

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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Anchorage, Alaska 99503-6199
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RAC/YKD22028.EP

Jerry Burnett, Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Email dfg.bog.comments@alaska.gov

Re: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Comments on Mulchatna Caribou Herd Management Strategy

Dear Chairman Burnett:

I am writing to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide comments at the Alaska Board of Game Statewide Regulations Meeting to be held March 4-12, 2022. The Council wishes to express its concerns about the decline in the Mulchatna Caribou Herd and recommend a management strategy in support of the caribou population recovery. Council member Alissa Nadine Rogers was nominated to provide these comments as oral testimony on behalf of the Council at the March 4-12, 2022 Board of Game Meeting.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's Charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting via teleconference on March 1-3, 2022. At that meeting the Council discussed and made recommendations to submit the following comments to the Alaska Board of Game:

Request to establish Mulchatna Caribou Herd hunting moratorium for a minimum of five years or until the sustainable population goal of 30,000 caribou has been met and there is harvestable

surplus available for equal subsistence harvest opportunities for communities across the range of the herd.

Additionally the Council will follow up with a similar request to the Federal Subsistence Board and Agenda Change Request proposal to Alaska Board of Game to:

- Establish jointly with the Federal Subsistence Board/Federal land managers a five-year moratorium to close the harvest of Mulchatna Caribou (or until the sustainable population objective goal of 30,000 caribou has been met) in order to help the caribou herd rebound so that the herd will once again be able to reach a population size that can sustain subsistence harvest into the future.
- Close all State and Federal lands to the harvest of Mulchatna caribou herd throughout their migratory range that includes all or portions of Units 9A, 9B, 9C, 17A, 17B, 17C, 18, 19A, and 19B units 9A, 9B, 9C, 17A, 17B, 17C, 17C remainder, 18, 18 remainder, 19A, and 19B.
- Maintain a sex ratio of 30 bulls: 100 cows (or a better ratio provided by biologists) that will increase caribou herd productivity.
- Support liberal subsistence harvest opportunity for bears and wolves.
- Conduct outreach on hunting regulations and closures, education, and incentives for caribou conservation measures.
- Improve knowledge of and compliance with harvest reporting requirements.

Justification:

The summer 2021 population estimate of the Mulchatna caribou herd is approximately 12,850, which is similar to the 2019 and 2020 estimates and well below the established minimum population objective of 30,000 caribou. As a result of this decline, conservation measures were implemented during the past two seasons including closures of the season by both State and Federal managers. To provide timely and flexible management, the Federal Subsistence Board delegated in-season management authority to the Togiak National Wildlife Refuge Manager for the 2020 -2022 hunting seasons. Since receiving management authority, the Togiak Refuge Manager in collaboration with staff from the Alaska Department of Fish and Game determined that there's no harvestable surplus that would allow the herd to grow. This hunting moratorium request is in the interest of allowing time for the Mulchatna Caribou Herd to recover. A closure to all harvest across the range of the Mulchatna Caribou Herd is warranted until the population can regrow to a sustainable level. A hunting moratorium will help send a clear message to all communities across the range of the herd about the dire situation of the herd's population size and the need to work together on communications and outreach to build support for these conservation efforts for a sustainable subsistence harvest opportunity in the future. The Council has experience with the success of similar hunting moratorium efforts in the past for moose on both the lower Yukon and Kuskokwim Rivers, and now those moose populations have rebounded to provide once again for ample subsistence harvest opportunity. We believe the same can be achieved for the Mulchatna Caribou Herd.

Chairman Burnett

The Council thanks the Alaska Board of Game for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Yukon-Kuskokwim Delta Region. The Council looks forward to continuing discussions with the Alaska Department of Fish and Game and the Alaska Board of Game on subsistence matters affecting the region. If you have questions about this letter, please contact me through Eva Patton, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 786-3358 or eva_patton@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ray Oney", is centered on a light beige rectangular background.

Raymond Oney
Chair

Cc: Federal Subsistence Board
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
Amee Howard, Deputy Assistant Regional Director, Office of Subsistence Management
Robbin La Vine, Subsistence Policy Coordinator, Office of Subsistence Management
Lisa Grediagin, Wildlife Division Supervisor, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record