



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Alaska Board of Game**

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July 25, 2023

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

Dear Chair Christianson:

The Alaska Board of Game is fully aware that the Alaska Department of Fish and Game (department) recently issued an Emergency Order closing all Nelchina caribou hunts under state regulations in Game Management Unit (GMU) 13.

This letter is a request that the Federal Subsistence Board (FSB) close all Nelchina caribou hunts on federally managed land in GMUs 11, 12, and 13 for conservation purposes and to assure the continued viability of the herd. The most recent survey indicates there is no harvestable surplus of Nelchina caribou at this time. Any harvest of Nelchina caribou will negatively affect the future health of the herd and delay any potential growth and resumption of subsistence use opportunity. ANILCA Title VIII Sec. 801(3), 802(1)(3), 804, 815(1), and 816(b) all direct the Secretaries to close harvest opportunities when necessary to "assure the continued viability" of resources for continued subsistence uses.

The State of Alaska has taken the necessary step to curtail harvest from the core Nelchina Herd consistent ". . .with recognized scientific principles. . ." It is only reasonable that the federal system cooperates as per Sec. 802(3) with the State management agencies. Chair Christianson and members of the FSB, this an opportunity for both boards to work cooperatively as mandated in ANILCA Sec. 802 (3) to ensure the sustainable and continued viability of the Nelchina caribou herd for future uses.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jerry Burnett".

Jerry Burnett, Chair  
Alaska Board of Game

cc: Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game  
Ryan Scott, Deputy Director, Div. of Wildlife Conservation, Alaska Department of Fish and Game  
Sue Detwiler, Asst. Regional Director, Office of Subsistence Management, US Department of the Interior  
George Pappas, State Subsistence Liaison, Office of Subsistence Management, US Department of the Interior