

## WP26–35 Executive Summary

<b>General Description</b>	Wildlife Proposal WP26-35 requests to extend the fall season for caribou in Unit 9D to October 21. <i>Submitted by: Bristol Bay Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<b>Unit 9D—Caribou</b>  <i>Unit 9D—1-4 caribou by Federal registration permit (FC0909) only    Aug. 1–<del>Sep. 30</del> <b>Oct. 21</b> Nov. 15–Mar. 31</i>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Bristol Bay Subsistence Regional Advisory Council Comment</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

## Draft Wildlife Analysis WP26-35

### ISSUE

Proposal WP26-35, submitted by the Bristol Bay Subsistence Regional Advisory Council (Council), requests to extend the fall season for caribou in Unit 9D to October 21.

### Proponent Statement

This proposal requests the Federal Subsistence Board lengthen the caribou season for federally qualified subsistence users in Unit 9D. This hunt is for the Southern Alaska Peninsula Caribou herd (SAPCH). The Alaska Board of Game extended the State caribou season in Unit 9D to October 21 via adoption of Proposal 7 at their January 2025 meeting, effective July 1, 2025. This proposed change would maintain alignment of State and Federal seasons.

### Current Federal Regulations

#### Unit 9D—Caribou

*Unit 9D—1-4 caribou by Federal registration permit (FC0909) only*      *Aug. 1–Sep. 30*  
*Nov. 15–Mar. 31*

### Proposed Federal Regulations

#### Unit 9D—Caribou

*Unit 9D—1-4 caribou by Federal registration permit (FC0909) only*      *Aug. 1–~~Sep. 30~~ Oct. 21*  
*Nov. 15–Mar. 31*

### Current State Regulations

**Note:** These are the State regulations for the 2025/26 regulatory year.

#### Unit 9D—Caribou

*Resident*                      *3 caribou*                      *HT Aug. 1-Oct. 21*  
*Nov. 15- Mar. 31*

<i>Nonresident</i>	<i>2 bulls</i>	<i>HT Aug. 1-Oct. 21</i>
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**Note:** These are the State codified regulations.

**Unit 9D–Caribou**

<i>If the harvestable portion is 99 caribou or less:</i>	<i>Residents-1 caribou by Tier II subsistence hunting permit</i>	<i>Aug. 1-Oct. 21 (subsistence hunt only)</i>
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*Nov. 15- Mar. 31  
(subsistence hunt only)*

<i>Nonresidents</i>	<i>No open season</i>
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<i>If the harvestable portion is greater than 99, but less than 151 caribou:</i>	<i>Residents-1 caribou by registration permit</i>	<i>Aug. 1-Oct. 21 Nov. 15-Mar. 31</i>
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<i>Nonresidents</i>	<i>No open season</i>
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<i>If the harvestable portion is greater than 150, but less than 251 caribou:</i>	<i>Residents-2 caribou</i>	<i>Aug. 1-Oct. 21 Nov. 15-Mar. 31</i>
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<i>Nonresident-2 bulls</i>	<i>Aug. 1-Oct. 21</i>
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<i>If the harvestable portion is greater than 250, but less than 451 caribou:</i>	<i>Resident-3 caribou</i>	<i>Aug. 1-Oct. 21 Nov. 15-Mar. 31</i>
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<i>Nonresident-2 bulls</i>	<i>Aug. 1-Oct. 21</i>
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<i>If the harvestable portion is greater than 450, but less than 551 caribou:</i>	<i>Resident-4 caribou</i>	<i>Aug. 1-Oct. 21 Nov. 15-Mar. 31</i>
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<i>Nonresident-2 bulls</i>	<i>Aug. 1-Oct. 21</i>
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*If the harvestable portion Resident-5 caribou  
is greater than 550  
caribou:*

*Aug. 1-Oct. 21*

*Nov. 15-Mar. 31*

*Nonresident-2 bulls*

*Aug. 1-Oct. 21*

## **Extent of Federal Public Lands**

Unit 9D is comprised of approximately 49% Federal public lands and consists of 49% U.S. Fish and Wildlife Service managed lands.

## **Customary and Traditional Use Determination**

Rural residents of Unit 9D, Akutan, and False Pass have a customary and traditional use determination for caribou in Unit 9D.

## **Regulatory History**

The SAPCH population began to decline during the early 1980s. In 1990, State and Federal resource managers agreed that all caribou harvest should cease when the population fell below 2,500 animals. The threshold level of 2,500 animals included caribou inhabiting Unit 9D and Unit 10 (Unimak Island). Alaska Department of Fish and Game (ADF&G) now recognizes the SAPCH on the Alaska Peninsula and the Unimak Caribou Herd (UCH) on Unimak Island as two separate herds (Butler 2005a, 2005b; Sellers 2003a, 2003b, Mager 2012).

To stem the population decline in Unit 9D, Federal public lands were closed by the Federal Subsistence Board (Board) to caribou hunting by non-federally qualified users in 1991. The Alaska Board of Game (BOG) closed the State hunt by emergency order in 1993. The Board closed Federal public lands in Unit 9D and Unit 10 (Unimak Island) to all caribou hunting in 1993 by Temporary Special Action S93-01, and subsequently adopted Proposal P94-28 in 1994, closing the Federal public lands to all users in regulation (OSM 1994).

In 1996, Proposal P96-28 requested opening a Unit 9D caribou season for King Cove residents only, but the Board deferred it until the next year (OSM 1996). Special Action SA96-03, submitted by the Aleutians East Borough, requested opening a caribou season in Units 9D and 10. In their request, local residents noted the disruption of traditional hunting patterns by closures since 1993, and requested limited harvest opportunities for the SAPCH. Ultimately, the Board rejected the request due to concerns that any harvest of the herd at that time would be detrimental to the population and would not be consistent with sound wildlife management principles.

Based on caribou surveys conducted in 1997, there were enough bulls in the herd to allow a subsistence harvest to resume on Federal public lands in Unit 9D and Unit 10 (Unimak Island). The

Board opened a season through Temporary Special Action SA97-01. This decision provided an Aug. 10–Mar. 31 hunt for Unit 10 (Unimak Island) and a Nov. 10–Mar. 31 hunt for Unit 9D. Approval of Emergency Special Action SA97-13 extended the 1997 season through April 30 in Unit 9D. Emergency Special Action SA98-05 authorized a Federal subsistence hunt in Unit 9D and Unit 10 from Aug. 1–Mar. 31 during the 1998/99 regulatory year.

The BOG reopened the Unit 9D State caribou season in 1999, allowing hunting by both Alaska residents and nonresidents. Local residents were concerned about the influx of nonlocal hunters in the vicinity of the Cold Bay area road system, especially during the waterfowl season. Noting these concerns, Temporary Special Action SA99-02, submitted by the False Pass Tribal Council, requested that Federal public lands be closed in Unit 9D and Unit 10 to the taking of caribou by non-federally qualified users. The Board rejected this request, pointing out that this was a user conflict issue, and not a conservation issue, since the biological data indicated the caribou herd could support the harvest at that time.

In 2000, Proposal WP00-29, submitted by the Kodiak/Aleutians Council, requested the Unit 9D and Unit 10 (Unimak Island) hunt be put into permanent regulation. That proposal was adopted with modification by the Board to provide a split season (Aug. 1–Sept. 25 and Nov. 15–Mar. 31) to allow the herd to recover following the rut (OSM 2000).

In 2002, Proposal WP02-21, submitted by the Kodiak/Aleutians Council and adopted by the Board, extended the fall season by five days for Unit 9D and Unit 10 (Unimak Island) from September 25 to September 30 (OSM 2002).

Emergency Special Action WSA03-08, submitted by the Kodiak/Aleutians Council and approved by unanimous consent of the Interagency Staff Committee, increased the harvest limit from one to two caribou for Unit 9D during the fall season of Aug. 1–Sept. 30, 2003. Temporary Special Action WSA03-10, approved by the Board, requested that the increased harvest limit of two caribou in Unit 9D also be allowed during the Nov. 15, 2003–Mar. 31, 2004 season due to the increased caribou population, which allowed for these increased harvest limits for federally qualified subsistence users.

In 2004, Proposal WP04-40 was adopted into regulation, increasing the harvest limit to two caribou in Unit 9D for the dates designated in the 2003 Special Actions (OSM 2004). This change allowed federally qualified subsistence users the opportunity to harvest two caribou throughout the fall and winter seasons.

In 2005/06, the State changed the resident bag limit from 1 caribou to one bull for the fall portion of the season and 1 antlerless caribou during the winter season for Unit 9D because the herd had started to decline.

In 2006, the Board adopted Proposal WP06-20 and changed the harvest limit for Unit 9D from two caribou to two bulls (OSM 2006). The change allowed the continued harvest of the SAPCH and eliminated the cow hunt at a time when the population was continuing to decline, while the bull:cow ratio was still within State management objectives.

Recognizing the continued decline of the SAPCH, the BOG restricted the harvest to bulls only for Unit 9D and closed the nonresident season during their March 2007 meeting (ADF&G 2007). The BOG also converted the general season resident hunt to a registration hunt, with a one bull harvest limit. Based on July 2007 caribou counts as well as past population declines, poor recruitment, and low bull:cow ratios, ADF&G issued Emergency Order No. 02-02-07 on July 17, 2007 to close resident caribou hunting in Unit 9D (Butler 2007). No State registration permits were issued for the 2007/08 regulatory year.

On July 30, 2007, the Board approved Special Action request WSA07-03 to close the fall season from Aug. 1–Sept. 30 to the taking of caribou in Unit 9D. The intent of this Special Action request was to eliminate additional caribou mortality caused by human harvest. On November 14, 2007, the Board approved Special Action WSA07-04 to close the winter caribou season for Unit 9D from Nov. 15–Mar. 31. Both Federal and State managers concurred that the SAPCH population decline posed a potentially significant conservation concern that warranted these actions.

In 2008, the Board adopted Proposal WP08-26, which closed Federal public lands and the caribou season in Unit 9D due to population trend and composition counts for the SAPCH indicating the caribou herd had been in a period of decline for the past several years (OSM 2008). Based on a carefully monitored population, using radio telemetry data, the changing age structure of the SAPCH population indicated that herd productivity was continuing to decline. The July 2007 recruitment survey indicated that no calves were expected to survive and the number of bulls in the population was decreasing. The Federal and State caribou seasons in Unit 9D remained closed until June 30, 2012.

In 2012, in response to increased calf survival and recruitment, increasing bull:cow ratios, and an increasing population, the Board adopted Proposal WP12-37 to open a limited caribou hunt of 1 bull in Unit 9D by federally qualified subsistence users by Federal registration permit only (OSM 2012). The SAPCH was close to 1,000 animals, which was the minimal threshold for harvest based on the Southern Alaska Caribou Herd Operational Plan (ADF&G and USFWS 1994). The season was split into two seasons, one before the rut (Aug. 1–Sept. 30) and one after the rut (Nov. 15–Mar. 31). In addition, the Izembek National Wildlife Refuge (NWR) Manager, after consultation with ADF&G, was delegated authority to adjust harvest quotas and announce any needed closures.

The Unit 9D caribou season remained closed under State regulations during 2012/13. In 2013/14, the State opened a Tier II caribou season that paralleled the Federal season. The harvest limit was one bull during the fall or one caribou during the winter by State registration permit. In 2015, the State Board of Game, in response to an increasing population trend, opened a registration hunt for one caribou in Unit 9D.

In 2018, the Board adopted WP18-20 with modification to change the Unit 9D harvest limit from one bull to one caribou and to extend the fall season from Aug. 10–Sept. 20 to Aug. 1–Sept. 30. The modification was to change the harvest limit to 1–4 caribou as recommended by the Kodiak/Aleutians Council and to delegate authority to the Izembek NWR Manager to set quotas, harvest limits, sex restriction, and any needed closures for caribou on Federal public lands in Unit 9D. The Delegation of

Authority Letter (DAL) (**Appendix 1**) allowed for management actions based on current herd status while reducing the risk of overharvest and providing maximum management flexibility (FSB 2018).

In 2025, the BOG adopted Proposal 7, extending the State caribou season in Unit 9D to October 21 for both residents and nonresidents. ADF&G submitted this proposal because the SAPCH is currently above population objective with little harvest. Additional harvest is needed to help keep the herd within management objectives (ADF&G 2025b).

## **Current Events**

Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and to rescind the associated DALs. The delegated authority to the Izembek NWR manager for in-season management of Unit 9D caribou is included in this proposal (**Appendix 1**).

## **Biological Background**

The range of the SAPCH, which is genetically distinct from both the Unimak caribou herd to the south and the Northern Alaska Peninsula Caribou Herd to the north (Mager 2012), extends from Port Moller to False Pass. The current management objectives for the SAPCH are to sustain a population between 1,500 and 4,000 caribou and maintain a minimum fall bull-to-cow ratio of 35:100 (ADF&G 2025a).

Historically the SAPCH population has undergone wide fluctuations, ranging from a low of 500 to more than 10,000 (Butler 2009). Following the 1983 peak, the population declined and by 1996, the herd was estimated to be only 1,403 animals. From 1996–2002, the population grew to about 4,100 caribou and then declined to approximately 770 animals by 2006. Since 2006, SAPCH post-calving counts have steadily increased to a minimum count of 3,408 caribou in July 2024 (**Table 1**) (Sowl 2007, USFWS 2017, ADF&G 2025a). The 2025 winter count of 2,151 is the highest winter count since 2007 (**Table 1**) (Williams 2025). The current population estimate is 3,800–4,000 caribou (ADF&G 2025).

Caribou herd composition surveys are normally conducted in October by State and Refuge biologists (**Table 1**). Calf:cow ratios, which are an index to productivity, have also fluctuated with the population counts. Under normal circumstances in a caribou population, approximately 25 calves:100 cows are necessary to offset adult mortality (Valkenburg et al. 1996). Calf:cow ratios since 2011 have averaged 31 calves:100 cows. During the July 2024 survey, ADF&G observed 32.9 calves:100 adults. During the summer, it is difficult to distinguish young bulls from cows, providing a different ratio than provided during the normal fall surveys (ADF&G 2025a).

During the calving season in the spring of 2008, intensive predator management began by culling 28 wolves on SAPCH calving grounds (ADF&G 2010). Calf survival showed a marked increase in October 2008 to 39% and continued to increase to 47% in 2010. Bull:cow ratios also increased from 10 bulls:100 cows in 2008 to 28 bulls:100 cows in 2010 (Butler 2010). Since 2011, bull:cow ratios have

averaged 46:100 which is above the management objective of 35:100 recommended in the Southern Alaska Peninsula Caribou Herd Operational Plan (ADF&G and USFWS 2008).

Skoog (1968) speculated that severe icing events and ash from frequent volcanic activity on the Alaska Peninsula had the potential to negatively affect the quantity, quality, and availability of food for the SAPCH. Increased winter mortality due to icing events may result in malnutrition and starvation for more susceptible bulls with depleted energy reserves following the rut (Dau 2004, Miller and Gunn 2003). Bull caribou die at a higher rate than cows due to greater energy demands during early winter rutting activities which greatly reduce their body reserves (Russell et al. 1993, Miller and Gunn 2003).

**Table 1.** Southern Alaska Peninsula Caribou Herd minimum population counts and fall composition counts from 2001 — 2025 (OSM 2018; Vande Voort 2023a, 2023b, and 2024; Vande Voort and Lichwa 2025; Williams 2025).

<b>Regula- tory Year</b>	<b>Total bulls: 100 cows</b>	<b>Calves: 100 cows</b>	<b>Calves (%)</b>	<b>Cows (%)</b>	<b>Total bulls (%)</b>	<b>Compo- sition Sample size<sup>a</sup></b>	<b>Winter Count<sup>b</sup></b>	<b>Post calving count<sup>c</sup></b>
<b>2001-02</b>	57	38	19	51	30	1313	-	-
<b>2002-03</b>	38	16	10	65	25	932	4100	-
<b>2003-04</b>	40	8	5	68	27	1257	-	-
<b>2004-05</b>	36	7	5	70	25	966	1872	-
<b>2005-06</b>	30	6	5	73	22	1040	1651	-
<b>2006-07</b>	16	1	1	86	26	713	770	-
<b>2007-08</b>	15	1	1	87	12	431	-	600
<b>2008-09</b>	10	39	26	67	7	570	-	700
<b>2009-10</b>	21	43	2	61	13	679	-	800
<b>2010-11</b>	28	47	27	57	16	532	790	-
<b>2011-12</b>	40	20	13	62	25	920	1061	-
<b>2012-13</b>	45	20	12	60	27	500	-	-
<b>2013-14</b>	50	40	21	53	26	1273	877	1720
<b>2014-15</b>	45	45	24	53	24	884	1316	-
<b>2015-16</b>	-	-	-	-	-	-	1568	-



<b>Regulatory Year</b>	<b>Total bulls: 100 cows</b>	<b>Calves: 100 cows</b>	<b>Calves (%)</b>	<b>Cows (%)</b>	<b>Total bulls (%)</b>	<b>Composition Sample size<sup>a</sup></b>	<b>Winter Count<sup>b</sup></b>	<b>Post calving count<sup>c</sup></b>
<b>2016-17</b>	49	38	21	53	26	1422	-	-
<b>2017-18</b>	-	-	-	-	-	-	-	-
<b>2018-19</b>	62	42	17	49	31	1152	1435	
<b>2019-20</b>	-	-	-	-	-	-	2091	-
<b>2020-21</b>	45	32	18	57	25	1496	-	-
<b>2021-22</b>	-	-	-	-	-	-	-	1055
<b>2022-23</b>	35	52	28	54	19	1413	-	
<b>2023-24</b>								3408
<b>2024-25</b>		32.9 <sup>d</sup>					2151	

<sup>a</sup> Estimates based on October composition surveys

<sup>b</sup> Estimates based on winter (January and April) counts by Izembek National Wildlife Refuge staff.

<sup>c</sup> Estimates based on July post calving counts and the proportion of the ratio collared caribou encountered.

<sup>d</sup> July estimate

## Cultural Knowledge and Traditional Practices

The Aleut (Unangan) have historically inhabited and hunted in Unit 9D. Traditionally, people hunted caribou within the Alaska Peninsula and Unimak Island with bow and arrows (McCartney 1984; Lantis 1984). Both archaeological and historical records suggest that caribou was an important subsistence resource for the eastern Unangan and that they occasionally traded caribou with their more westerly Unangan neighbors (Dumond 1977; McCartney 1984; Laughlin 1980).

Russian traders and explorers travelled to the Aleutian Islands in the mid-eighteenth century (Fall et al. 1996; McCartney 1984). It was soon after this expedition that Russia claimed sovereignty over Alaska and a 126-year period of exploration fueled by economic interests ensued (McCartney 1984; Morseth 2003; Partnow 2001). These activities brought both Russian and later Europeans into contact with the Unangan of the Alaska Peninsula (Morseth 2003; VanStone 1984). Several Russian men took Unangan women as wives and their children represented a creole population; they held a special class within the Russian social and legal system (Partnow 2001). Partnow (2001) notes that by the 1860s, the Russian-American Company had a local workforce and that the day-to-day operations through the colony was mainly handles by creoles. Russia sold Alaska to the United States in 1867 which brought an influx of exploration and settlement to the Alaskan Peninsula by Europeans interested in trapping, mining, and fishing (Morseth 2003). Today, the region is known for its productive salmon fisheries with major processing operations located at Sand Point and King Cove (ADF&G 2017b).

Contemporary subsistence use for the Southern Alaska Peninsula Caribou Herd is limited (Fall et al. 1990). A study by Fall et al. (1990) reported that the communities of False Pass, King Cove, Nelson Lagoon, and Sand Point have consistently hunted caribou within Unit 9D and continued to do so for the study years 1985-1987. In subsequent surveys of the communities of False Pass, King Cove, and Sand Point, large mammal harvest ranged between 11% and 19% (Fall et al. 1993a; Fall et al. 1993b; Fall et al. 1996). In these Unit 9D communities, caribou was harvested at 10 lb per capita in Sand Point, 19 lb per capita in King Cove, and 74 lb per capita in False Pass (Fall et al. 1993; Fall et al. 1996). Additionally, use was high with 51%, 64%, and 90% of households reporting use in Sand Point, King Cove, and False Pass, respectively (Fall et al. 1993a; Fall et al. 1993b; Fall et al. 1996).

During each study year, communities within Unit 9D harvested or hunted for caribou in Units 9D, 9E, and 10. Harvest and search areas specific to Unit 9D include all of the lower Alaska Peninsula, south and west of Pavlof Bay, Beaver Bay along the coast to the Kupreanof Peninsula, and all of Unimak Island (ADF&G 1996; Fall et al. 1996).

### **Harvest History**

In the early 1980s, when the SAPCH was at its peak, the annual harvest probably exceeded 1,000 caribou several times. Between 2006 and 2012, the SAPCH population was below 1,000, and as a result, no legal harvest occurred under State or Federal regulations. Between 2013 and 2024, reported harvest has ranged from 12-83 caribou, averaging 40 caribou (**Table 2**). A majority of the harvest taken by residents from Unit 9D (SAPCH) are from Cold Bay and King Cove. Since 2018, nonresident harvest has surpassed resident harvest, accounting for 88% of total reported harvest in 2023 (ADF&G 2025). No harvest has occurred by Federal permit under Federal regulations since 2005 (**Table 2**).

The SAPCH population objective is 1,500-4,000 caribou, and the current population estimate is 3,800-4,000 caribou. This herd has a history of precipitously declining after reaching the upper end of the population objective (ADF&G 2025). This herd would need a harvest of approximately 300 caribou to maintain the upper end of the population objective. Over 300 caribou harvested is needed to prevent the herd from another precipitous decline. In 2023, there were only 80 bull caribou harvested from the SAPCH (ADF&G 2025). During RY 2024/25 there were 75 bull caribou, and 3 female caribou harvested from the SAPCH (Vande Voort 2025 pers. comm.).

**Table 2.** Harvest of SAP caribou based on Federal and Stater permits (OSM 2018; Vande Voort 2023a, 2023b, and 2024; Vande Voort 2025 pers. comm.; Vande Voort and Lichwa 2025; Williams 2025).

Year	Federal Registration Permits			State Permits			Total State and Federal Reported Harvest <sup>a</sup>
	Permits Issued	Bulls	Cows	Permits Issued	Bulls	Cows	
2001	11	7	0	69	45	4	56
2002	4	3	0	86	53	5, 2 UNK	63
2003	28	5	1	64	43	1, 1 UNK	51
2004	30	5	2	92	63	6, 1 UNK	77
2005	101	23	1	63	36	2	62
2006	113	29	0	65	27	2	58
2007-2012	0	0	0	1	0	0	0
2013	1	0	0	25	17	1	18
2014	0	0	0	19	11	1	12
2015	3	2	0	24	17	2	21
2016 <sup>b</sup>	31	7	0	66	36	4	47
2017	0	0	0	75	47	2	49
2018	0	0	0	71	50	3, 1 UNK	53
2019	0	0	0	80	55	1 UNK	56
2020	9	0	0	97	61	4	74
2021	0	0	0	106	75	1	76
2022	2	0	0	92	54	3	59
2023	0	0	0	106	83	0	83
2024	8	0	0	116	75	3	78

<sup>a</sup> Doesn't include Illegal or unreported harvest

<sup>b</sup> 75 Federal registration were allocated

### Alternative(s) Considered

One alternative considered was to eliminate the Federal permit requirement. The State caribou hunt in Unit 9D only requires a harvest ticket. The Federal permit was implemented when the hunt was just reopening after a population decline. However, very little harvest occurs under the Federal permit, which may now be an unnecessary administrative burden for both federally qualified subsistence users and Federal managers as the SAPCH is now nearing the upper bound of its population objective range. However, the Federal permit provides the in-season manager the flexibility to announce Federal subsistence specific harvest limits.

## **Discussion and Effects**

If this proposal is adopted, the closing date for the fall caribou season in Unit 9D would be extended to October 21. This would provide additional opportunity for federally qualified subsistence users hunting under Federal regulations. However, all users may already hunt caribou in Unit 9D under State regulations until October 21.

Adopting this proposal would also decrease regulatory complexity and confusion by maintaining alignment between State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to “ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands.”

There are no conservation concerns for the SAPCH. Rather, additional harvest is recommended to prevent a population crash. The SAPCH population objective is 1,500-4,000 caribou, and the current population estimate is 3,800-4,000 caribou. Approximately 300 caribou need to be harvested each year from the SAPCH to safeguard against a precipitous population decline, while recent reported harvest has been less than 100 caribou (ADF&G 2025).

## **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP26-35.

### **Justification**

The proposal increases subsistence opportunity under Federal regulations, reduces regulatory complexity by maintaining alignment with State regulations, and there are no conservation concerns. Rather, increased harvest on the SAPCH may help prevent a population crash.

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## APPENDIX 1



FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

### Federal Subsistence Board

1011 East Tudor Road, MS121  
Anchorage, Alaska 99503-6199



FOREST SERVICE

OCT 10 2018

OSM 180051.CM

Refuge Manager  
Izembek National Wildlife Refuge  
P.O. Box 127 MS 515  
Cold Bay, Alaska 99571-0127

Dear Refuge Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Izembek National Wildlife Refuge Manager to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 9D for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), and the Chair of the affected Council(s) to the extent possible. The Office of Subsistence Management will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

#### DELEGATION OF AUTHORITY

1. **Delegation:** The Izembek National Wildlife Refuge Manager is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

**2. Authority:** This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

**3. Scope of Delegation:** The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

- To set quotas, harvest limits, sex restrictions, and any needed closures for caribou on Federal public lands in Unit 9D.

This delegation also permits you to close and reopen Federal public lands to nonsubsistence hunting, but does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations or adjustments to methods and means of take, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Unit 9D.

**4. Effective Period:** This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

**5. Guidelines for Delegation:** You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected Federally qualified subsistence users and non-Federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government to Government Tribal Consultation Policy (Federal Subsistence Board Government to Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

Refuge Manager

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6. **Support Services:** Administrative support for regulatory actions will be provided by the Office of Subsistence Management.

Sincerely,



Anthony Christianson  
Chair

Enclosures

cc: Federal Subsistence Board

Assistant Regional Director, Office of Subsistence Management  
Deputy Assistant Regional Director, Office of Subsistence Management  
Subsistence Policy Coordinator, Office of Subsistence Management  
Wildlife Division Supervisor, Office of Subsistence Management  
Subsistence Council Coordinator, Office of Subsistence Management  
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council  
Commissioner, Alaska Department of Fish and Game  
Special Assistant to the Commissioner, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record