



Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION
Headquarters

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November 12, 2021

An Agenda Change Request (ACR 6) has been submitted by the Alaska Department of Fish and Game to the Alaska Board of Game requesting to change 5 AAC 85.025(a)(5) Hunting seasons and bag limit for caribou. The proponent is asking the board to establish a hunt for Unimak caribou to address a rapidly growing population by increasing harvest commensurate with population levels to maintain it at or near the upper end of the objective of 1,000 caribou without having to propose BOG changes out of cycle.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is unaware of any error in regulation.
- B. The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.
- C. The department does believe that there is a biological concern that is caused by existing regulations. Historically, the remoteness of the herd, and modest number of state subsistence and federally qualified hunters have not provided the harvest necessary to contain the herd within carrying capacity, which has ultimately led to previous declines in population and habitat quality. The department is concerned that waiting for the population to reach objectives could result in a situation where it could grow beyond the capability of the existing hunters. Allowing some harvest as the population grows will slow the growth rate and encourage hunters to return to the hunt area.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f).
- E. The department is aware of an unexpected resource situation that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action. Although the UCH has not achieved its population objective of 800–1,000 animals, the herd has been growing by 10% annually to exceed 450 caribou with a harvestable surplus. Without a state hunt in place harvest will not be sufficient to take advantage of the surplus caribou.

The UCH currently has a positive customary and traditional use finding as part of the Southern Alaska Peninsula Caribou Herd (SAP) with an amount reasonably necessary for subsistence of 100-150 caribou. The Board will consider Proposal 26 at the Central and Southwestern BOG meeting in January 2022 to consider a separate C&T finding for the UCH, separate from the SAP. An amount reasonably necessary for subsistence for the UCH has therefore yet to be determined.

UCH has remained closed to hunting except for federally-qualified subsistence hunters since 2009. For this hunt to occur on federal lands, restrictions on non-federally qualified (NFQ) hunters would need to

be rescinded. Federal wildlife proposal WP22-38b, submitted by the Kodiak-Aleutians Subsistence Regional Advisory Council for the Federal Subsistence Board in April 2022, seeks to rescind the NFQ restriction at a to-be-determined population threshold to ensure adequate harvest. Upon authorization of a state hunt the department will also request the federal subsistence board rescind the closure to non-federally qualified hunters.

The next regularly scheduled board meeting for Unit 10 regulations is during winter/spring of 2021/2022 and 2024/2025. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2022 meeting in Fairbanks to allow for more public input.

Sincerely,

A handwritten signature in cursive script that reads "Ryan Scott".

Ryan Scott
Assistant Director
Division of Wildlife Conservation