

INTERAGENCY STAFF COMMITTEE RECOMMENDATION

The Interagency Staff Committee recommendation is to **support** Temporary Special Action Request WSA19-05 **with modification** to allow the Izembek National Wildlife Refuge Manager to set the quota and season closure date for the harvest of up to four (4) bull caribou between August 15 to October 15, 2019 for residents of False Pass only.

The modified regulation should read:

Unit 10—Caribou

*Unit 10 Unimak Island—
Residents of Akutan, False
Pass, King Cove, and Sand
Point*

*Unit 10-Unimak Island only -1 bull by
Federal registration permit. Up to 4
caribou may be harvested. Season
closure date will be announced by
Izembek National Wildlife Refuge
Manager.*

*Aug. 15-Oct. 15
2019*

*Federal public lands are closed to the
taking of caribou except by residents of
False Pass.*

Justification

The Interagency Staff Committee (ISC) concurs with the OSM staff analysis' recognition of the importance of the continuation of subsistence uses of the Unimak Caribou Herd (UCH) by False Pass residents. As noted in the staff analysis, 2018 was the first harvest opportunity that has been allowed from UCH since 2009. Providing the 2018 opportunity to harvest three bull caribou allowed False Pass residents a chance to carry out customary and traditional practices and to pass cultural knowledge to the younger generation. Only residents of False Pass, as determined through the Section 804 subsistence user prioritization analysis, were eligible for this hunt. Harvest data from the period in which the UCH was open to harvest (1997-2009) shows the average harvest by Federal Registration permit was less than two animals per regulatory year. In 2018, four permits were issued and three bull caribou were reported harvested. Given the difficulty of accessing the area frequented by the herd, harvest is anticipated to remain low.

The regulatory flexibility provided to the in-season manager to issue a limited number of permits based on the health of the UCH continues to offer a conservative approach for providing harvest opportunity if additional herd health information is not available prior to announcing a season. As indicated in the staff analysis the tendency for the UCH to undergo wide fluctuations, the uneven age structure of the population, and population levels that are at approximately 40% of the lower threshold of 1,000 animals suggests caution (2018 minimum population count 418 animals). Although the UCH population may be on a positive trend, the population is still low, slow growing, and vulnerable to potentially wide

fluctuations. If four bulls are harvested from the State estimated 148 bulls (2018), then this accounts for three percent of the bull population. Given the current health status of the herd, the ISC suggests that the in-season manager consider additional 2019 caribou herd data, if available, prior to issuing permits to see if the population continues to show positive trends in the bull:cow and calf:cow ratios. The ISC also suggests that permits require that harvest is reported to the Refuge manager within two days to reduce the potential for over harvest. The ISC supports efforts to provide residents of False Pass an opportunity to harvest caribou while also conserving the resource.