ACR #1 – Establish an Intensive Management (IM) program specific to Nelchina caribou in Unit 13.

SUBMITTED BY: Robert Cyr

CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.

5 AAC 92.121. Intensive Management Plans V.

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.

There is no Intensive Management (IM) program specific to Nelchina caribou in Unit 13, despite being an IM animal in an IM unit and being well below population objectives. The Nelchina caribou herd decreased to under 8,000 animals during a 3-year period of heavy snow and late springs. Although the herd is recovering, it is still at about half of the minimum population objective. The herd still has a long way to go to meet the minimum population objective of 35,000 animals. The Copper Basin Advisory Committee put in a proposal during the last Central/Southwest Region meeting (Jan 2024) for an IM program that includes Nelchina caribou but were given poor direction by ADF&G staff and authored a proposal to add caribou to the moose IM program. A couple months later, in their comments to the BOG, ADF&G said that caribou could not be added to the current moose program, and that they had to be separated. Regardless, the Board of Game directed ADF&G to author a new caribou IM feasibility study for Unit 13 caribou. ADF&G has had 22 months and at least 2 opportunities to introduce the new feasibility study to the public and the BOG, but that has not happened yet. Every year that goes by could delay the full recovery of the herd (to the population objective range) by a year or more. We have been blessed with some mild winters recently, and we hope for more, but we, and the Department, should not solely rely on hope. I understand that the majority of the herd overwintered in subunit 13A last year with acceptable survival but believe previous IM efforts in RY 23 and 24 contributed to this. No IM was conducted in 13A last winter (RY 25), and that is concerning for future years if wolf numbers increase and IM is not implemented where the caribou live. These caribou need more continuous and comprehensive IM practices to get them to the population objective. A Nelchina caribou herd habitat issue narrative was pushed for many years by ADF&G and staff expressed interest to slow the growth of the herd, but caribou metrics did not support this assertion, and it's time to promote the continued growth of the herd in all ways possible.

WHAT SOLUTION DO YOU PREFER?

Adopt a new IM program specific to Nelchina caribou, that would be authored by ADF&G.

STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:

The Nelchina caribou herd is currently at about half of its minimum population objective and IM was not conducted in RY 25 where the majority of the herd wintered in, gave birth in, and summered in. The IM program was suspended in 13A during RY 25 because the moose population increased above

objectives. If there is no IM where caribou reside (some winters, almost all summers, and even migratory corridors), the herd will be negatively impacted, slowing its growth. Habitat is not a limiting factor, so let's keep the growth momentum going by reducing predation potential.

1) **To correct an error in regulation.**

2) **To correct an effect of a regulation that was unforeseen when a regulation was adopted.**

3) **Does the request identify a biological concern for the population or a threat to meeting objectives for the population?**

   Yes, the cessation of IM in critical parts of Unit 13 (e.g., 13A) will delay the full recovery of the herd by up to several years. We still need another 15,000+ caribou to reach the minimum population objective.

4) **Does the request identify an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f)?**

   It will speed up the recovery timeline for reasonable harvest opportunities.

5) **Does the request identify an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome because the resource would be unavailable in the future?**

   Not implementing IM where the caribou herd resides ASAP will slow the recovery and reduce future harvest opportunities.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Herd growth to the population objective range could be comprised and potentially delayed by a year or more.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

Because it is 100% biological.

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.

I am the Vice Chair of the Copper Basin AC and an avid hunter that has subsistence hunted the Nelchina caribou herd with my family of six since 2004. The Nelchina caribou herd has been a constant for the residents of Unit 11, 12 13, as well as many resident families throughout Alaska. We need to utilize every tool to protect this vital resource. This herd recently decreased by 80%, habitat narratives have been pushed on us in lieu of IM, and it's been nearly two years since ADF&G was directed to author an IM feasibility study specific to Nelchina caribou. This needs to happen to override the highly flawed one from 2023. Stakeholders simply want the best opportunities in the toolbox for this herd to fully recover. This herd has been a staple food item for many Alaskans prior to the three consecutive bad winters.

STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING.

Yes, proposal 48 from the 10-17 January 2024 meeting. As previously stated, The Copper Basin AC was given bad advice by ADF&G and authored a proposal to add caribou to the current Unit 13 moose IM plan. Regardless, the BOG directed ADF&G to author a feasibility study almost two years ago now, and we are still waiting as the ACR deadline approaches.