

# STATE OF ALASKA

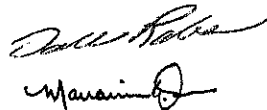
SEAN PARNELL, GOVERNOR

## DEPARTMENT OF FISH AND GAME

### DIVISION OF WILDLIFE CONSERVATION

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TO: Alaska Board of Game Members  
THRU: Kristy Tibbles, Executive Director, Boards Support  
FROM: Dale Rabe, Deputy Director, Wildlife Conservation  
Marianne See, Assistant Director, Subsistence  
DATE: June 17, 2010  
SUBJECT: Request to modify caribou regulations in Unit 26B



The Alaska Department of Fish and Game has reviewed the petition requesting that the Alaska Board of Game (Board) repeal parts of the caribou harvest regulations passed at the March 2010 meeting in Fairbanks. The petitioners feel that the new regulation will result in unsustainable harvest and waste of the resource. They also expressed concern about what they feel is a violation of public process associated with the amendments to proposal 104 that occurred after the public commented on the proposal. Our comments address issues related to the biological management of the Central Arctic Herd (CAH) in Unit 26B, and the department's assistance to the Board in providing information regarding customary and traditional uses of wildlife populations.

The Department does not agree with the assertion that the changes will result in unsustainable harvest of the CAH. Based on photo censuses, the CAH has grown substantially from 32,000 animals in 2002 to 67,000 in 2008, and is likely continuing to increase based upon high productivity and survival and low harvest. Annual harvestable surplus is very conservatively estimated at 3,350 (5% of herd size), well above the current total estimated annual take of 1,600. This estimate includes reported harvest and an estimated unreported take. The estimated unreported harvest includes 400-600 caribou by residents of 8 local communities on the fringe of the CAH range. These communities also rely on harvest of caribou from the Western Arctic, Teshekpuk, and Porcupine caribou herds, and therefore, assignment of their estimated harvest to any specific herd is uncertain. However, with a total of 600,000-625,000 animals among all herds, local harvest is likely not a significant factor for any of the herds at this time.

The current nonlocal harvest is moderated by limited access and limited infrastructure along the Dalton Highway. Firearms and motorized vehicles are not allowed within 5 miles of either side of the highway and few parking/camping areas for aircraft or highway vehicles are available. This situation will continue to substantially moderate harvest, regardless of liberalized regulations. The department is monitoring these factors and is prepared to take necessary actions to protect the herd if conditions change.

Harvest of cows will occur along the Dalton Highway during July- September. This take is expected to be relatively low because of Dalton Highway restrictions and because most of the

hunting takes place during the last 2 weeks of August and first part of September when bulls are available and hunters will likely be selecting for them. However, the cow harvest is estimated to be sustainable, given the size, productivity and survival of the CAH.

Enforcement of regulations is a vital part of assuring sustainable harvest of the CAH. The Alaska Wildlife Trooper (AWT) position in Coldfoot, that covers Northeast Alaska, has been vacant. However, a trooper was selected for this position and is expected to be in place by August 2010. AWT presence in the area will help to address concerns about wanton waste that may develop as a result of the liberalized bag limit.

We offer some background for consideration of the petition's claim that the Board did not address the provisions of AS 16.05.258 to consider the populations customarily and traditionally used for subsistence, in light of the proposed increased bag limit. The Board first made a positive Customary and Traditional Use determination for the Central Arctic Caribou Herd (CAH) in 1987, then reconfirmed this in 1993 and established an Amount Necessary for Subsistence finding of 250-450 caribou, which remains in regulation. In cases such as this one for which the proposed regulation would expand hunting opportunity, and if the Department does not have information for the Board that would merit a reconsideration of the current ANS, then the Department has no basis to request a review of the ANS range. Thus, the Board may or may not choose to conduct such a review in this situation.

The finding of an emergency is the responsibility of the Board. The Department does not have information that would appear to support a finding of a biological emergency as defined by the Board policy. The Department recommends that this issue should be considered in the normal Board cycle, at the 2012 Region III meeting.