

**Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic,
Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils**

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To:
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JULY 12 2024

Anthony Christianson, Chair
Federal Subsistence Board
1011 East Tudor Road, M/S 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

We write to you on behalf of the Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils (Councils) to share our concerns about caribou and request action from the Federal Subsistence Board (Board) to address these concerns. Additionally, we ask that the Board forward this letter to the Alaska State Legislature and Alaska congressional delegation for their awareness.

The ten Subsistence Regional Advisory Councils met during the All-Council Meeting March 5-8, 2024, in Anchorage, Alaska. Among the items discussed were multiregional concerns over the status of caribou. Many regions are witnessing population declines that are affecting the ability to harvest this important subsistence resource. In response, many of these herds have had regulatory action enacted on them that closed hunting seasons, and/or have had harvest limits dramatically reduced. The Councils are concerned about their communities as rural residents struggle to meet their subsistence needs and protect their traditional and cultural practices associated with this animal. Caribou are interwoven into Indigenous culture; caribou play an important role in spirituality and are a vital component to food security in many regions of the state.

Six Councils voted to raise their concerns over issues that are affecting herds health and population recovery. The Councils are observing disruptions to migration patterns, increased competition and pressure from sport hunters, larger predator populations, and climate change impacts. The Councils share concerns regarding population surveys, data sharing, and communication and collaboration with local stakeholders and request the Board address these issues.

1. Human activity has been observed to affect caribou migration patterns. Traditional knowledge from centuries of hunting and observing caribou demonstrates that lead

caribou create a path for other caribou to follow. The harvesting of the lead caribou can dramatically alter the migration of the entire herd. If the lead caribou's migration is diverted, the rest of the caribou will follow and move away from traditional hunting areas. If lead caribou, which are cows, are hunted from roads the caribou become trained to avoid any traffic. Lead cows that have experienced humans taking their members from the highway will subsequently train other members to avoid roads also. This is a deeply held hunting ethic of subsistence hunters and it is highly important to educate all hunters about letting the lead caribou pass. The Council requests continuing to educate the public on this practice.

Industrial development and activity negatively impact caribou. Oil field and mining roads create a barrier for caribou. Both research and local knowledge has shown that caribou are wary of crossing roads, which are preventing caribou from moving along traditional routes. Industrial development needs to consider infrastructure impacts on caribou and attempt to mitigate any negative impacts to traditional caribou movement patterns.

2. The impacts to caribou from sport hunting are also a concern shared by the Councils. Sport hunters generally target larger bulls, and this practice affects the genetic diversity of herds. Research indicates that large five-year-old bulls are the breeding component and have the fat reserves to breed cows during the very short estrous cycle of caribou and then survive through the winter. Mature, large bulls also produce strong calf cohorts. Younger, inexperienced bulls are rejected by cows who are waiting for large bulls to arrive. If large bulls are not available, adult cows may miss breeding, and if bred by younger bulls, poor cohorts are produced due to protracted, less synchronous calving dates. Bulls younger than five years old expend too much energy with their shallow fat reserves and are subject to higher winter mortalities.

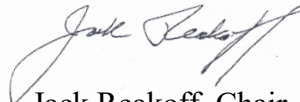
In addition to sport hunters needing more education on localized ethical hunting practices, the Councils also request that more education is needed on remote field meat care and backcountry preparedness. Proper meat care is a concern amongst the Councils; meat that is donated in the villages by sport hunters has often spoiled due to inadequate care. Wanton waste has also been observed where only the head and antlers have been salvaged leaving the meat to spoil in the field. The Councils request more enforcement presence to ensure all required salvageable meat has been transported from the field and is properly taken care of. The Councils request more education efforts for nonresident and sport hunters on environmental conditions they may encounter. Hunters need to be prepared for adverse weather conditions and have contingency plans for long weather delays while out in the field. Local search and rescue operations have experienced increased requests from unprepared hunters. This is taxing to local resources and takes away from residents in the area that might require these services for their own community emergencies.

3. The Councils are concerned over high predator populations and the impacts predators are having on herds' abilities to recover. Predator management is an important tool in providing long-term sustainability of caribou populations and ensuring subsistence needs can be met. The Councils are in support of intensive management programs that target predators that are affecting caribou herds. The Board's Predator Management Policy stipulates that if "predators have been determined to be a major contributing factor in the significant reduction of ungulate populations important for subsistence use, or in the chronic suppression of such population at low densities, the Board will endorse timely, affirmative and effective actions consistent with each respective agency's policies and management objectives, to reduce predator populations and allow affected ungulate populations to recover." The Councils request that the Board provide guidance to Federal land managers and the Councils on how the Predator Management Policy can be implemented to help caribou recover as well as any additional information on what other options may be available for the Board to pursue. The Councils additionally recommend that the Board adopt all proposals that seek to liberalize seasons and harvest limits for predators that are known to target caribou.
4. The rapidly changing climate is causing habitat change and degradation, which impacts the behaviors, health, and recoveries of caribou herds. Rapid changes to the environment are being felt throughout the state. Changing weather patterns are altering caribou migration patterns and timing. Due to warmer weather and heightened stress loads, certain caribou herds are experiencing an increase in disease and parasite loads that are impacting the overall physical condition of caribou. Extreme weather events such as rain on snow events and iced over tundra affect forage availability, and hot and dry summers create more opportunity for insect harassment as well as forest fires, which have been shown to be detrimental for caribou forage for decades. The Councils request that the Board consider more adaptive decision making when determining hunting seasons. There needs to be increased flexibility in when hunting seasons open and close to help account for the impact climate change is having on caribou movements. Additionally, the Councils request the Board direct Federal agency staff to conduct full population dynamic surveys on caribou herds across the state.
5. The Councils have concerns over communication and data sharing among Federal agencies, State agencies, and rural communities. The Councils request that Federal and State managers work collaboratively with Tribes and Alaska Native Claims Settlement Act corporations to improve data sharing and the consideration of traditional ecological knowledge in decision-making. The Councils request increased communication between the Councils and Federal agencies with the State of Alaska on decisions made on sport and commercial uses and request that subsistence harvest opportunities be prioritized over sport and guided hunts. The Councils also request that more outreach and communication is conducted with affected communities. The Council requests that Tribal consultations are required and that agencies work directly with rural users in the development of proposed regulation changes.

Thank you for your consideration of this important matter. If you have questions or would like to discuss this further, please contact Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or katerina_wessels@fws.gov.



Raymond Oney, Chair
Yukon-Kuskokwim Delta
Regional Advisory Council



Jack Reakoff, Chair
Western Interior Alaska
Regional Advisory Council



Louis Green, Chair
Seward Peninsula
Regional Advisory Council



Thomas Baker, Chair
Northwest Arctic
Regional Advisory Council



Robert Wright, Sr., Chair
Eastern Interior Alaska
Regional Advisory Council



Brower Frantz, Chair
North Slope
Regional Advisory Council

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta Regional Advisory Council
Western Interior Alaska Regional Advisory Council
Seward Peninsula Regional Advisory Council
Northwest Arctic Regional Advisory Council
Eastern Interior Alaska Regional Advisory Council
North Slope Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
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