence uses for moose in Unit 22.

PROPOSED BY: Kawerak, Inc, Melanie Bahnke President

WHAT WOULD THE PROPOSAL DO? This proposal asks the Board of Game to reconsider ANS findings for moose in Unit 22 and whether a reasonable opportunity is being provided to meet the existing ANS given the current regulatory structure and subsistence needs for moose in the area.

WHAT ARE THE CURRENT REGULATIONS? Currently the moose hunting regulations for Unit 22 include the following hunt opportunities for residents and nonresidents:

5 AAC 85.045 – Unit 22A, that portion north of the Egavik drainage:

- August 1 – September 30
 - Residents – 1 bull
- September 1 – September 20
 - Nonresidents – 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side

5 AAC 85.045 – Unit 22A, that portion in the Unalakleet River drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage:

- September 1 – September 30
 - Residents – One bull by registration permit only; or
- December 1 – January 31 (Season to be announced)
 - Residents – 1 antlered bull by registration permit only; during the period Dec 1 – December 31, a season may be announced by emergency order.
- Nonresidents – no open season

5 AAC 85.045 – Unit 22A, Remainder:

- August 1 – September 30
 - Residents – One bull; or
- January 1 – January 31
 - Residents – 1 antlered bull
- September 1 – September 30
 - Nonresidents – 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side

5 AAC 85.045 – Unit 22B, East, that portion east of the Darby Mountains, and including the drainages of the Kwiniuk, Tubutulik, Koyuk and Inglutalik Rivers:

- August 1 – September 30
 - Residents – One bull, or;
- November 1 – December 31
 - Residents – 1 antlered bull
- November 1 – December 31
 - Nonresidents – 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 10 permits may be issued

5 AAC 85.045 – Unit 22B, Remainder:

- September 1 – September 14
 - Residents – One bull by registration permit only; or
- January 1 – January 31
 - Residents – 1 antlered bull by registration permit only
- Nonresidents – no open season

5 AAC 85.045 – Unit 22C:

- September 1 – September 14
 - Residents – One bull by registration permit only; or
- January 1 – January 31 (To be announced)
 - Residents – 1 antlered bull by registration permit only; during the period January 1 – January 31, a season may be announced by emergency order
- September 1 – September 14
 - Nonresidents – 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by registration permit only

5 AAC 85.045 – Unit 22D, that portion within the Kougarok, Kuzitrin, and Pilgrim River drainages

- September 1 – September 14
 - Residents – One bull by registration permit only; or
- January 1 – January 31 (To be announced)
 - Residents – 1 antlered bull by registration permit only; during the period January 1– January 31, a season may be announced by emergency order
- Nonresidents – No open season

5 AAC 85.045 – Unit 22D, Southwest, that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the unit boundary opposite the headwaters of McAdam’s Creek to its confluence with Canyon Creek, and west of the west banks of Canyon Creek to its confluence with Tusuk Channel

- September 1 – September 14
 - Residents – One bull by registration permit only; or
- January 1 – January 31 (To be announced)
 - Residents – 1 antlered bull by registration permit only; during the period January 1 – January 31, a season may be announced by emergency order
- Nonresidents – No open season

5 AAC 85.045 – Unit 22D, remainder:

- August 10 – September 14; December 1 – January 31 (Season to be announced)
 - Residents – 1 bull by registration permit only; only antlered bull moose may be taken from December 1 – January 31
- Nonresidents – No open season

5 AAC 85.045 – Unit 22E, remainder:

- August 10 – September 14;
 - Residents – 1 bull; or

- January 1 – March 15
 - Residents – 1 antlered bull
- September 1 – September 14
 - Nonresidents – 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 25 permits may be issued

There is a positive customary and traditional use finding for moose in Unit 22 with an Amount Reasonably Necessary for Subsistence of 250-300 moose.

The Board of Game has identified moose in Unit 22 as qualifying for intensive management due to their importance for providing high levels of harvest for human consumptive use (5 AAC 92.108). The population objective for Unit 22 is 5,100-6,800 animals with a harvest objective of 300-680 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted, the Board of Game would review updated harvest and use information for moose in Unit 22 and evaluate whether the current ANS range reflects the harvest history of subsistence use, and as such, still provides reasonable opportunity for the subsistence harvest of moose. Depending on the board’s decision, ANS numbers may be modified and further regulatory change may be discussed.

BACKGROUND: Moose population estimates in Unit 22 are obtained annually through aerial surveys using Adaptive Cluster Sampling (ACS) methodology. The moose population in Unit 22 is currently estimated to be 6,676 moose as of 2023 and is within the Intensive Management Population Objective of 5,100 – 6,800 moose set by the Board of Game in 2001. The harvest objective was set in 2001 at 300 - 680 moose and the harvestable surplus for moose in Unit 22 was last estimated to be 349 moose based on 2023 population estimates. The harvestable surplus is higher than the upper bound of the ANS for Unit 22.

Hunt structures in Unit 22 are managed as general seasons, registration permits, and draw permits with varying seasons, quotas, and bag limits depending on the population data for specific moose management units within Unit 22. Although significant public input has shaped the current hunt structure in Unit 22, some resident hunters have expressed concerns about hunting in portions of Unit 22, particularly in Unit 22C where the quota has been met and emergency orders issued to close the season within two days of opening since RY2012. Season closures by emergency orders result in extremely short seasons that challenge some hunters’ opportunity to harvest a moose, especially in Unit 22C.

The proponent expresses concern that the current ANS does not reflect growth in the human population of Nome over the last 20 years and notes that “...local subsistence moose hunters are not being allotted a reasonable amount of time to harvest moose when quite often the moose hunt is closed the very next day after opening...”. The ANS is one metric by which the board can

determine whether reasonable opportunity is being provided in a subsistence hunt. Other factors, such as bag limits, methods and means, and season length, also speak to reasonable opportunity.

The long-term annual average harvest in all of Unit 22 from 2010 to 2022 is 190 moose (range 171 - 243) for residents and nonresidents combined. Resident-only harvest is 163 moose annually (range 130 - 211), while non-resident harvest is 22 moose annually (range 9 - 33).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative. The board may wish to consider whether the regulatory structure for moose hunting in GMU 22 provides reasonable opportunity to harvest for subsistence uses in all of Unit 22.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

PROPOSAL 25 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Close the nonresident moose hunting season in Unit 22C.

PROPOSED BY: Kawerak, Inc.

WHAT WOULD THE PROPOSAL DO? The proposal would close the nonresident season for moose in Unit 22C.

WHAT ARE THE CURRENT REGULATIONS? Resident and non-resident hunters are eligible to participate in moose registration permit hunt RM840 within the Unit 22C hunt area. Hunting in this area is administered with a shared harvest quota for both resident and nonresident hunters. Following are the current regulations, as defined in 5 AAC 85.045(20):

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 22(C)		
1 bull by registration permit only; or	Sept. 1 – Sept. 14	Sept. 1 – Sept. 14
1 antlered bull by registration permit only; during the period Jan. 1 – Jan. 31 a season may be announced by emergency order	Jan. 1 – Jan. 31 (Season to be announced)	No open season

There is a positive customary and traditional use finding for moose in Unit 22 with an ANS of 250–300 moose.

The Board of Game has identified moose in Unit 22 as qualifying for intensive management due to their importance for providing high levels of harvest for human consumptive use (5 AAC 92.108). The population objective for Unit 22 is 5,100-6,800 animals with a harvest objective of 300-680 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposal would eliminate the opportunity for nonresident hunters to harvest moose in Unit 22C. Adopting this proposal would have no biological effect on the local moose population because the hunt is managed under a permit and the season is closed by emergency order once the quota is met. Nonresident hunter participation is low in Unit 22C. Removing a component of the hunting pressure has the potential to result in a longer season, and would allocate the animals currently taken by nonresidents to residents.

BACKGROUND: The moose population in Unit 22C has historically persisted at or above the management objective of 450-525 moose. An Adaptive Cluster Sampling (ACS) moose survey completed in the Unit 22B and 22C survey area during 2021 estimated moose abundance in the area to be 1,415 moose (95% CI: 1129-1703), an increase since the last abundance survey in 2016 of 1,082 moose (95% CI:925-1212). The bull:cow ratio of the population was last estimated in 2021 at 31:100 and is above the management objective of 20:100.

The department has administered bull moose hunts in Unit 22C with annual harvest quotas since the implementation of registration permit RM840 in RY2004. Since the implementation of more conservative harvest guidelines in Unit 22C beginning in RY2013, the harvest quota has been met within the first 2 days of the fall season, with a 5-year average annual reported harvest of 18 moose.

RM840 is administered with separate harvest quotas for each of the three hunt areas in which it is administered: 22B West of the Darby Mountains (also known as 22B Remainder in regulation), 22C, and 22D (which includes 22D Kuzitrin and 22D Southwest). Of the three areas, Unit 22C is the only area where there is nonresident harvest opportunity. Harvest reports submitted to the department for RM840 indicate that, on average, 492 hunters actively participated in the hunt annually over the past 5 years (RY18-RY22). During this period, nonresident participants made up < 2% of the hunters, with an average of 2 nonresident hunters participating in the Unit 22C RM840 hunt annually compared with an average of 96 resident hunters. Nonresident harvest made up less than 1% of the total harvest, with a total of 2 moose taken by nonresident hunters out of 230 harvested moose in Unit 22C over the last 5 years.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative nature of this proposal. There would be no biological effect on the moose population due to the resident and nonresident harvest being managed under a quota which has been met within 2 days of the season opening for over 10 years. However, given this chronically short season, the board may wish to evaluate whether the current hunt structure provides for reasonable opportunity for subsistence harvest. RM840 permits are currently available in-person only at vendors in Nome, Golovin, White Mountain, and Brevig Mission, and Teller during July 25 – August 25.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 36 – 5 AAC 85.025 (21) Hunting seasons and bag limits for caribou.

Reduce the caribou bag limit for residents in Unit 23 from five caribou per day to four caribou total, only one of which may be a cow.

PROPOSED BY: Kotzebue Advisory Committee

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would reduce the resident bag limit in Unit 23 to four caribou per year, of which no more than one may be a cow.

WHAT ARE THE CURRENT REGULATIONS? The current regulations for caribou within Unit 23 are as follows:

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
Unit 23, that portion north of and including the Singoalik River drainage		
RESIDENT HUNTERS: 5 caribou per day, by reg- istration permit only, as follows:		
up to 5 bulls per day	July 1 - June 30	
up to 5 cows per day	July 15 - Apr. 30	
NONRESIDENT HUNTERS: 1 bull		Aug. 1 - Sept. 30
Remainder of Unit 23		
RESIDENT HUNTERS: 5 caribou per day, by registration permit only, as follows:		
up to 5 bulls per day	July 1 - June 30	
up to 5 cows per day	Sept. 1 - Mar. 31	
NONRESIDENT HUNTERS: 1 bull		Aug. 1 - Sept. 30

There is a positive customary and traditional use finding for caribou in Unit 23. Caribou harvests in this unit are subject to the following Amounts Reasonably Necessary for Subsistence (ANS) ranges:

Units 21, 22, 23, 24, and 26 (Western Arctic Herd, Teshekpuk Lake Herd): ANS= 8,000-12,000

The Western Arctic Caribou herd (WAH) has a positive intensive management finding, with a population objective of at least 200,000 caribou and a harvest objective of 12,000-20,000.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Based on the most recent patterns of distribution for the WAH, reductions to harvest would likely occur in Unit 23 overall. Opportunity to harvest caribou will still be provided while an attempt to reduce harvest, specifically female harvest, is appropriate due to declining abundance.

BACKGROUND: The WAH is currently experiencing a long-term decline which started in 2003 and has resulted in a population level decrease from approximately 490,000 in 2003 to 164,000 in 2022, which is below the population objective. While caribou populations are known to fluctuate naturally based on a variety of environmental factors, this decline is of significant concern due to the importance of caribou to various user groups. The home range of the WAH covers approximately 157,000 square miles and caribou are generally considered the primary terrestrial food source for many communities within that range (WACHWG 2022).

The Alaska Department of Fish and Game Subsistence Section has gathered information on caribou harvests in many communities within the WAH range during select years since the early 1980s. Local harvest and use levels can fluctuate by year depending on several factors, including a community's access to the herd based on annual variations in migratory routes and timing and the availability of other subsistence resources to local households that year. However, the vast majority of households rely heavily on caribou to meet their wild food needs. In 2014, 89% of households in Anaktuvuk Pass used caribou, and animals were harvested by 40% of households. That year caribou made up 90% of all wild food harvests by edible weight for the community (Brown et al. 2014). In another example, in 2017 96% of households in Noatak used caribou, and 51% of households harvested caribou (Gonzalez et al. 2018). The differences in percentages of households harvesting caribou and households using caribou indicate that many families rely on caribou that are shared with them by others to meet their subsistence needs.

A reduction in bag limit will likely impact sharing patterns as heavy harvesting households will be more limited in their ability to harvest, and thus share, with non-harvesting households.

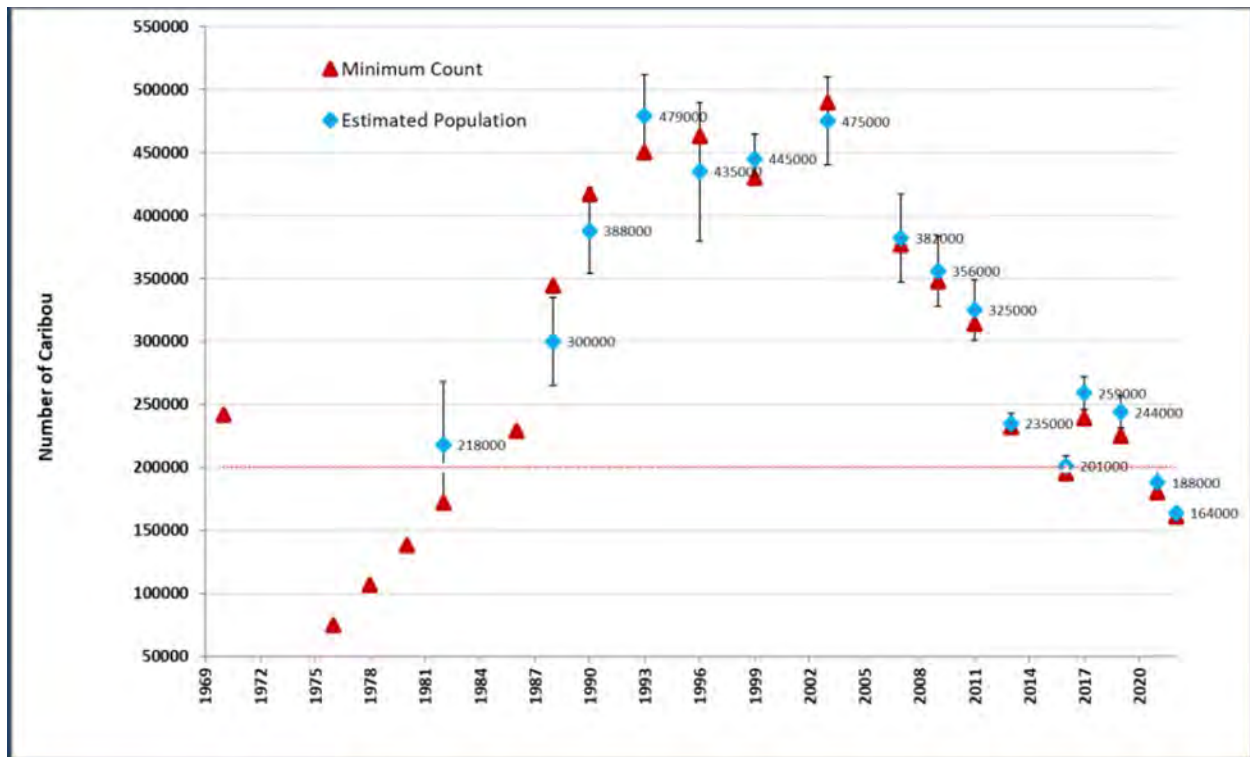


Figure 1. Western Arctic Caribou Herd population estimate 1970-2022. Minimum counts are indicated in red and estimated abundance is indicated with a blue diamond along with associated 95% confidence limits. Estimates are produced using an estimator described by Rivest et al (1998).

The importance of caribou conservation to local users was demonstrated by the Kotzebue Advisory Committee (AC) during a 2022 fall/winter meeting where they drafted a proposal to reduce the bag limit to 4 caribou per year, of which only 1 may be a cow and applied it to Unit 23 only. The Western Arctic Caribou Herd Working Group (WACHWG) followed suit a few weeks later during their December meeting drafting a similar proposal, the working group unanimously voted to use the same bag limit proposed by the Kotzebue AC but opted to include the entirety of the WAH range. The WACHWG is made up of various stakeholders including subsistence users from communities within the WAH range, hunters from outside the range of the herd, conservationists, hunting guides, reindeer herders and transporters. The combined proposals, (WSA22-05 and 06) coming from the NW Arctic and WI Subsistence Regional Advisory Committees show continued local support and understanding of the need for harvest reduction. The department recognizes and fully supports the readiness of these groups to reduce harvest to promote conservation of the WAH.

Harvest of the WAH is difficult to determine with limited harvest reporting across a wide geographic area. The department conservatively estimates that around 10% of the actual harvest is reported, recent attempts to increase reporting have included the establishment of registration hunts (RC800 and RC907) and outreach efforts focused on the need for harvest data. To fill in this data gap the department previously used a model to determine harvest by using subsistence household surveys, and the local availability (distance, weather, etc.) to determine the harvest level locally. This model has produced an average annual harvest of approximately 12,000 animals (Dau 2015). However, given changes to WAH distribution in recent years limiting

access by local users, the department has concluded the model is too coarse to track short term change and the use of the model has been discontinued at this time. It is generally understood that harvest rates have decreased due to reduction in access, however the information is too limited to understand the rate of reduction.

The recommended harvest rate based on figures presented in Table 2 of the WACHWG management plan (2019) for the 2022 population of 164,000 animals is ~4.8% or 7,872 animals. This estimate of harvestable surplus is far below the long-term average harvest for this herd as well as the lower end of the ANS range for the WAH; continued efforts to understand actual harvest are ongoing. Between 2019-2023, ADF&G Subsistence and the Division of Wildlife Conservation (DWC) partnered with 8 different communities within units 22 and 23 to document caribou harvests and uses. Working with locally hired research assistants, staff conducted voluntary household surveys to document this information in each of 4 communities during alternating years, resulting in all communities being surveyed twice. Results of this study will be published by July 1, 2024. However, preliminary analyses indicate that in recent years, Unit 22 communities have harvested fewer caribou than Unit 23 communities, in large part because of less access to the herd. Harvests ranged from 13-365 caribou per community per year in Unit 22, and between 81-405 caribou per community year in Unit 23. While useful for understanding local harvests, this information cannot be used in place of annual harvest information for the entirety of the herd. As part of ongoing efforts to understand overall WAH harvests, ADF&G Subsistence hosted an interagency round-table discussion in October 2023 to generate ideas for collaboration on documenting harvests across the WAH range using household surveys. Conversations defining those research partnerships are ongoing, but ideally by 2025 researchers will pilot a large-scale effort to conduct household caribou harvest surveys in a larger portion of communities across the range of the WAH.

In recent years harvest may have exceeded the harvestable surplus of the population. Reducing this harvest, particularly cow harvest, is an important step to slowing population decline. Estimated cow mortality is an important population metric and has remained above the long-term average since 2018. The change from 5 caribou per day to 4 per year only one of which may be a cow represents a significant reduction in harvest with an emphasis on reducing cow harvest.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to reduce harvest due to the overall decline of the WAH. Reducing harvest, specifically cow harvest, is appropriate due to the current decline in abundance and our challenges is estimating actual harvest.

If adopted, the board will need to consider whether reasonable opportunity for subsistence exists under the proposed regulatory structure. Specifically, the board may wish to consider whether nonsubsistence uses can still be provided and how the proposed regulations would impact the customary and traditional harvest and use patterns for caribou of many subsistence users.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs for the department.

PROPOSAL 37 – 5 AAC 85.025(21) Hunting seasons and bag limits for caribou.

Reduce the caribou bag limit for residents in Unit 23 from five caribou per day to four caribou total, only one of which may be a cow.

PROPOSED BY: Northwest Arctic Regional Advisory Council

WHAT WOULD THE PROPOSAL DO? If adopted, this proposal would reduce the resident bag limit in Unit 23 to four caribou per year, of which no more than one may be a cow.

WHAT ARE THE CURRENT REGULATIONS? The current regulations for caribou within unit 23 are as follows:

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
Unit 23, that portion north of and including the Singoalik River drainage		
RESIDENT HUNTERS: 5 caribou per day, by reg- istration permit only, as follows:		
up to 5 bulls per day	July 1 - June 30	
up to 5 cows per day	July 15 - Apr. 30	
NONRESIDENT HUNTERS: 1 bull		Aug. 1 - Sept. 30
Remainder of Unit 23		
RESIDENT HUNTERS: 5 caribou per day, by registration permit only, as follows:		
up to 5 bulls per day	July 1 - June 30	
up to 5 cows per day	Sept. 1 - Mar. 31	

NONRESIDENT HUNTERS:

1 bull

Aug. 1 - Sept. 30

There is a positive customary and traditional use finding for caribou in Unit 23. Caribou harvests in this unit are subject to the following Amounts Reasonably Necessary for Subsistence (ANS) ranges:

Units 21,22,23,24, and 26 (Western Arctic Herd, Teshekpuk Lake Herd): ANS= 8,000-12,000

The Western Arctic Caribou herd (WAH) has a positive intensive management finding, with a population objective of at least 200,000 caribou and a harvest objective of 12,000-20,000.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Based on the most recent patterns of distribution for the WAH, reductions to harvest would likely occur in Unit 23 overall. Opportunity to harvest caribou will still be provided while efforts to reduce overall harvest, specifically cow caribou, is appropriate with declining abundance in the WAH.

BACKGROUND: The WAH is currently experiencing a long-term decline which started in 2003 and has resulted in a population level decrease from approximately 490,000 in 2003 to 164,000 in 2022, which is below the population objective. While caribou populations are known to fluctuate naturally based on a variety of environmental factors, this decline is of significant concern due to the importance of caribou to various user groups. The home range of the WAH covers approximately 157,000 square miles and caribou are generally considered the primary terrestrial food source for many communities within that range (WACHWG 2022).

The Alaska Department of Fish and Game Subsistence Section has gathered information on caribou harvests in many communities within the WAH range during select years since the early 1980s. Local harvest and use levels can fluctuate by year depending on several factors, including a community's access to the herd based on annual variations in migratory routes and timing and the availability of other subsistence resources to local households that year. However, the vast majority of households rely heavily on caribou to meet their wild food needs. In 2014, 89% of households in Anaktuvuk Pass used caribou, and animals were harvested by 40% of households. That year caribou made up 90% of all wild food harvests by edible weight for the community (Brown et al. 2014). In another example, in 2017 96% of households in Noatak used caribou, and 51% of households harvested caribou (Gonzalez et al. 2018). The differences in percentages of households harvesting caribou and households using caribou indicate that many families rely on caribou that are shared with them by others to meet their subsistence needs. The sharing of caribou that occurs within communities and across the region is a pattern is consistently seen across study years for communities within the WAH range.

A reduction in bag limit will likely impact sharing patterns as heavy harvesting households will be more limited in their ability to harvest, and thus share, with non-harvesting households.

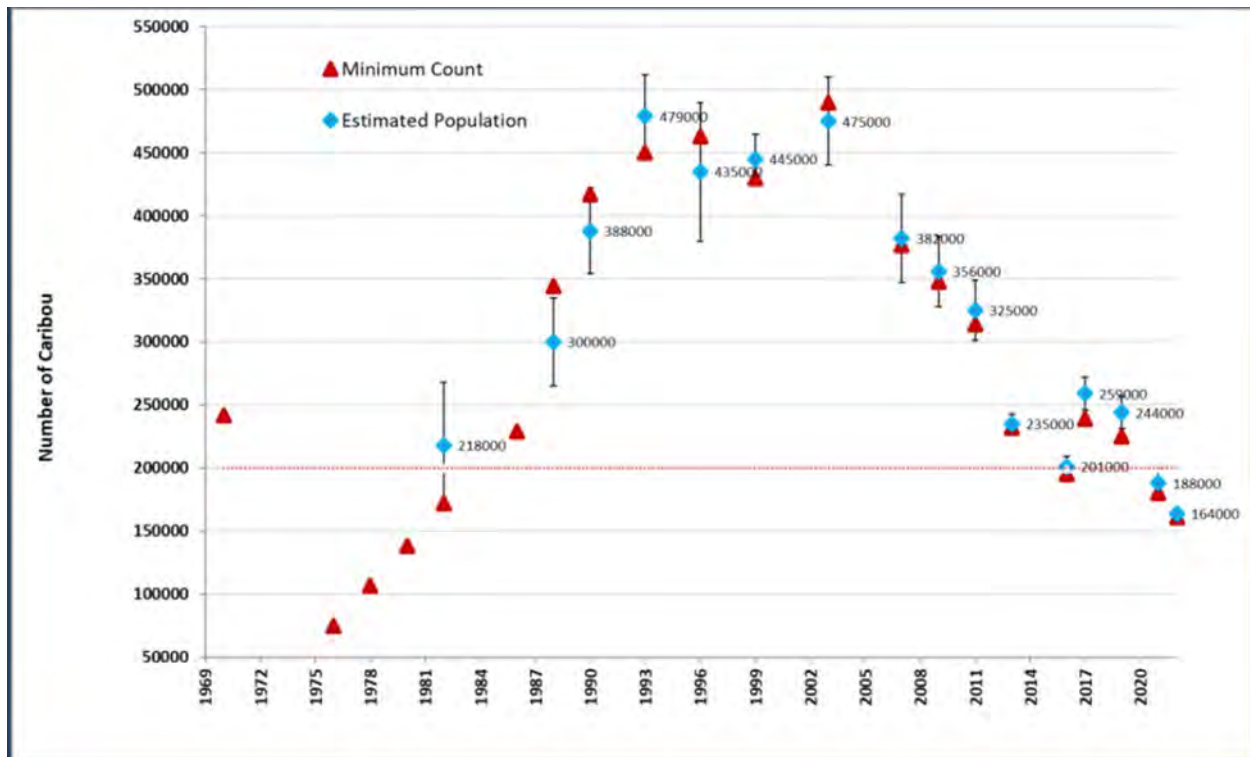


Figure 1. Western Arctic Caribou Herd population estimate 1970-2022. Minimum counts are indicated in red and estimated abundance is indicated with a blue diamond along with associated 95% confidence limits. Estimates are produced using an estimator described by Rivest et al (1998).

The importance of caribou conservation to local users was demonstrated by the Kotzebue Advisory Committee (AC) during a 2022 fall/winter meeting where they drafted a proposal to reduce the bag limit to 4 caribou per year, of which only 1 may be a cow and applied it to Unit 23 only. The Western Arctic Caribou Herd Working Group (WACHWG) followed suit a few weeks later during their December meeting drafting a similar proposal, the working group unanimously voted to use the same bag limit proposed by the Kotzebue AC but opted to include the entirety of the WAH range. The WACHWG is made up of various stakeholders including subsistence users from communities within the WAH range, hunters from outside the range of the herd, conservationists, hunting guides, reindeer herders and transporters. The combined proposals, (WSA22-05 and 06) coming from the NW Arctic and WI Subsistence Regional Advisory Committees show continued local support and understanding of the need for harvest reduction. The department recognizes and fully supports the readiness of these groups to reduce harvest and promote conservation of the WAH.

Harvest of the WAH is difficult to determine with limited harvest reporting across a wide geographic area. The department conservatively estimates that around 10% of the actual harvest is reported, recent attempts to increase reporting have included the establishment of registration hunts (RC800 and RC907) and outreach efforts focused on the need for harvest data. To fill in this data gap the department previously used a model to determine harvest by using subsistence household surveys, and the local availability (distance, weather, etc.) to determine the harvest level locally. This model has produced an average annual harvest of approximately 12,000 animals (Dau 2015). However, given changes to WAH distribution in recent years limiting

access by local users, the department has concluded the model is too coarse to track short term change and the use of the model has been discontinued at this time. It is generally understood that harvest rates have decreased due to reduction in access, however the information is too limited to understand the rate of reduction.

The recommended harvest rate based on figures presented in Table 2 of the WACHWG management plan (2019) for the 2022 population of 164,000 animals is ~4.8% or 7,872 animals. This estimate of harvestable surplus is far below the long-term average harvest for this herd and below the lower end of the ANS range for the WAH; continued efforts to understand actual harvest are ongoing. Between 2019-2023, ADF&G Subsistence and the Division of Wildlife Conservation (DWC) partnered with 8 different communities within GMU 22 and GMU 23 to document caribou harvests and uses. Working with locally hired research assistants, staff conducted voluntary household surveys to document this information in each of 4 communities during alternating years, resulting in all communities being surveyed twice. Results of this study will be published by July 1, 2024. However, preliminary analyses indicate that in recent years, Unit 22 communities have harvested fewer caribou than Unit 23 communities, in large part because of less access to the herd. Harvests ranged from 13-365 caribou per community per year in Unit 22, and between 81-405 caribou per community year in Unit 23. While useful for understanding local harvests, this information cannot be used in place of annual harvest information for the entirety of the herd. As part of ongoing efforts to understand overall WAH harvests, ADF&G Subsistence hosted an interagency round-table discussion in October 2023 to generate ideas for collaboration on documenting harvests across the WAH range using household surveys. Conversations defining those research partnerships are ongoing, but ideally by 2025 researchers will pilot a large-scale effort to conduct household caribou harvest surveys in a larger portion of communities across the range of the WAH.

In recent years harvest may have exceeded the harvestable surplus of the population. Reducing this harvest, particularly cow harvest, is an important step to slowing population decline. Estimated cow mortality is an important population metric and has remained above the long-term average since 2018. The change from 5 caribou per day to 4 per year only one of which may be a cow represents a significant reduction in harvest with an emphasis on reducing cow harvest.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to reduce harvest due to the overall decline of the WAH. Reducing harvest, specifically cow harvest, is appropriate due to the current decline in abundance and our challenges is estimating actual harvest.

If adopted, the board will need to consider whether reasonable opportunity for subsistence exists under the proposed regulatory structure. Specifically, the board may wish to consider whether nonsubsistence uses can still be provided and how the proposed regulations would impact the customary and traditional harvest and use patterns for caribou of many subsistence users.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs for the department.

PROPOSAL 38 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Close all nonresident caribou hunting in Unit 23 as follows:

PROPOSED BY: Northwest Arctic Regional Advisory Council (NWARAC)

WHAT WOULD THE PROPOSAL DO? The proposal would close the nonresident caribou season in Unit 23.

WHAT ARE THE CURRENT REGULATIONS?

Nonresident Caribou season:

1 Bull; August 1- September 30

Locking tag and harvest ticket required

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal were adopted, it would close all nonresident hunting of caribou in Unit 23.

BACKGROUND: Caribou are a highly valued game animal utilized by various groups in Unit 23. Caribou in Unit 23 primarily belong to the Western Arctic Herd (WAH). This herd is currently declining with a population of 164,000 during the 2022 census. An Intensive Management Population Level has been set for the WAH at 200,000. ANS for the WAH has been combined with the Teshekpuk Caribou Herd at 8,00-12,000. The herd has been in decline since the early 2000s when it was close to 500,000. This herd has supported an estimated harvest of 12,000 caribou per year since 1996. Harvest is believed to have declined within recent years as caribou become less available. The recommended harvest rate based on figures presented in Table 2 of the Western Arctic Caribou Herd Working Group (WACHWG) management plan (2019) for the 2022 population of 164,000 animals is ~4.8% or 7,872 animals. Harvest is likely to exceed harvestable surplus as the herd continues to decline.

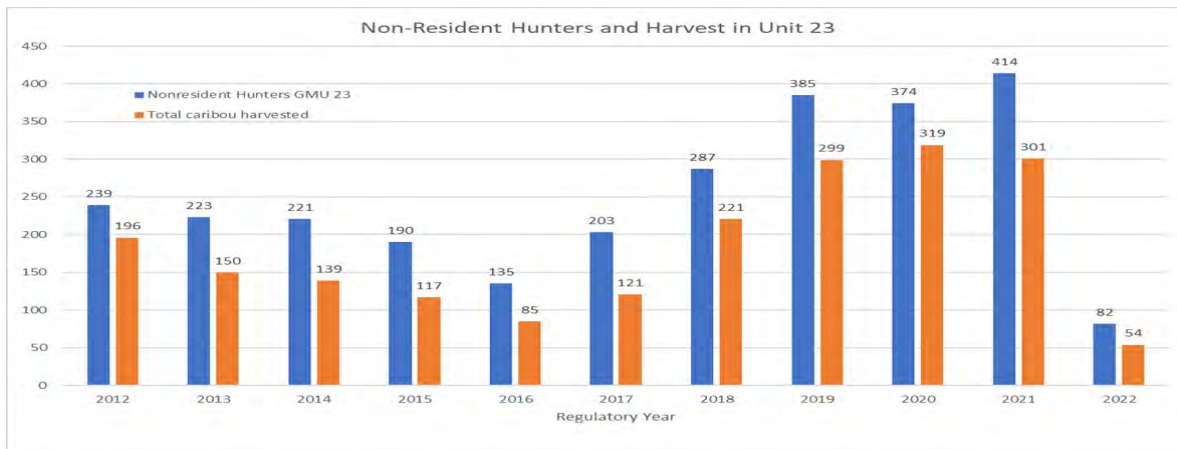


Table 1: Nonresident caribou hunter numbers shown in blue and number of harvested caribou shown in orange from 2012-2022.

Since 1996 harvest estimates for the Western Arctic Herd (WAH) indicate that local harvest accounts for approximately 95% of the total harvest with non-local/non-residents taking the remaining 5%. Federal land closures to hunting by Non-Federally Qualified Subsistence Users under WSA21-01 has reduced the area available for nonresident hunters. Annual nonresident harvest averaged 182 caribou, 97.82% of which were bulls (2012-2022). Bull:cow ratios remain well above the 30:100 goal set by the Western Arctic Herd Working Group.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because of its allocative nature. Although there are reasons to reduce harvest of the WAH, the limited number of bulls harvested by nonresidents is believed to be biologically insignificant, and the department is generally opposed to unnecessary reductions in opportunity. Considering the harvestable surplus and the ANS range, the board may wish to evaluate whether or not it can provide for all consumptive uses.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.
