



Federal Subsistence Board News Release



U.S. Fish and Wildlife Service
Bureau of Land Management
National Park Service
Bureau of Indian Affairs

Forest Service

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Federal Subsistence Board Closes Fall Caribou Season in Unit 13

The Federal Subsistence Board (Board) approved WSA23-01/03 to close the Federal caribou season in Unit 13 from August 1–September 30, 2023.

Emergency Wildlife Special Actions WSA23-01, submitted by the Alaska Department of Fish and Game (ADF&G), and WSA23-03, submitted by the Bureau of Land Management and the Ahtna Intertribal Resources Commission, request that the fall caribou season in Unit 13 be closed due to a dramatic decline in the Nelchina caribou herd population.

The Board approved WSA23-01/03 recognizing that conservation concerns warrant a closure to all users for the fall 2023 season. The most recent population information shows the Nelchina Caribou Herd in serious decline. The fall 2022 estimate was 17,433 animals, a reduction in 50% from the fall 2021 estimate and well below the State management objective of 35,000–40,000 caribou. Additionally, composition metrics for the herd are concerning, with a calf:cow ratio of 16:100 and a bull:cow ratio of 26:100, both of which are well below the management objective of 40:100 for each. ADF&G has closed all State caribou seasons throughout Unit 13, and it is prudent that Federal lands be closed in unison to protect the viability of the herd. Such a closure is consistent with ANILCA Section 816(b) and is needed for conservation of the Nelchina Caribou Herd and to provide for the continuation of subsistence uses of the caribou resource in the long-term.

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STAFF ANALYSIS
EMERGENCY SPECIAL ACTION
WSA 23-01/03

ISSUES

Emergency Wildlife Special Action WSA23-01, submitted by the Alaska Department of Fish and Game (ADF&G), and WSA23-03, submitted by the Bureau of Land Management (BLM) and the Ahtna Intertribal Resource Commission (AITRC), request closing the Federal fall caribou hunt on the Nelchina Caribou Herd (NCH) within Unit 13 for the 2023 season. If approved by the Federal Subsistence Board (Board) this action would close the Federal hunt in Unit 13 from August 1 through September 30.

DISCUSSION

The proponents state the most recent NCH abundance estimate in fall of 2022 was 17,433 animals, which is well below the management objective of 35,000–40,000 caribou. In addition, population composition ratios associated with the herd of 26 bulls:100 cows and 16 calves:100 cows, are well below management objectives of 40 bulls or calves:100 cows for each. Severe weather conditions during the winters of 2021/22 and 2022/23 caused high overwinter mortality of both adults and calves, leading to a reduction in the overall population and lower than expected spring recruitment. Observed productivity of the herd has not been sufficient to cause population growth from 2021 to present. Based on the most recent data, the proponents determined there is no harvestable surplus available for the fall 2023/24 season. ADF&G intentionally did not offer drawing hunts for both the resident (DC485) and youth (YC495) hunts and has closed State caribou hunts in Unit 13 via Emergency Order (EO) No. R4-01-23 on June 30, 2023. Additional abundance surveys were conducted in early July 2023, but as of this writing the data is not yet available.

The applicable Federal regulations are found in 36 CFR 242.19(a) and 50 CFR 100.19(a) (Emergency Special Actions) and state that:

“...In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses, or close public lands to take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses.”

Existing Federal Regulation

Unit 13–Caribou

*Units 13A and 13B—2 caribou by Federal registration permit only Aug. 1–Sep. 30
(FC1302). The sex of animals that may be taken will be announced by*

the Glennallen Field Office Manager of the Bureau of Land Management in consultation with the Alaska Department of Fish and Game area biologist and Chairs of the Eastern Interior Regional Advisory Council and the Southcentral Regional Advisory Council Oct. 21–Mar. 31

Unit 13, remainder—2 bulls by Federal registration permit only (FC1302) Aug. 1–Sep. 30
Oct. 21–Mar. 31

Proposed Federal Regulation

Unit 13–Caribou

Units 13A and 13B—2 caribou by Federal registration permit only (FC1302). The sex of animals that may be taken will be announced by the Glennallen Field Office Manager of the Bureau of Land Management in consultation with the Alaska Department of Fish and Game area biologist and Chairs of the Eastern Interior Regional Advisory Council and the Southcentral Regional Advisory Council ~~Aug. 1–Sep. 30~~
Oct. 21–Mar. 31

Unit 13, remainder—2 bulls by Federal registration permit only (FC1302) ~~Aug. 1–Sep. 30~~
Oct. 21–Mar. 31

Existing State Regulation

Unit 13–Caribou

Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details RC561 No open season.

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Residents – One caribou by permit per household, available only by application. See the Subsistence Permit Hunt Supplement for details CC001 No open season.

Nonresidents – One bull caribou by permit DC475 No open season

Extent of Federal Public Lands

Unit 13 is comprised of approximately 13% Federal public lands and consists of 6% National Park Service (NPS) managed lands, 5% Bureau of Land Management (BLM) managed lands, and 2% U.S. Forest Service (USFS) managed lands (**Figure 1**).

Federal public lands within Denali National Park as it existed prior to the Alaska National Interest Lands Conservation Act (ANILCA) (December 1980) are closed to all hunting and trapping. Federal public lands within the ANILCA additions to Denali National Park are closed to hunting and trapping by non-federally qualified subsistence users. BLM manages additional lands within Unit 13 that are selected for conveyance by the State of Alaska or Native Corporations and are not currently available for Federal subsistence because of the land selection status. If these land selections are relinquished, they would become lands available for Federal subsistence.

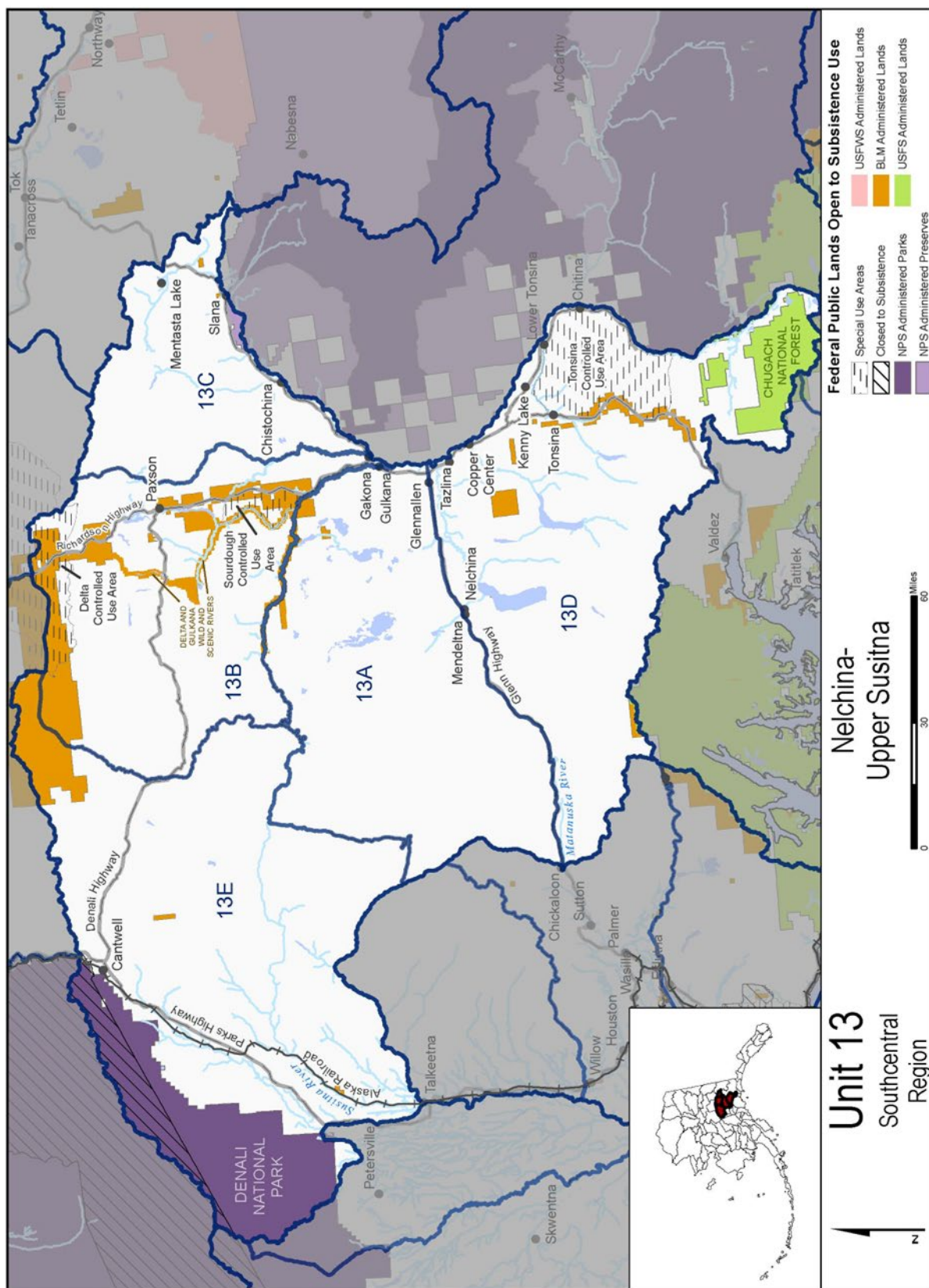


Figure 1. Map of Unit 13 and all subunits.

Customary and Traditional Use Determinations

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, 20D (excluding residents of Fort Greely), and Chickaloon have a customary and traditional use determination for caribou in Unit 13B.

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, Chickaloon, Dot Lake, and Healy Lake have a customary and traditional use determination to harvest caribou in Unit 13C.

Residents of Units 11, 12 (along the Nabesna Road), 13, and Chickaloon have a customary and traditional use determination to harvest caribou in Unit 13A and 13D.

Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, and the area along the Parks Highway between mileposts 216-239 (excluding the residents of Denali National Park Headquarters) have a customary and traditional use determination to harvest caribou in Unit 13E.

Regulatory History

The following regulatory history is abbreviated for the purposes of this emergency special action. A full description of Federal and state actions relevant to the NCH can be found in the most recent analysis of Wildlife Proposal WP24-09 (OSM 2023a).

The NCH is an important resource for many rural and non-rural users. Its proximity to the Glenn and Richardson highways enhances accessibility of the NCH to Anchorage and Fairbanks residents (Tobey 2003). A State Tier II system for NCH harvest was established in 1990 for Unit 13. A State Tier I permit was added for the 1996/97 and 1997/98 regulatory years to allow any Alaskan resident to harvest cows or young bulls to reduce the herd to the management objective of 35,000–40,000 caribou (ADF&G 1997). In 1998, the Tier I hunt was closed, as the herd was brought within management objectives due to increased harvest and lower calf recruitment (ADF&G 2001).

Between 1998 and 2008, the Board adjusted seasons, harvest limits, and opportunities to hunt on Federal public lands dependent on regulatory proposals, requests from the public, and herd assessment by managers. Season length and harvest limits changed in concert with the population estimates of the NCH. When population metrics allowed for additional harvest, requests were adopted to allow for more Federal harvest. In 2007 ADF&G issued EO 02-01-07, which closed the remainder of the 2006/07 State season for the NCH on February 4, due to high State hunter success in the State Tier II hunt. Likewise, EO 02-08-07 closed the 2007/08 Tier II hunt on September 20. The hunt was scheduled to re-open on October 21, but concerns about unreported harvest in both the State and Federal hunts resulted in the closure remaining for the rest of the season.

In 2009, the Alaska Board of Game (BOG) eliminated the State Tier II hunt but added two new hunts: a Tier I hunt and a Community Harvest hunt for residents of Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Copper Center. The harvest limit for each was one caribou (sex to be announced annually) with season dates of Aug. 10–Sep. 20 and Oct. 21–Mar. 31 and a harvest quota of

300 caribou, each. A federally qualified subsistence user could opt into the State community harvest system or use a State registration permit to harvest one caribou under State regulations and then get a Federal permit to harvest an additional caribou within Unit 13 since the Federal harvest limit was two caribou. However, State regulations stipulate that Tier I and community harvest system permit holders may not hunt moose or caribou under State or Federal regulations outside of Unit 13 and the Copper Basin Community Hunt area, respectively (ADF&G 2019a).

In July 2010, the Alaska Superior Court found that elimination of the Tier II hunt was arbitrary and unreasonable (ADF&G 2010a). In response, the BOG held an emergency teleconference in July 2010 and opened a Tier II hunt from Oct. 21–Mar. 31, maintained the existing Tier I season, and awarded up to 500 additional Tier I permits (ADF&G 2010a). Subsequently, EO 04-1-10 closed the remainder of the winter NCH Tier II season due to harvest reports indicating that approximately 1,404 bulls and 547 cows were harvested, and unreported harvest was expected to raise the total harvest above the harvest objective (ADF&G 2010b; OSM 2012).

In 2012, the Board adopted Wildlife Proposal WP12-25, which added an additional nine days to the beginning of the fall caribou season in all of Unit 13 to provide more opportunity to federally qualified subsistence users. The season was extended from Aug. 10–Sep. 30 to Aug. 1–Sep. 30 (OSM 2012).

In fall 2016, the Board acted on Wildlife Special Action WSA16-05 to delegate authority to the BLM Glennallen Field Office Manager to open a ten-day caribou season within the 20-day period of October 1 through October 20 should caribou from the NCH be present on Federal public lands. WSA16-05 was approved to allow increased harvest of the NCH, whose population was above State management objectives and to provide additional hunting opportunity for federally qualified subsistence users as fall harvest was low due to caribou being inaccessible during the regular hunting season because of delayed migration (OSM 2016).

In 2018, Wildlife Proposal WP18-19 was submitted by the Ahtna Intertribal Resource Commission (AITRC) requesting they be allowed to distribute Federal registration permits to Ahtna tribal members for the Federal caribou season in Unit 13. In addition, the proponent requested that the Ahtna Advisory Committee (which was to be formed) be added to the list of agencies and organizations consulted by the BLM Glennallen Field Office Manager, when announcing the sex of caribou taken in Units 13A and 13B each year. The Board voted to defer WP18-19 pending development of a framework for a community harvest system (OSM 2018).

In 2018, ADF&G issued four EOs for the NCH in Unit 13. In response to high overwinter mortality, emigration to the Fortymile Caribou Herd (FCH), and lower than anticipated productivity, the NCH was reduced to approximately 35,700 caribou, which is near the lower end of the management objective. EO 04-02-18 changed the harvest limit from one caribou to one bull and established the three-day reporting requirement. EO 04-04-18 closed the State Tier 1 NCH hunt, RC561, on August 18, 2018, as reported harvest was approaching the harvest quota. EO 04-05-18 closed drawing hunt DC485 on August 26, 2018, to ensure not exceeding the quota of 250 bulls set for that hunt. EO 04-07-18 closed all NCH winter hunts as the harvestable surplus was taken during the fall hunting seasons.

In July 2019, the Board rejected Wildlife Special Action WSA19-03, which requested closure of Federal public lands in Unit 13 to caribou and moose hunting by non-federally qualified subsistence users for the 2019/20 season. The Board determined a closure was not warranted for conservation, continuation of subsistence uses, or safety reasons, as these populations were routinely monitored, and annual biological data was used to inform management plans and to establish sustainable harvest guidelines. Federal harvest rates remained consistent compared to annual overall harvest rates and the Board believed the closure would not alleviate public safety concerns as non-federally qualified subsistence users would still be able to cross Federal public lands to access State and private lands.

In September 2019, ADF&G issued EO 04-09-19 to extend the season for all State caribou hunts in Unit 13 by ten days from September 20 to September 30. The EO was issued to reduce the NCH population, which had grown to more than 53,000 animals, well above the upper end of the population objective for the herd.

In 2020, the Board adopted several proposals and special actions affecting caribou in Unit 13. First, in April the Board adopted deferred proposal WP18-19 with modification, establishing a community harvest system for moose and caribou in Unit 13. It also named eight individual communities within the Ahtna traditional use territory that are authorized to harvest caribou and moose in Unit 13 as part of the community harvest system, subject to a framework established by the Board under unit specific regulations.

In July 2020, the Board acted on two Wildlife Special Action requests regarding caribou hunting in Unit 13, WSA20-01 and WSA20-03. WSA20-01 requested a continuous caribou season in Unit 13 from Aug. 1-Mar. 31 and that the harvest limit in Unit 13, remainder be changed from two bulls to two caribou for the 2020/21 and 2021/22 seasons. The Board approved the change in harvest limit to provide additional subsistence opportunity because there was no conservation concern. However, they did not approve the continuous season due to concerns of harvesting bulls during the rut when they may be unpalatable. This action was consistent with the Southcentral and Eastern Interior Subsistence Regional Advisory Councils' recommendations.

WSA20-03 requested closure of Federal public lands in Unit 13 to the hunting of moose and caribou by non-federally qualified subsistence users for the 2020/21 season. The Board approved closure of Federal public lands in Units 13A and 13B only to moose and caribou hunting by non-federally qualified subsistence users for the 2020/21 and 2021/22 seasons. The Board supported the closure due to its necessity for reasons of public safety and continuation of subsistence uses. The Board limited the closure to Units 13A and 13B because this is the area where the most overcrowding, disruption of hunts, and serious safety concerns have occurred. The Board extended the special action to the 2021/22 season as a regulatory proposal would not become effective until July 1, 2022, which reduced the administrative burden associated with processing additional requests.

Also in July 2020, the Board approved Wildlife Special Action WSA20-02 with modification regarding the AITRC administered community harvest system. AITRC submitted WSA20-02 to effectively and immediately implement the community harvest system that the Board had approved in April 2020 (via

adoption of deferred WP18-19). In January 2021, the Board approved a community harvest system framework, which was required to implement the system, as part of its adoption of WSA20-07. This special action addressed a regulatory inconsistency that prevented the community harvest system from being effectively implemented. In April 2022, the Board adopted Wildlife Proposal WP22-36, which codified these temporary regulations in the Code of Federal Regulations.

In 2022, ADF&G took action to decrease a steep population decline by changing harvest limits. Severe winter conditions resulted in a low population estimate with a lower-than-expected harvestable surplus. ADF&G established the resident caribou harvest limit in Unit 13 as one bull only, with a harvestable surplus of 1,000 bull caribou (615 allocated to State harvest and 385 for Federal harvest). ADF&G requested the BLM to restrict harvest to bulls only, which the BLM decided not to do. These low harvest quotas led to both State registration hunts being closed by EO when quotas were exceeded. Reported Federal harvest under permit FC1302 for the fall and winter seasons was a total of 162 caribou, 112 bulls and 50 cows. On June 30, 2023, the State announced the closure of all NCH hunts for the 2022/23 season via EO R4-01-23. This EO closed the two Tier I registration hunts (RC561 and RC562) and the community subsistence hunt (CC001). The resident youth hunt (YC495) and resident drawing hunt (DC485) were not offered during the drawing application period of 2022 (ADF&G 2022), as ADF&G determined the NCH population was too low to offer these opportunities.

Biological Background

The NCH calving grounds and summer range lie within Unit 13. The rut also generally occurs within Unit 13 from late September through mid-October. About 60-95% of the NCH overwinters in Unit 20E, although Nelchina caribou also overwinter in Unit 12 and across northern portions of Units 11 and 13 (Schwanke and Robbins 2013). Winter competition with the FCH in Unit 20E may be impacting the NCH and range conditions. While the calving season and location of the NCH calving grounds remains static, use of other seasonal ranges varies with resource availability and snow cover (Schwanke and Robbins 2013).

State management goals and harvest objectives are based on the principle of sustained yield (Robbins 2014). Since the 1990s, ADF&G has aimed to maintain a fall, post-hunt population of 35,000–40,000 caribou, with minimum ratios of 40 bulls:100 cows and 40 calves:100 cows (Hatcher and Robbins 2021). The goal is to provide for the harvest of 3,000–6,000 caribou annually.

The State manages the NCH for maximum sustained yield, principally by annual adjustments in harvest quotas. The population of the NCH has fluctuated over time, influenced primarily by harvest (Schwanke and Robbins 2013). Between 2003 and 2022 the NCH summer population estimate ranged from 21,000–53,500 caribou and averaged 39,361 caribou (**Table 1**). However, many times the herd has exceeded State population objectives and harvest regulations have been liberalized to quickly reduce the population in an effort to preserve habitat conditions. Reduced predation resulting from intensive wolf management programs intended to benefit moose in Unit 13 and the FCH in Units 12 and 20 may have contributed to NCH population increases (Schwanke and Robbins 2013; ADF&G 2017a, 2019a). The predator control program has been active in Unit 13 since 2000 (ADF&G 2023c). Activity under the program was

suspended during 2012, 2015–2017, and 2019–2021, all coinciding with population estimates at or above management objectives (ADF&G 20223c).

Following a period of higher-than-expected population and an associated liberalized harvest period from 2010–2017, in October 2018, the NCH was estimated to be only 33,229, which is below the minimum State population objective (**Table 1**). A combination of a liberal hunt, severe winter conditions in the eastern part of their range that resulted in high over-winter mortality, emigration of some animals to the FCH, and lower than anticipated productivity reduced the NCH from the previous year's fall estimate of 41,411 (Rinaldi pers. comm. 2019). In the summer of 2019, the NCH minimum population increased to the highest estimate of 53,500 caribou (ADF&G 2019b). However, by October 2019, the population estimate had fallen to 46,528 caribou and has since declined to the summer 2022 estimate of 21,000 caribou and the fall 2022 estimate of 17,433 caribou (**Table 1**), which is the lowest estimate since 2003 (ADF&G 2023a, 2023b). Factors contributing to this decline include deep snow across the range of the NCH during the winter of 2021–2022 leading to increased adult mortality. Spring thaw was also late that year delaying green-up, migration, and calving, which led to low calf recruitment. Preliminary indicators suggest difficult winter conditions for 2022–2023 led to poor recruitment again. Smaller cohorts over the last two years have the potential to slow population growth and recovery for the NCH (ADF&G 2023b).

Bull:cow and calf:cow ratios have also fluctuated greatly over time. Between 2003 and 2021, the fall bull:100 cow ratio ranged from 24–64 bulls:100 cows and averaged 42 bulls:100 cows. The fall calf:100 cow ratio for the same timeframe ranged from 19–55 calves:100 cows and averaged 39 calves:100 cows (**Table 1**).

Table 1. Population estimates and composition metrics of the NCH (ADF&G 2008, 2010a, 2018, 2019a, 2023a, 2023b; Hatcher 2021, pers. comm.; Rinaldi 2019, pers. comm.; Robbins 2015, 2016a, 2016b, 2017, pers. comm.; Schwanke and Robbins 2013; Schwanke 2011; Tobey and Kelleyhouse 2007). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

Year	Total bulls:100 cows ^a	Calves:100 cows ^a	Summer Herd Estimates ^b	Fall Herd Estimates
2003	31	35	31,114	30,141
2004	31	45	38,961	36,677
2005	36	41	36,993	36,428
2006	23 ^c	40 ^c	-	-
2007	34	35	33,744	32,569
2008	39 ^c	40 ^c	-	33,288 ^c
2009	42	29	33,146	33,837
2010	64	55	44,954	48,653
2011	58	45	40,915	41,394
2012	57	31	46,496	50,646
2013	30	19	40,121	37,257
2014	42	45	-	-
2015	36	45	48,700	46,816
2016	57	48	46,673	46,673
2017	35 ^c	35 ^c	-	41,411 ^c
2018	40	20	35,703	33,229
2019	32	41	53,500	46,528
2020	28 ^c	17 ^c	-	35,000 ^c
2021	38	45	38,400	35,500
2022	26	16	21,000 ^c	17,433 ^c
Average	42	39	39,361	39,739

^a Fall composition counts

^b Summer photocensus

^c Modeled estimate

Harvest History

The NCH is a popular herd to hunt and experiences heavy harvest pressure due to its road accessibility and proximity to Fairbanks and Anchorage. Harvest quotas are adjusted annually to achieve State management objectives and keep the herd from growing to unsustainable levels (Schwanke and Robbins 2013). In recent years, caribou have been largely unavailable on Federal public lands during the fall Federal season (Aug. 1– Sep. 30) with their presence peaking during October when the season is closed for the rut (BLM 2020; OSM 2023b).

Over 95% of total NCH harvest occurs in Unit 13. Between 2001 and 2022, harvest from the NCH under State regulations ranged from 519–5,785 caribou/year (**Table 2**). Over the same period, caribou harvest under Federal regulations in Unit 13 ranged from 102–610 caribou/year (**Table 2**). Federal harvest (FC1302) accounts for 14% of the total Unit 13 caribou harvest on average. Fluctuations in Unit 13 caribou harvest follows changes in abundance and population estimations.

On August 3, 2018, the State issued EO 04-02-18, which reduced the quota to 1,400 bull caribou, noting that additional Federal harvest could be taken sustainably while allowing for modest growth and subsistence opportunity (ADF&G 2018). In 2018, caribou were largely unavailable during the fall Federal subsistence hunt (Hankins 2019), a trend that continues through today with the migration of the NCH typically falling between Federal seasons (OSM 2023b). Federal FC1302 permits issued from 2019–2022 average 2,746, which is comparable to the overall average since 2001 of 2,762 (**Table 3**). Reported Federal harvest for 2022/23 of 142 caribou was much lower than the long term 2001–2022 average of 371 (OSM 2023b). The 2022 Federal subsistence harvest was lower than in recent years, which may be because of lower abundance of caribou or because they migrated through Federal public lands during October when the season was closed.

Between 2001 and 2022, the number of Federal subsistence hunters and harvest success rates for the FC1302 hunt have shown substantial annual variation (**Table 3**). Between 2003 and 2012, Federal subsistence hunter numbers and success rates averaged 1,353 hunters and 31%, respectively. Between 2013 and 2022, Federal subsistence hunter numbers and success rates averaged 1,219 hunters and 25%, respectively. Success rates for caribou harvest depend largely on caribou availability (a function of migration timing) rather than abundance, and availability likely explains some of the substantial annual variation. Of note, federally qualified subsistence users may also harvest under State regulations, and those harvests are not reflected in the data above or in Table 3. The data described above and in Table 3 only considers harvests under Federal regulations (FC1302).

Table 2. Harvest amount of Nelchina caribou in Units 13. Showing amounts of State harvest quota, State harvest, and Federal harvest (Schwanke and Robbins 2013; Tobey and Kelleyhouse 2007; OSM 2023b; Robbins 2015, 2017, pers. comm.; WinfoNet 2019; BLM 2020). Unit 12 harvest shown for winter may be announced season. FC1202 harvest does not apply to harvest quota set by ADF&G.

Regulatory Year	Harvest Quota	State Harvest	Federal Harvest (FC1302)	Total Unit 13 Harvest
2001		1,479	498	1,977
2002		1,315	337	1,652
2003		995	322	1,317
2004		1,226	335	1,561
2005		2,772	610	3,382
2006		3,043	570	3,613
2007		1,314	385	1,699
2008		1,315	273	1,588
2009		753	349	1,102
2010	2,300	1,899	451	2,350
2011	2,400	2,032	395	2,427
2012	5,500	3,718	537	4,255
2013	2,500	2,303	279	2,582
2014	3,000	2,712	237	2,949
2015	5,000	3,402	595	3,997
2016	N/A ^a	5,785	491	6,276
2017	6,000 ^b	4,529	358	4,887
2018	1,400 ^c	1,411	370	1,781
2019	3,450	2,735	102	2,837
2020	5,090 ^d	3,770	306	4,076
2021	1,250 ^d	1,505	220	1,725
2022	615 ^d	519	162	681

Table 3. The number of permits issued, permits used, caribou harvested, and harvest success rates for the FC1302 Federal caribou hunt (OSM 2023b).

Regulatory Year	Permits Issued	Hunted	Harvest	Success Rate (%)
2001	2,565	1,469	498	33.9
2002	2,507	1,379	337	24.4
2003	2,574	1,240	322	26.0
2004	2,555	1,337	335	25.1
2005	2,557	1,499	610	40.7
2006	2,631	1,317	570	43.3
2007	2,399	1,092	385	35.3
2008	2,532	1,229	273	22.2
2009	2,576	1,339	349	26.1
2010	2,852	1,535	451	29.4
2011	2,980	1,425	395	27.7
2012	2,953	1,518	537	35.4
2013	2,781	1,303	279	21.4
2014	2,943	1,395	237	17.0
2015	3,061	1,560	595	38.1
2016	3,154	1,533	491	32.1
2017	3,071	1,526	358	23.5
2018	3,082	1,433	370	25.8
2019	2,787	900	102	11.3
2020	2,916	1,195	306	25.6
2021	2,606	945	220	23.3
2022	2,676	396	142	35.9
Average	2,762	1,298	371	28.3

Cultural Knowledge and Traditional Practices

Most of Unit 13 falls within the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981, Simeone 2006, ADF&G 2017b). Archaeological evidence and historical accounts indicate that caribou have been a primary subsistence resource for the Ahtna, who have hunted caribou seasonally in the spring and fall for generations (de Laguna and McClellan 1981, Simeone 2006, ADF&G 2017b). De Laguna (1981) reported that within Ahtna territory, caribou and moose were caught either in drag-pole snares or in snares set 200-300 feet apart in long brush fences. Caribou were also hunted with the use of spears from skin boats, and later, guns were used for both caribou and moose hunting (de Laguna 1981, Reckord 1983). The traditional practices of drying and freezing meat, as well as the proper and respectful treatment of harvested resources such as caribou, are described in several ethnographic accounts of the Ahtna and people of the upper Tanana (de Laguna and McClellan 1981, Reckord 1983, Simeone 2006, Haynes and Simeone 2007).

Caribou continue to be vital resources for residents of the Copper River and Tanana watersheds (Kukkonen and Zimpleman 2012, La Vine et al. 2013, La Vine and Zimpleman 2014, Holen et al. 2015). ADF&G's Division of Subsistence conducts household subsistence harvest surveys periodically throughout rural Alaska. Though this survey data is only available for some communities in some years, it is an important source for documenting patterns of resource use. In the most recent comprehensive subsistence surveys conducted in the region by ADF&G between 2009 and 2013, large land mammal harvest accounted for 17% to 60% of communities' total subsistence harvests by weight (Kukkonen and Zimpleman 2012, La Vine et al. 2013, La Vine and Zimpleman 2014, Holen et al. 2015). While bear, sheep, goat, and bison were also taken, most of the large land mammal harvest was composed of caribou and moose for all communities surveyed (Kukkonen and Zimpleman 2012, La Vine et al. 2013, La Vine and Zimpleman 2014, Holen et al. 2015). Surveys reported that harvests of large land mammals by communities in the Copper River Basin ranged from approximately 11 pounds per person in Mendeltna, to 121 pounds per person in Mentasta Pass (La Vine et al. 2013). In some communities in the region, large land mammal harvests surpassed those of fish (Kukkonen and Zimpleman 2012, La Vine et al. 2013, La Vine and Zimpleman 2014, Holen et al. 2015).

During each study year between 2009 and 2013, communities within the Copper River Basin harvested or hunted for caribou in Units 13, as well as in nearby Units 11 and 12 (Kukkonen and Zimpleman 2012, La Vine et al. 2013, La Vine & Zimpleman 2014, Holen et al. 2015). Harvest and search areas specific to communities within Unit 13 illustrate a pattern of hunting along nearby road corridors and locations close to home (Kukkonen et al. 2012, La Vine et al. 2013, La Vine & Zimpleman 2014, Holen et al. 2015). Some communities described hunting primarily along road corridors, while others noted that their caribou harvest and search areas extended throughout the basin (Kukkonen et al. 2012, La Vine et al. 2013, La Vine & Zimpleman 2014, Holen et al. 2015). Significantly, even in communities that reported no harvest for their study year, caribou were still widely used, shared, and received (Holen et al. 2015). For example, while Tolsona reported no caribou harvest during the 2013 study year, 25% of Tolsona households still reported using caribou (Holen et al. 2015).

User conflict between local and non-local caribou hunters has long been an issue in Unit 13 (Holen et al. 2015, SCRAC 2015). Recent subsistence research, technical papers, and public testimony at Board special action hearings, Regional Advisory Council meetings, and Board sessions have provided a record of public sentiment on increasing issues of hunting pressure and competition in the area (SCRAC 2015).

Household subsistence surveys conducted between 2009 and 2013 also documented local concerns about issues of user conflict regarding access to, and competition for, key subsistence resources (Holen et al. 2015). Many communities in the region had concerns about the amount of caribou and other large land mammal harvest taken by non-local hunters (Holen et al. 2015). Some residents argued that most of the meat harvested in Unit 13 is not eaten by residents of the region (Holen et al. 2015). Others added that non-local hunters were out-competing locals and driving game away (Holen et al. 2015). Many communities surveyed from 2009 to 2013 noted that better-equipped urban hunters, traffic pressure on the roads, and significant increases in the use of off-road vehicles were decreasing the success rates and efficiency of federally qualified subsistence users by interfering with access to favored hunting areas and driving game further from road corridors (Holen et al. 2015). A Paxson resident explained:

ATV use is out of control in the Denali Highway area. There is just too much motorized access. Local subsistence hunters cannot compete with those people that come into this area with lots of equipment like motorhomes and 4-wheelers or 6-wheelers (Holen et al. 2015: 258).

Some local community members have also noted that changing climatic conditions are complicating more traditional large land mammal hunting practices in the area, as warmer weather is extending longer into the hunting season and altering the timing of yearly biological cycles and herd migrations (Kukkonen and Zimpelman 2012; La Vine et al. 2013; La Vine and Zimpelman 2014, Holen et al. 2015).

Effects of the Proposal

If this special action is approved by the Board, there will be no harvest of caribou from the NCH on Federal public lands in Unit 13 by any users for the fall 2023 season, including harvest under Federal registration permit FC1302 or the AITRC administered community harvest system. This will be a major reduction in resources available to federally qualified subsistence users. However, extreme winter conditions and delayed spring conditions during the winter of 2021/22 led to high overwinter mortality and lower recruitment rates for the NCH resulting in lower population estimates for 2022/23. Similar conditions and mortality during the winter of 2022/23 are expected to lead to even lower population estimates in 2023. The latest fall estimate of 17,433 caribou is about half of the lower extent of the population management objective set by ADF&G.

A closure in Unit 13 to caribou hunting may lead to an increase of GMU 13 hunters, both federally and non-federally qualified subsistence users, traveling to other regions to harvest caribou. This may result in more users moving to the Upper Tanana to hunt the Fortymile caribou herd in Unit 20. While only federally qualified subsistence users from Unit 20 have customary and traditional use determination for the Fortymile caribou herd, with the concurrent closure on state lands in Unit 13, if both State and Federal public lands are open in Unit 20, this may attract all users to hunt there.

While this restriction would eliminate a much relied upon natural resource of federally qualified subsistence users, the major reduction in harvest may conserve the NCH and aid in its recovery. Any population increase may provide for more subsistence opportunity in the future.

OSM CONCLUSION

Support Wildlife Special Action WSA23-01/03.

Justification

Conservation concerns warrant a closure to caribou hunting on Federal public lands in Unit 13 by all users. Constant hunting pressure, low recruitment rates, and severe weather conditions causing higher than usual mortality have led to a major decline in NCH population. Supporting WSA23-01 may facilitate recovery of the NCH by allowing the remaining animals to stay in the population and add to the productivity and recruitment of the herd. With ADF&G closing all State caribou seasons in Unit 13, closing the Federal fall season will protect the remaining caribou in the NCH and may ensure continued viability of the NCH.

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THE STATE
of **ALASKA**
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July 3, 2023

Mr. Anthony Christianson
Federal Subsistence Board, Chair
1011 East Tudor Road
Anchorage, Ak 99503

Chair Christianson:

As you are aware the Alaska Department of Fish and Game (department) recently issued an Emergency Order with accompanying Advisory Announcement (attached) closing all Nelchina caribou hunts under state regulations in Game Management Unit (GMU) 13. This letter is a request that the Federal Subsistence Board close all Nelchina caribou hunts on federally managed land in GMU 13 for conservation purposes. Such closure is authorized by Section 816(b) of ANILCA "to assure the continued viability" of the Nelchina caribou herd, following consultation with the department. We request an immediate closure for sixty days under an emergency special action, followed by a longer-term closure under a temporary special action for the entire 2023-2024 season.

In the fall of 2022, the Nelchina caribou herd was estimated at 17,433 animals with a bull:100 cow ratio of 26 (objective 40:100) and a calf:100 cow ratio of 16 (objective 40:100). The herd experienced severe winter conditions (i.e., deep snow, early and persistent snow, high precipitation) in the winters of 2021/22 and 2022/23, followed by late spring, coinciding with late migration and a late calving period. Overwinter mortality of adults and calves was high, resulting in a reduction in overall population numbers and low recruitment of the 2021 and 2022 calf cohort into the population; 87% of the collared 2022 calf cohort died prior to spring. Productivity and recruitment for 2021–2023 has not been sufficient to grow the herd with the unusually high levels of mortality that have been observed. Additional caribou abundance surveys will be conducted in July 2023 but at this time there is no harvestable surplus.

There is public support for closing all Nelchina caribou hunts. In February, Ahtna Incorporated requested a closure of all Nelchina caribou hunting until the herd recovers to within the State's population objectives. In addition, we have consulted with Ahtna Inter-Tribal Resource Commission and understand they intend to make a similar request to close any federal hunt to allow the herd to recover to a sustainable level. Because of the action taken by the department,

permittees of Tier I and Community Subsistence caribou hunts will be released from the permit condition limiting their caribou hunting to GMU 13.

Thank you for your time and consideration of this request. If you or your staff have any questions, please contact Ryan Scott at (907) 465-4191 or email ryan.scott@alaska.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Lang", written in a cursive style.

Doug Vincent-Lang
Commissioner

Cc: George Pappas- State Subsistence Liaison, Office of Subsistence Management, US
Department of the interior
Ben Mulligan- Deputy Commissioner, Department of Fish and Game, State of Alaska
Mark Burch- Wildlife Biologist, Division of Wildlife Conservation, Department of Fish
and Game, State of Alaska

Karen Linnell, Executive Director
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Requested Special Action:

We request an Emergency Special Action to close hunting of the Nelchina Caribou Herd by all users on Federal public lands in Game Management Unit 13 (Unit 13) for the 2023 fall hunt to assure the continued viability of the Nelchina Caribou Herd. Such a closure is authorized by 816(b) of ANILCA and under 50 CFR 100.19(a). The relevant regulations are as follows:

Existing Federal Regulation

Unit 13—Caribou

<i>Units 13A and 13B—2 caribou by Federal registration permit only (FC1302). The sex of animals that may be taken will be announced by the Glennallen Field Office Manager of the Bureau of Land Management in consultation with the Alaska Department of Fish and Game area biologist and Chairs of the Eastern Interior Regional Advisory Council and the Southcentral Regional Advisory Council</i>	<i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i>
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<i>Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)</i>	<i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i>
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Proposed Federal Regulation

Unit 13—Caribou

<i>Units 13A and 13B—2 caribou by Federal registration permit only (FC1302). The sex of animals that may be taken will be announced by the Glennallen Field Office Manager of the Bureau of Land Management in consultation with the Alaska Department of Fish and</i>	<i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i>
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~~Game area biologist and Chairs of the Eastern Interior Regional Advisory Council and the Southcentral Regional Advisory Council~~
Federal public lands are closed to the taking of caribou for the 2023 fall season for non-Federally qualified users and Federally qualified subsistence users.

~~Unit 13, remainder—2 bulls by Federal registration permit only
(FC1302)~~

~~Aug. 1–Sep. 30
Oct. 21–Mar. 31~~

Federal public lands are closed to the taking of caribou for the 2023 fall season for non-Federally qualified users and Federally qualified subsistence users.

Reason for the Action:

There is no harvestable surplus of Nelchina Caribou available, and any hunt could have a significant adverse effect on the health of the population. The Alaska Department of Fish and Game (ADF&G) has established fall population objectives for the Nelchina Caribou Herd of 35,000-40,000 individuals, with a calf to cow ratio of 40:100 and a bull to cow ratio of 40:100. In a June 8th communication from ADF&G to Marnie Graham, BLM Glennallen Field Manager, the fall 2022 caribou population estimate showed 17,433 animals, the calf to cow ratio was 16:100, and the bull to cow ratio was 26:100. Although the population fluctuates from year to year, the fall 2022 estimate represents a 50% decline from the 2021 population estimate. This, combined with the low calf:cow and low bull:cow ratios suggest the Nelchina Caribou Herd is under stress and a closure to all users for the fall season is warranted to ensure the continued viability of this population. On June 30th, 2023, ADFG informed BLM there were low birth rates and poor neonate survival on the 2023 calving ground, which further supports our request for a closure.

During a consultation with the Ahtna Intertribal Resource Commission (AITRC) on June 28, 2023, AITRC expressed full support for a moratorium on hunting Nelchina Caribou in Unit 13 until the population recovers. On July 6, 2023, BLM met with the Eastern Interior Alaska and Southcentral Subsistence Regional Advisory Council Chairs. All parties were supportive of an emergency closure. On June 30, 2023, we were made aware that ADF&G had closed the State caribou RC561, RC562 and CC001 hunts in Unit 13 for the 2023-2024 regulatory year by Emergency Order (R4-01-23).