



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

Office of the Commissioner
Headquarters Office

1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526
Main: 907.465.6136
Fax: 907.465.2332

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,



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