



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Fish and Game

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U.S. Fish and Wildlife Service  
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### Advisory Council Chairs:

Thank you for your letter dated July 12, 2024, concerning the Western Arctic Caribou Herd (WAH). I share your concerns with the declining abundance and appreciate you all reaching out.

Harvest of the WAH is difficult to determine due to the lack of harvest reporting by residents across a wide geographic area. The ADF&G estimates conservatively that around 10% of the actual harvest is reported from the region. Attempts to increase reporting have included the establishment of registration hunts (RC800 and RC907) and concerted outreach efforts to local communities focused on the need for accurate harvest data.

To fill in this data gap ADF&G previously used a model to estimate harvest by using subsistence household surveys, and the local availability of caribou (distance, weather, etc.) to determine local harvest levels. This model has produced an average annual harvest of approximately 12,000 animals. However, given changes to WAH distribution in recent years limiting access to the herd by local users, ADF&G has concluded the model does not accurately track harvest trends and the use of the model has been discontinued.

It is generally understood that harvest rates have decreased for the WAH, however the information is too limited to understand the rate of reduction. Current efforts to better understand resident harvest are primarily focused on increasing participation in the RC800 and RC907 registration permits. Staff have also made continual efforts to visit communities within the range of the WAH to share wildlife updates, listen to concerns and issue permits. Those efforts will continue. We recognize the importance of working with local users and villages and understand the crucial role they can play in the conservation of the WAH as the primary harvesters of the resource.

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 2023 population of 152,000 animals, is ~4.8% or 7,300 animals. The non-federally qualified user (NFQU), Alaska resident and nonresident, harvest on the WAH has historically represented around 3% of the total estimated harvest (Figure 2), with most of that harvest coming from nonresidents.

Reporting of nonresident harvest of the WAH is nearly 100%. Until recently most nonresident harvest has occurred within Unit 23 on the Noatak Preserve. The Federal public land closures to caribou hunting by NFQUs beginning in 2016 have reduced the area available for these hunters in Unit 23 creating a shift of hunting pressure to Unit 26A and state lands within Unit 23.

Annual nonresident harvest averaged 180 caribou of which 97.8% were bulls (2012-2022). Bull:cow ratios remain well above the 30:100 goal set by the Western Arctic Herd Working Group. Bull:cow ratios have been above 38:100 since 2001 and the most recent survey resulted in 50:100 in 2023. The removal of primarily bull-focused harvest at this level is unlikely to influence the WAH and promote its recovery. Regarding harvest by Alaska residents not residing in communities of the WAH range, the harvest is incredibly low currently and the number of hunters is often in the single digits. This level of effort and resulting harvest is biologically insignificant and is almost entirely comprised of bull caribou.

The distribution of WAH caribou varies considerably from season to season and year to year. The ADF&G recognizes that the location of caribou directly influences harvest opportunity for hunters in the regions. I appreciate your comments recognizing multiple factors that may impact both herd distribution and migratory pathways. There are many opinions on the impact of hunters, and even other wildlife species on caribou movements and distribution. These are topics that need additional work to determine the extent of the impacts as well as identifying mitigation options. With the closure of all lands to NFQUs in Unit 23 under WSA24-30/31 the problem is exasperated when people are forced into smaller available areas to hunt. In a recent visit to Utqiagvik user conflicts were discussed and it is precisely because hunters are being forced into new areas because of federal closures to NFQUs. OSM provided the statement below for the original NFQU closure for the current closure review:

Support WP18-46 with modification to close all Federal public lands: within a 10-mile wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage to caribou hunting except by Federally qualified subsistence users for the 2018/2019 and 2019/2020 regulatory years. The closure would extend through September 21<sup>st</sup> of each calendar year only. The Council indicated that a closure through September 21<sup>st</sup> would allow ample time for lead cow caribou to establish migration routes through Unit 23 while providing some hunting opportunity for non-Federally qualified users.

Note that the Western Interior Regional Advisory Council stated cow caribou lead the migration. This said, it is important to tie this back to the hunting effort and harvest of the WAH; the non-local and nonresident harvest is minimal and is almost entirely bull caribou.

Adult female caribou survival appears to be the most significant factor towards arresting the decline in abundance and building the herd in the future. It is also important to note that the WAH is the second largest caribou herd in the state and one of the largest in the world, and it has demonstrated a tremendous capacity to rebound under the right conditions. As you carefully

pointed out, the people who manage and use the caribou have a limited ability to control environmental factors. This leaves us with few options to effect change other than limiting the harvest of cows, the productive engine of the herd.

The proposals submitted by the Northwest Arctic Regional Advisory Council, the WAH Working Group and the Kotzebue Advisory Committee are a courageous step forward in reversing the WAH decline. The ADF&G recognizes the dependence residents have on the WAH and the sacrifice it is to limit harvest. The compromise reached to provide a 15 caribou bag limit with only one being a cow is a great step. This was a compromise between the authors of multiple proposals. The work done to get there largely provided the support for the Board of Game (BOG) to adopt the amended proposal to continue to provide harvest opportunity while looking to the future to rebuild the herd. There is no doubt that more proposals will come before the BOG and the Federal Subsistence Board and I hope the spirit of compromise, where biological data supports, will continue.

We are committed to educating the public on the recent regulation changes and will work with the Department of Public Safety and our local Wildlife Trooper to ensure all hunters are following the rules. Waste of game meat for any purpose is egregious whether it be disposed of at the end of a hunt or left in the field, there is no excuse for wasteful practices.

I am open to further discussions on the topics in your letter. I encourage the Regional Advisory Councils to work with State Advisory Committees and the Alaska Board of Game to address regulatory options. Division of Wildlife Conservation staff are available to help inform these discussions and can relay ideas to division and department leadership.

Thank you again for your letter sharing your concerns for the health of the Western Arctic Caribou Herd. Our concerns about the herd are consistent with your views.

Sincerely,



Doug Vincent-Lang  
Commissioner

Cc: Stosh Hoffman, Chair, Alaska Board of Game  
Anthony Christianson, Chair, Federal Subsistence Board  
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Ryan Scott, Director, Div. of Wildlife Conservation, Alaska Department of Fish and Game