



May 22, 2015

The Noatak and Kivalina Advisory Committee (proposer) has submitted an Agenda Change Request (ACR) to the Alaska Board of Game requesting to change 5 AAC 85.025(18) Hunting seasons and bag limits for caribou (ACR 2). Under the Board's ACR policy, the Board will accept an ACR only:

- A) for a conservation purpose or reason;
- B) to correct an error in a regulation; or
- C) to correct an effect on a hunt that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling. [5 AAC 92.005(a)(2-3)].

This ACR addresses caribou between subsistence and non-subsistence users.

With respect to ACR policy acceptance criteria:

- (A) The declining status of the WAH was addressed by the Board in March 2015 when new regulations, effective July 2015, were adopted to reduce harvest.
- (B) The department is unaware of an error in regulation that relates to this ACR.
- (C) The recent changes and variation in WAH migration pattern were fully considered when caribou season dates were established for resident and nonresident hunters in Unit 23 during the March 2015 board meeting.

The varying migration patterns of the WAH have made it more difficult for hunters from the communities of Noatak and Kivalina to access caribou during the fall hunting season. For generations, Inupiaq hunters have abided by a cultural tradition to allow the vanguard of the caribou migration to pass undisturbed to establish trails through an area so that more caribou will arrive by following the established trails. Residents of Noatak and Kivalina believe that the high density of nonlocal hunters in portions of the Noatak drainage is deflecting caribou away from traditional hunting areas because lead caribou are not able to create established trails.

During recent years, most of the WAH has migrated through the middle or upper Noatak drainage. Once transporters discovered this, they placed many of their clients in these areas, and, as noted in the ACR, densities of nonlocal hunters reached high levels compared to other portions of the WAH range.

Despite this high density of drop-off hunters, caribou continued to migrate through these areas each season, and also through these same areas in subsequent years. This suggests that the high density of nonlocal hunters combined with high levels of airplane activity may not have displaced caribou. This may be because the vanguard of the migration effectively established trails through these areas (each year) before transporters began placing clients in the area. Or, other unknown factors may be influencing migration patterns and fall distribution.

If a regulation were adopted that delayed caribou season until 1,000 caribou had crossed the Noatak River, it would be very difficult to effectively administer because we do not have a reliable means to count caribou in this localized area. Less than 1% of the WAH is radio collared and research shows that collared animals are rarely the leaders in the vanguard of a caribou migration. Nonlocal hunters who need to make airplane and hotel reservations, and who need to book guides or transporters months in advance, would have difficulty accommodating an uncertain season opening date. Finally, no single group of caribou establishes a trail that the rest of the herd follows during the fall migration. The vanguard of any caribou migration tends to occur over a broad swath, and caribou typically move through multiple movement corridors during each fall. It is unknown if allowing 1,000 caribou to pass through the upper Noatak drainage would ensure that migratory caribou would arrive close to the communities of Noatak and Kivalina.

The department recognizes the benefit of unimpeded migration of caribou to all hunters, both local and nonlocal, during the fall hunting season. However, implementing a delayed season opening based on passage of caribou is impracticable and may not reduce Noatak's difficulty in acquiring fall season caribou.

The department recommends this topic be considered by submitting a proposal for the next regularly scheduled meeting of the Arctic and Western Region in 2017.

Sincerely,



Bruce Dale  
Director  
Division of Wildlife Conservation