

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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In Reply Refer To:
OSM.24050

APRIL 18 2024

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson:

I write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to share our concerns about management of the Fortymile Caribou Herd and to request that the Board take the steps necessary to convene the Fortymile Caribou Harvest Management Coalition (Coalition) and update the harvest management plan.

The Council held a public meeting on March 7, 2024, in Anchorage. Among the items discussed was the status of the Fortymile Caribou Herd and the herd's harvest management plan. In recent years, Fortymile caribou have significantly declined, and harvest opportunities have been reduced as a result. Subsistence users in our region are not meeting their needs for caribou; this is compounded by the on-going salmon crisis, low moose densities, growing competition for increasingly limited resources, and increasing costs of living. The Council has included Fortymile Caribou Herd management as an issue in our FY-2023 Annual Report, but decided to follow up with this letter in hopes that the Board might address our concerns in a more timely manner than through the Annual Report review process.

The 2019-2023 Fortymile Caribou Herd Harvest Management Plan is due for an update. It is typically updated every five years, but it expired in 2023, and the Council is not aware of any plans for it to be updated for 2024 onward. The Coalition has been a successful working group in the past, but in recent years has not been utilized as it should. The Fortymile Caribou Herd is a high profile, road accessible herd that has a lot of hunting pressure and has experienced significant declines in recent years. It is more important than ever to have an updated harvest management plan that accounts for the recent decline in herd size.

The Council wants to emphasize that the Coalition planning process is extremely important for bringing together many stakeholders, including federally qualified subsistence users, sport hunters, and also our Canadian neighbors. We strongly feel that it should not be left only to the Alaska Department of Fish and Game (ADF&G) to decide when the Coalition meets or to

develop or make changes to harvest strategies without consensus from the larger group of stakeholders. The U.S. Federal agencies involved in management of the Fortymile Caribou Herd, especially the Bureau of Land Management, need to take a more proactive role in the process of revising the Harvest Management Plan and in the on-going management of the herd. The Council asks the Board to support action by the pertinent Board agencies to convene a Coalition meeting and initiate an update of the Fortymile Caribou Herd Harvest Management Plan. A Coalition meeting needs to happen as soon as possible this year so an updated plan can be utilized to guide management actions of the collaborating agencies. A similar request has been submitted to ADF&G by the Eagle Advisory Committee (see enclosed).

Further, we feel that the Coalition should begin meeting on an annual basis similar to the Western Arctic Caribou Herd Working Group. This would more regularly bring together the diverse stakeholders that utilize and depend on the herd and continue to build and maintain the relationships between these user groups. Our Council has had a designated representative participate in past Coalition meetings and we wish for the Council to remain similarly involved with the Coalition into the future. We also request that representatives from Yukon-Charley Rivers National Preserve be invited to participate in future Coalition meetings; in the past they have been left out of this planning and management process.

Given the recent declines in the size of the herd and the uncertainties of climate change, the Council strongly recommends that a more conservative harvest strategy be implemented in the immediate future. The harvestable surplus needs to include a buffer to account for high mortality rates that result from extreme weather and other natural events. A harvest buffer should be used to prevent the entire harvestable surplus from being taken, leaving some additional animals to contribute to the reproductive pool and rebuilding of the herd.

One of the authorities given to the Council in Title VIII of ANILCA and our Council charter is to recommend strategies for the management of fish and wildlife populations within our region to accommodate subsistence uses and needs. We ask that the Board take our above recommendations to heart and work to implement them in hopes of improving collaborative management of this important subsistence resource and better meeting the needs of federally qualified subsistence users in our region.

The Council thanks you for considering our comments and looks forward to a timely response. If you have any questions or would like to discuss this further, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@fws.gov.

Sincerely,



Robert "Charlie" Wright, Sr.
Chair

Enclosure: Enclosure_Eagle AC Letter re Fortymile Coalition

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Field Manager, Eastern Interior Field Office, Bureau of Land Management
Superintendent, Yukon-Charley Rivers National Preserve
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record

**Eagle
Fish & Game Advisory Committee**

**Interior Region
Fish & Game Advisory Committees**

Andy Bassich
Chairperson
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Central	Middle Nenana River
Delta	Middle Yukon River
Eagle	Minto-Nenana
Fairbanks	Ruby
GASH	Stony Holitna
Koyukuk River	Tanana-Rampart-Manley
Lake Minchumina	Upper Tanana Fortymile
McGrath	Yukon Flats

April 16th, 2024

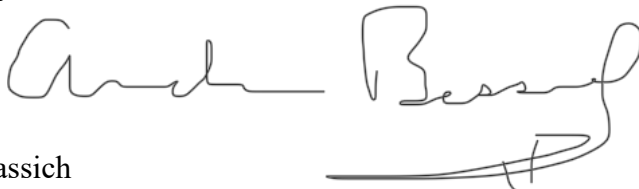
To: Fortymile Caribou Herd Harvest Management Coalition (HMC) Members (Anchorage, Central, Delta, Eagle, Fairbanks, and Upper Tanana/Fortymile Fish & Game Advisory Committees, Eastern Interior Regional Subsistence Advisory Council, Yukon Fish and Wildlife Management Board, Tr'ondëk Hwëch'in, Dawson District Renewable Resource Council, Bureau of Land Management (BLM), the Alaska Department of Fish and Game (ADFG), Yukon Department of Environment (YDE)), and the US Fish & Wildlife Service (USFWS) and National Park Service (NPS)

Subject: Calling for a meeting of the Fortymile Caribou Herd Harvest Management Coalition

Due to the reduction of the Fortymile Caribou herd over the past two years and the food security impacts to remote communities within the herd range who rely heavily upon this invaluable resource, we have identified this resource as a top priority to our community for immediate action. The Eagle Fish and Game Advisory Committee would like to call for a meeting of the Fortymile Caribou Herd Harvest Management Coalition (HMC) at the earliest date possible.

We formally request that ADFG along with BLM, USFWS and NPS facilitate a meeting with all coalition members (voting and non-voting), as soon as possible. Please contact ADFG Boards Support Section as well as all AC Chairs, and Federal Regional Advisory Councils (RACs), and other HMC members regarding meeting date planning.

Sincerely,



Andy Bassich
Eagle Fish & Game Advisory Committee Chair