

Alaska Department of Fish and Game Comments

Wildlife Proposal WP26-53

This proposal would modify the federal hunting regulations in portions of Game Management Unit (GMU) 22B and 22D for caribou hunting to accommodate the presence of reindeer herding in the area.

Position

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** this proposal. By adjusting these two hunt areas to may be announced seasons during the July 1 – June 30 timeframe will create consistency between state and federal regulations while avoiding the accidental take of reindeer.

Background

The Alaska Board of Game (BOG) established the resident RC800 caribou hunting permit in Regulatory Year (RY) 2016 to allow for caribou hunting in GMU 22 while also preventing hunting in areas where active reindeer herding operations occur. These areas are noted in the regulations as “May Be Announced” seasons for residents under the RC800 permit and nonresidents hunting under the general season harvest ticket (HT) to allow ADF&G to open these areas to caribou hunting by emergency order if caribou are observed in active reindeer ranges to minimize conflicts with Seward Peninsula reindeer herding.

Caribou from the Western Arctic Caribou Herd (WAH) have not been documented in these two portions of GMU 22 since 2015. If caribou are later confirmed to be in the area, ADF&G has the ability to open the hunting season for residents and nonresidents at that time.

Because caribou are not present in the western portions of GMU 22B and 22D identified in this emergency order, hunting is being restricted to prevent the harvest of reindeer that may be mistakenly identified as caribou. If caribou were to enter areas of active reindeer herding, hunting seasons will be opened by ADF&G by emergency order to provide caribou harvest opportunity; however, hunters are cautioned to identify their targets carefully to avoid the take of reindeer which are herders’ private property. Reindeer are private property and are not subject to harvest as game animals managed by the department.

Impact on Federally Qualified Users

If adopted there will be less confusion by federally qualified users when hunting caribou in portions of GMU 22B and 22D.

Impact on Other Users

If adopted there will be less confusion by non-federally qualified hunters when hunting caribou in portions of GMU 22B and 22D.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game has made a positive customary and traditional use findings for the Western Arctic and Teshekpuk Lake (TCH) caribou herds.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOG to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for caribou from the WAH and TCH is 8,000-12,000 animals. The season and bag limit for GMU 22B and D is:

Fifteen caribou total, only one of which may be a cow.

Unit(s)	Bag Limit	Resident	Non-resident
Unit 22(B), that portion west of Golovnin Bay, and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage	15 caribou total, by registration permit RC800 up to 5 caribou per day May 1 – Sept 30; cow caribou may not be taken Apr. 1 – Aug 31	No open season	No open season
Unit 22(D), that portion in the Pilgrim River drainage	15 caribou total, by registration permit RC800 up to 5 caribou per day May 1 – Sept 30; cow caribou may not be taken Apr. 1 – Aug 31	No open season	No open season

Conservation Issues

There will be no conservation issues caused by the passage of this proposal.

Enforcement Issues

Any enforcement issues that currently exist because of the difference in state and federal regulations should be alleviated by the passage of this proposal.