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Alaska Wildlife Alliance Comments on 2024 Western Arctic/Western Regions Proposals

Proposal 2 - Support

We support the recommendations of the Western Arctic Caribou Herd Working Group. We agree that there is an immediate need to address the current herd decline by limiting the harvest of both bulls and cows to allow the herd population to begin to recover. An exemption from closing 26A may be warranted, due to the blending of the Teshekpuk, Central Arctic, and Western Arctic herds during the winter and spring months, but only 1) if the harvest of WAH caribou in 26A is minimal 2) harvest in 26A is of bulls. Without an the number of WAH caribou taken in 26A, we cannot confirm whether current harvest levels should remain in 26A, and encourage the Board to consider those nuances in their deliberation.

Proposal 3 - Support

We support the recommendation of the Western Arctic Herd Working Group. The decline of the WAH is alarming, and given the instability of habitat and winter conditions due to climate change, there is no guarantee the herd will not continue to decline even if potential harvest restrictions on resident hunters are implemented (proposal 2). If the amount of caribou available for harvest is not meeting the needs of subsistence and resident hunters then non-resident harvest should not be permitted.

Proposal 6- Support

While we recognize the proposal time period needs to be refined, we support a moratorium on Mulchatna Caribou Herd harvest due to the alarming decline of the herd. The most significant causes of mortality for this herd are human harvest, disease and nutritional concerns due to changes in habitat. We cannot easily control disease or mitigate the habitat changes, and there is already a robust predator control program in place that is expensive and almost certainly unlikely to have positive long term impacts given the known threats to the population. The remaining element of Mulchatna caribou recovery that can be controlled is human harvest. We support the current closed seasons and believe the season should remain closed until a proper population objective is established based on the evaluation of the region's carrying capacity. Furthermore the State should develop predictive models based on actual data to estimate population growth rates and refine potential future harvest objectives. Providing adequate law enforcement during season closures would also increase the potential for the herd to potentially rebound faster.

We recognize the impacts to subsistence harvesters if caribou hunting were closed by moratorium. As the area changes to host more shrubs and browse, moose are likely to continue moving in. Therefore, should the research divisions at ADFG find moose populations viable under increased harvest, we also support Proposal 7 in order to mitigate the impacts of the closed Mulchatna Herd season.

Proposal 7 - Support

So long as an extended session would not jeopardize the moose population in Unit 18, we support this proposal, particularly in light of the decline in the Mulchatna Caribou herd and the needs of local subsistence.

Proposal 13 - Oppose

We oppose this proposal for concern of overharvest, wanton waste, and unknown future impacts to muskrat populations and other wetland species. The largest harvest limit the Board has allowed was 50 per day and 100 in possession, but this regulation was reduced to 15 per day and 30 in possession due to reports from local residents that fewer ptarmigan were being observed and harvested since 2014. This reduction in bag and possession limits aligned federal and state regulations as the Federal Subsistence Board had reduced the bag and possession limit for ptarmigan in 2018 due to the same concerns. We believe that increasing the harvest and possession limit would be history repeating itself – dramatic harvest increases followed by future cuts. Further, cleaning Ptarmigan is extremely time consuming, and to ensure the entire use of the organs and extremities, we believe the current harvest and possession limits are feasible to utilize every part of the bird and still gather for subsistence. Finally, we encourage future study of this species by the ADFG to determine the impacts of climate change on populations and subsequently facilitate development of more informed regulations.

Proposal 16 - Oppose


We oppose this proposal based on the testimony of the ADFG (BOG meeting Spring 2022) where State biologists indicated that wolves were not the primary factor impacting the health of the Mulchatna caribou herd and advised the BOG to revisit the Intensive Management Plan for predators in the region. ADFG comments state that wolf abundance is high, yet provide no data to support that claim. The closest wolf data population we could find was from neighboring GMU17.


The wolf research project in Unit 17 was ended early because ADFG could not maintain a collared sample. Further, wolf control was started in Unit 17 before a baseline wolf population could be established. The best available guesses ADFG has on wolf population and distribution is from only 7 months of GPS data in the Mulchatna and lower Nushagak River drainages (17B).


The wide range of harvest, coupled with thin population data that is widely extrapolated, makes the situation in Unit 18 very murky. The Predator Control program is effective in removing wolves from the neighboring Wolf Control Area. Over the past decade, the BOG has liberalized the wolf seasons in neighboring units, and those efforts are less closely analyzed. Add on the liberalization of harvest in all neighboring units, and the Board is essentially enacting defacto predator control throughout the region.


We hope you will consider the situation of wolves in GMU18. The objective of the current IM program is to remove 100% of wolves from the WCA in 17B&C, 9B, and 19B (nearly 10,000 mi²). Liberalized trapping seasons extend past the mating season and into the denning season all around them in GMU 17, 19, 21 and 22. By ADFG's own admission, wolf predation is not a primary threat to Mulchatna recovery. Should the Board and ADFG find biological evidence to support an increase in wolf harvest, we may be amenable, but scapegoating wolves as the solution to Mulchatna caribou herd problem is unscientific. Killing all the wolves



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hasn't helped, and we encourage the Board to address the primary threats to Mulchatna caribou recovery before expanding yet another wolf harvest season.

Proposal 17 - Oppose

There has been no evaluation of the recent impacts to the brown bear population in the Unit 17/18 regions after the 2023 predator control operation by the ADFG that resulted in the harvest of 94 brown bears, including several year-old cubs and 11 first year cubs. We encourage ADFG not to extrapolate density estimates from Togiak research, and consider how much has/could have changed in the 20 years since those data were collected. Should ADFG report estimates of the percent of the brown bear population removed in 2023, they must justify the extent of their extrapolation *and* provide context for the Board to understand the range of uncertainty for those numbers. ADFG plans to continue further elimination of bears in the calving grounds through 2028. The proposal is premised on the need of increased bag limits to improve the long term health of the Mulchatna Herd. ADFG biologists encouraged an evaluation of the intensive management program in the 2022 report to the BOG, and stated that the primary factors impacting the Mulchatna Caribou population are human harvest, disease, and habitat changes that have resulted in nutritional stress (not bears or wolves). The long term sustainability of the brown bear populations in this region is currently unknown after the 2023 predator control measures. No population data is available to assess if further harvest of brown bears would be sustainable. Until brown bear populations are determined for the Unit 18, 17 regions, no additional harvest should be allowed to ensure that brown bear populations are maintained at sustainable levels.

Proposal 28 - Oppose

This proposal would make it challenging to regulate brown bear harvest in 22D and 22E. We also oppose an increase to nonresident brown bear hunters and recommend that the permits available for DB690 remain at 21. We acknowledge that the ADFG comments suggest increasing the DB690 permits to 40. Doubling the quota is a significant change, given that the area has been continuously liberalized over the past decade. If the Board desires to increase the BD690 permits, we recommend a more moderate increase based solely upon the quality of the best available bear population data to ensure there is no violation of sustained yield. There are no current bear population estimates for Unit 22D. The last population estimates were based on 1990 data. There has been tremendous change in conditions throughout Alaska since 1990 and new population estimates should be pursued before increasing harvests.

Proposal 29 - Oppose

We acknowledge the Department's recommendation to increase the DB685 permits to 40, but remind the Board that DB685 has historically been undersubscribed in the past ten years and only twice (RY15 and RY22) has the total number of permits been issued. DB685 has an average hunter participation of 74% and an average hunter success of 64% during the last 10 regulatory years (RY13-RY22). If the proponent seeks more nonresident hunting opportunity, the population must be able to withstand harvest levels and the existing 27 tags must be filled before expanding the permit allotment.

Proposal 30 - Oppose

By ADFG's admission "little is known about muskrat abundance since there are no surveys currently being conducted by the department." Without an understanding of muskrat abundance, we believe that a year-round season is unwarranted. We also encourage the Board to consider impacts to other species, such as birds, should a year-round season be permitted. If the Board approves of a year-round season, we strongly encourage a bag limit.

Proposal 36, 37, 38 - Support

We believe these proposals will initiate steps to recover the WAH.

Proposal 39, 40, 41 - Oppose

We oppose these proposals to open year-round harvest of Brown Bears. The purpose of these proposals is to facilitate de-facto predator control, without and research in to bear population and potential impacts to the species. The current season lengths and harvest quotas are sufficient to meet the needs for subsistence and resident hunters. If there are nuisance bears, the DLP permit allows for harvest.